

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #1
Initial POLREP
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffrey Rodin, OSC
Date: 7/27/2010
Reporting Period: July 19 - July 28

1. Introduction

1.1 Background

Site Number:	10HF	Contract Number:	ER-R7-07-02
D.O. Number:	0029	Action Memo Date:	5/13/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	7/26/2010	Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:	WAN001002793	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Time Critical Removal Action

1.1.2 Site Description

RAMCO occupied a building located within the Dallesport Industrial Park, where it extracted aluminum from dross it received from primary aluminum smelters. Dross is a by-product from the primary smelting process, and the major constituents of dross are aluminum, aluminum oxides, mixtures of nitrides, mixtures of chlorides, and traces of other impurities.

1.1.2.1 Location

The disposal site is located in the Dallesport Industrial Park, which is owned and operated by the Port of Klickitat. The industrial park is a mixed light and heavy industrial facility, and is approximately two miles east of the small community of Dallesport, Washington. The 2007 population of Dallesport is 1,239.

1.1.2.2 Description of Threat

The contaminants of concern (cyanide, polycyclic aromatic hydrocarbons [PAHs], ammonia, and metals including aluminum, cobalt, copper, iron, manganese, and vanadium) are potential hazardous substances or pollutants or contaminants as defined by sections 101(14) and 101(33) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended, 42 U.S.C. section 9601(14) and (33).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The waste in the landfill contains up to 28 percent aluminum, up to 8 percent sodium, up to 2.8 percent magnesium, up to 2.1 percent calcium, up to 1.5 percent potassium, plus lesser amounts of chromium, manganese, iron, copper, nickel, and zinc.

The waste material placed in the landfill produced ammonia gas when wet. The odor of ammonia has been detected in the past during direct push soil sampling, groundwater monitoring, and after rainfall events.

Nitrates, sodium, chloride, and total dissolved solids in groundwater have been measured at levels exceeding primary or secondary water quality standards. Because major salt-forming chemical elements (sodium, calcium, potassium) measured during groundwater sampling exceeded levels of these elements found in seawater, there is a strong indication that salts from the landfill are leaching into groundwater.

Leaching tests performed to determine whether the waste is a Dangerous Waste indicate that metals also could leach from the aluminum waste. However, groundwater monitoring thus far has not shown elevated levels of metals attributable to leaching from the landfill.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Week of July 19-23

ERRS Contractor began mobilization of equipment and office trailers to site. Coordinated with Port of Klicitat (property owner) for use of staging areas and fill material.

7/26/10 Monday

- EQM excavated top soil on top of contaminate layer on the eastern side of site. Water spray used to control dust. START monitored for particulates down wind of excavation
- EQM excavated contaminate from eastern side of the site into a stock pile near center of the site. Water spray used to control dust. START monitored for particulates, ammonia and hydrogen cyanide. All constituents being monitored were below action levels.
- USCG Representative, Jeremy Thomas arrived onsite.
- Contact was made with the US Army Corps of Engineers Dalles Dam visitor center, Dallesport fire & ambulance service. All parties were provided with a fact sheet for the removal activities. A fact sheet was also posted at the nearby Spearfish lake recreation area.

7/27/10 Tuesday

EQM continued to excavate contaminate material from eastern side of the site into a stock pile. Water spray was used to control dust. START monitored for particulates, ammonia and hydrogen cyanide. All constituents being monitored were below action levels.

- USACE representative was given a tour of the site. EPA/OSC Rodin discussed plan to remove boundary fence so that the northwest rim of the site pit could be excavated. EPA/OSC Rodin communicated to the USACE representative that construction best practices would be followed. A snow fence would be temporary constructed about 100 feet to the northwest to protect the site from the USACE public trail. The fence and pre-existing grade would be re-established after the contaminated material was removed. The USACE representative agreed with the approach. He did ask that if there was any change from the existing plan that he be informed.
- A soil sample was taken of the recent excavated material to confirm the profile for the Wasco Landfill. The sample was prepared, packaged and shipped by START to. A five day turn-around was requested.

7/29/10 Wednesday

- EQM loaded and Dietrich Trucking transported 30 truck loads of material to the Wasco Landfill. The total tonnage was 962 tons.
- START monitored for particulates and ammonia down wind from the stock pile that the trucks were being loaded from near the entrance to the site. All constituents being monitored were below action levels.
- EQM removed the boundary, barbed wire fence between the site and USACE property. A temporary, semi-circle plastic construction fence (snow fence) was constructed approximately 100 feet to the NE of the boundary. The ends of the temporary fence were connected to the pre-existing barbed wire fence.
- EQM started to remove the top soil from the north east rim of the site. Water spray was used to control dust.
START monitored for particulates, ammonia and hydrogen cyanide. All constituents being monitored were below action levels.

2.2 Planning Section

2.2.1 Anticipated Activities

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

2.5.1 Safety Officer

Each morning a safety briefing is attended by all site personnel. Information from ERRS, EPA, USGG, and START personnel is reviewed. All personnel are given the opportunity to contribute any concerns or ask questions related to their own safety and safety expectations while onsite. A roster is maintained of all site personnel. Visitors, truck drivers delivering equipment, and other agency visitors must initially contact the ERRS PM before being allowed on site. Unless it is necessary, outside personnel are restricted to the support area.

The Ramco Aluminum removal to date has been a low hazard site with all work being done in level D. A strong emphasis has been placed on dust control by using a water tanker truck for the roadways and a manually held 1 1/2 hose to spray on soil being manipulated, whenever it is needed. START has been using monitors (ToxiRae II) for ammonia, hydrogen cyanide (HCN), volatile organics (Area Rae) and particulates (Data Ram 4) each day. There have been traces of ammonia with a peak reading of 40 ppm, but not for long enough duration to obtain any time weighted averages (TWA) approaching the NIOSH/REL of 25. No HCN has been detected with any of the monitors on site.

At least one Data Ram 4 (particulate monitor) and sometimes two are placed in downwind positions to confirm that no action level (1 mg/m³) of particulates are leaving the site. The Data Ram 4 also confirms that onsite personnel are also not being over exposed to particulates.

All personnel are wearing reflective vests, hardhats, steel toed boots while in the work area. When appropriate, some ground personnel managing the water hose are wearing sealed goggles to protect their eyes from dust being blown from the edges of the site or from work being done by heavy machinery in the immediate area. All personnel or teams have radios, including the heavy equipment operators. This allows personnel to communicate with each other and confirm that all personnel are not in a position of danger around the heavy machinery. Two track hoes and one D8 dozer are being used.

A USCG provided weather monitoring station with remote monitoring is placed in service each morning.

There have been no near misses or accidents on the Ramco site.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Cooperating Agencies include:

US Army Corps of Engineers, Portland District
Port of Klickitat, WA

4. Personnel On Site

EPA- OSC 1
USCG Strike Team - 1
START 7/26 -2, 7/27 -1, 7/28 -1
ERRS 6

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.