

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #6
Initiation of Removal Activities at Bay Street Building
GC Quality Lubricants
Z4ZM
Macon, GA
Latitude: 32.8212430 Longitude: -83.6335270

To:
From: Matthew J. Huyser, On-Scene Coordinator
Date: 10/5/2016
Reporting Period: 10/3/2016 to 10/5/2016

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

Time-Critical Removal Action

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. 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 three buildings; two are located across the street from each other at 1403 Sixth Street and 1480 Sixth Street, and the third building is located at 195 Bay Street. All of the 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 remained 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 1990'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 has locations across the street from each other located on Sixth Street and at 195 Bay Street. 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

See POLREP #5 dated June 20, 2016.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #5 dated June 20, 2016.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA On-Scene Coordinator (OSC) Huyser arrived with ERRS Contractor, Kemron, on October 3, 2016, to the GC Quality Lubricants Building at 195 Bay Street. Initial activities from October 3 to October 5 focused site preparation work including trailer and power setup, vegetation clearing, and installation of several safety controls in the building including railings and tread tape.

START contractor, OTIE, arrived at the Site on October 4. OSC Huyser initially tasked START with collecting samples of bulk suspected asbestos-containing material (ACM) which was on the floor of the building in areas where ERRS crews would be cleaning first. START began preparing a drum and container inventory of the building on October 5.

OSC Huyser notified the Macon Bibb County Emergency Management Agency (EMA) Director of EPA's activities at the Site and provided contact information for EPA OSCs Huyser and Byrd. On October 3 a representative from the Macon Bibb County Building Development Services Department visited the Site and stated that the department had standing requirements for the building which had not been resolved with the property owner. These requirements will not interfere with EPA's work at the Site.

2.1.2 Response Actions to Date

Removal Activities Completed at 195 Bay Street:

- Cleared and setup facilities within the support zone and staging area
- Initiated drum inventory, room 1B complete

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

See POLREP #5 dated June 20, 2016.

2.2 Planning Section

2.2.1 Anticipated Activities

The building located at 195 Bay St has petroleum that is discharging to the environment and remediation is needed.

2.2.1.1 Planned Response Activities

Actions for 195 Bay Street Location:

1. Install safety controls within building work spaces (ONGOING);
2. Sample and/or monitor working spaces to establish site-specific safe working conditions and practices;
3. Cut or install access pathways for removal of drums and other containers from building;
4. Inventory, sample, and categorize drums and other waste containers (ONGOING);
5. Remove spilled oil, grease, and petroleum products from the building;
6. Remove drums and other containers from the building; and,
7. Dispose of oil, grease, petroleum products, and oil-contaminated debris.

2.2.1.2 Next Steps

Equipment was mobilized to begin construction of an access ramp on the south end of the building into the ground floor. One window sill will be cut to floor-level to facilitate removal of drums and other waste containers from each floor. Cut windows will occur in the same vertical space on the south end of the building.

2.2.2 Issues

If disturbed and friable asbestos is identified in proposed work areas, applicable and appropriate safety precautions will be implemented.

OSC Huyser and ERRS contracted the engineer who prepared the structural report for the building at EPA's request to discuss shoring tower installation processes and the elevator shaft. The Engineer has preliminarily agreed that shoring tower installation for each floor is intended to support work activities on the

floor above. This means that the floor cleaning can proceed beginning with the lowest floor first without shoring tower installation work, then work on the next level can begin after shoring towers are installed in the recently cleaned floor. This process eliminates the safety concerns of erecting towers while surrounded by spilled oil and contaminated debris. Additionally, the engineer will return to the site to advise on securing the open freight elevator which has seized between floors and is a hazard if it were to shift or fall.

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

EPA (1)
ERRS Kemron (4)
START OTIE (1)

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information pertaining to both the Sixth Street buildings and the Bay Street building can be found in the documents section of the Site webpage at www.epaosc.org/GCQuality

6.2 Reporting Schedule

POLREPS will be generated weekly or bi-weekly

7. Situational Reference Materials

No information available at this time.