

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Tuesday, September 11, 2007

From: Chris Ruhl

Subject: Agrifos Acid Spill

2001 Jackson Street, Houston, TX

Latitude: 29.7458000

Longitude: -95.3647000

POLREP No.:	3	Site #:	
Reporting Period:	9/10/2007 - 9/11/2007	D.O. #:	
Start Date:	9/7/2007	Response Authority:	CERCLA
Mob Date:	9/6/2007	Response Type:	Emergency
Demob Date:		NPL Status:	
Completion Date:		Incident Category:	
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

On 9/6/2007, EPA's R6 Emergency Response Team was notified of an ongoing release from Agrifos Fertilizer Inc. located at 2100 Jackson Road, Pasadena, TX. The National Response Center (NRC) has assigned the incident NRC # 847936. The release occurred when a retaining wall failed resulting in the discharge of process water from a large gypsum mound. The discharge is reported to exhibit a pH of 2, contain sulfuric and phosphoric acids, and metals. The USCG has confirmed a fish kill associated with the release with a noticeable "dead" zone. The RP has estimated that 10 million gallons of process water has been discharged since the incident began. It is estimated approximately 6 million gallons of process water has been pumped and discharged within the past two days. This discharge was pumped by the responsible party (RP) to reduce hydraulic pressure on the retaining wall and provide additional capacity for future rain events. The RP has requested an emergency discharge permit for the discharge from the Texas Commission of Environmental Quality (TCEQ). Currently, the release is an un-permitted discharge from the facility to Cotton Patch Bayou and then into the Houston Ship Channel.

It is estimated that 25-35 million gallons of process water is contained behind the retaining wall. An additional 175 million gallons of process water is contained within the impoundments located on the top of the gypsum mound. The RP is concerned about the potential catastrophic release of either of the impoundments. The facility has had similar releases from the facility in the past.

The USCG, TCEQ, and Harris County Pollution Control were responding to the incident.

Current Activities

OSC Ruhl briefed the personnel for the Enforcement, Multimedia Planning and Permitting Division, Office of Regional Counsel, and the Superfund Divisions. Ruhl provided a situational report, made resource request, and requested action items.

The facility continues to try to find disposal and disposal for the excess water. The facility continues to have no answer for the disposal, treatment, or storage beyond what they currently have. The facility continued to monitor the stacks to ensure that stacks are managed such as to prevent future release.

The RP had a gypsum stack expert conduct an assessment of the stacks to determine what the current conditions of the stacks were. A finalized report of his findings will be presented 0900, September 11, 2007.

The demolition of the wall has begun and the area where the initial breach occurred has been completed.

Planned Removal Actions

The RP continues to search for options for the disposal/treatment of the water. Several options were being considered as a solution. The water may be processed into a low grade fertilizer. The RP is looking into the permitting of this option. The facilities WWTP would be used to prepare the product. It is

estimated that the facility could use up to 1 million gallons of the material. If successful, the RP believe it will be able sell approximately 2 million gallons and irrigate another 20 million gallons on the facility property. The facility would use the West Jones area for application.

START-3 is continuing to monitor the pH levels of the water. There is an area in the retaining wall, downstream of the initial breach area, which has what appears to be gypsum seeping out of the wall. There is dead vegetation all along the area and the pH of the water that is collecting in the area is 2. START-3 has brought this area to the attention of USCG Commander Kammer and IC Kelly Wilson. Agrifo's engineers went and observed the area and it is being carefully monitored. START-3 will also continue to monitor this area.

Key Issues

- 1) The facility currently has 25-35 million gallons of water that needs to be removed to return the facility to a non-emergency situation. Remedies developed, proposed, and implemented will likely not be long-term solutions.
- 2) No additional storage capacity has been identified.
- 3) Any precipitation that is received by the facility add to the cumulative total of water that needs to be removed. 1" of rain is equal to 10.5 million gallons of additional water that must be removed.
- 4) The RP has begun the repair of the retaining wall.
- 5) Additional seeps have been observed along the retaining wall in the area of the original breach.
- 6) EPA regulatory programs are a heavily involved.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/Agrifos

POLREP #3 Last Updated 9/11/2007