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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #6**
Temporary Suspension of Activities Due to Weather
Copiah County Manufacturing
B4H9
Hazlehurst, MS
Latitude: 31.8719088 Longitude: -90.3836203

To:
From: Matthew Huyser, On-Scene Coordinator
Date: 2/10/2014
Reporting Period: 1/26/2014 - 2/10/2014

1. Introduction

1.1 Background

Site Number:	B4H9	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	9/12/2013
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	1/6/2014	**Start Date:**	1/6/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	MSD000824961	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time-critical removal action.

1.1.2 Site Description
See POLREP #4, dated 1/14/2014, for Site Description Information

1.1.2.1 Location
The Site is located at 600 Georgetown Street, Hazlehurst, Copiah County, Mississippi. The geographic coordinates of the Site are 31.8719088 degrees North and 090.3836203 degrees West.

See POLREP #4, dated 1/14/2014, for additional Site Location Information

1.1.2.2 Description of Threat
Arsenic and PCP are listed hazardous substances under CERCLA, toxic pollutants under the Clean Water Act, hazardous air pollutants under Clean Air Act, toxic chemicals under EPCRA, and hazardous wastes under RCRA. The US DHHS, the IARC, and EPA have classified inorganic arsenic as a known human carcinogen; the IARC and EPA have classified PCP as a probable/possible human carcinogen.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
See POLREP #4, dated 1/14/2014, for Preliminary Removal Assessment and Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative
During the week of 1/27/2014, site operations were significantly impacted by severe weather. Frozen rain and ice created dangerous driving conditions on 1/28/2014 and site activities were suspended for the day. Road conditions only mildly improved on 1/29/2014 and site activities were delayed for several hours. By the end of the week on 1/30 and 1/31, deliveries of stone or cover material could still not be scheduled due to difficult wet terrain at the quarry; and vehicles for disposal could not be scheduled due to a shortage of available transportation. Rain events anticipated from 2/1 to 2/4 would also impede truck traffic on the Site. OSC Huyser determined on 1/30 that site activities would be suspended for a week; personnel would demobilize on 2/1 and return on 2/10. On 2/6, it was determined that anticipated rain event for the week of 2/10 would still impede truck traffic on the Site and the suspension was extended to 2/17.

During the operable periods in the week of 1/27/2014, ERRS contractor WRS compacted cover material on zones 500 and 700. A small mechanical compactor was utilized next to the buildings and a track dozer was used on the remaining area. A roller will be mobilized to the site to complete compaction on all covered zones.

Vegetation and debris was cleared from impacted areas zones 800 and 900 to prepare for cover material and ensure that an adequate seal is made. with the ground.

The concrete pad on the covered storage shed and the concrete pads on the exterior of the process building were swept and generally cleaned. A two-part epoxy was applied to the surface of the concrete to seal it and prevent direct contact or runoff from elevated arsenic levels that had been detected at the surface. The specific epoxy material was selected for weather and ultraviolet resistance and was previously used for this purpose at the Fairfax St Wood Treater Site in Jacksonville, FL.

START contractor, Tetra Tech, screened zones 900 and 1000 for surface soil arsenic concentration and marked the areas in which cover material should be applied. Within zone 900, it was determined that nearly the entire floor of the kiln building contained elevated concentrations of arsenic (>200ppm). However, OSC Huyser agreed that the structural integrity of the building was unreliable and installation of cover soils would not be a safe activity. Demolition of the building was sought as a viable alternative; both written and verbal agreement for demolition of the building was obtained from the remaining custodians of the property. During initial demolition preparations, WRS observed that the corrugated roofing material contained a sandwiched fibrous material that could contain asbestos. A sample of the roofing material was collected and sent for laboratory analysis; results returened an asbestos content of 35% Chrysotile; based on these results OSC Huyser determined that the building would not be demolished. As an alternative cover material, 60 yards of viscous grout will be poured onto the earthen floor of the kiln building to prevent direct contact and migration of arsenic contaminated surface soil. In addition, samples of fibrous insulation material piled outside of the boiler room on the east side of the kiln building confirmed the presence of asbestos fibers. The piled material outside is approximately 1-2 cubic yards of waste; it will be removed by a certified asbestos removal contractor and disposed.

During the week of 1/20, soil was excavated to a depth of 18 inches from the southwest corner of the process building near the AST pad. This is apparently the same area where 800-900 gallons of CCA solution was spilled in 1983; however that spill was cleaned up under the supervision of MDEQ and the stained soil excavated near the AST pad is equally likely result from tank spillage. As a result, the approximately 10-12 cubic yards of soil excavated from this area qualifies as RCRA process hazardous waste F035 for "preservative drippage, and spent formulations from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium." Arrangements will be made to dispose of this material in a RCRA Subtitle C landfill.

2.1.2 Response Actions to Date

- Flagged, screened, and sampled ditches 100, 200, 300, and 400
- Established soil staging area
- Cleared working path at ditches 100, 200, 300 and 400 as well as zones 500 and 600
- Completed 6" scrape of ditches 100, 200, 300, and 400
- Removed stockpile of soils from kiln building
- Installed rip-rap drainage control in ditches 100, 200, 300 and 400
- Flagged, screened, delineated and sampled zones 500, 600, 700, and 800
- Flagged and screened zone 900
- Installed cover material on zones 500 and 700
- Sampled and fenced suspected asbestos material
- Scraped hotspot on zone 500
- Sampled wastewater in pressure vessel sumps
- Excavated soil from former AST pad
- Screened concrete pads at former AST and storage building
- Completed sampling of residential property at Erwin Lane

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

Signed access was obtained from the custodian to the property on 12/20/2013

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Non-haz Soil	**Solid**	**(anticipated: 600 ton)**			**Natchez, MS**
Haz Wastewater	**Liquid**	**(anticipated: 3000 gal)**			**Emelle, AL**
Haz (?) Soil	**Solid**	**(approx. 10 ton)**			**Emelle, AL**
Asbestos	**Solid**	**(approx. 2 CY)**			

2.2 Planning Section

2.2.1 Anticipated Activities

During the week of 2/17/2014, installation of cover material on zones 800, 900, and 1000 will be completed. Removal of wastewater from sumps and removal of asbestos will also be completed. Removal and disposal of non-hazardous and hazardous soils will be completed. The pentachlorophenol tank will be decontaminated. Grout will be installed on the floor of the kiln building.

Sampling on zones 900 and 1000 will be completed.

2.2.1.1 Planned Response Activities

- Mechanical scraping, stockpiling, treatment and/or disposal of contaminated surface soils from the drainage ditch exiting the CCM property; (ONGOING)
- Excavation, stockpiling, treatment and/or disposal of contaminated surface soils (upper 12 inches) from accessible areas in adjacent residential properties that exceed a cleanup standard for residential uses; (COMPLETE)
- Removal, treatment and/or disposal of pentachlorophenol hazardous wastes as well as any other containerized hazardous wastes that may be encountered at the Site; (ONGOING)
- Disposal of hazardous and non/hazardous wastes at an off-site location; (ONGOING)
- Install semi-permanent ground cover over surface soils within CCM property that exceed arsenic concentrations of 160mg/kg; (ONGOING)
- Install stable ground cover in drainage ditch to slow surface water flow for the prevention of off-site migration; (COMPLETE)
- Grade and establish vegetative cover on all contaminated surface soils to reduce runoff and dust for the prevention off-site migration; and, (ONGOING)
- Continue sampling and monitoring, as needed, for site safety purposes and to further delineate or identify contaminants. (ONGOING)

2.2.1.2 Next Steps

See sections 2.2.1 and 2.2.1.1 above.

2.2.2 Issues

Approval of waste disposal profiles for non-hazardous and hazardous wastes are pending. Both the Subtitle D landfill in Natchez, MS and Subtitle C landfill in Emelle, AL have been approved by EPA according to the requirements of the "off-site rule" of 40 CFR 300.440.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

A remotely monitored air monitoring system is setup daily using two DataRAM 4000's. One DataRAM is deployed near the operating area at the ditch while the second is set atop the office trailer at the entrance of the site. A third dust monitor is attached to the excavator and data collected by the monitor will be regularly downloaded for evaluation.

An alarm level of 0.9 mg/m3 has been established for total particulate dust levels for on-site monitoring. Average total particulate dust concentrations have been below 10 ug/m3.

2.6 Liaison Officer

N/A

2.7 Information Officer

N/A

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

MSDEQ

4. Personnel On Site

EPA (1)
ERRS WRS (9)
START Tt (1)
MSDEQ (1)

5. Definition of Terms

Ditch 100 - longer, lower south ditch approximately 1100 feet long
Ditch 200 - near end of the 100 ditch and approximately 150 feet long
Ditch 300 - just north of the 200 ditch and approximately 50 feet long
Ditch 400 - near the beginning of the 100 ditch and approximately 400 feet long
Zone 500 - adjacent to the chemical storage and treatment building
Zone 600 - in the treated wood storage area at the northwest corner of the Site
Zone 700 - north of the dried material storage building, located between the kiln and the treatment building
Zone 800 - on the eastern side of the site, between the kiln building and the reminants of the saw mill
Zone 900 - in and around the kiln building
Zone 1000 - near the soil stockpile approximately 100 yards southeast of the kiln building

6. Additional sources of information

6.1 Internet location of additional information/report
N/A

6.2 Reporting Schedule
POLREPs will be submitted weekly

7. Situational Reference Materials

N/A