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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #8**
Periodic
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/20/2010
Reporting Period: August 19-21, 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

8/19/10 Thursday

- 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 came from the screening plant, for K088 materials, metal (steel and aluminum dross), which was segregated into separate piles.
- USCG and START continued to monitor ambient air near the crusher, around the ERRS crew working at the rock separating stockpile, and at the downwind perimeter boundary for particulates, ammonia, and cyanide.

8/20/10 Friday

- 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. The ERRS crew completed going through the existing stockpile of rock. The separation operation was completed shortly before noon.
- ERRS ran the crusher for the majority of the day. The crusher run was trucked up to the screening discharge stockpile in preparation for loading out to the Wasco County Landfill.
- ERRS loaded out 28 truck loads for a daily total of 950.56 tons of non-hazardous waste from the screening plant discharge pile that was sent to the Wasco County Landfill. The cumulative amount to date of non-hazardous material transported to the Wasco County Landfill from the site is 8003.77 tons.
- In the middle of the afternoon, ERRS stopped running the crusher and started up the screening plant. ERRS ran the screening plant as well as excavated additional materials from the pit, for the remainder of the day.
- START monitored ambient air for particulates near the screened discharge stockpile and 50 yards downwind of the rock separation operations and crusher. The monitor was place that far from the operations to not interfere with the end loader moving the rocks to the separation area. START moved the monitoring instruments to more strategic locations when the screening plant was operational. Because of the additional excavation in the pit, some areas around the screening plant had elevated levels of ammonia >50 ppm. Ground crew members working in those areas were upgraded to level C respiratory protection.

8/21/10 Saturday

- ERRS operated the screening plant and screened material from the pit and the west wall. The material from the pit area still has elevated levels of ammonia as it comes in contact with the atmosphere and water. Ground crews upgraded to level C, based upon monitoring data.
- ERRS sorted through some material from the west wall for K088 waste and metal (steel and aluminum dross), with an excavator being used for the bigger pieces and by hand for the smaller pieces.
- ERRS stopped screening operations about mid-morning, because they ran out of pre-screening materials.
- ERRS continued to excavate the pit area to determine the extent of material that needed to be excavated, ERRS dug three test trenches 8-10 feet deep and 30-40 feet long. One trench was perpendicular to the long axis of the site. The first of the two trenches dug parallel to the axis of the site when from the crusher towards the middle of the pit. The second parallel trench went from the inlet of the screening plant towards the middle of the pit. The trenches reveled layers of aluminum dross and dirt. All three trenches had elevated level of ammonia >50 ppm requiring ground crew members to upgrade to level C. All this material in this area will need to be excavated and screened.
- USCG and START continued to monitor ambient air for particulates, ammonia, and cyanide. Because of changing operations and the way the wind eddies down into the operational area, monitors are move around the site to provide the best data for worker protection.

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, hard hats, 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. If the wind is severe, sealing goggles are used.
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OPERATIONAL PERIOD UPDATE:

A recently exposed patch of suspected Aluminum dross has elevated ammonia levels. As this material is excavated from the pit area, pushed into the feeder pile for the screening plant and as it is screen, the screening operator and ground crew members working near the plan 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.
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- The temperature for this operational period has been in the low 80's. With winds out of the west and northwest ranging from 15-25 mph with gust up to 35 mph, dust control with water from a tanker spray truck and two 1 1/2 hand hoselines are used frequently throughout the day.

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.