

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #6
Consolidating, bulking, and staging drums
Scrub-A-Dubb Barrel Co.
A6Z3
Lubbock, TX
Latitude: 33.6118227 Longitude: -101.8358266

To:
From: Greg Fife, OSC
Date: 12/13/2011
Reporting Period: 11/1/2011-11/30/11

1. Introduction

1.1 Background

Site Number:	A6Z3	Contract Number:	EP-S6-07-01
D.O. Number:	0701-097	Action Memo Date:	9/1/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/29/2011	Start Date:	8/30/2011
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 refurbishing company that began operation in 1975. The site consists of two tracts of land split by North Ash Avenue; 40,000 to 60,000 drums in varying condition and with varying volumes; two buildings; four covered trailers; two above ground storage tanks; two earthen pits; five concrete impoundments (vats); and miscellaneous debris. 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 for resale and re-use. Excess and poor condition drums were stored onsite. Of the 40,000 to 60,000 drums onsite, over 2,000 contain varying volumes of hazardous substances. According to the owner or operators, accepted drums were not always RCRA-empty (40 CFR 261.7) when received.

The Site got attention as a result of a fire when unauthorized persons accessed the west tract and cut drum tops off.

1.1.2.1 Location

The Site address is 1102 North Ash Avenue, Lubbock, Texas and consists of two separate tracts of land on opposite sides of North Ash. The 200 foot by 700 foot east tract at 1102 North Ash is approximately 3.12 acres, and neighbors single family homes on the north and a home and salvage yard to the south. Commercial businesses are across the street and to the west. Agricultural land is to the east.

The 300 foot by 300 foot west tract across the street is at 1201 North Ash and is approximately 2 acres. The adjacent properties are single family homes to the east and commercial businesses on the other sides.

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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 oil vats. The vats consist of a knee-high concrete containment wall and are open-air and easily accessible. There are no fences or other barriers around the system. People gaining access to the Site can readily 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 waste oil vats 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.

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 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

During the initial site walk, tens of thousands of drums were found in varying condition with varying volumes and contents. Some of the substances found include low and high pH corrosives, flammables, carcinogenics, teratogenics, and regulated compounds. Additionally found were three underground storage tanks, two earthen pits with buried drums, saddle tank foundations, five concrete containment vats with varying contents and significant staining around the site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

USEPA START and ERRS contractors are onsite and staging drums for vacuum truck fluids collection "stinging" of waste for transportation and offsite disposal.

The mobile rotary drum shredder, conveyor and caterpillar excavator were decontaminated and transported offsite following completion of empty drum shredding operations. Pits, vats and other onsite ASTs will be vacuum-drained of their contents and disposed of at off-site facilities. Analytical data from soil samples collected on the west tract are pending. Depending on the results soil will be excavated and disposed off-site.

2.1.2 Response Actions to Date

A preliminary site assessment was conducted on 12/27/10 to 12/28/10. During the preliminary assessment START contractor performed air monitoring and documented the site condition.

As of 2/15/11, EPA, ERRS and START personnel completed the pump down of the concrete impoundment vats. Approximately 2,800 gallons of non-hazardous/non regulated oily water and sludge was pumped from the vats by Republic Services then transported to and disposed of at Southwest Landfill in Canyon, Texas.

From 7/18/11 through 7/20/11 the EPA START contractor conducted preliminary HAZCAT field classification and drum sampling for laboratory analysis on a hand-picked group of drums from the east and west tract.

As of 8/30/11 EPA crews have mobilized to the Site to begin clearing and establishing areas to stage the drums with significant volumes and for the shredding operations. Drums with contents will be isolated. The contents will be characterized, grouped and bulked for potential treatment and off-site disposal. The drums will be shredded and sent for disposal off-site.

On 9/7/11 ERRS subcontractor Tri Rinse arrived on-site with a trailer-mounted rotary drum shredder for drum disposal. Drum shredding operations commenced on 9/8/2011, and roll-off dumpsters containing shredded

drum waste began departing site via Republic Waste on 9/14/11.

On 11/18/11 drum shredding operation ceased and decontamination of the shredder unit and excavator began. A total of 44,340 RCRA-empty drums were shredded using the unit.

From 11/28/11 through 12/1/11 the EPA START contractor conducted a soil sampling event on the west tract. A total of 148 field samples, fifteen field duplicate samples, seven lab QA/QC samples, seven trip blanks, three field blanks, and two rinsate blanks were collected and shipped for CLP analysis.

On 11/30/11 ERRS subcontractor Tri Rinse demobilized the Shredder unit and departed the Site.

As of 12/8/11 a total of 44,340 drums have been shredded and the waste disposed of; an estimated 5,000 drums have been HAZCAT field screened and bulked into approximately 1,800 drums of waste; waste samples are being analyzed for characterization and disposal; soil sampling has been conducted on the west tract for contamination profiling purposes; brush and debris has been cleared from the surface of the ground on both the east and west tracts in preparation for the soil excavation.

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

At this time the PRP for this site is Scrub-A-Dubb Barrel Company.

2.1.4 Progress Metrics

Drum disposal operations using a mobile rotary grinder produce a stockpile of either shredded plastic or steel. Shredded plastic and steel materials are disposed of at the Southwest Landfill in canyon, TX.

'RCRA empty container' consists of the shredded drum material produced from the 44,430 drums disposed of by the mobile rotary shredder.

2.1.5 Air Monitoring

During the drum shredding operations, START monitored the air quality on-site using five-gas RAE Systems multigas detectors. Air quality parameters included CO, H₂S, VOCs, O₂ and LEL. MultiRAE Plus and AreaRAE detectors along with a RAElink wireless remote telemetry system have been utilized for monitoring the air quality parameters. Four AreaRAE detectors were utilized around the exclusion zone fence line on the East tract during the Shredder operations in order to monitor the air quality entering and leaving the site. Additionally, a hand held MultiRAE Plus detector was used to monitor air quality throughout the site and in specific areas of operation: shredder operator, drum recovery, shredder output stockpile and the vicinity. START monitored the air quality in real time with streaming output data using ProRAE Remote software. Consistently safe levels of air parameters were recorded at the site during the shredder operations.

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

To determine PPE requirements and to assess dust control measures during contaminated soil excavation three Thermo DataRam4 particulate dust monitors have been retained. A wireless telemetry communications system is being implemented for real-time recording and monitoring of particulates generated on-site during this action.

2.1.6 Container Inventory

In addition to documenting the removal action, a container database or drum tracking inventory was also created. Drums that were not empty were assigned a unique drum tracking number (D000123, D000124, etc.), photographed and assessed. Information recorded for each drum in the container database includes contents, label and markings, manufacturer special handling information, special handling procedures, HAZCAT classification, container size, container condition, type and approximate volume of contents. Duplicate drums were not recorded; however, drums which originated from the same manufacturer but possessed unique product content were inventoried in order to accrue a comprehensive list of products from each manufacturer.

2.1.7 Container HAZCAT Field Screening and Content Bulking

Drums identified to contain greater than half an inch ($> \frac{1}{2}$ in) of content were staged and field screened. Drum content was categorized according to pH, miscibility with water, and flammability tests. Drums were categorized into groups of: Acids (pH 0-3), Neutrals (pH 4-10), Basics (pH 11-14), Oils, Flammables, Solids and Unknowns. Like materials were bulked and consolidated. A total of 1,796 steel and poly containers have been bulked to date. Approximately 1,800 full drums are segregated and staged on the east tract awaiting transportation and disposal. After drums were emptied, they were moved to the shredder loading area for shredding.

2.1.8 Drum Shredding Activities

On 9/7/2011 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. The entire unit consists of three diesel engines, a hydraulically powered low speed shredder module, a hopper feeder and a conveyor belt attachment for stockpiling the waste material. Along with the Shredder unit a Caterpillar 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 the first successful test run was performed on 9/8/2011. Drum shredding operations commenced on 9/9/2011 with approximately 800 poly drums being processed. Drum shredding operations ceased on 11/18/2011 with a total of 44,340 RCRA-empty drums being processed.

Poly drums were shredded first, followed by steel. Initial drum shredding operations consisted of: ERRS crews identifying empty or RCRA-empty drums, 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 or steel is stockpiled on a reinforced poly containment area and then loaded into 30 and 40 cubic yard steel roll-off containers. When full, the roll-off containers are transported offsite to the Southwest Landfill in Canyon, TX.

Drum Shredding Progress by Week:

Dates	Weekly Drums Shredded	Total Drums Shredded
9/8/2011 thru 9/10/2011	1,677	1,677
9/12/2011 thru 9/17/2011	3,678	5,355
9/19/2011 thru 9/24/2011	3,018	8,373
9/26/2011 thru 10/1/2011	2,710	11,083
10/3/2011 thru 10/5/2011	2,477	13,560
10/11/2011 thru 10/15/2011	5,544	19,104
10/17/2011 thru 10/22/2011	7,340	26,444
10/24/2011 thru 10/27/2011	3,820	30,264
11/1/2011 thru 11/5/2011	6,760	37,024
11/7/2011 thru 11/12/2011	5,755	42,779
11/14/2011 thru 11/18/2011	1,561	44,340

2.1.9 Shredded Drum Materials Disposal

The Mobile Rotary Shear Shredder has the capacity of processing up to 1,400 drums per day. A conveyor belt deposits the shredded drum materials (either poly or steel) onto an adjacent stockpile inside poly containment. After shredded drum materials are stockpiled, they are loaded into 30 or 40-cubic yard steel roll-off containers via a Caterpillar 315 excavator with a claw and thumb attachment. Shredded drum materials are classified as RCRA empty containers and transported by Republic Services to the Southwest Landfill in Canyon, Texas for disposal. To date 101 roll off containers have been manifested and shipped. The shredder was taken out of operation, decontaminated and demobilized on 12/1/11.

2.1.10 Soil Investigation on West Tract

After all the drums were removed from the west tract a soil sampling event was conducted from 11/28/11 through 12/1/11. Prior to sampling the tract was divided-up into 47 separate 50-foot by 50-foot units. Due to site irregularity multiple cells were merged, and a total 37 grids were sampled on the west tract. During the sampling event a total of six soil cores were collected from each grid cell per normal protocol to include a 5-point composite sample for metals and SVOC and a single grab sample for volatiles analysis. Duplicate and QA/QC samples were collected as required. Soil cores were collected using hydraulic Geoprobe Systems direct-push unit. Samples were packaged, handled and shipped using USEPA Contract Laboratory Program (CLP) sample collection and handling protocol. Following collection and packaging, samples were shipped inside custody-sealed chest coolers with their appropriate documentation to the respective laboratory for analysis. A total of 148 field samples, fifteen field duplicate samples, seven lab QA/QC samples, seven trip blanks, three field blanks, and two rinsate blanks were collected and shipped for CLP analysis.

2.2 Planning Section

This removal action is tentatively expected to continue through February 2012

2.2.1 Anticipated Activities

Hazardous substances will be profiled and disposed of appropriately. The east tract soils will be assessed. Contaminated soils will be excavated and disposed of appropriately. Excavated areas will be backfilled. Additional removal activities will be conducted as site conditions warrant response efforts.

2.2.1.1 Planned Response Activities

Drum sampling will be conducted during this month (December). Drums will be shipped as profiles for the waste are approved. The east tract soil sampling is tentatively scheduled for the first week of January 2012. Soil excavation will be conducted on the west and east tracts as soon as possible after assessment results are received and plans are made. Excavated areas will be backfilled as soon as possible after excavations are completed.

2.2.1.2 Next Steps

Container segregation and staging will be completed. Staged substances will be sampled and profiled for waste characterization profiling.

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

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

This is an EPA-led removal action.

3.2 Cooperating and Assisting Agencies

The Texas Commission on Environmental Quality (TCEQ) is a cooperating partner.

4. Personnel On Site

Personnel onsite include EPA and EPA contractors.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/reports

Additional information can be obtained at: http://www.epaossc.org/site/site_profile.aspx?site_id=6588

6.2 Reporting Schedule

POLREPS will be provided monthly or as significant events occur outside normal operations.

7. Situational Reference Materials

No information available at this time.