



## Quick Response Displays Southern Division's Capability

### PETROLEUM FACILITY NEAR CHARLESTON NAVAL COMPLEX



When a site has been declared “an imminent and substantial threat to human health and the environment”, a quick response is required to minimize the impact and remove the potential threat. SOUTHDIV along with the Response Action Contractor (RAC III), CH2MHILL Constructors, Inc., recently responded to an EPA request to remove over 89,000 gallons of fuel oil from a storage facility following a spill that entered the storm drain system. The EPA declared that the operator of the facility did not have the proper spill prevention, countermeasures, and controls to store fuel in accordance with federal regulations. The fuel was removed from Navy property; therefore, the Navy was a potential responsible party for the cleanup.

The objective of the mission was to remove the remaining fuel from the facility before future spills could occur.

#### Project Summary

SOUTHDIV and its RAC responded within hours of the EPA request as follows:

- On January 29<sup>th</sup>, after receiving a call from the EPA, SOUTHDIV met with the EPA at the site;
- On the morning of February 4<sup>th</sup>, EPA met with SOUTHDIV and requested that all the fuel be removed from the contractor's facility due to non-compliance with applicable laws and regulations, and the imminent and substantial threat to human health and the environment;
- On the evening of February 4<sup>th</sup>, the fuel was sampled at the facility to determine the proper disposal;
- Following a 24 hour turn-around from the lab, the removal and disposal of the fuel from the facility started on the morning of February 6<sup>th</sup>;
- Eighty-nine thousand (89,000) gallons of fuel were removed from the facility and the mission was completed on February 12<sup>th</sup>;
- On February 17<sup>th</sup>, the EPA inspected the site and stated that the task was completed.

#### Regulatory Requirements/Community Involvement

The requirement for this removal action was based upon the EPA declaring the site an imminent and substantial threat to human health and the environment. If the EPA had removed the oil from the facility using their resources, the cost to the potential responsible party could have been much greater. The Navy was a potential responsible party because the fuel was removed from the Navy property.

#### Construction Challenges

- The major challenge during the removal action was cooperating with the facility's owner and responding to EPA's timetable: Because the fuel was manifested properly during the removal from Navy property, the owner of the facility technically owned the fuel. It was therefore a challenge to get the owner to sign the manifest to properly remove the fuel from the facility.
- The EPA wanted to start removing fuel from the facility within 48 hours of declaring it an imminent threat.

<b>Site/Location:</b>	Petroleum Facility Charleston, SC
<b>Site Description:</b>	Fuel Oil Storage Facility declared out-of- compliance by EPA
<b>Team Contact:</b>	Gabriel L. Magwood Remedial Project Manager 843-820-7307  Marsha Robinson Contract Administration Manager, CH2MHILL, RAC III, (770) 604-9182 ext. 416
<b>Contaminant:</b>	Petroleum
<b>Action Levels:</b>	Prevent future spills of fuel
<b>Legal Driver:</b>	EPA Request based on SPCC Regulations, 40 CFR 112
<b>Decision Document:</b>	Completion Report

## Cost Avoidance Measures

The decision to perform additional analysis saved the Navy money:

- The initial samples taken showed high levels of total halogens, which is an indication of a hazardous waste.
- SOUTHDIV recommended to the RAC to perform a TCLP on all halogenated compounds that are regulated as hazardous waste and compare these results with the EPA limits.
- The analysis showed that all of the compounds were below the EPA limits and could be disposed of as off-spec oil and not as hazardous waste, which resulted in savings of tens of thousands of dollars.

## Project Successes

The project success was a result of good communication and teamwork:

- SOUTHDIV was in constant communication with EPA during the removal action.
- The exceptionally quick response from the SOUTHDIV RAC provided a level of comfort between the EPA and SOUTHDIV.

## Lesson Learned

This project emphasizes the importance of communication between all team members during a project:

- Each tier of subcontractors should be part of the communication during each stage of the planning process.
- Questions and concerns of tier subcontractors should be addressed and resolved during the planning stage before fieldwork begins.



**Figure 1:** *Sampling storage tanks.*



**Figure 2:** *Fuel in open pit not properly bermed.*



**Figure 3:** *Removing fuel from subcontractor facility.*