

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #4
Progress
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Greg Weigel, OSC
Date: 6/16/2010
Reporting Period: March to June, 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)

On March 5, 2010 EPA's START contractor completed a Technical Memorandum: *Alternatives Evaluation for the Stubblefield Salvage Yard*, which identified removal alternatives and data gaps regarding soils

contamination underneath and downgradient of the main materials processing area (the "source area"), that were not addressed in the Phase 1 removal.

On March 15, 2010 the EPA OSC and START contractor re-mobilized to the site to install 4 groundwater monitoring wells to evaluate potential groundwater contamination and groundwater flow gradient and direction, and conduct additional borings to collect soil samples in order to better delineate the vertical and lateral extent of contamination in the source area.

On June 15, 2010 the START contractor submitted a final Final Technical Memorandum: *Monitoring Well Installation at the Stubblefield Salvage Yard*. Groundwater sample analysis showed that no analyzed constituents exceeded applicable Washington State MTCA screening criteria (which were identified as ARARs for the site). Aroclor 1242 (PCB), however, was observed in groundwater downgradient from the source area at a level that exceeds the more conservative EPA Regional Screening Level. Soil sample analytical results supported the areal extent of the source area identified in the *Alternatives Evaluation*.

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. Phase 1 removal activities at the site were conducted as EPA Fund-lead. It is anticipated that EPA will attempt to negotiate a consent agreement with PRP(s) for necessary Phase 2 cleanup of contaminated soils in the source area.

2.1.4 Progress Metrics

From Phase 1 removal:

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
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

EPA will send a letter to PRP(s) inviting them to enter negotiations for a consent agreement to implement Phase 2 removal activities, to excavate and remove contaminated soils in the source area necessary to protect public health and the environment.

2.2.1.1 Planned Response Activities

Implement Phase 2 removal of contaminated soils by summer of 2010.

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

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.