

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #12
Progress
Baycote Metal Finishing Site
C5B2
Mishawaka, IN
Latitude: 41.6497046 Longitude: -86.1648540

To: Sam Borries, U.S. EPA
Jason El-Zein, U.S. EPA
Valencia Darby, Department of Interior
Lindy Nelson, Department of Interior
Mark Durno, U.S. EPA
Mark Johnson, ATSDR
Sherry Fielding, U.S. EPA
Charlie Gebien, U.S. EPA
John Glover, U.S. EPA
Beverly Kush, U.S. EPA
Mindy Clements, U.S. EPA
Thomas Marks, U.S. EPA
Mike Ribordy, U.S. EPA
Harry Atkinson, IDEM
Gabriele Hauer, IDEM
Max Michael, IDEM
Rex Osborn, IDEM
John Lankowicz, St. Joseph County Health Department
Dan Chesterson, IDEM
Dale Freeman, City of Mishawaka
Virginia Narsete, U.S. EPA
Thomas Turner, U.S. EPA
Carol Ropski, U.S. EPA
Rich Hackel, IDEM

From: Paul Atkociunas, OSC

Date: 8/24/2012

Reporting Period: August 20 - 24, 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

See Initial Polrep.

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

See Initial Polrep.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Initial Polrep.

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 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 and 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.

This is a large Site, with 11 plating lines in 6 areas and an onsite waste water treatment plant with a 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 August 20, 2012.

During the reporting period, EPA Conducted the following activities:

- EPA and START continued to conduct site perimeter and work area air monitoring to ensure worker and community protection.
- Cleanup in Area A continues. Cyanide sludge in Vat A15 was removed and containerized for off-site disposal. Vat A15 was removed from containment, scraped and powerwashed. The liner for the Vat was adhered to the wall of the vat. Contaminated sections of the liner were be removed and placed into the Haz Waste Debris roll-off. The vat will be rendered unusable and left onsite. Disposal options for the sludge in the secondary containment units for Area A are being considered.
- Cleanup in Area C continues. Light stands were staged; debris and containers were removed from the room. Waste liquids were pumped from Vat C7 to the 4,900 gallon poly tank.
- Cleanup in Areas H continued; Vat H22 was rendered unusable and will be left in place. Although residual debris remained in Area H, focus will be placed in other areas of the Site that contain bulk liquids and concentrated wastes.
- Cleanup in Area G continued; Area L was accessed through a framed wall shared with Area G (the doorway into Area L was inaccessible because it is located in the collapsed portion of Area W). Waste containers were removed from Areas G and L, HazCatted and prepared for off-site disposal.
- Base liquids were consolidated into the 4,900 gallon poly tank and shipped off-site for disposal; see Table below for details.
- Waste was removed from tanks associated with the wastewater treatment system located in Area E. Tanks were demolished, rinsed and placed into the appropriate roll-off for off-site disposal. Process piping associated with the wastewater treatment system was cut, rinsed and placed into the appropriate roll-off. The steel decking associated with the system was scraped and powerwashed. Rinse waters were collected for off-site disposal.
- One roll-off of Nonhazardous debris was removed from Site; see Table below for details.
- A supplier for the cylinders located at the Site was contacted.
- Cubic yard boxes of Hazardous waste solids were shipped for off-site disposal; see Table below for details.
- EPA, ERRS and START continued to assess options for accessing, removing wastes in Area W.
- EPA's supplied air trailer is onsite to support Level B work.
- EPA and its contractors is implementing Green Practices onsite (double sided printing, dedicated water bottles, dedicated steel toed Chem boots, city electrical power, CFL bulbs, etc...)

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 August 24, 2012

21 55-gallon drums of Haz basic vat bottom sludge

1 55-gallon drums of Haz acid vat bottom sludge

10 330-gallon totes of Haz cyanide containing liquid

47 55-gallon drums of Haz cyanide containing vat bottom sludge

1 cubic-yard boxes of Haz cyanide solids

2 95-gallon overpacks of Haz cyanide solids

0 cubic-yard boxes of Haz solids

3 330-gallon totes of Haz acid liquid

19 55-gallon drums of Haz neutral liquid

15 RCRA-empty vats (various sizes)

69 330-gallon tote metal frames (poly portion has been cut apart and placed in roll-offs)

10 330 gallon tote haz base liquid

11 330 gallon tote haz neutral liquid

13 55-gallon drums of Haz neutral solids

3 55-gallon drums of Haz base liquid

41 55-gallon drums of non-Haz neutral solids

1 4,900 gallon poly tank (full of neutral liquid)

<i>Waste Stream</i>	<i>Date</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal facility</i>
Solid Waste Debris	6/6/12	30 Cubic yards (CY)	001		WM Landfill Wyatt IN
Solid Waste Debris	6/8/12	30 CY	002		WM Landfill Wyatt IN
Haz Waste Debris	6/18/12	25 CY	004354475FLE		Envirosafe Services of Ohio, Oregon Ohio
Solid Waste Debris	6/21/12	30 CY	003		WM Landfill Wyatt IN
Haz Waste Debris	6/26/12	30 CY	004354473 FLE		Envirosafe Services of Ohio, Oregon Ohio
Solid Waste Debris	6/29/12	30 CY	004		WM Landfill, Wyatt IN
Haz Waste Debris	7/03/12	25 CY	004354477FLE		Envirosafe Services of Ohio, Oregon, Ohio
Solid Waste Debris	7/12/12	30 CY	005		WM landfill, Wyatt, IN
					WM

Solid Waste Debris	7/18/12	30 CY	006		landfill, Wyatt, IN
Cyanide Waste (UN 1935)	7/31/12	3440 gallons	010411950JJK		Dynecol Inc., Detroit, MI
Waste Toxic, Inorganic (UN 3288)	7/31/12	6400 pounds	010411950JJK		Dynecol Inc., Detroit, MI
Solid Waste Debris	8/02/12	30 CY	007		WM landfill, Wyatt, IN
Chromic Acid (UN 1755)	8/02/12	2700 gallons	010411037JJK		Dynecol Inc., Detroit, MI
Acid Liquid (UN 3264)	8/02/12	1475 gallons	010411037JJK		Dynecol Inc., Detroit, MI
Haz Waste Debris	8/09/12	25 CY	004354466FLE		Envirosafe Services of Ohio, Oregon, Ohio
Waste Corrosive Liquid, Basic (UN 3266)	8/10/12	4638 gallons	010411219 JJK		Dynecol Inc., Detroit, MI
Acid Liquid (Nitric, Chromium, Cadmium, UN 3264)	8/10/12	1320 gallons	010411079 JJK		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Hydrochloric, Sulfuric, Chromium, UN 3264)	8/10/12	1920 gallons	010411079 JJK		Dynecol Inc., Detroit, MI
Solid Waste Debris	8/15/12	30 CY	008		WM landfill, Wyatt, IN
Waste Chromic Acid (UN 1755)	8/17/12	3420 gallons	010411337 JJK		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Nitric, UN3264)	8/17/12	790 gallons	010411337 JJK		Dynecol Inc., Detroit, MI
Hazardous Waste Solid (NA3077)	8/20/12	22 CY	005607311 FLE		Michigan Disposal, Belleville, MI
Solid Waste Debris	8/20/12	30 CY	009		WM landfill, Wyatt, IN
Waste Corrosive Liquid, Basic (UN3266)	8/21/12	3249 gallons	010411359 JJK		US Ecology, Detroit, MI (formerly Dynecol)
Solid Waste Debris	8/24/12	30 CY	010		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. Continue cleanup in Areas C and E.
2. Recycle RCRA empty containers.
3. Continue to consolidate and package hazardous substances, pollutants, and contaminants for transportation and off-site disposal;
4. Evaluate bids to determine disposal options/facility.
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 October 2012.

2.2.1.2 Next Steps

During the week of August 27, 2012, the following activities are anticipated:

- Transport the following waste for off-site disposal: 1) Cyanide waste; 2) Neutral liquids.
- Continue cleanup work in Area C, specifically pump the water accumulated on the floor of the room, and removal of the bulk of the waste in the Area.
- Determine management / disposal options for wastes accumulated in the secondary containment units in Area A.
- Continue to remove wastes, powerwash, and manage wastes from management of the wastewater treatment system located in Area E.
- Assess options to access / manage wastes located in Area W.
- Consolidate Neutral liquids into the 4,900 gallon poly tank in preparation for shipment.
- Consolidate / repackage waste into containers as needed into D.O.T. shippable containers.
- Demolish RCRA empty containers.
- Conduct hazcat testing to characterize additional waste samples for disposal.
- Continue air monitoring in the work zone and the perimeter of the Site to protect workers and residents.
- Continue Evaluate the bids for the disposal of hazardous waste and chose facility as needed.
- Continue to submit waste profiles to selected disposal facilities as needed.
- Recycle RCRA empty containers.

2.2.2 Issues

The main health and safety concerns during the period at the Site are potentially harmful emissions of hydrogen cyanide, acid vapor/spills, and particulates containing Cadmium and any other contaminants present. The issue is addressed through engineering controls, PPE, and good work practices. An ERRS Chemist is performing compatibility testing on all materials to ensure proper management.

On August 23, 2012, an AreaRAE unit was incidentally placed on container E50 (cubic yard box), which was located in Area E. The unit indicated elevated levels (6 parts per million) of Hydrogen Cyanide. START screened the container and confirmed elevated readings adjacent to the opening of the container. Readings away from the container remained non-detect. The container was re-located to a west dock door. ERRS and START conducted a level B entry to assess the contents and sample the waste. Bags labeled as sodium metabisulfite were observed. Two samples were collected for Hazard Categorization. Material Safety Data Sheets for sodium metabisulfite indicated that sulfur dioxide may be generated as a degradation product. The RAE Systems manual indicated that Hydrogen Cyanide sensors have a cross-sensitivity to sulfur dioxide. Hazard Categorization results of the sample material did not indicate the presence of cyanide. ERRS repackaged the contents of the cubic yard box into 55-gallon drums while in Level B PPE. No other concerns were noted.

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	\$561,300.00	\$438,700.00	43.87%
START	\$117,500.00	\$80,100.00	\$37,400.00	31.83%
Intramural Costs				

Total Site Costs	\$1,117,500.00	\$641,400.00	\$476,100.00	42.60%
-------------------------	----------------	--------------	--------------	--------

* 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 and 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
	Chemist	1
	Foreman	1
	Laborer	5
	Field Cost Accountant	1
	Equipment Operator	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.

