

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Holcomb Creosote - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #2  
Holcomb Creosote  
B4E6  
Yadkinville, NC  
Latitude: 36.1622924 Longitude: -80.6771124

**To:**  
**From:** Karen Buerki, OSC  
**Date:** 2/1/2011  
**Reporting Period:** January 24-31, 2011

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4E6	<b>Contract Number:</b>	EP-S4-07-04
<b>D.O. Number:</b>	117	<b>Action Memo Date:</b>	1/26/2011
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/20/2011	<b>Start Date:</b>	1/21/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NCD024900987	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	965285	<b>State Notification:</b>	1/20/2011
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Emergency Response.

#### 1.1.2 Site Description

Holcomb Creosote Company was a creosote wood treating company. It began operations in the 1950s and went out of business in February 2009. Tanks containing creosote, creosote sludge, diesel fuel, and bunker oil, and an open concrete pit containing waste creosote and bottom sediment sludge from treatment of wastewater (F034/K001) remain on-site. There is no secondary containment for the tanks. There are numerous drums and heavily stained soil throughout the process area. The facility consists of a warehouse, office, and boiler room in one building, one 64'x5' pressure vessel, a 50'x80' metal building that covers the drip pad, a RCRA impoundment closed in 1983 and associated RCRA landfarm. The facility is not secured in any way.

##### 1.1.2.1 Location

Holcomb Creosote Company  
5016 US Highway 601  
Yadkinville, North Carolina 27055

Holcomb Creosote Company is located just north of Yadkinville on Hwy 601. It is situated between the highway and a tributary of Deep Creek. This tributary feeds into Dobbins Mill Pond at the southern boundary of the facility. There is a residential neighborhood to the south, bordering Dobbins Mill Pond, and Grace Bible Church adjacent and to the north. The surrounding area is classified Low Income to the east and Non-EJ Area to the west on the map of potential Environmental Justice (EJ) areas generated by the Office of Environmental Accountability.

##### 1.1.2.2 Description of Threat

Creosote contains carcinogenic polynuclear aromatic hydrocarbons (PAHs). Heavily stained soil is visible throughout the process area. Waste creosote and process sludge are a RCRA F034/K001 listed wastes. Waste creosote and process sludge are contained in an open concrete pit and in an unsecured 1000 gallon tank adjacent to it that is beginning to leak. Three horizontal tanks used to supply bunker oil to the boiler have sluges accumulated in them. One of the tanks contains approximately 450 gallons of oil and is leaking. There is a 10,000 gallon creosote tank associated with the "old" plant that still contains

approximately 5,600 gallons of creosote. The insulation for this heated tank has burned off and the tank is severely pitted. There is no secondary containment in this area. There is a 10,000 gallon creosote tank associated with the "new" plant as well. It contains approximately 8,500 gallons of creosote and has also had its insulation burn off and has no secondary containment. The "new" plant used diesel fuel stored in a 10,000 gallon tank. Approximately 700 gallons of off-road diesel is stored in the tank. There is no secondary containment. A small tank used to fuel the debarker contains approximately 20 gallons of off-road diesel.

Friable asbestos insulation is crumbling off of the boiler onto the floor and an asbestos seal around the pressure vessel insulating jacket is cracking. START contractor Tetra Tech collected samples of the boiler material for asbestos analysis. The results show 80% chrysotile. Additional samples have been collected of process pipe dope and boiler ash contained in buckets in the boiler room.

An unsealed manometer, containing approximately two ounces of elemental mercury, was found in the boiler room. Mercury beads were visible on the outside of it and on the ground below it. A Lumex 915+ mercury vapor analyzer was used to confirm the presence of mercury in soil and some debris in the boiler room. Two additional pressure gauges were found on the boiler room floor containing approximately one ounce of mercury each.

Six composite surface soil samples have been collected from the product storage that is being auctioned on February 19, 2011. This area to the north of the process area. START also collected sediment and subsurface samples this week.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

A Removal Site Evaluation was conducted on January 20, 2011, at the request of the NCDENR. Holcomb Creosote Company has been working with their consultant, Northwest GeoScience, to characterize the site. In the Northwest GeoScience report of their July 2010 sampling event, creosote contamination was discovered adjacent to and underneath the concrete pit and in the drip pad area. A NCDENR Notice of Violation dated November 23, 2009, describes a RCRA impoundment that was closed 1983 and a landfarm that was used to treat the contents of the impoundment. NCDENR also performed sediment sampling in June 2009, which revealed sediment contamination. Tanks containing creosote, creosote sludge, diesel fuel, and fuel oil, and an open concrete pit containing waste creosote and sludge (F034/K001) remain on-site. There is no secondary containment for the tanks. There are numerous drums and heavily stained soil throughout the process area. Inside the boiler room, suspected asbestos insulation, around the boiler and capping the insulating jacket at the end of the pressure vessel, had cracked off and was accumulated on the dirt floor. Stained soil was observed throughout the boiler room. During the evaluation, visible sheen was observed being released from the sediment of a tributary to Deep Creek adjacent to the facility. An emergency response was initiated to mitigate the ongoing release of hazardous substances to the environment.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

ERRS contractor Environmental Restoration, LLC, and START contractor Tetra Tech, were notified to respond late on January 20, 2011, mobilized to the site on January 21, 2011, and began removal activities on January 22, 2011.

#### **2.1.2 Response Actions to Date**

ERRS repaired a water leak inside the building. Tree limbs left by the logging company during recent logging activities were removed from the banks of the tributary to provide access and sorbent boom was strung across the tributary to capture sheen. A staging area was constructed to store contaminated debris and stabilized sludge. Debris and scrap metal were segregated into clean and creosote contaminated piles. Scrap metal was loaded out by the PRP. Three 55-gallon drums of hydraulic oil were moved to a machine shop for use as a product.

Friable asbestos was HEPA vacuumed off of the floor of the boiler room and an encapsulant was applied. Asbestos waste was placed into asbestos bags and sealed. START collected air samples from the three interior rooms of the building.

Creosote debris and drip pad liner were staged in the containment area. Process piping was disconnected from the concrete pit and the 1000 gallon tank of creosote sludge was emptied into the pit in preparation for stabilization. Drummed drip pad soil and creosote sludge stored in the building were also consolidated into the pit. Additional drip pad soil and cotton hull solids were used to stabilize the sludge for disposal. The F034/K001 sludge has been stockpiled pending analysis for disposal.

Approximately four pounds of mercury and four drums of mercury contaminated debris and soil were removed and prepared for disposal.

ERRS consolidated all of the drums and pails. Creosote sludges were consolidated into the concrete pit. A cracked 55-gallon drum of used antifreeze was transferred to a secure drum, small containers were segregated according to hazard and drummed for disposal.

Heavy equipment was decontaminated, the stockpile was secured, and all of the waste streams have been sampled to profile for disposal.

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

The PRP is Holcomb Creosote Company. Access was granted verbally in a meeting at the Law Offices of Lee Zachary on January 20, 2011. The remaining assets of the company are tied up in real estate, rendering the company not viable to perform a Removal Action.

#### 2.1.4 Progress Metrics

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
F034/K001 Sludge/Soil		532 tons			
Asbestos/ACM		2 cy			
Oil/Sludge		800 gallons			
Contaminated Debris		20 tons			
Creosote		14,100 gallons			
Lab Pack/HHW		6 Drums			
PPE/Debris/Creosote Lumber		185 cy			
Diesel		730 gallons			
Mercury		4 pounds			
Mercury Debris/Soil		4 drums			
Refrigerant Oil		1 drum			

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Dispose of stockpiled and drummed waste.

#### 2.2.1.2 Next Steps

Secure additional funding to complete a time-critical removal.

### 2.2.2 Issues

An auction is scheduled for February 19, 2011, to sell adjacent land and the metal building. Results of the surface soil sampling on January 25, 2011, show benzo(a)pyrene TEF (cBAP) calculations from 0.02 to 29.4 ppm.

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

No information available at this time.

## 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

### 3.1 Unified Command

### 3.2 Cooperating Agencies

NCDENR is providing support in the response.

## 4. Personnel On Site

- 1 EPA OSC
- 1 START (3 during sediment and subsurface sampling)
- 8 ERRS - 1 Project Manager, 1 Field Clerk, 2-4 Equipment Operators, 2-4 Technicians

Two ERRS personnel were demobed on January 28, 2011. Remaining personnel were demobilized on January 31, 2011.

**5. Definition of Terms**

No information available at this time.

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.