

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
San Jacinto River Waste Pits TCRA - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #3
Site preparation resumes
San Jacinto River Waste Pits TCRA
06ZQ
Channelview, TX
Latitude: 29.7944000 Longitude: -95.0625000

To: Ragan Broyles, Superfund Division
Jeff Lewellin, TCEQ
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From: Valmichael Leos, RPM

Date: 2/16/2011

Reporting Period: 01/01/11 - 02/14/11

1. Introduction

1.1 Background

Site Number:	06ZQ	Contract Number:	
D.O. Number:		Action Memo Date:	4/2/2010
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	12/8/2010	Start Date:	12/8/2010
Demob Date:		Completion Date:	
CERCLIS ID:	TXN000606611	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

RP lead CERCLA time critical removal action

1.1.2 Site Description

The site encompasses approximately 25 acres. The removal action is to stabilize the site by designing and constructing a physical protective barrier surrounding waste ponds 1 and 2 that temporarily abates the release of polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (and possibly PCBs) into the San Jacinto River, until the site is fully characterized and a remedy is selected.

1.1.2.1 Location

The Site is in Harris County in the State of Texas. The Site itself has no specific street address. The Site is comprised of two waste ponds with three surface impoundments built in the 1960's. The ponds and impoundments are situated on a partially submerged 20-acre parcel of real property. The Site is located on the western bank of the San Jacinto River, in Harris County, Texas, immediately north of the Interstate Highway 10 (I-10) bridge over the San Jacinto River. Available information indicates the two waste ponds were built during 1965 by constructing berms within the estuarine area just north of what was then Texas State Highway 73 and is now I-10, west of the main river channel, east of the City of Houston, between two unincorporated areas known as Channelview and Highlands.

1.1.2.2 Description of Threat

The waste paper sludge was placed in the two ponds on the Site. Waste pond 1 is located on the western portion of the Site totaling 132,386 square feet. Waste pond 2 which consists of two surface impoundments are on the eastern portion of the Site totaling 46,182 square feet and 188,641 square feet respectively. Currently, the Site is inactive and approximately half of the Site's surface area, including the abandoned waste disposal ponds, is now submerged below the adjacent San Jacinto River's water surface. Waste pond 1 with one impoundment is partially submerged and waste pond 2 with the two impoundments is completely submerged in the San Jacinto River.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The primary hazardous substances documented at the Site are polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans. At the time of the signing of the Action Memo, dioxin concentrations as high as 41,300 parts per trillion have been found in sediment samples collected from the Site's disposal pond areas and hom river sediments near the Site. Sediments contaminated with high levels of dioxin have been found in the San Jacinto River both upstream and downstream from the Site due to tidal influences. Additional sediment samples were collected in compliance with the Action Memo, dioxin concentrations as high as 360,000 parts per trillion have been found in sediment samples collected from the submerged portion of the waste disposal ponds as well as dioxin concentrations as high as 3,660 parts per trillion action level in sediment samples collected outside the original 1966 berm placement for the two waste ponds indicating the release of dioxin from the original location of the waste ponds.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In accordance with the statement of work (SOW), in the EPA Administrative Order on Consent (AOC), the respondents International Paper Company Inc. (IP) and McGinnes Industrial Maintenance Corporation (MIMC) have 30 calendar days to begin construction for the time critical removal action. On November 8, 2010 the EPA finalized a work plan that details the construction of a temporary cap that will stabilize the release or threat of release of hazardous substances into the San Jacinto River.

2.1.2 Response Actions to Date

On January 5, 2011, EPA remedial project manager (RPM) Leos conducted a site inspection and documented that all on site field activities at the site have stopped. The Respondents have resumed some on site field activities on February 1, 2011 in preparation for implementing the time critical removal action.

To date, the respondents have begun conducting access road improvements along the Texas Department of Transportation (TxDOT) Right-of-Way (ROW) adjacent to the waste pits, mobilized office trailers for on site project management, and have received a limited amount of cover material which is being stockpiled for use on top of the waste pits.

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

Currently, EPA is working with International Paper Company Inc. and McGinnes Industrial Maintenance Corporation under an EPA issued Administrative Order on Consent.

2.2 Planning Section

2.2.1 Anticipated / Completed Activities

- The Respondents, Anchor QEA, and USA Environment, completed work on the following tasks:
- Engaged in construction activities at the Administration Site that included the following:
 - o Completed installation of electrical connections to the office trailers at the Administration Site. Activation of electrical service will occur after inspection by the utility company, planned for next week.
 - o Began installation of plumbing connections to the office trailers at the Administration Site.
 - o Began fence repairs around the perimeter of the Administration Site.
 - o Received and stored 10 rolls (15'x360') of Skaps GT142 geotextile at the Administration Site.
 - o Added barbed wire atop perimeter fence at the Administration Site.
 - o Administration Site signs approved by EPA were ordered on February 11, 2011.
- Engaged in construction activities at the LaBarge Site that included the following:
 - o Received Armor Cap D rock at LaBarge Site and managed Armor Cap D stockpile.
 - o Continued assembly of transport barge and barge-mounted equipment.
- Engaged in construction activities on the TxDOT right-of-way (ROW) that included the following:
 - o Installed silt fence along north side of TxDOT ROW in area between main access gate and west cell of the waste pits.
 - o Graded TxDOT ROW haul road to promote drying of soil.
 - o Mobilized roller to TxDOT ROW.
 - o Raised height of main access gate approximately 12 inches in preparation for haul road construction.
 - o Transported 4 rolls (15' x 360') of geotextile to TxDOT ROW in preparation for haul road construction.

- Contacted fencing company on February 10, 2011, to repair breach in Big Star fencing. Repairs scheduled to be completed by February 15, 2011.

2.2.1.1 Planned Response Activities

- Continue site preparation of lay down area and access road for mobilization of equipment and resources.
- Continued analytical laboratory testing of processed concrete and aggregate samples.
- USA Environment continued to develop remaining contractor draft work plans described in the approved Removal Action Work Plan.
- Continued developing on-site security plan to be used during active TCRA construction.
- Finalize remaining contractor work plans referenced in Section 4.4 of the approved TCRA Removal Action Work Plan.
- Ship next train load of natural stone aggregate (Armor Cap C) from the quarry to Texas City. This material will be stored in Texas City until space becomes available at the LaBarge Site, or within Laydown and Stockpile Area to be constructed in the TxDOT ROW.
- Take additional steps to address Site security.
- Continue to prepare the Administration Site including:
 - o Have electrical hookup inspected and activated.
 - o Finish communication and sewer hookups for the job-site trailers.
 - o Procure and install identification signs for the Administration Site.
 - o Develop plan for managing Site visitors, including Plans for providing safety briefing and maintaining a visitor log.
- Continue to prepare the LaBarge Site including:
 - o Complete barge preparation and loading of material for placement of armor cap.
 - o Continue to supplement stockpile of aggregate as space becomes available.
- On the TxDOT ROW, continue construction of the road and related improvements described in the approved RAWP, and construct additional improvements in the ROW as permitted by the access agreement with TxDOT.
- On the waste pits:
 - o Perform pre-construction bathymetric survey.
 - o Move buoys.
 - o Install silt curtain.
 - o Clearing and grubbing of the western cell.
 - o Commence installation of armor cap, provided weather delays do not significantly impact ongoing construction activities.

2.2.2 Issues

- No work as been completed on top of the waste pits as of February 16, 2001, and the Respondents are estimated to be a minimum two months behind schedule according to the current EPA approved work schedule.

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

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

POLREP #3 Last Updated 2/17/2011