UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
HOUSTON BRANCH
10625 FALLSTONE RD.
HOUSTON, TEXAS 77099

NES 3-2-5

EPA REGION 6
HOUSTON BRANCH
AIR INSPECTION REPORT

Inspection Date: November 15, 1994

Company Name AMOCO Oil Company

Mailing address Texas City Refinery
2401 5th Avenue South
P.O. Box 401
Texas City, Texas 77592-0401

Type of Industry Refinery

Company Personnel	Name	Title	Phone
Responsible for Facility	Ken Marshall	Refinery Mgr.	409-945-1011
Responsible for Environmental	Gary Scoggin	Env. Superintendent	409-945-1147
	Javier M. Lopez	Env. Engineer	409-945-1156
	Kathleen Semien	Remediation Coord.	312-856-6858

EPA Personnel Jake Medellin Environmental Scientist 713-983-2151

On November 15, 1994, an inspection of a radionuclide facility was conducted at Amoco Oil Company located at 2401 5th Avenue South in Texas City, Texas. The purpose of the inspection was to determine facility compliance status with National Emission Standards for Hazardous Air Pollutants (NESHAPs) Subpart R. Javier M. Lopez, Environmental Engineer, accompanied the inspector. During the inspection of the phosphogypsum stacks, a NESHAPs Subpart M asbestos inspection was also performed due to a demolition that occurred August 13, 1987.

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Facility Description

The phosphogypsum stack is located on a 114 acre tract on which Borden, Incorporated operated a phosphate fertilizer plant; the plant was built according to plant personnel sometime in 1950. The Amoco Oil Company purchased the site from Borden, Inc. in 1978 on an "as is" basis. A map of the plant site was presented in the June 1993 inspection. The following nine areas were marked on this map.

1. The main phosphogypsum stack which covers approximately 33.3 acres and is about 35 feet high.

2. The smaller phosphogypsum stack which is adjacent to the main stack in the northeast corner of the site and covers approximately 5.8 acres and is about ten feet high.

3. The moat covers approximately 21.3 acres on the east, south, and west sides of the main phosphogypsum stack.

4. The area between the main phosphogypsum stack and the junkyard which covers approximately 1.2 acres.

5. The junkyard north of the main phosphogypsum stack which occupies about 2.4 acres.

6. The surge ponds are west of the junkyard which covers approximately 3.7 acres.

7. Drainage ditches in the process area which is the northern one-third of the site.

8. The sludge pile which covers approximately 0.1 acres directly southwest of the process building.

9. Buildings.

NOTE: The only difference that has occurred since the last inspection is that the NPDES outfall #1 was decommissioned in June of 1993. See Attachment #1.

These nine areas are contaminated with radioactive material. Mr. Scoggin, Superintendent, Env. Control, explained that the buildings were demolished in August 13, 1987 except for the administrative building which is the building nearest to the gate. Radioactive sludges and materials were buried in the main phosphogypsum stack. The phosphogypsum stack has not been removed from the stacks. The reason for the demolition according to Mr. Scoggin was to prevent

materials from flying onto their refinery property in case of a hurricane, storm, etc.

A compliance test for Radon-222 flux from the two inactive phosphogypsum stacks was performed on March 27-29, 1990. The mean radon flux for the phosphogypsum stack was calculated to be 17.4 pCi/m2-s which is less than the standard of 20 pCi/m2-s.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Subpart M -- Asbestos

During the site inspection of the phosphogypsum stacks and the adjoining sites (cover of trees and grass), the inspector observed what was left of the demolition of the buildings and process fertilizer plant that were demolished in 8/13/87. None of the debris was buried in the main stack phosphogypsum stack as mentioned to the EPA inspector (George Marusak) at the time of his inspection (08/18/92). According to Mr. Marusak's report, a Mr. Barton Brown, Environmental Control Project Coordinator at the time of inspection (has been transferred to Chicago, IL), stated that radioactive sludges and materials from the demolition had been buried in the main phosphogypsum stack. A telephone call (06/22/93) to Mr. Watson Dupont, Superintendent of Environmental Services, stated that no materials had been buried to the best of his knowledge in the main phosphogypsum stack.

Amoco Oil Company contracted SPN Dismantling, Inc., August 13, 1987 to perform demolition at the Borden Phosphite Ore Processing site. The inspector contacted Edward N. Siebert Jr., Vice President of SPN Dismantling at home (phone # 713-721-3223 06/24/93). He stated the company no longer exists; the contract stated that normal occurring radioactive material (NORM) was present and that he was to take off the transite from a building before demolition and wrap in plastic; he was not to transport any material off of the premises. Mr. Siebert stated that he placed the material in a 30 cubic yard dumpster supplied by Amoco Oil Company. He has no idea what happened to the transite he placed in the 30 cubic yard dumpster after the demolition. Mr. Siebert did not bury anything.

According to Gary Scoggin, Superintendent, Environmental Control, SPN, Inc. first took off the transite, enveloped the sheets in plastic before demolition and placed in a stack somewhere. The

removal of material from the property according to the facility has historically been a concern since the site contains low levels of radioactive material (presently 17.4 pCi/m2s -- almost 6 years after demolition). Approximately 30 cubic yards of transite sheets are still present stacked onsite and are not covered with plastic; some of the material is friable. The facility submitted a work plan for asbestos removal August 16, 1994 for the Borden property; see Attachment #2. This abatement was cancelled since the material may not be accepted by a landfill and/or the facility was thinking of perhaps burying the material onsite.

Mr. Lopez is investigating landfills that may accept the asbestos containing material and NORM(s). Amoco may also bury the transite onsite, but this may make the property an inactive landfill.

Mr. Scoggin claims that the reason they demolished all structures (with the exception of the former administration building) was that the buildings were not being maintained and that this would constitute a safety hazard in the event of a hurricane or other period of heavy winds. **This still constitutes a safety hazard in the event of a hurricane or other periods of heavy winds today.**

This inspector recommends that all environmental staff attend an EPA Accredited Supervisor/Contractor Asbestos Abatement Course that covers NESHAPs Subpart M as soon as possible.

NOTE: The person in charge of what is to happen to the transite panels is Kathleen Semien at 312-856-6858; an attempt was made to contact her 11/28/94. She did not return the inspector's phone message.

Attachments

1. Request for revocation of TWC Permit No. 00450

2. Work plan for Asbestos Abatement Project