U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
A1 Custom Packaging Fire Response - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial
A1 Custom Packaging Fire Response
A6NE & V6RO
Houston, TX
Latitude: 29.8032383 Longitude: -95.5119141

To: Ronnie Crossland, US EPA R6
Anthony Buck, TCEQ
Reggie Cheatham, EPA HQ

From: Warren Zehner, FOSC
Date: 5/13/2016
Reporting Period: 5/5/2016 - 5/10/2016

1. Introduction

1.1 Background

Site Number:	A6NE & V6RO	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	5/5/2016	**Start Date:**	5/5/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:	E16613	**Reimbursable Account #:**	

1.1.1 Incident Category: Chemical Packaging Warehouse **-** CERCLA and OPA Emergency Response

1.1.2 Site Description: On 5 May 2016, at approximately 1000hrs a 4-alarm fire was reported at A-1 Custom Packaging (A-1) by the Houston Fire Department (HFD). Initially, a 0.75 mile radius shelter in place was issued due to unknown materials stored at the site. At approximately 1400hrs the shelter in place was lifted. A-1 was a warehouse facility suspected to be containing unknown chemicals that was believed to have included pesticides, herbicides, and fuel additives. Water runoff from the firefighting efforts migrated offsite transporting an oil material which appeared to be red-dye diesel among the other potential residues and chemicals involved in the warehouse fire. This runoff entered into a local tributary of Spring Branch Creek before flowing into the creek.

1.1.2.1 Location: A-1 Custom Packaging, 8960 Spring Branch Dr., Houston, TX 77080.

LAT 29.8032383 LONG -95.5119141

1.1.2.2 Description of Threat: The 4-alarm fire consumed the warehouse where an unknown amount of different chemicals were being stored. This created a smoke plume that traveled across Houston city limits as well as several neighboring municipalities. As a result of this smoke plume, a shelter in place was initiated for the surrounding communities as a precautionary measure. The City of Houston Fire Department (HFD) were on scene and actively trying to extinguish the fire as unknown chemicals mixed with firefighting waters flowed into on-site storm drainage inlets and entered a local tributary that then flows into Spring Branch. PRP representatives initially reported that the site contained pesticides, herbicides, and petroleum based fuel additives.

Approximately 3 miles of Spring Branch Creek was impacted. Impacted stretches of the Creek ran through residential areas of Spring Branch, TX. Visible fuel additive was observed flowing from the site and down into an unnamed tributary; thence into Spring Branch. The fuel additive impacted soil, vegetation, water, and wildlife between the facility and an intersection between Spring Branch and Memorial Drive. Spring Branch flows into Buffalo Bayou; thence to San Jacinto River, which meet the definition of "navigable waters" of the United States (US) as defined in Section 502(7) of the Federal Water Pollution Control Action (FWPCA). The fuel additive is believed is petroleum based and believed to be an OPA oil.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results: Much of the fire was out by

noon and the shelter in-place was lifted at 1400hrs on May 5, 2016. EPA became aware of the fire due to media reports. EPA OSC Martin and the EPA's Superfund Technical Assessment & Response Team (START-3) contractor were activated on 5 May 2016 to respond to the incident to assess ongoing operations and coordinate with on-site responders. OSC Martin arrived on-scene at approximately 1900hrs while START arrived at 1630hrs. Upon EPA's arrival, some fire suppression operations were still ongoing to contain a few hot spots within the facility. A small amount of firefighting water was continuing to migrate offsite via the nearby drainage ditch that leads to Spring Branch. It was unknown what chemicals were contained in the firefighting water, however it was reported to possibly contain pesticides and an oil that appeared to be red dye diesel. After arrival, the EPA began conducting air monitoring activities in the neighborhood area around the vicinity of the site. After the fire was extinguished, air monitoring continued through the neighborhoods, around local school properties, and along sections of impacted creek. To date, no elevated readings have been detected during these monitoring events. Air monitoring parameters included Oxygen (O2), Lower Explosive Limit (LEL), Carbon Monoxide (CO), Hydrogen Sulfide (H2S), and Volatile Organic Compounds (VOC).

The City of Houston (COH) contracted SET Environmental (SET) to respond to the incident. SET deployed hard and sorbent boom throughout the impacted segment of Spring Branch with the goal of blocking impacts from flowing downstream past the intersection with I-10. SET had a frac tank and vacuum truck onsite for the diesel recovery operations. SET also collected water samples in the area around the warehouse. Preliminary water sample results obtained from COH did not detect most constituents sampled for including herbicides, pesticides, VOC, and semi-volatile organic compounds (SVOC) at elevated levels; chemicals suspected of being involved in the fire. The runoff did cause fish kills in the creek. Representatives from the Texas Commission on Environmental Quality (TCEQ) were also on-scene and were prepared to take over the response and recovery operations when the Fire Department relinquished control of the site. The RP reported to have hired a cleanup contractor to start onsite activities the next morning.

Based upon the conversations with the responding agencies that contractors were on-scene containing and collecting the "red diesel" from the creek and that more resources would be deployed in the morning, OSC Martin demobilized from the site late at approximately 2200hrs but left START on-site to continue monitoring the situation and clean-up activities. OSC Zehner mobilized to the Site on 6 May to assist with the response activities. After evaluating the progress of the clean-up contractors, OSC Zehner activated ERRS under his warrant authority to respond early on 7 May.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative: Once the fire was extinguished on 7 May, a unified command (UC) was established. Agencies involved included EPA, Texas Department of Environmental Quality (TCEQ), Texas Parks and Wildlife Department (TPWD), COH, Harris County officials, and the Villages of Spring Valley and Hilshire. UC was established to facilitate discussion and planning for incident objectives, communicate issues, and coordinate response actions.

Initial objectives of the UC focused on site stabilization, containment and recovery of oil that had impacted Spring Branch Creek. Various tasks were assigned to responding agencies. TCEQ is overseeing the site stabilization and response actions nearest the facility and down the concrete lined section of Spring Branch Creek (approximately 1.25 miles) and is considered the CERCLA response activities. For the OPA funded portion of the response, EPA focused on the containment and recovery of the "red-dyed" oil in the remaining creek to Memorial Drive (approximately 1.5 miles). Approximately 60 responders are on scene. Booms, absorbent materials, pumps, and vacuum trucks have been used to collect oil. The oil was contained to Spring Branch Creek and has not impacted areas beyond Memorial Drive. To date, crews have recovered nearly 100,000 gallons of material from the creek primarily containing oil and oily water. Due to the relatively large amount of impacted wildlife, EPA subcontracted with a wildlife rehabilitator to tend to wildlife that had been impacted by the oil. The TPWD also assisted in this wildlife effort.

2.1.2 Response Actions to Date: On 9 May 2016, EPA collected samples of the fuel additive from the water surface of Spring Branch for analysis. Additional water samples along the impacted section of the creek were submitted to the lab for Chemical Oxygen Demand (COD). Results are expected to return within 24 hours. UC will continue water quality monitoring along impacted areas of the creek. Current monitoring results have shown that Dissolved Oxygen (DO) is low, but not at levels low enough to impact wildlife.

Approximately 40,000 gallons of firefighting water was also collected by EPA near the facility in support of TCEQ's . This material will be analyzed and disposed of utilizing CERCLA funding.

Remediation activities at the warehouse fire scene are currently being conducted by the PRP contractor, Denver Ward (Texas General Contractors). Activities have included an initial assessment of chemical categories that remain on site, as well as operations utilizing a vacuum truck to ensure no further materials leave the property. The TCEQ is overseeing the work conducted by the PRP's contractor.

TCEQ has initiated the scraping of ditches and residential areas impacted by the direct runoff from the site. EPA has agreed to arrange for the disposal of the material utilizing CERCLA funding.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs): On 10 May 2016, a Notification of Federal Interest (NOFI) as issue to the operator's onsite representative. Tracy Willis is listed as the business owner/operator (RN# 106546476), and is the responsible party of this incident.

TCEQ representatives have initiated a Tier 2 investigation to determine the chemical inventory pre and post fire. The findings will be used to determine if the facility met the regulatory notification requirements under Emergency Planning and Community Right-to-Know Act (EPCRA). Initial findings include that the list of chemicals remaining on the site were found to be greased and corrosive, environmentally hazardous epoxy mixes. PRP also indicated drums of organic acid, crude oil, and solvents among other unidentifiable chemical containers.

2.1.4 Progress Metrics: As of 10 May 2016, approximately 100,000 gallons of oil and oily water had been recovered from site runoff and Spring Branch. The recovered oil is scheduled to be sampled and sent to an approved waste disposal facility to be determined in the next few weeks.

2.2 Planning Section

2.2.1 Anticipated Activities: The PRP/RP is expected to continue site stabilization.

2.2.1.1 Planned Response Activities: EPA will continue the oil spill response, EPA is also providing CERCLA assistance for the disposal of waste generated during the response.

2.2.2 Issues: The facility has been unable to provide a complete inventory list at the facility prior to the fire.

2.3 Logistics Section

N/A

2.4 Finance Section

2.4.1 Narrative: EPA is utilizing CERCLA and OPA funding for the incident. An FPN has been opened with a ceiling of $750,000. A NOFI was issues to the operator/owner of the facility on 10 May 2016. The RP is Tracy Willis, business owner of A-1 Custom Packaging.

A ceiling of $200,000 for ERRS and $30,000 for START contracting services has been established for the CERCLA portion of the response.

2.5 Other Command Staff

N/A

3. Participating Entities

EPA, TCEQ, TPWD, COH, Hilshire Village, and Spring Valley Village.

4. Personnel On Site

4 EPA, 3 START, 39 ERRS.

5. Definition of Terms

N/A

6. Additional sources of information

https://www.epaosc.org/A1CustomPackaging

7. Situational Reference Materials

https://www.epaosc.org/A1CustomPackaging