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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #5**
Progress
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/12/2010
Reporting Period: 8/8-11/2010

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 8-11

8/8/10 Sunday

- Some ERRS workers, the equipment subcontractor, and the USCG worked for a half day at the site to make additional adjustments to the feed belt on the screen plant so that full-speed production could resume on Monday.
-

8/9/10 Monday

- ERRS continued to screen waste material with the screen plant.
- ERRS continued to load screened waste into trucks. A total of 31 loads (1,006 tons) were sent off site to the Wasco County Landfill.
- USCG and START continued to monitor ambient air near the screen plant and at the downwind perimeter for particulates, ammonia, and cyanide.

8/10/10 Tuesday

- ERRS brought three additional workers and a haul truck on site, and they are being used to modify procedures for handling material generated from the screen plant. Rock (6-inch minus) from the screen plant is now loaded directly into the haul truck and then moved to a stockpile away from the screen plant. At the rock stock pile, ERRS removes pieces of metal and spent potliner from the rock. ERRS also brought in a full-time water truck driver to help keep dust levels down on the roads and in the work zone.
- ERRS continued to screen waste material with the screen plant.
- ERRS continued to load screened waste into trucks. A total of 39 loads (1,291 tons) were sent off site to the Wasco County Landfill.
- Representatives from the US Army Corps of Engineers visited the site to observe the removal action progress.
- USCG and START continued to monitor ambient air near the screen plant and at the downwind perimeter for particulates, ammonia, and cyanide.

8/11/10 Wednesday

- ERRS continued to screen waste material with the screen plant.
- ERRS continued to load screened waste into trucks. A total of 40 loads (1,296 tons) were sent off site to the Wasco County Landfill.
- USCG and START continued to monitor ambient air near the screen plant and at the downwind perimeter for particulates, ammonia, and cyanide.

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 members handling the water hose have sealing goggles and have available dust masks. Hearing protection is also required 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 has been one non-hazardous waste related injury on the site. The non-hazardous waste transport subcontractor driver fell at ground level while attempting to tarp the pup trailer following being loaded on site. As the driver continued to pull on the tarp draw lines the tarp suddenly freed itself and moved freely with the assistance of the wind. Due to the sudden movement the driver was caught off balance and fell flat on his back. The driver continued with the load but later determined that it was safer for him to stop running for the day. The driver did not go to the hospital and has taken no time off from work.

Due to a recently exposed patch of suspected dross the ammonia levels increased around the screen plant and stock pile. The readings did not constitute upgrade of respiratory protection, however some ERRS contractors decided to voluntarily upgrade for comfort reasons. It was also established that as a minimum while on the ground in the pit all personnel will wear a dust mask to minimize the ingestion of particulate in the air.

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 - 10

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.