

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

**Date:** Friday, October 17, 2008

**From:** Richard Jardine

**Subject:** First & Final

Madison Abandoned Drums

Madison, AL

Latitude: 34.6928000

Longitude: -86.7811000

<b>POLREP No.:</b>	1	<b>Site #:</b>	A4WQ
<b>Reporting Period:</b>	30SEP through 01OCT 2008	<b>D.O. #:</b>	
<b>Start Date:</b>	9/30/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/30/2008	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>	10/1/2008	<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>	10/1/2008	<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>		<b>Contract #</b>	
<b>RCRIS ID #:</b>			

**Site Description**

A commercial developer uncovered some damaged drums while conducting site earth moving activities. Early laboratory data indicated the liquids and sludges to contain toxaphene. PRP delays notification to NRC and to ADEM for a time period believed to be over one month.

**Current Activities**

ADEM SOSC Luken and EPA OSCs Jardine and Huyser mobilize to site to provide oversight of PRPs removal actions. ADEM and EPA conference with PRPs environmental consultant and attorney discussing history of site and objectives required for successful removal action. General approach of removal action appears sound and is described as follows:

- identify primary contaminants of concern;
- conduct geophysical survey to identify other potential burial areas;
- excavate contaminated soil and drums;
- containerize all source material;
- explore all suspect geophysical anomalies by intrusive inspection (excavate);
- stockpile suspected contaminated soil for characterization and disposal;
- conduct closure sampling.

As SOSC Luken and OSCs Jardine, Huyser and START visit the site removal operations are underway. Grossly contaminated liquid and sludges are overpacked into 2 drums. Crushed drums and richly contaminated soil are stockpiled on a visqueen barrier approximately 70 feet from construction trailer. Pesticide smell is strong. Ambient temperature is approximately 80 degrees Fahrenheit. PRPs response contractor has downgraded from Level 'B' operations to a poor level 'D' protective measure. Workers are in civilian clothing that is dirt-stained, no outer booties over work boots and no gloves. No Site-specific H&S Plan available on site.

Due to deteriorated work practice, SOSC and OSC agree to stop work and discuss enforcement of appropriate Health and Safety procedures for continuing excavation activity. Response contractor immediately implemented provisions including donning gloves and decontaminating any outer wear prior to demobilizing from the site. Further, contractor covered the stockpiled soil with visqueen to minimize fugitive emissions. Contractor was allowed to finish the day conducting exploratory excavations in suspect geophysical anomaly areas.

Beginning at 08:00 on Wednesday all response personnel convene to review Site-specific Health & Safety Plan and discuss operations planned for the day. Workers have donned a strong Level D including hard hat, eye protection, saranex (or poly-coated suits), steel-toed boots with outer booties, and surgical-type gloves. Outer leather gloves are donned for activity that might damage surgical gloves.

Bruce Freeman, ADEM, arrives on site for site review and recon.

Response workers begin activity by loading heavily contaminated materials into lined roll-off boxes and covering boxes. Workers then return to continue excavation of single burial location where toxaphene drums were discovered. As excavations are advanced, environmental consultant for PRP conducts field screening of trench wall and floor to determine whether clean material is encountered.

PRPs consultant and EPA START split samples for laboratory analysis.

OSC Jardine issues Notice of Federal Interest to attorney representing PRP. PRPs attorney declines to sign notice until conference with client. OSC Jardine keeps one copy for record.

### **Planned Removal Actions**

PRP to continue excavations attempting to reach 0.4 ppm of toxaphene in soil or less. PRP will conduct hazardous waste determination and arrange for treatment or disposal of all contaminated materials.

### **Next Steps**

Review lab data as it becomes available and confer with ADEM SOSC regarding oversight activities.

### **Key Issues**

Should PRP fail to return acknowledgement of EPAs NOFI, find additional containers for hazardous materials, mishandle wastes, or fail to continue operations in using safe/protective techniques, EPA may elect to assume removal operations.

[response.epa.gov/madison drums](https://response.epa.gov/madison drums)