

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
May update
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: 5/29/2018

Reporting Period: 4/18/2018 - 5/29/2018

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

Split sample data that was collected by EPA's START contractor during the first two sampling events after the signature of the consent agreement has been compared with Highland data. Split samples were collected at a rate of 10%; the quality assurance project plan (QAPP) stated that this would be reduced to a rate of 5% if the relative percent difference (RPD) was consistently below 50%. Values found above 50% RPD were found to occur at low concentrations with Total PCBs below 1000 ug/kg and would not affect the decision outcome; therefore OSC Huyser determined that the split sampling rate could be reduced for future sampling events.

Highland's contractor collected additional characterization samples from the Highland property on May 23 and 24. No additional samples were taken from the western ditch or Huckleberry park.

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

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

There has been no waste removed from the Site under the PRP-lead removal action

<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. The upcoming tasks in the schedule are listed below:

TASK	START - END
Laboratory Analysis	2/27/2018 - 6/7/2018
Sample Data Review, Validation, and Compilation	3/26/2018 - 6/21/2018
Final Excavation Limits to be Defined	5/7/2018 - 6/21/2018
Prepare Request for Proposal (RFP)	5/7/2018 - 5/25/2018
Submit RFP to Contractors	5/28/2018 - 5/28/2018
Proposal Timeline	5/28/2018 - 6/22/2018
Proposal Review	6/22/2018 - 6/28/2018
Contractor Selection / Award	6/28/2018 - 6/28/2018

2.2.1.1 Planned Response Activities

- Assessment and delineation of surface and subsurface soils and sediments; (ONGOING)
- Excavate soils/sediments exceeding 1 ppm total PCBs to a depth of up to 24 inches;
- Install engineered controls to prevent the transport of any PCBs from the excavated areas;
- Remove waste materials for proper treatment, recycling, and/or disposal;
- 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

Highland's contractor will complete laboratory analysis, data review, and delineation of excavation limits from the samples that were collected.

Highland will prepare and distribute a request for proposal to removal contractors.

2.2.2 Issues

On May 15, 2018, OSC Huyser provided notification to Highland that several milestones within the removal action work plan project schedule had been missed. These tasks include: (1) Sample data review, validation, and completion; (2) final excavation limits defined; (3) prepare request for proposal to contractors; (4) submit request for proposal to contractors; and (5) provide a monthly progress report for the month of April. Highland and its contractors responded with a monthly progress report on May 21, 2018 that included a proposed update to the project schedule. Justification for the delay included inclement weather for sampling, requirements for a third sampling event to delineate excavation limits, and communication delays in approval process for the progress report; only inclement weather was accepted as a sufficient justification for delay. The proposed modified schedule will overlap tasks to reduce overall project delay from three weeks to only one week. OSC Huyser approved the modified schedule on May 25.

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

Personnel have demobilized from the Site at the time of this report.

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.

7. Situational Reference Materials

There is no information to provide in this section.