

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #11
Periodic
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 8/30/2010
Reporting Period: August 30-September 1, 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

8/30/10 Monday

- ERRS loaded out 21 loads for a total of 685.53 tons of non-regulated aluminum salt cake material transported to the Wasco County Landfill.
- ERRS and the sub-contractor moved the crusher out of the removal area and staged it just outside the entrance. The crusher was moved so the area under it could be excavated and the material pushed up into the pre-screening stockpile.
- ERRS screened material throughout most of the afternoon.
- ERRS excavated more dross material from the bottom of the pit and at the same time excavated to visually clean soil around the pit on the east side.
- START monitored ambient air near the base of the screening plant discharge stockpile, downwind from the pre-screening pile and excavation area just to the east of the pile.

8/31/10 Tuesday

- ERRS loaded out 32 loads for a total of 1062.15 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill.
- ERRS ran the screening plant all day.
- ERRS continued to sort through the rock stockpile being produced by the screening for K088 materials and metals,(steel and aluminum dross).
- START monitored ambient air for particulates and ammonia near the screened discharge stockpile and downwind of the rock separation operations. The ammonia content inside the boxes of two loaded trucks were taken to confirm that the trucks were not leaving the site with elevated ammonia > 25 ppm.

9/1/10 Wednesday

- ERRS loaded out 26 truck loads for a total of 851.44 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill. The cumulative tonnage to date removed from this site is 15172.41 tons.
- On the east end of the pit, ERRS excavated down to the bottom of the pit and found river rock that was level under the dross. The dross material was pushed up into the pre-screening area to be screened.
- ERRS excavated material, moving from the east end of the pit towards the screening plant, cleaning the walls of the pit as they moved back towards the screening plant.
- ERRS worked from the dross material while visually cleaning the wall and bottom of the pit.
- 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 of the screening discharge pile from material freshly screened in the morning. Ammonia levels dropped down as the material gets aerated during the screening process.

2.2 Planning Section

2.3 Logistics Section

Logistic arrangements are being managed and arranged by EPA contractors.

2.4 Finance Section

2.4.1 Narrative

The estimated project costs are:

Regional Removal Allowance Costs	
ERRS (Construction, equipment, and material)	1,500,000
Other Extramural Costs Not Funded from the Regional Allowance	
START	100,000
USCG Strike Team	10,000
Subtotal Extramural Costs and Contingency	1,610,000
Extramural Cost Contingency (20%)	322,000
TOTAL REMOVAL PROJECT CEILING	1,932,000

The total project ceiling, if approved, will be \$1,932,000. Of this amount, as much as \$1,800,000 comes from the Regional Removal Allowance

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,500,000.00	\$1,088,000.00	\$412,000.00	27.47%
USCG Strike Team	\$10,000.00	\$4,900.00	\$5,100.00	51.00%
START	\$100,000.00	\$44,000.00	\$56,000.00	56.00%
Intramural Costs				
USEPA - Direct & Indirect	\$743,000.00	\$5,000.00	\$738,000.00	99.33%
Total Site Costs				
	\$2,353,000.00	\$1,141,900.00	\$1,211,100.00	51.47%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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 >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 and ERRS 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.

- 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 particulates.
- Ground personnel are upgraded to level C based upon monitoring data. At times ERRS crew members may choose to wear level C during the separation activity for their comfort, even if 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 for dust control. Two 1 1/2 hand hoses are used around the crusher and screening plant as appropriate.

OPERATIONAL PERIOD UPDATE:

- Temperature for this operational period have been in the high 60's to 70's and some days of light rain. This made the for good working conditions.
- As the work activity becomes more focused on the center of the removal area, the coordination between ground crew members and heavy equipment is a high priority.
- The coordination between heavy equipment operators is a high priority as the removal area gets more congested.

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.

POLREP #11 Last Updated 5/30/2012