

VIOLATION NOTICE

Ed Engle and Kevin VanErt Jr

Page 2

July, 16, 2024

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by August 9, 2024. The written response should include: the date(s) the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations, and the date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response to this violation notice may be submitted by mail and directed to Jeremy Howe at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@Michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation extended to me during my visit. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Senior Environmental Quality Analyst
Air Quality Division

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Scott Miller, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

July 16, 2024

VIA E-MAIL

Ed Engle
City of Tecumseh
309 East Chicago Boulevard
Tecumseh, Michigan 49286

Kevin VanErt Jr.
VanErt's, LLC
1506 Sutton Road
Adrian, Michigan 49221

SRN/ID: U462404051; Lenawee County

Dear Ed and Kevin:

VIOLATION NOTICE

On July 11, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint investigation at 317 South Ottawa Street, Tecumseh, Lenawee County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to my investigation, The City of Tecumseh took temporary ownership of the facility during the clean-up and demolition, and VanErt's, LLC, performed the demolition activities. The National Emission Standard for Asbestos (NESHAP) may hold both the *owner and operator* liable for all violations.

During the inspection, EGLE, AQD staff observed the following:

The former industrial facility was demolished, and the site was backfilled and graded. Both the owner and the contractor failed to perform a thorough asbestos inspection on the facility and failed to submit the Notice of Intent to Renovate/Demolish to the administrator prior to the demolition activities.

Process Description	Section Violated	Comments
On 7/11/2024, a complaint was received regarding a demolition at 317 S. Ottawa St., Tecumseh. Upon arrival the facility was demoed. No asbestos survey and no notice of intent was submitted.	40 CFR §61.145(a)	Failed to thoroughly inspect the affected facility.
	40 CFR §61.145(b)(1)	Failed to provide the administrator with written notice of intention to demolish or renovate.



August 5, 2024

Jeremy, Jason, Craig

Re: 317 S Ottawa demolition

I apologize for not being aware of the State regulations for property demolition. Until I met with Craig on July 11, 2024, I was not aware of the requirement to notify the State Department of the demolition at 317 S Ottawa in the City of Tecumseh. I am now. This is not an excuse or denial of responsibility.

This blighted building in the City of Tecumseh had been unsafe for many years. It had been abandoned, neglected, broken into, and even set on fire on March 30, 2017. The building was a very present health and safety issue within our city. The City's previous building director worked diligently to get the owner to clean up the site and was unsuccessful. At that time, steps were taken to take control of the property and try to make it safe. With a court order dated January 25, 2022, and help and complete cooperation from the US EPA—Region 5, we were able to get the building set for demolition.

With much-needed expert care and remediation from the US EPA, work began to remedy this dangerous facility. Throughout the entire process, all conversations were about the demolition of this building and getting it into compliance. I became the building director for the City of Tecumseh in the fall of 2022, and this was my first interaction with the EPA to do such an exhaustive review and remove all hazards from this building. Once the EPA cleared the building, the bid for demolition was posted. Demolition began on May 22, 2024, and was completed by June 12, 2024, with all consideration

Innovative ♦ Timeless ♦ Inviting



for controlling dust. Demolition work was also performed on rainy days, and water from hydrants was used to wet down the process. City sewers were protected from the entrance of "Runoff."

This department has taken actions to prevent this type of violation from reoccurring. All demolition permits have been "flagged" for pre-requisite information, which prohibits a permit from being issued without covering all NESHAP criteria. This does not just cover commercial or industrial builds but all the city's demo needs. All reports from this removal have been sent and are included here again.

Please accept my deepest regret for not notifying this department of the intent to demolish. I want to assure you that this will never happen on my watch or anyone else's in the city of Tecumseh. I am fully committed to spreading this message to all building departments that I interact with, emphasizing the importance of this requirement. I humbly submit this response and am ready to provide any further material on this matter if required.

Thank you.

Edward A Engle,

City of Tecumseh Developmental Services Director

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Spectron Industries - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Spectron Industries
C5WZ
Tecumseh, MI
Latitude: 42.0004063 Longitude: -83.9440617

To: Steve Wolfe, US EPA-R5
Jim Augustyn, U.S. EPA
Sam Borries, U.S. EPA
Jason El-Zein, U.S. EPA
Phillippa Cannon, U.S. EPA
Carolyn Bohlen, U.S. EPA
HQ EOC, U.S. EPA
John Glover, U.S. EPA
Shelly Lam, U.S. EPA
Jeff Lippert, U.S. EPA
Matt Mankowski, U.S. EPA
Motria Caudill, ATSDR
Valincia Darby, U.S. DOI
John Nelson, U.S. DOI
Dana Bradt, EGLE
Dan Eichinger, EGLE
Jay Eickholt, EGLE
Aaron Keatley, EGLE
Keith Krawczyk, EGLE
Katie Kruse, EGLE
Dana Nessel, MI Attorney General
Sheryl Duxtader, EGLE
Jane Emily White, EGLE

From: Joshua Peters, On-Scene Coordinator
Date: 9/1/2023
Reporting Period: 08/21/2023 to 09/01/2023

1. Introduction

1.1 Background

Site Number:	C5WZ	Contract Number:	
D.O. Number:		Action Memo Date:	6/7/2023
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/21/2023	Start Date:	8/8/2023
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000521864	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Spectron Industries site is located in Tecumseh, Lenawee County, MI (42.0003654° latitude, -83.9440346° longitude). The site is composed of a 0.25 acre abandoned plating and machine shop.

The Site is bounded to the north and east by residential properties and to the south and west by commercial and industrial properties.

1.1.2.2 Description of Threat

In September 2022, the City of Tecumseh requested assistance from US EPA at the Spectron Industries

site. Drums, vats, and miscellaneous containers storing hazardous substances. EPA conducted a site assessment on 12/2/22 to document and sample suspected threats. Approximately 30 drums(55 gal), 10 containers(30 gal), 2 vats(400 gal), and 220 small containers(5 gal) were identified on-site. Analytical results of EPA collected samples report elevated levels of Cadmium, Chromium, Cyanide, Lead, and Silver in solids and liquids stored within various containers.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See section 1.1.2.2

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA was notified of potential hazardous substances present at the Site through communications with the City of Tecumseh. September 7, 2022, the City of Tecumseh requested assistance from EPA to address the risks posed by the Site.

EPA conducted a Removal Site Evaluation on 12/2/22 that documented the unsecured plating shop, drums, and hazardous substances onsite. EPA mobilized to the Site on 8/21/23 to begin a Time Critical Removal Action.

2.1.2 Response Actions to Date

EPA mobilized to the site on 8/21/2023 with their START and ERRS contractors to begin site setup. From 8/21 to 8/25, EPA and their contractors staged equipment trailers, designated work zones, set up office trailers and generators, and installed building lighting.

8/28/23

EPA set up work zones and blocked off sidewalks around the work area. Floors were swept clear of dust and debris using a sweeping compound. A skid steer was used to move trash and debris out of the work area. Workers moved buckets and containers from the main room to the west room for staging on plastic liner.

8/29/23

EPA continued sorting and staging containers within the building on plastic liners. Brush and vegetation was removed on the east side of the building to gain access to an overhead door. Sawdust was applied to building floors to soak up residual precipitation. The building was rescreened for radiation which confirmed the two materials were above background levels. These two low level radiation materials were covered with plastic sheeting and taped to prevent disturbance.

8/30/23

EPA continued to collect containers mixed in with debris and broken manufacturing equipment and staged at east and west ends of the building. Containers were collected from shelves and debris piles to be placed on plastic sheeting. Berms were installed on staging pads to prevent potential spills from leaving the containment.

8/31/23

EPA continued moving drums and containers to staging areas. Part of an interior wall was removed to gain access to the main plating operation. This room contained vats and drums holding various amounts of liquid and/or solids. EPA began testing pH of drums and containers to mark as acids, bases, or neutral liquids. Liquids were transferred from three (3) open top drums and approximately six (6) buckets to poly drums to ensure proper storage during transportation.

9/1/23

EPA continued sorting containers on the east and west staging pads. Total container counts were estimated as 44 vats, 93 drums (55 gallons), 293 buckets (including 110 empty), and 129 small containers (1 gallon or less). Containers storing solids were moved from the west room to the main room and bulked into poly drums. EPA continued transferring liquids from small containers into poly totes. Exterior entrances to the building were secured for weekend security.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

No current activity

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Continue to stage containers for HAZCAT.
- Cut empty containers and dispose in an appropriate roll off.
- Bulk equivalent wastes in compatible containers.

- Sample waste streams for disposal.
- Secure transport and disposal of wastes from Site.

2.2.2 Issues

N/A

2.3 Logistics Section

US EPA mobilized office trailers, generators, and an equipment trailer to the site during the week of 8/21.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$250,000.00	\$47,175.10	\$202,824.90	81.13%
TAT/START	\$30,000.00	\$17,000.00	\$13,000.00	43.33%
Intramural Costs				
Total Site Costs	\$280,000.00	\$64,175.10	\$215,824.90	77.08%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The site Health and Safety Plan was finalized on 8/15/23 and signed by all site personnel.

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Tecumseh

EGLE

4. Personnel On Site

EPA - 1

ERRS - 1 EQM/5 HEPACO

START - 1

5. Definition of Terms

ATSDR – Agency for Toxic Substances and Disease Registry
 CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
 CRZ - Contaminant Reduction Zone
 EGLE – Michigan Department of Environment, Great Lakes, and Energy
 EPA – U.S. Environmental Protection Agency
 ERT – EPA Environmental Response Team
 ERRS - Emergency and Rapid Response Services
 HazCat - Field testing to determine waste categorization
 HAZMAT – Hazardous Materials
 ER – Emergency Response
 LEL – Lower Explosive Limit
 OSC – On-Scene Coordinator
 ppb – parts per billion
 ppm – parts per million
 PRP – Potentially Responsible Party
 START – Superfund Technical Assessment Response Team
 VOC – Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

PolReps will be submitted as needed until the project concludes

7. Situational Reference Materials

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Spectron Industries - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Progress
Spectron Industries
C5WZ
Tecumseh, MI
Latitude: 42.0004063 Longitude: -83.9440617

To: Steve Wolfe, U.S. EPA
Jim Augustyn, U.S. EPA
Sam Borries, U.S. EPA
Jason El-Zein, U.S. EPA
Phillippa Cannon, U.S. EPA
Carolyn Bohlen, U.S. EPA
HQ EOC, U.S. EPA
John Glover, U.S. EPA
Shelly Lam, U.S. EPA
Jeff Lippert, U.S. EPA
Matt Mankowski, U.S. EPA
Motria Caudill, ATSDR
Valincia Darby, U.S. DOI
John Nelson, U.S. DOI
Dana Bradt, EGLE
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Jay Eickholt, EGLE
Aaron Keatley, EGLE
Keith Krawczyk, EGLE
Katie Kruse, EGLE
Dana Nessel, MI Attorney General
Sheryl Duxtader, EGLE
Jane Emily White, EGLE
Dan Swallow, City of Tecumseh
Ed Engle, City of Tecumseh

From: Joshua Peters, On-Scene Coordinator
Date: 9/8/2023
Reporting Period: 9/4/2023 to 9/8/2023

1. Introduction

1.1 Background

Site Number:	C5WZ	Contract Number:	
D.O. Number:		Action Memo Date:	6/7/2023
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/21/2023	Start Date:	8/8/2023
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000521864	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Spectron Industries site is located in Tecumseh, Lenawee County, MI (42.0003654° latitude, -83.9440346° longitude). The site is composed of a 0.25 acre abandoned plating and machine shop.

The Site is bounded to the north and east by residential properties and to the south and west by commercial and industrial properties.

1.1.2.2 Description of Threat

In September 2022, the City of Tecumseh requested assistance from US EPA at the Spectron Industries site. Drums, vats, and miscellaneous containers storing hazardous substances. EPA conducted a site assessment on 12/2/22 to document and sample suspected threats. Approximately 30 drums(55 gal), 10 containers(30 gal), 2 vats(400 gal), and 220 small containers(5 gal) were identified on-site. Analytical results of EPA collected samples report elevated levels of Cadmium, Chromium, Cyanide, Lead, and Silver in solids and liquids stored within various containers.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA was notified of potential hazardous substances present at the Site through communications with the City of Tecumseh. September 7, 2022, the City of Tecumseh requested assistance from EPA to address the risks posed by the Site.

EPA conducted a Removal Site Evaluation on 12/2/22 that documented the unsecured plating shop, drums, and hazardous substances onsite. EPA mobilized to the Site on 8/21/23 to begin a Time Critical Removal Action.

2.1.2 Response Actions to Date

For previous Site activities see PolRep#1

9/5/23

EPA continued to prepare drums, vats, and miscellaneous containers for sampling. EPA began numbering drums and taking an inventory of containers on-site. A total of 71 drums, 270 small containers (<5 gal), and 36 vats were identified.

9/6/23

EPA began collecting samples from individual containers for chemical field identification (HazCat). Sample jars were collected from 71 drums and 36 vats. Empty liquid tote containers were delivered to the site for transfer of liquids from vats.

9/7/23

EPA continued collecting samples for HazCat. Sample jars were collected from a total of 169 small containers (<5 gal). A 30 yard roll off box was delivered and staged for collection of RCRA empty containers and used PPE. The roll off box was lined before use and will be covered at the end of each day. EPA began cutting up empty containers to dispose of in the roll off box. Fifty (50) polyethelene (plastic) drums were delivered to the site for liquid transfer and disposal. A container box was delivered to the site to store the drums and totes in. Additional fencing was installed around the roll off and container box.

9/8/23

EPA completed sample jar collection of the remaining small containers (< 5 gal). EPA continued to cut up empty containers for disposal. EPA began transferring liquids from vats to empty plastic drums using a pump. Solids from vats were transferred to separate empty drums. At the conclusion of the week, the building was secured for the weekend.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

No current activity

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- HAZCAT all containers
- Cut empty containers and dispose in an appropriate roll off.
- Bulk equivalent wastes in compatible containers.
- Sample waste streams for disposal.
- Secure transport and disposal of wastes from Site.

2.2.2 Issues

N/A

2.3 Logistics Section

Equipment will be mobilized and demobilized as needed throughout the project.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$250,000.00	\$73,138.71	\$176,861.29	70.74%
TAT/START	\$30,000.00	\$17,000.00	\$13,000.00	43.33%
Intramural Costs				
Total Site Costs	\$280,000.00	\$90,138.71	\$189,861.29	67.81%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The site Health and Safety Plan was finalized on 8/15/23 and signed by all site personnel.

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Tecumseh

EGL

4. Personnel On Site

EPA - 1

ERRS - 1 EQM/5 HEPACO

START - 1

5. Definition of Terms

ATSDR – Agency for Toxic Substances and Disease Registry

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act

CRZ - Contaminant Reduction Zone

EGL – Michigan Department of Environment, Great Lakes, and Energy

EPA – U.S. Environmental Protection Agency

ERT – EPA Environmental Response Team

ERRS - Emergency and Rapid Response Services

HazCat - Field testing to determine waste categorization

HAZMAT – Hazardous Materials

ER – Emergency Response

LEL – Lower Explosive Limit

OSC – On-Scene Coordinator

ppb – parts per billion

ppm – parts per million

PRP – Potentially Responsible Party

RCRA - Resource Conservation and Recovery Act

START – Superfund Technical Assessment Response Team

VOC – Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

PolReps will be submitted as needed until the project concludes

7. Situational Reference Materials

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Spectron Industries - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Spectron Industries
C5WZ
Tecumseh, MI
Latitude: 42.0004063 Longitude: -83.9440617

To: Steve Wolfe, U.S. EPA
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Matt Mankowski, U.S. EPA
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Jay Eickholt, EGLE
Aaron Keatley, EGLE
Keith Krawczyk, EGLE
Katie Kruse, EGLE
Dana Nessel, MI Attorney General
Sheryl Duxtader, EGLE
Jane Emily White, EGLE
Dan Swallow, City of Tecumseh
Ed Engle, City of Tecumseh

From: Joshua Peters, On-Scene Coordinator
Date: 9/19/2023
Reporting Period: 09/11/2023 to 09/15/2023

1. Introduction

1.1 Background

Site Number:	C5WZ	Contract Number:	68HE0523F0077
D.O. Number:		Action Memo Date:	6/7/2023
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/21/2023	Start Date:	8/8/2023
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000521864	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Spectron Industries site is located in Tecumseh, Lenawee County, MI (42.0003654° latitude, -83.9440346° longitude). The site is composed of a 0.25 acre abandoned plating and machine shop.

The Site is bounded to the north and east by residential properties and to the south and west by commercial and industrial properties.

1.1.2.2 Description of Threat

In September 2022, the City of Tecumseh requested assistance from US EPA at the Spectron Industries site. Drums, vats, and miscellaneous containers storing hazardous substances. EPA conducted a site assessment on 12/2/22 to document and sample suspected threats. Approximately 30 drums(55 gal), 10 containers(30 gal), 2 vats(400 gal), and 220 small containers(5 gal) were identified on-site. Analytical results of EPA collected samples report elevated levels of Cadmium, Chromium, Cyanide, Lead, and Silver in solids and liquids stored within various containers.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA was notified of potential hazardous substances present at the Site through communications with the City of Tecumseh. September 7, 2022, the City of Tecumseh requested assistance from EPA to address the risks posed by the Site.

EPA conducted a Removal Site Evaluation on 12/2/22 that documented the unsecured plating shop, drums, and hazardous substances onsite. EPA mobilized to the Site on 8/21/23 to begin a Time Critical Removal Action.

2.1.2 Response Actions to Date

For previous Site activities see PolRep#2

From **September 11 to 15, 2023**, EPA transferred neutral liquids and solids into 55 gallon poly drums. A chemist was mobilized to the Site to begin hazardous categorization (HAZCAT) of the chemicals stored in the building. Samples from each container were tested for characteristics such as pH, flammability, oxidation, and combustibility. A total of 383 samples were tested.

EPA bulked small containers (< 5 gallons) of liquids and solids into ten (10) separate poly drums. Empty containers were organized and cut up for disposal in roll off boxes. Two (2) containers that were reading higher than background radiation levels were overpacked into drums. EPA used an X-ray Fluorescent Instrument to measure elements of the material. The results showed that the material was approximately 96% Zirconium. The roll off box was picked up from the site and one empty roll off box was delivered in its place.

At the conclusion of the week, the building was secured for the weekend.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

No current activity

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
RCRA Empty Containers	Solid	30 CY	SI-001	NA	Evergreen

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Cut empty containers and dispose in an appropriate roll off.
- Bulk equivalent wastes in compatible containers.
- Secure transport and disposal of wastes from Site.
- Clean up site for demobilization

2.2.2 Issues

N/A

2.3 Logistics Section

Equipment will be mobilized and demobilized as needed throughout the project.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$250,000.00	\$132,687.00	\$117,313.00	46.93%
TAT/START	\$51,000.00	\$25,000.00	\$26,000.00	50.98%
Intramural Costs				
Total Site Costs	\$301,000.00	\$157,687.00	\$143,313.00	47.61%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The site Health and Safety Plan was finalized on 8/15/23 and signed by all site personnel.

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Tecumseh

EGLE

4. Personnel On Site

EPA - 1

ERRS - 1 EQM/4 HEPACO

START - 1

5. Definition of Terms

ATSDR – Agency for Toxic Substances and Disease Registry

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act

CRZ - Contaminant Reduction Zone

EGLE – Michigan Department of Environment, Great Lakes, and Energy

EPA – U.S. Environmental Protection Agency

ERT – EPA Environmental Response Team

ERRS - Emergency and Rapid Response Services

HazCat - Field testing to determine waste categorization

HAZMAT – Hazardous Materials

ER – Emergency Response

LEL – Lower Explosive Limit

OSC – On-Scene Coordinator

ppb – parts per billion

ppm – parts per million

PRP – Potentially Responsible Party

RCRA - Resource Conservation and Recovery Act

START – Superfund Technical Assessment Response Team

VOC – Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

PolReps will be submitted as needed until the project concludes

7. Situational Reference Materials

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Spectron Industries - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Progress
Spectron Industries
C5WZ
Tecumseh, MI
Latitude: 42.0004063 Longitude: -83.9440617

To: Steve Wolfe, U.S. EPA
Jim Augustyn, U.S. EPA
Sam Borries, U.S. EPA
Jason El-Zein, U.S. EPA
Phillippa Cannon, U.S. EPA
Carolyn Bohlen, U.S. EPA
HQ EOC, U.S. EPA
John Glover, U.S. EPA
Shelly Lam, U.S. EPA
Jeff Lippert, U.S. EPA
Matt Mankowski, U.S. EPA
Motria Caudill, ATSDR
Valincia Darby, U.S. DOI
John Nelson, U.S. DOI
Dana Bradt, EGLE
Dan Eichinger, EGLE
Jay Eickholt, EGLE
Aaron Keatley, EGLE
Keith Krawczyk, EGLE
Katie Kruse, EGLE
Dana Nessel, MI Attorney General
Sheryl Duxtader, EGLE
Jane Emily White, EGLE
Dan Swallow, City of Tecumseh
Ed Engle, City of Tecumseh

From: Joshua Peters, On-Scene Coordinator
Date: 9/22/2023
Reporting Period: 9/18 to 9/22/2023

1. Introduction

1.1 Background

Site Number:	C5WZ	Contract Number:	68HE0523F0077
D.O. Number:		Action Memo Date:	6/7/2023
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/21/2023	Start Date:	8/8/2023
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000521864	RCRIS ID:	
ERNS No.:		State Notification:	EGLE
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Spectron Industries site is located in Tecumseh, Lenawee County, MI (42.0003654° latitude, -83.9440346° longitude). The site is composed of a 0.25 acre abandoned plating and machine shop.

The Site is bounded to the north and east by residential properties and to the south and west by commercial and industrial properties.

1.1.2.2 Description of Threat

In September 2022, the City of Tecumseh requested assistance from US EPA at the Spectron Industries site. Drums, vats, and miscellaneous containers storing hazardous substances. EPA conducted a site assessment on 12/2/22 to document and sample suspected threats. Approximately 30 drums(55 gal), 10 containers(30 gal), 2 vats(400 gal), and 220 small containers(5 gal) were identified on-site. Analytical results of EPA collected samples report elevated levels of Cadmium, Chromium, Cyanide, Lead, and Silver in solids and liquids stored within various containers.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA was notified of potential hazardous substances present at the Site through communications with the City of Tecumseh. September 7, 2022, the City of Tecumseh requested assistance from EPA to address the risks posed by the Site.

EPA conducted a Removal Site Evaluation on 12/2/22 that documented the unsecured plating shop, drums, and hazardous substances onsite. EPA mobilized to the Site on 8/21/23 to begin a Time Critical Removal Action.

2.1.2 Response Actions to Date

For previous Site activities see PolRep#3

From **September 18 to 22, 2023**, EPA completed Hazard Categorization (HazCat) of the materials on-site. A total of 383 samples were tested. Liquids and solids samples were collected and shipped to a contract lab for disposal parameter analysis. The roll off box was picked up from the Site and sent to a disposal facility. A new empty roll off box was delivered to collect the remaining empty containers and debris within the building.

EPA completed transferring and bulking of liquid wastes to drums and totes. These containers were moved to staging areas in a shipping container box and on concrete pad within the building. These containers will remain in place until transportation and disposal is secured. Disposal of emptied vats, drums, and small containers into the roll off box was continued. Absorbents were spread over floors and swept up to collect rainwater that infiltrated the building. At the conclusion of the week, the building was secured for the weekend.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

No current activity

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
RCRA Empty Containers	Solid	30 CY	SI-001	NA	Evergreen

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Cut empty containers and dispose in an appropriate roll off.
- Clean and organize work zone footprint.
- Secure transport and disposal of wastes from Site.
- Clean up site for demobilization

2.2.2 Issues

N/A

2.3 Logistics Section

Equipment will be mobilized and demobilized as needed throughout the project.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$493,000.00	\$132,687.00	\$360,313.00	73.09%
TAT/START	\$51,000.00	\$30,000.00	\$21,000.00	41.18%
Intramural Costs				
Total Site Costs	\$544,000.00	\$162,687.00	\$381,313.00	70.09%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The site Health and Safety Plan was finalized on 8/15/23 and signed by all site personnel.

2.5.2 Liaison Officer

N/A
2.5.3 Information Officer
N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Tecumseh
EGLE

4. Personnel On Site

EPA - 1
ERRS - 1 EQM/4 HEPACO
START - 1

5. Definition of Terms

ATSDR – Agency for Toxic Substances and Disease Registry
CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
CRZ - Contaminant Reduction Zone
EGLE – Michigan Department of Environment, Great Lakes, and Energy
EPA – U.S. Environmental Protection Agency
ERT – EPA Environmental Response Team
ERRS - Emergency and Rapid Response Services
HazCat - Field testing to determine waste categorization
HAZMAT – Hazardous Materials
ER – Emergency Response
LEL – Lower Explosive Limit
OSC – On-Scene Coordinator
ppb – parts per billion
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PRP – Potentially Responsible Party
RCRA - Resource Conservation and Recovery Act
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VOC – Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

PolReps will be submitted as needed until the project concludes

7. Situational Reference Materials

No information available at this time.



City of Tecumseh
309 E. Chicago Blvd.,
Tecumseh, MI 49286

www.mytecumseh.org/



From: Ed Engle
Sent: Thursday, July 11, 2024 12:13 PM
To: 'dechyc@michigan.gov' <dechyc@michigan.gov>
Cc: Dan Swallow <dswallow@tecumsehmi.gov>; Sonya Grubb <sgrubb@tecumsehmi.gov>
Subject: FW: 317 South Ottawa Spectron Industries

Craig

Sending this along to give identity to this project and timeline . The EPA started the assessment in Aug of 23 and completed the site December of 23 . I will forward all information that you need on this behalf ,thank you .

Ed Engle

Building Services Director

Email: Eengle@tecumsehmi.gov
buildingservices@tecumsehmi.gov

Phone: 517-424-6548 ext. 102



City of Tecumseh
309 E. Chicago Blvd.,
Tecumseh, MI 49286

www.mytecumseh.org/



From: Peters, Joshua <Peters.Joshua@epa.gov>
Sent: Tuesday, December 5, 2023 11:10 AM
To: Dan Swallow <dswallow@tecumsehmi.gov>; Ed Engle <eengle@tecumsehmi.gov>
Subject: 317 South Ottawa Spectron Industries

Dan and Ed,

I hope this finds you both well. EPA is concluding our removal action at the former Spectron Industries plating shop this week. This morning containerized waste was loaded and sent to a disposal facility. We will be straightening up around the property and packing up our equipment today and tomorrow. I can provide a report summarizing our activities at the site after it is finalized in the next few weeks. It has been a pleasure working with you both and I have greatly enjoyed my time here in Tecumseh.

Please let me know if you have any questions or concerns.

Josh Peters

On-Scene Coordinator
U.S EPA - Region 5
2565 Plymouth Road
Ann Arbor, MI
Office: (734) 214-4959
Cell: (708) 222-7337

Ed Engle

From: Dechy, Craig (EGLE) <DechyC@michigan.gov>
Sent: Monday, July 15, 2024 2:18 PM
To: Dan Swallow; Ed Engle
Cc: Sonya Grubb
Subject: Re: 317 South Ottawa Spectron Industries

Received.

Yes, it does. You may want to have Ed include this letter with his response.

Thanks,

Craig

From: Dan Swallow <dswallow@tecumsehmi.gov>
Sent: Monday, July 15, 2024 8:44:54 AM
To: Dechy, Craig (EGLE) <DechyC@michigan.gov>; Ed Engle <eengle@tecumsehmi.gov>
Cc: Sonya Grubb <sgrubb@tecumsehmi.gov>
Subject: RE: 317 South Ottawa Spectron Industries

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Craig –

It was the City's understanding that USEPA surveyed the building for hazardous materials, including asbestos. We actually included references to the USEPA reports in the bid package for the demolition. EGLE representatives were notified of these remediation activities throughout the process, and we did not receive any feedback on other potential issues that were not addressed by the USEPA contract. While I understand that not understanding the scope of USEPA work does not necessarily excuse us from your rules and regulations, that was our understanding in moving forward after the USEPA contract was completed.

This building was becoming a very significant hazard to the community. The City could have left it sit, and risk all sorts of exposures to the community. However, the City's goal throughout the process was to protect our residents. We have spent significant taxpayer money in pursuing legal action against the property owner, in obtaining a court order to be able to enter on the property to remediate the hazardous materials, and to ultimately demolish the building. I believe everyone would agree that we have a much, much safer situation today that what existed before the City got involved. I would hope that is taken into consideration in the EGLE review of this situation.

Thank you for your assistance, and bringing us up to speed on the asbestos rules as it relates to demolition.

Dan Swallow

City Manager

Email:
Dswallow@tecumsehmi.gov

Phone: 517-424-6555 ext. 101