

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

Date: Thursday, February 5, 2009

From: Jennifer Wendel

Subject: On going Removal Activities for 1/19 to 1/26/09

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	7	Site #:	A4AK
Reporting Period:	1/19 to 1/26/09	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 continuing sampling crushed concrete/brick debris.

Shaw continuing the building clearance process; buildings 62 walkthrough identified ten large transformers requiring oil drain confirmation. All are labeled non PCB.

Shaw continuing the building clearance process of building on the east side of the site. Building 62 walkthrough identified ten transformers requiring oil drain confirmation. All are identified as non PCB oils.

DH Griffin (DARI) shipping truckloads of asbestos to Charlotte Motor Speedway Landfill.

DH Griffin shipping loads of scrap metal to DH Griffins Greensboro office for recycling.

DARI continuing asbestos abatement in pipelines on the east side of the site.

DH Griffin continuing demolition of buildings 41,75,87.

DH Griffin continuing crushing operations in the north end of the site.

DH Griffin continuing demolition of slabs 15,21,27,28,29 on the east side of the site.

DH Griffin continuing perimeter dust monitoring.

DRV continuing discharging from the north clarifier into the ASB.

Shaw continuing slab assessment activities in building slabs 14. The building 14 composite indicated elevated arsenic levels and additional sampling concluded that RG's from arsenic were exceeded at three locations.

Based on regulator review, Shaw finalized the Tech Memo discussing elevated arsenic background levels used as fill material in the cellophane area.

Shaw placing clean fill and grading areas disturbed by excavation and load-out activities at the rifle range.

Shaw installing 6 new monitoring wells and completed 12 direct push soil borings around the caustic building slab. Four additional hand auger samples were collected within the footprint of the caustic building down to the groundwater interface. pH readings varied from 12.56 to 13.58.

Shaw clearing and grubbing the south and east ditch transects and marked transects sample locations. Ditch side sampling began in the north end of the east ditch and center deep samples were collected in the east and south ditches. 98 samples were collected from side sampling and 20 from ditch centers. Three deep samples were not collected due to numerous refusals from 1 ½ to 2 feet. Remaining deep samples will be collected using a 2 foot core to insure adequate volume and a more representative matrix. Two of the 18-24" samples have exceeded RG's for mercury, 12 have been analyzed.

Mountain Environmental continuing to remediate OHM, weak liquor was removed from a sump in building 75 and placed in the clarifier.

Planned Removal Actions

Shaw and DH Griffin will continue the building clearance process.

DH Griffin ACM abatement crews will continue working on east end piping.

DH Griffin demolition activities will continue in buildings cleared.

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 crushed debris.

Shaw will continue ditch sampling. Two foot deep ditch center samples and will be collected using a core sampler in addition to the three remaining deep center samples.

Side sampling will continue using a hand auger. The bottom 6” of each sample location will continue to be analyzed on site using and XRF in addition to laboratory analysis for all depths.

Shaw will complete rifle range restoration to include grading, seeding and straw placement. The rifle range closure report activities will begin.

Shaw will continue sub slab analysis and documentation.

State/federal regulators will continue to investigate arsenic soil background levels.

Disposition of Wastes

DH Griffin (DARI) shipped 5 truckloads of asbestos to Charlotte Motor Speedway Landfill totaling 43 tons.

DH Griffin shipped 36 loads of scrap metal weighing 454 tons to DH Griffins Greensboro office for recycling.

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