

## ADAMS CENTER LANDFILL, INC.

AN SCA SERVICES COMPANY  
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July 12, 1985

EPA Region 5 Records Ctr.



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DIVISION OF LAND  
POLLUTION CONTROL  
STATE  
BOARD OF HEALTH

David D. Lamm  
Director,  
Division of Land Pollution Control  
Indiana State Board of Health  
1330 West Michigan Street  
Indianapolis, IN 46206

Dear Mr. Lamm:

This is in reply to your letter of July 5, 1985, to Sid Beckwith, concerning disposal of F008 waste from closure of the plating operation at the Bendix Amphenol plant in Franklin, Indiana.

The precise chain of events leading to the contamination problem at the site is not known. The remedial action contractor who performed the clean-up said pipe leakage or accidental spillage over the years is suspected. We indicated on the Waste Material Profile Form submitted on May 3, 1985, that the process generating the waste was "closure of a plating operation." We believe that is an accurate statement of the process.

The second question has to do with the appropriate designation of this waste. The course of events relating to this begin with an environmental audit at the facility which uncovered the contamination problem. More detailed sampling and analysis discovered that the primary hazardous constituent of concern was cyanide. The testing also indicated minute traces of volatile chlorinated organics.

The remedial action plan prescribed removal and disposal of contaminated flooring and liner; in-situ treatment of the contaminated soil with sodium hypochlorite until cyanide levels were reduced to 10 ppm total; and then removal and disposal in a RCRA landfill. After verification analysis was made of samples from the removed soil, the generator and Adams Center agreed that D008 was the most appropriate designation. About this time Adams Center received the generic approval letter, and staff realized that a special approval letter was not required. It was at that time that Susan

Griggs conferred with Jami Thais. We thought there was agreement on this, and that the agency understood that the request for special approval was withdrawn. We should have written to confirm our conversation and withdraw the request. We regret any inconvenience and trouble this may have caused Mr. Harbert.

Your other question relates to why other waste designations were not also, or more, appropriate. As mentioned earlier, the primary hazardous constituent of concern was cyanide. There is nothing in our knowledge of the situation which would form a basis for designating the waste F005. Admittedly, F006, F007 and F009 are potential designations because they are related to plating operations where cyanide is used. However, F006 is not a proper designation because it relates to sludges from waste water treatment of plating wastes. The contamination found at the site was not linked with the waste water treatment plant.

F007, F009 and F008 are related because they stem from plating operations which use cyanide, and the constituent of concern is cyanide salts (40 CFR 261, Appendix VIII). F008 is clearly distinguishable from F007 and F009 because it is a sludge and suggests solids; whereas the other two are clearly cyanides in solution. We stand by the designation. The cyanide bearing waste was a solid from a plating operation using cyanide.

Enclosed are copies of our internal documentation concerning this waste including our generic approval checklist and analyses of the waste. Other documentation concerning the remedial work is available for review.

If there are any further questions regarding this matter, please do not hesitate to call.

Very truly yours,



Patrick J. Haynes  
Director of Public Affairs

Enclosures:

cc: W. Lattz  
T. Chambers  
S. Griggs