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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #3**
Final
Chemical Recycling
06NH
Wylie, TX
Latitude: 33.0078590 Longitude: -96.5495480

To:
From: Eric Delgado, OSC
Date: 2/8/2016
Reporting Period: 25 January 2016 - 29 February 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:	2/29/2016	**Completion Date:**	2/29/2016
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 33.00787o North and Longitude -96.54958o 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 substances 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 25 January – 30 January 2016, 6 grid excavations were completed to a depth of 6 – 12 inches below ground surface; excavated grids are located on the center portion of the site. Nine confirmation samples from current and previously excavated grids 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. No transportation and disposal activities occurred during this period. Air monitoring instruments were deployed daily to monitor for particulates in the air during excavation activities.

On 01/26/16, geophysical survey sub-contractor arrived on site to perform surveys on specific grids throughout the site. The northern portion of grid B07 was identified to have potential drums below ground surface and several spots surrounding the perimeter of B07 were identified. A total of 53 empty and collapsed drums were discovered at a depth between 2ft to 3ft, and 4 miscellaneous objects were also discovered around the perimeter.

During the period of 1 February – 6 February 2016, 6 grid excavations were completed to a depth of 6 – 24 inches below ground surface; excavated grids are located towards the south of the site. Seven confirmation samples from current and previously excavated grids were collected and shipped to ALS Environmental Labs for analysis of Lead contamination. All sample results were below the Lead action level of 800 mg/kg. An estimated 800 tons of excavated soil was transported to Maloy Landfill during this period. Air monitoring instruments were deployed daily to monitor for particulates in the air during excavation activities. Back fill activities commence as soil from Vrzalik Pit in Terrell, Texas arrive via transportation trucks. A total of 15 back fill transportation trucks each with an estimated 20 tons of soil arrived on site and a total of 23 out of 32 girds have been back filled to date.

During the period of 8 February – 10 February 2016, no excavation activities or sampling activities were completed. An estimated 1,000 tons of excavated soil was transported to Maloy Landfill during this period. A total of 8 back fill transportation trucks each with an estimated 20 tons of soil arrived on site and a total of 29 out of 32 grids have been back filled to date.

On 02/09/2016, monitoring well removing sub-contractor arrived on site to perform plug and abandon activities of 14 monitoring wells spread throughout the site. 1 of 14 monitoring wells were removed completely and the remaining 13 monitoring wells were plugged in place. Sub-contractors plugged all monitoring wells with bentonite and removed concrete pads. No visible monitoring wells above ground are visible on site.

On 02/10/2016, START and ERRS contractors demobilize from site for a scheduled site break. Operations will resume 21 February.

During the period of 21 February – 29 February, START and ERRS mobilized to site to begin excavation and sampling activities; 3 grid excavations were completed to a depth 6 -12 inches below ground surface located towards the south of the site. Three confirmation samples were collected and shipped to ALS Environmental Lab for analysis of Lead contamination. All samples results were below the Lead action level

of 800 mg/kg. An estimated 550 tons of excavated soil was transported to Maloy Landfill during this period. A total of 10 back fill transportation trucks arrived on site and all 32 grids have been back filled and graded to date.

To date, an estimated 4,200 tons of excavated soil has been transported from the site to Maloy Landfill.

On 02/29/2016, START and ERRS contractors demobilize from site; all activities on site have been completed.

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.

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Non- Haz Lead	Soil	~800 tons	2945040 - 2945079	None	Maloy Landfill
Non-Haz Lead	Soil	~1000 tons	2945080 - 2947935	None	Maloy Landfill
Non-Haz Lead	Soil	~550 tons	2947936 - 2947960	None	Maloy Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

Begin preparations for a Ready for Reuse determination for the site.

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)

Compact track loader (1)

Command Post

Generators (1)

Storage Container (2)

Bulldozer (1)

Compactor (1)

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 (4)

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

No information available at this time.

7. Situational Reference Materials

No information available at this time.