

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

**Date:** Tuesday, September 5, 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

<b>POLREP No.:</b>	7	<b>Site #:</b>	09NZ
<b>Reporting Period:</b>	8/16/06 - 9/5/06	<b>D.O. #:</b>	02-016-9074
<b>Start Date:</b>	5/9/2006	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	5/9/2006	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	CAN000908399	<b>Contract #</b>	
<b>RCRIS ID #:</b>			

**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. Phase I cleanup operations, involving the identification, bulking and removal of all identified above-ground bulk and non-bulk wastestreams, was completed on May 25, 2006.

Phase II cleanup operations involving shallow subsurface soil and building component characterization and removal is currently underway and will continue to be led by the PRP contractors 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

POLREP No. 3 documents site activities from 5/16/06 – 5/25/06

POLREP No. 4 documents site activities from 5/26/06 – 7/10/06

POLREP No. 5 documents site activities from 7/11/06 – 8/4/06

POLREP No. 6 documents site activities from 8/5/06 – 8/15/06

8/17/06

A. OSC Benson on-site. Enviroserv (PRP removal contractor) and Ceres Associates (PRP technical contractor) work to load, manifest and transport the final six loads (128 yd3) of stockpiled metals contaminated soil to the receiving facility. 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](http://www.epaosc.net/graybill).

B. Site clean-up and equipment demobilization pending receipt of cleanup confirmation analytical results. 24-hour site security retained.

8/23/06

A. EPA receipt (OSC Musante) of confirmation soil sampling results for AOC 1 (plating room) excavation area samples and second set of AOC 4 (polishing room) excavation area samples. OSC Musante approved the Enviroserv backfilling plan for both open excavations (scheduled to begin 8/29/06).

B. The contaminated soils excavation in AOC 4 to approximately 1.5 – 2.0 feet bgs and AOC 1 to approximately 6.0 – 7.0 feet bgs was successful in removing highly contaminated shallow soils in the designated grids. Four confirmation soil samples (CSS-3, CSS-7A, CSS-10, and CSS-15) continued to reveal elevated levels of chrome, nickel, zinc, and/or copper. These sample point about building structural footings and any further excavation is not possible without a building demolition effort. Final project reporting will clearly delineate the excavation areas, sample data and remaining grids/areas requiring possible further excavation.

8/29/06

A. OSC Benson on-site. Enviroserv set-up for excavation backfilling. Geofabric liner was placed in both excavation pits (AOC 1 and AOC 4). AOC 1 pit was backfilled with ¾” crushed rock to approximately 2.5 feet bgs and covered with another layer of Geofabric in preparation for final cover of washed fill sand.

8/30/06

A. OSC Benson on-site. Enviroserv filled AOC 1 to grade with washed fill sand and filled AOC 4 directly with the sand. Due to probable future building demolition and change of use, compaction of the backfill was not required.

B. OSC Benson advised Los Angeles County Sanitation Districts (LACSD) inspector B. Barnum of the impending completion of EPA ordered activities on-site. Mr. Barnum confirmed that LACSD was satisfied with the previous clarifier “closure activities” which consisted of plug installations at the sample box outfall and at the outfall from the exterior clarifier.

C. OSC Benson met DTSC Tired Permitting Corrective Action Branch representative D. Hostetler on-site for a project debrief and EPA-DTSC transition discussion. Mr. Hostetler is the identified Graybill DTSC point-of-contact and will be provided copies of all PRP and EPA final project reporting. According to Enviroserv, Ceres Associates is already working on behalf of the PRP to investigate and close facility permits with the necessary local agencies.

8/31/06

A. Enviroserv completed all backfilling tasks, pressure washed exterior areas and the north driveway and demobilized all personnel and equipment.

9/5/06

A. A thin strip of metals contaminated soil in the residential yard at 1238 71st Street, which abuts the Graybill facility, was identified in the original characterization sampling. The PRP Attorney and Enviroserv have presented the data to the property owner (Julia Lee) and continue to attempt to secure access to remove the surface soil and replace with clean fill. OSC Benson contacted PRP attorney M. Stiles regarding progress in securing access to complete this final step. Mr. Stiles reported that no progress has been made in securing access despite numerous attempts. According to Enviroserv representatives and Mr. Stiles, Ms. Lee is elderly, appears confused and frequently forgets previous conversations. Mr. Stiles agreed to continue to seek resolution on the matter.

#### **Next Steps**

- Resolution of the 1238 71st Street issue.
- Delivery of all project reporting to DTSC Hostetler and DTSC CIB J. Rykoff.

#### **Key Issues**

- START team oversight assistance was provided for each day of site activities.
- Pursuant to the terms of a written agreement between the residential property owner and the PRP Attorney, Enviroserv will remove the contaminated soil and backfill the identified off-site soil area.

