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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #5**
Final
US Oil Recovery
A6X7
Pasadena, TX
Latitude: 29.7177400 Longitude: -95.2210530

To:
From: Adam Adams, OSC
Date: 8/5/2010
Reporting Period: 07/01-08/02/2010

1. Introduction

1.1 Background

Site Number:	A6X7	**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:	8/2/2010	**Completion Date:**	8/2/2010
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. 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

225 - 25 cubic yard roll-off boxes (most labeled "Hazardous Waste Oct 09" or "Hazardous Waste Dec 09"), 797 - 55 gallon drums and 212 - 300 to 400 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 containments 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 were no employees operating the facility nor any public access restriction at the time of the response. Prior to any response efforts, any significant rainfall could and would cause an overflow of the retention pond, some rolloff boxes, the tank battery containments, 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 were not consistent with the drum labels (i.e. drums with "NonHaz" labels containing flammables or corrosives). Some drums were leaking, and some were not sealed with the appropriate lids, bungs, or drum rings). Some corrosives were stored in metal drums, as well as acids and bases stored side by side.

The contents of the totes staged in the warehouse were not consistent with the tote labels. Most of the totes were marked with computer generated "Universal Waste" labels and contain flammables and corrosives.

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

During the week of 26 July, site stabilization efforts continued to include both the USOR facility as well as the connected MCC (USOR#2) facility with on-site security continued at both sites. The contents in the secondary containment of the basic and acidic tanks were pumped into separate truck bays due to acute structural damage of the secondary containment walls. Neutralization of the corrosives from the two secondary containments, from the filter press area, and FRAC tank A-1331was conducted for disposal. The remaining 40,000 gallons of neutralized non-hazardous material were transported off-site to Intergulf for disposal on 29 and 30 July.

The remaining drums and totes located on-site were assessed, inventoried, segregated, and staged in secondary containment areas located in the warehouse to ensure the containers were stable and not staged in an unsafe manner. Placards and paint markings were placed at each containment area according to drum and tote content field hazardous characterization analyses: red-flammable/combustible, white-corrosive/acidic, yellow-corrosive/basic, and green-non-hazardous material/universal waste.

The field hazard characterization analyses were conducted to ascertain the characteristic hazards of the containers (i.e. flammability, corrosivity) for appropriate storage and compatibility; however, the field hazard characterization analyses were not conducted to determine the presence or absence of hazardous compounds. The drums and totes marked with the green paint and are located in the placarded "Non-hazardous material" staging areas should not be assumed to be free of hazardous compounds, but should be assessed in more detail prior to disposal.

The containment areas were set up accordingly:

Containment A = Hazardous-Flammable/Combustible
Containment B = Non-Hazardous Material/Universal Waste
Containment C-1 = Hazardous-Flammable/Combustible
Containment C-2 = Non-Hazardous Material/Universal Waste
Containment D-1 = Empty Drums
Containment D-2 = Hazardous-Flammable/Combustible
Containment E-1 = Hazardous-Corrosive/Acidic
Containment E-2 = Non-Hazardous Material/Universal Waste
Containment E-3 = Hazardous-Corrosive/Acidic
Containment F-1 = Hazardous-Corrosive/Basic
Containment F-2 = Non-Hazardous Material/Universal Waste
High Hazard Containment A = Potential Oxidizers
High Hazard Containment B = H_2S
Tote Staging Area = Each row of totes is separated into one of the four designated classifications (Hazardous-Flammable/Combustible, Non-Hazardous Material/Universal Waste, Hazardous-Corrosive/Acidic, and Hazardous-Corrosive/Basic). No rows of incompatibles are staged next to each other.

The site was stabilized on 31 July and final written and photographic documentation of the site was conducted. During the response, a total of 225 roll-off boxes were secured; 797 drums and 212 totes were assessed, inventoried and segregated; and 392,000 gallons of non-hazardous material were transported off-site for proper disposal.

Demobilization of personnel and equipment was completed on August 2.

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

No additional EPA response activites are planned at this time.

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 at www.epaosc.org/usoilrecovery-pasadena.

6.2 Reporting Schedule

7. Situational Reference Materials

Additional information can be obtained at www.epaosc.org/usoilrecovery-pasadena.