United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Thursday, June 23, 2005
From: Andy Smith

To: Dan Opalski, EPA Region 10 (POLREP List) Chris Field, EPA Region 10 (POLREP List)

Subject: Clean-up Complete
Union Pacific RR Train Derailment at Kamela, Oregon
Meacham, OR
Latitude: 45.4250000
Longitude: -118.3750000

POLREP No.:	2	**Site #:**	E05007
Reporting Period:	3/8/05 - 6/21/05	**D.O. #:**	
Start Date:	3/6/2005	**Response Authority:**	OPA
Mob Date:	3/6/2005	**Response Type:**	
Demob Date:	3/7/2005	**NPL Status:**	
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:		**Reimbursable Account #**	
FPN#	E05007		

Current Activities
More exact figures for diesel spill are as follows:

* 320 gallons were release during original derailment onto the ballast and off to the west side of the tracks (Reefer car ARMN 110365).
* 375 gallons were unaccounted for from a diesel tank on a second reefer car(ARMN 110486). The tank appeared intact but by UPRR inventory fuel was missing from the tank.
* 200 gallons were released onto the bank of Dry Creek when moving a third reefer car (ARMN 110472).

Total diesel released is 895 gallons.

The soil where the 320 gallons was released was excavated during the second day of the derailment response. The bank of Dry Creek was also excavated.

April 8
A GPS/GIS specialist from CH2M HILL was on site to locate and record the positions of site features for inclusion in a base map. The base map was used in the restoration plan and also to show the areas of upland excavation and the locations of coffer/underflow dams.

April 11
RMCat installed weed-free straw mulch and straw bales along cut and fill slopes adjacent to Dry Creek. They noted that an extension of the southern access road adjacent to the east side of Dry Creek was muddy. This road was being used by UPRR Pacific to access a switch downstream from the derailment location. As the mud posed a potential siltation threat to Dry Creek, it was determined to pave the road with quarry spalls and a finer crushed rock.

April 12
Six test pits were excavated at locations indicated by the UPRR tier 1 catastrophic response contractor as areas potentially impacted by diesel fuel released during the derailment. The locations were based on the positions of derailed refrigerator cars, the staged locations of these cars and observed areas of stained soil. The Six test pits were excavated in a row above the seep just north of the south access road culverted crossing. The center four of these test pits encountered sheens and a few blobs of free oil at the water table. The two end test pits were clean. The four center test pits were vacuumed five times each, yielding 1,300 gallons of water with a very small immeasurable amount of oil. After vacuuming, the seep was noted to have slowed significantly. Oil did not reenter the test pits overnight and the test pits were

backfilled on Friday, the 15th.

RMCat removed the soil stockpiled on the west side of the mainline tracks to a landfill, and excavated one area of diesel-impacted soil nearby on the west side of the tracks. Excavations were backfilled with material similar to that excavated.

Routine site maintenance included daily inspection and repair as needed of the silt fencing, booms and sorbant pads, underflow dams, and straw mulch and bales.

April 21
CH2MHill submitted a preliminary draft restoration plan. NOAA Fisheries and Oregon Department of State Lands were involved with the review.

May 2
CH2MHill began construction of a permeable adsorptive barrier wall. A trench (120 x 3 x 9 feet) was excavated at the location of the six test pits to a depth of about 1.5 feet below the water table. A mixture of granular organophilic clay and sand was placed to 1.5 feet above the water table (between 7 and 9 feet below ground surface). 16,500 pounds of organophilic clay was used. A geotextile was placed over the fill and the trench backfilled with clean excavated soil to ground surface. The organophilic clay is designed to adsorb both non aqueous phase and dissolved diesel fuel. They finished on May 6. Pads and booms were removed before demobilizing.

May 17
The Final Restoration Plan was completed.

May 31
1. RMCat mobilized to the site to begin Phase 2 of the Restoration Plan.
2. Decision was made by restoration ecologist to postpone installation of willow stakes until spring 2006. On-site willows have broken dormancy and installation at this time will significantly decrease chance of survival.

June 1
1. Began regrading North Access Road to approximate pre-derailment grade. Side slopes are also being pulled back to reflect pre-derailment grades.
2. Underflow Dam #2 removed. Area was isolated by silt fence during work.
3. Mike Renz/ODEQ was notified that temporary culvert at North Access Road would be removed on afternoon of June 3.
4. Received authorization from ODEQ to remove Underflow Dam #1. No oil sheen observed.

June 2
1. Continued regrading of North Access Road and side slopes adjacent to the road.
2. Underflow Dam #1 removed. Site was isolated by silt fences and straw bales to reduce potential downstream impacts.
3. Straw bales (approx 150) were removed and will be placed in an upland location on UPRR property. Measures were taken to prevent sedimentation.

June 3
1. Continued grading of North Access Road
2. Seeding and installation of ECM along wreckage removal area
3. Installation of temporary erosion control measures along wetted perimeter adjacent to culvert inlet and outlet
4. Excavation and grading along culvert to expose pipe
5. Did not pull the culvert today. It was decided that pulling the culvert would create downstream turbidity and sedimentation impacts, and therefore, it will be pulled only after the stream channel and road fording the creek are recreated, and the entire area is regraded.

June 4
1. Removal of North Access Road culvert, grading, seeding, and ECM installation along stream side slopes.
2. Placement of jute mat in stream bottom along location of the culvert footprint
3. Placement of jute mat and 3+" rock at N. Access Road stream crossing
2. Placement of LWD in stream channel and adjacent floodplain at 2 locations along stream corridor
3. Seeding and installation of ECM along N. Access Road and borrow area side slopes.
4. Removal of straw bales and silt fences following completion of in-water work
5. Removal of all remaining straw bales, oil booms/sorbent pads, and silt fences

6. Demobilization from site

June 10
1. Identified photo locations for ecological monitoring and located using GPS
2. Walked the site to check on condition of seeding and ECM

Next Steps

EPA intended to keep the emergency response open through Phase 2 of the Restoration Plan which addressed bank stabilization. Phase 3 calls for planting native upland and riparian trees and shrubs in the fall. Watering and maintenance will continue for 2 years and ecological monitoring for vegetative success for 3 years. One aspect of Phase 2 called for planting willow stakes along the river bank. CH2MHILL was unable to meet the planting window, so the willow stakes instead will be planted during Phase 3.

Phase 3 will be overseen by Oregon's Department of Enivronmental Quality. The Department of State Lands provided conditions to the applicant and to DEQ for project implementation.

EPA will survey NOAA Fisheries, US Army Corps of Engineers, and Oregon's Department of State Lands to determine if they are satisfied with Phase 2 before closing this emergency response.

Oregon DEQ and EPA would like to convene a post incident review with the PRP and other key players. The purpose would be to review how the response went and how to improve for any future responses.

Key Issues

UPRR contracted with CH2MHILL to develop and implement a restoration plan. Confusion arose concerning meeting permit requirements under Section 404 of the Clean Water Act and consultation requirements under the Endangered Species Act. On April 5, NOAA Fisheries, US Fish and Wildlife Service (USFWS), and US Army Corps of Engineers (COE) staff from Le Grande along with consultants visited the site because the Potential Responsible Party (PRP) requested a 404 Permit. The PRP's representative, CH2MHILL, was accompanied by the Oregon DEQ OSC who was overseeing the response. No EPA representative was at that site visit. At that point, UPRR was looking at installing a permeable absorptive barrier wall between the tracks and Dry Creek, restoring the banks with grass and sedges in the river, pulling underflow dams, and removing culvert and fill. The Services felt there was no longer an emergency and consultation was in order before doing any work.

The PRP and the other Federal agencies were unaware that EPA was still the federal lead and of EPA's emergency response authority under the National Contingency Plan (NCP). By extension, the state OSC and the PRP were therefore working under the NCP. Under the NCP, the OSC determines when the emergency response is over. In addition, we were operating under Nationwide Permit #20, a programmatic 404 permit for oil spill cleanups granted for responses done under the NCP and under a state contingency plan. The state contingency plan is the three state (Washington, Oregon, and Idaho) Northwest Area Contingency Plan. In 2003, NOAA Fisheries had issued a programmatic Biological Opinion allowing for responses done in accordance with the NWACP. Dry Creek is proposed as a designated critical habitat for Steelhead salmon. In short, the PRP did not need to solicit a 404 permit. This confusion was later cleared up with all parties at a meeting May 3 in La Grande.