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SITE: Circle Env #2  
BREAK: 2.9  
OTHER: \_\_\_\_\_

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

**Date:** September 21, 2007  
**Subject:** Circle Environmental #2 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 #2 Site under the FOOSC's \$250,000 authority and updates the Action Memorandum dated September 14, 2007.

**II. BACKGROUND**

**Site No:** A4RD  
**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 #2 Site (CE#2 or Site) is located at 2222 Albany Highway (Highway 520) in unincorporated Terrell County, Georgia. CE#2 is approximately 100 X 100 feet in size and is located on private property owned by a third party. It lies immediately adjacent to a busy highway and is unsecured to prevent unauthorized access. The nearest population center is Dawson, Georgia, less than 1 mile from the Site



**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 CE#2 is associated with a Circle Environmental facility (CE#1) located in downtown Dawson, Georgia, approximately 2 miles south of CE#1. The FOOSC 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 at the Site. The majority of the drums appeared to be open and contained accumulated rainwater suspected of being contaminated with waste oil and/or hazardous substances.
- Two open-top, roll-off boxes and a third open container appearing to be a peanut trailer. One of the roll-off boxes and the peanut trailer were partially filled with solvent and/or oil contaminated wipe rags.
- The Site was unsecured to preclude public access and is located within 100 feet of a busy highway.
- The Site is located immediately adjacent to an operating business.
- Residential and commercial areas are located within ¼ mile of the Site.
- A private water-well is located within 20 feet of the Site.

**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, organic solvents, and possible tetrachloroethylene.

**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 adjacent to a busy highway and an operating business. The owner of the business lives on the premises. It is also located within a short distance from other commercial and residential areas. The Site is unsecured to preclude public access. Anyone entering the Site may potentially come in contact with and be exposed to hazardous substances and/or waste oil. A fire at the Site might result in airborne release of hazardous substances, pollutants, or contaminants.

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

A private water-well is located within 20 feet of the Site. Release of hazardous substances, pollutants, or contaminants from the Site may threaten this groundwater source.

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 stored at the Site. The majority of these drums appeared to be open and contained accumulated rainwater that was suspected of containing hazardous substances. Drums that were not open were suspected of containing hazardous substances, pollutants, or contaminants. The roll-off box and peanut trailer containing contaminated rags were completely open to the atmosphere and could be a source of direct contact to the public or leaching of contaminants to the environment by rainwater.

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 has not been evaluated at this Site. Soil contamination could take place, however, through direct dumping of hazardous substances from containers located on the Site or through leaching of hazardous substances, pollutants, or contaminants from the potentially contaminated rags stored within the open roll-off box and peanut trailer.

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

Rainfall could leach hazardous substances from the potentially contaminated rags in the roll-off box and peanut trailer at the facility.

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#2, 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 at the Site.
- Inventory and documentation written and photographic documentation of all drums and other containers at the Site..
- Preliminary segregation and staging of drums for waste-stream characterization and disposal profiling.
- Inspection of the contents of all drums and other containers and hazard characterization and sampling, as appropriate.
- Further segregation and staging of drums and other containers 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**

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

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.

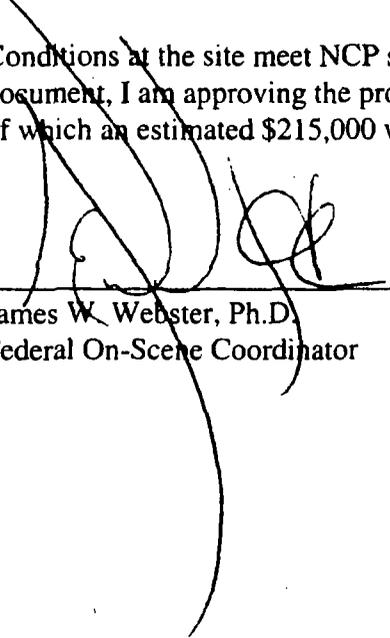
**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

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 commercial and/or residential areas in the immediate vicinity of the Site.

**IX. APPROVAL**

This decision document represents the selected removal action for the Circle Environmental #2 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.



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

*Sept 21, 2001*

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Date