

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Paw Paw Plating - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Continuation of Removal Action
Paw Paw Plating
B5WV
Paw Paw, MI
Latitude: 42.2113869 Longitude: -85.8949757

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From: Tricia A. Edwards, OSC

Date: 2/23/2011

Reporting Period: 2/8/2011-2/25/2011

1. Introduction

1.1 Background

Site Number:	B5WV	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:	2/7/2011	Start Date:	2/7/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

Paw Paw Plating started primarily as a custom electroplating operation in the 1950's and stopped operations in December 2009. The site is about 1.8 acres, is not fenced and contains an abandoned building with chemicals and other hazardous materials. The site is located at 139 Commercial Ave., Paw

Paw, Michigan. Cadmium, chromium, silver, gold, nickel, copper and cyanide were used in the electroplating process. The company also performed metal processing such as machining, polishing and painting which included the use of Trichlorethylene (TCE).

There are a variety of abandoned hazardous materials in the building including plating baths containing heavy metals, drums of plating feed stocks, drums of hazardous waste, and a number of different size containers with a wide variety of chemical compounds. Plating solutions include but are not limited to cyanide and chromium. The presence of containers, drums and vats without secondary containment could result in contaminating soil and ground water, and pose a threat to nearby residents and businesses if a fire was to occur.

Past investigation activities by the Michigan Department of Natural Resources and Environment indicated that contaminants were released into the storm sewer that discharges directly in to the Paw Paw River and also were discovered in a municipal water well that served the village of Paw Paw. Halogenated volatile organic compound (HVOCs) contamination, including TCE was identified in ground water.

1.1.2.1 Location

Paw Paw Plating located at 139 Commercial Avenue in Paw Paw, Van Buren County, Michigan 49079.

1.1.2.2 Description of Threat

Cyanides, Acids, Bases, Oxidizers, Toxics, Heavy Metals

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

ERRS mobilized office trailers and began site set up on Monday, February 7. U.S. EPA and START mobilized to the site on February 8.

The existing infrastructure within the building allowed for the electricians to power the building. The non-essential equipment within the building will be de-energized by the electricians while on site. The furnaces were not operable, so propane and heaters were delivered to the site.

The electrical inspector for the office buildings is to conduct final inspection the morning of February 9. Water connection should also be established as of February 9.

ERRS has established the decontamination line within the building, and has begun organizing the containers of waste on site. Once all drums and small containers have been segregated, the labeling and sampling of waste will commence. ERRS also intends on measuring the vats in the plating room to establish volumes of material for disposal.

START deploys 4 Area RAEs and the Data Ram daily. 2 of the AreaRAEs are inside of the building. One is maintained near the plating room and the other is outside of the storage/grinding room. 2 AreaRAEs are outside of the building. One unit is placed to the north and one to the east.

The drums and small containers were collected and segregated inside of the building. Flammables were staged in the existing flammable room and all other drums were staged in a designated storage area. ERRS labelled each of the drums, small containers (5gallon and greater), and vats with unique identification numbers. (49 containers, 60 drums, and 40 vats) Once all of the containers were labelled, they were sampled. ERRS crews conducted all of the sampling in Level B PPE. The samples would be used by the field chemist to formulate disposal groups.

The field chemist fingerprinted and logged the results for each of the samples. The following information was recorded for each sample: physical state, color, organic, ph, ignitability, oxidizer, sulfide, and cyanide. Based on the fingerprint results, the like samples were composited for disposal groups. The composites were then sampled and shipped off site to a laboratory for analysis. 17 composite samples were sent for analysis.

Once the electricity was on in the building, it became apparent that the grinding room had a lot of accumulated dust on the equipment, floors, benches, etc. The area was blocked off to prevent any foot traffic and potential for it to become more dispersed throughout the building. The dust was sampled and found to contain heavy metals exceeding the direct contact levels of established by the Michigan Department of Natural Resources and Environment, Part 201 Direct Contact levels for Industrial area. ERRS sealed off the entrance ways to grinding room. The room was cluttered with various tools and an inoperable, and ineffective ventilation system. The crew dismantled the ventilation system and opened up a floor trench to determine the extent of contamination. Drum vacuums were brought in to vacuum the area. Once the trench, floors, equipment, etc. were cleaned, scaffolding was brought into allow for safe work on the overhead piping and lighting.

There is an out building on site where it appears that formerly, poly drums were cleaned and cut up for disposal. Some fully-intact drums remained in the building. ERRS completed cutting the remaining drums and staged them for recycle or disposal. Currently, ERRS is trying to identify a recycling facility that will take the cut up poly drums for plastic recycling.

A small laboratory also was formerly in operation on site. Miscellaneous chemicals from the laboratory and those collected throughout the building were gathered into one area for the lab-pack chemist. The ERRS

lab-pack chemist segregated, inventoried, and packed up the small lab chemicals into compatible group for disposal. A detailed packing list for each of the lab-packs was developed by the field chemist. The packing list will be provided to the disposal facilities for approval. The lab chemicals were packed in DOT approved shippable containers and are staged on site. 14 different waste streams were packaged for disposal.

In addition to the lab-pack chemical, hundreds of small containers containing paint or paint-related flammable materials were packaged into DOT approved cubic yard boxes for disposal. 3 cubic yard boxes are currently staged on site, awaiting disposal.

Samples were taken from six vats identified to contain heavy metals in solution. The samples will be analyzed for metals. Based on the metal content, the potential to recycle of these solutions will be evaluated.

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

Paw Paw Plating went out of the business when the owner died in December 2009. The estate for the deceased owner does not have the funds to conduct the clean up.

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

Completion of the vacuuming of the dust in the grinding room and removal of accumulated dust within the vicinity.

Delivery of totes and drums for waste.

Compositing drums and small containers, per the disposal groups established by the field chemist into DOT approved containers for disposal.

Identification of a facility to manage the cut up poly drums.

Receipt of sample analysis for disposal. ERRS will prepare requests for quote for disposal for EPA approved CERCLA facilities for disposal.

Begin the removal of piping and ancillary equipment in the plating room and water treatment room so that transfer of liquids can be removed safely and efficiently.

2.2.1.1 Planned Response Activities

The main focus over the next two weeks will be pumping the liquids from the vats into drums and totes for disposal. Concurrently, the field chemist will prepare the waste profiles for disposal at EPA-Approved CERCLA facilities. Once all of the waste has been profiled and approved for disposal, shipment of the waste will be coordinated.

ERRS will continue removing all of the piping and equipment in the plating room and the water treatment room. Following the shipment of waste off site, ERRS will begin the process of removing the vats from inside of the plating and water treatment rooms. The majority of the vats are approximately 48" deep. There is an elevated floor, so approximately 36" of the vat is beneath the floor and 12" is above. Due to this construction, it is difficult to determine the amount of contamination below the vats, although it is evident that there is contamination and build up of solids.

Once the vats have been removed, a subsurface investigation will be conducted. In addition, a plan will be developed and implemented to manage the solid waste.

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	\$250,000.00	\$70,271.00	\$179,729.00	71.89%
TAT/START	\$25,000.00	\$17,000.00	\$8,000.00	32.00%
Intramural Costs				
USEPA - Direct	\$0.00	\$6,660.00	(\$6,660.00)	0.00%
USEPA - InDirect	\$0.00	\$13,320.00	(\$13,320.00)	0.00%
Total Site Costs	\$275,000.00	\$107,251.00	\$167,749.00	61.00%

* 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

No information available at this time.

4. Personnel On Site

U.S. EPA
 START - Weston Solutions
 ERRS - Environmental Restoration (ER)

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.