

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, August 20, 2010

From: Steve Spurlin

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

POLREP No.:	15	Site #:	041L
Reporting Period:	8/16-8/20/10	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 and excavation of Bachelor Creek began.

Current Activities

WRS continued load out of soil stockpile material onto trucks for offsite transportation and disposal. An estimated 39,316 tons of soil stockpile has been loaded out and transported offsite for disposal as August 18, 2010.

WRS collected representative samples from two 55-gallon drums of waste oil and the reservoir oil in an electrical transformer staged on site for profile and disposal activities. The samples were collected on August 13 and 17, 2010. The two drums of waste oil and transformer were discovered onsite during initial clearing and grubbing activities.

On August 18, 2010, WRS subcontractor Vinton, Inc. began restoration activities along Bachelor Creek. Vinton, Inc. mobilized equipment to the site on August 18, 2010. Bush hogging/clearing along the south bank of the creek began on August 19, 2010.

Planned Removal Actions

Continue load out of soil stockpile material and creek restoration activities.

Once analytical data received for drum and transformer samples, the material will be profiled for off-site disposal.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
ERRS - Cleanup Contractor	\$4,290,909.00	\$3,819,502.00	\$471,407.00	10.99%
IAGs - USCG	\$30,000.00	\$24,721.00	\$5,279.00	17.60%
RST/START	\$100,800.00	\$15,500.00	\$85,300.00	84.62%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$100,000.00	\$8,500.00	\$91,500.00	91.50%
Total Site Costs	\$4,521,709.00	\$3,868,223.00	\$653,486.00	14.45%

* 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.

response.epa.gov/SoutheasternWood

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