

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #9
Change of Property Ownership
Highland Plating Fire
A963
Los Angeles, CA
Latitude: 34.0891180 Longitude: -118.3419480

To: Francisco Castro, Los Angeles Sanitation

From: OSC Robert Wise

Date: 7/30/2015

Reporting Period: 04/14/2015 - 07/28/2015

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 was an anodizing, plating and polishing shop. A catastrophic fire occurred at the Site on July 13, 2014, completely destroying the roof and compromising the integrity of the eastern building. The heat from the fire resulted in the failure of several plating line vats, sending their corrosive and caustic solutions into secondary containment that was quickly overwhelmed by the volume of plating chemicals and approximately 1,500,000 gallons of firefighting water with fire suppression chemicals. Significant amounts of runoff containing this mixture of water and chemicals was released from the building and entered the storm drain.

The removal at Highland Plating has been on-going for over a year. The owners of the facility have conducted a series of removals through out this year to remove the hazardous substances threats from the Site. A review of Pollution Reports 1 - 8 will document the history of this site. An annotated chronology on this Site can be found in the documents section of this website. On July 27, 2015, the property has changed ownership. The new property owner (described below) has committed to complete the removal of the hazardous substance threats from the Site. The remaining tasks to be conducted include:

- Assessment of structural contamination in the west building;
- Removal of any contaminated debris inside the west building;
- Decontamination and fixation using a soil tacifier of the structural materials inside the west building to minimize hazardous waste debris during building demolition;
- Demolition of the west building;
- Removal of the contaminated slab from the east building; and
- Excavation of contaminated soil from the property.

1.1.2 Site Description

See POLREP No. 1 for additional information.

The Site is located at 1001 N. Orange Drive (also has two other addresses: 7045 Romaine Street and 1006 Sycamore Street) Hollywood, Los Angeles County, California. The Site is located in a mixed retail and industrial district known as the Hollywood Media District.

The Site was a 33,000 square foot electro-plating and polishing facility. Highland Plating conducted chrome, nickel, and copper plating and anodizing in three plating lines contained in the eastern-most

building, and conducted polishing and gold plating in the western-most building at the Site. The east building that was damaged in the July 13, 2014 fire, has been demolished. The slab and the west building remain. All plating lines, the polishing room and the wastewater treatment areas in the west building have been dismantled and the waste removed off-site.

The polishing and wastewater treatment rooms are both contaminated. The polishing room is coated both on the surface of the structure and the interstitial spaces within the walls with heavy metal laden polishing dust. The wastewater treatment room is contaminated with wastewater treatment solids, a F-Listed RCRA hazardous waste (F006-F009).

The property directly to the north of the site, the Orange Square Business Park, sustained fire related damage due to migration of contaminated fire suppression water from the back of Highland Plating. The fire suppression water resulted in the death of a number trees and soil contamination in a planter box and beneath the parking lot.

1.1.2.1 Description of Threat

See previous POLREPS for the history of the threats on-site.

The eastern building slab poses a direct contact hazard due to the presence of chrome, nickel, lead, zinc and copper on the surface of the slab and ingrained into the concrete above the California Total Threshold Limit Concentration (TTL) hazardous waste determining levels. The slab also contains a number of below grade plating line containment areas that contain hazardous waste solids and contaminated rainwater.

On May 18 2015, EPA identified an off-site release of contaminated runoff that migrated off the slab and onto the street. Samples of this material collected by Los Angeles Water Shed Protection indicated elevated levels of heavy metals present in the runoff indicating the runoff came into contact with RCRA F-Listed waste.

The soils beneath the slab, on the parkway along Romaine Street and on the southwest corner of the Orange Square business park north of Highland are contaminated with heavy metals from fire suppression runoff above the TTL hazardous waste determining levels. The contamination goes to a depth of three to five feet below ground surface (bgs). Groundwater is at approximately 16-20 feet bgs.

The polishing room in the western building contains a large quantity of heavy metal laden polishing dust on the wall, floor, ceiling and rafter surfaces above TTL levels. Polishing dust has also been discovered in the interstitial spaces of the brick wall on the southern end of the room, inside the walls separating the polishing and gold plating rooms and in the crawl space between the first and second floors of the building. A screening XRF survey conducted by the START contractor as documented percentage concentrations of chrome, nickel, zinc, lead and copper in the polishing dust. The contractors for Highland Plating have attempted to clean this room multiple times unsuccessfully due to the sheer amount of polishing dust in the room.

The wastewater treatment room in the western building is heavily contaminated with wastewater treatment solids which are a F006 RCRA Listed Waste. There are multiple sumps in the treatment system area that are filled with contaminated rain and decontamination water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREPS Nos. 1,2, 3, 7 and 8.

See Section 1.1.2.1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Highland Plating, located in Hollywood, CA was the scene of a fire event on July 13, 2014. The fire destroyed one of two buildings on the premises. The business was in bankruptcy and in the process of shutting down when the fire occurred. The removal has consisted of two main components; 1. removal operations associated with the fire and 2. removal operations associated with the rest of the plating operations. A chronology of removal is located in the documents section of the Highland Plating website.

2.1.2 Response Actions to Date

May 18, 2015

Summary: EPA responded to an illegal discharge of contaminated runoff from the site to the gutter.

Personnel: EPA, START, DCE, LAWSP

OSC Wise discovered an off-site release at the Highland plating site of contaminated rain water. OSC Wise notified LAWSP of the release who requested EPA direct the PRP to stop the release and clean up the gutter. EPA and the START remobilized to the site on the evening of May 18, 2015 to conduct oversight of the PRP's contractor, DCE, Inc. (DCE) mitigation of the release. The release occurred because the storm water best management practices were not maintained as directed by EPA. LAWSP took over the oversight of the cleanup of the release from EPA.

June 18-19, 2015

Summary: Dismantling of the wastewater treatment system.

Personnel: DCE and START

DCE completed the demolition of the waste water treatment plant under the supervision of the START contractor. The treatment tanks that could be adequately decontaminated were sent off-site as scrap metal, those that could not were sent off-site as hazardous waste.

July 24, 2015

Summary: Job walk for future removal operations with the new land owner.

Personnel: EPA, START, 1001 N. Orange (LA), LLC, Northstar Environmental Services (NES), Ambient Environmental, Inc. (ABI).

EPA conducted a job walk with the 1001 N. Orange (LA), LLC and their contractors to discuss future response operations. NES and ABI examined the inside of the structure to determine the best strategy to assess the structural materials for waste segregation. EPA directed the contractors to provide proof of compliance with HAZWOPER, a site safety plan and a sampling plan.

EPA and

July 25, 2015

Summary: Removal of empty containers

Personnel: DCE

DCE removed several large empty poly tanks from the site. The tanks were sent to Accurate Plating, who purchased them.

July 27, 2015:

The property closed escrow and changed owners. The new owner is N. Orange (LA), LLC. ABI submitted a sampling plan for additional structural materials assessment inside the western building. The sampling plan was rejected by EPA as inadequate.

July 28, 2015

Summary: The new owners began to secure site.

The CIM Group hired 24 hour security. The sidewalk around the facility was cleared of debris and the vegetation in the parkways was trimmed to improve the appearance of the facility. They installed new storm water best management practices to prevent off-site migration of the storm water run-off from the facility.

2.1.3 Enforcement

On July 17, 2014, EPA issued notice to Highland Plating Company and its owners, Max and Drusilla Faeth ("Responsible Owners"), of potential obligations for response actions or costs under CERCLA to address hazardous substances at the Site, which EPA revised on July 24, 2014. Concerned with the lack of progress addressing the Site, EPA provided further instruction and schedules on September 16, 2014. On October 15, 2014, EPA determined that conditions at the Site presented imminent and substantial endangerment to the public health or welfare or the environment, and determined an applicable response action. The Responsible Owners thereafter committed to EPA to conduct the response action properly and promptly. EPA undertook to oversee the Responsible Owners' voluntary efforts to conduct the response action, and provided the Responsible Owners continued instruction of necessary work and appropriate schedules to conduct the work.

In early July 2015, the Los Angeles City Attorney's Office filed criminal charges against the owners of Highland Plating, Highland Plating Corporation and several former employees of Highland Plating for the discharges of contaminated water from the facility on July 13 and 14, 2014.

On July 27, 2015, the Faeth's sold the property to the CIM Group. The CIM Group has agreed to complete the cleanup. They are currently working with EPA to secure a Bona Fide Perspective Purchaser agreement. CIM Group has created a subsidiary, 1000 N. Orange (LA), LLC to purchase the property and redevelop it.

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 |
| | | | Siemens |

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| flush water | 2,300 gallons | TBD | 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 |

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| 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 | 160 cubic yards | | Unicorn Metals and Recycling Co. |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903073 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 005749303 JJK | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 0079030074 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903124 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903123 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903131 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903130 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903299 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903300 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903308 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903309 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903333 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903332 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903309 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903310 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903345 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903346 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903347 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903348 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 40 cubic yards | 007903362 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903361 FLE | U.S. Ecology, Beatty, NV |

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| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903365 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903364 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903363 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903367 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903366 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903369 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903368 FLE | U.S. Ecology, Beatty, NV |
| NA3077, Hazardous Waste, Solid, N.O.S. (Chromium, Lead), 9, PGIII RQ (D008, F006) | 18 cubic yards | 007903370 FLE | U.S. Ecology, Beatty, NV |
| UN 3264 Waste Corrosive, Liquid, Acidic, Inorganic, N.O.S. (Copper Sulfate) | 16 gallons | 013770327 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 3264 Waste Corrosive, Liquid, Acidic, Inorganic, N.O.S. (Copper Sulfate) | 16 gallons | 013770327 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 3264 Waste Corrosive, Liquid, Acidic, Inorganic, N.O.S. (Copper Sulfate) | 16 gallons | 013770327 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 3266 Waste Corrosive, Liquid, Basic, Inorganic, N.O.S. (Sodium Hydroxide) | 16 gallons | 013770331 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste Liquid (NIMAC Iron Control 8120) | 55 gallons | 013770331 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1935 Waste Cyanide Solutions N.O.S. (Potassium Cyanide) | 16 gallons | 013770336 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1789 Waste Hydrochloric Acid Solution | 5 gallons | 013770335 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1789 Waste Hydrochloric Acid | 55 gallons | 013770335 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Liquid (Sodium Phosphite Water) | 5 gallons | 013770318 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Liquid (Sodium Phosphite Water) | 16 gallons | 013770318 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 2926 Waste Flammable Solid, Toxic, Organic, N.O.S. (Sodium Nitrobenzoate) | 10 gallons | 013770328 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1935 Waste Cyanide Solutions N.O.S. (Potassium Cyanide) | 5 gallons | 013770328 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1263 Waste Paint Related Material N.O.S. (Paint Acetone) | 55 gallons | 010822936 JJK | Demeno/Kerdoon, Inglewood, CA |
| UN 1498 Waste Sodium Nitrate | 350 gallons | 013770313 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Solid (Diatomaceous Earth) | 50 gallons | 013770313 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Liquid (Nickelacetate Water) | 55 gallons | 013770313 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Liquid (Nickelacetate Water) | 15 gallons | 013770313 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1587, Waste Copper Cyanide | 80 gallons | 013770320 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1587, Waste Copper Cyanide | 50 gallons | 013770320 JJK | 21st Century EMn, LLC, Fernley, CA |

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| UN 1587, Waste Copper Cyanide | 50 gallons | 013770320 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1587, Waste Copper Cyanide | 30 gallons | 013770320 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 2789,, Waste Acetic Acid, Glacial | 16 gallons | 013770316 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 2672, Waste Ammonia Solution | 55 gallons | 013770316 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 3066, Waste Paint Related Material (Methylene Chloride, Methanol) | 55 gallons | 013770316 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 2491, Waste Ethanolamine (Monoethanolimine, Water) | 55 gallons | 013770316 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 3077 Environmentally Hazardous Substance, Solid, N.O.S. (Nickel Hydroxycarbonate) | 70 gallons | 013770317 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1789, Waste, Hydrochloric Acid Solution | 55 gallons | 013770317 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1824, Waste, Sodium Hydroxide Solution | 110 gallons | 013770317 JJK | RHO-CHEM, LLC, Inglewood, CA |
| Non RCRA Hazardous Waste, Liquid (Sodium Hydropophosphate and Water) | 55 gallons | 013770317 JJK | RHO-CHEM, LLC, Inglewood, CA |
| UN 1587, Waste Copper Cyanide | 50 gallons | 013770321 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1713, Waste Zinc Cyanide | 50 gallons | 013770321 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 55 gallons | 013770321 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 55 gallons | 013770321 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 55 gallons | 013770322 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 16 gallons | 013770322 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 20 gallons | 013770322 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 1935, Waste Cyanide Solution N.O.S. (Copper Cyanide Solution) | 5 gallons | 013770322 JJK | 21st Century EMn, LLC, Fernley, CA |
| UN 2506, Waste Mercury Contained Manufacture Articles | 5 pounds | 013770325 JJK | Vielia ES Technical Solutions, Azusa, CA |
| UN 1993, Waste Flammable Liquid N.O.S. (Acetone) | 55 gallons | 013770324 JJK | Pacific Resources Recovery Services, Inc., Los Angeles, CA |
| UN 3098, Waste Oxidizing Liquid, Corrosive, N.O.S. (Sodium Chlorite, Sodium Hydroxide) | 16 gallons | 013770326 JJK | Rho-Chem LLC, Inglewood, CA |
| UN 3098, Waste Oxidizing Liquid, Corrosive, N.O.S. (Sodium Chlorite, Sodium Hydroxide) | 16 gallons | 013770326 JJK | Rho-Chem LLC, Inglewood, CA |
| UN 3098, Waste Oxidizing Liquid, Corrosive, N.O.S. (Sodium Chlorite, Sodium Hydroxide) | 16 gallons | 013770326 JJK | Rho-Chem LLC, Inglewood, CA |
| UN 3098, Waste Oxidizing Liquid, Corrosive, N.O.S. (Sodium Chlorite, Sodium Hydroxide) | 55 gallons | 013770326 JJK | Rho-Chem LLC, Inglewood, CA |
| UN 1993, Waste Flammable Liquids, N.O.S., (Acetone, Paint), III, (D001) | 55 gallons | 013770271 JJK | Demunno/Kerdoon |

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| Non-RCRA Hazardous Waste Liquid (Oil, Lubricant) | 55 gallons | 013770271 JJK | Demunno/Kerdoon |
| UN3264, Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (Sulfuric Acid, Phosphoric Acid), 8, III (D002) | 55 gallons | 013770264 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3264, Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (Phosphoric Acid), 8, III (D002) | 55 gallons | 013770264 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN2822 Waste Corrosive Liquids, Toxic, N.O.S. (Trichloroacetaldehyde), 8, (6.1), III (D002) | TBD | 013770264 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN2820 Waste Corrosive Liquid, Flammable, N.O.S. (ethylenediamine methanol), 8, III (D001) | 55 gallons | 013770264 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3082, Waste Environmentally Hazardous Substances Liquid, N.O.S. (Nickel Sulfate), 8, II | 55 gallons | 013770265 JJK | RHO-CHEM LLC, Inglewood, CA |
| NA3082, Hazardous Waste Liquid, N.O.S. (chrome)8, III | 55 gallons | 013770265 JJK | RHO-CHEM LLC, Inglewood, CA |
| NA3077 Hazardous Waste Solid N.O.S. (chrome) 9, III (D007) | 40 gallons | 013770265 JJK | RHO-CHEM LLC, Inglewood, CA |
| Non-RCRA Hazardous Waste Liquid | 55 gallons | 013770265 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S. (Sodium Hydroxide), 8, III (D002) | 55 gallons | 013770266 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S. (Potassium Hydroxide, Ammonium Hydroxide), 8, III (D002) | 55 gallons | 013770266 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S. (Sodium Metasilicate Sodium Hydroxide), 8, III (D002) | 55 gallons | 013770266 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S. (Potassium Hydroxide), 8, III (D002) | 55 gallons | 013770266 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 1758, Corrosive Solids, N.O.S. (Sodium Metabisulfite), 8, III | 25 pounds | 013770267 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3265 Waste Corrosive Liquid, Acidic, Organic, N.O.S., (Hydroxyacetic Acid), 8, III | 5 gallons | 013770267 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN 3262, Corrosive Solid, Basic, Inorganic, N.O.S., (Caustic Soda, Limestone), 8, III | 60 pounds | 013770267 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3260, Corrosive Solid, Acidic, Inorganic, N.O.S., (Ammonium Bifluoride), 8 III | 25 pounds | 013770267 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN1325, Waste Flammable Solid, Toxic, N.O.S. (ink powder), 4.1, III | TBD | 013770268 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3087 Waste Oxidizing Solid, Toxic, N.O.S., (Chromic Acid, Barium Nitrate), 5.1, (8.1), II | 15 pounds | 013770268 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3072, Waste Oxidizing Solid, Toxic, N.O.S., (Potassium Dichomate), 5.1, III (D007) | 25 pounds | 013770268 JJK | RHO-CHEM LLC, Inglewood, CA |
| Non-RCRA Hazardous Waste Solid (Powder Dye) | TBD | 013770268 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN1436, Waste Zinc Power, 4.1, I | 5 pounds | 013770270 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3288, Toxic Solid Inorganic, N.O.S. (Sodium Fluoride), 6.1, III | 25 pounds | 013770270 JJK | RHO-CHEM LLC, Inglewood, CA |

| | | | |
|--|----------------|----------------|------------------------------------|
| UN2611 Toxic Solid Inorganic, N.O.S., (Oxalic Acid), 6.1, III | 25 pounds | 013770270 JJK | RHO-CHEM LLC, Inglewood, CA |
| UN3287 Toxic Liquids, Inorganic, N.O.S (Nickel Sulfate, Magnesium Fluorosilicate), 6.1, II | 55 gallons | 013770270 JJK | RHO-CHEM LLC, Inglewood, CA |
| Non-RCRA Hazardous Waste Liquid(oil) | 110 gallons | 013770272 JJK | RHO-CHEM LLC, Inglewood, CA |
| Non-RCRA Hazardous Waste Liquid (Ethylene Glycol) | 110 gallons | 013770270JJK | RHO-CHEM LLC, Inglewood, CA |
| MAPP Gas Cylinders | 5 gallons | Bill of Lading | Stoody Industrial |
| UN1950 Aerosols, Flammable, 2.1 "Universal Waste" | 5 gallons | Bill of Lading | Veolia ES Technical Solutions, LLC |
| UN 1992 Waste Flammable Liquids, N.O.S. (Acetone, Paint, 3, III | 1 cubic yard | 013770271 JJK | Demeno Kerdoon |
| Non-RCRA Hazardous Waste Liquid (Oil, Lubricant) | 1 cubic yard | 013770271 JJK | Demeno Kerdoon |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Water from Plating Shop), 9, III | 4,700 gallons | 007903537 FLE | Evoqua Water Technologies, LLC |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Water from Plating Shop), 9, III | 4,850 gallons | 007903536 FLE | Evoqua Water Technologies, LLC |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Water from Plating Shop), 9, III | 1,600 gallons | 007903551 FLE | Evoqua Water Technologies, LLC |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Chromium, Barium), 9, III | 4,250 gallons | 007903646 FLE | US Ecology |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Chromium, Barium), 9, III | 4,900 gallons | 007903647 FLE | US Ecology |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Chromium, Barium), 9, III | 4,800 gallons | 007903649 FLE | US Ecology |
| RQ. NA3082 Hazardous Waste, Liquid, NOS (Chromium, Barium), 9, III | 3,800 gallons | 008258016 FLE | US Ecology |
| RQ. NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III | 50 cubic yards | 008258096 FLE | US Ecology |
| RQ. NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III | 20 cubic yards | 008258097 FLE | US Ecology |

2.2 Planning Section

2.2.1 Anticipated Activities

Farmers Insurance Exchange (Farmers), which represents Highland Plating has agreed to conduct the removal actions at the Orange Square Business Park. EPA is currently awaiting the start date for that operation.

2.2.1.1 Planned Response Activities

The property has changed ownership. The new owner, The CIM Group, will be completing the removal action. Removal tasks to be completed include:

- Assessment of structural contamination in the west building;
- Removal of any contaminated debris inside the west building;
- Decontamination and fixation using a soil tacifier of the structural materials inside the west building to minimize hazardous waste debris during building demolition;
- Demolition of the west building;
- Removal of the contaminated slab from the east building; and
- Excavation of contaminated soil from the property.

2.2.2 Issues

- The new owner is seeking BFPP protection from EPA; and
- Removal operations at the Orange Square Business Park. Highland's insurance company is in conflict the property owner, Ralco, Inc., as to the amount of soil that needs to be removed. EPA notified both parties if this issues is not resolved and the cleanup completed by September 28, 2015, EPA will be referring this site to DTSC for cleanup oversight.

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

EPA is the lead agency for the cleanup.

3.2 Cooperating Agencies

LASWP is assisting in the oversight activities.

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

HHMD: 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

TTLIC: Total Threshold Limit Concentration

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 be on August 8, 2015.

7. Situational Reference Materials

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