

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Electro Tech Metal Finishing - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #1
Initial and Final POLREP
Electro Tech Metal Finishing

Vancouver, WA
Latitude: 45.6733280 Longitude: -122.5327920

To:
From: Jeffrey Fowlow, On-Scene Coordinator
Date: 3/15/2010
Reporting Period: March 4-15, 2010

1. Introduction

1.1 Background

Site Number:	10HJ	Contract Number:	
D.O. Number:		Action Memo Date:	9/11/2009
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/4/2010	Start Date:	3/4/2010
Demob Date:	3/15/2010	Completion Date:	3/15/2010
CERCLIS ID:	WAN001002811	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

The former Electro Tech facility (ceased business in 2009) is located in a small business/light industrial park east of downtown Vancouver. The business park is comprised of 13 rental units of which Electro Tech operates out of 4 units: Units 4, 5, 6 and 7. Brad Reiner also rents Unit 10 for personal storage. The entire business park is owned by Ms. Sally Biffle, who also owns J&S Steel, a company operating out of the same business park. The business park is surrounded by light industrial and commercial businesses. Residential neighborhoods are located within 500 feet of Electro Tech on the north, south, and west sides.

1.1.2.1 Location

The City of Vancouver, Washington, is the county seat of Clark County. Vancouver is located on a rolling plain (150-290 feet above mean sea level) above the Columbia River, which separates Vancouver from Portland, Oregon. The population of Vancouver is 164,500 and the city occupies 48.5 square miles. The Cascade Mountains are located approximately 30 miles east of Vancouver and the Pacific Ocean is approximately 70 miles west.

1.1.2.2 Description of Threat

Arsenic, cadmium, chromium, lead, and other metals have been detected in sludge samples collected from a storm sewer following the 2007 spill at the Electro Tech site and in subsurface soils and groundwater samples collected from the property. Those metals are hazardous substances as defined by sections 101(14) and 101(33) of CERCLA, as amended, 42 U.S.C. §9601(14) and (33).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Inside the Electro Tech shop are seven vats of various dimensions and eight 55-gallon drums. Five of the seven vats contain metal polishing solutions and two of the 55-gallon drums contained liquid contents (an estimated total of 1000-2000 gallons). The owner of the business claimed that, based on generator knowledge, these substances are RCRA hazardous wastes. Metals detected in samples collected from Electro Tech include arsenic, cadmium, chromium, copper, lead, nickel, and zinc. These metals were detected in sludge samples collected from storm drains immediately outside of the facility following a 2007 spill from Electro Tech where metal-polishing liquids were released from the shop and flowed into the storm drains.

The presence of metals and other contaminants in soil and groundwater samples collected from the property may indicate additional releases from Electro Tech and/or other tenants through a common septic system and/or other discharge points such as holes or cracks in the shop building. The floor of the shop

occupied by Electro Tech was covered by equipment and therefore could not be examined. The floors, walls, ceiling, and other hard surfaces of the building itself are suspected to be contaminated based on staining, pitting, and other signs of chemical corrosion. Characterization of the wastes and an evaluation of the shop interior will occur as part of the removal action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

There were 3 main elements to the SOW of this Removal Action.

Removal of Hazardous Substances:

On Thursday, March 4, 2010, a total of 1204 gallons of corrosive liquids were removed via a vacuum truck with a stainless steel tank. The liquids were transported to PSC in Tacoma, WA for treatment and disposal.

On Monday, March 8, 2010, ten drums of sludge (corrosive solids), 2 drums of flammable liquid, 1 drum of alkaline solids, and 1 five-gallon bucket of acid liquid were transported to PSC in Tacoma, WA for treatment and disposal.

On Thursday, March 11, 2010, a total of 630 gallons of water used to decontaminate the ceiling, floor, and walls of the Electro Tech shop were transported as hazardous waste (liquid) to PSC in Tacoma, WA.

On Thursday, March 18, 2010, one drum of oxidizer solid was transported to PSC in Tacoma, WA, for treatment and disposal.

Removal of Hazardous Debris:

From March 6 to March 11, 2010, 3 roll off boxes containing a combined 40 cubic yards of contaminated debris was removed from the Electro Tech facility. The contaminated debris included vats (cut apart), paper, carpeting, wood, poly liners, PPE, etc. The debris was transported as hazardous waste (solid) to the Chem Waste Management landfill in Arlington, Oregon.

Several reusable pieces of equipment of relatively high value were decontaminated by pressure washing and scrubbing with detergent. The decontaminated items included power tools (drill press, forklift) that the owner (Brad Reiner) intends to retain for personal use and 3 tanks, 2 pieces of equipment (rectifier and chiller), and several industrial items (I-beams, hangers). The industrial items were given to a local company for use exclusively in their plating business.

A stainless steel tank was cut into pieces, decontaminated and recycled at Metro Metals in Portland, OR.

Decontamination of Building Surfaces:

After all hazardous substances and hazardous debris were removed from the building, the building surfaces were washed to prevent loose contamination from being spread outdoors and presenting a threat to human health and the environment. The ceiling and walls were lightly washed and lightly scrubbed to remove loose contaminants. The floor of the facility was highly contaminated with solid powder, liquid, and sludge from the polishing operation. The floor was swept to remove loose contamination and then mechanically abraded using a disc sander to remove more persistent contaminants. After sanding the rough, dried crystalline solids to smooth the surfaces, the entire floor was pressure washed. All water used to decontaminate the ceiling, walls, and floor was captured using a vacuum truck and disposed. EPA observed all pressure washing operations and no water was allowed to release from the building. A moderate amount of staining remained on the facility floor following sanding and pressure washing. The OSC determined that this persistent staining did not constitute a substantial threat to human health or the environment.

2.1.2 Response Actions to Date

This Initial and Final POLREP details all response actions to date. No additional response activities are anticipated at the Electro Tech facility.

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

This Removal Action was completed by the PRP under an Administrative Order on Consent.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Corrosive liquids	Liquid	1204 gallons			PSC, Tacoma
Corrosive solids	Sludge	10 X 55 gal drums			PSC, Tacoma
Flammable liquids	Liquid	2 X 55 gal drums			PSC, Tacoma
Alkaline solids	Solids	1 X 55 gal drum			PSC, Tacoma
Corrosive liquid (Acid)	Liquid	1 X 5 gal bucket			PSC, Tacoma

Oxidizer	Solid	1 X 55 gal drum			PSC, Tacoma
Decontamination water	Liquid	630 gallons			PSC, Tacoma
Solid waste debris	Solid	40 cubic yards			Chem Waste Mgmt, Arlington

2.2 Planning Section

2.2.1 Anticipated Activities

No further activities are anticipated.

2.2.1.1 Planned Response Activities

All wastes have been removed from the site. It is not anticipated that this site will be referred to any other program or agency.

2.2.1.2 Next Steps

To comply with the terms of the AOC, the PRP shall submit a final report of removal activities.

2.2.2 Issues

The goals described in the Action Memo have been achieved. Hazardous substances contained in the tanks, vats, and drums have been removed and sent to a TSD facility. By removing the liquids, the threat of further release of hazardous substances to the storm drains in the parking lot were eliminated. Contaminated debris was removed and sent to a hazardous waste landfill. Contaminated equipment was decontaminated and removed from the property, sent for reuse, or recycled. The building surfaces were washed to remove loose contamination, thereby reducing the threat to future tenants and /or release of additional contamination into the environment. After removal of equipment, debris, and surface contamination, EPA was able to examine the floor of the facility to evaluate the potential for contaminants to have migrated or drained through cracks, holes, or drains in the floor. These passageways, if present, would not have been visible due to the surface obstructions while the business was operating. Although there were cracks in the concrete floor and one capped (probable) toilet drain in the floor, no evidence was observed that would indicate a substantial route of contamination to the soil below the concrete floor of the building.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

No injuries were reported during this removal action.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

No information available at this time.

4. Personnel On Site

1-EPA OSC
1-START
3-PRP Contractors

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.