U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Cowboy Timber - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: **POLREP #1**
Initial POLREP - Cowboy Timber Site
Cowboy Timber
A872
Manderson, WY
Latitude: 44.2839069 Longitude: -107.9603291

To:
From: Craig Myers, OSC
Date: 5/22/2016
Reporting Period: 5/9/16 through 5/22/16

1. Introduction

1.1 Background

Site Number:	A872	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	7/24/2015
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	5/9/2016	**Start Date:**	5/10/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	State referral
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Site is an operating wood treatment facility and sawmill; however, the proposed scope of this removal action is focused on portions of the property that contain unused and essentially abandoned wood treatment structures. Current treatment processes utilize copper naphthenate and fuel oil, a process not a regulated by RCRA. The current treatment process is done in areas that have not been utilized for the PCP-diesel fuel oil process used at the Site. This time-critical removal action is the first federal removal action on the Site.

1.1.2.1 Location

The Site is located at 91 Hwy 31, Manderson, Wyoming, at: Latitude 44.2839069 / Longitude -107.9603291. The property surrounding the Site is primarily agricultural land. The Site sits on a bluff above the Bighorn River.

1.1.2.2 Description of Threat

EPA has considered all the factors described in 40 CFR §300.415(b)(2) of the NCP and determined that the following factors apply at the Site:

> Documented levels of PCP in the surface and subsurface soils exceed Wyoming's promulgated groundwater protection standards. There is no data available to positively conclude that the shallow groundwater on the Site is completely isolated from the groundwater plane associated with the Bighorn River or from the drinking water aquifer utilized by the residents immediately to the south of the Site. Additionally, as noted in Attachment 3 and the START 4 report, the contaminated layers identified in soil boring numbers 3 and 4, at 24 and 29/38 feet below ground surface respectively, indicate a significant downward migration of PCP in less than a tenth of a mile of horizontal distance. If the EPA does not take a response action, all available data indicate potential contamination of deeper aquifer(s) used for drinking water by nearby residents. A summary table of notable PCP detections is provided as Attachment 3, with a more detailed narrative explaining the

results available in the START 3 and START 4 reports in the administrative record for the Site.

"(vii) The availability of other appropriate federal or state response mechanisms to respond to the release"

As discussed in the Site action memorandum, there are no other federal or state mechanisms available to respond to this release.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Wyoming Department of Environmental Quality (WDEQ) Hazardous Waste Division discovered suspected contamination at the Site during a routine inspection in 2011. Due to health issues of the current owner, subsequent inspections and other enforcement activities were delayed. The inspector notified the OSC of the suspected contamination in the spring of 2013, at which point the On-Scene Coordinator (OSC) started a removal site evaluation.

The Site started operations in the 1920s as a small natural gas refinery, reportedly drying the gas by removing natural gas liquids and removing sulfur bearing compounds. Very little information is available at this time as to facility construction or gas throughput. In the 1950s, the facility was purchased by a wood treating company, which started treating posts using a pentachlorophenol (PCP)/diesel fuel mixture. This practice continued through the 1990s, and there is an extensive Resource Conservation and Recovery Act (RCRA) file on the facility.

Investigation by the START contractor yielded surface and subsurface PCP contamination and revealed that the contamination had impacted a shallow groundwater formation. The initial investigation effort was centered on the primary drip pad, where trenches were excavated to allow visual and olfactory assessment and subsequent sampling of suspect soils. The initial sampling event indicated that contamination extended below the depth accessible by the excavator – a depth of 14 feet below ground surface. Details of this sampling event are available in the START 3 Sampling Activities Report in the administrative record for the Site.

A second event was conducted to assess contamination at depth in order to attempt to quantify the depth of contamination in areas where the previous assessment was unable to do so. This effort identified a thin contaminated strata approximately 30 feet below ground surface, indicating significant downward migration. Details of this sampling event are available in the START 4 Trip Report in the administrative record for the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Week of May 9th

ERRS mobilized a small crew to begin demolishing various concrete structures on May 9th, 2016, in order to begin excavation activities on May 16th. They also began Site setup - office trailer, power drops for the mobile lab, etc. START was on Site for two days on May 10th and 11th to establish the sampling/excavation grid and obtain samples from the first lift, which were analyzed in the lab in Denver prior to mobilization. OSC Sandoval was on Site for this period of time.

Week of May 16th

OSC Myers, along with the remainder of the ERRS crew and 3 START contractors, mobilized to the Site on May 16th. START set up the mobile lab that evening in preparation to begin receiving and analyzing samples to guide ERRS excavation efforts. START sampled excavated areas as each grid was completed (see attached grid map) to guide excavation and waste segregation activities in order to minimize the amount of soil requiring treatment.

ERRS continued to break out concrete and began excavation efforts during this time frame. As ERRS demolished the former refinery foundation (see the maps in the START 3 Sampling Activities Report), the crew discovered that six small equipment pads, visible on top of the foundation structure, were actually six very large, heavily reinforced concrete structures extending well below what was believed to be native grade. These structures were estimated to weigh approximately 100,000 pounds each, and may have to be moved if the excavation depth exceeds eight feet. Excavation efforts were slower than anticipated during this time period due to some challenges removing various concrete structures and sorting contaminated debris from clean debris. The majority of the first two excavation lifts of rows 2 through 7 in columns B, C, and D were completed during this week, and graphical depictions of the excavated lifts are available in the documents section of OSC webpage for the Site.

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

EPA is evaluating available enforcement options.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Excavated Contaminated Soil	soil	1,560 cubic yards	N/A	biological degradation, pending	N/A
Contaminated Debris	concrete/steel	115 cubic yards	N/A	pending	N/A

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Sampling, analysis, and excavation activities are expected to continue through the next reporting period.

2.2.1.2 Next Steps

None.

2.2.2 Issues

The large concrete blocks mentioned earlier in this report may become a problem. Resolving this issue may use up a sizable portion of the contingency funds in the action memorandum. To help inform this decision, a blasting company will be on site Monday (5/22) to offer suggestions and to provide a quote to break the structures into smaller, more manageable pieces.The only other option will be to either bring in additional equipment and crew or halt excavation for several days to break them up mechanically.

2.3 Logistics Section

Not Applicable to this action.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Not Applicable to this action.

2.5.2 Liaison Officer

Not Applicable to this action.

2.5.3 Information Officer

Nothing to report.

3. Participating Entities

3.1 Unified Command

Not Applicable to this action.

3.2 Cooperating Agencies

Not Applicable to this action.

4. Personnel On Site

EPA - 1

START - 3

ERRS - 8

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information, and information referenced in this report can be found at https://www.epaosc.org/CowboyTimber

6.2 Reporting Schedule

Reports will generally be filed on Monday for the previous week's activities.

7. Situational Reference Materials

No information available at this time.