

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
CUC Rota Power Plant - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IX

**Subject:** POLREP #1  
Initial  
CUC Rota Power Plant  
  
Songsong, MP  
Latitude: 14.1366670 Longitude: 145.1358330

**To:**  
**From:** Michelle Rogow, OSC  
**Date:** 8/3/2011  
**Reporting Period:** 8/1/11-8/4/11

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	Z9D9 / 09WV	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA/OPA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/31/2011	<b>Start Date:</b>	8/1/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>	E11903	<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

#### 1.1.2 Site Description

The Rota Power Plant site is located in Songsong Village on the island of Rota in the Commonwealth of the Northern Mariana Islands (CNMI). The power plant sits approximately 100 feet from the shoreline of the Philippine Sea. Operations at the site include the generation of power for the island of Rota, storage of new and used oil, and oil/water separation. The Rota Power Plant site contains four primary aboveground storage tanks (ASTs) as well as day tanks and drum and transformer storage areas.

There are two oil/water separator (OWS) systems located at the Rota Power Plant site. One rudimentary OWS consists of drums from which oil is manually skimmed. The system is located inside the main Power Plant building and drains to the north of the building into a pit. A second in-ground OWS is piped from the secondary containment areas of the ASTs and the drum storage berm located in the western portion of the property. This OWS can hold 2,500 gallons of oil and water and discharges separated water directly to a pit dug in the ground.

In addition, there are several current and former transformer storage areas where PCB-laden transformer oil may have leaked onto the soil.

##### 1.1.2.1 Location

Songsong Village, Rota, CNMI

##### 1.1.2.2 Description of Threat

Release of PCBs and petroleum products to soil and groundwater.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

Beginning assessment of PCBs and diesel in soil and groundwater.

**2.1.2 Response Actions to Date**

8/1/11: Personnel on site: EPA – 2, DEQ – 2, CUC – 2, START – 1, ERRS – 3. Mobilization to site, Geoprobe rig and other equipment unloaded from shipping containers. Commenced direct-push Geoprobe borings to identify location for first monitoring well.

8/2/11: Personnel on site: EPA – 3, DEQ – 2, CUC – 2, START – 1, ERRS – 3. First monitoring well (MW-1) installed. Multiple Geoprobe borings in several locations on site indicate presence of diesel in dissolved phase in groundwater in concentrations high enough to smell strongly. Grid laid out for surface soil sampling in and around current and former transformer storage areas.

8/3/11: Personnel on site: EPA – 3, DEQ – 2, CUC – 1, START – 1, ERRS – 3. Second monitoring well (MW-2) installed. Continued soil borings to plan placement of monitoring wells and assess extent of diesel contamination of groundwater. Continued to find high concentrations of dissolved-phase diesel in groundwater. Collected surface soil samples for PCBs and total petroleum hydrocarbons on established grid. Prepared soil samples for shipment. ERT dug several 1-2 foot deep holes, approximately 10 feet from the ocean, on beach down gradient of site. Groundwater in 3 holes showed a spotty sheen within 5 minutes, indicating that it is almost certain that diesel is being released to the ocean.

8/4/11: Personnel on site: EPA – 3, DEQ – 2, CUC – 1, START – 1, ERRS – 3. MW-1 development complete. Soil samples shipped to mainland for analysis. Continued soil borings to plan placement of monitoring wells and assess extent of diesel contamination of groundwater. Continued to find high concentrations of dissolved-phase diesel in groundwater.

8/5/11: Personnel on site: EPA – 3, DEQ – 2, CUC – 1, START – 1, ERRS – 3. MW-2 development complete. MW-3 drilled. Observed discharge from rudimentary oil/water separator into pit dug on site. Water in all stages of separator showed sheen, and oil staining was visible on walls of separator basin. Surface of water in discharge pit showed a sheen. Sample taken of water in pit.

8/6/11: Personnel on site: EPA – 3, DEQ – 2, START – 1, ERRS – 3. MW-3 developed. Drilled and completed MW-4 and MW-5. Again observed discharge from rudimentary oil/water separator into pit dug on site. Surface of water in discharge pit showed a sheen. Sample taken of discharge from oil/water separator. Soil sampling continued.

8/7/11: Personnel on site: EPA – 3, DEQ – 2, START – 1, ERRS – 3. MW-4 and MW-5 developed. Soil sampling continued. Heavy rains happered site activities.

8/8/11: Personnel on site: EPA – 3, DEQ – 2, START – 1, ERRS – 3. Groundwater monitoring well sampling begun. Samples were collected and packaged. ERRS completed monitoring wells and consolidated development water into drums. Drums were sampled and placed in secondary containment area. Drill rig was decontaminated and packed for off island shipment.

8/9/11: Personnel on site: EPA – 3, DEQ – 3, START – 1. Groundwater monitoring well sampling was completed. Samples were shipped off site. ERRS demobed. Additional CNMI DEQ mobed to assist with groundwater sampling

8/10/11: Personnel on site: EPA – 2, DEQ – 2, START – 1. Remaining groundwater samples were shipped off. Supplies were shipped off or stored. Equipment was packed and shipped. Site was buttoned up.

8/11/11: Personnel on site: EPA – 3, DEQ – 2, START – 1, ERRS – 3. Remainig site personnel demobilitized.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The CNMI Commonwealth Utilities Corporation (CUC) is under a Department of Justice and EPA order to address contamination and other issues at the Rota power plant. CUC requested that EPA undertake the assessment and clean-up of soil and groundwater contamination at the site.

**2.1.4 Progress Metrics**

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

**2.2.1.1 Planned Response Activities**

#### **2.2.1.2 Next Steps**

Assess data from sampling event, plan and implement remedy.

#### **2.2.2 Issues**

This site is extremely remote and located on an island with virtually no services or supplies available. This presents significant logistical challenges.

#### **2.3 Logistics Section**

Drill rig being used for installation of soil borings and monitoring wells had to be shipped from the US mainland, due to the unavailability of these resources on the island. All future deployments will likely require shipping of equipment and supplies.

#### **2.4 Finance Section**

No information available at this time.

#### **2.5 Other Command Staff**

No information available at this time.

### **3. Participating Entities**

#### **3.1 Unified Command**

#### **3.2 Cooperating Agencies**

CNMI Division of Environmental Quality

### **4. Personnel On Site**

USEPA - 3  
START - 1  
ERRS - 3  
CNMI DEQ - 4

### **5. Definition of Terms**

No information available at this time.

### **6. Additional sources of information**

No information available at this time.

### **7. Situational Reference Materials**

No information available at this time.