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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #6**
Demobilization
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: 8/3/2010
Reporting Period:

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 29, 2010, ERRS crews applied a coat of epoxy to the scaffolding that housed the leaking PCB transformer. The scaffolding had been previously cleaned, but worries surfaced that the oils may be able to escape the cleaning of hard to reach areas. The coat of epoxy allowed a visual confirmation that all small areas had been sealed, and this saved the cost of demolishing the structure, and disposing it as TSCA waste.

On July 30, 2010, ERRS crews finished the application of epoxy to the scaffolding, and began applying epoxy to the contaminated concrete floors around the transformer spill site. The crew also began operations of solidifying non-haz waste from drums. This was completed using oil absorbent and

concrete. All team members departed site for the weekend; while site security resumed 24 hour guard.

On August 2, 2010, all personnel re-mobilized to the site and applied a second coat of epoxy to the leaking transformer scaffolding. Two outdoor staging areas were constructed and secondary containment was built. All transformers and approximately half the drums were moved outdoors into staging area to prepare for T&D. All Haz was placed under surveillance of overnight security guard. Transformers were covered to protect them in the event of rain.

On August 3, 2010, all 35 PCB drums were loaded onto Clean Harbors flat bed truck, then all PCB transformers were loaded and shipped. ERRS continued crushing empty drums, and applied second coat of epoxy to floor. A perimeter coat of epoxy was applied to ensure all PCB contaminated concrete was covered. Paint was applied out to the concrete that tested below actionable levels.

On August 4, 2010, boom was removed from creek, and no sheen was observed. Remaining waste was overpacked and staged in the fenced area next to the contamination reduction zone (CRZ). Roll off boxes were staged for following day's pick up. Security demobed from site.

On August 5, 2010, all personnel packing operations in preparation for demob of site. Outside water supply was shut off, pipe was disconnected. Storage locker, next to CRZ, inside facility, was secured and locked. All personnel demobed, with exception of cost accountant. Cost accountant will remain on site, one additional day to demobilize work trailers.

On August 18, 2010, OSC Stavros Emmanouil was onsite to oversee the Transportation and Disposal of all remaining wastes on site. This was completed, and the site was locked back up. This concluded the US EPA's on site work.

2.1.2 Response Actions to Date
Please see previous pollution reports

2.2 Planning Section

2.2.1 Anticipated Activities
No further site activity Anticipated

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps
Closeout Paperwork
Publish Final Polrep

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.

POLREP #6 Last Updated 10/5/2010