



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

March 8, 2018

Mr. Herman Rodriguez
City Secretary
City of Robstown
101 E. Main Street
Robstown, Texas 78380

Re: Ready for Reuse Determination
Former Rogers Delinted Cottonseed
US Highway 77
Robstown, Texas 78380
EPA ID Number: TXD980873160
TCEQ RN and CN Numbers: RN102155272, CN601446339

Dear Mr. Rodriguez:

The United States Environmental Protection Agency (EPA) Region 6 has determined that the Former Rogers Delinted Cottonseed Company site (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgement that environmental conditions on the Property are protective of human health and the environment based on its current and future commercial/industrial land use.

The Property is approximately 15 acres and located in Nueces County, Robstown, Texas. The Property, from 1962 to 1984, was a cottonseed delinting facility utilizing concentrated sulfuric acid to dissolve cotton fibers, and rinsed cottonseeds were treated with fungicide and/or pesticide before packaging. Used acid and rinsate were discharged to a series of four on-site evaporation ponds. The Property was purchased by Yazaki USA in 1984, but operations were never restarted. The City of Robstown acquired the property in March 2012, by paying back taxes after the passing of Yazaki's owner in 1997.

In an effort to determine risks from this site, EPA Region 6 began in 2005 utilizing Resource Conservation Recovery Act, Enforcement, Permitting and Assistance (RCRA REPA) contract funds to perform environmental investigations at the Property. From 2010 to 2016, EPA Region 6 performed four soil and groundwater sampling events, as well as, other activities to limit exposures. In cooperation with the City of Robstown in 2013, EPA Region 6 Superfund Technical Assessment and Response Team (START) was deployed to conduct a removal action

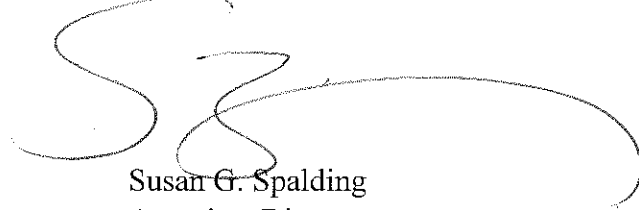
in the abandoned buildings which have since been demolished and removed by the City of Robstown.

With this Ready for Reuse Determination, EPA Region 6, in consultation with the Texas Department of Environmental Quality (TCEQ), agrees that the City of Robstown Property has successfully been investigated, remediation and risk management activities implemented, and that environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future commercial/industrial uses. The Ready for Reuse Basis of Decision (BOD) is provided as Enclosure 1 to this correspondence. Survey and legal description for the property is provided in Enclosure 2.

If conditions on the Property change (e.g. land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify TCEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserves all rights and authorities to require further action by owners or operators if new or additional information is discovered that impacts this Ready for Reuse Determination, whether such information is known as of this date or becomes available in the future.

We wish you success in future endeavor and development at the site!

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'S. Spalding', is written over the typed name.

Susan G. Spalding
Associate Director
Hazardous Waste Branch
Multimedia Division

Enclosures

cc: Jim Formby, TCEQ

ENCLOSURE 1

READY FOR REUSE
BASIS OF DECISION

Enclosure 1
Ready for Reuse Basis of Decision
Former Rogers Delinted Cottonseed Company Facility
(EPA ID: TXD980873160)
Nueces County, Robstown, Texas

Introduction

The United States Environmental Protection Agency (EPA) Region 6 (R6) has determined that the former Rogers Delinted Cottonseed Company (RDCC) located at US Highway 77, Robstown, Texas (the “Property”) is Ready for Reuse. The Property meets the criteria for the Ready for Reuse Determination since the current condition of the Property is protective of human health and the environment, based on its present and anticipated future use as a commercial/industrial property. A description of the Property, site background information, and a summary of remedial activities and current conditions are provided in the following sections.

Property Description

The Ready for Reuse Determination is being issued for the Property, as shown on the Nueces County Appraisal District Map provided in Enclosure 2. The former RDCC site is located northeast of Robstown, Texas, in Nueces County, about fourteen miles northwest of Corpus Christi. The area topography is relatively flat with groundwater flow southeastward, toward Nueces Bay which is the northwestern extension of Corpus Christi Bay. Figure 1 presents a general site location map. The property is bounded on the west by an active railroad and Business Highway 77, on the north by crop fields, and on the south and east by a Texas Commission on Environmental Quality (TCEQ) approved closed landfill owned by the City of Robstown and the wastewater treatment plant. Figure 2 presents RDCC site location map.

Site Background

Between the years of approximately 1962 and 1984, RDCC operated a wet acid cottonseed delinting process at its facility (the “Property”) in Robstown, Texas. The delinting process utilized concentrated sulfuric acid to dissolve cotton fibers from the seed. Seed was rinsed prior to fungicide treatment and packing, and some seeds were also treated with insecticide. Concentrated sulfuric acid was stored in an aboveground storage tank at the facility. Spent acid, rinse water, and regulated wastewater were discharged from the process sump through an underground pipe to a series of four onsite unlined earthen evaporation ponds. Sludges from these evaporation ponds were occasionally redistributed and spread around the site. One of the evaporation ponds (Pond 1) was closed in October 1982 under a Texas Department of Water Resources (TDWR) closure plan. During the closure process, the pond contents were neutralized to a pH level greater than 2, and a 3-foot thick clay cap was applied over the neutralized pond contents.

RDCC was purchased by Yazaki USA in February 1984. The acquisition of RDCC was for its development of a gossypol-free cottonseed which could be used for food; however, Yazaki never operated at the Property. Neutralization of pond contents at the remaining ponds (Ponds 2, 3, and 4) shown in Figure 3 was never completed. In 1985, EPA issued a Consent Agreement and Final Order requiring closure of the three ponds under an approved closure plan. Yazaki installed a groundwater monitoring system at the Property in 1986, but the evaporation ponds were not closed according to the approved closure plan. The owner of RDCC, Mr. Yazaki, passed away in 1997, and subsequently, the property fell into foreclosure. The Property had never been sold or transferred due to the potential environmental liability. RDCC was not eligible for the EPA Small Business Liability Relief and Brownfields Revitalization Act Brownfields Cleanup Grant because of its requirement of application from the property owner.

In March 2012, Robstown Improvement Development Corporation (RIDC) of the City of Robstown acquired the Property as a tax resale.

Summary of Site Assessment and Remedial Actions

On May 1, 1976, RDCC was registered with the TCEQ in their Industrial and Hazardous Waste Notice of Registration (NOR) as a solid waste management unit (SWMU 0001) (which was a surface impoundment), and RDCC was evaluated for potential TCEQ Superfund action in 2003. In August 2004, EPA R6 Resource Conservation Recovery Act (RCRA) Program staff performed a site visit to gather information for a RCRA corrective action determination, and to evaluate potential exposures and human risks for trespassers since the former RDCC facility process building, warehouse, and surrounding area had been frequented by trespassers playing paintball.

The former RDCC was ranked as high priority in the 2005 RCRA Corrective Action Baseline of Facilities under the Government Performance and Results Act (GPRA). Since the former RDCC has been placed on the GPRA list, the EPA R6 RCRA Program has performed several interim measures and investigations at the Property in order to achieve the GPRA environmental indicators, CA725 (Current Human Exposures Under Control) and CA750 (Migration of Groundwater Contamination Under Control).

In March 2005, EPA R6 RCRA staff conducted sampling activities to evaluate potential contamination for metals, organophosphates, and pesticides in surface soils. In July 2005, EPA utilized contracting funds to implement interim corrective measures at the site. Interim measures included floor sweeping, collecting non-hazardous waste material in the warehouse and disposing of chemical containers offsite, and installing signage and fences at the Property.

By 2010, all fencing was demolished and only several vandalized signs remained. The sulfuric acid above ground storage tank (AST) collapsed and the contents leaked out onto the concrete pad and surrounding soil of the abandoned process building at the Property. EPA RCRA staff collaborated with the City of Robstown to dispose of the abandoned tires and discarded pallets to demolish the paintball courses at the site. EPA RCRA

program utilized contracting funds to install four groundwater monitoring wells, sample groundwater and surface soil, and install soil borings in the previous evaporation pond (Ponds 2, 3, and 4) locations shown in Figure 3. Analytical results from the June 2010 sampling event indicated elevated pesticides concentrations (alpha-BHC, gamma-BHC, and thiram) in one groundwater monitoring well and elevated metal concentration (arsenic) in a majority of the wells. Composite and soil boring results showed all soil pH levels were above 2.

In June 2011, another round of groundwater sampling and a field reconnaissance survey of private water wells located within a 500-foot radius of the Property were performed. Elevated arsenic concentrations were detected in most of the groundwater monitoring wells, and no elevated pesticides or volatile organic compounds (VOCs) were detected.

An EPA Superfund Technical Assessment and Response (START) contractor mobilized in August 2011 to perform the removal action at the Property. Removal activities included cleaning and demolishing the collapsed sulfuric acid AST, removing impacted soils, neutralizing soil surrounding the process building, and removing all pesticide and fungicide dust and debris throughout the process building and disposal offsite.

In July 2013, surface and subsurface soils and groundwater sampling was conducted at the Property utilizing EPA RCRA contracting funds. No elevated concentrations of metals or pesticides were detected in surface or subsurface soils and all soils were above pH of 2. Elevated arsenic concentration was detected in most of the groundwater monitoring wells, and no elevated pesticides or VOCs were detected.

In August 2016, EPA RCRA contracting funds were utilized in performing groundwater and soil gas sampling at the Property. VOCs soil gas were detected at one location adjacent to the closed landfill west of the Property. No metals, VOCs, or pesticides were detected in groundwater except an elevated Thiram (pesticide/fungicide) concentration in one monitoring well.

In August 2017, EPA and its contractor mobilized to the Property to perform plugging and abandonment of groundwater monitoring wells. Locations are shown in Figure 4. During this event, three wells (MW-4, MW-7, and MW-9) were pulled and the boreholes were grouted, and MW-6 well was converted to a surface mounted completion for future periodic monitoring and sampling. Visual survey and water dowsing method were employed in an attempt to locate the previously located unknown wells (MW-A, MW-B, MW-C) and other damaged (MW-3) and destroyed (MW-8) wells. Only MW-B was located; however, it was a property marker.

Summary of Current Conditions

Upon completion of four consecutive sampling events in 2011, 2012, 2013, and 2016 to evaluate the extent of the soil and groundwater contamination, EPA determined that the former RDCC has achieved the GPR environmental indicators, CA725 (Current

Human Exposures Under Control) and CA750 (Migration of Groundwater Contamination Under Control).

Surface impoundments (previous evaporation ponds 2, 3, and 4) have shown no release and no migration into subsurface soils, and pH level of greater than 2 has been achieved thru natural process and degradation without modification to the solid waste management unit (SWMU 0001).

Historical arsenic concentration in the site groundwater is attributed to the naturally occurring background concentration in the geographic region (Gates et al., 2011; McMahon et al., 2016). Concentrations of historical use of site-specific pesticides have shown steady and decreasing trend, and periodic groundwater sampling may be beneficial to monitor groundwater natural attenuation.

The City of Robstown has started the filing process of groundwater use deed restriction on the Property with the Nueces County in September 2017.

Intended Future Use

The intended future use of the Property is for commercial/industrial purposes.

References

Former Rogers Delinted Cottonseed Company Sampling and Analysis Support, Robstown, Texas, EPA ID No. TXD980873160, Final Trip Report, Rev. 0. Toeroek Associates, Inc. December 14, 2016.

Rogers Delinted Cottonseed Company Sampling Report for Support for Sampling at Rogers Delinted Cottonseed Company Facility, Robstown, Texas. Booz Allen Hamilton. September 5, 2013.

Removal Report for Rogers Delinted Cottonseed Company, Robstown, Nueces County, Texas. Dynamac Corporation, January 5, 2012.

Removal Assessment Report for Rogers Delinted Cottonseed Company, Robstown, Nueces County, Texas. Dynamic Corporation, December 12, 2011.

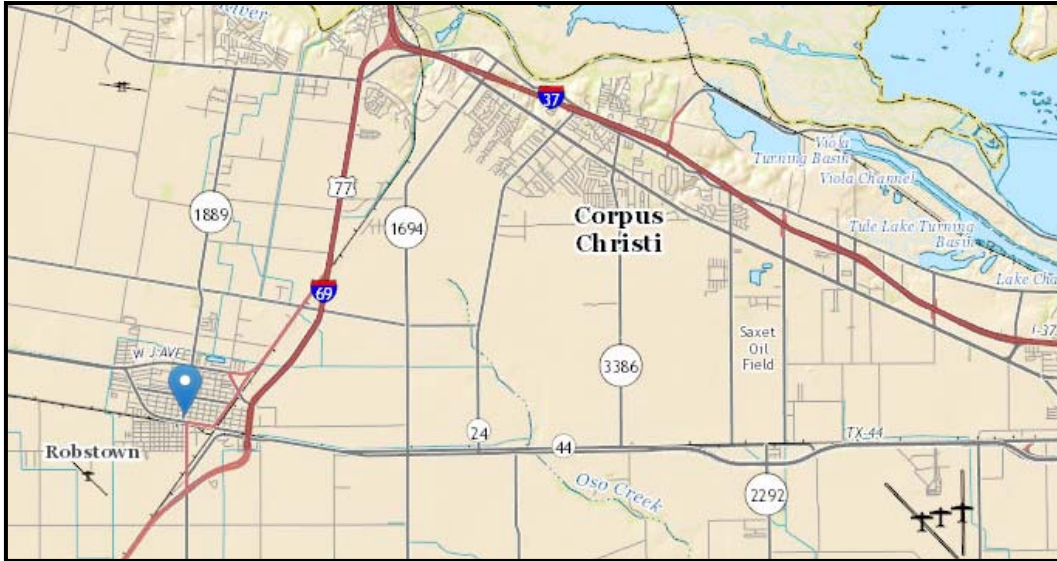
Sampling Report for Support for Sampling at the Rogers Delinted Site, Robstown, Texas. Booz Allen Hamilton. September 29, 2010.

Gates et al., 2011. Arsenic enrichment in unconfined sections of the southern Gulf Coast aquifer system Texas. Applied Geochemistry 26, 421-431.

McMahon et al., 2016. Chemical Considerations for an Updated National Assessment of Brackish Groundwater Resources. Groundwater Vol. 54, 464-475.

Attachments

Figure 1. General Site Location Map



Source: USGS US Topo Download (V1.0) March 2017

Figure 2. Former Rogers Delinted Cottonseed Company (RDCC) Site Location Map



Source: Former Rogers Delinted Cottonseed Company Sampling and Analysis Support, Robstown, Texas, EPA ID No. TXD980873160, Final Trip Report, Rev. 0. Toeroek Associates, Inc. December 14, 2016.

Figure 3. Previous Evaporation Ponds Location Map



Source: Rogers Delinted Cottonseed Company Sampling Report for Support For Sampling At Rogers Delinted Cottonseed Company Facility, Robstown, Texas. Booz Allen Hamilton. September 5, 2013.

Figure 4. Previous Groundwater Monitoring Wells Location Map



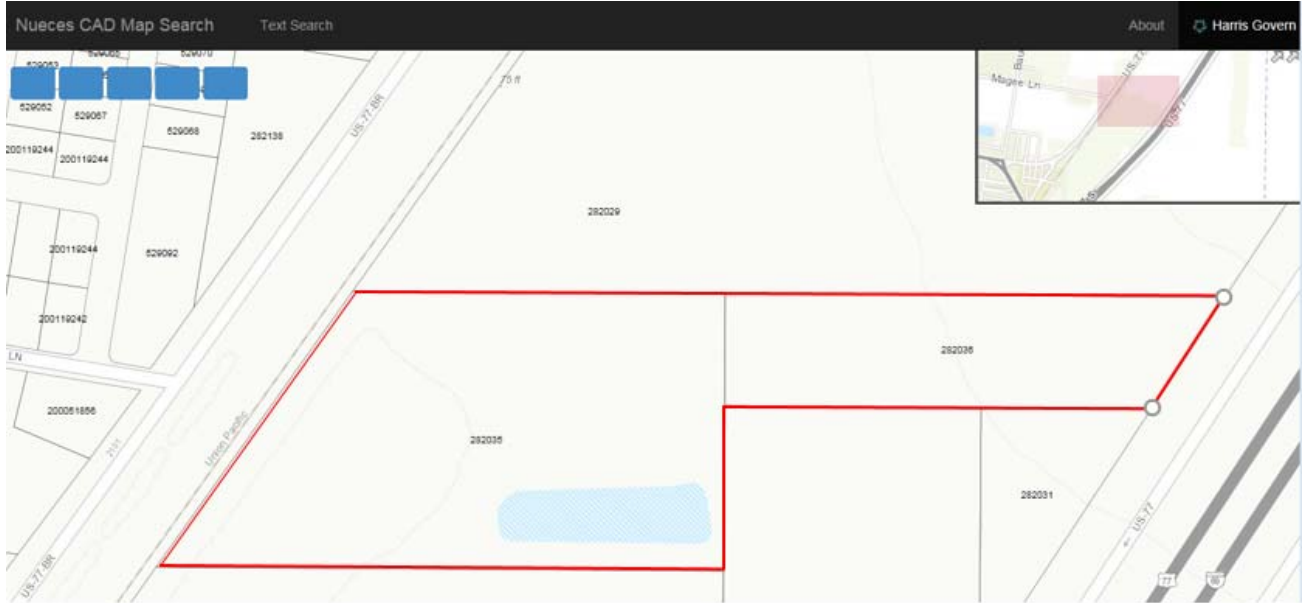
Source: Former Rogers Delinted Cottonseed Company Sampling and Analysis Support, Robstown, Texas, EPA ID No. TXD980873160, Final Trip Report, Rev. 0. Toerok Associates, Inc. December 14, 2016.

Note: Only MW6 is functional. All others were plugged or no longer exist.

ENCLOSURE 2

PARCEL LAYOUT
FORMER ROGERS DELINTED COTTONSEED COMPANY PROPERTY

Enclosure 2
 Nueces County Appraisal District Map
 Former Rogers Delinted Cottonseed Company Facility
 (EPA ID: TXD980873160)
 Nueces County, Robstown, Texas



Nueces CAD Property Search Map Search

Property Search Results > 282035 ROBSTOWN IMPROVEMENT DEV CORP for Year 2017 New Search

[Details](#) | [Map](#) Expand All

Click on a title bar to expand or collapse the information.

Property

Account		Legal Description: PAUL G H MAP D 3 ACS OUT OF W PT TR 3	
Property ID:	282035	Agent Code:	
Geographic ID:	6468-0003-0401		
Type:	Real		
Property Use Code:			
Property Use Description:			
Location		Mapsco:	
Address:	U.S. HWY 77 BUS (RBST) Robstown, TX 78380	Map ID:	R-177B
Neighborhood:	N/A		
Neighborhood CD:	O401		
Owner		Owner ID: 659988	
Name:	ROBSTOWN IMPROVEMENT DEV CORP	% Ownership:	100.000000000000%
Mailing Address:	P O BOX 872 ROBSTOWN, TX 78380	Exemptions:	EX-XV

Property

Account

Property ID:	282036	Legal Description:	PAUL G H MAP D 5 ACS OUT OF TR 3
Geographic ID:	6468-0003-0600	Agent Code:	
Type:	Real		
Property Use Code:			
Property Use Description:			

Location

Address:	U.S. HWY 77 BYPASS (RBST) ROBSTOWN, TX 78380	Mapsc0:	
Neighborhood:	N/A	Map ID:	R-177B
Neighborhood CD:	O401		

Owner

Name:	ROBSTOWN IMPROVEMENT DEV CORP	Owner ID:	659988
Mailing Address:	P O BOX 872 ROBSTOWN, TX 78380	% Ownership:	100.000000000000%
		Exemptions:	EX-XV