U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Jorgensen-Forge Outfall Site (Boeing) - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #1**
Initial
Jorgensen-Forge Outfall Site (Boeing)
10JA
Seattle, WA
Latitude: 47.5302879 Longitude: -122.3064796

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From: Michael Sibley II, OSC
Date: 2/2/2011
Reporting Period: 01/24/2011- 02/11/2011

1. Introduction

1.1 Background

Site Number:	10JA	**Contract Number:**	EP-S7-06-02
D.O. Number:	N/A	**Action Memo Date:**	9/30/2010
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	N/A
Mobilization Date:	1/24/2011	**Start Date:**	2/2/2011
Demob Date:	3/31/2011	**Completion Date:**	3/31/2011
CERCLIS ID:	WAN0002329803	**RCRIS ID:**	N/A
ERNS No.:	N/A	**State Notification:**	N/A
FPN#:	N/A	**Reimbursable Account #:**	N/A

1.1.1 Incident Category

Time critical removal action.

1.1.2 Site Description

The Jorgensen Forge Outfall Site consists of two outfall pipes, a 24-inch and adjacent 15-inch, buried just south of the current Jorgensen Forge facility's northern boundary with the adjacent Boeing Plant 2 facility. Both pipes discharged into the Lower Duwamish Watershed (LDW). The LDW was listed on the National Priority List ("NPL") in September 2001 (CERCLIS No. WA0002329803). In 2002, the Washington Department of Ecology ("Ecology") added the LDW to the Hazardous Site List under Facility Site identification No. 42927743.

1.1.2.1 Location
The Site is located along the northern boundary of the adjacent Jorgensen and Plant 2 facilities. The street address is 8531 East Marginal Way South, Seattle, Washington, 98108. The approximate location of the east end of the 24-inch PLSD is 47° 31'37.82" North Latitude; 122° 18'13.59" West Longitude.

The Site and surrounding area are primarily industrial. The nearest school (Concord Elementary) is approximately 0.75 miles west-southwest. The closest residences are within a mile are to the west in the South Park neighborhood across the LDW.

1.1.2.2 Description of Threat

Numerous environmental investigations have documented the presence of PCBs in the PLSD pipes which discharge to the LDW. Total PCBs have been detected at concentrations as high as 10,000 mg/kg in a sample collected from the 24-inch PLSD. Multiple samples exceed both the MTCA cleanup level for industrial soil (10 mg/kg) and EPA Regional Screening Levels for industrial soil and the protection of groundwater (0.74 and 0.0088 mg/kg, respectively, for Aroclor 1254).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

01/31/2011

The morning kickoff meeting with all stakeholders took place at Jorgensen Forge. The workplan was discussed and coordination needs between the two PRPs, their consultants, contractors and subcontractors was reviewed. There was agreement with the work plan to first complete the sealing of the public storm water connections to the 24 inch pipe from East Marginal Way. The next step would be to excavate the corrugated metal Pipe(CMP)/concrete transition so that it can be sealed. Risers will be placed on the 24 and 15 inch pipes at this distal end to be used for access to the vacuum truck. After both ends have been sealed, work will be done section by section to clean and seal the pipes. This work is expected to extend into next week.

The Jorgensen Forge representative discussed site security and how proper identification would be managed with the plant's front gate. He also reviewed areas within the plant yards and buildings that were off-limits to removal site personnel.

After the meeting several of the parties did a site walk through to assist in planning for the placement of de-watering tanks and solid collection roll-off boxes, but still not interfere with Jorgensen Forge's day to day operations.

02/3/2011

A PRP Sub-contractor crew member made a confined space entry into a manhole just outside the Jorgensen Forge fence on East Marginal Way to seal the 24-inch clay storm water drainage pipe from East Marginal Way. (see figure #3) This stops any additional water from entering into the 24-inch pipe that transverses the Jorgensen Forge property to the Duwamish River.

02/4/2011:

The PRP's heavy equipment subcontractor crew excavated down to the 24-inch vitrified clay pipe at the transition of the corrugated metal pipe and the clay pipe. One 3 foot section of the clay pipe was removed and disposed of in the solids roll off box. Placed inside the up stream end of the pipe was a 12-inch, PVC 90 degree and grout/controlled density fill (CDF) was used to seal the pipe around the 12-inch PVC. A riser was connected to the 90 degree PVC to be used as a clean out.
On the down stream end of the 24-inch pipe an inflatable marine buoy was inserted and inflated to seal the pipe. CDF was placed inside the pipe up against the buoy to complete the seal. Additional CDF was poured into the excavation to fill up around both sealed ends of the 24-inch clay pipe. The excavation hole was covered with visqueen for the night to allow the CDF to dry completely.

02/07/2011:

The PRPs heavy equipment subcontractor crew backfilled the excavation site for the 24 inch pipe that was done the Friday before. The crew than excavated down to the 12-inch (not 15-inch as identified in some historical documentation) vitrified clay pipe at the transition of the corrugated metal pipe and the clay pipe. One section of the clay pipe was removed and disposed of in the solids roll off box. Placed on the 12-inch, up stream end of the pipe with a rubber adapter and clamps was a 12-inch, PVC 90 degree. A riser was connected to the 90 degree PVC to be used as a clean out.
On the down stream end of the 12-inch pipe an inflatable marine buoy was inserted and inflated to seal the pipe. CDF was placed inside the pipe up against the buoy to complete the seal. Additional CDF was poured into the excavation to fill up around both sealed ends of the 12-inch clay pipe. The excavation hole was covered with visqueen for the night to allow the CDF to dry completely.

The pipe cleaning contractor cleaned out the solids from manhole SDMH 37-2 to SDMH 11 (see figure #3). SDMH 11 is the manhole just outside the Jorgensen Forge (JF) fence near East Marginal Way. SDMH 37-2 is the first manhole down gradient on the 24-inch pipe. The jet cleaning nozzle was run though the 24-inch pipe four times while the water and solids were being vacuumed by a vac truck. After each run the vac truck would dump the water and suspended solids into the dewatering system onsite.

The pipe cleaning contractor's remote camera crew ran a remote camera dolly through the section of pipe from SDMH 37-2 to SDMH 11 to inspect it. START observed the inspection on the video screen in the camera truck. The consults for both RPs also observed the video inspection. While there was a significant improvement from the pre-cleaning video inspection, there was still a significant amount of solids on the bottom of the pipe in about half of the section of pipe near SDMH 37-2. It was recommended that it be clean again until the solids were removed.

02/08/2011:

The RP heavy equipment contractor crew backfilled the excavation site for the 24-inch pipe that was done the day before and cleaned up the area.

The pipe cleaning crew ran the clean-out nozzle through the section of 24-inch pipe from SDMH 37-2 to SDMH 11 two more times. They than moved west to manhole SDMH 24B and started to clean up-stream (towards East Marginal Way) from that manhole access. At this point the volume of water and solids accumulated was more than the dewatering system could handle. The contractor stopped the cleaning operation and focused on resolving the dewatering system limitation.

The pipe cleaning contractor camera truck set up at SDMH 37-2 and inspected the section of 24-inch pipe east to SDMH 11 with the remote camera dolly. START, along with the consultants for the PRPs observed the inspection on the video screen in the camera truck. The section looked acceptable. Because of the amount of water still in the bottom of the pipe, it was agreed that the water needed to be removed so the amount of solids remaining, if any, could be evaluated before accepting this section as cleaned.

02/09/2011:

To help control water infiltration from the down stream portion of the 24-inch pipe, a temporary inflatable seal was placed in the down stream 24-inch pipe at manhole SDMH 24B. The section of the 24-inch pipe up stream of manhole SDMH 24B to the public manhole SDMH 11 near East Marginal Way was video inspected. The video inspection revealed some area in the pipe with remaining solids and that there was water infiltration coming into manhole SDMH 11 just below the up stream seal thru the wall of the manhole.

The remainder of the day was spent cleaning and removing water from the section of the 24-inch pipe down stream of manhole SDMH 24B. The de-watering system onsite is functioning to the level that the residual water is being re-cycled to clean the pipe, eliminating the need to use fresh water from the public water system.

02/10/2011:

A morning meeting between the EPA/OSC and the other stakeholders was held onsite to discuss and get agreement on three modification to the workplan. These modifications were needed due to the discovery of additional pipe laterals on the 24-inch clay pipe not identified in earlier video inspections.

A temporary inflatable plug was placed on the 24-inch pipe at manhole SDMH 11 to isolate the 24-inch clay pipe from SDMH 11 to SDMH 24B. This was done to assist the removal of the water in the 24-inch pipe so that it can be properly video inspected tomorrow.

02/11/2011:

The 24-inch clay pipe was jet washed cleaned several times again from manhole SDMH 37-2 to SDMH 11 and from SDMH 37-2 to SDMH 24B. The cleanings were successful in removing the debris from the 24-inch pipe. This was confirmed by video inspection. This 24-inch pipe section was video re-inspected after the 15-inch clay pipe lateral that extended out of SDMH 37-7 to the northeast was jet washed cleaned. The video inspection of the 15-inch confirmed that it was debrided and SDMH 37-7 was ready to be sealed.

2.1.2 Response Actions to Date

None.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

None.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

Completion of storm pipe cleaning
Sealing of remaining manholes
Dewatering of Soil Bins

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

See operations section.

2.2.2 Issues

After completing video surveys of the 24" storm line, additional 4" lateral was found. Large debrie was found in the 15" lateral. Will need to modificy work plan & address changes.

2.3 Logistics Section

02/01/2011

Orange construction fencing was erected to delineate the work area for the CMP/concrete transition area. The fence would also assist in separating the facility work yard area from the removal and excavation work areas.

02/02/2011

Near where the CMP/clay transition area will be excavated, one double walled de-watering trailer was set and one open roll-off box was position next to the trailer inside a spill liner. Two additional roll-off boxes with lids were also set inside double lined secondary containment just to the east of the dewatering trailer. The western box will be part of the dewatering system and the easter box will be used for solid waste.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Background:

All consultants, contractors, and sub-contractor personnel coming onto the facility attended a video heath and safety presentation and completed a safety checklist. This was done to ensure that everyone was familiar with the health and safety requirements of the facility while working on the property.

Additional morning safety briefings were conducted each day to address the specific hazards and procedures for the work to be completed that day.

2.6 Liaison Officer

N/A

2.7 Information Officer

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

WDOE
City of Tukwila
King County Airport
EPA RCRA
EPA Remedial Program

4. Personnel On Site

Facility Environmental Consultant - 1
PRP Environmental Consultant - 1
START - 1
PRP Environmental Contractor - 3
PRP Cleanup Subcontractor - 3
EPA - 1

5. Definition of Terms

CMP: Corrugated Metal Pipe
CDF: Controlled Density Fill

6. Additional sources of information

6.1 Internet location of additional information/report

None.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 6/23/2011