

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, September 18, 2008

From: James Webster

Subject: Final Pollution Report
Circle Environmental #2
2222 Albany Hwy, Dawson, GA
Latitude: 31.7611000
Longitude: -84.4361000

POLREP No.:	4	Site #:	A4FRD
Reporting Period:	12/18/2007	D.O. #:	
Start Date:	9/10/2007	Response Authority:	CERCLA
Mob Date:	9/10/2007	Response Type:	Emergency
Demob Date:	12/18/2007	NPL Status:	Non NPL
Completion Date:	12/18/2007	Incident Category:	Removal Action
CERCLIS ID #:	GAN000410082	Contract #	
RCRIS ID #:			

Site Description

The Circle Environmental #2 Site is located at 2222 Albany Highway in unincorporated Terrell County, Georgia, approximately 3 miles south of the Circle Environmental #1 Site. The Site occupies an undeveloped portion of a diesel engine repair and wrecker service.

USEPA received a request from the Georgia Environmental Protection Division to take action at the Site, on September 10, 2007. Reports from the State indicated that the Site is associated with an inactive waste management facility known as Circle Environmental located at 170 5th Street in Dawson, Georgia. Circle Environmental is reported to have been an operation that cleaned oil and solvent tainted wipe rags. Circle Environmental #2 was reported to contain in excess of 100 drums and a number of roll-off boxes partially filled with oil and solvent contaminated rags, believed to have come from the Circle Environmental facility in Dawson, Georgia. The FOSC responded to the facility on September 10, 2007, met with local officials at the Circle Environmental #1 Site and proceeded to the Circle Environmental #2 Site where he met with and received written access authorization from the property owner and performed a visual inspection of the Site. The following observations were made:

- Approximately 200+ drums, many of which appeared to be empty, but were suspected to have contained oil and solvent contaminated wipe rags that had been dumped into roll-off boxes at the Site. An unknown number of the drums appeared to be full of waste material. A large number of the open drums contained accumulated rainwater..
- Many of the drums carried labels indicating that they had contained flammable materials.
- Three roll-off containers were staged at the Site. Two of these containers were partially filled with suspected oil/solvent contaminated wipe rags.
- Additional wipe rags were littered across the Site.
- A noticeable solvent odor was present in the vicinity of several of the drums.
- The drums and roll-offs were located within 100 feet of Albany Highway.
- The Site was totally unsecured to prevent unauthorized access.

The primary chemicals of concern, based upon container labels and from information gained from local and state officials and the former operator, of the Site are believed to be waste oil, and organic solvents including flammable materials. All these materials were located within an unsecured area. The roll-offs contained contaminated wipe rags were not covered and not sealed to contain accumulated rainwater. Consequently, rainwater falling within the containers might come in contact with the waste material, pickup hazardous substances, and leak them to the environment.

Based upon his observations and findings, the OSC determined that conditions at the Site met NCP Part 300.415(b)(2) criteria for initiating a removal action. The action was initiated as a CERCLA fund-lead event.

Current Activities

Between September 11 and 12, 2007 ERRS personnel staged all drums at the Site on plastic sheeting while START inventoried and photographed each drum to document its condition, markings, and contents. From September 13 through 15, 2007 all empty drums were crushed and placed in roll-off containers. The two roll-off containers containing solvent soaked rags were covered with plastic sheeting pending disposal profiling and disposal. A total of 19 drums containing contaminated rags, water, and paint waste and sludge were secured at the Circle Environmental #1 Site pending disposal.

On October 15, 2007 the roll-offs of crushed drums were transported off-site for disposal. These were followed on November 13, 2007 by two roll-offs of contaminated rags. On September 27, 2007 START collected confirmation soil samples from the areas where drums had been discarded. Analytical results obtained from the samples indicated no residual contamination of concern. On December 18, 2007 all remaining transportation and disposal activities were completed at the Circle Environmental #1 Site including 19 drums that had originated at CE#2. Two 8-hour air samples were collected from the interior of the warehouse and one 8-hour air sample was collected from outside the warehouse. Following collection of the samples, all EPA resources were demobilized from the Site.

On June 19, 2008 Technical Services Section completed review of the air sampling data. The review concluded that all reported concentrations were below or within EPA risk targets. Thus from a risk assessment perspective, no further remediation was required and no landuse or other restrictions were necessary.

The following is a summary of waste disposition from CE#2:

Contaminated rags: 13 drums
Contaminated rags: 2 roll-off boxes
Paint waste: 1 drum
Aerosol cans: 1 drum
Contaminated water: 3 drums
Trash and floor sweepings: 1 drum
Empty drums and debris: 3 roll-off boxes

Planned Removal Actions

No further removal activities are planned for this Site.

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