

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, August 27, 2008

From: Leo Francendese

Subject: HoltraChem

636 John L Riegel Rd., Riegelwood, NC

POLREP No.:	11	Site #:	A47J
Reporting Period:	August 18-24, 2008	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 provided oversight of removal activities during this reporting period (August 18 - 24, 2008).

* 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 August 19 - 20, 2008, approximately 480 cubic yards of material with PCB concentrations exceeding 50 mg/kg was excavated and transported from IP cell #2 to the Engineered Stockpile #2 on the HoltraChem facility. This material originated in Grids G-5, I-8, and M-5. Engineered Stockpile #2 reached capacity this week with an estimated volume of 9,000 cubic yards.
- * During August 19 - 22, 2008, approximately 1,236 cubic yards of overburden and soil scraped from the bottom of grids was excavated and transported from IP cell #2 to IP's landfill. This material originated in Grids G-5, M-5, G-6E, I-8N, L-5, J-4, and K-5.

Dewatering Activities:

- * Rain fell on the Site on two days during this reporting period with measurements ranging from 0.1 to 0.26 inches per day.
- * During August 18-24, approximately 137,600 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 2,684,000 gallons.

Liner Installations:

- * The Engineered Stockpile #1 reached capacity on 7/18/08 with an approximate volume of 8,000 cubic yards of PCB-contaminated material. The liner contractor, EFI, began installing the top liner (40-mil HDPE) for stockpile #1 and seaming it to the bottom liner a few weeks ago. Due to staffing issues, the contractor did not complete the job during this reporting period as was planned. Therefore, this work will continue into the next reporting period.
- * The PRPs submitted a request to expand the Engineered Stockpile #2. EPA reviewed the request and suggested modifications. The revised request was submitted and approved. The Engineered Stockpile #2 will be expanded on all sides to make room for the remainder of the anticipated > 50 mg/kg PCB material.

Sampling Activities:

- * Water treatment system samples were collected on August 18th and 21st. All results were below the treatment goal of 3 ug/L.
- * Waste characterization samples were collected as planned (samples are collected approximately every 1,000 cubic yards).
- * A sample was collected from what appears to be a leachate collection sump that is located about 20 feet north of the current Engineered Stockpile #2 northern border. It was analyzed for mercury and pH in the on-site laboratory. The pH was 6.54 and the concentration of mercury in the water was 5.12 mg/L.

Planned Removal Actions

RPM Samantha Urquhart-Foster will provide oversight during the next reporting period, August 25-31, 2008. Activities planned for the next reporting period include:

- * Continue excavation of < 50 mg/kg PCB material and transport it to IP's landfill.
- * Continue installation of top 40-mil liner on Engineered Stockpile #1 and perform QA/QC testing.
- * Anchor Engineered Stockpile #1 bottom liner to the cell pit.
- * Construct additional storage area for Engineered Stockpile #2.
- * Continue excavation of > 50 mg/kg PCB material and transport it to the expanded Engineered Stockpile #2.
- * Utility locator will be on-site to locate the effluent return line and attempt to locate the former discharge pipe.
- * Begin excavation of discharge pipe under IP access road for removal.
- * Conduct waste characterization sampling/analysis per 1000 cubic yards placed in the engineered stockpile.
- * Conduct confirmation sampling/analysis of grids following waste removal.
- * 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 are still scheduled to be completed by September 24, 2008.

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