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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #2**
Rattlesnake Creek Container
10NR
Dexter, OR
Latitude: 43.9151380 Longitude: -122.8668410

To:
From: Daniel Heister, On-Scene Coordinator
Date: 2/16/2015
Reporting Period: 2/14/15-2/16/15

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 and 12, 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).

On 2/14/15, START continued supporting ERRS in inventory and sampling of unknown containers and drums for hazard categorization. START inventoried 123 unknown containers out of 233 inventoried to date. Team members sampled select containers for subsequent analysis on site. START performed hazard class assessments on 60 samples out of 127 samples to date. The most common hazard class associated to the samples was DOT 3 - Flammability followed by DOT 8B - Basic Corrosive Materials. The results were provided to ERRS contractors to assist in segregation and disposal of chemical containers. START also conducted photo-documentation of site activities, as well as data and project management tasks.
Also on 2/14/15 OSC Heister was contacted by a neighbor, who wished to remain anonymous, who claimed

that another six acre property owned by Ms. Haydn might also have waste on it. This property was located to the NW of the original site just on the other side of Rattlesnake Creek. Heister walked to 37640 Kimball Rd where he found a very old empty home built around 1910 (see photo log). Across Kimball Rd was a covered area that had no walls and a partially collapsed roof. Beneath this structure were numerous containers (1-5 gallon) similar to those found at the site at 37680 Kimball Rd. Since Heister had no access agreement for the property he took photos from the road and estimated that there were approximately 100-125 containers visible. Heister reported the development to his manager Calvin Terada who instructed him to contact EPA CID to invite them to the site. CID arrived on site the following day.

On 2/15/15, START continued supporting site operations with inventory and sampling of unknown containers and drums for hazard categorization. Work was wrapped up on the upper area of the site with regards to hazard categorization and inventory. START concluded the inventory of chemicals in that location with 456 records of individual containers of unknowns. Team members sampled select containers for subsequent analysis on site. START performed hazard class assessments on an additional 54 samples out of 181 samples to date. The results were provided to ERRS contractors to assist in segregation and disposal of chemical containers. An assessment was performed on the second property for potential future activities. START also conducted photo-documentation of site activities, as well as data and project management tasks.

USEPA/CID ASAC Eric Martensen arrived on site at approximately 10:30 AM on 2/15/15. OSC Heister took him on a tour of the site and then over to 37640 Kimball Rd location. Martensen requested an interview with the property owner Ms Haydn. Heister called Haydn and she arrived at the property at approximately 11:30 AM. We walked to 37680 Kimball Rd and showed her the additional chemicals in the collapsing shed. We did this from the road because she said the property belong to Weyerhaeuser Corp.(WHC). She said that there had been a long running dispute about the property line but she and her former partner finally acknowledged that the shed was on WHC property. She said that she was not aware that the chemicals were there and that she was seeing them for the first time, even though the containers were clearly visible from the road. She admitted that the containers looked very similar to those on her 37680 Kimball Rd property and that her now deceased partner likely put these containers on WHC property. Heister obtained written permission from Ms Hayden to enter and inspect the 37640 Kimball Rd property. Martensen, Haydn, and Heister inspected the old house on the property and determined it was empty and unoccupied. Martensen continued to interview Ms Haydn and Heister assigned two START to walk the 37640 property to look for waste. After an hour the STARTS reported that they found nothing suspicious on the property. Martensen finished his interview left the site at approximately 2:30 PM.

Heister began to try and contact WHC authorities in order to gain access to the property, but since it was Sunday and the following Monday was President's Day this proved difficult. Heister contacted Clifford Villa, USEPA ORC to discuss the situation. Villa advised Heister to continue to try and make contact with WHC but given the nature of the situation Heister could claim "Exigent Circumstances" and enter the property to look at the container and clean them up if necessary. Villa said that he would also try and contact WHC counsel.

At approximately 7:30 PM I was contacted by Mr. Dale Wonn, Environmental Manager, WHC. We discussed the situation at length and he agreed to meet me at the property the following morning at 7:30 AM. After the call I forwarded Mr. Wonn relevant documents and photos of the property via email.

On 2/16/15, START moved to the Weyerhaeuser property for inventory and sampling of unknown containers and drums for hazard categorization after ERRS removed the shed structure and removed chemical containers. Six unknowns were inventoried, sampled and Hazard Categorized. START demobilized the Lab Truck as ERRS completed container disposal operations. The site was photo-documented, and data and photos were processed. Heister met Mr. Wonn (WHC) and discussed the process of removing the containers from the WHC property. Mr. Wonn gave Heister verbal permission to remove the chemicals and assured him a formal access agreement would be signed by EOB. Heister's contractors removed, hazcated unknowns, and overpacked 165 containers from the WHC property. Contractors also scraped the bare ground area where the containers had been located. Mr. Wonn said that his contractors would be on site the morning of 2/17/15 to sample and characterize the site. Mr. Wonn agreed to provide sample results to USEPA upon completion. Because of similar containers and conditions of the WHC property to the larger site, EPA will review the data and determine if a future removal assessment might be warranted at the 37680 Kimball Rd site. At approximately 2:00 PM Heister received a signed access agreement from WHC.

START HAZCAT ACTIVITY

Date	HazCat Samples	Containers Inventoried
2/10/2015		1
2/11/2015		52
2/12/2015	28	241
2/13/2015	39	33
2/14/2015	60	120
2/15/2015	54	9
2/16/2015	6	6
Total	**187**	**462**

A total of 888 containers were removed from the site and this does not include 16,000, 10ml glass ampules of chromic acid which ERRS consolidated into drums for disposal.

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

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Triethlamine	Liquid	164 L			
Flamable	liquid	132 L			
Chromic Acid	Liquid	16 L			

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 18 or 19, 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

No information available at this time.

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 six of the closest residents 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.