

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Thursday, August 14, 2008

From: Mark Hayes

To: R6 PolRep LA, Response and Prevention Branch
USCG NPFC, USCG - NPFC

Subject: (FPN E08629) Nebo-Hemphill Unnamed Production Oil Salvage

Near Jena, LA

Latitude: 31.5912500

Longitude: -92.1398610

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|--------------------------|-----------|-------------------------------|--------------------|
| POLREP No.: | 1 | Site #: | E08629 |
| Reporting Period: | | D.O. #: | |
| Start Date: | 7/21/2008 | Response Authority: | OPA |
| Mob Date: | | Response Type: | |
| Demob Date: | | NPL Status: | Non NPL |
| Completion Date: | | Incident Category: | Removal Assessment |
| CERCLIS ID #: | N/A | Contract # | |
| RCRIS ID #: | N/A | Reimbursable Account # | |
| FPN# | E08629 | | |

Site Description

Site Location

The Nebo-Hemphill Unnamed Production Oil Salvage abandoned oil production facility (EPA ID 30-E-1061) was referred to United States Environmental Protection Agency (EPA) on July 17, 2008, by the State of Louisiana to be considered for Oil Pollution Act (OPA) response actions. This facility is located in the Nebo-Hemphill Oil and Gas Field (Field ID 7040), approximately 6.6 miles south of Jena, in Section 038, Township 07 North, Range 03 East of LaSalle Parish, Louisiana. The facility is accessed from the west via Deville Hill Road off of Louisiana Highway (LA Hwy) 127.

Site Description

The facility consists of six above-ground storage tanks (AST) and one secondary containment area (CONT) located at one potential spill source (Source 1). Louisiana Department of Natural Resources (LDNR) records indicate that the facility received salvaged oil from area oil-production facilities, but was not associated with a specific well or lease.

Source 1 consists of three bolted-steel tanks, identified as AST1, AST2, and AST3, and two welded steel horizontal tanks, identified as AST4 and AST5, located in an eroded, breached, earthen-bermed secondary containment area, identified as CONT1, located at Latitude 31.590889 North and Longitude 92.139750 West. One bolted-steel tank, identified as AST6, is located 150 feet east of CONT1. AST6 has no discernible secondary containment. OA1, a 5-foot by 15-foot area of oil-saturated soil, is located below the west side of AST6.

Current Activities

The facility was visited on July 18 and 21, 2008 and a site reconnaissance was conducted at that time. The landowner provided access to conduct on-site activities. During the reconnaissance, the general condition of the facility and containers was evaluated to determine the volume of oil and oil emulsion present, and a preliminary assessment of substantial threat to navigable waters of the United States was documented using revised EPA Region 6 protocols.

Determination of Threat

LDNR records indicate that the contents of the surface components consist of salvaged oil in the form of oil, oil emulsion, and/or oily produced water. These fluids meet the definition of "oil" as defined by Section 1001(23) of the Oil Pollution Act, 33 United States Code (U.S.C.) § 2701(23). The surface components were not gauged during the reconnaissance, but their volumes were estimated by acoustic and thermal differential observations.

Drainage from Source 1 flows south and east down gradient (a 10-foot drop over 650 feet) to a National Hydrography Dataset (NHD) defined perennial tributary which is hydrologically connected to and forms a significant surface water nexus with Catahoula Lake. Catahoula Lake is navigable "in fact" and subject to interstate commerce. (See, site drainage map, included in the site reconnaissance file (SRF), attached at the website for this facility).

The condition of all the containers at Source 1 was deemed to be inadequate. Significant corrosion was present on the containers and connected flow lines. Oil and oil-saturated soil around the containers indicated prior discharges to the environment. The tanks were actively discharging their oily contents through seeps from delaminated metal at their bases. The secondary containment, where present, did not appear to be adequate to prevent oil releases from draining to adjacent waterways. The available capacity will need to be determined.

The FOSC has determined that a failure of the storage and process components through corrosion, vandalism or force majeure has a high potential to release a harmful quantity of oil within the meaning of Section 311 (b)(3) of the Clean Water Act, 33 U.S.C. § 1321(b)(3), and 40 CFR § 110.3(b), into the site drainage and ultimately into Catahoula Lake.

The EPA Region 6 FOSC has determined from his reconnaissance that Source 1 of this facility meets the revised Region 6 substantial threat criteria.

Planned Removal Actions

None.

Next Steps

Site Assessment (SA) activities will be conducted to obtain legally defensible field data that objectively quantifies and verifies the findings of substantial threat by the FOSC. If the SA sufficiently quantifies and verifies the findings of substantial threat by the FOSC, enforcement/administrative support will be necessary to build the administrative record and a cost recovery case for the site. These actions will be consistent with the criteria found in the U.S.C.G. NPFC Users Guide, July 2002.

POLREP No. 2 will outline results of the SA and advise of the EPA FOSC intentions for this abandoned facility.

If necessary, a Removal Project Plan (RPP) will be submitted to detail the planned corrective actions to address the substantial threat of discharge of oil to the navigable waters of the U.S., as defined in Section 311(a)(2) of Federal Waters Pollution Control Act (FWPCA), U.S.C. § 1321, 40 CFR Part 110.1 and Section 1001(7) of OPA, 33 U.S.C. § 2701(7), and 33 CFR 154.120, that is posed by this facility, as determined by the standard EPA threat analysis protocols, which are consistent with the criteria for determination of a substantial threat of discharge found in the U.S.C.G. NPFC Users Guide, July 2002.

Key Issues

Enforcement

All previous enforcement efforts have produced no timely or technically appropriate responsible party actions, as evident by the current conditions at the facility.

A deed and title search may be ordered to identify potential responsible parties (PRPs).

All of the attachments are available on the epaosc.net website as uploaded documents. Click on the hyperlink below to access the facility website to view the documents and photographs (images).

response.epa.gov/E08629