

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #11  
Progress  
Michner Plating - Mechanic Street Site  
C57C  
Jackson, MI  
Latitude: 42.2541975 Longitude: -84.4060903

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**From:** Jeffrey Kimble, OSC

**Date:** 12/28/2015

**Reporting Period:** 12/5/2015-12/21/2015

## 1. Introduction

### 1.1 Background

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

#### 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

On 12/5/2015 and 12/6/2015, no site work occurred. 24-hour security was onsite.

12/7/15 – The crew began waste bulking of the flammable mixtures identified by the chemist on 12/4/2015. During waste bulking of the flammable materials, volatile organic compounds (VOCs) were detected in the breathing zone above the site Action Level of 100 parts per million (ppm) for the flammable waste streams. Therefore, the crew upgraded to Level B PPE during waste bulking of the materials. The crew also collected 3 samples from a cubic yard box containing bulked materials with high cyanide levels (10-30ppm). The three samples were collected from the top, middle, and bottom of the cubic yard box. The chemist conducted bucket tests to determine the efficacy of neutralizing the high cyanide levels using bleach additives. The crew also continued loading bags with used PPE and sampling supplies into the roll-off dumpster.

12/8/15 – The crew completed waste bulking of the flammable mixtures. The chemist generated three new lists of containers with acidic solids, which included a total of 15 containers. The crew completed waste bulking of all the materials except vat V006. The crew also gathered empty containers and dip baskets from the southern building, and continued cutting empty containers and loading them into the roll-off dumpster. One roll-off dumpster containing cut empty drums and used PPE and sampling supplies was removed from the site and transported for disposal at Michigan Disposal Waste Treatment located at 49350 North I-94 Service Drive, Belleville, Michigan, 48111.

12/9/15 – The crew completed transferring the acidic solid wastes from vat V006. The chemist generated a list of 40 containers with cyanide containing neutral solids, and the crew began waste bulking the materials. One roll-off dumpster containing cut empty drums was removed from the site and transported for disposal at Michigan Disposal Waste Treatment in Belleville, Michigan. The crew also began cleaning, sealing, labeling, and staging shippable containers with bulked waste which will be transported offsite on 12/10/15.

12/10/15 – The crew continued waste bulking the cyanide containing neutral solids. Two loads were transported offsite for disposal. 30 drums, 4 totes, and 6 cubic yard boxes containing waste corrosive materials were transported for disposal at Michigan Disposal Waste Treatment in Belleville, Michigan; 1 drum and 2 totes containing waste corrosive liquids were transported for disposal at EQ Detroit located at 1923 Fredrick Street, Detroit, Michigan, 48211; and 38 drums and 3 totes containing waste flammable liquids were transported for disposal at Petro-Chem Processing Group located at 421 Lycaste Street, Detroit, Michigan, 48214. The crew also continued cutting and loading empty drums into the roll-off dumpster. Crews also moved waste containers out of the southern staging area in the building, and cordoned off the area with caution tape due to a potentially failing roof in the area. The crew will not enter the area until a building inspector or civil engineer confirms the stability and safety of the roof.

12/11/15 – The crew completed waste bulking of the cyanide containing neutral solids except tank T012 (a 2,000-gallon metal AST containing sand) and vat V051H (a 600-gallon vat located underneath a catwalk). The chemist generated a list of 35 containers with non-cyanide containing alkaline liquids and solids, and the crew began waste bulking the materials. The crew also continued cutting and loading empty drums into the roll off dumpster.

On 12/12/2015 and 12/13/2015, no site work occurred. 24-hour security was onsite.

12/14/2015 – The crew continued waste bulking of the non-cyanide containing alkaline liquids and solids. The crew also continued cutting empty poly drums and flattening empty steel drums, and loading them into the roll off dumpster. One load was transported offsite for disposal. 9 drums and 19 cubic yard boxes containing non-hazardous alkaline solids were transported for disposal at EQ Detroit in Detroit, Michigan.

12/15/2015 – The crew completed waste bulking of the 35 containers of non-cyanide alkaline liquids and solids. The chemist generated a list of 16 containers with combustible solids, and the crew completed waste bulking the materials. The crew also continued cutting empty poly drums and flattening empty steel drums, and loading them into the roll off dumpster.

12/16/2015 – The chemist generated a list of 6 containers with strong acids, and the crew completed waste bulking the materials. Several of the strong acids created heavy acid fumes, therefore, the crew completed the waste bulking activities in Level B PPE. The crew also continued cutting empty poly drums and flattening empty steel drums, and loading them into the roll off dumpster. The crew also began cleaning, sealing, labeling, and staging shippable containers with bulked waste which will be transported offsite on 12/17/15.

12/17/2015 – The chemist generated a list of 13 containers with oxidizing solids and sludge, and the crew began waste bulking the materials. One roll-off dumpster containing cut and flattened empty drums was removed from the site and transported for disposal at Michigan Disposal Waste Treatment in Belleville, Michigan. Also, one load of shippable containers was transported offsite for disposal. 6 drums containing corrosive liquids, and 13 drums and 14 cubic yard boxes containing non-hazardous alkaline solids were transported for disposal at EQ Detroit in Detroit, Michigan. The crew also began decontaminating equipment. 6 members of the City of Jackson Fire Department were onsite, and toured the outside of the site buildings. The Fire Department members observed the areas where the crew will secure the building.

12/18/2015 – The chemist added 12 containers with oxidizing solids and sludge to the previous list, and the crew continued waste bulking the materials. The crew also continued decontaminating equipment and staging the equipment for demobilization. The chemist conducted bucket bulking tests, and submitted 8 samples for laboratory analysis.

On 12/19/2015 and 12/20/2015, no site work occurred. 24-hour security was onsite. 5 crew members and 2 USCG personnel demobilized on 12/19/15. Additional equipment was also demobilized.

12/21/2015 – The crew completed waste bulking of the oxidizing solids and sludge. The crew also continued decontaminating equipment, covering waste materials in the building with poly sheeting, and securing the site buildings in preparation for the holiday break. The crew staged the skidsteer, mini-excavator, and generators outside the building to be demobilized.

**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 PRP'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
12/8/2015	RCRA empty containers & debris	Solid	20	cubic yards	015268769	NA	Michigan Disposal Waste Treatment
12/9/2015	RCRA empty containers & debris	Solid	20	cubic yards	015269768	NA	Michigan Disposal Waste Treatment
12/10/2015	Corrosive Liquid	Liquid	1045	gallons	014463806	NA	Michigan Disposal Waste Treatment
12/10/2015	Corrosive Liquid	Liquid	555	gallons	014463807	NA	EQ Detroit
12/10/2015	Corrosive Liquid	Liquid	18,105	gallons	014463808	NA	Michigan Disposal Waste Treatment
12/10/2015	Flammable Liquid	Liquid	2,340	gallons	014463810	NA	Petro-Chem Processing
12/10/2015	Flammable Liquid	Liquid	500	gallons	014463811	NA	Petro-Chem Processing
12/14/2015	Non-Hazardous Solids	Solid	33,000	gallons	014463819	NA	EQ Detroit
12/17/2015	RCRA empty containers & debris	Solid	20	cubic yards	015516432	NA	Michigan Disposal Waste Treatment
12/17/2015	Corrosive Liquid	Liquid	330	gallons	014463864	NA	EQ Detroit
12/17/2015	Non-Hazardous Alkaline Solids	Solid	31,000	pounds	014463864	NA	EQ Detroit

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

No further site work will be initiated until February 2016. The OSC is waiting incremental funding for the site which is not yet available.

**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. At this time, the OSC is awaiting allocation of the additional funds for the project.

**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.