

OHIO EPA
TIME-CRITICAL REMOVAL ACTION
REFERRAL PACKAGE

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OHIO EPA

JAN 23 2001

DIV. OF HAZARDOUS
WASTE MGT.

I. SITE LOCATION AND RESPONSIBLE PARTY INFORMATION

A. SITE NAME: Candy's Radiator Service

B. LOCATION: 5111 Globe Avenue, Norwood, Hamilton County, Ohio 45222

C. OWNER(S)/OPERATOR(S)

Addlin Estell (mailing address same as facility)

D. BRIEF DESCRIPTION OF STEPS TAKEN TO COMPEL RESPONSIBLE PARTY(IES) TO CONDUCT SITE REMEDIATION:

05/13/91 Ohio EPA Unilateral Director's Final Findings and Orders for closure, which led to the Agency's review of financials, which in turn led to a qualified determination that Addlin Estell (dba Candy's Radiator Service) probably can not pay for the closure. Although Estell did have a consultant develop a closure plan which Ohio EPA approved, she had no resources to implement it. In late 2000 and again in 01/01, Ohio EPA DHWM discussed the remediation with DERR's Special Investigation Section, who investigated but could not do the remediation due to limited resources. See attached documents for more detail.

II. SITE DESCRIPTION AND BACKGROUND INFORMATION:

A. DESCRIPTION OF PAST OR PRESENT OPERATIONS AND HOW WASTES WERE GENERATED:

This Facility has long been an automotive repair shop, and also did radiator repair until the early 1990s. Workers at Candy's periodically dumped solid and liquid residues from a boil out cleaning tank for automobile radiators on the ground behind the facility. Analysis of the bottoms found a pH of 13.0 and an EP toxicity value of 2700 ppm for lead. Analysis of the soil from behind the garage found lead to be present at up to 107,000 parts per million.

B. SITE CHARACTERISTICS:

- **Site layout (size, number of buildings, topography, etc.):**

Single location business, single building, unpaved disposal area immediately behind building on slight slope. Map attached.

EPA Region 5 Records Ctr.



254985

- **Quantity and type of Wastes and/or Hazardous Substances:**

See "A" above, D008 (lead) and D002 (corrosive) waste disposal/constituents of concern. Sampling results attached.

- **Analytical Data or Other Documentation on Chemical Characterization of Wastes Present (attach Analyticals):**

Analyticals and 09/07/00 email summarizing attached.

- **Condition of Containers:**

N/A, soil contamination, no RCRA containers of concern.

- **Proximity to Population and Population Density:**

Residential area, neighbors on three sides of area where disposal occurred.

III. THREATS TO PUBLIC HEALTH AND THE ENVIRONMENT

A. DESCRIPTION OF POTENTIAL EXPOSURE TO HUMANS, ANIMALS OR THE FOOD CHAIN FROM HAZARDOUS SUBSTANCES OR CONTAMINANTS:

Because of disposal practices occurring over a long period of time, high contamination levels are present in an unsecured area, posing the potential for direct exposure to humans and animals. Furthermore, the area in which disposal occurred slopes toward neighboring properties, and because dumping occurred over a long period of time, the possibility for off-site migration and contamination of adjacent residential properties exists.

B. ACTUAL OR POTENTIAL FOR RELEASE PRESENT:

some areas no longer support vegetation, inhalation pathway.

C. THREAT OF FIRE OR EXPLOSION:

none known

IV. ASSESSMENT OF ENVIRONMENTAL HAZARDS AND PROPOSED RESPONSE ACTIONS

A. DESCRIPTION OF HAZARDS (REAL AND POTENTIAL) POSED BY SITE AND WHAT ACTIONS SHOULD BE UNDERTAKEN TO REDUCE OR ELIMINATE HAZARD:

Potential for exposure to dust containing high lead levels. Contaminated soils should be removed and replaced with clean backfill.

V. CHRONOLOGY OF EVENTS

1. see attached referral and orders for early history, including 1993 closure plan approval.

2. 11/99 SWDO DHWM discusses on-going need for action;
3. 08/02/00 SWDO DHWM memo to CO DHWM requesting letter to US EPA for contaminated soil removal at the facility;
4. 09/00: Following review of closure plan status, DHWM attempts (phone calls and 09/17/00 letter) to get additional/updated financial information from company;
5. 10/00 DHWM coordinated with DERR, requesting sampling and possible removal of contaminated soils. After preliminary site work and sampling on 10/11/00, DERR determined it had no resources to do the clean up;
6. 01/01 DHWM request to US EPA for removal of contaminated soils.

VI. INDEX OF DOCUMENTS

1. 02/01/90 enforcement referral package;
2. 02/02/90 analyticals correction sheet;
3. 02/27/90 DHWM corporate check;
4. 03/02/90 field notes, SWDO DHWM;
5. 02/25/91 SWDO DHWM letter to company's consultant re: closure plan development;
6. 05/13/91 Director's Final Findings and Orders, Unilateral, required closure;
7. 06/29/93 closure extension letter SWDO DHWM to Candy's Radiator;
8. 11/16/93 memo from Fiscal Office, qualified finding that the owner had impaired ability to pay for implementing the approved closure plan. Predicated on limited information submitted.
9. 10/14/93 letter SWDO DHWM to Candy's Radiator again requesting financials;
10. 08/24/99 memo SWDO DHWM to CO DHWM requesting an updated financial determination re: Candy's ability to pay for closure;
11. 09/17/99 letter CO DHWM to Candy's re: directive to submit financials;
12. 11/08/99 memo to file re: trying to get financials from Candy's Radiator;
13. 08/02/00 memo SWDO DHWM to CO DHWM re: requesting US EPA assistance in the removal of contaminated soils at the facility;
14. 09/07/00 email CO DHWM to SWDO DHWM re: discussing with and requesting DERR assistance in removal and laying out preliminary sampling information;
15. 10/04/00 email misc. traffic re: sampling protocol;
16. 10/04/00 email series re: DERR request before asking US EPA formally to assist;
17. 10/10/00 email lays out decision re: DERR/ site assessment requirements;
18. 10/12/00 email re: sampling on site;
19. 10/13/00 memo SWDO DHWM to DERR SIU re: sampling points and site history;
20. 10/20/00 email re: DERR decision that had no resources to do the removal.
21. 01/16/01 memo SWDO DHWM to CO DHWM, misc discussion of referral.

VII. EXTENUATING OR MITIGATING CIRCUMSTANCES

1. N/A

VIII. CONTACTS

District Office: Chris Cotton DHWM SWDO @ (937) 285-6093

Central Office: John Schierbeck DHWM EU @ (614) 644-2955

IX. SIGNATURES

Signed:  Date: 1/22/01

Approved: _____ Date: _____

DATA SUMMARY - CANDY'S RADIATOR SERVICE, NORWOOD, OHIO**

<u>Sample Point</u>	<u>Sample Depth</u>	<u>Lead Concentration (mg/l)</u>
A	Surface	107,000
A-2	2 feet	90
B	2 feet	4520
C	1 foot	268
D	1.5 feet	12,700
E	2 feet	2,230
F	1 foot	7,700
1	1 foot	800
	2 feet	21.2
	3 feet	31.9
	4 feet	47.1 & 52 (duplicates)
2	1 foot	7.6
	2 feet	82
3	1 foot	384
	2 feet	122
	3 feet	37.6
	4 feet	142
	5 feet	289
4	1 foot	245 & 123 (dups)
	2 feet	17.8
5	1 foot	2,852
	2 feet	501
6	1 foot	14,950
	2 feet	853
	3 feet	78 & 83 (Dups)
7	1 foot	520
8	1 foot	556
9	1 foot	66
	2 feet	355

DATA SUMMARY - CANDY'S RADIATOR SERVICE (Cont'd)

<u>Sample Point</u>	<u>Depth</u>	<u>Lead concentration (mg/l)</u>
10	1 foot	42.4 & 38.8 (dups)
	2 feet	72
	3 feet	350
	4 feet	91
11	1 foot	5,312
	2 feet	217
	3 feet	217
	4 feet	166
12	1 foot	1,783
13	1 foot	20,940
14	1 foot	24,240

** Note that lettered sample points represent work done by the site's consultant in 1993 during development of a closure plan. Numbered samples are those collected by OEPA/DERR's field investigation unit on 10/11/00.

CANDY'S RADIATION SERVICE SOIL SAMPLING LOCATIONS 10/11/00 (NOT TO SCALE)

