U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Holcomb & Hoke Warehouse Fire - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial and Final BFPP-Lead PolRep
Holcomb & Hoke Warehouse Fire

Indianapolis, IN
Latitude: 39.7404510 Longitude: -86.1337630

To:
From: Shelly Lam, On-Scene Coordinator
Date: 3/10/2014
Reporting Period: October 30, 2013 - March 7, 2014

1. Introduction

1.1 Background

Site Number:	C5W8	**Contract Number:**	EP-S5-09-05
D.O. Number:	0136	**Action Memo Date:**	1/10/2014
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/11/2013	**Start Date:**	11/11/2013
Demob Date:	3/7/2014	**Completion Date:**	3/7/2014
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: Manufacturing/Processing/Maintenance

1.1.2 Site Description

The site is the former Holcomb & Hoke Manufacturing Company. Holcomb & Hoke purchased the property in 1903, and began operations in 1906. They manufactured popcorn poppers, paint brushes, wall panels, and other items throughout their history. The facility has been abandoned for several years.

The site is over 8 acres in size and contains multiple buildings, including an office building; former manufacturing and processing buildings, including a building used for electroplating; and a flammable storage building.

1.1.2.1 Location

Holcomb & Hoke is located at 1545 Van Buren Street in Indianapolis, Marion County, Indiana. Site coordinates are 39.7404510 degrees north latitude and 86.1337630 degrees west longitude. Adjacent properties include a railroad and industrial facility to the north; an industrial facility to the east; residential properties to the south; and a vacant field to the west, beyond which are additional residences and Interstate 65 (I-65).

1.1.2.2 Description of Threat

The facility caught fire on September 8, 2013 and burned for about 15 hours. Drums and asbestos-containing material (ACM) were involved in the fire. Radar images during the fire showed wind from the east, with debris from the fire possibly deposited to the west. Additionally, response personnel reported that the wind shifted, coming from the south during the fire, with additional possible deposition to the north. The Indianapolis Metropolitan Police Department (IMPD) reported the fire and possible releases to the National Response Center (NRC) on September 10, 2013 (NRC #1059783).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Below are results from the site assessment the U.S. Environmental Protection Agency (EPA) conducted September 11 and 12, 2013.

Asbestos Samples

EPA received results from asbestos samples collected on September 11th. Of the bulk samples collected, four contained chrysotile asbestos ranging from 2 to 20 percent (%). These samples consisted of floor tile (3-4%), mastic (2%), and pipe wrap (20%).

EPA also collected five air samples for asbestos analysis, including two blanks, one upwind of the facility, one downwind, and one placed on the contractor collecting asbestos samples. Air samples were non-detect for asbestos at less than 7.01 fibers per square millimeter.

Asbestos is a hazardous substance as defined by section 101(14) of CERCLA.

Ash Samples
EPA collected four ash samples to determine if metals presented a threat to human health. The ash results were compared to EPA's Removal Management Levels (RML) for industrial soil (August 12, 2012).

- In sample HH-Ash02-091113, lead exceed the RML of 800 micrograms per kilogram (mg/kg) at a concentration of 1,130 mg/kg.
- In samples HH-Ash01-091113, HH-Ash03-091113, and HH-Ash04-091113, all constituents were below the RMLs.

Lead is a hazardous substance as defined by section 101(14) of CERCLA.

Bag House Dust Samples
EPA collected a sample of dust from the bag house for metals analysis. All constituents were below the RMLs.

Drum/Container Samples
EPA sampled 4 drums and containers for volatile organic compounds (VOC) and flashpoint. One container was sampled for pH.

- In sample HH-WL03-091113, all VOCs were non-detect and flashpoint was above 180 degrees Fahrenheit (°F).
- In sample HH-WL04-091113, 2-butanone (methyl ethyl ketone [MEK]) was detected at a concentration of 200,000 micrograms per liter (ug/L); ethylbenzene at 62,500 ug/L; methylene chloride at 28,900 ug/L; 1,2,4-trimethylbenzene at 39,800 ug/L; and total xylenes at 238,000 ug/L. Flashpoint was above 180° F.
- In sample HH-WL05-091113, ethylbenzene was detected at 29,800,000 ug/L; isopropylbenzene (cumene) at 493,000 ug/L; n-propylbenzene at 176,000 ug/L; styrene at 1,160,000 ug/L; toluene at 933,000 ug/L; 1,2,4-trimethylbenzene at 42,800 ug/L; 1,3,5-trimethylbenzene at 38,700 ug/L; and total xylenes at 68,300,000 ug/L. Flashpoint was 86° F.
- In sample HH-WL06-091113, MEK was detected at 177,000,000 ug/L; ethylbenzene at 2,200,000 ug/L; methylene chloride at 30,400 ug/L; 4-methyl-2-pentanone (MIBK) at 135,000 ug/L; styrene at 57,800 ug/L; toluene at 50,000 ug/L; and total xylenes at 8,230,000 ug/L. Flashpoint was 66° F.
- In sample HH-WL07-091113, pH was measured at 1.0 standard units (SU).

Two samples met the characteristic for ignitability as established in the Resource Conservation and Recovery Act (RCRA), 40 Code of Federal Regulations (CFR) § 261.21. The samples had flashpoint below 140° F. One sample met the characteristic for corrosivity, established in 40 CFR § 261.22. Two samples met the characteristic for toxicity established in 40 CFR § 261.24 for MEK. As such, several containers were characteristic for hazardous waste, including HH-WL04-091113, HH-WL05-091113, HH-WL06-091113, and HH-WL07-091113. Additionally, MEK, cumene, ethylbenzene, methylene chloride, MIBK, styrene, toluene, 1,2,4-trimethylbenzene, and xylenes are hazardous substances as defined by section 101(14) of CERCLA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

IMPD requested assistance from the U.S. Environmental Protection Agency on September 10, 2013. IMPD requested that EPA assess environmental hazards on-site that could interfere with the fire scene investigation. On-Scene Coordinator (OSC) Shelly Lam mobilized to the site on September 10th and met with a detective from IMPD. OSC Lam mobilized the Superfund Technical Assessment and Response Team (START) contractor on September 10th and work began on September 11th.

Emergency response actions included stabilization, sampling, segregation, and securing abandoned drums and other containers. The time-critical removal actions included inventorying and performing hazard characterization on substances contained in drums and other containers; performing sampling and analysis to determine disposal options; and transporting and disposing off-site hazardous substances, pollutants and contaminants. EPA approved an Action Memorandum on January 10, 2014.

2.1.2 Response Actions to Date

EPA worked with a bona fide prospective purchaser (BFPP) to dispose of waste identified during emergency response actions.

On November 11, 2013, AcuityES, consultant for the purchaser, mobilized to the site, inventoried waste staged in a Conex box, and collected waste characterization samples.

On March 7, 2014, EPA oversaw AcuityES and contractor, Liquid Waste Removal, remove waste from the site.

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

EPA will attempt to identify PRPs and determine if they are financially viable to perform removal actions. The OSC received information that the property is in receivership.

EPA identified a BFPP who conducted voluntary actions to dispose of waste at the site.

2.1.4 Progress Metrics

Waste Stream	Quantity	Unit	Waste Code	Manifest No.	Disposal Facility
Non-hazardous, non-regulated solid and liquid products	17	DM		LWR007268	Twin Bridges Landfill, Danville, IN
Non-hazardous, non-regulated solid and liquid products	1	DF		LWR007268	Twin Bridges Landfill, Danville, IN
UN2809, RQ, Mercury, Contained In Manufactured Articles, 8, PGIII (Universal Waste)	1	DF		LWR007261	Environmental Enterprises, Inc., Cincinnati, OH
Non-regulated material, Computer monitors (Universal Waste)	2	EACH		LWR007261	Environmental Enterprises, Inc., Cincinnati, OH
UN1978, RQ, Waste Propane, 2.1	10	LBS		LWR007266	Vendor
UN1044, RQ, Waste Fire Extinguisher, 2.2	50	LBS		LWR007266	Vendor or Koorsen
NA2212, Asbestos	1	DM		LWR007266	Twin Bridges Landfill, Danville, IN
UN3264, RQ, Waste Corrosive Liquid, Acidic, Inorganic, NOS, 8, PGII (Sulfuric Acid, Phosphoric Acid)	2	DF	D002	011519795JJK	Environmental Enterprises, Inc., Cincinnati, OH
UN3266, RQ, Waste Corrosive Liquid, Basic, Inorganic, NOS, 8, PGII (Sodium Hydroxide, Sodium Sulfite)	15	DM	D002	011519795JJK	Environmental Enterprises, Inc., Cincinnati, OH
UN1993, RQ, Waste Flammable Liquid, NOS, 3, PGII (Paint, Petroleum Naphtha)	3	DM	D001, D035, F003, F005	011519796JJK	ESSROC Cement Corporation, Logansport, IN
UN1993, RQ, Waste Flammable Liquid, NOS, 3, PGII (Paint, Petroleum Naphtha)	1	CF	D001, D035, F003, F005	011519796JJK	ESSROC Cement Corporation, Logansport, IN

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
	Number of workers on site	18
Contaminant(s) of Concern	Sulfuric acid, phosphoric acid, sodium hydroxide, sodium sulfite, naptha, mercury, asbestos	

Oil response Tracking		
Estimated volume	Initial amount released	NA
	Final amount collected	NA
CANAPS Info	FPN Ceiling Amount	NA
	FPN Number	NA
	Body of Water affected	NA

2.2 Planning Section

2.2.1 Anticipated Activities
Emergency and time-critical removal actions are complete. No additional actions will be conducted.

2.2.1.1 Planned Response Activities
No additional actions are planned.

2.2.1.2 Next Steps
None.

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
OSC Lam was the Safety Officer for emergency and time-critical removal actions.

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 received support from IMPD, the Indianapolis Fire Department (IFD), City of Indianapolis, and Marion County Public Health Department (MCPHD).

4. Personnel On Site

During the reporting period, the following personnel were on-site related to removal activities:

Agency/Company	# Personnel
EPA	1
START	1
ERRS	1
AcuityES	1
Liquid Waste Removal	3
City of Indianapolis	1

5. Definition of Terms

°F	degrees Fahrenheit
ACM	Asbestos-Containing Material
BFPP	Bona Fide Prospective Purchaser
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency

ERRS	Emergency and Rapid Response Services
I-65	Interstate 65
IFD	Indianapolis Fire Department
IMPD	Indianapolis Metropolitan Police Department
MCPHD	Marion County Public Health Department
MEK	Methyl ethyl ketone
mg/kg	milligrams per kilogram
MIBK	4-methyl-2-pentanone
NA	Not applicable
NRC	National Response Center
OSC	On-Scene Coordinator
PolRep	Pollution Report
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
RML	Removal Management Level
START	Superfund Technical Assessment and Response Team
SU	Standard Units
ug/L	micrograms per liter
VOC	Volatile Organic Compounds

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information is available at www.epaosc.org/holcombandhoke.

6.2 Reporting Schedule

No additional PolReps will be submitted.

7. Situational Reference Materials

NA