

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Hoosier Wood Preservers Time-Critical Removal - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial Report
Hoosier Wood Preservers Time-Critical Removal
C57K
Indianapolis, IN
Latitude: 39.7224100 Longitude: -86.2212300

To:
From: Shelly Lam, On-Scene Coordinator
Date: 11/13/2015
Reporting Period: November 9-13, 2015

1. Introduction

1.1 Background

Site Number:	C57K	Contract Number:	EP-S5-09-05
D.O. Number:	168	Action Memo Date:	8/15/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/9/2015	Start Date:	11/9/2015
Demob Date:		Completion Date:	
CERCLIS ID:	INN000505835	RCRIS ID:	IND075982975
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Incident
Category: Manufacturing/Processing/Maintenance - Lumber and wood products/wood preserving/treatment

1.1.2 Site Description

The site is the former Hoosier Wood Preservers. The site is 7.75 acres in size and has ten buildings, including process buildings, storage buildings, a garage, and office.

The facility operated from 1969 to 2013 as a wood treating business that used chromated copper arsenate (CCA) and borate in pressurized wood treatment cylinders. Historically, the facility also used creosote and pentachlorophenol to treat wood. The facility has been abandoned since 2013.

1.1.2.1 Location

Hoosier Wood Preservers is located at 3605 Farnsworth Street in Indianapolis, Marion County, Indiana. Site coordinates are 39.7224100 degrees north latitude and 86.2212300 degrees west longitude. The site is located approximately 3.5 miles southwest of downtown Indianapolis.

The surrounding area is primarily industrial, although commercial properties are located to the south. Residential properties are within 200 feet to the east and northeast.

1.1.2.2 Description of Threat

Arsenic is present in soil, material on the ground, and fire debris at a maximum concentration of 272,000 milligrams per kilogram (mg/kg), above the Environmental Protection Agency's (EPA) industrial Removal Management Level (RML) of 300 mg/kg. Arsenic is a hazardous substance as defined by section 101(14) of CERCLA. Laboratory analytical results confirmed the presence of arsenic at concentrations exceeding relevant regulatory and screening levels. Hazardous substances represent an actual or potential exposure threat to nearby human populations. Possible release mechanisms for arsenic in soil include fugitive dust generation; tracking of contaminated soil, ash, and material on the ground; and dermal contact with contaminated material. Exposure routes include direct contact, ingestion, and inhalation of arsenic particles. Potential human receptors include trespassers, emergency response workers, future site workers, and nearby residents. There was evidence of trespassing at the site. Residential properties are located within 200 feet of the site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Drip Pad Building caught fire on May 25, 2015. EPA conducted emergency response actions at the site beginning on May 26, 2015, which involved consolidating, packaging, and disposing of waste in drums and other containers.

EPA conducted a site assessment from June 15 - 19, 2015. EPA conducted a geophysical survey on June 15 - 16, and identified buried anomalies approximately 4 to 10 feet below ground surface (bgs), near the former Treatment Building. During emergency response actions, the former operator provided information that buried materials were present at the location of the former Treatment Building.

On June 18 - 19, 2015, EPA collected samples of soil, sediment, material on the ground surface, and ash from the Drip Pad Building. During the emergency response, EPA collected a sample of particulate matter from the floor of the Wood Stacker Building. EPA screened 25 locations with a x-ray fluorescence detector (XRF) and flame ionization detector (FID). EPA submitted samples from eight locations for metals analysis based on screening results. Additionally, EPA submitted two samples for analysis of volatile organic compounds (VOC) and semi-volatile organic compounds (SVOC). However, VOC and SVOC results were below screening levels.

Analytical results for total metals and Toxicity Characteristic Leaching Procedure (TCLP) metals were compared to January 2015 RML for industrial soil and regulatory criteria for toxicity established in 40 Code of Federal Regulations (CFR) § 261.24.

- Sample HWP-Disposal-3 was collected during the emergency response from particulate matter on the floor of the Wood Stacker Building. In that sample, arsenic was detected at 26.9 milligrams per liter (mg/L), above the toxicity characteristic regulatory level of 5 mg/L.
- Sample HWP-SP01 was collected from material on the ground surface. In this sample, arsenic was detected at 162,000 mg/kg and at 68.3 mg/L. Arsenic was above the RML of 300 mg/kg and the toxicity characteristic regulatory level of 5 mg/L.
- Sample HWP-SP01A was collected from material on the ground surface. In this sample, arsenic was detected at 272,000 mg/kg, which is above the RML of 300 mg/kg.
- Sample HWP-SP2 was collected from ash from the Drip Pad Building. In this sample, arsenic was detected at 4,510 mg/kg, which is above the RML of 300 mg/kg.
- Sample HWP B - I (0-2') was collected from surface soil from the area of the former Treatment Building. In this sample, arsenic was detected at 2,460 mg/kg, which is above the RML of 300 mg/kg.

Two samples met the characteristic for toxicity for arsenic. Three samples contained arsenic in excess of the RML for industrial soil. Arsenic is a hazardous substance as defined by Section 101(14) of CERCLA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA signed an Action Memorandum on August 8, 2015 to conduct the following time-critical removal actions:

- Prepare site plans including a Work Plan, Quality Assurance Project Plan, site-specific Health and Safety Plan (HASP), and an Emergency Contingency Plan;
- Excavate approximately 4,000 tons of soil to a depth of two feet bgs, contaminated material from the floor of the Wood Stacker Building, and ash from the Drip Pad Building;
- Investigate geophysical anomalies to an approximate depth of 10 feet bgs;
- Collect and analyze confirmation samples from the bottom of each excavation;
- Place a visible barrier at the bottom of each excavation;
- Replace excavated soil with clean soil;
- Treat contaminated material with Free Flow 100®, or a similar reagent, prior to disposal;
- Consolidate and package hazardous substances, pollutants and contaminants for transportation and off-site disposal in accordance with the EPA Off-Site Rule, 40 CFR § 300.440; and
- Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA On-Scene Coordinator (OSC) determines may pose an imminent and substantial endangerment to the public health or the environment.

2.1.2 Response Actions to Date

For the period from November 9-13, 2015, EPA:

- Mobilized the Superfund Technical Assessment and Response Team (START) and Emergency and Rapid Response Services (ERRS) contractors and equipment;
- Set up work zones;
- Repaired holes in fencing;
- Established site security;
- Delivered Emergency Contingency Plans to local response agencies;
- Scraped up and containerized highly-concentrated green material on ground near former Treatment Building;
- Began cleanup of fire debris from Drip Pad Building;
- Excavated soil between Treatment Building and Drip Pad Building;
- Excavated soil at location of soil boring HWP B - I (0-2');
- Removed debris from Wood Stacker Building;
- Collected samples from soil stockpile, excavation floors, and Drip Pad Building concrete; and
- Conducted air monitoring for particulates.

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

EPA identified the current property owner and the former operator of the wood treating business. Information on these parties is in the site file.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Pending					

2.2 Planning Section

2.2.1 Anticipated Activities

The following section details anticipated activities.

2.2.1.1 Planned Response Activities

EPA will continue to remove debris from the Wood Stacker Building. Additionally, EPA will begin treating material prior to disposal and investigate geophysical anomalies.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

None

2.3 Logistics Section

The ERRS contractor is providing logistical support.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Lam is responsible for addressing worker health and safety concerns at a response scene, in accordance with 40 CFR § 300.150. Site personnel are working under a site-specific HASP, and attending daily health and safety briefings.

2.5.2 Liaison Officer

Not applicable (NA)

2.5.3 Information Officer

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

EPA is coordinating with the Indiana Department of Environmental Management, Marion County Public Health Department, and Wayne Township Fire Department.

4. Personnel On Site

The following personnel were on-site during the reporting period.

Agency	# Personnel
EPA OSC	1
START	1
ERRS	4

5. Definition of Terms

bgs	below ground surface
CCA	Chromated copper arsenate
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency

ERRS	Emergency and Rapid Response Services
FID	Flame Ionization Detector
HASP	Health & Safety Plan
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NA	Not Applicable
OSC	On-Scene Coordinator
PolRep	Pollution Report
PRP	Potentially Responsible Parties
RML	Removal Management Level
START	Superfund Technical Assessment and Response Team
SVOC	Semivolatile Organic Compounds
TCLP	Toxicity Characteristic Leaching Procedure
VOC	Volatile Organic Compounds
XRF	X-Ray Fluorescence

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, refer to www.epaosc.org/hwptcr.

6.2 Reporting Schedule

Pollution Reports (PolRep) will be submitted periodically.

7. Situational Reference Materials

NA