

United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Thursday, January 20, 2005

From: Michael Boykin

Subject: Initiation of Action

Colville Post and Pole, Inc. Time Critical Removal Action

Hwy 395 North, Colville, WA

Latitude: 48.5787667

Longitude: -117.9562833

POLREP No.:	1	Site #:	10CL
Reporting Period:	01/10/05 to 01/19/05	D.O. #:	0031
Start Date:	1/10/2005	Response Authority:	CERCLA
Mob Date:	1/10/2005	Response Type:	Time-Critical
Demob Date:	1/19/2005	NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	WAN001002608	Contract #	
RCRIS ID #:			

Site Description

Colville Post and Pole, Inc. (CPPI), located approximately four miles outside of Colville, Washington, is a wood-treating facility that uses pentachlorophenol/diesel (PCP) treating solutions to manufacture predominantly PCP-treated fence posts and rails. Wood-treating operations have occurred on the 23-acre site for approximately 54 years under several different owners and companies. Wood-treating operations at this location consist of heated solution dip tanks and an adjacent drip pad with treated wood product being stored over soil in various locations in the yard. The Site is located within 200 feet of the Colville River and its associated riparian ecosystem and habitats for threatened species. The river is a tributary to Lake Roosevelt (the Upper Columbia River), currently under investigation with the EPA Region 10 Remedial Program for impacts from contaminated sites within the drainage area.

As described in the Site Profile, the Washington State Department of Ecology (Ecology), EPA Region 10 RCRA and CERCLA have conducted inspections and provided CPPI owners with Resource Conservation and Recovery Act (RCRA) guidance during facility upgrades and several incidents of releases of PCP/diesel from piping, drip pads, and ruptured ASTs. Because of a history of releases at the Site and known SPCC compliance issues, EPA RCRA coordinated with EPA CERCLA in October 2002, and conducted a Removal Site Evaluation (RSE) of CPPI and found PCP, dioxin, and diesel contamination in surface and subsurface soils, in groundwater, and in surface water. A SPCC inspection of the PCP/diesel tanks and a review of the facility's SPCC Plan found CPPI to be out of compliance with the SPCC regulations.

CPPI has determined that they are unable to secure the resources to upgrade the facility and conduct the necessary cleanup to meet regulatory requirements and decided to cease operations at the facility for an indefinite period of time. Because of the presence of contamination and the potential for further human health exposure and harm to the environment, EPA Region 10 has commenced with a Time-Critical Removal Action to be conducted in two phases. Phase I of the removal consist of actions needed to secure the facility, restrict access, and stabilize the hazardous waste onsite for transportation and disposal off-site as the owner ceases operations in January 2005. In Phase II of the removal, EPA will undertake actions necessary to address pentachlorophenol (PCP), dioxin, and diesel contamination in soil and groundwater.

Current Activities

January 10, 2005

One EPA OSC, 5 ERRS personnel and 2 START members mobilize to the site to set up command post and prepare for Phase I removal activities.

January 11 - 19, 2005

One EPA OSC, 5 ERRS personnel and 2 START members initiated and completed the following activities:

1. ERRS installed temporary fencing to restrict access around treatment building, ASTs, and known contaminated areas in Process Area.
2. ERRS disconnected piping and pumps and removed remaining liquid PCP/diesel treating solution from thermal tank, storage tanks, piping, pumps, and sumps and placed in drums.
3. ERRS removed sludge from thermal and storage tanks and associated equipment and solidified free liquid before placing in drums.
4. ERRS subcontracted a vacuum truck and removed liquids (95% wastewater/5% PCP-Diesel Oil) from main secondary containment sump and two drip pad leachate collection sumps.
5. Under OSC direction, ERRS utilized a trackhoe and front-end loader to move snow, breach frozen ground, and install test-pits in the Process Area and South Stockpile Area for START to collect soil samples.
6. To secure the site for winter, ERRS cleaned free product/sludge from treatment building floors and drip pad, collected drippage from disconnected piping and tanks, placed all suspected contaminated equipment and debris into treatment building or thermal tank, and moved fencing to allow for owner access to maintenance shop.
7. ERRS loaded drums of waste and shipped off site. A summary of waste removed can be found in the Disposition of Wastes section at the end of this Polrep.
8. START collected 15 sediment samples from on-site drainages and wetlands and the Colville River for Site Assessment HRS Scoring purposes.
9. START collected 41 surface soil samples (8 for Site Assessment HRS scoring) from known contaminated locations in the Process Area and suspected clean/low contamination locations in South Stockpile Area. All 41 samples to be analyzed by the START utilizing a field immunoassay analytical test kit to determine if technology would be a cost effective means to determine extent of contamination during soil excavation.
10. START collected four surface water samples from Colville River and on-site drainages.
11. START collected 46 hexane wipe samples of on-site equipment, buildings, and vehicles to assess potential extent of PCP contamination of items that owner may sell or have already sold to the public.
12. START submitted a total of 106 samples (surface water, surface soil, sediments, wipes) to the analytical laboratory for PCP, Chlorinated Phenols, or Semi-Volatile Organic Compounds analyses.
13. START conducted photograph and logbook documentation of site cleanup and sampling activities.

Planned Removal Actions

Phase I removal activities to secure the site, restrict access to heavily contaminated areas, and stabilize/remove hazardous liquids and sludge were completed as of January 19, 2005.

Ongoing preparation and planning work for the Phase II removal action will occur during January, February, and March 05 for potential Phase II activities to occur in Spring/Summer 05.

Next Steps

Activities presently underway in preparation and planning for the Phase II Removal Action include but are not limited to: consulting with Ecology on ARARs to guide cleanup and determination of site future; consulting with USFWS on the need for a Biological Assessment; working with EPA ERT, START, ERRS to evaluate and determine removal remedy; consulting with Colville Confederated Tribes and other Stakeholders on removal remedies; evaluating efficacy of field technology and data validation/correlation.

Key Issues

Key Issues for Phase I removal activities included:

1. Sub-zero temperatures and two feet of snow cover that slowed activities and disabled heavy equipment during critical times.
2. Owner of facility was not readily accessible to discuss access issues and resolve technical difficulties.
3. Owner had ceased operations but was continuing to sell and move equipment and materials on site which raised potential safety and access concerns.

Potential Key issues in planning and implementing Phase II activities:

1. Determining cost-effective, technically-feasible and protective removal remedy for this site in the floodplain of the Colville River.
2. Long-term monitoring and use of site once Phase II activities completed.
3. Identification of other sources of contamination, in addition to Process Area, which may be contributing to groundwater contamination.
4. Develop understanding of hydrogeology conceptual site model.

Disposition of Wastes

Hazardous Wastes transported off site under Manifest Document No. 11301 by General Environmental Management on 18 Jan 05 to Ross Incineration Services in Ohio.

13 Drums of Waste PCP Treating Solution = 715 gallons

25 Drums of Waste PCP Sludge = 1,375 gallons

1 Drum of PCP-contaminated IDW soil = 800 pounds

1 Drum of PCP-IDW decon/purge water = 55 gallons

1 Vac-Truck of PCP-contaminated Wastewater = 1,200 gallons

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