PCB Remedial Actions
RCRA Subtitle C - Small Quantity Generator

Central Moloney, Inc.
Pine Bluff, Arkansas
Central Moloney, Inc. Facility
Pine Bluff, Arkansas
Background

- 1981: Central Moloney, Inc. (CMI) identified as a potential source of the PCBs in Lake Pine Bluff as the result of a Federal Clean Lake Study.
- 1982: CMI implemented a clean up on their facility property according to the approved plan.
- 1996: Consent Administrative Order LIS 96-083 was executed to govern the investigation and clean up of VOCs at the CMI facility.
- 2007: Emergency Order LIS 07-093 was issued to address a release of oil containing PCBs from the facility which had entered the stormwater drainage system.
  - Based off 9/12/07 complaint investigation that confirmed a release of PCB oil from the site to the offsite drainage.
  - During a meeting with the facility on 9/12/07, CMI acknowledged that the release had been ongoing for some weeks.
Remedial Actions
September 2007

Oil seeps and excavation - North Bay area
Remedial Actions
September 2007

Pipes and rail tracks underneath building - North Bay area
Remedial Actions
September 2007

Cut pipe with oil seep - South Bay area
Remedial Actions
September 2007

Plastic sheeting covering oil/water mix - South Bay area
December 2007

• As part of the routine site inspection performed by the site’s contractor handling the PCB clean up, a seep in a concrete cut out which acted as a sump for stormwater and oil was observed in the drainage ditch running along Fir Street (downstream of elementary school).

• Oil in concrete cut out sample result was 36 ppm for PCB.

• Oil in Fir Street ditch sample result was 39.4 ppm for PCB.
CMI and Elementary School
North culvert with oil sheen before hydroexcavation.
Fir Street ditch with temporary fence after hydroexcavation.
Water is sheen free upstream from culvert after hydroexcavation.
Contractor pressure jetting storm drain that connects South Bay to ditch along Fir Street.
Remedial Actions
December 2007

Strom drain after pressure jetting.
2008 Activities

- Continuation of clean up and removal of contaminated materials.
- Increased inspections for new seeps.
- Stormwater diversion away from areas prone to oil seeps and containment of stormwater within areas affected by seeps.
- Additional investigation into possible source(s) of oil seeps.
July 2009

- There was an approved excavation of sediment from a ditch originating near the center of the Central Moloney, Inc. property which flows south towards the elementary school property.
- One PCB sample result was for 6.2 mg/kg which exceeded the cleanup level of 5.44 mg/kg.
- Sediment was removed within 10 feet upstream and downstream of the sample point with confirmation sampling results ranging from non-detect to 0.051 mg/kg.
Remedial Actions

July 2009

Drainage Ditch before excavation

Drainage Ditch after excavation
Remedial Actions

July 2009

Excavated material was loaded in lined roll-off bins until characterized and properly disposed. (Non-TSCA)
Current Activities

• Oil skimmers are operated in stormwater sumps for areas affected by seeps.
• A consultant routinely inspects the facility for new seeps, and collects/disposes of oil contaminated materials.
• The potential sources of the seeps have been investigated; however no conclusive results have been determined.
• Quarterly reporting documents clean up activities.
TSCA Activities

- November 2007 – CMI’s contactor submitted a request to the EPA to allow disposal of soil with less than 50 ppm PCB in Subtitle D landfill and soil with greater than 50 ppm in a Subtitle C landfill under the Mega Rule.
- No response from the EPA within 30 days. 
- Soil was disposed of from the 2007/2008 activities according to the Mega Rule.
- July 2009 - EPA responds to the Nov. 2007 letter by requesting site records. CMI’s contractor responded with requested information. No additional contact from EPA.
- October 2009 – Soil/sediment collected during work on drainage ditch was disposed of in a Non-TSCA facility.