

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #2
Insurance Take Over of Cleanup
Highland Plating Fire
A963
Los Angeles, CA
Latitude: 34.0891180 Longitude: -118.3419480

To: Francisco Castro, Los Angeles Sanitation

From: OSC Robert Wise and OSC Will Duncan

Date: 8/15/2014

Reporting Period: 07/18/2014 - August 15, 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 started as an emergency response plating shop fire and has evolved into a time-critical removal of a fire damaged and bankrupt plating shop. EPA is currently conducting oversight of cleanup operations in cooperation with local stakeholder agencies.

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 a 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.

See POLREP No. 1 for additional information.

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).

See POLREP No. 1 for additional information.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Air surveillance data collected by EPA during the July 13, 2014 did not detect any significant concentrations of hazardous substances in the smoke from the fire. Samples from the bulked fire suppression runoff documented the presence of chromium above hazardous waste levels. Samples from soil used as berming materials for fire suppression water are not RCRA hazardous waste.

See POLREP No. 1 for additional information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The emergency response has evolved into a time-critical removal action. EPA is conducting oversight of the cleanup efforts along with other stakeholder agencies.

2.1.2 Response Actions to Date

EPA has continued to work with the attorneys for the PRPs to move the cleanup forward. On August 12, 2014, OSC Wise and START met with contractors bidding for the removal of the chemicals inside the fire damaged structure. Later that day, OSC Wise was notified by Farmers Insurance that they would be taking over the responsibility of the fire cleanup operations including payment for all contractor services the night of the fire; addressing the fire damaged structure and disposal of all hazardous substances generated as a result of the fire.

Security for the site has been provided by the employees of Highland Plating. In addition, Highland Plating employees have been managing and collection contaminated fire suppression water inside the fire damaged portion of the structure to insure there are no off-site releases.

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 Action (NFRA) 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.

On July 17, 2014, a written NFRA was issued the PRPs. It was revised on July 24, 2014 to adjust the deadlines. None of the deadlines were met. On August 15, 2014, Farmers Insurance was sent a letter outlining the requirements for the cleanup and the milestone deadlines.

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>
Corrosive (D002) and chromium contaminated (D001) contaminated water	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 removal will be two parts. Part 1 will consist of the cleanup activities resulting from the July 13, 2014 fire. These activities will be conducted by Farmers Insurance. Part 2 will be the closure and cleanup of the remaining plating chemicals and contamination in the undamaged building. These activities will be completed by the PRP.

2.2.1.1 Planned Response Activities

The milestones timeliness provided to Farmers Insurance is listed below:

- August 18, 2014: provide the name of the contractor that will conduct the removal of hazardous substances currently stored on Orange Drive and Romaine Street.
- August 22, 2014: provide the name of the contractor that will conduct the building stabilization or demolition.
- August 22, 2014: provide the name of the contractor that will conduct the removal of the hazardous substances inside the fire damaged structure.
- August 29, 2014: Site-specific Health and Safety Plan (HASP) for all operations on the site.
- September 5, 2014: Removal Work Plan
- September 5, 2014: Building Stabilization Plan

- September 19, 2014: Subsurface Sampling Plan
- September 10, 2014: Commence building stabilization action
- August 29, 2014: Removal of the hazardous substances stored on the street completion
- September 15, 2014: Commence the removal of hazardous substance from the structure.

2.2.1.2 Next Steps

The removal of the chemicals from the street will be the next step. Farmers Insurance is currently determining the contractor.

Part 2 will be initiated in early September.

2.2.2 Issues

The pending bankruptcy of the building and property may present challenges to the PRP and regulators. The removal activities for the fire damaged portion of the facility will be funded by the insurance company directly. However, funding for Part 2 of the removal will require close coordination with the U.S. Bankruptcy Trustee.

2.3 Logistics Section

NA

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

NA

3. Participating Entities

3.1 Unified Command

EPA has requested formal referral of the site to conduct PRP oversight from LACoFD.

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

August 11, 2014: 1 OSC, 1 START, 1 EPA CI

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 in September 2014.

7. Situational Reference Materials

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