

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Progress
ALRECO Metals
C52N
Benton Harbor, MI
Latitude: 42.1389684 Longitude: -86.4362357

To:

From: Paul Ruesch, OSC and Elizabeth Nightingale, OSC

Date: 12/15/2014

Reporting Period: 12/8/14 - 12/12/14

1. Introduction

1.1 Background

Site Number:	C52N	Contract Number:	EP-S5-09-05
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

From December 8 - 12, 2014, work focused on the following activities:

Operations

- Completed sampling and field hazcatting of all staged containers with unknown contents (non-empty drums, buckets & totes);

- Continued consolidation of dross/smelting waste from across the site, and decontamination of foundations/pits/bins. Work focused on removing dross/smelting waste from pits and along railroad spurs on the east & west sides of the site. Sweeping was focused in the southern section of the site. Excavated waste was consolidated into waste piles #4 and #5. Foundation decontamination is estimated to be 90% complete.

- Continued sorting non-conforming debris from large dross/smelting waste piles and shaping piles. Piles 1, 2 & 4 are ready to ship for disposal. Piles 3 and 5 contain non-conforming debris which needs to be further

sorted prior to sampling & characterization for disposal;

- Continued repackaging of baghouse dust waste in compromised supersacks into shippable supersacks, and staged sacks for disposal. To date, 43 bags have been repackaged, 13 were already in shippable condition and did not need to be repackaged; and another 10 sacks still need to be repackaged;

- Continued temperature monitoring of waste piles & supersacks of baghouse dust;

- Evaluated bids & selected contractors for transportation & disposal of dross/smelting waste piles 1 & 2; and

- Met with representatives from the proposed disposal facility on site on December 12 to evaluate the dross/smelting waste material for acceptability in the landfill. In addition, transport, documentation and loading/unloading procedures were discussed to ensure safe & proper handling of the material.

Air Monitoring

- Continued implementation of the air monitoring plan to ensure public and worker safety.

- Continuously monitored data from particulate and chemical monitors for compliance with established standards. Real-time data are transmitted back to the site command post where they are monitored continuously. Any exceedances are addressed immediately.

- Maintained a website (VIPER) with current and past perimeter air monitoring data. See Section 6.1 for instructions on accessing the website.

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. The perimeter action level for PM-10 particulates has been set at a time weighted average (TWA) of 150 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), as established in 40 CFR Part 50, National Ambient Air Quality Standards (NAAQS).

One personal data ram (PDR) particulate air monitor is deployed daily in the work zone during the removal action. The particulate monitor will data-log instantaneous TWA particulate concentrations during active operations. Action level exceedances will be managed by setting the monitor to alarm at the established action level to notify on-site personnel. The particulate action level within the work zone has been established as 2.0 mg/m^3 for the respirable fraction of total particulates. This is a site specific action level based on a calculation of airborne dust concentration.

During the week of December 8, 2014, occasional exceedances of the perimeter action levels for particulates were detected, but the TWA was not exceeded.

MultiGas Air Monitoring:

AreaRAE multi-gas monitors are being deployed at the container staging area and at 3 perimeter locations. 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).

The perimeter action levels are as follows:

Ammonia = 10 ppm

Hydrogen Sulfide = 10 ppm

PM10 particulates = 150 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)

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 8, 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

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Scrap metal	steel	40 yds (est)	NA	recycling	Padnos Recycling, Benton Harbor, MI
RCRA empty containers & debris	solid	30 yds (est)	A5-156-01	disposal	Forest Lawn Landfill, Three Oaks, MI

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Please see initial POLREP for planned removal activities on-site.

2.2.1.2 Next Steps

Next week, work will continue to consolidate dross from across the site; prepare to ship dross/smeltering waste for disposal; commence shipment waste piles 1 & 2 for disposal; 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 shipped for analysis in preparation for disposal.

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

NA

3.2 Cooperating Agencies

MDEQ

4. Personnel On Site

12/8/14:

EPA - 1

START - 1

ERRS - 6

12/9/14:

EPA - 1

START - 1

ERRS - 6

MDEQ- 1

12/10/14

EPA - 1

START - 1

ERRS - 6

12/11/14

EPA - 2

START - 1

ERRS - 6

12/12/14

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	milligrams 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

<http://www.epaosc.net/alreco>

Air monitoring data is posted real time at <http://vipert.ert.org>. Users need to create a login upon their first visit to the website. Once logged in, select *R05 ALRECO Metals 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.