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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #10**
FINAL
Sugar Creek Scrap
C5R4
Terre Haute, IN
Latitude: 39.4482050 Longitude: -87.4230074

To:
From: Jason Sewell, On Scene Coordinator
Date: 8/8/2014
Reporting Period: 8/4/2014-8/7/2014

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:	8/7/2014	**Completion Date:**	8/7/2014
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 Sugar Creek Scrap 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 will be 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 around the eastern and southeastern boundaries. The western site boundary is the Wabash River. The southern and northern borders are heavy brush and wetland.

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, for the duration of the removal action. The Project Office was decommissioned on August 7th, 2014.

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. Further 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 during a field sampling event May 9 through 13 and during subsequent sampling during the removal to determine scope and extent of contamination in surface soil. A grid system was used to divide the Site into discrete sampling and removal areas. Data for evaluation, excavation, re-evaluation and backfilling was tracked by grid. EPA also collected additional sediment samples to be analyzed for pesticides, Semi-Volatile Organic Compounds (SVOC), metals, and poly-chlorinated biphenyls (PCB). Results documented no detections of pesticides, SVOCs and PCBs. Metals results were not detected or were well below screening levels. Results were forwarded 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. A Project Office was established at 1900 Prairieton Road, Terre Haute, IN, near the Site entrance. Written plans were established, including a site specific health and safety plan (HASP), Work Plan, Air Monitoring Plan, and Sampling and Analysis Plan. Response actions at the Site addressed actual or potential releases of hazardous substances or pollutants or contaminants at the site which may have posed an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities included:

-Air monitoring and sampling for onsite worker safety and offsite public health protection. Personal air samplers were worn by site workers for approximately twenty days throughout the removal. Samples were submitted for lab analysis for airborne lead. Lab results documented all air samples to be non-detectable for airborne lead. Particulate monitors were operated in work area and perimeter upwind and downwind locations during all removal actions. Monitors used radio telemetry to report real time readings to EPA contractors. Elevated particulates (PM10) were detected during dry periods lasting for several seconds as trucks traveled down gravel site roads. Exceedences immediately subsided and there were no exceedences of time weighted warning levels established for the site. EPA contractors used a water truck to wet site roads and reduce generation of airborne particulates.

-Surveying the Site for elevated metals, including: lead, arsenic, cadmium, chromium, and mercury using field instruments (XRF) and lab analysis. Lab results documented cadmium, chromium, arsenic and mercury below screening levels. XRF and lab results documented lead levels in surface soil as high as 55,000 ppm prior to removal.

-Test trenching within the area where the City will be excavating for construction. Trenching included the evaluation for buried containers potentially containing hazardous substances as well as the field screening and sampling of sub-surface materials (coal ash & cinder fill) for metals analysis. A water sample and duplicate sample were collected from groundwater encountered within one trench. Lab results for each trench documented lead levels in fill within each trench below the 800 ppm lead closure level for parks established by IDEM. Lab results for the groundwater samples documented non-detectable levels for PCBs, pesticides, VOCs and SVOCs. Lab results for groundwater documented lead at 72 micrograms/Liter and arsenic at 37 micrograms/Liter exceeding the IDEM RCG tap water standards of 15

micrograms/Liter for lead and 10 micrograms/Liter for arsenic.

-Excavation of discrete waste piles and surface soils from survey grids with lead exceeding 800 ppm or arsenic exceeding 40 ppm, the recreational soil direct contact screening levels for parks established by IDEM.

-Evaluation of drums, AST and other containers for hazardous substances or pollutants or contaminants. Six drums were determined to contain liquids, sludges or solids. All other empty drums were compacted for recycling. The drums with liquid, sludge or solids were in poor condition and contractors overpacked the drums prior to consolidating the drums to a central staging area. Drums were sampled for disposal options. Three drums exceeded 5 milligrams/Liter lead, the regulatory level for toxicity characteristic for lead. One drum exceeded 0.5 milligrams/Liter benzene, the regulatory level for toxicity characteristic for benzene. All drums were shipped offsite August 6th for hazardous waste disposal at an approved facility.

-Consolidation and staging of wastes pending waste characterization and disposal. Collection of waste characterization samples to determine disposal options.

-Post-excavation evaluation of grid areas for lead exceeding 800 ppm or arsenic exceeding 40 ppm. Visible barriers were placed in 4 grid areas exceeding these criteria. The locations and description of these visible barriers will be disclosed to the City (property owners) for inclusion in a deed restriction.

-Selection of a suitable backfill source. Suitable fill was located at a nearby commercial quarry. Fill was hauled to the Site, backfilled into excavated areas and graded.

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

EPA removal actions were completed at Sugar Creek Scrap Site on August 7th, 2014. EPA and ERRS and START contractors demobilized over August 6th and 7th. The response action was 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. The City anticipates restricted uses at the Site due to location and previous land uses. The City will be performing additional work, 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 August 4-7:

-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: (grids underlaying the waste stockpile area) V2, V3, V4, X2, X3, X4, Y2, Y3, Y4, Z2, Z3.

-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. No additional grids required visible barrier.

-Backfilling of Excavation - Clean backfill were delivered and graded over the following excavated grid areas: F4, C2.1, C3, C3.1, C4, C5, C5.1, C6, C6.1, D7, D3, D4, D5, B2, B3, B4, B5, B6

-Waste Disposal - Approximately 488 tons of soil were loaded from the waste stockpile and hauled for offsite disposal. The total amount of soils disposed of offsite is approximately 2000 tons.

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	2000 tons	various	NA	Sycamore Landfill Pimento, Indiana

Drummed wastes, including: Benzene (D018) Lead (D008)	Liquid/sludge	6 x 55 gallons	Various	Incineration	Tradebe Treatment & Recycling, East Chicago, IN

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	3
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
	Number of workers on site	7
Contaminant(s) of Concern	Lead contaminated soil; drummed waste including sludge containing lead and liquid containing benzene	
Oil response Tracking		
Estimated volume	Initial amount released	N/A
	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)		
q Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	**q** Community challenges or high involvement	**q** Radiological
q More than one PRP	**q** Endangered Species Act / Essential Fish Habitat issues	**q** Explosives
q AOC	**q** Historic preservation issues	**q** Residential impacts
q UAO	**q** NPL site	**q** Relocation
q DOJ involved	**q** Remote location	**q** Drinking water impacted
q Criminal Investigation Division involved	**q** Extreme weather or abnormal field season	**X** Environmental justice
q Tribal consultation or coordination or other issues	**q** Congressional involvement	**X** High media interest
q Statutory Exemption for $2 Million	**q** Statutory Exemption for 1 Year	**q** Active fire present
X Hazmat Entry Conducted – Level A, B or C	**X** Incident or Unified Command established	**q** Actual air release (not threatened)

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

All onsite activities are completed. EPA, ERRS, and START have demobilized from the Site.

2.2.1.2 Next Steps

An OSC report will be completed for this Site.

2.2.2 Issues

NA

2.3 Logistics Section

ERRS provided for Logistics needs at the Site.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The OSC served 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) served as the direct Site Safety Officer for ERRS personnel. All site workers reviewed and signed the SSHASP and were responsible for personal implementation of the plan and observance of safety practices at the Site.

2.5.2 Liaison Officer

The OSC served as Liaison Officer for the Site.

2.5.3 Information Officer

The OSC served as Information Officer for the Site. 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 coordinated 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

6.2 Reporting Schedule

This report is the Final POLREP that will be issued for this Site. A final OSC report will be placed in the Site File.

7. Situational Reference Materials

No information available at this time.