

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #6  
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:** 5/2/2011  
**Reporting Period:** 4/16/11 - 4/30/11

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	B5WV	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	2/7/2011	<b>Start Date:</b>	2/7/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**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 removed all of the vats from the plating room, removed 3/4 of the flooring, and continued to remove the solids that had accumulated below the vats in the bottom of the concrete barriers. The flooring material is containerized for disposal as it is removed. The solids removed from beneath the vats are also containerized into cubic yard boxes separately according to the section from which it was removed. The use of a high-pressure, hot water unit was utilized to triple rinse the vats. 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.

Samples of the waste collected from beneath the vats were sent for analysis. Analytical results are expected on May 6. ERRS will complete the necessary paperwork (i.e profiles) for disposal for EPA approved CERCLA facilities for disposal of the new waste streams.

**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 <sup>th</sup> Avenue Zeeland, MI 49464
Non-Haz Profile #108663MI	Solid	20 CY	T06945	Autumn Hills Landfill 700 56 <sup>th</sup> Avenue Zeeland, MI 49464
Non-Haz Profile #108737MI	Liquid	8,500 GAL	008198704JJK	Autumn Hills Landfill 700 56 <sup>th</sup> Avenue Zeeland, MI 49464
Non-Haz Profile #108663MI	Solid	20 CY	T06947	Autumn Hills Landfill 700 56 <sup>th</sup> 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 Flammable Liquid, ERG#128	Liquid	275 GAL	008268155JJK	EQ Detroit 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
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## 2.2 Planning Section

### 2.2.1 Anticipated Activities

- Begin removal of waste and equipment in the waste water treatment room
- Containerization of vats for metal recycling
- Coordination of transportation of waste
- Conduct sub-surface Membrane Interface Probe investigation
- Investigate storm sewers

#### 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 the water treatment room. 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
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$500,000.00	\$379,584.00	\$120,416.00	24.08%
TAT/START	\$130,150.00	\$76,045.00	\$54,105.00	41.57%
<b>Intramural Costs</b>				
USEPA - Direct	\$0.00	\$25,695.00	(\$25,695.00)	0.00%
USEPA - InDirect	\$0.00	\$51,390.00	(\$51,390.00)	0.00%
<b>Total Site Costs</b>				
	\$630,150.00	\$532,714.00	\$97,436.00	15.46%

\* 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**

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 #6 Last Updated 5/16/2011