United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, December 21, 2006
From: Leslie Sims

Subject: Continuation of ER
Tennessee Wheel & Rubber
817 18th Avenue North, Nashville, TN
Latitude: 36.1631000
Longitude: -86.8036000

POLREP No.:	4	**Site #:**	A4LR
Reporting Period:		**D.O. #:**	0207-F4-0031
Start Date:	5/22/2006	**Response Authority:**	CERCLA
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 #:			

Site Description
Tennessee Wheel and Rubber Site, a defunct wheel assembly and caster manufacturing company is located at 817 18th Avenue North in Nashville, TN. The company filed for bankruptcy and ceased operations in February 2005. The property has been abandoned since that time.

Approximately 300-500 containers of substances, varying in size, content, and stages of deterioration, were located on site and along the perimeter of the property co-mingled with dense vegetation and debris. A sheen was observed in runoff water bisecting a debris pile on site and entering a nearby catch basin. Refer to previous POLREPs for more detail.

Current Activities
12/5-7, 2006
EPA completed a comprehensive site assessment during this period. The assessment included sampling of all of the drums retrieved and staged during the November 2006 stabilization effort. The samples were submitted to an EPA laboratory for analysis. In regard to the storm water runoff sampled and analyzed during the previous reporting period, with the exception of low levels of extractible petroleum hydrocarbons (EPH), all samples analyzed were reported as non-detectable or below action limits.

12/19-21, 2006
EPA's START and ERRS contractors returned to the site to continue removal activities. Based on the analytical results related to the runoff water, and permission from Nashville Metro Wastewater, approximately 7,000 gallons of runoff water was treated and released to the POTW via a nearby catch basin. An in-line carbon filtration system was utilized to remove any remaining low level EPHs from the water prior to release. The effluent was monitored throughout the filtration process to ensure compliance with Metro's discharge standards.

ERRS continued to retrieve, stage and segregate drums at the site. The drums contained similar substances documented during the prior stabilization effort i.e., oily liquids, solvents and solid resins.

Warning signs and barricade tape were placed throughout the property to warn off trespassers and bring public awareness to the potential hazards posed at the site.

Planned Removal Actions
Planned removal activities include:

1)Continue to retreive, stage and segregate containers of hazardous substances.

2)Continue hazardous categorization of drums.

3)Dispose/recycle off-site all hazardous waste/oil related to this response in accordance with appropriate and applicable local, state and Federal regulations.

Next Steps
EPA will return to the site on January 8, 2007 to conduct final removal activities.

Key Issues
In May 2006, EPA issued a Notice of Federal Interest (NOFI) to the apparent owner of the company. The NOFI notified the owner of the potential liability related to the incident and invited the owner to perform the cleanup. The owner informed EPA that the company lacks the necessary resources to perform the cleanup.

Vagrants continue to trespass the site. The site's close proximity to neighboring residents and evidence of continued vandalism and drum tampering necessitates the need to continue this response as an emergency cleanup action to mitigate the direct and imminent contact threat to human health and safety posed by hazardous substances identified at the site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$50,000.00	$12,000.00	$38,000.00	76.00%
RST/START	$72,000.00	$32,000.00	$40,000.00	55.56%
Intramural Costs				
Total Site Costs	$122,000.00	$44,000.00	$78,000.00	63.93%

* 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.

response.epa.gov/tennesseewheelandrubber

POLREP #4 Last Updated 1/31/2007