

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #3
Site Stabilization Activities Underway
Barrio Vietnam Drum Storage Site
A290
Guaynabo, PR
Latitude: 18.4394520 Longitude: -66.1132810

To: Paul Kahn, ERRD-RPB
Sonia Cosme, EDS Inc.
Ada Bones, Municipality of Guaynabo
Ernesto Santiago, Municipality of Guaynabo

From: Paul Kahn, OSC

Date: 10/12/2011

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A290	Contract Number:	EP-S2-10-03
D.O. Number:	0039	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 Site was an illegal chemical warehouse. The former owner/operator was an individual, now deceased, who bought off-spec/rejected/discontinued chemicals from major chemical companies and attempted to ship the chemicals to such places as the Dominican Republic.

1.1.2.1 Location

The Site is on a large parcel of land in a residential area of Guaynabo Municipality, about 7 miles south of San Juan.

1.1.2.2 Description of Threat

The Site contains approximately 1,000 containers consisting of more than 200 55-gallon drums, chemical totes, bags, and hundreds of other containers of chemicals, many which are not labeled, and stored in dilapidated, partially collapsed warehouses 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 many areas piled on top of each other or have spilled onto each other. There was no site security and there was 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 10/12/2011 ERRS has started stabilizing the chemicals and has posted 24/7 armed 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.

ERRS has made significant progress clearing non-haz debris from much of the Site, allowing access to drums and other containers that were inaccessible. Tons of debris have been removed, junked cars have been removed and one of two 40 foot box trailers has been removed. Tons of scrap metal are staged pending arrival of recycling roll-offs. The Command Post has been established in a vacant house adjacent to the Site. ERRS has begun overpacking leaking drums.

The City of Guaynabo is cooperating with EPA and is assisting in many aspect of the removal action. The City is providing free garbage and recycling dumpsters, has removed a large derelict motor boat from the Site, the Haz-Mat squad has toured the Site and will be setting up their response truck in a vacant lot adjacent to the Site. The City has asked to meet with EPA once a week to track progress and discuss any issues that arise.

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

The OSC has identified hundreds of chemical containers from two local companies, Ecolab Inc. and Olay LLC. These chemicals were either rejected or sold as off-spec or discontinued chemicals. Both companies have been approached by the OSC and have agreed to take custody of the containers when they have all been located and cleaned. It is estimated that the containers from both of these companies constitutes approx. 70% of the total number of containers at the Site. There are other containers at the Site which have company markings and efforts will continue to contact those companies and solicit their cooperation.

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 also continue overpacking leaking and deteriorated drums. Security guard services and Site support services will be maintained..

2.2.1.1 Planned Response Activities

See above. In addition RST will continue to conduct work-place and perimeter air monitoring. Meeting with

Municipal officials is scheduled for every Tuesday 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

No information available at this time.

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.