United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, November 4, 2009
From: Carter Williamson, On-Scene Coordinator

To: Matt Taylor, USEPA R4 ERRB
Richard Ball, MS DEQ
Shelby Johnston, EPA

Subject: Southeastern Wood Preserving
Covington Drive and Hargon Street, Canton, MS
Latitude: 32.6181000
Longitude: -90.0161000

POLREP No.:	5	**Site #:**	041L
Reporting Period:	10/28/09 - 11/04/09	**D.O. #:**	0042
Start Date:	8/31/2009	**Response Authority:**	CERCLA
Mob Date:	8/26/2009	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	MSD000828558	**Contract #**	EP-S4-07-03
RCRIS ID #:			

Site Description

The Southeastern Wood Preserving Site is an abandoned wood preservation plant facility which operated from 1928 until it filed for bankruptcy in early 1979. The Site covers approximately 20 acres and is located in a predominantly commercial/residential area just east of downtown Canton, Madison County, Mississippi. Batchelor Creek and Illinois Central Gulf Railroad border the Site to the north. The railroad is no longer operational. The City of Canton's drinking water well field lies just south of the Site. An abandoned industrial area lies to the east and a residential area borders the Site to the west.

The production process involved debarking of the Southern Yellow Pine timbers and placing them in retort cylinders for drying and pressure treatment using creosote and pentachlorophenol as preservatives. Prior to 1977 and the Clean Water Act, the facility reportedly discharged approximately 50,000 gallons of wastewater directly into Batchelor Creek. In May of 1977, the company was hooked into the City of Canton sewage system. The wastewaters were to be pre-treated prior to discharge into the City lagoons. On several occasions the City ordered the facility to cease discharge due to failure to adequately treat the wastewaters.

Batchelor Creek flows through a City park approximately 1 mile downstream from the Site, passes through a residential area and then continues through downtown Canton before leading into the Big Black River approximately 10-12 miles downstream. There is evidence of fishing and recreational usage in the Big Black River.

The Site has a long history of EPA involvement. The Emergency Response and Removal Branch (ERRB) of the EPA initiated an emergency response in early 1986 in order to stabilize three unlined surface impoundments that were overflowing on-site. Each impoundment contained creosote sludge and waters. The response action consisted of pumping 30,000 gallons of water from flooded areas of the Site, treating it, and discharging it into Bachelor Creek. Subsequent to this response, it was evident that the Site would be referred to ERRB for a removal action.

The initial Action Memo was signed in May 1986. It requested that site activities be addressed and funded in two phases. The scope of the first phase consisted of excavating and stockpiling hazardous waste on-site. The contaminated soils and sludges in the vicinity of the former lagoons were stabilized with lime kiln dust, placed in a stockpile and fenced. The second phase of the action was to consist of on-site treatment or off-site disposal of the material, but this action was delayed for several years.

In 1988 the Soil Conservation Service (SCS) contacted EPA after observing oily waste leaching into the Creek from the Southeastern Wood Preserving Site. SCS had designed a soil erosion prevention plan that called for excavating and widening Bachelor Creek. Through an Interagency Agreement, SCS contributed $190,000 towards the excavation work. The Creek was widened according to Plan and a

geofabric liner was placed in the bed of the Creek. The bed and the banks were then covered with rip rap in order to prevent erosion.

An exemption from the twelve-month statutory limit and ceiling increase as approved in August of 1989 in order to address the second phase of the removal action. A composite sample from the waste pile indicated a PAH concentration of 5016 ppm and a phenol concentration of 62 ppm. The 8000 cubic yard on-site stockpile was to be treated through bioremediation landfarming techniques. A ceiling increase and $2 million exemption was approved in 1990 once proposals were received. The RCRA Land Ban treatment standards and air emission standards required a slurry phase treatment due to the health based risk associated with the Site's surrounding residential/commercial areas. The removal action required the treatment of the contaminated soil to the K001 waste code Land Disposal Requirements (LDR) standards. The contractor proposed to utilize a batch bioremediation process consisting of screening, mixing with water, slurrying in two parallel biological slurry reactors (BSRs), and final treatment and drying in a double lined land treatment unit (LTU).

In 1992 An Amendment to Removal Action Memoranda Requesting a Treatability Variance was approved. After several failed attempts to reach the K001 LDR Standards with the bioremediation technique, it became apparent that a treatability variance would be necessary. The clean-up levels for phenanthrene and pyrene were adjusted without compromising the goals of the Removal Action by maintaining concentration of total PAHs below 100 ppm.

On February 26, 2003, representatives from the EPA and the Mississippi Department of Environmental Quality (MDEQ) met at the Site for a reconnaissance. During the reconnaissance the non effective treated soil was observed. It was noted that the pile had sunken over the years and could possibly be leaking into Bachelor Creek.

On June 6, 2007 On-Scene Coordinator Hughes visited the Site to perform a Removal Site Evaluation after the Site was referred to the Branch from the MDEQ. The OSC met the State representative on-site in order to characterize the layout of the Site and address the needs to fully perform the Removal Site Evaluation. The temperature mobilized the creosote present in the bed of Bachelor Creek enabling observation of releases downstream. Please see the photos in the Images Section.

On September 18, 2007 OSCs Hughes and Negron met with representatives from EPA's Science and Ecosystem Support Division in order to perform several borings in the area between the stockpile, the former lagoon and the Creek. The stream invert adjacent to location A0 was surveyed and found to lay approximately 14 feet below ground surface at the borehole location. The stream has a mild gradient as it flows west and is estimated to drop less than 5 feet.

Starting on August 25, 2009, EPA and ERRS personnel mobilized to the Site. Site preparation started promptly on September 28 and continues. Initial site preparation consisted primarily of the construction of an access road leading into Bachelor creek and the construction of a temporary cell to stage contaminated soils and sediments excavated from the creek.
Other activities included the removal and segregation of rocks from the banks of Bachelor Creek and the establishment of a site office.

In an attempt to facilitate post removal restoration activities, the OSC met with personnel from the Us Department of Agriculture Soil Conservation Service to obtain drawings and contours from previous bank stabilization actions conducted by SCS

ERRS installed curtain and absorbent boom downstream of the excavation and constructed a dam to re-route water from flowing into the excavation zone. Water flow has been diverted by using 3-8 inch pumps from behind the dam around the excavation zone and discharged back into Bachelor creek downstream of the excavation area. Construction of 2,000 feet of 12" PVC piping to reroute water alongside the site was completed.

Current Activities
Site work has been severely impacted by adverse weather conditions and its impact on response equipment. Weather for this reporting period has improved and allowed ERRS crews to proceed with soil removal in the creek bed.

A dam that was constructed to hold back creek runoff was destroyed due to a severe rainstorm. Batchelor Creek was inundated with water and runoff from adjacent properties over the weekend. ERRB discussed the test trenching results with the Remedial Program and have decided to excavate an additional 5-6 of the bed of Batchelor Creek to adequately remove all creosote contaminated soils. These soils are being placed in a separate staging pile.

U.S. Coast Guard (Gulf Strike Team) are on-site to provide federal presence in the absence of the EPA FOSC. USCG personnel are being tasked to provide site safety, photo-documentation and assistance with Canton community involvement.

The remnants of an office building,weighing station/platform were removed as were two empty 1000 gallon tanks.

Planned Removal Actions

ERRB OSC Williamson is coordinating with the EPA Remedial Program and MSDEQ staff Richard Ball to discuss depth at which creosote is being found in the creek bottom. Initial estimates of 4 feet has been exceeded as creosote is being found at 6-9 feet below grade in the creek but above the yazoo clay level. Creosote also emanating out from ditch bank adjacent to the site. All of creek bed has been removed to the depth of 4 feet. An additional 5-6 feet of creek bed soils will be excavated to try and reach the clean Yazoo Clay layer. START has now been tasked to coordinate a sampling event at the site to sample the two soil stockpiles and the creekbed where ERRS crews have reached the Yazoo Clay layer.

Next Steps

Coordinate with EPA Remedial Program and MSDEQ to determine future excavation activities due to presence of creosote at greater depths than originally anticipated. Determination to be made by EPA and MSDEQ as to depth of excavation, placement and storage of creosote laden soil on site and future of long term removal actions/listing of the site on the NPL.

The EPA Community Involvement Coordinator, Linda Stark will visit the site the week of November 16th to assess past and present outreach and community efforts, develop the Community Relations Plan and to meet with MSDEQ public information staff. The CIC will also meet with the City Government and residential neighborhoods adjacent to the SE Wood Site.

Key Issues

Inclement weather's impact on site work

Removal of additional creekbed soils in Batchelor Creek to the clean Yazoo Clay layer.

Coordination with EPA Remedial Program to determine long-term clean-up of site and implications on current Time-Critical Removal Action being undertaken by ERRB.

Sampling of excavated soils to determine constituents in soils for future transfer and disposal options.

Question as to transfer of contaminated soils off-site or stockpiled and capped at the present location.

response.epa.gov/SoutheasternWood