

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #3
Progress
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Greg Weigel, OSC
Date: 3/16/2010
Reporting Period: 10/24/2009 - 3/16/2010

1. Introduction

1.1 Background

Site Number:	10HD	Contract Number:	
D.O. Number:		Action Memo Date:	9/6/2009
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:	10/23/2009	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

See POLREP 1.

1.1.2.1 Location

1.1.2.2 Description of Threat

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP 1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An Action Memorandum was approved on September 6, 2009. Phase 1 of the removal, addressing surface hazardous waste issues, including the characterization and removal of drums of hazardous waste, excavation and removal of lead-contaminated surface soils, and removal of friable asbestos containing material, was completed on October 23, 2009. Known remaining contamination at the site includes surface and subsurface soils with high concentrations (above residential land-use screening levels) of PCBs, SVOCs and various metals. The contaminated area is underneath and downgradient of the main materials processing area, where heavy hydraulic equipment (including a large metals shredder and bailer) has been observed to be leaking, and has reportedly been leaking for 30 years. The conceptual site model for this area is that the equipment has been leaking hydraulic fluid more or less continually for 30 years, and that there have reportedly been other larger releases from the hydraulic oil storage tank utilized by the equipment. It has also been reported that various used oils, including potentially PCB contaminated transformer oils, have been used in the equipment. As a result, the soils in the area and extending north towards Mill Creek appear to be oil saturated. Analytical data from geoprobe samples collected in September, 2009 show high concentrations of PCBs and SVOCs and some metals up to 8 foot depth.

2.1.2 Response Actions to Date (for reporting period)

EPA's START contractor completed a Technical Memorandum: *Alternatives Evaluation for the Stubblefield Salvage Yard* addressing this decision area on March 5, 2010, which identified possible removal alternatives

and data gaps. A significant data gap is full characterization of the vertical or horizontal extent of contamination, and potential impact of contaminated soils to ground water. Additionally, groundwater gradient is not known, but is thought to flow north toward Mill Creek, approximately 150 feet north of the known contamination. To address this data gap and be able to select and design a removal action that is protective of public health and the environment, the OSC determined the need to install temporary groundwater monitoring wells and conduct additional soil sampling.

On 3/15/10, the EPA OSC and START contractor re-mobilized to the site to install 4 groundwater monitoring wells and conduct additional borings to collect soil samples in order to better delineate the vertical and lateral extent of contamination. In the afternoon we identified boring locations and conducted a utilities locate.

On 3/16/10, the drilling subcontractor arrived, and installed the first 2 monitoring wells. Soil samples were collected for laboratory analysis.

Also on 3/16/10, the OSC and START contractor met with the property owner of the property west of the current Stubblefield Salvage site (referred to as the Myra Road property), which was formerly part of the salvage operation and was sold 2 years ago. This was to follow up on the geophysical survey of that property that was conducted on October 20, 2009. The OSC had tasked START to conduct the survey as a result of a former employee who alleged that he had participated in the burial of drums at the property in 2001. The geophysical survey had been inconclusive regarding the identification of any buried drum locations, but had recommended the digging of test pits at several locations where anomalous anomalies had been detected. The OSC had arranged with the property owner, who also owns an excavation company, to dig the test pits with OSC and START oversight. Five test pits were dug at pre-selected locations, based on the previous geophysical survey. Test pits were dug from 6 to 11 feet depth. Nothing to indicate the possibility of buried drums was found. This activity concludes the Myra Road investigation.

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

From Phase 1 removal:

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-RCRA lead soils	Soils	75 cy			
Asbestos waste	Soils	150 cy			
PCB oils and sludge		7 drums			
PCB oils and water		11 drums			
Non-TSCA PCB debris		40 cy			
Paint related material		3 drums			

2.2 Planning Section

2.2.1 Anticipated Activities

Data from groundwater and soils sampling will be evaluated to determine a proper removal course of action.

2.2.1.1 Planned Response Activities

Installation of the 4 monitoring wells and soils and groundwater sampling is expected to be completed by 3/19/10.

2.2.1.2 Next Steps

2.2.2 Issues

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 3/16/2010:
START - 3
START subcontractor - 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
ACM - Asbestos Containing Material
MTCA - Washington State's Model Toxics Control Act

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.