

**ATLANTIC WOOD INDUSTRIES SITE: VENEER ROAD STORM DRAIN  
MITIGATION REMOVAL ACTION**

**POLREP #1 AND SPECIAL BULLETIN A  
NOTICE OF \$ 50K ACTIVATION**

ELM AVENUE AND VENEER ROAD  
PORTSMOUTH, VA 23704

EVENT: TIME-CRITICAL REMOVAL ACTION

ATTN: RRC, F. BURNS, D. WRIGHT, R. STURGEON

I. SITUATION (9/23/13)

- A. The Atlantic Wood Industries Superfund Site (“AWI” or “Site”) is undergoing construction activities which include a storm sewer extension and a groundwater collection trench. During construction of this phase of the project, the Remedial Project Manager learned that one of the storm drain discharge boxes is heavily contaminated with creosote. Thick creosote wastes were discovered when the drain box was opened by the contractors. Beneath approximately two inches of water, creosote waste up to 12 inches deep, and an estimated volume of 2-4 cubic yards of heavily contaminated sediment was discovered.
- B. The drain box is constructed from circular layers of red brick and is not in the best structural condition.
- C. The creosote contamination in the drain appears to have migrated from subsurface soils upgradient of the box in two directions. This historic contamination is migrating into the drain directly from a heavy creosote contaminated area and also from an underground subsurface pipe which is also contaminated.
- D. This contamination is currently migrating directly into the Southern Branch of the Elizabeth River.
- E. The RPM for the Site requested assistance from the Removal Program to mitigate the threat of creosote discharge to the Southern Branch of the Elizabeth River. The creosote could also contaminate the brand new storm drain extension as it goes to the river.

II. CURRENT ACTIONS

- A. Work is currently progressing in the Remedial Action phase on this portion of the Site. However, this heavy pocket of contamination is threatening to contaminate new construction of containment areas and also the Elizabeth River.
- B. This storm drain box received surface water discharge from a sewer system in the vicinity of the Site. The non-contaminated storm water is travelling into the contaminated drain box through a heavily contaminated

pipe. This causes relatively uncontaminated surface water to potentially become heavily contaminated. The contaminated water then discharges into the new construction area and into the Elizabeth River.

- C. Creosote, a known contaminant at the AWI Site, is a listed hazardous substance under 40 CFR 302.4.
- D. Based on a removal assessment, the OSC has determined that this uncontrolled release of creosote into the environment poses an imminent and substantial threat to public health, welfare, and the environment.

### III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT

- A. The National Contingency Plan 40 CFR 300.415(b)(2) requires the lead agency consider the following factors in determining the appropriateness of a removal action:

- B.

- (i) Actual or potential exposures to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;*

EPA contractors on the AWI Site are working in the immediate vicinity of the creosote contaminated sewer line. Most of the work they are performing is downgradient and also beneath the elevation of the sewer box. Overflow of the sewer box will threaten to expose the workers to uncontrolled quantities of creosote. Creosote can cause skin rashes and skin burns as well as irritation of the respiratory tract. Chronic exposure to creosote can have long-term effects.

- (iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;*

During cleanout of the storm drain box, EPA contractors discovered close to a vertical 12 inches of creosote waste. The waste is still in sludge form and is not contained within the soil. The creosote is migrating both from an old underground sewer pipe as well from a crumbling sewer box. The creosote trapped inside of this box is potentially contaminating water passing through. This source of contamination is causing more creosote contaminated water to pass through the Site and into the Elizabeth River

- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;*

The contaminated storm drain is a topographic low point in the Veneer Street area of the Site. The drain box receives runoff from three street-level storm drains. Also, because of the elevation of the

box and its proximity to the tidal river, the area around the box is often flooded. This drain cannot be blocked or removed because the street would flood. Removal actions are necessary to clean out the contaminated sewer pipe and also to replace the historic brick sewer box with a less permeable and stuctually sound sewer box.

*(vii) The availability of other appropriate federal or state response mechanisms to respond to the release;*

The proposed action is intended to mitigate a threat of release from an existing Superfund NPL Site. The Site is a fund-led cleanup and is under EPA's direction. EPA is the Agency responsible to ensure the release is secured.

*(viii) Other situations or factors that may pose threats to public health or welfare of the United States or the environment;*

The EPA Region III Hazardous Substance Cleanup Division has listed the Elizabeth River as one of the priority areas for cleanup during this time. Other actions, both privately and public funded, are ongoing to mitigate and/or remove creosote contamination in the Elizabeth River. If the proposed action is not mitigated, the influx of creosote contaminated water may damage or diminish other ongoing cleanup actions in the Elizabeth River.

#### IV. OSC ENDANGERMENT DETERMINATION

A. Based on an onsite assessment performed by the OSC, the OSC has determined that the conditions at the Site pose an imminent and substantial threat to public health, welfare, and the environment due to the uncontrolled release of creosote into the Elizabeth River. Under Delegation of Authority 14-2 of CERCLA, the OSC is initiating a removal action and is initiating funds of \$ 50,000 to begin response actions to mitigate the threat posed by the release of creosote contamination in and leading into a sewer and storm drain box on Veneer Street within the boundaries of the Atlantic Wood Industries Superfund Site. This removal action is consistent with the requirements of 40 CFR 300.415b(1).

#### V. PLANNED RESPONSE ACTIONS

A. Based on the OSC's assessment, the following actions are necessary to mitigate the imminent and substantial threat posed by the uncontrolled release of hazardous substances:

1. Clean out the creosote contaminated underground pipe leading into the storm drain pipe and line if necessary;

2. Remove and properly dispose of the contaminated historic brick drain box;
3. Replace the drain box with a more secure, less permeable box;
4. Perform “pump-around” of incoming storm water while response actions are taking place

VI. ESTIMATED COSTS

ERRS:	\$ 42,000
EPA:	\$ 8,000
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	\$ 50,000

VII. FUTURE ACTIONS

- A. The OSC will coordinate with the RPM to ensure actions are performed consistently with the remedial construction
- B. EPA will coordinate with City of Portsmouth officials to ensure new construction is consistent with local and Commonwealth codes;

IX. ADMINISTRATIVE RECORD

- A. The following documents were used to make the determination above and constitute the Administrative Record for the Site in accordance with 40 CFR 300.810.
  1. Documentation of onsite findings
  2. Photographs
  3. Creosote Hazardous Substances Database Info
  3. Pollution Report #1 and Special Bulletin A

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