

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

Date: Friday, February 29, 2008

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Chris Bodin, Florida DEP

Subject: Tank Sampling and Phase I Deconstruction

BCX

1903 EAST ADAMS STREET, Jacksonville, FL

Latitude: 30.3221517

Longitude: -81.6308534

POLREP No.:	2	Site #:	A4FE
Reporting Period:	2/2/2008 - 2/15/2008	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

See POLREP #1 for background and site description information.

Current Activities

Moran continued pumping of remaining rainwater in the secondary containment area and discharge to sanitary sewer system with cooperation of the Jacksonville POTW. Pumping was completed on February 5, 2008 after an estimated total of 150,500 gallons had been discharged since January 25.

After the rainwater was removed from the secondary containment, Moran crews began cleaning and removing debris from the containment area to two roll-off bins. The roll-off bins will be used to transport trash and uncontaminated waste that will be discarded in a subtitle D landfill. The walls and floor of the containment area were pressure washed to remove organic matter and slip hazards. Wash water, as well as additional rainwater that falls inside the containment area over the course of the removal action, will be captured by Moran's pump truck and sent offsite for disposal at Water Recovery Inc. (WRI) in Jacksonville, FL.

On February 11, Moran began removal and segregation of pipes and metal equipment to create a pathway for machinery and other removal equipment inside the containment area. Pipes and openings that contain contaminated materials are being capped and bagged to prevent spillage. In one incident, product began to leak inside the containment area when pipes were cut around a 500 gallon tank. The openings were capped and cleaned, and the product was removed. In response to the incident, Geosyntec ceased all on-site activities to conduct a safety meeting and amend the THA to prevent future releases.

On February 12, piping was cut into sections using a cold cut process and decontaminated using a high pressure washer and degreasing fluid. The decontaminated pipes were then removed to a roll-off container outside of the secondary containment. Wipe samples were not being taken from decontaminated piping as they will be sent off-site for metals recycling and the recycler has been made fully aware of the pipe's origins and previous use. Wipe samples, as outline in the work plan, will be collected from surfaces that will remain on-site after removal completion.

Due to a significant amount of liquids in Tank 107, a sample was collected on February 12 for WRI to analyze and determine if it could be received and treated at WRI's facility. A hole was drilled into a connection pipe of Tank 107 and elevated levels of H2S and LEL were detected. The hole was immediately plugged. Readings were taken again once the pipe had stabilized and no elevated readings were found. The hole was plugged again

Rainfall on February 12 and 13 filled secondary containment and was pumped throughout the day on February 13, 14, and 15 for transportation and disposal at WRI. The pump truck is being parked in a

portable secondary containment trough during these activities.

A 10-foot section of the secondary containment wall at the southeast corner was demolished on February 13 to permit access by small heavy machinery and other equipment. A lip of 12 inches remains to provide some containment of future rainwater.

A manlift was used to inspect the inside of tanks 102, 103, 104, 105, 106, 107, 10, 12, 13, 14, 15, 16, and 100 from above. Material heights were gauged and marked on the outside of the tanks.

Clearing of the containment breach was completed on February 14 and scaffolding was brought into the containment area to assist with access to the holes that were cut into the tanks.

On February 15, samples were collected from tanks 10, 13, 14, and 101; split samples were collected from tank 13 and 101 by START.

No state or local representatives visited the site during this time period.

To date, the following materials have been transported off-site for treatment and disposal or recycling:

- 150,000 gallons of rainwater to the Jacksonville POTW
- 30,675 gallons of rainwater to WRI in Jacksonville, FL

Planned Removal Actions

- Remove waste water and sludge from within the tanks and secondary containment area (COMPLETE-Secondary Containment; ONGOING-Tanks)
- Decontaminate and clean of the tanks and secondary containment areas (INTERIM-Secondary Containment; ONGOING-Tanks)
- 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; ONGOING-Tanks)
- 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

- Receive laboratory analysis and compare Geosyntec data with split samples taken by START
- Continue decontamination of piping and metal equipment for disposal or recycling
- Begin opening tanks to remove waste material

Key Issues

Rainwater continues to fill the secondary containment during each rain event. A 12" rise that remains after breaching the secondary containment wall allows for some level of containment during overnight rain events. These waters are no longer being discharged to the Jacksonville POTW but are being transported to the nearby WRI treatment facility by truck.

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