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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #8**
Progress Report - Incident #2
US Oil Recovery
A6X7
Pasadena, TX
Latitude: 29.7177400 Longitude: -95.2210530

To:
From: Adam Adams, OSC
Date: 2/6/2011
Reporting Period: 11/29/2010 - 05/09/2011

1. Introduction

1.1 Background

Site Number:	A6X7	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	3/24/2011
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/8/2010	**Start Date:**	11/9/2010
Demob Date:	12/20/2010	**Completion Date:**	
CERCLIS ID:	TXN000607093, TXR000051540, TXR000079409	**RCRIS ID:**	
ERNS No.:	946255, 946854, 959001	**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 and 200 N. Richey, Pasadena, Harris County, Texas 77506.

1.1.2.2 Description of Threat

Separate incident from the response conducted in July 2010. HCPHES notified the National Response Center (NRC Report No.959001) to report a release of waste water from an unknown source at the facility. Drainage is primarily to the north and to the west, both directly flowing into Vince Bayou, approximately 100 feet from the property line. NRC notifed the EPA. Upon notification an EPA OSC and START-3 mobilized to the site to conduct a Tier 1 response on 08 November 2010.

Materials at the facility include solids, liquids, and sludges with hazardous characteristics that include flammables and corrosives. Assessment sampling from the July incident also indicated acetone, benzene, toluene, ethyl benzene, and xylene in some of the facility containments. The north and south tank farm secondary containments and several sumps and bays at the facility have historically overflowed directly into the parking lot, which overflows directly into Vince Bayou.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Due to heavy rains in the area, available freeboard located in the containment areas had become compromised and the contents were overflowing into the parking lot. Initial assessment included

the north and south tank farm secondary containment areas, sumps, bays, and a retention pond. Some characteristically hazardous drums and totes in the warehouse were leaking contents, thereby creating an additional safety concern.

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

During this operational period the EPA and their contractors continued emergency removal actions at the US Oil Recovery facility located at 400 North Richey, Pasadena, TX. EPA Emergency and Rapid Response Service (ERRS) personnel transferred the free phase oily liquid waste from hydrogen sulfide contaminated on-site above ground storage tanks in the north tank farm to the secondary containment prior to transport for fuel blending/disposal at the Intergulf facility. Free phase acidic oily liquids and sludges were also recovered from the secondary containments and loading dock bays and either neutralized prior to transport and disposal at Waste Management in Conroe, TX and US Ecology in Robstown, TX or stored in temporary on-site storage. Additional site stabilization actions included containment spray wash where needed, utilizing concrete to seal the secondary containment for T-40, and the management of the drums and totes inside the warehouse for continued segregation. Following demobilization of equipment from the site on 20 December 2010, the site was secured.

On 05 January 2011 EPA and their contractors mobilized to the MCC Recycling facility located at 200 Richey, Pasadena, TX following notification by the TCEQ of an active release from the northwest corner of the chlorine contact tank (Z-tank) into Vince Bayou. EPA ERRS personnel recovered approximately 50,000 gallons of oily liquid from the Z-tank prior to transport for disposal at the Intergulf facility. Upon assessment of the containment wall located at the northwest corner of the Z-tank where the release occurred, ERRS plugged the area to stabilize the containment wall. Following stabilization, the site was secured and personnel and equipment demobilized on 07 January.

On 25 January 2011, START-3 collected seven samples, including a field QC and trip blank, from the USOR property North and South Tank Farm secondary containments, concrete surface area, Sump Bay 36 and the upper 12 inches of the retention pond. Samples collected were analyzed for VOCs, SVOCs, TAL Metals/Mercury. The associated analytical results were loaded into a SCRIBE database.

On 03 February 2011 START was contacted by OSC Adams to conduct a site visit at USOR due to recent rain events and future forecast. Upon arrival to the site START documented the following site conditions: Less than 1-inch of free-board within both the north and south tank farms, approximately 2-inches of free-board within bay 36, and approximately 2-inches of freeboard within bay 48. Based on site conditions and future forecasts OSC Adams tasked START to transfer liquids from the north tank farm into bay 35 for temporary storage until a response action could be conducted. START transferred approximately 1,000 gallons of liquids from the north tank farm into bay 35 for temporary storage.

START returned to the site on 04 February 2011 to document site conditions. START observed that there were no changes in site conditions due to the rain received on-site overnight. Due to freezing weather and poor road conditions a response action could not begin until 05 February.

On 05 February 2011 START and EPA Emergency and Rapid Response Service (ERRS) personnel mobilized to the site to conduct emergency removal actions at the US Oil Recovery facility. ERRS crew pumped down approximately 30,000 gallons of free phase oily liquid waste contained within the north and south tank farms and bay 36 prior to transport and disposal at Intergulf for fuel blending/recycling. Following response activities, START documented available free-board: approximately 10-inches of free-board within the north tank farm, approximately 4-inches of free-board within the south tank farm and approximately 36-inches of available free-board within bay 36. The site was secured and equipment and personnel demobilized on 05 February.

During this response effort, approximately 440,000 gallons of hydrogen sulfide contaminated oily liquid were recovered from the poor condition above ground storage tanks; north and south secondary containments; sumps 34, 35, and 36; the parking lot; bays 45 and 48; and the Z-tank.

Cumulative waste volumes for all the incidents conducted at the Site are noted in the following table. Nonhazardous waste streams were generated from the neutralization of corrosives, treatment of hydrogen sulfide contamination, or from contaminated contact liquids which would carry the hazardous substances, pollutants, or contaminants off-site and into Vince Bayou.

Waste Stream	Disposal Facility	Incident Occurrence	Volume/Weight
Hazardous Sludge (Benzene)	US Ecology; Robstown, TX	Incident 2	11,751 gallons
Hazardous Sludge Washout (Benzene)	US Ecology; Robstown, TX	Incident 2	5 drums
Nonhazardous Sludge	Waste Management; Conroe, TX	Incident 2	89.36 tons
PPE/Solids/IDW	Waste Management; Conroe, TX	Incident 2	10 cubic yards

Nonhazardous liquids	Intergulf; Pasadena, TX	Incident 1	393,500 gallons
Nonhazardous liquids	Intergulf; Pasadena, TX	Incident 2	410,000 gallons
Nonhazardous liquids	Intergulf; Pasadena, TX	Incident 2	30,000 gallons
Nonhazardous liquids	Intergulf; Pasadena, TX	Total	833,500 gallons

On 01 March 2011, START-3 mobilized to the site to conduct sampling activities to support the Hazard Ranking System (HRS) package being prepared under a separate TDD. Sampling activities consisted of off-site soil, sediment, and surface water samples. START-3 also collected "waste" samples from USOR and MCC Recycling. All samples were submitted via the EPA Contract Laboratory Program (CLP) and/or the EPA Region 6 Laboratory. Upon completion of the sampling activities, the site was secured and personnel demobilized on 04 March.

On 21 April 2011, START-3 conducted a site visit to the USOR and MCC Recycling facilities based on an odor complaint received from a nearby business. During the site visit, START-3 conducted air monitoring for CO, H_2S, O_2, LEL, and VOC utilizing a MultiRAE. No readings above background levels were detected. START-3 documented site status through written and photographic documentation and briefed the EPA OSC on current site conditions. START-3 conducted a follow-up visit to the USOR facility on 25 April to assess drum and tote conditions. The area was noted as secured.

On 06 May 2011, START-3 conducted a site visit to the USOR facility. During the site visit several indications of possible trespass and vandalism were noted. Several totes appeared to have been tampered with. START-3 assessed the remaining totes and drums and briefed the EPA OSC. On 09 May, START-3 returned to the site to further investigate. START-3 conducted a visual inspection of the perimeter and found two areas where a trepass could occur. START-3 assessed the inside of the warehouse and noted the entry door to the lab had been compromised as well as the entry door to the emergency showers. START-3 conducted photographic documentation of these areas as well as the damaged totes. Upon departing the facility, the site was secured.

START-3 will continue to provide technical assistance on as-needed basis to the EPA OSC.

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

The Potential Responsible Party at this time is US Oil Recovery, LLC.

2.2 Planning Section

2.2.1 Anticipated Activities

Site stabilization efforts will continue as needed until the hazardous substances, pollutants, and contaminants are removed from the site.

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

2.5.1 Safety Officer

No incidents or injuries occurred during or prior to this operational period on this response.

Hydrogen sulfide was found at significant levels in the north tank farm during the recovery operation. Additional hydrogen sulfide personal dosimeters were utilized to further protect site personnel during all stabilization efforts.

2.6 Liaison Officer

2.7 Information Officer

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

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Texas Commission on Environmental Quality (TCEQ).
Harris County Pollution Control Services (PCS).

4. Personnel On Site

Personnel on-site as needed include EPA, START-3 contractors, and ERRS contractors.

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

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

Progress reports will continue as needed until a final POLREP is submitted.

7. Situational Reference Materials

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