

**United States Environmental Protection Agency
Region IX
POLLUTION REPORT**

Date: Wednesday, May 10, 2006

From: Craig Benson

To: Francisco Arcaute, USEPA
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John Jaros, USEPA
George Baker, DTSC
Craig Benson,
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Andrew Helmlinger, USEPA
Steven John, USEPA
Rob Wise, USEPA
Jim Hanson, USEPA
Rob Wienke, LA County Sanitation District
Charles McLaughlin, DTSC

Subject: Initiation of Action
Graybill Metal Polishing, Inc.
1245 East Florence Ave., Los Angeles, CA
Latitude: 33.9753000
Longitude: -118.2525000

POLREP No.:	1	Site #:	09NZ
Reporting Period:	05/09/06	D.O. #:	02-016-9074
Start Date:	5/9/2006	Response Authority:	CERCLA
Mob Date:	5/9/2006	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	CAN000908399	Contract #	
RCRIS ID #:			

Site Description

The Graybill Metal Polishing, Inc., site (Graybill) is located in a commercial/residential area at 1245 East Florence Avenue in Los Angeles, California, geographic coordinates of -118.25247 longitude and 33.97598 latitude. Until recently, the facility conducted copper cyanide, nickel and chrome plating and buffing and polishing operations. The site is approximately 11,000 ft² with an 8,000 ft² building divided into a polishing and buffing area (east) and plating area (west). The back lot (north side of parcel) houses an additional chrome and nickel strip line, a storage shed and is generally congested with empty tanks, containers, used equipment, automobiles and other debris. The back lot is surrounded by a fence that is bordered on the north by residences, including homes and apartments, and on the east by a convenience store parking lot. The facility is attached to the west by a business operating a metal anodizing operation.

According to an Inspection Report documenting a joint California Department of Toxic Substances Control (DTSC) and local Certified Unified Program Agency (CUPA - Los Angeles County Fire Department) compliance inspection conducted on October 18, 2005, the facility has been the subject of numerous past inspections, Notices of Violation, and Enforcement Orders issued by DTSC, the CUPA and the Los Angeles County Sanitation Districts (LACSD). Numerous violations of State Hazardous Waste Control Law and LACSD discharge violations have been documented.

In April 2006, the State Attorney Generals Office delivered a Unilateral Cleanup Order to the business owner/operators and property owner. Continued facility non-compliance led to a DTSC request for EPA site evaluation assistance. A joint DTSC and EPA inspection was conducted on May 9, 2006. During this inspection, EPA OSCs C. Benson and J. Musante and START conducted a preliminary waste inventory, collected samples, reviewed past inspection results with DTSC personnel and documented site conditions.

Based on the observed site conditions, evidence of a continued release of hazardous materials, the unsecured nature of the facility, and statements by facility representatives, OSC Benson initiated an immediate stabilization and removal action through exercise of warrant authority on May 9, 2006.

Current Activities

5/9/06

Joint DTSC/EPA inspection attended by EPA OSCs Benson and Musante, two START and DTSC representatives R. Brushia, Ph.D Hazardous Substance Scientist, D. Rasmussen, Supervising Hazardous Substance Scientist, Emergency Response Unit, and G. Baker, ER Coordinator.

The team was met on-site by D. Howes and R. Vollaerts with Heger Realty Corp. (representing the Van Bergen Family Trust, property owners). Also on-site were J. Graybill, Facility Manager and several facility staff. Signed access agreements were obtained from Messrs. Graybill and Howes. No conditions were set on access and sample collection and split samples were declined.

The inspection team witnessed a large quantity of liquid and solid hazardous wastestreams including, caustic, acidic, and cyanide and metal bearing plating process solutions in unsecured plating vats, product and waste containers and waste treatment sumps and clarifiers throughout the property. Polishing and buffing dust, containing hazardous waste determining concentrations of cyanide, chromium, copper nickel, lead, selenium and zinc (DTSC analysis) was also scattered throughout the facility and on the ground outside the facility. There is no barrier to prohibit dust dispersion into surrounding residential lots. Accumulated chemical waste was evident throughout the plating and collection sump and clarifier areas and covered the containment flooring, wooden walkways, and vats. Numerous RCRA Marked drums of hazardous waste (no accumulation start date) and containers of process chemicals were present inside the building and back lot area. The building itself was found in very poor condition, with shattered window glass and torn metal siding allowing for direct access and contaminant migration to the exterior.

DTSC analytical results from several vat, sludge, and grinding dust samples collected during the October 2005 inspection consistently revealed elevated and hazardous waste determining concentrations of cyanide and numerous metals including, chromium, hexavalent chromium, cadmium, copper, nickel, lead, zinc, and selenium. The START has prepared a preliminary inventory and collected pH readings from open containers. Readings indicated that there were acidic and caustic solutions open to the air inside and outside the building. In addition, the following six samples were collected under an approved Emergency QASP for purposes of obtaining data for use in a pending Action Memorandum.

ID Tank Analysis

GB-01 Nickel solution: Total Metals, STLC Metals

GB-03 Copper Cyanide solution Total Metals, CN

GB-07 Chromic acid solution: Total Metals, TCLP Metals, Hex Chrome

GB-14 Nickel stripper solution: (sulfuric acid) Total Metals, pH

GB-15 Nickel Stripper solution: Total Metals, pH

GB-D Polishing Dust: Total Metals, TCLP Metals

OSC Benson provided a verbal general notice of CERCLA liability to Mr. Graybill (on-site) and Ralph Van Bergen Jr. representing the property owner (telephonically). Mr. Graybill represented that they have no plans for cleanup, no funds and he would be leaving the property today (thereby effectively leaving the facility unmanaged). Mr. Van Bergen represented that he would continue to work with Heger Realty Corp. and Mr. Howes in the hopes of finding a buyer or cleanup firm willing to assume work within the current constraints.

The DTSC Criminal Investigation Bureau (CIB) has an outstanding criminal investigation/case regarding this site. OSC Benson provided specifics of the current EPA action to CIB Agent J. Rykoff and will continue coordination with CIB as needed. The balance of the day was used to perform a walk-through and scoping of the first stabilization phase of response activities with the ERRS Response Manager and START Project Manager, arrange for site security and coordinate activities with EPA's assigned Civil Investigator and Attorney Advisor.

Planned Removal Actions

Phased removal operations, beginning with site stabilization and wastestream consolidation began on 5/9/06.

Next Steps

- Continue full ERRS mobilization, site set-up.
- Preparation of Consolidated HASP, Wastestream Bulking and Consolidation Plan, and Air Surveillance QASP for corrosive and cyanide wastestream pumping activities.
- HazCat of all bulk and non-bulk hazardous materials containers.
- Receipt of START analytical data, continue profiling, re-containerization and removal of all above ground

wastestreams. Liquid wastestreams considered first, followed by plating sludges, buffing and polishing dust and then contaminated structural material/soils.

- Action Memorandum draft and issuance of CERCLA 106 Order to PRPs

Key Issues

Information contained in DTSC's most recent Compliance Inspection report suggests that there may be significant subsurface contamination in the soils underlying the site. After the above-ground wastes have been removed, allowing for a more comprehensive inspection, a shallow subsurface sampling, analysis and removal phase may be warranted.

Surficial soil sampling in residential yards adjoining the site.

No current media interest.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$0.00	\$200,000.00	100.00%
RST/START	\$20,000.00	\$0.00	\$20,000.00	100.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$10,000.00	\$0.00	\$10,000.00	100.00%
Total Site Costs	\$230,000.00	\$0.00	\$230,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/graybill

POLREP #1 Last Updated 5/10/2006