



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

SUPERFUND & EMERGENCY  
MANAGEMENT DIVISION

July 7, 2021

**MEMORANDUM**

**SUBJECT:** Approval for Funding Ceiling Increase for the Time-Critical Removal Action at the Onalaska Wood Pyrolysis Site, Onalaska, Lewis County, Washington

**FROM:** Brooks Stanfield, On-Scene Coordinator  
Spill Prevention, Assessment and Removal Section

**THRU:** Wally Moon, Section Chief  
Spill Prevention, Assessment and Removal Section

Beth Sheldrake, Branch Chief  
Emergency Management Branch

**TO:** Calvin J. Terada, Director  
Superfund and Emergency Management Division

**SITE ID:** 10TH

**I. PURPOSE**

The purpose of this Action Memorandum Amendment is to request and document approval of a ceiling increase for the Time-Critical Removal Action described herein for the Onalaska Wood Pyrolysis site (Site) located at 1674 State Highway 508, Chehalis, Lewis County, Washington.

This selected Time-Critical Removal Action meets the criteria for initiating a removal action under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

**II. SITE CONDITIONS AND BACKGROUND**

Refer to the original Action Memo signed May 18, 2021.

**A. Site Description**

**1. Removal site evaluation**

Refer to the original Action Memo signed May 18, 2021.

**2. Physical location**

Refer to the original Action Memo signed May 18, 2021.

### **3. Site characteristics**

Refer to the original Action Memo signed May 18, 2021.

### **4. NPL status**

The Site is not listed on the National Priorities List (NPL) nor has it been proposed for listing.

## **B. Other Actions to Date**

### **1. Previous Actions**

Refer to the original Action Memo signed May 18, 2021.

The start date of this Time-Critical Removal Action was June 14, 2021.

### **2. Current actions**

The Time-Critical Removal Action is currently ongoing and expected to be completed by September 1, 2021.

## **C. State and Local Authorities' Roles**

### **1. State and local actions to date**

Refer to the original Action Memo signed May 18, 2021.

### **2. Potential for continued State/local response**

Refer to the original Action Memo signed May 18, 2021.

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Refer to the original Action Memo signed May 18, 2021.

There were no additional threats identified during the removal action.

## **IV. ENDANGERMENT DETERMINATION**

Refer to the original Action Memo signed May 18, 2021.

## **V. EXEMPTION FROM STATUTORY LIMITS**

This proposed Removal Action does not require any exemption from statutory limits.

## **VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Action**

#### **1. Proposed Action Description**

Refer to the original Action Memo signed May 18, 2021.

The planned removal activities, described in the original Action Memorandum, have not changed. The estimated cost of those actions has, however, increased significantly as described below.

During the Removal Site Evaluation (RSE), EPA was not able to safely access and evaluate the contents of each of the nearly three hundred totes and five aboveground storage tanks (ASTs) on the site. Drawing on the knowledge of inspectors from Ecology's Hazardous Waste and Toxic Reduction program and sampling of accessible totes, EPA determined that totes and ASTs contained wood vinegar that fell into two different waste streams, each assigned its own estimated unit cost for transportation and disposal. It was also determined that portions of these vessels were filled with wood vinegar liquids while some volume was also comprised of a third waste stream, wood tar. With limited access, EPA inspected and sampled several dozen totes thought to be representative of the waste streams that were stockpiled throughout the facility and drew assumptions as to the likely percentage of each waste stream in the overall volume of hazardous waste. Following initiation of removal activities in the field when all containers could be safely assessed, it was determined that there was far less consistency in the contents of totes than had been assumed during the RSE and thus volume estimates of the different waste streams were, in some cases, off significantly. The increase in volume of certain wastes also significantly increased the transportation and disposal costs.

The transportation and disposal costs for each waste stream also increased dramatically between the time EPA developed its independent government cost estimate (IGCE), and the receipt of formal bids from treatment, storage, and disposal facilities (TSDFs) due to a sudden shortage of capacity at hazardous waste incinerators nationwide. As capacity shortages worsened during the course of conducting field operations, the availability of TSDFs and corresponding costs have continued to change almost daily. The sudden capacity shortage at incinerator facilities is reportedly due to an increase in business operations following the lifting of COVID-19 restrictions in some areas of the United States while simultaneously certain discrete locations have experienced an increase in infections leading to a reduction in labor to operate the facilities.

a. Consolidation and disposal of liquid hazardous waste

The majority of contaminated liquids will be pumped out of the totes, ASTs, and secondary containment and bulk-transported in properly placarded 5,000-gallon vacuum trucks or tanker trucks to an appropriate disposal facility.

b. Consolidation and disposal of solid hazardous waste

After totes and other vessels have been decanted of liquids, the remaining solid tar material in totes, ASTs, and containment will be solidified using available sawdust material on site, loaded into one to one and a half cubic yard "wrangler" boxes designed to handle hazardous waste. This boxed material will be staged and transported on placarded trucks to an appropriate disposal facility. The leftover empty totes and ASTs will be crushed for disposal as non-regulated solid

waste. The containment area will be decontaminated of tar residue and left with valves open to prevent the continued accumulation of rainwater.

c. Assessment and characterization of known and suspected hazardous wastes

There are an estimated 150 containers of unknown origin stored behind totes in the dry kiln building that EPA was previously unable to safely access. Any uncategorized containers will be assessed using field analytical techniques to properly categorize the contents for disposal. Containers confirmed through field analytical procedures to contain hazardous waste will be segregated by Department of Transportation class, bulked in overpack containers, labeled, and transported off-Site to an appropriate hazardous waste disposal facility on placarded trucks.

d. Post-Removal Site Controls

Due to the scope of removal activities planned for the Site, post-removal site controls are not anticipated.

The Site is not listed or proposed to be listed on the National Priorities List. The work described in this Action Memorandum should not impede any future removal or remedial activities at the Site.

## **2. Description of alternative technologies**

Refer to the original Action Memo signed May 18, 2021.

## **3. Engineering Evaluation/Cost Analysis (EE/CA)**

Refer to the original Action Memo signed May 18, 2021.

## **4. Applicable or relevant and appropriate requirements (ARARs)**

Refer to the original Action Memo signed May 18, 2021.

## **5. Project Schedule**

The Time-Critical Removal Action was initiated June 14, 2021 and is expected to be completed by September 1, 2021.

## **B. Estimated Costs**

The EPA estimated extramural costs are shown below and represent the worst-case scenario based on information available at the time of this funding ceiling increase approval memo.

	Original Estimate	Amended Estimate
Emergency and Rapid Response Services (ERRS)	\$712,202	\$1,586,060
Superfund Technical Assessment and Response Team (START)	\$ 88,548	\$88,548
Contingency (10%)	\$ 80,075	\$167,461
Total Removal Action Project Ceiling	\$880,825	\$1,842,069

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective 2 October 2000. These estimates do not include pre-Judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustration purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

If completion of the proposed removal action should be delayed or not taken large quantities of liquid hazardous substances will remain as potential human health and ecological threats. With limited means to stabilize the abandoned waste the risk of release will increase over time.

**VIII. OUTSTANDING POLICY ISSUES**

None.

**IX. ENFORCEMENT**

Refer to the original Action Memo signed May 18, 2021.

**X. RECOMMENDATION**

This decision document represents the selected removal action for the Onalaska Wood Pyrolysis Site, located at 1674 State Hwy 508, Chehalis, Lewis County, Washington, developed in accordance with CERCLA, as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Onalaska Wood Pyrolysis Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling if approved will be \$1,842,069. Of this, as much as \$1,842,069 comes from the Regional Removal Allowance.

**XI. APPROVAL / DISAPPROVAL**

APPROVAL

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Calvin J. Terada, Director  
Superfund and Emergency Management Division

DISAPPROVAL

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Calvin J. Terada, Director  
Superfund and Emergency Management Division