United States Environmental Protection Agency
Region IX
POLLUTION REPORT

Date: Friday, May 26, 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.:	3	**Site #:**	09NZ
Reporting Period:	5/16/06 - 5/25/06	**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.
POLREP No. 2 documents site activities from 5/10/06 – 5/15/06

5/16/06 – 5/17/06

A. Transition from EPA emergency stabilization to PRP funded removal continued. Receipt of EPA/START analytical data for 10 samples of various plating solutions, sludges and building materials collected during the previous weeks emergency stabilization phase. EPA data confirmed the presence of state and federal hazardous waste determining levels of antimony, cadmium, chromium, hexavalent chromium copper, lead, nickel and/or zinc in site wastestreams and RCRA corrosive and reactive (cyanide) characteristic wastes on-site.

B. The EPA data was merged existing State data and provided to the PRP response contractor (Enviroserv) for use in waste profiling and disposal facility selection.

C. On 5/17/06 EPA issued a Press Release and conducted an on-site media availability event. The event was attended by several news outlets and questions were addressed by EPA LA Field Office Manager S. John, EPA Press Officer F. Arcaute, and OSC Benson.

5/18/06

A. Enviroserv continued to prepare EPA re-containerized solutions (drums and 250 gallon totes) for shipment and began to segregate, inventory and lab pack smaller chemical containers. A preliminary

survey of potential asbestos containing materials (ACM) were evaluated for future sampling. Approximately 2,500 gallons of sulfuric, chromic and nitric acid solutions were manifested off-site. An up-to-date project Waste Tracking Log with manifest and disposal facility information for project wastestreams can be found in the documents link at www.epaosc.net/graybill.

B. Los Angeles County Sanitation District representatives on-site to evaluate facility clarifier and discharge system.

5/19/06

A. Enviroserv began removal of plating vats/process tanks and contaminated catwalks and debris. Scrap metal and out-of-service tanks were staged for pressure washing and eventual scrapping. Three 40 yd3 bins of "F006" RCRA coded waste were manifested off-site. Plating room pipe insulation samples were delivered to State certified laboratory for ACM analysis.

B. Rain water run-off contingency plan prepared in anticipation of forecasted heavy weekend rains.

5/21/06

A. Sandbags were placed in rainwater drainage pathways on-site (precautionary).

5/22/06

A. Enviroserv completed the removal of plating vats/process tanks and contaminated catwalks and debris and began to break-up and remove contaminated concrete berms around the interior and exterior plating lines. Dust suppression and continuous air monitoring employed for all demolition activities. General consolidation, profiling, bulking and lab-packing operations continue for general debris scattered throughout facility and small volume chemical stock and gas cylinders. Approximately 1,325 gallons of cyanide solutions, 140 yd3 of "F006" RCRA coded sludge, debris and concrete and one sodium cyanide lab-pack were manifested off-site.

5/23/06

A. OSC Benson on-site to meet with Enviroserv Response Manager and representatives of Ceres Associates (Ceres). Ceres has been contracted by the PRP to prepare and implement the Sampling and Analysis Plan (SAP) for the subsurface evaluation phase. OSC Benson provided specific guidelines for the content of the SAP and overall data use objectives. The SAP will be submitted as a stand-alone document for EPA approval.

B. Enviroserv continued the removal of contaminated concrete berms around the interior and exterior plating lines and removed the contaminated wood divider separating the polishing and plating rooms and the roof from the exterior nickel plating line canopy. Dust suppression and continuous air monitoring employed for all demolition activities. . Approximately 80 yd3 of "F006" RCRA coded sludge, debris and concrete, eight lab-packs (flammables, corrosives, and aerosols) and one propane cylinder were manifested off-site.

C. Enviroserve removed about 15 linear feet of non-friable asbestos pipe insulation (based on previous analytical). Use of an outside abatement contractor was not required, per State asbestos removal regulations (California Business & professional Code Division 3, Chapter 9, Article 11, Section 7058.5). All ACM work was performed utilizing wet work practices with attendant air monitoring and required respiratory and dermal protection.

5/24/06

A. The polishing and buffing room was prepared for pressure wash & collection of contaminated dusts by sweeping, capping inlet/outlet on clarifiers, and covering windows. General site cleanup activities and removal of 6,000 pounds of non-hazardous metal debris for recycling.

5/25/06

A. The polishing and buffing room was pressure washed and all generated liquids were consolidated with previously re-containerized clarifier/sump system liquids in Baker tank. Collection of dust and grindings throughout facility continued. Approximately 40 yd3 of "F006" RCRA coded debris, 10 gas cylinders (oxygen, acetylene, and propane) and 2,500 gallons of chrome contaminated wastewater were manifested off-site.

B. All identified above-ground bulk and non-bulk wastestreams have now been removed. Enviroserv began partial demobilization (security remains) pending preparation and approval of SAP for Phase II shallow subsurface evaluation phase.

Planned Removal Actions

PRP continuation of site removal activity is expected to be completed under the terms of a CERCLA 106 Order.

Next Steps

- Action Memorandum approval and issuance of CERCLA 106 Order.
- Re-mobilization pending approval of Phase II SAP. EPA may remove soils to a depth of five feet bgs. EPA will not investigate or respond to deep soil or groundwater contamination at the Site.

Key Issues

- Fact Sheets are available on-site. To date, there has been limited community, local residence interest.
- START team oversight assistance is provided for each day of site activities.
- A multi-agency coordination group meeting will be organized in the near future to review site issues and evaluate future remediation needs.

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

Disposition of Wastes

See Waste Tracking Log in the documents link.

response.epa.gov/graybill