

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: POLREP #2
Progress POLREP
Milwaukee Roundhouse
Z8DP
Deer Lodge, MT
Latitude: 46.3912568 Longitude: -112.7407551

To:
From: Craig Myers, OSC
Date: 6/17/2011
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 Brownfields/Assessment Unit has been involved with 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 1980s, 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 (120 feet by 70 feet by 8 feet deep - volume updated to reflect actual size) 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 wells; the depth was not able to be quantified due to the low temperatures and resulting 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 - anecdotal reports vary from the 1930s to the 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 into the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

ERRS crews have excavated all material from the tank and have begun to excavate soils surrounding the tank. Excavated soil is being characterized for lead contamination and total petroleum hydrocarbons for disposal at the Butte Silver Bow landfill in Butte, MT, 40 road miles South East of the site.

Due to the tank's current open top nature, water has accumulated in the tank over time. This necessitated the dewatering of the soils inside the tank during removal. The OSC constructed a water treatment system consisting of a field built oil water separator and, at the State of Montana's request, a percolation bed of activated carbon. The State's request was based upon the fact that there has been Vinyl Chloride found in shallow groundwater wells on the site and they have not located the source at this time. The treated water is being discharged into Tin Cup Joe Creek under the OSC's discharge authority in 40 CFR 122.3(d), but is being periodically sampled and analyzed for BTEX and halogenated solvents to check for breakthrough on the carbon. Photos of this system can be seen on the website listed in the Additional Sources of Information Section.

As excavation has continued, heavy rains in the area have caused Tin Cup Joe Creek to nearly top it's banks and flow into the excavation area. This has also caused the shallow ground water level to rise. In order to maximize removal of the Bunker C laden soils on the river bank, the aforementioned water treatment system is also being used to assist in management of groundwater around the immediate area of excavation as veins of Bunker C product are pursued below the elevated shallow groundwater table to the extent possible.

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

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

2.1.4 Progress Metrics

All soils are being transported to Butte Silver Bow landfill for disposal. All oil recovered in the oil/water separator will be recycled with a local oil recycler. Disposition of the water treatment system carbon is yet to be determined.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Treatment</i>	<i>Disposal</i>
Contaminated Soil	Soil	3,400 tons	None	Butte Silver Bow
Recovered Oil	Oil	Unknown	None	Will be recycled

2.2 Planning Section

2.2.1 Anticipated Activities

Excavation activities will continue and are expected to conclude in approximately 2 weeks depending on the extent of product migration parallel to and beneath Tin Cup Joe Creek.

Transportation and disposal activities are expected to continue through June 30th.

Backfill and reclamation activities are expected to begin as soon as practicable, and should be completed by mid-July.

2.2.2 Issues

Disposal costs of the excavated material have caused the site budget to nearly double. Approximately 70-90% of the materials being excavated as part of this removal action are suitable for re-use as a roadbase for paved roads. Some of the material does have slightly elevated levels of lead; however, there has only been one TCLP failure of all samples taken on the site to date. It should be noted here that the lead is present in an overburden layer of fill that was pushed into the tank by the fire department to snuff a fire, as discussed earlier in this report, at levels that do not pose an immediate health risk and is not in any way driving the OSC's removal action - the fill must be removed as part of the tank removal and to access the oil that is threatening Tin Cup Joe Creek. Given that the proposed reuse of this material was also going to be capped with an asphalt cap in the form of a road, any leachability would be further reduced. However, the MDEQ will not consider any variances on air permits issued to any of the local paving companies to allow the

waste to be reused. This is contrary to the analytical results, and is resulting in nearly \$300,000 in extra costs to the OSTLF, with no direct environmental benefit and, arguably, with detrimental environmental effects in the form of 10,000 cubic yards of waste being needlessly landfilled.

Additionally, this site is on MDEQ's CECRA list as a high priority site. The Montana Superfund program - as part of work ongoing on the Clark Fork Superfund (NPL) Site - has obtained and developed a borrow site for clean fill material. When asked by the OSC, the State RPM agreed (pending management approval) that EPA could use the fill material if we excavated and transported it ourselves. MDEQ management denied the request, citing that the State of Montana is not legally allowed to "give away" state resources. If this were truly a partnership to clean up the site, MDEQ could interpret this action as contributing the cleanup of a high priority site, not as "giving away state resources". The State's position on this matter is also adding costs to the cleanup by forcing the purchase of locally sourced fill material. These costs will probably be in the range of \$50,000 to \$80,000, depending on the final excavation volume and required backfill elevation to properly regrade the Tin Cup Joe shoreline.

All of the above is contrary to the NCP (40 CFR 300.115). This provision contemplates and/or describes the state's obligation as a member of the RRT to contribute resources to, and to assist with, a cleanup when requested by the OSC.

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

1 EPA OSC
1 USCG Pacific Strike Team Member
2 URS Operating Services (START3)
14 Environmental Restoration (ERRS)

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.epaosc.org/MilwaukeeRoundhouse>.

6.2 Reporting Schedule

The next report will be filed when site conditions warrant.

7. Situational Reference Materials

No information available at this time.