

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 #9**
Continued Excavation, Transportation and Disposal
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 8/1/2016
Reporting Period: 8/1/2016 - 8/13/2016

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, August 1

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 5.
- ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
- START and USCG collected three composite samples from Containment Cell 5, 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 shipped air samples collected during the previous week for lead and asbestos analyses to the respective off-site laboratories.
- 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, August 2

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 6.
- ERRS continued to load out concrete and steel for transportation to local facilities for recycling.
- START identified three post-excavation decision units PE08 – PE10 and performed in-situ screening at 10 locations within each DU. The coordinates of the DU boundaries were collected with a GPS unit.
- 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.
- A time-lapse camera was deployed in the landfill near Air Station 2 for a single day of photographs at a frequency of 1 picture per 10 seconds.
- EPA OSC Rodin and OSC Parker approved the Post-Excavation Site Specific Sampling Plan (SSSP).
- Off-site laboratory results were received for lead air samples collected from July 21 to 26; all results were below site action levels.

Wednesday, August 3

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 8.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 7.
- ERRS continued to load out concrete and steel for transportation to local facilities for recycling.
- START and USCG collected three composite samples from Containment Cell 6, which were delivered to the off-site laboratory by private courier.
- START collected one composite soil sample each from post-excavation decision units PE08 – PE10.
- 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.
- Vegetation was removed from around the upstream culvert grate, and then marked with a high-visibility orange flag.
- ERRS worked to expand the settling pond located in the stockpile area.
- START performed weekly SWPPP inspection.
- Off-site laboratory results were received for asbestos air samples collected from July 21 to 26; all results were below site action levels.

Thursday, August 4

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 8, and then began to load-out Containment Cell 1.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 7.
- ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
- START and USCG collected three composite samples from Containment Cell 7, 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.
- An ERRS excavator operator reported a suspect container in the landfill. EPA, START, and ERRS assessed the container using the Ludlum Model 19 and MultiRae Pro multi-gas meter, and no readings were observed above background levels. The container was determined to be full of concrete and metal.
- A bear was encountered by START and USCG during the daily SWPPP inspection downstream of the culvert under Hwy 3. In response, all personnel in the ravines were directed to carry bear spray and always be accompanied by at least one other person. Until otherwise directed, no personnel should be downstream of the Hwy 3 culvert.

Friday, August 5

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 1.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 8.
- ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
- 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 ERRS confirmed the methods and turn-around times for post-excavation soil samples collected from DUs PE08 – PE10, and the samples were delivered to the off-site laboratory by private courier.
- OSC Parker directed START to perform additional in-situ XRF screening at AAW property in PE04.
- A time-lapse camera was deployed in the landfill near Containment Cell 8 for a single day of photographs at a frequency of 1 picture per 10 seconds.

Saturday, August 6

- 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 3.
- ERRS continued to excavate in the landfill and finished loading waste into Containment Cell 8, then began filling Containment Cell 1.
- A time-lapse camera was deployed in the landfill near Containment Cell 8 for a single day of photographs at a frequency of 1 picture per 10 seconds.
- ERRS excavated a small volume of lead-contaminated soil from AAW PE04.
- The geotechnical subcontract was approved, and an initial site walk planned for the following week.

Monday, August 8

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 3.
- ERRS loaded five trucks and trailers with hazardous waste from Containment Cell 2, section A, for direct haul to the Waste Management Subtitle C disposal facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 1.
- ERRS continued to load-out concrete for transportation to a local facility for recycling.
- START and USCG collected three composite samples from Containment Cell 8, 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 downloaded two time-lapse video cameras, including one near Air Station 1 and another from the base of the landfill.
- 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.
- Off-site laboratory results were received for asbestos air samples collected from August 4 to 5; all results were below site action levels.

Tuesday, August 9

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 3, then began loading out Containment Cell 4.
- ERRS loaded seven trucks and trailers with hazardous waste from Containment Cell 2, section A, for direct haul to the Waste Management Subtitle C disposal facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 3.
- ERRS continued to load-out concrete for transportation to a local facility for recycling.
- 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.
- START performed weekly SWPPP inspection.
- Off-site laboratory results were received for lead air samples collected from August 1 to 3; all results were below site action levels.

Wednesday, August 10

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 4.
- ERRS loaded six trucks and trailers with hazardous waste from Containment Cell 2, section A, for direct haul to the Waste Management Subtitle C disposal facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 3.

- ERRS continued to load out concrete for transportation to a local facility for recycling.
- 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 shipped air samples collected from August 6 – 9 for lead and asbestos analyses to the respective off-site laboratories.
- START identified three post-excavation decision units PE11 – PE13 and performed in-situ screening at 10 locations within each DU. The coordinates of the DU boundaries were collected with a GPS unit. An area with elevated lead concentrations near the MTCA unrestricted action level of 250 mg/kg was identified along the border of PE12 and PE13. This hot spot was marked with orange paint.

Thursday, August 11

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 5.
- ERRS loaded six trucks and trailers with hazardous waste from Containment Cell 2, section A, for direct haul to the Waste Management Subtitle C disposal facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 4.
- ERRS continued to load-out concrete and steel for transportation to local facilities for recycling.
- START and USCG collected three composite samples from Containment Cell 4, which were delivered to the off-site laboratory by private courier.
- START collected one composite soil sample each from post-excavation decision units PE11 – PE13.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos and lead. USCG also began deploying both DustTraks air particulate monitors to compare to DataRAM particulate monitors. Air monitoring results were below action levels and within normal limits.
- ERRS contacted the laboratory to discuss the status of delayed PCB results for a number of samples, including PE08 – PE10 confirmation samples submitted the previous week.
- Two representatives from geotechnical subcontractors, arrived on site to meet with EPA, ERRS and START to discuss the scope of work regarding slope stability and backfill requirements. Following the meeting, the group took a tour of the site which included soil samples for geotechnical analysis including Proctor compaction and grain size.

Friday, August 12

- 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 loaded one truck and trailer with hazardous waste from Containment Cell 2, section A, for direct haul to the Waste Management Subtitle C disposal facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 5.
- ERRS continued to load-out concrete for transportation to a local facility for recycling.
- 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.
- Samples collected from post-excavation decision units PE11 – PE13 were delivered to the off-site laboratory by private courier.
- A group photo was collected of all site workers at the entrance to the stockpile area.
- START engineer identified a survey control point near the entrance to AAW property, and collected GPS coordinates at this location for use as a fixed reference location.
- EPA, ERRS, and START met to discuss the reconstruction of settling pond in the western corner of AAW property.
- Off-site laboratory results were received for asbestos air samples collected from August 6 to 9; all results were below site action levels.

Saturday, August 13

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 6.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 5.
- START engineer collected GPS coordinates at AAW property to assess consistency of GPS collection over time.
- Off-site laboratory results were received for lead air samples collected from August 4 to 5; all results were below site action levels.

- START prepared to ship air samples collected earlier this week for lead and asbestos analyses to the respective off-site laboratories.

- START downloaded XRF results from the previous week to compare to reference standards and method detection limits, and submit to START chemist for validation.

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, Aug 1	72		7		Cell 5 - 52 loads, Cell 6 - 20 loads
Tue, Aug 2	76	7			Cell 6 - 76 loads
Wed, Aug 3	56	22		1	Cell 7 - 56 loads
Thu, Aug 4	40	11	5	1	Cell 7 - 40 loads
Fri, Aug 5	80		1		Cell 7 - 3 loads, Cell 8 - 77 loads
Sat, Aug 6	64	10			Cell 8 - 33 loads, Cell 1 - 31 loads
Mon, Aug 8	74	9			Cell 1 - 74 loads
Tue, Aug 9	47	8	6	1	Cell 3 - 47 loads
Wed, Aug 10	62	4			Cell 3 - 55 loads, Cell 4 - 7 loads
Thu, Aug 11	81	1	1		Cell 4 - 81 loads
Fri, Aug 12	44	14			Cell 4 - 10 loads, Cell5 34 loads
Sat, Aug 13	62		3		Cell 5 - 62 loads .
Subtotal for Reporting Period	758	86	23	3	

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, Aug 1	1,600.57	50			130.39	13.22		
Tue, Aug 2	1,762.72	54			163.34	20.51		

Wed, Aug 3	1,202.32	36			143.56	17.54		
Thu, Aug 4	1,694.02	51			134.81	18.91		
Fri, Aug 5	1,424.66	43			235.23	19.70		
Sat, Aug 6	1,778.94	53						
Mon, Aug 8	1,185.33	36	160.38	5	129.70			
Tue, Aug 9	1,343.47	40	218.73	7	121.40	18.48		
Wed, Aug 10	1,727.64	51	183.28	6	185.78			
Thu, Aug 11	1,815.35	54	222.48	6	185.09	16.86		
Fri, Aug 12	1,637.83	51	32.25	1	201.97			
Sat, Aug 13	1,085.63	33						
Subtotal for Reporting Period	18,258.48	552	817.12	25	1,501.57	125.22		
Subtotal for All Previous Reporting Periods	69,912.92	2,190	953.50	36	2,448.79	292.21	138.39	
Total Material Hauled Off Site	88,171.40	2,742	1,770.62	61	3,940.36	417.43	138.39	

Total Off Site Disposal/Recycling to Date: 94,441.2 Tons

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 to 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 Fisheries Service and USFWS, 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.