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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #10**
PRP removal action to remove off-site contamination due to fire suppression water at Ralco Property
Highland Plating Fire
A963
Los Angeles, CA
Latitude: 34.0891180 Longitude: -118.3419480

To: Francisco Castro, Los Angeles Sanitation

From: OSC Robert Wise
Date: 9/7/2015
Reporting Period: 07/28/2015 -09/07/2015

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:

- 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 will 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. The contaminated soil was removed starting on August 31, 2015. These removal activities will be discussed under this POLREP.

1.1.2.1 Description of Threat

See POLREP No. 9 for the "Description of Threat".

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

Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

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

August 21, 2015

Summary: EPA met with CIM group and their assessment contractor, Citadel to discuss sampling of structural materials.

Personnel: EPA, START, CIM, Citadel

The new property owner, CIM Group retained Citadel to conduct the structural materials assessment. Citadel provided EPA with a Sampling and Analytical Plan on the morning of August 21, 2015.
EPA met with representatives of the CIM group and Citadel to discuss the strategy and sampling plan comments associated with the structural assessment of the building. The areas to be sampled were determined. CIM also directed Citadel to address all remaining waste on the property in their sample planning which included drums and totes of contaminated water and sumps/pits containing contaminated water and sludge.

August 24, 2015

Summary: Assessment of the structural contamination in the West building at Highland Plating.

Personnel: START, CIM, Citadel

Citadel provided EPA with the revised Sampling Plan on July 24, 2015 which was reviewed and approved. Citadel began began to collect the structural materials samples. Samples included cores of building materials such as wood and drywall; bulk polishing dust; water from the clarifiers inside the building, possible asbestos containing materials from the roof and water from the drums and totes left over from the former owner.
The START provided oversight of the sampling.

August 25, 2015

Summary: Completion of the structural materials sampling.

Personnel: Citadel

Citadel completed the sampling of the structural materials of the remaining building.

August 31, 2015

Summary: Removal operations at Orange Square Business Park commenced.

Personnel: EPA, START, DCE, ACT, JAG, Frey Environmental Services (FES)

The removal of contaminated soil at the Orange Square Business Park generated due to contact with fire suppression water the night of the fire began. The Orange Square Business Park is directly north adjacent to Highland Planting. Three areas were designated for excavation based on the sampling (designated as east, middle and west). ACT removed the asphalt covering all three excavation areas They attempted to load the asphalt into the truck for off-site disposal, but were unable to because of because the right type of excavator bucket was not present. . The excavation of the soil did not begin because the excavator was not delivered with the correct bucket. JAG began to set up the air surveillance program which consisted of monitoring for total dust and hydrogen cyanide. JAG required extensive technical assistance from START to set up the equipment. JAG also required extensive assistance from START in the set up of the XRF. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

September 1, 2015

Summary: Continuation of removal operations at the Orange Square Business Park.

Personnel: EPA, START, DCE, ACT, JAG, FES

The excavation of soil commenced from the East excavation. The soil was tranloaded directly into end dumps. The excavation was approximately 10'x20'x4.5'. The asphalt from last night was also loaded into a dump truck and sent to a recycling facility using a skid steer delivered to the site earlier. JAG and FES conducted confirmation sampling in accordance with the EPA approved sampling plan in the East excavation. The assessment included an XRF survey of the excavation. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

JAG set up air surveillance including personal air sampling of the JAG personnel entering the excavation to collect the samples. At EPA's direction, START also set up air surveillance. START utilized VIPER to track the data in real time. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

September 2, 2015

Summary: Continuation of removal operations at the Orange Square Business Park.

Personnel: EPA, START, DCE, ACT, JAG, FES

Excavation of the Middle excavation commenced tonight. The soil was loaded directly into end dumps for off-site disposal. The excavation was approximately 10'x20'x6'. Upon completion of the Middle excavation, the West excavation was commenced. The excavation was not completed because, their was not enough end dump capacity.

JAG set up air surveillance including personal air sampling of the JAG personnel entering the excavation to collect the samples. At EPA's direction, START also set up air surveillance. START utilized VIPER to track the data in real time.

OSC Wise directed JAG not to enter the excavation due to the depth. OSHA requires all excavations over 5' bgs to be shored. JAG sampled from the street level as far as they could reach and with the excavator for the bottom. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

Analytical data from the excavation of the East excavation documented chromium concentrations in excess of the action level (50 x STLC) on the south wall of the excavation. That wall will have additional soil removed. This confirmation data will be posted on the documents section of the web site.

September 3, 2015

Summary: Continuation of removal operations at the Orange Square Business Park.

Personnel: EPA, START, DCE, ACT, JAG, FES

Excavation of the West excavation was completed. In addition to the soil on the Orange Square Business Park, a small section of the parkway on Romaine Street was to excavated and funded by Farmer's. An area approximately 25'x'3'x2.5 was excavated on the parkway on Romaine Street. JAG and FES conducted confirmation sampling at both locations. The sampling of the West excavation was conducted using the excavator due to the depth of the excavation. Sample data from the East excavation documented contamination above the action level remaining in the hole. ACT began the excavation of this material, but was forced to stop when the

JAG and START conducted air surveillance. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

September 4, 2015

Summary: Continuation of removal operations at the Orange Square Business Park.

Personnel: DCE, ACT, JAG, FES

EPA did not conduct oversight this night. ACT/DCE completed all of the excavations. However, the land owner identified an additional areas to be excavated. After examining newly provided data on this location, EPA directed Farmer's to conduct the removal of this soil. JAG conducted air surveillance. JAG and FES completed the confirmation sampling. Work was conducted at night to minimize the impact to the tenants of the Orange Square Business Park.

September 7, 2015: No work on-site, awaiting laboratory data.

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 Fida 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
flush water	2,300 gallons	TBD	Siemens Technology, Vernon, CAEvoqua 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	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
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	Demenno/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
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 Hydroxicarbonate)	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	Demenno/Kerdoon
Non-RCRA Hazardous Waste Liquid (Oil, Lubricant)	55 gallons	013770271 JJK	Demenno/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. (Trichloroacetaldyde), 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., (Hydrooxyacetic 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	0137702702JJK	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
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948612 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948613 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948614 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948632 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948633 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	23 tons	008948634 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	17,4	008948635 FLE	U.S. Ecology
NA3077 Hazardous Waste, solid, nos. (chromium, lead). 9, III	9.14	008538753 JJK	U.S. Ecology

2.2 Planning Section

2.2.1 Anticipated Activities

Farmer's Insurance is currently conducting a removal action at the Orange Square Business Park. Removal activities at the main Highland Plating site is expected to begin late in the week starting September 7, 2015.

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.
- The demand of the land owner at Orange Square Business Park that the California Waste Extraction Test (WET) be conducted during the confirmation sampling is slowing down the completion of the removal.

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 Enviromental 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
FES: Frey Environmental Services
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
TTLC: 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 On September 14, 2015.

7. Situational Reference Materials

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