From:	Peaceman, Karen
To:	Monsen, Dawn M.
Cc:	Nightingale, Elizabeth; McIntyre, Cheryl
Subject:	RE: Alreco Metals Site, Benton Harbor, Michigan
Date:	Wednesday, August 20, 2014 2:57:48 PM
Attachments:	Alreco ARAR Request.pdf Alreco ARARs Response.pdf Alreco-Reid Gp Response Ltr.pdf mdeq referral AR 28 pages.pdf

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Dawn,

In response to your request:

- The complete Baseline Environmental Assessment, submitted by AARES dated May 27, 1997. The copy provided was missing a number of pages and the enclosures. The pdf of the BEA that I sent you was the entire electronic file I received from MDEQ. I will reach out to them to see if they have additional pages.
- From Attachment 2 to EPA's Action Memorandum, complete copies of the following Administrative Record numbers:
  - 10 - 3/31/14 - MDEQ Initial Referral Email Chain, 28 pages --I believe I have already forward this to you, but I am attaching it again to be sure.
  - 12 - 4/17/14 - Letter re Violation Notice re 900 Alreco Property – Attached.
  - 13 - 6/9/14 - Site Assessment Report for the Alreco Metals Site, 1111 pages. The copy provided was incomplete. I have already sent the Site Assessment report minus the lab analysis files. If you want the lab analysis, it is too big to send electronically and I don't believe I can send that outside the FOIA (fee) process.
  - 15 - 7/14/14 - Letter re US EPA Request to Identify ARARs for the Alreco Site. Attached.
  - 16 - 7/14/14 - Letter re: ARARs identified by MDEQ Attached.

Please let me know if you would like to set up a time to discuss this matter further.

Karen L. Peaceman
Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd., Mail Code C-14J
Chicago, IL 60604
312-353-5751

From: Monsen, Dawn M. [mailto:dawn.monsen@klgates.com]
Sent: Wednesday, August 20, 2014 11:19 AM
To: Peaceman, Karen
Subject: RE: Alreco Metals Site, Benton Harbor, Michigan

Karen,

In follow-up to our discussion last Thursday and the below, can you please provide:

- The complete Baseline Environmental Assessment, submitted by AARES dated May 27, 1997. The copy provided was missing a number of pages and the enclosures.
- From Attachment 2 to EPA's Action Memorandum, complete copies of the following Administrative Record numbers:
  - 10 - 3/31/14 - MDEQ Initial Referral Email Chain, 28 pages
  - 12 - 4/17/14 - Letter re Violation Notice re 900 Alreco Property
  - 13 - 6/9/14 - Site Assessment Report for the Alreco Metals Site, 1111 pages. The copy provided was incomplete.
  - 15 - 7/14/14 - Letter re US EPA Request to Identify ARARs for the Alreco Site
  - 16 - 7/14/14 - Letter re: ARARs identified by MDEQ

Thanks,
Dawn

From: Peaceman, Karen [mailto:Peaceman.Karen@epa.gov]
Sent: Thursday, August 14, 2014 5:24 PM
To: Monsen, Dawn M.; Harvey, Sanford W. (EXTERNAL)
Cc: Nightingale, Elizabeth; McIntyre, Cheryl
Subject: RE: Alreco Metals Site, Benton Harbor, Michigan

Dawn,

I pushed "send" too quickly. Here are some more files. Let's touch base after you have had a chance to review these documents. We can talk through what additional information you are interested in.

Karen L. Peaceman
Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd., Mail Code C-14J
Chicago, IL 60604
312-353-5751

From: Peaceman, Karen
Sent: Thursday, August 14, 2014 11:43 AM
To: 'Monsen, Dawn M.'; Harvey, Sanford W. (EXTERNAL)
Cc: Nightingale, Elizabeth; McIntyre, Cheryl
Subject: RE: Alreco Metals Site, Benton Harbor, Michigan

Dawn,

How about 3 pm CST? Thanks.

Karen L. Peaceman

Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd., Mail Code C-14J
Chicago, IL 60604
312-353-5751

From: Monsen, Dawn M. [mailto:dawn.monsen@klgates.com]
Sent: Thursday, August 14, 2014 9:12 AM
To: Peaceman, Karen; Harvey, Sanford W. (EXTERNAL)
Cc: Nightingale, Elizabeth; McIntyre, Cheryl
Subject: RE: Alreco Metals Site, Benton Harbor, Michigan

Karen,

Thank you. Yes, I am available today after 1:00 pm EDT. Please let me know what time would work for you, and I can call you then.

Thanks,
Dawn

From: Peaceman, Karen [mailto:Peaceman.Karen@epa.gov]
Sent: Wednesday, August 13, 2014 4:18 PM
To: Monsen, Dawn M.; Harvey, Sanford W. (EXTERNAL)
Cc: Nightingale, Elizabeth; McIntyre, Cheryl
Subject: RE: Alreco Metals Site, Benton Harbor, Michigan

Dawn and Sanford,

Attached please find the Action Memorandum in the Alreco Metals as I promised. This was finalized last Friday and I only just received the scan of the final. I have the copy of the FOIA request you provided in your August 11, 2014 letter, but I have not yet seen the FOIA routed internally at EPA.

I would like to see if we can find a time to discuss this matter further so that we can expedite getting releasable, appropriate information to you. Is there a time tomorrow that would work?

Karen L. Peaceman
Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd., Mail Code C-14J
Chicago, IL 60604
312-353-5751

From: Monsen, Dawn M. [mailto:dawn.monsen@klgates.com]
Sent: Monday, August 11, 2014 4:41 PM
To: Peaceman, Karen
Subject: Alreco Metals Site, Benton Harbor, Michigan

Karen,

Please see the attached letter on behalf of Reynolds Metals Company in relation to the above site, which is being sent to Cheryl McIntyre via overnight mail.

Regards,
Dawn

Dawn M. Monsen, Esq.
K&L Gates LLP
One Newark Center, 10th Floor
Newark, New Jersey 07102
Phone: +1.973.848.4148
Fax: +1.973.848.4001
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www.klgates.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
9311 GROH ROAD
GROSSE ILE, MI 48138

July 7, 2014

Michael Baranoski
Environmental Quality Analyst
Michigan Department of Environmental Quality
Remediation Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009

Mr. Baranoski:

This letter requests that the Michigan department of Environmental Quality identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for a proposed removal action to take place at the Alreco metals site (site) located at 900 Alreco Road, Benton Harbor, Berrien County, MI 49022. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The United States Environmental Protection Agency (EPA) is proposing to fund a time-critical removal action to remove hazardous substances from the site. Laboratory analysis of samples collected during the site investigation indicates that hazardous substances exist at the site in an uncontrolled manner. Upon approval of an Action Memorandum, EPA plans to characterize, consolidate and properly dispose of these wastes.

Federal ARARs for this site primarily include the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 101 (14), CERCLA 121 (d)(3), 40 CFR 262.11, 40 CFR 300.440, and 40 CFR 300.415 (2). Some of the wastes being dealt with are RCRA characteristic wastes, and they will be handled accordingly. Wastes will be transported to and disposed of at an acceptable treatment, storage, and disposal facility pursuant to the EPA Off-Site Rule.

If you have any questions regarding this request, or require more detailed information concerning the site, please contact me at (734) 770-8402.

Sincerely,

Betsy Nightingale
U.S. EPA, On-Scene Coordinator

cc: File

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

July 7, 2014

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
9311 Groh Road
Grosse Ile, MI 48138

Dear Ms. Nightingale:

SUBJECT: State Applicable and Relevant and Appropriate Requirements (ARARs) for the Alreco Metals (Tobian Metals) Site, Benton Harbor, Berrien County

Per your request in the email dated July 7 for identification of all Applicable, Relevant and Appropriate Requirements (ARARs) for the potential upcoming removal actions at the Alreco Metals (Tobian Metals) site in Benton Harbor, I have compiled a listing for your attention.

REGULATORY REQUIREMENTS

1.01 APPLICABLE CODES

The Contractor shall comply with all State rules, ordinances and regulations relating to buildings, employment, the preservation of public health and safety, and so forth. All necessary permits or certificates of inspection shall be paid for and obtained by the Contractor.

1.02 APPLICABLE REGULATIONS

All applicable federal, state and local laws, ordinances, rules and regulations, are deemed to be included herein the same as though written in full. The Contractor shall comply with all authorities having jurisdiction over the work. The following list of regulations which may be applicable to site activities and off-site transportation and disposal. All regulations listed shall be as amended.

A. Federal Regulations
   1. Asbestos abatement in accordance with:
      a. Title II of Toxic Substances Control Act of 1979 (TSCA)
      b. Asbestos Hazard Emergency Response Act (AHERA)
      c. Asbestos School Hazard Abatement Reauthorization Act (ASHARA)
      d. National Emission Standards for Asbestos (40 CFR 61, Subpart M)
      e. Asbestos Abatement Regulations (40 CFR 763)
   2. Disposal of hazardous wastes including land disposal restricted wastes at treatment and disposal facilities that are appropriately permitted in accordance with:

a. Resource Conservation and Recovery Act of 1976 (RCRA)
   (1) Identification and Listing of Hazardous Wastes (40 CFR 261)
   (2) Generator Standards (40 CFR 262)
   (3) Transporter Standards (40 CFR 263)
   (4) TSDF Standards (40 CFR 264)
   (5) RCRA Land Disposal Restrictions (40 CFR 268)
   (6) Hazardous Waste Permit Program (40 CFR 270)

b. Toxic Substances Control Act of 1979 (TSCA)
   (1) PCB Manufacturing, Processing, Distribution, and Use Prohibitions (40 CFR 761)
   (2) PCB Remediation Waste (40 CFR 761.61)

c. Compliance with the United States Environmental Protection Agency's (USEPA's) off-site disposal policy. Prior to Shipment of wastes to any facility, provide evidence of the Owner that the facility has been inspected in accordance with the requirements of RCRA within the prior six-month period and found to be in compliance as required y USEPA's off-site disposal policy.

3. Transport waste in accordance with:
   a. All applicable U.S. Dept. of Transportation rules and regulations
   b. USEPA rule and regulations including:
      (1) Hazardous Waste Management Systems (40 CFR 260)
      (2) Standards Applicable to Generators (40 CFR 262)
      (3) Standards Applicable to Transporters of Hazardous Wastes (40 CFR 263)
   c. Polychlorinated Biphenyls (PCB) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions
   d. United States Department of Labor (USDOL) Occupational Safety and Health Standards (29 CFR 1910)
   e. U.S. DOT Hazardous Material Regulations (49 CFR Subchapter C, Parts 171-177)
   f. U.S. DOT Container Specifications (49 CFR 178-179)

4. Conduct all site work in accordance with the contractors site-specific Health and Safety Plan and applicable federal regulations
   a. USDOL Occupational Safety and Health Standards (29 CFR 1910, 1926).
   b. USEPA Hazardous Waste Management Systems (40 CFR 260)
   c. Standards Applicable to Generators of Hazardous Waste (40 CFR 262).
   d. Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (40 CFR 264) and National Emission Standards for Asbestos (subpart M of 40 CFR 61).

B. <u>State Regulations</u>
   1. Public Act No. 154 of 1954, Occupational Safety and Health Act, as amended
   2. Public Act No. 299 of 1980, Occupational Code, as amended

3. Public Act No. 451 of 1994, Natural Resources and Environmental Protection Act, as amended to include but not be limited to:
   a. Part 17 of Public Act No. 451 of 1994, Michigan Environmental Protection Act
   b. Part 31 of Public Act No. 451 of 1994, Water Resources Protection
   c. Part 55 of Public Act No. 451 of 1994, Air Pollution Control
   d. Part 91 of Public Act No. 451 of 1994, Soil Erosion and Sedimentation Control
   e. Part 111 of Public Act No. 451 of 1994, Hazardous Waste Management
      (1) Disposal of all wastes must comply with all intercounty waste management plans.
      (2) Treatment of wastes through states other than Michigan shall be in compliance with all applicable requirements of those states.
   f. Part 115 of Public Act No. 451 of 1994, Solid Waste Management
      (1) Disposal of all wastes must comply with all intercounty waste management plans.
      (2) Treatment of wastes through states other than Michigan shall be in compliance with all applicable requirements of those states.
   g. Part 121 of Public Act No. 451 of 1994, Liquid Industrial Wastes
   h. Part 147 of Public Act No. 451 of 1994, PCB Compounds
   i. Part 201 of Public Act No. 451 of 1994, Environmental Response
   j. Part 211 of Public Act No. 451 of 1994, Underground Storage Tank Regulations
   k. Part 213 of Public Act No. 451 of 1994, Leaking Underground Storage Tanks
4. Act 207 of the Public Acts of 1941, Section 3c, State of Michigan Fire Safety Board Rules, Underground Storage Tank Systems, Storage of Flammable and Combustible Liquids, being Section 29.3c of the Michigan Compiled Laws, as amended.
5. Act 423 of the Public Acts of 1984, Sections 2 and 7, being Sections 29.3c, 299.702, and 299.707 of the Michigan Compiled Laws, as amended.
6. Disposal shall be in compliance with Administrative Circular 36A (Appendix G).
7. Transportation, traffic control, etc. shall be in compliance with 1990 Standard Specifications for Construction, Michigan Department of Transportation, as amended.
8. Public Act No. 135 of 1986, Asbestos Abatement Contractor Licensing.

C. <u>Local Requirements</u>
   1. Ascertain and comply with all applicable county and municipal ordinances, codes, rules, and regulations and obtain all required permits including seasonal load limits, which may be imposed to cover transportation on certain roads.

D. Other Codes, Standards, and Guidance Documents

1. In addition to regulatory requirements, the Contractor shall follow the codes, standards, and guidance documents cited in other of these specifications such as, but not limited to, API Recommended Practices, EPA Guidance Documents, Michigan State Memos and Administrative Circulars, and ASTM Standards.
2. Other national codes which the Contractor shall comply with for all site work that are not specifically cited in other sections include:
   a. BOCA-Building Officials and Code Administrators-"Basic Building Code".
   b. AGC-Associated General Contractors of America-"Manual of Accident Prevention in Construction".
   c. NEC-National Electrical Code.

If I can provide any additional information, please contact me. I appreciate your assistance and look forward to the upcoming remediation events on this property.

Sincerely,

Michael Baranoski, Senior Project Manager
Remediation and Redevelopment Division
Kalamazoo District Office
269-567-3524
baranoskim@michigan.gov

RECEIVED
APR 17 2014
WATER RESOURCES DIVISION

THE REID GROUP, LLC
P.O. BOX 8711
GRAND RAPIDS, MI 49518

April 16, 2014

Janelle Hohm
Mike Baranoski
State of Michigan DEQ
Kalamazoo District Office

SUBJECT: Violation Notice VN-005793

The plan and timeframe to remediate and correct the Violations on Violation VN-005793 are as follows:

1. a. Tarps and impermeable covers, as necessary, are being used to cover all exposed ash piles and will be completed by April 30, 2014.
   b. Catch Basins Inserts and Cover Plates for Catch Basins are being placed in and on Basins to prevent ash from reaching waters of the state. : Catch Basins are being Custom Made and will be completed By ENPAC in 2-3 weeks, approximately May 9. In the meantime metal covers will be placed over the Critical Drain Areas.

2. The Catch Basin Inserts are being ordered from Graingers and custom made by ENPAC LLC of Eastlake Ohio. The Catch Basin Inserts are designed for Trash, Sediments, Debris, Oils, & Hydrocarbons. The Catch Basins will be monitored and checked after storms, heavy rains and checked on a regular basis. The Critical Drains will be covered with metal until the Catch Basins are completed by ENPAC.

   Due to inadequate financing the Reid Group as well as myself will need a period of time through September 30, 2014 to remove and remediate the total amount of ash, bag house waste and Significant Materials from the Site. During this removal period the Materials will be Covered and Stored in Contained areas to prevent Contamination to the Environment and Water Pollutions.

   I am in process of obtaining financing to help expedite and complete our plans for the Facility.

3. Today, April 16, 2014 I attended the Industrial Storm Water Training Session given by Ryan Grant in Grand Rapids, Michigan.

Thanks for your cooperation and rest assured we will comply to all DEQ Regulations and Requirements.

Regards,
Dorie Reid, Sr Manager
The Reid Group, LLC

Enc. Copy of Purchase Order For Drain Catch Basin Inserts.

Nightingale, Elizabeth

From: Ballo, Frank (DEQ) [BALLOF@michigan.gov]
Sent: Monday, March 31, 2014 10:07 AM
To: Nightingale, Elizabeth
Cc: Clements, Mindy; Baranoski, Michael (DEQ); Bennett, Bree (DEQ)
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Thanks, Betsy. The company is no longer operating on the property, so our previous contact information no longer works. We have an old cell phone number for the principal of the company, Dorie Reid, of 616-299-8904. I've called the number and left messages, but haven't received a call back. Mike Baranoski (269-567-3524, baranoskim@michigan.gov) is our project manager for this.

At this point we'd like to refer it to EPA. Give Mike a call to see to see if the two of you can schedule a site visit, and in the interim we'll see if we can glean any additional information on the company/principal.

Thanks again, and contact Mike or me if you have any questions.

--Frank

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, March 31, 2014 8:46 AM
To: Ballo, Frank (DEQ)
Cc: Clements, Mindy
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Hi Frank,

We can absolutely take a look at it. Is it at the point where you would like to refer it to EPA, and have us do an assessment, or are you still looking into options? I'm in Ohio this week, but will be around some of next week and the following week if you would like to schedule a site visit.

Do you happen to have a phone number for the current owner or their attorney?

My cell is 734-770-8402.

Betsy

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
9311 Groh Road
Grosse Ile, MI 48138

office: 734-692-7665
cell: 734-770-8402
fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Kimble, Jeffrey
Sent: Friday, March 28, 2014 4:16 PM
To: Clements, Mindy; Ballo, Frank (DEQ)

Cc: Edwards, Tricia; Nightingale, Elizabeth
Subject: Fw: Potential Site Candidate for EPA Time Critical Response

Thanks Frank, as much as I'd love to do another site right now, I won't get any assigned to me until EPA is done at the Enbridge site in Marshall and Kalamazoo, hopefully this fall. I am forwarding this to my supervisor so she can assign it and cc'in a couple coworkers who I know don't have as many sites as others in our office. Thanks and feel free to call me or Mindy with questions.

Thanks for the referral.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ballo, Frank (DEQ) <BALLOF@michigan.gov>
Sent: Friday, March 28, 2014 10:21 AM
To: Kimble, Jeffrey
Cc: Wagner, Robert (DEQ); Erickson, Susan (DEQ); Eagle, Dennis (DEQ)
Subject: Potential Site Candidate for EPA Time Critical Response

Good morning, Jeff, hope you're doing well.

We have a site that was a former secondary aluminum processor called Alreco Metals, Site ID 11000336 (aka Tobian Metals, aka Ace Companies, aka Harbor Light Metals), 900 Alreco Drive, Benton Harbor, Berrien County. Tax records indicate the current property owner is the Reid Group, LLC, P.O. Box 8711, Grand Rapids, MI 49518. Our understanding is the company has either gone through or is going through bankruptcy, and recently someone has been salvaging/demolishing the building. A recent site visit by one of our Air Quality Division staff documented the current state of the building and confirmed large piles of gray aluminum dross now exposed to the elements and the environment (attached). The site is immediately adjacent to wetlands and approximately 200 feet from the Paw Paw River (Google link below). Given the potential nature of dross (Alcoa link below), we're understandably concerned.

We're still gathering information on the situation and haven't been in contact with a company representative, but I thought I'd contact you to see if this is something EPA might take a look at.

Thanks very much, and let me know if you've got questions or need additional information.

Frank

Frank Ballo, District Supervisor
Department of Environmental Quality
Remediation and Redevelopment Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-5025

Phone: 269-567-3531
Fax: 269-567-9440
Email: ballof@michigan.gov

https://maps.google.com/maps?q=900+alreco+drive,+benton+harbor+mi&hl=en&geocode=+&hnear=900+Alreco+Rd,+Benton+Harbor,+Michigan+49022&t=h&z=16

http://www.alcoa.com/global/en/environment/msds_view.asp?LoadMSDS=184498

Nightingale, Elizabeth

From: Baranoski, Michael (DEQ) [BARANOSKIM@michigan.gov]
Sent: Monday, March 31, 2014 12:04 PM
To: Nightingale, Elizabeth
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)
Attachments: Aco Co LLC Post-Inspection Report_163577_v1.doc; Ace Co LLC Compliance Communication_163584_v2.doc

Hi Elizabeth, Frank Ballo just put me in contact with the property owner. He claims he will address the dross on site and I plan on meeting him on site tomorrow to discuss his intentions. I will get contact information from him when I meet him, and hopefully his intentions to clean up this mess will be acceptable. I will let you know what I find out.

Best regards and we appreciate you quick reply to this. We were not sure that we could find a contact for this site. I plan to use a potential EPA response and cost recovery as a lever to encourage a rapid response by the property owner.

Mike

Michael Baranoski
Environmental Quality Analyst
Michigan Department of Environmental Quality
Remediation Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
Phone (269)567-3524
FAX (269)567-9440
Email: baranoskim@michigan.gov

From: Baranoski, Michael (DEQ)
Sent: Monday, March 31, 2014 11:44 AM
To: Deskins, Matthew (DEQ)
Cc: 'Hohm, Janelle (DEQ)'
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Hi Matt, I spoke with Mr. Reid, the property owner this morning and plan to meet him on site tomorrow. He stated that the building had collapsed (hence the demolition you saw) and that he thinks he can have

the dross recycled, but he needs to make arrangements to haul this stuff and bring equipment to the site.

He plans to cover the dross with tarps to prevent it from becoming airborne and to prevent rainwater from soaking it. Do you see any problems with this in the short term? Thanks much, Mike

Michael Baranoski
Environmental Quality Analyst
Michigan Department of Environmental Quality
Remediation Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
Phone (269)567-3524
FAX (269)567-9440
Email: baranoskim@michigan.gov

From: Ballo, Frank (DEQ)
Sent: Monday, March 31, 2014 11:32 AM
To: Hohm, Janelle (DEQ); Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ)
Cc: Spagnoli, Robert (DEQ); Deskins, Matthew (DEQ); Sellers, Fred (DEQ); Baranoski, Michael (DEQ)
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

We received a call back from the principal of the company, Dorie Reid, and Mike Baranoski scheduled a meeting with him at the site tomorrow. Mike, note the WRD issues below and attached. This may end up being a multi-media response, Mike will be following up with the other divisions. We still have EPA in our back pocket if Reid cannot/will not mount a timely response.

From: Hohm, Janelle (DEQ)
Sent: Monday, March 31, 2014 11:22 AM
To: Ballo, Frank (DEQ); Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ)
Cc: Spagnoli, Robert (DEQ)
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

I am looking through the file and records in NMS to try to figure out if the site has storm sewers. The common theme among all of the inspection reports is that "the facility site map needs to include more detail regarding the storm water flow throughout the site and the outfalls which will receive storm water from various areas of the site."

There was definitely a discharge from the site to waters of the state. In 2007, the certified operator responded (to Steve Lewis' letter) that he was amending the facility site map, with a date of completion of May 18, 2007. It looks like this revised map was never submitted to DEQ. When the site was inspected again by Bob Spagnoli in 2010, the certified operator had left, and all of the files were gone.

There is a map in DEQ's file, which does not include catch basins or storm water flows. There are some hand markings, which appear to be Bob's. I'm giving the file to Bob, and hopefully he can shed some light on this. There were exposure issues at the time of Bob's inspection, and a letter and report were sent. The company never responded. I will forward those documents in a separate e-mail, directly from NMS.

The industrial storm water permit expired on April 1, 2013. I called the company last year to follow up, and the call did not go through. Since it appeared the facility had ceased operations and would therefore no longer need an ISW permit, DEQ had not followed up further.

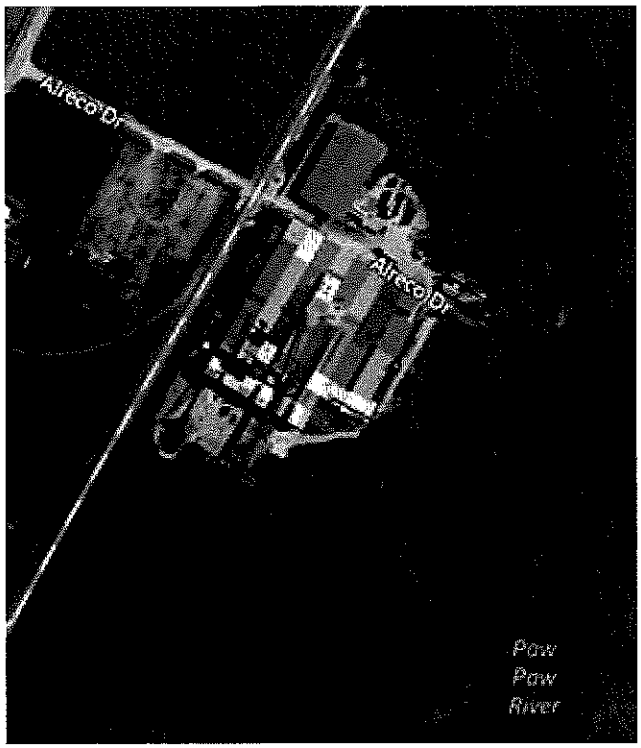
From the photos, this looks like an urgent situation. DEQ should have followed up further back in 2010, although at that point the worst issues were inside the buildings (which were already in disrepair), not the outside exposures to storm waters. I remember Bob showing me the photos and discussing this with me, but I can't remember what happened afterwards (e.g. if we informed someone in Waste or RRD).

Photos from inspections are in NMS, designated name is Ace Co LLC.

Janelle Hohm
Water Resources Division
Michigan Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009
269-567-3581

From: Ballo, Frank (DEQ)
Sent: Friday, March 28, 2014 9:04 AM
To: Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ); Hohm, Janelle (DEQ)
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)
Importance: High

Good morning, WRD! I'm wondering if you know whether this facility, which looks like it's immediately adjacent to wetlands and about 200 feet from the Paw Paw River, has storm sewer(s)?



From: Deskins, Matthew (DEQ)
Sent: Thursday, March 27, 2014 9:41 AM
To: Ballo, Frank (DEQ); Baranoski, Michael (DEQ); Venechuk, Katie (DEQ); Sellers, Fred (DEQ)

Cc: Douglas, Mary (DEQ)
Subject: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Hi Everyone,

I was out in the field yesterday and went by an old facility of mine (Ace Companies d.b.a. Harbor Light Metals) that I use to inspect but has been closed since June of 2010. I noticed that someone has been doing building demolition and scrapping activities. The facility/location has always processed Secondary Aluminum and is located at 900 Alreco Road, Benton Harbor, Berrien County and at one time was Tobian Metals, Alreco Metals, etc. I don't know the current ownership situation because they've been going through bankruptcy proceedings for a number of years but it was last owned by a man named Dorie Reid. No one was at the site during my visit but the neighbor across the road (Padnos Iron and Metal Recycling) said that Randy's Recycling had been recycling some material and that RJ Torching has been in there most recent. My main concern, besides potential asbestos notification issues, is all the leftover aluminum dross waste that is currently in concrete bins. By demolishing the building around them, the dross is now exposed to the elements which is why I wanted to make you guys aware of it. Frank and Mike, you may recall that Ace Companies received various brownfield monies/ grants to clean up the previous owners aluminum dross waste prior to them starting the plant up again. I think that was around 2005 and Prism was their consultant. I've attached some photos and please let me know if you have any questions. Thanks all.

Matt Deskins
Environmental Quality Analyst
Air Quality Division
MI Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
tel.: 269-567-3542; fax: 269-567-9440
e-mail: deskinsm@michigan.gov

DEQ Department of Environmental Quality

Nightingale, Elizabeth

From: Baranoski, Michael (DEQ) [BARANOSKIM@michigan.gov]
Sent: Tuesday, April 01, 2014 4:39 PM
To: Nightingale, Elizabeth
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)
Attachments: Aleris Benton Harbor 4-1-2014 (11).JPG; Aleris Benton Harbor 4-1-2014 (2).JPG; Aleris Benton Harbor 4-1-2014 (3).JPG; Aleris Benton Harbor 4-1-2014 (4).JPG; Aleris Benton Harbor 4-1-2014 (5).JPG; Aleris Benton Harbor 4-1-2014 (6).JPG; Aleris Benton Harbor 4-1-2014 (7).JPG; Aleris Benton Harbor 4-1-2014 (8).JPG; Aleris Benton Harbor 4-1-2014 (9).JPG; Aleris Benton Harbor 4-1-2014 (10).JPG

Hi Betsy,
I inspected the site and met with the property owner, Mr. Reid, this afternoon. Mr. Reid proposes to place tarps over the ash piles (more ash than dross) after he special orders the large tarps he will need (hopefully, 6-8 weeks?). He plans to remove the ash by the end of summer. There are a variety of other issues associated with this property. I have attached a link to some pictures taken at the site recently.

I am going to discuss this issue with the division supervisors as there are questions as to whether Mr. Reid has the resources to take care of the problems and respond to this problem in a timely manner.

I expect that

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Email: baranoskim@michigan.gov

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, March 31, 2014 12:07 PM
To: Baranoski, Michael (DEQ)
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Ok – sounds good. Please just let me know if you need any help from us.

Betsy

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
9311 Groh Road
Grosse Ile, MI 48138

office: 734-692-7665
cell: 734-770-8402
fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Baranoski, Michael (DEQ) [mailto:BARANOSKIM@michigan.gov]
Sent: Monday, March 31, 2014 12:04 PM
To: Nightingale, Elizabeth
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Hi Elizabeth, Frank Ballo just put me in contact with the property owner. He claims he will address the dross on site and I plan on meeting him on site tomorrow to discuss his intentions. I will get contact information from him when I meet him, and hopefully his intentions to clean up this mess will be acceptable. I will let you know what I find out.

Best regards and we appreciate you quick reply to this. We were not sure that we could find a contact for this site. I plan to use a potential EPA response and cost recovery as a lever to encourage a rapid response by the property owner.

Mike

Michael Baranoski
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Email: baranoskim@michigan.gov

From: Baranoski, Michael (DEQ)
Sent: Monday, March 31, 2014 11:44 AM

To: Deskins, Matthew (DEQ)
Cc: 'Hohm, Janelle (DEQ)'
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Hi Matt, I spoke with Mr. Reid, the property owner this morning and plan to meet him on site tomorrow. He stated that the building had collapsed (hence the demolition you saw) and that he thinks he can have the dross recycled, but he needs to make arrangements to haul this stuff and bring equipment to the site.

He plans to cover the dross with tarps to prevent it from becoming airborne and to prevent rainwater from soaking it. Do you see any problems with this in the short term? Thanks much, Mike

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Email: baranoskim@michigan.gov

From: Ballo, Frank (DEQ)
Sent: Monday, March 31, 2014 11:32 AM
To: Hohm, Janelle (DEQ); Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ)
Cc: Spagnoli, Robert (DEQ); Deskins, Matthew (DEQ); Sellers, Fred (DEQ); Baranoski, Michael (DEQ)
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

We received a call back from the principal of the company, Dorie Reid, and Mike Baranoski scheduled a meeting with him at the site tomorrow. Mike, note the WRD issues below and attached. This may end up being a multi-media response, Mike will be following up with the other divisions. We still have EPA in our back pocket if Reid cannot/will not mount a timely response.

From: Hohm, Janelle (DEQ)
Sent: Monday, March 31, 2014 11:22 AM
To: Ballo, Frank (DEQ); Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ)
Cc: Spagnoli, Robert (DEQ)
Subject: RE: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

I am looking through the file and records in NMS to try to figure out if the site has storm sewers. The common theme among all of the inspection reports is that "the facility site map needs to include more detail regarding the storm water flow throughout the site and the outfalls which will receive storm water from various areas of the site."

There was definitely a discharge from the site to waters of the state. In 2007, the certified operator responded (to Steve Lewis' letter) that he was amending the facility site map, with a date of completion of May 18, 2007. It looks like this revised map was never submitted to DEQ. When the site was inspected again by Bob Spagnoli in 2010, the certified operator had left, and all of the files were gone.

There is a map in DEQ's file, which does not include catch basins or storm water flows. There are some hand markings, which appear to be Bob's. I'm giving the file to Bob, and hopefully he can shed some light on this. There were exposure issues at the time of Bob's inspection, and a letter and report were sent. The company never responded. I will forward those documents in a separate e-mail, directly from NMS.

The industrial storm water permit expired on April 1, 2013. I called the company last year to follow up, and the call did not go through. Since it appeared the facility had ceased operations and would therefore no longer need an ISW permit, DEQ had not followed up further.

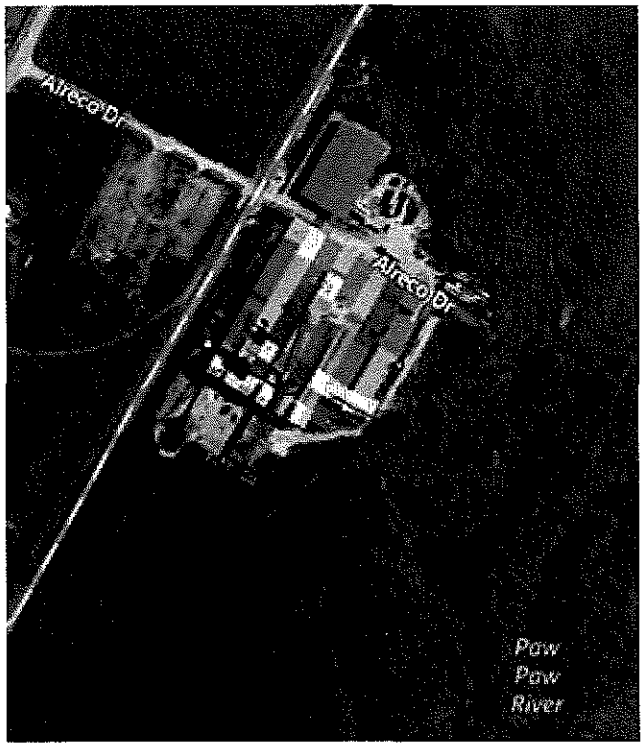
From the photos, this looks like an urgent situation. DEQ should have followed up further back in 2010, although at that point the worst issues were inside the buildings (which were already in disrepair), not the outside exposures to storm waters. I remember Bob showing me the photos and discussing this with me, but I can't remember what happened afterwards (e.g. if we informed someone in Waste or RRD).

Photos from inspections are in NMS, designated name is Ace Co LLC.

Janelle Hohm
Water Resources Division
Michigan Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009
269-567-3581

From: Ballo, Frank (DEQ)
Sent: Friday, March 28, 2014 9:04 AM
To: Jordan, Kameron (DEQ); Sanders, Jerrod (DEQ); Hohm, Janelle (DEQ)
Subject: FW: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)
Importance: High

Good morning, WRD! I'm wondering if you know whether this facility, which looks like it's immediately adjacent to wetlands and about 200 feet from the Paw Paw River, has storm sewer(s)?



From: Deskins, Matthew (DEQ)
Sent: Thursday, March 27, 2014 9:41 AM
To: Ballo, Frank (DEQ); Baranoski, Michael (DEQ); Venechuk, Katie (DEQ); Sellers, Fred (DEQ)
Cc: Douglas, Mary (DEQ)
Subject: Berrien County Site Demolition and Recycling (Ace Companies formerly known Tobian Metals, Alreco Metals)

Hi Everyone,

I was out in the field yesterday and went by an old facility of mine (Ace Companies d.b.a. Harbor Light Metals) that I use to inspect but has been closed since June of 2010. I noticed that someone has been doing building demolition and scrapping activities. The facility/location has always processed Secondary Aluminum and is located at 900 Alreco Road, Benton Harbor, Berrien County and at one time was Tobian Metals, Alreco Metals, etc. I don't know the current ownership situation because they've been going through bankruptcy proceedings for a number of years but it was last owned by a man named Dorie Reid. No one was at the site during my visit but the neighbor across the road (Padnos Iron and Metal Recycling) said that Randy's Recycling had been recycling some material and that RJ Torching has been in there most recent. My main concern, besides potential asbestos notification issues, is all the leftover aluminum dross waste that is currently in concrete bins. By demolishing the building around them, the dross is now exposed to the elements which is why I wanted to make you guys aware of it. Frank and Mike, you may recall that Ace Companies received various brownfield monies/ grants to clean up the previous owners aluminum dross waste prior to them starting the plant up again. I think that was around 2005 and Prism was their consultant. I've attached some photos and please let me know if you have any questions. Thanks all.

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Department of Environmental Quality

Nightingale, Elizabeth

From:	Baranoski, Michael (DEQ) [BARANOSKIM@michigan.gov]
Sent:	Monday, April 21, 2014 3:53 PM
To:	Nightingale, Elizabeth
Cc:	Ballo, Frank (DEQ); Heywood, David (DEQ); Hohm, Janelle (DEQ)
Subject:	RE: Alreco Metals, Request for Assistance
Attachments:	Alreco-Reid Gp Response Ltr.pdf; Alreco Benton Harbor 4-1-2014 (1).JPG; Alreco Benton Harbor 4-1-2014 (2).JPG; Alreco Benton Harbor 4-1-2014 (11).JPG; Alreco Benton Harbor 4-1-2014 (4).JPG; Alreco Benton Harbor 4-1-2014 (7).JPG; Alreco Benton Harbor 4-1-2014 (8).JPG; Alreco Benton Harbor 4-1-2014 (10).JPG; Aleris Benton Harbor 4-1-2014 (2).JPG

Hi Betsy, attached is a copy of the reply letter we received from Mr. Dorie Reid, the facility owner, along with some of the pictures I took on a site inspection we did at the beginning of the month. Mr. Reid proposes to attempt to attain financing to conduct the cleanup of the ash piles (about a 200 X 80 feet area about 8 feet high), many bags of bag house waste stored in a crumbling structure, and various drums, waste piles and miscellaneous debris scattered across the property. The site is adjacent to the floodplain of the Paw Paw River.

Mr. Reid proposes to secure the ash from becoming windborne with tarps (yet to be ordered) and to secure two of the many drains on the site. Because it is unclear that Mr. Reid will actually be able to obtain financing to conduct cleanup by September and if he is unable to do so, this waste will remain in place until at least next year, I think that a more timely response is probably warranted to address the waste stored here before it is either blown or washed onto the floodplain.

I would like to invite you to conduct a site inspection and would be happy to meet you on site at your earliest convenience. Contact information for the property owner is included below. I appreciate your assistance in this matter. Best regards, Mike

Michael Baranoski
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FAX (269)567-9440

Email: baranoskim@michigan.gov

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, March 31, 2014 11:48 AM
To: Baranoski, Michael (DEQ)
Subject: Alreco Metals

Hi Mike,

When would be a good time for you to schedule a site visit? Next week Monday and Tuesday are open for me. The following week M-W are best for me.

I need to try and get a federal access agreement signed by the landowner – so I'll look into that too. If you do uncover any landowner contact info if you wouldn't mind forwarding that I'd appreciate it.

Thanks!

Betsy

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
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office: 734-692-7665
cell: 734-770-8402
fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Ballo, Frank (DEQ) [mailto:BALLOF@michigan.gov]
Sent: Monday, March 31, 2014 10:07 AM
To: Nightingale, Elizabeth
Cc: Clements, Mindy; Baranoski, Michael (DEQ); Bennett, Bree (DEQ)
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Thanks, Betsy. The company is no longer operating on the property, so our previous contact information no longer works. We have an old cell phone number for the principal of the company, Dorie Reid, of 616-299-8904. I've called the number and left messages, but haven't received a call back. Mike Baranoski (269-567-3524, baranoskim@michigan.gov) is our project manager for this.

At this point we'd like to refer it to EPA. Give Mike a call to see to see if the two of you can schedule a site visit, and in the interim we'll see if we can glean any additional information on the company/principal.

Thanks again, and contact Mike or me if you have any questions.

--Frank

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, March 31, 2014 8:46 AM
To: Ballo, Frank (DEQ)

Cc: Clements, Mindy
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Hi Frank,

We can absolutely take a look at it. Is it at the point where you would like to refer it to EPA, and have us do an assessment, or are you still looking into options? I'm in Ohio this week, but will be around some of next week and the following week if you would like to schedule a site visit.

Do you happen to have a phone number for the current owner or their attorney?

My cell is 734-770-8402.

Betsy

Betsy Nightingale
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fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Kimble, Jeffrey
Sent: Friday, March 28, 2014 4:16 PM
To: Clements, Mindy; Ballo, Frank (DEQ)
Cc: Edwards, Tricia; Nightingale, Elizabeth
Subject: Fw: Potential Site Candidate for EPA Time Critical Response

Thanks Frank, as much as I'd love to do another site right now, I won't get any assigned to me until EPA is done at the Enbridge site in Marshall and Kalamazoo, hopefully this fall. I am forwarding this to my supervisor so she can assign it and cc'in a couple coworkers who I know don't have as many sites as others in our office. Thanks and feel free to call me or Mindy with questions.

Thanks for the referral.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ballo, Frank (DEQ) <BALLOF@michigan.gov>
Sent: Friday, March 28, 2014 10:21 AM
To: Kimble, Jeffrey
Cc: Wagner, Robert (DEQ); Erickson, Susan (DEQ); Eagle, Dennis (DEQ)
Subject: Potential Site Candidate for EPA Time Critical Response

Good morning, Jeff, hope you're doing well.

We have a site that was a former secondary aluminum processor called Alreco Metals, Site ID 11000336 (aka Tobian Metals, aka Ace Companies, aka Harbor Light Metals), 900 Alreco Drive, Benton Harbor, Berrien County. Tax records indicate the current property owner is the Reid Group, LLC, P.O. Box 8711, Grand Rapids, MI 49518. Our understanding is the company has either gone through or is going through bankruptcy, and recently someone has been salvaging/demolishing the building. A recent site visit by one of our Air Quality Division staff documented the current

state of the building and confirmed large piles of gray aluminum dross now exposed to the elements and the environment (attached). The site is immediately adjacent to wetlands and approximately 200 feet from the Paw Paw River (Google link below). Given the potential nature of dross (Alcoa link below), we're understandably concerned.

We're still gathering information on the situation and haven't been in contact with a company representative, but I thought I'd contact you to see if this is something EPA might take a look at.

Thanks very much, and let me know if you've got questions or need additional information.

Frank

Frank Ballo, District Supervisor
Department of Environmental Quality
Remediation and Redevelopment Division
Kalamazoo District Office
7953 Adobe Road
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Phone: 269-567-3531
Fax: 269-567-9440
Email: ballof@michigan.gov

https://maps.google.com/maps?q=900+alreco+drive,+benton+harbor+mi&hl=en&geocode=+&hnear=900+Alreco+Rd,+Benton+Harbor,+Michigan+49022&t=h&z=16

http://www.alcoa.com/global/en/environment/msds_view.asp?LoadMSDS=184498

Nightingale, Elizabeth

From: Baranoski, Michael (DEQ) [BARANOSKIM@michigan.gov]
Sent: Tuesday, April 22, 2014 2:41 PM
To: Nightingale, Elizabeth
Subject: RE: Alreco Metals, Request for Assistance

Here is a little site history for you from the MDEQ database:

This site was an aluminum smelting facility from 1965 to 1981. Secondary (recycled) aluminum smelting was conducted on the property from 1981-2001. In 1981, the Berrien County Circuit Court issued a consent order for site cleanup.

This plant was purchased by Reynolds Metals Company from Michigan Standard Alloys in 1981. It was refurbished for the reclamation of aluminum for the die cast industry in 1982 under the name ALRECO, a division of Reynolds Aluminum.

In 1983 Alreco conducted the removal of large amounts of aluminum dross disposed of along the Paw Paw River and restored the banks as part of the court-ordered response. Response activities were completed by 1988.

Tobian Metals acquired the property in 1997 and operated the smelter until 2001.

Several above ground petroleum storage tanks (250,000 gallon fuel oil, 2-500 gallon diesel, 1-500 gallon gasoline) were reported as abandoned containers in 1999 as part of a BEA and the prospective owner was to abandon these tanks. A release of petroleum to site soils was reported. The tanks were not abandoned.

An APC (approved partial closure) was approved for the site in 2001 in response to Part 201 issues at the site.

The Berrien County Brownfield Authority conducted a cleanup and due care response in 2005 that included the removal of dross, bag house dust, and an oil-water separator and drains, abandoned containers, and contaminated soils. It also repaired/replaced concrete and asphalt in the manufacturing building in preparation for redevelopment by Ace Companies, LLC.

Ace Companies, LLC (Harbor Light Metals) acquired the property and submitted a Notice of (contaminant) Migration as part of a BEA for the property in 2005. Permitting requirements of the AQD and WQD were not met by the owner between this time and 2010.

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Email: baranoskim@michigan.gov

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Tuesday, April 22, 2014 2:28 PM
To: Baranoski, Michael (DEQ)
Subject: RE: Alreco Metals, Request for Assistance

Huh – Interesting. Thanks for the background. It'll be interesting to see what is out there.

Betsy

Betsy Nightingale
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United States Environmental Protection Agency, Region 5
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email: nightingale.elizabeth@epa.gov

From: Baranoski, Michael (DEQ) [mailto:BARANOSKIM@michigan.gov]
Sent: Tuesday, April 22, 2014 10:50 AM
To: Nightingale, Elizabeth
Subject: RE: Alreco Metals, Request for Assistance

Hi Betsy, this material was mostly ash. There were "bales" of bag house dust stored in one building and exposed bags of white powder outside of another building. The property owner reported that most of the dross he generated was salvaged by scrappers. There is quite a bit of brick, concrete and iron mixed in the ash. Apparently, the furnaces were removed for scrap value to settle the bankruptcy.

Reynolds Aluminum (operating under the Alreco name) acquired the site in 1981 from Michigan Standard Alloys and Reynolds did a cleanup of the site in the 1980's that included dross and other material. A new owner/operator, Tobian Metals, re-contaminated the site after 1997

with dross before they declared bankruptcy in 2001. This was cleaned up using state brownfield funding for the present owner.

So the site has been cleaned up previously by Reynolds and the state brownfield authority. Strike three is before us.

Best regards, Mike

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Email: baranoskim@michigan.gov

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Tuesday, April 22, 2014 9:08 AM
To: Baranoski, Michael (DEQ)
Subject: RE: Alreco Metals, Request for Assistance

Hi Mike – Want to say 130 at the site this Thursday? I'll confirm with the landowner. Do you have a sense of how much dross is on site vs ash, or have any more info about their historical operations? Is the stuff from ALCOA (initial email below) what we are pretty sure is onsite? I just want to try and do our best to set ourselves up to sample it safely.

Betsy

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office: 734-692-7665
cell: 734-770-8402
fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Baranoski, Michael (DEQ) [mailto:BARANOSKIM@michigan.gov]
Sent: Tuesday, April 22, 2014 8:18 AM
To: Nightingale, Elizabeth
Cc: Heywood, David (DEQ); Ballo, Frank (DEQ); Hohm, Janelle (DEQ)
Subject: RE: Alreco Metals, Request for Assistance

Hi Betsy, I am available Thursday after 1300 Hrs. and would be happy to meet you on site. We did not collect samples at the time I was out there as the material reportedly stored there was dross instead of ash. And like this inspection, we did it on rather short notice.

If Thursday afternoon does not work for you, I will be available any day next week. Best regards, Mike

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Remediation Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
Phone (269)567-3524
FAX (269)567-9440
Email: baranoskim@michigan.gov

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, April 21, 2014 4:31 PM
To: Baranoski, Michael (DEQ)
Cc: Ballo, Frank (DEQ); Heywood, David (DEQ); Hohm, Janelle (DEQ)
Subject: RE: Alreco Metals, Request for Assistance

Hi Mike – I just called Mr. Reid to request that he sign an EPA access agreement, and he said he would prefer to meet us on site. Would this Thursday work for DEQ for a site walk with him? I probably will need to come back again then afterwards to collect samples – I don't think I'll be able get that all arranged by Thursday – I can try though. Did DEQ ever collect any samples of the piles or any of the other waste/materials of concern? If you did, if you could forward the results of those too, I'd appreciate it.

Thanks,

Betsy

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
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Grosse Ile, MI 48138

office: 734-692-7665
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email: nightingale.elizabeth@epa.gov

From: Baranoski, Michael (DEQ) [mailto:BARANOSKIM@michigan.gov]
Sent: Monday, April 21, 2014 3:53 PM
To: Nightingale, Elizabeth

Cc: Ballo, Frank (DEQ); Heywood, David (DEQ); Hohm, Janelle (DEQ)
Subject: RE: Alreco Metals, Request for Assistance

Hi Betsy, attached is a copy of the reply letter we received from Mr. Dorie Reid, the facility owner, along with some of the pictures I took on a site inspection we did at the beginning of the month. Mr. Reid proposes to attempt to attain financing to conduct the cleanup of the ash piles (about a 200 X 80 feet area about 8 feet high), many bags of bag house waste stored in a crumbling structure, and various drums, waste piles and miscellaneous debris scattered across the property. The site is adjacent to the floodplain of the Paw Paw River.

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Sent: Monday, March 31, 2014 11:48 AM
To: Baranoski, Michael (DEQ)
Subject: Alreco Metals

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Thanks!

Betsy

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From: Ballo, Frank (DEQ) [mailto:BALLOF@michigan.gov]
Sent: Monday, March 31, 2014 10:07 AM
To: Nightingale, Elizabeth
Cc: Clements, Mindy; Baranoski, Michael (DEQ); Bennett, Bree (DEQ)
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Thanks, Betsy. The company is no longer operating on the property, so our previous contact information no longer works. We have an old cell phone number for the principal of the company, Dorie Reid, of 616-299-8904. I've called the number and left messages, but haven't received a call back. Mike Baranoski (269-567-3524, baranoskim@michigan.gov) is our project manager for this.

At this point we'd like to refer it to EPA. Give Mike a call to see to see if the two of you can schedule a site visit, and in the interim we'll see if we can glean any additional information on the company/principal.

Thanks again, and contact Mike or me if you have any questions.

--Frank

From: Nightingale, Elizabeth [mailto:nightingale.elizabeth@epa.gov]
Sent: Monday, March 31, 2014 8:46 AM
To: Ballo, Frank (DEQ)
Cc: Clements, Mindy
Subject: RE: Potential Site Candidate for EPA Time Critical Response

Hi Frank,

We can absolutely take a look at it. Is it at the point where you would like to refer it to EPA, and have us do an assessment, or are you still looking into options? I'm in Ohio this week, but will be around some of next week and the following week if you would like to schedule a site visit.

Do you happen to have a phone number for the current owner or their attorney?

My cell is 734-770-8402.

Betsy

Betsy Nightingale
Federal On-Scene Coordinator
United States Environmental Protection Agency, Region 5
9311 Groh Road
Grosse Ile, MI 48138

office: 734-692-7665
cell: 734-770-8402
fax: 734-692-7677
email: nightingale.elizabeth@epa.gov

From: Kimble, Jeffrey
Sent: Friday, March 28, 2014 4:16 PM
To: Clements, Mindy; Ballo, Frank (DEQ)
Cc: Edwards, Tricia; Nightingale, Elizabeth
Subject: Fw: Potential Site Candidate for EPA Time Critical Response

Thanks Frank, as much as I'd love to do another site right now, I won't get any assigned to me until EPA is done at the Enbridge site in Marshall and Kalamazoo, hopefully this fall. I am forwarding this to my supervisor so she can assign it and cc'in a couple coworkers who I know don't have as many sites as others in our office. Thanks and feel free to call me or Mindy with questions.

Thanks for the referral.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ballo, Frank (DEQ) <BALLOF@michigan.gov>
Sent: Friday, March 28, 2014 10:21 AM
To: Kimble, Jeffrey
Cc: Wagner, Robert (DEQ); Erickson, Susan (DEQ); Eagle, Dennis (DEQ)
Subject: Potential Site Candidate for EPA Time Critical Response

Good morning, Jeff, hope you're doing well.

We have a site that was a former secondary aluminum processor called Alreco Metals, Site ID 11000336 (aka Tobian Metals, aka Ace Companies, aka Harbor Light Metals), 900 Alreco Drive, Benton Harbor, Berrien County. Tax records indicate the current property owner is the Reid Group, LLC, P.O. Box 8711, Grand Rapids, MI 49518. Our understanding is the company has either gone through or is going through bankruptcy, and recently someone has been salvaging/demolishing the building. A recent site visit by one of our Air Quality Division staff documented the current state of the building and confirmed large piles of gray aluminum dross now exposed to the elements and the environment (attached). The site is immediately adjacent to wetlands and approximately 200 feet from the Paw Paw River (Google link below). Given the potential nature of dross (Alcoa link below), we're understandably concerned.

We're still gathering information on the situation and haven't been in contact with a company representative, but I thought I'd contact you to see if this is something EPA might take a look at.

Thanks very much, and let me know if you've got questions or need additional information.

Frank

Frank Ballo, District Supervisor
Department of Environmental Quality
Remediation and Redevelopment Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-5025

Phone: 269-567-3531
Fax: 269-567-9440
Email: ballof@michigan.gov

https://maps.google.com/maps?q=900+alreco+drive,+benton+harbor+mi&hl=en&geocode=+&hnear=900+Alreco+Rd,+Benton+Harbor,+Michigan+49022&t=h&z=16

http://www.alcoa.com/global/en/environment/msds_view.asp?LoadMSDS=184498

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
KALAMAZOO DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

REBECCA A. HUMPHRIES
DIRECTOR

April 22, 2010

Mr. Wayne Perry
Harbor Light Metals, LLC, part of Ace Company, LLC
900 Alreco Road
Benton Harbor, Michigan 49023

Dear Mr. Perry:

SUBJECT: Storm Water Industrial/Commercial Inspection
Certificate of Coverage No. MIS310576
Designated Name: Ace Co LLC – Berrien County

On April 12, 2010, staff of the Department of Natural Resources and Environment (DNRE), Water Bureau (WB) conducted a Storm Water Industrial/Commercial Inspection at the Ace Company, LLC, located in Berrien County at 900 Alreco Road, Benton Harbor, Michigan. The purpose of the inspection was to evaluate the facility's compliance with Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) and National Pollutant Discharge Elimination System (NPDES) Certificate of Coverage No. MIS310576 issued on June 10, 2008, effective June 10, 2008.

Mr. Dave Norris, representing Harbor Light Metals, and Mr. Robert Spagnoli, representing the DNRE, participated in the inspection, which included an interview, records review, and site inspection. Ace Company, LLC, owner of Harbor Light Metals, LLC, recovers and refines aluminum (and other metals), producing aluminum alloy products meeting specific customer specifications.

The following items were identified and discussed during our inspection. A copy of the Post Inspection Report, containing additional information, is enclosed.

1. Harbor Light Metals was unable to produce the most recent version of your Storm Water Pollution Prevention Plan (SWPPP) and associated documents such as inspections and annual reviews. It will be necessary to write a new SWPPP if the existing plan cannot be located. An excellent starting template is available at "Michigan.gov." Search for "SWPPP" and down load the DOC (Microsoft Word) version. I would be happy to assist you with any drafts, reviews, or revisions.

2. The site map portion of the SWPPP must be reproduced. Staff will concurrently, with this letter, e-mail you the links to the General Permit covering your particular COC. Please download it and keep it with your new SWPPP. Paragraph I.C.1.a covers the important basic needs of the map.

3. Harbor Light Metals has uncovered dumpsters containing process byproducts and other wastes. These dumpsters must be covered with a tarp, under a roof, moved indoors, or replaced by dumpsters with lids.

4. During the visit, two spills were in evidence. One had occurred earlier, near the scale, where spilled oil was being soaked up with a white powder (lime?) because of having run out of oil absorbent. The other spill was fuel from a piece of equipment with a broken fuel line that had not been cleaned up or contained. It is necessary to keep sufficient spill management materials available at locations where it is handy. Typically, good locations are inside, but near doorways or liquid storage areas.

5. Harbor Light Metals does not currently have a certified storm water operator. You have signed up to take the training and exam here in Kalamazoo on May 12, 2010. If you pass the exam, no further action on the part of Ace Company is required.

Thank you for your cooperation in these matters. Please respond to Items 1 through 4 by **May 28, 2010**. If you have any questions or comments regarding this letter, or would like to meet to discuss it, please contact me at the number listed below. I would be pleased to assist you in getting started and reviewing documents at any stage of the revisions. Thank you for doing your part in helping to keep Michigan's waters clean.

Sincerely,

Robert A. Spagnoli
Senior Environmental Employee
Kalamazoo District Office
Water Bureau
269-567-3628, 269-567-9440 (fax)
spagnolir@michigan.gov

ras/dmm

Enclosure
cc/enc: Mr. Dave Norris, Harbor Light Metals, LLC

DNRE-WATER BUREAU
POST INSPECTION REPORT

Ace Co LLC
Storm Water Industrial/Commercial Inspection
Inspection ID: 41627

FACILITY INFORMATION

Facility Name: Ace Co LLC
Facility Address:
900 Alreco Road
Benton Harbor, Michigan 49022
Facility Phone:
Facility Contact:
Facility Contact Phone:
Primary Industry:

Permit Reviewed Permit No.: MIS310576
Issued: 6/10/2008
Effective: 6/10/2008
Expires: 4/1/2013 **App. Due:** 10/3/2012

Certified Operator:
Certified Operator Phone:

INSPECTION INFORMATION

Insp Start Date	Insp End Date	Transmittal Date
04/12/10	04/12/10	4/22

DNRE Inspector(s)	Workgroup
Robert A. Spagnoli	Kalamazoo

Inspection Contact(s)

Name	Working Title	Phone Number
Dave Norris		

Inspection Summary/Notes

Storm Water Pollution Prevention Plan (SWPPP) records are missing. Numerous exposures to storm water. Open dumpsters are on site. Ace Company, LLC is the umbrella company; Harbor Light is this site in Berrien County

AREAS EVALUATED	Comment
PERMIT REVIEW	Satisfactory

Permit is current. Site qualifies for permit with appropriate discharge and exposure parameters. GPS location is correct.

SWPPP	Un-Satisfactory

Documents could not be found. Former contact has left company and office records were cleaned out. Documents may yet turn up. The site map secured during inspection lacks important details such as catch basin locations and connections.

STRUCTURAL CONTROLS	Marginal

Building is in disrepair. Significant areas of roof are very porous. It appears that water entering inside winds up in various equipment wells. (The equipment has been removed.)

DNRE-WATER BUREAU
POST INSPECTION REPORT

NON-STRUCTURAL CONTROLS — Marginal

Records are lacking. Maintenance appears satisfactory.

CERTIFIED OPERATOR — Satisfactory

Wayne Perry of Harbor Light Metals (wperry@harborlightmetals.com), 269-519-3235, has signed up for the May 12, 2010, exam in Kalamazoo.

CONTAINMENT AREA — Not Applicable

EXPOSURE — Un-Satisfactory

The site has numerous piles of scrap outdoors. Dumpsters are uncovered.

COMPLAINT INVESTIGATION — Not Evaluated

PIPP — Not Evaluated

FOLLOW-UP ACTION

Item ID	Item Name	Due Date	Received Date	Approved Date	Locked	Item Type
3723	Respond to Letter	05/28/10			N	Inspection

Comments

Completed by_____ Date_____

R. Spagnoli 4/13/2010