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 #6**
Progress
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 6/20/2016
Reporting Period: 6/20/2016 - 7/1/2016

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

Monday, June 20

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 4 and 5.
- ERRS loaded waste from Containment Cells 5 and 6 into trucks and trailers for off-site disposal as non-hazardous waste; one load of steel was also shipped off site for recycling.
- START collected samples from Containment Cells 4 and 8 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- START shipped air samples for asbestos analysis; the samples were collected 6/16/16 through 6/18/16.
- 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.
- START submitted weekly equipment report to the OSC, which includes an inventory of assets from the following sources: EPA Region 10 Warehouse, EPA Region 10 Manchester Laboratory, EPA ERT-Las Vegas, EPA ERT-Cincinnati, EPA ERT-New Jersey, USCG Pacific Strike Team, and WA Department of Fish and Wildlife, as well as assets purchased for use by site funds.
- START engineer, was on site to meet with the OSC.
- ERRS mobilized two additional personnel to the site to begin removing the fence separating Airport Auto Wrecking property and the landfill.
- ERRS performed a site walk for hydroseed contracting.

Tuesday, June 21

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 5 and 6.
- ERRS loaded waste from Containment Cells 6 and 7 into trucks and trailers for off-site disposal as non-hazardous waste.
- START collected samples from Containment Cell 5 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- 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.
- Site visitors included EPA R7 Contracting Officer, other R10 OSCs and R10 WES, ERRS EQM was also on site.
- ERRS continued removing the fence separating Airport Auto Wrecking property and the landfill.
- Additional equipment was received at the site, including six electronic personal dosimeters for field personnel.

Wednesday, June 22

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 6 and 7.
- ERRS loaded waste from Containment Cells 2 and 7 into trucks and trailers for off-site disposal as non-hazardous waste.
- START collected samples from Containment Cell 6 for waste profile analysis, the samples were delivered to the laboratory via courier service.
- 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.
- START shipped air samples for asbestos analysis; the samples were collected 6/20/16 and 6/21/16.
- START performed in-situ screening with the XRF instrument in the northwest corner of landfill at 10 locations; the maximum concentration of lead was 122 mg/kg.
- EPA OSC Rodin and OSC Parker performed a site walk at the Airport Auto Wrecking property along with representatives from START and ERRS. START collected GPS coordinates of features at the Airport Auto Wrecking property during the site walk.
- ERRS continued removing the fence separating Airport Auto Wrecking property and the landfill, and began installing a temporary fence approximately 20 yards northeast of the original fenceline.
- START submitted a draft Equipment Repositioning Memorandum to EPA which outlined the process for repositioning EPA R10 assets in case of an emergency response.
- START performed a radiation survey at Containment Cell 8 and detected elevated readings with the Ludlum 19 (background was 5 uR/hr with maximum reading was 300 uR/hr) and the Ludlum 2241-2 with 44-9 probe (background was 35 counts per minute [cpm] with a maximum of 581 cpm). START began to develop a plan and arrange for specialized staff and equipment to be site early the following day. A survey of Containment Cells 1 to 7 with the Ludlum 19 revealed no radiation above background concentrations.

Thursday, June 23

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 2 and 7.
- ERRS loaded waste from Containment Cells 2 and 3 into trucks and trailers for off-site disposal as non-hazardous waste.
- START collected samples from Containment Cell 7 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- 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.
- EPA coordinated with the EPA Radiological Emergency Response Team (RERT) personnel regarding procedures for entry and identification of the radiological sources. Notifications were also made with the Kitsap Co. Health District.
- Additional START personnel arrived on site with additional radiation instrumentation, including Ludlum 2241-2 with 44-2 "sausage" probe, the Sam-940, and Rad-Eye B20. START/ERRS/PSTS isolated the source (a cable 3 feet in length, tan in color) along with the surrounding soil and debris, and placed the items inside two drum liners, which were then placed inside a 55 gallon metal drum. The SAM-940 identified the cable as the source containing Radium 226 with 94% confidence; it also provided readings of 1,745 uR/hr and 14,492 cpm. The drum was then relocated to the cylinder staging area which is at the far corner of the stockpile area and away from most site activity. START performed a survey of the drum in its new location with the Ludlum 2241-2 and 44-2 probe; at the drum the readings were 175 uR/hr, and 5 feet away from the drum the readings were 8 uR/hr which was twice background readings.

- OSC Rodin met with OSC Parker to discuss additional Viper purchases, the Airport Auto Wrecking SSSP, and the Soil Confirmation SSSP.
- START collected GPS coordinates of features of the landfill including depth of excavation.
- Kitsap Co. Health district personnel visited the site and met with OSC Rodin.
- ERRS continued removing the fence separating Airport Auto Wrecking property and the landfill.

Friday, June 24

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 2 and 3.
- ERRS loaded waste from Containment Cells 1 and 3 into trucks and trailers for off-site disposal as non-hazardous waste.
- 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.
- A 30-gallon container was uncovered in the landfill and was partially filled with a watery substance; the material was sampled and determined to be rusty water using the FirstStep process.
- OSC Parker proposed revisions to the Airport Auto Wrecking Property SSSP because it appears that a majority of the road adjacent to the fence line will be excavated, thus negating the need for soil sampling from the road.
- New EQM personnel arrived on site to transition in as replacement as the Transportation and Disposal Coordinator.
- START collected samples from Containment Cell 2 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- START shipped asbestos air samples collected 6/22 and 6/23 (COC 10GL-043) for laboratory analysis. START also shipped lead air samples collected 6/21 and 6/23 for laboratory analysis.
- OSC and START inventoried new equipment delivered to the site including three 5-minute ELSA escape breathing devices and four stationary high volume sampling pumps.
- ERRS continued removing the fence separating Airport Auto Wrecking property and the landfill.
- START conducted weekly SWPPP inspection. No stormwater discharge from site, and water quality was monitored for pH and turbidity at Gorst Creek, downstream of Hwy 3 culvert.

Saturday, June 25

- ERRS continued to excavate in the landfill and transferred waste to Containment Cell 2
- ERRS loaded waste from Containment Cells 1 into trucks and trailers for off-site disposal as non-hazardous waste, although capacity was limited due to trucks breaking down.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. All six air stations had high volume sampling pumps for the first time which was made possible by the recent acquisition of additional pumps. Air monitoring results were below action levels and within normal limits.
- Current ERRS T&D Coordinator had his final day on site, and continued to brief his replacement.
- No samples were collected from Containment Cells today.
- Representatives from Alpine Evergreen arrived on site at approximately 1300 hours for an abbreviated tour of the site; they did not proceed into the stockpile area because of ongoing site operations.
- START performed data management tasks including updating the site equipment tracking spreadsheet, revising the checklist for equipment deployed at the six air stations, and downloading and processing XRF data collected to date.
- ERRS continued removing the fence separating Airport Auto Wrecking property and the landfill.

Monday, June 27

- ERRS continued to excavate in the landfill and transferred waste to Containment Cell 1.
- ERRS loaded waste from Containment Cell 8 into trucks and trailers for off-site disposal as non-

hazardous waste. A few rounds in the morning included intermodal containers in addition to the trucks and pups.
- START collected samples from Containment Cells 1 and 3 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- START shipped air samples for asbestos analysis; the samples were collected 6/24 and 6/25.
- START deployed time-lapse camera near Air Station 2 to collect a single day of site activities.
- 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.
- START screened Containment Cells 1, 2, 3, and 8 for radiation with the Ludlum 19; nothing was detected above background.
- ERRS finished removing the fence separating Airport Auto Wrecking property and the landfill with the exception of the metal posts which will be removed by the heavy equipment during targeted excavation of demolition debris.
- Additional ERRS personnel arrived on site to transition in as the new on site ERRS Response Manager.

Tuesday, June 28

- ERRS continued to excavate in the landfill and transferred waste to Containment Cell 8.
- ERRS loaded waste from Containment Cell 4 and 8 into trucks and trailers for off-site disposal as non-hazardous waste. Additionally, two bins of steel were transported off site.
- No soil samples were collected today.
- START deployed time-lapse camera near Air Station 2 to collect a single day of site activities. The time-lapse video collected from 6/27 was uploaded and can be accessed through a link on the main site profile page.
- 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.
- Staff from Waste Management arrived on site to meet with ERRS Transportation and disposal staff..
- USCG PST Executive Officer arrived on site along with a Dustrak particulate monitoring instrument to deploy alongside a DataRam.
- Preliminary data for one of the samples collected from Containment Cell 6 on 6/22 had elevated concentrations of lead (44 mg/L) which exceeded the TCLP limit of 5 mg/L. EPA was notified of the results, and ERRS began making preparations for transportation and disposal of the waste to RCRA Subtitle C facility in Arlington, OR.
- OSC Rodin and START engineer performed a site walk and noted that the sidewalls should be maintained at a height no greater than 5 feet high, per the excavation plan.

Wednesday, June 29

- ERRS continued to excavate in the landfill and transferred waste to Containment Cells 4 and 8.
- ERRS loaded waste from Containment Cells 4 and 5 into trucks and trailers for off-site disposal as non-hazardous waste. Additionally, tires were transported off site.
- START collected samples from Containment Cell 8 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- START shipped air samples for asbestos analysis; the samples were collected 6/27 and 6/28.
- START shipped air samples for lead analysis; the samples were collected 6/28.
- START deployed time-lapse camera near Air Station 2 to collect a single day of site activities.
- 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.
- All GES and most EQM personnel plan to demobilize from the site after today for the extended holiday weekend. Only 5 EQM personnel will be on site tomorrow.
- Two air samples collected for lead analysis on 6/21 indicated elevated concentrations, including one sample (58.4 ug/m3) from the stockpile spotter that exceeded the site action level (50 ug/m3). Site activities on the day in question including filling Containment Cell 6 which had an elevated sample that exceeded the TCLP action level for lead. OSC Rodin and OSC Parker met with START and ERRS to discuss the results and determine a plan of action which included upgrading to respiratory protection in modified Level C.
- START conducted weekly SWPPP inspection. No stormwater discharge from site, and water quality was monitored for pH and turbidity at Gorst Creek, downstream of Hwy 3 culvert.

Thursday, June 30

- ERRS loaded waste from Containment Cells 5 and 7 into trucks and trailers for off-site disposal as non-hazardous waste. Additionally, 23 tons of steel was transported off site.
- Only 5 EQM personnel on site. No excavation was conducted within landfill area.
- START collected samples from Containment Cell 4 for waste profile analysis; the samples were delivered to the laboratory via courier service.
- No excavation activity within landfill area today, only within stockpile area
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs at reduced number of stations, located only in active area of site within stockpile area, and collected air samples for metals and asbestos. Air monitoring results were below action levels and within normal limits.
- Air samples to be shipped to lab on 7/1/2016.
- Kitsap County Solid Waste personnel on-site today for site tour.
- EPA, EQM/ERRS, START, and PST to demob from site today for extended holiday weekend.

Activities resume and personnel on-site starting 7/6/2016.

2.2 Planning Section

Disposal

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

Progress

MATERIAL HAULED FROM LANDFILL TO STOCKPILE (Loads)

Day/Date	*Debris/Soil*	*Concrete*	*Steel*	*Tires*	*Debris/Soil Distribution*
Mon, June 20	97				Cell 4 - 34 loads, Cell 5 - 63 loads
Tue, June 21	57	13	5		Cell 5 - 11 loads, Cell 6 - 46 loads
Wed, June 22	85				Cell 6 - 47 loads, Cell 7 - 38 loads
Thu, June 23	89	1			Cell 7 - 61 loads, Cell 2 - 28 loads
Fri, June 24	102				Cell 2 - 63 loads, Cell 3 - 39 loads
Sat, June 25	59	8			Cell 3 - 52 loads, Cell 1 - 7 loads
Mon, June 27	78				Cell 1 - 78 loads
Tue, June 28	84		3		Cell 8 - 84 loads
Wed, June 29	75	6			Cell 8 -7, Cell 4 - 68
Thu, June 30	No activity				
Fri, July 1	No activity				
Sat, July 2	No activity				
Subtotal for Reporting Period	582	20	10		

MATERIAL HAULTED OFF-SITE FROM STOCKPILE TO LANDFILL OR RECYCLING FACILITY (Tons)

Day/Date	*Debris/Soil*	*Loads of Debris/Soil*	*Concrete*	*Steel*	*Tires*	*Notes*
Mon, June 20	1,473.48	44		17.64		
Tue, June 21	1,636.41	48				
Wed,June 22	1,719.59	50		17.30		

Thu, June 23	1,732.94	51				
Fri, June 24	1,715.62	51				
Sat, June 25	1,364.35	41				
Mon,June 27	1,757.91	54				
Tue, June 28	1,658.65	52		20.65		
Wed, June 29	1660.90	52			33.56	
Thu, June 30	2,141.61	66		23.10		
Fri, July 1	no activity					
Sat, July 2	no activity					
Subtotal for Reporting Period	16,861.46	506		78.69	33.56	
Subtotal for All Previous Reporting Periods	19,961.81	614		109.81	79.13	
Total Material Hauled Off Site	36,823.27	1120		188.50	112.69	

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

For the week of June 6 - 11:

EPA	1-2
USCG	3-4
START	4-6
ERRS	18

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

Link for time lapse videos from the Gorst Removal Site:

https://vimeo.com/user54097859

6.2 Reporting Schedule

Currently Every 2 weeks

7. Situational Reference Materials

No information available at this time.