

Treoil Industries Site Overview

August 1, 2018

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Reduction Program

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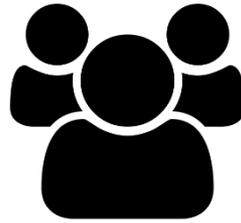
Community Outreach and
Environmental Education
Specialist,
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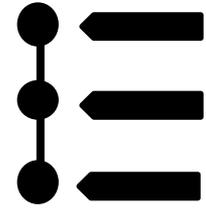
Treoil Industries Site Overview



Location



Management



History



Concerns



EPA Removal



What's Next?



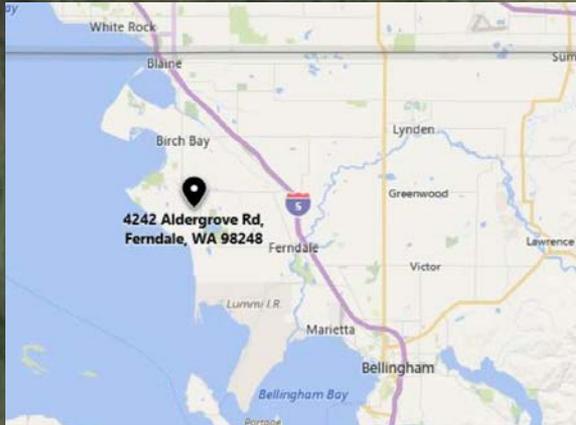
Treoil Industries

4242 Aldergrove Rd
Ferndale, WA

- 34 acres of industrial property
- 1.8 miles from Strait of Georgia



March 2017



Bing



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Treoil: Site Management

	Management Areas
Hazardous Waste and Toxics Reduction (HWTR)	Hazardous Waste Enforcement
Water Quality (WQ)	Industrial Stormwater General Permit
Toxics Cleanup Program (TCP)	Site Investigations, Hazardous Sites List

	Management Areas
EPA Region 10 – Emergency Management Program	Emergency Waste Removal

 Whatcom County	Management Areas
Planning & Development Department	Business Permits, Fire Marshal
Health Department	Site Investigations



Treoil: History & Environmental Investigations

1991



Ecology issued a **Notice of Violation** for the **discharge of spilled material** to a drainage ditch that eventually leads to the Strait of Georgia.

1994



Site placed on **Ecology's Confirmed and Suspected Contaminated Sites List**.

2000-2001



Ecology and **Whatcom County** conducted a **Site Hazard Assessment** under the Model Toxics Control Act (MTCA). The site was listed on the Hazardous Sites List for confirmed contamination of **soils with metals, petroleum hydrocarbon, and polycyclic aromatic hydrocarbons (PAHs)**. The site was ranked through the **Washington Ranking Method** (WARM) with a score of **"2."** (Sites are ranked between 1 and 5, where "1" represents the highest level of risk to human and environmental health and a "5" the lowest.)

The **EPA** also conducted a **Removal Site Evaluation** to determine potential threats of discharge to waters of the United States and did not find a threat at that time but made recommendations for cleanup.

2006

[Multi-agency]

A **multi-agency advisory visit** provided technical assistance and identified numerous site concerns.



Treoil: History & Environmental Investigations

2014



Ecology received an **additional formal complaint** regarding the site. Ecology's **HWTR** and **Whatcom County** conducted an **initial investigation** and a **dangerous waste compliance inspection** identifying poor containment practices with **waste and oily substances on the ground**.

2015-2016



Ecology's **HWTR Program** initiated enforcement action in the form of an **Administrative Order** and an **Amended Administrative Order** to the property owners as a result of non-compliance with Dangerous Waste Regulations. Inspectors visited the site several times to note progress toward compliance. During one of these visits, conducted jointly with **Ecology's WQ Program**, it was determined that the site met qualifications for an **Industrial Stormwater General Permit**

2017



Ecology monitored site progress and found conditions were not in compliance with the **enforcement order**. Due to concerns with imminent threats to human health and the environment, **Ecology** contacted the **EPA** for assistance. **EPA removal** began March 2017 and completed by August 2017.

Present



Ecology programs continue to monitor site progress and compliance.



Concerns



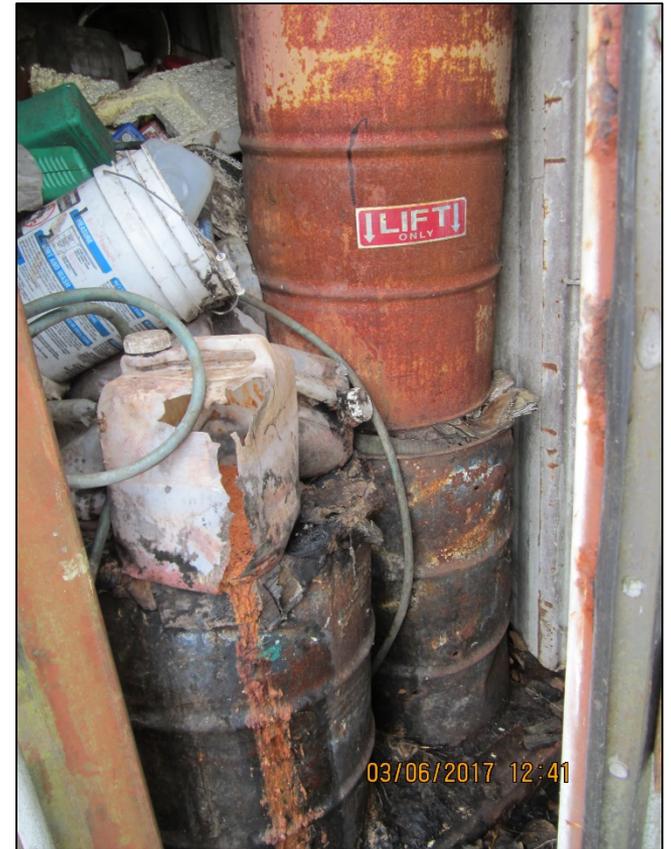
Overflowing containers and leaking tanks



Evidence of spills to unmapped drainage



Conditions Outside



Conditions Outside



Tanks actively leaking

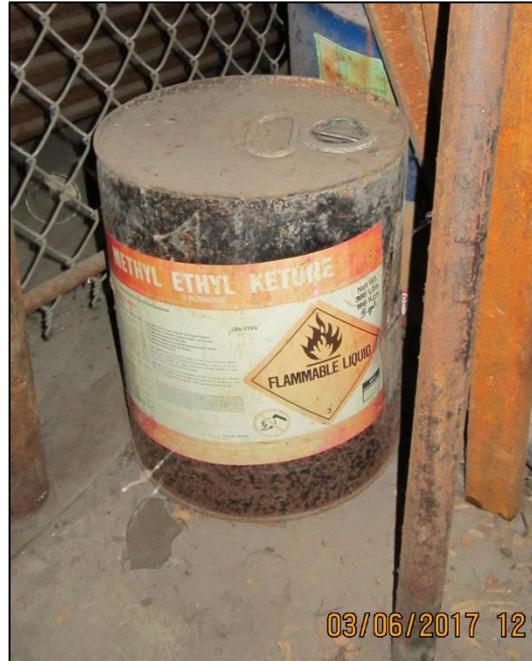
Dead vegetation – Southwest corner - property low point



Warehouses



Drums of unknowns



Old chemicals



Floor trench drain



Warehouses



Containers with unknown contents,
lab chemicals, tall oil or biodiesel
related oils and reagents



EPA 2017 Emergency Removal

- Began March 13, 2017
- Completion August, 2017
- Remove CERCLA chemicals
- Remove pumpable tail oil
- Provide final recommendation for next steps (assessment, etc.)



EPA 2017 Emergency Removal

6,750 gallons of crude glycerin

93,000 gallons of liquid tall oil and tall oil derivative wastes

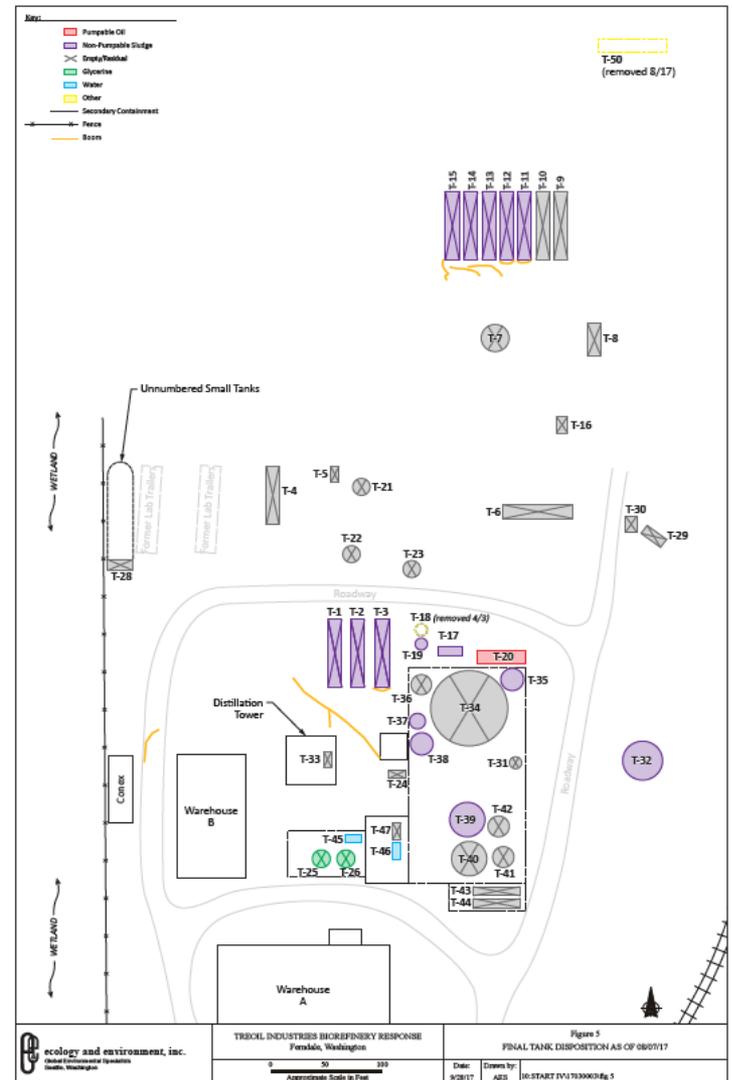
275 tons of contaminated soil, sludge and debris

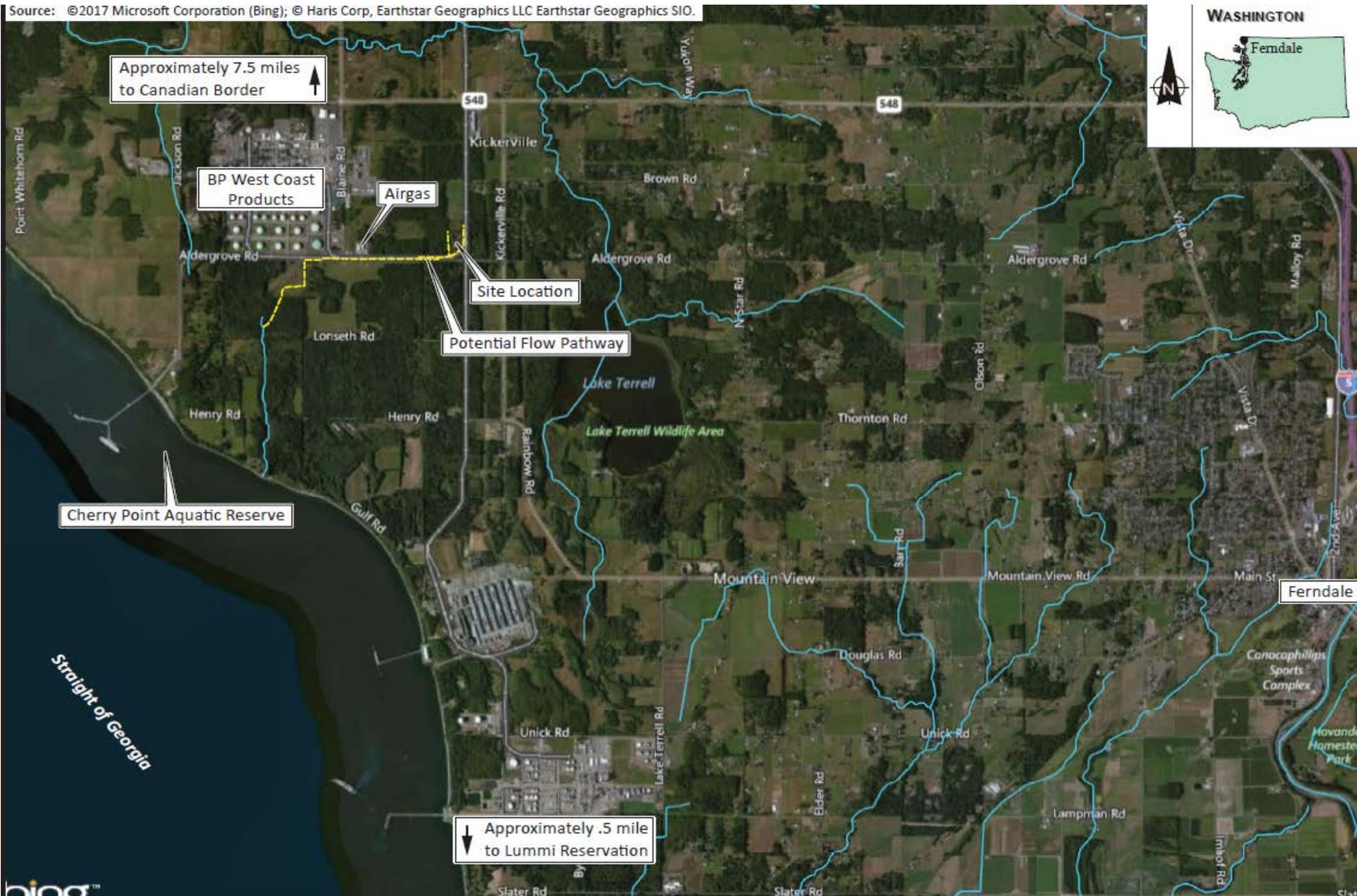
430 containers, **35** drums and **9** cylinders of hazardous chemicals

8 cubic yards of asbestos containing material

Remaining – 113,423 gallons

Approximate Removal Costs:
EPA CERCLA - \$248,000
OPA Coast Guard - \$795,000





Approximately 7.5 miles
to Canadian Border

BP West Coast
Products

Airgas

Site Location

Potential Flow Pathway

Cherry Point Aquatic Reserve

Approximately .5 mile
to Lummi Reservation



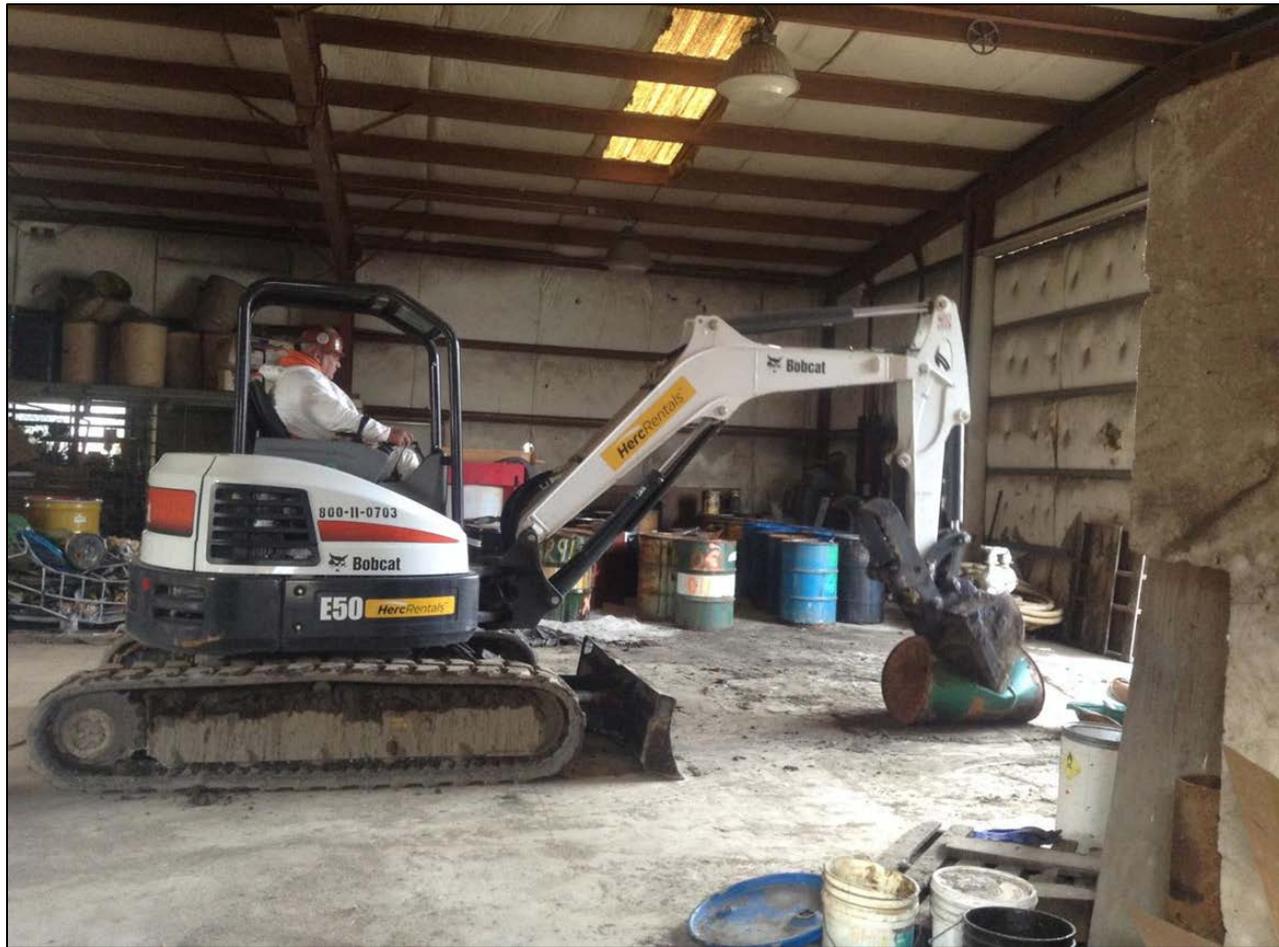
Solidification of oils for disposal



Overpacking of chemicals



Crushing drums for disposal



Buildings Following EPA Removal



Buildings Following EPA Removal



Buildings Following EPA Removal



Before



After



HWTR Sampling – Tank Contents

August 2, 2017

- Tanks 1 – 3
- Tank 20
- Tanks 12 & 13



HWTR Sampling – Tank Contents

Results

August 2, 2017

Tanks 1 – 3, 12 & 13 (conclude that tanks 11 – 15 are all similar or same material)

- Fish bioassay – pass
- Semi-volatile organics – not dangerous waste

Tank 20

- Fish bioassay - pass
- Inconclusive though detections of some chemicals of concern

September 28, 2017

Returned to re-sample Tank 20

- Test shows halogens > 100 ppm; therefore dangerous waste



Ongoing Ecology Actions

 DEPARTMENT OF ECOLOGY State of Washington	Management Areas
Hazardous Waste and Toxics Reduction (HWTR)	Amended Order still in effect for remaining materials
Water Quality (WQ)	Compliance with Industrial Stormwater General Permit
Toxics Cleanup Program (TCP)	Site Investigations, Hazardous Sites List



United States
Environmental Protection
Agency



Whatcom County

Interagency Cooperation

“Eyes on developments at site”



EPA Actions Following Removal

- Sampling Strategy Memorandum submitted to Ecology (E & E 2017b)
- Communication to property owner regarding the SPCCC program, 40 C.F.R. Part 112, and need for formal tank integrity inspections and testing prior to operating



Thank you 😊



Treoil Site
Information?



DEPARTMENT OF
ECOLOGY
State of Washington

<http://bit.ly/Ecology-Treoil>



https://response.epa.gov/site/site_profile.aspx?site_id=12015



Questions?

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