U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Advance Plating Works - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #4**
Progress PolRep
Advance Plating Works
C589
Indianapolis, IN
Latitude: 39.7152000 Longitude: -86.1417000

To:
From: Shelly Lam, On-Scene Coordinator
Date: 12/23/2011
Reporting Period: December 19 - 23, 2011

1. Introduction

1.1 Background

Site Number:	C589	**Contract Number:**	EP-S5-09-05
D.O. Number:	0082	**Action Memo Date:**	12/5/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:		**Operable Unit:**	
Mobilization Date:	9/20/2011	**Start Date:**	9/20/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time-Critical Removal - Former plating shop

1.1.2 Site Description
The Site is the former Advance Plating Works. It was a family-owned business that operated on the south side of Indianapolis. Former operations at the facility included nickel, chrome, zinc, cadmium, and copper plating. During an interview with the current owner's stepson on December 22, 2011, EPA learned that Advance Plating Works had been in business in 1912 but had only been at the current location since the 1970's. Prior to ownership by Advance Plating Works, the Site was previously a slaughterhouse, cannery, and wax factory.

The Site is 3 acres in size and includes two buildings, one of which was formerly used for plating operations and office space and a second building, which was used as a warehouse.

1.1.2.1 Location
The Site is located at 1005 E. Sumner Avenue in Indianapolis, Marion County, Indiana. Site coordinates are latitude 39.7152000 degrees north and longitude 86.1417000 degrees west. The facility is in an area of the south side of Indianapolis that is primarily industrial and commercial. However, there is a residential facility adjacent to the Site to the east and additional residential properties within a few hundred feet to the northeast.

1.1.2.2 Description of Threat
On September 20, 2011, the Marion County Public Health Department (MCPHD) responded to the Site based on abandoned building and trespassing complaints from the Indianapolis Metropolitan Police Department (IMPD). Upon arriving at the Site, MCPHD personnel observed 25-30 drums stored in poor condition outside the buildings. Additionally, MCPHD noticed that building doors were open and a section of fence had been removed to allow access for trespassing. MCPHD immediately requested assistance from the Indiana Department of Environmental Management (IDEM) and U.S. Environmental Protection Agency (EPA).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
EPA On-Scene Coordinator (OSC) Shelly Lam responded to the Site on the afternoon of September 20th, where she met with representatives from MCPHD and the property owners. After obtaining access, OSC Lam conducted a reconnaissance and documented 75-100 drums, totes, plating vats and other containers inside and outside the facility buildings. Many drums were unlabeled. However, 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.

EPA completed an inventory of drums and containers on September 22, 2011. EPA documented 164 drums, ten 275-gallon totes, hundreds of small containers, 6 plating vats, and 5 pits/sumps. Identified materials included sodium hydroxide, hydrogen peroxide, potassium cyanide, sodium cyanide, sulfuric acid, hydrocyanic acid, nitric acid, and paint thinner. Based on this information, OSC Lam determined 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.

Analytical results from the Site Assessment verified that hazardous substances were present on-Site. EPA collected six samples from drums and a small container during the Site Assessment. Four samples exhibited a pH less than 2 standard units (SU) and one sample had a pH of 13.5 SU, meeting the characteristic of corrosivity per 40 Code of Federal Regulations (CFR) 260.22(a)(1). One sample had a flashpoint of 110 degrees Fahrenheit, which is below the characteristic for ignitability, per 40 CFR 261.21(a)(1). Total and reactive cyanide were detected in one sample at concentrations of 15,000 milligrams per kilogram (mg/kg) and 1,300 mg/kg, respectively.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 20, 2011, EPA responded to a request for assistance from MCPHD regarding abandoned drums at a former plating facility. EPA conducted emergency response operations from September 20 - 22, 2011, including segregating, staging, and securing drums. EPA signed an Action Memorandum on December 5, 2011 to complete time-critical removal activities including developing site plans such as a site-specific Health and Safety Plan (HASP), Emergency Contingency Plan, and work plan; inventorying and performing hazard categorization on substances contained in vats, pits, drums, and other containers; performing sampling and analysis to determine disposal options; dismantling and decontaminating process equipment and building components associated with plating operations; and consolidating and packaging hazardous substances, pollutants, and contaminants for transportation and off-Site disposal in accordance EPA's Off-Site Rule.

2.1.2 Response Actions to Date

During the reporting period, EPA conducted the following activities:

- Approved profiles for hazardous and non-hazardous debris;
- Began cleaning wastewater treatment area;
- Began pumping liquids from Vat 1 into totes;
- Cleaned solids and sludge out of 4 vats in wastewater treatment area;
- Cut debris prior to disposal;
- Worked on reconnecting electricity;
- Received non-hazardous waste roll off box;
- Received hazardous waste roll off box;
- Began filling the hazardous waste roll off box with contaminated solid debris;
- START has performed work area and perimeter air monitoring during all activities;
- Distributed Emergency Contingency Plan to the IMPD and the Indianapolis Fire Department;
- Handed out fact sheets to local residents and businesses; and
- Maintained Site security.

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

Information on the PRP is in the Site file.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Pending					

R5 Priorities Summary		
Integrated River Assessment	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
Stand Alone Assessment	Acres Protected	
	Number of contaminated residential yards cleaned up	
	Human Health Exposures Avoided	

	Number of workers on site

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will continue with removal activities during daylight hours on weekdays. EPA is securing the facility for non-operational overnight and weekend periods using a contracted security service. The removal action is expected to last 2-3 months.

2.2.1.1 Planned Response Activities

During the next reporting period, EPA will conduct the following activities:

- Continue removing and containerizing wastes in vats in wastewater treatment area;
- Staging hazardous debris for disposal; and
- Maintain Site security.

2.2.1.2 Next Steps

Over the next few weeks, EPA will begin hazard characterization of the totes, drums, and smaller containers.

2.2.2 Issues

See PolRep #3.

2.3 Logistics Section

2.3 Logistics

ERRS is providing logistical support including:

- Temporary worksite trailers;
- Bathroom facilities;
- Electrical contractors to restore power;
- Water and plumbing service;
- Trash service;
- Drinking water;
- Security contractors for non-operational hours overnight, weekends, and holidays;
- Temporary lighting inside the facility; and
- Temporary space heaters inside the facility to facilitate removal activities.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Lam is the overall Safety Officer for the response. EPA's contractors have prepared a health and safety plan. Additionally, all personnel are attending daily safety briefings.

2.6 Liaison Officer

Not applicable (NA)

2.7 Information Officer

2.7.1 Public Information Officer

EPA has not received any media requests. Joshua Singer is the Public Information Officer for the Site. The Office of Public Affairs (OPA) will issue a press release when time-critical activities are complete.

2.7.2 Community Involvement Coordinator

The community involvement coordinator is Susan Pastor, who has established a website and coordinated a fact sheet for distribution.

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

IDEM
MCPHD

4. Personnel On Site

The following personnel were on-Site during the reporting period.

Agency	Position	# Personnel
EPA	OSC	2

	ERT	1
ERRS	Response Manager	1
	Foreman	1
	Equipment Operator	1
	Laborer	3
START		1

5. Definition of Terms

CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
ERRB	Emergency Response and Removal Branch
ERRS	Emergency and Rapid Response Services
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
IMPD	Indianapolis Metropolitan Police Department
MCPHD	Marion County Public Health Department
mg/kg	milligrams per kilogram
NA	Not Applicable
OPA	Office of Public Affairs
OSC	On-Scene Coordinator
PolRep	Pollution Report
PRP	Potentially Responsible Party
START	Superfund Technical Assessment and Response Team
SU	Standard Units

6. Additional sources of information

6.1 Internet location of additional information/report

Refer to www.epaosc.org/advanceplatingworks and www.epa.gov/Region5/cleanup/advanceplating/ for additional information.

6.2 Reporting Schedule

The OSC will submit the next PolRep the week of January 3, 2012.

7. Situational Reference Materials

NA