



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV**

Subject: POLREP #6
Additional Properties Planned for Removal
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: 7/20/2017

Reporting Period: 7/14/2017 - 7/20/2017

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

On July 13, installation of sod was completed on 232, 234, and 238 Pecan Drive. A second round confirmation sample results were received for the area in 244 Pecan Drive which was excavated an additional 6-inches on July 11; the results showed that the cleanup criteria of 1 ppm had been achieved and backfilling commenced on July 14. Backfilling in 244 and 246 Pecan Drive was completed on July 15.

On July 17, excavation was initiated in 248 Pecan Drive with access established through the driveway of 252 Pecan Drive. An area in the southeast corner of 248 Pecan Drive with limited sample results information was excavated to a depth of only 6 inches and a confirmation sample was collected to determine if additional excavation was necessary.

A continuous silt fence was installed on July 20 at the back of 244 and 246 Pecan properties where backfill installation has been completed, set back approximately 5-10 feet from the ditch, to discourage migration of sediment from the ditch to the residential yard in the event that a flooding event occurs prior to remediation of contaminated soils in the ditch. Sod installation in these properties will begin on July 21.

Approximately 306 tons of TSCA PCB soil was loaded for transportation and disposal to Heritage Landfill in Roachdale, IN on July 18. Beginning on July 18, the Heritage Landfill in Roachdale, Indiana replaces the Wayne Disposal #2 Landfill in Belleville, Michigan as the disposal location for TSCA PCB soil generated at the Site.

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. The remaining volume in the existing topsoil source will not be sufficient for the remainder of the removal action. EPA OSC Huyser and START collected a sample from a second topsoil source on July 19.

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.

2.1.2 Response Actions to Date

- 232 Pecan - Excavation, backfilling, and sod 100% complete.
- 234 Pecan - Excavation, backfilling, and sod 100% complete.
- 238 Pecan - Excavation, backfilling, and sod 100% complete.
- 244 Pecan - Excavation and backfilling 100% complete. Awaiting sod
- 246 Pecan - Excavation and backfilling 100% complete. Awaiting sod
- 248 Pecan - Excavation 50% 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		2139.78 tons			Lee County Landfill, SC
TSCA PCB Soil		1000.79 tons			Wayne Disposal #2 Landfill, MI and/or Heritage Landfill Roachdale, IN

2.2 Planning Section

2.2.1 Anticipated Activities

A ceiling increase and change of scope action memorandum was signed on July 13. The revised time-critical removal action is targeted at occupied residential properties which have PCB concentrations that exceed the EPA Region 4 Removal Management Level as well as areas of Huckleberry Park. This brings the total residential parcels targeted for cleanup under this removal action from six to fourteen.

2.2.1.1 Planned Response Activities

- Excavate surface soils and contaminated with PCBs from residential properties which exceed the EPA RML; (ONGOING)
- Remove play units and sand from Huckleberry Park; (COMPLETE)
- 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; (ONGOING)
- Replace excavated soil with clean backfill and vegetation; and (ONGOING)
- Restore impacted properties to the extent practicable. (ONGOING)

2.2.1.2 Next Steps

EPA OSC Huyser met with property owners and tenants for four properties which were added under the July 13 ceiling increase and change of scope action memorandum. Only owners and tenants two remaining properties could not be reached

Excavation will migrate from 248 Pecan Drive to the adjacent properties at 252, 254, and 256 Pecan Drive.

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.

2.3 Logistics Section

No information to report in this section

2.4 Finance Section

2.4.1 Narrative

The original action memorandum was signed on April 25, 2017 and a ceiling increase and change of scope action memorandum was signed on July 13, 2017. Funding has been 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	\$799,441.00	\$674,763.22	\$124,677.78	15.60%
TAT/START	\$50,000.00	\$26,000.00	\$24,000.00	48.00%
Intramural Costs				
Total Site Costs	\$849,441.00	\$700,763.22	\$148,677.78	17.50%

* 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 (1)
ERRS (10)
START (1)
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