

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #7  
Final. Completion of the Cleanup  
Scrub-A-Dubb Barrel Co.  
A6Z3  
Lubbock, TX  
Latitude: 33.6118227 Longitude: -101.8358266

**To:**  
**From:** Greg Fife, OSC  
**Date:** 2/23/2012  
**Reporting Period:** 2/1/2012-2/23/2012

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	A6Z3	<b>Contract Number:</b>	EP-S6-07-01
<b>D.O. Number:</b>	0701-097	<b>Action Memo Date:</b>	9/1/2011
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/29/2011	<b>Start Date:</b>	8/30/2011
<b>Demob Date:</b>	2/23/2012	<b>Completion Date:</b>	2/23/2012
<b>CERCLIS ID:</b>	txd097054878	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Classic Emergency

#### 1.1.2 Site Description

The Scrub-A-Dubb Site (Site) was an inactive drum refurbishing company that began operation in 1975. The site consisted of two tracts of land split by North Ash Avenue; more than 46,000 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 46,000 drums onsite, over 4,600 contained varying volumes of hazardous substances. According to the owner or operators, accepted drums were not always RCRA-empty (40 CFR 261.7) when received.

##### 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.

Latitude: 33.6118227 Longitude: -101.8358266

##### 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**

Crews have demobilized from the Site. During the response action, more than 46,000 drums were recovered and shipped offsite. About 10% of those drums has significant amounts of hazardous substances. Those drums were consolidated into various waste streams and amounted to about 2,300 drums.

Approximately 3,000 cubic yards of contaminated soil was excavated and disposed of off-site.

Six underground storage tanks were removed. Several aboveground tanks were drained, dismantled and disposed of. Containments, settling tanks, and other waste processing structures were removed.

All areas have been backfilled to stable grade.

#### **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.