

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Final
Brittain Recycling Fire

Frankfort, IN
Latitude: 40.2857080 Longitude: -86.5441630

To:
From: Jason Sewell, OSC
Date: 4/9/2014
Reporting Period: 4/2/2014-4/9/2014

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: 4/2/2014
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, polypropylene and polystyrene 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 (aka, R&A Plastics) 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 and commercial areas and downtown Frankfort. A shelter-in-place order was issued via reverse 911 phone system; the area included Suncrest Elementary School.

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) among burning materials. 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 sustained elevated 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 to 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 PM levels would increase. However, the fire department would immediately respond and extinguish the hot spot 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. Air samples were delivered for lab analysis on April 2, 2014 with rushed turn around time. Lab results have been validated by EPA and evaluated by ATSDR. All results were below acute health screening levels. A final summary report, including air sample results, will be submitted to IDEM, Clinton County Health Department, ATSDR, and the EPA Records Center.

The OSC and IDEM met with the RP on April 1st, 2014. 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. Lab results received on April 3rd, 2014, documented the white material as not containing asbestos.

START collected a sample of fire suppression water runoff to analyze for VOCs, semi-volatile organic compounds (SVOC), and metals. Lab results documented the presence of: VOCs including benzene, methyl ethyl ketone, styrene, and toluene; PAHs including phenol and naphthalene; and trace amounts of metals including mercury and nickel.

2.1.2 Response Actions to Date

Actions taken by EPA between April 2nd and 9th, 2014:

- EPA demobilized
- EPA received/validated sample results for: air, fire suppression water, bulk ACM
- EPA reported lab results to Clinton County public health, IDEM
- EPA is finalizing a summary report

Other actions taken:

- IDEM performed solid waste inspection for disposal of fire-damaged debris
- PRP's contractor was performing waste characterization and determining disposal options for approximately 80,000 gallons of fire suppression water runoff.
- PRP is arranging for disposal of fire-damaged plastic recyclable materials. PRP advised the fire rendered virtually all of his 2 acres of outdoor stockpile of no commercial value.

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 containment and disposal of fire suppression water runoff. Brittain plans on disposing of fire related solid wastes himself.

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	80,000		TBD	Still under determination
Solid Waste	Solid	2 acres		NA	solid waste landfill

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	0
	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	80,000 of water
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Number of contaminated residential yards cleaned up	0
	Number of workers on site	4
Contaminant(s) of Concern	Fire involving: polypropylene, polyethylene, polystyrene	
Oil response Tracking		
Estimated volume	Initial amount released	Unknown
	Final amount collected	N/A
CANAPS Info	FPN Ceiling Amount	N/A
	FPN Number	N/A
	Body of Water affected	N/A
Administrative and Logistical Factors (Check X where applicable)		
Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	X Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	X Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted

Criminal Investigation Division involved	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	X High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year	X Active fire present
Hazmat Entry Conducted – Level A, B or C	X Incident or Unified Command established	X Actual air release (not threatened)

2.2 Planning Section

2.2.1 Anticipated Activities

START:

- Completion of Summary Report
- Closeout

Other:

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

2.2.1.1 Planned Response Activities

EPA has concluded onsite activities and has demobilized. All further progress at the Site will be monitored by the City and State.

2.2.1.2 Next Steps

NA

2.2.2 Issues

NA

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

NA

2.5.2 Liaison Officer

NA

2.5.3 Information Officer

NA

3. Participating Entities

3.1 Unified Command

Dissolved as of April 2, 2014
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

No additional POLREPs will be issued.

7. Situational Reference Materials

No information available at this time.