

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Michner Plating - Mechanic Street Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Michner Plating - Mechanic Street Site
C57C
Jackson, MI
Latitude: 42.2541975 Longitude: -84.4060903

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From: Jeffrey Kimble, OSC
Date: 10/1/2015
Reporting Period: 09/21/2015 to 09/27/2015

1. Introduction

1.1 Background

Site Number:	C57C	Contract Number:	
D.O. Number:		Action Memo Date:	7/2/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/24/2015	Start Date:	8/24/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action.

1.1.2 Site Description

Michner Plating Mechanic Street (Site) is a former plating shop which operated from the 1930s until 2007. Michner Plating also operated a separate facility on Angling Road in Jackson, Michigan, until May 2015. The Site contains approximately 1,100 drums, vats, totes, and other containers. Labels and sample analytical results indicate the potential presence of cyanide, zinc cyanide, nickel chloride, chromic acid, hydrogen peroxide, sulfuric acid, ignitable wastes, reactive wastes (including water reactive chemicals), and other chemicals.

1.1.2.1 Location

The Site is located at 520 North Mechanic Street in Jackson, Jackson County, Michigan, in a mixed commercial and residential area and is bound to the north by a commercial property, to the east by North Mechanic Street with residential dwellings and commercial properties beyond, to the south by East Trail Street with commercial properties beyond, and to the west by a railroad and the Grand River. The Site sits on roughly 4 acres, and contains four buildings totaling approximately 137,000 square feet.

1.1.2.2 Description of Threat

The Site contains approximately 1,100 drums, vats, totes, and other containers. Labels and sample analytical results indicate the potential presence of cyanide, zinc cyanide, nickel chloride, chromic acid, hydrogen peroxide, sulfuric acid, ignitable wastes, reactive wastes (including water reactive chemicals), and other chemicals.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA previously conducted an assessment and determined a Time-Critical Action was warranted. See Sitrep 1 for additional information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA began a Time-Critical action consisting of the removal of over 1,100 containers of hazardous waste on August 24, 2015.

2.1.2 Response Actions to Date

9/21/2015 – Crews collected samples from containers 851 through 864. Crews also began labeling and collecting samples from vats, tanks, and pits in the warehouse, which were labeled as V001, V002, V003, etc.; T001, T002, T003, etc.; and P001; P002, P003, etc. Samples were collected from vats V001 through V008, and tanks T001 through T007. Hazard categorization of samples continued. A State of Michigan Elevator Inspector inspected the elevator in the former Salco office space which stopped working. Salco is a welding business that was leasing part of the Michner facility and was active at the time the Michner properties were seized due to foreclosure. Salco was required to vacate the building. Salco only used 2 floors of the former Michner building, and Michner Plating had old waste containers abandoned on the other floors of the building. In order to remove these old waste containers from the building, EPA crews were utilizing a service elevator to bring the waste to the ground floor level so it could be moved to the staging area. The inspector determined the service elevator to be acceptable for use but required minor servicing by an elevator repair company. Crews gathered containers from the second floor of the office building and staged these containers near the elevator to be brought down once the elevator is repaired.

9/22/2015 - Crews collected samples from containers 865 through 880, and vats V009 through V022. Hazard categorization of samples continued. The elevator was repaired in the office building and was approved for use. Crews gathered containers from the second and third floors of the office building and moved them to the staging area in the warehouse building. Jackson Deputy Fire Chief David Wooden was onsite and discussed emergency planning with the EPA OSC.

9/23/2015 - Crews collected samples from containers 881 through 905, vats V024 through V037, and pit P015. Hazard categorization of samples continued. Bench scale compatibility testing of the on-site wastes was initiated. This bench scale testing is to ensure there are no incompatibilities in the waste streams that the on-site chemist has determined to be our waste bulking groups before large scale bulking is initiated. Crews gathered containers from the second and third floors of the office building and moved them in the staging area in the warehouse building. The skidsteer equipment was retrofitted to allow for use in Level B PPE by the operator.

9/24/2015 - Crews collected samples from containers 906 through 940, vats V041 through V050, pits P001 through P016, and T008. Hazard categorization of samples and bucket bulking compatibility tests continued. 124 deteriorated drums were moved from the central portion of the warehouse and staged on pallets on top of poly sheeting in the staging area. Approximately 15 gallons of unknown liquid from one of the drums spilled onto the concrete floor while moving the drum into the staging area. No evidence of a reaction was observed, and no elevated readings were detected with the air monitoring equipment. Crews used vermiculite powder and absorbent pads to soak up the recoverable liquid.

9/25/2015 – Crews collected samples from containers 941 through 980, vats V051A through V051K, and tanks T009-T010. Hazard categorization of samples and bucket tests continued. Crews also measured pits, vats, and tanks to determine the volume of materials contained in each. Fresh graffiti was observed on the western outer wall of the warehouse building. Local police were notified of the vandalism. A representative of the Jackson Police Department was onsite to view the location of the graffiti and they will conduct periodic checks of the area during non-working hours.

From 9/26-27/2015, no site work occurred. 24-hour security was on site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Michner Plating Company is the potentially responsible party (PRP), however, the company relinquished ownership of the property to the Jackson County Treasurer's Office due to tax reversion and bankruptcy. The removal action is a Fund Lead as a result of the RP's bankruptcy and inability to finance the cleanup.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Anticipated activities for the next reporting period include continuing to collect samples, performing hazard categorization of the samples collected from on-site containers, bucket compatibility tests for each waste bulking group, and the initiation of waste bulking.

2.2.1.1 Planned Response Activities

Inventory and perform hazard characterization on all substances contained in containers, drums, tanks and spilled material on the floor and in pits;

Investigate the potential for soil contamination on the property;

Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;

Dismantle and decontaminate process equipment, tanks and building components associated with the product process area, as necessary;

Remove from site and recycle or dispose of vats and waste containers and contaminated process equipment;

Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA approved disposal facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440);

Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps

Continue to perform the planned response actions until cleanup is complete.

2.2.2 Issues

No issues to report at this time.

2.3 Logistics Section

Site logistics are being managed by ERRS.

We are trying to establish a power drop from the power company to provide site power. We are currently operating off generators until this can be established.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Jackson County Treasurer's Office
City of Jackson Water Department

4. Personnel On Site

EPA: 2
USCG: 2
START: 2
ERRS: 10

5. Definition of Terms

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
EPA Environmental Protection Agency
ERRS Emergency and Rapid Response Service
MDEQ Michigan Department of Environmental Quality
mg/kg milligrams per kilograms
OSC On Scene Coordinator
PPE Personal Protective Equipment
RCRA Resource Conservation and Recovery Act
PRP Potentially Responsible Party
START Superfund Technical Assessment and Response Team
USCG United States Coast Guard

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.