U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Fairfax St Wood Treater - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #4**
Progress POLREP
Fairfax St Wood Treater
B4B5
Jacksonville, FL
Latitude: 30.3539904 Longitude: -81.6871852

To:
From: Rick Jardine, FOSC
Date: 12/22/2010
Reporting Period: 11/20/2010 to 12/22/2010

1. Introduction

1.1 Background

Site Number:	B4B5	**Contract Number:**	EP-S4-07-03
D.O. Number:	77	**Action Memo Date:**	10/28/2010
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/10/2010	**Start Date:**	8/11/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:	FLD000623041	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category - Emergency Response

1.1.2 Site Description - abandoned chromated copper arsenate wood treatment facility located within a residential neighborhood.

1.1.2.1 Location - 2610 Fairfax Street, Jacksonville, FL

1.1.2.2 Description of Threat - potential for heavy metals to be released via approximately 1000 feet of storm water system to Moncrief Creek.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results - State-lead study indicates surface soil contamination throughout the site and beyond the fence line into the community.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative - (See previous POLREPS for detailed operational information)
This emergency removal action continues as EPA evaluates whether further removal action is appropriate. Simultaneously, the facility assets are being claimed separately by entities under negotiation with the secured creditor.

2.1.2 Response Actions to Date - During this reporting period, EPA has implemented a strategy to minimize storm water flow through the tank farm containment. The tactics include rewashing the drip pad, installing a concrete curb, and installing a relief trough from the pad to the site lay down area. The curb was installed to block off flow from the pad to the pressure vessel containment sump. The relief trough allows runoff to exit the drip pad towards the west. Without the trough, storm water would accumulate on the drip pad and potentially overtop the curbing. Rinse samples collected from the cleaned drip pad indicate water concentrations of the metals to be less than one part per million for each constituent.

Beginning December 13th, EPA flowed several test runs of treated water to the sanitary sewer system to determine whether the metals-contaminated water would cause a system upset. This was a necessary test as the third party respirometer analyses were inconclusive. On the 22nd, JEA granted a conditional permit to discharge treated site water to the POTW. Initially the weekly allowable volume will be 20,000 gallons released in maximum 10,000 gallons events. Other conditions include discreet testing and communications regarding each batch of treated water.

EPA delivered prospective process water (batch water from tanks #1and #2 as well as effluent collected from the containment structure) to the Savannah Wood Preserving Company. Savannah Wood has approved the waters for receiving. With some process alteration, Savannah Wood has indicated it can bring the waters up to specification that meets the quality required for beneficial use. EPA inquiry to GA EPD

indicates that Savannah Wood maintains environmental compliance.

EPA continues to process contaminated storm water. The process, which is an adapted absorption polishing to remove metals, requires several passes through the titanium dioxide media to remove the concentrations that we have on site. The arsenic and copper tend to have a high afinity for the reaction and are removed quickly, however the chromium requires repeated processing to meet the JEA discharge requirement. As of this report, one frac tank has been successfully treated and discharged. Two others are believed to be ready, pending chemical analyses. Two more have been processed multiple times and are close to the final polish. The final polish requires a fresh media loading into the treatment process vessel.

Several set backs have occurred over this reporting period. Abnormally low temperatures have caused water to freeze making treatment start-up difficult each morning. WRS has had to drain and winterize the flow lines each night to minimize the delays. Also several sight glasses have broken on the vertical facility tanks. In one case the tank released much of it's contents to the containment structure. WRS sealed the sight glass valve and pumped the material back into the tank. Several tanks have begun to weep leakage to the containment. Additionally one brittle PVC line connecting a submersible pump to a holding tank failed releasing its contents to the containment structure. WRS replaced that line with new piping and pumped the material back into its tank.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs) - Regional Superfund Enforcement personnel are engaged in this project.

2.1.4 Progress Metrics

TABLE 1 - Media and Wastes Collected

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal/ Discharge***
captured lagoon water	**water**	**40,000 gals**		**Absorption**	**20,000 to JEA**
contaminated facility storm water	**water**	**250,000 gals**		**Absorption**	
process batch water	**water**	**100,000 gals**		**beneficial use off-site**	
CCA sludge	**solid**	**14 drums**			

TABLE 2 - Batch Summary (the status of the waste stream is ongoing, the tank disposition is a snapshot in time)

Batch	**Source**	**Current Storage Unit**	**Status**
Alpha	Pond Water	F-13	3rd Treatment, awaiting analytical results
Beta	Pond Water	None	Discharged from Dec 13th throough 21st
Gamma	Tank Sump	F-3	Petroleum contaminated
Delta	Tank Sump	F-4	Untreated - likely to Savannah Wood
Epsilon	Tank Containment	F-2	Treated once, combined w/ former w/s Iota which was only half full
Zeta	Tank Sump	F-6	Untreated - likely to Savannah Wood
Eta	Tank Containment	F-10 to F-1	1st Treatment pass underway
Theta	Tank Containment	F-14	Treated once, combined w/ former w/s Iota which was only half full
Iota	Tank Containment		Combined into Theta and Epsilon
Kappa	Tank Containment	F-5	twice treated (As, Cu good, Cr at 300 ppm)
Lambda	Tank Containment	F-7	twice treated, awaiting analysis
Mu	Tank Containment	F-12	Untreated - likely to Savannah Wood
Nu	Tank Containment	F-11	several treatment passes, awaiting analytical

2.2 Planning Section

2.2.1 Anticipated Activities - Site activity is being discontinued over the Christmas Holiday. ERRS is keeping a skeleton crew available on a nearby site to handle any emergency issues that may develop. The team lead by Marc Syracuse is scheduled to return on Wednesday December 29th and continue through the New Year Holiday.

2.2.1.1 Planned Response Activities -

1. Collect contaminated water, including rainwater that falls in contaminated areas, to prevent offsite release;
2. Treat collected water to meet industrial standards mandated by the municipal waste water treatment authority;
3. Discharge treated water to sanitary sewer system;
4. Ship process waters and high concentrate effluent to Savannah Wood;
5. Decontaminate rental storage tanks and return.

2.2.1.2 Next Steps -

2.2.2 Issues

The treatment media is very costly. EPA Research and Development personnel who have been working with TiO2 aresenic treatment are considering becoming engaged in this project to assist in developing a process for regeneration of the media. The development of such science could have widespread utilization across EPA Programs. EPA R&D may conduct a site visit early January.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

FDEP RCRA, Superfund, and Emergency Response Divisions have been actively participating in the response. JEA has lent expertise and established waste water criteria for allowable discharge to theier treatment works.

4. Personnel On Site

Currently WRS has a 3 man crew that is supplemented during surge requirements. WRS has subcontracted security to a local security firm.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.