

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Wednesday, March 3, 2010

From: Carter Williamson

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.:	11	Site #:	041L
Reporting Period:	02/17/10 - 02/28/10	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 waste-water 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 Batchelor 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 Batchelor 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. Excavation of Batchelor Creek began and continues at present. OSC Carter Williamson is directing all on-site activities with the assistance of the United States Coast Guard, Gulf Strike Team.

Current Activities

Approximately 30,000 cubic yards from Batchelor Creek have been stockpiled on-site and are awaiting a sampling event to occur the week of March 15, 2010.

Based on previous and anticipated precipitation in the Canton area, it was decided to delay installation of creekbed liner and rip rap until a more appropriate time when rainfall will not impact/destroy these institutional controls.

Approximately 1,800 feet of the 12 inch PVC has been cut up into 20 foot sections and a determination will be made as to the final disposition of this material. Sampling of a random number of the pipe sections may be scheduled at a date TBD.

The bentonite/portland cement silos, pits, baker tank and associated equipment to mix the slurry wall compound have arrived on-site and have been installed. Slurry wall construction has begun. Approximately 400 feet of slurry wall has been completed as of February 28th, 2010.

The final Community Relations Plan (CRP) was sent to OSC Williamson after several comment periods and will be placed in the Administrative Record.

OSC Steve Spurlin visited with OSC Williamson and site personnel to preview current activities. OSC Spurlin may be assuming the lead role at the site and will oversee the final sampling event, ceiling increase and final site prep.

*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, contractor cost summary review, photo-documentation and assistance with Canton community involvement.

Planned Removal Actions

Continue the construction of the slurry wall (approximately 1,300 feet in length.)

Conduct sampling event of the stockpile the week of March 15th to determine constituents in the soil for possible disposal.

Draft Action Memo ceiling increase to facilitate removal and final disposition of stockpile, to allow for placement of geo-fabric and rip-rap in Batchelor Creek during season with less precipitation and to grade, seed and prepare site for possible Remedial action if listed on the NPL.

Next Steps

Coordination between OSC Williamson and OSC Spurlin regarding the future of site activities. Tetra Tech staff will be visiting the site the week of March 15th to conduct in-depth sampling activities of the stockpile. WRS continues to oversee slurry wall construction and USCG personnel are assisting USEPA with site safety and federal presence. EPA Remedial staff are in contact with ERRB OSC's Williamson and Spurlin regarding the final assumption of the site.

OSC's Williamson and Spurlin will attempt another meeting with Canton Chamber of Commerce staff and Canton city government personnel during visit to site the week of March 15th, 2010 and will continue discussions with EPA Remedial Program regarding the long term remediation of the SE Wood Site.

Full-scale sampling of the stockpiles will take place the week of March 15-18 to determine disposal options. A Independent Government Cost Estimate (IGCE) will be generated to determine potential costs for disposal of this material and additional funding through a Action Memo ceiling increase will be required at some point in the near future.

Additional contingency funding has been allocated to the ERRS delivery order to bolster site funding to complete the project.

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Key Issues

Inclement weather's impact on site work

Repetitive breakdown of heavy equipment on site.

Unscheduled and scheduled releases of large volumes of waste water into Batchelor Creek which impacts site activities.

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

Coordination with MDEQ, the City of Canton and the EPA Remedial Program on the successful completion of this time-critical removal action.

Sample results of excavated soils to determine constituents in soils for future transfer and disposal options and to confirm degree of removed contamination in Batchelor Creek..

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

Determination on how to address opposing (Eastern) creek bank that has evidence of creosote contaminated soils present.

Increase in site ceiling to continue removal operations at site, specifically the disposal of the stockpile, completing the remedial action in Batchelor Creek and site contouring/seeding etc.

response.epa.gov/SoutheasternWood