

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #8
Progress
ALRECO Metals
C52N
Benton Harbor, MI
Latitude: 42.1389684 Longitude: -86.4362357

To:

From: Elizabeth Nightingale, OSC and David Andrews, OSC

Date: 1/20/2015

Reporting Period: 1/12/15-1/16/15

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

During January 12-16, 2015, work focused on the following activities:

Operations

- Completed transportation & disposal of dross/smelting waste from waste pile 1 to the disposal facility. Initiated transportation and disposal of waste piles 2 and 4. To date, 99 loads of this waste weighing approximately 2,542 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 Pile 3.
- Initiated shipping of baghouse dust waste for disposal. To date, 5 loads of this waste weighing approximately 46.33 tons have been shipped for disposal.

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

- Waste shipped off site is cataloged in the waste metrics table below.

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, no exceedances of the perimeter action level for particulates were detected.

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 that alarm when action levels are exceeded also being utilized in the work zone.

During the reporting period, no exceedances of the perimeter multigas action levels were recorded and substantiated. 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 Production Waste (Piles)	Solid	29.88	final	2954170	WM-Oak 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)

Waste (Piles)						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	24.6	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	24.7	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	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	23.8	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 Waste (Piles)	Solid	26.45	final	2954190		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.5	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	29.6	final	2954200		WM-Oak

Waste (Piles)						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	27.3	final	2954203		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.2	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	22.9	final	2954209		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.41	final	2954210		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	33.83	final	2954211		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.72	final	2954212		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	22.78	final	2954213		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.51	final	2954214		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.11	final	2954215		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.80	final	2954216		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.61	final	2954217		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.76	final	2954218		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.46	final	2954219		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.84	final	2954220		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.14	final	2954221		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Baghouse Dust)	Solid	8.03	final	2954118		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.63	final	2954222		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.36	final	2954223		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.18	final	2954224		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.93	final	2954225		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.05	final	2954226		WM-Oak

Waste (Piles)						Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	29.56	final	2954227		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Baghouse Dust)	Solid	7.56	final	2954119		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.90	final	2954228		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.84	final	2954229		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.38	final	2954230		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.15	final	2954231		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	22.82	final	2954232		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.93	final	2954233		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.95	final	2954234		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.14	final	2954235		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	22.76	final	2954236		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.80	final	2954237		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.75	final	2954238		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.91	final	2954239		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.27	final	2954240		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Baghouse Dust)	Solid	7.86	final	2954121		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.24	final	2954241		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.41	final	2954242		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.84	final	2954243		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	30.34	final	2954244		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.51	final	2954245		WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.83	final	2954246		WM-Oak Ridge RDF (AL monofill)

Aluminum Production Waste (Baghouse Dust)	Solid	8.79	final	2954122	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.05	final	2954247	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.56	final	2954248	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.86	final	2954249	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.78	final	2954250	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.08	final	2954251	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	23.29	final	2954252	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.12	final	2954253	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.53	final	2954254	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	26.25	final	2954255	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.61	final	2954256	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.50	final	2954257	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	32.07	final	2954258	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Baghouse Dust)	Solid	14.09	final	2954123	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	22.88	final	2954260	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	27.08	final	2954261	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	24.13	final	2954262	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	28.95	final	2954263	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	18.34	final	2954264	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954265	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 2 and 4 for disposal; sort non-conforming debris from pile 3 and shape pile; continue shipment of baghouse dust waste for disposal; continue consolidation of containerized 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

1/12/15
EPA - 1
START - 1
ERRS - 8

1/13/15
EPA - 1
START - 1
ERRS - 8

1/14/15
EPA - 1
START - 1
ERRS - 8

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

1/16/15
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	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.epaossc.net/alreco>

Air monitoring data is posted real time at <http://vipер.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.