

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, October 23, 2008

From: Leo Francendese

Subject: HoltraChem
636 John L Riegel Rd., Riegelwood, NC

POLREP No.:	19	Site #:	A47J
Reporting Period:		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 photo associated with this POLREP is of Engineered Stockpile #2. The top 40-mil liner was installed on the right half during this reporting period.)

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 HoltraChem 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

David Mattison, NCDENR, provided oversight of removal activities during this reporting period (October 13 - 19, 2008), with RPM Samantha Urquhart-Foster coordinating from the office.

* 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. On October 17, 2008, approximately 84 cubic yards of soil was transported from IP Cell #2 to Engineered Stockpile (ES) #2. This material originated from Grid H-5.

- * Continued excavation/transportation of material with PCB Aroclor 1268 concentrations less than 50 mg/kg. During October 13-17, 2008, approximately 2,856 cubic yards of soil was transported from IP Cell #2 to IP's landfill. This material originated from Grids G-6SE, G-8SW, I-3, I-8NE, I-8NW, I-8SW, O-14 and Q-14.

- * Resumed over-excavation of the former pipe trench and collected confirmation samples for lab analysis. Material removed from the trench was stockpiled for sampling to determine destination.

- * Stockpiled remaining overburden material in the overburden stockpile area for sampling and subsequent teardown of this stockpile area.

[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 11,412 cubic yards.]

Liner Installation Activities:

- * EFI (liner subcontractor) was onsite to finish Stockpile #1 (vents, bags) and covering of ½ of Stockpile #2.

Dewatering Activities:

- * Rain fell on the Site on three days during this reporting period, with amounts ranging from 0.01 to 0.26 inches per day.

- * During October 12-18, 2008 approximately 138,500 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 4,225,500 gallons.

Sampling Activities:

- * Collected confirmation and water treatment samples.

Analytical Data received during the reporting period:

- * Confirmation sample data from grids numerous grids were received during this reporting period. Results ranged from undetected to 530 mg/kg. The following grids had confirmation results that exceed the cleanup goal of 11 mg/kg for Aroclor 1268 and will require additional excavation: the base of Grid I-6 NW quadrant (26 mg/kg), the base of H-4 (13 mg/kg), the base of H-5 (39 mg/kg), the sidewall of G-5 south (530 mg/kg), the wall of G-5 west (110 mg/kg), the wall of G-8 SWS (47 mg/kg), and the wall of the pipe trench associated with sample 2SW (140 mg/kg). The PRPs are attempting to achieve remediation levels of less than 1 mg/kg. The bases and sidewall of several of the grids had concentrations between 1.5 and 8.1 mg/kg.

- * Water treatment data from samples collected on 10/7 and 10/9 indicate that the treatment system is still operating effectively, with effluent results of undetected for Aroclor 1268 with a maximum detection limit of 0.64 ug/L. (The treatment goal is <3 ug/L.)

Planned Removal Actions

Samantha Urquhart-Foster will provide oversight during the next reporting period, October 20-26, 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.

- * Begin cell-wide confirmation sampling at grid nodes with off-site lab analysis.

- * Scrape additional material from the base/sidewalls of grids where analytical results indicated exceedance of cleanup goals.

Next Steps

The schedule for the completion of the removal activities indicates demobilization on November 6, 2008. However, the demobilization date is highly dependent upon sample results from bottom scrapes as well as efforts required for decontaminating equipment.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/holtrachemWWTS

POLREP #19 Last Updated 10/28/2008