

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #11  
Progress POLREP  
Stubblefield Salvage  
10HD  
Walla Walla, WA  
Latitude: 46.0646500 Longitude: -118.3689200

**To:**  
**From:** Jeffrey Fowlow, OSC  
**Date:** 6/20/2013  
**Reporting Period:** Monday, June 17 - Friday, June 21, 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 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 17 and lasted through Friday, June 21, 2013.

**Overview:** During this reporting period, excavation of the high concentration lead-contaminated soil near the shop building was completed and the excavated areas were backfilled and compacted. A total of approximately 1,500 tons of lead-contaminated soil was excavated and disposed of from the Shop area. A total of 711.15 tons of RCRA D008 hazardous waste soil was transported and disposed of in the US Ecology landfill in Idaho. An estimated 800 additional tons of non-RCRA contaminated spoil was transported and disposed of at the Finley Buttes landfill in Oregon.

This week, a total of 3176 tons of soil were disposed of at the Finley Buttes landfill in Oregon for a cumulative total of 14,677 tons disposed of thus far. Also, a total of 356 tons of hazardous waste soil was transported to the US Ecology landfill in Idaho for a cumulative total of 711.15 tons. All soil qualifying as RCRA hazardous waste has now been shipped off site and disposed.

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/m<sup>3</sup>). 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 17:** Approximately 581 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. A total of 98 tons of RCRA characteristic soil (D008) were loaded and transported to the US Ecology landfill in Idaho. Backfilling and compaction of the Process Area has now been completed. Approximately 200 tons of contaminated soil was excavated from the area of former MW02. Excavation of "hotspot" contamination was ongoing in OU1, OU2, and OU3. Approximately 581 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. A total of 98 tons of RCRA characteristic soil (D008) were loaded and transported to the US Ecology landfill in Idaho. Backfilling and compaction of the Process Area has now been completed. Approximately 200 tons of contaminated soil was excavated from the area of former MW02. Excavation of "hotspot" contamination was ongoing in OU1, OU2, and OU3.

**Tuesday, June 18:** Approximately 650 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. Approximately 250 pounds of Asbestos Containing Material was disposed of with the soil going to Finley Buttes. A total of 194 tons of RCRA characteristic soil (D008) were loaded and transported to the US Ecology landfill in Idaho. Excavation of "hotspot" contamination was ongoing in OU1, OU2, and OU3. As "hotspots" were excavated and confirmed below cleanup levels, ERRS backfilled and compacted in OU1, OU2, and OU3.

**Wednesday, June 19:** Approximately 575 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. A total of 65 tons of RCRA characteristic soil (D008) were loaded and transported to the US Ecology landfill in Idaho. All RCRA characteristic soil has now been transported off site for disposal. One 15-gallon drum containing 25 PCB capacitors was transported off site to the Burlington Environmental facility in Kent, Washington. All "hotspots" have now been excavated from OU2 and OU3.

**Thursday, June 20:** Approximately 753 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. ERRS excavated the remaining "hotspot" contamination in OU1 and completed backfilling and compacting OU2 and OU3. Decontamination and demobilization of heavy equipment has begun.

**Friday, June 21:** Approximately 617 tons of non-RCRA contaminated soil were loaded and transported to the Finley Buttes landfill. OU1 has been backfilled.

**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><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Non-Hazardous Waste Soils	Soil	14,677 tons	0001-0370		X
RCRA Characteristic Soils	Soil	715 tons	005072346 - 005072347		X

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

**2.2.1.1 Planned Response Activities**

Continue and complete load out of trucks into next week.

**2.2.1.2 Next Step**

**Demobilization:** Complete demobilization of personnel and equipment is anticipated next week.

**2.2.2 Issues**

**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 (4 ERRS demobilized this week; 5 remain for next week)  
START - 1

**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.