

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Bethel Avenue Paint Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Bethel Avenue Paint Site
C5AY
Indianapolis, IN
Latitude: 39.7413735 Longitude: -86.1103400

To: Jason Doerflein, Marion County Public Health Dept
Blake Harvey, Indianapolis Fire Department
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Valencia Darby, U.S. DOI
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Rex Osborn, IDEM

From: Jason Sewell, On Scene Coordinator

Date: 11/18/2016

Reporting Period: 11/14/2016 to 11/18/2016

1. Introduction

1.1 Background

Site Number:	C5AY	Contract Number:	EP-S4-16-02
D.O. Number:	BA5-12	Action Memo Date:	8/29/2016
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	N/A
Mobilization Date:	10/31/2016	Start Date:	10/31/2016
Demob Date:		Completion Date:	
CERCLIS ID:	INN000506173	RCRIS ID:	INR000142760
ERNS No.:	N/A	State Notification:	IDEM Notified
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-critical removal action - closed paint store, abandoned wastes

1.1.2 Site Description

1.1.2.1 Location

The Bethel Avenue Paint Site is located at 3150 Bethel Avenue, Indianapolis, Marion County, IN (39.741283 latitude, -86.110395 longitude). The Site includes an old shopping strip mall of approximately 20,000 square feet in size. The mall is divided into eight store fronts of which paint wastes were abandoned in 4 storefronts (suites). The Site is owned by a religious organization (Church) whose information is recorded in the Site file.

The Site is located in a mixed use area southeast of downtown Indianapolis. The population within a half mile is approximately 9,457 people. The Site is bordered on the north by a low income neighborhood (former Habitat for Humanity target area), on the east by a religious center and school, on the south by residential housing and on the west by a cemetery and city park. The nearest waterway is Bean Creek approximately 0.5 miles to the southeast. Bean Creek is a tributary of Pleasant Run and White River.

1.1.2.2 Description of Threat

The threat of release of hazardous substances or pollutants or contaminants is present at the Site. Thousands of gallons of paint, stains and other coatings products were abandoned at the Site. The wastes include containers with hazard markings for: flammable, corrosive, toxic or poisonous. Breaking and entering and trespassing in the site building has occurred. Electrical wiring has been partially removed and electrical service related fire hazards are located at the Site. A fire at the Site could lead to the offsite transport of hazardous substances, pollutants or contaminants by fire, smoke and wind action. Waste spills are present on the floor in the Site. Storm water drains are located on the Site. Storm water or fire

suppression water runoff at the Site could enter storm water drains and discharge to Bean Creek approximately 0.5 miles away.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On February 29, 2016, EPA conducted an initial site visit with representatives from the Church, Indianapolis Fire Department (IFD), Marion County Public Health Department (MCPHD) and Indiana Department of Environmental Management (IDEM). The Church representative has maintained locked doors at the Site; however, doors and windows had been broken out and doors and subsequently boarded by MCPHD to prevent access.

EPA observed tall stacks and piles of paints, stains and other coating materials inside the Site building. Three of four suites containing paints and stains were filled with containers such that little to no space was left for a walkway. The roof was open or collapsing in areas and containers were subject to precipitation and weathering. Rusted and leaking metal containers were present. Spilled materials were visible on the floor. Containers included small cans up to 5-gallons and rusting metal cans and containers with damaged or missing labels. Container labels that were present included markings for flammable liquids, corrosives and poison or toxic materials.

The IFD representative identified electrical wiring in the building had been dismantled and temporary lighting had been installed. The temporary wiring included open wiring junctions that do not meet fire code requirements and would be a potential fire hazard if the lines were energized with electricity. The Church representative advised that the Church does not have the financial resources to stabilize the storage conditions or dispose of the abandoned wastes.

IFD, MCPHD and IDEM verbally requested EPA assistance for the removal of hazardous substance at the Site.

On March 1, 2016, IFD notified EPA that a (fire fighting) Hazard File had been established for the Site. The Hazard File states that the Site building has no working fire alarm or sprinkler system, contains large quantities of oil based paints and stains, and a working fire at the Site would present a clear danger to fire fighters.

On March 4, 2016, MCPHD submitted a written request for EPA assistance for the disposal of hazardous substances at the Site. The request stated the Site contains large amounts of hazardous substances, unknown substances and possible public safety and environmental threats.

On March 5, 2016, IDEM submitted a written referral of the Site to EPA for a removal action. The referral stated the Site contains hundreds of containers of 5-gallons or less and a building roof that is collapsing and IDEM does not have the resources to conduct the removal action.

On April 22 and May 27, 2016, EPA and EPA's Superfund Technical Assessment and Response Team (START) contractor conducted an assessment at the Site. The assessment included collection of liquid samples for lab analysis and a container inventory. A site assessment report summarizes findings of the assessment. A total of nine liquid samples, including two duplicates, were collected during the assessment. The analytical results documented:

- Samples BP-1, BP-3, BP-7 and BP-8 had the pH of (standard units): 1.57; 13.5; 1.61; and 0.54. These results exhibit the characteristic of corrosivity as defined by 40 C.F.R. § 261.22.
- Samples BP-1 and BP-2 had flashpoint temperatures of 102 and 112 degrees Fahrenheit. These results exhibit the characteristic of ignitability as defined by 40 C.F.R. § 261.21.
- Sample BP-9 documented the presence of the hazardous substances benzene and methyl ethyl ketone at 27 parts per million (ppm) and 290 ppm, respectively.

START conducted an inventory of containers on May 27th, 2016. START documented approximately 2,520 quarts, 6,858 gallon containers, and 1,175 5-gallon containers of paint, stains, sealers, and strippers.

On October 31, 2016, EPA and EPA contractors began a removal action at the Site and START began documenting various hazardous substances on container labels at the Site. As of this report, the following hazardous substances have been noted:

- Benzene
- Ethylbenzene
- Toluene
- Xylene (mixed isomers)
- 1,2,4 Trimethylbenzene
- 2-Butanone (methyl ethyl ketone / MEK)
- Methyl Isobutyl Ketone
- Acetone
- n-Butyl Acetate
- Hexavalent Chromium
- Methanol
- Manganese Chloride Hydrate
- Sodium Bichromate
- Hydrochloric Acid
- Phosphoric Acid
- Sulfuric Acid (D002)
- Liquids meeting the characteristic for corrosivity, including liquids with pHs of 1 standard units (SU) and 13 SU (D002)

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.1.1 Current situation

EPA has mobilized ERRS and START contractors to conduct a time-critical removal action. The following plans govern removal actions at the Site:

- Emergency Contingency Plan (shared with public safety agencies)
- Site-specific health and safety plan (including daily safety meetings)
- Air Monitoring Plan
- Work Plan

Work hours are daily from 7AM to 5:30 PM. No work will be conducted overnight, on weekends or Federal holidays. Private security monitors the Site during non-working hours. The removal action is estimated to last five to seven weeks, including all process from preparing wastes for offsite transportation to the actual removal of wastes from the Site.

2.1.2 Response Actions to Date

For the week of November 14 through November 18, 2016

- Completed removal of wastes from Suite 3146.
- Began removal of wastes from Suites 3142 and 3138.
- Waste disposal profiling with approved disposal facility continues.
- Wastes were brought outside the building, segregated and boxed by waste types / waste profile.
- Wastes were staged in temporary on-site shelter pending scheduling for offsite transportation.
- As of this period, three semi-truckloads of wastes have been shipped offsite for disposal, including shipments on: November 9, November 15, and November 18, 2016. All three of the shipments consisted of: 12 cubic yard boxes of flammable wastes (oil based) and 12 cubic yard boxes of non-hazardous wastes (latex based), for a total of 36 cubic yard boxes of flammable wastes and 36 cubic yard boxes of non-hazardous wastes transported offsite for disposal thus far.
- Continued gathering information on hazardous substances at the Site.
- Continued searching for information on potential responsible parties.

START is conducted air monitoring for volatile organic compounds (VOC) in accordance with the Site Air Monitoring Plan. Monitoring is performed at the Site perimeter and work areas at various times during working hours. Perimeter readings are taken at four locations, including one upwind location and three downwind locations. Work area monitoring is conducted in the immediate work area five times a day, once before work begins, twice in the morning and twice in the afternoon.

For this operational period, air monitoring at the perimeter has documented that peak readings have not exceeded 0 parts per million (ppm). Peak readings in the work area within the Site building were up to 18.21 ppm. The elevated peak reading for the work area was due to oil based paint cans breaking open. Spills would be absorbed, vapors vented with fans and VOC readings were lowered.

<i>Air Monitoring Peak Readings</i>	
<i>November 14 to November 18</i>	
<i>Activity</i>	<i>Peak Reading</i>
Perimeter Air Monitoring	0 ppm
Work Area Monitoring	18.21 ppm

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

EPA has assembled an enforcement team consisting of the OSC, an enforcement specialist and attorney. The team has identified one potentially responsible party and issued a General Notice Letter. The team continues to collect information on two additional parties.

2.1.4 Progress Metrics

<i>Waste Generated Table</i>				
<i>Waste Stream</i>	<i>Medium</i>	<i>Total Generated to Date</i>	<i>Total On-Site</i>	<i>Total Shipped to Date</i>
Hazardous Liquids (oil based)	Liquid	58 x 1 cubic yard boxes	17 x 1 cubic yard boxes	36 x 1 cubic yard boxes
Non-hazardous Liquids (water based)	Liquid	59 x 1 cubic yard boxes	20 x 1 cubic yard boxes	36 x 1 cubic yard boxes
Hazardous Liquids (Catalyzed)	Liquid	9 x 1 cubic yard boxes	9 x 1 cubic yard boxes	0

Solid Waste	Solid	3 x 20 yard roll off dumpster	1 x 20 yard roll off dumpster	2 x 20 yard roll off dumpster
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Waste Off-Site Transportation and Disposal Table					
Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Hazardous Liquids (oil based)	Liquid	12 x 1 cubic yard boxes	016566969JJK	Solvent recovery / Fuels blending	Chemtron Avon, Ohio
		12 x 1 cubic yard boxes	016567018JJK		
		12 x 1 cubic yard boxes	016567094JJK		
Non-hazardous Liquids (water based)	Liquid	12 x 1 cubic yard boxes	016566969JJK	Solidification	Chemtron Avon, Ohio
		12 x 1 cubic yard boxes	016567018JJK		
		12 x 1 cubic yard boxes	016567094JJK		
Solid Waste	Solid	2 x 20 yard roll off dumpster	NA	NA	Twin Bridges Landfill Danville, Indiana

2.2 Planning Section

2.2.1 Anticipated Activities

Wastes will be re-packaged and bulked as necessary to prepare for offsite shipping in accordance with U.S. DOT shipping standards. All waste will be characterized and disposal options will be determined in accordance with EPA Offsite Rule 40 C.F.R. § 300.440; All waste will be transported to an EPA approved offsite disposal facility. Any other response actions will be taken to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

- Finalize removal of wastes from Suite 3142 and 3138.
- Conduct hazard categorization (HAZCAT) of unlabeled or unknown materials as necessary to arrange for waste disposal.
- Conduct bulking of waste as necessary.
- Waste shipments are scheduled for: November 22 and 24, and December 1.
- Maintain site security during non-working hours.

2.2.2 Issues

Many paint cans in the 3142 and 3138 suites are rusted and leaking. As some cans are moved, the cans are falling apart and causing additional spillage.

2.3 Logistics Section

The EPA ERRS contractor is arranging for all logistics needs at the Site.

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

On September 20, 2016, EPA issued Task Order BA5-12 to Environmental Restoration LLC under Contract EP-S4-16-02. The Task Order included a scope of work to remove and properly dispose of wastes from the Site. The ceiling funding amount for the Task Order was \$200,000.

On September 14, 2016, EPA issued a Technical Directive Document (TDD) to SRS LLC under the Superfund Technical Assessment and Response Team (START) contract. The TDD included a ceiling funding amount for \$65,000.

Estimated Costs *

		Total To	%
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	Budgeted	Date	Remaining	Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$118,818.00	\$81,182.00	40.59%
TAT/START	\$65,000.00	\$9,866.00	\$55,134.00	84.82%
Intramural Costs				
USEPA - Direct	\$40,000.00	\$14,700.00	\$25,300.00	63.25%
Total Site Costs	\$305,000.00	\$143,384.00	\$161,616.00	52.99%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC is responsible for safety at the Site. The ERRS Response Manager serves as Safety Officer for the Site. A site health and safety plan has been established and signed by all site workers.

2.5.2 Liaison Officer

The OSC serves as Liaison Officer for the Site.

2.5.3 Information Officer

The OSC serves as Information Officer for the Site.

3. Participating Entities

3.1 Unified Command

EPA

3.2 Cooperating Agencies

Indianapolis Fire Department
Marion County Public Health Department
Indiana Department of Environmental Management

4. Personnel On Site

EPA: 1
START: 1
ERRS: 5

5. Definition of Terms

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
EPA Environmental Protection Agency
ERRS EPA's Emergency and Rapid Response Services contractor
NA Not Applicable
OSC On-Scene Coordinator
PolRep Pollution Report
PRP Potentially Responsible Party
START EPA's Superfund Technical Assessment and Response Team contractor

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, please refer to "Documents" on https://www.epaosc.org/site/site_profile.aspx?site_id=11479

6.2 Reporting Schedule

The next Polrep will be submitted on November 23, 2016.

7. Situational Reference Materials

NA

POLREP #3 Last Updated 11/21/2016