United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Wednesday, September 19, 2007
From: Chris Ruhl

Subject: Continued Response Activities
Agrifos Acid Spill
2001 Jackson Street, Houston, TX
Latitude: 29.7458000
Longitude: -95.3647000

POLREP No.:	6	**Site #:**	
Reporting Period:	09/15 - 09/18/2007	**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 #:	TXN00606820	**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, Pasedena, 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
Agrifos continues to do treatment of residual contamination within the Harris County drainage ditch with fresh water flushing and appropriate applications of soda ash.

Agrifos continues to treat raw process water through its wastewater treatment facility and discharging directly to the Houston Ship Channel. Process water was diverted to Moat 1 (influent to treatment facility) to help reduce pond/moat levels. The diversion of process waters into Moat 1 and the treatment facility has been discontinued and flushing of Moat 1 to remove residual contamination has been started. The treatment facility continues to operate at 1 million gallons/day. Agrifos estimates another 9 million gallons (process water and flush water) will need to be treated prior to the plant returning to normal operating procedures. Upon the completion of this activity, the treatment facility will be operating under normal conditions of its TPDES permit.

EPA and Agrifos continue to collect water quality data (pH, dissolved oxygen, conductivity, and temperature) from the turning basin and Houston Ship Channel three times per day. Agrifos and EPA also continue to collect samples for analytical analysis from pre-determined sample locations with the turning basin, Houston Ship Channel, and the water treatment outfalls.

Agrifos and it contractor continue to repair the retaining wall where the intial breach occurred and secondary seeps. Seep repairs include installing a steel plate over the impacted area. The original breach location required complete demolition and re-construction. Agrifos anticipates the wall construction to be completed on 21 September 2007.

Agrifos and the Unifed Command continue to update the surrounding plants and neighbors with periodic response status updates.

Planned Removal Actions

Agrifos has hired a remediation company that will provide a plan for EPA, TCEQ and NRD trustees to review on Monday (September 24, 2007)for the environmental damage to the county ditch, Cotton Bayou, and the Houston Ship Channel.

Next Steps

1) Complete monitoring and end soda ash application in Moat 3, Cotton Patch Bayou and the barge slip areas of the Site.

2) Finalize scope for sampling and mitigation plan. Final comments due by 1500 on September 20, 2007. Final draft of sampling and mitigation plan based upon scope comments due to EPA RCRA enforcement for review and comment on September 24, 2007

3) Continue the partial treatment of stored process water from the emergency removal and begin flushing operation of storage areas.

4) Receive a copy of the pile stability engineering report and the freeboard maintence plan from Agrifos. Expected by September 21, 2007.

5) Complete emergency operations and transition site to EPA RCRA enforcement Project Manager, Agatha Benjamin.

Key Issues

On September 12, 2007, Agrofos initiated the emergency discharge of pond water. It is estimated that approximately 15-20 million of gallons was discharged between 1700, September 12, 2007 and 0700, September 13, 2007. This was done in anticipation of the arrival of Hurricane Humberto and Agrifos's gypsum expert indicating a 3 ½ foot freeboard requirement was required to prevent catastrophic stack failure.

On September 13, 2007, Agrofos adjusted discharge to meet upper limit of 5 million gallons allowed under the EPA CERCLA Order.

Environmental assessment has been initiated to determine environmental damage from release.

At 1400, September 15, 2007, Agrifos discontinued the discharge from Moat # 3 to the county ditch to Cotton Patch Bayou to Houston Ship Channel.

The facility will provide a complete accounting of pond water discharged.

TCEQ, USCG, and EPA continue to work well within Unified Command. NOAA has provided critical technical assistance during the response.

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.