

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VIII

**Subject:** POLREP #4  
Progress POLREP for Cowboy Timber Site  
Cowboy Timber  
A872  
Manderson, WY  
Latitude: 44.2839069 Longitude: -107.9603291

**To:**  
**From:** Craig Myers, OSC  
**Date:** 6/13/2016  
**Reporting Period:** 6/6 through 6/12/2016

1. Introduction

1.1 Background

<b>Site Number:</b>	A872	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	7/24/2015
<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>	5/9/2016	<b>Start Date:</b>	5/10/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	State referral
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Site is an inoperative 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.

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:

“(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems”

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.

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.

##### **Week of May 23rd**

Excavation lifts 3 and 4 were completed during this period. Excavated areas were generally in grid rows 2 through 7 in columns B and C. Cell E5 was also excavated down to the 2nd lift elevation.

A demolition company evaluated the large concrete structures mentioned previously, and offered a quote to demolish them. The quote was nearly double the IGCE, and would not have been completed before June 1st. As an experiment, one excavator was configured with the breaker attachment and one of the structures was broken into pieces manageable with equipment on Site. From this test, the crew found that they could break up the structures before the demolition company could be on Site. This did slow down excavation during the week, and will likely extend the excavation phase of the project by a week.

START began conducting personal and area air sampling as the crew encountered high levels of PCP in soils. Results from initial rounds of sampling are all non-detect.

### Week of May 30th

OSC Sandoval was on Site for this period. Excavation lifts 5 through 8 were completed during this period. Removed source contamination through lift 11. Cells C4 through C7 required the deepest excavation. Removed all concrete structures mentioned above and around the pad structure. Began re-grading the entire treatment cell to lift 2. Screen arrived on Site late Thursday, which will be used to remove debris from the sawdust piles that will be used for the treatment cell mixture, as well as removing larger rocks and debris from the contaminated soil prior to treatment. Ran a second round of air monitoring samples for the perimeter and cabin in the excavator. All air sample results to date have been non-detect. Air sampling has been discontinued.

### Week of June 6th

OSC Myers was on Site from June 6th through June 10th. The excavation was largely backfilled and compacted during this period, and a large majority of the excavated soils were amended with sawdust in preparation for treatment. A local irrigation firm was on Site to discuss potential irrigation solutions for the treatment phase this fall. The OSC and START demobilized for the weekend.

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

EPA is evaluating available enforcement options.

#### **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>
Excavated Contaminated Soil	soil	estimated 4730 cubic yards	N/A	biological degradation, pending	N/A
Contaminated Debris	concrete/steel	180 cubic yards	N/A	high temperature/pressure wash, pending	N/A

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

#### **2.2.1.1 Planned Response Activities**

Existing stockpile of excavated soils will continue to be amended with sawdust. Completion expected mid-week next period. Upon completion excavation activities will resume on the southern end of the Site (grid rows 8 through 11). START will remobilize in support of the excavation activities.

#### **2.2.1.2 Next Steps**

Soil will continue to be amended according to the successful treatment regime identified in the treatability study. The report is available in the documents section of the OSC website for more information.

#### **2.2.2 Issues**

None.

## **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 - 1

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.