

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Unknown Pipeline - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial/Final
Unknown Pipeline
Z5QE
Lodi, OH
Latitude: 41.0436430 Longitude: -82.0034170

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From: Stephen Wolfe, On-Scene Coordinator

Date: 10/25/2016

Reporting Period: 09/23/16 through 10/25/16

1. Introduction

1.1 Background

Site Number:	Z5QE	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/23/2016	Start Date:	9/23/2016
Demob Date:	10/25/2016	Completion Date:	10/25/2016
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	yes
FPN#:	E16503	Reimbursable Account #:	

1.1.1 Incident Category

Abandoned oil pipeline (leaking)

1.1.2 Site Description

1.1.2.1 Location

The Unknown Pipeline Site is located at a residential property in Lodi, Medina County, Ohio (GPS Coordinates 41.045157 degrees north and 82.005163 degrees west). The pipeline crosses a residential property and intersects a creek that runs across the front of the property, parallel to the road. The creek is a tributary to the Black River. The pipeline transects approximately 600 feet of the residential property.

The pipeline was installed in the early 1900s and went through several different ownerships. The pipeline was used to

transport petroleum products from Lodi, Ohio to Killbuck, Ohio (approximately 40 miles). The pipeline was last sold in the 1990s to a company for scrapping purposes; however, the purchasing company did not remove the pipeline. The site of the release was is an open field on a residential property (horse farm). According to the property owner, there is no information in the property deeds that indicate that a pipeline crosses the property.

1.1.2.2 Description of Threat

In June 2015, Ohio EPA responded to a release of oil to a creek. The source was discovered to be a six-inch pipeline that crossed a small creek in the front of a residential yard. Ohio EPA placed a clamp on the leak, removed free oil from the creek, and excavated contaminated soil for disposal. The site was referred to EPA as the clamp was a temporary fix. In July 2016 a second leak occurred at the same location and Ohio EPA responded and controlled the situation with another clamp. Available records indicated the pipeline was abandoned in the 1990s. Since efforts to locate the current owners of the pipeline were unsuccessful, and two leaks occurred at the same location, EPA began planning for an emergency removal action.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Ohio EPA controlled two leaks in the pipeline with clamps and remediated contaminated soil (June 2015 and July 2016). A four-inch line was discovered running parallel to the six-inch line and was partly above ground in a deteriorated state. Both lines crossed a small creek (the four-inch line was completely under water) and both leaks occurred in the six-inch line at the crossing point.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On August 24, 2016, ERRS and their pipeline subcontractor were on site to inspect the six-inch pipe and its suitability for "hot tapping" (drilling a hole through an installed valve). The pipeline subcontractor also inspected the four-inch pipeline where visible and concluded that the line was too deteriorated to attempt any work at this time.

On September 23, 2016, ERRS and their subcontractor arrived on site to "hot tap" the six inch pipeline. Two locations of the pipe were tapped, one location for draining purposes and one location as a vent. The four-inch pipeline was uncovered in several different locations and the pipeline subcontractor agreed to perform a hot tap on the smaller pipeline at a later date as the line appeared solid in the uncovered locations. After the taps were installed on the six-inch pipeline, oil samples were collected for disposal analysis.

On October 11, 2016, ERRS returned to the site to begin removing oil from the pipelines. The four-inch pipeline was excavated to prepare the line for hot tapping later in the week. Oil was drained from the six-inch pipeline using a vacuum truck.

On October 12, 2016, ERRS returned to the site to finish emptying the six-inch line. After no material was visible in the vent tap, the vacuum was removed from the line and the six-inch line was cut at an up-gradient location for capping and removal. The six-inch line was permanently capped (leading up-gradient from the property).

On October 13, 2016, a subcontractor for ERRS returned to the site to install hot taps on the 4-inch line. After the hot taps were installed, ERRS removed material from the pipeline using a vacuum truck. Once material no longer emptied from the 4-inch line, the vacuum was turned off and the 4-inch pipeline was cut and capped on the up-gradient portion of the pipe.

On October 14, 2016, leaks were observed on the 4-inch line near the down gradient tap location. Water was coming out of several holes that were not observed the day before. It was assumed that the water was infiltrating the pipeline from the creek; therefore, the 4-inch line was cut past the location where it crossed the creek and capped. All water leaking from the pipe was removed with the vacuum truck due to oil contamination, and the pipe was emptied again. The portion of the 4-inch pipeline was removed that crossed the creek and numerous holes were visible in the pipe. Before departing for the evening, additional holes were observed in the 4 inch pipeline down-gradient from the creek and the decision was made to remove additional lengths of pipe to ensure water did not infiltrate the pipe, become contaminated with residual oil, and leak from the pipe.

Five totes (1,650 gallons) of petroleum material were transported from the site for disposal at EQ Detroit, located in Detroit, Michigan.

On October 15, 2016, ERRS removed approximately 150 feet of the 4-inch pipeline (south of the bridge that crosses the creek) and permanently capped both ends of the pipeline that was left in place.

on October 17, 2016, ERRS removed the tap from the 6-inch line in the south field. Plugs were placed in the line and the line was clamped to seal the "tap" hole. The 6-inch line could not be cut in this location as the pipeline was located very close to the ground surface and any plugs installed on the end would stick above the ground surface and endanger the horses that use the field.

From October 17 through October 19, 2016, ERRS cut approximately 200 feet of the 6-inch pipeline and 4-inch pipeline into 8 foot sections. The inside of the pipe sections were cleaned by pushing sorbent pads through and collecting any material in a drum. The excavated areas were backfilled and graded for restoration. On October 18, 2016, 3 totes (990 gallons) of petroleum material and 2 drums of pads were taken to EQ Detroit, located in Detroit Michigan for disposal.

On October 19, 2016, 2 drums of sorbent pads and boom were taken to EQ Detroit, located in Detroit Michigan for disposal.

On October 24, 2016 the roll-off box containing the pipe and miscellaneous debris was removed from site and taken to American Landfill, Waynesburg, Ohio for disposal. An ERRS subcontractor was on-site to perform final restoration

(grading/topsoil/seeding).

On October 25, 2016, final restoration was completed and ERRS demobilized from the site.

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

The current owners of the pipelines has been identified; however, efforts to locate them have been unsuccessful. Information requests as well as Notices of Federal Interest/Assumption were mailed to available addresses and all were returned unopened.

A Previous owner of the pipeline provided information to the EPA that indicated portions of the pipeline was removed in the 1990s approximately 1 mile away from the leak location.

2.1.4.1 Regional Metrics

Regional Metrics

	Miles of river systems cleaned and/or restored	NA
This is an Integrated River Assessment. The numbers should overlap.	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	2,640
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
	Number of workers on site	4
Contaminant(s) of Concern	Petroleum	

Oil Response Tracking

Estimated volume	Initial amount released	unknown
	Final amount collected	2,640 gallons
	FPN Ceiling Amount	\$185,000
CANAPS Info	FPN Number	E16503
	Body of Water affected	Black River

Administrative and Logistical Factors (Place X where applicable)

Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	X Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
Criminal Charges Have Been Filed*	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year	Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	NA	gallons
Unleaded Fuel Used	NA	gallons
Alternative/E-85 Fuel Used	NA	gallons
Electricity from electric company	NA	kWh
Electric Company Name and Account #	NA	
Electricity from sources other than the electric company	NA	kWh
Solid waste reused	NA	
Solid waste recycled	NA	
Water Used	NA	gallons

2.1.4.2 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Petroleum material	liquid	2,640 gallons	014109727JJK 014109714JJK		EQ Detroit, Detroit, Michigan

Pipe/debris	solid	500 feet	353689		American Landfill, Waynesburg, Ohio
miscellaneous pads/boom	solid	4 drums	014109714JJK 014109728JJK		EQ Detroit, Detroit, Michigan

2.2 Planning Section

2.2.1 Anticipated Activities

None- Response Complete

2.2.1.1 Planned Response Activities

None- Response Complete

2.2.1.2 Next Steps

None- Response Complete

2.2.2 Issues

ERRS planned to use pressurized nitrogen to force material through the pipe for cleaning (known as 'pigging") however the equipment malfunctioned and the removed pipe had to be cleaned out manually.

Additional holes in the 4-inch pipeline were discovered resulting in additional contaminated water that had to be disposed of and an additional ~150 feet of pipe that had to be removed that was unanticipated

2.3 Logistics Section

ERRS coordinated logistics for the site

2.4 Finance Section

2.4.1 Narrative

FPN E16503 was opened with the USCG Oil Spill Liability Trust Fund to cover response costs. As the response actions continued, several ceiling requests were made and granted to complete the removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$130,000.00	\$120,000.00	\$10,000.00	7.69%
Intramural Costs				
USEPA - Direct	\$30,000.00	\$15,000.00	\$15,000.00	50.00%
USEPA - InDirect	\$25,000.00	\$19,500.00	\$5,500.00	22.00%
Total Site Costs				
	\$185,000.00	\$154,500.00	\$30,500.00	16.49%

* 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 OSC and ERRS RM is fulfilling this Role.

daily safety meetings were held prior to the start of each days work and additional briefings were held as necessary when hazardous work was conducted (pipe cutting, pigging (pressurized gas) etc.

2.5.2 Liaison Officer

NA

2.5.3 Information Officer

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

Ohio EPA originally responded to the leaking pipeline (June 2015 and July 2016). EPA completed the response actions and kept the Ohio EPA informed of actions.

4. Personnel On Site

EPA OSC (1)

ERRS (4)

subcontractors (2)

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 #1 Last Updated 9/8/2021