REDACTED VERSION

RC 3/13/85

EPA POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (to be assigned by HQ)
6	TX13838

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

TXD 041 468 836

A. SITE NAME: Texas Electric Co-Op

B. STREET (or other identifier): Beril Loop Rd., SE of Jasper

C. CITY: Jasper

D. STATE: Texas

E. ZIP CODE: 57591

F. COUNTY NAME: Jasper

G. OWNER/OPERATOR (if known) P. O. Box 510, Jasper, TX 57591

1. NAME: Randy V. Dorman, Director Technical Services

2. TELEPHONE NUMBER: 409/384-4633

H. TYPE OF OWNERSHIP

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

I. SITE DESCRIPTION

Creosoting plant which has approximately 9 on site treating ponds

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

TDWR

K. DATE IDENTIFIED (*mo., day, & yr.*)

November 1984

L. PRINCIPAL STATE CONTACT

1. NAME: Bob Chapin, TDWR

2. TELEPHONE NUMBER: 512/475-6371

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

JAN 12 1993

REORGANIZED

C. PREPARER INFORMATION

1. NAME: Robert H. Davis, Jr., Engineering Science

2. TELEPHONE NUMBER: 512/477-9901

3. DATE (*mo., day, & yr.*): 2/14/85

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*): 2491

C. AREA OF SITE (*in acres*): Approx. 40

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

1. LATITUDE (*deg.—min.—sec.*): 30° 54' 42"

2. LONGITUDE (*deg.—min.—sec.*): 93° 58' 30"

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES (*specify*): Process Bldgs., office

Reviewed by 6AW-SC date 6/12/85

T2070-2 (10-79)

Continue On Reverse

90044667

Continued From Front

CHARACTERIZATION OF SITE ACTIVITY

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

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

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED Plant uses creosote to pressure treat utility poles. Has two closed waste impoundments with residues probably in-place. Has 4 active evaporation ponds for "no discharge" of process waters. One API separator. Other pits to be closed by 1987.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

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

B. WASTE CHARACTERISTICS

[ ] 1. UNKNOWN [ ] 2. CORROSIVE [ ] 3. IGNITABLE [ ] 4. RADIOACTIVE [ ] 5 HIGHLY VOLATILE
[XX] 6. TOXIC [ ] 7. REACTIVE [ ] 8. INERT [ ] 9. FLAMMABLE

[ ] 10. OTHER (specify):

C. WASTE CATEGORIES

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

Yes. TDWR Part A and Subcontractor Study

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 45,000	AMOUNT Unknown	AMOUNT None	AMOUNT Unknown	AMOUNT Unknown	AMOUNT None
UNIT OF MEASURE lbs/yr	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
'X' (1) PAINT, PIGMENTS	'X' XX (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-HALOGNTD SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
XX (5) OTHER (specify): Creosote tank bottoms (K001) as indicated by TDWR Part A Also bottom sludges in waste impoundments			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	X (6) OTHER (specify): Creosote-contaminated Soils (U051)	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			X (11) OTHER (specify): Creosote		

Continue On Page 3

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).

Creosote and related PNA's and phenols

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

See Attached Comments

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				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY	X			By nature of business
5. CONTAMINATION OF WATER SUPPLY	X			Nearby wells should be sampled
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER		X	1983	GW compliance plan mandated
8. CONTAMINATION OF SURFACE WATER		X	6/29/76	Alledged unauthorized release to stream
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS		X	12/19/84	Reconaissance observation
13. CONTAMINATION OF SOIL	X			Nature of business
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.

- [ ] 1. NPDES PERMIT
- [ ] 2. SPCC PLAN
- [X] 3. STATE PERMIT (specify): SW 31340 WQ01766
- [ ] 4. AIR PERMITS
- [ ] 5. LOCAL PERMIT
- [ ] 6. RCRA TRANSPORTER
- [ ] 7. RCRA STORER
- [ ] 8. RCRA TREATER
- [ ] 9. RCRA DISPOSER

NPDES TX 0006351

- [X] 10. OTHER (specify): TXD 04 146 8836 RCA Generator

B. IN COMPLIANCE?

- [ ] 1. YES
- [ ] 2. NO
- [XX] 3. UNKNOWN
- 4. WITH RESPECT TO (list regulation name & number):

VIII. PAST REGULATORY ACTIONS

- [ ] A. NONE
- [X] B. YES (summarize below)

Groundwater contamination determined by detection monitoring program in 1982 and 1983. Assessment revealed minor leakage to uppermost zone.

IX. INSPECTION ACTIVITY (past or on-going)

- [ ] 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
Solid Waste Compliance	6/7/84	TDWR	Problems, with closure/post-closure plan
Solid waste compliance	2/3/83	TDWR	Insufficient RCRA plans; corrected
Continued on Attachment	A		

X. REMEDIAL ACTIVITY (past or on-going)

- [XX] 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
IX	INSPECTION ACTIVITY, CONT'D

Wastewater	8/19/82	TDWR	No discharge; good
Wastewater	12/15/83	TDWR	" "
Wastewater	10/ 6/80	TDWR	Ponds A & B not closed yet
Wastewater	4/26/79	TDWR	" "
Wastewater	2/14/78	TDWR	" "
Wastewater	8/10/77	TDWR	" "
Wastewater	7/26/76	TDWR	No discharge, compliant
Wastewater	6/10/75	TDWR	No self-reporting data
Complain Investigator	6/29/76	TDWR	Alleged discharge to creek
Wastewater	1/11/72	TDWR	New pond construction approved

RCRA 3012 PRELIMINARY ASSESSMENT COMMENTS
TEXAS ELECTRIC CO-OP
JASPER, TEXAS

INTRODUCTION

On December 19, 1984 Robert H. Davis Jr. of Engineering-Science, Inc. conducted a RCRA 3012 preliminary assessment of the Texas Electric Co-op facility southeast of Jasper, Texas. The assessment consisted of a review of available file information, discussions with TDWR District 6 personnel, and an off-site reconaissance with photographs.

SITE INFORMATION AND OBSERVATIONS

Texas Electric Cooperatives, Inc. is located southeast of the city of Jasper, approximately 0.6 miles south of U.S. Highway 190 adjacent to Bevil Loop Road in Jasper County, Texas. The company is registered with the Texas Department of Water Resources (TDWR) as a generator of industrial solid waste (Registration No. 31340) and has a TDWR wastewater permit (Permit No. 01766).

The facility is a wood preserving plant that uses creosote in their process. The company has 11 ponds that are used in their wastewater treatment system that accumulates sludge from the wood preserving treatment of utility poles. The effluent is discharged to an unnamed creek, thence into Big Walnut Run Creek, thence into the Neches River (Segment 0604).

On October 16, 1980 TDWR requested enforcement action against Texas Electric Cooperatives, Inc., for continued permit violations. The resulting amended permit (Permit No. 01766) required the company to prepare and initiate a ground water monitoring plan. This plan has been initiated and eight monitor wells were installed around the ponds. When significant increases were determined for TOC and phenols the Company drilled three more wells to evaluate the extent of contamination in an assessment program. They have recently submitted a Part B application and area currently preparing a groundwater compliance plan application. Groundwater flow is toward the southwest and the site is underlain by two to three sand zones separated by relatively imparmeable clays ($K=10^{-9}$) of the 11 ponds, one

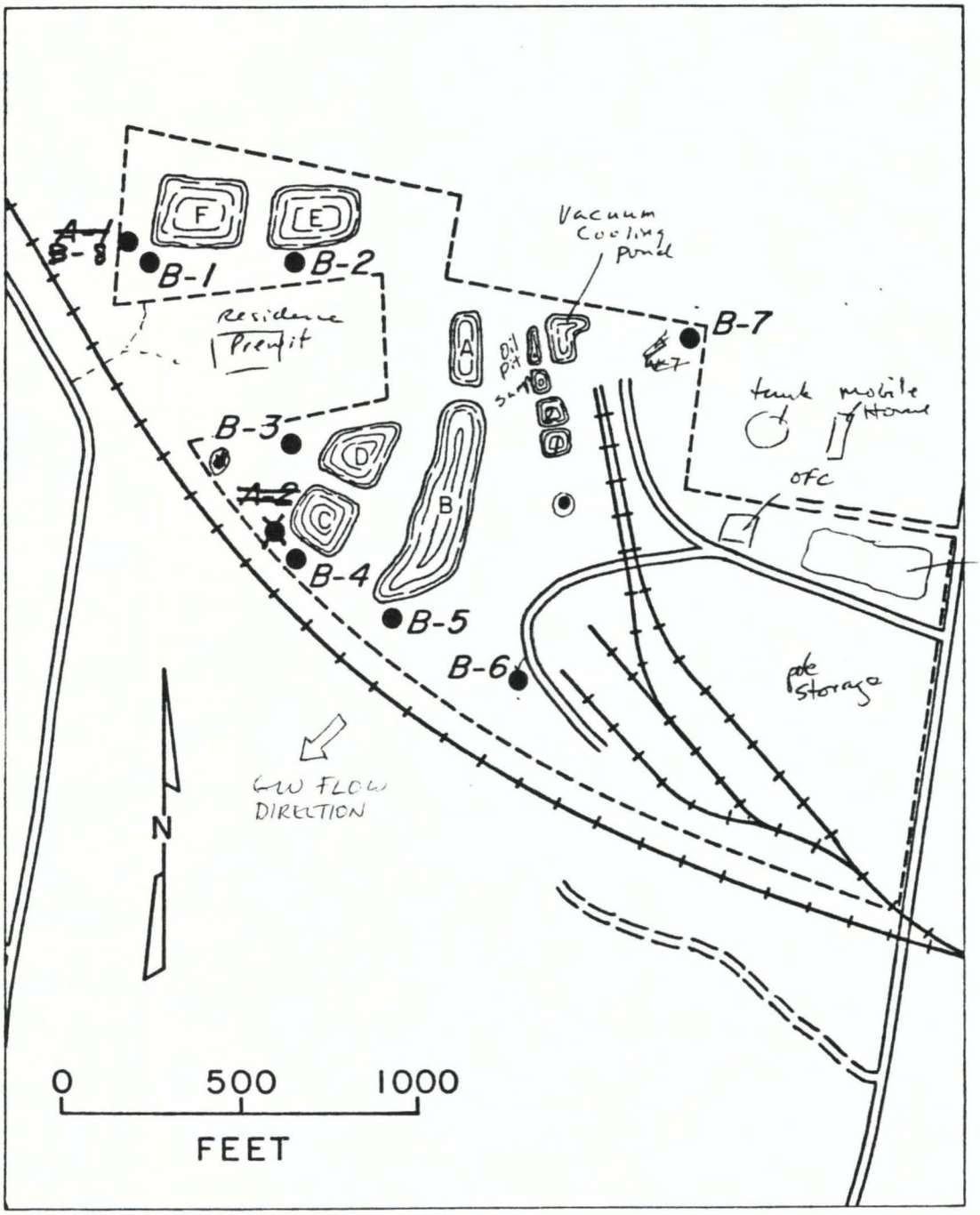
(Pond A) has been filled in and closed out and another (Pond B) was lined and converted to a stromwater retention pond. The TDWR Part A indicated that there was also a below grade, unlined surface impoundment that was closed in addition to Pond A. Four of the large ponds are used for evaporation. However, it was determined that the primary source of groundwater contamination was the series of treatment ponds on the east side of the site rather than the evaporation ponds. The site also has two deeper wells for potable and firewater supply.

Hazardous wastes generated at the plant include creosote tank bottoms (45,000 lb/yr), creosote contaminated dirt (U051) and waste treatment sludge (K001).

The following observations were made during the reconaissance. Creosote odors were apparent from 0.5 mile away. There is a waterfilled sand pit near the entrance but this pond did not appear to contain wastes or process materials. Surrounding land uses are undeveloped woods and light residential development. A mobile home park is located 0.2 miles SE of the site. A resident at this subdivision indicated that the houses were hooked to the City of Jasper public water supply. Other residences are lightly scattered around the TEC property. One residence immediately west of the property is that of (b) (6) [redacted] Jasper.

ASSESSMENT

The subject site is currently undergoing a groundwater contamination investigation by TDWR. The TDWR contacts are Elaine Allan, who is also evaluating the Part B, and Paul Lewis. The full waste management history has not been determined. Because there are at least two closed waste ponds at the site, a low priority site inspection is recommended. The potential threat to area groundwater appears to be of greater concern than stream impact although one allegation of unauthorized discharges was reported in June of 1976.



EXPLANATION

● SUGGESTED LOCATION FOR MONITOR WELL

~~A-1~~, B-1 MONITOR WELL NUMBER, LETTER INDICATES SAND IN WHICH WELL IS TO BE COMPLETED

FROM GUYTON REPORT

Figure 7. SUGGESTED LOCATIONS FOR MONITOR WELLS