

EMERGENCY CONTINGENCY PLAN
OPOSSUM CREEK DRUM SITE
MORaine, MONTGOMERY COUNTY, OHIO

March 21, 2013

The Opossum Creek Drum Site is located at 4101 Soldiers Home West Carrollton Road in Moraine, Montgomery County, Ohio (see Attachment 1). The Site is located in a mixed residential and commercial area, and is bordered to the north by a former dump; to the west and south by Opossum Creek, with residential and wooded areas beyond; and to the east by commercial and residential areas, with wooded areas beyond (see Attachment 2). Commercial businesses are located within 500 feet east of the Site, and the closest residences are located within 300 feet west of the Site.

The Site encompasses an area of approximately 28,100 square feet. Hundreds of visible drums and containers are partially buried on Site. Some partially buried drums and containers have been observed next to and within Opossum Creek, which eventually discharges into the Great Miami River. In addition to the partially buried drums and containers on site, there are thousands of abandoned tires (see Attachment 3).

SITE HISTORY

Historic records indicate that the Site is a former dump that at some point began receiving and burying 55-gallon drums and containers in an area next to Opossum Creek.

On November 2, 2012, Public Health – Dayton Montgomery County (PHDMC) issued a Notice of Violation letter to the owner of the property. The letter summarized the findings of an inspection conducted at the property on October 25, 2012, by PHDMC, the Ohio Environmental Protection Agency (OEPA), Montgomery County Sheriff (MCS), Liberty Tires, and Rumpke. The October 25, 2012, inspection was a follow-up to a previous inspection conducted on June 22, 2012. The purpose of the investigation was to determine if the property still was in violation of Ohio's Solid Waste Regulations. The October inspection documented thousands of scrap tires dumped on the ground and burnt scrap tires and miscellaneous solid waste scattered throughout the property. The inspection also documented numerous barrels containing various colored substances believed to be ink or paint.

In an MCS incident report dated October 25, 2012, an MCS representative inspected the property and documented the conditions summarized below.

- Approximately 80,000 scrap tires were observed at various locations throughout the property.
- Approximately 100 metal drums containing dye, ink, or paint from a printing company were observed.
- All of the metal drums displayed signs of corrosion.
- The colored substance, believed to be paint, was visible on the ground and in Opossum Creek at multiple locations.
- Several burn piles were observed throughout the property. In these areas, scrap tires had been burned and their rims removed. OEPA determined that burning had been conducted recently in these areas.

- Trespassing was occurring at the Site.

In late November 2012, representatives from the OEPA, PHDMC, and MCS conducted a site inspection of the Site. Hundreds of partially buried and disintegrating drums and containers containing dried ink waste were observed on the property. Multi-colored ink waste was observed mixed with on-site soil and within the abandoned and partially buried drums and containers. Some ink waste material was observed in direct contact with Opossum Creek. OEPA personnel used an XRF meter to conduct field screening of the multi-colored ink waste for heavy metals. XRF readings indicated lead and arsenic at concentrations as high as 173,200 and 11,700 parts per million (ppm), respectively.

In a document dated December 3, 2012, the OEPA formally requested assistance from EPA to determine if the Site meets the criteria for a removal action.

On December 7 and 12, 2012, EPA conducted a site assessment to document Site conditions and evaluate the Site for a potential time-critical removal action. During the site assessment, EPA observed hundreds of partially buried 55-gallon drums and about 50 5-gallon containers. EPA collected 1 sludge/liquid waste sample and 10 solid waste samples from drums and surficial soil at the Site. Analytical results document the on-site presence of hazardous waste characteristic for ignitability (D001), arsenic and lead analytical results exceeding EPA's residential Removal Management Levels (RML), and toxic (D008) hazardous waste. In addition, EPA and OEPA XRF readings documented widespread heavy metal (lead and arsenic) contamination in surficial soil throughout the Site at concentrations exceeding EPA's residential lead and arsenic RMLs.

U.S. EPA plans to initiate a removal action at the Site in April 2013. U.S. EPA plans to undertake the following actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Characterize, remove, transport and dispose of all characterized or identified hazardous waste (uncontainerized waste, partially buried and subsurface drums and small containers) and associated heavy metals-contaminated soils and debris located at the Site in accordance with EPA's Off-Site Rule (40 CFR § 300.440);
4. Develop and implement an extent of contamination and post excavation sampling plan to verify cleanup;
5. If necessary, backfill excavated areas with clean material and topsoil. Seed area to prevent soil erosion; and
6. In coordination with the Site owner and Ohio EPA, remove and properly dispose of all abandoned tires on site.

HOURS OF OPERATION

When the removal begins, EPA crews will be on Site Monday through Thursday (0700 to 1730 hours). A security guard will be on Site during non-working hours and stationed in an office trailer. A copy of the Emergency Contingency Plan will be available on Site, if needed.

ADDITIONAL INFORMATION

U.S. EPA has posted the following website for further information:

<http://www.epaosc.org/opossumcreekdrumsite>

In the event of a required response by local emergency authorities during site removal activities, the following protocols provide necessary guidance for the following potential response events:

Vandalism/Trespass;

Medical Emergencies; and

Fire/Explosion

VANDALISM/TRESPASS

In the event of vandalism/trespass at the Site, the Moraine Police Department (MPD) will respond to the EPA Command Post office trailer. Attempts will be made by the law enforcement to apprehend the offenders on the Site property up to the drum burial area (ie, work zone/excavation area), which will be delineated with caution tape. If the offenders are within the drum burial area, communication via loudspeaker will be conducted prior to apprehending the offenders following their exit from the work zone. Members of the MPD should wear gloves or immediately wash their hands following apprehension of the offenders. The MPD and/or the on-site security guard will immediately advise EPA OSC Steve Renninger of any incidents of trespass or vandalism.

MEDICAL EMERGENCIES

Rescue operations on the Site property, if necessary, should be conducted by personnel wearing Level D personal protective equipment with disposable latex booties. The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum emergency decontamination should be completed. If possible, decontamination and removal of injured personnel from the exclusion zone will be conducted prior to arrival of emergency medical services (EMS). EMS will pick up injured personnel at the EPA Command Post office trailer.

For emergencies requiring transport to a hospital, **911** will be called. The caller will identify that the emergency is located in Moraine, Ohio. The victim should be transported to Kettering Medical Center, located at 3535 Southern Boulevard, Kettering, Ohio, **(937) 298-4331** (7.4 miles). A map showing directions to the hospital from the site is included as Attachment 4.

FIRE/EXPLOSION

To activate fire department resources, the Moraine Fire Department dispatcher will be notified by calling **911**. The caller will identify that the site is located in Moraine, Ohio. In addition, EPA OSC Steve Renninger will be contacted on his cell phone at (513) 260-7849.

During a hazardous materials incident, law enforcement will control perimeter access; however, they are not equipped with protective clothing and their main function will be site control and preventing unauthorized persons from entering the hazard area. Law enforcement should not enter the exclusion zone (i.e. the excavation/drum burial area).

Prior to work activities, EPA will create fire breaks in the tire piles and will stage soil to assist in smothering any tire fire that occurs. In addition, EPA will preposition boom in at least two locations in the event there is oil runoff into Opossum Creek from a tire fire.

The fire department when called out to the scene of a hazardous materials emergency has the duty and responsibility to save lives, prevent injuries, reduce property loss, and to restore vital services. Command of the emergency will be established by the officer of the first arriving fire company. The command will be transferred utilizing fire department staff, under the Incident Command System. The Fire Chief will be in charge of the incident until such time that he relinquishes that authority.

Telephone numbers of personnel who should be contacted in the event of an incident are listed on the attached page. At a minimum, the following personnel will be notified;

U.S. EPA On-Scene Coordinator	Steve Renninger
Moraine Fire Department	Moraine Fire Chief Tony Trick
Dayton Regional Hazmat	Denny Bristow

In the event of heavy smoke or toxic gas emission, the fire department may initiate “shelter-in-place” of the neighboring areas. If this is necessary, it should proceed according to Montgomery County EMA Guidelines. EPA’s START contractor will also be available to assist with perimeter air monitoring. Air monitoring will consist of:

- 1) AreaRAEs (VOCs, carbon monoxide, hydrogen sulfide)
- 2) DateRAMs (particulates)
- 3) Assortment of Drager tubes (such as benzene and sulfur dioxide)
- 4) Air sampling (using SUMMA canisters or air sampling pumps)

**LIST OF CONTACTS
OPOSSUM CREEK DRUM SITE
MORaine, MONTGOMERY COUNTY, OHIO**

<u>LOCAL AGENCY</u>	<u>PHONE#</u>	<u>CONTACT</u>
Moraine Fire Department	911 (request Moraine Area) 937-689-0529 cell 937-313-9858 cell 937-535-1166	Emergency Dispatcher Chief Tony Trick Deputy Chief Dave Cooper Non-Emergency
Moraine Police Department	911 (request Moraine Area)	Emergency Dispatcher
Dayton Regional Hazardous Materials Response Team	937-512-5103 office 937-901-5112 cell	Denny Bristow
Montgomery County EMA	937-224-8936	Jeffery Jordan
Montgomery/Greene County LEPC	937-531-6548	Mathew Lindsay
Kettering Medical Center	937-298-4331	

FEDERAL/STATE

EPA On-Scene Coordinator National Spill Response Center	(513) 260-7849 cell (800) 424-8802	Steve Renninger 24-hour Spill Reporting
Ohio EPA Environmental Response	(800) 282-9378	24-hour Spill Reporting
Ohio EPA Emergency Response	(937) 478-9177	Dale Farmer - OSC
Ohio EPA (Division of Hazardous Waste Management)	(937) 285-6070	Jeff Smith
EPA Region 5 Response (Emergency only)	(312) 353-2318	(24-hour # that rings in Chicago or Detroit and can assist or locate the OSC)
Ohio EPA (Tire Contact)	(937) 285-6045	Tracy Buchanan

COMMAND POST PHONE NUMBERS

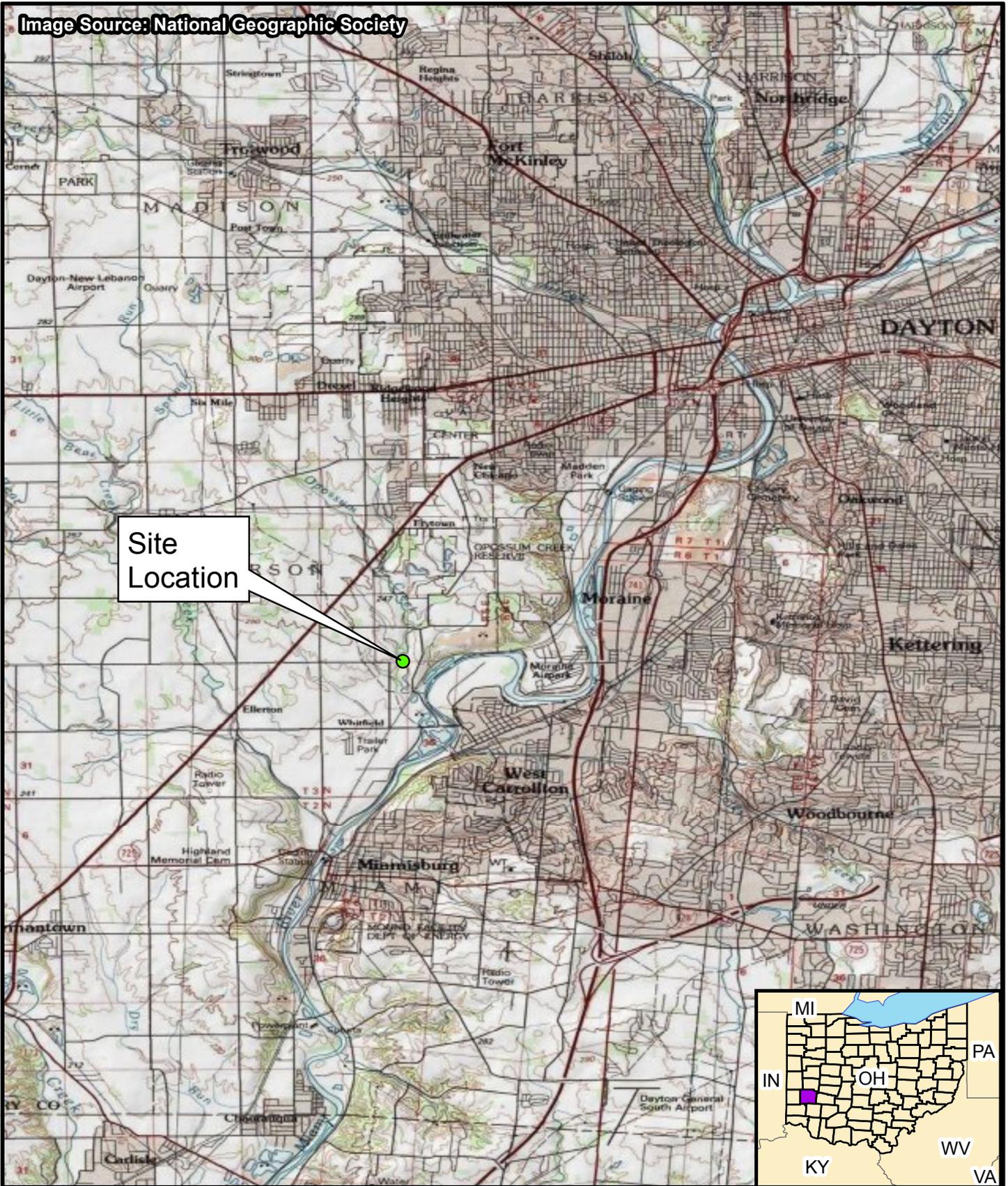
Weston START	(513) 703-3092 cell (937) 313-5620 cell	John Sherrard Weston Emer. Resp. Phone
Environmental Quality Management (ERRS)	(513) 543-3909 cell (513) 314-3503 cell	Steve Letany – Resp. Mgr Tyrone Price – Cost Acct.

PROPERTY OWNER

Gwen Gilboy	(937) 542-0008	Gwendolyn.Gilboy@yahoo.com
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ATTACHMENT 1
SITE LOCATION MAP

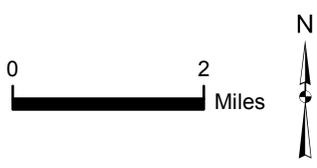
Image Source: National Geographic Society



Site Location



Path: C:\START Project Files\Opposum Creek Drum Site\GIS\mxd\Figure 2-1 Site Location Map.mxd, 1/31/2013 1:17:59 PM, kirklanr



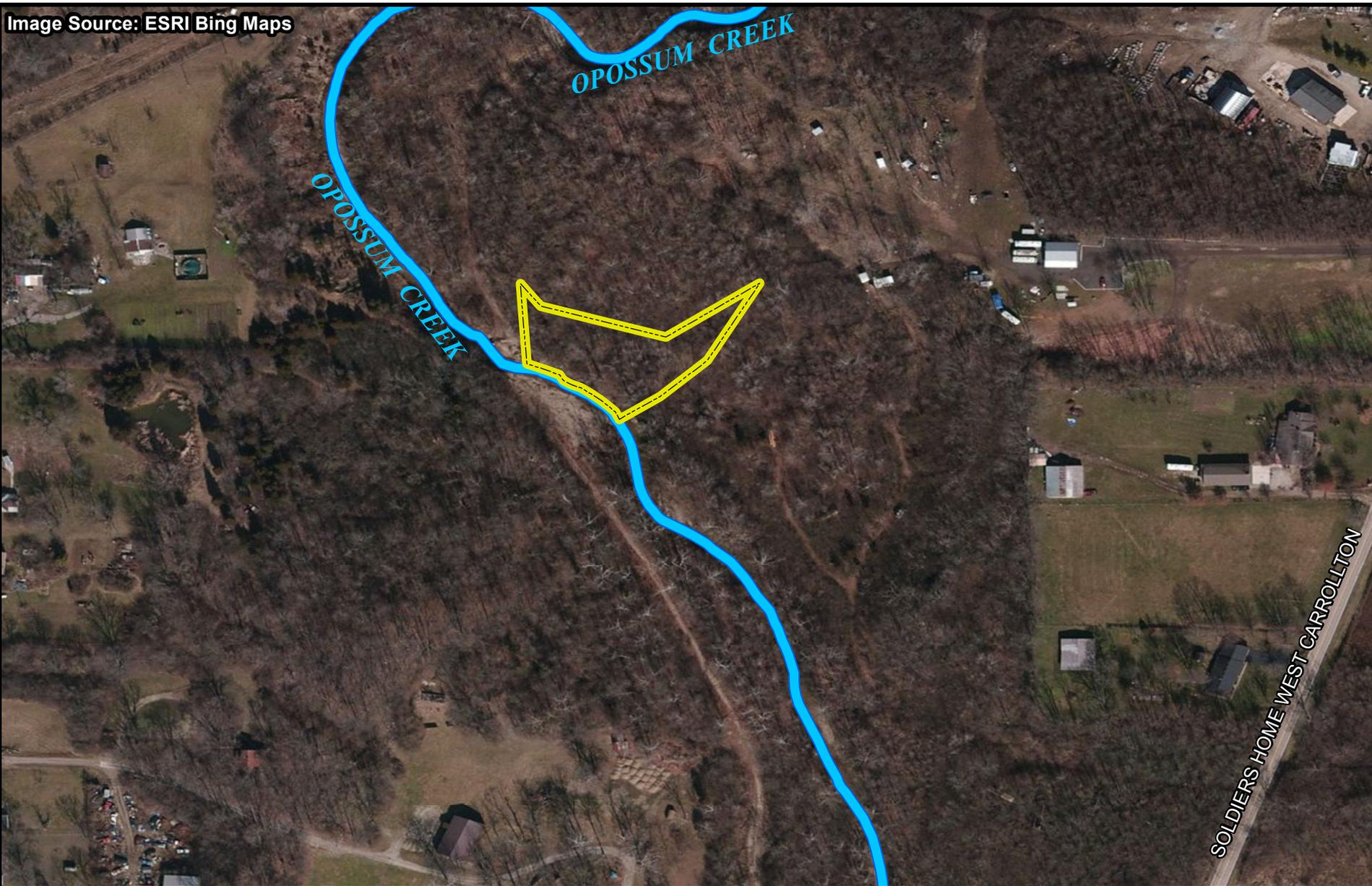
 Prepared For:
U.S. EPA REGION V
 Contract No: EP-S5-06-04
 TDD No.: S05-0001-1211-013
 DCN: 2050-2A-BFPT

 Prepared By:
WESTON SOLUTIONS, INC.
 4710-A Interstate Drive
 Cincinnati, Ohio 45246

Figure 2-1
 Site Location Map
 Opposum Creek Drum Site
 Moraine, Montgomery County, Ohio

ATTACHMENT 2
SITE LAYOUT MAP

Image Source: ESRI Bing Maps



- Legend**
-  Drum Burial Area
 -  Opossum Creek



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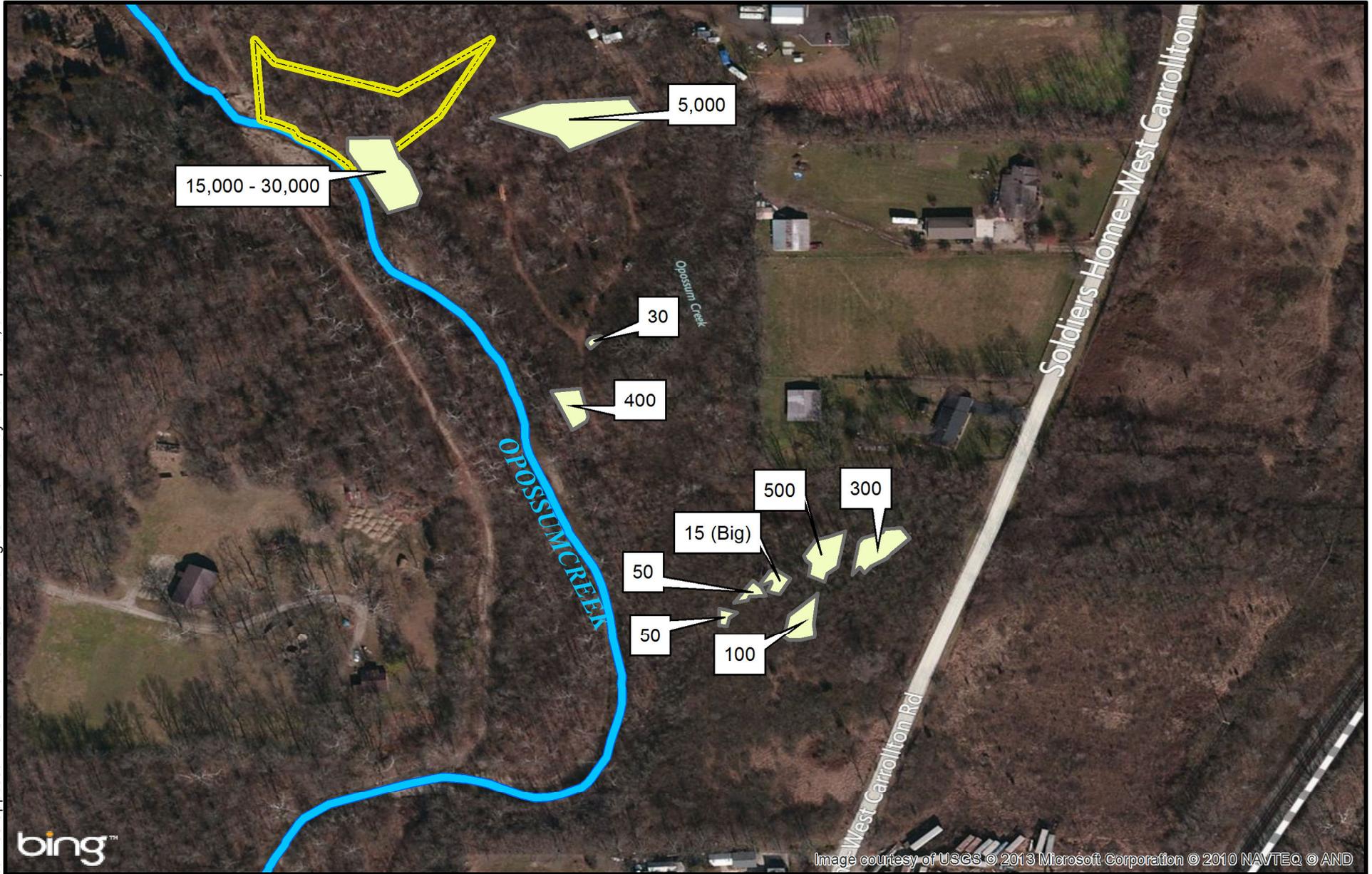


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4710-A Interstate Drive
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Figure 2-2
Site Layout Map
Opossum Creek Drum Site
Moraine, Montgomery County, Ohio

ATTACHMENT 3
TIRE LOCATION MAP



Legend

-  Significant Tire Pile
-  Grid Location
-  Drum Burial Area
-  Opossum Creek



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U.S. EPA REGION V

Contract No: EP-S5-06-04
TDD No.: S05-0001-1211-013
DCN: 2106-4D-XXXX



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4710-A Interstate Drive
Cincinnati, Ohio 45246

Figure 4
Tire Pile Layout Map
Opossum Creek Drum Site
Moraine, Montgomery County, Ohio

ATTACHMENT 4
HOSPITAL ROUTE MAP

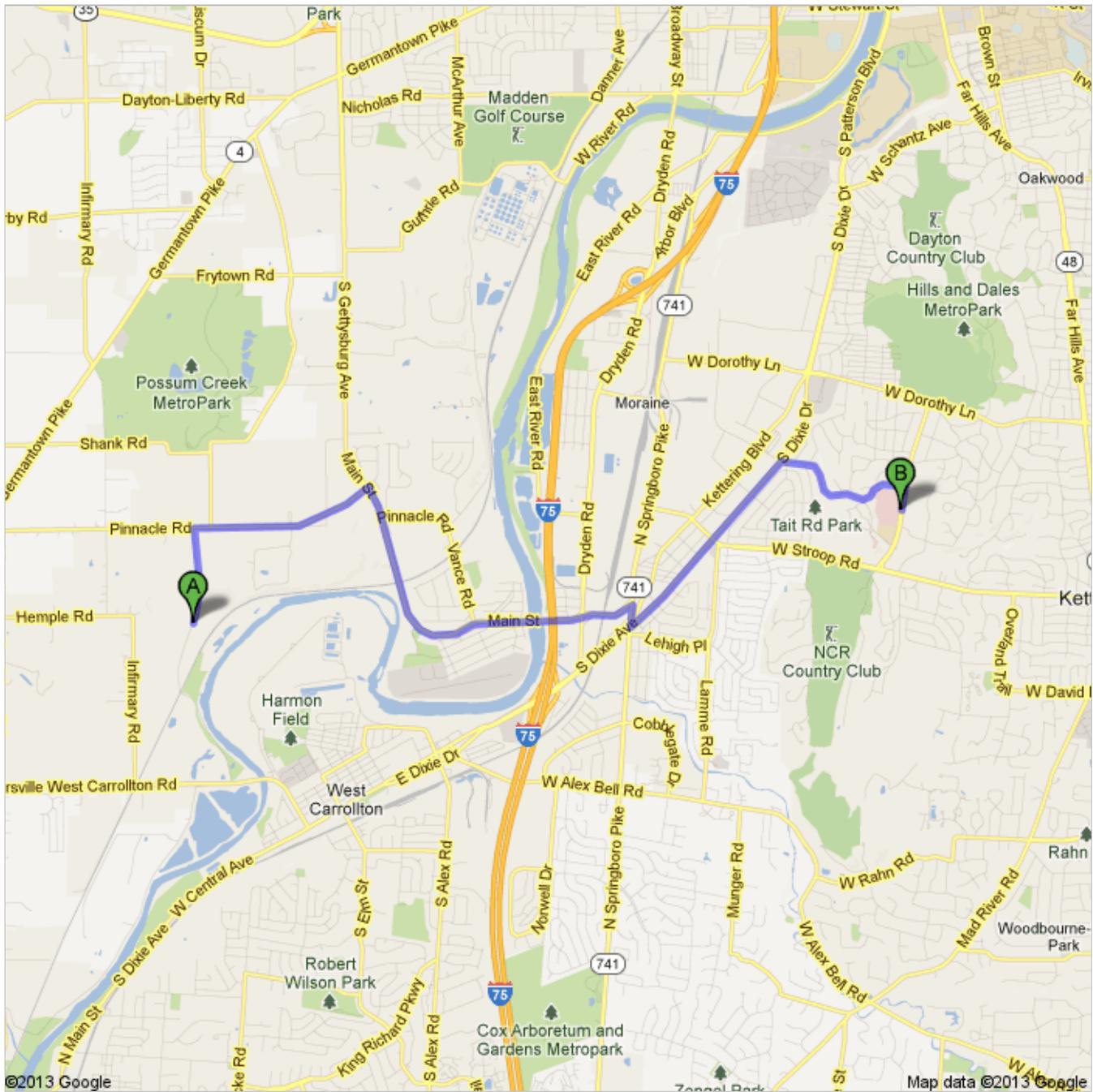


Directions to 3535 Southern Blvd, Kettering, OH 45429

6.3 mi – about 16 mins

HOSPITAL ROUTE MAP

OPOSSUM CREEK DRUM SITE





4101 Soldiers Home West Carrollton Rd, Moraine, OH 45418

1. Head **north** on **Soldiers Home West Carrollton Rd** toward **Pinnacle Rd**
About 1 min go 0.6 mi
total 0.6 mi
2. Turn right onto **Pinnacle Rd**
About 2 mins go 1.1 mi
total 1.7 mi
3. Turn right onto **Main St**
About 5 mins go 2.2 mi
total 3.9 mi
4. Turn right onto **N Springboro Pike**
go 0.1 mi
total 4.0 mi
5. Turn left onto **S Dixie Dr**
About 4 mins go 1.3 mi
total 5.3 mi
6. Turn right onto **Big Hill Rd**
About 2 mins go 0.9 mi
total 6.2 mi
7. Turn right onto **Southern Blvd**
Destination will be on the right
About 45 secs go 0.1 mi
total 6.3 mi



3535 Southern Blvd, Kettering, OH 45429

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2013 Google

Directions weren't right? Please find your route on maps.google.com and click "Report a problem" at the bottom left.