U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
ALRECO Metals - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #4**
Progress
ALRECO Metals
C52N
Benton Harbor, MI
Latitude: 42.1389684 Longitude: -86.4362357

To:
From: Elizabeth Nightingale, OSC
Date: 12/8/2014
Reporting Period: 12/1/14-12/5/14

1. Introduction

1.1 Background

Site Number:	C52N	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/8/2014
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/10/2014	**Start Date:**	11/10/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	MIN000504648	**RCRIS ID:**	
ERNS No.:		**State Notification:**	Yes
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

See initial POLREP.

1.1.2.1 Location

See initial POLREP.

1.1.2.2 Description of Threat

See initial POLREP.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See initial POLREP.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Over the week beginning the December 1, 2014 work focused primarily on the following activities:

- Continuing to implement air monitoring and site security plans.

- Continuing to collect containers (non-empty drums, buckets and totes) and stage them in staging area. The majority of known containers have been relocated to the staging area at this time. Samples were collected from containers for hazcatting.

- Continuing to consolidate dross/smelting waste from across the site. This week, this work focused on removing dross/smelting waste another large pit and small pit in the center of the site and from a railroad spur along the east side of the site. Excavated waste is being consolidated in separate waste piles (Pile 4 and Pile 5). Smelting waste is also continuing to be removed from large onsite concrete storage bins (there are roughly 31 of these bins), and consolidated into Pile 4. The crew also continued street sweeping in the southern section of the site. The crew is attempting to conduct this decontamination work from the site perimeter towards the center, to the extent possible. Roughly 1/3 of the site foundations/pits/bins have been decontaminated to date - primarily on the northern and southern ends of the property.

- Continuing to sort non-conforming debris from large dross/smelting waste piles and shaping piles. Piles 1 and 2 have been sorted, shaped and covered pending disposal. Pile 3 contains a very large amount of non-conforming debris. Further work is still needed on Pile 3.

- Continuing to repackage bag house dust waste in compromised supersacks into shippable supersacks for disposal. Shippable supersacks are being staged in the staging area. To date, waste in 36 supersacks has been repackaged to date, and 5 were found to be in shippable condition already.

- Temperature Monitoring. The crew is monitoring the temperature of waste piles and supersacks of baghouse dust. Any materials with elevated temperatures are being segregated.

- Disposal. Bids for disposal and transportation of piles 1 and 2 of the aluminum production waste and baghouse dust were due on Friday 12/5/14. Several bids were received and are being evaluated.

Air Monitoring:
Every day that cleanup activity work will be ongoing, air monitoring will be conducted to ensure public and worker safety. Chemical hazards due to fugitive emissions from removal activities are anticipated to be low since the ERRS contractor will employ administrative and engineering controls to minimize fugitive emissions and particulates that migrate off-site.

Meteorological data will be obtained daily from the NWS website that provides current weather conditions and documented in the site logbook.

Particulate Air Monitoring:
Datarams (DR4) are deployed daily at four fixed locations in each direction along the site perimeter boundaries where off-site receptors are most at risk to exposure from fugitive emissions. Real-time PM-10 particulate data is transmitted back to the site command post where it is monitored continuously.

A website has been established to view the current and past perimeter air monitoring data for the site. To view the data go to the web address: viper.ert.org. You have to create a login on your first visit to the site. Once logged in, go to the R05 ALRECO Metals Deployment to view site data. Currently data from 2 of the 4 particulate meters are available online via VIPER.

The perimeter action level for PM-10 particulates has been set at a time weighted average (TWA) of 150 micrograms per cubic meter (µg/m3), as established in 40 CFR Part 50, National Ambient Air Quality Standards (NAAQS). Should a DR4 unit detect sustained particulate concentrations greater than 150 µg/m3, the source of emissions will be investigated, and administrative and/or engineering controls will be initiated to reduce the particulate emissions.

One personal data ram (PDR) particulate air monitor will be deployed in the work zone during the removal action. The particulate monitor will data-log instantaneous TWA particulate concentrations during active operations. Data logs will be downloaded and stored.

The particulate action level within the work zone has been established as 2.0 mg/m3 for the respirable fraction of total particulates. This is a Site specific action level based on a calculation of airborne dust concentration. The crew will implement appropriate engineering control measures if an exceedance of the established action level is sustained for more than 60 seconds. Action level exceedances will be managed by setting the monitor to alarm at the established action level to notify on-site personnel.

During the week of December 1, 2014, occasional exceedances of the perimeter action levels for particulates were detected, but the TWA was not exceeded. A number of brief exceedances occurred, as the crew was sweeping the foundations in the southern portion of the property. Alternative options are being considered to reduce particulate levels while still decontaminating foundations.

MultiGas Air Monitoring:
RAE Systems, Inc. AreaRAE multi-gas monitors are being deployed at the container staging area and at 3 perimeter locations (figure forthcoming soon). The AreaRAE multi-gas monitors will be used to monitor ammonia in parts per million (ppm), hydrogen sulfide (ppm), VOCs (ppm), and percent lower explosive limit (LEL). Real-time multigas data are transmitted back to the site command post where they are monitored continuously. These data are also available real time through the VIPER system described above.

The perimeter action levels are as follows: ·
Ammonia = 10 ppm
Hydrogen Sulfide = 10 ppm
PM10 particulates = 150 micrograms per cubic meter (µg/m3)
LEL = >5%
VOCs > 5 ppm

Work zone air monitoring results are being compared with the National Institute for Occupational Safety and

Health (NIOSH) 10-hour recommended exposure limit (REL) or the OSHA 8-hour time-weighted average (TWA) PEL, whichever is more restrictive.

A MultiRAE Plus 5-gas monitor (loaded with sensors for detection of oxygen, carbon monoxide, hydrogen sulfide, LEL, and VOCs) will also be used to periodically spot check AreaRAE data.

During the week of December 1, 2014, no exceedances of the perimeter or work zone multigas action levels were recorded.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
General notice letters were issued to current and former owners of the property. Investigation is ongoing.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities
Planned removal activities on-site include:
a) Developing and implementing a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a site Emergency Contingency Plan;

b) Developing and implementing a Site Work Plan that includes a Site Security Plan;

c) Securing, characterizing, and sampling known and suspected hazardous substances, including containers of liquid, baghouse dust, aluminum dross/ash waste piles, at the site;

d) Consolidating and packaging hazardous substances, pollutants and contaminants, including containers of liquid, baghouse dust, aluminum dross/ash waste piles for transportation and off-site disposal;

e) Decontaminating contaminated structures (primarily foundations) as necessary;

f) Transporting and disposing of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a Resource Conservation and Recovery Act/CERCLA-approved disposal facility in accordance with EPA's Off-site Rule (40 C.F.R. § 300.440), as applicable; and

g) Taking any other response actions to address any release or threatened release of a hazardous substance, pollutant and contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps
Next week, planned work will continue to consolidate dross from across the site; sort non-conforming debris from large dross piles and shape piles; and repackage baghouse dust into intact bags. Samples collected from containers of unknowns will be hazcatted. Strategy will be drafted to address extensive quantities of nonconforming material in pile 3. Bids for transportation and disposal of waste in piles 1 and 2 and baghouse dust will be evaluated,

2.2.2 Issues

2.3 Logistics Section
ERRS is managing site logistics.

2.4 Finance Section
No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer
OSC is serving in this role.

2.5.2 Liaison Officer
OSC is serving in this role.

2.5.3 Information Officer
OSC is serving in this role.

3. Participating Entities

3.1 Unified Command

n/a

3.2 Cooperating Agencies

MDEQ

4. Personnel On Site

12/1/14:
EPA: 1
START: 1
ERRS: 6
MDEQ: 1

12/2/14:
EPA: 2
START: 1
ERRS: 6

12/3/14:
EPA: 1
START: 1
ERRS: 6

12/4/14:
EPA: 1
START: 1
ERRS: 6

12/5/14:
EPA: 1
START: 1
ERRS: 6

5. Definition of Terms

ATSDR	Agency for Toxic Substances and Disease Registry
BZ	Breathing Zone
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
DNR	Department of Natural Resources
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ERRS	Emergency and Rapid Response Service
LEL	Lower Explosive Limit
MDEQ	Michigan Department of Environmental Quality
mg/m3	miligrams per cubic meter
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
NRC	National Response Center
OSC	On Scene Coordinator
PPE	Personal Protective Equipment
PPM	Parts per million
RCRIS	Resource Conservation and Recovery Act Information System
RP	Responsible Party
RRT	Regional Response Team
START	Superfund Technical Assessment and Response Team
ug/m3	micrograms per cubic meter
US FWS	United States Fish and Wildlife Service
USCG	United States Coast Guard
VOC	Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.net/alreco

and

viper.ert.org. Once logged in, go to the R05 ALRECO deployment to view site data.

6.2 Reporting Schedule

POLREPs will be issued weekly over the course of the removal action.

7. Situational Reference Materials

No information available at this time.