United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Wednesday, December 14, 2005
From: Jon Gulch

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	Scott Shane, Ohio EPA	Scott Nally, OEPA
	Don Bussey, EPA	Mike Gerber, Ohio EPA
	Kevin Clouse, Ohio EPA	Timothy Murphy, City of Toledo
	U.S. Coast Guard Case Officer, USCG	Alex Tzallas, US EPA

Subject: Continuation of PRP Removal Action
Delta Fuels
1820 Front St, Toledo, OH
Latitude: 41.6586000
Longitude: -83.5047000

POLREP No.:	3	**Site #:**	Z5FG
Reporting Period:	December 6- 13, 2005	**D.O. #:**	
Start Date:	11/29/2005	**Response Authority:**	OPA
Mob Date:	11/29/2005	**Response Type:**	Emergency
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:		**Reimbursable Account #**	
FPN#	E06502		

Site Description
See POLREP #1 for a full description of the Site.

Current Activities
On December 6, EPA START and PRP contractor air monitoring activities continued. Due to the colder weather, vacuum truck operations experienced problems with freezing. Clean soils from the various excavations, as determined by PID, were staged at a location south of the tank farm. Contaminated soils were staged in a designated area between the site office and the tank farm. Geoprobe activities continued to determine extent of the contamination both horizontally and vertically. Second shift activities were limited due to extreme temperatures. The total gallons of product recovered is 13,362 gallons. An inspection of the tank farm occurred to determine how close to the tanks the excavation could occur. Carbon vapor cartridges were installed for the sewer system. Vapors were still present in the sewer system.

On December 7, air monitoring activities continued. The Site Health and Safety Plan (H&S Plan) was updated for additional safety concerns. Confined space entries occurred in the sewer system to assist in video taping the sewer system. The pressurized plug was removed and later reinstalled. Absorbent booms were installed in each manhole to collect any product in the storm water. Excavation around manhole #50 occurred to install a slurry wall around the sewer pipe and into the gravel underbase to prevent any flow of product. Excavations around Manhole #52 and #53 were backfilled with gravel and two recovery wells were installed.

On December 8, a monitoring well was installed near a sewer plug to monitor the sewer at the gravel

underbase. Vacuum trucks continued to remove product and water from the sewer system and the excavations. Air monitoring and GeoProbe activities continued. The excavation of the new water line continued. Two petroleum pipelines were exposed through limited excavations and were inspected for product. There was no product encountered by the pipeline excavations. Product was found in the recovery well at manhole #52. Two additional fractionation tanks were brought to the site to hold water and product recovered from the sewer system and the various excavations. Ground penetrating radar was used to investigate the site for additional underground structures and anomalies. GPS surveying and GIS mapping activities continued.

On December 9, a change in the H&S Plan was made and heavy equipment operators began wearing respirators while excavating in affected areas. Air monitoring and GeoProbe activities continued. Manhole #31, which is closest to the river, was opened to check for product. Product was discovered and a vacuum truck was staged at the manhole to remove product and water. Immediately after, the sewer line was opened and inspected between Manhole #31 and the Maumee River. No product was found in the excavation, which was closed using a slurry wall to provide additional protection of the river from a release. The access road in front of the site was strengthened to provide access to dump trucks and other vehicles to reduce traffic on Front Street. Installation of slurry walls at Manholes #50 and # 48 continued. Collection of product from trenches and the sewer system continued. Excavation of the new water line continued. The EPA-Environmental Response Team (ERT) arrived on-site to provide geological and product recovery expertise.

On December 10, excavation of the old/abandoned water line began; the new water line has been completely removed. Collection of water and product by vacuum truck continued. Surveying and GPS mapping of the site continued. A mobile laboratory mobilized to the site to assist with the data collection and analysis. Concerns about excess water in the storm sewers from snow-melt and rain were discussed in the daily planning meeting. The sewer system has carbon vapor recovery canisters at two locations.

On December 11, collection of product and water by vacuum trucks continued. Execavation of water line continued. Monitoring of the vapors and fluids of manholes continued. GPS's of site features continued. Air monitoring of the site and surrounding neighborhood continues. Soil boring were advanced on both sides of the ramp. Sewer camera data is being evaluated. Vapor cartridge moved from Manhole 51A to manhole 52.

On December 12, the PRP located and opened the remaining down stream manholes for sewer videotaping. Small amounts of vapors were detected in the sewer system. Additional safety signage was installed on-site. Minor amounts of product and water were vacummed from the water-line excavation trench. Backfilling of open excavations occured at Manhole #50 and #48. Recovery/monitoring wells were installed at manhole #50, upstream of the slurry wall excavation. Use of a vacuum trucks to empty storm sewers of water and trenches of liquids continues. Air purging of storm sewers continues, with carbon vapor recovery canisters located at two manholes, manhole #52 and #54. EPA began split sampling of ramp samples for confirmation; one set was sent to the on-site lab, while a second set will be sent to an off-site START procurred laboratory where 10% will be analyzed. The contaminated soil pile was surveyed and a volume of soils for disposal was estimated at 3,000 cubic yards. Requests for bids for the disposal of the contaminated soils were made available to various landfills. Borings were placed along the sewer system downstream from the plug at manhole #47 and upstream from manhole #31.

On December 13, additional soils were excavated from manhole #50 to assist with the backfilling of the excavation. The back-filling of the excavation of manhole #48 is completed and the area is returned to level. Stone was added to the backfill at manhole #50 for the installtion of the recovery/monitoring well. Both pipeline execavations are still open for visual monitoring. Sampling along the ODOR entrance ramp using a GeoProbe continues. Aerators were placed in the Maumee River to keep the area around outfall from freezing. Vacuum truck activities continue.

Planned Removal Actions

-Continue GeoProbe activities to determine possible migration pathways and to define extent-of-contamination of the release.

-Continue excavation activities around storm sewer systems to determine contamination migration pathways.

-Continue vacuum truck operations in the storm sewer system and monitor for potential product migration towards the Maumee River.

-Continue excavation and trenching activities to investigate, recover, and remove free product and

contaminated soils.

-Begin discussions on the possibility of a long-term engineered product recovery system.

-Continue discussions with the State of Ohio (adjacent impacted property owner) on clean-up levels.

-Begin the installation of a new dike wall located closer to the tank system and away from the roadbed, water line, and pipeline.

-Begin to install vapor and/or product collection systems around storm sewer manholes.

Next Steps

-The PRP will establish a clay barrier along the ODOT property line to stop migration of product from the facility. This estimated length of the barrier will be 450 feet long by 8-10 feet wide.

-The PRP will excavate the product that has migrated off-site onto the ODOT property (under the ramp construction). The estimated amount of soil removal (contaminated and clean) is approximatley 16,000 cubic yards.

Key Issues

-GPS and GIS operations have been turned over to a contractor working for the PRP.

-On December 11, 2005, the PRP signed a U.S. EPA Removal Administrative Order under Section 311(c) of the Clean Water Act.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2300 gallons	MI 10194023	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882151	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882155	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5000 gallons	MI 9882152	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882154	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 10194029	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 10194026	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5375 gallons	MI 10194028	Usher Oil Service 9000 Roselawn Detroit, MI 48204

Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2550 gallons	MI 10194025	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5100 gallons	MI 9882174	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5400 gallons	MI 9882178	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5000	MI 9528053	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Flammable Liquid, NOS, UN1993 Class 3 (PGI)	400	MI 10194000	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2550 gallons	MI 9882196	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2100 gallons	MI 10027178	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	6000 gallons	MI 9774243	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882195	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5800 gallons	MI 10194054	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5800 gallons	MI 10194041	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	4800 gallons	MI 10194047	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5800 gallons	MI 10194027	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5000 gallons	MI 10194042	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5000 gallons	MI 9882177	Usher Oil Service 9000 Roselawn Detroit, MI 48204

Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 10194037	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	4000 gallons	MI 9882170	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	3000 gallons	MI 9882171	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882173	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5400 gallons	MI 9882175	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882176	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 10194037	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 10194030	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	5400 gallons	MI 9882178	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2500 gallons	MI 9882153	Usher Oil Service 9000 Roselawn Detroit, MI 48204
Gasoline (Recoverable Petroleum Product) 3, UN1203, II	2000 gallons	MI 10026596	Usher Oil Service 9000 Roselawn Detroit, MI 48204