United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Friday, January 30, 2009 **From:** Leo Francendese

Subject: HoltraChem

636 John L Riegel Rd., Riegelwood, NC

POLREP No.: 33 **Site #:** A47J

Reporting Period: January 18-24, 2009 **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 photograph associated with this POLREP was taken on 1/20/2009 and is of the snow covered Engineered Stockpile #2.) 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, January 18-24, 2009, included:

- * Began sealing of Engineered Stockpile #2 liner by EFI (liner contractor). Snow fell on the Site earlier this week and rain froze in sheets on the liner causing delays in completing the liner installation.
- * Received wipe sample results from samples collected after decontamination of two dump trucks and one

long stick excavator. All results were below the decontamination goal of 10 ug/wipe.

Planned Removal Actions

Activities planned for the next reporting period, January 25-31, 2009, include:

- * Complete sealing of Engineered Stockpile #2 liner.
- * Complete the Pre-Final Inspection findings and prepare for site demobilization, including decontamination/wipe sampling of remaining site equipment.
- * Demobilize from the site. Analysis is pending from decontamination fluids and wipe samples taken of the Kobelco 210 excavator.
- * EPA and NCDENR will visit the Site on 1/28/09 for the final inspection.

Next Steps

The schedule for the completion of the removal activities in the January 27, 2009 weekly report from the PRPs' contractor indicated a planned demobilization date of January 28, 2009. In actuality, demobilization occurred on January 30, 2009. One item remains to be completed: disposal of six drums of decontamination fluids that have concentrations of Aroclor 1268 which exceed IP's ability to treat. Disposal options are being evaluated. The draft report of the removal action is scheduled to be submitted to EPA and NCDENR within 30 days of demobilization.

response.epa.gov/holtrachemWWTS