

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #10**
Final 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: 3/19/2012

Reporting Period: February 27 - March 12, 2012

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:	Non NPL	Operable Unit:	
Mobilization Date:	9/20/2011	Start Date:	9/20/2011
Demob Date:	3/12/2012	Completion Date:	3/12/2012
CERCLIS ID:	INN000510649	RCRIS ID:	IND985059898
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, 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. EPA finalized time-critical removal actions on March 12, 2012, and completed the scope of work outlined in the Action Memorandum.

2.1.2 Response Actions to Date

During the period from February 27 - March 12, 2012, EPA conducted the following activities:

- Decommissioned plating and wastewater vats;
- Swept and pressure-washed wastewater treatment room;
- Disposed of remaining waste;
- Conducted air monitoring; and
- Maintained Site security.

EPA demobilized from the Site on March 12, 2012.

EPA conducted Green Initiatives during the removal action including recycling of paper, plastic, glass, aluminum, ink cartridges, and scrap metal. EPA recycled 15 pounds of plastic and 64 pounds of paper. EPA and its contractors used 100% post consumer recycled paper in copiers and printers. EPA also used alternative fuel in government vehicles and recycled paper products. Personnel adhered to a Site policy for equipment and vehicle idling set at no more than 3 minutes for when the equipment is not in use. EPA used the general grid for the electric power instead of generators, thereby reducing on-Site carbon emissions. Additionally, all heaters were 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 (F008, D006, D007, D008)	Solid	20 yards	008223069JJK	NA	Michigan Disposal Waste Treatment Plant
Hazardous waste solids (F008, D006, D007, D008)	Solid	20 yards	008223070JJK	NA	Michigan Disposal Waste Treatment Plant
Hazardous waste solids (F008, D006, D007, D008)	Solid	20 yards	008223071JJK	NA	Michigan Disposal Waste Treatment Plant
Hazardous waste liquids (D007)	Liquid	29,600 pounds	009122990JJK	NA	EQ Detroit
Non-hazardous debris	Solid	1.93 tons	1212326	NA	Twin Bridges Landfill
Hazardous Waste Liquids (D007)	Liquid	53,600 pounds	009122854JJK	NA	EQ Detroit
Hazardous Waste Solids (D006)	Solid	9,000 pounds	009122860JJK	NA	Michigan Disposal Waste Treatment Plant
Hazardous Waste Solids (D006)	Solid	33,000 pounds	009122856JJK	NA	Michigan Disposal Waste Treatment Plant
Hazardous Waste Solids (F008, D006, D007, D008)	Solid	20 yards	009122855JJK	NA	Michigan Disposal Waste Treatment Plant
Waste Corrosive Liquid, Acidic, Inorganic (D002, D006, D007)	Liquid	4500 pounds	009122858JJK	NA	EQ Detroit
Waste Corrosive Liquid, Basic, Inorganic (D002, D007, D010)	Liquid	1800 pounds	009122854JJK	NA	EQ Detroit
Waste Corrosive Liquid, Basic, Inorganic (D002)	Liquid	1500 pounds	009122854JJK	NA	EQ Detroit
Waste Corrosive Liquid, Basic, Inorganic (D002, D007, D010)	Liquid	2000 pounds	009122854JJK	NA	EQ Detroit
Waste Corrosive Liquid, Basic, Inorganic (D001, D002)	Liquid	1500 pounds	009122863JJK	NA	EQ Detroit
Waste Corrosive Liquid, Basic, Inorganic (D002, D007, D010)	Liquid	1800 pounds	009122862JJK	NA	EQ Detroit

Waste Corrosive Liquid, Basic, Inorganic (D002, D007, D010)	Liquid	2000 pounds	009122862JJK	NA	EQ Detroit
Waste Cyanide Solutions (D003, D006, D007, D008)	Liquid	5500 pounds	009122854JJK	NA	EQ Detroit
Waste Cyanides, Inorganic, Solid (D003, D007)	Solid	4500 pounds	009122854JJK	NA	EQ Detroit
Waste Flammable Liquids (D001, D005)	Liquid	2250 pounds	009122858JJK	NA	EQ Detroit
Waste Hydrogen Peroxide, aqueous (D001)	Liquid	250 pounds	009122858JJK	NA	EQ Detroit
Waste Nitric Acid (D001, D002)	Liquid	5 pounds	009122862JJK	NA	EQ Detroit
Waste Oxidizing Liquid, Corrosive (D001, D002, D005, D007, D008, D010)	Liquid	3500 pounds	009122858JJK	NA	EQ Detroit
Waste Oxidizing Liquid, Corrosive (D001, D002, D005, D006, D007)	Liquid	1500 pounds	009122858JJK	NA	EQ Detroit
Waste Oxidizing Solid, Corrosive (D001, D002, D007)	Solid	800 pounds	009122858JJK	NA	EQ Detroit
Waste Oxidizing Solid, Corrosive (D001)	Solid	800 pounds	009122858JJK	NA	EQ Detroit

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	3800
	Number of workers on site	10

2.2 Planning Section

2.2.1 Anticipated Activities

EPA has completed time-critical removal activities.

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

EPA will refer the Site to IDEM for any future remedial actions.

2.2.2 Issues

None

2.3 Logistics Section

2.3 Logistics

The Emergency and Rapid Response Services (ERRS) contractors provided 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

ERRS costs are current through March 5, 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 March 16, 2012, and only include costs for time-critical removal activities. Final costs are pending.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$375,000.00	\$282,769.11	\$92,230.89	24.59%
TAT/START	\$89,000.00	\$68,000.00	\$21,000.00	23.60%
Intramural Costs				
Total Site Costs	\$464,000.00	\$350,769.11	\$113,230.89	24.40%

* 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 was the overall Safety Officer for the response. EPA's contractors prepared a site-specific HASP. Additionally, all personnel attended daily safety briefings.

2.6 Liaison Officer

Not applicable (NA)

2.7 Information Officer

2.7.1 Public Information Officer

The Office of Public Affairs (OPA) issued a press release on March 9, 2012. There were no media inquiries.

2.7.2 Community Involvement Coordinator

The community involvement coordinator is Susan Pastor, who 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

CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
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 not submit any additional Pollution Reports (PolRep).

7. Situational Reference Materials

NA

POLREP #10 Last Updated 3/19/2012