IHW-31376-IN

Texas Commission on Environmental Quality
Investigation Report
LONGVIEW REFINING ASSOCIATES INC
CN600617252

LONGVIEW REFINING
RN101059426

INFORMATION COPY

Investigation # 464432 **Incident #**

Investigator: DALE VODAK **Site Classification**

Conducted: 05/02/2006 -- 05/11/2006 **SIC Code:** 2911
NAIC Code: 32411

Program(s): INDUSTRIAL AND HAZARDOUS WASTE NONPERMITTED
INDUSTRIAL AND HAZARDOUS WASTE GENERATION
EMERGENCY RESPONSE

Investigation Type : Compliance Investigation **Location :** 601 Premier Rd, Longview, TX

Additional ID(s) : TXD045586187
31376

Address: 601 PREMIER RD;
LONGVIEW, TX 75604

Activity Type: REGION 05 - TYLER
IHWCSE - On-site follow-up investigation

Principal(s) :

Role	Name
RESPONDENT	LONGVIEW REFINING ASSOCIATES INC

Contact(s) :

Role	Title	Name	Phone	
Participated in Investigation	ON-SCENE COORDINATOR	MR PATRICK HAMMACK	Work Cell	(214) 665-2214 (214) 435-1721
Participated in Investigation	COMMISSIONER PRECINCT #2	MR DARRYL PRIMO	Work	(903) 759-3611 (903) 759-6707
Regulated Entity Contact	COUNTY JUDGE	HON BILL STOUDT	Work	(903) 236-8420

Other Staff Member(s) :

Role	Name
Investigator	THOMAS ERNY
QA Reviewer	THOMAS ERNY
Investigator	COLLEEN FLEMING

Associated Check List

Checklist Name	Unit Name
EMERGENCY RESPONSE INVESTIGATION	LRA Emergency Response

Investigation Comments :

INTRODUCTION

From 05/02/2006 through 05/11/2006, Investigators Dale Vodak, P.G., Tom Erny, P.G., and Colleen Fleming of the TCEQ Region 5 Tyler Office conducted an IHW Enforcement Follow-up (CSE) and emergency response investigation at the abandoned Longview Refining Associates (LRA) refinery. The LRA plant is located at 601 Premier Road in the city of Longview, in the central portion of Gregg County. This facility ceased operations in early 1992. Although there have been several emergency response actions conducted at the site since that time, process equipment and chemical containers left onsite have continued to degrade since that time. The purpose of the current investigation was to verify the enforcement status of site, and check for further degradation of the equipment and containers still

stored onsite. The current owners of the abandoned refinery are Gregg County, Pinehill Independent School District (ISD) and Gladewater ISD. Gregg County and the two ISDs acquired control of the property due to delinquent taxes following the bankruptcy of LRA in 2001. During the multi-day investigation a series of photos (Photos #1- #48) were taken to document conditions on-site.

CHRONOLOGY

A brief chronology of each day of the investigation is as follows:

05/02/2006 at 1200 Hours – TCEQ Investigators Vodak, Erny and Fleming met at the facility gate with Gregg County Engineer Mike Bills, EPA Region 6 On-scene Coordinators (OSCs) Pat Hammack and Mark Hayes, and members of the EPA START Team. The five person START team assessment was from Weston Solutions, and lead by Mr. Derek Cobb. The team met at the site with Gregg County Engineer Mike Bills.

During the afternoon of 05/02/2006, the group did an initial walk through the abandoned refinery looking for problem areas. A series of large, man-sized holes were observed in the perimeter fence, indicating fresh break-ins since the last site visit in 2004. Fresh spills and discharges of unknown waste materials were observed in the change house, warehouse and laboratory areas. Additional containers of waste were observed in the plant warehouses, which had previously been thought to hold only empty containers. Additional evidence of vandalism was noted, as large quantities of copper wiring had been removed by thieves. Mr. Bills noted that during the last year he had been in a losing battle with vandals and thieves trying to keep them out of site. During the later part of this day of the investigation, Gregg County Precinct 2 Commissioner Daryl Primo came by and spoke to Investigator Vodak.

Based on the observations made during the site walk-through, OSC Hammack indicated that the tanks and waste containers abandoned on-site posed an imminent and substantial threat. He then initiated an emergency response action to secure and remove hazardous materials and wastes from the site. He indicated that he would also re-secure the property to prevent further degradation of the equipment and tanks by vandals. The TCEQ team left the site for the day at 1600 Hours and returned to Tyler Region Office.

05/03/2006 - TCEQ Investigators Vodak, Erny and Fleming arrived on-site at 0630 Hours and attended the morning EPA and START daily safety briefing. After the briefing, TCEQ, EPA and START personnel teamed up and entered the facility looking for leaking containers, leaking tanks, and process units. The team screened all of the tanks and containers found with an ISG K-90 Talisman Thermal Imager, checking for liquid lines. New leaks were observed in the Powerformer and Hydrofiner units, which were not previously observed during the last visit in 03/2004. The locations of tanks and drums observed were photographed and then noted on the appropriate site diagram (Attachment #1). All of the process areas of the plant were heavily overgrown with vegetation, brush and small trees. The plant wastewater ponds were all observed to full of weeds and cattails.

As previously noted, thieves have done significant new structural damage to the electrical and steam conduit piping, resulting in exposure of insulation materials to the elements. The team also found evidence of a break-in which occurred the previous evening in the LPG Unit (Southwest corner of the plant). Shortly after this discovery, Longview Police Officer Lisa Chatterton entered the site through a hole at the rear of the site on the track of thieves who had robbed a nearby electrical contractor facility the previous evening. Officer Chatterton went on to document the break-in and collected physical evidence. This evidence included: a burnt-out winch, gloves, a car battery, chains, and several bottles of vegetable oil used to pull the one inch thick copper cables from the conduit pipes. The team recovered several large mercury thermometers from a box of laboratory glassware discovered in the same location.

EPA START personnel conducted a level "B" entry inside the plant laboratory, and discovered beads of mercury on the laboratory benches. The START personnel commenced to inventory the chemicals and materials abandoned inside the lab and the adjacent collapsed storage shed. The storage shed was found to contain several hundred unlabeled glass bottles and metal containers of liquid and solid wastes. A brush-hog was brought in to clear the brush and small trees from around the lab building, to give un-restricted access. EPA START personnel setup a field lab in the old plant maintenance

building adjacent to the lab. Chad conway and Michelle Brown of EPA START commenced to hazard category (HAZCAT) all of the unknowns materials and chemicals found onsite. A temporary container storage area was also established inside the maintenance building.

This day of the investigation ended at 1530 Hours.

05/04/2006 - Investigators Erny and Vodak arrived on-site at 07:00 Hours. Staff attended the daily safety briefing with EPA START and United States Environmental Services (USES) personnel. USES is EPA Region 6's emergency response contractor. The investigators met briefly with Mr. Matt Salinger, Crew Chief for USES. During this day of the investigation, the investigators assisted by START personnel finished the thermal imaging of the tanks and drums onsite. The investigators then observed HAZCAT operations and USES personnel commence the segregation and repackaging of the various wastes in the plant warehouse. When repackaged, hazardous wastes were staged for removal from the site. Non-hazardous wastes were staged in the plant warehouse, and were left onsite.

During the afternoon, Longview Fire Department Hazardous Materials team personnel and the investigators used a Smith Detection TravelIR and HazmatIR instruments to screen waste samples. This information was confirmed with EPA START.

This day of the investigation ended at 1615 Hours.

05/08/2006 - Investigator Vodak arrived on site at 1130 AM, and met with Pat Hammack and EPA START personnel. Mr. Derek Cobb of EPA START indicated that they had completed 670 HAZCAT analyses on waste stored in tanks and containers. USES personnel finished stage waste in the plant warehouse and started lab packing the laboratory wastes on this date. START and USES personnel emptied several small tanks of waste discovered at various locations on-site. Approximately 200 drums of non-hazardous waste were observed stored in the old plant warehouse, which would be secured before EPA left the site. A vacuum truck was used to remove approximately 4,000 gallons of caustic solution (pH 13 s.u.) from Tank 11-B.

This day of the investigation ended at 1415 Hours.

05/09/2006 - At 1300 PM, Investigators Tom Erny and Colleen Fleming checked operations on site operations. EPA START and USES personnel were busily engaged in the HAZCATing and repackaging of wastes. Repairs were underway to the perimeter fences at the site.

This day of the investigation ended at 1430 Hours.

05/11/2006 - Investigator Vodak arrived on site at 1630 PM, and took a photo the approximately 90 drums of hazardous wastes staged in the parking lot at the front of the abandoned Longview Refining Associates plant.

This day of the investigation ended at 1700 Hours. This was the last day of the investigation.

NOTE: Investigator Vodak took a photo of the site during a 06/26/2006 overflight of the Longview area.

OBSERVATIONS

During the walking tours of the site, the team made the following observations in the plant:
1) Continued leakage of oily waste inside the secondary containment of Tank 23;
2) Approximately 60 leaking or spilled drums, and containers found inside the plant warehouse;
3) Thermal imaging showed several feet of waste (caustic) liquid inside Tanks 11A and 11B;
4) ½ full drum of spent ceramic catalyst balls stored in the open area between Tanks 11B and Tank 7;
5) Two abandoned drums labeled well cuttings stored in the container storage area (NOR Unit 002);
6) Unknown, tarped pile of an unknown waste material was observed stored on the west side of Tank 39 inside the firewall;
7) Continued degradation and vandalism of waste containers stored inside the plant laboratory;
8) Two high pressure cylinders and three drums unknown wastes discovered on the south side of the

lab building;
9) Collapsed shed adjacent to the lab was found to contain hundreds of small containers of unknown chemicals;
10) Heat exchanger bundle cleaning wastes were observed in two places at the plant:
a) Area along the perimeter road on the west side of Tank 39;
b) South side of the large heater unit associated with the Hydrofiner / Powerformer Unit.

NOTE: This area was originally identified during CEI investigation 10/27-11/06/1991.

11) Leaks of an unknown oily waste inside the Lithofiner/BSCM Unit;
12) A large area of dead vegetation was observed on the south side of the Lithofiner/BSCM unit indicating a potential underground leak;
13) Discharges of an unknown white material on the ground under the catalyst storage tanks (previously reported);
14) A seventh groundwater monitor well discovered inside the secondary containment of Tank 39.

NOTE: All of the monitoring wells onsite were secured with locks, but the protective casings were rusted and in poor condition. The keys to the well locks were not available to the team.

Many of these observations were reported during the last enforcement follow-up investigation at the site in 2005 (Investigation No. 379072).

GENERAL FACILITY AND WASTE PROCESS INFORMATION

LRA is an inactive petroleum refinery. The plant has been inactive since 08/1992. During the current investigation, several units at the site were still storing waste materials. These included tanks, container storage areas, three API separators, six wastewater surface impoundments and the various refinery process units. None of the units at the LRA facility have been in operation since 1992. During previous investigations, facility personnel had indicated that process equipment and piping at the LRA site had been "pickled" (filled with diesel fuel to prevent internal corrosion).

Since 1992 when the refinery closed, TCEQ and the EPA have conducted two emergency response actions to abate releases of hazardous materials from leaking containers at the site. Further degradation and breakdown of the on-site equipment is probable at the LRA site and should be expected.

Since the LRA facility had been abandoned by the former owners, there was no exit interview. All of the records at the plant site appear to have been destroyed or lost, so a record review was not conducted. The investigation did involve records at the Tyler Regional Office. In addition, the "February, 2001 Screening Site Inspection Report", prepared by the TCEQ Site Discovery and Assessment Program Staff, confirms that the groundwater at the site has been impacted with varying amounts of the following volatile organic chemicals and heavy metals: Acetone, 2-Butanone, Cyclohexane, Methylcyclohexane, Toluene, Ethylbenzene, Xylenes, Isopropylbezene, 2-Methylnapthalene, Aluminum, Barium, Chromium, Copper, Lead, and Zinc. A full copy of this report is available in the Region 5 Tyler files.

During the investigation, the investigator again documented that LRA has still not been brought into compliance with the provisions of the 03/15/1995 Agreed Order. Additional comments pertaining to ongoing violations are noted under Areas of Concern, but no new violations were noted.

BACKGROUND

The following outline is a brief chronology of events which have occurred since the issuance of the Agreed Order on 03/15/1995. Comments have been added as appropriate to each date.

03/15/1995 - LRA entered into Agreed Order (AO), Docket No. 95-0417-IHW-E, with the Commission

to resolve both industrial waste and hazardous waste, and water quality violations. The AO required LRA to perform an assessment of releases on-site, cleanup of releases and closure of the waste management units on-site. Based on the current investigation, all of the ordering provisions in the AO are currently unresolved.

12/271996 through 05/16/1997 - State-Lead Emergency Response to a diesel fuel range contaminant discovered in the creek located at the front of the plant below the LRA loading rack.

01/16/1997 - Comprehensive Evaluation Investigation (CEI) at the LRA Plant.

5/16/1997 - Record Review Investigation conducted as a followup to a discharge of diesel range contaminants discovered in the creek.

05/07/1998 - EPA Region 6 conducts a wastewater investigation at the LRA plant.

05/27/1999 - CEI conducted at the LRA plant.

07/02/1999 - LRA files for Chapter 11 bankruptcy in the United States Bankruptcy Court for the Eastern District of Texas (USBCEDT), Case #99-61379.

08/02/1999 - LRA wastewater permits expired (TNRCC Permit No. 00572, NPDES Permit No. TX00000531).

12/15/1999 - Initial site visit by TNRCC Site Assessment and Management Section (SAMS) survey team.

04/24-28/2000 - Sampling event conduced by TNRCC SAMS team at the LRA site.

02/2001 - TNRCC SAMS team issued final report (two volumes) titled AScreening Site Inspection Report LRA, Inc. Longview Gregg county . This report documented groundwater and soil contamination at the LRA site.

06/25-28/2001 - EPA conducts a Federal removal action in response to leaking containers at the LRA site.

09/21/2001 - The Texas Attorney General=s Office, representing the TCEQ, files an unsecured claim with the USBCEDT for the unpaid $88,000 penalty agreed to by LRA in the AO.

04/05/2002 - The LRA Chapter 11 Bankruptcy case was dismissed by the USBCEDT.

03/28/2005 - Investigator Dale Vodak of the TCEQ Region 5 Tyler Office received a call from Gregg County Precinct #2 Commissioner Darryl Primo=s Office seeking information pertaining to the closed LRA refinery.

04/14/2005 - First day of IHW CSE - On-site Followup Investigation (OSFU) at the LRA site.

04/22/2005 - 2nd day of IHW CSE - OSFU at LRA site.

04/25/2005 - 3rd day of IHW CSE -OSFU at the LRA site.

05/05/2005 - Gregg County Judge Bill Stoudt notified the TCEQ Region 5 Tyler in writing that Gregg County will be securing the LRA site and increasing police patrols of the area.

05/26/2005 - Call from Mike Bills, Gregg County Engineer, confirming that the new fence is up, the holes in the perimeter fence have been repaired, and Gregg County locks have been placed on the gates.

04/14, 22 & 25/2005 - TCEQ Region 5 Tyler staff conducted an IHW CSE - Onsite Followup Investigation at the LRA refinery.

05/2, 3, 4, 5, 8 & 11/2006 - TCEQ Region 5 Tyler staff conducted an IHW CSE - Onsite Followup Investigation at the LRA refinery.

ADDITIONAL INFORMATION

During the LRA bankruptcy proceedings, the three local governmental taxing entities: Gregg County, Pine Tree Independent School District (ISD), and the City of Longview, jointly acquired the LRA property in lieu of unpaid property taxes. A copy of the Gregg County Appraisal District records confirms that these entities hold title to the LRA property.

When the Gregg County Precinct #2 Commissioner=s office contacted the TCEQ Region 5 Tyler on 03/28/2005, they were seeking information about the LRA facility. A group of investors had approached the Gregg County Commissioners Court (GCCC) with a proposal to re-develop the property and/or re-open the old refinery. The investigator confirmed that the LRA site had been under formal enforcement by the TCEQ (former TNRCC) since early 1992.

Initially, the Region had some concerns that these entities might have become responsible parties by acquiring the property. However, in the Texas Health & Safety Code, '361.271(b), there is an exclusion from responsibility for solid wastes associated a property acquired by a Apolitical subdivision@ (ie.: Gregg County, COL and Pine Tree ISD) through bankruptcy, tax delinquency, abandonment or other circumstances. As such, these entities have been determined as not liable for the solid wastes remaining at the LRA site.

During their 03/30/2005 meeting, the GCCC, voted to accept an option proposal for the redevelopment of the LRA property. A presentation was made by Gregg County Refining (GCR). Pine Tree ISD and the City of Longview also agreed to the option proposal. The option remains in place for a period of one year from the date of the contract execution. If GCR exercises this option within the next year, then they can either re-develop the property or attempt to re-open the refinery.

Several years ago in a similar situation, the TCEQ Region 5 Tyler experienced the re-development of the former Tucker Refinery property in Anderson County. A salvage company came in unannounced to the Tucker Refinery site and removed all of the saleable scrap metal and left all of the wastes behind. The Tucker site has ultimately ended up in State-Superfund.

AREAS OF CONCERN

During the most recent investigation EPA has done a lot to abate hazards at the site. However, several areas of concern remain.

These include:
1) Tank 20B, one of the Slop Oil Emulsion tank, is still partially full of slop oil waste, and was not addressed during the current response;
2) Damaged insulation jackets at various locations inside the plant could result in Toxic Substance Control Act (TSCA) regulated contaminants being released to the atmosphere. Previously LRA listed asbestos waste on its Notice of Registration, so some of the insulation must contain asbestos;
3)Soil and groundwater releases on-site have not been fully assessed or evaluated;
4)Abandoned RCRA regulated units including wastewater ponds, API separators, waste tanks, and container storage areas have not undergone closure;
5)Continued leakage of oily wastes will be occurring as the seals and piping in the various units on-site continue to degrade; and
6)Break-ins by vandals and thieves will continue at the site until such time as the site is either under new management or is demolished.

These releases and the threatened releases are part of the ongoing violation of 30 TAC 335.4 - General Prohibition on Pollution. The unregistered units and wastes at the site are part of the ongoing violation of 30 TAC 335.6 - Notification Requirements. Both of these violations were covered in the 04/15/1995 Agreed Order.

CONCLUSION

With the dissolution of LRA through bankruptcy, there is currently no party responsible for the wastes at the site. The Region would like to request that the site be re-evaluated for State or Federal Superfund action. Continued break-ins and weathering will result in further degradation of the site. This will result in continued releases which could significantly impact the surrounding community.

If there are any questions regarding this investigation please feel free to contact Mr. Dale Vodak, Environmental Investigator, for the TCEQ Region 5 Tyler Office.

No Violations Associated to this Investigation

Signed Dale Vodak
Environmental Investigator

Date 06/29/06

Signed [illegible]
Supervisor

Date 7-3-06

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)

___Letter to Facility (specify type) : _____

Investigation Report

___Sample Analysis Results

___Manifests

___NOR

✓ Maps, Plans, Sketches Attachment #1

✓ Photographs

___Correspondence from the facility

✓ Other (specify) :

Attachment #2 Phone Memo

Attachment #3 - EPA PO/REP

TEXAS COMMISSION
ON
ENVIRONMENTAL QUALITY

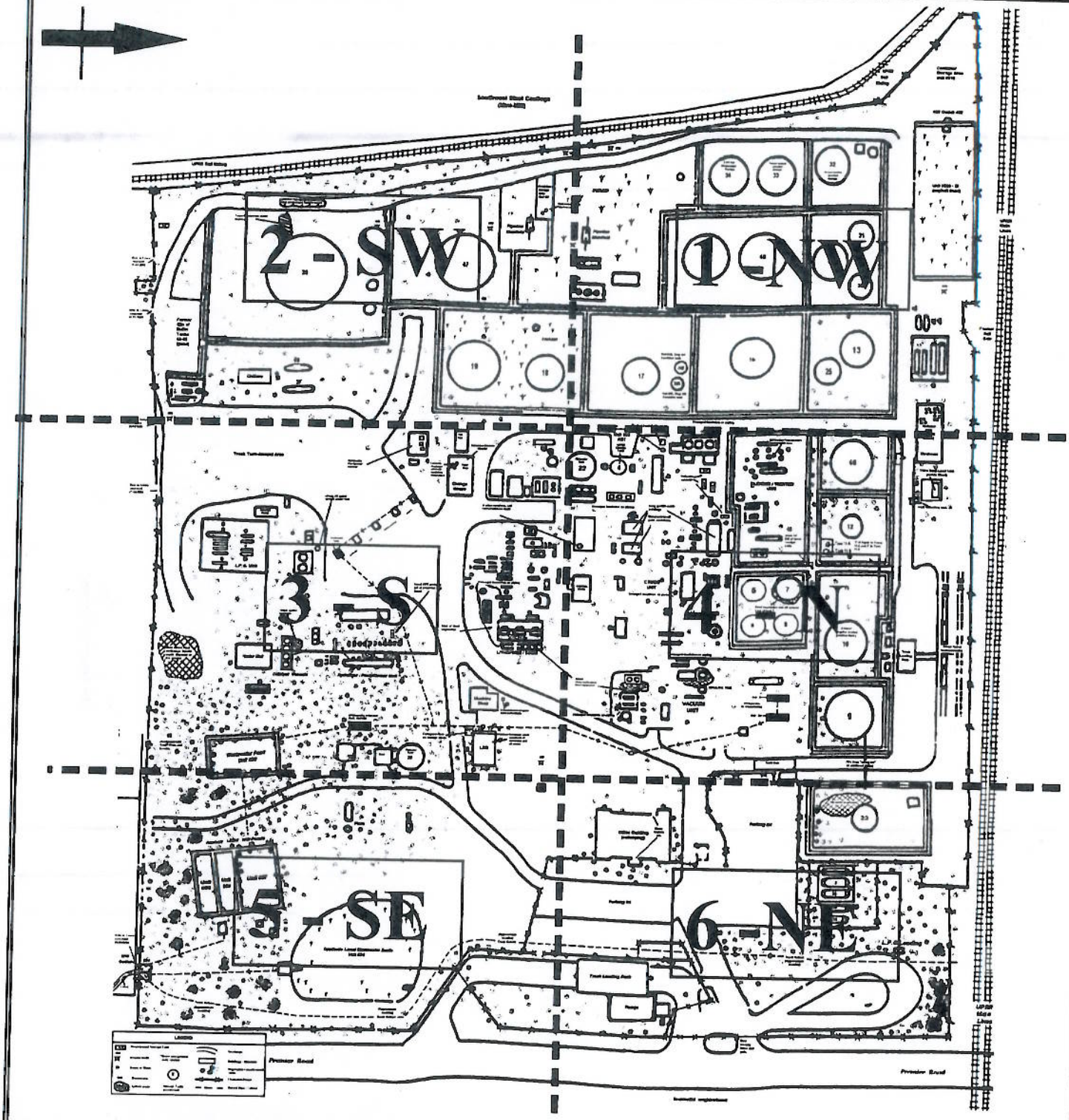
TCEQ

ATTACHMENT #1

Incident No. Investigation No.	N/A 464432	Facility Name:	Longview Refining Associates	County Name:	Gregg
Investigation Date(s):	05/2,3,4,5,8 7& 11/2006	TCEQ Investigator:	Dale Vodak (Lead), Tom Erny and Colleen Fleming		

Site Diagrams

OFFICIAL TCEQ DOCUMENT



Description: Abandoned Refinery - Overall Site Map, with map sections of site noted.

*** NOT TO SCALE***

Facility Name: Longview Refining Associates

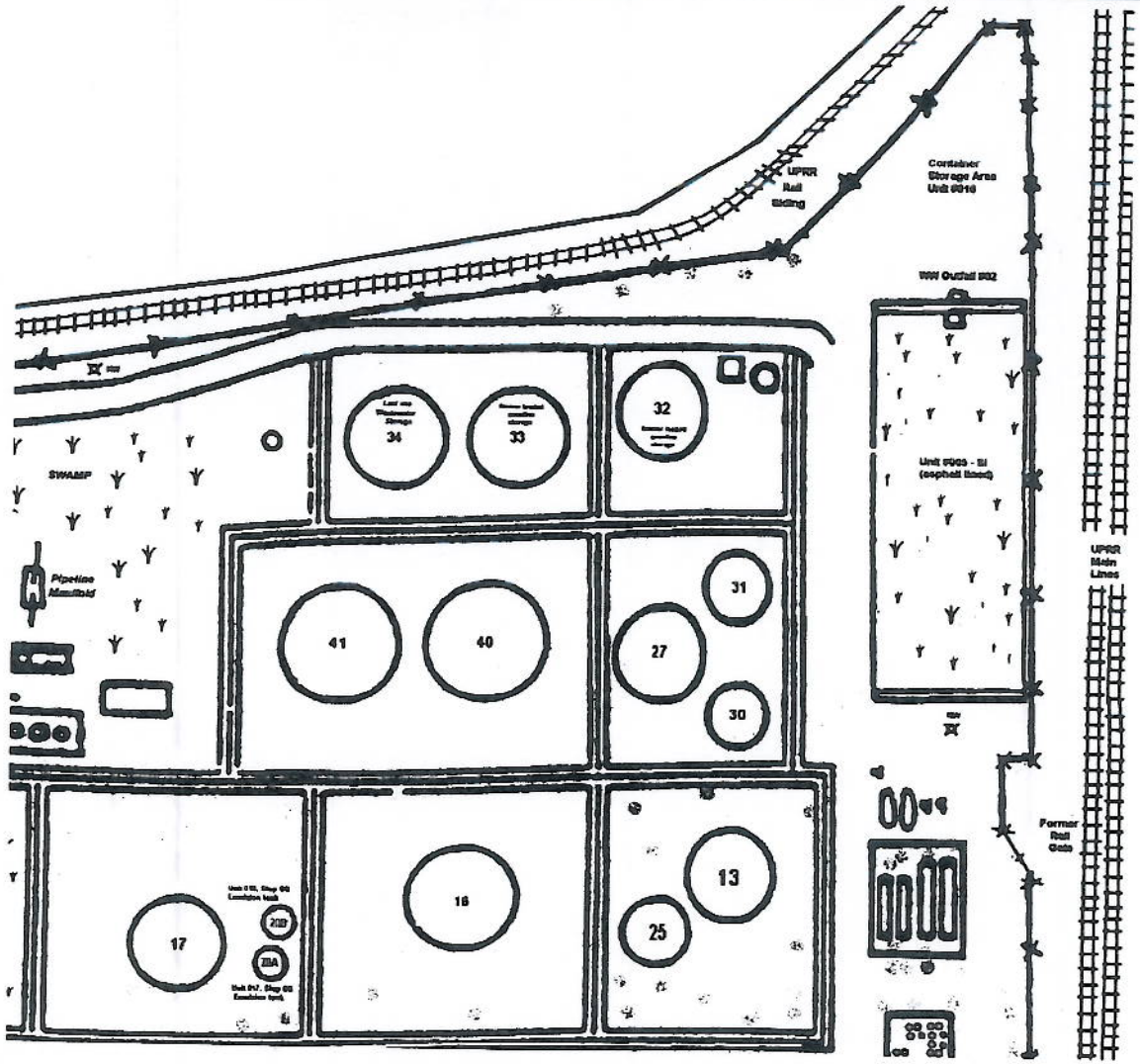
City, County: 601 Premier Road, Longview, Gregg County

Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

OFFICIAL TCEQ DOCUMENT

North

1-NW



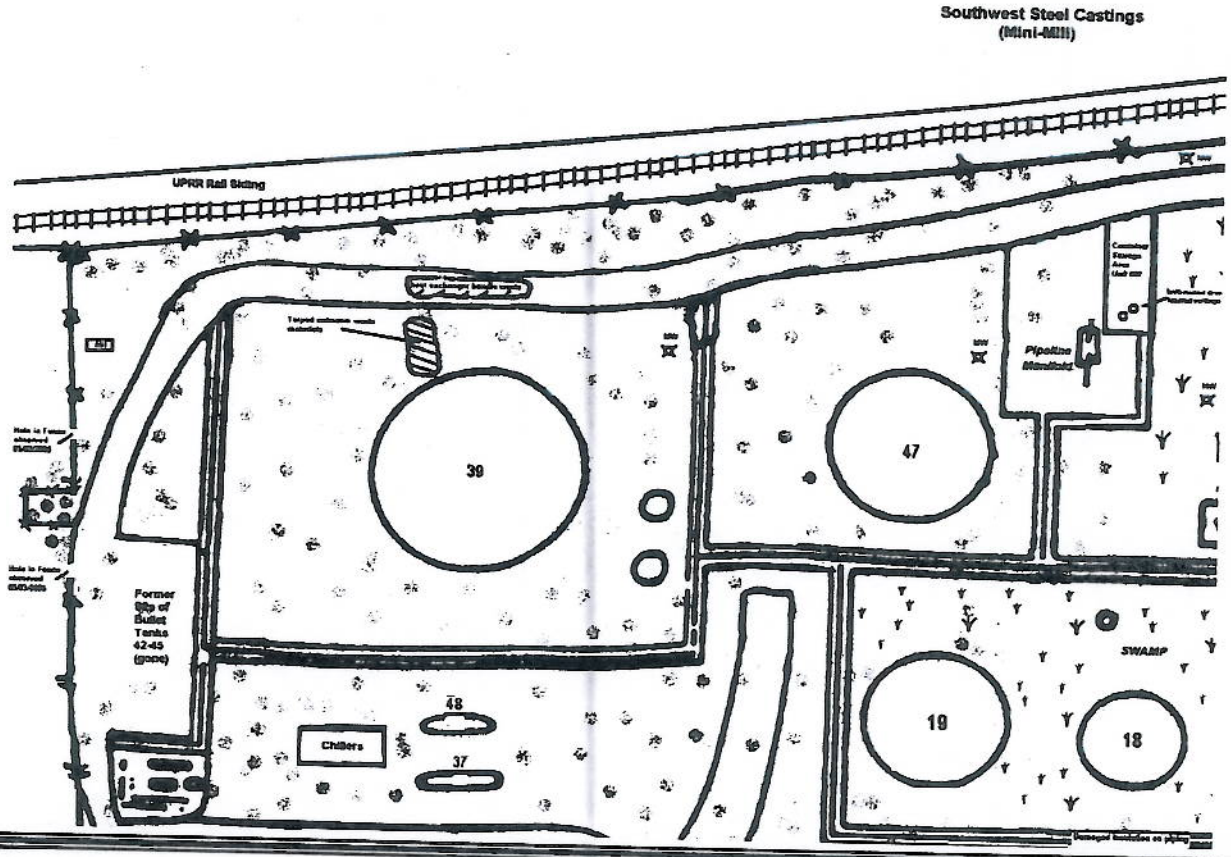
Description: Abandoned Refinery - Site Map - Section 1 NW

* NOT TO SCALE*

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

North

2 - SW

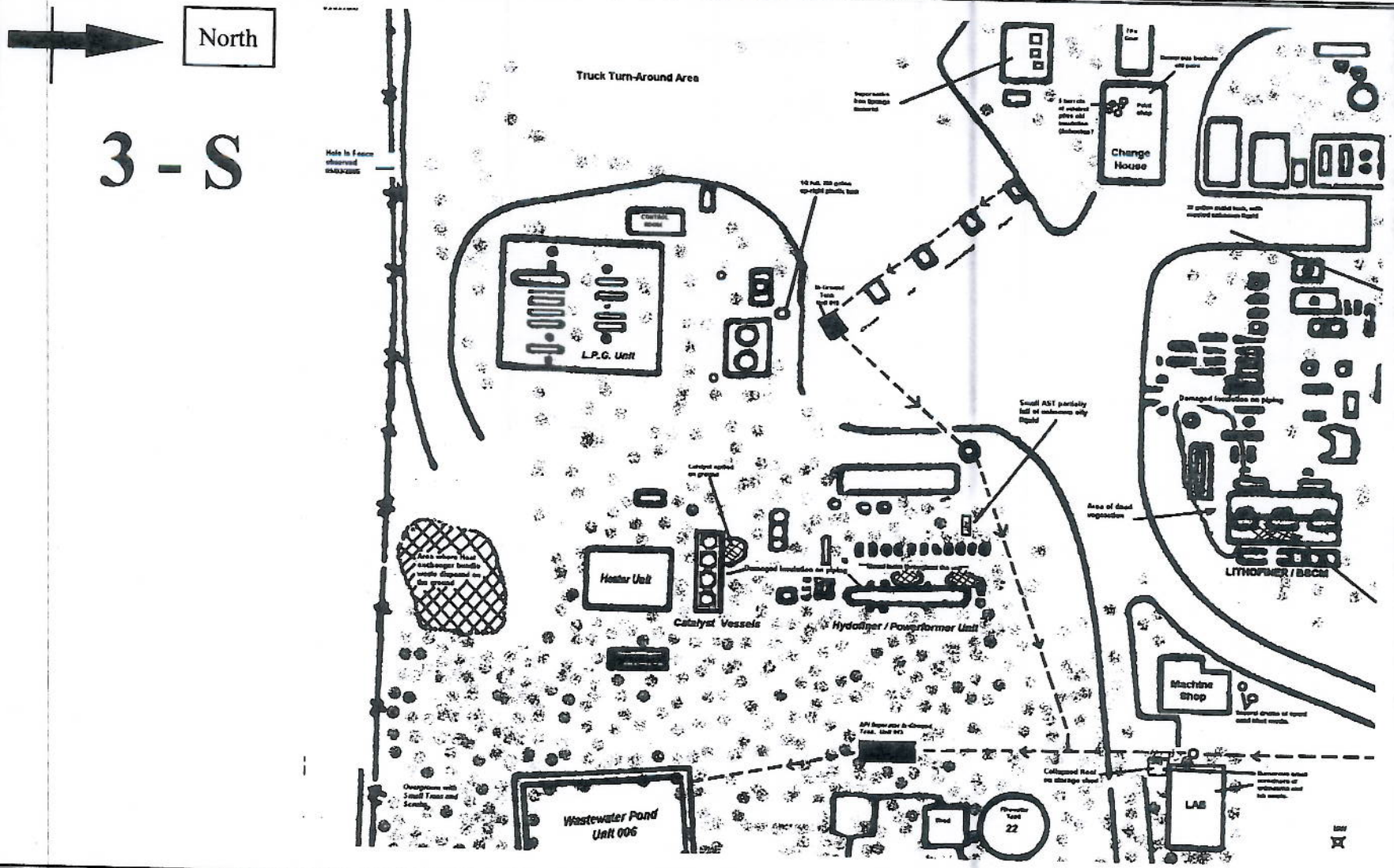


Description: Abandoned Refinery - Site Map - Section 2 SW

* NOT TO SCALE*

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

OFFICIAL TCEQ DOCUMENT

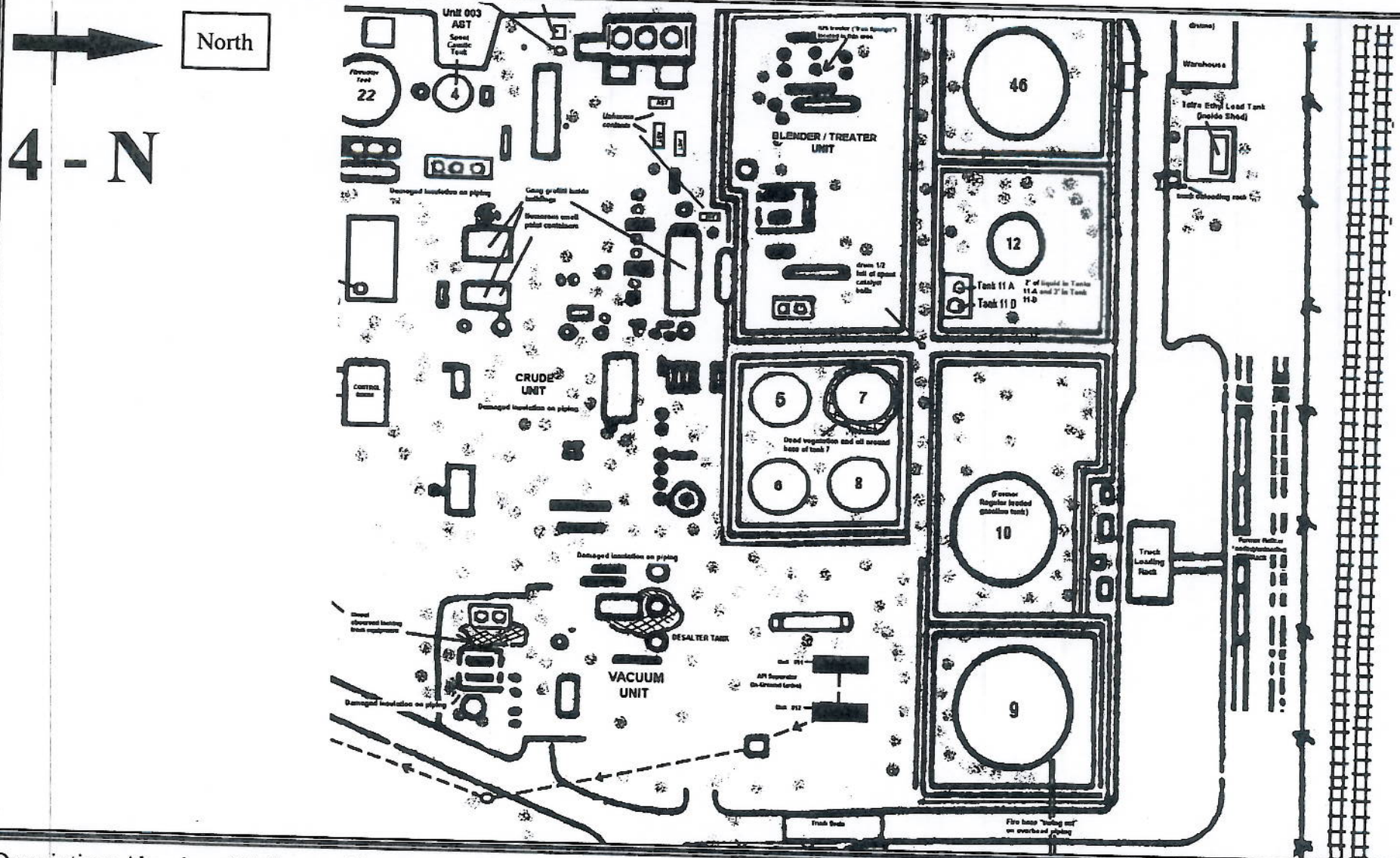


Description: Abandoned Refinery - Site Map - Section 3- S

* NOT TO SCALE*

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

OFFICIAL TCEQ DOCUMENT

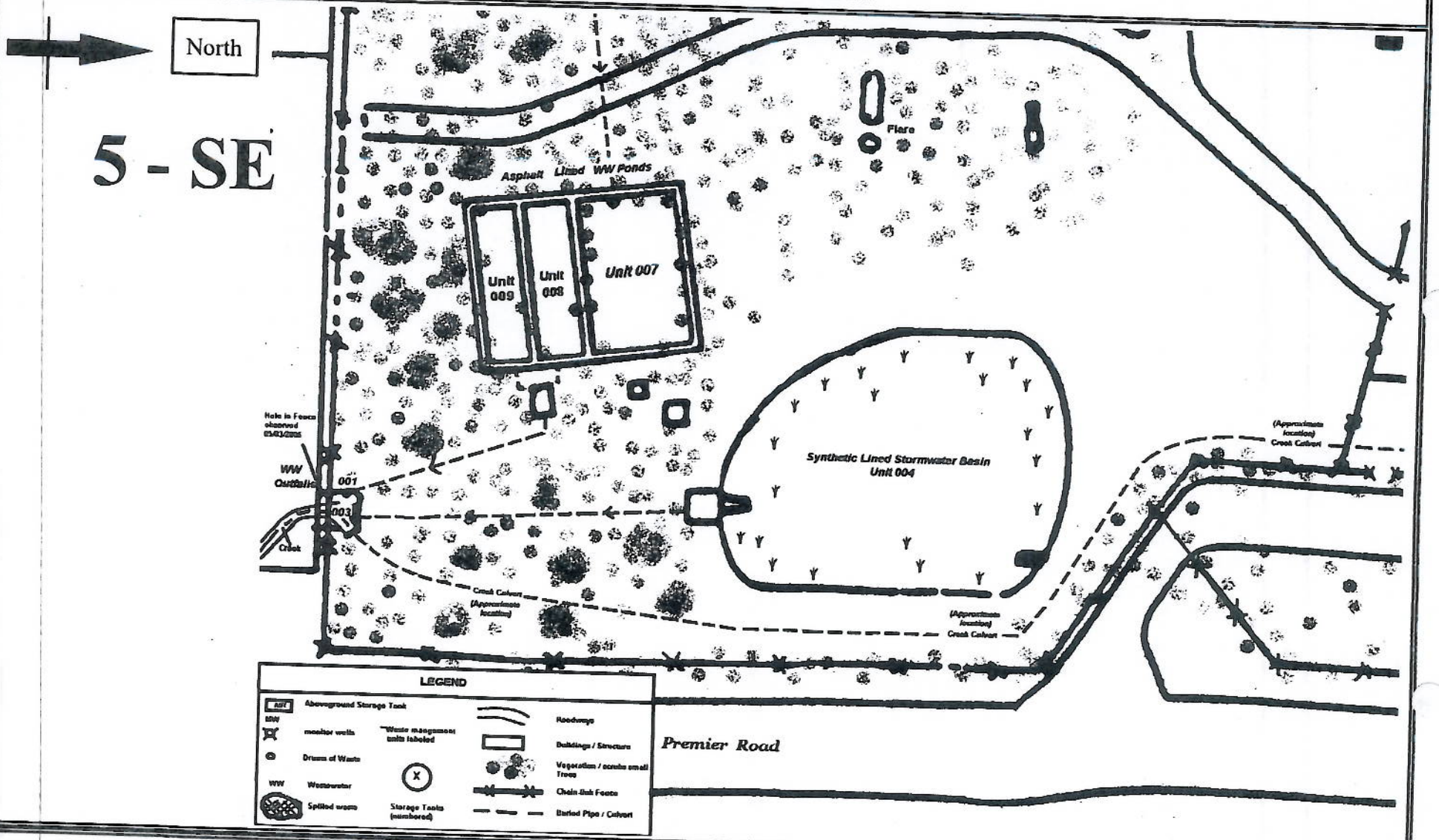


Description: Abandoned Refinery - Site Map - Section 4 -N

* NOT TO SCALE*

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

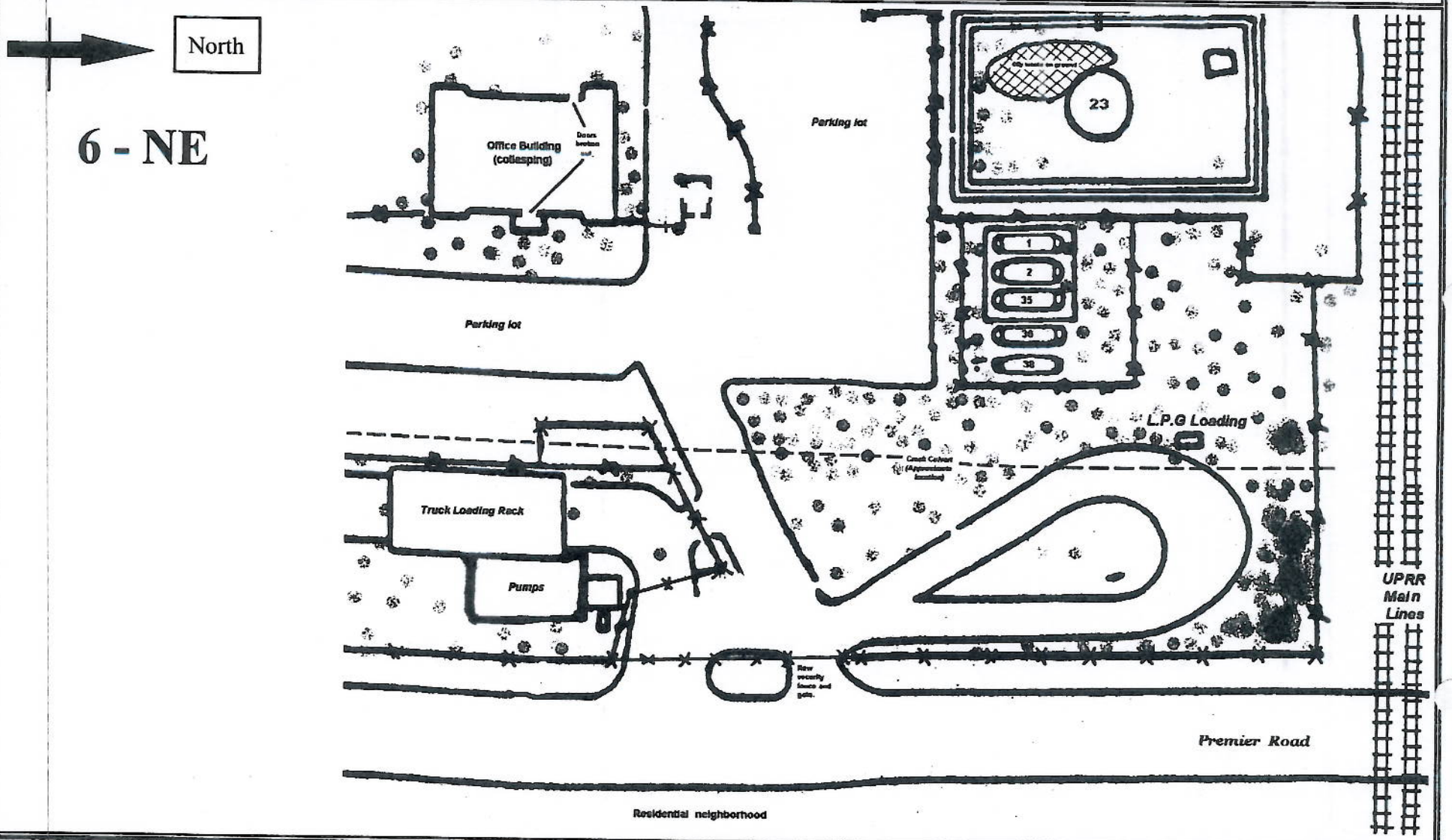
OFFICIAL TCEQ DOCUMENT



Description: Abandoned Refinery - Site Map - Section 5- SE

* NOT TO SCALE*

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006



Description: Abandoned Refinery - Site Map - Section 6 NE

*** NOT TO SCALE***

Facility Name: Longview Refining Associates
City, County: 601 Premier Road, Longview, Gregg County
Investigator(s): Dale Vodak, Tom Erny, Colleen Fleming Investigation on 05/02,03,04,05 & 08/2006

TEXAS COMMISSION
ON
ENVIRONMENTAL QUALITY

TCEQ

ATTACHMENT #2

Incident No. **Investigation No.**	**N/A** **464432**	**Facility Name:**	**Longview Refining Associates**	**County Name:**	**Gregg**
Investigation Date(s):	**05/2,3,4,5,8 7& 11/2006**	**TCEQ Investigator:**	**Dale Vodak (Lead), Tom Erny and Colleen Fleming**		

Phone Memos

Texas Commission on Environmental Quality

TELEPHONE MEMO TO THE FILE

Please complete with typewriter or black pen

Call to: Commissioner Primo's - (Sec Reatha)

Call from: Dale Vodak

Date of Call: 06/28/06

File no.: INV. No. 464432

Phone no.: 903/759-3611

Subject: Longview Refining Associates

Information for file: No update on LRA, regarding the takeover of the site by Gregg County Refining. Will check w/ Commissioner Primo to find out if he's aware of any contact.

Expect a callback tomorrow or Friday (06/29-30/06).

Signed: Dale Vodak

TEXAS COMMISSION
ON
ENVIRONMENTAL QUALITY

TCEQ

ATTACHMENT #3

Incident No. **Investigation No.**	**N/A** **464432**	**Facility Name:**	**Longview Refining Associates**	**County Name:**	**Gregg**
Investigation Date(s):	**05/2,3,4,5,8 7& 11/2006**	**TCEQ Investigator:**	**Dale Vodak (Lead), Tom Erny and Colleen Fleming**		

EPA Region 6
Longview Refining Associates
POLREP #1 - Initiation of Action

All POLREPs for this site

Longview Refinery

Longview , TX - EPA Region VI
POLREP #1 - Initiation of Action

Printer Friendly

On-Scene Coordinator - Pat Hammack

Emergency

Start Date: 5/3/2006

Pollution Report (POLREP)

Site Description

The site is an abandoned oil refinery. The facility closed down operation in 1992 leaving all materials in plac site. In 2002, the EPA conducted a Removal Action to address some leaking oil from a storage tank and to (approximately 10 leaking drums of hazardous materials. The site has had a security problem since it was abandoned. Individuals have entered the site and stolen copper wiring from the facility. It is obvious from gr teenagers have entered the site and broken some of the glass containers in the laboratory releasing the con

The EPA was contacted by the State to conduct an assessment to determine the potential need for a remov action. During the assessment numerous containers were leaking or broken. The condition of the site requi Classic Emergency Response to be started.

Te removal will address approximately 50 drums and numerous other container of hazardous materials, the laboratory, and site security by repairing the boundary fence.

Current Activities

Activated the ERRS contractor and mobilized to site. Continuing the site assessment with the START contr

Planned Removal Actions

Stage, HAZCAT, sample and overpack leaking and damaged drums.
Repair Site boundary fence.
Remove and clean up spilled mercury.
Lab Pack containers from site laboratory.
Dispose of collected materials
Demob

Next Steps

Mob to site.
Start securing drums and containers.

Key Issues

N/A

United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Wednesday, May 10, 2006
From: Pat Hammack, On-Scene Coordinator

To: Debbie Dietrich, Office of Emergency Management
Ragan Broyles, Response and Prevention Branch

Subject: Assessment and staging complete
Longview Refinery
601 Premier Road, Longview, TX
Latitude: 32.5014
Longitude: -94.8081

POLREP No.:	2	**Site #:**	LR
Reporting Period:		**D.O. #:**	
Start Date:	5/3/2006	**Response Authority:**	CERCLA
Mob Date:	5/3/2006	**Response Type:**	Emergency
Completion Date:		**NPL Status:**	Non NPL
CERCLIS ID #:	TX0000605384	**Incident Category:**	Removal Action
RCRIS ID #:		**Contract #**	

Site Description
The site is an abandoned oil refinery. The facility closed down operation in 1992 leaving all materials in place on site. In 2002, the EPA conducted a Removal Action to address some leaking oil from a storage tank and to overpack approximately 10 leaking drums of hazardous materials. The site has had a security problem since it was abandoned. Individuals have entered the site and stolen copper wiring from the facility. It is obvious from grafitti that teenagers have entered the site and broken some of the glass containers in the laboratory releasing the contents.

The EPA was contacted by the State to conduct an assessment to determine the potential need for a removal action. During the assessment numerous containers were leaking or broken. The condition of the site required the Classic Emergency Response to be started.

Te removal will address approximately 50 drums and numerous other container of hazardous materials, the laboratory, and site security by repairing the boundary fence.

Current Activities
The assessment at the site was completed on Saturday, May 6, 2006. Approximately 200 drums were exaimined for hazardous materials. All tanks on site were inspected and the ones containing hazardous materials were emptied and prepared for disposal. Materials were transfered from deteriorating drums into D.O.T. approved shipping containers and staged in numerous waste stream categories for disposal. The laboratory hazardous contents were "lab-packed" and staged for disposal. The ERRS crew was demobilized from this phase of work on May 10, 2006 and will return for the disposal phase in June. The site fence was repaired , but is cut on a daily basis.

Planned Removal Actions

Stage, HAZCAT, sample and overpack leaking and damaged drums.
Repair Site boundary fence.
Remove and clean up spilled mercury.
Lab Pack containers from site laboratory.
Dispose of collected materials
Demob

Next Steps

Arrange for the diaposal of approximately 100 drums and pallets of smaller containers of hazardous waste. To remove and dispose approximately 5000 gallons from a leaking storage tank that was temporairly repaired.

Key Issues

The ownership of the property may change before June. New access may have to be granted.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$185,000.00	$25,000.00	$160,000.00	86.49%
RST/START	$15,000.00	$6,000.00	$9,000.00	60.00%
Intramural Costs				
Total Site Costs	$200,000.00	$31,000.00	$169,000.00	84.50%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

epaosc.org/LongviewRefining

TEXAS COMMISSION
ON
ENVIRONMENTAL QUALITY

TCEQ

Photos #1 - #47

Incident No. **Investigation No.**	**N/A** **464432**	**Facility Name:**	**Longview Refining Associates**	**County Name:**	**Gregg**
Investigation Date(s):	**05/2,3,4,5,8 7& 11/2006**	**TCEQ Investigator:**	**Dale Vodak (Lead), Tom Erny and Colleen Fleming**		

Photo #1 shows a view inside the plant warehouse at the closed Longview refining plant. From left to right in the photo are: Pat Hammack, EPA OSC; Thomas Walzer, EPA START Contractor; and Mark Hayes, EPA OSC. Open drums and packages can be seen in the photo. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #2 shows a closer view of the barrels and boxes of wastes stored in the warehouse. A pallet of five gallon buckets of waste can be seen at the rear of the photo. two barrels in the center of the photo had labels indicating they contained perchloroethylene.

This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

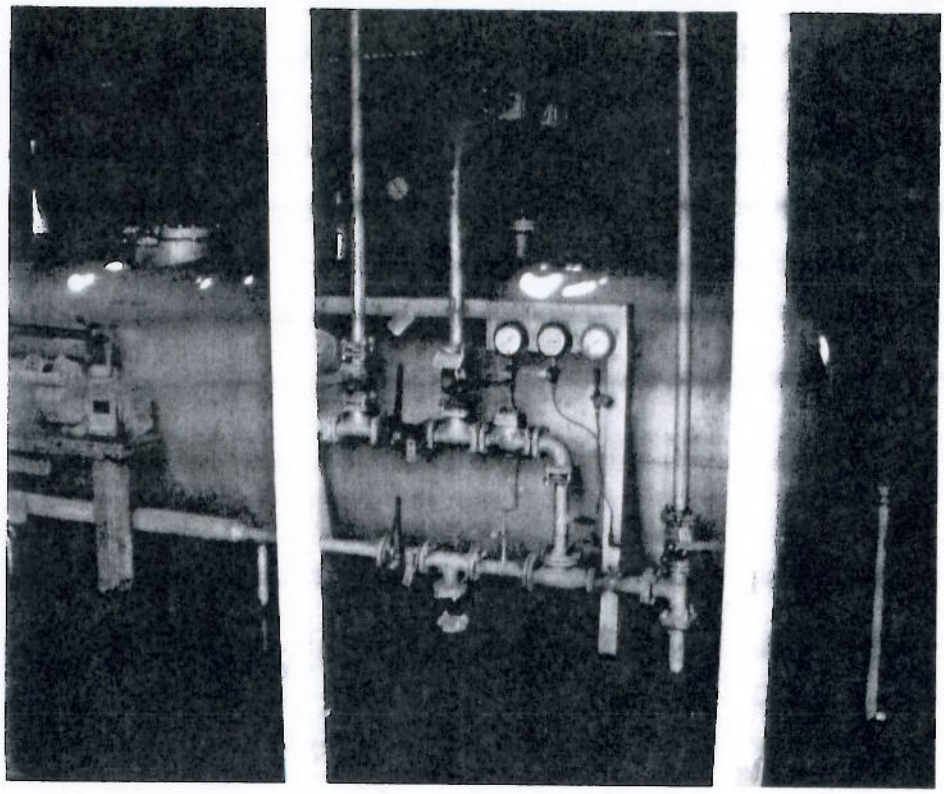


Photo #3 shows a view inside the tetra-ethyl lead tank house at the closed Longview refining plant. The tetra-ethyl lead tank is visible in the center of the photo. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #4 shows a view of the bags of iron sponge media found stored in an open shed. This shed is located on the south side of the Plant Changehouse. Several small, empty barrels can be seen at the rear of the photo.

This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #5 shows a view inside the paint shop located in the westend of the Plant Changehouse at the abandoned Longview refining plant. Small bottles, 5 gallon buckets and one 55-gallon drum of waste and laboratory glassware are visible in the photo. The bottles and buckets contained chemicals and paints. The drum placard stated it contained catalyst. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

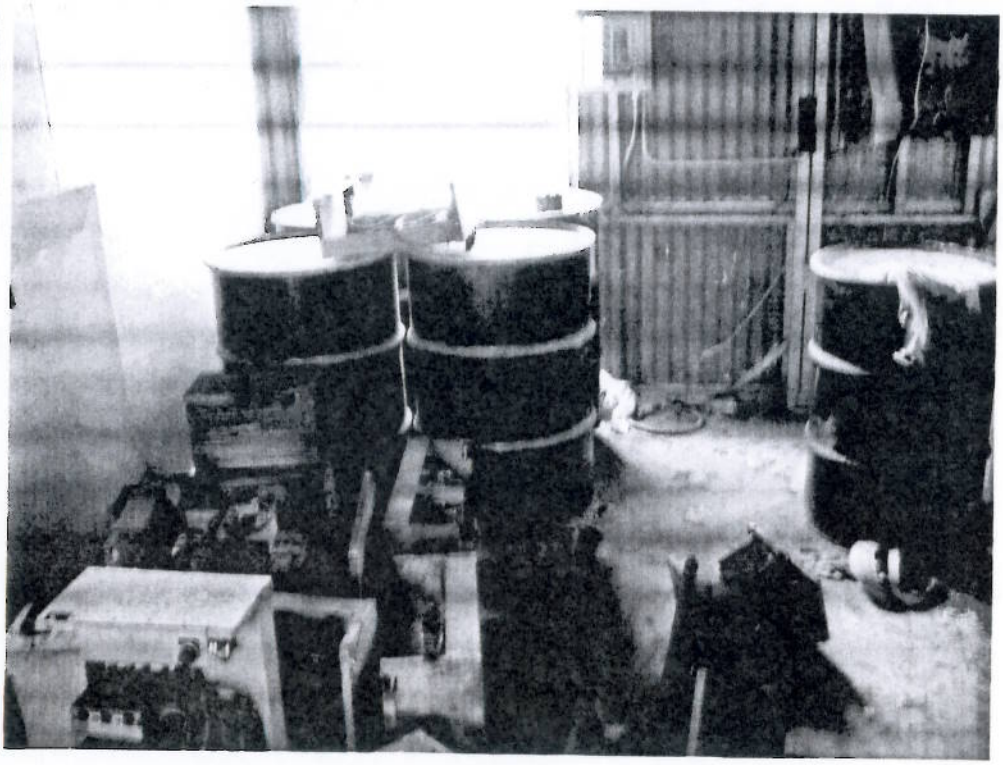


Photo #6 shows another view of the remaining drums waste catalyst stored inside the paint shop on the west end of the Plant Changehouse building.

This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #7 shows a view inside the collapsed shed, adjacent to the Plant Lab at the abandoned Longview Refining Associates plant. Bottles and buckets of unknown chemical waste are visible in the photo. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

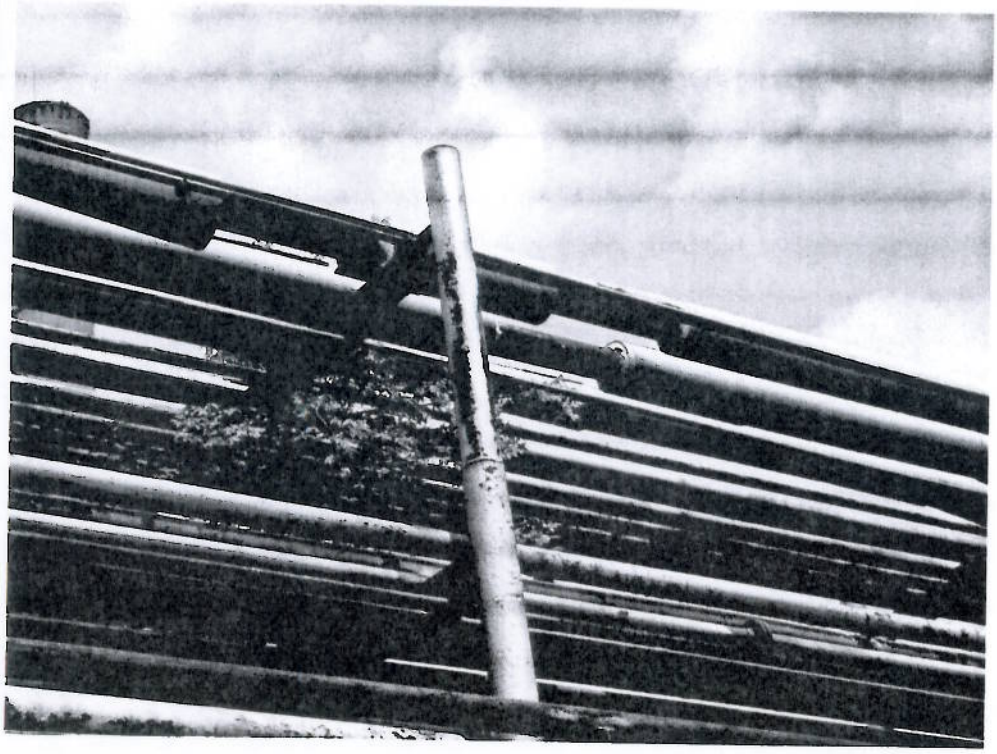


Photo #8 shows a view of some of places where insulation has fallen off of steam lines and piping inside the abandoned Longview Refining Associates plant. NOTE: The plant waste inventory lists: "asbestos insulation", as one of the waste streams.

This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #9 shows a view of a diesel leak from a piece of equipment in the Crude Unit at the Longview Refining Associates plant unit . Personnel visible in the photo from left to right are: Derrick Cobb, EPA START team and Mark Hayes, EPA OSC. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

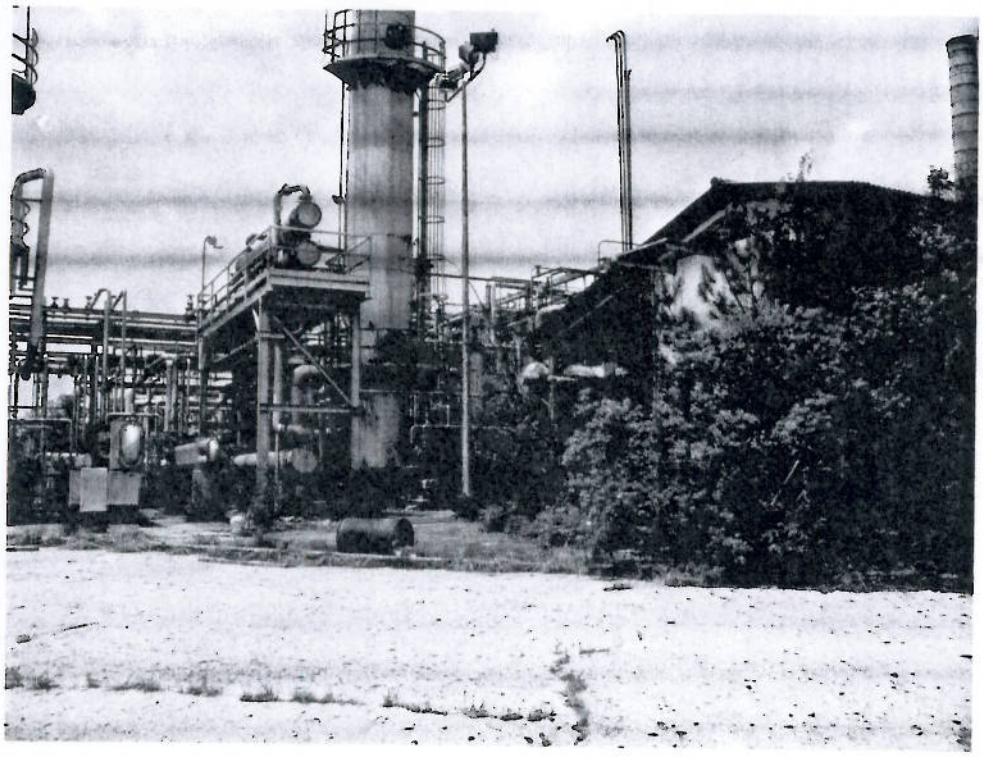


Photo #10 shows a view west across some of the dead vegetation observed inside the Lithofiner/BSCM Unit at the abandoned Longview Refining Associates plant. The presence of dead vegetation in this area indicates the potential for a subterranean leak or spill.

This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

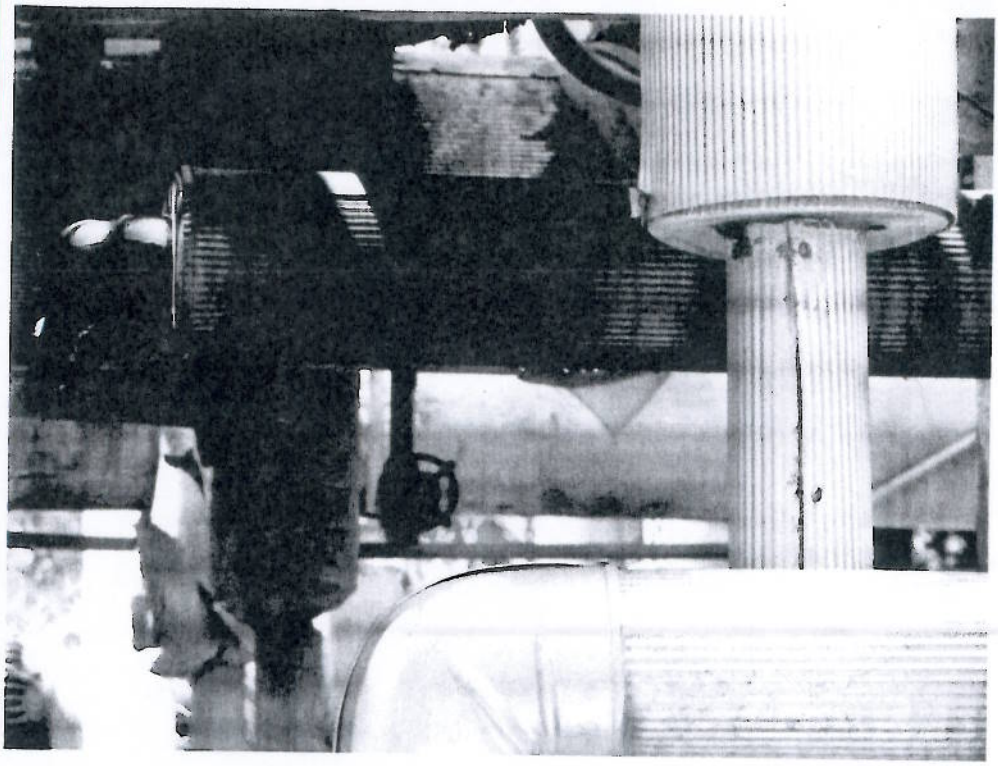


Photo #11 shows a view of a diesel leak from a piece of equipment in the Hydrofiner/Powerformer Unit at the Longview Refining Associates plant. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #12 shows a view of a 200 gallon tank stored adjacent to the cooling tower, located adjacent in area of the Blender/Treater Unit at the abandoned Longview Refining Associates plant. This tank contains 100 gallons of liquid sulfuric acid waste. This photo was taken on 05/02/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

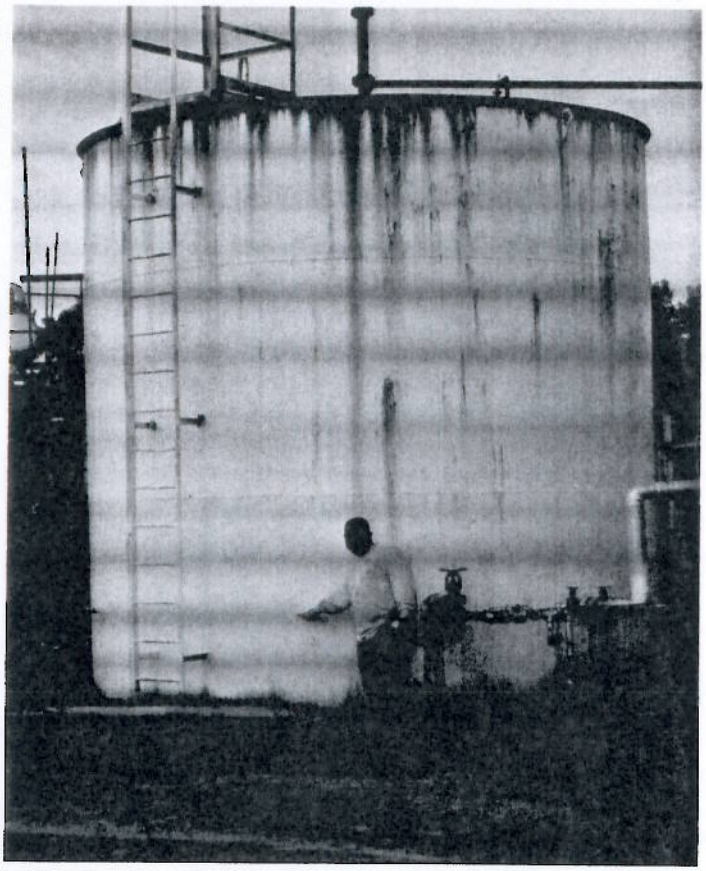
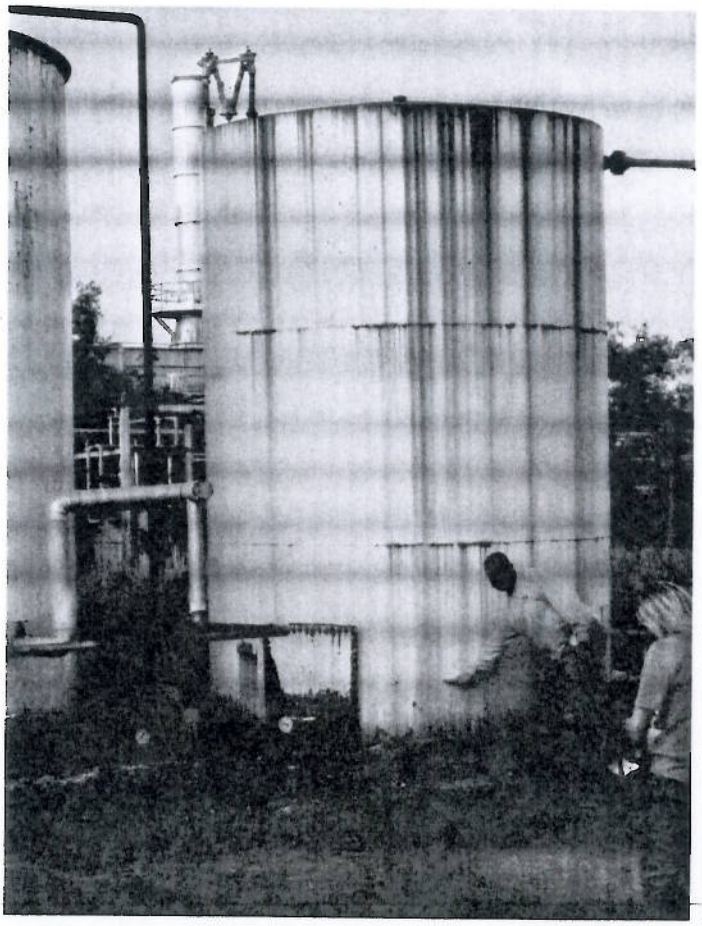
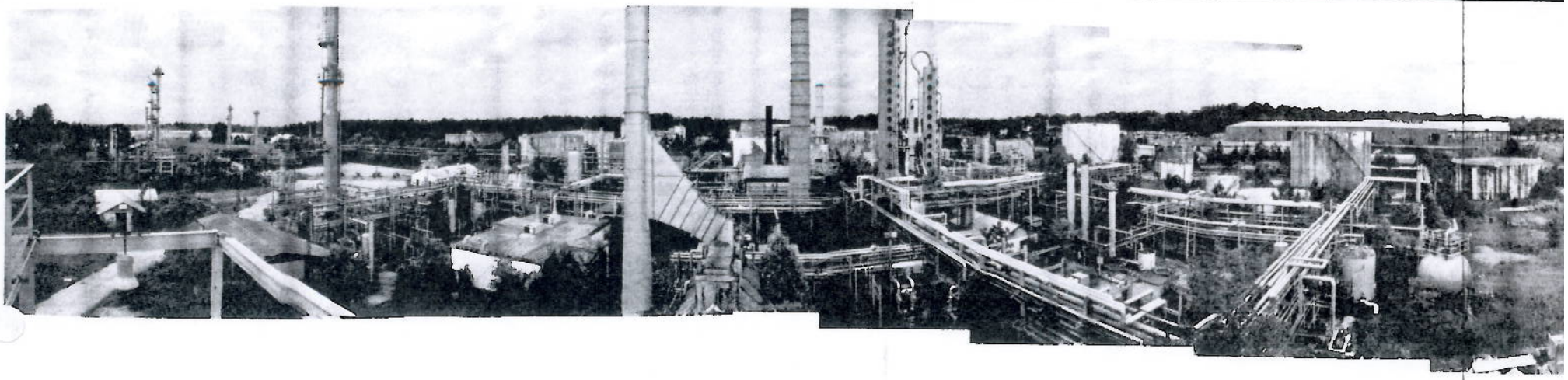


Photo #13 shows a view of a Tank 11-B at the Longview Refining Associates plant. On 05/03/2006, this tank still contains 3 feet of caustic waste solution (pH 14 s.u.). Mr. Billy Herbert, EPA START, can be seen standing in the photo marking the liquid level on the side of the tank. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #14 shows Tank 11A at the abandoned Longview Refining Associates plant. The tank contains approximately 2 feet of caustic waste. Mr. Billy Herbert, EPA START, can be seen standing in the photo marking the liquid level on the side of the tank. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.





S SW W NW N

Photos 15-24 comprise a montage view of the abandoned Longview Refining Associates refinery taken the top platform of the plant Crude Unit. Compass directions are noted in red bel corrosion on metal surfaces of the plant. This montage also shows how the plant has been overgrown with vegetation. The white building in the SW-W quadrant of this montage is the pl where the bulk of the wastes were discovered is in the NW quadrant of the montage, but is mostly hidden from view behind several of the large storage tanks and trees.

SE S SW

Photos 25-27 complete the panoramic view over the southern part of the abandoned refinery. Compass directions are noted below the photos. The plant lab is the small building with the photo montage. The other larger building with the white roof and green sides is the former plant maintenance shop, This building was used by EPA START as a holding waste facility ar waste HAZCAT operations were conducted in this building.

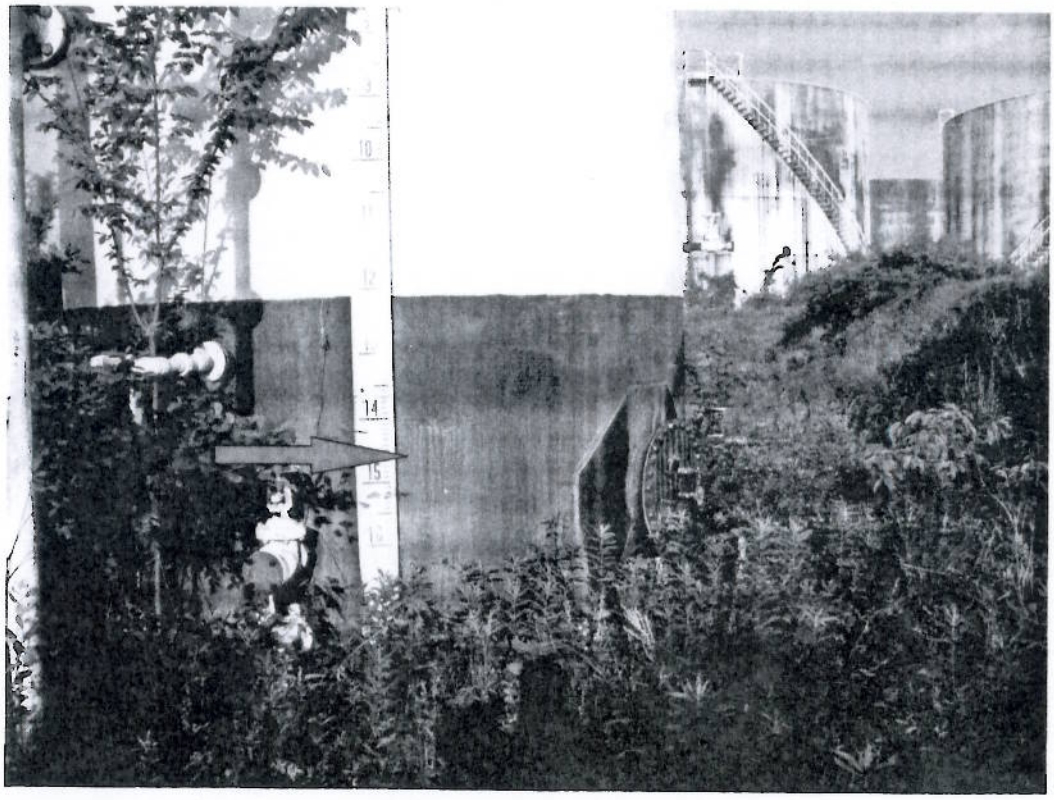
All of the photos on this page were taken by TCEQ Investigator Dale Vodak on 05/03/2006, using a Canon Power Shot A-160 digital Camera.

Photo #25 shows a view of a one half full drum of spent catalyst ball. This barrel is sitting on the firewall between Tank-7 and Tank-11B at the Longview Refining Associates plant. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #26 shows a view of the Tetra Etyl-Lead House at the abandoned Longview Refining Associates plant. The plant warehouse is located directly behind this building, and the roof is visible in the photo. The truck unloading hoses are visible at the front of the building. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #27 shows a view of tarped area inside the firewall of Tank-39 at the Longview Refining Associates Plant. This area appears to cover be a cover over a pile unknown waste material. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #28 shows a view of Tank-20B, the former plant slop oil emulsion tank at the Longview Refining Associates Plant. There was 4 feet of liquid in this tank, as measured on the gauge and with a thermal imager. The liquid level is visible on the tank, where the black paint, has faded (green arrow). This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.



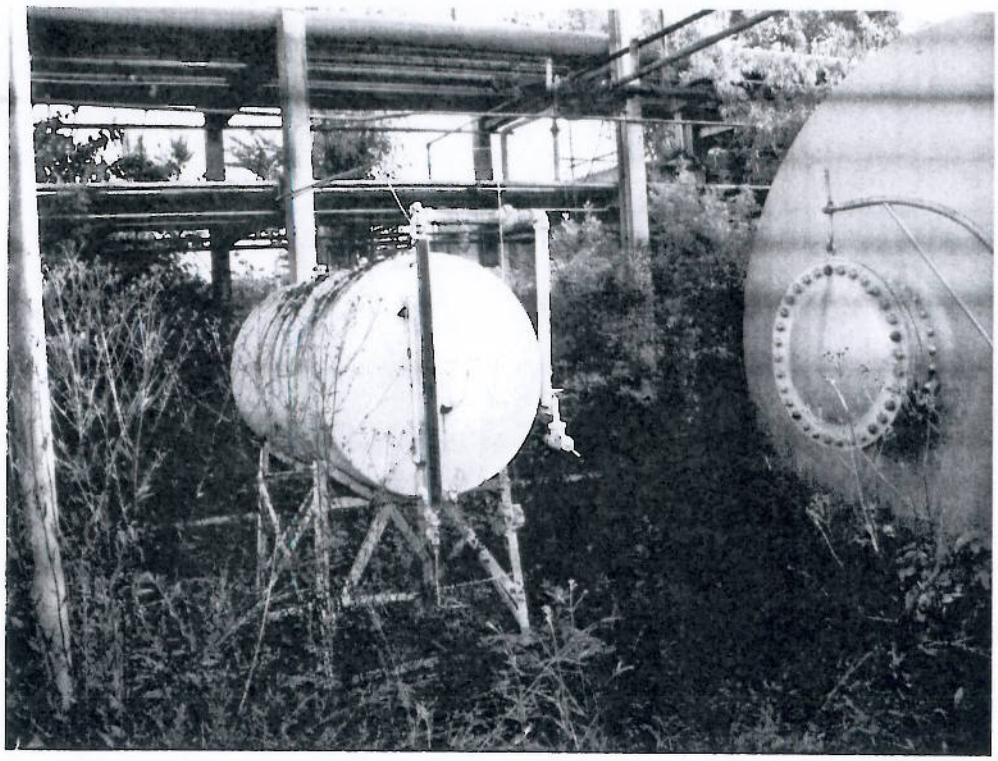


Photo #29 shows a small, white colored, skid mounted tank located in the area between the Crude Unit and the Blender/Treater Unit at the Longview Refining Associates Plant. This tank is approximately ½ full of an unknown waste liquid. The large silver tank on the right side of the photo was found to be empty. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #30 shows a view of Tank-7 at the Longview Refining Associates Plant. This tank had a ring of leaked oil (brown stain) on the ground around the base of the tank, which indicates that the bottom ring on the tank has failed due to corrosion. The vegetation around the base of the tank was stressed or dead. his photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

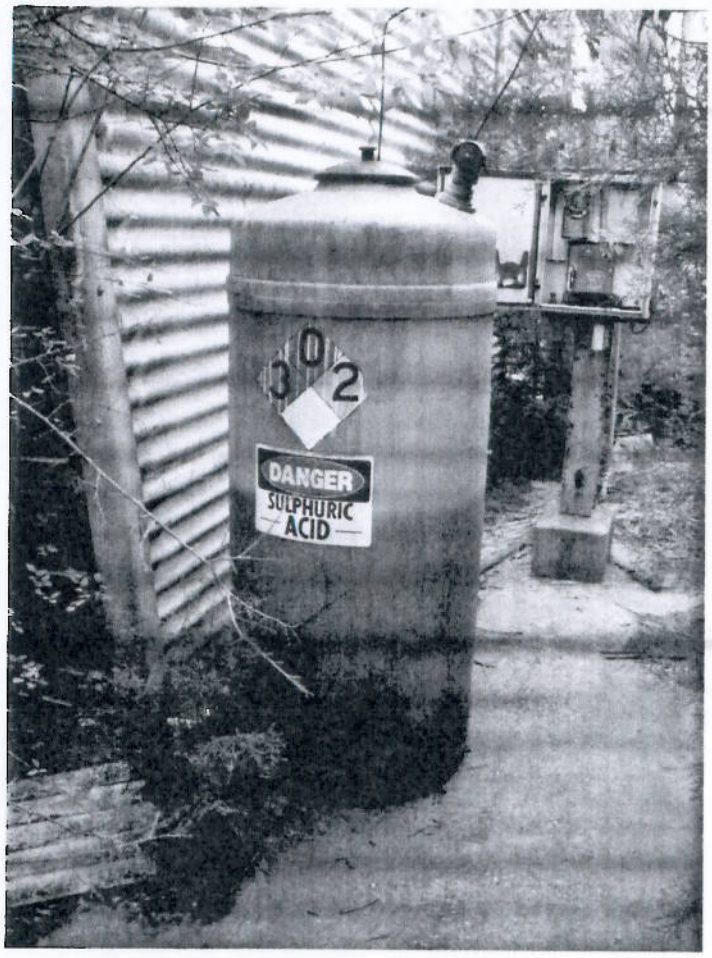
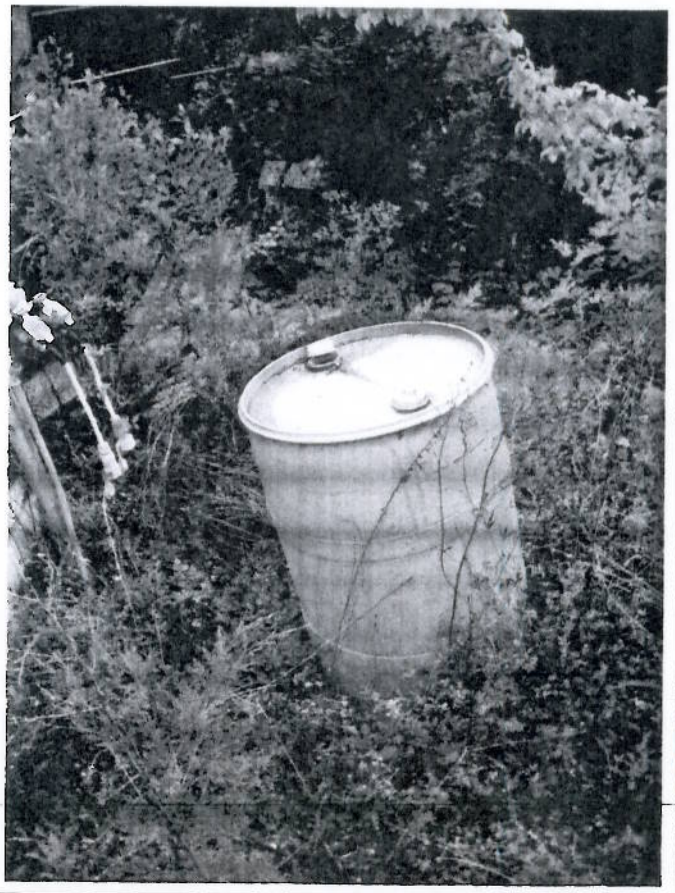


Photo #31 shows a 200 gallon sulfuric acid tank found adjacent to the cooling tower in the L.P.G. Unit at the Longview Refining Associates Plant. This tank is visibly ½ full of waste liquid. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #32 shows a view of a drum of unknown liquid found in the vicinity of the L.P.G. Unit at the Longview Refining Associates Plant. This drum is was found to be ½ full of waste liquid. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.



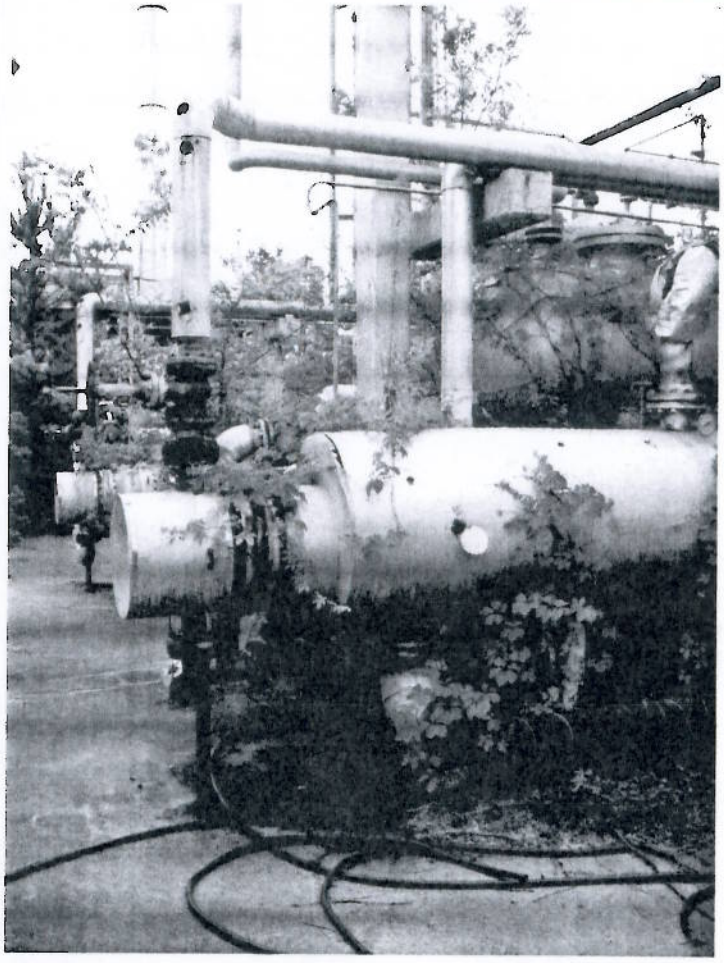
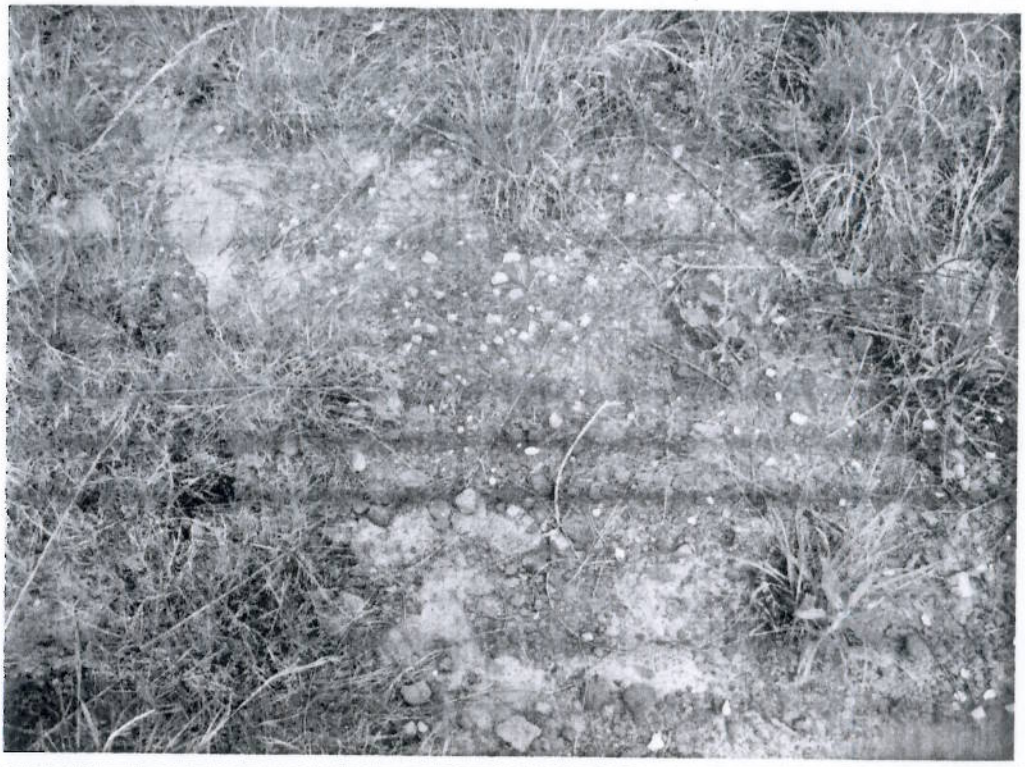


Photo #33 shows a view of a leaking heat exchanger unit located in the Hydrofiner / Powerformer Unit at the Longview Refining Associates Plant. This tank is visibly ½ full of waste liquid. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #34 shows a view of an area where heat exchange bundle waste (green-white spot pieces on is present on the ground at the rear of the Heater Unit on the south end of the Powerformer / Hydrofiner Unit at the Longview Refining Associates Plant. NOTE: This waste disposal area was first observed during the CEI investigation conducted at the site on 10/27/1992, 11/05- 06/1992. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.



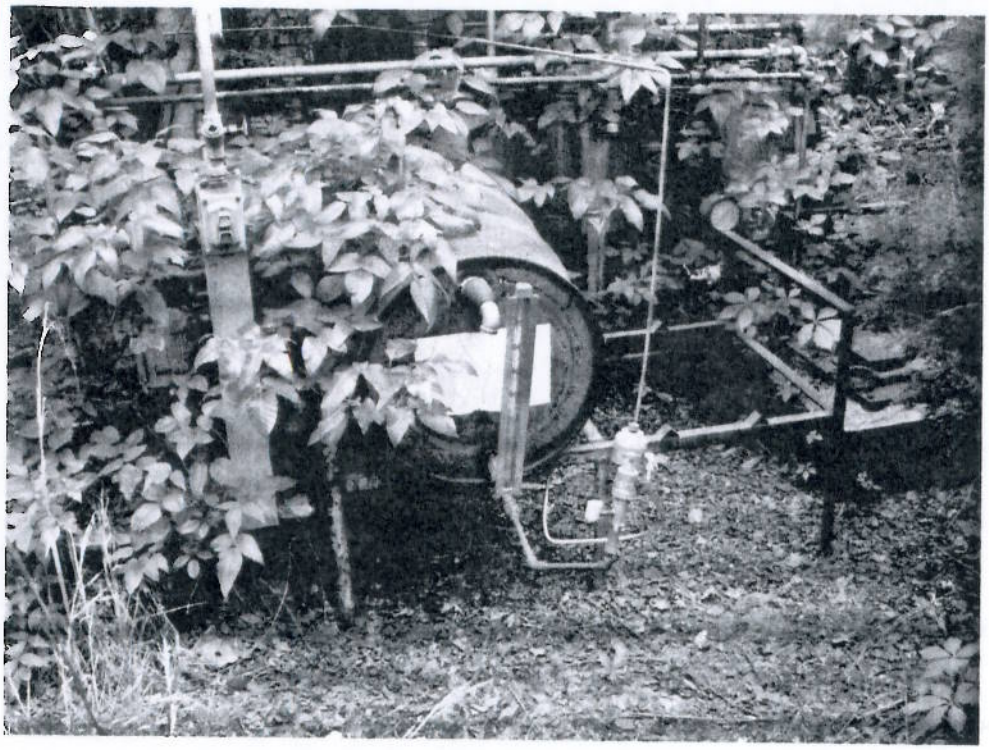


Photo #35 shows a view of a drum of an unknown waste liquid located in the Hydrofiner / Powerformer Unit at the Longview Refining Associates Plant. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

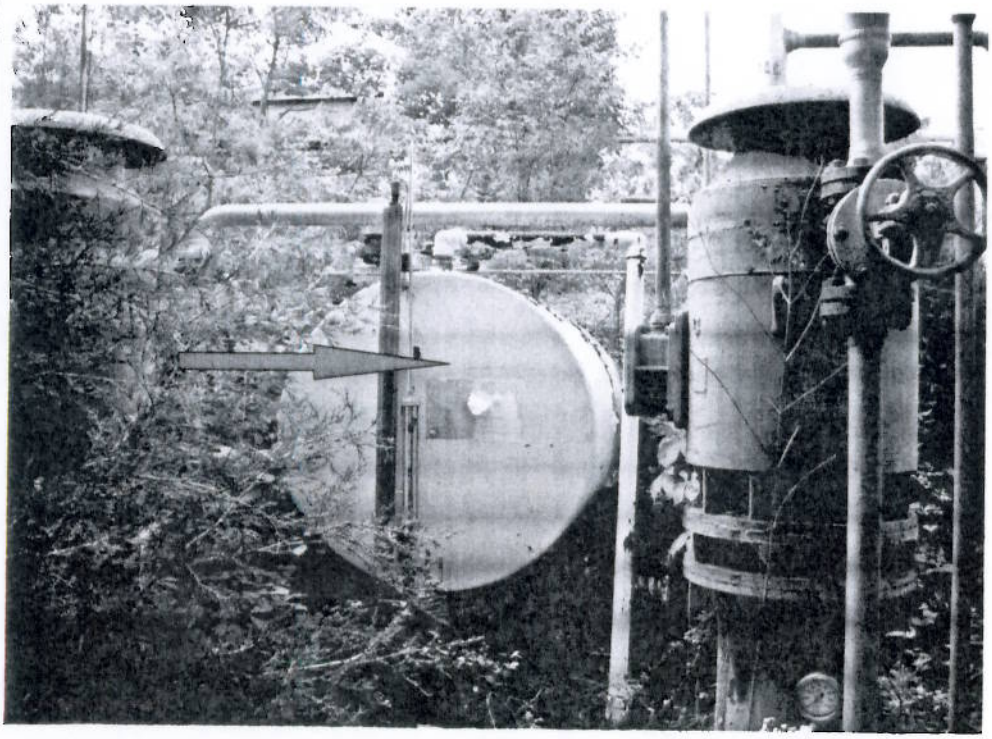


Photo #36 shows a view of a small (>500 gallon) tank in the Hydrofiner / Powerformer Unit at the Longview Refining Associates Plant. Thermal imaging of the tank found it to be 2/3 full of an unknown waste liquid (green arrow). This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

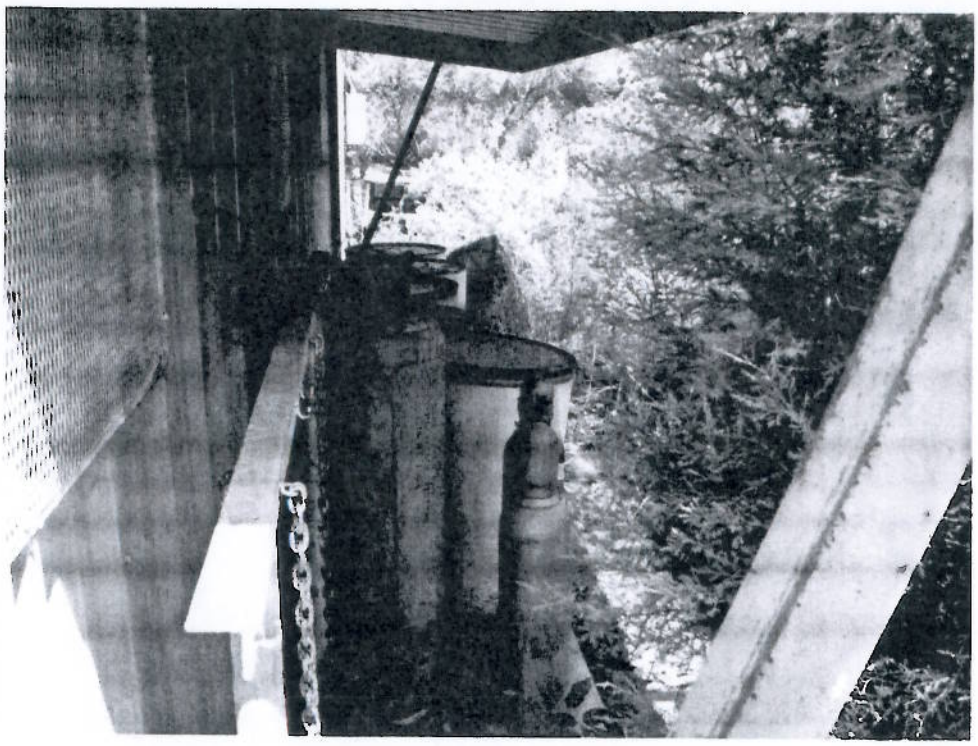


Photo #37 shows a view of four 55-gallon drums and three high pressure cylinders located on the south side of the Lab building at the Longview Refining Associates Plant. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

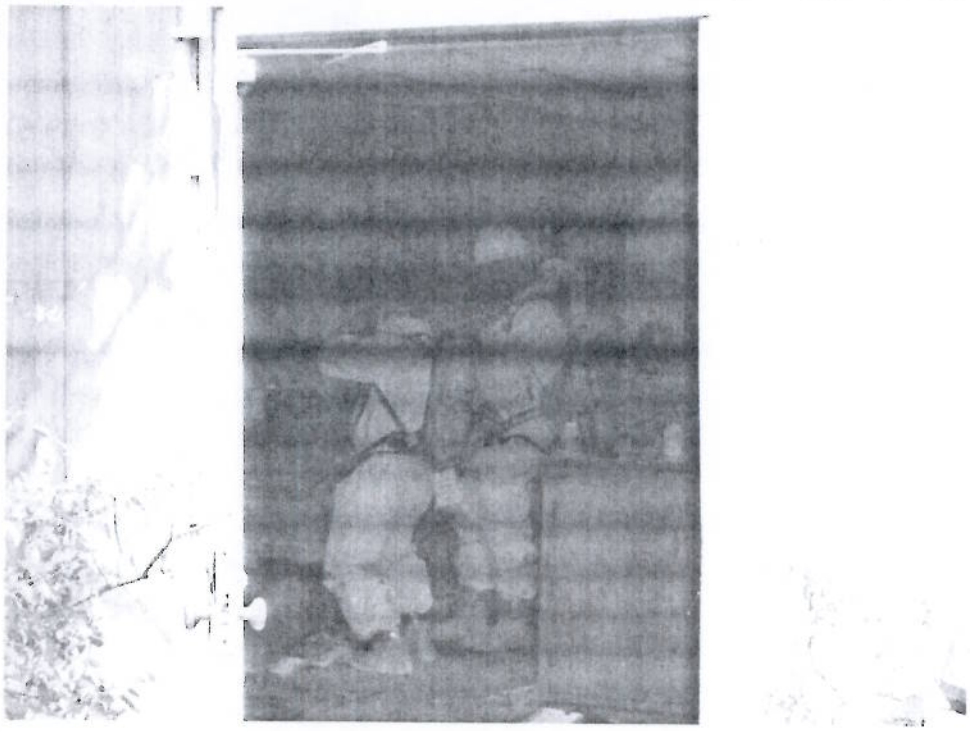


Photo #38 shows a view of two level "B" protected EPA START personnel inside the Laboratory building at the Longview Refining Associates Plant. These two personnel are in the process of sorting through some of the hundreds of containers of waste scatter throughout the lab. During this initial entry free beads of mercury were encountered in the Lab on the work benches. This photo was taken on 05/03/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera. This photo was digitally enhanced to bring out the details inside the building.

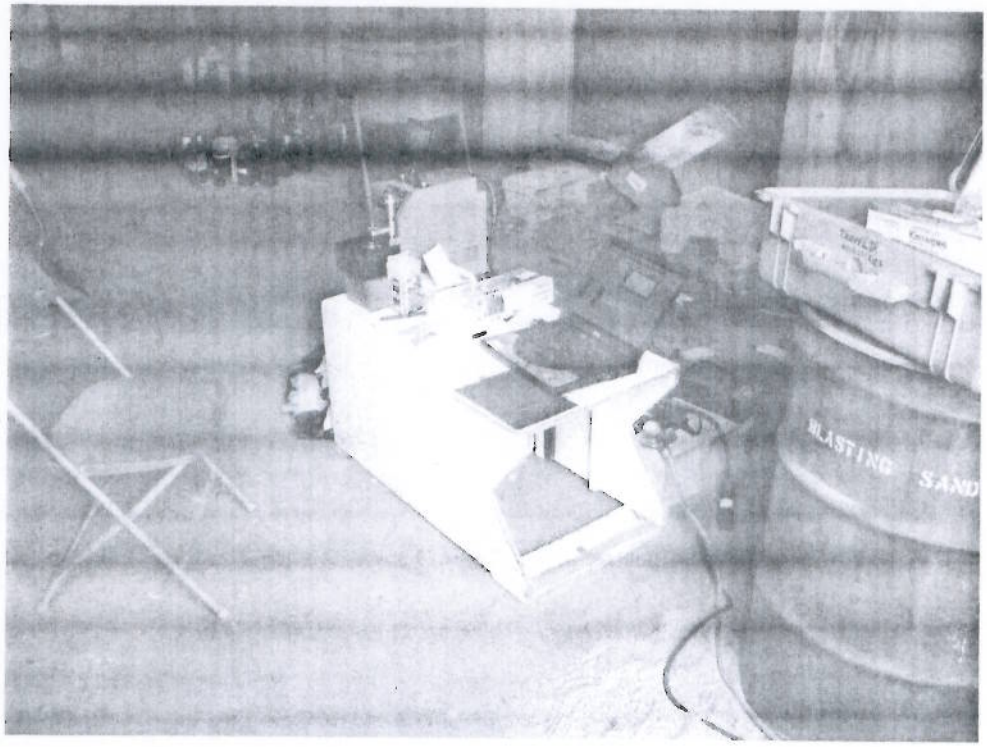


Photo #39 shows a view of the TCEQ Region 5 TravelIR setup to assist in the analysis o wastes at the Longview Refining Associates Plant. The equipment is setup inside the Plant Maintenance Shop, which was used as a staging area and field lab by the investigation team. This photo was taken on 05/04/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera. It was digitally enhanced to bring out more of the background details.

Photo #40 shows a view of Mr. Chad Conway, EPA START, working in level "B" protection gear inside the Plant Maintenance Building at the Longview Refining Associates Plant. Mr. Conway is in the process of conducting hazard category analysis (HAZCAT) process some of the hundreds of containers of waste found in the Plant Laboratory. The HAZCAT Kit (orange box) is visible on the table in the center of the photo. Clusters of HAZCATed containers can be seen stored the floor and tables along the right side of the photo. This photo was taken on 05/04/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #41 shows personnel from United States Environmental Services (USES) re-packing caustic briquets, outside the warehouse at the Longview Refining Associates Plant. USES is the EPA Clean-up Contractor on the project. This photo was taken on 05/08/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #42 shows a view of a pile of spent gloves, booties, and Tyveck suits used by the EPA contractors during the recent containment and removal work at the Longview Refining Associates Plant. This photo was taken on 05/08/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photos #43-#44 shows a view of the repackaged wastes stored inside the warehouse at the Longview Refining Associates Plant. Contractor personnel placed all of the waste which was previous stored inside boxes and bags into plastic and metal drums. This photo was taken on 05/08/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #45 shows another view of the repackaged waste stored inside the warehouse at the Longview Refining Associates Plant. This photo was taken on 05/08/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

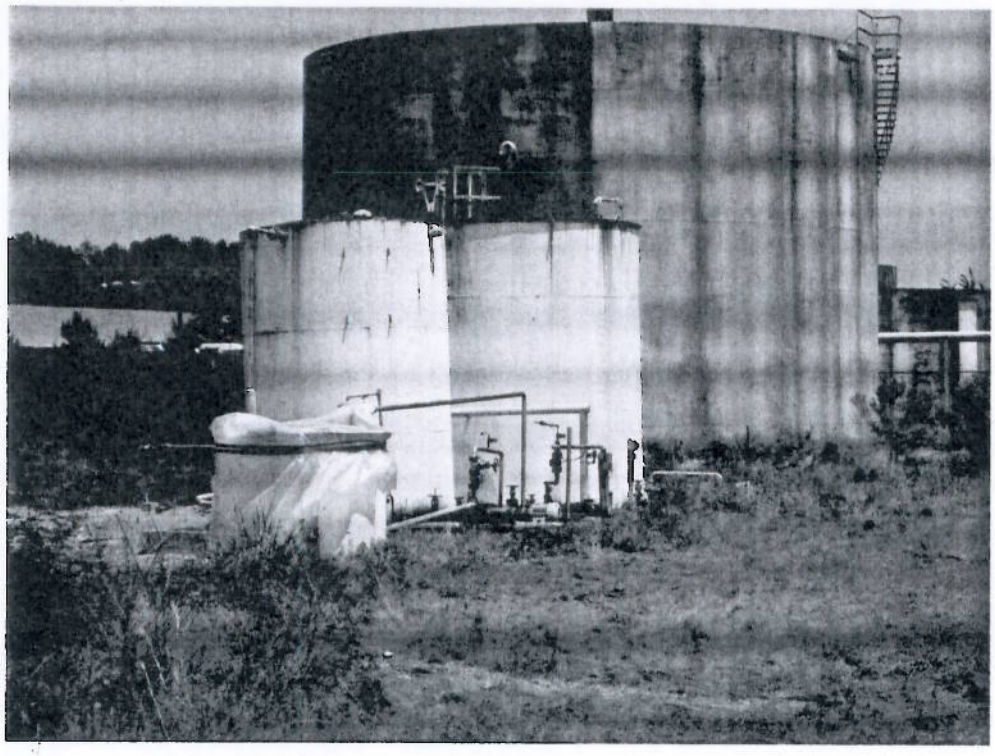


Photo #46 shows a view of Tanks -11A (left) and 11-B(right), at the Longview Refining Associates Plant. The caustic mix tank can be seen wrapped in plastic sheeting in the foreground as it still contains a thin layer of caustic solid material in the bottom. The rusted tank visible in the background is Tank-10. Caustic waste has been removed from the mix tank and Tank-11A, and placed in drums. Tank-11B contains 4,000 gallons of caustic waste, but this is scheduled to be pumped out and removed from the site along with the other hazardous wastes found on-site. This photo was taken on 05/08/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

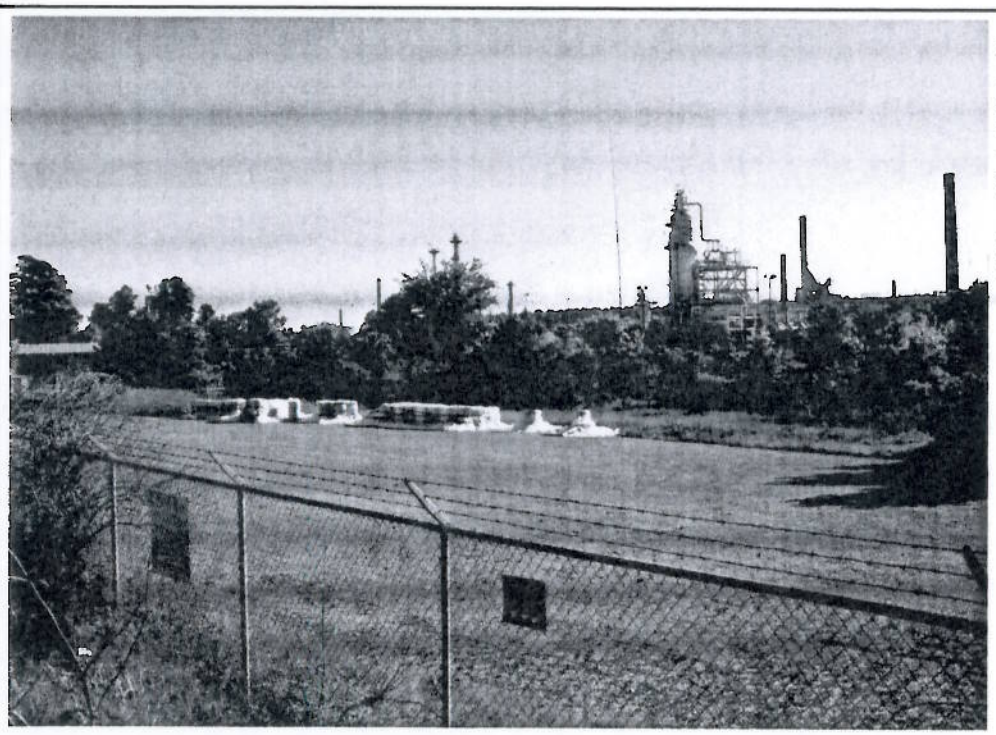


Photo #47 shows a view of the estimated 90 drums of hazardous waste staged for removal in the parking lot on the NE corner of the Longview Refining Associates Plant. This photo was taken on 05/11/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.

Photo #47 shows an aerial view of the abandoned Longview Refining Associates Plant. This photo shows a view looking north across the site, and shows how overgrown the site is with vegetation. This photo was taken on 06/26/2006, by Dale Vodak of the TCEQ Region 5 Tyler, using a Canon Power Shot A-160 (5.0 MEGA PIXEL) digital camera.