

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Traylor Chemicals Site - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Traylor Chemicals Site
C5P8
Royal Center, IN
Latitude: 40.8593780 Longitude: -85.6003340

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From: Anita L. Boseman, On-Scene Coordinator

Date: 11/22/2013

Reporting Period: 11/7/2013-11/21/2013

1. Introduction

1.1 Background

Site Number:	C5P8	Contract Number:	EP-S5-09-05
D.O. Number:	0137	Action Memo Date:	9/23/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	

Mobilization Date:	11/12/2013	Start Date:	11/7/2013
Demob Date:		Completion Date:	
CERCLIS ID:	INN 000 510 934	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Abandon Commercial Fertilizer Manufacturing Facility

1.1.2 Site Description

The Site is the location of the former Traylor Chemicals & Supply Company fertilizer chemical manufacturing facility. The Site consists of several one-story industrial buildings and occupies approximately 2.9 acres. The property has been abandoned since approximately 2009, but the date closed is unknown. William Traylor is recorded as the current owner.

1.1.2.1 Location

The Site is located at 126 North Market Street, Royal Center, Cass County, Indiana 46978. The Site is bordered by an adjacent industrial property to the northwest with West Black Lane beyond, South Market Street to the northeast with residential properties beyond, industrial property to the southeast with residential properties beyond, and Panhandle Pathway recreational trail (formerly A & R Railroad) to the southwest with vacant land and residential properties beyond. The coordinates of the Site are 40°51'57.22" North latitude and -85°30'12.22" West longitude.

1.1.2.2 Description of Threat

The contaminants of concern at the Site include fertilizer manufacturing-related chemicals and unknown contaminants that are present in an array of tanks, totes, drums, small containers, and/or other miscellaneous containers at the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On May 27, 2011, City of Royal Center conducted a site reconnaissance. During the City of Royal Center site reconnaissance, a number of containers/materials were found throughout the former fertilizer chemical manufacturing facility. Chemical container labels observed during the initial City of Royal Center site reconnaissance included: sulfate potash, zinc chelate, zinc sulfate, aluminum sulfate, copper sulfate, magnesium sulfate anhydrous, zinc sulfate monohydrate, soluble potash, ferrous sulfate, potassium nitrate, ferrous sulfate heptahydrate, potassium carbonate, liquid zinc, liquid boron, liquid calcium, copper chelate, zinc ammonium complex, fuming acid, sulfuric acid, and potassium bisulfate.

On November 21, 2012, the United States Environmental Protection Agency (EPA) received a request from the Indiana Department of Environmental Management (IDEM) to conduct an assessment of the Site.

On September 23, 2013, an action memorandum was signed approving a time-critical removal action to be performed at the Traylor Chemicals Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On January 23, 2013, EPA On-Scene Coordinator (OSC) Jacob Hassan and IDEM conducted site

reconnaissance and the following observations were made:

- The Site was not totally fenced;
- Site buildings were in various stages of decay with leaking roofs;
- Site buildings were covered with graffiti and had evidence of trespassing;
- There is one drain located on the south end of the south large building and the drain connection is unknown.

From April 2-3, 2013, EPA OSC Anita L. Boseman and Superfund Technical Assessment and Response Team (START) personnel (+3) performed a Site Assessment, including sample collection. Activities performed during the Site Assessment included:

- Written and photo documentation of Site conditions;
- Conducting air monitoring;
- Inventorying drums, totes, and other material containers; and
- Collecting 9 liquid waste samples, 5 solid waste samples, and 2 surface wipe samples from various containers/surfaces onsite.

Samples were hand delivered by START to a lab courier on April 3, 2013 with for analyses.

The Site Assessment identified:

- Numerous abandon tanks, drums, and small containers in poor condition (leaking and buldging) throughout the facility;
- Strong acids, and corrosive wastes are present;
- Huge quantity of waste containing sulfides, nitrates, and boron; and
- Unrestricted access and signs of trespassing into the facility

On September 25, 2013, an action memorandum was approved to perform the cleanup.

2.1.2 Response Actions to Date

From November 7-21, 2013 the following tasks were completed:

- U.S. EPA, START, and ERRS mobilize to Site.
- Obtain keys to the facility and discuss initial removal site set up including: site security, vegetation removal, site electricity, site house keeping , delivery of site trailers, and possible staging areas.
- Air monitoring was performed for O₂, LEL, H₂S, VOC & CO while inside the facility - all readings 0ppm.
- November 12, 2013, EPA, START and ERRS mobilized to Site
- Replaced locks on the exterior doors to the Site building
- Cleared vegetation at the south end of the Site for office trailers
- Commenced updating the hazardous waste inventory of all containers present at the Site
- Continued clearing vegetation in the southeast corner of the site near Area #5
- Secured broken window in Area #2
- Completed updating container inventory for Areas #1, #2, #4, #6, and #7
- Posted EPA signs on the exterior site fence along North Market Street
- Electrician inspected the Site buildings
- Clearing vegetation and debris continued between Areas #5 and #6
- Stand up lighting was set up inside Area #4
- The Site was secured for the weekend, U.S. EPA, START, and ERRS demobilize from Site.
- November 18, 2013, repaired the 2 main entrance gates on the east side of the site, along North Market Street
- Delivered break room trailer for crew
- Collected MSDS sheets from the facility office to assist with identifying chemicals at the Site
- Assembled a Contamination Reduction Zone (CRZ) tent in Area #5
- Removed loose/falling insulation material from the ceiling of Area #3, and placed into roll-off box for disposal

- Turned on electricity to the Site building
- Two work trailers for ERRS and EPA/START delivered to the site
- Collected, consolidated and staged miscellaneous small containers into one Area #4
- Collected, and staged expired fire extinguishers found onsite
- Collected 5 soil samples (four samples outside the southeast corner of the Area 5 building, one background sample outside the northwest corner of Area 4 near the main office) for the following analysis: Volatile organic compounds (VOCs), and target analyte list (TAL) Metals
- Collected one waste liquid sample from a hose in Area #5 for the following analysis: VOCs, and TAL Metals
- Soil and waste liquid samples were transported via courier to Pace Analytical Services, Inc
- Payne Electric setup electricity to site trailers
- Commenced Scraping and sweeping dust, and debris in the Area #6
- EPA's Fields team delivered air monitoring equipment; DataRAMs and an AreaRAE kit
- All indoor Site activities were performed in Level D or C PPE
- Air monitoring was performed using the MultiRAE Pro and DataRAMS. No elevated levels of chemicals were observed, however particulate levels were elevated during insulation removal and housekeeping activities
- Secured site for the weekend, U.S. EPA, START, and ERRS demobilize from Site

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

To be determined

2.1.4 Progress Metrics

No off-site disposal took place during this reporting time period

2.2 Planning Section

2.2.1 Anticipated Activities

Continue house keeping and container inventory

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

Continue removal action

2.2.2 Issues

None

2.3 Logistics Section

Not applicable

2.4 Finance Section

2.4.1 Narrative

These cost are estimated up to November 22, 2013.

2.5 Other Command Staff

2.5.1 Safety Officer

A site safety plan has been approved, and then reviewed and signed by all Site personnel.

2.5.2 Liaison Officer

Not applicable

2.5.3 Information Officer

Teresa Jones, EPA-CIC

A town hall meeting will be held in Royal Center, Indiana at the Royal Center Fire Department on Monday, November 25th at 7pm.

3. Participating Entities

3.1 Unified Command

Not applicable

3.2 Cooperating Agencies

U.S. EPA

IDEM

Cass County

The City of Royal Center

Royal Center Fire Department

Royal Center Police Department

4. Personnel On Site

1 - EPA OSC

1 - START (Weston Solutions, Inc.)

4 - ERRS (Environmental Restoration, LLC)

5. Definition of Terms

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act known as Superfund

CO - Carbon Monoxide

COR - Contracting Officer Representative

CRZ - Contamination Reduction Zone

EPA – United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services

H₂S - Hydrogen Sulfide

IDEM – Indiana Department of Environmental Management

LEL - Lower Explosive Limit

MSDS - Material Safety Data Sheets

O₂ - Oxygen

OSC – On-Scene Coordinator

NH₃ - Ammonia

PPE - Personal Protective Equipment

PRPs - Potentially Responsible Parties

START – Superfund Technical Assessment and Response Team

TAL - Target Analyte List Metals

U.S EPA - United States Environmental Protection Agency

VOCs - Volatile Organic Compounds

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, please refer to “Documents” on www.epaosc.org/TraylorChemicals.

6.2 Reporting Schedule

To be determined

7. Situational Reference Materials

For additional information, please refer to “Documents” on www.epaosc.org/TraylorChemicals.