

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
Progress PolRep  
Kokomo Dump  
C564  
Kokomo, IN  
Latitude: 40.4770000 Longitude: -86.1650000

**To:**  
**From:** Shelly Lam, On-Scene Coordinator  
**Date:** 2/28/2014  
**Reporting Period:** February 24-27, 2014

## 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>	2/24/2014	<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 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

The City of Kokomo and its insurers have contracted with SESCO Group (SESCO). SESCO and its subcontractor, Environmental Restoration LLC (ER), mobilized to the site on February 24, 2014. During the reporting period, SESCO and ER accomplished the following:

- Established work zones;
- Began brush clearing for geophysical survey and soil sampling;
- Overpacked surface drums;
- Collected three soil samples beneath removed drums; and
- Conducted perimeter air monitoring for particulates.

SESCO and ER demobilized from the site on February 27, 2014 but will return in March for additional time-critical removal actions .

#### 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><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Drums	Solid	5	Pending	Not applicable (NA)	Staged on site pending disposal

Below is a schedule of milestones per the ASAOC.

<b>Order #</b>	<b>Milestone</b>	<b>Date Due</b>	<b>Date Started</b>	<b>Date Done</b>
89	Effective Date	8/5/2013	NA	8/5/2013
16b	Establish site security	NA	NA	8/5/2013
12	Contractor Notification, including Quality Management Plan	8/12/2013	NA	8/9/2013
13	Project Coordinator Notification	8/12/2013	NA	8/9/2013
18	HASP	9/4/2013	NA	9/4/2013
17a	Work Plan, including QAPP	9/4/2013	NA	9/4/2013
17b	Work Plan Revisions	10/27/2013	NA	10/27/2013
	Work Plan Approval	NA	NA	2/24/2014
16c	Field Investigation	4/21/2014	2/24/2014	
	Site boundary survey	3/17/2014		
	Phase I environmental site assessment	3/3/2014	2/3/2014	

	Brush clearance	3/3/2014	2/24/2014	
	Utility clearance	4/10/2014	2/18/2014	2/18/2014
	Surface drum removal	2/26/2014	2/24/2014	2/26/2014
	Geophysical survey	TBD		
16f	Surface and subsurface soil sampling	4/21/2014		
	Test pit excavations	TBD		
	Removal			
22	Final Report, 60 days after removal is complete			

## 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

Planned removal actions include the following:

- Conducting a site boundary survey;
- Providing a Phase I environmental site assessment report;
- Completing brush clearance;
- Conducting utility clearance;
- Performing a geophysical survey;
- Sampling surface and subsurface soil; and
- Excavating test pits.

#### 2.2.1.2 Next Steps

The areas to be removed will be determined by the surface and subsurface soil analytical results and the geophysical survey.

#### 2.2.2 Issues

There is significantly more yard waste (trees, grass, brush, etc.) covering the site than anticipated. The geophysical survey cannot be completed until the majority of yard waste has been removed from the site. The City of Kokomo is contracting with GreenCycle to remove the yard waste that has a beneficial reuse. The remaining yard waste may need to be disposed at a landfill.

## 2.3 Logistics Section

NA

## 2.4 Finance Section

No information available at this time.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Site personnel met daily for health and safety briefings. Personnel are working under an approved HASP. ER had a Site Health and Safety Officer on-site full-time with responsibility for implementing the HASP. Additionally, EPA's OSC has overall responsibility for health and safety.

### 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

EPA	1
START	1
SESCO	2
ER	4

## 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
ER	Environmental Restoration LLC
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
NA	Not Applicable
OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PolRep	Pollution Report
QAPP	Quality Assurance Project Plan
PRP	Potentially Responsible Party
SESCO	SESCO Group
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