

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Michner Plating - Mechanic Street Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

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From: Jeffrey Kimble, OSC

Date: 10/6/2015

Reporting Period:

1. Introduction

1.1 Background

Site Number:	C57C	Contract Number:	
D.O. Number:		Action Memo Date:	7/2/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/24/2015	Start Date:	8/24/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action.

1.1.2 Site Description

Michner Plating Mechanic Street (Site) is a former plating shop which operated from the 1930s until 2007. Michner Plating also operated a separate facility on Angling Road in Jackson, Michigan, until May 2015. The Site contains approximately 1,100 drums, vats, totes, and other containers. Labels and sample analytical results indicate the potential presence of cyanide, zinc cyanide, nickel chloride, chromic acid, hydrogen peroxide, sulfuric acid, ignitable wastes, reactive wastes (including water reactive chemicals), and other chemicals.

1.1.2.1 Location

The Site is located at 520 North Mechanic Street in Jackson, Jackson County, Michigan, in a mixed commercial and residential area and is bound to the north by a commercial property, to the east by North Mechanic Street with residential dwellings and commercial properties beyond, to the south by East Trail Street with commercial properties beyond, and to the west by a railroad and the Grand River. The Site sits on roughly 4 acres, and contains four buildings totaling approximately 137,000 square feet.

1.1.2.2 Description of Threat

The Site contains approximately 1,100 drums, vats, totes, and other containers. Labels and sample analytical results indicate the potential presence of cyanide, zinc cyanide, nickel chloride, chromic acid, hydrogen peroxide, sulfuric acid, ignitable wastes, reactive wastes (including water reactive chemicals), and other chemicals.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA previously conducted an assessment and determined a Time-Critical Action was warranted. See Sitrep 1 for additional information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA began a Time-Critical action consisting of the removal of over 1,100 containers of hazardous waste on August 24, 2015.

2.1.2 Response Actions to Date

9/28/2015 – Crews collected samples from containers 981 through 1005, vats 052 through 058, and tanks T011 and T012. Hazard categorization of samples and bucket bulking compatibility tests continued. The crew resampled container 538 (a 250-gallon tote containing an unknown liquid) and conducted additional hazard categorization of the sample. The sample exhibited signs of such strong acidity that other tests could not be performed on the material. The crew moved the tote to an isolated area in the staging area, and placed it a bermed staging pad. Crews searched through the office and warehouse buildings to find additional containers, and moved the containers into the staging area in the warehouse. The crew received 12 55-gallon poly drums and 2 250-gallon poly totes which will be used during waste bulking.

9/29/2015 – Crews collected samples from containers 1006 through 1030. Crews also identified containers in the office building that could not be moved into the warehouse building, and labeled the containers as B001, B002, B003, etc. Crews collected samples from B001 through B015. Hazard categorization of samples and bucket bulking compatibility tests continued. Crews created an area for waste bulking activities in the staging area with poly sheeting surrounded by a wood berm. Crews identified the first set of 24 containers with compatible materials, moved some of the containers into the bulking area, and began waste bulking of the materials. The materials were non-cyanide containing alkaline liquids and solids. The liquids from the containers were combined in a 250-gallon tote. Sludge or solid materials were combined in a 55-gallon drum. The tote and drum of combined materials were labeled as Comp 1, which is for "Composite Sample 1" which is being sent to an independent laboratory for analytical testing for use in creating the disposal profile.

9/30/2015 – Hazard categorization of samples and bucket bulking compatibility tests continued. Crews also measured containers in the office building to determine the volume of materials contained in each. Crews continued moving containers into the bulking area and waste bulking of the non-cyanide containing alkaline liquids and solids. Crews filled the tote they had been combining liquids in, sealed and cleaned the tote, and moved it out of the bulking area. Crews began combining the non-cyanide containing alkaline liquids in a new tote.

10/01/2015 – Hazard categorization of samples and bucket bulking compatibility tests continued. Crews completed waste bulking of the first set of 24 containers of non-cyanide containing alkaline liquids and solids. Crews cleaned and swept the bulking area, and moved empty containers to the northern portion of the building.

10/02/2015 – Hazard categorization of samples and bucket bulking compatibility tests continued. The chemist generated a list of an additional 12 containers with compatible materials, and the crew began waste bulking of the materials. The materials were non-cyanide containing alkaline liquids and solids. Due to the poor condition of the containers, the crews combined the liquids from each container prior to moving them into the bulking area. The liquids were combined in a 55-gallon drum. The crews also scooped waste material located on the floor inside a concrete berm around tanks T009 and T010 into a 55-gallon drum, and collected a composite sample of the material. The material around the tanks is reportedly due to leaks from the tanks. While scooping, the crews hit a pipe connected to tank T009, and a few ounces of liquid spilled onto the ground. No evidence of a reaction was observed, and no elevated readings were detected with the air monitoring equipment. Crews used solidified the recoverable liquid, and placed the material into the 55-gallon drum. Crews also began cataloging and segregating small containers (less than 5-gallons each) in the staging area that have not been sampled. Electricians were onsite completing work to connect the office trailers to the local power grid. The EPA Haz-Cat trailer was demobilized to another Region 5 Time Critical Removal Site. Hazard categorization and bucket bulking tests will be completed in the eastern portion of the warehouse building in an area set up to support this work.

From 10/03-04/2015, no site work occurred. 24-hour security was on site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Michner Plating Company is the potentially responsible party (PRP), however, the company relinquished ownership of the property to the Jackson County Treasurer's Office due to tax reversion and bankruptcy. The removal action is a Fund Lead as a result of the RP's bankruptcy and inability to finance the cleanup.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Anticipated activities for the next reporting period include continuing to collect samples, performing hazard categorization of the samples collected from on-site containers, bucket compatibility tests for each waste bulking group, and the continuation of waste bulking.

2.2.1.1 Planned Response Activities

Inventory and perform hazard characterization on all substances contained in containers, drums, tanks and spilled material on the floor and in pits;

Investigate the potential for soil contamination on the property;

Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;

Dismantle and decontaminate process equipment, tanks and building components associated with the product process area, as necessary;

Remove from site and recycle or dispose of vats and waste containers and contaminated process equipment;

Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA approved disposal facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440);

Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps

Continue to perform the planned response actions until cleanup is complete.

2.2.2 Issues

No issues to report at this time.

2.3 Logistics Section

Site logistics are being managed by ERRS.

We are trying to establish a power drop from the power company to provide site power. We are currently operating off generators until this can be established.

2.4 Finance Section

2.4.1 Narrative

This removal action will require an estimated 95 working days to complete.

Estimated Costs *

		Total To		%
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	Budgeted	Date	Remaining	Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,000,000.00	\$404,796.00	\$595,204.00	59.52%
IAGs	\$48,500.00	\$12,314.56	\$36,185.44	74.61%
TAT/START	\$160,000.00	\$54,770.08	\$105,229.92	65.77%
Intramural Costs				
USEPA - Direct	\$75,000.00	\$25,314.59	\$49,685.41	66.25%
USEPA - InDirect	\$40,000.00	\$15,208.19	\$24,791.81	61.98%
Total Site Costs				
	\$1,323,500.00	\$512,403.42	\$811,096.58	61.28%

* 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

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Jackson County Treasurer's Office
City of Jackson Water Department
Michigan Department of Environmental Quality (MDEQ)

4. Personnel On Site

EPA: 2
USCG: 2
START: 2
ERRS: 10

5. Definition of Terms

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
EPA Environmental Protection Agency
ERRS Emergency and Rapid Response Service
MDEQ Michigan Department of Environmental Quality
mg/kg milligrams per kilograms
OSC On Scene Coordinator
PPE Personal Protective Equipment
RCRA Resource Conservation and Recovery Act
PRP Potentially Responsible Party
START Superfund Technical Assessment and Response Team
USCG United States Coast Guard

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.