To: Linden, melissa[linden.melissa@epa.gov]
Cc: Matlock, Dennis[Matlock.Dennis@epa.gov]
From: Burns, Francis
Sent: Sun 1/26/2014 6:02:58 PM
Subject: RE: Updates

Melissa, Dennis

Thanks,

Fran

From: Linden, melissa
Sent: Sunday, January 26, 2014 12:55 PM
To: Burns, Francis
Cc: Matlock, Dennis
Subject: Updates

The facility is continuing to pump water from outside of the secondary containment area. This water is now being pumped to Tank 400. The majority of the site is frozen over and most of the holes/sumps dug inside the tank containment are frozen over and cannot be pumped. The facility attempted to dig a hole behind Tank 394 and about 3' down there was only loose fill and not the gravel and compacted soil they expected. The objective was to install a vertical French drain to use to vacuum product from under the tanks because of the loose fill and brick debris it was determined that it would not be effective in recovering product. Therefore, the hole was filled in with concrete.

Ice in the river continues to be a significant issue with regards to maintaining the river boom in place. Clean Harbors continues to attempt to break ice and maintain the river booms in proper position. It was decided that because of the ice, once the boom is repositioned further from the river bank it will be allowed to freeze in place and Clean Harbors will no longer break the ice behind it.

Freedom Industries' remediation consultants, CEC, are scheduled to meet with WVDEP and EPA on Monday, January 27, 2014, to discuss the remediation plan.

Overnight the facility broke the surface ice on the containment trench on the bench at the base of the hill and pumped out the water to maintain a safe freeboard and prevent potential overflow. Freedom Industries reported that water was found to have seeped in underneath the liner in the containment trench on the bench below the tank farm. WV DEP, OSC Linden, Freedom Industries and their contractor to discuss removal of the water and repair of the poly liner after removal of the water. It was decided in the meeting that the facility would add salt to melt the ice in the trench and pump out the water. After the water is pumped out, they plan to cut the polyethylene liner above the trench and roll back the liner to allow water and potentially product that has accumulated to be pumped out. After the material is removed, they will roll the polyethylene liner back in place in the trench and toe the cut end of the liner back into the hillside in order to collect surface runoff and attempt to also collect water and potential product migrating downslope in the subsurface soil and fill material.

There have been four orders issued by WV DEP thus far in the response. The first two were issued on January 10, 2014 one was the cease and desist all operations on-site at Freedom Industries, except for transporting material off-site, the second was that all 14 tanks and products stored on-site should be removed by March 15, 2014. The third order was issued on January 22, 2014 ordering Freedom Industries to report all information about MCHM/PPH in the product that was in tank 396 as well as update the total of all products still left on-site. The fourth order was issued on January 24, 2014 stating that dismantling of the facility must begin by March 15, 2014.