JUNE 29, 1988
FILE 7-3231

REPORT

ENVIRONMENTAL SITE ASSESSMENT
FORMER LURIA BROTHERS SITE
Gary, Indiana

EPA Region 5 Records Ctr.
318399

Prepared For

MR. DEREK S. HAROLD
Project Manager

LURIA BROTHERS
20521 Chagrin Boulevard
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ATEC

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June 29, 1988
File 7-3231

Mr. Derek S. Harold
Project Manager
Luria Brothers
20521 Chagrin Boulevard
Cleveland, OH 44122

REPORT
Environmental Site Assessment
Former Luria Brothers Site
Gary, Indiana

Dear Mr. Harold:

We have completed our environmental assessment of the above referenced site. The work required for completion of this project was designed to provide a basis for the development of a closure plan for this site. This report includes our summary of project information, site observations, sampling results and background information as well as our conclusions. Supporting information is presented in the Tables and Figures Sections. Analytical data is presented in detail in the Appendices.

In summary, our analytical results indicate that surficial soils at the site do not contain volatile organics or heavy metals in concentrations greater than those typically found in developed areas of Northwestern Indiana. During our site visits, however, we did observe several storage tanks, drums and piles of rubbish on-site which should be removed in

accordance with applicable regulations. In addition, it may be prudent to demolish and remove the existing structures to reduce safety hazards and to make the site more attractive for future development.

Project Information

The former Luria Brothers site is located just south of Industrial Highway and west of the EJ&E Railroad tracks in a highly industrialized and commercialized area of Northwest Indiana. This site is adjacent to the CERCLA Conservation Chemical site in Gary, Indiana. Luria Brothers operated a mill scale deoiling facility on this site from 1978-1981. During this time, approximately 30,000 tons/month of scale containing approximately 1% lubricating oil was processed at this facility. This material was generated by the Inland Steel Company and the deoiled mill scale was returned to Inland after processing.

In addition, a small amount (approximately 659 tons) of waste water treatment plant sludge from Bethlehem Steel's Burns Harbor facility was also processed and returned to the generator by Luria Brothers. It was determined that the waste water treatment plant sludge may be a hazardous waste under the Resource Conservation and Recovery Act (RCRA) regulations, therefore Luria filed a Part A Permit Application with the U.S. EPA Region V as a hazardous waste treatment facility. This filing was undertaken purely as a precautionary measure. Later, Luria Brothers requested that this permit application be withdrawn. To date, this permit application has not been withdrawn by the U.S. EPA or the Indiana Department of Environmental Management (IDEM). Also, in correspondence dated June 1, 1987 the Indiana Department of Environmental Management requested that a closure plan be submitted for this facility.

Plant Operations

The raw mill scale was transported to the site by truck and stockpiled to the east of the processing unit. This material was then transferred by a front end loader to a conveyor where trash and large scrap were removed. The raw mill scale was introduced into a rotary kiln via another conveyor. Using natural gas or #2 fuel oil the raw mill scale was heated in the kiln to the point that the oil was volatilized and burned. The deoiled mill scale was then removed from the kiln and stacked for reclamation by a front end loader. Finally, processed mill scale was then transported by truck to the original generator.

The products of combustion from the rotary kiln were directed to an exhaust stack where after-burners, also fueled by natural gas or #2 fuel oil, further oxidized the combustibles. The particulates in the exhaust gases were then removed by a wet scrubber before being discharged to the atmosphere. The dirty scrubber water was directed to a concrete bunker/basin where the particulates were allowed to settle out. The treated water was then recycled back to the scrubber system. The settled particulates were periodically removed from the basin and returned to the generator together with the processed mill scale. The layout of this facility is shown in the attached figures.

FIELD ACTIVITIES

Our field activities consisted of an initial site walk through with a visual assessment and soil sample collection for laboratory analysis.

Site Observations

Our initial site walk through and visual assessment was conducted on February 10, 1988. The facility consists of an abandoned kiln building, associated equipment, and the facility grounds. Our survey encountered four (4) primary areas of interest. As shown in Figures 1 and 2, these areas are:

1) two (2) above ground storage tanks
2) fifteen (15) 55-gallon storage drums
3) former raw mill scale stockpile site
4) former processed mill scale stockpile site

During our site walk through we encountered two (2) above ground storage tanks as shown in Figure 1. Both tanks are cylindrical, oriented horizontally, and appear to be in good condition. From our field measurements, we estimate that tank #1 has a volume of approximately 1,500 gallons and tank #2 has a volume of approximately 7,500 gallons.

Fifteen (15) 55-gallon and two (2) 20-gallon storage drums were encountered on the site as shown in Figure 2. A summary of drum contents, labeling and condition is presented in Table 3. In general, drums were labeled as containing scrap metal, turbo oil, or ethylene glycol (anti-freeze). Other drums were unlabeled or empty. In addition, the two former mill scale stockpile areas are of interest because they contain materials imported to this site.

Soil Sampling

Six (6) soil samples were collected from the former mill scale piles at the locations shown in Figure 1. Three (3) samples were collected from the former raw mill scale stockpile located east of the main kiln building. In addition, three (3) samples were collected from the former processed mill

scale stockpiles southwest of the main kiln building. Discrete samples were collected from the top six (6) inches of soil through use of a pick and hand shovel. No unusual colors or odors were noted during our sampling activities.

To minimize the possibility of contamination between samples, the sampling devices were decontaminated between sampling events by an Alconox wash and distilled water rinse. Approximately equal amounts of material were obtained from each sampling location, placed directly into appropriate containers, preserved at 4 degrees Celcius, and transported over night to the laboratory for analysis accompanied by proper chain-of-custody documents. This sampling program was reviewed by the Indiana Department of Environmental Management (IDEM) and found to be acceptable prior to its implementation.

Analytical Results

To assess the possibility of contamination from the former mill scale stockpiles at the site, the discrete soil samples were analyzed for volatile organic compounds (VOC's) as well as total and E.P. toxic RCRA heavy metals as requested by IDEM. The results of these analyses are summarized in Tables 1 and 2. The complete analytical data, together with laboratory QA/QC procedures are presented in the Laboratory Data/Soils Section.

With the exception of trace concentrations of Methylene Chloride detected in all six samples, all VOC's were below quantitation levels in all samples. Methylene Chloride is a common in-house laboratory contaminant. Also, Methylene Chloride was found in the method blank; providing strong evidence that this contaminant is likely a laboratory artifact.

TABLES

As shown in Table 1 the concentrations of all E.P. toxic heavy metals for these samples are well below the levels required to classify a material as a characteristic hazardous waste. The concentrations of total RCRA heavy metals found in the six soil samples are at or near typical levels for these metals in soils in the the Northwest Indiana area.

BACKGROUND INFORMATION

As referenced earlier, the former Luria Brothers site is located immediately adjacent to the Conservation Chemical site and an auto salvage yard in a highly industrialized and commercialized area of Northwest Indiana. The Gary Municipal Airport lies immediately eastward, followed by MIDCO II, a CERCLA (Superfund) site. Immediately south and southwest lies a wide former lowland area which received an estimated one million cubic yards of petroleum tank bottoms from several sources. An operating sanitary landfill is located further south and south west followed by a CERCLA former landfill. In addition, we have been informed that prior to 1967 this site was owned and operated by the Berry Oil Company, a petroleum refinery company.

The Conservation Chemical site has been placed on the National Priority List by the U.S. Environmental Protection Agency and is presently the subject of CERCLA remedial action. Conservation Chemical (CCI) operated as a chemical recycler until December, 1985.

When CCI ceased operations, their liquid waste inventory included neutralized acid sludge, PCB contaminated fuel oil and asphalt, various cyanide solutions, chlorinated solvents, silica tetrachloride, ferric chloride and pickle liquor. In addition, analytical testing performed by the U.S. EPA indicates that a variety of organic compounds and heavy metals are present in the ground water at the CCI site.

The CCI site as well as the present operation at the neighboring auto salvage yard, former operations of the petroleum refinery and adjacent land users have the potential to adversely impact the soils and ground water of the former Luria Brothers site. Although the CCI site is presently the subject of remedial action and is the responsibility of identified potentially responsible parties, it's impact upon the former Luria Brothers site has not been established.

CONCLUSIONS

Based upon our discussion of facility operations with you, our visual observations and analytical testing of surficial site soils, we do not believe that the surficial soils at this site pose any environmental or health hazard and should be of no regulatory significance.

We do however, recommend that both above ground storage tanks be removed from this property in accordance with applicable regulations. We also recommend that all 55 and 20 gallon storage drums be removed in accordance with applicable regulations. Finally, we recommend that any miscellaneous trash or rubble present on site as well as the existing site structures be removed from this property. We are presently engaged in removal efforts for the storage tanks and drums.

TABLES

If you have any comments or questions concerning our scope of work in this study or further insight into regualtory requirements for an approved closure plan, please contact us.

We trust this information is sufficient for your current needs.

Very truly yours,
ATEC Associates, Inc.

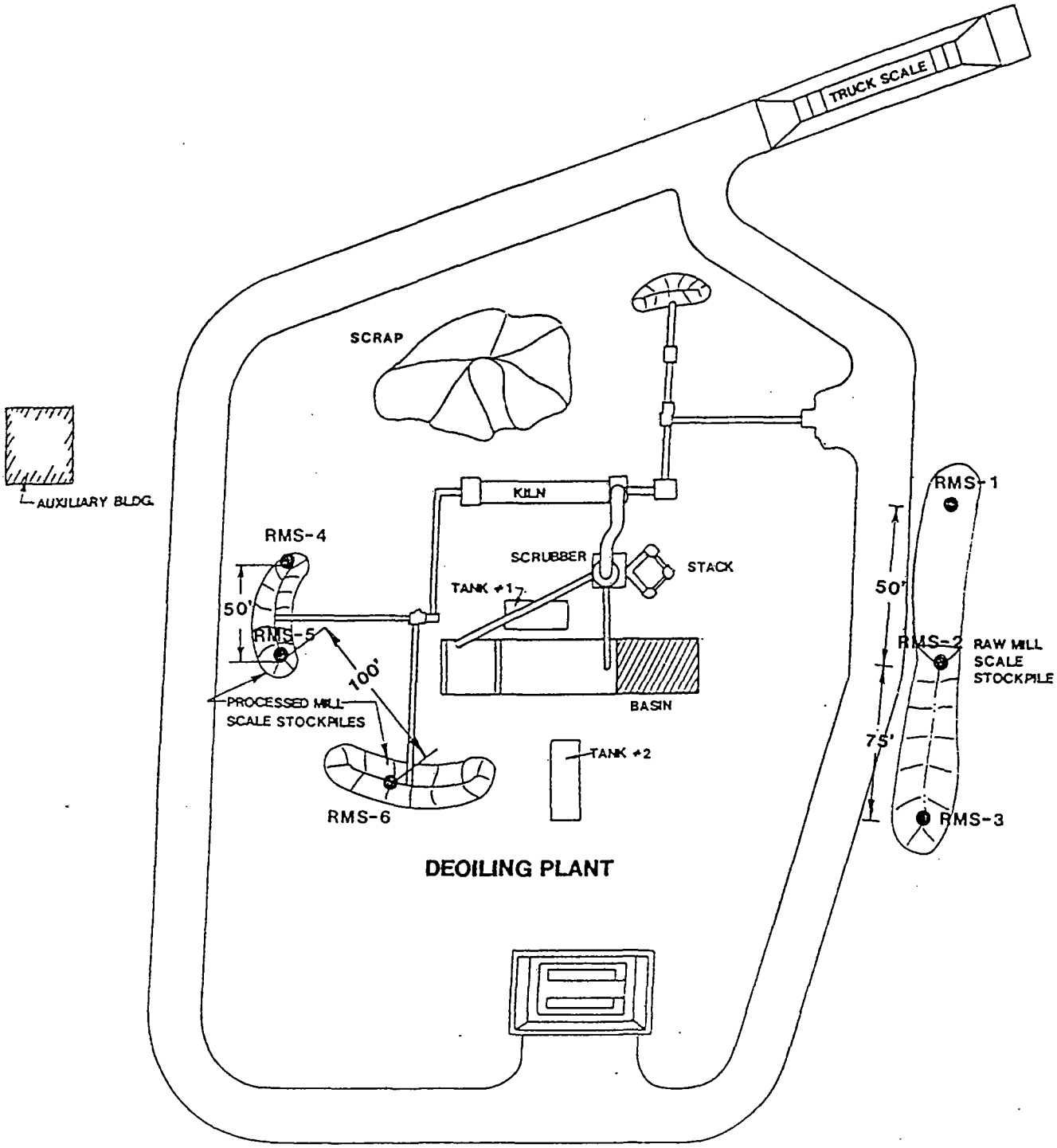
John M. McBride
Hydrogeologist

John W. Weaver II, P.E.
Vice President

cc: J. Mattes, IDEM

JMM:JWW/ls

TABLES



LEGEND:

● RMS-1 - SOIL SAMPLE LOCATION

SITE PLAN and SOIL SAMPLE LOCATIONS

FORMER LURIA BROTHERS SITE
DEOILING PLANT
GARY, INDIANA

DATE	4/5/88	FILE	7-3231
SCALE	None	FIGURE	1

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