U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
US Oil Recovery - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial
US Oil Recovery
A6X7
Pasadena, TX
Latitude: 29.7177400 Longitude: -95.2210530

To:
From: Adam Adams, OSC
Date: 7/2/2010
Reporting Period: First 24 Hours

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	7/1/2010	**Start Date:**	7/1/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Response/Emergency Removal Action

1.1.2 Site Description

US Oil Recovery is located on approximately 13 acres of land just north of the City of Pasadena, Texas north of Texas Highway 225. US Oil Recovery performed municipal and industrial wastewater pretreatment of Class I and Class II wastewater, characteristically hazardous waste, used oil and oily sludges, and municipal soild waste.

1.1.2.1 Location

US Oil Recovery is located at 400 N. Richey, Pasadena, Harris County, Texas 77506.

1.1.2.2 Description of Threat

Approximately 200 roll-off boxes (most labelled "Hazardous Waste Oct 09" or "Hazardous Waste Dec 09"), approximately 250 plus drums and approximately 200 plus 300 gallon totes are located throughout the site in no particular arrangement. A number of the roll-off boxes are not properly secured and open to the elements. A retention pond is located on the western side of the site and contains unknown chemicals. Additionally, there is a tank battery on the north end of the facility that contains approximately 24 aboveground storage tanks (AST's). The integrity of the AST's and secondary containment are not determined, but signs indicate potential issues. There is a large bioreactor on the northwest corner of the property that has no secondary containment and deteriorating walls. There are no employees operating the facility, and restriction of access. Any significant rainfall could and would cause an overflow of the retention pond, some rolloff boxes, the tank battery containment, and several on-site basins. Drainage is to primarily to the north and to the west, both directly flowing into Vincent Bayou, approximately 100 feet from the property line.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Historical inspections/investigations conducted by the Harris County Public Health and Environmental Services and the Texas Commission on Environmental Quality have shown elevated levels of benzene and

chlorinated solvents in some of the waste stored on-site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

US Oil Recovery opened for business in May 2002 in Pasadena, Texas to handle used oil. In its proprietary plant, US Oil Recovery performed municipal and industrial wastewater pretreatment of Class I and Class II wastewater, characteristically hazardous waste, used oil and oily sludges, and municipal solid waste. The facility is located on approximately 13 acres located north of the City of Pasadena at 400 N. Richey.

2.1.2 Response Actions to Date

On 1 July 2010 Harris County Public Health and Environmental Services (HCPHES) contacted the National Response Center (NRC) at approximately 17:27 to file a report (NRC # 946255) concerning an ongoing release from US Oil Recovery located at 400 N. Richey. The reported indicated the company had vessels and tanks containing hazardous waste that were actively leaking and contaminating Vincent Bayou. EPA Phone Duty Officer activated OSC Adam Adams and START to respond to the incident. OSC Adams and START mobilized to the site and conducted an external site walk at 10:00 pm due to limited site access, limited visibility, and flooding.

On 2 July 2010 EPA OSC Adams, TCEQ, HCPHES, and START mobilized at approximately 07:45 to the site and conducted a perimeter site walk. During the intial site visit EPA, TCEQ, HCPHES, and START noted material actively flowing off-site, roll-off boxes labeled as containing hazardous waste and having no tarp cover, and a large break in the perimeter fencing on the northwest side. Based on these observations, EPA OSC Adams rerequested access to the property from the property owner's legal counsel.

At approximately 12:38 OSC Adams received a signed access agreement from the attorney representing US Oil Recovery granting unconditional access to the property for response action. OSC Adams, TCEQ, and START entered the site to begin the detailed site assessment. During the assessment EPA observed an uncontrolled release of liquids from the retention pond, secondary containments, and roll-off boxes labelled as containing hazardous waste. Based on these visual observations, EPA OSC Adams actived the Emergency and Rapid Response Services (ERRS) contractor to the site to stablize the site and prevent further migration of site related constituents off-site.

At approximately 1440 the ERRS contractor arrived on-site and began stabilizing the site. Site stabilization activities included the lowering of liquids in critical roll-off boxes, secondary containment areas (areas that were actively overflowing), and pooled areas throughout the site. ERRS also deployed hard and sorbent boom and sorbent pads to minimize the off-site migration of contaminants.

The site received approximately 7 to 12-inches of rain during the day causing Vince Bayou to flood N. Richey street, minimizing site access and preventing additional resources and equipment to mobilize to the site. At the one point during the day, N. Richey street directly in front of the site access was covered by over 4 feet of water, and Vincent Bayou had raised to within 15 feet of the property fenceline.

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

The Potential Responsible Party is US Oil Recovery, LLC.

2.2 Planning Section

2.2.1 Anticipated Activities

On 3 July 2010 additional supplies and equipment to include frac tanks will be mobilized to the site to further stablize the site, contain uncontrolled materials, and allow for a more detailed investigation. After the site is stabilized, a detailed investigation will be conducted to determine threats and hazards.

2.2.1.1 Planned Response Activities

ERRS will mobilize frac tanks to allow for bulk storage of contact water contaminated by overflowing rolloff boxes, secondary containments, and containers on-site. Site control will be maintained. Site will be further secured from public access.

2.2.1.2 Next Steps

2.2.2 Issues

Due to the severe rain (approximately 7 plus inches), site progress was slow due to limited access to the site for equipment and resources. Primary objectives during the significant rain event were to contain contamination from off-site migration.

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

3.2 Cooperating Agencies

Cooperating and assisting agencies involved in the site are the Texas Commission on Environmental Quality (TCEQ) and Harris County Public Health and Environmental Services (HCPHES).

4. Personnel On Site

Personnel on-site include EPA, START, and ERRS.

Additional personnel on-site at their discretion are representatives from TCEQ and HCPHES.

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/USOilRecovery-Pasadena.

6.2 Reporting Schedule

Additional POLREP's will be provided as the response efforts continue.

7. Situational Reference Materials

Additional information can be obtained from the website www.epaosc.org/USOilRecovery-Pasadena.