

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #7  
Hunt Oil  
Z0D6  
Orofino, ID  
Latitude: 46.4803983 Longitude: -116.2585419

**To:** Calvin Terada, EPA Region 10 (POLREP List)  
Beth Sheldrake, EPA Region 10  
Polrep Reporting EPA, NPFC (POLREP List)

**From:** Greg Weigel, OSC

**Date:** 3/19/2013

**Reporting Period:** December 2012 to March 2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	Z0D6	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	OPA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Assessment
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	12/12/2012	<b>Start Date:</b>	12/12/2012
<b>Demob Date:</b>	12/21/2012	<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>	E12006	<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Removal under Unilateral Order

#### 1.1.2 Site Description

See PolReps 1 through 6.

##### 1.1.2.1 Location

See PolReps 1 through 6.

##### 1.1.2.2 Description of Threat

Petroleum sheen has been observed intermittently since December 2011, and continues to be observed in the Clearwater River and on the adjoining shoreline along an approximately 150 foot section of the river, approximately 150 feet east of the Hunt Oil facility. Analytical results of surface water samples indicate benzene and toluene levels that exceed Federal and Idaho State applicable water quality criteria screening levels. The Clearwater River in the vicinity of the seep is a popular place for fishing and recreational activities such as river tubing. The Dworshak National Fish Hatchery is located approximately 4 miles downstream of the seep.

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

Since the first noted observation of sheen on the Clearwater River at the seep location, various entities, including the EPA, Nez Perce Tribe, Clearwater County, the Idaho Petroleum Storage Tank Fund and their contractor, and Hunt Oil and their contractor have been conducting investigations at the seep location, at the Hunt Oil facility and adjacent areas in an attempt to ascertain the source of the petroleum contamination that is causing the discharge to the Clearwater River. The investigations have included the installation of six monitoring wells around the Hunt Oil facility; the collection and analysis of numerous samples, including soil, groundwater, sediment, surface water, and product; and monitoring of groundwater levels and thickness of free-phase floating product in several wells at the Hunt Oil facility and downgradient from the facility. Samples have been analyzed for various constituents, including volatile organic compounds, semivolative organic compounds, and hydrocarbon forensics. The results of the various investigations have confirmed a release of gasoline from the Hunt Oil facility to groundwater. Of the nearby facilities that have formerly or currently store fuel in underground or above-ground tanks, the Hunt Oil facility is the only facility documented to have released gasoline-range hydrocarbons to subsurface soils upgradient of the seep location. Additionally, the results of forensic hydrocarbon analyses link gasoline stored at the Hunt Oil facility to the petroleum contamination on groundwater hydraulically downgradient of the facility.

Furthermore, groundwater gradient is from the facility to the Clearwater River at the seep location for a majority of the year.

Due to the nature of the gasoline and diesel fuel operation at the Hunt Oil facility and the proximity of the facility to the seep location, Hunt Oil became a suspected source of the contamination and sheen in the Clearwater River. On January 6, 2012, EPA notified Mr. Gary Cantrell, owner of Hunt Oil, of potential responsibility for this contamination and discharge to navigable waters of the United States, and encouraged that prompt action be taken voluntarily to prevent or mitigate the discharge. No significant action was taken until December 2012.

In November 2012, EPA issued a Unilateral Administrative Order (UAO) requiring that Hunt Oil and its owners clean up petroleum contamination associated with the site. Work was conducted pursuant to the UAO in December 2012. Approximately 2,300 cubic yards of petroleum contaminated soil was removed from the site. A chemical oxidant and oxygen release compound was applied to the saturated zone and capillary fringe while backfilling the excavation to treat excavation groundwater and petroleum constituents in soil at the margins of the excavation. The downgradient lateral extent of the excavation was limited because of a sewer line. Clearwater County requested that the excavation not encroach within 10 feet of the sewer line, approximately 80 feet from the river bank. Samples from the downgradient limit of excavation indicate the presence of gasoline constituent compounds remain in site soils that exceed applicable screening criteria.

Since the soil removal in December 2012, the Nez Perce Tribe has conducted site visits on an approximate weekly basis to examine if there continues to be discharge of sheen to the Clearwater River. On approximately 50% of those site visits sheen has been observed and documented on the Clearwater River or adjoining shoreline at the historical seep location.

On March 6, 2013 the EPA START contractor, Ecology and Environment, completed a Site Investigation Report for the Clearwater River - Orofino Oil Seep. The goals of the investigation were to identify the source or sources for the Clearwater River seep and develop a conceptual site model for the seep and its potential source(s). The investigation included reviewing all existing relevant information developed to date by the EPA, the Nez Perce Tribe, the Petroleum Storage Tank Fund and its contractor, and Hunt Oil and its contractor. The report concludes that the Hunt Oil facility is the source of petroleum contamination in the seep. The primary evidence that supports this conclusion includes:

- Slightly weathered gasoline in the seep is similar to gasoline stored at, and known to have been released from, the Hunt Oil facility;
- Analytical results of LNAPL on groundwater at the site "match" the product stored and distributed at the Hunt Oil facility.
- The Hunt Oil facility is located hydrologically upgradient of the seep location for most of the year;
- Sheen was observed during and since the time when gasoline is known to have been released from the Hunt Oil facility, and;
- Confirmation sampling results of the December 2012 soil excavation at the Hunt Oil facility show that the downgradient extent of petroleum-contaminated soil was not reached by the excavation. Significant petroleum contamination on the river-side of the sewer line is evidenced by high concentrations of BTEX and gasoline range hydrocarbons in downgradient monitoring wells.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

From December 12 through 21, 2012 Hunt Oil and its contractors conducted a removal action of petroleum contaminated soil, pursuant to the requirements of an EPA Unilateral Administrative Order issued under Section 7003(a) of the Resource Conservation and Recovery Act (RCRA).

#### **2.1.2 Response Actions to Date**

Hunt Oil and its contractors, AMEC Environment and Infrastructure, Inc. (AMEC) and Mangum Trucking LLC (Mangum), mobilized to the site and began work to implement the requirements of the UAO on December 12, 2012. A total of 2,300 cubic yards of petroleum contaminated soils (PCS) were removed. Contaminated soils were encountered from approximately 2 to 3 feet below ground surface to approximately a foot below the top of groundwater to a depth of approximately 18 feet. Approximately 2,000 cubic yard of excavated PCS was taken for landfarm treatment to a nearby location that was permitted by the Idaho Department of Environmental Quality for single application. The remaining 300 cubic yards of excavated PCS was hauled to a different permitted non-municipal solid waste disposal facility.

The excavation footprint measured approximately 80 feet NW to SE, by about 70 feet NE to SW. The southwest edge of the excavation was stopped approximately 10 feet northeast of a sanitary sewer line that bisects the property between the Hunt Oil facility and the Clearwater River. A chemical oxidant and oxygen release compound was applied to the saturated zone and capillary fringe while backfilling the excavation to treat observed petroleum contamination on the groundwater and at the extent of excavation.

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

#### **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 the Hunt Oil facility has contaminated groundwater at the site, and evidence indicates that it has migrated to the seep location at the Clearwater River. On 1/6/2012, the OSC provided to Gary Cantrell, an 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. Hunt Oil, 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

Post-removal monitoring of remaining monitoring wells at the site, as well as visual monitoring of the seep location, indicate that significant petroleum contamination remains in soils and groundwater at the site from the downgradient extent of excavation and extending southwest to the Clearwater River. A teleconference is scheduled for April 2, 2012 with EPA and it's contractor, Hunt Oil's representative and contractor, and the Nez Perce Tribe, to discuss what has to happen next at the site.

#### 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

### 2.4.1 Narrative

The Oil Spill Liability Trust Fund was opened for this project with an initial FPN project ceiling of \$100,000 for necessary EPA-lead site investigation activities. The ceiling was increased to \$200,000 to cover the costs of oversight of the RP-lead cleanup action and development of the site investigation report.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
PRFA w/ Nez Perce Tribe	\$10,000.00	\$10,000.00	\$0.00	0.00%
START contractor	\$85,000.00	\$85,000.00	\$0.00	0.00%
<b>Intramural Costs</b>				
USEPA - Direct	\$15,000.00	\$12,000.00	\$3,000.00	20.00%
USEPA - InDirect	\$15,000.00	\$10,000.00	\$5,000.00	33.33%
<b>Total Site Costs</b>				
	\$125,000.00	\$117,000.00	\$8,000.00	6.40%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 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

N/A

**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

POLREP #7 Last Updated 3/19/2013