

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Sandusky Abrasives - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #5  
Progress  
Sandusky Abrasives  
C5XT  
Michigan City, IN  
Latitude: 41.7040350 Longitude: -86.9085540

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**From:** Allen Jarrell, OSC  
**Date:** 12/2/2024  
**Reporting Period:** 11/15/2024 - 11/22/2024

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5XT	<b>Contract Number:</b>	68HE0422D0005
<b>D.O. Number:</b>	24F0114	<b>Action Memo Date:</b>	9/5/2024
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	00
<b>Mobilization Date:</b>	10/21/2024	<b>Start Date:</b>	10/21/2024
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	INN000521907	<b>RCRIS ID:</b>	INR000008482
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

The Site is located at 1100 West Barker Avenue, Michigan City, LaPorte County, IN. The Site is comprised of eighteen (18) parcels totaling approximately 19.8 acres of land. The surrounding area is mixed use commercial and residential properties. The Site has been used most recently, as recent as February 2021, by Provision Byproducts for manufacturing spent products into vegetable oil/feed stock for animals and warehouse space and by Lyon LLC for manufacturing steel cabinets/shelving units until 2020. Another historical use was by Sandusky/Chicago Abrasive Wheel, from 1983 until 2010, which made abrasive metal wheels for various types of businesses. The original historical use of the Site, dating back to 1916 and going to 1972, was the Haskell and Barker Car Company/Pullman Standard Car Manufacturing Company as a railroad car manufacturing/maintenance facility including industrial activities/operations such as a railroad roundhouse/turtable, coal storage, an oil house, paint shops, sand blasting and fuel oil aboveground storage tanks (ASTs). The mixed-use residential, commercial, and industrial Site was first developed between 1899 and 1905.

##### 1.1.2.1 Location

The Site is located on the west side of West Barker Ave between Green and Garfield Streets.

### 1.1.2.2 Description of Threat

Sampling analysis by EPA determined that lead, a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14), and 40 CFR § 302.4, was released into the environment on the Site above the EPA commercial RML. Lead exists at high concentrations in the surface soil (0-2 feet bgs). This time-critical removal action addresses lead contaminated soil on-Site. The highest surficial (0-1 feet bgs) concentration of lead observed during removal assessment sampling was 6,946 ppm.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

At the request of Indiana Department of Environmental Management (IDEM), EPA was requested to consider the Sandusky Abrasives Site in Michigan City, Indiana for a removal action. EPA mobilized to the Site on June 16, 2023 to begin the removal action process by conducting a Site Assessment by selecting and identifying the boring locations for the soil samples. By the end of the day, 50 of the 75 boring locations were identified and marked with flags. On June 19, 2023, EPA began the geoprobe drilling and collection of soil samples. After arriving on Site, setting up the required equipment, and completing the identification and marking of the remaining 25 sample locations, soil sampling began at noon. EPA monitored air continuously with a DustTrak throughout the week of June 19, 2023 and the DustTrak was set in the vicinity of sample processing and drilling activities. Overall, EPA and START collected 425 samples from 1-foot intervals of 77 soil borings across the Site. EPA photographed the Site and documented the location of each sample taken in a logbook in accordance with the approved Sampling and Analysis Plan (SAP).

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

#### 2.1.2 Response Actions to Date

See POLREP 4 and earlier for previous response actions to date.

#### November 8, 2024 to November 15, 2024

Lead contaminated soil continued to be removed from Excavation Area 1, Area 2, and Area 3. After Area 1 was the proper depth (one foot bgs) and the side walls were cleared (Lead XRF readings below 800 ppm), clean road stone was filled into the area up to the original ground level. After Area 2 was the proper depth and side walls were cleared, clean soil and road stone was filled into the area up to the original ground level. The portions of Area 1 and 2 where gravel roads initially existed were filled with road stone. The removed lead contaminated soil was loaded into a dump truck and transported to the stockpile area on the east side of the building. In Area 3, contaminated soil continues to be removed to the proper one foot depth, side walls were cleared (except the south walls which still requires more contaminated soil to be removed, clean soil was filled into the cleared area sections up to the original ground level, and the asphalt road in this area remains. As of November 22, 2024, the amount of contaminated soil removed and stockpiled was re-calculated and estimated to be 900-1000 tons. The stockpiled soil was mixed with a reagent in order to render the soil nonhazardous with respect to Lead. On November 22, 2024, the 2 excavators, dump truck, water truck, and skid steer were demobed from the site for the week of Thanksgiving (thus saving \$16,500 in site expenses). The excavator, dump truck, skid steer and portable water will return on December 12, 2024. The Site is shut down during the week of Thanksgiving.

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

Enforcement activities have identified current and former PRPs (owners and operators of businesses on the Site property). Notice letters and 104 (e) letters have been mailed to PRPs and their responses have been evaluated by enforcement specialist and legal experts.

#### 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

The top one foot of soil will continue to be removed in Areas 4 and 5 where sampling has identified high concentrations (above 800 ppm) of Lead contaminated soil. This soil will then be moved to the stockpile area on the east side near the middle of the facility. The contaminated soil found under the damaged asphalt road will not be addressed until the asphalt facilities open in the Spring 2025.

##### 2.2.1.1 Planned Response Activities

Contaminated soil in the stockpile area will be treated with chemicals which will render the lead in the soil nonhazardous. The treated contaminated soil will then be shipped to an EPA approved disposal facility. Clean fill and topsoil will be placed in the areas where the contaminated soil was removed. Areas where disturbed asphalt pavement was removed will be replaced with new asphalt pavement.

##### 2.2.1.2 Next Steps

- Continue enforcement process
- Continue soil excavation
- Stockpiling, treatment, and disposal of soil

## 2.2.2 Issues

Not applicable

## 2.3 Logistics Section

Not applicable

## 2.4 Finance Section

### 2.4.1 Narrative

An action memorandum requesting \$3,431,232 was signed by the division director on 09/05/2024. The current ceilings for START and ERRS are summarized in the table below.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$2,309,880.00	\$5,12,383.00	\$1,797,497.00	77.82%
TAT/START	\$673,800.00	\$35,998.00	\$637,802.00	94.66%
Contingency	\$447,552.00	\$0.00	\$447,552.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$3,431,232.00</b>	<b>\$548,381.00</b>	<b>\$2,882,851.00</b>	<b>84.02%</b>

\* 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

The OSC will act as the Safety Officer.

### 2.5.2 Liaison Officer

Not applicable

### 2.5.3 Information Officer

Not applicable

## 3. Participating Entities

### 3.1 Unified Command

Not applicable

### 3.2 Cooperating Agencies

IDEM  
Michigan City, IN

## 4. Personnel On Site

EPA - OSC 1  
ERRS - EQM 5 (Sub-HEPACO 2)  
START - TetraTech 1

## 5. Definition of Terms

BGS - Below Ground Surface  
CERCLA - Comprehensive Environmental Response, Compensation and Liability Act  
ERC - Environmental Restrictive Covenant  
DCISL - Direct Contact Commercial/Industrial Screening Levels  
ERRS - Emergency and Rapid Response Services  
IDEM - Indiana Department of Environmental Management  
NCP - National Contingency Plan  
OSC - On-Scene Coordinator  
PPM - Parts Per Million  
PRP - Potentially Responsible Party  
RCG - Remediation Closure Guide  
RMLs - Removal Management Levels  
START - Superfund Technical Assessment and Response Team  
VOC - Volatile Organic Compound  
UAO - Unilateral Administrative Order

**6. Additional sources of information**

**6.1 Internet location of additional information/report**

[www.response.epa.gov/sanduskyabrasives](http://www.response.epa.gov/sanduskyabrasives)

**6.2 Reporting Schedule**

Pollution Reports (POLREPS) will be sent weekly or as necessary.

**7. Situational Reference Materials**

NCP  
CERCLA  
Regional RMLs