

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
POLREP 2 - FINAL **Updated**
Advanced Medical Systems
C56V
Cleveland, OH
Latitude: 41.5546640 Longitude: -81.5631430

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From: Stephen Wolfe, On-Scene Coordinator

Date: 6/22/2016

Reporting Period: 06/18/2016 through 07/18/2016

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:	6/30/2016	Completion Date:	7/18/2016
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, OBEHRP 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.

OBEHRP 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 18th EPA provided personnel to pump any accumulated water to the frac tank. no inclement weather was in the forecast so EPA provided security guards beginning in the evening of June 18th through June 19th.

On June 20th, EPA and OBEHRP returned to the site. No groundwater accumulated in the sump over the weekend. EPA and ERRS developed a plan to further secure entry points into the building and Electricians were hired to begin restoring necessary power on June 21st. EPA provided site security in the evening hours.

On June 21st, EPA and OBEHRP returned to the site. The security guard reported smelling gas outside the building intermittently and when one room of the building was opened, OBEHRP reported that it smelled like natural gas. EPA investigated and did not detect any gas odors; however as a precaution, the gas lines were shut off to the building as there is no need for natural gas to be running to the building. Electricians were on site developing plans for the necessary work. Approximately 500 gallons of water was pumped from the outside sump due to overnight rain storm. OBEHRP personnel provided escorts throughout the building as necessary. EPA provided site security in the overnight hours.

From June 22nd through June 24th, EPA and OBEHRP were on site. OBEHRP were providing escorts throughout the building to workers as required by radiological guidelines. ERRS contractors began installing steel bars across all accessible windows to help prevent trespassing. Contracted electricians were on site and began installation of a new electrical panel. ERRS pumped water into the temporary storage tank as necessary. Inclement weather was predicted for the overnight hours on June 23rd and ERRS was on site overnight to manage water if necessary. Security guards were on site during off-shift hours.

No activities occurred on site on June 25th and June 26th. Twenty-four hour security guards were present (weekend).

On June 28th, EPA and OBEHRP were on Site. OBEHRP were providing escorts throughout the building to workers as required by radiological guidelines. ERRS completed installing steel bars across accessible windows. Electricians completed the installation of all necessary components and received the final completed inspection report to have power restored. Security guards were on site during off-shift hours.

On June 29th, EPA and OBEHRP were on Site. OBEHRP were providing escorts throughout the building to workers as required by radiological guidelines. Cleveland Public Power was on site and restored power to the new panel installed by the electricians. The entire water management system was tested and all components were in working order (pumps, composite sampler, etc). A path of lights was also installed by the electrician and was operable. OBEHRP had received analytical data for the water contained in temporary storage and it met direct discharge limits; therefore, that water was used to test the water management system. The front door lock was changed to limit the number of keys to the facility. Security guards were on site during off-shift hours.

On June 30th, EPA and OBEHRP were on Site. OBEHRP were providing escorts throughout the building to workers as required by radiological guidelines. The temporary storage tank had drained overnight into the sump for the water management system and the system worked as intended (pumped water through the system, pumps cycled on/off, etc). Electricians were on site to complete final work. A generator back-up system was tested and all components of the water management system can be operated by one generator if the building loses power. ERRS pressure washed the temporary storage tank for return. EPA and all contractors demobilized from site. Off-shift security was discontinued.

****UPDATED INFORMATION****

On July 7, 2016, OBEHRP reported additional vandalism at the AMS Site. Thieves cut the power to the building again and broke in through one of the bay (roll up) doors. Power was able to be restored to the pumping system.

Additional requests were received from OBEHRP to increase security at the site and EPA performed the following actions:

- 1) Repaired entrance gate to the facility on July 13th, 2016
- 2) Installed six solar powered motion detector lights around the building on July 14th, 2016
- 3) Cleared brush from around the building and welded external doors (leaving two exits) shut and further secured a window discovered after the brush clearing on July 18th, 2016.

OBEHRP arranged for the bay (roll up) doors to be secured by installing a cinderblock wall in the opening.

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

Regional Metrics

	Miles of river systems cleaned and/or restored	N/A
This is an Integrated River Assessment. The numbers should overlap.	Cubic yards of contaminated sediments removed and/or capped	N/A
	Gallons of oil/water recovered	N/A
	Acres of soil/sediment cleaned up in floodplains and riverbanks	N/A
Stand Alone Assessment	Number of contaminated residential yards cleaned up	N/A
	Number of workers on site	4
Contaminant(s) of Concern	Cobalt-60	

Oil Response Tracking

Estimated volume	Initial amount released	N/A
	Final amount collected	N/A
	FPN Ceiling Amount	N/A
CANAPS Info	FPN Number	N/A
	Body of Water affected	N/A

Administrative and Logistical Factors (Place X where applicable)

Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	X	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues		Explosives
AOC	Historic preservation issues		Residential impacts
UAO	NPL site		Relocation
DOJ involved	Remote location		Drinking water impacted
Criminal Charges Have Been Filed*	Extreme weather or abnormal field season		Environmental justice
Tribal consultation or coordination or other issuesX	Congressional involvement		High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year		Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established		Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	N/A	gallons

Unleaded Fuel Used	N/A	gallons
Alternative/E-85 Fuel Used	N/A	gallons
Electricity from electric company	N/A	kWh
Electric Company Name and Account #	N/A	
Electricity from sources other than the electric company	N/A	kWh
Solid waste reused	N/A	
Solid waste recycled	N/A	
Water Used	N/A	gallons

<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

None - response complete.

OBEHRP will resume oversight of the facility.

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

None

2.2.2 Issues

ERRS secured the windows with steel bars; however, there is currently no RSO in charge of the facility and there is not a daily presence of workers so trespass/vandalism is still a concern as evidenced by a second break in around July 7, 2016.

2.3 Logistics Section

ERRS is provided all logistics for the response

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. On June 22nd, 2016 EPA Branch Chief verbally authorized a ceiling increase of \$50,000 to complete emergency actions at the site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$68,000.00	\$32,000.00	32.00%
Intramural Costs				
USEPA - Direct	\$10,000.00	\$8,000.00	\$2,000.00	20.00%
USEPA - InDirect	\$3,000.00	\$1,000.00	\$2,000.00	66.67%
Total Site Costs	\$113,000.00	\$77,000.00	\$36,000.00	31.86%

* 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 - 3-4

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 #2 Last Updated 8/30/2016