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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #7**
Periodic
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/18/2010
Reporting Period: August 16-18, 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:**	7/26/2010
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

8/16/10 Monday

- ERRS main activity was to run the crusher to build up the stock pile of material to be loaded out to the Wasco County Landfill tomorrow.
- ERRS continued to sort through the rock stockpile (6" minus) that comes from the screening plant, for K088 materials, metal (steel and aluminum dross), which was segregated into separate piles. Site material that was under the screening feeder stockpile on the bottom/center of the pit produce elevated levels of ammonia vapors when exposed to the atmosphere and water. ERRS ground crew personnel working on the screening plant and at the separation rock pile were required to upgrade to level C. The action level for this decision is any peak reading of 50 ppm for ammonia or a TWA of 25 ppm for ammonia.
- USCG and START continued to monitor ambient air near the crusher, screening plant, around the ERRS crew working at the rock separating stockpile, and at the downwind perimeter boundary for particulates, ammonia, and cyanide.

8/17/10 Tuesday

- ERRS continued to sort through the rock stockpile for K088 materials and metals,(steel and aluminum dross), before the material is run through the crusher.
- ERRS did not operate the screen plant, but loaded out 17 truck loads for a daily total of 580.43 tons of non-hazardous waste from the screening plant discharge pile and sent to the Wasco County Landfill. ERRS aerated the screened material from Monday to allow the ammonia to dissipate before being loaded. START monitored around the screening stockpile to confirm that the loaded material would not present a health hazard or nuisance at 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.

8/18/10 Wednesday

- ERRS loaded out 34 truck loads for a daily total of 959.82 tons of non-hazardous waste from the screened waste pile and sent off site to the Wasco County Landfill. Total daily tonnage cannot be calculated yet due to 5 trucks not returning their weight tickets because of transit times from landfill.
- ERRS continued to sort through the rock waste stockpiles for K088 material and metal (steel and aluminum dross), which was segregated into separate piles.The endloader was used today with up to four ground crew personnel, which increase the volume of the output ready to be run through the crusher.
- ERRS operated the screening plant until mid-afternoon.
- ERRS excavated some of the material in the middle of the pit. The material was dozed up onto the screening plant feeder stock pile and through the screening plant.
- The excavated material had elevated levels of ammonia requiring ground personnel to upgrade to level C.
- ERRS started a crusher run in the afternoon.
- USCG and START continued to monitor ambient air for particulates, ammonia, and cyanide. Because of changing wind direction (now from the east), air monitoring stations were set-up at the west end of the main excavation pit and at the western perimeter of the site near the entrance and truck load-out areas.
- To date a total of 8018 tons of non-hazardous material has been shipped to the Wasco Co. landfill.

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

BACKGROUND INFORMATION:

The following are part of each morning's routine:

- Safety briefing with EPA/ERRS/START, with everyone signing the daily safety sheet.
- Topics reviewed are weather, air monitoring information related ammonia and particulates, heat

stress, coordination between ground crew and equipment operators, PPE for dust and ammonia.

- Emergency notification and procedures are reviewed on Monday of each week and/or when new personnel arrive on-site. .
- 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 or crusher.
- Truck driver coming on-site to load out for the Wasco County Landfill, stay in their trucks during the loading operation.
- USCG and START do continuous monitoring each day for ammonia and particulates as dictated by weather conditions on-site.
- A USCG provided weather monitoring station with remote monitoring is placed in service each morning.It was also established, as a minimum, while on the ground working on the crusher, rock separation screening pile or screening plant, all personnel will wear a dust mask to minimize the ingestion of particulate in the air. Eye protection is also required.
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OPERATIONAL PERIOD UPDATE:

A recently exposed patch of suspected dross has elevated ammonia levels. As this material is pushed into the feeder pile for the screening plant and as it is screen, the screening operator was up graded to level C.

- Two AreaRaes and a ToxiRae are used by START to closely monitor around the elevated ammonia area for worker protection.
- Ground personnel are also upgraded to level C based upon monitoring data.
- The action levels for level C respiratory protection is a peak of >50 ppm and/or a TWA of >25 ppm.

- Extreme heat was encounterd on site during August 16 & 17, With tmperatures reaching 104' F. All crews were encouraged to take extra breaks as needed, maintian hydration, and keep an extra watch on each other. Where practicle shade umbrellas were put in place for stationary workers.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

No information available at this time.

4. Personnel On Site

EPA OSC - 2
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.