

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Thursday, March 31, 2005

From: Steve Spurlin

To: Fazi Sherkat, KYDEP
Tim Hubbard, KYDEP

Anita Davis, USEPA
Jim McGuire, EPA

Subject: Initial Polrep
Kentucky Tie and Timber
311 East Hurt Road, Mayfield, KY
Latitude: 36.7969000
Longitude: -88.6425000

POLREP No.:	1	Site #:	A4JS
Reporting Period:	03/30/2005 to 03/31/2005	D.O. #:	
Start Date:	3/30/2005	Response Authority:	CERCLA
Mob Date:	3/30/2005	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	KYN000409771	Contract #	
RCRIS ID #:			

Site Description

On March 29, 2005, EPA On-Scene Coordinator (OSC) Art Smith was contacted by the Kentucky Department for Environmental Protection (KYDEP) Superfund program regarding an abandoned creosote wood-treating facility in Mayfield, Graves County, KY. The site is located at 311 E. Hunt Road in Mayfield and was formerly operated as Easterday Tie and Timber from 1977 until 2002. At that time, Kentucky Tie & Timber (KY TT) purchased the property and continued wood-treating operations. KY TT ceased operating and abandoned the property in 2004. A recent inspection of the premises by KYDEP in January 2005 disclosed evidence of creosote spillage from piping adjacent to the above-ground product storage tanks. The facility is readily accessible and recent evidence of trespassing collected by the KYDEP Paducah Regional Office has prompted concerns regarding potential exposure to contaminants.

Upon receipt of email correspondence from KYDEP formally referring the matter to EPA, OSC Smith mobilized to the Site on March 30, 2005 to conduct a Removal Site Evaluation (RSE) pursuant to Section 400.310 of the National Oil & Hazardous Substances Pollution Contingency Plan (NCP).

Current Activities

At approximately 1400 hrs. CST on March 30, OSC Smith arrived onsite accompanied by Gary Morgan from the KYDEP Paducah Regional Office, and observed the following conditions:

- The primary area of concern is the secondary containment area around the creosote storage tanks. Approximately 25,000 gallons of stormwater has accumulated within the diked area to an elevation within a few inches of the top, and is threatening to overflow. Evidence of recent discharge via overflow in this area was noted (see Polrep image). A strong creosote odor was observed in this area during the RSE.
- Over 20 55-gallons drums containing waste oils and investigation-derived wastes (IDW) were noted. In nearly every case, the drums have been tampered with by trespassers, and are threatening to release their contents to the environment. KYDEP estimates that the level of vandalism observed onsite has increased significantly within the last 30 days.

The OSC concluded the RSE on March 30, 2005, and determined that the conditions onsite meet criteria for a time-critical removal action listed under Section 300.415 of the NCP. After contacting the current owner who cited a financial inability to address threats currently posed by the Site, the OSC initiated a fund-lead removal action under his delegated CERCLA emergency authority. The OSC mobilized the Superfund Technical Assistance and Response Team (START) contractor (Tetra Tech, Inc.) for purposes of determining the nature and extent of contamination and to document the removal action. In addition, the OSC issued a verbal Task Order to the Region 4 Emergency and Rapid Response Services (ERRS)

contractor (CMC, Inc.) to address the threats posed by the potential overflow and release of hazardous substances to the environment from the tank farm.

Planned Removal Actions

The Task Order issued to ERRS focuses on the initial phase of work at this Site. This involves stabilizing those conditions at the site constituting the threat of an uncontrolled release of hazardous substances. This includes pumping free liquids and sludges from those sumps and collection areas where creosote contamination is suspected. Drums, cylinders and other containers will be accumulated and secured onsite. A limited number of samples will be collected to confirm the nature of threats at the site. This will include an evaluation of whether ceratin pipe and tank insulation materials contain asbestos.

Next Steps

- The on-site response activities for the initial phase of work are scheduled to begin on April 1, and is expected to be completed within the week of April 4.
- EPA is in the process of obtaining reports concerning past investigations into environmental contamination at the Site. KYDEP has reported that a recent study concluded that "fairly significant contamination with creosote in soils and in groundwater at the site".

Key Issues

The KYDEP Regional Office also reported to EPA that they had recently received a complaint from a neighbor who lives near the facility that her children had been playing on the property and she was concerned about any potential health effects. EPA will follow up with local residents to pursue this issue, and inform the public of EPA's response activities at the Site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* 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.

response.epa.gov/Kentuckytietimber

POLREP #1 Last Updated 4/7/2005