

**United States Environmental Protection Agency  
Region IX  
POLLUTION REPORT**

**Date:** Tuesday, March 22, 2005

**From:** Craig Benson

**To:** Francisco Arcaute, USEPA  
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Steven John, USEPA  
Edward Slater, SDHMD  
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**Subject:** Continuation of Action  
Palomar Plating Co.  
722 W. Fourth Ave., Escondido, CA  
Latitude: 33.1147000  
Longitude: -117.0883000

|                          |                   |                            |                |
|--------------------------|-------------------|----------------------------|----------------|
| <b>POLREP No.:</b>       | 3                 | <b>Site #:</b>             | 09MT           |
| <b>Reporting Period:</b> | 3/12/05 - 3/17/05 | <b>D.O. #:</b>             |                |
| <b>Start Date:</b>       | 2/16/2005         | <b>Response Authority:</b> | CERCLA         |
| <b>Mob Date:</b>         | 2/16/2005         | <b>Response Type:</b>      | Time-Critical  |
| <b>Demob Date:</b>       |                   | <b>NPL Status:</b>         | Non NPL        |
| <b>Completion Date:</b>  |                   | <b>Incident Category:</b>  | Removal Action |
| <b>CERCLIS ID #:</b>     | CAD981388101      | <b>Contract #</b>          |                |
| <b>RCRIS ID #:</b>       |                   |                            |                |

**Site Description**

See POLREP No. 1

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. PRP funded activities continue under the terms of a CERCLA 106 Order.

**Current Activities**

POLREP No. 1 documents site activities from 2/16/05 - 3/3/05.

POLREP No. 2 documents site activities from 3/4/05 - 3/11/05.

Enviroserv (under contract to the property owner) completed the first phase waste removal activities on 3/16/05.

3/12/05 - 3/13/05:

No activity.

3/14/05:

OSC Benson and START on-site. EPA Criminal Investigation Division (CID) Agents M. Burnett and L. Cagle met on-site with OSC Benson. The site visit was incidental to work the Agents were conducting in the area. Enviroserv continued to remove catwalks, wood, vats, piping and concrete from the southern and central process areas of Building 4. Field tests were utilized to confirm residual cyanide destruction in associated piping and vats. Lab pack drum preparation and shipment continued, including the packing of limited quantities of thorium nitrate (low level radioactive waste) discovered in the on-site lab. Thorium nitrate is used for hydrofluoric acid analysis in titanium etch processes.

The City of Escondido Public Works Department (EPWD) authorized the release of the 24,000 gallons of stormwater captured and contained in Baker tanks during the emergency stabilization phase of the

project. There were no time restrictions, but carbon treatment and a 25 gpm maximum flow rate to the approved manway were required. Enviroserv began the treatment and discharge at 1400 hours.

An asbestos abatement contractor was brought on-site and confirmed the absence of asbestos containing materials in wrapped piping and materials being removed from Building 4. All PVC, fiberboard and poly tanks and vats continued to be cut-up and managed as RCRA waste. Metal tanks and vats found in good condition with potential residual value (stainless steel) are decontaminated and staged in a designated area on-site. These items may be offered by the property owner to new end-users or for sale as scrap.

3/15/05:

START on-site. Enviroserv completed the removal of solid wastes from Building 4 and completed the EPWD approved stormwater discharge. The crew consolidates all remaining general debris wastestreams and prepares all remaining/re-containerized wastestreams for shipment.

The START implemented an OSC approved Quality Assurance Sampling Plan (QASP) for shallow subsurface soil sample collection. The main objective of this event was to obtain an analytical data set meeting U.S. EPA Quality System guidelines that is representative of current conditions and that could be used to assist with better defining the constituents of interest for the Phase II subsurface and building material contaminant evaluation. Seven shallow soils from underneath the Building 4 foundation and the exposed soils area in the northeast portion of the site and one building material composite sample were collected for analysis of total metals, cyanide and pH. The total metals data will be used to evaluate the need for a potential second tier analysis for the hazardous waste determining Toxicity Characteristic Leaching Procedure and/or analysis of archived depth samples. All preliminary EPA data will be provided to the property owner and his consultants for their use in preparing the Phase II sampling plan.

3/16/05:

OSC Benson and START on-site. Enviroserv pumped the wastewater treatment system clarifiers, cleaned and demobilized all Baker tanks, pressure washed and swept all concrete/asphalt surfaces and completed general site cleanup. OSC Benson conducted a job walk with the Enviroserv Response Manager and approved the completion of Phase I removal activities.

All remaining hazardous wastes were transported off-site. The final Phase I hazardous waste shipment involved the thorium nitrate lab packs which were prepared for shipment by the radiation specialty company Thomas Gray and Associates.

3/17/05:

OSC Benson organized and led a site walk/meeting with the following group:

- R. Opper, attorney for property owner
- D. Johnson, SCS Engineers representing property owner
- P. Peuron, RWQCB-San Diego Region
- M. Calhoun, Escondido Fire Department
- START

All completed Phase I activities were summarized and the expectations for Phase II operations were communicated by OSC Benson. SCS Engineers was encouraged to access the historic RWQCB reports and data summaries. In addition, OSC Benson arranged to have any draft START reports, preliminary EPA analytical data summaries and EPA Sampling and Analysis Plan templates delivered to SCS Engineers to assist in Phase II sampling plan development.

Notwithstanding any requests for extension, the submittal deadline for the Phase II sampling plan was set for March 25, 2005.

### **Planned Removal Actions**

All Phase I removal activities have been completed. The project is currently in the Phase II planning stage.

### **Next Steps**

- Receipt of all EPA preliminary data from the 3/15 sampling event. This summary (unvalidated) data will be furnished to the PRP representatives upon receipt.
- Delivery of a draft Phase II sampling plan by the 3/25/05 deadline.
- Receipt of Phase I (Enviroserv) reports.
- Approve end-user for decontaminated equipment and/or remove for scrap value.

### **Key Issues**

- All Phase I activities were in compliance with EPA procedures for planning and implementing off-Site Response Actions established at 40 C.F.R. § 300.440.
- 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.

**Estimated Costs \***

|                         | <b>Budgeted</b> | <b>Total To Date</b> | <b>Remaining</b> | <b>% Remaining</b> |
|-------------------------|-----------------|----------------------|------------------|--------------------|
| <b>Extramural Costs</b> |                 |                      |                  |                    |
| <b>Intramural Costs</b> |                 |                      |                  |                    |
| <b>Total Site Costs</b> | \$0.00          | \$0.00               | \$0.00           | 0.00%              |

\* 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.

**Disposition of Wastes**

A detailed record of project wastestreams, shipment dates and receiving facilities is provided in the documents link at [www.epaosc.net/palomar](http://www.epaosc.net/palomar).

Summary of wastes removed in Phase I:

Approximately 20,600 gallons of waste acidic liquids, 900 pounds of acidic solids, 1,100 gallons of waste basic liquids, 75 pounds of basic solids, 15 pounds of radioactive material, 200 pounds of toxic solids, 75 gallons of non-RCRA waste petroleum liquids, 2,700 gallons of waste cyanide liquids, 600 pounds of cyanide solids, 4,000 gallons of aqueous chromium solutions, 190 gallons of flammable liquids, 500 pounds of flammable solids, 100 gallons of oxidizing liquids, 650 pounds of oxidizing solids, 30 gallons of toxic liquids, 500 pounds of environmentally-hazardous solids, 400 pounds of non-RCRA hazardous wastes, 5,800 gallons of hazardous waste liquids, 14,000 gallons of hazardous waste (chromium-tainted) stormwater, 3,000 pounds of filter cake solids, and 160 cubic yards of hazardous debris.

[response.epa.gov/palomar](http://response.epa.gov/palomar)

POLREP #3 Last Updated 3/22/2005