

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Southeastern Wood Preserving - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #24
Final POLREP
Southeastern Wood Preserving
041L
Canton, MS
Latitude: 32.6181000 Longitude: -90.0161000

To: Matt Taylor, USEPA R4 ERRB
Richard Ball, MS DEQ
Jim Webster, USEPA R4 ERRB
Shelby Johnston, EPA

From: Subash Patel, On-Scene Coordinator

Date: 9/4/2014

Reporting Period: April 17, 2014 to September 4, 2014

1. Introduction

1.1 Background

Site Number:	041L	Contract Number:	EP-S4-07-03
D.O. Number:	0042	Action Memo Date:	9/25/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/4/2013	Start Date:	8/31/2009
Demob Date:	5/1/2014	Completion Date:	7/21/2014
CERCLIS ID:	MSD000828558	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Fund-Lead Time Critical Removal Action

1.1.2 Site Description

The Southeastern Wood Preserving Site is an abandoned wood preservation plant which operated from 1928 until it filed for bankruptcy in early 1979. The Site covers approximately twenty acres and is located in a predominantly commercial/residential area just east of downtown Canton, Madison County, Mississippi.

Multiple investigations and actions have been taken by the State of Mississippi and the EPA throughout the years, including an EPA initiated an emergency response action in 1986 to stabilize three unlined surface impoundments that contained creosote sludge and water as well as an August 2009 emergency response action to remove contaminated soil and sediment and installed a slurry wall along the south bank of Batchelor Creek. These multiple sampling events and response actions have found polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxins contamination in surficial and in subsurficial soils both on and off-site.

The Preliminary Assessment and Site Inspecting (PA/SI) was completed on July 17, 2009. The Site was proposed to the NPL in March 2011. The Site was listed on the NPL on May 15, 2012. The RI/FS, including a Human Health Risk Assessment, is underway with phase 1 completed in May 2013. In order to evaluate if any of the private properties adjacent to the SWP Site are impacted by Site contaminants, surface and subsurface soil samples were collected during Phase 1 of the RI/FS. Of the 45 properties sampled, nineteen exceeded the Regional Removal Management Levels for dioxins and benzo(a)pyrene in residential and commercial soils. These residential and commercial properties were referred to the Region 4 Emergency Response and Removal Branch to address under a Removal Action.

1.1.2.1 Location

There are twelve residential and seven commercial properties of concern. The properties are spread throughout a 17-acre area of Northeast Canton, Mississippi. The properties are located south of the SWP Site, across Covington Drive, between Miller Street to the West, Parker Street (Barfield Street) to the East

and North of Barfield Street. One property of concern is located near the intersection of Yandell Avenue and Miller Street. One additional property of concern is located near the intersection of Miller Street and Covington Drive.

The residential properties consist of small lots with houses and outbuildings. A number of the residential properties have vegetable gardens. A few lots are sparsely vegetated, and exposed surface soil is present; playground equipment is also present. Vacant lots are not fenced, and there is also evidence of exposed surface soil and children playing in these areas.

1.1.2.2 Description of Threat

The elevated benzo(a)pyrene and dioxin contamination presents a high probability of exposure to persons who live in the community. The contamination is found at ground surface. The Site consists of residential and commercial properties that are unsecured. There are children in this community who play in multiple yards. A number of the yards also have vegetable gardens. The hazardous substances in the soil pose a direct contact threat to the surrounding population. Benzo(a)pyrene and dioxins are classified as probable human carcinogens and have been shown to have mutagenic, reproductive, and developmental health effects.

Benzo(a)pyrene and dioxins are hazardous substances as defined by CERCLA 101 (14) and listed in Title 40 of the Code of Federal Regulations (CFR), Section 302.4. The EPA's TSS has reviewed the EPA residential sampling results and the EPA Removal Site Evaluation and determined there is a threat to public health and the environment resulting from the elevated benzo(a)pyrene and dioxin contamination present at the Site. This contamination is persistent and has been released to the yards of at least nineteen properties of the Center Terrace Community of the City of Canton.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Region 4 Superfund Remedial program conducted the Phase 1 Remedial Investigation Feasibility Study between November 6, 2012 and September 30, 2013, which included sampling of surface and subsurface soils from residential and commercial properties adjacent to the SWP Site.

In order to evaluate if any of the private properties adjacent to the SWP Site are impacted by Site contaminants, surface and subsurface soil samples were collected from 45 locations. At each location, a five-point composite surface soil sample was collected for chemical analysis from zero to six inches and subsurface samples were to be collected from six to twelve inches below ground surface, in an approximate 50 x 50 foot grid. If needed, subsurface soil samples were collected from thirteen to twenty-four inches in an approximate 50 x 50 foot grid.

Of the 45 properties sampled, twelve exceeded the Regional Removal Management Levels (RML) for dioxins and benzo(a)pyrene in residential soils, and seven commercial properties exceeded the Regional RMLs for dioxins and benzo(a)pyrene in industrial soils.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The removal action that occurred from Fall 2013 to Spring 2014 addressed the residential/commercial properties adjacent to the former Southeastern Wood Preserving property. All commercial properties within the boundaries of Covington Drive, Barfield Street, Miller Street, and Parker Street were treated as residential properties due to close proximity to residential properties. Only one commercial property, 381 Miller Street, was treated as a commercial property since it was located in a commercial area. EPA's Technical Support Services (TSS) recommended this approach.

Site Specific Removal Management Levels

Dioxin TEQ and benzo(a)pyrene are the contaminants of concern. TSS recommended a site specific residential RML of HQ=1 for dioxin TEQ (50ppt) for properties located within the boundaries of Covington Drive and Barfield Street and a site specific commercial RML of HQ=1 (750ppt) for commercial properties outside the Covington/Barfield/Miller/Parker street boundaries in order to stay consistent with EPA's Remedial Section. The site is listed on the NPL and properties found to exceed HQ=1 dioxin TEQ may be addressed by the Remedial Section.

Properties found to have elevated concentration of dioxin TEQ or benzo(a)pyrene within one foot in soil depth were excavated to clay layer if within one foot depth or to a maximum one foot depth. Properties found to have elevated level of dioxin TEQ or benzo(a)pyrene within two feet in soil depth were excavated to clay layer if within two feet depth or to a maximum two feet depth.

A correlation was noticed with sample depth result and location of clay layer. Properties found to exceed the site specific RMLs at two feet have clay layer at around one and a half feet. Properties found to exceed the site specific RMLs at only one foot have clay layer at around eight inches. In few areas where clay layer was not reached, soil was excavated two feet.

2.1.2 Response Actions to Date

The following properties have been addressed:

Residential Properties

607, 605*, 603, 561, 557, 553, 549, 543, 535, 531, and 525 Barfield Street.

340 Miller Street

Commercial Properties addressed with Residential RMLs

552, 544, 535, and 464 Covington Drive.

353 Parker Street

Commercial Properties addressed with Commercial RMLs

381 Miller Street
560 Covington Drive**

*605 Barfield Street

Property owners were informed that their vegetable garden slightly exceeded the site specific RML for dioxin TEQ. Sample result for soil in vegetable garden revealed a dioxin TEQ concentration of 53ppt. The owners did not want their garden excavated. After discussions with TSS, it was determined that the vegetable garden did not need to be addressed. MDEQ supported the decision.

**560 Covington Drive

Commercial property is located within Covington/Barfield/Miller/Parker street boundaries and therefore should be addressed as a residential property according to TSS' recommendation. However, property owner did not want EPA to excavate on his property. Excavation activities would require him to temporarily shutdown his business. The property exceeds residential RMLs but is below commercial RMLs. Instead, EPA only excavated soils from property's vegetable gardens as allowed by owner. Areas that were not excavated were covered with crushed rock to reduce exposure to soil.

Flow Control Ordinance

City of Canton required EPA to send excavated nonhazardous soil to the Canton Landfill regardless of cost due to city's Flow Control Ordinance. EPA's attorney sent the OSC an opinion stating that EPA should abide. The ordinance required approved waste generated within city's limits to be disposed in city's landfill. The landfill was CERCLA-approved. About 6,000 tons of nonhazardous soil was sent to landfill for disposal. The remaining soil not sent for disposal is being staged.

Staged Soil

Some soil excavated from the site were covered and staged at the former Southeastern Wood Preserving property. The staging area is currently owned by the property owner of 464 Covington Drive. Staged soil will be addressed by EPA's Remedial Section.

ATSDR

The agency visited the site in April to film for site documentation. In addition, they met with several residents during site activities and joined EPA and other agencies during a community meeting in the Fall of 2013.

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

The enforcement process is currently moving forward. The seven commercial properties are currently being vetted to determine liability.

2.2 Planning Section

2.2.1 Anticipated Activities

The former Southeastern Wood Preserving property will be addressed by EPA's Remedial Section in future.

2.2.2 Issues

None.

2.3 Logistics Section

Not applicable.

2.4 Finance Section

2.4.1 Narrative

The costs listed below estimates for informational purposes and for the current removal action. They do not account for any past costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				

ERRS - WRS Compasss	\$1,600,000.00	\$1,560,000.00	\$40,000.00	2.50%
START - TetraTech, EMI	\$345,138.00	\$234,000.00	\$111,138.00	32.20%
Intramural Costs				
Total Site Costs	\$1,945,138.00	\$1,794,000.00	\$151,138.00	7.77%

* 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

2.5.1 Safety Officer

The Safety Officer and Assistant Safety Officers for the site were assigned. A Site Specific Health and Safety Plan was created. EPA, START, ERRS and MDEQ concurred on the plan. A copy of the plan is found online at www.epaosc.org/SoutheasternWood. A hard copy with appropriate signatures was maintained on-site in the Site Trailer.

3. Participating Entities

3.1 Cooperating Agencies

State of Mississippi Department of Environmental Quality

City of Canton Mayors Office

City of Canton Police Department

4. Personnel On Site

The following personnel were on-site at various times throughout the reporting period:

EPA: 1

START: 1

ERRS: 11

MDEQ: 1

5. Definition of Terms

5.1 Commonly Used Abbreviations

OSC: On-Scene Coordinator

START: Superfund Technical Assistance Response Team Contractor

ERRS: Emergency Response Removal Services (ERRS) Contractor

MDEQ: State of Mississippi Department of Environmental Quality

TEQ: Toxicity Equilivent

6. Additional sources of information

6.1 Internet location of additional information/report

The site website and online repository for documents, pictures, figures, and reports are found at www.epaosc.org/SoutheasternWood.

6.2 Reporting Schedule

POLREP should be generated monthly unless an issue arises.

7. Situational Reference Materials

The site website and online repository for documents, pictures, figures, and reports are found at www.epaosc.org/SoutheasternWood.