

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

Date: Tuesday, February 5, 2008

From: Subash Patel

To: Jim McGuire, ERRB

Chris Masterson, EPA

Subject: ER REMOVAL ACTION COMPLETE

MOBILE AMERICAN BUMPER PLATING SITE

1654 Navco Road, Mobile, AL

Latitude: 30.6338510

Longitude: -88.1058080

POLREP No.:	2	Site #:	04GL
Reporting Period:	02/05/08	D.O. #:	
Start Date:	1/22/2008	Response Authority:	CERCLA
Mob Date:	1/23/2008	Response Type:	Emergency
Demob Date:	2/1/2008	NPL Status:	Non NPL
Completion Date:	2/1/2008	Incident Category:	Removal Action
CERCLIS ID #:	ALD008214090	Contract #	
RCRIS ID #:			

Site Description

On 01/22/08, at the request of the City of Mobile Alabama, OSC Ullock met at the former American Bumper, aka "AMPS", 1654 NAVCO Rd. site with representatives of the City of Mobile's, Environmental Compliance group, the ADEM-MOBILE-ER, STATE OSC, START, approximately 15 members of a local, Concerned Citizen's Action Group and a local television station. The purpose of the visit was to attempt to assess the presence of suspected hazardous materials. This facility is reported to have operated over a 40 year span.

Upon this initial assessment, OSC Ullock initiated an Emergency Response Removal Action after discovering approximately 35-45 abandoned 55 gallon drums containing low pH nickel plating solution, several deteriorated paper drums actively releasing NaOH solids onto rain runoff, numerous 1 and 5 gallon totes, vats of low pH plating wastes, and a former QA/QC laboratory containing hundreds of small containers of chemical reagents and other hazardous substances. Some of these containers were incompatible with one another (strong acids and bases) and were improperly staged next to each other.

The facility is abandoned and in severe, structural disrepair. The various chemicals, containers and some vats were completely exposed to the external elements. Several containers were severely deteriorated thus releasing their contents directly into the surrounding ground and environment. Evidence of hazardous substances exiting the primary building via rain runoff was observed. Evidence of recent, ongoing trespassing and vagrancy was documented at this Site.

Current Activities

On the afternoon of 01/22/08, OSC Ullock filed a Pollution Report with the National Response Center. Early on the morning of 01/23/08, OSC Ullock met the ADEM, START, and ERRS at the Site to begin securing operations at the Site. Activities over the next 10 days included the repairing and installation of fencing including lockable gates in an effort to adequately address the trespassing and uncontrolled access to the Site. The newly installed fence was posted with warning signs.

On 01/25/08 OSC Ullock attempted to issue a Letter of Federal Interest and gain signed access from the former owner/operator. This effort was unsuccessful.

An EPA Attorney was assigned to the Site and has assisted with the issuance of a Letter of Federal Interest to this former owner/operator.

A Civil Investigator has been assigned to the Site and is scheduled to arrive on site the week of February 11th to begin the PRP search and investigation.

Planned Removal Actions

All originally discovered containers (actual # of containers is available) were sampled and "hazcatted" for field hazard characterization. All sampled containers (drums, totes, vats, etc.) have been photo-documented. Field notes were taken of the approximate volume and physical condition of each container.

Upon completion of the field characterization, approximately 10 samples were selected based on HAZCAT results. Two of these field screened waste samples detected the presence of Cyanide and several samples detected the presence of chromic acid. Three additional sediment samples associated with two former "drying beds" were also collected for RCRA metals analysis. The 13 total samples have been sent to an appropriate laboratory for definitive, qualitative and quantitative analysis. These analysis are forthcoming.

All drums, totes, and other containers including specific vats were properly pumped out, segregated and secured either by overpacking into new drums or consolidating like materials into suitable drums.

All containers were removed from their original, exposed location within the primary plating building and moved into a cleaner, weatherproof and secure building located onsite. These materials will be disposed of at a later date to be determined.

Next Steps

If the Civil Investigation reveals a viable PRP, it is anticipated that US EPA may enter into a clean agreement/order with the PRP. If a viable PRP is not clearly identified then it is anticipated that US EPA-ERRB will conduct a thorough, Removal Site Assessment possibly in conjunction with the ADEM's, Site Assessment Section. Significant sub-surface soil contamination is suspected at this former electroplating facility.

Key Issues

- 1) The Site has moderate to high, local media interest.
- 2) The Site is located beside a predominantly african-american neighborhood which appears to be economically distressed.
- 3)The Site is of strong concern to a local concerned citizens environmental action group.
- 4) Site ownership and periods of operation are not clearly evident.
- 5) Site has confusing regulatory history between the DOJ, the ADEM and the US EPA's, RCRA and Removal Programs. This history spans almost 20 years and needs to be evaluated and addressed.
- 6)Valuable inventory consisting of hundreds of chrome plated bumpers and parts remain within the on-site warehouse. The ownership and disposition of these materials needs to be quickly determined.
- 7) Site is expected to be costly with extensive sub-surface contamination possibly involving hexavalent chrome. Subsequent Removal Site Assessment activities should be conducted ASAP.

response.epa.gov/americanplating