



Long-Term Stewardship Assessment Report

Appalachian Timber Services

EPA ID #: WVD063461958

525 East Stonewall Street Sutton, WV 26601

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Report Date: June 20, 2016

Introduction: Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in two fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background: Appalachian Timber Services (ATS or Facility) began wood treating operations in 1972 on an approximately 15-acre parcel, 1,200 feet downstream of the Sutton Dam in Braxton County. The land use in the area is mixed residential and light commercial.

Approximately ten years prior to such operations, a portion of the land now occupied by the Facility was used as a landfill for the disposal of municipal and household refuse. ATS treated wood with creosote or chromated copper arsenate (CCA) in wood treatment cylinders until July 1993. ATS ceased the CCA wood treatment portion of its operations on July 16, 1993, and the equipment used for CCA treatment was sold as scrap. Creosote treating operations continue at the facility.

ATS operated an unlined lagoon for the collection of contaminated groundwater produced until it was closed in 1979. Sludge contained in the lagoon was removed and placed in the Clay Encapsulated Disposal Area as part of the pre-RCRA closure plan. The closed lagoon was replaced with a clay-lined evaporation spray pond, which received wastewater effluent. In 1989, WVDEP issued a Post-closure Permit to monitor and treat contaminated groundwater in the vicinity of the RCRA closed spray pond. In 1990, pursuant to the Post-closure Permit, ATS installed a groundwater recovery system to remove free product (creosote). Groundwater at the Facility is contaminated with creosote constituents, BTEX, arsenic, and chromium.

On August 16, 1996, EPA issued a Statement of Basis which described and evaluated corrective measures alternatives to mitigate or eliminate hazardous contamination at the Facility. EPA's preliminary determination for the recommended measure was implemented via a Corrective Measures Implementation (CMI) Consent Order between EPA and ATS on September 30, 1996. The corrective measure for groundwater was to continue operating the existing groundwater pump and treat system and to install an additional monitoring well east of the clay encapsulated area. For soils, bioremediation, excavation and asphalt capping along with the installation of drip pads was the selected

alternative. In 2005, ATS completed the construction of an asphalt cap and concrete pads over the affected soil contaminated areas to prevent exposure to onsite workers or trespassers. Drip pads were also installed, at the opening of wood treating cylinders, to prevent further creosote contamination.

Current Site Status: EPA is the lead agency that provides oversight of RCRA Corrective Action activities at the Appalachian Timber site located in Sutton, WV.

EPA contracted with the U.S. Army Corps of Engineers to provide recommendations for improving the capture zone of the system. In 2008, ATS decided on increasing the existing evaporator on-site. Installation of the re-furbished evaporator was done in early 2010.

A silt fence and sediment controls have been installed upgradient of Outfall 003 to prevent runoff of Total Suspended Solids to the Elk River. Also, new roofs are currently being installed over the wood treatment operations area to help prevent creosote runoff. The Facility is active under continued use.

Long-term Stewardship Site Visit: On, May 25, 2015 EPA conducted a long-term stewardship site visit with ATS to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization	Email Address	Phone No.
John Hopkins	EPA	hopkins.john@epa.gov	215-814-3437
Mike Jacobi	EPA	jacobi.mike@epa.gov	215-814-3435
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Lisa Humphreys	US ACE	lisa.a.humphreys@usace.army.mil	304-399-5953
Dan Starks	US ACE	daniel.f.stark@usace.army.mil	Not Available
Roy Henderson	ATS	rhenderson@atstimber.com	304-765-7393
Rick Gibson	ATS	rgibson@atstimber.com	Not Available
Jonathan Carpenter	Thrasher	jcarpenter@thrashereng.com	304-343-7601
Dayton Carpenter	Thrasher	daytoncarpenter7@gmail.com	Not Available
Jeff Todd	Thrasher	jtodd@thrashereng.com	Not Available

Engineering Controls (ECs):

Clay Encapsulated Disposal Area and RCRA Closed Spray Pond (former surface impoundment):

The clay encapsulated area was intact and good condition. Rain water accumulating on top of the cap suggests that the clay layer is preventing precipitation from percolating downward through contaminated material into groundwater. However, much of the area could not be observed due to large piles of untreated wood on top the cap. The cap does not appear to have been impacted by the storage of wood on top of it.

The RCRA Closed Spray Pond was also partially covered with large piles of untreated wood. There did not appear to be any settling of the closed unit.

Asphalt Cap: The asphalt was in good condition, with no signs of cracking at the surface. Most of the area was clear of equipment, vehicles and buildings. The cap is effective in isolating contaminated soils and allows for reuse of the area. *EPA suggests marking corners of the contaminated soil area to help identify the area of asphalt to be maintained.*

Groundwater Dual Phase Extraction System: Quarterly O&M reports for the Dual Phase Extraction (DPE) system have been submitted to EPA on schedule. The reports include groundwater elevation levels, vacuum influence, vapor recovery measurements, groundwater recovery rates, air exhaust and untreated water effluent sample results. The DPE system was connected to well DPE-6 and pumping at about 0.6 gpm at the time of the site visit. Vacuum influence and groundwater drawdown values indicate that groundwater is under control. Monitoring wells and extraction well DPE-6 appeared to be in good condition.

Institutional Controls (ICs):

Informational Control: A deed notice was filed with Braxton County, West Virginia on April 3, 1987 notifying that the land has been used to manage hazardous wastes. A copy of the deed notice was obtained by EPA and will be uploaded to the ATS corrective action facility webpage.

Enforcement and Permitting tool: Requirements of the CMI Final Administrative Order on Consent have been satisfied at this time. All reports regarding progress, operation and maintenance of the DPE corrective measure have been submitted to EPA on schedule.

Financial Assurance: Financial assurance is not required.

Follow-up Activities: EPA recommends marking corners of asphalt cap and clay cap to help identify location.

Conclusion: No major EC/IC deficiencies have been identified. The current EC/IC have been implemented and are functional/maintained. EPA will continue to review quarterly O&M reports and follow-up with ATS on recommendations for identifying capped locations.

Attachments:

Picture 1: New treatment operations building

Picture 2: Drip Pads

Picture 3: Outfall 002

Picture 4: MW- 6

Picture 5: Former Surface Impoundment Area

Picture 6: Diesel Fuel Tank w/ containment and Hazardous Waste Storage Area

Picture 7: Dual Phase Extraction System

Picture 8: Groundwater Pumping Meter

Figure 1: Aerial Map of Appalachian Timber Services

Appendix A: Notice of Use of Land for Hazardous Waste Management



Picture 1: New treatment operations building



Picture 2: Drip Pads



Picture 3: Outfall 002



Picture 4: MW-6



Picture 5: Former Surface Impoundment Area



Picture 6: Diesel Fuel Tank w/ containment and Hazardous Waste Storage Area



Picture 7: Dual Phase Extraction System



Picture 8: Groundwater Pumping Meter

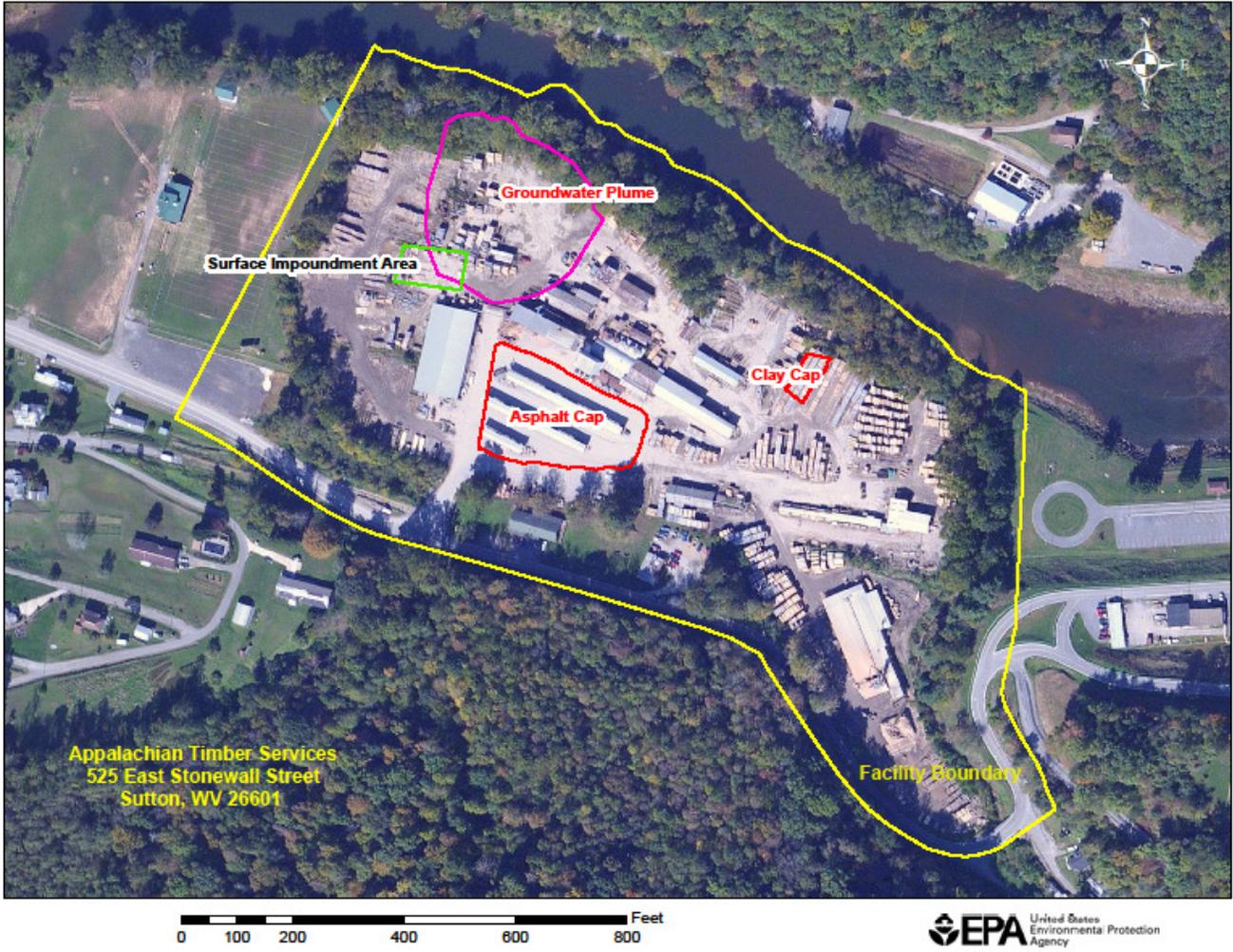


Figure 1: Aerial Map of Appalachian Timber Services

Appendix A

NOTICE OF USE OF LAND FOR HAZARDOUS
WASTE MANAGEMENT

Notice is hereby given that Braxton County Redevelopment Corporation is the owner of the land described in Exhibit "A" attached hereto and made a part hereof; that a facility for the chemical treatment of wood products is located on said land; that the land has been used to manage hazardous waste; that the use of such material is restricted under the provisions of the Resource Conservation and Recovery Act, as amended, 42 U. S. C. 6901, et seq., and the regulations promulgated thereunder including Section 8.06.07(c) of the West Virginia Administrative Regulations; and that there has been or will be filed with the Chief of the Division of Water Resources of the Department of Natural Resources a survey plat and record of the type, locations and quantity of hazardous wastes remaining after the closure of the existing spray pond at the facility.

DATED THIS 3rd DAY OF April, 1987.

BRAXTON COUNTY REDEVELOPMENT CORPORATION

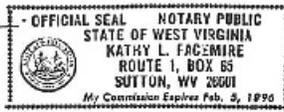
BY [Signature]
President Braxton C. Redevelopment

I hereby certify that the above individual has signed this instrument in my presence.

GIVEN UNDER MY HAND AND SEAL THIS 3 DAY OF April, 1987.

[Signature]
Notary Public

My commission expires Jan. 5, 1997
This document was prepared by: John Ball, Ph.D., P.E.
Ball Engineering Inc.
Box J. B.
University of AL 35486



That certain tract or parcel of land, situate on the South side of Elk River, partly outside and partly inside the corporate limits of the TOWN of SUTTON, containing Nine and Nine Tenths (9.9) acres, and being the same tract or parcel of land conveyed unto Earle Morrison by Earle Morreson, Jr., and Geraldine Morrison, his wife, by Deed dated December 27, 1956, and of record in the Office of the Clerk of the County Court of Braxton County, West Virginia, in Deed Book No. 257, at Page 144, the said Earle Morrison being now deceased, he having died testate, and he having devised said property to six of his children, namely Maurice B. Morrison, Kathleen Gillespie, Levoine Fleming, Anna Parker, Martha Brosius and Donel Morrison by his last Will and Testament which is dated November 13, 1963 and which Will was probated on October 26, 1964, and is of record in said Clerk's office in Will Book No. 9, at Page 663, which property is bounded and described as follows:

Being a tract or parcel of land originally containing 11 acres, more or less, less an outconveyance of 1-1/10 acres, situate on the South bank of Elk River near the "Y" of the Baltimore and Ohio Railroad, partly within and partly outside the corporate limits of the Town of Sutton, bounded on the North by Elk River, and on the West and South by the right of way line of said Baltimore and Ohio Railroad Company, being on or what was formerly the Camden land lying above the "Y" of said railroad and between said railroad and Elk River.

There is reserved and excepted from this tract of 11 acres, more or less, a certain tract or parcel of land conveyed by Earle Morrison, Jr., and wife, to the United States of America by Deed dated November 17, 1956, and of record in said Clerk's Office in Deed Book No. 255, at Page 406, the calls for said parcel of land by metes and bounds are as follows:

Beginning at a point in the north right of way boundary of the Baltimore and Ohio Railroad Company, 100 feet west of Buckeye Creek; thence leaving the said right of way boundary and severing the land of the subject owner, North $8^{\circ} 37$ minutes East 391 feet to a point just below the downstream end of Buckeye Island and common to the lands of Genevieve Corley, et al., and the subject owner; thence upstream with the meanders of the south channel around the said island and the line of the said Corley, South $54^{\circ} 30$ minutes E 201 feet; South $35^{\circ} 30$ minutes W 65 feet; South $43^{\circ} 15$ minutes East 55 feet, to a point in the line common to the lands of M. C. Crites; the said Corley, and the subject owner; thence leaving the land of the said Corley and with the land of the said Crites South $50^{\circ} 17$ minutes West 186.5 feet to a point of the mouth of Buckeye Creek; thence upstream with the meanders of said Creek, South $21^{\circ} 18$ minutes East 51.5 feet; South $4^{\circ} 16$ minutes East 23 feet to a point in the north right of way boundary of the said railroad; thence leaving the land of the said Crites and with the said right of way boundary, North $82^{\circ} 24$ minutes West 100 feet to the place of beginning.

BRAXTON COUNTY CLERK'S OFFICE

No 13182

4/3 19 87

Received from Appalachia Timber Service
Two And no/100

Dollars

Recording fee

\$ 2.00

JOHN D. JORDAN, Clerk

By: John D. Jordan clt