U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Midwest Metallurgical Laboratory - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Midwest Metallurgical Laboratory Removal Action
Midwest Metallurgical Laboratory
BVTY
Marshall, MI
Latitude: 42.2944370 Longitude: -85.0037194

To: Carol Ropski, U.S. EPA

From: Jeffrey Lippert, On-Scene Coordinator
Tricia Edwards, On-Scene Coordinator

Date: 5/14/2010

Reporting Period: 5/11/2010 - 5/14/2010

1. Introduction

1.1 Background

Site Number:	B5TY	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/6/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	5/11/2010	**Start Date:**	5/11/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:	MIN000510419	**RCRIS ID:**	
ERNS No.:		**State Notification:**	MDNRE
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

The site is categorized as a Time Critical Removal Action.

1.1.2 Site Description

The Site consists of a 25-acre industrial parcel bordered by 15 Mile Road and agricultural and residential properties to the west, vacant land to the north and east, and agricultural to the south. The Site is the former location of Midwest Metallurgical Laboratory, a foundry for the Detroit Stoker Company. The Site includes one main building, an office area and two smaller out buildings.

1.1.2.1 Location

The Site is located at 15290 15 Mile Road in Marshall, Calhoun County, Michigan 49068 in a mixed residential/industrial/agricultural area. Coordinates for the Site are 42.294437 degrees north and -85.0037194 degrees west.

1.1.2.2 Description of Threat

Several drums, totes, transformers, and other containers contained hazardous waste or potentially hazardous chemicals, including strong acids, ignitable liquids, waste oil, and waste liquids with hazardous concentrations of selenium. Many of the drums were in poor condition and were corroded or bulging. As described above, four liquid samples from Site drums, totes, and containers were identified as characteristically hazardous wastes. The buildings have been broken into and vandalized, and scrap metal from the property has been illegally salvaged by trespassers. Weathering and activity of trespassers could cause containers on-site to breach and the contents of the containers could thereby be released into the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The analytical results from four liquid samples containing acids indicated that the material is characterized as hazardous waste by corrosivity as defined in 40 CFR § 261.22. Corrosive wastes are considered characteristic hazardous wastes if they have a pH less than 2 or greater than 12.5 standard units (su). Analytical results showed that a sample collected from an unlabeled 250-gallon poly tote had a pH of 0.0 su. Two other containers, an unlabeled 16-gallon poly drum and a “sulfuric acid”-labeled 1-gallon glass laboratory bottle also had a pH of 0.0 su. Analytical results for another liquid sample collected from a 250-gallon poly tote labeled “Resin Binder” indicated it had a pH of 14.00 su.

In addition, TCLP results from a 250-gallon tote and 16-gallon poly drum showed concentrations of selenium that exceeded the Maximum Concentration of Contaminants for the Toxicity Characteristic as defined in 40 CFR § 261.24.

Soil samples collected from outside the building showed levels of arsenic above the State of Michigan's Part 201 Generic Cleanup Criteria for Residential and Commercial I Direct Contact Exposure. In an area where numerous large bags of "bag house dust" were dumped, the levels of arsenic in the soil were as high as 13 ppm. This level is in exceedance of the State's Direct Contact Level of 7.6 ppm. The soil contamination is in close proximity to a deer bedding area.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The Midwest Metallurgical Laboratory (MML) was founded in 1942. The casting/foundry building was constructed in 1960. The Site is a former ductile iron casting facility that provided complete foundry services, including Ni-Hard and Grey Iron castings from 1 to 900 pounds. In March 2002, the announcement was made that the MML facility was to be phased down and closed later that year as part of a plan to outsource production to lower cost producers. At the time of its closing, the MML facility employed approximately 65 workers. Since the closing of the MML facility, Charleston Auctions has held several public auctions in an attempt to sell Site equipment and property.

U.S. EPA conducted an assessment at the Site on October 5 and 6, 2009. Most buildings at the Site were found to contain uncontrolled hazardous wastes (containers labeled flammable, corrosive, and oxidizer). Numerous drums, totes, and small containers of various sizes were found opened and unlabeled both inside the buildings and around the grounds. U.S. EPA quantified more than 2,500 gallons of uncontrolled and unidentified liquid wastes on the property. Five waste liquid samples were collected yielding pH results that are characteristically hazardous or TCLP levels that are characteristically toxic.

U.S. EPA documented unrestricted Site access in many areas and visual evidence of trespassing throughout the buildings and grounds. Numerous locks have been cut and fencing has been taken down by trespassers, vandals, and thieves in efforts to gain access to the buildings and property.

2.1.2 Response Actions to Date

On Tuesday 5/11/10 the following response actions were undertaken at the site by the ERRS contractors:

- EPA/START and ERRS mobilized to the site.
- Held initial site Health and Safety Meeting with all personnel including EPA/START and ERRS.
- Performed clearing of tall vegetation in preperation of setting up site trailers and received one large roll-off dumpster for nonhazardous solid waste, and other support equipment.
- Mounted site signs at the entrance to the site.
- Started the setup of the support zone in the northeast corner of Building 1.
- Set up site security to be onsite from the hours of 1730pm to 0700am to secure the site during hours work is not being conducted.

On Wednesday, 5/12/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS personnel set up the EPA/START site trailer and was hooked up with electricity.
- ERRS and EPA/START collected 2 (3 point composite) dust/waste solid samples from the floor of the northern half of Building 1 for TCLP Metals and Total Metals analysis to evaluate the concentrations in the dust material present.
- ERRS continued to work on the support zone and placed fencing up to demarcate work areas.
- Gravel placed in driveway and around the site trailer for better access to the site and to the site trailer.

On Thursday, 5/13/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS personnel swept and cleaned the northeast portion of the floor in Level C PPE in preperation to set up the contaminant reduction zone (CRZ).
- ERRS set up their site trailer and had electricity and phone service hooked up as well.

On Friday, 5/14/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS have electricity and lighting now ready for use in Building 1.
- Started setting up a waste staging area.
- Started moving empty containers to the waste staging area.

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

MML filed for Chapter 11 bankruptcy in the U.S. Bankruptcy Court for the Northern District of Indiana on July 12, 2006, Case No. 16857-02. The case was converted to Chapter 7 on June 2, 2008.

Taxes for the 2004-2009 remain unpaid, and there are tax liens on the real property for tax years 2004-2008 totaling over $164,000. IN addition on 2/2/2005, creditor Detroit Stoker Company recorded a judgment lien on the property in the amount of $354,000. the Trustee put the property up for sale but offers were insufficient to satisfy the pending liens.

2.1.4 Progress Metrics

No waste has been disposed to date.

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

Anticipated activities for the week of May 17, 2010 include

- Staging drums and containers in the south staging area;
- Logging containers and contents;
- Beginning Hazardous Characterization of the container contents.

2.2.1.1 Planned Response Activities

N/A

2.2.1.2 Next Steps

- Excavation of contaminated soil east of the building;
- Removal of contaminated foundry sand piles within the building;
- Disposal of hazardous waste containers.

2.2.2 Issues

None.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

John Behrens

2.6 Liaison Officer

None.

2.7 Information Officer

2.7.1 Public Information Officer

Mic Hans

2.7.2 Community Involvement Coordinator

None.

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Township of Marshall Michigan
Michigan Department of Natural Resources and Environment
Calhoun County

4. Personnel On Site

Jeff Lippert, U.S. EPA
Tricia Edwards, U.S. EPA
Keith Lesniak, U.S. EPA
John Behrens, Environmental Restoration, LLC
Rich Fellores, Environmental Restoration, LLC
Kellie Lippnet, Environmental Restoration, LLC

Jamie Robinson, Environmental Restoration, LLC
James Kalberer, Environmental Restoration, LLC
Keith Kidder, Weston Solutions

5. Definition of Terms

U.S. EPA - United States Environmental Protection Agency
START - Superfund Technical Assessment and Response Team
ERRS - Emergency and Rapid Response Service
NCP - National Contingency Plan
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
RCRA - Resource Conservation and Recovery Act

6. Additional sources of information

6.1 Internet location of additional information/report
None.

6.2 Reporting Schedule
PolReps will be issued weekly.

7. Situational Reference Materials

NCP
CERCLA
RCRA