

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #4  
Final  
Lawrence Hardware  
C5X6  
Sterling, IL  
Latitude: 41.7864543 Longitude: -89.6937013

**To:**  
**From:** Ramon Mendoza, On-Scene Coordinator  
**Date:** 6/16/2014  
**Reporting Period:** 5/9/2014 to 6/10/2014

## 1. Introduction

### 1.1 Background

|                            |              |                                |                |
|----------------------------|--------------|--------------------------------|----------------|
| <b>Site Number:</b>        | C5X6         | <b>Contract Number:</b>        |                |
| <b>D.O. Number:</b>        |              | <b>Action Memo Date:</b>       |                |
| <b>Response Authority:</b> | CERCLA       | <b>Response Type:</b>          | Emergency      |
| <b>Response Lead:</b>      | EPA          | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL      | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  | 5/1/2014     | <b>Start Date:</b>             | 4/29/2014      |
| <b>Demob Date:</b>         | 6/10/2014    | <b>Completion Date:</b>        | 6/10/2014      |
| <b>CERCLIS ID:</b>         | ILN000501562 | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |              | <b>State Notification:</b>     |                |
| <b>FPN#:</b>               |              | <b>Reimbursable Account #:</b> |                |

#### 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 2<sup>nd</sup> 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 1<sup>st</sup> Avenue/Illinois Route 40 with industrial properties beyond.

##### 1.1.2.1 Location

The Site is located at 2 1<sup>st</sup> 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 two 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

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

Response action from 5/6 to 5/8/2014 are documented in Polrep #3

From 5/9 to 6/7/2014 - ERRS contractor and OSC conducted the following off-site activities:

- Evaluated analytical results for waste profiles and soil characterization. The results from a composite soil sample, collected in May at the area where one transformer fell down and leaked (historical), were non-detect for PCBs. Consequently no soil removal or further action was undertaken.
- Waste Profiles were prepared and sent to disposal companies for bid.
- CERCLA approved disposal facilities were identified
- City of Sterling was kept informed of the situation.
- Schedule for pickup and disposal was arranged.

From 6/8 to 6/10/2014, the following onsite response actions were taken:

- From 6/8-9/2014, ERRS contractors remobilized to the Site (includes vehicles, personnel, skid steer, and rolloff box).; Cutup RCRA empty drums and prepared drummed waste for transport.
- On 6/10/2014, EPA OSC (Atkociunas) mobilized to the Site. In addition to review and signing of the shipping manifests, he oversaw ERRS contractors as they completed the packing, loading, and transport off-site all previously inventoried solid and hazardous waste for disposal at CERCLA approved facilities. A small oil spill (1 quart) was discovered inside the container and was cleaned up. The leaking drums were overpacked. The mercury material was recycled.. All equipment and ERRS crew were demobilized the same day.

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

- EPA is currently investigating the past ownership and operators of the Site.

#### 2.1.4 Progress Metrics

The following waste streams have been collected, tested, consolidated, then transported and disposed (unless noted) off-site.

| Waste Stream                            | Amount/Volume                  | Manifest #    | Disposal Facility  | Comments   |
|---|--------------------------------|---------------|--|--|
| Latex Paint                             | 1 cubic yard Box               | 013010735 JJK | Petro-Chem Processing Group421 Lyncaste Detroit, MI (PCPG) |  |
| Acid Liquids                            | 3-55 gallon drums              | 013010735 JJK | PCPG   |  |
| Neutral Liquids                         | 2-55 gallon drums              | 013010735 JJK | PCPG   |  |
| Spray booth Filters                     | 2-55 gallon drums in overpacks | 013010735 JJK | PCPG   |  |
| Oxidizer Lab pack                       | 1-5 gallon pail                | 013010735 JJK | PCPG   |  |
| Base liquids                            | 1-55 gallon drum               | 013010735 JJK | PCPG   |  |
| Non-PCB Transformer Oil (< 50 ppm PCBs) | 13-55 gallon drum              | 013010735 JJK | PCPG   |  |
| Contaminated Used Oil                   | 11-55 gallon drums             | 013010735 JJK | PCPG   | 2 were leaking inside the steel container (1 quart spill) and were over-packed for transport (spill was cleaned up). |

|                                       |  |               |   |                                 |
|---------------------------------------|--|---------------|---|---------------------------------|
| Viking Foam(Antifoam)                 | 1-55 gallon drum   | 013010735 JJK | PCPG  |                                 |
| Boiler Cleaner                        | 1-5 gallon pail  | 013010735 JJK | PCPG  |                                 |
| Ferrocyanide Lab Pack                 | 1-5 gallon pail  | 013010735 JJK | PCPG  |                                 |
| Oil Base Paint                        | 1 cubic yard box   | 013010735 JJK | PCPG  |                                 |
| Friable Asbestos Insulation           | 1- 5 gallon pail   | 013010735 JJK | PCPG  |                                 |
| Sodium Hydrosulfite                   | 1-30 gallon drum   | 013010735 JJK | PCPG  | Over-packed in a 55 gallon drum |
| RCRA Empty Containers and Solid Waste | 1 ton (roll off box)   | LH001         | Republic Services Landfill, Dixon, IL               |                                 |
| Mercury Switches                      | Includes two industrial size switches and 5 home-sized switches (estimate 3-5 ounces). |               | Waste Management Mercury Solutions, Union Grove, WI | Elemental Mecury was recycled.  |

| Regional Metrics  |  |  |
|---|--|--|
| This is an Integrated River Assessment. The numbers should overlap. | Miles of river systems cleaned and/or restored   | N/A  |
|   | Cubic yards of contaminated sediments removed and/or capped  | N/A  |
|   | Gallons of oil/water recovered   | 715 gallons of PCB contaminated transformer oil and 605 gallons of contaminated used oils recoverd.    |
|   | Acres of soil/sediment cleaned up in floodplains and riverbanks  | N/A  |
| Stand Alone Assessment  | Number of contaminated residential yards cleaned up  | Not applicable   |
|   | Number of workers on site  | 5  |
| Contaminant(s) of Concern   | Mercury, Ferrocyanide, Sulfuric acid, reactive (sodium hydrosulfite), PCB contaminated transformer oil, contaminated used oil, oxidizers |  |
| Oil response Tracking   |  |  |
| Estimated volume  | Initial amount released  | N/A  |
|   | Final amount collected   | N/A  |
| CANAPS Info   | FPN Ceiling Amount   | N/A  |
|   | FPN Number   | N/A  |
|   | Body of Water affected (Rock River was threatened)   | N/A  |
| Administrative and Logistical Factors (Check X where applicable)    |  |  |
| q Precedent-Setting HQ Consultations (e.g., fracking, asbestos) (No | q Community challenges or high involvement, Yes. Trespassers and arson precipitated the need for ER under CERCLA                         | q Radiological - No.   |
| q More than one PRP, Enforcement Investigation underway             | q Endangered Species Act / Essential Fish Habitat issues, State Threatened mussels in Rock River are a receptor.                         | q Explosives, No.  |
| q AOC, No   | q Historic preservation issues, No.  | q Residential impacts, downtown area of Sterling is mixed industry/residential.                        |
| q UAO, No   | q NPL site, No   | q Relocation, No   |
| q DOJ involved, No  | q Remote location, No.   | q Drinking water impacted, No  |
| q Criminal Investigation Division involved, No                      | q Extreme weather or abnormal field season, No   | q Environmental justice, No.   |
| q Tribal consultation or coordination or other issues, N/A          | q Congressional involvement, No.   | q High media interest, No.   |
| q Statutory Exemption for \$2 Million, N/A                          | q Statutory Exemption for 1 Year, No.  | q Active fire present, Yes (Arson and Threat of Arson.)  |
| q Hazmat Entry Conducted – Level C                                  | q Incident or Unified Command established No.  | q Actual air release (not threatened), Yes, unknown haz substances, during arson fire in August. 2013. |

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

#### **2.2.1.1 Planned Response Activities**

##### **- 2.2.1.2 Next Steps**

Notify the City and Illinois EPA of the completion of the emergency removal action.  
Prepare an Action Memo for approval.

### **2.2.2 Issues**

None.

## **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**

All Personnel demobed from the site permanently on 6/10/2014

## **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.