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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #5**
Removal Activities
Modern Plastics
Benton Harbor, MI
Latitude: 42.1213234 Longitude: -86.4545362

To: Charles Gebien, US EPA
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Date: 7/28/2010
Reporting Period: 7/12/2010 - 7/28/2010

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 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 12, 2010, ERRS personnel re-mobilized to the Site and began dismantling transformer #1. All tools and PPE generated while working in the hot zone surrounding transformer #1 were containerized and disposed of separately as PCB waste. ERRS personnel utilized the 8-ton crane to remove transformers #3 and #4 from their scaffolding and staged them in the TSCA waste storage area. The transformer storage area was equipped with a berm and plastic sheeting to protect against a potential release inside the facility.

On July 13, 2010, ERRS personnel utilized the 8-ton crane to remove transformer #2 from it's scaffolding and stage it in the transformer storage area. Rainwater that had accumulated in the area near transformer

#1 was removed and containerized for proper disposal. Dismantling activities continued on transformer #1.

On July 14, 2010, ERRS personnel completed the dismantling of transformer #1 and it was removed from the scaffolding and staged in the transformer staging area. The scaffolding and surrounding area was decontaminated with caustic soap following the removal of transformer #1.

On July 15, 2010, a 15 yard roll off was mobilized in to the facility, double lined with polyethylene, and dedicated to PCB contaminated solids. ERRS personnel collected all PCB solids and cut them in to the proper size for disposal in the roll off bin. The transformer #3 scaffolding was decontaminated with caustic soap and all rinse water was containerized for proper disposal.

On July 16, 2010, ERRS personnel located all fire extinguishers in the facility and stored them near the waste storage area to await disposal on Monday. The TSCA waste storage area was cleaned and the waste stream lines were reorganized. All entrances and exits to the facility were sealed and checked in preparation for the weekend.

On July 19, 2010, it was determined that the positioning of transformer #8 made removing it cost prohibitive. In response, it was determined that transformer #8 would be drained of all PCB oil and the transformer carcass would be rinsed with diesel fuel. ERRS personnel disassembled attachments on transformer #8 and began draining out PCB oil in to drums for disposal. Preparation for pressure washing also began in the recessed pit area.

On July 20, 2010, ERRS personnel finished draining PCB oil from transformer #8 and rinsed the carcass with diesel fuel. The diesel fuel was then drained from the transformer in to drums and all drums were labeled as PCB waste for disposal. ERRS personnel also consolidated all flammable waste in the TSCA waste storage area. All empty drums were crushed or cut up as necessary,

On July 21, 2010, ERRS personnel entered the recessed pit and began moving all debris in the pit area. It was determined that several layers of waste oil had settled on the floor. ERRS began shoveling up waste oil and debris and placing it in to drums for proper disposal.

On July 22, 2010, ERRS personnel noticed dripping PCB oil from the scaffolding of transformer #1. It was determined that some of the leaked PCB oil remains inside the scaffolding plating. All debris in the recessed pit was organized and the pit floor was power washed to remove waste oil. The waste water from power washing was determined to be non-hazardous and it was directed in to the sump.

On July 23, 2010, ERRS personnel cut up all scrap metal on Site and placed it in to the proper roll off bin for disposal. All waste oil in the TSCA waste area was consolidated in to several totes. The Site entrances and exits were checked and sealed in preparation for the weekend.

On July 26, 2010, ERRS personnel began preparation for the decontamination of the oil/water separators located adjacent to Ox Creek. The immediate area and lid were cleared of all debris and the safety railings were removed to allow access. A pressure washer and generator were staged near the separator. Inside the facility, an area was cleared to allow access to a vacuum truck which would be utilized in the removal of waste oil from the separator.

On July 27, 2010, a vacuum truck and supporting tanker arrived on Site to drain the oil/water separator of all waste oil. The vacuum truck was staged inside the facility and hoses were run to the backside of the building and in to the separator. ERRS pumped a total of approximately 9,000 gallons of waste oil and water. The inside of the separator was decontaminated with the pressure washer and the lids were re-secured.

On July 28, 2010, a second vacuum truck arrived on Site and was staged near the northern access to the recessed pit. The vacuum truck was utilized to remove all excess water from the pit area. ERRS personnel donned Level C PPE (personal protective equipment) and pressure washed the pit floor. The oil inside transformer #9 (analytical testing found it to be non-hazardous) was drained in to the vacuum truck and disposed.

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

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

2.2 Planning Section

2.2.1 Anticipated Activities
The remaining PCB contaminated sections of the floor in Area #2 and contaminated scaffolding will be sealed with epoxy.

2.2.1.1 Planned Response Activities

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

2.2.1.2 Next Steps

2.2.2 Issues

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	$191,251.41	$38,748.59	16.85%
TAT/START	$55,000.00	$35,436.55	$19,563.45	35.57%
Intramural Costs				
Total Site Costs	$285,000.00	$226,687.96	$58,312.04	20.46%

* 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.