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APR 8 1980

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Mr. Lee Ellenberger
Manager of Operations
Adams Center Sanitary Landfill
P.O. Box 6116
Fort Wayne, IN 56896

Dear Mr. Ellenberger:

Re: Disposal of Oil Contaminated Dirt from
ITT Aerospace of Fort Wayne, Indiana

This letter acknowledges the request for disposal dated November 18, 1979, from Mr. G. D. Stein of ITT Aerospace of Fort Wayne, Indiana.

Approval is hereby granted for disposal of six cubic yards of oil contaminated soil from ITT Aerospace, on a one-time-only basis, at the Adams Center Sanitary Landfill, OPP 2-1, Allen County. The waste is to be disposed of in the separate disposal area of the landfill and covered with a minimum of one foot of cover soil by the end of the working day.

This approval will be revoked if the landfill fails to maintain compliance with 330 IAC 4-1, et. seq., (Regulation SPC 18). Any necessary local approval must be obtained from the Fort Wayne-Allen County Health Department.

If you have any questions, please contact Mr. Tim Kelley of the Solid Waste Management Section at AC 317/633-0178.

Very truly yours,

Oral H. Hert
Technical Secretary

TMKelley/cgp
cc: Fort Wayne-Allen County Health Department
Mr. G. D. Stein
Mr. Larry Reynolds
Pollution Control Systems
Enforcement Branch
Division of Water Pollution Control
RM SE-7-F 3/31 F

HAZARDOUS WASTE WORK SHEET

GENERATOR

ITT Aerospace/Optical Division

ADDRESS

3700 E. Portia Street

Fort Wayne, Indiana

46803

TELEPHONE

219-423-9636

PERSON(S) CONTACTED

G.D. Starn - Pres. Chairman

Larry Reynolds 219-637-3137

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e., percent solids)

12-14-79 Received letter from Division of Water Pollution Control. Regarding the clean-up of the Harvester Ditch. Pipe.

I have been in contact with Larry Reynolds of Pollution Control Systems, the contractor clean-up firm. He has been instructed as to the type of data and analysis that needs to be performed.

1-21-80 Received analysis. - The waste is characterized as: PH 8.2 CN 0.98 mg/kg PCB < 0.2 mg/kg Toluene < 0.007 MEK < 0.85 mg/kg Xylene < 0.01 mg/kg Cd 0.4 mg/kg Pb 3.6 mg/kg Cr 0.24 mg/kg Hg < 0.02 mg/kg As < 0.02 mg/kg

3-20-80. Rough draft of approval letter sent to the word center for 6 cubic yards of material to go into the appropriate area of the Adams Center Sanitary landfill, CP No 2-1, Allen Co. on a one-time-only basis.



— what will be disposed of if silt goes back to ditch?
 — only water should be retained!
 called Mr. Joffe & this is true

DEC 3 11 42 AM '79

INDIANA STATE BOARD OF HEALTH
 DIVISION OF WATER POLLUTION CONTROL

Telecommunications and Electronics Group - North America

International Telephone and Telegraph Corporation

JHS
 any comments?
 fwd. to DeLamm

DEC 11 9 00 AM '79
 Aerospace/Optical Division

SANITARY ENGINEERING DIVISION
 STATE BOARD OF HEALTH
 3700 E. Pontiac Street
 Fort Wayne, IN 46803
 (219) 423-9636

IA

November 28, 1979

Mr. Joseph C. Stallsmith, Chief
 Enforcement & Operations Branch
 Division of Water Pollution Control
 1330 West Michigan
 Indianapolis, Indiana 46206

Subject: Deposit of Sand/Oil in Harvester Ditch
 Beneath ITT A/OD Property

Gentlemen:

On several occasions within the past few months, the desirability of removing the subject deposit has been discussed with your office, along with representatives from the County, City, and East End Industries group. As you know, our plant and International Harvester Company are the only industries upstream of the deposit; however, the original source and cause, as well as the length of time it has existed, cannot be determined. Although it may not be a hazard at this time, we feel its continued existence represents a potential hazard to the downstream environment.

We have, therefore, elected to initiate the necessary action for removal of the deposit, since it must be done from our property, and will request International Harvester Company to cost share in the project (estimated at \$4,000). Pollution Control Systems, Inc., of LaOtto, Indiana, has been retained to accomplish the removal and present plans are to do the work in the early morning on December 5, 1979.

A brief summary of the project is described in Attachment "A" hereto, and we would welcome any comments from your office. Likewise, by copy of this letter and the attachment, Messrs. Becker's and Camperman's comments are solicited.

Sincerely,

G. D. Stein
 Environmental Chairman
 ITT AEROSPACE/OPTICAL DIVISION

Attachment

cc: Fort Wayne Pollution Control/Mr. Becker
 Allen County Pollution Control/Mr. Camperman

ATTACHMENT "A"
SUMMARY OF DEPOSIT REMOVAL PROJECT

1. Contractor

The firm selected to perform the project is:
Pollution Control Systems, Incorporated
County Road 5505, Box 17
LaOtto, Indiana 46763

2. Problem Definition

An area of oil-bearing sand and silt exists in the Harvester Ditch Tile beneath ITT property. It is desired that this material be removed for disposal. The material now exists in a section of the 90-inch diameter concrete pipe to the west of the ITT buildings and just south of Pontiac Street. The material lies approximately 25 feet southeast of an accessible manhole, which is located in a paved area. The depth of the material is approximately 12 inches at mid-pipe and the length of the deposit is thirty feet more or less. It is estimated that approximately 5.2 cubic yards of solid material will be removed.

3. Recovery Method

The combination of vertical lift, horizontal traverse, and material density combine to preclude the use of conventional pumping techniques. It has been determined that a tandem-diaphragm pump operated in the pipe would most effectively transport the material to ground level. A gravity separator would be used to remove the sand. Water and silt will be returned to the sewer. The majority of any separated oil would be retained in the separator. Sorbent materials and/or other materials or equipment will be utilized at the outlet of the tile in order to remove or contain any material that is lost to the water flow in the tile during the recovery process. Preventing the loss to receiving waters of the material being recovered will be of primary importance.

*water and
suspended silt
only!* →

4. Disposal of Recovered Materials

Prior or subsequent to the recovery of the material in question, analyses may be required to determine the chemical constituents. The result of the analyses will be utilized to determine the method and location of final disposal.

The parameter requirements as specified by the Indiana State Board of Health are as follows:

Arsenic	Cadmium	Total Chromium
Lead	Mercury	Toluene
Xylene	Methyl Ethyl Ketone	PCB
pH	Standard Leachate Test	

ATTACHMENT "A"

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The results of the analyses will be presented to the State Board of Health for consideration of the disposal classification. Recovery and disposal of the material will be carried out according to the instructions of the Solid Waste Management Section of the Indiana State Board of Health.

Local disposal sites will be utilized if acceptable. Other sites will be chosen, if necessary, based on the classification of the recovered material and the acceptability of the site.

5. Special Considerations and Precautions

Personal safety precautions will be provided. All working personnel will be provided with safety line and harness. In addition, all working personnel will be provided with fresh air ventilated masks. One safety man with self-contained breathing apparatus will be standing by at all times. All working personnel will be radio equipped for communication with other workers at ground level. The potential for explosive pipe atmosphere exists. The use of an airpowered pump and normal precautions will be required.



POLLUTION CONTROL SYSTEMS INCORPORATED

COUNTY ROAD 550 S BOX 17 (AT STATE ROAD THREE)
LAOTTO, INDIANA 46763 TELEPHONE: (219) 637-3137

January 16, 1980

Mr. Guinn Doyle
Solid Waste Section
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206

Subject: Result of analyses performed on waste material removed from Harvester Ditch tile.

Dear Mr. Doyle:

During the week of December 2, 1979 approximately four cubic yards of oil bearing sand was removed from a section of Harvester Ditch tile beneath the property of ITT Aerospace/Optical Division located on Pontiac Street in Fort Wayne. The material is presently in containment on ITT property.

The material was an accumulation of sand, silt, and stones. A pocket of oily material of unknown origin and composition had accumulated in the area and therefore the Solid Waste Section was contacted regarding disposal requirements.

The following are the results of analyses performed on the material that was removed from the tile. The parameter list was specified by Mr. Tim Kelley of the Solid Waste Section.

The following results were obtained from analyses performed on the untreated sample.

<u>ANALYTICAL DETERMINATION</u>	<u>ANALYTICAL RESULT</u>
Xylene, mg/kg	Less than 0.01
Methyl Ethyl Ketone, mg/kg	Less than 0.05
Toluene, mg/kg	Less than 0.007
PCB, ug/kg	Less than 0.2
Cyanide, mg/kg	0.98
pH, Standard Units	8.2

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SANITARY ENGINEERING
DIVISION
STATE BOARD OF HEALTH

Kelley

Mr. Guinn Doyle
January 16, 1980; Page 2

The remaining analyses were performed on the leachate obtained by carrying the sample through the standard leachate procedure for extraction and detection of leachable constituents. The results are as follows:

<u>ANALYTICAL DETERMINATION</u>	<u>ANALYTICAL RESULT</u>
Cadmium, mg/kg	0.4
Lead, mg/kg	3.6
Chromium, mg/kg	0.24
Mercury, ug/kg	Less than 0.02
Arsenic, mg/kg	Less than 0.02

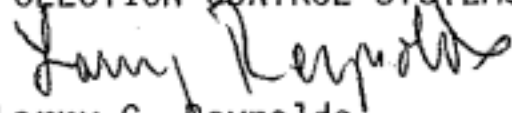
The analyses were performed according to the procedure and guidelines in Standard Methods for the Analysis of Water and Wastewater, 14th edition. U. S. Environmental Protection Agency analytical protocol was also employed where necessary. High sensitivity techniques were utilized for all analyses.

Please consider the above information and advise our office of an acceptable disposal site and method. Adams Center Sanitary Landfill in Allen County is the preferred disposal site if it is acceptable to your office.

Thank you in advance for your prompt attention to this matter.

Sincerely,

POLLUTION CONTROL SYSTEMS INCORPORATED


Larry G. Reynolds

LGR/jjh/mt29

CC: Mr. Jerry Spindler
ITT Aerospace/Optical Division
: Project File 79-3155