

Georgia Department of Natural Resources

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Lonice C. Barrett, Commissioner

Environmental Protection Division

Harold F. Reheis, Director

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MEMORANDUM

TO: Harold Reheis

FROM: Jennifer Kaduck

DATE: June 13, 2001

SUBJECT: Monthly Report – May 2001
Hazardous Waste Management Branch

Program Development & Administration

1. A long-range planning meeting was held with the HWMB senior managers. The Branch's long-range goals were updated, and plans for accommodating Branch growth (15 new state and federal positions) were made and submitted to the Director for approval.
2. Two teleconferences were held on May 11 and May 25, 2001 to discuss a request made by the ASTSWMO Hazardous Waste (HW) Training Taskforce for assistance in the development of the 2002 training program on HW Recycling. The teleconference on the 25th included the HW Training Taskforce and was a forum for them to discuss the proposed format of the training and to articulate the sort of assistance that they required. A goal of the HW Recycling Taskforce has always been to see if some national consistency could be developed regarding policies on HW recycling while ensuring that the interests of each of the states on the Taskforce are suitably represented; memorializing this in a training seminar would readily accomplish this goal.
3. The National Conference of State Legislatures, in agreement with the USEPA, hosted a stakeholder meeting on May 5, 2001 to discuss USEPA's draft policies on cumulative risk assessment. The agenda included feedback from stakeholders involved in risk assessment at the state level. The cumulative risk assessment framework included the value of understanding the accumulation of risks from multiple environmental stressors (e.g., the anxiety associated with exposure to a contaminant released to the environment or living near a hazardous waste site). The focus included early community involvement in the risk assessment process, as well as moving beyond single chemical assessments and integrating the cumulative effects of multiple chemical stressors. The dialogue focused on technical and philosophical issues, such as the ability to quantify the varying stressors as well as the implementation of a cumulative risk assessment at the state and national level.

4. A member of the Branch attended the Colorado School of Mines course in “Applied Environmental Statistics.” The course concentrated on hands-on interpretation of environmental data. The methods described were applicable to evaluation of background determination of inorganics in a soil matrix, comparing a compliance point with a standard, and quality of background versus compliance wells, in conjunction with the assessment of delineation between multiple release sites. Topics included transformation of data sets to a lognormal scale and interpreting the results in terms of cleanup or delineation of a release, trend analysis, handling data below the detection limits, and dealing with outliers in an environmental data set.
5. The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) held a symposium on “Natural Resource Damages” in Denver, Colorado, May 21-22, 2001. A Branch representative attended. There were five plenary sessions: 1) “Natural Resource Restoration: Federal Regulations Overview”; 2) “Role of Eco-Risk”; 3) “Programmatic Overview of Habitat Equivalency Analysis”; 4) “Simplified Assessment Tools”; and 5) “Integration of Restoration and Remediation.”
6. A member of the Branch attended the USEPA Regional Risk Assessment Conference and Meeting, May 23 – 25. Since this was the first year that Georgia has been invited to attend this meeting, the Risk Assessment Unit members were very excited to have the opportunity to discuss risk assessment issues with risk assessors from other states, many USEPA regional risk assessors, and several prominent scientists from USEPA’s National Center for Environmental Assessment. Many important human health and ecological risk assessment issues were discussed at this meeting, including issues surrounding PCBs, dioxins, benzene, and vinyl chloride. Additionally, many presentations were given, including some regarding indoor air, cumulative risk assessment, and ecological sampling methods. The meeting ended with a productive discussion of ways for USEPA and state risk assessors to better communicate and coordinate with each other.
7. The Branch Chief attended the RCRA Policy Forum in Washington, D.C. and heard representatives of the new administration discuss hazardous waste priorities.
8. Approximately 6,000 generator certification and invoices were mailed to collect calendar year 2000 fees for hazardous waste, SARA Section 313, and solid waste.

Site Investigation and Cleanup Activities Under Authority of State Superfund Law

1. The **Atlanta Gas Light Company** (AGL) continued the removal project at the Waycross Manufactured Gas Plant (MGP) Site, HSI #10097. A total of over 27,000 tons of contaminated soil and debris have been removed from the site since hauling began on April 5, 2001. This brings the total amount of material removed from the MGP site, including the contaminated sediment removed from the Waycross Canal Site, to over 128,000 tons. EPD conducted inspections at the site on May 8 and May 31, 2001.

Excavation and backfilling has been completed in two off-site excavation areas. Excavations continued within the dewatered excavation area and within the Glenmore Avenue right-of-way during the month of May. Backfilling of the dewatered excavation area began in May after clean clay was exposed in the deepest portion of the pit. AGL was able to reach visually clean soils at the bottom of the pit within the influence of the dewatering system, and the deepest portions of the excavation were due to chasing small fingers of coal tar contamination down to about 15 feet. Excavation of shallow impacted soil will continue laterally outside the dewatering system, as the deeper portions are backfilled. A confirmation sample collected along the fence line adjacent to the CSX Transportation's Rice Yard exceeded the Type 4 Risk Reduction Standard for Arsenic, so AGL will have to seek access to CSX property to allow excavation to continue.

2. A corrective action plan for **Vogue Cleaners** in Martinez, HSI #10394, was approved by EPD. The plan describes a groundwater pilot study to evaluate the suitability of using a Hydrogen Release Compound to enhance the natural biodegradation of chlorinated solvents. Depending on the results of the pilot study, further corrective action may be necessary in order to bring the site into compliance with state cleanup standards.
3. The first phase of the corrective action plan for **Central of Georgia RR /Bernuth-Lembcke** site located in Savannah was conditionally approved. The first phase of the corrective action requires the installation of inception trenches to remove free phase creosote in groundwater, storage tank removal, and hot spot soil removal.
4. An informational meeting was held for the **Woodall Creek** site located in Atlanta. All seven of the identified responsible parties were invited to discuss the listing of the site on the HSI, what EPD goals for the site are, and what the scope of the investigation and remediation of the site should be.
5. Ten proposals were received in response to the Removal RFP issued to secure short-term removal contractors. The proposals will undergo a technical and financial review prior to awarding a contract to four contractors.

Hazardous Waste Trust Fund Lead Cleanups

1. A state contractor was assigned to collect fish tissue samples in the **Terry Creek/Dupree Creek** area in Brunswick and prepare the samples for toxaphene analysis. This project is being conducted in coordination with the Coastal Resources Division and watershed Planning Monitoring Program. The total project cost is \$50,000.
2. The Removal Work Plan submitted by Mactec for the removal of the sludge stockpile at **Han-Har Metal Finishing**, Ludowici, was approved. The cost of the project is \$153,901.64.

3. EPD approved the Removal Activities Report prepared for the **Moultrie Wood Preserving** site in Colquitt County documenting the removal of 192 tons of F034-contaminated soil from the site that was disposed of at the Horizon Landfill in Quebec. The final cost of the project was \$116,647.13
4. A removal Project Assignment Form in the amount of \$300,000 was issued to Earth Tech for the **Former Circle K Store #7703** site in Chatham County.

Private-Party Cleanups Under Authority of the State Superfund Law

1. Compliance status reports were received from responsible parties for the following sites which are already listed on the Hazardous Site Inventory. These reports present the results of investigations that are being conducted to determine the extent of soil and groundwater contamination and whether corrective action is needed.

<u>Name</u>	<u>City</u>	<u>Site #</u>
PPG Industries	Perry	10085
Forstmann & Company	Tifton	10473
Coastal Cleaners	Saint Simons	10487
Circle K Store #5259	Marietta	10513
Albany Warehouse Co.	Albany	10577

2. A corrective action plan was received from responsible parties for the following site to show how the responsible parties plan to bring the site into compliance with the risk reduction standards.

<u>Name</u>	<u>City</u>	<u>Site #</u>
PPG Industries	Perry	10085

3. Notices of deficiency were sent to responsible parties for the following sites after review of compliance status reports and corrective action plans submitted by the parties to present the results of investigations that have been conducted to determine the extent of soil and groundwater contamination and to describe the corrective action needed to bring the sites into compliance with the risk reduction standards. The notices of deficiency inform the responsible parties of actions that are needed to complete their investigations and their corrective action plan.

<u>Name</u>	<u>City</u>	<u>Site #</u>
Georgia Power Plant Branch	Milledgeville	10051
Georgia Ports Authority	Bainbridge	10071

139 Brampton Road	Garden City	10208
Oil Processing Corp.	Wrens	10245
Old Sterling Landfill	Brunswick	10307
Ruby Quarry Asphalt Plant	Gray	10494

Hazardous Site Inventory Removals

1. The **Production Anodizing Corp Landfill Site** in Adel, HSI #10311 was originally listed on the HSI due to a known release of bis (2-ethylhexyl) phthalate to groundwater and a drinking water well within 0.5 mile. The groundwater data was taken from a USEPA 1993 Site Investigation Report. EPD performed an Expanded Site Investigation in October 2000 that included collecting groundwater samples. The groundwater sample results showed no release of bis(2-ethylhexyl)phthalate to groundwater. The site was re-evaluated using this data and removed from the HSI.

Compliance Monitoring and Enforcement (see attached chart)

1. Administrative Orders were issued to responsible parties for the following sites to establish a schedule for investigating their sites and performing corrective action to bring the sites into compliance with the risk reduction standards.

<u>Name</u>	<u>City</u>	<u>Site #</u>
Former Rally Restaurant & Briarcliff Station	Atlanta	10410
Ruby Quarry Asphalt Plant	Gray	10494

2. A Consent Order was issued to responsible parties for **Encore Properties, Inc.** (f.k.a. **Eltra Prestolite**) in East Point to establish a schedule for investigating this site and performing corrective action to bring the site into compliance with risk reduction standards.
3. Consent Orders were also issued to the following:

<u>Name</u>	<u>City</u>
Donnie Clack – 764 Hairston Rd.	Stone Mountain
PPG Architectural Coatings, Inc.	East Point
Samples Transportation	College Park

4. An amendment to Consent Order No. EPD-HW-1107 was issued to **The DOW Chemical Company** in order to delete certain monitoring well designations from the list of

groundwater monitoring wells to be maintained at the site, located in Dalton. This Order was originally executed on August 24, 1994.

5. **AMK, Inc. and Mr. William Andrews**, Atlanta – Late in 1996, the Division investigated allegations of improper management of contaminated soil removed from an old concrete sand pit used for the draining of drums at the **City of Atlanta's** Claire Drive vehicle maintenance facility. The City awarded the contract for removal of the pit to Mr. William Andrews, the former Atlanta Falcons football player. Sampling of a portion of the 6,500 tons of soil sent to a soil recycling facility in Atlanta, **Goodearth Recycling Corporation**, revealed that the soil contained hazardous waste. The City of Atlanta and Goodearth Recycling Corporation each paid a \$10,000 settlement as part of Consent Orders to settle the violations. Several attempts to enter into a negotiated settlement with Mr. Andrews failed. On March 31, 2000, Administrative Law Judge Baird imposed EPD's requested penalty of \$26,000 on AMK, Inc. and Mr. William Andrews. On May 8, 2000, Judge Baird's decision was made an order of Fulton County Superior Court. On May 15, 2000, the Law Department issued a demand letter to AMK, Inc. for the \$26,000 judgment. Having not responded, the Law Department hired a collection firm. The collection firm was able to locate and freeze a bank account of Mr. Andrews containing \$50,000. On May 29, 2001, the collection firm received the \$26,000 garnishment from the bank and is forwarding EPD its share, about \$17,000.
6. A meeting was held on May 31, 2001 with **Kerr-McGee**, Savannah, to discuss the compliance status of the facility. USEPA and EPD inspected the plant in 2000 and identified numerous hazardous waste violations, including improper land disposal and treatment of hazardous waste. The facility had requested this meeting prior to the initiation of any formal enforcement action by EPD regarding these violations. The Coastal District was factored into the review process for the draft of the formal enforcement action to ensure that any actions that may be required by the Hazardous Waste enforcement do not conflict with the wastewater hard-piping project being conducted by Kerr-McGee to comply with the Coastal District's Water Quality Order.
7. **Xerox Corporation** has historically demonstrated financial assurance for their facility (located on Fulton Industrial Blvd. in Atlanta) through the corporate test. However, Xerox is currently being investigated by the Securities and Exchange Commission (SEC) for "accounting irregularities" (Wall Street Journal, 05/22/01). Because of the SEC probe, Xerox's accountants (KPMG LLP) have declined to certify the financial results forming the basis of Xerox's annual report, which certification is an essential part of the financial test. The rules require alternate financial assurance within 30 days of a failure to meet the financial test, which must be demonstrated annually within 90 days of the end of the company's fiscal year. Xerox notified EPD on April 20 that they would not be able to demonstrate the financial test, requiring alternate financial assurance by May 1. A series of telephone calls was initiated with Xerox in an attempt to expedite the implementation of an alternate financial assurance mechanism. Xerox obtained a letter of credit and

established a standby trust fund by May 23; this rapid turnaround likely would not have been possible with a formal exchange of correspondence, which usually takes over 30 days.

Corrective Action Required Under RCRA

1. **Southwire Company**, Carrollton – EPD has received a treatability variance from the Land Disposal Restrictions from the Southwire Company. The variance has been reviewed and found complete. EPD will public notice the variance and receive comments before making a final decision to grant or deny the variance request.
2. **Phibro-Tech**, Powder Springs – A meeting was held on May 22, 2001 at the request of Phibro-Tech to present the corrective action proposed for groundwater remediation at the Powder Springs facility. The presentation started with the Fe(0) filtration process developed by Stevens Institute to remediate arsenic groundwater contamination in Bangladesh. Stevens Institute has also developed an activation device (patent pending) that prevents the Fe(0) particles from fusing, thereby keeping the surface of the particles active. Groundwater will be pumped to the treatment system, treated to remove metals, and then discharged to the Cobb County Publicly Owned Treatment Works (POTW). The on-site pilot study is to be operational in July 2001, and the full-scale treatment system is to be operational in September 2001. Phibro-Tech says that this is an economical method that will produce less sludge than other similar methods. This may be the first ex-situ iron filtration remediation in Georgia.
3. **GE-Rome** – The permit modification for the groundwater corrective action has been reviewed, and final modifications are being made in preparation for a public notice and comment period. GE requested and received approval to do an immediate soil removal at the West Central Elementary School. This immediate action is necessary to ensure that the soil removal and construction activities can be completed while the school is on summer vacation. GE has also submitted final plans to conduct the interim action approved off-site at the Lowe's property and the Muller's property in accordance with the plan as approved by EPD.

Several residential properties in the Rome area that are suspected to have used PCB contaminated oil from the GE plant were investigated by GE; however, GE has declined to sample some properties. EPD has developed criteria to evaluate properties that GE will not pursue. This plan will be finalized in June and an implementation strategy developed.

GE has made a limited offer to conduct blood sampling to residents with elevated levels of PCB discovered on their properties. EPD has extended an offer to pay for blood testing to residents with PCB concentrations on their property in excess of 500 ppm. A broader and more inclusive blood testing program is being considered by other federal agencies

but has not been finalized.

4. **MCLB Albany** – The Technical Memorandum for preliminary investigation of the Depot Maintenance Area (DMA) for Operable Unit 6, Marine Corps Logistics Base (MCLB) Albany was reviewed and comments provided to the Navy. This document provides the framework for studying source control measures at the DMA, the core operation at MCLB Albany. There is much evidence of historical releases from this site, particularly of chlorinated solvents, and is the most technically difficult area of the base to be addressed.

MCLB Albany (Part 2) – A Work Plan Addendum for investigation of pavement and drains at the Depot Maintenance Area for Operable Unit 6, Marine Corps Logistics Base Albany was reviewed and comments provided to the Navy. The Navy has proposed that they be allowed to utilize the 45-acre concrete apron and floor of this area as a cap to prevent transport of hazardous constituents by preventing infiltration of precipitation. This document begins to address the enormity of that project; the paved area covers thousands of feet of sewerage and includes miles of expansion joints.

5. **Naval Submarine Base**, Kings Bay – A member of the Government Facilities Unit completed the third Environmental Indicator (EI) Evaluation for the U.S. Naval Submarine Base at King's Bay, Georgia (SUBASE) for CA725 (Human Exposures Controlled), and CA750 (Migration of Groundwater Contamination Controlled). There is a human exposure pathway for off-base residents, through use of contaminated private irrigation wells, to groundwater contaminated with chlorinated volatile organic compounds (cVOCs) emanating from an old landfill just inside the base boundary. SUBASE is expected to provide irrigation water to the off-base residents to eliminate this pathway by 2003, enabling a CA 725 "YE" (Human Exposures Controlled). SUBASE has successfully used *in situ* chemical oxidation (CHEMOX) with Fenton's Reagent to reduce source area groundwater cVOC concentrations nearly to the levels necessary (≤ 100 ug/L cVOCs) to implement Monitored Natural Attenuation according to the Corrective Action Plan. There is a high level of confidence that a CA750 "YE" (Migration of Contaminated Groundwater Controlled) determination can be made by 2003.
6. **Robins AFB**, Warner Robins – Land Use Control Memorandum of Agreement for Operable Unit Nos. 1 & 3 was finalized. This agreement sets out the frame work for implementing and maintaining the land use control measures dictated in the Record of Decision.

Permitting

1. **Monsanto**, Augusta – A meeting was held to discuss direction in permitting with the Maximum Achievable Control Technology Rule (MACT) and the pending risk assessment. A revised application is due in June 2001. The company has requested permission to split the facility into three entities due to the recent sale of Nutrasweet.

Risk Assessment Issues

1. **LCP NPL Site**, Brunswick – A teleconference was held May 9, 2001 regarding the Baseline Ecological Risk Assessment (BERA) for the Uplands/Marsh operable unit at the site. Due to the extensive removal action conducted between 1994 and 1998, further remedial actions for the uplands soils and the marsh/estuary will be driven by ecological risk factors. Consequently, there have been significant discussions among EPD, USEPA, the Responsible Parties, and other ecological trustees in an attempt to come to an agreement on the various studies that will be used to finalize the BERA for this area.
2. **Southwire Sites** – A meeting between Southwire, the South Carolina Department of Health and Environmental Control, Georgia EPD, and USEPA, Region IV was conducted to discuss the determination of site-wide dioxin background levels for the Southwire sites located in Georgia and South Carolina, the application of analytical screening methods for dioxin in delineation of a dioxin release, fingerprinting methods for weathered dioxins/furans, anaerobic bacterial degradation, and photodegradation of dioxin in the environment.
3. **GE-Rome Site** – On May 25, 2001, an inter-agency meeting regarding the GE-Rome site was held at EPD's office in Atlanta. The purpose of this meeting was to discuss efforts to address community health concerns in Rome and to address coordination between involved agencies. Representatives of ATSDR, USEPA, EPD, and the Department of Human Resources were present, as well as Dr. Howard Frumkin of Emory University. It was agreed that all the agencies would cooperate as much as possible in the human health assessments associated with the site including a blood study that is being planned by Dr. Frumkin.
4. Risk assessment reviews were completed for the following facilities:

Parkwood Village Shopping Center	-	Riverdale
York Casket	-	Lawrenceville
Chemical Products Corp.	-	Cartersville
Fort Stewart	-	Ft. Stewart
Vulcan	-	Smyrna
LCP Chemicals	-	Brunswick
GE-Rome	-	Rome

Community/Industry Outreach

1. A meeting was held with representatives of the Georgia Industry Environment Coalition (GIEC), the Georgia Mining Association, the Georgia Chamber of Commerce, and the Georgia Chemistry Council to discuss regulatory issues concerning the recycling of hazardous wastewater.

2. A meeting was held on May 30, 2001 with the City of Lawrenceville, the U.S. Geological Survey, **York Casket Hardware**, and representatives of several EPD Branches - Hazardous Waste, Water Protection, and Geologic Survey, to discuss the City's plan to develop additional sources of groundwater for municipal supply. The city has drilled several high-yielding exploration wells, and is interested in permitting the wells and bringing them on line. Several issues complicate this effort. The Hazardous Waste Branch's concern is that one of the municipal wells (currently not in use) is located adjacent to York, a RCRA facility that is undergoing groundwater cleanup for volatile organic contamination (VOC). Pumping tests show that, although it has not become contaminated, the municipal well is hydraulically connected to wells on the York property. At the request of EPD, Lawrenceville has delayed the startup of the municipal well in order to avoid spreading groundwater contamination. York's groundwater plume has been responding favorably to the pump-and-treat remedy, and it is anticipated that within a few years the VOC plume will be eliminated.
3. A member of the Branch provided testimony and technical information to an external review committee investigating tritium contamination of groundwater in Burke County, Georgia. In 1991, high levels of tritium were discovered in a public water supply well in Burke County, directly across the Savannah River from the U.S. Department of Energy's (DOE) Savannah River Site. EPD was asked to participate in investigating whether there was a threat to public health. Studies by the U.S. Geological Survey (USGS), and part of the work by EPD, were funded by DOE. Studies by the EPD and the USGS showed that: 1) Construction records of the contaminated public water supply well indicated that the well was drawing water from a confined aquifer at a depth of 200 to 300 feet; however, the study showed that the well had been damaged by lightning and was actually drawing water from the surficial aquifer; 2) the surficial aquifer in eastern Burke County was contaminated over an area of approximately 100 square miles, although the levels of contamination were uniformly below the safe drinking water standard; 3) a major fault system, underlying the Savannah River Plant, extends into Burke County; 4) computer modeling demonstrated that groundwater from the Savannah River Plant could move under the Savannah River into Georgia. In 1998, after initial reports by EPD and the USGS, DOE cancelled any further investigation of the problem. The external review committee was charged with the task of reviewing the necessity for long-term monitoring and additional studies.
4. A Branch Associate participated in Stone Mountain High School's Career Day on May 3, 2001. The associate spoke with high school students from grades 10-12 about Environmental Careers with the Georgia Environmental Protection Division.
5. The Generator Compliance Program conducted eleven Compliance Assistance Visits under the initiative for outreach to the dry cleaning sector. Owners have been very receptive to our assistance. The Branch obtained information from the Air Protection Branch on new dry cleaning businesses in order to mail them the Branch's publication entitled Environmental Guide for Georgia Dry Cleaners.
6. The Branch is continuing to investigate calls received from Rome citizens on the toll-free number regarding the use of PCB waste oil for termite control and PCB contaminated sewage sludge as fertilizer. The Branch is investigating approximately 150 locations and

approximately four contaminated residences have been found. Cleanup has been completed by GE at two of these residences. This investigation is expected to continue the rest of the year. EPD is working with the local health district, USEPA, and ATSDR to address health concerns of residents with contaminated properties.

JRK/dm
Attachment
cc: David Word
Branch Chiefs
HWMB Program Managers

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