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Community Relations Plan
for
Marshall Wood Preserving

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COMMUNITY RELATIONS PLAN

**Marshall Wood Preserving State Superfund Site
Marshall, Harrison County, Texas**

Updated January 2002

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Table of Contents

Overview of Community Relations Plan	1
Site Profile:	
A. Site Description	1
B. Background and Operating History	2
Community Profile	5
Community Involvement and Concerns	5
Specific Objectives of the Community Relations Program	6
Community Relations Techniques	7
Elected Officials Address List	8
Area News Media	9
Key Project Personnel	10
Program Document Repositories	10

COMMUNITY RELATIONS PLAN

for

Marshall Wood Preserving State Superfund Site

Marshall, Harrison County, Texas

Updated January 2002

Overview of Community Relations Plan

This community relations plan (CRP) identifies issues of community concern regarding the Marshall Wood Preserving State Superfund site (Marshall Wood), located in Marshall, Harrison County, Texas. It also outlines the anticipated community relations activities to be conducted during each phase of the cleanup at the Marshall Wood site.

The Marshall Wood community relations plan has been prepared to aid the Texas Natural Resource Conservation Commission (TNRCC) in developing a community relations program tailored to the needs of the community affected by the Marshall Wood site. The TNRCC will conduct community relations activities to ensure that the local public has input to decisions and access to information about Superfund activities at the Marshall Wood site.

The information in this plan is based on the Hazard Ranking System (HRS) package and the Site-Specific Work Plan for the Remedial Investigation of the Marshall Wood Preserving State Superfund Site, prepared for the TNRCC by Foster Wheeler Environmental Corporation. This plan will be updated periodically during the course of the cleanup.

Site Profile

Latitude/Longitude: 32° 32' 20" N, 94° 23' 30" W

Site Description:

The Marshall Wood Preserving State Superfund Site is located at 2700 West Houston Street in Marshall, Harrison County, Texas. The site is located on four tracts of land and consists of approximately 16 acres of land. The site is bordered by Monarch Tile to the northeast, residential areas to the east and south and a Missouri Pacific Rail line and Ward Street to the west. The southern edge of the Marshall Wood site is bounded by a proposed highway right-of-way.

TNRCC has determined that "industrial use area" is the most likely future land use for the Marshall Wood.

Background and Operating History:

Marshall Wood Preserving operated as a pentachlorophenol (PCP) and creosote wood treating facility from 1949 until its closing in 1980. The facility manufactured pressure treated wood fencing, highway posts, pilings and other products.

Typical wood treatment operations were performed at the facility. Wood materials were placed into treatment cylinders. Steam was pumped into the cylinders to facilitate an initial removal of sap and water from the wood materials. The steam containing sap and creosote or PCP residues was vented to the atmosphere and/or ground surface. A vacuum was placed on the cylinders to open pores of the wood and remove any remaining water and sap from the wood materials. Typically, liquids from the vacuum treatment were condensed and discharged to surface impoundments. Creosote or PCP solution was pumped into the cylinder and the vessel was pressurized. After pressure treatment, the excess creosote or PCP solution was pumped from the cylinder to a storage tank. The treated wood materials were removed from the cylinder and residues were allowed to drip onto the ground. Surface impoundments received blowdown from the pressure vessels, wastewater, unusable creosote and PCP solutions and debris from the cleaning of the vessels.

The Texas Water Commission (TWC), predecessor agency to the TNRCC, performed a "Solid Waste Compliance Monitoring Inspection" of the Marshall Wood Preserving site on April 15, 1987. One soil sample was collected at the site during that inspection. Analytical results revealed the presence of phenols and polyaromatic hydrocarbons (PAHs).

On October 2, 1989, the Texas Department of Highways and Public Transportation (TDHPT), predecessor agency to the Texas Department of Transportation (TxDOT), requested the TWC to perform preliminary testing to determine the extent and areas of contamination at the abandoned Marshall Wood creosote plant site. A proposed right-of-way for the extension of State Highway 154 crossing the southern portion of the property predicated the TDHPT request. In response to the request, TWC staff performed a Fee Bill Inspection of the site on October 11, 1989. TDHPT representatives and the property owners were on-site during the inspection. Two surface impoundments, three vessels containing wastes, visibly stained soils and an area devoid of vegetation were observed at the site. (Aerial photographs, later obtained by the TNRCC, showed at least five surface impoundments were used when the site was active.) One of the surface impoundments appeared to have been filled in with sawdust and debris. Samples collected by TWC from the surface impoundments showed high concentrations of PCP and creosote constituents. Based on these findings, and inability of the owners to finance assessment and remediation of the site, the property was proposed for listing as a State Superfund site at

an October 25, 1990 public meeting in Marshall. A security fence was constructed around the perimeter of the entire site and warning signs installed in October 1992.

On March 19, 1992 TxDOT and TWC agreed to conduct a joint investigation of the portion of the Marshall Wood site proposed for the highway right-of-way. A Focused Environmental Site Investigation was conducted in April and May 1993. This investigation focused only on the proposed highway right-of-way area. Nine soil borings and seven monitor wells were installed. Ground water and selected soil samples were analyzed for volatile organic compounds (VOCs), base-neutral-acid extractable compounds (BNAs), and priority pollutant metals. Results indicated that surface soils along the northern boundary of the right-of-way and along the site road were contaminated with creosote, PCP and metals, primarily lead. Two rounds of ground water sampling, conducted in May 1993 and August 1993, did not reveal any elevated concentrations.

In February 1994 a focused risk assessment of the proposed highway right-of-way was performed. Existing analytical data was evaluated and validated for use in risk assessment. A supplemental field sampling and analysis program was conducted in June 1994 to gather additional data, primarily on dioxins, necessary to complete the risk assessment. The supplemental investigation revealed the presence of dioxins and furans in surface soil in the highway right-of-way and confirmed the presence of a existence of subsurface contamination around one soil boring. This data, along with previous data was used in the focused risk assessment, which considered two potential uses for the proposed right-of-way area, highway construction or industrial use. The risk assessment indicated that risks to site workers and nearby residents were lower under the highway construction scenario. However, carcinogenic risk to highway construction workers was still above the target risk range due to exposure to dioxins/furan in surface soils. Therefore, a limited remedial action was conducted by the TNRCC in late 1994, in which right-of-way surface soils and subsurface soils surrounding the soil boring were removed. TxDOT was subsequently cleared by the TNRCC to proceed with highway construction and the highway right-of-way is no longer included in the study area for upcoming remedial investigation.

In May 1997, results of the Phase I remedial investigation (RI) indicated that additional soil and groundwater investigation was needed. Phase II RI was begun in June 1999, Phase II remedial investigation, which focused on soil and groundwater.

In February 2000, the TNRCC completed the Phase II RI delineation of soil and groundwater contamination.

The TNRCC completed negotiations with the contractor for completion of groundwater investigation and initiation of the feasibility study in January 2001.

In July 2001, the TNRCC approved the final pre-feasibility memo allowing use of

presumptive remedy guidance document for soil and groundwater remediation.

Community Profile

The city of Marshall, county seat of Harrison County, is located in northeast Texas, along U.S. Highway 80, approximately twenty miles west of the Louisiana state line. The State Data Center at Texas A&M University estimated the 2000 population of Marshall at 25,858

The U.S. Census Bureau estimated the 2000 population of Harrison County as 62,110, a 8% increase from the 1990 U.S. Census estimate. The 2000 ethnicity estimates of Harrison County by the U.S. Census was: white, 71.3%; black, 24%, American Indian, 0.3%; Asian, 0.3% and Hispanic, 5.3%

Marshall is one of the older towns in Texas, and has many historic sites dating to and prior to the Civil War. Petroleum, lumber processing and a variety of manufacturing are examples of the town's businesses. East Texas Baptist University, enrollment approximately 1,200, and Wiley College, enrollment about 540, are located in Marshall.

Community Involvement and Concerns

A public meeting, to announce the Texas Water Commission's intention to propose the Marshall Wood site for inclusion on the State Superfund Registry was held October 25, 1990 in Marshall at the County Court at Law Courtroom in the Harrison County Courthouse. A public notice of the proposal-to- registry meeting was published in the September 25, 1990, edition of the *Texas Register* and in the legal notice section of the September 26, 1990, edition of the *Marshall News Messenger*. Records indicate five citizens, in addition to TWC staff, attended.

The primary concern about the Marshall Wood Preserving State Superfund Site stems from the proposed highway right-of-way on the southern boundary of the site. Since October, 1989 the Texas Department of Transportation (TxDOT), and its predecessor agency the Texas Department of Highways and Public Transportation, has collaborated on initial site investigation of that portion of the site containing the proposed highway right-of-way.

There has been minimal, if any, inquiries about the site from the general public.

Specific Objectives of the Community Relations Program

- A. Maintain open communications between the Texas Natural Resource Conservation Commission, Harrison County, City of Marshall, State elected officials and concerned citizens.
- B. Continue to expand the mailing list to include additional agencies, organizations, and residents that are interested in the project.
- C. Provide a central information contact from whom interested parties can receive information on site activities, project status, and study results.
- D. Provide citizens, involved agencies, elected officials, and the media with accurate, timely information concerning the scope, progress, and findings of site-related activities by issuing press releases and conducting community meetings.
- E. Brief field teams on community relations issues before performing on-site investigations.
- F. Provide all information, especially technical findings, in a language that is understandable to the general public and in a form useful to interested citizens and elected officials through the preparation of fact sheets and news releases, when major findings become available during project phases.
- G. Monitor community concerns and information requirements as the project progresses by monitoring the community response to news releases and community meetings.
- H. Modify the community relations plan as changes in community attitudes and needs occur and maintain accuracy during different project phases.

Community Relations Techniques

- A. Project Mailing List - To provide the means through which press releases, project status reports and other significant communications can be distributed to concerned groups and individuals.
- B. Public Consultations - Conduct informal meetings (if needed) with residents. To provide an opportunity for affected residents to express any concerns and to make inquiries to insure effective two-way communication.
- C. Program Document Repositories - To maintain easily accessible repositories through which the public may review project outputs. The public will be periodically informed of the availability of project documents and the location of repositories via techniques A through D.
- D. State Superfund Quarterly Status Reports - Direct mail to state, local and county officials and interested persons.
- E. Revise CRP - To reflect changes in site activities or local concerns. After the Proposed Remedial Action Document (PRAD) has been issued, the CRP will be revised to address implementation of the selected remedial action alternative.

Area Elected Officials Address List

State

The Honorable Bill Ratliff
Texas Senate
PO Box 12068
Austin, Texas 78711
512/463-0101

The Honorable Bill Ratliff
P.O. Box 1218
Mt. Pleasant, TX 75456
Phone - 903/572-1887

The Honorable Paul Sadler
Texas House of Representatives
PO Box 2910
Austin, Texas 78768
512/463-0626

The Honorable Paul Sadler
PO Box 1220
Henderson, Texas 75653
903/657-1433

City

The Honorable Ed Smith
Mayor
City of Marshall
PO Box 698
Marshall, Texas 75670
903/935-4421

The Honorable John Wilborn
City Commissioner, Dist. 5
City of Marshall
Marshall, Texas 75670
903/935-4421

Area News Media

Marshall News Messenger

ATTN: City Editor

PO Box 730

Marshall, Texas 75671

Phone: 903/935-7914

Fax: 903/935-6242

KCUL-AM/FM

ATTN: News Director

PO Box AA

Marshall, Texas 75671

Phone: 903/935-1410

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KEY PROJECT PERSONNEL

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PROGRAM DOCUMENT REPOSITORIES

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Building E, North Entrance, First Floor
Austin, TX 78753
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300 South Alamo
Marshall, Texas 75670
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