

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Scrub-A-Dubb Barrel Co. - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Scrub-A-Dubb Barrel Co.
A6Z3
Lubbock, TX
Latitude: 33.6118227 Longitude: -101.8358266

To:
From: Greg Fife, OSC
Date: 3/29/2011
Reporting Period:

1. Introduction

1.1 Background

Site Number:	A6Z3	Contract Number:	EP-S6-07-01
D.O. Number:	0701-097	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	2/8/2011	Start Date:	2/8/2011
Demob Date:		Completion Date:	7/20/2011
CERCLIS ID:	txd097054878	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Classic Emergency

1.1.2 Site Description

The Scrub-A-Dubb Site (Site) is an inactive drum refurbisher. The owner/operator began the business in 1975. According to the permit and inspection files, Scrub-A-Dubb (SAD) would take drums from a variety of companies and sources, then clean, repair, and repaint the drums. SAD would then sell the drums. Drums that were in too poor of a condition to be refurbished or when the supply exceeded the demand, were stacked on the Site. It is evident that not all drums were empty or even RCRA-empty (40 CFR §261.7) were brought to the Site. It is estimated that more than 2,000 drums with significant quantities of hazardous waste are on the Site. Some drums are completely full of liquid waste. It is estimated that between 40,000 and 60,000 drums remain onsite. At this time, is not possible to assess the number and condition of other drums that may be underneath the piles of drums.

The refurbishing process employed by SAD included rinsing the interior and washing the exterior of the drums with water. That water and contents of the drums was drained into a waste water treatment system comprised of several settling vats. The vats have discarded hoses, tanks, and other material dumped in them. The vats have been the source of previous releases that have gone offsite. During the most recent visit in October 2010 by EPA, the vats had minimal freeboard left.

In October 2010, representatives from the Texas Commission on Environmental Quality (TCEQ) contacted EPA's Prevention and Response Branch seeking assistance at the Site. TCEQ had referred the Site to other EPA programs when the facility was still operating, and attempts were made to bring the company into compliance. However, in December of 2009, the owner/operator suffered the first of several health-related problems. The business operations have ceased at the Site. SAD is in the process of selling off company assets.

1.1.2.1 Location

The Site is located at 1102 North Ash Avenue, Lubbock, Texas. The Site is two separate tracts of land on opposite sides of North Ash. The tract at 1102 North Ash is approximately 3.12 acres. The frontage on North Ash is approximately 200 feet. It extends approximately 700 feet to the east. Single family homes are located to the north and a home and a salvage yard are located to the south. Commercial businesses are across the street and to the west. Agricultural land is to the east..

The tract across the street is at 1201 North Ash. This tract is approximately 2 acres with a frontage of about 300 feet. The front gates face the same residential area that is adjacent to the primary tract. Commercial businesses are on the other sides of the tract.

Latitude: 33° 36.66' N, Longitude: 101° 50.18' W

1.1.2.2 Description of Threat

The current conditions at the Site meet the following factors which indicate that the Site is a threat to the public health, welfare and the environment and a removal action is appropriate under Section 300.415(b)(2) of the National Contingency Plan. Any or all of these factors may be present at the Site yet any one of these factors may determine the appropriateness of a removal action.

1. Actual or Potential Exposure to Nearby Populations, Animals, or the Food Chain From Hazardous Substance or Pollutants or contaminants. NCP Section 300.415(b)(2)(i)

The east portion of the Site is fenced but has been damaged or modified in several areas. The west side, 1201 N Ash, lacks any gates on its multiple access points. For the purposes of this action, the threat is from contact with the contents of the waste water treatment system. The vats are open and easily accessible. There are no fences or other barriers around the system. People gaining access to the Site can come into contact with the contents of the vats. If the contents breach the containment, simply walking across the main part of the facility will expose people to hazardous substances.

2 Actual or Potential Contamination of Drinking Water Supplies or Sensitive Ecosystems. NCP Section 300.415(b)(2)(ii)

The walls of the vats of the waste water treatment system are eroding and falling apart. Large sections of the walls have broken loose and allowing the contents to come into contact with the soils surrounding and underneath the vats. The potential for contaminating the ground water exists but it is unknown pending further investigation if the contamination is reaching a drinking water source.

3 Hazardous Substances or Pollutants or Contaminants in Drums, Barrels, Tanks or Other Bulk Storage Containers That May Pose a Threat of Release. NCP Section 300.415(b)(2)(iii)

There are more than 2,000 drums with hazardous substances in them. TCEQ reports the presence of several underground storage tanks. This action addresses the content of the vats within the waste water treatment system. On at least two previous instances, releases from these vats resulted in responses to address the spill. Hazardous substances overflowed the vats and flowed off the Site into nearby Blackwater Draw and subsequently through Mackenzie recreational park. The runoff is easily accessible to children at play in the park, golfers, Frisbee golfers and the park's wildlife. There is minimal freeboard left in the vats. The typical precipitation for Lubbock will cause the vats to overflow resulting in a release of hazardous substances.

4. Weather Conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. NCP Section 300.415(b)(2)(v)

The normal precipitation for Lubbock is enough to cause the displacement of the lighter contaminants from the vats. The normal precipitation is highest in the spring and summer, with nearly 3 inches expected in June. One day rain totals have surpassed 5 inches and snow has been reported at over a foot deep in a single day. Similar events have occurred in the past. The available freeboard is not adequate to contain the additional burden from the precipitation. Releases and runoff could cause additional damage to the compromised and weakened vat walls leading to catastrophic failure of the vats.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Crews mobilized in on February 8th, 2011 to begin pumping down the waste water treatment vats and conduct work to secure the site. Icy roads and single digit temperatures prevented the trucks from leaving their yard. Other obligations by the trucking company resulted pushing back the action until February 15th.

2.1.2 Response Actions to Date

On 15 February 2011, EPA, ERRS and START personnel completed the pump down of the waste water treatment vats. Approximately 2,800 gallons of non-hazardous/non regulated oily water and sludge was pumped from the vats and transported and disposed at Republic Services in Canyon, Texas.

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

Names and other information on drums are collected in order to build a list of PRPs. Other enforcement action is being conducted via investigations and discovery of trip tickets, client

billing and other documents. The pump down of the vats will allow time for the enforcement activities to continue to hopefully find viable PRPs.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Enforcement is working on the PRP identification.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.