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

**Date:** Wednesday, June 11, 2008
**From:** Matthew Huyser

**To:** Shane Hitchcock, USEPA Chris Bodin, Florida DEP

**Subject:** Solidified Sludge Removal Nearly Complete
BCX
1903 EAST ADAMS STREET, Jacksonville, FL
Latitude: 30.3221517
Longitude: -81.6308534

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| **POLREP No.:** | 6 | **Site #:** | A4FE |
| **Reporting Period:** | 4/28/2008 - 06/06/2008 | **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**
A significant amount of rain fell into the secondary containment area on April 28. The following day was spent removing and pumping rainwater, and drying the secondary containment area to begin work. Three truckloads of rainwater was collected and sent off-site to WRI for treatment.

Another rain event required pumping and drying on May 19. A single truckload of rainwater was collected and sent off-site to WRI for treatment.

On May 1, MER determined that Tank 12 could not be sufficiently emptied in its upright position and proposed tipping the tank onto its side while sludge material was still within the tank. The START representative on-site contacted OSC Huyser and relayed the proposal. OSC Huyser determined, based on the safety precautions being taken by MER, that handling the tank in this way would be acceptable. MER also proposed leaving the waste uncovered overnight during periods when rain was extremely unlikely, to provide better conditions for it to dry out as much as possible. OSC Huyser determined that the proposal of leaving the waste uncovered during periods of non-predicted rain was acceptable provided that security measures preventing access to the site were sufficient.

By May 2, sludges had been removed and solidified from the following tanks: 108, 109, 102, 103, 105, 104, 110, 15, 16, 13, 114, 115, 13, 14, 15, 16, and 12.

Results from the water collected from Tank 02 on March 25 were received; totals analysis indicated elevated levels of zinc and cadmium, but TCLP analysis determined that the liquid was nonhazardous and thus could be sent off-site to WRI for treatment

Oil samples collected from Tanks 02, 106 and 107 on April 7 were analyzed for reuse in a fuel blending facility, but results received indicated a high level of solids and insufficient “melting point” for this purpose. The oily liquids were stored in Tank 112 until these results were received, then were combined with a remaining pile of bed ash during the week of June 2 for bulking and disposal with the solidified tank sludges. Field-conducted paint-filter testing showed that the solidification of the oily liquid was extremely successful and sufficiently dry.

After receiving approval from OSC Huyser, FLDEP, the City of Jacksonville, the RPs, and the lien-holder on the BCX property, Geosyntec was able to close two of the three shallow water monitoring wells within the secondary containment area. Partridge Well Drilling of Orange Park, Florida cemented two of the three wells within the containment area on May 15. The third well was not plugged due to an obstruction

within the well, however that well's location is not an obstacle to current activities and will not be further addressed.

During the week of May 12, OSC Huyser visited the site to conduct interviews with nearby residents, businesses, and local officials. General concerns surrounding the site included the presence of intermittent odors and later post-removal conditions. As a result of the odor concerns, local businesses were asked to contact the OSC immediately if odors were detected; air monitoring activities have been adjusted to include strength, direction, and distance of off-site odors. Thus far, odors have not been found to migrate beyond the immediate vicinity of the containment wall and no complaints have been reported.

On May 19 at approximately 9:00am, a latch on the rear door of a trailer hauling solidified non-hazardous waste from the site to Broadhurst Landfill in Screvin, GA had a failure and released 1.5 cubic yards of material onto the asphalt shoulder of I-95 northbound near exit 357 (Edgewood Ave) in Jacksonville, FL. Jorgenson Contracting Services had personnel and equipment staged at the exit ramp for construction activities and responded to the release by moving the material into an 8-yard dump truck with a skid steer, brooms and shovels. MER was notified of the event at 10:15am. MER inspected the truck's route from the Site and found no additional material on the road or to the side of the road along the route. Jorgenson's dump truck was instructed by MER to return the material to the BCX Tank Site. The Florida Highway Patrol has reported the incident under case number 16951. No citations were issued and no further actions were required by the responding parties. The trailer with the failed latch was repaired and secured before further use. OSC Huyser was informed of the event by Geosyntec on the afternoon of May 19. After reviewing the reports and questioning MER, OSC Huyser had no further recommendations or actions related to the release.

During the week of May 26, a number of media outlets including the local newspaper and television stations began contacting OSC Huyser and visiting the site simultaneously. Information was provided to media via the www.epaosc.net/bcx and from Geosyntec and no follow-up concerns have been encountered.

MER completed removal of sludges from Tank 02 during the week of May 26. Removal of sludges from Tanks 107 and 106, and the decontamination of Tank 02 were completed the following week of June 2.

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
- 125,076 gallons of rainwater and oily water to Water Recovery Inc. in Jacksonville, FL
- 4.7 tons of trash and debris to Waste Management's Chesser Island Landfill in Folkston, GA
- 1324.3 tons 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; COMPLETE-Tanks)
- Decontaminate and clean of the tanks and secondary containment areas (INTERIM-Secondary Containment; COMPLETE-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 (ONGOING)

**Next Steps**
- Complete decontamination of tanks, piping, and secondary containment area
- Collect rinsate samples from decontaminated surfaces to confirm absence of pollutants or contaminants
- Demolish and cut-up Tanks 02, 107, and 106
- Implement security and safety measures for post-removal site conditions

**Key Issues**
For demolition of the three largest field-constructed above ground storage tanks (Tanks 02, 107, and 106) Geosyntec and MER have proposed subcontracting the services of a professional demolition crew. While the safety aspects of dismantling these large tanks would be better addressed by this professional crew with experience in mid to large scale demolition, it is unlikely that their personnel will have 40-hour HAZWOPER certification and thus will not meet the requirements of the initial site-specific HASP. For this reason, OSC Huyser has asked that the demolition subcontractor be provided with an expanded Health and Safety briefing prior to initiating work, and that all subcontractors be accompanied by an MER or Geosyntec employee while inside the secondary containment area. OSC Huyser has also

asked that any work needing to be done inside the tanks be conducted by an MER employee when possible, and that an emergency alarm and evacuation system be established for this activity. An EPA OSC will be assigned to conduct oversight for all of these activities. Demolition is set to begin on June 17 and last approximately 3 days.

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