

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Removal 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: 6/4/2010

Reporting Period: 6/1/10 - 6/4/10

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 Tuesday, 6/01/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS continued cutting up small plastic containers and crushing drums and totes in preparation for disposal utilizing Level C PPE.
- ERRS removed the remainder of the foundry sand from Building 1 and placed it in a 10 cubic yard roll-off box for disposal and filled another 10 cubic yard roll-off with refractory solids (boron oxide) material from Building 1.
- ERRS shipped offsite two 10 cubic yard roll-offs full of foundry sand from Building 1 for disposal.
- EPA/START provided breathing zone air monitoring support during work activities using a MulitRae 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, 6/02/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS conducted drum, transformer, and tote pump out of all non-hazardous waste oil/water liquid for disposal offsite utilizing a vac. truck from EQ Services in Detroit, Michigan utilizing Level C PPE. A total of 32 drums, 2 totes, and 3 transformers were vacuumed out during this activity.
- Procured a well repair technician for the sampling of the onsite residential well.
- Crushed non-hazardous drums and containers and placed in a 30 cubic yard roll-off for disposal.
- EPA/START provided breathing zone air monitoring support during work activities using a MulitRae 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 Thursday, 6/03/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS excavated another 3 bags of foundry sand from the hillside area on the east side of the site and placed the material in a 10 cubic yard roll-off for disposal.
- ERRS shipped offsite two 10 cubic yard roll-off boxes with one containing refractory materials from Building 1 and the other containing soil and bagged foundry sand material from the hillside along the east side of the site.
- ERRS over packed 4 drums of hazardous waste (2 drums of caustic liquids, and 2 drums of flammable liquids) in preparation for waste disposal. ERRS personnel were in Level C PPE during this activity.
- START collected two surface soil confirmation samples for RCRA 8 Metals from the foundry sand bag area on the hillside along the east side of the site.
- START collected one drinking water sample from the onsite residential water well for RCRA 8 Metals.
- U.S. EPA and ERRS conducted site walk-through to confirm work was completed according to the work plan for the site.

On Friday, 6/04/10 the following response actions were undertaken at the site by the ERRS contractors:

- ERRS started demobilization activities including disconnecting site power, collecting all equipment used

during the removal, and securing the site.

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

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous crushed drums and containers	Solids/Soil	2 (30 cubic yard roll-off boxes)	Pending	Landfill	C & C Landfill, Marshall, MI
Non-hazardous oil/water liquids	Liquid	2,332 gals.	007161244JJK	Liquid Recycling	EQ Detroit, MI
Non-hazardous solids (refractory material) and bagged foundry sand	Solids	3 (10 cubic yard roll-offs) 25 tons (est.)	Pending	Landfill	C & C Landfill, Marshall, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Anticipated activities for the week of June 7, 2010 include:

- Demobilize site trailers from the site.

2.2.1.1 Planned Response Activities

N/A

2.2.1.2 Next Steps

- Demobilize site trailers from the site
- Dispose of hazardous waste containers from the site and hand over site keys to the county.

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

Shelly Lam, U.S. EPA

John Behrens, Environmental Restoration, LLC

Rich Fellores, Environmental Restoration, LLC

Kellie Lippner, 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