

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #20
Progress
Baycote Metal Finishing Site
C5B2
Mishawaka, IN
Latitude: 41.6497046 Longitude: -86.1648540

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From: Paul Atkociunas, OSC

Date: 10/12/2012

Reporting Period: October 8 - 12, 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 10/8/12. 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.
- The Mayor of Mishawaka discussed site activities / site progress with OSC Atkociunas.
- High School Students from Penn High School interviewed OSC Atkociunas regarding site activities for an Environmental Science Class.
- EPA, START, and ERRS continued to monitor the source material from the September 14 incident. Analytical data from the September 26 sampling event was reviewed. Based upon analytical data / physical characteristics of the drums, the contents of six containers were consolidated into one 55-gallon drum and two containers were consolidated into another 55-gallon drum. Prior to consolidation, ERRS conducted a 'bucket test' to determine if any reactions, heat, and/or byproducts of consolidation would be generated. No anomalies were detected. The empty containers were washed and rinsed; rinsewaters were collected for off-site disposal. EPA, ERRS and START monitored the two drums for reactions, heat, and/or byproducts of consolidation; no anomalies were detected. ERRS procured disposal services for the source material from the incident and scheduled shipment for the week of October 14.
- Backfill operations in Area A continued. ERRS placed recycled concrete in the cleaned secondary containment pits to bring the area closer to grade.
- Cleanup in Area Z continued. ERRS completed clean-up of Vat Z6 (the vat is approximately 70 feet in length and 7 feet wide. Debris in the tank was cleaned and placed into the appropriate container. ERRS accessed / cleaned Vats Z66, Z58, Z59, Z26 and Z27. Sludges were collected for off-site disposal. ERRS cleaned / powerwashed structures and collected rinsewater for characterization and off-site disposal. ERRS demolished piping and a portion of the cat walk to access the Vats in the northeast section of the room.
- The 4,900 gallon Rain for Rent poly tank (which was cleaned / decontaminated during the week of September 24) was demobilized from site.
- A tanker load of non-RCRA material (cyanide wastewater) was shipped for off-site disposal. The wastewater was generated from clean-up operations in Area A. See Table below for details.
- Cleanup in Area E continued. ERRS pumped liquids from tank E, which is located below grade in the Northwest corner of the room. Hazard Categorization, using improved procedure developed by ERRS were used with START oversight to determine the chemical characteristics of several unknown wastes in containers. EPA is supporting the haz cat work with additional air monitoring instruments. Non-hazardous waste sludges generated from clean-up in Area E were shipped off-site for disposal; see Table below for details.
- Cleanup in the Haz Cat area (Southwest corner of Area R) continued. Hazard Categorization, using improved procedure developed by ERRS were used with START oversight to determine the chemical characteristics of several unknown wastes in small containers. EPA is supporting the haz cat work with additional air monitoring instruments.
- EPA and START continued to develop a Quality Assurance Project Plan (QAPP) for START sampling associated with the removal. The sampling includes the sample collected from J12 to determine the threat posed by wastes associated with Area W. Soil sampling to characterize site soils will also be included in the QAPP.
- The Engineering Structural Condition Report was received and is in the process of being reviewed.

Recommendations will be implemented, as necessary.

- EPA's supplied air trailer is onsite to support Level B work.

- EPA and its contractors are implementing Green Practices onsite (double sided printing, Culligan water service / dedicated water bottles, dedicated steel toed Chem boots, city electrical power, CFL bulbs, etc...). To date 42,700 pounds of scrap steel has been recycled.

2.1.4 Progress Metrics

The following waste has been staged for disposal as of October 12, 2012:

20 55-gallon drums of Haz basic vat bottom sludge

15 55-gallon drums of Haz acid vat bottom sludge

2 330-gallon totes of Haz cyanide containing liquid

3 55-gallon drums of Haz cyanide containing vat bottom sludge

3 Cubic-yard boxes of Haz cyanide solids

0 95-gallon overpacks of Haz cyanide solids

17 Cubic-yard boxes of Haz solids

2 330-gallon totes of Haz acid liquid

3 55-gallon drums Decon water

2 55 gallons drums of cyanide waste from incident

0 55-gallon drums of Haz neutral liquid

29 RCRA-empty vats (various sizes)

79 330-gallon tote metal frames (poly portion has been cut apart and placed in roll-offs)

1 330 gallon tote Haz base liquid

33 330 gallon tote Haz neutral liquid

48 55-gallon drums of Haz neutral solids

0 55-gallon drums of Haz base liquid

6 55-gallon drums of non-Haz neutral solids

3 330-gallon tote non-Haz neutral liquid

5 55-gallon drums acid liquid

2 330 gallon Haz oil/water mix

0 95 gallon drum Haz base liquid

Waste Disposal Information Table:

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	010413083JJK		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	010130168JJK		Vickery Environmental, Vickery, OH
Waste Corrosive Liquids, Acidic (UN3264)	9/10/12	1700 gallons	010413113JJK		US Ecology, Detroit, MI
Waste Corrosive Liquids, Basic (UN3266)	9/10/12	335 gallons	010413113JJK		US Ecology, Detroit, MI
Waste Corrosive Liquids, Acidic (UN3264)	9/10/12	1500 gallons	010413107JJK		US Ecology, Detroit, MI
Waste Chromic Acid (UN1755)	9/10/12	385 gallons	010413107JJK		US Ecology, Detroit, MI
Non-hazardous Liquids	9/14/12	4310 gallons	010413050JJK		US Ecology, Detroit, MI
Solid Waste Debris	9/14/12	30 CY	013		WM landfill, Wyatt, IN
Hazardous Waste Solid (NA3077)	9/18/12	15 CY	004354467FLE		US Ecology, Detroit, MI
Non-hazardous Liquids	9/19/12	4717 gallons	010413265JJK		US Ecology, Detroit, MI
Non-regulated material	9/24/12	400 pounds	010413339JJK		US Ecology, Detroit, MI
Non-Hazardous, Non D.O.T., regulated sludge, N/A	9/24/12	3140 pounds	010413339JJK		US Ecology, Detroit, MI
UN1564, RQ, Barium compounds, n.o.s., (Barium carbonate), 6,1,III	9/24/12	150 pounds	010413340JJK		US Ecology, Detroit, MI
Waste Corrosive Liquids, Basic (UN3266)	9/24/12	330 gallons	010413340JJK		US Ecology, Detroit, MI
Cyanide Waste (UN1935)	9/24/12	165 gallons	010413340JJK		US Ecology, Detroit, MI
Hazardous Waste Solid (NA3077)	9/24/12	15 CY	010413252JJK		US Ecology, Detroit, MI
Solid Waste Debris	9/25/12	30 CY	014		WM landfill, Wyatt, IN
Hazardous Waste Solid (NA3077)	9/27/12	15 CY	010413250JJK		US Ecology, Detroit, MI
Hazardous Waste Solid (NA3077)	10/01/12	18 CY	010413251JJK		US Ecology, Detroit, MI
Non RCRA Material (cyanide wastewater)	10/08/12	4811 gallons	010461892JJK		Vickery Environmental, Vickery, OH
Nonhazardous solids (Area E waste)	10/08/12	10 tons	016		WM landfill, Wyatt, IN
Solid Waste Debris	10/10/12	25 CY	015		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 October 15, 2012, the following activities are anticipated:

- Transport the source material from the September 14 incident for off-site disposal.
- Continue hazcat of miscellaneous small containers using improved hazard categorization procedures.
- Continue cleanup work in Areas E and Z.
- Evaluate the engineering report to determine cleanup options in Area W.
- Ship out hazardous waste for transportation off-site to a disposal facility as necessary.
- Assess options to access & manage wastes located in Area W.
- Consolidate / repack 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 chose facility as needed.
- Continue to submit waste profiles to selected disposal facilities as needed.
- Support US EPA Fields Team in a geophysical survey of site soils.
- Recycle scrap metal generated from clean-up operations.

2.2.2 Issues

NA

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

ERRS and START costs for the removal and emergency response actions will be incorporated into the project budget. For accounting purposes, the response costs will be tracked in separate subtask.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,300,000.00	\$998,500.00	\$301,500.00	23.19%
START	\$192,500.00	\$137,605.00	\$54,895.00	28.52%
Intramural Costs				
Total Site Costs	\$1,492,500.00	\$1,136,105.00	\$356,395.00	23.88%

* 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

ATSDR

Federal Occupational Health

South Bend HazMat

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	4
	Field Cost	1
	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
ERT	Environmental Response Team
ERRS	Emergency and Rapid Response Services
FCA	Field Cost Accountant
FOH	Federal Occupational Health
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
ATSDR	Agency for Toxic Substances and Disease Registry

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/BaycoteMetalFinishing

6.2 Reporting Schedule

POLREPS will be issued on a weekly or bi-weekly basis.

7. Situational Reference Materials

No information available at this time.