

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
Removal Activities  
Modern Plastics  
Benton Harbor, MI  
Latitude: 42.1213234 Longitude: -86.4545362

**To:** Charles Gebien, US EPA  
Linda Nachowicz, US EPA  
Ronald Carter, City of Benton Harbor  
Nathan Whitmyer, Michigan DNRE  
Mark Palermo, US EPA

**From:** Mike Beslow, OSC

**Date:** 7/2/2010

**Reporting Period:** 6/21/2010 - 7/2/2010

## 1. Introduction

### 1.1 Background

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

### 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 facility's 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 21, 2010, ERRS personnel organized all waste containers in to appropriate waste streams in the waste material storage area and numbered the containers for tracking. ERRS chemists donned Level B PPE and began taking samples of each container to allow for proper profiling and eventual disposal. Containers that were found to contain waste oil were consolidated in to totes in the storage area.

On June 22 and 23, 2010, ERRS chemists continued to profile waste containers and arrange them in to proper waste streams in the waste storage area. Small containers were inventoried and lab packed as appropriate. ERRS personnel donned Level C PPE and entered the recessed pit in Area #3 to remove all small containers and drums. Empty waste containers were crushed and disposed of in accordance with

the Site plan. ERRS T&D Coordinator and Field Chemist demobilized from the Site.

On June 24 and 25, 2010, ERRS personnel continued consolidating wastes, crushing empty waste containers, and reorganizing waste containers in to their appropriate waste streams. ERRS personnel began assessing Transformer #7 and disassembling outer casing.

On June 28 and 29, 2010, a scissor lift and large forklift were delivered to the Site to assist in the efficiency and safety of disassembling the transformers. ERRS continues disassembling Transformer #7. The conductor paneling and conductor box were removed and surrounding cables and pipes were cut back to allow for removal with a crane. Work is complete on Transformer #7 and work mobilizes to Transformer #3.

On June 30 and July 1, 2010, dismantling activities continue on Transformer #3. Outer plating and switch boxes need to be removed individually from the transformer before it can be removed. A small PCB oil leak occurred when a nut was removed from a porcelain flange during dismantling. The leak was quickly stopped and the oil was contained in a steel drum. No PCB oils escaped the secondary containment of the transformer being worked on. While donning Level C PPE, ERRS used Oil-Dri to clean up the minimal amount oil that leaked on to the platform's secondary containment and the area was thoroughly washed with soap and water. All surrounding cables and pipes were cut back to allow for the transformer to be removed using a crane. Transformer #4 was unbolted and prepped for removal. ERRS personnel cut all access ladders to the roof to prevent unauthorized access. U.S. EPA also notified the Benton Harbor police of possible security issues and requested additional patrolling to supplement the overnight and weekend security guard.

On July 2, 2010, ERRS personnel mobilized to Transformer #2 to begin dismantling for removal. An additional transformer was found on the Transformer #2 scaffolding. It is labeled as a "non-PCB" transformer, although analytical testing will be used to confirm.

**2.1.2 Response Actions to Date**

Please see previous pollution reports

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

**2.1.4 Progress Metrics**

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

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

The remaining PCB transformers will be removed from the facility and disposed of.

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

**2.2.1.1 Planned Response Activities**

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

Drums and small containers will be consolidated into approximately 7 waste streams and disposed of properly.

**2.2.1.2 Next Steps**

ERRS personnel will continue dismantling the remaining transformers. A crane will arrive next week to assist in the removal of each transformers from the facility.

**2.2.2 Issues**

Site security has become an issue with suspected instances of breaches to the Site. Additional precautions and measures, including motion detectors, have been established to secure the Site, and local police have been notified of the occurrences.

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. This will result in a PCB transformer being left in the facility, but the threat of spill will be mitigated.

**2.3 Logistics Section**

No information available at this time.

**2.4 Finance Section**

**Estimated Costs \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$230,000.00	\$72,186.50	\$157,813.50	68.61%
TAT/START	\$25,000.00	\$19,306.65	\$5,693.35	22.77%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$255,000.00</b>	<b>\$91,493.15</b>	<b>\$163,506.85</b>	<b>64.12%</b>

\* 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.