U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
USOR-PRP - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #2**
Progress POLREP
USOR-PRP
A6X7
Pasadena, TX
Latitude: 29.7176340 Longitude: -95.2211820

To:
From: Adam Adams, OSC
Date: 11/25/2015
Reporting Period: Thru December 2015

1. Introduction

1.1 Background

Site Number:	A6X7	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	3/24/2011
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	
Mobilization Date:	10/1/2011	**Start Date:**	10/1/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	TXN000607093	**RCRIS ID:**	
ERNS No.:	946255, 946854, 959001	**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Removal Action / PRP Oversight.

1.1.2 Site Description

US Oil Recovery is located on approximately 13 acres of land just north of the City of Pasadena, Texas north of Texas Highway 225. US Oil Recovery (USOR) performed municipal and industrial wastewater pretreatment of Class I and Class II wastewater, characteristically hazardous waste, used oil and oily sludges, and municipal solid waste.

1.1.2.1 Location

US Oil Recovery is located at 400 N. Richey and 200 Richey, Pasadena, Harris County, Texas 77506 and includes both the USOR property and MCC property, respectively.

1.1.2.2 Description of Threat

EPA has responded on three occasions to stabilize the Site from uncontrolled releases of hazardous substances into Vince Bayou. Actions were initiated in July 2010, November 2010, and February 2011 under two separate Action Memorandums. EPA has removed 11,751 gallons of benzene contaminated hazardous sludge; 5 drums of benzene contaminated sludge washout; 89.36 tons of containment sludge; 10 cubic yards of PPE and IDW; and 833,500 gallons of contaminated storm water. EPA assessed, segregated, and contained 797 drums and 212 totes of flammables, acids, bases, combustibles, non-flammables, and unknowns. EPA secured, repaired, or replaced 225 roll-off container tarps, bows, or poles to prevent storm water contact with high level benzene contamination. The Texas Commission on Environmental Quality (TCEQ) and Harris County Pollution Control Services (HCPCS, formerly Harris County Public Health and Environmental Services, HCPHES) have been involved prior to and during the EPA lead actions.

Site includes containments, secondary containments, and sumps that have contamination and the potential to overflow and impact the nearby Vince bayou. Site also includes approximately 24 above ground storage tanks (ASTs), roll-off containers, totes, drums, and lab containers and samples in varying condition. Some contaminants and hazardous characteristics found at the Site include benzene, acetone, lead, flammables, and corrosives. There are other detected contaminants at the Site as well as unknowns.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Historical inspections/investigations conducted by the HCPCS and TCEQ have shown elevated levels of benzene and chlorinated solvents in some of the waste stored on-site.

Materials at the facility include solids, liquids, and sludges with hazardous characteristics that include flammables and corrosives. Assessment sampling conducted at the facility in July 2010 indicated acetone, benzene, toluene, ethyl benzene, and xylene in some of the facility containments. The north and south tank farm secondary containments and several sumps and bays at the facility have historically overflowed directly into the parking lot, which overflows directly into Vince Bayou.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Stabilization of the Site was transitioned to the PRP Group in the fall of 2011 after the Administrative Settlement Agreement and Order on Consent (AOC) was signed on August 25, 2011. PRP Group efforts are being conducted with EPA oversight and include monitoring, securing, and stabilizing the Site. Additionally, hazardous substances and contaminants are removed by the PRP Group as part of the stabilization effort Site conditions warrant such a response.

2.1.2 Response Actions to Date

Since the PRP Group assumed full custody of the Site on August 25, 2011, all stabilization, security, and removal actions conducted at the Site have been performed by the PRP Group with EPA oversight. Actions being conducted or completed by the PRP Group include bi-weekly Site inspections, secondary containment pump-downs, and preventing uncontrolled releases.

2.1.2.1 Site Inspections.

The PRP Group conducts bi-weekly Site inspections to determine changing conditions which could pose a threat of release of hazardous substances to the environment and take the necessary actions to prevent such releases. This includes, but is not limited to inspecting:

a. Secondary containments for freeboard - Freeboard is recorded for all secondary containments.

b. Perimeter - Inspection of the entire perimeter is conducted to ensure no breaches have occurred and the Site is secure.

c. Drums and totes - No longer inspected. As reported by the PRP Group, all 861 drums and 246 totes were removed from October 30, 2014 to January 16, 2015.

d. Above ground storage tanks (AST's) - The physical condition of the ASTs are observed and any changes in physical condition (holes, leaks, etc.) are recorded and photo-documented.

e. Bio-reactor - Demolition of the bioreactor was completed on April 4, 2014.

f. Containments and sumps - Containments and sumps are inspected for any changes and freeboard measurements are recorded.

g. Process equipment - The physical conditions of the process equipment are observed and any changes in physical condition (holes, leaks, etc.) are recorded and photo-documented.

h. Retention pond - Available freeboard is recorded (measurements are taken when freeboard is less than 12-inches).

I. Roll-off containers - As all roll-off boxes were emptied, washed, and staged on the south of the site, they are not inspected bi-weekly, but rather occassionally.

j. Overall Site for spills and releases - When a spill or release is observed, it is recorded and photo-documented. If the site conditions are safe, attempts are made to locate the origin of the spill/release and secure it. All information is relayed the PRP group Project Manager and EPA OSC as soon as possible.

2.1.2.2 Secondary Containment Pump-downs.

The PRP Group conducts pump-downs from the secondary containments when freeboard decreases below established safe parameters. This is also done prior to significant weather events to prevent overtopping and uncontrolled spills/releases. As of December 2015, the PRP Group has removed and properly disposed or recycled approximately 1,412,880 gallons from secondary containments.

2.1.2.3 Perimeter/Site Security.

As a result of documented vandalism/theft observed during site inspections, the PRP Group installed wireless digital cameras around the Site. The digital cameras are linked to a security monitoring company that provides additional security measures.

2.1.2.4 Drums and totes.

The PRP Group subcontracted the detailed assessment of the drums/totes in preparation of future off-site removal. The PRP Group's subcontractor performed a detailed assessment including a detailed

sampling/HAZCAT field screening of the material contained within the drums/totes. Based on the HAZCAT field screening results the drums/totes were staged together based on preliminary waste codes. Composite samples were then collected from the waste codes for analytical testing to confirm the waste codes.

Based on the analytical testing/waste profiling, a removal of the drums and totes was conducted. As part of the removal action 1,107 containers (861 drums and 246 totes) were removed from the site for off-site disposal and/or recycling. Approximately 17,500 gallons of liquids were bulked and transported off-site via tanker trailers. An additional 8 roll-off boxes of material (empty drums, used PPE, floor sweepings, absorbent pads, etc.) were transported off-site for disposal.

2.1.2.5 AST's. The PRP Group sampled the liquids contained within the above ground storage tanks (ASTs). Upon receipt of the analytical data, the PRP Group will develop a work plan to address the contents within the tanks as well as as an off-site disposal plan.

2.1.2.6 Bio-reactor. Demolition activities were completed in early 2014.

2.1.2.7 Containments and sumps. Containments and sumps are inspected and available freeboard measurements are recorded as part of the bi-weekly Site Inspections. When freeboard levels are critical or ahead of major weather events pumps occur to minimize the risk for spills/releases.

2.1.2.8 Process equipment. The PRP Group conducted and photo-documented an initial assessment/inspection of the process equipment located throughout the site. A detailed work plan to address the process equipment will be completed.

2.1.2.9 Retention Pond. The retention pond is inspected as part of the bi-weekly Site Inspections with conditions recorded.

2.1.2.10 Roll-off containers. The contents of the roll-off boxes have been emptied, pressure washed to remove residual material and staged on the south end of the site. The PRP Group submitted a request to leave the roll-off boxes open to prevent rain water accumulation in the boxes. The request was granted, thus allowing accumulated rain water to drain to the ground surface.

2.1.2.11 Overall Site. The PRP Group continued bi-weekly site security monitoring activities. Monitoring activities included measuring available secondary containment free board and overall perimeter site security. The PRP Group took the necessary actions when site conditions warranted activities (i.e. secondary containment pump downs to allow adequate free board, watching for overflow during heavy rain events, using sorbent pads and booms when necessary).

The PRP Group plugged the connections between MCC lift station 1 and the sand filter. The plugs failed and had to be replugged. Additionally, the MCC Lift Station 1 was plugged using pneumatic plugs set to 25 psi. The retention pond was discharged and samples were collected from the aerobic digester for profiling in anticipation of possible future pump down events. Cracks at MCC East Sand Filter and Chlorine Contact Tank were sealed to prevent further cracking or leaks. Equipment onsite, including hoppers used for oil filter storage, were addressed for residual waste removal. Two vacuum boxes and two roll-off boxes were brought onsite to collect the liquid and solid wastes for disposal. The hoppers were pressure washed and the wash water was collected for disposal to an EPA-approved facility. Heavy rains impacted the area causing overflowing from the Lift Station 1. A frac tank was brought onsite at MCC East to collect material from the aerobic digester. Samples were being taken from the retention pond and a third discharge is being scheduled.

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will continue to conduct oversight and monitoring of PRP Group stabilization activities.

2.3 Logistics Section

No Information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No additional information available at this time.

3. Participating Entities

3.1 Unified Command

The PRP Group is conducting stabilization actions with EPA oversight.

3.2 Cooperating Agencies

Texas Commission on Environmental Quality (TCEQ)
Harris County Pollution Control Services (HCPCS)

4. Personnel On Site

Personnel on-site as needed include PRP Group Contractors, EPA, EPA START-3 contractors, TCEQ, and HCPCS.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/USOR-PRP

This website includes actions conducted at the site from fall 2011 to present and are being conducted by the PRP Group with EPA oversight.

www.epaosc.org/USOilRecovery-Pasadena

This website includes actions conducted at the site from July 2010 to 2012 by EPA.

7. Situational Reference Materials

No available information at this time.