



R. Newman

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

October 6, 1992

CERTIFIED MAIL

Mr. Satpal S. Sidhu
Treoil Industries, Ltd.
Cherry Point Industrial Park
Post Office Box 2399
Ferndale, WA 98248

Dear Mr. Sidhu:

RE: Penalty No. DE91WR-N259 *91WR-N259*

Upon review of our files, we have found no record of payment for Penalty No. DE91WR-N259, which was issued on January 7, 1992, in the amount of \$1,000. This penalty became due on August 7, 1992. The assessment is now in excess of 60 days delinquent.

If we do not hear from you within 30 days from receipt of this letter, we will be forced to turn this account over to a collection agency pursuant to RCW 19.16.500. Therefore, it is imperative that you contact or send in your remittance immediately to: Department of Ecology, Cashiering Unit, P.O. Box 5128, Olympia, WA 98503-0210.

To ensure proper credit, return the second copy of this letter with your remittance in the enclosed envelope.

If you wish to discuss any matters relating to this penalty, please contact the following individuals:

Marian Bruner, (206) 459-6854, matters relating to an appeal or issues concerning penalty.

Mark Bibeau, (206) 459-6035, matters relating to the payment of the penalty.

Sincerely,

Mark Bibeau, Unit Supervisor
General Accounts Receivables

Enclosures

cc: Enforcement Unit

Harold S. Zimmerman, Chairman
Judith A. Bendor, Member
Annette S. McGee, Member

William A. Harrison
Administrative Appeals Judge

Judy Greear, Hearings Coordinator
Robyn Bryant, Administrative Assistant



*R. Newman
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Pollution Control Hearings Board
Shorelines Hearings Board
Forest Practices Appeals Board
Hydraulics Appeals Board

(206) 459-6327
(SCAN) 585-6327
(FAX) (206) 438-7699

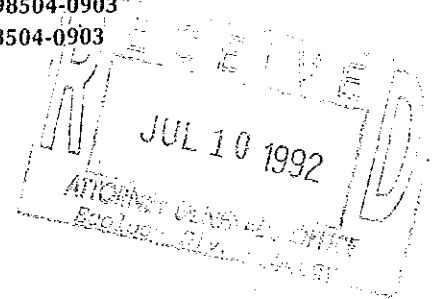
STATE OF WASHINGTON

ENVIRONMENTAL HEARINGS OFFICE

Location: 4224 - 6th Avenue SE, Bldg. 2, Rowe Six, Lacey, WA 98504-0903
Mailing Address: MS: PY-21, P.O. Box 40903, Olympia, WA 98504-0903

July 8, 1992

Treoil Industries, LTD
Cherry Point Industrial Park
Post Office Box 2399
Ferndale, WA 98248



RE: PCHB No. 92-114
TREOIL INDUSTRIES, LTD. v. DOE (DE 91WQ-N259)

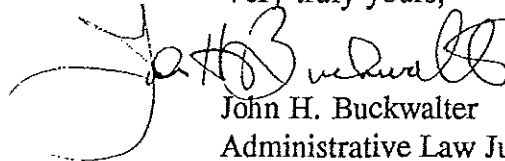
Dear Sir:

Enclosed is an Order of Dismissal in this matter.

This is a FINAL ORDER for purposes of appeal to Superior Court within 30 days, pursuant to WAC 371-08-220.

The following notice is given per RCW 34.05.461(3): Any party may file a petition for reconsideration within 10 days and serve it on the other parties. The term "file" means receipt.

Very truly yours,


John H. Buckwalter
Administrative Law Judge

JHB/jg/TREOIL
enc.

cc: James K. Pharris - DOE
John Williams - DOE

I certify that I mailed a copy of this document to the persons and addresses listed thereon, postage prepaid, in a receptacle for United States mail at Lacey, Wa. on 7/8/92.
John Williams

TO: John Glynn, ^{JKF} NWRO
THROUGH: Kevin Fitzpatrick, NWRO (KCF)
FROM: Bob Newman RA
SUBJECT: Recommendation for Notice of Violation No. DE 91WQ-N257
and Notice of Penalty No. DE 91WQ-N259 for:

Treoil Industries, LTD.
Cherry Point Industrial Park
P. O. Box 2399
Ferndale, WA 98248

DATE: December 12, 1991

SUMMARY

This case involves a discharge of pine oils, a derivative of the pulp and paper industry. The facility distills this product to various grades of industrial oils, pitches, and resins.

BACKGROUND

The Treoil facility is located at 4242 Alder Grove Road, Ferndale. Non-contact cooling water, boiler blowdown, and stormwater from the facility are discharged to a ditch/channel which joins the roadside ditch along Alder Grove Road for approximately 0.9 miles in a westerly direction past Liquid Carbonic and towards the southeasterly edge of the ARCO refinery. The roadside ditch then heads south on Gulf Road and eventually enters the Strait of Georgia near the BP oil refinery through an unnamed tributary to the Strait of Georgia (WRIA 01-0101).

In December of 1989 this facility had a spill of the same material during start up operations of the facility. The response of the facility to this spill after being notified that the spill was required to be cleaned up was adequate but slow. Formal enforcement action was not taken on this violation. It was discovered during the investigation of this spill that the facility planned on discharging non-contact cooling water to the ditch. The facility was informed that they needed an NPDES permit for this discharge. The permit was applied for and at this time has not been issued.

On October 15, 1991 NWRO spill personnel were informed of a spill of pine oil from the Treoil facility by Bill Kidd of the ARCO refinery. He stated that the oil was contained in the ditch along Alder Grove Road. Kirk Smith of NWRO responded to the report and contacted the facility (see attached spill memo) on October 16, 1991.

John Glynn

Notice of Violation/Penalty DE No. 91WQ-N257, N259
Treoil Industries, LTD.

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Kirk and I made arrangements to visit the facility on October 18, 1991 and check on cleanup of the material. Kirk was unable to go on October 18, so I did the inspection alone. The operators appeared to be just beginning to clean up the straw that had been spread to pick up the material. Since I had not had the explanation of how the incident occurred I asked Satpal Sidhu, Vice President of Operations what had happened. The story I heard was slightly different than Kirk's memo. Satpal indicated that someone had left a raw product tank valve open allowing product into the process area containment. After heavy rainfall on October 14, the switch was thrown to pump the stormwater out of the containment without checking the contents of the sump. (During a permit inspection on December 10, 1991 with Pam Elardo of NWRO, the explanation of how the spill occurred was the same as in Kirk's memo.)

The material discharged to the small settling/separator sump on site, then to the channel north of the railroad tracks for approximately 0.3 miles, the flow then crosses under the tracks and to the ditch along Alder Grove Road. After being notified of the spill by ARCO personnel, straw was spread into the product to control further spread. Using straw is minimally adequate to control and contain the product during very cool temperatures.

If this product ever spilled during warm weather, and the spill was not noticed by the facility operators, the product would hardly slow down before entering the Strait of Georgia and containment would not be feasible. Cleanup would encompass a long distance of roadside ditch in this situation.

The site was inspected ten days later to verify cleanup. Satpal indicated that they had used a vacuum truck to clean up the large pools of product, and used more straw when necessary to clean up the rest. There were still small amounts of product tied up on the vegetation and two or three very small isolated puddles remaining. Satpal indicated the rest of the material would be removed as rainfall occurred to consolidate the product behind a straw check dam in the roadside ditch.

FINDINGS OF FACT

1. On October 15, 1991 the Treoil Industries LTD. facility located at 4242 Alder Grove Road had a release of the raw product on site, pine oil, and product contaminated stormwater to waters of the state.
2. The facility was not aware of the release until informed of the fact by ARCO personnel. ARCO informed NWRO of the release 6 hours later. NWRO was not informed of the release by the facility because "ARCO reported the spill"

John Glynn
Notice of Violation/Penalty DE No. 91WQ-N257, N259
Treoil Industries, LTD.
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3. Straw was used to control the release in the roadside ditch. Apparent cleanup of the material or straw did not begin until October 18, 1991.
4. The discharge of oil to waters of the state violated RCW 90.48.320.
5. The release was not reported to the U.S. Coast Guard or the Division of Emergency Management in violation of RCW 90.48.360.

DISCUSSION

The intent of the Notice of Violation is to obtain information needed to identify specific actions which are necessary to prevent recurrence as well as notify the facility operators that discharges of this raw product to waters of the state is not allowed.

Discussions with the facility operator about the raw product show a disregard about the possible impacts the product may have on the environment. His assumption that "it's only vegetable oil" and there is no impact have been discussed. Degradation of the raw product could have BOD impacts on other receiving waters which hold fish. To achieve the goal of having him understand that it doesn't have to be petroleum based oil to have impacts on the environment may be a direct result of this Notice of Violation.

The facility operator claims that the product is not miscible in water and given a short amount of time 80 % will separate from being mixed with water. The facility produces a mixture of some of the waste oils from the oil separator and water in an emulsion for dust control purposes. During the inspection on December 10, 1991, a white solid was found on the ground. Satpal stated that it was the emulsion used for dust control. At the time I did not question him on why the mixture was still white if it separated so easily. I believe the oils are miscible in water and could have an impact on aquatic resources of receiving waters.

A chemical analysis of the samples taken by Kirk Smith shows the sample of material taken from the ditch to be chemically identical to the sample taken of the raw product. This sample verifies that the material discharged from the facility was not just wastewater as indicated by the facility operator.

The enforcement guidelines were followed in establishing the penalty amounts. Each penalty amount is the minimum value as recommended by the guidelines.

John Glynn
Notice of Violation/Penalty DE No. 91WQ-N257, N259
Treoil Industries, LTD.
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The violation of RCW 90.48.080 is considered serious because of the limited waterbody the material entered, while the fact that it was an oil product (RCW 90.48.320) that was spilled is considered critical.

This facility has had two spills of this material. Neither spill has been reported to the proper authorities even after it was explained to the facility after the first that it was required by law (RCW 90.48.360) to be reported. This is considered a serious violation.

RECOMMENDATIONS

1. That a Notice of Violation be issued to Treoil Industries, LTD for discharge of pine oil on October 15, 1991, in violation of RCW 90.48.080 and lack of notification in violation of RCW 90.48.360, and that the facility be required to submit the following:
 - a. What has been and will be done to prevent recurrence of spills of pine oil to waters of the state.
2. That a penalty in the amount of \$4,000 be issued to Treoil Industries, LTD.
 - a) For the discharge of pine oils to waters of the state on October 15, 1991 in violation of RCW 90.48.80, the penalty amount of \$1,000.
 - b) For the discharge of oils to waters of the state in violation of 90.48.320, the penalty amount of \$2,000.
 - c) For violation of 90.48.360, failure to notify appropriate agencies, the penalty amount of \$1,000.
3. A followup administrative order may be issued after receipt of the information from the NOV to require Treoil Industries, LTD. to clean out, and maintain clean, the final sump for the discharge of stormwater, boiler blowdown, and non-contact cooling water from the facility to waters of the state.

RN
Attachments

RECOMMENDATION FOR ENFORCEMENT ACTION

Northwest Region: WQ SW/HZ _____
DATE: 12/12/91 _____
FROM: Robert Newman (206) 649-7000
(Full Name of Investigator)

NOV: No. DE 91WQ-N257
ORDER: No. DE _____
PENALTY: No. DE _____
Followup Action: _____
PLP: Yes _____ No _____

RECOMMEND ENFORCEMENT ACTION BE TAKEN AGAINST:

- I. Treoil Industries, LTD.
(Name: Company, Individual, Municipality, County, etc.)
- II. PO Box 2399 Ferndale, WA 98248
(Address) (Zip Code)
- III. ISSUE:
- A. Water Quality Regulatory Notice and Order, RCW 90.48.120
 1) Notice of Violation, RCW 90.48.120(1)
 2) Followup Regulatory Order, RCW 90.48.120(1)
 3) Immediate Action Order, RCW 90.48.120(2).
- B. Notice of Penalty, RCW 90.48.144 (WQ)
- C. Notice of Penalty, RCW 90.48.390 (Oil)
- D. Notice of Penalty, RCW 70.105.080 (HW)
- E. Modification of Water Quality Criteria,
WAC 173-201-100() _____
- F. Agriculture Discharges, RCW 90.48.450
- G. Other _____

FOR VIOLATION OF:

- 1) RCW 90.48.080 Unlawful Discharge of Waste to Public Waters of the State
- 2) RCW 90.48.120 Noncompliance with Regulator Order
- 3) RCW 90.48.160 Wastewater Disposal Permit Requirement
- 4) RCW 90.48.180 Noncompliance with Waste Discharge Permit (include copy of page 1 and permit condition violated)
- 5) RCW 90.48.320 Unlawful Discharge of Oil
- 6) RCW 90.48.360 Failure to Immediately Notify the Department of Oil Discharge
- 7) WAC 173-201 _____ Violation of Water Quality Criteria
- 8) RCW 70.105 Hazardous Waste Laws, specific paragraphs(s)
- 9) Other _____

RECOMMENDATION FOR ENFORCEMENT ACTION:

NOV: No. DE 91WQ-N257

Date: 12/12/91

ORDER: No. DE _____
PENALTY: No. DE _____
Followup Action: _____

Name of Company or Individual Treoil Industries, LTD.

IV. The violation occurred at: Time _____ Date 10/15/91

V. Location of the incident/activity: 4242 Alder Grove Road, Custer, WA

VI. Name of watercourse involved: WRIA 01-0101 Roadside Ditch Class "A"
WBS# _____

VII. Narrative of incident/situation:

(Use separate page or memo if necessary)

On October 15, 1991, Treoil Industries LTD. caused a spill of pine oils to a roadside ditch tributary to WRIA 01-0101.

VIII. Physical evidence obtained: Samples Pictures Other _____

IX. Names and addresses of witnesses:

Kirk Smith NWRO Spill Response

X. Recommended penalty or regulatory action to be taken:

It is recommended that a NOV
be issued to Treoil Industries, LTD
for violation of RCW 90.48.080, 90.48.320, 90.48.360 as authorized
by RCW 90.48.120.

Escalated Penalty: _____ Yes _____ No

Enclosures _____

Lab Report No. _____

Pictures _____

Other _____

Investigated/Requested BY:

Robert Neuman
Robert Neuman

RECOMMENDATION FOR ENFORCEMENT ACTION:

Name of Company or Individual: Treoil In

ENDOR

TO: SECTION SUPERVISOR

FROM: REVIEWER

The following action(s) within the Regi
resolve this problem.

_____ *Concur with* _____

Kevin C. Fitzpatrick

Reviewer

TO: Section Supervisor

FROM: Regional Director

Comments: _____

No comments: _____

Regional Director

RECOMMENDATION FOR ENFORCEMENT ACTION:

NOV: No. DE 91WQ-N257
ORDER: No. DE _____
PENALTY: No. DE _____
Followup Action: _____

Name of Company or Individual: Trecoil Industries LTD.

ENDORSEMENT

TO: SECTION SUPERVISOR

FROM: REVIEWER

The following action(s) within the Region (has) (have) been taken to resolve this problem.

Concur with issuance of NOV.

Kevin A. Fitzpatrick
Reviewer

1-3-92
Date

TO: Section Supervisor

FROM: Regional Director

Comments: _____

No comments: _____

Regional Director

Date

RECOMMENDATION FOR ENFORCEMENT ACTION

NOV: No. DE _____

ORDER: No. DE _____

Northwest Region: WQ SW/HZ _____
HWICP _____

PENALTY: No. DE 91WQ-N259
Followup Action: _____

DATE: 12/12/91

PLP: Yes _____ No _____

FROM: Robert Newman (206) 649-7000
(Full Name of Investigator)

RECOMMEND ENFORCEMENT ACTION BE TAKEN AGAINST:

- I. Treoil Industries LTD
(Name: Company, Individual, Municipality, County, etc.)
- II. PO Box 2399 Ferndale, WA 98248
(Address) (Zip Code)
- III. ISSUE:

- A. Water Quality Regulatory Notice and Order, RCW 90.48.120
 - 1) Notice of Violation, RCW 90.48.120(1)
 - 2) Followup Regulatory Order, RCW 90.48.120(1)
 - 3) Immediate Action Order, RCW 90.48.120(2).
- B. Notice of Penalty, RCW 90.48.144 (WQ)
- C. Notice of Penalty, RCW 90.48.350 (Oil)
- D. Notice of Penalty, RCW 70.105.080 (HW)
- E. Modification of Water Quality Criteria, WAC 173-201-100() _____
- F. Agriculture Discharges, RCW 90.48.450
- G. Other _____

FOR VIOLATION OF:

- 1) RCW 90.48.080 Unlawful Discharge of Waste to Public Waters of the State
- 2) RCW 90.48.120 Noncompliance with Regulator Order
- 3) RCW 90.48.160 Wastewater Disposal Permit Requirement
- 4) RCW 90.48.180 Noncompliance with Waste Discharge Permit (include copy of page 1 and permit condition violated)
- 5) RCW 90.48.320 Unlawful Discharge of Oil
- 6) RCW 90.48.360 Failure to Immediately Notify the Department of Oil Discharge
- 7) WAC 173-201 _____ Violation of Water Quality Criteria
- 8) RCW 70.105 Hazardous Waste Laws, specific paragraphs(s)
- 9) Other _____

RECOMMENDATION FOR ENFORCEMENT ACTION:

NOV: No. DE _____
ORDER: No. DE _____

Date: 12/12/91

PENALTY: No. DE 91WO-N259
Followup Action: _____

Name of Company or Individual Treoil Industries LTD.

IV. The violation occurred at: Time _____ Date 10/15/91

V. Location of the incident/activity: 4242 Alder Grove Road, Custer, WA

VI. Name of watercourse involved: Roadside Ditch Class "A"
WBS# _____

VII. Narrative of incident/situation:
(Use separate page or memo if necessary)
On October 15, 1991, Treoil Industries LTD. caused a spill of pine oils to a roadside ditch tributary to WRIA 01-0101

VIII. Physical evidence obtained: Samples X Pictures X Other _____

IX. Names and addresses of witnesses:
Kirk Smith NWRO Spill Response

X. Recommended penalty or regulatory action to be taken:

It is recommended that a penalty
be issued to Treoil Industries LTD
in the amount of \$4000 for violation of
RCW 90.48.080, 90.48.320, and 90.48.360 as authorized by
RCW 90.48.144.

Escalated Penalty: _____ Yes _____ No

Enclosures _____
Lab Report No. _____
Pictures _____ X _____
Other _____

Investigated/Requested BY:
Robert Newman

RECOMMENDATION FOR ENFORCEMENT ACTION:

NOV: No. DE _____
ORDER: No. DE _____
PENALTY: No. DE 91WO-N259
Followup Action: _____

Name of Company or Individual: Treoil Industries LTD.

ENDORSEMENT

TO: SECTION SUPERVISOR

FROM: REVIEWER

The following action(s) within the Region (has) (have) been taken to resolve this problem.

Concur with issuance of NOP.

Kevin C. Fitzgerald 1-3-92
Reviewer Date

TO: Section Supervisor

FROM: Regional Director

Comments: _____

No comments: _____

Regional Director Date

CHRISTINE O. GREGOIRE
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

October 29, 1991

TO: Bob Newman
FROM: Kirk Smith *KS*
SUBJECT: Treoil oil spill of October 15, 1991

On October 15, 1991 Mr. Bill Kidd of ARCO Cherry Point reported that a spill of pine oil from the Treoil pine oil processing facility had occurred earlier in the day and that much of the oil was contained in the roadside ditch on Aldergrove Road.

On October 16, 1991, I responded to the scene and discovered that approximately 1000 gallons of wastewater from the Treoil facility had been discharged into the roadside ditch just south of the facility. The spill covered an area in the ditch approximately .7 miles along Aldergrove Road and then continuing 100 yds. south down Gulf Road. The material spilled did not appear to be entirely wastewater because large pockets of what appeared to be pure product were observed in the ditch (photos and samples taken).

Upon talking to Mr. Satpal Sidhu, Vice President of Operations, Treoil Industries LTD, he explained that a valve from a wastewater tank was accidentally left open by a facility worker which allowed the wastewater to flow across the facility grounds into two separate settling ponds then into a ditch which led from the ponds to the ditch along Aldergrove Road then west to where Aldergrove Road intersects with Gulf Road and then south along Gulf Road approximately 100 yds. Mr. Sidhu estimated that 300 to 400 gallons of material spilled which conflicts with my estimate of 1000 gallons based on the amount observed. He never did report the spill to WDOE as required by state law.

Mr. Sidhu explained that a cleanup procedure using straw as an adsorbent was effective, however I observed some large pools of free-standing product still in the ditch which did not appear to be adsorbing onto any straw. I told Mr. Sidhu that his cleanup method may not be appropriate and that more efficient measures may have to be taken to improve the progress of the cleanup. He agreed and asked me to please give him a couple of days to make progress. I agreed since the spill was contained.

KS:ks

Resource Conservation and Recovery Act (RCRA)

As a result of its non-hazardous nature the impact of RCRA on the tall oil industry has not been great. This act requires that all hazardous waste be disposed of in approved facilities. The commercial products derived directly from crude tall oil and its fractionated products are generally non-hazardous by the definitions listed in CFR title 40, Section 261, Subpart C & D, therefore their disposal presents no serious problems.

OSHA Hazard Communication Standard Title 29 CFR 1910.1200

The OSHA Hazard Communication Standard, or as it is often called the "Right to Know Law," requires all workers to be made aware of any potentially hazardous materials they might encounter in their work place and to be given appropriate safety training. Two types of hazards are recognized by this law, physical hazards and health hazards. Physical hazards are materials that are flammable, pressurized, unstable, etc.; and health hazards are any material that produces acute or chronic health effects in exposed employees.

Based on surveys of the available physical and health related information all manufacturers of crude tall oil have concluded that their raw material and its fractionation products, i.e., tall oil rosin, tall oil fatty acids, distilled tall oil, pitch, and heads, can all be classified as non-hazardous. Consequently, Material Safety Data Sheets (MSDS) and special labelling are not required by law. Similarly, many of the well known derivatives, such as dimerized fatty acid, dimerized rosin acids, glycerol esters of rosin, and pentaerythritol esters of rosin are also non-hazardous and special labelling is not required.

Even though the law does not require Material Safety Data Sheets, most fractionators and manufacturers of tall oil derived products have published such sheets as a service to their customers. For detailed information on handling these products and any potential hazards associated with them the appropriate MSDS should be studied.

Transportation Regulations Title 49 CFR

Crude tall oil and the products of this fractionation as well as the simple derivatives are considered as non-hazardous materials for transportation purposes. Thus no special labelling of tank cars or tank trucks is required.

Material Safety Data Sheet
 May be used to comply with
 OSHA's Hazard Communication Standard,
 29 CFR 1910.1200 Standard must be
 consulted for specific requirements.

U.S. Department of Labor
 Occupational Safety and Health Administration
 (Non-Mandatory Form)



IDENTITY (As Used on Label and List)

PRODUCT - 3011 (FATTY ACIDS)

Note: Blank spaces are not permitted if any item is not applicable, or no information is available, the space must be marked to indicate that

Section I

Manufacturer's Name TREOIL INDUSTRIES LTD.	Emergency Telephone Number 206 371 0777
Address (Number, Street, City, State, and ZIP Code) P.O. BOX 2399	Telephone Number for Information 206 371 0777
FERNDAL, WASHINGTON 98248	Date Prepared MARCH 1990

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (optional)
FATTY ACIDS.				

Section III — Physical/Chemical Characteristics

Boiling Point	> 350° C	Specific Gravity (H ₂ O = 1)	0.91
Vapor Pressure (mm Hg) @ 20° C	< 1mm Hg	Freezing Point	CONGEALS BELOW 10° C
Vapor Density (AIR = 1) @ 20° C	negligible	Evaporation Rate (Butyl Acetate = 1)	< 1
Solubility in Water	SLIGHT		
Appearance and Odor	YELLOW-AMBER, SLIGHTLY VISCOUS LIQUID, FATTY ODOR		

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used) > 140° C	Flammable Limits N/A	LEL	UEL
Extinguishing Media WATER SPRAY, DRY CHEMICAL, FOAM, CARBON DIOXIDE, HALON	Special Fire Fighting Procedures USE SELF CONTAINED BREATHING EQUIPMENT, COOL CONTAINERS WITH WATER IF EXPOSED TO FIRE		
Unusual Fire and Explosion Hazards NONE			

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	
Incompatibility (Materials to Avoid)			NONE
Hazardous Decomposition or Byproducts			NONE

SPONTANEOUS HEATING MAY OCCUR IN SUCH ITEMS AS RAGS, INSULATION AND TRASH SOAKED WITH THIS MATERIAL.

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

Section VI — Health Hazard Data

PRIMARY ROUTES OF ENTRY: EYES, SKIN.

Health Hazards (Acute and Chronic)

Carcinogenicity NTP? NONE IARC Monographs? NONE OSHA Regulated? NO

Signs and Symptoms of Exposure MILD IRRITATION OF SKIN, EYES.

Medical Conditions Generally Aggravated by Exposure TREGIL IS NOT AWARE OF ANY ALLERGIC SKIN REACTIONS CAUSED

BY THIS PRODUCT.

Emergency and First Aid Procedures EYES: FLUSH WITH PLENTY OF WATER, IF SWALLOWED, DO NOT INDUCE VOMITING, CALL A PHYSICIAN.

Section VII — Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled

SCRAPE UP AND SALVAGE IN METAL CONTAINERS, SOAK UP SMALL SPILLS WITH DIRT AND SAND. WASH AREA WITH DETERGENT AND WATER.

Waste Disposal Method

INCINERATION OF COMBUSTIBLE WASTES IN PERMITTED FACILITIES IS THE PREFERRED DISPOSAL METHOD.

Precautions to Be Taken in Handling and Storing

THIS PRODUCT IS NOT LISTED IN FEDERAL HAZ. WASTE REG. 40 CFR 261. IT DOES NOT EXHIBIT ANY OF THE HAZARDOUS CHARACTERISTICS LISTED IN 40 CFR 261 SECTION C. STATE OR LOCAL HAZ. WASTE REGULATION MAY APPLY IF DIFFERENT FROM FEDERAL REGULATION.

Section VIII — Control Measures

Respiratory Protection (Specify Type)

NONE

Ventilation	Local Exhaust	NONE	Special	NONE
	Mechanical (General)	NONE	Other	

Protective Gloves RECOMMENDED Eye Protection SAFETY GLASSES

Other Protective Clothing or Equipment RECOMMENDED

Work Hygiene Practices

AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH HANDS WITH SOAP & WATER BEFORE EATING, DRINKING.

COORDINATOR: DOROTHY GLENN UNIQUE RECORD #: N6501 REGION: N

DATE/TIME REC'D: 10/15/91 16:45:54 REPORT TYPE: INITIAL

REPORTER'S NAME: BILL KIDD BUSINESS NAME:
 4519 GRANDVIEW ROAD CHERRY POINT ARCO
 ADDRESS: BLAINE WA BEST TIME
 OR ANONYMOUS: TO CALL:

WORK PHONE: (206)-371-1437 EXT. HOME PHONE:

DETAILS ON INCIDENT:

COUNTY: WHATCOM NEAREST CITY: BLAINE
 WATERWAY: N/A WRIA #:
 LOCATION: IN THE DITCH THAT RUNS ALONG THE SOUTHERN BOUNDARY OF THE ARCO
 PLANT

WEATHER: CLEAR TIDE:

DETAILS ON ALLEGED VIOLATOR:

NAME & ADDRESS:

TREOIL
 UNKNOWN 4242 *aldergrove Rd.*
 NEXT TO ARCO *Custer, WA*

CONTACT'S NAME:
 PHONE NUMBER AND EXT:
 (206)-371-0777

VEHICLE INFORMATION: OR 206/371-0777

DESCRIPTION OF CONTAMINANT: (PROVIDED BY REPORTER)

MEDIUM: SURFACE WATER OTHER: PINE OIL
 MATERIAL: OTHER
 QUANTITY: 10 55 GAL DRUMS
 SOURCE: COMMERCIAL

COMMENTS: ARCO NOTICE THE OIL AND WHEN CHECKING FOUND IT WAS NOT FROM THEM
 BUT WAS THE PINE OIL FROM THE BUSINESS NEXT TO THEM. THEY
 NOTIFIED THE OWNER AND THEY NOW HAVE IT CONTAINED TO A 200 YARD
 AREA OF THE DITCH.

REFERRED TO PROGRAM: SPILLS SECTION HEAD: O'BRIEN

EXTERNAL REFERRAL? (Y/N): N

IF EXTERNAL, WHAT AGENCY: _____

INVESTIGATION COMPLETED? (Y/N): N
 IF YES, COMPLETE SECOND PAGE OF FORM.

PHOTO No. 1

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS: _____

FILM: _____

CAMERA: _____

DESCRIPTION:

View West on

Alder Grove Road

Ditch to right contains product

COMMENTS: _____

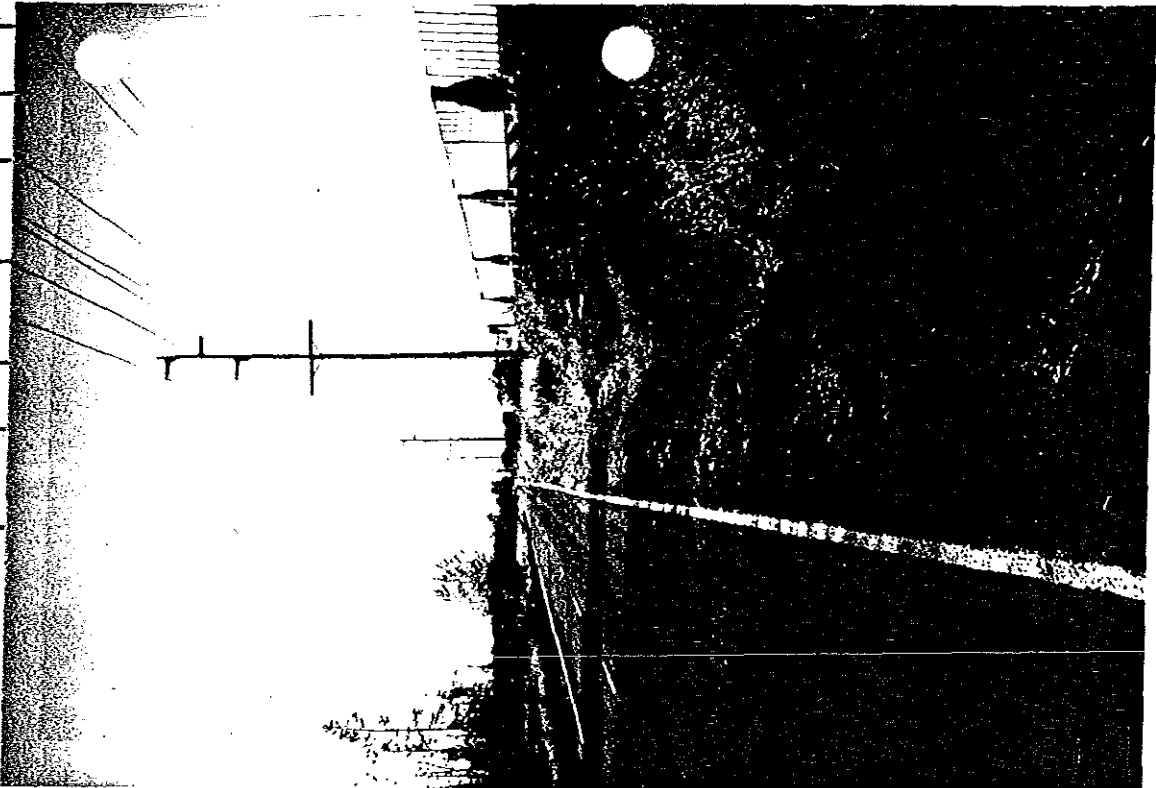


PHOTO No. 2

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS: _____

FILM: _____

CAMERA: _____

DESCRIPTION:

View East along

Alder Grove Road

Facility is to left of 4th and 5th power poles.

COMMENTS: Channeled water travels on the left of train tracks and enters ditch between 1st and 2nd power poles.



PHOTO No. 3

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS:

FILM: _____

CAMERA:

DESCRIPTION:
Holding/separator
Tanks prior to
discharge

COMMENTS: Large tank is separator smaller tanks to right are filters
water normally flows under grating in front to small pond

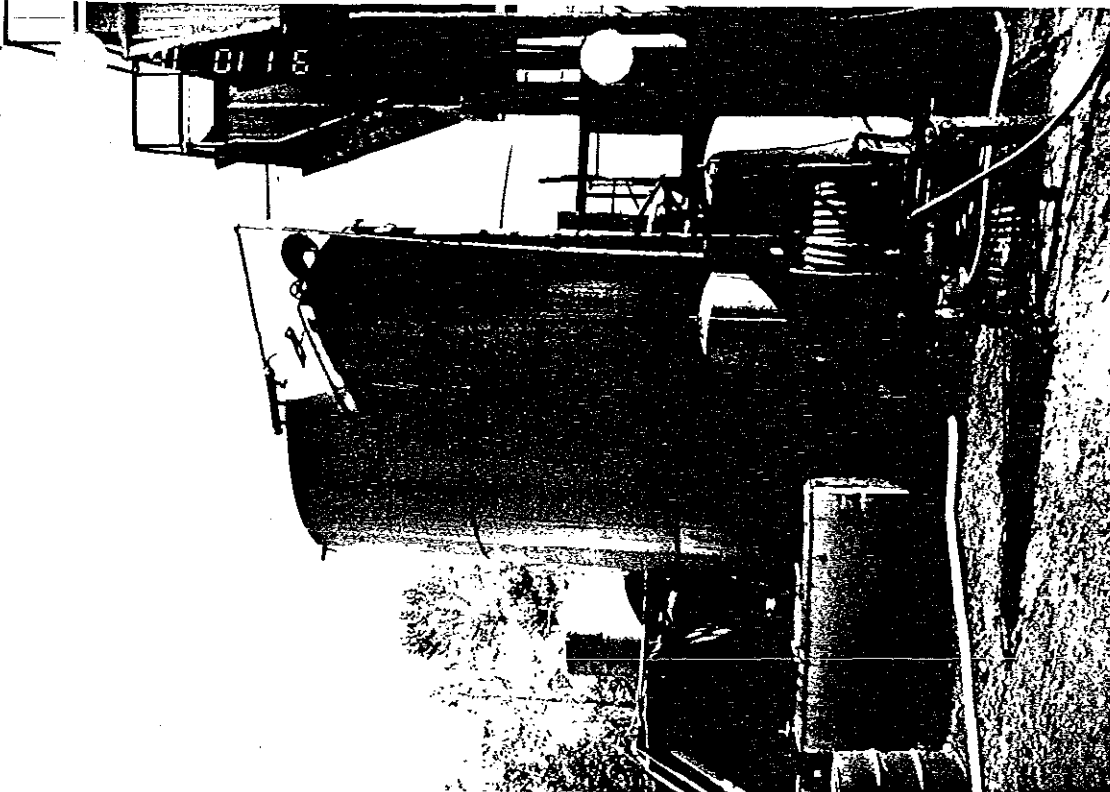


PHOTO No. 4

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS:

FILM: _____

CAMERA:

DESCRIPTION:
"Final" sump for
discharge water

COMMENTS: Every visit to this facility has shown oils to be in this "Final"
sump. Wood crate in back of pond is to recover product on water surface

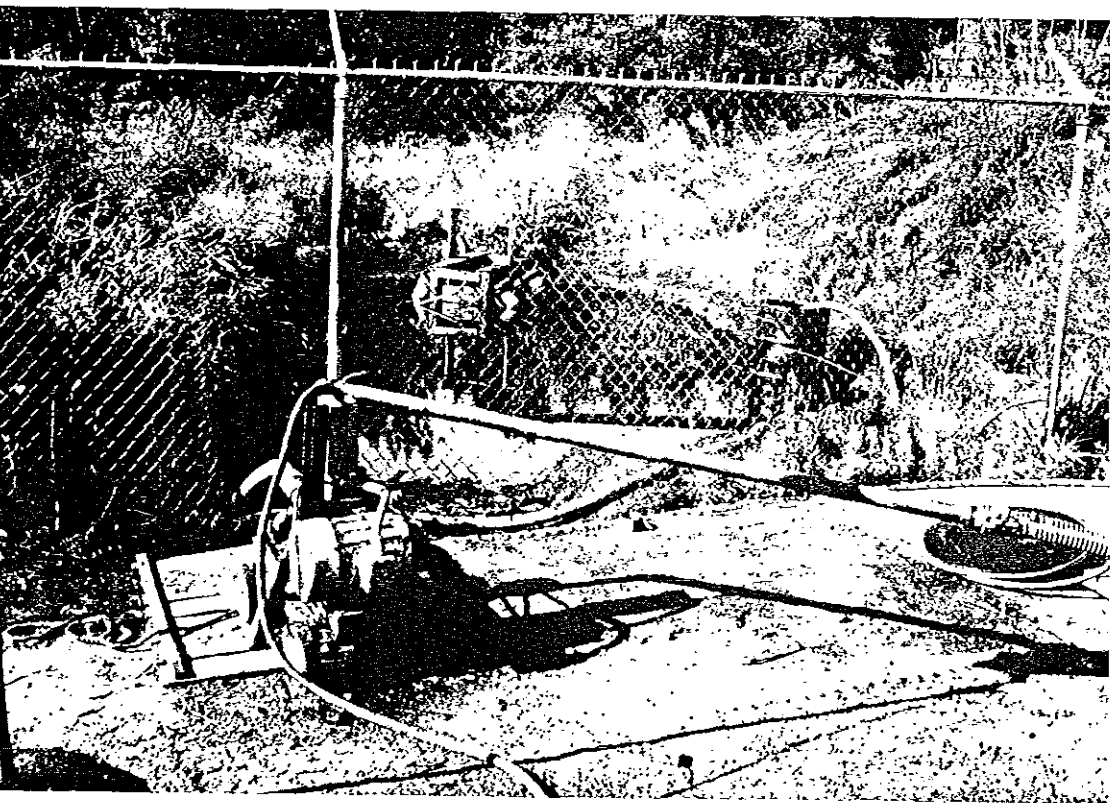


PHOTO No. 5

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS:

FILM: _____

CAMERA:

DESCRIPTION:

Large pool area

Next to ARCO

SE entrance

COMMENTS: Dark liquid is pine oils



PHOTO No. 6

DATE: 10/16/91

TIME: _____

TAKEN BY:
K. Smith

WITNESS:

FILM: _____

CAMERA:

DESCRIPTION:

Typical method of

using straw as

"containment"

COMMENTS: _____



PHOTO No. 7

DATE: 10/18/91

TIME: _____

TAKEN BY:
R. Newman

WITNESS: _____

FILM: _____

CAMERA: _____

DESCRIPTION:

Same location as
Picture 5 showing

no clean up taken place 2 days after spill

COMMENTS:



PHOTO No. 8

DATE: 10/18/91

TIME: _____

TAKEN BY:
R. Newman

WITNESS: _____

FILM: _____

CAMERA: _____

DESCRIPTION:

The only workers
I've had cleaning
the ditch on 10/18



COMMENTS:

TREOIL INDUSTRIES, LTD
DE91-MQNZ59 SWL 85

Written off

7/5/95



