U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Kokomo Dump - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial PolRep
Kokomo Dump
C564
Kokomo, IN
Latitude: 40.4770000 Longitude: -86.1650000

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From: Shelly Lam, On-Scene Coordinator
Date: 9/4/2013
Reporting Period: August 5-30, 2013

1. Introduction

1.1 Background

Site Number:	C564	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/13/2012
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:		**Start Date:**	8/5/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	INN000510728	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) incident category: Waste Management - Co-disposal landfill (municipal and industrial)

1.1.2 Site Description

The Kokomo Dump Site is 4.54 acres in size, and contains one small building. The City of Kokomo owns the property, which is currently operated by Howard County as a yard waste recycling center. The City operated a municipal landfill at the site from approximately 1963 to the 1970s. Landfill operations included running a large incinerator until the late 1960s.

1.1.2.1 Location

The Kokomo Dump Site is located at 1130 S. Dixon Road in Kokomo, Howard County, Indiana, 46901. The geographical coordinates for the site are latitude

40.477° north and longitude 86.165° west.

The area around the site is mixed use, including residential, commercial, and industrial properties. The site is bounded by a metal recycling facility to the north; a railroad and Haynes International to the east; residential properties to the south; and Dixon Road to the west. Wildcat Creek is approximately 500 feet from the northern boundary of the site.

1.1.2.2 Description of Threat
The Site Assessment documented hazardous substances in surface soil/waste piles, subsurface soil, and leaking from drums into a small creek, which drains into Wildcat Creek. Hazardous substances, as defined by Section 101(14) of CERCLA, include lead, arsenic, and polychlorinated biphenyls (PCB).

The facility is currently operated as a yard waste recycling center, and is open to the public. Additionally, the facility is not fenced completely along the southern, western, and northern property boundaries, potentially allowing access to trespassers. The Environmental Protection Agency's (EPA) On-Scene Coordinator (OSC) observed that one of the drums was close to a child's swing set on a neighboring residential property.

Release mechanisms from these sources include fugitive dust generation from soil or waste to air; contaminated surface soil or waste runoff and overland flow to surface water, in particular Wildcat Creek; leaching of surface and buried waste to groundwater and deeper soils; and tracking of contaminated surface soil or waste. Possible exposure routes for hazardous substances include dermal contact with contaminated soil or waste; inhalation or accidental ingestion of fugitive dust; and direct contact with potentially-impacted surface water or sediment in the on-site creek or Wildcat Creek. Potential human receptors include current and future site workers, site visitors, trespassers at the site, recreational users of Wildcat Creek, and nearby residents.

1.1.3 Preliminary Removal
The OSC and the Superfund Technical Assessment and Response Team (START) contractor conducted a Site Assessment on August 19, 2011. Site Assessment activities included drum, surface and subsurface soil sampling.

EPA documented drums exposed in the creek bank and lying on the ground surface. The drums contents were colorful and resembled paint. The drums were in poor condition and leaking their contents. EPA collected three samples from leaking drums and surface soil for total and Toxicity Characteristic Leachate Procedure (TCLP) metals analysis. Analytical results were compared to regional screening levels (RSL) for industrial soil and regulatory limits for toxicity established in the Resource Conservation and Recovery Act (RCRA), 40 Code of Federal Regulations (CFR) § 261.24. Drum and surface soil sample results indicated:

- Two drum samples exceeded the industrial RSL for arsenic of 1.6 milligrams per kilogram (mg/kg) at a maximum concentration of 57.9 mg/kg;
- One drum sample and the surface soil sample exceeded the industrial RSL for lead of 800 mg/kg at a maximum concentration of 16,100 mg/kg; and
- The surface soil sample exceeded the lead TCLP limit for lead of 5 milligrams per liter (mg/L) at a concentration of 8.35 mg/L.

Seven subsurface soil samples were collected to determine if material leaking from the drums had migrated. Samples were analyzed for total and TCLP metals, semi-volatile organic compounds (SVOC), total and TCLP volatile organic compounds (VOC), and PCBs. Results were compared to industrial RSLs and regulatory limits for toxicity. Subsurface soil sample results indicated:

- Arsenic was above the industrial RSL of 1.6 mg/kg in 6 of 7 samples with a maximum concentration of 39.8 mg/kg at a depth from 6 to 8 feet;
- Lead exceeded the RSL of 800 mg/kg in 3 of 7 samples at a maximum concentration of 1,500 mg/kg at a depth from 6 to 8 feet; and
- In two samples collected at depths of 3 to 4 feet, PCBs exceeded the industrial RSL of 740 ug/kg in two samples at maximum concentrations of 5,200 and 1,500 micrograms per kilogram (ug/kg), for Aroclor-1248 and Aroclor-1254 respectively, at a depth of 3 to 4 feet.

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2. Current Activities

2.1 Operations Section

2.1.1 Narrative
EPA executed an Administrative Settlement Agreement and Order on Consent (ASAOC) on August 5, 2013, pursuant to Sections 104, 106(a), 107 and 122 of CERCLA, as amended, 42 U.S. Code (USC) §§ 9604, 9606(a), 9607 and 9622. Work to be performed under the ASAOC includes:

- Developing and implementing site plans including a site-specific Health and Safety Plan (HASP), a Quality Assurance Project Plan (QAPP), a Site Emergency Contingency Plan, and a Work Plan;
- Establishing site security;
- Determining the extent of buried drums and contamination in soil;
- Developing and implementing a plan to control, contain, and/or remove drums and highly contaminated soil;
- Performing sampling and analysis to determine disposal options;
- Providing EPA with notice of sampling events five (5) business days in advance of the sampling so that EPA can conduct oversight and split samples; and
- Consolidating and packaging hazardous substances, pollutants and contaminants for transportation and off-site disposal in accordance with the EPA Off-Site Rule, 40 CFR § 300.440.

2.1.2 Response Actions to Date
The City retained a contractor to perform the work and notified EPA of the name and qualifications of the contractor and the project coordinator. Additionally, the City's contractor obtained off-site access to Winamac Southern Railroad, located directly east of the site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
EPA executed Docket No. V-W-13 C-018 on August 5, 2013 with the City of Kokomo as the Respondent.

2.1.4 Progress Metrics
Below is a summary of waste transported off-site.

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

Below is a schedule of milestone per the ASAOC.

Order #	Milestone	# Days	Date Due	Date Done	Reference
89	Effective Date (ED)	ED	8/5/2013		
16b	Site Security				
12	Contractor Notification, including Quality Management Plan	ED+5 bd	8/12/2013	8/9/2013	
13	Project Coordinator Notification	ED+5 bd	8/12/2013	8/9/2013	
18	HASP	ED+30 cd	9/4/2013		EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414)
17a	Work Plan, including QAPP	ED+30 cd	9/4/2013		Generic PRP Work Plan, QA/R-5
17b	Work Plan Revisions	7 bd			
16c	Field Investigation				
16f	Removal				
22	Final Report, 60 days after removal is complete	60 cd			
16e	Sampling Notification to EPA, 5 days prior	5 bd			
21a	Progress Reports, 30th of every month				Monthly Progress Report

2.2 Planning Section

2.2.1 Anticipated Activities

The following sections discuss planned response activities and next steps.

2.2.1.1 Planned Response Activities

The City should submit a work plan, QAPP, and HASP on September 4th in accordance with the ASAOC.

2.2.1.2 Next Steps

Upon receipt of the work plan, EPA will review it and provide comments to the City. Once EPA approves the work plan, field work will commence in accordance with the schedule outlined in the work plan.

2.2.2 Issues

None

2.3 Logistics Section

Not applicable (NA)

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Pending

2.5.2 Liaison Officer

NA

2.5.3 Information Officer

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

EPA will coordinate activities with the Indiana Department of Environmental Management (IDEM) and the Howard County Health Department.

4. Personnel On Site

None

5. Definition of Terms

µg/kg	micrograms per kilogram
ASAOC	Administrative Settlement Agreement and Order on Consent
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NA	Not Applicable

OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PolRep	Pollution Report
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Levels
START	Superfund Technical Assessment and Response Team
SVOC	Semi-Volatile Organic Compounds
TCLP	Toxicity Characteristic Leachate Procedure
USC	U.S. Code
VOC	Volatile Organic Compounds

6. Additional sources of information

6.1 Internet location of additional information/report
Additional information is posted to www.epaosc.org/kokomodump.

6.2 Reporting Schedule
Pollution Reports (PolRep) will be submitted monthly.

7. Situational Reference Materials

NA