# 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 #3

Infrastructure complete- Landfill Surface Debris Removed

**Bremerton Auto Wrecking - Gorst Creek Site** 

10GL

Port Orchard, WA

Latitude: 47.5099832 Longitude: -122.7405453

To:

From: Jeffry Rodin, OSC

**Date:** 5/21/2016

Reporting Period: 5/9/2016 - 5/21/2016

#### 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 NPLOperable Unit:Mobilization Date:4/11/2016Start 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.

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

#### May 9

- Adult bear and cubs were observed on site yesterday by the security guard, in the landfill area.
- · Continue construction of haul roads.
- · Construct downstream dam below face of landfill.
- START engineers on site to observe stormwater BMPs.
- EPA/START/ERRS meeting regarding potential to encounter asbestos on site.
- · Collect site features with GPS unit.

#### May 10

- · Receive scale house.
- Prepared haul road section for installation of scale.
- Identify on-site borrow source for constructing spur roads on landfill surface.
- · Update site maps with revised GPS coordinates of site features.
- · Assess Viper and air monitoring capabilities.
- Discuss AreaRae sensor configuration for optimal site health& safety.
- Finish downstream dam construction.
- Deliver asbestos samples (air and suspected bulk) collected during the previous week to the lab.
- · Inventory instrumentation on site. High-visibility orange liner was installed in the stockpile cells.
- Install additional site signage.
- · Discuss seed mix and schedule for ordering shrubs and trees for restoration efforts.
- Print large maps and site figures for planning purposes.
- Receive analytical results for air samples submitted to the laboratory for asbestos analysis from the command post, stockpile, and landfill; all sample results ranged from 0.002 to 0.004 fibers per cubic centimeter (f/cc). For reference, the action level for upgrading to level C PPE on site is 0.1 f/cc.

#### May 11

- · Continue building spur roads into landfill.
- Surveyor arrived today to begin surveying downstream reach below Hwy 3. This data will be used to help complete the 90% design document.
- Continue inventory and assessment of Viper and instrumentation.
- Submit additional equipment request to Region 10 warehouse.
- Inquire with ERT-East regarding site visit to deploy Viper.
- Surface debris on the landfill identified as potentially containing asbestos was isolated and secured for future removal.
- Assess 5 drums in level B PPE that were not clearly empty or compromised; only 1 drum had contents that were sampled.
- START engineer-related tasks continued work on the stormwater pollution prevention plan and GPS collection of stormwater controls.
- Landline internet was provided to the site.

#### May 12

- Introduce concept of JHA (job hazard analysis) for each task performed on site.
- EPA/START/ERRS received two hour asbestos awareness course from Med-Tox Northwest.
- EPA and ERRS toured the local Waste Management transfer facility.
- START retrieved the time-lapse camera; it was not recording because the batteries appeared to have failed.
- Additional START personnel and equipment arrived on site from the Seattle office and warehouse, respectively.
- A total of six fixed air ample and monitoring locations were identified on the site.
- The sample collected from the drum on May 11 was characterized using the FirstStep process;

the sample was not characteristic of hazardous waste.

- Finished installation of stream bypass pipe, including remaining two downstream sections and diffuser.
- EPA and START contacted Washington L&I to discuss asbestos-related issues.
- Received twenty 85 gallon drums and twenty 95 gallon overpack containers.

# May 13

- Install scale house.
- Run electric line to the scale house.
- Finish installing rock ramps around base of scale.
- Inspect and inventory cylinders in cylinder staging area.
- Prepare justifications for purchasing dedicated equipment for the site.
- Trouble-shoot and redeploy time-lapse camera.
- Deploy three air samplers on the landfill for asbestos analysis.
- Test range and connectivity of Viper Lincs and Gateways at the command post.
- Complete stormwater BMP site map.
- Prepare figure showing fixed air sampling and monitoring locations.
- Discuss integrated health and safety plan with Coast Guard, EPA, START and ERRS.
- Submit equipment request to ERT-Cincinnati and ERT-Edison.
- START reviewed draft excavation plan.
- START drafted a scope of work for geotechnical survey.
- Label stockpile cells #1 -7.

#### May 14

- Deploy three air samplers on the landfill for asbestos analysis.
- Test range and connectivity of Viper Lincs and Gateways at the stockpile locations.
- Review stormwater pollution prevention plan (SWPPP) with ERRS.
- Purchase office supplies and print hard copy SWPPP.
- Build second spur road on the landfill using on-site borrow source material.
- Identify and mark buried drum in the north section of the landfill.
- Install 2 underflow drains in the settlement ponds.
- Install silt fence downstream of the culvert.
- Inventory PPE.
- · Plan for next week's activities.

## May 16

- Phone call with Labor and Industries (L&I) regarding asbestos on site.
- PST reviewed the integrated HASP.
- Confirmed Waste Management hours for holidays.
- Deployed 3 fixed air samples.
- Collected 1 personnel air sample.
- Finished lining all stock pile cells with high visibility liner.
- A grapple hook was welded onto one of the excavators. The grapple hook will allow for more
  efficient use when moving landfill debris..
- Constructed some covers for air monitoring stations.
- START discussion regarding rapid scaling of VIPER, plan to contact ERT for advice.
- Updated RAE purchase justification including tables.

# May 17

- Moved tires from landfill to cell #7.
- Reviewed the exclusion zones and PPE; Inside of the exclusion zone is level C.
- Extended Health and Safety meeting included the review of the evacuation plan, traffic control
  plan, and the exclusion zone bounds.
- Collected 4 fixed air samples and 3 personnel samples.
- START performed a weekly storm water inspection with PST.
- Completed the scale calibration.
- A second tire recycler visited the site.
- ERRS collected trash in the downstream reach.
- EPA/START had a meeting to discuss EPA equipment.
- Multiple calls with Labor and Industries, to discuss level of asbestos training to augment the existing OSHA 40 hour HAZWOPER training.
- Deployed VIPER at several air monitoring stations.

- Worked on staffing for START for the next weeks.
- 5 additional GES employees arrived on site today.

## May 18

- Argus Pacific training for Gorst Creek Asbestos Worker was scheduled for Friday and Saturday (May 20&21) for all ERRS and GES workers on site.
- Hauled tires into stockpile cell 7.
- Hauled concrete to middle of stockpile.
- Hauled metal to 2 roll-off bins in stockpile.
- Picked up trash upstream near the Hwy 3 culvert.
- Moved cardboard rolls (from the liners) to adjacent cardboard recyclers on property.
- EQM received second bid for the tire recycling.
- Deployed VIPER in Air sampling locations 1, 2, and 3.
- 3 Personnel air samplers for asbestos (haul truck, haul truck, excavator).
- Fixed air samples at Air sampling locations 3, 5, and 6.
- PST worked on ProRAE telemetry troubleshooting to get AreaRAEs remotely connected and provide real time data to a laptop in the command post.
- PST proposed additional person for site assistance.
- START continued work on tasks including equipment management, VIPER, Staffing, and Scribe.
- START identified area west of stockpile requiring BMPs. START conferred with ERRS to install
  further stormwater BMPs, ERRS plans on installation tomorrow.
- START revised the HASP PPE Action Level format.
- START submitted sample geotechnical scope of work contract to EPA.
- EPA OSC & START requested additional equipment from ERT-OH.
- Site discussion regarding re-use of PPE and exclusion zones near the support Conex boxes and bathrooms.

## May 19

- Installed BMPs at additional location west of the stockpile.
- Hauled concrete to the stockpile.
- Hauled steel to stockpile, first 2 bins are full.
- Continued to pick up trash in stream channel upstream of Hwy 3 culvert.
- EPA technical advisor arrived on site to assist with connecting to the time capsule for data sharing.
- Installed the second time lapse camera on site near air station 3.
- START updated staffing schedule.
- Deployed 3 fixed air samplers, and 3 personnel air samplers.
- Deployed VIPER at air stations.
- START performed daily stormwater inspection 0.05 inches of rain fell yesterday evening.
- Pump subcontractor dropped off 6 additional sections of pipe for bypass if needed.
- START updated Scribe, prepped samples for shipment to lab for analysis.
- T&D contract awarded to Waste Management.

# Friday, May 20

- ERRS workers attended on-site asbestos training provided by local training provider.
- Kitsap County Public Health representatives visited and toured the site.
- START continued to perform air monitoring and sampling at several site air monitoring stations and continued to test and optimize the Viper system.
- START shipped air samples collected this week to the asbestos lab.
- ERRS shipped two bins of metal (13.64 cubic yards) off site for recycling and received \$977 as income back to the project.
- EPA provided the Puget Sound Clean Air Agency with a courtesy notification with regard to asbestos.

# Saturday, May 21

- · ERRS workers continued to attend on-site asbestos training.
- START continued to perform air monitoring and sampling at several site air monitoring stations and continued to test and optimize the Viper system. In particular, Viper and a MultiRae Pro was deployed and tested on an excavator.
- START checked on and downloaded photos from the time-lapse camera.
- START performed daily stormwater inspection; 0.02 inches of rain yesterday, and 0.28 inches today

# 2.2 Planning Section

No information available at this time.

#### 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

EPA 1-2

USCG Strike Team 2

START 4-6

ERRS 16

## 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.