



RECORD OF DECISION

**MARION PRESSURE TREATING COMPANY
MARION, UNION PARISH, LOUISIANA**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6—SUPERFUND DIVISION**

JUNE 2002

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LIST OF ACRONYMS

AAEE	American Academy of Environmental Engineers
APC	Air pollution control
ARAR	Applicable or relevant and appropriate requirements
B(a)P	Benzo(a)pyrene
bgs	Below ground surface
BTU	British thermal units
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CLP	Contract Laboratory Program
COPC	Chemicals of potential concern
cy	Cubic yard
DCLGS	Department of Conservation, Louisiana Geological Survey
DNAPL	Dense nonaqueous-phase liquid
DVECO	Degree of Vulnerability Economic Status
DVMAV	Degree of Vulnerability Minority Status
E&E	Ecology and Environment, Inc.
EJ	Environmental justice
EPA	Environmental Protection Agency
ERA	Ecological risk assessment
ESD	Explanation of significant differences
ESI	Expanded site investigation
ft/ft	Foot per foot
FS	Feasibility study
FSP	Field sampling plan
GRA	General response action
HHRA	Human health risk assessment
HRW	Horizontal recovery wells
IASD	Inactive and Abandoned Sites Division
LAC	Louisiana Administrative Code
LDEQ	Louisiana Department of Environmental Quality
LDOTD	Louisiana Department of Transportation and Development
LDR	Land disposal restrictions
LPDES	Louisiana Pollutant Discharge Elimination System
LGP	Low-ground pressure
LTTD	Low-temperature thermal desorption
LSWR	Louisiana Solid Waste Regulations
MCL	Maximum contaminant level
mg/kg	Milligram per kilogram
mg/L	Milligrams per liter

LIST OF ACRONYMS (continued)

MPTC	Marion Pressure Treating Company
MSSL	Medium-specific screening level
NAA	No action alternative
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
OSHA	Occupational Safety and Health Administration
PAH	Polycyclic aromatic hydrocarbon
PCDD/PCD	Polychlorinated dibenzo-p-dioxin/polychlorinated dibenzofuran
PEL	Permissible exposure limits
PF	Population Factor
PFD	Process flow diagram
POTW	Public Owned Treatment Works
PPE	Personal protective equipment
PRG	Preliminary remediation goals
PVC	Polyvinyl chloride
RAC	Remedial Action Contract
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RECAP	Risk Evaluation/Corrective Action Program
RF	Radio frequency
RI	Remedial investigation
RI/FS	Remedial investigation/feasibility study
RME	Reasonable maximum exposure
ROD	Record of decision
SARA	Superfund Amendments and Reauthorization Act
SH	State Highway
SITE	Superfund Innovative Technology Evaluation
SLERA	Screening level ecological risk assessment
SOIL _{GW}	Soil concentration protective of ground water meeting ground water classification I by LDEQ
SOW	Statement of work
START	Superfund Technical Assessment and Response Team
STEL	Short-term exposure limits
SVE	Soil vapor extraction
SVOC	Semivolatile organic compound
TAL	Target analyte list
TAP	Toxic air pollutant
TAT	Technical Assistance Team
TBC	To be considered
Tetra Tech	Tetra Tech EM Inc.
TM	Technical memorandum
TWA	Time-weighted average

LIST OF ACRONYMS (continued)

USC	U.S. Code
USDA	U.S. Department of Agriculture
USDoD	U.S. Department of Defense
USDOT	U.S. Department of Transportation
USGS	U.S. Geological Survey
VRW	Vertical recovery wells
VOC	Volatile organic compound

EPA RECORD OF DECISION CONCURRENCE PAGE

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PART 1: DECLARATION

This section functions as an abstract and data certification sheet for the key information in the Record of Decision (ROD) and is the formal authorization signature page for the ROD.

A. SITE NAME AND LOCATION

The site is listed as Marion Pressure Treating in the U.S. Environmental Protection Agency (EPA) National Superfund Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database under the identification number LAD008473142. The site location is within the corporate limits of the town of Marion, in Union Parish, Louisiana. The site is also listed under the EPA Site Spill Identifier number 7Z, and under the Louisiana Department of Environmental Quality (LDEQ) Agency Interest (AI) number 1482.

B. STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedy for the Marion Pressure Treating Company site, in Marion, Union Parish, Louisiana, which was chosen in accordance with the Comprehensive, Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and, to the extent practicable, the National Oil and Hazardous Substance Pollution Contingency Plan (NCP). This decision is based on the Administrative Record file for this site.

The factual and legal basis for selecting the particular remedy of thermal desorption and recovery of dense nonaqueous-phase liquids (DNAPL) through excavation of contaminated soils and/or the installation of recovery trenches was presented in the proposed plan in September 2001. Specifically, the basis for the decision is presented under the Evaluation of Alternatives using the nine criteria established by EPA. The EPA, as the lead agency, has concurred with the proposed plan and the State of Louisiana, as the support agency, has concurred with the proposed plan and preferred or recommended remedial alternative or selected remedy.

The detailed analysis of alternatives is presented in the feasibility study (FS) report. The FS, the proposed plan, and above concurrence documents are contained in the Administrative Record file for this site.

C. ASSESSMENT OF SITE

The Remedial Investigation (RI) identified the existence of a release and/or threat of release of hazardous substances into the environment, as noted by the site surface soils, sediments on the drainage path of surface water streams (wetlands environment), and the ground water underlying portions of the site. The response action selected in this ROD is necessary to protect public health, welfare, and the environment from actual and threatened releases of hazardous substances into the environment.

D. DESCRIPTION OF SELECTED REMEDY

The selected remedy for this site is on-site thermal desorption and recovery of DNAPL through excavation of contaminated soils and/or the installation of recovery trenches. Other hazardous and nonhazardous debris will be disposed offsite at Resource Conservation and Recovery Act (RCRA) subtitle C and D permitted facilities.

1. CLEANUP STRATEGY

The site cleanup strategy consists of the excavation and treatment of contaminated soils on the surface of the site, and in areas near the drainage pathway of Big Creek Exposure Area 8. Treated soils will be used to backfill excavated areas, and the backfilled areas will be regraded and revegetated.

A second component of the cleanup strategy is the excavation and treatment of contaminated soils under or inside the consolidation areas, the backfilled surface impoundment, and some portions of the drainage pathway of Big Creek. These soils need treatment to prevent future leaching of contaminants and DNAPL into the ground water. The treated soils will be used to backfill excavated areas, and the backfilled areas will be regraded and revegetated.

A third component of the cleanup strategy is the recovery of DNAPL from areas outside the excavation boundaries of the consolidation area. This component will be further evaluated under the remedial design. If DNAPLs are found beyond the excavation boundaries, a recovery system will be designed and installed to collect these liquids and prevent their migration into the ground water. The component will include monitoring of the ground water and institutional controls to limit the access to the ground water near the site.

The cleanup strategy is estimated to be completed within two years, with the first two components implemented during the first year.

2. ADDRESSING PRINCIPAL THREAT WASTE.

The NCP establishes an expectation that EPA will use treatment to address the principal threats posed by a site wherever practicable (NCP §300.430(a)(1)(iii)(A)). Identifying principal threat wastes combines concepts of both hazard and risk. In general, principal threat wastes are those source materials considered to be highly toxic or highly mobile and generally cannot be contained in a reliable manner or would present a significant risk to human health or the environment should exposure occur.

Wastes that generally will be considered to constitute principal threats include, but are not limited to, the following:

- **Liquid source material**—free product in the subsurface (i.e., DNAPLs) containing contaminants of concern (generally excluding ground water).
- **Mobile source material**—surface soil or subsurface soil containing high concentrations of COCs that are (or potentially are) mobile due to leaching, surface runoff, or subsurface transport.

The creosote-contaminated soils/sediments in Big Creek Exposure Area 8 are considered to be “principal threat wastes” because the COCs are found at concentrations that pose a significant risk. According to the human health risk assessment (HHRA), the excess carcinogenic risk to an individual posed by these materials is upwards of one in ten thousand (4.7×10^{-4}). In other words, if the contaminated soils/sediments at Big Creek Exposure Area 8 are not remediated, as many as 4 out of every 10,000 individuals exposed to the soil could develop cancer as a result of that exposure.

Creosote-contaminated soils in the Consolidation Area and the backfilled impoundment area, and soils/sediments in Big Creek Exposure Area 8 are also considered to be “principal threat wastes” because they are source material leaching DNAPL into the ground water.

The selected response action addresses source materials constituting principal threats at the site by reducing the concentrations of chemicals in contaminated soils/sediments to levels not posing a significant or unacceptable risk to individuals who may use the site.

The selected response action addresses source materials constituting principal threats at the site by reducing the concentration of chemicals in contaminated deep soils to levels that are not likely to leach further contamination into the ground water, posing a significant or unacceptable risk to individuals who may drink the ground water on site.

E. STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, is cost-effective, and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable.

This remedy also satisfies the statutory preference for treatment as a principal element of the remedy (i.e., reduces the toxicity, mobility, or volume of hazardous substances, pollutants, or contaminants as a principal element through treatment).

Because this remedy will result in hazardous substances, pollutants, or contaminants remaining onsite above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years after initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

F. ROD DATA CERTIFICATION CHECKLIST

The following information is included in the Decision Summary section of this ROD. Additional information can be found in the Administrative Record file for this site.

- COCs and their respective concentrations.
- Baseline risk represented by the COCs.
- Cleanup levels established for COCs and the basis for these levels.
- How source materials constituting principal threats are addressed.
- Current and reasonably anticipated future land use assumptions and current and potential future beneficial uses of ground water used in the baseline risk assessment and ROD.
- Potential land and ground water use that will be available at the site as a result of the selected remedy.
- Estimated capital, annual operation and maintenance (O&M), and total present worth costs, discount rate, and the number of years over which the remedy cost estimates are projected.
- Key factor(s) that led to selecting the remedy (i.e., describe how the selected remedy provides the best balance of tradeoffs with respect to the balancing and modifying criteria, highlighting criteria key to the decision).

G. AUTHORIZING SIGNATURES

All CERCLA-funded or -authorized RODs are signed and dated by the Regional Administrator or the Assistant Administrator of the Office of Solid Waste and Emergency Response (OSWER) at EPA Headquarters (or by those to whom this signature authority has been delegated). In the case of EPA Region 6, authority is delegated to the Superfund Division Director.

PART 2: DECISION SUMMARY

The Decision Summary provides an overview of the site characteristics, alternatives evaluated, and the analysis of those options. It also identifies the selected remedy and explains how the remedy fulfills statutory and regulatory requirements.

A. SITE NAME, LOCATION, AND BRIEF DESCRIPTION

The site is listed as Marion Pressure Treating in the EPA National Superfund CERCLIS database under the identification number LAD008473142. The site location is within the corporate limits of the town of Marion, in Union Parish, Louisiana. Specifically, the site is located at 3583 Martin Luther King, Jr. Drive (State Highway 551) in Marion. The site is also known as the Marion Pressure Treating Company (MPTC) site.

The EPA is the lead agency for the remediation of this facility. The LDEQ is the support agency. Cleanup of this site will be conducted using the Superfund trust fund as the source of cleanup monies.

The site is an inactive or abandoned wood treating facility that used creosote in its treatment process. Although located in a predominately rural area, residential land use in the area exists. The site elevation is approximately 180 feet above mean sea level and is characterized by a generally flat, gently sloping ground surface. The MPTC originally occupied a 10-acre track of land. Currently, the site and areas of contamination extend over approximately 22 acres.

B. SITE HISTORY AND ENFORCEMENT ACTIVITIES

The MPTC site began operations November 1, 1964, and ceased operations on October 10, 1989, due to bankruptcy. From the beginning of operation, creosote was used exclusively for the wood-preserving operations. Creosote-contaminated process wastewater was generated during wood treatment and disposed of within an on-site, unlined surface impoundment from 1964 until 1985. Several RCRA inspections were conducted by the LDEQ in the 1980s and early 1990s. In particular, during the inspection conducted on September 30, 1992, LDEQ noted the facility was completely abandoned with no evidence of recent activity.

In 1995, the EPA Technical Assistance Team (TAT) conducted a Removal Site Assessment following a request by the LDEQ. This assessment, and subsequent more detailed site assessments conducted by the EPA TAT through 1995, indicated elevated levels of creosote in soil and sediment samples. A time-critical removal action to provide source control was completed by EPA in 1997. During this removal action, several site structures and tank contents were removed from the site. Sections of surface soil contaminated with creosote near the main facility operations area were consolidated into an area onsite.

In 1999, the site was proposed to the National Priorities List (NPL), and a Remedial Investigation/Feasibility Study (RI/FS) was initiated to define the nature and extent of contamination and to identify remedial alternatives to address the site's contamination

problems. The site was added to the NPL in February 2000. During the field investigation of the RI/FS, the EPA built a fence around the site to restrict access to areas where sampling and visual observations had shown the presence or potential presence of creosote-related contamination. The general site features and fenced portions of the site are shown on Figure 1.

C. COMMUNITY PARTICIPATION

During the remedy selection process, EPA has conducted a number of activities to meet public participation requirements in CERCLA and under the NCP. These activities include the production and mailing of several fact sheets during the RI/FS assessment and remedy selection process. Mailing lists have been developed, and availability sessions, open houses, and public meetings have been conducted in the Town of Marion.

A repository of information has been established in the Town of Marion, Louisiana, at the LDEQ offices in Baton Rouge, Louisiana, and the EPA offices in Dallas, Texas. Remedial alternatives were presented in a proposed plan made available to the public on September 5, 2001. At that time, a 30-day public comment period was initiated. With the proposed plan, invitation cards were sent to interested citizens on the site mailing list. Reminder cards, fact sheets, and newspaper ads (Monroe and Farmerville newspapers) were also placed at that time. On September 27, 2001, a public meeting was conducted. Representatives from the EPA and LDEQ answered questions about problems at the site and the remedial alternatives. A transcript of the meeting is included as Appendix B, and EPA's response to the comments received is included in the Responsiveness Summary, which is part of this ROD.

Interviews were conducted with several members of the community, and a Community Involvement Plan (CIP) or Community Relations Plan was developed and implemented. Copies of these plans, reports, fact sheets, invitation cards, and reminder cards have been added to the Administrative Record for this site, and the Administrative Record was made available to interested parties free of charge on computer disk.

D. SCOPE AND ROLE OF OPERABLE UNIT OR RESPONSE ACTION

As with many Superfund sites, the problems at the MPTC Site are complex. As a result, EPA has organized the work into two operable units (OUs):

- Operable Unit 1: Contamination of the on-site soils.
- Operable Unit 2: Removal of contamination from the ground water.

At Operable Unit 1, soils contaminated with high concentrations of organic compounds will be excavated and treated using a treatment technology known as thermal desorption. For this purpose, a temporary thermal desorption unit will be installed or built on site. The treated clean soils from this unit will be conditioned and treated as backfill. Activities associated with this operable unit include the removal of contaminated debris, its transportation to a hazardous waste permitted site under RCRA Subtitle C, and the removal of nonhazardous debris and its transportation to a nonhazardous waste permitted site under RCRA Subtitle D. The debris includes pieces of equipment and machinery scattered on site, abandoned metal sumps, tank trailers, pieces of treated wood, pieces of lumber, and other vegetation. Debris will also include demolition debris from abandoned and decayed structures that need to be removed to gain access to the areas of surface and subsurface contaminated soils.

The second operable unit addresses the contamination of the ground water aquifer. Ingestion of water extracted from this shallow aquifer near the former on-site surface impoundment poses

a potential risk to human health because (1) EPA's risk range was exceeded and (2) concentrations of contaminants were greater than the maximum contaminant levels for drinking water (as specified in the Safe Drinking Water Act). Free phase, DNAPL, or free creosote product has been noted in three monitoring wells in this area. Figure 2 shows the location of monitoring wells installed on site.

This second operable unit will be further investigated during the Remedial Design (RD) to define the vertical and horizontal extent of the free phase contamination. Based on the information gathered during the RD, the contaminated soils with DNAPL are likely to be excavated with the removal of contaminated soils comprising the first operable unit. If contaminated soils with DNAPL extend beyond the excavation areas, a recovery trench will be installed to recover this DNAPL or free phase liquids. Any recovered DNAPL will be transported offsite for disposal in a permitted RCRA Subtitle C facility. A ground water monitoring plan will be implemented to verify that contamination does not extend beyond currently defined areas. Institutional controls will also be implemented to restrict access to the shallow ground water of the Cockfield Aquifer on site.

At the conclusion of the remedial action, areas that have been excavated will be backfilled and re-vegetated; the site will be graded and the thermal desorption unit will be removed. Institutional controls will be implemented to limit access to the shallow ground water of the Cockfield Aquifer on site.

E. SITE CHARACTERISTICS

1. CONCEPTUAL SITE MODEL

A conceptual site model was developed during the RI/FS. From the site model, it was noted that heavily contaminated soils are spread on several on-site areas near the southeastern end of the site near Big Creek Exposure Area 8, and contaminated soils under the Consolidation Area and the former backfilled surface impoundment could leach free phase or DNAPL contamination into the ground water.

To eliminate the unacceptable risk that free phase or DNAPL contamination pose to human health, these free phase and contaminated soils need to be removed. Heavily contaminated soils that contribute to the production of DNAPL and free phase also need to be removed in order to comply with the State Regulations under the Louisiana Risk Evaluation Corrective Action Program (RECAP). Concentrations of organic contaminants in soils exceed the recommended protective values under RECAP and could leach contamination into the ground water.

In addition to unacceptable risks to human health via the ground water, the surface and subsurface soils also present unacceptable risk to potential future industrial workers or recreational visitors or trespassers to the site and unacceptable environmental or ecological risks.

2. OVERVIEW OF SITE CHARACTERISTICS.

The original site covered a 10-acre square lot. Site operations extended beyond the original 10 acres. Currently, the former operational areas and areas where contamination have migrated cover approximately 22 acres. While the site gently slopes to the east, south, and west, Big Creek borders the site to the east and south, while an unnamed tributary drains the site to the west. These drainage pathways are relatively flat and cover areas designated as wetlands.

During the removal activities, most contaminated soils were removed or consolidated in an area near the center of the site. This area is designated as the Consolidation Area and was covered with clean soil to prevent exposure of the contaminated soils to any site visitor or trespasser. During the RI/FS, the sampling strategy focused on establishing a sampling grid or strategy that confirmed the presence of the most contaminated soils in this Consolidation Area. The sampling strategy also verified no contamination beyond what had been defined as on site and was used to delineate an area to be fenced to prevent accidental access of trespassers and visitors into areas of contamination and unacceptable risks.

3. SOURCES OF CONTAMINATION

Through the RI/FS sampling, the known or suspected sources of contamination have been limited to the former Consolidation Area, the backfilled impoundment area, a few isolated surface soils areas identified through the grid sampling, and an area near Big Creek defined generally as Exposure Area 8. Figure 3 shows this exposure area, as well as other exposure areas identified through the RI/FS and HHRA process. The risk to the other subareas evaluated was found to be at acceptable levels.

4. TYPES OF CONTAMINATION

The type of contamination or affected media are the deep soils and sediments impregnated with polycyclic aromatic hydrocarbons (PAHs), which are the contaminants of concern (COC) for the site. The majority of contamination was found in the consolidation area and in the former backfilled impoundment area.

The site-specific COCs were evaluated for different site areas and media, such as the on-site surface soils, the Cockfield aquifer ground water, sediments in Big Creek, and the deep on-site soils that could leach contaminants into the ground water. These values are summarized from the HHRA RAGs Part D Tables and presented in the ROD as Tables 1, 2, 3 and 4.

F. CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

As part of the RI/FS, EPA conducted a baseline risk assessment to determine the current and future effects of contaminants on human health and the environment. Although Union Parish has no zoning plan for the area, the area adjacent to the site is residential. According to an assessment conducted by EPA and comments presented by town officials, the most likely future uses of the property would be as a park or for recreation. Furthermore, the anticipated future land uses for the unnamed tributary and Big Creek are for recreation.

The EPA developed cleanup objectives based on current and potential future site uses as industrial or recreational for the on-site areas and recreational for the Big Creek area.

G. SUMMARY OF SITE RISKS

The baseline human health and ecological risk assessment estimates risks that the site poses if no remedial action is taken on the site. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action. This section of the ROD summarizes the results of the baseline risk assessment for this site. The carcinogenic risk values and non-carcinogenic hazard index values from the HHRA are presented on the attached Tables 5 and 6.

1. HUMAN HEALTH RISKS

Carcinogenic Risk to Trespasser/Recreational Visitors.

The creosote-contaminated soils/sediments in Big Creek Exposure Area 8 are considered to be “principal threat wastes” because the COCs are found at concentrations that pose a significant risk. According to the HHRA, the excess carcinogenic risk to an individual (trespasser, or recreational visitor) posed by these materials is upwards of one in ten thousand (4.7×10^{-4}) (all on-site media, all routes). In other words, if the contaminated soils/sediments at Big Creek Exposure Area 8 are not remediated, as many as 4 out of every 10,000 individuals exposed to the soil could develop cancer.

Creosote-contaminated soils in the Consolidation Area and the backfilled impoundment area and soils/sediments in Big Creek Exposure Area 8 are also considered to be “principal threat wastes” because they are source materials leaching DNAPL into the ground water. Ground water was sampled at approximately 10 to 20 feet below ground surface (bgs). This ground water demonstrates capacities for meeting LDEQ’s Class 2 classification for potentially potable ground water. Ground water was also collected from the town's domestic water supply wells south of the site, and no contamination above screening levels (MCLs) was detected. The only exceedances of chemicals of potential concern were found in the monitoring wells installed in the shallow ground water near the former impoundment and the consolidation area where most of the creosote-related contamination remains.

Carcinogenic Risk to Industrial Workers

Ingestion of non-creosote-related (arsenic) and creosote-related (PAHs) contamination in the ground water, present as free phase or DNAPL in some on-site wells, can pose an excess carcinogenic risk to an individual (industrial worker) upwards of one in ten thousand (1.1×10^{-04}).

Non-Carcinogenic Risks

Consumption of crayfish trapped from Big Creek Exposure Area 8 could result in a non-cancer hazard index of 10 for a trespasser/recreational visitor. The ingestion of on-site shallow ground water could result in a non-cancer hazard index of 3.2 for an industrial worker. Values greater than 1 are considered an excess risk for non-carcinogenic health effects.

2. ECOLOGICAL RISKS

Ecological Risks (Non-Carcinogenic)

Aquatic receptors such as benthic invertebrates near Big Creek Exposure Area 8 are at risk due to PAH sediment concentrations that are acutely toxic to benthic infauna and epifauna. The PAHs at sediment stations in this area may adversely affect birds that forage at these locations only. The remediation of Big Creek Exposure Area 8, triggered by the human health carcinogenic unacceptable risk levels, will address removing these ecological risks.

3. BASIS FOR ACTION

The response action selected in this ROD is necessary to protect public health or welfare and the environment from actual or threatened releases of hazardous substances into the environment.

H. REMEDIAL ACTION OBJECTIVES

Remedial action objectives (RAO) provide a general description of what the cleanup will accomplish. These goals typically serve as the design basis for many of the remedial alternatives that are presented in the next section. The RAOs provide a basis for evaluating the cleanup options for the site and understanding how the risks identified in the previous section will be addressed by the response action.

The RAOs are “medium-specific” (for example, ground water or soil) or operable unit specific goals for protecting human health and the environment. Typically, for wood treater sites being addressed through the presumptive remedy approach, RAOs should be developed that will minimize the further release of contaminants from the soil, limit further spreading of subsurface DNAPL to off-site media, and reduce the quantity of source material present in the DNAPL zone. To accomplish these objectives, EPA recommends the use of treatment technologies to control principal threats and containment technologies to control low-level threats.

1. SPECIFIC RAOs

Section 121(d) of CERCLA, as amended by SARA (U.S. Code Title 42, Chapter 103, Subchapter I, Section 9621), requires, at the completion of the remedial action, a level or standard of control for such hazardous substance or pollutant or contaminant that at least attains such legally applicable or relevant and appropriate standard, requirement, criteria, or limitation (ARAR). The ARARs are derived from both Federal and state environmental facility siting laws. RCRA, the Clean Water Act, the Safe Drinking Water Act, the Clean Air Act, and their associated regulations are examples of Federal laws from which ARARs may be derived. State standards that may constitute ARARs are those applicable laws that are promulgated, substantive in nature, more stringent than Federal requirements, consistently applied, and identified by the state in a timely manner. In addition to the legally binding requirements established as ARARs, many Federal and state programs have developed criteria, advisories, guidelines, or proposed “to be considered” (TBC) standards.

During the RI, EPA requested the identification of ARARs from the LDEQ. The LDEQ responded by furnishing the ARARs that it considered applicable, which include:

- Louisiana Administrative Code (LAC) Title 33, Part 1X, 2
- Water Quality Regulations, Chapter 3; Part III
- Air Quality Regulations, Chapter 7, Part V
- Hazardous Waste and Hazardous Materials Regulations, Chapter 11
- RECAP, LAC 33:I, Chapter 13

Specifically, LDEQ requested that any proposed cleanup comply with the cleanup standards of RECAP. RECAP is not an ARAR as requested by the State, but can and will be considered as a TBC standard.

During the RI/FS, site-specific ground water protection preliminary remediation goals were calculated for the chemicals of potential concern (COPC) in sediments of Big Creek Exposure Area 8, surface on-site soils, and deep soils in the Consolidation Area. For ground water and drinking water, specific remediation levels were based on maximum contaminant levels (MCLs) as provided by State of Louisiana law. There are no Federal or State of Louisiana regulatory cleanup standards for soil. The State of Louisiana RECAP provides a methodology to help determine risk-based criteria for soil. As such, RECAP and the Texas Natural Resource

Conservation Commission Risk Reduction Program were used as guides to calculate the chemical-specific values for the unique soil conditions at the Site. The values are specifically listed on Table 7 of the MPTC FS and are presented as Table 7. The listed RECAP values correspond to Screening Standards (SS) for Soil and Groundwater. These values can be combined to yield a Benzo(a)Pyrene equivalent concentration of approximately 569 mg/kg. This concentration is above the water solubility value of these chemicals, and thus is indicative that free-phase or free product is present in the soils.

By removing/cleaning soils (deeper than two feet in source areas) to a much lower level of 26 mg/kg, Benzo(a)Pyrene or Benzo(a)Pyrene equivalent, the industrial cleanup action level, the ground water will be protected, source soils containing free phase or DNAPL will be removed and treated through the thermal desorption unit, and the area soils will be available for unlimited industrial or recreational use.

During the RI/FS, an HHRA and an ecological risk assessment (ERA) were completed for the MPTC site to establish the associated risks from contamination found at the site. Carcinogenic PAHs were evaluated on the basis of their toxicity expressed as B(a)P equivalents. The EPA Region 6 has determined that an action level for B(a)P equivalents of 26 mg/kg will be used for the industrial worker exposure, and 42 mg/kg will be used for recreational exposures—the two most likely uses of the MPTC site in the future. These EPA acceptable PAH concentrations were established on the basis of a site-specific analysis to determine concentrations to which contaminants should be reduced in order to ensure that the remaining excess cancer risk falls within EPA's target range 1×10^{-04} to 1×10^{-06} . Areas that exceed the recommended action level for B(a)P equivalents are shown on Figure 4.

2. BASIS AND RATIONALE FOR RAOs

The RAOs related to surface and subsurface soils are established to meet anticipated future land use of the site for industrial uses or recreational uses. Specific remediation levels or preliminary remediation goals (PRGs) were established based on the HHRA, the ecological risk assessment, and the site-specific recommendation provided by the EPA risk assessors.

The RAOs related to ground water have been established to meet anticipated potential future land use of the site and future use of the shallow ground water. Specific remediation levels were based on maximum contaminant levels (MCL) for drinking water. This is the recommended clean-up level for any site-related ground water contaminant. If no MCL is available, a remediation goal is to be calculated using equations found in the Louisiana Risk Evaluation/Corrective Action Program (RECAP) methodology.

3. HOW THE RAOs ADDRESS RISKS

The RAOs will address risks by:

- Treating soils that are above acceptable risk levels to prevent contact by receptors.
- Preventing further contamination of ground water by removing soil and sediment contaminant sources above acceptable levels and recovering DNAPL to the greatest extent possible.
- Monitoring the ground water to determine the effectiveness of the source removal.

The EPA began developing the concept of presumptive remedies in 1990 as a method for accelerating the remedial process at certain types of waste sites, including wood treaters. The presumptive remedy approach limits the number of candidate technologies for the remediation of soils, sediments, and sludges, thereby expediting the FS process. For wood treater sites, these technologies include bioremediation, thermal desorption, incineration, and immobilization.

In addition to the evaluation of wood treater presumptive remedies, presumptive response strategy and treatment technologies established for contaminated ground water at CERCLA sites for DNAPL and affected ground water have also been evaluated in accordance with EPA guidance. The presumptive responses strategy for sites containing DNAPL considers containment, source control, and reduction to the extent practicable. The presumptive ground water remedies must also restore ground water to its beneficial use wherever practicable. Ground water is not currently used on site or near the site; as such, only DNAPL General Response Actions (GRAs) and technologies require consideration.

The technologies evaluated in the FS and this ROD will meet PRGs, GRAs and RAOs.

I. DESCRIPTION OF ALTERNATIVES

The NCP allows the use of institutional controls to supplement engineering controls as appropriate for short- and long-term site management to prevent or limit exposure to site-related contamination (NCP Section 300.430 [a][i][iii][D]).

1. DESCRIPTION OF REMEDY COMPONENTS

Remediation of Contaminated Soils and Source Material.

Remedial action alternatives represent a directed application of feasible technologies toward areas of potential risk or site control. Remediation technologies and institutional controls were evaluated for application at the MPTC site. Of these, two treatment technologies (thermal desorption and incineration), two extraction technologies (extraction wells and extraction trenches), and one disposal technology (off-site landfilling) were retained for detailed analysis. These technologies were retained on the basis of their proven effectiveness, ease of technical implementability, and moderate cost. Institutional controls also were retained for detailed analysis. Property deed notices, fencing, and signs were the institutional measures considered during the FS, which is included in the Administrative Record.

Remediation of Contaminated Ground Water and DNAPL

Extraction and off-site incineration of DNAPL was retained as an applicable ground water remedy. The removal and off-site incineration of debris prohibited at landfills and off-site landfilling of non-prohibited debris was retained.

2. DESCRIPTION OF ALTERNATIVES

The alternatives developed are the following:

ALTERNATIVE I—NO ACTION ALTERNATIVE (NAA)

The NAA, required by the NCP (NCP§300.430 [e][6]), is the baseline alternative against which the effectiveness of all other remedial alternatives are judged. Under the NAA, no remedial actions will be conducted at the MPTC site or at the off-site areas. No further attempts will be made, beyond those already implemented, to control access to the site or other contaminated

areas. Uncontrolled surface-water runoff will continue to be released from both natural and constructed drainage. Subsurface DNAPL will continue to be a source for ground water contamination. No attempts will be made to monitor or control ground water contamination or DNAPL migration from the MPTC site.

ALTERNATIVE 2—EXCAVATION AND TREATMENT USING ON-SITE LOW-TEMPERATURE THERMAL DESORPTION (LTTD) WITH OFF-SITE DISPOSAL OF DEBRIS

Alternative 2 is the excavation and treatment of surface and subsurface contaminated soils and sediments using LTTD. A Process Flow Diagram of this technology can be seen on Figure 5. A conceptual site layout is shown on Figure 6. This alternative will remove potential sources of ground water contamination and meet the direct exposure PRG through soil removal, treatment, and backfilling on site. The ground water remediation is expected to take 117 weeks to complete. Contaminants desorbed from excavated soil in the thermal unit will be destroyed by thermal oxidation in the unit's air pollution control system. The treated soil will be conditioned and returned to the site as backfill. The actual type of thermal treatment system to be used, and the standards governing their operation, will be determined during the remedial design.

Nonhazardous debris will be removed from the site and deposited in a Subtitle D landfill. Hazardous debris prohibited in landfills will be removed from the site and incinerated. The site will be regraded and vegetated as appropriate.

During the LTTD remediation, a DNAPL recovery system will be installed, if required. The DNAPL pool has not been vertically or horizontally delineated. The configuration of the DNAPL recovery system will be determined during the RD after delineation has been completed. It is possible that subsurface DNAPL may be encountered when the soils are excavated from the Consolidation Area. If a system is required, it will be operated to recover the maximum volume of DNAPL possible with as little associated ground water as practical. For the purposes of the cost estimate, it has been estimated that the DNAPL recovery system will operate for a period of 10 years. Any ground water recovered would be treated using an on-site water treatment system with effluent discharged to surface drainage. Collected DNAPL will be transported off site for incineration. Ground water monitor wells will be installed, and a monitoring plan will be developed.

ALTERNATIVE 3—EXCAVATION, TRANSPORT, AND TREATMENT OF SOIL AND DEBRIS USING ON-SITE INCINERATION

Alternative 3 is the excavation and treatment of surface and subsurface contaminated soils, sediments, and hazardous debris using an on-site rotary kiln incinerator. A process diagram of this technology and equipment layout is shown on Figures 13 and 14 of the FS that is part of the Administrative Record. This alternative will remove the potential sources of ground water contamination and achieve the soil PRG through soil and sediment removal, treatment, and backfilling on site. Ash from the incinerator will be conditioned and returned to the site as backfill.

Nonhazardous debris will be removed from the site and deposited in a Subtitle D landfill. The site will be regraded and vegetated as appropriate.

A DNAPL recovery system will be installed as described in Alternative 2. On-site excavations will be backfilled with treated soil. A layer of topsoil will be placed over the treated soil, and the area will be seeded. Ground water monitor wells will be installed, and a monitoring plan will be developed.

ALTERNATIVE 4—EXCAVATION, TRANSPORT, AND TREATMENT USING AN OFF-SITE INCINERATOR WITH OFF-SITE LANDFILLING OF TREATED SOIL AND DEBRIS

Alternative 4 involves the excavation and treatment of surface and subsurface contaminated soils, sediments, and hazardous debris using an off-site rotary kiln incinerator. The site layout for this alternative is shown on Figure 15 of the FS that is part of the Administrative Record.

Nonhazardous debris will be removed from the site and deposited in a Subtitle D landfill. Hazardous debris that is prohibited at landfills will be removed from the site and incinerated off site. This alternative would reduce on-site contamination by removing it from the site, treating it, and relocating it to a secured landfill. Imported backfill would be used to backfill and regrade the site. The site would be revegetated as appropriate.

A DNAPL recovery system will be installed as described in Alternative 2. Ground water monitor wells will be installed and a monitoring plan will be developed as described in Alternative 2.

3. DESCRIPTION OF COMMON ELEMENTS FOR THE ALTERNATIVES

Alternatives 2, 3 and 4 require disposal of nonhazardous, on-site debris in a permitted RCRA Subtitle D disposal facility (landfill).

Alternatives 2, 3, and 4, require disposal of hazardous, on-site debris in a permitted RCRA Subtitle C disposal facility.

Alternatives 2, 3 and 4 consider installation of a DNAPL recovery system if needed. The need for this system will be further investigated during the RD.

Alternatives 2, 3, and 4 require installation of additional monitoring wells, development of a ground water monitoring plan, and implementation of the plan.

Alternatives 2, 3, and 4 require the use of institutional controls to limit access to ground water in the affected aquifer.

J. COMPARATIVE ANALYSIS OF ALTERNATIVES

Nine criteria are used to evaluate the different remediation alternatives individually and against each other in order to select a remedy. This section of the ROD profiles the relative performance of each alternative against the nine criteria, noting how it compares to the other options under consideration. The nine evaluation criteria are discussed below. The “Detailed Analysis of Alternatives” can be found in the FS that is included in the Administrative Record.

Criteria 1. Overall Protection of Human Health and the Environment

All of the alternatives except the “no action” alternative would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment, engineering controls and/or institutional controls. The COCs are treated to risk-based levels by Alternatives 2, 3, and 4. The alternatives provide protection by preventing direct contact exposure to contaminated soils and sediments, and prevent leakage or leaching of these contaminants to the ground water. All alternatives meet the RAOs. The ground water portion of the remedy reduces the source concentrations of contaminants to levels that will be protective of ground water. Thus it is considered protective.

Because the “no action” alternative is not protective of human health and the environment, it was eliminated from consideration under the remaining eight criteria.

Criteria 2. Compliance with ARARs

All soil/sediment alternatives would meet their respective ARARs or Federal and State laws. Alternatives 2, 3, and 4 require testing of the soils to ensure that residuals meet LDR standards prior to disposal.

Table 8 summarizes ARARs. Some of these ARARs might not be invoked depending on the final RD decisions for the Selected Remedy.

Criteria 3. Long-term Effectiveness and Permanence

Alternatives 2, 3, and 4 achieve long-term effectiveness and permanence by eliminating potential future exposure. Inherent hazards posed by the contaminants will be reduced below health-based levels.

The ground water alternative would be effective in the long term by reducing sources of contaminant concentrations in soil and the liquid DNAPL.

Ground water monitoring is recommended annually for 5 years, and every 5 years during the 5-year review thereafter (unless a concern is noted that would require the annual monitoring to continue) to ensure site-related contaminants are not migrating to the ground water aquifer.

Criteria 4. Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment

Alternatives 2, 3, and 4 achieve reduction in toxicity, mobility, and volume by treating media above land disposal restrictions and disposing of soil/sediment exceeding the PRGs.

The ground water remedy uses treatment after the recovery of the DNAPL to reduce toxicity, mobility and volume of the contaminants. The DNAPL will be thermally destroyed or recycled and managed in accordance with RCRA. After removal of the DNAPL, natural processes and monitored natural attenuation are used to achieve the same goals.

Criteria 5. Short-term Effectiveness

Alternatives 2 (on-site thermal desorption), 3 (on-site incineration), and 4 (off-site incineration) involve excavation of contaminated soils and thus present a potential for short-term exposure to construction workers. Alternatives 2 and 3 present short-term risk to the nearby residents and on-site workers due to the increased handling required for feed preparation and additional emissions from the on-site thermal activities to be performed. Alternative 4 would also present short-term risks to nearby residents and on-site workers with the additional activity associated with the excavation, staging, and transfer of contaminated soil/sediment to an off-site facility.

In the case of Alternatives 2 and 3, the treatment unit will be required to meet the RCRA emissions standards (i.e., RCRA Subpart X would apply to thermal desorption units and Subpart O would apply to incineration units).

The contaminants are not volatile, so the risk of release is principally limited to wind blown soil transport or surface water run off. Control of dust and run-off will limit the amount of materials that may migrate.

Precautions will be taken during construction of the DNAPL extraction wells or recovery trenches to eliminate any risk to the public from excavation. Because ground water remediation will occur after completion of soil remediation, air emissions during recovery well-drilling or trench installation should not constitute a threat. Short-term risk to workers associated with normal construction hazards will be eliminated through appropriate controls and adherence to proper health and safety protocols.

Criteria 6. Implementability

For Alternative 2, the technology required to excavate soil and perform thermal desorption is widely used, proven, and accepted, and the equipment and labor necessary to excavate the soil and sediment are conventional and readily available.

For Alternative 3, the technology required to excavate soil and perform incineration is widely used, proven, and accepted, and the equipment and labor necessary to excavate the soil and sediment are conventional and readily available.

For Alternative 4, the technology required to excavate soil and perform incineration is widely used and accepted, and the equipment and labor necessary to excavate the soil and sediment are conventional and available. Off-site commercial facilities to carry out the incineration are available.

Staging of the excavated soil may present a challenge due to limited available on-site area.

The ground water technologies are implementable without construction difficulties.

Criteria 7. Cost

The estimated present worth cost of Alternative 2 is less than 3 and 4. The time frame required to achieve final cleanup levels, approximately two years, is not excessive in any particular alternative.

Criteria 8. State/Support Agency Acceptance

The State of Louisiana supports Alternative 2, designated as the Preferred Alternative, without comment.

Officials from the Town of Marion support Alternative 2, designated as the Preferred Alternative in the Proposed Plan. The town's letter of support is included as a public comment to this ROD.

Criteria 9. Community Acceptance

Community acceptance of the preferred alternative was evaluated after the public comment period and is described in the responsiveness summary of the ROD.

K. PRINCIPAL THREAT WASTE

The creosote-contaminated soils/sediments in Big Creek Exposure Area 8 are considered to be "principal threat wastes" because the COCs are found at concentrations that pose a significant risk. According to the HHRA, the excess carcinogenic risk to an individual posed by these materials is upwards of one in ten thousand (4.7×10^{-4}). In other words, if the contaminated soils/sediments at Big Creek Exposure Area 8 are not remediated, as many as 4 out of every 10,000 individuals exposed to the soil could develop cancer as a result of that exposure.

Creosote-contaminated soils in the Consolidation Area and the backfilled impoundment area, and soils/sediments in Big Creek Exposure Area 8 are also considered to be “principal threat wastes” because they are source material leaching DNAPL into the ground water.

L. SELECTED REMEDY

1. DESCRIPTION OF THE SELECTED REMEDY

The selected remedy for cleaning up the MPTC Site is Alternative 2 (excavate wastes; on-site thermal desorption; off-site stabilization and disposal of residual wastes; back-fill excavated areas and re-vegetate). Areas where excavation is anticipated are shown on Figure 7.

2. SUMMARY OF THE RATIONALE FOR THE SELECTED REMEDY.

This soil alternative was selected over other alternatives because it will achieve a reduction of toxicity, mobility, and volume of contaminants through treatment. Alternative 2 is on-site thermal desorption with off-site disposal of nonhazardous debris in a subtitle D landfill, and hazardous debris will be incinerated at a permitted facility. Thermal desorption will achieve a reduction in the volume, toxicity, and mobility of creosote contaminated wastes.

The specific location of DNAPL will be further investigated during the RD and a recovery trench system will be designed, installed, and operated, if needed.

Monitoring wells, monitoring plans, and institutional controls will be implemented as described for this alternative.

3. SUMMARY OF ESTIMATED REMEDY COSTS.

The total cost for Alternative 2 is approximately \$22,088,337. Part of the funds will be used to prepare and establish the necessary infrastructure to support the alternative and maintain and operate the site over the life span of the alternative.

This amount includes estimated engineering design costs, annual water well sampling costs, and DNAPL recovery trench system O&M costs. The well sampling costs and recovery trench O&M costs were estimated and reported in the proposed plan as \$5,048,402. Implementation of the optimal location and the need for the recovery trench will be further evaluated during the RD.

The information in this cost estimate summary table is based on the best available information regarding the anticipated scope of the remedial alternative. Changes in the cost elements are likely to occur as a result of new information and data collected during the engineering design of the remedial alternative. Major changes may be documented in the form of a memorandum in the Administrative Record file, an explanation of significant differences (ESD), or a ROD amendment. This is an order-of-magnitude engineering cost estimate that is expected to be within +50 to -30 percent of the actual project cost.

A summary of estimated costs for this alternative is presented on Table 9.

4. EXPECTED OUTCOMES OF SELECTED REMEDY

Thermal desorption will permanently remove the wastes that pose a human health risk based on exposure, leaching potential to the ground water, and risk to ecological receptors. Alternative 2 will achieve permanent results and will only require monitoring or institutional controls to limit access to the ground water.

The expected outcome of the selected remedy is that the site will no longer present an unacceptable risk to human health because the contaminated soil and sediment will be excavated, treated, and used as backfill for the excavated areas. Other hazardous and nonhazardous debris currently on-site will be disposed off-site and the property will be suitable for industrial or recreational land use. In addition, institutional controls, such as the deed notice, will prevent future human exposure to on-site shallow ground water that may be affected by residual contamination. By addressing the unacceptable human health risks in the sediment contamination in the Big Creek, contamination that affects the wetlands and other habitat in the creek will also be addressed, thereby providing environmental and ecological benefits such as wetlands restoration. Ground water monitoring will ensure that the remedy is protective.

5. STATE PREFERENCE

Based on the information available at this time, EPA and the LDEQ, on behalf of the State of Louisiana, believe this alternative would be protective of human health and the environment, would comply with ARARs, and would be cost-effective. The selected alternative was presented as a Preferred Alternative in the Proposed Plan that went through public comments in September 2001.

The LDEQ has reviewed the various alternatives, the RI, HHRA, ERA, and the FS to determine if the selected remedy is in compliance with applicable or relevant and appropriate State environmental and facility siting laws and regulations. The State of Louisiana concurs with the selected remedy for the site (see the Administrative Record).

M. STATUTORY DETERMINATIONS

The Selected Remedy satisfies the statutory requirements and attains the mandates of CERCLA §121, and, to the extent practicable, the NCP.

1. STATUTORY REQUIREMENTS

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, is cost-effective, and utilizes permanent solutions and alternative treatment (source recovery) technologies to the maximum extent practicable.

2. STATUTORY PREFERENCE FOR TREATMENT

This remedy also satisfies the statutory preference for treatment as a principal element of the remedy (i.e., reduces the toxicity, mobility, or volume of hazardous substances, pollutants, or contaminants as a principal element through treatment).

3. FIVE-YEAR REVIEW REQUIREMENTS

Because this remedy will result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within 5 years after initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

N. DOCUMENTATION OF SIGNIFICANT CHANGES

To fulfill CERCLA §117(b) and NCP §§300.430(f)(5)(iii)(B) and 300.430(f)(3)(ii)(A), the ROD must document and discuss the reasons for any significant changes made to the selected remedy. The selected remedy is the preferred alternative identified in the proposed plan, and no significant changes have been made or were necessary in response to public comments.

PART 3: RESPONSIVENESS SUMMARY

The concerns of the community should be considered when selecting a remedial alternative. Much information has been exchanged with the area residents and community leaders concerning the MPTC site. The EPA held an Open House (September 4, 2001) and a Public Meeting (September 27, 2001) in Marion, Louisiana, to provide information to the public regarding cleanup activities. There is also an Administrative Record file at all information repositories that contain documents leading up to this Record of Decision. This Administrative Record file includes a transcript of the Public Meeting, which records answers to many public comments. These comments and any additional comments received during the comment period from September to October 2001 are summarized below:

A. STAKEHOLDER ISSUES AND EPA RESPONSES

- Q. What avenues have been taken to address the contamination once you found evidence of this contamination?
- A. We found that samples collected in area number 8 have creosote-related chemical compounds in quantities large enough to present a possible risk to people who may wander into this area. To address immediate possible risk, the site has been fenced while permanent solutions are investigated, designed, and implemented.
- Q. I have relatives that live in the area, and they wanted to know how the cleanup process will be conducted.
- A. Any contaminated soil will be cleaned using a thermal desorber, which heats the soil to eliminate the contamination. Any debris, such as treated wood or trash on site, will be removed from the site and taken to a landfill facility, which will retain this type of waste. If trenches or recovery wells may be used to collect this liquid creosote. The collected product will then be sent to an approved disposal facility. At the end of the clean-up process, the site will be suitable for industrial and recreational uses.
- Q. After studying the proposed plans for the cleanup of the Marion Pressure Treating Industrial Site, it is our belief that the proposed plan (S2) is the best course of action. We feel that this plan will meet the Town of Marion's expectations of having the site clean and safe for the residents of Marion and its further uses (letter from the Town of Marion).
- A. EPA welcomes public input on its decision making process and appreciates the support of the community in moving forward with Alternative S2.

APPENDIX A

ADMINISTRATIVE RECORD INDEX AND GUIDANCE DOCUMENTS

Prepared for
United States Environmental Protection Agency
Region 6
FINAL
ADMINISTRATIVE RECORD INDEX
for
MARION PRESSURE TREATING COMPANY
SUPERFUND SITE

EPA ID No. LAD008473142

ESS II
Task Order No. 083-017

Bartolome J. Cañellas
Remedial Project Manager
U.S. EPA Region 6

Prepared by:
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750 N. St. Paul Street, Suite 600
Dallas, Texas 75201

May 2, 2002

PREAMBLE

The purpose of this document is to provide the public with an index to the Administrative Record File (AR File) for the U.S. Environmental Protection Agency's (EPA) Proposed Plan to respond to conditions at the Marion Pressure Treating Company Superfund site (the "Site"). EPA's action is authorized by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9601 et seq.

Section 113(j)(1) of CERCLA, 42 U.S.C. Section 9613(j)(1), provides that judicial review of the adequacy of a CERCLA response action shall be limited to the Administrative Record (AR). Section 113(k)(1) of CERCLA, 42 U.S.C. Section 9613(k)(1), requires the EPA to establish an AR upon which it shall base the selection of its remedial actions. As the EPA decides what to do at the site of a release of hazardous substances, it compiles documents concerning the site and its decision into an "AR File." This means that documents may be added to the AR File from time to time. After the EPA Regional Administrator or the Administrator's delegate signs the Action Memorandum or the Record of Decision memorializing the selection of the action, the documents which form the basis for the selection of the response action are then known as the Administrative Record "AR."

Section 113(k)(1) of CERCLA requires the EPA to make the AR File available to the public at or near the site of the response action. Accordingly, the EPA has established a repository where the AR File may be reviewed near the Site at:

City Hall
398 Main Street
Marion, La. 71260
(318) 292 - 4715

The public also may review the AR File at the EPA Region 6 office in Dallas, Texas, by contacting the Remedial Project Manager at the address listed below. The AR File is available for public review during normal business hours. The AR File is treated as a non-circulating reference document. Any document in the AR File may be photocopied according to the procedures used at the repository or at the EPA Region 6 office. This index and the AR File were compiled in accordance with the EPA's Final Guidance on Administrative Records for Selecting CERCLA Response Actions, Office of Solid Waste and Emergency Response (OSWER) Directive Number 9833.3A1 (December 3, 1990).

Documents listed as bibliographic sources for other documents in the AR File might not be listed separately in the index. Where a document is listed in the index but not located among the documents which the EPA has made available in the repository, the EPA may, upon request, include the document in the repository or make the document available for review at an alternate location. This applies to documents such as verified sampling data, chain of custody forms, guidance and policy documents, as well as voluminous site-specific reports. It does not apply to documents in EPA's confidential file. (Copies of guidance documents also can be obtained by calling the RCRA/Superfund/Title 3 Hotline at (800) 424-9346.) These requests should be addressed to:

Bartolome J. Cañellas (6SF-LP)
Remedial Project Manager
U.S. EPA Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
(214) 665-6662

The EPA response selection guidance compendium index has not been updated since March 22, 1991 (see CERCLA Administrative Records: First Update of the Compendium of Documents Used for Selecting CERCLA Response Actions [March 22, 1991]); accordingly, it is not included here. Moreover, based on resource considerations, the Region 6 Superfund Division Director has decided not to maintain a Region 6 compendium of response selection guidance. Instead, consistent with 40 CFR Section 300.805(a)(2) and 300.810(a)(2) and OSWER Directive No. 9833.3A-1 (page 37), the AR File Index includes listings of all guidance documents which may form a basis for the selection of the response action in question.

The documents included in the AR File index are arranged predominantly in chronological order. The AR File index helps locate and retrieve documents in the file. It also provides an overview of the response action history. The index includes the following information for each document:

- **Doc ID**- The document identifier number.
- **Date** - The date the document was published and/or released. "00/00/1001" means no date was recorded.
- **Pages** - Total number of printed pages in the document, including attachments.
- **Title** - Descriptive heading of the document.
- **Document Type** - General identification, (e.g. correspondence, Remedial Investigation Report, Record of Decision.)
- **Author** - Name of originator, and the name of the organization that the author is affiliated with. If either the originator name or the organization name is not identified, then the field is captured with the letters "N/A".
- **Addressee**- Name and affiliation of the addressee. If either the originator name or the organization name is not identified, then the field is captured with the letters "N/A".

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 901141
Date: 10/01/1988
Pages: 35
Title: GUIDANCE FOR CONDUCTING REMEDIAL INVESTIGATIONS AND FEASIBILITY STUDIES UNDER CERCLA
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
Addressee:	N/A ,	N/A

Docid: 901287
Date: 09/01/1993
Pages: 8
Title: PRESUMPTIVE REMEDIES: POLICY AND PROCEDURES
Doc Type: FACTSHEET

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
Addressee:	N/A ,	N/A

Docid: 901289
Date: 12/01/1995
Pages: 61
Title: PRESUMPTIVE REMEDIES FOR SOILS, SEDIMENTS, AND SLUDGES AT WOOD TREATER SITES
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
Addressee:	N/A ,	N/A

Docid: 141240
Date: 08/22/1996
Pages: 24
Title: REQUEST FOR A REMOVAL ACTION AT THE MARION PRESSURE TREATING COMPANY SITE (DESCRIPTION: DOCUMENTS BIODEGRADATION STUDIES CONDUCTED)
Doc Type: ACTION MEMORANDUM

	<u>Name</u>	<u>Organization</u>
Author:	MARTIN , JOHN	U.S. EPA REGION 6
Addressee:	KNUDSON , MYRON O	U.S. ENVIRONMENTAL PROTECTION AGENCY

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 901290
Date: 10/01/1996
Pages: 39
Title: PRESUMPTIVE RESPONSE STRATEGY AND EX-SITU TREATMENT TECHNOLOGIES FOR CONTAMINATED GROUNDWATER AT CERCLA SITES, FINAL GUIDANCE
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A ,	N/A

Docid: 89119
Date: 06/10/1997
Pages: 4
Title: POLLUTION REPORT NUMBER 4 AND FINAL FOR THE MARION PRESSURE TREATING COMPANY SITE
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	FISHER , CHARLES	U.S. EPA
	<u>Name</u>	<u>Organization</u>
Addressee:	GAZDA , CHARLES A	U.S. ENVIRONMENTAL PROTECTION AGENCY

Docid: 901288
Date: 10/01/1997
Pages: 2
Title: A CITIZEN'S GUIDE TO UNDERSTANDING PRESUMPTIVE REMEDIES
Doc Type: FACTSHEET

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
	<u>Name</u>	<u>Organization</u>
Addressee:	NONE ,	N/A

Docid: 132165
Date: 12/06/1999
Pages: 4
Title: MARION PRESSURE TREATING SITE UPDATE: EPA PLANS INVESTIGATION FOR MARION PRESSURE TREATING SITE (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: FACTSHEET

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	PUBLIC

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FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145477
Date: 02/04/2000
Pages: 3
Title: MARION PRESSURE TREATING SITE UPDATE: SITE PLACED ON NATIONAL PRIORITIES LIST (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: FACTSHEET

	Name	Organization
Author:	N/A	U.S. EPA
	Name	Organization
Addressee:	N/A	PUBLIC

Docid: 136341
Date: 02/04/2000
Pages: 1
Title: EPA PUBLIC NOTICE: MARION PRESSURE TREATING SITE PLACED ON NATIONAL PRIORITIES LIST; TECHNICAL ASSISTANCE GRANT AVAILABLE FOR THE SITE (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: NOTICE

	Name	Organization
Author:	N/A	U.S. EPA
	Name	Organization
Addressee:	N/A	PUBLIC

Docid: 145478
Date: 02/09/2000
Pages: 1
Title: YOU ARE INVITED TO AN OPEN HOUSE FOR THE MARION PRESSURE TREATING COMPANY SUPERFUND SITE (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: NOTICE

	Name	Organization
Author:	N/A	U.S. EPA
	Name	Organization
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Related Document(s):

Docid: 900226
Bates: **To:**
Date: 06/08/2000
Pages: 1
Title: TRANSMITTAL LETTER FOR THE SUMMARY OF WATER QUALITY ANALYSES FROM THE CITY OF MARION DRINKING WATER WELLS #1 AND #2 FOR THE MARION PRESSURE TREATING COMPANY
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. EPA

	Name	Organization
Addressee:	BREWSTER , JUDY	MARION TOWN CLERK

Docid: 900227
Bates: **To:**
Date: 06/08/2000
Pages: 1
Title: TRANSMITTAL TO LDEQ OF SUMMARY OF WATER QUALITY ANALYSES FROM THE CITY OF MARION DRINKING WATER WELLS NUMBER 1 AND 2 - REPORT DATED 5/19/2000
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. EPA

	Name	Organization
Addressee:	BUSQUET , RAUL	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
	MATTE , RONNY	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Docid: 901078
Date: 06/01/2000
Pages: 2
Title: COMMUNITY RELATIONS REMINDER FOR MARION PRESSURE TREATING COMPANY
Doc Type: FACTSHEET

	Name	Organization
Author:	N/A	U.S. EPA

	Name	Organization
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 140285
Date: 07/21/2000
Pages: 183
Title: REMEDIAL INVESTIGATION AND FEASIBILITY STUDY SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT (SLERA) FOR MARION PRESSURE TREATING COMPANY (DESCRIPTION: PRELIMINARY INVESTIGATIONS IN SUPPORT OF THE NEED TO CONDUCT A BASELINE ECOLOGICAL RISK ASSESSMENT)

Doc Type: HEALTH ASSESSMENT

	Name	Organization
Author:	N/A	TETRA TECH EM INC.

	Name	Organization
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 140278
Bates: To:
Date: 07/21/2000
Pages: 12
Title: INCORPORATION OF REVIEW COMMENTS FROM VARIOUS AGENCIES FOR THE FINAL SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT(SLERA)

Doc Type: CORRESPONDENCE

	Name	Organization
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.

	Name	Organization
Addressee:	CANELLAS , BARTOLOME J	U.S. ENVIRONMENTAL PROTECTION AGENCY

Docid: 140302
Date: 08/01/2000
Pages: 2
Title: AUGUST 2000 FACT SHEET FOR MARION PRESSURE TREATING COMPANY (TESTING OF SOIL AND SEDIMENT TO DETERMINE CONTAMINATION THAT WOULD ENDANGER PUBLIC HEALTH AND THE ENVIRONMENT)(DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)

Doc Type: FACTSHEET

	Name	Organization
Author:	N/A	U.S. EPA

	Name	Organization
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145620
Date: 08/17/2000
Pages: 2
Title: TRANSMITTAL OF SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT(SLERA) REPORT TO MARION TOWN CLERK
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. ENVIRONMENTAL PROTECTION AGENCY
Addressee:	WALL , DAN	U.S. FISH AND WILDLIFE
	SANGER , DENISE	NATIONAL OCEANIC ATMOSPHERIC ADMINISTRATION
	BREWSTER , JUDY	MARION TOWN CLERK
	CONZELMANN , PAUL	U.S. FISH AND WILDLIFE
	LEE , ROGER	U.S. GEOLOGICAL SURVEY
	MATTE , RONNY	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Docid: 145479
Date: 09/01/2000
Pages: 4
Title: MARION PRESSURE TREATING COMPANY SITE FACT SHEET-SEPTEMBER 2000 (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: FACTSHEET

	Name	Organization
Author:	N/A	U.S. EPA
Addressee:	N/A	PUBLIC

Docid: 140725
Date: 09/28/2000
Pages: 2
Title: YOU ARE INVITED TO AN AVAILABILITY SESSION FOR THE MARION PRESSURE TREATING COMPANY SITE (DESCRIPTION: DOCUMENT IN SUPPORT OF EPA COMMUNITY INVOLVEMENT ACTIVITIES)
Doc Type: NOTICE

	Name	Organization
Author:	N/A	U.S. EPA
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145617
Date: 02/15/2001
Pages: 2
Title: NOTICE OF PUBLIC MEETING, PUBLIC HEALTH ASSESSMENT FOR THE MARION PRESSURE TREATING COMPANY SITE (DESCRIPTION: INVESTIGATION FROM OTHER STATE OR FEDERAL AGENCIES IN SUPPORT OF AN UNDETERMINED RISK PRESENTED BY THE CURRENT SITE)

Doc Type: NOTICE

	Name	Organization
Author:	N/A	U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES, AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY
	N/A	LOUISIANA DEPARTMENT OF HEALTH & HOSPITALS, OFFICE OF PUBLIC HEALTH
Addressee:	NONE ,	N/A

Docid: 145471
Date: 03/01/2001
Pages: 2
Title: TECHNICAL DIRECTION ON BIG CREEK AND GRID NONPARAMETRIC STATISTICS
Doc Type: E-MAIL MESSAGE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
Addressee:	RILEY , DAVID	U.S. EPA REGION 6
	RAUSCHER , JON	U.S. EPA REGION 6
	RODDY , SUSAN	U.S. EPA REGION 6

Docid: 145473
Date: 04/13/2001
Pages: 1
Title: TETRA TECH FORWARDING A COPY OF THE HUMAN HEALTH RISK ASSESSMENT(HHRA) FOR EPA'S REVIEW
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	BARINKA , LOU	TETRA TECH EM INC.
Addressee:	CARTER , LINDA	U.S. EPA

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145472
Date: 04/16/2001
Pages: 1
Title: CORRESPONDENCE TRANSMITTING A COPY OF THE DRAFT HUMAN HEALTH RISK ASSESSMENT(HHRA) REPORT TO LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. EPA
Addressee:	KIRK , DAVID	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Docid: 901139
Date: 05/11/2001
Pages: 1
Title: EMAIL MESSAGE REGARDING COMMNETS ON THE DRAFT HUMAN HEALTH RISK ASSESSMENT(HHRA) FOR THE MARION PRESSURE TREATING COMAPNY SITE
Doc Type: E-MAIL MESSAGE

	Name	Organization
Author:	KIRK , DAVID	LOUISIANA DEPARTMENT OF ENVIRONMENT QUALITY
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

Docid: 145614
Date: 05/14/2001
Pages: 1
Title: LETTER REGARDING RECEIPT OF THE HUMAN HEALTH RISK ASSESSMENT(HHRA) DATED APRIL 16, 2001, STATING THAT THERE AREN'T ANY COMMENTS ABOUT THE REPORT (DESCRIPTION: DOCUMENTS CONCURRENCE OF STATE)
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	KIRK , DAVID	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

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Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145474
Date: 05/25/2001
Pages: 1841
Title: MPTC HUMAN HEALTH RISK ASSESSMENT(HHRA) REPORT (DESCRIPTION: DOCUMENTS FINDINGS RELATED TO HUMAN HEALTH RISK ASSESSMENT, 4 VOLUMES)
Doc Type: HEALTH ASSESSMENT

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 145496
Bates: To:
Date: 05/25/2001
Pages: 2
Title: TETRA TECH'S TRANSMITTAL OF A FINAL COPY OF THE HUMAN HEALTH RISK ASSESSMENT(HHRA) AND INSERT PAGES AS REQUESTED ON MAY 11, 2001
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

Docid: 145462
Date: 06/05/2001
Pages: 2
Title: CHANGEOUT PAGES TO THE TEXT OF THE HUMAN HEALTH RISK ASSESSMENT(HHRA) REQUESTED BY BART CANELLAS ON JUNE 5, 2001, VOLUME 1 OF 4, CONTRACT NAME & NO. 68-00-W-083
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

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Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145612
Date: 06/18/2001
Pages: 3
Title: MEMORANDUM PRESENTING RECOMMENDED REMEDIATION VALUES BASED ON RISK ESTIMATES FROM THE HUMAN HEALTH RISK ASSESSMENT(HHRA) FOR MARION PRESSURE TREATING SITE (DESCRIPTION: DOCUMENTS FINDINGS RELATED TO HUMAN HEALTH RISK ASSESSMENT)

Doc Type: MEMORANDUM

	Name	Organization
Author:	RILEY , DAVID	U.S. EPA REGION 6

	Name	Organization
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

Docid: 901140
Date: 06/18/2001
Pages: 2
Title: [NO COMMENTS AT THIS TIME TO DRAFT FEASIBILITY STUDY TECHNICAL MEMO AND SCREENING OF ALTERNATIVES]

Doc Type: E-MAIL MESSAGE

	Name	Organization
Author:	KIRK , DAVID	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

	Name	Organization
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 903449
Date: 06/27/2001
Pages: 29
Title: RESPONSE ACTION CONTRACT FOR REMEDIAL, ENFORCEMENT OVERSIGHT, AND NONTIME-CRITICAL REMOVAL ACTIVITIES IN REGION 6
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	CANELLAS , BARTOLOME J	ENVIRONMENTAL PROTECTION AGENCY
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	EPA

Related Document(s):

Docid: 145461
Bates: To:
Date: 06/27/2001
Pages: 1
Title: COVER LETTER REGARDING MPTC FEASIBILITY STUDY [FS] REMEDIAL ALTERNATIVES MEMORANDUM [ONE VOLUME]
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INCORPORATED
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	ENVIRONMENTAL PROTECTION AGENCY

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145460
Date: 07/03/2001
Pages: 110
Title: MPTC FEASIBILITY STUDY (FS) TECHNICAL MEMORANDUM (DESCRIPTION : AS PART OF THE FEASIBILITY PROCESS, DOCUMENTS THE AVAILABLE PRESUMPTIVE REMEDY TECHNOLOGIES)
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	TETRA TECH EM INCORPORATED
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

Related Document(s):

Docid: 145611
Bates: **To:**
Date: 07/10/2001
Pages: 1
Title: TRANSMITTAL LETTER REGARDING THE FEASIBILITY STUDY TECHNICAL MEMORANDUM REPORT DATED JULY 3, 2001
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
	<u>Name</u>	<u>Organization</u>
Addressee:	BREWSTER , JUDY	MARION TOWN CLERK

Docid: 146639
Bates: **To:**
Date: 07/03/2001
Pages: 1
Title: [TRANSMITTAL OF MARION PRESSURE TREATING COMPANY SUPERFUND SITE FEASIBILITY STUDY TECHNICAL MEMORANDUM]
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALTMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BART	U.S. ENVIRONMENTAL PROTECTION AGENCY

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145498
Date: 07/16/2001
Pages: 962
Title: MPTC REMEDIAL INVESTIGATION (RI) REPORT - VOLUME 1 OF 3 (DESCRIPTION : DOCUMENTS FINDINGS OF THE REMEDIAL INVESTIGATION), CONTRACT NAME & NO. 68-W6-0037
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 145497
Bates: **To:**
Date: 07/16/2001
Pages: 1
Title: TRANSMITTAL LETTER FOR THE MPTC FINAL REMEDIAL INVESTIGATION (RI) REPORT (DESCRIPTION: DOCUMENTS FINDINGS OF THE REMEDIAL INVESTIGATION)
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

Docid: 145476
Date: 07/18/2001
Pages: 1
Title: RECEIPT OF THE FEASIBILITY STUDY (FS) TECHNICAL MEMORANDUM (DESCRIPTION: DOCUMENTS CONCURRENCE OF STATE)
Doc Type: E-MAIL MESSAGE

	<u>Name</u>	<u>Organization</u>
Author:	KIRK , DAVID	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145604
Date: 07/27/2001
Pages: 2453
Title: MPTC ECOLOGICAL RISK ASSESSMENT (ERA) - (4 OF 4 VOLUMES, CONTRACT NAME & NO. 68-W6-0037)
Doc Type: REPORT / STUDY

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 145603
Bates: To:
Date: 07/30/2001
Pages: 1
Title: TRANSMITTAL OF THE MPTC FINAL ECOLOGICAL RISK ASSESSMENT(ERA) REPORT, VOLUME 1 OF 4, CONTRACT NAME & NO. 68-W6-0037
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA

Docid: 145615
Date: 08/02/2001
Pages: 3
Title: MPTC MAPS - FIGURE 1 - PROPOSED AND AS-BUILT FENCE, FIGURE 3 - CURRENT PROPERTY OWNERSHIP MAP, FIGURE 4 - SITE TOPOGRAPHY MAP
Doc Type: MAP

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
Addressee:	N/A	U.S. EPA

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145616
Date: 07/31/2001
Pages: 1
Title: TRANSMITTAL OF THE DRAFT PROPOSED PLAN (PP) FOR MPTC SITE - (ENCLOSURE NOT ENCLOSED)
Doc Type: CORRESPONDENCE

	Name	Organization
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
Addressee:	DAVID , KIRK	LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Docid: 145669
Date: 08/06/2001
Pages: 1
Title: FACT SHEET FOR THE MARION PRESSURE TREATING COMPANY SUPERFUND SITE, MARION, UNION PARISH, LOUISIANA
Doc Type: FACTSHEET

	Name	Organization
Author:	N/A	U.S. EPA
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145662
Date: 08/15/2001
Pages: 26
Title: REMEDIAL INVESTIGATION/ FEASIBILITY STUDY FOR MARION PRESSURE TREATING COMPANY SITE
Doc Type: COMMUNITY RELATIONS PLAN

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 145678
Bates: To:
Date: 08/15/2001
Pages: 1
Title: MARION PRESSURE TREATING COMPANY COMMUNITY RELATIONS WORK PLAN [TRANSMITTAL LETTER]
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALTMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

Docid: 145670
Date: 08/16/2001
Pages: 3
Title: AUGUST 2001 FACT SHEET FOR MARION PRESSURE TREATING COMPANY SUPERFUND SITE
Doc Type: FACTSHEET

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145672
Date: 08/17/2001
Pages: 2
Title: PROPOSED PLAN CONCURRENCE SIGN ON SHEET
Doc Type: LIST

	<u>Name</u>	<u>Organization</u>
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
	QUINONES , EDWARD	U.S. EPA REGION 6
	BUZZELL , JUNE	U.S. EPA REGION 6
	PEYCKE , MARK A	U.S. EPA REGION 6
	KNUDSON , MYRON O	U.S. ENVIRONMENTAL PROTECTION AGENCY
	CHIA , SING	U.S. EPA REGION 6
	STENGER , WREN	U.S. EPA REGION 6
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	PUBLIC

Docid: 145671
Date: 08/22/2001
Pages: 1
Title: [SUBJECT] LETTER TO MR CANELLAS REGARDING PROPOSED REMEDIAL PLAN FROM LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	BRENT , JAMES H	LOUISIANA DEPARTMENT OF ENVIROMENTAL QUALITY
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

Docid: 145664
Date: 08/23/2001
Pages: 1
Title: PUBLIC INVITATION TO AN OPEN HOUSE FOR THE MARION PRESSURE TREATING COMPANY SUPERFUND SITE
Doc Type: NOTICE

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	PUBLIC

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REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145663
Date: 08/24/2001
Pages: 32
Title: SUMMARY OF COMMUNITY INTERVIEWS CONDUCTED ON AUGUST 14, 2001
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

Related Document(s):

Docid: 145674
Bates: To:
Date: 08/27/2001
Pages: 1
Title: FAX TRANSMITTAL SHEET RE: COMMUNITY INTERVIEWS PREPARED BY TETRA TECH
Doc Type: FAX TRANSMITTAL / COVER SHEET

	<u>Name</u>	<u>Organization</u>
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
Addressee:	DAVID , KIRK	LOUISIANA DEPARTMENT OF ENVIROMENTAL QUALITY

Docid: 145665
Date: 08/27/2001
Pages: 6
Title: FACTSHEET REGARDING INVITATION TO COMMENT ON THE PROPOSED CLEANUP OF THE MARION PRESSURE TREATING COMPANY SUPERFUND SITE, MARION, LOUISIANA
Doc Type: FACTSHEET

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
Addressee:	N/A	PUBLIC

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145675
Date: 08/27/2001
Pages: 1
Title: TRANSMITTAL LETTER RE: COMMUNITY INTERVIEWS [ATTACHMENT NOT ATTACHED]
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6
Addressee:	JENKINS , JAN	N/A

Docid: 145666
Date: 08/28/2001
Pages: 5
Title: EPA INTERNET WEBSITE SITE SUMMARY FACT SHEET IN REGARDS TO MARION PRESSURE TREATING COMPANY
Doc Type: ELECTRONIC RECORD

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
Addressee:	N/A	PUBLIC

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 146637
Date: 08/28/2001
Pages: 1
Title: EPA T0 HOST AVAILABILITY SESSION FOR MARION PRESSURE TREATING COMPANY SUPERFUND SITE
Doc Type: NOTICE

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
	<u>Name</u>	<u>Organization</u>
Addressee:	NONE ,	PUBLIC

Related Document(s):

Docid: 145667
Bates: To:
Date: 08/28/2001
Pages: 1
Title: [TRANSMITTAL FOR NOTICE FOR A NEWSPAPER AD FOR THE PROPOSED CLEANUP OF THE MARION PRESSURE TREATING COMPANY SUPERFUND SITE]

Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 146638
Date: 08/28/2001
Pages: 1
Title: DONT FORGET! U.S. EPA MEETINGS FOR MARION PRESSURE TREATING COMPANY SITE REMINDER
SEPTEMBER 2001 MEETINGS

Doc Type: NOTICE

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	U.S. ENVIRONMENTAL PROTECTION AGENCY
	<u>Name</u>	<u>Organization</u>
Addressee:	NONE ,	PUBLIC

Related Document(s):

Docid: 145668
Bates: **To:**
Date: 08/28/2001
Pages: 1
Title: [TRANSMITTAL FOR REMINDER CARD FOR AN UPCOMING OPEN HOUSE AND PUBLIC MEETING FOR THE
MARION PRESSURE TREATING COMPANY]

Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OUID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 145677
Date: 08/29/2001
Pages: 38
Title: COMMUNITY INVOLVEMENT PLAN FOR MARION PRESSURE TREATING COMPANY SUPERFUND SITE, MARION, UNION PARISH, LOUISIANA
Doc Type: COMMUNITY RELATIONS PLAN

	<u>Name</u>	<u>Organization</u>
Author:	N/A	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	U.S. EPA

Related Document(s):

Docid: 145676
Bates: To:
Date: 08/29/2001
Pages: 1
Title: CORRESPONDENCE REGARDING THE REVISED COMMUNITY INVOLVEMENT PLAN
Doc Type: COMMUNITY RELATIONS PLAN
CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	ALLMAN , GEORGE	TETRA TECH EM INC.
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME J	U.S. EPA REGION 6

Docid: 145673
Date: 09/05/2001
Pages: 15
Title: PROPOSED PLAN FOR THE MARION PRESSURE TREATING COMPANY SITE, MARION, UNION PARISH, LOUISIANA
Doc Type: WORK PLAN / AMENDMENT

	<u>Name</u>	<u>Organization</u>
Author:	N/A	U.S. EPA
	<u>Name</u>	<u>Organization</u>
Addressee:	N/A	PUBLIC

ADMINISTRATIVE RECORD INDEX

FINAL 5/2/2002

REMEDIAL

Site Name MARION PRESSURE TREATING COMPANY (LAD008473142)
CERCLIS LAD008473142
OID N/A
SSID MARION PRESSURE TREATING SITE (7Z)
Action

Docid: 908743
Date: 09/28/2001
Pages: 1
Title: [CORRESPONDENCE REGARDING DETERMINATION THAT PROPOSED PLAN[S2] IS THE BEST COURSE OF ACTION FOR THE CLEAN UP OF THE MARION PRESSURE TREATING INDUSTRIAL SITE]
Doc Type: CORRESPONDENCE

	<u>Name</u>	<u>Organization</u>
Author:	FRANKLIN , KENNETH W	TOWN OF MARION
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME	U.S. ENVIRONMENTAL PROTECTION AGENCY

Related Document(s):

Docid: 908744
Bates: **To:**
Date: 10/01/2001
Pages: 1
Title: [ENVELOPE ENCLOSING CORRESPONDENCE REGARDING DETERMINATION THAT PROPOSED PLAN[S2] IS THE BEST COURSE OF ACTION FOR THE CLEAN UP OF THE MARION PRESSURE TREATING INDUSTRIAL SITE]
Doc Type: ENVELOPE

	<u>Name</u>	<u>Organization</u>
Author:	NONE ,	TOWN OF MARION
	<u>Name</u>	<u>Organization</u>
Addressee:	CANELLAS , BARTOLOME	U.S. ENVIRONMENTAL PROTECTION AGENCY

Docid: 908850
Date: 10/08/2001
Pages: 18
Title: [PUBLIC MEETING HELD ON THE PROPOSED PLAN FOR CLEANUP]
Doc Type: PUBLIC COMMENT

	<u>Name</u>	<u>Organization</u>
Author:	MCLLEN , LORRIE	DURHAM COURT REPORTING, INC

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Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents

This *Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (also commonly referred to as the "ROD Guidance") has been developed to accomplish the following.

- Provide recommended formats and content for Superfund remedial action decision documents;
- Clarify roles and responsibilities of the U.S. Environmental Protection Agency (EPA), Federal facilities, States, and Indian Tribes in developing and issuing decision documents;
- Clarify roles and responsibilities of stakeholders in the remedy selection process; and
- Explain how to address changes made to proposed and selected remedies.

The decision documents addressed by this guidance are the Proposed Plan, the Record of Decision (ROD), the Explanation of Significant Differences (ESD), and the ROD Amendment. Section 117 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), requires the issuance of decision documents for remedial actions taken pursuant to Sections 104, 106, 120, and 122. Sections 300.430(f)(2), 300.430(f)(4) and 300.435(c)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establish the regulatory requirements for these decision documents. This guidance document provides additional guidelines and is based upon the Superfund statute and regulations.

The documents below are in PDF format. For information on PDFs, please click on the "About PDF" icon.



For descriptions of the Guide's chapters and appendices, please see the [table](#) below.

Table of Contents:

[ROD Guidance Transmittal Memorandum](#) [100K, 2 pages] includes:

- Transmittal Memorandum from Steve Luftig

[ROD Guidance Section A](#) [358K, 26 pages] includes:

- Introductory material such as Cover Page, Abstract, and Table of Contents.
- Chapter 1: Introduction
- Chapter 2: Process for Developing the Proposed Plan

[ROD Guidance Section B](#) [370K, 21 pages] includes:

- Chapter 3: Writing the Proposed Plan
- Chapter 4: Pre-Record of Decision Changes

[ROD Guidance Section C](#) [432K, 6 pages] includes:

- Chapter 5: Process for Developing the Record of Decision

[ROD Guidance Section D](#) [418K, 35 pages] includes:

- Chapter 6 (Part 1 of 2): Writing the Record of Decision

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Tools

[Enviromapper](#) - map hazardous waste sites in your community.

Use the [Basic](#) or [Advanced Query](#) to locate hazardous waste sites near you.

Review [Record of Decision Abstracts](#) (RODs).

Use a [Map of NPL Sites](#) in the United States

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[ROD Guidance Section E](#) [419K, 29 pages] includes:

- o Chapter 6 (Part 2 of 2): Writing the Record of Decision

[ROD Guidance Section F](#) [459K, 29 pages] includes:

- o Chapter 7: Documenting Post-ROD Changes: Minor Changes, Explanations of Significant Differences, and ROD Amendments
- o Chapter 8: Documenting No Action, Interim Action, and Contingency Remedy Decisions
- o Chapter 9: Documenting Specific Remedy Selection Situations

[ROD Guidance Section G](#) [207K, 20 pages] includes:

- o Appendix A: Sample Proposed Plan
- o Appendix B: Documenting Special Ground-Water Remedy Decisions

[ROD Guidance Section H](#) [275K, 16 pages] includes:

- o Appendix C: Consultation Procedures for Superfund Response Decisions
- o Appendix D: Records of Decision and Other Decision Documents to EPA Headquarters
- o Appendix E: Sources of Information

Chapter/Appendix	Description
Chapter 1	Chapter 1 presents the purpose of the guidance and an overview of the remedial response process. Table of Contents
Chapter 2	Chapter 2 summarizes the roles and responsibilities of lead and support agencies in developing the Proposed Plan, highlights the requirements for the newspaper notification that announces the availability of the Proposed Plan, and discusses the public comment process. Table of Contents
Chapter 3	Chapter 3 presents the purpose and regulatory requirements of the Proposed Plan and contains a detailed checklist outlining the components of a Proposed Plan. This checklist may be used as a worksheet when writing or reviewing a Proposed Plan. Table of Contents
Chapter 4	Chapter 4 describes the general framework for categorizing minor and significant changes made to the Preferred Alternative before issuance of the ROD, and discusses documentation and public information activities that may be necessary as a result of these changes. Table of Contents
Chapter 5	Chapter 5 summarizes the roles and responsibilities of lead and support agencies in developing the ROD and outlines how to issue the notice of ROD availability. Table of Contents
Chapter 6	Chapter 6 presents the purpose and regulatory requirements for the ROD, as well as a recommended format that discusses key elements and summary tables for each section. This chapter also contains a detailed checklist outlining the components of a ROD. This checklist may be used as a worksheet when writing or reviewing a ROD. Table of Contents
Chapter 7	Chapter 7 discusses the procedures to follow when changes occur to the Selected Remedy after a ROD is signed. A sample outline and checklist is presented for Explanations of Significant Differences (ESDs) and ROD Amendments. Table of Contents
Chapter 8	Chapter 8 presents the recommended ROD formats for three specific types of remedial action decisions: no action, interim action, and

	contingency remedy decisions. Table of Contents
Chapter 9	Chapter 9 presents information on documenting the following remedy selection situations: lead (Pb), presumptive remedies, and ground water. Table of Contents
Appendix A	Appendix A provides an example Proposed Plan that satisfies the requirements and suggestions described in this guidance. Table of Contents
Appendix B	Appendix B provides additional information on addressing the following groundwater issues: phased approach, non-aqueous phase liquids (NAPLs), deferral of design, and monitored natural attenuation. Table of Contents
Appendix C	Appendix C contains a fact sheet and a transmittal memorandum that discuss consultation procedures for Superfund response decisions. Table of Contents
Appendix D	Appendix D outlines the procedures for submitting final remedy selection decision documents to the Superfund Document Center at EPA Headquarters. Table of Contents
Appendix E	Appendix E lists additional sources of information on the remedy selection process and other stages of the remedial process that might be helpful to a remedy selection decision document writer. Table of Contents

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APPENDIX B

COURT REPORTER TRANSCRIPTS OF PUBLIC MEETINGS

ORIGINAL

ENVIRONMENTAL PROTECTION AGENCY

On September 27, 2001, at 7:30 p.m., a public meeting was held on the proposed plan for cleaning up the Marion Pressure Treating Company, held at the Marion High School Cafeteria, 3062 Taylor Street, Marion, Louisiana.

REPORTED BY:

Lorrie McLen
Certified Court Reporter
No. 91185
State of Louisiana

* * * * *

APPEARANCES:

Mr. Bartolome J. Canellas
Speaker

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SPEAKER:

I would like to say good evening again and thank all of you for being here today. My name is Bartolome Canellas. I am Remedial Project Manager for EPA in the Superfund program in Region 6, Dallas, Texas, and I am the Remedial Project Manager for the investigation of the Marion Pressure Treating Company Site in Marion, Union Parish, Louisiana.

The site is a former abandoned wood treatment facility that was brought to the attention of the EPA from the state that requested EPA to investigate any potential environmental or human health problems related to the site.

Through the Superfund process, the site was evaluated and a preliminary assessment was done. A site inspection was done. There was a need for some immediate emergency action and a removal was done in 1996-1997.

Through the assessment process, the site was further evaluated and considered that it could meet the criteria to be listed on the Superfund program in the list of sites that are eligible for further action or response under Superfund.

Once the site was identified as a potential site for further action, EPA did a remedial investigation and feasibility study which included a human health risk assessment and an ecological and environmental risk

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assessment.

I am here tonight to bring some of the findings of this investigation we have done to inform what are the problems that we have identified and to discuss possible solutions or actions that can be implemented to solve any problem.

During the investigations we did there, we did a ground water investigation. We collected samples of the ground water. We started monitoring wells. We did an investigation that also included taking samples of water, soil, sediment. We also did - as part of the environmental and ecological investigation, we collected samples of vegetation, small fish, small invertebrates such as crawfish, small mammals, and all this information was looked into the remedial investigation risk assessment, ecological assessments done for the site. We have found currently that there seems to be a small problem in an area southeast of the site near Big Creek, where today we can see some creosote that's still on the ground. We have pictures that show some of these areas and we can see some of the creosote stain there in the ground. We have also found that there is an area problem of risk in a mounded area on the center of the site known as the consolidation area. During the immediate action, removal action, the most contaminated soils of the site were grouped from all

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1 areas into this mound on the center of the site. Today we
2 have a concern that the contaminates on this mound could
3 leak contaminates into the ground water and will not meet
4 the requirements of the state for the protection of the
5 ground water know as RECAP.

6 During the risk assessment, we have found that there
7 are no risks to the residents off-site from the site. We
8 have also looked to the risk on site and we have identified
9 that there can be some risks if the site is used in the
10 future for an industrial or recreational use and if wells
11 are installed on site and people drink some of this
12 contaminated ground water.

13 During the remedial investigation, to address some
14 of the unknowns, area where the soil can have creosote and
15 could present a risk, at the end of the action, we built a
16 fence around the site trying to cover all the areas where
17 our samplings show there can be some contaminates or visual
18 observations show that there can be some contaminates,
19 therefore, the fence, at this moment, prevents risk to
20 people that may wonder into the site and are not aware of
21 any potential problem there. We know from the original
22 site investigations, some areas of the site has been used
23 for hunting and there were even some deer blinds on several
24 spots of the site. This is what I am showing in a
25 photograph. It's precisely on top of the consolidation

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1 area or the mounded area where most of the heavy
2 contamination have been placed and buried, under this
3 mound.

4 To address the different - the risk areas, we have
5 identified the ground water as a concern, the consolidation
6 area, or the mounded area, as a concern. We have
7 identified a small area of Big Creek to be a concern of a
8 problem.

9 A different view of these areas of concern can be
10 looked at in terms of the human health risk assessment. In
11 general, the entire side may present some acceptable risk
12 level to public health, but if we look to different
13 individual areas, we may find that some areas will indicate
14 a potential problem, specifically the area of the
15 consolidation area and an area that we know as subarea
16 number 8 where further action may be required. EPA
17 developed a proposed plan --

18 **MS. RUBY EASTER:**

19 Excuse me, on number 8, what avenues has been
20 taken there, since you found evidence, what avenues have
21 you taken?

22 **SPEAKER:**

23 We found that samples taken on this spot in
24 area number 8 have creosote-related chemical compound
25 contaminates in a quantity large enough to present a

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1 possible risk to people that may wonder into this area.

2 **MS. RUBY EASTER:**

3 Okay. That little creek, does that run
4 across - it does run across that road, doesn't it?

5 **SPEAKER:**

6 No, this area is called Big Creek. The
7 others is far away from the area of the road. The road is
8 here. I'm talking about this area here, far, far away from
9 the road. This is the area where the samples showed that
10 we have the greatest amount of contaminate and that they
11 are in an amount large enough that will affect people or
12 will affect the environment. EPA have --

13 **MS. RUBY EASTER:**

14 So the deer can't drink from there, right,
15 where you have it fenced around?

16 **SPEAKER:**

17 We have fence around and the deer cannot get
18 access to this area. We have collected water samples and
19 water samples showed that it will be acceptable for the
20 risk of the animals. The only animals or part of the
21 environment that will be affected are the small animals in
22 this area such as a small fish, a small crawfish, small
23 insects, invertebrates that don't tend to move into wide
24 areas. If it's a large animal like a bird, a rat, a deer,
25 they wonder into a bigger area to gather their food and

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1 when we look into the entire area, the amount of food that
2 they get will not be enough or is not contaminated enough
3 to create an unacceptable risk to them, but just the small
4 animals that may only live in this area.

5 To address this area and the area of the mounded
6 consolidation area, EPA have looked to different treatment
7 technologies that can be used to remove this contaminate.
8 We have looked to what things have worked in the past. We
9 know that they work, we know we can implement them easily,
10 we know that they are effective. We know we have used
11 these things in different sites in the past, and we call
12 this proven technology like perceptive remedies, are things
13 we know worked in the past. Based on perceptive remedies,
14 have looked at what works in the past and it includes bio-
15 remediation using a small bacteria that can degrade and
16 reduce the contaminate. We have looked into thermal
17 desorption that is a treatment process that will remove and
18 destroy the contaminate. We have looked into incineration,
19 which is also another alternative. We have looked into
20 doing these things in the area of the site, to do these
21 things outside from the site, what may be the cost of these
22 different alternatives, and they have been presented on
23 what we know as a proposed plan, and this proposed plan
24 shows the different alternatives, the costs that are
25 involved for the different alternatives. It was brought to

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1 the attention of the public on September 4th, and on
2 September 5th we started a public comment period where any
3 person can provide any comment in reference to any of the
4 proposed alternative inductment.

5 And tonight we have a court recorder. If any person
6 here wants to make a comment, she will write down the
7 comment, and EPA have made the commitment that we will
8 consider and we will respond to any comment that is made
9 here today. That's the purpose of this lady here. Also,
10 you are still within the thirty-day public comment period.
11 If you want to tell us something and you would rather write
12 to us, you can write here on this form or any letter, send
13 it to our attention. Any comment received within the
14 thirty days will be considered, will be responded before
15 EPA make a final decision in relation to this alternative.

16 We have done an investigation to try to find out
17 what is the problem, try to identify possible solutions and
18 we have tried to request input from the community to be
19 sure that we are addressing any concern or any
20 ...(inaudible)... that you have at this time. We did some
21 community interviews and we met different people from the
22 community. They gave us information about what things are
23 in their mind, what do they perceive that they are - that
24 is the problem, so that our proposed plan could try to
25 include these concerns from the community. When we

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1 released the proposed plan, we invited different people
2 from the community. We have a mailing list at EPA of
3 people that have told us in the past that they were
4 interested about what's happening here, so we sent through
5 the mail a document called a Fact Sheet, explaining where
6 we are now today. We sent through the mail some invitation
7 cards to tell the people we are going to have this meeting
8 here. You are welcome to come and tell us if there is
9 something here that is a concern. We have also sent some
10 reminder cards so people will not forget. We have placed
11 some ads in newspapers in Monroe and Farmerville to alert
12 the public and the community about this meeting, where we
13 are today, what things we are thinking of possible
14 solutions and listen if they have any comment in relation
15 to any one of the solutions.

16 Tonight we have some representatives from the
17 Louisiana Department of Health and Hospital. We have
18 representatives from the Louisiana Department of
19 Environmental Quality. We have the mayor for the Town of
20 Marion. And I understand you represent a member of the
21 community?

22 **MS. RUBY EASTER:**

23 Yes.

24 **SPEAKER:**

25 Once again, we are here to try to inform you

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1 where we are today, where we think we can go tomorrow. We
2 looked into the different alternatives. EPA, from several
3 alternatives, mentioned that maybe alternative number 2
4 called thermal desorption may be one of the best solutions
5 to solve the problem. We have talked with the State of
6 Louisiana, the Department of Environmental Quality. We
7 have received information from them that they also tend to
8 agree that this may be one of the most sensible solutions
9 to address this problem. It's a solution similar to what
10 has been implemented at other sites in Louisiana. It's
11 something we have done in the past. We know how to do this
12 in such a way that it would work and it will be effective
13 and it will protect the community and environment.

14 Through all these investigations, we have done
15 different reports, the risk assessment, the sampling
16 report, this alternative - a lot of this information is
17 also available to the public. It's a lot of information,
18 it's a lot of paper. It's over seven thousand pages of
19 information and studies made. We have put this information
20 in some computer reports that we will distribute to anyone
21 that is interested, and many people today have computers,
22 other people may access a computer easily at our public
23 library. If anyone wants to look through the real details
24 of all the investigation, it's here and I will be more than
25 happy to provide a copy of this, and you may have a

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1 computer or know someone in the family have a computer or a
2 public library. Would you like to get a copy of this?

3 **MS. RUBY EASTER:**

4 Yeah, I have a computer.

5 **SPEAKER:**

6 There are some instructions here on how this
7 can be used in a computer, and it's easier than giving you
8 seven thousand pages and seven books of papers. All the
9 studies are there for the public to look at them.

10 **MS. RUBY EASTER:**

11 Thank you.

12 **SPEAKER:**

13 We have a few people from the town here
14 today. Again, this is an opportunity, if anyone from the
15 town wants to make any comment, it will be recorded. If
16 not, you still have an opportunity to send to us any
17 comment by mail and it will be considered before a final
18 decision is made. Would you like to make any comment
19 tonight or would you like to study this information or
20 maybe send something through the mail in the future?

21 **MS. RUBY EASTER:**

22 Well, the concerns that I have - I have
23 relatives that live in the area, just in the area here,
24 and, although, they weren't able to come tonight, I just
25 came to find out - they said the last time - I was not

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1 here, but they said the last time that the stuff was - when
2 you decided to remove the waste, it was done at night.

3 **SPEAKER:**

4 It was done --

5 **MS. RUBY EASTER:**

6 At night.

7 **SPEAKER:**

8 At night?

9 **MS. RUBY EASTER:**

10 Uh-huh. And they was asking - they wanted to
11 know that when you start it this time, will it be done by
12 truck or how is it going to be done? Do you use a vacuum
13 type of - well, I did some research and I found out that we
14 did have two Superfund deals in the State of Louisiana, and
15 I guess you would give the information here as to how you
16 did all that stuff, right?

17 **SPEAKER:**

18 Yes.

19 **MS. RUBY EASTER:**

20 Oh, okay. So I guess that would give me good
21 information.

22 **SPEAKER:**

23 We sent the proposed solution that we had.
24 We are looking to build some type of machine called a
25 thermal desorber. We are looking to take soil from the

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1 area of the consolidation area, or that mounded area in the
2 center of the site, take soil from the area of the Big
3 Creek and the southeast of the site. This soil that has
4 chemical related to creosote, they will be run through this
5 machine, this unit - treatment unit called the thermal
6 desorption. It will heat that soil. The contaminates that
7 get into the air once it's heated, they move into another
8 chamber where they get destroyed, and at the end of the
9 treatment unit you get soil that no longer have levels of
10 creosote and chemical of concentration that can be
11 hazardous to the risk of people and the environment. We
12 are also looking at - if we find some debris like
13 construction debris, if it is treated wood, trash on site,
14 there a lot of trash and debris on the site, things that
15 are not hazardous, they are likely to be taken out to a
16 permit facility by the state, some type of a landfill
17 facility that will retain this type of waste. If we find
18 some in the consolidation area, some waste that have
19 creosote and chemicals related to creosote that cannot be
20 run through this treatment machine, they will be taken to a
21 facility that have been permitted to take hazardous waste
22 and dispose or treatment of that waste, but the majority of
23 the waste is soil, dirt that will be run through this
24 treatment unit. We are also looking into ground water.
25 Through the full investigations we found that there was

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1 some liquid creosote in the ground. We are planning to do
2 further investigations in the future to identify that area.
3 If that area is small and falls within the area that's
4 going to be excavated, this thing is going to be taken out,
5 run through the treatment system and that contaminate is
6 going to be removed. If the area goes outside the area of
7 excavation, we may need to put some type of a recovery
8 trench, recovery well, some type of pipe or system where we
9 get this liquid oily creosote into some central point or
10 tank where we can get it out and send it to an approved
11 facility that is permitted and can handle disposal and
12 destruction of that type of waste.

13 **MS. RUBY EASTER:**

14 Okay. In the meantime, during the excavation
15 of - when you - in that area, you're taking that out, but
16 also you're saying that you found some that was in the
17 water. Okay. Now, you're taking out the soil, so the
18 water is still there, so what's happening with the water?

19 **SPEAKER:**

20 We have tested water around the perimeter of
21 the site and there are no contaminates.

22 **MS. RUBY EASTER:**

23 Say that again.

24 **SPEAKER:**

25 We have tested water around the site. We put

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1 some wells or pipes around the site and we found that the
2 water around the site was not contaminated and is not
3 presenting a problem. We have a small area here of three
4 wells where we have found that oily creosote, that when
5 it - to get it out - or if we don't do anything, in ten,
6 twenty or thirty years, it may move and affect other areas.
7 Now, we know it doesn't go outside this area, but we know
8 that this is a small area and we are planning further
9 investigations in the future to see if the area is just
10 about this size or if it's bigger. I know it's right here,
11 this area, small area, it's not the whole thing, but I
12 don't know if it extends from this area or how far it
13 extends, and we will come back and do further
14 investigations to find exactly where it is, how far it
15 extends, and either we will take it out with some type of
16 pipe or well or we will excavate the soil and take it out,
17 so there is going to be no way that it will go to the
18 ground water in the future. Did that answer your
19 question?

20 **MS. RUBY EASTER:**

21 Pretty much. So you're saying that this is
22 all like a rush, I mean, what you're trying to do is take
23 that out so it won't move any farther?

24 **SPEAKER:**

25 Exactly, because if I don't do anything now,

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1 it may just continue to spread through the years, and it's
2 better to take it now when it is in a small area than
3 waiting until we have a bigger problem fifty or a hundred
4 years down the road.

5 **MS. RUBY EASTER:**

6 Am I understanding you correctly, you're
7 going to take that out, you're going to filter the soil
8 somewhat, and you're going to put it back?

9 **SPEAKER:**

10 The soil that has been treated and is now
11 clean, it will be backfill, it will be put back in the area
12 where it came and it will be level and it will be seeded so
13 it will look nice and green, healthy, good to the
14 environment, good to the people, if someone wants to walk
15 there or visit the area, that they will not be at risk of
16 walking into an area where the soil has chemicals that they
17 are not aware or the soil have oily stuff that may get on
18 their hands, their bodies, their clothes, you know, we
19 don't want people in the future to walk into areas like
20 this where you have all this black stuff there in the
21 ground. Would anyone like to make any additional comment
22 or question or observation at this time? Once again, I
23 appreciate all of you for taking time to be here. Some of
24 you have come from Dallas, some of you have come from New
25 Orleans, from Baton Rouge, so I greatly appreciate all of

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1 you to be here tonight, and I understand the town is going
2 to send us some comments in the future through the mail and
3 we are also looking for anyone in the community that wants
4 to make any comment. Feel free to write to us and let us
5 know - you may comment on any of the alternatives that have
6 been presented. Thanks again and good night.

7 (MEETING CONCLUDED)

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C E R T I F I C A T E

I, **LORRIE MCLEN**, CERTIFIED COURT REPORTER AND NOTARY PUBLIC, DO HEREBY CERTIFY THAT THE ABOVE AND FOREGOING 17 PAGES OF TYPEWRITTEN MATTER CONSTITUTE A TRUE AND CORRECT COPY OF THE PROCEEDINGS HAD AT THE TIME AND PLACE AS SET FORTH IN PAGE ONE HEREOF.

IN WITNESS WHEREOF, I HEREUNTO AFFIX MY SIGNATURE AT MONROE, LOUISIANA, THIS THE 8TH DAY OF OCTOBER, 2001.

REPORTED BY:

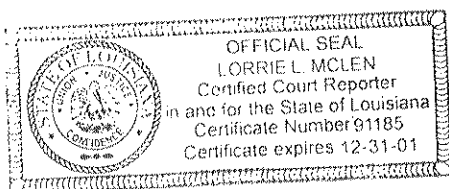
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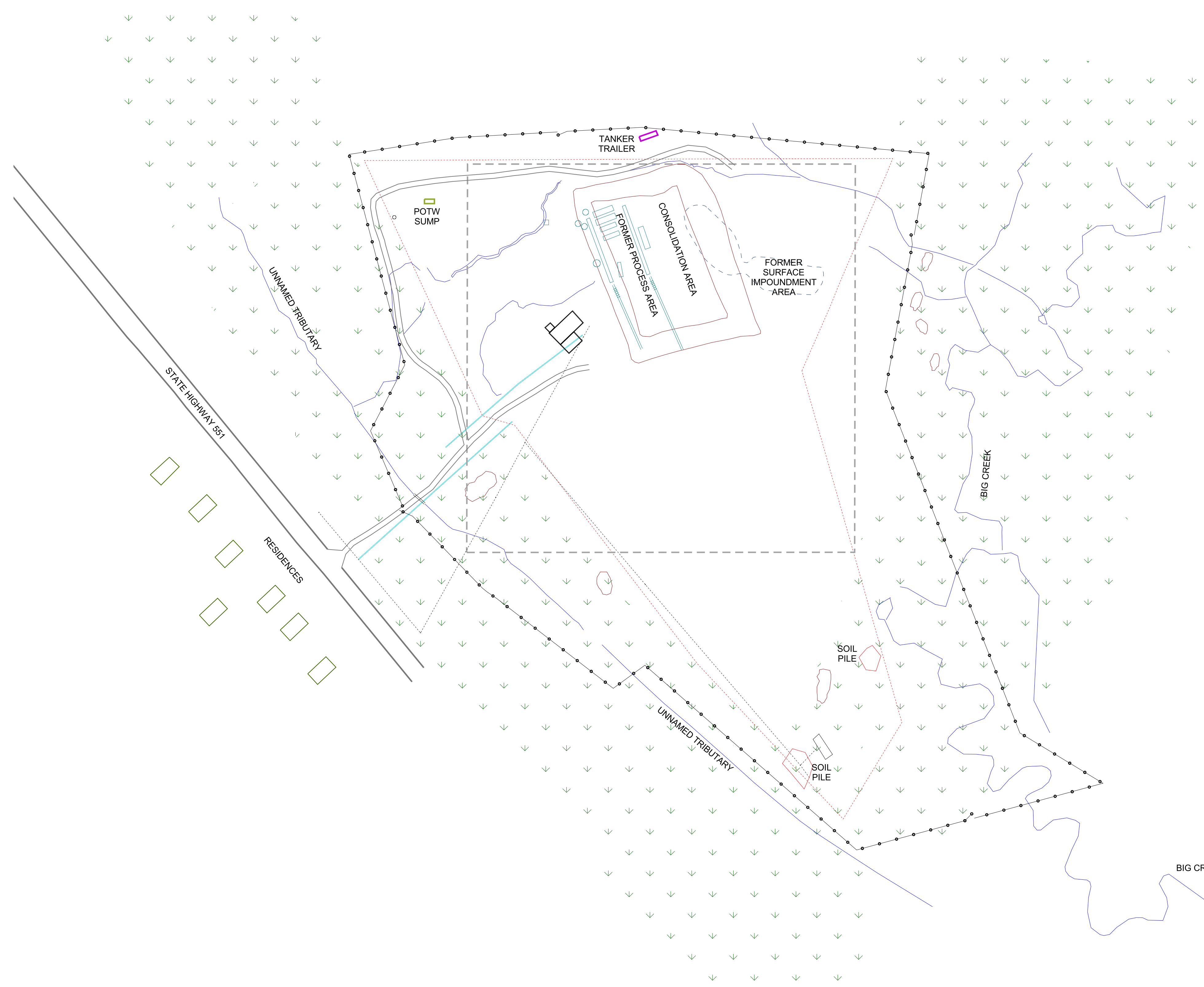
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- LEGEND**
- Site Features
- NEW FENCE
 - STRUCTURES
 - SUMP
 - TANKER TRAILER
 - SHED
 - SOIL PILE
 - FORMER PROCESS AREA
 - FORMER SURFACE IMPOUNDMENT
 - CONSOLIDATION AREA
 - OPERATIONAL BOUNDARY
 - 10 ACRE TRACT
 - HIGHWAY
 - DIRT ROAD
 - CULVERT
 - STREAM
 - WETLANDS
 - OVERHEAD ELECTRICAL
 - EXPOSED WATER LINES
 - RESIDENCES
 - DEBRIS PILES



MARION PRESSURE TREATING COMPANY
MARION, LOUISIANA

FIGURE 1
SITE LAYOUT MAP

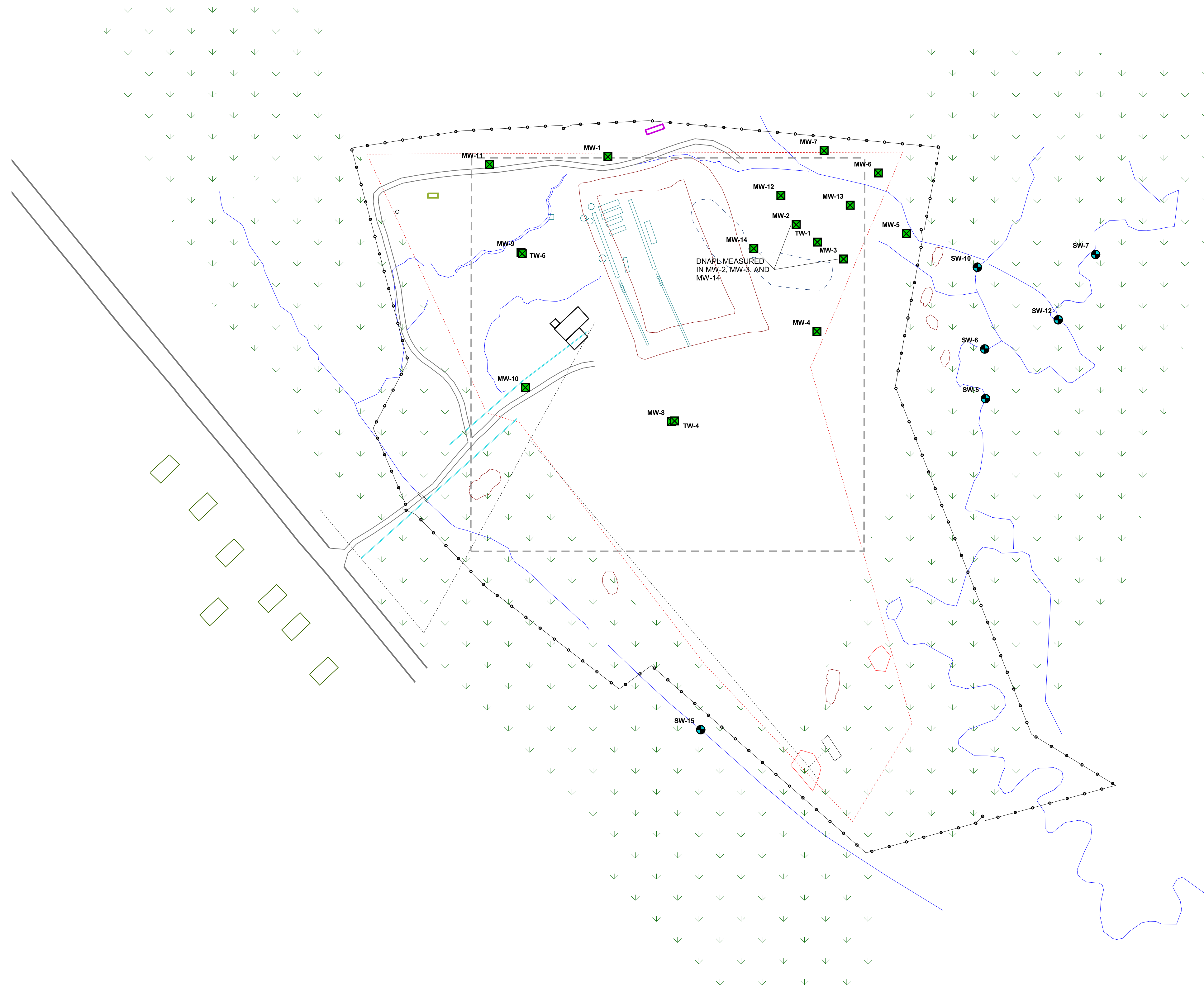
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LEGEND

- Surface Water Sample Locations
 - SW-12 ● Surface Water Sample Location
- Monitoring Well Locations
 - MW-11 ■ Monitoring Well Location
 - TW - Temporary Well Designation
- Site Features
 - NEW FENCE
 - STRUCTURES
 - SUMP
 - TANKER TRAILER
 - SHED
 - SOIL PILE
 - FORMER PROCESS AREA
 - - - FORMER SURFACE IMPOUNDMENT
 - - - CONSOLIDATION AREA
 - - - OPERATIONAL BOUNDARY
 - - - 10 ACRE TRACT
 - HIGHWAY
 - DIRT ROAD
 - CULVERT
 - STREAM
 - WETLANDS
 - ... OVERHEAD ELECTRICAL
 - EXPOSED WATER LINES
 - RESIDENCES
 - DEBRIS PILES



MARION PRESSURE TREATING COMPANY
MARION, LOUISIANA

FIGURE 2
LOCATION OF MONITORING WELLS
(FS FIGURE 7)

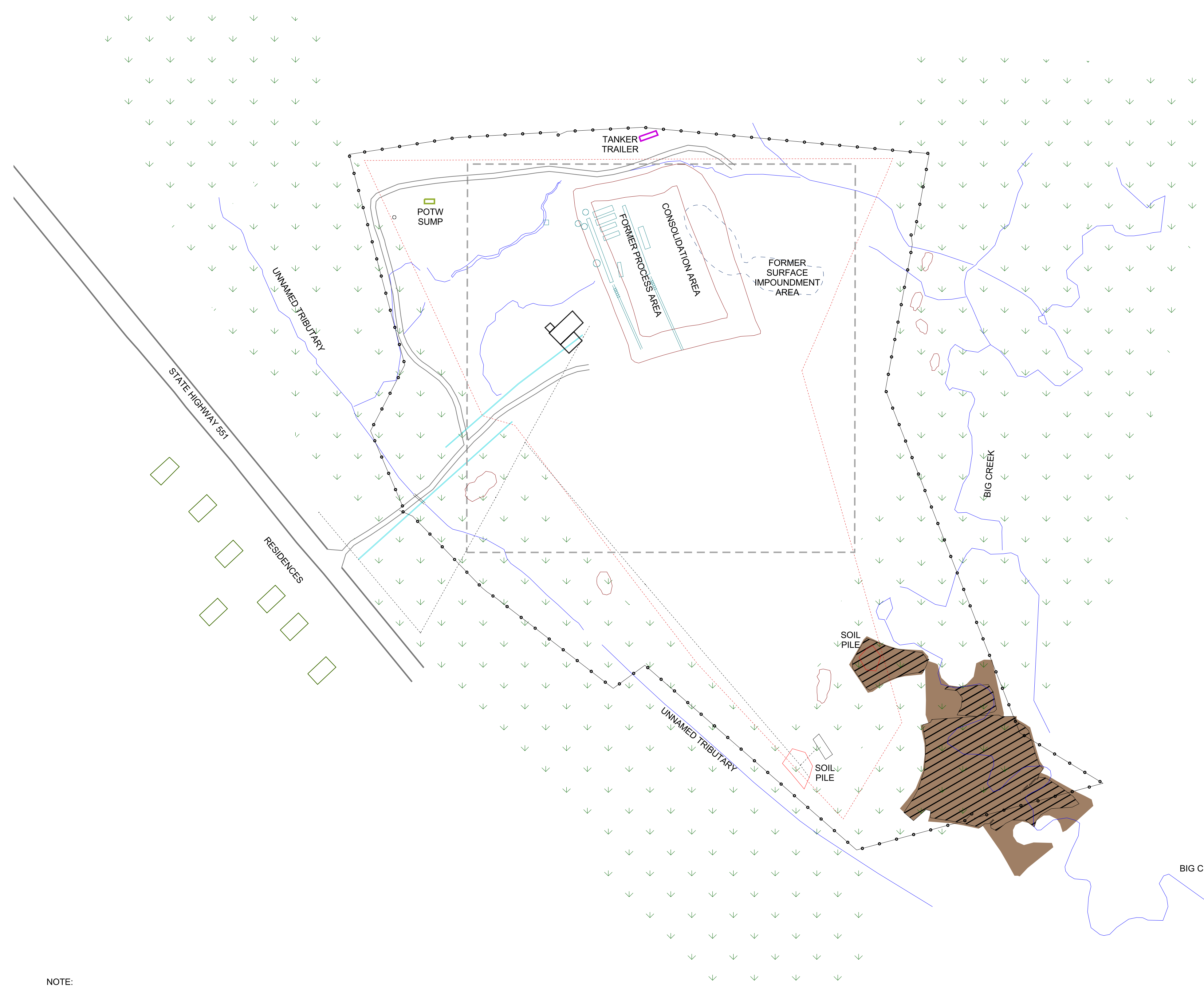
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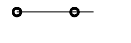









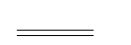

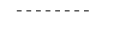





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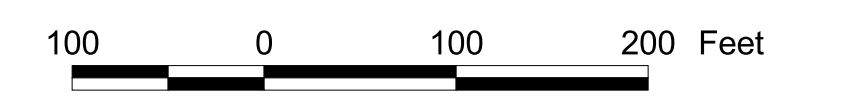


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LEGEND

-  AREAS EXCEEDING 42 MG/KG BAP EQUIVALENT CONCENTRATIONS (TRESPASSER SCENARIO)
-  AREAS EXCEEDING 26 MG/KG BAP EQUIVALENT CONCENTRATIONS (WORKER SCENARIO)
- Site Features
-  NEW FENCE
-  STRUCTURES
-  SUMP
-  TANKER TRAILER
-  SHED
-  SOIL PILE
-  FORMER PROCESS AREA
-  FORMER SURFACE IMPOUNDMENT
-  CONSOLIDATION AREA
-  OPERATIONAL BOUNDARY
-  10 ACRE TRACT
-  HIGHWAY
-  DIRT ROAD
-  CULVERT
-  STREAM
-  WETLANDS
-  OVERHEAD ELECTRICAL
-  EXPOSED WATER LINES
-  RESIDENCES
-  DEBRIS PILES



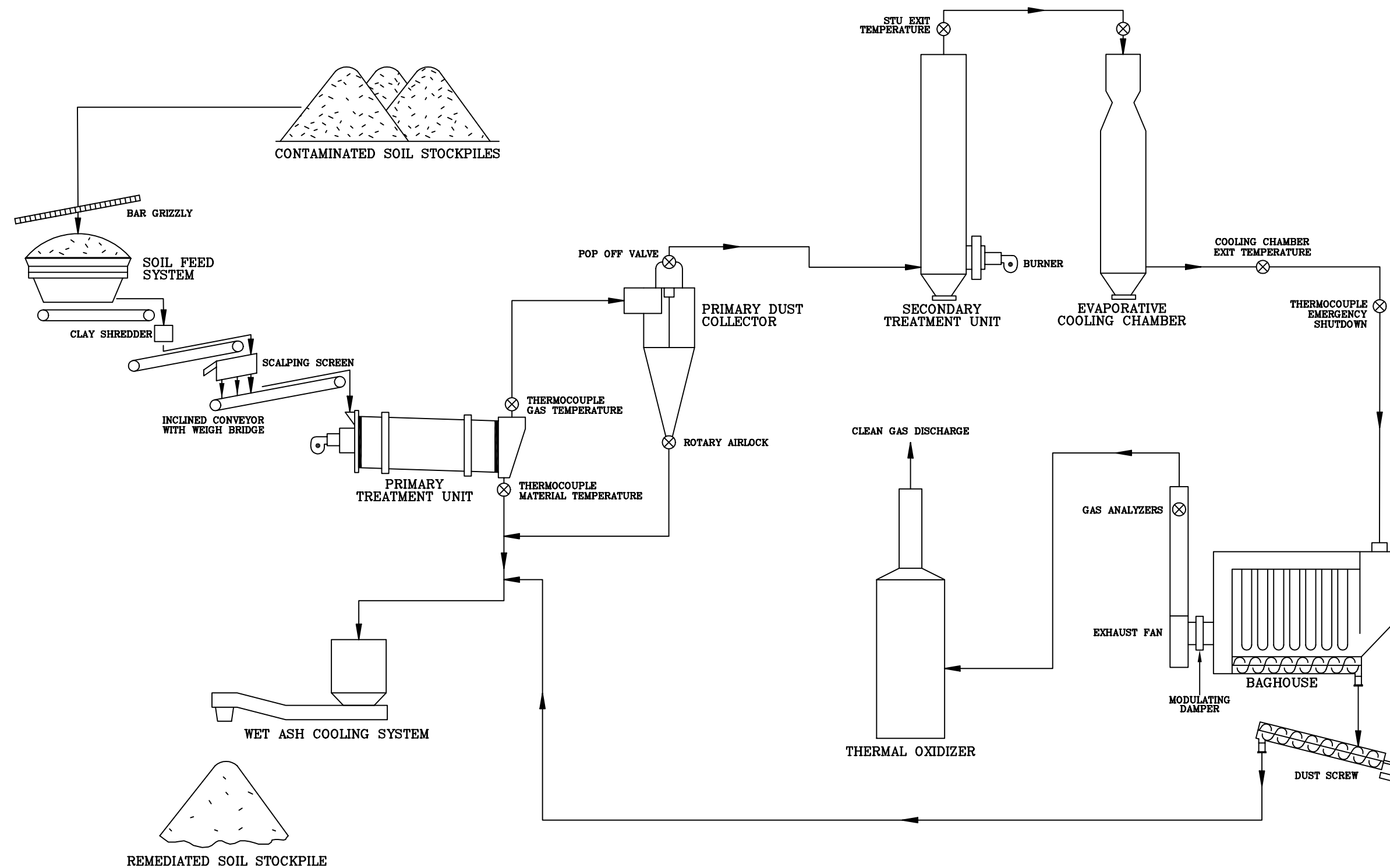
NOTE:
 COLORED AREAS REFLECT PRELIMINARY REMEDIATION GOALS (PRGS) BASED ON ACCEPTABLE CANCER RISK (1 IN 10,000) FOR SCENARIOS SHOWN IN LEGEND. THESE PRGS APPLY ONLY FOR DIRECT CONTACT WITH SURFACE AND NEAR SURFACE (0 TO 2 FEET BELOW GROUND SURFACE (FT BGS)) SOILS AND SURFACE (0 TO 0.5 FT BGS) SEDIMENTS. ALSO SEE FIGURE 7 FOR SURFACE AREA GROUNDWATER PROTECTION PRGS.

SOURCE: MODIFIED FROM M.J. DEFIELD AND COMPANY, AUGUST 2000.

MARION PRESSURE TREATING COMPANY
 MARION, LOUISIANA

FIGURE 4
 AREAS EXCEEDING B(a)P EQUIVALENT
 ACCEPTABLE CONCENTRATIONS
 (FS FIGURE 8)

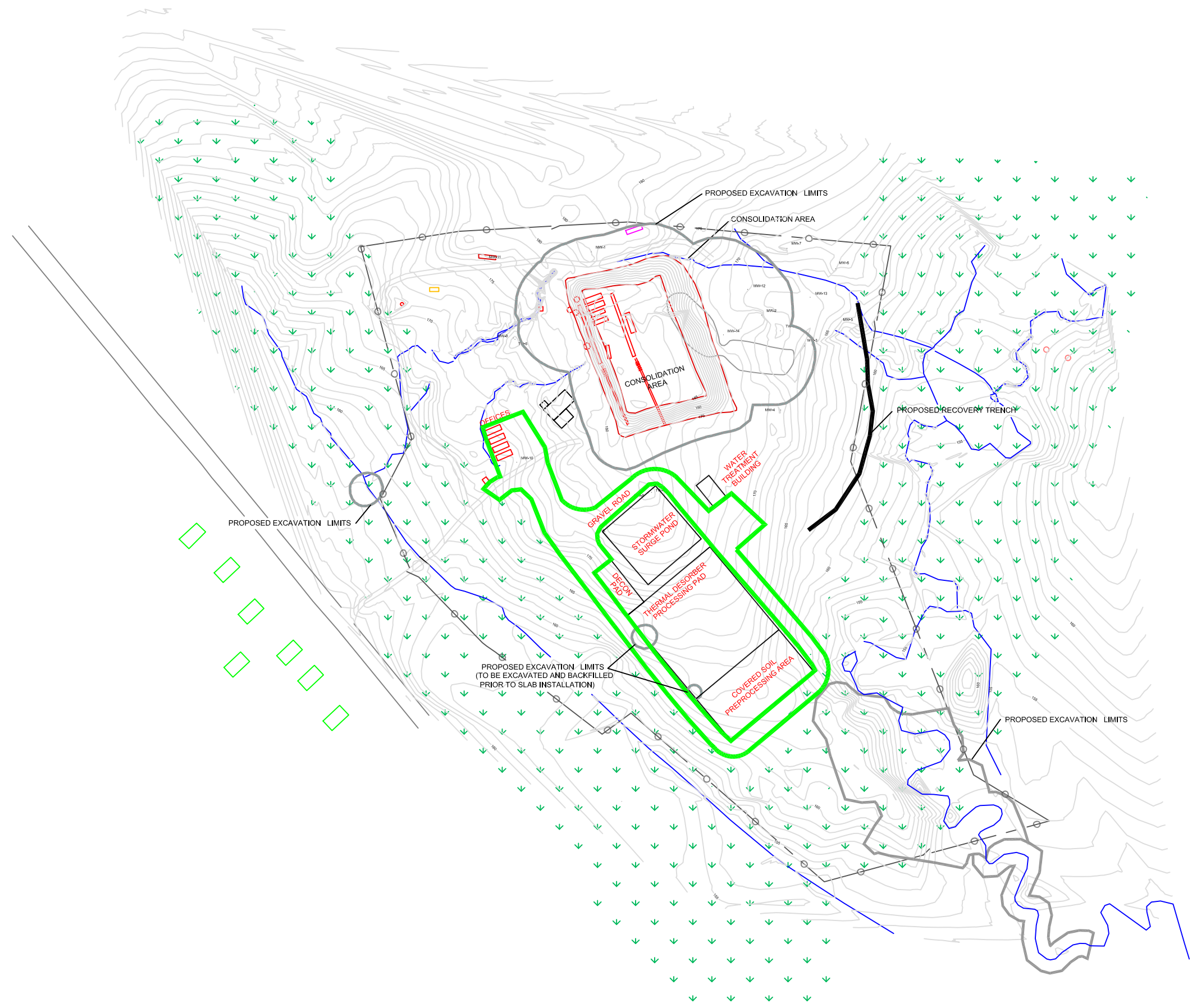
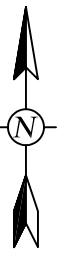
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MARION PRESSURE TREATING COMPANY
MARION, LOUISIANA

FIGURE 5
PROCESS FLOW DIAGRAM
(FS FIGURE 11)

PREPARED FOR:  BY: 



- LEGEND
- NEW FENCE
 - STRUCTURES
 - SUMP
 - TANKER TRAILER
 - FORMER SURFACE IMPOUNDMENT
 - CONSOLIDATION AREA
 - HIGHWAY
 - DIRT ROAD
 - ACCESS ROAD
 - STREAM
 - RESIDENCES
 - PROPOSED EXCAVATION LIMITS
 - PROPOSED RECOVERY TRENCH

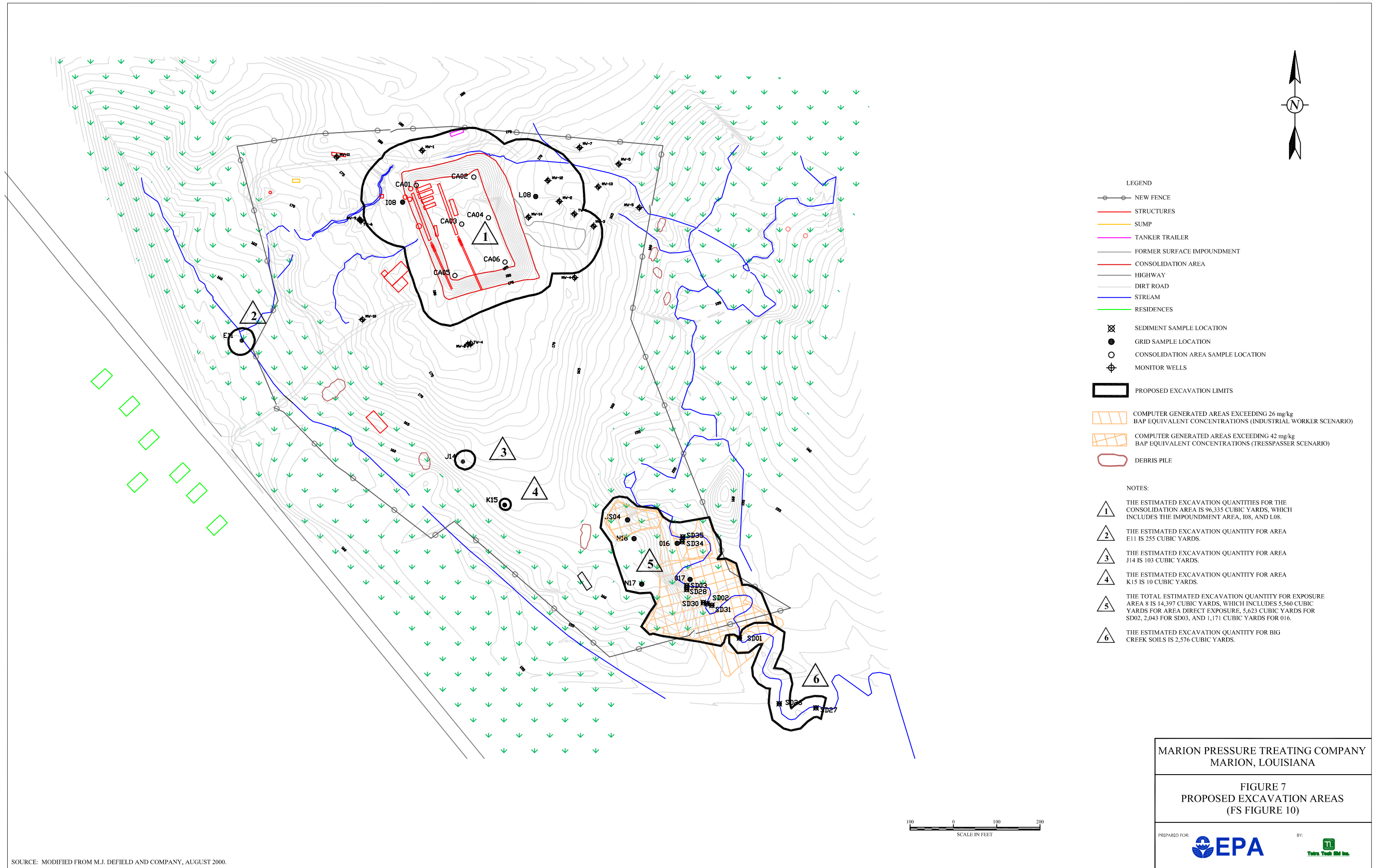


MARION PRESSURE TREATING COMPANY
MARION, LOUISIANA

FIGURE 6
CONCEPTUAL SITE LAYOUT
(FS FIGURE 12)

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**ROD Table1, revised HHRA Table 2.3
OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
MARION PRESSURE TREATING COMPANY**

Scenario Timeframe: Current/Future
Medium: Soil
Exposure Medium: Surface Soil
Exposure Point: On-site soil (Grid 0-2 ft)

CAS Number	Chemical	Minimum Concentration ⁽¹⁾	Minimum Qualifier	Maximum Concentration ⁽¹⁾	Maximum Qualifier	Units	Location of Maximum Concentration	Detection Frequency	Range of Detection Limits	Concentration ⁽²⁾ Used for Screening	Background ⁽³⁾ Value	Screening ⁽⁴⁾ Toxicity Value	Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for ⁽⁵⁾ Contaminant Deletion or Selection
91-57-6	2-Methylnaphthalene ^a	0.0019	LJ	470	LJ	mg/kg	O-16-6-24	40/260	0.0096-11	470	--	56 N	--	--	YES	ASL, HIST
83-32-9	Acenaphthene	0.0042	LJ	780		mg/kg	O-16-6-24	45/260	0.0096-11	780	--	3,683 N	--	--	YES	HIST
208-96-8	Acenaphthylene	0.016	LJ	37	LJ	mg/kg	JS-04-0-6	71/260	0.0093-13	37	--	--	--	--	YES	HIST
120-12-7	Anthracene	0.0027	LJ	760		mg/kg	O-16-0-6	120/260	0.0096-11	760	--	21,900 N	--	--	YES	HIST
7440-38-2	Arsenic	0.97	L	11.7		mg/kg	L-09-0-6	23/33	1.3-3.8	11.7	2.32	0.390 C	--	--	YES	ASL, TX, FD
56-55-3	Benzo(a)anthracene	0.0055	LJ	200	LJ	mg/kg	O-16-6-24	118/260	0.0096-3.5	200	--	0.622 C	--	--	YES	ASL, TX, HIST
50-32-8	Benzo(a)pyrene	0.0048	LJ	120	LJ	mg/kg	JS-04-0-6	111/260	0.0096-0.59	120	--	0.062 C	--	--	YES	ASL, TX, HIST
205-99-2	Benzo(b)fluoranthene	0.0089	LJ	160		mg/kg	JS-04-0-6	133/260	0.0096-0.59	160	--	0.622 C	--	--	YES	ASL, TX, HIST
191-24-2	Benzo(g,h,i)perylene	0.0035	LJ	32		mg/kg	JS-04-0-6	95/260	0.0096-13	32	--	--	--	--	YES	HIST
207-08-9	Benzo(k)fluoranthene	0.0065	LJ	120	LJ	mg/kg	JS-04-0-6	128-260	0.0096-0.59	120	--	6.22 C	--	--	YES	ASL, TX, HIST
86-74-8	Carbazole	0.036	LJ	140	LJ	mg/kg	1-08-6-24	81/260	0.33-11	140	--	24.3 C	--	--	YES	ASL, TX
218-01-9	Chrysene	0.008	LJ	210		mg/kg	O-16-0-6	132/260	0.0096-0.59	210	--	62.2 C	--	--	YES	ASL, TX, HIST
53-70-3	Dibenz(o,a,h)anthracene	0.02	LJ	22		mg/kg	JS-04-0-6	70/260	0.0093-160	22	--	0.062 C	--	--	YES	ASL, TX, HIST
132-64-9	Dibenzofuran	0.038	LJ	480		mg/kg	O-16-6-24	41/260	0.33-11	480	--	290.6 N	--	--	YES	ASL, TX, FD
206-44-0	Fluoranthene	0.0058	LJ	1200	Jv	mg/kg	1-08-6-24	143/260	0.33-0.41	1,200	--	2,294 N	--	--	YES	HIST
86-73-7	Fluorene	0.0033	LJ	610		mg/kg	O-16-6-24	55/260	0.0096-11	610	--	2,644 N	--	--	YES	HIST
193-39-5	Indeno(1,2,3-cd)pyrene	0.0044	LJ	41	LJ	mg/kg	JS-04-0-6	102/260	0.0096-13	41	--	0.62 C	--	--	YES	ASL, HIST
91-20-3	Naphthalene	0.005	LJv	750		mg/kg	O-16-6-24	36/260	0.0096-11	750	--	56.03 N	--	--	YES	ASL, TX, HIST
85-01-8	Phenanthrene	0.0067	LJ	1900	Jv	mg/kg	1-08-6-24	103/260	0.33-8.2	1,900	--	--	--	--	YES	HIST
129-00-0	Pyrene	0.03	LJ	780	Jv	mg/kg	1-08-6-24	140/260	0.0096-0.68	780	--	2,309 N	--	--	YES	HIST

Notes:

- a The Region 6 Medium Specific Screening Level (MSSL) for naphthalene for residential soil was used as a surrogate.
- b The MSSL for chlordane was used as a surrogate.
- c The MSSL for hexachlorocyclohexane-technical grade (BHC-technical) was used as a surrogate.
- d The MSSL for endosulfan was used as a surrogate.
- e The MSSL for endrin was used as a surrogate.
- f The MSSL for thallium chloride was used as a surrogate.
- g Polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans. Values are calculated as total toxic equivalency quotients. See Appendix E. Screening value is the Office of Solid Waste and Emergency Response cleanup value.

- (1) Minimum/maximum detected concentration.
- (2) The maximum concentration was used as the concentration used for screening.
- (3) Background values represent the arithmetic mean of off-site soil samples collected at Marion Pressure Treating Company. Analytical data is shown in Appendix B.
- (4) Screening values are risk-based screening levels from the Region 6 MSSL (August 2000b) for residential soil scenario.
- (5) Rationale Codes:

Selection Reason:	Associated historically (HIST)
	Frequent detection (FD)
	Toxicity information available (TX)
	Above screening levels (ASL)
Deletion Reason:	No Region 6 MSSL available (NTX)
	Essential nutrient (NUT)
	Below screening level (BSL)

- ARAR/TBC = Applicable or relevant and appropriate requirement/"to be considered" values
- B = The reported concentration is above 5X or 10X the concentration reported in the blank.
- C = Carcinogenic
- COPC = Contaminant of potential concern
- J = Estimated value
- L = Reported concentration is below the contract-required quantitation limit
- mg/kg = Milligram per kilogram
- N = Noncarcinogenic
- T = Identification is questionable because of absence of other commonly coexisting pesticides.
- v = Low biased. Actual concentration may be higher than the concentration reported.
- ^ = High biased. Actual concentration may be lower than the concentration reported.
- = Not available
- * Dioxin screening value is based on the Office of Solid Waste and Emergency Response residential preliminary remediation goal of 0.001 mg/kg, and therefore is not directly based on a 1E-06 cancer risk.

**ROD Table 2, revised HHRA Table 2.9
 OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
 MARION PRESSURE TREATING COMPANY**

Scenario Timeframe: Future
Medium: Ground Water
Exposure Medium: Ground Water
Exposure Point: Cockfield Aquifer

CAS Number	Chemical	Minimum Concentration ⁽¹⁾	Minimum Qualifier	Maximum Concentration ⁽¹⁾	Maximum Qualifier	Units	Location of Maximum Concentration	Detection Frequency	Range of Detection Limits	Concentration Used for Screening ⁽²⁾	Background Value	Screening Toxicity Value ⁽³⁾	Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for Contaminant Deletion or Selection ⁽⁴⁾
91-57-6	2-Methylnaphthalene ^a	110	LJ	164		ug/L	MW-3	1/13	5-10	164.0	--	6.20 N	--	--	YES	ASL, HIST
83-32-9	Acenaphthene	140	LJ	238		ug/L	MW-3	2/13	5-10	238	--	365 N	--	--	YES	HIST
208-96-8	Acenaphthylene	3.1		3.1		ug/L	MW-3	1/13	5-10	3.10	--	--	--	--	YES	HIST
120-12-7	Anthracene	16.9		16.9		ug/L	MW-3	1/13	5-180	16.9	--	1,825 N	--	--	YES	HIST
7440-38-2	Arsenic	3.5	L	20.5		ug/L	MW-6	4/14	3-10	20.5	--	0.045 C	50	EPA 2000b	YES	ASL, FD
71-43-2	Benzene	1	LJ	3	LJ	ug/L	MW-8	2/14	1.0-10	3	--	0.42 C	5	EPA 2000b	YES	ASL, TX, FD
117-81-7	Bis(2-ethylhexyl)phthalate	1	LJ	7		ug/L	MW-7	5/13	5-180	7	--	4.8 C	6	EPA 2000b	YES	ASL, TX, FD
132-64-9	Dibenzofuran	84	LJ	149		ug/L	MW-3	2/13	5-10	149.0	--	24.3 N	--	--	YES	ASL, TX
206-44-0	Fluoranthene	21	LJ	59.7		ug/L	MW-3	2/13	1-10	59.7	--	1,460 N	--	--	YES	HIST
86-73-7	Fluorene	78	LJ	152		ug/L	MW-3	2/13	5-10	152	--	243 N	--	--	YES	HIST
91-20-3	Naphthalene	258		570		ug/L	MW-14	2/13	5-10	570	--	6.2 N	--	--	YES	ASL, HIST
85-01-8	Phenanthrene	150	LJ	265		ug/L	MW-3	2/13	5-10	265.0	--	--	--	--	YES	HIST
129-00-0	Pyrene	39.9		39.9		ug/L	MW-3	1/13	5-180	39.9	--	183 N	--	--	YES	HIST
7440-28-0	Thallium ^b	8	LJ	13		ug/L	MW-5	3/14	2.7-8	13	--	2.9 N	2	EPA 2000b	YES	ASL

Notes:

a The Region 6 Medium Specific Screening Level (MSSL) for naphthalene for residential soil was used as a surrogate.

b The MSSL for thallium chloride was used as a surrogate.

(1) Minimum/maximum detected concentration

(2) The maximum concentration was used as the concentration used for screening.

(3) Screening values are risk-based screening levels from the Region 6 MSSSLs (August 2000) for residential tap water.

(4) Rationale Codes

Selection Reason:	Associated historically (HIST)
	Frequent detection (FD)
	Toxicity information available (TX)
	Above screening levels (ASL)
Deletion Reason:	No Region 6 MSSSL available (NTX)
	Essential nutrient (NUT)
	Below screening level (BSL)

ARAR/TBC = Applicable or relevant and appropriate requirement/"to be considered" values

C = Carcinogenic

COPC = Contaminant of potential concern

J = Estimated value

L = Reported concentration is below the Contract Required Quantitation Limit

N = Noncarcinogenic

ug/L = Micrograms per liter

-- = Not available

ROD Table 3, revised from HHRA Table 2.10
OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
MARION PRESSURE TREATING COMPANY

Scenario Timeframe: Current/Future
 Medium: Sediment
 Exposure Medium: Sediment
 Exposure Point: Big Creek and East Ditch (0 - 6 in) - Hot Spots (SD01, SD02, SD03)

CAS Number	Chemical	Minimum Concentration ⁽¹⁾	Minimum Qualifier	Maximum Concentration ⁽¹⁾	Maximum Qualifier	Units	Location of Maximum Concentration	Detection Frequency	Range of Detection Limits	Concentration Used for Screening ⁽²⁾	Background Value ⁽³⁾	Screening Toxicity Value ⁽⁴⁾	Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for Contaminant Deletion or Selection ⁽⁵⁾
91-57-6	2-Methylnaphthalene ^a	0.021	LJ	5,800	LJ	mg/kg	SD-03-0-6	2/3	13	5,800	--	56 N	--	--	YES	ASL, HIST
83-32-9	Acenaphthene	72	JV	8400	LJ	mg/kg	SD-03-0-6	3/3		8,400	--	3,683 N	--	--	YES	ASL, HIST
208-96-8	Acenaphthylene	7.4	LJV	140	LJ	mg/kg	SD-03-0-6	3/3		140	--	--	--	--	YES	HIST
120-12-7	Anthracene	820	JV	41,000	J ^b	mg/kg	SD-03-0-6	3/3		41,000	--	21,900 N	--	--	YES	ASL, HIST
7440-38-2	Arsenic	3.5	J	3.5	J	mg/kg	SD-03-0-6	1/3	2-2.5	3.5	--	0.39 C	--	--	YES	ASL, HIST
56-55-3	Benzo(a)anthracene	220	LJV	1,400		mg/kg	SD-03-0-6	3/3		1,400	--	0.62 C	--	--	YES	ASL, HIST
50-32-8	Benzo(a)pyrene	100	JV	410		mg/kg	SD-03-0-6	3/3		410	--	0.062 C	--	--	YES	ASL, HIST
205-99-2	Benzo(b)fluoranthene	120	LJV	670		mg/kg	SD-03-0-6	3/3		670	--	0.62 C	--	--	YES	ASL, HIST
191-24-2	Benzo(g,h,i)perylene	26	JV	91	LJ	mg/kg	SD-03-0-6	3/3		91	--	--	--	--	YES	HIST
207-08-9	Benzo(k)fluoranthene	140	LJ	360		mg/kg	SD-03-0-6	3/3		360	--	6.2 C	--	--	YES	ASL, HIST
86-74-8	Carbazole	6.4	LJV	12,000	J	mg/kg	SD-03-0-6	3/3		12,000	--	24.3 C	--	--	YES	ASL, HIST
218-01-9	Chrysene	310	JV	1,800		mg/kg	SD-03-0-6	3/3		1,800	--	62.2 C	--	--	YES	ASL, HIST
53-70-3	Dibenzo(a,h)anthracene	7.7	LJV	35	LJ	mg/kg	SD-03-0-6	2/3	170	35	--	0.062 C	--	--	YES	ASL, HIST
132-64-9	Dibenzofuran	3.7	LJV	9,700	LJB	mg/kg	SD-03-0-6	3/3		9,700	--	291 N	--	--	YES	ASL, HIST
206-44-0	Fluoranthene	1200	JV	12,000	LJB	mg/kg	SD-03-0-6	3/3		12,000	--	2,294 N	--	--	YES	ASL, HIST
86-73-7	Fluorene	39	JV	20,000	B	mg/kg	SD-03-0-6	3/3		20,000	--	2,644 N	--	--	YES	ASL, HIST
193-39-5	Indeno(1,2,3-cd)pyrene	51	LJ	120	LJ	mg/kg	SD-03-0-6	3/3		120	--	0.62 C	--	--	YES	ASL, HIST
91-20-3	Naphthalene	150	LJ	3,000	LJ	mg/kg	SD-03-0-6	2/3	13	3,000	--	56 N	--	--	YES	ASL, HIST
85-01-8	Phenanthrene	91	LJV	45,000	B	mg/kg	SD-03-0-6	3/3		45,000	--	--	--	--	YES	HIST
129-00-0	Pyrene	890	JV	9,300	LJB	mg/kg	SD-03-0-6	3/3		9,300	--	2,309 N	--	--	YES	ASL, HIST

Notes:

- a The Region 6 Medium Specific Screening Level (MSSL) for naphthalene for residential soil was used as a surrogate.
- b The MSSL for chlordanes was used as a surrogate.
- c The MSSL for hexachlorocyclohexane-technical grade (BHC-technical) was used as a surrogate.
- d The MSSL for endosulfan was used as a surrogate.
- e The MSSL for endrin was used as a surrogate.
- f Polychlorinated dibenzo-p-dioxins/olychlorinated dibenzofurans. Values are calculated as total toxic equivalency quotients. See Appendix E.

- (1) Minimum/maximum detected concentration
- (2) The maximum concentration was used as the concentration used for screening.
- (3) Background values derived from statistical analysis. Supporting information provided in Section 3.3.4
- (4) Screening values are Risk-based screening levels from the Region 6 MSSL (August 2000) for residential soil scenario.
- (5) Rationale Codes:
 - Selection Reason:
 - Associated historically (HIST)
 - Toxicity information available (TX)
 - Above screening levels (ASL)
 - Deletion Reason:
 - No Region 6 MSSL available (NTX)
 - Essential nutrient (NUT)
 - Below screening level (BSL)

- ARAR/TBC = Applicable or relevant and appropriate requirement/"to be considered" values
- B = The reported concentration is above 5X or 10X the concentration reported in the blank.
- C = Carcinogenic
- COPC = Contaminant of potential concern
- J = Estimated value
- L = Reported concentration is below the contract-required quantitation limit
- mg/kg = Milligram per kilogram
- N = Noncarcinogenic
- T = Identification is questionable because of absence of other commonly coexisting pesticides.
- v = Low biased. Actual concentration may be higher than the concentration reported.
- ^ = High biased. Actual concentration may be lower than the concentration reported.
- * = Result not recommended for use because of associated QA/QC performance inferior to that from other analysis
- = Not available
- * Dioxin screening value is based on the Office of Solid Waste and Emergency Response residential preliminary remediation goal of 0.001 mg/kg, and therefore is not directly based on a 1E-06 cancer risk.

**ROD Table 4, revised HHRA Table 2.13
OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
MARION PRESSURE TREATING COMPANY**

Scenario Timeframe: Current/Future
Medium: Soil, All Depths
Exposure Medium: Soil-to-ground water leaching
Exposure Point: On-site grid soil

CAS Number	Chemical	Minimum (1) Concentration	Minimum Qualifier	Maximum (2) Concentration	Maximum Qualifier	Units	Location (5) of Maximum Concentration	Detection Frequency	Range of Detection Limits	Concentration Used for Screening	Background Value ⁽²⁾	Screening Toxicity Value ⁽³⁾	Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for Contaminant Deletion or Selection ⁽⁴⁾
91-57-6	2-Methylnaphthalene	0.0019	LJ	640	Jv	mg/kg	L-08-258-282	67/313	0.0096-11	640	--	170 b	--	--	YES	ASL
106-44-5	4-Methylphenol	0.11	LJ	4.3	LJ	mg/kg	I-08-168-192	6/284	0.00033-0.16	4.3	--	0.63 b	--	--	YES	ASL
83-32-9	Acenaphthene	0.0042	LJ	1100	Jv	mg/kg	L-08-258-282	74/272	0.0096-11	1100	--	220 a	--	--	YES	ASL
120-12-7	Anthracene	0.0027	LJ	760	Jv	mg/kg	O-16-0-6	149/131	0.0096-11	760	--	120 a	--	--	YES	ASL
56-55-3	Benzo(a)anthracene	0.0055	LJ	200	LJ	mg/kg	O-16-6-24	145/313	0.0096-3.5	200	--	8.6 a	--	--	YES	ASL
50-32-8	Benzo(a)pyrene	0.0048	LJ	120	LJ	mg/kg	JS-04-0-6	131/313	0.0096-120	120	--	23 a	--	--	YES	ASL
205-99-2	Benzo(b)fluoranthene	0.0089	LJ	160	Jv	mg/kg	JS-04-0-6	161/313	0.0096-58	160	--	29 a	--	--	YES	ASL
86-74-8	Carbazole	0.036	LJ	140	LJ	mg/kg	I-08-6-24	102/313	0.330-24	140	--	4.6 b	--	--	YES	ASL
218-01-9	Chrysene	0.008	LJ	210	Jv	mg/kg	O-16-0-6	162/313	0.0096-0.590	210	--	76 a	--	--	YES	ASL
132-64-9	Dibenzofuran	0.038	LJ	720	Jv	mg/kg	L-08-258-282	70/313	0.330-11	720	--	24 a	--	--	YES	ASL
206-44-0	Fluoranthene	0.0058	LJ	1200	Jv	mg/kg	L-08-258-282	176/313	0.33-0.43	1200	--	1200 a	--	--	YES	ASL
86-73-7	Fluorene	0.0033	LJ	820	Jv	mg/kg	L-08-258-282	84/313	0.0096-11	820	--	230 a	--	--	YES	ASL
193-39-5	Indeno(1,2,3-cd)pyrene	0.0044	LJ	41	LJ	mg/kg	JS-04-0-6	108/295	0.0096-120	41	--	9.2 a	--	--	YES	ASL
91-20-3	Naphthalene	0.005	LJ	1600	Jv	mg/kg	L-08-258-282	64/313	0.0096-11	1600	--	1.5 a	--	--	YES	ASL
85-01-8	Phenanthrene	0.0067	LJ	2200	Jv	mg/kg	L-08-258-282	134/313	0.33-8.2	2200	--	420 b	--	--	YES	ASL

Notes:

- | | |
|---|---|
| <p>(1) Minimum/maximum detected concentration</p> <p>(2) N/A - Background sediment samples were not collected.</p> <p>(3) a = Louisiana Department of Environmental Quality. 2000. Risk Evaluation / Corrective Action Program (RECAP).
b = Texas Natural Resource Conservation Commission. 1999. Title 30 of the Texas Administrative Code. Chapter 350.
c = The RECAP value for chlordane was used for alpha-chlordane.
d = The RECAP value for alpha-BHC was used for delta-BHC.
e = The RECAP value for endosulfan I was used for endosulfan II and endosulfan sulfate.
f = The RECAP value for endrin was used for endrin aldehyde and endrin ketone.</p> <p>(4) Rationale Codes
Selection Reason: Above screening levels (ASL)
Deletion Reason: Essential nutrient (NUT)
Below screening level (BSL)
Infrequent detection (IFD)</p> | <p>(5) The last two digits in the location of maximum concentration reflect the depth interval (in inches) at which the maximum concentration was detected.</p> <p>ARAR/TBC = Applicable or relevant and appropriate requirement/"to be considered" values
B = This result may be high biased because of laboratory/field contamination. The reported concentration is above 5X or 10X the concentration reported in the method/field blank.
COPC = Contaminant of potential concern
J = Estimated value
L = Reported concentration is below the contract required quantitation limit
T = Identification is questionable because of absence of other commonly coexisting pesticides
^ = High biased. A
v = Low biased. Actual concentration may be higher than the concentration reported.
-- = Not available</p> |
|---|---|

ROD Table 5, source HHRA Table 3
NONCANCER HAZARD INDEX SUMMARY

Receptor	Media	Noncancer HI ^a	Risk Driver(s) ^b (media)
Trespasser/recreational visitor (Adolescent)	Surface water (Big Creek)	0.036	Arsenic (crayfish) Barium (crayfish) Manganese (crayfish)
	Surface water (Unnamed Tributary)	0.031	
	Surface soil (grid system)	0.0043	
	Surface soil (consolidation area)	0.000056	
	Airborne particulates and vapors	0.00032	
	Sediment (Big Creek)	0.005	
	Sediment (Unnamed Tributary)	0.0033	
	Crayfish	10	
	Total (all media, all routes)	10	
Sediment (Big Creek-hot spots)	3.7		
Total (all media, all routes, hot spot scenario)	13.7		
Off-site Resident (Adult)	Airborne particulates and vapors	0.0011	N/A
Off site Resident (Child)	Airborne particulates and vapors	0.0017	N/A
Industrial Worker	Surface soil (grid system)	0.0075	Thallium (Ground water)
	Surface Soil (consolidation area)	0.0001	
	Airborne particulates and vapors	0.001	
	Ground water	3.2	
	Total (all media, all routes)	3.2	
On-site Resident (Adult)	Surface soil (grid system)	0.016	Arsenic (Ground water) Dibenzofuran (Ground water) Naphthalene (Ground water) Thallium (Ground water)
	Surface soil (consolidation area)	0.00017	
	Airborne particulates and vapors	0.0011	
	Ground water	11	
	Total (all media, all routes)	11	
On-site Resident (Child)	Surface soil (grid system)	0.14	Arsenic (Ground water) Dibenzofuran (Ground water) Naphthalene (Ground water) Thallium (Ground water)
	Surface soil (consolidation area)	0.0014	
	Airborne particulates and vapors	0.0017	
	Ground water	24	
	Total (all media, all routes)	24	

Notes:

- a A hazard index (HI) greater than 1 is considered an excess risk for non-carcinogenic health effects.
- b Constituents with a combined exposure route HI index greater than 1.0.
- N/A As the HI for this receptor was less than 1.0, no constituents were identified as risk drivers.

ROD Table 6, source FS Table 4

CARCINOGENIC RISK SUMMARY

Receptor	Media	Carcinogenic Risk ^a	Risk Driver(s) ^b (media)
Trespasser/recreational visitor (Adolescent)	Surface water (Big Creek)	2.9E-08	Benzo(a)pyrene (Big Creek sediment)
	Surface water (Unnamed Tributary)	---	
	Surface soil (grid system)	5.4E-07	
	Surface soil (consolidation area)	4.2E-07	
	Air	4.0E-10	
	Sediment (Big Creek)	3.9E-04	
	Sediment (Unnamed Tributary)	2.5E-06	
	Crayfish	8.2E-05	
	Total (all media, all routes)	4.7E-04	
	Sediment (Big Creek-hot spots)	5.1E-04	
Total (all media, all routes, hot spot scenario)	6.0E-04		
Off-site Resident (Adult)	Airborne particulates and vapors	4.0E-09	N/A
Off-site Resident (Child)	Airborne particulates and vapors	1.2E-09	N/A
Industrial Worker	Surface soil (grid system)	2.5E-06	Arsenic (ground water)
	Surface Soil (consolidation area)	2.0E-06	
	Airborne particulates and vapors	2.5E-09	
	Ground water	1.1E-04	
	Total (all media, all routes)	1.1E-04	
On-site Resident (Adult)	Surface soil (grid system)	5.3E-06	Arsenic (ground water)
	Surface soil (consolidation area)	3.7E-06	
	Airborne particulates and vapors	4.0E-09	
	Ground water	3.7E-04	
	Total (all media, all routes)	3.8E-04	
On-site Resident (Child)	Surface soil (grid system)	9.1E-06	Arsenic (ground water)
	Surface soil (consolidation area)	6.3E-06	
	Airborne particulates and vapors	1.2E-09	
	Ground water	1.7E-04	
	Total (all media, all routes)	1.9E-04	

Notes:

a Cancer risks above 1×10^{-4} are generally considered unacceptable.

b Constituents with a combined exposure route cancer risk greater than 1×10^{-4} .

N/A As the carcinogenic risk for this receptor was less than 10^{-6} , no constituents were identified as risk drivers.

ROD Table 7, source FS Table 6

**SITE-SPECIFIC GROUND WATER PROTECTION
PRELIMINARY REMEDIATION GOALS**

Contaminant of Potential Concern	Sediment Concentration (mg/kg)		Grid Area Soil Concentration (mg/kg)		Consolidation Area Soil Concentration (mg/kg)	
	RECAP Value	Site-Specific Value	RECAP Value	Site-Specific Value	RECAP Value	Site-Specific Value
Benzo(a)anthracene	8.6	19.34	8.6	9.47	8.6	9.47
Benzo(a)pyrene	23	52.35	23	25.62	23	25.62
Benzo(b)fluoranthene	29	66.45	29	32.52	29	32.52
Benzo(k)fluoranthene	120	302.34	120	147.96	120	147.96
Chrysene	76	978.34	76	478.78	76	478.78
Dibenzo(a,h)anthracene	540	4835.10	540	2366.13	540	2366.13
Indeno(1,2,3-cd)pyrene	9.2	374.92	9.2	183.47	9.2	183.47
Acenaphthene	410	491.21	410	241.01	410	241.00
Anthracene	120	11384.44	120	5574.15	120	5574.12
Biphenyl	190 ^a	418.04	190 ^a	205.46	190 ^a	205.45
Carbazole	4.6	20.00	4.6	9.85	4.6	9.85
Dibenzofuran	24	50.66	24	24.83	24	24.83
Fluoranthene	1200	19899.94	1200	9740.80	1200	9740.77
Fluorene	230	500.78	230	245.47	230	245.46
Naphthalene	1.5	3.26	1.5	1.61	1.5	1.61
2-Methylnaphthalene	170	1785.02	170 ^a	878.86	N/A	N/A
Phenanthrene	420	4195.67	420 ^a	2055.65	420 ^a	2055.62
Pyrene	1100	3306.92	1100	1618.58	1100	1618.58

Notes:

^a This value was calculated using Louisiana Risk Evaluation/Corrective Action Program (RECAP) RECAP methodology and chemical specific parameters from the Texas Natural Resource Conservation Commission Risk Reduction Rule (TN RCC 1999). Chemical specific parameters for this compound are not available in RECAP.

N/A Not a contaminant of potential concern in this media.

TABLE 8

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Chemical Specific				
Federal Drinking Water Regulations	40 CFR Part 141 and Part 143	MCLGs	Ground water	CERCLA requires that MCL for inorganics and organics generally be considered "relevant and appropriate for ground water remediation.
Action Specific				
Solid Waste	LAC 33:VII, Chapter 1 and 3	Solid waste, such as nonhazardous contaminated waste soils and debris generated through industrial activities subject to the requirements of RCRA Subtitles D and C, and the provisions of the Louisiana Solid Waste Regulations (LSWR)	Soils, debris	Regulations require that persons generating, collecting, transporting, storing, processing, and disposing of solid waste comply with the notification requirements for facilities and landfills under the LSWR. LAC 33:VII, Chapter 7 specifies requirements which all generators of industrial solid waste must comply.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
RCRA	LAC 33:V.Chapter 11 (40 CFR Part 261 and Part 262)	Establish the requirements for hazardous waste determination, EPA generator identification, waste manifests and shipments, pretransport activities, and generator record keeping and reporting activities.	Soils and residuals	Creosote DNAPL and creosote-contaminated debris on site are expected to be classified as F034 listed wastes. As such, these wastes are land disposal prohibited as described in 40 CFR 268.30. The materials will require incineration as the only disposal option.
RCRA	LAC 33:V Section 903	Manifest requirements	Hazardous waste	Required information for manifest forms for shipments of hazardous waste within the State of Louisiana.
RCRA	LAC 33:V Section 913	Manifest document flow	Hazardous waste	Outlines manifest document flow and procedures from the generator, transporter, and hazardous waste facility operator.
Action Specific (Continued)				

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
RCRA	LAC 33:V Section 1107	The manifest system	Hazardous waste	Specific manifest requirements for generators of hazardous waste.
RCRA	LAC 33:V Section 1108	Manifest system emergency response information	Hazardous waste	Generators must provide guidelines for an emergency situation involving the hazardous waste to accompany the manifest.
RCRA	LAC 33:V Section 1109	Pre-transport requirements	Hazardous waste	Packaging, labeling, and other requirements for generators prior to shipment of hazardous wastes.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
RCRA Hazardous Waste Burned in Boilers and Industrial Furnaces	40 CFR 266 Subpart H	The Boiler and Industrial Furnace Final Rule was promulgated by EPA on August 21, 1991. This rule expanded control on hazardous waste combustion by regulating the burning of hazardous waste in boilers and industrial furnaces (BIF). BIFs are now subject to essentially the same general facility standards as are other RCRA treatment, storage, and disposal facilities. Topics covered by 40 CFR 266 Subpart H include management prior to burning, permit standards and interim status standards, emissions control, exemptions, and regulation of residues.	Media soils and sediments	Applicable to the MPTC site, since the selected remedy includes thermal desorption.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
RCRA Permits and Enforcement	CERCLA § 121(e), 42 U.S.C. § 9612(e)	This section specifies that no “federal, state, or local permit” shall be required for any portion of a CERCLA remedial action that is conducted on the site of the facility being remediated. This includes exemption from the RCRA permitting process.		
RCRA	LAC 33: V Chapter 22	Thermal treatment technologies that generate F034 hazardous soil and debris waste that produce a residue.	Soil, residues	This residue will not require further treatment prior to disposal.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Clean Air Act	42 USC § 7475, 40 CFR § 52.21	<p>Prevention of Significant Deterioration of Air Quality</p> <p>These provisions impose various requirements (e.g., use of best available control technology) on any new major stationary source of a federally regulated air pollutant in an area that has been designated attainment or unclassifiable for that pollutant.</p>		<p>A “major stationary source” is a source listed in 40 CFR § 52.21 that emits, or has the potential to emit, 100 tons per year of a federally regulated air pollutant or any nonlisted source that emits, or has the potential to emit, 250 tons per year of a federally regulated air pollutant. Activities at MPTC are not expected to constitute a major stationary source of any federally regulated air pollutant, but this requirement is relevant and appropriate.</p>

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Clean Air Act	LAC 33:III Chapter 13.	Remedial cleanup actions resulting in the generation of airborne particulate matter from the excavation of contaminated soils, earth moving, and regrading must be evaluated.	Surface soil, particulate	These regulations call for the control of fugitive emissions by taking measures to prevent particulate matter and suspended particulate matter from becoming airborne. Also, air emissions cannot exceed the maximum allowable emission range for any hazardous air pollutant or Tap.
Clean Air Act	LAC 33:III Section 905	States air pollution control facilities should be installed whenever practically, economically, and technically feasible even though the ambient air quality standards in the affected area are not exceeded.	Soils	This requirement is relevant and appropriate for thermal treatment.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Clean Air Act	LAC 33:III Section 1305	Requires that all reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including use of water or chemicals for control of dust in the demolition of existing structures, construction operations, clearing of land, and on dirt roads or stockpiles.	Abandoned buildings and structures	Applicable during the demolition of buildings, transport of soils, or any other activity that may generate airborne particulate matter at MPTC.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Clean Air Act	LAC 33:III.Chapter 1	States that sources of emissions existing partially or wholly within the State of Louisiana must comply with the regulations, air quality standards, and emission limitations of that part.	Air	In accordance with the Louisiana Revised Statutes 30:2060 and 30:2001, emissions from the remediation of a RCRA, CERCLA, or any non-regulated inactive or abandoned waste site cleanup shall be exempt from the ambient air standards upon approval of the cleanup plan by the administrative authority.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Clean Water Act	33 USC 1251 to 1376	Provides authority for each state to adopt water quality standards designed to protect beneficial uses of each water body and requires states to designate uses for each water body.	Surface water	For remedial actions at the MPTC site involving construction and excavation of contaminated soil, engineering controls designed to prevent discharges that may affect the water quality of nearby surface waters must be implemented. Discharge will meet storm water and wastewater discharge monitoring requirements established by LDEQ.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Action Specific (Continued)				
Transportation	49 CFR Part 171	Hazardous materials that may be transported off the MPTC site cannot be transported in interstate and intrastate commerce, except in accordance with the requirements of 49 CF 171, Subpart C.	Hazardous waste	Hazardous waste or environmentally hazardous substances transported within the state must comply with the applicable packaging, labeling, marking, and placarding requirements of 49 CFR 171, Subpart C and/or Louisiana Hazardous Material Regulations Subchapter C, and the Department of Public Safety under LAC33:V, Subpart 2, Chapter 101.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Location Specific				
Floodplain Management Order, Executive Order No. 11988	40 CFR 6 Appendix A	Dictates that federally funded or authorized actions within the 100-year floodplain avoid, to the maximum extent possible, adverse impacts associated with the development of a floodplain.	Land, buildings, and resources	Specific measures to minimize adverse impacts will be identified following consultation with the appropriate agencies during the remedial design phase prior to implementation of a selected remedy.
Protection of Wetlands Order, Executive Order No. 11990	40 CFR 6 Appendix A	Mandates that federal agencies and potentially responsible parties avoid, to the extent possible, the adverse impacts associated with the destruction or loss of wetlands and avoid support of new construction in wetlands if a practicable alternative exists.	Land, buildings, and resources	Specific measures to minimize adverse impacts will be identified following consultation with the appropriate agencies during the remedial design phase prior to implementation of a selected remedy.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Location Specific (Continued)				
National Archeological and Historic Preservation Act National Historic Preservation Act	16 USC 468 16 USC 470 40 CFR 6.301(c) 36 CFR Part 800	Provides for preservation of historical and archaeological sites that might be destroyed through alteration of terrain as a result of a Federal construction project or a Federally licensed activity or program.	Land, buildings, and resources	Based on the available information, the MPTC site is not located in an area affected by these acts.
Fish and Wildlife Coordination Act	16 USC § 661 et seq., 16 USC § 742 a, 16 USC § 2901	Requires adequate provision for protection of fish and wildlife resources.	Media is soils and sediments.	Relevant and appropriate to MPTC for removal of contaminated soils along the creek if the remedy requires the soils to be removed.

TABLE 8 (Continued)

POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

Standard Requirement, Criteria, or Limitation	Citation	Description	Media	Rationale and Discussion
Location Specific (Continued)				
Archeological and Historic Preservation Act	16 USC § 469	Establishes procedures to provide for preservation of scientific, historical, and archeological data that might be destroyed through alteration of terrain as a result of a Federal construction project or a federally licensed activity of protram. If scientific, historical, or archaeological artifacts are discovered at the site, work in the area of the site affected by such discovery will be halted pending the completion of any dara		May be relevant and appropriate at MPTC during the remedial activities if scientific, historic, or archeological artifacts are identified during implementation of the remedy. recovery and preservation activities required pursuant to the act and its implementing regulations.

Notes:

- ARAR Applicable or relevant and appropriate requirements
- CERCLA Comprehensive Environmental Response, Compensation and Liability Act
- CFR Code of Federal Regulations
- EPA U.S. Environmental Protection Agency
- LDEQ Louisiana Department of Environmental Quality
- LPDES Louisiana Pollutant Discharge Elimination System
- MCL Maximum contaminant level
- MCLG Maximum contaminant level goal
- POTW Publically owned treatment works
- RCRA Resource Conservation and Recovery Act
- USC United States Code

ROD Table 9, source FS Table 11

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
General Conditions					
Site office (8 by 20 feet) (Contractor)	Week	\$500.00	47	\$23,361	Cost based on similar remedial actions completed in Louisiana
Site office (8 by 20 feet) (Oversight) (2)	Week	\$500.00	93	\$46,722	Cost based on similar remedial actions completed in Louisiana
Sample trailer	Month	\$450.00	12	\$5,256	Cost based on similar remedial actions completed in Louisiana
Storage trailer	Month	\$126.20	12	\$1,474	Cost based on similar remedial actions completed in Louisiana
Portable toilets	Month	\$122.80	12	\$2,869	Cost based on similar remedial actions completed in Louisiana
Health and safety and personal protection equipment	Week	\$4,000.00	47	\$186,889	Cost based on similar remedial actions completed in Louisiana
Construction signs/photographs	Lump sum	\$28,437.99	1	\$28,438	Cost based on similar remedial actions completed in Louisiana
Surveying crew	Day	\$790.00	150	\$118,500	Cost based on remedial investigation activities
Site security office	Month	\$231.88	12	\$2,708	Cost based on remedial investigation activities
Uniformed watchman	Hour	\$13.00	7,849	\$102,041	Cost based on remedial investigation activities for 24 hour per day coverage
Telephone connection	Each	\$2,000.00	4	\$8,000	Cost based on remedial investigation activities
Water/sewer service hookup	Each	\$2,500.00	1	\$2,500	Cost based on remedial investigation activities
Site lighting	Each	\$1,795.00	12	\$21,540	Cost based on installation of pole-mounted, high-pressure sodium lamps
Installation of electrical pole/transformer/service connections	Lump sum	\$13,000.00	1	\$13,000	Cost based on similar remedial actions completed in Louisiana

ROD Table 9, source FS Table 11 (Continued)

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Monitor well installation	Linear foot	\$75.00	600	\$45,000	Cost based on remedial investigation activities assuming installation of 12, 50-foot deep, 4-inch diameter stainless-steel wells
Stormwater ditches	Linear foot	\$1.50	2,500	\$3,750	Cost based on similar remedial actions completed in Louisiana
Monitor well plug and abandon	Each	\$1,000	8	\$8,000	Cost based on similar remedial actions completed in Louisiana to remove wells near Consolidation Area
General Conditions Subtotal				\$620,049	
Clear and Grub					
Clear trees to 24-inch diameter	Acre	\$9,925.00	22	\$218,350	Cost based on R.S. Means
Heavy brush and tree clearing (including stumps)	Acre	\$5,700.00	22	\$125,400	Cost based on R.S. Means
Clear and Grub Subtotal				\$343,750	
Nonhazardous Demolition					
Nonhazardous concrete and debris disposal	Cubic yard	\$53.00	2,375	\$125,875	Cost based on R.S. Means
Building demolition	Cubic foot	\$0.24	40,000	\$9,600	Cost based on R.S. Means
Concrete demolition 8-inch (reinforced)	Cubic yard	\$120.90	100	\$12,090	Cost based on R.S. Means
Demolition Subtotal				\$147,565	
Fencing/Gates/Signage					
New fence	Linear foot	\$15.45	2,200	\$33,990	Cost based on remedial investigation activities
Gate	Each	\$800.00	1	\$800	Cost based on remedial investigation activities
Signs	Lump sum	\$3,000.00	1	\$3,000	Cost based on similar remedial actions completed in Louisiana
Fencing/Gates/Signage Subtotal				\$37,790	
Decontamination Facilities					
3/4-inch water line to pad	Linear foot	\$7.50	250	\$1,875	Cost based on R.S. Means

ROD Table 9, source FS Table 11 (Continued)

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Concrete curb, 6 by 6 inches	Linear foot	\$1.80	280	\$504	Cost based on R.S. Means
Area drain with grate 26 by 26 inches and 5-feet deep	Each	\$2,398.25	4	\$9,593	Cost based on R.S. Means
10-inch structural slab on grade	Square foot	\$3.80	4,000	\$15,200	Cost based on R.S. Means
1-inch force main to water treatment	Linear foot	\$5.00	400	\$2,000	Cost based on R.S. Means
1,800 psi pressure washer, 6HP, 4.8 gpm	Each	\$5,500.00	2	\$11,000	Cost based on R.S. Means
Decontamination Facilities (Continued)					
Operation of pressure washer	Hour	\$42.87	3,900	\$167,193	Cost based on R.S. Means
20 gpm sump pump	Each	\$3,848.61	2	\$7,697	Cost based on R.S. Means
Decontamination Facilities Subtotal				\$215,062	
DNAPL Recovery System					
Recovery trench	Square foot	\$15.00	35,000	\$525,000	Cost based on R.S. Means assuming a trench 70 feet deep, 3 feet wide, and 500 feet long
Electrical power poles	Each	\$556.72	16	\$8,907	Cost based on R.S. Means
Electrical overhead power line	Linear foot	\$11.68	800	\$9,345	Cost based on R.S. Means
Electrical 2-inch poly vinyl chloride conduit	Linear foot	\$2.16	2,000	\$4,323	Cost based on R.S. Means
Electrical 3-wire cable	Linear foot	\$4.47	2,000	\$8,938	Cost based on R.S. Means
Electrical distribution/circuit breaker box	Lump sum	\$5,376.00	1	\$5,376	Cost based on R.S. Means
8-inch steel piping	Linear foot	\$16.17	140	\$2,264	Cost based on R.S. Means
Wet well lift station 24 by 60 inches	Each	\$16,906.65	2	\$33,813	Cost based on R.S. Means including pipes to surface
8-inch Schedule 80 stainless steel, well screen	Linear foot	\$140.00	500	\$70,000	Cost based on R.S. Means
Product recovery pump and controls	Each	\$18,550.25	2	\$37,101	Cost based on R.S. Means
Restricted area protection	Each	\$275.00	2	\$550	Cost based on R.S. Means

ROD Table 9, source FS Table 11 (Continued)

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Creosote recovery piping to water treatment facility	Linear foot	\$19.14	500	\$9,570	Cost based on R.S. Means
DNAPL Recovery System				\$715,188	
Water Treatment System					
Treatment building	Square foot	\$39.20	2,000	\$78,400	Cost based on R.S. Means assuming a 50 by 40 by 14 foot high building
Foundation (8-inch slab on grade)	Square foot	\$3.80	2,000	\$7,600	Cost based on R.S. Means
Water Treatment System (Continued)					
Surge tank (100,000 gallons)	Each	\$70,000.00	1	\$70,000	Cost based on R.S. Means
Influent pumps (2)	Each	\$1,800.00	2	\$3,600	Cost based on R.S. Means
500-gallon pump tanks	Each	\$1,500.00	4	\$6,000	Cost based on R.S. Means
Creosote separation/holding tanks	Each	\$9,500.00	2	\$19,000	Cost based on R.S. Means
Packaged 20-gallon per minute oil-water separator	Each	\$17,000.00	1	\$17,000	Cost based on R.S. Means
Intermediate pumps (2)	Each	\$1,200.00	2	\$2,400	Cost based on R.S. Means
Pressure filters (including backwash pumps)	Each	\$13,000.00	2	\$26,000	Cost based on R.S. Means
Granular activated carbon system (2)	Each	\$21,840.00	1	\$21,840	Cost based on R.S. Means
Electrical and lighting	Each	\$11,000.00	1	\$11,000	Cost based on R.S. Means
4-inch carbon steel distribution piping	Linear foot	\$15.07	504	\$7,595	Cost based on R.S. Means
Water Treatment System Subtotal				\$270,435	
Water Treatment Costs (During RA)					
Water Treatment Plant Operations	Month	\$15,000.00	12	\$175,208	Cost based on similar remedial actions completed in Louisiana.
Water testing	Week	\$500.00	47	\$23,361	Cost based on R.S. Means
Water Treatment Costs Subtotal				\$198,596	

ROD Table 9, source FS Table 11 (Continued)

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Contaminated Soil Excavation/Backfill					
Area excavation (including hauling to staging area)	Cubic yard	\$7.61	81,157	\$617,605	Cost based on R.S. Means and similar remedial actions conducted in Louisiana assuming Level C personal protection equipment
Backfill treated material	Cubic yard	\$6.06	81,157	\$491,811	Cost based on R.S. Means and similar remedial actions conducted in Louisiana
Contaminated Soil Excavation/Backfill Subtotal				\$1,109,416	
Contaminated Debris Removal					
Debris removal	Cubic yard	\$13.10	4,875	\$63,882	Cost based on R.S. Means and similar remedial actions conducted in Louisiana
Contaminated Debris Removal Subtotal				\$63,882	
Sediment Excavation/Backfill					
Excavation	Cubic yard	\$8.61	2,176	\$18,735	Cost based on R.S. Means and similar remedial actions conducted in Louisiana
Stream dewatering	Linear foot	\$28.00	1,000	\$28,000	Cost based on R.S. Means and similar remedial actions conducted in Louisiana
Imported backfill and placement	Cubic yard	\$18.00	2,828	\$50,904	Cost based on R.S. Means and similar remedial actions conducted in Louisiana assuming a bulking factor of 1.3 for hauling purposes
Sediment Excavation/Backfill Subtotal				\$97,639	
Soil/Sediment Treatment Costs					
Subgrade cut/fill/compact	Cubic yard	\$9.50	40,000	\$380,000	Cost based on R.S. Means and similar remedial actions conducted in Louisiana, volume includes roads, thermal treatment area, and staging areas
24-inch compacted gravel surface	Cubic yard	\$9.75	--	--	Cost based on R.S. Means and similar remedial actions conducted in Louisiana, volume includes roads, thermal treatment area, and staging areas
Area cover for weather (300 x 100 foot)	Square foot	\$25.00	30,000	\$750,000	Cost based on vendor quote

ROD Table 9, source FS Table 11 (Continued)

**ALTERNATIVE 2
ON-SITE THERMAL DESORPTION**

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Soil/Sediment Treatment Costs (Continued)					
Screening plant	Day	\$450.00	243	\$109,375	Cost based on R.S. Means
Verification sampling	Lump sum	\$1,100,000.00	1	\$1,100,000	Cost based on similar remedial actions completed in Louisiana
Trial burn	Lump sum	\$250,000	1	\$250,000	Cost based on similar remedial actions completed in Louisiana
Soil treatment (1.75 ton per cubic yard)	Ton	\$35.00	142,025	\$4,970,875	Cost based on similar remedial actions completed in Louisiana, including treatment and reconditioning
Hazardous debris transportation, treatment, and disposal	Pound	\$0.42	1,750,000	\$735,000	Cost based on vendor quote for off-site incineration assuming a soil density of 1.75 tons/cubic yard
Nonhazardous debris transportation and disposal	Ton	\$30.00	5,906	\$177,180	Cost based on vendor quote for off-site disposal at Magnolia Landfill (35 miles from site) assuming a debris density of 1.35 tons/cubic yard
Sediment treatment (1.75 ton per cubic yard)	Ton	\$35.00	3,808	\$133,280	Cost based on similar remedial actions completed in Louisiana, including treatment and reconditioning
Soil/Sediment Treatment Costs Subtotal				\$8,743,380	
Cleanup and Landscaping					
Site restoration	Acre	\$2,682.26	20	\$53,645	Cost based on R.S. Means
Final grading	Acre	\$1,000.00	20	\$20,000	Cost based on R.S. Means
Hydro mulch site	Acre	\$1,500.00	20	\$30,000	Cost based on R.S. Means
Replant trees	Acre	\$1,500.00	10	\$15,000	Cost based on similar remedial actions completed in Louisiana assuming 100 trees per acre (10 acres)
6-inch topsoil	Cubic yard	\$22.00	16,133	\$354,933	Cost based on R.S. Means
Cleanup and Landscaping Subtotal				\$473,579	
Subtotal				\$13,036,304	

ROD Table 9, source FS Table 11 (Continued)

ALTERNATIVE 2
ON-SITE THERMAL DESORPTION

Description	Unit	Cost per Unit	Quantity	Subtotal	Comments
Contingency	10 Percent			\$1,303,630	Cost based on R.S. Means
Construction Costs Subtotal				\$14,339,935	
Construction oversight	Lump sum			\$1,600,000	Cost based on similar remedial actions completed in Louisiana
Project Subtotal				\$15,939,935	
Annual water well sampling (4 percent inflation, 7 percent discount)	Lump sum			\$838,208	Cost based on R.S. Means and similar remedial actions conducted in Louisiana
Trench and recovery system O&M (4 percent inflation, 7 percent discount)	Lump sum			\$4,210,194	Quotes for off-site hazardous waste incineration
Engineering design costs	Lump sum			\$1,100,000	Cost based on similar remedial designs completed in Louisiana
Project Total Present Value				\$22,088,337	

Notes:

DNAPL Dense nonaqueous-phase liquid
gpm Gallons per minute
HP Horsepower
N/A Not applicable
O&M Operations and maintenance
RA Remedial action