

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #6
Initial POLREP Stubblefield Soil Removal
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Jeffrey Fowlow, OSC
Date: 5/16/2013
Reporting Period: May 13 to May 18, 2013

1. Introduction

1.1 Background

Site Number:	10HD	Contract Number:	
D.O. Number:		Action Memo Date:	5/2/2013
Response Authority:	CERCLA	Response Type:	Non-Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/13/2013	Start Date:	5/13/2013
Demob Date:		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

1.1.2.1 Location

The Site is located at 980 NE Myra Road in Walla Walla, Walla Walla County, Washington (46.0646 latitude and -118.3689 longitude). The Site is 11 acres in size and is a former metals salvage and recycling business. The main salvaging operation consisted of a large hydraulic shear used to cut up scrap metal and a large press to compress it into blocks. An abandoned three-story wooden building, which had been used as a rendering plant, is adjacent to the shear and press. Piles of metal scrap cover most of the rest of the Site.

The Site borders Mill Creek to the north, Myra Road to the west, agricultural land to the east, and a single residence to the south. Population within 1/4 mile of the Site is 102.

Stubblefield Salvage and Recycling, LLC (SS&R), has operated at the Site since the 1960s. Historically, the SS&R property occupied a footprint of approximately 40 acres on the outskirts of Walla Walla. Sometime around 1995, the western half of the 40 acres was sold to the City of Walla Walla, who built a waste water treatment plant at that location. EPA is informed that the scrap material that was on the surface of the now City-owned property was pushed to the eastern area of property still owned by SS&R. Prior to 2007, the SS&R-owned property was approximately 22 acres. In the Fall of 2008, the SS&R property was halved again – the west half of the property was sold and all of the scrap material (that was on the surface, at least) on the west half of the property was pushed over to the east half of the property. Presently, a county road (Myra Road) bisects (north/south) at about the middle of the historical SS&R property. The property to the west of Myra Road and east of the waste water treatment plant was reportedly sold to a developer. All of the processing of scrap metal at the Site, including operation of the hydraulic shear and compactor, and the smelter, has reportedly historically always taken place at its present location, within the footprint of the current 11-acre Site. The property that was sold was reportedly used only for storage of scrap metal.

1.1.2.2 Description of Threat

This removal action focuses on the removal of the contaminated soil in the Process Area. The

contaminants of concern include PCBs, metals, SVOCs, pesticides, and petroleum hydrocarbons at concentrations exceeding Regional Screening Levels and/or MTCA standards. A total of approximately 7,700 cy of contaminated soil exists in the Process Area. The contaminated soils present a threat to human health and the environment through direct contact or ingestion from potential future site workers, and the contaminated soil presents a threat to groundwater through infiltration.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA performed Removal Site Evaluations and other field investigations from May 2009 to April 2012. Seven field events were performed during this period to characterize the nature and extent of soil and groundwater contamination at the site. In the Process Area, 25 boreholes were installed for the collection of soil and groundwater samples. A total of 45 soil and 12 groundwater samples were collected and submitted for laboratory analysis. Analytical results indicated the presence of PCBs, SVOCs, metals, and petroleum hydrocarbons at concentrations exceeding RSLs in soil and groundwater. More detailed information is provided in the RSE report and the EE/CA available on the site's website.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An Action Memorandum for this removal was approved on May 2, 2013. This removal action addresses the contaminated surface and subsurface soil located in the Process Area. The conceptual site model for this area is that the hydraulic equipment, used for shredding and baling scrap metal, 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.

2.1.2 Response Actions to Date (for reporting period)

Field operation for this reporting period began on Monday, May 13 and lasted through Saturday, May 18, 2013. ERRS conducted dust-control activities every day unless it was raining and START performed dust monitoring every day using Data Rams with continual monitoring via Viper. Dust control measures worked well during this reporting period as visible dust was not generated and measurements from the Data Rams did not exceed site respirable dust action levels (2.5 mg/m³). Each day following excavation or truck load out, ERRS has washed Myra Road at the site entrance to remove residual soil tracked on tires.

Monday, May 13: EPA and ERRS and START contractors mobilized to the site and received and set up equipment, trailers, and conducted other site preparation activities.

Tuesday, May 14: ERRS cleared and compacted the backfill storage repository, reconstructed the access roads onto the site by laying and compacting gravel, and constructed a truck decon pad. ERRS also picked up and double bagged approximately 250 lbs of cement-asbestos board (CAB) that was found in 1 square foot and larger pieces located on the side of the shop building. ERRS also excavated two exploratory test pits to enable STARTs to collect samples. START collected CAB and soil samples to submit to the analytical laboratory. START also located and marked reference points (former sample points, monitoring wells, test pit locations, etc.) on the site to alert ERRS to site features.

Wednesday, May 15: ERRS began receiving and stockpiling material to be used to backfill the excavation of the Process Area. ERRS also concluded excavation of test pits from which soil samples were collected by START. ERRS also excavated the "P203 hot spot" of contaminated soil located on the upland area of the site. START collected confirmation samples from the P203 hot spot and collected a sample to the material to be used to backfill the excavation when it is completed. START processed and submitted the test pit soil samples, backfill soil sample, and a sample of the CAB for laboratory analysis. Excavation of the South Process Area (SPA) began in the southwest corner. Approximately 600 tons of soil were excavated and stockpiled on site awaiting off-site disposal.

Thursday, May 16: ERRS excavated approximately 400 tons (approximately 1,000 tons cumulative to date) of soil from the SPA. The soil was stockpiled on site while awaiting off-site disposal. While excavating the soil in the SPA, oil was observed floating on the groundwater. ERRS deployed oil-absorbent pads and boom to corral and remove as much oil as possible. START collected groundwater samples from the four on-site monitoring wells.

Friday, May 17: ERRS excavated approximately 300 tons (approximately 1,300 total cumulative to date) of soil from the SPA. The soil was stockpiled on site while awaiting disposal (scheduled to begin Monday, May 20). Oil continues to leach from soil into the excavation. Absorbent pads are continually deployed and collected and are doing a good job of removing the oil from the surface or the water. The remainder of the sheet pile retaining wall, which separates the upland part of the site from the Process Area, was removed.

Saturday, May 18: ERRS excavated approximately 350 tons (approximately 1,650 tons cumulative to date) of soil from the SPA. The soil was stockpiled on site while awaiting off-site disposal. Oil leached from soil into the excavation and was collected by ERRS using absorbent pads. An estimated 100 gallons of oil has been recovered thus far from the excavation. The excavation of contaminated soil from around the shop building was completed, backfilled, and compacted without structural damage to the structure. START and ERRS collected and assessed 6 compressed gas cylinders. Four of the cylinders contained flammable gas, 1 was empty, and 1 has a stuck/corroded valve and will be assessed and disposed of by a gas products vendor.

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. The Stubblefield Soil Removal Action is conducted as an EPA Fund-lead removal. Access to the property was granted to EPA by the Personal Representative of the Estate of Emory Stubblefield.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA will continue to excavate and remove contaminated soil from the Processing Area. Contaminated soil will be transported off site for disposal beginning next week (May 20-26). EPA will continue to remove as much oil from the groundwater as possible prior to beginning to backfill the excavation.

2.2.1.2 Next Steps

2.2.2 Issues

While excavating on Friday, May 17, ERRS broke a 12" concrete pipe, extending east-west through the Process Area. There were no liquids or other materials in the pipe. ERRS contacted the City of Walla Walla who arrived and performed an inspection of the pipe. The City's engineer requested that if we cannot locate the terminus of the pipe, we repair the pipe and provide the city the GPS coordinates. If the terminus is located and the pipe is not used or not connected to any other pipe or structure, EPA will cap off the broken ends of the pipe.

Washington Department of Ecology has requested that EPA abandon the existing 4 monitoring wells. Two of the wells were damaged by unknown persons at some time prior to April 2012.

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

EPA - 1
ERRS - 7
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.