

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

Date: Friday, May 23, 2003

From: Marc Callaghan

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Subject: Interim
Columbia American Plating Company
3003 NW 35th Avenue, Portland, OR
Latitude: 45.5442000
Longitude: -122.7189000

POLREP No.: 2	Site #: 10BD
Reporting Period: 5/20-23/03	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

Tuesday May 20, 2003

START (6), ERRS (5), USCG (1), and EPA OSC personnel on site. The site has been broken up into the following management areas: South Side, North Side and Facility storage areas. The South and North storage areas are entirely outside. The majority of the stabilization and management to date has been to the south of the facility in an area we have designated the South Side Management Area (SSMA). All work being described below is taking place primarily in this area.

ERRS Mobilized 2 lined roll off bins and 2-6,500 gallon Baker tanks today. The roll off bins will be used to transport and properly dispose of hazardous waste debris that will be encountered on site. The Baker tanks will be used to consolidate compatible materials for future disposal. ERRS used hazard categorization results and compatibility testing to consolidate 90 drums or approximately 4,700 gallons into one onsite Baker tank. On site water accumulation continues to be pumped into the vertical 20K gallon Baker tank (total volume to date-8,100gallons)

START has sampled an additional 181 drums today (410 total to date). There are an additional 71 drums remaining in the South Side staging area that will need to be sampled. Hazard categorization testing continued.

Wednesday May 21, 2003

START (6), ERRS (6 + (2 half day)), USCG (1), and EPA OSC personnel on site. START crew completed the following tasks today: sampled 71 drums withing the South Side Management Area (SSMA), A total of 481-55gallon drums were located here; continued to hazard categorize 136 drum samples (422 total); accompanied 2 ODEQ staff on site while they collected two liquid samples; conducted a Level A entry into the SSMA to collect samples from 4 drums known to contain hydrofluoric (HF). The increased level of protection was necessary because of the increased dermal risk presented by

HF.

ERRS staff completed the following tasks: recovered private property for a client of Columbia American Plating Co from a tank containing a reported 3-5% HF solution (the items were recovered, triple rinsed, and the rinsate sampled prior to release); bulked approximately 3,300 gallons of compatible materials. One cylindrical 6,500 gallon baker tank is full of acidic solution and will be profiled for proper transport and disposal. The other cylindrical tank contains approximately 1,700 gallons of bulked solution. 30 to 40 drums have been identified as caustic solutions, have been segregated and will be disposed of properly.

EPA, DEQ and the City of Portland's Fire Marshal conducted a press conference on site. The conference was attended by members of TV, radio, and print media. Later in the day 5 members from EPA's Oregon Operations Office conducted a multi-media inspection and site tour. Members in attendance included Bruce Long, RCRA Inspector; Mike Slater, Brownfields Coordinator; Judy Smith, Community Involvement Coordinator; Helen Rueda, TMDL Coordinator, and Christine Psyk, Director Oregon Operations Office.

Thursday May 22, 2003:

START (6), ERRS (8), USCG (1), and EPA OSC personnel on site. START collected 140 liquid samples from vats within the plating shop. All vats within the plating shop were sampled (a total of 140). The vats were inventoried and photographed, content volumes were estimated and described. A sample of each liquid phase (if present) from each vat was sampled using a drum thief. All vat samples were delivered to the hazard categorization station for further processing.

START collected 72 liquid samples from the drums staged in the Plating Shop.

START hazard categorized a total of 165 liquid samples from the drums and vats. To date the START team has hazard categorized a total of 587 samples.

ERRS bulked approximately 4,500 gallons of acidic solution waste into Baker tank #2. Baker tanks 1 and 2 are now at capacity with 6,200 gallons each. A third Baker tank has been ordered. ERRS staged 83 fifty-five gallon drums and approximately 275- 5gallon buckets from the Plating Shop in preparation for sampling by START. ERRS resumed segregation of lab chemicals for future over-packing and disposal.

Friday May 23, 2003

START (6), ERRS (8), USCG (1), and EPA OSC personnel on site.

START conducted demobilization activities in anticipation of the Memorial Day holiday. The Level A Truck and the Mobile Command Post were cleaned and restocked, to the extent possible, with supplies on site. Additional supplies, available from the START warehouse, will be restocked upon return to Seattle. All samples were stored and locked in the Equipment Trailer. Supplies that did not need to remain in strict custody (SCBAs, PPE) were stored in the Tactical Shelter. The decon line and Hazcat station were broken down and secured. New lists of equipment remaining on site vs. returned to the Seattle or Portland response centers, were generated. Upon arrival in Seattle, the MCP was restocked and returned to the Federal Center South warehouse. The Level A Truck was restocked and left in the START warehouse. Additional needed supplies were staged in the warehouse for transport to site on Tuesday.

ERRS bulked approximately 50 drums (approximately 2000 gallons) of acidic solution waste into Baker Tank 3.

ERRS retrieved and staged containers from the Plating Shop for sampling by START.

ERRS conducted demobilization activities in anticipation of the Memorial Day weekend. The ERRS covered the vats associated with the waste water treatment system to prevent accumulation of precipitation, covered and secured all Baker tanks, and set up pumps and hoses for quick deployment in the event of a storm over the holiday.

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