

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #15**
Progress
Baycote Metal Finishing Site
C5B2
Mishawaka, IN
Latitude: 41.6497046 Longitude: -86.1648540

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From: Paul Atkociunas, OSC

Date: 9/14/2012

Reporting Period: September 10 -14, 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 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.

This is a large Site, with 11 plating lines in 6 areas and several waste water treatment systems. The OSC and its contractors have adopted a work plan to prioritize the high hazard areas / plating lines.

2.1.2 Response Actions

Please refer to previous Polreps for response actions prior to September 10, 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 continued. Analytical results for the sludge in the secondary containment pits has been received. The sludge in the secondary containment pits is being solidified with corn cob / portland cement. Liquids in Vats A87 and A88 were pumped and transferred to an onsite Vat.
- Cleanup in Area C continued. The majority of the operations in Area C has been completed. Waste has been pumped from Vats and containers have been removed. Vats have been washed, rinse waters have been collected for off-site disposal. Vats have been left in place, however the vat / tank system has been rendered unusable. Process piping has been removed and power-washed for off-site disposal. Removal / disposal options for the air handling system are being explored. Methods to recycle the zinc ball anodes continues to be explored.
- Cleanup in Area E continued. Several tanks were cut open. Waste / sludge was removed for off-site disposal. Tanks, process equipment, and decking for the wastewater treatment system has been power washed. Rinse waters are collected for off-site disposal.
- Several large tanks in Area J have been cut open. Tank J-12 has several feet of sludge. Tank J-13 contained residual sludge and scale. The tank has been cleaned, rinsed and rendered unusable.
- Waste liquids from Area Z were pumped from several vats into tanks / containers for off-site disposal.
- A trailer load of corrosive waste was shipped for off-site disposal; see Table below for details.
- A bulk load of hazardous waste liquids was shipped for off-site disposal; see Table below for details.
- A bulk load of non-hazardous liquids was 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...). To date 25,780 pounds of scrap steel has been recycled.
- Four cylinders - 3 acetylene, and 1 liquefied petroleum have been returned to the local supplier / manufacturer.

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 for disposal as of September 7, 2012

18 55-gallon drums of Haz basic vat bottom sludge
 7 55-gallon drums of Haz acid vat bottom sludge
 0 330-gallon totes of Haz cyanide containing liquid
 0 55-gallon drums of Haz cyanide containing vat bottom sludge
 1 Cubic-yard boxes of Haz cyanide solids
 3 95-gallon overpacks of Haz cyanide solids
 11 Cubic-yard boxes of Haz solids
 10 330-gallon totes of Haz acid liquid
 0 55-gallon drums of Haz neutral liquid
 26 RCRA-empty vats (various sizes)
 74 330-gallon tote metal frames (poly portion has been cut apart and placed in roll-offs)
 9 330 gallon tote Haz base liquid
 11 330 gallon tote Haz neutral liquid
 31 55-gallon drums of Haz neutral solids
 6 55-gallon drums of Haz base liquid
 42 55-gallon drums of non-Haz neutral solids
 1 4,900 gallon poly tank (filled with about 500 gallons of Non-Hazardous Neutral Liquid)
 0 330-gallon tote non-Haz neutral liquid
 0 55-gallon drums acid liquid
 2 330 gallon Haz oil/water mix

Waste Stream	Date	Quantity	Manifest #	Treatment	Disposal facility
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
Solid Waste Debris	7/18/12	30 CY	006		WM 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	010411219JJK		Dynecol Inc., Detroit, MI
Acid Liquid (Nitric, Chromium, Cadmium, UN 3264)	8/10/12	1320 gallons	010411079JJK		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Hydrochloric, Sulfuric, Chromium, UN 3264)	8/10/12	1920 gallons	010411079JJK		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	010411337JJK		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Nitric, UN3264)	8/17/12	790 gallons	010411337JJK		Dynecol Inc., Detroit, MI
Hazardous Waste Solid (NA3077)	8/20/12	22 CY	005607311FLE		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	010411359JJK		US Ecology, Detroit, MI (formerly Dynecol)
Solid Waste Debris	8/24/12	30 CY	010		WM landfill, Wyatt, IN
Cyanide Waste (UN1935)	8/27/12	1500 gallons	010413023JJK		US Ecology, Detroit, MI
Waste Toxic, Inorganic (UN3288)	8/27/12	2400 pounds	010413023JJK		US Ecology, Detroit, MI
Cyanide Waste (UN1935)	8/27/12	2200 gallons	010413024JJK		US Ecology, Detroit, MI
Non-hazardous Liquids	8/28/12	5465 gallons	010413028JJK		US Ecology, Detroit, MI
Non-hazardous Liquids	8/28/12	4967 gallons	010413027JJK		US Ecology, Detroit, MI
Solid Waste Debris	8/28/12	30 CY	011		WM landfill, Wyatt, IN
Non-hazardous Liquids	8/30/12	4717 gallons	010413049JJK		US Ecology, Detroit, MI
Hazardous Waste Liquids (NA3082)	9/05/12	3371 gallons	010413083 JJK		US Ecology, Detroit, MI
Solid Waste Debris	9/07/12	30 CY	012		WM landfill, Wyatt, IN
Hazardous Waste Liquids (NA3082)	9/10/12	3615 gallons	010130168 JJK		Vickery Environmental, Vickery, OH

Waste Corrosive Liquids, Acidic (UN3264)	9/10/12	1700 gallons	010413113 JJK		US Ecology, Detroit, MI
Waste Corrosive Liquids, Basic (UN3266)	9/10/12	335 gallons	010413113 JJK		US Ecology, Detroit, MI
Waste Corrosive Liquids, Acidic (UN3264)	9/10/12	1500 gallons	010413107 JJK		US Ecology, Detroit, MI
Waste Chromic Acid (UN1755)	9/10/12	385 gallons	010413107 JJK		US Ecology, Detroit, MI
Non-hazardous Liquids	9/14/12	4,310 gallons	010413050 JJK		US Ecology, Detroit, MI
Solid Waste Debris	9/14/12	30 CY	013		WM landfill, Wyatt, IN

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Planned removal activities on Site include:

1. Inventory and perform hazard categorization on substances contained in vats, pits, drums, and other containers;
2. Perform sampling and analysis to determine disposal options.
3. Continue to consolidate and package hazardous substances, pollutants, and contaminants for transportation and off-site disposal;
4. Dismantle and decontaminate process equipment and building components associated with the plating areas, as necessary;
5. 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) .
6. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant and contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment

2.2.1.2 Next Steps

During the week of September 17, 2012, the following activities are anticipated:

- Continue cleanup work in Areas A, E and Z.
- Assess options to access / manage wastes located in Area W.
- START to sample sludge in Vat J12, which appears to be associated with process equipment in Area W. START to complete Field Sampling Plan and initiate QAPP process per the START3 QAPP Procedures. The OSC determined this to be a time-critical sampling need to determine threats in Area W.
- Consolidate / repackage waste into containers as needed into D.O.T. shippable containers.
- Demolish RCRA empty containers.
- Conduct hazcat testing / waste sampling to determine waste characteristics and disposal options.
- Continue air monitoring in the work zone and the perimeter of the Site to protect workers and residents.
- Evaluate the bids for the disposal of hazardous waste and choose facility as needed.
- Continue to submit waste profiles to selected disposal facilities as needed.
- Recycle scrap metal generated from clean-up operations.

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.

2.3 Logistics Section

NA

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,300,000.00	\$746,000.00	\$554,000.00	42.62%

START	\$117,500.00	\$93,655.00	\$23,845.00	20.29%
Intramural Costs				
Total Site Costs	\$1,417,500.00	\$839,655.00	\$577,845.00	40.77%

* 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.
Health and 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:

OrganizationPosition		# Personnel
EPA	OSC	1
ERRS	Response Manager	1
	Chemist	1
	Foreman	1
	Laborer	5
	Field Cost Accountant	1
	Equipment Operator	2
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 #15 Last Updated 9/14/2012