

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
Progress PolRep  
Kokomo Dump  
C564  
Kokomo, IN  
Latitude: 40.4770000 Longitude: -86.1650000

**To:**  
**From:** Shelly Lam, On-Scene Coordinator  
**Date:** 11/26/2013  
**Reporting Period:** September 1 - October 31, 2013

**1. Introduction**

**1.1 Background**

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

**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 high levels of lead, arsenic, and PCBs. Refer to Pollution Report (PolRep) #1 for additional information.

## 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 Code of Federal Regulations (CFR) § 300.440.

#### 2.1.2 Response Actions to Date

On September 4, 2013, the consultant for the City of Kokomo submitted a Work Plan, HASP, and QAPP. EPA disapproved the Work Plan, HASP, and QAPP. There was a substantial lack of detail with regards to specific removal actions. Additionally, the documents failed to adequately address the work to be performed outlined in Section VIII of the ASAOC. EPA required that the City of Kokomo resubmit the documents to comply with the ASAOC and to be consistent with EPA guidance documents. Revised documents were resubmitted on October 25, 2013.

#### 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.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Pending					

Below is a schedule of milestones per the ASAOC.

<b>Order #</b>	<b>Milestone</b>	<b>Date Due</b>	<b>Date Done</b>
89	Effective Date	8/5/2013	8/5/2013
16b	Establish site security		
12	Contractor Notification, including Quality Management Plan	8/12/2013	8/9/2013
13	Project Coordinator Notification	8/12/2013	8/9/2013
18	HASP	9/4/2013	9/4/2013
17a	Work Plan, including QAPP	9/4/2013	9/4/2013
17b	Work Plan Revisions	10/27/2013	10/27/2013
	Work Plan Approval		
16c	Field Investigation		
	Site boundary survey		
	Phase I environmental site assessment		
	Brush clearance		
	Utility clearance		
	Surface drum removal		
	Geophysical survey		
	Surface and subsurface soil sampling		
	Test pit excavations		
16f	Removal		
22	Final Report, 60 days after removal is complete		
16e	Sampling Notification to EPA, 5 days prior		
21a	Progress Reports, 30th of every month		

## 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

EPA will review and provide comments on the revised Work Plan, HASP, and QAPP.

#### **2.2.1.2 Next Steps**

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**

ASAO	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
NA	Not Applicable
OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PolRep	Pollution Report
PRP	Potentially Responsible Party
QAPP	Quality Assurance Project Plan
START	Superfund Technical Assessment and Response Team
USC	U.S. Code

### **6. Additional sources of information**

#### **6.1 Internet location of additional information/report**

Additional information is posted to [www.epaosc.org/kokomodump](http://www.epaosc.org/kokomodump).

#### **6.2 Reporting Schedule**

PolReps will be submitted monthly.

### **7. Situational Reference Materials**

NA