

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

**Date:** Thursday, May 1, 2008

**From:** Matthew Huyser

**To:** Shane Hitchcock, USEPA

Chris Bodin, Florida DEP

**Subject:** Remobilization and Removal of Tank Solids

BCX

1903 EAST ADAMS STREET, Jacksonville, FL

Latitude: 30.3221517

Longitude: -81.6308534

|                          |                       |                            |                |
|--------------------------|-----------------------|----------------------------|----------------|
| <b>POLREP No.:</b>       | 5                     | <b>Site #:</b>             | A4FE           |
| <b>Reporting Period:</b> | 3/17/2008 - 4/25/2008 | <b>D.O. #:</b>             |                |
| <b>Start Date:</b>       | 12/17/2007            | <b>Response Authority:</b> | CERCLA         |
| <b>Mob Date:</b>         | 1/22/2007             | <b>Response Type:</b>      |                |
| <b>Demob Date:</b>       | 7/11/2008             | <b>NPL Status:</b>         | Non NPL        |
| <b>Completion Date:</b>  |                       | <b>Incident Category:</b>  | Removal Action |
| <b>CERCLIS ID #:</b>     | FLD982109761          | <b>Contract #</b>          |                |
| <b>RCRIS ID #:</b>       |                       |                            |                |

**Site Description**

See POLREP #1 for background and site description information.

**Current Activities**

During the weeks of March 17 through April 4, Moran Environmental crews were temporarily demobilized from the site pending selection of a new landfill to accept the solidified sludge waste and analytical results for disposal. A minimal crew of Geosyntec personnel remained on-site periodically during this time to provide security and monitoring of rainwater accumulation in the secondary containment area. No waste materials were removed from the site during the three week stand-down period.

On March 17, Geosyntec collected sludge samples from Tanks 02, 106, and 107 for a bench-scale experiment of the solidification proposal. Samples were mixed with a proportional volume of bed ash and then sent off-site for laboratory analysis.

An undetermined amount of water remains in the largest tank (Tank 02) and may require an alternative method of disposal. A sample of water dripping from a valve on Tank 02 was collected on March 25 and sent off-site for laboratory analysis.

On April 7, oil sludge samples from Tanks 02, 106, and 107 were collected and sent off-site to a fuel blending facility for evaluation as a possible fuel source. Fuel blending is being considered as a potential recycling option for some of the oily-material stored in these tanks.

Light rain during the stand-down period caused some accumulation of water in the secondary containment area. 9,200 gallons of rainwater was removed from the site on April 8 and sent off-site for treatment and disposal at WRI.

Moran Environmental remobilized to the site on April 14 to begin bulking and solidification of sludge from tanks. TCLP analysis on sludge samples from the tanks were received prior to remobilization. No sample yielded exceedances of regulatory thresholds for toxicity characteristics of the waste.

Between April 14 and April 25, Moran removed and solidified sludge from Tanks 108, 109, 102, 103, 105, 104, 110, 15, 16, and 13. Three loads of solidified sludge waste were sent off-site for disposal at the Republic Landfill in Broadhurst, GA.

Geosyntec expressed interest in closing three groundwater monitoring wells located inside the secondary containment area to provide a better working area. Crews reported that the well casing was damaged and likely would be inadequate for future use. OSC Huyser offered consideration of installing a flush mounted well head as an alternative measure, but also advised Geosyntec to not close the wells without consent of

the PRPs, the landowner, and the Florida DEP. Chris Bodin of FLDEP was notified of the issue and visited the site on April 24 to inspect the wells and provide a determination on whether the FLDEP will want them to remain open.

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
- 105,425 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
- 3 truckloads of non-pumpable solids to the Republic Landfill in Broadhurst, 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**

- Complete removal and solidification of sludge and solids from smaller tanks
- Initiate removal and solidification of sludge and solids from large tanks (02, 106, 107)
- Complete analysis of fuel blending option for recycling oily material in large tanks
- 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**

The original landfill, Waste Management's Chesser Island, had requested totals analysis on the sludge material but voiced some concern over some of the results such as Dibenzofuran. While some of the C&D materials are still being sent to WM's Chesser Island facility, a new landfill location is being set up for disposal of the sludge wastes. Republic Landfill in Broadhurst, GA is currently working with Geosyntec, with the oversight and approval of EPA, to establish a confirmatory sampling process of the solidified sludge that will meet RCRA's UTS and LDR. OSC Huyser provided direction and guidance to Geosyntec on acceptable practices of disposal and analysis based on federal regulations, EPA guidance, and information gathered from EPA experts.

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