U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Studer Container Service - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: **POLREP #1**
Final
Studer Container Service
MON000706453
Kansas City, MO
Latitude: 39.1073870 Longitude: -94.5956480

To: Scott Hayes, EPA R7 Superfund
Mary Peterson, SUPR/ERSB/PPSS

From: Tom Mahler, On-Scene Coordinator
Date: 9/12/2012
Reporting Period: July 6, 2012 to July 16, 2012

1. Introduction

1.1 Background

Site Number:	MON000706453	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	7/3/2012
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	7/12/2012	**Start Date:**	7/6/2012
Demob Date:	7/12/2012	**Completion Date:**	7/16/2012
CERCLIS ID:	MON000706453	**RCRIS ID:**	MOR000543819
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

CERCLA incident category: Emergency Response involving several abandoned drums at an active Studer Container Service facility.

1.1.2 Site Description

The Studer Container Service facility (Site) is approximately 800 feet south of the Missouri River in the highly industrial Kansas City West Bottoms area. There is no fence or barrier to keep the public out of the Site. Adjacent to the Site is the Kansas City Community Release Center, located at 651 Mulberry Street, Kansas City, Jackson County, Missouri. This center is run by the Missouri Department of Corrections and has 350 residents on average. During the removal site evaluation, many people were observed attempting to walk through the Site as they made their way from the work release center to Woodswether Road, which is a major thoroughfare that runs through the area, and where public transportation is available.

1.1.2.1 Location

The Site is located at 520 Madison Avenue in Kansas City, Jackson County, Missouri. Lat/Long: N 39.107046 / W -94.595306

1.1.2.2 Description of Threat

On April 10-11, 2012, the U.S. Environmental Protection Agency (EPA) performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection at the Site. Several containers of what appeared to be waste were identified as requiring a hazardous waste determination. The property owner claimed that these items had been abandoned on the Site without his knowledge or consent. These items include twenty-six 55-gallon drums and six pallets of other smaller containers. The Site was referred by the EPA's Air and Waste Management Division to the EPA's Superfund Division after the inspection.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On June 28, 2012, during a removal site evaluation conducted by the EPA's Superfund Program, field screening of the contents of the drums and other containers was conducted. Many of these drums did not

have intact lids and are more likely to release their contents due to rain or expansion from high ambient outdoor temperatures greater than 90ºF. In addition, high volatile organic compound (VOC) readings were detected in several of the drums and smaller containers. These items are also likely to release due to pressure buildup in the drum or container. During the evaluation, the EPA sampling team observed a lid from a smaller container pop off due to internal vapor pressure from the excessive heat. Several of the drums and containers appeared to contain similar waste. A representative subset of these containers was field screened. Field screening indicated the presence of RCRA hazardous wastes as defined by Section 3001 of RCRA and 40 CFR 261.3. Accordingly, these wastes are CERCLA hazardous substances as defined by Section 101(14) of CERCLA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On Thursday, June 28, 2012, EPA On-Scene Coordinators (OSCs) Dave Williams and Tom Mahler arrived at the Site along with two EPA contractors, Keith Brown and Adam Watkins, to conduct a removal site evaluation. In all, 26 drums (55-gallon capacity) and other various smaller containers were identified at the Site. Each drum was assigned an identifier (D-01, D-02, etc.), and the small containers were grouped together by the pallet on which they were found (P-1, P-2, etc.). All relevant information - including container type/size and product label information (if available) - was recorded on Container Inventory Sheets.

The EPA and START personnel opened all of the 55-gallon drums and several other small containers abandoned at the Site to monitor their headspace for volatile organic compounds (VOC) with a photo-ionization detector (PID). High VOC readings were detected in several of the drums. In addition, each container was screened for radioactive material with a MicroR radiation survey meter. None of the containers exhibited radiation concentrations above background levels of approximately 9 microR/hour (µR/hr). Next, representative samples were collected from each of the 55-gallon drums. Several of the smaller containers were also chosen by OSC Williams for sampling. Throughout the sampling process, breathing zones were monitored with the PID. All instrument readings and observable waste characteristics were recorded on Container Inventory Sheets (see Appendix C).

Following sampling activities, nine drum and four small container samples were chosen by the EPA for further field screening and HazMat ID field analysis. The EPA personnel conducted screening activities on-site in an emergency response vehicle. Field screening included tests for various properties including explosives, air reactivity, water reactivity, water solubility, corrosivity, oxidation, and flammability. The field screening results indicated the presence of characteristic ignitable waste in several of the samples. The EPA personnel determined that enough information had been gathered regarding container contents to begin a removal action instead of collecting and sending samples to an off-site laboratory for further analysis.

2.1.2 Response Actions to Date

On Friday, July 6, 2012, EPA contractor Chuck Jackson with Environmental Restoration and OSCs Dave Williams and Tom Mahler performed a site walk to finalize plans for the removal action. The EPA and ERRS contractor returned to the site on Thursday, July 12, 2012 to perform the removal.

Environmental Restoration hired PSC, a disposal company, to remove the drums and containers. EPA OSC Tom Mahler provided contractor oversite. During the removal action, PSC overpacked and labeled the 26 drums for transportation to their facility for further evaluation and pending disposal. PSC also separated and sorted the smaller containers into various hazard categories including oxidizing liquids, organic peroxides, flammable corrosive liquids, and basic corrosive liquids.

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

Studer Container Service is the property owner for the Site, but the Criminal Investigation Division of the EPA is the lead for any further enforcement activity.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Waste Paint	Liquid	4020lbs	1	Fuel Blending	Solvent Recovery, LLC
Waste Paint	Liquid	315lbs	2	Fuel Blending	Solvent Recovery, LLC
Floordry/Antifreeze	Liquid	2700lbs	5	Fuel Blending	Solvent Recovery, LLC
UN3267 (Corrosive Liquid)	Liquid	48lbs	7	None	Solvent Recovery, LLC
Waste Paint	Liquid	3200lbs	9	Fuel Blending	Solvent Recovery, LLC
UN3080 (Isocyanates)	Liquid	26lbs	10	None	Solvent Recovery, LLC

UN3099 (Oxidizing Liquid)	Liquid	11lbs	11	None	Solvent Recovery, LLC
UN3105 (Organic Peroxide)	Liquid	6lbs	12	None	Solvent Recovery, LLC
UN2920 (Corrosive Liquid)	Liquid	65lbs	13	None	Solvent Recovery, LLC
UN3266 (Corrosive Liquid)	Liquid	36lbs	14	None	Solvent Recovery, LLC

2.2 Planning Section

2.2.1 Anticipated Activities

No additional response activities are planned at this time.

2.2.1.1 Planned Response Activities

No additional response activities are planned at this time.

2.2.1.2 Next Steps

N/A.

2.2.2 Issues

There are no outstanding issues.

2.3 Logistics Section

The scope of this action did not require a separate logistics section. No logistical issues were encountered during this response.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Due to the small scale of this removal action, there was no need for any additional health and safety support.

2.5.2 Liaison Officer

Due to the small scale of this removal action, there was no need for a liaison officer.

2.5.3 Information Officer

Due to the small scale of this removal action, there was no need for an information officer.

3. Participating Entities

3.1 Unified Command

Due to the small scale of this removal action, there was no need to set up a unified command structure.

3.2 Cooperating Agencies

The response was conducted entirely by the EPA.

4. Personnel On Site

At the time the removal action was taken, Tom Mahler (On-Scene Coordinator with EPA Region 7) and Chuck Jackson (Removal Manager with Environmental Restoration) provided oversite while two PSC contractors sorted and packed the wastes for offsite treatment and disposal. All personnel and equipment were demobilized from the site on July 12, 2012.

5. Definition of Terms

N/A.

6. Additional sources of information

6.1 Internet location of additional information/report

epaosc.org/StuderContainerService

6.2 Reporting Schedule

This Pollution Report will serve at the first and final report for the Site.

7. Situational Reference Materials

N/A