Message

From: Harrison, Ben [Harrison.Ben@epa.gov]
Sent: 3/23/2019 9:08:14 PM
To: Quinones, Edwin [quinones.edwin@epa.gov]
Subject: Fwd: TCEQ Immediate Action Needed - ITC

FYI

Ben Harrison
Deputy Regional Counsel

Begin forwarded message:

> **From:** Margaret Ligarde <margaret.ligarde@tceq.texas.gov>
> **Date:** March 23, 2019 at 4:04:54 PM CDT
> **To:** "payne.james@epa.gov" <payne.james@epa.gov>
> **Cc:** "Harrison.Ben@epa.gov" <Harrison.Ben@epa.gov>, Stephanie Bergeron Perdue <Stephanie.Bergeron_Perdue@tceq.texas.gov>
> **Subject: Fwd: Immediate Action Needed - ITC**
>
> Jim
>
> Sharing immediate action notice issued by TCEQ Executive Director to ITC at 3:27 pm today.
>
> Please let me know if you have questions.
>
> Margi
>
> Begin forwarded message:
>
> > **From:** Toby Baker <Toby.Baker@tceq.texas.gov>
> > **Date:** March 23, 2019 at 3:27:44 PM CDT
> > **To:** "molly.cagle@bakerbotts.com" <molly.cagle@bakerbotts.com>, "bnetland@iterm.com" <bnetland@iterm.com>
> > **Cc:** Stephanie Bergeron Perdue <Stephanie.Bergeron_Perdue@tceq.texas.gov>, "priscilla.hubenak@oag.texas.gov" <priscilla.hubenak@oag.texas.gov>, "nkidd@tamus.edu" <nkidd@tamus.edu>, Margaret Ligarde <margaret.ligarde@tceq.texas.gov>, Kelly Cook <kelly.cook@tceq.texas.gov>, Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
> > **Subject: Immediate Action Needed - ITC**
> >
> > Good Afternoon,
> >
> > Based on the failure of secondary containment and the reignition of the site and connected ditch on March 22, accompanied with eroding public confidence in ITC's response, TCEQ hired its own expert to assess the ongoing response by ITC. After assessing the site this morning, the following observations should be addressed immediately:
> >
> > First and foremost, the primary safety concern is reignition at the tank farm.
> > Fire Suppression:

- Tune up the foam application program currently in place. The proportioning percentage of the foam may not match the type of foam currently being used. This is evident by visual inspection of the foam blankets throughout the area.
- The tank farm area needs to be ringed with semi-fixed unmanned nozzles to maximize coverage and a realistic foam run to extinguish quickly any possibly future reignitions. This will also decrease the amount of water/foam used thus minimizing runoff.
- Equipment recommendations would include 6 screaming eagle or hemisphere semi-fixed nozzles and 2 large flow nozzles. Would also recommend an infrared or thermal imaging camera to read and/or detect any vapor yields.
- Develop a comprehensive hydraulic plan to ensure monitors discharge simultaneously.
- Evacuation of liquid inside secondary containment wall needs to be addressed asap.
- Continue aggressive metering and monitoring plan around tank farm area.
- Based on information from foam producers, the industry is at a critical level of AR AFFF 1x3 Foam.
- Firefighting team needs to focus on fire protection, fire suppression and vapor suppression not dewatering of secondary containment.

Environmental:

- Deploy 42" containment boom at mouth of Tucker Bayou where it enters Buffalo Bayou. Some of the released material is escaping under the 18" containment boom currently in place.
- Contain runoff to property. This has not been addressed adequately. Dam the ditches adjacent to the tank farm and waste water treatment plant and evacuate with large pumps and discharge in storage tank(s) on property. Although the secondary containment has buckled and spilled contents into ditch, block or dam the ditches and use as secondary containment while simultaneously evacuating utilizing 6" to 12" pumps and transfer into storage tank on property.
- Start skimming operations in Tucker Bayou near Buffalo Bayou to start removing product. Currently, vacuum trucks are skimming with an open hose which is inefficient. Utilize actual skimming equipment for product removal. Flush Tucker Bayou beginning at Tidal Rd to collection points near Buffalo Bayou for removal.
- Continue aggressive metering and monitoring plan throughout facility where work is being performed.

Runoff containment/control – contain runoff to property / evacuate runoff utilizing trucks, pumps, etc… and store on site

Marine operations – utilize skimmers to remove material in water / maintain containment utilizing 42" containment boom. Flushing operations of Tucker Bayou.

Fire Safety/Fire Protection – coordinated effort with on-site resources to provide fire safety/suppression as needed for vapor control or reignition. This must be a manned operation at all times while work is being performed.

These operations can be performed simultaneously, not one area at a time. With a coordinated effort by parties involved, results will come quicker than currently projected.

TCEQ has two experts, Chauncey Naylor and Herman Ladner, from Williams Fire and Hazard Control onsite with our contractor. They are available to provide guidance with fire protection/suppression and vapor suppression activities, as well as how to safely dewater secondary containment. Please provide a response plan as to how the above list is being addressed by 5:30 PM today. Thank you.

Toby Baker

Executive Director, Texas Commission on Environmental Quality