

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #10
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 Mroczowski, MDEQ
Deb Snell, MDEQ
Robert Thompson, EPA
David Wooden, Jackson Fire Department

From: Jeffrey Kimble, OSC
Date: 12/8/2015
Reporting Period: 1/16/2015-12/4/2015

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

11/16/2015 - The crew finished bulking the cyanide containing alkaline solids in Composite group 13. The chemist generated a new list of 5 containers with neutral liquids, and the crew completed bulking these materials. The material was combined in 55-gallon drums, which were labeled as Comp 8A, for "Composite Sample 8A". The chemist also generated a list of 24 containers with flammable liquids, sludge, and solids, and the crew began bulking the materials. The material was combined in 55-gallon drums. The crew also transferred materials from the 8 compartments of V056 (identified as V056A through V056H), and loaded the material into 8 separate 35-gallon drums.

11/17/15 – The crew finished bulking the list of 24 containers with flammable liquids, sludge, and solids. The chemist generated 2 new lists, each with 32 drums with cyanide containing alkaline solids, and the crew began bulking the materials. One list contained solids with cyanide levels up to 3 parts per million (ppm), and the second list contained solids with cyanide levels up to 10 ppm.

11/18/2015 – The chemist conducted bucket bulking tests. The crew completed transfer of the materials in 29 out of 32 drums on the low cyanide solids list (up to 3 ppm cyanide levels), and 20 out of 32 drums on the medium cyanide solids list (up to 10 ppm cyanide levels). The remaining drums had HCN levels above the action level of 4.7 ppm in the breathing zones once the drums were opened, so the crew segregated the remaining drums, and will complete transfer of these drums at a later time in level B PPE with the high cyanide solids (solids with cyanide levels above 10 ppm). Two full roll-off dumpsters containing cut empty drums were removed from the site and transferred for disposal at Michigan Disposal Waste Treatment located at 49350 North I-94 Service Drive, Belleville, Michigan, 48111. One empty roll-off dumpster was delivered.

11/19/2015 - The chemist conducted bucket bulking tests. The chemist generated 2 new lists, each with cyanide containing alkaline solids, and the crew began bulking the materials. One list contained 10 drums and vats with cyanide levels up to 3 ppm, and the second list contained 24 drums and vats with cyanide levels up to 10 ppm. The crew also continued cutting empty poly drums and loading them into the roll-off dumpster, and sweeping the floors in the central staging areas. The crew also received 20 cubic yard boxes, which will be used for bulking solids.

11/20/2015 –The chemist conducted bucket bulking tests, and the crew continued bulking the cyanide solids. The crew also cleaned and secured the site for a one week shut down.

From 11/21-29/2015, no site work occurred. 24 hour site security was in place.

11/30/2015 – Site personnel remobilized after shutdown. The ERRS crew continued consolidation of low level cyanide solids (1-3 ppm cyanide levels) from the bulking list presented by the ERRS chemist on 11-19-15 that contained 13 drums and 9 vats. ERRS technicians completed the transfer of liquid and solid waste material from vat 020 (3 chambers with an estimated volume of 1,115 gallons) to 3 DOT-shippable poly totes. Additionally, the crew continued to cut non-DOT shippable poly drums in half and into manageable pieces prior to being transferred into a roll-off dumpster.

12/01/2015 – ERRS crew transferred liquid waste material (chromic acid) from vat 057 into a 55-gallon drum and began the transfer of medium level cyanide solids and liquids (3-10 ppm cyanide levels) from vat 016 that consists of 3 narrow chambers with an estimated 1,115 gallons. Due to liquid/sludge consistency of vat 016, the waste material could not be pumped out and the crew had to manually transfer the material via 5-gallon buckets. The crew continued to cut non-DOT shippable poly drums in half and into manageable pieces prior to being transferred into a roll-off dumpster. The crew constructed a new transfer pad within northern portion of site interior and identifies, stages and consolidates acetic acid solutions group containers (pH 1-3). The crew completes the consolidation of 10 containers with a pH of 1.

12/02/2015 – The crew completed the transfer of medium level cyanide from vat 016 including residual liquid material solidified with inert material. Crew completed the consolidation of the remaining acetic acid solutions (pH 2 & 3) provided by the chemist on 12-01-15 and transferred the waste material into one 55- drum. Additionally, the crew identified, staged and consolidated 14 drums containing high level cyanide solids (10 - 30 ppm) into cubic yard boxes.

12/03/2015 – The crew completed the removal and transfer of high level cyanide solids (11 total identified drums) within the eastern portion of the building interior in level B PPE based on previous HCN air monitoring levels associated with this specific area. The crew utilized a mini excavator and manual shoveling to separate deteriorated drums from their contents and transfer the material into cubic yard boxes. HCN readings in the vicinity of the excavator ranged from 0-18 ppm while direct readings from the area containing the drums and material placed in the cubic yard boxes 'maxed' out the multiRAE HCN sensor at 49.9 ppm, meaning the levels were somewhere above this level. A total of 7 cubic yard boxes were filled with the high level cyanide solids. Additionally, the application and removal of 'green sweep' was conducted within the eastern perimeter area that contained the high level cyanide solids.

The crew also began the transfer of high level cyanide solids from vat 008 (estimated 500 gallons) via manual shoveling and by the use of a jack hammer to loosen the consolidated material. Based on air monitoring levels in and around vat 008, level C PPE was utilized during this operation.

The OSC attended a meeting today at the County Administration building. In attendance were the County Treasurer, Administrator, Sheriff, the Michigan Department of Environmental Quality and the County's environmental contractor. The meeting centered on the status of the two Michner Plating Facility cleanups and next steps going forward once the Time-Critical Actions are completed.

12/04/2015 – The crew completed the removal of high level cyanide solids from vat 008, transferred metal debris from the eastern portion of the building interior that was associated with removal activities conducted on 12-03-15 and consolidated 5 medium level cyanide solid containers (alkaline solid cyanide). The ERRS chemist provided a flammable mixture bulking list with 24 containers to be consolidated. The crew identified and staged 13 of the 24 containers to be consolidated during the next operational period on 12-07-15. One 20 cubic yard roll-off dumpster containing cut empty drums was transported off site and disposed at Michigan Disposal Waste Treatment located at 49350 North I-94 Service Drive, Belleville, Michigan, 48111. ERRS received a shipment of DOT shippable drums and two empty 20 yard roll-off dumpsters were also delivered and the crew began transferring spent contractor bags containing PPE throughout the afternoon

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

Date	Waste stream	Medium	Quantity	units	Manifest Number	Treatment	Disposal
11/18/2015	RCRA empty containers & debris	Solid	20	cubic yards	015269770	NA	Michigan Disposal Waste Treatment
11/18/2015	RCRA empty containers & debris	Solid	20	cubic yards	015269771	NA	Michigan Disposal Waste Treatment
12/4/2015	RCRA empty containers & debris	Solid	20	cubic yards	015269767	NA	Michigan Disposal Waste Treatment

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

- 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

Additional budget is required to complete the Time-Critical Response Actions and has been requested and is within the Action Memorandum Ceiling. The OSC is focusing on re-packaging the on site wastes to stabilize the site prior to mid-December, so that the site may be demobilized to await the additional funds. It is anticipated that once funding is in place, the site will be remobilized in February to complete the removal action.

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

No Unified Command. This is a Time-Critical Response directed by EPA, not an ICS incident.

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: 1
ERRS: 8

5. Definition of Terms

No information available at this time.

6. Additional sources of information**7. Situational Reference Materials**

No information available at this time.