

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Highland Plating Fire - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #1
Initial Pollution Report For the Highland Plating Site
Highland Plating Fire
A963
Los Angeles, CA
Latitude: 34.0891180 Longitude: -118.3419480

To: Harry Allen IV, Emergency Response Section
Trevor Anderson, Cal Emergency Management Agency
Craig Benson, EPA Region 9
Peter Guria, EPA Region 9
Barbara Lee, EPA Region 9
Lance Richman, EPA Region 9
Celeste Temple, EPA Region 9
Robert Wise, EPA Region 9
Craig Whitenack, EPA Region 9
Mario Tresieras, LA County Health Hazmat
Andrew Helmlinger, EPA
Gonzalo Barriaga, LAWSP
Howard Wong, LAWSP
Chris Meyer, Westin
Francisco Castro, Los Angeles Sanitation
George Baker, DTSC
Jean Schumann, EPA
Nick Karno, City Attorney

From: OSC Robert Wise and OSC Will Duncan

Date: 7/17/2014

Reporting Period: 7/13/2014 Thru 7/17/2014

1. Introduction

1.1 Background

Site Number:	A963	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	N/A
Mobilization Date:	7/13/2014	Start Date:	7/13/2014
Demob Date:		Completion Date:	
CERCLIS ID:	CAN000900173	RCRIS ID:	N/A
ERNS No.:	N/A	State Notification:	
FPN#:	N/A	Reimbursable Account #:	

1.1.1 Incident Category

The Highland Plating Site is an Emergency Response.

1.1.2 Site Description

The Highland Plating Site is located at 1001 N. Orange Drive, Los Angeles, CA 90038 (Latitude: 34.0891180; Longitude: -118.3419480). Highland Plating is an electroplating and anodizing shop. It conducted chrome, nickel, copper, and gold plating as well as anodizing. The site consists of two buildings that cover approximately 33,000 square feet. Highland plating is bordered on the north by a parking lot, to the east by Orange Drive, to the south by Romaine Street and to the west by Sycamore Street. The fire damaged building is bordered by Orange Drive and Romaine Street. This building is unreinforced masonry. The roof of this structure is completely destroyed, has collapsed into the building on top of one or more of the plating lines. The brick are permeated with chromic acid which is visible from Romaine Street, making the brick themselves structurally unsound. The building has been red tagged by the City of Los Angeles Building and Safety Department.

The structure that is bordered by Sycamore had minimal fire damaged, but houses a large amount of plating chemicals. Highland Plating was in the process of being closed and the plating lines were in the process of being dismantled. Many of the waste plating solutions were being stored in this building awaiting disposal. There is also a large quantity of plating solids inside this structure both contained in supersets and triwall boxes as well as still present in the berms of the former waste water treatment system area.

The site is located in the "Hollywood Media District" which consists of mixed commercial/residential district that includes movie production studios, retail stores, restaurants, commercial buildings and residential. To the north, east and south of the site are commercial buildings. To the east is a concrete company.

There are no nearby bodies of water but there are storm drains which convey surface runoff from the immediate area to the Ballona Creek and Estuary, an 8.8-mile-long waterway in southwestern Los Angeles County. There are storm drain culverts at the intersection of Sycamore and Romaine Streets that were impacted by contaminated fire suppression water. The Ballona wetlands is connected to the Ballona Estuary by tide gates which were closed by the order of the California Department of Fish and Wildlife during the fire.

1.1.2.1 Description of Threat

Current site conditions pose the threat of an on-going and potential future releases of CERCLA hazardous substances, namely metal plating process wastes including cyanide liquids, acids (chromic, nitric, hydrofluoric, hydrochloric), caustic (sodium hydroxide) and metals (nickel, gold, copper, chrome). The likelihood of direct human exposure, via direct contact and/or inhalation of hazardous substances, and the threat of potential future releases and migration of these substances, poses an imminent and substantial endangerment to public health and/or welfare, or the environment based on the factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415(b)(2).

In the western building that is bordered by Sycamore contains a large quantity of production chemicals and waste generated during the closure process and the fire response. The production chemicals are being sold to another plating shop for reuse. The cyanide plating vat liquids that were pumped into poly storage totes are currently being stored in this building awaiting disposal. The other plating waste generated during the closure of the plating shop is currently stored in a number of drums, totes, supersacks and triwall containers. Some of the totes appear to be leaking.

The secondary containment for the plating lines was bordered by a series of trenches that drained to the waste water treatment system. These trenches are also present in the western building. These trenches were pumped by the contractor for the PRP on July 16, 2014, however on July 17, 2014, OSCs Wise and Duncan observed that they had filled back up again. The liquid appeared to be concentrated chromic acid. It is unknown if the liquids is coming from the fire damaged plating lines or from another source.

Exposures to cyanide and chromium are an identified contact hazard (dermal and inhalation). The current storage in the burn out plating facility pose a risk of exposure to occupants of the surrounding businesses and the casual trespasser. According to Agency for Toxic Substance Disease Registry (ATSDR), exposure to high levels of cyanide harms the brain and heart, and may cause coma and death. Exposure to lower levels may result in breathing difficulties, heart pains, vomiting, blood changes, headaches, and enlargement of the thyroid gland. The accessible cyanide vats have been pumped into 250 gallon totes, but due there are still drums of cyanide inside the structure.

Chromium(VI) and chromium(III) are used for chrome plating. Chromium is known to be a human carcinogen. According to ATSDR, Breathing high levels of chromium(VI) can cause irritation to the lining of the nose, nose ulcers, runny nose, and breathing problems, such as asthma, cough, shortness of breath, or wheezing. The concentrations of chromium in air that can cause these effects may be different for different types of chromium compounds, with effects occurring at much lower concentrations for chromium(VI) compared to chromium(III).

The plating building structure is currently red tagged (condemned) by the Los Angeles City Building Department as unsafe. There are several plating lines buried under debris from the collapsed roof throughout the plating lines whose condition and stability are unknown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On the morning of July 13, 2014 (Sunday), a fire began at the Highland Plating. The fire was contained to the plating building bordering Orange Drive. Over 130 LA firefighters defended the fire and it was ultimately extinguished sometime in the morning of July 14. A huge smoke plume lasted all morning and recurred briefly in the evening. Over 1 million gallons of water was used to fight the fire. Significant amounts of runoff water containing plating solutions were released from the building. Aggressive containment efforts were implemented in the streets bordering the northwest and east sides of the building although some material did enter the storm drain.

The Los Angeles County Health Hazardous Materials Division (Health Hazmat) requested EPA assistance in overseeing cleanup efforts. OSC Robert Wise arrived at the site at approximately 2030 hours on July 13, 2014 to assess the scene. After participating in the Unified Command Briefing, OSC Wise demobilized to the EPA office to collect equipment and remobilized arriving at approximately 0100 hours of July 14, 2014. OSC Wise integrated into the Unified Command which was being lead by the City of Los Angeles Fire Department (LAFD). EPA joined with Health Hazmat, California Department of Fish & Wildlife (DFW), and City of Los Angeles Watershed Protection (LAWSP) in to assess the reach of contaminated water runoff. Some impacted storm drains flow to the Ballona Creek wetlands. This area was assessed by biologists from DFW and determined to not be impacted. Sampling by LAWSP has documented that metals concentrations in Ballona Creek were at background levels.

EPA also initiated an air surveillance program which consisted of air monitoring for total volatile organic compounds (VOCS), carbon monoxide and total hydrogen cyanide (HCN) and air sampling for acid gases, HCN and total metals. The air monitoring did not detect any significant concentrations of any of the compounds of concern. The air sampling data is pending. The START is preparing an after action Quality Assurance Sampling Plan (QASP), Emergency Data Quality Objectives Plan (DQO) and a Data Management Plan (DMP). The South Coast Air Quality Management District also collected three SUMA canisters with the data pending.

The City of Los Angeles Industrial Waste (LAIW) initiated sampling of the sewer on 07/14/2014 with a grab sample and the installation of an ISCO samplers to collect daily samples for metals. With the exceptions of the day of the fire, no elevated contaminants have been found.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The Emergency response activities at the Highland Plating site involve providing oversight of the PRP cleanup activities. Unified Command was instituted at the incident and an Incident Action Plan (IAP) was drafted by the PRPs contractor. Daily Incident briefings were summarized in ICS forms. Forms 201 and 204 were distributed to unified command each day.

2.1.2 Response Actions to Date

July 13 - 14, 2014; Monday

OSC Robert Wise mobilized with START to the Highland Plating Facility in Los Angeles, CA. The facility has been on fire since Sunday morning. The local lead agencies are LAFD, LAWSP and Health Hazmat. Upon arrival OSC Wise noted water and plating solutions (primarily chromic acid) leaking from the building doors located on the west side of the property (N. Sycamore Drive) and south side of the property (Romaine Street). A large quantity of this runoff ran directly into the storm drain. Chromic Acid was confirmed in the storm drain system, but the direction of flow in the underground system had not been determined. EPA initiated an air surveillance program that included the collection of air samples for HCN, acid gases and metals. Real time air monitoring for HCN was conducted with the Area Raes and Pac-3.

The property/building owners, (PRP), hired environmental contractors (Enviroserv and Patriot) to begin clean up activities. The contractors also worked with LASWP to assess the impact to the storm drain. The environmental contractor began collecting runoff behind temporary earthen dikes and pumping the runoff from the gutters into temporary storage tanks. Once the fire was out, the contractor also transferred cyanide liquids from open vats along the north interior wall of the plating facility into temporary storage totes. Bags of cyanide solids were left in place due to the lack of stability/integrity of the burned structure. The bags of cyanide were stabilized in-place and the enclosure they were in was temporarily fortified in case of worst-case scenario event (rain, earthquake, etc.).

Patriot composed and maintained the IAP for the environmental cleanup operations during the fire.

July 15, 2014; Tuesday

OSC Duncan arrived on site and met with Health Hazmat, LAWSP, Enviroserv and Patriot. The primary activity for the morning was to transfer all liquids that had been contained in street into temporary storage containers. Most of these liquids have a low pH and contain various metals including chrome, nickel and copper. Material was collected into 7 x 4300 gallon Baker tanks and stored on the street near the corner of N. Orange Drive and Romaine Street to await disposal. Once the liquids had been transferred, Enviroserv began loading contaminated sands (used for containment dikes) into 20-yard roll-off bins. A total of seven roll-off bins were filled with sand. Samples were collected from the roll-off bins and each Baker tank stored on the street and were sent to a laboratory for analysis. The analytical data and will be used to profile the wastes and transport them off-site to an appropriate disposal facility. The 7 totes of cyanide solutions, roughly 260gals each (approximately 1820 gallons total) were moved from the street into a stable portion of the building.

In addition to cleaning streets, Enviroserv also worked on preventing the on-going overflow of secondary containment inside the burned building. Enviroserv worked with facility employees to identify drain lines that could be plugged to prevent secondary containment draining into trenches and channels that were overflowing and draining to the outside of the building. All the water, which overflowed and spread out in the building, was collected and transferred into an 8th Baker tank. Although they were successful in stopping the continuous discharge from the building, the plugs and containment will be evaluated over the next several days to make sure the threat was successfully resolved.

Impact to Ballona Creek/wetlands was not determined because data from CUPA/Watershed protection of stormwater runoff from the site is not yet available. Down-gradient of site (Firmosa and Willoughby) there is a large construction project with a NPDES permit, dewatering site, buffers out any acidic conditions that may have been present from the Highland Plating Facility runoff. Volume of water from highland plating is diluted by the NPDES-permit facility, however metals contamination is still unclear.

Street cleaning activities are planned to continue through the night. Enviroserv will pressure wash the impacted sections of Romaine Street and N. Sycamore Drive as well as three parking spaces in the northwest section of the parking lot that borders the facility and may have been impacted by run-off.

Following the street washing, Health Hazmat agreed to conduct XRF in situ metals analysis using the Niton XRF to verify, that the streets were cleaned to an acceptable level.

Finally, the Stormdrains between Romaine/Sycamore (on-site) and Willoughby/LaBrea(Firmosa) will be flushed out during night operations.

July 16, 2014; Wednesday

Last night Enviroserve finished cleaning the street (Romaine and Sycamore) and used approximately 2500 gallons of water to flush stormdrains. Watershed protection deemed the flushing activities to be sufficient and called for no further action concerning the cleaning of the stormdrains.

During the night the secondary containment inside the facility began to overflow again. Fortunately the material was captured prior to releasing into the street. The secondary containment overflow issue will be monitored on a daily basis going forward during this phase of the stabilization and until removal activities are conducted.

Health Hazmat used in-situ XRF to measure effectiveness of power washing activities in the street and on site walks. Additionally XRF was used to measure the concentration in right-of-way between the facility and Romaine St. Elevated concentrations of Cr, and Ni were observed. Enviroserve will remove six inches of soil from those areas. Health Hazmat conducted XRF analysis on soil located on the northeast side of the building and found no elevated metal levels.

The treatment system inside of the facility is still connected to the municipal/sanitary sewer system. A method to plug/cut off this system needs to be implemented in order to rule out any further release to that system.

A contractor (HarBro) arrived on site to begin boarding up entrances and windows in order to secure the property from the casual trespasser. LAFD Arson Investigator isn't able to make entry into the facility because of hazardous waste/and unstable structural conditions.

July 17, 2014; Thursday

The insurance adjustor for the building inspected the facility today. The Attorney for the PRPs was also on site and was provided a Notice of Federal Response Action (NFRA).

Enviroserve completed the following actions prior to leaving the site for the day:

- 1) They sealed/permanently obstructed the lateral line from the clarifier/treatment system to the municipal sanitary sewer
- 2) They cleaned out water valve/utility vaults located in the street where runoff from fire fighting activities took place.

OSC Duncan requested the PRP to provide 24-hour security until the waste that is currently stored in the street is removed.

OSC Wise meet with DTSC representative on site and discussed potential support that the State could provide.

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

The PRPs are Highland Plating and Max and Drusilla Faeth. On July 17, 2014 OSC Duncan issued a Notice of Federal Response to the attorney for Mr. and Mrs. Faeth. This is currently a PRP funded removal action. A civil investigator and EPA attorney have been assigned to support the EPA's oversight of the cleanup.

2.1.4 Progress Metrics

There are several identified waste streams at the site but there has been no disposal yet.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
acid liquid	water	30,100 gallons	TBD	TBD	TBD
flush water	water	2,300 gallons	TBD	TBD	TBD
Non-RCRA Soil	soil	140 cubic yards	TBD	TBD	TBD
Cyanide Liquid	plating solution	1,820 gallons	TBD	TBD	TBD

2.2 Planning Section

2.2.1 Anticipated Activities

The PRP will need to hire a structural engineer and arrange for the building to be shored. Once it is safe to enter the building the contents of the secondary containment should be transferred into temporary storage and then arranged to be disposed at an appropriated waste facility.

2.2.1.1 Planned Response Activities

The Hazardous waste that is currently staged in roll-off bins and Baker tanks will be scheduled for off-site disposal within the next 10- 14 days. Daily evaluations of the stability of the secondary containment will need to continue until the containment is emptied.

2.2.1.2 Next Steps

The PRP has been provided a NFRA which outlines the expectations or next steps that the EPA, Health Hazmat and LAWSP expect to be taken.

2.2.2 Issues

The pending bankruptcy of the building and property may present challenges to the PRP and regulators.

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

An SSID has been assigned to this project. At this time it is a PRP funded removal. The EPA START contractor has incurred some costs.

2.5 Other Command Staff

2.5.1 Safety Officer

The safety office for the fire operations was LAFD. The safety office for the cleanup operations will be provided by the contractor.

2.5.2 Liaison Officer

The Liaison Officer for the fire was LAFD.

2.5.3 Information Officer

The Public Information Officer for the fire was LAFD. OSC Wise has notified and briefed the EPA PIO for based in the Los Angeles Field Office. There have not been any press inquiries to either OSC as of this date.

3. Participating Entities

3.1 Unified Command

The Unified Command for fire consisted of LAFD, Health Hazmat and LAWSP. The current Unified Command consist of the PRP, EPA, Health Hazmat, Watershed Protection and DTSC

3.2 Cooperating Agencies

Agencies involved during the fire operations included: EPA, LAFD, LAFD Joint Hazard Assessment Team, Health Hazmat, LA WSP, LAIW, South Coast Air Quality Management District, DFW, the Los Angeles Regional Water Quality Control Board, Los Angeles Public Works, Los Angeles Department of Transportation, Los Angeles County Public Works and Los Angeles Police Department.

4. Personnel On Site

July 13, 2014: OSC Wise, 1 START
July 14, 2014: OSC Wise, 2 STARTs
July 15, 2014: OSC Duncan, 1 START
July 16, 2014: OSC Duncan, 1 START
July 17, 2014: OSCs Wise and Duncan, 1 START

5. Definition of Terms

ATSDR
CERCLA: Comprehensive Environmental Response, Compensation and Liability Act
CFR: Code of Federal Regulations
DFW: California Department of Fish and Wildlife
DMP: Data Management Plan
DQO: Data Quality Objectives
DTSC: California Department of Toxic Substance Control
EPA: U.S. Environmental Protection Agency
HCN: Hydrogen Cyanide
Health Hazmat: Los Angeles County Fire Department Health Hazardous Materials Division
IAP: Incident Action Plan
LAFD: City of Los Angeles Fire Department
LAIW: City of Los Angeles Industrial Waste
LAWSP: City of Los Angeles Watershed Protection
NFRA: Notice of Federal Response Action
OSC: On-Scene Coordinator
PRP: Potentially Responsible Party
QASP: Quality Assurance Sampling Plan
START: Superfund Technical Assessment and Response Team
XRF: X-Ray Fluorescence Spectrometer

6. Additional sources of information

6.1 Internet location of additional information/report

<http://www.epaosc.org/HighlandPlating>

6.2 Reporting Schedule

The next POLREP will be on July 25, 2014.

7. Situational Reference Materials

The website(<http://www.epaosc.org/HighlandPlating>) documents section has the IAP, NFRA and other documents.

POLREP #1 Last Updated 7/19/2014