

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #21
Progress
Baycote Metal Finishing Site
C5B2
Mishawaka, IN
Latitude: 41.6497046 Longitude: -86.1648540

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From: Paul Atkociunas, OSC

Date: 10/19/2012

Reporting Period: October 15 - 19, 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 10/15/12. 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.
- EPA, START, and ERRS continued to monitor the source material from the September 14 incident. On Friday, October 19 the drums were shipped for off-site disposal; see Table below for details.
- Cleanup in Area Z continued. ERRS accessed and cleaned Vats Z28, Z29, Z30, Z31, Z32, Z33, Z34, Z67, Z68, and Z69. Sludges were collected for off-site disposal. ERRS cleaned / powerwashed the Vats, which were rendered unusable. ERRS continued to demolish process piping which was decontaminated and powerwashed. Rinsewaters were collected for off-site disposal.
- Several trailer loads of waste were shipped for off-site disposal; see Table below for details.
- Cleanup in Area E continued. ERRS powerwashed tank E7, which is located below grade in the the Northwest corner of the room. Rinsewater was collected for off-site disposal. ERRS backfilled the tank with washed / screened gravel to bring it to grade. Hazard Categorization, using improved procedure developed by ERRS was used with START oversight to determine the chemical characteristics of several unknown wastes in containers. EPA is supporting the HazCat work with additional air monitoring instruments.
- Cleanup in the HazCat 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 HazCat 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.
- Empty containers / equipment continued to be demolished and placed into the appropriate roll-off for off-site disposal.
- EPA FIELD'S Team conducted a geophysical survey of the field east of the building. Areas of concern are scheduled to be investigated during the week of October 22.
- The Engineering Structural Condition Report was reviewed. Recommendations will be implemented, as necessary. Telescopic floor jacks were procured to provide structural support in several areas.
- EPA demobilized the supplied air trailer.
- 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 approximately 42,700 pounds of scrap steel has been recycled. Water service / reusable dedicated water bottles saved approximately 3,100 disposable water bottles.

2.1.4 Progress Metrics

The following waste has been staged for disposal as of October 19, 2012:

24 55-gallon drums of Haz basic vat bottom sludge
 15 55-gallon drums of Haz acid vat bottom sludge
 1 330-gallon totes of Haz cyanide containing liquid
 4 55-gallon drums of Haz cyanide containing vat bottom sludge
 2 Cubic-yard boxes of Haz cyanide solids
 0 95-gallon overpacks of Haz cyanide solids
 19 Cubic-yard boxes of Haz solids
 0 330-gallon totes of Haz acid liquid
 2 55-gallon drums Decon water
 0 55 gallons drums of cyanide waste from incident
 0 55-gallon drums of Haz neutral liquid
 33 RCRA-empty vats (various sizes)
 83 330-gallon tote metal frames (poly portion has been cut apart and placed in roll-offs)
 1 330 gallon tote Haz base liquid
 29 330 gallon tote Haz neutral liquid
 18 55-gallon drums of Haz neutral solids
 0 55-gallon drums of Haz base liquid
 0 55-gallon drums of non-Haz neutral solids
 0 330-gallon tote non-Haz neutral liquid
 0 55-gallon drums acid liquid
 2 330 gallon Haz oil/water mix
 0 95 gallon drum Haz base liquid
 95-gallon overpack of Sodium Hydrosulfite
 2 55-gallon drums of Sodium Hydrosulfite
 95-gallon overpack of Hydrogen Peroxide
 2 55-gallon drums of Hydrogen Peroxide
 4 55-gallon drums of oil/water mix
 2 55-gallon drums of Flammable Liquids

Waste Disposal Information Table:

<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
Solid Waste Debris	7/18/12	30 CY	006		WM landfill, Wyatt, IN
Cyanide Waste (UN 1935)	7/31/12	3440 gallons	010411950JJJ		Dynecol Inc., Detroit, MI
Waste Toxic, Inorganic (UN 3288)	7/31/12	6400 pounds	010411950JJJ		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	010411037JJJ		Dynecol Inc., Detroit, MI
Acid Liquid (UN 3264)	8/02/12	1475 gallons	010411037JJJ		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	010411219JJJ		Dynecol Inc., Detroit, MI
Acid Liquid (Nitric, Chromium, Cadmium, UN 3264)	8/10/12	1320 gallons	010411079JJJ		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Hydrochloric, Sulfuric, Chromium, UN 3264)	8/10/12	1920 gallons	010411079JJJ		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	010411337JJJ		Dynecol Inc., Detroit, MI
Waste Acid Liquid (Nitric, UN3264)	8/17/12	790 gallons	010411337JJJ		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	010411359JJJ		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	010413023JJJ		US Ecology, Detroit, MI
Waste Toxic, Inorganic (UN3288)	8/27/12	2400 pounds	010413023JJJ		US Ecology, Detroit, MI
Cyanide Waste (UN1935)	8/27/12	2200 gallons	010413024JJJ		US Ecology, Detroit, MI
Non-hazardous Liquids	8/28/12	5465 gallons	010413028JJJ		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

Solid Waste Debris	10/17/12	30 CY	017		WM landfill, Wyatt, IN
Waste Corrosive Liquid, Acidic (UN3264)	10/19/12	750 gallons	010413694JJK		US Ecology, Detroit, MI
Calcium Hypochlorite, Hydrated (UN2880)	10/19/12	155 pounds	010413694JJK		US Ecology, Detroit, MI
Ammonia Solution (UN2672)	10/19/12	190 gallons	010413694JJK		US Ecology, Detroit, MI
Hazardous Waste Liquid (NA3082)	10/19/12	1595 gallons	010413689JJK		US Ecology, Detroit, MI
Waste Chromic Acid (UN1755)	10/19/12	110 gallons	010413689JJK		US Ecology, Detroit, MI
Waste Corrosive Liquid, Acidic (UN3264)	10/19/12	165 gallons	010413689JJK		US Ecology, Detroit, MI
Hazardous Waste Liquid (NA3082)	10/19/12	715 gallons	010413689JJK		US Ecology, Detroit, MI
Hazardous Waste Liquid (NA3082)	10/19/12	1800 gallons	010413688JJK		US Ecology, Detroit, MI
Hazardous Waste Liquid (NA3082)	10/19/12	2100 gallons	010413688JJK		US Ecology, Detroit, MI
Hazardous Waste Liquid (NA3082)	10/19/12	900 gallons	010413688JJK		US Ecology, Detroit, MI
Cyanides, Inorganic (UN1588)	10/19/12	500 pounds	010413688JJK		US Ecology, Detroit, MI
Non-hazardous Sludge	10/19/12	275 gallons	010413691JJK		US Ecology, Detroit, MI
Non-hazardous Sludge	10/19/12	55 gallons	010413691JJK		US Ecology, Detroit, MI

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 22, 2012, the following activities are anticipated:

- Continue HazCat of miscellaneous containers using improved hazard categorization procedures.
- Lab pack miscellaneous containers in the HazCat Area.
- Continue cleanup work in Areas E and Z.
- Move remaining wastes to Areas R, E and Z.
- Conduct an assessment / sampling of Area W to determine removal options.
- Ship out hazardous waste for transportation off-site to a disposal facility as necessary.
- 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.
- Investigate any anomalies / areas of concern identified by EPA FIELDS Team.
- 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	\$1,075,000.00	\$225,000.00	17.31%
START	\$192,500.00	\$143,300.00	\$49,200.00	25.56%
Intramural Costs				
Total Site Costs	\$1,492,500.00	\$1,218,300.00	\$274,200.00	18.37%

* 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	
	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.

POLREP #21 Last Updated 10/31/2012