



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER

61 FORSYTH STREET, S.W.

ATLANTA, GEORGIA 30303

**\$250,000 ACTION MEMORANDUM**

DATE: January 27, 2011

SUBJECT: Action Memorandum for a Removal Action at the Holcomb Creosote site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

FROM: Karen Buerki, On-Scene Coordinator  
Emergency Response and Removal Branch

THRU: A. Shane Hitchcock, Chief  
Emergency Response and Removal Branch

TO: Franklin E. Hill, Director  
Superfund Division

**I. Purpose**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Holcomb Creosote Site located in Yadkinville, Yadkin County, North Carolina, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

**II. Site Information**

**A. Site Description**

Site Name: Holcomb Creosote  
Superfund Site ID (SSID): B4E6  
NRC Case Number: 965285  
CERCLIS Number: NCD024900987  
Site Location: 5016 US Hwy 601  
Lat/Long: 36° 09' 29"/-80° 40' 32"  
Potentially Responsible Party (PRP): Holcomb Creosote Company  
NPL Status: Non-NPL  
Removal Start Date: January 21, 2011

**B. Site Background**

**1. Removal Site Evaluation**

A Removal Site Evaluation was conducted on January 20, 2011, at the request of the North Carolina Department of Environment and Natural Resources (NCDENR). Holcomb Creosote Company has been working with their consultant, Northwest GeoScience, to characterize the site. In the Northwest GeoScience report of their July 2010 sampling event, creosote contamination was discovered adjacent to and underneath the concrete pit and in the drip pad area. A NCDENR Notice of Violation dated November 23, 2009, describes a RCRA impoundment that was closed in

1983 and a landfarm that was used to treat the contents of the impoundment. NCDENR also performed sediment sampling in June 2009, which revealed sediment contamination. Tanks containing creosote, creosote sludge, diesel fuel, and fuel oil, and an open concrete pit containing waste creosote and wastewater treatment sludge (F034/K001) remain on-site. There is no secondary containment for the tanks. There are numerous drums and heavily stained soil throughout the process area. Inside the boiler room, suspected asbestos insulation, around the boiler and capping the insulating jacket at the end of the pressure vessel, had cracked off and was accumulated on the dirt floor. Stained soil was observed throughout the boiler room. During the evaluation, visible sheen was observed being released from the sediment of a tributary to Deep Creek adjacent to the facility. NRC Report #965285 was made and an emergency response was initiated to mitigate the ongoing release of hazardous substances to the environment.

## 2. Physical location and Site characteristics

Holcomb Creosote Company  
5016 US Highway 601  
Yadkinville, North Carolina 27055

Holcomb Creosote Company is located just north of Yadkinville on Hwy 601. It is situated between the highway and a tributary of Deep Creek. Stormwater run-off flows to the southeast to the tributary. This tributary feeds into Dobbins Mill Pond at the southern boundary of the facility. There is a residential neighborhood to the south, bordering Dobbins Mill Pond, and Grace Bible Church adjacent and to the north. The surrounding area is classified Low Income to the east and Non-EJ Area to the west on the map of potential Environmental Justice (EJ) areas generated by the Office of Environmental Accountability.

Holcomb Creosote Company was a creosote wood treating company. It began operations in the 1950s and went out of business in February 2009. Tanks containing creosote, creosote sludge, diesel fuel, and oil, and an open concrete pit containing waste creosote and wastewater treatment sludge (F034/K001) remain on-site. There is no secondary containment for the tanks. The facility consists of a warehouse, office, and boiler room in one building, one pressure vessel, a 50'x80' metal building that covers the drip pad, a RCRA impoundment closed in 1983 and associated RCRA landfarm. The facility is not secured in any way.

## 3. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant

Creosote is a hazardous substance as defined by section 101(14) of CERCLA and contains carcinogenic polynuclear aromatic hydrocarbons (PAHs), specifically, benzo(a)anthracene, chrysene, dibenzo(a,h)anthracene, and ideno(1,2,3-cd)pyrene, as identified in the September 2002 ATSDR Toxicological Profile for Coal Tar Creosote. Heavily stained soil is visible throughout the process area. Waste creosote and process sludge are RCRA F034/K001 listed wastes, also hazardous substances as defined by section 101(14) of CERCLA. Waste creosote and process sludge are contained in an open concrete pit and in an unsecured 1000 gallon tank adjacent to it that is beginning to leak. There are three horizontal tanks used to supply fuel oil to the boiler. One of the tanks contains oil and is leaking. There is a 10,000 gallon creosote tank associated with the "old" plant that is approximately half full. The insulation for this heated tank has burned off and the tank is severely pitted. There is no secondary containment in this area. There is a 10,000 gallon creosote tank associated with the "new" plant as well. It contains at least 4,000 gallons of creosote according to the PRP and has also had its insulation burn off and has no secondary containment. The "new" plant used diesel fuel stored in a 10,000 gallon tank. There is some diesel stored in the tank. There is no secondary containment.

Friable asbestos insulation is crumbling off of the boiler onto the floor and an asbestos seal around the pressure vessel insulating jacket is cracking. START contractor Tetra Tech collected samples of the boiler material for asbestos analysis. The results dated January 27, 2011, show 80% Chrysotile. Asbestos is a hazardous substance as defined by section 101(14) of CERCLA.

An unsealed manometer, containing approximately two ounces of elemental mercury, was found in the boiler room. Mercury beads were visible on the outside of it and on the ground below it. A Lumex 915+ mercury vapor analyzer was used to confirm the presence of mercury in soil and some debris in the boiler room. Mercury is a hazardous substance as defined by section 101(14) of CERCLA.

### III. Threats to Public Health Welfare or the Environment

#### A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants

Uncontrolled hazardous substances on the Holcomb Creosote Site pose a threat to public health or welfare or a threat to the environment through direct contact exposure to creosote, asbestos, and mercury and stormwater run-off to and a potential release from tanks without secondary containment to a tributary of Deep Creek.

#### B. Applicable factors which were considered in determining the appropriateness of a removal action:

- ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [40CFR§300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [40CFR§300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [40CFR§300.415(b)(2)(iii)].
- ☒ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [40CFR§300.415(b)(2)(iv)].
- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [40CFR§300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [40CFR§300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [40CFR§300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [40CFR§300.415(b)(2)(viii)].

### IV. Selected Removal Action and Estimated Costs

#### A. Situation and Removal Activities to Date

##### 1. Current Situation.

The Holcomb Creosote Company has been out of business since February 2009. The creosote plant is a source of uncontrolled releases and potential for release of hazardous substances to the environment.

## 2. Removal activities to date:

### a. Federal Government/Private Party

The Holcomb Creosote Company has undertaken measures to characterize the contamination; however, they do not have the assets to conduct a Removal Action.

### b. State/Local

NCDENR has been in negotiations with the Holcomb Creosote Company to remedy RCRA violations; however, they do not have the assets to comply.

## 3. Enforcement

The PRP is Holcomb Creosote Company. The PRP stopped treating wood in February 2009 and sold its assets at auction in September 2009. The remaining assets of the company are tied up in real estate, according to email correspondence sent to NCDENR on October 13, 2010, and to EPA on January 20, 2011, rendering the company not viable to perform a Removal Action. Access was granted by the PRP verbally in a meeting at the Law Offices of Lee Zachary on January 20, 2011.

## B. Planned Removal Actions

### 1. Proposed action description

a. Prepare a Health and Safety Plan.

b. Remove tree limbs left by the logging company from the banks of the tributary to provide access.

c. Place sorbent boom to capture sheen.

d. Prepare a staging area to store contaminated debris and stabilized sludge. Stabilize the F034/K001 sludge and stockpile pending analysis for disposal. Dispose of F034/K001 sludge.

e. Consolidate drummed and containerized wastes and provide for disposal.

f. Stabilize friable asbestos in the boiler room.

g. Remove mercury from the boiler room and provide disposal.

### 2. 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 Holcomb Creosote Site.

### 3. ARARs

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

#### 4. Project Schedule

Approximately two weeks are needed to perform the tasks to stabilize the threats posed by the Holcomb Creosote Site. Additional removal actions are anticipated, however, they are outside the scope of this Action Memorandum due to cost.

#### C. Estimated Costs\*

Contractor Costs	
ERRS - ER, LLC	\$200,000
START - Tetra Tech	\$50,000
Other Extramural Costs	\$0
Contingency Costs	\$0
<b>Total Removal Project Ceiling</b>	<b>\$250,000</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

#### V. Expected Change in the Situation Should Action Be Delayed or Not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

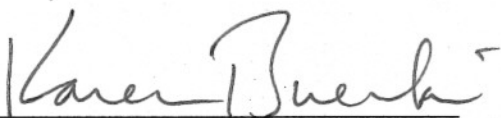
#### VI. Outstanding Policy Issues

None

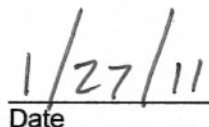
#### VII. Approvals

This decision document represents the selected removal action for the Holcomb Creosote Site, developed in accordance with CERCLA, as amended, and not inconsistent with the National Contingency Plan (NCP). This decision is based on the administrative record for the Holcomb Creosote Site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document I am approving the proposed removal actions. The total project ceiling is \$250,000; this amount will be funded from the Regional removal allowance.



Karen Buerki  
On-Scene Coordinator



Date