VELSICOL TX 4707

8306-29

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION	SITE NUMBER (to be assigned by Hq)
6	

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (*Section II*). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms 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

A. SITE NAME: Mobil Chemical Co. Old Terphthalic Acid Plant
B. STREET (or other identifier): West Port Arthur Road
C. CITY: Nederland
D. STATE: TX
E. ZIP CODE: 77705
F. COUNTY NAME: Jefferson

G. SITE OPERATOR INFORMATION
1. NAME: Mobil Chemical Co.-Petrochemical Division J.A. Bowman, Jr. - Mgr. Environmental Control
2. TELEPHONE NUMBER: 713-871-5770
3. STREET: One Greenway Plaza
4. CITY: Houston
5. STATE: TX
6. ZIP CODE: 77046

H. REALTY OWNER INFORMATION (if different from operator of site)
1. NAME: Mobil Chemical Company ~~D.A. Arenci, Mgr. Environmental Affairs~~
2. TELEPHONE NUMBER: ~~201-754-7070~~
3. CITY: 150 Kennedy Parkway, Short Hills
4. STATE: N.J.
5. ZIP CODE: 07078

I. SITE DESCRIPTION: An inactive surface impoundment and a second surface impoundment which is jointly owned with Velsicol Chemical, Corp. TXD067261412

J. TYPE OF OWNERSHIP
☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.):
B. APPARENT SERIOUSNESS OF PROBLEM
☐ 1. HIGH ☐ 2. MEDIUM ☒ 3. LOW ☐ 4. NONE

C. PREPARER INFORMATION
1. NAME: Steve A. Mellon S.A. Mellon
2. TELEPHONE NUMBER: 214-742-4521
3. DATE (mo., day, & yr.): 9-14-83

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION
1. NAME: Steven A. Mellon
2. TITLE: FIT Geologist
3. ORGANIZATION: Ecology And Environment, Inc. 1509 Main St., Dallas, TX 75201
4. TELEPHONE NO. (area code & no.): 214-742-4521

B. INSPECTION PARTICIPANTS

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
Larry Landry	Ecology And Environment, Inc.	214-742-4521
		~~SUPERFUND FILE~~
		SEP 10 1992

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS REORGANIZED
Patrick B. Mullin	Environmental Supervisor 409-839-1243	P.O. Box 3868, Beaumont, TX 77704
J. Richard Seale	Sr. Environmental Engr. 409-839-1245	" "
V.A. Bowman, Jr.	Mgr. Environmental Control 713-871-5770	One Greenway Plaza East, Houston, TX 77046

90068966

Continued From Front

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
Mobil Oil Co. Petrochemical Div.	409-839-1243	P.O. Box 3868, Beaumont, TX	Liquid

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
Not applicable			

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS
Not applicable		

G. DATE OF INSPECTION (mo., day, & yr.)	H. TIME OF INSPECTION	I. ACCESS GAINED BY: (credentials must be shown in all cases)
8-2-83	0830 hrs.	[X] 1. PERMISSION [ ] 2. WARRANT

J. WEATHER (describe)

Partly cloudy 87° winds from SSE

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
a. GROUNDWATER			
b. SURFACE WATER			
c. WASTE			
d. AIR			
e. RUNOFF			
f. SPILL			
g. SOIL			
h. VEGETATION			
i. OTHER (specify)	X	No samples taken during inspection	

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS
None		

Continue On Page 3

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS: [X] a. GROUND [ ] b. AERIAL
2. PHOTOS IN CUSTODY OF: EPA Region VI (attached)

D. SITE MAPPED?

[X] YES. SPECIFY LOCATION OF MAPS: EPA Region VI (attached)

E. COORDINATES

1. LATITUDE (deg.-min.-sec.): 29°58'17" N
2. LONGITUDE (deg.-min.-sec.): 94°03'34" W

V. 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.)

[X] 2. INACTIVE (Those sites which no longer receive wastes.) Closed 1973

[ ] 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 [X] 2. YES (specify generator's four-digit SIC Code): During operation of Terephthalic acid plant

C. AREA OF SITE (in acres)

See foot note *

D. ARE THERE BUILDINGS ON THE SITE?

[X] 1. NO [ ] 2. YES (specify):

VI. 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		1. PILE		1. FILTRATION		1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE		3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND		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):		6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify):		

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this form.

[ ] 1. STORAGE [ ] 2. INCINERATION [ ] 3. LANDFILL [X] 4. SURFACE IMPOUNDMENT [ ] 5. DEEP WELL

[ ] 6. CHEM/BIO/PHYS TREATMENT [ ] 7. LANDFARM [ ] 8. OPEN DUMP [ ] 9. TRANSPORTER [ ] 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

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

B. WASTE CHARACTERISTICS

[ ] 1. CORROSIVE [ ] 2. IGNITABLE [ ] 3. RADIOACTIVE [ ] 4. HIGHLY VOLATILE

[ ] 5. TOXIC [X] 6. REACTIVE [ ] 7. INERT [ ] 8. FLAMMABLE

[X] 9. OTHER (specify): Low PH

C. WASTE CATEGORIES

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

None available

*Currently Mobil Chemical Company owns a 14 acre inactive surface impoundment and approximately half of a jointly owned 14.69 acre surface impoundment with Velsicol Chemical Corp.

Continued From Front

VII. WASTE RELATED INFORMATION (continued)

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 None	AMOUNT None	AMOUNT None	AMOUNT Unknown	AMOUNT None	AMOUNT None
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
X (1) PAINT, PIGMENTS	X (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 SMELTING WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X')			3. TOXICITY (mark 'X')				4. CAS NUMBER	5. AMOUNT	6. UNIT
	a. SOLID	b. LIQ.	c. VAPOR	a. HIGH	b. MED.	c. LOW	d. NONE			
Unknown										

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

___ A. HUMAN HEALTH HAZARDS

 Continue On Page 5

Continued From Page 4

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE

☐ C. WORKER INJURY/EXPOSURE

☐ D. CONTAMINATION OF WATER SUPPLY

☐ E. CONTAMINATION OF FOOD CHAIN

☐ F. CONTAMINATION OF GROUND WATER

☒ G. CONTAMINATION OF SURFACE WATER

The middle impoundment (see sketch) is jointly owned by the Velsicol Chemical Corp. and Mobil Chemical Company. Potentially contaminated plant runoff water from the Velsicol Plant may enter the middle impoundment. Possible seepage from the impoundment may cause contamination of the surface waters in the area.

Continue On Reverse

Continued From Front

VIII. HAZARD DESCRIPTION *(continued)*

☐ H. DAMAGE TO FLORA/FAUNA

☐ I. FISH KILL

☐ J. CONTAMINATION OF AIR

☐ K. NOTICEABLE ODORS

☐ L. CONTAMINATION OF SOIL

☐ M. PROPERTY DAMAGE

Continue On Page 7

Continued From Page 6

VIII. HAZARD DESCRIPTION (continued)

☐ N. FIRE OR EXPLOSION

☐ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

☐ P. SEWER, STORM DRAIN PROBLEMS

☐ Q. EROSION PROBLEMS

☐ R. INADEQUATE SECURITY

☐ S. INCOMPATIBLE WASTES

Continue On Reverse

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

☒ U. OTHER (specify):

From 1966 to 1973 Mobil Chemical Company, Petrochemical Divison, operated a terephthalic acid plant on west Port Arthur Road which is approximately 7-8 miles southeast of the Mobil Oil Corporation Complex of Beaumont, Texas. In 1973, the Mobil Chemical Company sold this plant to Velsicol Chemical Corp. (TX 4707) which now produces Banvel (diacamba) herbicide from 3,4-dichloro phenol. Only 200 acres of the old terephthalic acid plant was sold to Velsicol leaving one storm water pond(surface impoundment) under Mobil ownership and a second storm water pond under joint ownership with Velsicol. During the operation by Mobil of the terephthalic acid plant, three surface impoundments were used as surge ponds for surface runoff from the plant (see attached site sketch). Approximately 150,000 gallons/month of storm water and surface runoff were allowed to evaporate in the ponds. The ponds were emptied and their contents injected into permitted wells on-site at a depth of 5600-7100 feet. The B.O.D. in the first wash pond ran 100-200 and was therefore diluted by pumping this solution into the other ponds. The pH of this solution (acetic acid) was four. The western most surface impoundment has been breached on the SE, SW and NW corners to prevent future use. However, the entire middle impoundment appears to be used by Velsicol although only half of the 14.69 acre pond is owned by Velsicol. The westernmost pond presents no hazard to the environment as it contains no liquids other than surface water. No review of the Velsicol ponds was made at this time due to the EIT inspection of 7-28-83 (TX 4707). A consideration of surface (see attachment A)

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS	100	100	25	1 mile
2. IN COMMERCIAL OR INDUSTRIAL AREAS	100-150	100-150	15	1 mile
3. IN PUBLICLY TRAVELLED AREAS	50-100	50-100	5	1 mile
4. PUBLIC USE AREAS (parks, schools, etc.)	50	50	2	1 mile

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
<5 ft.** 300-700 ft.+	5** 5 +	None
C. POTENTIAL YIELD OF AQUIFER	**E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)**	**F. DIRECTION TO DRINKING WATER SUPPLY**
Unknown ** Avg= 2000 gpm+	approx 2½ miles	southeast

G. TYPE OF DRINKING WATER SUPPLY

☐ 1. NON-COMMUNITY < 15 CONNECTIONS ☒ 2. COMMUNITY (specify town): > 15 CONNECTIONS Nederland, Texas

☐ 3. SURFACE WATER ☒ 4. WELL

 Continue On Page 9

**Local water table
+Regional Aquifer-Gulf Coast Sands Aquifer
References: U.S.G.S. Professional Paper 813-F TWDB Report #78

Continued From Page 8

X. WATER AND HYDROLOGICAL DATA (continued)

H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COMMUNITY (mark 'X')	5. COMMUNITY (mark 'X')
Sanitary	Unknown	On site at Old Terephthalic Acid Plant		

I. RECEIVING WATER

1. NAME: Neches River

☐ 2. SEWERS ☒ 3. STREAMS/RIVERS ☐ 4. LAKES/RESERVOIRS ☐ 5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

Use: Non contact recreation, propagation of fish and wildlife, contact recreation, domestic raw water supply.

XI. SOIL AND VEGITATION DATA

LOCATION OF SITE IS IN:

☐ A. KNOWN FAULT ZONE ☐ B. KARST ZONE ☒ C. 100 YEAR FLOOD PLAIN ☐ D. WETLAND

☒ E. A REGULATED FLOODWAY ☐ F. CRITICAL HABITAT ☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

'X'	A. OVERBURDEN	'X'	B. BEDROCK (specify below)	'X'	C. OTHER (specify below)
X	1. SAND		None visible		
X	2. CLAY				
	3. GRAVEL				

XIII. SOIL PERMEABILITY

☐ A. UNKNOWN ☐ B. VERY HIGH (100,000 to 1000 cm/sec.) ☐ C. HIGH (1000 to 10 cm/sec.)

☒ D. MODERATE (10 to .1 cm/sec.) to ☒ E. LOW (.1 to .001 cm/sec.) ☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA

☐ 1. YES ☒ 2. NO 3. COMMENTS:

H. DISCHARGE AREA

☐ 1. YES ☒ 2. NO 3. COMMENTS:

I. SLOPE

1. ESTIMATE % OF SLOPE: 0-1%

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.: southerly

J. OTHER GEOLOGICAL DATA

The site lies on the Beaumont formation which is comprised of alternating sands and clays with an approximate thickness of 100 feet in the Beaumont area.

 Continue On Reverse

Continued From Front

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X')		
					1. YES	2. NO	3. UNKNOWN
Plant was sold in 1973							

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☒ NONE ☐ YES *(summarize in this space)*

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition *(Section II)* information on the first page of this form.

SURFACE IMPOUNDMENTS SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION
Answer and Explain as Necessary.

1. TYPE OF IMPOUNDMENT

Storm water-runoff of pond.

2. STABILITY/CONDITION OF EMBANKMENTS

The westernmost impoundment is breached on theSE, SW & NW corners. The middle impoundment appears to be stable.

3. EVIDENCE OF SITE INSTABILITY *(Erosion, Settling, Sink Holes, etc.)*

[X] YES [ ] NO Some erosion of dikes at the westernmost impoundment

4. EVIDENCE OF DISPOSAL OF IGNITABLE OR REACTIVE WASTE

[ ] YES [X] NO

5. ONLY COMPATIBLE WASTES ARE STORED OR DISPOSED OF IN THE IMPOUNDMENT

[X] YES [ ] NO

6. RECORDS CHECKED FOR CONTENTS AND LOCATION OF EACH SURFACE IMPOUNDMENT

[X] YES [ ] NO

7. IMPOUNDMENT HAS LINER SYSTEM

[ ] YES [X] NO

7a. INTEGRITY OF LINER SYSTEM CHECKED

[ ] YES [ ] NO

7b. FINDINGS

8. SOIL STRUCTURE AND SUBSTRUCTURE

Beaumont Formation alternating clay and sand layers.

9. MONITORING WELLS

[ ] YES [X] NO

10. LENGTH, WIDTH, AND DEPTH

LENGTH 780 ft. WIDTH 780 ft. DEPTH 4-6 ft.

11. CALCULATED VOLUMETRIC CAPACITY

101,000 - 135,000 yd^3

12. PERCENT OF CAPACITY REMAINING

90-100% on the middle impoundment

13. ESTIMATE FREEBOARD

4-6 feet

14. SOLIDS DEPOSITION

[ ] YES [X] NO

15. DREDGING DISPOSAL METHOD

None

16. OTHER EQUIPMENT

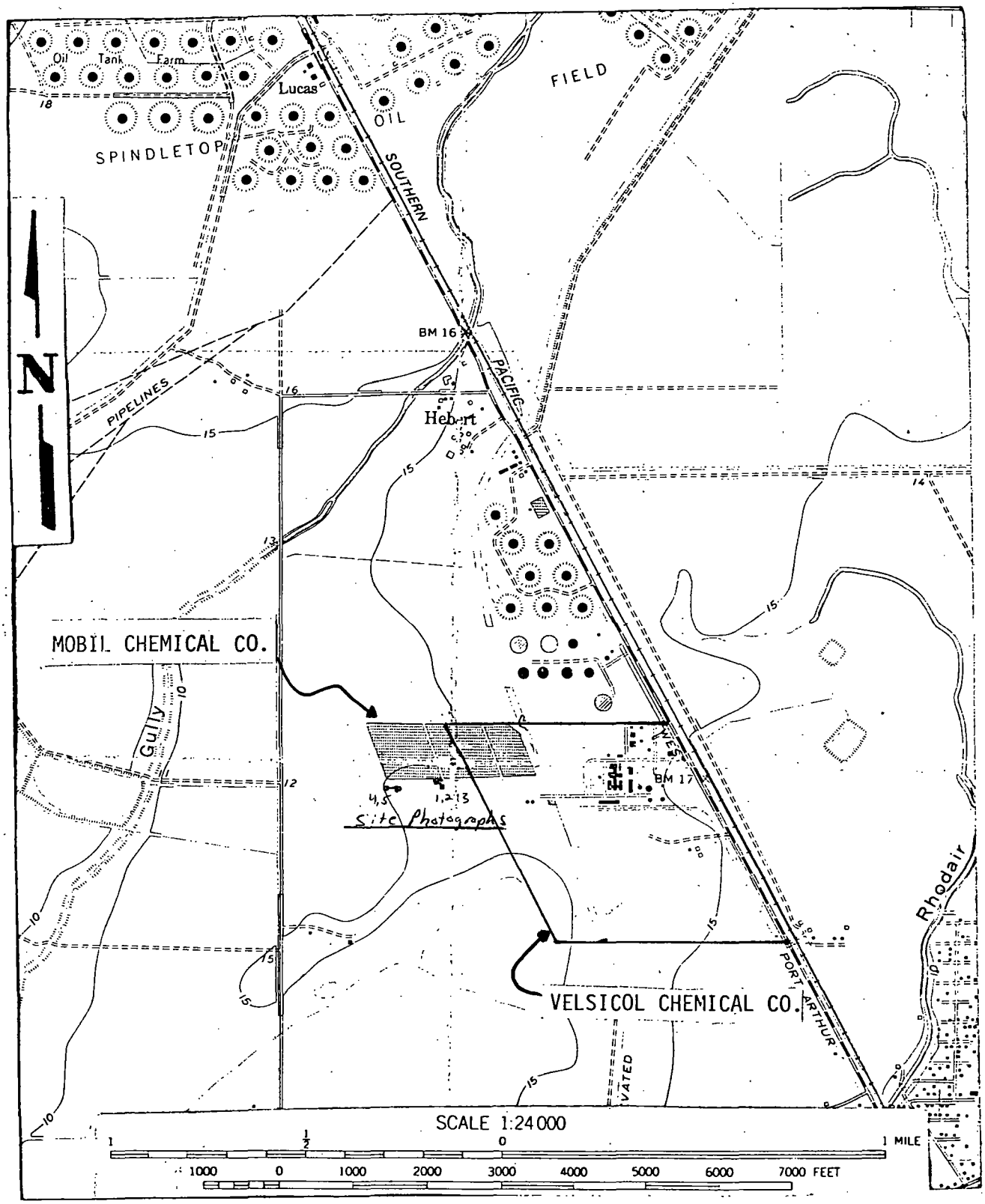
Sump pumps to transfer storm water.

ATTACHMENT A

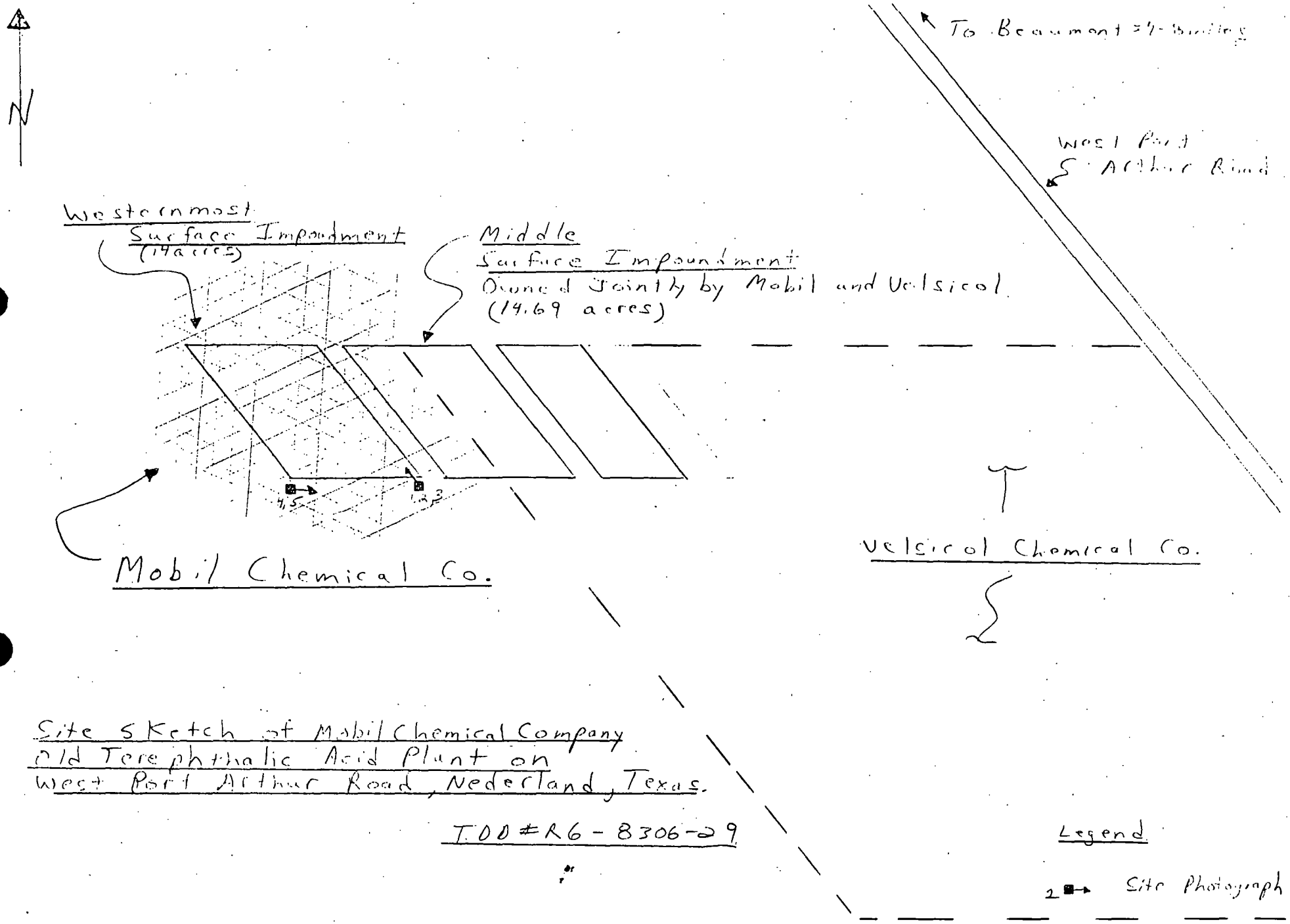
POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-3.

Corresponding number on form	Additional Remark and/or Explanation
VIII.U.	contamination in the area of the middle surface impoundment is included in the sampling plan of the 7-28-83 report. It is recommended that further characterization of the middle impoundment be accomplished under the proposed sampling plan for the Velsicol Plant.



Location of the Mobil Chemical Company property adjacent to the Velsicol Chemical Corporation Plant on the west Port Arthur Road, Beaumont, Texas. Map taken from U.S.G.S. 7½ minute Port Arthur Quadrangle, North-Central Sector.



Site Sketch of Mobil Chemical Company
Old Terephthalic Acid Plant on
West Port Arthur Road, Nederland, Texas.

TDD #R6-8306-09

Photographer / Witness

Mellon / Landry

Date / Time / Direction

8-2-83 / 1133hrs. / NNE-NEE

Comments:

View from SW corner of westernmost stormwater impoundment facility adjacent to the Velsicol Chemical Plant on West Port Arthur Rd. Plant is visible in background. Site photographs #4 & 5. (See attached U.S.G.S. quadrangle sectors for location.)

R6-8306-29

Photographer / Witness

Mellon / Landry

Date / Time / Direction

8-2-83 / 1123-1124hrs / NW-NE

Comments:

View from SE corner of westernmost storm water impoundment facility adjacent to the Velsicol chemical plant on West Port Arthur Rd. Note breach in earthen dam; water, storm runoff, in foreground. Site Photographs #1, 2 & 3. (See attached U.S.G.S. quadrangle sectors for location.)

R6-83-06-09