



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202

*Buddy*

*Carl —  
"Old" Removal*

FEB 26 1990

*Site Removal*

RECEIVED  
EPA REGION VI  
FEB 28 11:03  
SUPERFUND BRANCH

MEMORANDUM

SUBJECT: After Action Report - American Creosote  
Winnfield, Winn Parish, Louisiana  
Site #G3

FROM: *Robert R. Broyles*  
Charles A. Gazda *inc*  
Chief  
Emergency Response Branch (6E-E)

TO: Sam Becker  
Chief  
Superfund Enforcement Branch (6H-E)

Attached is the On-Scene Coordinator's After Action Report and the removal file for the removal action taken at the subject site.

By this memorandum I am also forwarding a copy of the After Action Report to the Emergency Response Division Director in Headquarters. Please call Ragan Broyles or Greg Fife (OSC) of my staff if you have any questions regarding this report.

Attachment

cc: Tim Fields (WH-548-B)

*004629 RP*

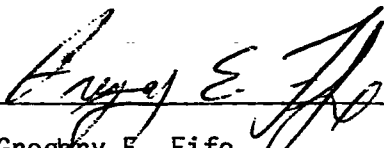
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AFTER ACTION MEMORANDUM

AMERICAN CREOSOTE

Site ID G3

CERCLIS # LAD000239814

  
\_\_\_\_\_  
Gregory E. Fife  
On-Scene Coordinator

B  
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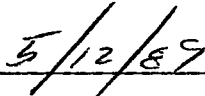
  
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Date

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## I. SUMMARY OF EVENTS

### A. Background:

The American Creosote site is an abandoned creosote and pentachlorophenol wood treating facility located in Winnfield, Winn Parish, Louisiana. Old dilapidated tanks at the site contained contaminated water, oil and sludge. Most of the tanks have rusted through or have rivets missing and are in danger of failing. A waste water pond, sludge pit and several pools were assessable to the public and posed a threat of direct contact contamination. Several backfilled ponds have been identified and are the major source of the offsite migration into adjoining waterways. Poor waste disposal practices resulted in extensive contamination of the surrounding soils, shallow groundwater and surface water drainage courses.

The contaminants present on the site include polynuclear aromatic hydrocarbons (PAHs), the main constituents of creosote, and pentachlorophenol. Several of the PAHs present are probable or suspected carcinogens and mutagens. One gram of creosote has been proven fatal to children. Pentachlorophenol as manufactured contains dibenzo(p)dioxins and dibenzofurans as contaminants. Exposure routes include inhalation, ingestion and direct contact.

Local residents used foot paths, which traversed the site, as short cuts. Children were known to frequently play in Creosote Branch and the drainage ditches. Bicycle, 3-wheeler and 4 wheeler tracks were observed on the site. Exposure to the contaminants from these activities is probable.

The American Creosote site is located on 34.21 acres and is bordered by Creosote Branch on the north, Front Street on the west and residential access roads on the south and east. Wood preserving at the facility began around 1910 by Louisiana Creosoting Company. The plant was operated by American Creosote Works of Louisiana, Inc. from 1939 to 1950 when it was purchased by American Creosote Works, Inc.. Dickson Lumber Company bought the facility in 1977. In 1980, Stallworth Timber Company, Inc. purchased the plant and operated the facility until 1985. Stallworth remains the owner of the facility and property.

### B. Initial Situation:

Structures on site include fifteen large storage tanks, three large boilers, five large pressure treating units, three office maintenance sheds, a tool and dye shop and a gasoline pump with an underground storage tank. A small chemical laboratory contained broken containers and spilled chemicals.

Ten of the storage tanks contain contaminated liquids or sludges and the manway covers on two other tanks have been removed and the contents allowed to spill out. All tanks lack any type of secondary containment system. Some of the tanks are leaking, which has created standing pools of oily material at various locations around the process area. The largest

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pool, which covers about 500 square feet, is located near the north end of the facility. The pressure treating units are set within shallow concrete containments that were full of water and creosote and pentachlorophenol waste.

A sludge pit, a lagoon that has been backfilled with woodchips, and a pond are located on the northeastern portion of the site. Historical aerial photographs indicate that additional lagoons were present during the 1950's in an area east of the process area. A drainage ditch was dug through one of the backfilled lagoons and the profile is clearly evident. A swampy area covering approximately 5 acres extends eastward from the backfilled lagoon area along a small drainage course that flows into Creosote Branch. The surface of this area is covered with a layer of tar like material that ranges from a few inches to about one foot in thickness.

Run-off from the site flows through Creosote Branch about two miles to the confluence with Port de Luce Creek and travels another mile downstream to the Dugdemona River. Two drainage ditches originate on the site near the process area and a third traverses the site from south to north. Creosote, pentachlorophenol and other organic compounds enter these ditches through surface drainage from the process area and subterranean migration which follows the shallow water table. Seeps of black, tar like material can be observed in the banks of the drainage ditches and Creosote Branch. The quantity of this material entering Creosote Branch through seepage alone is sufficient to maintain a continuous sheen on the water surface. PCP is an accumulative poison in fish and creosote increases abortion rates and oxygen consumption and reduces growth rate and survival time in fish.

#### C. Efforts to Obtain Responses by Responsible Parties:

On May 2, 1988, Stallworth Timber Company received an Administrative Order directing the company to erect a fence around the site. Billy Thames was named Facility Coordinator by Stallworth Timber. Mr. Thames and an Attorney for Stallworth Timber met with EPA On-Scene Coordinator Greg Fife, Brent Truskowski, Superfund Enforcement and Seth Lowe, Office of Regional Counsel to discuss the Order and the workplan. On May 24, 1988, OSC Fife met Mr. Thames at the site. The alignment of the fence (Figure 1) and a June 6, 1988 start date were agreed on. Will Shuler was hired to build the fence and post warning signs. The fence construction was completed in July, 1988. Warning signs were posted in September, 1988. The EPA Technical Assistance Team (TAT) monitored the construction and documented the completion.

During the May 24, 1988 on site meeting, OSC Fife found two of the large tanks were in danger of complete failure. It was determined that immediate action was necessary to prevent a catastrophic release. Stallworth Timber was notified verbally of the situation and given the opportunity to respond. Stallworth declined to take action.

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D. Organization of the Response:

On February 29, 1988, the Regional Administrator signed an Action Memorandum for the construction of a fence and sampling of the tanks. The approved project ceiling was \$227,239. On May 27, 1988, the Regional Administrator signed a memorandum granting the redirection of approved funds enabling ERB to respond to an emergency situation posed by the imminent failure of two tanks on site.

Three separate activities occurred during the removal action. These include 2 funded activities and 1 responsible party activity.

- A funded activity occurred on April 4-6, 1988. The Emergency Response Cleanup Services (ERCS) contractor took samples of the materials in the tanks for waste disposal profile analysis.
- A funded emergency response activity occurred from May 31 to June 5, 1988. This activity stabilized and removed the liquids from two tanks which were in imminent danger of catastrophic failure. A berm was constructed to provide a secondary containment in the event of future tank failures. In August 1988, after heavy rain-fall the berm required reinforcement.
- The responsible party erected a fence enclosing the contaminated area of the site. Work on the fence began on June 6, 1988 and was completed in September 1988.

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For the funded actions, the ERCS Response Manager was C.A. "Ben" Benson and the TAT Project Manager was Ann Looney of Ecology and Environment.

E. Resources Committed:

Final costs as of March 28, 1989 are as follows:

Responsible Party Oversight.

Extramural

Technical Assistance Team ..... \$13,101

Intramural

EPA ..... \$ 6,428

Funded Removal

Extramural

Emergency Response Clean-up Services ..... \$95,937

Technical Assistance Team ..... \$32,339

Intramural

EPA ..... \$24,563

F. Location of Contaminants:

A multi-media environmental sampling program was conducted by EPA/ERB, TAT and EPA Emergency Response Team (ERT) during August, 1987. Additional subsurface investigations were performed by ERT and TAT in October, 1987 and June, 1988. These investigations included priority pollutant analyses of soil, surface water and sediment samples from various locations on and off site, soil gas analyses, air monitoring and sampling and bioassays. CERCLA designated hazardous substances including various polynuclear aromatic hydrocarbons (i.e. naphthalene, acenaphthene, phenanthrene, chrysene, fluoranthene), polychlorinated dibenzodioxins and dibenzofurans and chlorinated phenols were found in site soils, liquids and sludges in the plant area, the sludge lagoon, site drainage courses, and Creosote Branch. The contaminants and concentrations are found in Chart 1.

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G. Effect on Natural Resources:

Adverse environmental impacts of creosote are well documented. The compound is toxic to aquatic life and has been linked to high incidences of tumors in fish. Efforts to collect fish from the impacted segment of Creosote Branch for tissue analyses were unsuccessful because none were found. By comparison, Creosote Branch upstream from the site appeared to support aquatic life.

H. Efforts to Replace or Restore Damaged Natural Resources:

The removal actions provides secondary containment for water and oil which would be spilled if one or more storage tanks failed in the future and has reduced the volume of off-site migration of contaminants. However, the actions provide for only a short term remedy and only addressed the plant area. Future actions should address the migration from the back-filled lagoon, the sludge pit, the slough area and remove tanks and ponds, which are the contaminant sources.

I. Threat Abatement Action:

On April 4, 1988, EPA OSC Fife, and ERCS, and TAT arrived on site to collect samples from the tanks for disposal option analyses. Samples were taken from the sludge, contaminated oil and water layers in each tank. The samples were analyzed for organics and dioxin. All personnel departed the site on April 6, 1988.

On May 31, 1988, ERCS, TAT and EPA OSC Fife return to the site to address the two large tanks that were about to fail and release a large volume of contaminated oils, sludges and contaminated water into Creosote Branch. The contaminated water in the tanks was treated through a carbon filter and released to the waste water pond. Contaminated oil from the two tanks and from the concrete containments was removed and placed into a stable tank. Approximately 240 barrels of contaminated oil was recovered and stored in the tank. A berm was constructed around the Main Process area to stop the run-off from this

area. The berm was constructed from clayey soil barrowed from a clean area on the site. This action was completed on June 4, 1988. In August, 1988, heavy rainfall on the site threatened the newly constructed berm. OSC James Staves and ERCS Response Manager Barry Thibodeaux and crew returned to the site to reinforce the berm.

The Responsible Party action began on June 6, 1988 with the construction of the fence. Stallworth Timber contracted with Will Schuler to build the fence and erect warning signs. Stallworth Timber also removed all chemicals from the on-site lab. The action was completed with the posting of the warning signs in September 1988. EPA/ERB and TAT monitored the action by periodic site visits and constant phone contact.

#### J. Public Information/Community Relations Activities:

An Information Bulletin was mailed to local residents in May 1988. The Bulletin informed the residents of the planned actions and the hazards that exist on and near the site. Residents were asked to stay off the site and out of Creosote Branch downstream from the plant.

Project documents are available for public review in Winnfield at the City Hall and the Public Library.

The Winnfield Police and Winn Parish Sheriff departments are well aware of the site and hazards. Both departments agreed to include site drive-bys in their normal patrol schedules.

## II. EFFECTIVENESS OF REMOVAL

### A. Actions Taken by the Responsible Party:

The fence has greatly reduced the traffic across the site. However, the fence has been damaged and has not stopped all access to the site. Stallworth Timber has not maintained the fence with any regularity.

### B. Local Forces:

The Winnfield Police and Winn Parish Sheriff department supplied off-duty officers for security guards.

### C. State Forces:

Louisiana Department of Environmental Quality (LDEQ) has supported the actions by supplying site historical data and aerial photographs. John Halk of LDEQ has made site visits when EPA conducted the investigations and removal actions.

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#### D. Federal Agencies and Contractors:

ERB/EPA monitored the construction of the fence and posting of the warning signs. The ERCS contractor conducted the two separate funded activities consisting of sampling the tanks for disposal profile analyses, and draining the two tanks and constructing the berm.

The draining of the two tanks has eliminated threat posed by failure of those tanks. The remaining tanks are only slightly more stable. The berm has limited the surface migration of contaminants from the process area but does not address the off site migration from drainage courses, the sludge lagoon or back filled lagoons. EPA has continued investigations and designs to address the other immediate threats.

### III. PROBLEMS ENCOUNTERED

Equipment used by Stallworth Timber's contractor, Will Shuler, had limited capabilities and hampered the progress of the fence construction.

Stallworth Timber has not maintained the fence and the integrity has deteriorated.

### IV. RECOMMENDATIONS

EPA should continue to solicit efforts from Stallworth Timber or other Responsible Parties or to take efforts to mitigate the off site migration of hazardous materials from the process area, sludge lagoon, drainage courses and backfilled lagoons.

Future work at the site should be performed by competent qualified contractors who are OSHA certified and have experienced working with hazardous materials.

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