

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Friday, August 25, 2006

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 RP Removal Action

Delta Fuels
1820 Front St, Toledo, OH
Latitude: 41.6586000
Longitude: -83.5047000

POLREP No.: 15	Site #: Z5FG
Reporting Period: July 20 - August 25, 2006	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 July 20–August 25, 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 banks of 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 2,437,997 gallons of contaminated water has been treated by the EPA's on-site WWTP.

From July 10-25, 2006, the RP contractors began and continue trenching/excavation activities on the west, east and south-sides of the facility. The scope of work for the contractor is to excavate approximately 10 to 15 feet below ground surface (bgs) around the perimeter of the 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 work plans, health and safety plans, 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 20, 2006, the RP collected off-site sediment and water samples to determine the potential impact

from contaminated water that was penetrating through the existing spill containment berm on the east-side of the Site. Subsequent laboratory analytical results indicated elevated levels of TPH-GRO.

From July 20–27, 2006, the EPA ERRS contractor began treating contaminated water from the Site on a 24-hour basis. A total of 395,000 gallons of on-site contaminated water was treated.

On July 25, 2006, a representative of OEPA performed a site assessment of on-site RCRA issues and informed the RP consultants of violations and deadlines.

On August 2, 2006, the RP contractors ‘booted’ the Buckeye pipeline located in the southern portion of the site with the geo-membrane liner.

From August 8–23, 2006, the Ohio Department of Transportation (ODOT) conducted a forensic geo-technical investigation in the eastern and western perimeter of the Site. The investigation included in-field permeability studies and the collection of Shelby tubes for laboratory geo-technical evaluation.

On August 9, 2006, the RP conducted a ground penetrating radar (GPR) survey in the northern portion of the site where the geo-membrane liner will eventually tie into the western and eastern perimeter.

On August 15 and 16, 2006, the RP conducted a forensic geo-technical investigation in the eastern portion of the Site. This investigation was conducted by excavating test pits and trenches and documenting geological stratification of soil lithology.

On August 17, 2006, the RP signed an agreement with Enbridge Pipeline who operates a buried 16 inch high pressure crude oil pipeline in the eastern portion of the site. This agreement stipulates conditions for working around and on top of the pipeline. Representatives from Enbridge are periodically on site documenting/observing contractor activities.

From August 17–25, 2006, the EPA ERRS contractor began the implementation of the Dual Vapor Extraction System (DVES) around the off-site sewer system impacted from petroleum released off-site during the initial spill.

Planned Removal Actions

The RP will continue the excavating/trenching and installation of a geo-membrane (40 mils) around the perimeter of the petroleum distribution facility (including railroad unloading racks) and begin treating on-site water for discharge to the City of Toledo's sanitary sewer system (under a discharge permit during construction phase).

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

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

The BOA contractor will continue de-watering operations at the ODOT storm sewer system and maintain all necessary air plugs and absorbent booms located throughout the system.

Next Steps

Continuation of the EPA Oversight of the geo-membrane liner installation.

Start the operation of the Dual Vapor Extraction System (DVES) around the off-site sewer system.

Key Issues

The RP contractor continues to propose and implement work that is not covered in the approved Health & Safety Plans and On-Site Workplans. This has led to several delays in on-site work and has slowed the progress of eliminating the imminent and substantial threat which is posed by the release.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$600,000.00	\$326,000.00	\$274,000.00	45.67%
Ohio EPA-PRFA	\$20,000.00	\$14,000.00	\$6,000.00	30.00%

BOA Contractor	\$350,000.00	\$265,000.00	\$85,000.00	24.29%
START	\$200,000.00	\$190,000.00	\$10,000.00	5.00%
U.S.C.G.-AST	\$20,000.00	\$2,500.00	\$17,500.00	87.50%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$150,000.00	\$100,000.00	\$50,000.00	33.33%
Total Site Costs				
	\$1,340,000.00	\$897,500.00	\$442,500.00	33.02%

* 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.

response.epa.gov/deltafuels

POLREP #15 Last Updated 10/4/2006