ATI QUEEN AVENUE

2/19/2014 Dan Heister asked me to meet him Albany, Oregon at 8:30 am to accompany him on ATI Queen Avenue site visit.

Thursday 2/20/2014

2/20/2014 Rainy, ~45-degrees F. Jim Petersen-E&E/START met with Dan Heister-USEPA at 08:30. We discussed the ATI Queen Avenue site. We went to site at 09:00. We checked in the security guard. Cascade Metals Recycling is on site dismantling pipes and tanks. NRC is on site with crew of two: Mike Cunningham and Antonio Villanueva. NRC is on site to ensure any residual material that may be encountered in pipe is safely contained.

Heister and Petersen spoke with four Cascade employees [redacted] that he was concerned that they could be potentially be exposed to hazardous liquids inside the pipes, and that he had expressed his concerns to Jonathan Sheckard of River City, and to the NRC employees. [redacted] explained away any risk, saying all the piping had been rinsed out. [redacted] stated that the co-owner Faruk Alhadi asked him how long they'd be dismantling the pipes, [redacted] told him possible a couple of weeks, to which Faruk said that was completely unacceptable. [redacted] directed him to contact his boss or River City.

[redacted] said that one Cascade employee had gotten burned from a substance that leaked out of a pipe located in the ATI-Queen Avenue tank farm. We asked if he could meet the employee, and [redacted] introduced us to [redacted] ___ of Cascade. [redacted] showed us an approximately 3" scabbed, crescent-shaped wound on his scalp. Ron said that he had got the liquid on his head on Tuesday 2/18/2014. [redacted] had not been to the doctor at this point. [redacted] emailed a photo he'd taken of the wound on the evening of 2/18 to Dan Heister.

[redacted] stated that on the afternoon of 2/18/2014 while working on an elevated platform in the tank farm scrapping process piping (apparently the acrylonitrile piping) he [redacted] smelled a "chemical smell," then became nauseated and vomited. He said that after he smelled the odor and he got a funny taste in his mouth just before vomiting. NIOSH handbook states that nausea and vomiting are symptoms of acrylonitrile exposure.

Dan Heister and I next talked to Mike Cunningham of NRC. Mike said that he thought some of the pipes, though drained, may still have residual product, including acids and hydroxides. He thought that the acrylonitrile lines, though, had been rinsed of residue. Dan asked why some of the lines may not have been rinsed of residue, and Mike answered that NRC had been told not to. Mike said that he had been approached by the co-owner Dave Ellis earlier in the week and was sternly question by Ellis about what value he and NRC were bringing to the scrapping operation. Faruk Alhadid expressed similar comments to Ron of Cascade Metals instating that they speed up the work because he was not pleased about paying to have NRC on site.

Mike said the Cascade employee who'd received the burn [redacted] likely touched his head (apparently with chemical-contaminated gloves). Mike said none of the Cascade workers were HazMat trained, and that NRC tried to explain the hazards, but the workers still did not always use safe practices. The Cascade crew had no Hazwoper training, yet for the first three days of work (Monday 2/17, Tuesday 2/18, Wednesday 2/19) NRC provided them with personal protective equipment (PPE: Tyvek/Saranex, gloves, face shields) and told the Cascade crew to avoid getting any material on them because it was "hot product".

Mike said that the Cascade employee who had gotten sick [redacted] had eaten a ½ a greasy chicken for lunch, a short while before the incident, and that was likely what caused the illness. Mike said that he had been standing beside [redacted] at the time of the incident, and that he hadn't smelled any unusual odor and that he had a Photoionization Detector (PID) and had not detected any acrylonitrile. [NOTE: A standard 10.6 eV PID lamp will NOT pick up acrylonitrile, you need an FID, or a PID equipped with an 11.7 eV lamp which is not common].

Dan talked to Mike Cunningham later in the day (around 11:00 am) and Mike changed his story such that he doesn't know if NRC rinsed all of the pipes or not. He said he was mostly involved with the Ferry St. property.

Jonathan Sheckard of River City called Dan Heister shortly after 11:00 wanting to know what was going on at the site. Dan asked Jonathan if the pipes at the ATI Queen site had all been cleaned and flushed per the approved workplan submitted by NRC. Jonathan said that he thought that they were, that he had been told by NRC that they had.

Jonathan called Dan again and said that he had contacted NRC management, and that they had confirmed to him that yes, all of the pipes had been drained of product and rinsed with water.

Dan Heister and Jim Petersen walked around the site, took photographs of the work at the facility.

At approximately 2:00 pm on 2/20/2014 Dan received a call from [redacted] of Cascade. They had taken [redacted] to the occupational clinic, and said the clinic had diagnosed it as a chemical burn, and appeared to be healing. However, they said if it was from potassium hydroxide there is an ongoing concern because it could result in the wound opening and closing, and possible continued tissue damage. They scheduled another appointment for [redacted] next week to examine the injury.

Dan Heister and Jim Petersen depart site at 16:00.

FRIDAY 2/21/2014

07:30 45-deg. F, cloudy. Jim Petersen on site at ATI Queen Avenue facility. Checked in with security person and signed sign-in log at from desk. Met the Cascade Metal Recycler crew. Same 4 as yesterday: [redacted] plus a higher level person, [redacted], from their Grants Pass office.

Bryan Ciecko of E&E/START is on the way down with the PERT to assist in sampling effort. Sampling will include the blue plastic container where NRC and Cascade Metal Recycling placed liquids that they had encountered in pipes, and collected in buckets.

08:10 Dan Heister and Jim Petersen talked with the five Cascade Metal Recycle employees named above. Cascade started working on the ATI Queen Ave tank farm demo on 2/17/14. They had been told by Mike Cunningham of NRC that the pipes had been "drained" but not flushed. Cascade confirmed that the pipes that they have cut open on the site had liquid in them. The material would be collected in a bucket by an NRC or Cascade worker. Some would spill to the ground (or floor, or tank farm containment). The buckets were poured into a blue plastic container, approx. 42 gallon capacity, which is now located in the southeastern corner of Building #1. [redacted] got a liquid on him one day, and was told by Mike Cunningham to go rinse it off immediately with water. [redacted] said that on one occasion he cut open a pipe with a grinder and a liquid came out onto the floor, and Antonio Villanueva of NRC sprayed a neutralizer on it.

[redacted] said he was working in the warehouse (Bldg #1) on Tuesday 2/18/14 and opened a valve, and that is when the liquid got on his head (not clear if it was splashed or if he had it on glove and rubbed his head, or what). [redacted] (Cascade Foreman) has a log entry stating that [redacted] was working on a starch line when it "blew" and sprayed his head and shoulder area.

NRC directed Cascade to open valves, cut pipes at the low points, and then if liquid came out to capture it, as best they could, in buckets. They were instructed not to get material on them and if they did to immediately decon with water. The crew described the bucket capturing technique as a fire drill and chaotic with as much material reaching the ground as being captured in the bucket. NRC supplied Cascade employees with Tyvek suits and nitrile gloves and face shields, which they told them to wear up until the end of Wednesday (2/19/2014).

[redacted] stated that the acrylonitrile piping often occurred as an approximately 5-inch outer pipe with a 2-inch inner pipe (double walled configuration). Always when they cut into this a brown liquid would come out, but he is not sure if it came from the interstitial space between the pipes, or from the 2-inch pipe. He described it as looking like rusty water.

Cascade workers said NRC workers (Mike or Antonio) would often check liquid in pipes with pH test strips. Several times this week Mike identified liquid as "hot" which indicated that the material was dangerous and needed to be contained. Typically they would be told to go work somewhere else for a while, while the NRC workers collected the liquid in buckets. When the pipes were cut up, they were not rinsed or cleaned, but put into the open metal recycling bins.

[redacted] said that Cascade had bid the job assuming they could cut the pipes up with torches, and had no knowledge of the dangerous materials inside the pipes.

[redacted] stated that Faruk Alhadid, came on site about 2 weeks ago (prior to today, 2/21) and asked how long it would take to demo the process piping. Ron said 7 to 10 days, and Faruk became angry and said

that was too long, they needed to do it in 3 days, because it was costing him too much money to have NRC on site to stand around and watch them.

[redacted] said that Mike Cunningham on Tuesday 2/18/14 opened a bottom valve on a catchment tank, located in the small secondary containment east of the water treatment building. The valve to the containment was open, allowing the contents of tank to flow into the wastewater chaseway (presumably to san. sewer, but I am not sure about this-JP). Mike then said he didn't feel good about it, and closed the tank valve. Then, a few minutes later, Mike opened the valve again allowing the tank contents to drain out. [redacted] all witnessed this and said that material flowed continuously from the tank for approximately 30 minutes.

12:10 Jim Petersen and Bryan Ciecko collected a sample from the blue plastic drum in SE corner of Building #1 in which NRC has stored liquid collected from pipes. We tested the liquid with pH test strips which indicated pH of about 13. Samples submitted to ALS lab for pH, VOC, and total metals.

Dan and Jim used pH test strips to measure a bin of water on the floor in the SW corner of Bldg #1. Test strip indicated pH less than 3. We also checked a small puddle on the floor, and read a pH of 3 to 4. This sample was taken directly under a grated scaffolding above which had cut up chemical line laying on the grate floor directly above the sampled puddle.