

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Barrio Vietnam Drum Storage Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #2**
SPECIAL #1: Inventory of Chemicals Begins
Barrio Vietnam Drum Storage Site
A290
Guaynabo, PR
Latitude: 18.4394520 Longitude: -66.1132810

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From: Paul Kahn, OSC
Date: 10/5/2011
Reporting Period:

1. Introduction

1.1 Background

Site Number:	A290	Contract Number:	EP-S2-10-03
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/30/2011	Start Date:	10/5/2011

Demob Date:	Completion Date:
CERCLIS ID:	RCRIS ID:
ERNS No.:	State Notification:
FPN#:	Reimbursable Account #:

1.1.1 Incident Category

Abandoned drums and other types of chemical containers.

1.1.2 Site Description

The Responsible Party (RP) is an individual, now deceased, who operated an off-spec chemical distribution company, shipping these chemicals to such places as the Dominican Republic.

1.1.2.1 Location

The site is on a large parcel of land in a mixed residential/commercial area of Guaynabo Municipality, about 7 miles south of the City of San Juan.

1.1.2.2 Description of Threat

The site contains approximately 1,0000 containers consisting of more than 100 55 gallon drums, chemical totes, bags, and hundreds of other containers of chemicals, most of which are not labeled, stored in a dilapidated, partially collapsed warehouse on the grounds of a private residence. Many of the containers are leaking or have leaked their contents onto the ground. The chemicals are haphazardly stored, and in some instances piled on top of each other. There is no site security and there is no one to monitor site conditions.

Preliminary Removal Assessment/Removal Site Inspection Results

The site was discovered through a 'tip' to the FBI. Agents responded and discovered the dangerous conditions at the site. The FBI notified the Coast Guard because the site is in Coast Guard jurisdiction. The Coast Guard then referred the site to EPA via a formal Statement of Agreement between Sector San Juan and Region 2 ERRD.

EPA OSCs with the Caribbean Environmental Protection Division (CEPD) performed an assessment of the site on 9/27/2011 and determined that conditions were so dangerous that an emergency removal action was necessary. Verbal authorization for \$250,000 in CERCLA funds was obtained from ERRED upper management, an ERRS contractor was selected and tasked to perform the removal action. As of 9/28/2011 plans are underway to mobilize the ERRS contractor and an OSC to the site on 10/4/2011 to initiate stabilization of the chemicals and post security guards.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

A removal contractor has been selected and funded with a Superfund account. Plans are in effect to mobilize the contractor and the OSC to the site on 10/4/2011 to initiate an emergency removal action.

The ERRS contractor arrived on site on 10/4/2011 and began to deploy site support assets. Security guard service in effect since 9/30/2011. ERRS has started documenting drum labels and obtaining a rough container count. Removal Support Contractor (RST) is on site and is conducting work-place and perimeter air monitoring.

Actual site conditions are far worse than original site assessment stated. There are hundreds more containers than originally observed, and the conditions of most of the chemicals is much worse than depicted in the early photos.

Plans are underway to rent a vacant house adjacent to the site for a command post. Officials from Guaynabo Municipality on site to discuss contingency plans for temporary relocation of resident downwind of the site. Meeting with municipal officials including Public Safety, Fire, Housing and office of the Mayor.

Meeting held on site with the owner's widow regarding history of business operations that were conducted at the site.

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

No additional information about PRPs has come to light as of this date.

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

ERRS will continue setting up support assets and completing a rough drum count/inventory. ERRS will maintain security guard services and support services.

2.2.1.1 Planned Response Activities

Pending receipt of additional funds ERRS will continue compiling drum inventory and RST will continue to conduct work-place and perimeter air monitoring. Meeting with Municipal officials scheduled for 10/7/2011 to discuss removal strategy, emergency contingency planning, and possible relocating of down-wind residents.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

Current issues are the threat of the unknown chemicals, safely segregating and staging the unknowns, and safeguarding the chemicals until they can be sampled and identified.

2.3 Logistics Section

TBD

2.4 Finance Section

2.4.1 Narrative

An initial amount of \$250,000 has been verbally authorized for a response action at this site. **Based on the site conditions significant increase in funding will be needed to complete the removal action.**

2.5 Other Command Staff

2.5.1 Safety Officer

TBD

2.6 Liaison Officer

n/a

2.7 Information Officer

2.7.1 Public Information Officer

TBD

2.7.2 Community Involvement Coordinator

TBD

3. Participating Entities

3.1 Unified Command

n/a

3.2 Cooperating Agencies

Various departments of the Municipality of Guaynabo.

4. Personnel On Site

EPA On-Scene Coordinator

Commercial haz-mat clean-up contractor: Environmental Restoration Inc.

Technical support contractor: Weston Solutions, Inc.

5. Definition of Terms

n/a

6. Additional sources of information

6.1 Internet location of additional information/report

n/a

6.2 Reporting Schedule

TBD

7. Situational Reference Materials

Refer to Documents Section of the web site.

POLREP #2 Last Updated 11/4/2011