

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Tuesday, July 10, 2007

From: Art Smith

Subject: Initial Polrep- Removal Site Evaluation
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.: 1	Site #:
Reporting Period: 04/10/2007 through 07/10/07	D.O. #:
Start Date:	Response Authority: CERCLA
Mob Date:	Response Type: Time-Critical
Demob Date:	NPL Status: Non NPL
Completion Date:	Incident Category: Removal Assessment
CERCLIS ID #: A4QP	Contract #
RCRIS ID #:	

Site Description

In November 2006, EPA was notified of this site via an NRC report indicating a potential release of hazardous substances at the Kentucky Wood Preserving facility in Winchester, KY. The facility was reported to have ceased operations in October 2006, and that wood treating chemicals abandoned onsite may pose a potential threat of a release. The company used Copper Chromated Arsenate (CCA) wood preservatives, and the treatment works were reported to be full of CCA solution at the time that the business ceased to operate. Based on this information, EPA OSC Smith initiated a Removal Site Evaluation (RSE) under Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

Current Activities

On 04/10/07, EPA OSC Smith and KDEP Superfund Branch staff conducted a removal site inspection. At the drip pad area, KDEP collected a sample of liquids from the containment sump beneath the primary treatment cylinder. The liquid level in the sump was observed to be within 1 foot where the sump would overflow. On the drip pad and adjacent to the treatment building itself, eight 55-gallon drums were present, five of which were in a gated enclosure. Of the three remaining drums which are unsecured, one appeared to be full and was labeled as F035 hazardous waste.

The former treatment area was inspected, where 2 additional pressure cylinders were found. Staining of soils beneath the cylinders was a greenish yellow color, indicating contamination with CCA constituents. An above-ground storage tank used to collect condensate from the cylinders was discovered to be about one-half full of an unknown liquid substance.

During the site inspection, KDEP utilized an x-ray fluorescence (XRF) instrument to evaluate for metals in surface soils. All measurements were found to be elevated for arsenic and chromium at levels exceeding recognized values for natural background conditions in the local area. Maximum concentrations detected via the XRF instrument were approximately 200 parts per million (ppm) for arsenic and 375 ppm for chromium.

Prior to leaving the site, inspection of an unlocked storage trailer onsite disclosed the presence of small containers of cleaning solvents and photographic development chemicals, which were suspected to contain hazardous substances.

After the site inspection, KDEP reported to EPA the following information:

- Analytical results for wastewater samples collected from tanks and containment at the site revealed arsenic and chromium at maximum levels of 67 and 152 milligrams per liter (mg/l), respectively. These tanks are currently holding approximately 40,000 gallons and will spill unless action is taken to mitigate an overflow.

- Volume calculations for process tanks in the treatment building indicate that an additional 30,000 to 40,000 gallons of CCA product are also stored onsite and that these tanks are full.
- On 06/12/07, KDEP visited the site and discovered that vandals had broken into the treatment building and pried open the door of the pressure cylinder. KDEP also related that they had spoken to a nearby resident, who had expressed concerns about trespassing to the local police.

Planned Removal Actions

Conditions at the site meet the requirements for initiating a time-critical removal action, according to the following criteria listed in the NCP:

- Section 300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants"; CCA constituents (arsenic, chromium, and copper), and F035 hazardous wastes are listed hazardous substances under CERCLA Section 101(14). Due to the lack of controls on access to the site and the documented trespassing incidents, there is an immediate threat of actual or potential exposure via direct contact to these substances.
- Section 300.415(b)(2)(iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release"; CCA product solutions and wastewaters are stored in an abandoned condition, and may be released due to deterioration of the containers, or through or acts of vandalism.
- Section 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"; high intensity short duration rainfall events will eventually cause an overflow of F035 wastewaters into the environment.
- Section 300.415(b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release"; KDEP referred the site to EPA for action on 06/15/07, citing an inability to fund the removal action.

Due to the existing threats, and the imminent potential for releases of hazardous substances to occur, I recommend that this site be given a high priority for removal eligibility.

Next Steps

Due to the seriousness of the situation, the OSC will initiate a time-critical removal action at the Site during the week of July 16, 2007. An ERRS contractor will be given a verbal task order under the OSC's emergency authority to secure the site, clear debris, and collect samples for purposes of arranging for the offsite disposal/treatment of wood treating solutions.

Key Issues

At the present time, there are no potentially responsible parties (PRPs) identified who are financially capable of performing the immediate response actions. EPA continues to collect additional information on past owners and operators of the site, and will take appropriate steps to ensure PRP participation, where applicable.

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