

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, December 7, 2007

From: Leslie Sims

Subject: Final POLREP (Revised)

Tennessee Wheel & Rubber

817 18th Avenue North, Nashville, TN

Latitude: 36.1631000

Longitude: -86.8036000

POLREP No.:	6	Site #:	A4LR
Reporting Period:	02/01-6/28/2007	D.O. #:	0207-F4-0031
Start Date:	5/22/2006	Response Authority:	CERCLA
Mob Date:	5/22/2006	Response Type:	Time-Critical
Demob Date:	6/28/2007	NPL Status:	Non NPL
Completion Date:	6/28/2007	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. At the request of TDEC, EPA responded to the site to investigate reports of an oily substance entering an offsite sanitary-sewer system from the property. Upon arrival, the FOSC observed a sheen in runoff bisecting a debris pile and entering a nearby catch basin. Additionally, during the reconnaissance, an estimated 400 containers (suspected of containing hazardous substances), varying in size, content and integrity were observed throughout the property.

Refer to previous POLREPs for more detail.

Current Activities

During the previous reporting period START and EPA completed an environmental sampling program to determine the degree and extent of contamination at the site. The sampling program included the collection of oil, soil and aqueous samples at various target locations throughout the property. With the exception of the oil/oily-water samples collected from two (2) onsite USTs, all of the samples were submitted to the EPA laboratory for analysis. Analyses included, but was not limited to, flashpoint, pH, RCRA metals, PCBs, VOCs, and SVOCs. The oil/oily-water samples, collected from the USTs, were submitted under chain-of-custody to an EPA-approved commercial laboratory for analysis. Analyses included flashpoint, pH, PAH, BTEX, TRPH, PCBs and RCRA metals.

Analytical data related to that effort was received by EPA during this reporting period, and included the following results:

Drum No. TWR-BR-016 revealed a pH of less than 1, indicating a potential D002 wastestream. Drum nos. TWR-BR-005, TWR-BR-018, TWR-BR-020 and TWR-BR-118 revealed flash points below 67°F, indicating potential D001 wastestreams. These drums were included with the wastestreams disposed during the previous reporting period. The oil samples collected from the USTs indicated the tanks contained, what appeared to be, degrading non-RCRA fuel oil (diesel). Laboratory analysis of the soil samples revealed low or non-detectable levels for all analytes tested.

A total of Ninety-six (96) containers of waste were shipped for offsite disposal and included the following waste streams:

- Flammable liquids (19 each 55-gallon drums)
- Tetrachloroethylene (1 each 55-gallon drum)
- Toluene diisocyanate (2 each 55-gallon drums)
- Toluene diisocyanate (1 each 5-gallon pail)

- Sulfuric acid (1 each 55-gallon drum)
- Phosphoric acid (1 each 55-gallon drum)
- Caustic liquids (1 each 55-gallon drum)
- Non-RCRA materials (70 each 55-gallon drums)

Additionally, an estimated 450 empty containers recovered from around the site were crushed and staged onsite within the south building.

On June 28, 2007, EPA's START contractor and TDEC returned to the Site to remove the diesel fuel oil from the two USTs. A total of 625 gallons of oil was removed from the tanks and transported offsite for recycling. The tanks appeared to be in good condition and there were no visible signs of leaking or soil staining observed during this removal action. TDEC secured all inlet valves and drains following evacuation of the diesel fuel. However it should be noted that all UST piping/appurtenances remain connected and; therefore, some residual product may still be present in these lines.

Based on the findings from the sampling program and disposal of all waste streams identified during this removal action, no further action (NFA) is planned for this site by EPA ERRB.

Planned Removal Actions

NFA

Next Steps

NFA

Key Issues

None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$42,000.00	\$8,000.00	16.00%
RST/START	\$72,000.00	\$54,000.00	\$18,000.00	25.00%
Intramural Costs				
Total Site Costs	\$122,000.00	\$96,000.00	\$26,000.00	21.31%

* 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.

Disposition of Wastes

All wastes were properly documented, labeled, loaded, and shipped via Robbie D. Wood, Inc. (ALD067138891) to Chemtron Corporation (OHD066060609) in Avon, OH. A total of 96 containers of waste were shipped on Manifest Number 001753967 and consisted of the following waste streams:

- o Flammable liquids 19 each 55-gallon drums
- o Tetrachloroethylene 1 each 55-gallon drum
- o Toluene diisocyanate 2 each 55-gallon drums
- o Toluene diisocyanate 1 each 5-gallon pail
- o Sulfuric acid 1 each 55-gallon drum
- o Phosphoric acid 1 each 55-gallon drum
- o Caustic liquids 1 each 55-gallon drum
- o Non-RCRA oils, resins, etc. 70 each 55-gallon drums

Waste Stream	Quantity	Manifest #	Disposal Facility
Flammable liquids 19 each 55-gallon drums Tetrachloroethylene 1 each 55-	96	001753967	Chemtron Corporation (OHD066060609) in Avon, OH

gallon drum Toluene diisocyanate 2 each 55-gallon drums Toluene diisocyanate 1 each 5-gallon pail Sulfuric acid 1 each 55-gallon drum Phosphoric acid 1 each 55-gallon			
Dielsel Fuel Oil	625 Gallons	Recycler	Universal Environmental Services, LLC in Mulfreesboro, TN

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POLREP #6 Last Updated 12/7/2007