

US EPA ARCHIVE DOCUMENT

RCRA Showcase Pilot - Region 6

Koppers/Beazer Creosote Facility, North Little Rock, Arkansas

Koppers/Beazer Creosote facility is an EPA Region 6 - Arkansas Department of Environmental Quality (ADEQ) Corrective Action Strategy (CAS) pilot project. Region 6 has initiated an aggressive program to assist our states in streamlining the RCRA Corrective Action Process. Over the course of the last three years Region 6 with significant input from stakeholders has developed a risk-based guide that can significantly accelerate corrective action at Resource Conservation and Recovery Act (RCRA) facilities. The Region 6 CAS is a flexible guide that can be used to enhance state specific corrective action rules and regulations by highlighting and promoting the use of flexibility found in our national corrective action policy. Under this new approach entire facilities will be evaluated as a whole, investigations and cleanups prioritized on a "worst first" basis to better focus resources (time and money), and corrective action driven by risk based decision making which accurately and realistically reflect current and future land use scenarios and beneficial use of resources.

Facility Name - Koppers/Beazer East
North Little Rock, Arkansas

Wood treatment has been performed at this facility since 1907. The site is currently an active wood treatment plant, and operations consist primarily of pressure treatment of railroad ties and switch ties, however, the facility can also be used for treating lumber, utility poles and some bridge piling material. Three types of wood-preserving compounds have historically been used at the facility: organic-based creosote, pentachlorophenol, and inorganic salts such as chromated copper arsenate and has resulted in DNAPL being present to below 100' at the site. Groundwater interim measures were put in place in 1991 and extraction wells are currently operating. Koppers currently owns and operates the facility. Beazer a former owner has retained responsibility for certain environmental conditions at the facility. The facility has conducted, under a 3008(h) enforcement order, extensive soil and groundwater investigation as a part of the RFA 1986, RFI 1995, Draft CMS and Risk Assessment 1996, but there has been a stalemate on risk issues and the appropriate remedy for the facility. Corrective action was transferred in 2000 to a permit vehicle, and the CAS is being conducted at this facility under a State permit. Koppers is a GPRA baseline facility.

Pilot Project Participants - Koppers/Beazer facility representatives, Arkansas Department of Environment Quality (ADEQ) staff, and EPA Region 6 CAS team members.

Oversight of the Koppers/Beazer CAS Pilot - Oversight of this pilot will be carried out by ADEQ. The Region 6 CAS team members will participate in meetings and serve as technical advisors.

Key Contacts -

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Innovations of the CAS Pilot Program -

- Risk-Based - Prioritizes Corrective Action - facility will utilize screening tables to prioritize corrective action efforts based on risk, worst first approach, focusing time and money for investigations and cleanup, flexibility for the owner/operator in achieving performance standards; ensures protection of human health and the environment. Previously there were roadblocks to determining risk at the site and it was stalling remedy implementation
- State and facility will develop performance standards and data quality objectives early in the

process to drive any additional site investigations and cleanup, providing flexibility for the owner/operator in achieving performance standards.

- Re-evaluated the facility groundwater monitoring plan. Wells which were not providing useful information or providing needed monitoring were able to be decommissioned
- Innovative use of enhanced DNAPL recovery techniques with possible use of institutional controls for dissolved phase off-site
- Conceptual site models being developed based on substantial existing data and used to develop site specific DQOs and performance standards to be used in risk management decisions based on current and future site and resource use
- Streamlines administrative procedures with informal and frequent face-to-face communication throughout the process
- Team members empowered to make decisions, increases trust, increases timeliness

Stakeholder Support for the CAS - Facility will put together a communication strategy that includes public involvement. Public outreach will be performed for all site activities including well installations, risk evaluations, and other activities in an effort to actively involve the many close neighbors and create a positive atmosphere regarding remedial decisions. The CAS promotes early and continued involvement of stakeholders. Encourages states to implement their own established procedures as long as they provide public participation at key decision making stages such as, agreement on performance standards, remedy proposals, and closeout.

Benefits of the CAS - The CAS is a useful approach to corrective action for facilities that are willing to commit resources up front to manage risk at their sites. Since the CAS takes a site-wide approach to corrective action, this may result in more efficient remedy solutions. Provides a relatively easy administrative approach to conduct corrective action. Promotes a cooperative/results based working arrangement (face to face meetings, gained trust reduces review/oversight needs, allows for use of existing data meeting DQOs, etc.) Promotes early discussion of critical issues and expectations (conceptual site model, DQOs, screening criteria, performance standards, etc). Allows flexibility to achieve results (sampling programs, screening approaches, focus on what's important, recognizes that changes may be necessary throughout the process, etc.). Resource utilization can be better predicted (dollars, personnel).

Proposed Project Milestones - The Scoping meeting for the Koppers/Beazer pilot was held on February 22, 2001. Koppers submitted a human health/eco risk assessment in March, 2000. A Risk Evaluation Report/Risk Management Plan will be developed detailing planned remedial actions at the site. Risk evaluations will be completed by August 2001, and a remedy proposal for the site is expected in late 2001. Design for two additional DNAPL recovery wells in July, installation by late August, and testing and full operation of wells in late October.

Measuring and reporting the Progress of the CAS Pilot - EPA Region 6 CAS team members have developed a Virtual Office, which is an information-sharing extranet site, to be used by all CAS pilot project participants. Authorized users of the VO will be able to track and monitor the progress of the pilot project. Non pilot project participants will have access to pilot summary reports and schedules through an Region 6 public web page.

Application of the CAS for other projects - The CAS was developed as a tool for the states to use to expedite corrective action. The concepts in the CAS can be applied for facilities that are just beginning corrective action, facilities that are not making progress with their investigations, or for facilities that need assistance in remedy proposals. The CAS emphasizes the use of existing data, and does not require additional

reporting. For states that have corrective action regulations (generally provide cleanup numbers), the CAS offers an alternative process for completion of corrective action.