

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Thursday, July 15, 2004

From: Bradley Benning

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Subject: Enforcement Removal Action
LaSalle Rolling Mill
1375 9th Street, LaSalle, IL
Latitude: 41.3378000
Longitude: -89.0883000

POLREP No.:	1	Site #:	B5T6
Reporting Period:		D.O. #:	N/A
Start Date:	9/4/2003	Response Authority:	CERCLA
Mob Date:	9/4/2003	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ILN000508129	Contract #	N/A
RCRIS ID #:			

Site Description

The property is located at 1375 9th Street in LaSalle, LaSalle County, Illinois. Coordinates for the site are latitude 41 degrees 20' 16" North and longitude 89 degrees 05' 18" West. It is located in an industrial/residential neighborhood, with approximately 895 residents living within one half mile of the site. The Vermilion River is approximately 1000 feet east of the site.

The property known as LaSalle Rolling Mill operated as a metal forming and rolling facility. The facility had been under contract to the U. S. Mint to generate metal blanks for pennies, which required copper plating onto zinc blanks. The facility occupied approximately 12 acres with one main building which contained two furnaces, rolling mill, copper plating line and associated treatment operation, laboratory, warehouse area, and offices. Several storage tanks are located outside which are used for the storage of mill oil and spent plating solution. Although the tanks appeared to have secondary containment, oil staining was present in numerous locations on the west side of the facility. A past spill of mill oil had occurred at the facility and the contaminated soils generated from the remediation were still stored on site. The site is fenced and randomly inspected by the owner.

Current Activities

U.S. EPA conducted an inspection at the closed LaSalle Rolling Mill facility on August 22, 2000. The purpose of the inspection was to accompany officials from the U.S. Mint and Federal Bureau of Investigation (FBI), which were investigating the status of raw materials (copper and zinc) owned by the U.S. Government that may have been abandoned due to the Chapter 7 Bankruptcy. U.S. EPA had been requested to join the inspection to assess any environmental concerns as a copper cyanide plating process had been used at the facility. The facility was preparing for a liquidation sale at the time of the inspection and a general walk-through of the facility identified the following areas of concern: 1) Copper plating line consisting of more than 20 vats which utilized potassium cyanide and acid rinses; 2) Wastewater treatment area consisting of numerous tanks and filter presses, including one tank that was observed to contain 900 gallons of spent cyanide solution; 3) Drum storage area with 64 containers of F006/F008 waste; 4) Unused product remaining on site including 15 containers of potassium cyanide solids and solutions, 21 containers of acids, 12 containers of oxidizers, 4 containers of flammable liquids, and 16 containers of used oil; 5) Numerous small containers which apparently were consolidated from throughout the facility; 6) Laboratory which contained hundreds of small reagent bottles of chemicals; 7) Several outside storage tanks with at least 6 containing mill oil, and 1 containing approximately 15,000 gallons of weak cyanide solution; 8) Insulation, which appeared to be asbestos was observed on piping and an old steam engine.

U.S. EPA has been working with the owner and his consultant to address the problems remaining at the site since the bankruptcy and liquidation of assets. The owner has removed the drums containing the F006/F008 waste, and is in the process of removing the plating line. The owner is attempting to reopen

the mill for limited use and would like to lease out the east portion of the building for warehouse storage. Due to the nature of the hazardous substances still remaining on site the U. S. EPA would prefer to monitor the cleanup activities pursuant to an Administrative Order of Consent (AOC).

The Illinois EPA has been inspecting the facility due to its regulatory status as a RCRA Generator. After the facility closed the Illinois EPA required the site to go through closure as waste had been stored longer than 90 days on site. The facility failed to submit a closure plan and Illinois EPA referred the site to U.S. EPA for enforcement action. Due to the bankruptcy and lack of assets that were no longer available to the RCRA program, the Site was referred to the Superfund program. The State remains interested in the site to ensure its closure requirements are addressed under any proposed cleanup plan. Based on current information the local authorities have taken no action at the site.

Planned Removal Actions

There are obvious time-critical elements present at the Site. The hazardous substances are located in an unsecured site, with signs of public trespass, located near industrial and residential areas, and must be immediately addressed. The proposed removal actions at the Site would eliminate the imminent and substantial threats to human health, welfare, or the environment, as outlined in this memorandum.

The AOC requires the RP to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a site-specific workplan including a proposed timeline;
2. Develop and implement a site-specific health and safety plan;
3. Provide site security measures which may include, but not be limited to, security guard service, fencing, and board-up services;
4. Stage, sample, and secure all site wastes and residual materials, including but not limited to, wastes and materials in or from:
 - a. All tanks, 55-gallon drums and small containers;
 - b. Pits, sumps, vats, piping, and bags;
 - c. Debris and soil;
 - d. Friable asbestos from pipe wrap and other sources that is loose or fallen to the ground.
5. Overpack and secure leaking and deteriorated drums and other containers;
6. Conduct compatibility tests on liquids, sludges, solids, and other hazardous wastes and substances;
7. Bulk and consolidate waste for off-site disposal;
8. Evaluate soils and debris, and determine appropriate methods for stabilization and/or disposal, if necessary;
9. Arrange and effect transportation and disposal of all hazardous wastes, pollutants, and contaminants at an EPA-approved disposal facility;
10. Decontaminate and/or dispose of all scrap metal and other debris, as appropriate;
11. Decontaminate as necessary, facility equipment and structures;
12. Conduct confirmation sampling, as appropriate, to ensure contaminant levels have been reduced to an acceptable level;
13. Reuse, recycling of any waste, residual materials, and equipment will require approval by U. S. EPA;
14. Verify compliance with all NESHAP requirements for asbestos related issues;
15. Verify compliance with the SPCC requirements pursuant to 40 CFR 112, due to the oil storage capacity on-site in excess of 1320 gallons.
16. Performing other actions to investigate contamination on the property that U.S. EPA may determine to be necessary;

Next Steps

The consultant for the site has been working on waste characterization and profiling, but no field work has occurred to date.

Key Issues

The RP has a deadline of September 4, 2004, to complete all removal work as specified in the AOC.

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