U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Milwaukee Die Casting - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial
Milwaukee Die Casting
B5ZP
Milwaukee, WI
Latitude: 43.0956370 Longitude: -87.9051970

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From: Kathy Halbur, OSC
Date: 9/19/2013
Reporting Period: 5/17/2013-9/19/2013

1. Introduction

1.1 Background

Site Number:	B5ZP	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	12/3/2012
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	5/17/2013	**Start Date:**	5/17/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	WIN000510552	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time critical removal action; PRP lead (AOC Docket No. V-W-13-C-007)

1.1.2 Site Description

The Milwaukee Die Casting (MDC) Site is located at 4132 N. Holton Street in Milwaukee, Milwaukee County, Wisconsin. The Site is 3.7 acres. The 70,000 square foot building that housed the former Milwaukee Die Casting Company is the only structure on the Site. MDC produced aluminum and zinc alloy parts for a variety of industries, including automotive, small engine, and process control manufacturers. Phosphate ester oil (PEO), a fire retardant oil which contained polychlorinated biphenyls (PCBs), chlorinated solvents, and cyanide, was used and stored at the Site. Trichloroethylene (TCE) was also used and stored at the Site. A tunnel system is located under the die-casting room floor. The tunnel system provided access and utility lines to the die-casting machines. The tunnels are approximately 3-6 feet wide and up to 10 feet deep. Fluids collected in the tunnel system were discharged to an outdoor sump located near the northeastern wall of the building, which was connected to the sanitary sewer. Die casting operations at the Site ceased in 1997. The property owner died in June, 2009, abandoning the property. The City of Milwaukee foreclosed and assumed ownership of the Site, then transferred ownership to the Redevelopment Authority of the City of Milwaukee (RACM) in March, 2013.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results & Description of Threat

After securing an ex parte warrant from the United States District Court, Eastern District of Wisconsin in April, 2011, EPA conducted a Site Assessment that revealed the presence of elevated PCBs in the building, in the building's tunnel system, in the soils under the building and around the building, including on neighboring properties to the north and east of the Site, and in the groundwater on and off-site. Chlorinated solvents were also identified in soils on-site as well as in soils off-site and in the groundwater. Sub-slab air samples were above vapor intrusion action levels. Friable asbestos was identified in the building. Part of the roof has failed, allowing for storm water to enter the building. The Site is secured by a fence and the building is boarded up, however, evidence of trespassing was found inside and outside the building.

On December 13, 2011, the Wisconsin Department of Natural Resources (WDNR) conducted a subsequent investigation of the Site's perimeter. During the inspection, WDNR detected an additional area of off-site soil contamination on the neighboring property to the east of the Site. Evidence of access to the property under the perimeter fence was documented in this same area. WDNR also identified a make-shift weir (wooden board) at the end of a sewer lateral leading from the eastern side of the building to the City of Milwaukee storm sewer. A sample of the liquid dammed behind the board was collected by WDNR and analyzed by EPA (at WDNR's request). The sample was an oily water which separated in the sample jar. The PCB concentration of the oil portion of the sample was 410,000 mg/kg. The storm sewer where the sample was collected ultimately discharges to the Milwaukee River, located less than ¼ mile to the east.

On February 2, 2012, EPA removed the oily water in the lateral immediately behind the dam and conducted video surveillance of the lateral in an attempt to identify the source of the oil. However, the source could not be identified. On May 29, 2012, EPA re-evaluated the manhole, lateral, and weir. The wooden board was still in place and oily water had reaccumulated behind the board. A sample of the reaccumulated material had a PCB concentration of 220,000 mg/kg.

On May 3, 2012, the Wisconsin Department of Health Services (WDHS) issued a Health Consultation for the Milwaukee Die Casting Site that concluded that the conditions at the Site pose immediate, medium term, and long-term public health concerns.

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

EPA and Respondents (Pharmacia LLC and Fisher Controls International LLC) finalized an Administrative Order on Consent (AOC) for a time critical removal action on March 12, 2013. Per the schedule in the AOC, the first work plan was submitted on April 9, 2013. Site stabilization activities (around the clock on-site security) began on May 17, 2013. During May-August, 2013, site preparation and stabilization activities, such as removal of an unstable/leaning trailer, reinforcing the perimeter fence, and vegetation clearing occurred. A significant amount of additional characterization sampling (soil, groundwater, building, etc) also occurred during this period.

On September 17, 2013, the property was disconnected from the City of Milwaukee storm sewer system, thereby stopping an ongoing discharge of PCBs from the Site. Two laterals were abandoned at the property line and respective manholes. The "mid-central lateral", which was found to have an uncontrolled source of high concentration PCB liquid waste in it, was cleaned, excavated, and containerized for disposal as TSCA regulated waste. Two additional camera surveys were conducted to attempt to determine the source of the oily material. The source was not identified.

On September 18, 2013, the sewer work was completed and interim storm water management measures were put into place. The downstream half of the property is surrounded by silt fencing and hay bales to filter sheet flow leaving the Site. Two pumps and water storage capacity of 80,000+ gallons were put into place to collect storm water from rain events.

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

This removal action is being conducted in accordance with AOC Docket No. V-W-13-C-007. Respondents are Pharmacia LLC and Fisher Controls International LLC.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Tires	Solid	19.66 tons	NA	Recycling	Liberty Tire Recycling, Auburndale, WI
Metal (from trailer)	Solid	40 cu. yd rolloff	NA	Recycling	Midwest Forman Recycling, Milwaukee, WI
Vegetation	Solid	20.36 tons	NA	Landfill	Advanced Disposal Emerald Park Landfill Muskego, WI
IDW	Solid & Liquid	TBD	TBD	TBD	TBD
PCB Contaminated Soil	Soild	TBD	TBD	TBD	TBD
Sewer Cleaning Wastewater	Liquid	TBD	TBD	TBD	TBD

2.2 Planning Section

2.2.1 Anticipated Activities

Work plans are expected soon for off-site soil excavation and building demolition (schedule dependent upon sampling results). Respondents are expected to submit a 761.61(c) application for a risk-based PCB clean-up level for on-site soil contamination no later than November 30, 2013. The Milwaukee Fire Department is planning training exercises to occur at the Site in October, 2013 and immediately prior to building demolition.

2.2.2 Issues

There have been numerous delays impacting the speed and progress of the removal action, such as difficulty obtaining off-site access, slow groundwater recharge, quality issues with the selected contract lab, and unanticipated sample results.

2.3 Logistics Section

Nothing to report at this time.

2.4 Finance Section

Nothing to report at this time.

2.5 Other Command Staff

Not applicable

3. Participating Entities

3.1 Cooperating Agencies

Milwaukee Fire Department
Redevelopment Authority of the City of Milwaukee
Wisconsin Department of Health Services
Wisconsin Department of Natural Resources

4. Personnel On Site

EPA: 2
START: 2
Respondents & Contractors: 30
City of Milwaukee: 1
WDNR: 1

5. Definition of Terms

Not applicable

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/MDC
www.eap.gov/region5/cleanup/milwaukee/index.html

6.2 Reporting Schedule

Polreps will be issued as significant events are completed.

7. Situational Reference Materials

R5 Priorities Summary		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	0
	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	0
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Acres Protected	4
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	TBD
	Number of workers on site	TBD
Contaminant(s) of Concern		
Contaminant(s) of Concern	PCBs, chlorinated solvents, asbestos, PM	