

**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Tuesday, October 10, 2006

From: Jon Gulch

To: Sam Borries, U.S. EPA	Jason El-Zein, U.S. EPA
Carl Norman, U.S. EPA	Mindy Clements, U.S. EPA
Beverly Kush, U.S. EPA	Tom Krueger, U.S. EPA-ORC
Randa Bishlawi, U.S. EPA	Valencia Darby, Department of Interior
Joe Ulfing, U.S. EPA	Thomas Marks, U.S. EPA
Mick Hans, U.S. EPA	John Glover, U.S. EPA
Isalee Coleman, U.S. EPA	Yolanda Bouchee-Cureton, U.S. EPA
Carol Ropski, U.S. EPA	Barbara Carr, U.S. EPA
John Hahn, USCG	Michelle Bas, USCG
Patricia Cooley, USCG	Duty Officer, USCG
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/Fund Lead Removal Action
Delta Fuels
1820 Front St, Toledo, OH
Latitude: 41.6586000
Longitude: -83.5047000

POLREP No.: 17	Site #: Z5FG
Reporting Period: 10/10/06 - 11/3/2006	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 October 10 – November 3, 2006, the EPA BOA contractor continued to de-water the off-site sewer system, which was impacted from petroleum released during the initial spill. This water frequently contains a petroleum sheen and/or gasoline odor, therefore cannot be directly discharged to the Maumee River. The BOA contractor also continues to maintain absorbent booms throughout off-site sewer system to prevent discharge of petroleum to the River; 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 4,234,319 gallons of contaminated water has been treated by the EPA's on-site WWTP.

From October 10 – October 11, 2006, RP contractors continued to drain and cold-cut aboveground pipelines between the AST's and fueling rack. One 8-inch pipeline and two 3-inch pipelines were drained, cold-cut, and plugged approximately 20 feet south of the northern earthen dike wall.

From October 11 – October 13, 2006, RP contractors began draining and cutting Wolverine diesel fuel pipelines located on the northwest corner of Delta property. Wolverine representatives observed and assisted RP contractors throughout this process. Three separate pipelines were located within a 20 square foot area north of the Delta warehouse building. All three Wolverine pipelines were disconnected and 1 to

2 foot section of each pipe was removed using a pneumatic powered reciprocating saw. Blind flanges were attached to the end of the pipes leading towards the active Wolverine pipeline. RP contractors abandoned the three Wolverine pipelines on Delta property to the south by inserting fresh clay one foot into each pipeline followed by one foot of solid concrete.

From October 16 - October 27, 2006, RP contractors continued to drain and remove buried pipelines north of the existing earthen dike wall. Contractors removed approximately 240 feet of 12-inch pipe, 290 feet of 6-inch pipe and 90 feet of 4-inch pipe containing gasoline, diesel and ethanol product. Contractors also removed several 2-inch and 3/4-inch electrical conduits located adjacent to the buried pipelines. START and RP contractors observed that gasoline product was discharged from one of the cut 2-inch electrical conduits between the earthen dike and the fueling rack.

From October 30 - November 3, 2006, RP contractors began excavation work to continue installation of the geo-membrane liner along the northern perimeter. Approximately 230 feet of liner was installed along the northern perimeter, and the base of the liner was "toed" into the native clay approximately 14 feet below ground surface. Additional RP contractors began constructing a 30' x 20' structure southeast of the fueling rack to house an on-site waste water treatment plant (WWTP). On November 3, 2006, the existing RP on-site WWTP was inoperable due to freezing overnight temperatures. EPA representatives accepted 3,000 gallons of waste water generated by RP contractors into the EPA site WWTP to ensure that water treatment and discharge would continue uninterrupted.

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 treating on-site water for discharge to the City of Toledo's sanitary sewer system (under a discharge permit during construction phase). In addition, RP contractors are building a permanent waste water treatment facility.

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

The EPA 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

Enbridge Pipeline has successfully extended and modified an existing Temporary Restraining Order (TRO) by Consent that will require Delta Fuels to remove the Geo-Synthetic Liner (40 mil HDPE) from the south end of the pipeline (as it enters Delta Fuels) and use an impermeable clay barrier in the Right-of-Way. In addition, Delta Fuels will excavate several trenches on-site to determine potential impact to the Enbridge Pipeline caused by the gasoline spill. The RP contractors/consultant will submit a new Work Plan detailing the procedures that will be implemented during the week of November 13, 2006.

The RP contractors/consultants will also modify the existing Scope-of-Work and Project Timeline to include these tasks. It is anticipated that the installation of the Geo-Synthetic liner system, including the new work associated with the Enbridge Pipeline, will be completed by November 22, 2006.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$700,000.00	\$683,000.00	\$17,000.00	2.43%
Ohio EPA-PRFA	\$20,000.00	\$14,000.00	\$6,000.00	30.00%
BOA Contractor	\$400,000.00	\$383,500.00	\$16,500.00	4.13%
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	\$17,680.00	\$82,320.00	82.32%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$170,000.00	\$130,000.00	\$40,000.00	23.53%
Total Site Costs				
	\$1,610,000.00	\$1,430,680.00	\$179,320.00	11.14%

* 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.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non Hazardous - Non Regulated Carbon	13.14 Tons	00001	Evergreen Landfill 2625 E Broadway Northwood, OH 43619
Non Hazardous - Non Regulated Soil and Water	6.55 Tons	00002	Evergreen Landfill 2625 E Broadway Northwood, OH 43619
Waste Flammable Liquids, N.O.S., 3, UN 1993, PGII, (D001)	3972 Gallons	001725434 JJK	Petro-Chem Processing 421 Lycaste X Detroit, MI 48214

response.epa.gov/deltafuels

POLREP #17 Last Updated 1/11/2007