

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pioneer Asphalt BTEX & Asbestos Removal - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial
Pioneer Asphalt BTEX & Asbestos Removal
B5YU
Lawrenceville, IL
Latitude: 38.7195372 Longitude: -87.6790175

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From: Kevin Turner, OSC
Date: 9/30/2015
Reporting Period: 9/21/2015 - 9/30/2015

1. Introduction

1.1 Background

Site Number:	B5YU	Contract Number:	
D.O. Number:		Action Memo Date:	3/27/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/14/2015	Start Date:	9/14/2015
Demob Date:		Completion Date:	
CERCLIS ID:	ILN 101 015 004	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Removal and disposal of abandoned drums that contain mostly degraded asphalt and oils; recovery and disposal of friable asbestos containing materials that are extensively damaged and weathered which has released asbestos fibers onto the ground requiring proper recovery and disposition; cleanout of a former API Oil Separator; and, removal and disposal of former tar storage tanks and miscellaneous debris scattered about the site.

1.1.2 Site Description

The Site, is a former facility that was a comparatively small asphalt plant, located on slightly over twelve acres. The plant was divided into four areas: Area 1 consisting of an office building, locker room, laboratory, maintenance shop, and still area; Area 2 was a tank farm storage area; Area 3 was the container filling operations and tank car loading and unloading area; and Area 4 was the product storage, product bagging and filled asphalt operations area.

From the early 1900s until approximately 1985, the Pioneer Asphalt Corporation (Pioneer Asphalt) manufactured asphalt and other related products at the Site. In July 1985, the Ziegler Chemical and Mineral Corporation acquired the Pioneer Asphalt Corporation, incorporating and renaming it the Pioneer Asphalt Corporation. In November 1985, the Pioneer Asphalt Corporation acquired the Site and facility from the Witco Corporation, and commenced asphalt and other product manufacturing there. At the present time,

the Pioneer Asphalt Corporation still owns the Site but has not manufactured anything at the Site since approximately 2004.

The Former Pioneer Asphalt Plant was an asphalt production facility located on-site in Lawrenceville, Illinois. In 1924, the Wishnich-Tumpeier Chemical Company purchased the facility and began manufacturing asphalt. Although owned and operated by several different entities over time, the Former Pioneer Asphalt Plant was consistently used to manufacture asphaltic products. In 1985, the facility was incorporated as Pioneer Asphalt Corporation. Pioneer Asphalt produced a number of industrial products at the Site including, but not limited to, coatings, sealers, adhesives, ink additives, and fillers. Production of unique asphalt blends, compounds, and oxidized products also took place at the Site by mixing raw asphalts with other raw materials. Pioneer Asphalt terminated operations at the Former Pioneer Asphalt Plant facility sometime in 2004.

Most recently, operations at the Site produced specialty asphalts, including but not limited to various roofing asphalts, culvert coating, vault sealer and waterproofing primer. The asphaltic materials were stored/processed in insulated above ground storage tanks (ASTs) and "pans", and various petroleum products were stored in on-site drums. In 2009, a third-party demolition contractor was hired to demolish the on-site structures and ASTs. This demolition contractor performed Site demolition without securing the necessary permits and demolished only those items with scrap value and areas that were easy to access. As a result, releases of asphaltic materials and other petroleum products along with the release of friable asbestos containing materials (ACM), have occurred and unstable environmental conditions that remained thereafter at the Site that require the current removal actions.

The Site is surrounded on three sides by the Indian Refinery Superfund Site. Prior subsurface testing completed in the investigation of the Indian Refinery property has shown that the Pioneer Asphalt Site's subsurface environment has been impacted as a result of this adjacent property. The majority of the materials of concern at the Site include asbestos-containing materials (ACMs) and petroleum-related asphaltic materials. The ACMs can be found on existing structures and on certain soils, and are likely impacting the air on and around the Site. The asphaltic materials are present within both intact and partially demolished ASTs, and are in various physical states ranging from solids to semi-solids that are insoluble in water but are likely impacting only the surface of the Site. The drums on-Site are located on concrete/asphalt surfaces, and contain asphaltic materials. As a result of the conditions outlined above, this RAWP does not generally include subsurface sampling and/or chemical analysis at this time¹, but does include the remediation of surficial soils up to 3 inches that exhibit the presence of ACMs and/or visual evidence of impact associated with the materials of concern at the Site.

The dilapidated conditions at the Site, and the resultant environmental threats, prompted IEPA to sign an order to seal the facility on July 1, 2010. On August 26, 2010, the IEPA submitted a letter to USEPA requesting assistance from the USEPA Region 5 Superfund Division in conducting a potential time-critical removal action at the Site.

1.1.2.1 Location

The Site is located at 802 Ash Street, Lawrenceville, IL, 62439 and covers approximately 12-acres within the southeastern end of Lawrenceville.

1.1.2.2 Description of Threat

Extensive threats present at the Pioneer Asphalt Site are due primarily to the existence of containerized hazardous waste and substances in drums, barrels, tanks and other bulk storage containers along with friable ACM that has been damaged and is weathered with ongoing fiber releases.

The hazardous wastes found on the Pioneer Asphalt site have no secondary containment, and the contents of some of the 55-gallon drums are documented as containing ignitable and corrosive hazardous substances. U.S. EPA has documented more than 250 fiber and metal drums on-site. Some of the drums contained a black tar-like substance and several drums were overturned or ruptured. The main roadway of the facility is covered with a tar-like substance which has been released from cut-off above-ground tanks.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During site visits, both the Illinois EPA and U.S. EPA have documented the presence of waste tars (flux, soft wax, unipet 9 wax, and roofers flux asphalt) and other contaminants that demonstrated the hazardous characteristics of ignitability and corrosivity, friable asbestos within the demolition debris and soils on-site, and asbestos on above-ground storage tanks.

There are a number of drums as well as large tanks containing possible hazardous substances that is subject to removal as part of this response action.

Illinois EPA (IEPA) representatives conducted a site investigation in July 2010, which included the collection of samples from several different types of media. IEPA inspectors identified approximately 250 fiber or metal drums on-Site that were exposed to the outside elements, of which several drums were overturned or ruptured. IEPA observed a black tar-like substance in some drums, while other drums were unlabeled with unknown contents. IEPA's samples collected from some of the drums on-Site revealed elevated levels of benzene, toluene, ethylbenzene, and total xylenes (BTX). Contents of two waste drums indicated elevated concentrations of total petroleum hydrocarbons (TPH) and diesel range organics (DROs), at 29,800 milligrams per kilogram (mg/kg) and 41,800 mg/kg, respectively. One sample was collected from a drum labeled "phosphoric acid" and was found to have a pH of 1.19, which is characteristic of corrosivity. IEPA sample #301 had a flashpoint result of 80 degrees Fahrenheit (°F) and was considered a hazardous waste that exhibits the characteristic of ignitability. IEPA also collected six samples of suspected ACMs from surface debris on concrete slabs, thermal insulation, and tank bases located on-Site. Each of the sampled areas tested positive for friable asbestos (transite, crocidolite, and amosite).

During the IEPA's July 2010 inspection, it was observed that several of the ASTs had been cut down to a level exposing the liquid contents of the tanks, and were releasing tar-like materials onto the ground.

Depending on their location within the Site, these tanks contained fuel oil, asphalt flux, soft wax, hard asphalt, propane extracted asphalt (hard asphalt), unipet 9 wax, and roofers flux asphalt. Oily surface water was observed entering an American Petroleum Institute (API) oil/water separator located on the east side of the Site; however, IEPA samples did not reveal any significant levels of BTEX or TPH at that time.

The dilapidated conditions at the Site, and the resultant environmental threats, prompted IEPA to sign an order to seal the facility on July 1, 2010. On August 26, 2010, the IEPA submitted a letter to USEPA requesting assistance from the USEPA Region 5 Superfund Division in conducting a potential time-critical removal action at the Site.

On February 20, 2013, U.S. EPA observed continued deteriorating on-site conditions. U.S. EPA observed spills and prior releases of waste tars, in the same area where Illinois EPA had documented waste tars that were hazardous because of the characteristics of ignitability that may migrate from the Site via storm water discharge to contaminate nearby properties or the municipal storm water collection system.

As a result to the existing site conditions, an AOC was entered into voluntarily with the USEPA and the Respondent, Ziegler Chemical & Mineral Corp., that was executed on September 22, 2014.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Respondent Pioneer Asphalt Corporation c/o Ziegler Chemical & Mineral Corp., has agreed to perform the drum disposal, asbestos removal and site debris removal activities in accordance with the criteria and time-lines as specified in the December 24, 2014, Pioneer Asphalt Company Work Plan that EPA approved as part of the September 22, 2014 AOC.

2.1.2 Response Actions to Date

The OSC has tasked the Respondent to conducted or perform the following actions:

- Develop and implement a Removal Action Work Plan (RAWP);
- Develop and implement a Site Health & Safety Plan (HASP) consistent with the work to be performed, but not limited to an air monitoring plan that address asbestos removal and friable asbestos containing materials (ACM) during the removal of scrap steel and other metal products on the site;
- On September 14, 2015, and consistent with the agency approved Removal Action Work Plan, Pioneer Asphalt Corporation and its contractor representatives, Pioneer Environmental Services LLC and CENPRO Services Inc., initiated project mobilization including the necessary equipment and manpower to remove drummed materials, abate friable ACM scattered about the site, removed up to 3-inches of soil where asphaltic tars are presently observed and remove miscellaneous debris scattered across the site.
- Retain the services of a third-party asbestos air monitoring contractor (Farmer Environmental Services, LLC.).

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

The work is being conducted in accordance with an Administrative Order on Consent. No additional enforcement actions are anticipated at this time.

2.1.4 Progress Metrics

As part of the start-up of clean-up activities on this site, the Respondent contractors mobilized to the site and initiated site preparations to clean out a metal shed and prepare it for use as a command post which includes field office, breakroom and decontamination station. In addition the following activities were completed:

- The contractors arranged for electrical and water service be provided to support project needs inside the temporary field office and decontamination station.
- The contractors completed the improvements to the build-out of the temporary field office and decontamination station.
- The third-party asbestos air monitoring contractor representative (Farmer Environmental Services) initiated asbestos clearance sampling and asbestos air monitoring.
- The contractors initiated the removal of asphaltic tars on top of the large concrete pad and power-washed the surface to the best extent practical.
- The contractors placed clean rock next to the concrete pad to facilitate ingress/egress of trucks containing drummed materials, ACM and miscellaneous debris. Also, the contractors constructed a truck washing station to facilitate decontamination of all trucks leaving the site.
- The contractors initiated the loading, transportation and disposal of drummed asphalt materials. That same day, ACM abatement work was initiated and will continue as the site

debris is removed during the course of this removal effort.

- The contractors initiated removal of liquids and solids from the on-site API Separator. The cleaning of this site feature is expected to extend into the future.

The contractors arranged for the removal of drummed characteristically hazardous waste liquids stored in drums at the site.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Asphalt Impacted Debris	Soil and Misc. Debris	NA		Land Applied	Republic Services
Asbestos Impacted Debris	Soil and Misc. Debris	NA		Land Applied	Republic Services
Asphalt Impacted Water	Decontamination Fluids	NA		Biological Treatment	Safety Kleen

2.2 Planning Section

2.2.1 Anticipated Activities

Ongoing site operations will abate ACM, remove and dispose of all non-hazardous drummed materials along with remove debris scattered across the site.

Sixteen ASTs are currently present at the Site. With the exception of one tank that was used for the storage of propane, the remaining tanks were utilized for the storage of asphaltic materials. Of the ASTs identified, seven tanks are intact with the exception of the tank piping which has been removed. Since the tank piping has been removed, some leakage of asphalt from the tanks has occurred when outdoor temperatures were high enough to lower the viscosity and allow the asphaltic materials to flow. The remaining ten ASTs have been partially demolished and contain residual asphalt products. Prior to removing the ASTs from the Site, any remaining ACMs on the exteriors of the tanks will be properly abated.

Following removal of the ASTs, impacted surface soils will be removed using excavation equipment. Once soil removal activities are initiated, the removal area may be expanded if visual observations of soil impacts (e.g., staining and/or sheen) are noted outside the initial inspection area.

Additionally, an API separator on the east side of the Site was previously observed to contain oily influent water. The contents of API separator will be pumped out and will be transported by a licensed waste hauler under standard waste manifesting procedures to an appropriate disposal facility. The API separator will be cleaned by the removal contractor and any wastewater generated will also be transported to an appropriate disposal facility.

Various debris material types are present throughout the Site, particularly in the area of the former buildings and ASTs. The debris generally consists of cinder blocks, bricks, scrap-metal and hardened asphaltic materials. Some retail-sized containers of various chemicals were also observed in various areas of the Site. Most of the debris at the Site was found to contain ACMs. As a result, the majority of the debris at the Site will be disposed during asbestos abatement activities.

2.2.1.1 Planned Response Activities

During the implementation of the removal action, waste materials will be segregated and removed into the following categories:

- Non-friable asbestos-containing construction debris
- Friable asbestos-containing construction debris
- Contaminated soils
- Empty drums
- Non-hazardous solid waste drums
- Hazardous drums (i.e., mineral spirits or phosphoric acid)
- Non-asbestos impacted scrap metal
- Asphalt pan materials

The majority of the wastes will be directly loaded into lined trucks or dumpsters/roll-off containers. Any debris that is too large for transport will be mechanically demolished prior to load out and transport. Depending on the location of removal activities, some wastes (i.e., debris, and/or contaminated soils) may be temporarily stockpiled prior to transport and disposal.

2.2.1.2 Next Steps

Continued site operations will abate ACM found in many areas at the site along with the removal of hazardous and non-hazardous waste and miscellaneous debris materials. The API Separator cleaning will continue to eliminate oily discharges and sheen emanating from the API Separator.

2.2.2 Issues

None at this time. However, inclement weather may create weather delays to the project schedule.

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

A TDD was issued to Tetra Tech Inc. (START) on 10/7/2014. The START project budget is: \$25,000.00. START costs to date are \$1,722.00.

2.5 Other Command Staff

2.5.1 Safety Officer

All field work conducted at the site is under an approved Health and Safety Plan (HASP).

2.5.2 Liaison Officer

NA

2.5.3 Information Officer

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

Illinois EPA

4. Personnel On Site

USEPA	1
Cenpro Environmental Services, Inc.	7
Pioneer Environmental Services, LLC.	1
Farmer Environmental Services, LLC.	1
START	1
Illinois EPA	2

5. Definition of Terms

ACM	Asbestos Containing Materials
AOC	Administrative Order on Consent
API	American Petroleum Institute
AST	Above-ground Storage Tank
BTEX	Benzene, toluene, ethyl benzene, xylenes
EPA	Environmental Protection Agency
FPN	Federal Project Number
HASP	Health and Safety Plan
IEPA	Illinois Environmental Protection Agency
NA	Not Applicable
OSC	On-Scene Coordinator
PolRep	Pollution Report
PRP	Potentially Responsible Party
Respondent	Ziegler Chemical & Mineral Corp.
START	Superfund Technical Assessment and Response Team
UST	Underground Storage Tank
USEPA	United States Environmental Protection Agency

6. Additional sources of information

6.1 Internet location of additional information/report

epaossc.org/Pioneer_Aspphalt_BTEX_and_Asbestos_Removal

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 10/21/2015