

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #16
Demolition Plan, Revised HASP, Commence tank demolition and sludge removal
Samoa Pulp Mill

Samoa, CA
Latitude: 40.8049600 Longitude: -124.1933100

To: Harry Allen, EPA Region 9
Peter Guria, EPA Region 9
Dan Meer, EPA Region 9

From: Steve Calanog, OSC
Chris Weden, OSC

Date: 4/1/2015

Reporting Period: 1/24/2015 - 4/4/2015

1. Introduction

1.1 Background

Site Number:	A949	Contract Number:	EP-S9-12-01
D.O. Number:	0937	Action Memo Date:	7/30/2014
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:	6/30/2015
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 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 scrapping 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 primary concern is 11 ASTs containing 3-4 million gallons of highly caustic liquids (pH greater than 13). Five of these ASTs are not designed to store caustic liquids and periodic seismic activity (6.8 earthquake occurred off coast of Humboldt Co. 3/9/2014) has caused grave concern regarding their stability. Additionally, there are a half dozen ASTs containing 2000-3000 gallons of sulfuric acid (pH less than 1), 3,000 tons of corrosive sludges in uncontained areas, approximately 3000 gallons of turpentine, and several thousand containers of various types (i.e., compressed gas cylinders, paints/thinners, mercury containing

gauges and equipment).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Please refer to previous Polreps

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Since site work was halted last November, the USCG Pacific Strike Team and/or EPA's Contractor (Environmental Quality Management) periodically pumped accumulated rainwater from sumps to 20,000 gallon storage tanks.

Over the course of the past three months, the ERRS Contractor (EQM) has developed a demolition work plan and a revised Health and Safety Plan (HASP). The demolition plan is necessary to achieve access to the corrosive sludge that remains in many of the tanks that once held the 3 million gallons of highly caustic pulping liquors. The demolition plan and HASP were reviewed, commented, discussed, comments incorporated, and approved prior to mobilization.

Due to the scope of work, potential risk of injury, and the injury incident last fall, this site has been scrutinized by every level of EPA Region 9 management. Several meetings were held as the revised HASP evolved.

In addition to the HASP activities, Realm Engineering was subcontracted to provide a stamped demolition plan to identify technical approaches to critical lifts and safe crane operations. Appropriate lift and hoist/demolition information developed was included in the RFP for Crane Operations.

Redwood Electric was subcontracted to confirm a Zero Mechanical State in the work areas. EQM's Hazardous Energy Control Program (SOP HS-Fld-5) will be utilized as general guidance to establish safe operations as it pertains to Hazardous Energy Control. The HASP has been updated with the project specific Hazardous Energy Controls, LO/TO.

2.1.2 Response Actions to Date

27Mar2015: OSC Calanog met with CalOSHA and the ERRS contractor regarding the work-plan in Redding, CA. CalOSHA approved the plan after questions and discussion and advised that they would be visiting the site periodically.

30Mar2015: OSC Weden met with the ERRS Response Manager and ERRS Health and Safety Officer to review and prepare for extensive on-site health and safety training program.

31Mar2015: All ERRS staff and subcontractors received part one of their in-depth site specific health and safety training. Site specific hazards and work protocols were discussed, followed by a rigorous fall protection training session. This included hands-on harness donning and doffing and man-lift operation. Finally, a 40 question test was administered and discussed.

After lunch, the crew policed the site for slip, trip, fall, and flat tire hazards. Cleared areas of debris for safe tank demolition operations and began staging equipment.

01Apr2015: All ERRS staff and subcontractors received part two of their in-depth site specific health and safety training. A thorough review of confined space entry procedures was presented followed by a quiz and discussion. SHN o/s to take pipe insulation samples for asbestos analysis. Realm engineer o/s to review pick points and general tank demolition advice.

02Apr2015: Began removal of solidified sludge from Tank 9. Asbestos results received, all non-detect. Began sampling pipes in rack along tanks 140-142 and began removal of pipes. All liquids were carefully drained into totes for assessment. Stocked emergency supplies 4th floor of Recovery Boiler building in case of earthquake/tsunami evacuation.

03Apr2015: Solidified sludge removal from Tank 9 completed. Tank 9 was pressure washed following permitted confined space entry o/s mtg. Began removing sludge from Tank 8. Access hole cut into Tank 142 for assessment of remaining liquid over sludge. Began removing outer insulation on Tank 36.

04Apr2015: Continue to solidify sludge in Tanks 7 & 8 and adjacent concrete black liquor sludge containment #2. Completed removal of pipe rack along Tanks 140-142. Completed removal of outer insulation around Tanks 36-38. Sample obtained of sludge from "Lime Mud" Tank 19. HBHD requested that Tank 19 be left intact for future use. Sample also obtained from Sulfur Tank. H&S Officer conducted high volume air sampling around Tank 9 during cutting torch activity. Began pressure washing steel for re-use and continued storm water management and dust control onsite. Replaced tarps over solidified sludge due to rain forecast.

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

On-going

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal	Recycled
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Caustic liquids	liquids	2.7m gallons				To date - 2.7 million gallons Kapstone Paper Company, Longview, WA
Sulfuric Acid - Re-usable	liquids	6k gallons				Purchased by Valley Acid, Stratford, CA (11/13)
Sulfuric Acid - Waste	liquids	4k gallons		x	x	21st Century Environmental Management of CA, LP
Hydrochloric Acid - Waste	liquids	2,100 gallons	011138259 JJK	x	x	
Corrosive sludges	semi-solids	9k tons			x	Recology, Vacaville, CA To date: ~300 tons
Turpentine	liquids	3k gallons				
Lab Chemicals	various	~2k containers	0000990296DAT	x	x	21st Century Environmental Management of CA, LP
"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

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

From an operations and cost standpoint, several variables still exist. The total sludge volumes and the ratio of fly-ash to sludge for solidification is uncertain. Further, the sludge may vary considerably by tank and will be profiled separately. Some of the sludge may require disposal at a Subtitle C facility. As this project progresses, the impacts on schedule and costs will become more clear. By Mid-May a more accurate evaluation of schedule and costs should be available.

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

No information available at this time.

4. Personnel On Site

- 1 - OSC
- 4 - PST
- 1 - HBHD
- 16 - ERRS (12 - EQM, 4 - Global)

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.