DECLASSIFIED
Gloria Flores
9/22/16

Enforcement Sensitive - Falcon Refinery Site Visit: January 14, 2015

On January 14, 2014, OSC Moore conducted a Site Visit. OSC Moore was informed that a company by the Name of Gulf Coast Asphalt Company was delivering crude oil into Tanks 16 and 13 by truck and shipping such oil by Barge. This company started operations on or about February 2014 and continues to operate.

Additionally, it appeared that another company, Thomas, was using Tank 15 for the purpose of storing diesel. It appeared that this storage has ceased as the manway was only bolted on by 2 bolts.

I am not sure the status of any FRP/SPCC Plans for the operations of the on-site tankage. I will need to confer with EPA Oil Program Staff.

The Action Memo scope of work includes the following activities:

- The primary intent of the removal action is to dispose of source materials.
- Asbestos Inspection and Abatement: It will be necessary to conduct an Asbestos Inspection prior to the conduct of demolition activities to insure that asbestos is not being disturbed in the conduct of this action.
- Assessment and Removal of Hazardous Substances, or Pollutants or Contaminants: The materials will be tested to determine the appropriate disposal technique. It appears that much of the material can be recycled. Previous field testing indicates that the majority of the materials appear to be non-hazardous waste.
- Decontamination of Containers, Equipment, Piping, and Buildings: If it is determined necessary to demolish the structures or portions thereof, these structures will be decontaminated to the extent necessary for the purposes of recycling or disposal.
- Removal of Containers, Equipment, Piping, and other Contaminated Items: The removal and disposal of the tanks, equipment, and piping will only be necessary if the source materials cannot be adequately removed so as to prevent exposure to trespassers from residual hazardous substances that would otherwise be left behind. In addition, it is anticipated that the removal and recycle or disposal of the tanks, equipment, piping, and other items will allow an unabated investigation of the surface and subsurface soil contamination that would otherwise be inaccessible. The metal debris associated with the removal of the tanks, equipment, piping, and other items will be recycled to the extent practical and any proceeds will be credited to the response.
- Consolidation, Removal and Disposal of Grossly Contaminated Soil: Due to the high weeds it was difficult to do a complete survey of the facility to identify visibly contaminated soils. As response actions are conducted, it is anticipated that contaminated soils will be uncovered and will need to be addressed. It is anticipated that there will be a need to consolidate, and dispose of contaminated surface soils resulting from historical spills.

The Superfund Removal Action must complete the applicable tasks listed above but the current major activities necessary to be completed is the removal/disposal of the contents of Tanks 7, 12, 26, 30 and Butane Tank. The wastes in these tanks is not adequately secured to prevent release of such wastes into the environment as the tanks have openings which would allow such wastes to discharge to the environment. Additionally, these tanks are of questionable integrity making it susceptible to failure and

catastrophic release of such wastes which could enter the environment and result in contamination of the environment and exposures to humans and wildlife.

Tank 7: Notice only 2 manway bolts would indicate tank material removed and only water is still in tank about ¾ way up the manway.

Tank 12: Tank with open manway. Appeared that it was about 6 – 12 inches of water.

Tank 26: Insulated Tank – Volume of material in tank is unknown

Tank 30: Big Hole in Tank with about 2 feet of Sludge and Water and portion of floating roof on the floor.

Tank 30: Interior view of Tank showing sludge and water and fallen portion of floating roof.

Butane Tank: Became a minor issue during Superior Crude spill when it was notice leaking. Supposedly has some thick hydrocarbon material in it.