U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Inchelium Wood Treatment Plant - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject:	**POLREP #2** **PROGRESS** **Inchelium Wood Treatment Plant** **10MZ** **Inchelium, WA** **Latitude: 48.2944454 Longitude: -118.2065997**
To:	EPA HQ, EPA HQ (POLREP List)
From:	Jeffrey Fowlow, On-Scene Coordinator
Date:	9/20/2014
Reporting Period:	9/15/2014-9/20/2014

1. Introduction

1.1 Background

Site Number:	10MZ	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/14/2014
Response Authority:	CERCLA	**Response Type:**	
Response Lead:	EPA	**Incident Category:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	9/8/2014	**Start Date:**	9/8/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	WAD980977847	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Inactive Production Facility

1.1.2 Site Description
1.1.2.1 Location
The Site is located at 18 Blackbird Drive, Inchelium, Ferry County, Washington, 99138 on the Colville Reservation. The Site is mostly located in Section 12 (with a small portion in the Section 1) of Township 32 North, Range 36 East, Willamette Meridian (latitude 48° 17' 40" north, longitude 118° 12' 23" west).

The area surrounding the Site is a mixture of rural and residential, with several residences located to the north, south, and northwest of the Site.

For additional details, please refer to POLREP 1.

1.1.2.2 Description of Threat
Substantial environmental information exists about the Site. Environmental investigations completed at the Site in the 2000s show that soil and groundwater are contaminated with arsenic, chromium, and copper and that the source of these metals is wood treatment operations using chromated copper arsenate (CCA). CCA-contaminated sludge and wastewater are present in containers at the Site, including above-ground storage tanks (ASTs) and sumps. Spent formulations, residuals, drippage, and other wastewaters from wood preserving processes that use arsenic or chromium (i.e., CCA) are RCRA listed hazardous wastes (waste code F035).

In addition to arsenic, chromium, and copper, lead is also a contaminant of concern (COC) at the Site. Although the source of the lead contamination has not been determined, lead has been detected in Site soil at concentrations as high as over 100 times the natural background levels for Washington State and over 10 times the Site cleanup level. The lead contaminated soil known to be at the Site is mostly collocated with contamination from wood treating chemicals.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
2008 - URS Site Investigation
URS conducted a Site investigation at IWTP in July-August 2008. The field investigation concluded that soil and concrete at IWTP is contaminated with metals, including chromium, copper, arsenic, and lead, at concentrations exceeding established Site-specific cleanup levels, which were based on Washington Department of Ecology Model Toxics Control Act (MTCA) cleanup levels. The URS report estimated that

approximately 6,000 cubic yards/tons of soil are contaminated with metals.

2014 – EPA Removal Assessment
In May 2014, the EPA performed a removal assessment at the Site, which involved the collection of soil, concrete, water (surface water, wastewater, and groundwater) samples. The purpose of the sampling event was to further delineate specific areas of the Site (e.g., the UCV and portions of the Treated Wood Storage Area [TWSA}) and to determine whether Site materials were characteristic hazardous wastes.

EPA confirmed elevated levels of metals including arsenic, chromium, and copper in soil and concrete at the North and South Drip Pads and Treated Wood Storage Area and delineated the extent of metals contamination in soil in specific areas of the Treated Wood Storage Area. EPA determined that the metals-contaminated soil at the Site did not fail the TCLP analysis for metals and so is not a RCRA characteristic hazardous waste. However, some of the metals-contaminated concrete is a RCRA characteristic hazardous waste (for chromium), as determined by TCLP metals analyses. EPA also determined that the wastewater present in the Retort Chamber Sump and the UCV is a RCRA characteristic hazardous waste (for arsenic), as determined by a comparison of total metals results to TCLP limits.

For additional detail, please refer to POLREP 1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The Scope of Work for the IWTP removal action includes:

- Removal disposal of contaminated concrete in the North Drip Pad, South Drip Pad, and Treatment Building.
- Excavation and disposal of contaminated soil in the NDP, SDP, TWSA, and the Treatment Building.
- Decontamination and disposal (by recycling) the retort, 9 ASTs, and piping in the Treatment Building and 2 ASTs in the Tank Enclosure.
- Removal and disposal of liquids and sludge found or generated in ASTs, retort, and/or the UCV.
- Removal and disposal of the UCV.

During this reporting period (9/15/2014-9/20/2014), the following removal activities occurred:

- North Drip Pad: The concrete slab of the NDP was entirely broken up using an excavator, removed and stockpiled. This material will be disposed of as an F035 hazardous waste. Below the concrete slab is 4-6 inch layer of bedding sand overlying a 40-ml. liner. START will be collecting and analyzing samples of the bedding sand, but it is expected that the sand will be disposed of as non-hazardous waste. Further sampling and analysis of native soil, below the liner, is anticipated for next week.
- South Drip Pad: The concrete foundation for the support pilings was separated from the South Drip Pad floor by cutting with a concrete saw. When the SDP is removed, the concrete foundation and pilings will remain to support the roof over the SDP.
- Treatment Building: ERRS completed removal surface and overhead obsructions (motors, pumps, piping) during this reporting period. ERRS conducted confined space entries into the ASTs to remove dried sludge and decontaminate the tanks by pressure washing. All 9 ASTs in the Treatment Building and the retort have been decontaminated during this reporting period.
- Treated Wood Storage Area: START and ERRS conducted an extent of contamination survey in the West and Northeast TWSA. ERRS used an excavator to expose soil at various depths and START used an XRF to analyze soil samples for metals contamination. The EOC survey in ongoing and will continue during excavation to confirm all contaminated soil has been removed.
- Underground Containment Vault: The UCV is a 40' x 40' x 12' concrete vault used to store wastewater from the wood treatment process. The UCV has an approximate capacity of 120,000 gallons. Currently, approximately 3,000-4,000 gallons of wastewater is present in the UCV. During this reporting period, ERRS removed the 2 feet of soil from the top of the UCV, exposing the lid.
- Tank Enclosure ASTs: ERRS removed the siding from the Tank Enclosure adjacent to the North Drip Pad to gain access to the two ASTs located inside.

2.1.2 Response Actions to Date

An Action Memo was prepared and signed by EPA on August 14, 2014.

Five Underground Storage Tanks, located on the east side of the Maintenance and Treatment Buildings, were removed several years ago (date uncertain).

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

A Settlement Agreement between EPA and Colville Tribal Enterprise Corporation (CTEC) was signed on August 22, 2014. The settlement agreement provides funds from CTEC to EPA to conduct this removal action.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
F035 Concrete debris	Concrete	TBD	TBD	TBD	RCRA Subttile C landfill
Non-hazardous waste soil	Soil	TBD	TBD	TBD	RCRA Subtitle D landfill

F035 Wastewater	Liquid	TBD	TBD	TBD	PSC facility, Kent, WA

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Over the next operational period (9/22/2014-9/27/2014), the planned removal activities include:

- North Drip Pad: Remove the bedding sand and liner, then remove contaminated native soil as determined by the XRF analysis.
- South Drip Pad: No planned activity.
- Treatment Building: On Wednesday, September 24, a tank truck from PSC (Kent) will mobilize to site to remove the decontamination water/wastewater from the ASTs, retort sump, and UCV. When the water has been removed, ERRS will begin cutting down the ASTs and setting them aside for recycling.
- Treated Wood Storage Area: Continue excavation of the contaminated soil in the TWSA. Soil will be stockpiled for loading, transportation, and off-site disposal. During excavation, START will be analyzing soil samples with the XRF to confirm removal of contaminated soil.
- Underground Containment Vault: Approximately 3,000-4,000 gallons of wastewater will be removed from the UCV on September 24. Depending on resources available, the demolition and removal of the UCV may occur during the next reporting period.
- Tank Enclosure ASTs: Decontaminate, remove, cut, and scrap the ASTs in the Tank Enclosure.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

One additional START contractor was mobilized to assist with XRF analysis and air sampling.

2.4 Finance Section

2.4.1 Narrative

ERRS costs are as fo 9/18/2014. START costs are as of 9/13/2015. Estimated EPA costs are as of 9/20/2014.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,647,234.00	$1,294,283.00	$352,951.00	21.43%
TAT/START	$329,000.00	$108,370.00	$220,630.00	67.06%
Intramural Costs				
USEPA - Direct	$87,000.00	$14,000.00	$73,000.00	83.91%
Total Site Costs	$2,063,234.00	$1,416,653.00	$646,581.00	31.34%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Colville Tribe Environmental Trust Department

4. Personnel On Site

Colville Tribe Environmental Trust Department - 2
US EPA - 1
ERRS - 12
START - 3

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.

POLREP #2 Last Updated 9/20/2014