REMEDIATION WORK PLAN

FORMER H.K. PORTER FRICTION MATERIALS SITE
1849 SABINE STREET
HUNTINGTON, INDIANA

SME Project Number: 095055.00.001
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Prepared for: The City of Huntington, Cooperative Agreement # BF00E03567-0

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1. INTRODUCTION

SME has prepared this Remediation Work Plan (RWP) for the former H.K. Porter Friction Materials site, located at 1849 Sabine Street, in Huntington, Huntington County, Indiana (the Site). The City of Huntington (the City) received a $991,000 United States Environmental Protection Agency (USEPA) Cleanup Grant in September of 2023. The grant will be used to fund environmental cleanup activities at the Site. This work plan includes descriptions of the Site history and known current environmental conditions; the proposed scope of the cleanup/remediation work; and the estimated project schedule.

However, because the building was deemed structurally unsound, the objective of the remediation activities is to demolish the structure compliant to the USEPA National Emissions Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 61, Subpart M) regulation and without need for building stabilization or abatement of asbestos-containing materials (ACMs) and the asbestos-laden dust. The proposed RWP directs that the building will remain adequately wetted during demolition using misters, fire hoses or other water sources capable of appropriate dust suppression. Water used at the Site for dust suppression will be confined and filtered prior to discharging the water to the City's sewer system and building debris will be transported and disposed as friable asbestos waste. The planned reuse for the Site is undetermined.

2. SITE DESCRIPTION

2.1 SITE LOCATION AND DESCRIPTION

The Site is located at 1849 Sabine Street, Huntington, Indiana and lies in the northeast quarter of Section 14, Township 28 North, Range 9 East. The parcel ID number is 35-05-14-100-255.700-005. The Site is located at an elevation of 745 feet above mean sea level (msl) and is located on the Huntington, Indiana topographic quadrangle. The geographic coordinates at the approximate center of the Site are 40° 53' 17.49" North latitude and 85° 28' 31.37" West longitude.

The Site consists of an approximately 80,000 square-foot, vacant, manufacturing building; paved drives and parking lots; an open field vegetated in grasses; and an overgrown wooded area. The Site is situated on approximately 11.97 acres of land bound to the north by Sabine Street, beyond which is a residential area and church (formerly Lincoln Elementary School); to the east by a residential area; to the south by an active Norfolk Southern Railroad right-of-way, beyond which is a residential area; and to the west by an unnamed alley, beyond which is a residential area.

2.2 HISTORICAL SITE USE

The Site buildings associated with the former manufacturing facility were constructed from 1919 to the 1980s and consisted of a primary manufacturing building, an office building, a research and development building, a pump house, a finished goods warehouse, metal storage buildings, a guard shack, a mill, a solvent recovery area, and a chemical storage area. The former Site buildings were demolished between 2013 and 2020, save for the 80,000 square-foot, former, manufacturing building, which is the final remaining structure.

According to available historical documentation, the facility was operated by H. K. Porter Company, Inc., Asbestos Manufacturing, Inc., and Rapid Race. The original Site owner produced pivots at the Site beginning in 1912. In 1924, the Site was bought by Asbestos Manufacturing Company, Inc. and later sold to H. K. Porter Company in 1960. Friction Materials later purchased the Site in 1986 and used it to manufacture asbestos automotive parts (i.e. brake pads and clutch facings). As part of the manufacturing process, the facility utilized asbestos, various oils, fuels, and solvents. Asbestos was originally stored in a warehouse located about three blocks from the main plant building but was later stored in the plant building itself. The asbestos was taken to the mixing area, which made approximately seven to eight

batches per day. The mixed materials were placed in covered dumpsters, moved to the operations area, and then to the compress area where all asbestos material became permanently bound to metal plates. Throughout the Site's operational history, approximately 220-pounds of asbestos and 400-pounds of lead were used per day in the manufacturing process. Since each customer had certain specifications, the products were taken to specific areas within the plant where several operations such as grinding, drilling, and cutting were performed. Waste from these operations was reportedly disposed at the Huntington City Landfill.

From 1960 to 1986, the Site was operated by H.K Porter, which continued to manufacture brake parts. In 1986, the Site was purchased by Friction Materials, which also continued to manufacture automotive brake parts. Manufacturing operations ceased in 2000, when Friction Materials filed for bankruptcy. In 2001, the Site was purchased at bankruptcy auction by a James Kirwin/Mid-Town who hauled hazardous materials to the Site from other locations leading to an Indiana Department of Environmental Management (IDEM) removal action in 2008. Since 2008, the Site has been vacant. In 2014, the City took ownership of the Site due to tax delinquency. Since then, it has been actively working on the Site's evaluation, cleanup, and repurposing.

2.3 OVERVIEW OF PREVIOUS SITE ENVIRONMENTAL INVESTIGATIONS

We reviewed the following environmental reports related to the Site:

- Tetra Tech's Site Assessment Report dated May 16, 2002;
- IDEM's Pre-CERCLIS Screening Report dated January 17, 2007;
- IDEM's Preliminary Assessment Report dated February 9, 2007;
- SME's Limited Phase II Site Assessment Report dated October 9, 2013, and;
- SME's Hazardous Materials Assessment Report dated October 16, 2013;
- SME's Phase I Environmental Site Assessment Report dated December 20, 2013;
- SME's Confirmation for Wipe Sampling Services Report dated October 28, 2014;
- SME's Demolition and Hazardous Material Removal Report dated July 9, 2015;
- Tetra Tech's Final Removal Assessment Report dated March 11, 2016;
- SME's Dust Wipe Sampling for Asbestos Content Report dated November 30, 2018;
- SME's Revised Hazardous Materials Assessment Report dated December 4, 2018;
- SME's Asbestos-Laden Dust Related Demolition Air Monitoring Report dated February 10, 2020; and
- SES's Asbestos Survey Report dated July 21, 2022.

The cumulative findings of previous Site assessments indicated the presence of various volatile organic compounds (VOCs), and lead in soil and groundwater in excess of IDEM standards. In addition to the presence of asbestos-containing materials present within the current Site building, asbestos-laden dust and/or lead-laden dust were identified throughout the building, the ground surface across areas of the Site, and the ground surface of adjoining residential properties.

3. SITE CONDITIONS

3.1 ENVIRONMENTAL IMPACTS

During previous investigations, hazardous substances have been identified at the Site including hexavalent chromium, lead, and benzene. Remnant asbestos dust remains the primary concern as airborne fibers create a hazard to nearby neighbors, trespassers, and environmental cleanup personnel working at the Site. Furthermore, the ACMs and the asbestos-laden dust are currently impeding the ability of the City to demolish the structure. Most recently, the USEPA has removed three lead hotspots from the site resulting from historical operations, one measuring as high as 5,388 mg/kg (more than 6.7 times the Removal Management Level (RML) for commercial/industrial). In addition, 11 of 36 adjacent residential yards tested positive for lead levels exceeding residential RML of 400, some as high as 933.

The Site is centralized within a neighborhood and is also unsecured, accessible by the public, and poses a public health hazard. The Site has also frequently been subjected to vandalism. Moreover, in April 2022, reportedly a fire caused by arson resulted in substantial structural damage to two areas of the building. During the 2022 arson fire, nearby homes were promptly evacuated to mitigate airborne exposure to burning hazardous substances. In early May 2024, a juvenile entered the Site and climbed to the second-story roof to take photographs. A portion of the roof collapsed underneath which caused the juvenile to fall nearly two stories into a pile of debris and fortunately suffered only minor scrapes and bruises. Neighbors continue to report trespassers and the City notes new signs of vandalism at the site.

3.2 CONTAMINANTS OF CONCERN

The primary objective of the remediation activities is to mitigate risks to human health and the environment posed by the current state of the Site building. Through the demolition of the unsafe structure and disposal of ACMs and asbestos-contaminated dust and debris, additional subsurface investigations can be conducted, the attractive nuisance will be removed, and reuse planning activities can be further discussed.

4. APPLICABLE REGULATIONS AND CLEAN-UP STANDARDS

Cleanup standards for environmental response actions addressing ACMs and asbestos-laden dust associated with the Site building will be in accordance with applicable state and federal asbestos regulations. Applicable or relevant and appropriate regulatory requirements for asbestos removal and/or decontamination activities are presented in the following section.

4.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

Cleanup of the Site is part of a brownfield redevelopment that is consistent with the operational requirements of the 1995 Brownfields Addendum to the Superfund Memorandum of Agreement between the State of Indiana and the USEPA Region 5. In addition to the statutes and rules governing cleanup oversight and standards described above, the following ARARs have been identified for the project:

- Environmental response actions
  - Asbestos
    - 40 CFR 61 National Emissions Standards for Hazardous Air Pollutants
    - 40 CFR 763 Asbestos
    - Indiana Administrative Code 326 IAC 14-10: Indiana Asbestos Work practice standards
    - Indiana Administrative Cone 326 IAC 18-1: Indiana Asbestos Licensing requirements
  - Waste management
    - 40 CFR 260 General Regulations for Hazardous Waste Management
    - Indiana Administrative Code 329 IAC Hazardous and Non-hazardous waste
  - Transportation of wastes
    - 49 CFR 172: Hazardous materials (DOT)
    - 40 CFR 263 Standards Applicable to Transporters of Hazardous Waste
  - Health and safety
    - 29 CFR 1910.120 (HAZWOPER)
    - 29 CFR 1926 (all applicable standards)
    - IC-22-8: Indiana Occupational Safety and Health Act (IOSHA)
- Storm water management
  - Indiana Administrative Code 327 IAC 15

5. REMEDIAL ACTIONS

The City of Huntington retained a structural engineer from Engineering Resources Inc. to review the structural condition of the building. The results of the structural assessment determined that the building, in its current damaged and dilapidated condition, is unsafe for entry and interior work activities. Therefore, the proposed scope of work will involve demolition of the building without removal of the ACMs (asphalt roofing materials, cementitious wall and ceiling panels) or pre-demolition cleanup of asbestos-laden dust. This method of demolition would include keeping the building adequately wetted during demolition using misters, fire hoses or other water sources capable of appropriate dust suppression. Water used at the Site for dust suppression would be captured and filtered prior to discharging the water to the City's sewer system and the resulting building debris would be transported and disposed of as friable asbestos waste. Because the building was deemed structurally unsound, this scope of work can be executed compliant to the NESHAP regulation without need for building stabilization or ACM removal.

This scope of work would also allow for the demolition of the building in accordance with appropriate regulations and subsequent reclamation and recycling of steel, once properly decontaminated. This would reduce the costs for waste stream management and reduce the environmental footprint of the demolition activities, rather than disposal of the material in a landfill. The remaining waste associated with building would be containerized, hauled off-site, and disposed of as friable asbestos waste. A precise cost estimate will require competitive bidding of the project.

All work shall conform with the USEPA National Emissions Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 61, Subpart M) asbestos regulation, the Occupational Safety and Health Administration (OSHA) Asbestos Construction Standard (29 CFR Part 1926.1101) and all other applicable federal, state, and local requirements.

The selected contractor shall maintain a current State of Indiana license as required for the removal, transporting, disposal, or other regulated activity relative to the work of this contract. All employees working directly with asbestos-containing material and wastes must have successfully completed a course of asbestos training as specified by USEPA requirements at 40 CFR Part 763, Subpart E, Appendix C, within one year prior to conducting asbestos abatement activities. Each worker must successfully complete the "Worker" course, and on-site supervisors and technical support personnel must successfully complete the "Project Supervisor" course. Individuals working with asbestos on the project sites shall possess current and applicable State of Indiana asbestos accreditation from IDEM. The controlling employer shall conduct personal air sampling as defined by the previously noted regulations to monitor employee exposure to airborne asbestos fibers for all employees engaged in asbestos-related work activities governed by the OSHA standard.

The technical specifications for the proposed scope of work will be provided in the bid specification package that will be issued by the City.

6. PROJECTED SCHEDULE

The City anticipates the public bid being announced by the spring of 2025 and the proposed work schedule is anticipated to last three to four weeks. A detailed schedule will be provided by the selected contractor during the competitive bidding process.

7. SIGNATURES

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Passionate People Building
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