

Plains Marketing, L.P.
Stevens Facility Release
Observations and Maintenance Plan

Plains at Stevens Facility Release Clarke County, Mississippi Observations and Maintenance Plan

Unified Command

Leo Francendese (EPA) _____ date _____

Ernie Shirley (MDEQ) John Mark Francendese for Ernie Shirley date 9-24-14

Duane Nottingham (Plains Marketing, L.P.) D. Nottingham date 9-24-2014

Prepared by C K Associates



From: [Francendese, Leo](#)
To: John_Henderson@deq.state.ms.us; [Allan R Schoen](#)
Cc: John_Henderson@deq.state.ms.us; [Duane D Nottingham](#); [Warren D Fusilier](#); [Tre Wharton](#); [Mickey Harkins](#); [Jeffrey P Dann](#); [Ernie Shirley](#)
Subject: [WARNING: ATTACHMENT UNSCANNED]Re: O&M Plan Submittal 'Plains at Stevens Facility Oil Spill'
Date: Wednesday, September 24, 2014 1:29:39 PM

Concur
Pls make public.

Alan

What do we have outstanding that needs to be to done or made public.? I think we are good but figured Id check

Thanks

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From: John_Henderson@deq.state.ms.us
Sent: Wednesday, September 24, 2014 11:20 AM
To: arschoen@paalp.com
Cc: Francendese, Leo; John_Henderson@deq.state.ms.us; [Duane D Nottingham](#); [Warren D Fusilier](#); [Tre Wharton](#); [Mickey Harkins](#); [Jeffrey P Dann](#); [Ernie Shirley](#)
Subject: Re: O&M Plan Submittal 'Plains at Stevens Facility Oil Spill'

Approved

John Mark Henderson
Emergency Services
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From: Allan R Schoen <arschoen@paalp.com>

Plains at Stevens Facility Release Clarke County, Mississippi Observations and Maintenance Plan

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Leo Francendese (EPA) _____ date _____

Ernie Shirley (MDEQ)) _____ date _____

Duane Nottingham (Plains Marketing, L.P.) _____ date _____

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1.0 Introduction

This plan was prepared at the request of the Unified Command (UC) for the “Plains at Stevens Facility Oil Spill” as part of response and extended duration remediation. The purpose of this Observations and Maintenance (O&M) Plan is to describe the techniques and resources to be used in remediation; to describe monitoring and reporting requirements; and to describe the change in requirements as allowed by the UC.

The release occurred as a truck was loading oil from a storage tank. Sixty barrels (according to meter) of API 39 gravity oil were spilled. Three operational divisions, based on landform and recoverable oil, were defined during the initial phase of response (Figure 1).

The oil was spilled adjacent to an upland pasture (Division A). The slope of the area coupled with low permeability / infiltration capacity of the soils resulted in the majority of the oil flowing down gradient to an adjacent ephemeral stream bed (Division B). Based on visual assessment of soil samples and one deep trench (4 ft) the oil did not appear to saturate more than the top 3 inches of soil in Zone A or B.

The oil moved down gradient within the ephemeral channel before being deposited in an area with standing water (Division C). This area is in the upper-most section of the Bogue Homo – Shubuta Creek Watershed (Hydrologic Unit Code 031700020203). The oiled area in Division C has a narrow (< 5 feet) poorly defined channel surrounded by a mixture of emergent (mostly cattail) and shrub/scrub wetlands. There were isolated hummocks of shrub/forested wetlands within Division C that had no observable oil (NOO) and these areas were avoided during bulk removal to prevent oiling by foot traffic or equipment. The majority of the oil released floated on the surface of the water in Division C.

Following the manual removal of oiled vegetation and debris (grass clippings, thatch, leaf litter), low volume and pressure water flushing was utilized in Division A. A small earthen dam (< 2 ft high) was built and a vacuum pump used to remove oily water down gradient of release and up-gradient of Zone B. Following bulk removal of oil in Division A, Oil Gator® was applied across the entire oiled area and mechanically tilled into the soil to a depth of approximately 6 inches. The following day additional Oil Gator was applied to small areas (< 2 ft diameter) of visibly oiled soil/grass stubble and the entire area was tilled again.

In Division B, oiled debris (leaf litter, twigs, pine straw) within the stream channel was manually removed. Very little oil was observed in the channel and what was observed was in areas of root channels and cavities. Following manual remove of oiled debris Oil Gator® was applied to the entire length of the ephemeral channel and gently raked into the surface.

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In Division C, the oil was confined to an area of standing water. Both, hard and absorbent boom were deployed at the most upstream and downstream end of the area with visible oil.

Environmental unit staff surveyed up-gradient and downstream of the hard boom/sorbent boom and found no observable oil (NOO) or sheening outside of Division C.

Oiled vegetation and debris were removed manually from Division C. Hard boom was used within the area to enclose oil and backpack leaf blowers were used to push floating oil toward gathering points. Vacuum trucks were used to remove floating oil. Following removal of floating oil the channel / wetland margin was lined with absorbent snares. Oil Gator® was applied to exposed sediment that was oiled due to the drawdown of the water between the booms due to vacuum operations, along areas that were oiled due to foot traffic, and along the paths where vacuum lines were deployed. The Oil Gator was tilled into the soil/muck to a depth of approximately 3 inches using small blades attached to weed-eaters.

After bulk oil removal and application of Oil Gator, sorbent fabric fence was installed encircling Division C and along a line between Divisions C and B. This sorbent fence was installed to prevent floating oil from penetrating unoiled areas in the event of a rise in water level.

The nature of the movement and collection of contaminant from the Stevens Spill will likely vary over time as weather and on-site conditions change, therefore this O&M Plan is subject to an adaptive management strategy as approved by the UC. This will allow Observations and maintenance the ability to adjust as necessary to remove, contain, and minimize potential impacts of contaminants.

Plains Marketing, L.P. or designee will be responsible for observations, maintenance, monitoring, and reporting to the UC. UC will collectively determine the appropriate time to lower the frequency of O&M activities, monitoring and reporting. The UC may use its discretion to keep a specific Division in a higher frequency O&M stage.

2.0 Records and Reporting

Plains will designate an Operations person who will be responsible for documenting the observations and maintenance in each of the three Divisions at each monitoring event. The Operations person will collect data from maintenance activities. Plains Marketing, L.P. or designee will compile into a report. The report will be submitted to UC for review.

The Operations person will notify prior to scheduled site visits. The Operations person and RPR will be responsible for recording the following information during routine O&M phase site visits:

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- Date
- Time
- Division
- Specific area/station within Division
- Description of current conditions at area/station
- Actions and maintenance operations performed at area/station
- Before and after photos of any maintenance operations performed
- Disposal manifest for waste removed

This information will be documented and included in reports to UC. The RPR will be responsible for compiling records of O&M activities into a report. This report will be submitted to UC within 48 hours of completion scheduled maintenance activities or

3.0 Observations & Maintenance

The following information details the activities that will take place during the O&M phase.

Visual surveys of each of the three Divisions will occur daily for one week beginning September 21, 2014. After this date, Division surveys will be conducted weekly or after a rain event of ½ inch over a 24 hour period through October 3, 2014. A rain gage has been installed adjacent Division A (N 31.98949 W -88.836225).

Provided there is no evidence of heavy sheens after ½ inch rainfall (predicted for September 27, 28, and 29) adsorbents will be removed from Division C on or after October 3, 2014. Hard and adsorbent booms will remain in place at least through October 17, 2014.

Periodic monitoring may continue as directed by the UC following specified events.

3.01 Personnel

An Operations person will check the rain gage daily and dispatch field crews as needed. The Operations person will provide support and direction to the crews and document maintenance activities.

3.02 Materials and Equipment

- Required PPE
- Sock Booms
- Snares
- Oleophilic Fabric
- Absorbent Pads
- Bags
- Oil Absorbent
- Hand Tools
- Trucks
- Trailers
- UTV or ATV

3.03 Staging Areas and Access

The existing access roads and staging areas will support all expected activities of the O&M plan. One roll-off box and one frack tank will be staged at the tank battery for waste storage until all materials have been removed. Equipment, vehicles and O & M supplies will be transported to the site as needed.

3.04 Waste Removal and Disposal

Any liquid wastes removed from the site will be treated and disposed by Liquid Environmental Solutions, Mobile Alabama. Impacted solid waste will be disposed of at Pine Ridge Landfill in Meridian, MS. The solid waste will be stockpiled in the roll-off box on site until disposal is needed. Waste manifests will be kept for records of disposal.

3.05 Evaluation of Vegetative Regrowth - post response

Environmental staff and representatives from Mississippi DEQ evaluated site conditions on September 19, 2014. Based on observations of vegetation cut back or disturbed during recovery operations in Division C, Mississippi DEQ requested that an evaluation of vegetative regrowth be conducted in this area in early spring 2014. Plains Marketing, L.P. and/or designee will coordinate with the State On-Scene Coordinator to meet this request. Field observations of

vegetative regrowth and general site conditions will be documented and submitted in a written report to UC.

4.0 General Activities

Oil absorbent will be applied to ground areas with persistent signs of recoverable oil, or areas that show new signs of leaching following rain events. Sorbent snares and sock boom will be replaced as necessary.

5.0 Health and Safety

All activities during the O&M Phase will be conducted following the Site Safety and Health Plan published on the EPA OSC website for the Stevens Oil Spill.

http://www.epaossc.org/site/site_profile.aspx?site_id=9519

6.0 Milestones of Increased/Decreased O&M Frequency

7.0 Revisions to O&M Plan