

ETHYL CORPORATION

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ETHYL TOWER
431 FLORIDA
BATON ROUGE, LA. 70801

LAW DEPARTMENT

February 12, 1988

RECEIVED

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LA. DEPT. OF
ENVIRONMENTAL QUALITY
IAS DIVISION

Mr. William B. DeVille
Administrator
Inactive and Abandoned Waste Sites Division
Department of Environmental Quality
P. O. Box 44307
Baton Rouge, LA 70804-4307

Dear Mr. DeVille:

RE: Combustion, Inc. Site Monitoring

The Louisiana Department of Environmental Quality has asked that the Combustion, Inc. site have a caretaker to operate the pumps and inspect the property and that the Pond area outfall be monitored. ERM-SW of Metairie, LA, is providing these services, which commenced on January 13, 1988.

ERM-Southwest has hired Mr. Carter L. Harris of Baton Rouge for the primary caretaker position. Mr. Harris' resume is enclosed. As an ERM-Southwest employee, Mr. Harris will serve as caretaker of the site and perform routine (daily) inspections, monitoring and minor maintenance generally described in the Combustion, Inc. Site Monitoring Plan (attached), previously prepared by ERM-Southwest and submitted to your office. It is estimated that Mr. Harris will spend an average of about 15 hours per week at the site. However, the amount of time required on site by the caretaker will vary depending on the amount of rain and the occurrence of investigative studies at the site. A preliminary list of caretaker activities at the site is given in Table I.

Mr. Harris has an industrial background which well qualifies him for these activities; see Table II. In addition, Mr. Harris received 40 hours of pertinent classroom training in Norman, Oklahoma on January 4-7, 1988 from ERM-Southwest. This training was specific to hazardous waste site management and was directed to meet the OSHA requirements of 29 CFR Part 1910.120. Mr. Harris has also received additional training from ERM-Southwest specific to activities at the Combustion, Inc. site.

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During this interim period, some of the PRPs have assisted Combustion, Inc. and the LaDEQ in providing a caretaker at the Combustion, Inc. site in a spirit of cooperation with the LaDEQ to protect human health and the environment and to promote clean-up of the site. This voluntary assistance by the Participating Parties is by no means an admission of liability for the clean-up of the site by the Participating Parties.

Sincerely,



D. C. Bach
Assistant Counsel

DCB:cmc
Attachments
1753E

cc: Harold Ethridge, LaDEQ
David Hughes, LaDEQ
Elizabeth Megginson, LaDOJ

TABLE 1

CARETAKER ACTIVITIES
COMBUSTION, INC. SITE

- o Activation of the stormwater pumping system during significant rainfall events.
- o Maintenance of the stormwater pumps including pump priming, unclogging and/or motor changeout.
- o Level monitoring of the stormwater receiving tank.
- o Inspection of the stormwater transfer line to the Pond Area.
- o Daily inspections of the Pond and Process Areas, including completion of a weekly inspection report. The caretaker will document the daily inspections in an inspection log book and will complete a somewhat more formal inspection report form on a weekly basis. Copies of the available inspection reports will be submitted to DEQ along with reports on the analytical results.
- o Sampling of Pond Area discharge and delivery of samples to laboratory.
- o Notification of spills, fire, security or other emergency events to proper authorities.
- o Arrangement for and implementation of emergency pumping capacity (such as rental and deployment of a gasoline engine driven pump) for stormwater in the event of power or pump failure.
- o Clearance of underflow drains as needed to assure proper operation of the ponds.
- o Assistance with implementation of emergency containment of potential or actual oil releases from tanks or impoundments.
- o Other duties assigned by ERM-Southwest's Project Manager, as appropriate.

TABLE II
PERSONAL RESUME

Carter L. Harris
9669 Mollylea Drive
Baton Rouge, La. 70815
(504) 924-6991

JOB OBJECTIVE

Desire challenging position in Occupational Safety and Health or Safety & Loss Control. Other positions which could utilize experience.

EDUCATION

High School Graduate

Accredited College Courses: Industrial Supervision, Industrial Fire Training, Safety Management, Respiratory Protection (NIOSH), OSHA Regulations.

Management Training: Safety Training & Accident Prevention, Interaction Management, Managing Accident Prevention, Fair Employment Practice, Staying Union Free

PROFESSIONAL
ACTIVITIES

Member American Society of Safety Engineers, International Society of Fire Service Instructors, Geismar Area Mutual Aid Organization, Greater Baton Rouge Industrial Management Safety Committee.

SKILLS

Experience in various Chemical Processes and Process Operations as Operator/Production Technician, Shift Supervisor, Production Supervisor, Maintenance Supervisor, and Safety Coordinator.

EXPERIENCE

12/84 to Present

; Independent

Contractor

Self Employed - Working out of home, called on all businesses that accepted the providing service, supplies, placing promotional materials and application displays. Worked from a computerized route list which was revised and updated for return to .. Organized own work & materials, hours and schedule. Area of responsibility; Central Louisiana.

3/76 to 9/84

Chemical Co. , St. Gabriel, La.

Safety Coordinator (11/78 to 9/84)

Administered the the Plant Sarety & Loss/Training Programs, assisted plant personnel in meeting plant Safety/Training standards, monitored safety compliance, conducted plant safety inspections and safety audits.

Shift Supervisor (3/76 to 11/78) - Supervised 11 shift Production personnel, performance evaluations, plant operations and production of various chemicals, safety & training, supervisor of emergency team.

1/75 to 3/76

Self Employed - Owner/operator of General Merchandise Store

6/67 to 12/74

Chemical Company, Geismar, La.

Plant Maintenance Superintendent (7/71 - 12/74)

Management and direct supervision of all plant maintenance including manpower, equipment, materials, maintenance contractor, planning & scheduling, and annual turnarounds.

Process Supervisor (6/67 to 6/71) - Supervised 12 shift production personnel, plant operations and production of various intermediate chemicals; included startup of the Geismar facility 1967-68

7/59 to 6/67

Chemical Company, Baton Rouge, La.

Shift Foreman (1963 - 6/67)

Plant Operator - (1959 - 1963)

Steam/electrical generation and water treatment

1959 and Prior

Construction Ironworker - 2 years

Calculating Machine Technician - 4 years

U. S. Navy - 5 years - Communications

PERSONAL DATA

Date of Birth: 2/19/31

Height: 5'10 1/2" Weight: 193 lbs.

Married, two children (both married)

REFERENCES

Available upon request

-DRAFT-

COMBUSTION, INC. SITE MONITORING PLAN

Prepared for:

Combustion, Inc. Participating Parties

W.O.# 85-03

November 30, 1987

Nicholas W. Hollingshad, P.E.

Michael E. Pisani, P.E.
Principal

Prepared by:

ERM-SOUTHWEST, INC.
3501 N. Causeway Boulevard
Suite 200
Metairie, Louisiana 70002
(504) 831-6700

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1 - INTRODUCTION

The purpose of this report is to propose an approach for addressing the following issues raised by DEQ, EPA, and the Louisiana Department of Justice in a September 4, 1987 meeting with the Combustion, Inc. Participating Parties:

- o Monitoring of the outfall from the Pond Area,
- o Regular site inspections/surveillance,
- o Contingency planning, and
- o Process Area stormwater management.

This report outlines the steps that will be taken by the Combustion, Inc. Parties to address these items. Performance of this work by the Combustion, Inc. Participating Parties is being undertaken at the agencies' request and is not intended to imply that the activities outlined herein are necessary to protect human health and the environment at the site.

2 - POND AREA DISCHARGE MONITORING

2.1 Sampling and Analytical Program

The discharge from the Pond Area contains runoff from the Pond Area and also runoff pumped from the Process Area.

The proposed sampling and analytical program will include collection of a monthly grab sample of the Pond Area discharge water and analysis of the sample for the following parameters:

- Total Organic Carbon
- Oil and Grease
- pH
- PCB's
- Total Lead
- Five-day Biochemical Oxygen Demand (BOD5)
- Priority Pollutants by GC/MS:
 - Volatile Fraction
 - Base/Neutral Fraction
 - Acid Extractable Fraction

These analyses include widely recognized general indicators of the discharge water quality, and will also determine if materials present in the ponds are also present in the discharge water. It is understood that DEQ may request additional sampling in case of an unusual event at the site or if the analytical results indicate significant change in conditions at the site.

2.2 Quality Assurance/Quality Control

EPA-approved sample collection procedures will be used along with analysis of field blanks at the start of the program and semi-annually thereafter to ensure adequate quality assurance and quality control (QA/QC). Laboratory QA/QC procedures can be provided on request following selection of the analytical laboratory.

2.3 DEQ Oversight

To facilitate DEQ oversight and to allow DEQ the opportunity to split samples, DEQ will be notified at least two days in advance of the date and approximate time of each sampling event. If the sampling schedule is changed (e.g., due to inclement weather), the sampler will attempt to notify DEQ before the scheduled sampling time. This notice is intended

to prevent an unnecessary trip by DEQ personnel in the event the sampling must be delayed.

2.4 Reporting

A brief report of the analytical results will be prepared and submitted to DEQ within three weeks of receipt of the final analytical results from the laboratory.

3 - SURVEILLANCE AND SITE MAINTENANCE

Maintenance and surveillance of the Combustion, Inc. site consists of stormwater pumping and periodic inspections of the facility. Required maintenance has typically been provided by a local resident with knowledge of the site and operation of the stormwater pumping system. The purpose of this section is to describe the responsibilities of the site caretaker and to describe minimum qualifications for the caretaker.

3.1 Caretaker Responsibilities

Responsibilities of the site caretaker are as follows:

1. Activation of the stormwater pumping system during significant rainfall events.
2. Maintenance of the stormwater pumps including pump priming, unclogging and/or motor change out.
3. Level monitoring of the stormwater receiving tank.
4. Inspection of the stormwater transfer line to the Pond Area.
5. Daily inspections of the Pond and Process Areas, including completion of a weekly inspection report, as described in Table 3-1. The caretaker will document the daily inspections in an inspection log book and will complete a somewhat more formal inspection report form on a weekly basis. Copies of the available inspection reports will be submitted to DEQ along with reports on the analytical results (see Section 2.4).
6. Sampling of Pond Area discharge and delivery of samples to laboratory.
7. Notification of spills, fire, security or other emergency events to proper authorities.
8. Arrangement for and implementation of emergency pumping capacity (such as rental and deployment of a gasoline engine driven pump) for stormwater in the event of power or pump failure.

TABLE 3-1 .

REGULAR SITE INSPECTIONS
COMBUSTION, INC.

PROCESS AREA

- o Visual inspection of each tank for leaks
- o Visual inspection of tank dike
- o Visual inspection of ground inside fence for stains, trash, etc.
- o Walk fenceline, inspect for damage or any sign of unauthorized entry
- o Check lock on gate
- o Visual inspection of nearby drainage ditches for evidence of discharge from the site

POND AREA

- o Visual inspection of pond dikes
- o Visual inspection for signs of overflow
- o Walk fenceline, inspect for damage or any sign of unauthorized entry
- o Check locks on gates
- o Check condition of monitor wells
- o Visual inspection of discharge and creek (upstream and downstream of discharge point)

9. Clearance of underflow drains to assure proper operation of the ponds.
10. Assistance with implementation of emergency containment of potential or actual oil releases from tanks or impoundments.

3.2 Caretaker Qualifications

Performance of the responsibilities listed in Section 3.1 requires the following minimum qualifications:

1. Located within ten miles of the site to provide prompt response to stormwater events.
2. Knowledge of pumping system repairs.
3. Home telephone.
4. Literate.
5. Own transportation.
6. Able to perform physically demanding activities.
7. No conflicts of interest relative to the site litigation.

3.3 Caretaker Training

Prior to assumption of any of the duties outlined above, the caretaker will be trained by the Participating Parties or their representative. The primary objective of this training is to ensure that the caretaker can fulfill his responsibilities in a safe manner. The training will encompass discussions, written instructions, and onsite field demonstrations (as appropriate) for handling any situations the caretaker could reasonably be expected to encounter in executing his responsibilities as described in Section 3.1 above. The training will also be designed to meet the requirements of Section 1910.120 of OSHA. General areas the training will cover include but are not limited to:

1. General site information
Site layout and process flow, materials present and their location, relevant properties of materials present, security, site access, etc.

2. Personal safety
Personal protective equipment and its proper use, personal hygiene practices, decontamination, etc.
3. Emergency procedures
Procedures for notification of spills, fire, dike failure, trespass, vandalism, etc. to proper authorities.
4. Operating procedures
Operation and maintenance of stormwater pumps, source of backup pumps in case of pump or power failure, underdrain maintenance in Pond Area, etc.
5. Sampling procedures
Sample containers, sampling equipment, field quality assurance, sample collection procedures, sample tagging, chain-of-custody.
6. Inspection procedures
Tasks, field log book, weekly inspection reports, prompt notification of unusual/suspicious events and observations..

4 - CONTINGENCY PLANNING

A written Contingency Plan will be developed and submitted to DEQ/EPA for approval. This plan will outline steps that the Participating Parties, DEQ, a site caretaker (if present) and/or other appropriate party could take to quickly mobilize the necessary resources to respond to an emergency at the site. The plan could be distributed to all emergency response personnel that would potentially be involved in an emergency at the site (DEQ, State Police, Livingston Parish Sheriff and Police Jury, local Fire Department, etc.). A proposed outline for the Contingency Plan is shown in Table 4-1. General responses to potential contingencies are discussed below.

4.1 Fire

The primary response would come from local firefighting organizations, with support from other appropriate authorities (DEQ, State Police Hazardous Materials Unit, etc.).

4.2 Major Tank Leak

In addition to the State and local emergency response authorities, the Contingency Plan would include phone numbers for several oil spill cleanup contractors. These contractors have equipment (such as a backhoe, absorbants, booms, vacuum trucks, etc.) that can be moved quickly to the site and also have experienced personnel that can deploy the equipment properly. Onsite supervision of the contractors will be provided by the Participating Parties or their representative.

4.3 Pond Overflow/Dike Failure

The general response action would be as described in Section 4.2 above. In addition, a source of clean fill dirt will be identified in the Contingency Plan for use in repairing a pond dike.

4.4 Pipeline Leak

Any observed pipeline leak would be repaired as soon as weather permits.

TABLE 4-1

PROPOSED OUTLINE FOR CONTINGENCY PLAN
COMBUSTION, INC.

I. Quick Reference

[Primarily phone numbers to call immediately]

II. Site Description

- Site location [include maps, plot plans]
- Materials present [quantities of oil, water, solids, and general characterizations relevant to emergency response activities]

III. Notification Procedures

[Who to notify and under what circumstances]

IV. Potential Contingencies

- Fire
- Major Tank Leak
- Pond Overflow/Dike Failure
- Pipeline Leak