

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Hunt Oil - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #6
Progress
Hunt Oil
Z0D6
Orofino, ID
Latitude: 46.4803983 Longitude: -116.2585419

To:
From: Greg Weigel, OSC
Date: 12/12/2012
Reporting Period: October - November, 2012

1. Introduction

1.1 Background

Site Number:	Z0D6	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	12/12/2012	Start Date:	12/12/2012
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E12006	Reimbursable Account #:	

1.1.1 Incident Category

Removal under Unilateral Order

1.1.2 Site Description

On Friday, 30 December 2011, petroleum sheen was first reported near the east shoreline of the Clearwater River in Orofino, Idaho. The sheen was observed as blooms or bubbles emanating in the river several feet out from the water's edge. The source of the discharge was not known. There had been no recently reported spills that could be the source of the discharge. Sheen on the Clearwater River or adjoining shoreline at the seep location has been observed and documented on at least 16 separate occasions from December 30, 2011 through October 26, 2012.

The Clearwater River is a navigable water of the U.S.. It empties into the Snake River near Lewiston, Idaho.

The land adjacent to the impacted river bank is owned by private parties and Clearwater County. The nearby Hunt Oil gasoline and diesel cardlock distribution facility is located approximately 150 feet from the river bank and the seep location. Diesel and gasoline were stored on-site in above ground storage tanks. The facility is normally un-manned. Underground lines from the tanks service a nearby card-lock pump island. The facility has not been in operation since July, 2012 when a line tightness test was conducted and it was determined that at least one line failed. Subsequent excavation of the failed line confirmed that it had been leaking and that surrounding soils at the site are contaminated.

Gary J. Cantrell, Zella L. Cantrell and Hunt Oil are the owners of Hunt Oil facility. Atkinson Distributing, Inc. was the operator of the Hunt Oil facility. Gary J. Cantrell and Zella L. Cantrell are also officers of Atkinson Distributing, Inc

1.1.2.1 Location

The Hunt Oil/Atkinson Distributing site is located at 170 Riverfront Road in the city of Orofino, Clearwater County, Idaho, and is situated approximately 150 feet from the east bank of the Clearwater River. The site is approximately 1.4 acres in size. The topography slopes in a downward direction toward adjacent land and the Clearwater River. The site is located within the boundaries of the Nez Perce Reservation.

1.1.2.2 Description of Threat

The discharge is emanating along an approximately 50 foot segment of the bed and bank of the Clearwater River. Petroleum sheen is observed intermittently in the river and on the adjoining shoreline along this section. When the river level is low, exposing the bank and edge of the river bed, sheen is observed on the river bed through this section.

Access to the affected segment of the Clearwater River and adjoining shoreline is unrestricted. The river is used for a wide variety of recreational activities such as boating, fishing, and swimming, and there are public water intakes and a fish hatchery located downstream from the site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In January of 2012, surface water was sampled along the bank of the Clearwater River in the area of the observed discharge of oil. The laboratory analysis showed the following gasoline constituents in the river: (1) benzene at 20,200 ug/l; (2) toluene at 42,600 ug/l; (3) ethylbenzene at 2,700 ug/l; (4) xylene at 18,900 ug/l. These concentrations exceed Maximum Contaminant Levels established under the Safe Drinking Water Act. Also in January of 2012, soil was sampled along the bank of the Clearwater River in the area of the observed discharge of oil. Laboratory analysis showed high concentrations of BTEX gasoline constituents in the soil on the adjoining shoreline of the Clearwater River.

Due to the nature of the gasoline and diesel fuel operation at Hunt Oil facility and the proximity of this operation to the Clearwater River, Hunt Oil became a suspected source of the contamination at the river. On January 6, 2012, EPA notified Mr. Gary Cantrell of potential responsibility for this contamination, via issuance of a Notice of Federal Interest. Since that time, the Idaho Petroleum Storage Tank Fund (PSTF), which had indicated that they were the insurer of tanks at the Hunt Oil facility, has conducted investigations at and near facility, but no work of any kind was performed to clean up contaminated soils at the site or to mitigate the discharge of petroleum to the Clearwater River.

In February of 2012, three groundwater monitoring wells were installed by Respondents at or in close proximity to the facility. One of these wells was installed in a location which is up-gradient from the area of tanks, piping conveyances and dispensing equipment at Hunt Oil facility. The other two wells were installed in locations which are down-gradient from the area of the tanks, piping and dispensing equipment at facility. Soil samples were obtained from the borings. Groundwater samples were obtained from the three monitoring wells. Laboratory analysis showed there to be gasoline constituents in the groundwater at the following concentrations: (1) benzene at 22,800 ug/l; (2) ethylbenzene at 2,380 ug/l; (3) naphthalene at 452 ug/l; (4) toluene at 29,300 ug/l; (5) xylene at 12,900 ug/l; and (6) MTBE at 276 ug/l.

In April 2012, oil was found at a thickness of almost one foot floating on the groundwater in both downgradient monitoring wells. It was subsequently determined that the oil in MW-2 was predominantly gasoline and the oil in MW-3 was predominantly diesel fuel. Analysis of samples from MW-2 and from product in tanks at the Hunt Oil facility, was conducted by the U.S. Coast Guard Marine Safety Lab. The analytical results showed that gasoline in MW-2 was from the same source as gasoline that was in a tank at Hunt Oil facility.

On July 24, 2012 Atkinson Distributing and their contractor conducted a line tightness test of a few of the underground lines that run from the tank farm to the pump island. A test had earlier been done January, 2012, and all tested lines had reportedly held pressure, indicating that the lines were not leaking at the time of the test. However, when the test was repeating in July on the unleaded and premium gasoline lines, they failed, indicating that they had been leaking. The unleaded gasoline line was excavated and removed.

On July 30, 2012 a contractor for Atkinson Distributing installed three additional monitoring wells downgradient of the known contamination and leaking pipe(s) at the cardlock facility (between the facility and the seep at the river), for a total of six wells installed at the site to date. Groundwater monitoring has shown that all downgradient wells (monitoring wells 2 through 6) are impacted with BTEX gasoline constituents. Free phase LNAPL has been found in monitoring wells 2 and 4.

Even with this information, Hunt Oil and its owners and operators have not voluntarily accepted responsibility for the seep to the Clearwater River.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On November 19, 2012 EPA issued a Unilateral Administrative Order (UAO) pursuant to Section 7003(a) of the Resource Conservation and Recovery Act ("RCRA"). The UAO requires Hunt Oil and its owners and operators to remove an estimated 2,500 cubic yard of soil contaminated with gasoline at and near the facility.

2.1.2 Response Actions to Date

Hunt Oil and its contractor mobilized and began work to implement the requirements of the UAO on December 12, 2012. As of December 13, they had excavated approximately 440 cubic yards of soil and the excavation was approximately 1500 square feet in area. The impacted soil extends from 2 – 5 feet down to 18 feet below ground surface. The groundwater level in the excavation is at 17 feet.

The EPA START contractor, along with personnel from the Nez Perce Tribe, are on site and assisting the OSC with oversight.

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

The only identified PRP to date is Hunt Oil and its owners and operators. Petroleum from their facility is impacting groundwater at the site, approximately 140 feet from the seep location at the Clearwater River.

On 1/6/212, the OSC provided to Gary Cantrell, a owner of Hunt Oil, a Notice of Federal Interest (NOFI), identifying the facility as the suspected source of the release and encouraging them to take appropriate removal actions. A signed return of the NOFI was never received by the OSC. The NOFI was re-sent on 4/12/2012, with a request that it be signed and returned, but still has not been acknowledged. Atkinson, to date, has not acknowledged responsibility for the discharge to the Clearwater River nor taken sufficient action to effectively mitigate the discharge.

2.2 Planning Section

2.2.1 Anticipated Activities

Continue excavating source area contaminated soils until the OSC determines that cleanup goals have been achieved. A chemical application of a biodegradation compound and an oxygen release compound will be mixed with backfill soils to reduce the concentration of any residual hydrocarbons that could migrate into the excavation and re-contaminate the clean backfill.

2.2.1.1 Planned Response Activities

TBD

2.2.1.2 Next Steps

Refer to Section 2.2.1.

2.2.2 Issues

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

N/A

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Incident Command

EPA

3.2 Cooperating Agencies

Nez Perce Tribe
Clearwater County

4. Personnel On Site

As of 12/12/12:

RP Contractor - various

EPA START contractor - 1

Nez Perce Tribe - 1

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A