

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, August 13, 2004

From: Art Smith

Subject: Initiation of Action
Universal Plating
135 Industrial Road, Morganfield, KY

POLREP No.:	2	Site #:	A4FM
Reporting Period:	June 10 to August 13	D.O. #:	0204-F4-026
Start Date:	6/9/2004	Response Authority:	CERCLA
Mob Date:	6/10/2004	Response Type:	
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	A4FM	Contract #	68-S4-0204
RCRIS ID #:			

Site Description

The site is the location of the former Universal Plating operation. It was in business from the late 1990s until October 2002 and was involved in custom electroplating and powder coating operations. On April 14, 2004, the Kentucky Department for Environmental Protection (KYDEP) Division of Waste Management, Madisonville Regional Office (R.O.) staff conducted an initial investigation of the facility. The building was found to be locked and unoccupied. Subsequent inquiries by KYDEP disclosed that the owner had filed for bankruptcy, and that creditors who had filed actions against the owner of the business were concerned about the possibility of hazardous conditions at the facility. After obtaining permission to access the building, KYDEP Madisonville R.O. staff conducted an inspection of the facility on April 29, 2004. The inspection report noted the presence of numerous tanks and other open containers of suspected plating solutions and a "significant acrid/sulfuric acid" odor emanating from a building opening. Following the inspection, KYDEP Madisonville R.O. referred the matter to the KYDEP Superfund Branch for further action. On June 8, 2004, the OSC and the Region 4 Superfund Technical Assessment and Response Team (START) accompanied KYDEP Superfund Branch personnel and conducted a removal site evaluation (RSE) pursuant to Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The OSC noted that the site was abandoned and detected the odor of acid fumes in areas outside the plating building. Once inside, the investigation team documented the presence of suspected plating solutions in over 20 open tanks inside the building. Two of the tanks were labeled "muriatic acid", and had a measured pH of less than 2. Muriatic acid is a synonym for hydrochloric acid, a listed hazardous substance. Vapor concentrations above one of the tanks exceeded 6 parts per million (ppm) on a mineral acid cartridge, as measured by a Single Point Monitor (SPM) direct reading instrument. Based on the previous detection of odors by the OSC in areas outside of the building, the SPM was re-deployed and readings from within the fan housing exiting the building ranged from 0.3-0.5 ppm, verifying that an airborne release into the environment is ongoing. Further investigation was halted at this point due to safety concerns, and the RSE was concluded by the OSC. KYDEP and the START contractor (Tetra Tech EMI, Inc.) demobilized the Site on June 8, 2004. On June 9, 2004, the OSC issued a verbal Task Order to the Emergency and Rapid Response Services (ERRS) contractor (CMC, Inc.) for purposes of stabilizing immediate hazards at the Site. On June 10, 2004, work was performed to cover all open containers and to secure the building. All parties demobilized the Site on June 10.

Current Activities

After issuing CERCLA Notice to the property owner and obtaining formal access, EPA and its contractors re-mobilized to the site on July 26, 2004 to complete the initial phase of the removal action. Activities included hazard characterization for wastestream identification of plating baths and other miscellaneous chemicals found throughout the building. Field compatibility testing was performed and test bulking schemes were prepared. The primary wastestream is over 13,000 gallons of an acid liquid with a pH of less than 1.0 units. A cyanide liquid wastestream of up to 1,000 gallons appears to be amenable to oxidation, if on-site treatment is cost-effective. Also, up to 4 tons of a caustic solid wastestream (pH 12) will require disposal at an off-site facility. After samples of liquid, solids, and soils were sent to an offsite lab for analyses, all parties demobilized the Site on July 28.

Planned Removal Actions

The cleanup contractor, CMC, Inc. is currently reviewing analytical results and preparing disposal profiles. Re-mobilization to the site is tentatively scheduled for the week of Aug. 16 to conduct Phase 2 removal activities, which include final treatment/disposal of plating wastes and building decon. The goal of the removal action is to decon the building to an extent which would allow for commercial reuse of the property. EPA anticipates completing the removal action in September 2004.

response.epa.gov/universalplating