

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

Date: Friday, July 25, 2008

From: Dan Heister

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Subject: 2008 Removal Action
Taylor Lumber Time Critical Removal Action 2008
22100 Southwest Rock Creek Rd, Sheridan, OR
Latitude: 45.0956000
Longitude: -123.4275000

POLREP No.:	7	Site #:	10F1
Reporting Period:	7/21/2008 to 7/25/2008	D.O. #:	
Start Date:	9/5/2007	Response Authority:	CERCLA
Mob Date:	9/4/2007	Response Type:	Emergency
Demob Date:		NPL Status:	
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ORD009042532	Contract #	
RCRIS ID #:			

Site Description

Since 1966, Taylor Lumber and Treating operated a wood-treating plant at 22125 SW Rock Creek Road in Sheridan, Oregon.

Wood preserving chemicals, such as creosote and pentachlorophenol (PCP), were used during operations.

EPA has conducted at least three emergency actions at the site since 1994. During the first emergency response, an underground barrier wall was built to contain the most contaminated groundwater and soil, and an asphalt cap was installed over that area. A residential yard was excavated and backfilled, as well as ditches within and next to that yard and the lumber facility.

On Tuesday August 21, 2007 the US EPA's Emergency Response Unit responded to and confirmed reports that a release of suspected historic contamination had occurred during excavation activities in the SE corner of the former Taylor Lumber facility. Excavation activities were being conducted under the direction the US EPA's remedial program and as part of the contractor's scope of work.

Previous START work completed in September 2007 delineated the lateral extents of contamination along the four management areas (MAs). The results from September 2007 limited removal site evaluation revealed the following:

MA - South East Tank Farm (SETF) - Soil samples collected from boreholes located in the SETF area tested negative for the presence of contamination. No additional work in this MA is required.

MA - Rock Creek Road (RCR) - Subsurface soil contamination was detected in the ditch centerline and along the shoulder of the RCR MA from the driveway entrance to PWPO south to the intersection of Highway 18B. The contamination appears to be limited to several soil horizons below the RCR ditch and extends at least partially under Rock Creek Road. The Time Critical Removal Action (TCRA) will target the ditch centerline for removal.

MA - Highway 18B (H18B) - Subsurface soil contamination was detected in soil borings near both ends of the of the culvert on the north and south sides of H18B. Soil contamination is likely spread along the length of the culvert. The TCRA will target removing as much soil contamination as is practical. The culvert will also be replaced.

MA - Yamhill Drainage Ditch (YDD) - Subsurface contaminated soil delineation in the YDD MA was completed to the extent practical. Contaminated soils were removed from the YDD and stockpiled for future disposal. Several more areas of contaminated soil likely exists in this MA. However, due to the physical constraints of large trees, steep slopes, and highway 18B, further excavation may be limited in the YDD MA.

START completed a work plan for the removal of contaminated soil from the management areas. ERRS completed a work plan for contaminated soil removal, water removal, culvert replacement and temporary stockpiling.

In March 2008, START sampled two soil stockpiles on the Taylor facility and the stockpile of soil from the YDD MA area. The soil samples were sent to a fixed analytical lab and tested for F032, F034, and F035 treatment standards, and the analytical results were used to profile the contaminated soil for disposal. The analytical results and toxicity equivalency factors (TEFs) were calculated to determine the toxicity equivalency quotient (TEQ). The TEQ confirmed the contaminated soil could be disposed under a single variance at Waste Management's hazardous waste landfill near Arlington, Oregon (Arlington). Please see the earlier site-related PolReps for further discussion on the waste variance process. ERRS will schedule the loading and delivery of contaminated soil under manifest to the Arlington landfill after the completion of contaminated soil removal.

Current Activities

FOSC Heister replaced FOSC Callaghan as the EPA On-scene Coordinator.

7/22/2008

OSC Heister, START (4) and ERRS (6) mobilized to the site on Monday July 22. After a safety briefing, excavation work commenced in the RCR MA. Due to close proximity of Rock Creek Road, only the centerline of the RCR MA was able to be excavated so no caving or slumping would occur and compromise Rock Creek Road. Confirmation soil samples were collected at selected locations along the sidewalls and from areas where soil contamination was noted, but was left in-place due to physical limitations. Water that accumulated in the trench was pumped into a holding tank for sediment settling and eventual processing in the former Taylor facility (now called Pacific Wood Preserving of Oregon [PWPO]) water treatment plant.

Northwest Natural Gas company is also working on a natural gas pipeline in the vicinity of Rock Creek Road and Highway 18B. Northwest Natural Gas is working closely with the EPA to manage any soil and water that may potentially be contaminated.

7/23/2008 through 7/25/2008

OSC Heister, START (4) and ERRS (6) continued to remove contaminated soil along RCR ditch centerline and stockpile for disposal. START collected seven soil samples that were delivered to fixed laboratory On-Site Environmental (On-Site) to be analyzed for the presence of SVOCs using EPA Method 8270, diesel using NWTPH-Dx, and metals (RCRA plus copper, nickel, and zinc). A water sample was collected and also submitted to On-Site to be analyzed for the same constituents as the soil plus oil/grease and total suspended solids in order to satisfy PWPO water treatment plant requirements.

Excavation activities were completed in the RCR MA. Organo-clay liner was placed over exposed soils in the trench and backfill was placed on top of the organo-clay liner. The organo-clay fabric should help mitigate future release of soil contamination leaching to groundwater that flows along the RCR ditch. Four concrete bulkheads were spaced along the RCR ditch to dissipate potential violent flow.

Oregon Department of Transportation (ORDOT) met with OSC Heister to discuss the Highway 18B road closure and culvert replacement that is planned for the weekend of August 1 through August 3. Highway 18B is scheduled to be closed from 5:30 pm Friday August 1 through 6 am Monday August 3.

Work was suspended for the weekend of 7/26/2008 through 7/27/08.

Planned Removal Actions

Excavation work will continue to target soil contamination beneath the H18B and YDD MAs.

The culvert beneath Highway 18B will be removed and replaced over the weekend of August 1-3, 2008.

Next Steps

The next activities planned the week of July 28 through August 3 are to:

Load, haul and dispose contaminated soil under manifest to Arlington;

Excavate and sample contaminated soil from H18B MA;

Replace the culvert beneath Highway 18B;

Process captured surface water that is being temporarily stored through PWPO's water treatment plant;

Repair H18B and re-open to the public; and

Prepare to remove and stockpile contaminated soils from the YDD MA.

Key Issues

-Traffic safety

-Complications associated with Excavation need to be considered.

Excavation of further contaminated soils are complicated by roadways (Hwy 18 and Rock Creek Road), Facility buildings (Large 30 bbl above ground storage tank at SE corner of facility), and well established heavy vegetation. The easily reachable contamination on the South side of HWY 18 has already been excavated during EPA's investigation into extent and degree of contamination. Further excavation in the Yamhill drainage ditch will require the removal of well established trees and will begin to compromise the integrity of the river's shoreline. Chasing the soils too far to the east and west of the Yamhill drainage ditch management area will require extensive shoreline management and reconstruction. Shoreline reconstruction is estimated at \$250-300K per an initial ERRS assessment.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$351,000.00	\$233,480.00	\$117,520.00	33.48%
RST/START	\$199,000.00	\$30,000.00	\$169,000.00	84.92%
Intramural Costs				
Total Site Costs	\$550,000.00	\$263,480.00	\$286,520.00	52.09%

* 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/TaylorER_2007

POLREP #7 Last Updated 8/11/2008