

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Detroit Tubular Rivet - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Initiation of Removal Action  
Detroit Tubular Rivet  
C5C7  
Wyandotte, MI  
Latitude: 42.1916080 Longitude: -83.1683030

**To:** Heriberto Leon, U.S. EPA  
Joseph DeGrazia, MDEQ

**From:** Brian Kelly, OSC  
**Date:** 5/29/2012

**Reporting Period:**

## 1. Introduction

### 1.1 Background

Site Number:	C5C7	Contract Number:	
D.O. Number:		Action Memo Date:	4/10/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/21/2012	Start Date:	5/21/2012
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510694	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

### Incident Category

Fund Lead Time-Critical Removal

### Site Description and Location

The site is located at 1213 Grove Street, Wyandotte, Michigan, 48192. The current owner is the bankrupt Detroit Tubular Rivet Inc. (DTR). DTR manufactured bolts, nuts, rivets and washers, specializing in metal rivets (NAICS 332722), and operated zinc and brass electroplating services, from 1954 until filing for Chapter 11 bankruptcy on December 17, 2010, file number 10-77682, in the US Bankruptcy Court, Detroit, Michigan.

### Preliminary Removal Assessment/Removal Site Inspection Results

On January 20, 2012, Michigan Department of Environmental Quality (MDEQ) requested EPA assistance in cleanup of the site. MDEQ included in its referral to EPA a January 12, 2012, Violation Notice sent to DTR that listed 16 hazardous and liquid industrial waste violations including failure to perform the following: minimize the possibility of fire, explosion, or release of hazardous waste which could threaten human health and/or the environment; maintain containers of hazardous waste in good condition; maintain closed hazardous waste containers except when adding or removing waste; and manage waste in a manner that prevents the discharge of liquid industrial waste into the soil, surface water, groundwater, or a drain or sewer. DTR's response to the Violation Notice stated, "DTR will not be able to address your violations; I am jobless with no money to pay for disposal."

On January 30, 2012, EPA conducted a site assessment, which documented the site as abandoned with more than 300 drums, totes, and containers. Operations at the site ceased in August 2011, when nearly all equipment was sold off at auction. Only chemicals and a few pieces of equipment associated with the site were still present during the site assessment. The remaining 300 plus containers are stored in 11 areas of the site, which includes 100 steel, polyethylene (poly) and fiber drums. Some of the drums show signs of deterioration, damage, or possible leaking, and seven drums were found labeled as containing sodium or copper cyanide. EPA collected representative samples from two blue poly drums and one steel drum that showed drums DTR-WL02-013012 and DTR-WL03-013012 contain liquids with a pH of less than 1 standard unit (SU), which according to regulations at 40 CFR 261.22, makes the waste hazardous for characteristics of corrosivity. Solid samples taken from a steel roll-off dumpster and a fiber drum showed DTR-WS01-013012 and DTR-WS02-013012 contain cyanide, which is a listed hazardous substance under 40 CFR 302.4. The site assessment documented five drums labeled as Hazardous Waste - Methylene Chloride,

which is a hazardous waste under 40 CFR 261.31.

## 2. Current Activities

### 2.1 Operations Section

#### Response Actions to Date

On May 2, 2012, EPA held a public meeting to discuss cleanup work with area residents. The meeting was held at the Department of Public Service Building, 4201 13th Street, Wyandotte, Michigan. The meeting was announced during a Wyandotte City Council Meeting on April 30, through a mailer sent to residents within half a mile of the site, and in an advertisement listed in the News Herald.

On May 21, 2012, EPA mobilized to the site to begin cleanup work. During the week of May 21, EPA completed site setup, drum inventory, and drum sampling.

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

General notice of liability and requests for information were sent to the three owners of DTR. As the business filed for bankruptcy, it is unlikely EPA costs will be recovered.

#### 2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

## 2.2 Planning Section

### Anticipated Activities

EPA will clean the plating trenches, composite drums, and send disposal samples to the lab. Once the sample results are received, EPA will arrange for off-site disposal of wastes.

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

No information available at this time.

## 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

No information available at this time.

## 4. Personnel On Site

No information available at this time.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

No information available at this time.

## 7. Situational Reference Materials

No information available at this time.