

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

**Date:** Wednesday, October 8, 2008

**From:** Leo Francendese

**Subject:** HoltraChem

636 John L Riegel Rd., Riegelwood, NC

<b>POLREP No.:</b>	17	<b>Site #:</b>	A47J
<b>Reporting Period:</b>	9/25 - 10/5/2008	<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**

(The photo associated with this POLREP is of a load of PCB-contaminated material being dumped into Engineered Stockpile #2. The excavator assists in emptying the dump truck and moving the material into a pile that is accessible to a dozer.)

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 29 - October 5, 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:

\* Continued excavation/transportation of material with PCB Aroclor 1268 concentrations greater than 50 mg/kg. During September 29 through October 3, 2008, approximately 2,832 cubic yards of soil was transported from IP Cell #2 to Engineered Stockpile (ES) #2. This material originated from Grids G-6, G-8 and I-8.

\* Continued excavation/transportation of material with PCB Aroclor 1268 concentrations less than 50 mg/kg. During September 29 through October 3, 2008, approximately 1,836 cubic yards of soil was transported from IP Cell #2 to IP's landfill. This material originated from Grids K-8, M-10, M-14, O-6, O-8, and O-14.

[Note: ES #1 is at capacity with approximately 8,000 cubic yards of material. The top and bottom liners have been seamed together. As of the end of this reporting period, ES #2 is estimated to contain 11,200 cubic yards.]

#### Dewatering Activities:

\* No rain fell on the Site during this reporting period.

\* During September 28 - October 3, 2008 approximately 277,900 gallons of water from Cell #2 was pumped, treated, and discharged to IP.

\* The total volume of water treated since treatment operations began on June 18, 2008 is approximately 3,960,600 gallons.

#### Sampling Activities:

\* Collected confirmation, water treatment, and waste characterization samples.

#### Analytical Data received during the reporting period:

\* Water treatment data from samples collected on 9/29 were undetected for Aroclor 1268 with a maximum detection limit of 0.63 ug/L. (The treatment goal is <3 ug/L.)

#### Planned Removal Actions

David Mattison of NCDENR will provide oversight during the next reporting period, October 6-12, 2008. Activities planned for the next reporting period include:

\* Continue water treatment system operations.

\* Collect water treatment system samples.

\* Continue excavation/transportation of <50 mg/kg material to IP's landfill.

\* Continue excavation/transportation of >50 mg/kg material to ES#2.

\* Collect confirmation samples from base and sidewalls of excavated grids.

\* Collect material management samples from excavated material in ES#2.

\* Scrape additional material from the base/sidewalls of grids pending analytical results.

\* Begin installation of the top liner on ES#2.

#### Next Steps

The schedule for the completion of the removal activities remains the same as it was last week. The demobilization date is still scheduled for October 23, 2008. The schedule may be extended further if there are numerous rain delays or more contaminated material is discovered than is currently anticipated.

[response.epa.gov/holtrachemWWTS](http://response.epa.gov/holtrachemWWTS)