

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #9
Periodic
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/25/2010
Reporting Period: August 23-25, 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

8/23/10 Monday

- ERRS loaded out 31 truck loads of screened material for a total of 1033.35 tons of material transported to the Wasco County Landfill on this day.
- 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 were segregated into separate piles. A second ERRS crew was also separating material at the pre-screening stockpile. The material that is being separated at the pre-screening pile came from a stockpile that was on the NW wall of the pit. The stockpile was pushed up there by a previous contractor. This material had elevated levels of ammonia, but not >25 ppm. ERRS crew chose to be in level C respiratory protection for comfort from the ammonia and dust.
- ERRS RM escorted a vendor to inspect the aluminum material for possible re-cycling.
- At mid-day ERRS screened material for several hours until the all the pre-screened material was screened that had come from the NW wall stockpile.
- ERRS returned to moving material from the NW K088 stockpile to the pre-screening pile and separating it. ERRS had two separating crews working. There was some elevated ammonia levels, but no detection >25 ppm.
- USCG and START continued to monitor ambient air near the screener discharge pile and around the ERRS crews working to separate material for particulates and ammonia.

8/24/10 Tuesday

- ERRS loaded out 18 truck loads for a daily total of 606.76 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-regulated aluminum salt cake material transported to the Wasco County Landfill from the site is 10771.72 tons.
- ERRS continued to sort through the waste material for K088 materials and metals, (steel and aluminum dross) as it was transferred from the stockpile on the NW wall over to the pre-screening stockpile. The separation operation continued for most of the day.
- ERRS ran the screening plant intermittently during the day as the pre-screening pile would be built back up from the separation activity. The stock pile of waste material on the NW wall was completely removed and screened by the end of the day.
- START moved monitoring equipment around the site based upon ERRS activity to monitor for possible ammonia and particulates from the excavation of material from the NW wall, and the separation and screening operations. The ERRS ground crew members used level C because of the ammonia odor. However, the ammonia levels did not reach the action levels of >25 ppm TWA or a peak of >50 ppm.

8/25/10 Wednesday

- ERRS operated the crusher for majority of the day.
- ERRS moved the screening plant so that the waste material under the screening plant could be excavated. The excavation included material under the road going into the pit and extended up to approximately 100 yards short of the entrance fence. Backfill was used to establish a level area for the screening plant. The screening plant was moved back into the area.
- USCG and START continued to monitor ambient air for particulates and ammonia. The newly excavated area did not produce elevated levels of ammonia.

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:

- A safety briefing takes place each morning with EPA/ERRS/START and everyone signs the daily safety sheet.
- Topics reviewed are weather, air monitoring information related to 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 have access to sealing goggles and dust masks. Hearing protection is also required and provided for personnel working near the screening plant or crusher.
- Truck drivers 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 and operations 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 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.

OPERATIONAL PERIOD UPDATE:

- Two AreaRae and a ToxiRae are used by START to closely monitor around the site for elevated ammonia for worker protection. Two DataRam 4's are used to monitor particulates.
- Ground personnel are upgraded to level C based upon monitoring data. Several ERRS crew members chose to upgrade to level C respiratory protection during the separation activity for their comfort, but the levels of ammonia were below 25 ppm.
- The action levels for level C respiratory protection is a peak of >50 ppm and/or a TWA of >25 ppm.
- The temperatures for this operational period have been in the mid to upper 90's, making heat stress monitoring a priority.
- The winds have been light this operational period, making the removal area feel hotter. There is still a need for dust control, but it is moderate. The tanker spray truck is driven through the site once or twice per day. The two 1 1/2 inch hand hoses are used around the crusher and screening plant as appropriate.
- One minor near miss occurred when the water tanker was cautioned by radio, before it backed into the crusher discharge collection pit which is about 4 feet deep. No remedial action was needed. No injuries have occurred during this operational period.

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.