

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
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: 3/10/2011

Reporting Period: 2/26/11-3/11/11

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

Refer to earlier POLREPS for past response actions.

Air monitoring is conducted daily on site. START maintains 4 AreaRAEs and 1 Multi-RAE while work is being conducted.

During this reporting period, ERRS removed most of the piping and ancillary equipment in the plating room and water treatment room so that transfer of liquids could be removed safely and efficiently.

ERRS had totes and drums delivered to the site for the bulking of liquids for disposal. ERRS started bulking non-haz liquids from vats, drums, and small containers per the disposal groups established by the field chemist into DOT approved containers for disposal.

On Wednesday, March 9 it was identified that one of the totes that contained bulked liquids from three vats was off gassing. The Area RAEs alarmed "negative drift", and the ToxiRAE alarmed with a negative zero. The area was immediately evacuated of all personnel. EPA OSC, START, and ERRS donned Level B PPE to investigate the tote. A reddish/orange gas was venting from a tote in the staging area. The pH of the liquid was 0. The tote was moved to an area near an open door to allow for the off gassing to continue.

ERRS mobilized a field chemist to the site on Thursday, March 10. The chemist ran some bench tests to determine feasible options to address the tote. Dilution with water (50-50), dilution with water and caustic, and mixing with a caustic (2:1). Mixing with the caustic (2:1) that was available on site, was determined to be the most feasible choice. Three totes containing 200-gallons of caustic were prepared to slowly transfer 100-gallons of the acid into each tote. The transfer commenced on Friday morning. All work was conducted in Level B PPE. During the transfer, a foam was generated, but no heat was generated. All of the acid transfer was completed by the end of the day. ERRS will monitor the three totes periodically while the site is shut down next week.

A facility in Grand Rapids (Bata Plastics) was Identified that would accept the cut up poly drums for recycle.

Sample analysis for waste groups was received. ERRS is developing the necessary paperwork (ie profiles) to prepare requests for quote for disposal for EPA approved CERCLA facilities for disposal.

START prepared a statement of work (SOW) for the subsurface investigation for the Membrane Interface Probe and the GeoProbe work to be conducted. The SOW was shared with ERRS, who will three-bid the work. The forecasted start date is the week of April 11.

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>

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2.2 Planning Section

2.2.1 Anticipated Activities

- Bulking of liquids into totes and drums for disposal
- Preparation of waste profiles for disposal
- Coordination of transportation of waste
- Solicit bids for sub-surface investigation

2.2.1.1 Planned Response Activities

The Site will temporarily be shut down as of Saturday, March 12. Security will remain on site. ERRS will also inspect the property twice during the shutdown period. Operations will resume on Monday, March 21.

The focus over the next few weeks will be to continue 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. Shipment of the waste will be coordinated, once all of the waste has been profiled and approved for disposal.

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. Due to the construction and layout of the plating room, 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	\$162,901.89	\$87,098.11	34.84%
TAT/START	\$53,146.00	\$37,000.00	\$16,146.00	30.38%
Intramural Costs				
USEPA - Direct	\$0.00	\$11,565.00	(\$11,565.00)	0.00%
USEPA - InDirect	\$0.00	\$23,130.00	(\$23,130.00)	0.00%
Total Site Costs	\$303,146.00	\$234,596.89	\$68,549.11	22.61%

* 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

Michigan Department of Natural Resources & Environment (MDNRE)

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.

POLREP #3 Last Updated 5/3/2011