

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #5  
Progress  
Kokomo Dump  
C564  
Kokomo, IN  
Latitude: 40.4770000 Longitude: -86.1650000

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**From:** Shelly Lam, On-Scene Coordinator

**Date:** 6/5/2014

**Reporting Period:** April 23 - May 31, 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 tepee-style 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), accomplished the following:

- Arranged for drum disposal
- Received laboratory analytical data from soil sampling in April. Sample results are being validated; and
- Provided a Phase I Environmental Site Assessment Report on May 28, 2014.

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

Below is a schedule of milestones per the ASAOC.

Order #	Milestone	Date Due	Date Started	Date Done
89	Effective Date	8/5/2013	Not applicable (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	4/21/2014
	Site boundary survey	3/17/2014	3/7/2014	3/7/2014
	Phase I environmental site assessment	3/3/2014	2/3/2014	5/28/2014
	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	3/31/2014	
	Waste Pile Work Plan	7/7/2014		
	Waste Pile Sampling			
	Waste Pile Analytical Results			
16f	Surface and subsurface soil sampling	4/21/2014	4/14/2014	4/21/2014
	Laboratory Results	5/12/2014	NA	
	Test pit excavations	TBD		
	Removal	6/9/2014		
22	Final Report, 60 days after removal is complete	6/30/2014		

## 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

Several items are overdue according to the approved schedule. The OSC informed SESCO that the following items must be provided by the dates listed below.

- Updated schedule: June 12. This should include everything in the work plan plus the waste pile work plan and sampling;
- Geophysical survey report: June 13th;
- Validated analytical results: June 30th;
- Waste pile sampling work plan: July 7th;

#### 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 a significant volume of surface waste covering the site. The geophysical survey and excavation cannot be completed until the majority of surface waste has been removed. The City of Kokomo contracted with GreenCycle to remove yard waste that has a beneficial reuse. EPA is requiring that the City develop a work plan addendum to address sampling and removing the surface waste piles, which include brush mixed with metal, solid waste, and possibly hazardous waste. SESCO is working with the City's insurance carriers to obtain approval and funding for the waste pile sampling plan.

The Yard Waste Recycling Center re-opened to the general public on April 1, 2014. It is anticipated that additional brush will be deposited on-Site, further complicating access to areas that require assessment and/or removal.

## 2.3 Logistics Section

NA

## 2.4 Finance Section

## Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
START - Site Assessment	\$20,000.00	\$19,125.89	\$874.11	4.37%
START - Oversight	\$55,000.00	\$21,966.05	\$33,033.95	60.06%
<b>Intramural Costs</b>				
USEPA - Direct	\$100,000.00	\$57,301.87	\$42,698.13	42.70%
USEPA - InDirect	\$98,717.50	\$55,503.95	\$43,213.55	43.77%
<b>Total Site Costs</b>				
	\$273,717.50	\$153,897.76	\$119,819.74	43.77%

\* 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

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

No personnel were on-site for time-critical removal activities.

## 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

POLREP #5 Last Updated 6/5/2014