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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #13**
FINAL POLREP
RAMCO
10HF
Dallesport, WA
Latitude: 45.6253834 Longitude: -121.1312199

To:
From: Jeffry Rodin, OSC
Date: 9/8/2010
Reporting Period: September 6-13 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

9/6/10 Monday

- START continued to monitor ambient air for particulates.
- Crushing operations continued.
- Regrading continued along the Corps property perimeter to build up an access road to 3 of the site monitoring wells.
- ERRS continued to sort through the material removing K088, and aluminum metals from the non-hazardous waste stream.

9/7/10 Tuesday

- START continued to monitor ambient air for particulates.
- ERRS hand picked through the aluminum recycle pile pulling out rocks, K088, and other various materials prior to shipping 29.45 tons of recyclable Aluminum slag out.
- Crushing operations continued, and ERRS crew continue to pick K088, and metals out of the piles
- Regrading concluded along the Corps property perimeter to build up an access road to 3 of the site monitoring wells, and the original fence line was restored.
- START sampled three surrounding bodies of water, and the Port of Klickitat's community well.

9/8/10 Wednesday

- ERRS loaded out 26 loads for a total of 861.96 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill
- START continued to monitor ambient air for particulates.
- Crushing operations continued. ERRS crew continued to sort through the piles pulling out recyclable Aluminum slag, and K088.
- ERRS crews continued to work on restoration of area, and excavation of remaining material
- START sampled three perimeter monitoring wells.

9/9/10

- Crushing operations continued, ERRS crew continue to sort through pile picking out K088, and recyclable aluminum slag.
- START continued to monitor ambient air for particulates.
- Crews working in windy conditions with gusts up to 40mph.
- To date 17744.87 tons of on Aluminum Salt-cake material have been removed from the site.
- ERRS crews continued to work on restoration of area, and excavation of remaining material

9/10/10

- ERRS loaded out 21 loads for a total of 690.23 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill.
- ERRS continue excavation and restoration activities
- Waste container for K088 material was delivered.
- Partially loaded 32 Ton truck with Aluminum slag to be recycled
- START continued to monitor ambient air for particulates

9/11/10

- Finished loading 32 ton truck with approximately 48,000 pounds of Aluminum slag and shipped it off to recycling facility, atotal.
- A total of 96 tons of aluminum slag was sent off site for recycling. This will result in a return of approximately $15,000.
- ERRS continued excavation and restoration activities
- ERRS crew continued to demobilize and decontaminate site equipment
- ERRS crew worked on installing a permanent access gate and barrier.
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9/13/10

- ERRS loaded out 16 loads for a daily total of 535 tons of non-regulated aluminum salt cake material that was transported to the Wasco County Landfill.
- **The cumulative project total of 576 loads and 18,969 tons** of non-regulated aluminum salt cake.
- ERRS finished installing the access gated and security barrier

- ERRS finished up restoration activities
- All buildings and equipment are demobilized
- Two containers of K088 remain on site awaiting transportation to the waste disposal facility.

9/14/10
Two containers of K088 were with approximately 16 tons of waste were shipped off site.

2.2 Planning Section

2.3 Logistics Section

Logistic arrangements are being managed and arranged by EPA contractors.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

BACKGROUND SAFETY 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.
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- 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 comport, 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 hose lines are used around the crusher and screening plant as appropriate.
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- OPERATIONAL PERIOD UPDATE:
- Temperature for this operational period have been in the Low 60's and Mid 70's.
- 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.
- As the end of the job is insight, personnel are reminded to continue to be aware of the safety issues that they have been managing so well up to this point on the site.
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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 - 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.