

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT Emergency Action at G&H Landfill, Utica, MI

FROM William H. Sanders III, Director
Environmental Services Division

TO Henry D. Van Cleve, Acting Director
Emergency Response Division (WH-543-B)

The on-scene coordinator's report on the emergency action at G&H Landfill Site, Shelby Township, Macomb County, Michigan, initiated July 30, 1982 and concluded August 4, 1982, is enclosed. The report follows the format prescribed in the National Contingency Plan.

As a result of the discovery in the Spring of 1982 of PCBs in oily leachate from a closed landfill, MDNR asked USEPA, Region V, Environmental Services Division, to initiate an immediate removal action at the G&H Landfill Site in Shelby Township, Macomb County, Michigan. The PCB contaminated oil had collected on the water surface in a swampy area which is now part of a State recreation area. The action consisted of fencing the area and posting warning signs to minimize public contact. A second immediate removal action took place June-August 1983. Remedial activities have begun at the site.

Ross E. Powers, OSC, undertook the action at a contractor expenditure of \$6901.82.

The site is listed on the National Priority List.

William H. Sanders III, Director

Attachment

cc: Robert Schaeffer/Mary Gade, w/appendicies, 5RC
✓Bill Constantelos/Joel Balmat, 5H
MI DNR

EPA Region 5 Records Ctr.



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ON SCENE COORDINATOR'S REPORT

ON-SCENE COORDINATOR'S REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
CLEAN UP ACTION

**Region V
Environmental Services Division
Spill Response Section**



PREFACE

The U.S. EPA, Region V, Environmental Services Division, was asked by the Michigan Department of Natural Resources (MDNR) to initiate an immediate removal action at the G&H Landfill site, Utica, Michigan, as a result of the discovery of PCBs in oily leachate which had collected on the surface of ponds formed by the seepage from the former industrial and municipal landfill. This seepage occurs south of the railroad tracks and flows southwesterly into the remnants of the Clinton-Kalamazoo Canal. From the long-defunct canal, the water flows into a marshy area and thence to the Clinton River and Lake St. Clair. The area where the PCB contaminated oily leachate ponds are located, is owned by the State of Michigan and is part of the Rochester-Utica State Game Area. The immediate action of fencing and posting warning signs was taken to prevent direct public contact with the PCB contaminated leachate. None of the potentially responsible parties was available or able to supply aid in this immediate removal action. No effort to remove, treat, or in any way handle the leachate or waste material, was undertaken in this action; however, the elimination of (oily) leachate discharge was recommended as a further immediate removal step. The site is under consideration for remedial cleanup. This first project was started July 30, 1982 and completed August 4, 1982. Contractor cost was \$6901.82. A second immediate removal action took place June, July and August 1983.

This report summarizes the ~~subsequent~~ federal EPA immediate removal actions as outlined in the National Contingency Plan.



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I. Summary of Events

A. Cause

The G and H Landfill is a closed and covered waste disposal site located off 23 Mile Road in Section 19 of Shelby Township, Macomb County, Michigan, northwest of the City of Utica (Appendix A). The G and H Landfill Company began operations at this site, an abandoned gravel pit, around 1955. The company leased property owned by Mr. Leonard Forester. Approximately 38 acres of this property were used for waste disposal. The landfill operations were supervised by Mrs. Dorothy Kervin.

Both municipal refuse and liquid industrial wastes were accepted at the site. While most of the site was used as a municipal refuse fill, a large quantity of industrial wastes were disposed. These industrial wastes, primarily paints, solvents, oils and process sludges from the automobile manufacturing industry, were brought to the landfill via railroad and tank truck shipments. A spur rail from the Penn Central Rail line, which bisects the site, was built by G and H for the purpose of waste dumping. Deposition rates of up to 600,000 gallons per month have been reported. In October 1967, a Macomb County Circuit Court Order stopped the deposition of industrial liquid and sludge wastes. The company operated until 1973 as a sanitary landfill for municipal refuse under permits issued by the Michigan Department of Public Health (MDPH) (Appendix E).

B. Location, Threat and Initial Situation

The landfill is situated in an area of quite permeable, sandy glacial outwash soils. An unconfined, shallow sand aquifer, and a deeper, confined sand aquifer exist below the fill. A relatively thick, clay aquiclude separates the two. It is interrupted, however, by the Clinton River. The River and the Clinton-Kalamazoo Canal lie to the west and south of the site. The upper aquifer discharges to the Canal and appears hydraulically unconnected to the River. The property to the south of the railroad is presently owned by the Michigan Department of Natural Resources (MDNR) and is part of the Rochester-Utica State Recreation Area. This State Recreation Area is reportedly used extensively by hikers, fisherman, and other outdoor sportsmen. A residential area is situated immediately to the east. Flooded gravel pits and newer homes lie to the north. All residents in this area depend on private wells for their water.

The immediate problems at the site center around the seepage of oily leachate south of the railroad tracks. Leachate was first noted at the site during a 1964 investigation by the Michigan

Water Resources Commission. The seepage of oily leachate south of the landfill, however, was first documented by the MDNR in late 1978. The seepage has collected in ponds on the MDNR property. Analytical results of samples taken by the MDNR in the Spring of 1982 revealed high levels of polychlorinated biphenyls (PCBs) (Appendix F). From the ponds leachate flows in a southwesterly direction passing under an access road and through a culvert into the Canal. The Canal, which is an archaic structure, is blocked by an earthen dam near Ryan Road. Two culverts just to the west of this dam discharge water from the Canal into a marshy, floodplain area between the Canal and the River (Appendix A).

C. Organization of the Immediate Action and Resources Committed

The Immediate Action was undertaken to prevent the public from coming into direct contact with the PCB contaminated leachate. Chain link and snow fencing was erected around the area to prevent unauthorized access. Warning signs were also posted. No efforts to remove, treat or in any way handle the leachate or waste materials were undertaken at this time.

As indicated, the elevated levels of PCBs in the leachate were first discovered in the spring of 1982. Pursuant to recommendations made during a July 1982 meeting of the Regional Response Team (RRT), OSC Ross Powers submitted the first of three Pollution Reports (Polrep-one) to USEPA headquarters on 16 July 1982 (Appendix D). The 10 point Funding Request cited an immediate threat to users of the State Recreation Area, wildlife and food chain exposure. Forty thousand dollars were requested to clear a path, construct fencing and post warning signs. Pursuant to consultation with the RRT advisors the following changes were made in the 10 point Funding Request: only the area of PCB seepage will be surrounded with chain link and snow fencing, and appropriate warning signs posted. Nine thousand dollars were requested. Contract arrangements were completed with Zappie Fence Company of Rochester, Michigan to install 600 feet of 6 foot chain link fencing with 3 strand barbed wire along the railroad right-of-way frontage of the PCB seepage area and approximately 1,500 feet of snow fencing, connected to the chain link fencing, encircling the seepage area. An access gate for large equipment was also specified to be installed in the chain link fencing. Due to the urgency of the required action, the contractor was obtained through noncompetitive procurement methods. A contract ceiling amount of seven thousand five hundred dollars was set for the work. The final work was completed on 4 August 1982. (Appendix C).

D. Details of the Abatement Action

Under the guidance of OSC Powers and the Technical Assistance Team (TAT), Zappie Fence initiated work at the site on 30 July

1982. Steel posts for the chain link fencing were installed. Chain link fencing was installed on 2 August 1982. On 3 August 1982, the snow fencing was installed. Work was terminated the next day, 4 August 1982 when snow fence installation was completed and the access gate was installed. A total cost of \$6,901.82 was incurred through the contract with Zappie Fence Company. No subcontractors were utilized. Warning signs were later posted on the fence by personnel from the MDNR.

E. Comments on Federal and State Efforts to Replace or Restore Damaged Natural Resources

The subject action was undertaken in order to restrict access to the leachate as quickly as possible. No efforts were made at the time to assess damage to natural resources or restore any resources that may have been damaged. Ground and surface water contamination have been documented and further efforts to monitor the contamination are underway. No studies, however, have been initiated to determine any impact on the biota of the area. Any such impacts may be quite important considering the recreational uses of the area, specifically sport fishing on the Clinton River.

F. Efforts to Obtain Response by Responsible Parties

None of the responsible parties offered to assist in this action. The whereabouts of the property owner, Mr. Forester, and the operator of Mrs. Kervin have not been known to the MDNR for several years, and also unknown to the USEPA. The MDNR, after a review of the available evidence with the Michigan Attorney Generals Office, have decided not to pursue any litigation with any of the responsible parties. Also, the wording of the October 1967 Consent Order which stopped the deposition of industrial wastes, apparently precludes any further legal action against the landfill by the State in respect to the ground and surface water contamination (Appendix E). Pursuit of litigation from the actual or alleged generators has since been initiated by the Regional Counsel in preparation for Remedial Action.

II. Effectiveness of Immediate Actions

A. The Responsible Parties

As previously discussed, neither the property owner, the past operator, or any of the generators of the industrial wastes were available, or able to supply aid in this Immediate Removal Action.

B. State and Local Forces

While the landfill was operating, the Michigan Water Resource Commission was initially responsible for monitoring the site, and determining ground and surface water contamination. They were also responsible for bringing suit against G and H to have the dumping of industrial wastes at the site halted. The MDNR brought this site to the attention of the USEPA. They have also continued to monitor the contamination problem resulting from the landfill. It was through this monitoring that the high levels of PCBs were discovered in the leachate and that the USEPA was subsequently informed of the threat. Personnel from the MDNR also placed the warning signs on the fence after it was installed.

C. Federal Agencies and Special Forces

Once learning of the elevated levels of PCBs from the MDNR, the USEPA was quick in procuring the services of a contractor to restrict access to the seepage. The Field Investigation Team (FIT) had initiated a hydrogeologic study of the site in January 1982. The TAT had also been tasked to sample the leachate in July 1982. Results of sampling from both projects are included in Appendix F.

D. Contractors

The Zappie Fence Company performed the work required of them in an expedient and cost effective manner. Initiation of the work was timely. The quality of the work was satisfactory and was completed in a likewise expedient manner. The entire project was completed at a cost of nearly six hundred dollars below the stated cost ceiling.

III. Problems Encountered

As may be expected, in light of the limited nature of the work involved, no significant problems were encountered with respect to this Immediate Removal Action. As previously discussed, the contractor was obtained through non-competitive procurement methods within a reasonable time after learning of the threat, and the necessary work was quickly and satisfactorily completed.

IV. Recommendations

The elimination of any discharge of leachate away from the seepage area via surface water flow is recommended as an initial, immediate step to curtail the impact of the site on its environs. Secondly, a thorough investigation into the total extent of contaminant migration from the site should be made. This may include a review of previous hydrogeologic work done by the State and the FIT

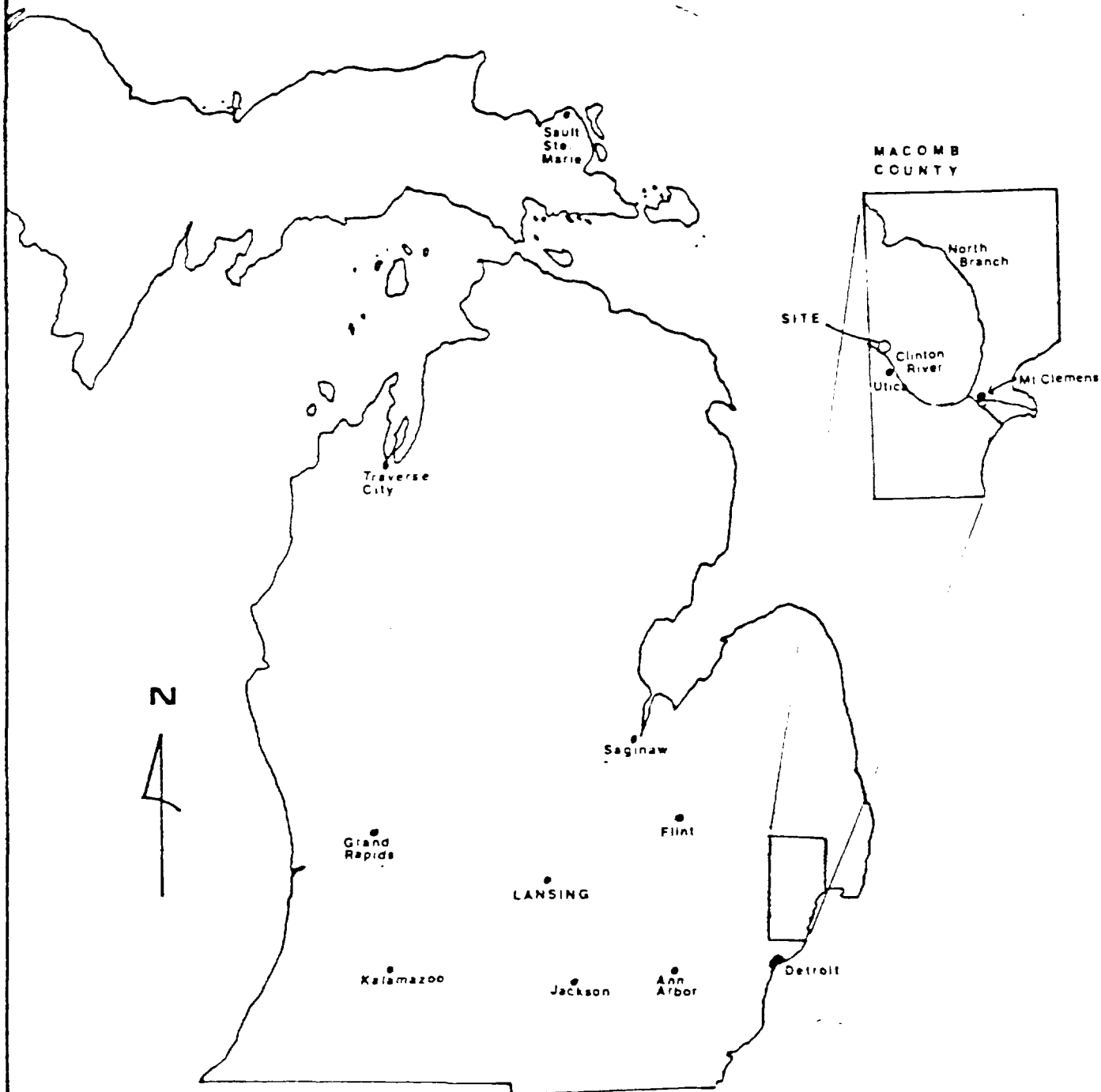
report. Further hydrogeologic investigations may be deemed necessary as a result of the review. Also, a complete investigation of the contaminant spread and impact on surface waters, soils, sediments and biota should be done. Included in this investigation should be further leachate and environmental sampling, biotic surveys and a bioaccumulation study. Efforts should be made to determine potential or actual contaminant pathways through the food chain, particularly in light of the sport fishing in the area (as well as other activities such as hunting, wild food gathering, nearby crop production, etc., which may be occurring).

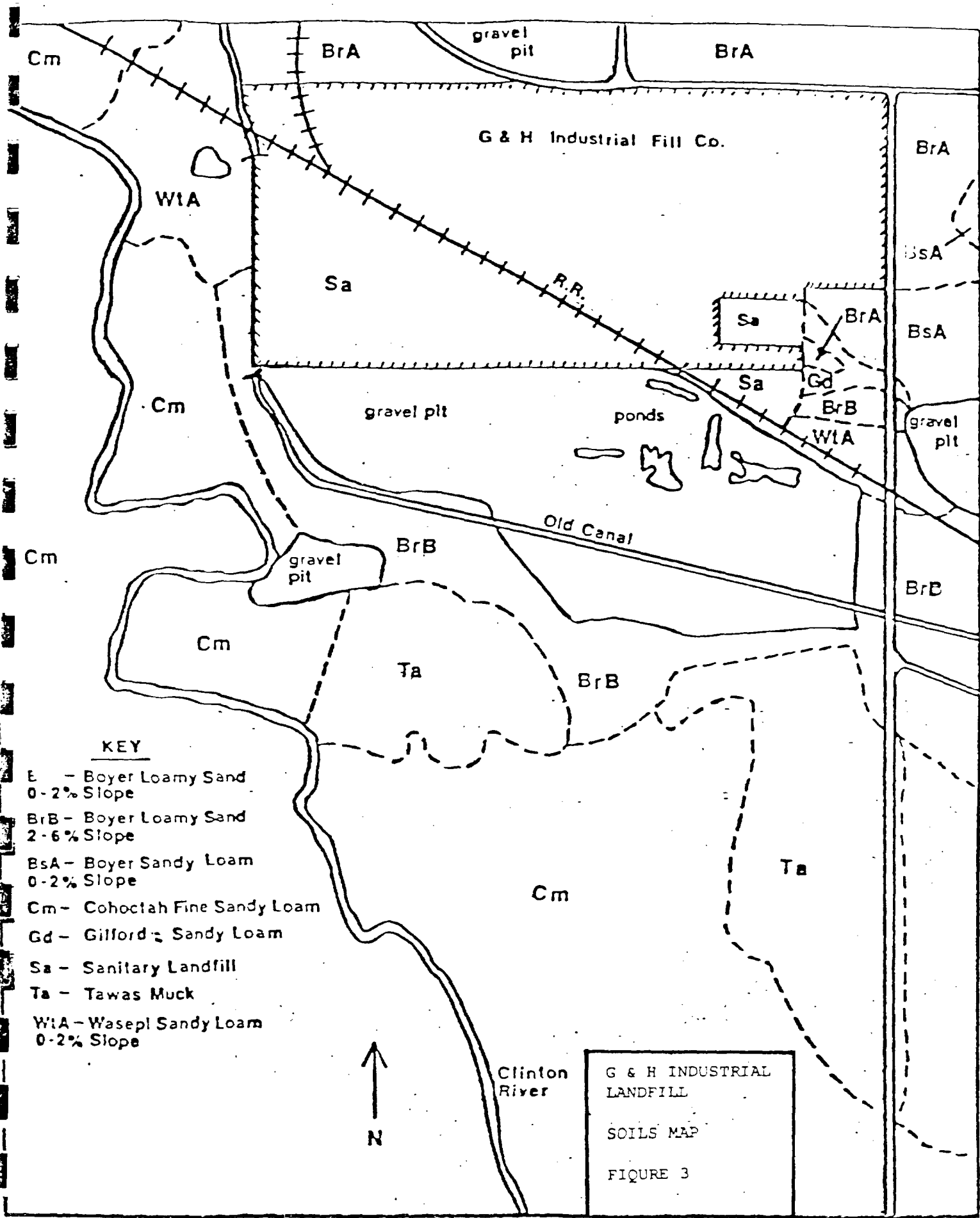
Finally, remedial measures to abate the environmental impact resulting from the landfill should be fully investigated, planned, and instituted.

No recommendations for the National Contingency Plan or Federal regional plan are proposed.

G and H INDUSTRIAL LANDFILL

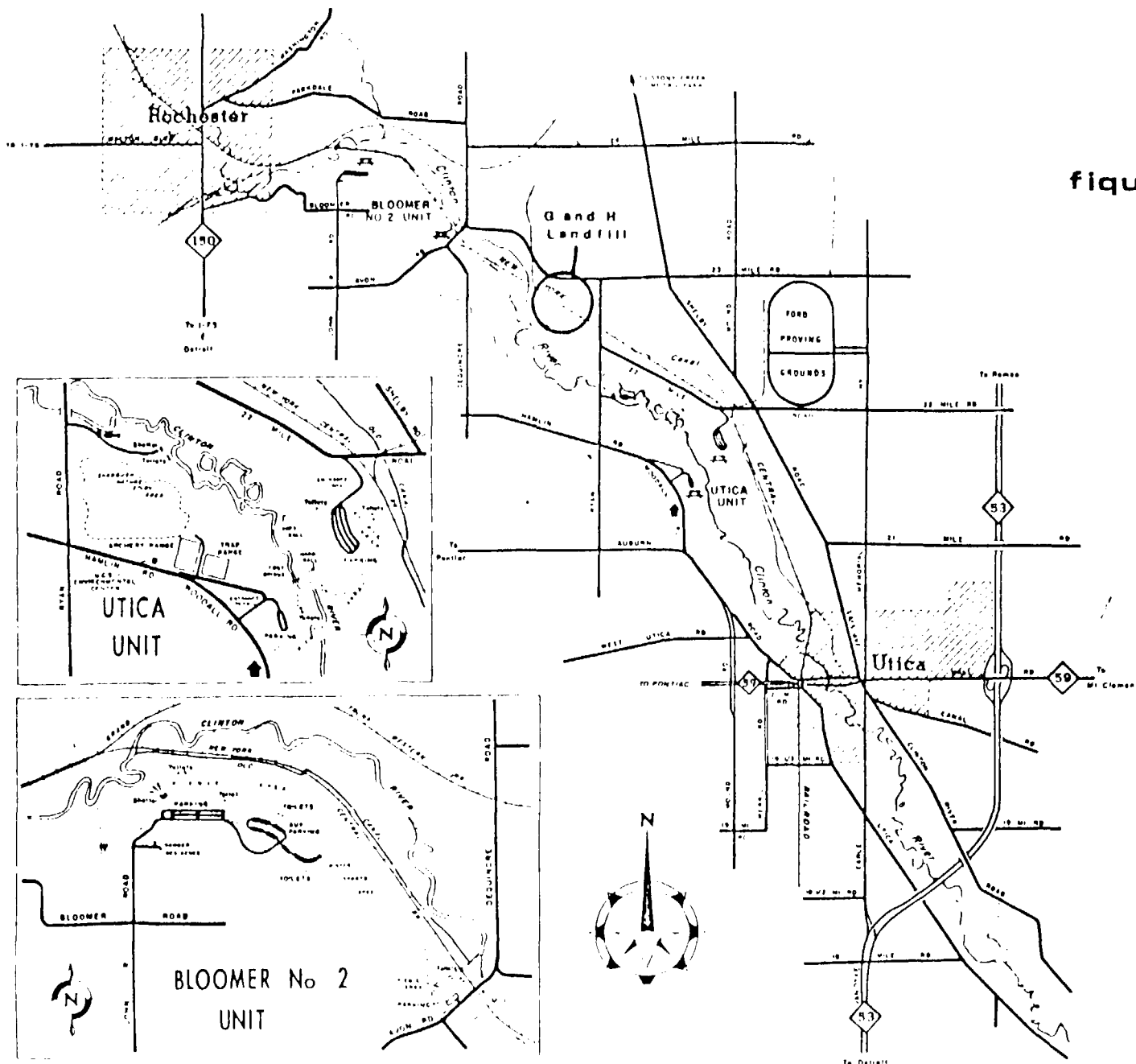
site location
figure 1





ROCHESTER - UTICA RECREATION AREA

figure 4



LEGEND

- HARD SURFACED ROAD
- GRAVELED ROAD
- ... FOOT TRAIL
- ⛶ PICNIC SITE
- 🎣 FISHING SITE
- 🌅 SCENIC VIEW
- 🏠 AREA HEADQUARTERS
- STATE LAND