

**U.S. EPA HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA)  
FEDERAL CORRECTIVE ACTION PERMIT RENEWAL  
FACT SHEET**

**FACILITY:** Pine Belt Wood Preserving, Inc.  
Highway 15 South, Laurel, Mississippi  
EPA I.D. Number: MSD 991 277 195

**OWNER/OPERATOR:** Pine Belt Wood Preserving, Inc.

**I. INTRODUCTION**

This Fact Sheet is prepared for a federal draft permit developed by the U.S. Environmental Protection Agency (EPA) Region 4 pursuant to the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The EPA invites the public to review and comment on the draft HSWA Permit written for Pine Belt Wood Preserving, Inc. (hereafter called the “Permittee”), which owns and operates a facility located at Highway 15 South, Laurel, Mississippi (the Facility). The EPA I.D. Number for this Facility is MSD 991 277 195. This draft HSWA Permit renews the HSWA Permit originally issued on April 30, 1990, and administratively continued pursuant to 40 C.F.R. § 270.51.

In Mississippi, implementation of the environmental permitting regulations under RCRA is shared between the Mississippi Department of Environmental Quality (MDEQ) and the EPA. The State of Mississippi has been authorized by the EPA to issue permits for the operation, closure, and post-closure care of Hazardous Waste Management Units (HWMUs), while the EPA retains authority to issue permits requiring corrective action for releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). SWMUs are any units which have been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or was intended for the management of solid waste. AOCs are areas having a probable release to the environment of a hazardous waste or hazardous constituent which is not associated with a SWMU and is determined to pose a current or potential threat to human health or the environment.

The EPA HSWA Permit is a companion permit to the MDEQ-issued Post-Closure Permit issued in 2009 covering the post-closure care of the hazardous waste surface impoundment.

**II. REQUEST FOR PUBLIC COMMENTS**

The draft HSWA Permit, which is explained in Sections V through VII below, is subject to change based on information received as a result of public participation. Therefore, the EPA is soliciting all relevant information, including public comment, to ensure that the draft HSWA Permit complies with all state and federal regulations. Any and all comments are encouraged by the public. The forty-five (45) day public comment period begins on **October 1<sup>st</sup>**, and ends at midnight on **November 14<sup>th</sup>**. Persons wishing to comment on the draft HSWA Permit during the 45-day public notice and comment period are invited to submit comments in writing to:

Kevin Greaney  
 US EPA – Region 4  
 Atlanta Federal Center  
 61 Forsyth Street, SW  
 Atlanta, GA 30303  
 (404) 562-8568  
[greaney.kevin@epa.gov](mailto:greaney.kevin@epa.gov)

For additional information on the draft HSWA Permit and its requirements, the public is encouraged to review the Administrative Record for the draft HSWA Permit, which is available at the locations listed in Table 1 below.

| <b>Table 1. Locations for Administrative Record on the draft HSWA Permit</b>                                      |  |   |
|---|--|---|
| <b>Online</b>   | <b>Local*</b>  | <b>State</b>  |
| <a href="https://semspub.epa.gov/src/collection/04/AR66539">https://semspub.epa.gov/src/collection/04/AR66539</a> | Laurel-Jones County Library<br>530 Commerce Street<br>Laurel, MS 39440<br>(601) 428-4313<br>Hours:<br>Mon - Fri 9:00 a.m. to 3 p.m.<br>Documents available to review by appointment only. Call in advance to schedule an appointment.<br><br>Closed: Saturday and Sunday<br><br>*Availability of local repository could be limited due to local COVID-19 restrictions. | Mississippi Department of Environmental Quality<br>515 East Amite Street<br>Jackson, MS 39202<br>Hours:<br>Mon – Fri 8:00 a.m. to 5 p.m.<br><br>Contact Deidre Thompson to arrange for viewing files on record at the MDEQ.<br>Phone: (601) 961-5758<br>Email: <a href="mailto:dthompson@mdeq.ms.gov">dthompson@mdeq.ms.gov</a> |

### III. PUBLIC MEETING/HEARING

No public meeting is currently scheduled at this time, but the public can request a formal public hearing on the draft HSWA Permit. Such a request must be made in writing and must state the nature of the issues to be raised during a public hearing. Requests must be submitted to Kevin Greaney at the EPA address listed in Section II above and must be postmarked/sent by the deadline for the public comment period. If a public hearing is held, the time and place of the hearing will be published at least thirty (30) days prior to the hearing.

### IV. POST PUBLIC COMMENT PERIOD – FINAL DECISION

The EPA will not finalize its decision until after review of and response to all received written comments. After the EPA’s consideration of the public comments that are received, the comments will be summarized, and responses will be provided in a Response to Comments (RTC) document. The RTC document will be drafted after the conclusion of the public comment period and will be incorporated into the Administrative Record for the HSWA Permit. Issuance of the final permit will be in accordance with 40 C.F.R. § 124.15. All persons submitting comments will be notified of the EPA’s final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under 40 C.F.R. § 124.19. If no comments are received requesting a change in the draft permit, the final permit shall become effective immediately upon issuance.

## V. SUMMARY OF HSWA PERMIT

This draft HSWA Permit contains the following components:

➤ HSWA Permit Cover Page

The Cover Page cites authority for issuance of the HSWA Permit and establishes the term of the permit, which is ten (10) years.

➤ PART I. Standard Permit Conditions

Part I of the HSWA Permit sets forth standard conditions applicable to all hazardous waste management facilities (e.g., duty to comply, duty to allow access, etc.). Each Condition specifies the exact authority to require the Permittee's compliance with the Condition. Unless otherwise specified, all citations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 C.F.R.). Mississippi has incorporated these federal regulations by reference and they are part of the authorized Mississippi Hazardous Waste Program at 11 Miss. Admin. Code Pt. 3, Ch. 1.

➤ PART II. Corrective Action

Part II of the HSWA Permit sets forth the specific corrective action requirements with which the Permittee must comply to address releases from SWMUs and AOCs that have been identified at the Facility. Specifically, HSWA permits can require any of the following corrective action activities for any SWMUs or AOCs:

- **Confirmatory Sampling** to determine if a release has occurred.
- A **SWMU Assessment Report** to report and/or investigate a newly identified SWMU.
- **RCRA Facility Investigation** to determine the scope and extent of a release.
- **Interim Measures** to minimize or prevent further contamination or exposure while long-term remedies are evaluated.
- **Corrective Measures Study** to identify and evaluate potential remedial alternatives for the releases that have been identified at the Facility.
- A **Remedy** to implement corrective measures necessary for the protection of human health and the environment.

The authority to investigate/clean up contamination from SWMUs or AOCs extends to contamination on-site, as well as to contamination that has migrated off-site from the Facility.

## **VI. FACILITY BACKGROUND**

### Facility Description

The Facility, which consists of approximately 4.25 acres, is located in a light industrial area bounded to the south by a pulpwood yard, to the west by an inactive railroad line, to the east by undeveloped woodlands, and to the north by the Daphne Branch of the Tallahala Creek. Wood preserving operations began in 1970 under the ownership of J.M. Christian, using the preservative pentachlorophenol. In 1975, the Facility added the chromated copper arsenate (CCA) process. In June 1980, the Facility was purchased by Pine Belt Wood Preserving, Inc. Pine Belt discontinued the use of CCA in 1985 and ceased all Facility operations in 1989. Since that time, all process equipment and storage tanks have been removed from the site, and the Facility has no current operations. See Picture 1 (next page) for an aerial overview of the Facility.

The wood preservative operations at this Facility generated process waste waters that were treated for pentachlorophenol. The treatment of these waste waters produced bottom sediments contaminated with pentachlorophenol, which were managed in an on-site surface impoundment. This impoundment was classified as a Hazardous Waste Management Unit (HWMU) in 1980 and was closed with waste in-place in October 1987. MDEQ issued a RCRA permit for post-closure care of the impoundment in June 1988, which requires the operation and maintenance of a groundwater detection monitoring system. For several years, there have been no detectable releases of hazardous constituents to the groundwater from the closed surface impoundment.

Facility operations resulted in the release of hazardous constituents from Solid Waste Management Units and Areas of Concern (SWMUs and AOCs) which require corrective action. The Permittee is continuing to investigate releases from these units to groundwater, sediment, and surface water. The corrective action associated with these units is further discussed in the next section.

## **VII. REGULATORY HISTORY/SUMMARY OF CORRECTIVE ACTION REQUIREMENTS**

This draft HSWA Permit renewal is designed to update the existing HSWA Permit that was originally issued on April 30, 1990, and administratively continued pursuant to 40 C.F.R. § 270.51. Justifications for the currently required actions and decisions summarized below are contained in the Administrative Record for this draft HSWA Permit. See Table 1 above for where the Administrative Record can be viewed.

Similar to any HSWA Permit covering corrective action, the core of this draft HSWA Permit is the list of SWMUs and AOCs and the required investigation and cleanup activities. The 1988 RCRA Facility Assessment identified a total of 23 SWMUs and AOCs. Ultimately, there are two basic courses of action for identified SWMUs and AOCs:

- 1) A remedy (cleanup) is needed to protect human health and/or the environment; or
- 2) No further action is needed to protect human health and/or the environment.

Table 2 below lists all SWMUs and AOCs that have been identified, along with the corrective action history for each SWMU/AOC. If available, the final disposition of the SWMU/AOC is provided.



**Picture 1. Areal Picture of Pine Belt Wood Preserving, Inc.  
(Yellow Line denotes General Location of Property Boundary)**

Based on the 1988 RCRA Facility Assessment, a “no further action” (NFA) decision was been made for 4 of the 23 SWMUs in Table 2.


Based on the 1988 RCRA Facility Assessment, the initial 1990 HSWA Corrective Action Permit required a **RCRA Facility Investigation** for 18 SWMUs and AOCs. In 1991, the EPA conducted a Case Development Investigation/Evaluation (CDIE), which served as an Interim RCRA Facility Investigation. During the CDIE, EPA officials sampled surface and subsurface soils on site in a drainage ditch and off site in the Daphne Branch. The results showed that both the surface and the subsurface soils within the former process and storage areas of the wood treating facility were contaminated with chromium, arsenic, pentachlorophenol, polyaromatic hydrocarbons (PAHs), and dioxins.

In June 2002, groundwater sampling was conducted in two temporary groundwater monitoring wells, which showed PAHs and pentachlorophenol in the shallow perched groundwater zone. Consequently, the EPA imposed **Interim Measures** to require ongoing semi-annual groundwater sampling and surface water sampling in the Daphne Branch. The ongoing sampling has consistently shown exceedances of naphthalene and pentachlorophenol in the groundwater and of pentachlorophenol in the surface water. Additional **Interim Measures** imposed at that time included installation of an asphalt cap covering the former process area and the separate drip pad (SWMU 4); installation of security fencing encompassing the entire property; and establishment of a grass vegetative cover over the entire parcel.


In preparation for the forthcoming permit renewal, the EPA conducted another sampling event in March of

2019, which has indicated that site constituents have migrated off site to the north and continue to impact the Daphne Branch. Therefore, as a part of this HSWA Permit, the EPA is requiring additional **Interim Measures** as well as a joint **RCRA Facility Investigation** and **Corrective Measures Study** for 19 SWMUs to assess site contamination and to evaluate remedies to address sitewide contamination. SWMU 1, the closed surface impoundment, is a HWMU currently regulated under the MDEQ Post-Closure Permit. This SWMU was not incorporated into early investigations given its status in post-closure care, but will be incorporated into required investigations and remedy evaluation under this draft HSWA Permit.


**Interim Measures** imposed under this HSWA Permit include maintenance of previously installed caps covering the closed surface impoundment (SWMU 1) and the former process area and drip pad (SWMU 4); maintenance of the security fencing; maintenance of the grass vegetative cover; modification of the groundwater and surface water sampling schedule from semi-annual to annual; and implementation of an Environmental Covenant to require long-term stewardship and maintenance of corrective measures beyond the life of any regulatory permit. These **Interim Measures** proposed as part of this draft HSWA Permit are not considered a final **Remedy** but are intended to prevent exposure and minimize the spread of contamination until a final Remedy is selected. The final Remedy selection will be public noticed separately after careful consideration of Remedy alternatives that will be evaluated as a result of the joint **RCRA Facility Investigation** and **Corrective Measures Study**.

| Table 2. Identified SWMUs and AOCs and their Corrective Action History |  |  |                                       |                                  |   |  |   |                      |
|--|--|--|---------------------------------------|----------------------------------|---|--|---|----------------------|
| SWMU/<br>AOC<br>No.  | Unit Name                                  | Corrective Action Process History  |                                       |                                  |   |  | Final Permit Decision                                     |                      |
|  |  | RCRA<br>Facility<br>Assessment<br>(RFA)  | SWMU<br>Assessment<br>Report<br>(SAR) | Confirmatory<br>Sampling<br>(CS) | Interim Measures  | Joint RCRA<br>Facility<br>Investigation<br>(RFI)/Corrective<br>Measures Study<br>(CMS) | Impose<br>Remedy<br>(Cleanup)                             | No Further<br>Action |
|  |  |  |                                       |                                  |   |  | based on...   |                      |
| *1   | Closed<br>Surface<br>Impoundment           | 1988   |                                       |                                  | <p>1999: security fencing and vegetative cover site-wide; asphalt cap at SWMUs marked with an asterisk(*)</p> <p>2002 – ongoing: semi-annual surface water and groundwater sampling</p> <p>Interim Measures Imposed by 2020 Draft Permit: maintenance of security fencing, vegetative cover, and asphalt caps; modification of groundwater and surface water sampling; environmental covenant</p> | Imposed by 2020 Draft Permit   | To Be Determined; Corrective Action Process Still Ongoing |                      |
| 2  | Drainage<br>Ditch and<br>Pipe              |  |                                       |                                  |   |  |   |                      |
| 3  | Rubble Piles                               |  |                                       |                                  |   |  |   |                      |
| *4   | Drip Pad and<br>Sump                       |  |                                       |                                  |   |  |   |                      |
| *5   | CCA Process<br>Area                        |  |                                       |                                  |   |  |   |                      |
| *6   | CCA<br>Cylinder<br>Basin                   |  |                                       |                                  |   |  |   |                      |
| *9   | Pentachlorop<br>henol (PCP)<br>Sump        |  |                                       |                                  |   |  |   |                      |
| *10  | PCP Process<br>Area                        |  |                                       |                                  |   |  |   |                      |
| *11  | PCP Retort<br>Drip Area                    |  |                                       |                                  |   |  |   |                      |
| *12  | PCP Storage<br>Tank<br>Containment<br>Area |  |                                       |                                  |   |  |   |                      |
| *13  | Diesel Fuel<br>Fill Area                   |  |                                       |                                  |   |  |   |                      |



| Table 2. Identified SWMUs and AOCs and their Corrective Action History |  |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
|--|--|--|---------------------------------------|----------------------------------|--|--|--|----------------------|--|--|-----|--------------------------|
| SWMU/<br>AOC<br>No.  | Unit Name                                    | Corrective Action Process History  |                                       |                                  |  |  | Final Permit Decision  |                      |  |  |     |                          |
|  |  | RCRA<br>Facility<br>Assessment<br>(RFA)  | SWMU<br>Assessment<br>Report<br>(SAR) | Confirmatory<br>Sampling<br>(CS) | Interim Measures   | Joint RCRA<br>Facility<br>Investigation<br>(RFI)/Corrective<br>Measures Study<br>(CMS) | Impose<br>Remedy<br>(Cleanup)                                | No Further<br>Action |  |  |     |                          |
|  |  |  |                                       |                                  |  |  | based on...  |                      |  |  |     |                          |
| *14  | Motor Oil<br>Fill Area                       | 1988   |                                       |                                  | 1999: security fencing and<br>vegetative cover site-wide;<br>asphalt cap at SWMUs<br>marked with an asterisk(*)<br><br>2002 – ongoing: semi-<br>annual surface water and<br>groundwater sampling<br><br>Interim Measures Imposed<br>by 2020 Draft Permit:<br>maintenance of security<br>fencing, vegetative cover,<br>and asphalt caps;<br>modification of<br>groundwater and surface<br>water sampling;<br>environmental covenant | Imposed by 2020<br>Draft Permit  | To Be Determined; Corrective<br>Action Process Still Ongoing |                      |  |  |     |                          |
| *15  | /Hydraulic<br>Fluid Fill<br>Area             |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| *17  | Former-Bio<br>Treatment<br>Tanks             |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| *18  | Small<br>Lagoon                              |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 19   | Contaminated<br>Soil                         |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 21   | Low-lying<br>Run-off<br>Containment<br>Areas |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 22   | Treated<br>Lumber<br>Stockpiles              |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 23   | Former Spill<br>Areas                        |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 7  | Containment<br>Storage Area                  |  |                                       |                                  |  |  |  |                      |  |  | N/A | 1988 RFA/<br>1990 Permit |
| 8  | Trash Barrel                                 |  |                                       |                                  |  |  |  |                      |  |  |     |                          |
| 16   | Used<br>Absorbent<br>Boom Drum               |  |                                       |                                  |  |  |  |                      |  |  |     |                          |



| <b>Table 2. Identified SWMUs and AOCs and their Corrective Action History</b> |                            |  |                                       |                                  |                  |  |                               |                          |
|---|----------------------------|--|---------------------------------------|----------------------------------|------------------|--|-------------------------------|--------------------------|
| SWMU/<br>AOC<br>No.   | Unit Name                  | Corrective Action Process History  |                                       |                                  |                  |  | Final Permit Decision         |                          |
|   |                            | RCRA<br>Facility<br>Assessment<br>(RFA)  | SWMU<br>Assessment<br>Report<br>(SAR) | Confirmatory<br>Sampling<br>(CS) | Interim Measures | Joint RCRA<br>Facility<br>Investigation<br>(RFI)/Corrective<br>Measures Study<br>(CMS) | Impose<br>Remedy<br>(Cleanup) | No Further<br>Action     |
|   |                            | based on...  |                                       |                                  |                  |  |                               |                          |
| 20  | Former<br>Process<br>Tanks | 1988   |                                       |                                  |                  |  | N/A                           | 1988 RFA/<br>1990 Permit |

**Color Key:**

**Green:** This color identifies a corrective action decision documented in the draft HSWA Permit. A green shaded cell means the EPA has determined that no further action is needed at this time to protect human health or the environment.

**Yellow:** This color identifies a corrective action activity required by the draft HSWA Permit. A yellow shaded cell means further action is needed to determine whether additional action is needed to protect human health or the environment.