U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT Jehl Cooperage - Removal Polrep Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region IV

Subject:	POLREP #1
	Initiation of an Emergency Response
	Jehl Cooperage
	A4Y8
	Memphis, TN
	Latitude: 35.1260679 Longitude: -90.0611530

То:	Andy Binford, TDEC
From:	Steve Spurlin, OSC
Date:	11/13/2014
Reporting Period:	November 12 - November 13, 2014

1. Introduction

1.1 Background			
Site Number:	A4Y8	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/12/2014	Start Date:	11/12/2014
Demob Date:	11/13/2014	Completion Date:	
CERCLIS ID:	TND073544314	RCRIS ID:	
ERNS No.:	1100830	State Notification:	11/12/2014
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This is an emergency response initiated under the On-Scene Coordinators (OSC) warrant authority.

1.1.2 Site Description

The Site is a former drum reconditioning business. The business is closed and all process equipment has been removed from the property. Due to changes in the surrounding land use from commercial/industrial to residential, the Tennessee Department of Environment & Conservation (TDEC) requested the U. S. Environmental Protection Agency (EPA) Emergency Response & Removal Branch (ERRB) conduct a removal site evaluation (RSE) at the property.

1.1.2.1 Location

The property is located a 4 East Virginia Avenue, Memphis, Shelby County, Tennessee. The area around the Site is undergoing urban revitalization, and the Site is surrounded by residential apartment homes.

1.1.2.2 Description of Threat

During the RSE activities on November 12, 2014, the EPA OSC discovered two subgrade sumps that contained an unknown black liquid and sludge material. The origin of the material is suspected to be from the past facility operations. Piping leading to and from the sumps was observed, but the final discharge points could not be identified. The material could be migrating to a storm sewer or overflowing to surface soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Based on the OSC's observations of the unknown waste material, and potential for a release of hazardous substances to the environment, an emergency response was initiated to address the the material in the sumps.

2. Current Activities

2.1 Operations Section 2.1.1 Narrative EPA contacted ERRS contractor CMC, Inc., who utilized local contractor U. S. Environmental Services (USES), to provide a vacuum truck to start removing the material from the sumps.

2.1.2 Response Actions to Date

On November 12, 2014, USES removed approximately 200 gallons of liquid and sludge from the sumps. Debris and solids remained in the sumps, so it was decided to return to the Site on November 13, 2014, with additional equipment and labor to physically remove the debris and solids. Once the solids and debris were removed, a pressure washer was utilized to remove residual waste material from the sumps.

USES completed the work on November 13th. The sump cleanup yielded 4, 55 gallons drums and 1 tote of waste material. The material was transported to the USES shop for securing and sampling for waste disposal.

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

The Jehl Cooperage company is bankrupt. An EPA attorney and cost recovery person have been assigned to the Site. Historical files will be evaluated to determine if viable responsible parties exist.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
unknown dark liquid and solids		1 tote			
dark solids/sludges/debris		4 drums			

2.2 Planning Section

2.2.1 Anticipated Activities

The waste will be sampled for disposal and bids obtained for transport and disposal to an appropriate waste facility.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.