



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

AR0002

September 3, 1996

SUBJECT: Documentation of OSC Initiation of a Removal Action at the San Carlos Pesticide Site, San Carlos Apache Reservation, Arizona

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TO: Keith Takata, Deputy Director
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I. ISSUE

The purpose of this memorandum is to document the initiation of the removal action described herein for the San Carlos Pesticide Site (the "Site"), located on the San Carlos Apache Reservation in Arizona.

II. SITE CONDITIONS AND BACKGROUND

Site Status: Non-NPL
Category of Removal: Emergency
CERCLIS ID: Pending
Site ID: Pending
Nationally Significant or Precedent Setting: No
Mobilization Date: 8-27-96
Completion Date: TBD

A. Site Description

1. **Physical Location.** The San Carlos Pesticide Site is located on the San Carlos Apache Reservation approximately 70 miles east of Phoenix, AZ.

2. **General Characteristics.** The site consists of one single-story office building. This building (the Head Start office) is located within the small down-town area of San Carlos. A day-care facility and a school are located immediately adjacent to the Site. Many other buildings are located within a several hundred yard radius of the Site, including several residences, additional schools, a hospital, post office, retail and office buildings.

Multiple drums of material were stored in the basement of the building. Flooding from an unknown source triggered a release of the materials within the drums. Eventually it was determined there were seven drums: three drums of paint, one drum of chlorinated herbicide, 2 drums of oily (non-chlorinated) material and one drum of crystalline material.

3. **NPL Status.** This site is not on the NPL and is not proposed for listing.

B. Incident/Release Characteristics

The following chronology describes response actions at the Site prior to EPA arrival:

Sunday Aug 25

- Security officer noticed an odor at the Head Start office. The odor was not reported.

Monday Aug 26

- Head Start personnel noticed a dull odor.

Tuesday Aug 27

- Office personnel noticed that the odor was more apparent. Staff began experiencing symptoms - headache and ENT irritation. Staff vacated building in the morning. At approximately 13:00 the Tribal EMT/Fire Dept. evacuated several blocks within the vicinity of the Site.
- 16:00 ADEQ personnel arrived onsite.
- 16:30 EPA-ERS notified of the incident through the National Response Center. EPA continued to monitor the incident via telephone.
- 22:00 State contract personnel arrived onsite, conducted an initial assessment and began pumping contaminated water from the basement to a temporary storage tank. Pumping operations continued through the night. The initial entry was performed in Level A protection and was later downgraded to Level B.

Wednesday Aug 28

- ADEQ and contract personnel continued to pump contaminated water from the basement. Evacuation of a several block area continued.
- State Health Dept. personnel met with individuals who had complained of health effects.
- 09:30 ADEQ requested federal assistance. EPA and contract personnel mobilized to the Site.

III. THREATS TO PUBLIC HEALTH AND WELFARE OR THE ENVIRONMENT

A. Threats to Public Health and Welfare

The conditions at the Site were evaluated using the criteria

established in the NCP. Chemicals identified at the Site are "hazardous substances" as defined by section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and 40 C.F.R. Section 302.4 and Table 302.4.

The FOSC believed that releases and threats of releases of hazardous substances were present at the Site, and that this Site fell within the definition of an "Emergency" removal action. Highly toxic chemicals, including pentachlorophenol, had been identified at the Site, and a release to the atmosphere had occurred..

The Site is located within the small down-town area of San Carlos. A day-care facility and a school are located immediately adjacent to the Site. Many other buildings are located within a several hundred yard radius of the Site, including several residences, additional schools, a hospital, post office, retail and office buildings. Several occupants of the Head Start building already had been exposed to chemicals at the Site, and there are a number of pathways and mechanisms by which additional persons could be exposed to chemicals from the Site. The FOSC believed that a removal action was necessary because conditions at the Site posed an unacceptable threat to public health, welfare and the environment. Pursuant to Section 300.415(b)(2) of the National Contingency Plan ("NCP") the following conditions necessary for initiating a removal action were present at the Site:

- 1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations or the food chain.**

Several occupants of the Head Start building were exposed to chemicals at the Site. Vapors from the site could be detected a distance away, and significant potential existed for additional exposure to occupants of nearby buildings.

- 2. Actual or potential contamination of drinking water supplies.**

It is unlikely that the Site has caused groundwater contamination. However, the chemicals at the Site were highly mobile, and it is possible that, in the event of a release, groundwater contamination could have occurred.

- 3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.**

Multiple drums were identified in the basement of the Head Start building. These drums were stored in an insecure manner, and several of the drums were observed to be leaking. Flooding of the basement had triggered a release

of chemicals from the drums.

4. High levels of hazardous substances or pollutants or contaminants in soils at or near the surface, that may migrate.

It is unlikely that the Site has caused soil contamination. However, containers at the Site were leaking and it is possible that soil contamination could have occurred.

5. Threat of fire or explosion.

There was a threat of fire or explosion at this Site due to the presence of flammable material.

6. Availability of other appropriate Federal or State response mechanisms to respond to the release.

Cleanup actions at the Site were initiated by the State. However, the cost of the cleanup exceeded the amount of funding available from the State.

B. Threats to the Environment

The Site posed a threat of fire, spillage, and migration of the chemicals present on the Site to onsite soils or groundwater. These chemicals are highly mobile in the environment and there was a possibility that the chemicals could migrate offsite.

IV. ENFORCEMENT

No PRPs have been identified at this time.

V. PROPOSED ACTIONS AND COST

A. Proposed Action

1. Scope of the Proposed Action. Upon request for assistance from ADEQ on August 28, EPA immediately mobilized to the Site. EPA conducted the following actions at the Site.

Thursday Aug 29

1. O/S Personnel: 1-EPA, 3-START, 5-ERCS, 1-ADEQ, 1-AZDoH

2. O/S Weather: Hot

3. Actions Taken:

- 07:00 OSC Dunkelmann arrived onsite. EPA assumed lead for hazmat ops and began incurring Site costs. ICS system in place with Police Chief serving as IC.
- ERCS personnel completed pumping of contaminated water, removed and overpacked drums, and began placing water-contact debris in roll-off bin. ERCS

- and START personnel conducted field hazard characterization tests of drummed liquids.
- Work conducted in Level B protection. One ERCS personnel suffered a heat-related illness and was briefly taken to a hospital for observation.
 - OSC Dunkelman participated in AM and PM briefings with ICS staff, tribal reps, media and community members.
 - Evacuation of all but Head Start office discontinued in PM. Schools are to remain closed until 9/3.

Friday Aug 30

1. O/S Personnel: 1-EPA, 4-ERCS
2. O/S Weather: Hot
3. Actions Taken:

- Completed removal of debris from basement, conducted gross decon of basement with power sprayer, conducted offsite transport of waste material and demobed from site.

2. Long-Term Remedial Action. There is no anticipated long-term remedial action associated with this project.

3. Project Schedule. FOSC Dunkelman recommended that the Head Start office be vacated for several weeks. EPA will return in 2-3 weeks to assess condition of building and make a recommendation to the tribe regarding the building status.

4. Alternative Actions Considered.

No Action - This is inappropriate due to the imminent threats that exist at the site.

Local Action - The local agencies do not have the resources to handle the situation appropriately.

State Action - ADEQ does not have sufficient funding to complete the cleanup.

PRP Action - At the time of the action, no PRPS had been identified.

5. Applicable or relevant and appropriate requirements (ARARs)

This removal action, to the extent practicable considering the exigencies of the situation, attained applicable or relevant and appropriate requirements under federal environmental or state environmental or facility siting laws.

B. Estimated Costs

Prior to initiation of the removal action, the costs for the Site were approximated as follows:

Extramural Costs (ERCS)	\$ 70,000
Extramural Costs (TAT)	\$ 20,000
Sub-Total Extramural	\$ 90,000
Extramural contingency (20%)	\$ 18,000
Total Extramural	\$108,000
Total Intramural Costs	\$ 20,000
Total Project Ceiling	\$128,000

VI. IMPORTANT POLICY ISSUES

No important policy issues have been identified at this time.

VII. INITIATION OF EMERGENCY REMOVAL ACTION

Because conditions at the Site met the NCP Section 300.415(b)(2) criteria for a removal, an emergency removal action was initiated under the \$200,000 procurement authority. The total project ceiling was \$128,000 of which \$70,000 were from the regional removal Advice of Allowance.