



CENTER FOR TOXICOLOGY
AND ENVIRONMENTAL HEALTH, LLC

Biodiesel Release

Greenville, MS

Operations/Maintenance Plan

Prepared On Behalf Of:
United States Environmental Services (USES)

Prepared By:
Center for Toxicology and Environmental Health, L.L.C.
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1.0 Introduction

This Work Plan has been prepared by Center of Toxicology and Environmental Health, L.L.C. (CTEH®) on behalf of United States Environmental Services (USES) to address a biodiesel release that occurred at the intersection of Lillie Street and Highway 82 in Greenville, Mississippi on August 17, 2015. USES is undertaking this action on behalf of Jones Liquid Transportation, the Responsible Party under the Clean Water Act and Oil Pollution Act.

1.1 Emergency Response Containment and Recovery

Currently, USES has:

- Transferred remaining product from the tank.
- Constructed a dam at the end of the slough
- Begun recovering product from the slough (at the dam)
- Off-loading product and water from the slough into frac tanks (2 onsite)
- Approximately 3000 gallons of product has been transferred from the tank
- Approximately 3200 gallons of product has been recovered from the release site.
- Approximately 30,000 to 40,000 gallons of oily water mixture is contained in the two frac tanks onsite.

The following sections will detail remediation and monitoring of the release site and in order to achieve a No Further Remedial Action (NFRAP) Letter from the Mississippi Department of Environmental Quality (MDEQ).

2.0 Proposed Remedial Action

USES will build an under flow dam to contain free floating oil. This will allow uncontaminated water to pass through the dam. Sock boom will be placed on either side of the dam in order to contain the area and prevent further impacts to the area. This will signify the start of the Operations and Maintenance phase of recovery operations.

2.1 Collection and removal of free product

An underflow dam will be constructed along the drainage pathway to promote active recovery of free product and to prevent migration down gradient from the release. USES will continue to conduct visual observations to check for free product. Inspections will be performed within 24 hours of a rain event in the local area (>0.5 inches) or once a week at a minimum for the first month. The inspection cycle may be altered by MDEQ based on the progress of natural attenuation in the slough. USES will provide a courtesy call to MDEQ 24 hours prior to any scheduled inspection and as soon as possible for any inspection following a rain event.

In the event that free product is observed, USES, in consultation with MDEQ, will utilize vacuum trucks, absorbent boom and/or snares to collect and remove product from the slough. The inspections will continue until no free product is observed or MDEQ agrees no further maintenance is required. In all cases, free product and impacted environmental media will be removed upon discovery and properly containerized/managed for disposal.

2.2 Containment Boom and Absorbent Snare Maintenance

USES will maintain containment boom and absorbent web polypropylene snares located down gradient of the release site until evidence of free product is no longer present in the impacted portions of the drainage ditch and slough and MDEQ agrees that no further maintenance is required. In the event of a significant rain event (> 0.5 inches), USES will conduct an additional check if necessary to ensure the boom and snares are still in proper position. USES will change out contaminated boom and snares as needed. Contaminated boom and snares shall be characterized and disposed properly.

Once it is agreed by USES and MDEQ that the boom or snares are no longer necessary, they will be removed from the release site and sent for disposal at an approved facility.

3.0 Restoration

Upon completion of the work at the release site, USES will restore any offsite areas including grading and re-vegetation, as necessary.

4.0 Summary Report

Following the completion of the project, CTEH® and USES will prepare a Summary Report detailing the remedial action completed for the Site. The report will include a summary of the actions taken, a review of the analytical results, and copies of the waste disposal receipts.

Based on the final results, the Summary Report will include recommendations for future work, describe the procedures for recording land use restrictions, and/or a request for No Further Remedial Action from MDEQ.

We, the Unified Command for the response agree to implement this document.

Charles Berry
EPA Federal On-Scene Coordinator

Lindsay Ferrell
MDEQ State On-Scene Coordinator

David Burford
Washington County EMA Director

Tim Butler
Responsible Party Representative