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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #8**
Progress
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

To: Mark Johnson, ATSDR
Michelle Watters, ATSDR
Michael Chezik, Department of Interior
Mark Durno, U.S. EPA
Jason El-Zein, U.S. EPA
HQ EOC, U.S. EPA
John Glover, U.S. EPA
Luke Jones, U.S. EPA
Matt Mankowski, U.S. EPA
Jennifer Manville, U.S. EPA
Cecilia Moore, U.S. EPA
Carol Ropski, U.S. EPA
Brian Schlieger, U.S. EPA
Annette Trowbridge, U.S. Fish & Wildlife
USCG USCG, USCG
Daveda Quinn, City of Jackson
Mitch Adelman, MDEQ
Karen Coffman, Jackson County Treasurer
Diane Donaldson, Jackson County
Ken Mroczowksi, MDEQ
Deb Snell, MDEQ
Robert Thompson, EPA
David Wooden, Jackson Fire Department

From: Jeffrey Kimble, OSC
Date: 11/9/2015
Reporting Period: 11/2/2015 to 11/8/2015

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

11/2/15 - The chemist conducted bucket bulking compatibility tests. The chemist also generated a list of 24 drums with cyanide containing alkaline solids, and the crew completed waste bulking of the materials. The material was combined in cubic yard boxes, which were labeled as Comp 5, for “Composite Sample 5”. The crew also continued bulking cyanide containing alkaline solids from the vats. While transferring the contents of vat V047, members of the crew outside the exclusion zone noticed an odor which was suspected to be ammonia. Crews inside the exclusion zone were wearing level C PPE. Crews collected a sample, and used the Hazmat ID-360 to identify the material. The material was identified as hydrogen peroxide and ammonium iodide. Ammonia levels did not increase above the site Action Level, therefore, the crew remained in level C PPE, and completed transferring vat V047. The crew also began cutting empty poly drums and loading them into the roll-off dumpster.

11/3/15 – The chemist conducted bucket bulking compatibility tests. The chemist also generated a list of 24 containers with neutral liquids, and the crew completed waste bulking of the materials. The liquid was combined in a 250-gallon tote, and any sludge or solid was combined in 55-gallon drums, which were labeled as Comp 18, for “Composite Sample 18”. Crews also continued bulking cyanide containing alkaline solids from the vats, and cutting the empty poly drums and loading them into the roll-off dumpster.

11/4/15 – The chemist conducted bucket bulking compatibility tests. The chemist also generated a list of 10 containers with acidic liquids, and the crew completed waste bulking of the materials. The liquid was combined in a 250-gallon tote, and any sludge or solid was combined in 55-gallon drums, which were labeled as Comp AB1, for “Composite Sample Acid Bulking Group 1”. While bulking the acidic liquids, hydrogen cyanide (HCN) was detected in the breathing zone above the site Action Level of 4.7 parts per million (ppm). Therefore, the crews upgraded to level B PPE during waste bulking of the materials. Crews also continued cutting the empty poly drums and loading them into the roll-off dumpster. The crew filled one roll-off dumpster, covered it with poly, and staged the dumpster outside. The crew also received 15 cubic yard boxes to be used for bulking waste solids, and recycled six 55-gallon bags of plastic bottles.

11/5/15 – The chemist conducted bucket bulking compatibility tests. The chemist also generated a list of 25 drums with non-cyanide containing alkaline solids, and the crew began bulking the materials. The material was combined in cubic yard boxes, which were labeled as Comp 6, for “Composite Sample 6”. Crews also continued cutting empty poly drums and loading them into the second roll-off dumpster. The crew also began sweeping the floors in the central portion of the building.

11/6/15 – The chemist conducted bucket bulking compatibility tests. The chemist identified 28 additional drums with non-cyanide containing alkaline solids, and the crew continued bulking the materials. Crews also continued cutting empty poly drums and loading them into the roll-off dumpster. The crew also completed an emergency evacuation drill.

On 11/7/2015 and 11/8/2015, 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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

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.