

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, September 3, 2009
From: Art Smith, On-Scene Coordinator

Subject: Initial Polrep for PRP-Lead Removal Action
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.:	14	Site #:	A4QP
Reporting Period:	08/17/2009 through 09/03/2009	D.O. #:	
Start Date:	8/17/2009	Response Authority:	CERCLA
Mob Date:	8/17/2009	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	KYD981473697	Contract #	
RCRIS ID #:			

Site Description

In February 2009, EPA and CSX Transportation, Inc. (CSXT) entered into an agreement where CSXT would perform the remaining removal activities under EPA oversight. CSXT is prepared a Removal Action Work Plan (RAP) to address remaining contamination at the Site where total arsenic exceeds 160 ppm in soil. Additionally, CSXT is required to mitigate off-site discharge of stormwater to an extent where acute water quality criteria for arsenic, chromium and copper are not exceeded. OSC Smith approved the RAP on 08/17/09.

(See POLREP Nos. 1-13 for details of EPA's Fund-Lead Removal Action for this Site).

Current Activities

CSXT and their contractors began the PRP-lead phase of the removal action on Aug. 17, 2009. Current operations involve removal of equipment and other material left on-site when Kentucky Wood Preserving abandoned the site in 2006, as well as the demolition of all existing structures. A more complete breakdown of work accomplished during the period from 08/17 through 09/02 is as follows:

- Office and breakroom trailer setup and connection
- Removal of power lines, transformers, guy wires, poles, and the gas meter
- Construction of the decontamination pad for equipment cleaning
- Document recovery and consolidation from the storage containers
- Removal of office equipment from one storage container and preparation for disposal
- Removal of fluids from and decontamination of forklifts and tractors
- Removal and decontamination of scrap, tools, and miscellaneous loose materials from the maintenance building
- Mobilization of demolition equipment to site
- Cleanout and demolition of the maintenance building and · Removal and decon of sawmill/wood processing equipment from the open shed,
- Sent the decontaminated tractors and forklift for scraping/recycling
- Sent decontaminated metal scrap, tools, and hardware for recycling
- Sent non-metal material, scrap, office equipment for disposal
- Drained fluids from trucks, decontaminant, and prepare them for scraping/recycling
- Set up dust control water and storm water BMP for the demolition area
- Dismantled and decontaminated three pressure vessels.
- Demolished open shed in lower yard.
- Completed removal of debris and vegetation from around maintenance shed pad in preparation for soil

treatment.

- Installed silt fence in preparation for soil treatment.

On 09/03, CSXT contractor AST Environmental initiated a pilot test of the in-situ solidification process. The solidification process is intended to prevent leaching of arsenic into surface water and groundwater and eliminate the potential for off-site migration of contaminants. 2 areas were designated for the pilot test. About 200 cubic yards of soil were excavated in an area where arsenic concentrations averaged less than 1,000 ppm arsenic or chromium and were amended with an application of approximately 5% Portland cement by weight. A 2nd area where less than 100 cubic yards was excavated where arsenic and/or chromium were known to exceed 1,000 ppm. For this area, ferric sulfate solution at concentrations up to 10% by weight was applied in addition to Portland cement. Samples of the treated soils will be collected on 09/04 and submitted for TCLP analyses after a 3 day curing period.

Planned Removal Actions

Pending results of the pilot test, CSXT plans to treat all areas onsite where arsenic exceeds 160 parts per million, using in-situ solidification. Areas which are treated will be covered with layers of geotextile materials and crushed gravel

Next Steps

Following completion of on-site construction work, CSXT will apply for a restrictive covenant with KDEP to ensure that future land use is compatible with environmental conditions at the site.

Key Issues

KDEP considers arsenic-containing soils at concentrations above a regional average background level of 13.12 ppm to represent a threat to human health. Several properties adjacent to the site exhibit arsenic at concentrations exceeding 13.12 ppm. KDEP sent letters to neighborhood residents in September 2008, requesting permission to sample for arsenic in off-site areas. KDEP is currently in the process of evaluating XRF data collected in residential areas within close proximity to the KY Wood Site. KDEP's decision on whether to initiate a state-lead cleanup of areas near the KY Wood Site is pending review of the XRF data.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Hazardous (F-listed) soil and debris	1,099.16 tons		Wayne Disposal, Inc. Site No. 2 Landfill; Belleville, Michigan
Hazardous (F-listed) liquid	110 gallons		Michigan Disposal Waste Treatment Plant; Belleville, Michigan
Non-hazardous soil and debris	2,290.4 tons		Montgomery County Landfill; Jeffersonville, Kentucky
Hazardous (F-listed) liquid	66,657 gallons		Heritage Environmental Indianapolis, Indiana
Metal for Recycling	72.18 tons		Baker Iron and Metal Co, Inc. Lexington, Kentucky

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