

**Addendum
Of the June 16, 2015
Preliminary Report**

By: Anthony Ryan
Public Analyst

MEMORANDUM

**MINISTRY OF THE ENVIRONMENT
DEPARTMENT OF ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL MONITORING AND RISK ASSESSMENT
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To: Ms. Melony Mckenzie
Director
DEHS

Your Reference:

Our Reference: EMRA/16/1

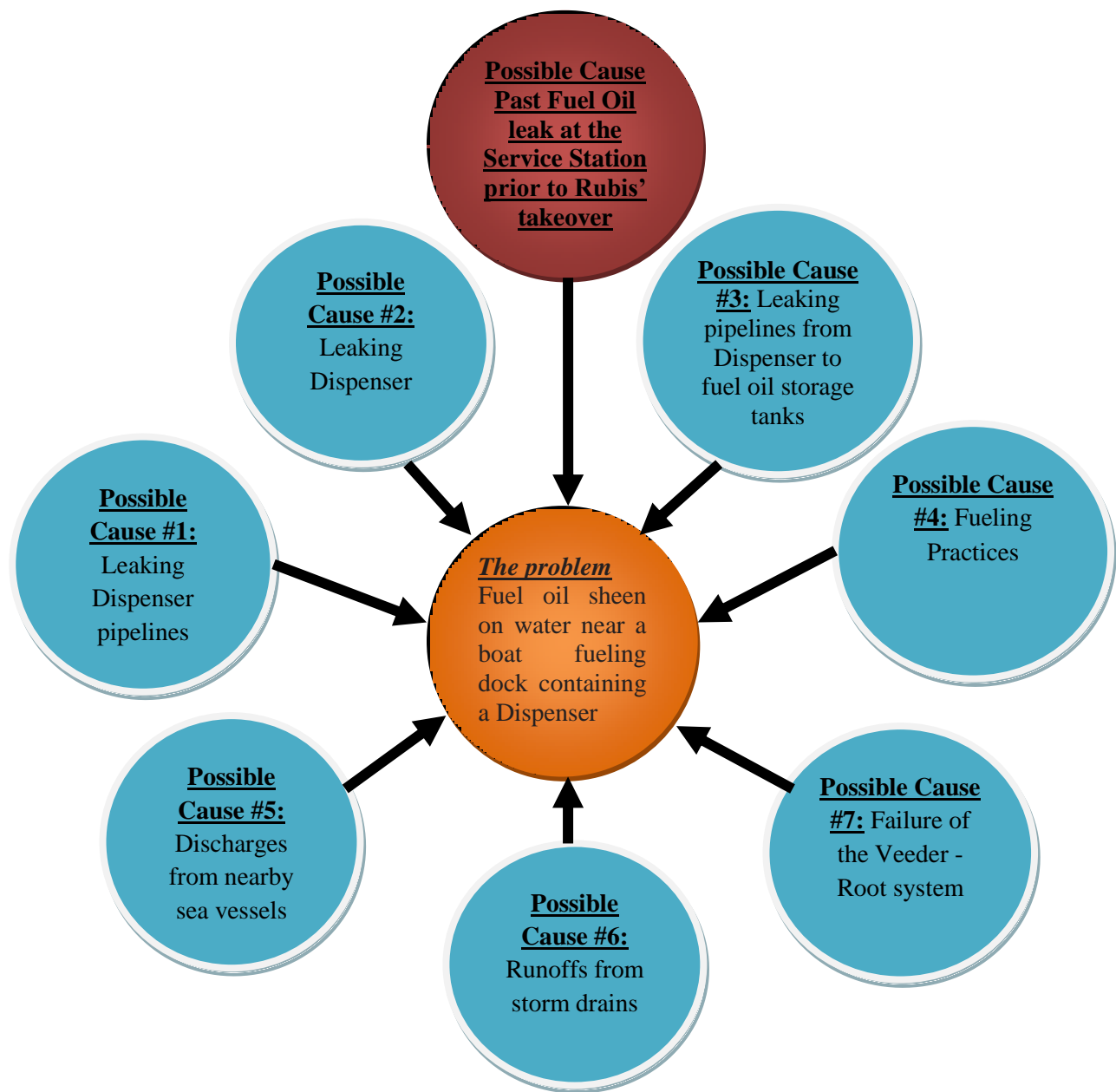
Date: June 24, 2015

Re: Addendum to the June 16th, 2015 Preliminary Report

Please be advised that following represents required additions to the June 16th, 2015 Preliminary Report:

1. Possible Causes:

Another Possible cause of the sheen on the water's surface is a past fuel oil spill at the Service Station prior to Rubis' takeover (see diagram below). Note that the existence of a past fuel oil spill was supported by Mr. Freeman Hanna, From the Volatile substance Section Ministry of Works in a meeting called by Rubis on June 19, 2015 (see minutes of the meeting attached).



	Likely	Unlikely	Not determined
Possible Cause #1: Leaking Dispenser pipelines		✓	
Possible Cause #2: Leaking Dispenser		✓	
Possible Cause #3: Leaking pipelines from Dispenser to fuel oils storage tanks	✓		
Possible Cause #4: Fueling Practices	✓		
Possible Cause #5: Discharges from nearby sea craft	✓		
Possible Cause #6: Runoffs from storm drains			✓
Possible Cause #7: Failure of the Veeder -Root system	✓		

2. There exists an area beneath the dock near the Sandy Port Marina where there is obvious protrusion of the wall. This appears to be the area where the sheen is localized.
3. The pressure testing on the gasoline and diesel pipelines carried out on June 12, 2015 held and passed. As a result representatives from both the Volatile Substance Section at the Ministry of Works and the Environmental and Monitoring Risk Assessment agreed to the resumption of operations of the fuel oil dispenser on the dock. However, on June 15, 2015 it was reported to EMRAD by Mr. Freeman Hanna that the pipelines failed indicating possibly that the pipeline breach may have been a result of the pressure testing that is, the excessive pressures place on the pipelines during the pressure testing exercise.
4. Several days after the decommissioning of the fuel oil pipelines leading from the Dispenser on the dock and the absence of fuel oils from the said pipelines, fuel oil sheen remains on the water's surface. The sheen is observed by both Mr. Freeman Hanna and Mr. Anthony Ryan.
5. The Veeter Root system at the Service Station did not indicate a leak.
6. The reconciliation (wet stock) reports showed less than 0.5% loss of product.

Note that information is once again being sought from Sandy Port Development Company Limited (see email attached) with no success.

Recommendations

- Both the gasoline and diesel pipelines leading from the dispenser to the various inland tanks should be replaced by double walled pipelines with proper fittings.
- The Sandy Port Development Company Limited should accept some responsibility for the oily sheen and share in the cleanup exercise.
- All other possible contributory factors to the oily sheen must be fully investigated.
- There must be regular monitoring by DEHS and regular updates provided.

Mr. Anthony Ryan

/ar

cc Mr. Dwayne Curtis, Assistant Director

**Minutes of a meeting compiled by
Sandy Port Development Company Limited
During a meeting Called by Rubis**

A meeting with personnel from Rubis, the Department of Environmental Health, Ministry of Works, the Sandyport HOA and Sandy Port Development Company Limited on June 19th, 2015.

The meeting was called to order at 1:30pm.

*Present were: Garth Buckner – President Sandy Port Development Company Limited.
Neale Jones – Vice President Sandy Port Development Company Limited
John Kiriaze – Site Manager Sandy Port Development Company Limited
Gordon Craig – Rubis Bahamas Limited
Huel R. Dames – Rubis Marine and Maintenance Manager
Sandy Sands – Chairman of the Board – Sandyport Homeowners Association
Simon Cooper – General Manager Sandyport Homeowners Association
Freeman Hanna – Ministry of Works – 465-8486
Anthon Ryan – Department of Environmental Health – 557-0379*

The meeting was chaired by Mr. Garth Buckner of Sandy Port Development Company Limited to discuss the way forward to resolving the reported gas leak. He thanked each and every one for coming on such short notice.

Mr. Gordon Craig said that he received a letter on June 10th, 2015 from Mr. Garth Buckner ordering them to turn the pump off. He said that this was done immediately.

He talked about eight (8) different observations of hydrocarbons present in the area:

They are as follows:

- 1. Generators on site*
- 2. Vehicles parked*
- 3. People dumping debris*
- 4. Commercial car wash on the eastern side*
- 5. Degreaser/armour all etc.*
- 6. Foodstore2to go – washing their trucks in the back of the gas station*
- 7. Restaurant dumping food waste in the canal*
- 8. Potential fuel in the ground as well as residual in the ground*

He said that on Friday they brought in a company to pressure test the lines. The lines were tested at 45 PSI. He said the lines passed the test. The lines were again tested on Saturday and Sunday at 30 PSI. The lines showed that the pressure dropped one (1) PSI every three minutes.

Neale Jones questioned – Was there any change since the pump was shut off?

Mr. Hanna responded by saying yes. He also made mentioned that there was a line damaged by a backhoe in the past. The sheen is not visible during high tide only when the tide is low.

He also said that there was no mention if there was a spillage in the past and that's another avenue that has to be looked in to.

Sandy Sands suggested that in addition to testing the lines there should be some random testing of the ground to satisfy that there is no past contamination radiating out in the ground.

Mr. Craig suggested that the way going forward that all sources of hydrocarbon should be stopped.

They would like to check the history of the service station and ask for Sandypart to assist them with this.

Rubis confirmed that they are going to replace all the existing lines with new ones and that work will take six to eight weeks.

Going forward Garth Buckner has agreed to stop all car washing on the property.

Mr. Ryan of Environmental Health has reiterated that all car washing etc. cease. He will send us a copy of the law. He will also look into all the testing of the lines.

Mr. Craig said that at present the lines are completely empty.

The meeting came to a close at approximately 2:20pm.

**Email to Mr. Buckner, Sandy Port
Development Company**

Dear Mr. Buckner

Pursuant to the meeting held between (EMRAD, Ministry of Public Works, and representatives of The Sandy Port Development Company Limited, Home Owners Association and Rubis) on June 19, 2015, I would wish to reiterate on behalf of my Director that the Department of Environmental Health Services (DEHS) is resolved in bringing this matter of the oil sheen on the water surface to a conclusion. To this end Sir, we require your assistance. We hereby request the following:

- 1. Complete drawings of the storm drains; and*
- 2. All details surrounding a historical fuel oil spill at the site several years ago prior to Rubis' acquisition of the Station. Recall that Freeman Hanna from the Volatile Substance Section at the Ministry of Public works confirmed the existence of the past fuel oil spill. The detail you will provide should be inclusive of but not limited to the following:*
 - The date of the fuel oil spill*
 - The quantity of fuel spilled*
 - The reporting date of the spill to the government if reported*
 - What remediation was carried out*
 - Details of previous owner and/or operators of the service station at that time*

Please provide dates as to when information can be provided.

It should noted that on June 19, 2015, an oil sheen was seen on the water's surface notwithstanding that Rubis' pipelines leading to the dispenser on the dock are inactive and contains no fuel oils.

As part of the investigation we are examining discharging practices into the marina. Effective immediately please cease and desist from all hydrocarbon discharges as identified and confirmed in the June 19, 2015, meeting as best as you can into the marine environment (please see the Environmental Health Services Act, Chapter 232, Part III

PART III PROHIBITIONS

7. Any person who, otherwise than in accordance with this Act and the regulations, deposits in, adds to, emits or discharges into the environment any contaminant or pollutant or who permits the deposit, emission or discharge into the environment of any contaminant or pollutant from any source is guilty of an offense.

*Anthony Ryan
Public Analyst*

Email to Mr. Craig, Rubis

Dear Mr. Craig;

In our continuing efforts to ascertain the source(s) of the oil sheen on the water at Sandy Port, I hereby request a meeting with you today (June 24, 2015). We have already made representation to Sandy Port Development Company inquiring as to other sources(s) which may be contributing to the oil sheen. The purpose of the meeting is not to assess blame but to find the problem, make immediate corrections and improve conditions so as to mitigate against such occurrences in the future.

Please convey to my office what time is best for you?

*Anthony Ryan
Public Analyst*