

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

Date: Friday, October 10, 2003

From: Marc Callaghan

To: Chris Field, USEPA
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Subject: Interim

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

POLREP No.:	13	Site #:	10BD
Reporting Period:	August 21-October 11,2003	D.O. #:	64-10-16
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

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.

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.

See initial Polrep for further background information.

Current Activities

THURSDAY, AUGUST 21, 2003

EPA'S contractor Environmental Quality Management (EQM) confirms receipt of the EPA's Statement of Work (SOW) in a letter dated today. EQM's Work Plan addresses the removal activities remaining to be completed on site. These next steps were developed based on subsurface analytical data collected during geo-probing activities.

In general the remaining work will include the following:

1. Gold and Silver Plating Rooms; dispose of debris, remove contaminated shelving and flooring and replace flooring with plywood.
2. Main Plating Area; pressure wash the precious metals, catch basin and flooring, transport metals to a

recycler with proceeds being credited to the project.

3. Wastewater Treatment Area; remove any loose material located around the tanks that was once contained within these units.

4. Cyanide Room; decontaminate with mild bleach solution and Hudson Sprayer.

5. Liquids generated during this effort will be placed into a poly tank and sampled for transportation & disposal. Debris will be managed as RCRA hazardous waste

6. Arrange for the proper transportation and disposal of site wastes, in accordance with applicable regulations, to approved disposal facilities.

No new funding sources or documents were created to support the work defined in the above mentioned SOW. Monies allocated in the document entitled "Action Memorandum Amendment #1" and identified as the 10-15% contingency cost will be used to support this effort.

EPA contractors will mobilize back to the site on September 15, 2003 to begin this remaining work.

THURSDAY, AUGUST 28, 2003

EPA's Office of Regional Council (ORC) sends a Certified Letter to the Columbia American Plating Company regarding a "Notice of Potential Liability and Intent to Perfect a Federal Lien" on the property located at 3003 NW 35th Ave. The lien is intended to secure payment to the United States for costs and damages associated with the removal actions occurring there.

MONDAY, SEPTEMBER 15, 2003

START (1), and ERRS (6) members on site. This was the first day of work on site since late July 2003. EPA and START contractors have spent the interim time receiving, evaluating and determining next steps based on all subsurface data collected. START continued to provide oversight and photodocumentation of all site activities. Their role included signing the waste profiles for slag/soil pile in the South Side Area and for liquids contained in the 3,000 gallon upright tank located near the wastewater treatment area (WWTA).

START contacted John Senff (Hallmark) to discuss gold recovery from gold plating vat. It is determined that there is enough value in solution that Hallmark will do the gold recovery. ERRS is given this information and arranges for pick up of the liquids for recovery.

ERRS activities included the following:

1. segregated and conducted gross decontamination of precious metals associated with the plating lines for reclamation.
2. completed pulling up, stripping/decontaminating all flooring materials (primarily in the main plating area), except the flooring, from the gold and silver plating rooms for disposal as RCRA waste. Walls of both rooms are grossly decontaminated (sprayed down with water).
3. completed clean up of miscellaneous debris from around tanks in the WWTA.

TUESDAY, SEPTEMBER 16, 2003

START (1), and ERRS (6) members on site. START provides oversight and photodocumentation of all site activities.

ERRS activities included the following:

1. takes metals of value from within the plating shop to reclaimer (Calbag Metals Co.) and returns with cash.
2. completes removing flooring from the gold and silver plating rooms for disposal as RCRA waste,
3. begins replacing contaminated flooring with new plywood flooring.

WEDNESDAY, SEPTEMBER 17, 2003

START (1), and ERRS (6) members on site. START provides oversight and photodocumentation of site activities.

START signs hazardous waste manifest for liquids pumped from the 3,000 gallon tank in WWTA, remaining acid waste, and mercury thermometers found at the facility.

ERRS completed the following:

1. completes pumping liquids from 3,000 gallon upright tank in WWTA.
2. completes installation of new plywood flooring in gold and silver plating rooms.

3. takes more metals of value from within the plating shop to reclaimer (Calbag Metals Co.). Two trips are made today for reclaiming of metals from plating shop.
4. provides acid from tote found in office area as well as approximately 20 mercury thermometers for removal from site by PSC.
5. prepares hoses and pressure washers for gross decontamination of main plating shop area tomorrow.

THURSDAY, SEPTEMBER 18, 2003

START (1), and ERRS (6) members on site. START provides oversight and photodocumentation of site activities, signs hazardous waste manifest for removal of slag/soil pile from SSA and documentation for removal of gold solution.

START begins demobilizing from office trailer.

ERRS was responsible for the following:

1. provides courier with gold solution from gold plating vat for gold recovery by Hallmark.
2. begins gross decontamination of main plating shop area.
3. completes removal of slag/soil pile from SSA.
4. completes discharge of waters from 20,000 gallon Baker Tank to City of Portland Storm Sewer. City of Portland is on site and collects samples from this discharge.
5. breaks down decontamination line and sweeps SSA.
6. completes gross decontamination of cyanide room with bleach solution.

FRIDAY, SEPTEMBER 19, 2003

START (1), and ERRS (6) members on site. START was responsible for completing the following: providing oversight and photodocumentation of site activities, signing hazardous waste manifest for removal of liquids pumped by vacuum truck, completing demobilization from office trailer.

ERRS completes the following:

1. final rinse of main plating shop area. ERRS vacuums all rinse waters into a tanker provided by Burlington Environmental.
2. rinses out 20,000 gallon Baker Tank for removal. Baker Tank is removed from the site.
3. sprays down pavement in SSA with water.
4. completes demobilizing from office trailer.

Items removed from site today included: dumpster, fencing, water coolers, rented equipment.

Items to be removed on Monday: office trailers, 2 roll-off bins containing RCRA debris.

Remaining issue: opening of storm drains on site.

THURSDAY OCTOBER 2, 2003

EPA's Project Manager (Marc Callaghan) and Ecology and Environment (Erin Lynch), met with the following individuals with the City of Portland's Bureau of Environmental Services (BES) to discuss next steps on site:

Gerald W. Baumgartner, Industrial Source Control Manager
Miguel Santana, Manager Industrial Pretreatment Program
Angela Henderson, Permit Manager
Marveita Redding, Environmental Compliance Manager
Aaron B Wieting, in the Industrial Stormwater Program.

The meeting served to discuss the following topics: 1) Past Discharge Violations, 2) Next Steps on Site, and 3) Correcting Misinformation Contained Within EPA's Administrative Record and Action Memorandum.

1) Past Discharge Violations: Contamination on site and outside the facility still exists. Recent analytical data indicates that elevated metal concentrations in exceedance of the existing facility permit remain on site. This is of concern because on site water accumulation continues to collect at two onsite low areas or catchbasins. The catchbasins were originally intended to drain on site water outside the facility via the city stormwater system. This system has been plugged and should not be opened until contaminant concentrations can be addressed.

2) Next Steps: EPA contractors will mobilize back on site to begin decontaminating the outside surface areas designated as the South Side (SSSA) and North Side Staging Areas (NSSA).

3) Information related to the BES and contained within the Administrative Record (a collection of records on file at the local library) and the Action Memorandum needs to be corrected. Corrections will be addressed by the BES and submitted to EPA to be entered into the existing Administrative Record as an Addendum.

Planned Removal Actions

EPA contractors will mobilize back to the site the week of October 14-17 to begin decontaminating the SSSA and NSSA.

This process will include pressure washing the surface, collecting, and analyzing the the rinse waters prior to discharge or removal off site.

Next Steps

Work within EPA has begun to transition this project from that of a Federal Superfund Emergency Response and Removal Action to that of State oversight. Work has begun at EPA to contact Site Assessment and Brownfields coordinators to assist in this transition. Legally EPA's Office of Regional Council has placed a lien on the property and continues to explore cost recovery options.

Key Issues

1) WASTE STREAM TRACKING:

- Please refer to Polrep #5 for waste removed from the site between 6/16-7/11/2003.
- Please refer to Polrep #12 for waste removed from 7/11 on.

2) PUBLIC DOCUMENTS:

-The Administrative Record for this site is available for Public review at the Multnomah County Central Library located at 801 SW 10th Ave./ Portland, OR 97205. The Administrative Record can be located in the Government Documents Collection. Mary Goldie is the Library Contact.

-Please refer to Documents link at the bottom of this page for Spreadsheets Tracking Accomplishments and Wastestreams leaving the site.

response.epa.gov/ColumbiaAmericaPlatingCo