

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Tuesday, July 31, 2007

From: Art Smith

Subject: Cleanup Activities Continue
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.:	3	Site #:	
Reporting Period:	7/23/07 to 7/29/07	D.O. #:	
Start Date:	7/18/2007	Response Authority:	CERCLA
Mob Date:	7/18/2007	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
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). See Polrep No. 1 for more complete information on the RSE.

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 referred the site to EPA on 06/15/07, for purposes of conducting a time-critical removal action, citing concerns over the unstable conditions at the site. Due to the seriousness of the situation, the OSC initiated a time-critical removal action at the Site on 07/18/07. The 1st phase of the removal action is short-term in nature and is designed to mitigate immediate threats. Work activities include securing the site, clearing debris, and arranging for the offsite disposal/treatment or legitimate reuse of wood treating solutions. This phase of work is expected to be completed by September 1, 2007, at an estimated cost of up to \$250,000.

Current Activities

Various removal activities have taken place during the reporting period from 07/23/07 to 7/29/07 and are as follows:

- ERRS crews used a power washer to clean asphalt in the support zone area and the contamination reduction zone.
- ERRS crews cleared and cleaned area for equipment decontamination.
- Kentucky Utilities and an electrical contractor completed electrical service installation.
- ERRS crews repaired and replaced portions of the fence around the site perimeter.
- ERRS crews placed construction fence between the exclusion zone and the contamination reduction zone.
- ERRS subcontractor DANT Environmental procured a laboratory for personnel arsenic urinalysis.
- ERRS subcontractor Red River Ranch arranged for wood chipper delivery and set-up.
- ERRS moved wood piles and debris to clear an area for the wood-grinding machine.
- ERRS cut and prepared wood for the wood-grinding machine.
- One tractor-trailer load of treated lumber was loaded and transported off-site for commercial re-sale.
- Rick Bowlby with BPB Corporation, a local wood-treatment facility, was on site to detail the typical CCA wood treating processes. This information was useful in planning the solution tank sampling

procedures. Mr. Bowlby also provided useful information on the reuse and recycling of CCA concentrate and solution.

- ERRS and START collected samples from the solution tanks in the treatment building. Samples were shipped to Environmental Science laboratory for analysis of pH and TCLP metals for disposal purposes. Samples were also be shipped to Arch Chemical for analysis of Chromium, Copper, and Arsenic (CCA) concentrations for reuse and recycling purposes. Samples were collected from the following tanks: (1) recycled water tank, (2) work tank, (3) sump area, (4) concentrate tank, and (5) solution tank. In addition, a sample was collected from the above-ground storage tank located near the former treatment building.
- ERRS subcontractor, DANT Environmental, calibrated and set-up air sampling and monitoring equipment in the work zone. The monitoring equipment measures particulates in the air and the sampling equipment collects particulate samples for arsenic analysis.
- A-1 Portable Buildings loaded and transported one storage trailer off site. The trailer, which was owned by A-1, contained paper products, which were disposed of as solid waste. Several commercial printing machines were transferred into another stored in another storage trailer onsite owned by KY Wood Preserving.

Planned Removal Actions

During the week of 7/30/2007, work activities are expected to include the following:

- Biological monitoring of site workers for Arsenic
- Health and Safety Plan update, review, and discussion with site workers.
- Air monitoring equipment will monitor for particulates; air sampling equipment will collect particulate samples for arsenic analysis.
- Grinding and disposal of wood products onsite. This activity is expected to generate 2,500 to 3,000 cubic yards of wood chips which will be reclaimed for commercial resale as a mulch product.
- Continue sourcing best option for CCA solutions (reuse or disposal)
- Inventory any additional hazardous materials on site.
- Secure additional site fencing around site perimeter.

Key Issues

- The site continues to attract interest from passersby who appear to be interested in salvaging scrap metal found on the site. In one instance, a couple of vagrants walked onto the site undetected and came to the office asking if they could recover a piece of scrap metal. Until the CCA solutions are disposed of, maintaining the 24 hr. security presence is a top priority for this removal action.

response.epa.gov/kywood