

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Buffum MKE - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Initial  
Buffum MKE  
C5Y4  
Milwaukee, WI  
Latitude: 43.0813980 Longitude: -87.9059090

**To:** Karen Dettmer, RACM  
Lindor Schmidt, MHD  
Ryan Wozniak, WDHS  
Mark Drews, WDNR

**From:** Kathy Halbur, OSC  
Paul Ruesch, OSC

**Date:** 6/17/2014

**Reporting Period:** 6/10/2014 - 6/17/2014

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	C5Y4	<b>Contract Number:</b>	EP-S5-08-02
<b>D.O. Number:</b>	141	<b>Action Memo Date:</b>	5/14/2014
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	6/10/2014	<b>Start Date:</b>	6/11/2014
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	WDNR
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**1.1.1 Incident Category**

Time Critical Removal Action

**1.1.2 Site Description**

The Buffum MKE Site is a 3-story abandoned industrial building on a small lot in a mixed residential, commercial, and industrial area. The building was constructed in the early 1900's, and many different businesses have operated there over time. The last business to operate at the Site closed in 2008, and

the property has fallen into disrepair.

### **1.1.2.1 Location**

The Site is located at 3456 North Buffum Street, Milwaukee, Milwaukee County, Wisconsin. Residential properties are located to the north and east, the Beerline recreational trail is located to the south, and an operating business is located across the street to the west. Across the Beerline Trail are more residential properties.

### **1.1.2.2 Description of Threat**

There are numerous physical and chemical hazards associated with the Site, including 3 incinerators/ovens, numerous piles of ash, and containers of waste oil, flammable and corrosive materials. Some containers are open, bulging, and/or leaking. There is evidence of waste flowing into floor drains and seeping out a door. Waste from open and spilled drums as well as hazardous ash piles flushes into floor drains with each rain event, as failing portions of the roof allow stormwater to fill the building during rain events. Lead paint chips and friable asbestos are uncontrolled in the building.

MFD issued a warning not to enter the building, and WDHS & MHD have concluded that the conditions at the Site pose a human health hazard to nearby residents. Despite efforts by the City of Milwaukee to secure the building, trespassers are regularly at the Site. On September 27, 2013, RACM sent a letter to EPA requesting assistance. According to RACM, trespassers regularly break into the Site building and debris regularly is dumped onto an asphalt lot despite measures to secure the Site. Broken windows and continued dilapidation of the Site building create entrance points, rendering the building a neighborhood safety hazard.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

On October 31, 2013, representatives from EPA, WDNR, RACM, MDNS, and MFD conducted a Site visit to document conditions and plan for a removal site assessment. Numerous drums and containers were observed in open or poor condition, with visible evidence of spills. On December 12, 2013, EPA collected liquid and solid waste samples from small containers, near incinerators, and spilled on the floor; wipe samples from surfaces of incinerator and fume hood structures; paint chip samples; and building material samples, including suspected ACM. On January 23, 2014, EPA collected additional paint chip samples from the building exterior. On April 21-22, 2014, EPA collected soil gas and groundwater samples, additional wipe samples, and a sample of sludge from the floor drain sump.

Containers noted during site assessment activities include various sizes of buckets, drums, and totes, some of which are open, spilled, and/or damaged. Compressed gas cylinders also remain at the Site. There are piles of ash throughout the building, including in the elevator shaft on the roof. Analytical results for samples indicate that ignitable, corrosive, and toxic hazardous wastes are present in liquid and solid wastes present at the Site. The site assessment also documented metals, SVOCs, and PCBs in solid waste samples at concentrations above WDNR NR 720 soil direct contact RCLs for industrial and non-industrial land uses and EPA RMLs for residential and industrial soils. The solid waste samples also contained PCBs. The sludge in the floor drain sump is hazardous for lead.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

The time critical removal action includes collection and removal of all solid and liquid wastes contained at the Site building. In addition, surfaces containing hazardous ash and dust will be cleaned. Building materials (i.e., peeling lead and PCB paint) that pose a health and/or migration risk will be removed. All associated wastes collected during the removal will be properly disposed of at EPA approved facilities, in compliance with the Off-Site Rule.

#### **2.1.2 Response Actions to Date**

The following activities took place during the initial reporting period (June 10 - June 17):

- A structural engineer performed a visual inspection/assessment of the building and made

recommendations to ensure worker safety;

- A Health & Safety Plan, Emergency Contingency Plan, Site Security Plan, and Air Monitoring Plan were established;
- Work crews mobilized and set up a staging area for personnel, materials, waste containers, equipment and support vehicles on the south side of the building;
- The south and west building entrances were secured as exclusion zones;
- Debris was cleared from entrances and critical pathways, including stairwells, throughout the inside of the building;
- A sample of solid waste material (floor sweepings, ash, dust, sludge) was collected for characterization to ensure proper disposal;
- A perimeter air monitoring network of monitors was deployed in work areas and at building entrances/exits to ensure worker and community safety;
- All containerized wastes were collected from throughout the building and staged for sampling, characterization and eventual shipment for disposal; and
- All empty containers (drums, pails, etc) were collected & cut up for eventual disposal.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The owner of the building is tax delinquent, out-of-state, and unable to care for the building. A signed Consent for Access To Property and a declaration of inability to conduct the cleanup was submitted by the Site owner to EPA on February 26, 2014. There are no known viable previous operators.

**2.1.4 Progress Metrics**

No waste has been transported from the Site as of the date of this POLREP.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

The work plan for this time critical removal action includes collection and removal of all solid and liquid wastes contained at the Site building. In addition, surfaces containing hazardous ash and dust will be cleaned. Building materials (i.e., peeling lead and PCB paint) that pose a health and/or migration risk will be removed. All associated wastes collected during the removal will be properly disposed of at EPA approved facilities, in compliance with the Off-Site Rule.

**2.2.1.1 Planned Response Activities**

The following activities are planned for the next reporting period:

- Removal and staging of non-hazardous debris from the building for shipment & disposal;
- Removal and staging of scrap metal from the building for shipment & recycling;
- Consolidation and repackaging of containers of liquid waste for shipment & disposal; and
- Sampling and analysis of other wastes (such as migrating paint chips) to define disposal requirements.

**2.2.1.2 Next Steps**

See Section 2.2.1.1

**2.2.2 Issues**

The owner of a business that previously operated at the building contacted EPA seeking access to the building to recover personal property and effects that were locked up by City prior to his being able to removal them.

A crew member's vehicle was broken into on Buffum Street in front of the Site and a theft of personal items occurred on June 11, 2014.

### **2.3 Logistics Section**

The ERRS contractor (EQM, Inc.) has established and is maintaining a staging and support zone for all personnel, equipment and supplies.

### **2.4 Finance Section**

#### **2.4.1 Narrative**

TO#141 was issued under ERRS Contract EP-S5-08-02 in the amount of \$500,000.00 on June 3, 2014. In addition, TDD#S05-0001-1405-014 was issued under START Contract EP-S5-13-01 in the amount of \$30,000.00.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

OSCs Kathy Halbur/Paul Ruesch and ERRS RM Mark Douglas serve as on site safety officers. A HASP has been finalized and signed by all workers at the Site. Safety briefings are held each morning prior to initiation of work activity.

#### **2.5.2 Liaison Officer**

OSC Kathy Halbur is serving as the liaison with the community and state/local government agencies. Site visits/inspections were conducted by MFD and Milwaukee Office of Emergency Management & Homeland Security during this reporting period.

#### **2.5.3 Information Officer**

- A fact sheet was finalized and distributed door to door to residences and businesses in the neighborhood. A copy of the Fact Sheet can be found (in English and Spanish) on the project website under the 'documents' section; and
- A repository of the Administrative Record file was established at the following address:

2300 N. Dr. Martin Luther King Jr. Drive  
Milwaukee, Wisconsin 53212

The CIC for the project is Susan Pastor.

## **3. Participating Entities**

### **3.1 Unified Command**

N/A

### **3.2 Cooperating Agencies**

City of Milwaukee  
Redevelopment Authority  
Department of Health  
Fire Department  
Department of Neighborhood Services  
Office of Emergency Management and Homeland Security  
State of Wisconsin  
Department of Natural Resources  
Department of Health Services  
Riverworks Development Corporation

## **4. Personnel On Site**

U.S. EPA - 2  
ERRS (EQM, Inc) - 5  
START (TetraTech, Inc) - 1  
Security Officer Services, Inc - 1  
  
TOTAL - 9

## 5. Definition of Terms

CFR - Code of Federal Regulations  
CIC - Community Involvement Coordinator  
EPA - Environmental Protection Agency  
ERRS - Emergency & Rapid Response Services  
HASP - Health and Safety Plan  
MDNS - Milwaukee Department of Neighborhood Services  
MFD - Milwaukee Fire Department  
mg/kg - milligrams per kilogram  
MHD - Milwaukee Health Department  
MOEMHS - Milwaukee Office of Emergency Management and Homeland Security  
NR - Natural Resources  
OSC - On scene coordinator  
PCBs -Poly-Chlorinated Biphenyls  
ppb - parts per billion  
ppm - parts per million  
RACM - Redevelopment Authority of the City of Milwaukee  
RCL - Residual Contaminant Level  
RML - Removal Management Level  
RM - Response Manager  
START - Superfund Technical Assessment & Response Team  
SVOCs - Semi-Volatile Organic Compounds  
TDD - Technical Direction Document  
VOCs - Volatile Organic Compounds  
WDHS - Wisconsin Department of Health Services  
WDNR - Wisconsin Department of Natural Resources

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

<http://www.epa.gov/Region5/cleanup/buffum/index.html>

<http://www.epaosc.org/BufumMKE>

### 6.2 Reporting Schedule

Progress POLREPS will be issued as significant activities occur.

## 7. Situational Reference Materials

No information available at this time.