

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #7
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: 10/25/2014

Reporting Period: 10/20/2014 - 10/25/2014

1. Introduction

1.1 Background

Site Number:	10MZ	Contract Number:	
D.O. Number:		Action Memo Date:	8/14/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
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 (10/20/2014-10/25/2014), the following removal activities occurred:

- Treatment Building: The stem wall of the Retort Chamber Sump was sampled in 3 locations by drilling with a rotohammer. The samples were submitted for TCLP analysis. In 2 of the 3 locations, the analytical results were below TCLP limits. Approximately 50% of the TB floor has been broken up and the concrete removed.
- Treated Wood Storage Area: Removal work in the Western TWSA and the Northeastern TWSA has been completed. The Central TWSA has been 60% excavated, confirmed by XRF, backfilled, and compacted. The Northern TWSA has been 80% excavated, confirmed by XRF, backfilled, and compacted.
- Underground Containment Vault: The western wall of the UCV was determined to be connected through rebar and anchors to the foundation of the Treatment Building. ERRS decontaminated the lower/contaminated half of the western wall by mechanical abrasion. START conducted XRF screening at several location on the wall and determined that the surface contamination had been greatly reduced. START then collected 2 samples of the wall by drilling with a rotohammer and submitting the samples for TCLP analysis. Analytical results indicate concentrations below TCLP limits; therefore, EPA will leave the western wall in place, but has removed the other 3 walls. Excavation in the UCV is now complete.
- Off-site Transportation and Disposal: During this reporting period, a total of 131 trucks were loaded with contaminated material and sent off-site for disposal. 127 trucks (3,892.48 tons this week/9191.66 tons to date) of non-hazardous waste soil were sent to an appropriate disposal facility. Four trucks (124.09 tons this week/635.97 tons to date) of hazardous waste concrete were sent to an appropriate disposal facility.
- Tank Enclosure ASTs: All work in this operational unit was completed W/E 10/4/2014.
- North Drip Pad: All work in this operational unit was completed W/E 10/11/2014.
- South Drip Pad: All work in this operational unit was completed W/E 10/11/2014.
- Blackbird Drive: All work in this operational unit was completed W/E 10/18/2014.

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

Below is a summary of material transported off site during this reporting period:

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

F035 Concrete debris	Concrete	124.09 tons	multiple	TBD	RCRA Subtitle C landfill, Grandview ID
Non-hazardous waste soil	Soil	3,892.48 tons	multiple	TBD	RCRA Subtitle D landfill, Boardman, OR
F035 Wastewater	Liquid	0	multiple	TBD	US Ecology, Grandview, ID

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Over the next operational period (10/27/2014-11/1/2014), the planned removal activities include some or all of the following tasks:

- Treatment Building: Next OP: Use mechanical abrasion to attempt to remove the surface contamination from the east wall of the retort chamber sump where the sample that failed TCLP was collected. Remove the concrete floor. Excavate and remove contaminated soil. Future OP: Backfill the Treatment Building floor. Cover openings cut into the Treatment Building.
- Treated Wood Storage Areas: Next OP: Load NTWSA stockpile onto trucks. Begin CTWSA stockpiles. Future OP: Complete loadout of CTWSA stockpiles. Grade and compact all areas.
- Underground Containment Vault: Next OP: Backfill the UCV excavation.
- Off-site Transportation and Disposal: Next OP and future OPs: Load trucks for transportation and disposal of contaminated materials. Approximately 230 truckloads of material left to remove from the site.
- Tank Enclosure ASTs: All work completed.
- North Drip Pad: All work completed.
- South Drip Pad: All work completed.
- Blackbird Drive: All work completed.
- Long-term/Demobilization Tasks (10/20/2014-11/8/2014): Replace fencing around IWTP property; install reflectors to delineate roadways; assist with recycling of scrapped steel; general site cleanup; demobilize equipment and personnel.

2.2.2 Issues

None.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

ERRS costs are as of 10/23/2014. Estimated START costs are as of 10/25/2015. Estimated EPA costs are as of 10/25/2014.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$2,112,234.00	\$2,007,993.00	\$104,241.00	4.94%
TAT/START	\$329,000.00	\$237,000.00	\$92,000.00	27.96%
Intramural Costs				
USEPA - Direct	\$87,000.00	\$44,000.00	\$43,000.00	49.43%
Total Site Costs				
	\$2,528,234.00	\$2,288,993.00	\$239,241.00	9.46%

* 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 - 2
ERRS - 11
START - 1

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 #7 Last Updated 10/25/2014