

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Final Polrep
Jehl Cooperage
A4Y8
Memphis, TN
Latitude: 35.1260679 Longitude: -90.0611530

To: Andy Binford, TDEC

From: Steve Spurlin, OSC

Date: 5/14/2015

Reporting Period: November 12, 2014 - April 15, 2015

1. Introduction

1.1 Background

Site Number:	A4Y8	Contract Number:	EP-S4-07-02
D.O. Number:	0131	Action Memo Date:	4/24/2015
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:	4/15/2015
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. During a Removal Site Evaluation (RSE), sumps containing hazardous waste liquids and sludges were discovered at the Site.

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 RSE at the property.

1.1.2.1 Location

The property is located at 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 migrate to a storm sewer or overflow to surface soils and waterways.

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.

In addition to the emergency response activities, EPA continued with the RSE which involved sampling soils

and suspected waste materials at the Site. Results for the samples collected during the RSE indicated lead at concentrations exceeding the EPA residential removal management level.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA contacted Emergency Response & Rapid Services (ERRS) contractor CMC Environmental Services, Inc. (CMC), 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. Additional equipment and labor was used 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 on-site work on November 13, 2014. The material was transported to the USES shop for securing and sampling for waste disposal. On January 7, 2015, the waste was shipped for disposal to the Excel TSD of Tennessee, Memphis, Tennessee. Nine drums and three poly totes were shipped under hazardous waste manifest identifying the waste as a hazardous waste solid, N.O.S. containing endrin and chlordane.

Based on the elevated levels of lead detected in the samples collected during the RSE, and the proximity of the material to nearby residential areas, EPA returned to the Site with CMC on April 13, 2015. The suspected burner ash containing the lead was removed from the surface areas of the Site. A large road cleaning brush was used to further remove residual waste from the surface. The waste was loaded into a truck and transported to the Waste Management of Tunica Landfill, Inc. landfill located in Robinsville, Mississippi. Three loads, totaling 43.14 tons of waste solids, were transported to the landfill.

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

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
sump dark liquid and sludge D012, D020, D031	liquid	3 poly totes	007526142		Excel TSD of TN, Memphis, TN TND980847024
sump dark solids/sludges/debris		9 drums	007526142		Excel TSD of TN, Memphis, TN TND980847024
Non hazardous lead bearing ash	solid	43.14 tons	nonhaz		Waste Management Landfill, Robinsville, MS

2.2 Planning Section

2.2.1 Anticipated Activities

No further EPA actions are anticipated for the Site.

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.