

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Continuation of Removal Action
Paw Paw Plating
B5WV
Paw Paw, MI
Latitude: 42.2113869 Longitude: -85.8949757

To: Jason El-Zein, U.S. EPA
Sam Borries, U.S. EPA
Mindy Clements, U.S. EPA
Thomas Marks, U.S. EPA
Mike Ribordy, U.S. EPA
Charlie Gebien, U.S. EPA
John Glover, U.S. EPA
Jerry Kujawa, U.S. EPA
Debbie Keating, U.S. EPA
Krause Patti, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Sherry Fielding, US EPA
David Chung, U.S. EPA
David Harn, MDEQ
David Heywood, MDNRE
Mark Ducharme, MDNRE
Larry Nielsen, Village of Paw Paw
Bruce VanOtteren, MDEQ
Dan Wyant, MDEQ
Bill Schuette, Michigan Department of Attorney General
Joe Walczak, MDEQ
Rodney Stokes, Michigan DNR
Wayne Babcock, U.S. Department of Interior
Robert Burr, U.S. Department of Interior
Lindy Nelson, U.S. DOI
NPFC USCG, USCG
USCG PolRep Distribution, USCG
FEMA Polrep, FEMA

From: Tricia A. Edwards, OSC
Date: 4/14/2011
Reporting Period: 4/2/11 - 4/15/11

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 activities.

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 continued to clean the remaining vats to remove the solids at the bottom. The use of a high-pressure, hot water unit was utilized to break up the material. The solids were containerized for disposal. Once all solids were removed, each of the vats was triple rinsed. All liquids from the power washing was collected and will be shipped for disposal. The vats are constructed of poly, steel, or stainless steel. Based on the type of material, the vats are being rendered useless (cut up or damaged) and then segregated for recycle.

To allow for access to the vats, much of the floor in the plating room has to be removed. The floor is comprised of wood and steel grating. The flooring material is containerized for disposal as it is removed.

The vats were set in open concrete barriers (walls and floor), approximately 3' beneath the the flooring. The barriers allowed for separation between the different plating lines (ie. separated acids from cyanides). Once the vat was removed, ERRS shoveled out the solids that had accumulated in the bottom of the concrete barriers. The solids removed from beneath the vats were containerized separately according to the section from which it was removed. Approximately 1/3 of the plating room floor has been removed.

ERRS has completed the necessary paperwork (i.e profiles) for disposal for EPA approved CERCLA facilities for disposal. Most waste streams have been approved for disposal.

8,500gallons of non-hazardous liquids were shipped to Autumn Hills-Zeeland for disposal on Tuesday, April 12.

On Friday, April 15 a van load of drums and totes was shipped to EQ-Detroit for disposal. The waste streams are provided on the table below.

ERRS completed amendments for the Health and Safety Plan. Amendments were completed for Hot Work, Confined Space Entry, and the the upcoming GeoProbe and MIP activities. EPA and START reviewed and commented on the amendments. The necessary changes were implemented into the amendments and then incorporated into the existing HASP.

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

Waste Stream	Medium	Quantity	Manifest #	Disposal, Location
Non-Haz Profile #108663MI	Solid	20 CY	T06940	Autumn Hills Landfill 700 56 th Avenue Zeeland, MI 49464
Non-Haz Profile #108663MI	Solid	20 CY	T06945	Autumn Hills Landfill 700 56 th Avenue Zeeland, MI 49464

Non-Haz Profile #108737MI	Liquid	8,500 GAL	008198704JJK	Autumn Hills Landfill 700 56 th Avenue Zeeland, MI 49464
Non-Haz Profile #108663MI	Solid	20 CY	T06947	Autumn Hills Landfill 700 56 th Avenue Zeeland, MI 49464
Non-Haz Non-Regulated Material	Liquid	55 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
Non-Haz Non-Regulated Material	Solid	3,500 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN2672 Waste Ammonia Solutions, ERG#154	Liquid	55 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN2014, Waste Hydrogen Peroxide, ERG#140	Liquid	55 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1759, Waste Corrosive Solids, ERG#154	Solid	1,400 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1759, Corrosive Solid, ERG#154	Solid	300 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1498, Waste Sodium Nitrate, ERG#140	Solid	400 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1263, Waste Paint related material, ERG#128	Solid	2,000 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1463, Waste Chromium Trioxide, ERG#141	Solid	300 LB	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1760, Waste Corrosive Liquids, ERG#154	Liquid	85 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1760, Waste Corrosive Liquids, ERG#154	Liquid	330 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1993, Waste	Liquid	275 GAL	008268155JJK	EQ Detroit

Flammable Liquid, ERG#128				1923 Frederick, Detroit, MI 48211
UN1935, Waste Cyanide Solution, ERG#157	Liquid	1,980 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN1755, Waste Chromic Acid Solution, ERG#154	Liquid	990 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211
UN2789, Waste Acetic Acid, glacial, ERG#132	Liquid	200 GAL	008268155JJK	EQ Detroit 1923 Frederick, Detroit, MI 48211

2.2 Planning Section

2.2.1 Anticipated Activities

- Removal of solids from vats
- Removal of vats from the plating room
- Removal of solids below the vats
- Containerization of vats for metal recycling
- Coordination of transportation of waste
- Preparation of sub-surface investigation

2.2.1.1 Planned Response Activities

The focus over the next few weeks will be to coordinate disposal.

ERRS will continue 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

U.S. EPA has requested the MDEQ and their contractor, DLZ provide feedback regarding the upcoming GeoProbe and MIP work. GeoProbe and MIP is scheduled to begin the week of May 9.

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	\$500,000.00	\$305,937.00	\$194,063.00	38.81%
TAT/START	\$90,916.00	\$67,109.00	\$23,807.00	26.19%
Intramural Costs				

USEPA - Direct	\$0.00	\$21,735.00	(\$21,735.00)	0.00%
USEPA - InDirect	\$0.00	\$43,470.00	(\$43,470.00)	0.00%
Total Site Costs	\$590,916.00	\$438,251.00	\$152,665.00	25.84%

* 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.