

FEDERAL ON-SCENE COORDINATOR'S AFTER ACTION REPORT
FOR THE
AMERICAN PLATING REMOVAL SITE
BALTIMORE, BALTIMORE COUNTY, MARYLAND

APRIL 15, 2016 THROUGH OCTOBER 18, 2016



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
PHILADELPHIA, PENNSYLVANIA

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

TABLE OF CONTENTS

I.	FOREWORD	III
II.	SUMMARY OF EVENTS	1
	A. SITE CONDITIONS AND BACKGROUND	1
	1. Initial Situation.....	1
	2. Site Location	2
	B. EFFORTS TO NOTIFY AND COMPEL POTENTIALLY RESPONSIBLE PARTIES TO RESPOND	2
III.	ORGANIZATION OF THE RESPONSE	2
	A. NAMES AND ADDRESSES	2
IV.	CHRONOLOGICAL NARRATIVE OF REMOVAL ACTIONS.....	3
	A. THREAT ABATEMENT ACTIONS.....	3
	B. TREATMENT, DISPOSAL, OR ALTERNATIVE TECHNOLOGY APPROACHES PURSUED	5
	C. DISPOSAL METHODS AND QUANTITIES REMOVED	5
V.	PUBLIC INFORMATION AND COMMUNITY RELATIONS ACTIVITIES	9
VI.	RESOURCES COMMITTED	9
	A. INITIAL FUNDING REQUEST	9
	B. ADDITIONAL FUNDING REQUEST.....	9
	C. ESTIMATED TOTAL COST SUMMARY	9
	1. Extramural Costs.....	9
	2. Intramural Costs.....	9
VII.	EFFECTIVENESS OF REMOVAL ACTIONS	10
	A. ACTIONS TAKEN BY POTENTIALLY RESPONSIBLE PARTIES	10
	B. ACTIONS TAKEN BY FEDERAL AGENCIES	10
	C. ACTIONS TAKEN BY STATE AND LOCAL AGENCIES	10
	D. ACTIONS TAKEN BY CONTRACTORS.....	11
VIII.	DIFFICULTIES	11
	A. ITEMS THAT AFFECTED THE REMOVAL ACTION	11
IX.	GLOSSARY OF ABBREVIATIONS AND DEFINITIONS.....	11

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

LIST OF APPENDICES

APPENDIX A FIGURES

Figure 1 Site Location

Figure 2 Site Layout

APPENDIX B FUNDING REQUEST DOCUMENTS

APPENDIX C PHOTOGRAPHIC DOCUMENTATION

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

REGION III

TDD No. W501-16-05-002

CERCLA REMOVAL ACTION

FACT SHEET

SITE:	American Plating Removal Site (the Site)
SIZE:	Facility: 32,000 square feet. Site ~ 2 acres
LOCATION:	Baltimore, Baltimore County, Maryland
APPROVAL DATE:	Original Funding Request May 19, 2016 Increase in Funding Request May 27, 2016 Increase in Funding Request July 2, 2016 Increase in Funding Request August 26, 2017
PROJECT DATES:	April 15, 2016 – October 18, 2016
DESCRIPTION:	The Site is a former electroplating facility that operated as a large quantity generator under the Resource Conservation and Recovery Act (RCRA). It stopped operating in 2014. The Site consists of a single building in a dilapidated condition located within a mixed commercial/industrial neighborhood. The building contained abandoned electroplating vats, numerous containers of electroplating solutions and materials, and two laboratory areas with a large number of small containers of various chemicals.
NATIONAL PRIORITIES LIST STATUS:	The American Plating Removal site is not on the National Priorities List (NPL).
HAZARDOUS MATERIALS:	The building located at the Site contained a multitude of hazardous chemicals, including but not limited to; caustic compounds, nitric, sulfuric, and hydrochloric acid, several oxidizing compounds, numerous small bottles of chemicals and more than 50 drums containing various cyanide compounds and electroplating chemicals. Additionally, there were several electroplating lines present with vats still containing hazardous liquids.
QUANTITIES REMOVED:	Under this removal action, approximately 48,352 gallons, 156 cubic yards, 88 drums, and 35 totes of hazardous waste were transported off-site for disposal or treatment.
ON-SCENE COORDINATOR:	Gregory Ham

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

REMOVAL CONTRACTOR:	Environmental Restoration (ER) was the primary removal contractor.
PROJECT COSTS:	\$ 1,452,340
PROJECT CEILING:	\$ 1,989,500

I. FOREWORD

As mandated by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Title 40 of the *Code of Federal Regulations* (CFR), Part 300, the On-Scene Coordinator (OSC) is required to provide coordinated federal response capability at the scene of an unplanned or sudden release of oil or hazardous substance that poses a threat to the public welfare or the environment. In addition, the provisions of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), promote a coordinated federal, state, and local response to mitigate situations at hazardous waste sites that pose an imminent and substantial threat to public health and/or the environment.

The conditions at the American Plating Removal site presented an imminent and substantial threat to human health and the environment because of the potential release of a hazardous substance to the environment, thereby providing a legal basis for federal response activities. The provisions of the NCP, Section 300.415 were implemented by U.S. Environmental Protection Agency (EPA) Region III of Philadelphia, Pennsylvania.

The OSC would like to thank all agencies and individuals who provided valuable assistance and expertise to ensure the successful completion of this cleanup effort.

Gregory Ham
On-Scene Coordinator
U.S. EPA Region III
Philadelphia, Pennsylvania

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

II. SUMMARY OF EVENTS

This report discusses the removal action performed at the American Removal Site (the Site) located in Baltimore City, Baltimore County, Maryland, from April 15, 2016 through October 18, 2016.

A. SITE CONDITIONS AND BACKGROUND

1. Initial Situation

On April 14, 2016, representatives of the Maryland Department of the Environment (MDE) conducted an inspection of the facility. Based on that inspection, MDE requested assistance from EPA. On May 3, 2016 an OSC inspected the facility with inspectors from the Baltimore City Housing Department. The building was observed to be in very poor condition with a leaky roof, sagging beams, electricity only in parts of the building, and no water service. Many drums and totes of material were found throughout the building, some of which were in poor condition. Some fiber drums were stored in areas where stormwater from a leaking roof fell over them causing the drums to split. There were vats in the former electroplating area still full of liquids with labels warning of hazards. There were large numbers of containers located throughout the building that were staged next to incompatible materials and did not allow for adequate accessibility.

On May, 18 2016 the OSC returned to the Site with members of the START team to conduct sampling of the materials inside the building. The Baltimore City Housing Department inspectors were there, along with members of the Baltimore City Fire Department. After an inspection of the building and its contents, the City Housing Department posted a Condemnation Order on the Building. The Baltimore City Fire Department initiated the unified command structure and acquired command of the on-site operations. The Baltimore City Police Department provided 24-hour security services for the Site. On May 19, 2016, the OSC issued a special bulletin initiating a Removal Action at the site.

Over 1100 containers of chemicals were located throughout the building. Many of these were in their original containers, but were not stored in secure conditions. Hazardous substances on-site included cyanide compounds (zinc, potassium, copper, nickel, and sodium), sodium hydroxide, and acids (sulfuric, hydrochloric, nitric, and phosphoric). There were many drums labeled corrosives and a large tank half full of 50% sodium hydroxide according to the label. There were many drums with toxic and or/poison labels. There were vats from the former electroplating lines that still contained electroplating solutions, including acids and two with cyanide. There were two rooms of laboratory chemicals, including a large variety of acids and other hazardous substances. Many of these chemicals are hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C 9601(14), including among others, phosphoric acid, ferric chloride, and sodium hydroxide, which are listed in 40 C.F.R. 302.4. There are a number of commercial operations nearby, including a food manufacturing operation that employs over 100 people that is separated from the Site by a 12-foot alley between the buildings. The Amtrak main northeast corridor tracks run about 100 feet behind the building. As detailed above there are both acids and cyanide compounds stored in containers of questionable integrity. Acid and cyanide when mixed together form hydrogen cyanide gas, which is extremely toxic as well as very explosive. In the event of a fire or release of cyanide gas, a large number of people could have been affected by the plume or by runoff from stormwater.

Federal On-Scene Coordinator's After Action Report American Plating Removal Site

2. Site Location

The Site is located at 4004 East Monument Street, Baltimore, Baltimore City, Maryland. The site is located in a commercial/industrial area known as Orangeville Industrial Area in East Baltimore, approximately 4 miles east of downtown Baltimore. An Amtrak rail corridor runs approximately 100 feet to the north of the building. The geographical coordinates of the Site are 39° 17' 58.8804" (39.299689) north latitude and 76° 33' 52.4124" (-76.564559) west longitude as measured at the front of the building. The location of the Site is presented on Figure 1, Site Location. The layout of the Site is presented on Figure 2, Site Layout. Figures are presented at Appendix A. The building located at the Site is approximately 32,000 square feet in size and consists of an office, a laboratory, a manufacturing area, a former electroplating area, and a storage area. In general, the building is in poor condition.

III. ORGANIZATION OF THE RESPONSE

A. NAMES AND ADDRESSES

Agency	Contact	Brief Description of Duties
U.S. EPA Region 3 1650 Arch Street Philadelphia, PA 19103 (410) 305-2776	Gregory Ham (OSC)	OSCs coordinated all site removal activities from April 15, 2016 through October 18, 2016.
(410) 305-3027	Charlie Fitzsimmons (OSC)	
(215) 814-3229	Bonnie Gross, (Director)	Approved the funding request
Environmental Restoration LLC. 1666 Fabick Drive St. Louis, MO 63026 (314) 478-8227 (EPA Contractor)	Todd Conley (Response Manager)	Coordinated all site activities on behalf of emergency and rapid response services (ERRS) contractor
Weston Solutions 1400 Weston Way West Chester, PA 19382 (610) 209-1807 (EPA Contractor)	Craig Anderman (START Site Lead)	Superfund Technical Assessment and Response Team (START) representatives provided technical support to OSC, including environmental sampling, air monitoring, photographic documentation, and oversight.
US Ecology 251 East Front Street, Suite 400 Boise, ID 83702 (800) 590-5220 (a subcontractor to ERRS)	Ellen Lucas	Responsible for lab packing small containers of chemicals.
Elite People Security Incorporated 5602 Baltimore National Pike Suite 401 Catonsville MD, 21228	Bruce Jackson	Provided site security services.

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

Agency	Contact	Brief Description of Duties
(a subcontractor to WRS) (410) 500-6889		
Baltimore City Fire Department	Captain Richard Parker	Incident Commander.
Baltimore City Police Department	Captain Kevin Jones	Responsible for providing site security services.
Baltimore Housing Department	Shawn Kolego	Responsible for inspecting and condemning the building.

IV. CHRONOLOGICAL NARRATIVE OF REMOVAL ACTIONS

A. THREAT ABATEMENT ACTIONS

This removal was conducted under the authority of CERCLA. The purpose of the Removal Action was to reduce the mass of contaminants in the source area to limit the potential release of hazardous substances from the Site that presented an imminent and substantial endangerment to public health, welfare, or the environment.

EPA Region 3, supported by the START contractor conducted site assessment visits on May 3, 2016 and May 18, 2016. The OSC issued a special bulletin on May 19, 2016 and initiated a cleanup at the Site. The special bulletin was amended on May 27, 2016 to increase the project ceiling. On June 2, 2016, an Action Memorandum authorizing an increase in funding to continue the removal action activities was signed. See the attachments section of this After Action Report (AAR) for the Special Bulletins and Action Memorandum.

On May 19, 2016, START and ERRS contractors, Weston Solutions, Inc. (WESTON®) and Emergency Restoration LLC. (ER) respectively, mobilized to the Site. Between that time and May 31, 2016, removal work was focused on general site preparation, which included mobilization of equipment, establishing office trailers, establishing lighting inside the building, and installing a temporary security fence along the front of the on-site building. All easy access points of the building were secured by the installation of locks on doors and boarding up windows with plywood. Water that had collected from the sumps and pits inside the building was pumped into a storage tank located outside of the building. This water was sampled and did not meet the discharge limits for the City of Baltimore sanitary sewer; consequently, proper off-site disposal was arranged for its disposal.

Site stabilization operations began on June 1, 2016. Drums of questionable integrity were subsequently overpacked into recovery drums. All drums of cyanide salts in the building were overpacked and staged outside of the building. Stabilization operations continued throughout all of June 2016, with the ERRS contractors inventorying, restaging, and sampling all tanks, totes, drums, and all containers larger than 1 gallon. Hazard categorization tests were performed on samples from all containers, and chemicals were grouped together into waste streams for future disposal.

There were a number of tanks and drums containing water that the tenant had collected for operational process use because the water to the building had been shut off. After proper testing

Federal On-Scene Coordinator's After Action Report American Plating Removal Site

and approval from the City of Baltimore, approximately 7,955 gallons of this water was discharged to the City sanitary sewer.

The majority of the chemical bulking and staging phases of the project were conducted between June 21 and October 18, 2016. On June 21, 2016, two vats located in the building containing liquids with cyanide were pumped into totes for secure storage while awaiting approval for disposal. Additional smaller containers with cyanide were also bulked for disposal. A small number of containers of solids that had been mislabeled were identified as containing cyanide through hazardous categorization testing. These items were overpacked and secured for proper disposal with other cyanide-containing materials.

On June 2, 2016, the EPA command of site operations was officially transferred from the Baltimore City Fire Department to EPA. Elite People Security Incorporated provided site security services for the duration of the removal action.

On July 25, 2016, US Ecology, a subcontractor to ER, segregated the laboratory chemicals located inside the two laboratories in the building. The chemicals were lab packed by US Ecology and transported off-site for proper disposal. Approximately 1000 small containers were packed and transported off-site.

By August 8, all of the chemicals in the building had been categorized into waste streams. In all, 1132 samples were collected from containers, haz-catted, bulked with compatible wastes and staged for disposal. Bulking operations continued through August 2016. The following wastes and quantities were bulked into 250-gallon containers in preparation for off-site transport and proper disposal: caustics, 750 gallons; flammables, 500 gallons; cyanide wastes (from electroplating vats), 1,000 gallons; ammonia, 300 gallons; acids, 1,750 gallons, chromic acids, 1,250 gallons; and peroxides, 1,000 gallons. The neutral solids from the building were bulked in two open top tanks (approximately 10 feet in diameter, 4 feet high) in the rear yard of the facility located to the north of the building and placed in a hazardous waste roll-off container for disposal.

All of the containers outside in the rear yard of the building that contained liquid were sampled and analyzed. After approval by the City of Baltimore, the liquids (primarily rain water) were discharged to the City sanitary sewer. Several of the containers contained liquids which did not meet discharge limits. These liquids were bulked with other appropriate wastes for off-site disposal.

Due to the poor condition of the building (e.g., leaking roof) water pooled in the sumps and pits and on the floors inside the building after heavy rains. Throughout the removal action, this water was continually pumped from the building into two holding tanks to be transported off-site for disposal. Two shipments of sump water, totaling 9,600 gallons, were shipped off-site for proper disposal on July 6, 2016.

Empty drums and small containers were cut up and were placed in to a hazardous waste roll-off container for off-site disposal. All of the tanks and vats in the former water treatment area and the former electroplating line have been emptied, removed, and cut up and placed in a hazardous debris roll-off container for disposal.

On August 8, 2016 and August 18, 2016, roll-off containers of nonhazardous debris (e.g., empty containers, used personal protective equipment [PPE]) were shipped off-site for disposal. On

Federal On-Scene Coordinator's After Action Report American Plating Removal Site

August 17 and August 19, 2016 roll-off containers of hazardous debris (vat liners, contaminated wood and cinder blocks, and other contaminated debris) were shipped off-site for proper disposal. From August 10 to August 12, 2016, three loads of neutral liquids totaling 10,844 gallons were shipped off-site for proper disposal.

Air monitoring was conducted throughout the duration of the removal action operations. Six Area RAES were operated using the EPA Emergency Response Team (ERT) VIPER Data Management System to allow real-time data feedback monitoring, and evaluation. The Area RAES were placed in strategic locations in and around the building daily to continuously monitor concentrations of hydrogen cyanide, chlorine, volatiles, combustible gases, oxygen, and carbon monoxide. The air quality outside of the building was not impacted during removal operations. Dust/dirt samples were collected from the floors in the building to determine potential worker exposure to metals/cyanides. Airborne dust samples were also collected during work activities to determine airborne concentrations of particulates, metals, and cyanides to determine worker exposure and select the appropriate level of respiratory protection. During work activities, at a minimum level C PPE was used, and for some operations (primarily involving cyanides) level B was used.

B. TREATMENT, DISPOSAL METHODS AND QUANTITIES REMOVED

Table 1 provides detailed information regarding the materials that were disposed of from the American Plating Site. Actual manifests can be found in the Site file stored at EPA Region III Central File Room, Philadelphia, Pennsylvania.

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

Table 1 – Disposal Methods and Quantities Removed

Waste Stream	Quantity	Manifest or B.O.L. #	Approval #	Method of Disposal
Acetic Acid	3 Drums	015662527 JJK	I1611247DET	Incineration
Acid Liquid	8 Totes	015662527 JJK	I161129DET	Stabilization/Landfill Cell 5 East
Acid Solids	7 Drums	015662519 JJK	I165017EPA	Stabilization/Landfill Cell 15
Ammonia Liquid	1 Drum	015858193 JJK	WDV-2	Deep Well Injection
Ammonia Liquid	1 Tote	015858193 JJK	WDV-2	Deep Well Injection
Ammonia Solids	3 Drums	015662529 JJK	Seq-6 Product LJ	Stabilization/Landfill Cell 6
Caustic Liquid	4 Totes	015858192 JJK	WTI00-1	Waste Treatment Water
Caustic Liquid	5 Totes	015858191 JJK	WTI00-1	Waste Treatment Water
Caustic Solids	15 Drums	015662519 JJK	I165017EPA	Stabilization/Landfill Cell 15
Caustic Solids	11 Drums	015662521 JJK	I16122EPA	Stabilization/Landfill Cell N3300E3300
Chrome Acid Liquid	7 Totes	015662527 JJK	I161127DET	Stabilization/Landfill Cell 5 East
Chrome Acid Solids	1 Drum	015662521 JJK	I16122EPA	Disposal still pending
Copper CN	4 Drums	015615183JJK	WPS140363	Incineration
Cyanide Liquid	8 Totes	015858192 JJK	WTI00-6	Waste Treatment Water
Cyanide Solids	22 Drums	015858191 JJK	WTI00-7	Cyanide Destruction
Flam Liquid	2 Totes	015858193 JJK	FM1-3	Fuel Blending
Halogenated Solvent	1 Drum	015662529 JJK	Seq-7 Product FP	Incineration
Haz Waste Liq	4,987 Gal.	016033691JJK	F161173EPA	Waste Treatment/POTW Water
Haz Waste Liq	4,727 Gal.	015275506JJK	F161173EPA	Waste Treatment/POTW Water
Haz Waste Liq	3,273 Gal.	016033690JJK	F161173EPA	Waste Treatment/POTW Water
Haz Waste Liq	4,864 Gal.	015275687JJK	F161173EPA	Waste Treatment/POTW Water
Haz Waste Liq	4,872 Gal.	015275507JJK	F161173EPA	Waste Treatment/POTW Water

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

Haz Waste Liq	4,773 Gal.	016033783JJK	F161173EPA	Waste Water Treatment/POTW
Haz Waste Liq	4,980 Gal.	016512113 JJK	F161173EPA	Waste Water Treatment/POTW
Haz Waste Liq	4,147 Gal.	016512114 JJK	F161173EPA	Waste Water Treatment/POTW
Haz Waste Solid	16 CY	016033443JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	30 CY	016033559JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	30 CY	16033560JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	20 CY	016033561JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	20 CY	016033562JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	20 CY	016033563 JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Haz Waste Solid	20 CY	016033564 JJK	E161085MDI	Micro Encapsulation/Landfill Cells E&G
Hydrogen Peroxide	1 Drum	015858193 JJK	CDXGL-4	Other
Hydrogen Peroxide	1 Drum	015858193 JJK	CDXGL-4	Other
Lab Pack Material	4,265 lbs.	013642448/013642489JJK		incineration
Neutral Liquid	5,157 Gal.	009415944FLE	787469-00	Chemical Treatment
Neutral Liquid	3,233 Gal.	009415945FLE	787469-00	Chemical Treatment
Neutral Liquid	2,339 Gal.	009415946FLE	787469-00	Chemical Treatment
Neutral Solids	8.07 Tons	015858234 JJK	TLJ-8	Stabilization/Landfill Cell 16
Neutral Solids	10.94 Tons	015858235 JJK	TLJ-8	Stabilization/Landfill Cell 16
Oxidizer Solid	3 Drums	015662528 JJK	I161127MDI	Deactivation
Peroxide Liquids	1,000 Gal.	015662521 JJK	I16122EPA	Waste Water Treatment/POTW
Potassium CN	3 Drums	015615183JJK	WPS140362	Incineration
Radioactive Material/Lab Pack	3 lbs.	EPA/ABQ-16-0922		Recycled

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

Radioactive Material/Lab Pack	2 lbs.	EPA/ABQ-16-0922		Recycled
RCRA Empty	30 CY	AP3-24-1	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	AP3-24-2	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	AP3-24-3	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	2664061	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	5081-31995	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	AP3-24-6	3819-161-0301	Landfill/Cell 15
RCRA Empty	30 CY	AP3-24-7	3819-161-0301	Landfill/Cell 15
RCRA Empty	20 CY	AP3-24-8	3819-161-0301	Landfill/Cell 15
Sodium CN	2 Drums	015615183JJK	WPS140365	Incineration
Sodium Hypochlorite	1 Drum	015858193 JJK	XOV-5	Deep Well Injection
Sulfuric Acid	7 Drum	015662519 JJK	I165017EPA	Stabilization/Landfill Cell 15
Zinc CN	2 Drums	015615183JJK	WPS140364	Incineration
Non-hazardous debris	150 CY			landfill

Notes:

CY = cubic yards

Gal. = gallon

Lbs. = pounds

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

V. PUBLIC INFORMATION AND COMMUNITY RELATIONS ACTIVITIES

The Pollution Reports (POLREPs), site photographs, and other Administrative Record documents relating to the Site were made available to the public. They can be viewed at response.epa.gov/AmericanPlatingMonumentSite or at the Administrative Record link on the sidebar of the U.S. EPA Region III Hazardous Site Cleanup Division Home page at <https://www3.epa.gov/>.

On June 9, 2016, EPA issued a fact sheet summarizing the on-site hazards and how the EPA will safely remove and dispose of or treat the chemicals. The fact sheets were distributed to the residences and businesses in the neighborhood of the Site in June 2016.

VI. RESOURCES COMMITTED

This section explains the initial and additional funding requests and presents an estimated total cost summary. Appendix B presents a copy of the funding request documents.

A. INITIAL FUNDING REQUEST

On May 19, 2016, using authority provided under EPA Delegation 14-2, the OSC authorized the expenditure of funds in an amount not to exceed \$200,000 to initiate a removal action intended to mitigate the threat posed to human health and the environment.

B. ADDITIONAL FUNDING REQUEST

In May 27, 2016, EPA issued an Amendment authorizing the expenditure of additional funds and an exemption to the statutory funding and time limits on the Removal Action. The selected Removal Action consisted primarily of the stabilization and off-site disposal of certain chemicals located at the Site.

On June 2, 2016, EPA issued an Action Memorandum to document and request additional CERCLA funding, including an additional \$780,000 from the Removal Action allowance in order to continue to mitigate the threats identified on-site. The increased funding raises the total Removal Action Estimated Project Ceiling to \$1,285,000. An action memo increasing the ceiling for the project to \$1,989,500 was approved on August, 2016.

C. ESTIMATED TOTAL COST SUMMARY

1. Extramural Costs

WESTON (START) (April 8, 2016 – October 18, 2016)	\$ 219,454
WRS (ERRS)(including subcontracting cost)	\$ 1,232,886

2. Intramural Costs

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

U.S. EPA (Direct Costs)	\$ 80,000
Total Project Costs	\$ 1,452,340
Project Ceiling	\$ 1,989,500

D. LOCAL RESOURCES COMMITTED

The following table lists the expenditures that went to local businesses/suppliers.

Local businesses	Dollar amount expended
Hotel	\$92,997
Equipment rental companies	\$54,130
Supply companies	\$31,208
Fuel	\$9,497
Electricity	\$950
Analytical	\$4,525
Credit Card	\$23,848

VII. EFFECTIVENESS OF REMOVAL ACTIONS

This section describes the activities of the various agencies, provides an analytical synopsis, and discusses disposal methods used and quantities removed for the removal activity.

A. ACTIONS TAKEN BY POTENTIALLY RESPONSIBLE PARTIES

No actions were conducted by the Potentially Responsible Party (PRP).

B. ACTIONS TAKEN BY FEDERAL AGENCIES

The U.S. EPA Region III Office of Preparedness and Response directed the management of this project. Gregory Ham, the OSC, directed all removal actions. OSC Ham directed the daily activities of START and ERRS.

C. ACTIONS TAKEN BY STATE AND LOCAL AGENCIES

On April 14, 2016, representatives of the MDE conducted an inspection of the facility. Based on the inspection, MDE asked for assistance from the EPA. On May 3, 2016, OSC Gregory Ham inspected the facility with the inspectors from the Baltimore Housing Department. On May 18,

Federal On-Scene Coordinator's After Action Report American Plating Removal Site

2016, the Baltimore City Housing Department placed a Condemnation Order on the building. The City of Baltimore requested that EPA conduct this removal action due to the financial and manpower burden of such an action.

The Baltimore City Fire Department headed the unified command structure and the Baltimore City Police Department provided 24-hour security services for the Site until June 2. At that time, the EPA acquired command of site operations and Elite People Security Incorporated provided site security services for the duration of the removal action.

D. ACTIONS TAKEN BY CONTRACTORS

WESTON provided technical support to the OSC under the START contract during removal activities. WESTON responsibilities included sampling of hazardous waste; perimeter and indoor air monitoring; air sampling; sump water sampling; comparing sampling results with Baltimore city sewer discharge limits, state, and EPA standards; preparing a trip report, overseeing removal activities; and documenting site activities through photographs and written notes. Site photographic documentation is presented in Appendix C.

Environmental Restoration LLC (ER) served as the main hazardous waste removal contractor under the EPA Region III ERRS contract. ERs responsibilities included site setup, tracking and identifying containers, categorizing hazardous waste, bulking hazardous waste, storage of hazardous waste, pressure washing the building floors, and procurement of sub-contractors. ER was also responsible for disposal processes of hazardous and non-hazardous waste.

VIII. DIFFICULTIES

Although site work was temporarily hindered due to minor set-backs, no significant problems were encountered throughout the course of this removal effort.

A. ITEMS THAT AFFECTED THE REMOVAL ACTION

There was no electricity in the building. ERRS overcame this situation by providing electricity through the use of generators with extension cords and lighting strips throughout the building. The structural integrity of the building was in poor shape; therefore, START provided a structural engineer to inspect the building and cordon off (using caution tape) several areas of concern. The overall condition of the building was determined to be safe for the removal process to continue.

IX. GLOSSARY OF ABBREVIATIONS AND DEFINITIONS

AAR	After Action Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
ER	Environmental Restoration

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

ERRS	Emergency and Rapid Response Service
ERT	Emergency Response Team
MDE	Maryland Department of the Environment
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
OSC	On-Scene Coordinator
POLREP	Pollution Report
PPE	Personal Protective Equipment
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendments and Reauthorization Act of 1986
START	Superfund Technical Assessment and Response Team
U.S. EPA	U. S. Environmental Protection Agency
WESTON®	Weston Solutions, Inc.

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

APPENDICES

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

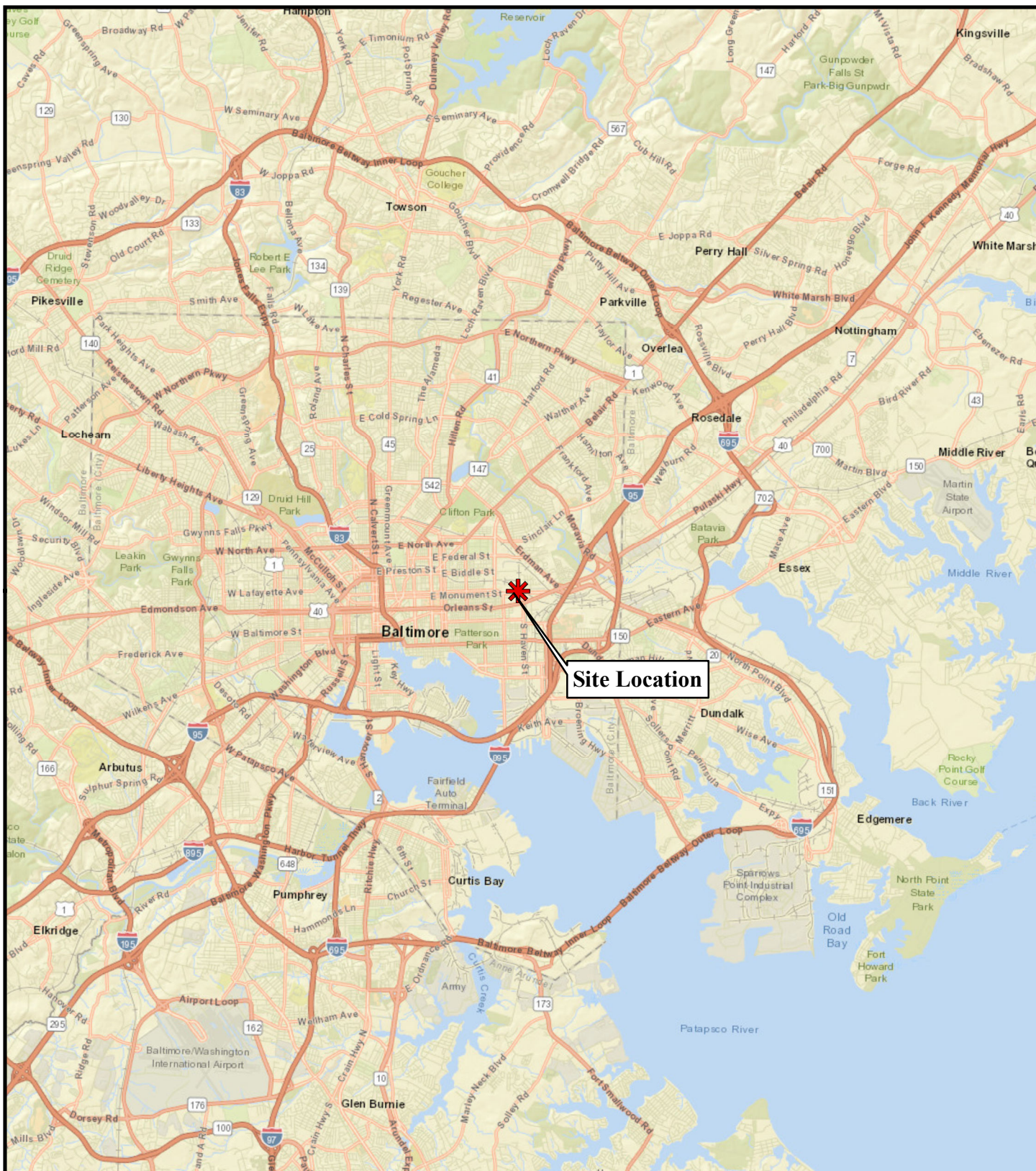
**APPENDIX A
FIGURES**

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

**APPENDIX B
FUNDING REQUEST DOCUMENTS**

**Federal On-Scene Coordinator's After Action Report
American Plating Removal Site**

**APPENDIX C
PHOTOGRAPHIC DOCUMENTATION**



Legend

 Site Location

Aerial Imagery - ESRI Imagery Mapping Service, 2015.



Coordinate System:
UTM Zone 18N Feet, WGS84

0 1 2
Miles

American Plating Removal Site
Baltimore, Maryland

Figure 1
Site Location

Date: 11/3/2016





Legend

- Site Building
- Site Boundary

Aerial Imagery - ESRI Imagery Mapping Service, 2015.



Coordinate System:
UTM Zone 18N Feet, WGS84

0 40 80
Feet

American Plating Removal Site
Baltimore, Maryland

Figure 2
Site Layout

Date: 11/3/2016



POLREP 2 and Special Bulletin A
American Plating Site
4000 – 4008 E. Monument Street
Baltimore, Maryland

DATE: May 19, 2016

FROM: Gregory Ham, On Scene Coordinator
Eastern Response Branch (3HS31)

TO: Regional Response Center
Bonnie Gross (3HS30)
Gerald Heston (3HS31)

SUBJECT: Notification of CERCLA Emergency Removal Action

I. Issue

An emergency assessment was conducted in accordance with the National Oil and Hazardous Pollution Contingency Plan (NCP), 40 CFR Part 300. The On Scene Coordinator (OSC) has identified a threat of release of hazardous substances into the environment. The release meets the criteria for conducting a removal action under Section 300.415 of the NCP. The OSC has determined that immediate funds are needed to mitigate the threat posed to human health and the environment. The OSC has authorized a budget for the removal action not to exceed \$200,000, in accordance with EPA redelegation of authority 14-2.

II. Background

A. Site Description

The site is a former electroplating operation in Baltimore, Maryland, that used to be a large quantity generator under RCRA, and shut down over a year ago. The site consists of a single building located within a commercial/industrial neighborhood. The building contains abandoned electroplating vats, hundreds of containers of electroplating solutions and materials, and two lab areas with multiple small containers of various chemicals.

B. Site Background

On April 14, 2016, representatives of the Maryland Department of the Environment conducted an inspection of the facility. Based on that inspection, MDE asked for assistance from EPA. On May 3, 2016, an OSC inspected the facility with inspectors from the Baltimore City Housing Department. The building was observed to be in very poor condition, with a leaky roof, sagging beams, electricity only in parts of the building, and no water service. There were many drums and totes of material all throughout the building, some in poor condition. There were fibre drums

stored in areas where the roof was leaking. There were vats in the former electroplating area full of liquids, with labels warning of hazards.

C. Types of Substances Present

Large numbers of containers are throughout the building. Many of these are in their original containers, but are not stored in secure conditions. There are drums of acids (hydrochloric, sulfuric, and nitric), cyanide compounds (with copper, sodium, potassium, nickel), sodium hydroxide, toluene, and many more. There are many drums labeled corrosives, and a large tank half full of 50% sodium hydroxide according to the label. A full inventory of the materials in containers is being generated. The building also has two rooms of lab chemicals, including a large variety of acids and other hazardous substances.

D. National Priorities List

The American Plating site is not on the National Priorities List (NPL). The Site is part of an emergency response

E. State and Local Authorities Roles

MDE and the City of Baltimore requested EPA assistance in assessing and cleaning up the site. MDE and the City at the present time do not have the manpower or budgetary resources to complete this cleanup. MDE and the City will support EPA in the further assessment and cleanup of this site.

III. Threats to Public Health or Welfare or the Environment

Section 300.415 (b) (2) of the NCP, 40 C.F.R. § 300.415 (b) (2), identifies factors to be considered in determining the appropriateness of a removal action. Paragraphs i, v, and vii of that section directly apply as follows to the conditions at the American Plating Site:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

There are a number of commercial operations nearby, including a food manufacturing operation on the other side of a twelve foot alley that employs over 100 people. The Amtrak main northeast corridor tracks run about 100 feet behind the building. In the event of a fire or release of cyanide gas, a large number of people could be affected by the plume or by runoff from firefighting water.

- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The roof of the building is in very poor condition and rain enters the building. This creates poor conditions for storage of hazardous substances. Increased heat during the summer months increases the threat of volatilization and release into the environment.

- (vi) The availability of other appropriate federal or state response mechanisms to respond to the release;

MDE and the City have requested that EPA conduct this removal action due to the financial and manpower burden of such an action. MDE and the City are unable to provide the necessary resources to conduct the removal action.

IV. Determination of Emergency

The OSC has determined, based upon information gathered through observations, testing, and interviews, that many hazardous substance have been released and/or have the potential to be released to the environment. The Site conditions constitute an emergency. Therefore, the OSC activated on May 18, 2016.

V. Proposed Actions and Estimated Costs

A. Actions

1. Mobilize personnel and equipment to the Site to implement response actions;
2. Provide security to limit access to the Site to prevent trespassers from contacting hazardous substances and, at the direction of the OSC, secure the building as needed.
3. Stabilize leaking drums, tanks, pipes, vats, and other containers to prevent further releases of hazardous substances, pollutants, or contaminants;
4. Characterize and segregate for removal all hazardous substances, pollutants, and/or contaminants in drums, tanks, pipes, vats, and other containers as well as associated contaminated materials that may pose a threat;
5. Sample, overpack, transfer, consolidate, or otherwise prepare the hazardous substances, pollutants, and/or contaminants identified for removal and off-Site disposal in accordance with Section 121(d) of CERCLA and 40 C.F.R. §300.440;
6. Arrange for and conduct transportation for off-site disposal of hazardous substances, pollutants, and/or contaminants prepared for removal pursuant to Items #4 and #5, above.
7. Dispose off-Site all hazardous substances, pollutants, and/or contaminants identified above pursuant to Section 121(d)(3) of CERCLA and 40 C.F.R. § 300.440.

B. Estimated Costs

	Ceiling
ERRS	\$150,000
START	<u>\$ 30,000</u>
CONTINGENCY	\$ 20,000
 TOTAL	 \$200,000

C. Contribution to Remedial Performance

A remedial action is not anticipated and therefore this removal action is not inconsistent with any proposed remedial action.

D. Compliance with ARARS

The removal action will comply with all Applicable or Relevant and Appropriate Requirements (ARARs), to the extent practicable, considering the exigencies of the situation.

VI. Expected Change in the Situation should No Action be Taken or Action Delayed

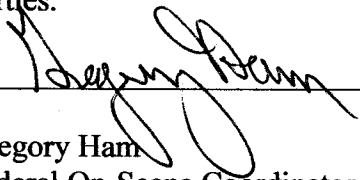
The building will continue to deteriorate as neither the tenant nor the owner are conducting repairs. The deteriorations of the building will increase chances of further degradation of materials in the building, or the likelihood of a fire. As summer arrives the increasing temperatures will continue to further volatilize the hazardous substances on-site, creating an actual or potential release to the environment and to people in the area.

VII. Outstanding Policy Issues

There are no known outstanding policy issues for this Site.

VIII. Enforcement

The OSC will continue to coordinate with EPA enforcement to identify any viable responsible parties.



Gregory Ham
Federal On-Scene Coordinator
EPA Region III

**POLREP 2 and Special Bulletin B
Amendment
American Plating Site
4000 – 4008 E. Monument Street
Baltimore, Maryland**

DATE: May 27, 2016

FROM: Charlie Fitzsimmons, On Scene Coordinator
Eastern Response Branch (3HS31)

TO: Regional Response Center
Bonnie Gross (3HS30)
Gerald Heston (3HS31)

SUBJECT: Notification of CERCLA Emergency Removal Action

I. Issue

An emergency assessment was conducted in accordance with the National Oil and Hazardous Pollution Contingency Plan (NCP), 40 CFR Part 300. The On Scene Coordinator (OSC) has identified a threat of release of hazardous substances into the environment. The release meets the criteria for conducting a removal action under Section 300.415 of the NCP. The OSC has determined that immediate funds are needed to mitigate the threat posed to human health and the environment. The OSC had originally authorized a budget for the removal action not to exceed \$200,000, in accordance with EPA re-delegation of authority 14-2. This Amendment authorizes a \$250,000 ceiling within EPA re-delegation authority 14-2. Site conditions have not changed. This amendment changes the original May 19, 2016 Special Bulletin A document to add additional which includes the contingency.

II. Background

A. Site Description

The site is a former electroplating operation in Baltimore, Maryland, that used to be a large quantity generator under RCRA, and shut down over a year ago. The site consists of a single building located within a commercial/industrial neighborhood. The building contains abandoned electroplating vats, hundreds of containers of electroplating solutions and materials, and two lab areas with multiple small containers of various chemicals.

B. Site Background

On April 14, 2016, representatives of the Maryland Department of the Environment conducted an inspection of the facility. Based on that inspection, MDE asked for assistance from EPA. On May 3, 2016, an OSC inspected the facility with inspectors from the Baltimore City Housing

Department. The building was observed to be in very poor condition, with a leaky roof, sagging beams, electricity only in parts of the building, and no water service. There were many drums and totes of material all throughout the building, some in poor condition. There were fibre drums stored in areas where the roof was leaking. There were vats in the former electroplating area full of liquids, with labels warning of hazards.

C. Types of Substances Present

Large numbers of containers are throughout the building. Many of these are in their original containers, but are not stored in secure conditions. There are drums of acids (hydrochloric, sulfuric, and nitric), cyanide compounds (with copper, sodium, potassium, nickel), sodium hydroxide, toluene, and many more. There are many drums labeled corrosives, and a large tank half full of 50% sodium hydroxide according to the label. A full inventory of the materials in containers is being generated. The building also has two rooms of lab chemicals, including a large variety of acids and other hazardous substances.

D. National Priorities List

The American Plating site is not on the National Priorities List (NPL). The Site is part of an emergency response

E. State and Local Authorities Roles

MDE and the City of Baltimore requested EPA assistance in assessing and cleaning up the site. MDE and the City at the present time do not have the manpower or budgetary resources to complete this cleanup. MDE and the City will support EPA in the further assessment and cleanup of this site.

III. Threats to Public Health or Welfare or the Environment

Section 300.415 (b) (2) of the NCP, 40 C.F.R. § 300.415 (b) (2), identifies factors to be considered in determining the appropriateness of a removal action. Paragraphs i, v, and vii of that section directly apply as follows to the conditions at the American Plating Site:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

There are a number of commercial operations nearby, including a food manufacturing operation on the other side of a twelve foot alley that employs over 100 people. The Amtrak main northeast corridor tracks run about 100 feet behind the building. In the event of a fire or release of cyanide gas, a large number of people could be affected by the plume or by runoff from firefighting water.

- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The roof of the building is in very poor condition and rain enters the building. This creates poor conditions for storage of hazardous substances. Increased heat during the summer months increases the threat of volatilization and release into the environment.

- (vi) The availability of other appropriate federal or state response mechanisms to respond to the release;

MDE and the City have requested that EPA conduct this removal action due to the financial and manpower burden of such an action. MDE and the City are unable to provide the necessary resources to conduct the removal action.

IV. Determination of Emergency

The OSC has determined, based upon information gathered through observations, testing, and interviews, that many hazardous substance have been released and/or have the potential to be released to the environment. The Site conditions constitute an emergency. Therefore, the OSC activated on May 18, 2016.

V. Proposed Actions and Estimated Costs

A. Actions

1. Mobilize personnel and equipment to the Site to implement response actions;
2. Provide security to limit access to the Site to prevent trespassers from contacting hazardous substances and, at the direction of the OSC, secure the building as needed.
3. Stabilize leaking drums, tanks, pipes, vats, and other containers to prevent further releases of hazardous substances, pollutants, or contaminants;
4. Characterize and segregate for removal all hazardous substances, pollutants, and/or contaminants in drums, tanks, pipes, vats, and other containers as well as associated contaminated materials that may pose a threat;
5. Sample, overpack, transfer, consolidate, or otherwise prepare the hazardous substances, pollutants, and/or contaminants identified for removal and off-Site disposal in accordance with Section 121(d) of CERCLA and 40 C.F.R. §300.440;
6. Arrange for and conduct transportation for off-site disposal of hazardous substances, pollutants, and/or contaminants prepared for removal pursuant to Items #4 and #5, above.
7. Dispose off-Site all hazardous substances, pollutants, and/or contaminants identified above pursuant to Section 121(d)(3) of CERCLA and 40 C.F.R. § 300.440.

B. Estimated Costs

	Ceiling
ERRS	\$220,000
START	<u>\$ 30,000</u>

TOTAL \$250,000

C. Contribution to Remedial Performance

A remedial action is not anticipated and therefore this removal action is not inconsistent with any proposed remedial action.

D. Compliance with ARARS

The removal action will comply with all Applicable or Relevant and Appropriate Requirements (ARARs), to the extent practicable, considering the exigencies of the situation.

VI. Expected Change in the Situation should No Action be Taken or Action Delayed

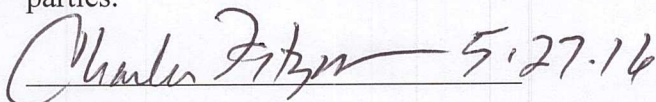
The building will continue to deteriorate as neither the tenant nor the owner are conducting repairs. The deteriorations of the building will increase chances of further degradation of materials in the building, or the likelihood of a fire. As summer arrives the increasing temperatures will continue to further volatilize the hazardous substances on-site, creating an actual or potential release to the environment and to people in the area.

VII. Outstanding Policy Issues

There are no known outstanding policy issues for this Site.

VIII. Enforcement

The OSC will continue to coordinate with EPA enforcement to identify any viable responsible parties.

 5.27.16

Charlie Fitzsimmons
Federal On-Scene Coordinator
EPA Region III



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Request for Approval of a Ceiling Increase for a Removal Action at the American Plating Site, Baltimore, Maryland

FROM: Gregory Ham, On-Scene Coordinator Eastern Response Branch (3HS31) *Request for Greg Ham 1 June 16*

TO: Bonnie Gross, Director
Office of Preparedness and Response (3HS30)

THRU: Gerald T. Heston, Chief
Eastern Response Branch (3HS31)

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a ceiling increase for the time-critical Removal Action described herein for the American Plating Site (EPA site ID No. A35R), located at 4000 – 4008 E. Monument Street, Baltimore, MD (Site). The Site is an abandoned electroplating facility located in a commercial/industrial area several miles east of downtown Baltimore. Site evaluation activities were performed in May 2016 in accordance with the National Oil and Hazardous Substances Contingency Plan (NCP), 40 CFR Part 300. The Site evaluation documented a threat to public health or welfare or the environment due to large quantities of hazardous substances, and/or pollutants or contaminants which may present and immanent and substantial danger to the public health or welfare (hereafter referred to pollutants or contaminants), that pose an endangerment stored in an unsafe manner in a dilapidated building. The On-Scene Coordinator (OSC) has determined that the Site meets the criteria in Section 300.415 of the NCP for initiating a Removal Action. Additional CERCLA funding, including an additional \$780,000 from the Removal Action allowance, is necessary to continue to mitigate the Site threats identified in this Action Memorandum. The increased funding raises the total Removal Action Estimated Project Ceiling to \$1,285,000. Of this, an estimated \$1,000,000 comes from the Regional Removal Allowance.

II. SITE DESCRIPTION AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Site is a former electroplating operation in Baltimore, Maryland, that shut down over a year ago. The Site consists of a single building located within a commercial/industrial

neighborhood. There are abandoned electroplating vats, hundreds of containers of electroplating solutions and materials, and two lab areas with multiple small containers of various chemicals.

On April 14, 2016, representatives of the Maryland Department of the Environment (MDE) conducted an inspection of the facility. Based on that inspection, MDE asked for assistance from EPA. On May 3, 2016, an OSC inspected the facility with inspectors from the Baltimore City Housing Department. The building was observed to be in very poor condition, with a leaky roof, sagging beams, electricity only in parts of the building and no water service. There were many drums and totes of material throughout the building, some in poor condition. Some fibre drums were stored in areas where storm water from a leaking roof fell upon them causing some drums to split. There were vats in the former electroplating area still full of liquids, with labels warning of hazards. There are large numbers of containers located throughout the building in a careless and haphazard manner.

On May 18, 2016, the OSC returned to the Site with members of the START team to conduct sampling of materials in the building. The Baltimore City Housing Department inspectors were there, along with members of the Baltimore City Fire Department. After an inspection of the building and its contents, the City Housing Department posted a Condemnation Order on the building.

From the hazardous materials perspective, there are drums of acids (hydrochloric, sulfuric, and nitric), cyanide compounds (of copper, sodium, potassium, nickel, and zinc), sodium hydroxide, toluene, and many more. There are many drums labeled corrosives, and a large tank half full of 50% sodium hydroxide according to the label. There are many drums with toxic and/or poison labels on them. There are vats from the former electroplating lines that still contain electroplating solutions, including acids and at least one with cyanide. There are two rooms of lab chemicals, including a large variety of acids and other hazardous substances. A full inventory of the materials in containers is being compiled. The OSC understands that the Site is owned by one entity but that some of the chemicals in the building may be owned by an individual who intended to purchase the property and may or may not currently be a lessee.

2. Physical Location/Site Characteristics

The Site is located in a commercial/industrial area known as the Orangeville Industrial Area in east Baltimore, approximately 4 miles east of downtown. The Amtrak rail corridor runs approximately 100 feet to the north of the building. The geographic coordinates of the site are 39° 17' 58.8804" (39.299689) north latitude and 76° 33' 52.4124" (-76.564559) west longitude, as measured at the front of the building.

3. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

Hazardous substances onsite include cyanide compounds (of zinc, potassium, copper, and sodium), sodium hydroxide, and acids (sulfuric, hydrochloric, nitric, phosphoric). There are two lab rooms with multiple bottles of a wide variety of chemicals. Many of these chemicals are hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), including, among others Phosphoric Acid, Ferric Chloride and Sodium Hydroxide, which are listed in 40 C.F.R. § 302.4. There are a number of commercial operations nearby, including a food manufacturing operation on the other side of a twelve foot alley that employs over 100 people. The Amtrak main northeast corridor tracks run about 100 feet behind the building. As detailed above there are both acids and cyanide compounds stored in containers of questionable integrity. Acid and cyanide when mixed together form hydrogen cyanide gas, which is extremely toxic as well as very explosive. In the event of a fire or release of cyanide gas, a large number of people could be affected by the plume or by runoff from firefighting water.

- B. 300.415 (b) (2) (v) “Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released”;

The roof of the building is in very poor condition, and rain enters the building. Numerous containers in the building are damaged due to this continual exposure to water. This creates poor conditions for storage of hazardous substances. Increased heat during the summer months increases the threat of volatilization and release into the environment.

- C. 300.415 (b) (2) (vii) “The availability of other appropriate federal or state response mechanisms to respond to the release”

MDE and the City have requested that EPA conduct this removal action due to the financial and manpower burden of such an action. MDE and the City are unable to provide the necessary resources to conduct the removal action. There are no other state or federal response mechanisms to respond to this situation.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. There are a large number of hazardous substances and/or pollutants or contaminants in the building, stored in unsafe, uncontrolled conditions. The building is in extremely poor condition.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

The proposed removal action consists of the following:

There are numerous containers of chemicals, many labeled as hazardous substances, stored in an dangerous manner in this dilapidated building. The roof of the building is leaking, allowing water to fall upon the stored chemicals compromising the integrity of the containers. The building had reportedly been illegally connected to electricity after its service had been disconnected by the utility company, and improper wiring was noted throughout the building, leading to an increased risk of fire. All of these conditions increase the threat of a release that would be harmful to the health and welfare of the workers in the surrounding buildings, passengers on the rail lines, and nearby residents.

4. National Priorities List

The Site is not on the National Priorities List (NPL).

B. Other Actions to Date

On May 19, 2016 the OSC issued a Special Bulletin, which was amended on May 27, 2016, and activated an Emergency Removal Response Services contractor to begin cleanup of the hazardous substances and pollutants or contaminants in the building.

C. State and Local Authorities' Roles

The Maryland Department of the Environment and the City of Baltimore have requested EPA assistance in responding to conditions at the Site and will continue to be involved. MDE and local authorities have requested that the OSC continue assessment and response activities in order to ensure protection of human health in a timely manner. The OSC will continue to coordinate with MDE and the City.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

There have been, and continue to be, releases and/or threatened releases of hazardous substances and/or pollutants or contaminants from the American Plating Site into the environment which, under current conditions, present a threat that poses an endangerment to public health, welfare and/or the environment.

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b) (2) (i), (v), and (vii) of Section 300.415 directly apply as follows to the conditions as they exist at the American Plating Site.

- A. 300.415 (b)(2)(i) “Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants”

1. Mobilize personnel and equipment to the Site to implement response actions;
2. Provide security to limit access to the Site to prevent trespassers from coming into contact with hazardous substances and pollutants or contaminants or causing or exacerbating release and/or threatened release thereof, including, but not limited to, physical barriers preventing such entry.
3. Stabilize leaking drums, tanks, pipes, vats, and other containers to prevent further releases of hazardous substances and pollutants or contaminants;
4. Characterize and segregate all hazardous substances and pollutants or contaminants in drums, tanks, pipes, vats, and other containers as well as associated contaminated materials which may pose a threat;
5. Hazardous substances and pollutants or contaminants and their containers, which in the opinion of the OSC are in marketable condition for use or reuse, may be transferred off-site in accordance with Section 121(d)(3) of CERCLA and 40 CFR 300.440.
6. Sample, overpack, transfer, consolidate, or otherwise prepare the hazardous substances and pollutants or contaminants identified for removal and off-Site disposal in accordance with Section 121(d) of CERCLA and 40 C.F.R. §300.440;
7. Arrange for and conduct transportation for off-site disposal of hazardous substances and pollutants or contaminants prepared for removal pursuant Item #6 above.
8. Dispose off-Site all hazardous substances and pollutants or contaminants identified in Item #6 above pursuant to Section 121(d)(3) of CERCLA and 40 C.F.R. § 300.440.

B. Contribution to Remedial Performance

The Site is not on the National Priorities List, but the proposed Removal Action will be consistent with any future actions that may be taken at the Site. The Removal Action will focus on removing the threat currently posed by the exposure of workers and residents in the area of the Site to a potential release of hazardous substances and pollutants or contaminants. This threat will be abated by removal of the hazardous substances and pollutants or contaminants.

C. Applicable or Relevant and Appropriate Requirements (ARARs)

The proposed Removal Action will comply with Federal and State ARARs to the extent practicable given the exigencies of the situation. On June 1, 2016, the OSC requested that MDE provide a list of potential ARARs by June 9, 2016.

D. Estimated Costs

The proposed distribution of funding is as follows:

Extramural Costs	Previous	This Request	Ceiling
Regional Allowance Costs (This cost category includes estimates for ERRS contractors, subcontractors, letter contracts, orders for services, notices to proceed, alternative technology contracts, and inter-agency agreements with other Federal Agencies)	\$220,000	\$780,000	\$1,000,000
Other Extramural Costs Not Funded from the Regional Allowance START Contractor Total CLP	\$30,000	\$120,000	\$150,000
Subtotal, Extramural Costs	\$250,000	\$900,000	\$1,150,000
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)		\$135,000	\$135,000
TOTAL REMOVAL PROJECT CEILING	\$250,000	\$1,035,000	\$1,285,000

VII. EXPECTED CHANGE IN SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The building will continue to deteriorate as neither the suspected tenant nor the owner are conducting repairs. This will increase chances of further degradation of materials in the building, or the likelihood of a fire. As summer arrives the increasing temperatures will continue to further volatilize the hazardous substances on-Site, continuing to create an actual or potential release to the environment and exposure to people in the area.

VIII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues related to the proposed Removal Action.

IX. ENFORCEMENT

Direct Extramural Costs	\$1,285,000
Direct Intramural Costs	\$35,000
Total Direct Costs	\$1,320,000
Indirect Cost (112.98% x Direct Costs)	\$1,491,336
Total Costs (Direct and Indirect)	\$2,811,336

The EPA Region III Removal Enforcement Section has been provided with all background information available to pursue Enforcement Actions pertaining to the American Plating Site (see attached Confidential Enforcement Addendum).

The total EPA costs for this Removal Action based upon full-cost accounting practices are estimated to be \$1,911,496.¹

X. RECOMMENDATION

This decision document represents the selected Removal Action for the American Plating Site in Baltimore, Maryland, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. Conditions at the Site continue to meet the NCP Section 300.415(b)(2) factors for a removal and I recommend your approval of the proposed removal action. The total project ceiling will be \$1,280,000, of which \$1,000,000 comes from the Regional Removal Allowance.

By signing this Action Memorandum, you are also hereby establishing the documents listed below as the Administrative Record supporting the issuance of this Action Memorandum, pursuant to Section 113(k) of CERCLA, 42 U.S.C. 9613(k) and EPA delegation No. 14-22.

1. MDE RCRA Subtitle - C Investigation Former American Plating Corporation, 4004 East Monument Street, Baltimore, MD Inspection. April 12, 2016
2. MDE Land Management Administration Solid Waste Program Report Of Observations Joint Inspection with EPA. June 2, 2015
3. Special Bulletin, May 19, 2016
4. Special Bulletin, May 27, 2016

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Action by the Approving Official:

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may present an imminent and substantial endangerment to the public health or welfare or to the environment. I concur with the recommended removal action as outlined in the Action Memorandum.

APPROVED: Bonnie Gross **DATE:** 6/2/16
Bonnie Gross, Director
Office of Preparedness and Response
Hazardous Site Cleanup Division
EPA Region 3

Attachments:

1. Enforcement Confidential Memo

PHOTOGRAPHIC DOCUMENTATION LOG
American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 1: Shelving units located in the laboratory containing various sized plastic and glass containers.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START



PHOTO 2: Shelving units in the laboratory containing various small glass and plastic containers.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG

American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 3: View of a large tank located in the former electroplating area labeled as containing 50% sodium hydroxide.
DATE: May 3, 2016 **PHOTOGRAPHER:** Weston START



PHOTO 4: Numerous 55-gallon polyethylene, metal, and fiber drums covered with a tarp in the former electroplating area.
DATE: May 3, 2016 **PHOTOGRAPHER:** Weston START

PHOTOGRAPHIC DOCUMENTATION LOG

American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 5: Damaged fiber drum located in the former electroplating area.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START



PHOTO 6: Chemical dipping vats.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG

American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 7: 55-gallon drums in the former electroplating area covered with a tarp and labeled as waste.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START



PHOTO 8: View of numerous drums and other containers located in the chemical storage room.

DATE: May 3, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG

American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 9: Bulking of compatible hazardous materials for disposal with area monitoring device in the background.

DATE: June 23, 2016

PHOTOGRAPHER: Weston START



PHOTO 10: Disposal of hazardous waste drums.

DATE: July 15, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG
American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002

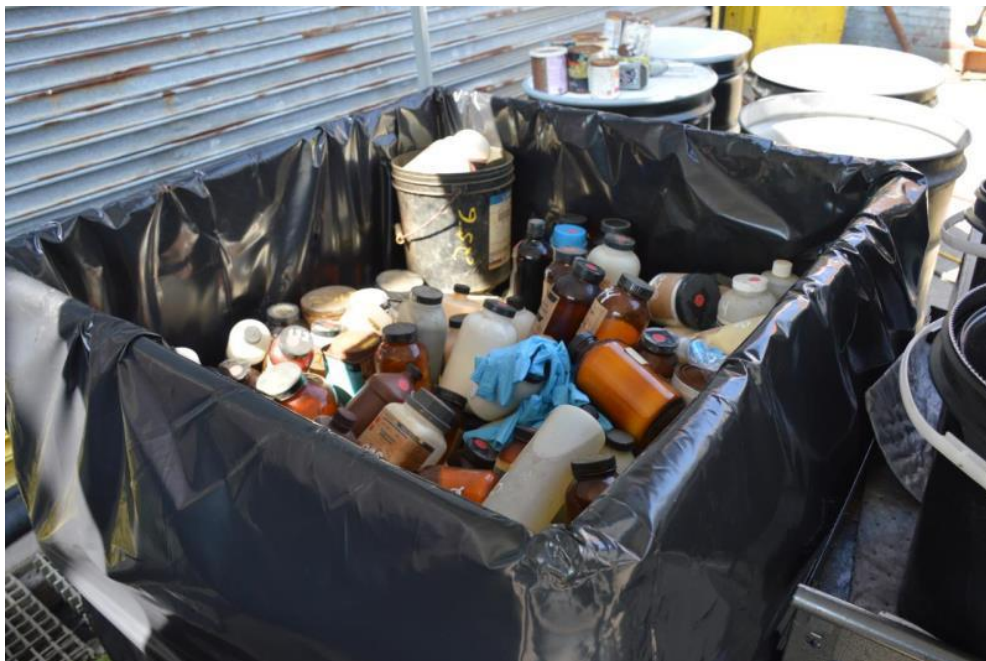


PHOTO 11: Disposal of hazardous waste from the laboratories.
DATE: July 15, 2016

PHOTOGRAPHER: Weston START

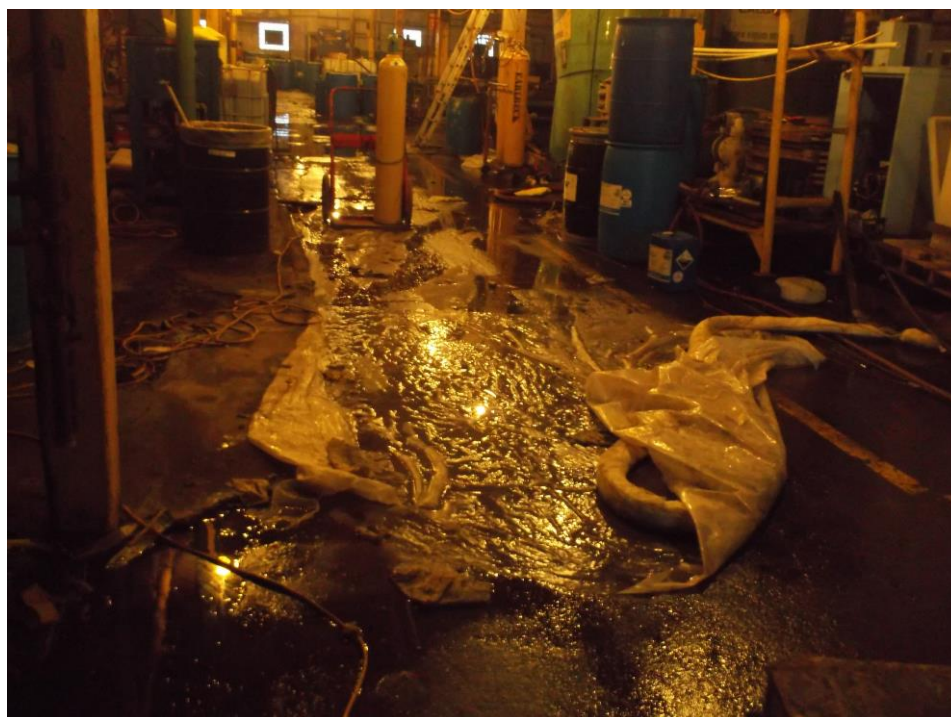


PHOTO 12: Rainwater that leaked into the building.
DATE: July 29, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG

American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 13: Hazardous waste from the laboratories.

DATE: August 2, 2016

PHOTOGRAPHER: Weston START



PHOTO 14: The building after the removal of the all equipment and materials.

DATE: September 9, 2016

PHOTOGRAPHER: Weston START

PHOTOGRAPHIC DOCUMENTATION LOG
American Plating Removal Site • Baltimore, MD • After Action Report
EPA Region III START • Contract No. EP-S3-15-02 • TDD No. W501-16-05-002



PHOTO 15: Pressure washing the floor of the building after hazardous materials and electroplating lines and vats had been removed.

DATE: September 12, 2016

PHOTOGRAPHER: Weston START



PHOTO 16: Bulked compatibles staged for hazardous waste disposal.

DATE: September 22, 2016

PHOTOGRAPHER: Weston START
