



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER

61 FORSYTH STREET, S.W.

ATLANTA, GEORGIA 30303

February 9, 2011

SFD/ERRB

Mr. James Bateson
North Carolina Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, NC 27605

SUBJECT: Request for Identification of State ARARs
Holcomb Creosote Site
Yadkinville, Yadkin County, North Carolina
EPA ID: NCD024900987

Dear Mr. Bateson:

As the State of North Carolina has been informed, the Superfund removal program of the United States Environmental Protection Agency (EPA) is considering a removal action at the Holcomb Creosote Site (the Site) located at 5016 US Hwy 601, Yadkinville, Yadkin County, North Carolina. To perform this action, EPA will attempt to comply, to the extent practicable, with all Applicable or Relevant and Appropriate Requirements (ARARs) of State environmental and facility siting laws. This letter is a request that the State notifies the EPA On-Scene Coordinator (OSC) of any State statutes or regulations that the State believes are potential ARARs to the removal site. This letter also contains information about site conditions and proposed actions to assist you in identifying potential ARARs.

The types of ARARs that will be considered in this removal action fall into the following three categories: chemical, location, and action-specific requirements. Chemical-specific requirements are health, technology, or risk based numeric values that establish the acceptable amount or concentration of a chemical that may be found in, or discharged to, the ambient environment. Location-specific requirements are restrictions placed on the concentration of hazardous substances or the conduct of activities solely because they occur in special locations. For example, the requirement that hazardous waste storage facilities located within the 100-year flood plain must be designed, constructed, operated, and maintained to avoid washout is considered a location-specific requirement. Action-specific requirements are technology or activity based requirements or limitations on actions taken with respect to hazardous waste.

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.

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 that contained 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.

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 were contained in an open concrete pit and in an unsecured 1000 gallon tank adjacent to it that is beginning to leak. These sludges have been solidified and stockpiled for disposal. 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 8,000 gallons of creosote 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. Further releases are imminent if no action is taken.

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. Further releases are imminent if no action is taken.

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. Further releases are imminent if no action is taken.

EPA plans to conduct a time-critical removal action. EPA's proposed actions include the following: 1) removal of all hazardous substances in drums, process units, and tanks, and disposal of same; 2) asbestos abatement and disposal; and 3) excavation and disposal of contaminated soil and sediment and restoration of the excavation site. In order to adequately consider and comply with any ARARs specified by the State of North Carolina, EPA would appreciate a timely response (within 7 days if possible) to this request so that the requirements may be considered for the removal action. Exact references or citations to the statutes or regulations, or copies of pertinent provisions of State requirements, will greatly facilitate our ability to evaluate these requirements as ARARs for the Site.

EPA will examine these requirements and determine whether they are applicable or relevant and appropriate to the Site. Pursuant to 40 CFR 300.415(j), fund-financed removal actions shall, to the extent practicable considering the exigencies of the situation, attain ARARs under federal environmental or state environmental or facility siting laws. It is important to clarify, however, that some requirements identified by the State may be determined not to be ARARs, may be determined to be impracticable to meet, or may qualify for a waiver. Please call me at (404) 229-9516, if additional information on the Site is needed for the purpose of completing the ARARs review. Thank you for your assistance on this matter.

Sincerely,



Karen Buerki
On-Scene Coordinator