

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, October 27, 2005

From: Terry Stilman

Subject: POLREP 1 Enforcement Start

Moss Soap and Chemical Enforcement
6890 and 6900 NW 35th Avenue, Miami, FL

POLREP No.:	1	Site #:	A47PBB
Reporting Period:	10/9/05 - 10/22/05	D.O. #:	
Start Date:	10/9/2005	Response Authority:	CERCLA
Mob Date:	10/9/2005	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

The Moss Soap and Chemical Company manufactured industrial and janitorial cleaning supplies. Raw material was combined at the facility and re-packaged for sale. Throughout its years of operation, some product lines were no longer carried, resulting in the accumulation of various chemicals. These chemicals were stored throughout the building in drums and other containers. The facility first came to the attention of EPA after a safety audit conducted by Dade County Fire. Deteriorating drums and containers and leaking chemicals were found at the facility. The building was also in poor condition, with large holes in the roof and corroded support beams. The County requested EPA assistance.

On February 21, 2002 OSC Stilman and DERM conducted a removal assessment at the Site. EPA and DERM found deteriorated and leaking drums, water reactive chemicals exposed to rain through holes in the facility roof and unknown releases on the ground outside the facility in various locations. DERM issued notice of violations to the owner to address the on-going releases and EPA and DERM contacting the Florida Department of Environmental Protection with regard to possible action inside the then active facility. Over the next week DERM directed the clean-up of the ground releases and monitored the condition of the facility.

On February 28, 2002 DERM and Dade County Buildings Department conducted a follow-up inspection. Conditions in the building were further documented and the structure of the facility was inspected. After the inspection, Dade County Buildings department declared the building unsafe and ordered all operations to cease. Dade County did allow however, the owner to remove usable product from the building. At that time DERM began regular patrols of the facility. On March 04, 2002 EPA contacted the facility owner to discuss the need for immediate clean-up of building. Despite EPA and County requests no clean-up of the building was conducted. Based on the continuing threat of release, on March 14, 2002 OSC Stilman activated ERRS to assist with Site clean-up.

On March 14, 2002, OSC Stilman initiated a removal action at the facility. On March 18, the facility owner signed an access agreement with EPA permitting EPA access to the facility to stabilize the leaking containers and move the containers to more secure locations in the facility. On 21-MAR-02 OSC Stilman and ERRS arrived on-scene to stage leaking containers. ERRS transferred and segregated drums throughout the facility. Attempts were made to place drums in locations least affected by breaches in the facility's roof. During the action two trailers were also found outside and on facility grounds (20 foot and 40 foot) containing drums of unknown materials. The facility owner allowed access on the afternoon of March 21st and during the day on March 22nd. At the request of the owner, operations were halted at 4:00 PM on March 22nd.

Between March and November 2002, EPA attempted to negotiate a consent agreement for conduct of the action. After initially indicating a willingness to conduct the action the owner declined to participate. On November 18, 2002, the facility owner granted EPA access to complete removal activities at the Site. On November 14, 2002 OSC Stilman, ERRS and the facility owner toured the Site in anticipation of activities. The building had further deteriorated, with large holes present in the roof. The building continued to be covered by a Dade County condemnation order. On November 18, 2002,

ERRS and USCG-GST arrived on-scene to begin segregation and characterization of on-site wastes. Most of the containers in the facility were found to be subject to exposure to rain due to large holes in the roof throughout. Upon arrival, evidence of leakage and failure of the drums and other containers was also found. Initial activities were completed and the site demobed to prepare for disposal.

On March 7, 2003, the EPA Region 4 Waste Management Division Director authorized additional funds and a 12-month extension for continued removal action. EPA again attempted to negotiate a clean-up agreement with the Moss Soap and Chemical Company (MSCC). MSCC declined EPA's offer. On July 25, 2003, EPA and ERRS returned to stage drums into compatible disposal groups, stage newly discovered drums and containers for hazardous characterization, collect profile samples, and lab pack the building laboratory for disposal. Upon arrival the facility was found to be in even worse shape from the previous EPA entries. Additional roof sections had collapsed and additional drums were found leaking. Portions of the facility, inside and outside, were found to be covered by chemical slicks from the leaking drums. The facility owner met EPA and ERRS on-site and was given a summary of EPA's proposed action. OSC Stilman requested the owner over pack and clean-up the chemical slicks found throughout. The owner declined OSC Stilman's request.

During the July and August 2003 site visit:

- a. The facility laboratory was packed into drums and containers for disposal.
- b. Drummed waste was segregated into waste groups in preparation for bulking and disposal. Additional drummed waste, was found, during a complete top to bottom search of the facility, sampled and HazCatted. This included 29 drums removed from one of two shipping containers found on-site. The other shipping container was emptied during the November. 31 drums were discovered in a previously unknown room and 8 drums were discovered outside of a breeze way door between the two buildings.
- c. Loose soil and debris from behind the shipping container was excavated and buried drums found.
- d. While on-site, it was noted that during each rain event, rain mixed with various chemicals from leaking drums and flowed onto the adjacent street. One such release was discovered to have a pH of 11. Measures were taken to reduce this flow. As before, the crowded conditions, the partially collapsed roof and chemical slicks from leaking drums, hampered activities.

On September 4, 2003, EPA and ERRS re-mobed to the Site to complete disposal activities. Disposal was complete and the Site demobed on September 19, 2003.

On May 27, 2005, EPA and the new Site owner entered into an agreement to complete clean-up of the Site.

Current Activities

In July of 2005, the building owner submitted a work plan in compliance with the Agreement. After some modification, that work plan was approved in September of 2005.

The contractor hired by the owner mobilized to the Site on October 9, 2005 to conduct operations. OSC Stilman also arrived on-scene to oversee operations. Drums, tanks and other debris were removed from the building and shipped off-site for disposal.

On October 20, 2005, the contractor demobilized the Site to await final disposal.

Planned Removal Actions

Upon completion of final disposal, the Building Owner will submit a final report, in compliance with the Agreement.

Next Steps

OSC Stilman will conduct a final review of the Site, upon receipt of the building owner's report.

response.epa.gov/mossenforcement