

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Removal Action Continues
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: 5/21/2010

Reporting Period: 5/17/10 - 5/21/10

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 Monday, 5/17/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS continued collecting waste containers and empty containers throughout Building 1 and placing them in the appropriate container segregation/staging areas utilizing Level C PPE.
- EPA/START provided breathing zone air monitoring support during work activities using a Multirae PID to monitor for volatile organic compounds (VOCs), carbon monoxide, hydrogen sulfide, lower explosive limit, and percent oxygen and for particulates using a personal data RAM (PDR) unit.

On Tuesday, 5/18/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS continued collecting waste containers and empty containers throughout Building 1 and placing them in the appropriate container segregation/staging areas utilizing Level C PPE.
- ERRS completed the collection of all waste and empty containers from the outside of Building 1 and placed the containers in the appropriate container staging areas.
- EPA/START provided breathing zone air monitoring support during work activities using a Multirae PID to monitor for volatile organic compounds (VOCs), carbon monoxide, hydrogen sulfide, lower explosive limit, and percent oxygen and for particulates using a personal data RAM (PDR) unit.

On Wednesday, 5/19/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS continued collecting waste containers and empty containers throughout Building 1 and placing them in the appropriate container segregation/staging areas utilizing Level C PPE.
- EPA/START provided breathing zone air monitoring support during work activities using a Multirae PID to monitor for VOCs, carbon monoxide, hydrogen sulfide, lower explosive limit, and percent oxygen and for particulates using a PDR unit.
- A health and safety audit was conducted at the site to evaluate site work activities and the health and safety protocols utilized at the site. Also, as part of the health and safety audit, EPA used two Gillian personal air sampling pumps to collect worker exposure air samples on two ERRS personnel in the work zone to evaluate worker exposure to site contaminants.

On Thursday, 5/20/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS lab-pack chemist completed the final segregation of all containers in the waste container staging area in preparation for waste characterization sampling.
- ERRS used flex bins, and new drums to containerize flammable known liquids, oil, and aerosol/paint cans into the appropriate containers for waste disposal.
- EPA/START provided breathing zone air monitoring support during work activities using a Multirae PID to monitor for VOCs, carbon monoxide, hydrogen sulfide, lower explosive limit, and percent oxygen and for particulates using a PDR unit.
- ERRS completed collecting waste containers and empty containers throughout Building 1. All containers were placed in the appropriate container segregation/staging areas utilizing Level C PPE.

On Friday, 5/21/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS completed hazardous waste characterization sampling in the waste container staging area in Building 1 in preparation for final disposal utilizing Level B PPE.
- ERRS started crushing empty drums, and cutting small empty plastic containers in preparation for final disposal utilizing Level C PPE.

- EPA/START provided breathing zone air monitoring support during work activities using a MulitRae PID to monitor for VOCs, carbon monoxide, hydrogen sulfide, lower explosive limit, and percent oxygen and for particulates using a PDR unit utilizing Level B and Level C PPE.

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.

<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

Anticipated activities for the week of May 24, 2010 include

- Continue hazardous waste characterization activities;
- Excavation of contaminated soil east of the building; and
- Removal of contaminated foundry sand piles within the building.

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

Mick 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

Rick Sauve, 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