

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #13
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

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From: Jeffrey Kimble, OSC

Date: 3/15/2016

Reporting Period:

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

02/29/2016 – The crew swept and shoveled debris from the floors and trenches in the northern and central portions of the building and loaded the debris into cubic yard boxes. The chemist generated a list of 48 containers with mineral acids, and the crew staged the containers in the northern room for waste bulking at a later date. The crew also identified one 55-gallon drum which was not previously sampled. The crew collected a sample from the drum, and the chemist completed hazard characterization of the material.

3/1/2016 – The crew collected samples from pits P002 through P005 and P015 for waste disposal purposes, and the chemist conducted bucket compatibility tests of the materials. The crew also began transferring the liquid from tank T009 to pits P001 and P003. The crew cleared debris (pallets, pallets, trash, etc.) from the northern portion of the building near the bay door where a new roll-off dumpster will be staged. During delivery of the roll-off dumpster, the sub-contracted truck driver fell on a patch of ice in the northern portion of the site. The driver was taken to the emergency room to be monitored for signs of a concussion. The OSC called a safety stand down on site to review hazard weather conditions and future steps to further safeguard against additional incidents occurring. The crew will take corrective actions to ensure that all areas that will potentially be traveled by crew members or visitors to the site are plowed and free of ice during snow and/or ice events.

3/2/2016 – The crew continued transferring the liquid from tank T001 to pits P001 and P003. During the transfer, one crew member slipped into the pit when a metal grate he was standing on gave way. The crew member was removed from the pit and decontaminated on site. The crew member did not sustain any injuries. The OSC again called a safety stand down and no additional site work was completed prior to implementation of corrective measures as a result of the incident. The crew was sent home for the remainder of the day so that safety adjustments to the site could be ratified and implemented. The roll-off dumpster was delivered after the stop of work activities, and was staged in the northern portion of the building.

3/3/2016 – ERRS submitted a site HASP amendment with corrective actions in response to the previous day's incident, which was reviewed by EPA, START, and USCG. Corrective actions will include: increased training for all employees in fall protection; installing restrictive barriers surrounding the pits; and using harnesses connected to approved beams for any work near the pits or catwalks regardless of flooring type. The crew completed transferring the contents of tank T009 into pit P003. The crew also began waste bulking 23 containers with hazardous neutral solids in the roll-off dumpster.

3/4/2016 – The crew finished bulking the hazardous neutral solids, and began waste bulking liquids from the 48 containers with mineral acids which were previously staged. The crew also cleared debris from the northern and eastern portions of the building, where USCG members will set up equipment to pump out pits P001-P005.

On 3/5/2016 and 3/6/2016, no site work occurred. 24-hour security was onsite.

3/7/2016 – The crew continued waste bulking liquids from the containers with mineral acids. The crew also began pouring sample jars that were used for hazard categorization into the appropriate pits with compatible materials. 1 additional crew member mobilized to the site.

3/8/2016 – The crew completed waste bulking the liquid portions of the mineral acid containers, and began waste bulking the sludge or solids from the containers. 5 USCG personnel mobilized to the site with pumping equipment, and began setting up and staging equipment to pump out pits P001-P005.

3/9/2016 – The crew completed waste bulking the sludge and solids from the mineral acid containers. The chemist generated a list with 8 additional containers with neutral solids, and the crew loaded and mixed the materials in the roll-off dumpster. The chemist also identified 21 containers with cyanide pillows/bricks, hydrogen peroxide, reactive sulfides, or metal slag, and the crew separately overpacked the containers. 2 loads were pumped out of pit P003 with non-hazardous pit water into vacuum trucks, and were transported for disposal at Disposal and Recycling Technologies, Inc. located at 8847 Lyndon Street, Detroit, Michigan. 1 frac tank was mobilized to the site.

3/10/2016 – The chemist generated three lists with a total of 37 containers with chromic acid, and the crew began waste bulking the materials. 1 additional load was pumped out of pits P002, P003, and P004 with non-hazardous pit water into a vacuum truck, and was transported for disposal at Disposal and Recycling Technologies, Inc.; 2 loads with non-RCRA, non-DOT regulated tank water were pumped out of pit 5 into vacuum trucks, and were transported for disposal at EQ Detroit, located at 1923 Fredrick Street, Detroit, Michigan; and 1 load with hazardous waste liquid was pumped out of pit P001 into a vacuum truck, and was transported for disposal at Michigan Disposal Waste Treatment located at 49350 North I-94 Service Drive, Belleville, Michigan.

3/11/2016 – The crew continued waste bulking the chromic acid containers. The chemist conducted bucket compatibility tests of the waste materials. USCG personnel were onsite packing and decontaminating pumping equipment. 7 USCG personnel and 3 crew members demobilized from the 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 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	Hazardous Waste Solid	Solid	20	cubic yards	015269769	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	18105	Gallons	014463808	NA	Michigan Disposal Waste Treatment
12/10/2015	Flammable Liquid	Liquid	2340	Gallons	014463810	NA	Petro-Chem Processing Group
12/10/2015	Flammable Liquid	Liquid	500	Gallons	014463811	NA	Petro-Chem Processing Group
12/14/2015	Non Haz solids	Solid	33000	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	NonHazardous Alkaline Solids	Solid	30100	Pounds	014463864	NA	EQ Detroit
2/26/2016	Non-hazardous neutral solids	solid	12	Tons	022360	NA	C&C landfill
3/9/2016	Non-hazardous pit water	Liquid	5000	Gallons	39161	NA	Disposal and Recycling Technologies, Inc.
3/9/2016	Non-hazardous pit water	Liquid	5000	Gallons	39162	NA	Disposal and Recycling Technologies, Inc.
3/10/2016	Non-RCRA, Non-DOT Regulated Tank Water	Liquid	4652	Gallons	014994712	NA	EQ Detroit
3/10/2016	Non-hazardous pit water	Liquid	3300	Gallons	31016	NA	Disposal and Recycling Technologies, Inc.
3/10/2016	Non-RCRA, Non-DOT Regulated Tank Water	Liquid	5000	Gallons	014994732	NA	EQ Detroit
3/10/2016	Hazardous Waste Liquid	Liquid	4236	Gallons	014994713	NA	Michigan Disposal Waste Treatment

2.2 Planning Section

2.2.1 Anticipated Activities

Complete disposal and demobilize project.

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

Based on the difficulty encountered in managing and bulking the site waste to date, there will be little funding to address additional and potential sources of waste encountered on site during the cleanup process. The OSC has coordinate with the State of Michigan and EPA Remedial Branch to initiate further investigations into the extensive contaminated building structures and floors and potential underground hazards likely to exist at the site once the Time-critical cleanup is finished.

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

2.5.1 Safety Officer

The OSC has coordinated EPA response to 2 safety incidents on site with the ERRS contractor to the Region 5 H&S Officer.

2.5.2 Liaison Officer

2.5.3 Information Officer

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: 7
START: 1
ERRS: 9

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.