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 #9**
Western cap completion
San Jacinto River Waste Pits TCRA
06ZQ
Channelview, TX
Latitude: 29.7944000 Longitude: -95.0625000

To:
From: Valmichael Leos, RPM
Date: 7/19/2011
Reporting Period: 06/04 - 07/19/2011

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 (1-10) 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 1-10, 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 I 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-pdioxins 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 in the 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 organic carbon normalized 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), 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 not in accordance with the Work Plan or the Work Plan Schedule. The Respondents resumed some on site field activities on February 1, 2011 in preparation for implementing the time critical removal action.

On February 17, 2011, the respondents began the waterside placement of armor cap D rock on top of the eastern waste pit cell. The eastern cell is under approximately 4 feet of water (during low tide) so placement of rock is being completed via barges stationed in the water alongside the eastern pit. Access road improvements along the Texas Department of Transportation (TxDOT) Right-of-Way (ROW) adjacent to the waste pits continue, preparation of office trailers for onsite project management is completed, and as of June 1, 2011 approximately 20,641 tons of Armor Cap D rock has been placed in the eastern cell.

On February 23, 2011, the respondents began the clearing and grubbing of the western cell in preparation for cap placement. The clearing and grubbing involves the use of an excavator that is removing large trees, shrubs, and vegetative debris that has grown on top of the western cell. All debris that may be potentially contaminated will be temporarily staged on top of the western cell. Any off site disposal of vegetative debris with visible contamination will be first sampled for disposal analysis and sent to the appropriate EPA approved subtitle C or subtitle D hazardous waste landfill.

On March 16, 2011, the respondents began the waterside placement of armor cap C on top of the eastern waste pit cell. As of June 1, 2011, approximately 9,708 tons of armor cap C has been placed.

On March 18, 2011, the respondents began the land side placement of armor cap A and B/C on top of the eastern cell. Similar to the waterside placement, a geotextile fabric is carefully placed on top of the eastern cell prior to the placement of rock. Some initial clearing and grubbing of shrubs and trees took place prior to the placement of rock along the central and southern berms along the eastern cell. As of June 1, 2011 approximately 12,459 tons of armor cap A and 1,927 tons of armor cap B/C have been placed.

On March 28, 2011, the respondents began the waterside placement of armor cap A on top of the Northwestern portion of the western waste pit cell.

Due to concerns raised by the EPA in a letter dated April 8, 2011about the displacement of waste

sludge in the Western cell during the clearing a grubbing operations, the respondents modified their approach by mixing portland cement into low lying areas in western cell for solidification and stabilization of waste prior to placement of the geotextile / geomembrane fabric and armor cap.

On May 19, 2011, the respondents finished the waterside placement of the armor cap in the Eastern cell pending final hydrographic surveys for any rework areas.

On June 2, 2011, the respondents began the land side placement of the armor cap in the Western cell. Placement of the armor cap followed the completion of the western cell preparation which included clearing and grubbing on site vegetation, solidification of low lying areas, shaping and grading, placement of granular fill, and installation of geotextile fabric and geomembrane liner.

On July 12, 2011, the respondents finished the land side placement of the armor cap in the Western cell.

Total approximate rock placed (armor cap A, B/C, C, and D) as of July 18, 2011 is approximately 58,698 tons which is 100% of the entire project.

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

Currently, EPA is working with Respondents International Paper Company Inc. and McGinnes Industrial Maintenance Corporation under an EPA issued Administrative Order on Consent. In December 2010, Respondents did not complete certain Work activities in accordance with the Work Schedule and stopped all Work activities on January 5, 2011 in violation of the AOC. The EPA issued Notice of Violation Letters on January 14, January 21, January 24, and March 3, 2011 for noncompliance with the AOC. Respondents have requested EPA to excuse their noncompliance with the AOC due to force majeure. The EPA has reviewed the record and determined that there is no evidence of a force majeure event. Respondents are in the process of correcting their noncompliance with the AOC. On March 3, 2011 the EPA issued its first status of noncompliance letter to Respondents documenting the first corrections to their noncompliance activities under the AOC.

2.2 Planning Section

2.2.1 Anticipated Activities

- Complete the survey of armored cap thickness via probing
- Breakdown and demobilization of equipment used for barge-based rock placement
- Schedule a final inspection and walk through with EPA
- Schedule meeting with EPA to discuss the final report and operations and maintenance (O&M) planning activities

2.2.1.1 Planned Response Activities

- Demobilization of Admin area
- Construction of concrete molds for pop-up signs

2.2.1.2 Next Steps

- Draft final report and submit to EPA for review and approval
- After final report is finalized and approved, EPA will issue a final POLREP for TCRA construction activities

2.2.2 Issues

- None

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.