

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Valley Post & Sawmill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: POLREP #2
POLREP #2
Valley Post & Sawmill
08RL
Sheridan, WY
Latitude: 44.7597000 Longitude: -107.0828000

To: John Irizarry, EPA Headquarters
From: Craig Myers, On-Scene Coordinator
Date: 7/20/2010
Reporting Period: 6/13/2010 through 7/6/2010

1. Introduction

1.1 Background

Site Number:	08RL	Contract Number:	
D.O. Number:		Action Memo Date:	5/12/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/24/2010	Start Date:	5/24/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

The Valley Post and Sawmill site (Site) is a former sawmill and wood treatment facility located along the south side of Big Goose Road approximately 2 miles south west of Sheridan, Sheridan County, Wyoming. The Valley Post and Sawmill treated wood using Pentachlorophenol (PCP) mixed with diesel fuel. It is unknown precisely when the facility commenced its wood treating operation; however, the state of Wyoming believes that it shut down sometime during 1996.

Carl Sayer owned and operated the Valley Post and Sawmill during the entire period of operation. PCP was mixed with diesel fuel in a small tank, after which, it was transferred to the retort tank/pressure vessel where the posts were treated. In addition to the retort vessel, there were also two smaller tanks that posts were dipped in to be treated. Treated posts were then stacked on bare soil to dry. There is no record of any containment features associated with Site operations, and the use of engineered containment features was not a standard practice in the industry prior to the mid to late 1980s.

The Wyoming Department of Environmental Quality (WDEQ) and EPA's Resource Conservation and Recovery Act (RCRA) programs conducted an inspection of the facility while it was in operation in 1987. The inspection documented areas of significant soil contamination and dumping of PCP laden solution directly to soil, however, at the time of the inspection, the F032 waste listing had not been promulgated, so no actions were taken. Results of this inspection are available in the Site file. There is no evidence that either EPA or DEQ followed up on this inspection.

In October of 2008, WDEQ responded to an inquiry about the facility from a prospective purchaser and conducted an inspection. This inspection identified that the tanks and equipment had been removed from the Site and that significant movement of soil had occurred recently. A cure notice was issued to the current property owner, Mr. Shane Taylor – Carl Sayer's nephew, to conduct an assessment of the property and to develop a clean up plan. Taylor was given 60 days to respond. WDEQ requested EPA's assistance for the Valley Post and Sawmill Site upon the expiration of the 60 day time period, on approximately May 15, 2009.

The Site is an inactive 25 acre sawmill and wood treating facility consisting of several areas of contaminated soil where wood treatment, dipping, and drying occurred. The Site has not been used for wood treatment since approximately 1996. The site also includes a parcel of property located in Guernsey, WY, where Mr. Taylor moved the aforementioned tanks.

1.1.2.1 Location

650 West Wheatland Ave, Guernsey, WY; and
446 Big Goose Road, Sheridan, WY

1.1.2.2 Description of Threat

PCP has been documented at the Site in concentrations exceeding 390 mg/kg, indicating that PCP has been released into the environment. Documents from the joint EPA/WDEQ inspection show very poor housekeeping during facility operations and support the Removal Site Evaluation findings of PCP in the soils on the Site.

PCP has been documented in concentrations exceeding 8,000 mg/kg in the tank at the Guernsey Property. This tank has also been documented to have existing holes, thus threatening a release of listed hazardous waste to the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Week of 6/14/2010

Excavation continued, as did treatment of the tanks. Waste was mixed with compost and placed into the treatment cell. Attempts were made to place the waste such that the cell had an even concentration of PCP. An additional drum was found during excavation on 6/14. It contained an oily material with a concentration of approximately 2,900 ppm PCP.

Week of 6/21/2010

Excavation continued during the early part of the week, as did treatment of the tanks. Samples of the tank rinse showed that the tanks should be clean. Samples were submitted to a commercial lab for dioxin analysis. The treatment cell was tilled to better homogenize the soils prior to inoculation with the bacteria. The cell was inoculated on 6/23/2010. The cell was tilled and watered daily on the 24th and 25th, and the contractor demobilized on the 26th.

June 26th, 2010 through July 6th, 2010

The cell has been tilled and watered bi-weekly during this time. Routine operations have been transitioned to a sub-contractor who has installed a watering system and will conduct the bi-weekly tilling of the cell.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Intentionally Left Blank - Enforcement Sensitive.

2.1.4 Progress Metrics

All soil is being treated on site at this time. Steel from the tanks is currently staged on site awaiting approval from the State of Colorado for disposal as F032 waste.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Debris	Solid	3.68 tons	N/A	None	Non-Hazardous

2.2 Planning Section

2.2.1 Anticipated Activities

Routine maintenance of the cell will continue. Samples will be taken and analyzed for PCP as well as biological analysis to determine efficacy of the treatment.

2.2.1.1 Planned Response Activities

None.

2.2.1.2 Next Steps

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2.2.2 Issues

None.

2.3 Logistics Section

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2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$148,039.00	\$51,961.00	25.98%
TAT/START	\$65,000.00	\$36,948.00	\$28,052.00	43.16%
Intramural Costs				
Total Site Costs	\$265,000.00	\$184,987.00	\$80,013.00	30.19%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Intentionally Left Blank. This section does not apply to a removal action.

2.6 Liaison Officer

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2.7 Information Officer

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3. Participating Entities

3.1 Unified Command

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3.2 Cooperating Agencies

None.

4. Personnel On Site

None at this time. The ERRS sub contractor is mobilizing a crew of 2 personnel as needed to maintain the cell.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be found on-line at www.epaosc.net/ValleyPostSawmill or in the Site file in the EPA Region 8 Superfund Records Center.

6.2 Reporting Schedule

The next report will be made when the OSC deems it appropriate.

7. Situational Reference Materials

www.epaosc.net/ValleyPostandSawmill

POLREP #2 Last Updated 7/21/2010