

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
GC Quality Lubricants - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Progress Report
GC Quality Lubricants
Z4ZM
Macon, GA
Latitude: 32.8212430 Longitude: -83.6335270

To: James Webster, USEPA R4 ERRB
Thomas McCrossen, US Coast Guard

From: Terrence Byrd, On-Scene Coordinator

Date: 9/28/2015

Reporting Period: 09/14/2015 - 09/27/2015

1. Introduction

1.1 Background

Site Number:	Z4ZM	Contract Number:	
D.O. Number:		Action Memo Date:	8/5/2014
Response Authority:	OPA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/24/2015	Start Date:	3/24/2015
Demob Date:		Completion Date:	
CERCLIS ID:	00022091	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E15412	Reimbursable Account #:	

1.1.1 Incident Category

Removal Assessment

1.1.2 Site Description

The Georgia Department of Natural Resources (GaDNR) requested the assistance of the Environmental Protection Agency (EPA) Region 4 Emergency Response and Removal Branch (ERRB) after an inspection resulting from a citizen's complaint of abandoned oily and leaky drums left unattended at the location. GC Quality Lubricants (also known as Georgia-Carolina Quality Lubricants,) is a subsidiary of Bay Street Corporation. The property is a former oil processing facility and encompasses two buildings located across the street from each other (1403 Sixth Street and 1480 Sixth Street). Both buildings are unsecure, open to the environment, and surrounded by heavy vegetation. The property appeared to be abandoned and a tax search revealed that property taxes have not been paid for the past few years. On December 27, 2012, GaDNR performed a site inspection noted numerous violations of the following statutes: 40 CFR Section 262.11, "Hazardous Waste Determination", 40 CFR Section 279.22(c)(1) "Used Oil Storage Generator Facilities", and 40 CFR Section 279.22(d)(1-3) "Used Oil Storage" Response to Releases. The facility is permanently closed, however drums, oil and oily waste material remain at the location.

GC Quality Lubricants is an onshore facility as defined in 40 CFR Section 112 and due to its location, could reasonably be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines. The total storage capacity of the facility exceeds 1,320 gallons of oil and is subject to the preparation and implementation of Spill Prevention Control and Countermeasures (SPCC) Plan. According to a record of bankruptcy proceedings, in the late 1190's or early 2000's, a previous removal action was undertaken by the EPA after a routine SPCC inspection. This inspection uncovered numerous violations of the Oil Pollution Act (OPA), including oil flowing from the facility into a storm drain which exited into a wetland that flows to the Ocmulgee River. An EPA time-critical removal activities was undertaken which included installing sheet piling around the contaminated site and placing a clay cap over the surface of the contaminated area. The total costs of this removal activity was approximately \$2.6 million.

1.1.2.1 Location

GC Quality Lubricants is located on Sixth Street in the city center of Macon, Bibb County, Georgia. It is less than one mile southeast of Mercer University. It also sits less than ½ mile from a wetland which is in the floodplain of the Ocmulgee River, a navigable water of the United States. The main channel of the river

flows 1.4 miles northeast of the former facility. There are numerous lakes and creeks that connect the floodplain to the river and it is not uncommon for the wetland to fill with water during heavy rainfall. The surrounding area is mostly industrial, with a rail yard located to the southeast.

1.1.2.2 Description of Threat

GC Quality Lubricants is a facility that has had and continues to have a discharge of oil or a substantial threat of a discharge of oil into or upon the navigable waters or adjoining shorelines of the United States. The following threats to public health or welfare are noted:

Section 300.415 (b)(2)(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems. The facility is located less than ½ mile from a wetland which is in the floodplain of the Ocmulgee River, a navigable water of the United States. The main channel of the river flows 1.4 miles northeast of the former facility. There are numerous lakes and creeks that connect the floodplain to the river and it is not uncommon for the wetland to fill with water during heavy rainfall. Oil stained soil is visible around the building. The source of the contaminated soil can be attributed to oil emanating from the facility.

Section 300.415 (b)(2)(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers, that may pose a threat of release. In the building located at 1403 Sixth Street, approximately fifteen 55-gallon drums and five 5-gallon buckets were visible in the building. There are additional drums located on the second floor at the rear of the warehouse. In the building located at 1414 Sixth Street, numerous drums labeled "oil w/water", "used dirt", and Chevron Petrolatum Snow White". Are present. Oil soaked rags, used absorbent boom and empty 5 gallon buckets litter the floor. The floor of the building was also covered with oil. A 10,000 gallon tank with secondary containment is located near the front of the building. The contents of the tank could not be determined, but the secondary containment was filled with approximately 5,000 gallons of oil. The buildings are not secure and parts of them are exposed to weather and rotting.

Section 300.415 (b)(2)(vi) Threat of fire or explosion. Both buildings are covered with oil. Lightning and thunderstorms are very common in this area. A lightning strike to either of these buildings could cause a major fire.

Section 300.415 (b)(2)(vii) The availability of other appropriate federal or state response mechanisms to respond to the release. The site was referred to the EPA due to its inability to perform cleanup activities. The OSC knows of no other federal or state response mechanisms to respond to the release.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In response to a request from GaDNR, the EPA Region 4 ERRB performed a removal site evaluation at the former GC Quality Lubricants in Macon, Bibb County, Ga. Prior to traveling to the facility, OSC Terrence Byrd attempted to contact the property owner via phone to gather more information and obtain written access to enter the property. OSC Byrd also contacted Marvin Woods from the GaDNR Hazardous Waste Management Program to obtain updated information on the status of the property and its ownership. Unable to contact the property owner listed on file (the owner of record is suspected to be deceased) or gather additional information from any other sources, OSC Byrd proceeded to the facility to look for signs of discharge to the environment. Upon reaching the facility, OSC Byrd observed heavy vegetation surrounding both buildings. After parking on the left side of the main office, OSC Byrd proceeded to the front entrance. The doors of the main office were unsecured and open. Trash, office supplies, old files, etc. were strewn throughout the floor. OSC Byrd then walked around the perimeter of the property and witnessed an open area, presumed to have been used for loading and unloading at the warehouse located behind the main office. The floor of the warehouse area is covered with oil; pipets and other lab supplies lay throughout the building. Pursuant to the criteria established by 40 CFR Section 300.400(d)(1)(A)(B) and (C), OSC Byrd entered the facility to investigate further. Approximately fifteen 55-gallon drums and five 5-gallon buckets were visible in the building. There are additional drums located on the second floor at the rear of the warehouse. The second floor is open to the environment and the supporting structure is broken and rotting. The second building was locked and secure from the front but is open and accessible from the side. Oil-stained soil was present at the side opening. Oil stained soil was also present at areas on the side of the building. The staining seemed to be the result of oil flowing from the floor of the interior of the structure. Upon entering the second building, OSC Byrd observed numerous drums labeled "oil w/ water", "used dirt", and Chevron Petrolatum Snow White". Oil soaked rags, used absorbent boom and empty 5 gallon buckets litter the floor. The floor of the building was also covered with oil. A 10,000 gallon tank with secondary containment is located near the front of the building. The contents of the tank could not be determined, but the secondary containment was filled with approximately 5,000 gallons of oil/water.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Site mobilization took place on 09/14/2015. ERRS Crews performed preliminary moving and landscaping around the areas of both 1403 and 1480 6th St due to heavy vegetation. One access to the buildings were attained, the ERRS Crew began removal of oil and oily debris in the buildings by applying absorbent to the floor and then gathering it with heavy machinery. As of 09/27/2015, 5 pallets of oil absorbent has been used. However, after the floors were cleaned, oil began would continuously, slowly seep to the surface of the floor.

Sheet piling also was noticed around the perimeter of both buildings, indicating previous removal activity. The environmental contractor that performed the work was contacted and stated that oil is saturated in soil to depths of around 30 feet in various areas of the Site. OSC Byrd directed START to take soil samples near the sheet pilings to ensure that oil had not breached the established perimeter.

Transportation and disposal of waste is expected to begin on 09/28/2015.

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

The owner of the defunct company has been identified and contacted.

2.2 Planning Section

2.2.1 Anticipated Activities

ERRS will continue to remove oil and oily residue at the Site. START is preparing the samples obtained in order that have them analyzed at the lab.

2.2.1.1 Planned Response Activities

Soil removal may become necessary if samples indicate that oil has migrated past the sheet pilings toward the nearby wetland.

2.2.1.2 Next Steps

2.2.2 Issues

While performing an OPA Removal Action at the Site, OSC Byrd encountered numerous abandoned chemical drums and bottles from a suspected on site Lab. As of 09/28/2015, nine 55 gallon drums have been encountered and numerous pipets and glass bottles are strewn among papers in the building. OSC Byrd has initiated a ER utilizing the allocated \$250,000 statutory warrant authority to address the contaminants.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

Due to unexpected costs of sampling and analysis, OSC expects that additional funding will be needed for this response.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$190,000.00	\$115,000.00	\$75,000.00	39.47%
TAT/START	\$19,000.00	\$16,000.00	\$3,000.00	15.79%
Intramural Costs				
USEPA - Direct	\$21,000.00	\$2,000.00	\$19,000.00	90.48%
USEPA - InDirect	\$5,000.00	\$0.00	\$5,000.00	100.00%
Total Site Costs	\$235,000.00	\$133,000.00	\$102,000.00	43.40%

* 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

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 #3 Last Updated 5/9/2016