



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

October 24, 2024

## VIA E-MAIL

Honorable Mayor Morris Graves  
City of Cannelton  
210 South Eighth Street  
Cannelton, Indiana 47520  
[Canneltonmayorusa@gmail.com](mailto:Canneltonmayorusa@gmail.com)

## Re: **Summary Letter**

Dear Honorable Mayor Graves:

On October 21, 2024, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted a compliance assistance visit of the former Can Clay Corporation property, located at 402 Washington Street, Cannelton, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	Compliance Assistance Visit
Results of Inspection:	Conclusions and recommendations were noted (see attached report).

Please direct any questions regarding this letter to Troy South at 317-519-6896 or e-mail [tsouth@idem.IN.gov](mailto:tsouth@idem.IN.gov).

Sincerely,

Troy South, Sr. Environmental Manager  
Industrial Waste Section  
Compliance Branch  
Office of Land Quality

Enclosure  
cc: Perry County Health Department



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*





**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF LAND QUALITY**

*Compliance Assistance Visit*

**EPA ID NUMBER:** Non-notifier  
**NAME:** Former Can Clay Corporation  
**ADDRESS:** 402 Washington Street  
**CITY & COUNTY:** Cannelton, Perry County  
**INSPECTION DATE:** October 21, 2024  
**INSPECTOR(S):** Troy South, Chad Pittman

<u>PERSON INTERVIEWED</u>	<u>TITLE</u>	<u>TELEPHONE</u>
Morris Graves	Mayor	812-547-8994
Brian Kleeman	Cash Waggner & Associates	812-401-5561

**PRE-INSPECTION INFORMATION**

The former Can Clay Corporation site was a clay pipe manufacturer from 1906 until final operations ended in 2019 and consists of approximately 26 acres located in Cannelton, Indiana. The property was reportedly privately held until it was acquired by Perry County due to a tax-lien and is now owned by the City of Cannelton as of November 2019. An initial complaint inspection was conducted by IDEM on June 8, 2020 which found violations of solid waste management rules [See IDEM Virtual File Cabinet (VFC) Document #82991343]. A follow-up compliance assistance visit was completed by IDEM October 21, 2020 (VFC #83085560). A summary letter was sent by IDEM October 5, 2021 to the Mayor of Cannelton providing guidance to assist in redevelopment plans for the site (VFC #83225717).

A Blight Clearance Report dated August 29, 2022 was prepared by Atlas Technical Consultants summarizing removal of asbestos from site structures as well as solid waste removal including sawdust (outdoor silo), brick/fire brick/rubble, waste tires, PVC (polyvinyl chloride) pipe debris, and contents of various waste containers (drums, buckets, cans, above ground tanks) (VFC #83469524). A Debris Removal Report dated January 11, 2024 was submitted to summarize the removal of stockpiled debris at the former Clay Shed Site (VFC #83701504). The consultant provided photos of work after completion (See Photo Log, Photos 27 and 28).

A Project Status Letter was issued by Indiana Brownfields Program on October 28, 2020 summarizing assessment and/or remediation activities to date (VFC #83065654). A Remediation Completion Report dated February 27, 2024 was prepared by Cash Waggner for Indiana Brownfields Program summarizing removal of electrical transformers containing PCBs (polychlorinated biphenyls) and for removal of asbestos from structures at the site (VFC #83602936). A Phase II Further Site Investigation Report dated March 1, 2024 was prepared by Cash Waggner for Indiana Brownfields Program to evaluate the shallow soils/surficial materials, near the former transformers that were removed, to determine PCBs impacts (VFC #83607564).

**INSPECTION FINDINGS**

IDEM staff travelled to the site on October 21, 2024 to conduct a compliance assistance visit and evaluate progress in addressing regulated waste left at the site from historical operations. IDEM staff met local government representatives, Mayor Morris Graves and Clerk-Treasurer John Paulins, at the site along with their consultant, Mr. Brian Kleeman, of Cash Waggner & Associates. This group and IDEM staff proceeded on a tour of the facility property.

There are remnants of the former Tunnel Kiln building demolition remaining at the property that needs properly disposed (See Photo Log, Photos 1 through 10). A debris pile and refractory material were located near the former Machine Shop, demolition material was seen at the former Stick Building concrete pad, and next to the remainder of the former Joint Building (See Photos 11 through 15). Mayor Graves explained that GN Excavating has been contracted to remove remaining solid waste demolition debris in 40-cubic yard roll-off containers beginning this week. Documentation of waste disposal needs provided to IDEM.

Blue River has been contracted to demolish/dispose the remaining part of the Joint Building (white block building) and their staff were on-site preparing at time of inspection (See Photos 8 and 16). This structure has a small silo inside that Mr. Kleeman thinks may contain gypsum. Waste determination and disposal are planned and needed for this material in conjunction with the building demolition. Documentation of waste disposal needs provided to IDEM.

The group and IDEM staff walked across First Street to the west of the flood wall and observed that piles of broken clay pipes remain in the area along the Ohio river (See Photo 23). No cleanup has occurred in this area.

A labeled drum in good condition containing new gear lubricant was found on a pallet at the site (See Photos 17 and 18). City staff indicated they would move the drum inside the building at the Street Department for use in equipment. An open drum containing what appeared to be clay was found at the former Machine Shop building (See Photo 19). Two five-gallons size pails of what appeared to be roofing sealants were found near the Joint Building (See Photo 20). Contents of these containers need a waste determination prior to disposal and documentation provided to IDEM.

The group and IDEM staff continued to the former production areas to look at the ash pits (See Photos 24 and 25). Mr. Kleeman indicated ash pits would be resampled due to questions about previous sampling results and collection locations. The city does not have any immediate plans to demolish the five formerly used kilns and buildings located along Adams Street (See Photo 6, 21, and 22).

## **CONCLUSIONS AND RECOMMENDATIONS**

Removal of solid waste and debris have progressed at the site since the initial IDEM compliance inspection was conducted during 2020. Cleanup and remediation of the site have been documented with written reports. Management of ongoing solid waste and debris should proceed in accordance with environmental rules, waste determinations, and proper disposal.

There is a historical dumping area of primarily broken clay pipe located on the west side of the First Street flood wall along the Ohio river. Solid waste debris in this area needs removal and disposed. Prior to any work being conducted in areas along the river, the facility should coordinate with IDEM Office of Water Quality and Army Corp of Engineers for guidance.

Ash remaining in subgrade pits was proposed to be removed and disposed off-site as described in your legitimate use application dated June 2023. If the plans have changed regarding ash disposal, submit requests to reuse materials and/or requests seeking solid waste closure in place to IDEM as soon as feasible. IDEM staff requested additional information regarding ash sampling, legitimacy justification, and cover design plans (VFC #83705710). If you choose to close in place, a closure plan must be submitted to the IDEM. The closure plan must be consistent with the provisions of 329 IAC 10-37.

Further remediation and documentation of PCBs impacted areas should proceed in accordance with environmental rules and the Indiana Brownfields Program.

## Photo Log



### Photo 1

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris solid waste at the former Tunnel Kiln Building.



### Photo 2

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris solid waste at the former Tunnel Kiln Building.



### Photo 3

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris solid waste at the former Tunnel Kiln Building.

## Photo Log



### Photo 4

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris solid waste at the former Tunnel Kiln Building.



### Photo 5

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris solid waste near the former Tunnel Kiln Building.



### Photo 6

Facility Name: Former Can Clay Corp.

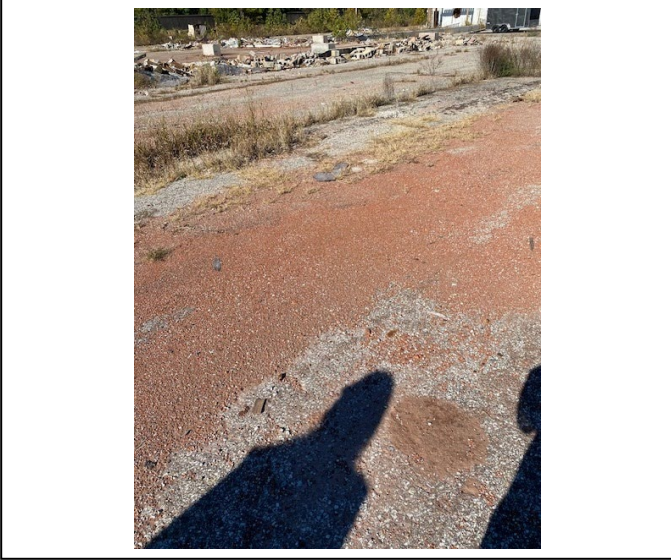
Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Solid waste debris pile on parking lot.

## Photo Log



### Photo 7

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris and clay pipe remnants on former building foundations.



### Photo 8

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Solid waste debris and clay pipe fragments on parking lot. Remainder of the Joint Building seen in background (white block building).



### Photo 9

Facility Name: Former Can Clay Corp.

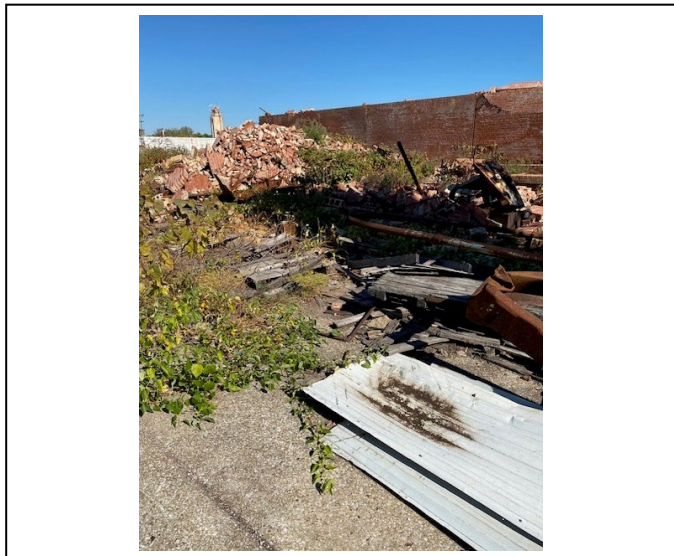
Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Solid waste debris piles north of production buildings.

## Photo Log



### Photo 10

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Demolition debris at former Tunnel Kiln Building.



### Photo 11

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: View of courtyard between production buildings. Solid waste piles are seen in the far background.



### Photo 12

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Refractory brick rubble and demolition debris from production building roof.

## Photo Log



### Photo 13

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Solid waste pile of debris and clay pipe near First Street.



### Photo 14

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Solid waste and insulation from a structure along First Street.



### Photo 15

Facility Name: Former Can Clay Corp.

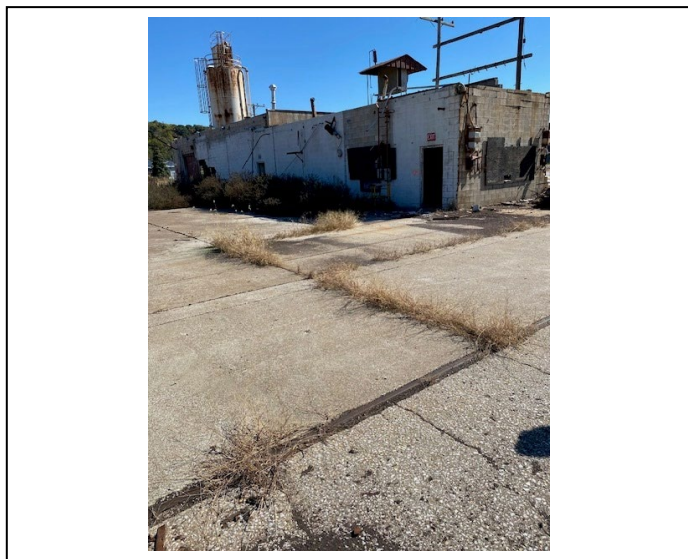
Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Waste piled on the west side of Joint Building. Kilns and production buildings in the far background.

## Photo Log



### Photo 16

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Remainder of Joint Building to be torn down, view of north side.



### Photo 17

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: 55-gallons drum of gear lubricant.



### Photo 18

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Closer view of label on 55-gallons drum of gear lubricant.

## Photo Log



### Photo 19

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Open drum of what appears to be clay under roof at former Machine Shop.



### Photo 20

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Two 5-gallons capacity pails found west of the Joint Building.



### Photo 21

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Former Kilns exterior.

## Photo Log



### Photo 22

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Former Kiln interior.



### Photo 23

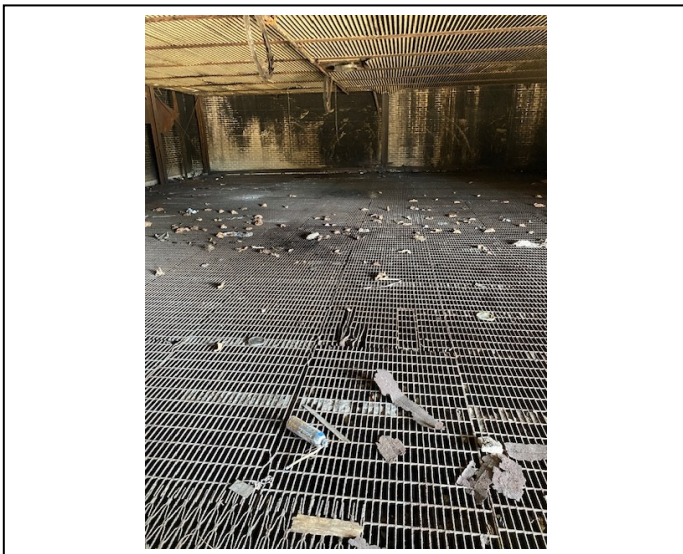
Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Broken clay pipes are still located west of the floodwall along First Street.



### Photo 24

Facility Name: Former Can Clay Corp.

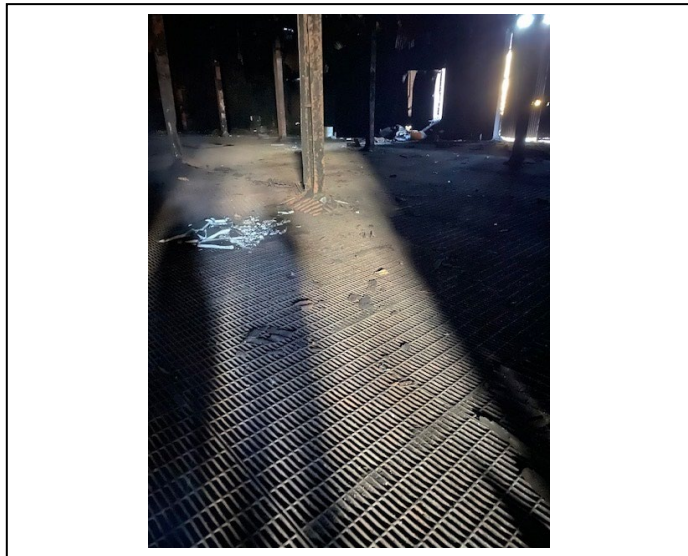
Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Ash pit located inside drying area of a production building.

## Photo Log



### Photo 25

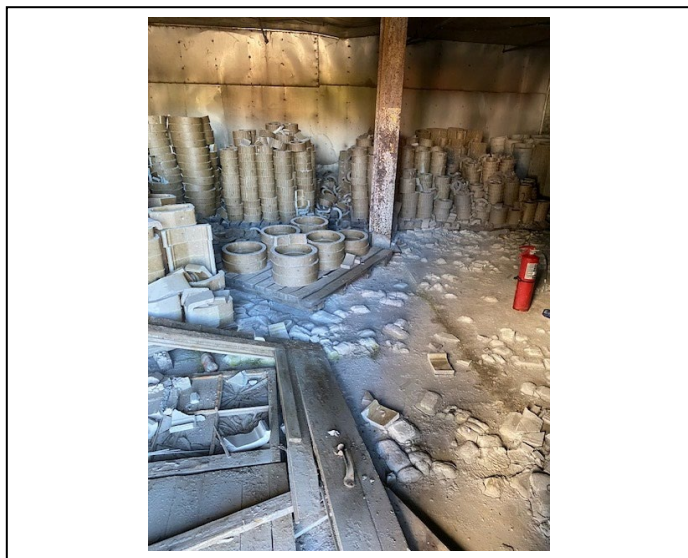
Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Ash pit located inside the former production area.



### Photo 26

Facility Name: Former Can Clay Corp.

Photographer: Troy South

Date: October 21, 2024

Others Present: Chad Pittman (IDEM), Morris Graves, John Paulin, Brian Kleeman

Location & Description: Clay products that were never fired in a kiln located on the lower level of the Production Building.



### Photo 27

Facility Name: Former Can Clay Corp.

Photographer: Brian Kleeman

Date: December 12, 2023

Others Present: N/A

Location & Description: Clay Shed Site after grog removal.

## Photo Log

### Photo 28

Facility Name: Former Can Clay Corp.

Photographer: Brian Kleeman

Date: December 12, 2023

Others Present: N/A

Location & Description: Clay Shed Site after building removal.

