United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Saturday, February 2, 2008
From: Matthew Huyser

To: Shane Hitchcock, USEPA Chris Bodin, Florida DEP

Subject: Initial POLREP - mobilization to the site
BCX
1903 EAST ADAMS STREET, Jacksonville, FL
Latitude: 30.3221517
Longitude: -81.6308534

POLREP No.:	1	**Site #:**	A4FE
Reporting Period:	1/22/2008 - 2/2/2008	**D.O. #:**	
Start Date:	12/17/2007	**Response Authority:**	CERCLA
Mob Date:	1/22/2007	**Response Type:**	
Demob Date:	7/11/2008	**NPL Status:**	Non NPL
Completion Date:	8/1/2008	**Incident Category:**	Removal Action
CERCLIS ID #:	FLD982109761	**Contract #**	
RCRIS ID #:			

Site Description
The site is located at 30.3225° north, 081.6308° west; it encompasses approximately 1.1 acres, though the impacted area of tanks and secondary containment covers only 0.4 acres. It is owned by Seven Out LLC, a Florida company affiliated with BCX Inc. of Georgia. Land use near the site is commercial, consisting of terminals, ship yards, and parking lots for Alltel stadium which is located 0.3 miles to the West. The nearest surface water body is the St. Johns River at ¼ mile to the East and South. The waste material is confined to several aboveground storage tanks which are positioned in a secondary containment area comprised of a 700-foot long, 6-foot high, concrete wall. The 2000 Census information indicates a population of approximately 1100 residents within a 1 mile radius from site, all located to the North and Northeast.

Between 1987 and 2000, International Processing Specialists (IPS) leased the property to operate a waste water and used oil processing facility. In 2001, BCX became the new owner of the facility. Between 2001 and 2004, BCX removed equipment, containers, piping, and demolished the process building. No waste was removed from the tanks.

In June of 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. On 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, sample wells, and tanks. No action was taken.

On June 21, 2004, OSC Terry Stilman mobilized to the BCX Tank Site and initiated an emergency response action to address the leaking tanks and waste accumulation in the secondary containment wall. Approximately 1.2 million gallons of waste-water and 1400 tons of sludge were sent off-site for treatment due to high levels of benzene, tetrachloroethene, naphthalene, and other contaminates. Emergency actions were completed in December of 2004.

On October 10, 2007, EPA signed an Administrative Settlement Agreement and Order on Consent for Removal Action with 16 waste generators who sent waste materials to the site to remove the remaining waste materials from the site and decontaminate the surfaces.

Approximately 115,000 gallons of waste-waters and sludge remain in tanks.

Current Activities
The RP group has hired Geosyntec to provide engineering and consulting work throughout the project, and has hired Moran Environmental to conduct the removal action. Representatives from both companies will remain on-Site throughout the project.

Both contractors mobilized to the Site on January 22, 2008. EPA met with FLDEP, Geosyntec, and Moran on January 23 to discuss the work plan, scheduling, and expectations over the course of the removal. Representatives from FLDEP located in the Jacksonville office will visit the site periodically.

During the first week, a sign board was erected with the Site name and emergency contact information.

Samples were collected by Geosyntec from the rainwater in the secondary containment area on December 17, 2007 and analyzed according to requirements by the City of Jacksonville POTW. The results showed no hazardous substances, and the rainwater was cleared for discharge to the POTW in a written letter sent by the POTW operator. The volume of rainwater is estimated in a range from 150,000 to 300,000 gallons. Pumping of rainwater was started during the first week and was discharged to a manhole a rate of 30 gpm for 10 hours per day. The initially low flow rate is intended to provide an indication as to whether this water will impact the treatment process; the flow rate may be increased to 60 gpm and then to 100 gpm when a determination is made by the POTW operator that no impact has occurred.

Geosyntec produced Task Hazard Analysis (THA) documents/procedures for:
- Pumping Secondary Containment (THA2)
- Tank Analysis and Assessment (THA3)
- Pumping Secondary Containment Water to Tankers or Poly Tank AST (THA4)

START arrived on-site on January 24 to assist with documentation and split sampling. START will be reviewing THAs and the activities they describe to ensure that they are being conducted safely and accordingly.

More than 50,000 gallons of rainwater was discharged from the secondary containment area up to February 1, 2008.

No wind or weather data was collected during this reporting period. Although present information indicates that there is no threat of a release to the air during the removal, air monitoring will be conducted as a precaution.

The estimated demobilization date is July 11, 2008 and the estimated completion date (Final POLREP) is August 1, 2008.

Planned Removal Actions
- Remove waste water and sludge from within the tanks and secondary containment area (ONGOING-Secondary Containment)
- Decontaminate and clean of the tanks and secondary containment areas (ONGOING-Secondary Containment)
- Dispose 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 (ONGOING-Secondary Containment)
- Stabilize and/or remove of the tanks and secondary containment wall to prevent future releases of hazardous substances from the Site (NOT YET INITIATED)

Next Steps
- Complete discharge of rainwater from secondary containment
- Prewash secondary containment clear of sludge, biological growth, and other slip hazards
- Perform pre-inspection of tanks
- Begin tank sampling

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	$53,600.00	$6,953.15	$46,646.85	87.03%
Intramural Costs				
Total Site Costs	$53,600.00	$6,953.15	$46,646.85	87.03%

* 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/BCX