

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, December 15, 2008

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Subject: Initial POLREP (PRP Removal Action)

Seven Out
901 Francis Street, Waycross, GA
Latitude: 31.2079196
Longitude: -82.3642648

POLREP No.:	5	Site #:	A4FY
Reporting Period:	11/10/2008-11/18/2008	D.O. #:	
Start Date:	1/27/2005	Response Authority:	CERCLA
Mob Date:	1/27/2005	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	GAN000407811	Contract #	
RCRIS ID #:			

Site Description

The Seven Out facility is an industrial wastewater treatment plant in Waycross, Ware County, Georgia, that operated from 2002 to 2004. The Site consists of a tank farm, an abandoned office building, and a small warehouse. The tank farm has 37 tanks ranging in volume of 8,000 gallons to 44,000 gallons, and a combined capacity of approximately 400,000 gallons. It is approximately one-half acre and is made of a concrete floor with a short concrete containment berm. South of the containment area is an office building of about 3,000 square feet. Around the south and east sides of the office building is a fenced lot that contains the warehouse of about 4,500 square feet. The warehouse contains several drums, totes, and dry bags of material.

When the facility operated, treated wastewater was discharged to the City of Waycross publicly owned treatment works (POTW) using the City's collection system. Precipitated solids were treated in a filter press, and then transported off-Site for disposal at a landfill. The treatment process was generally unsuccessful and effluents regularly exceeded requirements of the company's pre-treatment discharge permit. The Seven Out facility received several Notices of Violation and an Administrative Order from the City of Waycross. On March 1, 2004, the City of Waycross disconnected the facility's connection to the POTW. The facility discontinued processing wastewaters, although it still received shipments. Incoming wastewaters were stored in tanks on-Site as well as four rented portable tanks that were placed on an adjoining property. Shortly thereafter and since that time, the facility ceased all operations without discharging the remaining waste in storage. Georgia EPD determined the facility to be incorrectly storing hazardous wastes and out of compliance with State of Georgia regulations.

An emergency action was initiated by EPA on January 27, 2005 while inspecting the Site during a Removal Site Evaluation. Under the emergency response action, pumpable liquids in the tanks and standing water in the secondary containment area were removed to mitigate the threat of release.

Following the 2005 emergency action, several tanks still contained a significant volume of unpumpable sludges; also, rainwater began collecting again in the secondary containment area, causing deterioration of the tanks still holding material. An administrative order was signed on July 30, 2008, between EPA and Respondents, consisting of several generators that sent waste to the facility, to conduct a time-critical removal action to remove all remaining waste materials from the Site.

Current Activities

Respondents under the administrative order hired Winter Environmental (Winter) to conduct the removal action. Winter submitted a Removal Action Work Plan (RAWP), Quality Assurance Project Plan (QAPP), and site-specific Health And Safety Plan (HASP) on September 12, 2008. The documents were reviewed and returned for corrections on September 19 with a list of requested revisions documented in a letter. Revised versions of the three plans were submitted by Winter on October 9, and

an additional revised version to the QAPP was submitted on October 22; all three plans were approved on October 23.

START contractor Tetra Tech was tasked with providing oversight support for the PRP-lead removal action. START submitted a final Work Plan on November 5, 2008, which included a Site-Specific Sampling Plan and Quality Assurance Project Plan. Samples collected by START over the course of the Site will be splits of samples collected by Winter and analyzed by separate laboratories using the same methods. For waste sample collection, START was asked to be prepared to collect 15 split samples from the 57 waste samples anticipated by Winter. The comparable analysis data, as well as observations documented during the sample collection process, will be used to establish a level of reliability in Winter's methods.

On November 10, 2008, Winter, START and EPA arrived on-site to begin waste sampling. Split sampling procedures were established during the morning safety briefing. Winter used a man-lift to assess man-ways or other access points on all the tanks and determine which tools would be needed to open them. It was observed that proper air monitoring methods were being used when approaching and attempting to open a tank, as had been documented in the RAWP. Several tanks could not be opened with the equipment available, so more powerful equipment was ordered.

On November 11, Winter entered the garage/storage area at the southeast corner of the property wearing Level C PPE to sample drums and totes. One drum yielded elevated CO readings at the breathing zone when opened, so the crew properly vacated the building. Winter's PM determined that work could not safely continue in Level C PPE, and decided that Level B would be necessary. However, Winter did not have the necessary equipment for an SAR or SCBA entry and would require 48-72 hours to acquire it. EPA and START determined that it would be practical and cost effective to have SCBA's shipped empty from START's office in Atlanta (which could be done in less than 24 hours), fill the tanks at a local fire station, and allow START to conduct the Level B entry to collect the necessary samples. During the remaining day, Winter worked to access containers that could be opened using available equipment and began collecting samples from open-top containers.

On November 12, START received and filled the SCBA units, then entered the garage/storage area wearing Level B PPE to collect samples from drums and totes using Winter's collection jars. START also collected a split sample from one of the drums. Winter received the heavy duty equipment needed to begin hammering off rivets from man-ways on three tanks (SH2, SH3, and SH4) that could not be safely opened by any other means. When all the tanks were opened, sampling activities began from the man-lift. Prior to sampling, air monitoring measurements were taken and recorded. None of the tanks presented an hazardous atmosphere that would require Level B protection, though some tanks yielded low LEL readings that will prevent them from being torched or cut by any method that could produce a spark or flame. Strong odors of decomposing material were observed from several tanks; a faint odor of mercaptan was observed in the staging area while nearby tanks were open, but the odor was neither strong nor prolonged. Material levels in several tanks was significantly higher or lower than originally indicated by the "current levels" chart created after the 2004 EPA Emergency Response Action by Tetra Tech. The discrepancies may have been due to inadequate measuring methods, miscommunication between documentation and removal activities, evaporation, leaking, or settling.

On November 13-14, sampling continued but was threatened by nearby rain showers and a possibility of lightning. The observable area and electronic weather reports were monitored by all personnel throughout the day. START collected approximately 8 split samples from the tanks before operations were forced to cease on November 14 by Winter. EPA demobilized from the Site on November 14 and START demobilized on November 15.

Winter returned to the Site on November 17 and completed sampling all of the tanks on November 18. The open tops were covered with wood to prevent infiltration of rainwater and sealed with caulk to prevent odorous gases from escaping.

Planned Removal Actions

- Implementation of the OSC-approved removal action in accordance with the schedule and requirements of a Removal Action Work Plan (ONGOING);
- Removal of waste material from all tanks, drums, and other containers on the Site, as well as from the secondary containment area;
- Decontamination and/or disposal of all tanks, drums, and other containers on the Site, as well as decontamination of the secondary containment area; and
- Disposal of the waste material removed from the Site, including any sampling and analysis necessary to determine proper treatment and disposal methods.

Next Steps

Winter and START expect to have analysis data returned from the laboratories by mid-December. The data that was collected will be shared and compared for consistency. Inconsistent data may require Winter to resample one or several tanks based on the severity of any discrepancy and the likelihood of a laboratory error.

Winter will review the data to determine which waste streams will be needed, and will identify a treatment and/or disposal facility for the waste. Information on the selected treatment and/or disposal facility must be submitted to EPA 14-days in advance of the first load being shipped off-site.

Key Issues

On November 14, a flow of liquid was observed emitting from tanks SH2, SH3 and SH4. It was determined that the moisture was coming from seeps on the sides or bottoms of these tanks that had been jarred by the pneumatic hammer used to remove the man way rivets at the top. It was unlikely that the moisture could be rainwater or condensation from the tanks' sides since it was only produced from the three tanks and no others. An organic sheen was observed in the puddle, and the observable volume was produced at an estimated rate of 2-5 gallons per day. Winter surrounded the tanks with sorbent socks and wrapped the area with caution tape. Moisture from the seep was not observed by Winter on November 17 and 18 prior to demobilization. The rate of seepage and observable tank condition allowed Winter to conclude that the Site condition was stable until crews return for waste removal in January. EPA requested that the Site be observed on at least one or two occasions during the temporary demobilization period to ensure that the seep had not returned.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$48,000.00	\$13,942.56	\$34,057.44	70.95%
Intramural Costs				
Total Site Costs	\$48,000.00	\$13,942.56	\$34,057.44	70.95%

* 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/sevenout

POLREP #5 Last Updated 6/12/2009