United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Tuesday, October 17, 2006
From: Robert Kelly/Mike Towle

Subject: Pressure Vessel Cleaning/Subsurface soil sampling
Browning Lumber Site
Route 85 near Rock Lick Creek, Bald Knob, WV
Latitude: 37.8503400
Longitude: -81.6287300

POLREP No.:	14	**Site #:**	A3FD
Reporting Period:	10/16/06 - 10/23/06	**D.O. #:**	
Start Date:	6/19/2006	**Response Authority:**	CERCLA
Mob Date:	6/19/2006	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description
The Browning Lumber Company operated a pressure treatment facility at the site location until 1996 and a sawmill at the site location until 1998. Chromated Copper Arsenate was utilized during the pressure treatment processing of lumber and the company obtained an EPA ID number for hazardous waste activity in 1987; the company also received a WV/NPDES Permit for operation of the treatment facility.

Since the facility's abandonment in 1998, a fire destroyed portions of the facility. However, during an inspection conducted by WVDEP in July, 2002, to evaluate compliance with the West Virginia Hazardous Waste Management Act, residual products from the operations conducted at the facility were observed on the site. WVDEP observed that human trespassing was occurring at the site by evidence of dumped materials and trash. WVDEP conducted TCLP sampling and determined that elevated TCLP values for arsenic were present in one of the pressure treatment vessels and in the soil below the vessel.
WVDEP contacted EPA Region III and requested that they take the lead in conducting a full assessment at the site and take any necessary actions in mitigating the threats at the site.

On June 19, 2006, the OSC activated a removal action at the site under his delegation of authority for $250,000. Initial actions included the installation of an entrance fence and coordination with the Army Corp of Engineers (ACOE) for assistance in design/construction of an access bridge across Pond Fork stream.

OSC received Stream Crossing Plan from ACOE on 06/20/2006.

EPA has notified current and former owners and/or operators of the Site that they may be potentially liable for the costs incurred by EPA for the Site clean-up.

On September 13, 2006, a Removal Action Memorandum for the amount of $2,516,339 was signed to address the environmental issues at the Site.

Current Activities
ERRS removed transfer pumps and piping from tank area and staged on plastic next to the debris pile. They scraped the pressure vessel door and just inside the vessel. The drums containing CCA sludge from the 500 gallon product tanks were staged next to the debris and metal piles. ERRS continued to pressure wash the inside of the pressure vessel door and pump the sump as needed. Staining still remains after approximately a day and a half of pressure washing. EPA evaluating the effectiveness of the cleaning.

ERRS moved the debris pile from the concrete pad and staged the debris on plastic next to the south end of the concrete pad. The debris pile was moved because its original location was located in a low area of the concrete pad where rain water collects. In addition, ERRS pumped out water and clean sludge from the SW concrete pad in preparation for subsurface soil sampling underneath the pad. ERRS pressure

washed four lumber carts from the drip pad rails for the second time.

EPA confirmed the ASTs and pressure vessel belonged to Mr. Browning. Permission to cut the AST for cleaning was obtained by EPA. EPA informed ERRS to obtain the equipment and personnel in order to clean the AST and pressure vessel. EPA also tasked ERRS to begin disposal arrangements for waste disposal. ERRS moved the contaminated metal pile to the north end of the concrete pad in order to keep it from setting in a low spot on the pad where rain water collects. ERRS pressure washed the concrete pad east of the pressure vessel and pushed the water and soil toward the pressure vessel sump where it was pumped into the storage tank. ERRS created a concrete berm along the west side of the concrete pad and AST to prevent further runoff during operations. The SW corner of the concrete pad is heavily stained by the CCA.

ERRS cut the top five feet of the AST with the chop saw and torch. The trackhoe was utilized to support the top section while the cutting operation was conducted. The sludge within the tank was not exposed to the weather until the proper materials was available to cover the tank. ERRS calculated the amount of water collected from the sumps and pressure washing activities on the concrete pad. ERRS calculated 2420 gallons have been collected.

During this operating period, START, using the Geoprobe,processed and collected a total of 90 samples which included 14 surface, 62 subsurface, 9 duplicate soil samples, and 5 rinsate samples. A portion of the samples were shipped on October 26, 2006 with the remaining samples being shipped on October 30, 2006. The OSC expects to have unvalidated results in about 7 days from the time the samples arrive at the lab. The validated sample results are expected in 30 days.

Next Steps

Decontaminate AST and pressure vessel.
OSC will continue to coordinate Site activities with the State.
OSC will make arrangements to meet with the Trustee Project Manager at the Site to review on-going and future actions at the Site.

response.epa.gov/browning