

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Stubblefield Salvage - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #1
Initial POLREP
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Greg Weigel, OSC
Date: 10/15/2009
Reporting Period: 10/12/2009 to 10/15/2009

1. Introduction

1.1 Background

Site Number:	10HD	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/12/2009	Start Date:	10/13/2009
Demob Date:		Completion Date:	
CERCLIS ID:	WAN001002813	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Active Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Site is located at 980 NE Myra Road in Walla Walla, Walla Walla County, Washington (46.0646 latitude and -118.3689 longitude). The Site is 11 acres in size and is an operating metals salvage and recycling business. The main salvaging operation consists of a large hydraulic shear used to cut up scrap metal and a large press to compress it into blocks. An abandoned three-story wooden building, which had been used as a rendering plant, is adjacent to the shear and press. Piles of metal scrap cover most of the rest of the Site.

The Site borders Mill Creek to the north, Myra Road to the west, agricultural land to the east, and a single residence to the south. Population within 1/4 mile of the Site is 102.

Stubblefield Salvage and Recycling, LLC (SS&R), has operated at the Site since the 1960s. Historically, the SS&R property occupied a footprint of approximately 40 acres on the outskirts of Walla Walla. Sometime around 1995, the western half of the 40 acres was sold to the City of Walla Walla, who built a waste water treatment plant at that location. EPA is informed that the scrap material that was on the surface of the now City-owned property was pushed to the eastern area of property still owned by SS&R. Prior to 2007, the SS&R-owned property was approximately 22 acres. In the Fall of 2008, the SS&R property was halved again – the west half of the property was sold and all of the scrap material (that was on the surface, at least) on the west half of the property was pushed over to the east half of the property. Presently, a county road (Myra Road) bisects (north/south) at about the middle of the historical SS&R property. The property to the west of Myra Road and east of the waste water treatment plant was reportedly sold to a developer. All of the processing of scrap metal at the Site, including operation of the hydraulic shear and compactor, and the smelter, has reportedly historically always taken place at its present location, within the footprint of the current 11-acre Site. The property that was sold was reportedly used only for storage of scrap metal.

1.1.2.2 Description of Threat

Site soils are contaminated with elevated concentrations of heavy metals (lead, arsenic, cadmium, chromium and mercury), PCBs and carcinogenic PAHs. Contents in deteriorated and/or open containers on Site contain VOCs and other hazardous constituents and present a threat of breaching or overtopping. One

unmanaged drum contains over 50 ppm PCBs. Shingles and corrugated sheet siding material on the ground contain 15% asbestos. Contaminated soils present a threat of exposure to Site workers or visitors who may come into contact with the contaminated soils either through dermal contact or through inhalation of dust. The Site continues to be an operating metals salvage yard and recycling business. Scrap metal is continuously brought onto the Site and moved around the Site with heavy equipment by Site workers. This activity regularly generates large quantities of dust, increasing the likelihood of exposure to hazardous substances through inhalation. Contaminants in soils also present a threat of downgradient migration to Mill Creek, immediately to the north of the Site. Contents of deteriorated and/or open containers on Site contain VOCs and other hazardous constituents and present a threat of breaching or overtopping (with accumulation of rainfall) and losing their contents to the soil. Heavy equipment moving scrap around the Site could easily encounter and crush or puncture one or more of these drums that are scattered among the scrap piles. Friable asbestos containing materials is on surface soils at the Site. Asbestos fibers may be released to air if the material is disturbed.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Washington Department of Ecology referred the Site to EPA Region 10 on April 14, 2009, after determining that likely contamination at the Site was beyond what could be appropriately addressed through their programs. Earlier inspections by Ecology had determined releases to the environment of used oil and other heavy oils, hydraulic fluids, lead and acid contamination from damaged batteries lying uncovered on the ground, and likely polynuclear aromatic hydrocarbon (PAH) releases from spills of used oil and burning of various automobile components on the ground. No sampling was conducted.

EPA conducted a non-sampling Site visit on May 6, 2009, during which he observed the following:

- Approximately 6 large electrical transformers, several of which did not have markings identifying them as containing non-PCB oil, and some of which were leaking oil onto the ground.
- The appearance of heavy oil stained soils in a low area near the hydraulic shear, and other smaller areas of oil stained soil.
- Over 20 drums with unmarked and unknown contents, some of which were open and/or in rusted or damaged condition, and some of which gave off a distinct solvent odor.
- Several large open-top tanks, the largest of which was approximately 800 gallons, that contained a heavy oily substance.
- Broken siding shingles, likely containing asbestos, was on the ground and hanging in damaged condition on the walls of the shop building. The shingles are weathered, broken and friable

EPA has since conducted two sampling site visits with the START contractor in May and in September 2009. Analytical results indicate elevated concentrations of hazardous substances in surface soils on the Site including heavy metals (lead, arsenic, cadmium, chromium and mercury), PCBs and carcinogenic PAHs. Contents in deteriorated and/or open containers on Site contain VOCs and other hazardous constituents and present a threat of breaching or overtopping. One unmanaged drum had over 50 ppm PCBs. Samples of shingle and corrugated sheet siding material on the ground contained 15% asbestos.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An Action Memorandum was approved on September 6, 2009. The removal is being conducted as a Fund-lead action. START and ERRS contractor personnel and equipment mobilized to the Site on October 12, 2009. EPA OSC mobilized on the morning of October 13, 2009.

2.1.2 Response Actions to Date

10/13/09 - Personnel on Site: 5 ERRS, 2 START, 1 EPA. Built a staging area for recovered ERRS drums and started gathering drums from around the Site. Set up office trailer and communications.

10/14/09 - Personnel on Site: 6 ERRS, 3 ERRS subcontractor, 2 START, 1 EPA. ERRS finished gathering drums and staging them in containment area. Total drum count is 60 with liquid content and 19 with sludge. Asbestos abatement subcontractor began removing damaged asbestos siding from the shop building. START set up air monitoring/ sampling stations for asbestos. EPA OSC and START met with a former Stubblefield employee who indicated location of alleged 30 buried drums on property west of Myra Road that was formerly part of the Stubblefield operation, and is now owned by Myra Road Properties, LLC. The allegation is that the drums contain oil drained from transformers that likely contain PCBs. EPA OSC discussed via telephone the removal action with representatives of Washington Department of Ecology.

10/15/09 - Personnel on Site: 6 ERRS, 3 ERRS subcontractor, 3 START, 1 EPA. ERRS hazard categorized and consolidated drum waste for disposal. Gathered waste car batteries from a battery disposal area, and various cylinders around the Site - 2 cylinders were identified as anhydrous ammonia cylinders. ERRS subcontractor continued abatement of damaged asbestos siding on building. START continued air monitoring/sampling for asbestos and Site documentation. EPA OSC and START met with representatives of Myra Road Properties, LLC, that own property west of Myra Road where there are alleged buried drums from former Stubblefield operation. OSC had already received a signed consent for access agreement to the property. Property owners agreed to clear vegetation in area of concern - approximately 2 acres. START is arranging for a geophysical survey of the area to confirm and identify location of buried drums. This work will be conducted under a separate START TDD. EPA OSC met on-Site with representatives from Walla Walla County to discuss the removal action.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Identified PRPs include Stubblefield Salvage and Recycling, LLC, as well as its owners and officers.

2.1.4 Progress Metrics



Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Complete removal of drummed hazardous wastes. Excavate and remove for disposal contaminated surface soils that exceed action levels for metals, PAHs and PCBs (Washington State ARARs are being used for cleanup levels, where practicable considering the exigencies of the situation). Complete removal of friable asbestos containing material.

The present mobilization is Phase I of the planned removal, to address surface hazardous substances and contamination. Additional planning and engineering is required for the Phase II part of the removal, to address a soil contaminant source area at depth that extends beneath the heavy hydraulic equipment and building. START is preparing an engineering alternatives analysis to identify options to excavate the accessible contamination and address the mobility potential of contamination under the equipment and building. Mobilization for Phase II of the removal is anticipated in November.

2.2.1.2 Next Steps

ERRS will manage disposal of drummed waste. ERRS subcontractor will complete abatement of damaged asbestos siding on shop building and will address the large pile of asbestos containing panels that is intermingled with metal scrap and dirt in the NE corner of the Site. ERRS will provide support for moving material with loader and/or excavator. START will identify "hot spots" of metals contaminated soils (including former battery storage areas) in upland area of Site that exceed action levels for excavation by ERRS.

2.2.2 Issues

In addition to the planned removal, a concurrent effort is underway to evaluate the existence and location of alleged buried drums on the property directly to the west of the Site, that was formerly part of the Stubblefield Salvage operation. The adjacent property is considered, at this time, a separate site.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

As of 10/15/2009:

ERRS - 5
 ERRS subcontractor - 3
 START - 3
 EPA - 1

5. Definition of Terms

PAHs - Polycyclic Aromatic Hydrocarbons
 OSC - On-Scene Coordinator
 PCBs - Polychlorinated Biphenyls
 ARARs - Applicable or Relevant and Appropriate Requirements
 VOCs - Volatile Organic Compounds

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.