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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #5**
Installation of Oil Interception Trenches begins
CUC Rota Power Plant

Songsong, MP
Latitude: 14.1366670 Longitude: 145.1358330

To:
From: Michelle Rogow, On-Scene Coordinator
Date: 6/2/2014
Reporting Period: 1/21-6/1/2014

1. Introduction

1.1 Background

Site Number:	Z9D9 / 09WV	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	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 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

Oil has been seeping out along the shoreline along a 200'foot stretch for an unknown period of time. The

source has not been able to be identified, although it clearly comes from the CUC Rota Power Plant property, through Commonwealth Ports Authority (CPA) land to the ocean. Groundwater wells installed on the CUC Power Plant facility are contaminated with disolved and free phase product.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During this time period, crews and equipment were mobilized to the site, site setup began and work began on installation of the first trench segment on the interceptor trench on CPA land.

2.1.2 Response Actions to Date

January 21 - January 30, 2014: Planning activities for work on Rota, including meetings with ERRS on logistics, archeology, water treatment, resources and supplies needed for oil spill response work.

May 9, 2014: Meeting with ERRS regarding waste profiling, containers and logistics for oil spill response work.

TUESDAY May 20, 2014: Meeting with ERRS regarding planning, equipment, logistics and coordination with CUC for oil spill response work.

WEDNESDAY May 21, 2014: Personnel on Saipan: EPA – 1, OSC Rogow arrived the previous day, in Saipan to coordinate logistics, permitting and access. OSC Rogow had meetings with CUC, checked with DEQ on the erosion control permit and clarified that some of the project work would be outside the CUC fence line on CPA property. DEQ staff agreed that was known and allowed, even though the permit specified inside the CUC facility. CUC received a call from the receiving agent on Rota who conveyed that all of the containers, flat racks and heavy equipment for the site have been delivered to Rota. The OSC coordinated with the agent and obtained information for ERRS to get containers and equipment released.

THURSDAY May 22, 2014: Personnel on Saipan: EPA – 1, ERRS – 7, ERRS arrived on Saipan Wednesday night, although the ERRS RM got stuck on Guam, and mobilized to Saipan on Thursday night. The OSC coordinated with the FCA in absence of the RM to work on getting containers and equipment released from the Rota Port. The OSC packed supplies for Rota at DEQ, visited CNMI HPO to discuss permit and work to be performed, and coordinated with CPA on access, since the main interceptor trench is located on CPA land. OSC Rogow also coordinated with CUC on logistics and schedule for the work.

FRIDAY May 23, 2014: Personnel on Saipan and on site: EPA – 1, ERRS – 4, ERRS crew mobilized from Saipan to Rota via Star Marianas. OSC Rogow met with the RM and brought gear from Saipan to be shipped to Rota with ERRS. Once on Rota, ERRS arranged for the 40’ container of supplies from Saipan to be delivered to the site, and it was delivered in the afternoon. ERRS began inventory and organization of the 20’ container of supplies left on site, and worked with customs to release supplies which had been received by the US Post Office. ERRS RM and FCA coordinated with the Rota Port, stevedore and shipping agent to try to get containers from the Mainland released. OSC Rogow met with CUC regarding work and needs. OSC Rogow also coordinated with CRM, DEQ and CPA on permits and access.

SATURDAY May 24, 2014: Personnel on Saipan and on site: EPA – 1, ERRS – 8, ERRS began unloading of 40’ container from Saipan, and finished organizing 20’ container that was on site. START arrives on Rota. OSC Rogow worked on the health and safety plan and permitting document review. OSC Rogow also coordinated with CRM on the minor permit and work to be performed.

SUNDAY May 25, 2014: Personnel on Saipan and on site: EPA – 1, ERRS – 1, ERRS crew day off. OSC Rogow mobilizes to Rota, meets with START and ERRS to set plan for the next few days. The heavy equipment and supplies needed to begin work are still held up at the Rota Port. OSC and ERRS to work on getting equipment and containers released. SEARCH archeologist arrives on Rota.

MONDAY May 26, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 3, SEARCH – 1: Held meeting with ERRS RM and foreman, START PM and Archeologist. OSC Rogow and ERRS RM went to the Rota Port to coordinate with CPA on the release of the containers and equipment. The OSC RM and FCA spent most of the day back and forth between the equipment rental company, Rota Port, the local stevedore and the receiving agent, trying to get payments issued and credited, and approval for release of the heavy equipment and containers. Approval was finally granted for the heavy equipment, and it was moved to the site from the port, after it was inspected and fueled. Issues still remained with the 2 containers from the mainland and the flat racks with the shoring.

TUESDAY May 27, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 8, SEARCH – 1: Entire crew on site. OSC Rogow and ERRS RM 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. Site briefing and health and safety plan were reviewed. The crew met with CUC representative Cliff Atalig, who assisted with coordination on logistics. CUC agreed to provide diesel fuel for the heavy equipment and ERRS coordinated with CUC on how that would be accomplished. The Mayor’s office delivered a porta potty. ERRS finished unloading the 40’ container from Saipan. Arrangements were made for the 20’ supply container from the Mainland to be delivered to the site, and ERRS began unloading of that container. Excavators worked in tandem to remove vegetation and debris from the area and CUC power distribution removed the power lines in the work area to avoid any issues. CUC also moved a 20' storage container to provide more work area for EPA. EPA requested to remove a portion of the CPA fence, but agreed to repair it when the project was completed. OSC Rogow went with the staff archeologist to CNMI HPO to review the monitoring plan, make introductions and coordinate on activities. The OSC and START visited CNMI CRM, however they were not in the office, but came by the site and reviewed conditions and coordinated on site activities. CUC agreed to supply diesel for heavy equipment as a contribution to the response action. Given the cost of fuel on Rota, over the duration of the project, this will be a sizable

contribution. START and the OSC went to the post office, and found out that mail is only going out one or two days a week, and not on any regular schedule, so we would need to check with the Post Office a few times a week to get information on when shipping of samples could happen. The OSC and START also went to the DEQ Rota office to check on supplies which had been stored there, and see if the groundwater parameter equipment had arrived. Due to the flight schedule, the groundwater parameter equipment had not yet been shipped. The OSC and ERRS RM went to the rock quarry to look at rock stockpiles and discuss what they had versus what was needed. A decent size rock was identified, but it needed to be washed due to all of the fines still remaining in the material. Personnel at the quarry said that all arrangements would need to be made through their Saipan office.

WEDNESDAY May 28, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 8, SEARCH – 1: Clearing of vegetation and debris along the CPA fence was completed. EPA received approval for removal of the CPA fence and took down what was needed for operations. The 40' container from Saipan and the 20' container from the mainland were transported off site and the 40' container from the mainland was delivered and dropped to remain until the project end. CUC power distribution came and removed debris and equipment from the area of the recovery trench. CNMI CRM and HPO were on site. Set up activities continued, including installation of erosion control measures, including silt fence around the excavation area and soil stockpiles, and installation of sorbent boom along the shoreline. The archeologist monitored the excavations for the silt fence installation. ERRS worked with CUC on fueling operation setup. Flat racks with the shoring were dropped and ERRS began unloading the racks.

THURSDAY May 29, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 8, SEARCH – 1: ERRS finished unloading the remaining shoring from the flat racks, installed silt fence for first soil stockpile area, and began excavation of over burden from trench width. Archeological monitoring of excavations was conducted. ERRS used the overburden to fill sandbags to hold down visqueen on the soil stockpiles. ERRS completed removal of the CPA fence in the operational area and installed construction fencing to protect the excavation area. START collected samples of what is believed to be clean overburden. CRM, CPA and HPO were on site. Some of the pallets were removed from the 40' container, so that more room for storage was available.

FRIDAY May 30, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 8, SEARCH – 1: The site was impacted by heavy rains overnight and in the early morning, however stockpile erosion control measures were sufficient. ERRS moved shoring around, installed silt fence for 2 new soil stockpile locations: one clean and the other; relocated and staged equipment, and began installation of the first trench box, working to bring the excavation to design depth. Once groundwater was encountered, it was evident from odors that the groundwater was contaminated with petroleum. The flat racks which held the shoring were moved off site. The RM continued to work with the quarry for rock, but was told that the rock washer was broken and they would not wash the rock without it. START collected additional samples of the overburden and sent the first round of soil samples off to the Mainland. The washer at the quarry was still broken and no rock had been able to be delivered yet.

SATURDAY May 31, 2014: Personnel on-site: EPA – 1, START – 1, ERRS – 8, SEARCH – 1: Work continued on excavation of the first segment of trench, using the rock hammer. In the vicinity of the groundwater table, the lithology of the subsurface changed drastically, from sandy, gravely material to hard limestone and coral. Therefore, the rock hammer was utilized to break the substrate. The excavator worked in tandem with the rock hammer. And material was broken and stockpiled in a separate location for sampling. Since the groundwater had odor of contamination, this material was assumed to be contaminated, and would be sampled by START to get concentrations and disposal profile information, if necessary. It was determined that in order to use the shoring end plates effectively, it would be best to cut the 1" plates into smaller plates. Cutting gases were procured to cut the plates and an attempt to cut the plates was made by the crew. OSC Musante arrived on island.

SUNDAY June 1, 2014: DAY OFF

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

Responsible party (CNMI CUC) has been providing assistance, logistical support and supplies, including diesel fuel for heavy equipment.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

Work to continue on installation of interceptor trench.

2.2.1.1 Planned Response Activities

Installation of interceptor trench on CPA land.

Installation of recovery trench on CUC Rota Power Plant property.

Loading of contaminated soil into boxes, and containers for off site transport to Mainland for disposal.

Sampling of groundwater wells and sampling of soils generated from excavations.

2.2.1.2 Next Steps

Continue installation of interceptor trench segment by segment.

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.

Equipment was brought from Guam and if repair is needed, it could slow or stop production on site.

Rock for the trench needs to be washed to remove fines, and the rock washer at the quarry has been broken.

Coral substrate has been a challenge to remove which has been slowly operations.

Archeological artifacts have been encountered, which impacted operations, however the archeologist and HPO have been cooperative in expediting the work they need to do and keeping the project moving forward.

2.3 Logistics Section

All of the equipment and supplies, including the excavators and forklift had to shipped in from Guam, since no available, properly working equipment is available on island. If any maintenance is needed, there will be a long lead and response time due to limited flights from Guam to Rota.

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

Shoring brought from the mainland is being used for trench system.

Other supplies and equipment are extremely limited in 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
Commonwealth Ports Authority

4. Personnel On Site

USEPA - 1
START - 1
ERRS - 8
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.