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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #4**
Progress
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/7/2010
Reporting Period: 8/5-7/2010

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

Period Covering August 5-7

8/5/10 Thursday

- ERRS brought on site a smaller Volvo 210 excavator with a cleaning bucket. This excavator is being used to do a final clean-up on the southeast portion of the removal area.
- Because the generator for the radial stacker is down for repairs, it was moved to the east, away from the screening plant. The screened material will be stockpiled using the end loader, until the stacker generator is repaired.
- After some adjustments, the screening plant is processing the soil. Large material discharged by the screening plant will be stockpiled for the crusher and is being evaluated for metal, K088 waste material or any other foreign objects that could damage the crusher.
- START and the USCG continued to monitor work and downwind areas for particulates, ammonia, and cyanide.
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8/6/10 Friday

- OSC Mike Boykin arrived on site and OSC Jeff Rodin left the site.
- ERRS loaded and a local sub-contractor transported 14 truck loads of material to the Wasco County Landfill. The material sent off site for disposal was from the stockpile of 1 inch minus from the screening plant. The total removed from the site for the day to Wasco County Landfill was 456 tons.
- ERRS continued to use the screening plant to process the soil, although issues with the feeder belt slowed the production rate.
- ERRS continued to screen oversized material from the screening plant for metal, K088 waste material, or other foreign objects.
- A hydraulic line on the 330 excavator broke, which caused ERRS to stop excavating soil from the removal area.
- ERRS continued to clean out the southeast corner of the removal area.
- START and the USCG continued to monitor work and downwind areas for particulates, ammonia, and cyanide.
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8/7/10 Saturday

- ERRS and an equipment subcontractor changed the feed belt on the screening plant to improve the production rate.
- ERRS continued to use the screening plant to process soil and continued to screen oversized material for metal, K088 waste material, or other foreign objects.
- ERRS continued to clean out the southeast corner of the removal area.
- START and the USCG continued to monitor work and downwind areas for particulates, ammonia, and cyanide.
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2.2 Planning Section

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, USCG, and START personnel is reviewed. All personnel are encouraged to voice any concerns or ask questions related to their own safety and safety expectations while on-site. 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 primary issues being reviewed each day are dust control, monitoring for ammonia, and protecting ground personnel as they use the water hose to control dust around the heavy equipment, and emergency procedure for the site.
Weather information and forecast is reviewed each morning by START and USCG.

All personnel are wearing reflective vests, hardhats, steel toe boots, and have radio communication when down in the removal area. The ground crew member handling the water hose has sealing goggles and have available dust masks. Hearing protection is also recommended and provided for personnel working near the screening plant.

With the setting up of the screening plant and the stockpiling of screened material near the entrance, the site is significantly more crowded. All personnel on the ground and operating equipment will need to be very alert to avoid potential accidents. With the loading of trucks and pups from the discharge stockpile, the work area will only become more congested. Ground crews must communicate with truck drivers and heavy equipment operators so that everyone maintains a high situational awareness. Ground crew members need to maintain eye contact with the drivers and operators when transitioning through work areas or have the drivers and operators temporary halt their activities during the transition. If ground crews are working with the operators, they need to be positioned so that they are always in view of the operators. Ground crew members need to be aware that as the excavators rotate, the operator may loose sight of crew members.

Air monitoring for particulates and ammonia continues. No detection levels have been above established action levels.

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

No information available at this time.

4. Personnel On Site

EPA OSC - 1
USCG Strike Team - 1
START - 1
ERRS - 7

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.