

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Bremerton Auto Wrecking - Gorst Creek Site - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #1  
Non-Time Critical Removal Activities begin- Mobilization and Infrastructure  
Bremerton Auto Wrecking - Gorst Creek Site  
10GL  
Port Orchard, WA  
Latitude: 47.5099832 Longitude: -122.7405453

**To:**  
**From:** Jeffry Rodin, OSC  
**Date:** 1/28/2016  
**Reporting Period:** Spring 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 overtops 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.

- 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

Over the last Beginning in early March, project activities included multiple site walks with ERRS and/or START contractors to discuss issues including site layout and preparatory activities, site resource needs and logistics, subcontracting issues, and administrative site functions. Site walks occurred with both contractors on March 14<sup>th</sup> and 31<sup>st</sup> while EPA met with on site with ERRS contractors only on April 7<sup>th</sup>. During the March 31<sup>st</sup> site walk, adjoining property owners met with EPA and contractors to discuss site objectives and lease agreements to the proposed site activities.

Mobilization to the site for the initiation of preparatory construction activities occurred on April 11.

The site currently is divided into three work zones: the landfill area defined as the exclusion zone, bounded by the northeastern adjoining property, Airport Auto Wrecking, state highway 3 on the northwest, and adjoining private undeveloped properties on the south east side. Some of the adjoining prosperities on the southeast, and south west of the landfill boundary has been leased for use as the command post, stockpile area, and haul routes. Additionally access through other adjoining properties to the northeast of the landfill has also been acquired.

**April 11** - EPA and contractors mobilized initial site resources including temporary staging of the EPA Mobile Command Post (MCP). Primary site activities consisted of a safety call including EPA/START/ERRS contractors and a site walk including all contractors. Initial ERRS heavy machinery rentals were delivered to site.

**April 12** - ERRS begins construction of the primary haul road planned for moving staged landfill waste off-site. The haul road, approximately one mile in length, starts at the eastern extent of the Bremerton National Airport and continues northeast towards the staging area. Haul road construction included clearing and grubbing of the roadway and road rolling of on-site fill material used for the base of the roadway. Fill material primarily originated from the stockpile (laydown) area adjoining the landfill to the southwest.

A site walk with the landowner leasing access to the site in the area of the haul road occurred. Issues associated with haul road construction, areas acceptable for borrow and areas of concern to the landowner in the area of the landfill.

**April 13** – ERRS continues construction along haul road and begins clearing and grubbing on landfill cap. Electrical contractor on site for installation of utility poles. An additional pole was also installed on the berm near the southwest tip of the landfill, this pole is intended for placement of a time lapse camera for documentation of the landfill excavation activities.

**April 14** - Construction of the stockpile area is initiated. Activities included clearing and grubbing of the area and excavation and grading of stockpile cells used to segregate the primary waste streams from the landfill. The stockpile cells will also allow for sampling results to be received prior to off site transportation. START contractor video recorded conditions of the property at the Airport Auto Wrecking adjoining the site to the northeast due to the need to access the property for activities associated with upstream creek diversion. START also recorded the roadway leading to the job trailer portion of the site off Hwy 3 SW through the Alpine Evergreen business park and along the fenceline of residential properties located along the haul road to the site.

**April 15** – START Principal Engineer arrives on-site and performs site walk with EPA, ERRS, and START to discuss sediment control and stormwater protection activities. An approximate 800-gallon double-walled diesel tank is delivered to site. Installation of silt fence along sensitive areas of Haul road also occurred.

**April 16** - Excavation continues for stock pile area and cells.

**April 18** - ERRS Transportation & Disposal (T&D) Coordinator mobilizes to site to coordinate site walk and bid meeting with Disposal subcontractors. Representatives from five (5) disposal companies attended the meeting and surveyed the site conditions to prepare bids for the T&D Request For Proposal (RFP). ERRS activities include on-going site prep activities for stockpile area. The double-walled diesel tank was re-staged along haul road at entrance to stockpile area with upgraded secondary containment.

**April 19** - Haul Road activities continued by laying down large aggregate material for road base.

Kitsap Count Public Health personnel visited the site escorting a reporter for the digital edition of the Kitsap Sun. OSC Rodin granted a videotaped interview to the reporter for the piece. Additionally initial discussion with Kitsap Health District in regards to notifying residents downstream of the site, due to the potential for future creek flows to change as a result of the landfill which has restricted creek flow for multiple decades.

Job trailers arrived and were staged at the command post area southwest of the stockpile area. START demobilized the MCP.

**April 20** - ERRS installed sediment controls including stormwater catch ponds and vegetation along the northwestern boundary of the stockpile area anticipating potential discharges from this area.

START performed background soil sampling in the areas that could be impacted as a result of pending landfill excavation activities. A total of 8 composite samples were collected from the stockpile area, haul road easement, and the command post area. The samples were submitted for subcontract laboratory analyses for a range of analytes including VOCs/SVOCs/Metals/Herbicides/Pesticides/Dx/Gx/Asbestos.

**April 21** - Sand for containment cell construction begins arriving on-site and stockpiled as haul road is extended to the stockpile area. An access road was cleared along the northeastern site boundary adjoining Airport Auto Wrecking facility leading to upstream end of Gorst Creek; this roadway will be used to access and maintain a pumping system for future creek flow diversion stream diversion.

ERRS further developed the haul road leading from the landfill to the stockpile area. Additionally, access to the upstream portion of the creek was provided by excavating a two-step bench with sediment controls installed to provide access for future pumps, which will be used for creek flow diversion.

Washington State Labor and Industries (WA LNI) contacted OSC Rodin with concerns regarding asbestos wastes which may be removed from the site.

**April 22** - ERRS begins laying out sand used to construct the containment cells in the stockpile area. Surface debris was being segregated and stockpiled as clearing activities continued.

**April 23** – Construction activities from previous day continued. Due to difficulties in acquiring sand from an off-site source to construct the cells, a source of native soil was secured on site. ERRS continued to clear the landfill surface.

To date, approximately 1,200 tons of 2"-4" aggregate material has been delivered to site and laid down as road base for the haul road leading. Approximately 300 tons of < 5/8" aggregate material has been delivered for the service route along the northeastern boundary of the site to service pumps and provide access to the upstream portion of Gorst Creek; 660 tons of sand has been delivered for liner protection and protection of native soils from wastes staged in the stockpile area.

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

- Delivery of liners for containment cell construction within stockpile area
- Completion of access road for upstream portion of Gorst Creek
- Completion of haul road from to stockpile area
- Award of pump supplier and maintenance subcontract for creek flow diversion
- Award of analytical laboratory subcontract for stockpile waste characterization
- Initiation of landfill excavation and removal activities - Week of May 4

#### **2.2.1.1 Planned Response Activities**

#### **2.2.1.2 Next Steps**

#### **2.2.2 Issues**

## **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**

OSC Rodin has requested site contractors develop a unified safety plan harmonizing ERRS and START safety plans for consistency of response levels, emergency procedures, and other safety issues.

## **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 fishers Service and USFW,  
and NHPA consultations with the WA State Historic Preservation office, and Suquamish Tribe.

#### 4. Personnel On Site

For the Week of April 11-16

EPA            1  
START        1 , + 1 engineer  
ERRS         8-9

#### 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>

##### 6.2 Reporting Schedule

#### 7. Situational Reference Materials

No information available at this time.