

Site NameLanson Farms 15 Flowline

Facility ID475986

Spill/Release ID487675

Remediation #37945

Document Date	Document #	Document Type	Condition of Approval (COA)	Corrective Action (CA)	Status	Date Resolved	Resolved Doc #
8/22/2024	403897427	Form 19 I/S	The operator is using an ECMC Form 19 I/S form for a recent spill; this form is typically used for reporting historical releases. The CA's added cannot be accurate as the form was filed on 8/22/2024 and the failed section of flowline is scheduled to be cut out and repaired on 8/23/2024 (per ECMC Integrity inspection completed 8/22/2024). An accurate inspection/ analysis of the pipe failure (root cause), detailed description of flowline repairs completed and measures taken to prevent a recurrence are required in CA section of ECMC Form 19 report. Update the CA section of Form 19 with updated/ accurate information.	Acknowledged. The root cause and preventative measures are outlined in form 19 doc#404020777 and 404072898.	Closed	1/8/2025; 2/26/2025	404020777; 404072898
8/22/2024	403897427	Form 19 I/S	The spill point is located 72' from the mapped flowline alignment as submitted by Operator to ECMC. Pursuant to Rule 1101.b.(3)(C) The GIS data for these off-location flowlines must be the most accurate data possible without using invasive methods AND a minimum horizontal positional accuracy of +/- 25 feet. Operator shall provide an updated flowline alignment via Form 44 within 90 days of spill discovery.	KPK has submitted form 44 doc#404030487 of the updated flowline location. The form is pending review and approval.	Closed	1/3/2025	404030487
8/22/2024	403897427	Form 19 I/S	Area is adjacent to surface water. Operator shall ensure that stormwater does not transport impacts outside of the spill footprint.	KPK has installed a lined and bermed containment surrounding the stockpile. KPK has also installed booms surrounding the excavation. Photos are attached in form 19 closure document	Closed	1/8/2025; 2/26/2025	404020777; 404072898
8/22/2024	403897427	Form 19 I/S	Due to the presence of impacted soil in contact with groundwater Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.	Acknowledged.	Closed	NA	NA
8/22/2024	403897427	Form 19 I/S	In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.	Acknowledged.	Closed	NA	NA
8/22/2024	403897427	Form 19 I/S	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).	Confirmation soil samples in accordance with the Rule 915.e.(2) were proposed in the form 27 initial.	Closed	10/16/2024	403955340

8/22/2024	403897427	Form 19 I/S	Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated Spill ID within 90 days of the spill/release date of discovery requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental within 90 days of the date of discovery which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.	Acknowledged. Form 27 initial document number 403955340 was submitted on 10/16/2024 and was approved on 11/21/2024. Closure request for the spill, form 19 document number 404020777 was submitted on 1/8/2025 and denied on 1/15/2025. The form 19 document number 404072898 requests closure.	Closed	2/26/2025	404072898
1/8/2025	404020777	Form 19 Supplemental	The operator has indicated the flowline repair was completed using poly pipe materials; this information does not appear to be accurate. Per communication with KPK field personnel during ECMC inspection conducted on 8/22/24 (Doc #717300015) the repaired section of flowline was completed using 3" fiberglass pipe materials in the area of failure. Please provide updated details of actual repair completed in the CA section of ECMC Supplemental Form 19.	KPK has corrected the details of the line size and type on the form 19 closure request document number 404072898.	Closed	2/26/2025	404072898

Notes:
NA - not applicable