

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pickens Plating - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Pickens Plating
MIN000510460
Albion, MI
Latitude: 42.2521035 Longitude: -84.7757838

To: Gregg Brettmann, MDNRE
Carol Ropski, U.S. EPA

From: Jeff Lippert, OSC

Date: 10/22/2010

Reporting Period: 10/18/2010 to 10/22/2010

1. Introduction

1.1 Background

Site Number:	B5XE	Contract Number:	
D.O. Number:		Action Memo Date:	9/2/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/12/2010	Start Date:	10/12/2010
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510460	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:	N/A	Reimbursable Account #:	N/A

1.1.1 Incident Category

Time Critical Removal Action per request of the City of Albion and Calhoun County, Michigan.

1.1.2 Site Description

The Site consists of a 4-acre parcel bordered by industrial properties to the south and west, wooded and open land to the north, agricultural land to the east, and residential properties to the northeast. The Site is the former location of Pickens Plating, an electroplating business specializing in zinc plating. The Site includes one main building with multiple additions.

1.1.2.1 Location

The Site is located at 1000 Industrial Boulevard in Albion, Calhoun County, Michigan, 49224, in a mixed residential/industrial/agricultural area. Coordinates for the Site are 42.2551 degrees north and -84.7753 degrees west.

1.1.2.2 Description of Threat

The building at the Site was found to contain uncontrolled hazardous wastes (containers labeled chromic acid, nitric acid, sodium hydroxide, hydrogen peroxide, and hydrofluoric acid). Numerous vats, drums, and small containers of various sizes were found opened and unlabeled both inside the buildings and around the grounds. U.S. EPA quantified containers on-site that could potentially contain over 100,000 gallons of uncontrolled and unidentified liquid wastes. Four waste liquid samples were collected yielding pH results that are characteristically hazardous or TCLP levels that are characteristically toxic. The site has over 40 open vats of plating chemicals that had pHs which are considered characteristically hazardous.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

U.S. EPA conducted an assessment at the Site on June 4, 2010. The site assessment entailed the collection of four liquid samples and one solid sample. Both the solid and liquid samples were analyzed for pH. Corrosive substances in drums, containers and vats were sampled and returned with pHs as low as 0.8 standard units (su) and as high as 12.5 su. Both levels are considered characteristically hazardous. Numerous drums labeled "hydrofluoric acid" were also present in the building. These drums were not

opened during the Site Assessment due to the extreme hazard they present for inhalation and skin absorption. Fumes from stainless steel drums labeled as "nitric acid" produced a pH of 0.0 su on field equipment.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 2, 2010 the Action Memo was approved to expend up to \$1,039,042 to conduct a time-critical removal action at the Pickens Plating Site. Corrosive substances in drums, containers and vats were sampled and returned with pHs as low as 0.8 standard units (su) and as high as 12.5 su. Both levels are considered characteristically hazardous. Numerous drums labeled "hydrofluoric acid" were also present in the building. These drums were not opened during the Site Assessment due to the extreme hazard they present for inhalation and skin adsorption. Fumes from stainless steel drums labeled as "nitric acid" produced a pH of 0.0 su on field equipment. The site has over 40 open vats of plating chemicals that had pHs which considered characteristically hazardous.

The floors of the building were in poor condition and showed numerous signs of chemical spills. Staining on the floor indicated years of waste accumulation from general operation and poor house keeping on-site.

The building is unwatched and fairly secluded with no perimeter fencing to keep out prospective vandals and scavengers. Leaks in the roof in many locations will lead to premature corrosion of containers within the building, increasing the chance for a release of these substances. The rain water from the leaky roof also has the potential to enter open-top acid vats and react, causing an airborne vapor release.

2.1.2 Response Actions to Date

On 10/18/2010, ERRS continued to clear space for a drum staging area by cutting RCRA empty drums and containers and placing the carcasses in a roll-off box for disposal. ERRS also removed any metal debris that was inhibiting clear access to drums, vats, and other containers. Metal debris was placed in a separate roll-off box for recycling. One load of scrap metal was hauled off site, and a replacement roll-off box was left on site. ERRS also mobilized a hazard characterization (haz cat) chemist and began to set up a laboratory hood, tables, and staging area for haz catting contents of full and partially full containers.

On 10/19/2010, ERRS continued cutting RCRA empty drums and other non-metal debris and placing it in a roll-off box for disposal at C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling. One load of RCRA empty drums and debris was hauled off site to be disposed of at C&C Landfill in Marshall, Michigan. ERRS began haz catting small containers from the laboratory area. ERRS started and tested the supplied air trailer. Phone and Internet service was established in the office trailers, and a windsock was installed.

On 10/20/2010, ERRS hazcatted approximately 50 small containers from the laboratory area. ERRS continued cutting RCRA empty drums and other non-metal debris and placing it in a roll-off box for disposal at a C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling. One load of scrap metal was hauled off-site, and a replacement roll-off box was left on-site.

On 10/21/2010, ERRS completed hazcatting the laboratory chemicals and continued cutting RCRA empty drums and scrap metal. ERRS continued cutting RCRA empty drums and other non-metal debris and placing it in a roll-off box for disposal at C&C Landfill in Marshall, Michigan. Metal debris was placed in a separate roll-off box for recycling.

On 10/22/2010, ERRS started sampling and hazcatting non-laboratory small containers. The supplied air trailer was used by the samplers. The RCRA empty drums/debris roll-off box was hauled off site to C&C Landfill in Marshall, Michigan, and the scrap metal box was removed and transported for recycling. Replacements were left for both.

Throughout the week, USCG performed health and safety oversight and conducted work zone air monitoring with a MultiRae. No readings elevated above background were reported and no safety incidents were noted.

START monitored the air around the perimeter of the facility with AreaRaes. HCN sensors were installed in the units, and they were operated while ERRS was in the work zone. No readings elevated above background were recorded. START also developed a field sampling plan for sampling that will occur during the first week of November 2010. START developed a Site Contingency Plan that was posted in office trailers and the two facility emergency exits. START also continued documentation and file keeping.

A reporter from the Battle Creek Enquirer was on-site on 10/20/2010. A front page news story was published in the Battle Creek Enquirer on 10/21/10 regarding the Removal Action at the Site.

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

The title search report and information obtained from Calhoun County indicate that the current owner of the Site is the Calhoun County Treasurer's Office. U.S. EPA will obtain an appraisal of the property to ascertain its value. Depending on the value of the property (and whether Calhoun County has Bona Fide Prospective Purchaser (BFPP) status under CERCLA), U.S. EPA may place a lien on the property, pursuant to CERCLA sections 107(1) or 107(r). A 104(e) information request may also be sent to a representative of the dissolved corporation, to discover whether assets were transferred from the corporation within the clawback period established by relevant Michigan law. If substantial assets were transferred from the corporation within the clawback period, U.S. EPA will attempt to capture those assets to offset the costs of the response action.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
RCRA Empty Containers and General Debris	Solid	30 CY	0057		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0059		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0058		C&C Landfill
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40CY	N/A	Recycled	

2.2 Planning Section

2.2.1 Anticipated Activities

- Continue RCRA empty container disposal;
- Continue debris removal;
- Begin full and partially full container inventory;
- Distribute fact sheet to local community;
- Continue Hazard Characterization of on-site containers.

2.2.1.1 Planned Response Activities

- Inventory and perform hazard characterization, in compliance with a site-specific QA/QC. Plan, on all substances contained in containers, drums, and vats;
- Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- Dismantle and/or decontaminate contaminated structures as necessary;
- Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR §300.440).
- Decontaminate or remove highly contaminated facility flooring.
- Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps

N/A

2.2.2 Issues

Wildlife that has inhabited portions of the Site building.

2.3 Logistics Section

Not applicable

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

U.S. EPA, Jeff Lippert, OSC

2.6 Liaison Officer

Not applicable

2.7 Information Officer

2.7.1 Public Information Officer

Jayna Legg

2.7.2 Community Involvement Coordinator

Janet Pope

3. Participating Entities

3.1 Unified Command

Not Applicable.

3.2 Cooperating Agencies

City of Albion Public Services

City of Albion Economic Development Corporation

Calhoun County Treasurer's Office

Michigan Department of Natural Resources and Environment

U.S. Coast Guard

U.S. EPA

4. Personnel On Site

Jeff Lippert, U.S. EPA

John Rogers, U.S. EPA

Darrel Boyles, U.S. Coast Guard

Andy Johnson, U.S. Coast Guard

Jay Rauh, Weston START

Eric Bowman, EQM

Robert Bowman, EQM

Anne Bowling, EQM

Ellis Thigpen, Inland Waters of Ohio

Jospeh Sherbert, Inland Waters of Ohio

Corey Evans, Inland Waters of Ohio

Antwayne Brown, Inland Waters of Ohio

5. Definition of Terms

U.S. EPA - United States Environmental Protection Agency

USCG - United States Coast Guard

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