United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Tuesday, May 20, 2003
From: Marc Callaghan

To:

Chris Field, USEPA	Terry Eby, USEPA
Mary Matthews, USEPA	Jeff Fowlow, Ecology & Environment
Phyllis Corrasco, USEPR R7	Mike Sibley, USEPA
Jerry Wade, Environmental Quality Management	Mike Szerlog, USEPA
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Andree Pollock, ODEQ	Ron McManamy, Environmental Quality Management
Dan Opalski, USEPA	Anne Price, ODEQ
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Subject: Initiation of Action
Columbia American Plating Company
3003 NW 35th Avenue, Portland, OR
Latitude: 45.5442000
Longitude: -122.7189000

POLREP No.:	1	**Site #:**	10BD
Reporting Period:	5/9-19/03	**D.O. #:**	
Start Date:	5/13/2003	**Response Authority:**	CERCLA
Mob Date:	5/15/2003	**Response Type:**	Emergency
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	ORD068788926	**Contract #**	TDD#0305004
RCRIS ID #:	ORD068788926		

Site Description

Columbia American Plating Co. is located at 3003 NW 35th Avenue in the Guilds Lake industrial area of Portland, Oregon.

Columbia American Plating Co. is a registered large-quantity hazardous waste generator, shipping waste under EPA identification number ORD 068788926. CACP operated under Air Contaminant Discharge Permit #26-2809 and wastewater discharge permit #413-005. CACP is located in a primarily industrial area with the following neighbors: Carson Oil to the north; Meyers Drum Company is to the West, Rose City Van Storage and Commercial Furnishing, Inc. are across NW 35th Avenue to the east and Northwestern Steel Company is located across NW Lake Street to the South. The nearest residences are approximately 0.5 miles to the south along St. Helens Road. The Willamette River is approximately 0.75 mile northeast of the facility.

CAPC is a medium sized commercial metal plating facility that performs several kinds or electroplating. Historically the site has been used for plating operations with zinc, nickel, copper, chromium, silver, gold, tin, and cadmium. Although processes varied from one metal to another, their general process involved pre-cleaning with caustic solution or solvent, acid pickling (which eliminated scales remaining after cleaning), metal plating, and often a final chromate dip to protect plated surfaces. Zinc plating is currently the primary process at the site. The facility employed approximately 13 people.

A variety of hazardous materials have been used and stored at the facility including acids, bases, dissolved metal solutions, solvents, oxidizers, and cyanides. A wastewater treatment unit (WWTU), to treat both rinse waters from the actual plating process as well as surficial water accumulation outside the facility. The WWTU has four main functions including chemical precipitation, filtration, chromium reduction, and pH adjustment. The WWTU generates a sludge that is a F006 hazardous waste. The wastewater, after pretreatment, is discharged pursuant to an industrial waste pretreatment permit issued by the City of Portland (City of Portland Industrial Discharge Permit 413.005).

Concentrated solutions (plating baths, pickling acids, stripping baths, alkaline cleaners, etc.) are stored in containers along the north fence and batched into the WWTU. Flocculation, settling, and a filter press remove solids in the WWTU. The sludge from the wastewater treatment unit is first dried using heat from the boiler and then dried in an oven to reduce the water content. This sludge is a F006 hazardous waste. Sludge from the wastewater treatment system is being stored on site along with various other liquid and solid wastes.

The site consists of RCRA D, F, and P listed wastes (D001, D002, D003, D006, F006, F007, P030), is in disrepair, has poor housekeeping, and is accumulating on site run off that needs to be managed. Several hundred drums and miscellaneous containers are scattered throughout the site.

On May 9, 2003 the City of Portland's Fire Marshals Office (FMO) closed the Columbia American Plating Co. stating that the premises was "imminently dangerous and unsafe for the purpose for which they are being used and are a fire hazard as defined in Portland City Code" Title 31 Fire Regulations, Section 31.20.050. The FMO ordered all work to cease and evacuation of the building. On this same day (5/9/03) the City of Portland's Bureau of Environmental Services terminated sewer system services to Columbia American Plating Co. based on "an imminent danger to the health and welfare of persons or the environment", pursuant to City Code 17.34.110(D)(2)(b).

On Thursday May 15, 2003 DEQ's Emergency Response and Removal Program contacted and requested EPA's Emergency Cleanup Unit for assistance in evaluating and mitigating the imminent threat to human health and the environment posed by the Columbia American Plating Co. EPA was asked to stabilize the site and initiate a removal action if the determination was made that: 1) the site presented an immediate risk to public health or welfare or the environment; and 2) determine if the responsible party was going to act in a timely manner to the actual and threatened releases of hazardous substances from the site.

EPA is responding to the site at the request of the DEQ. Initial activities were directed at securing and stabilizing the site through the management and control of on site water accumulation, the covering of open containers exposed to the environment and determining the secondary hazards that exist on site. Further assessment of site conditions and hazard categorization for unknowns has also occurred.

The primary concern at this Site was the threat of fire and explosion. The secondary concern is the threat posed by CERCLA hazardous substances and pollutant or contaminants releasing from abandoned drums, Above Ground Storage Tanks (AST's) and process area vats. Drums and containers onsite will continue to deteriorate over time. As a result, the potential of solvents, acids, bases, oil, and toxic chemicals to be released to the environment is high.

Current Activities

Friday May 9, 2003:
In a letter dated today the Portland Fire Marshals Office (FMO) closed the Columbia American Plating Co. stating that the premises was "imminently dangerous and...unsafe for the purpose for which they are being used and are a fire hazard as defined in Portland City Code." The FMO ordered all work to stop and evacuation of the building.

On this same day and based on past violations the City of Portland Water Services Department closed all on site storm water and sewer systems to keep all potential contamination from migrating off site.

Thrusday May 15, 2003:
In an email dated today DEQ's Emergency Response and Removal Program contacted and requested EPA's assistance in evaluating and mitigating the imminent threat to human health and the environment posed by the Columbia American Plating Co and the chemicals stored there.

EPA OSC Marc Callaghan, EPA RCRA inspector Bruce Long, and ODEQ's Hazardous Waste Compliance Officer Rebecca Christiansen arrived on site at the Columbia American Plating Co facility to conduct a site reconnaissance and removal assessment with the RP, his attorney and clean up contractor PSC. Fire service and Portland City Water Works personnel were in attendance too. The purpose of the

The removal assessment conducted by EPA and DEQ concluded that the site now abandoned has significant hazardous materials left precariously on site and needs to be stabilized as soon as possible to mitigate fire and explosion hazards and to prevent rainfall from carrying hazardous chemicals off-site with surface water runoff. EPA further concluded that a removal action was consistent with 40 C.F.R. part 300 of the NCP that immediate stabilization should begin with followup removal actions by the RP or the USEPA if necessary.

EPA requested that the RP in consultation with his attorney provide two items by 4:00 pm: a letter indicating that the RP had acquired a competent contractor to conduct the necessary stabilization and removal actions at the site, and either grant or deny the EPA and their representatives written access to the site by signing a proper EPA issued access agreement.

EPA was granted access and informed by the RP's attorney that he was not able to enter into an agreement with an environmental cleanup contractor to conduct the necessary stabilization actions.

Friday May 16, 2003:
Marc Callaghan (EPA OSC) mobilized to the site with EPA contractors at 10am to initiate stabilization. (6)START, and (2) EQM, personnel on site. FMO on site to turn over keys to the facitlity. Stabilization activities included pumping surficial water into an onsite AST, covering containers; vats and drums, that were open to and effected by the percipitation with visquene, disconnecting all electrical and gas service to prevent ignition sources and electrical hazards, and establishing 24 hour security service.

Saturday May 17, 2003
START (6), EQM (4), and EPA OSC on site. Continued monitoring and conducting on site water control. Cleared debris and staged drums on the South side of the building for haz catting and sampling events.

START members made 2 entries into the building using level B protection. The first entry allowed for the monitoring of internal air conditions inside the building as well as the sampling of 6 large fiberglass tanks that are a part of the on site Waste Water Treatment Unit (WWTU). Air monitoring equipment indicated no detectable organic vapors, did not exceed the LEL and indicated good Oxygen levels. A radiation device detected levels above background and caused the entry team to back out and renter a second time to complete a recon of the basement area. The second entry was done using a SAM radiation monitor and did not detect radiation levels of concern. Results of the entry will allow for level C protection with splash guard while working indoors.

Sunday May 18, 2003
START (6), EQM (4), and EPA OSC on site. START members made 2 seperate entries into the building. Both entries were made in level B protection. The activity plan for the initial entry was to sample the on site waste water treatment system (WWTS) for hazzard categorization and to determine indoor exposure potentials. Monitoring was non-detect for volatile organic compounds, did not exceed the LEL and Oxygen levels were appropriate. The entry was discontinued and the entry team recalled when radiation equipment registered levels above background at the entry way to the basement. The second entry utilized the more precise SAM rad meter for isotope detection. Initial radiation detects could not be confirmed. Results from the entry event will allow for Level C protection with splash guard while workers are inside.

Monitored and pumped approximately 2,000 gallons of contaminated surface water accumulation into an on site Baker tank for treatment and disposal. 8,200 gallons of surface water accumulation has been pumped to date.

Sampled 115- 55gallon drums. 59 samples have been Haz-catted. Samples are being pulled in level B while hazcatting is conducted in level C. Continued to stage drums and clear debris from south staging area for future hazzard categorization.

Monday May 19, 2003
START (6), EQM (5), EPA OSC and DEQ (3) personnel on site. Cleared out remaining debris from south side staging area. Started bulking waste streams and anticipate the arrival of 2-6,500gallon Baker tanks tomorrow for the storage of bulked wastes.

START members continued to hazcatt south side drum samples. START members also made an entry into the building assisted by DEQ representatives to collect samples from various leaking drums, vats, and floor drains.

Next Steps
Where appropriate, continue bulking hazardous waste by waste stream and remove via vacuum truck, baker tank, or drums, for proper disposal. Continue staging and HAZCATing unknowns, manage on site water accumulation, and removing contaminated debris. Characterize sludges and liquids beneath vats in plating room. Remove all sludges and liquids from floor and wastewater treatment unit. Remove all other hazardous substances at the facility.

response.epa.gov/ColumbiaAmericaPlatingCo