

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Tuesday, October 10, 2006

From: Jon Gulch

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	Kevin Clouse, Ohio EPA	Timothy Murphy, City of Toledo
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Subject: Continuation of RP/Fund Lead Removal Action

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

POLREP No.:	16	Site #:	Z5FG
Reporting Period:	August 28-October 8	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 August 28 – October 6, 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 continues to maintain 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 4,006,100 gallons of contaminated water has been treated by the EPA's on-site WWTP.

From August 31 – September 11, 2006, RP contractors continued to install 40-mil Geo-membrane liner along 335 feet of the eastern site perimeter. 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. The excavation/trench was backfilled to grading equivalent with the ODOT Ramp X construction site to the east, and a layer of stone was added prior to compaction.

From September 12 – September 17, 2006, intermittent thunderstorms and inclement weather prohibited site activity beyond the routine dewatering of the off-site sewer system by EPA ERRS and BOA

contractors.

On September 18, 2006, the EPA ERRS contractor initialized the Dual Vapor Extraction System (DVES) installed for the remediation of the off-site sewer system. A START representative attended a meeting at the ODOT construction office adjacent to the Delta Fuels site. Attendees included representatives from ODOT, Enbridge, Wolverine and Delta Fuels. Discussion topics revolved around the affected Enbridge/Wolverine crude oil pipelines along the Delta Fuels site perimeter.

On September 21, 2006, an RP contractor performed Geo-probe/Geo-technical boring activities near the site warehouse (proposed future Bio-Diesel facility) and along the western access road.

On September 22, 2006, continuous 24-hour operation of the off-site DVES was initiated by the EPA ERRS and BOA contractors. Continuous operation and daily maintenance of the DVES will be performed for the next 1 – 2 months. Water removed from this system will be treated through the on-site EPA WWTP and discharged to the Maumee River after water samples from each successive batch of water has been analyzed by an off-site laboratory to ensure compliance with applicable State of Ohio discharge parameters.

From September 25 – September 29, 2006, there was no significant RP contractor activity. Dewatering of the off-site sewer system and operation of the DVES system continued on schedule.

From October 2 – October 5, 2006, RP contractors continued excavation work along the southern perimeter of the site, preparing to continue the installation of the geo-membrane liner along the site perimeter. Additional RP contractors began draining seven 6-inch AST outlet pipelines that penetrate the existing earthen secondary containment. These lines will be removed and relocated above ground in order to avoid compromising the secondary containment. Gasoline and diesel product removed from these seven 6-inch lines was removed into a vac-truck and pumped into on-site AST 4 by RP contractors on October 5, 2006.

On October 6, 2006, RP contractors began installing the 40-mil Geo-membrane around Enbridge pipeline #17, a 16-inch high-pressure crude oil pipeline located within an easement along the eastern property boundary between Delta Fuels and an ODOT construction zone to the east. Enbridge representatives were on-site to observe all work performed by RP contractors within 6 feet of the Enbridge pipeline. The Geo-membrane liner was “booted” around the pipeline and all seams in the liner were sealed with welding equipment. RP contractors also continued cutting and removing 6-inch underground pipes north of the existing earthen secondary containment.

From October 7–8, 2006, RP contractors continued the installation the 40-mil geo-membrane liner along the southern site perimeter. The excavation/trench was backfilled and construction of an earthen berm was begun. An Enbridge representative remained on site during excavation activities near the Enbridge pipeline.

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 the proposed Bio-Diesel facility) and 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 off-site contaminated water and continue to operate and monitor 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 RP contractor geo-membrane liner installation.

Continuation of operation of the Dual Vapor Extraction System (DVES) around the off-site sewer system and water collection/treatment.

Key Issues

The baseline sampling data from the backfill around the ODOT storm sewer system showed elevated soil vapor levels, elevated BTEX (Benzene, Toluene, Ethyl Benzene, and Xylene) and TPH-GRO (Total Petroleum Hydrocarbons-Gasoline Range Organics) levels in the water, and elevated BTEX and TPH-GRO soil vapor levels in the carbon cells (post treatment). These baseline numbers will be compared to weekly laboratory analytical data to determine effectiveness/completion of the DVES operation.

The ERRS/BOA Contractors continue to remove petroleum contaminated water from the off-site ODOT storm sewer system. Currently, the DVES is removing approximately 9,000 gallons/day. This contaminated water has consistently produced an oil sheen on the collection tanks and possesses a strong gasoline odor.

A funding increase for the project was requested and received from the National Pollution Fund Center (NPFC) bringing the project ceiling to \$1,780,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$700,000.00	\$537,000.00	\$163,000.00	23.29%
Ohio EPA-PRFA	\$20,000.00	\$14,000.00	\$6,000.00	30.00%
BOA Contractor	\$400,000.00	\$347,000.00	\$53,000.00	13.25%
START (TT)	\$200,000.00	\$200,000.00	\$0.00	0.00%
U.S.C.G.-AST	\$20,000.00	\$2,500.00	\$17,500.00	87.50%
START (Weston)	\$100,000.00	\$5,940.00	\$94,060.00	94.06%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$170,000.00	\$120,000.00	\$50,000.00	29.41%
Total Site Costs	\$1,610,000.00	\$1,226,440.00	\$383,560.00	23.82%

* 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 #16 Last Updated 10/10/2006