

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #6
Progress
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

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From: Jeffrey Kimble, OSC

Date: 10/26/2015

Reporting Period: 10/19-23/2015

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

10/19/2015 - Hazard categorization of samples continued. The chemist generated a new list of 25 containers with flammable liquids and sludge, and the crew completed waste bulking of the materials. The liquid and sludge were combined into separate 55-gallon drums, which were labeled as Comp 11, for "Composite Sample 11". Crews continued bulking the cyanide containing alkaline solids from the vats. The chemist generated another list of 21 containers with cyanide containing alkaline liquids and sludge from drums, and the crew began waste bulking of the materials. The liquids and sludge were combined in separate 55-gallon drums, which were labeled as Comp 14, for "Composite Sample 14".

10/20/2015 – No hazard categorization was conducted. Crews continued bulking the cyanide containing alkaline liquids and sludge from drums, and the cyanide containing alkaline solids from vats.

10/21/2015 – No hazard categorization was conducted. Crews continued bulking the cyanide containing alkaline solids from the vats. The crew ran out of open-topped poly drums which are used for bulking solid materials from drums, and could not finish bulking the solids in Comp 14. The crew noted the drums in Comp 14 that have not been transferred to new drums, and will continue bulking the materials in Comp 14 once the drums are delivered. The chemist generated a new list of 25 containers with flammable liquids and sludge, and the crew began waste bulking of the materials. The liquid and sludge were combined in separate 55-gallon drums, which were labeled as Comp 15, for "Composite Sample 15".

10/22/15 – No hazard categorization was conducted. Crews continued bulking flammable liquids and sludge from Comp 15, and continued bulking cyanide containing alkaline solids from the vats. While the crew was bulking material from one of the vats, identified as V009, sustained levels of hydrogen cyanide were detected in the breathing zone above the site Action Level of 2.0 parts per million (ppm). Therefore, the crew upgraded to level B PPE during waste bulking of the material from this vat. The crew completed bulking the material in vat V009.

10/23/15 - Hazard categorization of samples continued. Crews completed bulking flammable liquids and sludge from Comp 15, and continued bulking cyanide containing alkaline solids from the vats. No hydrogen cyanide was detected in the breathing zone above the site Action Level of 2.0 ppm during waste bulking today. The chemist generated a new list of 23 containers with flammable liquids and sludge, and the crew began waste bulking of the materials. The liquid and sludge were combined in separate steel 55-gallon drums, which were labeled as Comp 16, for "Composite Sample 16".

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>

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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.