

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #11
Progress POLREP
Indiana Brass
B5XQ
Frankfort, IN
Latitude: 40.2806000 Longitude: -86.5198000

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From: Shelly Lam, On-Scene Coordinator

Date: 12/20/2010

Reporting Period: December 2 - 20, 2010

1. Introduction

1.1 Background

Site Number:	B5XQ	Contract Number:	EP-S5-08-02
D.O. Number:	056	Action Memo Date:	8/19/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	7/20/2010	Start Date:	7/20/2010
Demob Date:	12/20/2010	Completion Date:	
CERCLIS ID:	IND006421085	RCRIS ID:	
ERNS No.:		State Notification:	2010-06-043
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Metal Fabrication/Finishing/Coating Facility

1.1.2 Site Description

1.1.2.1 Location

The Indiana Brass Site is located at 800 W. Clinton Street in Frankfort, Clinton County, Indiana, 46041. The geographical coordinates for the Site are Latitude 40.2806° North and Longitude 86.5198° West. The Site is approximately 5 acres in size, and contains the remains of a 85,000 square foot plating shop and foundry. The Site is located in a residential and industrial area of Frankfort, approximately 0.2 miles west of the downtown area. Approximately 3400 people live within 1 mile of the Site. Residences are located approximately 250 feet from the east property boundary, 800 feet from the north property boundary, and 600 feet from the south property boundary.

1.1.2.2 Description of Threat

The Site is a former foundry and plating shop that caught fire on June 3, 2010. The Indiana Department of Environmental Management (IDEM) responded to the fire. The state On-Scene Coordinator (OSC) observed pits and drums relating to former plating operations. IDEM referred the Site to the United States Environmental Protection Agency (U.S. EPA).

During a Site visit on July 1, 2010 and a Site Assessment on July 7-8, 2010, the U.S. EPA documented numerous drums, plating vaults with unknown liquid contents, uncontained foundry sand, and other debris scattered across the Site. Numerous 55-gallon drums containing burnt and unknown contents were documented inside the building. The Site was vacant and open to trespassing.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site Assessment included documenting Site conditions; conducting a structural inspection of the building; conducting air monitoring; conducting soil monitoring using an x-ray fluorescence (XRF) detector; and collecting samples from drums, soil, ash, and plating pits.

Laboratory results indicated that there are total metals concentrations above the preliminary remediation goals (PRG) for industrial soil for lead, arsenic, and copper. Concentrations of leachable lead (D008) and cadmium (D006) were above the Toxicity Characteristic Leachate Procedure (TCLP) regulatory limits. Methylene chloride and trichloroethene (TCE) were detected in the pits, and methylene chloride was also detected in two drums. Additionally, chrysotile asbestos was detected in 5 of the 9 samples collected.

During the removal, EPA sampled 24 homes within 1000 feet of the Site for metal contamination related to the Site. Four of the 24 homes had lead concentrations that exceeded EPA's Preliminary Remediation Goal (PRG) for residential properties of 400 milligrams per kilogram (mg/kg). Concentrations at these properties ranged from 464 to 651 mg/kg. EPA attempted to determine the source of lead by conducting lead speciation on the samples from the four properties but the results were inconclusive because of interferences from carbon, hydrogen, and nitrogen.

In consultation with the Agency for Toxic Substances and Disease Registry (ATSDR), EPA concluded that the lead concentrations at the four homes are from lead-based paint for the following reasons:

1. Each of the homes appears to have been constructed prior to 1978, after which the sale of lead-based paint was discontinued. Based on the age of the homes, it is likely that the exterior was painted with lead-based paint. Most of the homes have flaking and peeling exterior paint.
2. Each of the homes is located on a small lot, which increases the possibility that soil collected from the yards included lead-based paint chips or flakes from exterior paint.
3. The properties are scattered around the study area and their distribution does not indicate a pattern, which would be expected if the lead were attributed to deposition from the Indiana Brass Site.
4. There are properties with lead concentrations below the residential PRG between the Indiana Brass Site and the four impacted residences, indicating that the lead does not appear to have originated from the Indiana Brass Site.

Because the lead contamination at the four residences appears to be related to lead-based paint, EPA referred these properties to the Clinton County Health Department for further action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The site is an abandoned foundry and plating shop located in Frankfort, Indiana. During the Site Assessment, the U.S. EPA documented numerous drums, plating vaults with unknown liquid contents, uncontained foundry sand, and other debris scattered across the Site. Numerous 55-gallon drums containing burnt and unknown contents were documented inside the building. The Site was vacant and open to trespassing.

2.1.2 Response Actions to Date

During this reporting period, U.S. EPA completed the following activities:

- Excavated 21 of 35 grids of impacted soil;
- Backfilled 30 grids;
- Conducted on-site treatment of soil;
- Conducted dust suppression;
- Continued perimeter sampling and monitoring;
- Shipped soil off-site for disposal;
- Conducted an Open House; and
- Demobilized personnel and equipment on December 20, 2010.

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

EPA has identified the PRP and the information is in the site file.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
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Scrap Metal	Solid	131.97 tons	NA	NA	Recycled at Winski Brothers
Brick/Concrete	Solid	2,159.46 tons	NA	NA	Recycled at Milestone Recycling Products
Waste water	Liquid	3,700 gallons	110110-1	NA	Clean Water in Dayton, OH
Construction & demolition debris	Solid	179.82 tons	Various	NA	Clinton County Landfill
Soil	Solid	11,470.08 tons	Various	FreeFlow 200	Clinton County Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

In the spring of 2011, U.S. EPA will complete removal actions by conducting the following tasks:

- Backfill site with topsoil;
- Hydroseed property;
- Repair Cunningham warehouse; and
- Remove fencing.

2.2.1.2 Next Steps

EPA will complete removal actions in the spring of 2011.

2.2.2 Issues

None

2.3 Logistics Section

The Emergency and Rapid Response Services (ERRS) contractor provided logistical support.

2.4 Finance Section

2.4.1 Narrative

ERRS costs are current through December 18th. START costs are current through December 17th.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,500,000.00	\$1,170,340.75	\$329,659.25	21.98%
TAT/START	\$130,000.00	\$95,337.00	\$34,663.00	26.66%
Intramural Costs				
Total Site Costs	\$1,630,000.00	\$1,265,677.75	\$364,322.25	22.35%

* 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

2.5.1 Safety Officer

The OSC was the Site Safety Officer. In addition, each contractor has provided a site-based health and safety representative. Site personnel reviewed and signed the HASP. Tailgate safety meetings were conducted on a daily basis.

2.6 Liaison Officer

Not applicable.

2.7 Information Officer

2.7.1 Public Information Officer

Not Applicable (NA)

2.7.2 Community Involvement Coordinator (CIC)

EPA held an Open House at the Indiana Brass Site on December 15th, inviting IDEM, local officials, and the public. Twelve people attended, including the Mayor of Frankfort, a city council member, employees from city and county government, and members of the public.

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

ATSDR

IDEM

City of Frankfort

Clinton County Health Department

4. Personnel On Site

1 EPA OSC

7 ERRS

1 START

Personnel demobilized from the Site on December 20, 2010.

5. Definition of Terms

ATSDR	Agency for Toxic Substances and Disease Registry
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
ERRS	Emergency and Rapid Response Services
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
OSC	On-Scene Coordinator
ppm	parts per million
PRG	Preliminary Remediation Goal
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
START	Superfund Technical Assessment and Response Team
TCLP	Toxicity Characteristic Leachate Procedures
U.S. EPA	United States Environmental Protection Agency
XRF	X-Ray Fluorescence

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be found at www.epaosc.org/indianabrass.

6.2 Reporting Schedule

The next POLREP will be submitted when work is complete in the spring of 2011.

7. Situational Reference Materials

Not applicable.

POLREP #11 Last Updated 12/20/2010