

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Thursday, July 20, 2006

From: Jon Gulch

To:	Sam Borries, U.S. EPA	Jason El-Zein, U.S. EPA
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	Beverly Kush, U.S. EPA	Tom Krueger, U.S. EPA-ORC
	Randa Bishlawi, U.S. EPA	Valencia Darby, Department of Interior
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	Carol Ropski, U.S. EPA	Barbara Carr, U.S. EPA
	John Hahn, USCG	Michelle Bas, USCG
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	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 Removal Action
Delta Fuels
1820 Front St, Toledo, OH
Latitude: 41.6586000
Longitude: -83.5047000

POLREP No.:	14	Site #:	Z5FG
Reporting Period:	6/20/06 - 7/21/06	D.O. #:	0064
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 #	68-S5-03-06
RCRIS ID #:		Reimbursable Account #	
FPN#	E06502		

Site Description

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

Current Activities

From June 20 - July 20, 2006, the EPA BOA contractor continued to de-water the off-site sewer system, which was impacted from petroleum released during the initial spill. The BOA contractor also maintains absorbent booms throughout off-site sewer system; maintain air plugs that are positioned to stop the migration of product/water through the sewer system; and to maintain slick bar and absorbent booms at the outfall pipe at the Maumee River. The EPA ERRS contractors continue to operate and maintain an on-site (in-situ) waste water treatment plant (WWTP) to treat and discharge contaminated water from the off-site sewer system. To date 2,037,997 gallons of contaminated water have been treated by the EPA on-site WWTP.

On July 10, 2006, the RP contractors began trenching/excavation activities on the west-side of the facility. The scope of work for contractor is to excavate approximately 10 to 15 feet below ground surface (bgs) around the perimeter of facility to install a geo-membrane liner (40 mils). This geo-membrane liner will be tied into the native 'blue-gray clay' to stop migration of spilled product from leaving the Site, as well as provide secondary containment to meet SPCC requirements. Development of workplans, health and safety plans, and air monitoring plans in addition to oversight of trenching/excavation activities and verification of depth and geological stratification is being conducted by a second RP consultant.

On July 5, 2006, EPA was approached by the RP to treat water for the on-site trenching/excavation

activities, which is due to several extreme weather events that flooded the entire eastern portion of the Site. In response to this request, EPA issued an Administrative Order by Consent (AOC) Under Section 311 of the Clean Water Act, which is currently being negotiated with the RP. START personnel have been tasked to conduct oversight and documentation of RP's contractors and to provide USEPA with on-going threat assessments in and around the site.

On July 10, 2006, START personnel noticed that contaminated Site water that contained a visible sheen was penetrating through the existing spill containment berm on the east-side of the Site. Water Samples were collected on July 11, 2006

On July 17, 2006, laboratory analytical results from off-site water samples indicated elevated levels of BTEX and TPH-GRO. The RP was contacted and made arrangements to collect and store the on-site water to prevent further releases. The RP again approached the EPA and requested assistance in treating the contaminated water while a permanent water treatment system is installed on-site.

On July 19, 2006, the ERRS contractor began treating contaminated water from the Site on a 24-hour basis.

On July 20, 2006, the RP collected additional water and soil samples off-site to determine the potential impact from the contaminated water release.

Planned Removal Actions

The RP will continue the excavating/trenching and installation of a geo-membrane liner around the perimeter of the petroleum distribution facility (including areas of future expansion).

The EPA ERRS contractor will continue to treat on-site and off-site contaminated water and mobilize to install a Dual Vapor Extraction System (DVES) to address off-site contamination of the ODOT sewer system.

The START contractor will continue to provide oversight of the RP contractor during the installation of the geo-membrane liner.

The BOA contractor will continue de-watering operations at the ODOT storm sewer system.

Next Steps

- The installation of the geo-membrane liner
- The implementation of the Dual Vapor Extraction System (DVES) around the off-site sewer system.
- The continuation of the de-watering of the off-site sewer system.
- The de-watering of the eastern perimeter tank farm to reduce control the continued threat of release of contaminated water.

Key Issues

START personnel observed/documented various locations (point sources) of on-site water seeping through secondary containment berm at eastern portion of tank farm. Analytical results from off site water samples indicated elevated BTEX and TPH-GRO constituents.

On July 19, 2006, 24-Hour de-watering operations began to address the heavily flooded eastern portion of RP's tank farm.

response.epa.gov/deltafuels