

**United States Environmental Protection Agency**  
**Region IV**  
**POLLUTION REPORT**

**Date:** Thursday, September 18, 2008

**From:** Leo Francendese

**Subject:** HoltraChem

636 John L Riegel Rd., Riegelwood, NC

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

#### **Site Description**

(This photograph was taken on 9/10/2008 and shows the contractors rolling out additional 40-mil HDPE liner for the expansion of Engineered Stockpile #2.)

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 was 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 was 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 (September 8 - 14, 2008). EPA BRIDGE Intern Tara Houda accompanied the RPM to the Site this week. Dave Mattison, NCDENR, visited the Site on Monday, 9/8, to assess storm damage. Prashant

Gupta, Honeywell Project Manager, visited the Site on 9/10 to observe the project status as well as to meet with the RPM and contractors.

\* 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 focused on recovering from tropical storm Hanna. The storm deposited 2.7 inches of rain the prior weekend and caused minor tears in the overflap of the liner on Engineered Stockpile #1 (ES#1). Activities conducted this week included:

\* Repaired damage from Tropical Storm Hanna.

\* Began liner installation for Engineered Stockpile #2 (ES#2).

\* Change in fly ash delivery method: High dust release during fly ash delivery required the implementation of a "roll off" plan. This plan required the pumping of fly ash into an overturned roll off container to limit dust release.

#### Excavation Activities:

\* Because of rain and liner expansion occurring on ES#2, excavation was limited this week. On September 9 and 10, 2008, approximately 372 cubic yards of soil was transported from IP Cell #2 to IP's landfill. This material originated from the pipe trench excavation in the road and Grids I-12 and Q-8. On September 12th, 660 cubic yards of material was excavated from Grid O-6W and was staged in a temporary stockpile.

[Note: Both ES #1 and ES #2 are currently at capacity. No additional material can be moved from IP to HoltraChem until the expansion of ES#2 is complete. ES #1 is estimated to contain 8,000 cubic yards and ES #2 is estimated to contain 9,000 cubic yards. It is currently estimated that an additional 6,000 cubic yards remains to be excavated and placed in ES #2.]

#### Dewatering Activities:

\* Rain fell on the Site on two days during this reporting period with measurements ranging from 0.33 to 2.47 inches per day. The heaviest rain day was Wednesday, September 10, 2008.

\* During September 8-14, approximately 401,600 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 3,445,400 gallons.

#### Sampling Activities:

\* Water treatment system samples were collected on September 8th and 11th. All results were below the treatment goal of 3 ug/L.

\* No "material management", confirmation, nor waste characterization samples were collected this week.

#### Planned Removal Actions

RPM Samantha Urquhart-Foster will provide oversight from the office during the next reporting period, September 15-21, 2008. Activities planned for the next reporting period include:

\* Continue water treatment system operations.

\* Collect water treatment system samples.

\* Continue and complete construction of additional storage area for ES#2 and submit QA/QC test results to project team.

\* Upon approval of liner installation QA/QC results, begin hauling >50 mg/kg material to ES#2

\* Continue mixing/hauling <50 mg/kg material from the southeast corner of Cell #2

\* Continue excavation activities pending analytical results

\* Collect material management samples from excavated areas in Cell #2

#### Next Steps

The schedule for the completion of the removal activities was extended two more days because of days lost due to rain during this reporting period. The revised schedule indicates the demobilization date shifted from October 1st to October 3, 2008. The schedule may be extended further if there are numerous rain delays or more contaminated material is discovered than is currently anticipated.