

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IX

**Subject:** POLREP #5  
Discharge of Contaminated Water to Street  
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:** 12/9/2014

**Reporting Period:** 11/29/2014-12/9/2014

## 1. Introduction

### 1.1 Background

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

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

12/03/2014: ACT submitted the health and safety plan for the site. The plan submitted stated that DCE would be conducting hot zone demolition activities. OSC Wise reminded ACT and DCE that as DCE was not HAZWOPER compliant, they (DCE) could not conduct hot zone work.

12/08/2014: OSC Wise and START C. Myers arrived on-site at approximately 1030 hours for the first day of the removal action. Neither DCE or ACT was on-site. While looking for contractor personnel, OSC Wise and START discovered a discharge for potentially contaminated rain water from a bermed area in the

breezeway from a piece of hose into the street. The discharge was set up as a siphon over the berm. The water had a yellow/green tint to it. OSC Wise and START collected samples of the water from the hose, the bermed area, the entry point into the gutter, the entry point into the storm drain and one upstream sample for background. One sample of heavily contaminated sand that was migrating out the breezeway and onto the sidewalk was also collected. OSC Wise dismantled the siphon and notified the facility manager at Highland of this issue. As the discharge was impacting the street and storm drain system of the City of Los Angeles, OSC Wise notified Howard Wong of LAWSP of the discharge. LAWSP responded to the scene and took over the investigation into the discharge. EPA transferred all of its samples to LAWSP under chain of custody. At LAWSP request, OSC Wise notified Highland's contractor, DCE of the discharge and requested their contact their client to get permission to respond to the discharge. At approximately 1530 hours ACT arrived on-site. LAWSP oversaw the cleanup and at 1600 hours EPA demobilized from the site.

12/09/2014: OSC Wise and START C. Meyers were on-site for a job walk with DCE for the start of the removal tomorrow. OSC Wise examined the breezeway, all the water behind the berm was pumped, the contaminated sand was removed and an additional berm at the doorway was installed. The contaminated rainwater was pumped into totes and drums and stored on-site.

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

See POLREP #1.

LAWSP issued a misdemeanor ticket to Martin Zamora of Highland Plating for the 12/08/2014 discharge from the facility.

### 2.1.4 Progress Metrics

<b>Waste Stream</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Disposal</b>
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 revised health and safety plan to EPA by of December 9, 2014. The removal is currently slated to begin on December 10, 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. The original cleanup mobilization date was delayed because the original health and safety plan provided by ACT indicted DCE would be conducting hotzone demolition activities.

Due to inclement weather in Southern California during the week of December 1, 2014, areas previous pumped now contain rain water which might have to be disposed of as hazardous waste. Due to rain predicted starting on December 11, 2014, OSC Wise has directed DCE to insure zero discharge from the facility.

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**

ACT: Advanced Chemical Transport, Inc.  
CERCLA: Comprehensive Environmental Response, Compensation and Liability Act  
CFR: Code of Federal Regulations  
DCE: Demolition, Construction and Environmental Services, Inc.  
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 December 15, 2014.

## **7. Situational Reference Materials**

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