

## ***Franklin Steel Company (Columbus Steel Drum) Preferred Clean-Up Plan***

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When the Ohio Environmental Protection Agency (Ohio EPA) suspects that soil or ground water on a property is contaminated with hazardous substances, it issues Director's Findings and Orders to the responsible party, requiring an investigation into the nature and extent of contamination and development of proposals to clean up the identified contamination. Ohio EPA then reviews these proposed clean-up activities and issues a Preferred Plan listing selected clean-up alternatives for public comment. After all of the comments are considered, Ohio EPA issues a Decision Document.

This fact sheet explains Ohio EPA's preferred clean-up alternatives for the former Franklin Steel Company (also known as Columbus Steel Drum) site.

### **Site History**

The Columbus Steel Drum Company, Inc. began operations in 1955, changing its name to Franklin Steel Company in 1979. Columbus Steel Drum constructed the current manufacturing facility in 1971 at 1385 Blatt Boulevard in the Gahanna Industrial Park in Blacklick, Franklin County, Ohio.

In 2007, Franklin Steel sold the property to Columbus QCB, Inc. but the business is operated by Industrial Container Services. Franklin Steel manufacturing operations involved reconditioning and recycling of open head and closed head 55-gallon steel drums.

Prior to 1986, when drum inventory was at its peak, approximately 450,000 mostly empty (less than one inch of liquid) drums were stored in three areas of the 38-acre site for processing. These include two 10-acre drum storage areas (now inactive) and the 18-acre active processing/drum storage area. Since 1988, only the 18-acre portion of the site has been used for drum reconditioning and storage operations.

Currently, the active area has approximately 56,000 drums being stored on the ground with an additional 11,000 drums stored inside numerous semi-trailers.



### **Facility Investigation Summary**

Franklin Steel sampled soil, ground water, surface water and sediment to determine the nature and extent of site-related contamination. The investigation was conducted with oversight by Ohio EPA.

The data obtained from the investigations were used to conduct a baseline risk assessment to evaluate the risks to humans and the environment posed by the site, and to determine the need to evaluate clean-up alternatives.

The active portion of the site has numerous small areas with elevated levels of contaminants in the soils and in the sediments of the on-site storm water collection system and Unzinger Ditch.

The contaminants detected in the upper ground water zone beneath the site have not been detected in the lower ground water zone used by the Jefferson Township's public water supply wellfield, which is approximately 2,600 feet northeast of the site.

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The contaminants that pose a threat to human health include:

- metals (arsenic, chromium, iron and lead);
- the polychlorinated biphenyl (PCB) Aroclor 1254;
- semi-volatile organic compounds (SVOCs) (benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, dibenzo(a,h)anthracene, Indeno(1,2,3-cd)pyrene and bis(2-ethylhexyl)phthalate); and
- volatile organic compounds (VOCs) (chloroethane, vinyl chloride, 1,1-dichloroethane, trichloroethene and total xylenes).

The contaminants that pose a threat to the environment include:

- metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc) and
- SVOCs (anthracene, benzo(a)anthracene, benzo(a)pyrene, chrysene, dibenzo(a,h)anthracene, fluoranthene, fluorene, phenanthrene, pyrene and bis(2-ethylhexyl)phthalate).

The risk assessment evaluation showed that the site contamination poses unacceptable risks or hazards to human health and the environment, requiring the need for clean-up actions. The exposure risks associated with this site result from direct contact or ingestion of contaminated soil, sediment and ground water.

To address these exposure risks, clean-up goals were established for the site's contaminants. Using the clean-up goals, 11 different clean-up alternatives were detailed in the July 2009 corrective measures study: four alternatives for soil, four alternatives for sediment, and three alternatives for ground water.

Ohio EPA's preferred clean-up includes a combination of three of the 11 clean-up alternatives presented in the corrective measures study.

## Summary of Proposed Actions

### *Sediment Alternative*

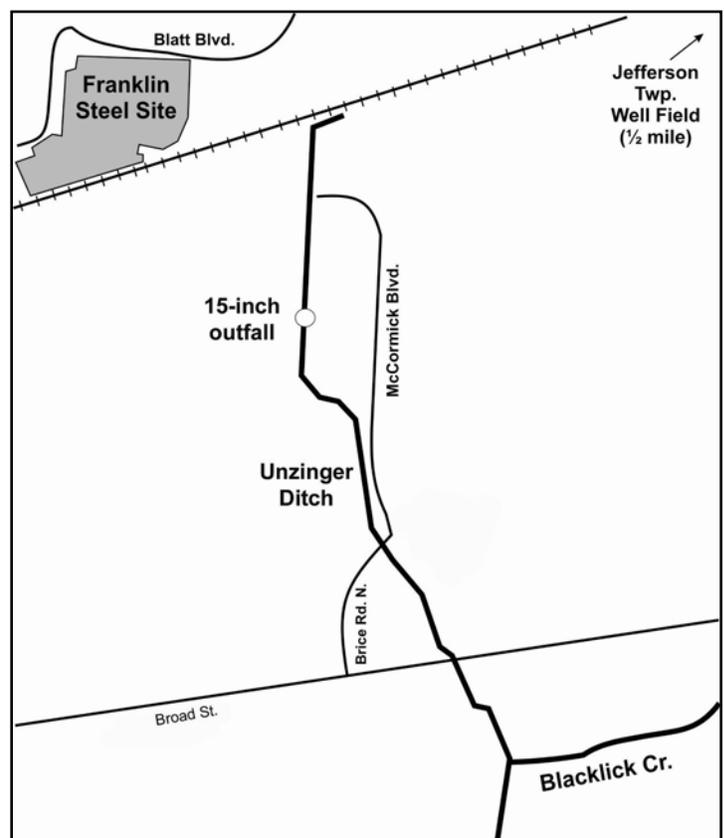
The recommended alternative is to remove contaminated sediment in five areas of Unzinger Ditch where contamination exceeds the clean-up goals.

An average of 12 inches of sediment would be excavated from the targeted areas, which are located below the site's 15-inch storm water outfall in Unzinger Ditch down to the stream's confluence at Blacklick Creek.

The sediment removal operation would involve clearing vegetation; excavating sediment and dewatering as necessary; transporting sediment for disposal at a permitted landfill; and restoring the stream with vegetation and landscaping.

Excavated areas may need to be backfilled with compacted fill materials, such as clay, gravel and top soil, to match the surrounding grade.

Franklin Steel would be required to obtain permits from the U.S. Army Corps of Engineers and Ohio EPA's Division of Surface Water before performing the sediment removal in Unzinger Ditch.



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## Soil Alternative

The recommended alternative is to remove contaminated soil from the 22 uncovered (no concrete) locations in the 18-acre active area where contamination exceeds the clean-up goals.

The five areas currently covered with concrete would be maintained intact as an engineering control to prevent contact with contaminated soil that may exist below.

An average of two feet of soil would be excavated from 21 areas and transported for off-site disposal at a permitted landfill, and one area would have soil removed to a depth of seven to eight feet. Excavated areas would be backfilled with compacted clean fill material to match the surrounding grade.

An operation and maintenance plan would be developed for the annual inspection and maintenance of the five concrete covered areas.

The institutional control would restrict the future use of the site to industrial and commercial activities by the establishment of an environmental covenant on the property.

## Ground Water Alternative

The recommended alternative for contaminated ground water is monitored natural attenuation with institutional controls.

Natural attenuation relies on naturally occurring physical, chemical, and biological processes in the site's subsurface materials to limit migration and potentially reduce concentrations of SVOCs/VOCs in the ground water over time.

This alternative includes a minimum two-year compliance monitoring program of the upper ground water zone, followed by an additional three-year detection monitoring program to ensure that the natural attenuation process is effective.

If the natural attenuation process is determined to be ineffective (by an analysis of the ground water sampling results during the compliance monitoring period), a contingent remedy would be implemented

The institutional control would prohibit the use of ground water for potable water purposes at the site by the establishment of an environmental covenant on the property.

## Next Steps

The actual selection of the final remedy will be made after Ohio EPA reviews and analyzes comments received during the public comment period.

Ohio EPA will consider all public comments on this Preferred Plan to select a final clean-up alternative and prepare the Decision Document.

Depending on comments or new information received, the final remedy selected in the Decision Document could be different from the clean-up alternative presented in the Preferred Plan.

All written and verbal comments received during the public comment period will be summarized and addressed in the responsiveness summary section of the Decision Document.

## For Further Information

If you have questions about environmental conditions at the Franklin Steel Company site or comments about the Preferred Plan, please contact:

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The Preferred Plan and other documents about the Franklin Steel site are available at:

Columbus Metropolitan Library

Gahanna Branch

310 Granville Street

Gahanna, Ohio 43230

(614) 645-2ASK (2275)

Hours:

Mon-Thu: 10 a.m. - 8 p.m.

Fri: 10 a.m. - 4 p.m.

Sat: 10 a.m. - 4 p.m.

Sun: Closed

The Preferred Plan and other Franklin Steel (Columbus Steel Drum) documents also may be found at: [www.epa.ohio.gov/cdo/colssteeldrm.aspx](http://www.epa.ohio.gov/cdo/colssteeldrm.aspx).