

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IX

**Subject:** POLREP #3  
Removal of Street Waste  
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:** 9/3/2014

**Reporting Period:** August 16, 2014 - September 4, 2014

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	A963	<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>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	N/A
<b>Mobilization Date:</b>	7/13/2014	<b>Start Date:</b>	7/13/2014
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	CAN000900173	<b>RCRIS ID:</b>	N/A
<b>ERNS No.:</b>	N/A	<b>State Notification:</b>	
<b>FPN#:</b>	N/A	<b>Reimbursable Account #:</b>	

#### 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

See POLREP No. 1 for additional information.

##### 1.1.2.1 Description of Threat

See POLREP Nos. 1 and 2 for additional information.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 13, 2014 through July 14, 2014, EPA conducted air surveillance during the fire suppression operations. The START collected real-time data for hydrogen cyanide and air samples for acid gases, heavy metals and hydrogen cyanide. No contaminants were detected above the Region 9 Superfund Site Screening Levels.

On July 14, 2014, Environmental Recovery Services (Enviroserv) conducted sampling of the roll off bins containing soil contaminated with contaminated fire suppression water runoff and the tanks containing contaminated fire suppression water runoff that were collected during fire suppression operations. The soil was not hazardous waste pursuant to the Resource Conservation and Recovery Act (RCRA). The liquid in the tanks were all RCRA hazardous waste for chromium.

Also on July 14, 2014, Enviroserv pumped vats containing copper and brass cyanide plating solutions into 250 gallon totes. The totes are currently being stored in the west plating building. The totes are F007 (cyanide plating solutions) RCRA Hazardous Waste.

On August 20, 2014, OSC Wise and the START conducted an inventory of the west building. There was a total of 201 containers excluding plating vats. Many of these containers were D001 Corrosive RCRA wastes. The inventory documented 18 250-275 gallon totes of marked RCRA hazardous waste. Many of these totes had accumulation starts dates in excess of 90 days in violation of generator accumulation time

requirements. A limited number of these containers are still useable product and are destined to be sent to a new plating shop being opened by the former facility manager at Highland.

## 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

See POLREP Nos. 1 and 2.

August 20, 2014: EPA and the START conducted an inventory of the chemical contents of the west building.

See POLREP Section 1.1.3 for more information.

August 25, 2014: Environmental Recovery Services (Enviroserv) conducted a removal of the waste generated during the fire that was stored in tanks and roll off bin on Orange Drive and Romaine Street. The waste was taken to a CERCLA Off-Site Rule approved facility for disposal. After the removal of the tanks and the roll off bins the street was cleaned and reopened. The sidewalk directly in front of the facility along Romaine Street remains closed.

August 29, 2014: A structural engineer retained by the PRPs conducted a structural safety assessment of the eastern building to determine how to stabilize the building. The engineer recommend the building be demolished as there was no way to safely stabilize the structure.

September 4, 2014: EPA (OSC Wise, CI Whiteneck, and START); LAWSP and Enviroserv met on-site to develop a strategy for the cleanup. Due to the issues associated with the inability to stabilize the building, EPA has requested an emergency "Yellow Tag" from Los Angeles Building and Safety (LABS) to allow for the pumping of the liquids in the secondary containment and vats that can be reached safely.

#### 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>Disposal</i>
Corrosive (D002) and chromium contaminated (D001) contaminated water	water	30,100 gallons	TBD	Siemens Technology, Vernon, CA
flush water	water	2,300 gallons	TBD	Siemens Technology, Vernon, CA
Non-RCRA Soil	soil	140 cubic yards	TBD	US Ecology, Beatty, NV
Cyanide Liquid	plating solution	1,820 gallons	TBD	Siemens Technology, Vernon, CA

## 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:

- September 5, 2014: Removal Work Plan - Changed to a date to be determined.
- September 5, 2014: Building Stabilization Plan - Cancelled
- 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

Enviroconserv will sample the secondary containment and vats in the fire damaged structure after LABS has downgraded the "Red Tag" to a "Yellow Tag". Once the samples have been analyzed and the waste profiled the secondary containment and vats will be pumped down to allow for the safe demolition of the fire damaged structure.

Part 2 will be initiated in late 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

A Unified Command made up of EPA, Health Hazmat and LAWSP is overseeing the cleanup.

### 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 be in September 2014.

## 7. Situational Reference Materials

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

