

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, January 26, 2009

From: Jennifer Wendel

To: Christopher Masterson, EPA

Subject: On going Removal Activities for 1/12 to 1/17/09

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	6	Site #:	A4AK
Reporting Period:	1/12/ to 1/17/09	D.O. #:	
Start Date:	9/22/2008	Response Authority:	CERCLA
Mob Date:	9/22/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NCD003166675	Contract #	EP-W-05-053
RCRIS ID #:			

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

- Shaw continued sampling crushed concrete/brick debris and collected and analyzed (metals) vault liquids near buildings 53/59.
- Shaw continued the building clearance process; buildings 41, 75 and 90 were cleared for demolition.
- Shaw continued the building clearance process of building on the east side of the site.
- DH Griffin (DARI) shipped 6 truckloads of asbestos to Charlotte Motor Speedway Landfill totaling 45.9 tons.
- DH Griffin shipped 13 loads of scrap metal weighing 206 tons to DH Griffins Greensboro office for recycling.
- DH Griffin shipped 28 loads of construction debris weighing 444 tons to WCA Landfill for disposal.
- DARI continued asbestos abatement in pipelines on the east side of the site.
- DH Griffin continued demolition of buildings 15,21,27,28,29,41,55,73.
- DH Griffin continued crushing operations in the north end of the site.
- DH Griffin continued slab removal operations on the east side of the site.
- DH Griffin continued perimeter dust monitoring.
- Mountain Environmental continued to remediate OHM.
- DRV continued discharging from the north clarifier into the ASB.
- Shaw continued slab assessment activities in building slabs 14,21,38,40 and 47. The building 14 composite indicated elevated arsenic levels and requires additional analytical.
- Based on regulator review, Shaw finalized the Tech Memo discussing elevated arsenic background levels used as fill material in the cellophane area.
- Shaw completed the remaining (PAH) hot spot excavation at SB-04. Four sidewalls and one floor sample were sent for lab analysis. Approximately 16 cubic yards were excavated and placed in Building 89 with the remaining Olin area soils.
- Shaw completed hotspot removals at four cellophane areas: B101, B106, B94, B95, and B82. Approximately 200 cubic yards, mostly for B-82, of soil were generated from the removals and all soil was transported and staged in secure Building 89.
- Shaw received final acceptance of the TCRA Work plan from EPA with the finalization of the Ditches investigation strategy (attached).

Planned Removal Actions

- DH Griffin ACM abatement crews will continue working on east end piping.
- DH Griffin demolition activities will continue in buildings cleared in phase I, III and V.
- DH Griffin recycling contractors will continue removing recyclable supplies and equipment.
- DH Griffin/ Shaw will continue slab removal and investigation process.
- DH Griffin and Mountain Environmental will continue to remove OHM materials.
- Shaw will collect samples for dust and crushed debris. PCB analysis has now been added to the program in addition to the ongoing lead analyses.
- Shaw and the subcontract driller will mobilize and complete investigations in the caustic area including borings under the former black liquor tanks that were not previously accessible until demolition occurred. Two nested well sets are also planned to determine vertical groundwater gradients.
- Shaw will mobilize personnel and equipment to begin the Ditches sampling program. Some clearing/grubbing and lay-out of the sampling transect locations will occur first, followed by hand auger sampling of the ditch sidewalls. The driller will be used to sample the deep sediment sampling locations at the ditch headwalls. Ditch investigations are anticipated to take three weeks.
- Shaw will initiate a new slab investigation documentation procedure based on regulator input utilizing a form for each slab area investigated. Additionally Shaw will produce a Request for Concurrence form for regulator approval prior to initiating any hotspot soil removals from slab areas.
- and state/federal regulators will continue to investigate arsenic soil background levels.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$123,740.00	\$106,417.74	\$17,322.26	14.00%
Intramural Costs				
Total Site Costs	\$123,740.00	\$106,417.74	\$17,322.26	14.00%

* 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.

Disposition of Wastes

Shaw completed load-out of the stabilized lead containing soils from the Rifle Range to the Republic Services landfill in Enoree, SC. A total of 57 loads weighing 1175 tons have been shipped to the facility.

DH Griffin (DARI) shipped 6 truckloads of asbestos to Charlotte Motor Speedway Landfill totaling 45.9 tons.

DH Griffin shipped 13 loads of scrap metal weighing 206 tons to DH Griffins Greensboro office for recycling.

DH Griffin shipped 28 loads of construction debris weighing 444 tons to WCA Landfill for disposal.

response.epa.gov/EcustaMillSite

POLREP #6 Last Updated 1/26/2009