U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Petra Chemical HCl - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial and Final POLREP
Petra Chemical HCl
Dallas, TX
Latitude: 32.8620410 Longitude: -96.8763290

To: Mark Hansen, Superfund Division
Jeff Lewellin, TCEQ
Dana Tulis, U.S. EPA HQ

From: Adam Adams, OSC
Date: 6/29/2010
Reporting Period: 06/29/2010

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	PRP	**Incident Category:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/29/2010	**Start Date:**	6/29/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Emergency Response

1.1.2 Site Description
At 0956 hours on 29 June 2010 the U.S. Environmental Protection Agency (EPA) received notification from the National Response Center (NRC Report number 945881) that approximately 3,000 gallons of Hydrochloric Acid had spilled from a 10,000 gallon Aboveground Storage Tank (AST) due to a mechanical failure. The incident location is Petra Chemical Company, a chemical blending and packaging facility located in a light industrial area within the city of Dallas that primarily manufactures bleach and disinfectants for industrial applications. The report was made by Dallas Fire HAZMAT whom responded and subsequently reported the incident that occurred at 2216 hours on 28 June 2010. The EPA Phone Duty Officer (PDO) activated the on-call EPA On-Scene Coordinator (OSC) and the Superfund Technical Assessment and Response Team (START). The EPA and START arrived on-site at 1030 hours on 29 June 2010.

According to the Potentially Responsible Party (PRP), the 10,000 gallon AST containing 32% HCl had released between 1,200 and 1,400 gallons of 32% HCl into secondary containment. Approximately 300 to 400 gallons of the HCl had breached secondary containment via a corroded rainwater drain cap and into the surrounding ground.

1.1.2.1 Location
The facility is owned and operated by the Petra Chemical Company located at 2929 Storey Lane, Dallas, TX 75220 in Dallas County. The approximate 90,000 square foot facility has been Petra Chemical Company for approximately 22 years.

1.1.2.2 Description of Threat
Heavy rains have been falling intermittently since the time of the release with more precipitation forecasted for the next several days. A HCl runoff into a water drainage canal directly behind the facility is probable if the released material is not contained and recovered of in a timely manner.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
Off-site runoff water measured pH values ranging from 5 to 13, with the majority of measurements around pH 10. On-site assessment found two separate areas of concern regarding pH measurements in two separate areas of the facility, the HCl release on the west side of the facility with a low pH and the loading area on

the north side of the facility with a high pH, both of which impacted the drainage canal to the northwest of the facility along the tracks.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA arrived on-site to conduct an investigation on the morning of 29 June, 2010. During the course of the investigation, EPA along with representatives from TCEQ and the City of Dallas discovered significant amounts of facility runoff water with pH values greater than 10 and as high as 13. Runoff water discharged is drained from site through an underground pipe system which is discharged into a drainage ditch at the back of the facility. The high pH runoff water was traced back to the facility's tanker railcar loading rack on the north side of the facility and the truck offloading area located on the south side of the facility.

2.1.2 Response Actions to Date

At the time of EPAs arrival, PRP cleanup contractors were completing the process of removing HCl solution from the secondary containment and making preparations to recover impacted soils and impacted liquid from outside the secondary containment. The area of soil impacted outside the containment wall was then drained and removed to a depth of 6-12 inches. Soil samples were taken and tested on site for pH during the excavation process to evaluate extent of excavation required based on pH values outside the range of 6 to 9.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The PRP is Petra Chemical Company located at 2929 Storey Lane, Dallas County, Dallas, TX.

2.1.4 Progress Metrics

Per the PRP and PRP Contractor, approximately 35 cubic yards of soil were excavated and stored in rolloff boxes for disposal. Approximately 1,200 to 1,400 gallons of HCl contaminated liquids were recovered and stored in 13 totes (250 to 300 gallon capacity) for treatment/reuse by Petra Chemical Company. Approximately 2 totes were also filled with contaminated liquids from outside the secondary containment area and will also be assessed and processed by Petra Chemical Company either for reuse or disposal.

2.2 Planning Section

2.2.1 Anticipated Activities

The excavated area will be backfilled with clean soil. The water in the drainage canal impacted by the high pH runoff will be collected using a vacuum truck. An earthen dam or containment mechanism will also be placed on-site to prevent facility runoff water from entering the canal in the short term. PRP indicated a more permanent means to contain runoff from the site will be conducted to prevent future off-site impacts from the facility.

2.2.1.1 Planned Response Activities

PRP was asked to submit a plan to correct the high pH runoff. EPA will work with state and local officials to insure corrective actions are completed.

2.2.2 Issues

Chances of heavy rain are possible in the next few days.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

Agencies involved in the response include EPA, TCEQ, and the City of Dallas.

3.2 Cooperating Agencies

4. Personnel On Site

Personnel on-site include the PRP, PRP Response Contractor, EPA, TCEQ, and City of Dallas.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be obtained from the website www.epaosc.org/PetraChemicalHCl.

6.2 Reporting Schedule

No additional POLREP's will be completed.

7. Situational Reference Materials

No information available at this time.