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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #16**
Contaminated soil removal and sampling
CUC Rota Power Plant

Songsong, MP
Latitude: 14.1366670 Longitude: 145.1358330

To:
From: OSC Michelle Rogow
Date: 6/21/2015
Reporting Period: 6/3/15 - 6/12/15

1. Introduction

1.1 Background

Site Number:	Z9D9	**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:	5/20/2014	**Start Date:**	5/25/2014
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 addressed the PCB contamination by excavating the contaminated soil and shipping it off-island for disposal in 2013. The CERCLA (PCB) portion of the site was completed in July 2013. This POLREP addresses the OPA portions of the response action, aimed at addressing oil seeping into the ocean.

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.

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. PCB contamination was addressed in 2013, and work was completed by July 2013. Oil releases into the Pacific Ocean are on going from a plume of contamination beneath the CUC Power Plant facility.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Oil has been seeping out along the shoreline along a 400' 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 dissolved and free-phase product.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This mobilization was to address packaging and shipping of petroleum contaminated soils which were excavated as part of the oil interceptor trench construction in 2014. Confirmation sampling of the area where the soil was stockpiled occurred. Oil recovery and oil collection in th trench system was assessed, and sampling of groundwater wells was conducted.

2.1.2 Response Actions to Date

WEDNESDAY June 3, 2015: Personnel on-site: EPA – 1, ERRS – 6: OSC Rogow worked in Saipan to coordinate logistics, permitting and access. ERRS and the OSC met and shipped off baggage to Rota. Later in the day, OSC Rogow and ERRS staff flew to Rota, however, the plane was unable to land and returned to Saipan. After waiting a few hours, the group took off again for Rota, finally arriving and settling in.

THURSDAY June 4, 2015: Personnel on-site: EPA – 1, ERRS – 6: OSC Rogow and the ERRS RM went to DPW to negotiate for the use of their equipment. DPW agreed to the use of their equipment in exchange for diesel. ERRS provided diesel for the equipment (55 gallons) and DPW delivered the equipment (an excavator and front end loader) to the site. The first container was delivered and work began filling boxes with contaminated soil. Sixteen (16) cubic yard boxes were then loaded into the container. OSC Rogow also coordinated with CUC on logistics and schedule for the work, and also requested CUC support for providing diesel for the equipment and to compensate DPW. One container was filled and secured for shipping by the end of the day.

FRIDAY June 5, 2015: Personnel on-site: EPA – 1, ERRS – 6: Work continued on loading soil into boxes. Two containers were filled with sixteen (16) cubic yard boxes and secured for shipment. Two full containers were transported to a temporary location awaiting shipment off island. OSC Rogow coordinated with BECQ staff and retrieved sampling supplies from the BECQ office, which had sustained some damage during Typhoon Dolphin. OSC Rogow coordinated with BECQ staff in Saipan to ship some supplies for groundwater sampling. OSC Rogow corresponded with CUC regarding diesel use and for DPW, and received permission for CUC to provide for the diesel for DPW, as a contribution to the site expenses. DPW filled 4 drums with diesel (220 gallons) from CUC.

SATURDAY June 6, 2015: Personnel on-site: EPA – 1, ERRS – 6: Work continued on loading soil into boxes. The weights on the two containers which had been transferred to the temporary location were notably heavy for the crane, and so it was decided that the rest of the containers could only be filled with fourteen (14) cubic yard boxes. Two containers were filled with 14 boxes and secured for shipment. Two more containers (4 total) were transported to the temporary location. OSC Rogow inventoried sampling supplies and coordinated with START on groundwater sampling event planning.

SUNDAY June 7, 2015: Personnel on-site: EPA – 1, ERRS – 6: day off.

MONDAY June 8, 2015: Personnel on-site: EPA – 1, ERRS – 6: Work continued on loading soil into boxes. Two containers were filled with fourteen (14) cubic yard boxes each and secured for transport. Two more containers (6 total) were transported to the temporary location. OSC Rogow coordinated with BECQ staff regarding delivery of supplies for groundwater sampling. DPW filled 4 drums with diesel (220 gallons, 440 gallons total).

TUESDAY June 9, 2015: Personnel on-site: EPA – 1, ERRS – 6: Work continued on loading soil into boxes. The footprint of the stockpile area was scraped and underlying soils were loaded into boxes. By the end of the day, two containers were filled with twelve (12) cubic yard boxes each and secured for transport. Two more containers (8 total) were transported to the temporary location. START arrived on island and visited the site to review activities for the following days.

WEDNESDAY June 10, 2015: Personnel on-site: EPA – 1, ERRS – 6, START - 1: START arrived on site and retrieved supplies that had come in that morning. ERRS began to organize supplies and pack a 20' shipping container of excess supplies for transport to Saipan. Supplies which had been stored at DEQ/BECQ were removed and most were loaded into the container to be shipped back to Saipan. In the afternoon, work began on sampling of the groundwater wells, with 3 groundwater wells sampled by the end of the day. ERRS conducted additional repairs on the transformer secondary containment area. Once the supply container was loaded, the loader was deconn'd and DPW came to the site to retrieve it.

THURSDAY June 11, 2015: Personnel on-site: EPA – 1, ERRS – 6, START - 1: START conducted confirmation sampling of the area underneath the stockpiles were sampled, and then sandbags were dumped into that area. Sampling and test pits of the beach were conducted, with some areas showing evidence of sheen, and others still having a considerable amount of oil seeping into the ocean from along the shoreline. In the afternoon, the remaining 2 groundwater wells were sampled. Supplies in the container to remain on site were organized and inventoried.

FRIDAY June 12, 2015: Personnel on-site: EPA – 1, ERRS – 6, START - 1: Personnel worked on demobilization and shipping of equipment and gear to Saipan from Rota. OSC Rogow and ERRS RM visited DPW to coordinate on use of equipment and final paperwork. OSC Rogow and ERRS demobed to Rota on a Star Marianas charter flight, while START demobed on the Start Marianas early evening flight. ERRS and START retrieved the bags later in the day, when the cargo flight arrived.

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

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
petroleum contaminated	soils	111 cubic yards	014552670JJK, 014552671JJK, 014552672JJK, 014552673JJK, 014552674JJK, 014552678JJK, 014552682JJK, 014552681JJK		

2.2 Planning Section

2.2.1 Anticipated Activities

Soil, which has been packed into 8 containers awaits transportation to the US mainland.

2.2.1.1 Planned Response Activities

Assessment of the sumps and groundwater wells will continue into the future, with oil collection as needed.

2.2.1.2 Next Steps

Track soil headed for disposal. Assess groundwater data when it arrives. Compile reports.

2.2.2 Issues

The transport vessel from Rota to Guam has been canceled and postponed. They attempt to come in once every two weeks, but cancel often. This time of year has the highest probability for vessel transport.

2.3 Logistics Section

When vessels will return is unknown.

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 - 5
APEC - 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.