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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #4**
Oil investigation continues and PCB cleanup is completed
CUC Rota Power Plant

Songsong, MP
Latitude: 14.1366670 Longitude: 145.1358330

To:
From: Chris Reiner, On-Scene Coordinator
Date: 4/21/2013
Reporting Period: 4/16 - 6/17/2013

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:	4/24/2013	**Completion Date:**	6/17/2013
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 an active diesel-powered electrical plant where contaminated soil and groundwater are present. The contaminants of concern at the Site are polychlorinated biphenyls (PCBs) in soil and petroleum hydrocarbons in groundwater. The 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. EPA is addressing the PCB contamination by excavating the contaminated soil and shipping it off-island for disposal. The estimated clean-up volume is 200 cubic yards.

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
Latitude: 14.1366670
Longitude: -145.1358330

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

TUESDAY April 16, 2013: Personnel on-site: SERAS – 1: SERAS Grossman arrived on island and began to calibrate equipment and prepare supplies for the arrival of ERT Johnson and the beginning of sampling.

WEDNESDAY April 17, 2013: Personnel on-site: EPA – 1, SERAS – 1: ERT Johnson arrived on site and worked with SERAS Grossman to prepare for groundwater sampling. The results from sample set number two were received from the laboratory.

THURSDAY April 18, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 3, SEARCH – 1: ERT and SERAS began groundwater monitor well sampling. By the end of the day, MW -1, MW-3 and MW-4 were sampled and SERAS prepared samples for shipment. Analytical data from sample sets 3 and 4 were received. A portion of the ERRS crew, START personnel and OSC Rogow mobilized back to the site to begin re-excavation. USCG personnel and archeologist also arrived on site. Both the areas in need of re-excavation and the areas which were below the action level were marked and areas for re-excavation were lined out. Excavation of the contaminated areas continued, in sample areas 31, 40 44 and 45. The archeologist oversaw and directed excavation in this area and documented the structures as excavation and unearthing continued. By the end of the day, 18 boxes of soil were filled, for a total of 166 boxes to date. Container #10 was completed, and container #11 begun. START collected re-excavation sampling in areas that were completed. The crane which moves containers to and from the barge is broken and therefore it is unclear when the container ship will arrive and when the full boxes will be able to be transported off site for shipment to the mainland.

FRIDAY April 19, 2013: Personnel on-site: EPA – 1, START – 2, USCG – 2, ERRS – 3, SEARCH – 1: ERT worked with OSC Rogow and ERRS to identify and excavate test pits in the areas where more information needed to be obtained about the oil spill source and in an effort to mitigate the ongoing discharge from the facility. The archeologist oversaw and directed excavation in at test pits and documented anything encountered. The archeologist met with HPO who provided clarification that metal and brick structures could be placed back in the excavation area. ERRS deconned the excavator and began to place clean rock and concrete back into clean areas. ERRS coordinated with GPPC on backfill slated to begin in the next few days. SERAS shipped off the first round of groundwater samples and START shipped off confirmation samples that were collected the previous day. START worked on an inventory of remaining supplies. USCG worked with ERRS on excavation of a small segment that needed attention.

SATURDAY April 20, 2013: Personnel on-site: EPA – 2, START – 2, USCG – 2, ERRS – 5, SEARCH – 1: ERRS continued to work with ERT on the excavation and backfill of test pits to determine the location of oil and locations for potential response measures. The archeologist oversaw and directed excavation in at test pits and documented anything encountered. Confirmation samples received indicating that excavation is complete based on Pro UCL calculation of mean concentration. Still awaiting confirmation samples on a couple of small areas not expected to change Pro UCL results. ERRS began backfilling of excavation areas where confirmation samples came back clean. OSC Reiner arrived on site, OSC Rogow demobilized.

SUNDAY April 21, 2013: Day off

MONDAY April 22, 2013: EPA – 1, START – 2, USCG – 2, ERRS – 5, SEARCH - 1: ERRS completed backfilling of excavated areas. Several test pits attempted but unsuccessful due to sandy soil conditions causing pits to cave in before reaching groundwater. No further test pit work will be done. START begins packing of equipment and supplies to be shipped to DEQ offices on Saipan.

TUESDAY April 23, 2013: EPA – 1, START – 2, USCG – 2, ERRS – 5: Archeologist demobilized from site due to completion of excavation and test pit work. ERRS decontaminated equipment and loaded it onto transport racks for port personnel to come pick it up. Containers of waste labeled and sealed for shipment, ready for pick-up by port personnel when crane is fixed. 7 coolers of equipment shipped to DEQ.

WEDNESDAY April 24, 2013: ERRS, START, USCG and EPA demobilized from site.

THURSDAY May 2, 2013: Final confirmation samples received, confirming Pro UCL results that indicated mean concentration below the site action level.

MONDAY June 17, 2013: After significant delays due to equipment issues at the Port of Rota, the containers of waste were picked up and transported off-island for disposal.

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**	**176 cu yd boxes (11 shipping containers)**			**X**

2.2 Planning Section

2.2.1 Anticipated Activities

Closure and final documentation and reporting on the PCB cleanup.

Continue to brainstorm and research options for oil spill mitigation.

2.2.1.1 Planned Response Activities

Two separate response actions are being conducted: 1) to address PCB contamination and 2) to address oil discharge to waters of the US. This mobilization was to conduct the PCB cleanup, and to further assess and plan the oil spill response. The PCB cleanup has been completed and the oil spill mitigation planning continues

2.2.1.2 Next Steps

Complete PCB cleanup documentation. 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. Now that project is completed, all the heavy equipment needs to be shipped back to Guam.

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

The crane which loads and unloads the barge at the Rota port broke sometime the week of April 15th and therefore the vessel that was supposed to come in from Guam was delayed. All shipping off site is at the mercy of the crane being fixed and the vessel arriving and leaving again.

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 - 2
START - 2
ERRS - 5
SERAS - 1
CNMI DEQ - 1
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.