

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Friday, September 12, 2008

From: Mark Hayes

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

R6 PolRep OPA, Response and Prevention Branch

Subject: (FPN E08629) Nebo-Hemphill Unnamed Production Oil Salvage
Near Jena, LA
Latitude: 31.5912500
Longitude: -92.1398610

POLREP No.:	2	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 the 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 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.

Based on gauging, and surface soil core and field observations, the following volumes of oil waste were estimated to be present at Source 1 of the facility. AST1 through AST6 contain a total of 347.3 barrels (bbl) of oil and oil emulsion and 25.7 bbl of oily produced water. In addition, CONT1 has 63.9 bbl of pooled oil and CONT1 and OA1 have 46.4 cubic yards (yd3) of oil-saturated soil.

Previous Actions

The EPA Region 6 Federal On-Scene Coordinator (FOSC) conducted a reconnaissance of the facility on July 19, 2008 to determine if this facility meets the revised Region 6 substantial threat criteria. The FOSC has determined from his reconnaissance that Source 1 of this facility meets the criteria for proceeding with a Site Assessment (SA) (See. Minimum Threshold Checklist attached at the website for this facility).

Current Activities

On July 31, 2008, a SA was conducted by the United States Army Corps of Engineers (USACE) and their contractor, on behalf of the EPA, to document the condition of the abandoned facility. Access to

conduct on-site activities was granted by the landowner.

AST1 through AST6 were gauged and their conditions were documented. Container AST1 and AST6 were actively discharging their oily contents through seeps in corroded and delaminated metal at their bases. AST 2, AST4, and AST5 were actively discharging their oily contents through seeps in delaminated metal and/or failed joints on connecting flow lines. All containers at Source 1 had heavy corrosion at the lower tank sidewalls or on connecting flow lines. AST4 and AST5 were mounted atop 3-foot tall concrete stands.

The contents of AST1 through AST5 were sampled. Five samples were submitted for analysis using a modification of analytical method 8015B. This analysis is used to determine the presence of various volatile organic compounds and semi-volatile organic compounds by gas chromatography comparisons to various known refined and unrefined product standards. Subsequent analytical results indicated the samples were consistent with weathered crude oil.

The surface conditions of CONT1 and OA1 were documented. The local elevations were surveyed to determine the capacity of each containment area and the slope to the nearest drainage. Observation soil cores were also used to determine the extent of the oil saturation of the soil below ground surface (BGS).

Oily liquid seeping from AST1, AST2, AST4, and AST5 created areas of pooled oil and oil-saturated soil that covered the western and southern portions and the west half of the northern portion of CONT1. Soil cores revealed that oil-saturated soil extended to a maximum depth of 1.2 feet BGS in the southern portion of CONT1 and to 0.6 foot BGS in the remainder of the oil-impacted area. A prior release though a breach in the southern berm of CONT1 created a 20-foot by 30-foot area of oil-impacted soil south of CONT1. This area is included in the oil-impacted soil volume for CONT1. The landowner had shoveled dirt in that breach, but several additional shallow breaches were present along the southern berm of CONT1 which significantly reduced the containment capacity and allowed it to drain oily liquids to adjacent waterways. Lack of maintenance was evident from the eroding berms and the oil and oil-saturated soil in CONT1.

Oily liquid seeping through delaminated metal at the base on the west side of AST6 created a 5-foot by 15-foot area (OA1) of oil-saturated soil below the tank. Soil cores revealed that oil-saturated soil extended to a depth of 0.5 foot BGS.

Determination of Threat

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 attached at the website for this facility).

Based on the SA data, there are approximately 411.1 bbl of oil and oil emulsion, and 25.7 bbl of oily produced water that meet the definition of "oil" as defined by Section 1001(23) of OPA, 33 United States Code (U.S.C.) § 2701(23).

An actual and substantial threat of discharge was determined to exist by the Federal On-Scene Coordinator (FOSC) at Source 1. Containers AST1, AST2, AST4, AST5, and AST6 were actively discharging their oily contents through seeps from corroded and delaminated metal at their bases and on connecting flow lines. All containers at Source 1 have heavy corrosion at the lower tank sidewalls and on connecting flow lines. Due to their poor condition, catastrophic failure is imminent; meaning all tank contents will be released into secondary containment, where present. The berm of the secondary containment around containers AST1 through AST5 is breeched, reducing its holding capacity. The other container, AST6, has no secondary containment. As a result, 411.1 bbl of oil and oil emulsion and 25.7 bbl of oily water could drain from Source 1 and flow downgradient, ultimately impacting Catahoula Lake if action is not taken to mitigate this threat.

The FOSC has determined that the ongoing discharge (seeps) and/or 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 (CWA), 33 U.S.C. § 1321(b)(3), and 40 Code of Federal Regulations (CFR) § 110.3(b), into the site drainage and ultimately into Catahoula Lake.

Planned Removal Actions

None.

Next Steps

The SA and Enforcement Summary reports contain legally defensible field data that objectively quantifies and verifies the findings of substantial threat by the FOSC, and the enforcement/administrative support necessary to build the administrative record and a cost recovery case for the site. These actions are consistent with the criteria found in the U.S.C.G. National Pollution Fund Center (NPFC) Users Guide, July 2002.

POLREP No. 3 will advise of any potential responsible party (PRP) response or actions in response to the Notice of Federal Interest (NOFI), and 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

The last Operator of Record/ PRP has been identified through conveyance research as Doyle I. Deville (Operator Code 1478). 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 was conducted to identify any other PRPs. All identified PRPs will be sent a NOFI.

The EPA FOSC has formally offered the PRPs the opportunity to conduct the necessary mitigation actions to abate any potential sources of release at the site through issuance of a NOFI. If the PRP declines to participate, or fails to initiate a timely respond to notice, EPA plans to proceed with an Oil Spill Liability Trust Fund (OSLTF) financed cleanup action. The NOFI will clearly advise the PRP they may be subsequently held liable for the cost of government funded cleanup actions.

response.epa.gov/E08629