U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Rattlesnake Creek Container - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #1**
Initial
Rattlesnake Creek Container
10NR
Dexter, OR
Latitude: 43.9151380 Longitude: -122.8668410

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From: Daniel Heister, On-Scene Coordinator
Date: 2/14/2015
Reporting Period: 10-Feb-2015 to 13-Feb-2015

1. Introduction

1.1 Background

Site Number:	10NR	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	2/10/2015	**Start Date:**	2/11/2015
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Referred from Oregon DEQ
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

The site is an emergency response removal action under CERCLA authority.

1.1.2 Site Description

The site is located in a lightly populated area on the west side of Dexter, Oregon. The site is a rural residence surrounding by other rural residences, small farms, and timber land. The site drains to Rattlesnake Creek which flows towards the northeast along the western side of the site property. The upper part of the property, where the EPA removal site is located, is elevated about 50 or 75 feet above the bank of Rattlesnake Creek. The site is accessible by work trucks by a gravel road. The site work area is generally level with some minor slopes and hummocks. Bedrock is exposed in some places, and in other places the soil cover is reported to be a few inches.

1.1.2.1 Location

The site is located at 37680 Kimball Road, Dexter, Lane County, Oregon. Dexter Lake, an impoundment of the US Army Corps of Engineers Dexter Dam Project, is located about 2 to 3 miles east of the site.

1.1.2.2 Description of Threat

Upon discovery, the site contained an estimated 1,000 containers of various industrial and laboratory chemicals. The containers were various sizes up to 55-gallon drums, and were in various conditions from

intact to punctured and leaking. Chemicals had, and were continuing to discharge to the environment at the site, primarily to the land surface. Rattlesnake Creek is nearby, and is likely to receive contamination from the site via runoff over the land surface and via transport by groundwater flow. Ecological receptors could be exposed by direct contact with leaking chemicals.

Two threatened or endangered species were identified in proximity to the site using the U.S. Fish and Wildlife critical habitat on-line mapping tool:

1. Bull Trout
2. Chinook Salmon

Other species identified as being present in Lane County, Oregon using U.S. Fish and Wildlife county reports:

1. Amphibian species (Rana pretiosa)
2. Bird species (Diomedea albatrus, Coccyzus americanus, Chardrius alexandrines nivosus, Strix occidentalis caurina, Brachyramphus marmoratus, Eremophila alpestris strigata)
3. Fish species (Salvelinus confluentus, Oregonichthys cramen)
4. Conifer species (Pinus albicaulis)
5. Flowering plant species (Lomatium bradshawii, Erigeron decumbens var. decumbens, Lipinus sulphureus ssp. Kincaidii)
6. Insect species (Speyeria zerene Hippolyta, Icaricia icarioides fender)
7. Mammal species (Arborimus longicaudus)
8. Reptile species (Dermochelys coriacea, Chelonia mydas, Caretta caretta, Lepidochelys olivacea)

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The initial assessment revealed that many containers were labeled legibly, but many were not. Labelled containers indicated a variety of chemicals were present at the site including acids and bases (corrosives), flammable liquids, dielectric fluid, and various solvents.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

After formal referral from Oregon DEQ, EPA quickly responded to the site on the morning of February 10, 2015 with START and ERRS response managers. The site was quickly assessed, and additional response and removal personnel, assets, and supplies were ordered for the emergency removal action. ERRS began removal actions on February 11, 2015 with scientific support from START.

EPA agreed to conduct removal operations from the part of the site identified as the "upper area". Oregon DEQ agreed to conduct removal operations from the part of the site identified as the "lower area". The nomenclature upper and lower describes an approximate 50 foot elevation difference between the two areas. This POLREP focuses on the upper area. The lower area is located along Rattlesnake Creek where the property main residence is located. A large unfinished shop is also present. This area has several "junk" vehicles and scrap with a few containers with used oil and lubricants. These containers are in fair condition.

2.1.2 Response Actions to Date

On February 10, 2015, a tractor-trailer truck blocking the road to the upper container field was noted as an impediment to implementing full and efficient removal operations. The property owner was consulted, and she agreed to have the truck moved. However, mechanical problems with the truck prevented it from being moved until about mid-day on February 11, 2015. The truck was documented as not containing any chemical products by DEQ before it was moved.

On the morning of February 11, 2015, ERRS began receiving personnel, equipment, and supplies on site. Blockage by the tractor trailer truck hindered efficient unloading and staging of equipment at the site.

START focused inventory efforts on containers that did not have legible labels or were suspected of not being labeled accurately. Containers that appeared to be a "lot" of the same product (based on container size, shape, markings, and location) were assigned a single ID number and the number of containers in the Lot were recorded. Orange marking paint was used during the inventory process to avoid double-counting containers, or accidentally omitting containers from the count.

START inventoried many of the legibly labeled containers, however, due to the pace of work, some of the inventory work was completed by ERRS - ERRS is supplying those inventory lists to START.

START sampled unknown containers for hazard classification analysis by a START chemist in EPA's on site mobile Lab Truck. The classification method used rapid field tests augmented by Fourier Transform Infrared Spectroscopy to determine characteristic hazards of the material which allowed the containers to be assigned a DOT hazard class.

START sampled container lots by collecting one sample from each half of the lot. Each sample was analyzed by the START chemist - if the sample hazard classifications matched, the lot was disposed of together without further sampling and analysis. Failure of the samples to match would result in more detailed sampling of the container lot.

On February 13, 2015, ERRS conducted a Level B entry into the recreational vehicle that was used to store 250+ containers of chemicals. Most of the chemicals in this vehicle had intact labels. See photo log on webpage.

ERRS used the sample hazard classification data generated by START to group and package containers according to their disposal requirements and compatibility with each other. ERRS packed small intact containers into drums and totes using the "lab pack" method - the intact original containers were placed into the overpacks without opening the original containers or removing their contents. ERRS packed

damaged containers (such as the brittle granular sodium hydroxide jars) drums using the "bulk pack" method - the damaged containers were scooped into drums where the contents intermingled.

ERRS crushed empty containers and site debris that was hindering site operations, and loaded this material into a roll-off bin designated for RCRA non-hazardous waste.

ERRS moved packed and inventoried lab packs to the lower part of the site and loaded them into the appropriate roll off bin (RCRA hazardous or non-hazardous).

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
The current property owner, Joan Hayden, has been identified as a PRP.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
RCRA Non Haz	Scrap				

2.2 Planning Section

2.2.1 Anticipated Activities
ERRS will continue packing remaining known chemical lots into totes and salvage drums.

ERRS will continue packing remaining unknown chemical containers after receiving hazard classification data from START.

START will continue sampling and classifying unknown chemicals until all are suitably classified for ERRS needs.

2.2.1.1 Planned Response Activities
ERRS site manager and chemist are working with the waste disposal company to generate waste profiles and manifests.

After chemical containers are packed for disposal, ERRS will remove soil from visibly contaminated areas. START will evaluate whether areas were sufficiently excavated using field instruments field tests, such as the TVA-1000B photo-ionization/flame-ionization detector and pH test strips.

2.2.1.2 Next Steps
ERRS plans to have waste streams removed from the site on February 17 or 18, 2015.

2.2.2 Issues
Waste shipments will not occur on February 16, 2015 because it is a holiday (Presidents Day).

2.3 Logistics Section

ERRS is managing removal equipment logistics, including heavy equipment, work tents, cascade air supply, roll-off bins, overpacks and totes, and PPE.

START is managing hazard classification logistics, data management, site air monitoring logistics, and sample collection logistics.

2.4 Finance Section

2.4.1 Narrative
EPA is financing emergency removal actions at the site using EPA Region 10 CERCLA funds.

2.5 Other Command Staff

2.5.1 Safety Officer
The EPA On-Scene Coordinator (and Incident Commander), Dan Heister, has overall responsibility for safety at this site.

The START safety officer is Eric Lindeman, followed by Mike Worden.

The ERRS safety officer is Patrick Heyneman.

2.5.2 Liaison Officer
The EPA OSC is functioning as the Liaison Officer.

2.5.3 Information Officer
The EPA OSC is functioning as the Information Officer. The OSC has personally spoken to three of the closest residnts to the site and described what EPA is doing on the property. These are rural, large acreage properties that share property lines with the site on the East/Northeast side. To the South/Southwest is a large parcel of Weyerhauser forest land that has recently been harvested.

3. Participating Entities

3.1 Unified Command
Unified command is not in effect at the site.

3.2 Cooperating Agencies
Oregon DEQ is cooperating with EPA, but is not present at the site during current removal operations. Oregon DEQ referred the site to EPA, and will conduct removal operations in the lower area of the site.

Local fire agencies supported site operations by recharging SCBA cylinders for EPA.

4. Personnel On Site

1 EPA OSC

4 START Scientists

6 ERRS Technicians and Operators

5. Definition of Terms

OSC = On-Scene Coordinator
EPA = United States Environmental Protection Agency
SCBA = Self Contained Breathing Apparatus
POLREP = Pollution Report
START = Superfund Technical Assessment Response Team (contracted to EPA)
ERRS = Emergency Response Removal Support (contracted to EPA)

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule
A final POLREP is planned to be generated upon completion of emergency removal actions. Intermediate POLREPs are planned for this site.

7. Situational Reference Materials

No information available at this time.