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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #3**
Progress
Holcomb Creosote
B4E6
Yadkinville, NC
Latitude: 36.1622924 Longitude: -80.6771124

To:
From: Karen Buerki, OSC
Date: 6/2/2011
Reporting Period: 2/01/11 - 4/05/11

1. Introduction

1.1 Background

Site Number:	B4E6	**Contract Number:**	EP-S4-07-04
D.O. Number:	117	**Action Memo Date:**	3/17/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	1/20/2011	**Start Date:**	1/21/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	NCD024900987	**RCRIS ID:**	
ERNS No.:	965285	**State Notification:**	1/20/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Fund Lead Time-Critical Removal Action

1.1.2 Site Description

Holcomb Creosote Company was a creosote wood treating company. It began operations in 1951 and went out of business in February 2009. Tanks containing creosote, creosote sludge, and diesel fuel, 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 1988 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 creosote work tanks have sluge accumulated in them. One of the tanks 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 collected from process pipe dope and boiler ash contained in buckets came back non-detect.

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 were collected from the product storage area that was proposed for auction on February 19, 2011. This area to the north of the process area. START also collected sediment and subsurface samples.

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 1988 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, and diesel fuel, 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

The site was demobed on January 31, 2011, in order to secure additional funding. A Ceiling Increase and Emergency Exemption Action Memo was signed on March 17, 2011, and the site was remobilized on April 5, 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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
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

Segregate creosote lumber from logging activity debris. Chip and stage the logging debris in NW corner of property for use as mulch after excavation. Remove remaining scrap metal and stockpile in NW corner of property for recycling.

Remove and dispose of debarker building and small sheds on North lot.

Remove visual contamination from the North lot and South lot, stockpile, dispose. Backfill and seed excavated areas.

Dispose of debris/trash/PPE/asbestos.

Remove asbestos material utilizing negative air enclosures and decommission plant.

Complete mercury removal and dispose of drummed wastes.

Blend stabilized sludge with remaining F034 waste associated with the drip pad and process area (up to two feet). Place notification barrier in areas with contamination remaining at two feet. Dispose of stabilized F034 sludge.

Dispose of creosote and sludge remaining in the pressure vessel and two large tanks and scrap them.

Pump out and remove sludge from the three horizontal creosote tanks and scrap tanks.

Pump around and remove up to 6" sediment in approximately 400' of the creek and place shotcrete fillable liner.

Provide fencing and signage for the land farm and RCRA impoundment.

2.2.1.2 Next Steps

Begin the time-critcal removal.

2.2.2 Issues

Based on results of the surface soil sampling on January 25, 2011, that showed benzo(a)pyrene TEF (cBAP) calculations from 0.02 to 29.4 ppm the auction was postponed.

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

2.5.1 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

The Community Involvement Coordinator assigned to the site is Sherryl Carbonaro.

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
12 ERRS - 1 Project Manager, 1 Field Clerk, 1 Foreman, 1 Health and Safety Officer, 3 Equipment Operators, and 5 Technicians

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.