US EPA RECORDS CENTER REGION 5
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2/3/98

ecology and environment, inc.

International Specialists in the Environment

Job Number KJ5103

Mich Con H

201 South Green Avenue

Detroit Michigan

TDD: S05-9801-020

PAN: 8J2001SIXX

E & E Job Number KJ5103

Telephone Code Number

Site Name Mich Con H
201 South Green Avenue

City/State Detroit, Michigan

TDD S05-9801-020

PAN 8J2001SIXX

SSID

Start / Finish Date 2/3/98 / 2/13/98

Book 2 of 2

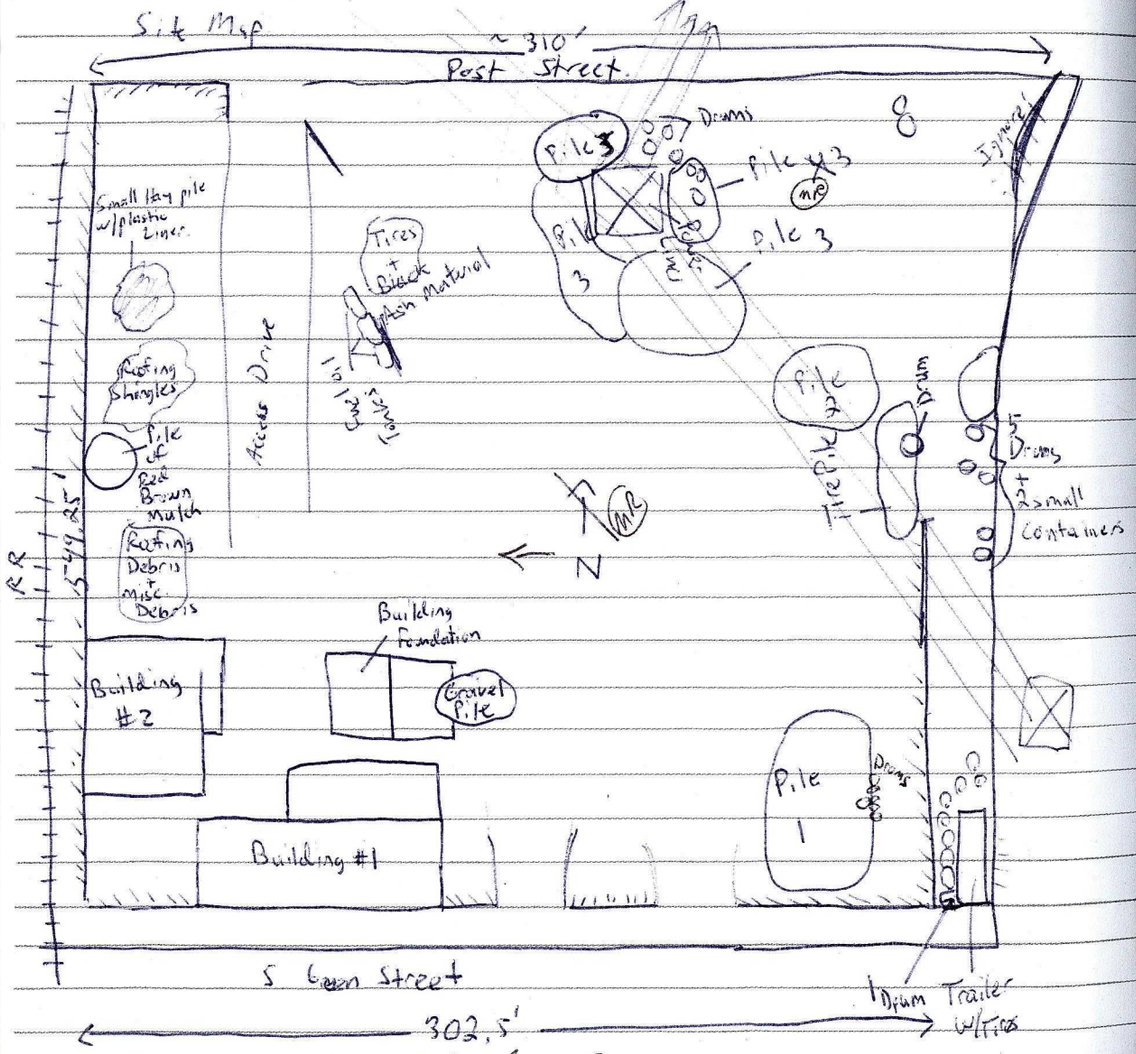
E & E Emergency Response Center: (716) 684-8940
E & E Corporate Center: (716) 684-8060
MEDTOX Hotline: (501) 370-8263
E & E Safety Director (Home): (716) 655-1260

2/3/98 Mich Con # SOS-98CI-020

0855 START Ramaly, START M. Dieckhaus arrive at site and met with Ed Novak, MDEQ. Group took a tour of the site. Initial observations included: several small mounds of soil + construction debris. Several drums were evident. Some ground areas appeared irregular and may possibly be dump sites. MR

0930 MDEQ Ed Novak leaves site. START prepare to document detailed site features + conditions. MR

Site Map



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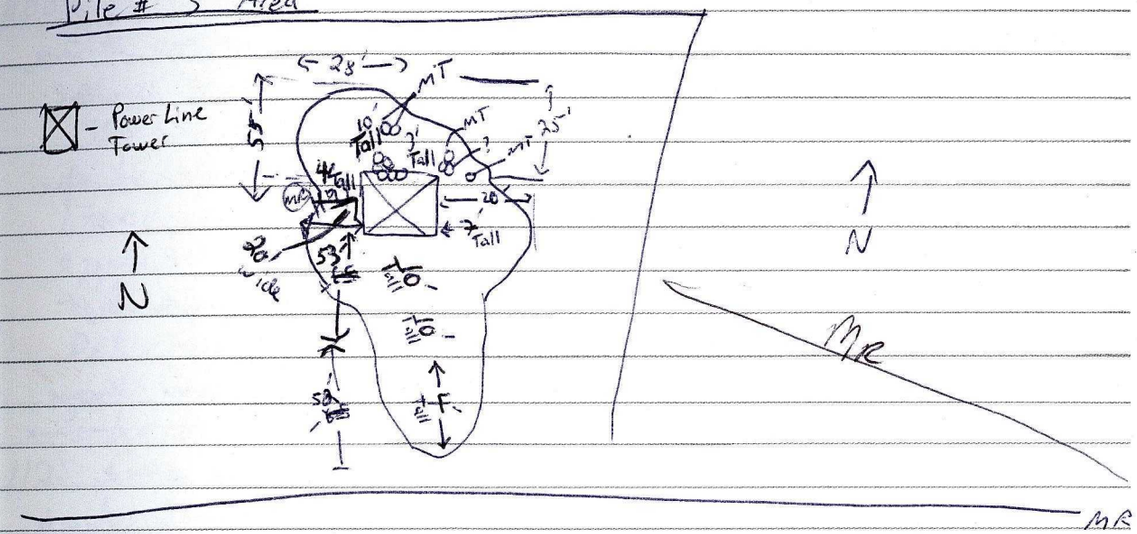
Pile # 3 Area



MR

- Site is ~310' on North side, 549' on West side, and 302' on South side. The site is bordered to the south by Green Street, to west by 2 CSX RR Tracks, to the North by Post Street and the east by a ~~Manufacturer~~ commercial business. Across Green Avenue to the south is Farm Fresh Food Distributors.

MR

~1120 START Ramaly + Dieckhaus begin Photodocumenting + Videodocumenting Site Conditions. START Ramaly observes a semi-trailer at the SE corner filled with Tires and debris. One drum is mixed with the debris. Numerous drums (some with contents) are scattered along the east side of the site. No markings were evident on these drums. START Ramaly observes that the eastern side of the site was utilized as a railroad spur. The ground is torn up and appears to have unnatural contouring suggesting the depositing of debris. MR

The east side of the site also contains 3 piles of soil and numerous types of debris. START M. Dieckhaus documented general pile constituents. MR While Photo/Video documenting pile 3, START observed many drums (empty + w/ contents) through out the pile. The main concentration of drums is located north of a high voltage power line tower in Pile 3. MR

1145 START Ramaly observes 2 drums in Northeast corner of site with labels. Both labelled Agitene, Parts Cleaner by Gray Mills Corp. Combustible Mixture.

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1 drum is missing a bung and contains material. The other has rusted and deteriorated significantly, but is full and contains a grey solid. —mr

Backnote: At 930 hours START Ramsey measured site boundaries and inspected west side of the property for inclusion in the site map. West + Center portions of the site are littered with roofing, household, and construction debris. START Ramsey noted a small mound of ~~hay~~ hay with a plastic liner. START also noted a pile of red brown mulch / soil north of Building 2. 2 Buildings are located in the SW corner of the site. The buildings are empty except for bricks + debris. Building 1 appears to have sustained some fire damage. Building 2 appears to be a warehouse with some structural damage. No drums or spill materials were noted in either building. —mr

1215 START Ramsey and START Dieckhaus completed site activities and left site. Upon leaving site area START noted that the Detroit Police Departments 4th precinct is located at Fort + Green. Also a School is located ~~North~~ Northwest of the site on ~~Pot~~ Post and Fort. —mr

Mark Ramsey 2/3/98

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1105 SAPM Dieckhaus, START Tim Busby, and OSC Dollhopf arrive site and drive through center of site on road. SAPM Dieckhaus shows piles + group walk around site + inspect piles. OSC Dollhopf finds 2 capacitors (~1-gallon) that appear to be old + potentially PCB-containing under high voltage line tower on north side of site. One of the capacitors appears to have leaked oil. No fence is present on north side of site bordering Post Road + access is unlimited. Debris on site appears to have been dumped. There is no gate ~~or fence~~ on south side of site inbetween fence + building + road leads onto site. —tmb

1125 Group depart site and OSC Dollhopf instructs START to photo- and videodocument capacitors, area near them, and labels and collect

- 2 oil samples (1 from each capacitor). —tmb
- 2 soil samples (in area of each capacitor). —tmb

OSC Dollhopf suggests sampling in level B + avoiding contact with oil, puncture capacitors to sample, + then properly overpack them + mark with stakes where they were located + location of soil samples. SAPM Dieckhaus says that they will complete these tasks this week. OSC Dollhopf says oil + soil samples should be analyzed for PCBs within 1 week (or sooner if not expensive).

1135 End conversation. —tmb

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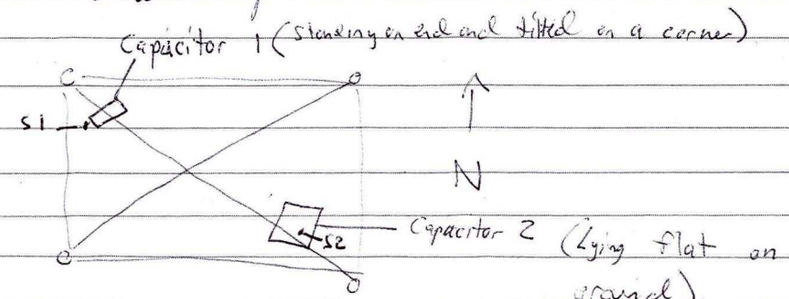
1149 START Ms Ramaly and Dieckhaus arrive at site. START Begins photo and video documenting 2 capacitors located beneath power line tower. MR



MR

1235 START Ramaly and Dieckhaus suit up Level B and begin sampling capacitors #1 + #2 and associated soil samples. START Dieckhaus observes that no oil is left in either capacitor. START Ramaly was able to obtain soil samples from visibly stained areas around each capacitor. MR

1340 START Ramaly and Dieckhaus doss down to level D and continue photo + video documentation. MR

Backnote: START Dieckhaus placed the 2 capacitors and grossly contaminated PPE into a lined 30 Gal Drum and labeled (PCBs). This drum will be left onsite ~~and~~ MR MR

1419 START Ramaly + Dieckhaus left site for the day. MR

Note: START Ramaly observes that the site is readily accessible. The North and South sides are without fencing and completely open. The south side has partial fencing and the south side of building #1 but Building #1 is accessible through an open doorway. The site is bordered to the east by a large commercial business and complete chain-link fence the west side has chain-link fencing but has several gaps allowing access.

Mark Ram 2/6/98

2/9/98 Michcon H S05-9801-020

0815 A meeting regarding the Mich Con H site was held at EPA's office in Grosse Ile. In attendance were OSC Dellhopf, Section Chief EL Zein, START Ramaly and Representatives from Mich Con. Mich Con representatives were Abed Houssari, Manager Environmental Engineering Laboratory Services, and Eric Lee Senior Environmental Engineer. MR

Eric Lee is the Project Manager for the site and Abed Houssari reports directly to the Vice President. Mr. Houssari stated that Mich Con has 16 MGP sites in Michigan and since ~1983 have been investigating sites in detroit near the river. In 1984/85 Mich Con allocated funds to investigate and remediate sites. In 1985 Mich Con conducted a site investigation and looked at Air Issues, Soils, Subsurface and Groundwater. The report showed no imminent threat to the environment but some areas of concern. Mr Houssari stated that Mich Con had alotted 1.2 Million dollars to clean up the site but the state would not approve any proposed actions. Mr Houssari expressed concerns for difficulties. Main problems lie in the fact that Mich Con does not own the site. Proposed remedies may not be suitable to current owners. MR

Mich Con representatives stated Mich Con realizes the site is used as an illegal dump. Mich Con hasn't been at the site in ~45 years. Following Mich Con the site was owned by American Charcoal company and then a Scrap Metal operation. The site reverted to the state and is currently owned by the City of Detroit (11/97). MR

Mich Con still owns a small parcel of the property along the CSX RR tracks. MR

Mr. Houssari does not think any Mich Con Coal tar is onsite. Only large facilities stockpiled it onsite. Mich Con reps agreed that an investigation needs to be conducted but Mich Con will not accept responsibility for dumped materials. Once the surface would be cleaned, Mich Con would address the site. Mich Con has notified the state that wastes + piles onsite are not Mich Con waste or not Mich Con responsibility.

Mark Ram

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Mich Con Representatives indicated that ancillary piping from their station may still be underground. ~~and~~ — MR

0850 Group viewed video footage from the initial START site walk

0900 OSC Dellhopf presented some possible perspectives. Informed Mich Con that although the State or City may own the site so long as environmental problems exist dumping is likely to continue. One perspective may be that if Michcon and subsequent owners had done something about the dumping, the problems would not exist. Mr. Haussmann stated Mich Con's probable position. Mich Con will not accept the responsibility of other owners or business. — MR

~0910 Mich Con representatives stated that Mich Con would like to know the end use of the property before considering action. Mich Con would like to work with the EPA/STATE/CITY to find an ultimate use, ~~and that~~ MR A real development plan to limit future dumping would "open the door" for Mich Con considering action. The more concrete the plan the better.

~0920 Jason Elzein indicated that it may be possible for Mich Con to sign a Protective agreement barring EPA to sue Mich Con after they cleanup the site. — MR

A meeting will be held 1000 hours 2/13/98 @ EPA with State, City officials. At least one Mich Con representative will attend. — MR

0930 Meeting completed. — MR

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0950 - START Ramaly arrived at EPA offices in Grosse Ile.

1010 - OSC Dellhopf conducted a meeting with representatives from Michcon, City of Detroit, and the MDEQ. In attendance were: Ralph Dellhopf, EPA; Jason El-Zein, EPA; Carol Graczer-Repski, EPA Enforcement; Ross Powers, City of Detroit; Ed Novak, MDEQ; Mary Vanderlaan, MDEQ; and Mark Ramaly, START/Ete. Meeting began with OSC Dellhopf giving brief discussion of START/EPA involvement at the site. Explained soil sample results (10000 ppm @ C-1) and (ND at C-2). — MR

1015 - Eric Lee, Project Manager for Michcon was present and stated Michcon's position. In 12/97 Michcon was requested be MDEQ or Detroit to conduct voluntary assessment activities. Michcon responded with a letter listing pertinent issues. Michcon hasn't been onsite in 51 years and there were other owners since then. Michcon will not accept liability for the illegal dumping but will for any contamination from MGP operations. Michcon wants to be assured that once site closure has occurred that any future dumping will not ~~be~~ put liability on Michcon. — MR

1030 - Mary Vanderlaan, MDEQ agreed that surface debris + materials must be addressed and state had slotted $ but was scheduled for action in 1999. The site is listed on Part 201 list. She also agreed that the future use and zoning will be imperative in order to address the site. — MR

- Ross Powers, Detroit states that the site is probably zoned industrial but is not aware of any developer interests. In the past Allwaste was interested in the property to use it as a Truck parking lot. If the site is cleaned up and closed industrial it may go under either Generic cleanup criteria ~~and~~ or limited requirements. If limited then deed restrictions will need to be implemented.
- ~~AA~~ OSC Dellhopf has inquired about A&A Scrap and American Charcoal Company. American Charcoal is now part of an active business and was purchase. The two PRPs will be pursued. Also EPA has assigned an attorney for Brownfields Prospective Purchasing Agreements (Mike Anastazio)
- OSC Dellhopf informed Michcon that a governmental response will most

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likely be to perform a cleanup of drums and capacitors. It could be a PRP funded or CERCLA. Proposed under AOC that Michcon perform an EE/CA on MGP issues on site with a commitment to cleanup the site to either Generic or Limited Industrial requirements and for future re-use. If EPA takes lead in the surface cleanup EPA could not assure Michcon that no liability will be put on Michcon. If waste or problems are encountered consistant with or found to relate to MGP operations or Michcon then they are ~~liability~~ (MR) liable as well. MR

- Michcon inquired if anything could be done to quickly cleanup nonhaz debris or demo the building. MDEQ Vanderlaan stated that MDEQ did a limited drum removal recently to remove drums from the buildings so that the city could do demolition. MR
- Ross Powers suggested that in order to search for interested buyers, many vacant lots are nearby and may be able to include this lot in a Purchaser Agreement. MR

OSC Dollhopf reiterated probable route of action. Under an AOC, Michcon will prepare to conduct an EE/CA and will be committed to conduct actions to address problems identified by that EE/CA. EPA will continue to pursue other PRPs to address the surface waste + debris issues. EPA would give Michcon a covenant not to sue after AOC completed. MDEQ would have to arrange a (MR) seperate covenant. MR

- Carol Graczer-Rolpski indicated that a draft AOC will be written and Michcon will be able to negotiate with it. MR

Before the meeting was concluded tentative ~~site~~ (MR) project tasks were scheduled. EPA enforcement will send Michcon a draft AOC boiler plate and formal notice of liability by ~ 1st week in 3/98. Ross Powers will be contacting Allwaste to determine interest then contact the City's ~~Planning~~ (MR) planning + development department to either work w/ Allwaste or find out about other planning initiatives for the site. Also, city will try to accellerate schedule for building demolition and debris cleanup. MR

EPA will try to get a civil investigator to check out A+A Scrap +

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American Charcoal as PRPs. Also to evaluate property next to expansion spur. EPA will have PRP + title search information by early March.

- Mary Vanderlaan explained how the state would approve closure.
  1. A Remedial Action Plan needs to be developed + approved.
  2. Conduct work outlined in RAP.
  3. A completion letter will be issued.
  4. The site will be open for public comment.
  5. Closure established and taken from 201 list.

* The EE/CA may pose as the RAP.

The next meeting was scheduled for the week ending 3/14/98.

~~1140~~ START Ramsey speaks with OSC Dollhopf. He would like a letter report in ~ 2 weeks (draft) and doesn't forsee any more site visits under the current TDD. MR

Note: Directions in the logs have been in error. ~~North is~~ what was north is now Northeast. All other directions can follow from that. MR

March Ramsey 2/13/98