United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, December 3, 2008
From: Leo Francendese

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

POLREP No.:	24	**Site #:**	A47J
Reporting Period:	November 17-23, 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 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
Activities conducted by the PRPs' contractors during this reporting period, November 17-23, 2008, included:

* Transported 4 truck loads (approximately 48 cubic yards) of material from the Decon Pad to Engineered Stockpile #2.
* Began and completed backfill of former pipe trench with approved material from Navassa pit, including

all required testing.
* Continued decontamination of site equipment. Wipe sample results from the decontaminated Hitachi 330 Excavator indicated the cleanup goal had been achieved. All results were less than 1 ug/wipe (cleanup goal is 10 ug/wipe or less).
* Began additional excavation of unsuitable material from the southeast corner of Cell No. 2 per IP's request. Transported approximately 600 cubic yards to IP's landfill from grids U-10, U-12, and U-14.
* Continued pumping water from Cell No. 2 to IP and continued water sampling/analysis. Approximately 338,500 gallons was treated during this reporting period, bringing the total volume treated during the project to 4,946,900 gallons. On 11/17 and 11/20, samples were collected for analysis. Effluent results were below the treatment goal of 3 ug/L; influent results were 3.3 ug/L; and carbon filter results were 1.7 mg/kg.
* Began completing the Pre-Final Inspection findings.

Planned Removal Actions

Activities planned for the next reporting period include:
* Continue completing the Pre-Final Inspection findings.
* Continue pumping water from Cell No. 2 to IP and continue water sampling/analysis.
* Continue excavation of unsuitable material from the southeast corner of Cell No. 2 and staging wet material within Cell No. 2 for subsequent IP handling.
* THANKSGIVING HOLIDAY BREAK

Next Steps

The revised schedule for the completion of the removal activities indicates demobilization on December 17, 2008. The shift is due to weather delays and to include 10 days of water treatment prior to demobilization (previous schedules indicated demobilization, then extended water treatment). Additional water treatment is still on the schedule, but may not be required.

response.epa.gov/holtrachemWWTS