

in the next NPL update. Public notices and copies of the Responsiveness Summary will be made available to local residents by EPA.

#### IV. Basis for Intended Site Deletion

The following Site summary provides the Agency's rationale for the intended deletion of this Site from the NPL.

The Site is located at the intersection of Sawmill Road and Goldkist Road, approximately two (2) miles west of the City of Live Oak, Suwannee County, Florida. The 51 acre Site is situated in the northwest quarter of Section 22, Township 2 South, Range 13 East. The topography on-site varies in elevation from 85 feet above mean sea level to 111 feet above mean sea level. The area surrounding the Site is considered rural and light agricultural. A sawmill and a construction company are located to the west and east of the Site, respectively. The county airport is also located west of the site. Domestic water in the vicinity of the Site is produced by means of wells into the Floridan Aquifer, the closest private well is approximately 1000 feet downgradient, to the south.

Currently, the Site consists of a land treatment area enclosed by a six foot high chain-link fence topped with barbed wire, a lagoon area to the southwest, and a grassed eastern section. The land treatment area consists of an office, a four-acre clay lined and bermed treatment area which has been seeded with native grasses, and a 750,000 gallon capacity retention pond.

The Site was proposed for the NPL in 1982. Two potentially responsible parties (PRPs), the James Graham Brown Foundation and AMAX Environmental Services, presently the Cyprus AMAX Minerals Company, signed an Administrative Order on Consent (AOC) with EPA in September 1983 to conduct a Remedial Investigation/Feasibility Study (RI/FS). From December 1987 through March 1988, while the RI/FS was underway, AMAX/Brown removed the contents of the sludge lagoon during the winter dry season and dismantled the plant facility. EPA approved of AMAX/Brown's proposed activities and began negotiating a Consent Order while the removal proceeded. The Consent Order was completed in January 1988, and the removal activities were completed in March 1988.

The removal activities consisted of the following: removal of approximately 15,000 tons of creosote sediments/sludge; treatment of 200,000 gallons of lagoon water; and the dismantling, decontamination, and disposal of the entire plant facility. The creosote

sediments/sludge, which came primarily from the lagoon area, were shipped to the hazardous waste landfill in Emelle, Alabama. The removal cleanup criteria for the contaminated soils was 5,000 mg/kg total creosote substances.

Residents near the Site are generally aware that the Site was a wood treating facility sometime in the past and that it is a hazardous waste site. The administrative record was placed in the information repository in Live Oak, Florida on September 29, 1987. A notice regarding the administrative record and a future public meeting was placed in the local newspaper on October 1, 1987. The public comment period began on November 25, 1987 and ended on December 16, 1987. The public meeting on the RI/FS results and the presentation of the selected remedy took place on December 9, 1987 in Live Oak, Florida. The public meeting was attended by very few local citizens. EPA received no comments from the public on the proposed selected remedy or on any other facet of the project. However, reports from the Florida Department of Environmental Protection's (FDEP's) local liaison and from a local newspaper reporter indicated that the community is pleased that EPA, FDEP and AMAX/Brown moved so rapidly to cleanup the Site.

The Record of Decision (ROD), signed on April 18, 1988, determined cleanup at the Site was needed and determined the selected remedy of sludge treatment and land treatment would adequately protect public health, welfare, and the environment.

During the preparation of the Remedial Design/Remedial Action (RD/RA) Work Plan and the filing of the Consent Decree, a fact sheet and a press release were distributed to the public. The RD/RA Work Plan for the land treatment area was approved September 15, 1988.

The Remedial Action (RA) construction of the land treatment area began in October 1988 and the Consent Decree was entered on October 24, 1988. During RA construction, another fact sheet was generated to explain RA progress at the Site.

After the pre-final RA construction inspection on December 14, 1988, another updated fact sheet was generated and distributed to the public announcing the final RA construction inspection to be held on January 19, 1989. Subsequent to the final inspection, a press release was distributed and the appropriate Congressional members were notified of the pending action. The only comments received were from the Florida

Department of Health and Rehabilitative Services and the Suwannee County Coordinator. No local citizens attended the inspection except the Mayor of Live Oak and the Suwannee County Coordinator.

The pre-final RA construction inspection was held on-site on December 14, 1988. The final RA construction inspection meeting was held on-site on January 19, 1989, as required for the approval of the RA Construction Report and subsequent certification of RA construction completion. The RA construction was completed according to the approved design in the RD/RA Work Plan. Upon certification of RA construction completion in April of 1989, Operation and Maintenance (O&M) activities began and continued for five (5) years, as set forth in the ROD and Final Site Closeout Report.

The Final Site Closeout Report was approved by the Regional Administrator of EPA on December 31, 1991. In May 1992, Remediation Technologies, Inc. (RETEC) submitted a Supplemental Risk Assessment for AMAX/Brown to include toxicological information which was not available at the time of the Baseline Risk Assessment. O&M ended with the submittal of the Semi-Annual Status Report in July 1994.

O&M of the source control action involved two (2) years of soil degradation monitoring. A six to eight inch lift of contaminated soil, which had been stockpiled on-site, was added to the land treatment area approximately every three months, until all of the contaminated soil was in the land treatment area. The soils in the land treatment area were monitored and sampled quarterly to determine effectiveness for the remainder of the two (2) year O&M period for soils. At the conclusion of O&M, all soil samples complied with concentrations set forth in the ROD. The O&M for the groundwater began after the certification of RA construction completion in April 1989, and consisted of semi-annual sampling for a period of five (5) years. At the conclusion of O&M, all groundwater samples complied with Federal health-based standards and those set forth in the ROD.

On March 30, 1995, the Five-Year Review Report recommended that the Site be deleted from the NPL since it complies with all deletion requirements.

The results of the five year O&M program show that there are no contaminants of concern existing above health based criteria levels in the soil or groundwater. All aspects of the selected remedy have been implemented and are protective of human health and the