



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

4WD-ERRB

AUG 31 2006

Mr. Mark Smith  
Georgia Environmental Protection Division  
205 Butler Street  
Suite 1154 - East Tower  
Atlanta, GA 32301

Subject: Camilla Wood Preserving Site, Camilla, Mitchell County, Georgia

Dear Mr. Smith:

The U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) conducted a Removal Site Evaluation (RSE) at the above referenced site for potential removal action eligibility under the National Contingency Plan (NCP).

Based on the information collected during the RSE, the On Scene Coordinator (OSC) recommends this site be given a **high priority** for removal eligibility under EPA's Superfund Removal Program. (See attached RSE memo)

A final determination of removal eligibility will be made by the OSC assigned to the site. A decision to conduct a removal action will be documented in an Action Memorandum and a copy will be forwarded to the State. Should the OSC make a final determination that a removal action is not warranted you will be subsequently notified of this determination.

Should you have any questions concerning ERRB's determination, please contact Leo Francedense, OSC at (404) 562-8772, or Jim McGuire, Chief of Removal Operations Section, at (404) 562-8911.

Sincerely,

A handwritten signature in black ink, appearing to read "A. SH", written over a large, stylized scribble.

A. Shane Hitchcock, Chief  
Emergency Response & Removal Branch

Enclosure

cc: Bob Rosen, EPA  
Tony Moore, EPA  
Jim McGuire, EPA  
Debbie Jourdan, EPA  
Leo Francedense, EPA

**RAT NOTIFICATION AND PRIORITY RECOMMENDATION**  
**MEMORANDUM**

**DATE:** 8/30/06

**FROM:** Leo Francedense  
U.S. EPA Region 4  
On Scene Coordinator

**TO:** Jim McGuire  
Removal Operations Section  
Section Chief

**SUBJECT:** Camilla Wood Preserving Site, Camilla, Mitchell County, Georgia

**I. BACKGROUND**

On August 10, 2006 the EPA Region 4 Superfund Remedial and Technical Services Branch (SRTSB) referred the Camilla Wood Preserving Site to the Emergency Response and Removal Branch (ERRB) for a removal site evaluation. The Site is currently an NPL Site and has a long history of regulatory action including prior time-critical removals. While in the process of compiling a complete sampling database from several events assisted by Office of Research and Development and most recently the Emergency Response Team from 1998 to 2006, the SRTSB decided it was necessary to have the Site referred for removal site evaluation. That recently completed database demonstrates high concentrations at the surface as compared to the Region 9 Preliminary Remediation Goals (PRGs) assuming a conversion to 10-4 level of protection. Those PRGs have commonly been used as a baseline for removal action level (RALs) considerations. In this case the PRGs that were used as RALs trigger criteria were the 10-4 industrial based surface soils exposure goal of 21.0 ppm for carcinogenic polyaromatic hydrocarbons (CPAHs), and 900 ppm for pentachlorophenol (PCP). The limited offsite data was compared to the PRGs for 10-4 residential based surface soils exposure goal of 6.2 ppm for CPAHs and 300 ppm for PCP. Both onsite and offsite data were compared to the regional policy goal for 2,3,7,8 - tetrachlorodibenzo-p-dioxin (TCDD) of 20 ppb for industrial/recreational and 1 ppb for residential exposures to surface soil. All these goals are based on human exposure.

**II. REMOVAL SITE EVALUATION**

EPA ERRB conducted a review of the previous actions, site files and more pointedly, the recent database compilation for the Site. After review of the material, EPA ERRB determined that further sampling at this time is not necessary to make a determination.

A release of hazardous substances, creosote (risk evaluated as CPAHs), PCP, and TCDD (risk evaluated as TCDD toxicity equivalent quotients (TEQs)) has occurred from

the site and contaminated groundwater and surface soils have migrated beyond property boundaries. While the prior removals of process related wastes have significantly reduced the risks of migration from the Site to nearby residential communities and waters of the United States; levels that exceed the RALs exist. When evaluated based on current industrial land use and thus industrial exposure, CPAH RALs are exceeded with onsite values of 917.71, 51.41, 49.3, and 23.14 ppm. Offsite CPAH RALs are evaluated based on residential RALs and are exceeded with a value of 12.56 ppm in the limited data set. PCP is less of a driver, but triggers RALs for residential exposure with a value of 770 ppm in an unfenced section of the site. Offsite Dioxin TEQs exceed the regional residential policy criteria of 1 ppb with values of 10.8, 9.5, and 8.9 in an unfenced section of the site. PCP exceeds the maximum contaminant level (MCL) of 1 ppb in multiple intermediate aquifer wells with values ranging from single digits to 70 ppb. And finally, an oily sheen is observed when an up to 3 foot layer of sediments found in the southern bounding ditch are disturbed. Although limited data is available, that data exceeds both CPAH industrial and residential RALs with a value of 24.73 ppm.

### III. RECOMMENDATION

Pentachlorophenol, creosote and associated compounds such as benzo-a-pyrene, and TCDD are listed hazardous substances as defined by 40 CFR Section 302.4 (a) and pose a significant threat to public health. The threat comes primarily from potential exposure of nearby human populations to these hazardous substances. Direct contact and ingestion of these hazardous substances are the primary pathways of exposure.

Site conditions meet the requirements for initiating a time-critical removal action according to criteria listed in Section 300.415 (b)(2) of the NCP:

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

Hazardous substances exist on and off the site at high enough concentrations to present potential exposure to a nearby residential community.

*(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;*

There is a potential for contamination of the Upper Floridian Aquifer. The subsurface pentachlorophenol plume is outside site boundaries and has impacted the intermediate aquifer.

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

Site soils have already migrated in the past and are at risk to migrate into residential areas in the future due to the vulnerability of flooding.

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

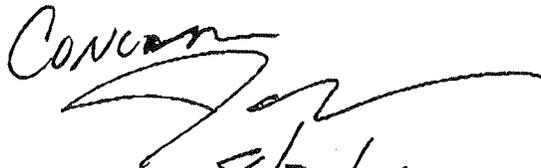
The vulnerability to flooding and the concurrent drainage associated with that feature make the site vulnerable to above normal precipitation events, such as a hurricane.

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

Given the potential size and scope of the action, State funds are insufficient. No other governmental entity currently has funds available to conduct the necessary removal activity in a timely manner.

Due to the threat and/or future threat to human health and the environment from hazardous substances at the Site, I recommend the Site receive a *high priority* for removal eligibility.

Concur  
8/31/06  


Concur  
  
8/30/06



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4WD-ERRB

SEP 07 2006

ACTION MEMORANDUM

DATE:

SUBJECT: Request for Approval of Action Memo, Including Exemption from the Twelve Month Statutory Limit and Two Million Dollar Ceiling at the Camilla Wood Preserving Site, Camilla, Mitchell County, Georgia

FROM: Leo Francendese, On-Scene Coordinator (OSC)  
Emergency Response and Removal Branch

THRU: Shane Hitchcock, Chief  
Emergency Response and Removal Branch

TO: Beverly H. Banister, Acting Director  
Waste Management Division  
Site ID # GAD08212409

I. PURPOSE

The purpose of this action memorandum is to request and document approval of a time critical removal action and exemption to the statutory two million dollar and twelve month time limits imposed by Section 104(c)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(c) (1), for the Camilla Wood Preserving (CWP) Site (Site), Camilla, Mitchell County, Georgia.

As a result of site conditions, immediate removal actions conducted pursuant to Section 104 of the CERCLA are needed at CWP. The total project ceiling, if approved, will be \$5,490,000, of which an estimated \$4,400,000 comes from the Regional Removal Allowance.

The purpose of the response actions proposed in this Action Memorandum is to provide prompt risk reduction through expedited action. The proposed removal response actions, together with potential remedial responses developed by the Supplemental Remedial Investigation, may provide a comprehensive response to environmental contamination at CWP. This Action Memorandum describes response actions to be implemented at the Site and includes a general strategy of

reducing risk by fencing where appropriate, excavating onsite zones of surface contamination, backfilling where appropriate, and evaluating disposal and/or onsite treatment options that are compatible with the targeted potential remedial sitewide responses whose development was assisted by the Office of Research and Development and the Emergency Response Team. In addition, the proposed removal response actions will include an evaluation of the current sitewide drainage ditch, including its contaminated sediments and its overflow system. And finally, a set of offsite data will be evaluated to determine possible removal actions. All these actions are meant to be consistent with the future land use development plan developed by the City of Camilla as part of an EPA Headquarters sponsored Land Reuse Development Grant. (Attachments 1, 2 and 3)

**II. SITE CONDITIONS AND BACKGROUND**

CERCLIS No:	GAD08212409
Response Authority:	CERCLA
NPL Status:	NPL Final
Time Critical Removal Action	

**A. Site Description**

The Louis Wood Preserving Company originally constructed the wood processing plant on what is now the site in 1947 on land that was previously a cypress swamp. Around 1950, Escambia Treating Company began operating at the Site. In 1985, through a series of corporate reorganizations and stock transfers, International Utility and Supply Corporation assumed control of the company and facility operations. The Escambia Treating Company retained the surface impoundments and their associated environmental management. At the time, the name of the operating company was changed to Camilla Wood Preserving, Inc. On February 8, 1991, Camilla Wood Preserving filed for bankruptcy protection, and on February 26, 1991, the facility closed. As of 2006, approximately 90% of the facility is fenced and the property is abandoned.

During more than 40 plus years of wood treating operations, the facility prepared trees for treatment by debarking, cutting to size, and drilling holes. Treatment consisted of using trams to load peeled poles into (2) pressure treating cylinders and then steaming the poles for 10 hours. A vacuum was then applied to the cylinders to remove water from the poles. Following the vacuum (dewatering) stage, approximately 25,000 gallons of treating solution were pumped into the treatment cylinders through aboveground pipes. The treating solution, either creosote or a solution of 10 % pentachlorophenol (PCP) in diesel fuel, was forced into the poles through pressurization. The poles were treated for a variable amount of time, depending on their moisture content. After treatment, the poles were moved to the drip pad area located in the vicinity of the railroad tracks and

then south towards the pole barns for further drying and storage prior to distribution.

Wastewater was generated throughout the process, in particular during the steam treating step (part of the dewatering step), preservative recovery, and the cleansing of drums, storage tanks, and the production area. Initially, the wastewater was collected in unlined impoundments located in the northeastern portion of the Site. Later, waste streams were treated in an onsite wastewater treatment system, before being discharged to the City of Camilla's water treatment plant.

In the 1960s, onsite drainage was altered to channel surface water runoff and, in some cases facility wastewater to (2) drainage (injection) wells located in the south-central portion of the property. These wells, which likely drained into the Upper Floridian Aquifer, were ordered sealed by the State Water Resources Control Board in October 1966. The drainage wells were reportedly plugged in 1971.

### **1. Removal Site Evaluation**

Region 4's Superfund Remedial and Technical Services Branch made a formal request on August 10, 2006 to the Region's Emergency Response and Removal Branch (ERRB) to perform the Removal Site Evaluation (RSE) for the Site. The RSE was completed on August 21, 2006.

The RSE focuses on surface soil/sediment contaminant zones. (*Attachment 4*) Additional samples were not necessary at this time because the EPA project manager relied upon data recently compiled from investigations conducted from 1998 thru present. These investigations were completed as part of the Remedial Investigation.

Queries of the onsite data, when compared to Region 9 Preliminary Remediation Goal's (PRGs), demonstrate significant zones of contamination that exceed the 10-4 risk based human health industrial criteria for direct contact to surface soils. These criteria are commonly used as removal action levels (RALs).

Carcinogenic polyaromatic hydrocarbons (CPAHs), which are derived from toxicity equivalent quotients (TEQs) adding toxicity equivalent factors (TEFs) as compared to benzo-a-pyrene, regularly exceed the 10-4 industrial risk-based human health criteria for direct contact to surface soils of 21 parts per million (ppm). (*Attachment 5*) The highest recorded onsite concentration of 917.71 ppm is more than 40 times the 21 ppm criteria and exists in the northeastern section of the Site, known as the Former Camilla Drum Zone. (*Attachment 6*) In the Former Drip Track Zone, CPAH concentrations commonly exceed the 10-5 industrial

exposure PRG of 2.1 ppm and the data demonstrate a relatively large area (approximately 10 acres or 25% of CWP) resulting in a large mass of contaminated surface soils. These soils are adjacent to a nearby residential community, which is part of the City of Camilla, and if mobilized because of flooding, present the potential for a residential exposure to soils that exceed the 10-4 RAL for residential exposure to CPAHs (6.2 ppm). In addition, a smaller, approximately one (1) acre zone of RAL exceeding-CPAH concentrations exist to the south in the Former Pole Barn/Sawmill Zone. While 90% of the Site is fenced, the Former Camilla Drum Zone is not. Observations of historical aerials indicate that the drip tracks/spur also passed through the Former Camilla Drum Zone and the CPAH RAL for both industrial (21 ppm) and residential (6.2) exposures are exceeded. (*Attachment 6, 7 and 8*) An additional area of direct contact concern is the approximately 1800 feet by an average 20 feet wide drainage ditch that exists along the site's southern borders. This area is known as the Former Drainage Ditch Zone. While a visible sheen is demonstrated upon disturbance, limited data is available for this ditch. One query for sediments CPAHs demonstrate a level of 24.7 ppm at the 2-foot level with no data for the 0 to 1 foot surface interval. (*Attachment 9*) Covering approximately 2.5 acres, the ditch is estimated to contain a 3-foot layer of sediments above a clay layer, with an estimated volume of 4000 cubic yards. While sediments are not normally considered when evaluating human health direct contact criteria, the Site is vulnerable to flooding. The large volume of potentially contaminated sediments presents a relatively large mass that could create a significant hazardous substances release if flooding were to take place.

Onsite PCP concentrations also exceed the Region 9 PRG 10-4 residential risk based human health criteria for direct contact to surface soils of 300 ppm, but only in one location out of a large database with a result of 770 ppm, over twice the RAL. (*Attachment 10 and 11*)

The Former Drip Tracks Zone, the Former Camilla Drum Zone, the southwestern corner of the Former Pole Barn/Sawmill Zone and the Former Drainage Ditch Zone together make up approximately 30% of the Site's surface area that either exceed the industrial or residential 10-4 PRG criteria and thus RALs.

Queries of the offsite data, when compared to Region 9's PRG's demonstrate several locations that exceed the 10-4 residential risk based human health criteria for direct contact to surface soils for CPAHs as well as regional policy for 2,3,7,8 - tetrachlorodibenzo-p-dioxin (TCDD) TEQs.

The CPAHs criterion of 6.2 ppm is exceeded in two (2) offsite locations in residential zones. These samples are described as follows, one (1) to the

northwest, across from the facility, and one (1) to the southwest across from the facility fenceline. (*Attachment 12*) The highest concentration of these four (4) values is 12.56 ppm or approximately 2 times the criterion. (*Attachment 6*) In addition, the southwest corner's CPAH values are collocated with TCDD TEQs that exceed the regional policy criteria value of 1 ppb for residential exposure. These values are 10.8 ppb and 9.5 ppb or approximately 10 times the 1 ppb criteria. (*Attachment 13*) A closer look at the TCDD TEQ distribution onsite demonstrates that while TCDD TEQs are present, they are far below the 20 ppb regional policy industrial criteria, although occasionally above the 1 ppb residential criteria.

And finally, the maximum contaminant level (MCL) for PCP of 1 ppb is exceeded in multiple intermediate aquifer wells, with concentrations as high as 70 ppb. (*Attachment 14*)

## 2. Physical Location / 3. Site Characteristics

CWP is approximately 40 acres in size and is currently zoned industrial. CWP is located in the City of Camilla, in the southwestern corner of Georgia. Camilla is on Georgia State Route 19, and is about 60 miles from Tallahassee, Florida, the nearest large city. Camilla has a population of 5,669 people and is located within Mitchell County, which has a population of 23,932. The Site is bordered on the north by Bennett Street and on the east by Thomas Street, and abuts residential neighborhoods to both the north and west. The Site and the land to the east of the site is zoned industrial with several light industrial uses currently in existence. Adjacent to the Site on the east is an operating lumber mill, automobile repair center, and a Georgia Department of Transportation facility. Further to the south is a large parcel of land that is zoned residential but is not fully developed. To the east across the rail tracks is a high school football field and other community athletic fields. A number of structures remain on the site. These structures are primarily large pole barns on the southern portion of the site with two small office buildings located at the northernmost end of the property. A small creek runs along both the western and southern edges of the Site, carrying water into a retention pond at the southwest corner just outside the Site (approx. 2.75 acres in size) which then continues to flow into part of the city's watershed/stormwater management system and ultimately in the Flint River, 8 miles away. The City of Camilla has completed an EPA Headquarters sponsored land use evaluation which proposes a light industry/recreational land use for the Site. The plan includes a community park, fire and rescue training facility, and recreational vehicle park. (*Attachments 1, 2 and 3*)

According to the City's Utilities Director, all residents in the immediate Site vicinity are supplied by the municipal water supply. The City of Camilla operates four (4) municipal wells to provide water to residents and businesses in the Site vicinity. Two of the wells, the Industrial Boulevard Well (Well Number 1) and the Fuller Street Well (Well Number 2), are located approximately 0.25 miles northeast and 0.5 mile west of the Site, respectively. Both wells are located in the upper Floridian Aquifer which flows toward the southeast. The Industrial Boulevard Well is the city's main source of water and the Fuller Street Well is used for as needed blending. According to the City's Utilities Director, the nearest private wells are approximately one (1) mile to the southeast in the vicinity of Goodson Road. The water table for the surficial aquifer ranges between (one) 1 and (five) 5 feet and generally flows in a southwesterly direction in the eastern portion of the Site, with a southerly direction elsewhere on the Site. This uppermost hydrologic unit is best described as a poor aquifer and better confining bed.

#### **4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant**

A release of hazardous substances, creosote (risk evaluated as carcinogenic polyaromatic hydrocarbons or (CPAHs), pentachlorophenol (PCP), and 2,3,7,8 - tetrachlorodibenzo-p-dioxin (TCDD) (risk evaluated as TCDD toxicity equivalent quotients (TEQs) has occurred from the Site and contaminated groundwater and surface soils have migrated beyond property boundaries. While the prior removals of process-related wastes have significantly reduced the risks of migration from the Site to nearby residential communities and waters of the United States, the remaining Site levels of surface soil contamination on up to 20% of the Site, pose a significant risk of continued migration as evidenced by offsite concentrations presented in the database. The concentrations of these releases exceed RALs and may pose a threat to public health. The potential for continued release of these soils over time is evidenced by the large areas of the Site that exceed the RALs, especially for CPAHs, and the potential for flooding that exists of this historically cypress swamp terrain to residential areas.

The Former Camilla Drum Zone is not fenced. High concentrations of CPAHs and PCP that exceed RALs exist in the surface soils, but only in one location. This combination of ease of access and contaminant levels may pose a threat to public health.

The Former Drainage Ditch Zone has limited analytical information, but available data demonstrates the probability that sections of the sediments are contaminated above CPAHs RALs, produce an oily sheen and pose the potential for release to the neighboring community.

## 5. NPL Status

The NPL listing for the Site was finalized on July 28, 1998. Removal actions will be consistent with the leading remedial long term options for action. With the use of phased Supplemental Remedial Investigations, the EPA has been able to more realistically target remedies for the Site. The Remedial Program is tentatively scheduled to complete the final phase of RI investigations that will be used primarily to bound the outskirts of the Site's PCP groundwater plume. This should be accomplished in early 2007.

## 6. Maps, Pictures and Other Graphic Representation

The following attachments are included in the Action Memorandum:

1. Site Location
2. Superfund Redevelopment Initiative Pilot Project "Reuse and Revitalization at the Camilla Wood Preserving Company Site Camilla, Georgia" April 2004
3. City of Camilla Proposed Land Use
4. Camilla Wood Preserving Site Zone Delineation
5. Surface Soil Industrial Average CPAH Concentrations  $10^{-4}$  1998-2004
6. Surface Soil Average CPAH Concentrations 1998-2004
7. Camilla Wood Preserving Operational Period Aerial 1970s
8. Surface Soil Residential Average CPAH Concentrations  $10^{-4}$  1998-2004
9. Sediment Industrial/Recreational Average CPAH Concentrations 2003
10. Surface Soil Residential Average PCP Concentrations  $10^{-4}$  1998-2004
11. Surface Soil Average PCP Concentrations 1998-2004
12. Surface Soil Residential Average CPAH Concentrations  $10^{-4}$  1998-2004
13. Surface and Subsurface Soil Dioxin Toxic Equivalent Values  $10^{-4}$  1998 and 2003
14. Intermediate Aquifer PCP Concentrations 1998 - 2004

Additional, as necessary, information will be made available by the OSC, and released to the EPA record center for inclusion in the Administrative Record.

## B. Other Actions to Date

### 1. Previous and Current Actions

In February 1980, the site was referred to the Georgia Environmental Protection Division (GaEPD), which performed a preliminary assessment in 1985. Following the assessment, the Site was declared a Treatment, Storage, and Disposal (TSD) facility subject to regulations of the Resource Conservation and Recovery Act (RCRA). Under the direction of the RCRA Waste Compliance Section, a compliance sampling event was conducted in March 1988. Elevated concentrations of RCRA listed wastes were found in the creosote recovery unit and ponds.

In early 1991, the Georgia Department of Natural Resources conducted a RCRA Facility Assessment, identifying 15 solid waste management units at the facility. These included drainage ditches to the impoundments, the drip track area (railroad line/spur), injection wells, the tank farm (aboveground storage tank area), the wood treatment area (former treatment area), sludge and water storage impoundments, and the wastewater treatment system. With the exception of the injection wells, all of these solid waste management units were located in the facility's northeastern portion.

In February 1991, after Camilla Wood Preserving's bankruptcy petition was filed, EPA's RCRA Branch referred the Site to EPA's ERRB. EPA's ERRB began removal actions in May 1991. The Site was secured with a fence along its perimeter and water from the storage impoundment was pumped into a storage tank at the Site's wastewater treatment area. The major removal activities undertaken by EPA from July 1991 through August 1995 included the following descriptions.

From July 18 through July 24, 1991, EPA led a preliminary, multimedia sampling survey at the Site to identify areas of gross contamination. The Site groundwater and various on-site soils were found to be contaminated with PCP and creosote. The groundwater data did not show contamination migrating beyond the site's boundaries.

On July 24, 1991, EPA directed stabilization efforts at the Site, which included repairing of the wastewater plant, treating contaminated on-site water, and discharging 50,000 gallons of water and sludge temporarily on-site in a former storage tank; staging drums and containers on-site for future removal; sampling contents of drums, backfilling the impoundment area with on-site soils, and constructing soil berms onsite to restrict Site runoff.

Between February 1992 and June 1992, EPA removal activities included the onsite treatment of 95,000 gallons of wastewater, the solidification of sludge in the impoundment, and the capping of the impoundment. In addition, the Bank of Fitzgerald removed equipment associated with debarking and chipping operations at the site.

In May 1994, EPA began to treat the standing water at the site and dismantle the process facility. EPA constructed an evaporation pond onsite and treated and discharged approximately 552,000 gallons to the new pond. EPA removed another 30,723 gallons of PCP and creosote from on-site tanks and shipped the hazardous material to the Chemwaste disposal facility in Port Arthur, Texas. EPA solidified the remaining tank sludges in the impoundment area and covered them with a clay cap. Processing facility and wastewater treatment equipment were dismantled, and the steel was cleaned and transported to a smelter in Birmingham, Alabama.

In October 1994, EPA collected soil samples to a depth of (one) 1 foot from neighboring properties, which included the Site parking lot, the easement along Bennett Street, and four (4) residential properties across Bennett Street. About 5000 cubic yards of soil were removed and stockpiled in a lined, bermed staging area on-site. The excavated areas were backfilled with clean fill. In August 1995, approximately 5000 tons of contaminated soil were shipped offsite for disposal.

In May, June, and July of 1997, the GaEPD conducted a Site Assessment to characterize soil and groundwater contamination in the northeastern portion of the Site. Both media results indicate elevated levels of wood treating compounds. On March 3, 1998, the Site was proposed for listing on the National Priorities List. On July 28, 1998 the proposed listing was finalized. The NPL site identification number is GAD08212409.

The initial phase of the Remedial Investigation was conducted from November 1997 through May 1999. Both groundwater and soil contaminant elevated results were dominated by PCP and creosote compounds. Because of data gaps and the resultant reliance on conservative assumptions, additional supplemental investigations were required in order to complete a realistic Feasibility Study. These supplemental investigations began in June of 2002 and are on-going. The final round of supplemental investigations is tentatively scheduled for fiscal year 2007. With the guidance of the EPA's Office of Research and Development and Emergency Response Team, the supplemental investigations were targeted at defining site specific parameters for subsurface confining layers, evaluating subsurface soil leachability, defining the surface soil/sediment contaminant zone definitization, and bounding of the groundwater PCP plume, which extends beyond property boundaries into the intermediate aquifer.

### **C. State and Local Authorities' Role**

#### **1. State and local actions to date**

The Ga EPD was notified of the proposed removal actions during a meeting at its Atlanta office on Tuesday, August 15, 2006 and with a followup memo on August 31, 2006. The Remedial Program includes ongoing communications with state officials. The Removal Program will continue to coordinate its action with the state's representatives, as well as with the Remedial Program at EPA.

## 2. Potential for continued State/local response

No State or local agency has indicated a capability to fund the necessary removal actions.

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

The ERRB has determined that a release of a hazardous substance into the environment has occurred at the Site, as the terms are defined in Section 101 of CERCLA and established under Section 102 of CERCLA at 40 CFR Part 302/Table 302.4. Conditions at the Site meet the following criteria listed from the NCP at 40 CFR 300.415(b)(2) for removal action:

#### A. Threats to Public Health

Section 300.415 (b)(2) of the NCP:

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

Hazardous substances exist on and off the site at high enough concentrations to present a risk of potential exposure to a nearby residential community and surrounding recreational land use.

(ii) *Actual or potential contamination of drinking water supplies or sensitive ecosystems;*

There is a potential for contamination of the Upper Floridian Aquifer. The subsurface PCP plume is outside site boundaries and has impacted the intermediate aquifer.

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

Up to 20% of the Site's surface soils exceed the 10-4 PRGs, primarily for CPAHs. Site soils have migrated in the past and could migrate into nearby residential areas in the future due to the possibility of flooding.

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

The Site was formerly a cypress swamp. The concurrent drainage associated with that feature makes the site vulnerable to above normal precipitation.

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

Given the potential size and scope of the action, State funds are insufficient. No other governmental entity currently has funds available to conduct the necessary removal activity in a timely manner.

### **B. Threats to the Environment**

Section 300.415 (b)(2) of the NCP:

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

Up to 20% of the Site surface soils exceed the 10-4 PRG, primarily for CPAHs. Site soils have migrated in the past and could migrate into nearby residential areas in the future due to the possibility of flooding.

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

The Site was formerly a cypress swamp. The concurrent drainage associated with that feature makes the Site vulnerable to above normal precipitation.

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

Given the potential size and scope of the action, State funds are insufficient. No other governmental entity currently has funds available to conduct the necessary removal activity in a timely manner.

### **III. ENDANGERMENT DETERMINATION**

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action outlined in this Action Memo, may present an imminent and substantial endangerment to public health, welfare, or the environment.

### **IV. EXEMPTION FROM STATUTORY LIMITS**

This Site presents a threat to public health, welfare and the environment which can currently only be mitigated through the completion of the removal action. Conditions at the Site meet the criteria listed in CERCLA Section 104(c)(1)(i), (ii), and (iii) for an emergency exemption from the statutory limits of 12 months and \$2 million and are sufficient to warrant a removal action based upon those factors listed under Section 300.415(b)(2) of the NCP.

#### **A. Consistency Exemption**

##### **1. Continued response actions are otherwise appropriate and consistent with the remedial action to be taken:**

ERRB will coordinate all activities with the Remedial Program's ongoing Supplemental Remedial Investigation in order to ensure all removal actions are consistent with the targeted remedial alternatives to address soil and groundwater contamination throughout the Site. Although the Record of Decision (ROD) has not been finalized, the removal does not foreclose the targeted remedial actions. Any removal action taken will be appropriate because it will not create additional waste which will adversely affect the Site's potential for future development and in fact, is consistent with the City of Camilla's proposed land uses. A removal action is necessary to mitigate the present threat to human health and the environment posed by the Site by preventing further migration of contaminants and/or reducing the overall unacceptable exposure risk/toxicity at the Site.

## **VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Actions**

The proposed actions at the Site include the following:

1. Excavate and restore to one (1) foot in the western half of the Former Drip Track Zone to achieve a direct contact industrial and/or recreational exposure level for CPAHs between 10-4 and 10-6. Fencing will be required to separate the western half of the Site from the eastern half.
2. Excavation and restore to one (1) foot in the southwestern area of the Former Pole Barn/Sawmill Zone to achieve a direct contact industrial and/or recreational exposure level for CPAHs between 10-4 and 10-6.
3. Install fencing, correct drainage, and dispose or relocate the pressure vessel for the Former Camilla Drum Zone.

4. Evaluate the Former Drainage Ditch Zone sediments and overflow system, possibly resulting in excavation and dewatering of contaminated sediments with consequent drainage ditch restoration such as rip rapping.

5. Evaluation of the three (3) offsite surface soil exceedances for TCDD TEQs and CPAHs with possible excavation and restoration to a depth of up to two (2) feet.

Accumulated soils/sediments will be evaluated in accordance with RCRA waste determinations and evaluated for offsite disposal at appropriate facilities. Determinations will be made for the different zones of soils. The possibilities include either a listed waste, common with wood treaters or an unlisted waste, more commonly associated with characteristic testing.

At this time, based on preliminary discussions with Regional RCRA experts, it is anticipated that the soils from the western Former Drip Track Zones will be considered a listed waste (F032). The options for handling this soil that are consistent with the Remedial Program's intent to minimize long term unattended, capped stockpiles of contaminated soils, include offsite disposal at a Subtitle C Landfill if initial universal treatment standards (UTS) are met. If UTS are not met, other options will be considered. One option is a petition for a treatability variance under RCRA regulation 40 C.F.R. Section 268.44 (a)(2)(ii). This regulation provides that, "the Administrator may approve a variance from an applicable treatment standard if: For remediation waste only, treatment to the specified level or by the specified method is environmentally inappropriate because it would likely discourage aggressive remediation." If the UTS are not met under the toxicity characteristic leaching procedure (TCLP), the alternatives are cost prohibitive and would likely result in the undesirable consequence of leaving the materials either behind in a stockpile or in their current place. Thus the Site would be left in worse condition than if no action was taken on the contaminated soils. TCLP tests on the excavated F032 soils will be conducted as soon as possible to determine whether UTS will be met. Similar soils have resulted in nondetect results for a similar test meant to measure leachability of soils to groundwater. This is presumed to be a result of the aged nature of the contaminants in which more mobile fractions have already leached. This test is known as the synthetic precipitate leaching procedure (SPLP) and its results offer encouragement that the TCLP-measured UTS standards will be met upon excavation.

Fencing will be erected between the eastern and western areas of the Site. After the removal action in the western area is complete, it is expected that surface soil industrial and/or recreational exposure scenarios will fall between the acceptable 10-4 and 10-6 risk range. According to the

Supplemental Remedial Investigation, the western half of the Site has very minimal groundwater remediation required. The singularly small area in which surficial groundwater remediation is anticipated will likely be treated by future remedial actions with in-situ oxidation in which a site-specific treatability-determined dose of oxidizer will be injected into the surficial aquifer subsurface within a relatively minor area of the western Former Drip Track Zone. The fence will act as a dividing line between acceptable industrial and/or recreational exposure to surface soils on the west side and unacceptable on the east side. This action is consistent with the Supplemental Remedial Investigation's current findings, which indicate that the eastern zone has a large PCP plume that has penetrated the intermediate aquifer. The likely sources are the former process areas associated with the eastern zone, with the greatest contribution appearing to come from the Former Camilla Drum Zone. It currently appears that the most likely remedial action in the eastern zone is a combination of concrete capping, slurry wall, and in-situ oxidation for the intermediate aquifer contamination. The Supplemental Remedial Investigation tentatively plans to conclude its bounding of the plume in early 2007.

At this time, based on discussions with Regional RCRA experts, it is anticipated that the excavated soil from the southwestern area within the Former Pole Barn/Sawmill Zone will not be a listed waste. These soils will be tested according to the non-listed characteristic testing procedures as outlined in RCRA. It is probable that these soils will qualify for Subtitle D Landfill disposal.

The Former Camilla Drum Zone will require fencing around the area. This former process area is unfenced and has levels of surface soil contamination that exceed Region 9 PRGs for industrial, recreational and/or residential exposure. In addition to the fencing, the response action will direct potential surface drainage away from neighboring residents. It is probable that the abandoned pressure vessel on the property will be evaluated for debris/scrap and disposed of accordingly or relocated to the main facility area across the road.

The Former Drainage Ditch Zone has limited analytical information available. It is an approximately 1800 feet by an average of 20 feet wide drainage ditch that exists along the site's southern borders. While a visible sheen is demonstrated upon disturbance, limited data is available for this ditch. A query for CPAHs demonstrates a level of 24.7 ppm at the two (2) foot level with no data for the 0 to 1 foot surface interval. Covering approximately 2.5 acres, the ditch is estimated to contain a 3-foot layer of sediments above a clay layer with an estimated volume of 4000 cubic yards. While sediments are not normally considered in human health direct contact criteria evaluations, the Site is prone to flooding due to its origin as a cypress swamp. Therefore, the sediments, as well as the

existing Site soils, may be at risk for release and redeposition. The removal response will include additional sampling in the drainage ditch as well as excavation and restoration of sections that have high levels of contamination. It is anticipated that the drainage ditch soils will not be a listed waste, but instead will be evaluated and disposed of as a non-listed characteristic waste. Consideration will be given as to how to effectively separate sitewide drainage along an east-west functional objective, in order to minimize the potential soil erosion that might occur from the remaining contamination of the eastern surface of the Site. This remaining eastern zone surface contamination is anticipated to be remedied as part of the remedial actions of capping, installation of a slurry wall and in-situ oxidation.

Offsite and immediately adjacent to the Site are elevated concentrations of CPAHs and TCDD TEQs. The removal response will delineate these three (3) locations and take appropriate soil removal actions to a depth of two (2) feet if necessary.

## **2. Contribution to remedial performance**

The proposed actions, will, to the extent practicable, abate the immediate threats to human health and the environment posed by this Site. The proposed removal actions will not impede future remedial investigations or responses.

## **3. Description of alternative technologies**

At this time, it is uncertain whether alternative technologies may be utilized given the concentrations of the contaminants of concern. If alternative technologies are determined to be an onsite treatment option for the sediments and/or soils, they will be evaluated on a pilot treatability basis and incorporated where applicable.

## **4. EE/CA**

Since this is a time-critical removal action, an EE/CA is not required.

## **5. Applicable or relevant and appropriate requirements (ARARs)**

To the extent practicable, the proposed Removal Action will meet the substantive requirements of the following ARARs:

- RCRA Land Disposal Restrictions (40 CFR 268)
- RCRA Requirements for Identification, Management and Transportation of Hazardous Waste (40 CFR 261, 262, and 263)
- DOT Hazardous Materials Regulations (49 CFR 107 and 171-179)

- OSHA Health and Safety Requirements (49 CFR 1910 and 1926)
- Off-Site Rule for CERCLA actions (40 CFR Part 300.440)

The Removal Program met with GaEPD on August 15, 2006 and state ARARs were discussed. The program was notified by the state that they do not have state identified ARARs to impose on the Site. The Removal Program will send a written request for ARARs identification immediately after approval of the action memorandum.

## 6. Project Schedule

The removal actions proposed in this memorandum will be initiated within 90 days of approval of this removal action. The removal actions described in this action memorandum are expected to require longer than 12 months and may require as much as 24 months.

## B. Estimated Costs

The estimated project costs are summarized below:

### Extramural Costs:

#### Regional Allowance Costs:

Former Drip Track Zone (west area)	\$2,900,000
Former Camilla Drum Zone	\$ 50,000
Former Pole Barn/Sawmill Zone	\$ 300,000
Former Drainage Ditch Zone	\$1,000,000
Offsite Soils	\$ 150,000
<b>Total Regional Allowance Costs</b>	<b>\$4,400,000</b>

#### Other Extramural Costs Not Funded From the Regional Allowance:

START	\$ 200,000
Bureau of Land Reclamation	\$ 200,000
Extramural Contingency	\$ 490,000

**Total Extramural Costs** **\$5,290,000**

### Intramural Costs:

Direct Costs \$ 100,000

**Total Intramural Costs** **\$ 100,000**

**Total Project Ceiling** **\$5,490,000**

**VI. 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 and the environment. The worse-case scenario involves migration of the contaminated surface soils/sediments into nearby residential neighborhoods and adjacent waters of the United States.

**VII. OUTSTANDING POLICY ISSUES**

None

**VIII. ENFORCEMENT**

See Attachment A, Confidential Enforcement Addendum

**IX. RECOMMENDATION**

Conditions at the Site meet the criteria listed in 40 C.F.R. Section 300.415(b)(2) for a removal action and the CERCLA Section 104(c) emergency exemption from the 12-month and \$2 million limitations. I recommend your approval of the action memorandum to allow a removal response. The total project ceiling is \$ 5,490,000, of which an estimated \$ 4,400,000, will be funded from the regional removal allowance. You may indicate your approval or disapproval by signing below.

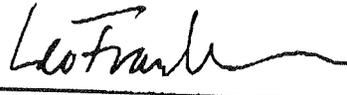
APPROVED: Beverly H. Banister DATE: 9/7/06

Beverly H. Banister, Acting Director  
Waste Management Division

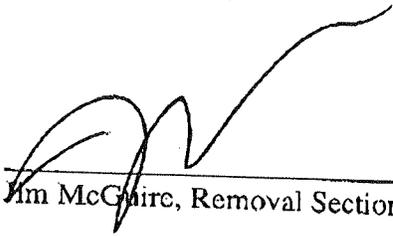
DISAPPROVED: \_\_\_\_\_ DATE: \_\_\_\_\_

Beverly H. Banister, Acting Director  
Waste Management Division

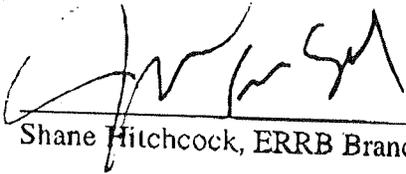
Signature page

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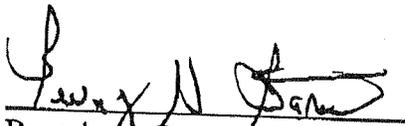
Leo Francendese, OSC



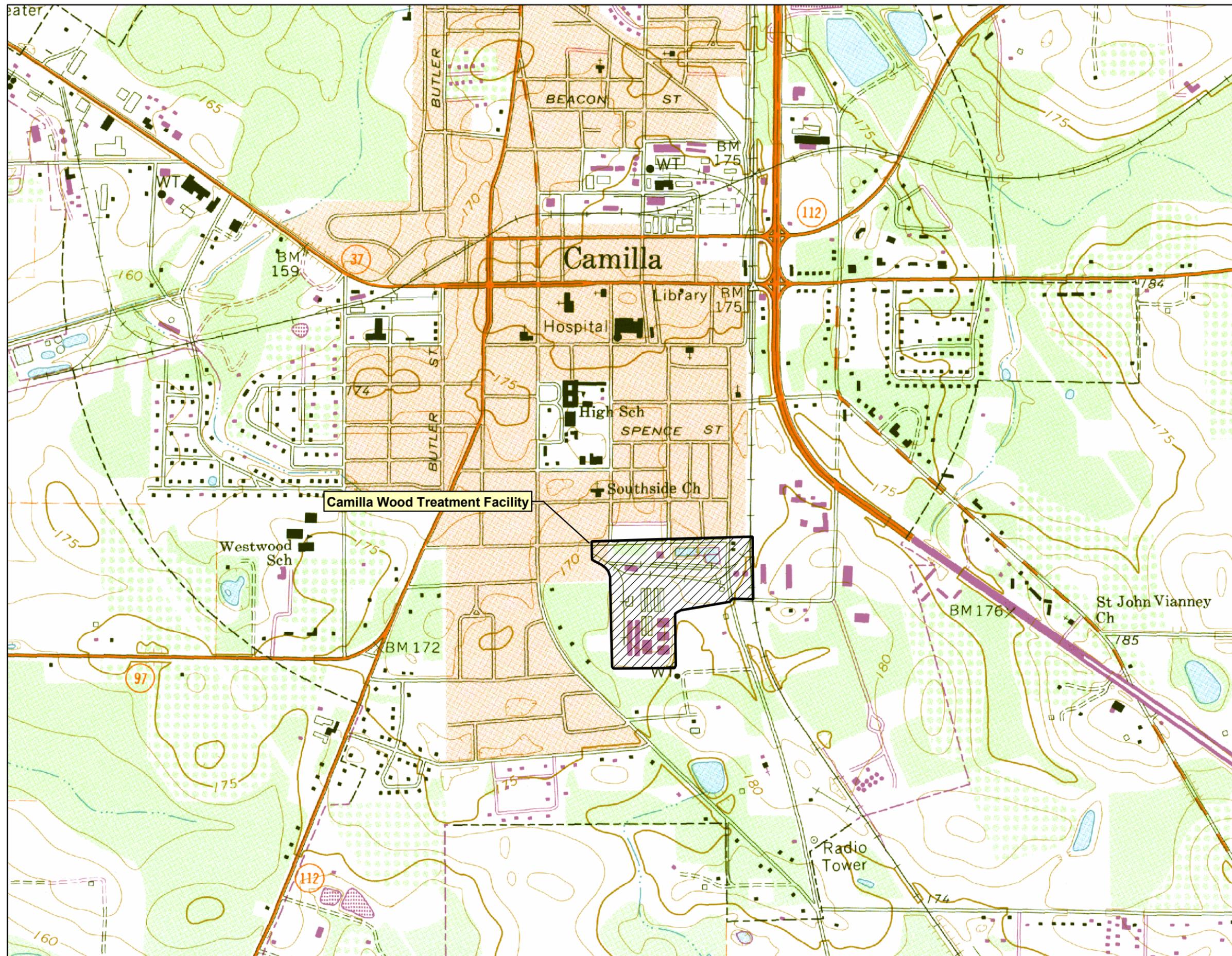
Jim McGuire, Removal Section Chief



Shane Hitchcock, ERRB Branch Chief

 9/7

Beverly G. Banister, Acting Director  
Waste Management Division



SOURCE: GPS LOCATIONS PROVIDED BY EPA.

**Legend**

 Site Boundary



0 250 500 1,000 1,500  
Feet



Camilla,  
Mitchell County,  
Georgia



United States Environmental Protection Agency

**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**  
TDD No: TTEMI-05-006-0002

**Figure 1  
Site Location**

 Tetra Tech, Inc.



Superfund Redevelopment  
Initiative Pilot Project

**Reuse and Revitalization at  
the Camilla Wood  
Preserving Company Site**  
Camilla, Georgia

Project Report  
April 2004

*Prepared for*  
The City of Camilla

*Project Team*  
E<sup>2</sup> Inc.  
D.I.R.T. studio

*Funded by*  
United States Environmental  
Protection Agency  
Superfund Redevelopment  
Initiative (SRI)



View of site along former drip track



View of remnant pole barns



View of debris southeast of the site



View of stormwater ditch south of site

## ***Introduction***

The U.S. Environmental Protection Agency (EPA)'s primary responsibility at Superfund sites is the protection of human health and the environment. Since 1995, it has also been EPA policy to consider reasonably anticipated future land uses when making remedy decisions at Superfund sites, so that the remediation of these sites can allow for safe reuse for commercial, recreational, ecological, or other purposes. Since 1999, EPA's Superfund Redevelopment Initiative (SRI) Pilot Program has been helping communities and stakeholders plan for reuse at more than 70 National Priorities List (NPL) sites across the country.

With forethought and planning, communities can collaborate with land owners, Potentially Responsible Parties (PRPs) and the EPA to help return sites to productive use without jeopardizing the effectiveness of the remedy developed to protect human health and the environment. Across the nation, more than 330 former NPL sites are in productive reuse or have plans for their reuse are under development. The commercial and industrial use of these sites supports 15,000 jobs and a half-a-billion dollars in annual incomes. Other sites are providing more than 60,000 acres for ecological and recreational uses.

Reuse planning at NPL sites presents a unique set of obstacles, challenges, and opportunities. Superfund site designation represents a commitment from EPA that a site's contamination will be remediated and that the site will be made safe for human health and the environment. However, reuse considerations at these sites can be complicated by several factors, including the level and complexity of contamination, the regulatory and liability scheme used to enforce site remedies, and unclear or resistant site ownership, which can lead to a lengthy and contentious remediation process. Any successful reuse planning effort must be mindful of how a site's reuse and remediation will work together, involve and expand the capacity of diverse stakeholders to meaningfully participate in the process, and take into account the long time frames often involved in NPL site remediation.

In 2002, the City of Camilla, Georgia, received a pilot grant from EPA's Superfund Redevelopment Initiative to undertake a community-based planning process to develop future land use recommendations for the 40-acre Camilla Wood Preserving Company NPL site. The City worked with the Project Team, environmental consultants E<sup>2</sup> Inc. (Ecology + Economics) and the industrial site architecture firm D.I.R.T. studio, to establish a community-based Land Use Committee (LUC), which managed the reuse planning process. This report presents the Committee's reuse recommendations and the conceptual site reuse strategy for the site. The contents of this report include:

- Executive Summary + Project History
- The Site + Its History
- Regional Context + Land Use
- The Land Use Committee
- Priorities for Future Use
- The Conceptual Reuse Framework
- Acknowledgments
- Report Appendices (included in a separate document)



The Camilla NPL site is approximately 40 acres in size and is currently zoned industrial. A heavily wooded area within the site's boundaries is considered uncontaminated.

## ***Executive Summary***

The City of Camilla Georgia, with funding from the US EPA's Superfund Redevelopment Initiative, undertook a six-month reuse planning process for the abandoned Camilla Wood Preserving Company Superfund site. This community-based process has resulted in a reuse strategy that is built around a community park with recreational opportunities, while integrating a regional fire and rescue training facility and a small RV facility.

The size and location of the Camilla Wood Preserving property provides a unique opportunity for the City of Camilla to build a large park that serves the entire city. While smaller parcels exist throughout the community for commercial, industrial, residential and civic uses, few other parcels in the City have the advantage of the site's size and central location. The local community would like to capitalize on this opportunity and work towards creating a park that occupies 20 of the site's 40 acres. The remainder of the site would be set aside for fire and rescue training, a small, short-term stay RV park, and enhancements to the area's storm water management.

The Project Team and a committee of local residents from Camilla worked closely with representatives from the US EPA and Georgia Department of Natural Resources to ensure that the site's reuse and remedy would work together. The committee sought site reuses that met the community's needs, maintained site safety, and would expedite a cost-effective remedy.

## ***Project History***

In the Spring of 2002, Camilla Fire Chief David Irwin, on behalf of the City of Camilla, Georgia, requested assistance from EPA's Superfund Redevelopment Initiative (SRI) in his effort to reuse the Camilla Wood Preserving Company Superfund site as a multi-agency public safety training facility. SRI responded to this request by contracting with environmental consultants E<sup>2</sup> Inc. and industrial site architects D.I.R.T. studio (the Project Team) to assist the community in developing a site reuse plan that would inform EPA about the reasonably anticipated future land uses for the site.

E<sup>2</sup> Inc. assisted the City of Camilla with the formation of a Land Use Committee (LUC) representing a broad cross section of stakeholders. Once the LUC was formed, the Project Team worked with the LUC via two working meetings and teleconferences to develop a conceptual site reuse framework and recommendations for the site's remediation phasing. The Project Team also worked closely with Leo Francendese, EPA's Remedial Project Manager for the site, to cross-reference reuse scenarios with possible remediation strategies.

E<sup>2</sup> Inc. presented a draft conceptual site reuse framework to the City Council on June 9<sup>th</sup>, 2003. After the City Council meeting, the framework was displayed at City Hall to allow adequate time for both City Council review and public comment. In the fall of 2003, a final conceptual site reuse strategy for the Camilla Wood Preserving Company Superfund site was completed.



During operation, lumber was brought to the site along Bennett Street. The lumber was then soaked in preservatives and pressure treated using creosote until the 1980s. Pentachlorophenol (PCP) was also used in combination with creosote beginning in the 1970s, and was used exclusively after the late 1980s. The pressure-treated wood was placed on railroad tracks and transferred to the pole barns to dry and remain in storage.

### ***The Camilla Wood Preserving Facility: Site History + Site Context***

The Louis Wood Preserving Company originally constructed the wood processing plant on what is now the NPL site in 1947. The plant was purchased by the Escambia Treating Company in 1950. Eventually, Camilla Wood Preserving Company took over the plant and most of the site, and all operations were discontinued in early 1991, when the company went bankrupt.

The Camilla NPL site consists of two parcels: a 39.1 acre parcel owned by the Camilla Wood Preserving Company and a 1-acre parcel owned by the Escambia Treating Company, the former site operator. Property taxes have not been paid on both properties in many years, providing the City with an easy acquisition opportunity.

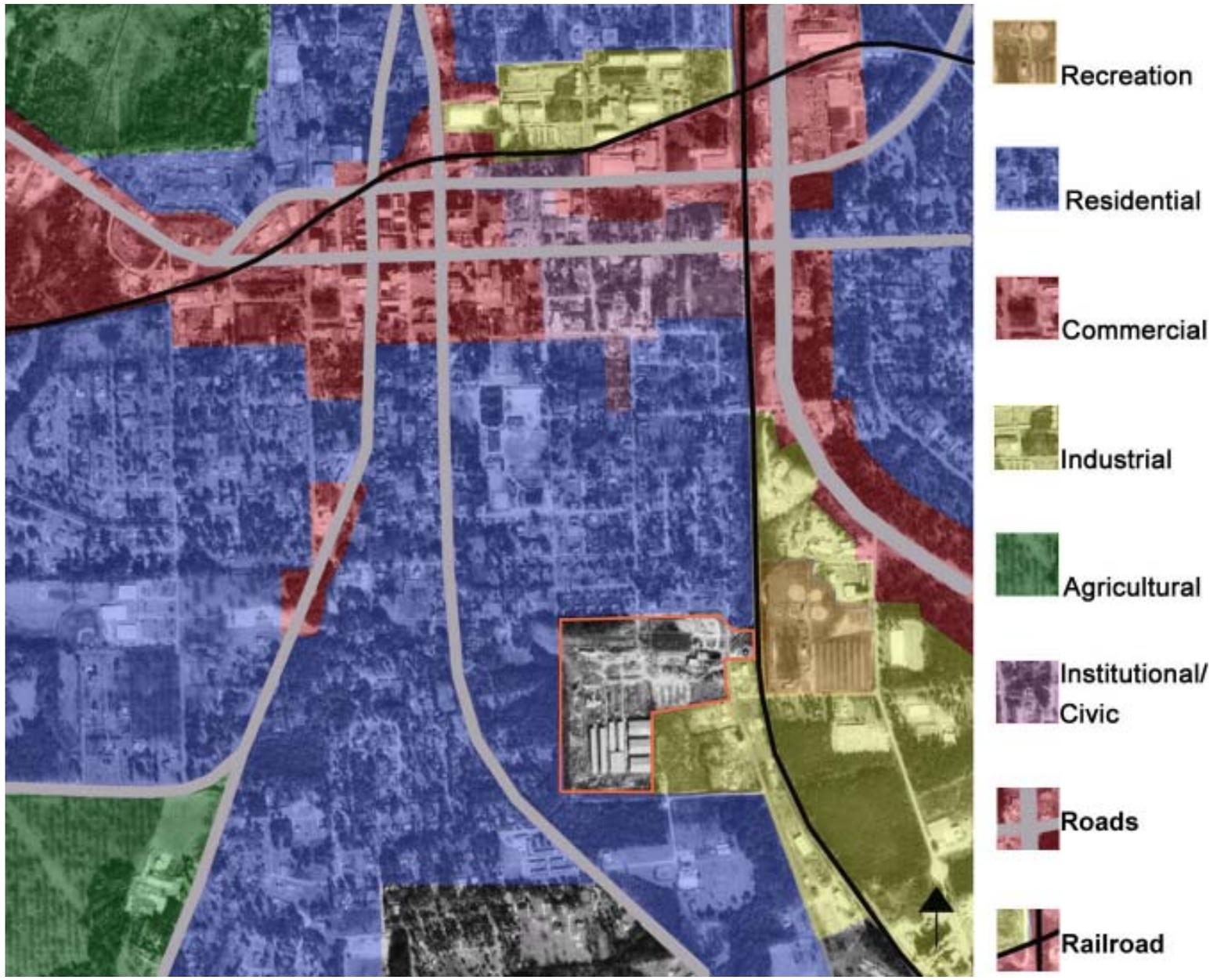
The site is bordered on the north by Bennett Street and on the east by Thomas Street, and abuts residential neighborhoods to both the north and west. The site and the land to the east of the site is zoned industrial with several light industrial uses currently in existence. Adjacent to the site on the east is an operating lumber mill, automobile repair center, and a Georgia Department of Transportation facility. Further to the south is a large parcel of land that is zoned residential but is not fully developed. To the east across the rail tracks is a high school football field and other community athletic fields.

A number of structures remain on the site. These structures are primarily large pole barns on the southern portion of the site with two small office buildings located at the northernmost end of the property. A small creek runs along both the western and southern edges of the site, carrying water into a retention pond at the southwest corner just outside the site (approx. 2.75 acres in size). Ground water at the site also runs in a southwesterly flow.

### ***Contamination + Remediation Status***

The site was listed on the NPL in 1998, following removal actions in 1991 and 1994. Elevated concentrations of polyaromatic hydrocarbons (PAHs) were detected in on-site soil (surface impoundments and waste piles) and in on-site ground water monitoring wells. Surface soils in the residential area north of the site were previously contaminated with anthracene, benzo(a)pyrene, naphthalene, pentachlorophenol, pyrene, and dioxins from the surface impoundment at the Camilla Wood Preserving Company site; this contamination was addressed by the earlier removals.

The site is currently in the Remedial Investigation and Feasibility Study (RI/FS) stage of EPA's pipeline of activities. While extensive sampling of the site soils, ground water, and surface water has been performed, the site's contamination was not fully delineated at the time this report was drafted. The draft RI/FS is scheduled for release at the end of 2004. Throughout the reuse planning process, the site's Remedial Project Manager kept the Land Use Committee and the Project Team informed regarding the most up-to-date information from the site's ongoing Remedial Investigation.



8 The site and surrounding land uses

## ***Regional Context + Land Use***

The Camilla Wood Preserving Company site is located in the City of Camilla, in the southwestern corner of Georgia. Camilla is on Georgia State Route 19, and is about 60 miles from Tallahassee, Florida, the nearest large city. Camilla has a population of 5,669 people, of which 65% are African American, and is located within Mitchell County, which has a population of 23,932. In 2000, the average income in Mitchell County was \$17,061, compared to \$21,154 in the State of Georgia. Land use near the Camilla Superfund site is shown on the adjacent diagram and is as follows:

### *Recreation*

The high school football field, as well as several other ball fields and a large parking lot, are located across the tracks east of the site. While other recreational areas are located within the City of Camilla, this area appears to receive a great deal of use, perhaps because of the large crowd draw of school football games and the ample parking available.

### *Residential*

The predominant land use surrounding the site is residential. Approximately 12 homes are within 25 yards of Bennett Street, directly across from the site. There are a few homes west of the site, although these homes are buffered from the site by a fairly dense woodlot.

### *Commercial + Civic*

There are no commercial areas in close proximity to the site. The areas of predominant commercial land use are in downtown Camilla, approximately ½ mile north of the site. Route 19, northeast of the site, has some small commercial facilities such as gas stations and convenience stores. Downtown Camilla is the location of the majority of local institutional and civic facilities, including City Hall and the Mitchell County Court House.

### *Industrial*

Due to the proximity of the site to the rail corridor, surrounding land uses are predominantly industrial, both small and large scale. Surrounding industrial uses include a lumber mill and an oil refinery. While a specific analysis was not undertaken as part of the project, several vacant industrial properties are available for development in the area to the east and south of the site.

### *Agricultural*

Although there is a modest amount of agricultural land within city limits, Camilla is surrounded by farmland, and has long been a center for the production and processing of peanuts, pecans, poultry, cattle, and cotton. Camilla serves as the county seat for Mitchell County, which ranks high among the state's counties in agricultural production.



## ***The Land Use Committee***

The Camilla Wood Preserving Company Superfund Redevelopment Initiative Pilot Project was established as a reuse planning process managed by a Land Use Committee (LUC), a seven-member body that met with the Project Team via teleconference and two meetings to develop a conceptual strategy for the site's next use. The City of Camilla served as the project's sponsor. The Project Team provided research, analysis, and design services, facilitated LUC meetings, identified potential resources, and developed a conceptual site framework and project report based on the LUC's reuse recommendations for the site.

The LUC structure was designed to ensure that the community-based group included a diverse range of interests and community characteristics including age, race/ethnicity, and economic level. Residents and property owners adjacent to the site, local business people, and local government officials were also sought out to participate in the Land Use Committee.

### *Committee Reuse Ideas*

The LUC worked with the Project Team during the project's first committee meeting to identify reuse opportunities and issues of potential concern. LUC members indicated strong interest in the reuse of the site for several purposes, including recreation, economic development, and community uses. The LUC identified neighborhood safety, economic development, and the compatibility of site reuses with surrounding land uses as issues of potential concern.

#### Recreational Reuse Suggestions:

¼ mile track  
Pedestrian trails  
Fit-trails (exercise stations on walking trail)  
Athletic fields  
Pool

#### Economic Development Suggestions:

Industrial warehousing  
Self-storage facility  
Multi-agency fire and rescue training facility  
Joint training facility and community facility  
RV and camper facility  
Retail stores

#### Community Development Suggestions:

Community center  
Picnic and playground area  
Open park space

**Site Context:** Top Left, clockwise - football field east of site; auto-repair shop on Thomas; rail corridor and industrial area southeast of site; home on Bennett Street.



**View of the pole barns.** Despite the location of a stormwater retention pond south of the site, the site itself has been known to flood during heavy storm events.

## ***Priorities for Future Use***

Throughout the design phase of the project, the Project Team and Land Use Committee spoke with the site Remedial Project Manager (RPM). The site RPM went to great lengths to inform and educate both the Team and the LUC regarding the site's contamination and proposed remediation and, as such, was an invaluable resource. It became a priority for all parties involved that the site's reuse be coordinated with the site remedy in an effort to streamline the remedial process, provide a forum for presenting alternative remedies, and work towards a common goal of reintegrating the site back into the community. Based on feedback from the Land Use Committee and discussions with the RPM, the Project Team developed a set of priorities for future use at the site, targeting specific areas of focus. These included:

### *Community Wide Site Re-Use*

Because the site is in such close proximity to residences, the creation of a community amenity that would serve the neighborhood *and* the City was identified as a top priority. Currently, the site is fenced, with decaying on-site structures, and is viewed as a community eyesore. The Committee's goal is to improve the site's appearance and create a resource for children and adults.

### *Economic Development*

The LUC initially stated a preference for a reuse that would bring economic benefit to the City of Camilla. Discussions focused on developing smaller parcels within the site boundary as light industrial facilities. After further deliberation, the LUC determined that the site neighborhood location made the site unsuitable for industrial uses and that industry would be best suited elsewhere. However, the possibility of locating a small RV park on the site was discussed and received wide approval by the LUC.

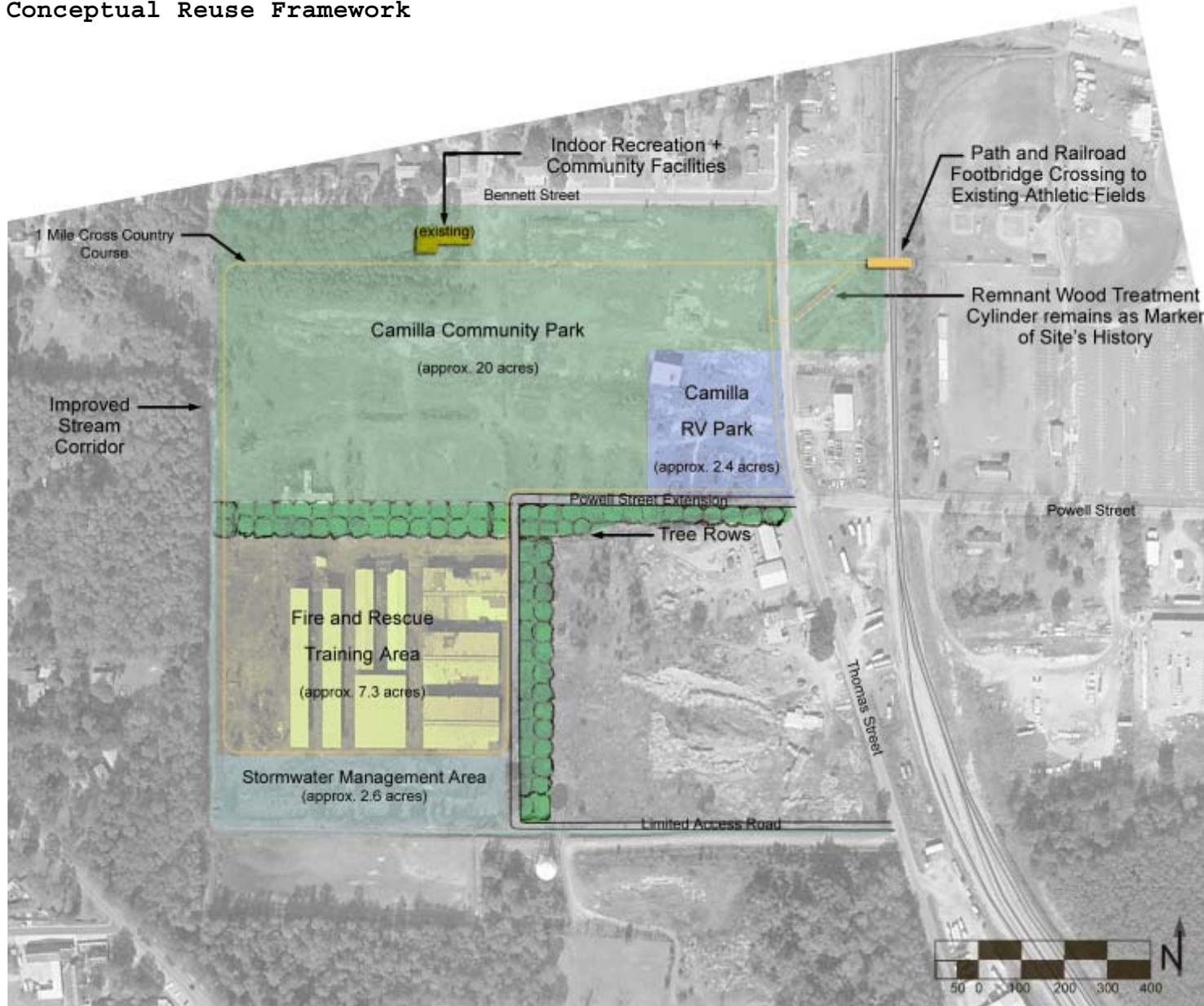
### *Ecology and Storm Water Management*

Because of the tendency for surface water to collect on site, effective storm water management was identified as an important component in the site's reuse. Additionally, the stream corridor, with its limited vegetation and narrow stream channel, could be significantly improved during the process of remediating and re-programming the site.

### *Safe and Speedy Remediation*

The LUC's first priority is that the site should be safe and that any site reuses should be appropriate for the community's needs. Beyond those concerns, the LUC indicated its support for reuses that would expedite the site's remediation. As such, the Committee sought to work with the Project Team and site Remedial Project Manager (RPM) to develop a reuse plan that would be consistent with an efficient, cost-effective, and expedient remedy for the site.

# Conceptual Reuse Framework



## ***The Conceptual Reuse Framework***

Reuse priorities discussed by the LUC and Project Team were translated into a Draft Conceptual Framework for Reuse, which was presented to the Camilla City Council in June 2003. The initial framework provided for a community park and fire and rescue training facility, as well as large parcels for future light industrial uses. After review by the City Council, however, the Land Use Committee decided that, due to the site's neighborhood location and substantial acreage, the most appropriate reuse of the site would be as a park serving the needs of Camilla's residents and visitors. Upon receipt of these comments, a Final Conceptual Reuse Framework was established, with the following components:

### *Camilla Community Park*

The Camilla Wood Preserving Superfund Site is located centrally within the City of Camilla and is surrounded by single-family residences. As such, the reuse of the site as a community park could serve to benefit both the adjacent neighborhoods as well as other city residents. Currently, the northwest portion of the site is heavily wooded and already creates a shady location that is ideally suited for passive activities and community gatherings. The new park could extend east and south from this area into an area of more active recreation, with amenities including a playground, basketball courts, volleyball courts, tennis courts, a community gathering area, or a running track. A portion of this community park could adjoin the proposed RV Park to provide an area for a pavilion or open area for fairs or a farmer's market or other temporary needs.

Across Thomas Street, an additional 1.6 acres would be available as additional community open space or recreational facilities. The remnant wood-treating cylinder that remains on site could serve as a historic landmark to tell the story of the site's history and transformation from an industrial site to a contaminated landscape, and finally, to a community park (an image of the cylinder is shown on the front cover of this report).

### *Recreation and Community Facilities*

The Camilla Parks and Recreation Department is currently in need of new facilities. If renovated, the existing office building near Bennett Street might be an ideal location for these new offices. A second building could eventually be built to house a new community center with indoor facilities including a larger space for gathering, an indoor pool, or a gym that would be serviced by the Parks and Recreation Department.

A cross-country trail with exercise stations around the circumference of the site could connect the site to the existing athletic fields east of the railroad tracks. This course could serve both the citizens of Camilla as well as trainees involved in the fire and rescue training program. A pedestrian footbridge over the railroad would assure safe crossing by individuals traveling from one area to the other.

### *Fire and Rescue Training Area*

The southwest portion of the site is an ideal location for a fire and rescue training area, as proposed by the Fire Chief of Camilla. Shielded by a line of trees to the north and east and wooded areas to the south and west, this location provides the maximum protection and isolation for the

activities associated with these facilities. The existing pole barns on site would be useful staging points for training purposes, although potentially the structures will be razed during remediation of this portion of the site. However, if the buildings are demolished, the materials could be salvaged and used to build the fire and rescue training facilities. Appendix A of this report provides information and resources for fire and rescue training facilities.

### *Stormwater Management Area*

As stated, the site's existing stormwater capacity is limited and often overloaded. Upon further study, it may be determined that a designated area of the site may be best suited for stormwater retention and management (possibly stormwater treatment wetlands). Near the fire and rescue training area, this parcel could serve as an added safety precaution and a wet barrier during training events. The stream corridors adjacent to the site could be improved with riparian plantings that would help to both slow down and filter pollutants as surface water enters the stream.

### *RV Park*

Initially, the LUC suggested a large RV facility to serve the needs of the community and tourists traveling to and through Camilla. After further deliberation, it was determined that the RV park would be best suited as a small component to the larger park. Ideally, there would be no more than 10 parking spaces, the design of which would blend into the layout of the larger park. In place of new industrial facilities, the RV park would serve to bring in a small amount of revenue to the City of Camilla. It would be located along Thomas Street to allow easy and safe access.

### *Rows of Trees and Bioswale*

The proposed rows of trees provide an essential framework for land uses and the remediation processes that will be ongoing over a significant duration of time. They also serve to define and separate the various parcels from adjacent uses and act as visual screening. Furthermore, the trees will provide for ecological diversification and a proposed bioswale will act as a filter for surface water runoff as water drains into the creek along the western and southern edges of the site. Students from local schools could be involved in planting and "dedicating" trees at the site.

### *Phasing*

In the creation of the Conceptual Reuse Framework, special attention was given to the edges of the site. These areas include the Camilla Community Park, the RV Park, and the tree rows. If it is possible to prioritize these areas first in the site's remediation they can more quickly be put into reuse and become valuable resources for the community. Ideally, the first step would be to remove the fence around the uncontaminated portion of the site (wooded area on northwest quadrant), which would provide for both visual and physical access and a nice gathering area or location for passive recreation. Prioritizing reuse of the edges will also serve to shield remedial activities that are ongoing. The creation of a crossing at the railroad and a trail through the park would represent significant progress towards connecting the site to the larger city.

## ***Acknowledgments***

The Project Team would like to thank the following people and organizations for their valuable contribution to this report:

### *Land Use Committee Members:*

Bryant Campbell	City Council - Land Use Committee Chair
Shan Daniels	Recreation Director for Camilla and Pelham
D.F. Irwin	Camilla Fire Chief
Marilyn Royal	Mitchell County Development Authority
Michael Scott	City Manager
Alice Shelton	Resident
James Shelton	Resident

### *Local Officials:*

Alfred J. Powell, Jr.	Mayor
Zelda Collier	City Council
Phillip Kelson	City Council
Oberia Mills	City Council
W.D. Palmer, III	City Council
Vernon Twitty, Jr	City Council
Michael Bankston	City Attorney

### *US EPA and Georgia Department of Natural Resources:*

Edward Bates	US EPA, Cincinnati
Jill Clark	Georgia Department of Natural Resources
Mark Fite	Regional Reuse Coordinator, US EPA Region IV

The Project Team would like to extend a special thank you to Leo Francendese, US EPA's Remedial Project Manager of the Camilla Wood Preserving Facility, and Karen Singer, US EPA Region IV Site Attorney.

For more information, contact:

**E<sup>2</sup> Inc.**  
2417 Northfield Road  
Charlottesville, VA 22901  
434.975.6700 - fax 434.975.6701  
[www.e2inc.com](http://www.e2inc.com)

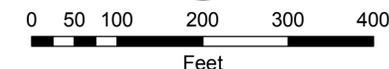




SOURCE: 1996 CAMILLA NW, GA DOQQ PROVIDED BY WWW.CHARTIFF.COM. LANDUSE AREAS PROVIDED BY THE CITY OF CAMILLA.

**Legend**

- Indoor Recreation and Community Facilities
- Path and Railroad Footbridge
- Tree Rows
- Camilla Community Park
- Camilla RV Park
- Fire and Rescue Training Area
- Improved Stream Corridor
- Stormwater Management Area



Camilla,  
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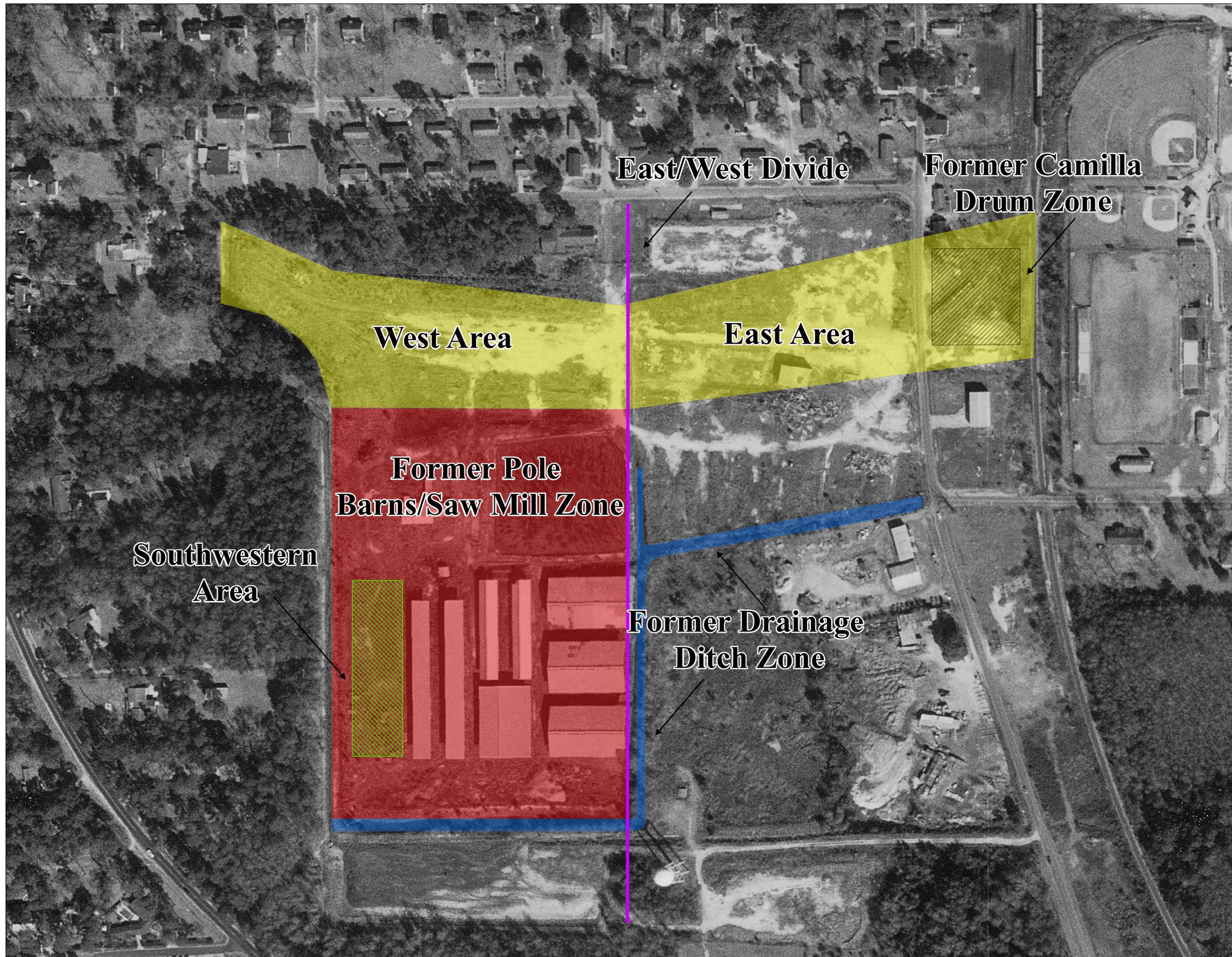


CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA  
TDD No: TTEMI-05-006-0002

City of Camilla  
Proposed  
Land Use



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**Legend**

-  East/West Divide
-  Former Camilla Drum Zone
-  Southwestern Area
-  Former Drainage Ditch Zone
-  Former Drip Track Zone
-  Former Pole Barns/Saw Mill Zone



Camilla,  
Mitchell County,  
Georgia



CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA  
TDD No: TTEMI-05-006-0002

**Figure 2**  
**Camilla Wood Preserving**  
**Site Zone Delineation**





**Legend**

**Average CPAH Concentrations: 10<sup>-4</sup>**

Less Than 10<sup>-4</sup> Region 9 PRG

○ 0.00 - 20.90

Greater Than 10<sup>-4</sup> Region 9 PRG

● 20.91 - 30.00

● 30.01 - 50.00

● 50.01 - 920.00



0 50 100 200 300 400  
Feet

Concentrations units are in mg/kg (ppm)



Camilla,  
Mitchell County,  
Georgia



**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**

TDD No: TTEMI-05-006-0002

**Surface Soil  
Industrial Average  
Carcinogenic Polycyclic  
Aromatic Hydrocarbons  
(CPAHs)  
Concentrations**

**10<sup>-4</sup>  
Between 1998 and 2004**





**Legend**

○ Sample Location



0 50 100 200 300  
Feet

Concentrations units are in mg/kg



Camilla,  
Mitchell County,  
Georgia



CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA  
TDD No: TTEMI-05-006-0002

**Surface Soil  
Average  
Carcinogenic Polycyclic  
Aromatic Hydrocarbons  
(CPAHs)  
Concentrations  
Between 1998 and 2004**





Camilla Wood Preserving Operational Period - 1970s



**Legend**

**Average CPAH Concentrations: 10<sup>-4</sup>**

Less Than 10<sup>-4</sup> Region 9 PRG

○ 0.00 - 6.19

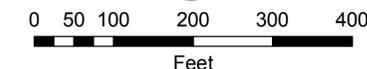
Greater Than 10<sup>-4</sup> Region 9 PRG

● 6.20 - 15.00

● 15.01 - 25.00

● 25.01 - 50.00

● 50.01 - 920.00



Concentrations units are in mg/kg



Camilla,  
Mitchell County,  
Georgia



United States Environmental Protection Agency

**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**

TDD No: TTEMI-05-006-0002

**Surface Soil  
Residential Average  
Carcinogenic Polycyclic  
Aromatic Hydrocarbons  
(CPAHs)**

**Concentrations  
10<sup>-4</sup>**

**Between 1998 and 2004**





**Legend**

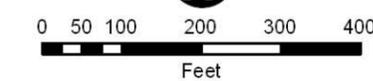
**TPAH Concentrations:**

Less Than 10<sup>-4</sup> Region 9 PRG

○ 0.650 - 44.999

Greater Than 10<sup>-4</sup> Region 9 PRG

● 45.000 - 460.000



Concentrations units are in mg/kg (ppm)



Camilla,  
Mitchell County,  
Georgia



CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA  
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**Sediment  
Total Polycyclic  
Aromatic Hydrocarbons  
(TPAH)  
Concentrations  
2003**



SOURCE: 1996 CAMILLA NW, GA DOQQ PROVIDED BY WWW.CHARTTIFF.COM. GPS LOCATIONS PROVIDED BY CDM AND REACT.

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**Legend**

**Average PCP Concentrations: 10<sup>-4</sup>**

Less Than 10<sup>-4</sup> Region 9 PRG

○ 0.00 - 299.99

Greater Than 10<sup>-4</sup> Region 9 PRG

● 300.00 - 770.00



Concentrations units are in mg/kg

Note: None of the samples collected were above the 10<sup>-4</sup> Industrial PRG of 900 ppm (mg/kg).



Camilla,  
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Georgia



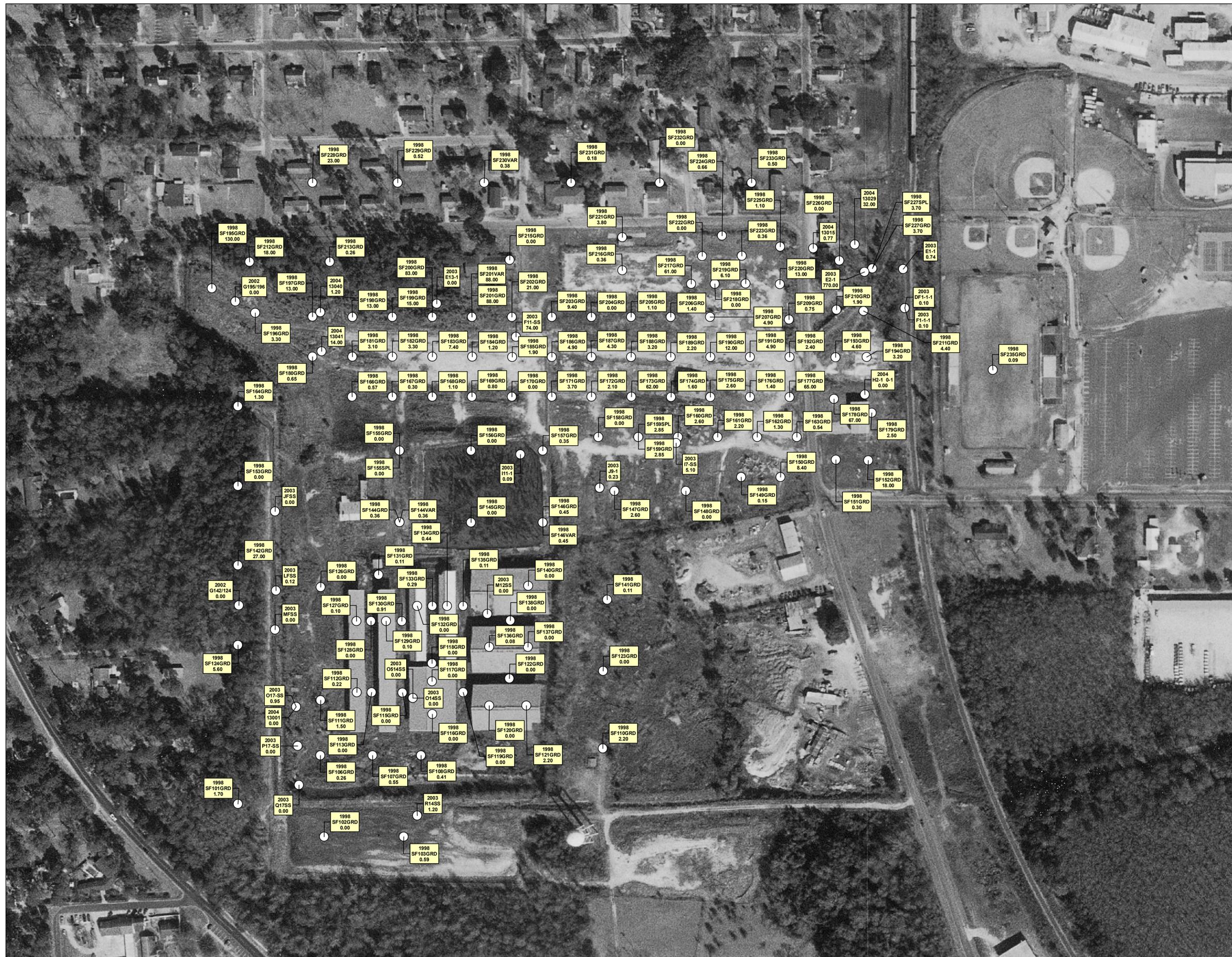
United States Environmental Protection Agency

**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**

TDD No: TTEMI-05-006-0002

**Surface Soil  
Residential and Industrial  
Average  
Pentachlorophenol (PCP)  
Concentrations  
10<sup>-4</sup>  
Between 1998 and 2004**





**Legend**

○ Sample Location



0 50 100 200 300 400  
Feet

Concentrations units are in mg/kg (ppm)



Camilla,  
Mitchell County,  
Georgia



United States Environmental Protection Agency

**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**  
TDD No: TTEMI-05-006-0002

**Surface Soil  
Average  
Pentachlorophenol (PCP)  
Concentrations  
Between 1998 and 2004**





**Legend**

**Average CPAH Concentrations: 10<sup>-4</sup>**

Less Than 10<sup>-4</sup> Region 9 PRG

○ 0.00 - 6.19

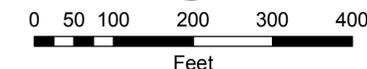
Greater Than 10<sup>-4</sup> Region 9 PRG

● 6.20 - 15.00

● 15.01 - 25.00

● 25.01 - 50.00

● 50.01 - 920.00



Concentrations units are in mg/kg



Camilla,  
Mitchell County,  
Georgia



United States Environmental Protection Agency

**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**

TDD No: TTEMI-05-006-0002

**Surface Soil  
Residential Average  
Carcinogenic Polycyclic  
Aromatic Hydrocarbons  
(CPAHs)**

**Concentrations  
10<sup>-4</sup>**

**Between 1998 and 2004**





### Legend

**Dioxin Toxic Equivalent (TEQ) Values in ppb based on the EPA's Residential Regional Policy Number of 1ppb.**

Less Than EPA Regional Policy Number

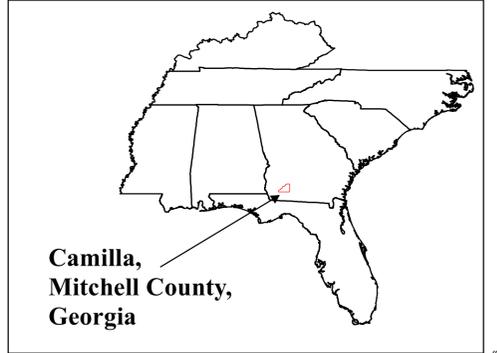
- 0.016 - 0.999

Greater Than EPA Regional Policy Number

- 1.000 - 2.500
- 2.501 - 5.000
- 5.001 - 8.000
- 8.001 - 11.000

0 50 100 200 300 400  
Feet

Note: The EPA Regional Policy Number for the Residential Toxic Equivalent (TEQ) is 1 part per billion (ppb) and 20 ppb for Industrial standards. None of the samples analyzed were above the Industrial standard.



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**CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA**

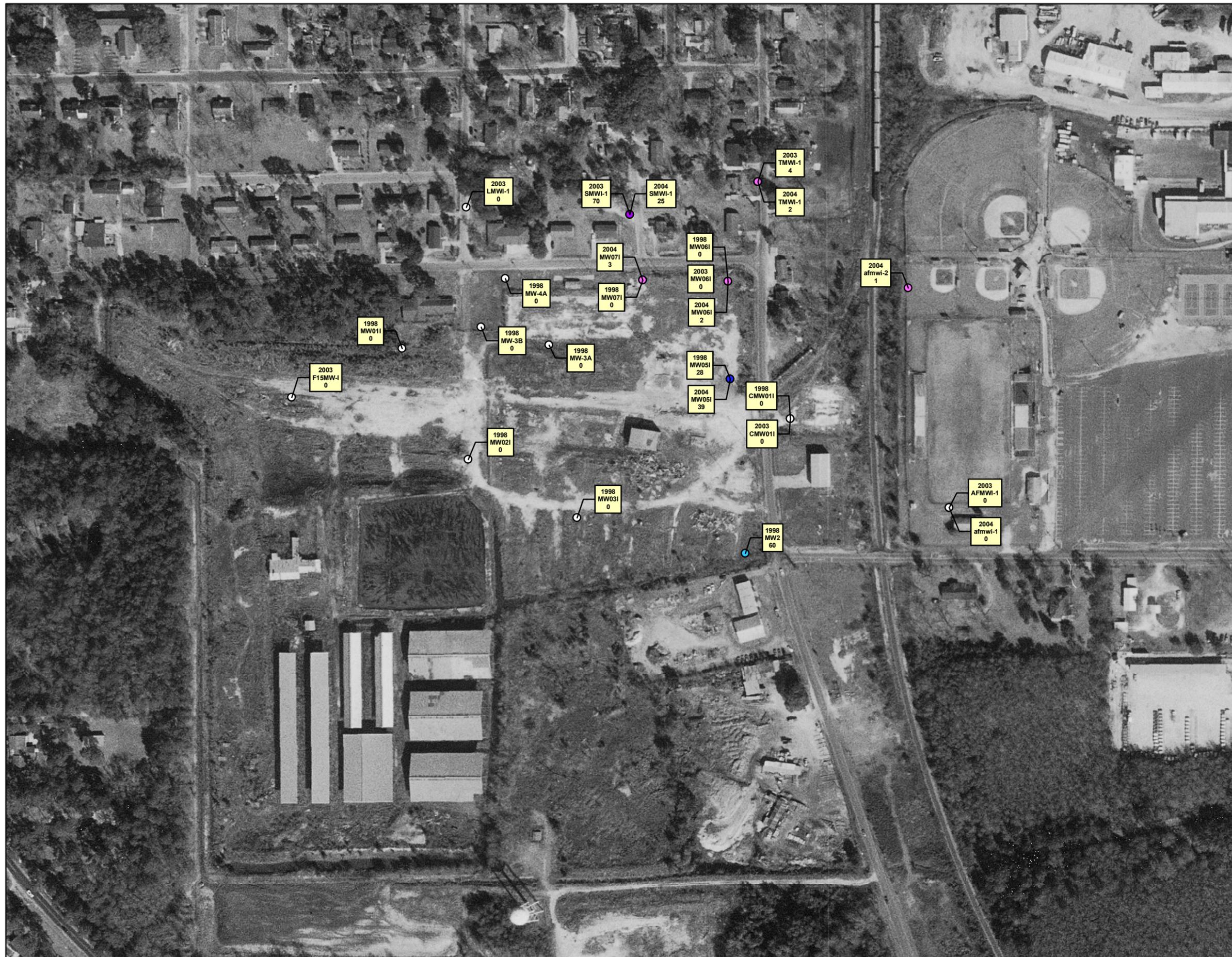
TDD No: TTEMI-05-006-0002

**Surface and Subsurface  
Soil Dioxin  
Toxic Equivalent Values  
(TEQs)  
1998 and 2003**

Tetra Tech, Inc.

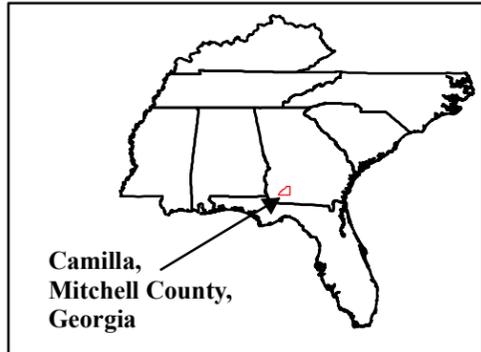
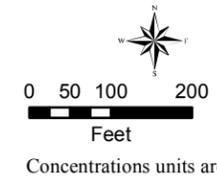
SOURCE: 1996 CAMILLA NW, GA DOQQ PROVIDED BY WWW.CHARTTIF.COM. GPS LOCATIONS PROVIDED BY CDM AND REACT.

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**Legend**  
Average PCP Concentrations

- 0.00 - 1.00
- 1.01 - 10.00
- 10.01 - 25.00
- 25.01 - 50.00
- 50.01 - 100.00
- 100.01 - 200.00
- 200.01 - 500.00
- 500.01 - 1000.00
- 1000.01 - 2000.00
- 2000.01 - 10000.00
- 10000.01 - 100000.00



CAMILLA WOOD PRESERVING  
CAMILLA, MITCHELL COUNTY,  
GEORGIA  
TDD No: 4T-05-09-B-10

**Intermediate Aquifer  
Average  
Pentachlorophenol (PCP)  
Concentrations  
Between 1998 and 2004**



SOURCE: 1996 CAMILLA NW, GA DOQQ PROVIDED BY WWW.CHARTTIFF.COM. GPS LOCATIONS PROVIDED BY CDM AND REACT.

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