

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #8
Begin Excavation of Western Ditch
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: 2/19/2019

Reporting Period: 12/8/2018 - 2/15/2019

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 Action
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 December 10, no work was conducted at Huckleberry Park due to excessive rainfall which brought the water table in the park to 6 inches bgs. Backfilling continued at the Highland property south of propane tanks. The retention pond at the Highland property was drained and was excavated to a depth of 2 feet which included both nonhazardous and TSCA-regulated waste soil. The ground surface is considered the elevation of the pond after draining which includes any deposited sediment. However, restoration will return the pond to design grade storage capacity. No liner or bentonite layer is required in pond restoration. Post-excavation confirmation sampling conducted in the pond yielded results above the cleanup goal of 1 ppm Total PCBs in several areas and additional excavation was initiated in 1-foot intervals. Areas of the berm that were excavated (between the retention pond and the Western Ditch) originally contained sandy soil but will be replaced with clay. Wood that was removed from the Western Ditch has been chipped and is staged on-Site for ground cover use.

During the week of December 17, OSC Huyser visited the Site to provide oversight of activities. Huckleberry Park was hydroseeded to provide stabilization of soil while crews await drier conditions to complete grading. Backfilling continued at the Highland property. Excavation continued in the retention pond and the berm between the pond and the Western Ditch was removed.

Contractors for Highland temporarily demobilized on December 22. Work was scheduled to resume on January 3 but was delayed due to heavy rainfall.

During the week of January 7, additional grass seed was spread at Huckleberry Park to augment areas

where hydroseed had been washed away, and sediment control fences at the Park were repaired. Excavation continued at the Highland property in the retention pond and berm between the pond and the Western Ditch. Clay for the pond and berm reconstruction will be obtained from unexcavated/unimpacted areas north of the above-ground storage tank.

During the week of January 14, hand seeding and sediment control repairs were conducted at Huckleberry Park. Excavation continued at the Highland property in the retention pond and berm between the pond and the Western Ditch. Additional check dams were installed in the Western Ditch in preparation for excavation activities. The check dams are constructed of #2 stone and are typically 12-18 inches high across the base of the ditch. Milled asphalt was obtained from the Chesterfield Highway repaving project and being used to construct the haul road around the Western Ditch as well as berms around the waste soil stockpile.

During the week of January 21, reconstruction was initiated on the retention pond and berm between the pond and the Western Ditch. Repairs were made to the retention pond outfall structures. Excavation was initiated between the propane tank and the blending house.

During the week of January 28, contractors for Highland excavated approximately 600 feet of the Western Ditch to an initial depth of 2 feet. Post-excavation confirmation sampling yielded results above the cleanup goal of 1 ppm Total PCBs in several areas alongside and downstream of the retention pond; additional excavation will be conducted in 1-foot intervals. Samples were collected along six segments with three samples per segment (bank, bottom, and bank) for a total of 18 samples. Reconstruction of the retention pond and berm between the pond and the Western Ditch continued. Based on confirmation sample results above the cleanup goal of 1 ppm, additional excavation was conducted behind the blending house. Two soil piles (aka "mounds") along the bank of the Western Ditch on the former drying bed property were removed for disposal. A manhole and unrelated concrete pipe were uncovered during excavation activities west of the retention pond. OSC Huyser deployed a START contractor to collect photographs and collect split samples of confirmation samples at the Site.

During the week of February 4, OSC Huyser and DHEC visited the Site to oversee Site operations and meet with residents. Reconstruction of the retention pond and berm between the pond and the Western Ditch continued. OSC Huyser approved an extension of the project timeline which moved completion of the restoration activities to mid-April. An additional extension will likely be needed if rain delays totaling more than one week are encountered. Additional hydroseeding was conducted in Huckleberry Park to continue control of ground surfaces; the ground remains too wet to complete final grading and restoration. The concrete pipe that was uncovered the previous week originates in a direction from the facility to the Western Ditch. It is located approximately 50 feet upstream from the west edge of the retention pond and terminates at an uncovered concrete pad approximately 4 feet square in the Western Ditch. No flow or fluid was observed in the pipe which was clogged with soil. Samples were collected from the material inside the pipe and from the walls of the pipe. The uncovered pipe was removed and set aside for disposal profiling. The manhole which was uncovered was adjacent to the northern truck road at the facility. Rainwater in the manhole determined that it was hydraulically connected to the drainage system in the parking lot and was covered over time by overgrowth. The manhole will be left exposed when backfilling occurs.

During the week of February 11, backfilling was completed near the above-ground storage tank and near the blending house. Erosion control matting was installed on excavated area of the Western Ditch up to the area adjacent to the retention pond where additional excavation is ongoing. Additional excavations will be completed and confirmed to the cleanup goal of 1 ppm Total PCBs then backfilled and installed with erosion control measures before additional segments of the Western Ditch are excavated. Further segments will be 200-300 feet in length and total excavation may be completed with two weeks of cumulative work at the Site. Due to anticipated rainfall, no work will be conducted at the Site for the week of February 18.

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
- Excavation of retention pond at Highland property
- Begin restoration of retention pond at Highland property
- Begin excavation of Western Ditch
- Begin restoration of 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

Soil disposal numbers are current up to December 19, 2018

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Nonhazardous Soil	Soil	1124.89 tons	multiple	disposal	
TSCA-regulated soil	Soil	2577.22 tons	multiple	disposal	

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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	12/19/2018
Highland Plant and Western Ditch Site Preparation	11/24/2018
Initiate Highland Plant and Western Ditch Excavation	12/20/2018
Complete Highland Plant and Western Ditch Excavation/Backfill	3/28/2019
Pre-Final Inspection and Punch List	4/2/2019
Final Inspection	4/16/2019

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 backfill at Highland property
- Complete excavation of segment 1 in Western Ditch
- Begin excavation of segment 2 in Western Ditch

2.2.2 Issues

OSC Huyser verbally informed Highland and contractors for Highland that the EPA would not require backfilling of excavations along the banks of the Western Ditch in undeveloped properties provided that (1) the cleanup goal of 1 ppm Total PCBs were met in the excavation area, (2) permission of the property owner was obtained, and (3) bank slopes met local and state regulatory requirements. The purpose in not backfilling these areas would be to provide a wider channel space which would result in greater storage capacity and lower flow velocity. These conditions would result in lower flooding risks to nearby and downstream residents.

OSC Huyser was absent from the Site and from weekly update calls from December 22 to January 25 due to the federal government shutdown. Reports on Site activities during that timeframe are obtained from weekly progress reports submitted by contractors for Highland and confirmed by Site visits from OSC Huyser following the shutdown.

START collected samples from the western ditch in an area near sample BL-DS-06 and BL-DS-09 which were collected by DHEC in 2016. The samples were collected across a depth of 0-12 inches. These DHEC samples were among the highest concentrations of total PCBs that were measured at the Site. The samples will be held in storage and may be used for congener analysis or other purposes.

Orange 4x4 post property markers for properties along Robin Hood Drive were uncovered when brush was removed from the Western Ditch. OSC Huyser directed that the property markers should be returned to their original location following excavation of the Western Ditch.

AECOM will review installation of permanent check dam structures in the Western Ditch following restoration for the purpose of retarding flow and alleviating pressure downstream.

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	\$160,000.00	\$136,078.53	\$23,921.47	14.95%
Intramural Costs				
Total Site Costs	\$160,000.00	\$136,078.53	\$23,921.47	14.95%

* 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

BGS - below ground surface
DHEC - south carolina department of health and environmental control
mg/kg - milligram per kilogram (used synonymously with ppm)
OSC - on-scene coordinator
PCB - polychlorinated biphenyls
PPB - parts per billion (used synonymously with µg/kg)
PPM - parts per million (used synonymously with mg/kg)
RML - EPA regional removal management level
START - superfund technical assessment and response team (EPA contract)
TSCA - toxic substances control act
µg/kg - microgram per kilogram (used synonymously with ppb)

AOC (aka, "agreement", "settlement agreement") - administrative settlement agreement and order on consent for removal action between EPA and Highland Industries Inc, CERCLA docket number 04-2017-3759, effective date 10/21/2017

Huckleberry Park - shall mean the public park located on Huckleberry Drive, owned by the Town of Cheraw, South Carolina, Parcel ID Number 258 008 005 002

Western Ditch - drainage ditch that originates at 34.69700610 degrees north latitude and 79.9 155 1837 degrees west longitude and flows downgradient in a northerly direction for about one thousand nine hundred (1.900) feet where it approaches the northeastern corner of Parcel ID Number 258 014 003 021 and meets an easterly-flowing unnamed intermittent creek at approximately 34.70098479 degrees north latitude and 79.91238320 degrees west longitude.

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>