

**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Thursday, July 30, 2009

From: Jon Gulch

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Subject: Initiation of Removal Action
Plabell Rubber Manufacturing Plant Site
300 South St. Clair, Toledo, OH
Latitude: 41.6433000
Longitude: -83.5433000

POLREP No.:	1	Site #:	B5PX
Reporting Period:	July 20-30, 2009	D.O. #:	005
Start Date:	7/20/2009	Response Authority:	CERCLA
Mob Date:	7/20/2009	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	OHN000510305	Contract #	EP-S5-08-04
RCRIS ID #:			

Site Description

The Plabell Rubber Manufacturing Site (the Site) is an abandoned rubber manufacturing facility that designed custom molding and specialized rubber products for a wide variety of applications. For 61 years, a broad variety of equipment for injection, transfer, compression molding, and roll covering was operated at the Site. In recent years, the facility also used REP Intelinject injection presses which permitted the facility to produce precision parts. The facility manufactured products for the automotive, refrigeration, appliance, steel, glass, marine, and medical industries. The manufactured products included: neoprene, ethylene propylene (EPDM), nitrile, silicone, urethane, viton, SBR, and natural rubber. The current owner of record and former operator of the Site, St. Clair Rubber Corporation, went out of business in 2006. The St. Clair Rubber Corporation was an employee owned corporation specifically formed to take over operations from the historic owners/operators, Plabell Rubber Products, Inc. and St. Clair Rubber Corporation, which went out of business in 1991.

The Site is located at 227 and 300-332 South St. Clair Street and 406 Williams Street, Toledo, Lucas County, Ohio 43602. The Site contains three buildings and a flammable storage shed totaling approximately 61,200 square feet. The Site occupies 13 city lots, approximately 3.028 acres in size, and is located in an area that is primarily residential with some industrial subdivisions. It is bounded immediately on the north and west by Swan Creek (a tributary of the Maumee River), the City of Toledo's Water Division Office and the Erie Street Market (a weekend, outdoor market); on the south by a United States Post Office; and on the east by several commercial and industrial properties and newly built residential condominiums. In addition, Fifth-Third Field, which is a 12,000 person capacity outdoor multi-use sports complex, is located within 0.25 miles of the Site. The Site is approximately 0.5 miles west of the Maumee River and approximately 0.25 miles from the downtown Toledo business district. According to area census data, there are six schools (at least one public school with an outdoor playground), 10 churches, and 386 homes within .75 miles of the Site (Comparative Demographic and Housing Report for Greater Neighborhood Census Tract 38.02 Ohio 43602).

The geographical coordinates for the Site are 41° 38' 36" north latitude and -83°32' 36" west longitude. As of September 11, 2008, there are approximately 32 55-gallon drums, 34 30-gallon drums, 67 5-gallon containers, 6 fiber boxes, and 400 laboratory containers of unknown waste abandoned in the buildings at

the Site. In addition, there is laboratory-confirmed asbestos containing material in the buildings and in an underground storage tank. The surrounding soil is potentially contaminated with chemical constituents.

The Site is not completely fenced or otherwise enclosed or protected, and unsecured windows and doors provide unrestricted access to most areas of the Site.

On September 10, 2008, EPA and the Superfund Technical Assistance and Response Team (START) mobilized to the Site and conducted a Site Assessment, which included a site reconnaissance and drum/container inventory in all buildings at the Site. During the reconnaissance of Bld-1, START conducted an inventory of the drums and containers; documented label and marking information on the drums and containers; and documented conditions of all drums and/or containers. Approximately 130 drums and containers were inventoried and marked. The inventory included 32 55-gallon drums (steel and poly drums), 34 30-gallon drums (fiber and plastic), 67 5-gallon containers (steel and poly), and 6 fiber boxes. Approximately 400 small containers were located throughout Bld-1, including the research laboratory. A majority of the drums and containers did not have labels or markings and several had elevated VOCs based on MultiRAE PID readings.

Several of the drums were labeled as containing hydraulic oil, gear lubricant, and bis (dimethylthiocarbamoyl) disulfide (CAS 137-26-8). In addition, there were several drums labeled "copper dimethyl dithiocarbonate" and "Hazardous and Harmful, Stow Away from Foodstuffs" (marked D-66, D-75, and D-76). The majority of the 5-gallon containers were in poor to fair condition and several contained "flammable" labels. Over 350 small containers (1-gallon or less) were located inside four cabinets in the research laboratory. An additional 50 small containers were scattered throughout the remaining parts of Bld-1.

Bld-2 is a six-story building located at 228 South St Clair Street. The building had signs of forced entry and each floor was approximately 3,800 sq ft. The majority of the drums were located on floors 3 and 5. During the reconnaissance of building Bld-2, all of the drums and labels were documented and an inventory of the drums and containers was conducted. The inventory included a pallet of six fiber drums labeled as "copper dimethyl dithiocarbonate" and "Hazardous and Harmful, Stow Away from Foodstuffs" and several pallets of approximately 20 50-pound bags of raw material. The six drums on the 3rd floor were in good condition and wrapped in plastic and staged on a pallet. The drum on the 5th floor was on a pallet and was in good condition.

The Flammable Storage Building (FSB) is a small one story building located at 300 South St. Clair Street. During the reconnaissance of the FSB, an inventory was conducted and included seven 55-gallon steel close-top drums (Drums D-81 through D-87), 16 marked 5-gallon containers (poly and steel), and nine small containers (1-gallon or less) marked as paint, paint thinner, paint stripper, and/or primer. The floor near the pallets had visible stains indicating past spills of unknown material and/or poor housekeeping. Inside the FSB, a vagrant had made a living area by erecting a make-shift bed using a thick sheet of plywood and several 5-gallon containers as footers. Evidence of trespassing was observed in all of the buildings.

Bld-3 is located at 227 South St Clair Street, and is a two-story 10,000 sq ft building with a basement and a second floor. During the reconnaissance of Bld-3, an inventory was conducted and approximately 14 55-gallon drums (poly and steel), one full 55-gallon steel drum, (drum D-104) containing an unknown oily material, and one partially filled 55-gallon steel drum (drum D-117) with an UN 1897 label and marked "perchloroethylene." In addition, there were two 10-gallon containers and nine 5-gallon containers located near the Front entrance of the facility. During this reconnaissance, signs of potential Asbestos Containing Material (PACM) were observed on the floor.

Current Activities

On July 20, 2009, U.S. EPA, START, and Emergency and Rapid Removal Service (ERRS) contractors mobilized to the Site and performed a walk-through of the interior and exterior of multiple buildings throughout the site. Site security and the EPA mobile command post were also mobilized to the site on this date.

From July 20-24, 2009, EPA secured multiple broken windows on the west and east side of Building 1 (300 S. St. Clair Street) and multiple entrance ways on the west side of Building 2 (227 S. St. Clair Street) where there was evidence of trespassing. Additionally, the interior of the north entrance room in Building 1 was cleared of miscellaneous debris, including 5 55-gallon drums, to build the temporary Emergency Decontamination Room. The 55-gallon drums were staged in another portion of the warehouse.

From July 25-30, 2009, the Emergency Decontamination Room was completed, a drum and small

container staging area was constructed, and all drums and small containers in Building 1 were collected and staged for future sampling and disposal. In addition, three large debris piles were sorted after several drums, small containers and bags of unknown powders were discovered in the debris. Additionally, all drums and small containers from the Flammable Storage Building (FSB) were transferred to the designated staging area in Building 1.

On July 29, 2009, the six story Building 2 was re-inventoried to confirm previously documented site assessment activities. An additional six drums and several pallets of powders were identified on the fourth and sixth floors. A plan for removal of these materials has currently being developed.

During all removal activities, air monitoring is being conducted within the facility and around the perimeter. During non-working hours, a company has been hired to provide security services.

Planned Removal Actions

- Begin segregation of materials in Buildings 2 & 3;
- Start drum, small container and unknown powder sampling;
- Perform Field Hazard Categorization (HazCat);
- Develop waste streams; and
- Perform final disposal.

Next Steps

Continue Time-Critical Removal Action

Key Issues

Site Security continues to experience random, overnight trespassing activities by vagrants.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$38,600.00	\$61,400.00	61.40%
RST/START	\$25,000.00	\$5,800.00	\$19,200.00	76.80%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$50,225.00	\$4,000.00	\$46,225.00	92.04%
USEPA - InDirect	\$5,040.00	\$0.00	\$5,040.00	100.00%
Total Site Costs	\$180,265.00	\$48,400.00	\$131,865.00	73.15%

* 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.

response.epa.gov/PlabellRubber

POLREP #1 Last Updated 7/30/2009