

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Roosevelt Drive Oil Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #20
Roosevelt Drive Oil Site
696
Derby, CT
Latitude: 41.3228000 Longitude: -73.0958000

To: Cathy Young, US EPA
William Lovely, EPA Region 1 - EPRB

From: Gary Lipson, OSC

Date: 7/12/2012

Reporting Period:

1. Introduction

1.1 Background

Site Number:	696	Contract Number:	
D.O. Number:	ERRS Task Order #: 0042	Action Memo Date:	
Response Authority:	OPA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	8/25/1994
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	014504	Reimbursable Account #:	01R0X08302D91CHRZ108

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

The site consists of a large warehouse type building which takes up the majority of the plot footprint on the eastern bank of the Housatonic River in Derby, CT. The facility, which was constructed along with an adjoining canal at the turn of the 20th century has served as a hydroelectric plant since its inception and currently houses two electric producing turbines which are powered by outfall from the canal located just across Route 34 (east of the building). Due to an increase of oil being released into the river when the turbines have operated in the past, these turbines are currently off-line at the request of the EPA and Connecticut Department of Environmental Protection. It is currently non-operational due to the continuing presence of subsurface oil migrating out from under the facility.

1.1.2.1 Location

The site is located on the eastern bank of the Housatonic River along Route 34 (140 Roosevelt Drive) in Derby, CT. The Site is bordered by the river to the west and south, Route 34 and a canal to the east and the Derby Cellular Products facility to the north. The site latitude and longitude is 41.3228 and -73.0958 respectively.

1.1.2.2 Description of Threat

The discharge of No.6 fuel oil product from the Site was first discovered to be impacting the Housatonic River in July 1994. An oil recovery system (Derby 1) was constructed in the fall and winter of 1994 and consists of an oil collection trench in conjunction with a recovery well. After contaminated soils and sediments were removed, this system was constructed on the south side of the structure where the impact to the river was first seen.

The No.6 oil impact to the subsurface and the Housatonic River was soon determined to be the result of a leaking underground oil pipe which connected a 20,000-gallon UST, located on the northern portion of the

Hull property, with an on-site pumphouse. A second oil recovery system (Derby 2) was installed in 1999, over and adjacent to this source area, consisting of a y-shaped trench, five recovery wells, and a ground water treatment system. Although the two systems are still operating and recovering subsurface oil, there is a continuing discharge of oil into the facility tailrace. The amount of oil entering the tailrace appears to be dependent upon the tidal influence. When the tide is low, there is less head pressure against the tailrace walls which allows oil to flow into the race. During the high tide phase, the additional pressure of the river water keeps the oil from seeping in. In recent years, a dam was constructed to physically separate the tailrace from the river and a tube skimmer installed to remove oil as it surfaces in the tailrace. The three recovery systems are still recovering a total of approximately 1,000 gallons of oil per year. The tailrace is still tidally influenced, but there is a lag time as the river water works its way through the mainly earthen dam. Although the dam and skimmer are keeping oil out of the river, it does not allow for continuing use of the two electric producing turbines which are powered by outfall from a canal located just across Route 34 (east of the building).

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

EPA's clean-up contractor, Environmental Restoration (ER), conducts operation and maintenance (O & M) activities approximately every three weeks at the site. Activities include repairing or replacing pumps, heaters, motors, belts, hoses, bag filters, meters, gauges, and computer software on the three existing oil recovery systems (Derby 1, Derby 2, and the tailrace belt skimmer) and transportation and disposal of collected oil. In addition, the timing and operation of the groundwater depression wells and skimmer belts are modified to take advantage of current site conditions.

During the summer of 2007, the OSC began working with the Tennessee Valley Authority (TVA), utilizing a Pollution Removal Funding Authorization (PRFA) to subcontract an engineer with expertise in horizontal well design. Since there was difficulty in installing traditional vertical wells due to the footprint of the building and the amount of concrete in the foundation, the engineer was tasked with designing a horizontal well(s) as a possible alternative for additional oil extraction.

After reviewing background information including existing well logs and recent well data, along with a series of newly installed observation wells, a series of on-site pump tests were conducted which allowed the engineer to develop a series of groundwater flow models. These models indicated that the placement of a horizontal well(s) at the correct elevation would change the groundwater flow pattern, redirecting the subsurface oil from the tailrace towards the new well.

Once the flow models were completed and there was sufficient evidence that a horizontal well would redirect the flow of oil and oily water away from the tailrace, the subcontracted engineer began to work on and has completed plans for installation of the well. The engineer has also designed a preliminary system for collecting, storing, and separating the oily water mix that is expected to be produced by the horizontal well.

The plans have been turned over to EPA's cleanup contractor who in June, 2012 placed a request for proposal (RFP) for directional drilling at the site. A site walk was held on July 11, 2012 for interested subcontractors where they were given the opportunity to see the site, ask questions, and begin to formulate bids for the project. Bids are expected to be received by July 20, 2012.

2.2 Planning Section

2.2.1 Anticipated Activities

EPA's cleanup contractor will soon begin site preparatory work in the location of the exit point for the horizontal well. This includes moving a number of large concrete blocks that had been previously placed to support part of an existing oil recovery system. As the well is being installed, most likely beginning in late summer, early fall of 2012, it is anticipated that the EPA's cleanup contractor will construct a temporary receiving vessel and work with the new subcontractor to tie it in with the well. The receiving vessel is being considered temporary to allow time to evaluate the discharge. After an appropriate evaluation period, a final receiving vessel with oil-water separation capability will be designed and installed.

Other ancillary construction activities will include blocking and draining the canal (complete with a bypass back to the river) and reworking the gates which allows water to flow from the canal to the turbines.

EPA is planning to end their involvement at this site once the horizontal drain and final receiving vessel, complete with oil-water separation, are installed and working efficiently. It is expected that the property owner will manage day to day operations of this drainage system with CT DEP oversight.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

The current Oil Spill Trust Liability Fund (OSTLF) ceiling for the Roosevelt Drive Site is \$8,947,800. The EPA OSC is updating the Oil Pollution Plan and will be working with the USCG NPFC who administers the fund to increase the ceiling. EPA is estimating that an additional \$1,000,000 will be necessary to complete the project.

The current ER task order balance is approximately \$500,000. This will be increased once the site ceiling has been raised.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
CT DEP PRFA	\$5,000,000.00	\$5,000,000.00	\$0.00	0.00%
TVA PRFA	\$120,000.00	\$100,000.00	\$20,000.00	16.67%
RST/START	\$71,400.00	\$53,000.00	\$18,400.00	25.77%
REAC	\$85,000.00	\$50,000.00	\$35,000.00	41.18%
ERRS (contract with Shaw E & I expired 09/30/08)	\$2,525,000.00	\$1,911,000.00	\$614,000.00	24.32%
ERRS (contract with ER LLC began on 10/01/08)	\$775,000.00	\$275,000.00	\$500,000.00	64.52%
Intramural Costs				
USEPA	\$300,000.00	\$170,000.00	\$130,000.00	43.33%
Total Site Costs	\$8,876,400.00	\$7,559,000.00	\$1,317,400.00	14.84%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

As stated earlier in this POLREP, the only current site activity is O & M on a periodic basis. The ERRS contractor typically utilizes one or two field technicians and potentially a supervisor to conduct these tasks.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.