

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Tuesday, January 9, 2007

From: Jon Gulch

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	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.:	18	Site #:	Z5FG
Reporting Period:	11-03-07 to 1-09-07	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

On December 12, 2006, USEPA and affected off-site stakeholders participated in a conference call to determine if the off-site Dual Vapor Extraction System (DVES) could be demobilized. The conference call included review of all soil, water, and vapor laboratory analytical data collected during the four month operational period, as compared to the baseline sampling. The result of the call was the decision to demobilize the DVES, but continue monitoring of the sampling wells.

During the first week of January 2007, the USEPA BOA contractor completed de-watering and jet-rodding activities in the off-site sewer system, which was impacted from petroleum released during the initial spill. This water frequently contained a petroleum sheen and/or gasoline odor and could not be directly discharged to the Maumee River. In addition, the BOA contractor removed previously maintained absorbent booms and sewer plugs, which were placed to stop the migration of product/water/sheen to the Maumee River. Previously maintained slick bar boom and absorbent boom in the Maumee River at the sewer outfall pipe have also been removed. In combination with the demobilization of the off-site DVES and with no further off-site dewatering activities, the USEPA ERRS contractors have started to demobilize the on-site (in-situ) waste water treatment plant (WWTP). To date, more than 4,234,319 gallons of contaminated water has been treated by the USEPA's on-site WWTP.

From November 4, 2006 to January 5, 2007, the RP contractor/consultant continued on-site de-watering/treatment activities of contaminated water and general housekeeping activities. In addition, the

contractor graded the on-site soil stock piles to prepare site conditions for the pending court ordered compliance certifications, which would allow Spill Prevention, Control, and Countermeasures (SPCC) operational activities within the active Enbridge Crude Oil Pipeline Easement. On January 8, 2007, the RP started the recent court ordered investigation. This included beginning the process of excavating impacted soils around the pipeline and exposing portions of the pipeline so that Enbridge consultants could determine the extent of damage to the coating of the pipeline and the soils within their easement. All work within the Enbridge Pipeline easement is overseen by Enbridge supervisors and START.

Planned Removal Actions

The USEPA ERRS and BOA contractors are currently demobilizing from the Site. The START contractor/consultant will continue to provide oversight of the RP Removal Actions.

The RP contractor/consultant will continue the excavation of the Enbridge Pipeline, under the supervision and oversight of both Enbridge and START. In addition, the Geo-Synthetic Liner (40 mil HDPE) 'boot' installed around the Enbridge Pipeline will be removed. After removal, all impacted areas within the Enbridge Pipeline easement will be filled with an impermeable barrier, such as packed clay or bentonite. The RP contractor/consultant has completed building a permanent waste water treatment plant for treating contaminated on-site water. The discharge is currently being conducted under a temporary permit for discharge to the City of Toledo's sanitary sewer system.

The RP contractor/consultant will finish the installation of the Geo-Synthetic Membrane liner system and bring the site into compliance with applicable Federal, State and local environmental regulations.

Next Steps

The START Contractor will continue to provide oversight of the RP contractor/consultant.

The RP will continue the daily observation of the off-site ODOT storm sewer system for sheen. In addition, the RP has agreed to sample the DVES monitoring wells on a quarterly basis for potential rebound of spilled petroleum product. All inspection records and analytical data will be provided to USEPA in the monthly progress reports, as required in the Order.

Key Issues

Enbridge Pipeline has successfully extended and modified an existing Temporary Restraining Order (TRO) by Consent, which will require Delta Fuels to remove the Geo-Synthetic Liner (40 mil HDPE) 'boot' and liner within the Enbridge easement from the south end of the pipeline (as it enters Delta Fuels) and use an impermeable clay barrier in the Southern right-of-way. In addition, a section on the north end of the containment system within the Enbridge easement will need work to reduce off-site migration of petroleum constituents. The RP contractor/consultant will excavate several trenches and expose the Enbridge Pipeline on-site for determination by Enbridge consultants/personnel of extent of impact to the Pipeline caused by the gasoline spill.

The RP contractor/consultant will submit a new Work Plan detailing the procedures that will be implemented during the week of January 8th, 2007.

The RP contractor/consultant will also modify the existing Scope-of-Work and Project Timeline to include these tasks. It is now anticipated that the installation of the Geo-Synthetic Membrane liner system, including the new work associated with the Enbridge Pipeline, will be completed by March of 2007.

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