U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Bremerton Auto Wrecking - Gorst Creek Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #2**
Infrastructure work continues
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 4/30/2016
Reporting Period: April 24 - May 7, 2016

1. Introduction

1.1 Background

Site Number:	10GL	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	1/20/2016
Response Authority:	CERCLA	**Response Type:**	Non-Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	4/11/2016	**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:	WAN001002414	**RCRIS ID:**	WAH000048636
ERNS No.:		**State Notification:**	Yes
FPN#:		**Reimbursable Account #:**	

Site Description and Background

Gorst Creek Landfill (GCL) is an unpermitted landfill on the Kitsap Peninsula near Port Orchard (western WA) created in the late 1960s when the property owner at the time began disposing of waste in a deep ravine holding Gorst Creek. The creek was channeled through a culvert along the bottom of the ravine and waste was piled on top of the culvert to fill the ravine. During operation of GCL (1968-1989), local residents and businesses used GCL as a dump. For one year (1969-1970), the U.S. Navy contracted to dispose of all waste from the Puget Sound Naval Station at GCL (est. 93,000 cy).

CGL is currently estimated to contain 150,000 cy of waste. The culvert channeling the creek beneath the landfill has collapsed beneath the weight of the landfill in at least two locations, resulting in the impoundment of the creek upstream of the landfill. During periods of heavy precipitation, impounded water seeps through the landfill releasing contaminants downstream, and occasionally over tops the landfill causing the downstream slope to collapse into the creek, washing waste downstream and presenting a threat to State Highway 3 which is 100 yards downstream. There have been five major slope failures at GCL since 1997, typically associated with periods of heavy precipitation. Contaminants include PCBs, pesticides, SVOCs and metals.

EPA Site History

- 2005 to 2009: EPA conducts site assessments - Site does not list on NPL
- 2009: EPA notifies Navy of liability.
- 2012: EPA proceeds with EE/CA for removal action that proposes three alternatives: (1) replace existing culvert, $3 million; (2) reroute the creek around landfill, $7-8 million; (3) remove landfill and restore ravine and habitat, $30 million.

- 2012: EPA consults with Suquamish on the proposed alternatives. Suquamish raise treaty rights and request that EPA select an alternative to fully restore fish passage and habitat.
- EE/CA alternatives 2 and 3 would address Suquamish fish passage and habitat concerns but EPA lacks funding to implement either action.

RCRA Unilateral Admin. Order (UAO) to U.S. Navy

- EPA Region 10 issues RCRA § 7003 UAO to Navy for disposal of solid waste at GCL in Oct. 2014. UAO made effective by OECA AA in Feb. 2015 following conference with the Navy.

CERCLA Admin. Order on Consent (AOC)

- After UAO issuance of UAO by EPA, Navy negotiates with EPA.
- DOJ, EPA, Navy and ST Trust (owner) negotiate CERCLA AOC to replace UAO.
- AOC requires Navy to fully fund EPA's implementation of EE/CA alternative 3 (landfill removal) and the ST Trust to record environmental covenant that restricts development.

EPA has completed ESA and NHPA consultations,

2. Current Activities

2.1 Operations Section

2.1.1 Narrative/On Site Activities

April 25 – Equipment support request provided to ERT West; air monitoring instrumentation will be provided on loan at least until additional resource acquisition can occur. Representative for the lessor of the haul road arrived on-site to discuss road improvements on southern extent of haul road connecting Highway 3 SW. ERRS continued segregating and stockpiling surface debris on the landfill in preparation of initial excavation activities. Containment cell construction also on-going; the number of containment cells in the stockpile area reduced to seven (7) due to area limitations.

April 26 – Construction activities from previous day continued. START performs background gamma radiation survey on accessible portions of landfill and perimeters of stockpiled surface debris. START collected ambient radiation levels which were within typical background readings for this geographic location. Containment cell liners arrive on-site; construction begins on containment cell nearest to landfill. Pump contract awarded for creek diversion purposes.

April 27 – Construction activities from day previous continued. ERRS acquires grass seed for seeding temporary borrow near the command post. Security fencing arrives on-site and initial sections consisting of gate and adjacent portions were installed at the northeast corner of the site on the access road along the northern adjoining property. EPA coordinates with the Pacific Strike Team (PST) for site personnel.

April 28 – EPA, START, and ERRS met with the lessor providing site access from Highway 3 SW regarding issues pertaining to the lease agreement. A health and safety drill was performed utilizing escape packs to be deployed around the landfill for operators and technicians working in the excavation area. ERRS completes temporary fence installation on northeast boundary of site along Highway 3 SW.

April 29 – Construction activities from the previous day continued. Two Fish and Wildlife Service personnel arrived on-site a provided two time-lapse cameras to support site documentation activities. START completed GPS data collection of site features on the haul road, command post, and stockpile area.

April 30 – Construction activities from previous day continued; final block of containment cells completed today. All cells awaiting placement of the high-visibility liner to be placed on top of containment cells; however, placement of this layer will occur at a later date, but prior to placement of landfill excavation material with no sand layer between it and the high-vis layer.

May 2 – ERRS continued construction of the final cell in the stockpile area. Two to four inch crushed stone was received for road construction in the stockpile area and command post. The roads were compacted with a vibratory compactor to accommodate haul trucks during the excavation. START and ERRS discussed sample equipment procurement and analytical requirements.

May 3 – ERRS continued construction of the final cell and extending the road in the stockpile area with crushed rock. Two representatives from the PST arrived on site. The excavator was used to construct a pad using two to four inch crushed rock as a base for the bypass pumps in the impoundment. Equipment from ERT West was delivered to the site, including multiple AreaRae instruments and a Viper telemetry system.

May 4 – Activities from the previous day continued, including construction of the final cell and extending the road in the stockpile area with crushed rock. The excavator was used to improve access to the bypass pump location in order to connect pipes to the pumps later in the week. At approximately 5 am, a stolen vehicle was driven onto the site via the south access point and abandoned at the western access point. The on-site security reported the incident to ERRS, and a sheriff deputy stopped by the site to collect information. No items were reported stolen, and the only damage was to the fencing and gate.

May 5 – ERRS connected the pipes leading from the bypass pump in the impoundment, and continued the pipe connection along the access road adjacent to the Airport Auto Wrecking property located to the north of the Site. Approximately 130 sandbags were shuttled to the base of the landfill on the downstream side to form a settling pond. A START engineer arrived on site to observe the pipe connection and settling pond construction. Crushed rock was delivered and stockpiled at the site for construction of haul roads later in the week. A cylinder designed to hold propane was discovered along an access road. At 1330 hours, an

adult black bear and two cubs were observed on the landfill. All field personnel were notified of the bears via radio. START and the PST worked together to strategize daily field tasking and assignments during the excavation. PST collected GPS coordinates of site features around the stockpile area.

May 6 – EPA and START discussed the possibility of encountering asbestos-containing material (ACM) on site. START collected three air samples for phase contrast microscopy (PCM) asbestos analysis via NIOSH Method 7400 to determine baseline concentrations. One sample was collected in the command post area, and two samples were collected on the top of the landfill. ERRS continued to connect the sections of pipe for the stream bypass system. Additional sandbags were prepared for construction of the settling pond. Two Kitsap Public Health District (KPHD) visitors arrived on site to meet with the OSC. PST collected GPS coordinates of site features around the landfill, including the air sampling locations, as well as features in the stockpile area. START updated a table containing health and safety action levels. Copies of the action level table will be posted in the work trailers, and command post.

–START collected three air samples for PCM asbestos analysis via NIOSH Method 7400 to determine baseline concentrations. One sample was collected in the command post area, one sample in the stockpile area, and another sample in the landfill. Bulk samples of suspected ACM were collected from the landfill surface for polarized light microscopy (PLM) analysis via EPA Method 600/R-93/116. The asbestos analytical subcontract was awarded. ERRS continued to construct the haul road and build the settling pond for the stream bypass. PST collected GPS coordinates of site features around the landfill, including the air sampling locations.

2.2 Planning Section

2.2.1 Anticipated Activities

- Complete construction of containment cell construction within stockpile area
- Construct check dam downstream of landfill
- Improve haul road as needed
- Survey stream channel for 90% design
- Initiation of landfill excavation and removal activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

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

2.5 Safety Officer

OSC Rodin has requested site contractors develop a unified safety plan harmonizing ERRS and START safety plans for consistency of response levels, emergency procedures, and other safety issues.

3. Participating Entities

3.2 Cooperating Agencies

EPA Emergency Management Program has been cooperatively working with multiple agencies to develop ehte removal and restoration plan. The following agencies continue be involved in the review process as the plan is developed to the 90% stage.

Suquamish Tribe

Kitsap Co. Health District

Kitsap Co. emergency Management

WA State Department of Transportation

WA State Department of fish & Wildlife

City Of Bremerton

In addition EPA has completed ESA consultation with National Marine fishers Service and USFW, and NHPA consultations with the WA State Historic Preservation office, and Suquamish Tribe.

4. Personnel On Site

For the Week of April 11-16

EPA 1

START 1 , + 1 engineer

ERRS 8-9

5. Definition of Terms

SWPP – Stormwater Protection Plan

Thalweg – Lowest point in a stream (may or may not coincide with centerline)

6. Additional sources of information

6.1 Internet location of additional information/report

The administrative record for the GCL Removal can be accessed through the following link:

https://semspub.epa.gov/src/collection/10/AR64302

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.