

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Friday, July 13, 2007

From: Steve Spurlin

Subject: Initial Polrep-Initiation of Emergency Response

American Drum & Pallet

806 Walnut Street, Memphis, TN

Latitude: 35.1253000

Longitude: -90.0335000

POLREP No.:	1	Site #:	A4QQ
Reporting Period:	7/11-7/12/2007	D.O. #:	
Start Date:	7/11/2007	Response Authority:	CERCLA
Mob Date:	7/11/2007	Response Type:	Emergency
Demob Date:	7/12/2007	NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	TND007029200	Contract #	
RCRIS ID #:			

Site Description

The American Drum & Pallet Site is a operational pallet and drum recycling facility located on a multi-parcel property at 806 Walnut Street, Memphis, TN. According to the owner, the facility receives RCRA empty drums for reconditioning.

On February 22, 2007, personnel with the Tennessee Department of Environment & Conservation (TDEC) Division of Solid Waste Management (DSWM) in the Memphis Environmental Field Office (MEFO) received a complaint from a building inspector with the Memphis Fire Department regarding American Drum and Pallet Company (ADPC), located at 806 Walnut Street, Memphis, TN, 38106. The complaint pertained to the storage of unknown materials and concern about conditions observed at the facility. Specifically, the inspector mentioned observing an estimated fifty 15-gallon plastic containers stored at the site. At least one of these containers was labeled with a DOT "Poison – 6" label for "Methyl Parathion." Additionally, the inspector mentioned an estimated fifty drums with labels describing a herbicide product, "Rice Shot."

DSWM personnel visited the site on March 19, 2007, to conduct a hazardous waste inspection. A walk through was conducted within the buildings and outside areas. During the inspection, DSWM staff observed three piles of material (referred to as Debris Piles 1, 2, and 3) placed on the ground outside of the buildings. Materials observed within these piles included plastic 55-gallon and 200-gallon totes, fiberboard drums, metal 55-gallon drums, lids, rags and wooden pallets. Facility personnel indicated that these piles were present at the facility as a result of a facility clean up. In addition to the debris piles, DSWM personnel observed an estimated 118 containers holding material stored at several areas inside of the buildings and within a trailer. At the time of the site visit, facility personnel were not certain of the contents of the containers and material contained in the debris piles.

In order to evaluate ADPC's compliance with applicable requirements of the rules and regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101, the DSWM issued an Information Request, dated April 5, 2007. As of the date of this memo, the DSWM has not received a response that adequately addressed all questions contained in the Information Request.

On June 27, 2007, the Tennessee Department of Environment & Conservation (TDEC) contacted EPA regarding conditions at the facility. Citing concerns about a potential release to the environment from the containers and the uncontained waste on-site, TDEC requested EPA conduct a Removal Site Evaluation.

On July 11, 2007, EPA On-Scene Coordinators, Steve Spurlin and Subash Patel, with EPA START contractor TTEMI initiated a Removal Site Evaluation at the facility. During the site walk through, the OSCs observed numerous 55 gallon drums. Many drums were leaking and in poor condition. Stained soils and pooled oily liquids were noted at several areas near the drums. Dead vegetation was noted along the drainage pathway leading off-site from the property. Flammable and corrosive stickers were noted on many drums. Many of the drums were stored outside and exposed to the weather. The facility

fencing was significantly damaged allowing easy site access. The drums were within 50 feet of a residential home where young children were observed playing nearby. Air monitoring of the drums indicated high levels of volatile compounds.

Because the Site meets the criteria for a time critical removal under 40 CFR 300.415, and the owner was unable to undertake the necessary actions, the OSC initiated an emergency response under the OSC's warrant authority.

Current Activities

On July 11, 2007, the EPA OSC hired local environmental contractor, US Environmental Services (USES), to conduct necessary emergency actions to stabilize the Site. USES retrieved and staged the drums from various areas of the property. Leaking drums were overpacked and all drums lids and bungs were secured to minimize the chance for additional releases. Approximately 250 drums were collected from areas of the property.

START conducted air monitoring, inventoried the drums, and collected samples from some drums. Field testing verified the presence of flammable and corrosive liquids.

EPA and EPA's contractors completed the staging and sampling efforts at approximately 1900 hrs on July 12, 2007.

Planned Removal Actions

EPA is awaiting results from the testing; however, field testing and observations during the emergency response indicate many of the drums contain hazardous substances that need proper disposal.

Next Steps

Due to the unsecured nature of the property, the quantity and type of hazardous substances, and the proximity to nearby homes, the threats posed by the Site need to be addressed in a timely manner.

response.epa.gov/AmericanDrum&Pallet