

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #6
Removal Progress and Work Stoppage
Highland Plating Fire
A963
Los Angeles, CA
Latitude: 34.0891180 Longitude: -118.3419480

To: Francisco Castro, Los Angeles Sanitation

From: OSC Robert Wise

Date: 1/13/2015

Reporting Period: 12/10/14 -01/12/15

1. Introduction

1.1 Background

Site Number:	A963	Contract Number:	
D.O. Number:		Action Memo Date:	10/15/2014
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	N/A
Mobilization Date:	7/13/2014	Start Date:	7/13/2014
Demob Date:		Completion Date:	
CERCLIS ID:	CAN000900173	RCRIS ID:	N/A
ERNS No.:	N/A	State Notification:	
FPN#:	N/A	Reimbursable Account #:	

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

12/12/2014

Summary: Heavy rain-event. No removal operations in lieu of storm water control.

On-site Personnel: START, DCE, ACT

Heavy Rain begins at 02:00 on 12/12/2014 and continues throughout the night until approximately 12:00 on 12/12/2014. Rain continues throughout the night and with a documented rate as much as 1in/hr. DCE and

ACT personnel on-site throughout the night pumping storm water that had been collecting throughout the facility in to totes and other empty, on-site, containers. Areas that flooded include: breezeway, polishing room, main chemical/machinery storage room (unburnt section of facility), plating rooms (area of facility involved in the fire), wastewater treatment room, and secondary containment located in extreme west end of facility. Observations by START and conversations with on-site personnel indicate that no off-site release occurred during the rain event. 5000 gallon baker tank delivered to site after the rain event and is filled with storm water that had been collected and containerized in totes.

12/16/2014

Summary: First day of demolition. Operations include demolition of corrugated plastic/steel roof above breezeway area, removal of plumbing/infrastructure running from the roof area of the plating-lines to the part of the structure (west building) not involved in the fire, and demolition of the extreme west wall of the east building (wall separating breezeway from south plating line).

On-Site Personnel: START, DCE, ACT, AIS, FACS (Forensic Analytical Consulting Services (Air Monitoring subcontractor), OSC Wise

Light rain is encountered on-site throughout the day on 12/16/2014. Demolition operations begin at 06:00 and include the use of an excavator to pull down the corrugated plastic and steel roof and associated infrastructure that is located above the breezeway between the east and west buildings of the facility. Additionally, the western-most wall of the east building (plating building) between the breezeway and the eastern most end of the south plating line is removed. Metal scrap is collected in a 40cy roll-off bin. Non-metal demolition debris is stockpiled in the breezeway area and is utilized as a pad for the excavator to sit upon in order to gain an additional height/reach advantage during demolition operations. Air Monitoring is performed throughout the day for HCN, CO, VOC, LEL and OXY, however, due to the consistent light-rainfall, total particulate in air (via pDR) is not conducted.

12/17/2014

Summary: Demolition of structure continues. Pumping of liquid plating waste from Plating Line #2 occurs. 40cy of scrap metal off-site.

On-Site Personnel: START, DCE, ACT, AIS, FACS, PRP-Attorney

Demolition operations conducted on 12/16 effectively cleared a small section of the roof material/fire-debris from the extreme west end of the center plating line (Plating line #2). Two plating vats, still containing plating wastes, are uncovered and liquid waste contained therein are pumped and containerized in to totes, and staged in the former polishing room. Sampling and analysis of the containerized waste will occur once all of the vats located in Plating Line #2 are collected in to bulk containers. No detections above the action level for HCN, VOC, or particulate are observed at the two perimeter monitoring locations (N and S) or on-site in the work-zone. The action level for airborne particulate is defined at 1.0 mg/m³. The 40cy roll-off bin and was picked up and transported off site by Unicorn Metals & Recycling, Co. Demolition continues after the pumping activities are completed, and the vats (which contain a small amount of solids/tank-bottoms) are added to the RCRA debris waste pile, as they cannot be scrapped in the current condition without being thoroughly cleaned.

12/18/2014

Summary: 18cy of RCRA Debris off-site. Continue demolition of structure and pumping of plating waste from Plating Line #2.

On-site Personnel: START, DCE, ACT, AIS, FACS, PRP-Attorney and group of "land developers" and/or buyers.

Demolition activities conducted during the latter part of the day on 12/17/2014 have further uncovered vats located in Plating Line #2. Initial operations conducted on this day include pumping of liquid plating waste from the newly uncovered vats in to bulk containers. Later in the day, after the pumping activities are completed, a load of RCRA debris is generated, manifested*, and leaves the site for the US Ecology Hazardous Waste Facility located in Beatty, NV. No detections above the action level for HCN, VOC, or particulate are observed at the two perimeter monitoring locations or on-site in the work-zone.

12/19/2014

Summary: Totes of storm-water pumped in to 5k gal bulk container. Continue demolition and waste-pumping activities.

On-Site Personnel: START, DCE, ACT, AIS, FACS

Rainwater collected in to totes and other bulk containers (staged in former polishing room) from the 12/12/2014 rain event is pumped in to a 5k gallon bulk container (baker tank) that was delivered to the site. Totes that contained the rain water are now freed up for use during the pumping activities associated with liquids in Plating Line #2. Once the 5k bulk container is completely filled, pumping operations in Plating Line #2 continue, as more of the roof/structure resting on top of the plating line had been removed during the storm water pumping activities conducted earlier in the day. An ACT Operations/Sales-Representative arrives on-site to perform a walkthrough of the west building, as part of a "Removal Phase 2" reconnaissance which would address small containers and all other waste left on-site, but not involved in the fire. No detections above the action level for HCN, VOC, or particulate are observed at the two perimeter monitoring locations or on-site in the work-zone.

12/20/2014

Summary: Continue demolition and waste-pumping activities. 40cy of Scrap Metal off-site in once roll-off bin, new roll-off for scrap is delivered.

On-Site Personnel: START, ACT, AIS, FACS

Pumping of liquid waste material from vats in Plating Line #2 is performed first-thing in the morning. Structural demolition operations continue upon the completion of pumping activities. The South wall of the facility, beginning at the breezeway and extending approximately 36 linear feet (two "sections" of the exterior wall) to the East towards N. Orange Dr., is demolished. All bricks removed from the exterior wall are incorporated to the RCRA-Debris waste stream. Material from the small secondary containment cell located in the Southwest corner of the North Building is pumped in to a 55-gal drum, in order to minimize the possibility of release to the breezeway, and subsequently the sidewalk, street, and storm drain. The second (total) load of scrap metal is picked up and transported off-site. No detections above the action level for HCN, VOC, or particulate are observed at the two perimeter monitoring locations (N and S) or on-site in the work-zone.

12/22/2014

Summary: Two (40cy each) truckloads of RCRA-Debris off-site. HCN release to air, "stop work" order and PPE upgrade determined to be necessary. Inventory of totes staged in former polishing room performed.

On-Site Personnel: START, ACT, AIS, FACS, OSC Wise

Two truckloads of RCRA-Debris are manifested and transported off-site first thing in the morning: 40cy each. Rainwater now containerized in the 5k gal "baker" tank staged to the immediate west of the breezeway is sampled for disposal profile. Inventory of totes that have been filled with material from the Plating Line #2 Vats in conducted, a total of approximately 4,660 gallons of plating-waste and plating-waste related liquids have been removed from Plating Line #2 and containerized/staged. At 10:25 FACS issues a "stop work" order because of a HCN detection of 4ppm was observed (and confirmed with a second MultiRAE unit) at the North perimeter-monitoring location. Due to the confirmed measurement of HCN in air, an upgrade to Level B PPE is determined to be necessary for all personnel performing work (the only time personnel are down-range is during vat-pumping activities) in the exclusion zone moving forward. AIS did not have enough SCBA air-canisters on-site to continue work for the remainder of the day at full-strength, so the crew demobilizes and a Cascade air-system is delivered to the site.

12/23/2014

Summary: Two (40cy each) truckloads of RCRA-Debris off-site. 8 compressed-gas cylinders collected, secured, and staged. 4 small containers (17-gal total, liquid) of cyanide over-packed and staged with other cyanide containers. Vat failure(containing pH 0 material) to secondary containment and subsequent HCN generation/detection.

On-Site Personnel: START, DCE, ACT, AIS, FACS

Two truckloads of RCRA-Debris are manifested and transported off-site first thing in the morning: 40cy each. Demolition activities uncover/daylight the next vats in the West-to-East sequence of Plating Line #2. Pumping operations continue in Plating Line #2 once demolition of structure located overhead clears enough space to make ops safe. Eight compressed-gas cylinders involved in the fire are collected from the east end of the plating facility: six from under the stairs by the east end of the north plating line, and two from the east end of the south line. Four additional small containers (5gal) of cyanide (all liquid: 17gallons total volume) are discovered under the stairs at the east end of Plating Line #2 (same location as cyanide drums collected during Enviroserv removal). Cyanide containers are over-packed in to two, 55-gal poly drums (10 gallons, 7 gallons) and staged with cyanide containers removed during previous removal operation (west building, storage room). During demolition activities, the next vat in sequence containing liquid plating waste was bumped by falling debris and due to its corroded/unstable condition, released the contents (unknown volume, pH 0) to the secondary containment of Plating Line #2. The excavator operator stopped activities, and exited the exclusion zone as soon as the release was observed (multiRAE in cab of excavator did not detect HCN concentrations above 0.0ppm). An entry was made by AIS personnel on supplied air to survey the contents of the vat, and conditions of release. As the AIS personnel were approaching the vat, multiRAE measurements (personnel were carrying multiRAE) of 8.0ppm were recorded and a "bubbling" reaction was observed in the secondary containment. Reaction is allowed to continue and perimeter and exclusion zone air monitoring is performed. Perimeter readings recorded a spike of 2.0ppm HCN at the north location and 1.0ppm HCN at the south location; however, concentrations of HCN in air were not sustained and only observed as "spikes." Demolition and/or pumping activities are cancelled for the remainder of the day (had already been scheduled as a "short" day due to the upcoming holiday). Prior to departure from site, a survey of the area where the release occurred yielded no further visible reaction and HCN measurements collected with the multiRAE did not exceed 1.0ppm.

12/29/2014

OSC Wise notified that work was halting due to lack of payment. The PRP's Conservator is currently working with the U.S. Bankruptcy court to enable the release of funds.

12/30/14 - 01/12/2014

DCE conducted rainwater management operations, but no other removal work was conducted due to funding issues. On 01/12/2015, DCE notified OSC Wise that work would recommence on 01/13/2015.

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

Waste Stream	Quantity	Manifest #	Disposal
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
Scrap Metal	80 cubic yards		Unicorn Metals and Recycling Co.
RCRA Debris	18 cubic yards	TBD	U.S. Ecology, Beatty, NV
RCRA Debris	40 cubic yards	TBD	U.S. Ecology, Beatty, NV
RCRA Debris	40 cubic yards	TBD	U.S. Ecology, Beatty, NV

2.2 Planning Section

2.2.1 Anticipated Activities

Removal activities over the next several weeks will encompass the removal of all hazardous substances left in the fire damaged building and the demolition of that structure. The PRP's contractors have also been retained to remove all hazardous substances from the non-fire damaged structure. Upon completion of the removal of hazardous substances and the demolition of the structure, the PRP has been directed by EPA to perform a subsurface assessment of the entire facility, areas impacted by contaminated fire suppression water and the Orange Park Business Park directly north of the facility.

2.2.1.1 Planned Response Activities

Demolition activities and hazardous substance removal from the fire damaged structure are anticipated to occur for the next 2-3 weeks.

2.2.2 Issues

Farmer's insurance has agreed to fund the removal action of the fire damaged building and any fire damaged chemicals.

There have been multiple small hydrogen cyanide releases from Plating Line #2.

The work stoppage was caused by a late filing with the U.S. Bankruptcy Court enabling the release of funding. the PRP's Conservator will be notified that any additional work stoppages due to funding issues will result in EPA's assumption of the removal action.

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.
AIS: American Integrated Systems
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 January 22, 2015.

7. Situational Reference Materials

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