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 #4**
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: 12/11/2015
Reporting Period: December 7-11, 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.

- HWP-FillSoil-151202, collected from backfill material to be used on-site, was tested for metals, volatile organic compounds (VOC), and semivolatile organic compounds (SVOC). All results were below residential RMLs.
- EPA collected confirmation sample HWP-SBsoil-151201 from the bottom of the excavation in the Wood Stacker Building. Metals were below residential RML.
- Sample HWP-FTBvault-151203 was collected from liquids in the former Treatment Building vault. The sample was analyzed for polychlorinated biphenyls (PCB). PCBs were not detected.
- Because pentachlorophenol (PCP) was detected as an underlying hazardous constituent in the disposal sample collected from soil in the former Treatment Building area, the disposal facility requested dioxin and furan analysis. Commercial grades of PCP contain small amounts of dioxins and furans as impurities. It is thought that additional dioxins might be generated by heating PCP solutions. HWP-FTBsoil-151116 was submitted for dioxin and furan analysis. Several dioxins and furans were detected above the universal treatment standards (UTS).
- EPA collected sample HWP-FTBCONC-151204 for disposal analysis from concrete in the former Treatment Building. Arsenic was detected at 0.27 milligrams per liter (mg/L) and chromium was detected at 30.8 mg/L. Chromium was above the toxicity characteristic level of 5 mg/L. Total and toxicity characteristic leaching procedure (TCLP) SVOC and VOC were non-detect. Sample HWP-FTBCONC-151201 was analyzed for dioxin and furan analysis. 1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin and total hexachlorodibenzofurans were detected above the UTS.

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.

2.1.2 Response Actions to Date

For the reporting period, EPA:

- Collected one confirmation sample and two samples for disposal analysis;
- Continued breaking up and removing concrete from the Drip Pad Building;
- Began transportation and disposal of concrete from the Drip Pad Building. Concrete is being transported to Envirosafe in Oregon, Ohio for encapsulation;
- Treated soil from the former Treatment Building with EnviroBlend HDX;
- Began backfilling the Wood Stacker Building and former Treatment Building excavations; 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

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Non-hazardous charred wood and debris	Solid	82.54 tons	NA	NA	Southside Landfill, Indianapolis, IN
Scrap metal	Solid	6 tons	NA	NA	Recycled at Omni Source, Indianapolis, IN
RQ, UN3077, Hazardous Waste Solid, NOS (chromium, arsenic), 9, PGIII (concrete)	Solid	113.54 tons	Various	Encapsulation	Envirosafe, Oregon, OH

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 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 Code of Federal Regulations (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	5

5. Definition of Terms

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
PCB	Polychlorinated Biphenyls
PCP	Pentachlorophenol
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
UTS	Universal Treatment Standards
VOC	Volatile Organic Compounds

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