



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

**Emergency Planning Community Right-to-Know Act Section 312
Clear Air Act 112(r) Risk Management Plan
On-Site Compliance Inspection Report
Columbia Pulp LLC**

COMPANY INFORMATION

Name: Columbia Pulp LLC
Mailing Address: 115 East Main Street
Dayton, Washington 99328
Website: <https://columbiapulp.com/>

FACILITY INFORMATION

Name: Columbia Pulp I LLC
Physical Address: 1351 Highway 261
Starbuck, Washington 99359
Latitude/Longitude: 46.568133 / -118.194110
Facility ID#: WAH000057045
FRS ID#: 110066989441
EJ Concerns: No (57%)

CONTACT INFORMATION

Name: Mr. Andrew Hudec
Title: Environmental Coordinator
Phone Number: (509) 288-4892
E-mail: andrew.hudec@columbiapulp.com

INSPECTION DETAILS

Date of Inspection: July 13, 2021
Time: 9:00 a.m.
Inspector: Erin Williams, EPCRA / RMP Inspector and EPCRA Coordinator
Bob Hales, EPCRA / RMP Inspector
Edward Johannes, EPCRA / RMP Inspector-in-Training

REPORT PREPARED BY

Inspector: Erin Williams
Report Date: February 1, 2022

GENERAL INFORMATION

Columbia Pulp LLC operates a new pulp mill in Starbuck, Washington, which uses waste wheat straw to create pulp for paper products as well as biopolymers for a variety of industrial uses. In April 2021, Mr. Peter Hartmann, Central & Eastern Washington - HazMat & Continuity of Government Planning Program Manager, and Mr. Ashley Strickland, Columbia County LEPC Director, reached out to EPA Region 10 EPCRA Program (EPA) about Columbia Pulp LLC. At that time, Columbia Pulp had never

submitted a Tier II for the facility in Starbuck, Washington. Through coordination with the SERC and LEPC, EPA initiated an Off-Site Compliance Monitoring (OfCM) at the facility to assist in determining the chemicals and amounts the facility stores on-site and if they are required to submit annual Tier II chemical inventory reports. On June 2, 2021, the facility came into compliance with the EPCRA reporting requirements. See the OfCM Report dated June 2, 2021, for complete background (Attachment A).

At the time of the OfCM, EPA Region 10 EPCRA inspectors were conducting limited onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC). After the OfCM was completed, EPA Region 10 planned to coordinate with facilities to schedule an onsite inspection, as necessary. EPA is prioritizing follow-up on-site inspection at new facilities and decided to conduct an on-site inspection at Columbia Pulp.

PURPOSE

The purpose of this On-site Compliance Inspection (OCI) was to conduct a follow-up compliance inspection under Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) and to assist in fostering communication between Columbia Pulp and local emergency responders. This was a joint inspection with the Clean Air Act Risk Management Program (RMP). Columbia Pulp is not currently registered as an RMP facility.

A pre-inspection letter was emailed on June 28, 2021, to Andrew Hudec, Environmental Coordinator, informing the company of the inspection scheduled for July 13, 2021 (Attachment B).

CHEMICALS OF CONCERN

The following is a list of Extremely Hazardous Substances (EHS) and Hazardous Chemicals stored onsite at the facility over the reporting threshold. See the attached Tier II for maximum inventory amounts for each chemical (Attachment C).

Chemical Name	CAS Number
Sulfuric Acid	7664-93-9
Hydrogen Peroxide	7722-84-1
Sodium Hydroxide 30-54% - Olin (GS09938)	1310-73-2
Ppp-003	00-00-0
Purate	7775-09-9

EPCRA TIER II REPORTING HISTORY

Did the facility submit the 2020 Tier II report to the SERC?

YES ☒

NO ☐

If Yes, Date the Tier II was submitted: 5/25/2021

SERC Agency: Washington State Department of Ecology
Program Coordinator: Ms. Diane Fowler, Community Right-to-Know Specialist
Address: Washington State Emergency Response Commission
Ecology Community Right-to-Know Unit
P.O. Box 47659
Olympia, Washington 98504
Phone Number: (800) 633-7585
Email: epcra@ecy.wa.gov
Website: <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Emergency-Planning-Community-Right-to-Know-Act/Tier-Two-Reporting-Requirements>

Did the facility submit the 2020 Tier II report to the LEPC? YES ☒ NO ☐

If Yes, Date the Tier II was submitted: 5/25/2021

LEPC County: Columbia County Emergency Management
Program Coordinator: Mr. Ashley Strickland, Director E911, Emergency Management
Address: 341 East Main Street, Suite 100
Dayton, Washington 99328
Phone Number: (509)382-3928
Email: ashley_strickland@co.columbia.wa.us

Did the facility submit the 2020 Tier II report to the Fire Department? YES ☒ NO ☐

If Yes, Date the Tier II was submitted: 5/28/2021

Fire Department: Columbia County Fire District #3
Contact: Mr. Alan Harris
Address: 111 Patit Road
P.O. Box 66
Dayton, Washington 99328
Phone Number: (509) 382-4281
Email: (b) (6)

INSPECTION ENTRY

At approximately 9:00 am on July 13, 2021, the EPA inspection team of Ms. Erin Williams, Mr. Bob Hales and Mr. Edward Johannes arrived at the Columbia Pulp Facility in Starbuck, Washington. The EPA team was accompanied by local and regional emergency planners and first responders, including Mr. Ashley Strickland with the Columbia County LEPC; Mr. Pete Harman with the Washington SERC; Mr. Scott Lancaster, Mr. Justin Destito and Mr. Tanner Denson with the Washington State Patrol; Mr. Jerry Fin with local Fire District; and Mr. Mike Spring, County Commissioner.

The EPA inspection team and local and regional emergency planners and first responders were met by Mr. Kyler Lovegrin, Plant Manager, Mr. Andrew Hudec, Environmental Coordinator, Mr. Tyler Montegrew, Acting CEO, and Mr. Dusty Swartz, Safety Coordinator. Everyone met in the conference room for introductions, an overview of EPCRA and RMP from EPA and facility operations from facility staff.

Ms. Williams explained the purpose of the inspection as a follow-up to the OfCM which was completed in June 2021. Ms. Williams showed her credential and thanked the Pulp Mill staff for allowing them to tour the facility and for including the local and regional emergency planners and first responders.

Columbia Pulp personnel provided an overview of the facility. The facility first brought product on-site in 2019 but then closed down in March 2020 due to COVID-19. In May 2021, production started again. Columbia Pulp employs 74 employees at the Starbuck Mill which operate in 4 shifts around the clock, 7 days a week. Typically, there are 30-40 employees on-site during daytime hours and 12-15 during nights and weekends. Operations are the same but during the day, engineering and management staff is also on site. At the time of the inspection, the facility was producing around 20 tons of product per day. The facility has the capacity of 400 tons per day.

The facility has two chemical handlers but plans to train two additional employees. In addition to the reported chemicals, the facility has three propane forklifts on-site. Facility staff provided safety instructions before the site tour. The EPA inspectors confirmed it was ok with Columbia Pulp to take photographs during the facility tour. Photographs are included in Attachment E.

ON-SITE OBSERVATIONS

The facility tour followed the production process. First the rail siding where chemicals are offloaded was observed. There are three storage tanks next to the rail siding (photo 1). The peroxide is always unloaded from the top into the two silver tanks on the right. The caustic can be unloaded from the top and the bottom into the white tank on the left. The two products are in separate containment areas. The biopolymer is also unloaded by rail, across the catwalk, and into the facility (photo 4). In addition to the rail siding, there is a truck offload pad (photo 4 and 5). The pad is rarely used unless product is not available by rail. The totes on the truck pad were empty and clean for storage of future deliveries of the biopolymer.

After touring the outside transfer and storage areas, the tour moved inside the facility. The facility always stores their proprietary product, PPP-003, in 500-gallon totes (photo 6). Additionally, Purate is stored inside the facility. Purate is an EPA Registered Pesticide (EPA Reg #1706-242) produced by Nalco Company LLC based out of Naperville, Illinois (photos 7-9). Purate is used to prevent mold and is mixed into the slurry during the production process. The last chemical observed onsite was Sulfuric Acid. It was stored in the back of the facility in a temporary containment area (photo 11). The sulfuric acid is used for water treatment.

During the tour, no additional reportable hazardous substances were identified. However, it was noted that Columbia Pulp stores and handles 78% sulfuric acid in their process. Sulfuric acid is considered an Extremely Hazardous Chemical and is subject to RMP. The maximum amount of sulfuric acid recorded on the Columbia Pulp Tier II report is over the RMP threshold of 10,000-pound, however the average amount is under the 10,000-pound threshold. If Columbia Pulp stores sulfuric acid over the 10,000-pound threshold they are required to have a Risk Management Plan under Section 112(r) of the clean air act.

CLOSING CONFERENCE

After the facility tour, everyone met back in the conference room. The EPA staff thanked Columbia Pulp personnel for their time and for allowing them to tour the facility in follow-up to the Off-site Compliance Inspection.

POST INSPECTION FOLLOW UP

There was no post inspection follow-up between EPA and Columbia Pulp.

REPORT CERTIFICATION

This is to certify that I, Erin Williams, was the lead inspector at this facility. I have verified the accuracy and completeness of this inspection report.

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.02.03 11:00:51 -08'00'

Signature

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.02.03 11:01:38 -08'00'

EPCRA Coordinator/Approval

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2022.02.03 11:59:26 -08'00'

RMP Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A Sullivan
Date: 2022.02.04 08:33:28 -08'00'

Land Enforcement Section Chief/Approval

ATTACHMENTS

- A) OfCM Report and follow-up
- B) Pre-Inspection Letter
- C) Tier II
- D) Photos
- E) Inventory and Training Protocols