

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Custom Chrome Plating Site - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial POLREP
Custom Chrome Plating Site
B5VU
Dayton, OH
Latitude: 39.7837180 Longitude: -84.1856619

To:
From: Steven Renninger, On-Scene Coordinator
Date: 4/28/2010
Reporting Period: March 10 through May 6, 2010

1. Introduction

1.1 Background

Site Number:	B5VU	Contract Number:	
D.O. Number:		Action Memo Date:	4/12/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/3/2010	Start Date:	5/3/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Custom Chrome Plating (CCP) Site is located in a mixed commercial and light industrial area of Dayton, Ohio. The Site is located within 25 feet of another commercial business. The Site is bordered to the north by 836 Hall Avenue (a commercial business – Merrick Manufacturing); to the south by a vacant lot and a commercial business (McIntosh Safe Corporation); to the east by Interstate 75; and to the west by Hall Avenue. The Site contains a 5,373-square-foot building and a parking lot on 0.26 acre of land and is located approximately ½-mile east of the Great Miami River.

1.1.2.1 Location

The CCP Site is located at 828 Hall Avenue in Dayton, Montgomery County, Ohio. The geographical coordinates for the Site are 39° 47' 0.2034" North latitude and 84° 11' 9.06" West longitude.

1.1.2.2 Description of Threat

The CCP facility conducted chrome plating at the Site from 1985 until Fall 2009. The various on-site plating lines contain approximately 25 chrome plating vats and tanks. In addition to the plating lines, the Site contains approximately 100 55-gallon drums and other waste containers. The facility terminated operations at the Site on August 19, 2009.

On March 2, 2010, U.S. EPA obtained a signed access agreement from the former operator/owner of the CCP facility allowing U.S. EPA access to conduct sampling activities.

On March 4, 2010, Ohio EPA submitted a letter to U.S. EPA requesting assistance from the U.S. EPA Region V Superfund Division in conducting a potential time-critical removal action involving uncontrolled drums, vats and tanks containing chrome plating waste at the Site. Ohio EPA estimated that approximately 2,200 gallons of waste plating materials were present at the Site.

Ohio EPA also noted that the CCP facility was no longer in operation and that the City of Dayton turned off

water and electrical services to the facility in 2009. The facility remains idle, and it is unclear if and when CCP will begin operations again. After CCP ceased operations in Fall 2009, hazardous wastes and other materials have accumulated at the facility. Ohio EPA stated that CCP is unclear about when it expects that all hazardous waste will be removed from the facility and properly disposed of at a permitted hazardous waste facility. To date, hazardous waste remains at the facility and the potential for a release to the environment and public health endangerment is possible.

On March 10, 2010, U.S. EPA conducted a site assessment at the CCP Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On March 10, 2010, U.S. EPA conducted a site assessment at the CCP Site and observed approximately 25 chrome plating vats and tanks and 100 55-gallon drums and other waste containers within the facility. During the site assessment, U.S. EPA collected 9 liquid waste samples and 2 solid waste samples from drums, plating vats and containers. Analytical results indicated seven liquid waste samples having a pH value of less than 2.0 standard units and therefore meet the criterion for hazardous waste by virtue of corrosivity as defined in 40 CFR 261.22. Analytical results indicated that five investigative samples have TCLP chromium concentrations greater than 5.0 mg/L, with a maximum TCLP chromium concentration of 11,900 mg/L, and therefore meet the criterion for hazardous waste by virtue of toxicity as defined in 40 CFR 261.24. Analytical results indicated that two investigative liquid waste samples have flash points of less than 140 °F and therefore meet the criterion for hazardous waste by virtue of the characteristic of ignitability as defined in 40 CFR 261.21.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On April 12, 2010, the Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving the removal action at the CCP Site.

On April 22, 2010, U.S. EPA obtained a signed access agreement from the former operator/owner of the CCP facility allowing U.S. EPA access to clean up the site.

On April 23, 2010, a delivery order was issued to the ERRS contractor (EQM) to conduct removal activities at the site.

2.1.2 Response Actions to Date

On May 3, 2010, ERRS mobilized office trailers and set up the command post at the site.

On May 4, 2010, a generator was installed to provide temporary electrical service to the command post. The generator will be used for a few weeks until electrical service can be hard wired.

On May 4, 2010, U.S. EPA met with the Dayton Fire Department to discuss emergency contingency planning and emergency contact numbers. The information will be used to complete the Emergency Contingency Plan which, when finalized, can be found in the Documents section of this website.

On May 6, 2010 the Health & Safety Plan was approved by U.S. EPA, START and ERRS. Roll-off boxes were staged in the support zone.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified two PRPs, but they did not respond to General Notice Letters from US EPA.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

US EPA will conduct the following activities:

1. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory and perform hazard characterization on all substances contained in containers, drums, vats, and tanks;

4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
5. Dismantle and decontaminate process equipment, tanks and building components associated with the plating area, as necessary;
6. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440).

2.2.1.1 Planned Response Activities

See Section 2.2.1.2

2.2.1.2 Next Steps

1. Set up contamination reduction zone.
2. Begin sampling all drums, containers, plating vats and tanks on site.
3. Hazard categorize samples.
4. Collect waste disposal samples.
5. Generate Waste Profiles.
6. Dismantle plating process equipment.
7. Decontaminate and cut up plating vats and tanks.

2.2.2 Issues

None.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

On May 5, 2010, the Site H&S Plan was finalized.

On May 10, 2010, all site personnel will read and sign the approved H&S Plan.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Ohio EPA DERR

Dayton Fire Department

4. Personnel On Site

- 1 EPA OSC
- 5 ERRS (EQM and Inland Waters of Ohio)
- 1 START (Weston Solution)

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

6.2 Reporting Schedule

The next POLREP will be issued in approx 2 weeks.

7. Situational Reference Materials

No information available at this time.