EPA

POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION: 6

SITE NUMBER (to be assigned by HQ): TX 11916

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

TXD990659682

A. SITE NAME: Rhone-Poulenc, Inc. (AKA Rhodia)

B. STREET (or other identifier): 6213 Highway 332 East

C. CITY: Freeport

D. STATE: TX

E. ZIP CODE: 77541

F. COUNTY NAME: Brazoria

G. OWNER/OPERATOR (if known)

1. NAME: Paul B. O'Hea, Plant Manager

2. TELEPHONE NUMBER: 409/233-7871

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION

See attachment A.

J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)

EPA Publication 600/2-80-197: "Dioxins"

K. DATE IDENTIFIED (mo., day, & yr.): 11/80

L. PRINCIPAL STATE CONTACT

1. NAME: Merlon Coloton, TDWR, Deer Park, TX

2. TELEPHONE NUMBER: 409/479-5981

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☐ 2. MEDIUM ☐ 3. LOW ☒ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION

☒ 1. NO ACTION NEEDED (no hazard)

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 4. SITE INSPECTION NEEDED (low priority)

SUPERFUND FILE
DEC 04 1992
REORGANIZED

C. PREPARER INFORMATION

1. NAME: David Anderson, FIT — David Anderson

2. TELEPHONE NUMBER: 214/742-6601

3. DATE (mo., day, & yr.): 8/8/83

III. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

☐ 2. INACTIVE (Those sites which no longer receive wastes.)

☐ 3. OTHER (specify): (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☐ 1. NO ☒ 2. YES (specify generator's four-digit SIC Code): 2869, 2827

C. AREA OF SITE (in acres): 50

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE (deg.-min.-sec.): 28°59'27" N

2. LONGITUDE (deg.-min.-sec.): 95°21'48" W

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES (specify): Plant buildings, warehouse and office

REVIEWED BY (GAEGH) DATE 8/18/83

T2070-2 (10-79)

Continue On Reverse

168274

Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relative to each activity by marking "X" in the appropriate boxes.

"X" A. TRANSPORTER	"X" B. STORER	"X" C. TREATER	"X" D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	X 3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	X 4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	XX 5. CHEMICAL/PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Wastes are stored temporarily onsite until picked up for off-site disposal. Rollins picks up and incinerates DCAC wastes. Radioactive materials are disposed of at approved sites. Caustic water streams are treated on_site. Catalysts (Vanadium) are recovered at an off-site facilty.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

- [ ] 1. UNKNOWN
- [X] 2. LIQUID
- [X] 3. SOLID
- [ ] 4. SLUDGE
- [ ] 5. GAS

B. WASTE CHARACTERISTICS

- [ ] 1. UNKNOWN
- [ ] 2. CORROSIVE
- [ ] 3. IGNITABLE
- [X] 4. RADIOACTIVE
- [ ] 5. HIGHLY VOLATILE
- [ ] 6. TOXIC
- [X] 7. REACTIVE
- [ ] 8. INERT
- [ ] 9. FLAMMABLE
- [X] 10. OTHER (specify): Caustic

C. WASTE CATEGORIES

1. Are records of waste available? Specify items such as manifests, inventories, etc. below.

Yes, manifests in company office

2. Estimate the amount (specify unit of measure) of waste by category: mark "X" to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: None	AMOUNT: None	AMOUNT: None	AMOUNT: 60,000	AMOUNT: None	AMOUNT: see below
UNIT OF MEASURE: -	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE: lbs/year	UNIT OF MEASURE:	UNIT OF MEASURE:
"X" (1) PAINT, PIGMENTS	"X" (1) OILY WASTES	"X" (1) HALOGENATED SOLVENTS	"X" (1) ACIDS	"X" (1) FLYASH	"X" (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGENTD SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	X (3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify): 4,400 drums/year solids 100-110,000 cubic ft./year liquids, dissolved solids.
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			X (11) OTHER (specify): DCAC waste		

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

The fire pond was dredged in 1981. After testing, material was used to fill in low areas of plant (photo 4-6). Wastewater treatment settling pond was also dredged in 1981, and disposed of in a local landfill after testing material. Calgon activated carbon wastewater (See attachment A)

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark "X")	C. ALLEGED INCIDENT (mark "X")	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD	X			
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continue On Reverse

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE:

TX 000 8737

[X] 1. NPDES PERMIT [ ] 2. SPCC PLAN [X] 3. STATE PERMIT (Specify) Solid Waste Reg. 30507

[X] 4. AIR PERMITS [ ] 5. LOCAL PERMIT [ ] 6. RCRA TRANSPORTER

[ ] 7. RCRA STORER [ ] 8. RCRA TREATER [ ] 9. RCRA DISPOSER

[X] 10. OTHER (Specify) RCRA Generator TXD 990659682 TDH Radioactive license 11-2807

B. IN COMPLIANCE?

[X] 1. YES [ ] 2. NO [ ] 3. UNKNOWN

4. WITH RESPECT TO (List regulation name & number)

VIII. PAST REGULATORY ACTIONS

[ ] A. NONE [X] B. YES (Summary in below)

January 1983-facility was not in compliance with NPDES . Nitrogen as ammonia discharge in compliance since February. Slighty basic in NPDES discharge on several occasions.

IX. INSPECTION ACTIVITY (Best of knowledge)

[ ] A. NONE [X] B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (Mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Inspection	6/83	S tate TDWR	Annual Inspection
Inspection	8/82	State TDH	Annual Inspection
Inspection	6/83	State TACB	Annual Inspection

X. REMEDIAL ACTIVITY (Best of knowledge)

[X] A. NONE [ ] B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (Mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

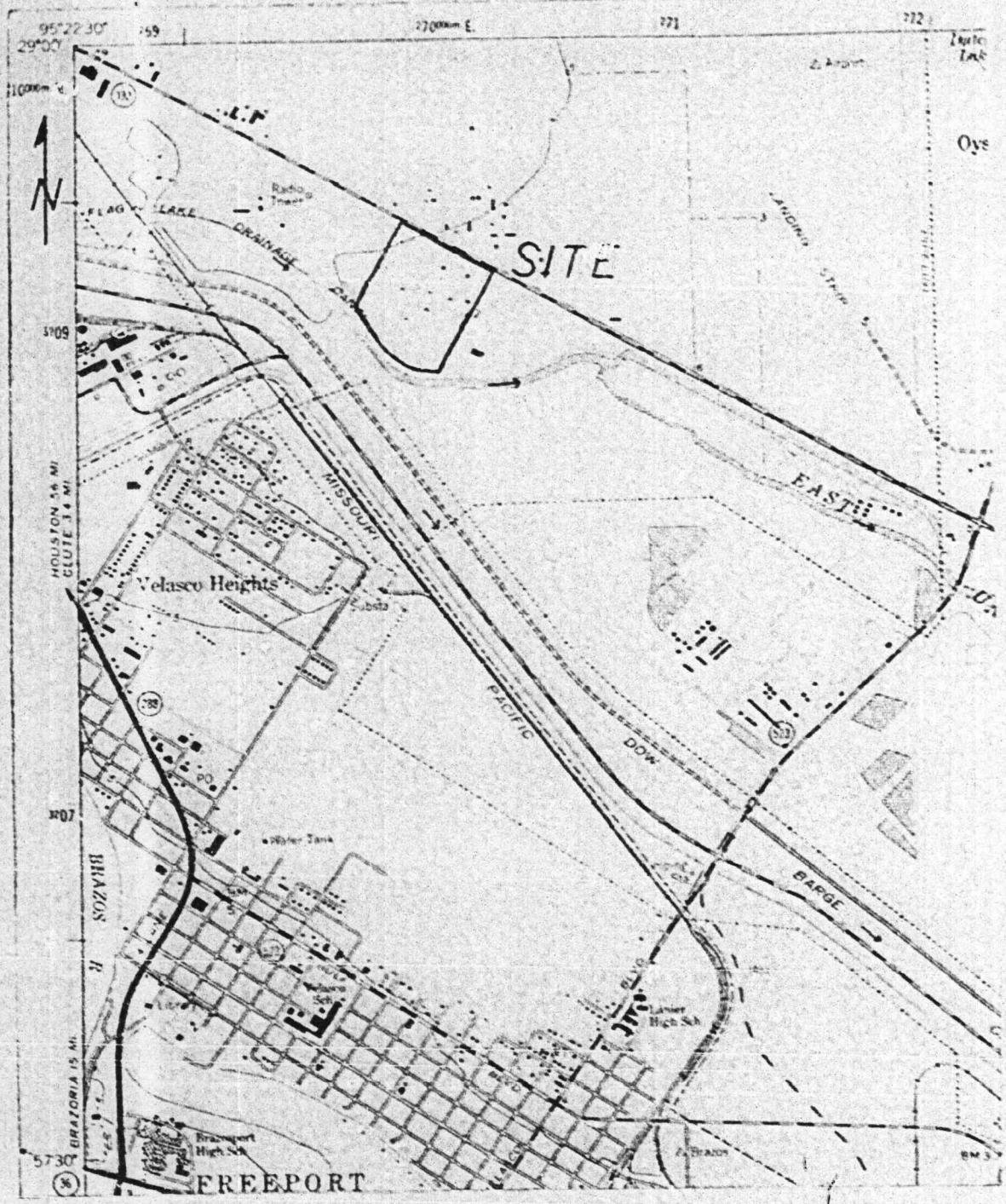
NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

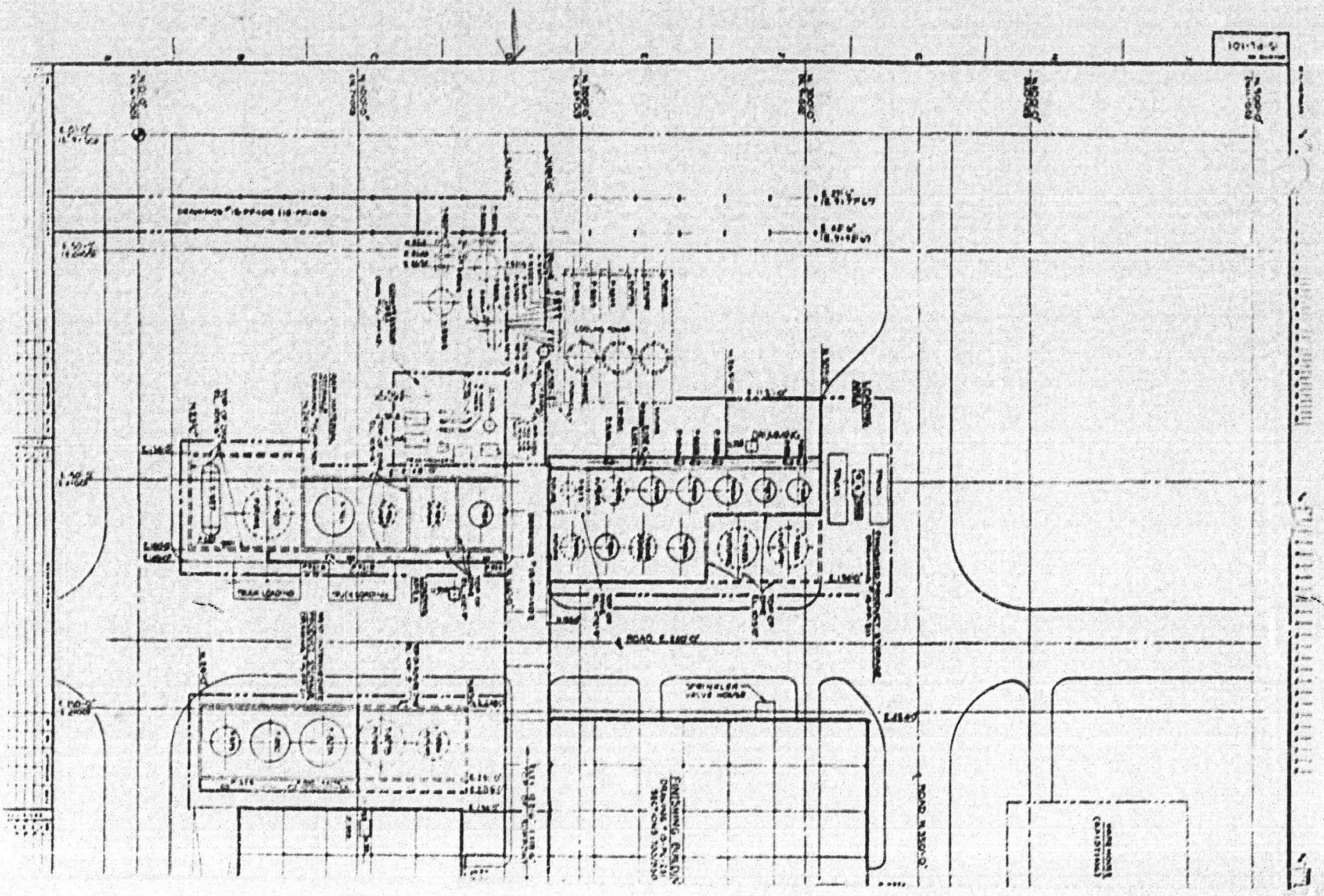
Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

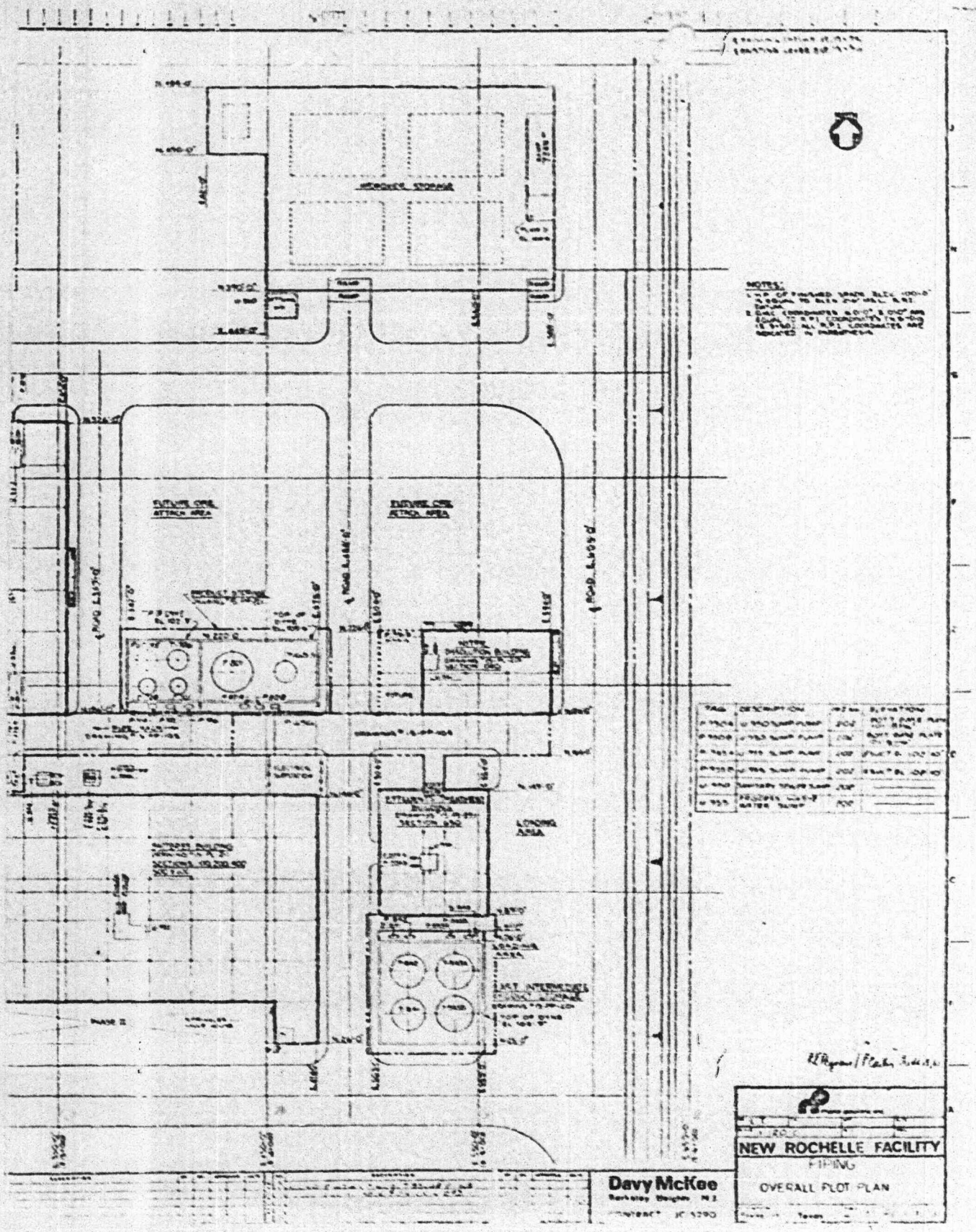
Corresponding number on form	Additional Remark and/or Explanation
I.1.	The site is an active chemical manufacturing facility. No waste is disposed on on-site. Waste is temporarily stored on site in drums and tanks prior to off site disposal. All rainwater falling on the plant is collected and treated prior to discharge. (photos 7-12) The facility was built in the early 1970's for the manufacture of Vitamins A and E intermediates from isoprene. Production of the above materials was halted in 1977-78. The plant was revamped in 1979 to produce ethyl vanallin which is still in production. A plant to produce dichloroacetyl chloride was buiit in 1974-76 and is still active. A plant to produce rare earth metals and organo-metalics was built in 1980-81 and is currently active. A plant to produce methyl chlorobenzoate is under construction.
V.4.	filtration unit is used to remove organics. The site was listed as a potential source of dioxins in EPA Publication 600/2-80-197, as a producer of 2,4-dichlorophenol. Four other Rhone-Poulenc facilities are listed in the publication as being producers of pesticides, including 2,4-D and 2,4DB. No information was obtained during the inspection to indicate that 2,4-dichlorophenol was ever produced at the Freeport facility. A search of EPA files (HAZIT, NPDES) did not show 2,4-dichlorophenol being produced at this facility. Based on the information collected by the inspectors, the site presents no hazard and no further action is recommended.

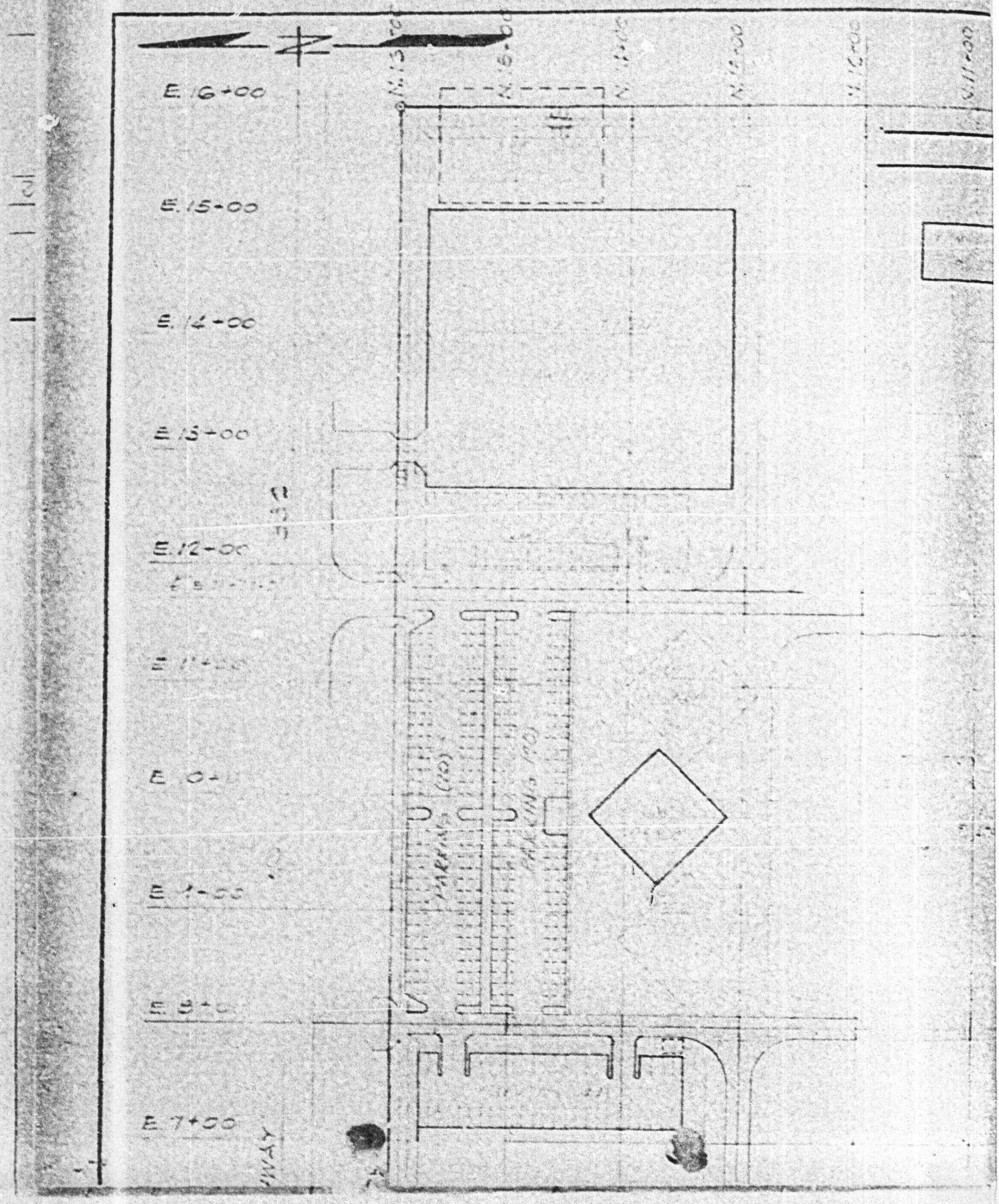


RHONE-POULENC INC.

FREEPORT, TEXAS TX11916




NEW ROCHELLE FACILITY
OVERALL PLOT PLAN
Davy McKee
LOADING AREA



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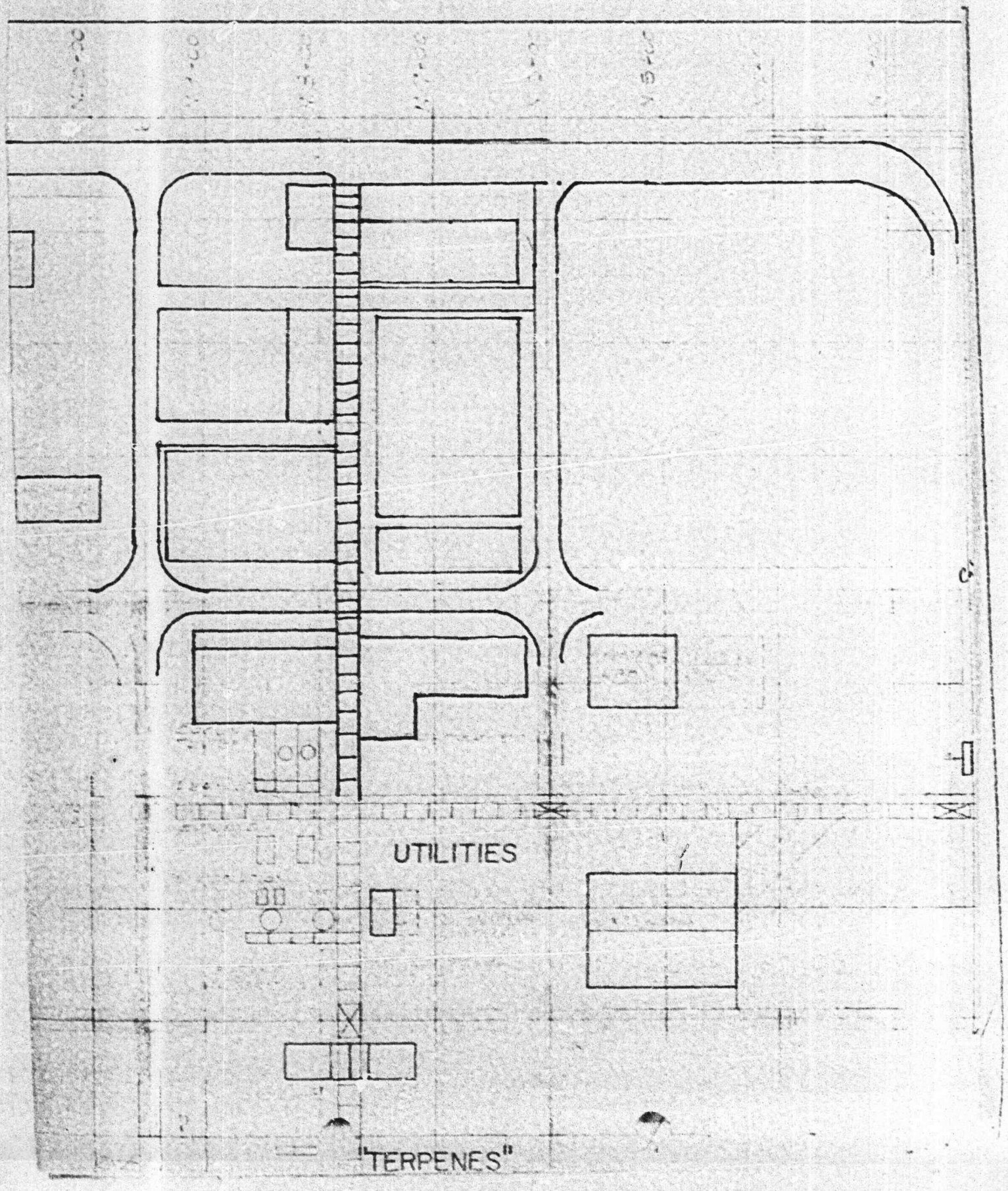
PARKING (10)
PARKING (10)


UTILITIES
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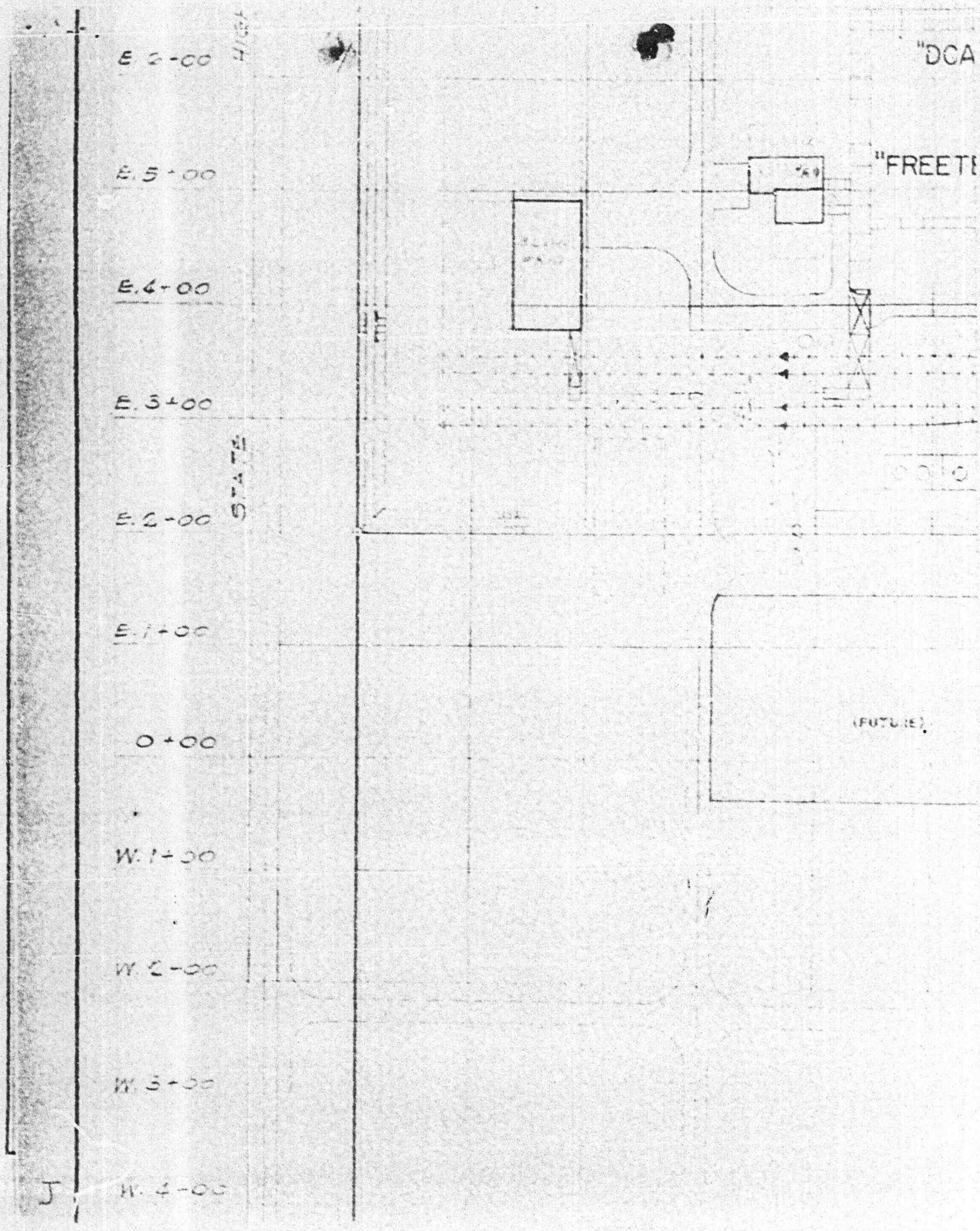
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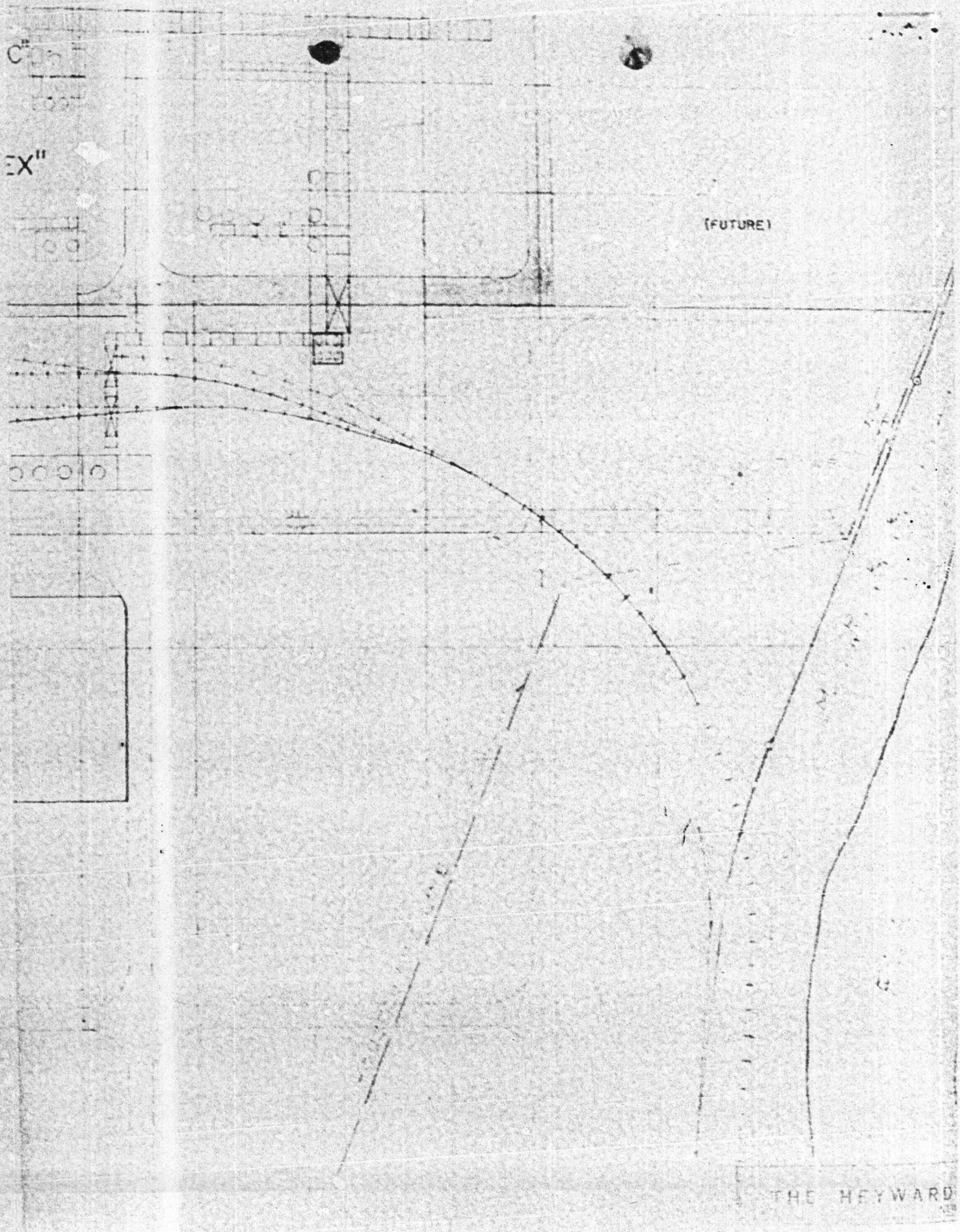
E. 1+00
0+00
W. 1+00
W. 2+00
W. 3+00
W. 4+00
HIGH
STATE
"DCA
"FREETI
(FUTURE)


C"
EX"
(FUTURE)
THE HEYWARD

BROWN & ROOT Inc.

Engineers - Constructors

HOUSTON, TEXAS

DRAWN BY: DOSKOCIL

DATE: 10-14-70

CHK'D BY: EBS

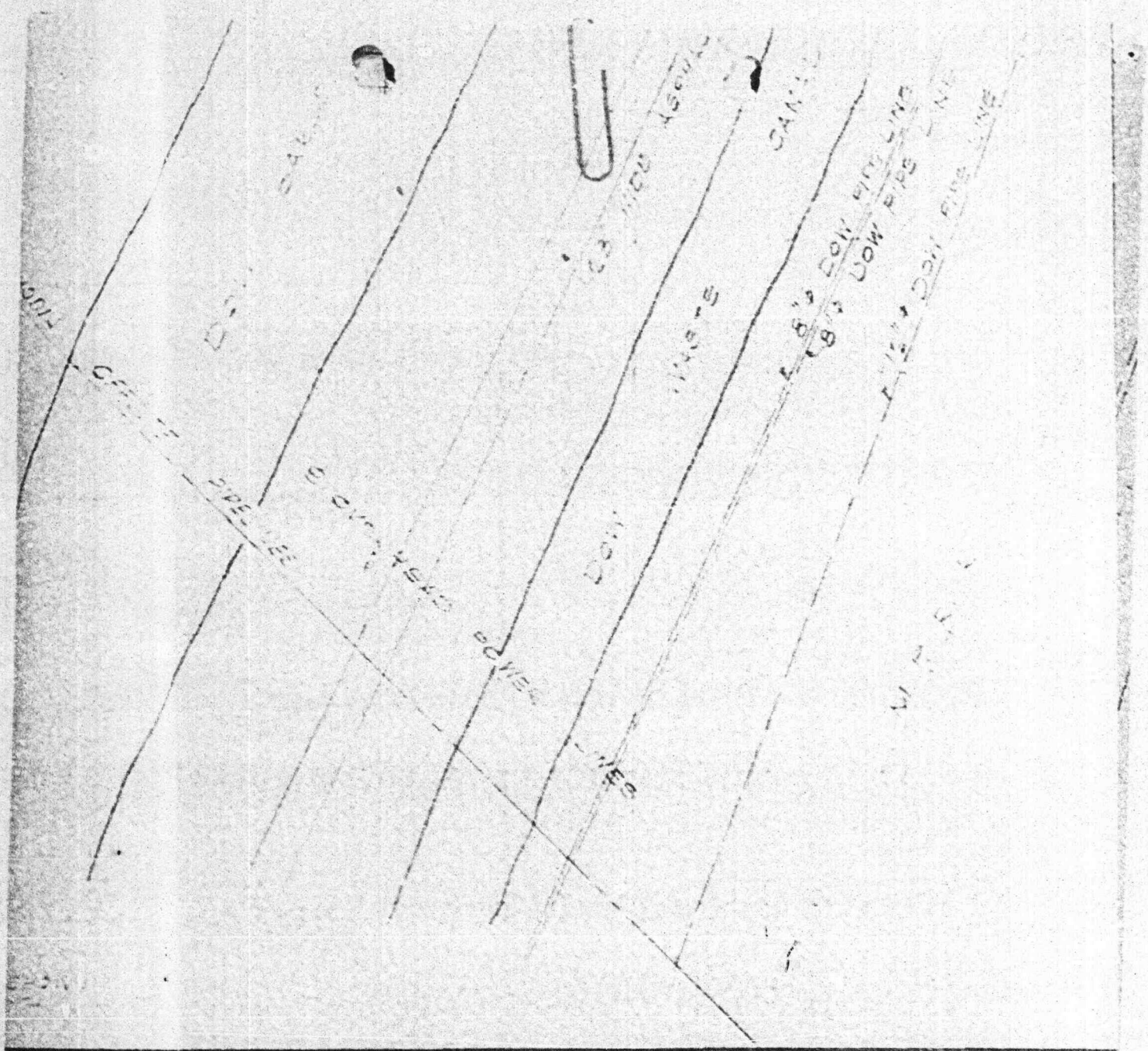
DATE: 10-15-70

SCALE: 1" = 100'-0"

APPROVED	APPROVED

NO

H-R ROBINSON COMPANY INC. NEW YORK



RHODIA INC.

NEW BRUNSWICK, N. J.

DR	CH	APP	DATE
SCALE		W.O. CR-0070	PROJ 11-0[illegible]

SITE DEVELOPMENT
PLOT PLAN
RHODIA CHEMICAL PLANT

REVISION	DATE	BY	APP
		BES	

LOCATION: [illegible] TEX

DWG. NO. 90-PL 6

Photographer / Witness

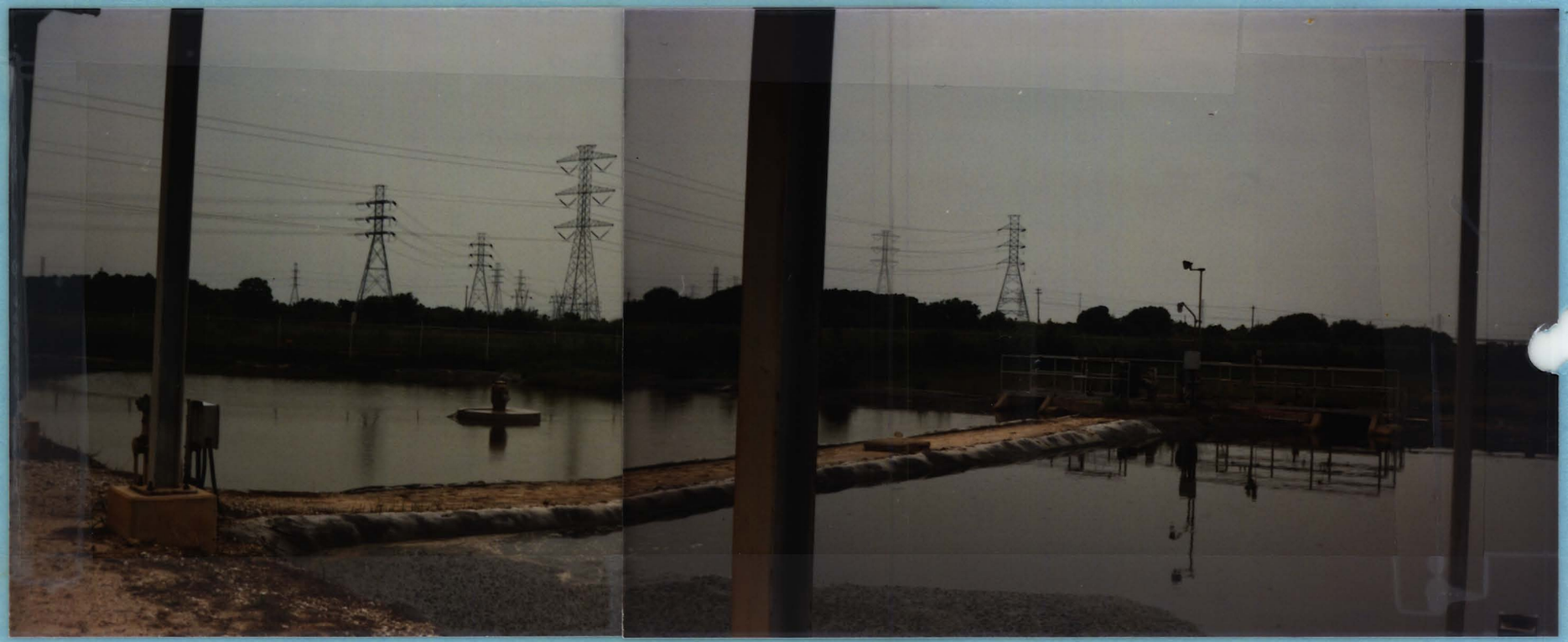
David Anderson / Tom Walzer

Date / Time / Direction

7-21-83 / 1032 / S to ~~E~~ W

Comments:

photos 4-6 S~~E~~ W corner of site, where soil from pond dredging was placed



Photographer / Witness

David Anderson / Tom Walzer

Date / Time / Direction

7-21-83 / 1043 / E to SW

Comments:

photos 7-12

waste water treatment

facility

Photographer / Witness

David Anderson / Tom Walzer

Date / Time / Direction

7-21-83 / 1046 / NE to South

Comments:

photos 13-16

SE Corner of plant,

pile ~~is from~~ in background is

from excavation of fire pond.

Photographer / Witness

David Anderson / Tom Walzer

Date / Time / Direction

7-21-83 / 1050 / NW to E

Comments:

photo 17-20

area north of DCAC

Plant and firepond

Photographer / Witness

David Anderson / Tom Walzer

Date / Time / Direction

7-21-83 / 1115 / NE to East

Comments:

photo 21-23

NE corner of site