

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Pickens Plating
MIN000510460
Albion, MI
Latitude: 42.2521035 Longitude: -84.7757838

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From: Jeff Lippert, OSC
Date: 11/8/2010
Reporting Period: 11/1/2010 - 11/5/2010

1. Introduction

1.1 Background

Site Number:	B5XE	Contract Number:	
D.O. Number:		Action Memo Date:	9/2/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/12/2010	Start Date:	10/12/2010

Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510460	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:	N/A	Reimbursable Account #:	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 11/1/2010, 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. ERRS began cutting apart an above ground storage tank in an out-building south of the main building. START sampled the soil below dead vegetation on the south side of the Site. START also collected sediment samples from the pond to the east and samples from the floor within the building.

On 11/2/2010, ERRS began bulking acids into acid vats on the southwest plating line to prepare for disposal. ERRS cut RCRA-empty acid drums in half and placed them 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. ERRS completed cutting apart the above ground storage tank in the out-building.

On 11/3/2010, ERRS completed bulking acids into acid vats on the southwest plating line. ERRS began bulking base liquids into vats and totes containing base liquids. 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. A reporter from the Albion College Newspaper, the Pleiad visited the Site and interviewed OSC Lippert for a news article.

On 11/4/2010, ERRS completed bulking base liquids and began staging containers of neutral liquids and oxidizers for bulking on 11/5/2010. ERRS began bulking solids into lined roll-off boxes. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items 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 at C&C Landfill in Marshall, Michigan.

On 11/5/2010, Sample results returned from the lab for the soil, sediment, and floor samples that were collected on 11/1/2010. All results were non-hazardous. ERRS continued bulking solids

into lined roll-off boxes. ERRS began bulking neutral liquids into vats. 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. USCG quantified and marked mercury switches in the building.

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 used to monitor for cyanide while ERRS was in the work zone. No readings elevated above background were recorded.

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
RCRA Empty Containers and General Debris	Solid	30 CY	0061		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) Complete bulking compatible container contents;
- d) Sample bulked waste for disposal;
- d) 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 *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$400,000.00	\$121,368.88	\$278,631.12	69.66%
USCG	\$16,500.00	\$12,376.49	\$4,123.51	24.99%
TAT/START	\$25,000.00	\$17,759.52	\$7,240.48	28.96%
Intramural Costs				
USEPA - Direct	\$83,600.00	\$23,378.26	\$60,221.74	72.04%
USEPA - InDirect	\$20,000.00	\$14,672.18	\$5,327.82	26.64%
Total Site Costs				
	\$545,100.00	\$189,555.33	\$355,544.67	65.23%

* 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