

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

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

To:
From: Jeffry Rodin, OSC
Date: 8/28/2010
Reporting Period: August 26-28, 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

8/26/10 Thursday

- ERRS loader out 25 loads for a total of 819 tons of non-regulated aluminum salt cake material transported to the Wasco County Landfill.
- ERRS re-positioned the screening plant and made the needed adjustments to start screening materials. Screened until mid-afternoon.
- ERRS brought in the contractor for the crusher to complete a welding repair on the bottom plates of the feeder shaker box.
- ERRS started crushing material at mid-afternoon and continued until the end of the 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).
- START continued to monitor ambient air near the crusher and around the ERRS crew working at the rock separating stockpile.

8/27/10 Friday

- ERRS loader out 30 loads for a total of 981.83 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill.
- ERRS ran the crusher for a short period in the morning, but stopped and started screening material to replenish the stockpile being loaded out. The screening plant was operated until noon.
- After lunch, ERRS operated the crusher for the rest of the day.
- ERRS continued to sort through the rock stockpile for K088 materials and metals, (steel and aluminum dross), that was produced from the screening plant operations in the morning.
- START monitored ambient air for particulates near the screened discharge stockpile and 25 yards downwind of the rock separation operations and crusher. START placed ammonia monitoring equipment next to the screening plant.

8/28/10 Saturday

- ERRS excavated additional material in the pit area near the pre-screening pile. The material was pushed up into the pre-screening area to be screened.
- ERRS screened for about two hours to re-plenish the screened stockpile with enough material to be loaded out on Monday. ERRS returned to running the crusher for the rest of the day.
- ERRS started to excavate backfill material from off the site to the east. A 1 1/2 hose line was used to control the dust.
- USCG and START continued to monitor ambient air for particulates and ammonia. The newly excavated material in the pit area did have elevated ammonia, but not >25 ppm. There were elevated levels of ammonia peaking at 38 ppm at the base screening discharge pile.

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 if there are elevated ammonia but not >25 ppm. No material will be loaded if the

ammonia level is >50 ppm.

- USCG and START do continuous monitoring each day for ammonia and particulates as dictated by weather conditions land 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.
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- Two AreaRaes and a ToxiRae are used by START to closely monitor around the the site for elevated ammonia for worker protection. Two DataRam 4's are used to monitor particulat
- Ground personnel are also upgraded to level C based upon monitoring data. Several ERRS crew members chose to wear level C 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 tanker spray truck is driven through the site once or twice per day. The two 1 1/2 hand hoses are used around the crusher and screening plant as appropriate.
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OPERATIONAL PERIOD UPDATE:

- High winds have increased the need for more water usage to control the dust this operational period. Winds at times have gusted to over 30 mph.
- As the work activity become more focused on the center of the removal area, the coordination between ground crew members and heavy equipment is a high priority.
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- The temperatures for this operational period have been in the mid to upper 80's and even as low as the 70's in the morning hours. This reduces the concern of heat stress for ERRS's crew members.

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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.