United States Environmental Protection Agency
Region IX
POLLUTION REPORT

Date: Monday, May 15, 2006
From: Craig Benson

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

POLREP No.:	2	**Site #:**	09NZ
Reporting Period:	5/10/06 - 5/15/06	**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
See POLREP No. 1

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.

Formal EPA involvement with Graybill began on May 9, 2006 with the issuance of a general notice of CERCLA liability to the property owner and facility operator. 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. A transition from EPA stabilization to PRP full-scale site cleanup was initiated on May 15, 2006. All future phases of activity are expected to be completed by the PRP contractor under the terms of a CERCLA 106 Order.

Current Activities
POLREP No. 1 documents site activities on 5/9/06.

5/10/06 - Personnel: EPA OSC - 2, START - 2, ERRS – 7.

A. ERRS continued to mobilize equipment and supplies for site stabilization and wastestream consolidation and re-packaging efforts. Privacy screen tarps installed along perimeter fencing and exclusion, contamination reduction and support zones established. ERRS assisted START throughout the day with field chemistry and wastestream bulking and segregation planning. Acidic wastestream pumping and re-containerization was initiated.

B. START continued with field HazCat analysis, health and safety oversight and initiated container inventory spreadsheets.

C. Site visit by F. Arcaute, EPA Field Office Press Officer and D. Hostetler, DTSC Tiered Permitting and Corrective Action Branch. Mr. Hostetler himself as a DTSC project point of contact and will work will EPA to ensure post EPA removal project transition to State agencies (as needed). The site was also visited by N. Frumkin, Removal Manager for Enviroserv, Inc. Mr. Frumkin indicated that the Family Trust that owns the property contacted Enviroserv and set up a meeting later in the week to discuss possible a possible transition from EPA emergency stabilization to PRP full-scale site cleanup. Mr. Frumkin was provided a site tour and was encouraged to advise the OSC immediately concerning any contractual relationship developed.

5/11/06 - Personnel: EPA OSC - 2, START - 2, ERRS – 7.

A. ERRS completed the pumping and re-containerization of the acidic wastestreams and started and completed the pumping and re-containerization (Level B) of the caustic and cyanide bearing wastestreams. ERRS began to collect and re-pack hazardous polishing and buffing dust, dispersed throughout the facility, and prepared the buffing and polishing room of the facility for use as a temporary staging area for all re-containerized wastes.

B. START continued with field HazCat analysis, health and safety oversight and container inventory efforts. With ERRS, the START began a site-wide container sweep, staging all identified containers for visual inspection, inventorying, field testing, re-packaging and relocation to the temporary staging area.

5/12/06 - Personnel: EPA OSC - 1, START - 2, ERRS – 7.

A. ERRS completed solidification and stabilization of all remaining residual liquids in process vats and containers and used a vacuum truck to transfer approximately 2,000 gallons of facility sump and clarifier system liquids to a Baker tank. All identified re-containerized wastes were moved to the temporary staging area and all non-hazardous materials and debris were removed to designated areas.

B. START completed all field HazCat analysis and continued with health and safety oversight. Complete large and small container inventories, with corresponding descriptions, field data and cross-references to laboratory generated data were also completed. START collected four additional samples of select sludge and process area samples for off-site laboratory analysis (results pending). The data from these samples and the six EPA/START samples collected on 5/9/06 will be merged with existing DTSC data in a sample data summary spreadsheet.

C. OSC Benson was contacted by the property owner representative (Trustee) and was informed that an agreement had been reached with Enviroserv for the completion of site activities. This arrangement was also communicated via e-mail correspondence to OSC Benson and the EPA Attorney from the Attorney representing the property owner Trust. Mr. Frumkin arrived on-site for a full project scoping meeting with OSC Benson. The specifics of a PRP workplan for all subsequent project phases were communicated and Mr. Frumkin stated he would deliver the workplan on 5/15/06. Arrangements were made to meet Mr. Frumkin on-site on 5/15/06. 24-hr. site security continued through the weekend.

5/15/06 - Personnel: EPA OSC - 1, START - 1, ERRS – 1.

A. OSC Benson, the ERSS Response Manager and the START project Manager met with Mr. Frumkin on-site. OSC Benson reviewed the Enviroserv workplan and HASP and minor corrections were agreed to by Mr. Frumkin. Daily and weekly reporting procedures were also established between EPA/START and Enviroserv. Enviroserv will begin their efforts by arranging for transportation and disposal of re-containerized wastestreams followed by final characterization and disposal of accumulated sludges, polishing dust, process containers, boardwalks and building material. Off-site and subsurface characterization will be conducted under a separate Sampling and Analysis Plan to be submitted to EPA for approval.

B. The following day, 5/16/06, was set as the beginning of Enviroserv workplan implementation and the transition day from emergency stabilization activities to full-scale PRP site cleanup actions.

C. ERRS off-site.

Planned Removal Actions

Effective 5/16/06, all further site removal activity is expected to be completed under the terms under the terms of an EPA approved workplan and CERCLA 106 Order elements (pending).

Next Steps

- Effective 5/16/06, all further site removal activity is expected to be completed under the terms under the terms of an EPA approved workplan and CERCLA 106 Order elements (pending).
- Receipt of EPA/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.
- All EPA/START analytical data will be provided to Enviroserv, when received, to assist with project waste profiling and site health and safety needs.
- Action Memorandum approval and issuance of CERCLA 106 Order.
- Local distribution of EPA Fact Sheet.

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. A stand-alone Sampling and Analysis Plan will be prepared by Enviroserv to address subsurface issues in a future project phase.

Surficial soil sampling in residential yards adjoining the site.

A record of project wastestreams, shipment dates and receiving facilities will be provided in the documents link at www.epaosc.net/graybill.

response.epa.gov/graybill