

283SERBSF10,616

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Site Name (Subject): SHERWOOD TREATING CO., INC.

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US EPA REGION IV
POLLUTION REPORT

SUPERFUND SECTION

DATE: 4 AUGUST 1995

FROM: CHARLES EGER, OSC

TO: DOUG LAIR, ERRB/BRANCH CHIEF REGION IV
DEBBIE DIETRICH, HQ
ART JOHNSON, HQ REGION IV
MICHAEL HENDERSON, REGION IV/COMMUNITY RELATIONS

SUBJECT: SHERWOOD TREATING SITE
WINSTON-SALEM, FORSYTH COUNTY, NORTH CAROLINA

POLREP NO.: 12

I. BACKGROUND

REFER TO PREVIOUS POLREPS FOR ADDITIONAL SITE INFORMATION.

II. SITE ACTIVITIES FROM 29 JULY 1995 TO 4 AUGUST 1995

FOUR SEASONS ENVIRONMENTAL (ERCS) CONTINUED TO EXCAVATE SUBSURFACE SOIL CONTAMINATED WITH ARSENIC AND CHROMIUM IN THE AREA WHERE THE TANK CONTAINMENT BUILDING WAS FORMERLY LOCATED. THE SOIL IS BEING STOCKPILED ONSITE AND THEN LOADED INTO TRACTOR TRAILERS. THE CONTAMINATED SOILS ARE THEN TRANSPORTED TO THE PIEDMONT INDUSTRIAL LANDFILL IN KERNERSVILLE, NORTH CAROLINA. TCLP ANALYSES OF ONSITE SOILS HAVE PASSED ALL REGULATORY REQUIREMENTS FOR LEACHING, THEREFORE ALL SOIL IS BEING SHIPPED AS NON-HAZARDOUS AS DEFINED BY RCRA 40 CFR PART 261. A TOTAL OF APPROXIMATELY 4500 TONS OF SOIL HAVE BEEN TRANSPORTED TO THE PIEDMONT LANDFILL DURING THE WEEK. THE TOTAL OF SOIL REMOVED FROM SITE AS OF 2 AUGUST 1995 IS APPROXIMATELY 13877 TONS.

ANALYSES PERFORMED ON SOIL SAMPLES COLLECTED AFTER EXCAVATION OF SURFACE SOILS INDICATED CONTAMINATION STILL EXISTED IN A FEW AREAS. AN ADDITIONAL THREE INCHES TO SIX INCHES OF SOIL HAVE BEEN REMOVED FROM THESE AREAS. EXCAVATION WILL CONTINUE UNTIL ANALYSES ON ALL CONFIRMATION SAMPLES INDICATE THAT ARSENIC AND CHROMIUM LEVELS ON SITE MEET THE PREVIOUSLY DETERMINED CLEAN-UP LEVELS.

III. FUTURE ACTIVITIES

EXCAVATION AND REMOVAL OF CONTAMINATED SOIL TO THE PIEDMONT LANDFILL WILL CONTINUE THROUGHOUT NEXT WEEK. THE TAT WILL CONTINUE TO COLLECT CONFIRMATION SAMPLES AND OVERSEE THE OPERATION OF THE SPECTRACE 9000 USED FOR ON SITE ANALYSES.

THE STOCKPILE OF CONCRETE DEBRIS DEFINED AS F-035 WASTE (DRIP PAD) WAS SCHEDULED TO BE SHIPPED OUT THIS WEEK TO THE LAIDLAW HAZARDOUS WASTE LANDFILL IN PINWOOD, SOUTH CAROLINA. HOWEVER, THIS DATE HAS BEEN PUSHED BACK TO 7 AUGUST 1995, -DUE TO LAIDLAW TRANSPORTATION SCHEDULING PROBLEMS.

IV. PERSONNEL ON SITE

TAT	- 1
EPA	- 2
ERCS	- 6
USCG GST	- 1
ESI	- 1

V. ESTIMATED COSTS

ERCS	- \$964,788.29 AS OF 7/31/95
EPA/TAT	- \$55,221.10 AS OF 8/03/95

Jaek Butler

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AUG 04 1995

SUPERFUND SECTION

US EPA REGION IV
POLLUTION REPORT

DATE: 28 JULY 1995

FROM: CHARLES EGER, OSC

TO: DOUG LAIR, ERRB/BRANCH CHIEF REGION IV
DEBBIE DIETRICH, HQ
ART JOHNSON, HQ REGION IV
MICHAEL HENDERSON, REGION IV/COMMUNITY RELATIONS

SUBJECT: SHERWOOD TREATING SITE
WINSTON-SALEM, FORSYTH COUNTY, NORTH CAROLINA

POLREP NO.: 11

I. BACKGROUND

REFER TO PREVIOUS POLREPS FOR ADDITIONAL SITE INFORMATION.

II. SITE ACTIVITIES FROM 22 JULY 1995 TO 28 JULY 1995

FOUR SEASONS ENVIRONMENTAL (ERCS) CONTINUED TO EXCAVATE SUBSURFACE SOIL CONTAMINATED WITH ARSENIC AND CHROMIUM IN THE AREA WHERE THE TANK CONTAINMENT BUILDING WAS FORMERLY LOCATED. THE SOIL IS BEING STOCKPILED ONSITE AND THEN LOADED INTO TRACTOR TRAILERS. THE CONTAMINATED SOILS ARE THEN TRANSPORTED TO THE PIEDMONT INDUSTRIAL LANDFILL IN KERNERSVILLE, NORTH CAROLINA. TCLP ANALYSES OF ONSITE SOILS HAVE PASSED ALL REGULATORY REQUIREMENTS FOR LEACHING, THEREFORE ALL SOIL IS BEING SHIPPED AS NON-HAZARDOUS AS DEFINED BY RCRA 40 CFR PART 261. A TOTAL OF APPROXIMATELY 2100 TONS OF SOIL HAVE BEEN TRANSPORTED TO THE PIEDMONT LANDFILL DURING THE WEEK. THE TOTAL OF SOIL REMOVED FROM SITE AS OF 27 JULY 1995 IS APPROXIMATELY 9600 TONS.

THE TAT CONTINUED COLLECTING CONFIRMATION SAMPLES FROM AREAS THAT HAVE PREVIOUSLY BEEN EXCAVATED. AN ERCS SUBCONTRACTOR CONTINUES TO ANALYZE FOR ARSENIC AND CHROMIUM USING THE SPECTRACE 9000. TEN PERCENT OF THE SAMPLES ANALYZED BY THE SPECTRACE ARE ALSO BEING SENT TO AN OUTSIDE LABORATORY FOR CONFIRMATORY PURPOSES. THE ANALYTICAL RESULTS ARE BEING USED TO FURTHER DELINEATE SUSPECT AREAS, AND TO CONFIRM THAT ALL ARSENIC AND CHROMIUM CONTAMINATED SOIL IS BEING REMOVED ACCORDING TO THE PRE-ESTABLISHED CLEANUP CRITERIA.

ECOLOGICAL SERVICES WAS ON SITE ON 24 JULY 1995 TO PROVIDE AND OPERATE A GEO-PROBE. THIS WAS USED TO COLLECT ADDITIONAL SUBSURFACE CORE SAMPLES IN THE STOCKPILE AND THE FORMER TANK FARM AREA.

III. FUTURE ACTIVITIES

EXCAVATION AND REMOVAL OF CONTAMINATED SOIL TO THE PIEDMONT LANDFILL WILL CONTINUE THROUGHOUT THE NEXT WEEK. CONFIRMATION SAMPLING OF DESIGNATED AREAS BY TAT WILL ALSO CONTINUE. THE PILE OF CONCRETE IS EXPECTED TO BE REMOVED FROM THE SITE ON TUESDAY 01 AUGUST 1995 AND TRANSPORTED TO LAIDLAW ENVIRONMENTAL SERVICES, INC., IN PINWOOD, SOUTH CAROLINA.

IV. PERSONNEL ON SITE

TAT	- 1
EPA	- 1
ERCS	- 7
USCG GST	- 1
ESI	- 1

V. ESTIMATED COSTS

ERCS	- \$808,708.94 AS OF 7/26/95
EPA/TAT	- \$47,751.26

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JUL 14 1995

SUPERFUND SECTION

US EPA REGION IV
POLLUTION REPORT

DATE: 8 JULY 1995

FROM: CHARLES EGER, OSC

TO: DOUG LAIR, ERRE/BRANCH CHIEF REGION IV
DEBBIE DIETRICH, HQ
ART JOHNSON, HQ REGION IV
MICHAEL HENDERSON, REGION IV/COMMUNITY RELATIONS

SUBJECT: SHERWOOD TREATING SITE
WINSTON-SALEM, FORSYTH COUNTY, NORTH CAROLINA

POLREP NO.: 8

I. BACKGROUND

REFER TO PREVIOUS POLREPS FOR ADDITIONAL SITE INFORMATION.

II. SITE ACTIVITIES FROM 1 JULY 1995 TO 8 JULY 1995

FOUR SEASONS (ERCS) BEGAN EXCAVATING SURFACE SOIL CONTAMINATED WITH ARSENIC AND CHROMIUM USING TRACK-HOES AND A SELF PROPELLED SCRAPER WITH AN ELEVEN YARD PAN. SOIL IS BEING STOCKPILED ONSITE UNTIL IT CAN BE TRANSPORTED TO AN INDUSTRIAL LANDFILL. TCLP ANALYSES OF ONSITE SOILS HAVE PASSED ALL REGULATORY REQUIREMENTS FOR LEACHING, THEREFORE ALL SOIL WILL BE SHIPPED AS NON-HAZARDOUS TO A SUBTITLE D LANDFILL FOR OFFSITE DISPOSAL.

NOTE: A BOILER INSULATED WITH ASBESTOS WAS ERRONEOUSLY REPORTED AS HAVING BEEN TRANSPORTED OFFSITE TO A HAZARDOUS WASTE LANDFILL. IN FACT, THE BOILER WAS TRIPLE WRAPPED AND SHIPPED TO A SUBTITLE D LANDFILL FOR DISPOSAL AS PER REGULATORY REQUIREMENTS.

SURVEYORS WERE ONSITE TO REESTABLISH GRIDLINES IN PREPARATION FOR EXCAVATION ACTIVITIES. ADDITIONAL GRIDLINES WERE ADDED TO INCLUDE THE QUALITY OIL PROPERTY ADJACENT TO THE SITE. FOUR SEASONS SUBCONTRACTED ECOLOGICAL SERVICES, INC. (ESI) TO PROVIDE A GEOPROBE FOR FURTHER SAMPLING.

THE GEOPROBE WAS USED TO RETRIEVE SUB-SURFACE SAMPLES FROM AREAS ADJACENT TO THE SITE IN ORDER TO FURTHER DELINEATE THE CONTAMINATED AREAS. THE TECHNICAL ASSISTANCE TEAM (TAT) COLLECTED SURFACE SAMPLES FROM EACH GRID IN ADDITION TO DEPTH SAMPLES FROM THE CORES RETRIEVED BY THE GEOPROBE.

THE TAT ALSO PROVIDED AIR MONITORING TO INSURE THAT WORKERS ARE DONNING THE APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT, AND

THAT DUSTS GENERATED FROM THE CLEANUP ARE NOT MIGRATING OFFSITE.

A MEETING WAS HELD ONSITE WITH INTERESTED MEMBERS OF THE LOCAL ENVIRONMENTAL GROUP NEIGHBORS FOR ENVIRONMENTAL SAFETY TODAY (NEST). SITE HISTORY AND CURRENT ACTIVITIES WERE DISCUSSED AS WELL AS FUTURE PLANS INVOLVED WITH CLEAN-UP ACTIVITIES. AN EPA FACT SHEET WAS PROVIDED TO THE NEST MEMBERS TO PROVIDE TOXICITY INFORMATION ASSOCIATED WITH THE PROJECT.

III. FUTURE ACTIVITIES

SINCE CLEARING OF VEGETATION AND STRUCTURES FROM CONTAMINATED AREAS HAS BEEN COMPLETED, A SECOND OVERFLIGHT HAS BEEN SCHEDULED FOR JULY 7TH TO DOCUMENT CURRENT SITE FEATURES IN ORDER TO BETTER CHART SITE PROGRESS.

ONSITE METALS ANALYSES USING A SPECTRACE 9000 IS SCHEDULED TO BEGIN ON 10 JULY. THE INFORMATION WILL BE USED TO DELINEATE THE PERIMETER OF CONTAMINATION ONSITE. CONFIRMATION SAMPLES COLLECTED AFTER EXCAVATION WILL BE ANALYZED AS WELL.

IV. PERSONNEL ON SITE

TAT - 2
EPA - 1
ERCS - 6
ESI - 1

V. ESTIMATED COSTS

ERCS - \$81,922
EPA/TAT - \$18,446

Sherwood soil removal underway

EPA has begun excavating contaminated soil as part of an emergency response action at the Sherwood Treating facility in Winston-Salem, N.C.

Four Seasons Environmental Services of Greensboro, N.C., began the dig June 19 as EPA's emergency response cleanup services (ERCS) contractor. About 10,000 cubic yards of soil contaminated with copper, chromium and arsenic will be hauled off-site for disposal in a solid waste landfill in nearby Kernersville. More than half of the eight-acre defunct wood treating site is contaminated to depths of up to eight feet.

Once the soil is removed, temporary groundwater monitoring wells may be installed, although the site poses no threat to drinking water sources.

The cleanup should be completed in about six to eight weeks and will cost EPA between \$400,000 and \$800,000.

A tank with about 10,000 gallons of wood treating liquids has already been emptied and removed.

EPA said the removal will likely preclude the need for any additional cleanup work. The agency said that its cost recovery enforcement strategy is in a "preliminary stage, at best," and that viable PRPs may be hard to find.

Contact: Charles Eger, EPA on-scene coordinator, 404-347-3931, ext. 6134.

Redevelopment job awarded in Ill.

Versar Inc. of Springfield, Va., has been awarded a two-year, \$1.6 million contract to clean up contaminated soil at the Chicago Read Mental Health Facility, under a redevelopment initiative similar to the federal brownfields pilot projects.

Work under the contract, awarded by the **Chicago Read Joint Venture Group**, will include using low temperature thermal desorption and bioremediation via land farming to address contaminated soil — along with asbestos abatement — at two former underground storage tank and above-ground storage tank sites which the state once owned.

Contact: Larry White, Versar Inc., 703-642-6802.

Corps needs oversight contractors

The Army Corps of Engineers, Kansas City Dist., is soliciting bids from contractors to provide architect/engineering, design and oversight services for various hazardous waste sites in EPA's Region 2.

Two indefinite delivery/indefinite quantity contracts will likely be awarded, each to have a one-year base and two one-year options. Each contract could be worth as much as \$15 million, said the *June 26 Commerce Business Daily*.

The Corps expects to make the awards about August 15.

Contact: Phyllis Jackson, corps contract specialist, 816-426-2979; Joseph Donovan, corps technical contact, 816-426-5832, ext. 3024.

Smith's 'principles' keep retroactive liability

Sen. Bob Smith, R-N.H., will retain Superfund's retroactive liability provision for post-1980 toxic waste releases at non-federal sites, according to a "statement of principles" in his subcommittee's forthcoming bill.

The chairman of the Senate Superfund subcommittee, who released the statement late Wednesday night, has opted for liability reform, not repeal, despite past calls for the latter (*Superfund Week 4/28*).

EPA Administrator Carol Browner has argued repealing retroactive liability for post-1980 releases merely substitutes one form of litigation with another, as PRPs quarrel over exactly when hazardous substances were released into the environment.

The subcommittee's principles provide for an independent allocator, to be paid for by the fund, to apportion liability for sites at which there was *both* pre- and post-1980 disposal.

In accordance with past statements by the chairman, the principles also limits the liability of lenders and lessors, who would be held liable only if they caused contamination.

Also, Smith wants to exchange today's law's preference for permanence and treatment for containment, with cleanups that "protect human health and the environment at the lowest cost."

The use of applicable, relevant and appropriate requirements (ARARs) also would be eliminated.

States also would be empowered with much more authority, including the right to veto any site EPA proposes for the NPL.

"States would also be given the authority, with the concurrence of the PRPs, to have sites taken off the NPL to be managed under existing RCRA authorities," the outline read. States would have the option of taking on NPL sites on either a site-by-site or statewide basis, or refuse to take on any sites at all.

For three years after passage of the bill, EPA would be required to provide block-grants to the states to build up their programs. During the same three-year period, EPA would be allowed to make only 30 NPL proposals per year. After that, under a "sunset provision," the agency would be restricted from proposing any additional sites.

Much of the authority would also shift to EPA's emergency response branch. The durations of response actions would be increased to two years under the outline, and EPA on-scene coordinators would be granted the authority to do more extensive cleanups. Toward this end, the funding cap for removals would be increased to \$4 million.

Eastern Michaud Flats remedy study near

FMC Corp. has awarded **Smith Environmental Technologies Corp.**'s Dallas, Texas, office a contract to conduct a feasibility study for cleanup of soil and groundwater at the Eastern Michaud Flats Contamination NPL site in Pocatello, Idaho.

EPA is shooting for a ROD by September 1996.

Smith will perform the FS jointly with **Bechtel Environmental Inc.**, the prime contractor for FMC and **J.R. Simplot**, which agreed to the RI/FS in a 1990 consent order.

Bechtel began sampling at the site more than two years ago (*Superfund Week 3/19/93*). Surface soil, groundwater, sediments, surface water and the air have been impacted. Surface soil has heavy metals including cadmium and arsenic. Soil contamination is restricted to the 200-acre operating areas of the more than 2,500-acre site. Contamination in soil extends from between one and 10 feet below the surface. Some off-site surface soil has been impacted as a result of aerial dispersion.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

January 12, 1995

Mr. Myron D. Lair, Chief
Emergency Response and Removal Branch
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Subject: Sherwood Treating Company
NCD 003 231 545
Winston-Salem, Forsyth County, NC

Dear Mr. Lair:

Based on my telephone conversation yesterday with Mr. Charles Eger, OSC, I understand that the U.S. EPA Emergency Response and Removal Branch plans to return to the subject site on February 6, 1995 to conduct additional sampling. This sampling will be used to determine the extent of contamination and the need for further removal or remedial actions at this site under CERCLA.

As indicated in EPA's Action Memorandum of September 1994, the site is no longer fenced and areas of soil contamination remain accessible to the public. As further indicated in the memo, it appears that EPA had planned to secure and post the site as to its risk as the first phase of the removal project. Since this has not yet been done and the second phase sampling activities are already scheduled, we request that EPA secure and post the site during the February 6 visit. Please let us know if these activities can not be performed as part of this visit so that other actions can be taken to limit site access. I can be reached at (919) 733-2801.

Sincerely,

Pat DeRosa, Head
CERCLA Branch
NC Superfund Section

cc: Mike Kelly
Charles Eger
Fred Overstreet
Pat Williamson
Jack Butler

Bowle
FYE
Pat

Sherwood Treating
Forsyth County

Cleanup of wood-treatment site to cost millions

12/27/99

The EPA says that a 5-acre tract is so contaminated that it may pose a threat to public health.

THE ASSOCIATED PRESS

WINSTON-SALEM — A 5-acre tract where a company chemically treated lumber for almost 40 years is so contaminated that it may pose an imminent threat to public health, the U.S. Environmental Protection Agency says.

The EPA plans to spend almost \$2 million early next year to begin cleaning up the former site of Sherwood Treating Co. Inc.,

which pressure-treated lumber on the east bank of Salem Creek.

The company closed the plant, which is located behind a restaurant, about 1991.

EPA scientists visited the site in May and took 11 soil samples around the now-abandoned buildings and rusty storage tanks. They found very high levels of arsenic and chromium and lesser amounts of 16 other heavy metals, including barium, cadmium, lead, mercury and selenium.

Charles K. Eger with the EPA's Emergency Response and Removal Branch in Atlanta, wrote in a September memo to his supervisor that if the EPA didn't take

immediate action, the release of hazardous substances "may present an imminent and substantial endangerment of public health or welfare or the environment."

Most of the metals at the site cause cancer or are suspected carcinogens at high levels.

Tests by the state in 1990 showed that the groundwater under the site contained high concentrations of chromium and lead and that sediment in Salem Creek also was contaminated with heavy metals. Salem Creek isn't used as a source of drinking water.

No one knows whether the contaminated groundwater has

spread beyond the site, but most of the surrounding area is commercial or industrial and is serviced by the city-county water system.

When Sherwood Treating Co. was in full operation, the company treated 7,000 to 8,000 board-feet of lumber a day using solutions containing copper, chromium and arsenic.

Removing the contaminated soil will run the cleanup costs beyond the \$2 million that Eger estimated, said Shane Hitchcock, another scientist with the removal branch. Eger's estimate was just to stabilize the site, he said.

"If it's like other wood-treat-

ment sites, total cleanup will cost multiple millions of dollars," Hitchcock said.

Federal law allows the EPA to collect cleanup costs from current and past owners of polluted sites and from anyone who may have contributed to the pollution.

Finding the owners of the Sherwood site isn't important right now, said EPA spokesman Carl Terry.

"There's no big rush to find the owners. Now, the emphasis is on cleanup," he said.

"Then we'll switch gears and try to find the responsible parties."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365



SEP 23 1994

4WD-ERRB

Mr. Mike Kelly, Director
Solid Waste Management Division
North Carolina Division of
Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

SUBJ: Sherwood Treating Company, Winston-Salem, North Carolina

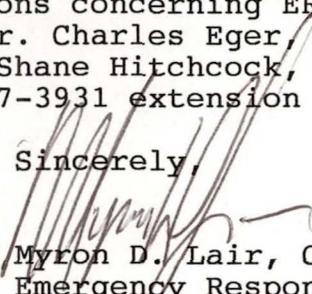
Dear Mr. Kelly:

On May 26, 1994, the U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) conducted a site investigation for potential removal action eligibility under the National Contingency Plan (NCP) at the above mentioned site. Results from the investigation were evaluated using criteria from Section 300.415 of the NCP and current ERRB guidance.

Based upon ERRB's review of the available information, the site has been selected for a high priority removal action based upon the imminent and substantial danger to public health or welfare or the environment. Charles Eger, ERRB On-Scene Coordinator (OSC), will manage the removal action. An Action Memorandum outlining the site threats and removal activities was finalized on September 23, 1994. A copy is enclosed.

Should you have any questions concerning ERRB's determination, please contact Mr. Charles Eger, (OSC), at (404) 347-3931 extension 6134 or Mr. Shane Hitchcock, Chief of Removal Operations Section, at (404) 347-3931 extension 6122.

Sincerely,


Myron D. Lair, Chief
Emergency Response and Removal
Branch

cc: Narindar Kumar, Site Assessment Section, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-ERRB

ACTION MEMORANDUM

SUBJECT: Request for a Removal Action at the Sherwood Treating Company Site, Winston-Salem, Forsyth County, North Carolina

FROM: Charles K. Eger, On-Scene Coordinator

TO: Joseph R. Franzmathes, Director
Waste Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein. The Sherwood Treating Company Site is located at 1660 Silas Creek Parkway in the western part of the City of Winston-Salem, Forsyth County, North Carolina. The site poses a threat to public health and the environment according to criterion specified by Section 104 of CERCLA and Section 300.415 (b) 2 of the NCP. The category of the removal is time critical.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Sherwood Treating Company Site is a defunct wood treatment facility which operated from 1954 to 1990. Previously, the site was used to treat and preserve wood with Fluoro-Chrome-Arsenic-Phenol (FCAP) and Copper-Chromium-Arsenic (CCA) solution. Assessments performed by the NCDHS IN 1986 and 1990 and EPA's Technical Assistance Team (TAT) Contractor in 1994 confirmed elevated levels of chromium, arsenic, Base/Neutral Extractable organic compounds (BNAs), Polynuclear Aromatic Hydrocarbons (PAH), copper, lead, and miscellaneous other constituents.

A site visit and sampling event by EPA and EPA's Technical Assistance Team (TAT) in May 1994 confirmed the presence of the aforementioned constituents. The facility consists of one treatment cylinder, several sheds, six large above-ground storage tanks, and a cement block building. The grounds surrounding the facility consist mostly of gravel and soil. A expansive wooded area exists directly south and southeast of the facility. Salem Creek flows along the northwest side of the property. The site is located in a commercial area of Silas Creek Parkway directly behind a restaurant and adjacent to a lounge/bar. The Site is presently unrestricted to the public.

2. Physical Location

The Sherwood Treating Company Site occupies a five-acre area at 1660 Silas Creek Parkway in Winston-Salem, Forsyth County, North Carolina. Salem Creek is located within 100 feet of the site. This creek receives runoff from the facility during wet weather. Downstream sediments were reportedly contaminated with site-related BNAs.

3. Site Characteristics

The facility includes a small office building, an abandoned kiln building, and a wood treatment area, consisting of a treatment cylinder, a drip pad, and above ground storage tanks. The Sherwood Treating Company Site was operated from 1954 to 1990 to treat wood with FCAP and CCA solutions. When the facility was in full operation, wood products were received onsite and held north of the drip pad on a gravel parking area. The wood was then moved to the treatment cylinder where it was treated with 1% CCA solution. Concentrated CCA was stored in a 500 gallon above ground storage tank. The solution was mixed in a work tank with water prior to being used to treat the wood. In the treatment cylinder, the CCA solution was pushed into the wood by pressure, and vacuumed out of the wood until dry. Approximately 3.5 gallons of CCA solution was needed for every cubic foot of wood. The remaining CCA solution was recycled into a work tank equipped with three 9,000 gallon capacity compartments. Prior to 1970, a FCAP solution was used on the site.

Recycled FCAP was stored in three, 9,000 gallon above-ground storage tanks. Approximately 7,000 to 8,000 cubic feet of board was treated per day when the facility was in operation. After the wood was treated in the treatment cylinder, it was allowed to air dry on the drip pad for 24 to 48 hours. The treated wood was then stored on the gravel parking lot until it was sold and transported offsite.

The facility has been inactive for approximately three years. According to preliminary assessments of existing records, the owner has been deceased for almost three years. There may or may not be existing stockholders associated with the corporation. USEPA Region 4 Cost Recovery personnel will perform a title search during the week of September 19, 1994 to gather any available information relating to site ownership and the viability of Potentially Responsible Parties (PRPs) in cleaning up the facility.

4. Release or threatened release into the environment of a of a hazardous substance, pollutant or contaminant

Data confirms that the release of hazardous substances occurred at the site. Additionally, site conditions are such that there is a significant threat of continued or future releases from the site.

Analytical results of soil samples collected by EPA in May 1994 revealed elevated levels of chromium, arsenic, and pentachlorophenol (Table I Ref. 1). Chromium levels in the soils ranged between 4,840 ppm and 30.9 ppm. Additionally, concentrations of arsenic in soils varied between 4,140 ppm and 321 ppm.

Site screening investigation results performed by the State of North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR) in August 1991 identified similar contaminates of concern in the soils, as well as ground water impacts (Table II Ref. 2).

5. NPL Status

The site is not currently on the NPL, nor has it been proposed for listing.

TABLE I

SHERWOOD TREATING SITE
ANALYTICAL DATA

SOIL SAMPLES

ORGANIC COMPOUNDS (ug/kg)

SAMPLE ID	ST-1	ST-2	ST-3	ST-4	ST-5	ST-6
LOCATION	End of Treatment Cylinder	Near Treatment Cylinder	Collected Around Tanks	Gravel Parking Lot	Gravel Parking Lot	Gravel Parking Lot
Benzo (b) fluoranthene	N/D	N/D	N/D	N/D	N/D	N/D
Fluoranthene	N/D	N/D	N/D	N/D	N/D	N/D
Fluorene	N/D	N/D	N/D	N/D	N/D	N/D
Pyrene	N/D	N/D	N/D	N/D	N/D	N/D
Pentachlorophenol	N/D	N/D	N/D	N/D	N/D	5900

SAMPLE ID	ST-7	ST-8	ST-9	ST-10	ST-11	LB
LOCATION	Near 500 Gallon Tank	Inside Back Bldg	Outside Back Bldg	Grassy area under powerline	Gravel Parking Area	
Benzo (b) fluoranthene	N/D	N/D	N/D	560	N/D	N/D
Fluoranthene	N/D	N/D	N/D	1000	N/D	N/D
Fluorene	N/D	340	N/D	N/D	N/D	N/D
Pyrene	N/D	N/D	N/D	630	N/D	N/D
Pentachlorophenol	N/D	N/D	16.4	N/D	N/D	N/D

TABLE I (continued)

RCRA METALS (mg/kg)

SAMPLE ID	ST-1	ST-2	ST-3	ST-4	ST-5	ST-6
LOCATION	End of Treatment Cylinder	Near Treatment Cylinder	Collected Around Tanks	Gravel Parking Lot	Gravel Parking Lot	Gravel Parking Lot
Arsenic	3170	2030/1630	1430	321	1400	527
Barium	28.2	25.3/24.5	54.1	46.1	38.0	33.2
Cadmium	N/D	1.61/1.18	N/D	N/D	N/D	N/D
Chromium	2150	1520/1300	1140	370	1270	509
Lead	180	166/98.9	126	34.7	108	71.4
Mercury	0.34	0.44/0.37	0.57	N/D	N/D	N/D
Selenium	35.8	21.5/17.3	18.7	15.7	29.9	21.6

SAMPLE ID	ST-7	ST-8	ST-9	ST-10	ST-11	LB
LOCATION	Near 500 Gallon Tank	Inside Back Bldg	Outside Back Bldg	Grassy area under powerline	Gravel Parking Area	
Arsenic	1730	4140	1030	6.62	816/715	N/D
Barium	27.6	150	53.2	68.6	41.8/36.5	N/D
Cadmium	1.21	5.54	N/D	N/D	N/D	N/D
Chromium	1030	4840	770	30.9	742/643	N/D
Lead	44.2	287	57.8	51.4	40.2/38.0	N/D
Mercury	N/D	N/D	0.48	N/D	N/D	N/D
Selenium	15.5	96.2	20.4	16.5	15.0/18.3	N/D

NOTES: E - Estimated value; the concentration was above the calibration range of the instruments.

N/D - Not Detected.

TABLE II

NCDEHNR DATA

August 1991

<u>Contaminant</u>	<u>SWTGW01</u> <u>(ppb)</u>	<u>SWTGW02</u> <u>(ppb)</u>	<u>SWTGW03</u> <u>(ppb)</u>	<u>MCLs</u> <u>(ppb)</u>	<u>NCMCLs</u> <u>(ppb)</u>	<u>SMCLs</u> <u>(ppb)</u>
aluminum	-	880000	276000	-	-	50/200
arsenic	-	-	47.9	-	50	-
barium	-	3860	1310	1000	5000	-
beryllium	-	79.0	22.5	1	-	-
calcium	-	33700	19500	-	-	-
chromium	-	3940	1010	100	50	-
cobalt	-	364	82.4	-	-	-
copper	923	912	450	1300	1000	-
iron	-	931000	227000	300	300	-
lead	15.0	353	149	50	-	-
magnesium	-	219000	48600	-	-	-
manganese	-	8890	2400	-	50	50
mercury	-	1.8	0.68	2	1.1	-
nickel	-	564	201	100	150	-
potassium	-	168000	28400	-	-	-
sodium	-	51600	15400	-	-	-
vanadium	-	1950	584	-	-	-
zinc	1080	2210	507	-	5000	5000

6. Maps, pictures, and other graphic representation

Maps and pictures can be made available upon request.

B. Other Actions to Date

1. Previous Actions

EPA (Site Assessment) was notified on August 27, 1991 by NCDEHNR about the Sherwood Treating Company Site. Only recently has the site been referred to ERRB. A site visit was conducted by ERRB on May 26, 1994. Analytical results associated with this visit were received on June 21, 1994. As a result of this, ERRB determined a time critical removal is warranted at this site.

2. Current Actions

None.

C. State and Local Authorities' roles

1. State and Local Actions to Date

On August 27, 1991, NCDEHNR personnel submitted the Phase II, Screening Site Investigation. On March 3, 1992, EPA Site Assessment personnel made the determination that the Site may pose a threat to the public health and/or the environment. EPA-ERRB conducted a site visit (including soil sampling) on May 26, 1994. NCDEHNR stated that State funds were unavailable due to the large scale of the required removal action at the Site.

2. Potential for Continued State/Local Response

It is unlikely that NCDEHNR or any other local agency has the required funds to take any future response actions at the site. However, EPA-ERRB staff will coordinate closely with state and local agencies to make them aware of any future activities.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE THE ENVIRONMENT AND STATUATORY REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

At the present time the site is not secure so as to prevent or minimize unauthorized entry and direct contact with contaminated soil. In fact, the access is readily available to all portions of the facility. A Chinese restaurant and night club/bar are very proximal to the site. Contaminated portions of the site are utilized as available parking areas for customers.

Ground-water samples from temporary wells installed on site in 1991 confirm elevated levels of chromium, copper, and arsenic. Chromium levels are noted to be above existing MCLs.

B. Threats to the Environment.

Releases of hazardous substances to the ground water beneath the facility and surface water leaving the site have been documented. Salem Creek is located approximately 100 feet northeast of the site. Salem Creek flows southwest to its confluence with Muddy Creek approximately 6.8 miles downsteam. Muddy Creek enters the Yadkin River approximately 13.2 miles downstream of the site. These streams are suitable for fish and wildlife propogation, secondary recreation, and other uses requiring waters of lower water quality. There are no surface water intakes for public water supplies within 15 miles of the Sherwood Treating Company Site.

Surface water within the vicinity of the site is used primarily for fishing and boating. The types of fish caught for human consumption include carp, catfish, sunfish, and suckers.

IV. ENDANGERMENT DETERMINATION

Actual releases or threatened releases of the hazardous substance from this site, if not addressed by implementing the the response action selected in in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

Soil remediation will be dependent upon the horizontal and vertical extent of contamination in the soil.

1. Proposed Action Description

The proposed actions will include the following:

- * Improve site security;
- * Demolition of buildings, tanks and other process equipment;
- * Determine the extent of contamination; and
- * Determine soil remediation options

2. Contribution to Remedial Performance

There is no remedial action currently associated with the site.

3. Description of Alternate Technologies

A complete evaluation of alternative technologies will be made prior to the disposal/treatment phase of this response. Dependent upon the concentrations of the soil contamination, possible alternatives could include solidification, chemical treatment, soil washing, or transportation and disposal at an approved hazardous waste facility.

4. EE/CA

The proposed removal is time a critical removal action which does not require an EE/CA.

5. ARARS

All hazardous substances, pollutants, or contaminants transferred off-site for treatment, storage, or disposal during a response action must be transferred to a facility operating in compliance with EPA's CERCLA off-site policy. Any other Federal or State ARARS identified during the removal action will be considered according to applicable and relevant criteria.

6. PROJECT SCHEDULE

If this Action Memorandum is approved by the Waste Management Director, the removal action will begin as soon as possible. The project will be completed in several phases. The first phase will be to secure the site plus post the site as to its risks. The next phase will be to determine the extent and degree of soil contamination. Impacted soils above pre-established clean up goals will then be excavated and stockpiled prior to selecting the final remedy.

B. Estimated Costs

<u>Extramural Costs</u>	<u>Current Ceiling</u>
Regional Allowance	\$1,300,000
TAT	\$175,000
ESD	\$100,000
SUBTOTAL	\$1,575,000
20% CONTINGENCY	\$315,000
TOTAL-EXTRAMURAL COSTS	\$1,890,000
 <u>Intramural Costs</u>	
DIRECT COST	\$35,000
INDIRECT COSTS	\$57,200
TOTAL-INTRAMURAL COSTS	\$92,200
TOTAL PROJECT CEILING	\$1,982,200

VI. EXPECTED CHANGE IN THE SITUATION SHOULD THE ACTION BE DELAYED OR NOT TAKEN

If action should be delayed or not taken, the risks posed to the public health or welfare and the environment will increase.

VII. OUTSTANDING POLICY ISSUES

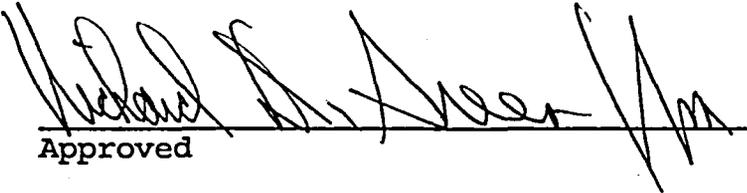
There are no outstanding policy issues at this time.

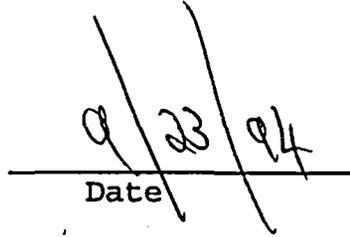
VIII. ENFORCEMENT

Reportedly, the former owner of the property, Kenneth Porter, has been deceased for approximately three years. According to preliminary records, there may be individual stockowners associated with the corporation. EPA-Region 4 Cost Recovery personnel will be travelling to the site to identify Potential Responsible Parties during the week of September 19, 1994. In the event that any viable PRPs are identified, EPA will notify them of any associated liabilities.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Sherwood Treating Company Site in Winston-Salem, North Carolina developed in accordance with CERCLA as amended, and is consistent with the NCP. Conditions at the site meet the NCP Section 300.415 (b) (2) criteria for a removal action and I recommend your approval of the proposed action. The total project ceiling, if approved, will be \$1,982,200. Of this, an estimated \$1,300,000 comes from the Regional removal allowance.


Approved


Date

Disapproved

Date

Joseph R. Franzmathes, Director
Waste Management Division

Attachment

REFERENCES

1. Analytical Report dated June 28, 1994. Roy F. Weston, Inc. Technical Assistance Team.
2. Letter dated August 27, 1991, from Harvey H. Allen, NCDEHNR, to Craig Benedikt, EPA, reporting Site Screening Investigation Reults, Sherwood Treating Company.