

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Removal Activities
Modern Plastics
Benton Harbor, MI
Latitude: 42.1213234 Longitude: -86.4545362

To: Charles Gebien, US EPA
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From: Mike Beslow, OSC

Date: 7/8/2010

Reporting Period: 7/2/10 - 7/9/10

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 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 July 6, 2010, an 8 ton crane was mobilized to the Site to assist in the removal and staging of PCB transformers. ERRS personnel continued preparing transformer #2 for removal by dismantling ancillary equipment and removing additional obstructions. All scrap metals generated from transformer removal activities were organized by type and then staged near the contamination reduction zone (CRZ).

On July 7, 2010, ERRS, START, and U.S. EPA personnel conferred and verified the extent of the PCB containment zone in Area #2 (near transformer #1). The PCB containment zone has been divided in two different zones. A hot zone, which encompasses the area beneath transformer #1 and a fifteen foot radius around it, will be decontaminated with dedicated tools and rinse water will be containerized for disposal.

The remaining area in the PCB containment zone will be decontaminated with separate tools and the waste water will be profiled for disposal. A sample was taken from transformer #9 to verify the absence of PCBs in the insulation oil. Additional samples were taken from oil in the recessed pit and solids cleaned from Area #2 to determine levels of PCBs.

On July 8, 2010, ERRS personnel continued decontamination activities in Area #2. A transformer storage area with secondary containment was built in Area #3 within the TSCA waste area. Each PCB transformer will be removed from its current location (with the exception of transformer #8 which will be drained due to access issues, and transformer #9, a non-PCB Transformer) and staged in the transformer storage area. ERRS personnel utilized the crane and forklift to remove transformer #7 and stage it in the transformer storage area. Transformers #5 and #6 were prepped for removal.

On July 9, 2010, ERRS personnel utilized the crane and forklift to remove transformers #5 and #6 and staged them in the transformer storage area. The crane and forklift were mobilized to transformer #3 in preparation of removal. Additional ERRS personnel continued decontamination activities in Area #2. A sample was taken from the rinse water generated during decontamination of the PCB containment area. All samples will be submitted to a certified lab for analysis. All entrances and exits to the Site were inspected and sealed for the weekend.

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>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

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

PCB contaminated sections of the floor in Area #2 will be 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 remove remaining PCB transformers and stage them in the transformer storage area while awaiting disposal.

The recessed pit area will be decontaminated and properly secured.

2.2.2 Issues

The poor conditions of the roof have resulted in leaking water in to the PCB containment zone. Additional options will be explored to help limit the amount of rain water that enters the floor can be properly sealed.

The PCB transformer in the boiler room is too large to remove from the overhead door next to it, and it will be too costly and time consuming to remove the boilers that block it in. 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 *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$230,000.00	\$100,357.02	\$129,642.98	56.37%

TAT/START	\$55,000.00	\$25,710.72	\$29,289.28	53.25%
Intramural Costs				
Total Site Costs	\$285,000.00	\$126,067.74	\$158,932.26	55.77%

* 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.