



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 216
GROSSE ILE, MI 48138-1697

MEMORANDUM

AUG 20 2003

SUBJECT: **ACTION MEMORANDUM** - Request for a Time-Critical Removal Action at the Carter Color Coat Site, Detroit, Wayne County, Michigan (Site ID #B5LC)

FROM: Jeffrey Kimble, On-Scene Coordinator
Emergency Response Branch 1 - Section 1

Jeff Kimble 8/17/08

TO: Richard C. Karl, Director
Superfund Division

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

Jeff Kimble JHE 8/17/08



I. PURPOSE

The purpose of this Memorandum is to request and document your approval to expend up to \$581,286 in order to conduct a time-critical removal action to eliminate an imminent and substantial threat to public health, welfare, and the environment at the former Carter Color Coat (CCC) Site. The presence of hazardous substance as defined by 40 Code of Federal Regulations, Part 261, Subpart C, has been documented by the Michigan Department of Environmental Quality (MDEQ). In addition, asbestos-containing material (ACM) in the building rubble piles was also documented by the MDEQ. U.S. EPA performed a Site assessment on the property and identified material contaminated with polychlorinated biphenyls and observed other wastes at Site. The proposed removal action is necessary in order to mitigate the immediate threat to public health, welfare, and the environment posed by the hazardous materials present at the CCC Site. The CCC Site is located at 6051 Hastings Street in Detroit, Wayne County, Michigan.

The response action proposed herein will mitigate Site conditions by properly removing and off-site disposal of the following: drums and other containers with hazardous material; hazardous material inside tanks and sumps; PCB-contaminated solid waste and wood block flooring; and solid debris contaminated with ACM. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC 9604(a)(1).

Additional Site activities will include perimeter and work zone air monitoring, demolition and disposal of contaminated flooring and solid material, and dismantling of tanks and other structures. The fact that hazardous material is present in an uncontrolled area in the center of the city requires that this removal be classified as a time-critical removal action. The project will require an estimated 45 on-site working days to complete.

The CCC Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # MID980586645

A. Physical Location and Description

The CCC Site is located at 6051 Hastings Street, Detroit, Wayne County, Michigan, 48211. The CCC Site encompasses approximately 240,000 square feet and has one warehouse building that covers approximately half the Site (footprint of 120,000 square feet). The building is six-stories high and each floor is divided into several large rooms. A main office area is present on the first floor of the building on the Hastings Street side.

The Site is bordered by Hastings Street to the northeast, Harper Street to the southeast, St. Antoine Street to the southwest, and Piquette Street to the northwest. Other industrial properties surround the Site on all 4 sides.

The geographical coordinates for the Site are: latitude 42°22.184' North and longitude 83° 03.598' West. The Site is located in a mixed residential and industrial neighborhood with residential properties located approximately one-half mile to the southwest of the Site.

B. Site Background

The building was originally constructed and operated by General Motors Corporation (GMC), Fisher Body Division between 1919 and 1984. GMC generated halogenated and non-halogenated spent solvents, spent plating wastes, ignitable and corrosive wastes from its operations at this location. Between 1985 and 1990, the facility was owned and operated by Cameo Color Coat, Inc., after which time the property ownership was transferred to Carter Color Coat. Carter Color Coat operated as a conditionally exempt small quantity generator of hazardous wastes at this facility. Carter Coat declared bankruptcy and abandoned the facility in 1993. GMC conducted a removal action at the property in the early 1990s, removing paints and other hazardous materials from the building.

The MDEQ and their contractor conducted a Site assessment of the property in April and June of 2004, including an asbestos survey. MDEQ found hazardous waste in

drums and containers and documented PCBs and asbestos present, and proceeded to obtain bids for the clean-up. Due to funding issues, the State of Michigan is no longer able to fund the clean-up at the property and therefore requested assistance from the U.S. EPA in August of 2007.

U.S. EPA conducted a Site assessment at the property on December 11, 2007. The assessment revealed that some of the wood block flooring of the building was contaminated with PCBs, and PCBs were detected in a pile of waste located outside the building. Portions of drums identified in the earlier MDEQ Site assessment were observed protruding out of piles of construction debris, but it was not possible to access the drums to take samples of their content. Moreover, U.S. EPA confirmed the presence of suspected hazardous waste inside tanks and sumps at the facility, also identified by MDEQ, but it was unable to take samples as the contents of the tanks and sumps was frozen solid.

According to the Region V Superfund Environmental Justice Analysis, in the state of Michigan the average low income percentage is 29% or greater and the average minority percentage is 21% or greater. To meet the Environmental Justice (EJ) criteria, the area within one mile of the Site must have a population that is twice the state low income percentage and/or twice the state minority percentage. At the CCC Site, the low income percentage is 89% and the minority percentage is 66%. Therefore, this Site meets the Region's EJ criteria based on demographics as identified in Region V's Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the CCC Site present an imminent and substantial threat to the public health, or welfare, and the environment, and meet the criteria for a time-critical removal action provided for in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended. These factors include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Evidence of trespassing has been documented on the Site. The evidence supporting this conclusion consists of the following: there are breaches in the fence surrounding the Site and boards have been pulled off of doors to the building; graffiti is prevalent throughout the Site; discarded food material has been found at the Site; a current community center identification has been found at the Site; and, in the last 6 months, at least one fire was started at the Site.

Although the City of Detroit repairs the breaches in the Site fence and replaces the boards pulled off doors, trespassers continue to break into the Site.

PCB contamination is present on the wood block flooring of the facility as evidenced by the wipe samples collected during the December 11, 2007, assessment by U.S. EPA. PCBs are regulated as toxic waste under the Toxic Substances Control Act and as found in the PCB regulations at 40 CFR 761. This contamination could migrate off Site either due to weather or trespass. Analysis results for PCBs vary greatly on the wood block flooring and an extensive assessment would be required to completely delineate the contamination. The OSC proposes to remove all the wood block flooring which will eliminate the need for further sampling and costs associated with that action. Asbestos has been documented in loose piles of material and has been moved throughout the Site and poses the threat of off-site release. Given the prior generation of hazardous waste at the Site, and the conditions observed both by MDEQ and U.S. EPA during their Site assessments, it can be presumed that among the debris piles on Site are crushed drums of hazardous waste. This material poses a direct threat to any individuals accessing the Site and will continue to be a risk until stabilized.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release.

Based on the analytical results provided by MDEQ, hazardous substances are present on-site in 55-gallon drums, ASTs, sumps, and USTs. The drums have been buried on-site by unknown persons and the drum conditions are unknown. The hazardous material that was in these containers may have been released to the ground and could migrate from the Site with heavy rains. The AST and sumps are open and exposed to the elements. The condition of the UST is unknown at this time. These vessels contain Resource Conservation and Recovery Act (RCRA) hazardous wastes as defined by the following waste codes: D001 (characteristic of ignitability); D002 (characteristic of corrosivity); and D007 and D008 (characteristic of toxicity) and are present on-site in an uncontrolled manner and pose current and continued risk to anyone accessing the property.

The availability of other appropriate federal or state response mechanisms to respond to the release;

In a letter dated August 16, 2007, MDEQ requested assistance from the U.S. EPA in conducting an investigation and a time-critical removal action at the CCC Site. Neither MDEQ nor any other local government has adequate finances or resources to respond to a time-critical removal action of this magnitude.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the hazardous substances on the Site, and the potential exposure pathways described in Sections II and III above, actual or threatened

releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes that the following actions be taken to mitigate threats posed by the presence of hazardous substances at the Site:

- 1) Develop and implement a Site Health and Safety Plan.
- 2) Remove and dispose of PCB-contaminated wood-block floors of the facility,
- 3) Unearth and characterize crushed drums suspected of containing hazardous waste and prepare the associated debris for disposal,
- 4) Transport and dispose of all hazardous material, or contaminants at an EPA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440);
- 5) Render any large storage tanks unusable at the Site;
- 6) Take any necessary response action to address any release or threatened release of a hazardous substance, pollutant, or contaminant that the U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP. Elimination of all surface threats is, however, expected to minimize the need for post-removal Site control.

The removal action will be conducted in a manner to obtain and preserve information and evidence which may be of use in a civil or criminal investigation of the Site. Actions will also be coordinated with the MDEQ to facilitate an orderly transition to their planned

The removal activities described in this memorandum will require an estimated 45 on-site working days to complete.

A detailed cleanup contractor cost estimate is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs:

Total Cleanup Contractor Costs	\$458,905
(This cost category includes estimates for ERRS, and subcontractors. Includes a 15% contingency.)	

Other Extramural Costs Not Funded from the Regional Allowance:

Total START, including multiplier costs	<u>\$ 60,000</u>
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Subtotal, Extramural Costs	\$518,905
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Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>\$ 103,781</u>
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TOTAL, REMOVAL ACTION PROJECT CEILING	\$ 622,686
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The response actions described in this memorandum directly address the actual or threatened release at the CCC Site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. On April 22, 2008, a letter was sent to Ms. Patricia Thornton of MDEQ requesting that the state identify any applicable state ARARs.

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances documented on Site, and the potential exposure pathways to nearby populations described in Sections II and

III above, actual or threatened release of hazardous substances from the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to present an imminent and substantial endangerment to public health, welfare, or the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$906,943.¹

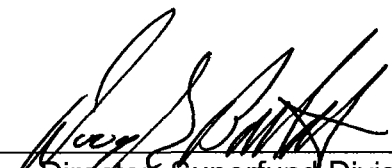
$$(\$622,686 + \$25,000) + (49.59\% \times \$647,686) = \$968,873$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Carter Color Coat, Wayne County, Michigan, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision was based upon the administrative record for the Site. Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal and I recommend your approval of the proposed removal action. The total removal action project ceiling if approved will be \$622,686. Of this, an estimated \$562,686 comes from the Regional removal allowance. You may indicate your decision by signing below:

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

APPROVE:

for 
Director, Superfund Division

DATE:

8/20/08

DISAPPROVE:

Director, Superfund Division

DATE: _____

Enforcement Addendum

- Attachments:
1. Detailed Cleanup Contractor Cost Estimate
 2. Administrative Record Index
 3. Independent Government Cost Estimate
 4. Region V EJ Analysis

cc: D. Chung, U.S. EPA, 5203-G
M. Chezik, U.S. DOI, **w/o Enf. Addendum**
Stephen E. Chester, Director, MDEQ, w/o Enf. Addendum
Michael Cox, Michigan Attorney General, w/o Enf. Addendum
P.O. Box 30212
Lansing, MI 48909
Patricia Thornton, MDEQ, w/o Enf. Addendum
27700 Donald Court
Warren, MI 48092

bcc: M. Colvin, SRT-5J, **w/o Enf. Addendum**
A. Marouf, S-6J
M. Durno, ME-W
W. Messenger, SE-5J
M. Johnson, ATSD-4J, **w/o Enf. Addendum**
Public Affairs, P-19J, **w/o Enf. Addendum**
V. Narsete, SE-5J, **w/o Enf. Addendum**
S. Wolfe, ME-W
J. Kimble, SE-GI
R. Wagner, C-14J
R. Woodfork, SE-5J
ERB Read File (C. Beck), SE-5J
ERB Delivery Order File (C. Norman), SE-5J
ERB Site File (M. Bedford, SF Central File Room), SMR-7J
Contracting Officer, MCC-10J, **w/o Enf. Addendum**

**ENFORCEMENT ADDENDUM
CARTER COLOR COAT SITE
DETROIT, WAYNE COUNTY, MICHIGAN
JULY 2008**

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

The Carter Color Coat Site is located at 6051 Hastings Street in Detroit, Michigan. A large six-story concrete and steel frame building covers approximately one-half of the property. The other half of the property was primarily used for parking. The property is fenced, but not secure. The site is located in a mixed residential and industrial neighborhood with residential properties located approximately one-half mile to the southwest of the Site.

The building was originally constructed and operated by General Motors Corporation (GMC), Fisher Body Division between 1919 and 1984. GMC conducted a removal action at the property in the early 1990s, removing paints and other hazardous materials from the building.

Between 1985 and 1990, the facility was owned and operated by Cameo Color Coat, Inc., after which time the property ownership was transferred to Carter Color Coat. Carter Color Coat operated as a conditionally exempt small quantity generator of hazardous wastes at this facility. Carter Coat declared bankruptcy and abandoned the facility in 1993.

The Michigan Department of Environmental Quality (MDEQ) and their contractor conducted a Site assessment of the property in April and June of 2004, and proceeded to obtain bids for the clean-up. Due to funding issues, the State of Michigan is no longer able to fund the clean-up at the property and therefore requested assistance from the U.S. EPA in August of 2007.

A Site assessment was conducted on December 11, 2007, U.S. EPA On-Scene Coordinators (OSCs) Jeffrey Kimble and Stephen Wolfe with the representatives from the MDEQ.

ENFORCEMENT RECOMMENDATION: U.S. EPA will do a Time-Critical Removal Action. U.S. EPA will also investigate the PRP's ability to pay and information received from MDEQ. Based on the information reviewed, EPA may issue an Administrative Order of Consent. If the PRP doesn't comply with the AOC, U.S. EPA will seek cost recovery.

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CARTER COLOR COAT SITE
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AUGUST 2008**

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ATTACHMENT 1

**DETAILED CLEANUP CONTRACTOR ESTIMATE
CARTER COLOR COAT SITE
DETROIT, WAYNE COUNTY, MICHIGAN
JULY 2008**

The estimated cleanup contractor costs necessary to complete the removal action at the Carter Color Coat Site are as follows:

Personnel & Equipment	\$ 219,968
Materials & Misc	\$ 84,080
Transportation and Disposal	<u>\$ 95,000</u>
<u>Contingency (15%)</u>	<u>\$ 55,357</u>
TOTAL	\$ 458,905

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ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR CARTER COLOR COAT SITE DETROIT, WAYNE COUNTY, MICHIGAN

ORIGINAL
JULY 16, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	08/06/07	Oyinsan, O., MDEQ	El-Zein, J., U.S. EPA	Letter re: MDEQ's Request that U.S. EPA Assist with a Removal Action at the Carter Color Coat Site w/Attachments	
2	03/27/08	Wolfe, S., TN&A	Kimble, J., U.S. EPA	Site Assessment Report for the Carter Color Coat Site	18
3	04/22/08	Kimble, J., U.S. EPA	Thornton, P., MDEQ	Letter re: U.S. EPA's Re- quest that MDEQ Identify any ARARs for the Carter Color Coat Site	1
4	00/00/00	Kimble, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Re- quest for a Time-Critical Removal Action at the Carter Color Coat Site (PENDING)	

ATTACHMENT 3

CARTER COLOR COAT SITE INDEPENDENT GOVERNMENT COST ESTIMATE DETROIT, WAYNE COUNTY, MICHIGAN JULY 2008

Personnel

1 Response Manager @ \$65/hr x 10 hrs/day x 45 days = \$29,250
1 FCA @ avg. \$46/hour x 45 days x 10 hrs/day = \$20,700
2 Operator @ 65/hr x 10 hrs/day x 45 days = \$58,500
2 Cleanup Techs. @ (\$40/hr x 10 hrs/day x 45 days) = \$36,000
1 T&D Coordinator @ \$55/hr x 100 hrs = \$5,500
1 Health & Safety @ \$55/hr x 20 hrs = \$1,100

Personnel Subtotal \$151,050

Equipment

1 Excavator w/ Sheers Attach. @ \$510/day x 5 days = \$2,550
1 Excavator w/ Grapppler Attach. @ \$510/day x 45 days = \$22,950
1 Excavator @ \$583/day x 21 days = \$12,243
1 Front-end Loader @ \$425/day x 21 days = \$8,925
1 Office Trailer @ \$500/month x 1 months = \$500
1 50kw Generator @ \$110/day x 45 days = \$4,950
4 Pick-up Trucks @ \$60/day x 45 days = \$10,800
Mobe & Demobe Equipment = \$6,000

Equipment Subtotal \$68,918

Misc

Electrician = \$1,000
Phone/Fax Service = \$1,000
2-Porta-John = \$500
Fuel (Equipment) = \$5,000
Supplies/Material = \$5,000
Site Security = \$30,000
Per diem/lodging for 6 man crew @ \$154/day x 45 days X 6 = \$41,580

Misc. Subtotal \$84,080

Transportation & Disposal

100 crushed drums @ \$500/drum = \$50,000
500 tons of non-haz (ACM-contaminated) debris x \$25/tons = \$12,500
20 yards of PCB-contaminated soils/concrete = \$2,500
2,000 tons PCB-contaminated wood block X \$15 ton = \$30,000

T&D Subtotal \$95,000

TOTAL ERRS = \$399,048

ERRS with 15% Contingency =\$458,905

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ATTACHMENT 4

**CARTER COLOR COAT SITE
DETROIT, WAYNE COUNTY, MICHIGAN
AUGUST 2008**

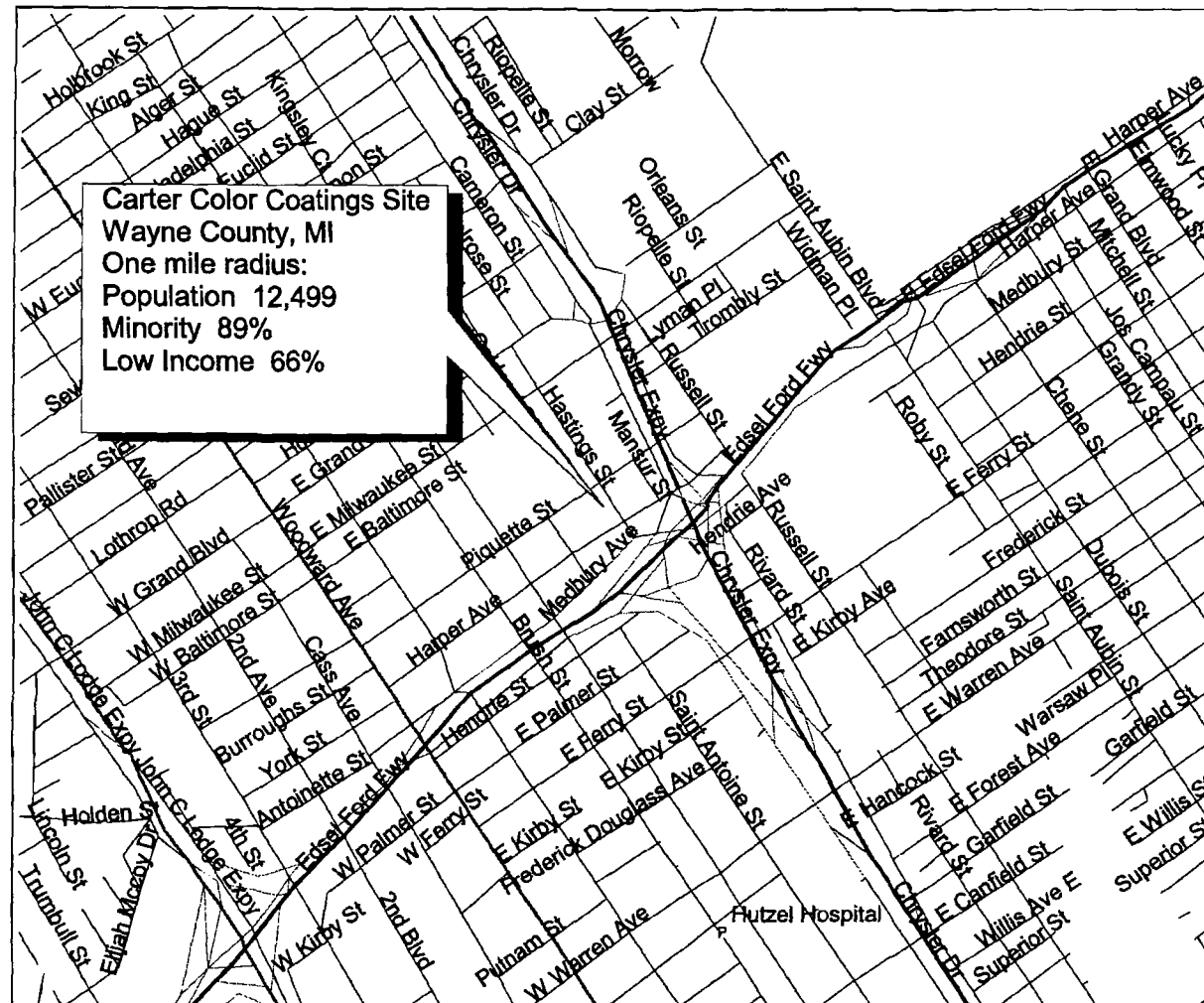
ATTACHMENT 4

**CARTER COLOR COAT SITE
DETROIT, WAYNE COUNTY, MICHIGAN
JULY 2008**

Region 5 Superfund EJ Analysis

Carter Color Coat Site

Detroit, MI



0 0.5 1 1.5 2 Miles

State of Michigan averages:
Minority: 21%
Low Income: 29%

U.S. EPA Region 5
Environmental Justice Case Criteria
for State of Michigan

Minority: 42% or greater

Low Income: 58% or greater



Date of Map: 2/22/08

Source of Map: Census 2000 Database/
ArcView 3.0

**REMOVAL PROGRAM
ACTION MEMORANDUM
ROUTING AND CONCURRENCE SLIP**

Carter Color Coat Site, Detroit, Wayne County, Michigan (Site ID #B5LC)

- 1) **ON-SCENE COORDINATOR (Jeff Kimble) (MC SE-GI)**
Signature *Jeff Kimble* Date: 7/10/08
(Prepares Action Memo package and signoff/concurrence sheet. Assures that Enforcement Confidential Addendum from the Enforcement Specialist is included; the Administrative Record (AR) Documents are available and the draft AR Index is included)
- 2) **ADMINISTRATIVE RECORDS COORDINATOR (MC SMR-7J)**
Signature *J. Pfundheller* Date: 7/14/08
(Jan Pfundheller. Assures that the AR is complete and the "Official AR Index is included, 1 - day turnaround)
- 3) **SECRETARY, RS Oil, II, III (Deidra Gray) (MC SE-5-J)** *received*
Signature *Deidra Gray* Date: REUL 14 2008
(Log into section's tracking system and forward package to ORC attorney) The Oil Section Secretary tracks Action Memos for RS1 and Oil.
- 4) **OFFICE OF REGIONAL COUNSEL (C-14J)**
STAFF ATTORNEY (R. Wagner)
Signature *R. Wagner* Date: 8/8/08 *w/changes*
ORC SUPERVISOR
Signature *Dorinda Lee* Date: 8.11.08
(3-day turnaround on this document per the ORC-WMD Memorandum of Understanding)
- 5) **CHIEF, RS1 (Mark Durno)(MC ME-W)**
Signature *Mark Durno for MD* Date: 7-10-08 (3-day turnaround)
- 6) **CHIEF, ERB 1 (Jason H. El-Zein)(MC SE-5J)**
Signature *Ch El Zein For JHE* Date: 8/15/08 (3-day turnaround)
- 7) **ERB1 BRANCH SECRETARY LOG-OUT (Cynthia Beck) (MC SE-5J)**
Signature *Cynthia Beck* Date: 8/19/08
(1-day turnaround) Contact Records Center for pick-up if Branch Chief is the final Approv. Official.
- 8) **DIRECTOR, SUPERFUND DIVISION (Richard C. Karl) (MC S-6J)**
Signature *R. C. Karl* Date: 8/20/08
- 9) **RECORDS CENTER SDMS CONTRACTOR (MC SMR-7J)**
Signature _____ Date: _____
(Jan Pfundheller/SDMS: Creates PDF copies of full and redacted version of Action Memo with Routing Slip, posts in SDMS, and e-mails both versions with Routing Slip to applicable On-Scene Coordinator, Branch Secretary (for ERB Read File), Section Secretary and Section Chief, 3 - day turnaround)

FINAL PROCESSING AND DISTRIBUTION: (Records Center files Original Action Memo and this sheet in the Rec Cntr Site File. Applicable Section Secretary emails PDF copies of full or redacted Action Memo according to listed cc and bcc recipients. OSC posts redacted Action Memo on OSC Homepage) 2/2/07