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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #12**
Final PolRep
Indiana Brass
B5XQ
Frankfort, IN
Latitude: 40.2806000 Longitude: -86.5198000

To:
From: Shelly Lam, On-Scene Coordinator
Date: 6/2/2011
Reporting Period: June 1-17, 2011

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:	6/3/2011	**Completion Date:**	6/17/2011
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 was 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 the 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

On June 1, 2011, EPA remobilized to the Site to complete backfill and final grading. The ERRS crew completed this work and demobilized on June 3rd. On June 17, 2011, a subcontractor completed hydroseeding of the Site. Additionally, EPA recompensed the adjoining property owner for damages incurred to his building during removal actions. Compensation was equal to the amount of repairs to the building by the lowest of three bidders.

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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
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

No additional removal actions are planned.

2.2.1.2 Next Steps
Removal actions have been completed. No additional activities are planned.

2.2.2 Issues
None

2.3 Logistics Section
Not applicable (NA)

2.4 Finance Section
No information available at this time.

2.5 Other Command Staff
2.5.1 Safety Officer
The OSC was the Site Safety Officer.

2.6 Liaison Officer
Not applicable.

2.7 Information Officer
2.7.1 Public Information Officer
NA

2.7.2 Community Involvement Coordinator (CIC)
NA

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
2 ERRS
1 START

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
No additional PolReps will be submitted.

7. Situational Reference Materials
Not applicable.