

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
ESI - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V**

**Subject: POLREP #1  
Initial  
ESI  
B5YS  
Indianapolis, IN  
Latitude: 39.9128600 Longitude: -86.2423680**

**To:** Mark Johnson, ATSDR  
Harry Atkinson, IDEM  
Ken McDaniel, IDEM  
USCG NRC, NRC  
Linda Nachowicz, U.S. EPA Region V, ERB 2  
David Chung, U.S. EPA HQ  
Charles Gebien, U.S. EPA Region V  
Richard Karl, U.S. EPA Region V  
John Maritote, U.S. EPA Region V  
William Messenger, U.S. EPA Region V  
Jeff Kelley, U.S. EPA Region V, CIC  
Debbie Keating, U.S. EPA Region V, ESS  
John Steketee, U.S. EPA Region V, ORC  
Nola Hicks, U.S. EPA Region V, ORC  
Kendall Moore, U.S. EPA Region V, LCD  
Karen Kirchner, U.S. EPA Region V, LCD  
Carol Staniec, U.S. EPA Region V, Water  
Richard Wise, City of Indianapolis  
Kim Cussen, United Water  
George Richotte, IDEM  
Ryan Groves, IDEM  
Jason Doerflein, Marion County Health Department  
Stephen Jones, Pike Fire Department  
TJ Edwards, City of Indianapolis  
Rick Mehl, Weston Solutions  
Trenna Sundquist, Weston Solutions  
Brian Coninx, Weston Solutions  
Anita Boseman, U.S. EPA Region V  
Natalie Maupin, IDEM  
Susan Perdomo, U.S. EPA Region V, ORC  
Gary Prichard, U.S. EPA Region V, ORC  
Megan Nagle, IDEM

Janet Pope, U.S. EPA Region V

**From:** Verneta Simon, On-Scene Coordinator  
**Date:** 10/9/2010  
**Reporting Period:** 10/8-10/9

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B5YS	<b>Contract Number:</b>	EP-S5-09-05
<b>D.O. Number:</b>	47	<b>Action Memo Date:</b>	9/30/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/8/2010	<b>Start Date:</b>	10/8/2010
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	INN0051050501	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Bankrupt Commercial Used Oils facility

#### 1.1.2 Site Description

The ESI site is a commercial used oil processing facility that includes a tank farm and several ancillary buildings such as a wastewater treatment plant, a sludge treatment building, a sludge treatment process area, an oil dehydration process area, laboratory/office building, and a truck off-loading building. In addition, ESI has a parking lot in front of the tank farm, a maintenance building immediately adjacent to the tank farm, and a rail unloading area less than one mile west of the tank farm. Yesterday, it was determined that the parking lot, maintenance building, and rail unloading area were leased from Marathon Petroleum.

The tank farm and ancillary buildings cover approximately 8.2 acres and have multiple process and storage tanks, ranging in size from 1,200 to 1,000,000 gallons in volume. The tank farm is designed so that all stormwater is captured in its internal sewer system and ultimately run through the wastewater processing equipment prior to being discharged into the City of Indianapolis Sanitary Sewer System.

##### 1.1.2.1 Location

4910 West 86th Street, Indianapolis, Indiana

##### 1.1.2.2 Description of Threat

There are a number of chemicals stored at the facility, for example, recycled oils, caustic soda, hydrogen peroxide and sulfuric acid in tanks and totes. In addition, there are 1.5 million gallons

of sludge stored on-site in two separate one million gallon bunker tanks. Furthermore, all the storm water drains into the bunker tanks with the 1.5 million gallons of sludge, therefore, there is a strong potential for an overflow during a high intensity rainfall events.

From 2007 to the present, there have been City of Indianapolis sanitary sewer overflows that were traced to this facility. Contaminants were found as far as 6 miles from this facility at 27 residences and three golf courses, Riverside Golf Academy, Riverside Golf Course, and Coffin Golf course. The Indianapolis Department of Public Works has spent about \$100,000 dealing with the sewer overflows. In one home, it was necessary to replace the hot water tank and the sump pump because of the overflow backing up into their basement.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

On July 18, 2007, ESI was informed by a customer that they had discovered 28 mg/kg PCBs in a used oil shipment from ESI. This resulted in some PCB remediation, however, there is definitely one tank, Tank #51, and maybe two additional tanks, Tank #43 and #44 that were PCB impacted. On September 30, 2010 Tank #51 received a TSCA approval letter on the remediation process to be followed by WSP, ESI's Insurance Company's Environmental Consultant. A discussion between IDEM and USEPA Land and Chemicals Division regarding Tank #43 and #44 will be held next week. WSP is estimating between 4 and 6 weeks to complete the PCB remediation work.

A limited site assessment was conducted on September 1, 2010. Also, on September 1, there was a joint IDEM and USEPA Land and Chemicals PCB inspection.

Prior to USEPA mobilizing to the site, the City of Indianapolis Department of Public Works and United Water checked on ESI and provided a chemical inventory. On October 7, IDEM responded to the security guard's observation of a ESI tanker leaking and placed boom until USEPA arrived on October 8.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

#### **2.1.2 Response Actions to Date**

U.S. EPA arrived at the site on October 8, 2010 and addressed the leaky tanker. The EERS contractor, Environmental Restoration (ER), sampled the contents and stopped the leak. Sample results yielded a pH value of 7.

The Bankruptcy Trustee and Pike Fire Department toured the facility on October 8.

U.S. EPA has arranged for site security, collected samples, developed a draft storm water contingency plan and made arrangements for disposal on 10/12 of hydrogen peroxide and sodium hydrosulfide. During further evaluation of the facility, a sign displaying "Caution Radioactive" was observed in the Laboratory. There are at least 4 pieces of equipment that use a radioactive source. Several buildings and flammable container cabinets were locked during inspection. The master set of keys to the facility was found and samples have been taken from the previously unaccessible areas.

A total of 33 samples were taken from various tanks and drums on site. Each sample was tested for hazardous characterization (HazCat). It was determined that five of the samples had "questionable" levels of chlorine, indicating the potential for PCB contamination.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

On September 23, 2010, verbal notice was given to ESI. Also a Unilateral Order was sent to ESI. ESI, of course, was not able to comply because they declared Chapter 7 Bankruptcy on October 1, 2010.

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

**2.2.1.1 Planned Response Activities**

10/11 Receive comments on the draft storm water contingency plan  
 10/12 Ship hydrogen peroxide and sodium hydrosulfide off-site

**2.2.1.2 Next Steps**

The City of Indianapolis has received two odor complaints regarding this facility. In addition, Pike Fire has in the past received complaints regarding this facility. START is researching masking agents that could be used since some of the tanks are open top.

Pending approval of the storm water contingency plan, measures will be taken to manage on-site storm water run-off during a significant rainfall event. Rain has been forecasted in the latest 10/13 weather report.

**2.2.2 Issues**

None.

**2.3 Logistics Section**

Not applicable.

**2.4 Finance Section**

**Estimated Costs \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$75,000.00	\$10,000.00	\$65,000.00	86.67%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$75,000.00</b>	<b>\$10,000.00</b>	<b>\$65,000.00</b>	<b>86.67%</b>

\* 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.

**2.5 Safety Officer**

A site safety plan was signed by all present.

**2.6 Liaison Officer**

Not applicable.

**2.7 Information Officer**

**2.7.1 Public Information Officer**

Not applicable.

**2.7.2 Community Involvement Coordinator**

Not applicable.

**3. Participating Entities**

**3.1 Unified Command**

Indiana Department of Environmental Management  
Indianapolis Department of Public Works  
Pike Fire Department

**3.2 Cooperating and Assisting Agencies**

Marion County Health Department

**4. Personnel On Site**

1 EPA OSC  
5 ERRS – ER  
2 START – Weston Solutions

## **5. Definition of Terms**

ERRS – Emergency and Rapid Response Services

IDEM – Indiana Department of Environmental Management

OSC – On-Scene Coordinator

RCRA – Resource Conservation and Recovery Act

START – Superfund Technical Assessment and Response Team

U.S. EPA – United States Environmental Protection Agency

## **6. Additional sources of information**

### **6.1 Internet location of additional information/reports**

For additional information, please refer to “Documents” on [www.epaosc.org/](http://www.epaosc.org/).

### **6.2 Reporting Schedule**

The next POLREP will be submitted at a date to be determined.

## **7. Situational Reference Materials**

For additional information, please refer to “Documents” on [www.epaosc.org/](http://www.epaosc.org/).