

**EPA Superfund
Explanation of Significant Differences:**

**OLD INGER OIL REFINERY
EPA ID: LAD980745533
OU 01
DARROW, LA
09/12/2006**



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

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SUPERFUND DIV.
DIRECTOR'S OFC.

August 25, 2006

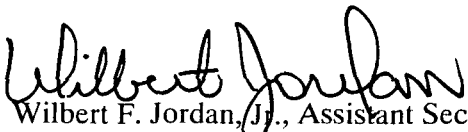
Mr. Samuel J. Coleman, P.E.
U.S. EPA Region 6, Superfund Division (6SF)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Final Close Out Report, Explanation of Significant Differences
Old Inger Oil Refinery Superfund Site, **AI Number 4714**
LA Hwy 75, Darrow
Ascension Parish, Louisiana

Dear Mr. Coleman:

Enclosed are signed copies of the above referenced reports, indicating our concurrence with their content. Thank you for your assistance in incorporating comments and documentation of institutional controls into these documents. If you have any questions, please contact Ms. Laurie Peacock of my staff at 225-219-3412 or by email: laurie.peacock@la.gov.

Sincerely,


Wilbert F. Jordan, Jr., Assistant Secretary
Office of Environmental Assessment

/lkp

Enclosure

c: Imaging Operations, Inactive and Abandoned Sites
Laurie Peacock, ETD-GG3



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Explanation of Significant Differences

**Old Inger Oil Refinery Superfund Site
Ascension Parish, Louisiana**

**United States Environmental Protection Agency
Region 6**

Superfund Division

September 2006

Concurrence page

**CONCURRENCE PAGE FOR THE OLD INGER
SUPERFUND SITE
EXPLANATION OF SIGNIFICANT DIFFERENCES**

Document prepared By:

EPA Region 6

Remedial Project Manager:



Bartolome J. Cañellas (6SF-LP)

8/18/06
Date

Concur By:

EPA Region 6

Site Attorney:



Gloria Moran (6RC-S)

9/5/06
Date

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Regional Counsel:

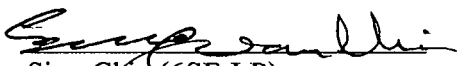

Mark Peycke (6RC-S)

09/07/06
Date

Concur By:

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LA/OK Section Chief



Sing Chia (6SF-LP)

9/11/06
Date

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LA/OK/NM Branch Chief:

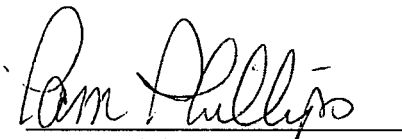

Wren Stenger (6SF-L)

9/11/06
Date

Concur By

EPA Region 6

Deputy Director, Superfund Division Pam Phillips (6SF-)


Pam Phillips (6SF-)

9/12/06
Date

I. INTRODUCTION

Site Name: Old Inger Oil Refinery
CERCLA Id No.: LAD980745533
Site Location: Between Louisiana Highway 75 and the Mississippi River levee, Ascension Parish, Louisiana, 4.5 miles north of Darrow.
Lead Agency: Louisiana Department of Environmental Quality (LDEQ)
Support Agency: U.S. Environmental Protection Agency, Region 6 (EPA)

This decision document presents the Explanation of Significant Differences (ESD) for the Old Inger Oil Refinery Superfund Site (site), located in a rural setting, between Highway 75 and the Mississippi River, 4.5 miles north of Darrow, Ascension Parish, Louisiana. This ESD is issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Section 300.435(c)(2)(i). The Director of the Superfund Division has been delegated the authority to sign this ESD.

II. STATEMENT OF PURPOSE

The EPA is issuing this ESD for the site to document the final decisions on one of the remedial action items deferred in the September 25, 1984 Record of Decision (ROD) on this site that involved the level of cleanup for the shallow ground water. This ESD also clarifies that the existence of an ungrouted on-site well could not be verified on-site.

Description of Significant Differences

Studies conducted by the Louisiana Department of Environmental Quality (LDEQ) indicate that no further action is necessary with regard to the shallow groundwater. Also, during the implementation of remedial activities and excavations conducted over the entire site, the location of the on-site well could not be confirmed.

III. SITE HISTORY AND CONTAMINATION

History The site began operations in 1967 as an oil refinery and was purchased by Old Inger Refinery in 1976 to be used as an oil reclamation plant for refinery wastes. It remained active in this function until March 1978 when a large spill occurred, contaminating the surrounding area. The facility was purchased shortly thereafter with the intention of cleaning up the site. However, the new owners found facility restoration to be uneconomical and abandoned the site in 1980. The Louisiana Environmental Control Commission formally declared the site abandoned in 1981. The site was added to the National Priorities List (NPL) on September 6, 1983. In 1989, a contract was awarded for the first phase of Remedial Action.

Removal Activities

From April 1983 through August 1988, five emergency removal actions were conducted to stabilize the site including: site security, migration control, excavation and containment of consolidated soils, sampling and analysis. These immediate actions reduced the potential for contact with site contamination and the further spread of contaminated materials to make the site safer while long-term cleanup activities proceeded.

Site Contamination

When the site was operated, waste oils were brought to the approximately 10 acre site by barge and truck. Waste oils were processed in a cracking tower and stored on site. Final products were generally removed by truck. The lagoons were used for disposal of waste sludges, oils, and surface water. Occasionally, liquid from one of the lagoons was siphoned into the swamp to help maintain storage capacity. The liquid was siphoned from the liquid fraction between the floating sludges and oils and the bottom sludges. Some oily materials were discharged into the swamp during the siphoning process. On at least one occasion, a feedstock line broke and discharged a substantial quantity of oil into the swamp.

The contaminants found on the site included hazardous substances which are not petroleum and are not subject to the exclusions under CERCLA Sections 101 (14) and 104 (a)(2): These substances were believed to result largely from the presence of oil additives and products of combustion. The waste at the site contained quantities of hazardous constituents which potentially have toxic, carcinogenic, mutagenic or teratogenic effects on humans or other life forms. These included: trace heavy metals, naphthalene, phenols, benzene, benzo (a) anthracene and benzo (a) pyrene.

IV. SELECTED REMEDY

Record of Decision A Record of Decision (ROD) was signed on September 25, 1984 for this site. The selected remedy consisted of the following major components:

1. Closing and sealing of an ungrouted on-site well.
The closing and sealing of an ungrouted on-site well was not accomplished due to the fact that the location and existence of the well was never verified. Several attempts were made to locate the alleged on-site well throughout the remediation of the site, which involved extensive excavation of affected soils. However, all monitoring wells installed throughout the remediation process were removed and grouted (plugged and abandoned) in accordance with State requirements.
2. Pumping and treatment of the shallow ground water aquifer via carbon adsorption.
The decisions on the need for corrective action for the intermediate aquifer and the level of cleanup for the shallow aquifer were deferred in the ROD.
3. Carbon adsorption treatment and discharge of contaminated fluids.
The treatment and discharge of contaminated fluids was implemented through the construction and operation of a wastewater treatment plant on-site.

4. In situ containment and capping of slightly contaminated soils.
The in situ containment and capping of soils were implemented.
5. On-site land treatment of heavily contaminated soils and sludges.
The on-site land treatment of soils was implemented through the construction and operation of a Land Treatment Unit (LTU). The LTU provided treatment through the biological degradation of wastes in the contaminated soils. These were spread over the treatment area and biodegradation rates were optimized by the addition of amendments, nutrients, moisture control, and tilling.
6. Disposal of contaminated wood.
The final method for disposal of contaminated wood was also deferred in the ROD. During the implementation of the remedial activities, soils were excavated and screened using a Trommel Power Screen. Pieces of wood, debris, garbage and metal left by the original owners (including buried gas cylinders) were separated and decontaminated. Decontaminated material was buried on-site under State oversight and approval. Decontaminated metal debris was shipped off site to a metal recycler and the uncovered cylinders were shipped off site for disposal at a facility approved by the State, meeting all State and RCRA requirements.
7. Land Use Restrictions.
The ROD contemplates implementing land use restrictions for waste left in place. Restrictions include a lien on the property of \$15,437,639.00 for the amount of remedial costs; and a notice in the mortgage and conveyance records that residual contaminant concentrations remain at the site but are below established remedial standards.

A clay protective cap complete with topsoil and grass, necessary for protectiveness of the remedy or for its successful operation and maintenance, remains on the site. Disturbing or moving this protective feature of the remedy may pose a threat to human health or the environment, and may subject the property owner and the party causing the disturbance to liability under CERCLA or other laws.

Due to the location of the site, a rural area adjacent to the levee of the Mississippi River, restrictions by the U.S. Corps of Engineers, the Louisiana Department of Transportation and Development and the Pontchartrain Levee Control Board have established restrictions and prohibitions against excavation and coring on properties adjacent to the toe of the levee.

8. ESD date September 22, 1993
An ESD for this site was signed on September 22, 1993. The significant change that was documented in this ESD resulted from an increase in quantities of contaminated materials that were discovered during the remedial action. Specifically, the significant change documented in this ESD included:

- a. The volume of contaminated soils and sludges requiring treatment increased from an estimated 40,000 cubic yards to approximately 100,000 cubic yards.
- b. The volume of contaminated water requiring treatment increased from an estimated 10 million gallons to approximately 28 million gallons.

In accordance with this ESD, the additional volumes of soils and sludges were treated throughout the remedial action activities and the operation of the LTU unit. The wastewater treatment plant was kept in operation throughout the remedial action activities to treat the contaminated water.

V. BASIS FOR THE DOCUMENT

The 1984 ROD projected a cost of \$481,000 for the treatment of contaminated liquids and \$565,000 for the on-site land treatment.

Remedial Action was implemented at this site under separate phases. An initial phase, Phase IV-A removed contaminated liquids and sludges from a site impoundment, built the wastewater treatment unit, and the LTU in 1992. This first phase was implemented at a total cost of over \$7,796,980.

During the second phase, May 1998 through March 2002, contaminated soils were excavated, treated in the LTU and returned back to the excavation or used in the final grading and capping of the site. This last phase was implemented at a total cost of over \$6.3 million dollars. A "Final Report for Old Inger Superfund Site," Phase IV-C, was prepared by IT Corporation on February 15, 2001 for the LDEQ. The report is considered the basis for an upcoming Final Close Out Report or RA Completion Report.

Phase IV-C treated approximately 15,712,300 gallons of water; excavated, screened and treated approximately 63,398 tons of material; and applied approximately 40,000 cubic yards of clay and 24,800 cubic yards of topsoil to build the cap. Phases IV-B and IV-C were implemented at a total cost of over \$7,107,677.

The final phase of remedial work involves the evaluation of the shallow groundwater after implementation of the above remedial activities. For this phase a surface- and borehole-geophysical investigation was conducted in coordination with the U.S. Geological Survey (USGS), and their findings are presented in the letter report dated October 25, 2001, (Superfund Document Management System (SDMS) record number 904038). Also, a network of monitoring wells was installed and a quarterly sampling and evaluation program was instituted to run for a period of two years. These monitoring activities involve a total cost of approximately \$134,377.

Information based in eight quarterly reports is the basis for this ESD. These reports indicate that the shallow ground water, upon review against the State Risk Evaluation Corrective Action Program (RECAP) requirements, does not represent any unacceptable risk to human health or the environment. These requirements require the same level of protection as EPA requirements

(1 x10⁻⁶ or one in a million risk). The reports are available under the following titles and SDMS record numbers:

First Quarter 2004 Groundwater Monitoring Report	SDMS 168917
Second Quarter 2004 Groundwater Monitoring Report	SDMS 172660
Third Quarter 2004 Groundwater Monitoring Report	SDMS 183476
Fourth Quarter 2004, Groundwater Monitoring Report	SDMS 184002
First Quarter 2005, Groundwater Monitoring Report	SDMS 189055
Second Quarter 2005, Groundwater Monitoring Report	SDMS 192605
Third Quarter 2005, Groundwater Monitoring Report	SDMS 196415
Fourth Quarter 2005, Groundwater Monitoring Report	SDMS 197094

The EPA and the LDEQ anticipate proceeding with final close out, construction completion and site deletion activities.

VI. DESCRIPTION OF SIGNIFICANT DIFFERENCES

This ESD documents that through the implementation of remedial activities and excavations conducted over the entire site, the location of an on-site well could not be confirmed.

This ESD documents a final decision on the requirement of pumping the shallow ground water, an item in the original ROD deferred for a later day resolution. At this time, studies conducted indicated that no further action is necessary in regard to pumping the shallow groundwater or implementing other actions in relation to the intermediate aquifer.

VII. LEAD AND SUPPORT AGENCY COMMENTS

The EPA and the State of Louisiana, through the LDEQ, agree there is no need to further treat the shallow groundwater at this time, since studies are showing that currently the groundwater, after treatment of contaminated soils and sludges, does not represent an unacceptable risk. This determination is made based on groundwater studies and sampling events that show the groundwater meets the LDEQ Risk Evaluation/Corrective Action Program (RECAP) regulations or requirements. These regulations were promulgated and became final on October 20, 2003. They establish the minimum remediation standards for present and past uncontrolled constituent releases.

The Remedial Action is being conducted as a State-lead project under a Cooperative Agreement with EPA which provides 90% funding and therefore does not require a Superfund State Contract for the 10% match.

The support agency, EPA, has been consulted and provided the opportunity to comment on this ESD in accordance with NCP § 300.435 (c)(2) and 300.435 (c)(2)(i) and CERCLA § 121 (f).

VIII. STATUTORY DETERMINATIONS

The EPA has determined that these significant changes comply with the statutory requirements of CERCLA § 121, 42 U.S.C. § 9621, are protective of human health and the environment, comply with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, are cost-effective, and utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

This remedy will not result in hazardous substances, pollutants, or contaminants remaining on-site above levels that require remedial action. But because the site location does not allow for unlimited use and unrestricted exposure, a statutory review will be conducted no less often than every five years after the initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

IX. PUBLIC PARTICIPATION

This ESD will become part of the Administrative Record (NCP 300.825(a)(2)), which has been developed in accordance with Section 113 (k) of CERCLA, 42 U.S.C. § 9613 (k), and which is available for review at the:

Louisiana Department of Environmental Quality
Public Records Center
Galvez Building Rm 127
602 N. Fifth Street
Baton Rouge, Louisiana, 70802
Monday - Friday, 8:00 a.m. to 4:30 p.m.

and

United States Environmental Protection Agency
Region 6
12th Floor Library
1445 Ross Avenue
Dallas, Texas, 75202
Monday - Friday, 7:30 a.m. to 4:30 p.m.

As required by NCP § 300.435(c)(2)(i)(B), a Notice of Availability and a brief description of the ESD has been published in the local paper.

X. PROTECTIVENESS STATEMENT

I have determined the remedy for the Old Inger Oil Refinery site as modified by this ESD is protective of human health and the environment, and will remain so provided the actions presented

in this report are implemented as described above.

XI. AUTHORIZING SIGNATURE

This ESD documents the significant changes related to the remedy at the Old Inger Oil Refinery Superfund Site. These changes were selected by EPA with the concurrence of the Louisiana Department of Environmental Quality (see separate concurrence document).

U.S. Environmental Protection Agency

By: Samuel Coleman, P/E.
Samuel Coleman, P/E.
Director
Superfund Division

Date: 9/12/06

Louisiana Department of Environmental Quality

By: Wilbert F. Jordan, Jr.
Wilbert F. Jordan, Jr., M.S., J.D.
Assistant Secretary
Office of Environmental Assessment

Date: 8-29-06

Final Close Out Report

**Old Inger Oil Refinery Superfund Site
Ascension Parish, Louisiana**

**United States Environmental Protection Agency
Region 6**

Superfund Division

September 2006

Concurrence page


**CONCURRENCE PAGE FOR THE OLD INGER
SUPERFUND SITE
FINAL CLOSE OUT REPORT**

Document prepared By:
EPA Region 6
Remedial Project Manager:


Bartolome J. Cañellas (6SF-LP)

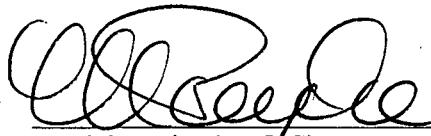
8/18/06
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Concur By:
EPA Region 6
Site Attorney:


Gloria Moran (6RC-S)

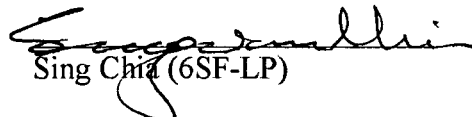
9/5/06
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Concur By:
EPA Region 6
Superfund Branch Chief, Office of
Regional Counsel:


Mark Peycke (6RC-S)

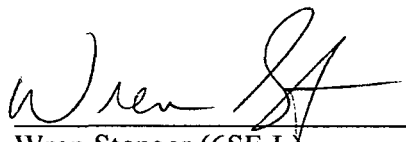
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Concur By:
EPA Region 6
LA/OK Section Chief


Sing Chia (6SF-LP)

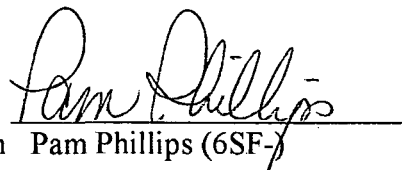
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Concur By
EPA Region 6
LA/OK/NM Branch Chief:


Wren Stenger (6SF-L)

9/11/06
Date

Concur By
EPA Region 6
Deputy Director, Superfund Division


Pam Phillips (6SF-)

9/12/06
Date

**FINAL CLOSE OUT REPORT
OLD INGER OIL REFINERY SUPERFUND SITE
ASCENSION PARISH, LOUISIANA**

I. INTRODUCTION

This Close Out Report (COR) documents that the U.S. Environmental Protection Agency (EPA) and the State, the Louisiana Department of Environmental Quality (LDEQ or State) have completed response actions for all the Operable Units, (OUs) of the Old Inger Oil Refinery (OIOR or Site) Superfund site in Ascension Parish, Louisiana, in accordance with "Close Out Procedures for National Priorities List Sites," EPA 540-R-98-016, OSWER Directive 9320.2-09 A-P (January 2000).

The EPA and the State of Louisiana conducted a final construction inspection on October 26, 2001. The EPA and the State have determined that the site contractor performed the remedy in accordance with remedial design (RD) plans and specifications and the Record of Decision (ROD) for the Site dated September 25, 1984. All field construction-site activities required for the remedial actions have been completed.

These activities were completed in October 2001 as documented in the Final Report for the Old Inger Oil Refinery Superfund Site approved by the EPA on June 4, 2002.

Remedial Actions related to the ground water have been investigated. Shallow ground water was initially to be pumped and treated, however a final determination was deferred in the ROD. After construction of all field activities in 2002, monitoring wells were installed around the entire Site. Eight rounds of quarterly ground water monitoring were conducted and no contaminants were observed above levels that would present an unacceptable risk. Based on this, an Explanation of Significant Differences (ESD) was issued in May 2006 to delete this requirement from the ROD. At the same time, clarification was provided to explain that the location of an on-site well was not uncovered throughout all the remedial activities that were implemented.

II. SUMMARY OF SITE CONDITIONS

Background

The Site is located approximately 4.5 miles north of Darrow, Louisiana on the east bank of the Mississippi River on Highway 75. The Site was named to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) National Priorities List in 1983 (EPA ID# LAD980745533). Closure of the Site was conducted under a Cooperative Agreement between the U.S. Environmental Protection Agency (EPA) and the LDEQ.

The Site extends over approximately 10 acres and is bounded to the north by the Louisiana Highway 75, the levees of the Mississippi River to the south and to the east and west by vacant lots. The Site

is in a very rural area; the nearest residence is 0.3 miles south of the Site. Agricultural farm properties are located north of LA Highway 75 in the vicinity of the Site.

History

The Site is a former waste oil reclamation facility that began operation in 1967. During operations, waste oils were brought in by truck and barge. Lagoons were used for disposal of waste sludges and oils. Periodically, the materials in the lagoons were pumped into the adjacent swamps to maintain storage capacity. Approximately ten Site storage tanks were used ranging in size from 37,500 to 225,500 gallons. According to statements, waste oil processing was based on acid treatment versus conventional refinery cracking. Some of the Site problems included a large spill during unloading of used oil from a barge, tanks overfilling, and drums and construction debris being buried in lagoons. After the major spill in 1978, the property changed ownership. The new owners had intended to clean up the Site, but abandoned it in 1980.

Investigations by both the EPA and LDEQ revealed the presence of contaminated waste oils, sludges, sediments, and water. From the investigations, it was determined that the types and concentrations of contaminants at the Site posed a potential hazard to human health and the environment. The Site was subsequently placed on the National Priorities List for remediation under CERCLA as the State's highest priority site.

From April 1983 through August 1988, five emergency removal actions were conducted to stabilize the Site including: Site security, migration control, excavation and containment of consolidated soils, sampling and analysis. These immediate actions reduced the potential for contact with Site contamination and the farther spread of contaminated materials to make the Site safer while long-term cleanup activities proceeded.

Remedy Selection

The EPA, with concurrence from the State of Louisiana, signed the ROD on September 25, 1984. The major components of the selected remedy included:

- Closing and sealing of an ungrouted on-site well
The closing and sealing of an ungrouted on-site well was not accomplished. As explained in the ESD, throughout the remediation process the alleged location of the well and the majority of the Site were excavated and the existence of this on-site well was not verified.
- Pumping and treatment of the shallow ground water aquifer via carbon adsorption.
As explained in the ESD, the decisions on the need for corrective action for the intermediate aquifer and the level of cleanup for the shallow aquifer were deferred in the ROD and after eight rounds of quarterly monitoring a decision was reached that this action is not required.

- Carbon adsorption treatment and discharge of contaminated fluids.
The treatment and discharge of contaminated fluids were implemented through the construction and operation of a wastewater treatment plant on-site.
- In situ containment and capping of slightly contaminated soils.
The in situ containment and capping of soils were implemented.
- On-site land treatment of heavily contaminated soils and sludges.
The on-site land treatment of soils was implemented through the construction and operation of a Land Treatment Unit (LTU). The LTU provided treatment through the biological degradation of wastes in the contaminated soils. These were spread over the treatment area and biodegradation rates were optimized by the addition of amendments, nutrients, moisture control, and tilling.
- Disposal of contaminated wood.
The final method for disposal of contaminated wood was also deferred in the ROD. During the implementation of the remedial activities, soils were excavated and screened using a Trommel Power Screen. Pieces of wood, debris, garbage and metal left by the original owners (including buried gas cylinders) were separated and decontaminated. Decontaminated material was buried on-site under State oversight and approval. Decontaminated metal debris was shipped off-site to a metal recycler and the uncovered cylinders were shipped off-site for disposal at a facility approved by the State, meeting all State and RCRA requirements.
- Land Use Restrictions.
The ROD contemplates implementing land use restrictions for waste left in place. Restrictions include a lien on the property of \$15,437,639.00 for the amount of remedial costs; and a notice in the mortgage and conveyance records that residual contaminant concentrations remain at the site but are below established remedial standards.

A clay protective cap complete with topsoil and grass, necessary for protectiveness of the remedy or for its successful operation and maintenance, remains on the site. Disturbing or moving this protective feature of the remedy may pose a threat to human health or the environment, and may subject the property owner and the party causing the disturbance to liability under CERCLA or other laws.

Due to the location of the site, a rural area adjacent to the levee of the Mississippi River, restrictions by the U.S. Corps of Engineers, the Louisiana Department of Transportation and Development and the Pontchartrain Levee Control Board have established restrictions and prohibitions against excavation and coring on properties adjacent to the toe of the levee.

Remedial Construction Activities

The remedial design was completed and remedial activities were implemented in phases.

The initial phase started in 1990 and was completed in 1992. During this phase, contaminated liquids and sludges were removed from the surface impoundment, and the wastewater treatment plant and the LTU were constructed. On September 22, 1993, an ESD was signed to document the increase in quantities of contaminated soils, sludges and liquids that were discovered during this initial phase of the remedial action.

A second phase was started in 1998 and completed in 2002. During this phase, the increased volumes of contaminated soils were excavated, treated in the LTU and returned back to the excavation or used in the final grading and capping of the site. Approximately 15,712,300 gallons of water were treated in the treatment plant; soils totaling approximately 63,398 tons were excavated, screened and treated; the Site was graded and approximately 40,000 cubic yards of clay and 24,800 cubic yards of topsoil were applied to build the cap.

The final phase of remedial work involved the evaluation of the shallow groundwater. For this phase, a surface- and borehole-geophysical investigation was conducted in coordination with the U.S. Geological Survey (USGS), and their findings were reported in the letter dated October 25, 2001. Also, a network of monitoring wells was installed and a quarterly sampling and evaluation program was instituted to run for a period of two years.

In summary, the Site was remediated by removing the impoundments, tanks, associated refinery equipment and debris. Contaminated soils were treated by on-site bioremediation of the affected media in a LTU, capped with a two-foot thick clay cap and revegetated with a topsoil layer and native grasses. Finally, the shallow ground water was investigated and no unacceptable risks were identified.

III. DEMONSTRATION OF QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) FROM CLEANUP ACTIVITIES

The quality assurance/quality control (QA/QC) program for this remedial action was conducted in accordance with the OIOR Site Quality Assurance Project Plan (QAPP) prepared by the LDEQ for this Site. The LDEQ was the lead for remediation at this Site and EPA was the support agency. Contracts were awarded by the LDEQ for the different phases and the LDEQ provided oversight for the construction activities.

The performance of the activities described in the OIOR RD plan and the Site Sampling and Analysis Plan (SAP) resulted in the demonstration of achievement of the cleanup levels. These plans provided a system to identify general areas of contamination and a procedure to confirm that treated material met the performance standards. The quality control objectives of the waste treatment activities and post-treatment sampling were to demonstrate and document that contaminated waste materials were stabilized, and blended to meet the waste treatment standards.

The quality assurance objective for transportation and disposal was to verify and document that material removed from the site was transported and disposed in EPA and LDEQ approved facilities.

On-site scales were used to weigh all materials being excavated and scales were calibrated prior to the initial operations. Copies of the weight tickets, and laboratory analysis certifications were submitted to LDEQ throughout the implementation of the remedial activities.

Procedures and activities established in the Air Monitoring Plan (AMP) were used to obtain data of sufficient quantity and quality to demonstrate compliance with the air quality standards at the site work area and site boundaries. The AMP established the procedures for monitoring and sampling ambient air for hazardous chemicals potentially emitted during remedial activities. Air monitoring was conducted during all phases of the remedial action construction activities.

In summary, the construction QA/QC plans for this Site were implemented throughout the remedial activities. Construction completion is consistent with the ROD, ESDs, and the remedial design plans and specifications.

IV. MONITORING RESULTS AND SITE COMPLETION

All Site construction activities have been completed.

The EPA defines Institutional Controls (ICs) as "non-engineered instruments, such as administrative and legal controls, that help to minimize the potential for human exposure to contamination and protect the integrity of the remedy." ICs work by limiting land or resource use and by providing information that helps modify or guide human behavior at properties where hazardous substances prevent unlimited use and unrestricted exposure. (EPA Office of Solid Waste and Emergency Response (OSWER) Directive No. 9355.0-106, September 2004)

Residual waste left in place does not allow for "unlimited use and unrestricted exposure (uu/ue)." Residual contaminant concentrations remain at the Site but are below established remedial standards. As indicated above, ground water monitoring was conducted quarterly for two years to confirm that shallow ground water does not represent an unacceptable risk.

Due to the location of the Site, a rural area adjacent to the Mississippi River levee, additional restrictions against excavation and coring are applicable to the Site. Both the U.S. Army Corps of Engineers and the Pontchartrain Levee Control Board have restrictions and prohibitions against coring and excavation on properties adjacent to the toe of the levee.

The Institutional Controls (ICs) at the Site include a lien on the property for the amount of the remedial costs, which shows that the property has contaminants, and has been subject to a remedial action; and a notice in the mortgage and conveyance records stating that residual contaminant concentrations remain at the Site but are below established remedial standards.

V. SUMMARY OF OPERATION AND MAINTENANCE (O&M)

The EPA, the LDEQ and the U.S. Geological Survey conducted additional studies to evaluate the Site, and to demonstrate that the shallow ground water does not represent an unacceptable risk. The ten monitor wells used for this study have been plugged and abandoned according to State of Louisiana regulations and guidelines.

Long term O&M activities will be to maintain the cap and to ensure the fencing remains intact and secure.

VI. SUMMARY OF REMEDIATION COST

As of (date) March 2006 Superfund has spent over \$20,000,000 in the investigation and remediation of the OIOR site. Through a Superfund Cooperative Agreement (SCA) the State of Louisiana has received approximately \$15,000,000. The State also contributed 10% of the cost for all remedial action activities at the site.

Future O&M activities to be conducted by the State include periodic mowing and tracking the maintenance of the Site cap currently estimated at \$25,000, and the continuation of Five-Year reviews to be conducted by the EPA estimated at \$50,000 every five years.

VII. PROTECTIVENESS

Because the remedial actions at all OUs are protective, the Site is protective of human health and the environment. The protectiveness of this Site will be verified through the Five-Year Review process.

VIII. FIVE-YEAR REVIEW

Hazardous substances will not remain on-site above health-based levels for the anticipated future land uses as rural vacant land.

The threshold for Five-Years Reviews is uu/ue. Future Five-Year Reviews, as indicated in this document, will continue to monitor the maintenance of the ICs and the limited use of the Site at the toe of the Mississippi River levee, to ensure protection of human health and the environment.

Pursuant to CERCLA Section 121(c) and as provided in OSWER Directive 9355.7-03 B-P, Comprehensive Five-Year Review Guidance, dated June 2001, the EPA will continue to conduct Five-Year reviews for the Site.

U.S. Environmental Protection Agency

By: Samuel Coleman, P/E.
Samuel Coleman, P/E.
Director
Superfund Division

Date: 9/12/06

Louisiana Department of Environmental Quality

(See concurrence on separate document)

By: Wilbert F. Jordan, Jr.
Wilbert F. Jordan, Jr., M.S., J.D.
Assistant Secretary
Office of Environmental Assessment

Date: 8-29-06

8-23-06
GSF-L

1cc

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CONVEYANCE NOTIFICATION

The Louisiana Department of Environmental Quality (LDEQ) hereby notifies the public that the Old Inger Oil Refinery Superfund Site ("the Site"), Agency Interest Number 4714, located along Louisiana Highway 75, was closed with contaminant levels present that are in accordance with the Record of Decision (ROD), the Explanation of Significant Difference (ESD) to the ROD, and Remedial Action soil contaminant goals as established in the Remedial Action Plan for the Old Inger Refinery Site.

The Site was closed in accordance with the Louisiana Revised Statutes, Subtitle II of Title 30, Chapter 12. Information regarding this site is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of this site may be directed to LDEQ, Remediation Services Division, P.O. Box 4314, Baton Rouge, LA 70821-4314, or (225) 219-3236.

LDEQ hereby notifies interested persons of the following regarding the Site:

- The Site has been the subject of an action by the U.S. Environmental Protection Agency (U.S. EPA) and LDEQ response under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA);
- Hazardous substances (oil and grease) remain in soils at a specified location on the property above levels that allow for unrestricted exposure (less than 5 percent by weight);
- Disturbing or moving soil in these locations may pose a threat to human health or the environment, and may subject the property owner and the party causing the disturbance to liability under CERCLA or other laws;
- A clay protective cap complete with topsoil and grass, necessary for protectiveness of the remedy or for its successful operation and maintenance, remains on the property at a specified location;
- Disturbing or moving this protective feature of the remedy may pose a threat to human health or the environment, and may subject the property owner and the party causing the disturbance to liability under CERCLA or other laws.

Contaminants remaining at the property:

Media	Contaminant	Concentration
Soil	Oil and Grease	< 5% by Weight



The Legal Description of the Site is as follows:

A certain tract of land situated in the Parish of Ascension, Louisiana, and being the southern portion of Tract No. 12 and the northern portion of Tract 13 of Belle Helene Subdivision being Strip "C" in the Act of Partition among the heirs of John T. Many dated June 9, 1930, and recorded in C.O.B. 70, Folio 432 of Ascension Parish, Louisiana, which said Strip "C" is more particularly described as bounded on the North by Strip "B", on the lower or South side by Strip "D" and measuring 6.05 chains at its West end or front by a depth of 68.22 chains on its North or upper line and 64.55 chains on its South or lower line and contains 31.66 acres or 37.47 arpents; together with all building and improvements thereon and thereunto belonging.

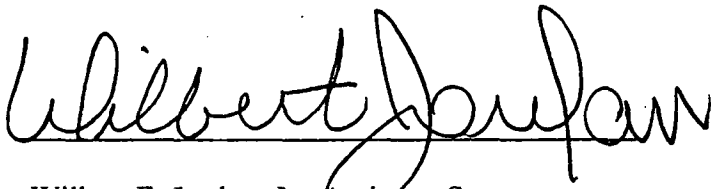
A certain piece or parcel of real estate situated in the Parish of Ascension, State of Louisiana, East of the Mississippi River at about five and one-half miles above the Village of Darrow, and being a certain fractional portion of Tract 12 of the Belle Helene Subdivision and being more specifically described as Lot No. "A" of said Tract No. 12, all as fully described in an Act of Partition between Henry J. Many and others before J.F. Fernandez, Notary Public, dated June 9, 1930, and recorded in C.O.B. 70, Folio 432; said parcel of ground being on the upper or North side of Tract 12 of the Belle Helene Subdivision and measures 5.472 chains at its extreme West end or front by a depth of 74.95 chains and 4.31 chains on the rear line or east end of said tract containing 31.66 acres or 37.47 arpents.

A certain tract of land situated in the Parish of ascension, Louisiana, and being the southern portion of Tract No. 12 and northern portion of Tract 13 of Belle Helene Subdivision being Strip "B" in the Act of Partition among the heirs of John T Many dated June 9, 1930, and recorded in C.O.B. 70, Folio 432 of Ascension Parish, Louisiana, which said Strip "B" is more particularly described as bounded on the North by Strip "A", on the lower or South side by Strip "C" and measuring 5.736 chains at its West end or front by a depth of 71.66 chains on its North or upper line and 68.22 chains on its South or lower line and contains 31.66 acres or 37.47 arpents; together with all buildings and improvements thereon and thereunto belonging.

A certain strip of land together withal rights, ways, and privileges thereon and thereto belonging, situated in the Parish of Ascension, State of Louisiana, having a front on the public gravel road of 114 feet, by a depth of 3,228 feet, and a width of 78 feet in the rear, said strip containing 7.57 acres and is situated in the upper or North side of Tract "D" as described in the Act of Partition among the heirs of John T. Many, dated June 9, 1930, and recorded in C.O.B. 70, Folio 432 of Ascension Parish, Louisiana, together with all buildings and improvements thereon and thereto belonging.

The above described tracts being the properties acquired by Mr. Leola Melancon Many from George J. Melancon by act of sale dated January 14, 1950 and recorded in C.O.B. 91, Folio 74 of the Conveyance Records of the Parish of Ascension, Louisiana. For further acquisition see C.O.B. 90, Folio 349, and C.O.B. 70, Folio 432 of the Conveyance Records of Ascension Parish, Louisiana.

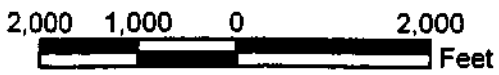
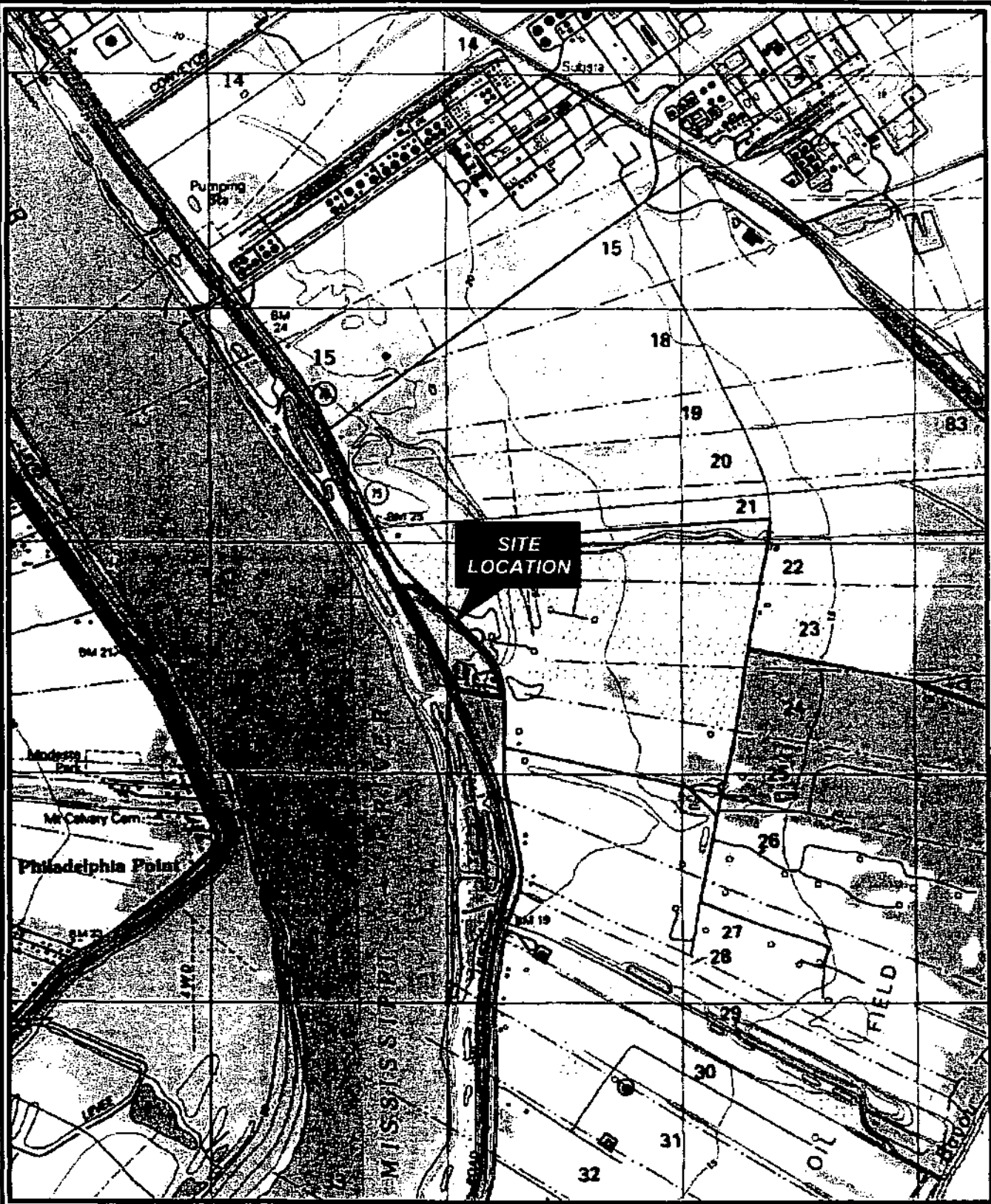
Maps of the property are attached.



Wilbert F. Jordan, Jr., Assistant Secretary
Office of Environmental Assessment, LDEQ

Aug 17, 2008
Date

OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
BTR	P.GUIDRY 3/8/04	GL 3/8/04	GL 3/8/04	101105_AV-01

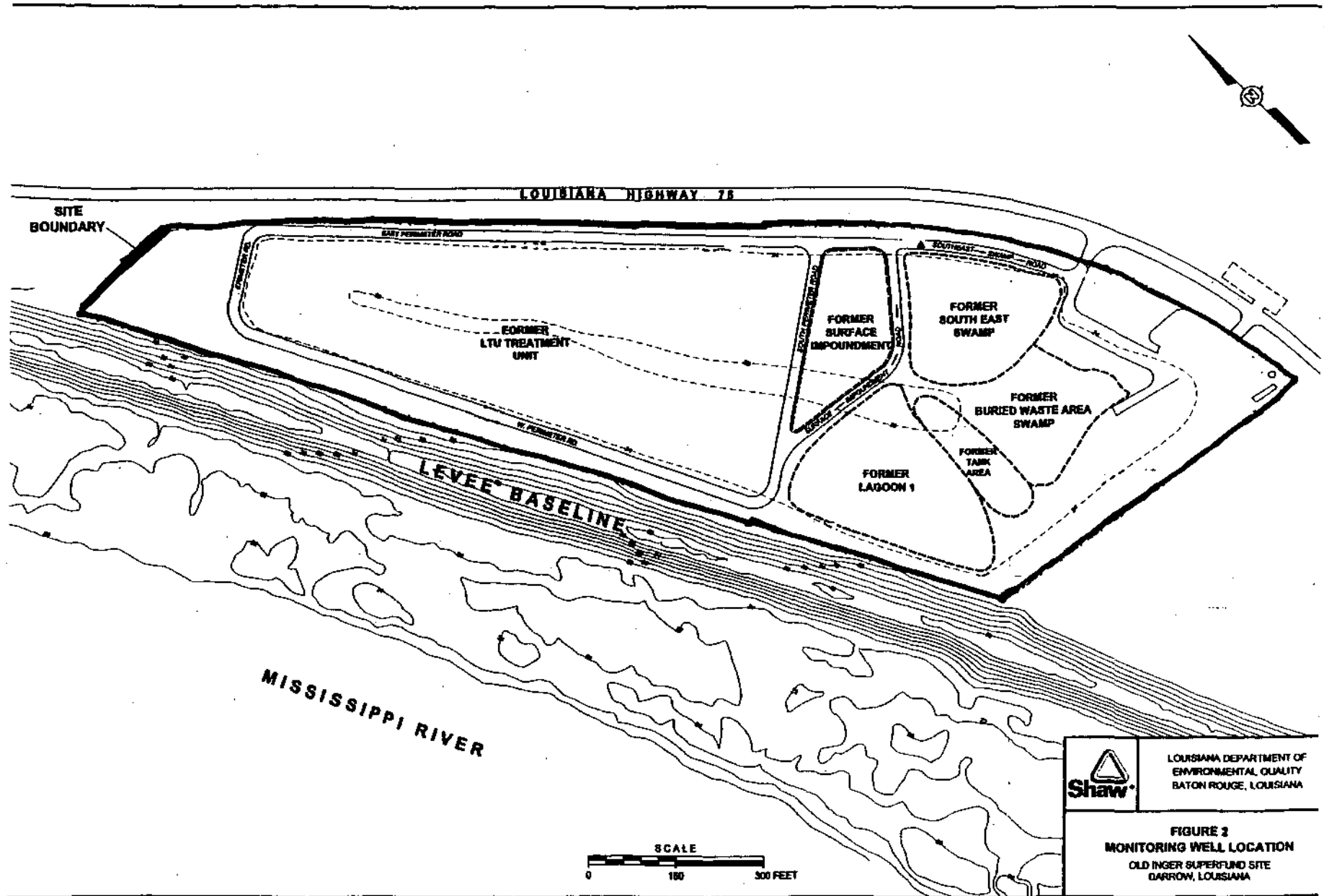


REFERENCE:
USGS 7.5 Minute Quadrangel Topographic Map
Crescent & Coates, LA (4000)



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
BATON ROUGE, LOUISIANA

FIGURE 1
SITE LOCATION MAP
OLD INGER SUPERFUND SITE
DARROW, LOUISIANA





 LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 BATON ROUGE, LOUISIANA

FIGURE 2
MONITORING WELL LOCATION
 OLD INGER SUPERFUND SITE
 DARROW, LOUISIANA



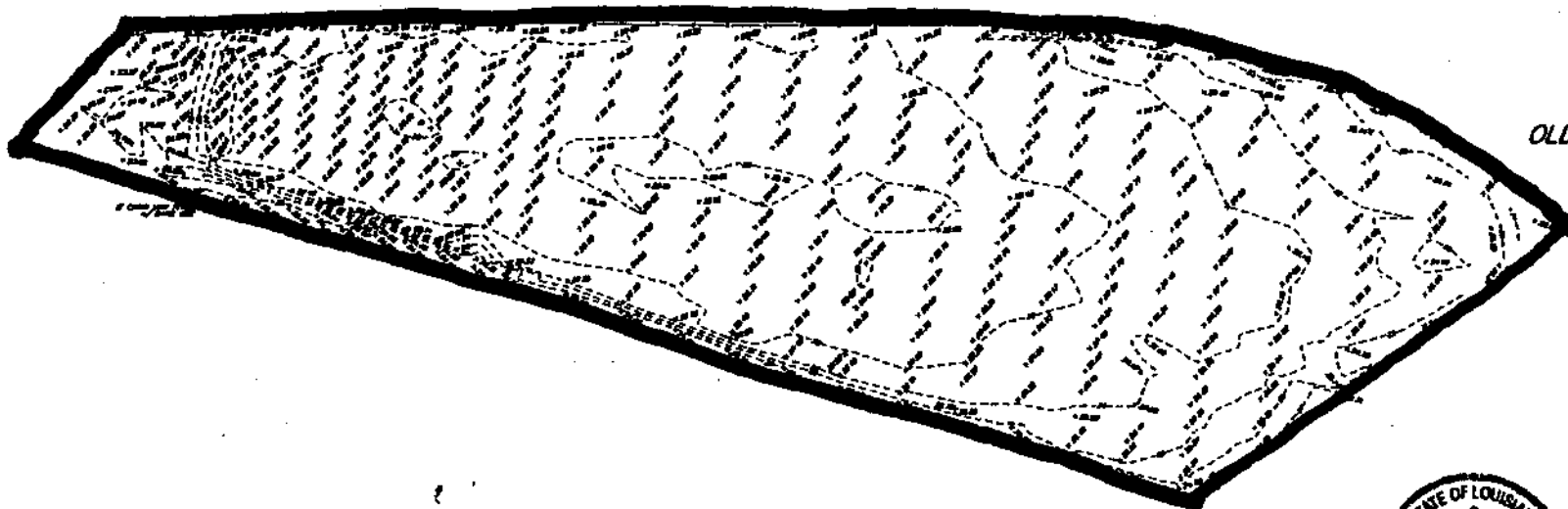
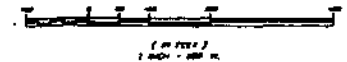
AERIAL MAP
Scale: 1" = 100'

**TOPOGRAPHIC SURVEY
OF
OLD INGER SUPERFUND SITE
FOR
EARTHTECH, INC.**

LEGEND

- BOUNDARY OF SUPERFUND SITE
- CONTOUR
- - - - - 10 FT
- - - - - 20 FT

GRAPHIC SCALE



AREA OF INVESTIGATION
Oil and Grease in soil less than 5% by weight

NOTE:
CONTOURS SHOWN HEREON
REPRESENT THE EXISTING GROUND
SURFACE AS OF JANUARY 03, 2002

GENERAL NOTES:

1. THE SURVEY PROPERTY IS SHOWN HEREON AS A PART OF THE OLD INGER SUPERFUND SITE. THE SURVEY PROPERTY IS SHOWN HEREON AS A PART OF THE OLD INGER SUPERFUND SITE. THE SURVEY PROPERTY IS SHOWN HEREON AS A PART OF THE OLD INGER SUPERFUND SITE.
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DATE OF SURVEY: 02/06/02
BY: [Signature]

NO.	DATE	REVISION	BY
1	02/06/02	FINAL SURVEY AND DESIGN REPORT	DG

OLD SURVEY COMPLETE: 02/06/02 FIGURE 1-3

SIB GROUP
INCORPORATED

10000 N. MOORE AVE. • SUITE 100 • DALLAS, TX 75243

CAD ORIGINAL	NO	NO	1 OF 1	02/06/02
NO. OF SHEETS	NO	NO	NO	NO
TOTAL SHEETS	NO	NO	NO	NO
NO. OF SHEETS	NO	NO	NO	NO