



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV**

Subject: POLREP #2
Excavation in first three yards completed
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: 6/15/2017

Reporting Period: 6/9/2017 - 6/15/2017

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, ERRS crews completed surface excavation in the first three yards on Pecan Drive. Maximum excavation depth was 30-inches and minimum excavation depth was a surface scrape. A majority of excavation depths occurred at 6-inches and 12-inches below ground surface. Disturbed surfaces where vehicles may have tracked contaminated soil were scraped to remove potential contaminants. 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.

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.

Six clearance samples were collected and sent for laboratory analysis. An additional two clearance samples will be collected on Monday, June 19, to complete clearance sampling for the first three yards. Two clearance sample results were received during this reporting period and yielded no results for PCBs.

Large trees adjacent to the ditch are being preserved. In order to prevent drying and damage to large trees along the ditch bank with exposed roots where excavation had taken place, topsoil was installed over the roots on June 15. The installation of topsoil occurred prior to the receipt of confirmation sample results from this area but was deemed necessary to prevent premature death of the trees. It is understood that the ditch will eventually have to be cleaned and excavated; at that time many trees along the ditch bank will be removed due to unavoidable root damage.

Results were received from a composite surface soil sample on an unoccupied residential parcel on Park Drive that was collected in response to a direct request from the property owner. Results yielded 130 ug/kg of Aroclor 1254 which is below the EPA Region 4 RML and below the cleanup level of 1,000 ug/kg Total PCB. A composite sample was also taken from the surface (0-3") of Sliding Hill Road, which is an unpaved residential road; results from this sample yielded 240 ug/kg of Aroclor 1248, 160 ug/kg of Aroclor 1254, and 56 ug/kg of Aroclor 1260. These are also below the RML and cleanup levels.

2.1.2 Response Actions to Date

- 232 Pecan - Excavation 100% complete. 4 clearance samples taken
- 234 Pecan - Excavation 100% complete. 2 clearance samples taken; 2 more planned.
- 238 Pecan - Excavation 100% complete. 2 clearance samples taken.
- 244 Pecan - delineation complete. Large tree removed for access.
- 246 Pecan - delineation complete
- 252 Pecan - delineation complete.

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		5.86 tons			Local Class II (C&D) Landfill
Non-TSCA Soil		841.1 tons			Lee County Landfill, SC
TSCA PCB Soil		230.15 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 proceed with the residences on Pecan Drive. Backfill and vegetation restoration will be conducted after clearance sample results are received and reviewed.

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

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	\$214,970.03	\$385,029.97	64.17%
TAT/START	\$25,000.00	\$7,000.00	\$18,000.00	72.00%
Intramural Costs				
Total Site Costs	\$625,000.00	\$221,970.03	\$403,029.97	64.48%

* 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. OSC Huyser will produce a combined HASP for the Site based on ERRPB SOGs.

2.5.2 Liaison Officer

No information to report in this section

2.5.3 Information Officer

Letters were sent to property owners and tenants in properties identified as Tier II properties which contained soils with sample results that exceeded the EPA Region 4 RML but did not exceed the Tier I criteria identified as ten times the EPA Region 4 RML. These letters were generated in direct response to a request received from residents during the June 1 public meeting.

Copies of the Community Questionnaire that were completed on May 10 were distributed to corresponding property owners and tenants.

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 (9)
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