# UNITED STATES FORGECRAFT

## STATE PRIORITY LIST SITE FORT SMITH, ARKANSAS



ADEQ 5301 Northshore Drive North Little Rock, Arkansas 72118



EPA RCRA ID No: ARD006341747 EPA CERCLA ID No: ARD006341747 AFIN: 66-00145 County: Sebastian Arkansas Senate District: 13 Arkansas House District: 12 US Congressional District: 3

#### **Current Status**

An Emergency Removal Action was accomplished in March of 2004 at the U.S. Forgecraft facility, an abandoned electroplating facility. Conditions at the site were stabilized during this operation and hazardous substances, including caustics and metal-contaminated plating solutions, were removed and disposed of offsite. Additional cleanup occurred in April and May of 2006 to siphon liquids from remaining drums, remove several barrels and small containers, repair the property's perimeter fencing, and post warning signs to deter trespassers. An ADEQ site visit in July 2007 noted that approximately 1100 empty 55-gallon drums were stored in the facility's main building. Additionally, wastewater treatment tanks containing approximately 50 cubic yards of wastewater treatment sludge and a sump holding liquid remained onsite. The EPA Region 6 Response and Prevention Branch was designated as the lead authority for the site.

A fire occurred at the site in April 2008, destroying the office building and damaging the water treatment plant facility. Results of the EPA sampling following the fire indicated that no contaminant releases occurred. The EPA has completed the final cleanup operations, which included offsite disposal of all remaining wastes, and conducting archaeological and cultural resources surveys prior to building demolition.

In July of 2010 Land Legacy, a non-profit organization, entered the former Forgecraft property into the Arkansas Voluntary Clean-Up Act (Brownfields Program) (Act 1042 of 1997, as amended, Arkansas Code Annotated (A.C.A. 8-7-1101 et seq.). Land Legacy intends to acquire title to the property and then transfer the property to the Department of Interior's National Park Service.

The Department of Interior's National Park Service, which runs the Fort Smith National Historic Site adjacent to the former Forgecraft facility, intends to use the site as an expansion of the Historic Site's Belle Point riverfront park.

## State Priority List History

The Arkansas Remedial Action Trust Fund Act (A.C.A. 778-7-501 et seq.), or RATFA, provides authority and funding for identifying, investigating, and remediating hazardous substance sites throughout the State. The RATFA Hazardous Substances State Priority List (SPL) identifies those hazardous substance sites eligible for State-funded investigation and remedial actions, if necessary, on a case-by-case basis; it is not an inclusive site inventory or historical list.

ADEQ representatives conducted a site visit in March 2004 and discovered a significant volume of hazardous substances stored in and around the buildings. Visible evidence of contaminants leaving the facility was also noted, and the site was accessible through various points around the perimeter fence. The conditions posed an obvious threat of an imminent release of hazardous substances into the environment and required immediate containerization, stabilization, and removal.

Emergency rulemaking was initiated in July 2004 to add the U.S. Forgecraft metal finishing and electroplating facility to the RATFA SPL. Upon completion of all cleanup and site restoration activities, the site was removed from the RATFA SPL in June 2010.

## Site Description

Location:	The 2.86-acre site is located at Belle Point on the bank of the Poteau River, adjacent to the National Parks Service in Fort Smith, Arkansas. The geographical coordinates are $35^{\circ} 23^{\circ}$ 8.9" north latitude, $94^{\circ} 25^{\circ} 52.3^{\circ}$ west longitude; the street address is 95 South $3^{rd}$ Street.
Population:	Fort Smith has approximately 80,268 residents.
Setting:	The property is located in an area used for commercial, industrial, and tourism purposes. The Fort Smith National Historic Site abuts the northern property line; the Fort Smith Trolley Museum and the Fort Smith National Cemetery define the eastern boundary, while the south is marked by undeveloped land. The Poteau River borders the property to the west.
Hydrology:	Surface water from the site flows in an east to west direction into the Poteau River. The Poteau River enters the Arkansas River approximately <sup>1</sup> / <sub>4</sub> mile from the site. There are no surface water pathways or impoundments on the property, and no drinking water wells or Wellhead Protected Areas are located within a 4-mile radius of the site.

Aerial Photo: Former US Forgecraft Property - Forth Smith, Arkansas



### Waste and Volumes

Plating operations and wastewater treatment at U.S. Forgecraft generated the following wastes and waste constituents: corrosives, acids, arsenic, barium, cadmium, chromium, lead, mercury, silver, zinc, aluminum, and cyanide. The EPA contractors initially inventoried and/or staged 476 drums/containers, 9 wastewater treatment tanks, 18 plating vats, and one sump.

From June 2008 through March 2009, the following waste was removed from the site:

- 1,592 tons of hazardous soil
- 1,145 tons of hazardous slag
- 254 tons of hazardous bricks and concrete debris
- 12,500 gallons of hazardous liquids
- 24 tons of hazardous sludge
- 866 tons of non-hazardous soil
- 3,025 tons of non-hazardous concrete, asphalt, and vegetative debris
- 2.5 tons of cut poly drums (non-DOT/non-RCRA waste)
- 100 gallons of hazardous decontamination water from the poly drums
- 600 pounds of hazardous absorbent materials from the decontamination of the poly drums
- 20 pounds of mercury switches from process machinery
- 100 pounds of lead/chromium/cadmium electrodes
- 720 fluorescent light bulbs and fluorescent light power ballasts
- 93 tons of hazardous soil
- 200 pounds of hazardous waste oil
- 1,000-gallon (empty) underground storage tank
- 106 tons of non-hazardous soil
- 2,825 gallons of oil and oily water

During removal operations, the contractors conducted air monitoring inside waste storage areas and around the perimeter of the site. No detectable releases of cyanide gas or volatile organic compounds were recorded.

#### Health Considerations

The ADEQ prepared a risk evaluation of the 2004 Site Inspection (SI) Task Workplan and Analytical Results under the residential use standard. This risk evaluation indicated the following chemicals exceeded risk-based human health screening criteria and/or groundwater protection standards in surface soil, subsurface soil, and/or sediment samples: antimony, arsenic, benzo(b)fluoranthene, benzo(a)pyrene, cadmium, chromium, cyanide, dibenzo[ah]anthracene, indeno[1,2,3-cd]pyrene, iron, lead, nickel, and thallium.

The EPA Region 6 identified the following contaminants of concern (COCs) for the U.S. Forgecraft site: arsenic, lead, cadmium, total chromium, and polycyclic aromatic hydrocarbons. The rationale for the contaminant-associated proposed action levels (PALs) was their historic use at various sites and the potential exposures during future recreational use of the property. In response to an EPA Region 6 request, the Arkansas Department of Health evaluated the EPA's PALs to be used for remedial cleanup

concentrations of these COCs. A Health Consultation Report issued in November 2006 determined that these PALs are considered to be protective of human health providing the property is used for recreational purposes.

## ADEQ Response Actions

The following provides a chronology and brief description of actions taken at the U.S Forgecraft site:

- Site Visit, March 2004 Reconnaissance and sampling location determination in preparation for a SI Report. Plating waste, wastewater treatment waste and sludge, and various hazardous chemicals and waste left onsite when the business closed were noted.
- Emergency Order, March 2004 ADEQ Emergency Order LIS 04-043 issued.
- Site Stabilization, April 2004 Categorized, segregated, and staged waste in 55-gallon drums.
- Waste Characterization, May 2004 Sampling to identify and characterize waste types to determine proper disposal; metals and cyanides found to be of concern.
- Site Inspection Implementation, June 2004 Soil and sediment samples collected.
- Final Site Inspection Report, October 2004 Based on metals and cyanide contamination findings, further investigation and expanded sampling recommended.
- Request for Assistance, October 2004 Due to removal costs exceeding the budget, request for assistance sent to EPA Response and Prevention Branch.
- Removal and Assessment, May and June 2005 Removal and assessment operations conducted by EPA Region 6
- Site Visit, March 2006 Meeting at site with ADEQ representatives, EPA Region 6 On-Scene, and contractors to assess results of previous removal actions, determine remaining requirements, and address property security concerns.
- Site Visit, July 2007 Reconnaissance to determine current site conditions.
- Appreciation Ceremony, March 2009 ADEQ representatives attended an appreciation ceremony held by the EPA to recognize local, state, and national organizations who contributed toward the completion of the cleanup at the site.
- Site Visit, September 2009 Reconnaissance to view site restoration.
- Final Document Review, May 2010 Review of EPA Removal Report, Arkansas Department of Health Consultation Report, and other cleanup-related documentation.

# **ADEQ Anticipated Future Activities**

The Arkansas Department of Health Consultation Report assigned the US Forgecraft site to the category of No Apparent Public Health Hazard, which is applied to sites where exposure to site-related chemicals might have occurred in the past or is still occurring, but the exposures are not at levels likely to cause adverse health effects. The EPA removed all remaining physical and chemical hazards from the site, disposed of hazardous and non-hazardous materials at approved disposal facilities, and conducted site restoration. The US Forgecraft site no longer presents a threat to either human health or the environment. The site was removed from the RATFA SPL in June 2010.

Land Legacy, a non-profit conservation organization, is working in partnership with the National Park Service and the ADEQ Brownfields Program to acquire the site. Upon completion of the Brownfields process, the Land Legacy will deed the property to the National Park Service as an addition to the Fort Smith National Historic Site.

#### **Site Contacts**

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