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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #8**
Progress POLREP
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Jeffrey Fowlow, OSC
Date: 6/1/2013
Reporting Period: May 26-June 1, 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 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 Tuesday, May 28 and lasted through Saturday, June 1, 2013.

Overview:

This week the main focus of the removal was excavation, transportation, and disposal of contaminated soil. A total of 1,884.43 tons of soil were disposed of at the Finley Buttes landfill in Oregon for a cummulative total of 3,706.94 tons disposed thus far.

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.

Tuesday, May 28: A total of 202.10 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. An additional 400 tons of non-RCRA contaminated soil was excavated from the SPA and placed onto the waste pile for disposal.

Wednesday, May 29: A total of 557.01 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. Excavation continued in the Process Area, with contaminated soil added to the waste pile.

Thursday, May 30: A total of 598.35 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. Approximately 100 tons of non-RCRA contaminated soil were excavated and added to the waste pile. An additional 400 tons of lead-contaminated soil was excavated from the north and east sides of the Process Area and staged in a separate waste pile. ERRS excavated two test pits in the north and east side of Process Area and START collected samples. ERRS arranged off-site transportation and recycling/disposal of 2 compressed gas cylinders from a local gas vendor. Several capacitors have been recovered and have been stored in a 55-gallon drum..

Friday, May 31: A total of 526.97 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. ERRS excavated approximately 100 tons of non-RCRA contaminated soil from the north border of the process area. ERRS also excavated approximately 600 tons on non-RCRA contaminated soil in the Process Area. While preparing to excavate PCB-contaminated soil near the southwest corner of the shop building, a gray, powdery layer was observed within the top 1 foot of soil. START performed XRF analysis on the material and determined the material to have a very high lead content (17,000+ ppm). START began sampling other areas adjacent to the southwest corner of the shop building and discovered the lead content of soil at the surface to be elevated, with concentrations ranging from 500 ppm to five locations with concentrations exceeding 10,000 ppm. This area adjacent to the shop will require further characterization and removal.

Saturday, June 1: Approximately 650 tons of non-RCRA contaminated soil were excavated along the western border of the Process Area, near MW-02. ERRS fenced of the high lead area to prevent traffic across the area. ERRS relocated non-RCRA contaminated soil stockpiile to the upland area to open up the remainder of the Process Area for excavation. Two cylinders which were vented yesterday were vented again today. These two empty cylinders and another empty cylinder were disposed of in the soil pile. All known cylinders have been disposed. START XRFed 37 new sample locations attempting to complete an extent of contamination survey in the high lead area. START also collected 10 soil samples for analysis and prepared and shipped them to a laboratory.

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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Non-Hazardous Waste Soils	**Soil**	**3706.94 tons**	**0001-0113**		**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: No additional oil has been observed in the groundwater this week.

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 cooordinates to the City engineer's office.

Monitoring wells: ERRS awarded a contract to a Wahington-licensed drilling company to abandon the 4 existing moniotoring wells on site. The monitoring wells are scheduled to be abandoned June 13-14.

Compressed gas cylinders: A total of 6 compressed gas cylinders were recovered thus far durig excavation activities. Four of the cylinders contained flammable gases, one was empty, and one could not be opened. A commercial gas distributor removed 3 of the cylinders. ERRS vented two of the remaining three cylinders to the atmosphene from a vacant field. The remaining cylinder was empty and was disposed of with the contaminated soil.

Additonal 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. The extent of contamination is now known in four of the five areas and these areas of contaminated soil will be removed. The one uncharacterized area remaining is currently beneath a haul road used for loading trucks and will not be characterized until the road is no longer needed.

High lead contamination in soil: An approximately 5,000 square foot area in front of the shop has been identified as containing very high concentrations of lead. This area will require further extent of contamination surveillance and a plan to conduct removal in this area. This high lead soil will be dispoised of as RCRA hazardous waste.

Capacitors: Several small capacitors have been collected and placed into one 15-gallon drum. The capacitors will be disposed of as PCB-containing material.

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.