

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Baycote Metal Finishing Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Progress
Baycote Metal Finishing Site
C5B2
Mishawaka, IN
Latitude: 41.6497046 Longitude: -86.1648540

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From: Ramon C. Mendoza, OSC

Date: 6/29/2012

Reporting Period: 6/24/2012 to 6/29/2012

1. Introduction

1.1 Background

Site Number:	C5B2	Contract Number:	EP-S5-09-05
D.O. Number:		Action Memo Date:	2/23/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/29/2012	Start Date:	5/29/2012
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action: Manufacturing/Processing/Maintenance – Electroplating, Metal Finishing

1.1.2 Site Description

Baycote Metal Finishing (Baycote or the Site) began operation in 1982. The facility electroplated and anodized steel and steel casings with zinc, cadmium, and chromium for the automotive, recreational vehicle, and trailer industries. The facility ceased operations in January 2008, however, according to facility records approximately 111,000 gallons of waste remained on site at the time. In October 2009, the Indiana Department of Environmental Management (IDEM) and the owner of the site entered into an Order to remove and dispose of all hazardous waste. However, work ceased and in February 2010, approximately 50,000 gallons of waste remained on-site.

1.1.2.1 Location

The Baycote Metal Finishing Site is located at 1302 Industrial Drive in Mishawaka, St. Joseph County, Indiana 46544. The geographical coordinates for the Site are 41°39'0.03" North latitude and 86°09'57.11" West longitude. The Site is bordered by industrial properties to the north, east, and south and Industrial Drive and industrial properties to the west. Residential properties are located approximately 700 feet to the west. Seven churches and two schools are located within 1 mile of the Site. The St. Joseph River, a major surface water body that terminates in Lake Michigan, is located 0.85 mile northwest of the Site.

1.1.2.2 Description of Threat

Abandoned and unknown waste in vats, pits, tanks, drums and containers was located throughout the building. Many vats, pits, tanks and containers are open with contents exposed. Animal prints were observed in material piles on the building floor. Several drums are corroded and leaking onto the floor. Evidence of previous spills was noted in several areas. The building is in a deteriorating condition; a section of roof in the Wastewater Treatment Room had collapsed, exposing the room and its contents to weather. Due to the roof collapse and holes in the roof in other areas, rain water has accumulated in several sections of the building. Vats, totes, and containers that contain incompatible wastes (acids, caustics, cyanides) are present inside the facility. Based on these conditions, nearby populations and the environment could be exposed to potentially hazardous materials if contaminants migrate off site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

U.S. EPA On-Scene Coordinators (OSCs) Theresa Holz and Jacob Hassan conducted a Site visit on November 21, 2011, with the St. Joseph County Health Department (SJCHD). During the visit, the OSCs documented numerous tanks, drums, containers and spilled material on the floor. The OSCs also observed containers labeled as acid, chromate, nitrate, hexavalent chrome, and cyanide. The Site was in disrepair, with a portion of the roof collapsed inside the facility. The containers were not organized, secured, or maintained in a manner necessary to prevent spillage, inter-mixture of potentially flammable or combustible materials, and/or release. The containers also were not all properly or sufficiently labeled or identified, for safety purposes.

On December 12 and 13, 2011, U.S. EPA performed a Site Assessment including sample collection. Activities performed during the Site Assessment included:

- Documenting Site conditions;
- Conducting air monitoring;
- Inventorying drums and other small containers; and
- Collecting samples from vats, pits, tanks, drums and containers and spilled material.

The Site Assessment documented numerous drums, plating vats, pits, tanks, small containers, and spilled material. Drums and containers were labeled as acid, chrome, and caustic. Numerous plating vats and other process equipment were documented inside the building.

Analytical results documented reactive cyanide and total cyanide at concentrations of up to 30,000 mg/l and verified the presence of a characteristic of a hazardous waste for reactivity (D003).

Analytical results from liquid samples documented pH values of less than 2. and represent waste that meets the definition of characteristically hazardous waste for corrosivity (D002) because the pH value is less than or equal to 2 standard units (SU) or greater than or equal to 12.5 SUs.

Analytical results from solid samples also found concentrations which exceeded the TLCP regulatory limits for Chromium and Cadmium, indicating that characteristically hazardous wastes representing those two metals are present at the Site. Results also found characteristic hazardous waste based on exceedence of the ignitability criteria.

In a letter dated November 11, 2011, the St. Joseph County Health Department (SJCHD) requested assistance from the U.S. EPA to secure hazardous wastes left on-site. SJCHD was concerned that the Site posed a significant threat to the health and safety of companies within the industrial park as well as the residential area located less than a 1,000 feet from the facility. On February 23, 2012, the Director of U.S. EPA's Superfund Division approved an Action Memorandum approving funding for a time-critical removal action at the Baycote Metal Finishing Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In a letter dated November 11, 2011, the St. Joseph County Health Department (SJCHD) requested assistance from the U.S. EPA to secure hazardous wastes left on-site. SJCHD was concerned that the Site posed a significant threat to the health and safety of companies within the industrial park as well as the residential area located less than a 1,000 feet from the facility. On February 23, 2012, the Director of U.S. EPA's Superfund Division approved an Action Memorandum approving funding for a time-critical removal action at the Baycote Metal Finishing Site.

On April 6, 2012, U.S. EPA issued a Unilateral Administrative Order to the potentially responsible parties to conduct a removal action at the Site. The potentially responsible parties presented an inability to pay argument and indicated that they did not intend to conduct a removal action at the Site. EPA began time-critical removal actions at the Baycote Site on May 29, 2012.

Removal activities on Site will include: Develop and implement a Site Health and Safety Plan and Site Security Plan; Develop and implement a Site Work Plan, a Sampling Plan, Air Monitoring Plan and a Site Emergency Contingency Plan; Inventory and perform hazard categorization on substances contained in vats, pits, drums, and other containers; Perform sampling and analysis to determine disposal options; Consolidate and package hazardous substances, pollutants, and contaminants for transportation and off-site disposal; Dismantle and decontaminate process equipment and building components associated with

the plating areas, as necessary; Transport and dispose of all characterized or identified hazardous substances, pollutants, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA Off-Site Rule (40 CFR § 300.440).

This is a large Site, with 11 plating lines in 6 areas and an onsite waste water treatment plant/collapsed roof. The OSC and its contractors have adopted a work plan to cleanup one area/plating line at a time, starting with the most contaminated while ensuring safety and efficiency.

2.1.2 Response Actions

Please refer to previous Polreps for response actions before June 24, 2012.

During the reporting period, EPA conducted the following activities:

- All of the containers have been identified, marked, measured, and sampled. The on-site chemist has conducted hazard categorization tests on about 600 samples and completed hazcatting activities. Lab Results from the first batch of HAZCAT samples to be analyzed for disposal are pending.
- Cleanup work is 95% complete in the first three plating lines heavily contaminated with Cyanide (aka Area U on Lines 5,6,9) All the vats have been removed and decontaminated with all sludge, cyanide liquid and containerized for disposal. Acid wastes were also containerized separately for disposal. Sumps in this area have been pumped out and cleaned out. Air control units were left in place due to its potential structural damage to the roof is removed.
- Acids were transferred into DOT compliant containers (Totes) in Area E and staged for disposal.
- EPA and START continued to conduct site perimeter and work area air monitoring to ensure worker and community protection.
- One hazardous debris box and one solid waste debris box were shipped off-site for disposal.
- The HASP amendment was approved and signed.
- All hazardous waste to be disposed is being stored in totes, haz boxes and drums in Area J and R (See list in Section 2.1.4)
- EPA Site audit was performed on the site by EPA Management on June 25.
- EPA is implementing Green Practices onsite.

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

Information on the PRP is in the Site file. Enforcement strategies are included in a confidential enforcement memorandum.

2.1.4 Progress Metrics

The following waste has been staged and ready for disposal as of 6/29/2012

2	55-gallon drums of Haz basic vat bottom sludge
5	330-gallon totes of Haz cyanide containing liquid
10	55-gallon drums of Haz cyanide containing vat bottom sludge
2	cubic-yard boxes of Haz cyanide solids
2	95-gallon overpacks of Haz cyanide solids
9	cubic-yard boxes of Haz solids
13	330-gallon totes of Haz acid liquid
2	55-gallon drums of Haz neutral liquid
18	RCRA-empty vats (various sizes)
36	330-gallon tote metal frames (poly portion has been cut apart and placed in roll-offs)

Waste Stream	Date	Quantity	Manifest #	Treatment	Disposal facility
Solid Waste Debris	6/6/12	30 yards	001		WM Landfill Wyatt IN
Solid Waste Debris	6/8/12	30 yards	002		WM Landfill Wyatt IN

Haz Waste Debris	6/18/12	25 yards	004354475FLE		Envirosafe Services of Ohio, Oregon Ohio
Solid Waste Debris	6/21/12	30 yards	003		WM Landfill Wyatt IN
Haz Waste Debris	6/26/12	30 yards	004354473 FLE		Envirosage Services of Ohio, Oregon Ohio
Solid Waste Debris	6/29/12	30 yards	004		WM Landfill, Wyatt IN

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Removal activities on Site will include:

1. Start Cleanup in plating Lines 1-2-3 in Room A. This room is heavily contaminated with acids and cyanides;
2. Continue to consolidate and package hazardous substances, pollutants, and contaminants for transportation and off-site disposal;
3. Develop waste profiles for the waste and conduct bidding process to determine disposal options/facility.
4. Investigate soils in the stressed vegetation in eastern area of the Site.
5. Dismantle and decontaminate process equipment and building components associated with the plating areas, as necessary;
6. Transport and dispose of all characterized or identified hazardous substances, pollutants, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA Off-Site Rule (40 CFR § 300.440)
7. Site Work plan and schedule have been submitted and will continue to be adjusted as needed. Work is planned to continue the end of Oct. 2012 with an estimated budget of about \$1,000,000.

2.2.1.2 Next Steps

Cleanup of the plating shop and off-site disposal of wastes is anticipated to take approximately 6 months to complete. When time-critical removal actions are completed, EPA will refer the Site to the Indiana Department of Environmental Management (IDEM).

During the week of July 1, 2012,

- Initiate cleanup work in Plating Lines 1-2-3 in Room A.
- Consolidate / repack containers
- Repack / transfer containers into D.O.T. shippable containers.
- Demolish RCRA empty containers.
- Continue air monitoring in the work zone and the perimeter of the Site.
- Evaluate disposal options based upon waste volumes, containers, hazard categorization results and Site logistics and initiate bidding process for disposal of hazardous waste.

2.2.2 Issues

The main health and safety issues during the period at the Site are potentially harmful emissions of hydrogen cyanide and acid spills. The issues is addressed through engineering controls and good work practices. In addition, all workers briefed everyday to make sure everyone stays vigilant and safe. OSC and START are closely monitoring all areas, especially piles of solids and liquids to ensure no unsafe emissions or acid spills are occurring.

Temperatures onsite reached 106 degrees (F) in the shade on 6/28/2012. To protect workers from the heat the following steps are being taken:

- Workers are using Ice vest,
- Multiple breaks are taken (up to once per hour) as needed,
- buddy system is in place to check for signs of heat stress (in addition to the RM and OSC observing).
- Cold water and gatorade are supplied at all times.
- Work Shift is started at 0600 (one hour earlier) and may be adjusted as needed.
- Workers are briefed everyday during the tailgate/safety meetings on weather and heat stress.

2.3 Logistics Section

NA

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,000,000.00	\$202,088.99	\$797,911.01	79.79%

START	\$50,000.00	\$37,500.00	\$12,500.00	25.00%
Intramural Costs				
Total Site Costs	\$1,050,000.00	\$239,588.99	\$810,411.01	77.18%

* 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

The Health and Safety Plan was approved and signed by all site personnel. Safety meetings are held daily.

2.5.2 Liaison Officer

NA

2.5.3 Information Officer:

Community Involvement Coordinator: Ginny Narsete

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

IDEM

City of Mishawaka

St. Joseph County Health Department

Mishawaka Fire Department

4. Personnel On Site

The following numbers of personnel were on-Site during the reporting period:

Organization		Position	# Personnel
EPA		OSC	1
ERRS		Response Manager	1
		Foreman	1
		Field Chemist	1
		Laborer	5
		Field Cost Accountant	1
Weston		START	1

5. Definition of Terms

Baycote	Baycote Metal Finishing Site
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRZ	Contamination Reduction Zone
EPA	Environmental Protection Agency
ERRS	Emergency and Rapid Response Services
D.O.T.	Department of Transportation
FCA	Field Cost Accountant
HASP	Health and Safety Plan
HAZCAT	Hazardous Categorization
IDEM	Indiana Department of Environmental Management
NA	Not Applicable
OSC	On-Scene Coordinator
PolRep	Pollution Report
RCRA	Resource Conservation and Recovery Act
PRP	Potentially Responsible Party
RM	Response Manager
START	Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/BaycoteMetalFinishing

6.2 Reporting Schedule

PolReps will be submitted on a weekly or bi-weekly basis.

7. Situational Reference Materials

No information available at this time.

POLREP #5 Last Updated 7/2/2012