



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #9  
Completion of 12th Property  
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:** 9/6/2017

**Reporting Period:** 8/18/2017 - 8/31/2017

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B49F	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	7/13/2017
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	6/5/2017	<b>Start Date:</b>	6/6/2017
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	SCN000404896	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	10/4/2016
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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, 2017 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, 2017 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, 2017 for detailed information on this section.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

EPA ERRS contractor, CMC, completed backfilling at 260 Pecan Drive on August 21. Contents from the shed were removed on August 21 and repairs were made to the shed which was then relocated for the final time and refilled on August 23. Sod installation was also completed at 260 Pecan Drive on August 23.

Excavation at 224 Pecan Drive was completed on August 16 and a confirmation sample result from an excavation area of 6 inches exceeded the total PCB target cleanup goal of 1 ppm. Additional trees were removed from 224 Pecan Drive to remove soil at a greater depth and the area was reexcavated by August 22. Confirmation samples after the second excavation lift yielded total PCB results below the target cleanup goal.

Excavation at 228 Pecan Drive was completed on August 18. Backfilling began at 224 and 228 Pecan Drive on August 22 and was completed by August 24

On August 23 a tree at 244 Pecan Drive was cut down and removed. Removal activities at 244 Pecan Drive were completed during the month of July and the tree was noticeably dead by the first week of August. The tree was removed after the sod had sufficiently established to support work and equipment.

Clearing work began at 601 Robin Hood Drive on August 24; excavation work began on August 28. Access was obtained from the property owner of the adjacent undeveloped lot to utilize the empty space for access and equipment staging.

An area on the east edge of 248 Pecan Drive, approximately 12 feet wide between the rear fence and the drainage ditch was determined to be accessible from the lot at 601 Robin Hood Drive. Wooden "swamp mats" of 8 inch timbers were mobilized to construct a bridge across the ditch. Clearing was completed on August 28 and stumps were ground down to access the excavation area with equipment. An initial excavation of 12 inches was conducted, bordering up to the fence line and leaving a space of approximately 2 feet between the excavation zone and the cut bank of the ditch.

Confirmation samples were collected from 601 Robin Hood Drive and the additional excavation area on the east edge of 248 Pecan Drive on August 30.

ERRS temporarily demobilized from the Site on August 31 for a break during the Labor Day holiday weekend. Exposed tree roots in the excavation area at 601 Robin Hood Drive were covered with topsoil to preserve tree health.

A continuous silt fence is being installed on all properties where backfill installation has been completed, 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.

Cleanup criteria remains at 1,000 ug/kg. Soils with total PCB concentrations in excess of 50,000 ug/kg are no longer anticipated in remaining excavation activities. All confirmation samples are forwarded to EPA Region 4 Scientific Support Section for consultation prior to backfilling.

**2.1.2 Response Actions to Date**

- 224 Pecan - Excavation and backfilling complete.
- 228 Pecan - Excavation and backfilling complete.
- 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, backfilling, and sod 100% complete.
- 246 Pecan - Excavation, backfilling, and sod 100% complete.
- 248 Pecan - Excavation, backfilling, and sod 100% complete.
- 252 Pecan - Excavation, backfilling, and sod 100% complete.
- 254 Pecan - Excavation, backfilling, and sod 100% complete.
- 256 Pecan - Excavation, backfilling, and sod 100% complete.
- 260 Pecan - Excavation, backfilling, and sod 100% complete.
- 601 Robin Hood - Excavation 80% complete.
- 623 Robin Hood - Anticipated start date: 9/11/2017

**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		83.71 tons			Local Class II (C&D) Landfill
Non-TSCA Soil		4638.40 tons			Lee County Landfill, SC
TSCA PCB Soil		968.92 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**

The Town of Cheraw will be posting steel signage at Huckleberry Park which will read "Park Closed Until Further Notice" and will then remove the yellow tape which has been surrounding the park. The town administrator discussed this change with EPA OSC Huysler.

Clearing and excavation activities will begin at 623 Robin Hood Drive during the week of September 11. However, the threat of significant rain from Hurricane Irma may impede and delay work activities. Initiation of excavation will be postponed if impacts from Irma are anticipated.

**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
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$1,500,000.00	\$1,209,823.43	\$290,176.57	19.35%
TAT/START	\$75,000.00	\$60,000.00	\$15,000.00	20.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$1,575,000.00	\$1,269,823.43	\$305,176.57	19.38%

\* 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