

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Southern Avenue Container Dump - Removal Polrep  
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #2  
Final Polrep  
Southern Avenue Container Dump  
  
Memphis, TN  
Latitude: 35.1150104 Longitude: -89.9450191

**To:** Steve Goins, TDEC

**From:** Steve Spurlin, OSC

**Date:** 2/4/2016

**Reporting Period:** October 29, 2015 to November 23, 2015

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B46V	<b>Contract Number:</b>	EP-S4-15-04
<b>D.O. Number:</b>	032	<b>Action Memo Date:</b>	11/11/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/29/2015	<b>Start Date:</b>	10/29/2015
<b>Demob Date:</b>	11/23/2015	<b>Completion Date:</b>	11/23/2015
<b>CERCLIS ID:</b>	TNN000404505	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	1131926	<b>State Notification:</b>	10/29/15
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

The incident is an emergency response to abandoned containers containing suspected hazardous substances.

#### 1.1.2 Site Description

The Site is located in a commercial area of Memphis, Tennessee. Containers were placed on the ground between two unoccupied commercial buildings. Access to the area is unrestricted, and the area is frequented by the homeless and trespassers.

##### 1.1.2.1 Location

The containers were abandoned outside the unoccupied business located at 3517 Southern Avenue, Memphis, Shelby County, Tennessee. The coordinate location of the containers is 35 degrees 06 minutes 54.39 seconds North and 89 degrees 56 minutes 41.67 seconds West.

##### 1.1.2.2 Description of Threat

Thirty-six five gallon capacity containers were abandoned at the property by an unknown party. The containers have a black liquid and solid on the outside of the containers. The containers pose a threat to release their contents into the environment as the containers degrade due to weather or damage from vandalism. Access to the area is unrestricted and frequently traversed by the public, which increases the threat of human exposure by contact to the suspected hazardous substances.

##### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During a visit to the property on October 28, 2015, the U. S. Environmental Protection Agency (EPA) discovered the containers, which had not been located at the site during previous visits.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

On October 28, 2015, the EPA initiated an emergency response to the incident. The EPA contractor, CMC Environmental Services, Inc., was contacted to respond to the Site on October 29, 2015.

### 2.1.2 Response Actions to Date

On October 29, 2015, EPA and the EPA contractor responded to the Site. A work area was established by placing plastic on the ground. The containers were opened and poured into 55 gallons drums. The waste consolidation resulted in the generation of 2.5 drums of black liquid material. The material was sampled for waste characterization to allow for future disposal. While at the Site, a small pile of material, possibly acoustic tiles, was observed. A sample of the material was collected to be evaluated for asbestos. The pile was covered with plastic.

After obtaining analytical results for the waste sample, bids for transport and disposal were obtained. On November 23, 2015, EPA met the transporter, American Environmental, at the Site. The waste liquids from the 3 drums were pumped into a vacuum truck and transported to the Heritage-Crystal Clear facility in Memphis, TN. The material will be used for future fuel blending. The empty drums were removed. The sample results for the suspected asbestos material were non-detect for asbestos, and the material was left at the property.

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

The containers were dumped by an unknown party. No information related to a responsible party was observed on the containers.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
waste oil	liquid	120 gals.	NA	recycle	Heritage-Crystal Clean, Memphis, TN

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Waste removal is complete and no further actions are anticipated.

#### 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.