

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Statesboro Highway Creosote - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initial POLREP  
Statesboro Highway Creosote  
B4P7  
Sylvania, GA  
Latitude: 32.5923087 Longitude: -81.7054212

**To:**  
**From:** Karen Buerki, OSC  
**Date:** 10/27/2015  
**Reporting Period:** 02/11/2015 - 09/16/2015

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4P7	<b>Contract Number:</b>	EP-S4-15-03
<b>D.O. Number:</b>	PR-R4-15-00493	<b>Action Memo Date:</b>	7/22/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	9/16/2015	<b>Start Date:</b>	9/16/2015
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	GAN000410813	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	N/A	<b>State Notification:</b>	04/28/2015
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time-Critical Removal Action

#### 1.1.2 Site Description

On August 18, 2005, a representative of the Georgia Environmental Protection Division (GA EPD) visited the former wood preserving facility in response to a complaint about an old abandoned creosote vat. The creosote vat was observed behind the current owner's house. The creosote vat is a below-grade open vat approximately 30 feet by 5 feet by 4 feet constructed out of quarter inch sheet metal. It was observed to contain a dark liquid waste with a naphthalene odor. The current owner explained to EPD that her father, who is deceased, used creosote to treat wood posts in the vat during the early 1960s and that the posts were used for fences on the property. The liquid waste was approximately one foot deep in the vat.

##### 1.1.2.1 Location

The Statesboro Highway Creosote Site (Site) is located at 6476 Statesboro Highway, Sylvania, Screven County, Georgia 30467. The Site is a former family-owned wood preserving facility that started operations sometime in the 1940s and continued into the early 1960s. The facility consisted of a weighing area, a vat with wood preserving chemicals that served as the processing area, and the drying and staging area accessible to vehicles. The site is situated in a rural area, and it can be accessed either by Scarboro Highway (south) or Statesboro Highway (east). The closest water body is Simmons Branch half a mile to the east which leads to the Ogeechee River which is located two miles south of the Site. The distance to the nearest residence, other than the current owner, is less than 300 feet at 152 Statesboro Highway.

##### 1.1.2.2 Description of Threat

Creosote is regulated under many statutes. It is a restricted use pesticide under the Federal Insecticide, Fungicide and Rodenticide Act. It is a hazardous substance under CERCLA with a reportable quantity of one pound. It is a RCRA listed hazardous waste as creosote U051 and as process residuals, preservative drippage and spent formulations F034. Creosote contains carcinogenic PAHs, as identified in the September 2002 ATSDR Toxicological Profile for Coal Tar Creosote. The EPA has determined that coal tar creosote is a probable human carcinogen. The September 2002 ATSDR ToxFAQ for creosote shows long term low-level exposure results in skin cancer and scrotum cancer. Short term high-level exposure effects are severe irritation of the skin, chemical burns of the surfaces of the eyes, convulsions and mental confusion, liver or kidney problems, unconsciousness and even death.

Soil saturated with creosote is visible throughout the process area which could pose a direct contact threat to nearby residents that enter the property. The unsecured vat of creosote also poses a direct contact threat and inhalation hazard for anyone that goes near the vat. Analytical results from the March 2012 Removal Site Evaluation show RMLs are exceeded for benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene and indeno[1,2,3-cd]pyrene.

There is also a private well located within 50 feet of the treatment vat. The soil in this part of Georgia is a silty sand. The creosote could easily migrate through the soil and potentially contaminate the groundwater.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In September 2005, GA EPD decided to conduct a site assessment in which waste samples were collected from the vat, and surface soil samples were collected from around the vat. Samples were submitted for Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Polycyclic Aromatic Hydrocarbons (PAHs), and Target Analyte List (TAL) metals analyses. EPD laboratory could not perform the analysis for the waste samples; however, surface soil sample analysis detected the presence of Fluoranthene and Pyrene, both PAHs which are present in creosote.

GA EPD planned to allocate funds from the Hazardous Waste Trust Fund for removal and disposal of the vat and contents; however, these funds have since been exhausted. Therefore, on September 1, 2011, the GA EPD requested that EPA conduct a Removal Action and dispose of the creosote vat and contaminated soil.

A Removal Site Inspection was conducted on March 1-2, 2012. It focused on surface and subsurface soil and waste sampling around and within the abandoned vat of the former wood preserving facility. START contractor OTIE was tasked to provide written and photographic documentation of on-site conditions; and to collect soil and waste samples for laboratory analysis including RCRA metals (arsenic, barium, cadmium, chromium, lead, silver and selenium) and Mercury; target compound list (TCL) VOCs; TCL SVOCs including PAHs; polychlorinated biphenyls (PCBs); and chlorinated pesticides. Analytical results support a Time-Critical Removal.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

An Action Memo was signed on July 22, 2015, for a Time-Critical Removal Action.

#### 2.1.2 Response Actions to Date

ERRS contractor Environmental Restoration (ER), LLC, was selected to perform the Removal Action. On September 16, 2015, OSC Karen Buerki met with John Mulane and Art Slayton of ER, LLC, on-site to familiarize them with the site and discuss planned removal activities.

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

The deceased father of the current landowner operated the facility.

#### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Creosote- treated Lumber					
F034 Soil					
Debris					

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

##### 2.2.1.1 Planned Response Activities

Excavation and disposal of highly contaminated surface soils;

1. The footprint of the process area is approximately 500 square feet. Excavation of up to four feet of contaminated soil from creosote drippage and off-site treatment and disposal will be performed. The excavation will not continue below the groundwater table.
2. Removal and disposal of creosote spent formulation and process residuals;

Approximately 1,100 gallons of creosote spent formulations and process residuals remain in the vat on-site. It will be stabilized with the contaminated soil surrounding the treatment vat and sent for incineration and disposal.

3. Removal and disposal of debris contaminated with creosote;

Debris generated from performance of the removal will be properly disposed of to prevent further contamination.

4. The Site will be restored to the extent practicable;
5. The Site will be referred to the EPD for further evaluation of possible groundwater contamination;

#### **2.2.2 Issues**

#### **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**

No information available at this time.

### **3. Participating Entities**

#### **3.1 Unified Command**

#### **3.2 Cooperating Agencies**

GAEPD - Montague McPherson

### **4. Personnel On Site**

EPA - OSC Karen Buerki

ERRS (ER, LLC) - John Mulane, Program Manager and Art Slayton, Response Manager

### **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.