

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, March 3, 2008

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Chris Bodin, Florida DEP

Subject: Tank Sampling and Phase II Deconstruction

BCX

1903 EAST ADAMS STREET, Jacksonville, FL

Latitude: 30.3221517

Longitude: -81.6308534

POLREP No.:	3	Site #:	A4FE
Reporting Period:	2/18/2008 - 2/29/2008	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

Inclement weather ceased most site operations on February 18. One load of rainwater was pumped from secondary containment and transported to WRI for treatment. Subsequent loads of rainwater were pumped from secondary containment and transported to WRI throughout the week until February 22.

On February 19, Moran completed cutting access holes to all tanks above the material levels. Access holes are approximately 2-feet in diameter and are being used for sample collection and inspection of the material's properties. Solids in several tanks show signs of drying with deep wide cracks forming along the surface and water or oily material found in the crevices. Much of the material remains soft and spongy so that it is unpumpable but cannot be described as dry.

The hole cut in tank 101 revealed much more material than originally gauged from the upper manhole. The tank is approximately 30,000 gallons in volume, contains baffles at regular intervals of 2'-3' in height, and was holding approximately 2'-3' of solids at its lowest point. Crews began removing solids from tank 101 on February 19 and staging them at the northeast corner of the site on plastic sheeting. The solids are relatively dry compared with material in other tanks and may be used for solidification.

On February 21, a roll-off container with decontaminated scrap metal was sent off-site for recycling to Berman Brothers of Jacksonville, FL. Also, a roll-off container of trash and debris was sent off-site for disposal to Waste Management's Chesser Island landfill in Folkston, GA.

Sampling was completed on February 21. Some tanks contained a small amount of material, so it was determined that some samples could be composited and the materials would be combined during disposal. The composited tanks included: 15 with 16; 102 with 105; and 114 with 115. START collected split samples from tank 12 and 114 with 115.

Constance Cummings, an environmental specialist with the Jacksonville Petroleum Cleanup Activity, visited the site on February 21 to discuss the city's previous cleanup actions and relationship with the facility.

On February 25, a marine chemist with Southern Marine Chemists of Jacksonville, FL performed air monitoring and an inspection of the tanks. The chemist issued a hot work permit for tanks 109, 107, 105, 103, 101, 111, 110, 100, 16, 17, 14, 10, 13, 15, and 12 so that torches may be used to cut the tanks apart. A hot work permit was denied for tanks 108, 112, 02, 114, 106, 102, 104, and 115 due to LEL readings above 0%; these tanks will have to be dismantled using "cold-cutting" techniques.

OSC Huyser and Geosyntec reviewed the approved Work Plan and THA regarding the decontamination process for piping and equipment. It was determined that the rinsate sampling required by the approved Work Plan was intended for surfaces that would remain on-site following the removal action. As the piping and other metal is being sent off-site for recycling, and the receiving facility has been made aware of its origins, OSC Huyser will not require Geosyntec to perform rinsate samples on the piping or other metal before it is sent to the recycler. However, Geosyntec was advised to require supervisor oversight and regular inspection of the decontamination process as part of the THA. The change to the THA was made on February 25.

Torch cutting of tanks began on February 25 by cutting above the material line and removing the upper portion of the tank. The material is being covered by a tent of plastic sheeting to prevent rainwater from pooling. The upper portions of the tanks are being staged inside the containment area for decontamination. These large pieces were transported off-site for recycling in tact, without further deconstruction.

Through February 29, tanks 108, 109, 101, 10, 16, 14, 15, 13, 12, and 17 were partially dismantled by torch or cold-cutting, decontaminated, and transported off-site for recycling

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
- 63,925 gallons of rainwater and oily water to WRI in Jacksonville, FL
- 2.68 tons of trash and debris to Waste Management's Chesser Island Landfill in Folkston, GA

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 removing, bulking, and transporting solids off-site for disposal
- Initiate strategy of opening largest tank (02 at 630,000 gallons) and removing waste material

Key Issues

The marine chemist subcontractor hired by Moran was found to not have had the 40 hour training and certification as outlined in 29 CFR 1910.120 (e)(3)(i) and was initially not permitted to work on the site by OSC Huyser. The subcontractor was allowed to perform at the site after 1) documentation was provided for equivalent training under 29 CFR 1910.120 (e)(9), 2) the site-specific HASP was amended to accompany this provision, and 3) the subcontractor was provided with site-specific health and safety training prior to performing work.

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