

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, August 3, 2007

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Chris Bodin, Florida DEP

Subject: Special POLREP, PRP Site Sampling During Negotiation Period
BCX
1903 EAST ADAMS STREET, Jacksonville, FL
Latitude: 30.3221517
Longitude: -81.6308534

POLREP No.:	0	Site #:	A4FE
Reporting Period:	7/30/2007 - 8/3/2007	D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:		Response Type:	
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Assessment
CERCLIS ID #:	FLD982109761	Contract #	
RCRIS ID #:			

Site Description

- 1987: International Processing Specialists (IPS) leased the property to operate a waste water facility
- 1991: IPS began used oil processing
- 1995: An explosion at its 630,000 gallons used oil storage tank caused the death of one of IPS's employees. As a result of the explosion, FDEP conducted an inspection of the facility
- 1996: FDEP entered into a Consent Order with DPS that required EPS to upgrade its facility and allow it to continue to operate the used oil processing facility until it completed a permit application.
- 1997: FDEP issued a permit to IPS for operation as a used oil processing facility.
- 1999: After sending several letters to the facility regarding non-compliance, FDEP issued to IPS an Intent to Deny a permit modification request for accepting and processing Petroleum Contact Water at the EPS facility.
- 2000: FDEP filed a Civil Complaint to compel compliance, prohibit receipt of used oil or wastewater by the facility, revoke the permit, and collect penalties.
- 2002: FDEP issued a Final Order to revoke IPS's Used Oil Processor permit.
- 2001: BCX became the new owner of the facility.
- 2001 to 2004: FDEP and the City of Jacksonville made several attempts to force EPS and BCX to remove waste and close the facility. In 2001, the facility removed equipment, containers and associated piping in a process area and demolished the process building. No waste was removed from the tanks.
- June 2004: an inspector with the City of Jacksonville's Tanks Program discovered an accumulation of wastewater in the secondary containment area and that a crack in the containment wall was allowing waste to leak to the environment. FDEP confirmed the City's findings and contacted BCX. No action was taken by BCX.
- June 11, 2004 the City of Jacksonville obtained an emergency Temporary Injunction ordering BCX, IPS, related companies, and real property owners to remove waste from the secondary containment within 1 week, sample wells within 3 weeks, remove all waste from the tanks within 3 months, and to remediate contamination and provide financial assurance. No action was taken.
- June 21, 2004: EPA mobilized to the BCX Tank Site along with the FDEP, Bureau of Emergency Response to conduct a removal site evaluation. EPA discovered abandoned tanks on the Site within a concrete secondary containment wall that showed signs of past leakage. The secondary containment also held over two feet of waste water from various tank leaks and area rain. Based on Site history, contents of the tanks were believed to contain waste that exhibited hazardous characteristics under RCRA (ie. Flammability). The waste at the facility was considered CERCLA hazardous substances and posed an immediate threat to human health and the environment. EPA initiated an emergency response at the Site.
- December 30, 2004: EPA completed the Emergency Response action at the site. 1,248,155 gallons of wastewater and 1,435 tons of waste sludge were removed from the Site during the response.

EPA has identified several PRPs as generators of the waste materials that were found at and removed from the Site.

Current Activities

The PRP group has hired Arcadis as their technical contractor for the site and SWS (Southern Waste Services) to conduct sampling at the site.

Arcadis and SWS mobilized to the site on July 30, 2007 for sampling. EPA and START mobilized to the site to conduct oversight, documentation, and obtain split samples. The purpose of sampling was to determine the amount, type, and composition of waste remaining on-site in each of the tanks.

SWS employed a crane and basket to hoist two persons above each tank where samples could be taken. Samples were collected in approximately 2-3 gallon quantities then transported to ground level where samples were transferred into appropriate jars. START collected split samples for simultaneous analysis at a separate laboratory.

Tanks 13, 15, and 101 were reported to be completely dry and no samples were taken.

Tanks 10, 14, 16, 102, 105, 108, and 109 were nearly empty and contained only residual materials but no samples could be taken. Tank 10 contained compressed solids but no liquid. Tanks 14 and 16 contained sand/sediment approximately 1 inch in depth. Tank 102 contained approximately 2 inches of thick greasy solid. Tank 105 contained less than an inch of clay-like brown material. Tank 108 contained a black oily sludge. Tank 109 contained a black/brown clay-like material.

Tanks 2, 100, 103, 104, 106 and 107 contained some amount of material that was sampled and sent for analysis. Tank 2 contained approximately 2.5 feet of oily material. Tank 1000 contained less than an inch of black oil-like material. Tank 103 contained approximately 2 feet of black colored water with an oil sheen. Tank 104 was approximately half full with black oil-like material. Tank 106 contained approximately 2 feet of sludge with approximately 3 inches of oil on top. Tank 107 contained approximately 3 feet of black oil-like liquid and approximately 2 inches of sludge.

Tank 12 was approximately half full of asphalt-like material with approximately 2 inches of water on top, none of which could be sampled. Tank 17 could not be accessed via the top, nor could any valves near the tank be reached; the tank was never sampled. Tank 100 yielded only enough material during sampling to accommodate one complete sample; a split sample of Tank 100 was never collected.

EPA, START, Arcadis, and SWS demobilized from the site on August 1, 2007.

Planned Removal Actions

EPA anticipates that the following removal actions will be conducted at the site:

- Removal of waste water and sludge from within the tanks and secondary containment area;
- Decontamination and cleaning of the tanks and secondary containment areas;
- Disposal of the waste water and sludge removed from the tanks and secondary containment area, including any sampling and analysis necessary to determine proper treatment and disposal methods; and
- Stabilization and/or removal of the tanks and secondary containment wall to prevent future releases of hazardous substances from the Site.

Next Steps

Negotiations with the PRPs is ongoing at this time.

[response.epa.gov/BCX](https://www.epa.gov/BCX)