

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Commonwealth Site - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Final
Commonwealth Site

Detroit, MI
Latitude: 42.3606980 Longitude: -83.0852929

To:
From: Brian Kelly, OSC
Date: 12/11/2014
Reporting Period:

1. Introduction

1.1 Background

Site Number: C52R	Contract Number:
D.O. Number:	Action Memo Date: 8/28/2014
Response Authority: CERCLA	Response Type: Time-Critical
Response Lead: EPA	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date: 10/20/2014	Start Date: 10/20/2014
Demob Date:	Completion Date: 12/15/2014
CERCLIS ID:	RCRIS ID:
ERNS No.:	State Notification: Yes
FPN#:	Reimbursable Account #:

Incident Category

Fund lead CERCLA time-critical removal action.

Site Description and Location

The Commonwealth Site (site) is located at 5923 Commonwealth Street, Detroit, Michigan 48208. The site is the former location of E.L.M. Industries, Inc. and Triune Iron & Metal, Inc. It is unknown when the businesses ceased operations, but the property was tax foreclosed by the city of Detroit on January 19, 2010. During an assessment of the property, several hundred drums, totes, cylinders, and small containers of waste were found.

Description of Threat and Preliminary Removal Assessment

On May 15, 2014, EPA conducted a site assessment that documented drums, totes and small containers at the site. Some of the drums show signs of deterioration, damage and possible leaking. Drum labels include trichloroethylene, acetylene gas, hydraulic and motor oil, coating enamels, propylene glycol n-propyl ether, and hydrogen peroxide. EPA also collected samples (CW-AR-01-051514 and CW-AR-02-051514) that when tested had a flash point less than 140 degrees Fahrenheit (°F). These wastes are considered hazardous for the characteristic of ignitability, pursuant to 40 C.F.R. § 261.21. Tetrachloroethene was detected in sample CW-DR-01-051514 at a concentration of 1.1 milligrams per liter [mg/L]). This result exceeds the toxicity criterion for tetrachloroethene of 0.7 mg/L. Therefore, the waste associated with this sample is considered hazardous according to 40 C.F.R. § 261.24.

2. Current Activities

2.1 Operations Section

Narrative

See prior POLREPs for actions completed in previous reporting periods.

Response Actions to Date

Between November 1 and December 15, 2014, EPA completed hazard categorization (HAZCAT) of waste streams, bulked and prepared composite samples for laboratory analysis, and cut and crushed all drums and totes to confirm RCRA empty status. Free-standing liquids throughout the site were solidified and collected for disposal. EPA solicited, awarded, and completed the transportation and disposal of hazardous substances at an off-site RCRA disposal facility.

During removal work, START conducted perimeter and exclusion zone air monitoring for volatile organic compounds (VOCs), carbon monoxide (CO), hydrogen sulfide (H₂S), lower explosive limit (LEL%) and oxygen (O₂%) utilizing an AreaRAE network and a multiRAE. There have been no exceedances of action levels.

Security was on site during nonworking hours and during temporary shut down prior to final transport and disposal activities.

Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The bankrupt E.L.M. Industries, Inc. and Triune Iron & Metal, Inc. are the only known PRPs.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Disposal
Friable Asbestos	solid	1-20yd3 rolloff	MIK 396399685	Carelton Farms Landfill 28800 Clark Road New Boston, MI 48164
UN3077 Environmentally Hazardous Substances (Xylene, Toluene)	solid	365 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
UN3802 Environmentally Hazardous Substances (Xylene, Naphthalene)	liquid	1465 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
UN1993 Waste Flammable (Xylene, Toluene)	liquid	2325 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
UN3077 Environmentally Hazardous Substances (Acetone, 2- Butanone)	solid	95 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
UN3200 Waste Corrosive (Hydrochloric Line Descaler)	solid	55 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
Non DOT/Non Regulated	solid	55 G	012480824 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214
Non DOT/Non Regulated	solid	30 Y	012480841 JJK	Petro-Chem Processing Group 421 Lyncaste Detroit, MI 48214

Regional Metrics

This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	0
	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	0
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
	Number of contaminated residential yards cleaned up	0
Stand Alone Assessment	Number of workers on site	9

Contaminant(s) of Concern

Oil Response Tracking

Estimated volume	Initial amount released	N/A
	Final amount collected	N/A
	FPN Ceiling Amount	N/A
CANAPS Info	FPN Number	N/A
	Body of Water affected	N/A

Administrative and Logistical Factors (Place X where applicable)

Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
Criminal Investigation Division involved	Extreme weather or abnormal field season	X Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year	Active fire present
X Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	42	gallons
Unleaded Fuel Used	unknown	gallons
Alternative/E-85 Fuel Used	85	gallons

Electricity from Coal	unknown	kW
Electricity from solar/wind	unknown	kW
Electricity from grid/mix	0	kW
Solid waste used	0	
Solid waste recycled	10	lbs

Version 140908

2.2 Planning Section

Next Steps

None. Removal Action completed.

2.3 Logistics Section

OSC Brian Kelly and ERRS removal manager (RM) organized logistics for the site.

Resources that were present on site during this reporting period included:

- Air horns
- Air monitoring equipment
- ERRS equipment storage trailer
- ERRS 'break' trailer (conex box)
- ERRS work crew
- ERRS work vehicles
- ERRS removal manager
- ERRS chemist
- ERRS field cost assistant
- Federal On Scene Coordinator
- Fire extinguishers
- Office trailers (conex box)
- Portable decontamination area (first aid kit, emergency shower & eyewash)
- Portable restrooms
- Portable generators
- Roll-off dumpster (20yd3 & 30yd3)
- Sawzall
- Security subcontractor personnel
- Semi-truck with trailer (T&D phase)
- Skid steer with attachments
- START contractor (oversight & air monitoring)
- Telescoping industrial forklift
- Truck with rear roll-off dumpster trailer system
- Wind sock

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The site-specific HASP was reviewed and signed by all site personnel. Safety meetings were held each morning with all site workers.

2.5.2 Liaison Officer

Brian Kelly serves as liaison with local officials and interested parties.

2.5.3 Information Officer

See Section 2.5.2

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Detroit Buildings, Safety Engineering & Environmental Department (BSEED)
Michigan Department of Environmental Quality (MDEQ)

4. Personnel On Site

U.S. EPA - 1
START contractor (Tetra Tech) - 1
ERRS contractor (Lata Kemron/Marine Pollution Control) - 7
Security guard (off-shift) - 1

TOTAL PERSONNEL = 10

5. Definition of Terms

City of Detroit BSEED - The Buildings, Safety Engineering & Environmental Department

CO - Carbon Monoxide

ERRS - Emergency and Rapid Response Services

HASP - Health and Safety Plan

HAZCAT - Hazard Categorization

H2S - Hydrogen Sulfide

LEL - Lower Explosive Limit

MDEQ - Michigan Department of Environmental Quality

OSC - On Scene Coordinator (Federal)

O2 - Oxygen

PPE - Personal Protection Equipment

RM - Removal Manager - ERRS

START - Superfund Technical Assessment and Response Team

U.S. EPA - United States Environmental Protection Agency

VOCs - Volatile Organic Compounds

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.