

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** **POLREP #6**  
**Progress PolRep**  
**Advance Plating Works**  
**C589**  
**Indianapolis, IN**  
**Latitude: 39.7152000 Longitude: -86.1417000**

**To:** Sherry Fielding, U.S. EPA  
Jason El-Zein, U.S. EPA  
Charlie Gebien, U.S. EPA  
Mark Durno, U.S. EPA  
Gaylene Vasaturo, U.S. EPA  
Thomas Marks, U.S. EPA  
Cheryl McIntyre, U.S. EPA  
Anne Rowan, U.S. EPA  
Beverly Kush, U.S. EPA  
Sue Pastor, U.S. EPA  
John Glover, U.S. EPA  
Valencia Darby, Department of Interior  
Andrew Raddant, Department of Interior  
Mark Johnson, ATSDR  
Gabriele Hauer, IDEM  
Harry Atkinson, IDEM  
Max Michael, IDEM  
Bill Myers, IDEM  
Rex Osborn, IDEM  
Pam Thevenow, Marion County Health Department  
Jeff Larmore, Marion County Health Department  
Eric Kaufman, MCHD  
Sean Hurley, MCPHD  
Luke Ricke, MCPHD  
Fred Schwoymeyer, Indianapolis Fire Department

**From:** Shelly Lam, On-Scene Coordinator  
**Date:** 1/20/2012  
**Reporting Period:** January 16 - 20, 2012

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	C589	<b>Contract Number:</b>	EP-S5-09-05
<b>D.O. Number:</b>	0082	<b>Action Memo Date:</b>	12/5/2011
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	9/20/2011	<b>Start Date:</b>	9/20/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	INN000510649	<b>RCRIS ID:</b>	IND985059898
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**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 140 degrees Fahrenheit, meeting 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**

The OSC closed the Site the week of January 9, 2012, for training. During the week of January 16th, EPA conducted the following activities:

- Conducted hazard categorization on small containers;
- Segregated wastes by waste stream;
- Began removing fluorescent light bulbs and ballasts;
- Prepared Polishing and Zinc/Nickel Plating Rooms for pressure washing;
- Conducted air monitoring using AreaRAEs and Single Point Monitors;
- Shipped one load of hazardous debris off-Site for disposal; and
- Maintained Site security.

EPA conducted Green Initiatives during the removal action including recycling of paper, plastic, glass, aluminum, ink cartridges, and scrap metal. EPA is also using alternative fuel in government vehicles and recycled paper products.

#### **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**

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Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Hazardous waste solids	Solid	20 yards	MID000724831		Michigan Disposal Waste Treatment Plant

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	3
	Number of contaminated residential yards cleaned up	0
	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

EPA will shut down the site from January 30 - February 6, 2012, because EPA will be involved with Super Bowl operations. During the week of January 23, 2012, EPA will conduct the following activities:

- Bulk waste for disposal;
- Continue waste disposal;
- Finish removing fluorescent light bulbs and ballasts;
- Pressure wash rooms within the facility;
- Stage hazardous debris for disposal; and
- Maintain Site security.

#### 2.2.1.2 Next Steps

EPA will dispose of waste in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Off-Site Rule.

### 2.2.2 Issues

None

## 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

### 2.4.1 Narrative

On January 4, 2012, Emergency Response and Removal Branch (ERRB) Chief Jason El-Zein authorized a \$200,000 increase for the Task Order. ERRS costs are current through January 18, 2012, and include costs from emergency response and time-critical removal activities. START costs are current through

January 13, 2012, and only include costs for time-critical removal activities.

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$325,000.00	\$154,911.91	\$170,088.09	52.33%
TAT/START	\$25,000.00	\$19,500.00	\$5,500.00	22.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$350,000.00</b>	<b>\$174,411.91</b>	<b>\$175,588.09</b>	<b>50.17%</b>

\* 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**

OSC Lam is the overall Safety Officer for the response. EPA's contractors have prepared a health and safety plan (HASP). 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
ERRS	Response Manager	1
	Foreman	1
	Laborer	4
	Field Cost Accountant	1
	Chemist	1
START		1

**5. Definition of Terms**

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
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](http://www.epaosc.org/advanceplatingworks) and [www.epa.gov/Region5/cleanup/advanceplating/](http://www.epa.gov/Region5/cleanup/advanceplating/) for additional information.

### **6.2 Reporting Schedule**

The OSC will submit the next PolRep the week of January 23, 2012.

## **7. Situational Reference Materials**

NA

POLREP #6 Last Updated 1/20/2012