

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #4
PRP Removal Actions
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: 11/28/2014

Reporting Period: 09/06/2014 - 11/28/2014

1. Introduction

1.1 Background

Site Number:	A963	Contract Number:	
D.O. Number:		Action Memo Date:	10/15/2014
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

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

See POLREPS Nos. 1,2 and 3.

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

10/15/2014: OSC Wise notified the lawyers for the PRP that EPA would be assuming the lead for the cleanup. This decision was based on their inability to hire a qualified HAZWOPER compliant contractor.

10/22/2014: Lawyers for the PRP notified EPA that they had retained Enviroserv to conduct the removal of the liquids from Plating Lines #1 and #3.

10/24/2014: The lawyers for the PRP were notified by OSC Wise that they had until November 10, 2014 to provide EPA with the name of a contractor that would be able to complete the remainder of the removal

action.

11/03/2014 thru 11/06/2014: 1 OSC, 1 START

The PRP's contractor, Enviroserv, began hazardous waste bulking operations. Bulking operations this week will be conducted on Plating Lines #1 and #3. The START implemented an air surveillance program on the outside perimeter of the facility. The program included air monitoring for volatile organic compounds, cyanide and dust as well as air sampling for cyanide, metals and acid gases. Air surveillance documented no contaminants in excess of the action levels. A total of 38,436 gallons of Hazardous Waste were sent off-site for disposal. Waste was transported off-site in totes and vacuum trucks. See Section 2.1.4 for a description.

11/10/2014: The lawyers for the PRP failed to respond to the November 10, 2014 deadline directing them to provide the name of the contractor that would be conducting the removal.

11/12/2014: OSC notified the PRPs that EPA would again be assuming the lead for the removal.

11/24/2014: A contractor for the PRP contacted OSC Wise and indicated that his firm, DCE, Inc. would be conducting the removal action. DCE will be managing the removal while, Advanced Chemical Transport (ACT) will be conducting the actual work. DCE may not conduct any hot zone work, as they are not in compliance with HAZWOPER.

11/25/2014: OSC Wise and one START met DCE and ACT on-site for a job walk. During this job walk, OSC Wise reiterated that DCE is not allowed to conduct any of the hot zone operations including any demolition work. During this site walk, the DCE representative informed OSC Wise that they were not contracted to remove the chemicals in Plating Line #2. The removal action is expected to begin on December 8, 2014.

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

See POLREP #1.

2.1.4 Progress Metrics

Waste Stream	Quantity	Manifest #	Disposal
Corrosive (D002) and chromium contaminated (D001) contaminated water	30,100 gallons	TBD	Evoqua Water Technologies, LLC, Los Angeles, CA
flush water	2,300 gallons	TBD	Siemens Technology, Vernon, CA Evoqua Water Technologies, LLC, Los Angeles, CA
Non-RCRA Soil	140 cubic yards	TBD	US Ecology, Beatty, NV
Cyanide Liquid	1,820 gallons	TBD	Evoqua Water Technologies, LLC, Los Angeles, CA
NA3082. Hazardous Waste. Liquid, N.O.S. 9, PGIII (Chrome, Selenium)	2,755 gallons	013691044 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Sulfuric Acid, Chrome)	2,894 gallons	013691037 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Wastewater)	2,918 gallons	013691036 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3266. Waste Corrosive Liquid. Base, Inorganic, N.O.S. 8, PGII (Sodium Hydroxide)	2,083 gallons	013691035 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NA3082. Hazardous Waste. Liquid, N.O.S. 9, PGIII (Chrome, Selenium)	3,200 gallons	013691045 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Chrome)	3,000 gallons	013691038 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Sulfuric Acid)	1040 gallons	013691104 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NA3082. Hazardous Waste. Liquid, N.O.S. 9, PGIII (Chrome, Lead)	2220 gallons	013691056 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NA3082. Hazardous Waste. Liquid, N.O.S. 9, PGIII (Chrome)	600 gallons	013691055 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Chrome)	2,000 gallons	013691039 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA

UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Chrome)	3,700 gallons	013691087 JJK	US Ecology, Beatty, NV
UN3264. Waste Corrosive Liquid. Acidic, Inorganic, N.O.S. 8, PGII (Chrome)	1680 gallons	013691086 JJK	U.S. Ecology, Beatty, NV
NA3082. Hazardous Waste, Liquid, N.O.S. 9, PGIII (Selenium)	180 gallons	013691054 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NA3082. Hazardous Waste, Liquid, N.O.S. 9, PGIII (Chrome, Selenium)	785 gallons	013691054 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NON RCRA Hazardous Waste, Liquid. (Nickel)	255 gallons	013691054 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
NON RCRA Hazardous Waste, Liquid. (Wastewater)	1925 gallons	013691058 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGII (Chrome)	490 gallons	013691088 JJK	U.S. Ecology, Beatty, NV
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGII (Chrome)	625 gallons	013691088 JJK	U.S. Ecology, Beatty, NV
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGII (Nitric Acid)	730 gallons	013691057 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGI (Chrome)	590 gallons	013691057 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGII (Chrome)	1,000 gallons	013792019 JJK	Evoqua Water Technologies, LLC, Los Angeles, CA
UN3264. Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. 8 PGII (Chrome)	1,000 gallons	013792020	Evoqua Water Technologies, LLC, Los Angeles, CA

2.2 Planning Section

2.2.1 Anticipated Activities

The PRP has removed the liquids from Plating Lines#1 and #2 as well as a large amount of waste previously stored in the west building. Remaining removal activities will include the demolition of the building, the removal of waste from Plating Line #2 and the removal of any remaining waste in the west building.

2.2.1.1 Planned Response Activities

The PRP's contractor, ACT is anticipating having their health and safety plan to EPA by during the week of December 1, 2014. The removal is currently slated to begin on December 8, 2014.

2.2.2 Issues

The pending bankruptcy of the building and property may present challenges to the PRP and regulators. The attorneys for the PRP are currently in negotiations with Farmers Insurance to fund the removal action. Farmer's has provided an additional \$\$150,000 to the insured to get the cleanup started.

The prime contractor, DCE does not meet the minimum requirements for HAZWOPER compliance pursuant to 29 CFR 1910.120(b). Pursuant to 40 CFR 300.150, all removal actions conducted under the NCP must be in compliance with HAZWOPER. DCE will be acting as the general contractor with ACT conducting all of the work where exposure to hazardous waste may occur.

Due to inclement weather in Southern California during the week of December 1, 2014, areas previous pumped may now contain rain water which might have to be disposed of as hazardous waste.

The Orange Square property adjacent to the north of Highland is in negotiation with Farmer's concerning potential contamination as a result of the fire.

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, Los Angeles County 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

See Operations Section.

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
HAZWOPER: Hazardous Waste Operations and Emergency Response, 29 CFR 1910.120
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 December 2014.

7. Situational Reference Materials

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