

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Rogers Delinted Cottonseed Company - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #1  
Initial Polrep  
Rogers Delinted Cottonseed Company  
TXD980873160  
Robstown, TX  
Latitude: 27.8039000 Longitude: -97.6479000

**To:**  
**From:** Gary Moore, FOSC  
**Date:** 8/25/2011  
**Reporting Period:**

1. Introduction

1.1 Background

<b>Site Number:</b>	TXD980873160	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/21/2011	<b>Start Date:</b>	8/22/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	TXD980873160	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	08/19/2011
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

Emergency Removal Action

1.1.2 Site Description

Rogers Delinted Cottonseed Company (RDCC) operated a wet acid cotton seed delinting process at the Robstown, TX facility between 1962 and 1984. The delinting process utilized highly concentrated sulfuric acid (97%) to dissolve cotton fibers from the seed. A portion of the seed was treated with a fungicide and insecticide. The sulfuric acid was stored in an aboveground storage tank with a capacity of approximately 12,000 gallons. Used acid and rinsewaters were discharged from the process sump through an underground clay pipe to a series of four (4) evaporation ponds. One of the ponds (Pond #1) was closed in 1982 under a State approved closure plan, but the other ponds (Ponds #2, 3, and 4) were not closed according to the plan.

In 1984, RDCC was purchased by Yazaki USA. Yazaki's interest in RDCC was in its development of a gossypol-free cottonseed which could be used for food, but Yazaki never operated the Robstown facility. In 1985, EPA issued a Consent Agreement and Final Order requiring closure of Ponds #2, 3, and 4 under an approved closure plan. Yazaki installed a groundwater monitoring system at the facility in 1986, but the evaporation ponds were not closed according to an approved closure plan. A PR/VSI Report was prepared in 1987. Mr. Yazaki passed away in 1997 and the property has since been foreclosed upon by the taxing entities.

The facility consists of 4 structures. There is an office/scale house, process building/cotton storage, product/material warehouse, and an outdoor open air storage (ie. pole barn). Additionally, the site has an acid storage tank, and cottonseed processing equipment (various hoppers, delinting equipment, and a pesticide application room).

1.1.2.1 Location

The location is Hwy 77 Business, Robstown, Nueces County, TX. The GPS Coordinates for the site are: Latitude: 27.8039000 Longitude: -97.6479000. The facility is located just north of the Robstown Waste Water Treatment Plant which is located at 1250 N Hwy 77 Business.

### 1.1.2.2 Description of Threat

The property is unfenced with evidence of trespassing (graffiti and paint ball cartridges and pellets). The acid storage tank has ruptured and there is significant quantities accumulated acid salts. Additionally, the pesticide application room is laced with pesticide contaminated debris and has a very pungent odor. In addition, there is evidence of spills of what is believed to be the pesticides Demosan and Phorate.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On August 15, 2011, the EPA began a removal assessment of the Rogers Delinted Cottonseed Company (RDCC) Site. This assessment revealed the hazards describe above as well as the determination of the presence of lead based paint on deteriorating equipment. As a result of this information, EPA OSC Moore determined that an emergency removal action was warranted.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The Response actions to be conducted as part of this Emergency Removal Action are as follows:

- Remove acid salts from acid tank and surrounding soils;
- Decontaminate/Neurtralize Interior Tank Metals;
- Neutralize remaining impacted soils surrounding acid tank;
- Remove pesticide contaminated debris from within pesticide application room;
- Decontaminate pesticide application room with soap/water wash;
- Remove potentially contaminated debris within process and warehouse buildings;
- Decontaminate process and warehouse buildings with soap/water wash;
- Dispose of waste generate by the cleanup.

#### 2.1.2 Response Actions to Date

To date we have completed the following actions:

- Removal of pesticide debris from within pesticide application room;
- Removal os acid salts from acid tank and surrounding soils;
- In the process of removing potentially contaminated debris within process and warehouse buildings;

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

There are no viable PRPs associated with this site. The previous owner died and his company has dissolved. There are no other known PRPs associated with this site. This is being handle as a fund lead response.

#### 2.1.4 Progress Metrics

OSC Moore anticipates this action to be completed on or before September 2, 2011.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

##### 2.2.1.2 Next Steps

Upon completion of the removal of potentially contaminated debris within the process and warehouse buildings, we will begin decontamination activities by pressure washing the interior equipment and concrete flooring within the buildings. Additionally, we will be neutralizing soils around the acid tank and the delinting equipment. The final step will be disposal of the accumulated waste.

#### **2.2.2 Issues**

We anticipate no issues associated with this 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**

No information available at this time.

### **3. Participating Entities**

No information available at this time.

### **4. Personnel On Site**

The personnel onsite associated with this actions are as follows:

- 1 EPA OSC
- 1 START Contractor
- 1 ERRS Response Manager
- 1 ERRS Field Clerk
- 1 ERRS Equipment Operator
- 2 ERRS Labors
- 1 ERRS Subcontract Air Mover Operator

### **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.