

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Industrial Plastics Co Fire - Removal Polrep  
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initial and Final POLREP  
Industrial Plastics Co Fire  
04X6  
Lyles, TN  
Latitude: 35.9025718 Longitude: -87.3530464

**To:** Andy Binford, TDEC

**From:** Steve Spurlin, On-Scene Coordinator, Kevin Eichinger On-Scene Coordinator

**Date:** 12/19/2013

**Reporting Period:** 12/18/2013 - 12/20/2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	04X6	<b>Contract Number:</b>	EP-S4-07-02
<b>D.O. Number:</b>	0124	<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	12/18/2013	<b>Start Date:</b>	12/18/2013
<b>Demob Date:</b>	12/20/2103	<b>Completion Date:</b>	12/20/2013
<b>CERCLIS ID:</b>	TND980844781	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	1068900	<b>State Notification:</b>	12/18/2013
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

CERCLA Emergency Response

#### 1.1.2 Site Description

Industrial Plastics Recycling, a small-scale recycling facility, conducts metals and plastics recycling, storage of waste products, and other related activities on the southern portion of the former Wrigley Charcoal Plant Superfund Site. Wrigley Charcoal was placed on the National Priorities List (NPL) in 1989. The Wrigley Charcoal Site is 35 acres. Industrial Plastics is located on approximately 15 acres of the Superfund Site and consists of a large warehouse, a large processing building and approximately 5 acres of outside/uncovered storage of processed and unprocessed acrylic, poly-carbonate, ABS, polyethylene, polypropylene, styrene, PVC and PETG plastics in totes and piles. The site is surround by residential communities and directly adjacent to the North Fork of Mill Creek.

##### 1.1.2.1 Location

The site address is 8526 Plant Road, Hickman County, Lyles, TN. The site is located northwest of Highway 100, west of Wrigley, about 45 miles southwest of Nashville.

##### 1.1.2.2 Description of Threat

Burning plastics can produce a variety of hazardous substances, including hydrogen chloride, styrene, phosgene, and various volatile and semi-volatile chemicals. The hazardous substances and irritant particulate material can be present in the smoke plume which threatens responders, on-site workers, and the public health of off-site residents in the path of the plume.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A facility that accumulates and recycles various types of plastics caught fire on December 18, 2013. Local Fire and Emergency Crews responded and attempted to extinguish the fire. The fire quickly exceeded the capacity of the local fire crews and additional mutual aid resources responded for assistance. Approximately 5 acres of plastics and surrounding buildings were involved and on fire. A large smoke plume ensued that extended for miles downwind. Numerous homes and business were impact by the smoke

plume. State and Local Official implemented a 1 1/2 mile evacuation zone in all directions. Approximately 500 people were impact by the evacuation. Concerns of water runoff into an adjacent creek (North Fork of Mill Creek) and compromised liquid propane cylinders cause the fire crew to cease fire extinguishment operations and withdraw to a safe distance approximately 1 mile up wind. OSC Spurlin met with the Local and State Emergency responders and determined that EPA assistance was needed for responder and community air monitoring and for fire extinguishment.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

On December 18, 2013, OSC Spurlin received a call from Region 4 Remedial Branch Staff who were on-site for a meeting to discuss the remedy at this NPL Site. The RPM and RPM Manager observed an active fire on a portion of the site and notified ERRB. The burning plastic was difficult to extinguish using water, and the local fire crews did not have resources to address the continuing problem. The fire continued to generate a large smoke plume which was migrating into a nearby neighborhood and the surrounding town. OSC Spurlin and OSC Eichinger mobilize to the Site to evaluate the conditions.

#### **2.1.2 Response Actions to Date**

December 18, 2013

OSC Spurlin arrived on-site at approximately 1500 hours. Large piles of burning plastic were observed across several acres of the property. Fires still burned inside collapsed buildings. OSC Spurlin observed a large, dark smoke plume migrating from the Site into nearby neighborhoods. Upon arrival, the OSC was requested to join Unified Command and to assist in combating the fire and protecting public health. A 1.5 mile evacuation zone all directions had been established and 4 mile down wind shelter in place advisory has been implemented. Local Schools closed for the day. Unified Command was included multiple local, county, and state government agencies. After further consult with Unified Command, OSC Spurlin was requested to provide heavy equipment to assist with firefighting actions.

OSC met with the property owner on-scene and discussed the needed response and received verbal access. OSC Spurlin explained the scope of the effort likely needed to address problem to the Industrial Plastics representative. Industrial Plastics declined to undertake the action. The owner notified the OSC that he was unable to provide requested support, i.e. the heavy equipment.

OSC Spurlin mobilized and tasked Emergency Response and Removal Services (ERRS) Contractor CMC to respond with labor and equipment to mitigate and extinguish fire.

OSC Spurlin mobilized Superfund Technical Assistance Response Team contractor Tetrattech to conduct work zone, perimeter, and community monitoring of particulate and chemicals associated with burning plastics.

OSC Eichinger arrived on-site at approximately 1700 hours. OSC Spulin tasked OSC Eichinger with the coordination of EPA air monitoring and fire extinguishment operations.

A CMC representative arrived on scene at approximately 2200 hours. The fire continued to burn. Due to initial concerns of flame impingement on multiple large (1,000 gallon) propane tanks within the burning building responders retreated to safer positions. START, local Fire Dept, and ERRS made a modified level B entry to determine plan of action when ERRS equipment arrives at midnight. During the entry it was determined that the fire did not pose a risk to the propane tanks.

START is deployed air monitoring equipment and viper system within the surrounding residential areas and at the fire scene. TetraTech utilized AreaRae's with chlorine, carbon monoxide, oxygen, PID and explosive gas sensors, Dataram Particulate Monitors and Phosgene Monitors to monitor smoke plume. A fixed air monitoring station was established at the fire scene for emergency responder protection and a fixed air monitoring station was established in the 6700 block of Pilot Road at a municipal drinking water tower. Low levels of hazardous substances were picked-up near the fire and particulate levels were elevated downwind of the facility.

CMC mobilized 5 personnel, an equipment trailer, two tracked excavators and a bulldozer. Arrangements were made to access a local borrow pit for clean soil.

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Shortly after midnight, ERRS began addressing the burning material by segregating non-burning material and using imported soil to cover and smother the fire. Approximately 800 tons of clean soil was brought in from an off-site facility.

OSC Stilman mobilized and arrived on scene at approximately 0700 hours.

At approximately 0800 hours, OSC Spurlin met with the Facility Representative and explained that Industrial Products may be liable for any costs EPA incurs. A Notice of Federal Interest was issued. A signed access agreement was also obtained.

By 1600, the fire was 95% contained. Small hot spots and smoldering fires remain inside the damaged buildings. These buildings are severally damaged and in danger of collapse. Air monitoring continued throughout the community. All levels were background except in an area that was directly downwind of the facility. The evacuation zone was decreased from roughly 200 homes to the 50 homes that were the closest in proximity to the site. EPA and START performed air monitoring inside one home at the request of the

resident. No issues found in the home. A press event was held. Residents are very angry due to the history of the site. OSC Eichinger met individually with these residents to listen to their concerns.

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ERRS completely extinguished the fire by 0900 hours, including the small hot spots in the buildings. Crews installed silt fencing and other erosion control between the site and the North Fork of Mill Creek. Air monitoring continued throughout the community and was terminated at 1600 hours. OSC Eichinger met with representatives from TEMA, TDEC, City of Lyles and Local EMA to discuss the incident. Crews walked the creek and did not observe any evidence of a release or an impact to wildlife. The group was satisfied with EPA operations and considered the situation under control. OSC Eichinger met with the property owner and discussed securing the site and the next steps. Owner will meet with the RPM on 12/23/13 to discuss how this fire impacted the NPL Site. START photo-documented the site. All air monitoring readings were background levels. All crews demobilized.

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

Property Owner and PRP

Industrial Plastics Company  
Mr Michael Rivers  
931-996-9034

### 2.1.4 Progress Metrics

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

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Determine how this incident impacted the NPL Site.

Determine if there are any potential environmental releases that need to be addressed.

#### 2.2.2 Issues

Surrounding residents concerned about the air quality inside of their houses.

Site is an active NPL site and further response and investigations will be needed by TDEC and Superfund Remedial Branch after the emergency response phase is completed.

## 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

No information available at this time.

## 3. Participating Entities

### 3.1 Unified Command

EPA/TDEC, TEMA, HEMA, City of Lyles

### 3.2 Cooperating Agencies

Multiple Fire Departments

Surrounding County EMA's

State of TN Department of Health

ATSDR

Hickman County Sheriffs Office

TSP

#### **4. Personnel On Site**

EPA - 3

START - 5

ERRS - 5

ERTM - 1

#### **5. Definition of Terms**

No information available at this time.

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

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

See [epaossc.org/industrialplasticsofire](http://epaossc.org/industrialplasticsofire)

##### **6.2 Reporting Schedule**

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

No information available at this time.