

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

Date: Tuesday, March 18, 2008

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Chris Bodin, Florida DEP

Subject: Temporary Demobilization for Disposal Decision

BCX

1903 EAST ADAMS STREET, Jacksonville, FL

Latitude: 30.3221517

Longitude: -81.6308534

POLREP No.:	4	Site #:	A4FE
Reporting Period:	3/3/2008 - 3/14/2008	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:		Incident Category:	Removal Action
CERCLIS ID #:	FLD982109761	Contract #	
RCRIS ID #:			

Site Description

See POLREP #1 for background and site description information.

Current Activities

Substantial rain fell over the weekend of March 7, 8 and 9. A significant amount of time on March 10 was used to pump water from the containment area. Pumped waters were disposed of at WRI.

During this reporting period, tanks 103, 105, 104, 102 were cut into two sections where the lower section containing sludge and solidified materials was left in place and covered, while the upper section was decontaminated and transported off-site for recycling. Cutting, decontamination, and recycling of pipes continued during this period also.

The catwalk connecting tanks 106 and 02, and the stairway of tank 107 was removed and sent off-site for recycling.

Samples of sludge and solidified materials were collected during the week of March 3 from tanks 02, 104, 106, and 107. START collected a split sample from one of the four solids samples. A product/liquid sample was collected from tank 104.

Geosyntec and Moran performed a bench-scale solidification test with sludge materials from tanks with fluidized bed ash acquired off-site. The necessity, process, and mixing materials for solidification has not been determined at this time.

Waste Management notified Moran and Geosyntec during the week of March 10 that the waste material in the tanks could not be accepted at the intended landfill based on the totals analytical results. TCLP analysis has been requested by WM for several tanks to provide approval for disposal. Due to the lack of work remaining at the site until disposal operations begin, Moran and Geosyntec demobilized most of the personnel and resources from the site on March 12 to save on operating costs.

EPA instructed Geosyntec on March 14 to provide adequate oversight and security of the site during the temporary demobilization of major resources. Moran will continue to provide monitoring of site conditions and will pump rainwater from the containment area as necessary.

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
- 96,225 gallons of rainwater and oily water to Water Recovery Inc. 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)
- Stabilization and/or removal of the tanks and secondary containment wall to prevent future releases of hazardous substances from the Site (NOT YET INITIATED)

Next Steps

- Collect additional samples characterize waste materials for landfill disposal
- Seek and evaluate and propose alternative disposal locations
- Complete QA/QC of data packages received thus far
- Remobilize to the site and continue waste disposal and tank demolition activities
- Continue decontamination of tanks, piping, and other materials for disposal or recycling
- Evaluate decommissioning of secondary containment area including abandoning monitoring wells in the containment area and impact of low spots in containment floor that prevents surface water drainage of area as required following the completion of site activities

Key Issues

Waste Management raised several issues during the week of March 10 regarding analytical results the sludge and solidified materials. WM has requested TCLP analysis to be performed on several tanks for metals and VOCs. WM may also deny the material due to elevated levels of dibenzofuran that may leach to waters which are collected by the landfill and sent to a wastewater treatment plant. Geosyntec will collect more samples during the week of March 17 to perform TCLP analysis, but is additionally seeking an alternative landfill to dispose of the tank sludges.

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