



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BLVD  
CHICAGO, IL 60604

05 DEC 2011



**MEMORANDUM**

**SUBJECT:** ACTION MEMORANDUM - Request for Approval and Funding for Emergency and Time-Critical Removal Actions at the Advance Plating Works Site, Indianapolis, Marion County, Indiana (Site ID # C589)

**FROM:** Shelly Lam, On-Scene Coordinator  
Emergency Response Branch 1/Response Section 1

**THRU:** Jason H. El-Zein, Chief  
Emergency Response Branch 1

**TO:** Richard C. Karl, Director  
Superfund Division

**I. PURPOSE**

This memorandum is to request and document your approval to expend up to \$913,752 to conduct emergency and time-critical removal actions at the Advance Plating Works Site (the Site) in Indianapolis, Marion County, Indiana. On September 20-21, 2011, Emergency Response Branch (ERB) 1 Chief, Jason El-Zein, verbally authorized \$25,000 in funding to conduct emergency removal actions to mitigate an imminent and substantial threat of release.

The response actions proposed herein are necessary in order to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site, a former plating shop. The Environmental Protection Agency's (EPA) On-Scene Coordinator (OSC) has documented the presence of hazardous substances at the Site.

Emergency response actions included stabilization, sampling, and segregation of drums; and securing the Site, including waste materials. The time-critical removal actions are to complete the following: develop and implement Site plans including a Site-specific Health and Safety Plan, a Site Emergency Contingency Plan, and a Work Plan; establish Site security and an incident command post; inventory and perform hazard characterization on substances contained in vats, pits, drums, and other containers; perform sampling and analysis to determine disposal options; dismantle and decontaminate process equipment and building components associated with the former plating areas; and transport and dispose off-site hazardous substances, pollutants and contaminants.

If viable responsible parties cannot be found, EPA will conduct these response actions in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. § 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to abate or eliminate the immediate threats posed to public health and/or the environment.

The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as both emergency and time-critical removal actions. The project will require approximately 60 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. This Site is not listed on the National Priorities List (NPL).

## **II. SITE CONDITIONS AND BACKGROUND**

CERCLIS ID: INN000510649  
RCRA ID: IND985059898  
Category: Emergency and Time-Critical Removal Actions

### **A. Site Description**

#### **1. Removal Site Evaluation**

The following sections provide background information on the Site.

##### **a. Advance Plating Works**

Advance Plating Works (Photo 1) operated as a plating shop beginning in 1912 until 2009 when the company owners declared bankruptcy. Former operations at the facility included nickel, chrome, zinc, cadmium, and copper plating. The Site is vacant but contains two buildings – the former plating shop and a warehouse (Photo 2).

##### **b. Marion County Public Health Department (MCPHD)**

The Indianapolis Metropolitan Police Department referred the Site to MCPHD based on complaints of trespassing and metal scrapping at the abandoned facility. The MCPHD inspector noted that “at the back of the property, a section of wooden fence had been pulled down. The overhead doors in the rear of the building were open. The metal piping hanging over vats had evidence of damage most likely from metal theft. There were metal and poly drums on the exterior of the building labeled with corrosive materials. There was a second building on the property. The side door was open. In the back corner of the building (there were) a very large number of drums and poly totes” (MCPHD, 2011). MCPHD immediately requested assistance from the Indiana Department of Environmental Management (IDEM) and EPA.

### **c. EPA**

At the request of MCPHD, EPA OSC Shelly Lam responded to the Site on the afternoon of September 20, 2011, where she met with representatives from MCPHD and the property owners. After obtaining access, OSC Lam conducted a reconnaissance and documented drums, totes, plating vats and other containers inside and outside the facility buildings (Photo 3-4). Many drums were unlabeled and in poor condition. Labeled drums included toxic, corrosive, oxidizing, and flammable materials. OSC Lam also documented that trespassing had been occurring and that trespassers had been cutting metal process piping above the plating vats (Photos 5-7).

On September 20th, OSC Lam conferred with the IDEM OSC and both agreed that EPA would conduct emergency response actions at the Site. EPA initiated actions by mobilizing the Superfund Technical Assessment and Response Team (START) and Emergency and Rapid Response Services (ERRS) contractors. EPA and its contractors secured the Site and the waste located therein. Activities included inventorying, segregating, and staging drums; securing the Site; and collecting samples.

EPA documented 163 drums, 10 totes, 5 plating vats, 5 pits and sumps, and hundreds of small containers. Labeled materials included sodium hydroxide, hydrogen peroxide, potassium cyanide (Photo 8), sodium cyanide, sulfuric acid, hydrocyanic acid, nitric acid, and paint thinner. OSC Lam documented that there was a threat to human health and the environment from abandoned drums, many of which were in poor condition and leaking. There was also a threat of fire or explosion from improperly stored flammable materials in a building where trespassing was occurring.

EPA collected a limited number of samples for laboratory analysis. START and ERRS collected samples from six drums and one small container. The sampled containers were all characteristic for hazardous waste, including ignitability (D001), corrosivity (D002), and reactivity (D003), per the Resource Conservation and Recovery Act (RCRA), 40 Code of Federal Regulations (CFR) 261 (see Table 1).

One small container had a flashpoint of 110 degrees Fahrenheit (°F), below the RCRA criteria for ignitability of 140°F. One drum had total and reactive cyanide at concentrations of 15,000 and 1,300 milligrams per kilogram (mg/kg), meeting the RCRA criteria for reactivity. Four drums had pH below 2 standard units (SU), and one had a pH at 13.5 SU, all of which met the RCRA criteria for corrosivity. Analytical results from the Site Assessment are documented in START's report (Weston Solutions, 2011).

## **2. Physical location**

The Advance Plating Works Site is located at 1005 E. Sumner Avenue in Indianapolis, Marion County, Indiana, 46227 (see Figures 1, 2, 3, and Photo 1). The facility is in an area on the south side of Indianapolis that is primarily industrial. However, there is a residential facility (a nursing home) (Photo 9) adjacent to the Site to the east and additional residential properties

within a few hundred feet to the northeast. The geographical coordinates for the Site are latitude 39.7152° north and longitude 86.1417° west.

The OSC screened the area surrounding the Advance Plating Works Site for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are high-priority potential EJ areas of concern according to EPA Region 5. The Advance Plating Works Site is in a census tract with a score of 2 (Attachment III). Therefore, Region 5 considers this Site to be a high-priority potential EJ area of concern. Please refer to the attached analysis for additional information.

### **3. Site characteristics**

The Site is 3 acres in size, and contains two buildings. The Site has been vacant since 2009, but was operated as a plating shop from 1912 to 2009.

The Site is located on the south side of Indianapolis and is surrounded by Grinstead Auto & Paint Supply, SealMaster, and residential properties to the north; Bethany Village Nursing Home to the east; Moore Restoration Disaster Kleenup to the south; and a rail line to the west.

### **4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant**

A release or threat of release of hazardous substances, pollutants, or contaminants is present at the Site. EPA confirmed the presence of hazardous substances as defined by Section 101(14) of CERCLA including hazardous waste, sodium hydroxide, hydrogen peroxide, potassium cyanide, sodium cyanide, sulfuric acid, hydrocyanic acid, and nitric acid and characteristic hazardous waste including ignitable, corrosive, and reactive waste streams; and pollutants and contaminants as defined by Section 101(33) of CERCLA. START's Report documenting these findings is part of the Administrative Record for the Site.

### **5. NPL status**

This Site is not on the NPL.

### **6. Maps, pictures and other graphic representations**

Figure 1 Site Location Map, Figure 2 Site Layout Map, Figure 3 Photographs, and Attachment III - Environmental Justice (EJ) analysis are included as attachments.

## **B. Other Actions to Date**

### **1. Previous actions**

This Action Memo documents previous actions in the Background Section.

## 2. Current actions

The Site is secure and no actions are currently being conducted at the Site.

### C. State and Local Authorities' Roles

Eric Kaufman of MCPHD verbally requested assistance from U.S. EPA on September 20, 2011. MCPHD and IDEM do not have the resources to mitigate the threat of release.

### III. **THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

The conditions present at the Advance Plating Works Site present an imminent and substantial threat to the public health, or welfare, and the environment based upon the factors set forth in NCP § 300.415(b)(2). These factors include, but are not limited to, the following:

#### **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

During the emergency response, EPA documented 163 drums, 10 totes, 5 plating vats, pits, sumps, and hundreds of small containers. There were abandoned drums, many of which were in poor condition and leaking. Labeled materials included sodium hydroxide, hydrogen peroxide, potassium cyanide, sodium cyanide, sulfuric acid, hydrocyanic acid, and nitric acid. Many of the drums, totes, vats, sumps, and small containers contained unidentified materials. Trespassing had been occurring through open back and side doors and the trespassers had been cutting metal process piping above the plating vats. The OSC has estimated that as much as 40 tons of hazardous waste may require off-Site disposal.

Analytical results from the Site Assessment indicate that hazardous substances, as defined by CERCLA § 101(14), pollutants, and contaminants are present at the Site and represent an actual or potential exposure threat to nearby human populations. These included toxic, ignitable, corrosive, and reactive materials.

The Agency for Toxic Substances and Disease Registry (ATSDR) has studied toxicological effects of the hazardous substances, and information about several of these chemicals is provided below and referenced in the Administrative Record (Attachment II).

Sodium hydroxide is very corrosive and can cause severe burns in all tissues that come in contact with it. Inhalation of low levels of sodium hydroxide as dusts, mists or aerosols may cause irritation of the nose, throat, and respiratory airways. Inhalation of higher levels can produce swelling or spasms of the upper airway leading to obstruction and loss of measurable pulse; inflammation of the lungs and accumulation of fluid in the lungs may also occur. Ingestion of solid or liquid sodium hydroxide can cause spontaneous vomiting, chest and abdominal pain, and difficulty swallowing. Corrosive injury to the mouth, throat, esophagus, and stomach is very rapid and may result in perforation, hemorrhage, and narrowing of the gastrointestinal tract. Case reports indicate that death results from shock, infection of the

corroded tissues, lung damage, or loss of measurable pulse. Skin contact with sodium hydroxide can cause severe burns with deep ulcerations. Contact with the eye may produce pain and irritation, and in severe cases, clouding of the eye and blindness. Long-term exposure to sodium hydroxide in the air may lead to ulceration of the nasal passages and chronic skin irritation (ATSDR, CAS # 1310-73-2, April 2002).

Hydrogen peroxide can be toxic if ingested, inhaled, or by contact with the skin or eyes. Inhalation of vapors from concentrated (higher than 10%) solutions may result in severe pulmonary irritation. Ingestion of dilute solutions of hydrogen peroxide may result in vomiting, mild gastrointestinal irritation, gastric distension, and on rare occasions, gastrointestinal erosions or embolism (blockage of blood vessels by air bubbles). Ingestion of solutions of 10-20% strength produces similar symptoms, but exposed tissues may also be burned. Ingestion of even more concentrated solutions, in addition to the above, may also induce rapid loss of consciousness followed by respiratory paralysis. Eye exposure to 3% hydrogen peroxide may result in pain and irritation, but severe injury is rare. More concentrated solution may result in ulceration or perforation of the cornea. Skin contact can cause irritation and temporary bleaching of the skin and hair. Contact with concentrated solutions may cause severe skin burns with blisters (ATSDR, CAS # 7722-84-1, April 2002).

Exposure to high levels of potassium and sodium cyanide for a short time harms the brain and heart and can even cause coma and death. Workers who inhaled low levels of hydrogen cyanide over a period of years had breathing difficulties, chest pain, vomiting, blood changes, headaches, and enlargement of the thyroid gland (ATSDR, July 2006).

Contact with sulfuric acid will burn skin, and breathing sulfuric acid can result in tooth erosion and respiratory tract irritation. Drinking sulfuric acid will burn the mouth, throat, and stomach; it can result in death. Sulfuric acid in the eyes will cause the eyes to water and burn. People who have breathed large quantities of sulfuric acid at work have shown an increase in cancers of the larynx. The International Agency for Research on Cancer (IARC) has determined that occupational exposure to strong inorganic acid mists containing sulfuric acid is carcinogenic to humans (ATSDR, CAS # 7664-93-9, June 1999).

Residential and industrial properties are located near the Site. The OSC documented that the Site was abandoned and that trespassing had occurred. Trespassers had opened doors and removed a section of fence at the facility (Photos 6-7). EPA observed that trespassers had been cutting process piping located above plating vats (Photo 5). Direct contact with hazardous substances was possible. The close proximity of residential and industrial properties adjacent to the Site greatly increases the likelihood of exposure to human populations. Potential exposure pathways include dermal contact, ingestion, or inhalation from a release caused by fire or explosion that could cause imminent endangerment to human health and the environment.

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

EPA inventoried 163 drums, 10 totes, 5 plating vats, 5 pits and sumps, and hundreds of small containers. There were abandoned drums, many of which were in poor condition and

leaking. Labeled materials included sodium hydroxide, hydrogen peroxide, potassium cyanide, sodium cyanide, sulfuric acid, hydrocyanic acid, and nitric acid and there were unlabeled materials in vats, pits, drums and small containers.

Laboratory results documented that sampled materials were characteristic for hazardous waste, including ignitable, corrosive, and reactive waste streams. Many of the drums, totes, vats, sumps, and small containers contained unidentified materials; however, based on EPA's experience at cleaning up numerous plating shops, these Sites often contain characteristic and listed hazardous waste. Many of the drums and other containers were in poor condition, leaking or without lids (Photo 10). There is a very high potential of a release of hazardous substances from the drums and other bulk storage containers, particularly with evidence of trespassing at the Site.

#### **Threat of fire or explosion;**

Analytical results from the Site Assessment indicate that one sample had flashpoint results at 110 °F, which meets the criteria for ignitibility for RCRA characteristic waste. Many other small containers, which were not sampled, had "flammable" labels.

There is evidence that trespassers have entered the Site to scavenge metal. Should metal scrapping occur in the future, trespassers most likely would use torches or saws to remove metal, and the sparks from that equipment could start a fire. The Site is without a fire suppression system, water or electricity. If a fire occurred in proximity to the hazardous substances, it could result in the release of toxic vapors, including hydrogen cyanide gas, which is generated by sodium or potassium cyanide decomposing on contact with acids, which are stored in close proximity at the Site. Sodium and potassium cyanide also react violently with strong oxidants, such as hydrogen peroxide (stored nearby), causing an explosion hazard.

#### **The availability of other appropriate federal or State response mechanisms to respond to the release;**

On September 20, 2011, MCPHD requested assistance from EPA. Neither MCPHD nor IDEM has the resources to immediately mitigate the threat of release.

### **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

### **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

#### **A. Proposed Actions**

## **1. Proposed action description**

### **Emergency Response Actions**

The OSC conducted the following emergency response actions to mitigate the threat of release at the Advance Plating Works Site:

- a. Stabilized, sampled, and segregated drums, totes, and other small containers; and
- b. Secured waste and the Site to prevent trespassing.

### **Time-Critical Removal Actions**

The OSC proposes to undertake the following time-critical removal actions to mitigate threats posed by the presence of hazardous substances at the Advance Plating Works Site:

- a. Develop and implement Site plans including a Site-specific Health and Safety Plan, a Site Emergency Contingency Plan, and a work plan;
- b. Inventory and perform hazard characterization on substances contained in vats, pits, drums, and other containers;
- c. Perform sampling and analysis to determine disposal options;
- d. Dismantle and decontaminate process equipment and building components associated with the plating area;
- e. Consolidate and package hazardous substances, pollutants and contaminants for transportation and off-site disposal in accordance with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

The OSC will conduct removal actions in a manner not inconsistent with the NCP. The OSC will initiate planning for provision of post-removal Site control consistent with the provisions of NCP § 300.415(1).

The threats posed by uncontrolled substances considered hazardous meet the criteria listed in NCP § 300.415(b)(2), and the response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

The estimated costs to complete the activities outlined above are summarized below. These activities will require an estimated 60 on-site working days to complete.

Detailed cleanup contractor costs are presented in Attachment I.

**2. Contribution to remedial performance**

The proposed action should not impede future actions based on available information.

**3. Engineering Evaluation/Cost Analysis (EE/CA)**

Not Applicable

**4. Applicable or relevant and appropriate requirements (ARAR)**

The OSC sent a letter on September 26, 2011, to Gabriele Hauer and Rex Osborn at IDEM requesting the identification of any applicable state ARARs. IDEM submitted potential state ARARs for the Site on September 29, 2011 (IDEM, 2011). EPA will attain the ARARs to the extent practicable.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

**B. Removal Project Ceiling Estimate – Extramural Costs:**

<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Costs (Includes a 20% contingency)	\$666,167
<u>Other Extramural Costs Not Funded from the Regional Allowance</u>	
Total START, including multiplier costs	\$128,400
Subtotal, Extramural Costs	\$794,567
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$119,185
<b>TOTAL REMOVAL ACTION PROJECT CEILING</b>	<b>\$913,752</b>

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

## **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Given the Site conditions, the nature of the hazardous substances documented on-site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened release of hazardous substances from the Site, if not addressed by implementing the time-critical actions described in this Action Memorandum, may have presented an imminent and substantial endangerment to public health, welfare, or the environment. Delayed or no action concerning the remaining hazardous substances, pollutants and contaminants at the Site will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

## **VII. OUTSTANDING POLICY ISSUES**

None.

## **VIII. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Confidential Enforcement Addendum.

The total EPA costs of this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,584,878.<sup>1</sup> Extramural costs are estimated to be \$913,752 and direct intramural costs are estimated to be \$60,000.

$$(\$913,752 + \$60,000) + (62.76\% \times \$973,752) = \$1,584,878$$

## **IX. RECOMMENDATION**

This decision document represents the selected removal action for the Advance Plating Works Site located in Indianapolis, Marion County, Indiana. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site (see Attachment II).

Conditions at the Site meet the NCP § 300.415(b)(2) criteria for emergency and time-critical removal actions. The total project ceiling, if approved, will be \$913,752. Of this, as much as \$785,352 comes from the Regional removal allowance. I recommend your approval of

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<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

the proposed emergency response and time-critical removal actions. You may indicate your decision by signing below.

APPROVE: Richard C Kel DATE: 12-5-11  
Director, Superfund Division

DISAPPROVE: \_\_\_\_\_ DATE: \_\_\_\_\_  
Director, Superfund Division

Enforcement Addendum

Figures:

- 1 Site Location Map
- 2 Site Layout Map
- 3 Photo Log

Tables:

- 1 Laboratory Analytical Results

Attachments:

- I. Detailed Cleanup Contractor Cost Estimate
- II. Administrative Record Index
- III. Region V EJ Analysis
- IV. Independent Government Cost Estimate

cc: Sherry Fielding, U.S. EPA, 5104A  
Michael Chezik, U.S. DOI, **w/o Enf. Addendum**  
Harry Atkinson, IDEM **w/o Enf. Addendum**

BCC PAGE  
(REDACTED 1 PAGE)

**ENFORCEMENT CONFIDENTIAL ADDENDUM**

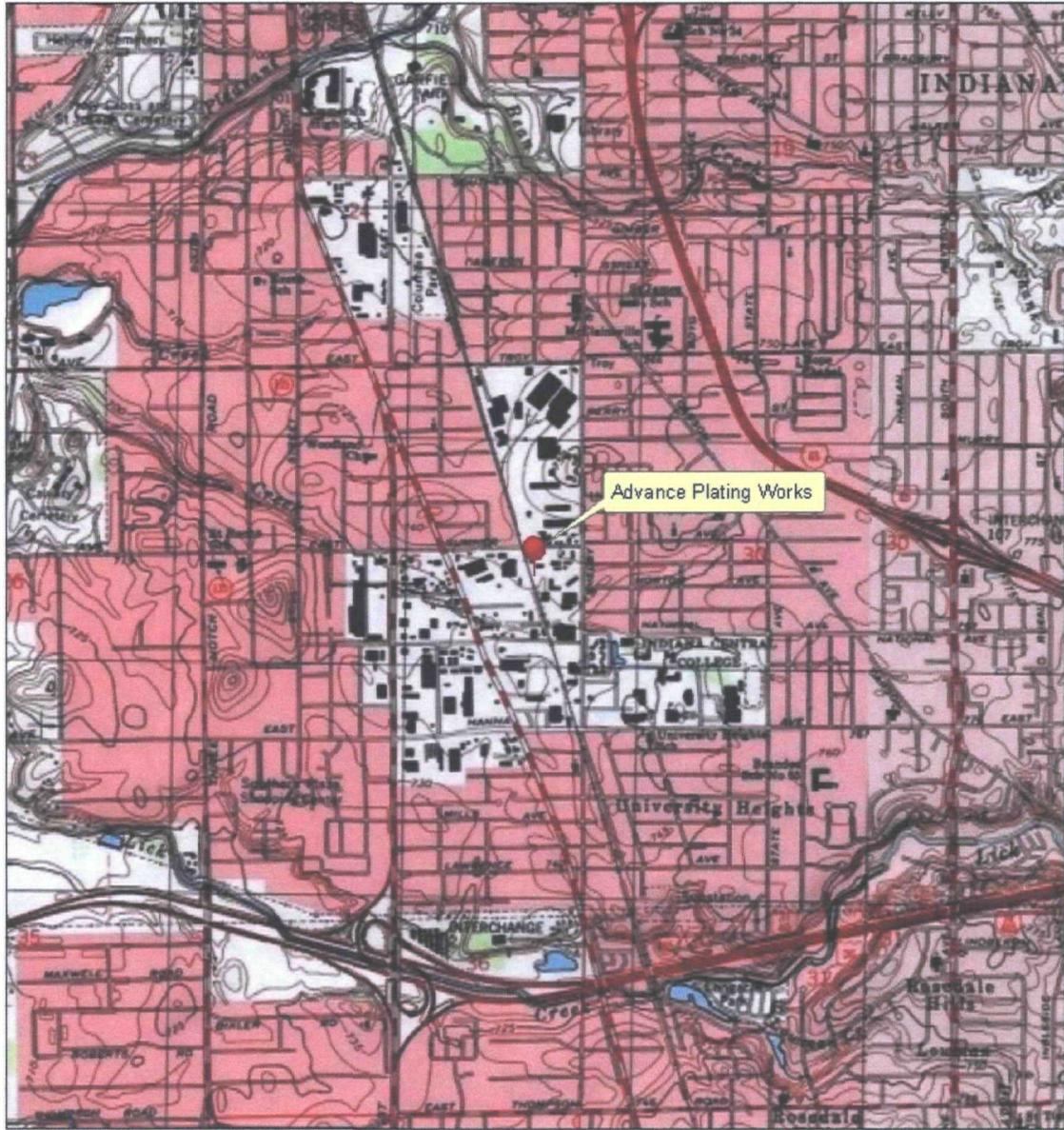
**ADVANCE PLATING WORKS SITE  
INDIANAPOLIS, MARION COUNTY, INDIANA**

**DECEMBER 2011**

**(REDACTED 1 PAGE)**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY**

**FIGURE 1**  
**SITE LOCATION MAP**



**FIGURE 1**  
**SITE LOCATION**  
**ADVANCE PLATING WORKS**  
**1005 E. SUMNER AVENUE**  
**INDIANAPOLIS, MARION COUNTY, INDIANA**



(c) 2009 Microsoft Corporation  
 and its data suppliers  
<http://www.bing.com/maps>  
 Samples locations were determined  
 using EPA's Visual Sample Plan.

1:24,000

0 1,000 2,000 Feet

REVISION 0, SEPTEMBER 27 2011

**FIGURE 2**  
**SITE LAYOUT MAP**



**Legend**

 Site Boundary



**FIGURE 2**  
**SITE LAYOUT**  
**ADVANCE PLATING WORKS**  
**1005 E. SUMNER AVENUE**  
**INDIANAPOLIS, MARION COUNTY, INDIANA**



(c) 2009 Microsoft Corporation  
 and its data suppliers  
<http://www.bing.com/maps>  
 Samples locations were determined  
 using EPA's Visual Sample Plan.

1:1,500



REVISION 0, SEPTEMBER 27 2011

**FIGURE 3  
PHOTO LOG**



Number	1
Description	Former Advance Plating Works, looking north
Photographer	S. Lam
Date	9/20/2011



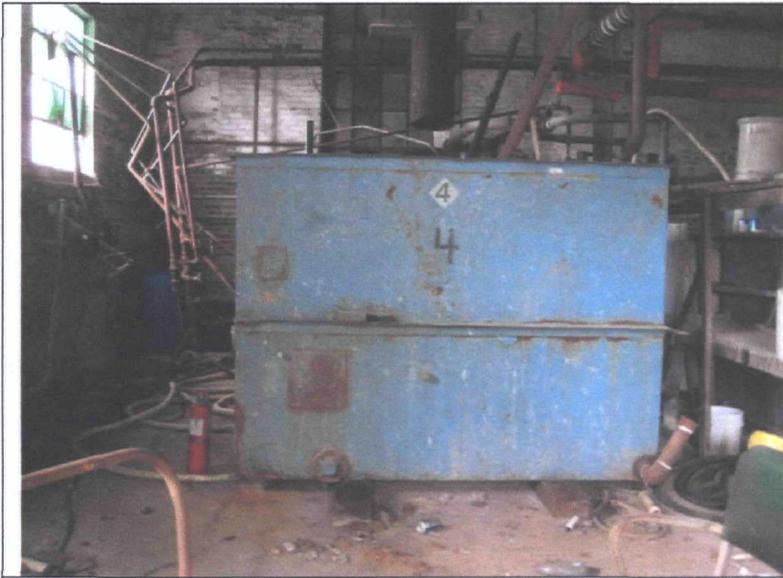
Number	2
Description	Warehouse building, looking south
Photographer	S. Lam
Date	9/22/2011



Number	3
Description	Drums stored outside
Photographer	S. Lam
Date	9/20/2011



Number	4
Description	Drums without lids
Photographer	S. Lam
Date	9/20/2011



Number	5
Description	Plating vat with cut process piping above it
Photographer	S. Lam
Date	9/20/2011



Number	6
Description	Open door at plating shop
Photographer	S. Lam
Date	9/20/2011



Number	7
Description	Area where section of fence had been removed
Photographer	S. Lam
Date	9/20/2011



Number	8
Description	Drums of potassium cyanide and caustic material
Photographer	S. Lam
Date	9/20/2011



Number	9
Description	Nursing home east of the Site
Photographer	S. Lam
Date	9/22/2011



Number	10
Description	Drums stored in warehouse
Photographer	S. Lam
Date	9/21/2011

**TABLE 1**

**LABORATORY ANALYTICAL RESULTS**

**TABLE 1**  
**LABORATORY ANALYTICAL RESULTS**  
**ADVANCE PLATING WORKS**

Sample ID	Regulatory Limit	PT-001	D-001	D-056	D-90	D-113	D-124	D-126
Parameter		Small container	Drum	Drum	Drum	Drum	Drum	Drum
Ignitability (°F) <sup>1</sup>	<140 <sup>2</sup>	<b>110</b> <sup>3</sup>	NA <sup>4</sup>	NA	NA	NA	NA	NA
Cyanide, total (mg/kg) <sup>5</sup>	NA	NA	<b>15,000</b>	NA	NA	NA	NA	NA
Cyanide, reactive (mg/kg)	NA	NA	<b>1,300</b>	NA	NA	NA	NA	NA
pH	<2 or >12.5 <sup>6</sup>	NA	NA	<2	<b>13.5</b>	<2	<2	<2

Notes:

1. °F - Degrees Fahrenheit
2. Characteristic of ignitability, per 40 Code of Federal Regulations (CFR) 261.21(a)(1)
3. Bold results indicate samples above regulatory limits.
4. NA - Not analyzed or not applicable
5. mg/kg - milligrams per kilogram
6. Characteristic of corrosivity, per 40 CFR 261.22(a)(1)

**ATTACHMENT I**

**DETAILED CLEANUP CONTRACTOR COST ESTIMATE  
INDEPENDENT GOVERNMENT CLEANUP CONTRACTOR ESTIMATE**

**ADVANCE PLATING WORKS SITE  
INDIANAPOLIS, MARION COUNTY, INDIANA  
DECEMBER 2011**

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Advance Plating Works Site are as follows:

Personnel & Equipment	\$199,887
Materials/Misc	\$108,642
Transportation & Disposal	\$297,016
Total	\$555,139
Plus 20% Contingency	\$111,028
<b>Total ERRS Contractor Costs</b>	<b>\$666,167</b>

## ATTACHMENT II

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR ADVANCE PLATING WORKS SITE INDIANAPOLIS, MARION COUNTY, INDIANA NOVEMBER 2011

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	06/00/99	ATSDR	File	ToxFAQs Sheet for Sulfur Trioxide and Sulfuric Acid CAS #74460-11-9 and 7664-93-9	2
2	04/00/02	ATSDR	File	ToxFAQs Sheet for Hydrogen Peroxide CAS #7722-84-1	2
3	04/00/02	ATSDR	File	ToxFAQs Sheet for Sodium Hydroxide CAS #1310-73-2	2
4	07/00/06	ATSDR	File	ToxFAQs Sheet for Cyanide CAS #74-90-8, 143-33-9, 151-5-8, 592-01-8, 544-92-3, 506-61-6, 460-19-5, 506-77-4	2
5	09/29/11	Kaufman, E., Marion County Health Dept.	File	Health and Hospital Corporation of Marion County, Marion County Health Dept. Inspection Results for 1005 E Sumner Ave.	2
6	09/21/11	Lam, S., U.S. EPA	Distribution List	Pollution Report (POLREP) #1 Initial for the Advance Plating Works Site	5
7	09/22/11	Lam, S., U.S. EPA	Distribution List	Pollution Report (POLREP) #2 for the Advance Plating Works Site	5
8	09/26/11	Lam, S., U.S. EPA	Hauer, G., IDEM	Letter re: U.S. EPA Request that IDEM Identify any State ARARs for the Advance Plating Works Site	2
9	09/29/11	Petroff, D., IDEM	Lam, S., U.S. EPA	Letter re: IDEM Identifies State ARARs for the Advance Plating Works Site	3

10 00/00/00

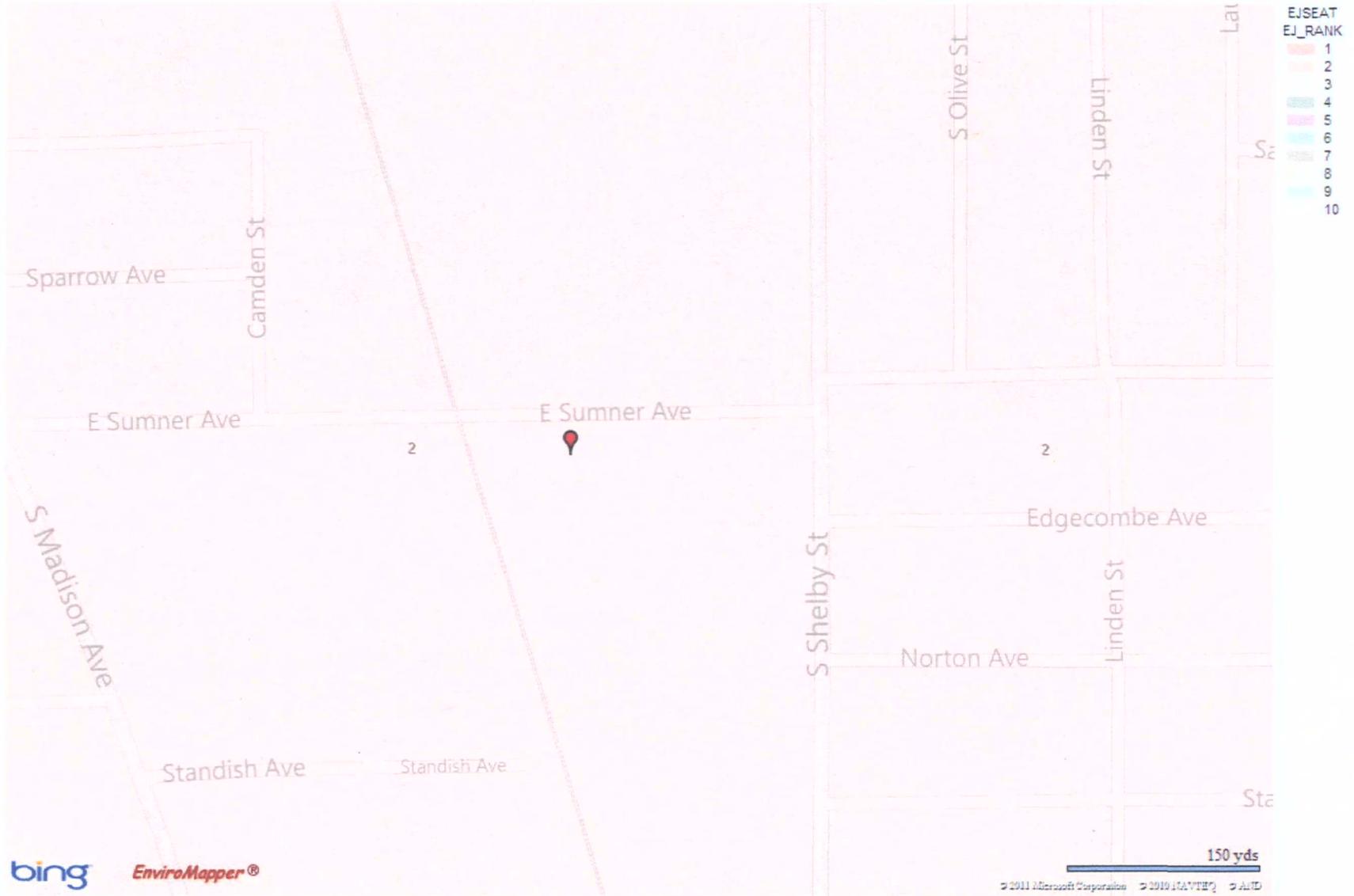
Action Memorandum:  
Advance Plating Works Site  
(PENDING)

11 11/03/11 Weston Lam, S.,  
Solutions U.S. EPA

Letter Report for the  
Advance Plating Works Site  
(PENDING) (Site Assessment  
Report)

**ATTACHMENT III**  
**REGION 5 EJ ANALYSIS**

### Advance Plating Works EJ Assessment



**ATTACHMENT IV**

**INDEPENDENT GOVERNMENT COST ESTIMATE**

**ADVANCE PLATING WORKS SITE  
INDIANAPOLIS, MARION COUNTY, INDIANA**

**DECEMBER 2011**

**(REDACTED 4 PAGES)**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**