

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #5  
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:** 11/15/2010

**Reporting Period:** 11/8/10 - 11/12/10

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B5XE	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/2/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/12/2010	<b>Start Date:</b>	10/12/2010
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MIN000510460	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>	N/A	<b>Reimbursable Account #:</b>	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 11/8/2010, 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. ERRS completed bulking neutral liquids and oxidizers.

On 11/9/2010, ERRS completed bulking of flammables and paint waste. ERRS collected samples of bulked waste streams for disposal. Samples collected were of acids, bases, flammables, paint waste, neutrals and oxidizers. ERRS cut RCRA-empty containers in half and placed them 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 11/10/2010, ERRS conducted general Site cleaning and preparation for demobe on 11/12/10. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items 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.

On 11/11/2010, ERRS conducted general Site cleaning and preparation for demobe on 11/12/10. ERRS continued cutting RCRA empty drums and other non-metal debris and placing these items 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 roll-off box of RCRA empty containers was transported to C&C Landfill in Marshall, Michigan for disposal.

On 11/12/2010, ERRS conducted general Site cleaning and continued cutting RCRA empty drums and other non-metal debris and placing these items 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 scrap metal roll-off box was taken off-site for recycling and an empty roll-off was left in its place. ERRS, USCG and U.S. EPA demobilized from Site to await waste stream sampling results, waste profiles, and disposal approval. Crew will remobilize on 11/29/10, once the approval process is complete.

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.

USCG also monitored the air around the perimeter of the facility with AreaRaes. HCN sensors, installed in the Area Raes, were used to monitor for cyanide while ERRS was in the work zone. No readings elevated above background were recorded.

#### **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

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
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
RCRA Empty Containers and General Debris	Solid	30 CY	0060		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0061		C&C Landfill
RCRA Empty Containers and General Debris	Solid	30 CY	0068		C&C Landfill
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	
Scrap Metal	Solid	40 CY	N/A	Recycled	

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

- a) Site will be shut down for two weeks to await final approval for disposal;
- b) Remobilize on 11/29/10;
- c) Conduct transportation and disposal of approved waste streams;
- d) Begin dismantling plating lines and other large containers;
- d) Distribute fact sheet to local community.

#### 2.2.1.1 Planned Response Activities

- a) Inventory and perform hazard characterization, in compliance with a site-specific QA/QC Plan, on all substances contained in containers, drums, and vats;
- b) Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- c) Dismantle and/or decontaminate contaminated structures as necessary;
- d) 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).
- e) Decontaminate or remove highly contaminated facility flooring.
- f) 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. Environmental Protection Agency

### **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

Steve Sturgeon, 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