U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Sugar Creek Scrap - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #8**
Progress
Sugar Creek Scrap
C5R4
Terre Haute, IN
Latitude: 39.4482050 Longitude: -87.4230074

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From: Jason Sewell, On Scene Coordinator
Date: 7/16/2014
Reporting Period: 7/14/2014-7/16/2014

1. Introduction

1.1 Background

Site Number:	C5R4	**Contract Number:**	EP-S5-08-04
D.O. Number:	0068	**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/2/2014	**Start Date:**	6/3/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	INN000510898	**RCRIS ID:**	INR000017699
ERNS No.:		**State Notification:**	IDEM
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) incident category:

Inactive dump

1.1.2 Site Description

The Site is a 28 acre parcel along the Wabash River southwest of downtown Terre Haute, IN. The City of Terre Haute (CITY) acquired the property in order to construct sewer improvements as required by EPA and the Indiana Department of Environmental Management (IDEM) to eliminate combined sewer overflows to the Wabash River. The City is also constructing a public walking path along the bank of the Wabash River. The path will travel through the Site and connect Fairbanks Park north of the Site to natural areas south of the Site.

Site characteristics include wooded and brushy areas, high ground, wetlands, and a surface impoundment. The Site is bordered to the north by wooded lowland, to the northeast by the former Wabash Environmental Technologies (the location of 2 previous EPA removal actions), to the northeast by ELANCO (animal food supplement manufacturer), to the east by Southwest Auto Company, and to the south by undeveloped high ground and wetlands. In 1997, IDEM discovered special and hazardous wastes were being improperly land disposed on along the southern Site boundary and into the next parcel to the south. IDEM issued administrative orders related to the findings and oversaw a RCRA Corrective Action that was completed by 2006.

There are no buildings or standing structures at the Site. The City has constructed a new entrance drive to the Site and is in the process of be erecting several thousand feet of perimeter fencing.

1.1.2.1 Location

The Sugar Creek Scrap Site is located west of Southwest Auto Company, 1901-1941 Prairieton Road, Terre Haute, Vigo County, Indiana and is between Southwest Auto and the Wabash River. The immediate area surrounding the Site is developed and undeveloped commercial property. Residential housing is within a half mile to the east. Fairbanks Park is a half mile to the North.

The geographical coordinates for the driveway entering the Site are 39.448326 north latitude and -87.418634 west longitude.

EPA established a Project Office at 1900 Prairieton Road, Terre Haute, IN.

1.1.2.2 Description of Threat

The City requested assistance from EPA after discovering coal ash & cinders, foundry sands, drums and other potential for hazardous substances at the Site. EPA performed a Site Assessment and documented levels of lead as high as 9,400 parts per million (ppm) (total lead) and 110 milligrams/Liter (mg/L) TCLP in unconfined waste piles and surface soils at the Site. Lead is designated as a hazardous substance under Section 102 of CERCLA and TCLP results were above hazardous waste regulatory levels for toxicity characteristic. Numerous drums, an above ground storage tank (AST), and other containers are also abandoned at the Site. Many containers are old, deteriorated and empty. At least one deteriorated drum was a lined acid drum.

Future site workers, including sewer construction workers and city sanitation workers, as well as future public park users could be exposed to hazardous substances or pollutants or contaminants presently at the Site. Contaminants may also migrate offsite by storm water runoff, flooding and erosion by the Wabash River, leaching to groundwater, wind action, or by foot or vehicle traffic.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA performed a removal site evaluation of the Site. The OSC and Superfund Technical Assessment and Response Team (START) contractors performed a site assessment including a site reconnaissance and a field sampling event on February 25th, 2013. EPA observed and documented the presence of approximately 150 55-gallon drums; numerous slag, foundry sand, ash and debris piles; and tires, heavy equipment, vehicles, and vehicle parts throughout the Site. Many of the drums and containers were deteriorated and empty. A large AST estimated at 10,000 gallons was located in the northeast corner of the retention pond and approximately 10 to 15 ft into the water. EPA collected one sediment sample, one surface water sample, and ten surface soil or waste pile samples. Analytical results documented lead in soil/waste pile samples exceeding: IDEM's direct contact standards for industrial soil and excavation; EPA's industrial removal management level (RML) for lead; and hazardous waste criteria for toxicity characteristic leaching procedure (TCLP) Lead. (Site Assessment Report, Weston, 2013)

EPA and START performed additional screening and sampling for metals May 9 through 13, 2014 to determine scope and extent of contamination in surface soil. A grid system was used to track data, the system will direct where removal work is to be performed. EPA also collected additional sediment samples in the surface impoundment and wetlands at the Site. Results will be distributed to the City and IDEM Site Investigations.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA, START contractors and Emergency and Rapid Response Services (ERRS) contractors mobilized to the Site on June 2, 2014 and established a Project Office near the Site entrance. Plans have been written to control site activities, including a site specific health and safety plan (SSHASP), Work Plan, Air Monitoring Plan, and Sampling and Analysis Plan.

The response actions described below will be implemented to directly address actual or potential releases of hazardous substances or pollutants or contaminants at the site which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Activities on-site will include:

-Screening additional areas for lead in waste piles and surface soils.

-Performing test trenching and screening for lead within the area where the City will be excavating a construction trench;

-Excavating surface soils and waste piles contaminated with lead greater than 800 ppm and arsenic greater than 40 ppm;

-Evaluation of drums, AST and other containers for hazardous substances or pollutants or contaminants;

-Staging, monitoring and sampling of wastes, including soils and containers as necessary, for waste characterization and disposal options;

-Implementing post excavation soil sampling/monitoring to determine if elevated sub-surface contamination will remain on site, and delineating remaining subsurface contamination detected before backfilling;

-Determine options for treatment, backfilling and covering of, or off-site disposal of, lead contaminated soils;

-Coordinating backfilling and restoring the excavated and disturbed areas with the City; and

-Transportation and off-site disposal of wastes at an approved facility.

Additional site activities will include security, perimeter air monitoring, and decontamination on the site, as needed to complete the removal action. This response action will be conducted in accordance with Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1) and Section 300.415 of the NCP, 40 C.F.R. § 300.415, to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. No immediate contact threats with hazardous substances are expected to remain at the site once the removal action is completed. The City anticipates restricted uses at the Site due to location and previous land uses. The City will be performing additional work after conclusion of EPA actions, including: solid waste removal, construction of new sewer structures, grading, and seeding on the Site.

2.1.2 Response Actions to Date

Prior to this operational period of July 14-16:
-Perimeter and work area air monitoring was performed according to the Air Monitoring Plan (AMP) established for the Site. The AMP established action levels for particulate matter of 10 microns and smaller (PM10) and for lead. Air monitoring has been performed during work hours where removal work was underway, except during periods of precipitation and subsequent hours of saturated soils when particulates were not expected to be airborne. Since June 2nd, there have been no exceedences of action levels for PM10 or lead.
-Air samples for lead were collected according to the AMP. Samples were collected: in the work area where airborne lead would be worst-case-scenario; during 16 different working days; and during 4 different types of activities that may have resulted in generating airborne lead. All air sample results were below detectable levels for lead.
-All Grid Areas were evaluated for lead and arsenic in surface soils by: collection of 5 point composite sample from each grid, processing of the sample including homogenization, and analysis by XRF. A key to the grid map is available in the Documents section of www.epaosc.org/sugarcreekscrap.
-The following grid areas exceeded 800 ppm of lead or 40 ppm of arsenic, were excavated to 1' below grade, and waste soils were consolidated to the onsite stockpile pending offsite disposal: I3, H2, G4, F4, Z1, Y1, X1, V1, W1, U1, T1, S1, S2, S3, S4, S5, S6, S7, R2, R3, R4, R5, Q5, P5, AND Q1.
-After excavation of each Grid Area, the grids were re-evaluated by the same method of sampling, processing, and analysis by XRF instrument. Grids still exceeding 800 ppm lead or 40 ppm arsenic will have visible barriers placed during backfill.

Actions performed during the operational period July 14-16:
-Perimeter and work area air monitoring was performed according to the AMP and during all work hours where removal work was underway, except during periods of precipitation and subsequent hours of saturated soils when particulates were not expected to be airborne. During this work period, there were no exceedences of action levels for PM10 or lead.
-The following grid areas exceeded the lead level of 800 ppm at the surface, were excavated and consolidated to the onsite stockpile pending offsite disposal: D3, D4, D5, D7, C2.1, C3, C3.1, C4, C4.1, C6, B2, B3, B4, B5, B6.
-After excavation of each Grid Area, the grids were re-evaluated by the same method of sampling, processing, and analysis by XRF instrument. Grids still exceeding 800 ppm lead or 40 ppm arsenic will have visible barriers placed during backfill.

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

EPA established an Enforcement Team including an OSC, regional counsel, enforcement specialist, and investigator. The Team has pursued an enforcement first strategy. The Team identified several Potential Responsible Parties (PRP) and issued General Notice Letters to Sugar Creek Scrap and Shirlee Levin (owner). EPA also issued 104e information requests to Sugar Creek Scrap, Shirlee Levin, and Gartland Foundry.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Soil/Waste containing Lead	solid	1500 tons	TBD	NA	Sycamore Landfill Pimento, Indiana
Drummed wastes, including: Benzene (D018) Lead (D008)	Liquid/sludge	6 x 55 gallons	TBD	Incineration	Tradebe Treatment & Recycling, East Chicago, IN

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Note, work at the Site will be suspended after July 16, 2014, pending the availability of the waste transportation contractor. Site activities are expected to resume normal hours on July 28th, 2014 until all actions are concluded.

Activities pending completion of removal action:
-Placement of visible barrier in excavated areas exceeding screening levels;
-Backfilling and grading of all excavation areas;
-Disposal of wastes at approved offsite facility.

2.2.1.2 Next Steps

EPA, and ERRS and START contractors will demobilize pending waste transportation contractor availability. It is anticipated that EPA, ERRS, and START will re-mobilize July 28th.

2.2.2 Issues

NA

2.3 Logistics Section

ERRS will provide for Logistics needs at the Site.

2.4 Finance Section

2.4.1 Narrative

EPA issued START Technical Directive Document Number TO-01-14-04-1036 to Oneida Tribal Integrated Enterprises for $25,000 on April 9, 2014.

EPA issued ERRS Task Order 68 with a Ceiling Limit of $200,000 to Lata Kemron on 5/1/2014. A Ceiling Limit amendment was issued 5/15/2014 with a ceiling increase of $300,000 and establishing a new ERRS Ceiling Limit of $500,000.

EPA issued a START TDD Amendment for TO-01-14-04-1036 to increase the Ceiling Limit $30,000 on June 5, 2014, bringing the new Ceiling Limit to $55,000.

EPA issued a START TDD Amendment for TO-01-14-04-1036 to increase the Ceiling Limit $20,000 on July 9, 2014, bringing the new Ceiling Limit to $75,000

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$500,000.00	$227,444.00	$272,556.00	54.51%
TAT/START	$75,000.00	$59,000.00	$16,000.00	21.33%
Intramural Costs				
USEPA - Direct	$25,000.00	$20,000.00	$5,000.00	20.00%
Total Site Costs	$600,000.00	$306,444.00	$293,556.00	48.93%

* 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

The OSC serves as overall Site Safety Officer. ERRS and START coordinated in the development of a SSHASP that incorporates regulatory, contractual and internal safety requirements. The ERRS Response Manager (RM) serves as the direct Site Safety Officer for ERRS personnel. All site workers reviewed and signed the SSHASP and are responsible for personal implementation of the plan and observance of safety practices at the Site.

2.5.2 Liaison Officer

The OSC serves as Liaison Officer for the Site.

2.5.3 Information Officer

The OSC serves as Information Officer for the Site until such time as another individual would be appointed. Media reports regarding Sugar Creek Scrap Site are available in the Links section of www.epaosc.org/sugarcreekscrap.

3. Participating Entities

3.1 Unified Command

EPA and the City Brownfields and Sanitation District are coordinating closely at the Site. The OSC developed a site Emergency Response Contingency Plan and distributed the plan to local fire, police, county health, and state environmental response agencies.

3.2 Cooperating Agencies

EPA
City Brownfields
City Sanitation District
IDEM Brownfields
IDEM Site Assessment

4. Personnel On Site

EPA OSC - 1
START - 1
ERRS - 5

City - 1

5. Definition of Terms

OSC - On-Scene Coordinator
START - Superfund Technical Assessment and Response Team contract
ERRS - Emergency and Rapid Response Services contract
TDD - Technical Directive Document
TO - Task Order
AMP - Air Monitoring Plan
SSHASP - Site Specific Health and Safety Plan

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/sugarcreekscrap

6.2 Reporting Schedule

Pollution Reports (POLREP) will be issued weekly in any week EPA removal actions are ongoing. Additional POLREPs may be issued due to special circumstances. A Final POLREP will be issued once EPA actions have concluded.

7. Situational Reference Materials

No information available at this time.