

437SERBSF10,627

437SERBSF10,627

Site Name (Subject): SUPREME FINISHING

Site ID (Document ID): NCD986188878

Document Name (DocType): Removal (RMVL)

Report Segment:

Description: Immediate Removal Correspondence, 1992 - 1993

Date of Document: 1/28/1993

Date Received:

Box: *Enter SF and # with no spaces* SF10,627

Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

Document Category: FACILITY

**Print Report for
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record values)**

Delete Record



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

FEB 01 1993

SUPERFUND SECTION

JAN 28 1993

Ms. Pat De Rosa
Superfund Section
P.O. Box 27687
Raleigh, NC 27611-7687

RE: Request for Site Information

Dear Ms. De Rosa:

The following documents are being sent to you, per Bill Steiner's request.

Should you have any questions or need any further assistance or information, please contact me, Tracy Palmer, at (404) 347-3931.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Tracy Palmer", written over a circular scribble.

Tracy Palmer
Emergency Response

RECEIVED

FEB 1 1993

SUPERFUND SECTION

SUPREME FINISHING
3033 Ross Avenue
Durham, NC

Ref No. 05671
EPA Id NCD986188878

Removal Action: Michael Taylor, OSC
Started: 08/18/92
Completed: -----



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
FEB 1 1993
SUPERFUND SECTION

YELLOW

ACTION-MEMORANDUM

DATE: *AUG 06 1992*

SUBJECT: Removal Authorization for the Supreme Finishing Site
Durham, Durham County, North Carolina

FROM: Michael Taylor, On-Scene Coordinator
Emergency Response and Removal Branch

TO: Joseph R. Franzmathes, Director
Waste Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Supreme Finishing Site, Durham, Durham County, North Carolina, hereafter referred to as the "Site".

II. SITE CONDITIONS AND BACKGROUND

The Site is an abandoned plating and painting facility located in a predominantly residential neighborhood adjacent a vacant house. The facility contains various drums, vats, and containers all of which contain hazardous substances as defined in Section 101 (14) of CERCLA, as amended, 42 U.S.C. § 9601 (14). There are minimal site controls in place. The windows and doors have been secured with "NO TRESPASSING" signs mounted around the perimeter. The Site was referred to the Emergency Response and Removal Branch (ERRB) by the Waste Management Branch for North Carolina Department of Natural Resources (NCDNR).

A. Site Description

1. Removal Site Evaluation - On May 15, 1991, EPA Emergency Response and Removal Branch (ERRB) responded to a report from the Hazardous Waste Section for NCDNR, that an abandoned plating facility had a release of hydrogen cyanide gas and contained approximately 40 drums of cyanides, acids and salt wastes. EPA was informed that "conditions immediately dangerous to life

*)/osc
Taylor
w/for
7-30-92*

*4WD/Chief RMS
Stainer
JCS
7-30*

*4WD/Chief/ERRB
LAR
JCS
for
7-31*

*4WD/Assoc. Director WMD
Superfund
Green
[Signature]
8/3/92*

and health (IDLH) existed at the Site". The State hired Four Seasons Industrial Services to overpack and remove nine hazardous waste containers which were sent to Laidlaw Environmental Services in Reidsville, North Carolina. The State claimed their funds were exhausted and could not continue to pursue Site activities. However, hazardous substances on-site continue to present an imminent and substantial endangerment to the public and the environment.

Upon arrival the responding On-Scene Coordinator (OSC), accompanied by the Technical Assistance Team (TAT), found an abandoned block frame building with a small metal storage shed directly behind the main structure. The building is in the middle of an established residential neighborhood. Directly adjacent the Site exists a wooded lot with a drainage ditch to carry runoff from the Site into a pond nearby. TAT conducted perimeter and interior air monitoring. The Hazardous Waste Branch from the State of North Carolina removed the cyanide drums prior to EPA arrival. Air monitoring revealed IDLH conditions no longer existed.

A preliminary assessment was conducted by EPA and discovered the presence of various quantities of hazardous and unknown chemicals. The facility consists of five specific work areas that contain 12 open vats, approximately 400 containers of paint and solvents as well as several small quantity containers labelled "flammable". In addition 85 drums with volumes of 30 and 55 gallons are stored throughout the building. Several drums contain flammable and corrosive substances. Numerous drums show signs of pressure and bulging around the lids. The facility includes a dry-kiln, spray booths for painting with a small metal shed located on the back section for storage of approximately 150 containers. The shed storage contains corrosive and flammable containers packed to capacity that are deteriorating and leaking. The main facility and shed are minimally secure.

There is documentation of soil contamination around the perimeter of the facility. Soil sampling and analysis detected elevated metal levels around a drainage area behind the building. This area is suspected to have been caused by a drainage pipe installed by the original owner/operator in 1966.

2. Physical Location - The Site is located at 3033 Ross Road in Durham, North Carolina. This facility is found eight miles southeast of downtown Durham and 12 miles north of Raleigh. Residential single-family homes are directly adjacent the Site. Approximately 20 residential homes with a substantial number of children are located within a one block area. Highway 98 is less than a mile from the Site. The CSX railroad track is three blocks due west in a light industrial setting. Two churches are located less than a mile northwest of the Site. Ross Road is a local schoolbus route for the area.

3. Site Characteristics - Durham county officials condemned the building prior to State and ERRB involvement. The Site consists of an abandoned plating facility that currently stores drums, vats and various containers of plating wastes. The Site poses a potential fire and explosion threat that would affect approximately three to five thousand people within a mile radius. A portion of the property has been placed for sale with a local realtor.

There have been claims that open dumping and releases into the environment took place around the perimeter of the facility during operations from a former owner and operator. Evidence indicates there are elevated metal levels within the soil adjacent the facility. A drainage ditch flows along one side of the facility into a local pond where livestock obtain water. Overflow from the pond flows into an adjacent drainage ditch away from the Site.

4. Release or threatened release into the environment of a hazardous substance or pollutant or contaminant - The following substances were found as a result of sampling containers and soil on-site. These samples were collected on November 19, 1991.

<u>Hazardous Substance</u>	<u>Concentration</u>	<u>Location</u>
Toluene	520,000 mg/l	Sample #1
Xylene	24000 mg/l	Drum
Ethyl Benzene	4800 mg/l	
Flashpoint F	< 140	
Barium (total)	140 mg/l	Sample #2
Chromium (total)	3700 mg/l	Vat
pH	1.34	
Cyanide	10 mg/kg	Sample #3
pH	9.92	Vat

<u>Hazardous Substance</u>	<u>Concentration</u>	<u>Location</u>
Cyanide	8.3 mg/kg	Sample #6
pH	14	Drum Shed
Cadmium	42,000 mg/l	Sample #7
Chromium	420 mg/l	Vat
Lead	140 mg/l	
pH	< 2.0	
Barium	440 mg/kg	Sample #8
Chromium	1500 mg/kg	Soil NW
Lead	130 mg/kg	Bldg.
Barium	130 mg/kg	Sample #9
Chromium	250 mg/kg	Soil NW
Cyanide	7.2 mg/kg	Corner

5. NPL Status - The Site is not listed on the NPL.

B. Other Actions to Date

1. Previous Actions - ERRB responded to a call from NCDNR on May 15, 1991 concerning a cyanide gas release and drums of cyanides, acids, and bases inside a facility within a residential neighborhood. The State of North Carolina was on-site and conducted a small removal of nine cyanide drums. EPA responded and performed a preliminary site investigation. The State of North Carolina continued to control the Site and attempted enforcement actions. The State notified the owner of the property with a "NOTICE OF VIOLATION" along with a "COMPLIANCE SCHEDULE" on May 31, 1991. A deadline for remediation by the owner was set for September 1, 1991. The deadline passed with no response from the owner.

In November of 1991 EPA ERRB conducted a site assessment and sampling analysis to determine all contaminants on-site. ERRB, accompanied by the State, obtained 11 samples from containers and soil at the Site.

The State continued control of the Site and enforcement actions through March of 1992. The Site was vandalized in April of 1992 allowing the threat of human contact as well as a fire and explosion threat. EPA secured the Site from local exposure and the immediate threat to the public. "Hazardous" indicators were placed

on-site to warn potential trespassers and vandals. The local law enforcement was notified and requested to patrol the Site.

Information Request letters and Notice of Liability were submitted to all Potentially Responsible Parties (PRP) in May of 1992.

2. Current Actions - Currently the Site is being monitored by EPA. Information requests from the PRPs are being reviewed by EPA. EPA's Office of Regional Counsel (ORC) is obtaining access to the property.

C. State and Local Authorities' Role

1. State and Local Actions to Date - The State of North Carolina controlled the Site from initial response in May of 1991 until March of 1992. No legal action has been undertaken by the State or local authorities.

2. Potential for Continued State/Local Response - It is unlikely that any State or other political subdivision will undertake any response activity on this Site in the future due to the lack of available funding.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The Site contains various substances and containers posing a direct human contact threat as well as a fire and explosion threat to the public and environment.

The Agency for Toxic Substances and Disease Registry (ATSDR) has been consulted concerning local health risks from the Site. In consideration of the fire and explosion threat from hazardous substances and wastes on-site, as well as its proximity to the local population, ATSDR views the Site as a health threat to the neighborhood and recommends a removal action.

The facility contains open vats of acids, strong oxidizers and wastes. The vats are badly deteriorated with indications of seepage from piping. In addition, there is documentation of open drums and containers which have released their contents onto the facility floor. There have been pH readings taken from the facility floor that reveals a pH level of less than 2 units.

Flammable and/or corrosive labels are found on 50 percent of the containers in the main facility and storage shed.

An air release from a fire and/or explosion from the Site would cause harmful vapors and gases to immediately affect the nearby population.

There are residents located within 100 feet of the Site. This facility operated in the middle of a predominately residential neighborhood. Duke University Hospital is located within four miles and the Raleigh-Durham Airport is located within eight miles of the Site. A public school is located within one mile, as well as three churches and a small shopping area is in the vicinity. Approximately three to five thousand people would be affected within a mile radius if a fire and/or explosion were to occur.

The Site was subjected to vandalism in April of 1992. This presents a continued health threat to the public as long as there are hazardous substances and waste on-site. There have been threats of burning the Site on numerous occasions by anonymous telephone calls and letters. In addition, there are claims that drums may have been buried behind the facility.

B. Threats to the Environment

The potential for a fire and/or explosion at this Site presents a definite environmental threat through air releases of poisonous gases and vapors. In addition, a release of the hazardous substances would contaminate the surrounding soil as well as surface and groundwater.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal of hazardous substances and off-site RCRA disposal is the only feasible solution for mitigating threats posed by the situation. Site stabilization without disposal would provide only a temporary solution for the Site.

A. Proposed Actions

1. Proposed Action Description - The following actions are proposed for this Site:

- (a) Contain hazardous liquids from the vats.
- (b) Overpack all leaking containers (drums, cans, canisters).
- (c) Segregate and stage all containers on-site.
- (d) Conduct compatibility tests and develop appropriate waste groups for disposal.
- (e) Conduct and obtain soil samples to determine extent of soil contamination around the Site.
- (f) Perform core sampling of the facility to determine soil contamination.
- (g) Determine if there are buried drums on the property.
- (h) Excavate contaminated soil and perform confirmation sampling.
- (i) Arrange for disposal of all hazardous waste to a permitted waste facility.

Confirmation of soil contamination beneath the facility floor may be required. There exists the strong possibility of contamination beneath the concrete and gravel flooring since the facility started operations in 1966. Future sampling and analysis may warrant demolition of the facility. The extent of contamination may increase the ceiling costs for the Site in the future.

2. Contribution to Remedial Performance - This removal action will abate the immediate threats identified in the preceding sections of this Action Memorandum. No further actions are foreseen after removal is complete.

3. Description of Alternative Technologies - Alternative technologies will be considered once the extent of Site contaminants and waste are known.

4. Applicable or Relevant and Appropriate Requirements (ARARs) - The Federal ARARs determined to be appropriate for the Site are the Resource Conservation Recovery Act (RCRA), and the Toxic Substance Control Act (TSCA). Off-site disposal will be conducted in accordance with EPA's Off-Site Disposal Policy as referenced in 53 FR 48218-48234 dated November 29, 1988.

5. Project Schedule - Response action at this Site will be initiated upon approval of this Action Memorandum. Foregoing any unexpected delays, all actions are expected to be completed within six months.

B. Estimated Costs

Extramural Costs:

Regional Allowance Costs:(ERCS)	\$347,350
(15% contingency)	<u>52,103</u>
Subtotal	399,453

Other Extramural Costs Not Funded From the Regional Allowance
 Total TAT, including multiplier costs \$ 36,500

Subtotal, Extramural Costs	\$435,953
Extramural Costs Contingency (20%)	<u>87,190</u>
TOTAL, EXTRAMURAL COSTS	\$523,143

Intramural Costs:

Direct (400 hrs at \$30/hr)	\$ 12,000
Indirect (400 hrs at \$54/hr)	<u>\$ 21,600</u>

TOTAL, INTRAMURAL COSTS	\$ 33,600
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TOTAL, REMOVAL PROJECT CEILING	\$556,743
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action is delayed there is an increased risk of a release to the environment, and an increased risk of fire/explosion, posing a danger to the public health and welfare.

VII. OUTSTANDING POLICY ISSUES

An issue at hand pertains to the State of North Carolina and its off-site disposal situation. The State of North Carolina failed to site its incinerator within the State, which was a requirement of the Southeastern Waste Compact. In reaction to this, some states have attempted to restrict shipment of RCRA and CERCLA wastes from North Carolina. EPA will be considerate of this issue during cleanup and disposal activities.

VIII. ENFORCEMENT

"Enforcement Sensitive"

IX. RECOMMENDATION

This decision document represents the selected removal action for the Supreme Finishing Site, in Durham, Durham County, North Carolina, developed in accordance with CERCLA as amended and not inconsistent with the NCP. This decision is based on the administrative record for the Site. Conditions at the Site meet the NCP section 300.415 (b)(2) criteria for a removal and I recommend your approval of the proposed removal actions. The total project ceiling, if approved, will be \$556,743. Of this, an estimated \$347,350 comes from the Regional removal allowance.

Approval: _____ Date: _____

Disapproval: _____ Date: _____

"Enforcement Sensitive"

The State of North Carolina Hazardous Waste Section notified EPA ERRB in response to a cyanide gas release from an abandoned facility containing additional drums of hazardous substances on May 15, 1991. EPA responded to provide assistance to the State. The State of North Carolina issued a Notice of Violation along with a Compliance Schedule to the landowner (PRP) on May 31, 1991. The deadline set by the State for response was September of 1991. The deadline passed and with no response from the PRP.

There are three identified PRPs, Gerald Thacker, Elry and Peggy Holloway, and Al Shakir of Dynamic Industries. Gerald Thacker was the original owner and operator of the Site. Mr. Thacker operated a painting and plating facility from 1966 until it was liquidated in 1978. He then sold the property along with the business and all contents to Elry and Peggy Holloway in May of 1979. Mr. Thacker claims no responsibility to this Site and has refused to participate in removal actions. The Holloways continued operations until June of 1987. The business was then sold to Dynamic Industries for spray painting and parts stripping purposes from June of 1987 until August of 1990. The Site has been vacant and abandoned since Dynamic Industries left the premises. Elery and Peggy Holloway filed Chapter 11 bankruptcy in June of 1991. The Holloways claim they are not financially capable of addressing the Site and offer little concern over the threats this Site poses. The Holloways have refused to respond to Information Requests from EPA. They have refused to assume any responsibility for addressing the Site. There have been comments to EPA from Peggy Holloway stating she wishes the State or EPA would tear down the building. Al Shakir has filed Chapter 13 personal bankruptcy in November of 1991. Upon reviewing the financial statement submitted by Dynamic Industries it reveals the company is financially unable to conduct a removal at this time.

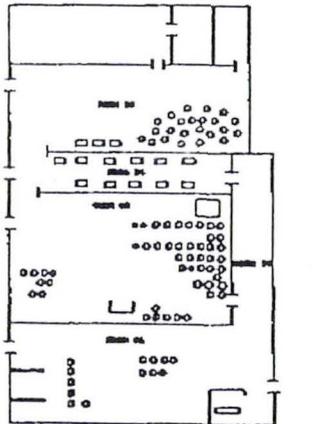
Site was vandalized in April of 1992. All windows and doors were broken allowing the threat of human contact and greater threat of a fire and/or explosion to occur. Several of the Site containers were reported moved and thrown around on-site. EPA secured the facility after the landowner refused to address the problems because they were financially unable to respond. Since this event occurred there have been several threats, verbal and written, stating the facility would be torched. In addition, anonymous phone calls have been made to officials with the Hazardous Waste Branch of the State of North Carolina stating the Site will be torched and burned. EPA received an anonymous letter in June of 1992 stating a PRP offered \$1,000 to have the Site burned. The local Durham County Arson Section as well as the Federal Bureau of Investigations (FBI) was notified of these threats.

RECEIVED
FEB 1 1993
OPERATING SECTION

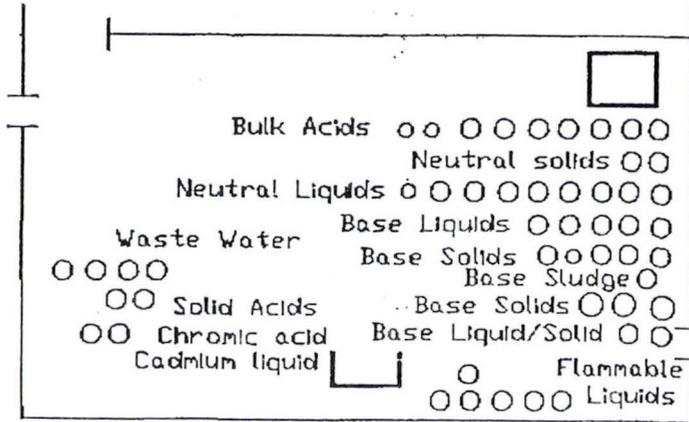


Ross Road

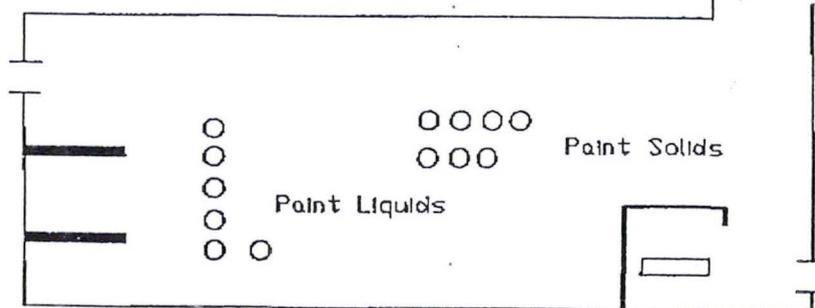
Fountain Street



SITE BUILDING



ROOM #5



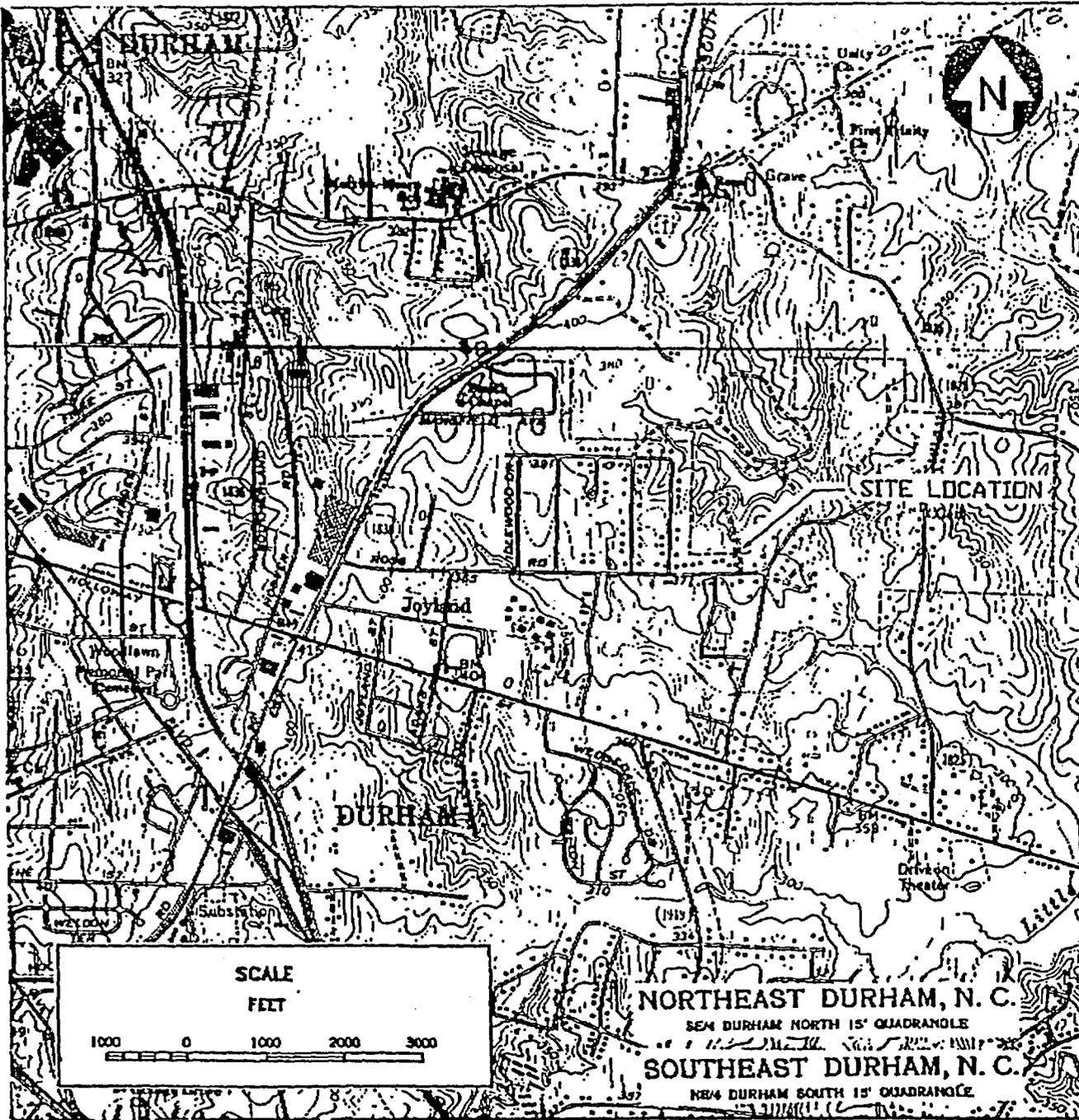
ROOM #6

NOTE: STAGED MATERIALS PRIMARILY 55 GAL. DRUMS

SUPREME FINISHING SITE
STAGED MATERIALS
DURAHM, DURHAM COUNTY, NC
TDD # 04-9208-L019-0597



WESTON MAJOR PROGRAMS DIVISION
REGION IV TECHNICAL ASSISTANCE TEAM



SUPREME FINISHING SITE
 DURHAM, DURHAM COUNTY, NC
 TDD #04-9208-LO19-0597
 SITE TOPOGRAHY MAP

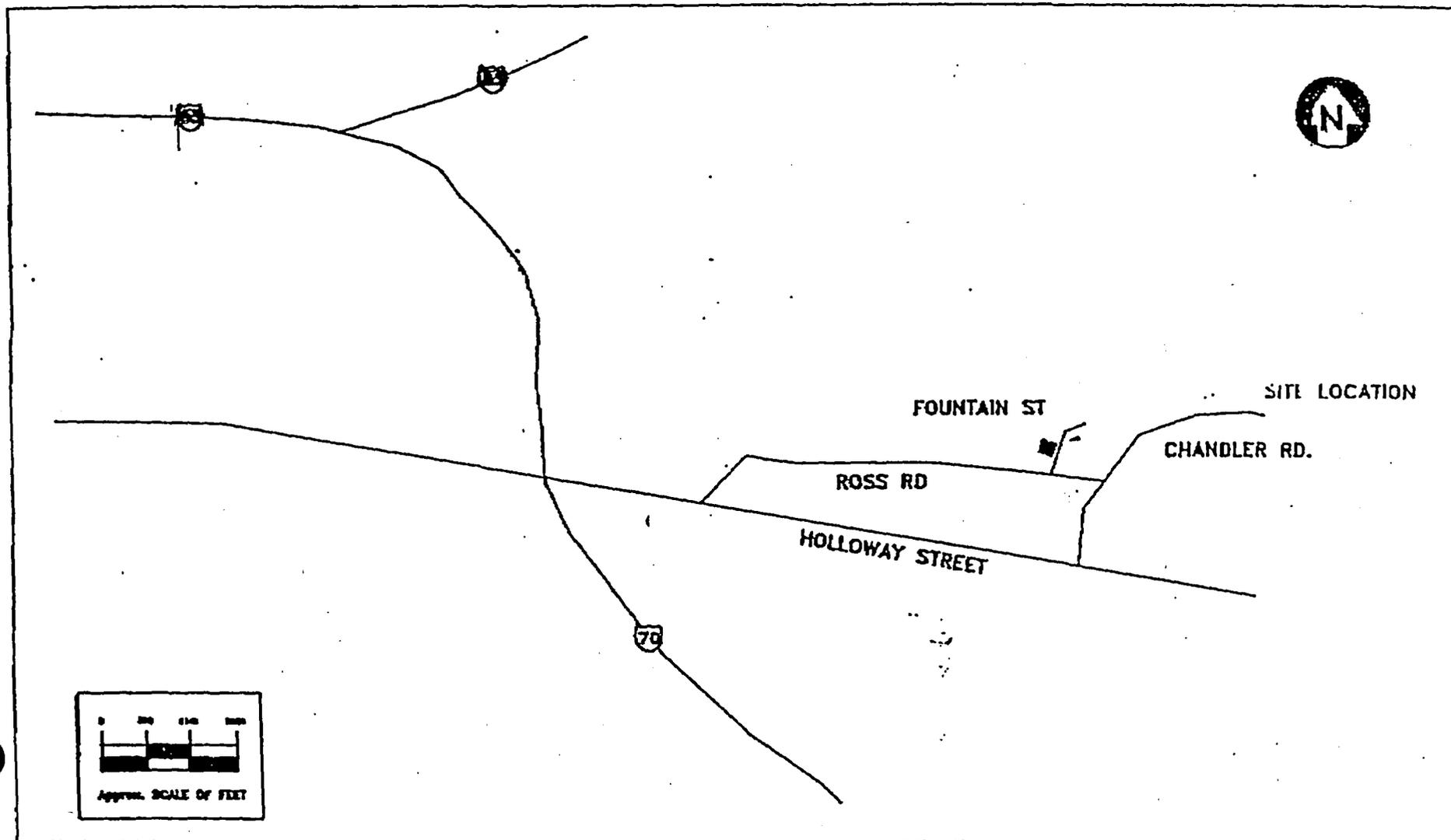


WESTON MAJOR PROGRAMS DIVISION
 REGION IV TECHNICAL ASSISTANCE TEAM

NORTHEAST DURHAM, N. C.
 SE4 DURHAM NORTH 15' QUADRANGLE
 SOUTHEAST DURHAM, N. C.
 NE4 DURHAM SOUTH 15' QUADRANGLE

TEL. 404-322-0659

Dec 04'92 11:22 No.003 P



SUPREME FINISHING SITE
 SITE AREA MAP
 DURHAM, DURHAM COUNTY, NC
 TDD #04-9208-L019-0597

WESTON MAJOR PROGRAMS DIVISION
 REGION IV TECHNICAL ASSISTANCE TEAM

WESTON INC. TEL. 404-302-0039
 DEC 04 92 11:23 AM '003 P. O.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
AUG 10 1992
SUPERFUND SECTION

Date: JUL 20 1992

Bruce Nicholson
Superfund Section
NC Division of Solid Waste Management
P.O. Box 27687
Raleigh, NC 27611-7687

Dear Mr. Nicholson,

We are pleased to provide a copy of the Action Memorandum for the removal at the Supreme Finishing Site, Durham, Durham County, North Carolina. If you have any questions or comments concerning this document, please contact the On-Scene Coordinator at the following address:

Michael Taylor
U.S. Environmental Protection Agency
Waste Management Division
Emergency Response and Removal Branch
345 Courtland St., NE
Atlanta, Georgia 30365
(404) 347-3931

Sincerely,

A handwritten signature in cursive script, appearing to read "Myron D. Lair".

Myron D. Lair, Chief
Emergency Response and Removal Branch

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

ACTION-MEMORANDUM

DATE: JUL 31 1992

SUBJECT: Removal Authorization for the Supreme Finishing Site
Durham, Durham County, North Carolina

FROM: Michael Taylor, On-Scene Coordinator
Emergency Response and Removal Branch

TO: Joseph R. Franzmathes, Director
Waste Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Supreme Finishing Site, Durham, Durham County, North Carolina, hereafter referred to as the "Site".

II. SITE CONDITIONS AND BACKGROUND

The Site is an abandoned plating and painting facility located in a predominantly residential neighborhood adjacent a vacant house. The facility contains various drums, vats, and containers all of which contain hazardous substances as defined in Section 101 (14) of CERCLA, as amended, 42 U.S.C. § 9601 (14). There are minimal site controls in place. The windows and doors have been secured with "NO TRESPASSING" signs mounted around the perimeter. The Site was referred to the Emergency Response and Removal Branch (ERRB) by the Waste Management Branch for North Carolina Department of Natural Resources (NCDNR).

A. Site Description

1. Removal Site Evaluation - On May 15, 1991, EPA Emergency Response and Removal Branch (ERRB) responded to a report from the Hazardous Waste Section for NCDNR, that an abandoned plating facility had a release of hydrogen cyanide gas and contained approximately 40 drums of cyanides, acids and salt wastes. EPA was informed that "conditions immediately dangerous to life

and health (IDLH) existed at the Site". The State hired Four Seasons Industrial Services to overpack and remove nine hazardous waste containers which were sent to Laidlaw Environmental Services in Reidsville, North Carolina. The State claimed their funds were exhausted and could not continue to pursue Site activities. However, hazardous substances on-site continue to present an imminent and substantial endangerment to the public and the environment.

Upon arrival the responding On-Scene Coordinator (OSC), accompanied by the Technical Assistance Team (TAT), found an abandoned block frame building with a small metal storage shed directly behind the main structure. The building is in the middle of an established residential neighborhood. Directly adjacent the Site exists a wooded lot with a drainage ditch to carry runoff from the Site into a pond nearby. TAT conducted perimeter and interior air monitoring. The Hazardous Waste Branch from the State of North Carolina removed the cyanide drums prior to EPA arrival. Air monitoring revealed IDLH conditions no longer existed.

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There is documentation of soil contamination around the perimeter of the facility. Soil sampling and analysis detected elevated metal levels around a drainage area behind the building. This area is suspected to have been caused by a drainage pipe installed by the original owner/operator in 1966.

2. Physical Location - The Site is located at 3033 Ross Road in Durham, North Carolina. This facility is found eight miles southeast of downtown Durham and 12 miles north of Raleigh. Residential single-family homes are directly adjacent the Site. Approximately 20 residential homes with a substantial number of children are located within a one block area. Highway 98 is less than a mile from the Site. The CSX railroad track is three blocks due west in a light industrial setting. Two churches are located less than a mile northwest of the Site. Ross Road is a local schoolbus route for the area.

3. Site Characteristics - Durham county officials condemned the building prior to State and ERRB involvement. The Site consists of an abandoned plating facility that currently stores drums, vats and various containers of plating wastes. The Site poses a potential fire and explosion threat that would affect approximately three to five thousand people within a mile radius. A portion of the property has been placed for sale with a local realtor.

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5. NPL Status - The Site is not listed on the NPL.

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Flammable and/or corrosive labels are found on 50 percent of the containers in the main facility and storage shed.

An air release from a fire and/or explosion from the Site would cause harmful vapors and gases to immediately affect the nearby population.

There are residents located within 100 feet of the Site. This facility operated in the middle of a predominately residential neighborhood. Duke University Hospital is located within four miles and the Raleigh-Durham Airport is located within eight miles of the Site. A public school is located within one mile, as well as three churches and a small shopping area, is in the vicinity. Approximately three to five thousand people would be affected within a mile radius if a fire and/or explosion were to occur.

The Site was subjected to vandalism in April of 1992. This presents a continued health threat to the public as long as there are hazardous substances and waste on-site. There have been threats of burning the Site on numerous occasions by anonymous telephone calls and letters. In addition, there are claims that drums may have been buried behind the facility.

B. Threats to the Environment

The potential for a fire and/or explosion at this Site presents a definite environmental threat through air releases of poisonous gases and vapors. In addition, a release of the hazardous substances would contaminate the surrounding soil as well as surface and groundwater.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal of hazardous substances and off-site RCRA disposal is the only feasible solution for mitigating threats posed by the situation. Site stabilization without disposal would provide only a temporary solution for the Site.

A. Proposed Actions

1. Proposed Action Description - The following actions are proposed for this Site:

- (a) Contain hazardous liquids from the vats.
- (b) Overpack all leaking containers (drums, cans, canisters).
- (c) Segregate and stage all containers on-site.
- (d) Conduct compatibility tests and develop appropriate waste groups for disposal.
- (e) Conduct and obtain soil samples to determine extent of soil contamination around the Site.
- (f) Perform core sampling of the facility to determine soil contamination.
- (g) Determine if there are buried drums on the property.
- (h) Excavate contaminated soil and perform confirmation sampling.
- (i) Arrange for disposal of all hazardous waste to a permitted waste facility.

Confirmation of soil contamination beneath the facility floor may be required. There exists the strong possibility of contamination beneath the concrete and gravel flooring since the facility started operations in 1966. Future sampling and analysis may warrant demolition of the facility. The extent of contamination may increase the ceiling costs for the Site in the future.

2. Contribution to Remedial Performance - This removal action will abate the immediate threats identified in the preceding sections of this Action Memorandum. No further actions are foreseen after removal is complete.

3. Description of Alternative Technologies - Alternative technologies will be considered once the extent of Site contaminants and waste are known.

4. Applicable or Relevant and Appropriate Requirements (ARARs) - The Federal ARARs determined to be appropriate for the Site are the Resource Conservation Recovery Act (RCRA), and the Toxic Substance Control Act (TSCA). Off-site disposal will be conducted in accordance with EPA's Off-Site Disposal Policy as referenced in 53 FR 48218-48234 dated November 29, 1988.

5. Project Schedule - Response action at this Site will be initiated upon approval of this Action Memorandum. Foregoing any unexpected delays, all actions are expected to be completed within six months.

B. Estimated Costs

Extramural Costs:

Regional Allowance Costs:(ERCS)	\$347,350
(15% contingency)	<u>52,103</u>
Subtotal	399,453

Other Extramural Costs Not Funded From the Regional Allowance
 Total TAT, including multiplier costs \$ 36,500

Subtotal, Extramural Costs	\$435,953
Extramural Costs Contingency (20%)	<u>87,190</u>
TOTAL, EXTRAMURAL COSTS	\$523,143

Intramural Costs:

Direct (400 hrs at \$30/hr)	\$ 12,000
Indirect (400 hrs at \$54/hr)	<u>\$ 21,600</u>

TOTAL, INTRAMURAL COSTS	\$ 33,600
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TOTAL, REMOVAL PROJECT CEILING	\$556,743
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action is delayed there is an increased risk of a release to the environment, and an increased risk of fire/explosion, posing a danger to the public health and welfare.

VII. OUTSTANDING POLICY ISSUES

An issue at hand pertains to the State of North Carolina and its off-site disposal situation. The State of North Carolina failed to site its incinerator within the State, which was a requirement of the Southeastern Waste Compact. In reaction to this, some states have attempted to restrict shipment of RCRA and CERCLA wastes from North Carolina. EPA will be considerate of this issue during cleanup and disposal activities.

VIII. ENFORCEMENT

"Enforcement Sensitive"

IX. RECOMMENDATION

This decision document represents the selected removal action for the Supreme Finishing Site, in Durham, Durham County, North Carolina, developed in accordance with CERCLA as amended and not inconsistent with the NCP. This decision is based on the administrative record for the Site. Conditions at the Site meet the NCP section 300.415 (b)(2) criteria for a removal and I recommend your approval of the proposed removal actions. The total project ceiling, if approved, will be \$556,743. Of this, an estimated \$347,350 comes from the Regional removal allowance.

Approval: Michael A. Swen, Deputy Date: 8/5/92

Disapproval: _____ Date: _____