United States Environmental Protection Agency
Region IX
POLLUTION REPORT

Date: Monday, March 7, 2005
From: Craig Benson

Subject: Initiation of Action
Palomar Plating Co.
722 W. Fourth Ave., Escondido, CA
Latitude: 33.1147000
Longitude: -117.0883000

POLREP No.:	1	**Site #:**	09MT
Reporting Period:	2/16/2005 - 3/3/2005	**D.O. #:**	
Start Date:	2/16/2005	**Response Authority:**	CERCLA
Mob Date:	2/16/2005	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	CAD981388101	**Contract #**	
RCRIS ID #:			

Site Description

The Palomar Plating Co. (Palomar), is located at 722 West 4th Avenue in the City of Escondido, County of San Diego, California. Until eviction in late 2004, Palomar finished metal parts for the aerospace industry and other customers. The surrounding area is comprised of commercial and industrial facilities, with the exception of two residences located immediately adjacent to the southeast border of the site. The approximate one acre site includes four main buildings (total of 17,842 ft2) which were used as office space, numerous plating lines, equipment and chemical storage, maintenance and paint departments, and warehousing of finished product.

Palomar has been the subject of numerous State and County investigations and corrective action orders involving groundwater and soils contamination and improper hazardous waste management. After eviction by the property owner, the concerns of local agencies precipitated a multi-agency (EPA, State, County) inspection of the abandoned facility on February 16, 2005. The EPA OSC witnessed a large quantity of liquid and solid hazardous wastestreams including, nitric, sulfuric and chromic acid solutions, cyanides, hexavalent chromium, sodium hydroxide, and several metal salt solutions in unsecured plating vats, product and waste containers and waste treatment process vessels throughout the property.

Formal EPA involvement with Palomar began on February 16, 2005 with the issuance of a general notice of CERCLA liability to the property owner and oversight of property owner funded immediate stabilization activities. These activities are expected to transition to a PRP funded full-scale site cleanup operation under the terms of a CERCLA 106 Order.

Current Activities

2/16/05

OSC R. Wise participated in a multi agency inspection of Palomar Plating at the request of the San Diego County Hazardous Materials Division (SDHMD). Site conditions prompted OSC Wise to give a general notice of CERCLA liability to the property owner, Todd Harding. The immediate stabilization actions required in the Notice were communicated to Mr. Harding through his attorney. Mr. Harding contracted with Environmental Recovery Services, Inc. (Enviroserv) that same evening. The immediate stabilization requirements included providing for containment, evaluation and removal of all run-off and free-standing liquids on-site and covering all exterior chemical storage pads. OSC Wise requested a work plan addressing the complete removal of containerized materials by February 28, 2005.

2/17/05 - 2/21/05

Site stabilization activities including securing wastes on-site and providing for storm water runoff collection and analysis continue with Enviroserv under contract to Mr. Harding. An inventory listing field identification and hazard categorization test results for over 800 hazardous substance containers associated with plating, anodizing, laboratory, wastewater treatment operations is prepared by Enviroserv to assist with overall workplan development. Identified materials include nitric, sulfuric and chromic acid solutions, cyanides, hexavalent chromium, sodium hydroxide, and several metal salt solutions.

2/22/05
OSC C. Benson, OSC R. Martyn, START and EPA Civil Investigator J. Jaros met with Enviroserv, City of Escondido Public Works Department (EPWD) and SDHMD personnel on-site. The EPA group evaluated the progress of site stabilization, inventorying and sampling efforts. EPWD agreed to evaluate accumulated storm water and work directly with Enviroserv on the requirements and approvals for discharge to the sanitary sewer.

Upon learning of significant Regional Water Quality Control Board (RWQCB), San Diego Region involvement with the site, OSC Benson contacted RWQCB representative P. Peuron and learned of long-standing groundwater and soil contamination issues on-site. Numerous groundwater monitoring and extraction wells and a soil vapor extraction system were installed at Palomar in response to a RWQCB Cleanup and Abatement Order issued in 2000. The abatement processes were operated for a short period until funding was reportedly exhausted.

Based on available data and knowledge of the locations of contamination sources, the RWQCB can aide EPA and the PRPs with the design of a sampling plan to address shallow soil contamination (3-5 feet below ground surface (bgs) beneath and adjacent to plating and treatment areas.

In telephonic communications with Mr. Harding and his attorney, Mr. Harding reiterated to OSC Benson and Investigator Jaros that he will attempt to fund the full chemical removal action that will be performed under the terms of an EPA approved workplan (in-progress).

2/23/05
Requirements for the complete chemical removal action workplan were communicated to Enviroserv (acting on behalf of Mr. Harding) in a meeting conducted by OSC Benson at the EPA Signal Hill location. The original February 28, 2005 workplan deadline specified by the general notice of CERCLA liability compliance schedule was confirmed as the submittal deadline for review by OSC Benson.

2/28/05
The cleanup workplan was submitted by Enviroserv and reviewed and approved by OSC Benson. Enviroserv reported that Mr. Harding had provided the necessary funding to accomplish the full scope of the cleanup. The following day, March 1, 2005, was set as the beginning of workplan implementation and the transition day from emergency stabilization activities to full-scale site cleanup actions.

3/1/05
OSC Benson and START on-site. Daily and weekly reporting procedures were established between EPA/START and Enviroserv. Key activities include lab-packing, work and support zone set-up, and decontamination line set-up.

Investigator Jaros met with Palomar business owner, Frank Cedillos at the Carlsbad, CA offices of his attorney to report on the current EPA activities, assess his responsibility at Palomar and determine his financial ability to provide funds for future clean up work. Mr. Cedillos reported to not have the financial viability to financially participate in the removal action. OSC Benson provided more specific site operations information to the attorney in a follow-up phone call and discussed a need for Mr. Cedillos presence on-site a least one day in the near future to answer questions specific to the former processes on-site for the benefit of the cleanup process.

3/2/05
No EPA/START on-site. Key activities include lab-packing, review of incoming laboratory analytical data, consolidation of compatible caustic wastes, manifest and transport 5 cubic yards of filter cake (F006), and devising a process of empty and/or segregation for the RCRA hazardous waste wastestream.

3/3/05
OSC Benson and START on-site. Vacuum truck operations to pump approximately 2,000 gallons of consolidated cyanide bearing wastestreams. The bulk of the material was cadmium cyanide solution located in vats in the cadmium and zinc plating line at the southern end of the plating building ("Building 4"). The balance consisted of miscellaneous cyanide solutions found in several cubic yard totes across the site, solution in the outdoor cyanide destruct fixed treatment unit, and miscellaneous small quantities of cyanide bearing solution found in the laboratory.

Next Steps
- Action Memorandum approval and issuance of CERCLA 106 Order to PRPs.
- Continue profiling, re-containerization and removal of all above ground waststreams.

• Attempt to schedule a site visit with the Mr. Cedillos, OSC Benson and the Enviroserv cleanup team to gain further insights into certain process equipment, wastestreams, drainage sumps and the liquid transfer line network on-site.
• Walkthrough with Mr. Cedillos and/or Mr. Harding to identify, mark and segregate any salvageable items.
• Continued coordination with EPWD for accumulated storm water discharge approval and conditions.

Key Issues

• The RWQCB will continue to oversee the chronic deep soil and groundwater response as it determines is necessary. The RWQCB can aide EPA and the PRPs with the design of a sampling plan to address shallow soil contamination (3-5 feet below ground surface (bgs) beneath and adjacent to plating and treatment areas.
• No media interest
• A record of project wastestreams, shipment dates and receiving facilities is provided in the documents link at www.epaosc.net/palomar.

response.epa.gov/palomar