

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
C6-Zero - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VII

**Subject:** POLREP #3  
POLREP#3  
C6-Zero  
IAN000740985  
Marengo, IA  
Latitude: 41.7951537 Longitude: -92.0580976

**To:** Eric Nold, EPA  
Joe Krauska, SEMD  
Todd Davis, SEMD  
Yvonne Smith, EPA

**From:** Yvonne M. Smith, OSC

**Date:** 10/10/2023

**Reporting Period:** 9/30/2023-10/10/2023

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	IAN000740985	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	7/24/2023
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	5/17/2023	<b>Start Date:</b>	5/17/2023
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	B707	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Potentially Responsible Party Time-Critical Removal Action under an Administrative Settlement Agreement and Order on Consent For Removal Action (ASAOC) with direct EPA oversight.

#### 1.1.2 Site Description

See Polrep #1.

##### 1.1.2.1 Location

See Polrep #1.

##### 1.1.2.2 Description of Threat

See Polrep #1.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Polrep #1.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The PRP has been directed under order to dispose of all waste generated as the result of the fire and explosion. Once all the waste that was generated from the December 8, 2022 event is properly disposed, an additional removal assessment will be conducted to determine whether additional actions are warranted.

#### 2.1.2 Response Actions to Date

The following describes the current activities that have occurred during this reporting period:

##### October 2 - October 5, 2023

A disposal work plan was provided by Eco Source and approved by the EPA for the disposal of 2 piles of non-hazardous contaminated soil excavated from the dry ditch area located on the east side of the facility.

Eco Source, the PRP contractor, oversaw the disposal of 3,150 tons of excavated non-hazardous contaminated soils to the Iowa County Landfill. Hauling, completed on October 5th, was subcontracted to J Pettiecord and Kinzenbaw Earth Moving. No additional excavated soils remain on site.

October 4- October 6, 2023

Eco Source also oversaw Enviromark (subcontractor) conduct decontamination operations inside the warehouse, where the 250 totes of liquid waste were stored, and additional impacted floor surfaces. 21,000 gallons of rinse water were collected and transported to Harper, KS for disposal at Plum Thicket Landfill. These operations were completed on October 6.

Staged solidified material and crushed tote waste, emptied during the solidification process, remain staged east of the loading dock. Eco Source is awaiting lab results to determine the receiving disposal facility.

The EPA coordinated with the Iowa County Emergency Manager to spot check disposal operations. No issues were raised by the local or county responders.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

An ASAOC between the EPA and C6-Zero was signed on July 27, 2023. EPA ECAD and EPA CID are conducting their own investigations concurrent with this order/removal action. The state of Iowa has placed a Stay on their Order until further notice pending completion of this action.

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
non-hazardous liquids	liquids	~110,000 gallons			approximately 99,886 gallons as of 9/29/2023
non-hazardous solids	solids/soils	4,000 cubic yards			3150 Tons
non-hazardous rinse water (decon)	liquids	21,000 gallons			approximately 21,000 gallons as of 10/6/2023

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

Disposal of solidification soils and tote waste are anticipated to start the week of October 9, 2023.

**2.2.1.1 Planned Response Activities**

Disposal of non-hazardous soil piles were initiated and completed during this reporting period.

**2.2.1.2 Next Steps**

Continue appropriate government oversight of PRP removal activities now that activities have switched from liquid waste disposal to solids disposal.

**2.2.2 Issues**

None during this reporting period.

**2.3 Logistics Section**

All current logistical issues have been turned back over from the PRP to the PRP's environmental contractor, Eco Source, who was named as the Project Manager in the ASAOC.

**2.4 Finance Section**

**2.4.1 Narrative**

This is a PRP-lead action with EPA cost recovery to occur at a later date.

**2.5 Other Command Staff**

**2.5.1 Safety Officer**

The EPA is participating in daily tailgate safety briefings each day that site activities are occurring.

**2.5.2 Liaison Officer**

The EPA OSC has maintained coordination with state, county, and local officials.

**2.5.3 Information Officer**

An EPA PIO has maintained site awareness and continues to respond to all media inquires.

**3. Participating Entities**

**3.1 Unified Command**

N/A

### **3.2 Cooperating Agencies**

Local/county/state agencies are contacted on an as needed basis.

### **4. Personnel On Site**

Varies daily depending on site activities. During any activities involving hazardous substances, the EPA or an EPA representative is on site.

### **5. Definition of Terms**

ASAOC- Administrative Settlement Agreement and Order on Consent

PRP- Potentially Responsible Party

ECAD- Enforcement and Compliance Assurance Division

CID- Central Investigation Division

PIO- Public Information Officer

IDNR- Iowa Department of Natural Resources

### **6. Additional sources of information**

#### **6.1 Internet location of additional information/report**

<https://programs.iowadnr.gov/contaminatedsites/Site/Detail/2733>

#### **6.2 Reporting Schedule**

Additional PolReps will be submitted at the completion of on-site milestone accomplishments.

### **7. Situational Reference Materials**

IDNR is maintaining a public information site for this facility and the EPA will update the [response.epa.gov](https://www.epa.gov/response.epa.gov) site as appropriate. Multiple media articles have been published since the fire/explosion event that occurred on December 8, 2022.