

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #6  
Post-Florence Operations  
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:** 12/5/2018

**Reporting Period:** 9/27/2018-11/2/2018

## 1. Introduction

### 1.1 Background

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

#### 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 September 24, contractors for Highland completed excavation of soil "mounds" adjacent to the Western Ditch. A haul road and stockpile areas were constructed on the Highland property in preparation for excavation work.

During the week of October 1 excavation areas at the Highland property were marked and excavation began on areas containing TSCA-regulated remediation waste soil. Contractors for Highland collected a water sample from the stormwater retention pond at the Highland Property; analytical reported no detections for PCBs in the water. In Huckleberry Park, samples were taken from sediments that were deposited from Hurricane Florence flooding and laboratory analytical results confirmed that no sediments above the cleanup goal of 1 part per million (ppm) Total PCBs were deposited in the park. Based on these results OSC Huyser issued approval to resume backfill and restoration activities in the Park.

During the week of October 8, no work was conducted at Huckleberry Park due to localized flooding from Hurricane Michael. At the Highland property, excavation of nonhazardous soil and TSCA-regulated remediation waste soil resumed.

During the week of October 16, excavation of nonhazardous soil and TSCA-regulated soil continued at the Highland property. Excavation areas were extended following confirmation sample results and reached depths of 4 feet in some areas. Due to flooding that occurred in Huckleberry Park during Hurricane Michael, additional samples were taken of sediments from the same areas where samples had been collected two weeks prior following Hurricane Florence. Analytical results showed no detections of PCBs above the cleanup goal of 1 ppm Total PCBs. OSC Huyser provided approval to Highland and its contractors resume

restoration activities in the park

During the week of October 22, restoration activities resumed at Huckleberry Park including backfilling, grading, and removal of sheet piling which was completed on October 23. Excavation of nonhazardous soil and TSCA-regulated soil continued at the Highland Property. EPA START contractor was mobilized to the Site on October 23 to collect split-samples of confirmation soil samples being taken during the course of the excavation.

On October 26, OSC Huyser received a phone call from a resident near the Highland property who reported dust observed in the area and adverse health effects to children and family. OSC Huyser notified contractors for Highland that a complaint had been received and that measures should be taken to ensure that dust suppression is being utilized during excavation activities, in excavated areas, and on stockpiled waste materials. On November 2, OSC Huyser and START deployed an EBAM dust monitor in a nearby residential yard which transmit data in real time to a EPA Environmental Response Team (ERT) server and will be remotely monitored by OSC Huyser.

**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

**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**

From September 24 to October 7, EPA collected samples from residential yards along the Western Ditch and the continuing surface water path to Huckleberry Park. Samples collected by EPA were composites targeted towards visible sediment that was likely deposited by floodwater or low-lying areas where floodwater would have settled in a lawn. Results from these samples found four residential yards on Pecan Drive that were cleaned up in 2017 but, after the hurricane, had become re-contaminated above the cleanup goal of 1 ppm total PCBs. Arrangements are being made to remove the contaminated surfaces in conjunction with the ongoing removal action. A fifth yard on Pinewood Drive, which was not cleaned up in 2017, yielded a sample result above the EPA Region 4 RML for residential soil. That yard is being addressed and reported under the site name: Cheraw Flood Site.

OSC Huyser visited the Site with RPM Crowley on October 25. During the visit, OSC Huyser observed deposits of a green rubbery material in a 1-foot excavation near the above-ground storage tank on the east

border of the Highland property. Samples of the material were collected by Highland's contractors and EPA START contractor; additional excavation will be conducted as necessary. The green material shared characteristics with a material previously found on the adjacent property which once contained Burlington Industries' drying beds, however none of the material had previously been observed on the Highland property and the pieces in the newly uncovered area were significantly larger than any other pieces previously found. The material occurred in large chunks, thin cakes, and discolored soil. A "seam" of waste and discolored soil was observed on the south end of the excavated area, between the tank and the Highland facility, approximately 6 inches below the surface and 3 inches thick, extending approximately 40 feet wide. The greatest mass of material along this seam was observed directly above the buried piping between the tank and the facility, but there is no information that would provide a relationship between the two features.

**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
<b>Extramural Costs</b>				
TAT/START	\$130,000.00	\$127,000.00	\$3,000.00	2.31%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$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**

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.