

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, July 24, 2008

From: Art Smith

Subject: Removal Action Continues
Kentucky Wood Preserving
200 Magnolia Street, Winchester, KY
Latitude: 38.0033333
Longitude: -84.1781117

POLREP No.:	11	Site #:	A4QP
Reporting Period:	5/23/2008-7/24/2008	D.O. #:	
Start Date:	3/26/2008	Response Authority:	CERCLA
Mob Date:	3/26/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

See POLREP #1 for details.

Treatment Building A is designated as the building area where operations occurred from the 1950s to the early 1980s.

Treatment Building B is designated as the building area where operations occurred from the mid 1980s till 2006.

Current Activities

- 1) Conducting air sampling with two PDRs at Treatment Building B area.
- 2) The building, tank, and pressure vessel of Treatment Building B have been decommissioned. Metal from the building, tank, and pressure vessel is being deconned with a pressure washer. The scrap metal is then sent off for recycling. Waste from the building is staged into hazardous/nonhazardous piles. The containment pit is the only structure remaining of Treatment Building B.
- 3) Water used for decon is collected in the pressure vessel's containment pit. Pursuant to 40 CFR 261.3(f), the contained-in determination for hazardous contaminated debris, waste is no longer considered listed as long as it does not fail TCLP. Using data obtained from soils where no samples failed TCLP and the XRF, it is determined that the scrap metal will not fail TCLP. Water used to decon scrap metal will be considered a listed waste.
- 4) Excavating, sodding, and fencing of residential property adjacent to the site is complete. Excavation started around May 12, 2008 and restoration was complete around June 9, 2008. Sod is currently being water. Residents returned to their home on May 22, 2008. The estimated amount of nonlisted soil removed and disposed of is 836 tons and the estimated amount of listed soil removed is 50 cubic yards. The listed soils are currently stockpiled onsite.

Planned Removal Actions

- 1) Complete demolition of the containment pit located at Treatment Building B and the drip pad.
- 2) Test soils upon completion of the demolition and remove soils exceeding the industrial removal action levels of 160 ppm for arsenic. It is unknown at this time how much dirt will need to be excavated, if any. These soils may be considered a listed waste.

3) Fill in the pressure vessel containment pit. Any remaining CCA wastewater/sludge will be removed and disposed of as a listed waste.

4) Remove and dispose of soils and debris.

Next Steps

1) Land surveyed performed upon completion shows that the residential property boundaries extend further onto the site than anticipated. Actual boundaries approximately 1,000 square feet into the site. Further characterization of the area is required. The cost and time to complete this task is unknown at this time. Some soils removed from the residential property may be considered a listed waste.

2) Recent information produced by KDEP indicates arsenic runoff by stormwater into the Holly Street right-of-way. Further investigation of the nature and extent of off-site migration from Treatment Building B is required.

3) Nonlisted soil stockpiled on site has been sent for disposal totaling approximately 836 tons. Disposal of nonlisted soils was complete during the week of July 21, 2008. There are 250 cubic yards of listed soils currently stockpiled of which 50 cubic yards originated from the residential yard, and 200 cubic yards originated from channelizing activities around Treatment Building A. Listed soils will be disposed at a later date. The PRP has been notified. These soils were excavated from the residential property and from channelizing activities around Treatment Building A.

Key Issues

The site may take more time than estimated. The additional time and costs have not been calculated at this time. It appears some reallocation of the site's budget will be necessary to fund START through the end of the site.

Also, additional heavy equipment (shears) was needed to decommission the tank in Treatment Building B due to its thickness.

Under the contained-in policy, soils are considered listed if arsenic concentrations exceed the industrial RAL of 160 ppm.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
CCA Wastewater	60,000 gallons		Heritage Environmental Services
Nonhaz Debris	100 tons		Rumpe Landfill
Metal for melt	40 tons		Baker Iron and Steel
Nonhaz soils from residential yard.	835.64 tons		Rumpe Landfill

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