

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #7  
Progress  
Stubblefield Salvage  
10HD  
Walla Walla, WA  
Latitude: 46.0646500 Longitude: -118.3689200

**To:**  
**From:** Jeffrey Fowlow, OSC  
**Date:** 5/25/2013  
**Reporting Period:** May 19-25, 2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	10HD	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	5/2/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Non-Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	5/13/2013	<b>Start Date:</b>	5/13/2013
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	WAN001002813	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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 ant 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 20 and lasted through Thursday, May 23, 2013.

**Overview:**

This week the main focus of the removal was excavation, transportation, and disposal of contaminated soil. A total of 1,822 tons of soil were disposed of at the Finley Buttes landfill in Oregon.

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 20:** A total of 478.07 tons of soil were loaded and transported to the Finley Buttes landfill. ERRS began backfilling the South Process Area (SPA); approximately 1,000 tons of backfill were installed and compacted. In other areas of the SPA, an additional 400 tons of contaminated soil was excavated and placed onto the waste pile for disposal. ERRS excavated test pits on the south side of the SPA and START collected confirmation samples. ERRS also excavated test pits on the east side of the Process Area and START collected extent of contamination samples. ERRS continued to remove oil from the groundwater surface in the excavation using absorbent pads. The amount of oil leaching from soil is greatly reduced from last week.

**Tuesday, May 21:** A total of 461.26 tons of soil were loaded and transported to the Finley Buttes landfill. Excavation continued in the Process Area, with contaminated soil added to the waste pile. The amount of oil leaching from the soil to groundwater has reduced to an unrecoverable sheen. An estimated 100 gallons of oil has been collected. Backfilling and compaction of the South Process Area was completed.

**Wednesday, May 22:** A total of 519.27 tons of soil were loaded and transported to the Finley Buttes landfill. A new road was constructed over the recently backfilled South Process Area. The new road will be used for loading trucks and was necessary because the existing road and the soil beneath it are contaminated and will be excavated.

**Thursday, May 23:** A total of 364.27 tons of soil were loaded and transported to the Finley Buttes landfill. START sampled test pits from areas that were previously inaccessible due to surface debris. These areas are to the east and northwest of the Process Area. START and ERRS personnel secured the work area and equipment for demobilization for the holiday weekend.

**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**

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
<b>Non-Hazardous Waste Soils</b>	Soil	1822.51 tons	0001-0056		X

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

EPA will continue to excavate, remove, and dispose of contaminated soil from the Processing Area.

#### 2.2.1.2 Next Steps

### 2.2.2 Issues

**Oil on groundwater:** The oil seeping from site soils onto groundwater has been effectively cleaned up by ERRS using absorbent pads. An estimated 100 gallons of oil has been recovered.

**Concrete pipe:** A 12" concrete pipe running through the Process Area was uncovered and damaged during excavation. The purpose of the pipe is unknown. At the request of City of Walla Walla County, we will repair the pipe during backfill operations and report the GPS coordinates to the City engineer's office.

**Monitoring wells:** ERRS released an RFP for well abandonment services. It is expected that the 4 existing monitoring wells will be abandoned during the week beginning June 17, 2013.

**Compressed gas cylinders:** A total of 6 compressed gas cylinders were recovered thus far during excavation activities. Four of the cylinders contained flammable gases, one was empty, and one could not be opened. ERRS is arranging disposal via an industrial gas distribution company.

**Additional areas of contaminated soil:** Some areas of the site near the processing area were previously inaccessible due to surface obstructions and buried debris. ERRS has been able to remove the obstructions and excavate test pits from which START has collected soil samples. These samples are currently undergoing lab analysis to determine extent of contamination.

## 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 - 9  
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.