U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Turkey Brook Oil Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #4**
Progress Report
Turkey Brook Oil Site
Z1D7
Oakville, CT
Latitude: 41.5981610 Longitude: -73.0754130

To: Polrep Distribution, USEPA-R1

From: Ted Bazenas, OSC
Date: 6/10/2014
Reporting Period: 02/07/14 thru 06/10/14

1. Introduction

1.1 Background

Site Number:	Z1D7	**Contract Number:**	EP-W-08-062
D.O. Number:	0036	**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:	8/23/2013	**Start Date:**	8/21/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Request for Assistance
FPN#:	E13104	**Reimbursable Account #:**	

1.1.1 Incident Category

Investigation activities to define the extent of the petroleum plume area and associated petroleum spill clean up activities.

1.1.2 Site Description

The Turkey Brook Oil Site is a property with an active commercial building located at 20 McLennan Drive, Oakville, Connecticut. The building contains an automotive parts manufacturing business. The business is operating on the property as a tenant. As of June 2014, the tenant is planning on relocating the business to another nearby building.

1.1.2.1 Location

The site is located at 20 McLennan Drive in Oakville, Connecticut. The site is immediately surrounded by industrial properties with residential properties within 1/4 mile radius. It is bordered to the west by Turkey Brook and various industrial properties, to the north by McLennan Drive, the east by industrial properties, and to the south by residential properties. According to the information in GIS ArcMap 10.1, there are 768 people within 1/4 mile, 1,999 people within 1/2 mile, and 6,468 within 1 mile of the site.

1.1.2.2 Description of Threat

Due to various oil releases at the facility over time, there is currently a layer of oil on top of the groundwater underneath the facility. This is causing oil to escape out of the banks of Turkey Brook resulting in a sheen on the water. Until October 2013, there was a temporary system in place to separate and collect the oil from the groundwater. During the month of October, the contractor that was hired by CTDEEP to install and maintain the system removed the system from the site due to lack of funding to support the system. The removal of that system allowed a small sheen to continue to develop on the surface of Turkey Brook. The absorbent boom installed by EPA during the Emergency Response action prevented the sheen from traveling downstream. The threat of and actual discharge to Turkey Brook will continue until the source area is properly addressed and removed. Turkey Brook is a navigable waterway which leads to the Steele Brook which leads to the Naugatuck River. Disposal of oil-contaminated boom and sorbents, and free oil is ongoing.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On October 25, 2013 a site walk was performed with EPA and its contractors, the Superfund Technical Assessment Response Team (START) and the Emergency Rapid Response Services (ERRS) to assess the condition of the discharge area and develop a plan for the plume investigation activities. During the site walk it was determined that more efficient and functional boom was necessary to prevent the oil from migrating downstream. Since the removal of the oil collection system, the absorbent boom had been monitored and maintained as necessary by the ERRS contractor. The rate at which the absorbent boom was being changed out was deemed inefficient by the OSC. Therefore, the OSC requested that the ERRS contractor provide a boom that would more efficiently contain the release of oil over an extended period of time and that would require less maintenance.

A site investigation plan with the START contractor was conducted on November 20th to November 22nd, 2013 and included Geoprobe soil borings around the outside of the building, soil borings inside of the building through the concrete floor, soil characterization of each of the cores, soil samples, and water samples. The investigation verified and confirmed the presence of floating oil on the groundwater interface, resulting in the release of oil to Turkey Brook. Refer to the report entitled *Removal Program Preliminary Assessment /Site Investigation for Turkey Brook Site, Oakville, CT* dated February 2014.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On August 31, 2012 a sheen was reported in Turkey Brook, in an area which is located between two manufacturing facilities. To the east of Turkey Brook is Quality Automatics and to the west is Rintec Corporation. The sheen was reported to the Connecticut Department of Energy and Environmental Protection (CTDEEP). The CTDEEP sent a responder to the scene to gather more information and investigate the potential source of the spill. Upon arrival at the scene, the CTDEEP deployed absorbent boom to mitigate further impact from the spill. The CTDEEP responder and the CTDEEP Site Assessment and Support Unit performed a subsurface investigation to determine the source of the oil released. They were able to confirm that the oil released was coming from oil floating on top of the groundwater which was migrating from underneath the building occupied by Quality Automatics at 20 McLennan Drive, making the operator of this facility the Potentially Responsible Party (PRP). Following the subsurface investigation, CTDEEP met with the owner of the business and toured the facility to observe operations. While observing the operations at the facility, a 55 gallon drum was knocked over by an employee. The employees promptly cleaned up the spill by sweeping the oil into a corner of the building then proceeded to apply speedi-dry. The CTDEEP representative expressed concern regarding their clean up procedures and investigated the area where the oil and oily debris was stored. The CTDEEP representative noticed a gap between the floor and the wall which would provide a pathway for the oil to migrate into the soil and onto the groundwater. It was determined that this clean up procedure had been in place for a length of time and that the amount of oil that had been released over time was unknown. In addition to the questionable clean up procedures, the operations and oil storage in the area appeared to be contributing to the problem via a cracked oil hose that was leaking product onto the floor in this same area. The owner of Quality Automatics assumed responsibility for the release and agreed to implement clean up and remediation actions with CTDEEP providing agency oversight.

On October 9, 2012, the PRP contacted the CTDEEP, notifying them that they were financial unable to continue clean up actions at the site. CTDEEP reported to the site, noticed a visible sheen on the water, and called the National Response Center to report the incident. CTDEEP assumed control of the response and proceeded with boom deployment and associated clean up actions. Clean up actions consisted of continual replacement of absorbent boom in three locations on Turkey Brook and the installation of an oil recovery system. The oil recovery system includes two wells with an oil sensor and a pump which pumps oil off of the surface of the groundwater when the sensor is triggered. This system collected approximately 250 gallons of oil which is currently being stored in a secure location on site in 55 gallon drums.

On July 25, 2013, CTDEEP requested assistance from the US EPA with the source removal actions currently on going at the site. After obtaining signed access agreements from the tenant and the property owner, US EPA and CTDEEP performed a site walk on August 21, 2013. The EPA On Scene Coordinator (OSC) observed a sheen on the water that was being contained by two layers of absorbent boom. The absorbent boom in two of the three deployment areas was completely saturated and potentially contributing to the current sheen. The water level of Turkey Brook was observed to be low, providing a conduit for additional oil to be released from the banks of the brook. The CTDEEP and EPA met with the tenant and property owner where they provided verbal confirmation to have EPA assume responsibility of the clean up actions due to a lack of funds and resources from both the PRP and the CTDEEP. On August 22, 2013, the OSC initiated an emergency action to remediate the visible sheen on Turkey Brook and to prevent further oil from migrating and contaminating areas downstream from the site. On August 23, 2013 the tenant and the property owner signed the Notice of Federal Assumption of Responsibility (NOFAR) which allows EPA to conduct response activities as appropriate to mitigate the actual release and the threat of further release at the site.

2.1.2 Response Actions to Date

(Refer to the previous POLREPS for additional information on activities prior to February 2014.)

On February 20, 2014 EPA and ERRS contractors oversaw the installation of five additional monitoring wells. The wells these wells are located building to attempt better define the extent of subsurface oil and improve recovery volume.

Some petroleum contaminated soils were identified inside the building in wells bored through the concrete floor, but no free product was located. Drilling efforts were limited by boulders and/or bedrock which resulted in drill refusal in several locations at depths of less than 5 feet.

Continuing efforts to remove petroeum from the wells both inside and outside the building with passive skimmers and hand bailers have not been satisfactory. The ERRC contractors have visited the Site every two weeks and have removed only a few gallons in total from the wells.

The OSC has requested support from the EPA ERT in Edison, NJ. ERT will support the request by evaluating the data collected to date, visiting the Site, and making recommendations in regard to other strategies and technologies to improver collection of oil from the groundwater system.

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

The owner of the property has been identified as a PR, as has the tenant, who owns Quality Automatics, which ha relocated to another building across the street.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Waste Oil	Drum	15	N/A	Reclamation	N/A
Absorbent	Drum	22	N/A	N/A	Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Oil clean up activities may include but are not limited to addressing any visible sheen in Turkey Brook, soil excavation around the building, and investigating alternative technologies such as insitu treatment of the oil in soil and groundwater, or horizontal recovery wells, as determined necessary by the site investigation.

2.2.1.2 Next Steps

Continue to recover oil from current wells and maintain sorbent booms as needed.

2.2.2 Issues

No issues have been identified at this time.

2.3 Logistics Section

N/A

2.4 Finance Section

2.4.1 Narrative

On August 22, 2013, the OSC processed a request to the National Pollution Fund Center (NPFC) through CANAPS for a Federal Project Number (FPN) to initiate the emergency response actions at the site. The NPFC assigned the site FPN# E13104 with an initial ceiling of $30,000.

On September 19, 2013, the OSC processed a request to the NPFC through the Federal Project Officer to continue with on site activities to contain any oil discharged to Turkey Brook and to dispose of the drums containing oil and oil/water mixture, located on the bank of the brook.

On November 14, 2013, OSC Pasquerella submitted the Oil Removal Project Plan to the National Pollution Funds Center with a proposed project ceiling of $500,000 for oil pollution cleanup activities under Sect 311(c) Federal Water Pollution Control Act as ammended by the oil Pollution Act of 1990 (OPA).

On November 15, 2013, the ceiling update for this FPN E13104 was processed by the NPFC.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$250,000.00	$40,752.00	$209,248.00	83.70%
TAT/START	$100,000.00	$68,057.00	$31,943.00	31.94%
Intramural Costs				
USEPA - Direct	$27,073.00	$0.00	$27,073.00	100.00%

USEPA - InDirect	$6,346.00	$0.00	$6,346.00	100.00%
Total Site Costs	$383,419.00	$108,809.00	$274,610.00	71.62%

* 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

The EPA Regional Health and Safety Officer is Anthony Honnellio. A site specific Health and Safety Officer will be the OSC.

2.5.2 Liaison Officer

The OSC will serve as the Liason for all site activities.

2.5.3 Information Officer

Position assignment is still to be determined.

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Connecticut Department of Energy and Environmental Conservation (CTDEEP)

4. Personnel On Site

1 Response Manager
3 Laborers
5 START
2 NERL
1 OSC

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.