

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Milwaukee Roundhouse - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: **POLREP #1**
Initial POLREP - Milwaukee Roundhouse
Milwaukee Roundhouse
Z8DP
Deer Lodge, MT
Latitude: 46.3912568 Longitude: -112.7407551

To:
From: Craig Myers, OSC
Date: 4/4/2011
Reporting Period:

1. Introduction

1.1 Background

Site Number:	Z8DP	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E11802	Reimbursable Account #:	HR 08L0XDP 302D91C Z8DP

1.1.1 Incident Category

OPA Preliminary Assessment

1.1.2 Site Description

This site was discovered while EPA was investigating the Milwaukee Railroad site in Deer Lodge, MT. The Brownfield program has been involved on this site for several years, but never contacted the Emergency Response Unit. While discussing the Milwaukee Railroad site with a representative from Montana Department of Environmental Quality, the OSC discovered that a buried Bunker C oil tank still existed on the site and was suspected to be leaking. The tank was used to fuel the oil-fired converted steam locomotives on the Milwaukee line in the early 1900s. Milwaukee Railroad went bankrupt in the mid 1980's, the property now belongs to Powell County.

1.1.2.1 Location

The Site is located at N 46.3912568, W 112.7407551, or adjacent to the Clark Fork River at the north end of College Drive in Deer Lodge, MT.

1.1.2.2 Description of Threat

There is a buried concrete tank (40 feet by 40 feet by 5 feet deep) situated approximately 100 feet from Tin Cup Joe Creek, a perennial stream tributary to the Clark Fork River. The tank is obviously leaking - see the next section for details - and has impacted the surface and subsurface of the adjoining shoreline of Tin Cup Joe Creek. The confluence of Tin Cup Joe and the Clark Fork is approximately one half mile down stream from the site. The presence of the Bunker C oil on the banks of Tin Cup Joe Creek is a discharge under 40 CFR 110.3(b).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Upon receiving notification that the tank was still present and was likely leaking, the OSC mobilized the START contractor from the Milwaukee Railroad site across the river to conduct a quick site inspection. The OSC observed a series of old monitoring wells in the vicinity of the tank. Upon opening the wells, pure Bunker C product was observed in all three, the depth was not able to be quantified due to the low

temperatures and subsequent viscosity of the oil. Further, the OSC observed staining on the bank of Tin Cup Joe creek. The stained area had the appearance of asphalt, however a Powell County representative informed the OSC that, during the summer, while it looks like it would support weight, "you sink right in".

The tank reportedly caught fire in the mid 1980s, and the fire department smothered the fire by using a locally available bulldozer to push any available soil and debris into the top of the tank - it originally had a wooden top that was flush, or nearly so, with the ground surface. The tank then supposedly discharged some of it's contents to the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

No OSC-sanctioned actions have taken place to date with respect to oil removal. As mentioned earlier in this report, Powell County has been participating in a Brownfield clean up activity, however their efforts have mainly focused on lead and arsenic contamination on other areas of the site due to the roundhouse operations. Powell County has also obtained grant funding from Montana's Department of Natural Resource Conservation (DNRC) to conduct cleanup operations on the site. A significant amount of funding has gone into assessment of the site, and the OSC has discovered that the County's Consultant has known that the tank was present for several years. Last summer, the consultant conducted a removal to consolidate lead contaminated soils on site and to remove some Bunker C contaminated streamside soils at the furthest downstream extent of the contamination along Tin Cup Joe Creek, but made no attempt to remove the source of the discharge, so it is very likely that at least some of the excavation along Tin Cup Joe Creek will have to be re-done.

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

Powell County is the only currently solvent RP to the OSC's knowledge, however, they may be exempt from liability due to their status as a sovereign entity. It is currently unknown as to how they acquired the property.

2.2 Planning Section

2.2.1 Anticipated Activities

The tank will be emptied of all debris and soil, remaining product - if any - will be recovered and recycled. All saturated soils will be removed. Given the apparent extent of contamination, this will likely require temporarily redirecting Tin Cup Joe Creek into a pipe to facilitate excavation. The OSC will attempt to minimize disposal costs for the soil by sending it off to a fuel blender for energy recovery.

2.2.2 Issues

Powell County does not have the resources to conduct this action, either organically or via DNRC grants. The DNRC grant cycle runs on something that approximates the federal fiscal cycle, and as such, no additional funding will become available until well into the next fiscal year, if at all. Oil Response funding will need to be acquired from EPA HQ to facilitate this removal, as the region does not have enough funding available to conduct the estimated \$240,000 removal.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

N/A

2.6 Liaison Officer

N/A

2.7 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

N/A

4. Personnel On Site

N/A

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be found at <http://www.epaossc.org/MilwaukeeRoundhouse>.

6.2 Reporting Schedule

The next report will be filed when site conditions warrant - most likely when the tank has been removed.

7. Situational Reference Materials

No information available at this time.