United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Friday, March 19, 2004
From: Marc Callaghan, Dan Heister & Michael Szerlog

Subject: Progress POLREP
Thermo Fluids
6400 SE 101st Street, Portland, OR

POLREP No.:	2	**Site #:**	763
Reporting Period:		**D.O. #:**	
Start Date:	3/15/2004	**Response Authority:**	OPA
Mob Date:	3/15/2004	**Response Type:**	Emergency
Demob Date:		**NPL Status:**	
Completion Date:		**Incident Category:**	
CERCLIS ID #:		**Contract #**	
RCRIS ID #:		**Reimbursable Account #**	
FPN#	E04003		

Site Description
See Initial Pollution Report (Pol. Rep. #1).

Current Activities
EPA and START in conjunction with other federal, state, and city regulatory and health agencies, continue to monitor the progress of the removal action at the facility. NRC, the prime contractor hired by the responsible party (RP) Thermo Fluids, Inc., (TFI) for the cleanup, is in the process of removing the oil/water mixture from the on-site drainage ditch where petroleum substances have collected. An estimated 180,000 gallons of liquid is stored in the drainage ditch above a constructed Coffer (underflow) Dam on the west end of the property. Based on analytical data for samples collected by the DEQ, the City of Portland Bureau of Environmental Services (BES) is allowing this material to be discharged at specified rates to the sanitary sewer system. Pursuant to the agreement for discharge, daily composite samples must be collected for chemical oxygen demand (COD), biological oxygen demand (BOD5), and total suspended solids (TSS). Daily grab samples must also be collected after on-site treatment and analyzed for pH and non-polar oil grease. The subject wastewater from the ditch must meet the BES specified criteria before discharge from the site to the city's sanitary sewer at rates of 50 gallons/minute to a maximum of 250 gallons/minute (during a non-storm event).

EPA has continued to monitor sample collection of water and sediment from the on-site drainage ditch and several downstream locations as detailed in the approved Thermo Fluids Sampling Plan. Samples have been collected from: the drainage ditch; immediately below the Coffer Dam on the west end of the drainage ditch (prior to the confluence of the drainage ditch with Johnson Creek); upstream of the outfall in Johnson Creek; and at three downstream locations from the outfall ranging from 100 yards to over a river mile. These samples have been analyzed for semivolatiles(SVOCs), volatiles (VOCs), metals, and polychlorinated biphenyls (PCBs). The first two rounds of sampling under this plan (Tuesday and Wednesday) indicated that no PCBs are present in the on-site drainage ditch and downstream samples. Samples have been collected daily, with volatiles collected immediately downstream of the Coffer (underflow) Dam collected three times during the day. EPA has been collecting at least 10% split samples for verification of the data provided by the RP.

Most of the oil on the surface of the drainage ditch has been collected with a portable oil/water separator used in conjunction with leaf blowers to blow the oil slick toward the separator for removal.

Planned Removal Actions
An ongoing leak from a damaged water line inside the facility has been repaired enabling NRC and TFI operators to begin pumping out an oil/water mixture from the on-site 34,000 gallon pit. This material will be pumped into stationary holding tanks for analysis and proper treatment.

The on-site drainage ditch will be pumped out (with oil/water treated) to allow the excavation of surface soils from the sides and bottom of the ditch which have been impacted by the spill.

A rock dam will be placed in the drainage ditch to secure liquid from running over and/or breaching the Coffer Dam in a storm event.

Sorbent and hard boom (with pads) will continue to be deployed on Johnson Creek in response to any sheen that persists in slow moving areas.

Next Steps

The inventory of products and wastes provide by TFI needs to be reconciled with the facility records to ensure that all wastes are being dealt with properly. This action will be conducted by both EPA and DEQ representatives.

A final disposal plan needs to be completed and approved by the IC for implementation.

The facility pit and surrounding building with at least 100,000 gallons of an oil/water mixture within the facility needs to be pumped and treated.

The facility storm water drainage system which was initially overcome by millions of gallons of oil and water during firefighting efforts will be cleaned to prevent further releases to the drainage ditch.

Key Issues

A plan needs to be completed for dealing with runoff from rain events so that the drainage system is not recontaminated.

Compilation of analytical data collected by the DEQ, EPA, and the responsible party, should be conducted so that informed decisions can be made regarding future sampling and the effectiveness of the cleanup efforts.

response.epa.gov/Thermofluids