

**POLREP 2 and Special Bulletin B
Amendment
American Plating Site
4000 – 4008 E. Monument Street
Baltimore, Maryland**

DATE: May 27, 2016

FROM: Charlie Fitzsimmons, On Scene Coordinator
Eastern Response Branch (3HS31)

TO: Regional Response Center
Bonnie Gross (3HS30)
Gerald Heston (3HS31)

SUBJECT: Notification of CERCLA Emergency Removal Action

I. Issue

An emergency assessment was conducted in accordance with the National Oil and Hazardous Pollution Contingency Plan (NCP), 40 CFR Part 300. The On Scene Coordinator (OSC) has identified a threat of release of hazardous substances into the environment. The release meets the criteria for conducting a removal action under Section 300.415 of the NCP. The OSC has determined that immediate funds are needed to mitigate the threat posed to human health and the environment. The OSC had originally authorized a budget for the removal action not to exceed \$200,000, in accordance with EPA re-delegation of authority 14-2. This Amendment authorizes a \$250,000 ceiling within EPA re-delegation authority 14-2. Site conditions have not changed. This amendment changes the original May 19, 2016 Special Bulletin A document to add additional which includes the contingency.

II. Background

A. Site Description

The site is a former electroplating operation in Baltimore, Maryland, that used to be a large quantity generator under RCRA, and shut down over a year ago. The site consists of a single building located within a commercial/industrial neighborhood. The building contains abandoned electroplating vats, hundreds of containers of electroplating solutions and materials, and two lab areas with multiple small containers of various chemicals.

B. Site Background

On April 14, 2016, representatives of the Maryland Department of the Environment conducted an inspection of the facility. Based on that inspection, MDE asked for assistance from EPA. On May 3, 2016, an OSC inspected the facility with inspectors from the Baltimore City Housing

Department. The building was observed to be in very poor condition, with a leaky roof, sagging beams, electricity only in parts of the building, and no water service. There were many drums and totes of material all throughout the building, some in poor condition. There were fibre drums stored in areas where the roof was leaking. There were vats in the former electroplating area full of liquids, with labels warning of hazards.

C. Types of Substances Present

Large numbers of containers are throughout the building. Many of these are in their original containers, but are not stored in secure conditions. There are drums of acids (hydrochloric, sulfuric, and nitric), cyanide compounds (with copper, sodium, potassium, nickel), sodium hydroxide, toluene, and many more. There are many drums labeled corrosives, and a large tank half full of 50% sodium hydroxide according to the label. A full inventory of the materials in containers is being generated. The building also has two rooms of lab chemicals, including a large variety of acids and other hazardous substances.

D. National Priorities List

The American Plating site is not on the National Priorities List (NPL). The Site is part of an emergency response

E. State and Local Authorities Roles

MDE and the City of Baltimore requested EPA assistance in assessing and cleaning up the site. MDE and the City at the present time do not have the manpower or budgetary resources to complete this cleanup. MDE and the City will support EPA in the further assessment and cleanup of this site.

III. Threats to Public Health or Welfare or the Environment

Section 300.415 (b) (2) of the NCP, 40 C.F.R. § 300.415 (b) (2), identifies factors to be considered in determining the appropriateness of a removal action. Paragraphs i, v, and vii of that section directly apply as follows to the conditions at the American Plating Site:

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

There are a number of commercial operations nearby, including a food manufacturing operation on the other side of a twelve foot alley that employs over 100 people. The Amtrak main northeast corridor tracks run about 100 feet behind the building. In the event of a fire or release of cyanide gas, a large number of people could be affected by the plume or by runoff from firefighting water.

- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The roof of the building is in very poor condition and rain enters the building. This creates poor conditions for storage of hazardous substances. Increased heat during the summer months increases the threat of volatilization and release into the environment.

- (vi) The availability of other appropriate federal or state response mechanisms to respond to the release;

MDE and the City have requested that EPA conduct this removal action due to the financial and manpower burden of such an action. MDE and the City are unable to provide the necessary resources to conduct the removal action.

IV. Determination of Emergency

The OSC has determined, based upon information gathered through observations, testing, and interviews, that many hazardous substance have been released and/or have the potential to be released to the environment. The Site conditions constitute an emergency. Therefore, the OSC activated on May 18, 2016.

V. Proposed Actions and Estimated Costs

A. Actions

1. Mobilize personnel and equipment to the Site to implement response actions;
2. Provide security to limit access to the Site to prevent trespassers from contacting hazardous substances and, at the direction of the OSC, secure the building as needed.
3. Stabilize leaking drums, tanks, pipes, vats, and other containers to prevent further releases of hazardous substances, pollutants, or contaminants;
4. Characterize and segregate for removal all hazardous substances, pollutants, and/or contaminants in drums, tanks, pipes, vats, and other containers as well as associated contaminated materials that may pose a threat;
5. Sample, overpack, transfer, consolidate, or otherwise prepare the hazardous substances, pollutants, and/or contaminants identified for removal and off-Site disposal in accordance with Section 121(d) of CERCLA and 40 C.F.R. §300.440;
6. Arrange for and conduct transportation for off-site disposal of hazardous substances, pollutants, and/or contaminants prepared for removal pursuant to Items #4 and #5, above.
7. Dispose off-Site all hazardous substances, pollutants, and/or contaminants identified above pursuant to Section 121(d)(3) of CERCLA and 40 C.F.R. § 300.440.

B. Estimated Costs

	Ceiling
ERRS	\$220,000
START	<u>\$ 30,000</u>

TOTAL \$250,000

C. Contribution to Remedial Performance

A remedial action is not anticipated and therefore this removal action is not inconsistent with any proposed remedial action.

D. Compliance with ARARS

The removal action will comply with all Applicable or Relevant and Appropriate Requirements (ARARs), to the extent practicable, considering the exigencies of the situation.

VI. Expected Change in the Situation should No Action be Taken or Action Delayed

The building will continue to deteriorate as neither the tenant nor the owner are conducting repairs. The deteriorations of the building will increase chances of further degradation of materials in the building, or the likelihood of a fire. As summer arrives the increasing temperatures will continue to further volatilize the hazardous substances on-site, creating an actual or potential release to the environment and to people in the area.

VII. Outstanding Policy Issues

There are no known outstanding policy issues for this Site.

VIII. Enforcement

The OSC will continue to coordinate with EPA enforcement to identify any viable responsible parties.

 5.27.16

Charlie Fitzsimmons
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EPA Region III