

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

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County (if not on report): Wake

Tarheel Wood Treating Company - Status of CCA and Creosote Contaminated Structures and Equipment

Location	Structure/Equipment	Status	Comments
Drip Pad	Drip Pad	<ul style="list-style-type: none"> - Pad was constructed in 1989. - Upgrades occurred in July 1994 to meet Subpart W requirements. - Facility stopped on-site treatment in late 2003. - In late 2006/early 2007, the drip pad was cleaned and covered with waterproof Duraweave (23 mil thick with 4 mil coating) cover. -At this time, facility cleaned the pad but did not test the rinsate for phased/clean closure. - Annual PE Certifications are completed. Weekly cleaning and drip pad inspection requirement has been waived due to the cover. The facility stores wood on top of the cover even though they have been cautioned to maintain the integrity of the cover. - Rainwater runoff from pad collected 2/22/2010 tested below Universal Treatment Standards for arsenic and chromium. 	<ul style="list-style-type: none"> - Drip pad is cleaned to the phased closure standards (below Universal Treatment Standards). Any rainwater off the drip pad does not have to be managed as listed hazardous waste as long as it has not passed through a unit or piping that is still contaminated with F035. - Any runoff water that does not touch an F035 contaminated unit or piping does not have to be managed as an F035 waste. However, other requirements (such as stormwater) may apply. - In order for the drip pad to be used for wood treating or to remain uncovered, repairs must be made in accordance with the annual engineer's certification. - The Duraweave cover was intended to be a temporary measure to keep rainwater off of the drip pad and not a permanent solution. - Drip pad has not been cleaned to the closure standards. This would require sampling of the soil around and under the drip pad to be completed.

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Location	Structure/Equipment	Status	Comments
In Tank Farm	<p>One 5,000-gallon tank for concentrated CCA</p> <p>Two 15,000-gallon work tanks contained diluted (50x dilution) CCA</p> <p>One 15,000-gallon tank used to accumulate rainwater from drip pad and sump</p>	<p>The tanks have been removed from the containment. During the March 13, 2012 CAV, Mr. Gallup stated that he hoped they would be able to start the cleaning the tanks in April/May 2012. To date, they have not been cleaned.</p> <p>Piping and pumps removed from tank farm containment area. Unknown if all pipes and pumps have been removed outside of the containment area.</p>	<p>During the April 10, 2014 site visit new tanks had been placed in the concrete containment. Request update on status of tanks (and size and function of tanks). May 2015 update: New bases (4) have been made for the new tanks and are being placed in the tank farm. The 5,000-gallon tank has been cleaned, but has not been tested. Testing will be done by June 15, 2015. The one 15,000-gallon tank has been scrapped clean and will be cut up and sold for scrap metal. The other two 15000 gallon work tanks have been cleaned. One will be cut up and sold for scrap metal, the other will now be tested by June 15, 2015 because it will have to be reused in the updated treatment process. The piping and pumps have been cleaned and will not be reused. They will be scrapped as well. All new pumps and piping has been purchased; August 2015 update: Rinsate tested below the Universal Treatment Standards for the 15,000-gallon and the 5,000-gallon tanks to be reused.</p> <p><u>October 2015 Updates:</u></p> <p>Two new 15,000-gallon tanks and two new bases installed in 3rd quarter 2015. New pumps on skid installed in 3rd quarter 2015.</p>
	<p>Piping and pumps to tanks</p> <p>Concrete Containment</p>	<p>All tanks, piping and pumps were removed from the containment. The area was rinsed, samples taken of the rinsate and the concrete was resurfaced with an epoxy coating. Samples taken 3/15/2011 showed rinse water from containment tested below Universal Treatment Standards for arsenic and chromium.</p>	<p>Containment is clean to phased closure standards (below Universal Treatment Standards). Any rainwater from this unit does not have to be managed as listed hazardous waste as long as it does not enter a unit or piping that is still contaminated with F035 prior to entering unit. However, other regulations may apply to runoff that is not F035 (e.g. stormwater requirements)</p>

Tarheel Wood Treating Company - Status of CCA and Creosote Contaminated Structures and Equipment

Location	Structure/Equipment	Status	Comments
Tank and Cylinder Building	Treatment Vessel (5 ft x 52 ft)	Used for CCA. Mr. Gallup stated they have not been cleaned out, but he was pricing out the clean out.	Funding from banks has not been obtained, so all work has to be done in house. Mr. Gallup has a temporary building measuring 26' by 46' that will cover the ends of the treatment vessels so cleaning can begin. The building will be finished within 60 days. Cleanout of vessel to be complete within 120 days. The five foot vessel will be sold as scrap and not be used in the new process.

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Treatment Vessel (6 ft x 62 ft)	Used for CCA. Mr. Gallup stated they have not been cleaned out, but he was pricing out the clean out. This vessel was removed from service in 2004.	Same as above, except the 6' vessel will be tested after cleaning is finished. August 2015 Update: Rinsate from treatment vessel tested below the Universal Treatment Standards.
2 Treatment Vessels (size unknown)	Mr. Gallup stated they have not been cleaned and have been used to store water.	Vessels will be sold for scrap metal in the future.
Sump and rail area for vessels	Status unknown	See above.
Other tanks in building	Mr. Gallup stated that the tanks held make up water for diluting the work solutions. These tanks have not been cleaned or sampled.	Tanks to be sold for scrap metal. Scrap prices are currently depressed so will need to wait until prices rise. January 1, 2016 Update: The 5,000-gallon tank was cleaned further after inspection rather than tested.
General		January 1, 2016 Update: In negotiations during last few months with a new bank. New budget submitted to new bank for review.

Action items facility must complete prior to restarting with wood treating process with non-hazardous wood treating solution (e.g. Micronized Copper Azole - MCA):

- 1) Test water used as make-up water in treating process to ensure it is not contaminated with chromium and arsenic.
- 2) Maintain / repair drip pad in accordance with annual report provided by engineer.
- 3) All CCA contaminated equipment (including but not limited to tanks/treatment vessels, sumps, secondary containment, troughs, piping and/or pumps) must be shown to be clean to phased closure standards (Universal Treatment Standards) or completely separated from the MCA treating operation. Any cross contamination with CCA contaminated water to the units that have been shown clean to phased closure standards will require the facility to repeat the phased closure cleaning and testing.
- 4) Start wood treating on-site using a non-hazardous treating solution such as MCA.