file

8309-19

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION: 6

SITE NUMBER (to be assigned by HQ): TX 11568

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: The Upjohn Co., Polymer Chemicals Div.

B. STREET (or other identifier): Battle ground Rd. (State Hwy 134)

C. CITY: La Porte

D. STATE: TX

E. ZIP CODE: 77571

F. COUNTY NAME: Harris

G. SITE OPERATOR INFORMATION

1. NAME: The Upjohn Co., Polymer Chemicals Div.

2. TELEPHONE NUMBER: 713-479-1541

3. STREET: Battle ground Rd.

4. CITY: La Porte

5. STATE: TX

6. ZIP CODE: 77571

H. REALTY OWNER INFORMATION (if different from operator of site)

1. NAME: Don Schmitz, Corporate Attorney

2. TELEPHONE NUMBER: 616-323-6620

3. CITY: The Upjohn Co., 700 Portage Rd. Kalamazoo

4. STATE: Michigan

5. ZIP CODE: 49001

I. SITE DESCRIPTION

Polymer chemical manufacturing plant with an onsite drum burial area.

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, FIT *Steven A. Mellon*

2. TELEPHONE NUMBER: 214-742-4521

3. DATE (mo., day, & yr.): 1-13-84

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION

1. NAME: Steven A. Mellon

2. TITLE: FIT - Geologist

3. ORGANIZATION: Ecology and Environment, Inc. 1509 Main Dallas, TX 75201

4. TELEPHONE NO. (area code & no.): 214-742-4521

B. INSPECTION PARTICIPANTS

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
Ray Roblin	Ecology And Environment, Inc.	214-742-4521

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

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
B.W. Ryan	Environmental Supervisor 713-479-1541	P.O. Box 685, La Porte, TX
Steve Beisser	Environmental Service Supervisor 713-479-1541	P.O. Box 685, La Porte, TX
Mike Dillon	Chemical Engineer 713-479-1541	" " " "
Don Masden	Product Training Supervisor 713-479-1541	" " "
John Hurst	Project Engineer 713-479-1541	" "
Bill Duncan	Construction Supervisor 713-479-1541	" "

90071894

Continued From Front

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

	1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
Past:	The Upjohn Co.	713-479-1541	P.O. Box 685, La Porte, TX	Sludge, solids, liquids
Present:	" "	" "	" "	Solid

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
Same as above			

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
resent:	Rollins Envr. Serv.	713-479-6001	2027 Battle ground Rd. Deer Park, TX
	Texas Ecologists, Inc.	512-387-3518	FM 69 mile south, Robstown, TX
	Chemical Waste Mgt.	713-736-2821	P.O. Box 2563 Port Arthur, TX
	BFI Chem. Serv.	318-527-6857	Hwy 397, Willow Spring, WestLake, LA.

G. DATE OF INSPECTION (mo., day, & yr.)	H. TIME OF INSPECTION	I. ACCESS GAINED BY: (credentials must be shown in all cases)
11-7-83	1300 hrs	[X] 1. PERMISSION [ ] 2. WARRANT

J. WEATHER (describe)
Sun, clear, 82°F

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
No measurements taken		

 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: Attached

E. COORDINATES

1. LATITUDE (deg.-min.-sec.): 29°42'40" N
2. LONGITUDE (deg.-min.-sec.): 95°04'43" W

V. SITE INFORMATION

A. SITE STATUS

[X] 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.) Prior to 1971

[ ] 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): 2865, 2869

C. AREA OF SITE (in acres)

.1 acre - Drum area
140 acres - Total site

D. ARE THERE BUILDINGS ON THE SITE?

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

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
						X	Past
	1. RAIL		1. PILE		1. FILTRATION	X	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		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 [X] 3. LANDFILL [ ] 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 some [X] 2. SOLID some [X] 3. SLUDGE mainly [ ] 4. GAS

B. WASTE CHARACTERISTICS

[ ] 1. CORROSIVE [ ] 2. IGNITABLE [ ] 3. RADIOACTIVE [X] 4. HIGHLY VOLATILE
[ ] 5. TOXIC [ ] 6. REACTIVE [ ] 7. INERT [ ] 8. FLAMMABLE
[X] 9. OTHER (specify): Reacts with water to become inert

C. WASTE CATEGORIES

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

Records were not available during inspection, however interviews were conducted with several individuals involved in the disposal practices of the past.

 Continue On Reverse

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: Unknown	AMOUNT: Unknown	AMOUNT: 88000-93000	AMOUNT: Unknown	AMOUNT: Unknown	AMOUNT: Unknown
UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE: gallons	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:
[ ] (1) PAINT, PIGMENTS	[X] (1) OILY WASTES	[ ] (1) HALOGENATED SOLVENTS	[ ] (1) ACIDS	[ ] (1) FLYASH	[ ] (1) LABORATORY, PHARMACEUT.
[ ] (2) METALS SLUDGES	[X] (2) OTHER (specify): Lube oil change oil	[ ] (2) NON-HALOGN'TD. SOLVENTS	[ ] (2) PICKLING LIQUORS	[ ] (2) ASBESTOS	[ ] (2) HOSPITAL
[ ] (3) POTW		[X] (3) OTHER (specify): Butyl isocyanate solvents, polymeric isocyanate.	[ ] (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') a. SOLID	b. LIQ.	c. VAPOR	3. TOXICITY (mark 'X') a. HIGH	b. MED.	c. LOW	d. NONE	4. CAS NUMBER	5. AMOUNT	6. UNIT
Butyl Isocyanate		X						111-36-4	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

The first water encountered in the Deer Park area could contact any leakage from the buried drums that may have occurred.

☐ G. CONTAMINATION OF SURFACE WATER

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

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

☒ U. OTHER (specify): Prior to and including 1964, approximately 5,000 drums of Butyl isocyanate residue and polymeric isocyanate were generated by the Upjohn company. Less than 1700 drums were buried on-site and the remaining 3300 drums were hauled off-site by local trash companies. A release was signed by the Upjohn company and Jack Arsenault was listed as one of the local trash hauling firms. Each drum was approximately half full and the solvents were distilled off, some plant trash was mixed with the Isocyanates. During construction of the present clarifier ponds these drums had to be relocated to their present site location. Four to six feet of soil was placed over the drums and clay was noted on the bottom and walls of the burial pit. It is believed that the drums are stacked two deep in most places, however, the number of drums placed in the hole is based solely on dimensional calculations. During the interview the Upjohn Company expressed the need to modify their present groundwater monitoring program for the plant to include the drum burial area.
It is therefore recommended that a groundwater monitoring system be established for the burial site and that the Upjohn company should be permitted to initiate the drilling program. If, within a reasonable time, no such groundwater program is established, a surface sampling and drilling program should be conducted to determine the extent and nature of material which may be leaving the burial site.

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	0	0	0	1 mile
2. IN COMMERCIAL OR INDUSTRIAL AREAS	2000	2000	50	1 mile
3. IN PUBLICLY TRAVELLED AREAS	500	500	5	1 mile
4. PUBLIC USE AREAS (parks, schools, etc.)	0	0	0	1 mile

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
10-12 ft.+ >1000 ft.*	SE+ S-SE*	Drinking/Industrial
D. POTENTIAL YIELD OF AQUIFER	**E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)**	**F. DIRECTION TO DRINKING WATER SUPPLY**
<10 gpm+ 2000 gpm*	≈200 ft.	North

G. TYPE OF DRINKING WATER SUPPLY

☒ 1. NON-COMMUNITY < 15 CONNECTIONS ☐ 2. COMMUNITY (specify town): > 15 CONNECTIONS Three 1000 ft. wells onsite-drinking industrial. surface water from CIWA-Industrial

☐ 3. SURFACE WATER ☒ 4. WELL

 Continue On Page 9

+ Shallow Aquifer ("First" Water")
* Major Aquifer (Gulf Coast Sands)
References: U.S.G.S. Professional Paper 813-F
T.W.D.B. Report 98 & 178.

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')
See attachments				

I. RECEIVING WATER

1. NAME: San Jacinto River

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

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

Noncontact recreation, propagation of fish & wildlife.

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				
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.) ☒ E. LOW (.1 to .001 cm/sec.) to ☒ 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: San Jacinto River

I. SLOPE

1. ESTIMATE % OF SLOPE: 0-1

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.: Relatively flat

J. OTHER GEOLOGICAL DATA

The site lies in the Beaumont formation which consists of clay, silt and sand. The soil borings conducted by the Upjohn company show that stiff brown and light gray unit of the Beaumont Formation lies directly beneath the site.

Continue On Reverse

Continued From Front

XIV. PERMIT INFORMATION

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

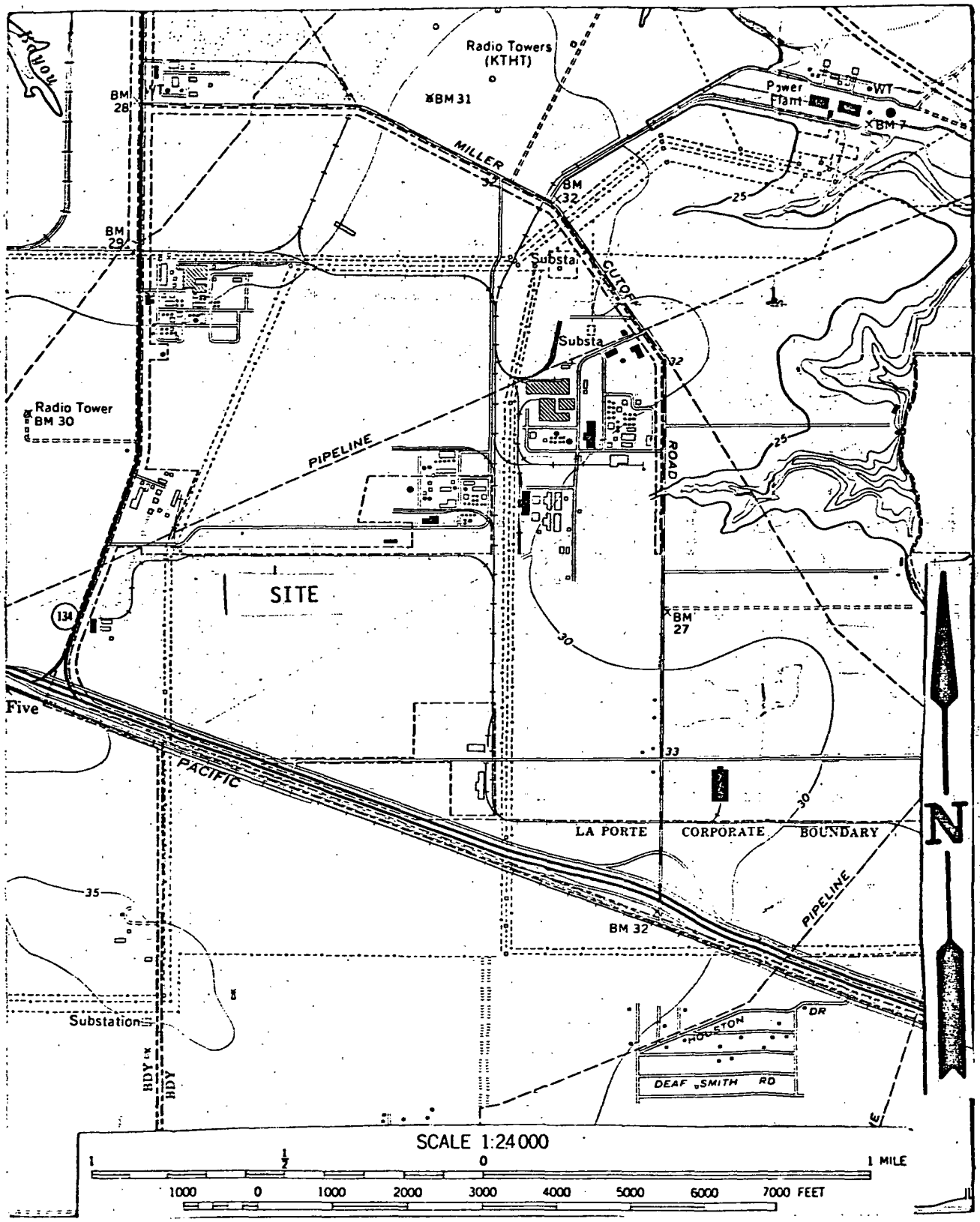
A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X') 1. YES	2. NO	3. UNKNOWN
Solid waste	TDWR	30464	-	-	X		
Wastewater	"	00663	-	-	X		
NPDES	EPA	0002933	-	-	X		
RCRA	EPA	000017756	-	-	X		
(See attachment)							

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

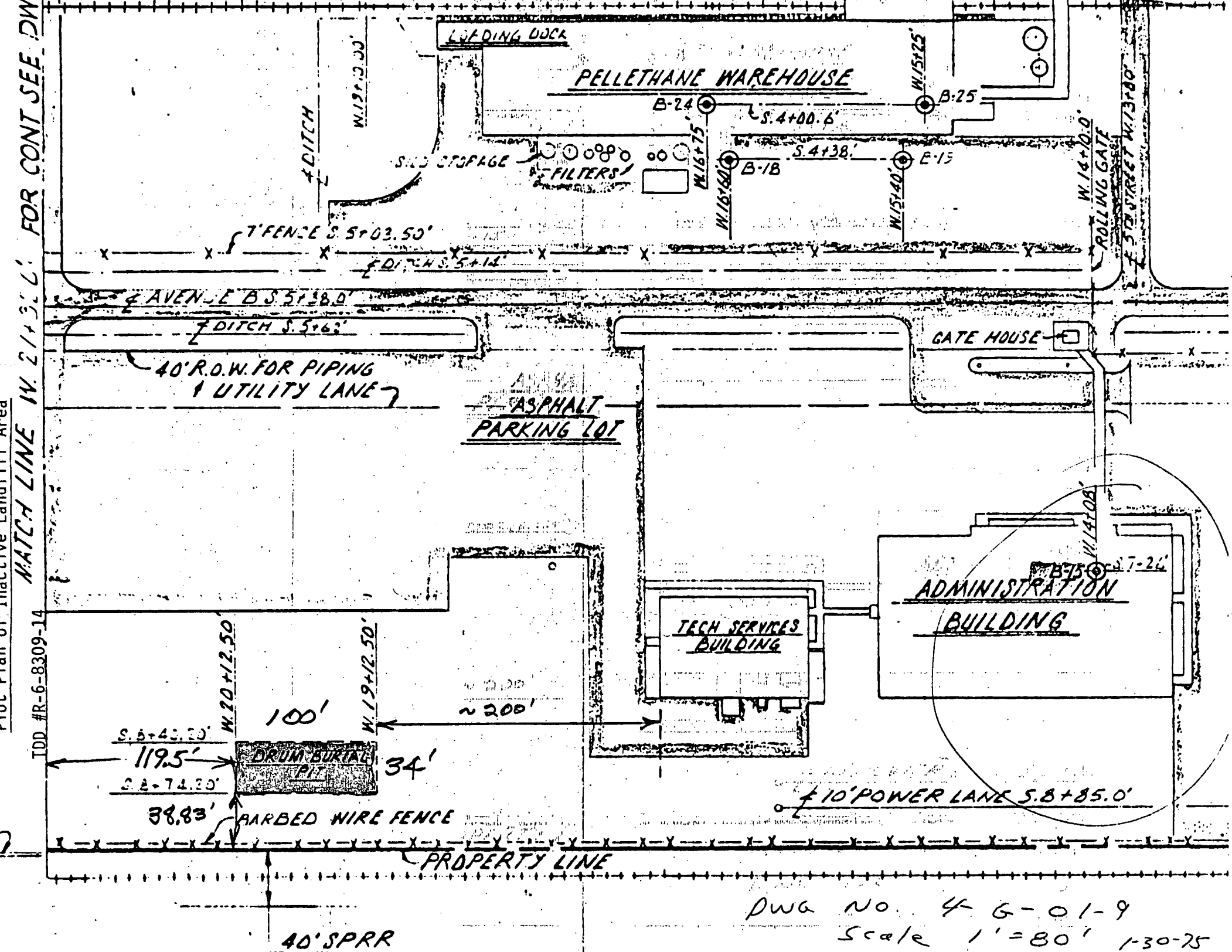
☐ NONE ☒ YES (summarize in this space)

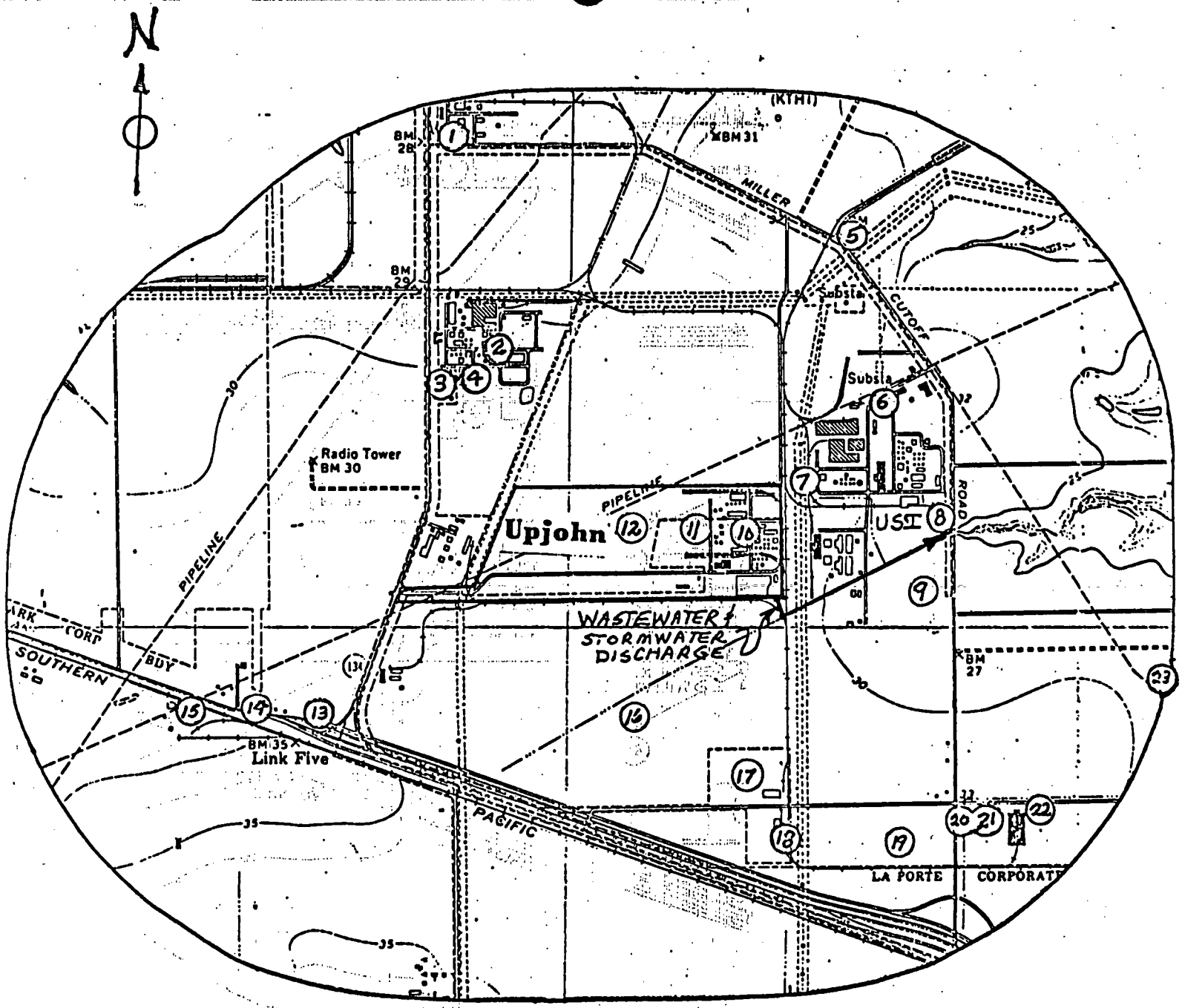
No regulatory or enforcement actions have been made at the inactive drum disposal area or other active solid waste disposal sites. The plant itself has incurred four "notice of violation" letters in the past 3 years and one which is still not resolved. An "Administrative order" was issued on the following dates.
October 14, 1976 for failure to submit report of progress and effluent violations.
October 11, 1977 effluent violations
April 11, 1978 " "
June 26, 1979 " "
October 26, 1981 unauthorized discharge of stormwater

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.



Location map for for the Upjohn Company, La Porte Texas (TX 11568) Taken from U.S.G.S. 7½ minute quadrangle (La porte - NW portion). TDD #R6-8309-14


LOADING DOCK
PELLETHANE WAREHOUSE
B-24
B-25
S.4+00.6'
S.4+38'
B-18
B-15
W.16+75'
W.16+60'
W.15+40'
W.15+25'
W.14+10.0'
ROLLING GATE
W.13+80'
SLUDGE STORAGE
FILTERS
DITCH
W.19+00.00'
7' FENCE S.5+03.50'
DITCH S.5+14'
AVENUE B S.5+38.0'
DITCH S.5+62'
GATE HOUSE
40' R.O.W. FOR PIPING & UTILITY LANE
ASPHALT PARKING LOT
MATCH LINE W. 21+32.6' FOR CONT SEE DWG
TECH SERVICES BUILDING
ADMINISTRATION BUILDING
B-7
S.7-26'
W.14+08'
W.20+12.50'
W.19+12.50'
100'
~200'
S.8+43.30'
119.5'
S.8+74.30'
DRUM BURIAL PIT
34'
38.83'
BARBED WIRE FENCE
10' POWER LANE S.8+85.0'
PROPERTY LINE
40' SPRR
TDD #R-6-8309-14
Plot Plan of Inactive Landfill Area
DWG NO. 4 G-01-9
Scale 1" = 80'
1-30-25



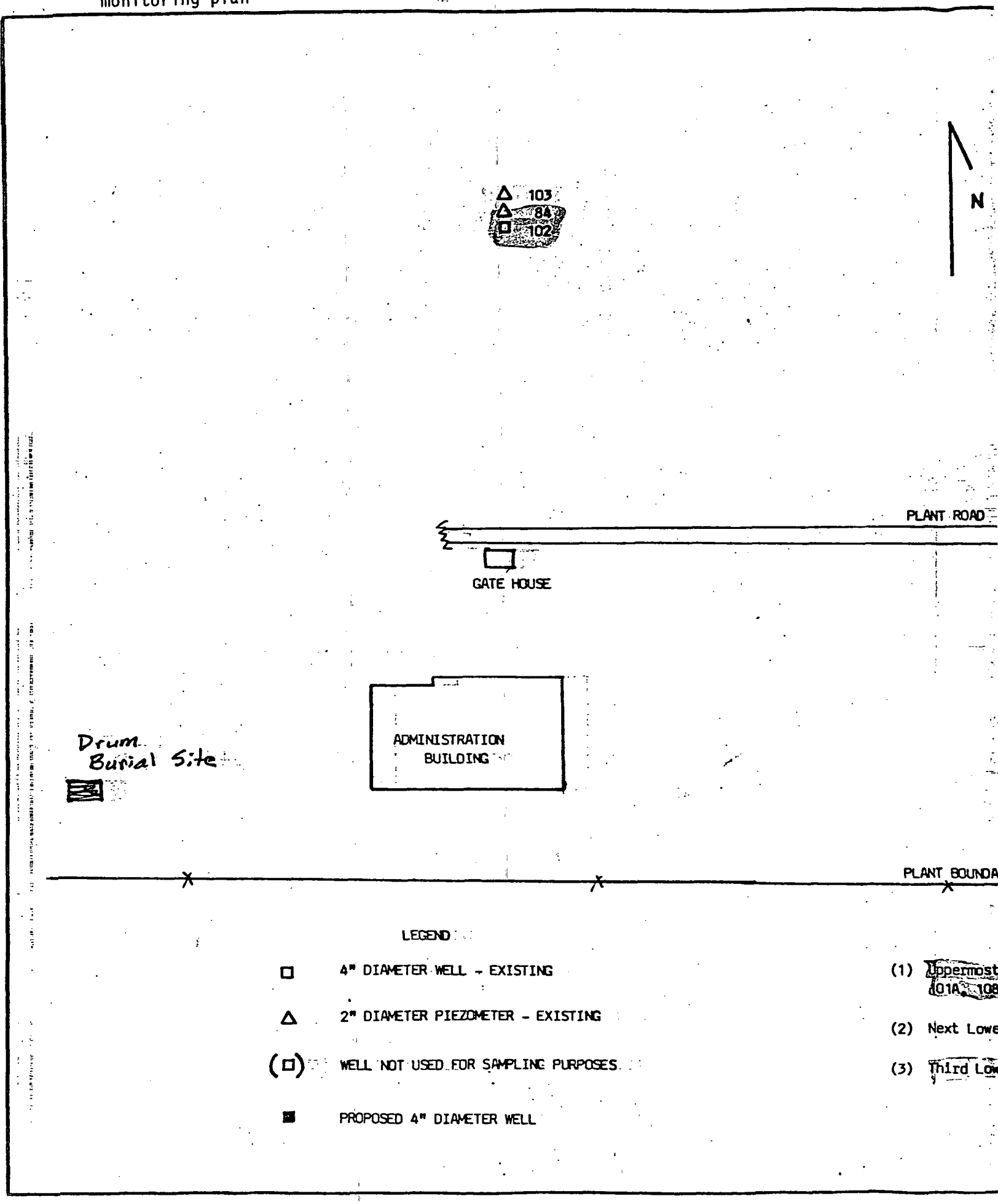
Hazardous waste management facilities are shown on the plot plan of the Upjohn site on Page E-3.

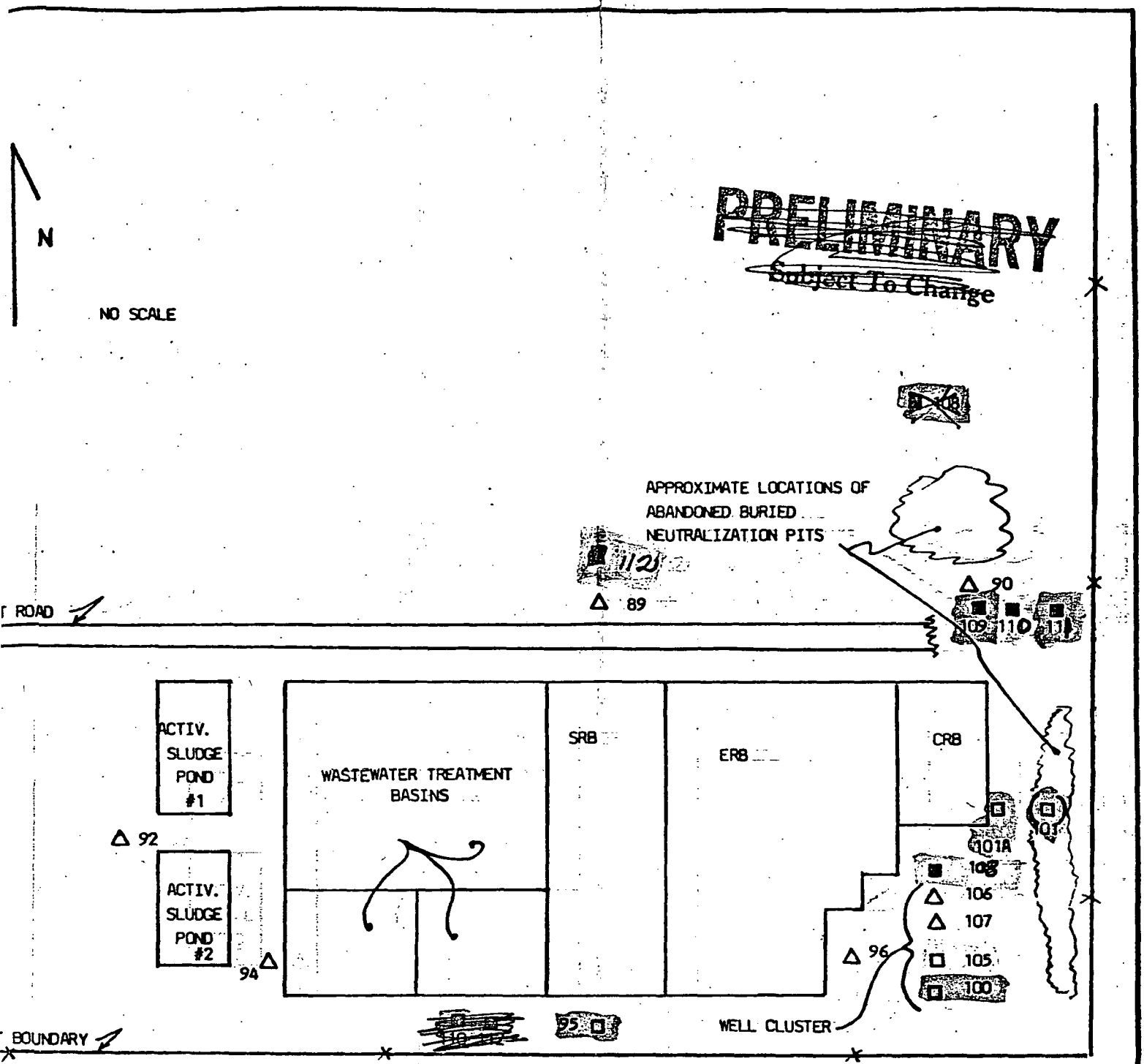
○ - Water Wells
Use and ownership is keyed to the list on Page E-2.

Water Well Use and Ownership

1	Industrial	Arco Polymer
2	Potable	Soltex Polymer Corp.
3	Potable	Soltex Polymer Corp.
4	Potable	Soltex Polymer Corp.
5	Potable	Houston Lighting and Power Co.
6	Industrial and Potable	U.S. Industrial Chemicals Co.
7	Industrial and Potable	U.S. Industrial Chemicals Co.
8	Industrial and Potable	U.S. Industrial Chemicals Co.
9	Industrial and Potable	U.S. Industrial Chemicals Co.
10	Potable	The Upjohn Co.
11	Potable	The Upjohn Co.
12	Potable	The Upjohn Co.
13	Industrial and Potable	Exxon
14	Potable	Sigmor
15	Industrial (2 wells)	Parker Bros.
16	Potable	U.S. Steel Novamont
17	Potable (2 wells)	Pearsall Chemical Corp.
18	Industrial	Southwest Chemical and Plastics Co.
19	Industrial (2 wells)	Air Products and Chemicals Inc.
20	Potable	Drago Supply Co., Inc.
21	Potable	Greif Brothers Cooperage Co.
22	Industrial and Potable	Southwest Chemical and Plastics Co.
23	Potable	Syngas Co.

Well location for groundwater monitoring plan





NOTES:

permost Aquifer Wells: 102, 95, 100, (101), 01A, 108, 109, 110

xt Lower Aquifer Wells: 105, 111, 112

ird Lower Aquifer Wells: 113, 114

(97 △)

GEO ASSOCIATES

Geotechnical Engineering & Groundwater Hydrology

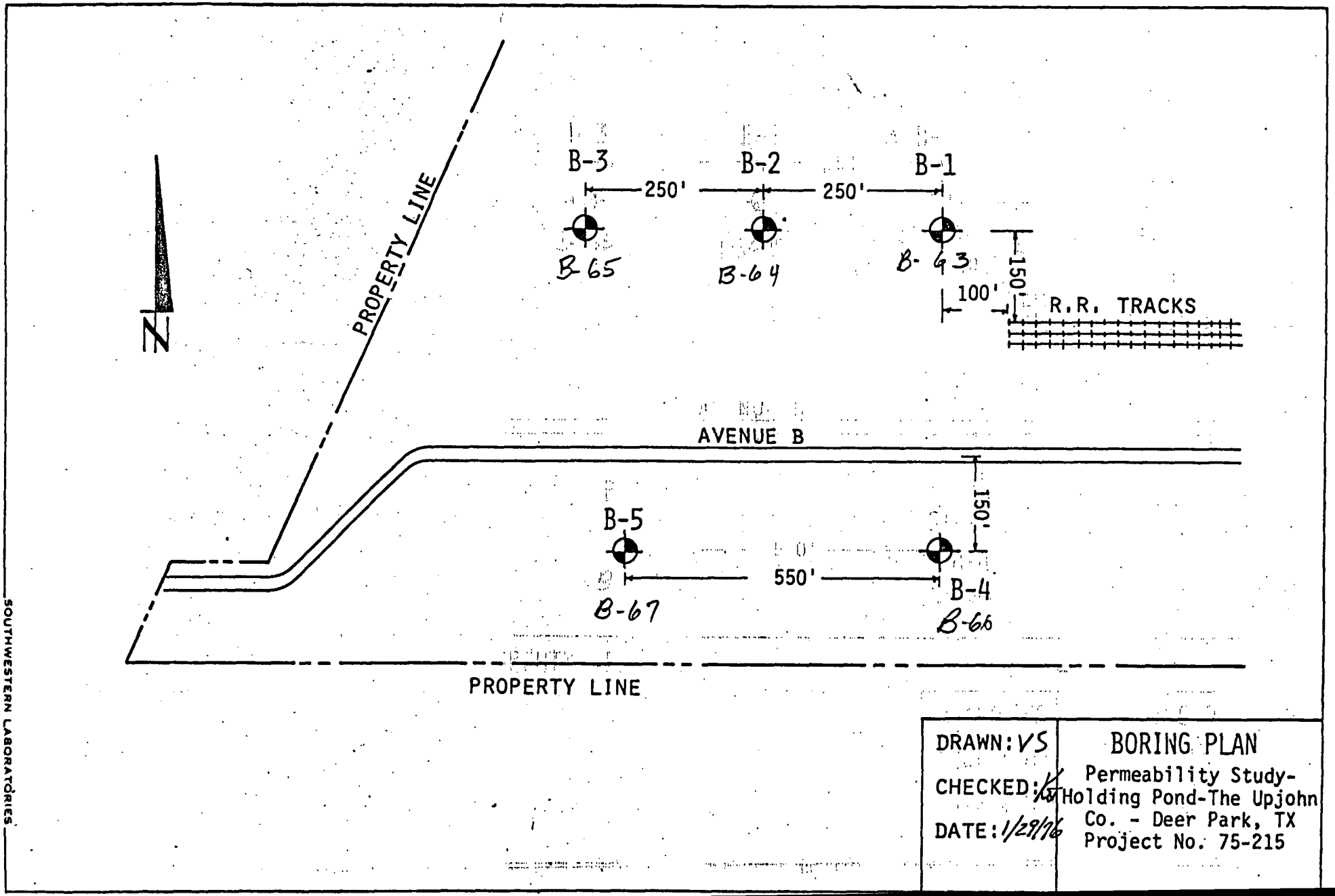
LOCATIONS OF PROPOSED WELLS

THE UPJOHN CO. - POLYMER CHEMICALS DIVISION
LA PORTE, TX

NO.	DATE	EXHIBIT NUMBER
022	July 1983	Figure 2

Soil Boring location map

Attachment XIII.J.



LOG OF BORING B-4

PROJECT: Permeability Study - Holding Pond, The Upjohn Company, Deer Park, Texas
Project No. 75-215

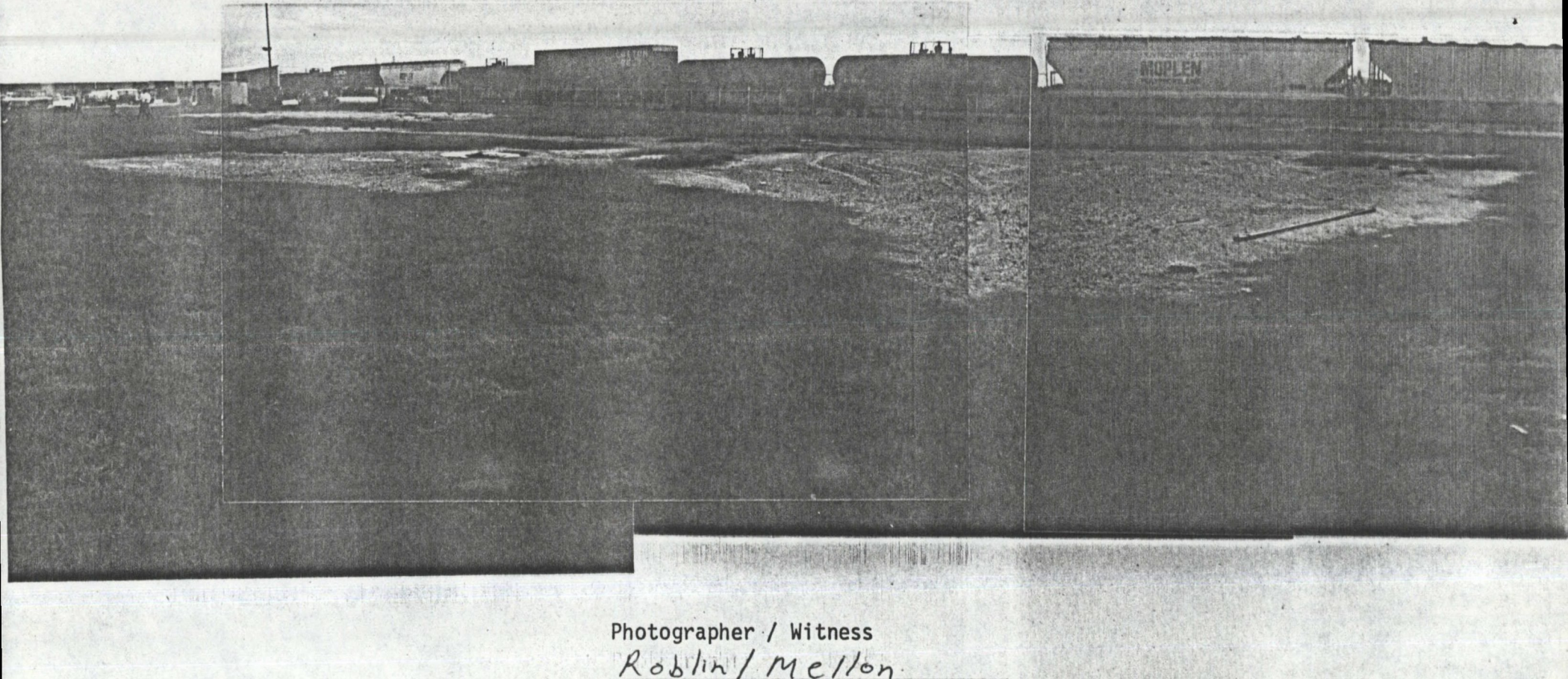
DATE: 12-23-75 TYPE: Soil Test Boring LOCATION: See Boring Plan

▼ WATER | SAMPLE | STANDARD PENETRATION

DEPTH, FEET	SYMBOL	SAMPLES	BLOWS PER FT.	DESCRIPTION
				SURFACE ELEVATION: Existing grade
0				Plastic gray clay with grass at surface - color change to light gray and tan at 2 feet - very calcareous at 4 feet
5				Stiff brown and light gray clay with silt stones and calcareous nodules - very silty at 8 feet
10				
15				
20				Boring Terminated at 20 feet

Relevant Program and/or Law (Continued from Page 3)

		Permit No.	Government Agency
d.	Texas Clean Air Act	R-1184	TACB
		R-1205	TACB
		R-1205A	TACB
		R-1206	TACB
		R-1460	TACB
		R-1483A	TACB
		R-1501	TACB
		R-1737	TACB
		R-4221	TACB
		R-5575	TACB
		R-5835	TACB
		R-6181	TACB
		R-6242	TACB
		R-6793	TACB



Photographer / Witness

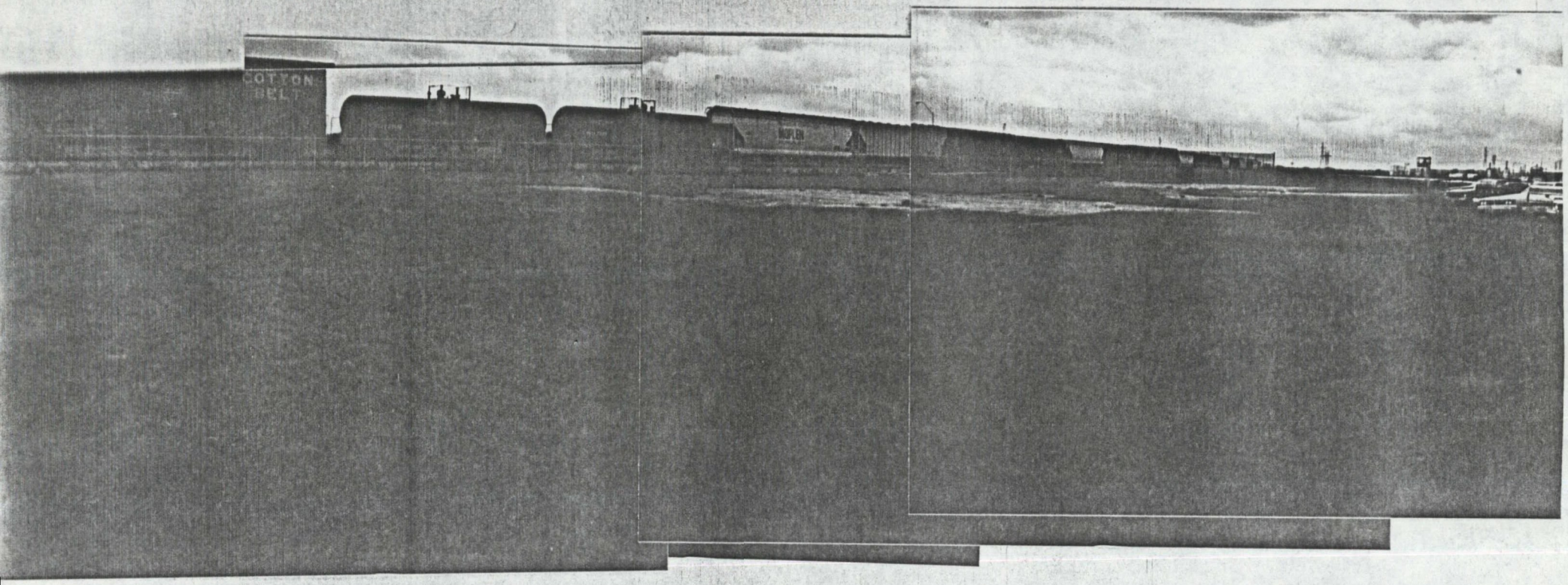
Roblin / Mellon

Date / Time / Direction

11-7-83 / 1455 hrs. / E to SW

Comments:

Staining approximates area of drum burial site. Note close proximity to property boundary (Railroad tracks). Site Photographs #1, 2, 3 & 4.



Photographer / Witness

Roblin / Mellon

Date / Time / Direction

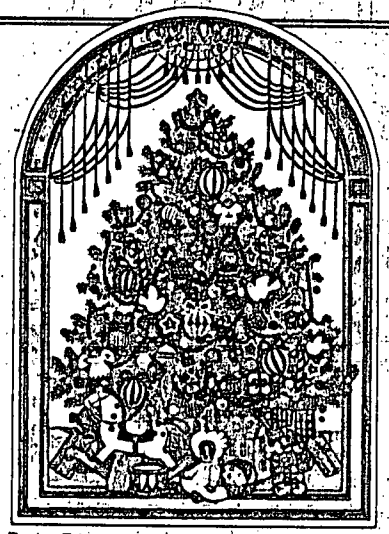
11-7-83 / 1500 hrs. / SE to W

Comments:

View of drum burial site.
Note close proximity to
offices (parked cars in lot).
Site Photographs #5, 6, 7 & 8.

TDHR 6-8279-15

Photo Greeting Cards



Design F-1

PUT MORE OF YOURSELF INTO HOLIDAY GREETINGS.

Send your family and friends holiday cards they'll cherish long after the season ends. Send Fox Photo greeting cards with the personal touch of a color photo from Fox.

12 FOR $4.97

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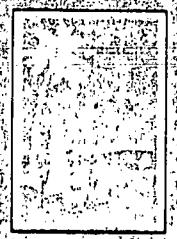
Design F-2



Design F-3

Design F-4

TDD# R6-8309-14

Photographer / Witness

Roblin / Mellon

Date / Time / Direction

11-7-83 / 1455-1500hrs / 360°

Comments:

Negatives

United States
Environmental Protection
Agency

Region 6
1201 Elm Street
Dallas, TX 75270

Arkansas, Louisiana,
Oklahoma, Texas,
New Mexico

EPA

11-7-83
1412

(Date)

Steve Mellon (FIT)
(Name & Title of EPA Representative)

Steven A. Mellon
(Signature)

Description of Documents Collected

(Description of letters should include the date and names of addressee and sender; description of records should include title, date, and if signed, the name of person signing.)

1) Map 8½ x 11 showing water wells (1 mile radius) on and around site

2) list of water well use & ownership

3) Texas clean air permit numbers

4) Generalized site map - Drawing # 4-6-01-9
Scale 1" = 80 (1" = 75)

5) Boring Loc - Holding Pond

6) Map locating monitoring wells

7) Boring Plan - Holding Pond

Acknowledgement of Facility Representative

The undersigned acknowledges that copies of the documents described above have been collected.

B.W. Ryan, Environmental Supervisor
(Name & Title of Facility Representative)

B.W. Ryan
(Signature)

Upjohn Co. - Polymer Chemicals Division
(Facility Name and Address)

DISTRIBUTION: One copy to Facility Representative
One copy for Inspector's Records
Original to Regional Office (6ASASC)