

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:** Mark Johnson, ATSDR  
Dan Wyant, MDEQ  
Bill Schuette, Michigan Department of Attorney General  
Rodney Stokes, Michigan DNR  
Todd Goeks, NOAA  
Wayne Babcock, U.S. Department of Interior  
Robert Burr, U.S. Department of Interior  
Valencia Darby, U.S. DOI  
Carolyn Bohlen, U.S. EPA  
Sam Borries, U.S. EPA  
Yolanda Bouchee-Cureton, U.S. EPA  
Mark Durno, U.S. EPA  
Jason El-Zein, U.S. EPA  
HQ EOC, U.S. EPA  
Charlie Gebien, U.S. EPA  
John Glover, U.S. EPA  
Matt Mankowski, U.S. EPA  
Thomas Marks, U.S. EPA  
Mike Ribordy, U.S. EPA  
Carol Ropski, U.S. EPA  
Larry Schmitt, U.S. EPA  
Annette Trowbridge, U.S. Fish & Wildlife  
Mindy Clements, U.S. EPA

**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

|                            |              |                                |                |
|----------------------------|--------------|--------------------------------|----------------|
| <b>Site Number:</b>        | C52N         | <b>Contract Number:</b>        | EP-S5-09-05    |
| <b>D.O. Number:</b>        |              | <b>Action Memo Date:</b>       | 8/8/2014       |
| <b>Response Authority:</b> | CERCLA       | <b>Response Type:</b>          | Time-Critical  |
| <b>Response Lead:</b>      | EPA          | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL      | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  | 11/10/2014   | <b>Start Date:</b>             | 11/10/2014     |
| <b>Demob Date:</b>         |              | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         | MIN000504648 | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |              | <b>State Notification:</b>     | Yes            |
| <b>FPN#:</b>               |              | <b>Reimbursable Account #:</b> |                |

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/smeltering 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  $\text{mg}/\text{m}^3$  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 | Quantity | Manifest | Disposal |
|--------------|--------|----------|----------|----------|----------|
|--------------|--------|----------|----------|----------|----------|

|                                           |       | (Tons) | Estimated<br>Or Final? | #         |                                |
|-------------------------------------------|-------|--------|------------------------|-----------|--------------------------------|
| 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 | 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 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 | 26.8   | 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 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) |

[illegible]

|                                   |       |       |       |         |                                |
|-----------------------------------|-------|-------|-------|---------|--------------------------------|
| 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

### 2.4.1 Narrative

ERRS costs are estimated through January 20. START costs are estimated through January 23.

#### Estimated Costs \*

|                           | Budgeted              | Total To Date       | Remaining           | % Remaining   |
|---------------------------|-----------------------|---------------------|---------------------|---------------|
| <b>Extramural Costs</b>   |                       |                     |                     |               |
| ERRS - Cleanup Contractor | \$1,500,000.00        | \$589,630.99        | \$910,369.01        | 60.69%        |
| TAT/START                 | \$60,000.00           | \$49,448.00         | \$10,552.00         | 17.59%        |
| <b>Intramural Costs</b>   |                       |                     |                     |               |
|                           |                       |                     |                     |               |
| <b>Total Site Costs</b>   | <b>\$1,560,000.00</b> | <b>\$639,078.99</b> | <b>\$920,921.01</b> | <b>59.03%</b> |

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 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/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.epaosc.net/alreco>

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