

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, May 13, 2009

From: Steve Spurlin

Subject: Final Polrep

Plastech-Kenton, TN
515 N. Poplar Street, Kenton, TN
Latitude: 36.1255000
Longitude: -89.0936000

POLREP No.:	2	Site #:	A4YJ
Reporting Period:	2/17-4/30/2009	D.O. #:	0703-S4-0031
Start Date:	2/17/2009	Response Authority:	CERCLA
Mob Date:	2/17/2009	Response Type:	Emergency
Demob Date:	2/18/2009	NPL Status:	Non NPL
Completion Date:	4/30/2009	Incident Category:	Removal Action
CERCLIS ID #:	TND021953633	Contract #	EP-S4-07-03
RCRIS ID #:			

Site Description

The Plastech facility is a former plastic thermo-injection molding facility which is in bankruptcy. According to a former company employee, the facility closed operations in June 2008. The facility hired an environmental consultant who was tasked to consolidate and dispose of remaining waste at the facility. This action appears to have occurred; however, since closing, much of the equipment at the facility has been sold. It appears that parties salvaging the equipment have drained equipment fluids into drums and left the material on-site.

During a site visit conducted by OSC Spurlin, approximately 100 containers, mostly 55-gallon drums, were discovered scattered about the property. Oily liquids and spill residues were noted at various areas of the site. The property was accessible and many of the drums were stored in an unsecured out building.

Container markings included flammable and corrosive labels. Many of the drums were open and spill residue was noted on the exterior of the container and on the floor near the drums.

An EPA attorney has been in discussion with the bankruptcy representatives for Plastech. These parties have indicated they plan to file for abandonment of property and plan to have no further involvement with the property or environmental issues associated with the past operations.

Current Activities

On February 17, 2009, EPA OSC Spurlin mobilized EPA Emergency Response & Remediation Services (ERRS) contractor, WRS Inc., to the Plastech facility. The contractor utilized equipment and personnel to collect and stage the drums scattered around the facility.

The drums containing oily solids were consolidated into a rolloff container. Additional oily solids, primarily consisting of oil dry floor sweepings, were also consolidated into the rolloff.

START contractor, TTEMI Inc., conducted sampling of the drums to identify and characterize the waste materials. Representative samples were collected from the following waste streams staged on-site: Oil Solids, 1, 20 cubic yd rolloff; Oil liquids, 24, 55-gallon drums & 1-275 gal. tote (partial); unknown waste, 1, 55 gal., 1, 45 gal., 2, 35 gal. The initial actions were completed on February 18, 2009.

Planned Removal Actions

On April 3, 2009, WRS returned to the site to meet and assist H & H Oil Recovery company, Camden, TN., with pumping and transporting oil liquids for recycle at the H & H facility. Approximately 1100 gallons of used oil was sent for recycle.

On April 29, 2009, EPA returned to the site to meet American Environmental Services, Inc., who was contracted by WRS to transport and dispose of the remaining waste. OSC Spurlin signed manifest and observed loading of the following waste materials; 10, 55 gal drums Non-RCRA liquids (waste oil); 1,

275 gal tote Non-RCRA liquids (waste oil); 1, 55 gal drum Waste combustible liquid; 1, 40 gal & 1, 30 gal, fiber drum Non RCRA liquids; 1, 30 gal fiber drum Hazardous Waste liquid (D008).

Due to transporter error, the rolloff containing the oil solids, was not transported until April 30, 2009. The rolloff was transported by Evergreen Solutions for Capitol Environmental Services, Inc. The rolloff was shipped to the Northwest TN Landfill, Union City, TN. This completed the removal action.

Next Steps

The EPA Emergency Response & Removal Branch does not anticipate any further removal activities for the site. No visible spills, pits, lagoons, or discharge points were observed on the property outside the facility buildings.

Disposition of Wastes

The following waste materials were disposed of offsite through Capitol Environmental Services, a subcontractor for WRS:10, 55 gal drums Non-RCRA liquids (waste oil); 1, 275 gal tote Non-RCRA liquids (waste oil); 1, 55 gal drum Waste combustible liquid; 1, 40 gal & 1, 30 gal, fiber drum Non RCRA liquids; 1, 30 gal fiber drum Hazardous Waste liquid (D008).

H & H Oil Recovery Inc. picked-up 1100 gallons of used oil and transported to their Camden, TN facility for recycle.

The 20 cubic yard rolloff containing oily solids was transported to the Republic Services Inc., NW Tennessee Landfill in Union City, TN.

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