

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Copiah County Manufacturing - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Disposal of Hazardous Waste from Emergency Response
Copiah County Manufacturing
B4H9
Hazlehurst, MS
Latitude: 31.8719088 Longitude: -90.3836203

To: Phillip Weathersby, MSDEQ
Jim Webster, USEPA R4 ERRB

From: Perry Gaughan, On-Scene Coordinator

Date: 11/20/2011

Reporting Period: Nov 14 through Nov 17, 2011

1. Introduction

1.1 Background

Site Number:	B4H9	Contract Number:	EP-S4-0703
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/26/2011	Start Date:	4/26/2011
Demob Date:		Completion Date:	
CERCLIS ID:	MSD000824961	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Production Facility. Wood Treating

1.1.2 Site Description

1.1.2.1 Location

The Copiah County Manufacturing Site (the "Site") is located in Hazlehurst, Copiah County, Mississippi (31.8719088 latitude, -90.3836203 longitude). The Site is a 25 acre former wood treating facility that during the operational history of the Site utilized pentachlorophenol (PCP) and chromated copper arsenate (CCA) in the treatment process.

The Site is bordered by Georgetown Street to the north and northwest, woods to the east and southeast, and residences on all other sides. A power line easement also dissects the property along the eastern side. Site drainage from the side flows south through an intermittent stream and eventually into a tributary of Bahalia Creek. Still remaining on site are the former treatment building, drying kiln, three former wood storage buildings, office, and a large storage shed.

The Copiah County Manufacturing Site operated as a wood treatment facility and wood retail outlet beginning in 1968. Wood treatment operations ceased in 1996 and the wood retail business ceased in 2001 and the facility closed thereafter. Prior to 1968 the Site operated as a saw mill. A potentially responsible party (PRP) has been identified and can be found in the site file.

1.1.2.2 Description of Threat

In March 2011 Mississippi Department of Environmental Quality (MDEQ) referred the Site to Region 4 Emergency Response and Removal Branch (ERRB) to conduct a Removal Site Evaluation (RSE) at the property. The request was based on the presence of several leaking drums and other containers on site as well as the operational history of the Site. The primary contaminants of concern were CCA and PCP.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During an RSE on April 6, 2011, the presence of 6-10 drums of mostly oil and smaller containers of oil were found onsite. Several of the drums were leaking and causing soil to be impacted nearby. In addition, the former PCP above ground storage tank (AST) was overturned and the sludgy contents were spilling on the ground. The OSC asked the property owner to remove and/or secure the drums. When ERRB and START returned to the Site on April 26, 2011 to conduct further sampling, the drums were still leaking and the impacted soils were not removed. The OSC initiated an Emergency Response to stabilize the drums, remove the impacted soil and search the Site for any additional hazardous materials that may be present.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

As stated earlier, an Emergency Response (ER) was activated on April 26, 2011 to stabilize the drums, remove impacted soils and recover any further hazardous materials located on Site that may pose a threat of release. ERRS crews returned to the Site on November 14, 2011 to dispose of wastes generated in April, 2011. For details of the disposal actions that took place, please refer to Section 2.1.2 of this POLREP.

2.1.2 Response Actions to Date

The following response actions were completed during this reporting period:

- ERRS conducted a Level B/ confined space entry into a 7500 gallon AST to remove pentachlorophenol waste liquid and sludge prior to disposal. Four drums of PCP waste were generated from the tank.
- ERRS removed impacted soil from around the drums and placed the soil into a roll off box.
- ERRS pumped waste oil from a 250 gallon tank on site into a tote prior to disposal.
- ERRS staged remaining miscellaneous cylinders and drums of used oil mixed with water to a central location prior to disposal.

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

Enforcement Activities are ongoing for the Site.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Pentachlorophenol	sludge	800 lbs	EQ Florida		
Oil/water mixture	liquid	200 gallons	EQ Florida		
Flammable Solvents	liquid	100 gallons	EQ Florida		incineration

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

It is anticipated based on analytical results from the April 6, 2011 sampling that a time-critical removal will be warranted at the Site to remove and dispose of soils at the Site. Arsenic and Chromium were found at levels above Removal Management Levels (RML's).

2.2.1.2 Next Steps

The OSC will evaluate the data collected from the April 26-28, 2011 sampling events and determine the need for a time-critical removal action at the Site.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				

ERRS - Cleanup Contractor	\$50,000.00	\$35,000.00	\$15,000.00	30.00%
TAT/START	\$35,000.00	\$25,000.00	\$10,000.00	28.57%
Intramural Costs				
Total Site Costs	\$85,000.00	\$60,000.00	\$25,000.00	29.41%

* 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

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

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.