

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lawrence Hardware - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Lawrence Hardware
C5X6
Sterling, IL
Latitude: 41.7864543 Longitude: -89.6937013

To:
From: Ramon Mendoza, On-Scene Coordinator
Date: 5/12/2014
Reporting Period: 5/6/2014 to 5/8/2014

1. Introduction

1.1 Background

Site Number:	C5X6	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/1/2014	Start Date:	4/29/2014
Demob Date:		Completion Date:	
CERCLIS ID:	ILN000501562	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency

1.1.2 Site Description

The facility was operated by Lawrence Hardware, Inc. until 2006, when the Site was closed and abandoned. Lawrence Hardware, Inc. historically manufactured numerous products including metal door hinges, hinge pins, steel barn door hangers, bolted wheelbarrows, hay fork pulleys, and nails. On-site operations included wastewater treatment, plating, machining, and paper box manufacturing. The City of Sterling, Illinois acquired the Site through an involuntary taking due to delinquent taxes and is the current owner. The Site is part of a continued downtown development for the City of Sterling. The Site consists of one multi-story building that occupies approximately 3.5 acres and a railroad spur located north of the building. The Site is bordered to the north by a Union Pacific Railroad, with commercial and industrial properties and East 2nd Street beyond; to the east by undeveloped land; to the south by the Rock River with the City of Rock Falls, Illinois beyond; and to the west by 1st Avenue/Illinois Route 40 with industrial properties beyond.

1.1.2.1 Location

The Site is located at 2 1st Avenue, Sterling, Whiteside County, Illinois. **Figure 1-1** shows the Site location. The Site's approximate geographical coordinates are 41°47'11.31" North latitude and 89°41'32.28" West longitude.

1.1.2.2 Description of Threat

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site was referred to EPA after fire fighters discovered hazardous waste in response to an arson fire caused by trespassers in August 2013. EPA conducted its site assessment in Dec. 2013 and documented the following:

At least two drums of Sulfuric acid, Lab waste including cyanide, containers of reactive waste, solvents, at least 12 drums of contaminated used oil;. The site assessment also noted the presence of very old transformers on-site. In addition there are at least three industrial size mercury switches.

On April 4, the City of Sterling reported another break-in by trespassers at the Site and EPA consequently decided to conduct an Emergency Removal action to prevent a release of hazardous substances to the community and to prevent anyone from being exposed to the hazardous substances on-site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA OSC and Removal Contractor conducted a site walk-through to plan for the mobilization on 4/29/14. After one day of preparation and logistics EPA and ERRS contractors mobilized to the site on 5/1/14.

2.1.2 Response Actions to Date

EPA OSC provided air monitoring (LEL, O₂, Sulfuric Acid, HCN, H₂S, and VOCs) during the entire period from 5/1 to 5/8 2014.

Response actions From 5/1 through 5/5 are documented in Polreps #1 and #2

From 5/6 to 5/8 The following response actions were taken:

- Completed Hazard categorization of containers containers container hazardous or suspected hazardous substances.
- Completed collection, consolidation, and packaging of hazardous materials and contaminated used oil at the Site, including lab related waste, paints, solvents, flammables etc..
- Collected and secured all mercury switches
- Test results confirmed the presence of a small amount of asbestos pipe insulation which fell on the floor (about 1 cubic foot). This was collected and secured for disposal.
- Test results confirmed the presence of PCB contaminated oil from 12 intact suspected PCB transformers plus one transformer which fell off its mount and spilled oil on the ground (spill is historical) at low concentrations. PCBs were detected from 5.4 to 44 mg/kg. Consequently all the transformer oil was drained for disposal. 13 transformer carcasses were left in place.
- A composite soil sample was collected in the area where one transformer fell down (historical spill) to determine the nature of PCB contamination.
- To protect water quality and the mussel beds in the Rock River (River), The doors to the room which contained about 100 cubic yards of non-hazardous ash were secured with sand bags and plywood to prevent any ash from being released into the Rock River under a flood scenario.
- Containerized wastes were collected, placed, and locked in a secure steel container onsite for transport and disposal at a later date (estimate within two weeks).
- The OSC conducted a site walk through with the City Manager , on 5/8/2014, and briefed him on what was done and that the EPA would be back in a couple of weeks to pick up the steel container.
- EPA OSC and ERRS Crew temporarily demobilized from the Site by about 1600 hours on 5/8/2014.

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

- EPA is currently investigating the past ownership and operators of the Site and is planning to send out information request letters under CERCLA.

2.1.4 Progress Metrics

The following waste streams have been collected, tested, consolidated and secured in a locked steel container onsite for transport and disposal :

Waste Stream	Quantity
1. Acid Liquids	3 drums
2. Contaminated Used Oil	11 drums
3. Ferrocyanide	1 pail
4. Boiler Cleaner(sodium Bisulfite)	1 pail
5. Sodium Hydrosulfide	50 lb
6. Antifoam	1 drum
7. Neutral Liquids	2 drums
8. Spray Booth Filters	2 drums overpacked
9. Latex Paint	1 cubic yard box
10. Oil Base Paint	1 cubic yard box
11. Oxidizer lab pack	1 pail
12. Base Liquids	1 drum
13. Low Level PCB Transformer Oil	13 drum
14. Mercury Switches	1 pail
15. Asbestos waste	1 cubic ft.
16. RCRA Empty Containers, Debris and non-haz Solids	20 yds

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Complete the process for : waste profile determinations, transport, disposal of wastes collected onsite.
- Evaluate the results of the soil sample and determine appropriate response.
- Remobe to the Site to pick up the wastes for transport and disposal to CERCLA approved waste disposal facility (or facilities) .Estimated return date is in within two weeks.

2.2.1.2 Next Steps

- Section previous section 2.2.1.1

2.2.2 Issues

EPA OSC requested that the City Police Department check in on the locked steel container onsite to make sure no-one has tampered with the locks. The City manager indicted that they will do this.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

All personnel read and signed the Site Specific Health and Safety Plan.

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

None at this time. No media interest as this time.

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Sterling
Illinois EPA

4. Personnel On Site

1- OSC

ERRS contractors (EQM):

3- Laborers

1 - Removal Manager

1 - Chemist/T&D coordinator

1 - Accountant (off-site)

All Personnel demobed form the site on 5/8/2014

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.