

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Burlington Industries Cheraw - PRP Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #5
Huckleberry Park Excavation and Hurricane Florence
Burlington Industries Cheraw - PRP Lead
B49F
Cheraw, SC
Latitude: 34.6977213 Longitude: -79.9146074

To: James Webster, USEPA R4 ERRPB
Ken Taylor, SCDHEC

From: Matthew Huyser, On Scene Coordinator

Date: 9/26/2018

Reporting Period: 8/10/2018 - 9/26/2018

1. Introduction

1.1 Background

Site Number:	B49F	Contract Number:	
D.O. Number:		Action Memo Date:	9/20/2017
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	2/19/2018	Start Date:	2/19/2018
Demob Date:		Completion Date:	
CERCLIS ID:	SCN000404896	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-critical removal action; PRP oversight

1.1.2 Site Description

See POLREP #1 dated 3/12/2018 for Site Description information.

1.1.2.1 Location

See POLREP #1 dated 3/12/2018 for Location information.

1.1.2.2 Description of Threat

See POLREP #1 dated 3/12/2018 for Description of Threat information.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1 dated 3/12/2018 for Preliminary Removal Assessment and Removal Site Inspection Results information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During the week of August 13, contractors for Highland began land preparation work in Huckleberry Park and installing short sheet pilings along Wilson Branch Creek. The sheet pilings were intended to prevent runoff of excavated soil from entering the creek. Additional samples were collected around an area of high PCB concentration in the northeast corner of the park in order to delineate the extent of soil that would require disposal as TSCA-regulated waste (above 50 ppm total PCBs).

During site preparation work and sheet piling installation, power service to two homes was intentionally and temporarily shut down to provide safe working conditions for equipment near a power line. A water service line to one residence was accidentally severed during sheet piling installation due to inaccurate marking in a water line location. The water line was repaired by Town of Cheraw Water Services.

Updates to the RAWP, QAPP, and FSAP were received on August 17 and requested changes were submitted on August 21. After changes were implemented the revised documents were approved on August 27.

Excavation of soil at Huckleberry Park was initiated on August 22.

During the week of August 27, an EPA START contractor was mobilized to the Site to document Site

conditions and to collect split samples from clearance samples that were collected by Highland's contractor. The analytical laboratory used by Highland's contractor was changed from the previous laboratory used during site delineation work so initial split sampling began at a 10% interval. These results will be compared to results returned by Highland's contractor and compared to the RPD established in the QAPP; if these criteria are met then split sampling will be reduced to a 5% rate.

OSC Huyser conducted a Site walkthrough on August 30 and observed live-loading of TSCA-regulated soil to the transport truck. OSC Huyser requested that soil on the sidewall of the excavated area and against the sheet piling be sampled for confirmation as well as the bottom of the excavated areas. Results of these samples were reported in the following week and had passed clearance criteria. Excavation was completed on September 1.

During the week of September 3, all remaining stockpiled soil that had been excavated from Huckleberry Park was transported off-site for disposal. Backfilling operations continued at the Park. Site preparation work was initiated at the Highland plant property along the Western ditch, including the removal of trees at the northwest corner of the property.

On September 10th, in preparation for Hurricane Florence, OSC Huyser directed Highland to install sediment control measures at the Site at open excavation and exposed areas. During the previous week approximately 0.8 acres was cleared of trees for excavation of PCB-impacted soil near the Western Ditch. Highland installed silt fencing or waddles along residential properties and silt fence and rock dams along the Western Ditch. Sheet pilings will be removed from the downstream side and the upstream side at Huckleberry Park. Installation of initial backfill material at Highland Park was completed during this week but did not include installation of topsoil or a vegetative cover.

OSC Huyser received an update on site conditions from Highland and its contractors on September 17th. Huckleberry park received flooding up to five feet; flooding also entered at least three homes adjacent to the creek and near the park. Excavation and backfill of the park had been completed but not all sheet piling had been removed, and several pieces of equipment (excavators and trucks) were left at the park and were flooded. Highland's contractor reported on September 18th that a private pond located upstream of the park overflowed and breached resulting in increased floodwater to the Huckleberry Park area. Highland's contractor reported that the Highland property remained stable throughout the storm and rock dams installed in the Western Ditch remained intact. The storm water pond at the Highland filled and overflowed to the Western Ditch. Several yards on Pecan Drive bordering the Western Ditch experienced some flood or water accumulation; these include yards that were part of the EPA-lead removal action in 2017. One homeowner contacted DHEC to ask about potential cross-contamination. Another homeowner on Pecan Drive contacted OSC Huyser and Highland; Highland's contractor conducted a visit to the home on September 18th. One resident with a flooded home near Huckleberry Park contacted OSC Huyser on September 18th to ask about potential cross contamination.

EPA OSC Eichinger mobilized to Cheraw on September 22 to collect samples of sediment in homes near Huckleberry Park that were impacted inside the home by floodwater and experienced an accumulation of sediment. The sample results were returned on August 26 and an emergency response action was initiated (See Site and POLREPs under "Wilson Branch Flood Site").

OSC Huyser mobilize do the Site on September 26 with START to collect samples from residential yards where sediment had accumulated. This includes yards on Pecan Drive, Pinewood Drive, Pine Ridge Drive, Robin Hood Drive, Park Drive, and Sliding Hill Road. Samples were collected on Pecan Drive, Pinewood Drive, and Park Drive on September 26. Additional sampling will be conducted on September 27, including samples from sediment excavated from Wilson Branch by the Town of Cheraw and staged along Sliding Hill Road.

2.1.2 Response Actions to Date

- Submission of RAWP, FSAP, QAPP, and HASP
- Assessment and delineation sample collection
- Additional assessment and delineation sample collection
- Mobilization to Huckleberry Park
- Excavation of Huckleberry Park
- Mobilization to Highland property and Western Ditch

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

An Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action was signed between EPA and Highland Industries for a removal action at the Site.

2.1.4 Progress Metrics

Waste stream volume information is forthcoming and has not been populated.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Highland's contractor has provided an updated work schedule under the final RAWP which is enforceable under the consent agreement. Due to the damage caused by Hurricane Florence, Highland submitted a

Force Majeure written notification on September 24. The upcoming tasks in the proposed revised schedule are listed below:

TASK DUE

Huckleberry Park Site Prep	8/13/2018
Initiate Huckleberry Park Excavation	8/24/2018
Complete Huckleberry Park Excavation/Backfill	11/14/2018
Highland Plant and Western Ditch Site Preparation	11/10/2018
Initiate Highland Plant and Western Ditch Excavation	11/31/2018
Complete Highland Plant and Western Ditch Excavation/Backfill	2/28/2019
Pre-Final Inspection and Punch List	3/4/2019
Final Inspection	3/15/2019

2.2.1.1 Planned Response Activities

- Assessment and delineation of surface and subsurface soils and sediments; (COMPLETE)
- Excavate soils/sediments exceeding 1 ppm total PCBs to a depth of up to 24 inches; (ONGOING)
- Install engineered controls to prevent the transport of any PCBs from the excavated areas; (ONGOING)
- Remove waste materials for proper treatment, recycling, and/or disposal; (ONGOING)
- Restore areas impacted by the removal action to appropriate pre-removal conditions; and,
- Implement post-removal site controls in "Low Occupancy Area" where total PCB exceeds 1 ppm.

2.2.1.2 Next Steps

- Complete Huckleberry Park backfill and vegetation
- Initiation of excavation at Highland Plant and Western Ditch

2.2.2 Issues

Issues regarding damage from Hurricane Florence are provided in previous sections.

2.3 Logistics Section

There is no information to provide in this section.

2.4 Finance Section

2.4.1 Narrative

EPA will be using START to assist with oversight of PRP activities, including documentation, photographs, and sample collection. Approximately \$72,000 of the total START costs to date were expended during the fund-lead removal action in 2017.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$100,000.00	\$96,000.00	\$4,000.00	4.00%
Intramural Costs				
Total Site Costs	\$100,000.00	\$96,000.00	\$4,000.00	4.00%

* 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.

2.5 Other Command Staff

2.5.1 Safety Officer

There is no information to provide in this section.

2.5.2 Liaison Officer

There is no information to provide in this section.

2.5.3 Information Officer

There is no information to provide in this section.

3. Participating Entities

3.1 Unified Command

There is no information to provide in this section.

3.2 Cooperating Agencies

There is no information to provide in this section.

4. Personnel On Site

- EPA (1) periodically
- START (1) periodically
- DHEC (1) periodically
- AECOM (1-2)
- Clean Harbors (5-8)

5. Definition of Terms

There is no information to provide in this section.

6. Additional sources of information**6.1 Internet location of additional information/report**

There is no information to provide in this section.

6.2 Reporting Schedule

Progress reports will be submitted by Highland's contractor on a monthly basis.

POLREPs will be generated and submitted monthly as well.

Weekly conference calls are conducted with Highland's contractors, EPA and DHEC on Fridays at 2pm.

7. Situational Reference Materials

There is no information to provide in this section.