8306-13

EPA POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (to be assigned by HQ)
6	4707

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

A. SITE NAME: Velsicol Chemical Corp.

B. STREET *(or other identifier)*: West Port Arthur Rd.

C. CITY: Nederland

D. STATE: TX

E. ZIP CODE: 77705

F. COUNTY NAME: Jefferson

G. OWNER/OPERATOR *(if known)*

1. NAME: Velsicol Chemical Corp., Marvin Fannin-Plant Mgr.

2. TELEPHONE NUMBER: 901/345-1788

H. TYPE OF OWNERSHIP

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

I. SITE DESCRIPTION: Site is an active manufacturing facility producing Banvel (dicamba) herbicide from 3,4-dichloro phenol. Previous site owners produced Terephthalic acid. Facilty began operation in 1974.

J. HOW IDENTIFIED *(i.e., citizen's complaints, OSHA citations, etc.)*: EPA Document 600/2-80-197" "Dioxins"

K. DATE IDENTIFIED *(mo., day, & yr.)*: 11/19/80

L. PRINCIPAL STATE CONTACT

1. NAME: Mike Moore, TDWR

2. TELEPHONE NUMBER: 409/883-2973

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. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY: FIT

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME: FGV David Anderson, FIT

2. TELEPHONE NUMBER: 214/742-4521

3. DATE *(mo., day, & yr.)*: July 28, 1983

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)*: 2879

C. AREA OF SITE *(in acres)*: 200; 100 in plant area

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

1. LATITUDE *(deg.—min.—sec.)*: 29°58'14" N

2. LONGITUDE *(deg.—min.—sec.)*: 94°03'28" W

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES *(specify)*: Plant, lab, and offices

T2070-2 (10-79)

90069003

Continue On Reverse

Continued From Front

IV. 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	X	1. LANDFILL
	2. SHIP	X	2. SURFACE IMPOUNDMENT		2. INCINERATION	X	2. LANDFARM
	3. BARGE	X	3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK	X	4. TANK, ABOVE GROUND		4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEMI/PHYS. TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):		6. OTHER (specify):	XX	6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING	X	7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify):		

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

All process water and rainfall collected from the process area is collected in tanks or impoundments west of the plant for injection well disposal (photo 7). Injection wells are approximately 6000 ft. deep. Silt from raw water supply is disposed of in a landfill/landfarm south of plant (Photo 8). Construction debris is disposed of in an

(See Attachment A)

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☒ 2. LIQUID ☒ 3. SOLID ☒ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☒ 2. CORROSIVE DCP ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 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, manifests

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: 24,000	AMOUNT: None	AMOUNT: 160,000,000
UNIT OF MEASURE: –	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE: gal/month	UNIT OF MEASURE:	UNIT OF MEASURE: gal/year
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 SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	X (5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	Potentially contaminated water from plant.
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			X (11) OTHER (specify): 3,4-dichloro phenol waste		

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).

TCDD isomers
2,4-dichloro phenol
dicamba
terephthalic acid.
toluene
1,2,4-trichloro benzene

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

Raw process water supply from Lower Neches Valley Authority, stored on site. All drinking water at site is bottled according to site representative.

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	X			Potential TCDD contamination
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL		X	1974	Velsicol was fined for a fish kill in Rhodair Gully.
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
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

- [X] 1. NPDES PERMIT
- [X] 2. SPCC PLAN
- [X] 3. STATE PERMIT (specify): Solid Waste Registration #30053
- [X] 4. AIR PERMITS
- [ ] 5. LOCAL PERMIT
- [ ] 6. RCRA TRANSPORTER
- [X] 7. RCRA STORER
- [X] 8. RCRA TREATER
- [X] 9. RCRA DISPOSER TXD067261412
- [X] 10. OTHER (specify): Injection well permits WDW 125 & WDW 155

B. IN COMPLIANCE?

- [X] 1. YES
- [ ] 2. NO
- [ ] 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number):

VIII. PAST REGULATORY ACTIONS

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

Fine for fish kill 1974.

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
Annual-inspection			TDWR, TAQCB

X. REMEDIAL ACTIVITY (past or on-going)

- [X] 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
IV. E.	area adjacent to the lagoons. Dichloro phenol waste is stored in tanks or in drums until it is picked up for off site disposal. There is some chromium in the boiler blowdown which is deepwell injected. A proposed sampling plan is attached.

SAMPLING PLAN

Grid No.		No. Samples
01	: Grassy area near lab building	1
02-05	: Grassy drainage ditches in process area	4
06	: Area adjacent to office	1
07-08	: Overgrown parking lot	2
09	: Area south of settling ponds	1
10-13	: Area east of plant and warehouse	4
14-19	: Area south of plant	6
35-40	: Area south of plant	6
22-28	: Area west of plant	7
20,21,41-43	: Area west of plant	1*
32-34,44-46	: Area west of plant	1*
29-31,47-49	: Area west of plant	1*
50-55	: Area west of plant	1*
56-57,64-65	: Area west of plant	1*
58-63	: Area west of plant	1*
68-71	: Area west of plant	1*
66-67,72-74	: Area west of plant	1*
75	: Parking north of office	1
76	: Parking south of office	1
	Total Field Samples	42

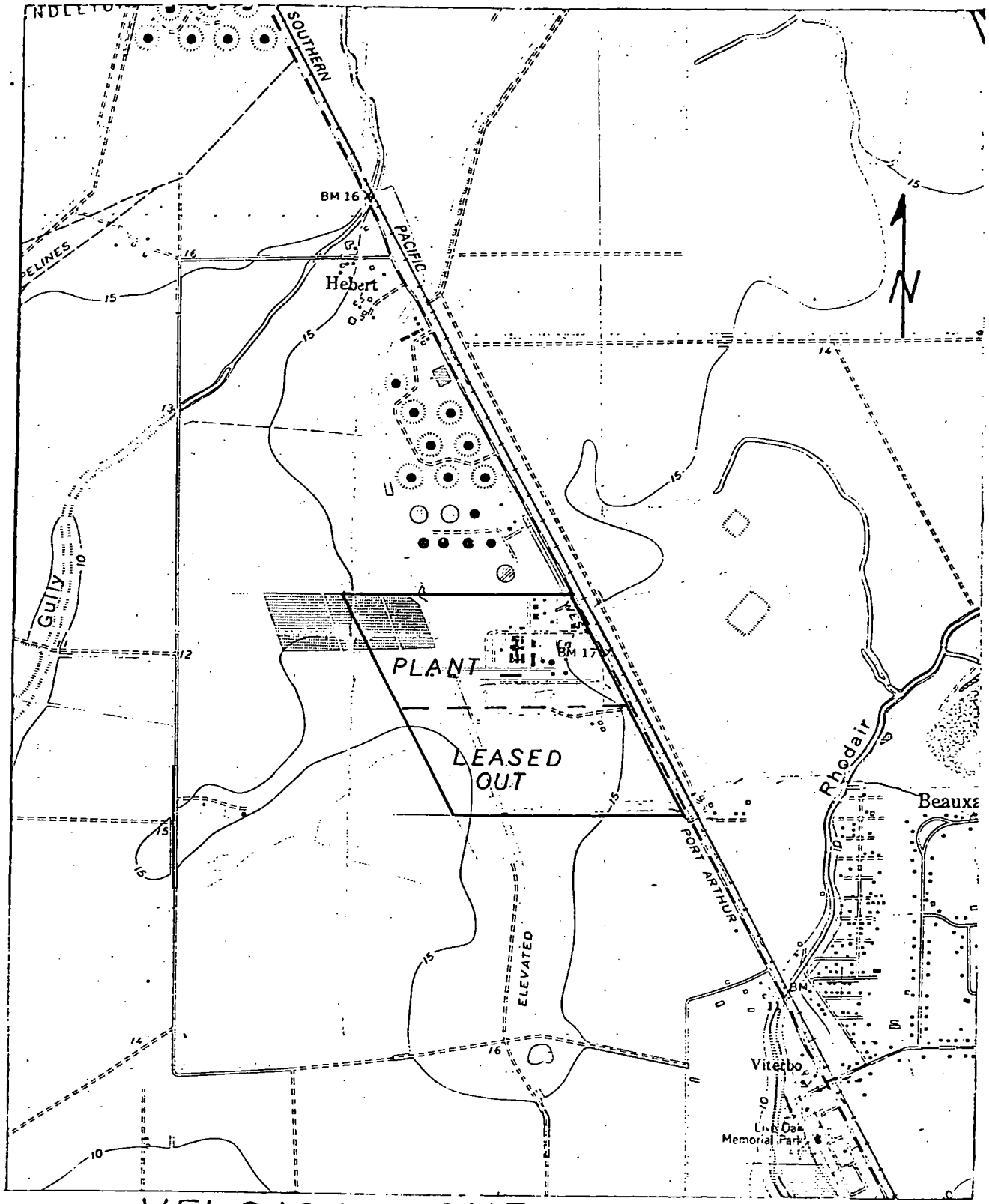
All samples except those marked by an asterisk will be collected as eight-point composites with aliquots taken from uniformly distributed locations within the grid (one sample per grid). Those samples marked by an asterisk will be composited with two aliquots taken from each grid block listed for that sample; several grid blocks will make up one sample.

Aliquots will be of surface soils from depths of 0-6". Compositing will be done by homogenizing sample aliquots in a stainless steel pan with stainless steel spoons.

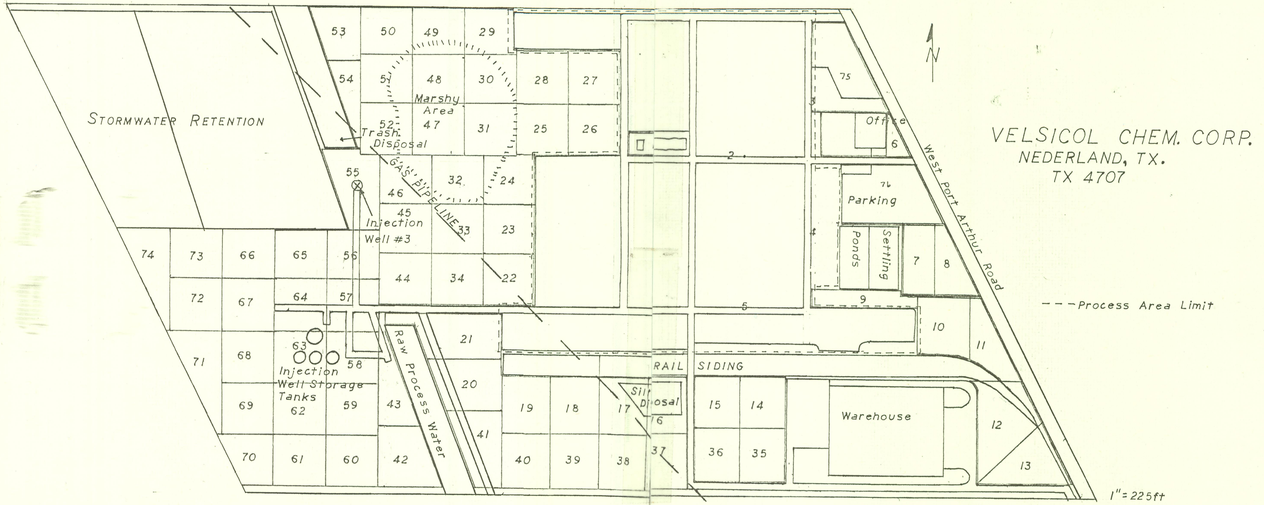
All roads within process area are paved. All process areas are concrete floored with retention walls. Grid 76 is an active employee parking lot, as is the western portion of grid 6. Grid 75 is an active construction parking lot. Grids 7 & 8 are located in an overgrown parking lot. Due to the compaction of these areas, it may be necessary to obtain a mounted auger to obtain soil samples from these areas. Background samples will be taken from each of four directions, approximately 1/2 to 1 mile from the site.

TOTAL SAMPLES

Onsite field samples	42
QA/QC duplicates	4
Blanks	2
Offsite background samples	4
Total	52



VELSICOL CHEMICAL CORP.
NEDERLAND, TX.
TX04707


VELSICOL CHEM. CORP.
NEDERLAND, TX.
TX 4707
N
Stormwater Retention
Marshy Area
Trash Disposal
Gas Pipeline
Injection Well #3
Injection Well Storage Tanks
Raw Process Water
Rail Siding
Silt Disposal
Warehouse
Parking
Ponds
Settling
Off
West Port Arthur Road
Process Area Limit
1" = 225ft