



## REGION 8

DENVER, CO 80202

### **ACTION MEMORANDUM**

SUBJECT: Approval and Funding for a Removal Action at the Grand Junction Solvents Site.

FROM: Craig Myers, OSC  
Emergency Response Section

THRU: Kerry Guy, Supervisor  
Emergency Response Section

Deirdre Rothery, Manager  
Emergency Management Branch

TO: Aaron Urdiales, Director  
Superfund and Emergency Management Division

#### **I. Purpose**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Grand Junction Solvents Site (Site) located in Grand Junction and Loma, Mesa County, Colorado. This emergency response involved the assessment, removal, and disposal of chemical containers on the Site. Conditions existing at the Site present a threat to public health or welfare or the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

#### **II. Site Information**

##### **A. Site Description**

Site Name: Grand Junction Solvents  
Site Spill ID (SSID): B8M9  
NRC Case Number: N/A  
CERCLIS Number: CON000826474  
Site Location: near 800 23 1/2 Road  
Lat/Long: 39.123700/ -108.617000  
Potentially Responsible Party (PRP):

NPL Status: Non-NPL  
Removal Start Date: 01/09/2025

**B. Site Background**

**1. Site Evaluation**

In December 2024, the EPA Criminal Investigation Division (CID) notified Region 8 Emergency Management Branch (EMB) of its investigation into numerous containers of abandoned hazardous materials at two properties in Mesa County, Colorado. CID reported that the containers contained hazardous substances abandoned by a hemp oil production company, including various hazardous chemicals such as acetone, heptane, and ethanol. The initial reports from CID estimated approximately 20-25 drums and 15-20 totes at a residential property at 820 23 ½ Road (adjacent to Appleton Elementary School) in Grand Junction, and 50-75 drums and 75-100 totes at a mixed-use property at 1431 12 Road, in Loma.

**2. Physical location and Site characteristics**

The Site consists of a residential property, a mixed-use property, and the necessary roads to navigate between the two.

The residential property exists in an expanding residential area of Grand Junction, with a school approximately 300 yards to the south, new residential development to the east, and farmland to the west. According to the 2022 census, Grand Junction has a population of 65,560 year-round residents, and experiences seasonal tourism fluctuations. The nearest waterbody is the Main Line Grand Valley Canal, located approximately 0.3 miles to the north of the Site.

The mixed-use property consists of pastureland, outdoor equipment storage areas, agricultural buildings, and multiple small housing units for staff. It is surrounded by family farm properties on all sides. The nearest town is Loma with an estimated population of 1,571 people based on the 2022 census. The nearest waterbody is the Kiefer Extension Grand Valley Canal which borders the property to the south.

Mean average yearly temperatures vary between 19°F and 93°F with average precipitation ranging between 0.45 inches and 1.21 inches monthly (National Weather Service Online Weather Data, accessed January 2025).

According to EPA's Environmental Justice (EJ) Screening and Mapping Tool, the data do not indicate potential areas of EJ concern at or near the Site.

**3. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant.**

There are numerous contaminants of concern at the Site including, but not limited to, acetone, heptane, and ethanol.

Abandoned chemicals at the Site exhibited the characteristics of ignitability, corrosivity, and reactivity, pursuant to the Resource Conservation and Recovery Act (RCRA) and therefore meet the definition of RCRA hazardous wastes. RCRA hazardous wastes are CERCLA hazardous substances as defined by Section 101(14) of CERCLA.

Acids and corrosives at the Site presented severe dermal hazards and inhalation hazards if reacted with incompatible materials, including water, which are present at the Site. The wastes which exhibited the characteristics of ignitability and reactivity pose a threat to fire and explosion as well as generating hazardous fumes which would threaten nearby populations.

The chemical containers were abandoned and many were damaged, open, and/or leaking. Because of low structural integrity of containers at the Site the hazardous substances at the Site have been released or posed a substantial threat of release into the environment.

Explosive chemicals were found at both properties (three 500ml amber bottles of borontrifluoride diethyl etherate and three 330-gallon totes of 32% hydrogen peroxide). These chemicals were unsecured. The amber bottles were laying in piles of debris, and the totes were intermixed with flammable and combustible totes near heavy machinery. The Removal Team worked collaboratively to dispose of these chemicals onsite with the help of local fire departments and bomb squad members.

An inventory of chemicals abandoned at the Site will be compiled as EPA's response action progresses.

### **III. Threats to Public Health Welfare or the Environment**

#### **A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.**

All drums and totes at the Site were stored in unsecured outdoor areas. The containers at the Grand Junction residential property were roadside and easily accessible to neighbors, passerby's and potentially children from the school down the street. The containers at the Loma mixed-use property were intermingled amongst the heavy machinery routes used to transport equipment around the property. At both properties, the containers were in varying states of disrepair and of low structural integrity. Staining on the grounds at the Site show

evidence of leaks in some drums and totes. Many containers are rusted, dented, cracked, without lids, and otherwise compromised.

The Site housed a large quantity of unknown and/or mislabeled containers. There were solvents stored in plastic containers exposed to high temperatures. Over time, the solvents in the plastic drums and totes have leached out plasticizers making the structure of the drums and totes weak and causing them to fail.

No other federal, local, or state agency has the technical knowledge, expertise, or resources to respond appropriately to the threats posed at the Site or to complete disposal activities.

**B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:** EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site.

- ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☒ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

#### **IV. Selected Removal Action and Estimated Costs**

##### **A. Situation and Removal Activities to Date**

###### **1. Current Situation.**

All containers present at the Site have been sampled, and hazard classification field testing has been performed, and each has been appropriately labeled.

To mitigate the threats the containers of hazardous materials pose at the residential property while awaiting final disposal, the Removal Team secured the

containers behind temporary fencing and used bulk consolidation and staging tactics to limit the number of compromised containers at the Site. In some cases, overpacking was used. Bulking efforts were limited by the low integrity of containers, in several cases drums fell apart while being consolidated into another container. Drums and containers with the lowest structural integrity were staged in a plastic lined containment zone in case further leaks occurred while awaiting final disposal.

Similar bulking and overpacking actions were taken at the mixed-use property, however no fencing was needed due to the remoteness of the Site. Where possible, containers have been moved so that containers with matching classifications are stored next to each other.

At both properties, containers are pending disposal at an appropriate facility.

## 2. Removal activities to date:

### a) Federal Government/Private Party

On January 6, 2025, EPA Removal Program mobilized to perform an assessment of the containers stored at the Site.

On January 9, 2025, EPA Removal Program initiated an Emergency Response under the Federal On-Scene Coordinator's warrant authority. While assessment activities including sampling of containers and classification of hazardous materials continued, the EPA also began removal activities. These activities included stabilizing, securing, and preparing abandoned chemicals/hazardous substance at the Site for disposal.

The Removal Team found that several containers posed enough of a threat that they required controlled detonation and in-situ burning with help from the local bomb squad and fire departments.

### b) State/local

Local authorities, including Grand Junction Fire Department, Grand Junction Bomb Squad, Grand Junction Hazmat teams, and Lower Valley Fire Department were available onsite during EPA assessment and removal activities for oversight and provided assistance with treatment and disposal of unstable chemical containers.

## 3. Enforcement

Where the responsible parties are known, an effort initially shall be made, to the extent practicable, to determine whether they can and will perform the necessary removal action promptly and properly.

## **B. Planned Removal Actions**

### **1. Planned action description**

Pending waste profiling, selection of a disposal facility, and final shipping arrangements, a team will mobilize to the Site to complete additional bulking and overpacking as needed and coordinate off-site disposal.

### **2. Contribution to remedial performance**

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the Site.

### **3. ARARs**

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

No ARARs were identified due to the urgency of the situation and the scope of the removal action to be conducted. RCRA requirements concerning waste analysis, manifesting, packaging, and transporting, while not ARARs, apply to off-site shipments of hazardous wastes.

### **4. Project Schedule**

Disposal profiling and off-site disposal arrangements are expected to be completed by the end of November 2025 but may be extended due to waste disposal issues/delays.

## **C. Estimated Costs\***

Contractor costs (ERRS/START staff, travel, equipment)	<b>\$610,000</b>
Other Extramural Costs (Strike Team, other Fed Agencies)	<b>\$0</b>
Contingency costs (20% of subtotal)	<b>\$122,000</b>
<b>Total Removal Project Ceiling</b>	<b>\$732,000</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

**V. Expected Change in the Situation Should Action Be Delayed or Not Taken**

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

**VI. Outstanding Policy Issues**

None.

**VII. Approvals**

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site met the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$732,000; this amount will be funded from the Regional removal allowance.

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Aaron Urdiales, Director  
Superfund and Emergency Management Division

\_\_\_\_\_  
Date

Attachments

Attachment 1: Maps



Grand Junction Solvents - GJ Site



1/29/2025, 1:23:19 PM

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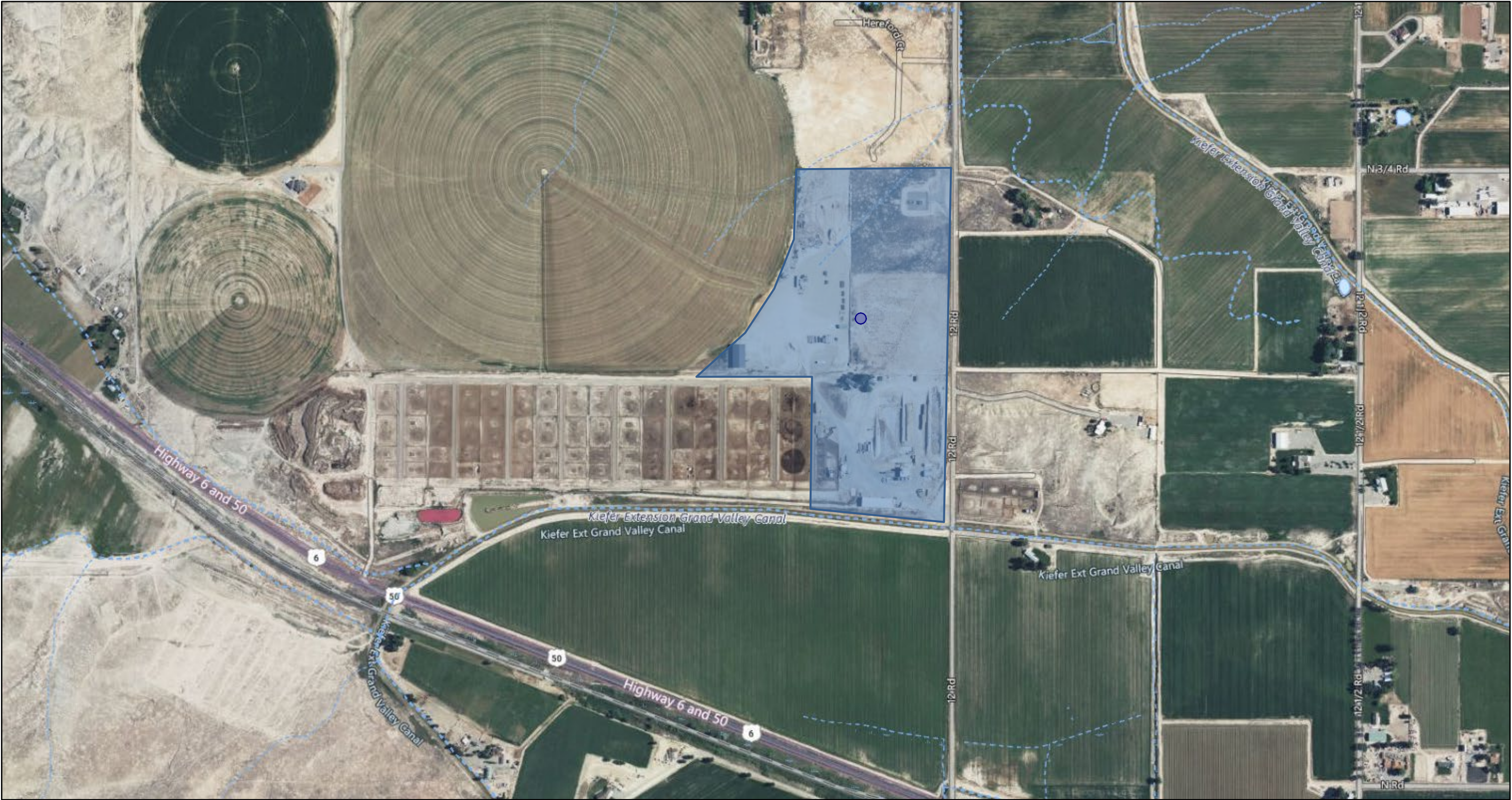
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The National Map: National Hydrography Dataset. Data  
refreshed October, 2023.



Grand Junction Solvents - Loma Site



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