U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Hemlock Street Battery Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject:	**POLREP #2** **TECO Commences Removal Action** **Hemlock Street Battery Site** **B4E8** **Tampa, FL** **Latitude: 27.9377824 Longitude: -82.4376082**
To:	Jim Webster, USEPA R4 ERRB
From:	Chuck Berry, On Scene Coordinator
Date:	4/29/2013
Reporting Period:	April 15, 2013 - May 3, 2013

1. Introduction

1.1 Background

Site Number:	B4E8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Assessment
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/17/2009	**Start Date:**	9/1/2009
Demob Date:	11/20/2009	**Completion Date:**	
CERCLIS ID:	FLN000410641	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

Hemlock Street Battery Site (the Site) abuts the former Musselman Steel Corporation, formerly Musselman Steel Fabricators, Inc. (Musselman Steel). The site is currently owned by TECO Energy, a local utility corporation, and is part of their overhead transmission lines.

The area around the site is a mix of heavy industrial/commercial industries of Tampa which has extensive rail yards, port terminals, and above ground storage tank (AST) farms. Homes are located approximately 300 feet northeast of the Site, but a group of homeless men live directly next to the site, in a dilapidated corrugated tin shack.

1.1.2.1 Location

The Site is located at 1710 South 20th Street in Tampa, Hillsborough County, Florida. The Site is located on Hookers Point, a peninsula bound by McKay Bay to the east, Sparkman Channel to the west, and Hillsborough Bay to the south.

1.1.2.2 Description of Threat

The site is covered with a layer of lead-contaminated soil and debris from an illicit battery-cracking operation. The majority of contaminated soil remains within a poorly maintained fenced area with at least one observed breach that could be accessed by trespassers who may become exposed to the soil. Anyone entering the Site may be exposed via inhalation of airborne dust, inadvertent ingestion of contaminated soil, and direct contact with the contaminated surface soils. Off-site migration of lead via erosion or airborne dust may lead to the exposure of nearby residents.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In April 1992, the Environmental Protection Commission of Hillborough County (EPC) received an anonymous complaint regarding the Musselman Steel Site. During an investigation by EPC, large amounts of solid waste including empty drums and crushed battery casings were observed throughout Site. These battery casings extended onto the TECO-owned property.

During the week of November 17, 2009, the United States Environmental Protection Agency (EPA) Region 4 On-Scene Coordinator (OSC) and Superfund Technical Assessment and Response Team

(START) began a Removal Site Evaluation (RSE) of Hemlock Street Battery Site. All activities were undertaken pursuant to Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The purpose of the RSE was to delineate previously identified lead and arsenic contamination in the soil. A portable x-ray fluorescence (XRF) instrument was employed during field screening down to a maximum depth of 12 inches below ground surface (bgs).

Soil was screened for lead and arsenic at a total of 22 (11 surface and 11 subsurface) locations from 2 grids. Four samples were submitted to a laboratory for XRF confirmation purposes.

Confirmatory laboratory results for lead ranged from 2,250 mg/kg to 23,100 mg/kg. Analytical results for lead exceeded EPA's industrial/commercial removal action level (RAL) for lead of 2,000 mg/kg.

Confirmatory laboratory analytical results for arsenic ranged from 3.5 mg/kg to 18.8 mg/kg. The analytical results for arsenic did not exceed EPA's industrial/commercial removal action level (RAL) for arsenic of 177 mg/kg.

In 2010, EPA initiated a fund-lead CERCLA removal action on the Musselman Steel property. However, the TECO property was not included in the scope of the fund-lead removal.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On April 15, TECO mobilized Envirotek (construction crew) and ECT (technical consultant) to the site to remove soil with lead levels greater than 1,400 milligrams per kilogram (mg/kg). Envirotek's first task was to remove the debris scattered throughout the site. Envirotek used an excavator and skid-steer to remove and carry debris to several piles. Envirtex also built a containment area for mixing amendment with contaminated soil. After viewing the site set up, OSC Berry requested ECT place dust monitors at the east and north fence-lines, where the property abuts neighboring active parcels.

During the week of April 22, Envirotek excavated 2 cells, B3 and C3 and treated with stabilizing agent. The excavation depth ranged from 1 to 1.5 feet below the approximate ground surface. Lead levels in the exposed soil were 111 and 506 mg/kg based on XRF readings of 5-point confirmation samples. During debris segregation, Envirotex spoke with the disposal facility and realized that segregation of attached soil particles was needed. A rotating screen was brought on site to further separated the soil from the debris. The segregated debris will be disposed of separately from the soil. During debris removal and segregation, it was noted that the large amount of debris actually constituted a considerable volume and removal altered the the original ground surface. It was agreed that any removal to a certain depth would be based on the soil level after debris removal

During the week of April 29, crews completed debris segregation. Approximately 400 cubic yards of debris were generated, and the parts heavily laden with battery chips were set aside for intensive treatment prior to sampling for off-site disposal. Currently, the piles have been sampled, and Envirotek is awaiting sample results.

Due to the spreading of contamination by heavy equipment tracking across the site and by heavy rains turning the site very muddy, Envirtex and TECO realized the original cells used to delineate the site were no longer representative. TECO opted to begin using the XRF to guide the excavation in real time instead of performing excavation on a cell-by-cell basis. Envirotek began excavation in the southwestern corner of the site, and removed approximately 600 cubic yards of material. To date, Envirotex has excavated 800 cubic years of soil and segregated another 200 yards of soil through screening. Approximately 400 cubic yards of debris is stored on site.

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

TECO has been identified as a PRP based on their ownership of the property. It is not believed TECO caused the contamination to be released. TECO signed an AOC in 2012, and has agreed to perform the removal action. Under the terms of the AOC, TECO will remove lead-contaminated soil from the property until the levels are below 1,400 mg/kg or a total excavated depth of 2 feet bgs has been achieved. Any areas with lead levels above 1,400 mg/kg at the 2-foot bgs level will be covered with 2 feet of clean backfill.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

TECO's contractors will continue to screen debris. Based on the amount of soil movement that has occurred with the debris removal, TECO has decided to begin by scraping a uniform 6 inches of soil from the entire site. TECO has also agreed to dig past the 2-foot depth where battery chips or casings are present, on a case-by-case basis, as these areas are identified. Once the 6-inches is removed, XRF will be used to guide deeper excavation down to the 2-foot limit.

2.2.1.2 Next Steps

- Perform uniform 6-inch scrape of the entire site
- Remove contaminated soil to below 1,400 mg/kg or until 2 feet bgs is achieved
- Treat excavated soil
- Sample stockpiles and re-treat, if necessary
- Dispose of treated soil at Subtitle D landfill
- Backfill areas with >1,400 mg/kg lead with at least 2 feet of clean fill.

2.2.2 Issues

TECO's surveyors identified two swaths of property on the north and south sides of the lot that were identified as City of Tampa property for a planned street (at one time the area was planned for a residential subdivision). There was some confusion as to the actual ownership of the property, with the City claiming TECO still owns the land and TECO unsure of it's legal obligation and authority to perform the removal action. EPA's lawyers worked with TECO and City officials to resolve the issue. TECO has assumed control of the 25-foot section to the south and has agreed to excavate the entire 10-foot area to the north under its access agreement with the current property owner.

During the week of April 29, the site experienced rain nearly every day. One low section is storing water on site, and more rain is expected over the next few days. The mud is making site operations messy, and it has increased the need for proper hygiene practices. At the OSC's direction, TECO and it's contractors have begun taking greater industrial hygiene practices to minimize the exposure, including the use of PPE, specifically using boot covers or 'hot-zone specific' boots. However, the rain is suppressing the dust.

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

2.5.1 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

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.