

**United States Environmental Protection Agency**  
**Region V**  
**POLLUTION REPORT**

**Date:** Tuesday, December 14, 2004

**From:** JJ Justice

**To:** Larry AuBuchon, MDEQ

Joe Walczak, MDEQ

**Subject:** MIF On-going Removal Action - Polrep 2

Michigan Industrial Finishes  
9045 Vincent, Hamtramck, MI  
Latitude: 42.3956000  
Longitude: -83.0425000

<b>POLREP No.:</b>	2	<b>Site #:</b>	B58W
<b>Reporting Period:</b>	12/13/04 to 12/21/04	<b>D.O. #:</b>	0020
<b>Start Date:</b>	12/7/2004	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	12/6/2004	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	MIN000509131	<b>Contract #</b>	68-S5-03-01
<b>RCRIS ID #:</b>			

**Site Description**

1. Site Location

See Initial Polrep.

2. Description of Threat

See Initial Polrep.

**Current Activities**

1. Current Situation

U.S. EPA, START and ERRS personnel mobilized to site on December 6, 2004 in order to begin staging, sampling and dispose of drums and other containers located at the MIF property. ERRS continues to accumulate and stage drums and small containers in preparation for hazardous categorization. Work continues in the manufacturing building to prepare a work area for sampling of drums. Metal scrap and unnecessary equipment has been disassembled and moved out of the work area. ERRS has completed the rinsing of 699 empty drums for disposal and the staging of approximately 700 drums for sampling.

2. Removal Activities to Date

On December 13, 2004, ERRS began clearing out the Manufacturing Building to make room for the staging of drums for sampling. Air monitoring recorded carbon monoxide (CO) levels as high as 70 ppm in the manufacturing building in the drum staging area. Work was stopped and the area ventilated by opening bay doors and engaging 3 ventilation fans.

On December 14, 2004, ERRS continued clearing out staging area and staging drums for sampling in the manufacturing building. Air monitoring recorded CO concentrations at 22 ppm. Engineering controls were implemented to lower the CO concentrations to below 10 ppm. In addition, the propane forklift

used for staging of drums will be replaced with an electric forklift.

On December 15, 2004, ERRS loaded 288 empty and rinsed drums for transportation and disposal at Maxi Container, Inc. ERRS continued to stage drums and clear the manufacturing building of unused equipment.

On December 16, 2004, ERRS continued staging of drums in Manufacturing Building and began accumulating additional empty drums and small containers.

On December 17, 2004, ERRS loaded 264 drums and one skid each of drum lids and rings for transportation and disposal at Maxi Container, Inc. ERRS completed the staging of approximately 700 drums for sampling in the Manufacturing Building. ERRS continued small container collection and rinsed out 8 empty drums. START began numbering and preparing a drum inventory of all the staged drums. U.S. EPA obtained a signed access agreement from the owner of the empty lot where MIF has staged two trailers full of drums. The owner of the lot will provide U.S. EPA with the results of a Phase I investigation of the lot that was conducted 3 years ago that included surface and subsurface soil sampling.

On December 18, 2004, ERRS continued small container collection and began construction of decon line in the Manufacturing Building. Numbering and inventorying of staged drums continued.

On December 20, 2004, drum inventorying of first 707 staged drums was completed. General debris cleanup was completed. Large totes and vats were relocated to create additional workspace for drum staging and sampling.

On December 21, 2004, 147 empty and rinsed drums were transported off-site for disposal. ERRS Health and Safety Staff conducted an audit of the site. Additional lighting will be added to work areas in the Warehouse Building and the Health and Safety Plan will be amended to address task specific personal protective equipment requirements.

#### **Planned Removal Actions**

- Inventory, stage, sample, hazcat and dispose of all 55-gallon drums and small containers.
- Drain, rinse and render unusable all AST's, tanks, vats, totes and process vessels.
- Remove all visibly impacted soils and collect soil samples to determine extent of soil contamination.
- Rinse and dispose of all empty drums.
- Transport all wastes off site to a CERCLA compliant facility.

#### **Next Steps**

- Continue to rinse and dispose of all empty drums.
- Prepare site for staging and sampling of drums.
- Consolidate all small containers.
- Lab pack all materials from laboratory.
- Assess soils for impacts from spilled material.

#### **Key Issues**

Amend Action Memo to define the Michigan Industrial Finishes Site as including the non-adjacent empty lot used by MIF to store drums and to include the sampling and excavation of any contaminated soils due to evidence of historical spills/leakage.

#### **Disposition of Wastes**

Waste Stream	Quantity	Manifest #	Disposal Facility
Empty Drums	288	N/A	Maxi Conatiner
Empty Drums	264	N/A	Maxi Container
Empty Drums	147	N/A	Maxi Container