

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #6
Progress Report
Kokomo Dump
C564
Kokomo, IN
Latitude: 40.4770000 Longitude: -86.1650000

To:
From: Shelly Lam, On-Scene Coordinator
Date: 7/3/2014
Reporting Period: June 1-30, 2014

1. Introduction

1.1 Background

Site Number:	C564	Contract Number:	
D.O. Number:		Action Memo Date:	8/13/2012
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	2/24/2014	Start Date:	8/5/2013
Demob Date:		Completion Date:	
CERCLIS ID:	INN000510728	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

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 contracted with SESCO Group (SESCO). SESCO accomplished the following between June 1-30, 2014:

- Submitted a Geophysical Survey Report on June 10, 2014. The report has been posted to the Documents section of www.epaosc.org/kokomodump;
- Submitted a revised schedule on June 11, 2014; and
- Submitted analytical results and data validation reports on June 27, 2014. The results are from an extent-of-contamination survey conducted in April 2014. A table of the results is posted to the Documents section of www.epaosc.org/kokomodump. A summary of the results is provided below.

SESCO collected 29 surface soil samples from 26 locations; 47 subsurface soil samples from 21 soil borings ranging in depth from 0 to 28 feet below ground surface (bgs); and 6 groundwater samples. Samples were submitted for laboratory analysis including Resource Conservation and Recovery Act (RCRA)-8 metals; PCB; semi-volatile organic compounds (SVOC); volatile organic compounds (VOC); and dioxins.

Soil sample results were compared to Indiana Department of Environmental Management (IDEM) Remediation Closure Guide (RCG) (2014) screening levels for direct contact with residential and industrial soil.

Surface Soil Results

- Arsenic exceeded the residential screening level of 8.5 milligrams per kilogram (mg/kg) in 20 samples, and the industrial screening level of 24 mg/kg in one sample at a maximum concentration of 45.9 mg/kg.
- Lead exceeded the residential screening level of 400 mg/kg in one sample with a concentration of 724 mg/kg.
- SVOCs, including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cd)pyrene, exceeded residential screening levels in five samples. Benzo(a)pyrene concentrations exceeded the industrial screening level of 2.1 mg/kg in three samples at a maximum concentration of 7.9 mg/kg.
- PCBs, dioxins, and VOCs were detected but did not exceed relevant screening levels.

Subsurface Soil Results

- Arsenic exceeded the residential screening level of 8.5 mg/kg in 29 samples, and the industrial screening level of 24 mg/kg in 8 of those samples with a maximum concentration of 47.4 mg/kg.
- Lead exceeded the residential screening level of 400 mg/kg in five samples, with three samples exceeding the industrial screening level of 800 mg/kg, at a maximum concentration of 7,160 mg/kg.
- SVOCs, including benzo(a)anthracene, benzo(a)pyrene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene, exceeded industrial screening levels in one sample with a maximum concentration of 122 mg/kg for benzo(a)anthracene.
- PCB Aroclor 1248 exceeded the residential screening level of 3.1 mg/kg in three samples and the industrial screening level of 7.4 in one sample with a maximum concentration of 7.7 mg/kg.
- PCB Aroclor 1260 exceeded the residential screening level of 3.1 mg/kg in one sample, which had a concentration of 3.3 mg/kg.
- Dioxins and VOCs were detected but did not exceed relevant screening levels.

Groundwater Results

- VOCs were below IDEM's vapor exposure groundwater screening levels.

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 and/or the approved schedule.

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	6/13/2014	3/31/2014	6/10/2014
	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	6/27/2014
	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

SESCO is scheduled to provide a waste pile sampling plan by July 7, 2014. See Issues below.

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.

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

Not applicable (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. 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 notify IDEM and the Howard County Health Department of on-site activities.

4. Personnel On Site

No personnel were on-site during the reporting period 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
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
mg/kg	milligrams per kilogram
NA	Not Applicable
OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PolRep	Pollution Report
QAPP	Quality Assurance Project Plan
PRP	Potentially Responsible Party
RCG	Remediation Closure Guide
RCRA	Resource Conservation and Recovery Act
SESCO	SESCO Group
START	Superfund Technical Assessment and Response Team
SVOC	Semi-volatile organic compounds
USC	U.S. Code
VOC	Volatile organic compounds

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information is posted to www.epaosc.org/kokomodump.

6.2 Reporting Schedule

PolReps will be submitted monthly.

7. Situational Reference Materials

NA