

United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Friday, November 4, 2005

From: Marc Callaghan

To: Bob Schwarz, ODEQ

Subject: Interim Report

Circle DE Lumber

3121 Crosby Street, Klamath Falls, OR

Latitude: 42.2064000

Longitude: -121.7497000

POLREP No.:	3	Site #:	10DE
Reporting Period:	Nov 3-8, 2005	D.O. #:	ERRS TO#:0042
Start Date:		Response Authority:	CERCLA
Mob Date:	10/31/2005	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ORN0001002344	Contract #	
RCRIS ID #:	OR0000036384		

Site Description

The Circle DE Lumber Site is a former wood treating facility. Past operations included wood treatment using PCP with diesel as a carrier oil.

The primary objective for this removal action is to reduce the off-site migration or the threat of the off site migration of listed hazardous waste.

Current Activities

Monday 10/31/2005: EPA (1), and START (2) personnel arrive on site. START used historic GPS location data from the 2003 Removal Assessment to mark sample locations on the ground. Excavation management units were identified and proposed based on 2003 sample references.

Tuesday 11/01/2005: EPA (1), START (2), and ERRS (2) personnel on site. Began excavation of contaminated soils. Approximately 70 tons of contaminated soil was removed and stockpiled for disposal sampling. Excavation is being conducted in 2 foot lifts.

Field screening, (11 samples collected) of floor and side walls from excavation area was completed. Data indicated elevated levels of PCP. This area will require further excavation down another 1.5feet (to 3.5 feet below the graded surface).

Wednesday 11/02/2005: EPA(1), START(2), and ERRS (3) personnel on site.

Operations Update: Continued excavation of contaminated soils. Excavation area is currently 36' by 36' by 3.5' deep. Excavated an additional 160 tons today (230 tons to date). 11 Field screening samples collected and analyzed from East wall and portions of North and South walls. Results indicate East and portions of the northern and southern walls (horizonatal contamination) are clean. West, SW and NW corners will need further analysis.

Thrusday 11/03/2005: EPA(1), START(2), and ERRS (3) personnel on site.

Operations Update: Continued excavation of contaminated soils. Prepared dip tank and concrete impoundment for off-site disposal.

22 PCP field screening samples were collected and analyzed. Samples were collected from the current floor area (excavation is currently 36' x 36' x 3.5' bgs), westernmost wall, and NW and SW corners. Sample results indicate further excavation outside the 36' x 36' x 3.5' is necessary on entire western area, NW and SW corner areas. Proposed excavation area will expand by approximately 6' feet to the West and around the NW and SW corners.

Friday 11/04/2005: EPA(1), START(2), and ERRS (3) personnel on site.

Operations Update: Dip tank and concrete impoundment sent off-site for disposal. These Haz Waste solids were sent to US Ecology Idaho Inc in Grandview, ID. Continued excavation of contaminated soils. ERRS backfilled the excavation area with clean fill in the area of where the screening sample results were clean.

Saturday 11/05/2005: START(2), and ERRS (3) personnel on site. START collected composite samples from 4 separate stockpiles. One composite sample was collected for every cubic yard of F032 waste encountered. Stockpile #1; contained approximately 140 cubic yards (yds3) (210 tons) of material. Results indicate PCP levels of approximately 66.5 parts per million (ppm). #2, 30 yds3 (45 tons); results indicated 822 ppm PCP; #3 and #4 consisted of 60 yds3 each (90 tons) results indicated elevated PCP at 281 and 165 ppm respectively.

Sunday 11/06/2005: START(2), and ERRS (3) personnel on site. ERRS excavated a 11' by 13' area of contaminated soil to a depth of 4' from north wall of the excavation area. START sampled each of the three walls at a depth of 2' and 4' below ground surface. START analyzed those samples with the PCP field screening kit and found no contamination over 2.2 ppm. The total volume of contaminated soils excavated from the site is approximately 311 cubic yards (466 Tons). ERRS combined stockpiles 2, 3, 4 into one large stockpile.

Monday 11/07/2005: START(2), and ERRS (3) personnel on site. START collected stockpile samples for disposal and shipped them offsite for laboratory analysis for dioxin, SVOA's, and NWTDPH Diesel.

Tuesday 11/08/2005: ERRS (3) personnel on site. ERRS completed backfilling the excavation pit and secured all excavated soil with visqueen and sandbags awaiting lab results for disposal.

Planned Removal Actions

The following Planned Removal Actions have been Completed:

- 1) Mobilize personnel and resources to the Site the week of 10/31/2005;
- 2) Arrange for proper utility locates;
- 3) Remove, dismantle, and scrap for off-site disposal/recycling tank and concrete impoundment to prevent future misuse and to access underlying contaminated soils;
- 4) Arrange for the proper off-site disposal of contaminated soils from the site;
- 5) Excavate and stock pile Pentachlorophenol (PCP) F032 contaminated soils into 2 separate dispositions: < 74 PPM pcg and > 74 PPM PCP;
- 6) Field screen and sample as necessary to support excavation, and disposal requirements;
- 7) Backfill excavated area with clean fill;
- 8) perform restoration activities as required;

The following Planned Removal Actions are Ongoing:

- 1) Install monitoring wells the week of Nov 14-18, 2005.

The following are Planned Removal Actions not yet Initiated:

- 1) Transport contaminated soils from the site;

Next Steps

Install monitoring wells the week of 11/14-18/05.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Haz Waste Solids NOS; Pentachlorophenol Class 9; F032	60 Tons	0001-0002	US Ecology Idaho Inc