

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Thursday, September 27, 2007

From: Art Smith

To: Shane Hitchcock, EPA Region 4

Shawn Cecil, KDEP

Subject: Emergency Cleanup Phase Complete
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.:	7	Site #:	A4QP
Reporting Period:	08/27/07 through 09/26/2007	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 #:		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 emergency 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 of wood treating solutions. This phase of work is expected to be completed by September 10, 2007, at an estimated cost of up to \$500,000.

Current Activities

Removal activities which have taken place during the reporting period from 08/27/2007 through 09/26/07 are as follows:

- ERRS loaded 50,090 gallons of CCA solutions into tanker trucks for transport to the Heritage Environmental disposal facility in Indianapolis, Indiana. The materials were shipped as hazardous waste, and will undergo wastewater treatment at the off-site facility. ERRS collected pH measurements on each load of CCA solution prior to loading into tanker trucks, and no loads were found to be corrosive.
- EPA Community Involvement Coordinator Carbonaro distributed information packets regarding the upcoming public meeting to the surrounding neighborhood.
- START and ERRS collected surface water samples from the inlet and outlet sides of the stormwater outlet control structure. The sample was analyzed and the structure is filtering up to 50 % of the arsenic leaving the site via stormwater runoff.
- ERRS cleared brush and debris from around the treatment and maintenance buildings in preparation for site assessment activities scheduled for 09/24/07.
- ERRS moved small quantity hazardous wastes (5 gallons pails and smaller) found scattered across the

site to a central staging location in the former maintenance building. ERRS collected samples of the small-quantity hazardous waste stored onsite and the 30 cy soil stockpile generated from construction of the outlet control structure. Waste profiles will be generated for these wastestreams upon selection of appropriate disposal options.

- ERRS removed water from the above-ground storage tank and applied it as dust suppression. Previous analyses for the water in this tanks showed levels of arsenic and chromium at concentrations below that found in stormwater runoff at the site.
- ERRS used power washing and a vacuum truck to move CCA sludge from the CCA pit, work tank, and secondary work tank into the recycled water tank. Approximately 3,580 gallons of this material were transported as a corrosive hazardous waste liquid to the Heritage Environmental disposal facility in Indianapolis, Indiana for solidification and subsequent landfilling in a Subtitle C facility.
- All tanks and the containment pit in the treatment building were then inspected by the OSC and determined to be free of liquids. The recycle water tank contains 6"-8" of a semi-solid sludge which can not be removed without confined space entry (see image above). As the building itself, and the tanks will require demolition at a later date, the OSC determined that the response actions performed during the emergency phase of the removal action were sufficient to mitigate the threat of a release of hazardous substances.

ERRS, START and EPA demobilized the site on 09/13/07, marking the completion of the emergency phase of the removal action. Site security remains onsite on nights and weekends. The security presence will be discontinued upon completion of the sampling investigation planned for 09/24/07 through 10/05/07.

Planned Removal Actions

-Complete the removal of small quantity hazardous waste staged onsite.

Next Steps

- EPA's Community Involvement Coordinator plans to conduct community interviews during the week of 10/08/07.
- Following completion of the sampling investigation, EPA will evaluate whether Potentially Responsible Parties (PRPs).

Key Issues

-EPA conducted a public meeting on 09/05/07 for neighborhood residents. Approximately 20 people were in attendance. OSC Smith presented a summary of EPA's actions completed thus and a timeline for future activities. Questions posed by the public to EPA concerned possible health effects associated with exposure to arsenic, and the future use of the site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$425,000.00	\$311,434.00	\$113,566.00	26.72%
START	\$50,000.00	\$45,000.00	\$5,000.00	10.00%
ERT GSA Contract	\$10,000.00	\$0.00	\$10,000.00	100.00%
Intramural Costs				
Total Site Costs	\$485,000.00	\$356,434.00	\$128,566.00	26.51%

* 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.

response.epa.gov/kywood