

ESCAMBIA WOOD TREATING
3910 North Palafox Avenue
Pensacola, Florida
County: Escambia
District: Northwest
Site Lead: EPA
Placed on National Priorities List: 12/1994
HWC# 111

Site Description and History

The Escambia Wood Treating Company (ETC) is located at 3910 Palafox Highway, northeast of the intersection of Fairfield Drive in Pensacola, Florida. The 26 acre site is situated in an area of mixed land use, bordered by a small residential community to the north, the CSX railway to the east, Palafox Drive to the west, and by numerous businesses in an area of mixed residential and industrial zoning to the south.

ETC operated from 1942 until 1982 as a manufacturer of treated wooden utility poles and foundation pilings. From 1942 until 1963, ETC used creosote in the wood treating process. In 1963, pentachlorophenol (PCP) was introduced to the process and was used exclusively from 1970 until the facility was closed in 1982. During operation, ETC discharged spent creosote and PCP-laden waste into unlined holding ponds on site.

Groundwater contamination at the site was discovered when elevated levels of naphthalene, phenols, and polynuclear aromatic hydrocarbons (PAHs), PCP, and other compounds associated with a wood preserving facility were detected in the groundwater at the nearby Agrico Superfund site in 1986. In 1988, the U.S. Environmental Protection Agency (EPA) completed a Resource Conservation and Recovery Act (RCRA) Facility Assessment which identified thirty-one solid waste management units (SWMUs) and two other areas of concern. Contained within these areas were several unlined surface impoundments, an unlined landfill, several wastewater treatment units, an abandoned laboratory, and a chemical and preservative storage area.

To reduce the imminent threat to groundwater and the risk of public exposure to contaminated soils, the EPA began the excavation of contaminated soils and sludge in October 1991 as an immediate, temporary means of source control. Excavation was completed in September 1992 after approximately 250,000 cubic yards of soil were placed in a lined vault and storm water controls were constructed.

Threat

Site investigation disclosed elevated levels of creosote, phenols and PAHs, and PCP in soils and groundwater. The presence of polychlorinated biphenyls (PCBs) in isolated soils was detected from several overturned electrical transformers found on site. Analysis of soils also revealed dioxins, a common impurity in commercial PCP.

Inhalation of fugitive dust emissions posed a significant threat to nearby workers and residents.

Groundwater contamination and surface water runoff from the ETC site poses a threat to Pensacola Bay located two miles southeast, and to Bayou Texar, an environmentally sensitive wetland area located 1.5 miles to the east.

The excavation and vaulted containment of contaminated sludge and soils on-site have reduced the threat of groundwater contamination by removing the source, and has reduced the risk of fugitive dust emissions and the possibility of surface water contamination. However, the on-site containment of the contaminated soils poses a significant risk until a permanent means of disposal is implemented.

Response Strategy and Status (May 2003)

During the spring and summer of 1991, the EPA conducted a site investigation. Based on the site investigation, the EPA implemented emergency response measures and began the excavation of contaminated soils in October 1991. Analysis of excavated soils indicated that excavation should proceed to the water table at a depth of 48 feet below land surface. Groundwater analysis revealed extensive contamination with PAHs and PCP. Excavation was completed in September 1992, after approximately 250,000 cubic yards of creosote, PCP and dioxin contaminated sludge and soils were excavated and placed in an on-site, lined vault. An estimated 50,000 cubic yards of contaminated soils still lies beneath the vault and in adjacent areas.

The EPA has selected Camp, Dresser & McKee Federal (CDM Federal) as the remedial cleanup contractor. In February 1995, CDM submitted a Remedial Investigation Work Plan. In June 1995, EPA nominated the ETC site as a National Relocation Evaluation Pilot site. In August 1995, the EPA Environmental Sampling Division (ESD) performed off-site sampling of the residential areas surrounding the site. The analytical data revealed several contaminants of concern above cleanup goals established for the site.

In November 1995, The EPA initiated the Remedial Investigation (RI) for the site. The Phase I RI was completed in October 1996. The Phase I RI Summary Report indicated that surface and subsurface soils contain elevated levels of PAHs at several locations on-site, and that the bulk of groundwater contamination is no longer present on-site (or is not present in the zones currently monitored). The report also recommended that existing data gaps be investigated during a Phase II RI.

The EPA released the Proposed Plan for Interim Action at the ETC site in April 1996, which proposed initially relocating 66 households, and evaluating the relocation of the remainder of the neighborhood between the ETC and Agrico Superfund sites. In August 1996, following continued evaluation and considering comments from FDEP and affected residents, the EPA issued an "Addendum to the April 1996 Superfund Proposed Plan Fact Sheet," which increased the number of residents requiring relocation to 101. In August 1996, a public meeting was held to discuss the EPA proposed relocation plan.

After full examination of the impacts to the nearby communities, and considering the adverse impacts to all closely situated residents due to potential remedial options, the EPA issued a statement in October 1996 stating that all 358 households around the ETC site would be relocated. The actual number of households to be relocated has been revised to 370 as a result of additional information.

The EPA issued its Interim Action Record of Decision (IAROD) for the interim remedial action at the ETC site in February 1997. The IAROD specifies the relocation of all 358 households from the surrounding residential communities. The FDEP issued its Letter of Concurrence with the IAROD in March 1997. The State Superfund Contract (SSC) between the State of Florida and the EPA for the Interim Action was signed on May 6, 1997.

The US Army Corps of Engineers (ACOE) opened an office near the site in Pensacola to handle relocation activities. The ACOE appraised residences, and located comparable properties in the Pensacola area. As of January 2002, ACOE has acquired 156 single-family homes, and all of the 200 tenant homes at the Escambia Arms apartments. However, 1 household is still awaiting suitable housing.

The Phase I RI/FS for source soils was completed, and the data reviewed. The EPA approved the Final RI/FS (June 1998) in September 1998. Several of the FDEP concerns, which were not addressed in the Phase I RI/FS, will be addressed in the RI/FS for Operable Unit 2 (OU 2).

The Draft Work Plan for the OU 2 RI/FS was submitted in March 1999. FDEP drafted comments following review in June 1999. FDEP submitted comments in October 1999 and November 1999 following review of the August 1999 Revised RI/FS for OU 2. The EPA submitted response comments in March 2000, and FDEP concurred with the comments. The EPA approved the RI/FS for OU 2 in April 2000.

Fieldwork for Phase 1, which focused on defining the outside extent of the groundwater plume to the east and southeast of the site, was completed in August 2000. The EPA contractor, CDM, submitted a Phase 1 Data Evaluation Report OU-2, which summarized the data from the Phase 1 fieldwork, in December 2000. Included in this data review is CDM's proposal of a Phase II field effort, which details the installation and sampling of additional wells to define the extent of the offsite contaminant plume and a sampling strategy for Bayou Texar.

EPA submitted the *Phase I Data Evaluation Report* in December 2000. FDEP reviewed the document and submitted comments in February 2001. A discussion of the FDEP comments took place in May 2001, with the EPA project manager and CDM. All of the Department's comments were adequately addressed, and the document was approved in June 2001.

EPA submitted the *Draft Sampling and Analysis Plan for Phase II* in April 2001. The FDEP provided comments in May 2001. The FDEP provided revised well locations for

the wells needed to delineate the plume. The FDEP also requested 2 well pairs to be installed on the east and west banks of Bayou Texar to monitor the plume migration into and across Bayou Texar. The final Sampling and Analysis Plan was approved in June 2001.

EPA is currently trying to release a proposed plan for the OU-1 source soils. The FDEP has commented numerous times on the dioxin cleanup levels. The Department has requested dioxin cleanup on-site to 30 ng/kg and off-site to 7 ng/kg where it cannot be managed through institutional or engineering controls. Also, the Department has requested that arsenic, vanadium, dieldrin and 2,4-dimethylphenol be added as contaminants of concern. EPA does not feel these contaminants are a result of a release from site operations.

In January 2002, CDM submitted a *Draft Screening Level Steps 1-3a Ecological Risk Assessment*. The FDEP reviewed the document and submitted comments in March 2002. FDEP is concerned that the document was prepared prematurely and that the sampling was inadequate to conclude there is no risk posed by ETC to Bayou Texar. CDM revised the document based on results from the August 2001 sampling event. FDEP reviewed the revisions and noted that none of the previous FDEP comments were addressed. FDEP, EPA, CATE, the City of Pensacola and Escambia County held a conference call in October 8, 2002 to discuss the issues. EPA agreed to table the revisions to the document, and obtaining of additional ecological assessment data, until CDM completes the Remedial Investigation for OU-2.

In May 2002, CDM submitted a *Draft Baseline Risk Assessment for Human Health*. FDEP reviewed the document and submitted comments in August 2002. FDEP's comments were received by EPA and were discussed in the October 8, 2002 conference call. FDEP was concerned that the well survey was not conducted. EPA agreed to table revisions to the document, and additional assessment work needed to complete the human health risk assessment, until CDM completes the Remedial Investigation for OU-2.

Also in May 2002, CDM submitted a *Draft Remedial Investigation for OU-2*. FDEP reviewed the document and submitted comments in September 2002. The document was inadequate and contained numerous data gaps. CATE requested a meeting in September 2002 to discuss their concerns with the document. EPA, FDEP, CATE, the City of Pensacola and Escambia County held a meeting September 13, 2002. EPA agreed that additional information was needed to revise the document but wanted to wait until they could review the FDEP comments. EPA submitted a response to FDEP comments in October 2002. The EPA and FDEP agreed that additional work would be required in order to define the horizontal and vertical extent of groundwater contamination.

In July 2002, CDM submitted a *Draft Feasibility Study Technical Memorandum*. FDEP reviewed the document and submitted comments in September 2002.

In May 2003, CDM submitted a Draft Final Sampling and Analysis Plan for Phase III of the Remedial Investigation detailing the new wells for installation and additional monitor

well sampling necessary to complete the delineation. The plan also outlines further investigatory procedures for Bayou Texar impacts as well as the well inventory survey. FDEP is currently reviewing the document.

Schedule

The FDEP is awaiting response to comments from EPA on the *Draft Feasibility Study Technical Memorandum*.

FDEP will submit comments on the Draft Final Sampling and Analysis Plan for Phase III.