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 #8**
Progress - Continued Excavation and Disposal
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 7/31/2016
Reporting Period: 7/18-2016 - 7/30/2016

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, July 18

● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7.
● ERRS began to load-out concrete for transportation to a local recycler.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 6.
● START & USCG collected three composite samples from Containment Cell 5, which were delivered to the off-site laboratory by private courier.
● START shipped air samples from the previous week for lead and asbestos analyses to the respective off-site laboratories.
● START & USCG 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.
● START and USCG moved Camera 3 from the EPA command post to a power pole located closer to the ERRS break area to collect time lapse footage of stockpile operations.
● 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.

Tuesday, July 19

● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7, and then began to load-out Containment Cell 8.
● ERRS continued to load-out concrete, steel and tires for transportation to local facilities for recycling.
● ERRS continued to excavate in the landfill and load waste into Containment Cells 6 and 7.
● START & USCG collected three composite samples from Containment Cell 6, which were delivered to the off-site laboratory by private courier.
● START & USCG 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.
● START and USCG deployed Camera 4 to a power pole located closer to the ERRS break area to collect time lapse footage of stockpile operations.
● Air Station 2, which is on the property boundary with Airport Auto Wrecking (AAW), was moved to the west to optimize its location related to AAW and excavation activities on the landfill.
● Off-site laboratory results were received for asbestos and lead air samples collected the previous week; all results were below site action levels.

Wednesday, July 20

● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 8 and then began to load out of Containment Cell 1.
● ERRS continued to load-out concrete for transportation to a local recycler.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 7.
● START & USCG 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.
● START recovered Camera 4 (deployed the previous day) to confirm that the orientation was sufficient; the camera was downloaded then redeployed at the same location.
● A scissor-lift arrived on site to assist during load-out of intermodal containers. The stockpile spotter will have an improved vantage for communication with the excavator operator.
● EPA, START, ERRS and USCG visited the Kitsap Reclamation and Materials facility to observe concrete recycling operations.
● Off-site laboratory results were received for soil samples collected the previous week; all results were below site action levels.

Thursday, July 21

● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 1.
● ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
● ERRS continued to excavate in the landfill and load waste into Containment Cells 7 and 8.
● START collected three composite samples from Containment Cell 7, which were delivered to the off-site laboratory by private courier.
● START shipped air samples collected earlier this week for lead and asbestos analyses to the respective off-site laboratories.
● START & USCG 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, START, ERRS and USCG performed early morning site walk of Airport Auto Wrecking Property (AAW) to assess the next phase of sampling for post-excavation confirmation analysis.
● START & USCG collected four composite post-excavation confirmation samples from AAW.
● Off-site laboratory results were received for post-excavation confirmation samples collected in the western section of AAW. The results are less than the proposed screening levels for the site.

● START collected GPS coordinates of select locations in the landfill, including the lowest excavated depth to date.
● Off-site laboratory results were received for soil samples and asbestos and lead air samples collected the previous week; all results were below site action levels.

Friday, July 22
● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 1, and then began to load-out Containment Cell 2.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 8, then Containment Cell 1.
● START performed a weekly stormwater inspection following overnight rainstorm. No discharge from the site was observed.
● START & USCG collected three composite samples from Containment Cell 8, which were delivered to the off-site laboratory by private courier. The courier also transported the four composite samples collected the previous day from AAW.
● START & USCG 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.
● START and USCG investigated an alarm from an Electronic Personal Dosimeter (EPD) in Containment Cell 2. Readings with the Ludlum radiation instruments were at normal (i.e., background).
● START prepared a schedule of generator maintenance due to heavy usage, approximately 70-80 hours per week. A local small-engine mechanic has been performing tune-ups and repairs on the generators.

Saturday, July 23
● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cells 2, 3 and part of 5.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 1.
● START & USCG 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 and START identified potential locations for time-lapse camera at the face of the landfill.
● START and USCG investigated an alarm from an Electronic Personal Dosimeter (EPD) in the landfill. Readings with the Ludlum radiation instruments were at normal (i.e., background).

Monday, July 25
● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 2, and then began to load-out Containment Cell 3.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 2.
● START and USCG collected three composite samples from Containment Cell 1, which were delivered to the off-site laboratory by private courier.
● START and USCG 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 received four MultiRae Pros and an AutoRae automated calibration system, including one controller and eight cradles. The new MultiRae Pros and AutoRae system will reduce the level of effort required to perform daily/weekly bump checks and calibrations.
● EPA submitted 90 day Progress Report of site operations.
● START provided ERRS with revised area calculations for stockpile area settling ponds.
● 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.

Tuesday, July 26
● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 3, and then began to load-out Containment Cell 4.
● ERRS continued to load out steel for transportation to a local facility for recycling.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 3.
● START and USCG collected three composite samples from Containment Cell 2, which were delivered to the off-site laboratory by private courier.
● START and USCG 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 deployed a break station in the borrow source area as a place for personnel working in the landfill to rehydrate and cool down under a shaded tent.

Wednesday, July 27
● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 4.
● ERRS continued to load-out steel for transportation to a local recycler.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 3.
● START and USCG collected three composite samples from Containment Cell 3, which were delivered to the off-site laboratory by private courier.
● START and USCG 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.
● START deployed Camera 4 near the lower face of the landfill in order to document site activities as the landfill is excavated and ultimately restored.
● In the late morning, a group from the Kitsap County Solid Waste Advisory Group arrived on site for a briefing and site walk led by OSC Rodin.

Thursday, July 28
● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 5.
● ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 4.
● START shipped air samples collected earlier this week for lead and asbestos analyses to the respective off-site laboratories. A Viper Linc was also shipped off site for troubleshooting by the manufacturer.

● START and USCG 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.
● START collected GPS coordinates of select locations in the landfill, including the lowest excavated depth to date.
● START assessed the orientation and angle of Camera 4 deployed the previous day near the lower face of the landfill. The camera was downloaded and redeployed.
● Geotechnical bids for slope stability were reviewed.

Friday, July 29
● ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 5, and then began to load-out Containment Cell 6.
● ERRS continued to load-out concrete for transportation to local facilities for recycling.
● ERRS continued to excavate in the landfill and load waste into Containment Cell 4, then Containment Cell 5.
● START and USCG collected three composite samples from Containment Cell 4, which were delivered to the off-site laboratory by private courier.
● START and USCG 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.
● START and USCG investigated an alarm from an Electronic Personal Dosimeter (EPD) in the landfill. Readings with the Ludlum radiation instruments were at normal (i.e., background).

Saturday, July 30
● ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cells 6 and 8. No excavation activities were performed in the landfill.
● START and USCG 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 Stations 1 and 2 were off-line today because no operations were performed in the landfill.
● ERRS cleared vegetation at the base of the landfill (downstream side) to improve the view of the time-lapse camera. This area will eventually be cleared as part of landfill excavation. ERRS also performed maintenance on the footpath leading down to base of the landfill.
● ERRS performed maintenance on the haul road leading off site.
● START submitted a draft Post Excavation SSSP to OSC Rodin and OSC Parker for review.
● START engineer performed weekly SWPPP inspection. No discharge off site was observed this week.
● A representative from Kitsap County Public Health arrived on site to meet with OSC Rodin.

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, July 18	52	14		1	Cell 6 - 52 Loads
Tue, July 19	73	4	4		Cell 6 - 40 Loads, Cell 7 - 33 loads
Wed, July 20	62	19			Cell 7 - 62 loads
Thu, July 21	85	10	1		Cell 7 - 19 loads, Cell 8 - 66 loads
Fri, July 22	75	11		1	Cell 8 - 43 loads, Cell 1 - 32
Sat, July 23	22	13			Cell 1 - 60 loads
Mon, July 25	68	9			Cell 2 - 68 loads
Tue, July 26	66	1	4		Cell 2 - 26 loads, Cell 3 - 40 loads
Wed, July 27	64	3	4		Cell 3 - 62 loads, Cell 4 - 2 loads
Thu, July 28	60		4		Cell4 - 60 loads
Fri, July 29	61	15			Cell 4-31 loads, Cell 5 30
Sat, July 30					No landfill excavation activities.

Subtotal for Reporting Period	**726**	**99**	**17**	**2**	

MATERIAL HAULTED 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 18	1,742.59	51			146.79			
Tue, July 19	1,649.94	48			131.11	12.32	25.70	
Wed,July 20	1,745.87	52			267.10			
Thu, July 21	1,745.03	51			257.29	14.42		
Fri, July 22	1,795.73	54						
Sat, July 23	702.31	22						
Mon, July 25	1,967.56	61						
Tue, July 26	1,716.72	52				20.83		
Wed, July 27	1,332.07	41				15.98		
Thu, July 28	1,520.84	46			107.79	16.42		
Fri, July 29	1,299.73	39			185.64			
Sat, July	916.27	29						
Subtotal for Reporting Period	**18,135.06**	***546***			**1,095.72**	***79.97***	***25.70***	
Subtotal for All Previous Reporting Periods	**51,777.86**	**1,594**	**953.50**	**31**	**1,353.07**	**212.24**	**112.69**	
Total Material Hauled Off Site	**69,912.92**	**2,140**	**953.50**	**31**	**2,448.79**	**292.21**	**138.39**	

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 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.