

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #9
Progress
GC Quality Lubricants
Z4ZM
Macon, GA
Latitude: 32.8212430 Longitude: -83.6335270

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

From: David Andrews, On-Scene Coordinator

Date: 11/3/2016

Reporting Period:

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 Environmental Protection Division (GAEPD) requested the assistance of the Environmental Protection Agency (EPA) Region 4 Emergency Response, Removal and Prevention Branch (ERRPB) 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, the third building is located at 195 Bay Street in Macon, Bibb County, Georgia. All of the buildings are unsecure, open to the environment, surrounded by heavy vegetation, and with evidence of trespassing/vandalism. The property appeared to be abandoned. A tax search revealed that taxes have not been paid for the past few years. On December 27, 2012, GAEPD performed a site inspection and documented 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(s).

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. The 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 action at the facility 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

Emergency Rapid Response Service (ERRS) completed clearing the basement of the building of drummed oil/lubricants (81-drums & 100 < 1 gallon small containers), gross floor contamination of spilled oil, and miscellaneous contaminated debris. Installation of shoring structures in the basement to support the upper first floor was also completed. Work begun on the first floor to remove gross contamination and spillage of oil from the floor and begin installation of shoring structures to support the upper 2nd floor. One 30 cubic yard roll-off of oil contaminated debris & trash was shipped off-site for disposal. The Superfund Technical Assessment and Response Team (START) continues to refine the container inventory and categorize, via field compatibility testing, disposal groups for bulk disposal.

2.1.2 Response Actions to Date

Week of October 10 - 14, 2016:

Reconnaissance/ expanded assessment of 195 Bay Street completed.

Ceiling tiles and associated structural materials sampled for asbestos analysis.

*** Sample results show no evidence of asbestos in sampled materials ***

Construction of an access ramp into the south end of the building (basement) has been completed.

- Drum inventory Complete

Basement

- 47 – 55 gallon drums
- 36 – 20 gallon drums
- 10 – 5 gallon buckets
- 12 – 1 gallon containers
- 1 – 30 gallon cardboard fiber drum with crystals (pH 10-11).
- 1 – 30 gallon cardboard fiber drum labeled "Koppers DBFC Flakes" about 1/8 full.

1st Floor –

- 53 – 55 gallon drums
- 158 – 20 gallon drums
- 53 – 5 gallon buckets
- 2 – 1 gallon containers
- 1 – overpack drum
- 1 – 30 pound cardboard fiber drum

2nd Floor –

- 73 – 55 gallon drums

3rd Floor –

- 69 – 55 gallon drums
- 10 – 20 gallon drums
- 2 – 5 gallon buckets

Grand totals (529 total containers)

- 242 – 55 gallon drums

- 204 – 20 gallon drums
- 65 – 5 gallon buckets
- 14 – 1 gallon containers
- 3 – 30 gallon cardboard fiber drums
- 1 – overpack drum

October 24 - 28, 2016:

- 83 drummed containers of product have been removed from the building.
- 24-cubic yards of oil stained debris and sorbent materials have been consolidated into a roll-off box in this reporting period.
- Two shoring platforms were installed on the basement level to support designated areas of the first floor.
- 29 samples field tested for materials compatibility and disposal coordination.
- Power line installed on site and in-service.

October 31- November 4, 2016:

- Basement cleared (5 rooms/zones A thru E) . A few containers remain that will require special handling and will remain in-place until time of off-site shipment/disposal.
- Two 6'X6' and seven 4'X4' shoring structures installed in Basement Zone "GB" and one 4'X4' shoring structure installed in Basement Zone "GC". These structures are to assure stability of the first floor operations.
- First Floor Zone 1E cleared of free standing oil & contaminated debris. Containers staged to south corner of the room.
- First Floor Zone 1E two 4'X 4' shoring structures installed.
- 2 X 30 cubic yard roll-offs of oil contaminated trash, debris and sorbent material shipped off-site for disposal.
- 41 drums tested for bulk compatibility & profiled for disposal. 81 drums profiled to date.

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 indicated.

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 (ONGOING);
4. Inventory, sample, and categorize drums and other waste containers (ONGOING);
5. Remove spilled oil, grease, and petroleum products from the building (ONGOING);
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

The first floor will be cleaned of oil, grease & contaminated debris and shoring structures to support the second floor will be installed. Contractors will begin to remove containers to the staging area located outside at the northeast corner of the building.

2.2.2 Issues

Heavy contamination of the building's floor space with caked-on oil & debris (trash, pallets & overturned drums) are the primary impediments to an expeditious clean-up process. Workers continue to maintain work practices to assure safe effective daily production.

2.3 Logistics Section

This position is served by the FOSC

2.4 Finance Section

2.4.1 Narrative

The Bay St. Facility is a large abandoned structure. There is a very large number of abandoned drums of oil located in and around the property as well as oily rags and debris. The current amount of funding in the current ceiling will not fully fund an adequate remediation effort. Therefore an increase in funding of \$350,000 has been requested and approved.

Site: 0017-EPS41505 GC Quality Lubricants

Contractor: KEMRON

Contract #: EP-S4-15-05

Delivery Order #: SF1417 (\$180,000.00)

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$180,000.00	\$142,499.44	\$37,500.56	20.83%
TAT/START	\$127,270.00	\$65,362.00	\$61,908.00	48.64%
Intramural Costs				
USEPA - Direct	\$46,410.00	\$3,848.00	\$42,562.00	91.71%
USEPA - InDirect	\$33,480.00	\$14,446.00	\$19,034.00	56.85%
Total Site Costs				
	\$387,160.00	\$226,155.44	\$161,004.56	41.59%

* 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

This position is served by the FOSC

2.5.2 Liaison Officer

This position is served by the FOSC

2.5.3 Information Officer

This position is served by the FOSC

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

GAEPD

4. Personnel On Site

EPA (1 FOSC)

ERRS Kemron; (8 personnel) 1-Response Manager, 1-Field Clerk, 1-Foreman, 1-Equip Operator, 4 Laborers

START OTIE (1 Environmental Scientist)

5. Definition of Terms

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ACM – Asbestos Containing Material or Substances

Asbestos - Refers to a set of six naturally occurring fibrous minerals. Asbestos has six primary sub-classifications: chrysotile, crocidolite, amosite, anthophyllite, tremolite, and actinolite. Among these, chrysotile and amosite asbestos are the most common.

CANAPS - Ceiling And Numbering Assignment Processing System

EPA – Environmental Protection Agency Region 4

ERRPB – Emergency Response, Removal and Prevention Branch (formerly ERRB)

ER – Emergency Response

ERRS – Emergency Rapid Response Service (Kemron, Inc)

f/cc – Fibers per cubic centimeter

FPN - Federal Project Number

GAEPD - Georgia Environmental Protection Division

NPFC - National Pollution Fund Center

OIL – (Regulatory Definitions)

- Petroleum oils—include crude and refined petroleum products, asphalt, gasoline, fuel oils, naphtha, sludge, oil refuse, and oils mixed with waste other than dredged spoils.
- Nonpetroleum oils and greases—include coal tar, creosote, silicon fluids, pine oil, turpentine, and tar oils.
- Synthetic oils (oils created by chemical synthesis)—include heat transfer and engine fluids, hydraulic and transmission fluids, metalworking and dielectric fluids, and compressor and turbine lubricants.
- Animal fats and vegetable oils (AFVO)—include fats, oils and grease from animals, fish or marine mammals, and vegetable oils from seeds, nuts, fruits, or kernels.
- Asphalt—includes asphalt cement and derivatives, such as cutbacks and emulsions. The definition *does not* include hot-mix asphalt (HMA) and HMA containers as by its nature, HMA is unlikely to have the ability to flow into navigable waters or shorelines.
- Natural gas—includes natural gas liquid condensate (sometimes called “natural gasoline” or “drip gas).” The rule *does not* include either liquid natural gas or liquid petroleum gas because they volatilize on contact with air or water.
- Oil and water mixtures—includes mixtures of waste water and oil and produced waters containing oil from an oil production, recycling, or recovery facility. The EPA also notes that produced water is also not eligible for the waste water treatment exemption in Part 112.1(d)(6).
- Hazardous substances and hazardous waste—includes “certain hazardous substances or hazardous wastes that are oils, as well as certain hazardous substances or hazardous wastes that are mixed with oils.” Also included are underground storage tanks at facilities subject to the SPCC rule that hold Resource Conservation and Recovery Act (RCRA) hazardous wastes containing oils. Hazardous wastes that are not oils or are not mixed with oils *are not* included under the SPCC rule.
- The SPCC definition of oil is taken from the Clean Water Act: *“Oil of any kind in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil.”*

OSC – Federal On-Scene Coordinator

PRP – Potential Responsible Party

RML – Regional Removal Management Level

RSE – Removal Site Evaluation

SPCC – Spill Prevention, Control & Countermeasure - The purpose of the Spill Prevention, Control, and Countermeasure rule is to help facilities prevent a discharge of oil into navigable waters or adjoining shorelines. This rule is part of the

U.S. Environmental Protection Agency’s oil spill prevention program and may be found at Title 40, Code of Federal Regulations, Part 112.

SOSC – State On-Scene Coordinator

START – Superfund Technical Assessment and Response Team (OTIE, Inc)

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

POLREP #9 Last Updated 11/4/2016