

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Advanced Medical Systems - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Emergency Response- Initial POLREP
Advanced Medical Systems
C56V
Cleveland, OH
Latitude: 41.5546640 Longitude: -81.5631430

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From: Stephen Wolfe, On-Scene Coordinator

Date: 6/18/2016

Reporting Period: 06/15/2016 through 06/17/2016

1. Introduction

1.1 Background

Site Number:	C56V	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/15/2016	Start Date:	6/15/2016
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

1.1.2.1 Location

The site is located at 1020 London Road, Cleveland, Ohio. The geographical coordinates are Latitude 41.5526 degrees N and longitude 81.56346 degrees W.

The site is located in a mixed residential, commercial, and industrial area. The Site is approximately 3.5

acres in size and includes an approximate 80,000 square foot building that is 2.5 stories tall and includes a basement. The entire property is fenced and all the windows to the facility are boarded. Railroad tracks border the property to the south, other commercial/industrial properties border the site to the west and east, and residential properties border the site to the north.

AMS manufactured sealed sources for teletherapy machines and ceased production in 1991. The manufacturing facility is a 80,000 sq. foot facility. Portions of this facility is contaminated with cobalt-60. AMS has removed and disposed of the cobalt-60 sources but residual radioactivity remain in the basement, hot cell area and the second floor ventilation room. AMS has surveyed and/or decontaminated the other portions of the building.

1.1.2.2 Description of Threat

The Radiation Safety Officer (RSO) for the site visits the site weekly to ensure site security and collect samples from the groundwater pumping system. The RSO observed that vandals had broken in the building, cut the power and began stripping copper wire throughout the building. The backup generator for the facility was not operational. Due to the loss of power, the groundwater pumping system was no longer operational and the basement was in danger of becoming flooded due to inclement weather forecasts. If the basement floods, a large amount of Cobalt-60 contaminated water could be generated.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA's On-Scene Coordinator met with the RSO, the Ohio Department of Health, Bureau of Environmental Health and Radiation Protection (OBEHRP) and the members of Cleveland Fire Department/HAZMAT personnel on June 15, 2016. The Cleveland Public Power Company was on-site and de-energized the power lines to the building.

All site water (roof drains, site drainage) collects in a sump located outside the building on the SW side. The Northeast Regional Sewer District plugged all lines leading from the facility in the 1990's due to Cobalt-60 contamination. The sump has a capacity of 3,000 gallons and was approximately 1/3 full at the time of the initial site walk.

A sampling regime was in place to provide assurance that surface water in contact with this facility is below a pre-established threshold for cobalt-60 activity before it is discharged to the parking lot. Due to the vandalism, this activity is no longer occurring.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

AMS has indicated they do not have the financial means to implement the remainder of the decommissioning plans. Because of this fact, OBRP has referred this site to Region 5 for assessment and possible cleanup. EPA assessed the property in the fall of 2015 and is evaluating the data generated.

OBRP and EPA contacted the Site owner and they indicated that they do not have the means to restore power to the property.

2.1.2 Response Actions to Date

On June 15, 2016, OBEHRP contracted with a hazardous materials cleanup company to provide temporary pumping of the sump into a storage tank. OBEHRP also contracted another company to seal the entrance to the building that the vandals gained access through. OBEHRP contractors remained on site overnight to continue pumping accumulated sump water as necessary.

On June 16, 2016, OBEHRP and EPA met to discuss short term actions. OBEHRP requested that EPA take over the temporary pumping operation, provide power to the building in order for the normal pumping operation to resume, and reinforce the barriers to the building that prevent access. EPA agreed to perform these actions.

On June 16, 2016, the EPA ERRS contractor was deployed to the site and assumed control of the hazmat contractor on site. EPA ERRS arranged for an electrician to visit the site on June 17th, and met with companies who can fabricate metal bars to be placed over the building windows for site security. The Ohio Environmental Protection Agency (OEPA) was on site and providing contact information to the OSC in the event consultation is required.

In the evening of June 16, 2016, OBEHRP and EPA learned that the RSO for the site resigned. Entry into the building requires an RSO escort and OBEHRP agreed to provide personnel for this activity. OBEHRP collected water samples from the sump outside the building and the sample collection sump inside the building.

On June 17th, 2016, EPA and OBEHRP entered the building to determine the best course of action for providing electricity to the pumps. An electrical contractor visited the site and indicated that the best course of action would be to install a new panel and run outlets to the priority areas. OBEHRP collected water samples from the outside sump and from the water in the temporary storage tank. Approximately 2,000 gallons of water has been pumped from the outside sump into the storage tank.

EPA will be providing site security during off-shift hours until the building can be further secured. EPA will also provide personnel to pump the outside sump into temporary storage as needed.

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

The PRP has been notified of the situation and was given a verbal order by EPA. The PRP indicated that

they do not have the means to perform the necessary work to resume the normal pumping operations. OBEHRP also contacted the PRP and ordered them to restore power to the facility and they refused. Due to the resignation of the site's RSO, OBEHRP also ordered the PRP to provide a new RSO for the site as required under the radiological license.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Continue temporary measures to pump water from the outside sump to temporary storage as needed

Restore power to the normal pumping operations

Secure access to the building

Sample water from the temporary storage tank, and discharge as appropriate

2.2.1.1 Planned Response Activities

An electrician will be on site the week of June 20th to restore power to the pumps. The electrician estimated 4 days to complete the required work.

Fabricate metal bars to place over the accessible windows. ERRS anticipates to receive bids on Monday, June 20th.

2.2.1.2 Next Steps

restore the power to the pumping system

2.2.2 Issues

The site RSO resigned and there is not anyone else that knows the site operations or locations of rooms. OBEHRP agreed to provide personnel to act as an RSO for site work inside the building. The PRP will have to provide a new RSO to take over the duties of site maintenance.

EPA contacted the ex-site RSO and was provided directions on where certain rooms were located.

2.3 Logistics Section

ERRS is providing logistics for the site

2.4 Finance Section

2.4.1 Narrative

On June 16, 2016, EPA Branch Chief Jason El-Zein verbally authorized \$50,000 to begin emergency actions at the site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$0.00	\$50,000.00	100.00%
Intramural Costs				
Total Site Costs	\$50,000.00	\$0.00	\$50,000.00	100.00%

* 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

OBEHRP is acting as the Radiation Safety Officer for the site. OBEHRP will provide as needed radiation safety training to personnel that need to enter the building as well as temporary dosimeters. OBEHRP will need to escort all workers throughout the building.

Personnel will only enter areas that are required to perform the necessary work. Historical data indicates that the levels of radiation in the areas that will be accessed are at background levels; however, these areas are still designated as controlled access requiring an RSO escort.

EPA/ERRS is acting as the general site safety officer.

EPA met with local law enforcement and the local fire department to explain the site situation.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

EPA

Ohio Department of Health, Bureau of Environmental Health and Radiation Protection (OBEHRP)

3.2 Cooperating Agencies

EPA

OBEHRP

Ohio Environmental Protection Agency

4. Personnel On Site

EPA 1

EPA contractors - 3

OBEHRP - 2-3

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 7/6/2016