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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #3**
PCB removal begins, oil investigation continues
CUC Rota Power Plant

Songsong, MP
Latitude: 14.1366670 Longitude: 145.1358330

To:
From: Michelle Rogow, OSC
Date: 4/15/2013
Reporting Period: April 3 - 14, 2013

1. Introduction

1.1 Background

Site Number:	Z9D9 / 09WV	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA/OPA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	4/3/2013	**Start Date:**	4/3/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:	E11903	**Reimbursable Account #:**	

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 are 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

Begining of PCB cleanup and further assessment of diesel in soil and groundwater.

2.1.2 Response Actions to Date

MONDAY April 1, 2013 – WEDNESDAY April 3, 2013: Crew mobilized to Rota.

WEDNESDAY April 3, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, SEARCH – 1, PSC - 2: OSC Rogow and CUC David Atalig hosted an introduction briefing for EPA crew and CUC Power Plant staff on activities of the project, roles and responsibilities, coordination, communication and health and safety. After the briefing EPA held a tailgate safety meeting and task orientation for the next few days for site set up. ERRS began unpacking their supply container. USCG helped START unpacking and organize sampling supplies. START attempted to get the GPS to function, but could not gain access to the server. OSC Rogow went with the staff archeologist to CNMI HPO to review the monitoring plan, make introductions and coordinate on activities. They also visited CNMI CRM and received the minor permit, reviewed conditions and coordinated on site activities. Many of the CRM permit conditions were not appropriate and applicable to the site, so CRM Pendergrass requested that OSC Rogow submit a clarification letter to CRM. That letter was prepared and emailed to CRM and DEQ that evening. The SEARCH Archeologist and OSC Rogow also visited the sugar mill historic preservation site. 3 – 20' empty containers were delivered. The forklift that was delivering the containers broke and more containers will be delivered when it is repaired. Additional investigation on sources of the oil and potential remedies was discussed with each of the agencies.

THURSDAY April 4, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, SEARCH – 1, PSC - 2: OSC Rogow received a copy of the DEQ permit. Phillips Services, the company responsible for transportation and disposal was on site to make logistics arrangements for containers moving on site for loading and transportation off site, once loaded. OSC Rogow reviewed the manifest and shipping documents with ERRS and PSC, and some issues were addresses and PSC was working to resolve them. Once the grass was cut, and the START was still having issues with the GPS, the excavation grids began to be lined out by hand. The hottest area was delineated, and ERRS began excavation of the area, with archeological oversight. By the end of the day, 8 cubic yard boxes were filled and loaded in to the first container. START continued to lay out the excavation grids and began to lay out the confirmation sampling grid. Samples were collected on the grids that fell into areas with contamination under 2 mg/kg, so that excavation would be conducted in proper locations in the lower concentration areas. USCG provided assistance as needed. 5 empty containers were delivered by forklift and 3 empty containers were delivered on chassis. OSC reviewed operational procedures with USCG

FRIDAY April 5, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, SEARCH – 1, PSC - 1: START and USCG worked on labeling and packing of samples, and the first sample shipment was dropped off for shipment. ERRS worked on blocking and bracing of the first container and then excavation resumed. The first container was filled (with 16 boxes) and blocking and labeling and placarding completed. In the afternoon, the first container was picked up and a new container from the port was brought in. Some concrete was encountered during excavation and the archeologist continued to provide guidance on excavation, concerns and items of significance. The second container was filled with 16 boxes of soil, blocked and braced, placarded and readied for shipment. At the end of the day, the second container was transferred off site to the port. PSC continued to work with the shipper and transporters to get containers moved in and out and for the first containers to be shipped out on Monday April 8. By the end of the day, 26 boxes were loaded, for a total of 34. CUC water personnel were on site to scout out a water pipe. The excavator was used to locate it and the water staff determined that the pipe was already out of service and was not an issue. OSC reviewed daily work order practices with USCG staff.

SATURDAY April 6, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, SEARCH – 1, PSC - 1: START and USCG sampled concrete that had been pulled from the excavations conducted to date. In addition, START sampled the bottom of excavations, in 8 sample locations. Excavation of the hottest areas continued, with 37 boxes of soil filled by the end of the day, for a total of 71. The third and forth containers were packed, labeled and placarded for transfer off site on Monday. Loading of the fifth container began. Archeological monitoring continued, with the discovery of a walled structure of some sort in the deeper excavation. The walls were damaged on top, but appeared to be intact at deeper depth. The archeologist recorded the feature and efforts were made to avoid doing any further damage to the structure. OSC reviewed the consolidated site safety plan and discussed oil response strategies with the USCG.

SUNDAY April 7, 2013: Day off

MONDAY April 8, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, DEQ - 2, SEARCH – 1, PSC - 1: DEQ staff arrived on site to assist with operations and were briefed before starting work. CRM Pendergrass visited site and conferred with OSC Rogow. Some scouting of the alleged oil tanks was conducted. The 2 loaded containers (3 and 4) were picked up and transferred off site to the port for transport to Guam. ERRS completed loading the 5th container. CUC power distribution was on site picking up a power pole. PSC continued to coordinate with the transporters and make arrangements to ensure that all 5 containers were loaded onto the vessel for transport to Guam. ERRS continued to excavated contaminate material, load boxes and fill containers. The 6th and 7th containers was filled and loading of the 8th container began. START sent another set of samples off to the laboratory and sampling of completed excavations was also performed, with 8 of confirmation samples taken today. Today, 41 boxes were filled, for a total of 112 to date.

TUESDAY April 9, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, DEQ - 2, SEARCH – 1, PSC - 1: Excavation of the contaminated areas continued, with completion of the areas over 1.3 mg/kg to a depth of 2' and deeper excavation began. More concrete walls and structures that are potentially Japanese in origin were encountered and excavation slowed as to not disturb any of the structures. (Note: structures were already damaged at least 1-2' as evidenced by the rebar which was exposed beyond the current tops of the concrete). The archeologist oversaw and directed excavation in this area and documented the structures as excavation and unearthing continued. ERRS and START visited the borrow source which is going to be used for backfill and START sampled the material. ERRS began to

transfer the assessment investigative derived soils from drums into boxes for disposal. CRM Pendergrass was on site and expressed his concern regarding EPA's notification of HPO. CRM Pendergrass phoned the CUC Deputy Director and called HPO regarding checking out the project site. HPO Antonelli Rosario came out to the site and observed the excavation. He concurred that the structure was not major and that excavation could continue. By the end of the day, 26 boxes of soil were filled, for a total of 138 boxes to date. Container #8 was completed and container #9 began to be loaded.

WEDNESDAY April 10, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 5, DEQ - 2, SEARCH – 1, PSC - 1: In the morning, news came that the samples which had been shipped out the previous week were thought to be lost by the post office. START sent off the samples from the previous day. Excavation of the deepest areas continued, with excavation activities slowing around the potentially historic feature which was found in the ground in the area of the deepest excavation. CNMI HPO was on site and observed the features which had been located and provided guidance to continue operations and documentation. They also requested that some bricks and other pieces of the former sugar mil be saved, if they were uncontaminated or could be decontaminated. Toward the base of the excavation, a concrete floor was found. The inside of the structure was excavated and the area was cleaned out for sampling. The samples were taken of the concrete floor in areas where there was no soil remaining. START collected samples of all areas where excavation was completed and in areas that were previously sampled and that had possibly been lost by the post office. By the end of the day, 10 boxes of soil were filled, for a total of 148 boxes to date. Container #9 was completed and container #10 began to be loaded. Samples were packed up for shipment.

THURSDAY April 11, 2013: Personnel on-site: ERRS – 3, SEARCH – 1, PSC - 1: The OSC, 2 START, 2 DEQ, 2 USCG and 2 ERRS demobed from the site. Most of the crew traveled to Saipan to work on other sites, while awaiting analytical data from the mainland laboratory so areas can be re-excavated or backfilled. The remaining crew worked on emptying the 40' container of supplies and storage of materials for demobilization. The archeologist continued documentation of the features which were found. START received word that the first set of samples were not lost and had reached the laboratory. START sent the Wednesday samples off from the post office in Saipan.

SATURDAY April 13, 2013: START received results of the first set of samples. The second set of samples had also been received at the laboratory.

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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
PCB contaminated soil	**soil**	**148 cu yd boxes**			**5 containers**

2.2 Planning Section

2.2.1 Anticipated Activities

Awaiting confirmation sampling data to determine next steps for addressing PCB contamination on site.

Review geophysical investigation and report, and assess findings of report to see what impact the subsurface conditions have on the oil in the subsurface and on a potential remedy to prevent oil from continuing to discharge to waters of the US. Prepare for installing test pits in various locations to determine further subsurface conditions, locate potential sources and gather information for remedy determination.

2.2.1.1 Planned Response Activities

Two separate response actions are being planned: 1) to address PCB contamination and 2) to address oil discharge to waters of the US. This mobilization is to conduct the PCB cleanup, and to further assess and plan the oil spill response.

2.2.1.2 Next Steps

Continue and complete PCB cleanup. Continue assessment and planning for the oil spill.

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

All of the equipment and supplies, including the excavator and forklift had to shipped in from Guam, since no available, properly working equipment is available on island.

Shipping on and off island is subject to weather conditions and issues with the transporation barge to and from Rota.

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
US Coast Guard
CNMI Coastal Resources Management
CNMI Historic Preservation Office

4. Personnel On Site

USEPA - 1
START - 2
ERRS - 5
CNMI DEQ - 2
USCG - 2
SEARCH - 1

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.