

REPORT ON INSPECTION TO DETERMINE COMPLIANCE
WITH THE PCB DISPOSAL AND MARKING REGULATION

EPA Region 5 Records Ctr.



237143

Textile Road Drum Site
PEAS 479-83
NW $\frac{1}{4}$, Section 25, Ypsilanti Township
Washtenaw County, Michigan

PCB INSPECTION #81012

June 29, 1983

Performed by:

MICHIGAN DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE DIVISION
P.O. BOX 30028
LANSING, MICHIGAN 48909

IV OBJECTIVES

The inspection was conducted to determine the site's compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register.

V. SITE BACKGROUND

The Ford Rawsonville plant adjoins the east property edge of this site which reportedly was once owned by Ford. The property was sold by Ford to a farmer in the 1940's who sold it shortly thereafter to the Thumms. For several years the Thumms operated a gravel operation from the site. As a result, a large part of the property is now a shallow "pond" fed by groundwater with no inlet or outlet.

In May, 1973 the Thumms signed a ten year land contract with Holtzman and Silverman, land developers. Within months of the title exchanging hands, drums were reported to be on the site in March 1983. The remaining land contract payment is expected to be withheld until the responsibility/liability and clean-up issues are resolved.

The drums corrosion would indicate that they are several years old. Investigations are being made to determine the generator(s). All of the drums have been inventoried using an alpha identifier for each. Drum K has stenciling that would appear to identify its generator as the Hydramatic, Willow Run plant. The drums include: closed and open head construction; liquid and/or solid contents; various stages from full to empty; and conditions ranging from contained to punctured or seriously corroded and leaking. Most of the drums no longer have distinguishing marks and may not be traceable.

Whether the drums were put on-site with any knowledge or permission of any of the parties involved has not been determined. Mr. Voelpel states his clients did not have any knowledge nor gave any permission for the activity.

The activity includes much more than drums. In the same area as the drums are mounds as high as three feet of black and rusty colored rags and solids. These mounds appear to have been dumped by truck and have petroleum and metal shaving contents. An adjacent area is visually about 90 feet square, discolored, and is visually devoid of plant life. This combined with odors detected in subsurface samples would indicate that liquids might have been dumped here. There are several other similar but smaller areas.

In addition to surface stained areas, there were also about three distinct piles of black wood blocks. The wood blocks resembled those that were used for flooring in many of the older industrial plants.

According to the parties involved, this activity was apparently limited to the area north of the "pond". The pond reportedly covers 40 acres and supports a variety of turtle, fish and related plant and wildlife. This pond is also used for irrigating a strawberry farm, and for fishing by numerous trespassers. Many people caught fishing are thought to come from the nearby trailer park. The area visibly involved has been fenced off and contamination warnings have been posted.

VI SAMPLES

On June 29, 1983, Gene Hall and the author took photographs and sampled various areas of the site for PCBs. The parties involved were given duplicates of each. Each of the sample locations is identified on the attached diagram.

<u>Sample I.D.</u>	<u>Time</u>	<u>Source</u>	<u>Results (ppm)</u>
81012A	10:30	Surface soil adjacent to the east concrete pile and the path. 150" west of the drums	14.0
81012B	10:45	Pond water at the SW corner of the drum area	ND
81012C	10:55	Sediments at the pond edge and the SW corner of the drum area	100.0
81012D	11:03	Surface soil 3 feet SE of Boring #2	360.0
81012E	11:10	Black material on the ground between drums AU & AW	4.5
81012F	11:20	Black waste pile - south of the drums - north of the Aspen and pond	28.0
81012G	11:30	Wood block from piles 200' west of the drum area	11.0
81012H	12:35	Across the two tracks from the entry path 300' west of the drum area	1.3
81012I	12:45	Soil boring #2A at 2½ feet deep	6.1
8.012J	13:15	Soil boring #4 at 8' deep (water table)	22.0

These results identify PCBs wherever sampling was done except in the pond water. Although not identified in the pond water, 100 ppm PCBs were reported in the sediments at the water's edge. Approximately forty feet away from the drums and debris, 360 ppm PCBs were reported in surface soils. A sample taken at the groundwater table identified 22 ppm PCBs. It is obvious that an extensive sampling program is needed to identify the extent of the horizontal and vertical PCB contamination.

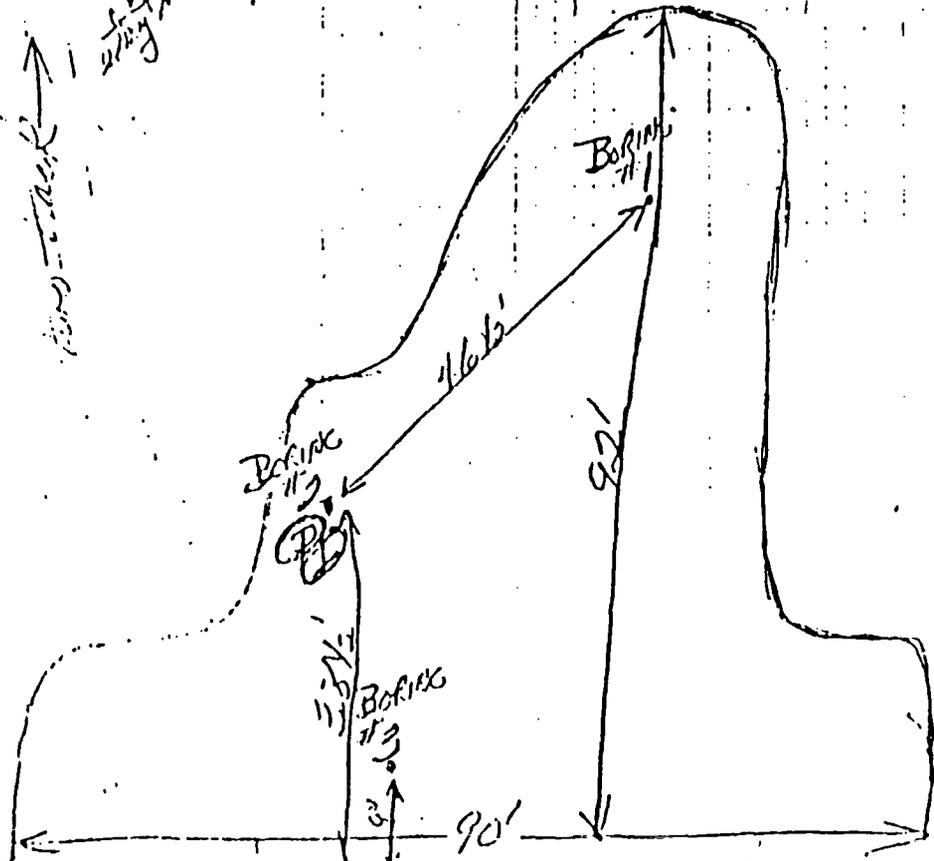
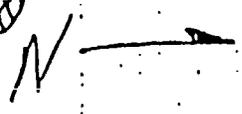
VII PHOTOGRAPHS

- #1 - Northern most barrels
- #2 - Barrels in trees
- #3 - Barrels near pond edge - taken from #2
- #4 - Debris mounds at pond edge near barrels - taken from #3
- #5 - Visible contamination and fenced drums - taken 90' to NW.

The MDNR Groundwater Division is continuing to pursue clean-up of the site. As there appears to be question whether TSCA has any authority at the site, the PCB investigation is being referred to the Chicago Regional EPA office.

TEXTILE KD EXHIBIT 110
6-29-81

Coastline
7-5
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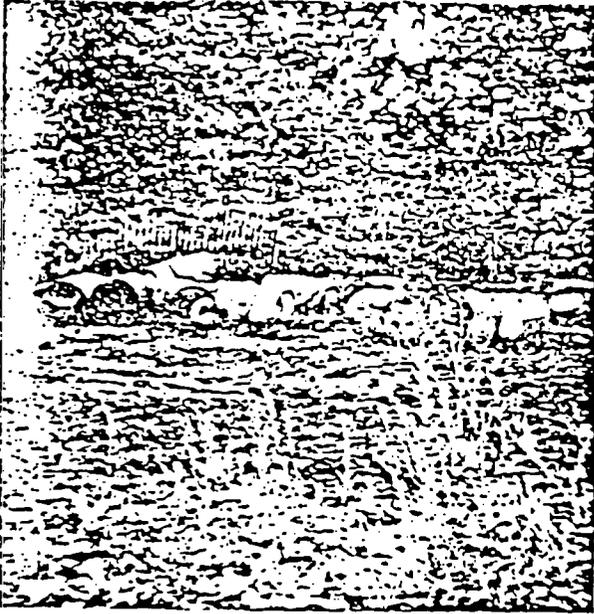
BORING #1

DRAIN

SAMPLES

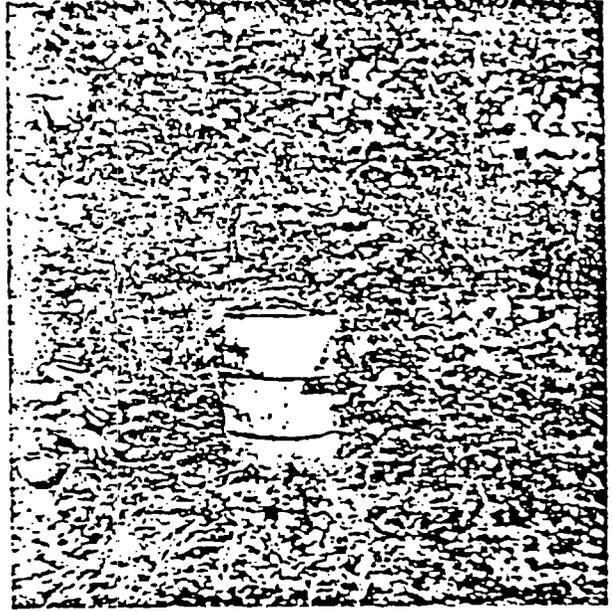
A-J - taken by M Field's
"1" - "1" at various depths (5 ft)
taken by G. Hall

mark estimate, etc.



#1

6-29-83
1015



Align to #1
in trees

#2

6-29-83
1015



Spot #1/2
taken from
#2

#3

6-29-83
1018



Sof #3
Facing
road

#4

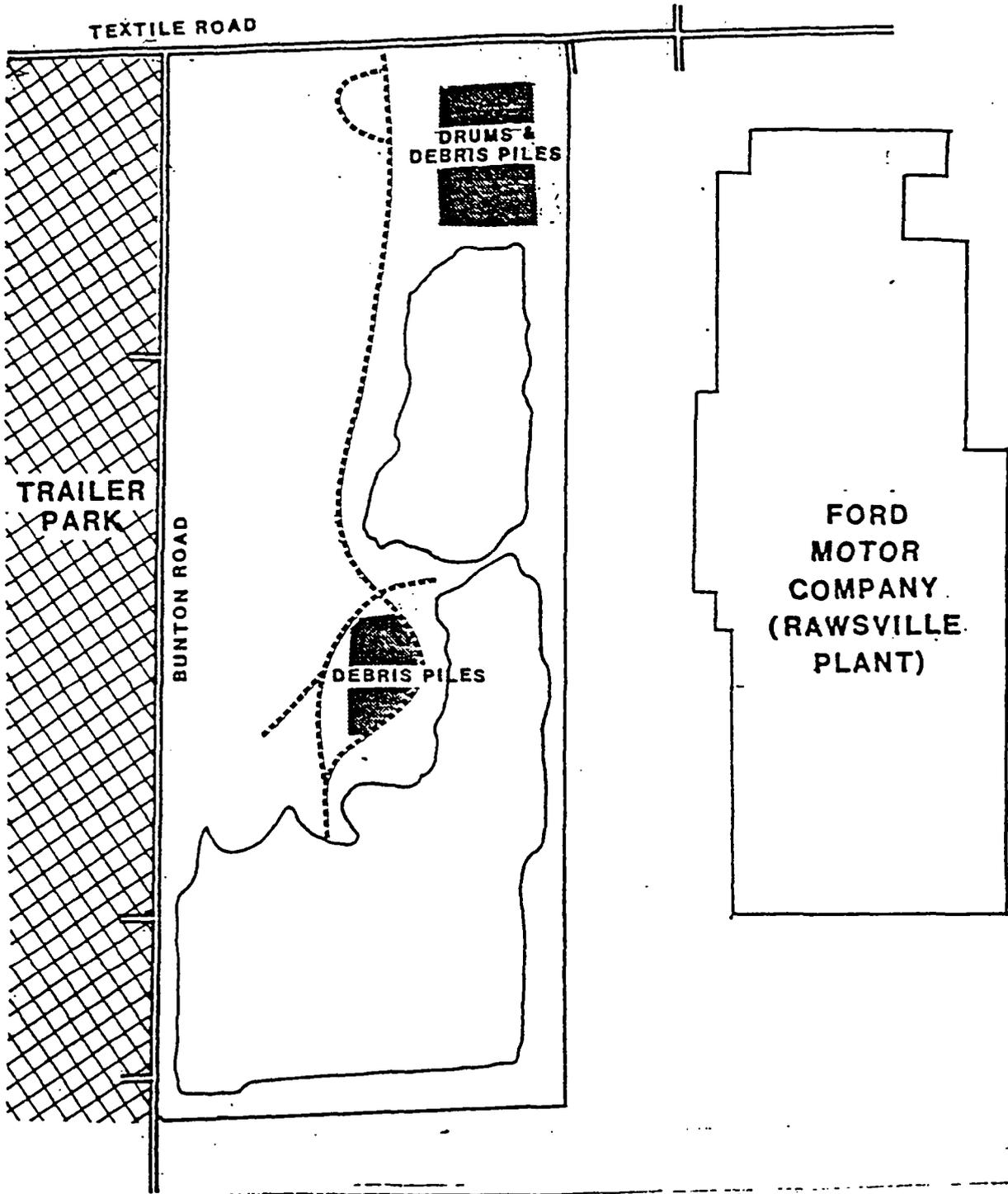
6-29-83
1019



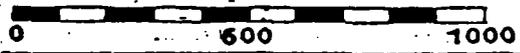
Semi New
vehicle
stage
(90)

#5

6-29-83
1020



SCALE IN FEET



ecology and environment, Inc.
 111 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604

SCALE:		DRAWN BY
DATE:		REVISED

FIGURE 4
WELL LOCATION MAP

HOLTZMAN-SILVERMAN SITE	DRAWING NUMBER
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