

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 #5
Excavation and Off site Transport Continues
Bremerton Auto Wrecking - Gorst Creek Site
10GL
Port Orchard, WA
Latitude: 47.5099832 Longitude: -122.7405453

To:
From: Jeffry Rodin, OSC
Date: 6/7/2016
Reporting Period: 6/6/16 - 6/18/2016

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, June 6

- ERRS continued to excavate in the landfill and transferred 68 loads of landfill waste to Containment Cells 2 and 3. Also, 2 loads of concrete were transferred to the stockpile area.
- START collected samples from Containment Cell 2 for waste profile analysis, and the PST delivered them to the laboratory.
- No trucks/trailers were loaded today for off-site disposal to allow time for ERRS to develop a greater stockpile of excavated soil cleared for disposal as non-hazardous waste.
- ERRS received sand from off site and continued to build Containment Cell 8.
- A new excavator and operator were on site beginning today to increase the excavation production rate.
- START 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.
- Visitors from the Washington Department of Fish and Wildlife (WDFW) and the Suquamish Tribe were on site to meet with the OSC and tour the site.
- START performed an XRF survey of the northwest area of the landfill to assess a gray, powdery soil. Although one small area of reddish soil was identified with elevated lead concentrations, the lead results for the gray powdery soil were similar to background.

Tuesday, June 7

- ERRS loaded out the hazardous waste (lead) from Containment Cell 1 for off-site transportation. A total of 5 loaded trucks and trailers (155 tons) were sent to the Chemical Waste Management RCRA Subtitle C facility in Arlington, Oregon.
- ERRS continued to excavate in the landfill and transferred 69 loads of landfill waste to Containment Cells 3 and then Cell 1 (after the hazardous waste was removed). Also, 3 loads of concrete and 2 loads of tires were transferred to the stockpile area.
- START 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 collected samples from Containment Cell 3 for waste profile analysis, and the PST delivered them to the laboratory.
- START collected a background surface soil sample from the Containment Cell 8 area.

Wednesday, June 8

- ERRS completed construction of Containment Cell 8.
- ERRS continued to excavate in the landfill and transferred 54 loads of landfill waste to Containment Cells 1 and 8. Also, 9 loads of concrete and 6 loads of steel were transferred to the stockpile area.
- ERRS loaded waste from Containment Cell 4 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 42 loads and 1380 tons were sent off site today.
- START 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.
- ERRS noticed a large pile of roofing material that had been burned. START collected samples of this suspect material for asbestos testing. Sampling results indicated no detection of asbestos.
- A black bear was sighted on the landfill during the day while construction activities were ongoing.

Thursday, June 9

- ERRS continued to excavate in the landfill and transferred 94 loads of landfill waste to Containment Cell 8.
- ERRS loaded waste from Containment Cells 4, 5, and 6 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 55 loads and 1815 tons were sent off site today.
- START 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.
- The level of personal protective equipment (PPE) was downgraded from Level C to Modified Level D based on asbestos and lead air results, which were below action levels. All personnel on the landfill during excavation activities will continue to carry escape packs with them in the event that hazardous conditions are encountered.

Friday, June 10

- ERRS continued to excavate in the landfill and transferred 15 loads of landfill waste to Containment Cell 8 and 65 loads to Containment Cell 4.
- ERRS loaded waste from Containment Cells 4 and 8 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 55 loads and 1,756 tons were sent off site today. Also, 20 tons of steel was transported off site for recycling.

- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits. Sulfur dioxide (SO₂) sensors were installed and calibrated on AreaRAEs and MultiRAEs.
- START collected samples from Containment Cell 8 for waste profile analysis, and the PST delivered them to the laboratory.
- The alarm levels for electronic personal dosimeters (EPDs) were upgraded to 200 µrem/hour from 100 µrem/hour after discussion between OSC Parker and START Whitehead. The action level for radiation remained unchanged at 1,000 µrem/hour.

Saturday, June 11

- ERRS continued to excavate in the landfill and transferred 3 loads of landfill waste to Containment Cell 4 and 69 loads to Containment Cell 5.
- ERRS loaded waste from Containment Cells 2 and 7 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 54 loads and 1,737 tons were sent off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START performed weekly stormwater inspection. The 24-hour precipitation was 0.09 inches, and the weekly precipitation was 0.25 inches. No discharge was observed off site.
- START collected samples from Containment Cell 4 for waste profile analysis, and the PST delivered them to the laboratory.
- Approximately 10 car batteries were identified in the landfill debris. The batteries were segregated, placed in poly container, and staged in the cylinder staging area.

Monday, June 13

- ERRS continued to excavate in the landfill and transferred 3 loads of landfill waste to Containment Cell 5 and 79 loads to Containment Cell 6.
- ERRS loaded waste from Containment Cell 2 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 48 loads and 1,546 tons were sent off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START collected samples from Containment Cell 5 for waste profile analysis, and the PST delivered them to the laboratory.
- The batteries collected from the landfill were overpacked and secured, and the generators located at the air stations were grounded.
- OSC Parker met with START to discuss the processing of analytical data from the laboratory, and importing/publishing the data to Scribe.
- An electronic personal dosimeter (EPD) assigned to an excavator operator in the stockpile area recorded a brief (15 second) spike of radiation at approximately 1700 hours. After discussion with OSC Rodin, arrangements were made to obtain a Ludlum 2241 meter with pancake probe from the EPA Seattle ER warehouse. The Ludlum 2241 will be used to perform a radiation survey the following morning of the area near the excavator operator.

Tuesday, June 14

- ERRS continued to excavate in the landfill and transferred 12 loads of landfill waste to Containment Cell 2, 4 loads of landfill waste to Containment Cell 6, and 78 loads to Containment Cell 7.
- ERRS loaded waste from Containment Cell 3 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 46 loads and 1,534 tons were sent off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START collected soil samples from Containment Cell 6 for waste profile analysis, and the PST delivered them to the laboratory.
- START shipped asbestos air samples collected June 11 and June 13 to EMSL laboratory for analysis.
- START Health and Safety Officer Eric Lindeman performed a health and safety audit of all site operations including a review of the Integrated Health and Safety Plan and a site walk to observe operations.
- OSC Parker and OSC Becker met with START to discuss frequency and number of air samples for asbestos and lead for both fixed locations and personal sampling.
- EPA Region 10 EMP Manager Wally Moon arrived on site and met with OSC Rodin, OSC Parker, and OSC Becker.
- After the daily safety meeting, START performed a radiation survey of the area associated with the brief spike recorded by the EPD yesterday afternoon. The survey included the operator, the cab and exterior of the excavator, and the area adjacent to the excavator in the landfill. The survey did not identify a source of radiation, and no further investigation was required.
- ERRS began brush cutting on the Airport Auto Wrecking property adjacent to the fence along the north side of the landfill. The brush cutting is required in order to continue chasing buried landfill waste that extends onto the property.

Wednesday, June 15

- ERRS continued to excavate in the landfill and transferred 64 loads of landfill waste to Containment Cell 2 and 19 loads to Containment Cell 5. ERRS also transferred 4 loads of concrete to a staging area inside the stockpile and 3 loads of steel into roll-off bins.
- ERRS loaded waste from Containment Cells 1 and 3 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 49 loads and 1,601 tons were sent off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START collected soil samples from Containment Cell 2 and Containment Cell 3 for waste profile analysis, and the PST delivered them to the laboratory.

- ERRS continued brush cutting on the Airport Auto Wrecking property.
- OSC Boykin arrived on site with START data manager David Burford to perform an assessment of current Viper deployment and identify additional assets for procurement.
- OSC Rees arrived on site to discuss equipment tracking and regional response readiness with OSC Rodin.

Thursday, June 16

- ERRS continued to excavate in the landfill and transferred 17 loads of landfill waste to Containment Cell 1 and 59 loads to Containment Cell 3. ERRS also transferred 9 loads of tires to a staging area inside the stockpile.
- ERRS loaded waste from Containment Cells 1 and 8 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 50 loads and 1,652 tons were sent off site today.
- START 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 collected soil samples from Containment Cell 3 waste profile analysis, and the PST delivered them to the laboratory.
- START shipped asbestos air samples collected June 14 and June 15 to EMSL laboratory for analysis.
- ERRS continued brush cutting on the Airport Auto Wrecking property.

Friday, June 17

- ERRS continued to excavate in the landfill and transferred 53 loads of landfill waste to Containment Cell 1 and 45 loads to Containment Cell 8. ERRS also transferred 4 loads of tires into roll-off bins.
- ERRS loaded waste from Containment Cells 4 and 8 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 56 loads and 1,791 tons were sent off site today.
- A total of 15 tons of scrap steel was shipped off site today.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START collected samples from Containment Cell 1 for waste profile analysis, and the PST delivered them to the laboratory.
- START shipped lead air samples collected June 16 to EMSL laboratory for analysis.
- An EPD assigned to an excavator operator in the stockpile area recorded a brief (20 second) spike of radiation at approximately 1710 hours.
- ERRS completed brush cutting on the Airport Auto Wrecking property.

Saturday, June 18

- ERRS continued to excavate in the landfill and transferred 46 loads of landfill waste to Containment Cell 8 and 49 loads to Containment Cell 4.
- ERRS loaded waste from Containment Cells 4 and 5 into trucks and trailers for off-site disposal as non-hazardous waste. A total of 52 loads and 1,692 tons were sent off site today.
- After the daily safety meeting, START performed a radiation survey of the area associated with the brief spike recorded by the EPD yesterday afternoon. The survey included the operator, the cab and exterior of the excavator, and the area adjacent to the excavator in the landfill. The survey did not identify a source of radiation, and no further investigation was required.
- START performed air monitoring with AreaRAEs, MultiRAEs, and DataRAMs and collected air samples for asbestos. Air monitoring results were below action levels and within normal limits.
- START performed weekly stormwater inspection. Both the upstream and downstream sections of Gorst Creek are dry. The weekly precipitation was 0.66 inches. No discharge was observed off site.

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)

<i>Day/Date</i>	<i>Debris/Soil</i>	<i>Concrete</i>	<i>Steel</i>	<i>Tires</i>	<i>Debris/Soil Distribution</i>
Mon, June 6	68				Cell 2 (no count), Cell 3 (no count)
Tue, June 7	69	3		2	Cell 1 (no count), Cell 3 (no count)
Wed, June 8	54	9	6		Cell 1 (no count), Cell 8 (no count)
Thu, June 9	94				Cell 8 (94 loads)
Fri, June 10	80				Cell 4 (65 loads), Cell 8 (15 loads)
Sat, June 11	72				Cell 4 (3 loads), Cell 5 (69 loads)

Mon, June 13	82				Cell 5 (3 loads), Cell 6 (79 loads)
Tue, June 14	94				Cell 2 (12 loads), Cell 6 (4 loads), Cell 7 (78 loads)
Wed, June 15	83	4	3		Cell 2 (64 loads), Cell 3 (19 loads)
Thu, June 16	76			9	Cell 1 (17 loads), Cell 3 (59 loads)
Fri, June 17	98		4	4	Cell 1 (53 loads), Cell 8 (45 loads)
Sat, June 18	96				Cell 8 (47 loads), Cell 4 (49 loads)
Subtotal for Reporting Period	966 loads	16 loads	13 load	15 load	

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

<i>Day/Date</i>	<i>Debris/Soil</i>	<i>Loads of Debris/Soil</i>	<i>Concrete</i>	<i>Steel</i>	<i>Tires</i>	<i>Notes</i>
Mon, June 6	0 tons	0				
Tue, June 7	0 tons	0				
Wed, June 8	1,379.58	42				
Thu, June 9	1,814.66	55				
Fri, June 10	1,756.34	55		20.76		
Sat, June 11	1,737.12	54				
Mon, June 13	1,542.61	48				
Tue, June 14	1,533.87	46				
Wed, June 15	1,600.92	49				
Thu, June 16	1,652.41	50			28.74	
Fri, June 17	1,790.94	56		15.44		
Sat, June 18	1,692.36	52				
Subtotal for Reporting Period	16,500.81	507		36.20	28.74	

Subtotal for All Previous Reporting Periods	3,461.17	107		73.61	50.39	
Total Material Hauled Off Site	19,961.81	614		109.81	79.13	

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 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 June 6 - 11:

EPA 1-2

USCG 3-4

START 4-6

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>

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.