Kelly Thomas
Environmental Scientist

September 2, 2015

Mr. Jeffrey Kimble
On-Scene Coordinator
U.S. Environmental Protection Agency Region 5
9311 Groh Road
Grosse Ile, MI 48138

Subject: **Emergency Contingency Plan – Michner Plating Mechanic Street Site**
EPA Contract No. EP-S5-13-01
Technical Direction Document No. S05-0001-1508-202
Document Tracking No. 0315

Dear Mr. Kimble:

Tetra Tech Inc. (Tetra Tech) is submitting the Emergency Contingency Plan for the Michner Plating Mechanic Street Site. This plan summarizes emergency contingency protocols to be used during removal activities. If you have any questions regarding this plan, please call me at (313) 574-3176.

Sincerely,

Kelly Thomas
Environmental Scientist

Enclosure
cc: Sam Chummar, EPA Project Officer (letter only)
Kevin Scott, Tetra Tech Program Manager
TDD File

Tetra Tech, Inc.
25213 Dequindre Road, Madison Heights, MI 48071
Tel 248.721.8001 | Fax 248.399.0021
www.tetratech.com

EMERGENCY CONTINGENCY PLAN
MICHNER PLATING MECHANIC STREET SITE
JACKSON, JACKSON COUNTY, MICHIGAN

Prepared for

U.S. Environmental Protection Agency
Emergency Response Branch
Region 5
9311 Groh Road
Grosse Ile, MI 48138

Submitted by

Tetra Tech Inc.
25213 Dequindre Road
Madison Heights, MI 48071

EPA Contract No. EP-S5-13-01

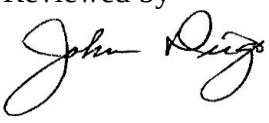
Technical Direction Document No. S05-0001-1508-202
Document Tracking No. 0315

September 16, 2015

Prepared by

Kelly Thomas
Environmental Scientist

Reviewed by



John Dirgo
START QC Reviewer

CONTENTS

Appendix

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (USEPA) has contracted Tetra Tech Inc. (Tetra Tech), under the Superfund Technical Assessment and Response Team (START) Contract EP-S5-13-01, Technical Direction Document (TDD) No. S05-0001-1508-202, to perform removal action support at the Michner Plating Mechanic Street Site in Jackson, Jackson County, Michigan. As part of removal action support, Tetra Tech START has prepared this emergency contingency plan for use during the removal action.

The emergency contingency plan outlines emergency contingency protocols. Specifically, this plan discusses site background information in Section 2.0; presents emergency contingency protocols in Section 3.0; and provides additional information in Section 4.0. A list of emergency contacts is provided following Section 4.0. A site figure is provided in Appendix A. The hospital route map is provided as Appendix B.

2.0 SITE BACKGROUND

This section describes the site location, and presents a site description and project description.

2.1 SITE LOCATION

The Michner Plating Mechanic Street site is located at 520 North Mechanic Street, Jackson, Jackson County, Michigan (Appendix A, Figure 1). The geographic coordinates of the site are 42º15'15.1128'' North and 84º24'21.9240'' West. The site is located within a mixed commercial and residential area, and is bound to the north by a commercial property; to the east by North Mechanic Street with residential dwellings and commercial properties beyond; to the south by East Trail Street with commercial properties beyond; and to the west by a railroad and the Grand River (Appendix A, Figure 2). Residences are located approximately 250 feet east of site.

2.2 SITE DESCRIPTION

The site comprises approximately 3.97 acres, and contains four buildings totaling approximately 137,000 square feet: a one-story warehouse building in the northern and eastern portions of the site, a three story office building with a basement in the southwestern portion, and two garages. The site operated as a plating shop from the 1930s until 2007. The site contains approximately 1,000 drums, vats, totes, and other containers. Labels and sample analytical results indicate the potential presence of cyanide, zinc cyanide, nickel chloride, chromic acid, hydrogen peroxide,

sulfuric acid, ignitable wastes, reactive wastes (including water reactive chemicals) and other chemicals.

2.3 PROJECT DESCRIPTION

The removal project consists of characterizing, removing, and properly disposing of hazardous waste and material abandoned at the site that pose a direct contact risk or have the potential to migrate and contaminate neighboring properties and other sensitive receptors (including waterways). Site activities commenced on August 25, 2015, and are anticipated to last 4 months.

3.0 EMERGENCY CONTINGENCY PROTOCOLS

In the event of a required response by local emergency authorities during site removal activities, the following protocols provide necessary guidance for potential response events:

- Vandalism/Trespass
- Medical Emergencies
- Fire/Explosion
- Spill Control and Containment
- Evacuation Procedures

3.1 VANDALISM/TRESPASS

USEPA crews will be on site Monday through Friday (0700 to 1730 hours). A USEPA command post will be established on the site. Entry into and exit out the site will be controlled through the appropriate use of barriers, signs, and other measures as deemed necessary by the Response Manager. During afterhours times (nights and weekends), the site will be secured by via locking the doors and other entries. A security guard will also be on site during non-working hours. A copy of the Emergency Contingency Plan will be available on site.

In the event of vandalism or trespass at the site, the USEPA On-Scene Coordinator (OSC) and ERRS Removal Manager (RM) will be notified. In the case an offender is located on the premises and refuses to vacate, the RM will request assistance from the City of Jackson Police Department. If police need to enter the building to apprehend the offender, they should wear appropriate personal protective equipment (i.e., Modified Level D, including booties; booties will be available in the USEPA Command Post). **Air monitoring is conducted during working hours but not at night. If the Police request air monitoring, the ERRS and START crew will support the entry if deemed safe from a physical hazard standpoint.

3.2 MEDICAL EMERGENCIES

Rescue operations, if necessary, should be conducted by personnel wearing Modified Level D personal protective equipment (PPE) at a minimum, including booties (booties will be available in the USEPA Command Post). The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, full decontamination should be completed and first aid administered before transport. If the victim's condition is serious, emergency decontamination should be completed at a minimum. If possible, injured personnel will be decontaminated and removed from the exclusion zone before emergency medical services (EMS) arrive. EMS will pick up injured personnel at the USEPA Command Post office trailer. First responders will be notified when responding if chemical hazards require even -further upgrades to PPE.

For emergencies requiring transport to a hospital, 911 will be called. The victim should be transported to Pineview Medical Center, located at 106 Francis Street in Jackson, Michigan (517) 962-2362 (0.47 miles from site). A map showing directions to the center from the site is included as Attachment B.

3.3 FIRE/EXPLOSION

The City of Jackson Fire Department can be notified of a site emergency by calling 911. In addition, USEPA OSC Jeffrey Kimble and ERRS RM Gary Beland can be contacted by mobile phone at the numbers in the contact list.

During a hazardous materials incident, law enforcement will control perimeter access. Typically, law enforcement officers are not equipped with protective clothing, and their main function will be site control and preventing unauthorized persons from entering the hazardous area. Law enforcement should not enter the exclusion zone unless they are properly trained and wearing appropriate PPE.

The fire department, when called out to the scene of a hazardous materials emergency, has the duty and responsibility to save lives, prevent injuries, reduce property loss, and restore vital services. Command of the emergency will be established by the officer of the fire company that arrives first. The command will be transferred using fire department staff, under the Incident Command System. The Fire Chief will be in charge of the incident until he/she relinquishes that authority.

Telephone numbers of personnel who should be contacted in the event of an incident are listed on the contact list on page 6. At a minimum, please notify the following personnel of any incident:

- USEPA OSC Jeffrey Kimble
- ERRS RM Gary Beland

In the event of fire, evacuate areas within 1,600 meters (one mile) of the site in all directions. Beyond the evacuation radius, the fire department may initiate "shelter-in-place" procedures in the neighboring areas. Allow burning of material until flow can be stopped if no risk to surroundings. Use water spray, dry chemical, or "alcohol resistant" foam. Cool all affected containers with flooding quantities of water. Solid streams of water may be ineffective. Cyanide salts must be protected from large concentrations of carbon dioxide to avoid hydrogen cyanide liberation. Carbon dioxide fire extinguishers should not be used.

USEPA's START contractor (Tetra Tech) will also be available to assist with perimeter air monitoring.

3.4 SPILL CONTROL AND CONTAINMENT

In the event of a spill or release, personnel should ensure safety, assess the situation, and perform containment and control measures, as appropriate. If the event is on site, operations will cease and a designated suppression team will assemble upwind of the event. All non-essential personnel in the area will meet at the designated assembly area, depending on the alarm given.

The Site Safety Officer (designated in the field) will attempt to determine the nature and extent of the release based on waste profiles or by direct-reading instruments. The Site Safety Officer or Response Manager will direct the suppression crew in making the necessary attempts to stop the release and initiate cleanup operations. Operations will remain suspended until the incident is stabilized and no longer poses a threat to personnel.

Hazardous materials brought on site may include fuels and other petroleum liquids associated with the heavy equipment to be used during site activities. The on-site fuel tank will be staged in the support area and clearly labeled. Fuel containers will be stored in secondary plastic containers or on visqueen, bermed to contain any spill. Spill containment materials (sorbent booms and pads) will be stored on site and readily available to contain any spill that may occur.

The following equipment will be located on the job site:

- First Aid Kit
- Emergency Eyewash
- ABC Fire Extinguishers
- Chemical Sorbent Pads
- Portable Air Horns
- Portable Communication Radios or cell phones

Used materials will be properly contained, characterized, and disposed of. Fire suppression equipment will be staged in proximity to flammable materials in the prevailing up-wind direction. Equipment will also be staged and readily available in the work areas as the field activities progress across the site. This equipment is intended only for use on any small, contained fire or to allow for a safe egress from the area. Emergency responders will be notified to address any significant incidents.

3.5 EVACUATION PROCEDURES

The designated assembly area and emergency evacuation routes will be posted in the office trailer and other strategic locations as necessary. All personnel on site will be briefed on these and all emergency procedures as part of the initial safety briefing.

In the event of an emergency that necessitates evacuation of the site, the procedures listed below will be followed:

- Hand signals, audible communication, or an evacuation alarm of three blasts on an air horn will notify personnel to evacuate the site immediately.
- All personnel will evacuate with their field partners to the closest exit upwind of on-site activities. They will then assemble in the pre-designated safe area/muster point shown in Attachment C.
- Personnel will remain in that area until an all-clear signal (single, long air horn blast) is sounded or an authorized individual provides further instructions.

4.0 ADDITIONAL INFORMATION

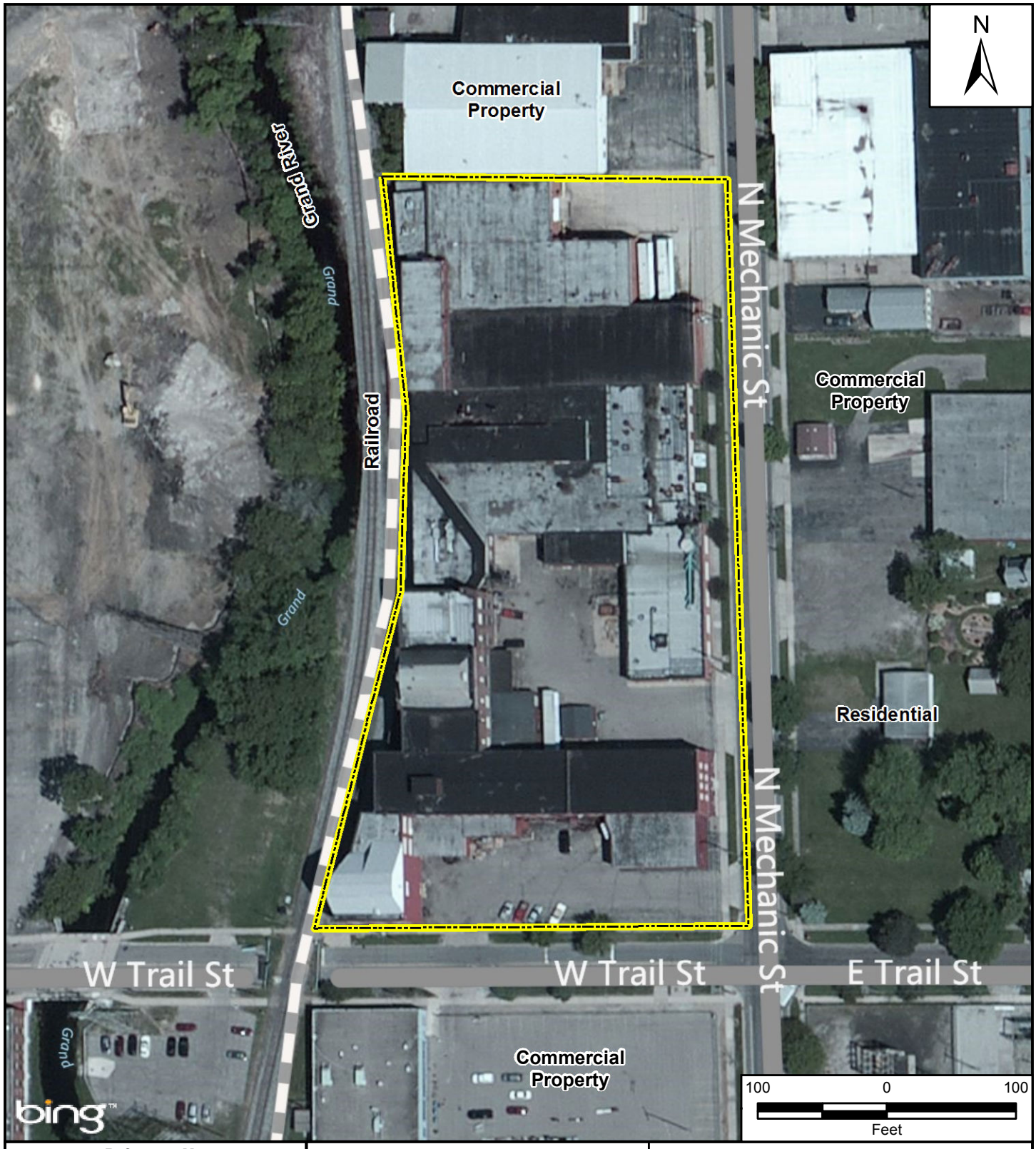
No additional information is available at this time.

LIST OF CONTACTS
MICHNER PLATING MECHANIC STREET SITE
JACKSON, JACKSON COUNTY, MICHIGAN

Agency	Name	Number
LOCAL		
Jackson City Manager	Patrick Burtch	(517) 788-4035
Jackson Fire Department	General number	(517) 788-4150 or 911
Jackson Police Department	General number	(517) 788-4100 or 911
Jackson County Health Department – Environmental Health Division	General number	(517) 788-4420
Hospital – Allegiance Health	General number	(517) 788-4800
National Poison Control Center	General number	(800) 222-1222
STATE		
Michigan Department of Environmental Quality (MDEQ), Jackson District Office	General number	(517) 780-7690
MDEQ Pollution Emergency Alert System	General number	(800) 292-4706
FEDERAL		
U.S. Environmental Protection Agency OSC	Jeffrey Kimble	(734) 740-9013
USEPA ERRS Contractor (LKR)	Gary Beland	(404) 242-9062
U.S. Environmental Protection Agency	Region 5 Spill Line	(312) 353-2318
USCG – Atlantic Strike Team	BMC Mike Presti	(860) 460-5627
National Response Center	General number	(800) 424-8802
USEPA START Contractor (Tetra Tech, Inc.)	Kelly Thomas	(313) 574-3176
USEPA START Health and Safety Officer	Chris Draper	(615) 969-1334

ATTACHMENT A

SITE FIGURES



Reference Map

Legend

Approximate Site Boundary

Source: Bing Maps Hybrid 2013

Michner Plating Angling Street Site
506-520 Mechanic Street
Jackson, Jackson County, Michicagn

Figure 2
Site Layout Map

TETRA TECH

Prepared For: EPA

Prepared By: Tetra Tech, Inc.

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TDD No.: S05-0001-1508-202

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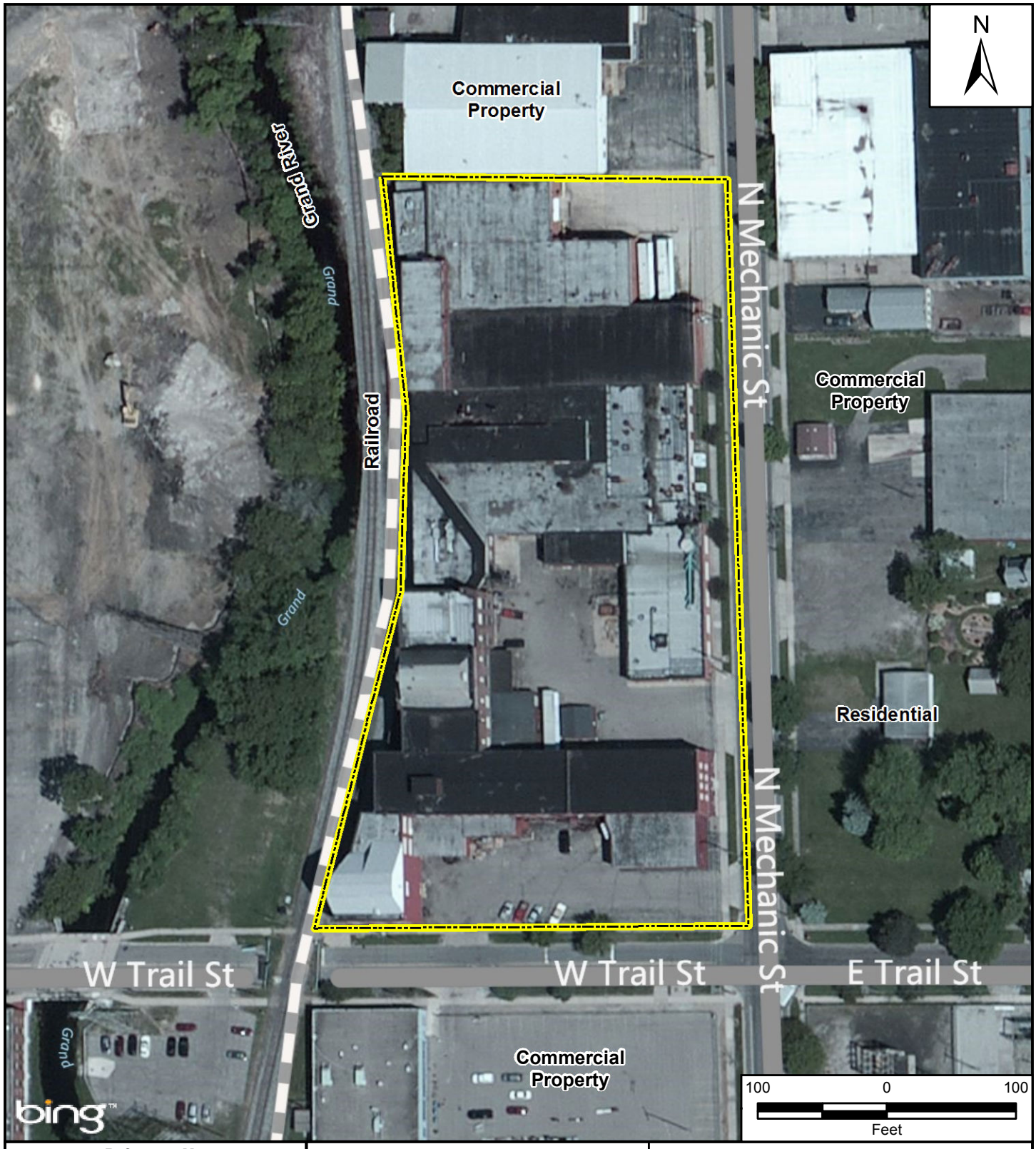

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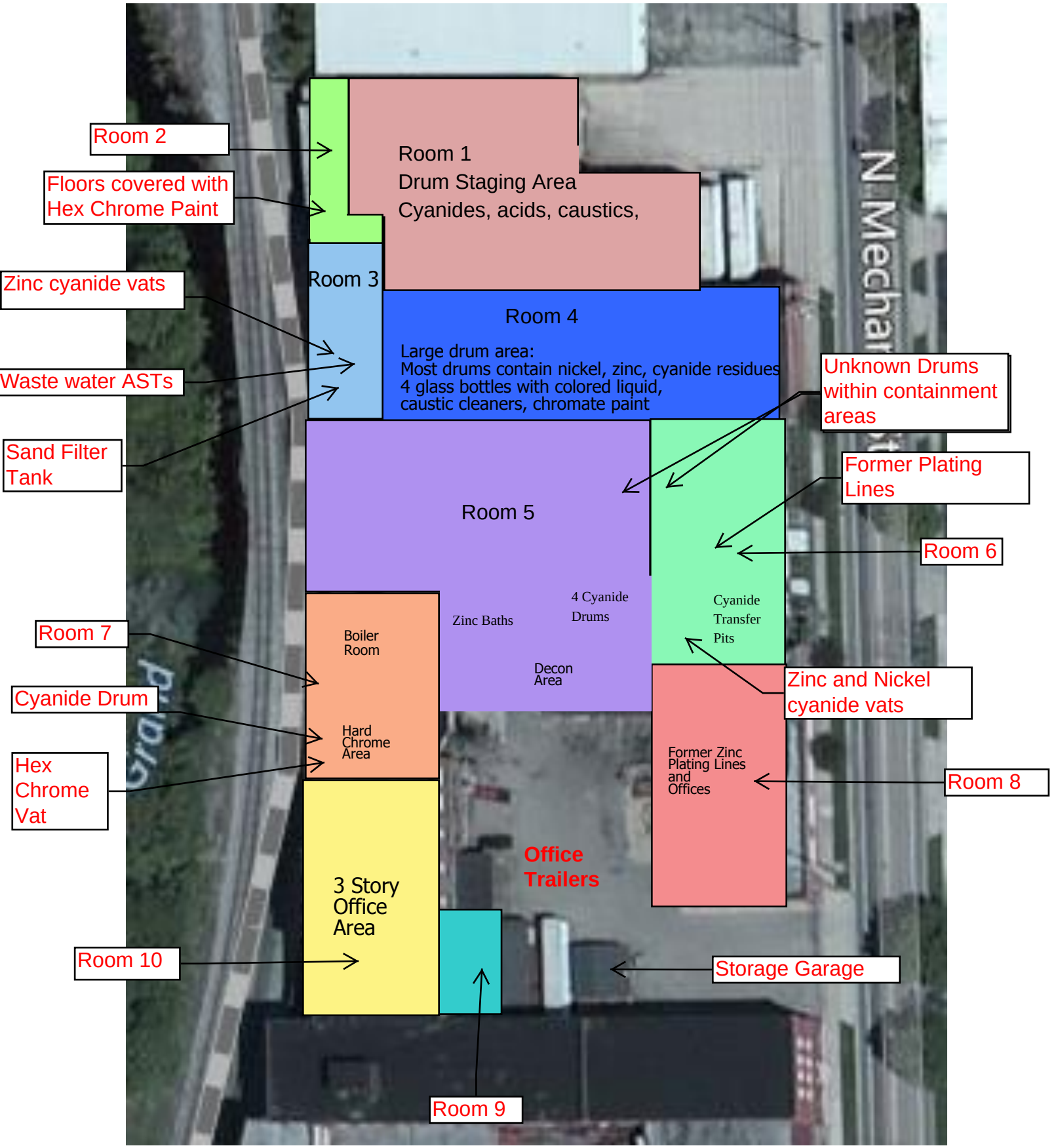

Room 2
Floors covered with Hex Chrome Paint
Room 1
Drum Staging Area
Cyanides, acids, caustics,
Room 3
Zinc cyanide vats
Room 4
Large drum area:
Most drums contain nickel, zinc, cyanide residues
4 glass bottles with colored liquid,
caustic cleaners, chromate paint
Waste water ASTs
Unknown Drums within containment areas
Sand Filter Tank
Former Plating Lines
Room 5
Room 6
Boiler Room
Zinc Baths
4 Cyanide Drums
Cyanide Transfer Pits
Decon Area
Room 7
Cyanide Drum
Zinc and Nickel cyanide vats
Hard Chrome Area
Hex Chrome Vat
Former Zinc Plating Lines and Offices
Room 8
Office Trailers
3 Story Office Area
Room 10
Storage Garage
Room 9

ATTACHMENT B

EMERGENCY HOSPITAL ROUTE MAP

Allegiance Health
205 North East Avenue
Jackson, Michigan 49201

bing Maps

A **520 N Mechanic St, Jackson, MI 49201**

B **Allegiance Health, MI**

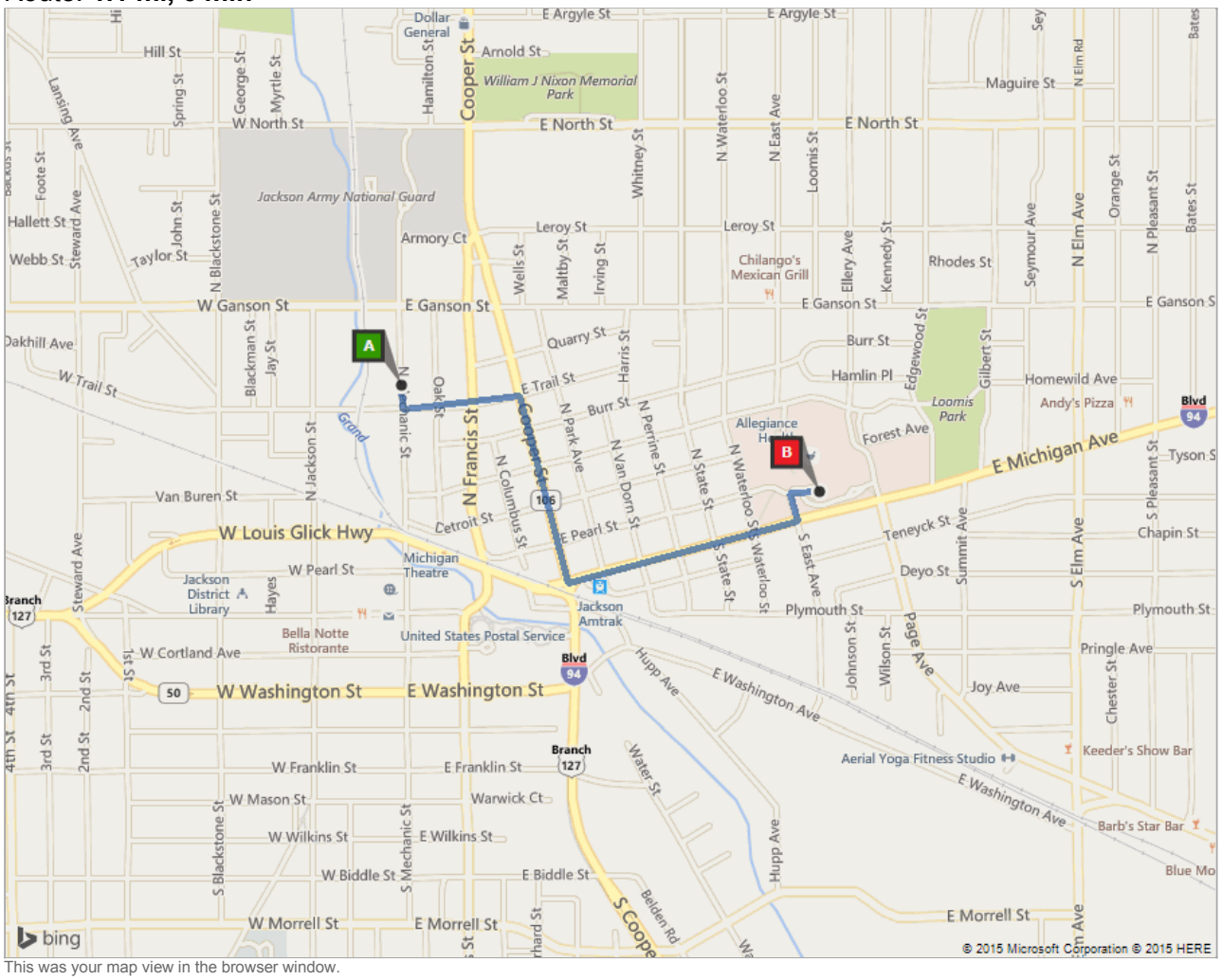
Route: **1.1 mi, 6 min**

My Notes

On the go? Use **m.bing.com** to find maps, directions, businesses, and more

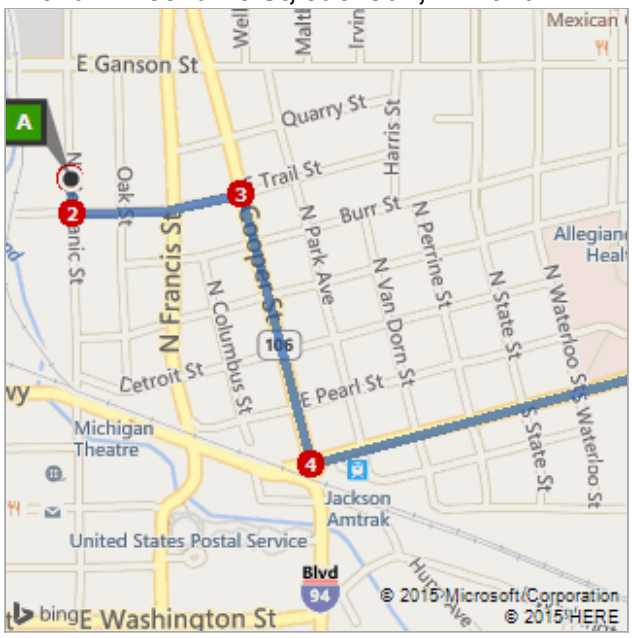
A	**520 N Mechanic St, Jackson, MI 49201**	**A–B: 1.1 mi** 6 min
	1. Depart **N Mechanic St** toward E Trail St	210 ft
	2. Turn **left** onto **E Trail St**	0.2 mi
	3. Turn **right** onto **M-106 / Cooper St**	0.3 mi
	4. Turn **left** onto **I-94 Blvd / E Michigan Ave**	0.4 mi
	5. Turn **left** onto **N East Ave**, and then immediately turn **right** onto **S Jackson Sq**	0.1 mi
B	6. Arrive at **Allegiance Health, MI** *If you reach N East Ave, you've gone too far*	

Route: **1.1 mi, 6 min**

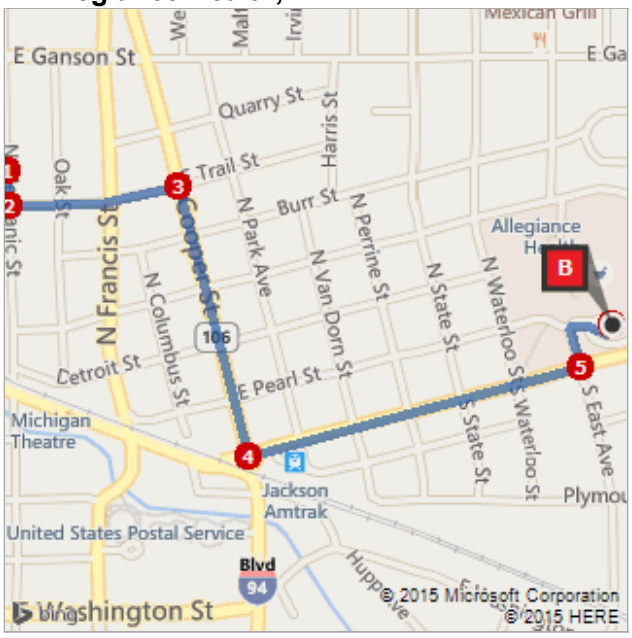


This was your map view in the browser window.

A: **520 N Mechanic St, Jackson, MI 49201**

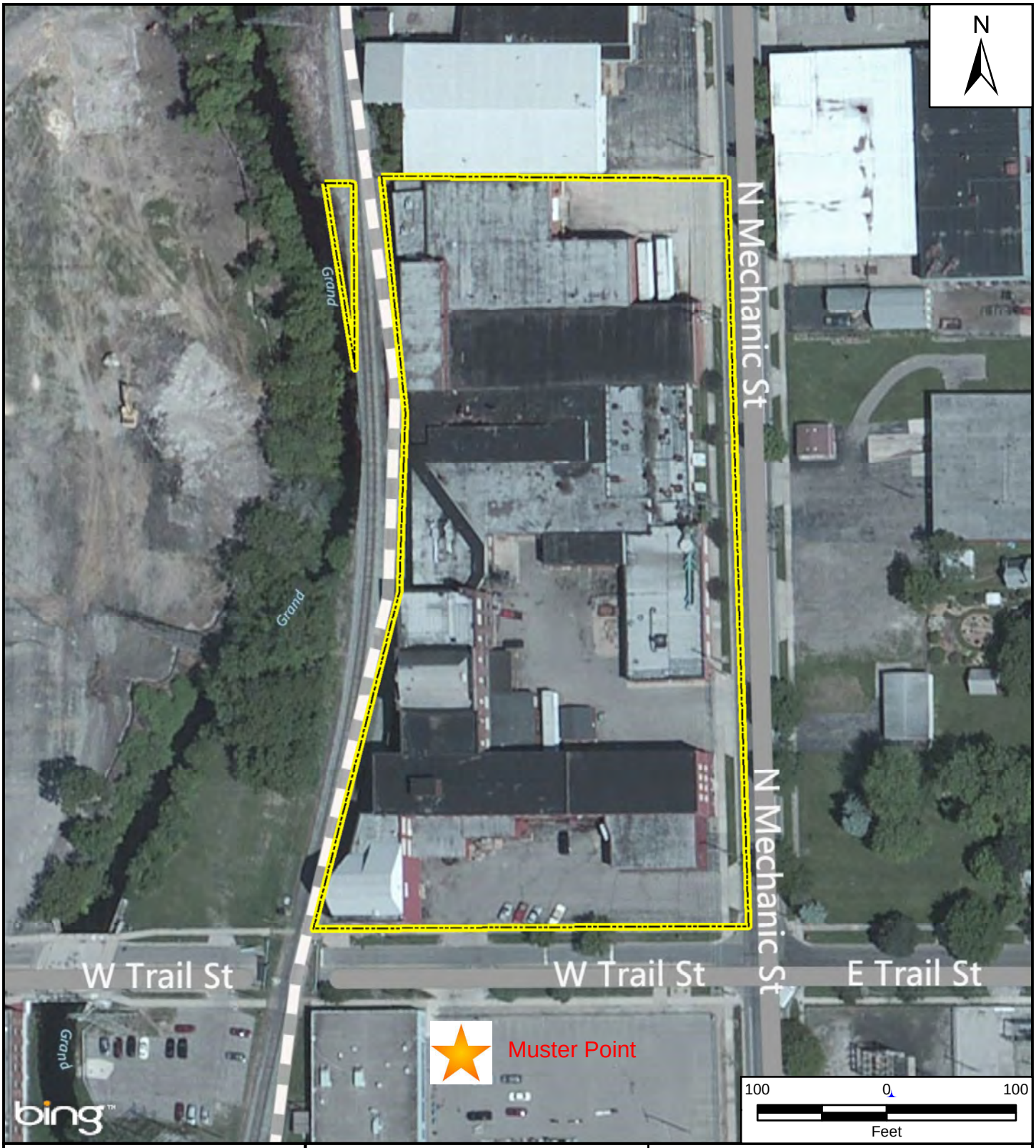


B: **Allegiance Health, MI**



ATTACHMENT C

MUSTER POINT



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