

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #5**
Progress
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

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From: Jeffrey Kimble, OSC

Date: 10/20/2015

Reporting Period: 10/05-16/2015

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

10/05/2015 – Hazard categorization of samples and compatibility tests continued. The chemist added 6 containers of non-cyanide containing alkaline liquids and solids to the previous list of 12, and the crew continued waste bulking of the materials. Some of the solid material encountered was very hard, and crews were unable to break up the material and transfer it to new containers using hand tools. The RM will attempt to procure a jackhammer with an air compressor to facilitate breaking up the material. Crews continued cataloging and segregating small containers (less than 5-gallons each) in the staging area that have not been sampled. Electricians were onsite working to connect the office trailers to the local power grid. Crews received a shipment containing 15 250-gallon totes, 60 poly and steel 55-gallon drums, and 15 cubic yard boxes which will be used for waste material bulking.

10/06/2015 – Compatibility tests continued, however, no hazard categorization activities were completed. Crews completed bulking of the 18 containers of non-cyanide containing alkaline liquids and solids. The combined materials have not been sent to a laboratory for analytical testing, therefore, the drums of combined materials were not assigned a Composite #. Crews continued to encounter very hard solid material during waste material bulking which could not be broken up and transferred. Crews transferred as much of the material to the new containers as possible, then covered the drums and the remaining material with poly sheeting. Crews will either overpack the drums or break up the material and transfer it to new containers once a jackhammer is onsite. Crews also finished cataloging and segregating small containers (less than 5-gallons each) in the staging area. Electricians continued work to connect the office trailers to the local power grid.

10/07/2015 – Hazard categorization of samples and compatibility tests continued. The chemist generated a list of 24 containers with flammable liquids and solids, and the crew began waste bulking of the materials. The liquids and solids were combined into separate 55-gallon drums. The drums were labeled as Comp 2, which is for "Composite Sample 2" which is being sent to an independent laboratory for analytical testing for use in creating the disposal profile. Representatives of Consumers Energy were onsite working to connect the office trailers to the local power grid.

10/08/2015 - Hazard categorization of samples and compatibility tests continued. Crews completed bulking of the flammable liquids and solids in Composite 2. The chemist generated a new list of 24 containers with flammable liquids and solids, and the crew began waste bulking of the materials. The liquids and solids were combined into separate 55-gallon drums. The drums were labeled as Comp 3, which is for "Composite Sample 3". Electricians completed connecting the office trailers to the local power grid.

From 10/09-13/2015, no site work occurred. 24-hour security was on site.

10/14/2015 - Hazard categorization of samples continued. Crews continued bulking of the flammable liquids and solids in Composite 3. The chemist generated a new list of 26 vats with cyanide containing alkaline solids, and the crew began waste bulking of the materials. The solids from the vats were combined into cubic yard boxes lined with black poly sheeting. Crews received a jackhammer with an air compressor, which will be used to break very hard materials into manageable pieces so that the material can be placed into new containers disposal as needed. Electricians were onsite to hardwire the EPA Air Trailer to the onsite generator.

10/15/2015 – Hazard categorization of samples continued. Crews completed bulking of the flammable liquids and solids in Composite 3. The chemist generated a new list of 24 containers with flammable liquids and sludge, and the crew began waste bulking of the materials. The liquid was combined into a 250-gallon tote, and the sludge was combined in a steel 55-gallon drum. The tote and drums were labeled as Comp 4, which is for "Composite Sample 4". Crews continued bulking the cyanide containing alkaline solids from

the vats. Crews received a shipment of 40 steel 55-gallon drums, which will be used for waste material bulking.

10/16/2015 – Hazard categorization of samples continued, however, no bucket bulking tests were conducted. Crews completed bulking of the flammable liquids and sludge in Composite 4. Crews continued bulking the cyanide containing alkaline solids from the vats.

10/17-18/2015 - no site work occurred. 24-hour site security was in place.

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.

Permanent power has been established.

2.4 Finance Section

No information available at this time.

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.