

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, August 7, 2008

From: Leo Francendese

Subject: HoltraChem

636 John L Riegel Rd., Riegelwood, NC

POLREP No.:	9	Site #:	A47J
Reporting Period:	7/14/08 - 8/3/08	D.O. #:	
Start Date:	5/19/2008	Response Authority:	CERCLA
Mob Date:	5/19/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NCD991928631	Contract #	
RCRIS ID #:			

Site Description

The HoltraChem Site (also known as Acme Alkali) is comprised of approximately 24 acres and is located at 636 John L. Riegel Road in Riegelwood, Columbus County, North Carolina. It is surrounded on three sides by International Paper (IP), which is comprised of approximately 1,500 acres. Both HoltraChem and IP border the Cape Fear River. The surrounding area is a mixture of industrial, residential and commercial uses.

The area subject to this removal action includes neighboring IP's North Bay treatment pond, also known as Cell #2. IP formerly accepted process water generated during chlorine production from the Holtra Chem facility. HoltraChem operated as a chlor-alkali facility using the mercury cell process from 1963 to 1999, when facility operations ceased. HoltraChem was originally constructed to provide chlorine gas, caustic soda, and bleach to the IP facility. Process water from the former HoltraChem facility was reportedly discharged to the northwest corner of Cell #2 via a 16-inch diameter, corrugated galvanized steel pipe from approximately 1963 to the late 1970s or early 1980s.

A time-critical removal action was conducted at the HoltraChem Site during 2003 – 2004, during which containerized hazardous waste and the former cell building were removed. In 2004, an Engineering Evaluation / Cost Analysis (EE/CA) investigation began at the Site. During the EE/CA, the primary contaminants of concern were identified as mercury and PCB Aroclor 1268. Sampling conducted by IP identified PCB Aroclor 1268 at concentrations up to 5,100 mg/kg in Cell #2. PCB contamination extends to a depth of approximately 12 feet below the ground surface. PCB contamination has been found in the adjacent Cape Fear River sediments. IP needs to utilize Cell #2 for the expansion of their landfill sooner than the EE/CA will be completed. Therefore, a Time-Critical Removal Action is being taken to excavate the contaminated Wastewater Treatment Solids (WWTS) from Cell #2 and place the WWTS with concentrations exceeding 50 mg/kg in temporary storage on the HoltraChem Site until the final cleanup plan is selected for HoltraChem. The estimated volume of this material is 6,500 cubic yards. The cleanup goal for this removal action is 11 mg/kg based on the Human Health Risk Assessment for the Holtra Chem Site. WWTS with concentrations between 11 mg/kg and 50 mg/kg will also be excavated, but will be placed in IP's landfill Cell #1. The estimated volume WWTS with PCB concentrations between 1 mg/kg and 49 mg/kg is 93,500 cubic yards.

The Enforcement Action Memorandum for this time-critical removal action was signed on May 13, 2008. The Effective Date of the Administrative Order on Consent for this removal action was May 20, 2008.

Current Activities

RPM Samantha Urquhart-Foster and NCDENR representative David Mattison provided oversight of removal activities during this reporting period (July 14 - August 3, 2008). This POLREP covers a three week period rather than the typical one week period.

* Note: Cell #2 was divided into 100'x100' and 50'x50' grids during the investigation phase. Grids are labeled with a letter and a number. Grid locations can be found in a Figure in the Action Memo.

Activities conducted by the PRPs' contractors during this reporting period included:

Excavation Activities:

- * During July 14 - 18, 2008, approximately 2,004 cubic yards of material with PCB concentrations exceeding 50 mg/kg was excavated and transported from IP to the engineered stockpile on the HoltraChem facility. This material originated in Grids I-3, J-4, and J-5.
- * During July 21 - 23, 2008, approximately 1,068 cubic yards of material with PCB concentrations exceeding 50 mg/kg was excavated and transported from IP to the engineered stockpile on the HoltraChem facility. This material originated in Grids I-3 and J-4.
- * During July 28 - August 2, 2008, approximately 2,976 cubic yards of material with PCB concentrations exceeding 50 mg/kg was excavated and transported from IP Cell #2 to the engineered stockpile on the HoltraChem facility. This material originated in Grids I-3, I-6E, K-4, and K-5. Also, 156 cubic yards of material with PCB concentrations of approximately 5 mg/kg were transported to IP's landfill Cell #1.

Dewatering Activities:

- * Rain fell on the Site slightly more than half the days during this reporting period with measurements ranging from 0.11 to 1.88 inches per day.
- * During July 14-19, approximately 326,800 gallons of water from Cell #2 was pumped, treated, and discharged to IP.
- * During July 21-24, approximately 196,200 gallons of water from Cell #2 was pumped, treated, and discharged to IP.
- * During July 28 - August 2, approximately 287,600 gallons of water from Cell #2 was pumped, treated, and discharged to IP.
- * The total volume of water treated since treatment operations began on 6/18/08 is approximately 2,053,100 gallons.

Construction Activities:

- * The engineered stockpile #1 reached capacity on 7/18/08 with an estimated 8,052 cubic yards of PCB-contaminated soils. This estimate is based on 12 cubic yards per truck load. A better estimate will be calculated using the Trimble system in the future. The stockpile height is approximately 16 feet.
- * The second engineered stockpile (ES#2) began accepting material with concentrations greater than 50 mg/kg PCBs on 7/21/2008. As of 8/2/2008, the estimated volume of material in ES#2 is approximately 3,828 cubic yards.

Sampling Activities:

- * Water treatment system samples were collected on July 14, 17, 21, 23, 24, and 28th. All results were below the treatment goal of 3 ug/L.
- * Wipe samples were collected on an excavator on July 15th. Five samples were collected and results ranged up to 1,000 ug/wipe, which greatly exceeds the decontamination standard of 10 ug/wipe. The excavator was put back into service rather than demobilizing.
- * Waste characterization samples were collected as planned (samples are collected approximately every 1,000 cubic yards).
- * No confirmation samples were collected during this three week reporting period.

Planned Removal Actions

RPM Samantha Urquhart-Foster is providing oversight during the next reporting period, August 4-10, 2008. Activities planned for the next reporting period include:

- * Continue excavation/transport of > 50 mg/kg material to engineered stockpile #2.
- * Install top 40-mil liner on engineered stockpile #1.
- * Conduct waste characterization sampling/analysis per 1000 cubic yards placed in the engineered stockpile.
- * Conduct confirmation sampling/analysis of grids following waste removal (I-3, I-6E and possibly others).
- * Conduct material management sampling/analysis of overburden material to determine transport location.
- * Continue pumping water from Cell No. 2 to IP and continue water sampling/analysis.

Next Steps

Removal activities have been conducted according to schedule, with a few weather delays. However, the schedule has been extended once again. The schedule has been revised to change the demobilization date to September 24, 2008. The schedule extension is primarily due to:

- * construction of a second engineered stockpile to accommodate the increased volume of WWTS containing PCBs at concentrations exceeding 50 mg/kg,
- * required removal of additional material, and
- * rain delays (6 days)