Reference 72

9532560

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 5, 1996

CERTIFIED MAIL
P 053 915 622
Mr. Mike Ward, President
Gulf Conservation Corporation
P.O. Box 223
Aransas Pass, Texas 78335

Re: Spill of Regulated Substance at Gulf Conservation Corporation

Dear Mr. Ward:

On December 2, 1995 a release of a petroleum hydrocarbon substance to the environment occurred at the above listed facility. Initial information provided by Mr. Jimmy Dupnik of Gulf Conservation Corporation indicated the spill was of crude oil, a material associated with the oil and gas exploration and production industry. Subsequent to the spill event, inspections of the facility were conducted by Ms. Pam Brown and Mr. Jeff Lewellin of my staff on January 4, 1996 and February 15, 1996. During the January 4, 1996 inspection, samples from one of the two aboveground storage tanks (AST) identified as containing material of the substance discharged in the spill of December 2, 1995 were collected.

Analyses performed of samples collected from the AST indicate oil and vinyl acetate were released during the spill event (copy of the laboratory analyses attached). Based on this information, it is apparent that the spill will need to be remediated under TNRCC guidance, and waste generated be classified and disposed in accordance with 30 TAC Chapter 335.

If you need additional clarification or further assistance addressing this spill incident, please feel free to contact Mr. Lewellin of my staff at (512) 851-8484. If you would like to discuss these issues in person, please contact me at the same telephone number to schedule a meeting.

Sincerely,

Carlton H. Stanley
Carlton H. Stanley
Regional Manager

JCL/amw
Attachment
cc: Mr. Bernie Eickel, Railroad Commission of Texas

72 001

REPLY TO: REGION 14 • 4410 DILLON LN., SUITE 47 • CORPUS CHRISTI, TEXAS 78415-5326 • AREA CODE 512/851-8484

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

printed on recycled paper using soy-based ink

o. IN 24452 District Reg. 14 County S Basin Lab. Core

Discharger Name Time Collected 1600 hrs

Plant Name Gulf Conservation Corp. Point of Collection AST

Method of Flow Measurement N/A

Chlorine Contact Time

Date Shipped 01-04-96

Collector's Signature Jeff Newellin

PERMIT NUMBER	PAGE NO.	CARD TYPE	DATE Mo.	DATE Day	DATE Yr.	MAT. SAMP.
1 - 9	10 - 12	13	14 15	16 17	18 19	20
	001	B	01	04	96	P

21 CODE	26 PARAMETER VALUE	35 CODE	40 PARAMETER VALUE	49 CODE	54 PARAMETER VALUE 62
Flow (gpd)		Water Temperature (°F)		pH	
00056		00011		00400	
D.O. (mg/l)		Turbidity (JTU)			
00300		00070			
VOCs					

TEXAS WATER COMMISSION TWC-0742

No. IN 24452 District Reg. 14

Lab. Used Core Lab. No. PCA91600

Type Sample: Industrial

Grab X Composite Hr.

Observations From Tank Containing petroleum

Material Sampled: Raw, Partially Treated, Final, Stream, S. Waste

Method of Preservation Ice

Auxiliary Tags

Date Completed

Analyst's Signature

21 CODE	26 PARAMETER VALUE	35 CODE	40 PARAMETER VALUE	49 CODE	54 PARAMETER VALUE 62
pH		Conductivity		TSS (mg/l)	
00403		00095		00530	
VSS (mg/l)		BOD (mg/l) 5 day		COD (mg/l)	
00535		00310		00335	
P. Alkalinity (mg/l)		T. Alkalinity (mg/l)		Hardness (mg/l)	
00415		00410		00900	
VOCs					

72 002

CORE LABORATORIES

CORE LABORATORIES
A N A L Y T I C A L R E P O R T

Job Number: 960038
Prepared For:

TNRCC
ERNEST HEYER
P. O. BOX 13087 CAPITOL STATION
AUSTIN, TX 78711-3087

Date: 01/11/96

Signature

Date: 1/12/96

Name: Charles Sassine

CORE LABORATORIES
1733 NORTH PADRE ISLAND DRIVE
CORPUS CHRISTI, TX 78408

Title: Laboratory Supervisor

72 003

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CORELAB

CORE LABORATORIES

LABORATORY TESTS RESULTS
01/11/96

JOB NUMBER: 960038 CUSTOMER: TNRCC ATTN: ERNEST HEYER

CLIENT I.D.....: 24452 PCA 91600
DATE SAMPLED.....: 01/04/96
TIME SAMPLED.....: 16:00
WORK DESCRIPTION...: 24452 FROM TANK CONTAINING PETROLEUM

LABORATORY I.D...: 960038-0001
DATE RECEIVED....: 01/04/96
TIME RECEIVED....: 16:52
REMARKS.....: SAMPLED BY:J.T.

TEST DESCRIPTION	FINAL RESULT	LIMITS/*DILUTION	UNITS OF MEASURE	TEST METHOD	DATE	TECHN
GC/MS Volatile Organics		*1		EPA SW-846 8260	01/05/96	QP
Acetone	<1000	1000	mg/kg	EPA SW-846 8260		
Acrolein	<500	500	mg/kg	EPA SW-846 8260		
Acrylonitrile	<500	500	mg/kg	EPA SW-846 8260		
Benzene	<50	50	mg/kg	EPA SW-846 8260		
Bromodichloromethane	<50	50	mg/kg	EPA SW-846 8260		
Bromoform	<50	50	mg/kg	EPA SW-846 8260		
Bromomethane	<50	50	mg/kg	EPA SW-846 8260		
Methyl ethyl ketone	<500	500	mg/kg	EPA SW-846 8260		
Carbon disulfide	<50	50	mg/kg	EPA SW-846 8260		
Carbon tetrachloride	<50	50	mg/kg	EPA SW-846 8260		
Chlorobenzene	<50	50	mg/kg	EPA SW-846 8260		
Chlorodibromomethane	<50	50	mg/kg	EPA SW-846 8260		
Chloroethane	<50	50	mg/kg	EPA SW-846 8260		
2-Chloroethylvinyl ether	<50	50	mg/kg	EPA SW-846 8260		
Chloroform	<50	50	mg/kg	EPA SW-846 8260		
Chloromethane	<50	50	mg/kg	EPA SW-846 8260		
Dibromomethane	<50	50	mg/kg	EPA SW-846 8260		
Dichlorodifluoromethane	<50	50	mg/kg	EPA SW-846 8260		
1,1-Dichloroethane	<50	50	mg/kg	EPA SW-846 8260		
1,2-Dichloroethane	<50	50	mg/kg	EPA SW-846 8260		
1,1-Dichloroethene	<50	50	mg/kg	EPA SW-846 8260		
trans-1,2-Dichloroethene	<50	50	mg/kg	EPA SW-846 8260		
1,2-Dichloropropane	<50	50	mg/kg	EPA SW-846 8260		
cis-1,3-Dichloropropene	<50	50	mg/kg	EPA SW-846 8260		
trans-1,3-Dichloropropene	<50	50	mg/kg	EPA SW-846 8260		
Ethylbenzene	150	50	mg/kg	EPA SW-846 8260		
Ethyl methacrylate	<50	50	mg/kg	EPA SW-846 8260		
Methyl butyl ketone	<50	50	mg/kg	EPA SW-846 8260		
Iodomethane	<50	50	mg/kg	EPA SW-846 8260		
Methylene chloride	<500	500	mg/kg	EPA SW-846 8260		
Methyl isobutyl ketone	<50	50	mg/kg	EPA SW-846 8260		
Styrene	<50	50	mg/kg	EPA SW-846 8260		
1,1,2,2-Tetrachloroethane	<50	50	mg/kg	EPA SW-846 8260		
Tetrachloroethene	<50	50	mg/kg	EPA SW-846 8260		
Toluene	260	50	mg/kg	EPA SW-846 8260		
1,1,1-Trichloroethane	<50	50	mg/kg	EPA SW-846 8260		
1,1,2-Trichloroethane	<50	50	mg/kg	EPA SW-846 8260		
Trichloroethene	<50	50	mg/kg	EPA SW-846 8260		
Trichlorofluoromethane	<50	50	mg/kg	EPA SW-846 8260		
1,2,3-Trichloropropane	<50	50	mg/kg	EPA SW-846 8260		
Vinyl acetate	2200	50	mg/kg	EPA SW-846 8260		
Vinyl chloride	<50	50	mg/kg	EPA SW-846 8260		
Total Xylenes	870	50	mg/kg	EPA SW-846 8260		

1733 NORTH PADRE ISLAND DRIVE
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(512) 289-2673

72 004

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CORE LABORATORIES

LABORATORY TESTS RESULTS
01/11/96

JOB NUMBER: 960038 CUSTOMER: TNRCC ATTN: ERNEST HEYER

CLIENT I.D.....: 24452 PCA 91600
DATE SAMPLED.....: 01/04/96
TIME SAMPLED.....: 16:00
WORK DESCRIPTION...: 24452 FROM TANK CONTAINING PETROLEUM

LABORATORY I.D...: 960038-0001
DATE RECEIVED....: 01/04/96
TIME RECEIVED....: 16:52
REMARKS.....: SAMPLED BY:J.T.

TEST DESCRIPTION	FINAL RESULT	LIMITS/*DILUTION	UNITS OF MEASURE	TEST METHOD	DATE	TECHN
cis-1,2-Dichloroethylene	<50	50	mg/kg	EPA SW-846 8260		
Methyl t-Butyl Ether	<50	50	mg/kg	EPA SW-846 8260		
Acetonitrile	<50	50	mg/kg	EPA SW-846 8260		
1,4-Dioxane	<5000	5000	mg/kg	EPA SW-846 8260		
Ethyl acetate	<50	50	mg/kg	EPA SW-846 8260		
Ethyl ether	<50	50	mg/kg	EPA SW-846 8260		
Methyl methacrylate	<50	50	mg/kg	EPA SW-846 8260		
1,1,2Trichloro-1,2,2Trifluoroethan	<500	500	mg/kg	EPA SW-846 8260		
1,2,4-Tri-Methylbenzene	430	50	mg/kg	EPA SW-846 8260		
1,3,5-Trimethylbenzene	610	50	mg/kg	EPA SW-846 8260		
1,2,3-Trichlorobenzene	<50	50	mg/kg	EPA SW-846 8260		
1-Methylpyrrolidine	<5000	5000	mg/kg	EPA SW-846 8260		
Dibromofluoromethane(Surrogate)	105	0	% Recovery	80-120% QC LIMITS		
Toluene d-8 (Surrogate)	98	0	% Recovery	81-117% QC LIMITS		
4-Bromofluorobenzene(Surrogate)	103	0	% Recovery	74-121% QC LIMITS		

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72 005

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CORELAB

CORE LABORATORIES

QUALITY ASSURANCE REPORT
01/11/96

JOB NUMBER: 960038 CUSTOMER: TNRCC ATTN: ERNEST HEYER

Volatiles Matrix Spike Compounds DATE ANALYZED: 01/05/96 TIME ANALYZED: 10:02 METHOD: EPA SW-846 8260 QC NUMBER:997970

BLANKS

TEST DESCRIPTION	ANALY SUB-TYPE	ANALYSIS I.D.	DILUTION FACTOR	ANALYZED VALUE	DETECTION LIMIT	UNITS OF MEASURE
Chloromethane	MB	010596	1	<50	50	ug/kg
Vinyl chloride	MB	010596	1	<50	50	ug/kg
1,1-Dichloroethene	MB	010596	1	<10	10	ug/kg
1,1-Dichloroethane	MB	010596	1	<50	50	ug/kg
Chloroform	MB	010596	1	<50	50	ug/kg
Benzene	MB	010596	1	<10	10	ug/kg
Trichloroethene	MB	010596	1	<10	10	ug/kg
1,2-Dichloropropane	MB	010596	1	<50	50	ug/kg
Toluene	MB	010596	1	<10	10	ug/kg
Chlorobenzene	MB	010596	1	<10	10	ug/kg
Ethylbenzene	MB	010596	1	<50	50	ug/kg
Bromoform	MB	010596	1	<50	50	ug/kg
1,1,2,2-Tetrachloroethane	MB	010596	1	<50	50	ug/kg
Acetone	MB	010596	1	<100	100	ug/kg
Acrolein	MB	010596	1	<100	100	ug/kg
lonitrile	MB	010596	1	<100	100	ug/kg
odichloromethane	MB	010596	1	<50	50	ug/kg
Bromomethane	MB	010596	1	<50	50	ug/kg
Methyl ethyl ketone	MB	010596	1	<50	50	ug/kg
Carbon disulfide	MB	010596	1	<50	50	ug/kg
Carbon tetrachloride	MB	010596	1	<50	50	ug/kg
Chlorodibromomethane	MB	010596	1	<50	50	ug/kg
Chloroethane	MB	010596	1	<50	50	ug/kg
2-Chloroethylvinyl ether	MB	010596	1	<50	50	ug/kg
Dibromomethane	MB	010596	1	<50	50	ug/kg
Dichlorodifluoromethane	MB	010596	1	<100	100	ug/kg
1,2-Dichloroethane	MB	010596	1	<50	50	ug/kg
trans-1,2-Dichloroethene	MB	010596	1	<50	50	ug/kg
cis-1,3-Dichloropropene	MB	010596	1	<50	50	ug/kg
trans-1,3-Dichloropropene	MB	010596	1	<50	50	ug/kg
Ethyl methacrylate	MB	010596	1	<50	50	ug/kg
Methyl butyl ketone	MB	010596	1	<50	50	ug/kg
Iodomethane	MB	010596	1	<50	50	ug/kg
Methylene chloride	MB	010596	1	<500	500	ug/kg
Methyl isobutyl ketone	MB	010596	1	<50	50	ug/kg
Styrene	MB	010596	1	<50	50	ug/kg
Tetrachloroethene	MB	010596	1	<50	50	ug/kg
1,1,1-Trichloroethane	MB	010596	1	<50	50	ug/kg
1,1,2-Trichloroethane	MB	010596	1	<50	50	ug/kg
Trichlorofluoromethane	MB	010596	1	<50	50	ug/kg
1,2,3-Trichloropropane	MB	010596	1	<50	50	ug/kg
Vinyl acetate	MB	010596	1	<100	100	ug/kg
Total Xylenes	MB	010596	1	<50	50	ug/kg

1733 NORTH PADRE ISLAND DRIVE
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CORE LABORATORIES

QUALITY ASSURANCE REPORT
01/11/96

JOB NUMBER: 960038 CUSTOMER: TNRCC ATTN: ERNEST HEYER

Volatiles Matrix Spike Compounds DATE ANALYZED: 01/05/96 TIME ANALYZED: 10:02 METHOD: EPA SW-846 8260 QC NUMBER:997970

REFERENCE STANDARDS

TEST DESCRIPTION	ANALYSIS SUB-TYPE	ANALYSIS I. D.	DILUTION FACTOR	ANALYZED VALUE	TRUE VALUE	PERCENT RECOVERY	DETECTION LIMITS	UNITS OF MEASURE
Chloromethane	CC	531.6.1	1	105	100	105	50	ug/kg
Vinyl chloride	CC	531.6.1	1	106	100	106	50	ug/kg
1,1-Dichloroethene	CC	531.6.1	1	120	100	120	10	ug/kg
1,1-Dichloroethane	CC	531.6.1	1	107	100	107	50	ug/kg
Chloroform	CC	531.6.1	1	106	100	106	50	ug/kg
Benzene	CC	531.6.1	1	105	100	105	10	ug/kg
Trichloroethene	CC	531.6.1	1	108	100	108	10	ug/kg
1,2-Dichloropropane	CC	531.6.1	1	107	100	107	50	ug/kg
Toluene	CC	531.6.1	1	107	100	107	10	ug/kg
Chlorobenzene	CC	531.6.1	1	108	100	108	10	ug/kg
Ethylbenzene	CC	531.6.1	1	109	100	109	50	ug/kg
Bromoform	CC	531.6.1	1	110	100	110	50	ug/kg
1,1,2,2-Tetrachloroethane	CC	531.6.1	1	113	100	113	50	ug/kg
Dibromofluoromethane(Surrogate)	CC	531.6.1	1	47	50	94	5	ug/kg
T ne d-8 (Surrogate)	CC	531.6.1	1	51	50	102	5	ug/kg
4 mofluorobenzene(Surrogate)	CC	531.6.1	1	51	50	102	5	ug/kg

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QUALITY ASSURANCE REPORT
01/11/96

JOB NUMBER: 960038 CUSTOMER: TNRCC ATTN: ERNEST HEYER

Volatiles Matrix Spike Compounds DATE ANALYZED: 01/05/96 TIME ANALYZED: 10:02 METHOD: EPA SW-846 8260 QC NUMBER:997970

MATRIX SPIKES

TEST DESCRIPTION	ANALYSIS SUB-TYPE	ANALYSIS I. D.	DILUTION FACTOR	ANALYZED VALUE	ORIGINAL VALUE	SPIKE ADDED	PERCENT RECOVERY	DETECTION LIMITS	UNITS OF MEASURE
1,1-Dichloroethene	MS	960068-1	1	530	0	500	106	10	ug/kg
	MSD	960068-1	1	520	0	500	104	10	ug/kg
Benzene	MS	960068-1	1	490	0	500	98	10	ug/kg
	MSD	960068-1	1	450	0	500	90	10	ug/kg
Trichloroethene	MS	960068-1	1	480	0	500	96	10	ug/kg
	MSD	960068-1	1	470	0	500	94	10	ug/kg
Toluene	MS	960068-1	1	490	0	500	98	10	ug/kg
	MSD	960068-1	1	470	0	500	94	10	ug/kg
Chlorobenzene	MS	960068-1	1	500	0	500	100	10	ug/kg
	MSD	960068-1	1	480	0	500	96	10	ug/kg
Dibromofluoromethane(Surrogate	MB	010596-00	1	50	0	50	100	5	ug/kg
Toluene d-8 (Surrogate)	MB	010596-00	1	49	0	50	98	5	ug/kg
4-Bromofluorobenzene(Surrogate	MB	010596-00	1	48	0	50	96	5	ug/kg

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72 008

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CORE LABORATORIES

QUALITY ASSURANCE FOOTER

Cited Methods are obtained from the following documents :

EPA 600/2-79-020, Methods for the Analysis of Water and Wastes, March 1983.
USEPA SW-846 3rd. Edition, November 1990 and July 1992 Update, Test Methods for Evaluating Solid Waste.
EPA 600/2-78-054, Field and Laboratory Methods Applicable to Overburdens and Minesoils.
Federal Register, July 1, 1992 (40 CFR Part 136).
Standard Methods for the Examination of Water and Wastewater, 18th Ed. APHA, AWWA, WPCF.
Methods of Soil Analysis, Agronomy No. 9, C.A. Black, 1965.

Quality control acceptance criteria are method dependent.
All data reported on sample "as received" unless noted.
Sample IDs with a "-00" at the end indicate a blank spike or blank spike duplicate associated with the numbered sample.
NC = Not Calculated due to value at or below detection limit.
NOTE: Data in QA report may differ from final results due to digestion and/or dilution of sample into analytical range.
The "TIME ANALYZED" in the QA report refers to the start time of the analytical batch which may not reflect the actual time of each analysis. The "DATE ANALYZED" is the actual date of analysis.
The data in this report are within the limits of uncertainty specified in the referenced method unless otherwise indicated.

SUBCONTRACTED LABORATORY LOCATIONS

For analyses performed by a subcontract laboratory, an "*" and the designated laboratory code is indicated in the "TECHN" column of the laboratory test results report.

Core Laboratories :

Anaheim	*AN	Lake Charles	*LC
Aurora	*AU	Long Beach	*LB
Casper	*CA	Other Laboratories	*XX
Houston	*HP		

QUALITY ASSURANCE REPORT CODES

BLANKS*

MB = Method Blank
RB = Reagent Blank
SB = Storage Blank
ICB = Initial Calib. Blank
CCB = Continuing Calib. Blank

REFERENCE STANDARDS

RS = Reference Standard
CC = Continuing Calib.
LCS = Laboratory Control Std.
ICV = Initial Calib. Verification
CCV = Cont. Calib. Verification

SPIKES AND DUPLICATES

MS = Matrix Spike, BS = Blank Spike
SS = Surrogate Spike, MD = Matrix Dup.
PDS= Post Digested Spike
MSD= Matrix Spike Duplicate
PDD= Post Digested Duplicate

*In the event that several different method blanks are analyzed, the blank type will be designated by the preparation method, i.e., ZHE, TCLP, 3010, 3050, etc.

1733 NORTH PADRE ISLAND DRIVE
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