

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lyndon Street Drums - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Time Critical Removal Action Continues
Lyndon Street Drums
C566
Detroit, MI
Latitude: 42.3955500 Longitude: -83.1502640

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From: Jeffrey Lippert, On-Scene Coordinator
Date: 11/19/2011
Reporting Period: 11/14/2011 - 11/19/2011

1. Introduction

1.1 Background

Site Number:	C566	Contract Number:	
D.O. Number:		Action Memo Date:	9/14/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/18/2011	Start Date:	10/24/2011
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510622	RCRIS ID:	
ERNS No.:		State Notification:	08/18/2011
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Began as an emergency response on August 18, 2011 and is now a time-critical removal that began on October 24, 2011.

1.1.2 Site Description

The site is the abandoned laboratory of Riverside Organics, Inc. The site is bordered by Lyndon Street and commercial and industrial properties to the south, a vacant lot and commercial and industrial properties to the

west, residential homes to the north, and industrial and commercial properties to the east.

1.1.2.1 Location

It is located at 8100 Lyndon Street, Detroit, Wayne County, Michigan 48238.

1.1.2.2 Description of Threat

U.S. EPA was contacted by the Detroit Fire Department (DFD) on August 18, 2011 regarding hundreds of drums and miscellaneous containers, many leaking, in an abandoned building at 8100 Lyndon Street, Detroit, Wayne County, Michigan 48238 (site). DFD requested assistance with securing the site and removal of the drums and containers.

U.S. EPA secured the building and leaking drums, collected samples and conducted air monitoring on August 18, 2011. No waste was disposed of during the emergency action, only securing of the site. Over 500 drums and containers exist inside the building in very poor condition. During the emergency response, U.S. EPA collected five waste liquid samples. All five samples were characteristically hazardous for either ignitability, corrosivity, or toxicity as defined by 40 C.F.R § 261.21, §261.22, or §261.24, respectively. All samples collected by U.S. EPA also contained various levels of cyanide, a CERCLA hazardous substance.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

U.S. EPA responded to the site on Thursday, August 18, 2011 at approximately 1400 hours. U.S. EPA confirmed the presence of hundreds of drums and containers at the site. Many were marked "Toxic", "Flammable", "Corrosive", "Poison", "Reactive", and "Dangerous When Wet", few were leaking and many are in poor condition.

Many containers are stacked on top of each other and incompatible wastes (containers labeled "oxidizer" and "corrosive") stored in close proximity of one another. VOC readings were over 500 ppm on two drums that were opened and sampled.

The building is in a state of disrepair. Holes in the roof are allowing rain water to infiltrate the building and contribute to the already unstable condition of drums and containers. There is no perimeter fencing and the building is open and unlocked.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

U.S. EPA was contacted by DFD on August 18, 2011 regarding hundreds of drums and miscellaneous containers, many leaking, in an abandoned building at 8100 Lyndon Street, Detroit, Wayne County, Michigan 48238. DFD requested assistance with securing the site and removal of the drums and containers.

U.S. EPA responded to the site on Thursday, August 18, 2011 at approximately 1400 hours. U.S. EPA confirmed the presence of hundreds of drums and containers at the Site. Many were marked "Toxic", "Flammable", "Corrosive", "Poison", "Reactive", and "Dangerous When Wet", many were leaking and in poor condition.

The building is in a state of disrepair. Holes in the roof are allowing rain water to infiltrate the building and contribute to the already unstable condition of drums and containers. There is no perimeter fencing and the building is open and unlocked.

U.S. EPA secured the wastes and the building and conducted air monitoring and drum sampling on August 18, 2011.

U.S. EPA remobilized to the site on October 24, 2011 and began the time-critical removal action.

2.1.2 Response Actions to Date

On Monday 11/14/11, U.S. EPA began Level B sampling activities of 55 gallon drums and 5-gallon pails and prepared for other stabilization activities to be conducted on 11-15-11. Additionally U.S. EPA continued roof maintenance activities to reduce the amount of precipitation entering the building.

On Tuesday 11/15/11, U.S. EPA in coordination with the Detroit Fire and Police Department secured the perimeter of the site during other stabilization activities. High hazard technicians conducted an assessment of three metal pails potentially containing explosive peroxide crystals. Assessment results indicated the three pails did not contain peroxide crystals and a water rinse was added to ensure peroxide crystals were not present. U.S. EPA completed the roof maintenance activities.

Wednesday 11/16/11, U.S. EPA continued Level B sampling activities of drums and pails, and set-up new decontamination area adjacent to the control reduction zone (CRZ).

Thursday 11/17/11, U.S. EPA continued level B sampling activities, completed set-up of new decontamination area, re-packed magnesium metal chips, overpacked 3 drums staged in the conex box on site and began venting (via slow release) of a thionyl chloride drum within an overpack in Level B PPE.

On Friday, 11/18/11, U.S. EPA overpacked a leaking and fuming thionyl chloride drum. U.S. EPA also shipped this drum and 25 others of highly hazardous and reactive wastes to Dynecol Inc and Petro-Chem Processing Group in Detroit, Michigan for disposal. Workers continued sampling containers for hazcatting.

On Saturday, 11/19/11, U.S. EPA continued sampling containers for hazard classification (HAZCAT) activities after the Thanksgiving break. With the site hazards greatly reduced by the removal of highly hazardous and reactive waste, the job site will be shut down the week of 11-21-11 for the Thanksgiving Holiday. Work will resume on Monday, 11/28/11.

During all removal activities, U.S. EPA monitored the air at the site perimeter utilizing AreaRAEs and a MultiRae, no action levels were exceeded.

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

The enforcement process is on-going.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Hazardous liquid (Hydrazine Hydrate)	gallons	55 g	008968929	H141	Dynecol, Inc Detroit, MI
Hazardous liquid (Thionyl Liquid)	gallons	55g	008968929	H141	Dynecol, Inc Detroit, MI
Hazardous liquid (Allyl Chloride)	pounds	40	009226931	H141	Petro-Chem Processing Group Detroit, MI
Hazardous liquid (Allyl Bromide)	pounds	60	009226931	H141	Petro-Chem Processing Group Detroit, MI
Hazardous liquid (Toulene, Sodium Dihydrobis (2-methoxyethoxy)Aluminate)	pounds	120	009226931	H141	Petro-Chem Processing Group Detroit, MI
Hazardous liquid (Hydrogen Peroxide)	pounds	30	009226931	H141	Petro-Chem Processing Group Detroit, MI
Hazardous liquid (Benzyl Chloride)	pounds	100	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Liquid (Methylmagnesium Chloride, Tetrahydrofuran)	pounds	60	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Liquid (Styrene Monomer)	pounds	50	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Liquid (Trimethylacetyl Chloride)	pounds	50	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Solid (Sodium Borohydride)	pounds	30	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Solid (Waste Magnesium Metal Chip)	pounds	140	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Liquid (Lithium Borohydride)	pounds	50	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Liquid (Sodium Hydride)	pounds	80	009226932	H141	Petro-Chem Processing Group Detroit, MI

Hazardous Solid (Benzoyl Peroxide)	pounds	30	009226932	H141	Petro-Chem Processing Group Detroit, MI
Hazardous Solid (Waste Sodium)	pounds	06	009226932	H141	Petro-Chem Processing Group Detroit, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Continue container sampling

Continue to identify and remove flammable chemicals

Continue segregating chemicals within the building

Begin hazard categorization (hazcatting) of collected samples

2.2.1.1 Planned Response Activities

Inventory containers

Sample containers;

Soil excavation;

Backfill; and

Off-site disposal.

2.2.1.2 Next Steps

Continue enforcement

2.2.2 Issues

None.

2.3 Logistics Section

Not Applicable.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$500,000.00	\$300,664.17	\$199,335.83	39.87%
TAT/START	\$25,000.00	\$22,000.00	\$3,000.00	12.00%
Intramural Costs				
Total Site Costs	\$525,000.00	\$322,664.17	\$202,335.83	38.54%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Bryan Mullins

2.6 Liaison Officer

Not Applicable.

2.7 Information Officer

None.

2.7.1 Public Information Officer

None.

2.7.2 Community Involvement Coordinator

None.

3. Participating Entities

3.1 Unified Command

Unified Command was not utilized.

3.2 Cooperating Agencies

Detroit Fire Department
Michigan Department of Environmental Quality
Detroit Environmental Affairs

4. Personnel On Site

U.S. EPA - 1
START - 1
ERRS - 7
USCG - 2

5. Definition of Terms

U.S. EPA - United States Environmental Protection Agency
ERRS - Emergency and Rapid Response Service
START - Superfund Technical Assessment and Response Team
DFD - Detroit Fire Department
C.F.R - Code of Federal Regulations
USCG - United States Coast Guard

6. Additional sources of information

6.1 Internet location of additional information/report

None.

6.2 Reporting Schedule

POLREPS will be issued weekly or as necessary.

7. Situational Reference Materials

None.

POLREP #5 Last Updated 12/5/2011