

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 #7
Progress. Excavation continues, and off site disposal
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffrey Rodin, OSC
Date: 7/6/2016
Reporting Period: July 3 - July 16, 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).

GCL 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/Tuesday, July 4-5

No on site activity.

Wednesday, July 6

- EPA, USCG, ERRS, and START were back on site after the holiday break.
- ERRS loaded three trucks and trailers with hazardous waste (lead) from Containment Cell 6C for off-site transportation and disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7 and then began to load out of Containment Cell 8.
- ERRS began to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate in the landfill, finished loading waste into Containment Cell 4, and then began to fill Containment Cell 5.
- ERRS began to excavate landfill waste along northern property boundary onto the Airport Auto Wrecking property.
- PPE at the site was upgraded to Level C (half-face respirators and P-100 cartridges) because of the potential for airborne lead exposure. Site workers will continue to use full-face respirators with P100 cartridges until half-face respirators arrive at the site and fit tests are performed.
- 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.
- Off-site laboratory results were received for asbestos and lead air samples collected the previous week; all results were below site action levels.
- START submitted a 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.

Thursday, July 7

- ERRS loaded 4 trucks and trailers with hazardous waste (lead) from Containment Cell 6C for off-site transportation and disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS continued to excavate waste from the landfill, including on the Airport Auto Wrecking property to the north. The waste was transferred into Containment Cell 5 until it was full and then into Containment Cell 7.
- START collected three composite samples from Containment Cell 5, which were delivered to the off-site laboratory by private courier.
- ERRS continued to load-out concrete for transportation to a local recycler.
- EPA, ERRS, and START had a winter operations strategy meeting to begin to develop plans for limited site operations and stabilizing the site over the winter.
- An electronic personal dosimeter (EPD) worn by one of the workers in the landfill sounded an alarm. The area was surveyed by START and the USCG with a Ludlum 19, a Ludlum 2241-2, and a RAE gamma ray detector. All readings were at background levels.
- START continued to perform air monitoring with AreaRAEs, MultiRAEs, and DataRAMs, and air monitoring results were below action levels and within normal limits.
- START developed a new site air sampling schedule to balance monitoring needs for potential exposures to lead and asbestos, and the plan was accepted by EPA and ERRS. Each day, 10 air samples will be collected throughout the site, including ambient samples from the six fixed air station locations. Additionally, four personal samples will be collected from two workers in the landfill (one operator and one ground spotter) and two workers in the stockpile area (one operator and one ground spotter). On each day, half of the fixed and personal samples will be collected for asbestos and half will be collected for lead, and the analyses at each location will alternate between asbestos and lead on subsequent days. START began to collect air samples for asbestos and lead following this strategy today.

- Two cylinders were discovered in the landfill and were moved to the cylinder staging area.
- EPA, ERRS, and the USCG reviewed the current decon line at the stockpile area and developed a plan to move it to a more functional location.
- EPA and START created a dedicated video hosting site for the removal action and updated the video links on the site's website.

Friday, July 8

- ERRS loaded 4 trucks and trailers with hazardous waste (lead) from Containment Cell 6C for off-site disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 1 and then began to load out of Containment Cell 2.
- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill and from the Airport Auto Wrecking property. The landfill waste was loaded into Containment Cell 7 and then Containment Cell 8.
- START collected three composite samples of the landfill waste in Containment Cell 7. The samples were sent to the off-site laboratory by private courier.
- ERRS moved the decon line between the stockpile and break areas per the plan developed yesterday.
- One acetylene cylinder was recovered in the landfill and then stored in the cylinder staging area.
- There were two groups of visitors to the site today. In the morning, a group of EPA Region 10 managers toured the site. In the afternoon, representatives of the South Kitsap, Bremerton, and US Navy NW Region Fire Departments visited the site to observe the site's health and safety monitoring procedures and to coordinate with EPA in the event of an emergency incident.
- START developed an initial outline of sampling approach for post-excavation sample.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos and lead. Except as noted below, air monitoring results were below action levels and within normal limits.
- Several AreaRAEs reported brief peaks above action levels; START and the USCG inspected the areas with MultiRAEs and UltraRAEs, and readings were normal. The AreaRAE units with the false positives were briefly pulled from the site for re-calibration.
- START performed a stormwater inspection following rain overnight and this morning. No discharge from the site was observed.
- ERRS found a leaking bag in the landfill with an oily substance. The material and some soil that was in contact with it was placed into a drum liner and isolated.

Saturday, July 9

- No hazardous waste from Stockpile 6C was sent off-site for disposal today because of the weekend.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 2.
- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill and from the Airport Auto Wrecking property. The landfill waste was loaded into Containment Cell 8 and then Containment Cell 1.
- START performed haz-cat testing on the oily material isolated the previous afternoon. The results indicated a corrosive material (pH of 1). ERRS neutralized and solidified the material and then placed with regular landfill waste in the stockpile area.
- 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.

Monday, July 11

- ERRS loaded 4 trucks and trailers with hazardous waste (lead) from Containment Cell 6C for off-site disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 2 and then began to load out of Containment Cell 3.
- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill and from the Airport Auto Wrecking property. Containment Cell 1 was filled with landfill waste, and then ERRS started to fill Containment Cell 2.
- START collected three composite samples of landfill waste each from Containment Cells 8 and 1. The samples were sent to the off-site laboratory by private courier.
- EPA, ERRS, and START conducted a site walk and meeting for prospective geotechnical engineering subcontractors.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos and lead. Except as noted below, air monitoring results were below action levels and within normal limits.

- START and USCG investigated an alarm from an Electronic Personal Dosimeter (EPD). Readings with the Ludlum radiation instruments were at normal (i.e., background).
- START shipped air samples from the previous week for lead and asbestos analyses to the respective off-site laboratories.
- The USCG mobilized a new DustTrack particular monitor to the site and began to set it up and deploy it by running it besides DataRAM dust monitors at site air monitoring stations.

Tuesday, July 12

- ERRS loaded 4 trucks and trailers with hazardous waste (lead) from Containment Cell 6C for off-site disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 3 and then began to load out of Containment Cell 4.
- ERRS continued to load-out concrete for transportation to a local recycler.
- Two bins of steel were sent off site for recycling.
- ERRS continued to excavate landfill waste from the center of the landfill and from the Airport Auto Wrecking property. Containment Cell 2 was filled with landfill waste, and then ERRS started to fill Containment Cell 3.
- START collected three composite samples of landfill waste from Containment Cell 2. The samples were sent to the off-site laboratory by private courier.
- 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.
- ERRS received a shipment of half-face respirators and P100 cartridges and began to deploy them and perform fit testing on the crew.
- START performed an XRF survey for metals (in particular, lead) at the bottom of the excavation area at the NW corner of the landfill and below the gravel road on Airport Auto Wrecking. The results of the excavation base material ranged from non-detect (less than 3 ppm) to 48 ppm for lead.
- START submitted a 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.

Wednesday, July 13

- ERRS loaded the final 4 trucks and trailers with the remainder of the hazardous waste (lead) from Containment Cell 6C for off-site disposal at Chemical Waste Management in Arlington, Oregon.
- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 4.
- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill and from the Airport Auto Wrecking property into Containment Cell 3.
- START collected three composite samples of landfill waste from Containment Cell 3. The samples were sent to the off-site laboratory by private courier.
- 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.

Thursday, July 14

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal. ERRS finished loading out from Containment Cell 4 today, and then load-out began from Containment Cell 5.
- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill and placed the waste into Containment Cell 4. On the Airport Auto Wrecking property, ERRS finished excavating the area under the gravel access road at the northwest corner of the Airport Auto Wrecking property, and START collected post-excavation samples for metals and PCBs from the floor and walls of the excavation area.
- 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.
- Results for the most recent batch of lead air samples were received from the lab. All results were well below the site action level.
- EPA and START participated in a conference call with Washington Department of Fish and Wildlife and the Suquamish Tribe to discuss comments on the 90% stream restoration design.
- START shipped air samples from earlier in the week for lead and asbestos analyses to the respective off-site laboratories.

Friday, July 15

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal. Containment Cell 5 was

finished today, and then load-out began from the non-hazardous portion of Containment Cell 6 (A&B).

- ERRS continued to load-out concrete for transportation to a local recycler.
- ERRS continued to excavate landfill waste from the center of the landfill. Excavation also continued along the northwest property boundary with Airport Auto Wrecking toward the southeast. Landfill waste was hauled and placed into Containment Cell 4.
- START collected three composite samples of landfill waste from Containment Cell 4. The samples were sent to the off-site laboratory by private courier.
- 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.
- Results for the last batch of asbestos air samples were received from the lab. All results were below the site action level.

Saturday, July 15

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cells 6, 7, and 8. The remaining waste in Cell 6 was removed today, leaving it empty.
- ERRS continued to excavate landfill waste from the center of the landfill. Excavation also continued along the northwest property boundary with Airport Auto Wrecking toward the southeast. Landfill waste was hauled and placed into Containment Cell 5.
- 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.
- Air Station 2, which is on the northeast property boundary with Airport Auto Wrecking, was moved to the northwest because of ongoing landfill waste excavation.
- 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

MATERIAL HAULED FROM LANDFILL TO STOCKPILE (Loads)

<i>Day/Date</i>	<i>Debris/Soil</i>	<i>Concrete</i>	<i>Steel</i>	<i>Tires</i>	<i>Debris/Soil Distribution</i>
Mon, July 4	No activity				
Tue, July 5	No Activity				
Wed, July 6	76				Cell 4 - 21 Loads, Cell 5 - 55 loads
Thu, July 7	88		1		Cell 5 - 23 loads, Cell 7 - 65 loads
Fri, July 8	71		1		Cell 7 - 27 loads, Cell 8 - 44 loads
Sat, July 9	92	1			Cell 8 - 58 loads, Cell 1 - 34 loads
Mon, July 11	91				Cell 1 - 59 loads, Cell 2 - 32 loads
Tue, July 12	75		1		Cell 2 - 59 loads, Cell 3 - 6 loads
Wed, July 13	68	8	1		Cell 3- 68 loads
Thu, July 14	66	3	1		Cell 3 - 6 loads, Cell 4 - 60 Loads
Fri, July 15	40	8	2	1	Cell 4 - 21 loads, Cell 5 - 19 loads
Sat, July 16	61	8			Cell 5 - 61 Loads

Subtotal for Reporting Period	728	28	7	1	
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MATERIAL HAULED OFF-SITE FROM STOCKPILE TO LANDFILL OR RECYCLING FACILITY (Tons)

Day/Date	Non-Hazardous Debris/Soil	Loads of Non-Hazardous Debris/Soil	Hazardous Debris/Soil	Loads of Hazardous Debris/Soil	Concrete	Steel	Tires	Notes
Mon, July 4	No Activity							
Tue, July 5	No Activity							
Wed, July 6	1,580.18	50	91.84	3	148.76			
Thu, July 7	2,013.06	63	121.37	4	141.76			
Fri, July 8	2,011.61	63	126.77	4	161.76			
Sat, July 9	1,051.15	35			135.43			
Mon, July 11	1,412.11	45	125.60	4	168.52			
Tue, July 12	1,601.80	49	119.22	4	154.31	23.74		
Wed, July 13	1,432.85	43	121.88	4	149.06			
Thu, July 14	1,418.59	44			152.19			
Fri, July 15	1,339.76	41			141.26			
Sat, July 16	1,140.03	37						
Subtotal for Reporting Period	15,001.14	470	706.68	23	1,353.07	23.74		
Subtotal for All Previous Reporting Periods	36,776.72	1124	246.82	8	0	188.50	112.69	
Total Material Hauled Off Site	51,777.86	1594	953.50	31	1,353.07	212.24	112.69	

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

EPA received initial payment under AOC of \$24.8 million.

- The AOC has unique reporting requirements due to DOJ and Judgement Fund requirements.
- EPA must provide DOJ periodic progress reports, cost accounting and revised cost estimates.

Budget/Financial tracking and burn rate will be tracked separately outside of POLREP system.

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 period of July 6 - 16:

EPA	1-3
USCG	3
START	3-4
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>

Links for time lapse videos from the Gorst Removal Site:

<https://vimeo.com/user54097859>

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

POLREP #7 Last Updated 7/18/2016