U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Queen Avenue Property Absorbent Technology - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #2**
Removal Progress
Queen Avenue Property Absorbent Technology
Albany, OR
Latitude: 44.6223700 Longitude: -123.1023000

To:
From: Daniel Heister, On-Scene Coordinator
Date: 10/24/2013
Reporting Period: October 19 through October 22, 2013

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
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:	10/15/2013	**Start Date:**	10/15/2013
Demob Date:	10/22/2013	**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Production Facility

1.1.2 Site Description

Albany Fire Department became aware in early October 2013 of a potential public safety and health hazard involving Absorbent Technologies, Inc., at 140 Queen Avenue SW and 2830 Ferry Street SW. Absorbent Technologies had been in business on these leased properties since 2004, creating a soil additive and fertilizer that was used to improve crop irrigation efficiency. The company ceased all operations at 5:00 p.m. Friday, October 11, 2013.

The process for producing Absorbent's product involved the use of various hazardous materials that were abandoned at the site when the company closed its doors. Of primary concern is a tank at the Queen Avenue site containing acrylonitrile, a flammable and corrosive chemical with the potential to impact human health. When the plant was abandoned, Albany Fire Department immediately took steps to ensure the safety of the community by stabilizing the acrylonitrile tank, hiring security staff for the site, and working on a plan to appropriately deal with the other hazards that were left behind on both properties.

City staff contacted the EPA on Tuesday, October 15. EPA staff immediately mobilized to the site and as of Thursday, October 17, two federal on-scene coordinators were in Albany with a team of 12 contractors, chemists, engineers and other specialists. Tank removal of the product is planned for Monday, October 21, with decommissioning of the tank the following day.

EPA is working closely with Albany Fire Department, Public Works Environmental Services, the City Attorney's Office, and Linn County Public Health. Facility operators and both property owners are cooperating.

1.1.2.1 Location

The Queen Plant is located south of Queen Avenue SE between SW Ferry Street (to the west) and SE Lyon Street (to the east) in Albany, Oregon.

The City of Albany is located approximately 20 miles south of Salem, Oregon and approximately 70 miles south of Portland, Oregon, along the Interstate 5 corridor in the Willamette River Valley region.

The Queen Plant is located in a mixed use area with a 400-person industrial facility to the west, and residences to the east. Parking areas are located to the north, and an undeveloped lot is located to the

south. Further, additional residential and light industrial populations are present.

An additional facility used for ATI's research and development is located nearby at 2830 SW Ferry Street, Albany, Oregon (Ferry R&D). Light commercial lots exist to the north, south, and west and residential area exist to the east.

1.1.2.2 Description of Threat

Hazardous Materials and wastes are located at the Queen Plant. The chemical of greatest concern is approximately 2,700 to 2,800 gallons of acrylonitrile (AN), present inside a 20,000 gallon STI Fireguard ®, UL 2085 (protected, insulated, and fire resistant) tank designated TK-0110. TK-0110 is located within secondary containment. TK-0110 is equipped with fire detectors, fire alarm, foam fire suppression system, and acrylonitrile vapor detectors, but testing and calibration of these systems has expired. TK-0110 is also equipped with a nitrogen “blanket” system designed to prevent AN from contacting oxygen in ambient air. AN is considered highly hazardous due to flammability and toxicity characteristics and can degrade into cyanide gas in a fire situation above 800 degrees F.

Also of concern is the fact that a "stabilizing agent" added to the AN to inhibit both its corrosive effects and to prevent polymerization (which could lead to ignition) is only effective for six months. The AN in this tank has been there over eighteen months. Neither the chemical expert for the manufacturer, nor the chemist who managed the facility could assure responders that any stabilizer remained in the AN. Both experts agreed that adding more stabilizer to the tank would be futile because it needed to be blended and the tank had no agitator.

Other identified chemicals of concern at the Queen Plant are potassium hydroxide, sodium hydroxide, cerium ammonium nitrate, sulfuric acid, phosphoric acid and smaller quantities of various lab and industrial chemicals and compressed gases.

Undetermined liquid wastes in plastic totes are also present at the Queen Plant.

There is no evidence that any of the chemicals or wastes at the Queen Plant have discharged into the environment at this time. Most of these chemicals are within warehouses at both sites and are properly contained.

Seventeen liquid waste totes (approximately 275 gallons each), 2 methanol tanks, and various lab chemicals are located at the Ferry R&D facility.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

TK-0110 has been examined by EPA, START, ERRS, and by the City of Albany Fire Marshal.
ERRS created a plan for the removal of AN from TK-0110 to a cleaned chemical tanker trailer for transport to a TSDF facility in Aragonite, Utah. EPA and the Fire Marshal approved the ERRS transfer plan on 10/20/2013, and the transfer was completed on 10/21/2013. The tanker truck left the site on 10/22/2013 and the material was bound for destruction in Texas rather than Utah.

A plan submitted by ATI’s former process chemist to neutralize the AN by processing it into unfinished inert product was not adopted by EPA due to the relatively long processing time (several weeks) and uncertain conclusion.

The waste totes are currently under evaluation. Preliminary field tests on a subset of the totes were performed and definitive samples were collected and were submitted to a commercial contract lab for expedited definitive analysis.

Other chemicals of concern will not be removed by EPA at this time. The estimated risk and consequence of release from these chemicals is low enough that EPA has agreed to allow the property owners to hire their own contractors to responsibly remove these chemicals with EPA oversight. EPA met with the Queen St. property owner on Tuesday 10/22/2013 to discuss a draft plan. The property owners will submit their final plan to EPA for approval on or about 10/25/2013.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.1.1 Current Situation as of close of business 22-October-2013:
The site is under control with 24 hour staffed security, perimeter fencing and secured gate. Buildings are locked. AN has been transferred from TK-0110 to a chemical tanker truck without incident, and the truck departed with the AN for disposal in Texas. The truck transporting the AN arrived at the Deer Park, TX disposal facility on 10/28. The property owners are determining next steps to handle remaining hazards on the property at the Queen Plant. An after action meeting or "hot wash" between Albany Fire, Hazmat Team 5, and EPA on 11/8 to discuss how the operation went and how things could improve.

2.1.2 Response Actions to Date

a. The Sites (Queen Plant and Ferry R&D) were abandoned by the operator due to bankruptcy.

- During the bankruptcy process, when the operator was no longer able to maintain the nitrogen blanketing system, the City of Albany Fire Marshal stepped in to ensure that utilities were maintained and that the nitrogen tank providing the blanket was serviced.
- EPA, START, and ERRS mobilized to the site after bankruptcy was concluded in order to assess hazards and assess the creditor’s ability to assume responsibility for the hazards.
- START inventoried hazardous materials and wastes in the Queen Plant facility.
- EPA, START, and ERRS met with the current owners (creditors) and the former process chemist to

assess their proposed AN neutralization plan.
- EPA, START, and ERRS met with two former maintenance employees who provided technical information on TK-0110, the vapor scrubber system, and support systems.
- EPA met with City of Albany Public Health and provided a site tour.
- START and ERRS provided a site walk for City of Albany firefighters so that they can plan Fire Suppression and Rescue support services during the transfer.
- ERRS has started preparing a AN transfer plan.
- An IAP was prepared prepared for the scheduled operational periods from 18-October-2013 through 22-October-2013.
- START field tested samples from several representative liquid waste totes using a variety of techniques. Subsequently, START collected samples for definitive laboratory analysis.
- EPA, START, and ERRS performed a limited assessment at the Ferry R&D facility. Additional sampling of totes and the graft reactor was completed by START on 18-October-2013.
- ERRS subcontracted with a private company to inspect the fire supression system in and around the tank to ensure it was operational. The system was determined to be operational when triggered manually - the automatic triggers could not be inspected in time.
- ERRS acquired the AN stabilizer product which was placed in the tanker truck before pumping of the AN on 21-October-2013. Chemical experts said that the filling of the tank would provide sufficient agitation to blend the product into the AN.
- ERRS transferred all AN from TK-0110 to a pre-cleaned stainless steel chemical tanker truck. Albany Fire, Oregon Fire Marshal, and EPA monitored the operation. No indications of leaks were detected during the transfer.
- The AN is currently in transit to Texas for disposal.

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

- The former operator is a PRP, but is under bankruptcy.
- The creditors (current property owners) are PRPs.
- The supplier of the AN, INEOS, indicated they were not interested in having any unused AN returned to them.
- No other PRPs have been identified at this time.

2.1.4 Progress Metrics

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Acrylonitrile w/ MEHQ and H2O	Off-Spec Product	apx 3000 gallons			
Liquid Wastes	Aqueous	apx 10,000 gal.			
Other COPCs	Liquid and Solid	TBD			

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities
Disposal of AN by ERRS subcontractor in Texas.

Removal/Disposal of remaining COPCs by current property owners.

2.2.1.2 Next Steps
Current property owners must submit plans for proper disposal/disposition of COPCs to OSC this week.

2.2.2 Issues

2.3 Logistics Section

ERRS has assumed control of utilities at the site and will manage their logistics for the removal operation. Utilities will be turned over to current owner at TBD date.

START is demobilized.

2.4 Finance Section

2.4.1 Narrative
EPA contractors are managing finances separately and tracking costs between the two sites and reporting to EPA.

2.5 Other Command Staff

2.5.1 Safety Officer

START – Jim Petersen

EQM – Pat Heyneman (H2O)

EPA – Dan Heister

2.5.2 Liaison Officer
OSC (IC) Daniel Heister

2.5.3 Information Officer
Hanaday Kader

3. Participating Entities

3.1 Unified Command
The incident commander (IC) is OSC Daniel Heister and Ryan Bond Oregon Haz Mat Team 5.

3.2 Cooperating Agencies
City of Albany Fire Marshal and Fire Department, HazMat Team 5, and Oregon State Office of the Fire Marshal are cooperating with EPA**.**

4. Personnel On Site

EPA
Daniel Heister (OSC, UC)
Mike Sibley (OSC)

START
Jim Petersen (PM)
Brad Martin (PD)
Ryan Whitchurch
Eric Nuchims
Mike Worden
Chris Whitehead

ERRS
Jerry Wade (PM)
Pat Heyneman (PM, H2O)
Doug McManamy (Equipment Operator)
Randy Rhoads
Two subcontractors from Global Diving and Salvage

HAZMAT TEAM 5
Ryan Bond (UC)

CITY OF ALBANY FIRE MARSHAL

CITY OF ALBANY FIRE DEPARTMENT

OREGON STATE FIRE MARSHAL

5. Definition of Terms

PM = Project Manager
OSC = On Scene Coordinator
UC = Unified Command Commander

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule
POLREPS completed as milestones are achieved on TBD basis.

7. Situational Reference Materials

No information available at this time.