United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, March 8, 2007
From: Steve Spurlin

To: Fazi Sherkat, KYDEP
Tim Hubbard, KYDEP
Anita Davis, USEPA
Jim McGuire, EPA

Subject: Final Polrep
Kentucky Tie and Timber
311 East Hurt Road, Mayfield, KY
Latitude: 36.7969000
Longitude: -88.6425000

POLREP No.:	6	**Site #:**	A4JS
Reporting Period:		**D.O. #:**	02-04-F4-0039
Start Date:	3/30/2005	**Response Authority:**	CERCLA
Mob Date:	3/30/2005	**Response Type:**	Emergency
Demob Date:	6/1/2006	**NPL Status:**	Non NPL
Completion Date:	6/1/2006	**Incident Category:**	Removal Action
CERCLIS ID #:	KYN000409771	**Contract #**	68-S4-02-04
RCRIS ID #:			

Site Description

On March 29, 2005, EPA On-Scene Coordinator (OSC)Art Smith was contacted by the Kentucky Department for Environmental Protection (KYDEP)Superfund program regarding an abandoned creosote wood-treating facility in Mayfield, Graves County, KY. The site is located at 311 E. Hunt Road in Mayfield and was formerly operated as Easterday Tie and Timber from 1977 until 2002. At that time, Kentucky Tie & Timber (KY TT) purchased the property and continued wood-treating operations. KY TT ceased operating and abandoned the property in 2004. A recent inspection of the premises by KYDEP in January 2005 disclosed evidence of creosote spillage from piping adjacent to the above-ground product storage tanks. The facility is readily accessible and recent evidence of trespassing collected by the KYDEP Paducah Regional Office has prompted concerns regarding potential exposure to contaminants.

Upon receipt of email correspondence from KYDEP formally referring the matter to EPA, OSC Smith mobilized to the Site on March 30, 2005 to conduct a Removal Site Evaluation (RSE) purusant to Section 400.310 of the National Oil & Hazardous Substances Pollution Contingency Plan (NCP). The OSC concluded the RSE on March 30, 2005, and determined that the conditions onsite meet criteria for a time-critical removal action listed under Section 300.415 of the NCP. After contacting the current owner who cited a financial inability to address threats currently posed by the Site, the OSC initiated a fund-lead removal action under his delegated CERCLA emergency authority.

Current Activities

The overall scope of activities consisted of removing free liquids and sludges, retrieving and securing on-site containers, conducting waste sampling, and arranging for transportation and disposal/treatment/reuse/recycling of hazardous substances. Additionally, after the initial March 2005 stabilization work, EPA's ERRS contractor constructed and operated an on-site wastewater treatment system which ultimately treated an estimated 275,000 gals. of creosote contaminated wastewater.

From April 1 to April 5, 2005, EPA's contractor, CMC, worked on securing the tank farm and removing liquids from the secondary containment around tanks and from an unlined bermed area. After placing caution tape around the hot zone, CMC began transferring liquid to two frac tanks brought on site. The site also contained drums and propane cylinders, which CMC moved to a designated storage building. In addition, CMC removed creosote from the bottom of the pit at the end of the pressure-treating tanks. The creosote coated concrete and piping inside the tank farm area was then pressure-washed. When the work was completed, equipment was deconned over a grated area and the washwater removed. A lined roll-off container from C&M Environmental was used for debris and used PPE.

Securing the site involved putting chains and locks on the valves in the tank farm, erecting a temporary

barrier around the pit at the end of the pressure-treating tanks, securing the storage building with propane tanks and drums, and placing signs in appropriate locations. Following demobilization in April, the gate to the facility was locked and no onsite work occurred until CMC returned to the site on June 6, 2005. CMC constructed a wastewater treatment system consisting of treatment cells, pumps, hoses, sand filters, and carbon filters. In June, CMC opened and sampled the horizontal tanks and the vertical tanks using an 80-foot manlift, and removed and treated water from the secondary containment area around the tanks, and the pit behind the vertical tanks. Following dewatering, contaminated soil was removed from the pit and stockpiled, and samples were sent for analysis.

In June, 2005, gas and propane cylinders stored onsite were picked up by Airgas and the local gas company, and clean fill was delivered to the site for backfilling the pit. On June 29 and 30, the CMC crew disassembled the treatment pools, covered the open-top tanks, and cleaned up the area. CMC also completed decontamination of the frac tank, treatment cells, sock filter, and loader.

On July 1, 2005, CMC's crew prepared the site for demobilization and demobilized equipment, personnel, office and break trailers, and portable toilets. Telephone and electric service were disconnected, and two treatment cells and a frac tank were left on site.

The CMC Project Manager returned to the site on October 4, and the CMC startup crew remobilized to the site on October 6 and began setting up the office trailer, tool trailer, poly tanks, and liners for the 10,000-gallon pools. On October 7, the crew conducted a site walk-through with the OSC and reviewed work scope and safety issues. In addition, CMC took delivery of sand, pea gravel, and carbon for the treatment system. The holding pools were then set up, a discharge field was prepared for treated water, and water from the secondary containment areas for the on-site tanks was pumped to the pools. Operation of the water treatment system began on October 14, 2005.

CMC also removed creosote and creosote/water mixtures from on-site tanks beginning on October 10, and several shipments of creosote and creosote/water mixture were loaded out for shipment to Railworks, Inc. in Memphis to be reused or recycled. Work in October also included removal of miscellaneous items from treating rooms and demolition and dismantling of pipes and valves. During this activity, approximately 2 pounds of mercury were found and arrangements made for disposal.

In November, CMC continued shearing scrap from process tanks, cleaning the steel, and sorting it into clean (recyclable) or contaminated metal debris. CMC also continued pumping residual oil/water from the sump at the treating cylinders, from the pit in the treatment building, and from the secondary containment area. Water from the treating building sump was pumped to the water treatment pool, and creosote/water was pumped from the sump under the outdoor rectangular tank. Water treatment and discharge continued. On November 8, CMC demolished the treatment building, and other dismantling and removal activities continued, including removing the heating coils from the vertical tanks and stripping insulation from the treating cylinders.

No site activities occurred from November 18 through November 28 because of extremely wet conditions. On November 30, CMC began removal of concrete from the secondary containment at the tank battery.

In December, the treatment and discharge of water continued, as did removal of concrete from secondary containment at the vertical tank battery. Other tasks included shearing, cleaning, and sorting steel, cleaning the pit at the south end of the treatment cylinders, and pumping residual oil/water to the frac tank from the sump at the treatment cylinder and from the pit in the treatment building and secondary containment.

During January, 2006, CMC continued to clean scrap steel and to cut and clean treating cylinders. Other work included sorting debris from sludge, transferring sludge from the horizontal tank to rolloffs, and pumping and treating the water on-site.

Work in February involved pumping and treating water, cleaning the frac tank, stockpiling backfill material, breaking and removing concrete, and excavating and stockpiling contaminated soils. In addition, sludge was loaded out to Onyx. While excavating creosote contamination along the footers of the treatment building, CMC discovered a buried drainage pipe leading from the building to the drainage ditch on the eastern side of the site. CMC excavated the pipe and associated creosote contamination. A portion the treatment building foundation was excavated, as well as the sump area at the northern end of the cylinders. These areas were backfilled. At the end of the month, CMC loaded out the sludge box, sampled the stockpiles of waste material, deconned equipment, and tore down the water treatment pools.

In March, CMC decontaminated and removed equipment from site. CMC returned to the site on April 17 to load out contaminated soil for disposal at the Onyx incinerator. CMC also sorted demolition debris and

concrete. In May, CMC continued loading out contaminated material and demolition debris for disposal at the Onyx incinerator and loaded out soils for burial to Waste Management. CMC also sorted demolition debris and concrete, consolidated miscellaneous drummed waste for shipment to Onyx incinerator, staged backfill, and crushed culvert pipe. Cleaning of the drip pad was completed, and used oil was loaded out to the recycler.

In late May, transport of the remaining conrete/debris cresote waste was completed. The contractors equipment was deconned and demobbed. On June 1, 2006, the mercury waste was tranported for disposal. This completed all planned removal actions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$2,200,000.00	$1,751,143.00	$448,857.00	20.40%
RST/START	$200,000.00	$111,446.00	$88,554.00	44.28%
Intramural Costs				
USEPA - Direct (Region, HQ)	$60,000.00	$57,530.00	$2,470.00	4.12%
USEPA - InDirect	$1,000,000.00	$947,586.00	$52,414.00	5.24%
Total Site Costs	$3,460,000.00	$2,867,705.00	$592,295.00	17.12%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Creosote contaminated soils for incineration	1312.28 tons		Onyx Env., Sauget, IL
Creosote soil/debris for direct landfill	63.20		Waste Mang., Inc., Emelle, AL
Creosote Sludge for incineration	166,380 lbs		Onyx Env.,Sauget, IL
Creosote Debris for macroencapsulation	73.11 tons		Michigan Disposal WTP, Bellville, MI
Creosote oil/wastewater for recycle	55,892 gals		Tangent Rail, Memphis, TN
Scrap Steel for recycle	132.82 tons		TriState Industrial, KY
Non-Haz Demo debris	109.62 tons		Waste Mang. of KY, Mayfield, KY
Mercury Cont. Debris	1 drum		Wayne Disposal, Bellesville, MI
Mercury Apparatus/recycle	110 lbs.		Lighting Resources, Greenwood, IN

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