**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 10**
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Reply To
Attn Of: ECL-116

Date: December 10, 1999

From: Mike Sibley, OSC Dept.: USEPA-10 (ECL-116)

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To: See distribution on last page

SUBJECT: POLREP 2 for TAYLOR LUMBER AND TREATING, INC.
Removal Action, Sheridan, Oregon

## II BACKGROUND

Site No.: 10F1
Action Memo Status: September 28, 1999
Delivery Order: PRP Lead
NPL Status: Not listed
Response Authority: CERCLA
State Notification: Oregon Department of Environmental Quality notified
Response Start Date: November 29, 1999
Completion Date: Unknown
Incident Category: Removal Action

The Taylor Lumber and Treating, Inc. (TLT) site, located in Sheridan, Oregon, is a wood- treating facility that manufactures lumber, wooden telephone and electrical power poles, pilings, and railroad ties. The preserved products (poles, pilings, and railroad ties) are coated with either creosote or pentachlorophenol (PCP) solutions. P-9 oil (petroleum products) is also used in conjunction with PCP. In previous years, the facility used a chrome, copper, and arsenic (CCA) solution for preservation. Operating practices and spills have resulted in contamination of surface soil, subsurface soil, and groundwater. Contamination has migrated off site via ditches on the perimeter of the property and via air releases.

Several investigations have revealed widespread surface soil contamination (especially arsenic), contamination of sediment in ditches and groundwater contamination. An EPA Listing Site Inspection was conducted in 1990, RCRA Facility Inspections were conducted in 1991 and 1996, and an EPA Integrated Assessment is in progress. Several residences are located within 3 mile of the facility and ditches lead to the South Yamhill River several hundred feet south of the facility.
The South Yamhill River is habitat to for anadromous fish, including Coho Salmon and Steelhead Trout.
Other recreational species include Largemouth Bass, Bluegill, Crappie, and Channel Fish. Groundwater contamination, roughly 20 feet below ground surface, consists of a product layer one to several feet thick resting on siltstone. The product layer is migrating toward the Highway to the south of the facility and the South Yamhill River.

## IIISITE INFORMATION

**A.Incident Category:** The CERCLIS ID number for this site is ORD009042532.

### B.Site Description

Areas of the site that will be addressed during the removal include surface soil contaminations, surface water runoff, contaminated ditches, and groundwater contamination. Surface soils have varying degrees of arsenic, PCP and creosote contamination. Soils that contain more than 300 ppm of arsenic shall be removed or capped. Surface water transports contaminated surface soils to ditches which transport materials to the South Fork of the Yamhill River. Groundwater is contaminated with a layer of dense non-aqueous phase liquid product (DNAPL) containing PCP, creosote, and oil.

**Removal Activities have been divided into two phases**.

Phase I consists of the following activities:
1. Prevention of off-site migration of contamination via surface water runoff. This objective will be conducted by modifying grading and maintaining french drains and water separators.
2.Excavating of arsenic hotspots (>300 ppm).
3.Staging of contaminated soils.
4.Placing an asphalt cover over certain contaminated soil.

Phase II will consist of soil treatment or disposal and groundwater remediation. Consequently, during phase I tasks and evaluations for phase II activities will be conducted.

### C.Situations

**December 6, 1999 - December 10, 1999**

December 6,1999 (Monday)

Personnel on site: OSC, 1 USCG, 1 START, 8 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40-s (high in the 50s)
TLT constructed small earthen berm along the eastern edge of the incisor area as an interim measure to augment the french drain. The berm directed stormwater into a newly installed catch basin. Water collected in this catch basin is being pumped into the oil/water separator at Outfall 002. The grade around the incisors was adjusted to direct stormwater into the new catch basin. This was accomplished by placing and compacting : - crushed rock in the area.

Taylor Lumber ordered the materials necessary for the installation of the stormwater conveyance system. The wet well will not be delivered for 8-12 weeks. The wet well needs to be installed before the rest of the conveyance system is installed. Therefore, Taylor Lumber is tentatively planning to begin field work related to the conveyance system, starting in February 2000.

ERRS mobilizing to start soil screening operations 08 December. START inspected Sumco construction work and addressed subcontracting and procurement issues.

December 7, 1999 (Tuesday)

Personnel on site: OSC, 1 USCG, 2 START, 8 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40-s (high in the 50s)

TLT completed testing new catch basin and berm, both worked well at keeping runoff on site this completed TLT work for this portion. ERRS took delivery of equipment for screening operation and began setup. START prepared to conduct field screening analysis for PCPs of soils being screened for disposal.

December 8, 1999 (Wednesday)

Personnel on site: OSC, 1 USCG, 2 START, 8 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40-s (high in the 50s)

ERRS began soil screening operation, discovered ineffective on clay, but worked well on rocky soils. Screened approximately 50 cubic yards, washed 15 cubic yards of rock and treated contaminated water from process. START continued preparation for immunoassay testing of soils and conducted long-range planning.

December 9, 1999 (Thursday)

Personnel on site: OSC, 1 USCG, 2 START, 8 ERRS
Weather: Partly cloudy, rain shower, temperature in the 40-s (high in the 50s)

ERRS continued to screen soils, concentrating on rocky soils operation went much smoother. Screened 150 cubic yards of soils and washed 50 cubic yards of rock and treated contaminated water from process. START continued to prepare for

immunoassay and assisted ERRS in determining waste handling strategies. START continued long-range planning and subcontracting activities, and evaluated existing XRF data in preparation for ditch excavation activities.

**D.Next Steps**

1. Screen soils
2. Evaluate groundwater data
3. Install monitoring wells.
4. Conduct pump tests
5. Conduct soil sampling.
6. TLT to complete the Ditch excavation plan.
7. Characterize and excavate soils in the northwest and southeast corners of the facility.
8. Determine disposition of soils.
9. Demob December 17, 1999 for holiday break and remob on January 9, 2000.

**IVCOST INFORMATION**

Estimated costs are summarized below:

| | Established Ceiling | Estimated Costs (As of 12/09/99) |
|---|---|---|
| START | $170,000 | $60,320.84 |
| EPA | $10,000 | $4,500 |
| USCG | $50,000 | $4,368 |
| ERRS | $886,200 | $127,814.24 |
| TOTAL | $1,116,200 | $197,003.08 |

**VDISPOSITION OF WASTES**

The following wastes are staged on site as of December 9, 1999. This is the existing waste which was staged from a spill cleanup which concluded in late November 1999.

Soil Staged in Treating Yard 1,700 cubic yards

As of this date, 65 cubic yards of rock has been washed & screened out of the 1,700 cubic yards which is staged in the treating yard.

**VIDISTRIBUTION**

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