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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #7**
Progress
ALRECO Metals
C52N
Benton Harbor, MI
Latitude: 42.1389684 Longitude: -86.4362357

To:
From: Elizabeth Nightingale, OSC and Jacob Hassan, OSC
Date: 1/9/2015
Reporting Period: 12/23/14-1/9/15

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
On December 23, 2014 and the continuing January 5-9, 2015, work focused on the following activities:

Operations
- Repackaging and consolidating waste from select staged containers (non-empty drums, buckets & totes) for disposal;

- Continued transportation & disposal of dross/smelting waste from waste pile 1 and waste pile 4 to the disposal facility. Waste shipped off site is cataloged in the progress metrics table below. To date, 48 loads of this waste weighing approximately 1,239 tons have been shipped for disposal.

- Continued sorting non-conforming debris from large dross/smelting waste piles and shaping piles. Work focused on sorting non conforming debris from Piles 3 and 5;

- Began staging containers of baghouse dust waste for disposal; and

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

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 (µg/m3), 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/m3 for the respirable fraction of total particulates. This is a site specific action level based on a calculation of airborne dust concentration.

During the reporting period, a few brief exceedances of the perimeter action level 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 (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. Personal ammonia and hydrogen sulfide taht alarm when action levels are exceeded also being utilized in the work zone.

During the reporting period, a few very brief exceedances of the perimeter multigas action levels were recorded - possibly due to hitting small pockets of gas in the dross waste. No exceedances of work zone action levels were detected.

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 (Tons)	Quantity Estimated Or Final?	Manifest #	Disposal
RCRA empty containers & debris	Solid	5	estimated	A5-156-01	Republic Forest Lawn
Aluminum Production Waste (Piles)	Solid	32.46	final	2954167	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	33.16	final	2954168	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	29.74	final	2954169	WM-Oak Ridge RDF (AL monofill)
Aluminum	Solid	29.88	final	2954170	WM-Oak

Production Waste (Piles)					Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	30.11	final	2954171	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.31	final	2954172	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.89	final	2954173	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.38	final	2954174	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.89	final	2954175	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.33	final	2954176	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.60	final	2954177	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.52	final	2954178	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.05	final	2954179	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.84	final	2954180	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.70	final	2954181	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.72	final	2954182	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	final	2954183	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	19.98	final	2954184	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.84	final	2954185	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.79	final	2954186	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.80	final	2954187	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.48	final	2954188	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.44	final	2954189	WM-Oak Ridge RDF (AL monofill)
Aluminum Production	Solid	26.45	final	2954190	WM-Oak Ridge

Waste (Piles)					RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.50	final	2954191	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	21.83	final	2954192	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.96	final	2954193	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.48	final	2954194	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.53	final	2954195	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.24	final	2954196	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.21	final	2954197	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.47	final	2954198	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.13	final	2954199	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	29.60	final	2954200	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.59	final	2954201	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.62	final	2954202	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.30	final	2954203	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.20	final	2954204	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	29.77	final	2954205	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.35	final	2954206	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.59	final	2954207	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.45	final	2954208	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	22.90	final	2954209	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste	Solid	28.41	final	2954210	WM-Oak Ridge RDF (AL

(Piles)					monofill)
Aluminum Production Waste (Piles)	Solid	25.00	est	2954211	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	est	2954212	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	est	2954213	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	est	2954214	WM-Oak Ridge RDF (AL monofill)
Unprepared steel	Solid	0.01	final		Padnos

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

Work will continue to ship waste from piles 1 and 2 for disposal; sort non-conforming debris from piles 3 and 5 and shape piles; begin shipment of baghouse dust waste for disposal; and continue foundation decontamination work.

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

12/23/14:
EPA - 1
START - 1
ERRS - 6

1/5/15
EPA - 1
START - 1
ERRS - 8

1/6/15
EPA - 1
START - 1
ERRS - 8

1/7/15
EPA - 1

START - 1
ERRS - 8

1/8/15
EPA - 1
START - 1
ERRS - 8

1/9/15
EPA - 1
START - 1
ERRS - 8

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
http://www.epaosc.net/alreco

Air monitoring data is posted real time at http://viper.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. The next report will be issued January 9th, 2015.

7. Situational Reference Materials

No information available at this time.