

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lance Oil Gasoline Spill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #9
Progress
Lance Oil Gasoline Spill
Z4SJ
Atlanta, GA
Latitude: 33.7961071 Longitude: -84.3697697

To: Kris Garcia, Atlanta Watershed Management
Jim Webster, USEPA R4 ERRB
Matt Taylor, USEPA R4 ERRB
Jim McGuire, USEPA R4 ERRB
Matthew Fischer, USCG
Steven Natale, USCG

From: Rick Jardine,

Date: 1/23/2015

Reporting Period: 10SEP14 to 23JAN15

1. Introduction

1.1 Background

Site Number:	Z4SJ	Contract Number:	EP-S4-0704
D.O. Number:	0704-F4-0084	Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/21/2010	Start Date:	4/17/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E10416	Reimbursable Account #:	

1.1.1 Incident Category - Emergency Response to an Oil Pollution Incident

1.1.2 Site Description - Lance Oil Gasoline Discharge

1.1.2.1 Location - 1539 Piedmont Ave, Atlanta, Fulton County, GA

1.1.2.2 Description of Threat - Oil in surface water

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On or prior to Saturday 17APR10 RP Lance Oil Company retained GA Oilmen's Services (GOS) to advise regarding discrepancies in fuel volume accounting for a 4,000 gallon UST. The RP retained SWS to conduct initial defensive tactics (placing absorbent boom in creek) and GOS to manage the overall project including determining and mitigating the root cause. GOS has made the determination that an old steel UST that failed tightness testing was the source of the oil discharge and had the remaining gasoline removed from the tank. GOS coordinated their efforts with the GAEPD UST Program and City of Atlanta Watershed Management Environmental Section.

On Wednesday 21APR10 a concerned citizen contacted EPA who mobilized to the scene and, in turn, notified GA EPD Emergency Response Program. Free product was observed flowing into the creek and the original absorbent boom was saturated to capacity with oil. EPA instructed GOS to immediately replace the boom and apply additional absorbent materials to minimize the flow of oil into the creek. OSC Jardine and GOS then discussed a more robust strategy of excavating cutoff trenches to intercept the flow of oil prior to it entering the creek. GOS has conducted the preparatory activity including utility search and access approvals.

On Thursday 22APR10 OSC Jardine issued a Notice of Federal Interest to Lance Oil (c/o GOS Mark Faas) and reconned site with GOS and Pittman Grading. EPA clarified objectives and Pittman set out to develop tactics. GOS continued to coordinate activity and change out oil-saturated materials. OSC Jardine identified concern regarding oil sheen continuing to escape

confinement.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative - During this reporting period EPA convened a face-to-face meeting on 03OCT14 to discuss 1) accomplishments of Lance Oil regarding project over previous 18 months (e.g. total recovery/reduction of oil, construction accomplished, oil observations via well or surface water, plume delineation, estimated time to project completion); 2) provisions of the Order and proposed way forward (proposed change in Project Manger credentials and Site history of Steve Smith; also proposed work force); 3) history and cause of recurrent oil sheening - and proposed remedy. At the meeting were representatives from EPA, Lance Oil, GA EPD, and Atlanta Watershed Management.

During the meeting, Lance Oil identified a reduction in plume free product from a depth of 6 feet to less than one foot. Lance Oil identified Steve Smith as the new proposed Project manager to replace Mark Faas who withdrew from the project. EPA accepted the suitability of Mr Smith. Other discussion during the meeting included Lance Oil not following EPA operational procedures in well or stream monitoring. One example being Mr Brooks (owner of Lance Oil), an untrained technician, who failed to recognize crude oil discharges during his monitoring, plus EPA observations of Mr Brooks introducing chemical agents to the monitoring wells. Further discussion included the failure of Lance Oil to determine the extent of the subsurface oil plume. Lance offered that the plume, although not delineated, had shrunk in size due to the vapor phase destruction of the past 12 months. EPA agreed to allow for another monitoring episode or two prior to enforcing the provisions of the Order regarding plume delineation.

Since that time, additional stream sampling indicate exceedance of in-stream water quality standards (observed release) for which Lance Oil has conducted appropriate reporting.

2.1.2 Response Actions to Date - During this reporting period, Lance Oil has maintained absorbent materials to intermittent discharges to Clear Creek, conducted notifications to the NRC for respective discharges, monitored six monitor wells and the intercept trench.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs) - EPA will evaluate the performance of Lance Oil with respect to implementing measures identified in the Amended Administrative Order. Additionally, EPA RCRA Enforcement will evaluate discharge events.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities - EPA will continue to monitor water quality and effectiveness of countermeasures taken by Lance Oil pursuant to the Amended Administrative Order.

2.2.1.1 Planned Response Activities - Lance Oil will continue to monitor the stream bank, temporary wells and intercept trench for free product. Any free product will be recovered immediately and destructed in their on-Site desorption unit. Lance Oil will also maintain viable absorbent boom in the stream.

2.2.1.2 Next Steps - To be determined.

2.2.2 Issues - Construction of countermeasures has levied a somewhat destructive effect to the surrounding banks of this Creek. There are several entities with jurisdictional authority or primacy of interest. These entities include the US Army Corps of Engineers, Atlanta Watershed Management, and Piedmont Conservancy.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

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.

POLREP #9 Last Updated 1/23/2015