

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #3
Progress Report
US Oil Recovery
A6X7
Pasadena, TX
Latitude: 29.7177400 Longitude: -95.2210530

To:
From: Adam Adams, OSC
Date: 7/15/2010
Reporting Period: Week 2

1. Introduction

1.1 Background

Site Number:	A6X7	Contract Number:
D.O. Number:		Action Memo Date:
Response Authority:	CERCLA	Response Type:
Response Lead:	EPA	Incident Category:
NPL Status:	Non NPL	Operable Unit:
Mobilization Date:	7/1/2010	Start Date:
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 solid waste.

1.1.2.1 Location

US Oil Recovery is located at 400 N. Richey, Pasadena, Harris County, Texas 77506. US Oil Recovery has an affiliated facility called MCC (USOR#2) that is located at 200 N. Richey, Pasadena, Texas 77506.

1.1.2.2 Description of Threat

Approximately 225 roll-off boxes (most labeled "Hazardous Waste Oct 09" or "Hazardous Waste Dec 09"), approximately 600 plus drums and approximately 100 plus 300 gallon totes are located throughout the site in no particular arrangement. A number of the roll-off boxes were not properly secured (i.e. missing/damaged tarps, poles, or bows) 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 in the future. There is a large bioreactor on the northwest corner of the property that has deteriorating walls and a secondary containment approximately 1 foot above ground surface. There are no employees operating the facility nor any public access restriction. 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 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.

Of the drums staged in the facility warehouse, a large portion are not in transportable condition. Most of the drums' contents are not consistent with the drum labels (i.e. drums with "NonHaz" labels containing flammables or corrosives). Some drums are leaking, and some are not sealed with the appropriate lids, bungs, or drum rings). Some corrosives are stored in metal drums, as well as acids and bases stored side by side.

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. The MCC facility is located on approximately 5 acres located north of the City of Pasadena at 200 N. Richey with a mailing address and business office at 400 N. Richey.

2.1.2 Response Actions to Date

Response efforts continue to include both the USOR facility located at 400 N. Richey Street as well as the connected MCC (USOR#2) facility located at 200 N. Richey Street. To date, a total of 15 FRAC tanks and 4 pumps are in use to contain and maintain site contact water and leaking containment areas. Two FRAC tanks and the vacuum truck were demobilized. ERSS and START continued to collect samples for waste characterization and profiling for disposal and assessment of site runoff and containment areas. Preliminary analytical results for assessment samples collected at USOR and MCC indicated levels of BTEX, acetone, and phenol among other organic constituents. Analytical results for waste characterization of the contents in the FRAC tanks from NTF, STF, and parking lot at USOR and the Z-Tank at MCC indicated low pH levels. A generator profile was submitted to Intergulf for disposal. ERSS coordinated transport and disposal for the week of 19 July.

Drums, totes, and containers on-site continued being assessed, inventoried, and segregated to ensure all containers are stable and not staged in an unsafe manner according to contents: flammable/combustible, corrosive-acidic, corrosive-basic, and non-hazardous material/universal waste. To date a total of 409 drums have been inventoried and 143 assessed.

Of the 225 roll-off boxes staged throughout the site, 64 needed some mechanism of address to eliminate the threat of overflow and migration off site. Issues resolved include leaks, tarps with holes, missing tarps, missing or damaged pipes, and missing or damaged bows, all of which can result in an overflowing roll-off box. As of July 15, all 225 roll-off boxes are securely covered and not posing an imminent threat to human health and the environment from the rolloff boxes being rained on and overflowing.

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

The Potential Responsible Parties at this time are US Oil Recovery, LLC and MCC (USOR#2), both with the same owner.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Continue maintenance operations on containment areas located at USOR and MCC. Continue to assess, inventory and segregate drums, totes, and containers on-site to ensure all containers are segregated correctly, stable and not staged in an unsafe manner. Continue to coordinate the transport and disposal of the accumulated and contaminated runoff and stormwater.

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.