

US EPA ARCHIVE DOCUMENT

**Appendix F
COMMUNICATION LOGS**

MEMORANDUM

DATE: February 19, 1997

TO: Docket

FROM: C. Pan Lee, OSW/HWMMD/AIB

SUBJECT: Phone Conversation with Steve Ladner of Kerr-McGee (405/270-2625)

Mr. Steve Ladner has great concern on capacity determination status about soil and debris contaminated with F034. He represents a wood treating company, Kerr-McGee and is from its headquarters at Oklahoma City, Oklahoma.

Mr. Ladner noted that his company has seven facilities and been in wood treating business for 80 to 90 years. He added that 5 out of 7 sites used to use surface impoundments (SI) for processing wastewater but the facilities excavated and closed all SI's ten to twelve years ago. He emphasizes that these sites still have big areas contaminated with F034 surrounding these closed SI's due to possible extensive migration of contaminants. His company had provided comments to American Wood Preservers Institute (AWPI) who submitted its comment (P42A-0039) in response to the LDR Phase IV proposed rule (published August 22, 1995).

Its seven operating wood treating facilities are around residential areas and located in the following places:

- (1) Madison, Illinois,
- (2) Indianapolis, Indiana,
- (3) Columbus, Mississippi,
- (4) Springfield, Missouri,
- (5) Dalles, Oregon,
- (6) Avoca, Pennsylvania, and
- (7) Texarkana, Texas.

None of them are Superfund sites, but 4 out of 7 facilities are under various stages of corrective action process with on-going investigation phase as minimum. Mr. Ladner noted that the sites are in different planning stages, for example, Regions/states are in the process of reviewing some corrective action plan (CAP) and the facilities have no control on clean-up levels for contaminants and time table of clean-up approved by EPA or states. He added that quite extensive contaminated areas really make sites clean-up difficult. Mr. Ladner is aware that a CAMU allows an area of a facility to be remediated without triggering LDR standards if the remediated material is placed back into the area, but asserted that also there is existing legal interpretation issue of whether the contaminated areas are definitely designated as a big CAMU. He would guess at least a few thousands tons of hazardous soil and debris could be generated if excavated for disposal due to the immediate effective date of the LDR standards. The sites would have to plan very differently to comply with regulatory requirements with immediate effective date or with a delayed effective date to the Phase IV LDR standards. He indicated that it can cost about \$500/ton to cover landfilling, transportation, and other miscellaneous expenses if the sites have to ship contaminated soil and debris for off-site disposal and four or five times more for incineration.

DATE: January 16, 1997

SUBJECT: Phone Log with Jim Brown re: NODA Comment Letter (P42A-00013)

FROM: C. Pan Lee, Staff, OSW/HWMMD/AIB

TO: Docket

Mr. Jim Brown (Technical staff, Environmental Protection Division (EPD), Georgia Department of Natural Resources; phone: 404/657-8600) has provided me with some detailed information regarding the quantity and wood preserving wastes mentioned in EPD's comment letter (P42A-00013) in response to Notice of Data Availability for LDR Phase IV Proposed Rule (61 FR 21418; May 10, 1996).

Mr. Brown noted that EPD has been negotiating contracts for removal of soil contaminated with wood preserving wastes (F032, F034 and/or F035) or has ongoing Superfund cleanup activities in coordination with EPA Region IV for six abandoned wood treating facilities in the next two years. He provided the following information:

(1) Escambia site, Brunswick, Georgia:

Excavate about 100,000 tons of soil contaminated with F032 and F034 mixture from spill at storage, production and drippage areas. Of the 100,000 tons of soil contaminated with F032 and F034, 30,000 tons had been removed and the rest will be removed within next two years or so.

This site has closed two surface impoundments (S.I.) which was used to treat F035 wastewater. Mr. Brown added that the excavated soil contaminated with F035 from the impoundments is currently stored in another cell and amounts to about 20,000 tons. The 20,000 tons of contaminated soil will be removed within next two years.

Besides a lot of volatile creosote compounds in the contaminated soil (to be conservative, also identified as F034), the concentration levels of other contaminants in the hazardous soil are as follows:

pentachlorophenol -- 8 mg/kg (passed TCLP and therefore, not D037 wastes)

arsenic -- 170 mg/kg in total composition (TCLP: 0.25 mg/l)

chromium -- 190 mg/kg in total composition (TCLP: 0.19 mg/l)

(2) Of the 12,000 tons of soil contaminated with F032, F034 and F035 mixture in another site, Mr. Brown noted that EPD has removed around 10,000 tons.

(3) The rest of contaminated soil are under contract negotiation for its excavation and removal.

In summary, Mr. Brown confirmed that about 130,000 tons (150,000 minus 40,000 equals 110,000 tons of soil contaminated with F032 and/or F034 plus 20,000 tons of soil contaminated with F035) in total will be removed in next two years or so. He also noted that no K001 contamination in these soil and that EPD does not want on-site treatment for contaminated soil in these sites because all six sites are around the residential areas.

DATE: January 10, 1997

SUBJECT: Phone Log on Comment Letter of Georgia Department of Natural Resources

FROM: C. Pan Lee, Staff, OSW/HWMMD/AIB

TO: Docket

I called Mr. Harold Reheis (phone: 404/656-4713), Director, Environmental Protection Division (EPD), Georgia Department of Natural Resources on January 10, 1997 to gain some details regarding his comment letter submitted in response to LDR Phase IV -- Notice of Data Availability (61 FR 21418; May 10, 1996). His assistant, Mr. David Word, answered the phone since Mr. Reheis was not in. Mr. Word noted that EPD had some characteristics information of six abandoned wood treating facilities and would ask technical staff of EPD to answer my questions.

DATE: July 24, 1996

SUBJECT: Meeting Summary with Members of AWPI

FROM: C. Pan Lee, OSW/HWMMD/AIB

TO: Docket File

AWPI and its members came to the EPA for a 1997 Biennial Reporting meeting (the main purpose of the meeting) in which Dave Bussard, Sara Rasmussen, Robert Buchard, Dave Levy and I of the EPA participated. I had asked the representatives from wood treaters for some questions at the end of their meeting regarding wastewater management practices of wood preserving wastes, especially F032, F034, and F035 in the LDR Phase IV.

Mr. Stephen Smith, Environmental Manager of Koppers, Inc. (Headquarter: Pittsburgh, PA, phone: 412/227-2677) noted that CCA plants (which may generate F035) had no wastewater generated. He added that three quarters of oil-borne plants (i.e., using cresol, PCP for wood preserving) used to use surface impoundments (S.I.) in managing wastewater but now no one use S.I. and all their facilities have switched to use tanks or an enclosed system. Since wood preserving wastes identified as F032, F034, and/or F035 will be impacted by LDR Phase IV if managed in a non-MTR S.I. or other land-based units without meeting LDR standards, Mr. Smith noted again that their facilities do not have a wastewater management problem. He added that a couple of plants in Pennsylvania and West Virginia do send their F-code wastewaters to Chambers Work, New Jersey (about 10 trucks per year) when generating.

DATE: January 21, 1997

SUBJECT: Phone Log with Beth Sheldrake, Region X of EPA

FROM: C. Pan Lee, OSW/HWMMD/AIB

TO: Docket

Beth Sheldrake provided the following site information in relation to soil contaminated with wood treating wastes.

Oesers Company in Washington State was proposed as one of NPL sites on December 23, 1996. It has a total area of 23.5 acres and has been treating wood since the late 1930's.

The wastes include discarded product, contaminated soil and debris, and possibly sludges and other wastes from a groundwater pump and treat system.

The contaminants in the site have PCP and creosote. Dioxin is possibly an issue. Ms. Sheldrake noted that total concentration of PCP could be as high as 165 ppm and that they did not run TCLP test for PCP. She also mentioned that 23 gallons of discarded creosote is on the site.

She estimated that about 5,000 tons of soil and debris contaminated with F032 and F034 from the most contaminated area (hot spots including some from waste pond on the site) will be excavated and removed for disposal if the rule becomes effective in 90 days after the treatment standards for wood preserving wastes in the LDR Phase IV is promulgated. She does not anticipate in-situ treatment will be used for the highly contaminated area. Also, she indicated that they definitely will excavate the 5,000 tons [for treatment?-- uncertain] even though they won't know the types of remediation for this site until several years later.

From: JUDI SCHWARZ
To: DCCS01.DCCSPO2.LEE-CPAN
Date: 12/13/96 2:46pm
Subject: Wood treater LDR - need info! -Reply -Forwarded

Here is another SF wood treater cleanup site in this region. If you need more information, please contact Beth Sheldrake at 206 553-0220.

Even though Beth does not have volume numbers at this time, and we are trying to remove and dispose off-site the most grossly contaminated material prior to April, sites like this one make an important point - namely, new wood treater sites that will require extensive cleanup are still showing up. If I remember correctly, neither the Federal nor the state SF nor RCRA programs were aware of the extent of environmental problems at this facility until the past year.

CC: SHELDRAKE-BETH

From: PETER RUBENSTEIN
To: RTPMAINHUB:DCWIC01:DCCS01.DCCSPO2(LEE-CPAN)
Date: 12/19/96 2:46pm
Subject: wood treater LDR - need info! -Reply -Forwarded -Reply -Reply

Wyckoff Soil OU (used to be named Wyckoff Facility OU)

- 1) K001 is NOT one of the waste codes for this material
- 2) ROD in 1998, RD in 1998-99, RA start in 1999
- 3) Non-time critical removal action underway this February, removal of asphalt and pipe, not soils.
- 4) If all of the contaminated soils are removed it will be approximately 12 acres x 10'. However, this very unlikely.
Most likely treated/capped in place.