

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #9
Progress
ALRECO Metals
C52N
Benton Harbor, MI
Latitude: 42.1389684 Longitude: -86.4362357

To:
From: Elizabeth Nightingale, OSC and Jacob Hassan, OSC
Date: 1/23/2015
Reporting Period: 1/20/15-1/23/15

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 20-23, 2015, work focused on the following activities:

Operations

- Continued transportation and disposal of waste piles 2 and 4. To date, 142 loads of this waste weighing approximately 3,595 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.

- Received Pile 3 characterization sampling results back and researched options to treat leachable cadmium;

- No shipping of baghouse dust waste for disposal this week. Remaining bags will be held until all non-conforming material is removed from Pile 3 (several bags were found in Pile 3 already). 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 ($\mu\text{g}/\text{m}^3$), 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, very 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 ($\mu\text{g}/\text{m}^3$)

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 (A faulty VOC sensor is being replaced on one AreaRae unit). 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
Unprepared steel	Solid	8.98	final		Padnos
RCRA empty containers & debris	Solid	5	estimated	A5-156-01	Republic Forest Lawn
Zinc and steel block	Solid	6.92	final		Padnos
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)
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	22.21	final	2954290	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.73	final	2954291	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.56	final	2954292	WM-Oak Ridge RDF (AL monofill)

Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954293	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954294	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954296	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954297	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954298	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954295	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954299	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954300	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954301	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954302	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954303	WM-Oak Ridge RDF (AL monofill)
Aluminum Production Waste (Piles)	Solid	25.00	estimated	2954304	WM-Oak Ridge RDF (AL monofill)

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; test the effectiveness of additives to treat leachable cadmium in Pile 3; 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

1/20/15

EPA - 1

START - 1

ERRS - 7

1/21/15

EPA - 1

START - 1

ERRS - 8

1/22/15

EPA - 1

START - 1

ERRS - 8

1/23/15

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/m ³	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/m ³	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.

7. Situational Reference Materials

No information available at this time.