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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

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

To:
From: Jeffrey Fowlow, OSC
Date: 6/13/2013
Reporting Period: Saturday, June 8, 2013 - Friday, June 14, 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 Monday, June 03 and lasted through Friday, June 07, 2013.

Overview:
During this reporting period, the most significant site development was the discovery of soil in the upland area of the site near the shop building that was heavily contaminated with lead. This area had been used to store automobile batteries and is likely where the batteries were broken and salvaged to recover metal. START spent a substantial amount of time analyzing soils samples with an XRF to determine the extent of contamination and to delineate areas exceeding cleanup concentrations. An area of approximately 17,500 square feet was contaminated with lead to a maximum concentration of 90,000+ ppm. This area was subdivided into 3 operational units, OU1, OU2, and OU3. Soil from each area was excavated in lifts and stockpiled. Each stockpile was sampled and the sample was submitted for TCLP analysis. The sample from OU1 failed TCLP and therefore the soil in the OU1 stockpile will require disposal in a RCRA-approved landfill (US Ecology) while samples from OU2 and OU3 passed TCLP allowing disposal in the non-RCRA landfill (Finley Buttes).

This week, excavation of contaminated soil from the Process Area was completed. Excavated soil was stockpiled on site and will be transported as non-RCRA soil to the Finley Buttes landfill in Oregon. A total of 2547 tons of soil were disposed of at the Finley Buttes landfill in Oregon for a cummulative total of 9172 tons disposed of thus far. A total of 291 tons of hazardous waste soil was transported to the US Ecology landfill in Idaho for a cumulative total of 355 tons 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.

Saturday, June 8: Approximately 100 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill.

Monday, June 10: Approximately 457 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. A total of 63 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 southeast Process Area. Samples of the lead and Process Area stockpiles were collected for TCLP analysis.

Tuesday, June 11: Approximately 550 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. ERRS excavated the second lift (to 2 feet bgs) at OU1. START XRFed the southeast area of the Process Area and confirmed that the lead-contaminated soil had been removed. ERRS backfilled that area. START XRFed OU2 and determined that 8 of the 20 locations tested exceeded cleanup levels for lead (400 mg/kg).

Wednesday, June 12: Approximately 526 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. ERRS excavated approximately 60 tons of PCB-contaminated soil near the southwest corner of the shop. Results of the stockpile samples submitted for TCLP analysis indicated that only the sample collected from the OU1 stockpile failed TCLP and thus requires disposal at the US Ecology RCRA-approved landfill. The soil from the stockpiles that passed TCLP was transported and combined with the soils going to Finley Buttes landfill for disposal. START XRFed the 2' bgs interval at OU1 and determined that only one location exceeded lead cleanup levels (that location was ultimately excavated and confirmed below cleanup levels). START XRFed the 0.5' bgs interval at OU3 and found 8 of 15 locations exceeded cleanup concentrations.

Thursday, June 13: Approximately 652 tons of non-RCRA contaminated soil were loaded and transported

to the Finley Buttes landfill. ERRS excavated "hotspot" contamination in OU2 and OU3 based on XRF results. ERRS used a HEPA vacuum and LeadSafe, a lead-binding solution, to remove as much lead-contaminated dust as possible from the floor of the shop. A drilling subcontractor was mobilized and all four EPA-installed groundwater monitoring wells were abandoned by over-drilling.

Friday, June 14: Approximately 262 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill and approximately 228 tons of hazardous waste soil were loaded and transported to the US Ecology landfill. ERRS began excavation in the former area of the OU1 stockpile. ERRS also moved the solid waste/debris (left by previous owner/operators) away from the eastern border fence line to reduce fire risk when the neighbor conducts weed burning. START used the XRF to survey OU2 and OU3 in 22 locations. Of those 22 locations, the lead concentrations in 5 locations exceeded cleanup levels, but the contaminant distribution is down to 3 hotspots.

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**	**9172 tons**	**0001-0271**		**X**
RCRA Characteristic Soils	**Soil**	**355 tons**	**005072346 - 005072347**		**X**

2.2 Planning Section

2.2.1 Anticipated Activities

All excavation activities will be completed by June 21, 2013..

2.2.1.1 Planned Response Activities

From June 17-19, ERRS will continue to excavate, remove, and dispose of contaminated soil from OU-1, -2, and -3.

Continue load out of trucks into next week. Continue backfilling excavated areas.

Continue 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.

Demobilization: Begin process of demobilization of personnel and equipment is anticipated next week.

2.2.2 Issues
On Thursday, the OSC received a phone call (voice mail) from the Chief, Programs and Project Management Division, Walla Walla Country Public Works. Several complaints had been lodged with the County concerning "track out" of mud and dirt onto Myra Road from trucks exiting the site. The OSC attempted to call the Chief back and left a message. All trucks are decontaminated, includijng a tire wash, immediately prior to departure from the site. Also, EPA had directed contractors to use a water truck and street sweeper to wash and scrub the street at the Myra Road entrance. Street cleaning was occurring two times every day. Upon inspection of the entrance, the OSC observed no loose dirt or mud in the entranceway nor any other significant debris. Nonetheless, the OSC directed ERRS to wash and sweep the entrance after each session of truck loading or any time any soil, mud, or debris was observed.

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

2.5.1 Safety Officer
On Saturday, June 8, residents of the neighboring property to the east of the site were burning weeds along the common fence line. The fire apparently ran to a debis pile consisting of tires, scrap metal, and woody materials. The debris pile caught fire and the Walla Walla Fire Department was called by ERRS. The WWFD put the fire out within about 15 minutes. There were no injuries and no damage of any consequence.

The EPA and ERRS and START contractors held a follow up safety meeting to review the incident and make sure proper safety protocols were followed. The possibility of fire had been brought up in the initial safety meeting. In the event of fire, the plan was for all workers to stop operations, call 9-1-1, remove equipment

from the roadways to allow fire engines to approach, and to allow the fire fighters access to the fire to do their job. Specifically, workers were told to NOT attempt to put out any fires for the safety of the personnel, property, and equipment on site. Site workers followed the site safety plan and the safety plan worked well as designed. Therefore, there is no need to amend the safety plan or take other remedial action.

2.6 Liaison Officer

2.7 Information Officer

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.