

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #9**
Time Critical Removal Action Continues at Pickens Plating
Pickens Plating
MIN000510460
Albion, MI
Latitude: 42.2521035 Longitude: -84.7757838

To: Jason El-Zein, U.S. EPA
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From: Jeff Lippert, OSC

Date: 1/31/2011

Reporting Period: 1/24/11 - 1/29/11

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 1/24/2011, ERRS resumed decommissioning the plating vats to render them useless. ERRS continued removing hazardous solids from trenches below plating lines. ERRS completed content removal of non-hazardous material from nickel plating line vats. ERRS continued dismantling the waste water treatment system. Hazardous solids were placed in a lined roll-off box for disposal EQ in Detroit, MI. Non-hazardous solids from other areas of the Site were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan. Two roll-off boxes of non-hazardous solids were transported to C&C Landfill in Marshall, Michigan for disposal. Mercury switches and thermometer were shipped off-site for disposal at WM-Mercury Waste.

On 1/25/2011, ERRS continued decommissioning the plating vats to render them useless. ERRS continued removing hazardous solids from trenches below plating lines. ERRS continued dismantling the waste water treatment system. Hazardous solids were placed in a lined roll-off box for disposal at EQ Detroit, Inc in Detroit, MI. Non-hazardous solids from other areas of the Site were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan.

On 1/26/2011, ERRS continued decommissioning the plating vats to render them useless. ERRS continued removing hazardous solids from trenches below plating lines. ERRS completed dismantling the waste water treatment system. Hazardous solids were placed in a lined roll-off box for disposal at EQ Detroit, Inc in Detroit, MI. Non-hazardous solids from other areas of the Site were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan.

On 1/27/2011, ERRS continued decommissioning the plating vats to render them useless. ERRS continued removing hazardous solids from trenches below plating lines. Hazardous solids were placed in a lined roll-off box for disposal. Non-hazardous solids from other areas of the Site were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan. The cyanide solids and flammable liquid waste streams were transported off-site for disposal at EQ Detroit, Inc in Detroit, MI. One roll-off box of non-hazardous solids and one roll-off box of RCRA empty containers were shipped off-site for disposal at C&C Landfill in Marshall, Michigan.

On 1/28/2011, ERRS continued decommissioning the plating vats to render them useless. ERRS continued removing hazardous solids from trenches below plating lines. Hazardous solids were placed in a lined roll-off box for disposal at EQ Detroit, Inc in Detroit, MI. Non-hazardous solids from other areas of the Site were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan.

On 1/29/2011, ERRS continued decommissioning the plating vats to render them useless. ERRS completed removing hazardous solids from trenches below plating lines. Non-hazardous solids were placed in a roll-off box for disposal at C&C Landfill in Marshall, Michigan.

Throughout the week, USCG Atlantic Strike Team performed health and safety oversight and conducted work zone air monitoring with a MultiRae and DataRAM. No readings elevated above

background were reported and no safety incidents were noted.

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
RCRA Empty Containers and General Debris	Solid	30 CY	0068		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0069		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	R12711-1	Disposed	C&C Landfill
Non-Hazardous Solids	Solid	20 CY	N/A		C&C Landfill
Non-Hazardous					

Solids	Solid	20 CY	N/A		C&C Landfill
Non-Hazardous Solids	Solid	20 CY	N/A		C&C Landfill
Non-Hazardous Solids	Solid	20 CY	N/A		C&C Landfill
Non-Hazardous Solids	Solid	20 CY	N/A		C&C Landfill
Non-Hazardous Solids	Solid	20 CY	12411-1		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	
Scrap Metal	Solid	40 CY	N/A	Recycled	
Acid Liquid	Liquid	5,618 Gal.	002775510 FLE		Vickery Environmental
Base-Neutral Liquid	Liquid	9,600 Gal.	007798443 JJK	Treated	EQ Detroit, Inc.
Base-Neutral Liquid	Liquid	5,500 Gal.	007798440 JJK	Treated	EQ Detroit, Inc.
Hydrofluoric Acid Waste	Liquid	55 Gal.	007743836 JJK	Disposed	Petro-Chem Processing Grp.
Nitric Acid Waste	Liquid	237 lbs	007743836 JJK	Disposed	Petro-Chem Processing Grp.
Waste Cyanide	Solid	85 Gal.	007844391 JJK	Disposed	Dynecol, Inc.
Waste Flammable Liquid	Liquid	110 Gal	007844391 JJK	Disposed	Dynecol, Inc.

2.2 Planning Section

2.2.1 Anticipated Activities

- a) Transport and dispose of hazardous solids;
- b) Transport and dispose of non-hazardous solids;
- c) Continue dismantling the vats and recycling metal;
- d) Develop punch-list of items to be completed before demobilization;

- e) Final walk-through with City of Albion, Calhoun County, and State of Michigan;
- f) Demobilize from Site.

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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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.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$550,000.00	\$480,540.01	\$69,459.99	12.63%
USCG	\$31,500.00	\$24,773.30	\$6,726.70	21.35%
TAT/START	\$25,000.00	\$22,196.50	\$2,803.50	11.21%
Intramural Costs				
USEPA - Direct	\$83,600.00	\$34,213.77	\$49,386.23	59.07%
USEPA - InDirect	\$20,000.00	\$150,156.09	(\$130,156.09)	-650.78%
Total Site Costs				
	\$710,100.00	\$711,879.67	(\$1,779.67)	-0.25%

* 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