

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Federal-Mogul - Removal Polrep
 Initial Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region V**

Subject: **POLREP #1
 Initial POLREP
 Federal-Mogul
 C5G8
 Detroit, MI
 Latitude: 42.3907280 Longitude: -82.9884710**

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From: Brian Kelly, OSC

Date: 4/18/2013

Reporting Period:

1. Introduction

1.1 Background

Site Number:	C5G8	Contract Number:	
D.O. Number:		Action Memo Date:	1/29/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	

Mobilization Date: 4/15/2013 **Start Date:** 4/15/2013
Demob Date: **Completion Date:**
CERCLIS ID: MIN000510764 **RCRIS ID:**
ERNS No.: **State Notification:** MDEQ
FPN#: **Reimbursable Account #:**

Incident Category

CERCLA Time-Critical Removal

Site Description and Location

The Federal-Mogul cleanup is located along the boundary of the former Federal-Mogul property addressed at 11031 Shoemaker Street, Detroit, Michigan 48213. The former Federal-Mogul property is 14-acres, abandoned, and shows a history of vandalism. Along its boarder to the west are 33 residential parcels which are the focus of the cleanup.

Region 5 considers this site to be a high-priority potential EJ area of concern.

Description of Threat and Assessments

Federal-Mogul Corporation owned 11031 Shoemaker Street from 1946 to 1971. Erwin Trucking and RPM Distributing owned the property in 1981. Sanborn maps show the facility was demolished in 1998.

In 2003, the Traverse Group conducted a Phase I Environmental Site Assessment for the city of Detroit Department of Environmental Affairs (DEA). The report concluded the site was operated as an industrial facility by Federal-Mogul Corporation, Bower Bearing Manufacturers, and Ernst Realty Company/Ernst Fuel & Supply Company from 1925 until the 1970s.

In 2006, 13 soil samples were collected upwind and downwind of 11031 Shoemaker Street for the Michigan DEQ Detroit Lead Assessment Project. Of the 13 samples collected, only 2 were found to be greater than 400 mg/kg of lead in soil; the average was 183 mg/kg. In addition, the city of Detroit DEA contracted Camp Dresser & McKee to perform a Phase II Environmental Site Assessment (ESA) on the 11031 Shoemaker Street property. The Phase II data showed analytical results for 63 lead samples, only 6 were found to be greater than 400 mg/kg and the average was 197 mg/kg.

The 2006 final report stated "...Because lead concentrations downwind and on-site were not indicative of smelting operations, no further action is recommended at the site related to lead concentrations above Residential/Commercial I Direct Contact Criteria."

In 2008, a Notice of Corrective Action was recorded with the Wayne County Register of Deeds (Document No. 2008.348947) for the former Federal-Mogul property indicating that a corrective action (MDEQ Reference No.: NCA-RRD-213-08-003) was completed by the Federal-Mogul Corporation. The corrective action addressed hazardous substances including polynuclear aromatics, trichloroethylene, and polychlorinated biphenyl that were released from an underground storage tank farm at the site. The corrective action removed all 10 USTs and approximately 4,240 tons of contaminated soil. The Notice of Corrective Action states that soil contamination remains present at levels on the site that do not allow for unrestricted use of the property within the area of the UST cleanup.

In 2011, ASTI Environmental for Shoemaker Industrial Park, an investment group, conducted another Phase II on the 11031 Shoemaker Street property. The assessment collected 41 soil borings, only 7 were found to be greater than 400 mg/kg and the average was 214 mg/kg of lead in soil.

In 2012, EPA Remedial collected samples and conducted x-ray fluorescence (XRF) screening at 10 residential homes along the western property line of 11031 Shoemaker Street. The sampling found lead levels in soil above the 400 mg/kg residential direct contact criteria in 9 of 10 yards; the average was 676 mg/kg.

2012 EPA Residential Samples MDEQ Direct Contact Criteria for Lead = 400 mg/kg Average Off-site Lead Results = 189 mg/kg		
Address	Analytical Sample	XRF Result
xxxx Fairview	304 mg/kg	316 mg/kg
xxxx Fairview	758 mg/kg	710 mg/kg
xxxx Fairview	1692 mg/kg	1485 mg/kg
xxxx Fairview	879 mg/kg	418 mg/kg
xxxx Fairview	786 mg/kg	764 mg/kg
xxxx Fairview	410 mg/kg	393 mg/kg

xxxx Fairview	1030 mg/kg	915 mg/kg
xxxx Fairview	758 mg/kg	686 mg/kg
xxxx Fairview	750 mg/kg	629 mg/kg
xxxx Fairview	416 mg/kg	340 mg/kg

Conclusion

While the Detroit Lead Assessment Project's aerial deposition study and the two on site studies do not indicate lead smelting or a wide spread off-site release, the site history and EPA's Remedial investigation indicate the lead contamination in residential yards directly abutting the property likely migrated there from Federal-Mogul operations through localized cross contamination, soil migration, or process exhaust.

2. Current Activities

2.1 Operations Section

Response Actions to Date

On April 15, EPA initiated a removal action to mitigate the threats posed by lead above 400 mg/kg in residential yards by removing and replacing soil from the residential yards.

Prior to the cleanup, EPA held two public meetings, canvassed the area multiple times, and hand delivered two factsheets.

During the first week of cleanup, EPA collected XRF readings across the street from the 33 parcels along the west side of Fairview Street. No lead readings above 400 mg/kg were found.

Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Currently Federal-Mogul is the only identified PRP for the site. Federal-Mogul entered bankruptcy under Chapter 11 on November 8, 2007.

2.1.4 Progress Metrics

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

2.2 Planning Section

Anticipated Activities and Next Steps

Site setup has been completed. The excavation was started on the northwest end of Fairview Street and will continue in a linear pattern until contaminated homes have been cleaned up.

Property Status

Total Parcels = 33

Access Granted = 30

No Access = 3

Sampled = 30

Parcels above 400 mg/kg = 18

Parcels below 400 mg/kg = 7

Parcels with samples pending = 5

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$550,000.00	\$49,000.00	\$501,000.00	91.09%
TAT/START	\$40,000.00	\$15,000.00	\$25,000.00	62.50%
Intramural Costs				
USEPA - Direct	\$50,000.00	\$5,000.00	\$45,000.00	90.00%
Total Site Costs				
	\$640,000.00	\$69,000.00	\$571,000.00	89.22%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

U.S. EPA (1)
 START - Weston Solutions Inc (1)
 ERRS - Lata-Kemron (2)
 - CMC (4)
 - Marine Pollution Control (MPC) (4)

5. Definition of Terms

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
 DEA - City of Detroit Department of Environmental Affairs
 EPA - United States Environmental Protection Agency
 ESA - Environmental Site Assessment
 MDEQ - Michigan Department of Environmental Quality
 PRP - Potential Responsible Party
 UST - Underground Storage Tank
 XRF - X-Ray Fluorescence

6. Additional sources of information**6.1 Internet location of additional information/report**

http://www.epaosc.org/site/site_profile.aspx?site_id=8195

6.2 Reporting Schedule**7. Situational Reference Materials**

No information available at this time.