

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

**Date:** Wednesday, December 10, 2008

**From:** Jennifer Wendel

**To:** Christopher Masterson, EPA

**Subject:** On-going Removal Action Update for 12/1 to 12/6/08  
Ecusta Mill  
1 Ecusta Road, Pisgah Forest, NC  
Latitude: 35.2711000  
Longitude: -82.7050000

<b>POLREP No.:</b>	3	<b>Site #:</b>	A4AK
<b>Reporting Period:</b>	12/1-12/6/08	<b>D.O. #:</b>	
<b>Start Date:</b>	9/22/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/22/2008	<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>	NCD003166675	<b>Contract #</b>	EP-W-05-053
<b>RCRIS ID #:</b>			

**Site Description**

The Ecusta Mill is a former flax pulping and paper manufacturing facility that was built in 1939 and was operational until 2002. Cellophane production also occurred at the facility for approximately 30 years. In addition, the following activities have occurred at the Site: chlorine production operations using Sorenson mercury cells (electro-chemical building); caustic storage; water and wastewater treatment; and printing. EPA's Removal Program and the North Carolina Department of Environment and Natural Resources (NC DENR) first responded when the plant was closed down in 2002. Of primary concern were potential releases from an interruption of power to the basement sumps under the production buildings. The EPA Environmental Response Team conducted sampling of the concrete floor, the sub-floor, and soils under the electro-chemical building and sediments in on-site ditches. This sampling confirmed the presence of mercury in the sub-floor structures to 16 feet below ground surface (580 mg/kg) and the floor drains (260 mg/kg) of the electro-chemical building, in the indoor air and in the overland drainage ditches which had received historic discharge from the building.

An Expanded Site Inspection (ESI) was conducted by EPA Region 4, Science and Ecosystem Support Division and the State in March, 2004. The ESI focused on two main areas of concern, the electro-chemical building and the Aeration and Sedimentation Basin (ASB) area. Mercury was detected in soils adjacent to the electro-chemical building, in sediments in the on-site drainage ditches and in sediments of the Davison River immediately adjacent to the manufacturing area. The ESI also confirmed soils and sediments in other areas of the site are contaminated with mercury and dioxin. Groundwater sampling has confirmed low-levels of mercury in groundwater near the electro-chemical building, low levels of carbon disulfide and 1,1-Dichloroethane near the cellophane plant, and a high pH reading (pH 12.17) in the area of a previous caustic spill.

The total Site is approximately 527 acres in a mixed-use residential/industrial area. The manufacturing facility is approximately 213 acres. The ASB has a surface area of approximately 75 acres and was used for wastewater treatment. The ASB also receives storm water from approximately one-third of the site, including those areas historically most actively involved in paper production. The following industrial solid waste landfills are located at the Site: the Island landfill, the new ash landfill; the old ash and sludge landfills which are unlined industrial landfills which do not have permit numbers issued. The previous site owner is in the process of closing all landfills in compliance with State permit requirements.

A small arms firing range has been historically operated on the Site south of the main manufacturing operations on a largely undeveloped parcel of land near the confluence of the Davidson and French Broad Rivers. Lead impacted soil has been document from the historic firing range.

Renova Partners, a Brownfields redevelopment company purchased the property in January 2008. Renova formed a subsidiary company Davidson River Village, LLC (DRV) who is conducting

complete demolition of all on-site structures prior to site redevelopment. D.H. Griffin was retained by DRV to conduct the demolition.

DRV is conducting the Removal Activities at the site under an AOC with EPA. They have hired Shaw Environmental as the lead environmental contractor. Removal Activities include a Time Critical Removal Action and 2 Non-Time Critical Removal Actions.

**Current Activities**

DARI ACM abatement crews working in building 43,62.

DH Griffin demolition activities continuing in buildings cleared in phase I, the cellophane area buildings and continuing removal of debris from building 70.

DH Griffin recycling contractors continuing removing recyclable supplies and equipment.

DH Griffin/ Shaw continuing with slab removal and investigation in the cellophane area.

DH Griffin completing installation of retention basins and the berm on the south end beginning installation in pit near bldg 62.

DH Griffin and Mountain Environmental completing removal of OHM materials and caustic tanks in building 70 and have initiated activities in bldg 73.

DH Griffin performing perimeter dust monitoring.

Shaw collecting QC samples for lead paint and perimeter dust.

Shaw collecting QC samples for Mercury and lead testing in slab debris at south end of property.

Shaw, DH Griffin and Mountain Environmental continuing the pre-demolition clearance process in phase I buildings.

Shaw continuing the slab investigation process in the cellophane area.

**Planned Removal Actions**

On-going activities in all area simultaneous as described above.

**Next Steps**

Upcoming Work Anticipated: Week beginning December 8, 2008

DARI ACM abatement crews will continue working in building 43,62.

DH Griffin demolition activities will continue in buildings cleared in phase I and III.

DH Griffin recycling contractors will continue removing recyclable supplies and equipment.

DH Griffin/ Shaw will continue slab removal and investigation in the cellophane area.

DH Griffin will continue installation of retention basins and the berm on the south end of the site.

DH Griffin and Mountain Environmental will continue to remove OHM materials.

DH Griffin will perform perimeter dust monitoring.

Shaw will collect QC samples for lead paint and dust.

Shaw, DH Griffin and Mountain Environmental will continue the pre-demolition clearance process.

Shaw will continue the slab investigation process in the cellophane area including crushed debris sampling.

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
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<b>Extramural Costs</b>				
RST/START	\$83,740.00	\$61,507.83	\$22,232.17	26.55%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$83,740.00	\$61,507.83	\$22,232.17	26.55%

\* 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.

**Disposition of Wastes**

DH Griffin (DARI) shipped three truckloads of asbestos to Charlotte Motor Speedway Landfill totaling 35 tons.

DH Griffin shipped seven loads of scrap metal weighing 107 tons to DH Griffins Greensboro office for recycling.

DH Griffin shipped 22 loads of construction debris weighing 410 tons to WCA Landfill for disposal.

DH Griffin shipped two loads of non-hazardous material debris weighing 17.7 tons to WCA Landfill for disposal.

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

POLREP #3 Last Updated 1/26/2009