

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Wednesday, November 15, 2006

From: Robert Kelly/Mike Towle

Subject: Cleaning of Vessals and Demobe from Site
Browning Lumber Site
Route 85 near Rock Lick Creek, Bald Knob, WV
Latitude: 37.8503400
Longitude: -81.6287300

POLREP No.:	15	Site #:	A3FD
Reporting Period:	10/30/06 - 11/07/06	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

October 30, 2006 (Mon)

ERRS conducted the first confined space entry into the pressure vessel to begin the decontamination process. ERRS began shoveling bulk material from the pressure vessel. Operations were conducted in level B. The process generated dust which exited the pressure vessel. Plastic sheeting was hung on the door to minimize the dust from exiting the vessel. The dry sludge was wetted down, however the water tended to run across the surface of the sludge with minimal penetration into the sludge. ERRS transferred approximately 2200 gallons of water from the vertical storage tank to the horizontal storage tank. Wash water from the pressure vessel was directed to a containment area at the SW corner of the concrete pad, then pumped into the vertical storage tank. This containment area still contained plenty of solids after the pumping. After evaluating the amount of effort required to clean this containment area, ERRS decided to

redirect the wash water into a drum off the southern end of the concrete pad, then into the vertical storage tank to minimize the cleanup effort.

October 31, 2006 (Tue)

ERRS repositioned the discharge pipe on the pressure vessel. ERRS continued with entries into the pressure vessel to scrape the sides. The bulk material was shoveled into small containers and brought to the end of the pressure vessel to be placed into 55-gallon drum(s). After the removal of the bulk material, ERRS switched to pressure washing operations inside the vessel. The pressure vessel was pressure washed two times which eliminated any visible dust coming from the vessel. After two pressure washings of the vessel, ERRS used the spray from a garden hose to force chips of CCA material to the discharge screen in Level C. The chips were swept up and transferred to a drum.

ERRS deconned the air hoses, and Level B equipment. ERRS shoveled the sludge remaining in the SW corner containment area into a drum. The containment area was pressure washed and wash water pumped into the storage tank.

November 1, 2006 (Wed)

OSC, START, and ERRS evaluated the inside of the pressure vessel. The team observed staining and small particles of chips remaining in the vessel. OSC decided to have the pressure vessel rinsed again and then collect a sample for determining the effectiveness of the decontamination process. ERRS performed a final rinse on the pressure vessel and START collected a rinse sample.

ERRS covered the debris piles, staged metal, drums, tank carcasses with tarps. ERRS collected samples for disposal analysis from the various waste streams. In addition, ERRS completed a final pressure wash of the entire concrete pad.

November 2, 2006 (Thu)

ERRS drained and cleaned out the diaphragm pump and hoses, moved all rental equipment to the guard trailer area for pickup by the various vendors. The removal action has generated two debris piles amounting to approximately 40 cubic yards, tank carcasses, approximately 15 cubic yards of sized piping and metal, a total of 36 55-gallon drums of sludge material from the AST, pressure vessel, and sumps. All personnel demobed from the site. ERRS maintaining 24 hour site security.

November 7, 2006 (Tue)

OSC and START met with PRP's contractor onsite to go over the removal actions completed and the current characterization of the site. EPA explained the extent of the recent sampling activities, however the analytical data is in the preliminary stages. Validated results are expected the end of November.

Planned Removal Actions

OSC awaiting disposal bid package from ERRS.

response.epa.gov/browning