

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Wrigley Charcoal Plant Site - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initiation of a Time Critical Asbestos Removal Action  
Wrigley Charcoal Plant Site  
04X6  
Lyles, TN  
Latitude: 35.9026562 Longitude: -87.3510982

**To:** James Webster, USEPA R4 ERRPB  
Andy Binford, TDEC

**From:** Steve Spurlin, OSC

**Date:** 7/21/2015

**Reporting Period:** July 13, 2015-July 24, 2015

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	04X6	<b>Contract Number:</b>	EPS40702
<b>D.O. Number:</b>	0124	<b>Action Memo Date:</b>	6/30/2015
<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>	NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/13/2015	<b>Start Date:</b>	7/13/2015
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	TND980844781	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	07/13/2015
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

The Site is a fund lead time critical removal action to address threats posed by asbestos containing roof tiles.

#### 1.1.2 Site Description

The Wrigley Charcoal Plant Site includes seven distinct areas affected by various industrial activities. The U.S. Environmental Protection Agency (EPA) placed the Site on the National Priorities List (NPL) in 1989 because of contaminated debris, ground water and soil resulting from facility operations dating back to the 1880's.

In 1995, Industrial Plastics Recycling started operating a small-scale recycling facility on the southern portion of the Site. Industrial Plastics Recycling conducted metals and plastics recycling, storage of waste products and other related activities on the southern portion of the Wrigley Charcoal Plant NPL Site. Industrial Plastics Recycling utilized approximately 15 acres of the NPL Site and consisted of a large warehouse, a large processing building and approximately five acres of outside/uncovered storage of processed and unprocessed acrylic, poly-carbonate, ABS, polyethylene, polypropylene, styrene, PVC and PETG plastics in totes and piles. The Site is surrounded by residential communities and directly adjacent to the North Fork of Mill Creek.

On December 18, 2013, the Industrial Plastics Recycling facility caught fire. Approximately five acres of plastics and surrounding buildings were involved and on fire. A large smoke plume ensued that extended for miles downwind. Numerous homes and business were impacted by the smoke plume. State and local officials implemented a 1½-mile evacuation zone in all directions. The EPA responded under emergency authority and assisted with extinguishing the fire. The fire resulted in significant damage to the buildings and structures at the Site, and Industrial Plastics Recycling ceased operating at the Site. For additional information regarding the Industrial Plastics Recycling incident, please visit the following website:

<http://epaossc.org/industrialplasticscofire>

The fire, time, and weather events have impacted the roofing tiles on the old buildings. The majority of the tiles have fallen onto the ground. Testing by TDEC and EPA verified the tiles contain asbestos. A time

critical removal action will be conducted by EPA to address the asbestos tiles and any soil areas impacted by the asbestos.

#### **1.1.2.1 Location**

The Site address is 8526 Plant Road, Lyles, Hickman County, Tennessee. The Site is located northwest of Highway 100, about 45 miles southwest of Nashville. The Site is surrounded by residential communities and directly adjacent to the North Fork of Mill Creek.

#### **1.1.2.2 Description of Threat**

On April 20, 2015, the EPA and Tetra Tech collected 66 bulk samples from suspect asbestos-containing materials associated with the site buildings and site building debris. Analysis of the bulk samples indicated 10 of the 66 samples contained asbestos concentrations greater than one percent. The concentration of asbestos in the roof material ranged from 10 to 60 percent. On April 21, 2015, the EPA and Tetra Tech collected composite soil samples from 25 delineated surface soil areas outside of the building and structures. These samples were collected to determine if surface soils located further away from the building exterior walls contained asbestos. Five of the 25 samples contained concentrations of asbestos ranging from 0.30 to 0.60.

The disease and pathology associated with the inhalation of asbestos fibers is well documented in the medical literature. Congress has found that "*medical science has established that no minimal exposure to asbestos fibers which is considered safe to exposed persons.*" (20 U.S.C. § 3601(a)(3)). If inhaled, asbestos fibers can increase the risk of developing lung cancer, mesothelioma, pleural fibrosis and asbestosis.

In addition to potential exposure to nearby residents, the EPA SRSEB plans to undertake extensive sampling and remedial action as part of the NPL process; therefore, human exposure is likely under current Site conditions. Site conditions are consistent with criteria outlined in the September 2008 EPA OSWER Directive 9200.0-68 "Framework for Investigating Asbestos-Contaminated Superfund Sites", which supports a removal action when human exposure is likely. An action is warranted to prevent exposure to workers who will be operating at or near the area of contamination, future tenants and nearby residents.

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

In December 2013, the TDEC Division of Air Pollution Control collected samples from the Site. Sample results verified that asbestos-containing material (chrysotile) was present at the Site.

On April 20, 2015, the EPA and Tetra Tech collected 66 bulk samples from suspect asbestos-containing materials associated with the site buildings and site building debris. Analysis of the bulk samples indicated 10 of the 66 samples contained asbestos concentrations greater than one percent. The concentration of asbestos in the roof material ranged from 10 to 60 percent. On April 21, 2015, the EPA and Tetra Tech collected composite soil samples from 25 delineated surface soil areas outside of the building and structures. These samples were collected to determine if surface soils located further away from the building exterior walls contained asbestos. Five of the 25 samples contained concentrations of asbestos ranging from 0.30 to 0.60 percent.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

On July 13, 2015, EPA mobilized equipment and personnel to the Site to begin a time critical removal action to address threats from asbestos roofing tiles. The scope of the removal involves the physical removal of the tiles that remain attached to the roof, and the tiles that have fallen inside and outside the building. Project duration is estimated at six weeks.

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

Period July 13-July 17, 2015

-EPA ERRS contractor, CMC Environmental Services (CMC), mobilized personnel and equipment to the Site.

-CMC began clearing debris to provide an area for job trailers, site support materials, and equipment.

-Job trailers were staged, and CMC began collecting and cutting scrap metal that was not contaminated with asbestos. Scrap metal is being shipped off-site for recycle.

Period July 20-July 24, 2015

-CMC continues to load out scrap. To date, 6 loads (est. 75 tons) of clean scrap metal have been shipped offsite for recycle.

-CMC established an exclusion zone work area perimeter, and posted the area with appropriate asbestos warning signage. Two roll boxes have been staged onsite in preparation for the initiation of asbestos removal activities.

-Tetrattech collected 4 background air samples, and will remain at the Site to document site activities and collect perimeter air samples.

-CMC began removing asbestos from areas around and inside the North building. To date, eight roll offs of

asbestos waste have been generated, and five of the eight roll offs have been transported off the Site for disposal.

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

This is a fund led time critical removal action.

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
asbestos	roof tile	5 rolloffs (20 cubic yards/rolloff)	see waste tracking spreadsheet in Documents section of website	landfill	Waste Management-West Camden Sanitary landfill

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

The removal of asbestos will continue. Perimeter and personal asbestos air sampling will be conducted daily during site operations.

**2.2.1.1 Planned Response Activities**

**2.2.1.2 Next Steps**

**2.2.2 Issues**

**2.3 Logistics Section**

No information available at this time.

**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	\$450,000.00	\$101,981.00	\$348,019.00	77.34%
TAT/START	\$150,000.00	\$10,000.00	\$140,000.00	93.33%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$600,000.00</b>	<b>\$111,981.00</b>	<b>\$488,019.00</b>	<b>81.34%</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 Other Command Staff**

No information available at this time.

**3. Participating Entities**

No information available at this time.

**4. Personnel On Site**

No information available at this time.

**5. Definition of Terms**

No information available at this time.

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.

POLREP #1 Last Updated 8/31/2015