

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress Report
Hoosier Wood Preservers Time-Critical Removal
C57K
Indianapolis, IN
Latitude: 39.7224100 Longitude: -86.2212300

To:
From: Shelly Lam, On-Scene Coordinator
Date: 12/4/2015
Reporting Period: November 23 - December 4, 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

A summary of analytical results received during the reporting period is below.

- EPA collected confirmation sample HWP-B1Exc-151112 from the bottom of B1 excavation, where high levels of arsenic were found during the site assessment. The confirmation sample had low levels of metals. Arsenic was detected at 8.6 mg/kg.
- EPA collected confirmation sample HWP-Trench-151113 from the bottom of an excavation between the Wood Treatment Building and the Drip Pad Building. EPA excavated soil between the two buildings to a depth of two feet below ground surface (bgs). Confirmation sample results indicated that high levels of arsenic remain at two feet bgs, at a concentration of 610 mg/kg, above the RML of 300 mg/kg.
- EPA collected sample HWP-Exsoil-151113 from the B1 and trench stockpiles for disposal analysis. Arsenic was detected at 0.46 milligrams per liter (mg/L), below the toxicity characteristic level of 5 mg/L. No underlying hazardous constituents were detected.
- EPA collected sample HWP-DPconcrete-151113 from the Drip Pad Building concrete for disposal analysis. Arsenic was detected at 6.3 mg/L and chromium was detected at 23.8 mg/L, both above the toxicity characteristic levels of 5 mg/L.
- HWP-A2UST-151116 was collected from liquid in a vault under the former Treatment Building. Arsenic was detected at 50.2 mg/L. Low levels of barium, cadmium, chromium, lead, and methylene chloride were detected.
- HWP-FTBsoil-151116 was collected from soil and debris excavated from the former Treatment Building for disposal analysis. Arsenic was detected at 16.2 mg/L, above the toxicity characteristic level. Pentachlorophenol was detected at 107 mg/kg.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA signed an Action Memorandum on August 8, 2015 to conduct time-critical removal actions including excavating 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; investigating geophysical anomalies to an approximate depth of 10 feet bgs; treating contaminated material with Free Flow 100®, or a similar reagent, prior to disposal; 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; and

2.1.2 Response Actions to Date

For the reporting period, EPA:

- Collected one confirmation sample from the Wood Stacker Building; one sample from backfill material to be used on-site; and four samples for disposal analysis;
- Continued breaking up and removing concrete from the Drip Pad Building;
- Completed removal of soil and particulate matter from the Wood Stacker Building;
- Treated particulate matter and soil from the Wood Stacker Building with EnviroBlend HDX;
- Pumped 340 gallons of arsenic-contaminated liquid from a vault in the former Treatment Building; 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>
Non-hazardous charred wood and debris	Solid	65 tons	NA	NA	Southside Landfill, Indianapolis, IN
Scrap metal	Solid	6 tons	NA	NA	Recycled at Omni Source, Indianapolis, IN

2.2 Planning Section

2.2.1 Anticipated Activities

The following section details anticipated activities.

2.2.1.1 Planned Response Activities

EPA will begin continue excavating, removing, and disposing of contaminated materials.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

None

2.3 Logistics Section

The Emergency and Rapid Response Services (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

On-Scene Coordinator (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 health and safety plan, 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
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

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

PolReps will be submitted periodically.

7. Situational Reference Materials

