Date: November 9, 2015
Subject: Malone Service Company, Texas City, Galveston County, Texas
From: Warren Zehner, OSC, U.S. EPA, Region VI ERB (281/983-2229); David Abshire, FOSCR, U.S. EPA, Region VI Remedial (214/665-7188)
To: Director, OERR
**********, RPB, EPA Region 6**
State Contact: Texas Commission on Environmental Quality (TCEQ)

POLREP NO.: 53
Event: Emergency Removal Action
Site SID No.: TXD980864789
Start Date: July 6, 2015
Demobilization Date: NA
Completion Date: NA
Site Type: Fixed Facility
Site latitude/Longitude: Lat: 29^0 19' 59" N Long: 94^0 54' 10" W

I. SITUATION

The Malone Service Company Superfund Site is a former commercial waste disposal facility located at 800 Campbell Bayou Road, Texas City, Galveston County, Texas. The former waste processing, storage and disposal facility is approximately 150-acres on the mainland shore of Galveston Bay in Texas City, Galveston County, Texas. The former facility is located in marsh/wetlands area, and surrounded by an approximate 18-foot high flood protection levee. The facility operated from 1964 to 1997 when its hazardous waste sotrage and disposal permits were revoked by the Texas Natural Resource Conservatin Commission (TNRCC - presently called the Texas Commission on Environmental Quality). The former faciltiy managed a wide range of hazardous and non-hazardous waste streams generated at off-site locations by the chemical, petroleum, petrochemical, plating, pesticide, and other industries. The facility operated two (2) hazardous waste disposal well – WDW-138 and WDW-73. Onsite stormwater, potentially mixed with hazardous substances from leaking thanks, surface impoundments, and contaminated soil, was disposed in the two (2) underground hazardous waste injection wells located on-site. In May 1999, the last operational injection well failed, leaving no viable alternative for contaminated stormwater management.

The former facility came under the authority of the Superfund Program in 1998. Due to potential contaminated stormwater releases the Superfund Removal Program conducted a well workover on WDW-138 to manage the contaminated stormwater. The Potentially Responsible Parties (PRPs) assumed stormwater management activities in 2004. Presently, cleanup of the contaminated areas within the former facility is being addressed through a Remedial Action conducted by the Potentially Responsible Parties (PRPs).

One of the hazardous waste injection wells, WDW-138, has been used by Superfund Removal Program (1998 – 2004) and the Potentially Responsible Parties (PRPs - 2004–6/16/15) under Superfund Remedial Program oversight (following all substantive requirements of the EPA Underground Injection Control (UIC) No-migration Petition and the Texas Commission on Environmental Quality [TCEQ] permit) for disposal of storm water that accumulates in the contaminated Solid Waste Management Units (SWMUs). The EPA UIC No-migration Petition, which permitted disposal of contaminated water through

deep well injection expired on June 16, 2015; therefore, the PRPs were required to cease injection operations. Therefore, to continue management of contaminated stormwater and prevent releases, the Superfund Program Remedial Branch requested, and received approval to continue stormwater management through Removal's Emergency Response.

II. ACTIONS TAKEN

The on-site hazardous waste injection wells WDW-138 and WDW-73 are being used by the Superfund Removal Program to address the contaminated water in the SWMUs; the Removal Program used WDW-138 from 1999 to 2004 to address stromwater. An emergency response to address the potential release of contaminants from the SWMUs is warranted because the authorization to use the on-site injection wells under the UIC No-migration Petition has expired. The Units are being pumped down to prevent releases and to maintain more storage capacity for any additional storms during the hurricane season in this hurricane prone area. The pump-down is in accordance with the requirements of the approved Malone Service Company Superfund Site Storm Water Management Plan (March 11, 2014) and all substantive requirements of the EPA UIC No-migration Petition and the TCEQ permit.

EPA resumed control of the facility injection wells from the PRPs on July 6, 2015. Currently, EPA is conducting emergency pump down operations of the contaminated stormwater and other contaminated water from various units on the site. Freeboard levels become critical following storm events. The Site received 0.5 inches of rain this reporting period, allowing portions of the RA construction to continue. There remains approximately 4.5 million gallons to inject, which will require injection for approximately 6 weeks at the current injection rate. The PRPs have approximately 13.5-acres of open excavations which receive stormwater, which is approximately 710,000 gallons for a 2-inch rain event. The temporary stormwater storage impoundments cannot be at capacity because the injection wells cannot inject at a rate to manage only a 2-inch rain event; there has to be a balance between storage capacity, storm event and injection rate/volume.

Both injection wells (WDW-138 and WDW-73) are operational, but do have mechanical issues most weeks. WDW-138 injected on a 24 hour period from November 2, through November 6; WDW-73 injected during working hours. From November 2 through November 8, 2015, approximately 681,938 gallons have been disposed from Site units. Both wells have injected a total volume of 6,290,732 gallons since emergency response began.

III. FUTURE PLANS

Continue injection operations to address potential releases and maximize storage capacity for potential storm events.

IV. KEY ISSUES

None

V. DISPOSITION OF WASTE

VI. ATTACHMENTS

None