

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

Date: Thursday, August 17, 2006

From: Craig Benson

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Subject: Initiation of Action
Atlas Metals
10019 S. Alameda St., Los Angeles, CA
Latitude: 33.9464000
Longitude: -118.2297000

POLREP No.:	1	Site #:	09NM
Reporting Period:	8/3/06 - 8/16/06	D.O. #:	
Start Date:	8/3/2006	Response Authority:	CERCLA
Mob Date:	8/14/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	CAN000908308	Contract #	
RCRIS ID #:			

Site Description

The Atlas Iron and Metal Co., Inc site (Atlas) is located at 10019 South Alameda Street in the City of Los Angeles, California. Atlas is bordered to the north by LEX-West, a Lexington Steel Corporation, to the south by David Starr Jordan High School facilities and to the west by the Jordan High School sports field. Alameda Street and the Alameda corridor border Atlas facility to the east. The Los Angeles River is located 3.5 miles southeast of Atlas.

Atlas is an approximately three acre active metal recycling facility where scrap metal is stored and prepared for reuse by cutting, welding and sorting operations. The type of scrap handled at the facility includes ferrous (iron and steel) scrap industrial equipment, appliances, non-ferrous scrap metal other than steel (such as aluminum, copper, lead, zinc), auto, radiators, stainless steel, aluminum cans, brass plumbing fixtures, electric motors, and insulated wire. The site has operated as a metal recycling facility since approximately 1949.

In October, 2005 the California Department of Toxic Substances Control (DTSC), submitted a formal Request for Federal Action to EPA to address two waste piles present at the facility. The waste piles are located on the western most end of the facility along the boundary with the Jordan High School sports field. The larger pile is approximately 140 feet long by 40 feet wide by 5 feet deep and contains roughly 1,050 cubic yards (yd3) of waste material. The smaller pile is approximately 36 feet long by 39 feet wide by 7 feet high and contains roughly 365 yd3 of waste material. According to facility representatives and State records, the piles consist of sweepings, debris and cuttings associated with site operations for more than 40 years.

EPA efforts through 2005 involved an initial Site walk and records review of available documentation regarding the Site and numerous local and State agency environmental investigations associated with the

waste piles.

In February, 2006 EPA implemented a Sampling and Analysis Plan (SAP) to fully characterize the waste piles and augment existing State data. The EPA analytical results confirmed that the Atlas waste piles, consisting of approximately 1,400 yd³ of soil and debris, are characteristic hazardous wastes due to the concentrations of copper, lead and zinc in excess of State and/or Resource Conservation and Recovery Act (RCRA) hazardous waste concentration thresholds. In addition, the waste piles contain elevated levels of PCBs, arsenic, chromium and benzo(a)pyrene.

Subsequent negotiations between EPA, DTSC and the PRP resulted in an EPA-approved PRP Removal Action Workplan and Health and Safety Plan for the excavation and disposal of the waste piles and any associated areas of soil contamination. The PRP removal team mobilized on August 14, 2006. Field operations are expected to conclude at the end of August or early September 2006.

Current Activities

All removal activities are being conducted by the PRP under the terms of an EPA-approved Removal Action Workplan (RAP) and Site Health and Safety Plan (HASP). EPA approved the RAP on 8/3/06 and the HASP on 8/7/06. The following organizations are participating in the removal action:

- EPA - Providing primary oversight of RAP implementation.
- DTSC - Providing oversight of RAP implementation and lead for community involvement coordination.
- SOS - Prime PRP contractor responsible for overall site removal activities. In addition they are collecting perimeter air samples for lead contamination.
- ERRG - SOS subcontractor; responsible for sorting through waste piles to separate ferrous metals and waste, loading of wastes for off site disposal, and exclusion zone air monitoring for dust emissions.
- GENI - ERRG subcontractor; responsible for personnel safety monitoring.

8/14/06

Personnel On-Site: OSC Jason Musante, 1-START, DTSC Ruth Williams-Moorehead and Brian Wu, Atlas Counsel Ross Hirsch, 2-SOS, 5-ERRG, 2-GENI.

A. PRP contractor mobilization and site set-up.

B. OSC Musante met with Pat Schanen and Christer Loftenius, Los Angeles Unified School District (LAUSD), to confirm the scope and schedule of activities. Mr. Schanen stated that the Jordan High School summer session will end on 8/17/06 as opposed to 8/11/06 previously reported by LAUSD. OSC Musante explained that the first several days of activity would be low impact (no waste loading). In coordination with LAUSD, DTSC Schools Division representative Joe Hwang and OSC Musante, barrier tape was hung on the Jordan High School campus to close off access to area adjacent to the west side of the Atlas property. LAUSD coordinated with school personnel to direct students not to enter the area and monitor student compliance.

C. ERRG personnel uncovered and began knocking down the smaller waste pile to segregate any large recyclable ferrous metal objects. Staging areas were created for the main soil/debris waste stockpile (for future loading), ferrous metal objects, and used tires. All exclusion zone work was performed in Level C. Dust suppression was performed using water mist and other control measures identified in the RAP.

D. ERRG conducted air monitoring for particulates using an MIE pDR at several locations along the exclusion zone perimeter. An action level of 0.42 mg/m³ was used to adjust exclusion zone boundaries, based on pDR measurements. GENI fitted three ERRG personnel with personal air samplers to measure lead exposure in the exclusion zone. Samples collected from two heavy equipment operators and one field technician were submitted for laboratory analysis of lead concentrations. SOS collected high volume air samples at three fixed perimeter locations to the southwest, east, and north of the waste piles; these samples were submitted for laboratory analysis of lead concentrations.

8/15/06

Personnel On-Site: OSC Musante, 1-START, DTSC R. Williams-Moorehead and B. Wu, 2-SOS, 5-ERRG, 1-GENI.

A. ERRG completed processing of the small pile. A small amount of ferrous metal objects were recovered for potential recycling. ERRG began processing of the large pile, working from the south to the north. All work in the exclusion zone was performed in level C PPE. Dust suppression was performed using water mist and other control measures identified in the RAP.

B. ERRG and SOS continued air monitoring/sampling activities as described on 8/14/06. GENI reports results from personnel air samples collected on 8/14/06 indicated no concentrations of lead above the OSHA PEL of 0.1 mg/m³.

C. START conducted air monitoring using an MIE pDR positioned in the southwest corner of the site to monitor particulate concentrations in the direction of Jordan High School. The PDR was operated for 8 hours with a final TWA of 0.034 mg/m³.

8/16/06

Personnel On-Site: OSC Musante, 1-START, 2-SOS, 6-ERRG, 1-GENI.

A. ERRG continued processing of the large pile. Work in the exclusion zone was performed in level C PPE until 1200 hours; based on personnel air sample data GENI recommended a downgrade to modified level D PPE. OSC Musante approved the downgrade. Dust suppression was performed using water mist and other control measures identified in the RAP.

B. ERRG and SOS continued air monitoring/sampling activities as described on 8/14/06. Results from personnel air samples collected by GENI on 8/15/06 indicated no concentrations of lead above the OSHA PEL of 0.1 mg/m³.

C. START continued air monitoring for particulates at the southwest corner of the site, in the direction of Jordan High School. The PDR was operated for 8 hours with a final TWA of 0.051mg/m³.

D. At 1400 hours, GENI safety officer stops work due to strong organic odor reported by workers in the exclusion zone. No visible apparent source; SOS informed Atlas facility personnel and Atlas operation in the adjacent area were stopped. Atlas facility personnel stated no gas or utility lines are in the area of the large pile. OSC Musante requested that air monitoring for VOCs be conducted. SOS, ERRG, and GENI did not have instrumentation available to perform monitoring, therefore OSC Musante stopped work activities for the day.

Planned Removal Actions

In Progress

Next Steps

- Complete processing of large pile.
- Load and transport stockpiled waste for disposal.
- Confirmation sampling of subsurface beneath the waste piles.

Key Issues

- SOS/ERRG to provide VOCs monitoring instrumentation.
- EPA receipt of waste profile and LDR documentation for the Chemical Waste Management Kettleman Hills Facility.
- EPA receipt of SOS air sampling data for review.
- Due to the minimal amount of large, ferrous metal objects discovered, segregation has been performed using a track-hoe with thumb attachment instead of the electromagnetic separation described in the RAP.
- EPA and DTSC working together on community involvement. DTSC has informed EPA that their strategy will be to communicate the success and completion through post-cleanup notification (targeting those groups/individuals) they have worked with for over 3 years on the issue.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* 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/atlas

POLREP #1 Last Updated 8/17/2006