

**PETRO-CHEMICAL
SYSTEMS, INC.
(TURTLE BAYOU)
TEXAS**

EPA ID# TXD980873350
Site ID: 0602957



**EPA REGION 6
CONGRESSIONAL DISTRICT 02
Liberty County**

**Other Names:
Turtle Bayou
Raji Josiam, (214) 665-8529**

Updated: April 2009

Site Description

- Location:**
- The site is located on County Road 126 or CR 126 (previously known as Frontier Park Road) or FPR), south of Liberty (east of Houston and FM 563; 7 miles north of I-10), Liberty County, Texas.
 - CR 126 traverses the site.
- Population:**
- There are residences and drinking water wells within a one-mile radius of the site along FM 563 and CR 126.
- Setting:**
- Of the 500+acre tract, 6 disposal areas have been identified.
 - Contaminated waste oils were used as dust control along CR 126.
 - In addition to CR 126, areas identified on the site include the CR 126 West Area, West Road Area, Main Waste Area, Office Trailer Area, Easement Area, and the Bayou Disposal Area. An additional area, the MW-109 area, is currently being evaluated for extent of contamination
- Hydrology:**
- The site is characterized by recent alluvial deposits, which overlay Texas Coastal Plain deposits.
 - The water table is at 18 to 25 feet below the surface of the site.
 - The east end of the site falls within the 100-year flood plain along the Turtle Bayou tributary.

Wastes and Volumes

- The principal pollutants at the site, by areas of concern, are:

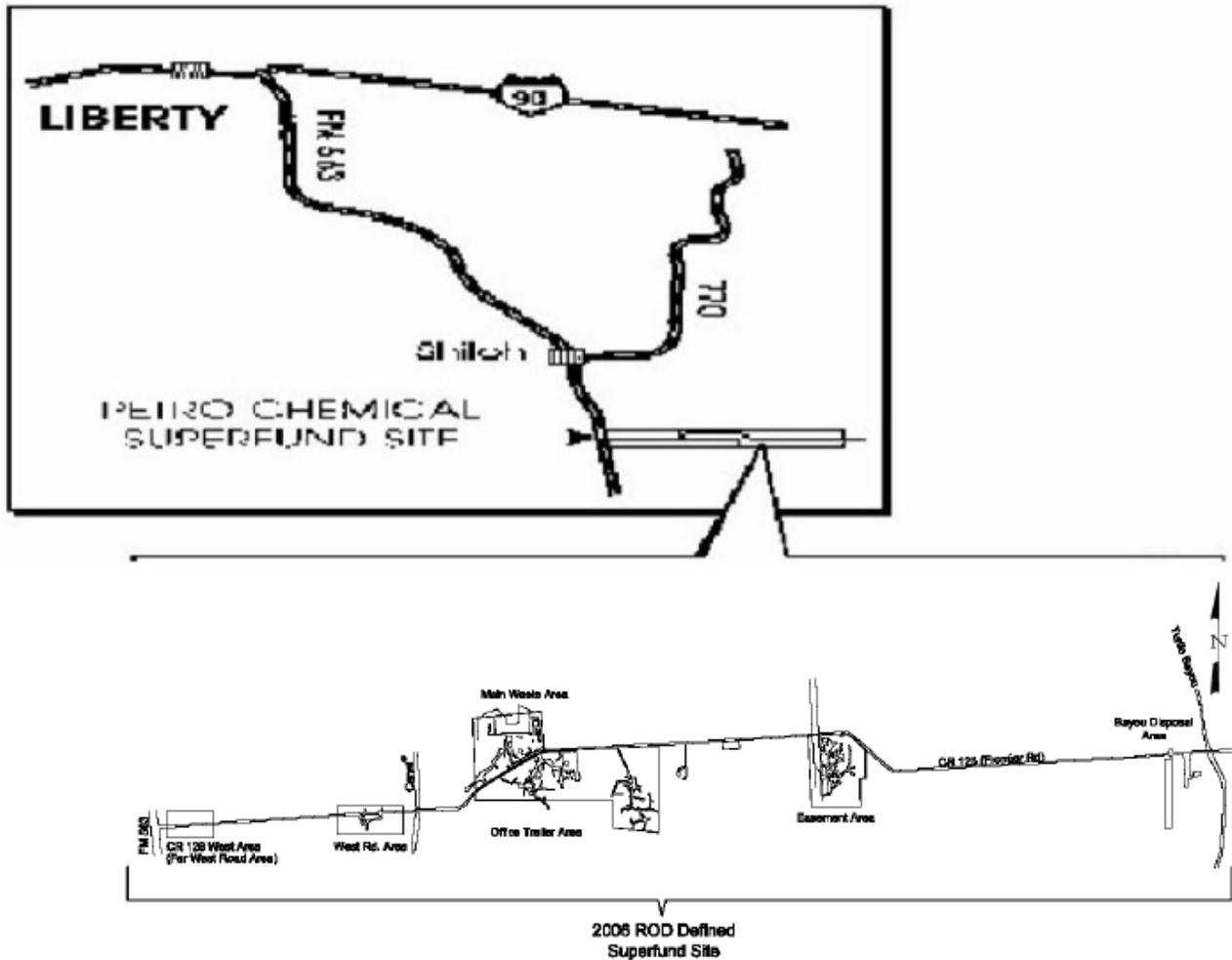
Road:	o Naphthalene	1100 ppm soil composite
	o Chrysene	8 ppm
	o Fluorene	200 ppm
	o Benzene	2000 ppm
Surface Soil:	o Benzene	Up to 7,000 ppm
	o Naphthalene	Up to 6,700 ppm
	o Lead	Up to 5,000 ppm
Groundwater:	o Naphthalene	13,000 ppm
	o Styrene	660 ppm
	o Benzene	480 ppm

- Waste volumes at the site include approximately 5,900 cubic yards in the road area and 300,000 cubic yards in the remainder of the site.

Site Assessment and Ranking

NPL LISTING HISTORY
Site HRS Score: 29.94
Proposed Date: 10/15/84
Final Date: 5/20/86
NPL Update: No. 2

Site Map and Diagram



The Remediation Process

Site History:

- Site operations commenced prior to 1970 and continued until the late 1970s. Waste oils were dumped on CR 126 and into unlined waste pits along road.
- A conditional commercial permit was issued 1971 but was revoked due to legal action and withdrawn 1974.
- After 1974, the land was developed and subdivided into residential properties.

- In 1986, EPA installed a fence and conducted site sampling.
- In 1988, CR 126 was excavated, back-filled, and re-built; residents were relocated during this period.
- The Remedial Investigations and Feasibility Studies (RI/FS) for both FPR and Source Control phases (operable units) were initiated in April 1988.
- The Texas Department on Environmental Quality (TCEQ) is the lead agency on cleanup of the FPR phase, while EPA has the lead on the Source Control.

Health Considerations:

- Ground water contamination has been detected.
- The Agency for Toxic Substances and Disease Registry (ATSDR) has indicated that no immediate health threat is posed.
- All areas of apparent waste disposal have been identified.

Other Environmental Risks:

- Numerous shallow wells, approximately 25 ft. deep, are a current source of drinking water for the rural area.
- However, all wells currently used on the site are screened in the deeper aquifer at depths of approximately 180 feet or more.

Record of Decision

<p>Signed: March 27, 1987 (FPR) Signed: September 6, 1991 (Source) ROD Amendment: April 30, 1998 (Source & Ground Water) ROD Amendment: September 22, 2006 (Source & Ground Water)</p>
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FPR (CR 126):

- The Record of Decision (ROD) for FPR called for excavation of soil on and around the road followed by placement of the contaminated soil within a temporary on-site RCRA storage facility with temporary relocation of residents.
- This remedy includes mowing of the vault and road area, visual inspections, and disposal of leachate.

Source Control:

- The Source Control ROD selected soil vapor extraction and catalytic oxidation of organic contamination and includes cap and slurry walls around waste disposal areas. To address ground water contamination, soil sparging with extraction and treatment of contaminated vapors was identified. As a result of extensive field pilot study activities conducted during the remedial design, additional soil and ground water remedy enhancements have been identified. These include in-situ bioremediation of contaminated ground water. To more effectively address soil contamination, the following remedial enhancements were identified: thermal desorption, bioventing, excavation and

treatment and/or offsite disposal of site 'hot spots', etc. In 1998, the EPA amended the 1991 ROD to include these and other remedial approaches.

<u>Other Remedies Considered</u>	<u>Reason Not Chosen</u>
-----FPR-----	
1. "No Action"	Road needs action, too great a threat
2. Onsite storage with temporary detours	More costly than relocation
3. Off-site disposal with relocation of residents	Not cost-effective; transportation risks
4. Off-site disposal with temporary detours	Not cost-effective; transportation risks
5. Alternative access, Fence contaminated areas	Does not eliminate threat from road
6. Removal to background levels, temporary detours	Not cost-effective
7. Surface barrier, temporary detours	Does not alleviate threat from road
-----Source Control-----	
1. "No Action"	Not protective of human health and the environment
2. Cap and Slurry Wall	Part of selected remedy
3. Biological treatment	Short Term Impacts
4. Solvent extraction	Short Term Impacts
5. Thermal destruction	Not cost-effective
6. Thermal stripping	Short Term Impacts
7. On-site landfill disposal	Short Term Impacts
8. Offsite landfill disposal	Short Term Impacts
9. Soil vapor extraction and catalytic oxidation	Part of selected remedy
10. Ground water extraction (wells), carbon adsorption or direct disposal	May be used, based on pilot study results
11. Ground water extraction by recovery trenches; carbon adsorption or direct disposal.	May be used, based on pilot study results
12. Combination of treatment technologies to address various areas of site.	May be used, based on pilot study results

- An Inter-agency agreement was signed with Federal Emergency Management Agency to relocate residents during work on FPR.

ROD Amendment:

The 1998 ROD Amendment addressed a modification to the soil cleanup criteria for benzene identified in the September 6, 1991 ROD. The 1991 ROD=s benzene soil cleanup criteria was based on numerical model predictions of the allowable benzene concentrations in soils that, when attained, would not result in exceeding the federal drinking water standards in the underlying shallow aquifer via leaching. The benzene soil cleanup criteria modification is based on the following:

- X rerunning the numerical model using site specific data (e.g., soil moisture profiles, field permeability test results) collected during the field pilot study activities; and
- X consideration of the Texas Natural Resource Conservation Commission=s residential exposure

standard for benzene in soil from zero to two feet below ground surface.

All other 1991 ROD performance standards, including the benzene ground water cleanup criteria, remained unchanged.

The 1998 ROD Amendment addressed the remedy for the site's contaminated soils and contaminated ground water. The remedy for the soil contamination addresses the principal threats (i.e., areas of the site where soil is known or suspected to contain high concentrations of dissolved and/or free non-aqueous phase liquid) as well as low level threats at the site by minimizing potential exposure by way of ingestion, inhalation or direct contact with contaminants and by reducing the potential for the contaminated soil to act as a continued source for ground water contamination. The remedy for the ground water contamination addresses the principal risk at the site by minimizing potential exposure by way of direct contact and ingestion with contaminants and by eliminating the potential for migration of contaminants to deeper ground water zones.

The 1998 ROD Amendment enhanced the site=s remedy by identifying additional soil and ground water remedy components, which can be used in combination with 1991 ROD, remedy components to achieve the site=s performance standards in compliance with all Federal, state and local applicable or appropriate requirements. The identification of the additional remedy components used to achieve the site performance standards is based upon further site characterization, results of field pilot studies, and the ongoing operation of the pilot systems. The additional soil and ground water remedy components include:

- X in-situ aquifer bioremediation;
- X bioventing;
- X aqueous phase soil bioremediation;
- X soil excavation and off-site treatment and/or disposal;
- X soil excavation and biotreatment;
- X thermal desorption;
- X soil washing;
- X containment (e.g., living cap);
- X monitored natural attenuation; and
- X institutional controls.

Remedy components identified in the 1991 ROD include:

- X soil vapor extraction;
- X containment (e.g., traditional synthetic liner cap);
- X selected directional containment (e.g., slurry wall);
- X installation of storm water management controls;
- X monitoring ground water; and
- X the restoration of the site surface upon completion of the remedial action.

The primary remedy treatment components addressing site contamination are soil vapor extraction and in-situ aquifer bioremediation. The field pilot studies have shown that a flexible approach is an effective means of addressing the varying geologic conditions at the site and area specific problems. It is anticipated that to attain the performance standards, the use of the various remedy components in succession will be required. The use of multiple remedy components maximizes the efficiency of remedial operations: over time, treatment technologies such as soil vapor extraction become less effective in removing contamination, at which point it is more efficient to change to another, more passive, technology (e.g., bioventing). The transition from one remedy component (e.g., soil vapor extraction) to a subsequent remedy component (e.g., bioventing) will generally be determined by progress sampling. In general, benzene will be the main chemical of concern; the levels of benzene will be measured over time; a significant decrease in the time rate removal of benzene will indicate a remedy component change.

The ROD Amendment describes in more detail the use of various technologies in different areas of the site.

The 2006 ROD Amendment addresses the following modifications to the previous 1991 ROD and the 1998 ROD Amendment:

1. Documenting that a Technical Impracticability (TI) determination for restoration of portions of the shallow ground water at the site (the S1 sand and the deeper S2 sand) has been made for the site.
2. Expanding the scope of the remediation to include an additional contaminant source area designated as the County Road (CR) 126 West Area (a.k.a. Far West Road Area).
3. Identifying the remedy for the CR 126 West Area.
4. Identifying factors which support granting a TI waiver for the Main Waste Area, the West Road Area, the Office Trailer Area, the Easement Area, and the CR 126 West Area.
5. Presenting MW-109 Area information, although no remedial decisions for this area are being made at this time because further investigations should be conducted.
6. Amending the site's ground water cleanup levels.
7. Amending the site's soil cleanup criteria.
8. Amending the remedy for the Bayou Disposal Area.
9. Amending the remedy for the Main Waste Area's on-site soils vault.
10. Designating that the exact boundaries of the TI Zones will be established after a two-year transitional monitoring period. The two-year monitoring period will also be used to determine whether the selected remedy is effective to prevent contaminants with concentrations exceeding the groundwater protection standards from migrating beyond the S1 and S2 TI zone boundaries
11. Identifying contingency remedies for the site in the event that future groundwater monitoring demonstrates that the plumes of contaminated ground water are expanding in either the S1 or S2 sand. These contingency remedies could be implemented, if necessary, at any of the impacted areas throughout the site.

Community Involvement

- Community Involvement Plan: Developed 8/85, revised 11/89
- Open houses and workshops: 12/84, 11/85, 3/89, 4/91, 6/91, 2/96, 7/00, 11/00
- Proposed Plan Fact Sheet and Public Meeting: 11/86 (FPR), 6/91 (Source)
- ROD Fact Sheet: 3/87 (FPR), 9/91 (Source), 5/06 (Source and Groundwater)
- Milestone Fact Sheets: 10/86, 7/87, 12/87, 7/88, 1/89, 11/90 (TWC), 05/91, 08/95, 09/99
- Proposed ROD Amendment fact sheet (10/97) and public meeting (11/97), 4/06, 9/07
- Constituency Interest: Site-area residents are concerned about site contamination, property values, and maintenance of CR 126.
- Site Repository: Liberty Municipal Library, 1710 Sam Houston Avenue, Liberty, TX 77575

Technical Assistance Grant

- Letters of Intent Received: None
- Grant Award: N/A
- Current Status: No apparent citizen interest in applying for the grant.

Contacts

- **Remedial Project Manager:** Raji Josiam, (214) 665-8529, Mail Code: 6SF-RA
- **EPA Regional Public Liaison:** Donn R. Walters (214) 665-6483
- **State Contact:** (TCEQ) Luda Voskov, (512) 239-6368
- **Attorney:** Anne Foster, (214) 665-2169
- **State Coordinator (EPA):** Kathy Gibson, (214) 665-7196, Mail Code: 6SF-VC
- **Prime Contractors:** EA Engineering, Science, and Technology Inc.
EPA Toll Free Telephone No. 1-800-533-3508

Information Repository

Liberty Municipal Library

1710 Sam Houston Ave.
Liberty, Texas 77575
(936) 336-8901
M-TH: 10:00 am – 6:00 pm;
Fr: 1:00 pm – 5:00 pm
Sa: 10:00 am – 4:00 pm

Texas Commission on Environmental Quality

Records Management Center
Building D, Room 190
12100 Park 35 Circle
Austin, Texas 78753
Phone number 1-800-633-9363 or 512-239-2920
M – Fr: 8:00 am – 5:00 pm

Enforcement

- During the course of the original RI/FS, a supplemental RI/FS was conducted by ARCO under an Administrative Order on Consent signed 3/6/91.
- In May 1993, Special Notice Letters were sent to eight parties to conduct the RI/FS.
- After a failed attempt to negotiate a Consent Decree with site PRPs, a Unilateral Administrative Order (UAO) was issued to Potentially Responsible Parties (PRPs) in December 1993. ARCO Chemical Company and Atlantic Richfield Company are the only PRPs currently implementing work required by UAO.
- A Consent Decree between EPA, Lyondell (formerly ARCO Chemical), and Atlantic Richfield has been entered with the Eastern District Court of Texas by the Department of Justice. The Consent Decree was lodged by the court on December 8, 1998.
- A Consent Decree between EPA and EPEC Polymer Inc. was lodged in the Eastern District Court of Texas court on March 20, 2007 by the Department of Justice. The Consent Decree was entered by the court on August 21, 2007.

Present Status and Issues

- With the cleanup actions described above, the EPA has greatly reduced the potential for accidental contact or exposure to contaminated soil and dust along CR 126 while cleanup actions are being designed.
- What is the status of remedial action at Petro-Chemical Systems, Inc. site?
 - The areas where remedial actions have taken place or are required are as follows: County Road (CR) 126 (previously FPR), the CR 126 West Area, the West Road Area, the Main Waste Area, the Office Trailer Area, the Easement Area, the Bayou Disposal Area, and the MW-109 area.

- The remedy for CR 126 was completed in 1988. The remedy included excavation of the road's most contaminated soils, placement of these soils in an on-site vault, and paving the road to prevent direct contact with less contaminated soils. The CR 126 remedial action cost was approximately \$2 million.
- The remedy for the site's West Road Area, Main Waste Area, Office Trailer Area, and Easement Area has been implemented by Lyondell Chemical Company and Atlantic Richfield pursuant to a Consent Decree. The remedy included the application of various soil and ground water remedial technologies (e.g., soil vapor extraction, in-situ bioremediation). Based on 7+ years of active remediation, attainment of the site's cleanup goals has been determined to be technically impracticable. These affected areas have been purchased by Lyondell to preclude access and residential exposure. Long-term ground water monitoring is taking place to ensure contaminant migration outside these areas does not occur. Approximately \$30 million was spent for remedial activities in these areas.
- The current remedy for the Bayou Disposal Area includes no removal of the affected soil provided institutional controls and change of land use to non-residential are implemented.
- The remedy for the CR 126 West Area is ongoing and includes mechanical auger mixing and in-situ chemical oxidation of contaminated soils and groundwater for an estimated cost of \$8 to \$12 million dollars. EPEC Polymers Inc. is performing these activities pursuant to a Consent Decree that was entered on August 21, 2007. Remedial Action construction work in the CR 126 West area was completed in September 2008 and confirmatory samples were taken in October 2008. Confirmatory sampling results confirm that the cleanup goals have been met. Quarterly groundwater monitoring is being implemented.
- The MW-109 area has been characterized for the extent of contamination. The extent of contamination in this newly identified area is localized since previous ground water sampling has shown elevated benzene concentrations in MW-109 but not in the surrounding wells. A remedy for the cleanup of the MW-109 is to be selected.

Benefits

- Local residents and businesses in the site area are now safe from direct contact and dust inhalation of CR 126 wastes.
- Remedial activities are cleaning the site to be fully protective for those living on the site now or in the future.