

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Puget Sound Recyclers - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #1
Initial and Final
Puget Sound Recyclers
Z0DN
Auburn, WA
Latitude: 47.3022360 Longitude: -122.2286174

To:
From: Angie Zavala, OSC
Date: 3/26/2014
Reporting Period: 3/26/2014 to 3/26/2014

1. Introduction

1.1 Background

Site Number:	Z0DN	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/26/2014	Start Date:	3/26/2014
Demob Date:	3/26/2014	Completion Date:	3/26/2014
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E14003	Reimbursable Account #:	

1.1.1 Incident Category

Site Assessment

1.1.2 Site Description

The site sits on an approximately 1-acre outparcel leased by Puget Sound Recyclers (PSR) and is currently an abandoned waste oil recycling facility. The site has one structure used to treat process wastewater in the northeastern corner and approximately seven above ground storage tanks staged primarily in the northern portion.

1.1.2.1 Location

The Puget Sound Recyclers facility is located on an out-parcel within a BNSF easement addressed at 523 A St SE Auburn, WA.

1.1.2.2 Description of Threat

According to pictures taken on March 7, 2014, and information received from the environmental division manager of the City of Auburn, the abandoned recycling operation had uncovered makeshift holding 'containers' (tarp-lined wood frames) leaking oily waste and sludge. He estimated that as much as 100,000 gallons of liquid/sludge were abandoned on BNSF property in failing storage containers. The threat clearly was that these containers were leaking oily waste and sludge that could reach the nearby storm drain which connects to the Green River (water of the United States), especially with the heavy rain present this week. The Green River is less than a mile and a half from the site. Please see the drainage path to the river (pdf is attached).

On March 26, 2014, during the site walk attended by EPA and START, officials from the City of Auburn (COA), Washington State Department of Ecology (Ecology), and representatives with Burlington Northern-Santa Fe (BNSF) Railroad and their subcontractor, BNSF representatives communicated that the equipment and materials contained within were property of the facility owner (PSR). In addition, they informed that they have several wells installed around the site and they take water samples for analysis quarterly. Numerous drums were observed in various states including sealed, opened, and empty. A stockpile of soil was observed covered with visqueen and bermed with haybales along the western boundary of the site. Rainwater had collected in depressions in the visqueen but did not appear to have discharged from the bermed area. Several aboveground storage tanks, in ranging condition from good to fair, were observed. Process hoses were noted in the area of the tanks, some connected to an open sump in the area.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The site walk was convened to assess the current conditions at the facility and determine if a threat of release exists at the site.

The Puget Sound Recyclers facility is registered as having operated since at least 2004. Ecology performed an initial site investigation at the facility in late 2008/early 2009 but no other information regarding the status of the site was available since communication with the PRP was minimal and when conversation happened, the PRP communicated to Ecology that they could not do anything at the site until the lease was legally terminated.

The site walk was initiated with a safety brief by BNSF representative Bruce Sheppard stating that the area of concern was inside the fence of the PSR facility. During the site walk, BNSF representatives stated that the facility owners were removing equipment from the site as recently as a month ago. Additionally, BNSF said that entry to the water treatment structure was not possible due to access issues with the facility owner.

BNSF's major activities proceeding at the site to stabilize potential offsite impacts include pumping the liquids from the contaminated soil in the area of the stockpile and staging them in the vertical poly tank adjacent to the pile. The stockpile was contained by covering with visqueen and bermed with haybales. BNSF representatives communicated to the site walk attendees that continued work to remove all concerns at the site would begin by May 1st of the current year. Ecology requested that BNSF continue to apprise them of the progress at the site in the interim. The site walk concluded upon assurance that coordination with BNSF, and Ecology will continue and the agreement that BNSF will provide water sample results to the Environmental Division Program of the City of Auburn.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

BNSF has stabilized potential offsite impacts by pumping the liquids from the contaminated soil in the area of the stockpile and staged them in the vertical poly tank adjacent to the pile. The stockpile was contained by covering it with visqueen and berming it with haybales. The visqueen is stabilized with three car tires on the peak of the pile and covers an approximate 40-foot by 20-foot area and is approximately 15 feet tall. Samples of the soils and removed liquids were sent to an analytical laboratory and analyzed for VOCs, SVOCs, TAL metals, and PCBs.

BNSF representatives communicated to the site walk attendees that continued work to remove all concerns at the site would begin by May 1st of the current year. Ecology requested that BNSF continue to apprise them of the progress at the site in the interim. The site walk concluded upon assurance that coordination with BNSF, the site owner, and Ecology will continue.

2.1.2 Response Actions to Date

EPA and START performed a site walk at the site with representatives from the City of Auburn, Washington State Ecology and representatives of BNSF Railroad and their representatives. BNSF's major activities proceeding at the site include mitigating the stained soil and stockpile from potential offsite migration by removing contaminated liquids and covering the pile.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Puget Sound Recyclers (PSR) facility is registered as having operated since at least 2001. PSR is a leasee of the property. Burlington Northern-Santa Fe (BNSF) Railroad is the registered Property Owner.

2.2 Planning Section

2.2.1 Anticipated Activities

BNSF has agreed to address the rest of the site including the abandoned facility and its remnants. They gave a start date of no later than 1 May 2014. Ecology and the City will continue to be involved with the cleanup work.

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

3.1 Unified Command

3.2 Cooperating Agencies

City of Auburn (COA).

Washington State Department of Ecology (Ecology).

4. Personnel On Site

Chris Anderson - Environmental Division City of Auburn (COA).

Chris Thorn - Utilities Division COA

Chris Wilkerson - Hazardous Waste and Toxics Division Washington State Department of Ecology (Ecology)

Tracy Walters - Water Quality Division Washington Ecology

Scott MacDonald - Burlington Northern-Santa Fe (BNSF) Railroad Environmental

Bruce Sheppard - BNSF Environmental

Jeremy Rogers - Montgomery Scarp PLLC (BNSF Legal Representative)

Terry Park - Kennedy-Jenks (BNSF Subcontractor)

Laura Himes - Kennedy-Jenks

2 On-Scene Coordinators Environmental Protection Agency (EPA)

2 Superfund Technical Assessment & Response Team (START)

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.