

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #4
Pre-Construction Meeting and Mobilization
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: 8/10/2018

Reporting Period: 7/30/2018 - 8/10/2018

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

Highland selected Clean Harbors Inc as their environmental response construction contractor on July 12, 2018. EPA OSC Huyser and DHEC met with Highland and their contractors (AECOM and Clean Harbors) for a pre-construction meeting on July 30, 2018. During the meeting, Highland's contractors presented their removal plans according to the approved RAWP. Activities were set to begin in Huckleberry Park and then proceed afterwards to the Highland Property and then to the western ditch. Arrangements were made for specific locations and utility services for staging areas and office trailers. A Site walkthrough was conducted with all parties to discuss fine details of topography, obstacles, and groundtruthing landmarks listed in the RAWP.

Drainage of the western surface water retention pond was discussed with EPA and DHEC. Highland agreed to pump and/or drain the pond to the storm water ditch located on the northeast side of the plant property during the duration of the removal at the Highland Plant and western ditch. The discharge would be conducted in a manner that would prevent agitation of sediment from the pond, as well as reduce turbulence and scouring of sediment at the discharge. Water will be monitored according to the facility's NPDES permit and analysis will be conducted to ensure PCBs are not discharged.

Highland's contractors mobilized to begin work at Huckleberry Park on August 6, 2018. OSC Huyser visited the Site on August 9, 2018 and observed that the park had been surrounded with construction fencing and that sheet piling and erosion control logs had been delivered. The Town of Cheraw Water was in the process of relocating a water line at the south end of the park; a water service line was discovered within the excavation footprint which was previously believed to have been outside the footprint. The Town of Cheraw tapped and capped the existing line, then installed a new line outside the excavation area.

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

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

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

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	DUE
Huckleberry Park Site Prep	8/13/2018
Initiate Huckleberry Park Excavation	8/24/2018
Complete Huckleberry Park Excavation/Backfill	10/15/2018
Highland Plant and Western Ditch Site Preparation	10/11/2018
Initiate Highland Plant and Western Ditch Excavation	10/30/2018
Complete Highland Plant and Western Ditch Excavation/Backfill	1/21/2019
Pre-Final Inspection and Punch List	1/23/2019
Final Inspection	1/28/2019

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;
- 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

- Installation of temporary sheet piling at Huckleberry Park
- Initiation of excavation at Huckleberry Park

2.2.2 Issues

On July 19, 2018, OSC Huyser provided notification to Highland and its contractor that several schedule delays had occurred and would occur which were not documented in the June progress report. OSC Huyser stated that since the current delays were administrative in nature and not related to unforeseen circumstances such as extreme weather or an unknown obstacle encountered during an excavation, the task target completion date for "excavation, removal, and restoration" of January 18, 2019, should not be affected by the current delays. A revised schedule was submitted on August 2, 2018, following the pre-construction conference.

Highland's contractor is in the process of updating and submitting a revised QAPP which will request approved use of additional laboratories including a mobile laboratory at the Site for swift turnaround of confirmation samples.

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

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.

7. Situational Reference Materials

There is no information to provide in this section.