

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Progress PolRep
All Pro Scrap - PRP Lead
Indianapolis, IN
Latitude: 39.7429104 Longitude: -86.1270614

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From: Shelly Lam, On-Scene Coordinator
Date: 12/22/2013
Reporting Period: December 21, 1200 hours to December 22, 1200 hours

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date:
Response Authority: CERCLA	Response Type: Emergency
Response Lead: EPA	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date: 12/20/2013	Start Date: 12/20/2013
Demob Date:	Completion Date:
CERCLIS ID:	RCRIS ID:

ERNS No.:

State Notification:

FPN#:

Reimbursable Account #:

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 disposes 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 north and west to outfalls 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.

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.

On October 30, 2013, the U.S. Environmental Protection Agency (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-gallon oil roll-off, aboveground storage tanks (AST), 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. EPA and its contractors responded to the site on December 20th.

2.1.2 Response Actions to Date - **December 21st, 1200 hours to December 22nd, 1200 hours**

There were two shifts during the operational period.

The PRP and its contractor controlled run-off from the site using a collection trench, berm, and vacuum trucks to prevent it from leaving the site. The PRP discovered a roll-off located outside their northwest gate on Villa Avenue that contained oil and was leaking into the roadway. Contractors removed oil from the roll-off.

EPA's Superfund Technical Assessment and Response Team (START) and Emergency and Rapid Response Services (ERRS) contractors took the following actions:

- Maintained sorbent materials around storm drains;
- Mobilized two vacuum trucks to recover oily wastewater and prevent it from entering storm drains. Vacuum trucks were demobilized once rain stopped;
- Checked outfall and downstream locations on Pleasant Run. No sheen or discoloration was noted in the creek;
- Established a contamination reduction zone; and
- Gained access to two off-site properties.

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

Recovered liquids are stored in frac tanks on-site. Contaminated booms, pads, and personal protective equipment (PPE) are being staged in roll-offs at the site.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Oily waste	Liquid	Unknown			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 will continue to clean the roadways of potentially-contaminated soil and sediment that was carried off-site by run-off; continue to gain access for sampling and excavation of impacted residential yards and the neighboring industrial property; call in utility locates for off-site properties; and procure laboratory.

2.2.1.2 Next Steps

EPA is requiring the business owner to develop engineering controls for on-site containment until a removal action can be conducted. On-site contamination will need to be addressed beginning with establishing the nature and extent of contamination. Waste characterization will be conducted and waste streams will be established. EPA will work with the PRP to conduct removal actions at the site.

Removals will be conducted at off-site properties that were impacted by contaminated run-off.

2.2.2 Issues

Heavy rain fell during the reporting period. Rain stopped the morning of December 22nd. A flood warning is in effect until December 23rd. Below-freezing temperatures are forecast beginning December 23rd.

2.3 Logistics Section

Not applicable (NA)

2.4 Finance Section

2.4.1 Narrative

On-Scene Coordinator (OSC) Mendoza verbally requested increases for contractor ceilings.

Estimated Costs *

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	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$30,000.00	\$0.00	\$30,000.00	100.00%
TAT/START	\$20,000.00	\$0.00	\$20,000.00	100.00%
Intramural Costs				
Total Site Costs	\$50,000.00	\$0.00	\$50,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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 Health and Safety Plan (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

Community Involvement Coordinator (CIC) Don DiBlasio is working with off-site property owners to gain access for removal activities.

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.

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

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

EPA OSC	2
EPA CIC	1
START	4
ERRS	8
IDEM	1
MCPHD	1
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

PCE	Tetrachloroethene
PolRep	Pollution Report
PPE	Personal Protective Equipment
PRP	Potentially Responsible Party
SPCC	Spill Prevention Control and Countermeasures
START	Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/report

The OSC has posted additional information, including maps, photos, and reports, to www.epaosc.org/allproscrap.

6.2 Reporting Schedule

The OSC will submit the next Pollution Report (PolRep) on December 23, 2013.

7. Situational Reference Materials

NA

POLREP #2 Last Updated 12/22/2013