

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Puma Energy Caribe (CAPECO) CERCLA Oversight Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #2
Puma Energy Caribe (CAPECO) CERCLA Oversight Site
A243
Bayamon, PR
Latitude: 18.4179488 Longitude: -66.1712716

To:
From: Christopher Jimenez, Mark Gallo, OSC
Date: 3/19/2012
Reporting Period: 08/03/2011 - 03/19/2012

1. Introduction

1.1 Background

Site Number:	A243	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/11/2011	Start Date:	5/11/2011
Demob Date:		Completion Date:	
CERCLIS ID:	PRD00063218	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

PRP Oversight Removal Action

1.1.2 Site Description

The site is a former oil storage facility and out of service refinery formerly operated by CAPECO,

On 10/23/2009 a gasoline tank was overfilled and gasoline vapors reached an ignition source and exploded. The force of the explosion damaged and ignited numerous nearby storage tanks filled with petroleum products such as Diesel fuel, and gasoline. Millions of gallons of product were ignited and an unknown quantity of product was released overland and into an adjacent wetlands.

That same day EPA Region II mobilized OSCs and contractor personnel to the scene to assist in the remediation effort. An Oil Pollution Act 1990 (OPA '90) Spill fund account was established by the US Coast Guard's National Pollution Funds Center, and EPA has had contractors on-Site since then to provide oversight, to assist the facility in remediating the releases, and to eliminate the threat of additional releases to navigable waterways of the US.

During the course of working on the Site EPA discovered the presence of approx. 100 small, deteriorated unmarked, compressed gas cylinders lying on the ground behind an out building at a remote location on the Site, and an accumulation of 500-lb compressed gas cylinders close by. The larger cylinders were deteriorated and some were labeled as "poison".

Elsewhere on the Site a chemical odor was detected from a building where dozens of drums were stored. Upon closer examination it was observed that the drums appeared to contain virgin chemicals but they looked to be many years old. It was also observed that at least one drum had turned over and was lying on the ground; the bung was open and a puddle of liquid was on the ground around the drum.

Some of these wastes were removed during the CAPECO CERCLA fund lead removal Action. On May11, 2011 Puma took over the removal action under an Administrative Order on Consent with EPA. Puma will continue the removal of the hazardous substances including F and K wastes in the WWTP and the asbestos that can be found throughout the refinery area.

A large amount of Asbestos Containing Materials (ACM) has also been discovered on site, in the abandoned refinery area and on piping within the Site tank farm.

1.1.2.1 Location

The Site is located in Bayamon Puerto Rico in the Luchetti Industrial Park. It is bordered by numerous businesses, The Fort Buchanan Military Base, and residential neighborhoods.

1.1.2.2 Description of Threat

If this action is not taken the surrounding businesses, and communities could be adversely affected by air borne asbestos from the refinery or from hazardous waste that is currently stored on-site and contained in the facilities WWTP that discharges to Las Lajas and Malaris Creeks

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

This action is a continuation of a fund lead removal action at Caribbean Oil Refining Site. Puma Energy has entered into an AOC with EPA to complete the removal action under EPA oversight.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

See Background Section

2.1.2 Response Actions to Date

On August 12, 2010, CAPECO filed for Bankruptcy and on December 16 and 17, 2010 an auction was held for the CAPECO assets with Puma Energy International being the successful bidder. From the point of late December 2010 through the initial week of May 2011, EPA and DOJ worked with Puma Energy (Puma) to establish a CERCLA Consent Order in which Puma would work to address any existing releases of hazardous substances remaining from the incident of October 23, 2009. By April 21, 2011, the CERCLA Consent Order was signed by both parties (EPA and Puma) and Puma proceeded to close on the CAPECO assets on May 11, 2011.

From May 11, 2011, EPA began transition activities, moving from a fund lead removal to a Responsible Party (RP) oversight removal action.

EPA has been conducting oversight on CERCLA related activities on-site since Puma took over the Site on May 5, 2011

For information related fund lead activities see polreps #40 and before from the Caribbean Petroleum Corporation CERCLA Site.

During this reporting period, Puma engaged in the clean-out of the facility API separator, CPI separator, and knockout pit. The resultant waste was accumulated as F037 and K051 waste, and shipped off site.

Puma also engaged in limited ACM removal activities around tank 603. This activity was necessary in order to proceed with demolition of tank 603.

Puma is also managing the facility drum storage area.

The demolition workplan prepared by Puma, Arcadis Environmental, and Sabre Demolition was approved in writing on March 14, 2012. The Work Plan covers all demolition activities in the facility and abandoned refinery, including abatement of ACM, and collection and disposal of hazardous materials that may be accumulated while cracking and demolishing piping.

Puma's contractor Sabre has begun the setup of scaffolding for Negative Pressure Enclosures (NPE) in areas A, B, C. Sabre is also taking background ACM samples in area N.

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

This action is being conducted under an AOC between Puma Energy Caribe LLC.

The CERCLA Work Plan was approved in writing on March 14, 2012.

2.1.4 Progress Metrics

See Attached Waste tables

Click Here For: [2012 Waste Table](#)
[2011 Waste Table](#)

2.2 Planning Section

2.2.1 Anticipated Activities

On June 9, 2011 Puma submitted the draft CERCLA Work Plan in accordance with the CERCLA Order on Consent. EPA reviewed this document and submit comments in writing to Puma. Puma re-submitted the draft CERCLA work plan on June 22, 2011.

Puma has submitted several iterations on the CERCLA Removal Action Work Plan. On March 14, 2012, EPA approved the RAWP in writing on March 14 2012. Puma's abatement and demolition

subcontractor (Sabre Demolition) will begin ACM abatement activities on March 19, 2012.

2.2.1.1 Planned Response Activities

Response activities for this action will include: removal of drummed hazardous waste, abatement of asbestos and demolition of the refinery portion of the facility, removal of other asbestos containing materials found in other areas of the facility, removal of sluges from the facility's API separator, CPI separator, and the knockout pit (these wastes are designated a K waste). Additionally, Puma will be demolishing tanks 452, 453, and 481, which are suspected to contain residual hazardous wastes. 452, 453 are suspected to be hazardous because of the elevated levels of benzene. Tank 481 is suspected to be hazardous waste because of the presence of corrosive materials.

2.2.1.2 Next Steps

Puma is preparing to send out solicitations for bid for demolition of the refinery. Additionally, Puma will be demolishing tanks 452, 453, and 481, which are suspected to contain hazardous wastes. 452, 453 are suspected to be hazardous because of the elevated levels of benzene. Tank 481 is suspected to be hazardous waste because of the presence of corrosive materials.

Puma completed Modification 04 of the CERCLA workplan in response to EPA's review of modification No 3. The Work Plan was approved in writing on March 14, 2012.

2.2.2 Issues

None

2.3 Logistics Section

Puma is providing EPA with a command post trailer to perform oversight activities. Puma is also providing utilities for operation of the trailer.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Puma has on-site a Site Safety Officer and a Assistant Safety Officer on Site daily. The SSO participates daily in operations meeting with Puma operational personnel and EPA.

2.6 Liaison Officer

OSC is acting as the Liaison Officer for the Site.

2.7 Information Officer

EPA OSC is acting as the Information Officer for the Site

2.7.1 Public Information Officer

The designated Information Officer for this Site is Elias Rodriguez PAD

2.7.2 Community Involvement Coordinator

The designated CIC for the Site is Brenda Reyes CEPD. Ms. Reyes has participated in several community events lead by EPA and Puma.

3. Participating Entities

3.1 Unified Command

This Site is not operated under a Unified Command

3.2 Cooperating Agencies

There are not designated assisting or Cooperating agencies. EPA communicates regularly with USCG Sector San Juan, PREQB, and the Army Corp of Engineers

4. Personnel On Site

EPA -1
RST -1 intermittent

5. Definition of Terms

none

6. Additional sources of information

6.1 Internet location of additional information/report

None

6.2 Reporting Schedule

EPA will continue to issue a polrep on a as needed basis while there is site activity.

Off-site, it will on an as-needed basis.

7. Situational Reference Materials

EPA SCORPIOS Report
TDD Summary Report