

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #9
Stubblefield Salvage
10HD
Walla Walla, WA
Latitude: 46.0646500 Longitude: -118.3689200

To:
From: Mike Sibley, OSC
Date: 6/7/2013
Reporting Period: June 2-8, 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, June 03 and lasted through Friday, June 07, 2013.

Overview:

This week the main focus of the removal was excavation, transportation, and disposal of non-RCRA contaminated soil. A total of 2756.00 tons of soil were disposed of at the Finley Buttes landfill in Oregon for a cumulative total of 6462.94 tons disposed of thus far.

Currently, a total of 63.90 tons of RCRA characteristic soils, were disposed of at the US Ecology facility.

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 June 3: Approximately 480 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. Excavation activities continued in the central portion of the process area up to the north limit of excavation near monitoring well 3. The approximate quantity of soil excavated today is 300 tons. Four ERRS personnel and two START personnel drove to Pasco today to receive pre-screening blood draw for lead analysis. START calculated an estimate of the area of lead contamination around the shop building as approximately 21,000 square feet. The WES contractor shipped air sampling instruments and media for the planned excavation of lead contaminated soil around the shop building, scheduled to take place later this week or early next week. START delivered 13 soil samples to the lab in Seattle including 4 confirmation sidewall samples with 5 day TAT for metals, PCBs, TPH, and SVOC analyses; 6 surface soil samples from around the shop building with 48 hr TAT for metals analysis; and 3 samples from the two stockpiles with 48 hr TAT for TCLP metals.

Tuesday June 4: Approximately 500 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. A total of 64 tons of suspected RCRA characteristic soil (D008) were loaded and transported to the US Ecology landfill in order to create a "recipe" for macroencapsulation. ERRS completed the excavation of 450 tons of soil in the eastern process area up to the northern limit of excavation, and continued to stockpile non-RCRA contaminated soil in the stockpile near monitoring well 1. A 500 gallon propane tank south of site residence had a slow leak which was confirmed with a MultiRAE photo-ionization detector (VOCs greater than 5.0 ppm), and a local propane vendor indicated they would retrieve the tank at no cost.

Wednesday June 5: Approximately 800 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill; the transportation contractor increased the number of trucks shipped off site today by utilizing a sub-contractor to provide additional trucks. Today ERRS completed excavation in the eastern and northeastern process area; approximately 550 tons of non-RCRA contaminated soil was excavated and added to the waste pile. ERRS widened the access road leading from Myra Road into the site and began to create a new truck decontamination area closer to the weigh scale. ERRS identified two additional propane cylinders, and vented both cylinders in the south portion of the property. START received preliminary results for some of the soil samples that were delivered on Monday June 3; the six soil samples collected from around the shop building were consistent with the XRF in-situ screening data; two of the confirmation sidewall samples from the western limit of excavation had generally low concentrations as compared to action levels; and the two confirmation sidewall samples from the northwestern limit of excavation near the swale included concentrations of PCBs and SVOCs near or above the action levels.

Thursday June 6: Approximately 525 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. ERRS completed the excavation in the northern and eastern portions of the process area; the only remaining areas to be excavated included a small portion of lead-contaminated soil in the southeastern corner, and the excavation around monitoring well 2 after the well is abandoned next week. Trucks with clean backfill are now bypassing the backfill stockpile and placing their load directly into

the excavated area. Preliminary results for the two stockpiles in the process area indicated that both stockpiles passed TCLP for all RCRA-8 metals. Ferrellgas arrived on site to remove the leaking 500 gallon propane tank located near the residence. START processed five soil samples including four samples collected today and one sample collected on June 4. The samples were shipped via FedEx to the lab for metals, PCBs, TPH, and SVOC analyses (two samples from the north sidewall have 48 hr TAT, and three samples from the east sidewall have 5 day TAT). At the end of the day START calculated the total area of excavation in the process area as 31,250 square feet.

Friday June 7: Approximately 350 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. No excavation was performed today in the process area, but ERRS sloped the sidewalls of the excavation area and removed most of the perimeter fencing. Clean backfill continues to be placed directly into the excavated area. A towing company arrived mid-morning and moved three disabled trucks near the shop building to the south area of the site; this will allow ERRS to access the lead contaminated soil in the upper bench area tomorrow. The truck decontamination area has been relocated near the weigh scale.

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	6363.67 tons	0001-0192		X
RCRA Characteristic Soils	Soil	63.90 tons	005072346 - 005072347		X

2.2 Planning Section

2.2.1 Anticipated Activities

End of next week anticipate all excavation activities will be complete.

Drillers on site to closeout monitoring wells

2.2.1.1 Planned Response Activities

ERRS will continue to excavate, remove, and dispose of contaminated soil from the Processing Area. Stock pile soils near shop area to prepare for sampling activities.

Continue load out of trucks into next week. Continue with backfill.

Continue with air monitoring while excavating the high lead contaminated area near the shop building.

2.2.1.2 Next Step

Sampling Data: Continue to XRF the additional operable units to determine extent of contamination. Ensure TCLP samples are sent to lab to determine waste streams for the four operable units.

2.2.2 Issues

Characterization of soils: Will need to continue to characterize the lead contamination in the northwest area (operable unit one) near shop building. There is lead contamination continues BGS one foot.

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.