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From: Kelly, Jack (R3 Phila.)
Sent: Wed 3/12/2014 8:58:31 PM
Subject: FW: HOTSITE REPORT: Update - Freedom Industries, Charleston, WV

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From: Burns, Francis
Sent: Wednesday, March 12, 2014 4:55 PM
To: R3 HOTSITES
Subject: HOTSITE REPORT: Update - Freedom Industries, Charleston, WV

OSC Melissa Linden reported that the facility installed perforated pipe and gravel to create a sump outside the containment area. The facility continues to pump water from outside the containment wall in the new sump, the interceptor trench, the oil/water separator, and the sump within the containment area along the back wall. The facility has pumped out all of the liquid material that was in the heel of Tank 393, now just a semi-solid heel of fatty acid is left. WVDEP has approved adding caustic soda to liquefy the fatty acid heel in Tank 393, so that it can be pumped out and sold. Approximately 6 tanker truck loads are left in Tank 393. The facility continues to pump out the heel, which is also fatty acids, in Tank 394.

The facility is also continuing to work on cleaning tanks when the temperature is warm enough. The facility's contractor collected a sample of RDC-777 from Tank 203 for EPA CID today. The facility anticipates having all material removed from the tanks on-site by March 15, 2014 to comply with the WVDEP order. Dry products, sealed bags of polymers, stored in the garage of the facility were not included in the order and are being sold as orders are received.

Freedom Industries anticipates all wastewater being stored at the POCA Blending Facility (POCA) will be transported to Waste Management DSI by the end of the week. Then cleaning of the baker tanks will begin at POCA and the all MCHM/PPH product will be contained in double wall baker tanks.

The facility's contractor sampled both the sump outside the containment wall and the interceptor trench for the weekly trend analysis. The facility has also submitted the draft tank decommission plan to WVDEP and the plan notes that three of the tank gaskets tested positive for asbestos. The facility anticipates having the draft remediation plan by the end of the week to WVDEP. The plan will summarize all actions taken to date and the plan for moving forward.

The facility is still pursuing tests for on-site treatment of the waste water. The two possible options are the bio-activated sludge with ultra-filtration and an advanced oxidation process. The facility is still asking WVDEP to consider a direct discharge permit if the post-treatment wastewater shows non-detectable levels of MCHM/PPH. In addition, WVDEP is meeting with Salt Rock PSD WWTP near Hurricane, WV to discuss the WWTP's ability to accept the wastewater from the facility.