

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Northwest Pipe & Casing/Hall Processing - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #5
Northwest Pipe & Casing/Hall Processing

Clackamas, OR
Latitude: 45.4149000 Longitude: -122.5200000

To:
From: Dan Heister, On-Scene Coordinator
Date: 11/21/2015
Reporting Period:

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date: 8/14/2015
Response Authority: CERCLA	Response Type: Non-Time-Critical
Response Lead: EPA	Incident Category: Removal Action
NPL Status:	Operable Unit:
Mobilization Date: 9/8/2015	Start Date: 9/9/2015
Demob Date: 11/21/2015	Completion Date: 11/21/2015
CERCLIS ID: ORD980988307	RCRIS ID:
ERNS No.:	State Notification: 06/15/2015
FPN#:	Reimbursable Account #:

1.1.1 Incident Category

See initial POLREP.

1.1.2 Site Description

See initial POLREP.

1.1.2.1 Location

See initial POLREP.

1.1.2.2 Description of Threat

See initial POLREP.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See initial POLREP.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

October 19 through 24

During this week, ERRS began to receive sand and gravel (2-1/2 inch minus), which will be used to backfill the excavation. The material was stockpiled in the test track area on the other side of the new highway from the excavation area, and START collected samples for laboratory testing.

Now that treated water from the water treatment system is being discharged directly to the wetland area, the additional storage tanks for the treated water (which had been used to store the water pending laboratory results) were emptied and then demobilized from the site. At the end of this reporting period,

approximately 600,000 gallons of water had been recovered from the excavation, treated, and discharged.

ERRS continued to excavate and set shoring boxes. By the end of the week, the shoring boxes for Bays 1 through 5 had been connected in a continuous row aligned approximately north-south. Surveyors were called out to the site to locate and stake the locations of boreholes BH05, BH03, B3, F8, and F9. The shoring for Bay 5 was set up as a half-length bay to allow for the extension of the north-south excavation axis to extend far enough to support the shoring for the planned east-west excavation, which will target an area of heavy contamination identified by the Geoprobe boreholes installed and sampled in September.

Excavated soil is stored in a series of seven containment cells that each hold approximately 250 cubic yards. Per the landfill's criteria, a sample from the soil in each cell is collected and analyzed for parameters of concern (initially VOCs, PCBs, SVOCs, and RCRA metals), and the soil is not moved to the main contaminated soil stockpile until laboratory results indicate that the soil is non-hazardous. During this reporting period, the landfill indicated that the SVOCs and RCRA metals could be discontinued, and only VOC and PCB analyses continued for the waste disposal profiling.

October 26 through 31

Each morning, the excavation was full of groundwater and/or precipitation that had accumulated overnight, so two ERRS workers came in early each day to start operating the groundwater pump and water treatment system so that excavation can begin after the rest of the crew arrived. By the end of this week, approximately 900,000 gallons of water had been treated and discharged.

During this reporting period, ERRS began to load the non-hazardous contaminated soil into trucks with trailers for transfer to the Subtitle D landfill in Hillsboro, Oregon. By the end of the week, a total of approximately 1,700 tons had been hauled off site for disposal.

Results for a sample of contaminated soil from one of the containment cells indicated that the concentration of tetrachloroethylene (PCE) was high enough that the sample could not be assumed to be non-hazardous without a TCLP test. Because the TCLP testing would take too long, EPA assumed that the soil in that cell was hazardous, and the soil was placed in a separate hazardous waste stockpile.

Shoring for Bay 6 was located and placed directly adjacent to the east of Bays 4 and 5. The northern end of Bay 6 was placed in alignment with the northern end of Bay 5. Because Bay 5 was a half-length bay, the southern end of Bay 6 is located at about the mid-length point of Bay 4. During excavation, dense non-aqueous phase liquid (DNAPL) was observed in the bottom of Bay 6. At the end of week, excavation was mostly completed in Bay 6 and the shoring was set up in Bay 7.

ERRS received the Daramend soil amendment at the site. Daramend is an anaerobic bioremediation agent which will be mixed with the backfill to promote degradation of any residual PCE or trichloroethylene (TCE).

Laboratory results from samples of the overburden were received and indicated that the soil contained PCBs at concentrations less than 50 milligrams per kilogram (mg/kg), along with polycyclic aromatic hydrocarbons (PAHs). Based on these results, EPA decided not to use the soil as backfill, and instead to dispose of it as non-hazardous contaminated soil.

On Saturday, October 31, a significant rain storm occurred at the site, so site work was limited to operating the groundwater pump and water treatment system.

November 2 through 7

During this reporting period, groundwater pumping, treatment, and discharge continued. At the end of the reporting period, approximately 1.4 million gallons of water had been discharged.

ERRS encountered a problem where infiltrating groundwater in Bay 1 continued to carry sand from behind the shoring plate (i.e., the sand from the previous removal action backfill) into the excavation, which threatened to undermine the ground surface outside the shored excavation and which tended to clog the pump. To prevent the sand infiltration, ERRS added the 2-1/2 inch minus backfill to the bottom of Bay 1 to raise the bottom of the excavation up above the bottom of the shoring plates.

ERRS continued to excavate in Bays 6 and 7, and ERRS began to install the shoring and excavate the overburden in Bay 8. ERRS continued to place excavated contaminated soil into the containment cells, and START continued to collect soil samples for rush laboratory analyses. Once laboratory results were obtained indicating non-hazardous, ERRS moved soil from each containment cell to the non-hazardous stockpile. The excavated contaminated soil from Bays 6 through 8 was wet and sludgy, so ERRS mixed the contaminated overburden soil to the soil in the containment cells to reduce the moisture content.

ERRS continued to load trucks and trailers with contaminated soil for the landfill. By the end of this week, a total of approximately 4,000 tons had been sent off site for disposal.

November 9 through 14

On Monday, November 9, EPA performed a safety audit of the site.

ERRS continued to operate the water treatment system. At the end of this reporting period, approximately 1.9 million gallons of water had been pumped, treated, and discharged.

During this reporting period, ERRS finished excavating in Bays 6-8 and began to backfill. Backfill consisted of sand mixed with the Daramend amendment up until over the level of the groundwater table. ERRS also continued to receive sand to be used as backfill. At the end of this week, backfill also began in Bays 1 through 5.

ERRS continued to load trucks with contaminated soil for off-site disposal. By November 11, approximately a total of almost 6,200 tons of non-hazardous soil had been transported to the Subtitle D landfill in Hillsboro, Oregon. Beginning on November 12, ERRS began to send the non-hazardous soil to the Subtitle D landfill in McMinnville, Oregon, instead. By the end of the week, approximately 700 tons of contaminated soil had been sent to McMinnville, for a total of approximately 6,900 tons of non-hazardous soil disposed of off site.

Also beginning on November 12, hazardous soil was loaded for transport to the Subtitle C landfill in Arlington, Oregon. By the end of the week, approximately 330 tons of hazardous soil was sent off site for disposal.

Barry Sanford from the Oregon Water Resources Department (WRD) visited the site to confer with EPA on how best to decommission the groundwater circulation wells (GCWs). Additionally, four monitoring wells, including two continuous multichannel technology (CMT) wells (CMT-2 and CMT-3), were located in the area of the new gravel laydown yard. The ground surface around these wells was raised, and WRD conferred with EPA on how to address them.

Laboratory results for contaminated soil in one containment cell indicated PCE concentrations above the TCLP threshold. Rather than submitting a sample for TCLP testing, EPA assumed that this soil was hazardous and transferred it to the hazardous waste stockpile.

November 16 through 21

During this reporting period, ERRS continued to operate the water treatment system. At the end of this reporting period, a total of approximately 2.2 million gallons of water had been pumped, treated, and discharged.

ERRS also continued to load trucks and trailers with contaminated soil for disposal at the off-site landfills. By the end of this week, a total of approximately 9,600 tons of non-hazardous soil and 770 tons of hazardous soil had been transported off site for disposal.

Backfill continued in Bays 6-8 and Bays 1 through 5. A compaction testing subcontractor was on site twice this week to perform in situ compaction testing of the backfilled sand and gravel.

During backfill, ERRS removed the shoring materials as bottom level of the excavation rose. Before removing shoring plates, spreader bars, and posts, ERRS decontaminated them with water processed through the treatment system using a water truck. The wash water was drained back into the excavation to aid in the compaction of backfill.

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

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Continued excavation of contaminated subsurface soil. Initial segregation of excavated soil based on hazard class and stockpiling for disposal. Receive clean fill material (sand and rock). Ongoing operational monitoring and maintenance of the groundwater treatment system. Ongoing monitoring and maintenance of construction BMPs. Discharge of treated water.

2.2.1.2 Next Steps

Continue to plan for and perform the ongoing activities, including close coordination with EPA Remedial Program, ODOT, Clackamas County, and OIW.

2.2.2 Issues

Amount of groundwater pumped from the excavation continues to exceed expectations.

Continued regular communication with shoring subcontractor to maintain site safety will be required.

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

Site Safety meetings occur at the beginning of each work day. No lost-time injuries have been reported.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

No information available at this time.

4. Personnel On Site

1 EPA OSC

1 EPA RPM (periodic site visits)

1 START

9 ERRS

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.