

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Carrier-Bryant - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial POLREP
Carrier-Bryant
C5C6
Indianapolis, IN
Latitude: 39.7978120 Longitude: -86.1819990

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From: Jason Sewell, On-Scene Coordinator
Date: 12/11/2012
Reporting Period: 12/07/2012 - 12/12/2012

1. Introduction

1.1 Background

Site Number:	C5C6	Contract Number:	EP-S5-09-05
D.O. Number:	109	Action Memo Date:	10/3/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	12/3/2012	Start Date:	12/7/2012
Demob Date:		Completion Date:	
CERCLIS ID:	INN000510693	RCRIS ID:	IND000810770
ERNS No.:		State Notification:	IDEM
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) incident category:
Inactive Production Facility

1.1.2 Site Description

The Site is a former Carrier-Bryant facility used for manufacturing and assembly of furnaces and air conditioners from 1955 to the 1984. Carrier moved to another facility and sold the property to St. Clair Properties in 1985. AAA Warehouse operated the Site from approximately 1984 into the 1990s storing pesticides, electronics, bulk starches, and other products. By 2001, the Site was vacated and an environmental assessment was performed on behalf of a bank. No sale followed and the property was abandoned and allowed to fall into disrepair.

The Site is 20 acres of land with 10 acres under roof. Site buildings include three large manufacturing/warehouse buildings, a boiler house, a smoke stack, and a maintenance building.

With the Site being unoccupied, trespassing, vandalism, vagrancy, open burning and open dumping have occurred. The perimeter fence was ineffective including: missing panels, damaged gates, and large holes in panels. The Site was open to foot or vehicle traffic on all four boundaries. Metal scrappers have removed steel structure, piping and wiring from Site buildings. The county health department housing division has

boarded Site Buildings in the past, however, most manway doors, overhead vehicle doors, and windows are broken, dislodged or missing.

1.1.2.1 Location

The Carrier-Bryant Site is located at 1100 W 21st Street, Indianapolis, Marion County, Indiana, 46202. The area is mixed use and the Site is bordered by residential housing, several churches, a daycare, commercial businesses, and light industry. The 2000 Census recorded approximately 8600 residents within a half mile of the Site. A public school is 550 feet west of the Site entrance. The Site is in the municipal well-head protection area - 1 year time of travel. The Indianapolis Water Company Canal, a surface drinking water source, is 900 feet east. Fall Creek is 700 feet east and the White River is 3000 feet west.

The geographical coordinates for the Site entrance are 39.795653 north latitude and 86.181961 west longitude.

1.1.2.2 Description of Threat

In 2011, the City of Indianapolis commissioned an environmental site assessment for the Site. The assessment documented abandoned drums, aboveground storage tanks, underground storage tanks, smaller containers, and friable asbestos open to the environment. The Site was vacant and open to foot and vehicle traffic.

In January 2012, the City of Indianapolis verbally requested U.S. EPA assistance with abandoned hazardous substances, pollutants or contaminants at the Site. The City and Indiana Department of Environmental Management followed with respective letters requesting EPA assistance at the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA and the Superfund Technical Assessment and Response Team contractor (START) performed a site assessment on February 7, 2012 and documented abandoned drums, storage tanks, and containers as well as unsecured perimeter fencing and signs of trespassing. Drums were present vandalized, degraded, leaking, or turned over. Five underground storage tanks were present at the Site, one of which was recorded as having been used for storing paint. EPA collected a total of two drum liquid samples and five asbestos samples that were submitted for laboratory analysis (Flash Point, TCLP VOCs, pH, asbestos). Prolific metal scrapping at the Site resulted in asbestos insulation being torn away from boilers and steam pipes. Asbestos had been bagged and placed outside the boiler house. Years of weathering degraded the trash bags, and friable asbestos became open to the environment both in exterior piles as well as from inside the boiler house. Large windows and doorways are missing from the boiler house, and friable asbestos is present in piles on the boiler house floor.

The Site perimeter fence had missing panels, gates were pushed open, and holes were cut where foot paths crossed the property. Trespassing occurs as a matter of routine foot traffic to cross through the property. Vehicles were accessing the property, driving into Site buildings, and dumping solid waste. Vandalism had occurred, including damaging or overturning drums.

Laboratory analysis of samples collected during the site assessment confirmed hazardous substances as VOCs in drum sample CBS-DRUM1 (Methyl Ethyl Ketone, Trichloroethylene), characteristic hazardous waste for ignitability in drum sample CBS-DRUM1, and friable asbestos open to the environment around the Site boiler house.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA completed a removal site evaluation for the Site and documented a release or threatened release of hazardous substances including friable asbestos open to the environment, characteristic ignitable waste, and listed toxic wastes. The Site threatens public health and welfare through unrestricted access and the presence and nature of the unsecured hazardous substances, pollutants or contaminants.

EPA is pursuing congruent processes of Enforcement First as well as a fund lead time-critical removal action in order to be protective of public health. PRPs were identified, however, PRPs have failed to take action as of December 14, 2012.

In accordance with OSWER Directive 9360.0-19, EPA Region 5 sought and received EPA Headquarters concurrence for a time-critical removal action addressing asbestos at a Site not on the National Priorities List (NPL). The Action Memorandum was approved October 3, 2012, and the ERRS Task Order was issued November 8, 2012. EPA and its contractors began mobilizing to, and securing, the Site December 3, 2012.

EPA held a public availability session for this Site on November 13, 2012. The OSC has also attended two meetings involving the City and community organizations regarding activities at the Site.

2.1.2 Response Actions to Date

On December 2, 2012, the OSC issued an Emergency Response Contingency Plan including 24 hour contact numbers and instructions on how to access the EPA secured perimeter in the event of a public safety response. The plan was shared with the Indianapolis Fire Department, Indianapolis Metropolitan

On December 3, 2012, EPA, START, and ERRS mobilized to the Site to begin securing the property. The Site area is 20 acres and the perimeter fencing had numerous holes or otherwise missing sections that allowed routine foot traffic and motor vehicle access to and through the property. Residents on foot or bicycles were attempting to cross the property even as EPA contractors were erecting replacement fence panels. Securing the facility perimeter took several days and included the following tasks:

- Movement of solid waste, including open burn piles, tires and roofing debris away from facility entrances and driveways.
- Establishment of the EPA Site office, including electrical service, sanitary facilities, and EPA perimeter and office signage.
- Establishment of 24 hour security including guards and patrols.
- Placement of concrete "jersey" barriers in front of select facility gates to discourage unauthorized vehicle access.
- Re-hanging and closing existing facility gates.
- Establishing 2 usable, and locked facility entrances for EPA and public safety (Fire and Police have access through EPA locks).
- Closing and mending of gaps in the fence to discourage foot access. And,
- Clearing and grubbing of vegetation to allow access to perimeter gates, abandoned drums, and the boiler house.

Between December 7 and December 12, 2012, EPA contractors completed the following tasks directly related to hazardous substances, pollutants, or contaminants:

- Inventory and labeling of drums, storage tanks, and other containers.
- Over-packing or transferring contents of leaking drums into salvage, over-pack drums.
- Field hazard characterization of drum contents to establish safe, compatible storage requirements.
- Consolidation of drums into a secure, metal storage box pending potential PRP disposal.
- Field assessment of aboveground and underground storage tanks for possible hazardous substances.
- Collection of samples from the 'paint' underground storage tank. Samples were delivered for lab analysis.
- Securing of manways and overhead doors on Site buildings (2, 3, and 5) where drums have been removed but interior friable asbestos remains an exposure risk.
- Implementation of the Site Air Monitoring Plan, including background and work area sampling for asbestos.
- Movement of visible bulk friable asbestos from the exterior of the boiler house to the interior.
- Securing temporary closures on doorway and window openings on boiler house.

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

EPA identified three PRPs. General notice letters and CERCLA Section 104(e) information requests to all three PRPs. One party has expressed interest in negotiating performance of some, but not all, removal activities. EPA submitted an Agreed Order on Consent (AOC), the agreement is not yet finalized. The two remaining PRPs claim a lack of assets to perform or fund removal actions. EPA is performing a financial assessment/ability to pay (ATP) analysis.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Drums	liquid				
Waste Paint (UST)	liquid/sludge	TBD			
(Asbestos) ACM, Debris	Solid	TBD			

2.2 Planning Section

2.2.1 Anticipated Activities

EPA anticipates the following activities;

1. Finalizing an agreement with at least one PRP to perform removal activities. Anticipated activities include:
 - PRP selection of, and EPA approval of, removal contractors,
 - PRP contractor generation of, and EPA approval of, site work and monitoring plans,
 - Waste characterization and off-site disposal of drummed wastes at an approved disposal facility,
 - Characterization of wastes in underground storage tanks,
 - Assessment of releases of hazardous substances from underground storage tanks.
2. Removal and off-site disposal of bulk, friable asbestos and co-mingled solid waste and debris from the boiler house area by EPA contractors.
3. Maintaining Site Security during periods of EPA contractor mobilization.
4. Implementation of the Site Air Monitoring Plan to ensure removal actions do not result in increased risk of off-site migration of, or exposure to hazardous substances, pollutants, or contaminants.

2.2.1.1 Planned Response Activities

In the absence of PRP actions to date, EPA has taken measures to stabilize drums, secure and prevent

exposures to drummed wastes, and determine contents of storage tanks. EPA plans on reaching an agreement with one or more PRPs to perform waste characterization and disposal of wastes in drums and underground storage tanks, and to assess the threat of release from underground storage tanks.

Asbestos removal work involves spraying asbestos contaminated debris with water during removal activities to reduce generation of airborne asbestos fibers. Due to sub-freezing temperatures, EPA is planning on post-poning asbestos removal work until such time as weather conditions do not interfere with wet, asbestos removal activities. EPA is taking measures to secure the Site perimeter, and access to Site buildings where exposure would occur. Demobilization of contractors and temporary office facilities is planned for the week of December 17th. The estimated date for remobilization is March 1, 2013 and is based on historical, annual temperatures. Mobilization may occur before or after March 1st depending on actual weather conditions.

Due to the pattern of trespass and vandalism at the Site, EPA will coordinate period inspections with the Indianapolis Metropolitan Police Department to ensure perimeter security is intact and the potential for access or exposure to hazardous substances, pollutants, or contaminants is reduced.

2.2.1.2 Next Steps

- Finish securing Site buildings.
- Demobilize EPA contractors.
- Continue pursuing PRP agreement.

2.2.2 Issues

The Site is in an Environmental Justice community. The OSC and Community Involvement Coordinator reached out to the community through passing out fact sheets in the neighborhood, mailing fact sheets to a half mile radius, holding a public availability session, establishing a dedicated website, and establishing a monthly post card mailer at residents' request.

The OSC received an inquiry whether EPA would be testing residential yards in the neighborhood as a part of the removal action. The resident was concerned about health problems that could be related to the Site. The OSC referred the information to the Agency for Toxic Substances and Disease Registry (ATSDR) and the Marion County Public Health Department's Epidemiology Administrator. The Health Department conferred with the concerned resident and reported no findings to support an exposure related health condition.

A resident expressed concern about the fact that EPA would be securing the site perimeter. Residents who have been traversing the Site for years to walk to church, or school children who cross the Site after school, would have to walk a longer route to their destination.

A resident was concerned about removal actions displacing rats, dogs and other wild animals from the Site and into the neighborhood. The OSC coordinated reporting these concerns to the county vector control (rodent control) authority and the City animal control authority.

2.3 Logistics Section

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Site is being secured. All wastes will be in locked or boarded up structures between EPA mobilization periods.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$412,012.00	\$62,666.20	\$349,345.80	84.79%
TAT/START	\$40,000.00	\$23,847.00	\$16,153.00	40.38%
Intramural Costs				
USEPA - Direct	\$40,000.00	\$4,200.00	\$35,800.00	89.50%
Total Site Costs	\$492,012.00	\$90,713.20	\$401,298.80	81.56%

* 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 - Jason Sewell
ERRS RM - Richie Byrd, ER

2.5.2 Liaison Officer

OSC - Jason Sewell

2.5.3 Information Officer

OSC - Jason Sewell
CIC - Cheryl Allen

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

-The City of Indianapolis, Division of Economic Development, Brownfields Program
-Marion County Public Health Department: Hazardous Materials, Vector Control, Epidemiology
-Indiana Department of Environmental Management

4. Personnel On Site

4.0 Personnel On Site

U.S. EPA - 1
START - 1
ERRS - 5

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

<http://www.epa.gov/region5/cleanup/carrierbryant/index.html>

www.epaos.org/carrierbryant

6.2 Reporting Schedule

The next POLREP will be issued when EPA has demobilized for weather the week of December 17, 2012.

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 5/14/2013