U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Post Road Drum Site - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #1**
First & Final
Post Road Drum Site

Anchorage, AK
Latitude: 61.2234720 Longitude: -149.8613890

To:
From: Earl Liverman, OSC
Date: 8/1/2011
Reporting Period:

1. Introduction

1.1 Background

Site Number:	10KF	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	5/31/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/1/2011	**Start Date:**	8/1/2011
Demob Date:	9/29/2011	**Completion Date:**	9/29/2011
CERCLIS ID:	AKN001002918	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

The Site is a fenced storage lot located within a commercial and industrial area within the municipality of Anchorage.

1.1.2 Site Description

1.1.2.1 Location

The Site latitude is N 61.22346 and the longitude is W 149.86130.

Several businesses are located in close proximity to the Site. A public use trail “Ship Creek Trail” passes within a hundred feet of the Site and lies adjacent to Ship Creek. The nearest residential neighborhood is within one half mile of the Site. Stacks of drums and containers at the Site are situated in tight groups on and around trailers and abandoned equipment. The Site occupies an area contained by a chainlink fence with the dimensions of approximately 90 feet by 100 feet. No advisory or warning signage exists on any of the fenced area.

1.1.2.2 Description of Threat

The contaminants of concern are wastes that meet the RCRA characteristic for ignitability based on flashpoint and oxidizer analyses, and wastes that meet the RCRA characteristic for toxicity, including benzene, chromium, and lead. The containers have been stored in the out-of-doors since 2005 or 2006, and many of the containers are of questionable structural integrity.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In early November 2010, EPA received a citizen complaint regarding several 55 gallon drums that appeared to be abandoned at the Site. The complainant also alleged that many of the drums were leaking hazardous liquids onto the ground.

On 10 November 2010, EPA visited the Site and walked the Site perimeter. From the fenceline, an estimated 400 containers, mostly 55-gallon drums and a few 5-gallon pails, were observed to be precariously stacked on vehicles, trailers or the ground and were scattered about the Site. Labels stating “flammable liquid” and “organic peroxide” were observed on many containers, and many of the drums appeared to be in poor condition.

From 15 December through 17 December 2010, EPA and START contractor personnel returned to the Site and conducted a Removal Site Evaluation (RSE). Many of the containers were in various states of

deterioration as evidenced by bulging, corrosion, and other physical damage such as dented or distorted surfaces. Access to the Site was obtained under both a signed access agreement and a warrant. Once on-Site, 183 containers were staged and inventoried, including 178 55-gallon drums, 4 5-gallon pails, and 1 presusurized paint vessel. Additionally, an estimated 160 55-gallon drums, 130 5-gallon pails, 2 250-gallon storage totes, and 1 pressurized paint vessel were not inventoried or sampled because they were inaccessible due to safety considerations and field time constraints.

A representative sample of approximately 50 of the 178 staged 55-gallon drums were opened to visually examine their contents. Many drums contained liquids resembling yellow and white paint materials though these liquids were more viscous than normal given the sub-zero conditions. Container content levels varied from near-empty to near-full. During the drum inspection process, air monitoring readings were taken over the openings utilizing a photoiononization detector (PID) instrument. Instrument readings varied from non-detect to several hundred parts per million (ppm) in close vicinity of the open drums, thus indicating the presence of Volatile Organic Compounds (VOC's). Individual grab samples were collected from three of the 50 representative 55-gallon drums for on-Site Hazard Categorization Screening (HCS). Results indicated that the contents of two of the three drums exhibited a flash point of less than 140 °F, which meets criteria for the hazardous waste characteristic of ignitability under EPA's RCRA regulation (40 CFR § 261.21). One of the HCS drums along six other 55-gallon drums were chosen for confirmation laboratory analysis. These drums were selected based on HCS results, the representativeness of the different drum identification markings, the representativeness of the differrent types of materials observed in the drums, and a bias towards those containers exhibiting higher PID readings. Results indicated: three of the seven drums meet RCRA hazardous waste criteria for ignitability based on flashpoint and oxidizer testing; three of the seven drums indicated levels of benzene at 100 milgrams per kilogram (mg/kg), 2,700 mg/kg and 960 mg/kg, respectively; and two of five samples analyzed for "Total Metals" showed chromium at 10,000 mg/kg and 1,600 mg/kg and lead at 37,000 mg/kg and 15,000 mg/kg.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On 1 August 2011, the responsible parties' (RP) contractor initiated characterization of of approximately 321 55-gallon drums, 179 5-gallon pails, and 2 200-gallon totes. Site characterization activities were completed on 5 August 2011.

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

The PRPs have been identified and an ASAOC was approved 07/29/11.

2.1.4 Progress Metrics

Refer to attached final Removal Report for a summary of waste removed from the Site.

2.2 Planning Section

2.2.1 Anticipated Activities All cleanup actions have been completed; no further action is contenmplated at this time.

2.2.1.1 Planned Response Activities

When the analytical results were received, the various wastes were consolidated, packaged, and transported off-Site for disposal.

2.2.1.2 Next Steps

See Section 2.2.1.

2.2.2 Issues

None.

2.3 Logistics Section

Sufficient material resources were made available for conduct of the removal action.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

There was a health and safety officer on-Site during conduct of the removal action.

2.6 Liaison Officer

When required, the role and responsibilities of a liaison officer are being fulfilled by the EPA OSC.

2.7 Information Officer

2.7.1 Public Information Officer

When required, the roles and responsibilities of a public information officer are being fulfilled by the EPA OSC.

2.7.2 Community Involvement Coordinator

When required, the roles and responsibilities of a community involvement coordinator are being fulfilled by the EPA OSC.

3. Participating Entities

3.1 Unified Command

The framework for management of the removal action includes EPA and the PRPs cleanup contractor.

3.2 Cooperating Agencies

There are no cooperating or assisting agencies involved with the removal action.

4. Personnel On Site

EPA - 1 OSC providing oversight of the PRP-lead cleanup action.
Emerald Alaska (PRP's contractor): 1 project manager; 1 health & safety officer; 2 field technicians.

5. Definition of Terms

None.

6. Additional sources of information

6.1 Internet location of additional information/report

None.

6.2 Reporting Schedule

Only an initial and final POLREP will be prepared given the size and duration of this cleanup action.

7. Situational Reference Materials

None.