U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
JCC Environmental - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #8**
Staging of Mercury and Survey of RAD Wastes
JCC Environmental

Picayune, MS
Latitude: 30.4802957 Longitude: -89.6934641

To:
From: Brian Englert, On Scene Coordinator
Date: 5/27/2016
Reporting Period: 5/26/2016

1. Introduction

1.1 Background

Site Number:	B48J	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	5/19/2016
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	5/19/2016	**Start Date:**	5/20/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:	MSN000404848	**RCRIS ID:**	
ERNS No.:		**State Notification:**	5/10/2016
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Response.

1.1.2 Site Description

Former used oil and waste recycling facility.

1.1.2.1 Location

137 J J Holcomb Rd, Picayune (Nicholson), Pearl River County, Mississippi

1.1.2.2 Description of Threat

Site is comprised of used oil and other oil materials stored in totes and drums which are leaking in an unsecured building and migrating to the ground outside. Spilled elemental mercury has been found scattered in an open and unsecured area. Abandoned aboveground storage tanks containing waste oil are located in a secondary containment area which has filled with rainwater, the freeboard is undetermined. The secondary containment areas contain oil saturated sorbents and there is a sheen on the trapped water. There are residences within 50-100 feet outside the fence line on three sides of the facility. A small creek flows on the southern border of the facility and a stream on the northern border. Access to the property, its buildings, and their contents is unsecured.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Mississippi Department of Environmental Quality (MDEQ) requested that EPA Emergency Response, Removal and Prevention Branch (ERRPB) conduct a removal site evaluation (RSE) at the JCC Environmental Site. The business filed bankruptcy in 2013 and was subsequently abandoned. EPA OSC Huyser met with MDEQ and one of the former JCC Environmental partners on May 17, 2016, to walk through and inspect the facility. Approximately 150 drums and 100 totes were found, most of which were full or at least partially filled and some of which were leaking. Contents of the full containers mostly appeared to be oil. Buckets marked corrosive and universal waste were found, some of which reportedly contained liquid elemental mercury waste. The former partner indicated that vandals may have broken instruments

containing mercury on the floor of one building.

There are three buildings located at the Site. The north building is closed and contains only a few drums, totes, and buckets. The west building is open and contains a majority of the drums and totes. The south building is office space. There are two above-ground storage tanks (ASTs) at the site with capacities in excess of 10,000-gallons each. Thermal imaging suggests that one tank is approximately 20% full while the other has a liquid level of only 12 inches. The tanks are within a shallow secondary containment area that is filled with rainwater and has a sheen on the surface. There are drums and totes within the secondary containment area as well.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An earlier assessment determined that there are two radiation sources (thorium oxide and thorium nitrate) in the chemical storage area located in the south east corner of the north building. While containers for both Thorium oxide and thorium nitrate are intact, both of these sources are solids which when disturbed may present an exposure or inhalation hazard. MSDSs for thorium oxide and thorium nitrate recommend use of air-purifying respirators. Additionally, there are several unlabeled containers in the room. For this reason it was determined that an additional survey should be conducted of the area.

A Multirae pro with a gamma sensor and a Ludlum Geiger Counter with a 449 probe were used to conduct an additional RAD survey of the chemical storage area on May 26th. Only the walls and windows external to the southeast room were surveyed and no entry into the room itself was made. It should be noted that many of the unlabeled containers are stored on the window seals and near the north west door to the room. 19 urem/hr and 200 cpm were observed at the wall port to the north side of the room. 51 urem/hr and 500 cpm were observed at the bottom right corner of the closed door to the west side of the room. It should be noted that the thorium oxide and thorium nitrate containers are in close proximity to this door. Background readings (<100 cpm and 3 urem/hr) were observed at the external windows to the south and east side of the room were a number of the unlabeled containers are stored.

At the present time, the containers of radioactive wastes are not compromised and present no threat of immediate release. Vendors contacted for disposal requested a dose rate for disposal. After consulting Region 4 radiation experts and health and safety personnel, it has been determined that an additional instrument (Ludlum Model 19) should be used to determine the dose rate and that these sources can be addressed at a later date or during a time critical removal being planned. Additional planning time will be used to determine how to properly do an entry to relocate, stabilize and dispose of these wastes. The room has been secured and the radiation sources will be addressed at a later date.

Crews completed sampling, stabilization and staging of almost all wastes in the north and west buildings. Empty totes containing only residual materials have been stored under an overhang on the north side of the west building. At this time EPA, START and ERRS have stabilized and staged almost all wastes in and around the west and north buildings. While doing so an additional estimated 15 to 20 lbs of containerized elemental mercury was recovered. Containers were overpacked and staged with additional elemental mercury wastes. Transportation and disposal of all elemental mercury will occur on 5/27/2016. All other wastes will be staged onsite for disposal at a later date. It is anticipated that EPA, START and ERRS will demobilize on 5/27/2016.

2.1.2 Response Actions to Date

- Elemental mercury wastes have been staged for transportation and disposal
- Activities in the west building are nearly complete
- Cleared debris from north building
- Began cleaning sumps in north building
- Began staging drums in north building
- Delineated extent of spilled mercury contamination
- Continued cataloging containers & sampling containers onsite
- Completed cataloging containers & sampling containers in west building
- Cleared debris from west building
- continued staging catalogued and sampled drums and totes in west building
- Completed removal of wastewater from secondary containment area
- Completed pumping, removal and staging of wastes in the tank farm
- Completed decontaminating mercury-contaminated area
- Completed removal and decontamination of mercury-contaminated drums
- Continued hazard categorization
- Completed sludge removal from secondary containment area
- Completed removing piping from tank farm

Completed work in the tank farm

2.1.2.1 Current Container Count

Location	***Count (=>5 gal)***	***Complete?***
North Building	66	Yes
West Building	260	No

Tank Farm	17	No
Outside	139	Yes

Size	***Count***
Drums (20-75 gal)	314
Totes (220-500 gal)	116
Buckets (5 gal)	50

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
The former partner declared that there were no available funds associated with the business to conduct the response and there were no other fund sources to undertake the action. Written access to conduct the response was not granted until May 18.

2.1.4 Progress Metrics

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Petroleum Contact Water	Secondary Containment Area	5025 gal	1605647-01	Liquid Environmental Solutions	
Petroleum Contact Water	Secondary Containment Area	4735 gal	1605647-02	Liquid Environmental Solutions	

2.2 Planning Section

2.2.1 Anticipated Activities

Primary objectives will be evaluating safe working and operating conditions at the site, initial cleaning of spilled waste materials, securing containers and assessing the contents of each, then segregating by waste streams for later disposal.

2.2.1.1 Planned Response Activities

- Screen working areas to delineate potential mercury contamination; (COMPLETE)
- Catalog and document all containers throughout the Site and stage in a secure location to await disposal; (ONGOING)
- Overpack or repackage materials from leaking containers; (ONGOING)
- Sample waste materials for hazard categorization and profiling for treatment and/or disposal; (ONGOING)
- Remove free liquids and wastes from secondary containment area; (COMPLETE)
- Remove liquids and sludges from above-ground storage tanks and decontaminate, if necessary; (COMPLETE)
- Excavate stained soils resulting from previous on-site spills (COMPLETE);
- Perform additional surface and soil screening for additional contaminant hazards, if necessary;
- Perform air monitoring for on-site health and safety; (ONGOING)
- Treat and/or dispose of waste materials from the Site. (ONGOING)

2.2.1.2 Next Steps

Complete transfer liquids from broken/leaking totes to stable containers and stage in north and west buildings. Dispose of staged wastes.

2.2.2 Issues

No new information to report in this section at this time.

2.3 Logistics Section

OSC Englert arrived on 5/24 to relieve OSC Huyser who will demobilize on 5/25.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Englert, KEMRON and START are providing safety support.

2.5.2 Liaison Officer

No additional information to report in this section at this time.

2.5.3 Information Officer

No information to report in this section at this time.

3. Participating Entities

3.1 Unified Command

No information to report in this section at this time.

3.2 Cooperating Agencies

MDEQ

4. Personnel On Site

EPA (1)

ERRS (10)

START (2)

MDEQ (as available)

5. Definition of Terms

No information to report in this section at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/JCCenvironmental

6.2 Reporting Schedule

No information to report in this section at this time.

7. Situational Reference Materials

www.epaosc.org/JCCenvironmental