

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #14
Progress Report
Kokomo Dump
C564
Kokomo, IN
Latitude: 40.4770000 Longitude: -86.1650000

To:
From: Shelly Lam, On-Scene Coordinator
Date: 3/2/2015
Reporting Period: February 1-28, 2015

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 mid to 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 the Dixon Road Site 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, included lead, arsenic, polychlorinated biphenyls (PCB), benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene.

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 U.S. Environmental Protection Agency (EPA) On-Scene Coordinator (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

Additional site investigation in April 2014 documented hazardous substances including lead, arsenic, PCBs, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene; and pollutants and contaminants including benzo(a)anthracene. Refer to PolRep #6 for additional information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA executed an Administrative Settlement Agreement and Order on Consent (ASAO) 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 ASAO 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). For actions conducted before February 2015, refer to previous PolReps.

During this reporting period, SESCO and their subcontractor, Environmental Restoration (ER), excavated 26 test pits around anomalies identified during the geophysical survey and one test trench outside of the geophysical survey area. A map showing test pit locations can be found in the Documents section of www.epaosc.org/kokomodump.

A list of material found in each test pit is in the table below. Excavated materials were returned to the test pits, except for drums, one paint can, and uncontained paint excavated from the test trench. Those materials were staged on and covered by visqueen and left on-site pending disposal.

SESCO collected 17 samples from test pits and/or material found within test pits, such as drums. SESCO field screened samples with a photo-ionization detector (PID) and x-ray fluorescence (XRF) detector. Samples submitted for laboratory analysis had field screening readings with PID above 10 parts per million (ppm) and/or metal readings within +/- 10% of IDEM industrial direct contact screening levels.

In Test Pit 16, SESCO excavated along the east side of a concrete pad, where historical aerial photographs indicated a clam shell building had been located. It was discovered that the eastern wall of the pad extended to at least 12 feet below ground surface (bgs). SESCO cored through the center of the pad, which was only 7 inches thick. OSC Lam discovered a newspaper article from 1969 showing that clam shell buildings often had a sub-grade dump pit (see the Documents section of www.epaosc.org/kokomodump). As such, OSC Lam requested that SESCO submit a work plan for investigating the concrete pad, which SESCO submitted on February 23, 2015.

Between February 10-18, 2015, the City of Kokomo transported 138.01 tons of concrete to Kokomo Gravel and 2.56 tons of clay pipe to Touby Pike Recycling Center for recycling. On February 23-24, 2015, the City transported 659 tires to Leffler Tire Recycling.

Excavation ID	Excavation Date	Excavation Contents/Observations
Test Pit 1	2/5/2015	Concrete, metal strapping, brick, clay piping
Test Pit 2	2/5/2015	Concrete, brick, metal pieces, brown soil
Test Pit 3	2/5/2015	Concrete, brick, metal cans, metal pieces, paint can, wood, steel plates, petroleum odor
Test Pit 4	2/4/2015	Metal piping, brown/black soil, newspaper, glass jars, metal pieces, petroleum odor
Test Pit 5	2/3/2015	Asphalt shingles, concrete, metal bucket handle, wood, petroleum odor
Test Pit 6	2/3/2015	Concrete, metal strapping
Test Pit 7	2/4/2015	Brown soil, gravel, water
Test Pit 8	2/3/2015	Asphalt, asphalt shingles, metal strapping, wood debris, black soil, petroleum odor
Test Pit 9	2/3/2015	Brick, concrete, wood, brown silty soil
Test Pit 10	2/3/2015	Asphalt, bricks, metal debris, steel plates, strong solvent odor
Test Pit 11	2/3/2015	Concrete, metal piping, black soil
Test Pit 12	2/4/2015	Metal pieces, wood, drum lid, dark brown soil, 55-gallon drum at approximately 4 feet bgs
Test Pit 13	2/4/2015	Metal piping, metal pieces, bricks, glass jars, dark brown , possible incinerator waste: cinder-like material, bottles
Test Pit 14	2/4/2015	Wood, metal pieces, car seat, bricks, strong petroleum odor
Test Pit 15	2/4/2015	Metal piping, brown soil

Test Pit 16	2/3/2015	Concrete, dark brown soil, concrete foundation at depth of 12 feet bgs.
Test Pit 17	2/3/2015	Concrete pad present, excavation abandoned
Test Pit 18	2/3/2015	Concrete, metal piping, wood, reddish soil
Test Pit 19	2/3/2015	Tires, metal pieces, automotive parts, wood, brown/black soil
Test Pit 20	2/3/2015	Concrete, metal pieces, wood, dark brown soil
Test Pit 21	2/3/2015	Metal fence, bricks, plastic piping, dark brown soil
Test Pit 22	2/3/2015	Wood, concrete, tires, metal pieces, plastic pieces, dark brown soil, 55-gallon drum at approximately 3 feet bgs
Test Pit 23	2/4/2015	Tires, dark brown soil
Test Pit 24	2/4/2015	Tires, automotive parts, concrete, metal pieces, drum lid, dark brown soil, wood
Test Pit 25	2/4/2015	Brick, metal pieces, dark brown soil, possible incinerator waste: cinder-like material, bottles

Test Pit 26	2/4/2015	Clay tile drain, drum lid, dark brown soil, possible incinerator waste: cinder-like material, bottles
Test Pit 27	2/4/2015	Metal fence, metal strapping, concrete, wood, possible incinerator waste: cinder-like material, bottles
Test Trench	2/5/2015	Metal bucket lids, wood, glass bottles, brown soil, five 55-gallon drums, possible paint material

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>
Non-hazardous purge water	Liquid	100 gallons	70914	NA	CGS Services, Morristown, Indiana
Non-hazardous soil cuttings	Solid	410 gallons	70914	NA	CGS Services, Morristown, Indiana
Concrete (recycled material)	Solid	138.01 tons	NA	NA	Kokomo Gravel, Kokomo, IN
Clay pipe (recycled material)	Solid	2.56 tons	NA	NA	Touby Pike Recycling Center, Kokomo, IN
Scrap tires (recycled material)	Solid	659	NA	NA	Leffler Tire Recycling, Peru, IN

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
	Geophysical survey completion	1/8/2015	12/15/2015	12/15/2014
	Waste Pile Work Plan	7/7/2014	NA	7/7/2014
	Waste Pile Work Plan Approval	NA	NA	7/31/2014
	Waste Pile Sampling	9/11/2014	9/9/2014	9/11/2014
	Waste Pile Analytical Results	10/17/2014	NA	10/14/2014
	Waste Pile Relocation or Disposal	12/12/2014	12/2/2014	12/8/2014
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	2/6/2015	2/3/2015	2/5/2015
	Removal	TBD		
22	Final Report, 60 days after removal is complete	TBD		

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

In March, SESCO will conduct an investigation of the concrete pad to find out if it is a subsurface pit containing material that may be a threat to human health or the environment. SESCO will also submit a summary report, including a work plan for time-critical removal actions.

2.2.1.2 Next Steps

The areas to be removed will be determined by the surface and subsurface soil analytical results, the geophysical survey, and test pit findings.

2.2.2 Issues

None.

2.3 Logistics Section

NA

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

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 coordinate with the Indiana Department of Environmental Management (IDEM) and the Howard County Health Department.

4. Personnel On Site

The following personnel were on-site during the reporting period for time-critical removal activities.

EPA	1
START	1
SESCO	3
ER	3

5. Definition of Terms

ASAO	Administrative Settlement Agreement and Order on Consent
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
ER	Environmental Restoration
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
NA	Not Applicable
OSC	On-Scene Coordinator
PCB	Polychlorinated Biphenyls
PID	Photo-ionization detector
PolRep	Pollution Report
ppm	parts per million
PRP	Potentially Responsible Party
QAPP	Quality Assurance Project Plan
SESCO	SESCO Group
START	Superfund Technical Assessment and Response Team
TBD	To Be Determined
USC	U.S. Code
XRF	X-ray fluorescence

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