

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Gretna Plating and Polishing - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #4**
Initial - Post Hurricane Ida
Gretna Plating and Polishing
A6LQ
Gretna, LA
Latitude: 29.9321865 Longitude: -90.0477758

To:
From: Philip Rouse, OSC
Date: 9/23/2021
Reporting Period: September 17th - 19th, 2021

1. Introduction

1.1 Background

Site Number:	A6LQ	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/19/2021	Start Date:	9/17/2021
Demob Date:	9/19/2021	Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA incident category: Other - abandoned electroplating facility

1.1.2 Site Description

The Site consists of the former Gretna Plating and Polishing Company (GPP) that was established in 1980 and operated as a decorative chrome and nickel electroplating facility until August 2015 when it experienced a fire and ceased operations. Following the 2015 fire, EPA responded to the incident and took measures to secure the Site. See previous POLREPs for details for actions taken and additional details about GPP operations.

The site features include:

- The former GPP operational area
- An area of undeveloped land

The GPP operational area encompasses an approximately 0.25 acres area and includes a 4,000 square feet (sqft) building and an adjacent 504 sqft building. The property's east side is covered by pavement and the west side of the property as undeveloped land. GPP utilized the building for its operations and consists of a prefabricated metal industrial manufacturing. The adjacent building was mainly used for storage and consists of a wooden barn type building. The main building is 40'x50'x12' with a second floor loft designated for storage.

1.1.2.1 Location

The site is located at 725 Carricox St., Gretna, Jefferson Parish, Louisiana within a residential area. The approximate center of the site is Latitude 29.932136° North and Longitude -90.047861° West.

1.1.2.2 Description of Threat

The Site poses an imminent threat to public health and the environment, which is associated with the former GPP electroplating operations and current state of the facility. The threats include:

- Access to the Site was essentially unrestricted.
- The facility is in poor to failing condition due to the former electroplating operations, damage caused by the 2015 fire, lack of upkeep, and storm impact including Hurricane Ida in 2021.
- The property has been abandoned and facility/building has been condemned by the City of Gretna,

LA.

- The facility houses numerous containers in good to failing condition that are associated with the former electroplating operations, which contain hazardous substances, contaminants, and/or pollutants,
- The facility is located in very close proximity, less than 10 feet, to residential homes within a residential community.
- The site's contaminants of concern are, but not limited to, heavy metals, bases, oxidizers, and other constituents associated with the electroplating process.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The assessment conducted following the 2015 response identified a release, as well as threat of release of hazardous substances, pollutants or contaminants at the GPP site as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. §302.4.

During the September 19th, 2021 site visit, the facility was found in failing condition, which is partly associated with impact by Hurricane Ida, as well as contained numerous containers within the damaged main building. The GPP facility sustained structural damage to the roof and walls caused by the fire, facility operations, and storm impact.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Beginning on August 3rd, 2015 EPA took Emergency Response Removal Actions to stabilize the Site following the 2015 fire incident. See previous POLREPs for details. Following these actions, the RP took responsibility for the clean-up under LDEQ oversight and EPA demobilized from the Site on August 9th, 2015; however, the RP deceased prior to completing clean-up.

Due to the lack of PRP, the City of Gretna began to take clean-up actions through a Brownfields grant, but before these actions could be completed the Site was impacted by Hurricane Ida in August 2021, which caused additional damage to the facility that resulted in, but not limited to, unrestricted access to the facility.

Due to the damage caused by Hurricane Ida, the City of Gretna requested EPA assistance to secure the Site.

On September 17th, 2021, the City of Gretna granted EPA written consent to access the property.

On September 19th, 2021, EPA along with ERRS and START contractors mobilized to the site to restrict access to the property. EPA restricted access to the site by erecting chain-link fencing along the north, west, and south property boundary, as well as covering exposed areas of the east side for the main building with plywood. The City of Gretna supplied a structural engineer to assess the building stability, whose evaluation stated the building was structurally sound and therefore the building was safe to enough to enter to remove containers without mechanical means. While onsite, air monitoring was conducted for particulates, chromic acid, hydrogen sulfide, and volatile organic compounds. Results indicated that hazardous emissions were not present during that time. In addition, pooled storm water within the facility was measured at a pH of 5. Due to the condition of the facility based on the structural engineer evaluation and lack of indications of an ongoing release, EPA demobilized from the site following restricting access with plans to take later actions to remove the abandoned containers offsite for disposal.

On Friday, October 1, 2021, the EPA team mobilized to the site to conduct waste profiling and prepare a waste removal strategy. The ERRS Transportation and Disposal (T&D) Coordinator for the site collected representative samples from containers onsite to gather information regarding compatibility and waste disposal options. Samples were submitted to a subcontracted laboratory to be analyzed for disposal parameters. Air monitoring conducted during removal operations indicated all parameters to be at background levels. All work was completed by the end of the workday and samples were shipped to the subcontracted laboratory.

On Thursday, October 7, 2021, the EPA team mobilized to the Gretna Plating and Polishing site to begin removal activities. Operations slated for this first stage of the removal included lab packing all containers less than 10-gallons, transportation and disposal of all lab packs, bulking all liquids from vats into 250-gallon tote tanks, placing all emptied vats into a roll-off box, staging all 55-gallon drums and any overpacks into a Conex box for temporary storage, and removing any solid wastes from the floor. The ERRS crew utilized 1 cubic yard, lined, corrugated boxes to package all containers less than 10-gallons. Materials were grouped with like/compatible constituents and adsorbent materials placed within the boxes to prevent leakage. Ten boxes were filled with small containers, sealed, manifested, and prepared for offsite transportation. Four 55-gallon salvage drums were filled with acidic materials, sealed, manifested, and prepared for offsite transportation. The contents of the two vats located outside of the main building were emptied into a 250-gallon tote tank. Approximately 100 gallons of material were transferred. Air monitoring conducted during removal operations indicated all parameters to be at background levels.

On Friday, October 8, 2021, the EPA team mobilized to the Gretna Plating and Polishing site to continue removal activities. Activities for the day included completing all lab pack activities, shipping all lab packs offsite for disposal, pump out contents of vats into 250-gallon tote tanks, place empty vats into a roll-off box, overpack and place 55-gallon drums in the Conex box, and secure the site. Crews determined that two additional tote tanks and one additional roll-off box would be required to complete the removal.

On Monday, October 11, 2021, the EPA team mobilized to the site to continue removal activities. Operations planned for the day included completing the removal of all liquid wastes from the facility, including liquids within vats, drums, and other containers. The ERRS crew also planned to complete removal of the vats once the liquid contents were containerized. Two additional tote tanks and one roll-off box were delivered to the site to accommodate waste removal. The crew utilized a pump to remove the liquid contents from the remaining vats and drums in the facility and placed the liquids into a 250-gallon tote tanks. Once the liquids had been removed from the vats, the crew removed them from the building and placed the vats into the roll-off boxes. All drummed waste and 250-gallon tote tanks were placed into the Conex box for storage until disposal manifests and transportation could be arranged and approved. One tote tank was stored in the building due to some off-gassing of acid vapors occurring. The ERRS RM monitored the tank throughout the day and determined by the next morning that the acids had been neutralized and no further reaction was ongoing. The lid was secured, and the tank left within the building until transportation and disposal was arranged. By the end of the day, all wastes had been containerized and removed from the facility, except for the one tote tank.

On Tuesday, October 26, 2021, ERRS and START remobilized to the site to address a leak, reported by a contractor with the City of Gretna, from one roll-off box and the Conex box. Crews mobilized to the site and isolated a leaking drum within the Conex box. The metal overpack drum leaked liquid contents due the incompatibility of the contents and the metal drum. The contents of the overpack were repackaged and secured within the Conex box. All spilled material was collected by the ERRS crew, solidified using adsorbents, and placed within an onsite roll-off box. The leaking roll-off box was due to the end door not being properly secured. The ERRS crew tightened the door latches and rechecked the integrity. Once all operations were completed and inspections of the affected area insured no further leakage or product could be released, personnel demobilized from the site.

On Thursday, November 4, 2021, ERRS, START, and EPA mobilized to the Gretna Plating and Polishing site to continue removal operations. The primary goal for the day was to transport all materials offsite for disposal. Crews prepared all the containerized waste for transportation and inspected the site to determine if any additional leaks or discharges had occurred since the last mobilization. No additional leaks were noted, and the crews focused on securing the roll-off boxes, totes, and drums for transport to the disposal facility. Throughout the day the crews transported two roll-off boxes, three 250-gallon tote tanks, and 27 drums to the disposal facility or to a staging yard.

On Monday, November 8, 2021, the EPA Team mobilized to the Gretna Plating and Polishing site to begin removal of contaminated debris and ash from the facility. To reduce fugitive dust and worker exposure, the team utilized a vacuum system and box to removal contaminated materials. The vacuum system was comprised of a trailer mounted motor and pump which pulled air through a cyclone vessel. The cyclone vessel contained approximately 32 dust filters which eliminated any fugitive emissions. The cyclone vessel was connected to a vacuum box via a six-inch flexible hose. A similar six-inch hose was connected to the opposite side of the vacuum box and provided the crew with approximately 60-80 feet of reach to collect contaminated debris and ash. Materials vacuumed up by the crew were deposited within the vacuum box. Large pieces of equipment or debris were removed from the area of operation and placed onto pallets which were stored in building 2. By the end of the day, the crew had completed removal of contaminated debris and ash from the main vat room.

On Tuesday, November 9, 2021, the EPA Team mobilized to the Gretna Plating and Polishing site to continue removal operations. The crew once again utilized the vacuum system to collect and containerize contaminated debris and ash from the facility floor. During the vacuuming operations, the crew discovered liquid contaminants within 5-gallon buckets that were buried beneath debris in the front portion of the building. The buckets were placed into polyethylene drums and secured onsite. The crew also began placing contaminated debris which could not be vacuumed (due to the size of the material) into the vacuum box, while the unit was powered down, via a hatch located on the top of the vessel. At the completion of the workday, the crew completed removal of ash and debris from the entire facility with the exception of the polishing room where the majority of fire damage occurred.

On Wednesday, November 10, 2021, the EPA Team mobilized to the site to resume contaminated debris and ash removal operations. Upon completion of the debris and ash removal, the crew began breaking down the vacuum cyclone, removing the dust filter sleeves and placing them within the vacuum box. During the day the City of Gretna Public Works installed a water meter at the location to provide the team with water access for pressure washing activities scheduled for November 11. The crew installed the correct fittings on the meter so that the pressure washer could be connected. By the end of the day, the entire floor of the building had been cleared of ash and debris.

On Thursday, November 11, 2021, the EPA Team mobilized to the site to conduct pressure washing of the floor and removal of the vacuum box. The crew modified the vacuum system from a dry recovery to wet recovery by removing the cyclone and installing a 250-gallon tote tank beneath the primary vacuum recovery vessel. Crews first lined the interior walls of the building with chemical adsorbent boom to prevent any residual contaminants from being washed outside of the building foundation. A surface-cleaning attachment, comprised of two rotary nozzles within a housing, was utilized to contain any overspray produced by the pressure washer. One crew member passed the surface cleaner over the floor, one member utilized the vacuum hose to remove and containerize the liquids, and two crew utilized brooms and squeegees to direct liquids to the vacuum hose. Liquids collected during the pressure washing operation were stored within the tote tank. Approximately 60 gallons of liquid were captured, sampled for waste profiling, then secured onsite. At the end of the work-day, all removal operations were completed.

On Wednesday, January 19, 2022, the EPA Team mobilized to the site to remove the remaining waste onsite for disposal. While onsite, ERRS conducted an inspection of the main structure and discussed options for demolition of the building with EPA. ERRS estimated that it would require approximately 3 to 4 weeks to complete demolition work. EPA and START also discussed options for conducting sampling of the concrete pad that sits under the old plating shop as well as the surround concrete pad outside the structure. After assessment activities were complete, all personnel demobilized from the site. Once all

remaining waste was transported offsite for disposal, this concluded the Emergency Response activities for the site.

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

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

- Secure the Site by removal of onsite waste

2.2.1.1 Planned Response Activities

- Remove abandoned onsite containers for offsite disposal
- Return Site to City of Gretna for further actions including demolishing of facility.

2.2.1.2 Next Steps

- Coordinate contract to remove onsite waste offsite for disposal.
- Coordinate actions with City of Gretna.

2.2.2 Issues

The facility is in a poor to failing state with abandoned containers within an area subject to tropical storms and hurricanes that could potentially further impact the facility and result in an uncontrolled release and impact adjacent residents.

2.3 Logistics Section

No information available at this time.

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

LDEQ

City of Gretna

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.