U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Samoa Pulp Mill - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #2**
Samoa Pulp Mill

Samoa, CA
Latitude: 40.8049600 Longitude: -124.1933100

To: Harry Allen, EPA Region 9
Peter Guria, EPA Region 9
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From: Steve Calanog, OSC
Date: 10/7/2013
Reporting Period: 10/03-06/2013

1. Introduction

1.1 Background

Site Number:	TBD	**Contract Number:**	EP-S9-12-01
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	9/30/2013	**Start Date:**	10/1/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

The Samoa Pulp Mill Site is a 70 acre former industrial pulp manufacturing facility. The pulp mill was constructed in 1963 by Georgia Pacific. In the early 1970's Louisiana Pacific acquired and ran the facility until 1990. From 1990 until 2008 various smaller ownership groups owned and operated the facility. The last operating owner of the facility was the Evergreen Pulp Company which ran the facility until 2008. Evergreen experienced financial difficulties and "walked away" from the mill site without properly closing operations. Sometime in 2009 a venture group called Freshwater Tissue Company purchased the facility site with intent of converting to a tissue mill. This quickly failed to reach fruition and Freshwater began scraping the facility and consolidating hazardous waste. In August of 2013 Freshwater Tissue Company sold the facility to the Humboldt Bay Harbor District (aka - Port Authority). The facility is currently staffed with 2 part-time Humboldt Bay Harbor District employees.

1.1.2.1 Location

The Samoa Pulp Mill Site is located within Humboldt County in Samoa, CA. The Site is approximately 70 acres of industrial pulp processing operations and is situated on the North Spit of Humboldt Bay. The facility is on the shore line of Humboldt Bay and has an industrial wharf on the Bay. The Pacific Ocean is located within 800 yds to the west of the facility.

1.1.2.2 Description of Threat

The facility has approximately 30 tanks which contain 4 million gallons of highly caustic liquids (pH greater than 13), 10k gallons of acids (pH less than 1), 3,000 tons of corrosive sludges in uncontained areas, approximately 3k gallons of turpentine, several laboratories with approximately 1000 containers of a wide range of chemicals in various states of stability, and several thousand containers of various types (i.e., compressed gas cylinders, paints/thinners, mercury containing gauges and equipment).

EPA assessment has determined that almost all tanks are leaking or failing. Several of the tanks pose an immediate risk to overflowing due to rainwater accumulation. Several of the tanks which currently hold pulping liquors are not designed to store caustic liquids. Laboratory chemicals are stored improperly and/or are reacting. Rain is exacerbating runoff on-going discharge risks to Humboldt Bay.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In August, 2013, the Humboldt Bay Harbor District requested OSC Calanog to conduct a preliminary assessment of the hazardous materials which remained at the facility. What remains at the facility are approximately 30 large aboveground storage tanks which contain approximately 4 million gallons of pulping liquors, a caustic liquid with a pH of 13 or greater, approximately 10,000 gallons of acids (primarily sulphuric), and over 3,000 tons of corrosive sludges. Many of the tanks are leaking material and are in various states of decay. Further many of the tank roofs leak rain water and are at their capacity. Subsequent assessment during the week of September 23rd, 2013, EPA determined that 2 of the large aboveground storage tanks were at capacity and threatened to overflow and/or fail completely. OSC Calanog exercised his emergency response warrant to initiate an action to stabilize the site with the primary objective of removing product from 2 tanks which were threatened to overflow.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During the week of September 23rd, 2013, EPA, START and ERRS conducted a thorough removal assessment of the Samoa Pulp Mill Site. The primary objective of the assessment was to determine the condition of tanks holding the 4 million gallons the caustic pulping liquors. During this assessment it was determined that two of the 30 tanks had roofs that were failing and that excessive rainwater was accumulating in the tanks and were threatening to overflow. Due to the condition of these tanks, the overall condition of the facility, and the proximity of Humboldt Bay OSC Calanog exercised his warrant authority to initiate an emergency response to stabilize the facility.

2.1.2 Response Actions to Date

09/30/13 - EPA, START, ERRS, and the USCG PST mobilized to the Samoa Pulp Mill Site. OSC Calanog requested the USCG PST to mobilize personnel and chemical pumping equipment to support removing caustic liquids from tanks.

10/01/13 - EPA, START, ERRS, and USCG PST met with Humboldt Bay Harbor District personnel to discuss and plan a strategy for removing the caustic liquids from the two tanks of concerns. During this time Baker tanks started to arrive at the facility site. EPA, START, and ERRS conduct further assessment of the facility grounds and began assessing the laboratories located on-site.

10/02/13 - Additional equipment continued arriving on-site which included additional Baker tanks (10 total), the USCG chemical pumping equipment, USCG HMRT, and USCG personnel. Additional piping and hosing arrived to construct a 400 yard chemical pumping pipeline. EPA, START and ERRS determined that several containers in the large laboratory were in a condition which present and immediate threat of explosion. ERRS carefully isolated these containers in the lab. The large lab is currently sealed and EPA has restricted access to the lab for the time being.

10/03/13 - ERRS crew continued to receive frack tanks and pipeline materials. Frack tanks are "plumbed" together in two groups of 5 tanks each. USCG began unloading trucks and staging their equipment.

10/04/13 - ERRS crew finished pipeline and connecting the groups of frack tanks. Humboldt County Department of Health representatives met with the EPA OSC and toured the facility.

10/05/13 - ERRS and USCG personnel established two personnel decon stations and did a decon walk-thru for all personnel. A hydro-test was conducted on the constructed pipeline and all frack tanks.

10/06 - All personnel were on-scene at 0600 and prepared to pump from the white liquor tank. Over the course of the day approximately 125k gallons of white liquor was removed from the storage tank to the frack tanks.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has been in discussions with Humboldt Bay Harbor District with regards to their responsibility as the current owner. Verbal notice has been provided by the OSC to the Humboldt Bay Harbor District. EPA civil investigators have been engaged in an investigation and assessment with regards to the responsibility of previous owners (e.g., Evergreen Pulp Company).

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Caustic liquids	liquids	4m gallons			
Acids	liquids	10k gallons			
Corrosive sludges	semi-solids	3k gallons			
Turpentine	liquids	3k gallons			

Lab Chemicals	various	~2k containers			
"HHW" type	various	~2k containers			
Hg	liquids	Unk at this time			
Waste oils	liquids	~2k gallons			

2.2 Planning Section

2.2.1 Anticipated Activities

The facility presents a myriad of immediate environmental hazards. The EPA OSC strategy is to stabilize, mitigate, and remove as many of these hazards as is possible.

2.2.1.1 Planned Response Activities

The crew will continue to remove caustic liquid from tanks of immediate concern and utilize frack tanks for temporary storage. ERRS and START will lab-pack high hazard chemical found in the laboratories.

2.2.1.2 Next Steps

2.2.2 Issues

Due to the government shutdown Regional EPA support, reporting, and coordination is significantly curtailed.

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

No information available at this time.

3. Participating Entities

3.1 Unified Command

Humboldt Bay Harbor District

3.2 Cooperating Agencies

4. Personnel On Site

EPA OSC - 1
START - 2
ERRS - 6
USCG - 10

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.