

SITE: Circle Env #1
BREAK: 2.9
OTHER:

**U.S. ENVIRONMENTAL PROTECTION AGENCY
\$250,000 EMERGENCY ACTION MEMORANDUM**

Date: September 21, 2007
Subject: Circle Environmental #1 Site
Dawson, Terrell County, Georgia
From: James W. Webster, FOOSC
U.S. Environmental Protection Agency, Region 4
To: Site File

I. PURPOSE

The purpose of this document is to document the decision to initiate an emergency removal action for stabilization of conditions at the Circle Environmental #1 Site under the FOOSC's \$250,000 authority and updates the Action Memorandum dated September 14, 2007.

II. BACKGROUND

Site No: A4RC
Task Order Amount:
Response Authority: CERCLA
State Notification: 09/10/2007

Task Order No: TBD
Contractor: WRS
NPL Status: No
Start Date: 09/11/2007

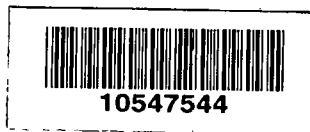
III. SITE INFORMATION

A. Incident Category

The Site is an inactive waste management facility.

B. Site Location and Description

The Circle Environmental #1 Site is located at 170 5th Street in downtown Dawson, Terrell County, Georgia. The facility consists of a brick/wood-construction warehouse measuring approximately 120 by 60 feet in size. The geo-coordinates of the Site are 31.77295 N Latitude and 084.44770 W Longitude.



C. Removal site evaluation

USEPA received a request from the Georgia Environmental Protection Division to take action at the Site, on September 10, 2007. Reports from the State indicate that Circle Environmental is an inactive waste management facility that cleaned oil and solvent tainted wipe rags. The FOSC responded to the facility on September 10, 2007, met with local officials, and noted the following either through direct observation or through city and county officials:

- Approximately 300+ drums of suspected wastes stored within the subject warehouse.
- Many of the drums carried labels indicating waste oil and oil sorbents, flammable materials, and tetrachloroethylene (PCE) wastes.
- Total airborne volatile organic compound (VOC) readings at the warehouse doorway were on the order of 8 to 10 parts-per-million (MultiRae).
- The warehouse is located within the downtown business district of Dawson, immediately adjacent to the City Hall and actually abutted a number of active businesses.
- Residential buildings are located within three city blocks of the warehouse.
- Local officials indicated that heavy solvent odors emanating from the warehouse was one of the factors that had brought the site to local and state attention.

D. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The primary chemicals of concern, based upon container labels and from information gained from local and state officials and the former operator of the Site are believed to be waste oil, and tetrachloroethylene. Tetrachloroethylene is a CERCLA hazardous substance.

1. Description of threat relative to 40 CFR §300.415(b)(2) criteria**a. 300.415(b)(2)(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.**

The Site is located within the downtown business district of Dawson, Georgia and within close proximity to residential areas immediately adjacent to the downtown area. Hazardous substances are believed to be stored at the Site, which are believed to be abandoned as the operator is reported to have been evicted from the property. Intentional dumping of materials from the drums or a fire at the warehouse through vandalism, natural causes, or other means may expose nearby populations to hazardous substances.

b.. **300.415(b)(2)(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems.**

Potential contamination of drinking water supplies or sensitive ecosystems is not thought to be a significant factor at this specific Site.

c. **300.415(b)(2)(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release**

In excess of 300 55-gallon drums of suspected hazardous substances are within the warehouse. The condition of many of the drums is unknown. Air monitoring suggests that airborne releases of hazardous substances were occurring at the time of the removal site evaluation. Vandalism, natural causes, or other factors could result in catastrophic release of hazardous substances from the Site.

d. **300.415(b)(2)(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate**

Soils contamination is not thought to be significant factor that this specific Site.

e. **300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released**

Weather conditions are not thought to be a major concern at this specific Site. However, a lightning strike might lead to a fire at the facility, which, in turn, could lead to release or threatened release of hazardous substances from the Site.

g. **300.415(b)(2)(vii) The availability of other appropriate federal or state response mechanisms to respond to the release**

The State of Georgia has the regulatory and response authority to take action at the Site. Georgia Environmental Protection Division referred the Site to EPA citing lack of resources to perform a state-funded cleanup.

h. **300.415(b)(2)(viii) Other situations or factors that may pose threats to public health or welfare of the United States or the environment.**

As there is no security at the CE#1, break-in and/or vandalism will be a continuing potential cause of release of hazardous substances as long as the drummed waste remains at the Site.

IV. RESPONSE INFORMATION

A. Removal activities to date

The EPA mobilized to the Site on September 10, 2007. START and ERRS contractors were mobilized the same day and arrived on site on September 11, 2007. The current and planned response actions initiated by the Federal include the following:

- Air monitoring inside and in the immediate vicinity of the Site.
- Inventory of the contents of the warehouse and documentation written and photographic documentation of all drums and drum markings.
- Preliminary segregation and staging of drums for waste-stream characterization and disposal profiling.
- Inspection of the contents of all drums and hazard characterization and sampling, as appropriate.
- Further segregation and staging of drums according to waste-stream.
- Off-site, treatment, recycling, or disposal of wastes, as appropriate, relative to its waste profile.

B. Enforcement

See the Enforcement Addendum (Enforcement Sensitive Document) for information relative to enforcement activities.

C. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

D. Description of Alternative Technologies

Alternative technologies will be employed to the extent practicable considering the time-sensitive nature of this removal action. Technologies being considered include recycling, fuels blending, incineration, and reuse.

E. ARARs

CERCLA on-site removal actions only need to comply with ARARs to the extent practicable, given the exigencies of the situation. The potential Federal ARARs identified for the Site include portions of the Resource Conservation and Recovery Act (RCRA), the Department of Transportation (DOT), and the Occupational Safety and Health Administration (OSHA). The CERCLA off-site rule will also be adhered to for waste-streams containing hazardous substances and/or hazardous wastes. The State will be requested to provide ARARs prior to the disposal phase for waste-streams containing hazardous substances and/or hazardous wastes.

F. Project schedule

The removal action is anticipated to be completed within 90 days of the Start Date.

V. COSTS

Extramural Costs	Ceiling	Cost to Date
ERRS	175,000	
START	40,000	
Total Extramural Costs	215,000	
Intramural Costs		
Region, HQ, ERT	15,000	
Total Intramural Costs	15,000	
Contingency	20,000	
TOTAL PROJECT CEILING	250,000	

The Project Ceiling has been approved by the OSC as documented in this Action Memorandum. 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. 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.

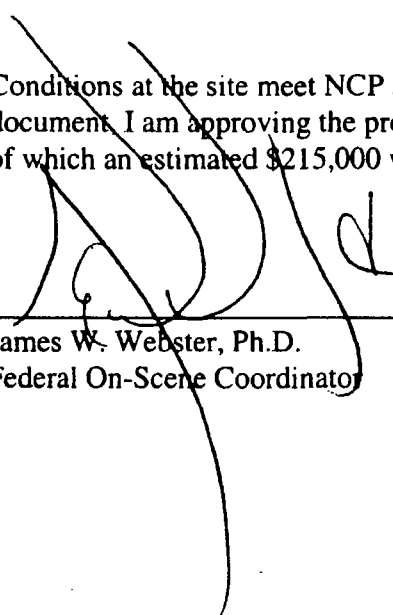
VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Inaction or a delay in action at this Site would increase the actual or potential threats to the public and the environment. The worst-case scenario would like be a fire resulting from vandalism, or natural or other causes. Such an incident would likely result in release of hazardous substances and pollutants or contaminants to the air and would in all likelihood necessitate evacuation of downtown Dawson and nearby areas.

IX. APPROVAL

This decision document represents the selected removal action for the Circle Environmental #1 Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet NCP section 300.415(b)(2) criteria for a removal and through this document, I am approving the proposed removal actions. The total project ceiling is \$250,000, of which an estimated \$215,000 will be funded from the Regional removal allowance.



James W. Webster, Ph.D.
Federal On-Scene Coordinator

Date

Sept 21, 2007