

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #6
Time Critical Removal Action Continues
Lyndon Street Drums
Pending
Detroit, MI
Latitude: 42.3955500 Longitude: -83.1502640

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From: Jeffrey Lippert, On-Scene Coordinator
Date: 12/5/2011
Reporting Period: 11/28/2011 - 12/02/2011

1. Introduction

1.1 Background

Site Number:	C566	Contract Number:	EP-S5-08-04
D.O. Number:	0039	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:	8/18/2011
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 11-28-11 - U.S. EPA re-packed a fuming sulfuryl chloride drum. Continued Level B sampling activities of 55-gallon drums within Room 'A', and conducted hazard categorization (hazcat) activities in combination with identification of unknown chemicals via the Ahura Defender.

On Tuesday 11-29-11 - U.S. EPA completed Level B sampling activities of 55-gallon drums within Room 'A' and proceeded to Rooms 'B' and 'C' along with the continuation of hazcat and Ahura identification.

Wednesday 11-30-11 - U.S. EPA completed Level B sampling within Room 'B' continued within Room 'C' and prepared to move drums from Building to conex box that have hazcat results. Hazcat and Ahura identification activities continue.

Thursday 12-01-11 - Continuation of Level B overpack activities within Room 'A' and transfer to Conex box. Preparation within Room 'A' for future lab pack activities.

Friday 12-02-11 - U.S. EPA identified an additional 30 containers containing mostly unknown liquids, all containers were sampled. U.S. EPA completed off-site disposal of approximately 20 gallons of waste sulfuryl chloride. Hazcat and Ahura identification activities continued. To date 316 samples have been obtained, 242 have been hazcatted and 110 have been identified with the Ahura defender.

During all response activities, U.S. EPA conducted air monitoring for contaminants. No readings above action levels were recorded.

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

The enforcement process is on-going.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
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
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Hazardous Liquid (Sodium Hydride)	pounds	80	009226932	H141	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
Waste Sulfuryl Chloride	gallons	20	009653648	H141	Dynecol, Detroit, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Complete sample collection;

Complete hazcatting of collected samples;

Continue to transfer drums and containers from building to conex boxes prior to lab-pack activities;

Enter all hazard categorization data into U.S. EPA's ERT DrumTrak database program;

Continue general cleanup activities;

Continue air monitoring during removal activities;

2.2.1.1 Planned Response Activities

Secure the building and leaking containers;

Develop and implement a site-specific Health and Safety Plan;

Develop and implement a site Work Plan;

Inventory, hazcat, and sample for off-site disposal hazardous substances in drums and containers

Excavate and dispose of contaminated soil;

Backfill excavation areas with clean soils and restore the site as needed.

2.2.2 Issues

None.

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

Stan Williams - ERRS

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 is not utilized.

3.2 Cooperating Agencies

Detroit Fire Department
Michigan Department of Environmental Quality
Detroit Environmental Affairs
United State Coast Guard - Atlantic Strike Team

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

www.epaossc.org/lyndonstreetdrums

6.2 Reporting Schedule

POLREPS will be issued weekly or as necessary.

7. Situational Reference Materials

Material Safety Data sheets