

Site: Picayune

Break: 2.9

Other: V.1

**U.S. ENVIRONMENTAL PROTECTION AGENCY
\$200,000 EMERGENCY ACTION MEMORANDUM**

Date: October 21, 1999

Subject: **SPECIAL POLREP**
NOTIFICATION OF \$ 200,000 ACTIVATION
Picayune Wood Treating Inc. Site
Picayune, Pearl River County, Mississippi

From: 
Tony A. Best, OSC, Region IV

To: Regional Response Center, 4WD-ERRB
Jerry Banks, MDEQ
Dan Thornton, EPA-HQ Regional Coordinator

Site No: A4W2

Delivery Order No: 4009-F4-022

DO Amount: \$ 125,000

Contractor: IT Corp.

CERCLIS No: MSD065490930

ERNS NO: N/A

Response Authority: CERCLA

NPL Status: Non-NPL

State Notification: 10/21/99

Start Date: 10/21/99

I. INTRODUCTION

A removal site evaluation performed on 19-OCT-99 by On-Scene Coordinator (OSC) McAdams and representatives from the State of Mississippi, in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.410, has determined that there is a threat to public health or welfare or the environment posed by on-going and potential releases of contaminated waste water from the Picayune Wood Treating Site in Picayune, Pearl River County, Mississippi. Contaminated waste water from in-adequate, un-controlled and un-monitored above ground storage tank (AST) secondary containment areas, a leaking DOT highway transport tanker, an open top waste storage vat and overflowing drum/bucket/containers located throughout the site continues to be sources of off-site migration.

Pentachlorophenol (PCP) and creosote related contaminants from past facility operations are CERCLA Hazardous Substances. CERCLA contaminants, if released from the site, have the capability of presenting a potential hazard to the general public. Contaminated waste water from the site flows through a public park and residential area, adjacent to the site. Based on a review of the removal site evaluation, the OSC has determined that the site meets the criteria for initiating a Removal Action under Section 300.415 of the NCP. As a result of site conditions, immediate action pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), is needed.

Pursuant to Delegation 14-1-A, authority to obligate emergency CERCLA funding in the amount of \$200,000 to initiate removal/stabilization actions has been delegated to the OSC. The OSC has approved the use of CERCLA funding to mitigate the threat to public health, welfare and the environment at the Picayune Wood Treating Site.

II. BACKGROUND

ERT was notified on 21-OCT-99 regarding an on-going release at the Wood Treating Inc. facility in Picayune, Mississippi. The facility was initially referred to ERRL for assessment by EPA's Resource, Conservation and Recovery Act (RCRA) program. OSC McAdams conducted a removal assessment of the facility on 19-OCT-99. On 21-OCT-99, based on the completed removal assessment, OSC McAdams requested emergency response actions to stabilize the site from on-going releases. OSC Best (R1) was dispatched to the facility, accompanied by OSC McAdams.

Upon arrival, off-site migration of contaminated waste water, via on-site drainage ditches, was observed. Migration was occurring via the un-monitored/non-valved secondary containment around the northern above ground storage tank (AST) area, the deteriorated/structurally in-adequate secondary containment around the central operations AST area and non-existent secondary containment surrounding the pressure chamber treatment area. Based on the removal assessment, ERRL personnel were activated to initiate stabilization actions. START personnel documented the response.

III. THREAT

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. The selected criteria from paragraphs (b)(2) (i), (iii), (v) and (vii) directly apply as follows to the conditions at the Site:

- X 300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants"

Un-controlled releases of contaminated waste waters from the site, via drainage ditches, flow through an adjacent public park and residential area where children have access to potentially contaminated surface water and sediments.

- X 300.415 (b)(2)(iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release"

Un-controlled/un-monitored contaminated waste water in secondary containment areas with limited available free-board and non-containment areas surrounding ASTs, a leaking DOT highway transport tanker, an oil/water separator, an open-top AST, waste storage vats, pressure treatment chambers and overflowing drum/bucket/containers pose a threat of release.

- X 300.415 (b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"

Due to the limited available free-board in the un-controlled/un-monitored secondary containment areas, one significant rain event would cause contaminated waste water to be released from the site.

X 300.415 (b)(2)(vii) "The availability of other appropriate Federal or State response mechanisms to respond to the release"

The Mississippi DEQ has no response mechanisms/resources available to respond to the on-going and potential releases from the un-controlled/un-monitored facility in a timely manner.

IV. SCOPE OF WORK

With the \$200,000 emergency funding, the OSC proposes to properly dispose of contaminated waste water. The removal action consists of the following activities:

- removal of un-controlled/un-monitored contaminated waste water from the following:
 - AST secondary storage containment area,
 - AST/pressure treatment deteriorated/non-existent secondary containment area,
 - leaking DOT highway transport tanker,
 - oil/water separator
 - open-top AST
 - waste storage vats
 - overflowing drums/buckets/containers;
- the temporary storage of contaminated waste water removed, in frac tanks;
- the transportation and disposal of the contaminated waste water;
- the construction of a temporary secondary containment berm surrounding the entire central AST/pressure treatment area.

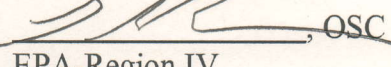
The authorized budget for this \$ 200K removal is:

EPA (Direct)	\$ 10,000
EPA (Indirect)	\$ 30,000
START	\$ 30,000
ERRS	\$ 125,000
Contingency	\$ 15,000
<u>TOTAL</u>	<u>\$ 200,000</u>

V. OSC ACTION

On 21-OCT-99, the OSC determined that a public health threat exists at the Site. The OSC activated \$200,000 to initiate a Removal Action to mitigate the threat to human health and the environment. The OSC issued a Delivery Order to initiate a Removal Action to mitigate the threat to human health and the environment.

Because the conditions at the Site meet the conditions set forth in Section 300.415 of the NCP for an immediate removal, the OSC has initiated funding of this Removal Action.


EPA-Region IV
Atlanta, GA