

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Chemical Recycling - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Progress
Chemical Recycling
06NH
Wylie, TX
Latitude: 33.0078590 Longitude: -96.5495480

To:
From: Eric Delgado, OSC
Date: 1/16/2016
Reporting Period: 11 January 2016 – 23 January 2016

1. Introduction

1.1 Background

Site Number:	06NH	Contract Number:	
D.O. Number:		Action Memo Date:	4/20/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	12/16/2015	Start Date:	12/15/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Fund Lead Removal

1.1.2 Site Description

The site consists of an office and warehouse building located at the south end of the site. The main plant access road runs north-south to the east of the office and then splits east-west approximately 300 feet from the south boundary. Also visible on the property are two "experimental roads" that were reportedly constructed of stillbottoms and covered with gravel. One of these roads runs north-south from the east side of the production pad area, approximately 280 feet, to the "outer fence" boundary where it makes a "T." The other road was constructed primarily as a fire barrier and it runs north-south almost the entire length of the property. A small, circular pond is located in the central portion of the site immediately east of the main access road.

1.1.2.1 Location

The Chemical Recycling Site is located at 900 W. Kirby in Wylie, Collin County, Texas. The site encompasses a total of 5 acres, approximately 3.5 of which are within the on-site fencing. The former plant area is fully fenced. There is another fence, designated as "outer fence" running east-west approximately 160 feet north of the "north fence" of the plant area. The geographic coordinates of the site are Latitude 33.007870 North and Longitude -96.549580 West.

1.1.2.2 Description of Threat

Based on historical and current Removal Site Evaluation (RSE) information, the primary concern at the Site is the presence of hazardous substances (lead) distributed on surficial soils on site and the potential migration of the hazardous substances (lead) to the surrounding properties and trespassers on site. The Site is abandoned and is accessible to the local population; evidence of trespassing is apparent because homeless people have sought shelter in the vacated office building. The predominant threat to human populations is the potential exposure to the contaminated soils by the most sensitive populations. Exposure to these hazardous substances (lead) could be from ingestion and inhalation. Lead is a hazardous substance as defined in Section 101(14) of CERCLA, 42 U.S.C. 9601(14) and further defined by 40 C.F.R. 302.4. There is a potential for exposure of human populations and animals to toxic concentrations of the hazardous substances listed before by ingestion or inhalation of surficial soils found in the soil within the site boundary. The site is accessible to the public and the impact to the adjacent

neighborhood/trespassers is likely. Currently there is a fence surrounding the facility, but entry into the facility is easily accessible.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

From June 02, 2014 to June 23, 2014 the U.S. Environmental Protection Agency Region 6 (EPA) performed a RSE at the Site. The objectives of the RSE were to determine if the Site presented a threat to public health or welfare of the United States or the environment in accordance with *40 Code of Federal Regulations (CFR) 300.415* as well as the extent of such contamination.

The objectives of the RSE were achieved by evaluating historical data collected by the Potentially Responsible Parties (PRPs) and analytical results obtained during the removal site evaluation. Removal assessment activities included collecting soil samples from on-site source areas and from off-site locations to determine the nature and extent of site-related contamination. A geophysical survey was conducted to determine if underground structures, piping, and/or buried drums were present on-site and to serve as a precaution to identify unknown subsurface objects prior to conducting the soil sampling activities. In addition, the RSE included a limited asbestos survey of the on-site office/warehouse to determine the presence of Asbestos Containing Building Material (ACBM). A total of 118 drums located in the office/warehouse were sampled for waste characteristics [Toxicity Characteristic Leaching Procedure (TCLP)] during the removal assessment.

All soil sample results were compared to EPA Non-carcinogenic Industrial Removal Management Levels (RMLs). The site cleanup levels are set for Lead at 800 mg/kg in soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The removal action involves the removal of contaminated soils up to two feet below ground surface found on site. Hazardous substances will be profiled, packaged, and transported to off-site disposal facilities that are in compliance with the EPA Offsite Rule. All waste streams will be profiled and disposed of appropriately. Contaminated soil will be excavated and backfilled. The property will be graded and stabilized.

2.1.2 Response Actions to Date

During the period of 11 January – 16 January 2016, 12 grid excavations were completed to a depth of 6 – 12 inches below ground surface; excavated grids are located on the north portion of the site. Twelve confirmation samples were collected and shipped to ALS Environmental Labs, located in Houston, Tx for analysis of Lead contamination. One of the twelve confirmation sample results were above the Lead action level of 800 mg/kg, the associated grid will be excavated an additional 6 inches and re-sampled for Lead contamination. An estimated 540 tons of excavated soil has been transported to Maloy Landfill located at Campbell, TX. Air monitoring instruments were deployed daily to monitor for particulates in the air during excavation activities.

During the period of 18 January – 23 January 2016, 7 grid excavations were completed to a depth of 6 – 12 inches below ground surface; excavated grids are located towards the center of the site. Eight confirmation samples were collected and shipped to ALS Environmental Labs for analysis of Lead contamination and Hexavalent Chromium contamination. Two of the seven samples results were above the Lead action level of 800 mg/kg, the associated grids will be excavated an additional 6 inches and re-sampled for Lead contamination. All 7 confirmation samples were below the Hexavalent Chromium action level of 650 mg/kg. An estimated 850 tons of excavated soil has been transported to Maloy Landfill. Air monitoring instruments were deployed daily to monitor for particulates in the air during excavation activities.

On 01/21/16, during the excavation of grid B07, a drum was discovered around 12 inches below ground surface. Excavation activities were stopped as directed by EPA OSC. EPA will conduct a additional geophysical survey of the site now that structures/obstacles have been removed from the initial survey area.

To date, an estimated 1,700 tons of excavated soil has been transported of site to Maloy Landfill.

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

The Site PRPs formed a steering committee, the Chemical Recycling Incorporated Steering Committee and has elected not to perform the Removal Action.

2.1.4 Progress Metrics

Disposal metrics for the reporting period are below.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non- Haz Lead	Soil	~540 tons	1913085 - 1913111	None	Maloy Landfill
Non- Haz Lead	Soil	~1,160 tons	1913112 - 1913115 2945011 - 2945039	None	Maloy Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

The continuation of excavation for the remaining grids located in the southern portion of the site will resume after the completion of the geophysical survey. Geophysical survey is scheduled for Tuesday 1/26/16 to determine the location of potentially buried obstructions in the site. Backfill activities will commence for the northern portion of the site, an estimated 3 grids will be filled, compacted, and graded per day. Transportation of waste to a CERCLA approved disposal facility is also scheduled for the next reporting period.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

Front shovel excavator (2)

Dump truck - 9 yards (1)

Compact track loader (1)

Command Post

Generators (1)

Storage Container (2)

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

EPA On Scene Coordinator (1)

START Contractor (1)

ERRS Contractor (9)

5. Definition of Terms

OSC - On Scene Coordinator

ERRS - Emergency and Rapid Response Services

START - Superfund Technical Assistance Response Team

TCLP - Toxicity Characteristic Leaching Procedure

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

POLREPS will be issued biweekly

7. Situational Reference Materials

No information available at this time.