

**United States Environmental Protection Agency**  
**Region IV**  
**POLLUTION REPORT**

**Date:** Friday, May 7, 2004

**From:** David Andrews

**Subject:** Pollution Report No. 5 (Phase II OPS Begin)

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

<b>POLREP No.:</b>	5	<b>Site #:</b>	A4CK
<b>Reporting Period:</b>		<b>D.O. #:</b>	0207-F4-00-19
<b>Start Date:</b>	4/12/2003	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	4/12/2003	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>	2/17/2005	<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>	5/28/2005	<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	TND034692632	<b>Contract #</b>	68-S4-02-07
<b>RCRIS ID #:</b>			

#### 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 its 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**

Actions taken from May 3 – May 6 are as follows:

1-) Continue Phase 2 Waste Consolidation & Disposal:

- Label and segregate drums per START HazCat data.
- Pump Acid Wash Tank contents (HCL) to Caustic Wash Tank (CWT) and waste water treatment (WWT) subsurface & conic tower sedimentation tank to adjust (lower) pH.
- START completes HazCat testing and demobes site mid-day May 4th.
- ERRS completes tasks on a short week and demobed site mid-day on May 6th.

### **Planned Removal Actions**

Activities planned for the next reporting period include:

Continue Removal Operations (Waste Removal)

1-) START will collect samples for analytical test from the WWT and CWT for disposal profile. ERRS will consolidate WWT & CWT into sludge boxes for disposal. Free liquids will be fixed with sawdust or compatible media.

2-) ERRS will bulk compatible drum waste into sludge boxes and START will collect composite samples for disposal profile.

### **Next Steps**

Looking ahead, START & ERRS will evaluate soil contamination in the vicinity of the rear building dock area and N.E. corner of the building.

### **Key Issues**

Evaluating HazCat Data into definitive waste streams per chemical compatibility, existing disposal technologies & \$\$Cost\$\$

[response.epa.gov/DixieBarrel&Drum](http://response.epa.gov/DixieBarrel&Drum)