

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #7
Begin Backfilling at Highland Property
Burlington Industries Cheraw - PRP Lead
B49F
Cheraw, SC
Latitude: 34.6977213 Longitude: -79.9146074

To: James Webster, USEPA R4 ERRPB

From: Matthew Huyser, On Scene Coordinator

Date: 12/12/2018

Reporting Period: 11/3/2018-12/7/2018

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 November 5, excavation of nonhazardous soil and TSCA-regulated soil continued at the Highland Property. Sheet piling that had been removed from Huckleberry Park were cleaned and wash water was collected for off-site disposal.

Due to excessive rainfall, no work was conducted at the Site during the week of November 12.

Contractors for Highland demobilized during the week of November 19th for the Thanksgiving holiday then returned on November 26. During the week of November 26, trees were cleared along the banks of the Western Ditch and the retention pond at the Highland property was dewatered in preparation for excavation activities. Additional rock "check dams" were installed in the Western Ditch. Backfilling began at the Highland property in areas where excavation is complete. Grading and restoration activities resumed at Huckleberry Park.

During the week of December 3, no work was been conducted at Huckleberry Park due to excessive rainfall which has brought the water table at the park to 6 inches below ground surface. Backfilling continues at the Highland property. The retention pond was excavated to a depth of 2 feet which includes both nonhazardous and TSCA-regulated remediation waste soil. Backfilling and reconstruction of the retention pond will be completed before excavation begins on the Western Ditch.

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
- Removal of soil "mounds" near Western Ditch
- Begin restoration of Huckleberry Park
- Begin excavation at Highland property
- Begin backfill at Highland property

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; (ONGOING)
- Implement post-removal site controls in "Low Occupancy Area" where total PCB exceeds 1 ppm.

2.2.1.2 Next Steps

- Complete Huckleberry Park restoration
- Complete excavation and backfill at Highland property
- Initiate excavation of Western Ditch

2.2.2 Issues

In response to a letter from U.S. Senator Lindsay Graham to EPA regarding questions from residents in Cheraw about the Site, a draft response letter was prepared and forwarded to the EPA Region 4 Congressional Affairs office.

Under a verbal agreement between the EPA and Highland Industries, sod from four lawns along the Western Ditch that were found to be impacted with PCBs following Hurricane Florence will be removed by EPA's ERRS contractors working at the Cheraw Flood Site and will be staged at the stockpiles at the Burlington Industries Cheraw Site for disposal under the existing waste profile used by contractors for Highland. The impacted areas were previously cleaned by EPA under the fund-lead Burlington Industries Cheraw removal action in 2017. On November 26, EPA with START and ERRS contractors collected samples of soil underneath the sod at the four properties to determine if additional excavation would be necessary after the sod was removed. No sample exceeded the cleanup goal of 1 ppm total PCBs so OSC Huyser determined that additional excavation would not be necessary. Volumes of sod removed under this effort will be reported in the Progress Metrics section of POLREPs for the Cheraw Flood Site.

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 *

		Total To		%
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	Budgeted	Date	Remaining	Remaining
Extramural Costs				
TAT/START	\$130,000.00	\$127,000.00	\$3,000.00	2.31%
Intramural Costs				
Total Site Costs	\$130,000.00	\$127,000.00	\$3,000.00	2.31%

* 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

Information relevant to this Site will be reported at https://response.epa.gov/BIC_PRP

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

The following pages contain relevant information relating to the Site:

<https://response.epa.gov/BIC>
<https://response.epa.gov/CherawFlood>
<https://response.epa.gov/WilsonBranchFloodingSite>
<https://response.epa.gov/WilsonBranchRelease>