

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Modern Packaging - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial and Final
Modern Packaging
B5XB
Monroe, MI
Latitude: 41.9290626 Longitude: -83.4091333

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From: Jeffrey Kimble, OSC
Date: 6/20/2011
Reporting Period: October 2010 - June 2011

1. Introduction

1.1 Background

Site Number:	B5XB	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	10/17/2010
Demob Date:		Completion Date:	6/20/2011
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

PRP - Voluntary removal action

1.1.2 Site Description

The Site is located in a mixed commercial/residential area with residential neighborhoods situated directly east and west of the property. A beverage distribution center operates the property to the north of the Site. A concrete-lined drainage ditch runs along the east side of the property, parallel to railroad tracks, and runs south/southwest 0.6 miles before exiting directly into the upper Raisin River and eventually out to Lake Erie.

1.1.2.1 Location

The Site is located at 504 Huber Drive, Monroe, Monroe County, Michigan 48162.

1.1.2.2 Description of Threat

These threats are from the Site Action Memorandum which was written for the site but never finalized due to the voluntary PRP cleanup.

1. Actual or potential exposure of nearby human populations, animals, or the food chain to hazardous substances or pollutants or contaminants

The site is located in mixed industrial/residential with neighborhoods located directly east and west of the Site. The former Modern Packaging Site currently remains vacant therefore a risk to workers is not present. However, the risk of trespassers entering the property remains high. Several breaches in the fences surrounding the site have been identified and large broken exterior windows allow access points for people who may want to enter the site buildings. Graffiti documented within the buildings suggest that trespassing has already taken place. Further unrestricted access onto the Site could result in an accidental or intentional release of hazardous material. The close proximity of residences and other vulnerable areas immediately surrounding the Site would greatly increase the likelihood of human health and environmental impacts, should exposure occur.

Although the drums and containers of material are located inside the Site building, they do not have secondary containment measures in place and the building has many access points and shows signs of continuous activity. Local officials have told U.S. EPA that it is teenagers (minors) continually breaching the building. Results for samples collected during the Site assessment indicate that characteristically hazardous waste is in fact present in drums (samples MOD-WL02-060210, MOD-WL03-060210, MOD-WL04-060210, and MOD-WS01-060210) and potentially in other containers not sampled. There are numerous drums and containers on site that were not sampled, but were counted, and many of these may contain ignitable or other wastes. Some containers currently have unsecured lids and/or show signs of leaking, rupture, and spillage. The U.S. EPA and START documented rain water leaking through the roof of the Site building and in the vicinity of the stored drums and containers. Water is accumulating on the floors and has created an environment suitable for rapid drum and container deterioration. Contaminants from leaking drums and containers may flow unimpeded throughout the Site and into storm sewers systems or the nearby drainage ditch located on the east side of the property. Potential exposure could occur through any of these migration pathways and cause imminent endangerment to human health and the environment.

Also, there was historic information of buried drums discovered on site, and to U.S. EPA's knowledge, no complete extent of contamination survey has been completed at the Site.

2. Actual or potential contamination of drinking water supplies or sensitive ecosystems

The storage of drums and containers of potentially hazardous materials inside the Site building, under a leaking roof, and with no secondary containment are such that drinking water and sensitive ecosystems may be affected. U.S. EPA documented rain water leaking through the roof of the Site buildings. Contaminants may flow unimpeded throughout the Site and into storm sewer systems or the nearby drainage ditch, as outlined above. The concrete drainage ditch drains south/southeast 0.6 miles before exiting directly into the upper River Raisin and eventually flowing downriver 4.5 miles to Lake Erie. Pollutants that enter lakes and rivers can be retained for long periods of time and negatively impact sensitive ecosystems. A large volume of printer inks in 1 to 5 gallon containers were on site, and many of these carried health warnings (although not specifically hazardous wastes). These pollutants and contaminants could impact human health, and may impact water quality of the River Raisin and damage natural resources, if water inundates the building and these contaminants are carried to the drainage ditch. A fire resulting from the ignition of the large amount of D001 wastes on site and subsequent fire fighting activities would lead to this exact scenario.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release

During the site assessment, numerous drums, containers, and buckets of waste materials were documented throughout the buildings on Site. Several of the drums and small containers were beginning to show signs of deterioration and/or leaking, rupture, and spillage. Further deterioration of the drums may allow additional quantities of hazardous substances to migrate into the environment. Many of the drums were labeled as hazardous materials (corrosive and flammable) and analytical sampling results confirmed the presence of hazardous wastes. Trespassing on Site could result in an accidental or intentional release of hazardous material, and/or contact with hazardous materials. The close proximity of the Site to residences and other vulnerable areas greatly increases the potential threats to human health and environment, should such an occurrence take place.

4. Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released

The city of Monroe, MI receives approximately 32.7 inches of precipitation annually, with rain and snow fall fairly evenly distributed throughout the year. Weather conditions will continue to contribute to the deterioration of the buildings on Site, and precipitation will continue to cause damage to drums and containers given the confirmed structural problems with the site buildings.

5. Threat of fire or explosion

Despite the fact that it appears electrical power has been shut off to the main building on Site, there is a severe threat of fire or explosion due to the materials stored on Site and potential trespassing activities and it has been confirmed that 440 eV power is still feeding 1/3 of the facility. If a fire were to occur at the facility, it would likely produce toxic gases, irritants, acidic smoke, and contaminated fire-water runoff. The presence of numerous drums and containers containing flammable or potentially flammable liquids combined with stacks of cardboard and wood-pallets further increases the chance of accidental or intentional ignition of a fire within the buildings. Local officials have documented numerous break-ins at the property. Container labels on several drums indicated that some materials on Site were flammable and analytical results of three samples confirmed the presence of a significant volume of flammable liquids in abandoned containers on Site.

6. The availability of other appropriate federal or state response mechanisms to respond to the release

Monroe County requested assistance from U.S. EPA to perform a site assessment and cleanup activities, which documents the need for federal involvement to address imminent endangerment posed by the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On December 6, 2007 a Phase I Environmental Site Assessment (ESA) report was completed by Huron Consultants of Madison Heights, MI. The report documents that the Site was originally developed prior to 1929 and used in the manufacture of automotive panels. The Site continued as an industrial manufacturing property, doing business under names Barrett Products and Woodall Industries. Superior Container Inc. and, most recently, Modern Packaging Corporation operated industrial plants at the Site from 1985 to 2004. Modern Packaging Corporation was a manufacturer of folding paper cartons for a variety of consumer goods such as children toys, automotive parts, food goods, and soaps/detergents. Operations ceased in 2004 and the Site now sits abandoned as a tax reverted property.

According to Huron Consultants' ESA report, "Since at least 1929, the site operations involved the use, storage, and/or handling of petroleum products and/or hazardous materials. Historical property usage of the site identified AST and UST systems storing lacquer, oil, and/or thinner, as well as the use of paints, coatings, and solvents on the property during historical operations. In addition, historical documentation provides evidence of improper waste practices, including the discovery of approximately 300 buried drums at the site and documented hazardous waste complaint (discharge of waste to the ground surface)".

On February 22, 2008 a Hazardous Materials Identification Survey Report was completed by Huron Consultants. The report identifies the presence of hazardous materials at the Site, which include but are not limited to; pipe insulation and floor tiles containing friable and non-friable asbestos, lead based paints, mercury switches and thermostats, chlorofluorocarbon (CFC) containing material, and poly-chlorinated biphenyl (PCB) ballasts.

In May 2010, Monroe County, MI requested assistance from the U.S. EPA in performing a site assessment to evaluate potential threats to human health and the environment posed by the Site and provided EPA with the historical background information on the site.

On June 2nd, 2010, EPA conducted a site assessment of the facility. General observations made by EPA were that access to the site was achievable via unlocked doors and holes cut in perimeter fencing. Graffiti, assumed from area youth, was observed inside the building and recent evidence of activity (pop cans, trash, etc) was observed. Water was leaking into the building from several areas of the roof, and several windows had been broken out of the building as well.

As part of the assessment, five liquid samples and one solid sample from presumed wastes on Site were collected for laboratory analysis. Sampling locations were selected based on visual field observations and were chosen to be representative of areas posing potential risk to human health and the environment. The sample identification numbers were as follows:

MOD-WL01-060210 from a 55-gallon poly drum labeled as "waste oil", located in the Site drum storage area
MOD-WL02-060210 from a 55-gallon poly drum labeled "waste coatings", located in the Site drum storage area
MOD-WL03-060210 from a 55-gallon steel drum labeled "Isopropyl alcohol", located in the flammables storage room
MOD-WL04-060210 from a 55-gallon steel drum labeled "paint related material", located in the flammables storage room
MOD-WL05-060210 from a 5-gallon poly container labeled as "Kodak polychrome – plate prebake solution", located in the main manufacturing area
MOD-WS01-060210 from a grey/white insulation material removed from an overhead pipe located in the main manufacturing area

Analytical results received from these samples were compared to Title 40 of the Code of Federal Regulations (40 CFR) Part 261 Resource Conservation and Recovery Act (RCRA) limits for determining characteristics of hazardous waste. According to 40 CFR, Part 261.2, a solid waste is considered a hazardous waste if it exhibits any of the characteristics of ignitability, corrosivity, toxicity, or reactivity. Although contaminants were observed in all samples collected, the following results specifically exhibited

hazardous waste criteria:

Sample MOD-WL02-060210 showed a flashpoint value of 75 degrees Fahrenheit (°F). According to 40 CFR 262(a)(1), a liquid having a flashpoint value of less than 140 °F exhibits the characteristic of ignitability. Therefore, the material associated with sample MOD-WL02-060210 is defined as a hazardous waste.

Sample MOD-WL03-060210 showed a flashpoint value of 60 °F . According to 40 CFR 262(a)(1), a liquid having a flashpoint value of less than 140 °F exhibits the characteristic of ignitability. Therefore, the material associated with sample MOD-WL03-060210 is defined as a hazardous waste.

Sample MOD-WL04-060210 showed a flashpoint value of < 60 °F. According to 40 CFR 262(a)(1), a liquid having a flashpoint value of less than 140 °F exhibits the characteristic of ignitability. Therefore, the material associated with sample MOD-WL04-060210 is defined as a hazardous waste.

Sample MOD-WS01-060210 showed a percentage asbestos value of 75 % Chrysotile. According to Appendix A, Subpart F, 40 CFR 763 Section 1, a material containing >1% asbestos is considered hazardous. Therefore, the material associated with sample MOD-WS01-060210 is defined as a hazardous waste.

The building remains only partially secured and trespassing is an ongoing concern. Additionally, the property was tax reverted and the County of Monroe was required to offer it for sale in public auction. A buyer was found, and that entity agreed to conduct a PRP voluntary cleanup.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Modern Packaging Site was a defunct business that had produced cardboard boxes while in operations. The property reverted to Monroe County through tax reversions, and subsequently the county requested assistance from U.S. EPA.

U.S. EPA conducted an assessment of the property in 2010, and initiated the documentation of threats and writing the decision document for the site.

However, an interested party bought the property at auction and informed the county and U.S. EPA they were going to conduct a voluntary cleanup. The new owner did not wish to enter into an Consent Agreement with U.S. EPA.

The voluntary work has been completed, and U.S. EPA has visited the site to confirm. Records of waste disposition and an asbestos abatement were provided to U.S. EPA.

2.1.2 Response Actions to Date

From 10/21/2010 through 2/11/2011, the PRP conducted voluntary cleanup actions at the site. These consisted of removing the drums and other containers identified by U.S. EPA during the site assessment activities in 2010. Additionally, the PRP conducted certain asbestos abatement activities and provided U.S. EPA with paperwork documenting their compliance with NESHAPs.

All planned removal actions as contemplated by U.S. EPA have been completed by the PRP.

On June 20, 2011, U.S. EPA OSC visited the site and verified no waste containers were observed. Also, the OSC documented road improvements and new locks placed on a facility gate.

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

U.S. EPA investigated the former property owners but has not finalized any enforcement proceedings due to the new owners involvement and voluntary cleanup actions taken.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Used Oil	liquid	7300 gallons	004223669		recycle
propane	compressed gas	15 pounds	004223669		ERG, Livonia, MI
non-haz materials	various	3360 pounds	004223669		ERG

UN1217, Isopropyl Alcohol	liquid	700pounds	004223669		ERG
UN 1993, Flammable Liquid	liquid	900 pounds	004223669		ERG
Haz Waste Liquid, chromium	liquid	4100 pounds	004223670		EQ Detroit
UN 1993, Flammable Liquid	liquid	850 pounds	004223670		EQ Detroit
UN, 3266, waste corrosive liquid, base	liquid	125 pounds	004223670		EQ Detroit
UN 3082, Haz waste liquid, cadmium	liquid	75 pounds	004223670		EQ Detroit
UN 3266, Waste corrosive liquid, sodium hydroxide	liquid	200 pounds	004223670		EQ Detroit

2.2 Planning Section

2.2.1 Anticipated Activities

No further actions.

2.2.1.1 Planned Response Activities

No further actions.

2.2.1.2 Next Steps

No U.S. EPA next steps. Actions complete.

2.2.2 Issues

None. A voluntary cleanup was conducted.

2.3 Logistics Section

N/A

2.4 Finance Section

2.4.1 Narrative

No costs other than assessment activities.

2.5 Other Command Staff

2.5.1 Safety Officer

2.6 Liaison Officer

The OSC liasoned with the new owner.

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Monroe County Treasurers Office

4. Personnel On Site

N/A

5. Definition of Terms

PRP = Potentially Responsible Party

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

None, items complete.

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 6/23/2011