

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Black Leaf Chemical - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #5
Progress Polrep
Black Leaf Chemical
B4L7
Louisville, KY
Latitude: 38.2318091 Longitude: -85.7827199

To:
From: Art Smith, On-Scene Coordinator
Date: 9/16/2013
Reporting Period: 9/9/2013 through 9/13/2013

1. Introduction

1.1 Background

Site Number:	B4L7	Contract Number:	
D.O. Number:		Action Memo Date:	8/23/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/23/2011	Start Date:	9/23/2011
Demob Date:		Completion Date:	
CERCLIS ID:	KYD980559250	RCRIS ID:	
ERNS No.:		State Notification:	08/29/2011
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Site is located on a portion of a 29-acre parcel of land at 1391 Dixie Highway in the Park Hill neighborhood of Louisville. The 29-acre parcel is bordered by a densely populated residential area to the north, a large rail yard to the south, and industrial/commercial areas to the east and west. Multiple brick structures occupy the Site, which was the location of a pesticide formulating operation, a whiskey distillery, and several wood drying and lumber distribution companies in the past. The Site is currently abandoned.

The Site comprises the areal extent of contamination, which includes the 29-acre industrial park, the public right of ways to the north of the facility and the following residential properties to the north of the facility:

1532 Wilson Avenue
1612 Wilson Avenue
1616 Wilson Avenue
1620 Wilson Avenue
1624 Wilson Avenue
1632 Wilson Avenue
1728 Wilson Avenue
1732 Wilson Avenue
1748 St. Louis Avenue
1752 St. Louis Avenue

1.1.2.2 Description of Threat

On July 25, 2011, the Kentucky Department for Environmental Protection (KDEP) Superfund Branch requested that the U.S. Environmental Protection Agency Region 4 evaluate this Site for purposes of conducting a time-critical removal action. The request was based on the results of an October 2010 Site Investigation (SI) that revealed high concentrations of organochlorine pesticides in surface soil at an industrial park. KDEP also cited the lack of controls on access to the Site and the inability to compel the current property owner to secure the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On August 8, 2011, On-Scene Coordinator (OSC) Smith and KDEP performed a site inspection. At that

time, a gate at the 17th Street entrance to the Site was missing and evidence of trespassing was noted in areas of the Site where hazardous substance releases are present. Based on this information, the OSC completed the removal site evaluation under 40 CFR Section 300.410, and concluded that the Site meets the National Contingency Plan (NCP) criteria for a time-critical removal action. On September 13, 2011, the EPA initiated a time-critical removal action to repair the fence and secure the Site to protect the public from potential direct contact with hazardous substances.

In September and October 2011, the EPA collected soil samples on-site in a storm drain and at multiple locations just outside the fence along the perimeter of the Site to determine whether hazardous substances had migrated to off-site areas. Analytical results indicated that arsenic, lead, and organochlorine pesticides which were released at the Site have migrated off-site into the public sewer system and the public right of ways.

In February 2012, the EPA collected soil samples at 50 residential properties located in close proximity to the Site. In November 2012, both the EPA and the Kentucky Department for Environmental Protection collected soil samples at 19 additional residential properties. Analytical results indicated that arsenic, lead, organochlorine pesticides and polycyclic aromatic hydrocarbons (PAHs) which were released at the Site have migrated to nearby residential properties. In particular, arsenic, benzo(a)pyrene, and lead are at concentrations which exceed the EPA's Removal Management Levels (RML) for residential areas.

In June 2013, an Action Memorandum was signed authorizing \$312,600 in funding for EPA to conduct a time-critical removal action at the 10 residential lots where EPA's RMLs are exceeded.

In September 2013, a Ceiling Increase Action Memorandum was signed authorizing an additional \$396,150 in funding in order to complete the removal action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

During the week of September 9, work focused on the soil removal at 1612 Wilson Avenue. Soil was excavated to a depth of 1 foot below land surface (BLS), except in areas where gardening occurs. In these areas, soil was excavated to 2 feet BLS in accordance with guidance found in EPA's "Superfund Lead-Contaminated Residential Sites Handbook" (OSWER Publication No. 9285-7.50, August 2003). By September 13, approximately 160 cubic yards of soil was removed, and the lot was backfilled with clean fill. A parking area was restored with a 6" compacted lift of dense grade aggregate.

Also during the week of September ERRS contractor CMC, Inc., retained the services of Air Source Technology to perform air sampling activities. A total of 6 air samples were collected in and around the vicinity of the soil removal at 1612 Wilson Avenue. The results indicate that the presence of lead particles was not detected at the quantitation limit of 1.9 micrograms per cubic meter (ug/m3) of air.

From August 20 through September 13, EPA START contractor OTIE conducted periodic monitoring for airborne particulate matter potentially associated with soil excavation. The results are in ug/m3 and are as follows:

Black Leaf Removal Action Time Weighted Averages		
Run Date	Data Ram Linc 202	Data Ram Linc 32
8/20/2013	22.39	17.96
8/21/2013	27.28	32.69
8/22/2013	24.39	31.18
8/26/2013	38.19	57.6
8/27/2013	37.11	42.45
8/28/2013	26.95	24.55
8/29/2013	43.25	36.51
9/10/2013	46.00	39.23
9/11/2013	45.69	41.91
9/12/2013	45.54	36.08
9/13/2013	14.15	4.27

The goal is to keep daily average readings to less than 125 ug/m3. This action level correlates to an estimated fraction of total dust that are lead particles and is designed to comply with the National Ambient Air Quality Standard for lead dust = 0.15 ug/m3. This action level was derived and is based on a lead level in soil of 1200 milligrams per kilogram (mg/kg) or 0.12% of total particulate matter. The assumed source soil lead concentration of 1200 mg/kg is the maximum value found in residential soil samples and was only detected in one lot. (The average lead concentration in soil is about 270 mg/kg). Therefore, the selected particulate action level of 125 ug/m3 is highly conservative and protective of human health.

By observation, the total dust levels measured during this period are documented to be on average about 2 to 4 times lower than the 125 ug/m3 action level for total dust in air. This documents that the dust suppression tactics to support soil excavation remain effective. As a result, the OSC has discontinued particulate monitoring effective September 16. Additional air monitoring and/or air sampling will be

considered if conditions change (e.g., a prolonged period of hot, dry weather).

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

Several PRPs for this Site have been identified, and the process of identifying PRPs for this Site is nearly complete. Of the viable PRPs identified for the Site thus far, there is no expressed commitment to undertaking the necessary response actions. Based on a lack of PRP participation, it is necessary to proceed with a fund-lead removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>		<i>Quantity</i>		<i>Disposal</i>
Soil contaminated with lead, organochlorine pesticides and PAHs		288 tons		Outer Loop Landfill, Louisville, KY

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Complete final grading and placement of sod at 1612 Wilson. Begin soil excavation at 1616 Wilson.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

NA

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Kentucky Department for Environmental Protection
Louisville Metro Public Works

4. Personnel On Site

EPA Region 4 - 1
START - 1

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

Polreps will be submitted on a weekly basis

7. Situational Reference Materials

No information available at this time.