

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Pickens Plating - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
Pickens Plating  
MIN000510460  
Albion, MI  
Latitude: 42.2521035 Longitude: -84.7757838

**To:** Jason El-Zein, U.S. EPA  
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Jon Bartlett, Calhoun County  
Kevin Markovich, City of Albion  
Michael Herman, City of Albion  
Joe Walczak, MDNRE  
Jeff Kelley, U.S. EPA

**From:** Jeff Lippert, OSC  
**Date:** 11/1/2010  
**Reporting Period:** 10/25/10 - 10/29/10

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	B5XE	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/2/2010
<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>	10/12/2010	<b>Start Date:</b>	10/12/2010

<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MIN000510460	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>	N/A	<b>Reimbursable Account #:</b>	N/A

### **1.1.1 Incident Category**

Time Critical Removal Action per request of the City of Albion and Calhoun County, Michigan.

### **1.1.2 Site Description**

The Site consists of a 4-acre parcel bordered by industrial properties to the south and west, wooded and open land to the north, agricultural land to the east, and residential properties to the northeast. The Site is the former location of Pickens Plating, an electroplating business specializing in zinc plating. The Site includes one main building with multiple additions.

#### **1.1.2.1 Location**

The Site is located at 1000 Industrial Boulevard in Albion, Calhoun County, Michigan, 49224, in a mixed residential/industrial/agricultural area. Coordinates for the Site are 42.2551 degrees north and -84.7753 degrees west.

#### **1.1.2.2 Description of Threat**

The building at the Site was found to contain uncontrolled hazardous wastes (containers labeled chromic acid, nitric acid, sodium hydroxide, hydrogen peroxide, and hydrofluoric acid). Numerous vats, drums, and small containers of various sizes were found opened and unlabeled both inside the buildings and around the grounds. U.S. EPA quantified containers on-site that could potentially contain over 100,000 gallons of uncontrolled and unidentified liquid wastes. Four waste liquid samples were collected yielding pH results that are characteristically hazardous or TCLP levels that are characteristically toxic. The site has over 40 open vats of plating chemicals that had pHs which are considered characteristically hazardous.

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

U.S. EPA conducted an assessment at the Site on June 4, 2010. The site assessment entailed the collection of four liquid samples and one solid sample. Both the solid and liquid samples were analyzed for pH. Corrosive substances in drums, containers and vats were sampled and returned with pHs as low as 0.8 standard units (su) and as high as 12.5 su. Both levels are considered characteristically hazardous. Numerous drums labeled "hydrofluoric acid" were also present in the building. These drums were not opened during the Site Assessment due to the extreme hazard they present for inhalation and skin absorption. Fumes from stainless steel drums labeled as "nitric acid" produced a pH of 0.0 su on field equipment.

## **2. Current Activities**

## **2.1 Operations Section**

### **2.1.1 Narrative**

On September 2, 2010 the Action Memo was approved to expend up to \$1,039,042 to conduct a time-critical removal action at the Pickens Plating Site. Corrosive substances in drums, containers and vats were sampled and returned with pHs as low as 0.8 standard units (su) and as high as 12.5 su. Both levels are considered characteristically hazardous. Numerous drums labeled "hydrofluoric acid" were also present in the building. These drums were not opened during the Site Assessment due to the extreme hazard they present for inhalation and skin adsorption. Fumes from stainless steel drums labeled as "nitric acid" produced a pH of 0.0 su on field equipment. The site has over 40 open vats of plating chemicals that had pHs which considered characteristically hazardous.

The floors of the building were in poor condition and showed numerous signs of chemical spills. Staining on the floor indicated years of waste accumulation from general operation and poor house keeping on-site. The building is unwatched and fairly secluded with no perimeter fencing to keep out prospective vandals and scavengers. Leaks in the roof in many locations will lead to premature corrosion of containers within the building, increasing the chance for a release of these substances. The rain water from the leaky roof also has the potential to enter open-top acid vats and react, causing an airborne vapor release.

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

On 10/25/2010, ERRS completed clearing space for a drum staging area by cutting RCRA empty drums and containers and placing the carcasses in a roll-off box for disposal. ERRS also removed any metal debris that was inhibiting clear access to drums, vats, and other containers. Metal debris was placed in a separate roll-off box for recycling. ERRS sampling crew continued sampling vats and drums. ERRS chemist began haz cating solids and liquids from vats and drums.

On 10/26/2010, ERRS continued cutting RCRA empty drums and other non-metal debris and placing it in a roll-off box for disposal at C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling. One load of RCRA empty drums and debris was hauled off site to be disposed of at C&C Landfill in Marshall, Michigan. ERRS sampling crew continued sampling vats, drums, and other containers of waste. ERRS chemist continued haz cating small samples collected by the sampling crew.

On 10/27/2010, ERRS sampling team continued sampling drum and vat contents. Samples were haz catted by the ERRS chemist. Drums 130 and 135 had hits for cyanide. These two drums were staged away from other drums containing corrosives. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items in a roll-off box for disposal at a C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling.

On 10/28/2010, ERRS sampling team continued container sampling. ERRS chemist continued haz cutting samples collected by the sampling team. ERRS also continued disposal of RCRA empty drums and recycling of scrap metal. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items in a roll-off box for disposal at a C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling. Kevin Markovich from the Albion Department of Public Service stopped by the Site for an update on work

On 10/29/2010, ERRS sampling team completed container sampling. ERRS chemist completed haz cutting samples collected by the sampling team. ERRS also continued disposal RCRA empty drums and scrap metal. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items in a roll-off box for disposal at a C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling.

Throughout the week, USCG performed health and safety oversight and conducted work zone air monitoring with a MultiRae. No readings elevated above background were reported and no safety incidents were noted.

USCG also monitored the air around the perimeter of the facility with AreaRaes. HCN sensors installed in the Area Raes were operated while ERRS was in the work zone. No readings elevated above background were recorded. U.S. EPA assumed documentation duties from START and USCG assumed file keeping duties.

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

The title search report and information obtained from Calhoun County indicate that the current owner of the Site is the Calhoun County Treasurer's Office. U.S. EPA will obtain an appraisal of the property to ascertain its value. Depending on the value of the property (and whether Calhoun County has Bona Fide Prospective Purchaser (BFPP) status under CERCLA), U.S. EPA may place a lien on the property, pursuant to CERCLA sections 107(1) or 107(r). A 104(e) information request may also be sent to a representative of the dissolved corporation, to discover whether assets were transferred from the corporation within the clawback period established by relevant Michigan law. If substantial assets were transferred from the corporation within the clawback period, U.S. EPA will attempt to capture those assets to offset the costs of the response action.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
RCRA Empty Containers and General Debris	Solid	30 CY	0057		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0059		C&C Landfill

RCRA Empty Containers and General Debris	Solid	30 CY	0058		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0060		C&C Landfill
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

- a) Continue RCRA empty container disposal;
- b) Continue debris removal;
- c) Begin bulking compatible container contents;
- d) Conduct soil sampling in distressed vegetation area on the south side of the building;
- e) Conduct floor sampling within the building to determine need for building decon;
- f) Conduct sediment sampling in the pond to the east of the building;
- g) Distribute fact sheet to local community;

#### 2.2.1.1 Planned Response Activities

- a) Inventory and perform hazard characterization, in compliance with a site-specific QA/QC Plan, on all substances contained in containers, drums, and vats;
- b) Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- c) Dismantle and/or decontaminate contaminated structures as necessary;
- d) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR §300.440).
- e) Decontaminate or remove highly contaminated facility flooring.

f) Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

**2.2.1.2 Next Steps**

N/A

**2.2.2 Issues**

Wildlife that has inhabited portions of the Site building.

**2.3 Logistics Section**

Not applicable

**2.4 Finance Section**

**2.4.1 Narrative**

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**Estimated Costs \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$400,000.00	\$95,135.56	\$304,864.44	76.22%
USCG	\$16,500.00	\$8,829.36	\$7,670.64	46.49%
TAT/START	\$25,000.00	\$16,332.94	\$8,667.06	34.67%
<b>Intramural Costs</b>				
USEPA - Direct	\$83,600.00	\$23,106.66	\$60,493.34	72.36%
USEPA - InDirect	\$20,000.00	\$14,501.73	\$5,498.27	27.49%

<b>Total Site Costs</b>	\$545,100.00	\$157,906.25	\$387,193.75	71.03%
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\* 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 Safety Officer**

U.S. EPA, Jeff Lippert, OSC

## **2.6 Liaison Officer**

Not applicable

## **2.7 Information Officer**

### **2.7.1 Public Information Officer**

Jayna Legg

### **2.7.2 Community Involvement Coordinator**

Janet Pope

## **3. Participating Entities**

### **3.1 Unified Command**

Not Applicable.

### **3.2 Cooperating and Assisting Agencies**

City of Albion Public Services  
City of Albion Economic Development Corporation  
Calhoun County Treasurer's Office  
Michigan Department of Natural Resources and Environment  
U.S. Coast Guard  
U.S. Environmental Protection Agency

## **4. Personnel On Site**

Jeff Lippert, U.S. EPA  
John Rogers, U.S. EPA  
Darrel Boyles, U.S. Coast Guard  
Andy Johnson, U.S. Coast Guard  
Jay Rauh, Weston START  
Eric Bowman, EQM

Robert Bowman, EQM  
Anne Bowling, EQM  
Steve Sturgeon, EQM  
Ellis Thigpen, Inland Waters of Ohio  
Joseph Sherbert, Inland Waters of Ohio  
Corey Evans, Inland Waters of Ohio  
Antwayne Brown, Inland Waters of Ohio

## **5. Definition of Terms**

U.S. EPA - United States Environmental Protection Agency  
USCG - United States Coast Guard  
START - Superfund Technical Assessment and Response Team  
ERRS - Emergency and Rapid Response Service  
NCP - National Contingency Plan  
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act  
RCRA - Resource Conservation and Recovery Act

## **6. Additional sources of information**

### **6.1 Internet location of additional information/reports**

None.

### **6.2 Reporting Schedule**

Polreps will be issued weekly.

## **7. Situational Reference Materials**

NCP  
CERCLA  
RCRA