

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** **POLREP #7**  
**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:** 5/18/2011  
**Reporting Period:** 5/1/11 - 5/17/11

**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 completed the removal of the solids below the vats and the flooring. These items were separated according by sections that were removed then containerized in cubic yard boxes for removal. ERRS began work along the water treatment line removing the piping and filter press.

During the week of May 9, the Membrane Interface Probe/Geoprobe subsurface investigation was completed. An additional START was mobilized to the site to conduct oversight of the subsurface investigation. The MIP investigation was conducted at 26 locations throughout the site. Of those 26 locations, 20 samples were collected based on the MIP results. These samples will be analyzed for VOC's, SVOC's, TAL Metals, and total Cyanide.

On May 17, START also collected a total of 8 water samples and 6 sediment samples from the stormwater sewers located around the plating facility. These samples will be analyzed for VOC's and TAL Metals. In addition, 2 wall samples were collected from the plating room to be analyzed for TAL Metals and total Cyanide.

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<br>(CY, LB,<br>GAL) | Manifest Number | Disposal Facility, Location   |
|------------------------------|--------|------------------------------|-----------------|---|
| Non-Haz<br>Profile #108663MI | Solid  | 20 CY                        | T06940          | Autumn Hills Landfill<br>700 56 <sup>th</sup> Avenue<br>Zeeland, MI 49464 |
| Non-Haz<br>Profile #108663MI | Solid  | 20 CY                        | T06945          | Autumn Hills Landfill<br>700 56 <sup>th</sup> Avenue<br>Zeeland, MI 49464 |
| Non-Haz                      | Liquid | 8,500 GAL                    | 008198704JJK    | Autumn Hills Landfill   |

|   |        |          |              |   |
|---|--------|----------|--------------|---|
| Profile #108737MI   |        |          |              | 700 56 <sup>th</sup> Avenue<br>Zeeland, MI 49464                          |
| Non-Haz<br>Profile #108663MI                                      | Solid  | 20 CY    | T06947       | Autumn Hills Landfill<br>700 56 <sup>th</sup> Avenue<br>Zeeland, MI 49464 |
| Non-Haz<br>Non-Regulated Material                                 | Liquid | 55 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick<br>Detroit, MI 48211                         |
| Non-Haz<br>Non-Regulated Material                                 | Solid  | 3,500 LB | 008268155JJK | EQ Detroit<br>1923 Frederick<br>Detroit, MI 48211                         |
| Non-Haz<br>RCRA empty containers &<br>debris<br>Profile #108663MI | Solid  | 20 CY    | T06948       | Autumn Hills Landfill<br>700 56 <sup>th</sup> Avenue<br>Zeeland, MI 49464 |
| UN2672 Waste Ammonia<br>Solutions, ERG#154                        | Liquid | 55 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN2014, Waste Hydrogen<br>Peroxide, ERG#140                       | Liquid | 55 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1759, Waste Corrosive<br>Solids, ERG#154                        | Solid  | 1,400 LB | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1759, Corrosive Solid,<br>ERG#154                               | Solid  | 300 LB   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1498, Waste Sodium<br>Nitrate, ERG#140                          | Solid  | 400 LB   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1263, Waste Paint<br>related material, ERG#128                  | Solid  | 2,000 LB | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1463, Waste Chromium<br>Trioxide, ERG#141                       | Solid  | 300 LB   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211                        |
| UN1760, Waste Corrosive   | Liquid | 85 GAL   | 008268155JJK | EQ Detroit  |

|  |        |           |              |  |
|--|--------|-----------|--------------|--|
| Liquids, ERG#154   |        |           |              | 1923 Frederick, Detroit, MI<br>48211               |
| UN1760, Waste Corrosive Liquids, ERG#154                   | Liquid | 330 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN1993, Waste Flammable Liquid, ERG#128                    | Liquid | 275 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN1935, Waste Cyanide Solution, ERG#157                    | Liquid | 1,980 GAL | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN1755, Waste Chromic Acid Solution, ERG#154               | Liquid | 990 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN2789, Waste Acetic Acid, glacial, ERG#132                | Liquid | 200 GAL   | 008268155JJK | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN2031, Waste Nitric Acid, 8, PGII<br>Approval #D114200DET | Liquid | 3,300 GAL | 004761461FLE | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| UN2031, Waste Nitric Acid, 8, PGII<br>Approval #D114200DET | Liquid | 125 GAL   | 004761461FLE | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |
| Non-DOT/Non-RCRA Regulated<br>Approval #D114200DET         | Liquid | 300 GAL   | 004761461FLE | EQ Detroit<br>1923 Frederick, Detroit, MI<br>48211 |

## 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

#### 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**

Awaiting analytical results from the MIP/Geoprobe subsurface investigation and the storm sewer investigation.

**2.2.2 Issues**

**2.3 Logistics Section**

No information available at this time.

**2.4 Finance Section**

**Estimated Costs \***

|                           | <b>Budgeted</b> | <b>Total To Date</b> | <b>Remaining</b> | <b>% Remaining</b> |
|---------------------------|-----------------|----------------------|------------------|--------------------|
| <b>Extramural Costs</b>   |                 |                      |                  |                    |
| ERRS - Cleanup Contractor | \$900,000.00    | \$498,312.00         | \$401,688.00     | 44.63%             |
| TAT/START                 | \$130,150.00    | \$98,190.00          | \$31,960.00      | 24.56%             |
| <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>   |                 |                      |                  |                    |
|                           | \$1,030,150.00  | \$673,587.00         | \$356,563.00     | 34.61%             |

\* 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.