SUBJECT: JUSTIFICATION FOR APPROVAL OF AN IMMEDIATE REMOVAL AT THE GREENBRIER RIVER SITE, ALDERSON, WV (GREENBRIER AND SUMMERS CO.)

FROM: JAMES M. SEIF
REGIONAL ADMINISTRATOR (3RA00)

TO: JACK M. MCGRAW
ACTING ASSISTANT ADMINISTRATOR FOR SOLID WASTE AND EMERGENCY RESPONSE (WH562-A)

ISSUE:
THE ATTACHED CERCLA FUNDING REQUEST PERTAINS TO THE GREENBRIER RIVER SITE, ALDERSON, WV (GREENBRIER CO. AND SUMMERS CO.).
A PRELIMINARY ASSESSMENT, PERFORMED IN ACCORDANCE WITH THE NATIONAL CONTINGENCY PLAN BY MY STAFF AND STATE PERSONNEL HAS IDENTIFIED AN IMMINENT AND SIGNIFICANT THREAT OF HARM TO THE PUBLIC HEALTH, AND AN IMMINENT THREAT TO THE ENVIRONMENT POSED BY THE PRESENCE OF HAZARDOUS SUBSTANCES AS DEFINED IN SECTION 101(14) OF CERCLA.

BACKGROUND:
SECTION 104(a) OF CERCLA AUTHORIZES THE INITIATION OF A REMOVAL ACTION WHENEVER ANY HAZARDOUS SUBSTANCE IS RELEASED OR THERE IS A THREAT OF A RELEASE INTO THE ENVIRONMENT.
PURSUANT TO DELEGATION OF AUTHORITY 14-1-A (4/16/84), WHICH AUTHORIZED THE REGIONAL ADMINISTRATOR TO APPROVE CERCLA REMOVAL ACTIONS WITH A TOTAL COST OF LESS THAN $1,000,000 AND APPROVE EXEMPTIONS TO THE SIX MONTH REMOVAL LIMIT, I HAVE APPROVED THE USE OF CERCLA FUNDS TO CONTROL AND STABILIZE THIS SITE.

ATTACHMENT

ORIGINAL (Red)

SUBJECT: REQUEST FOR APPROVAL OF AN IMMEDIATE REMOVAL AT THE GREENBRIER RIVER SITE, ALDERSON, WV (GREENBRIER CO. AND SUMMERS CO.)

FROM: THOMAS MASSEY, OSC EMERGENCY RESPONSE SECTION (3HW00)
JAN ROGERS, OSC REGION IV
SUSAN FIELDS, OSC REGION IV

TO: JAMES M SEIF
REGIONAL ADMINISTRATOR (3RA00)

THRU: STEPHEN R WASSERSUG, DIRECTOR
HAZARDOUS WASTE MANAGEMENT DIVISION (3HW00)

I. PURPOSE

THE PURPOSE OF THIS IMMEDIATE REMOVAL REQUEST IS TO MITIGATE THE IMMEDIATE AND SIGNIFICANT THREAT TO THE PUBLIC HEALTH AND THE ENVIRONMENT POSED BY DRUMS OF VARIOUS CHEMICALS, FUEL OIL, COMPRESSED GAS CYLINDERS, AND OTHER WASTE MATERIALS ON THE GREENBRIER RIVER SITE, GREENBRIER CO. AND SUMMERS CO., WV. THE THREATS ARE THOSE OF DIRECT CONTACT WITH THE CHEMICALS, FIRE AND EXPLOSION OF UNKNOWN CONTENTS OF DRUMS, AND CONTAMINATION OF PUBLIC WATER SUPPLIES OF THREE TOWNS SERVING A TOTAL OF ABOUT 30,000 PEOPLE. THE FUNDS REQUESTED WILL BE USED TO STAGE, SAMPLE, TRANSPORT, AND DISPOSE OF CONTAINERIZED WASTE MATERIALS FROM THE SITE.

II. BACKGROUND

THE GREENBRIER RIVER SITE IS LOCATED ALONG THE BANKS OF THE GREENBRIER RIVER FROM APPROXIMATELY 4 MILES BELOW ALDERSON, WV UPSTREAM ABOUT 20 MILES TO THE FACILITIES THAT LOST THE MAJORITY OF THE DRUMS. THE DRUMS AND OTHER CONTAINERS ARE CONCENTRATED IN TWO AREAS. ONE BEING WORKMAN ISLAND - THREE MILES DOWNSTREAM FROM ALDERSON, WV AND THE OTHER BEING UPSTREAM , CLOSE TO THE FACILITIES WHERE THE DRUMS WERE LOST.

THE GREENBRIER RIVER WAS THE SCENE OF A MASSIVE FLOOD NOV. 4-6 THAT CAUSED THE DRUMS AND OTHER CONTAINERS TO BE MOVED FROM THE FACILITIES THAT OWNED THEM. THE DRUMS WERE TRANSPORTED DOWNSTREAM AND LODGED ALL ALONG THE RIVER AS THE FLOOD WATERS RECEDED, WITH THE TWO MAJOR CONCENTRATIONS AS ABOVE AS WELL AS ADDITIONAL STRAGGLER DRUMS ALL ALONG THE BANKS OF THE RIVER.

THERE ARE APPROXIMATELY 400 DRUMS ON WORKMAN ISLAND, OF WHICH 10% MAY HOLD PRODUCT, AND AT THE FACILITIES UPSTREAM THERE ARE APPROX. 300 DRUMS, OF WHICH 10% MAY HAVE PRODUCT. ADDITIONAL DRUMS MAY BE BURIED UNDER FLOOD DEBRIS AT THESE LOCATIONS.

THE FACILITIES THAT ARE THOUGHT TO HAVE LOST THE MAJOR PART OF THE DRUMS ARE JIFFY FOAM, INC. AND APPALACHIAN ELECTRIC INSTRUMENTS, INC. IN RONCEVERT, GREENBRIER CO., WV. NEITHER FACILITY HAS EXPRESSED ANY INTEREST AT THIS TIME IN CONDUCTING A CLEAN-UP OF THE DRUMS ALONG THE RIVER.

THE DRUMS ALONG THE RIVER AND AT BOTH MAJOR CONCENTRATIONS ARE UNSECURED AND OPEN TO PUBLIC ACCESS. A NUMBER OF ATTEMPTS HAVE

BEEN MADE BY PUBLIC CITIZENS TO OBTAIN EMPTY DRUMS FOR PERSONAL USE. NATIONAL GUARD UNITS ARE CURRENTLY DEPLOYED IN THE AREA MAINTAINING SECURITY, HOWEVER THESE ARE NEITHER PERMANENT NOR ADEQUATE TO PREVENT PUBLIC ACCESS TO ALL OF THE DRUMS.

AT THE REQUEST OF THE WEST VIRGINIA DNR A PRELIMINARY ASSESSMENT WAS CONDUCTED BY EPA, THE WV DNR, AND THE ROY F. WESTON TECHNICAL ASSISTANCE TEAM (TAT) ON NOV. 15 AND 16, 1985 TO CHARACTERIZE AND IDENTIFY THE HAZARDS POSED BY THIS SITE.

ALTHOUGH NO SAMPLING HAS BEEN PERFORMED TO DATE, THE DRUMS ARE THOUGHT TO CONTAIN PRODUCTS USED OR PRODUCED BY THE UPSTREAM FACILITIES. THESE PRODUCTS MAY INCLUDE PHENOLSULFONIC ACID; ACETIC ACID; TRICHLOROTRIFLOROETHANE; FLUOROCARBONS; SURFACTANTS; AMMONIUM CONTAINING ALKALY ETCHING SOLUTION; SODIUM HYDROXIDE; DYES. ADDITIONAL UNKNOWN MATERIALS MAY BE PRESENT.

AS OF 11/16/85 OSC THOMAS MASSEY HAD USED HIS EMERGENCY AUTHORITY TO AUTHORIZE $50,000 TO BE USED TO ADDRESS MITIGATION OF THE THREATS POSED BY THIS SITE. ON 11/16/85 ERCS MOBILIZED PERSONNEL AND EQUIPMENT ON-SCENE TO BEGIN THE IMMEDIATE REMOVAL RESPONSE UNDER THE DIRECTION OF OSC'S JAN ROGERS AND SUSAN FIELDS.

III. THREAT

THE GREENBRIER DRUM SITE POSES THE THREAT OF DIRECT CONTACT/INHALATION TO THE PUBLIC DUE TO THE PUBLIC'S DESIRE TO OBTAIN EMPTY DRUMS. BY MOVING AND SORTING THROUGH PILES OF DRUMS, CITIZENS RISK EXPOSURE TO TOXIC AND HAZARDOUS SUBSTANCES.

THE SITE POSES AN IMMINENT THREAT TO THE PUBLIC WATER SUPPLIES OF TALCOTT, WV(POP. 2000), HINTON,WV(POP. 16000), AND ALDERSON,WV (POP. 4000), ALL OF WHICH UTILIZE THE WATER FROM THE GREENBRIER RIVER AND HAVE INTAKES LOCATED DOWNSTREAM OF MAJOR DRUM CONCENTRATIONS. SHOULD THERE BE A RELEASE OF TOXIC SUBSTANCES OR HAZARDOUS MATERIALS TO THE GREENBRIER RIVER FROM THE SITE , CONTAMINATION COULD REACH THE TAPS OF ABOUT 22000 CITIZENS. SUCH A RELEASE COULD OCCUR AT ANY TIME IN THE NEAR FUTURE DUE TO SETTLING OF FLOOD DEBRIS, RUPTURED OR DAMAGED DRUMS, PUBLIC CITIZENS TAMPERING WITH THE DRUMS, OR A SECOND MAJOR FLOOD.

IV. ENFORCEMENT

SEE ATTACHMENT.

V. PROPOSED PROJECT AND COST

AT THIS TIME $50,000 HAS BEEN AUTHORIZED UNDER OSC'S EMERGENCY AUTHORITY TO BEGIN ADDRESSING THE HAZARDS POSED BY THIS SITE. PROJECT FUNDS ARE BEING USED TO CHARACTERIZE THE WASTE MATERIALS ON SITE, SEGREGATE FULL AND EMPTY DRUMS AND CONTAINERS, AND STAGE CONTAINERS. FUNDS ARE REQUIRED TO COMPLETE THIS PHASE OF THE REMOVAL AS WELL AS TO SAMPLE, ANALYZE, TRANSPORT, AND DISPOSE OF WASTE ALREADY IDENTIFIED AND EXPECTED TO BE IDENTIFIED AS WORK PROGRESSES.

ESTIMATED COST:

ERCS *	$115,000
TAT	25,000
SUBTOTAL	$150,000

15% EPA ADMIN COSTS	$22,500
INTRAMURAL COSTS	$23,500
TOTAL	$196,000

*ERCS COST ESTIMATE INCLUDES $50,000 OBLIGATION UNDER OSC'S EMERGENCY AUTHORITY.

VI. REGIONAL RECOMMENDATION

BECAUSE CONDITIONS AT THE GREENBRIAR RIVER SITE MEET THE NCP SECTION 300.65 CRITERIA FOR AN IMMEDIATE REMOVAL, I RECOMMEND YOUR APPROVAL OF THIS IMMEDIATE REMOVAL REQUEST. THE ESTIMATED TOTAL PROJECT COSTS ARE $196,000 OF WHICH $115,000 WILL BE OBLIGATED TO ERCS. YOU MAY INDICATE YOUR APPROVAL OR DISAPPROVAL BY SIGNING BELOW.

APPROVE: _____

DISAPPROVE: _____

DATE: _____

ORIGINAL
(Red)

ATTACHMENT

IV. ENFORCEMENT SENSITIVE

INITIAL VERBAL CONTACTS WITH PRP'S PRODUCED A HESITANCY TO TAKE RESPONSIBILITY FOR CLEANUP ACTIONS ON THE RIVER. ADDITIONAL CONTACTS WILL BE MADE WITH SENIOR OFFICIALS OF JIFFY FOAM, INC. ON MONDAY, NOVEMBER 18, WHEN THEY CAN BE CONTACTED. CURRENTLY, THE JIFFY FOAM FACILITY IS CLOSED. NO NOTICE LETTERS OR ADMINISTRATIVE ORDERS HAVE BEEN ISSUED TO DATE DUE TO THE EMERGENCY NATURE OF THE INCIDENT AND A NEED TO ACT PROMPTLY TO PROTECT THE DOWNSTREAM DRINKING WATER INTAKES.

THE SITE IS NOT ON THE NPL.

ORIGINAL
(Red)