United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Thursday, October 1, 2009
From: Jon Rinehart

Subject: FINAL POLREP - Removal Action No. 1 (Access Restriction)
Mitcham Street Drums
312 W. Mitcham Street, Malakoff, TX
Latitude: 32.1695000
Longitude: -96.0164500

POLREP No.:	1	**Site #:**	A6E8
Reporting Period:		**D.O. #:**	
Start Date:	9/11/2009	**Response Authority:**	CERCLA
Mob Date:	9/11/2009	**Response Type:**	Emergency
Demob Date:	9/30/2009	**NPL Status:**	
Completion Date:	10/1/2009	**Incident Category:**	Removal Action
CERCLIS ID #:	TXN000606855	**Contract #**	
RCRIS ID #:			

Site Description
At 1656 EST on 18 March 2008, Texas Commission on Environmental Quality (TCEQ) notified the National Response Center (NRC#865386) of a discharge of materials from multiple containers at a former metal plating facility in Malakoff, Henderson County, Texas. TCEQ representatives stated that the site was previously operated by BBB Bumper Manufacturing and has been out of operation for at least eight years. The site is located near downtown Malakoff, adjacent to a retail shopping center and a church.

Current Activities
On 11 September 2009, EPA and START-3 arrived at the property to observe current conditions and to make observations and calculations in preparation of performing a removal assessment. START-3 was on-site to document security fence installation and current site conditions. START-3 also performed air monitoring inside of the building and at the site perimeter with no readings observed above background levels. EPA and START-3 observed that a sky light panel (4 feet by 12 feet) was missing from the roof. According to a neighboring small business owner, the panel was blown-off during a recent thunderstorm. The floor of the north-end of the facility was inundated with water as a result of rain activity and the missing roof panel.

Including the 71 containers reported by TCEQ contractors to be on-site and the containers waste products were drummed by TCEQ (in April 2009), START-3 counted a total of approximately 191 containers at the site location [(127) 55-gallon drums, (8) 90-gallon poly over-packs, (8) 75-gallon metal over-packs, 47 drums and containers less than 55-gallons, and (2) 108-gallon poly over-packs. Various drums had deteriorated or improper bungs.

While on-site, EPA observed the results of actions performed by TCEQ and TCEQ contractors in April 2009. Under emergency actions, TCEQ removed drums from a dilapidated lean-to structure located on the north-end of the facility; staged all drums on pallets at the south-end of the facility; removed a portion of concrete secondary containment to access a process station consisting of thirteen, 200 to 1000 gallons; scraped solid waste material from the floor of the secondary containment and placed it in drums; characterized process wastes contained in the vats, transferred the process materials contained in the vats into 55 gallon drums; over-packed leaking drums; picked-up leaking and spilled product; picked-up debris and trash and staged in empty vats; demolished the lean-to structure and staged and stock-piled the resulting debris in the north-end of the facility; covered the newly exposed etched and stained concrete slab with two inches of clay soil to minimize rain run-off; and repaired damaged and deteriorated sections of roof to prevent run-off of rain water into the facility. TCEQ contractors labeled the drums after process materials and wastes were transferred from the vats and the floor (sodium hydroxide, water with heavy metals, sulfuric acid, nickel, chromium, and water with chromium). TCEQ contractors counted 71 containers at the facility upon arrival [20 Empty: (5) 5-gallon, (1) 15 gallon poly, (1) 35 gallon poly, (2) 55 gallon steel, (11) 55-gallon poly] [51 with content: (2) 5-gallon steel, (8) 5-gallon poly, (1) 15 gallon steel, 1 (15) gallon unspecified; (1) 30-gallon steel, (1) 30 gallon fiberboard, (6) 55-gallon steel, (24) 55-gallon

poly, (7) 55-gallon unspecified] containing an estimated 1811.5 gallons of content.Drums already on-site displayed various chemical labels (nitric acid, sulfuric acid, hydrochloric acid, nickel chloride, chromium plating reagent, calcium hypochlorite, and Almate, a preparation zinc-oxide chemical that deposits an adherent zincate film on aluminum prior to electroplating). Upon completion of TCEQ activities, the site was no longer classified as an emergency response site.

TCEQ transferred jurisdictional authority to EPA. EPA initiated procedures to determine ownership of the facility to gain a legal access agreement. The procedure took more than five months to complete due to complications resulting from the previous sale of the property to new owners.

On 28 September 2009, EPA-led ERRS contractors installed approximately 510 feet of chain-link fence (34, 6 feet by 15 feet panels) along the perimeter of the facility to prevent access to the facility to potential trespassers. Prior to fence installation, START-3 arrange for the property to be surveyed and for utility lines to be located. START-3 was on-site to document security fence installation and current site conditions. START-3 also performed air monitoring inside of the building and at the site perimeter with no readings observed above background levels. ERRS also replaced a 4 feet by 12 feet skylight with an metal roof panel equivalent in size to prevent run-off of rain water into the facility. ERRS placed two weather-resistant EPA identification signs on the fence. START-3 performed property dimensional measurements in preparation of preparing a removal assessment sampling plan. EPA OSC Jon Rinehart arrived on-site on 29 September and approved of the quality of the security fence installation.

Planned Removal Actions

EPA will perform a removal assessment consisting of soil sampling and the conduction of further waste characterization, eventually leading to the removal of drums and chemicals, solid waste, and debris, as well as the removal of soil, if determined by laboratory analysis to be contaminated.

Next Steps

EPA will perform a removal assessment consisting of soil sampling and the conduction of further waste characterization, eventually leading to the removal of drums and chemicals, solid waste, and debris, as well as the removal of soil, if determined by laboratory analysis to be contaminated.

Key Issues

Proximity of the site to residential and commercial areas may constitute a hazard to the public. Poor site conditions may result in offsite impacts by hazardous materials present on-site.

response.epa.gov/MitchamStreetDrums