

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 #10  
Excavation Continues. Off site Transportation & Disposal  
Bremerton Auto Wrecking - Gorst Creek Site  
10GL  
Port Orchard, WA  
Latitude: 47.5099832 Longitude: -122.7405453

**To:**  
**From:** Jeffry Rodin, OSC  
**Date:** 8/15/2016  
**Reporting Period:** 8/15/2016 - 8/27/2016

1. Introduction

1.1 Background

<b>Site Number:</b>	10GL	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	1/20/2016
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Non-Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/11/2016	<b>Start Date:</b>	
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	WAN001002414	<b>RCRIS ID:</b>	WAH000048636
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

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 15**

- 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 6.
- ERRS continued to load-out concrete for transportation to a local facility 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, DataRAMs, and DustTraks 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 10 – 13 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 16**

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 7, then began loading out Containment Cell 8.
- ERRS continued to excavate in the landfill and load waste into Containment Cells 6 and 7.
- ERRS continued to load-out concrete, steel, and tires 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 and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- START compared particulate monitoring results between the DataRAMs and DustTraks; a total of two DustTraks provided by the USCG are deployed on site and two additional monitors are in transit.
- EPA and START discussed the draft STORM (Seasonal Temporary Operations Reduction Management) Plan for winter operations on site.
- EPA, START, and ERRS discussed grading at AAW property.
- Off-site laboratory results were received for asbestos air samples collected from August 10 to 13; all results were below site action levels.

##### **Wednesday, August 17**

- 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 steel for transportation to a local facility for recycling.
- START prepared conceptual grading plan for northwest corner of the site near AAW property.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- EPA and START discussed revisions to the formatting of time-lapse videos.
- EPA requested ERRS install additional fencing and signage near AAW property to discourage unauthorized access to the site.
- ERRS contacted the lab for additional details regarding the continued delay for pesticide results from post-excavation confirmation samples.
- Off-site laboratory results were received for lead air samples collected from August 6 to 9; all results were below site action levels.

##### **Thursday, August 18**

- ERRS finished loading trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 8, then began loading out Containment Cell 1.
- ERRS continued to excavate in the landfill and load waste into Containment Cells 7 and 8.
- ERRS continued to load-out steel for transportation to a local facility 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, DataRAMs, and DustTraks 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 15 - 17 for lead and asbestos analyses to the respective off-site laboratories.

##### **Friday, August 19**

- 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 2B/2C.

- ERRS continued to excavate in the landfill and load waste into Containment Cells 8 and 1.
  - 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, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
  - START downloaded construction cameras located at Air Station 3 and the base of the landfill.
  - START deployed a construction camera on top of Containment Cell 7 for a brief (1-4 day) collection of site activities in the stockpile area near Containment Cells 1 and 2.
  - One representative from, geotechnical subcontractor, arrived on site with a nuclear density gauge to collect in-place compaction readings in areas identified for post-excavation sampling in the landfill.
  - START continued work on the draft STORM Plan for winter operations on site.
  - Off-site laboratory results were received for lead air samples collected from August 10 to 13, and for asbestos air samples collected from August 15 to 17; all results for both lead and asbestos were below site action levels.
  - No work is scheduled for tomorrow due to the inability of the Transfer Facility to accept waste this Saturday.
- As of this week, over **100,000 tons** of material has been shipped off site.

#### **Monday, August 22**

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 2.
- ERRS continued to excavate in the landfill and load waste into Containment Cell 1.
- Excavation began at the upstream edge of the landfill, above the culvert inlet.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- The site received two additional USCG PST DustTrak monitors for use on site.
- 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 23**

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 3.
- ERRS continued to excavate in the landfill; Containment Cell 1 was filled, and ERRS began to load waste into Containment Cell 2.
- ERRS sent a load of steel off site for recycling.
- START shipped air samples collected from August 18, 19, and 22 for lead and asbestos analyses to the respective off-site laboratories.
- START collected three composite samples from Containment Cell 1. START also collected a composite baseline sample from the potential borrow source to the east of the stockpile area. All four samples were delivered to the off-site laboratory by private courier.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- START ordered additional batteries for the DustTrak dust monitors from an online vendor.

#### **Wednesday, August 24**

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal. Containment Cell 3 was emptied, and then load-out began from Containment Cell 4.
- ERRS continued to excavate in the landfill; Containment Cell 2 was filled, and ERRS began to load waste into Containment Cell 3.
- ERRS sent a load of tires off site for recycling.
- START collected three composite samples from Containment Cell 2, and the samples were delivered to the off-site laboratory by private courier.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- Off-site laboratory results were received for asbestos air samples collected from August 18, 19, and 22 and lead air samples collected from August 15 to 17; all results were below site action levels.
- The OSC and START reviewed the final data from post-excavation samples collected on the Airport Auto Wrecking property. The results indicate no exceedance of upland screening levels (other than naturally elevated arsenic), which indicates that these areas can be backfilled.
- ERRS discovered a drum filled with some type of resin in the landfill; START and PST assessed it and collected a sample for haz-cat testing. The haz-cat results were negative, but air monitoring of the sample jar head space indicated the presence of benzene. The drum and contents were placed into a salvage drum.
- Unauthorized visitors tried to enter the site today and evaded site personnel. The property owner, local officials, and the night security guards were alerted.

#### **Thursday, August 25**

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal. Containment Cell 4 was emptied, and then load-out began from Containment Cell 5.
- ERRS continued to excavate in the landfill; Containment Cell 3 was filled, and ERRS began to load waste into Containment Cell 4.
- ERRS sent a load of steel off site for recycling.
- START collected three composite samples from Containment Cell 3, and the samples were delivered to the off-site laboratory by private courier.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks 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 23-24 for lead and asbestos analyses to the respective off-site laboratories.
- START collected a sample for TCLP VOCs analysis from the drum of resin found the day before. ERRS secured the drum in an overpack container pending the results.
- The fencing subcontractor was on site to meet with ERRS and to plan for the reconstruction of the Airport Auto

Wrecking fence after backfill.

- START completed the draft Site Temporary Operations Reduction Management (STORM) plan and submitted it to the OSC for review.

**Friday, August 26**

- ERRS loaded trucks and trailers with non-hazardous waste for off-site transportation and disposal from Containment Cell 5.
- ERRS continued to excavate in the landfill and loaded the waste into Containment Cell 4.
- A large tree at the upstream end of the landfill was removed. ERRS will attempt to remove debris from the root ball so that it can be reused in the creek restoration.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- The geotechnical engineering subcontractor was on site to discuss the results of their geotechnical sampling and testing and plans for post-excavation backfill and site grading.
- Off-site laboratory results were received for asbestos air samples collected from August 23-24, and all results were below site action levels.

**Saturday, August 27**

- ERRS loaded 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 loaded the waste into Containment Cell 5.
- START collected three composite samples from Containment Cell 4. The samples will be delivered to the off-site laboratory on Monday.
- START and USCG performed air monitoring with AreaRAEs, MultiRAEs, DataRAMs, and DustTraks and collected air samples for asbestos and lead. Air monitoring results were below action levels and within normal limits.
- START used the XRF to survey for metals at the potential borrow source east of the stockpile area. No significant or elevated metals concentrations were noted.

**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)**

<b>Day/Date</b>	<b>Debris/Soil</b>	<b>Concrete</b>	<b>Steel</b>	<b>Tires</b>	<b>Debris/Soil Distribution</b>
Mon, Aug 15	83				Cell 6 - 83 loads
Tue, Aug 16	41	3	1	4	Cell 6 - 20 loads, Cell 7 - 21 loads
Wed, Aug 17	80		1		Cell 7 - 80 loads
Thu, Aug 18	68		1	1	Cell 7 - 12 loads, Cell 8 - 56 loads
Fri, Aug 19	75		1	3	Cell 8 - 56 loads, Cell 1 - 19 loads
Sat, Aug 20					No Activity
Mon, Aug 22	69				Cell 1 - 69 loads
Tue, Aug 23	84		1		Cell 1 - 23 loads, Cell 2 - 61 loads
Wed, Aug 24	88		2		Cell 2 - 32 loads, Cell 3 - 56 loads
Thu, Aug 25	75		1		Cell 3 - 40 loads, Cell 4 - 35 loads
Fri, Aug 26	72		1		Cell 4 - 66 loads, Cell 5 - 5 loads
Sat, Aug 27	73			1	Cell 5 - 73 loads.
<b>Subtotal for Reporting Period</b>	<b>808</b>	<b>3</b>	<b>9</b>	<b>9</b>	

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

<b>Day/Date</b>	<b>Non-Hazardous Debris/Soil</b>	<b>Loads of Non-Hazardous Debris/Soil</b>	<b>Hazardous Debris/Soil</b>	<b>Loads of Hazardous Debris/Soil</b>	<b>Concrete</b>	<b>Steel</b>	<b>Tires</b>	<b>Notes</b>
Mon, Aug 15	1,628.54	51			245.04			
Tue, Aug 16	1,592.98	49			132.32	16.83	59.67	
Wed, Aug 17	1,779.69	55			56.49			
Thu, Aug 18	1,697.59	53				19.68		
Fri, Aug 19	1,633.84	50						
Sat, Aug 20	No Activity							
Mon, Aug 22	1,682.30	52						
Tue, Aug 23	1,875.09	57				19.72		
Wed, Aug 24	1,786.64	55					26.73	
Thu, Aug 25	1,541.29	48				20.87		
Fri, Aug 26	1,631.65	52						
Sat, Aug 27	1,578.16	47						
<b>Subtotal for Reporting Period</b>	<b>18,427.77</b>	<b>569</b>			<b>433.85</b>	<b>77.10</b>	<b>86.40</b>	
<b>Subtotal for All Previous Reporting Periods</b>	<b>88,171.40</b>	<b>2,742</b>	<b>1,770.62</b>	<b>61</b>	<b>3,940.36</b>	<b>417.43</b>	<b>138.39</b>	
<b>Total Material Hauled Off Site</b>	<b>106,599.17</b>	<b>3,311</b>	<b>1,770.62</b>	<b>61</b>	<b>4,374.21</b>	<b>494.53</b>	<b>224.79</b>	

**Total Off Site Disposal/Recycling all material to Date: 113,463.32 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.