

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Brittain Recycling Fire - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial
Brittain Recycling Fire

Frankfort, IN
Latitude: 40.2857080 Longitude: -86.5441630

To:
From: Jason Sewell, OSC
Date: 4/2/2014
Reporting Period: 4/1/2014-4/2/2014

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date:
Response Authority: CERCLA	Response Type: Emergency
Response Lead: PRP	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date:	Start Date: 4/1/2014
Demob Date:	Completion Date:
CERCLIS ID:	RCRIS ID:
ERNS No.:	State Notification: IDEM
FPN#:	Reimbursable Account #:

1.1.1 Incident Category

Emergency Response - Plastics Fire

1.1.2 Site Description

The Site is the location of a plastics and recyclable materials fire. The Site includes a light industrial/commercial processing building and outdoor storage area. The fire was contained to the outdoor storage area for bulked materials for recycling including wood pallets and polyethylene, polyurethane and styrene plastics. The Site also includes downwind areas affected by the fire smoke and downgradient drainage affected by fire suppression water runoff. Winds were steady and from the west during the fire and downwind areas were east of the fire Site and included light commercial properties, residential properties, parks and Suncrest Elementary School. Downgradient drainage included roadside ditches along County Road 0 N/S and County Road 200 West, Blinn Ditch to South Branch Wildcat Creek.

1.1.2.1 Location

The Brittain & Sons Recycling facility is located at 2021 W County Road 0 North/South, Frankfort, Clinton County, Indiana. The Site is located approximately 2 miles west of downtown Frankfort. Site coordinates are Latitude: 40.2857080, Longitude: -86.5441630.

1.1.2.2 Description of Threat

On April 1, 2014, a large fire broke out at the recycling center. The cause of the fire is under investigation by local and state fire investigators. Frankfort Fire Department, Clinton County Health Department and other supporting city and county agencies responded to the fire. The fire was generating heavy black smoke which was blowing east towards residential housing and downtown Frankfort. A shelter-in-place order was issued. IDEM responded to the fire, documented heavy black smoke that was visible from miles away, made a report to the National Response Center (NRC#1078467) and requested EPA air monitoring assistance. IDEM and Clinton County Health Department reported strong smoke and odors in downwind areas and including paint or waste-solvent like odors. IDEM documented materials for recycling were involved in the fire, including wood pallets, rubber, plastic, and metal. IDEM also reported a white fibrous material suspected to be asbestos containing materials (ACM). Fire smoke resulting from the combustion of plastics were presumed to contain hazardous substances, including volatile organic compounds (VOC), and harmful respirable particulate material (PM).

Fire suppression water was leaving the site through roadside ditches and entering Blinn Ditch, a tributary to South Branch Wildcat Creek. Concentrated fire suppression water was black in color, contained some amount of floating plastic crumb material, and had a detectable irritating odor. Considering the combustion of plastic materials in the fire, the fire suppression water runoff was presumed to contain hazardous substances.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

IDEM surveyed areas using a MultiRAE Pro hand held instrument. IDEM reported no detectable concentrations of contaminants; however, fire odors, including paint-like odors, were present near the fire and in downwind areas several miles away.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA OSC Jason Sewell consulted the Agency for Toxic Substances and Disease Registry (ATSDR) for air monitoring and air sampling strategies. Sewell mobilized Superfund Technical Assessment and Response Team (START) to perform air monitoring and air sampling. By the time START was able to begin monitoring or sampling, the active fire was mostly extinguished but with a few smoldering 'hot spots'.

START used Field Assessment Survey Tool (FAST) software, and real-time instruments including a MultiRAE multigas monitor and a DataRam DR4 particulate monitor for VOCs and PM. This assembly was used in a mobile/roving fashion in order to collect information over a wide area of city streets near the fire site and in downwind areas. Considering the fire was mostly extinguished by the time START was air monitoring, VOCs and PM were essentially non-detectable. The exception was when a fire hot spot would flare up and VOC and PM levels would increase. However, the fire department would immediately respond and extinguish the hot spot and VOC and PM levels would immediately return to non-detectable levels. ATSDR provided ambient air screening levels for VOCs and PM. START plotted air monitor results in separate figures for VOCs and PM. The results are color coded to indicate where readings were below or above ATSDR established reference levels. These figures were shared with IDEM, ATSDR and Clinton County Health Department and are posted to the documents section at www.epaosc.org/brittainrecyclingfire.

Three static air sampling locations were chosen based on immediately upwind, immediately downwind and downwind within a populated area. START collected air samples for follow up laboratory analysis at these three locations. Air samples collected: Summa canisters for VOCs, media filters for polyaromatic hydrocarbons (PAHs), and media filters for hazardous metals. Samples were delivered for lab analysis on April 2, 2014 with rushed turn around time. Lab results will be shared with IDEM, ATSDR and Clinton County Health Department and will be posted to the documents section at www.epaosc.org/brittainrecyclingfire.

The OSC and IDEM met with the RP. The RP explained the fire involved post-industrial/manufacturing recyclable materials. The RP advised there were no post-consumer or used materials stored onsite. The RP advised the fire mostly involved polypropylene, polyethylene, and polystyrene plastics. Wood pallets and minor amounts of rubber wire casing were present; however, the plastics made up the bulk of his inventory. The RP explained the white, fibrous material IDEM suspected for ACM was trimmings from the manufacturing of automotive headliners. The headliners would be primarily plastic with a rubber or foam type backing. START collected two bulk samples of the white fibrous material for analysis for asbestos.

2.1.2 Response Actions to Date

Actions taken April 1, 2014:

- Various local agencies responded to perform and support fire suppression actions.
- Clinton County Health Department and IDEM performed assessment of air quality for shelter-in-place.
- EPA/START mobilized and performed air monitoring for VOCs and PM.
- EPA/START deployed air samplers for VOCs, PAHs, and Metals.
- Clinton County Surveyor installed sewer plug in roadside ditch and earthen dam in Blinn Ditch to confine fire suppression runoff water.
- The responsible party mobilized a response contractor to containerize and properly dispose of fire suppression water. The contractor mobilized a vacuum truck, a trash pump and frac tanks totalling approximately 66,000 gallons of storage. The contractor filled all frac tanks April 1, 2014.

Actions taken April 2, 2014:

- Fire agencies extinguished isolated hotspots.
- EPA/START concluded air sampling for most sampler devices. One remaining sampler will be removed April 3, 2014.

- IDEM assessed Blinn Ditch for dissolved oxygen and other water quality parameters.
- The RP contractor mobilized additional frac tanks to increase storage capacity to approximately 132,000 gallons.
- Fire investigators performed inspection.
- EPA/START and IDEM demobilized.

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

EPA met with Rick Brittain who identified himself as the owner and operator of Brittain & Sons Recycling. Brittain hired Environmental Remediation Services (ERS) to perform removal actions.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Fire suppression water	Liquid	TBD	TBD	TBD	TBD

2.2 Planning Section

2.2.1 Anticipated Activities

START:

- Completion of air sample collection
- Delivery of air samples for lab analysis
- Reporting of air sample results

PRP/Contractor:

- Possible ongoing collection of fire suppression water
- Waste characterization of liquid wastes
- Offsite transportation and disposal of liquid wastes
- Installation of sand berming, straw berming or other measures to contain plastic crumb and other fire debris from leaving the Site through storm water runoff.
- Disposal of fire damaged recyclable materials as solid waste

Other:

- City or State oversight of solid waste disposal
- Management of storm water runoff

2.2.1.1 Planned Response Activities

EPA has concluded onsite activities except the demobilization of one air sampler. START will remove the sampler and deliver for lab analysis on April 3, 2014. No additional onsite activities are anticipated for EPA.

2.2.1.2 Next Steps

- Collect air sampler
- Deliver for lab analysis
- Report results to IDEM, ATSDR, county health

2.2.2 Issues

The fire suppression water runoff was unconfined for several hours before the county surveyor was notified of the fire. The surveyor took measures to contain fire water, including the use of a sewer plug to keep fire water onsite, and the use of an earthen dam to confine additional fire water within the first half mile of Blinn Ditch. Unfortunately, an unknown amount of fire water was beyond these two containment points and is expected to have discharged to South Fork (Branch) Wildcat Creek. IDEM performed periodic inspections and water quality monitoring for dissolved oxygen and other parameters. No fishkill was observed. No complete removal of dissolved oxygen was detected.

2.3 Logistics Section

START coordinated logistics for EPA actions.

The responsible party's contractor coordinated their own logistics.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The OSC is responsible for overall site safety. However, respective departments have their own HASPs and SOPs and are expected to follow good safety practices.

2.5.2 Liaison Officer

The OSC

2.5.3 Information Officer

Frankfort Fire Dept handled all news media inquiries April 1, 2014.

3. Participating Entities

3.1 Unified Command

Frankfort Fire Department
Clinton County Health Dept

Indiana Department of Environmental Management
Clinton County Surveyor
EPA

3.2 Cooperating Agencies

Responsible Party
Clinton County Emergency Management Agency
Red Cross
Clinton County Commissioners
Frankfort Mayors Office
Frankfort Building Commissioner

4. Personnel On Site

EPA: 1
START: 3
IDEM: 1
Clinton CHD: 3
Clinton Surveyor: 1
RP Contractor: 4
Numerous firemen
Other Cooperating agencies

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaossc.org/brittainrecyclingfire

6.2 Reporting Schedule

A Final POLREP will be issued after all air sample results are received, validated, and shared.

7. Situational Reference Materials

No information available at this time.