U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Modern Plastics - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
Site Mobilization and Initial Activities
Modern Plastics
Benton Harbor, MI
Latitude: 42.1213234 Longitude: -86.4545362

To: Charles Gebien, US EPA
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Date: 6/18/2010
Reporting Period: 6/14/2010 - 6/18/2010

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	2/17/2010	**Start Date:**	2/17/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.2 Site Description

This Site is a former plastic manufacturing facility that produced custom thermoset and thermoplastic molded plastic components for the automotive and various other industries. Modern Plastics ceased operations in August of 2008 and the company was placed under bankruptcy protection. A majority of the facilities equipment has been liquidated. Eight PCB containing transformers remain inside the building. All transformers, with the exception of one, had a secondary containment berm at one time; however, they have all been compromised. The roof is dilapidated and leaking. The indoor storm drains flow directly into Ox Creek, which runs through the southern portion of the property

1.1.2.2 Description of Threat

One of the PCB transformers has leaked and bypassed its secondary containment, migrating on to the building floor. With a leaking roof and floor drains that flow into Ox Creek, the facility presents a possible PCB release in to the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Eight PCB-containing transformers were found on Site. A previous visit and sampling event by U.S. EPA Pesticides and Toxics division, yielded analytical results of up to 688,000 ppm of PCB oils leaking from a single transformer.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On June 14, 2010, U.S. EPA, the Superfund Technical Assistance and Response Team (START), and Emergency and Rapid Response Services (ERRS) mobilized to the Site. ERRS personnel set up the site support zone and START personnel conducted a full inventory of the drums being stored in the Hazardous Waste Storage Shed on the east side of the property. A trash container was observed near the Storage Shed which was cracked and leaking oil on to the pavement. ERRS personnel secured the container in poly sheeting and staged it on to a pallet until it can be properly profiled and disposed. A visit to the office of the Benton Harbor City Manager was conducted, but the manager was unavailable.

On June 15, 2010, ERRS personnel cleaned out Area #4 and prepped it for use as the Contamination

Reduction Zone (CRZ). The CRZ includes a decontamination line, emergency shower, and containment curtain to prevent the migration of potential hazardous materials. START and ERRS personnel swept the facility for all mercury containing devices including light bulbs, switches, and relays. Mecrury waste was stored properly until it can be properly disposed. START additionally conducted air monitoring of all work activities within the facility using a MultiRAE five gas detector. Area #3 was identified as a potential staging area for Resource Conservation and Recovery Act (RCRA) and Toxic Substance and Control Act (TSCA) wastes.

On June 16, 2010, the Benton Harbor City Fire Department met with the U.S. EPA at the site for information and updates regarding site activities. ERRS personnel cleared Area #3 of plastic injection molding pellet containers and excess trash. The cleared area was then delineated for staging of RCRA and TSCA wastes until proper profiling and disposal could be arranged. START conducted air monitoring while work commenced inside the facility. ERRS and START began collecting and staging all small container waste from the facility in to its proper staging area.

On June 17, 2010, ERRS personnel opened a water main vault and pumped out excess rainwater in preparation for a representative from the Benton Harbor Utility Company to charge fire hydrants for emergencies and decontamination on site. Upon turning on the water, it was discovered that two fire water lines inside the facility had cracked and were leaking water in to the facility. The water was again shut off and a private plumbing contractor was contacted to fix the problem. START personnel located all emergency exits in the facility and proceeded to mark them with fluorescent spray paint and add them to appropriate maps. ERRS personnel continued to collect and stage all wastes from the facility in to its proper staging area.

On June 18, 2010, ERRS personnel continued staging waste in Area #3. Waste drums from the hazardous waste storage shed were moved in to the main building and categorized accordingly. A plumber was contracted to tap in to the water main with an alternate line to provide water access to the Site. All property and facility entrances and exits were secured. A security contractor was brought in to provide security services during the nights and weekends.

2.1.2 Response Actions to Date
Emergency Response actions were conducted in February to drain leaking PCB Transformer. Surface cleaning of the contaminated floor where spill occurred was conducted to mitigate spread of PCB oils

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

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities
Staged waste will be categorized, profiled, consolidated (as necessary), and disposed of.

PCB transformers will be removed from the facility and disposed.

PCB contaminated sections of the floor in Area #2 will be cleaned and sealed with epoxy.

2.2.1.1 Planned Response Activities
All hazardous materials will be collected and profiled for disposal.

All PCB transformers will be removed from the facility and disposed.

2.2.1.2 Next Steps
An ERRS chemist will be on site next week to identify and sperate possible incompatible in the upstairs laboratory area. The small chemical containers will then be placed in to overpacks and disposed.

2.2.2 Issues
Poor maintenance of the water lines inside the building since bankruptcy has resulted in cracks in several main's throughout the facility. A plumber was called to tap in to the water line before it enters the building to allow for water delivery to the Site.

Site personnel are examining best removal methods for the PCB transformer in the boiler room. The transformer is too large to remove from the overhead door next to it, and it may be too costly and time consuming to remove the boilers that block it in. It is probable that this single transformer will be drained then flushed, with the carcass left in place. EPA will contact TSCA personnel to discuss this option.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$230,000.00	$30,339.93	$199,660.07	86.81%
TAT/START	$25,000.00	$10,602.74	$14,397.26	57.59%
Intramural Costs				
Total Site Costs	$255,000.00	$40,942.67	$214,057.33	83.94%

* 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

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

U.S. EPA
Michigan Department of Natural Resources the Environment (MDNRE)
City of Benton Harbor

4. Personnel On Site

US EPA
Weston Solutions
Environmental Restoration

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.

POLREP #2 Last Updated 6/18/2010