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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #4**
Recovering and staging Drum, Shredding the empties
Scrub-A-Dubb Barrel Co.
A6Z3
Lubbock, TX
Latitude: 33.6118227 Longitude: -101.8358266

To:
From: Greg Fife, OSC
Date: 9/15/2011
Reporting Period: 9/15/2011

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:**	
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.

A fire started as a result of unauthorized people cutting the tops off of drums to be used as waste drums. People continue to dump drums, as well as remove a few drums for burn drums or waste drums.

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 FromHazardous 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 precious 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 addition 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 have recovered almost 600 drums that contain significant quantities of material. Those drums are being staged and ready for sampling and field characterization. The contents will then be consolidated into waste groups, bulked or packaged and sent for offsite disposal. Many of the drums staged are full or almost full. Quick haz-catting of the liquid in some of the drums shows hazardous pH levels, flammables and other volatile chemicals.

On 7 September 2011 a Mobile Rotary Shear Shredder 1005 unit arrived onsite. The Mobile Rotary Shear Shredder is a hydraulically operated grinding unit which has the capacity of processing 80 drums per hour. Along with the Shredder unit, a Catepillar 315 excavator with a claw and thumb attachment was delivered onsite for the purpose of drum handling. The Shredder unit was assembled on the lot located on the East tract (at 1102 North Ash) and a successful test run was performed on 8 September, 2011. Drum shredding operations commenced on 9 September, 2011 with approximately 800 poly drums being processed. As of the end of day on 12 September, 2011, approximately 2,500 empty and RCRA-empty (40 CFR §261.7) High Density Polyethylene (HDPE) drums have been shredded.

Initial drum shredding operations consist of: ERRS crews identifying empty or RCRA-empty drums, unscrewing one of the bungs, loading the drums onto one of two forklifts outfitted with modified drum baskets, transporting the drums from either the West tract or the East tract to the Shredder unit loading area, then loading of the drums into the shredder hopper via the Caterpillar 315 excavator. After being shredded the waste plastic is stockpiled on a reinforced poly containment area and then loaded into 40 yard steel roll-off style dumpster containers. When full, the roll-off containers are transported offsite to the approved landfill in Canyon, TX.

2.1.5 Air Monitoring and Removal Documentation Activities

During the drum shredding operations START monitors site air quality for CO, H_2S, VOCs, O_2 and LEL levels via wireless and handheld RAE multigas detectors. MultiRAE Plus and AreaRAE detetctors along with a RAElink

wireless remote system have been utilized for monitoring the air quality parameters on this project. A perimeter consisting of 4 AreaRAE detectors was established around the exclusion zone fence line on the East tract where the Shredder was operating in order to monitor the air quality leaving the site. Additionally, a hand held MultiRAE Plus detector was used to monitor air quality throughout the site with specific targets including: ERRS shredder operator, ERRS drum gathering worker, shredded plastic stockpile and shredder proximity. START monitors the air quality in real time with streaming data that is available for examination wirelessly from the detectors through ProRAE Remote software.

To assess the influence of wind direction and weather on air quality parameters associated with the drum shredding operation, START has employed the use of a Climatronics 102603 Weather station onsite. The wind direction is monitored simultaneously with any vapor releases to determine best mustering location in the event of a evacuation.

In addition to monitoring air quality in and around the drum shredding operation, START has been tasked with documenting site activities and real progress in the removal and cleanup process. A GPS enabled camera is used to document system flow and provide photodocumentation of the entire process.

2.2 Planning Section

No information available at this time.

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.