



United States Environmental Protection Agency
Region 10 Emergency Response Unit
POLLUTION REPORT

I. HEADING

Date: September 8, 2001
Subject: Industrial Chrome Plating
From: Dan Heister, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (503) 326-6869
TO: See Distribution List on last page

POLREP No.2

II. BACKGROUND

Site ID: 8P
Delivery Order No: E-01-001
Response Authority: CERCLA
FPN No: 987175064
NPL Status: NA
State Notification: Oregon Department of Environmental Quality
Action Memo Status: August 2001
Removal Start Date: August 27, 2001
Expected Completion Date: October 2001

III. SITE INFORMATION

A. Incident Category

Fund Lead Removal Action

B. Site Description

1. Site Location

The Industrial Chrome Plating site is located in a mostly residential neighborhood on the southeast corner of NE 62nd Avenue and NE Hassalo Street in Portland, Oregon. The Portland Rifle Club and Deluxe Fuel are west of the site; an empty lot is to the east. The southern boundary of the property borders the City of Portland's Tri-Met transportation railroad track and Interstate Highway 84, which are in a swale known as Sullivan Gulch.

The site consists of a main building and an outside storage area on 0.27 acres. The main building is separated into two parts: the northern portion and the southern portion. Most of the plating tanks are in the northern portion, while the southern portion contains a few smaller plating tanks and an area set aside for buffing and polishing parts. A small office is in the northwest corner of the building. The south side of the property has an asphalt driveway, a small patch of grass, and a large cellular communications tower. The southern portion of the property is fenced. Immediately south of the fence the terrain slopes steeply down for 15 to 20 feet into Sullivan Gulch and railroad tracks. Runoff water from the site flows to the gulch and railroad tracks, and access is unrestricted. The empty lot to the east of the site is fully fenced and contains a large advertisement billboard, and some parked trailers and boats. The east property boundary is fenced at the south end of the property and the building wall makes up the north end. Areas of gravel and broken asphalt make up a ten foot wide strip between the property and NE 62nd Avenue. On the west side of 62nd Avenue is the Portland Gun Club to the north and Deluxe Fuel to the south. North of the site is a residential neighborhood. Three houses are located directly across the street and one on the opposite corner of NE Hassalo and NE 62nd Avenue.

C. Assessment Results

In March of 1999, the EPA tasked Ecology and Environment Inc. (E & E) Superfund Technical Assessment and Response Team (START), to assess the risks associated with the Industrial Chrome Site. An integrated assessment of the site was conducted which identified elevated concentrations of chromium and lead at depth and in the surface of a majority of the samples. Based on the analytical results from this sampling event, the EPA tasked Ecology and Environment, Inc. to conduct a removal assessment at the ICP site to determine the full extent of surface and subsurface contamination both on and surrounding the ICP property.

Removal assessment results indicated the presence of hexavalent chromium in the surface soil contamination on the south and east sides of the building. Subsurface soil contamination is concentrated in the first ten feet on the south and east sides of the building. However, in the vicinity of the dry well (southeast of the building), significant subsurface soil contamination extends to a depth of at least 30 feet bgs, and subsurface soil. Subsurface soil samples collected from beneath the building also contained significant levels of contamination. Assessment of subsurface contamination west and south of the buildings was incomplete because overhead and subsurface utilities interfered with access to this area.

Many detections of lead in samples collected on the ICP property exceed Region 9 Preliminary Remediation Goals and/or Oregon Cleanup Levels.

Six people worked at the site until it voluntarily ceased operations in August 2001. The site is located in a mixed commercial/industrial and residential neighborhood with homes as little as 100 feet from the property to the north. Access to the site is not completely restricted, thereby increasing the potential for humans and animals to come in contact with contaminants. Soils to the south and east of the ICP building are fenced, preventing access to the area. Some of this area is capped with grass or asphalt; however, most of the contaminated area is exposed soil. Access to contaminated soils on the north and west side of the building is unrestricted. Soils on surrounding residential properties do not contain chromium above regulatory levels.

The possibility for off-site migration of chromium and lead, specifically via direct exposure to soil, particulates, surface water runoff, and groundwater can be reduced only if contaminated surface and subsurface soils at the site are removed or immobilized.

In August 2001, EPA obligated funds to conduct a removal of the soil contamination at the Industrial Chrome site which will involve: razing the building; excavating and properly disposing of contaminated soil and debris; and restoring the property so that it may be used in the future.

IV. Removal Activities

A. Situation

1. Current Situation

September 4, 2001 (Tuesday)

Personnel on site: Environmental Quality Management (EQM, 5 contractors), Rocky Mountain Catastrophe (RMCat, 2 contractors), Superfund Technical Assessment and Response Team (START, 3), US Coast Guard (USGC, 1), and USEPA Federal On-scene Coordinator (FOSC, 1) = Total of 13. Weather: sunny with a high of 80° F expected.

START began monitoring for off site migration of contamination (metals and particulate dust). All high-volume air samples were collected at the end of the day. The PDR data were downloaded into individual files. START enters building before demolition to photo-document interior of building. EQM finishes vacuuming inside of plating shop, primary areas of concern are the floors, rafters, and any other horizontal surfaces (e.g., window sills and tabletops) where dust could accumulate. EQM conducts the second

walk-through for building demolition. EQM decontaminate and remove all equipment before building demolition. Metro Metals Northwest, Inc. picked up the remanding scrap metal from the interior of the building.

September 5, 2001 (Wednesday)

Personnel on site: EQM (4 contractors), RMCat (2 contractors), START (3), USGC (1), and FOOSC (1) = Total of 12. Weather: Partly cloudy skies with a chance of rain, high in the upper 70s expected.

START begins monitoring for off site migration of contamination (metals and particulate dust). All high-volume air samples were collected at the end of the day. The PDR data were downloaded into individual files.

START to photo-document building demolition. START collect two surface soil samples. The final high volume air sampler was calibrated at the end of the day.

EQM schedule for the day is the removal of automobiles for the adjacent lot, the final walk through, and building demolition. Speedy Auto Towing onsite to tow and store automobiles from adjacent lot. EQM conducts the final walk-through for building demolition. EQM demolished building in the afternoon. The debris were placed into two piles, one to be removed to a Subtitled D landfill in Roosevelt, Washington and the other will be disposed of in a Subtitle C landfill in Arlington, Oregon.

September 6, 2001 (Thursday)

Personnel on site: EQM (4 contractors), RMCat (2 contractors), START (2), USGC (1), and FOOSC (1) = Total of 11. Weather: Sunny with a high in the upper 70s and a slight breeze from the south.

START begins monitoring for off site migration of contamination (metals and particulate dust). All high-volume air samples were collected at the end of the day. The PDR data were downloaded into individual files.

Burlington Environmental, Inc. located in Tacoma, Washington onsite to remove and disposal of the plating solution. The baker tank was decontaminated and the decontamination rinse was added to the plating waste. A total of 4,000 gallons of plating waste was removed and disposed of. The building debris was loaded into 4.5 trucks and taken to the Roosevelt Regional Landfill in Roosevelt, Washington. After the debris was removed, two tanks (which were inset in pits, could not be removed until after the building demolition) were picked-up and placed on the Subtitle C debris pile. The debris fell out of the bottom of the tanks. A mini-excavator was used to remove the debris out of the two tank pits. In the second pit, the excavator bucket picked up a bucketful of orange-brown

liquid and vapor-suppressant plastic balls. The proximity of the billboard to these tanks meant that the billboard will have to come down.

September 7, 2001 (Friday)

Personnel on site: EQM (5 contractors), RMCat (2 contractors), START (2), USGC (1), and FOOSC (1) = Total of 12. Weather: Sunny with a high in the lower 80s is expected.

START begins monitoring for off site migration of contamination (metals and particulate dust. All high-volume air samples were collected at the end of the day. The PDR data were downloaded into individual files. EQM begins breaking up building foundation, will separate foundation debris into two piles, Subtitle C debris and possible Subtitle D debris. Large Baker tank was removed offsite, to replaced with a smaller tank. The final scrap metal was picked up by Metro Metals Northwest, Inc.

2. Removal Actions to Date

September 4, 2001

Type	Quantity	Location Where Taken
Scrap metal for recycling only	6,340 pounds	Metro Metals Northwest, Inc

September 5, 2001

Type	Quantity	Location Where Taken
Automobiles, trucks, a bus, and a boat	14	Speed Auto Towing, for storage

September 6, 2001

Type	Quantity	Location Where Taken
Plating solution	4,000 gallons	Burlington Environmental, Inc.
Nonhazardous building debris	275,000 pounds (4.5 truck loads)	Roosevelt Regional Landfill

September 7, 2001

Type	Quantity	Location Where Taken
Scrap metal for recycling only	9,020 pounds	Metro Metals Northwest, Inc

3. Enforcement

Enforcement actions are being reviewed at this time by EPA.

B. Planned Removal Activities

In the next few weeks, the following actions will occur in the following order: EQM will finish the building demolition, soil contaminant characterization by START, shoring decisions, excavation, backfill of soil, and an asphalt cap. Surface soils will be collected by E & E personnel. Subsurface soil samples will be collected with a Geoprobe, a hydraulically-driven sampler. After the soil is removed and replaced, an asphalt cap will be placed over the property.

C. Next Steps

EPA and E&E to continue to conduct air sampling and site documentation for the removal action until completion. EPA and E&E are planning to conduct soil sampling, air sampling, X-Ray Fluorescence metals screening, subsurface soil contaminant delineation utilizing a hydraulically driven sampler, confirmation sampling, and site documentation for the removal action until completion.

V. Cost Information

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs (as of 9/8/01)
EPA	\$37,000	\$4,250
START	\$45,000	\$41,000
ERRS	\$400,000	\$240,300
Total	\$482,000	\$285,550

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. 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.

VI Disposition of Wastes

Only contaminated plating solutions and building debris have been removed from site. The removal contractor is preparing the necessary documentation for proper disposal. Several disposal facilities may be utilized to remove all of the wastes. Only non hazardous wastes mentioned above in current removal actions have been disposed.

VII Distribution

To:

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Chris Field, Mary Matthews, OSCs, EPA Region 10 Emergency Response Unit
Oregon Department of Environmental Quality, Attention: Chuck Donaldson,
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EPA Oregon Office, Attention: Dan Opalski

VII Status

Site actions continue.