

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Final POLREP
Bethel Avenue Paint Site

Indianapolis, IN
Latitude: 39.7413735 Longitude: -86.1103400

To:

From: Jason Sewell, On Scene Coordinator

Date: 12/1/2016

Reporting Period: 11/28/2016 to 12/01/2016

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:	12/1/2016	Completion Date:	12/1/2016
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 paint related 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 included an old shopping strip mall of approximately 20,000 square feet in size. The mall was 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 was present at the Site. Thousands of gallons of ignitable wastes (oil base paints, stains and resins), corrosive wastes (acids, caustics) and other coatings products were abandoned at the Site. The wastes included containers with the hazard labels: flammable, corrosive, toxic or poisonous.

Breaking and entering and trespassing in the Site building had occurred. Electrical wiring was partially removed from the Site building causing fire hazards in areas where ignitable, oil based wastes were stored. Containers of wastes were severely corroded and crushed under large piles and spills of ignitable wastes were pooled on the floor. A fire at the Site could lead to the offsite transport of hazardous substances, pollutants or contaminants by fire, smoke and wind action and by surface runoff. Storm water drains are located adjacent to the Site building. Storm water runoff flows to Bean Creek approximately 0.5 miles away.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On February 29, 2016, the EPA On-Scene Coordinator (OSC) 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 maintained locked doors at the Site; however, doors and windows had been broken out and doors and subsequently boarded by MCPHD to prevent unauthorized access.

During the site visit, the OSC 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 walking through the Suite. 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. (During removal actions, EPA later confirmed electrical wiring was still energized where ignitable waste spills were stored.)

During the February 29, 2016 site visit, 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. The following hazardous substances were noted on container labels:

- 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 [Chromium(VI)]
- Methanol
- Manganese chloride (MnCl₂), tetrahydrate
- Sodium dichromate
- 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

On October 31, 2016, EPA mobilized ERRS and START contractors to conduct a time-critical removal action. The following plans governed removal actions at the Site:

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

Removal actions were conducted weekdays from 7AM to 5:30 PM. No work was conducted overnight, on weekends or during Federal holidays. Private security services monitored the Site during all non-working hours. The removal action lasted five weeks and concluded when the final shipment of waste was transported offsite December 1, 2016.

2.1.2 Response Actions to Date

For actions conducted prior to this period, see prior Pollution Reports (POLREP) at www.epaosc.org/bethelavepaint.

For the week of November 28 through December 1, 2016:

- All paint related waste containers were removed from the Site building, including Suites: 3150, 3146, 3142, and 3138.
- Paint related waste spills in the Suites were absorbed and placed into waste containers for disposal.
- Waste disposal profiles were established for all waste streams.
- Wastes were segregated by waste stream, labeled and staged in a temporary on-site shelter pending offsite transportation.
- Two semi-truckloads of wastes were shipped offsite for disposal on: November 29 and December 1, 2016.
- The Site was secured 24 hours a day until all wastes were shipped offsite.
- EPA and EPA contractors demobilized from the Site.

The OSC conducted air monitoring for volatile organic compounds (VOC). For this operational period, peak readings in the work area within the Site building were up to 3.50 ppm.

Air Monitoring Peak Readings	
November 28 to December 1	
Activity	Peak Reading
Perimeter Air Monitoring	0 ppm
Work Area Monitoring	3.50 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

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
Contaminant(s) of Concern	Number of workers on site	7
Oil Response Tracking		
Estimated volume	Initial amount released	NA
	Final amount collected	NA
	FPN Ceiling Amount	NA
CANAPS Info	FPN Number	NA
	Body of Water affected	NA
Administrative and Logistical Factors (Place X where applicable)		
Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
x More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
Criminal Investigation Division involved	Extreme weather or abnormal field season	x Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year	Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	199.69	gallons
Unleaded Fuel Used	719.51	gallons
Alternative/E-85 Fuel Used	0	gallons
Electricity from electric company	0	kWh
Electric Company Name and Account #	NA	
Electricity from sources other than the electric company	8500	kWh
Solid waste reused	NA	NA
Solid waste recycled	NA	NA
Water Used	50	gallons

Waste Metrics Table					
Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Ignitable Paint Related Waste (D001, 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		
		14 x 1 cubic yard boxes	016567127JJK		
		14 x 1 cubic yard boxes	016567154JJK		
		3 x 1 cubic yard boxes	016567190JJK		
		12 x 1 cubic yard boxes	016566969JJK		
		12 x 1 cubic yard boxes	016567018JJK		

Water Based Paint Related Waste	Liquid	12 x 1 cubic yard boxes	016567094JJK	Solidification and landfilling	Chemtron Avon, Ohio
		12 x 1 cubic yard boxes	016567127JJK		
		14 x 1 cubic yard boxes	016567154JJK		
		6 x 1 cubic yard boxes	016567190JJK		
Solid Waste	Solid	3 x 20 cubic yard roll off dumpster	NA	NA	Twin Bridges Landfill Danville, Indiana
Ignitable Resin / Catalyst Related Waste (D001)	Liquid	10 x 1 cubic yard boxes	016567190JJK	Incineration	Chemtron Avon, Ohio
Ignitable Paint Related Waste containing Zinc (D001)	Liquid	2 x 55 gallon drums	016567190JJK	NA	Chemtron Avon, Ohio
Ignitable Amine-containing Catalyst Related Waste (D001)	Liquid	1 x 55 gallon drum	016567190JJK	NA	Chemtron Avon, Ohio
Phosphoric Acid (D002)	Liquid	1 x 55 gallon drum	016567190JJK	NA	Chemtron Avon, Ohio
Corrosive Waste containing Hydrochloric Acid and Hexavalent Chromium (D002)	Liquid	1 x 55 gallon drum	016567190JJK	NA	Chemtron Avon, Ohio
Sulfuric Acid (D002)	Liquid	1 x 55 gallon drum	016567190JJK	NA	Chemtron Avon, Ohio
Corrosive Waste (D002, peel away stripper)	Liquid	1 x 55 gallon drum	016567190JJK	NA	Chemtron Avon, Ohio
Sodium Hydroxide (D002)	Liquid	1 x 5 gallon bucket	016567190JJK	NA	Chemtron Avon, Ohio
Ignitable Paint Related Waste containing Aluminum (D001)	Liquid	1 x 5 gallon bucket	016567190JJK	NA	Chemtron Avon, Ohio

2.2 Planning Section

2.2.1 Anticipated Activities

Removal actions have been completed, no further actions anticipated.

2.2.2 Issues

NA

2.3 Logistics Section

The EPA ERRS contractor arranged for all logistics needs during removal actions.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC was responsible for safety at the Site. The ERRS Response Manager served as Safety Officer for the Site. A site health and safety plan was been established and signed by all site workers. Daily safety meetings were conducted prior to beginning work.

2.5.2 Liaison Officer

The OSC served 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: 0
ERRS: 3

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

This POLREP is the Final POLREP. No further updates are anticipated.

7. Situational Reference Materials

NA