

**DRAFT HAZARDOUS SOLID  
WASTE AMENDMENT (HSWA)  
PERMIT RENEWAL**

CAVENHAM FOREST INDUSTRIES, LLC  
GULFPORT, MISSISSIPPI

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- The HSWA permit along with the Mississippi Department of Environmental Quality (MDEQ) Post-Closure Permit constitutes the full Resource Conservation and Recovery Act (RCRA) permit for Cavenham Forest Industries, LLC.



# PROPOSED CHANGES TO THE HSWA PERMIT

- CAMU Deletion
- Financial Assurance Requirements
- Institutional Controls Matrix
- AOC 1 Dioxin Impacted Soils
- AOC 2 Turkey Creek
- AOC 3 Creosote Tank and Barge Slip Bernard Bayou
- AOC 4 Groundwater Outside Slurry Wall of SWMU #6



# Corrective Action Management Unit (CAMU)

- CAMU was a concrete pad and asphalt pad.
- The CAMU was used to remediate contaminated soils excavated onsite.
- Sampling soil around the concrete pad indicated no release.
- CAMU recommended for deletion from the HSWA Permit Renewal.



# FINANCIAL ASSURANCE (FA)

- Regulatory requirement for corrective action cleanup of SWMUs and AOCs.
- To make funds available for cleanup in case the owner/operator becomes bankrupt.
- Provide cost estimate for corrective action.
- Within 60 days shall submit FA for full cost of Corrective Action.
- Select financial assurance instruments from among those described in 40 C.F.R. §§ 264.143, 264.145 and 264.151.

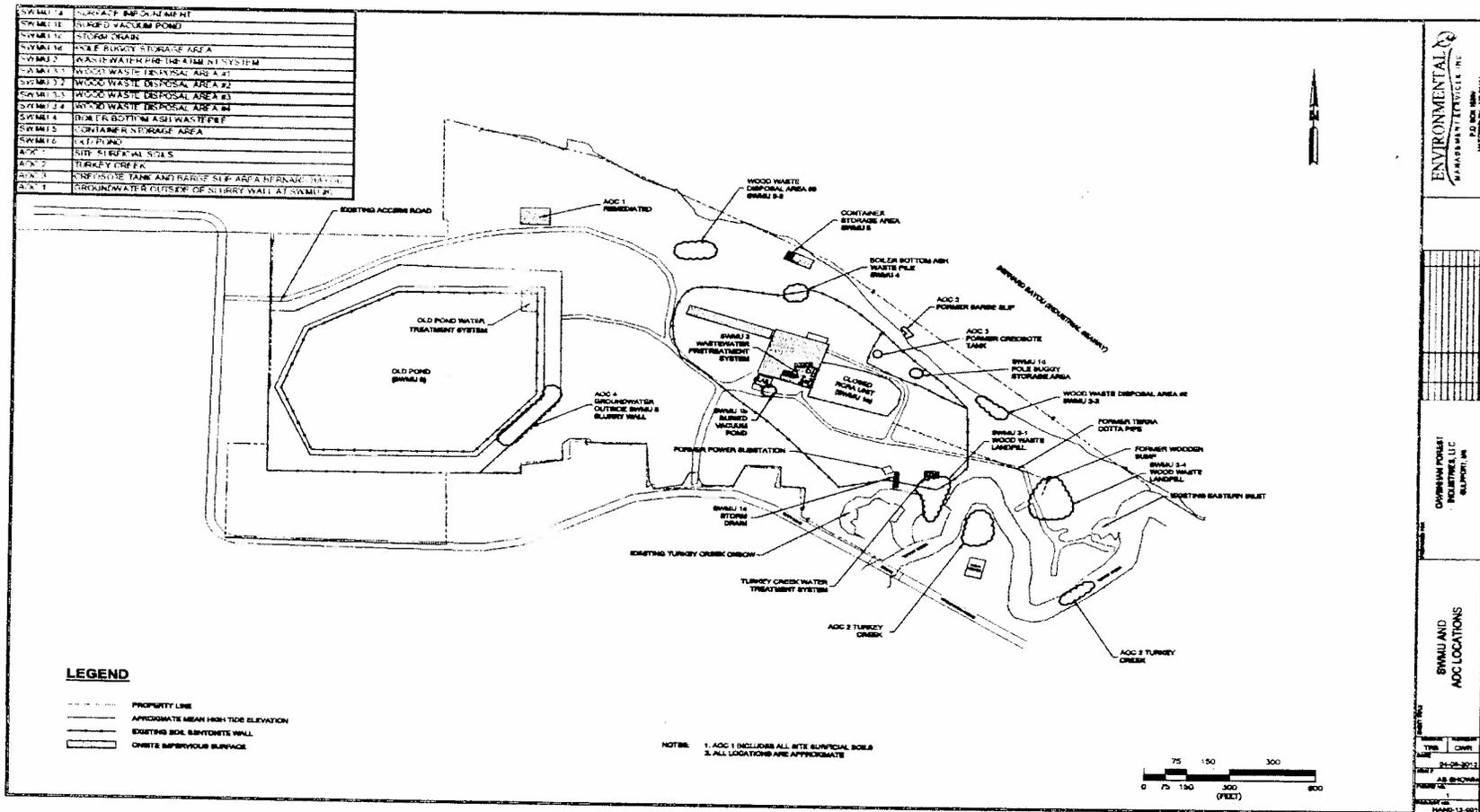


# INSTITUTIONAL CONTROLS (ICs)

- Permittee must consider institutional or other appropriate non-engineering controls for the protection of human health and the environment from contamination left in place at any SWMU or AOC.
- Among ICs is an environmental covenant pursuant to Mississippi Uniform Covenants Act (UECA).
- ICs apart of the final remedy shall survive the termination of the permit.
- ICs may be placed upon the Facility or any SWMU or AOC.

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- ICs may restrict the use of the property covered by the IC to commercial and/or industrial land use as defined or defined in the future by zoning ordinances of the city, county or any other local government entity with jurisdiction and authority to regulate land use at the property.
  - The HSWA permit contains a detailed list of ICs.

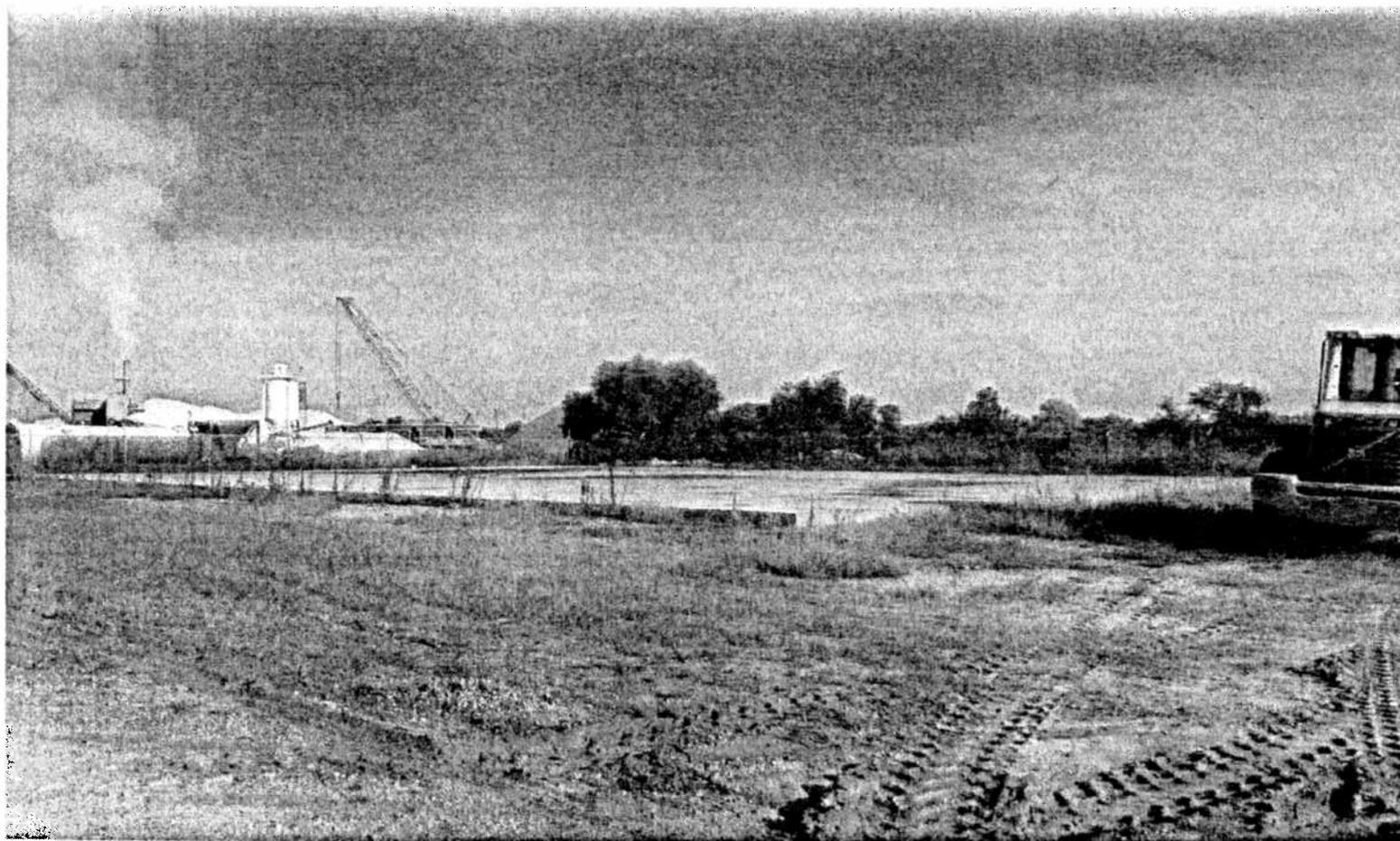
# CAVENHAM FOREST INDUSTRIES, LLC SITE MAP OF SWMUs AND AOCs



# AREA OF CONCERN (AOC) 1 DIOXIN IMPACTED SOILS

- Site-wide soil investigation detected dioxins in soil above residential cleanup levels of 1 ppb in a small area on the northwest side of the Facility.
- The Facility placed a concrete cap over the impacted soil as an interim measures.
- The cap measures 70 feet x 104 feet.

# AOC 1 DIOXIN IMPACTED SOIL



# AREA OF CONCERN (AOC) 2

## TURKEY CREEK

- RFI Investigation of Turkey Creek surface water and sediments detected polycyclic aromatic hydrocarbons (PAHs) from creosote and low levels of dioxin.
- Turkey Creek was designated as AOC 2 .
- Recent investigations detected PAHs in the top 6 inches of sediment above the ecological threshold of 1.684 mg/kg.
- The area of contamination is approximately 4,000 sqft.

# AOC 2 TURKEY CREEK

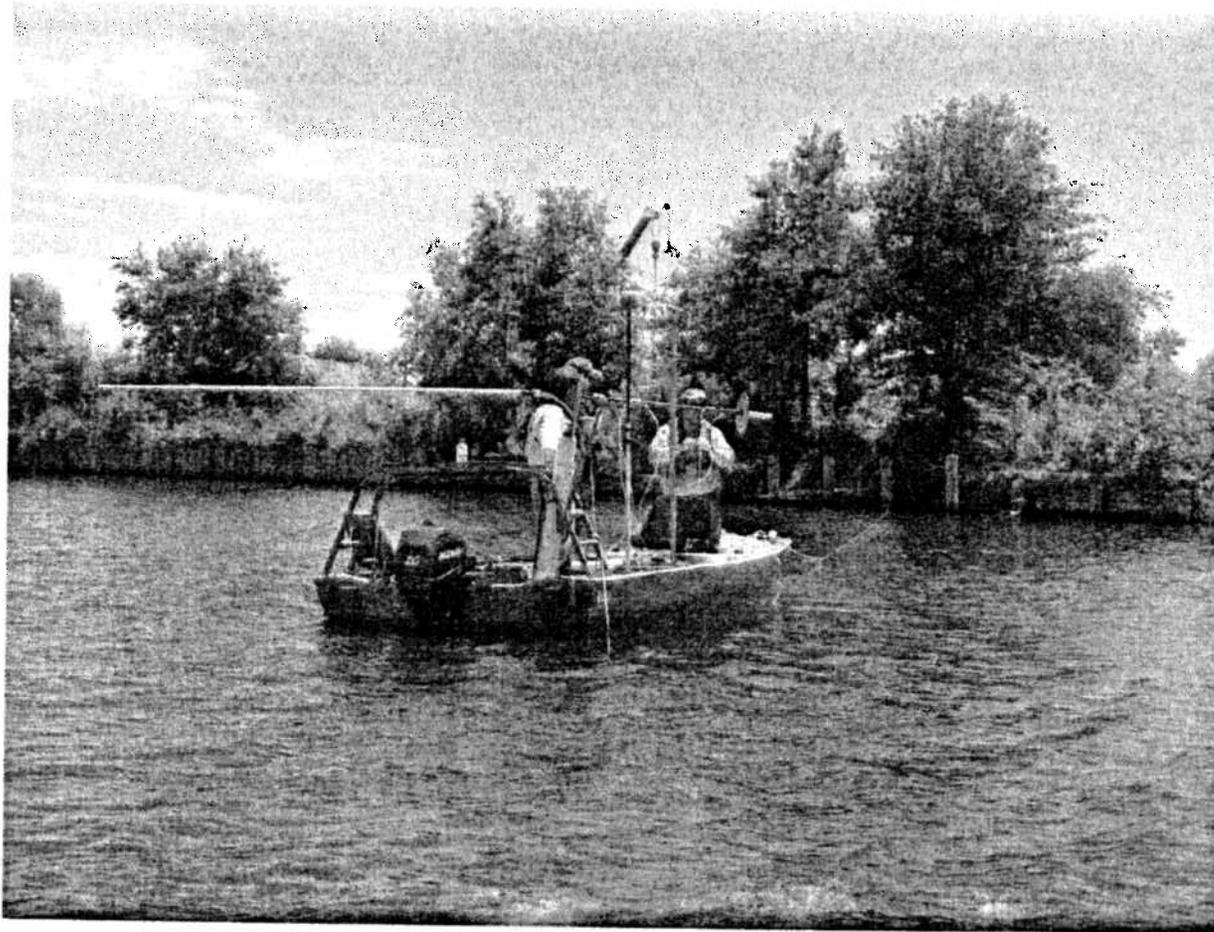


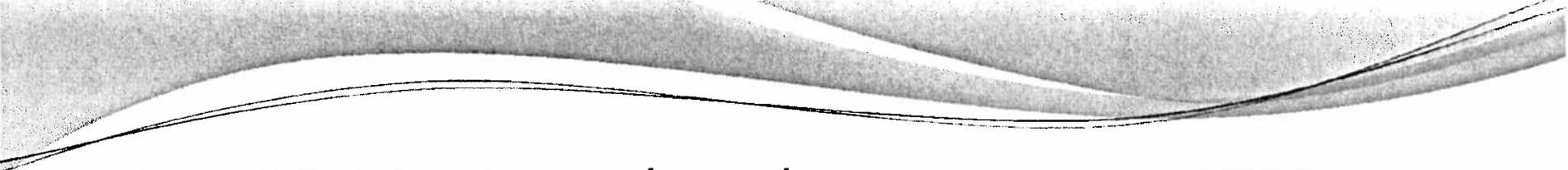


## AREA OF CONCERN (AOC) 3 CREOSOTE TANK AND BARGE SLIP AREA BERNARD BAYOU

- RCRA Facility Investigation (RFI) of sediments in Bernard Bayou detected Polycyclic Aromatic Hydrocarbons (PAHs) in layers of sediment.
- Source of PAHs may be from ditches or releases from offloading creosote into Bernard Bayou.

# AOC 3 CREOSOTE TANK AND BARGE SLIP AREA BERNARD BAYOU





## AREA OF CONCERN (AOC) 4 GROUNDWATER OUTSIDE OF SWMU 6 (OLD POND) SLURRY WALL

- Groundwater monitoring outside of slurry wall that surrounds SWMU 6 indicated groundwater contamination.
- The scope and extent of groundwater contamination has not been determined.

# AOC 4 GROUNDWATER OUTSIDE OF SWMU 6 (OLD POND) SLURRY WALL





# PUBLIC NOTICE

- The public is invited to submit comments and/or request a public meeting beginning on August 23, 2013, for the draft HSWA permit renewal. Please mail comments to James Smith, (404) 562-8502, at the USEPA Region 4 office at Atlanta Federal Center 61 Forsyth Street, Atlanta, Georgia 30303-8960 on or before midnight, October 7, 2013.
- All documents used to make tentative decisions are available for review at EPA's library at the Region 4 office in Atlanta, phone number 404-562-8114 or online at [http://www.epa.gov/region4/foiapages/readingroom/rcra\\_community/cavenham.html](http://www.epa.gov/region4/foiapages/readingroom/rcra_community/cavenham.html), and
- Mississippi Department of Environmental Quality (MDEQ) Office of Pollution Control, 515 East Amite Street, Jackson, Mississippi 39202, phone number (601) 961-5171, and the
- Orange Grove Public Library, 12135 Old HWY 49, Gulfport, Mississippi 39503, (228) 832-6924.