United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Wednesday, December 17, 2008

From: Leo Francendese

Subject: HoltraChem

636 John L Riegel Rd., Riegelwood, NC

POLREP No.: 27 **Site #:** A47J

Reporting Period: D.O. #:

Start Date:5/19/2008Response Authority:CERCLAMob Date:5/19/2008Response Type:Time-CriticalDemob Date:NPL Status:Non NPLCompletion 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, December 8-14, 2008, included:

- * Rainfall impacted site activities this week.
- * Excavation of unsuitable material from the southeast corner continued per IP's request. IP will be requested to visit the site on 12/15 to determine the extent of remaining material (if any).
- * Completed transporting approximately 170 cubic yards of fly ash-mixed Settling Pond #1 (SP-1)

material to engineered stockpile #2. SP-1 needed to be cleaned out to allow adequate retention time to floc solids.

- * Water treatment occurred on four days during this reporting period, with a total volume treated this week of 332,900 gallons. This brings the total amount treated since June to 5,588,700 gallons.
- * Analytical results for the water samples collected on 12/01, 12/04, 12/06, and 12/08 were reported to the Team during the week. All results were below the goal of 3 ug/L. Results are pending for samples collected on 12/10 and 12/12.
- * Continued completing the Pre-Final Inspection findings.

Planned Removal Actions

Activities planned for the next reporting period include:

- * Complete removal of unsuitable material.
- * Complete pumping water from Cell No. 2 to IP and complete water sampling/analysis. Completion of this water treatment is dependent on IP acceptance of the influent analytical results. Subsequently, the contractor will dismantle the water treatment system.
- * Complete rough grading of Cell No. 2, including backfill/compaction in the northwest corner of the Cell to promote drainage to the southeast.
- * Continue completing the Pre-Final Inspection findings.
- * Preparation of the final report is ongoing.
- * Preparation for final site demobilization.

Next Steps

The schedule for the completion of the removal activities indicates demobilization has been shifted to December 24, 2008, due to rain delays. This date is dependent on influent water sample results of Aroclor 1268 remaining below 3 ppb for five consecutive sampling events. The final walk-through is tentatively scheduled for January 8, 2009.

response.epa.gov/holtrachemWWTS