

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #5
Final POLREP Phase 1 Removal
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Jeffrey Fowlow, OSC
Date: 4/9/2012
Reporting Period: March 2010-April 2012

1. Introduction

1.1 Background

Site Number:	10HD	Contract Number:	
D.O. Number:		Action Memo Date:	9/6/2009
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/12/2009	Start Date:	10/13/2009
Demob Date:	4/13/2012	Completion Date:	
CERCLIS ID:	WAN001002813	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility.

1.1.2 Site Description

See POLREP 1.

1.1.2.1 Location

1.1.2.2 Description of Threat

This POLREP focuses on the removal of the (then estimated) 50 drums staged at various locations throughout the site. Many of the drums were thought to have been generated during the shut down of the metal salvaging operations and abandoned. The drums contained waste oil, other fuels, waste oil-contaminated debris, and unknowns. The drums were in poor condition, unlabeled, and exposed to the elements. Evidence of leaking or spills were observed in the adjacent surface soil.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP 1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An Action Memorandum was approved on September 6, 2009. Phase 1 of the removal, addressing surface hazardous waste issues, including the characterization and removal of drums of hazardous waste, excavation and removal of lead-contaminated surface soils, and removal of friable asbestos containing material, was completed on October 23, 2009. Known remaining contamination at the site includes surface and subsurface soils with high concentrations (above residential land-use screening levels) of PCBs, SVOCs and various metals. The contaminated area is underneath and downgradient of the main materials processing area, where heavy hydraulic equipment (including a large metals shredder and bailer) has been observed to be leaking, and has reportedly been leaking for 30 years. The conceptual site model for this area is that the equipment has been leaking hydraulic fluid more or less continually for 30 years, and that there have reportedly been other larger releases from the hydraulic oil storage tank utilized by the equipment. It has also been reported that various used oils, including potentially PCB contaminated transformer oils, have been used in the equipment. As a result, the soils in the area and extending north

towards Mill Creek appear to be oil saturated. Analytical data from geoprobe samples collected in September, 2009 show high concentrations of PCBs and SVOCs and some metals up to 8 foot depth.

The final step of this Removal Action was initiated with the approval of the 12-Month Exemption, Change in Scope, and Ceiling Increase Amendment to the Action Memorandum dated April 3, 2012. This Amendment funded the removal and disposal of approximately fifty 55-gallon drums that were likely generated and abandoned during the cessation of salvaging operations at the site in 2010.

2.1.2 Response Actions to Date (for reporting period)

Field operation for this final reporting period began on Monday, April 9 and lasted through Friday, April 13, 2012. When EPA and contractors arrived on site, the number of drums increased from approximately 50 to approximately 60. Also the labeling affixed to the drums by a contractor retained by the operators of Stubblefield Salvage had faded or disintegrated due to age and exposure to the elements. Because most of the labels were illegible or missing, START sampled and performed modified hazard categorization analysis to help the ERRS contractor assign waste category.

On **Tuesday, April 10 and Wednesday, April 11**, ERRS consolidated and overpacked drums in to steel salvage drums and staged the wastes into waste streams. ERRS also surveyed the other areas of the site and recovered drums of oily soil and waste liquid from a number of places. In total, approximately 65 drums of oily liquid and solid waste were recovered and, when possible, bulked into the steel salvage drums. One 300-gallon polyethylene container of pesticide/herbicide also was emptied into 6 salvage drums and staged for disposal. Once the containers were emptied of waste, ERRS used an excavator buck to crush the containers. Once the drums were removed from the storage areas, ERRS used an excavator to scrape areas of obviously contaminated soil. Excavated soil, crushed drums, and Investigation Derived Waste (PPE, etc) was disposed in a 20 yard roll off container.

ERRS also picked up and prepared for disposal 5 drums of purge water from monitoring well installation and decontamination water from previous EPA investigations. A total of 7 drums of soil cuttings generated during monitoring well installation were emptied of content into the 20 yard roll off bin and crushed.

On **Thursday, April 12**, a total of 61 drums, representing 6 waste streams was loaded onto a truck bound for the US Ecology disposal facility in Grandview, Idaho.

Also on Thursday, April 12, EPA directed ERRS to use the excavator to remove brush and debris from a wooded swale area in the northwest corner of the property near the former processing area. EPA and START had previously observed drums in this area and samples collected during the removal assessment had shown elevated concentrations of site contaminants to be present. It was obvious that this area had received lots of waste and debris in the past. ERRS removed dozens of tires and dozens more were left behind. ERRS also recovered scrap metal, household trash, and other debris. A total of five 55-gallon drums were recovered. All of the drums were without significant content, EPA directed START to collect two composite samples from distinct areas of the swale.

On **Friday, April 13, 2012**, the 20 yard roll off container with non-RCRA debris was transported off site for disposal. All EPA, ERRS, and START personnel demobilized.

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

Identified PRPs include Stubblefield Salvage and Recycling, LLC, as well as its owners and officers. Phase 1 removal activities (2009) and the drum removal (2012) at the site were conducted as EPA Fund-lead. It is anticipated that EPA will attempt to negotiate a consent agreement with PRP(s) for necessary Phase 2 cleanup of contaminated soils in the source area.

2.1.4 Progress Metrics

From Phase 1 (2009) and Drum (2012) removal:

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-RCRA lead soils	Soils	75 cy			
Asbestos waste	Soils	150 cy			
PCB oils and sludge		7 drums			
PCB oils and water		11 drums			
Non-TSCA PCB debris		40 cy			
Paint related material		3 drums			
Malathion (2012)	Liquid	6 drums			
Waste Flam. Liquid (2012)	Liquid	6 drums			
Waste oil with lead (2012)	Liquid	18 drums			

Waste oil (2012)	Liquid	13 drums			
Haz Waste Liquid (nos) (2012)	Liquid	10 drums			
Haz Waste Solid (nos) (2012)	Solid	8 drums			
Non-RCRA solid waste	Solid	20 cy			

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will send a letter to PRP(s) inviting them to enter negotiations for a consent agreement to implement Phase 2 removal activities, to excavate and remove contaminated soils in the source area necessary to protect public health and the environment.

2.2.1.1 Planned Response Activities

This removal action has been completed..

2.2.1.2 Next Steps

EPA will conduct an Engineering Evaluation/Cost Analysis (EE/CA) to evaluate the potential action (Phase 2) of contaminated soils in the processing area. The EE/CA is anticipated to be completed by the end of summer 2012 and the potential removal action could begin in fall 2012.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

For the April 2012 drum removal action:

EPA - 1
ERRS - 4
START - 2

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.