

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, December 19, 2003

From: David Andrews

Subject: \$200K ER Memorandum/ Initial Pollution Report

Dixie Barrel & Drum
2120 Jones Street, Knoxville, TN
Latitude: 35.9558000
Longitude: -83.9081000

POLREP No.:	1	Site #:	A4CK
Reporting Period:	1	D.O. #:	0207-F4-00-19
Start Date:	12/15/2003	Response Authority:	CERCLA
Mob Date:	12/15/2003	Response Type:	Emergency
Demob Date:	12/16/2003	NPL Status:	Non NPL
Completion Date:	12/16/2003	Incident Category:	Removal Action
CERCLIS ID #:	TND034692632	Contract #	68-S4-02-07
RCRIS ID #:			

Site Description

The Dixie Barrel and Drum Site ("Dixie Barrel" or the "Site") is located at 2120 Jones Street in Knoxville, Knox County, Tennessee. The Site is located in a light-industrial area south of downtown Knoxville, TN and approximately one-half mile to the south of the Tennessee River. Additionally, the Site is located on the northern fringe of a residential neighborhood and about several blocks south of an elementary school. At the time of the December 2003 assessment there was evidence of trespassing and vandalism.

From approximately 1976 to 2002, the Site operated as a plastic and steel drum recycling and reconditioning facility. The facility was permitted to accept used drums that contained less than 1 inch of product ["RCRA Empty"]. The reconditioning process [steel drum] involved several stages: The first stage involved manually removing the residues from the drums. The residues were bulked into other "waste drums" that were later shipped off site for disposal; The second stage was a series of corrosive rinses (concentrated acid & caustic); The third stage was an anti-corrosion treatment and preparation for paint; At some point in the processes, each drum went through a DOT specified integrity test in order to be legally sold as a "reconditioned" drum; The final step is repainting the drum and parking the drum into the inventory of the warehouse. Additional storage was located on adjacent property to the south and in a small house structure known as the "Dixie House".

During their operational years, Dixie Barrel maintained a contract with a waste disposal company that managed the waste generated from their reconditioning operations. Dixie Barrel also operated a system that recycled their process waste-water for reuse in their reconditioning processes and also treated their effluent prior to discharge to the City of Knoxville's POTW. Dixie Barrel was subject to City inspections of their effluent and also received periodic inspections by EPA's Resource Conservation and Recovery Act (RCRA) program. Dixie Barrel was cited for various RCRA violations. The Tennessee Department of Environment and Conservation (TDEC) issued a RCRA enforcement order to the facility in April 2002. The facility failed to comply with the requirements of the order, ceased operations, and filed for bankruptcy.

TDEC's Division of Superfund referred the site to the EPA Emergency Response and Removal Branch in August 2003 and requested a site assessment be performed. EPA conducted a removal assessment in October 2003. Samples collected during the assessment revealed numerous hazardous substances including lead, chromium, ethyl benzene, and trichloroethylene. Drums stored on site were found in poor condition and stored next to other incompatible chemicals thus elevating the risk of fire and explosion. Treatment vats containing concentrated acid and caustic were found open and posed a serious release and injury risk. The removal assessment data and other information laid the foundation to support a removal action by EPA.

On December 15, 2003 EPA and it's Emergency Rapid Response Service (ERRS) contractor responded to the site under an Emergency Action Memorandum to mitigate a release from a number of drums on the site and to secure areas of the site where the fence-line was breached by vandalism. On April 12, 2004 EPA, ERRS, and the Superfund Technical Assessment & Response Team (START) re-mobilized to Site under the existing Emergency Action Memorandum (amended March 10, 2004) to conduct a time-critical removal action to remove waste, threats of release, and effectively secure the Site from vandalism.

Current Activities

On December 15 & 16th, 2003, EPA Region 4 On-Scene Coordinator Spurlin initiated a response utilizing ERRS contractor Ferguson Harbor to address ongoing releases. Actions included shoveling contaminated soils and debris into drums, collecting oily liquids with absorbent material, placing absorbent boom in the drainage pathway, securing and covering drums with plastic, and locking all gates and doors

Planned Removal Actions

A fund ceiling increase will be requested in a follow-up Action Memorandum to support expanded removal operations.

Next Steps

Construct Action Memorandum to budget ceiling increase.

Key Issues

None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$6,470.88	\$43,529.12	87.06%
RST/START	\$10,000.00	\$0.00	\$10,000.00	100.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$2,000.00	\$500.00	\$1,500.00	75.00%
USEPA - InDirect	\$4,000.00	\$900.00	\$3,100.00	77.50%
Total Site Costs				
	\$66,000.00	\$7,870.88	\$58,129.12	88.07%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/DixieBarrel&Drum

POLREP #1 Last Updated 12/19/2006