# U.S. ENVIRONMENTAL PROTECTION AGENCY
# POLLUTION REPORT

EPA Region 5 Records Ctr.
247618

## I. HEADING

DATE: April 11, 2000

SUBJECT: Letts Drop Forge, Detroit, Wayne County, Michigan

FROM: K. Grunert, OSC, Region 5, ERB, Grosse Ile, MI

TO:
K. Mould, USEPA, OSWER, Washington, DC. . . . . (VIA LAN)
R. Karl, Chief, ERB, Chicago, IL . . . . . (VIA LAN)
J. El-Zein, Chief RS1, Grosse Ile, MI . . . . . (VIA LAN)
W. Messenger, USEPA, Chief RS1, Chicago, IL . . . . . (VIA LAN)
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S. Jensen, ESS, Chicago, IL . . . . . (VIA LAN)
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C. Carpenter, MDEQ, Lansing, MI . . . . . (E-mail)
Duty Officer, NRC, Washington, DC . . . . . (E-mail)
M. Chezick, DOI, Philadelphia, PA . . . . . (E-mail)

POLREP 1 - Initial (With Attachments, Photograph 1, Photograph 2, Photograph 3)

Start Date: March 31, 2000

## II. BACKGROUND

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| Site No.: | Pending |
| Delivery Order Number: | NA |
| Response Authority: | CERCLA |
| CERCLIS ID Number: | NA |
| NPL Status: | Not on NPL |
| MDEQ Notification: | Yes |
| Latitude/Longitude: | 42°19'03.4"North/83°04'31.1"West |
| Start Date: | March 31, 2000 |
| Completion Date: | NA |

## III. SITE INFORMATION

### A. Incident Category

Emergency Response - Inactive Facility

### B. Site Description

1. Site Location

The Letts Drop Forge site is located at 2714 W. Jefferson in Detroit, Wayne County, Michigan, at 42°19'03.4"North/83°04'31.1"West. The site is located on the northwest corner of West Jefferson Street and St. Anne Street and is situated in a commercial/industrial area. The 1.5 acre site is an abandoned steel forging manufacturing facility, currently owned by Letts Industries, Inc. The site is bounded by West Jefferson Street to the south, St. Anne

Street to the east, an alley to the north, and a vacant parking area to the west. The Detroit River is located approximately one-quarter mile to the south of the site.

Letts Drop Forge was a metal forging facility that operated from approximately 1909 to 1996. The facility has been vacated for the past several years. The facility consists of two brick buildings and an inner courtyard with a gated entry facing south to West Jefferson Street. A small electrical building is located in the north central portion of the site, and a transformer pad is located directly south of the electrical building.

2. Description of Threat

On March 30, 2000, U.S. EPA observed evidence of spilled material coming out of the facility's electrical transformers and leading to the City of Detroit sewer system. Inspection of the site revealed the presence of six electrical transformers within the inner courtyard. Four of the transformers had been tipped over and were empty of transformer oils. Two of the transformers remained upright and contained transformer oils. Oily stains were observed leading from the transformers directly towards the truck loading dock. The truck loading dock was full of standing water/oil, with oily stains eventually leading off the property and into a storm sewer catch basin located on the curb of West Jefferson Street. Laboratory analysis confirmed the presence of polychlorinated biphenyls (PCBs) in the transformer oils, in the stained soils, and in the oil/water located in the truck loading dock. Additionally, an electrical switching gear located in the electrical building and three capacitors located inside one of the buildings were determined to be contain PCBs.

C. Site Inspection Results

On March 31, 2000, U.S. EPA, START and the City of Detroit Bureau of Environmental Affairs mobilized to the site to conduct emergency response activities. START collected site photographs and documented site conditions. START also conducted air monitoring, collected samples for hazardous categorization testing (hazcatting), and collected samples for laboratory analysis.

A total of six electrical transformers were observed within the inner courtyard of the facility. Two of the transformers remained upright and were full of transformer oils. The remaining four transformers had been tipped over, with oily stains leading toward the northern and southern boundaries of the property. Oily stains were observed leading to a storm sewer located along West Jefferson Street.

Inspection of the inner portions of the buildings revealed the presence of approximately 33 drums and two aboveground storage tanks. Several small pits containing varying amounts of oil/water and areas with freshly spilled oils were observed within the buildings. A PCB removal contractor retained by Letts Industries identified three capacitors in one of the buildings and an electrical switching gear located in the electrical building as containing PCBs. Several used hypodermic needles were observed in one area of the buildings.

START collected five liquid samples for laboratory analysis of PCBs. Oil collected from one of the standing transformers indicated Aroclor 1254 and Aroclor 1260 at concentrations of 750 parts per million (ppm) and 550 ppm, respectively. Oil collected from the second standing transformer indicated Aroclor 1254 and Aroclor 1260 concentrations of 450 ppm and 350 ppm. Oil collected from one of the tipped transformers indicated Aroclor 1260 at a

concentration of 15 ppm. An oil/water sample collected from the truck loading dock indicated Aroclor 1254 and Aroclor 1260 at respective concentrations of 65 ppm and 50 ppm. PCBs were not detected above the laboratory detection limits of 1 ppm in a water sample collected from the storm sewer. The Detroit Water & Sewer Department also collected a water sample from the storm sewer, but results of their analysis have not yet been received.

START collected three soil samples for laboratory analysis of PCBs. Soil samples were collected from surficial soils directly adjacent to the tipped transformers, from surficial soils near the central portion of the courtyard area, and from surficial soils adjacent to the storm sewer catch basin. Aroclor 1254 was detected in the soil samples at concentrations ranging from 3.3 ppm to 23 ppm. Aroclor 1260 was detected in the soil samples at concentrations ranging from 2.9 ppm to 17 ppm.

The environmental response contracted retained by Letts Industries also collected samples for PCB analysis. A water sample collected from the truck loading dock indicated Aroclor 1260 at a concentration of 13 parts per billion (ppb). Two composite samples collected from stained soils and debris indicated Aroclor 1260 at concentrations of 23 ppm and 16 ppm. PCBs were not detected above laboratory detection limits in an oil sample collected from a pit within one of the inner buildings and in a water sample collected from the staged tank trailer. Additional analysis of a surficial soil sample collected from an oily stain located within one of the buildings directly west of the transformer pad did not indicate detectable concentrations of PCBs.

## IV. RESPONSE INFORMATION

### A. Situation

1. Current situation:

As of April 11, 2000, 24-hour security is being provided to the site and West Jefferson Street remains closed to through traffic. An environmental response contractor retained by Letts Industries continues to provide emergency removal activities. To date, contaminated surficial soils and debris have been scraped up and placed in a roll off dumpster, which is currently staged at the site. The storm sewers have been pumped out and the truck loading dock has been periodically pumped out to prevent liquids from flowing off the site. Recovered liquid currently remains staged in tanks along West Jefferson Street. The PCB capacitors, PCB switching gear and PCB transformers (and associated dielectric fluids) have been removed from the site.

2. Removal activities to date:

Stained soils have been scraped up and placed in drums, which are currently staged onsite. Debris within the courtyard has been picked up/swept up and has been staged in roll off dumpsters. Plastic has been placed over ground surfaces with significant oil staining. Oily sediment has been scraped out of the bottom of the truck loading dock and has been staged in roll off dumpsters. A powerwash unit has been used to clean off the stained concrete areas located near the storm sewer and on the floors/walls of the truck loading dock. Absorbent booms and berms have been placed along the north and south entrances to the courtyard to prevent surficial runoff from leaving the site. To date, an estimated 7,000 gallons of liquid have been pumped from the truck loading dock and sewers. The pumped liquid currently remains staged onsite in tanks. Remaining liquid from the two standing transformers has been removed from the site for disposal. The six transformer carcasses, the three

capacitors, and the switching gear have also been transported off site for disposal.

3. Enforcement:

The PRP has been identified and letters notifying them of potential liability under Section 107(a) of CERCLA are being prepared at the removal enforcement section.

B. Planned Removal Activities

A meeting was held on April 5, 2000, to discuss the current situation of the response activities. The meeting was attended by representatives from the U.S. EPA, Letts Industries and their environmental response contractor, the City of Detroit Water and Sewer Department, and the City of Detroit Environmental Affairs. Upon completion of the meeting, Letts Industries indicated that they are willing to cooperate with the U.S. EPA in order to comply with pertinent regulatory agencies and clean the site up in a timely manner. Per request of the U.S. EPA, Letts Industries, Inc., has recently prepared a detailed workplan and Health and Safety Plan to address clean up activities of the entire site.

C. Next Steps

Pending workplan approval, Letts Industries intends to continue site clean up activities.

D. Key Issues

Additional site security is required for the site. Disposal options for the removed PCB materials must be compliant with U.S. EPA regulations.

## V. COST INFORMATION

Estimated site costs as of 4/11/2000:

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| START | $6,337.50 |
| U.S. EPA | $2,000.00 |