

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 #4
Excavation and Hauling Begin
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 5/28/2016
Reporting Period: 5/23/2016 - 6/4/2016

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

- o 2005 to 2009: EPA conducts site assessments - Site does not list on NPL
- o 2009: EPA notifies Navy of liability.
- o 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.
- o 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.
- o 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

Monday, May 23

- Excavation began at the northwest corner of the landfill. By the end of the day, 35 truckloads of landfill waste were transferred to Containment Cell 1.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. START also continued to develop and test the Viper system. Air monitoring results were below action levels and within normal limits.
- Lab results for asbestos air samples collected the previous week were received and the results were below action levels.
- A second time-lapse camera was mounted at the NE corner of the landfill.
- ERRS installed and began to implement a site personnel tracking board for exclusion zone entries.
- Windssocks were deployed north of the landfill (monitoring station 2) and at the laydown area (monitoring station 5).

Tuesday, May 24

- Excavation of landfill waste continued, and general landfill waste was transferred to Cell 1. By the end of the day, 25 loads of landfill waste, 9 loads of concrete, 6 loads of steel, and 1 load of tires had been transferred to the laydown area.
- ERRS excavated to the northern property boundary and discovered that the landfill waste continues onto the Airport Auto Wrecking yard property.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- Kitsap County visited the site to meet with the OSC and was notified of the landfill waste that continues off the site property to the north.
- The OSC called the EPA Region 3 contracting officer (CO) to request a waiver to the ERRS contract that will allow the final confirmation samples to be submitted to the ERRS-subcontracted laboratory.
- ERRS refilled several escape packs at a local dive shop.
- The EPA Region 10 environmental laboratory in nearby Port Orchard (Manchester Environmental Laboratory) provided six generators for use at the site. The generators will be used to provide power at the air sampling and monitoring stations.
- START collected samples from the stockpiled material in Containment Cell 1 for waste profiling analyses. Per Waste Management's requirements, 10 samples will be collected from the first 2,000 cubic yards. The first five samples were collected today.
- ERRS installed decals with numbers on the equipment to facilitate better safety and radio communication between operators and ground personnel.
- A third time-lapse camera was installed on the EPA command post., to document the stockpile area.

Wednesday, May 25

- Excavation of landfill waste continued, and the waste was transferred to Cell 2. ERRS filled Cell 2 today and started to fill Cell 3. By the end of the day, 44 loads of landfill waste and 1 load of steel was transferred to the laydown area.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- EPA met with the business owner of Airport Auto Wrecking to discuss letting EPA continue the excavation of landfill waste onto that property.
- START transferred the samples from the previous day to a courier for delivery to the off-site commercial lab. START collected an additional five waste profile samples from Cell 2.
- ERRS and START managers visited the Waste Management landfill in Arlington, Oregon, to discuss site-related transportation and disposal details and tour the facility.
- A START asbestos building inspector assessed a suspect material intermingled with the concrete debris stockpiled in the laydown area. START collected three samples and sent them to the asbestos laboratory for analysis.
- A gasoline storage tank was delivered to the site and an installed with spill containment. On-site gasoline storage will be used to support the generators at the air monitoring stations.
- An ice chest freezer was delivered to the site and placed in the EPA lab trailer. The ice chest will be used to store ice for environmental samples.

Thursday, May 26

- ERRS continued to excavate landfill waste and filled Containment Cell 3. By the end of the day, 45 loads of general landfill waste were transferred.
- START collected four waste profile samples from Cell 3. After the initial 10 waste profile samples from the first 2,000 cubic yards of waste collected the previous two days, samples are now collected at the rate of 1

for every 500 cubic yards of waste. Beginning with Cell 3, approximately 2,000 cubic yards will be stored in each containment cell, and four confirmation samples will be collected from each cell.

- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- ERRS built shelves and a table for use in storing and donning/doffing PPE at the decon and break area.
- In anticipation of rain later this week, ERRS began to tarp the waste stockpiles in the completed containment cells.
- The EPA OSC received a return call from the Puget Sound Clean Air Agency regarding the asbestos portion of the removal action.
- An automatic external defibrillator (AED) was installed in the EPA command post.
- The Washington Department of Fish & Wildlife contacted the EPA OSC to give an alert about a bear sighting in the creek ravine downgradient of the site, where downstream surface water monitoring is performed. Site staff was notified and bear safety was discussed in the next health and safety meeting.

Friday, May 27

- Two loads of steel were sent off site for recycling (total of 19.48 tons, for a \$1,740 credit to the project).
- ERRS continued to excavate in the landfill, with the general waste transferred to Containment Cell 4. By the end of the day, 56 loads of landfill waste, 4 loads of concrete, and 3 loads of steel were transferred to the laydown area.
- The samples collected from Cell 3 were given to the courier for delivery to the lab.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- Lab results for asbestos air samples collected earlier in the week were received and the results were below action levels.
- START installed a rope and pulley system at the time-lapse camera pole south of the landfill to elevate a Gateway device to improve Viper wireless communication performance.
- The EPA OSC met with the business owner of Airport Auto Wrecking to provide copies of an access agreement. The business owner stated that he would give the access agreement to the property owner for her signature so that EPA can remove the landfill waste from the wrecking yard property.

Saturday, May 28

- ERRS continued to excavate in the landfill. Waste was transferred to Containment Cells 4 and 5. By the end of the day, 55 loads of landfill waste, 5 loads of concrete, and 3 loads of steel were transferred to the laydown area.
- START collected four waste profile samples from Cell 4, and ERRS delivered them directly to the lab.
- There was heavy rain on site throughout the day.
- Inspections of the erosion control BMPs were conducted.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.

Monday, May 30

- No site work for Memorial Day.

Tuesday, May 31

- ERRS continued to excavate in the landfill and transferred 56 loads of waste to Containment Cells 5 and 6. Additionally, 3 loads of concrete and 2 loads of tires were transferred to the laydown area.
- START collected four waste profile samples from Containment Cell 5, and the PST delivered them directly to the lab in Tacoma.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- Representatives from Waste Management and their transportation subcontractor were on site to discuss site logistics with ERRS.
- START performed a radiation survey with a Ludlum 19 gamma scintillator at some equipment where the MultiRAEs had detected gamma radiation at levels slightly above background. The readings with the Ludlum were within normal ranges.
- Analytical results were received from the landfill waste in Cell 1, which contained the first five stockpiles for waste profile sampling. One of the sub-stockpiles failed for TCLP lead (5.7 mg/L). The other parameters (PAHs, PCBs, and TCLP VOCs) were all below the landfill's limits.

Wednesday, June 1

- ERRS continued to excavate in the landfill and transferred 42 loads of waste to Containment Cell 6.
- START collected four waste profile samples from Containment Cell 6, and the PST delivered them directly to lab.
- ERRS began to load waste from Containment Cell 1 (except for the one stockpile that was hazardous for lead) into trucks and trailers for off-site disposal as non-hazardous waste. At mid-day, results from the stockpiles in Containment Cell 2 were received and were below the landfill's limits, so waste load-out continued from Containment Cell 2. A total of 37 loads and approximately 1,200 tons were sent off site today.
- Two bins of steel (approximately 20 tons and a \$1,900 credit) and two loads of tires (approximately 50 tons) were sent off site for recycling.
- EPA received signed access agreement for the Airport Auto Wrecking property to allow for the removal of the landfill waste on that property.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.

Thursday, June 2

- ERRS continued to excavate in the landfill and transferred 51 loads of waste to Containment Cells 6 and 7. Also, 2 loads of concrete and 8 loads of steel were transferred to the laydown area.
- A representative of the South Kitsap Fire Department was on site to coordinate with EPA in the event of a

fire or health and safety emergency.

- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.

Friday, June 3

- ERRS continued to excavate in the landfill and transferred 60 loads of waste to Containment Cell 7. Also, 1 load of concrete and 1 load of tires were transferred to the laydown area.
- ERRS loaded waste from Containment Cells 2 and 3 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 40 loads and approximately 1,290 tons were sent off site today.
- Two bins of steel (approximately 20 tons and a \$1,050 credit) were sent off site for recycling.
- START collected three waste profile samples from Containment Cell 7, and the PST delivered them directly to the lab.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. START also began to collect personal air samples from site workers for lead. Air monitoring results were below action levels and within normal limits.

Saturday, June 4

- ERRS continued to excavate in the landfill and transferred 72 loads of landfill waste to Containment Cells 7 and 2. Containment Cell 1 was skipped because it still contains the sub-stockpile of soil that will be sent off site as hazardous for lead. Also, 2 loads of concrete were transferred to the laydown area.
- ERRS loaded waste from Containment Cells 3 and 5 into trucks and trailers for off-site disposal as non-hazardous waste. Note that Containment Cell 4 was skipped because of a PCB result that needs to be re-run at the lab. A total of 30 loads and 970 tons were sent off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.

2.2 Planning Section

Disposal

Waste will continue to be segregated, staged in stockpiles, and characterized for proper disposal.

Progress

<i>Waste Stream</i>	<i>Quantity (current period)</i>	<i>Quantity (total to date)</i>	<i>Disposal</i>
Scrap Metal	20.76 tons	94.37 tons	Recycling
Concrete			Recycling
Debris/Soil Non Haz	tons	10,148.87 tons	Off-Site
Tires	72.66 tons	72.66 tons	Recycling/Energy Recovery
RCRA Soils	154.93 tons	154.93 tons	Off-Site

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

An Integrated Health and Safety Plan (HASP) has been developed that combines the ERRS and START safety plans for consistency of response levels, emergency procedures, and other safety issues. Site workers have been briefed on the Integrated HASP, and it is available to everyone on site.

3. Participating Entities

3.2 Cooperating Agencies

EPA Emergency Management Program has been cooperatively working with multiple agencies to

develop the 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 3

START 5-6

ERRS 118

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.