



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV**

Subject: POLREP #3
Excavation initiated in fourth and fifth parcels
Burlington Industries Cheraw
B49F
Cheraw, SC
Latitude: 34.6977213 Longitude: -79.9146074

To: James Webster, USEPA R4 ERRPB

From: Matthew Huyser, On Scene Coordinator

Date: 6/21/2017

Reporting Period: 6/16/2017 - 6/22/2017

1. Introduction

1.1 Background

Site Number:	B49F	Contract Number:	
D.O. Number:		Action Memo Date:	4/25/2016
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/5/2017	Start Date:	6/6/2017
Demob Date:		Completion Date:	
CERCLIS ID:	SCN000404896	RCRIS ID:	
ERNS No.:		State Notification:	10/4/2016
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The South Carolina Department of Health and Environmental Control (DHEC) conducted sampling under a Preliminary Assessment (PA) and discovered the presence of Polychlorinated Biphenyls (PCBs) in residential and industrial surface soils near the former Burlington Industries facility, as well as in the drainage ditch and surface water corridor to the Pee Dee River. Public and private properties throughout the surface water corridor. An Action Memorandum for initial time-critical removal action was signed on April 25, 2017. Initial activities include cleanup to address at least six residential properties with concentrations of PCBs greater than 10 times the respective EPA Region 4 Removal Management Level (RML).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

1.1.2.1 Location

The former Burlington Industries facility is currently owned by Highland Industries, Inc. and is located at 650 Chesterfield Highway, Cheraw, Chesterfield County, South Carolina.

1.1.2.2 Description of Threat

Part 302.4 of Title 40 in the Code of Federal Regulations lists PCBs as a hazardous substance under section 102(a) of CERCLA, a toxic pollutant under section 307(a) of the CWA, and as a hazardous air pollutant under section 112 of the CAA. PCBs are also listed as a toxic chemical through section 313 of EPCRA and determined to present an unreasonable risk of injury to health and or the environment under section 2605(e) of the Toxic Substances Control Act (TSCA).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

PCB Aroclors 1248 and 1254 were found throughout the Site with highest concentrations near the ditch at the west boundary of the former Burlington Industries facility, followed by decreasing concentrations throughout the surface water drainage corridor.

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During the week of 2004, crews initiated excavation in the fourth and fifth parcels on Pecan Drive. Brush and small trees were cleared from both lots. A large tree was removed from 244 Pecan Dr. at the request and permission of the homeowner in order to provide direct access for trucks at the end of the driveway. Access was established in 244 Pecan Dr. and excavation began at 246 Pecan Dr. Three "hotspots" were initially excavated from 246 Pecan Dr.; these are areas where sampling and screening data indicated the presence of soils with total PCB concentrations in excess of 50,000 ug/kg. Two sheds were relocated at 246 Pecan Dr. to a location specified by the homeowner.

Excavation activities did not continue on June 21 due to the accumulation of rain throughout the previous two days which had rendered the two yards impassable without severe rutting. Backfilling activities in the first three parcels also did not continue. On June 21, brush was cleared from 252 Pecan Dr. and playground equipment at Huckleberry Park was dismantled. Excavation resumed on June 22 and excavation at 246 Pecan Dr. was completed by the end of the day.

193.13 tons of TSCA PCB waste was loaded for transportation and disposal to Wayne Disposal #2 Landfill in Belleville, MI from June 20 to June 21. Approximately 330 tons of non-TSCA PCB soil will be loaded for transportation and disposal to Lee County Landfill in Bishopville, SC on June 22.

START continued to delineate and mark excavation areas based on digital maps and locations representing sample results from DHEC and EPA samples that were collected. Two clearance samples were collected and sent for laboratory analysis on June 16. All clearance samples were received for the first three parcels by June 20. (see section 2.2.2.)

Cleanup criteria remains at 1,000 ug/kg and soils with total PCB concentrations in excess of 50,000 ug/kg are excavated separately and staged for disposal in a segregated stockpile.

In response to a call and request from a resident on June 20, a sample was collected on June 21 from a segment of Wilson Branch in a location that is upstream of the confluence between Wilson Branch and the surface water pathway from the northwest segment of the former Burlington facility. Concerns about this segment of Wilson Branch were discussed twice during the public meeting on June 1.

2.1.2 Response Actions to Date

232 Pecan - Excavation 100% complete. 4 clearance samples taken. Backfilling initiated.
 234 Pecan - Excavation 100% complete. 4 clearance samples taken. Backfilling initiated.
 238 Pecan - Excavation 100% complete. 2 clearance samples taken. Backfilling initiated.
 244 Pecan - Excavation 100% complete.
 246 Pecan - Excavation initiated. Hotspot (>50,000 ug/kg) excavation complete.
 252 Pecan - Delineation complete. Brush and debris cleared.

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

Enforcement and negotiation activities are ongoing

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Brush		24.32 tons			Local Class II (C&D) Landfill
Non-TSCA Soil		994.6 tons			Lee County Landfill, SC
TSCA PCB Soil		313.15 tons			Wayne Disposal #2 Landfill, MI

2.2 Planning Section

2.2.1 Anticipated Activities

The current time-critical removal action is targeted at occupied residential properties which have PCB concentrations that exceed 10 times the EPA Region 4 Removal Management Level ("Tier I") as well as areas of Huckleberry Park that exceed the PCB RML ("Tier II").

2.2.1.1 Planned Response Activities

- Excavate surface soils and contaminated with PCBs from residential properties which meet Tier I criteria; (ONGOING)
- Remove play units and sand from Huckleberry Park which meet Tier II criteria;
- Provide temporary staging of excavated PCB-contaminated soil/sediment between removal and disposal activities; (ONGOING)
- Load and transport PCB-contaminated soil/sediment to an offsite location for treatment and/or disposal;
- Replace excavated soil with clean backfill and vegetation; and
- Restore impacted properties to the extent practicable.

2.2.1.2 Next Steps

Excavation will be completed on 244 and 246 Pecan Dr by June 30. Back-fill will be completed on 232, 234, and 238 Pecan Dr by June 30; sod installation will begin on back-filled areas as soon as practicable.

OSC Swanson will be on Site in place of OSC Huyser during the week of June 26. All crews will temporarily demobilize for the July 4th holiday during the week of July 3.

2.2.2 Issues

START is delineating and marking excavation areas based on digital maps and locations representing sample results from DHEC and EPA samples that were collected. Excavation is being conducted in 6-inch "lifts". EPA samples provide a higher density of sample location but lower accuracy at low concentrations. Composites of the EPA samples were sent for laboratory analysis to verify the screening method and provide way to generate a correction factor. The composites were created based on relative screening concentration and geographical location at the Site, thus the laboratory results also provide a description of the PCB concentration in the area represented by the composite. Interpretation of these results and translation to an excavation area is not simple and requires understanding of the source and limitations of the material. A report will be generated and submitted to the Site File which will document the method used

for validation and interpretation.

All clearance sample were received for the first three parcels by June 20. Of 10 samples collected, five showed no detection for PCBs, one yielded total PCB concentration below 1,000 ug/kg, and the remaining four yielded total PCB concentrations of 1,060 ug/kg, 1,280 ug/kg, 1,900 ug/kg, and 2,560 ug/kg. Samples were collected as 5-point composites. All data, including aliquot depth for the composite, was provided to the EPA Region 4 Scientific Support Section for review. The clearance results were determined to have met the cleanup target based on an expanded evaluation of excavation depths at or below the surface soil definition of 12-inches, the average concentration over a parcel, comparison to individual aroclor RMLs, and/or the average concentration of aroclors within a sample.

2.3 Logistics Section

No information to report in this section

2.4 Finance Section

2.4.1 Narrative

An action memorandum was signed on April 25, 2017. Initial funding was provided for ERRS and START contracts in the amount represented in the table below.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$600,000.00	\$293,824.92	\$306,175.08	51.03%
TAT/START	\$25,000.00	\$18,000.00	\$7,000.00	28.00%
Intramural Costs				
Total Site Costs	\$625,000.00	\$311,824.92	\$313,175.08	50.11%

* 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

ERRS and START have each produced a HASP for their activities.

2.5.2 Liaison Officer

No information to report in this section

2.5.3 Information Officer

No information to report in this section

3. Participating Entities

3.1 Unified Command

No information to report in this section

3.2 Cooperating Agencies

Town of Cheraw
South Carolina DHEC

4. Personnel On Site

EPA (2)
ERRS (9)
START (2)
DHEC (1 intermittent)

5. Definition of Terms

No information to report in this section

6. Additional sources of information

6.1 Internet location of additional information/report

No information to report in this section

6.2 Reporting Schedule

POLREPs will be generated and submitted weekly

7. Situational Reference Materials

No information to report in this section