United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Wednesday, June 29, 2005
From: Kenneth Rhame

To: Tim Johnson, IDEM

Subject: AMACOR RESIDENTIAL
1820 E 32nd Street, ANDERSON, IN
Latitude: 40.0869000
Longitude: -85.6581000

POLREP No.:	2	**Site #:**	B5BJ
Reporting Period:		**D.O. #:**	
Start Date:	2/17/2005	**Response Authority:**	CERCLA
Mob Date:		**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:	6/29/2005	**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description
AMACOR (Advanced Magnesium Alloy Corporation) is a magnesium recycling facility located at 1820 East 32nd Street, Anderson, Madison County, Indiana. The site is approximately five acres in size and contains three buildings (building A, B, and C) where separate steps of the recycling process occur The site is bordered to the south by 32nd Street and mixed residential neighborhoods, to the north by a property formerly owned by Delco Remy Division of General Motors, to the west by another manufacturing facility, and to the east by a drainage ditch. Further to the north are railroad tracks and State Road 232 and further south are residential neighborhoods, farmland, and some commercial/industrial properties. To the west of the site are residential neighborhoods and to the east is State Road 9 followed by commercial and industrial businesses. The nearest body of water is the White River, which is slightly more than one mile north of the site.

On January 14, 2005, a fire started at the AMACOR facility which remained un-contained for approximately 48 hours. The fire and smoke acted as a propellant for encapsulated asbestos insulation located atop a rubber membrane roofing material used in the facility buildings. The dispersal of the asbestos containing material (ACM) has affected approximately 1,300 residential properties within a radius as far as approximately two miles from the AMACOR facility. The suspect ACM ranges in size. AMACOR is currently leading site clean-up activities which include worker exposure assessments and eventually, homeowners assessments to determine risk from the suspect ACM. Efforts are being made by AMACOR to acquire access agreements from homeowners to further ongoing assessments and the over all clean-up operation.

Current Activities
1. Situation:

The Responsible Party (RP) agreed to continue and complete the removal action at the AMACOR facility. RP contractors initiated removal activities on 24 January 2005 to address asbestos contamination at the AMACOR facility. Additionally, facility clean-up activities continued while RP contractors began sampling and inspection in February at affected residential sites located south of the facility. RP contractor develops a written Work Plan in order to implement residential remediation activities to begin in April 2005.

2. Summary of Operations:

RP Contractor for asbestos removals at off-site and residential properties was HydroTech Environmental Consulting and Engineering, Inc. (HydroTech), of Anderson, Indiana. Access Agreements were obtained by AMACOR for approximately 600 residential parcels, to allow RP Contractors to begin removal of asbestos debris. Pulaski Park on East 38th Street asbestos debris removals were conducted by the RP prior to this time.

3. Actions taken:

From 28 March to 8 April, 2005, RP contractors began dismantling remains of the damaged AMACOR facility. Additionally, negotiations between AMACOR, IDEM and U.S. EPA continued, to ensure timely removals of asbestos debris from affected areas off-site.
On 4 February 2005, HydroTech initiated sampling of soils and air monitoring assessments in neighborhoods of affected residential areas. HydroTech provided AMACOR a Statement of Work (SOW) for the Recovery of Fire Debris from AMACOR Fire, dated March 2005. HydroTech provided AMACOR the Neighborhood Sampling Synopsis, dated 8 April 2005. This report compiled the sampling test results for a total seven tape-lift and thirty-four (34) soil samples that were collected and analyzed. Using the Polarize Light Microscopy (PLM-Qualitative) method, all sample results were shown as non-detect for asbestos. In addition, six rounds of air monitoring samples were conducted with a total of thirty-one (31) samples collected for analyses, using Phase Contrast Microscopy (PCM) method, with all test results non-detect.

On 1 April 2005, HydroTech conducted the Initial Exposure Assessment (IEA) to determine potential exposure to workers and potential impact to surrounding neighborhoods during the recovery of fugitive debris. Air monitoring tests conducted for 2 personal air samples utilizing PCM test methods and 5 perimeter air samples using Transmission Electron Microscopy (TEM) methods for analyses. Based on test results, worker exposure was shown to be well below Time-Weighted Averages (TWA) of 0.1 fiber per cubic centimeter for an eight-hour period. As well, the perimeter monitoring demonstrated that the activity would not expose workers to more than 1.0 fiber per cubic centimeter over the thirty-minute period for the Excursion Limit. Based on these results, HydroTech recommended that OSHA Construction Standards would allow the IEA to be regarded as a Negative Exposure Assessment (NEA) for workers and homeowners. Therefore, worker personal protective equipment used will be standard work clothes, utilizing rubber/nitrile gloves and water spray bottles for debris pick-up and removal into plastic bags for disposal. Additional documents prepared by HydroTech include the Health and Safety Plan (HASP), dated 13 April, 2005 and provided to AMACOR.

On 14 April 2005, the U.S. EPA On-Scene Coordinator was Mr. Ken Rhame, accompanied by Ms. Josi Clark, U.S. EPA and Weston START contractor, Matthew C. Stokes, C.H.M.M. (Indiana Licensed Asbestos Inspector No.191403115). The day's initial activities included the OSHA 2-hour asbestos training course administered by Mr. Cory Smith of HydroTech, for a total of twenty-six (26) laborers, three (3) AMACOR supervisors and three (3) HydroTech Supervisors. Mr. Ari Shaked, AMACOR Facilities Manager, initially addressed the group to introduce the project scope and encourage complete cooperation of those involved. Upon completion of training, Mr. Stokes met with Mr Ken Rhame and Josi Clark to mobilize off-site to begin oversight of residential property asbestos removal activities. A total three (3) teams of laborers and supervisors were assigned to residential property debris removals for those residences providing signed consent agreements to access properties. Each of three AMACOR supervisors were provided details of addresses and property owner names, and were considered in charge of directing laborers and the RP contractor, HydroTech. Debris Removal Team Nos. 1, 2 and 3 were assigned residential areas to target debris removal at East 41st Street, Carolina Drive and East 47th Street, respectfully. Teams were first broken out into groups of 3 laborers per residence to inspect front yards, backyards and landscaped areas for debris pick-up and removal. Within an hour or so of conducting the initial inspections and debris removal, Team No. 1 realigned to include all nine laborers to inspect and remove debris for a single residence until all debris had been removed. Seven laborers were provided bags and water bottles and formed into a straight row at one end of the yard. The row of persons moved slowly from one end of a yard to the other and screened the entire yard for debris to be removed. The other two laborers were assigned the ladder and given responsibility of checking gutters and down spouts for debris and subsequent removal.

Upon re-grouping after the lunch break and meetings between AMACOR and the U.S. EPA On-Scene Coordinator, these procedures were implemented for all three Teams for the remainder of the debris removal activities. The OSC oversight roll included real-time visual inspections of areas being screened by the Teams for debris removal. Upon completion of a Team screening a yard and removing debris, the OSC's and OSC contractor made visual inspections of debris removal areas to ensure complete removal and thoroughness of procedures. The effectiveness of this procedure became evident as complete removal of debris was documented in these areas.

On 15 April, 2005, OSC's and OSC contractor continued oversight activities for each of the three Debris Removal Teams at those areas most heavily affected. Initial areas targeted were those residential areas south of the AMACOR facility between south of East 38th Street and East of Scatter field Avenue. U.S. EPA OSC's and the OSC contractor continued inspections of debris removal and met with Mr. Cory Smith on Friday after the lunch break to reinspect some areas and indicate that complete removal of

debris was necessary. Late Friday afternoon, OSC Mr. Ken Rhame, had meetings with the Indiana Department of Environmental Management (IDEM) with respect to Residential Consent Agreements and to determine procedures for continued oversight. No debris removal was conducted over the weekend.

From 18 April through 22 April 2005, the OSC contractor assisted the U.S. EPA OSC's with providing full oversight of debris removal operations as conducted by AMACOR and three separate Debris Removal Teams. The OSC contractor made real-time inspections of targeted areas to ensure removal procedures were being followed and were effective. Debris removal activities continued on 25 April, 2005 with U.S. EPA OSC, Bill Simes providing oversight.

From 14 June through 22 June, 2005, HydroTech mobilized to the project site area to continue debris removal for the remaining approximately 600 residences and other properties. Approval for access to these properties was given by Court Order for HydroTech to be allowed access for purposes of continued debris removal. Residential parcels and other properties, such as the abandoned Nicholson File Company site were inspected and debris removal was accomplished utilizing the same techniques as previously implemented for this project. The Debris Removal Team was coordinated and directed by HydroTech as provided in the Court Order to proceed. The debris removal areas included those remaining properties located between Scatterfield Road east to Columbus Avenue west and south from 53rd Street to 32nd Street. HydroTech utilized previously generated address lists to determine locations of properties not included during the previous clean-up.

On 20 June, 2005, U.S. EPA Weston START Contractor, Matthew C. Stokes, observed the final stages of the debris removal and clean-up activities for the remaining properties from Scatterfield Road to Columbus Avenue, between 53rd Street and 32nd Street. HydroTech used a comprehensive approach for address verification to ensure all properties were inspected with debris clean-up accomplished within these physical boundaries. One Debris Removal Team was utilized to conduct these clean-up efforts. Areas were inspected and to complete debris removal from horizontal surfaces, including roofs, gutters, landscaped areas, fence lines and yards. Upon visual inspection by the EPA Contractor, impacted areas were properly inspected and cleaned to accomplish the successful removal of remaining debris. CSE activities were not considered necessary by HydroTech for these remaining areas since previous sampling and air monitoring activities did not reveal the presence of asbestos.

Upon the Termination of Debris Collection and following confirmation of the removal of all visible debris in residential areas, HydroTech conducted Clearance Sampling Event (CSE) performed by Project Monitors, as specified in the SOW. Areas with residential yards of heavy concentration were chosen to conduct this sampling event. A gasoline powered mower was used to go over cleaned yards to verify complete removal of debris. The mower was operated by a Class I Licensed Asbestos Worker, utilizing personal monitoring pumps for air sampling. In addition, area monitoring was conducted with five (5) stationary monitoring pumps to ensure full compliance. Full details for the CSE are found the HydroTech SOW.

On 6 May, 2005, HydroTech mobilized a crew to 4 residences on the east side of Wells Street south of 36th Street to initiate the CSE. The second crew was mobilized to the east side of Clark Street, south of 45th Street. As part of each monitoring event, 5 perimeter sampling pumps were located at each yard during the CSE with 3 sample pumps downwind and 2 sample pumps on the upwind side of the lengthwise portions of the yards. These sample points were moved to the next yard as each was completed. As well, 2 personal air sampling monitors were positioned on the technician conducting the mowing activities. Each of the CSE areas were mowed for a total of 8 hours with continuous sampling conducted.

On 6 May, 2005, U.S. EPA Weston START Contractor, Matthew C. Stokes, was on-site to observe CSE activities and conduct oversight of clean-up verification monitoring at each of the locations on Wells Street and Clark Street. Based on sight inspections and discussions with HydroTech personnel, the CSE was implemented according to the Statement of Work with all sampling points operational during the CSE.

Planned Removal Actions
NONE

Next Steps
NONE

Key Issues
Access agreements–Over the course of several weeks, from 3/28/05 through 4/14/05, AMACOR obtained over 600 signed property access agreements from the residents of affected areas south of the

AMACOR facility. Concerning follow-up debris removal at remaining properties, HydroTech conducted final debris clean-up activities from 6/14/05 through 6/22/05 per a court order to enter and clean debris at the remaining locations within the affected area.

Disposition of Wastes

Contaminant: Asbestos
Bag Collection Method
using opaque 6-mil plastic bags, sealed with duct-tape and double bagged for disposal.

Disposal Facility: Waste Management, Inc.
Jay County Landfill
5825 West 400 South
Portland, Indiana 47371

Transporter: Waste Management, Inc.,
utilizing double-lined roll-offs containers for transport of waste debris.

Volume:
Several Roll-Off Containers

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