United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, September 1, 2010
From: Art Smith, On-Scene Coordinator

To: Shane Hitchcock, EPA Region 4 Shawn Cecil, KDEP

Subject: Final Polrep
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.:	16	**Site #:**	A4QP
Reporting Period:	01/11/2010 through 04/26/2010	**D.O. #:**	
Start Date:	8/17/2009	**Response Authority:**	CERCLA
Mob Date:	8/17/2009	**Response Type:**	Time-Critical
Demob Date:	11/10/2009	**NPL Status:**	Non NPL
Completion Date:	4/26/2010	**Incident Category:**	Removal Action
CERCLIS ID #:	KYD981473697	**Contract #**	
RCRIS ID #:			

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

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.

CSXT and their contractors began the PRP-lead phase of the removal action on Aug. 17, 2009. Full-Scale stabilization of arsenic-contaminated soils began during the week of 09/14/09 after results from the pilot test passed the Toxicity Characteristic Leaching Procedure (TCLP) for arsenic and chromium.

From 09/14 through 11/10 over 3000 cubic yards (c.y.) of soils were treated. Areas which were treated were covered with layers of geotextile materials and crushed gravel.

During this period a total of 320 c.y. of F035 hazardous waste/debris were shipped offsite to the appropriate EQ facilities in Wayne MI for disposal/treatment.

The storm water conveyance ditch onsite was also scraped to remove loose sediments and approximately two inches of clay soils below. XRF screening was used to guide removal of clay. Soil and sediments were collected in a roll-off box, tested, and disposed of as non-hazardous waste.

On 11/10/09, CSXT's contractors demobilized the site, marking the completion of construction activities. The site is secured, fenced and marked with signage indicating the appropriate CSXT person to contact for additional information regarding the site.

(See POLREPs No. 14-15 for additional background on PRP-lead removal action)

Current Activities
In April 2010, CSXT contractors (Geosyntec and AST Environmental) returned to the site to remove additional soil from the storm water conveyance ditch draining the site. 24 tons of soil were removed and disposed of as non-hazardous solid waste at a neaby landfill. With one exception, the industrial standard of 160 ppm was achieved for arsenic. At one location, the post-excavation arsenic concentration was reported at 177 parts per million (ppm). However, the 28 inches of gravel and rip-rap covering this area prevents exposure and the Administrative Order on Consent (AOC) allows capping in place where the area is under control of the land owner for purposes of restricting access and maintaining the cap.

On 04/26/10, samples of stormwater runoff were collected by Geosyntec to evaluate whether concentrations of arsenic, chromium, and copper were within limits established in the AOC to minimize threats to aquatic species. All results for water samples collected on this date were below the acute water quality criteria for these constituents.

On 06/17/10, the OSC communicated to CSXT in writing that all removal work required by the AOC had been completed, and that EPA would record the completion date as 04/26/10, coincident with the sampling activity occurring on that date.

Planned Removal Actions

Pursuant to the provisions of the AOC, CSXT will continue to monitor the condition of the cap covering the treated soil on a quarterly basis, ending in December 2010.

Next Steps

CSXT will prepare a Final Report documenting the removal action, and EPA will issue a Notice of Completion to CSXT based on review and approval of the Final Report. CSXT is required to provide information in the Final Report regarding the status of application for a restrictive covenant with KDEP to ensure that future land use is compatible with environmental conditions at the site.

Key Issues

NOTE: "Costs to Date" and "Disposition of Wastes" Section of this Polrep are cumulative figures for the EPA-lead portion of this removal action only

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,611,200.00	$1,327,079.00	$284,121.00	17.63%
START	$282,000.00	$264,468.00	$17,532.00	6.22%
USCG GST	$34,800.00	$25,476.00	$9,324.00	26.79%
EPA SESD	$6,000.00	$0.00	$6,000.00	100.00%
Intramural Costs				
Total Site Costs	$1,934,000.00	$1,617,023.00	$316,977.00	16.39%

* 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.

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