

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #9  
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:** 8/1/2014  
**Reporting Period:** 7/28/2014-8/1/2014

**1. Introduction**

**1.1 Background**

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

**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 constructed a new entrance drive to the Site and erected 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. Sampling and lab analysis performed during the removal action documented lead up to 50,000 ppm. 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 of personnel and equipment 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**

For operational period July 28-August 1:

- Re-Mobilization - De-mobilization occurred on July 17th pending scheduling by the waste transportation sub-contractor. EPA, START, and ERRS mobilized to the Site July 28th.
- Air Monitoring - Perimeter and work area air monitoring was performed for PM10 according to the AMP. During this work period, surface conditions on the crushed stone driveway were dry and instantaneous action levels for PM10 (150 micrograms/m3) would be exceeded every time a dump truck entered or exited the Site. These exceedences dropped below action levels within one minute and time weighted average warning levels established by the AMP (112.5 micrograms/m3 averaged over 1 hour) were never exceeded. ERRS used a water truck to wet Site roadways to suppress airborne PM10.
- Soil Excavation - 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: G4
- Post-Excavation Evaluation - 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. Grids requiring visible barrier: I3, G4, E6, B6.
- Backfilling of Excavation - Approximately three hundred tons of clean backfill were delivered and graded over the following excavated grid areas: I3, H2, G4, E6
- Waste Disposal - Approximately 1512 tons of soil were loaded from the waste stockpile and hauled for offsite disposal.

**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**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Soil/Waste containing Lead	solid	1512 tons	various	NA	Sycamore Landfill Pimento, Indiana

Drummed wastes, including: Benzene (D018) Lead (D008)	Liquid/sludge	6 x 55 gallons	Pending waste transportation August 5, 2014	Incineration	Tradebe Treatment & Recycling, East Chicago, IN

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Activities pending completion of removal action:

- No work is performed on weekends;
- 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

See 2.2.1.1

### 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
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$500,000.00	\$257,451.00	\$242,549.00	48.51%
TAT/START	\$75,000.00	\$64,000.00	\$11,000.00	14.67%
<b>Intramural Costs</b>				
USEPA - Direct	\$25,000.00	\$22,500.00	\$2,500.00	10.00%
<b>Total Site Costs</b>				
	\$600,000.00	\$343,951.00	\$256,049.00	42.67%

\* 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](http://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 - 4

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](http://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.

POLREP #9 Last Updated 8/8/2014