

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Polychem Services, Inc., LLC - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial and Final POLREP/Leaking Containers and Offsite Release Secured
Polychem Services, Inc., LLC
C5C1
Chicago Heights, IL
Latitude: 41.5206835 Longitude: -87.6180390

To:
From: Ramon Mendoza, On-Scene Coordinator
Date: 2/8/2012
Reporting Period: February 1-6, 2012

1. Introduction

1.1 Background

Site Number:	C5C1	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	2/1/2012	Start Date:	2/1/2012
Demob Date:	2/6/2012	Completion Date:	2/6/2012
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

PRP Oversight
CERCLA Emergency Removal

1.1.2 Site Description

Polychem Services Inc. owns and operates a medium-sized chemical conversion facility occupying approximately 4 acres in an industrial area of Chicago Heights, IL. The facility currently reprocesses amines for reuse in the Foundry industry. There are hundreds of drums and plastic totes, many of which are leaking and are in a deteriorated condition in the west, north, and east areas of the facility. The aforementioned containers may contain hazardous substances and pollutants such as volatile organic compounds, corrosives, and flammables.

1.1.2.1 Location

Site is located at 374 E. Joe Orr Road in Chicago Heights, IL. The Site is located in an industrial area with railroad tracks running along the east and south fenceline of the property. Directly east and north are active warehouses. Thorn Creek Basin Sanitary Plant is about 1000 feet to the northwest. There are residential areas within a half mile of the Site to the northwest, west; with the closest homes about 2000 feet to the southwest.

1.1.2.2 Description of Threat

See Section 1.1.3

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

USEPA conducted a CERCLA Site Assessment at the site from January 25-27, 2012 due to the presence of hundreds of drums and plastic totes at the Site which appear to have been abandoned and are suspected of containing hazardous substances and pollutants. Preliminary results of the investigation confirmed 56 leaking drums, three of which were confirmed to contain and leaking hazardous substances (benzene and flammables). In addition, surface water runoff appears to be carrying hazardous substances and pollutants off-site past the west fenceline into a stormwater ditch and drain.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

As indicated in Section 2.1.3, **EPA OSC oversaw and directed Polychem contractors to conduct the following actions to stop the release of hazardous substances and pollutants from leaking containers at the Site.**

2.1.2 Response Actions to Date:

EPA OSC and its START contractor Weston arrived at the Site on 2/01/2012. Weston conducted air monitoring during cleanup operations using a MultiRAE PID to ensure worker safety during the entire response.

2/1/2012 – Off-site Release Secured:

- a. Release outside of the facility towards the storm drain was secured/ stopped at the fenceline through the installation of a soil berm and absorbent boom.
- Absorbent Oil-Dri was applied in the areas of leaking drums.
- b. OSC and START walked the site with the cleanup contractor (EMCO) and facility representative to confirm location of leaking drums and open containers.
- c. Overpack drums are enroute and will arrive onsite Friday AM (2/3/2012).
- d. OSC notified local Fire Department and Illinois EPA

2/3/2012 Overpacking of Leaking Drums Continues:

- a. Polychem contractor overpacked 52 leaking 55-gallon steel drums, 2 leaking 30-gallon poly drums, and 4 dented/impacted 55-gallon drums.
- b. Polychem contractor spilled a 55-gallon drum containing non-hazardous phenolic resin during overpacking operations. The contractor applied Oil-Dri absorbents to the spill area and scraped into an 85-gallon overpack drum.
- c. Polychem contractor applied additional Oil-Dri in the North drum area.
- d. EPA contractor Weston marked each overpack drum with the drum ID information and sample number as appropriate
- e. EPA OSC and START Identified a group of additional leaking drums in the northeast corner of the property belonging to Polychem. OSC requested that these drums be overpacked.

2/6/2012 Leaking/open containers containing hazardous substance and pollutant releases secured. CERCLA Emergency Response Complete:

- a. Polychem contractor sealed two 330-gal and six 270-gal open or cracked totes containing unknown material with 6mm visqueen wrap, sealed with plastic bands and duct tape.
- b. EPA OSC and Weston contractor identified a new caustic/corrosive spill from a leaking 270-gal tote containing a red liquid with a field pH of ≥ 13 . OSC directed Polychem to secure the leaking drum by transferring it inside their building. Polychem will pump the contents of the leaking tote to a secure tote. Oil-Dri was applied to the spill area and scraped into a 55-gallon drum by the Polychem contractor.
- c. Polychem contractor installed lids on four leaking 55-gallon Polychem drums containing an oily substance in the northeast corner of the Site.
- d. Polychem contractor scraped contaminated Oil-Dri into two 55-gallon drums in the northwest area of the Site where pooled oil and water were observed flowing into a storm sewer.
- e. Polychem contractor installed fresh absorbent boom along the northwest fence line and downgradient from oil contaminated asphalt in the area.
- f. Polychem contractor overpacked one 55-gallon leaking drum containing xylene. START marked the overpack drum with the drum ID information.
- g. Polychem contractor installed lids on 13 open 55-gallon drums.

Note: Leaking and Open containers not secured contained rain water or non-haz solid waste.

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

The leaking drums identified during the site assessment (section 1.1.3) are a release of hazardous substances, pollutants and may present an imminent and substantial endangerment to the public health or welfare or to the environment.

On January 30, 2012 EPA issued a verbal notice under CERCLA to representatives of Polychem and informed them that, unless the facility is able to respond quickly and adequately, the Agency plans to take actions to address the release or threat of release of hazardous substances, pollutants or contaminants, including Benzene and flammable waste at the Site. Polychem responded that they could respond in a timely manner.

On February 1, 2012. EPA OSC and START mobilized to the site to oversee Polychem contractor cleanup operations.

2.1.4 Progress Metrics

In Summary, EPA OSC directed Polychem contractors to complete the following activities to secure the release or potential release of hazardous substances and pollutants:

- Overpacked 60 leaking and or dented/impacted drums which contain hazardous substances, pollutants, flammables, and unknowns.
- Secured One Tote which was leaking caustic/corrosive substances inside building.
- Resecured lids on 17 open drums of unknown material.
- Secured plastic cover on 8 open top totes of unknown material.
- Picked up hazardous substances and pollutants spilled and installed fresh absorbents booms to prevent offsite release.

R5 Priorities Summary		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	0
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Acres Protected	4
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	1000
	Number of workers on site	8

2.2 Planning Section

2.2.1 Anticipated Activities

Continue to work local authorities regarding public health issues.

2.2.1.1 Planned Response Activities

See sections 2.2.1.2 and 2.2.2

2.2.1.2 Next Steps

Additional response actions under RCRA and CERCLA are under discussion at EPA.

2.2.2 Issues

There are hundreds of totes and drums remaining at the site which are suspected to contain thousands of gallons of hazardous substances, pollutants, and flammables. The containers and drums are in poor shape and are going to fail in the next few months. The threat of release from these containers and threat to public health and the environment remains high at this Site.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA contractor Weston provided the health and safety plan onsite.

2.5.2 Liaison Officer

None

2.5.3 Information Officer

None

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

Illinois EPA (notified)
Chicago Heights Fire Department (notified)

4. Personnel On Site

One EPA OSC and One START contractor conducted the Emergency Response oversight in the field.

5. Definition of Terms

RCRA - Resource Conservation and Recovery Act.

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.