EPA

On this day, September 12, 2007,

the U.S. Environmental Protection Agency (U.S. EPA)

Determines that

Ingram-Richardson Superfund Site Is Ready for Commercial/Industrial Reuse

Richard C Karl

Richard C. Karl
U.S. EPA Region 5
Superfund Division
Director

This Ready for Reuse (RfR) Determination is for the 17-acre Ingram Richardson Superfund Site ("Site") located in the Town of Frankfort, Clinton County, Indiana. This RfR Determination provides that U.S. EPA has made a technical determination that the Site is ready for commercial/industrial use and the Site's remedy will remain protective of human health and the environment. This RfR Determination is based upon the findings in the Site's Action Memoranda, Pollution Reports (POLLREPS), the On-Scene Coordinators Report, and is summarized in the attached report, Ingram-Richardson Site Ready for Reuse Determination , September 12, 2007. This RfR Determination remains valid unless new information becomes available to suggest that conditions at the Site are no longer protective for commercial/industrial use.

U.S. EPA's Final Pollution Report confirms the successful removal of all identified wastes at the Site. The types of uses identified as protective in this RfR Determination remain subject to (i) applicable federal, state, and local regulation, including, but not limited to zoning ordinances and building codes, and to (ii) title documents, including, but not limited to, easements, restrictions, and institutional controls.

This Ready for Reuse Determination is an environmental status report and does not have any legally binding effect, nor does it expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits of any party. Thus, nothing in this RfR Determination affects the 1998 Agreement and Covenant Not to Sue entered into between U.S. EPA and the Board of Commissioners of Clinton County ("Board"), Frankfort Market Place, Inc., and Kelly Strange, whereby the Board agreed to redevelop the Site as a juvenile treatment center, for other related correctional programs, or for other municipal services to service the needs of the citizens of Clinton County. U.S. EPA assumes no responsibility for reuse activities and/or any potential harm that might result from reuse activities. U.S. EPA retains any and all rights and authorities it has, including but not limited to legal, equitable, or administrative rights. U.S. EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee, and/or require environmental response actions in connection with the Site, including but not limited to instances when new or additional information has been discovered regarding the contamination or conditions at the Site that indicate that the response and/or the conditions at the Site are no longer protective of human health or the environment for the uses identified in the Ready for Reuse Determination.

INGRAM-RICHARDSON SITE
READY FOR REUSE DETERMINATION

TABLE OF CONTENTS

I. Executive Summary 1

II. Site Location 3

III. Site Summary 4
- Site and Contaminant History 4
- Description of Risks 5
- Summary of Cleanup Activities 5
  - First Removal Action (5/23/1990–7/6/1990) 6
  - Second Removal Action (10/26/1992–9/29/1994) 6
- Redevelopment/Reuse History 8

IV. U.S. EPA's Basis for the Ready for Reuse (RfR) Determination 8

V. Post Removal Closure Activities 9

VI. Provisos 9

APPENDIX A: June 1990 Pollution Report A-1

APPENDIX B: 1994 Final Pollution Report B-1

APPENDIX C: ABBREVIATIONS AND ACRONYMS C-1

LIST OF EXHIBITS

Exhibit 1 Ingram-Richardson Site Map 3
Exhibit 2 Ingram-Richardson Site Map, showing surrounding area 4
Exhibit 3 Timeline of Activities Performed at the Ingram-Richardson Site 5

I. Executive Summary

This Ready for Reuse (RfR) Determination is for the Ingram-Richardson Site (the Site) located in Frankfort, Clinton County, Indiana. The Ingram-Richardson Site is 17 acres, located on State Road 28 west of the city limits of Frankfort. The Site is bordered by a railroad spur to the north, State Road 28 to the south, Prairie Avenue to the east, and residences on the west. The Site is currently owned by the Board of Commissioners of Clinton County.

The conditions summarized in this RfR Determination are based on U.S. EPA documents for the Ingram-Richardson Site, including Action Memoranda, Pollution Reports (POLREPS), *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities*, and the On-Scene Coordinators Report. U.S. EPA has made a technical determination that the Site, located in Frankfort, Clinton County, Indiana is ready for commercial/industrial use. The likely future land use for the Ingram-Richardson Site is industrial/commercial, based on current zoning, and reasonably anticipated future zoning. At the time of the Action Memorandum for the Site, the Site was zoned for industrial use.

Beginning in 1915, the Ingram-Richardson facility was involved in the production of porcelain enamel frit for steel, cast iron, and other porcelain products. During the plant's operation, waste was disposed of on-site. The viscous frit waste from settling and clarifying tanks was pumped into a vacuum tanker and disposed of in a holding lagoon located on site. For more information, refer to the pollution reports in Appendices A and B.

The risks that were identified for the Ingram-Richardson Site were exposure to PCBs, lead, and asbestos present in the asphalt, soils, building materials, and storage containers by direct contact, inhalation, and ingestion. In its Action Memorandum for the Site, U.S. EPA selected response actions to manage these risks to human health and the environment. With the completion of removal activities at the Ingram-Richardson Site in September 1994, U.S. EPA has attained cleanup levels consistent with commercial/industrial use of the property. This determination is based on the *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities*, which recommends screening level for lead in soil for residential land use to be 400 parts per million (ppm).[1] The soil cleanup level for lead at the Ingram Richardson Site was 500 ppm, which exceeds screening level for residential, but is appropriate for commercial/industrial use that would result in less exposure than a residential scenario. As a result, based on information available as of this date, U.S. EPA has determined that the unacceptable levels of risk to current and future users of the Ingram-Richardson Site have been abated and the Site may be used for commercial/industrial purposes and will remain protective of human health and the environment. The Site is ready for commercial/industrial use, but remains subject to local zoning.

[1] EPA OSWER Directive #9355.4-12, August 1994. Memorandum: OSWER Directive: *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities.* U.S. Environmental Protection Agency. Washington, DC 20460.

U.S. EPA Region 5 issued this Ready for Reuse Determination, effective September 12, 2007.

By:

_____

Richard C. Karl
Superfund Division
United States Environmental Protection Agency
Region 5

Documents pertaining to the Site and the RfR determination are part of the Administrative Record for the Site, which is available for review at U.S. EPA Region 5 offices in Chicago, IL. Additional information can be obtained at the Frankfort Community Public Library, 208 W. Clinton Street, Frankfort, IN 46041. The library is open Monday–Thursday 9am to 8pm; Friday–Saturday 9am to 5pm; and Sunday 1pm to 5pm. For more information about the site, contact the On-Scene Coordinator for the Site, William Simes at simes.william@epa.gov.

The attached RfR Determination is a technical document and an environmental status report that does not have any legally binding effect, nor does it expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits of any party. Thus, nothing in this RfR Determination affects the 1998 Agreement and Covenant Not to Sue entered into between U.S. EPA and the Board of Commissioners of Clinton County ("Board"), Frankfort Market Place, Inc., and Kelly Strange, whereby the Board agreed to redevelop the Site as a juvenile treatment center, for other related correctional programs, or for other municipal services to service the citizens of Clinton County. U.S. EPA assumes no responsibility for reuse activities or for any possible or potential harm that might result from reuse activities. U.S. EPA retains any and all rights and authorities it has, including but not limited to legal, equitable, or administrative rights. U.S. EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee, and/or require environmental response actions in connection with the Ingram Richardson Site, including instances when new or additional information has been discovered regarding the contamination or conditions at the Site that indicate that the remedy and/or the conditions at the Site are no longer protective of human health or the environment for the uses identified in the RfR Determination.

II. Site Location

The Ingram-Richardson Site encompasses an area of approximately 17 acres in Frankfort, Clinton County, Indiana. The Site is an inactive production facility located on State Road 28 west of the city limits of Frankfort. The Site is bordered by a railroad spur to the north, State Road 28 to the south, Prairie Avenue and an auto dealership to the east, and Blinn Street and residences on the west. The Site includes tax parcel 0011911701. The Site is currently owned by the Board of Commissioners of Clinton County. Exhibit 1 shows the approximate boundary of the Site; Exhibit 2 shows the immediate vicinity of the Ingram-Richardson Site.

The site is a relatively flat, industrially zoned property. Approximately 5,500 people reside within one mile of the site.

Exhibit 1. Ingram-Richardson Site Map

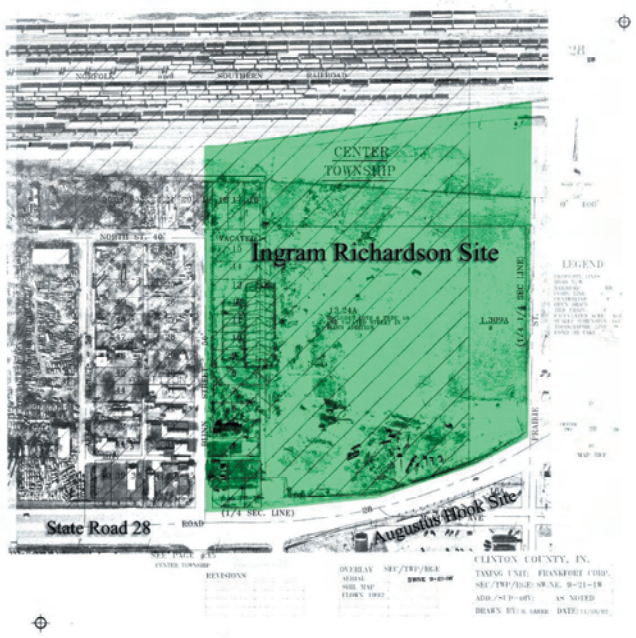
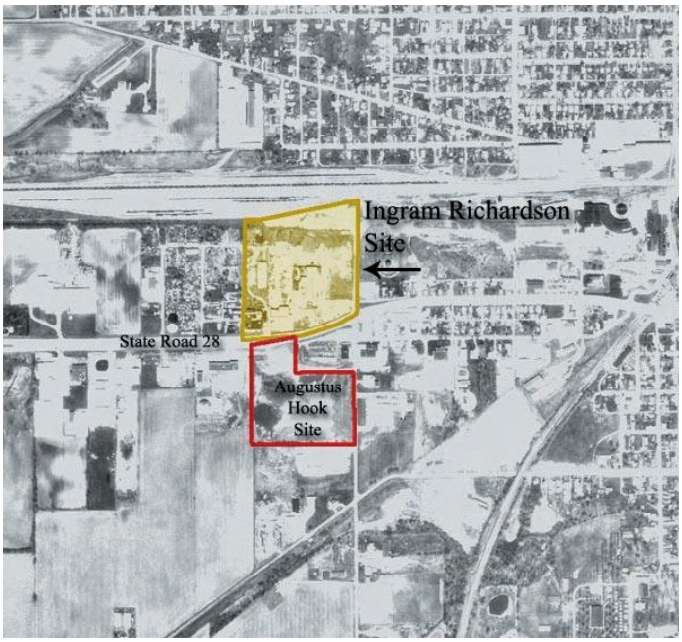


Exhibit 2 Ingram-Richardson Site Map, showing surrounding area



III. Site Summary

Site and Contaminant History

The Ingram-Richardson Site was engaged in the production of porcelain enamel frit for steel, cast iron, and other porcelain products. The Site began operating in 1915 as Ingram-Richardson Inc. and ceased operations in 1981 after the company declared bankruptcy. During the plant's operation, waste was disposed of on site. The viscous frit waste from settling and clarifying tanks were pumped into a vacuum tanker and disposed of in a holding lagoon located on site. Frit is a grainy, ground glass material. When fired at high temperatures, it is converted into porcelain glaze. Different metals or combinations of metals are used to produce colors or hues in the final product. Some of the metals used in frit are potentially toxic and include lead, nickel, cobalt, and chromium.

Prior to the early 1950s, bottoms from the tanks, other frit wastes, and caustic wastes from porcelain removed from defective parts were placed at a location on the plant site in what became known as the "mountain." The mountain was located on the central eastern side of the Ingram-Richardson property. Any other wastes such as broken porcelain, clay, ashes, metal, and debris were also put on the mountain. In the early 1950s, the material forming the mountain was removed and transported across State Road 28 to what is now 815 Realty Inc. (formerly Augustus and Hook Associates) property, a vacant lot.

Additional contamination of the Ingram-Richardson Site resulted from leakage of PCB-contaminated oil from a disconnected transformer, disposal of wastes generated from the

production of porcelain enamel, and the use of asbestos-containing materials in the buildings on site. As a result of these activities, asphalt, soils, building materials, and storage containers were contaminated with PCBs, lead, and asbestos. At the time of cleanup, nine buildings were situated on site: three warehouses, two small offices, one wastewater treatment building, three manufacturing plants, and a small pump house with an underground storage tank.

Description of Risks

Based on investigations conducted after the PCB-contaminated oil leak at the Ingram-Richardson Site, U.S. EPA determined that conditions at the Site posed a direct threat to human health and the environment, and warranted a removal action. The risks that were identified for the Site included:

- Elevated levels of PCBs located in on-site buildings and containers and in soils;
- High levels of lead in dust and soils and asbestos containing materials; and
- High levels of lead in surface and sub-surface soils that could pose risks to future workers or surrounding residents.

Summary of Cleanup Activities

Exhibit 2 shows a timeline of U.S. EPA activities performed to date at the Ingram-Richardson Site. U.S. EPA conducted two removal actions at the Site. The first dealt with PCBs in a leaking transformer; the second dealt with lead, and asbestos in the asphalt, soils, building materials, and storage containers.

Exhibit 3. Timeline of Activities Performed at the Ingram-Richardson Site

Date	Activity
1915	Site begins operating as Ingram-Richardson Inc. and engages in the production of porcelain enamel frit for steel, cast iron, and other porcelain products.
1981	Site stops operations after the company declares bankruptcy.
August 7, 1985	Site property is purchased by Frankfort Market Place Corporation.
May 18, 1990	U.S. EPA's Technical Assistance Team (TAT) conducts a site assessment and documents the presence of PCBs.
May 24, 1990	U.S. EPA initiates removal action to remove threat of PCBs.
July 6, 1990	All on-site PCB removal activities are completed.
August 1991, February and May 1992	IDEM, U.S. EPA, and the TAT conduct site investigations and discover lead and asbestos contamination.

Date	Activity
October 26, 1992	U.S. EPA initiates a time-critical removal action to remove the threat of lead and asbestos.
May 1993–June 1994	Sampling events are conducted on both on-site and off-site properties, and show lead contamination above cleanup levels in an area adjacent to the Site (Augustus Hook site).
September 29, 1994	All on-site lead and asbestos removal activities are completed.

First Removal Action (5/23/1990–7/6/1990)

On May 14, 1990, in response to a complaint of an obnoxious odor originating from the Site, the Frankfort Fire Department (FFD) arrived at the site and observed a disconnected transformer leaking suspected PCB-contaminated oil. Removal activities began immediately, and included: emptying the oil remaining in the transformer into 55-gallon poly drums, moving the transformer to an on-site building (Plant #2), and excavating the asphalt and soil from the area where the spill had occurred. The excavated material was stored inside the existing plant site near the transformer.

Based on IDEM observations of the removal, U.S. EPA was contacted on May 18, 1990 to conduct a site assessment at the Ingram-Richardson Site. The site assessment documented the presence of PCBs, both in the contaminated materials stored in the plant and on the asphalt directly south of the plant. A removal action was initiated on May 24, 1990 by U.S. EPA. The cleanup actions that were completed included:

- An area 150 feet by 20 feet area which included the spill path of the oil was excavated to a depth of three-quarters feet.
- The transformer, drums, and excavated material were removed from Plant 2.
- The floor in Plant 2 was decontaminated with an alkaline detergent, water, and a floor cleaner. The rinsate was collected with a vacuum and drummed for disposal. The asphalt outside of plants 1, 2, and 3 was decontaminated in a similar manner.
- PCB-contaminated materials and debris were transported and disposed of offsite.

All on-site PCB removal activities to remove PCBs from the Site were completed July 6, 1990.

Second Removal Action (10/26/1992–9/29/1994)

In August 1991 and February 1992, IDEM conducted a site investigation at the Ingram-Richardson Site. Soil samples collected were found to have high concentrations of lead. At the request of IDEM, a site assessment was conducted on May 7, 1992. In addition, Plant 1 contained six upright tanks possibly containing acetylene. Plant 2 contained empty vats and other materials that had been used in plating operations. Plant 3 contained debris and one empty

100-gallon tank. On the east side of Plant 3 were empty plating vats and four white fiber drums with labels reading "caustic." Holes in one of the fiber drums showed the contents to be a yellowish-white powder. Plastic garbage bags filled with chunks of a white material, believed to be asbestos, were observed at various locations on the north side of the Site. Also on the north side of the Site was a pile of broken corrugated building material which was believed to be transite board (an asbestos-containing material). On the west side of the Site was a warehouse which was suspected to be constructed out of transite.

Soil sample results from the east side of the Site revealed the presence of lead levels as high as 880 mg/L. Asbestos samples taken from the east area of the Site revealed concentrations as great as 15.56% asbestos. U.S. EPA issued three Action Memoranda to complete the cleanup of the Site.

On September 23, 1992, an Action Memorandum was signed to address the lead and asbestos contamination at the Site. The proposed response action included: sampling and disposal of fiber drums and asbestos, excavation of contaminated soil, fixation of lead-contaminated soil, and disposal of treated soil in a local landfill. The time-critical removal action was initiated on October 26, 1992 by U.S. EPA. The cleanup actions that were completed included:

- Removal and disposal of the transite roof from the smelter building.
- Abating of the friable asbestos from the furnace oven.
- Disposal of loose transite shingles lying around the Site.
- Removal of insulated pipes throughout the buildings that contained asbestos.
- Removal of asbestos-containing material from a boiler in Plant 2, a conveyor behind Plant 1, and an incinerator in Plant 1.
- Removal of the roofing over the northern half of Plant 2 that was constructed of transite.
- Excavation of approximately 18,250 tons of onsite lead-contaminated soil, which was weighed and stockpiled for treatment.

An off-site extent of contamination study was performed by U.S. EPA and revealed that contamination had migrated off site. Another 1,500 tons of soil was estimated to remain off-site, which required access by the property owners before it could be excavated.

The second Action Memorandum dated March 16, 1993, resulted in the following cleanup activities:

- Excavation of 3,500 tons of lead-contaminated soil from off-site.
- Treatment of lead-contaminated soil by chemical fixation, which involved mixing the contaminated soil with a predetermined amount of cement and calcium carbonate. An estimated total of 28,000 tons of soil resulted from treatment.
- Transportation and disposal of approximately 4,800 tons of fixated soil.

The final Action Memorandum, dated May 26, 1994, allowed the completion of cleanup activities for the Site, including:

- Removal of the final 23,200 tons of stabilized lead-contaminated soil, which was transported and disposed of in an approved landfill.
- Removal of any remaining visible soil left in the staging areas, which was scraped and swept up, and transported to an approved landfill for disposal.
- Transite removal from the entire warehouse as well as the roof of the garage building was also completed. A total of 151 cubic yards of transite shingles were shipped to an approved landfill for disposal.

On September 29, 1994, all on-site lead and asbestos removal activities were completed. Cleanup level for lead was 500 parts per million (ppm).

Redevelopment/Reuse History

The Ingram-Richardson Site is currently vacant; all structures have been removed from the Site. The Site is zoned for industrial use. According to the September 1992 Action Memorandum, IDEM intended to turn over the property to the city of Frankfort for redevelopment after completion of the removal action. The surrounding region has sustained significant economic growth. Commercial and industrial growth in Clinton County has increased in recent years. This economic growth in Clinton County has had a positive impact on downtown Frankfurt.

IV. U.S. EPA's Basis for the Ready for Reuse (RfR) Determination

The reasonably anticipated future land use for the Ingram-Richardson Site is industrial/commercial based on current zoning and reasonably anticipated future zoning. The RfR Determination for the Ingram-Richardson Site determines that the Site is ready for commercial/industrial use. This determination is based on the *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities*, which recommends screening level for lead in soil for residential land use to be 400 parts per million (ppm). The soil cleanup level for lead at the Ingram Richardson Site was 500 ppm, which exceeds screening level for residential, but is appropriate for commercial/industrial use that would result in less exposure than a residential scenario.

The RfR Determination for the Ingram-Richardson Site is based upon the Action Memoranda, Pollution Reports (POLREPS), *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities*, and the On-Scene Coordinator Report for the Site. Prior to the cleanup, the Ingram-Richardson Site posed unacceptable risks to human health and the environment. According to the June 1990 POLREP (available in Appendix A), the first removal action removed all PCB contamination from the Site and was verified with samples. The 1994 final Pollution Report, which is available in Appendix B, documents that all asbestos-containing materials and lead-contaminated soils were disposed of in an approved landfill. Soil cleanup action level for lead was 500 ppm, and is protective of commercial/industrial use.

V. Post Removal Closure Activities

At the Ingram-Richardson Site, post-removal control was not necessary following the removal actions. All surface soils containing PCBs, lead, and all asbestos present in asphalt, soils, building materials, and storage containers were removed. The Indiana Department of Management (IDEM) conducted follow up groundwater monitoring after EPA's removal action. Groundwater beneath the Site was not found to be negatively impacted.

VI. Provisos

This RfR Determination is a technical decision document and does not have any legally binding effect and does not expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits of any party. Thus, nothing in this RfR Determination effects the 1998 Agreement and Covenant Not to Sue entered into between U.S. EPA and the Board of Commissioners of Clinton County ("Board"), Frankfort Market Place Inc., and Kelly Strange, whereby the Board agreed to redevelop the Site as a juvenile treatment center, for other related correctional programs, or for municipal services to service the needs of the citizens of Clinton County. U.S. EPA assumes no responsibility for reuse activities and/or for any potential harm that might result from reuse activities. U.S. EPA retains any and all rights and authorities it has, including, but not limited to legal, equitable, or administrative rights. U.S. EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee, and/or require environmental response actions in connection with the Ingram-Richardson Site, including but not limited to instances when new or additional information has been discovered regarding the contamination or conditions at the Site that indicate that the response and/or the conditions at the Site are no longer protective of human health or the environment for the types of uses identified in the Ready for Reuse Determination.

The types of uses identified as protective in this RfR Determination remain subject to (i) applicable federal, state, and local regulation and to (ii) title documents, including, but not limited to, easements, restrictions, and institutional controls.

APPENDIX A

June 1990 Pollution Report

FILED

DATE: JUN 0 8 1990

POLREP NUMBER: 1

REMOVAL ACTION: Ingram-Richardson, Frankfort, Indiana

OSC: Brad Benning, Region V

SITUATION

A. An out-of-service transformer at the above facility released approximately 15 gallons of PCB oil (Pyranol) containing 670,000ppm of Aroclor 1260. (5/14/90)

B. Initial response by the PRP ceased due to funding limitations.

C. The released oil was spread over a parking area by a trucking company, and also inside one building as a result of the initial cleanup attempt.

ACTIONS TAKEN:

A. On May 22,1990, TAT conducted an extent of contamination study, 24 samples were collected.

B. On May 24, 1990, the ERCS contractor (OHM Inc.) was mobilized to the site to initiate removal actions under a verbal authorization of $25,000. PRP was notified of the pending action, but was unable to fund the cleanup.

C. Removal actiion continued on 5-25 and 5-30 thru 6-1. Verbal authorization for an additional $25,000 raised the project ceiling to $50,000. Scope of work included the following:

1. Excavation of oil soaked asphalt.
2. Contaminated areas washed with an alkaline solution, rinsed, and vacuumed.
3. Wipe sampling to verify cleanup operation.

D. On June 1, 1990, the following items were transported to Ensco Inc. for disposal.

1. Drained 500kva transformer.
2. (6) Pyranol capacitors.
3. (4) containers of Pyranol oil.
4. (4) containers of contaminated washwater.

FUTURE PLANS:

A. Encapsulation of the residual PCB by seal coating the asphalt

parking lot.

B. Meeting with the Regional enforcement attorney on 6/15/90.

C. Arrange disposal for the remaining waste, (3) containers and (5) roll-off boxes.

<u>COST TO DATE</u> (as of 6/1/90)

APPENDIX B

1994 Final Pollution Report

U.S. ENVIRONMENTAL PROTECTION AGENCY
FINAL POLLUTION REPORT

I. Heading

Date: September 30, 1994
From: William Simes, OSC, U.S. EPA, Region V, EERB
To: R. Karl, EERB, (EPA 9538)
J. Cisneros, ESS, (EPA 9538)
F. Rollins, Chief, R-S III
D. Attermeyer, ORC
D. O'Riordan, OPA, (EPA 9538)
T. Johnson, (EPA 5511)
C. Schroer, IDEM Site Coordinator
H. Woodruff, Mayor of Frankfort, Indiana
D. Archer, Clinton Co. Dept. of Health
N. Sterling, Chief, Frankfort Fire Dept.
U.S. Coast Guard, District 2
U.S. Fish & Wildlife Service, Indiana

cc: Don Henne, U.S. Department of the Interior
Custom House, Room 217
200 Chestnut, Philadelphia, PA 19106-2904

Subject: Ingram-Richardson Site,
Frankfort, Clinton County, Indiana
Longitude: 86°31'53.3" Latitude: 40°16'44.3"

POLREP: POLREP 37 - Final

II. Background

Site #: JF
Delivery Order #: 5001-05-304
Response Authority: CERCLA
NPL Status: None
Start Date: October 26, 1992

III. Response Information

A. Situation

The Ingram-Richardson site is located on West State Rd 28 in Frankfort, Clinton County, Indiana. The site is a 17-acre inactive production facility which was engaged in the production of porcelain enamel frit for steel, cast iron, and other porcelain products. The

site is owned by Frankfort Market Place, Inc. The site is a relatively flat, industrially zoned area. The site is bordered by a railroad spur to the north, State Road 28 to the south, Prairie Avenue on the east, and residences on the west. Approximately 5,500 people reside within one mile of the site.

The site began operating in 1915 as Ingram-Richardson, Inc. and ceased operations in 1981 after the company declared bankruptcy. During the plant's operation, waste was disposed of on-site.

Last on-site activity was May 18, 1993 when stabilization of all on-site contaminated soil was completed and shipment of approximately 18 % of the treated special waste soil was sent to Waste Management's Danville Landfill. Work ceased at this time due to monetary constraints. On 5/26/94, an Action Memorandum was signed by the U.S. EPA Regional Administrator increasing the project ceiling to 2.7 million dollars and authorizing a one year exemption.

Between 5/93 and 6/94 three sampling events of the extent of contamination study were conducted on both on-site and off-site properties. The extent of contamination studies showed that an area adjacent to the west of the site approximately 80 feet by 50 feet was contaminated with lead above the clean-up level of 500 ppm as established by ATSDR. All other areas sampled in the studies showed levels below the clean-up level.

B. Actions Taken

During w/e 7/30/94, SSI completed all transite removal. A total of 151 cubic yards of transite shingles were shipped to Caldwell Landfill, Morristown, Indiana, for disposal by SSI. The SSI crew removed transite shingles from the entire warehouse as well as the roof of the garage building.

On August 2, 1994, the TAT and OSC returned to site to perform confirmation sampling of the areas where the treated soil had been staged. A total of nine samples were collected within the three areas. On August 8, 1994, analytical results from the nine samples were received. Analytical results for all nine samples indicated the presence of total lead above the cleanup action level of 500 ppm.

On September 28 and 29, 1994, the OSC, TAT, and ERCS returned to the site. The ERCS crew consisted of two laborers, one operator, and one junior response

manager. The ERCS crew scraped and swept up any remaining visible soil left in the staging areas. The soil was then loaded into a roll-off box and shipped to Waste Management's Twin Bridges Landfill as a special waste for disposal. On September 29, 1994, the OSC, TAT, and ERCS demobilized to site.

C. Waste Disposal Table

Waste	Quantity	Method of Disposal
Stabilized Lead-Contaminated Soil	27,180 Tons	Landfill
Asbestos	523 Yd^3	Landfill

IV. Cost Information

APPENDIX C

ABBREVIATIONS AND ACRONYMS

AH - Augustus Hook
AR - Administrative Record
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund)
COC - Contaminant of Concern
IR - Ingram Richardson
NPL - (N)ational (P)riorities (L)ist of Superfund Hazardous Waste Sites
NTC - Non-time critical removal action
O&M - Operations and Maintenance
OSWER - Office of Solid Waste and Emergency Response
PA - Preliminary Assessment
POLREP - Pollution report
PRP - Potentially Responsible Party
RCRA - Resource Conservation and Recovery Act
RfR Determination - Ready for Reuse Determination
RI/FS - Remedial Investigation/Feasibility Study
RPM - Remedial Project Manager
SI - Site Inspection
TC - Time critical removal action
U.S. EPA - United States Environmental Protection Agency