

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, May 26, 2006

From: Leslie Sims

Subject: Stabilization of Site

Tennessee Wheel & Rubber

817 18th Avenue North, Nashville, TN

Latitude: 36.1631000

Longitude: -86.8036000

POLREP No.:	2	Site #:	A4LR
Reporting Period:	5/23/06 - 5/26/06	D.O. #:	0207-F4-0031
Start Date:	5/22/2006	Response Authority:	CERCLA/OPA
Mob Date:	5/22/2006	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	TNN000409873	Contract #	68-S4-02-07
RCRIS ID #:		Reimbursable Account #	
FPN#			

Site Description

Tennessee Wheel and Rubber manufactured small wheel assemblies and casters. A foundry for casting aluminum and synthetic rubber production were the primary manufacturing processes. In February 2005 (approximate date), the corporation was bankrupt and dissolved. Drums of hydraulic oil, acids, and solvents were staged outside after a fire that occurred after the facility shut down. Some drums were empty but filled with rainwater. It appears that residue and storm water mixed in the empty drums.

Two buildings and a courtyard between comprise the facility. The area is mixed residential and commercial. Residences are within approximately 200 yards of the facility. Both buildings are in poor repair and rainwater has flooded each building.

All the drums were rusted, in poor condition, and represented potential releases or discharges to the environment. One drum of hydraulic oil was leaking, and it was difficult to discern if other drums had already leaked their entire contents. Runoff from the leaking drum and an oil saturated area inside the north building may have been the cause of the sheen which was carried with the storm water runoff into the Metro Nashville Sewer (combined overflow) System.

Current Activities

EPA's immediate action was to place sorbent boom at storm water drain and at facility gate to limit the flow of organic chemicals and oil into Metro Nashville Sewer system. Then the EPA ERRS contractor, FHI, constructed a temporary berm to prevent contaminated runoff from entering the Nashville Metro sewer system.

In the three days that followed the initial response, EPA accomplished the following:

1. Pumped off any accumulated storm water runoff into poly tanks.
2. Hazard categorized all the drums to separate chemical and oil drums from those with accumulated storm water.
3. Pumped off all accumulated storm water from the drums filled with storm water into the poly tanks (approximatley 7,000 gallons total).
4. Sampled the water collected in the poly tank to determine a suitable method of disposal.
5. Staged drums filled with chemicals and oil indoors on palettes in a secure area.
6. Sampled the chemicals and oil to identify the contents.
7. Applied Oil-Dry to the pile of debris saturated with oil.
8. Built a berm to reroute storm water around this debris pile to prevent further runoff.
9. Pumped out the two sumps, located in the south building, that contain what appears to be oil.
10. Overpacked any leaking drums.
11. Sampled powders on ground to determine if they present a respiratory hazard to workers on site.

Hazcatting indicated that several of the drums were oil and chemicals (as labeled). The 55 gallon drums (along with suspected contents) include: 39 drums of hydraulic oil; 1 drum of toluene, 1 drum of naptha solvent, 1 drum of perchlorethylene, 1 drum of laquer thinner, one drum of transmission fluid, 2 drums with toluene diisocyanite as active ingredient (0.1%), 1 drum of phosphoric acid, 11 drums of methyl ethyl ketone (MEK) and two drums of kerosene. Several smaller containers were also collected. A detailed inventory is attached (see Documents section).

On the north side of the north building, approximately 20 to 25 drums were found outside. Vegetation had grown over some of these containers. Two of the drums were bulging, but none appeared to be leaking. These were left in place and will require investigation with appropriate safety protocols and PPE in place. EPA identified two underground storage tanks. These appear to have been designed to hold heating oil.

Planned Removal Actions

The following action items have been identified:

1. Sample and dispose of collected water (in coordination with Metro Sewer if discharge to the system is appropriate).
2. Determine if solids are hazardous wastes.
3. Identify contents of drums staged outside of north building.
4. Determine if there is any oil left in the USTs and drain them if oil is present.

response.epa.gov/tennesseewheelandrubber