

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
USOR-PRP - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #1
Progress
USOR-PRP
A6X7
Pasadena, TX
Latitude: 29.7176340 Longitude: -95.2211820

To:
From: Adam Adams, OSC
Date: 7/1/2012
Reporting Period: 10/1/2011 - 6/21/2012

1. Introduction

1.1 Background

Site Number:	A6X7	Contract Number:	
D.O. Number:		Action Memo Date:	3/24/2011
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/1/2011	Start Date:	10/1/2011
Demob Date:		Completion Date:	
CERCLIS ID:	TXN000607093	RCRIS ID:	
ERNS No.:	946255, 946854, 959001	State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

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

EPA has responded on three occasions to stabilize the USOR/MCC properties from uncontrolled releases of hazardous substances into Vince Bayou. Actions were initiated in July 2010, November 2010, and February 2011 under two separate Action Memorandums. EPA has removed 11,751 gallons of benzene contaminated hazardous sludge; 5 drums of benzene contaminated sludge washout; 89.36 tons of containment sludge; 10 cubic yards of PPE and IDW; and 833,500 gallons of contaminated storm water. EPA has assessed, segregated, and contained 974 drums and totes of flammables, acids, bases, combustibles, non-flammables, and unknowns. EPA has secured, repaired, or replaced 225 roll-off container tarps, bows, or poles to prevent storm water contact with high level benzene contamination. The Texas Commission on Environmental Quality (TCEQ) and Harris County Pollution Control Services (HCPCS, formerly Harris County Public Health and Environmental Services, HCPHES) have been involved prior to and during the EPA lead actions.

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.

Materials at the facility include solids, liquids, and sludges with hazardous characteristics that include flammables and corrosives. Assessment sampling conducted at the facility in July 2010 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.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Stabilization of the Site was transitioned to the PRP Group in the fall of 2011. PRP Group efforts are being conducted with EPA oversight and include monitoring, securing, and stabilizing the Site. Additionally, hazardous substances may be removed by the PRP Group as part of the stabilization effort if Site conditions warrant such a response. During this reporting period, the PRP Group has removed approximately 260,000 gallons of contaminated storm water, and is working to remove the Bio-reactor and its contents.

2.1.2 Response Actions to Date

During this operational period, the EPA and EPA START-3 contractors conducted oversight of the PRP Group site stabilization actions at the US Oil Recovery (USOR) and MCC Recycling properties located in Pasadena, TX.

On 21 October 2011, EPA conducted oversight of the Site stabilization activities to pump down the secondary containments to prevent a release to the environment. The PRP Group mobilized two frac tanks, two vacuum trucks, an air compressor, and one support trailer to the Site for operations. During the two-day operation, 40,000 gallons of liquid was removed from the North and South Tank Farm secondary containments and the Sump Bays. The liquid was pumped into the frac tanks for temporary storage pending approval for disposal.

On 7 November 2011, EPA conducted oversight of the Site stabilization activities by the PRP Group to divert stormwater away from Sump Bay 36 using sand bags and boom. The PRP Group mobilized one truck and a support trailer to the Site for operations. During the operation, the PRP contractor utilized sand bags, plastic sheeting, and boom to divert stormwater away from Sump Bay 36 and into the parking lot without coming into contact with contaminated areas.

On 02 December 2011, EPA conducted oversight of PRP Group operations to pump down the secondary containments to prevent a release to the environment. The PRP Group mobilized one Frac Tank, one 3 inch pump and one support trailer to the Site for operations. During the pump down operation, 10,000 gallons of liquid was removed from Sump Bay 36 and 10,000 gallons of liquid was removed from the North and South Tank Farm secondary containments. The liquid was pumped into the frac tank for temporary storage pending approval for disposal.

On 20 December 2011, EPA conducted oversight of PRP Group operations to transport liquids temporarily stored in three Frac Tanks from previous pump down operations to Intergulf for disposal. The PRP Group mobilized four tanker trucks to the Site for operations. During the operation, 47,500 gallons of liquid was removed from the Frac Tanks and transported to Intergulf for disposal.

On 21 December 2011, EPA continued to conduct oversight of the Site operations that included the demobilization of the three Frac Tanks located on-site. During the operation, it was discovered that one of the Frac Tanks owned by Baker would need repaired before the tank could be demobilized. Repairs scheduled for 22 December 2011. One Frac Tank owned by ETS was demobilized. The PRP Group conducted measurement of available freeboard in the North and South Tank Farm containments. Based on the availability of 3.5 inches in the North containment and 7 inches in the South containment, the PRP Group schedules a pump down operation for 22 December 2011.

On 22 December 2011, EPA continued to conduct oversight of the Site operations to pump down the North and South Tank Farm secondary containments to prevent a release to the environment. The PRP Group mobilized four tanker trucks to the Site for operations. During the pump down operation, 20,000 gallons of liquid was removed from the North containment and 10,000 gallons was removed from the South containment. A total of six loads were pumped directly from the containments into the tanker trucks and transported to Intergulf for disposal. In addition, the two remaining Frac Tanks owned by ETS and Baker were demobilized.

On 09 January 2012, EPA conducted oversight of Site stabilization activities by the PRP Group to pump down liquids from the North and South Tank Farm containments and Sump Bay 36 to prevent a release to the environment. The PRP Group mobilized five tanker trucks to the Site for operations. During the pump down operation, 9,800 gallons of liquid was removed from the North containment, 2,000 gallons was removed from the South containment, and 10,000 gallons was removed from Sump Bay 36. A total of five loads were pumped directly from the containments into the tanker trucks and transported to Intergulf for disposal. Conducted photo documentation of the containment areas and noted available freeboard at 23 inches in Sump Bay 36 and 6.5 inches in both the North and South containment areas.

On 10 January 2012, EPA continued to conduct oversight of the Site operations to pump down liquids from the North and South Tank Farm secondary containment. The PRP Group mobilized four tanker trucks to the Site for operations. During the pump down operation, 20,000 gallons of liquid was removed from the North containment and 10,000 gallons was removed from the South containment. A total of six loads were pumped directly from the containments into the tanker trucks and transported to Intergulf for disposal. Conducted photo documentation of the containment areas and noted available freeboard at 23 inches in Sump Bay 36, 15.5 inches in the North containment, and 13 inches in the South containment.

On 18 January 2012, START-3 conducted a site inspection of the USOR and MCC properties. Concerns include off-site migration of liquids and structural integrity of the Bio-reactor. START-3 conducted photo documentation of the Bio-reactor and noted several areas of continuing deterioration. No evidence of off-site migration of liquids was noted.

On 23 February 2012, START-3 conducted a site inspection of the USOR property. Concerns included recent rains in the area. The PM for the PRP Group was on-site and informed START of pump down operations conducted at the Site on 20 February 2012. START conducted photo documentation of the containment areas. Sufficient freeboard was noted. During the walk through of the drum storage area, evidence of a potential leak from several drums located in area D3 (flammable/combustible) was noted. Photo documentation was conducted of the area and the PRP Group was informed of the potential issue.

On 25 February 2012, START-3 conducted a site inspection of the USOR and MCC properties. Concerns included the location of the roll-off boxes staged in front of the filter press area of the warehouse and the location of equipment located east of the east gate of the MCC property. START conducted photo documentation of the roll-off boxes at the USOR property. Identification numbers were documented for cross referencing in the USOR container database. Based on the location of the roll-off boxes, removal of any equipment from the filter press area would require moving at least two roll-off boxes for access. The contents of each roll-off box would require removal first to prevent a release to the environment. START-3 conducted photo documentation of the equipment located on the east side of the MCC property. Based on the location, the equipment is accessible without any impact the environment.

On 14 March 2012, EPA conducted oversight of PRP Group operations to pump down liquids from the North and South Tank Farm containments and Sump Bay 36 to prevent a release to the environment. The PRP Group mobilized two tanker trucks to the site for operations. During the pump down operation, 15,000 gallons of liquid was removed from the North containment, 5,000 gallons was removed from the South containment, and 10,000 gallons was removed from Sump Bay 36. A total of six loads were pumped directly from the containments into the tanker trucks and transported to Intergulf for disposal. START conducted photo documentation of the pump down operations, roll-off boxes and equipment staged near the bio-reactor.

On 21 March 2012, EPA conducted oversight of PRP Group site stabilization activities to pump down liquids from the secondary containments and document available freeboard for the Bio-reactor. The PRP Group mobilized one tanker truck to the Site for operations. During the pump down operation, 5,000 gallons was removed from the South Tank Farm secondary containment and transported to Intergulf for disposal. START conducted photo documentation of the pump down operations and available freeboard for the Bio-reactor. START additionally conducted a site inspection of the MCC Property.

On 6 April 2012, START-3 conducted oversight of the Site stabilization activities operations to pump down liquids from the secondary containments and conduct a site walk. Pre-pump down available freeboard: North Tank Farm at 5.5" and Sump Bay 36 at 33". The PRP Group mobilized two tanker trucks to the Site for operations. During the pump down operation, 15,000 gallons was removed from the North Tank Farm secondary containment and 5,000 gallons was removed from Sump Bay 36. A total of 20,000 gallons was transported to Intergulf for disposal. Post-pump down available freeboard: North Tank Farm at 13" and Sump Bay 36 at 62". During an inspection of the tote staging area, it was noted that Tote TO-0035 was leaking from the valve area. START documented the concern and notified the OSC and Environ. Environ contacted Veolia to pump the product into a new tote and remove residue from affected area. START conducted written and photographic documentation of activity.

On 23 April 2012, START-3 mobilized to collect one surface water sample from a main waterline break near the USOR entrance that was discovered 22 April 2012. START-3 collected sample USOR-WW01-WL-120423 and USOR-FB01-120423. Prepared sample(s) for delivery to Accutest Laboratory for analysis of VOCs, SVOCs, total metals and mercury. START-3 conducted pH testing at leak site. pH 7. Additionally conducted a site inspection of the USOR Property. Activities documented by written and photographic means. START-3 secured the Site upon demobilization and delivered samples to laboratory for analysis.

On 25 April 2012, EPA conducted oversight of PRP Group operations collection of samples from the Bio-reactor and secondary containment areas for waste profiling. The PRP Group collected grab and composite samples from the oil and water phases of the Bio-reactor east and west chambers, the North and South Tank Farm, and Sump Bay 36 to be analyzed for TCLP SVOA, TCLP Metals, reactivity, corrosivity, and ignitability.

On 15 May 2012, EPA conducted oversight of the Site stabilization activities to pump down liquids from the secondary containments and to conduct a site walk. Pre-pump down available freeboard: North Tank Farm at 0.5", South Tank Farm at 4.5", and Sump Bay 36 at 13.5". The PRP Group mobilized two Frac Tanks to the Site for temporary storage of liquids pending new waste profile. During the pump down operation, 20,000 gallons was removed from the North Tank Farm secondary containment and placed into Frac Tank SV34790L. An additional 20,000 gallons was removed from the South Tank Farm and Sump Bay 36 and placed into Frac Tank SV33858L. Post-pump down available freeboard: North Tank Farm at 10.5" and Sump Bay 36 at 27.5". PRP Group collected additional composite samples from the oil and water phases of the Bio-reactor, the North and South Tank Farm, and Sump Bay 36 for waste profiling.

On 06 June 2012, EPA conducted oversight of PRP Group operations to remove the liquids temporarily stored in Frac Tanks SV34790L and SV33858L and transport to Intergulf for disposal under new waste profile for Uniform Hazardous Waste. The PRP Group mobilized two tanker trucks. During the removal operation, 20,000 gallons was removed from Frac Tank SV34790L and 20,000 gallons was removed from Frac Tank SV33858L and transported to Intergulf for disposal. Available freeboard of secondary containments were noted as: North Tank Farm at 14.5", South Tank Farm at 14", Sump Bay 36 at 36" and the retention pond at 12". START conducted a site walk of the USOR property. Evidence of potential vandalism was documented that included: a cart full of scrap metal tipped over in the parking lot, a

relocated trailer, and a relocated laboratory bottle. Two areas of concern were noted in the drum staging area and Frac Tank A1477B. Environ was instructed to place absorbent materials at each location.

On 06 June 2012, EPA approved the PRP Group Site Work Plan and associated documents including the Site Quality Assurance Sampling Plan (QASP), Bio-reactor Work Plan, Health & Safety Plan (HASP), and Quality Assurance Project Plan (QAPP) as required under Section VIII, Paragraph 16 of the Administrative Order on Consent (AOC) for the USOR and MCC Recycling Site (AOC Work Plan).

On 19 June 2012, EPA conducted oversight of the PRP Group Initial Site Assessment to determine baseline conditions at the Site. During the assessment START-3 conducted written and photographic documentation of the issues and concerns noted by the PRP Group. Air monitoring was conducted utilizing a PID and PDR monitor.

During the initial assessment of the roll-offs several were noted as having bungee cords that had rotted, gaskets that had begun to dry rot, and/or holes in the tarp. These were roll-offs that were not addressed as needing anything replaced in July 2010. Detections of 100 ppm for VOCs was detected at roll-off (RO-148) when the probe was placed at the location of a rip in the tarp.

The PRP Group assessed the drums and totes for leaks, bulges, and any other issues. Areas within the secondary containment of the drums (A, B3, C3, D2) were documented to be addressed to clean-up of liquids from previously documented leaks inside the containment. Several totes were noted as having developed small leaks at the valve, possibly due to the heat and general condition of the valve; TO-046 non-flammable, non-corrosive, pH 5; TO-077 Flammable, and; TO-123 Flammable. These were documented as needing addressed for stabilization.

The perimeter of the Site was walked and each fence pole was visually inspected for stability. Issues noted with perimeter security included missing barb wire, poles that need replaced and/or reset in the ground, and areas of fence that will require re-alignment and adjustment due to normal wear and tear.

As part of the baseline assessment, the secondary containment areas were measured for available freeboard: Bay 48 @ 17"; Bay 45 @ 17"; Sump Bay 36 @ 33"; Sump Bay 34 @ 25"; Sump Bay 35 @ 20"; STF @ 15", and; NTF @ 14". The retention pond continued to have approximately 12" of freeboard. The Bio-reactor was visually inspected for signs of deterioration.

On 21 June 2012, EPA conducted oversight of PRP Group operations to complete the Initial Site Assessment at the USOR property and the MCC property. During the assessment START-3 conducted written and photographic documentation of the issues and concerns noted by the PRP Group. Items noted during the assessment at MCC included:

A crack in the secondary containment wall on the north side of the Gravity Thickener was noted where the pipe from the pump house dissects the wall. The crack goes through the wall yet no evidence of staining was located outside the wall. Available freeboard was 24". A strong odor at the Oxygen Digester was noted. Air monitoring conducted using a PID monitor was non-detect for VOCs.

The west and east gates at MCC East were noted as needing repaired for site entry: both have binds at the roller mechanism. The west gate at MCC West was noted as off the roller track and hung up on the concrete drive. During the inspection of the perimeter fence, issues noted included missing barb wire, areas where the barb wire require tightening and both foot gates at the west side of East MCC will need hinge(s) tightened and/or replaced.

Completing the assessment at the USOR property, further evidence of trespass was noted, particularly in the warehouse. Chairs were located outside the lab, a ladder was placed at the electrical box, lab bottles were relocated, the contents of a small trash can was strewn near an area where two chairs were placed. Evidence of food and water consumption included a package of paper napkins and plates, used paper plates and an empty 1 gallon water container. The lab was vandalized: cupboard doors and desk drawers were left open and contents rifled through. A small transformer was also noted in the parking lot.

Based upon the baseline site assessment, the PRP Group will begin conducting bi-weekly site visits and conducting site actions to address the issues noted above.

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will continue to conduct oversight of PRP Group stabilization activities.

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.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

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

4. Personnel On Site

Personnel on-site as needed include PRP Group Contractors, EPA, and START-3 contractors. Additional personnel on-site at their discretion are representatives from TCEQ and HCPCS.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/USOR-PRP

(Stabilization actions lead by PRP Group - fall 2011 to present)

www.epaosc.org/USOilRecovery-Pasadena

(Stabilization actions lead by EPA - 07/10 to fall 2012)

7. Situational Reference Materials

No information available at this time.