

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
All Pro Scrap - PRP Lead - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Initial PolRep  
All Pro Scrap - PRP Lead  
  
Indianapolis, IN  
Latitude: 39.7429104 Longitude: -86.1270614

**To:**

**From:** Shelly Lam, On-Scene Coordinator

**Date:** 12/21/2013

**Reporting Period:** December 20, 1800 hours - December 21, 1200 hours

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	<b>Contract Number:</b>
<b>D.O. Number:</b>	<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> Non NPL	<b>Operable Unit:</b>
<b>Mobilization Date:</b> 12/20/2013	<b>Start Date:</b> 12/20/2013
<b>Demob Date:</b>	<b>Completion Date:</b>
<b>CERCLIS ID:</b>	<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:  
Recycling - Used oil and drums

#### 1.1.2 Site Description

All Pro Scrap is a recycler of used oil and drums. The facility receives used vehicle oil filters and crushed drums, many of which previously contained hazardous waste. The oil filters and drums are processed through a shredder. A pit below the shredder captures oil and liquid waste. Metal and recovered oil are sent off-site for recycling. Liquid waste that cannot be recycled is disposed of by Future Environmental. Future Environmental reportedly disposed of 2,000 gallons of waste per week. Fluff and sludge are disposed of at Southside Landfill.

##### 1.1.2.1 Location

The facility is located at 1905 Lawton Avenue in Indianapolis, Marion County, Indiana, 46203. The facility is approximately 1.5 miles southeast of downtown Indianapolis. Site coordinates are 39.7429104 degrees north latitude and 86.1270614 degrees west longitude.

The site is located in a mixed-use area that includes industrial and residential properties. Residences are located north of the facility. Industrial properties are located to the east, west, and south.

Pleasant Run, a major drainage for Marion County, is approximately 1/3 mile north of the site. Run-off from the site enters the combined sewer overflow (CSO). During high flow, the sewers flow west to an outfall on Pleasant Run. Pleasant Run flows into the White River approximately two miles from the outfall.

##### 1.1.2.2 Description of Threat

On December 18, 2013, the shredder caught fire. The fire destroyed the shredder building and caused the release of oil and hazardous substances. Oily waste and fire-suppression water flowed off-site and into a quonset hut on a property to the east. Waste also flowed north into roadways, alleys, and residential properties. Waste impacted at least five residential properties and a neighboring industrial property. Wastewater and fire-suppression water entered nearby sewer drains. It is believed that oily waste flowed to the sewage treatment plant because there had not been significant precipitation during and prior to the fire. The Marion County Public Health Department (MCPHD) alerted the sewer utility about a potential slug of oily waste that could impact the sewage treatment plant.

All Pro Scrap reported a release to the National Response Center (NRC #1068922) on December 18th.

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

The potentially responsible party (PRP) has little information about residual waste contained in the drums. MCPHD inspected the facility in September 2013 and documented liquids seeping from drums and stained soil. Photographs from MCPHD's inspection are posted to the Images section of [www.epaosc.org/allproscrap](http://www.epaosc.org/allproscrap).

At the request of MCPHD, the business owner hired an environmental consultant who collected a limited number of soil and groundwater samples. Sample results indicated high concentrations of cadmium.

The Indiana Department of Environmental Management (IDEM) Industrial Waste Section inspected the facility on October 9, 2013 at the request of MCPHD. IDEM issued a Complaint Inspection Report that documented numerous violations. IDEM concluded that "All Pro Scrap is out of compliance for the mismanagement of fluids, unknown liquid materials, waste tires, oil, and failing to provide staff with a SPCC plan." The facility was referred to IDEM's enforcement section. IDEM's report is posted to the Documents section of [www.epaosc.org/allproscrap](http://www.epaosc.org/allproscrap).

On October 30, 2013, EPA conducted a site visit with IDEM's Industrial Waste and Emergency Response personnel. EPA and IDEM observed a large pile of drums and other containers with hazardous waste labels, most of which appeared to contain less than one inch of product; hundreds of drums of used oil filters; drums and totes that appeared to contain oil; a puddle of oily fluid on the ground; and stained soil. EPA documented that recovered oil was being stored in containers that had previously contained hazardous materials or hazardous waste as evidenced by corrosive and flammable labels on totes that had been covered over. EPA detected a strong solvent odor coming from the facility. IDEM collected three soil samples and identified tetrachloroethene (PCE) in one sample at the industrial direct contact soil exposure level as established in IDEM's Remediation Closure Guide (2012).

EPA conducted an inspection on November 5, 2013 for Spill Prevention Control and Countermeasures (SPCC). The facility was unable to provide a SPCC plan, although the facility has an oil storage capacity of several thousand gallons, including a 1,800-gallon pit below the shredder; 2,600 oil roll-off, aboveground storage tanks (AST) with capacities, 275-gallon totes; and hundreds of 55-gallon drums of used oil filters. In addition, the facility had very little containment for oil or hazardous waste. The same conditions were present as documented on October 30, except that the puddle of oil had been removed.

On November 8, 2013, a neighboring business, Material Handling Exchange, filed a report with the NRC (NRC #1065254) because odors of from All Pro Scrap. The odors caused employees at the neighboring business to feel ill, prompting the business to shut down for the day and send employees home. MCPHD responded, conducted air monitoring, and determined that the odors were likely caused because All Pro Scrap personnel were moving hazardous waste drums around the site.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

MCPHD and IDEM responded to the fire on December 18, 2013. On December 20th, MCPHD and IDEM requested assistance from EPA.

#### 2.1.2 Response Actions to Date

EPA On-Scene Coordinator (OSC) Shelly Lam responded to the site on December 20th. OSC Lam mobilized the Superfund Technical Assessment and Response Team (START) contractor for oversight of PRP operations and sampling. Currently, there is a 24-hour operational period with two shifts.

#### **December 20th, 1800-2200 hours**

EPA conducted a meeting with the PRP, the PRP's contractor, IDEM, and MCPHD at approximately 1800 hours. OSC Lam requested that the PRP conduct the following actions:

- Sample frac tank for volatile organic compounds (VOC), semivolatile organic compounds (SVOC), metals, cyanide, pH, polychlorinated biphenyls (PCB), pesticides, and flashpoint;
- Remove waste from roadways;
- Place clean sorbent materials around storm drains;
- Control run-off and prevent it from leaving the site;
- Sample the outfall on Pleasant Run;
- Require personnel working on site don personal protective equipment (PPE) to include, at a minimum, Tyvek suits, rubber overboots, gloves, hard hats, safety glasses, and reflective vests;
- Establish work zones, specifically exclusion and contaminant reduction zones;
- Provide a site-specific health and safety plan (HASP) by 2200 hours on December 20th; and
- Provide a work plan by 1200 hours on December 21st.

EPA conducted a follow-up meeting at 2200 hours. At that time, the PRP's contractor provided a draft HASP, had personnel wearing proper PPE, and had placed sorbent pads on oily waste in an alley. However, the PRP had not accomplished any of the other tasks. As such, OSC Lam mobilized the Emergency and Rapid Response Services (ERRS) contractor.

#### **December 20, 2200 hours to December 21, 1200 hours**

EPA and its contractors maintained boom around storm drains, placed sorbent boom in Pleasant Run, checked outfall locations on Pleasant Run, and began removing oily sediments from roadways.

The PRP and its contractors worked on controlling run-off from the site. They had previously installed a collection trench on the eastern part of the northern property boundary. During the reporting period, they installed a berm on the western part of the northern property boundary to divert run-off. They utilized a vacuum truck to capture potentially-contaminated run-off. Recovered liquids are stored in frac tanks on-

site. Additionally, they collected a sample from one frac tank.

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

EPA is collecting information on PRPs for potential enforcement actions. All Pro Scrap, Inc., also known as All Pro Shearing, Inc., is headquartered in Mishawaka, Indiana. All Pro is the operator of the site. The property is owned by Michael and Mary Ann Maio. EPA has not received access to the property to conduct response actions.

All Pro receives used oil filters from Crystal Clean and Safety-Kleen, and hazardous waste drums from various clients including Veolia Environmental.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Oily waste	Liquid	60,000 gallons			Pending

## 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

During the next reporting period, EPA and the PRP will clean the roadways of potentially-contaminated soil that was carried off-site by run-off; and continue to collect run-off water to prevent it from leaving the site. OSC Lam requested a Community Involvement Coordinator (CIC), who is mobilizing to the site. Additionally, OSC Mendoza is mobilizing to the site to cover the afternoon and early evening. The OSC and CIC will attempt to gain access for sampling and excavation of impacted residential yards and the neighboring industrial property.

#### 2.2.1.2 Next Steps

On-site contamination will need to be addressed beginning with establishing the nature and extent of contamination. EPA will work with the PRP to conduct removal actions at the site.

Waste characterization will be conducted and waste streams will be established.

#### 2.2.2 Issues

Heavy rain fell during the reporting period. Rain and flooding are forecast through Sunday, December 22nd.

## 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

EPA's OSC is the overall safety office for response activities. The PRP's contractor is operating under their own HASP, which has been reviewed by the OSC. EPA's contractors have their own HASPs. Personnel are attending daily safety briefings.

### 2.5.2 Liaison Officer

NA

### 2.5.3 Information Officer

There was extensive media interest in the fire. Local television outlets and the Indy Star newspaper had coverage of the fire. Links to news articles are posted to the Links section of [www.epaosc.org/allproscrap](http://www.epaosc.org/allproscrap).

EPA has not received any requests for media interview. The OSC will coordinate media interest with EPA's Office of Public Affairs.

## 3. Participating Entities

### 3.1 Unified Command

NA

### 3.2 Cooperating Agencies

MCPHD  
IDEM

## 4. Personnel On Site

The following personnel were on-site during the reporting period.

START	4
ERRS	8
IDEM	1
MCPHD	2
All Pro Scrap	2
ISG (PRP contractor)	4

## 5. Definition of Terms

AST	Aboveground Storage Tank
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIC	Community Involvement Coordinator
CSO	Combined Sewer Overflow
EPA	Environmental Protection Agency
ERRS	Emergency and Rapid Response Services
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
MCPHD	Marion County Public Health Department
NA	Not Applicable
NRC	National Response Center
OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PCE	Tetrachloroethene
PolRep	Pollution Report
PPE	Personal Protective Equipment
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
SPCC	Spill Prevention Control and Countermeasures
START	Superfund Technical Assessment and Response Team
SVOC	Semivolatile Organic Compounds
TDD	Technical Direction Document
VOC	Volatile Organic Compounds

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

The OSC has posted additional information to [www.epaosc.org/allproscrap](http://www.epaosc.org/allproscrap), including maps, photos, and reports.

### 6.2 Reporting Schedule

The OSC will submit the next Pollution Report (PolRep) on December 22, 2013.

## 7. Situational Reference Materials

NA