

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #9  
Progress PolRep  
Advance Plating Works  
C589  
Indianapolis, IN  
Latitude: 39.7152000 Longitude: -86.1417000

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**From:** Shelly Lam, On-Scene Coordinator

**Date:** 2/24/2012

**Reporting Period:** February 13 - 24, 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, the U.S. Environmental Protection Agency (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 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**

During the period from February 13 to 24, 2012, EPA conducted the following activities:

- Repackaged waste into shippable containers;
- Swept Zinc Plating Room;
- Pressure washed Zinc Plating Room;
- Conducted air monitoring; and
- Maintained Site security.

EPA received the results of the water sample MCPHD collected from a nearby residential drinking water well. The sample was analyzed for bacteria, Resource Conservation and Recovery Act (RCRA) metals, volatile organic compounds (VOC), and anions. Bacteria and VOC were not detected. All concentrations were below Superfund Removal Action Levels (RAL) or Maximum Contaminant Levels (MCL). However, iron exceeded the

National Drinking Water Secondary Standard at a concentration of 2,030 micrograms per liter (ug/L). EPA established the secondary standard for iron at 300 ug/L.

EPA conducted Green Initiatives during the removal action including recycling of paper, plastic, glass, aluminum, ink cartridges, and scrap metal. EPA has recycled 5 pounds of plastic and 10 pounds of paper. EPA is also using alternative fuel in government vehicles and recycled paper products. There is also a policy for equipment and vehicle idling set at no more than 3 minutes for when the equipment is not in use. EPA is using the general grid for the electric power instead of generators, thereby reducing on-Site

carbon emissions. Additionally, all heaters are electric to cut back on fuel consumption.

**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
Hazardous waste solids	Solid	20 yards	008223069JJK		Michigan Disposal Waste Treatment Plant
Hazardous waste solids	Solid	20 yards	008223070JJK		Michigan Disposal Waste Treatment Plant
Non-hazardous debris	Solid	1.93 tons	1212326		Twin Bridges Landfill

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 be completed in mid-March.

**2.2.1.1 Planned Response Activities**

EPA will conduct the following activities:

- Finish waste disposal;
- Perform site closeout activities;
- Maintain Site security; and
- Demobilize from the Site.

**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**

The Emergency and Rapid Response Services (ERRS) contractors 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 February 22, 2012, and include costs from emergency response and time-critical removal activities. The Superfund Technical Assessment and Response Team (START) contractor costs are current through February 24, 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	\$249,547.81	\$75,452.19	23.22%
TAT/START	\$60,000.00	\$52,100.00	\$7,900.00	13.17%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$385,000.00</b>	<b>\$301,647.81</b>	<b>\$83,352.19</b>	<b>21.65%</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 site-specific 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. 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	3
	Field Cost Accountant	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
MCL	Maximum Contaminant Level
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
RAL	Removal Action Level
RCRA	Resource Conservation and Recovery Act
START	Superfund Technical Assessment and Response Team
SU	Standard Units
ug/L	micrograms per liter
VOC	Volatile Organic Compounds

## **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 Pollution Report (PolRep) when removal activities are complete.

## **7. Situational Reference Materials**

NA

POLREP #9 Last Updated 2/24/2012