

# Phase I Environmental Site Assessment

Approximately 183 Acres Along I-10 Southwest of Major Drive (South side), Beaumont, Jefferson County, Texas  
77705

June 27, 2018

**PEI Project No.: 201806054**



## Prepared for:

Parigi Property Management  
445 N. 14th Street  
Beaumont, Texas 77702

## Prepared by:

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Houston, Texas 77007



Established in 1993

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Site Assessments

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# 1.0 Executive Summary

## 1.1 Site Summary

SITE SUMMARY	
Site Element	Comments
Subject Property Address	Approximately 183 Acres Along I-10 Southwest of Major Drive (South side), Beaumont, Jefferson County, Texas 77705
Current Use of Subject Property	Undeveloped Land
Legal Description	H.T. & B. Railroad Survey, Abstract 145, Tracts 1-2, Undivided 1/2 INT (per tax records)
Current Owner	Wesley B and Virginia Whitmeyer Bolton
Current Uses of Adjoining Properties:	<p>Northeast: Western Star Feightliner, Hidden Lake RV Park and an electric sub-station</p> <p>Southeast: Fannet Road (TX 124), railroad tracks, Robinsons RV Park, undeveloped land, Eddies Automotive (not in service), single-family residential properties and Wheatons Plaza</p> <p>Southwest: Doguets Rice Milling Company (not in service), AZZ Galvanizing and undeveloped land</p> <p>Northwest: Interstate Highway 10 and associated service roads and undeveloped land</p>
Site Reconnaissance Date	June 21, 2018
Physical Setting	
Topography	Elevation: Approximately 19 to 21 feet above mean sea level (msl) General Area Topographic Downgradient: Southeast
Groundwater Flow Direction	Assumed to be consistent with topographic gradient (See Section 5.3 for more information)
Depth to Groundwater	Approximately 10 to 25 feet below ground surface (bgs)
Sub-Surface Geology	Beaumont Formation (Qb-stippled)
Underlying Aquifer(s)	Gulf Coast Aquifer
Near Surface Soils	China Clay (ChiA), China-Urban land complex, 0 to 1 percent slopes (ChoA) and Urban Land (URLX)

Historical Use Subject Property							
Year Range	Property Use(s)	Aerial Photos	Topo Maps	Fire Insurance Maps	Street Directories	Interviews	Regulatory Files / Prior Reports
Late-1930s - 1970s	Rural residential property and undeveloped and agricultural land	✓	✓				
1970s - 2018	Undeveloped and agricultural land	✓	✓			✓	

Historical Use Adjoining Properties	
Direction	Historical Use Description
Northeast Adjoining Property	Commercial truck dealership, RV park, electric sub-station, single-family residential property and undeveloped and agricultural land
Southeast Adjoining Property	Fannet Road (TX 124), railroad tracks, RV park, automotive repair shop, retail center (no environmentally sensitive businesses), single-family residential property and undeveloped and agricultural land
Southwest Adjoining Property	Rice mill, galvanizing facility and undeveloped and agricultural land
Northwest Adjoining Property	Interstate Highway 10 and associated service roads and undeveloped and agricultural land

## 1.2 Project Summary

ASTM Standard Considerations						
Report Section	No Further Action	REC	CREC	HREC	Other Environmental Considerations	Suggested Action
1.0 Current Use of Subject Property	✓					
1.0 Current Use of Adjoining Properties		✓				Phase II ESA
4.0 User Provided Information	✓					
5.1 Standard Environmental Record Sources		✓				Phase II ESA
5.4.1 Historical Information on Subject Property	✓					
5.4.3 Historical Information on Adjoining Properties		✓				Phase II ESA
6.0 Site Reconnaissance	✓					
7.0 Interviews	✓					

Non-ASTM Scope Considerations						
Report Section	No Further Action	REC	CREC	HREC	Other Environmental Considerations	Suggested Action
14.5 Endangered Species	✓					
14.14 Wetlands					✓	Formal Wetlands Determination

## 1.2.1 Data Gap Summary

A data gap is a lack of or inability to obtain information required by ASTM Practice E1527-13 despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.).

The following table summarizes general areas of the report that may encounter data gaps during the assessment process.

Report Element	Report Section	Data Gap	Description of Data Gap	Significant
<b>User Responsibilities</b>				
Completion of User Questionnaire	4.1	Yes	URQ not returned.	No
Land Title / Deed Records	5.4.1.4	N/A		
<b>Regulatory Agency Records</b>				
Standard Federal, State, Tribal and Local Records Review	5.1	No		
Additional Federal, State, Tribal and Local Records Review	5.2	No		
<b>Historical Sources</b>				
Aerial Photographs	5.4.1.1	No		
Fire Insurance Rate Maps	5.4.1.2	N/A		
Property Tax Records	5.4.1.3	No		
Land Title Records	5.4.1.4	N/A		
Topographic Maps	5.4.1.5	No		
Street Directories	5.4.1.6	No		
Other Historical Records	5.4.1.7	No		
Historical Use of Subject Property	5.4.2	No		
Historical Use of Adjoining Properties	5.4.3	No		
<b>Site Reconnaissance</b>				
Observations of Subject Property	6.0	No		
Observation of Surrounding Properties	6.0	No		
<b>Interviews</b>				
Current Owner	7.1	Yes	No property owner information provided.	No

Report Element	Report Section	Data Gap	Description of Data Gap	Significant
Key Property Manager	7.1	Yes	No property manager information provided.	No
Occupant(s)	7.1	N/A		
Past Owners / Managers / Occupants	7.1	N/A		
Adjoining Property Owners / Occupants	7.1	N/A		
State / Local Health/ Environmental Department	7.2	Yes	Public information response has not been received.	No
Local Fire Department	7.2	Yes	Public information response has not been received.	No
Local Building Permit / Inspection Department	7.2	Yes	Public information response has not been received.	No
Local Planning / Zoning Department	7.2	No		
Local Water Utility Company	7.2	N/A		

### 1.3 Findings and Opinions

Summary of Critical Identified Sites
<p>The property located approximately 0.18 mile southeast of the subject property across Interstate Highway 10, addressed as 5898 Industrial Road under the name International Galvanizers, is a RCRA generator of hazardous wastes, an IHW registration and reporting facility and an IHW corrective action facility.</p> <ul style="list-style-type: none"> <li>• RCRA violations were noted at this facility by the Environmental Protection Agency (EPA) between January and June 2017.</li> <li>• This facility has an IHW status of "Active". Compliance investigations were conducted at this facility in February 2005, May 2005, May 2006, November 2006, July 2007, June 2010 and March 2017 and a compliance investigation file review was conducted in August 2017. Violations were noted at this facility in May 2017 for failure to properly maintain all facility operation and inspection related documentation and failure to identify the location of all container storage areas. Waste Management Units (WMUs) listed for this facility consist of a container storage area, miscellaneous storage containers, a spent acid storage tank, a wastewater sump with closure pending and two surface impoundments with a status of "Closed". Wastes listed for this facility include stabilized solids from hot dip galvanizing, waste oil, spent acid from steel pickling, spent sodium hydroxide, molten zinc kettle skimmings and bottoms, spent metal treatment solution, used oil filters, galvanizing process sludge, plant trash and used air filters. A complete list of wastes generated by this facility is located in the attached appendix.</li> <li>• A leaking process tank at this facility caused a solution of acids and RCRA regulated metals to be released to soils around an emergency overflow sump in 1996. Corrective action investigation activities were conducted at this facility from November 1996 to December 1997</li> </ul>



### Summary of Critical Identified Sites

in order to determine the extent of impact near the overflow sump. A deed recordation was made at this facility documenting impacted soil near the overflow sump affected with elevated concentrations of RCRA regulated metals. No information is available to determine the northernmost extent of sub-surface impact from metals. No groundwater investigation activities were documented in association with soil investigation activities at this facility.

Historical documentation and the site visit indicate that this facility continued to operate as a galvanizing facility from the cessation of investigation activities to the present (approximately 20 years).

Phase Engineering, Inc. has the opinion that, based on the undetermined extent of impact at this facility and continued operations over an extended period of time, the subject property may have been impacted by a hazardous substance release at this facility.

The southeast adjoining property across Fannett Road, addressed as Fannett Road under the name Former Service Station, is listed as a LPST site. This facility is mis-plotted at its current location, and is actually located several miles to the northeast at a vacant lot adjoining to the west of 3755 Fannett Road, Beaumont, Texas 77705. Phase Engineering, Inc. has the opinion that, based on distance, the subject property does not appear to have been impacted by this facility.

The property located approximately 0.15 mile northeast of the subject property, addressed as 6810 South Major Drive under the names Baker Oil Tools and Exxonmobil Pipeline Company – Beaumont Office, is an unmapped RCRA generator of hazardous wastes, an IHW registration and reporting facility and a registered UST facility.

- There are no RCRA violations on file for this facility with the Environmental Protection Agency (EPA).
- This facility has an IHW status of "Active" and is not undergoing corrective action. Waste Management Units (WMUs) listed for this facility consist of a container storage area. Wastes listed for this facility include degreaser solution.
- A 3,000 gallon UST was reported to have been installed at this facility in the mid to early-1980s and was removed from the ground prior to August 31, 1987. The UST is not listed as leaking with the TCEQ. No documentation is available to determine the status of the UST or any release determination activities possibly conducted at the time of UST removal.

Historical documentation indicates that operational areas at this facility were located more than 650 feet from the boundary of the subject property. Phase Engineering, Inc. has the opinion that, based on lack of reported releases and distance from operational areas, the subject property does not appear to have been impacted by this facility.

None of the remaining sites listed on the database are the subject property or an adjoining property. There is no indication that the sites identified in the ASTM Standard Environmental Record Sources search have had or will have an environmental impact to the subject property. Phase Engineering, Inc. has the opinion that, based on distance, direction, status or other justifications, it does not appear the subject property has been impacted from these remaining facilities.

### Summary of Environmental Concerns Identified During Historical and Other Records Review

Historically, the subject property was agricultural land. Past use as agricultural land may have involved the storage and usage of pesticides, insecticides, herbicides, fungicides, fertilizers and / or other agricultural chemicals. No structures or areas that may have been utilized for storage or loading of these products were noted on historical information reviewed, interviews or during the site visit. These products are not considered a recognized environmental condition per Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) provided they were legally stored, processed and

**Summary of Environmental Concerns Identified During Historical and Other Records Review**

/ or applied. Agricultural chemicals that may have been previously stored and / or applied at the subject property would likely have degraded due to surface runoff or atmospheric exposure since the subject property was last utilized for agricultural purposes. Additionally, contact to potentially remaining agricultural residual products would likely be limited during future anticipated development activities including import of engineered fill material and construction of onsite structures. Phase Engineering, Inc. has the opinion that based on lack of former onsite structures that may have potentially been utilized for storage or loading of agricultural chemicals and length of time since the subject property was utilized for agricultural purposes, it does not appear past use as agricultural land has impacted the subject property.

The Texas Railroad Commission (RRC) map shows a crude oil pipeline traversing the south portion of the subject property, butadiene and natural gas pipelines located along the southeast boundary of the subject property and butadiene, propane and propylene polymer pipelines located near the southeast corner of the subject property. Historical topographic maps show indications of the onsite crude oil pipeline. No evidence of impact to the subject property was identified in association with the pipelines from historical documentation, regulatory agency records or other sources. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.

Historical aerial photographs and topographic maps indicate that railroad tracks were located along the southeast boundary of the subject property from the late-1930s to the 2010s and along the southwest boundary of the subject property from the 1970s to the 2010s. The railroad tracks were observed during the site visit. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.

Historical street directories indicate that the northeast adjoining property, addressed as 7390 IH-10, was occupied by a truck dealership during the 2010s. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.

Historical street directories and aerial photographs indicate that the southwest adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility from the late-1970s to the 2010s. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.

**Summary of Critical Observed Areas of Environmental Concern**

The south adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility at the time of the site visit. Aboveground storage tanks, drums and assorted containers of unknown contents were observed located at this facility. No indications of a release were observed in association with these features. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.

The following facilities of potential environmental concern were observed at adjoining properties at the time of the site visit:

- The northeast adjoining property, addressed as 7390 IH-10, was occupied by a commercial truck dealership and service facility.
- The southeast adjoining property across Fannett Road was occupied by an out of service automotive repair shop.

Automotive repair and service facilities are known to store, use and dispose of hazardous substances and petroleum products possibly including degreaser solvents, oil, hydraulic oil, lubricants, gasoline and diesel. No indications of a release were identified in association with these facilities from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by these facilities.

**Summary of Critical Observed Areas of Environmental Concern**

Mounds of rice hulls from former rice milling activities were observed located at the south adjoining property. No indications of a release were identified in association with the mounds. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the mounds of rice hulls.

Markers for natural gas and petroleum product pipelines were observed located along the southeast and south boundaries of the subject property. No indications of a release were identified in association with the pipelines from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.

Railroad tracks were observed located along the southeast boundary of the subject property and a railroad spur was observed located along the south property boundary. No indications of a release were identified in association with the railroad tracks from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the railroad tracks.

**Summary of Environmental Concerns Noted During Interviews / Inquiries**

No environmental concerns were identified in association with interviews and inquiries conducted for this assessment.

## 1.4 Conclusions

Phase Engineering, Inc. has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of subject property and more fully described within the report. Any exception to, or deletions from, this practice are described in Section 2.0 of the report.

**RECs**

**Recognized Environmental Conditions**

Recognized environmental condition is defined in ASTM Standard E 1527-13 as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” Phase Engineering, Inc. has considered all migration pathways including soil, groundwater and vapor during evaluation of all identified environmental conditions. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

- Indication of potential impact to the subject property as a result of past hazardous substance release(s) from long term operation and IHW corrective action related impact at the southwest adjoining galvanizing facility.

**CRECs**

**Controlled Recognized Environmental Conditions**

A controlled recognized environmental condition (CREC) is defined in ASTM Standard E 1527-13 as “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.” Controlled recognized environmental conditions are recognized environmental conditions. This assessment has revealed no evidence of controlled recognized environmental conditions in connection with the property.

<b>HRECs</b>
<b>Historical Recognized Environmental Conditions</b>
<p>A historical recognized environmental condition (HREC) is defined in ASTM Standard E 1527-13 as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.” A historical recognized environmental condition is not a recognized environmental condition. This assessment has revealed no evidence of historical recognized environmental conditions in connection with the property.</p>

<b>De minimis Conditions</b>
<b>De minimis Conditions</b>
<p><i>De minimis</i> conditions are defined in ASTM Standard E 1527-13 as conditions “that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.” <i>De minimis</i> conditions are not recognized environmental conditions. This assessment has revealed no evidence of <i>de minimis</i> conditions in connection with the property.</p>

## 1.5 Recommendations

<b>Recommendations</b>
<p>The following recommendation is made with respect to the environmental aspects of the subject property:</p> <p>A Phase II Environmental Site Assessment is recommended to investigate the potential soil, groundwater and vapor impact due to the identified recognized environmental condition(s).</p>

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## **2.0 Introduction**

### **2.1 Purpose of Assignment**

The purpose of this assignment is to prepare a Phase I Environmental Site Assessment Report of the subject property and more fully described in this report; to conduct All Appropriate Inquiry as defined in EPA 40 CFR Part 312, to permit the user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended in 2002; and to identify, to the extent feasible pursuant to the processes prescribed in ASTM Standard E 1527-13 recognized environmental conditions in connection with the subject property. All migration pathways and environmental media (i.e. soil, groundwater, vapor) are considered in the determination of recognized environmental conditions.

### **2.2 Scope of Work**

The Phase I Environmental Site Assessment was prepared in accordance with the ASTM Standard Practice E 1527-13 for Environmental Site Assessments and the EPA Rule on All Appropriate Inquiries and within any additional limitations and deviations noted in the report. The general scope of work includes:

- Interviews with past and present owners, operators and occupants;
- Interviews with local government officials;
- Review of historical sources of information;
- Review of federal, state, tribal and local government records;
- Visual inspections of the property and adjoining properties;
- Preparation of report.

The Phase I Environmental Site Assessment does not include:

- Soil, groundwater, or building material sampling;
- Chain of title or environmental lien search;
- Any non-scope considerations, unless specifically contracted for, as listed in the ASTM Standard E 1527-13 Sections 13.1.5.1 through 13.1.5.14 (see Section 14 of this report).

### **2.3 Significant Assumptions**

Phase Engineering, Inc. assumes there are no hidden or unapparent environmental conditions of the property, subsoil, groundwater, structures or surroundings which would have an adverse effect on the property. Phase Engineering, Inc. assumes no responsibility for such conditions or for engineering or inspections which might be required to discover such conditions.

Record and interview information furnished to Phase Engineering, Inc., and contained in the report, were obtained from sources assumed to be reliable and believed to be true and correct. However, Phase Engineering, Inc. assumes no responsibility for any inaccuracies in such items which may be revealed as a result of subsequent action, either by Phase Engineering, Inc. or others. Accuracy or completeness of record information varies among information sources, including governmental sources. Record information is often inaccurate or incomplete. Numerous sites are considered unmapped because the federal or state

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databases do not adequately define the address and/or location to properly plot the site using standard geo-coding processes. Unmapped sites are generally reviewed using a zip code and street name search. Phase Engineering, Inc. is not obligated to identify mistakes or insufficiencies in information provided. Phase Engineering, Inc. will make a reasonable effort to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which Phase Engineering, Inc. has actual knowledge at the time of preparation of the report.

Groundwater flow is assumed to be in the direction of surface topography unless otherwise noted in the report.

## **2.4 Limitations and Exceptions of Assessment**

This report is prepared in general accordance to the ASTM Standard Practice for Environmental Site Assessments in accordance with Standard E 1527-13. No non-scope items as noted in the ASTM Standards of Practice taken into consideration, except as noted.

The findings and conclusions of this report are based on Phase Engineering, Inc. professional opinions of the environmental conditions identified using the methodology described in ASTM Standard E 1527-13. If greater certainty is desired by the user of the report, further investigation beyond the scope of the ASTM Standard E 1527-13 may be necessary.

Phase Engineering, Inc. has estimated neither the cost of the impact on the property nor the costs necessary to eliminate the recognized environmental conditions.

The report was limited to information concerning the observed physical characteristics of the site and adjoining properties, interviews, and standard environmental record sources.

No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of the ASTM Standard is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and the practice recognizes reasonable limits of time and cost. The time and cost constraints as agreed to by the user or his representative may deem certain information common to the Phase I Site Assessment process to not be reasonably ascertainable or practically reviewable.

Appropriate inquiry does not mean an exhaustive assessment of a property. There is a point at which the cost of information obtained or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of the transaction.

Any sketches, maps, aerial photographs, or similar documents in the report may show approximate locations, property boundaries, or similar information and are included to assist the reader in visualizing the property. Phase Engineering, Inc. has made no survey of the site.

Phase Engineering, Inc. is not required to give testimony or appear in court or in other hearings or formal discussions regarding the subject property or this assessment unless prior arrangements are made.

Phase Engineering, Inc. assumes there are no hidden or unapparent environmental conditions of the site, subsoil, structures or surroundings which would represent a recognized environmental condition. Phase Engineering, Inc. assumes no responsibility for such conditions or for actions which might be required to discover such conditions.

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Information obtained from various sources is considered reliable and believed to be true and correct. Phase Engineering, Inc. will make a reasonable effort to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which Phase Engineering, Inc. has actual knowledge. Phase Engineering, Inc. assumes no responsibility for any inaccuracies in such items which may be revealed as a result of subsequent action, either by Phase Engineering, Inc. or others.

This report is prepared for the sole benefit of the user of the report and may not be relied upon by any other person or entity without the written authorization of and payment of a fee to Phase Engineering, Inc.

The report is valid for a period of 180 days from the date issued. Validity for AAI liability protections may be less. The report may not be used or updated by a third party without written authorization of and payment of a fee to Phase Engineering, Inc.

Phase Engineering, Inc. provides no legal opinion or advice. Consult a qualified attorney for any items of a legal nature.

## **2.5 Special Terms and Conditions**

No special terms or conditions were applicable to this report.

## **2.6 User Reliance**

This report is prepared for the sole benefit of the user of the report as identified in Section 4.0 of this report and may not be relied upon by any other person or entity without the written authorization of Phase Engineering, Inc. Each subsequent user must satisfy the User's Responsibilities set forth in Section 6 of the ASTM Standard E 1527-13 to qualify for the landowner liability protections under CERCLA.

### 3.0 Site Description

Subject Property Location and Description	
Detail	Description
Subject Property Address	Approximately 183 Acres Along I-10 Southwest of Major Drive (South side), Beaumont, Jefferson County, Texas 77705
General Location	An area location map and a site sketch are located in Appendix I of this report.
Legal Description	H.T. & B. Railroad Survey, Abstract 145, Tracts 1-2, Undivided 1/2 INT (per tax records)
Current Use of the Property	Undeveloped Land
Current Owner(s)	Wesley B and Virginia Whitmeyer Bolton

### 3.1 Current Uses of Adjoining Properties

#### Adjoining Property Uses

To the Northeast	Western Star Feightliner, Hidden Lake RV Park and an electric sub-station
To the Southeast	Fannet Road (TX 124), railroad tracks, Robinsons RV Park, undeveloped land, Eddies Automotive (not in service), single-family residential properties and Wheatons Plaza
To the Southwest	Doguets Rice Milling Company (not in service), AZZ Galvanizing and undeveloped land
To the Northwest	Interstate Highway 10 and associated service roads and undeveloped land

### 3.2 Description of Onsite Structures, Roads and Other Improvements

#### 3.2.1 Onsite Structures

No structures are currently located at the subject property.

#### 3.2.2 Roads

The following roads were observed onsite or adjacent to the subject property:

Road Details	
Road Name	Location of Road
Texas 124 (Fannett Road)	Southeast
Interstate Highway 10	Northwest
Industrial Road	Off South of property
Major Drive	Off Northeast of property

#### 3.2.3 Other Improvements / Utilities at the Subject Property

The following utilities and other improvements were identified at the subject property:

Water Source	None known or observed
Sanitary Sewer Source	None known or observed



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Other Improvements	No other improvements observed
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## 4.0 User Provided Information

### 4.1 User Responsibilities Information

User(s) of this report: Parigi Property Management

In order to qualify for one of the *Landowner Liability Protections* (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the “*Brownfields Amendments*”) the user *must* conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30 and 312.31. These inquiries must also be conducted by EPA Brownfield Assessment and Characterization grantees. The *user* should provide the following information (if available) to the *environmental professional*. Failure to conduct these inquiries (or where the user has not provided conclusive answers) could result in a determination that “*all appropriate inquiries*” is not complete.

If any user of this report desires *Landowner Liability Protections* (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001, the user should complete the “user responsibilities” included in Appendix IV.

Question	Response
<b>1. Environmental cleanup liens that are filed or recorded against the property (40 CFR 312.25).</b>	
Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law?	No comment received
<b>2. Activity and land use (AUL’s) limitations that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26(a)(1)(v) and vi).</b>	
Did a search of <i>recorded land title records</i> (or judicial records where appropriate) identify any AULs, such as <i>engineering controls</i> , land use restrictions or <i>institutional controls</i> that are in place of the property and/or have been filed or recorded against the property under federal, tribal, state or local law?	No comment received
<b>3. Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).</b>	
Do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?	No comment received
<b>4. Relationship to the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).</b>	

Question	Response
Does the purchase price being paid for this property reasonably reflect the fair market value of the property?	No comment received
If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?	No comment received
<b>5. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).</b>	
<b>Are you aware of commonly known or reasonably ascertainable information about the property that would help Phase Engineering, Inc. to identify conditions indicative of releases or threatened releases? For example, as user,</b>	
(a.) Do you know the past uses of the property?	No comment received
(b.) Do you know of specific chemicals that are present or once were present at the property?	No comment received
(c.) Do you know of spills or other chemical releases that have taken place at the property?	No comment received
(d.) Do you know of any environmental cleanups that have taken place at the property?	No comment received
<b>6. The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).</b>	
As the user of this ESA, based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of contamination at the property?	No comment received

User Provided Information	
Type of Information Provided	Details of Provided Information
Other Property Representative's Information	Jared Bishop, property purchaser; 936-615-9015 (cell)

## 4.2 Reason for Performing Phase I

As per ASTM Standard E 1527-13, it is the user's responsibility to identify the reason for performing the Environmental Site Assessment, which may include, among other reasons, the intention to satisfy one of the requirements to qualify for one of the landowner liability protections under CERCLA. If no reason for performing the Environmental Site Assessment is provided by the user, it is assumed the report is to conduct all appropriate inquiry to satisfy one of the landowner liability protections under CERCLA.

## 5.0 Records Review

### 5.1 Standard Environmental Record Sources, Federal, State & Tribal

The following federal, state and tribal environmental records were searched. This information was provided by AAI Environmental Data and is subject to the AAI Data Disclaimer. Full descriptions on the search and facilities located are included in the Appendix . The AAI Data summary is as follows:

Source	Environmental Record	ASTM Search Distance (miles)	Subject Property	Adjoining Property	1/2 Mile	1 Mile	Total
<b>Federal Sites</b>							
EPA	SEMS**	1.000	0	0	0	1	1
EPA	RCRA***	1	0	4	7	5	16
NRC	ERNS	Property	0	-	-	-	0
<b>State and Tribal Sites</b>							
TCEQ	SPL (NPL/CERCLIS)	1.000	0	0	0	0	0
TCEQ	MSW	0.500	0	0	0	-	0
TCEQ	CLI	0.500	0	0	0	-	0
TCEQ	AST	Adjoining*	0	1	-	-	1
TCEQ	UST	Adjoining*	0	3	-	-	3
TCEQ	LPST	0.500	0	2	2	-	4
TCEQ	RDR	0.25	0	0	0	-	0
TCEQ	IOP	0.5	0	0	0	-	0
TCEQ	VCP	0.500	0	0	0	-	0
RRC TX	RRC-VCP	0.5	0	0	0	-	0
TCEQ	BROWNFIELD	0.500	0	0	0	-	0
TCEQ	IHW	Adjoining*	0	3	0	-	3
TCEQ	IHWCA	0.5	0	1	1	-	2
RRC TX	RRC-BRP	0.5	0	0	0	-	0
<b>Supplemental Databases</b>							
TCEQ	MSD	1.000	0	0	0	0	0
TCEQ	DCR	0.500	0	0	0	-	0
TCEQ	DCRP	0.500	0	0	0	-	0
EPA	ACRES	0.500	0	0	0	-	0
*Adjoining properties are defined as being within a search radius of 0.25 mi. from the subject property boundaries.							
**SEMS includes CERCLIS, NPL, NPL delisted, NFRAP, and IC/EC							
***RCRA includes RCRA, RCRA TSD, RCRA CORRACTS, and IC/EC							

<b>UNGEOCODED SITES</b>		
Environmental Records	ASTM Search Distance (miles)	Total Identified
Federal / State/ Tribal	Subject Property - 1.0 mile	None (0)

### Ungeocoded Sites

Numerous sites / facilities are considered ungeocoded because the federal, state or local databases do not adequately define or represent the address and/or location to properly plot the site using standard geo-coding processes. Ungeocoded sites are generally reviewed using a zip code and street name search.

There were no ungeocoded sites identified under this assessment.

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## **National Priority List (NPL)**

List compiled by EPA pursuant to CERCLA 42 U.S.C. § 9605(a)(8)(B) of properties with the highest priority for cleanup pursuant to EPA's Hazard Ranking System. See 40 C.F.R. Part 300.

## **Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)**

The CERCLIS List contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL. The information on each site includes a history of all pre-remedial, remedial, removal and community relations activities or events at the site, financial funding information for the events, and unrestricted enforcement activities.

## **Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) / No Further Remedial Action Planned (NFRAP)**

NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly, or the contamination was not serious enough to require Federal Superfund action, CERCLA or NPL consideration.

## **Resource Conservation and Recovery Act (RCRA) Corrective Action Facilities (CORRACTS)**

Hazardous waste treatment, storage, or disposal facilities and other RCRA-regulated facilities (due to past interim status or storage of hazardous wastes beyond 90 days) that have been notified by the U.S. Environmental Protection Agency to undertake corrective action under RCRA. The CORRACTS list is a subset of the EPA database that manages RCRA data.

## **Resource Conservation and Recovery Act (RCRA) Non-CORRACTS Hazardous Waste Treatment, Storage, and Disposal Facilities (TSD)**

Those facilities on which treatment, storage and / or disposal of hazardous wastes takes place, as defined and regulated by RCRA.

## **Resource Conservation and Recovery Act (RCRA) Generators of Hazardous Wastes**

Those persons or entities that generate hazardous wastes, as defined by RCRA.

## **Emergency Response Notification System (ERNS)**

EPA's emergency response notification system list of reported CERCLA hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center. Notification requirements for such releases or spills are codified in 40 CFR Parts 302 and 355.

## **Federal Institutional Control / Engineering Control Registries**

Engineering Controls (EC) – Physical modifications to a site or facility (for example, capping, slurry walls, or point of use water treatment) to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or groundwater on the property. Engineering controls are a type of activity and use limitation (AUL).

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Institutional Controls (IC) – A legal or administrative restriction (for example, “deed restrictions,” restrictive covenants, easements, or zoning) on the use of, or access to, a site or facility to (1) reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or ground water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. An institutional control is a type of Activity and Use Limitation (AUL).

IC / EC Registries – Databases of institutional controls or engineering controls that may be maintained by a federal, state or local environmental agency for purposes of tracking sites that may contain residual contamination and AULs. The names for these may vary from program to program and state to state.

### **State / Tribal Equivalent - National Priority List (NPL)**

This list is the state / tribal equivalent to the EPA NPL list.

### **State / Tribal Equivalent Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) (SCL)**

This list is the state / tribal equivalent to the EPA CERCLIS list.

### **State / Tribal Voluntary Cleanup Program Sites**

List of state / tribal sites undergoing investigation, remediation and / or response action under the applicable state / tribal environmental regulatory agency.

### **Solid Waste Landfills (SWLF)**

List of landfills, transfer stations, sludge application sites, illegal dump sites, recycling facilities, and medical waste generators and transporters.

### **Leaking Petroleum Storage Tank Sites (LPST)**

State lists of leaking underground storage tank sites. RCRA gives EPA and states, under cooperative agreements with the EPA, authority to cleanup releases from UST systems or require owners and operators to do so. (42 U.S.C. § 6991b).

### **Registered Storage Tanks**

Underground storage tanks (USTs) - Any tank, including underground piping connected to the tank, that is or has been used to contain hazardous substances or petroleum products and the volume of which is 10% or more beneath the surface of the ground.

Aboveground storage tanks (ASTs) - Any tank, including aboveground piping connected to the tank, that is or has been used to contain hazardous substances or petroleum products and the volume of which is 90% or more above the surface of the ground.

### **State / Tribal Institutional Control / Engineering Control Registries**

Engineering Controls (EC) – Physical modifications to a site or facility (for example, capping, slurry walls, or point of use water treatment) to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or groundwater on the property. Engineering controls are a type of activity and use limitation (AUL).

Institutional Controls (IC) – A legal or administrative restriction (for example, “deed restrictions,” restrictive covenants, easements, or zoning) on the use of, or access to, a site or facility to (1) reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or ground water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. An institutional control is a type of Activity and Use Limitation (AUL).

IC / EC Registries – Databases of institutional controls or engineering controls that may be maintained by a federal, state or local environmental agency for purposes of tracking sites that may contain residual contamination and AULs. The names for these may vary from program to program and state to state.

## State / Tribal Brownfields

Brownfields are former industrial and commercial sites where redevelopment is complicated by real or perceived contamination.

### Sites Found:

Site Summary Table							
Map ID#	Type	Facility ID#	Facility Name	Address	Distance (mi) / Direction	Apparent Impact to Subject Property	Justification
1	RCRA	TXD050293794	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705-6959	0.04 SW	Yes	See information in table below
2	IHWC A	30568	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705	0.04 SW	Yes	See information in table below
3	IHW	30568	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705	0.04 SW	Yes	See information in table below
4	LPST	117939	FORMER SERVICE STATION	FANNETT RD BEAUMONT, TX	0.06 E	No	See information in table below
5	IHW	61536	PRECISION TUNE TRAINING CENTER	7055 S MAJOR DR BEAUMONT, TX 77705	0.09 NE	No	Distance

Site Summary Table							
Map ID#	Type	Facility ID#	Facility Name	Address	Distance (mi) / Direction	Apparent Impact to Subject Property	Justification
6	RCRA	TXD9808734 91	BAXTER OIL SVC	6029 INDUSTRIAL ROAD BEAUMONT, TX 77705	0.12 SW	No	Distance
7	RCRA	TXR0000063 20	SOUTH TEXAS EQUIPMENT	6808 S MAJOR DR BEAUMONT, TX 77705	0.12 NE	No	Distance
8	LPST	101602	RYDER TRUCK RENTAL	7425 WESPARK CIR BEAUMONT, TX	0.14 NE	No	Distance
9	AST	11898	RYDER 0880	7425 WESPARK CIR BEAUMONT, TX 77705	0.14 NE	No	Distance
10	UST	11898	RYDER 0880	7425 WESPARK CIR BEAUMONT, TX 77705	0.14 NE	No	Distance
11	RCRA	TXR0000790 94	STEEL PAINTERS	7453 FRINT DR BEAUMONT, TX 77720-7331	0.14 E	No	Distance
12	IHW	96621	EXXONMOB IL PIPELINE COMPANY- BEAUMONT OFFICE	6810 S MAJOR DR BEAUMONT, TX 77705	0.15 NE	No	See information in table below
13	UST	49019	BAKER OIL TOOLS	6810 S MAJOR DR BEAUMONT, TX 77705	0.15 NE	No	See information in table below
14	UST	1668	CSW DRYWALL SUPPLY	7420 WESPARK CIR BEAUMONT, TX 77705	0.2 NE	No	Distance



Site Summary Table							
Map ID#	Type	Facility ID#	Facility Name	Address	Distance (mi) / Direction	Apparent Impact to Subject Property	Justification
15	RCRA	TXT4900124 16	NATIONAL VACUUM TRUCKS INC	7315B FANNETT ROAD BEAUMONT, TX 77705	0.27 NE	No	Distance
16	RCRA	TXD0612785 45	BASIC ENERGY SERVICES	9045 HIGHWAY 124 BEAUMONT, TX 77705-6948	0.29 S	No	Distance
17	RCRA	TXD9825614 17	PWI BEAUMONT	9045 HIGHWAY 124 BEAUMONT, TX 77705-6948	0.29 S	No	Distance
18	LPST	102432	PWI	9045 HIGHWAY 124 BEAUMONT, TX	0.29 S	No	Distance
19	RCRA	TXR0000613 58	SELECT ENVIRONM ENTAL	6454 INDUSTRIAL RD BEAUMONT, TX 77705-6967	0.31 SW	No	Distance
20	RCRA	TXD9880556 61	MABRY FOUNDRY INC OF BEAUMONT	6531 INDUSTRIAL RD BEAUMONT, TX 77705	0.36 SW	No	Distance
21	IHWC A	38042	MABRY CASTINGS	6531 INDUSTRIAL RD BEAUMONT, TX 77705	0.36 SW	No	Distance
22	LPST	92801	MABRY FOUNDRY	6531 INDUSTRIAL RD BEAUMONT, TX	0.36 SW	No	Distance

Site Summary Table							
Map ID#	Type	Facility ID#	Facility Name	Address	Distance (mi) / Direction	Apparent Impact to Subject Property	Justification
23	RCRA	TXR000028050	COASTAL CHEMICAL	6534 INDUSTRIAL RD BEAUMONT, TX 77705-6969	0.37 SW	No	Distance
24	RCRA	TX0000067710	MAXIM CRANE RENTAL	7085 FANNETT RD BEAUMONT, TX 77720	0.49 NE	No	Distance
25	RCRA	TXD008068298	GULF COAST MACHINE & SUPPLY COMPANY	6817 INDUSTRIAL ROAD BEAUMONT, TX 77705	0.59 SW	No	Distance
26	RCRA	TXR000083909	HMFR BEAUMONT PLANT	7130 GARTH ST BEAUMONT, TX 77705-6882	0.63 SW	No	Distance
27	RCRA	TXD982287773	METALFORMS	7218 GARTH ST BEAUMONT, TX 77705-6884	0.67 S	No	Distance
28	SEMS	TXD050293794	INTERNATIONAL GALVANIZERS INC	500 INDUSTRY RD BEAUMONT, TX 77702	0.7 SW	No	Distance
29	RCRA	TXD982287492	FUTURE FOAM INC	685 INDUSTRIAL RD BEAUMONT, TX 77705	0.7 SW	No	Distance
30	RCRA	TXD988080222	WEATHERFORD-PETCO INC	INDUSTRIAL ROAD 10 MI S OF BEA BEAUMONT, TX 77705	0.7 SW	No	Distance

### Summary of Critical Identified Sites

The property located approximately 0.18 mile southeast of the subject property across Interstate Highway 10, addressed as 5898 Industrial Road under the name International Galvanizers, is a RCRA generator of hazardous wastes, an IHW registration and reporting facility and an IHW corrective action facility.

- RCRA violations were noted at this facility by the Environmental Protection Agency (EPA) between January and June 2017.
- This facility has an IHW status of "Active". Compliance investigations were conducted at this facility in February 2005, May 2005, May 2006, November 2006, July 2007, June 2010 and March 2017 and a compliance investigation file review was conducted in August 2017. Violations were noted at this facility in May 2017 for failure to properly maintain all facility operation and inspection related documentation and failure to identify the location of all container storage areas. Waste Management Units (WMUs) listed for this facility consist of a container storage area, miscellaneous storage containers, a spent acid storage tank, a wastewater sump with closure pending and two surface impoundments with a status of "Closed". Wastes listed for this facility include stabilized solids from hot dip galvanizing, waste oil, spent acid from steel pickling, spent sodium hydroxide, molten zinc kettle skimmings and bottoms, spent metal treatment solution, used oil filters, galvanizing process sludge, plant trash and used air filters. A complete list of wastes generated by this facility is located in the attached appendix.
- A leaking process tank at this facility caused a solution of acids and RCRA regulated metals to be released to soils around an emergency overflow sump in 1996. Corrective action investigation activities were conducted at this facility from November 1996 to December 1997 in order to determine the extent of impact near the overflow sump. A deed recordation was made at this facility documenting impacted soil near the overflow sump affected with elevated concentrations of RCRA regulated metals. No information is available to determine the northernmost extent of sub-surface impact from metals. No groundwater investigation activities were documented in association with soil investigation activities at this facility.

Historical documentation and the site visit indicate that this facility continued to operate as a galvanizing facility from the cessation of investigation activities to the present (approximately 20 years).

Phase Engineering, Inc. has the opinion that, based on the undetermined extent of impact at this facility and continued operations over an extended period of time, the subject property may have been impacted by a hazardous substance release at this facility.

The southeast adjoining property across Fannett Road, addressed as Fannett Road under the name Former Service Station, is listed as a LPST site. This facility is mis-plotted at its current location, and is actually located several miles to the northeast at a vacant lot adjoining to the west of 3755 Fannett Road, Beaumont, Texas 77705. Phase Engineering, Inc. has the opinion that, based on distance, the subject property does not appear to have been impacted by this facility.

The property located approximately 0.15 mile northeast of the subject property, addressed as 6810 South Major Drive under the names Baker Oil Tools and Exxonmobil Pipeline Company – Beaumont Office, is an unmapped RCRA generator of hazardous wastes, an IHW registration and reporting facility and a registered UST facility.

- There are no RCRA violations on file for this facility with the Environmental Protection Agency (EPA).

### Summary of Critical Identified Sites

- This facility has an IHW status of "Active" and is not undergoing corrective action. Waste Management Units (WMUs) listed for this facility consist of a container storage area. Wastes listed for this facility include degreaser solution.
- A 3,000 gallon UST was reported to have been installed at this facility in the mid to early-1980s and was removed from the ground prior to August 31, 1987. The UST is not listed as leaking with the TCEQ. No documentation is available to determine the status of the UST or any release determination activities possibly conducted at the time of UST removal.

Historical documentation indicates that operational areas at this facility were located more than 650 feet from the boundary of the subject property. Phase Engineering, Inc. has the opinion that, based on lack of reported releases and distance from operational areas, the subject property does not appear to have been impacted by this facility.

None of the remaining sites listed on the database are the subject property or an adjoining property. There is no indication that the sites identified in the ASTM Standard Environmental Record Sources search have had or will have an environmental impact to the subject property. Phase Engineering, Inc. has the opinion that, based on distance, direction, status or other justifications, it does not appear the subject property has been impacted from these remaining facilities.

Phase Engineering, Inc. has made an attempt to review regulatory agency files to determine if the subject property or any of the adjoining properties have been identified on one or more of the standard environmental record sources per ASTM Standard Practice E 1527-13 Section 8.2.1. The purpose of the regulatory file review is to obtain sufficient information to assist the environmental professional in determining if a recognized environmental condition, historical recognized environmental condition, controlled recognized environmental condition or a de minimis condition exists at the subject property in connection with the listing. Phase Engineering, Inc. has provided copies of the relevant reviewed regulatory agency file information in Appendix III of this report. If this information has been determined to be of a file size that is impractical to provide in Appendix III, then this information will be provided at the request of the user of this report under separate cover. Some of the regulatory documentation has been deemed not to be reasonably ascertainable due to (1) information that is not publically available, (2) information that is not obtainable from its source within reasonable time and cost constraints, and (3) information that is not practically reviewable (ASTM Standard Practice E 1527-13 Section 8.1.4). If a regulatory agency file review is not warranted or is not reasonably ascertainable, then Phase Engineering, Inc. has provided an explanation within this report for not conducting the applicable regulatory agency file review.

## 5.2 Additional Environmental Record Sources

To enhance and supplement the ASTM E1527-13 standard environmental record sources specified in 8.2.1, local records and/or additional state or tribal records shall be checked when, in the judgment of the environmental professional, such additional records (1) are reasonably ascertainable, (2) are sufficiently useful, accurate and complete in light of the objective of the records review (see 8.1.1), and (3) are generally obtained, pursuant to local good commercial or customary practice, in initial environmental site assessments in the type of commercial real estate transaction involved. To the extent additional sources are used to supplement the same record types listed specified in 8.2.1, approximate minimum search distances should not be less than those specified above (adjusted as provided in 8.2.1 and 8.1.2.1). Phase Engineering has reviewed additional environmental record sources and has included these sources in this report when the record sources were reasonably ascertainable, sufficiently useful and generally obtained, pursuant to local good commercial or customary practice.

### 5.3 Physical Setting Sources

The following physical setting sources were searched and no environmental problems due to geologic, hydrogeologic, hydrologic, or topographic characteristics of the subject property were noted nor were conditions identified in which hazardous substances or petroleum products were likely to migrate to the property or from or within the property into the groundwater or soil except as noted. A copy of each source is included in Appendix I of this report.

Topographic and Hydrogeologic Settings	
Source Name	Description
<b>USGS 7.5 Minute Topographic Map Beaumont West, Texas 2016</b>	
Current USGS Topographic Map	Elevation: Approximately 19 to 21 feet above mean sea level (msl) General Area Surface Gradient: Southeast
<b>Groundwater Information</b>	
Texas Water Development Board (TWDB) Submitted Driller's Database	Depth: 10 to 25 feet below ground surface (bgs) Hydraulic Direction: Assumed to be consistent with topographic gradient

Geologic Formation	
Formation Name	Formation Description
Beaumont Formation (Qb-stipled)	The Texas Geologic Map shows the subsurface geology of the property as Beaumont Formation (Qb-stipled)" Mostly clay, silt, sand and gravel; includes mainly stream channel, point bar, natural levee, and backswamp deposits; concretions and massive accumulations of calcium carbonate (caliche) and concretions of iron oxide and iron-manganese oxides in zone of weathering. The stippled overprint shows areas that are "Dominantly clay and mud of low permeability, high water-holding capacity, high compressibility, high to very high shrink-swell potential, poor drainage, level to depressed relief, low shear strength, and high plasticity; geologic units include interdistributary muds, abandoned channel-fill muds, and fluvial overbank muds." "The nonstippled areas are "Dominantly clayey sand and silt of low-moderate permeability, moderate drainage, level relief with local mounds and ridges, and high shear strength; geologic units include meanderbelt, levee, crevasse splay, and distributary sands." The lined overprint shows areas of floodplain deposits consisting of mud veneer over meanderbelt sand, little grain preserved, grass covered ( <i>source: Geologic Database of Texas compiled by the USGS, TWDB, BEG (2007) <a href="http://www.tnris.state.tx.us/datadownload/download.jsp">http://www.tnris.state.tx.us/datadownload/download.jsp</a> and Geologic Units in Texas USGS Mineral Resources On-line Spatial Data <a href="http://tin.er.usgs.gov/geology/state/fips-unit.php?state=TX">http://tin.er.usgs.gov/geology/state/fips-unit.php?state=TX</a>).</i>
<b>Source: Geologic Database of Texas compiled by the USGS, TWDB, BEG (2007) <a href="http://www.tnris.state.tx.us/datadownload/download.jsp">http://www.tnris.state.tx.us/datadownload/download.jsp</a> and Geologic Units in Texas USGS Mineral Resources On-line Spatial Data <a href="http://tin.er.usgs.gov/geology/state/fips-unit.php?state=TX">http://tin.er.usgs.gov/geology/state/fips-unit.php?state=TX</a></b>	

<b>Underlying Aquifer(s)</b>	
<b>Aquifer Name</b>	<b>Aquifer Description</b>
Gulf Coast Aquifer	"The Gulf Coast Aquifer is a major aquifer paralleling the Gulf of Mexico coastline from the Louisiana border to the Mexican border. It consists of several aquifers, including the Jasper, Evangeline, and Chicot aquifers, which are composed of discontinuous sand, silt, clay, and gravel beds. The maximum total sand thickness for the Gulf Coast Aquifer ranges from 700 feet in the south to 1,300 feet in the north. Freshwater saturated thickness averages about 1,000 feet. Water quality varies with depth and locality: it is generally good in the central and northeastern parts of the aquifer where it contains less than 500 milli-grams per liter of total dissolved solids but declines to the south where it typically contains 1,000 to more than 10,000 milligrams per liter of total dissolved solids and where the productivity of the aquifer decreases. High levels of radionuclides, believed mainly to be naturally occurring, are found in some wells in Harris County in the outcrop and in South Texas. The aquifer is used for municipal, industrial, and irrigation purposes. In Harris, Galveston, Fort Bend, Jasper, and Wharton counties, water level declines of up to 350 feet have led to land subsidence. The planning groups recommended several water management strategies that use the Gulf Coast Aquifer, including drilling more wells, pumping more water from existing wells, temporary overdrafting, constructing new or expanded treatment plants, desalinating brackish groundwater, developing conjunctive use projects, and reallocating supplies."
<p><b>Definition Source: Texas Major Aquifers Geodatabase (Updated December, 2006): Texas Water Development Board (TWDB) GIS Data, <a href="http://www.twdb.state.tx.us/mapping/gisdata">http://www.twdb.state.tx.us/mapping/gisdata</a> and Texas Water Development Board, Water for Texas 2007, Chapter 7 Groundwater Resources, pg. 176-238 <a href="http://www.twdb.state.tx.us/wrpi/swp/swp.htm">http://www.twdb.state.tx.us/wrpi/swp/swp.htm</a></b></p>	

<b>Flood Zone(s)</b>	
<b>Zone Designation</b>	<b>Zone Description</b>
Zone C (X-Unshaded)	Minimal risk areas outside the 1-percent and .2-percent-annual-chance floodplains. No BFEs or base flood depths are shown within these zones. (Zone X (unshaded) is used on new and revised maps in place of Zone C.)
Zone A	Areas subject to inundation by the 1-percent-annual-chance flood event. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown.
<p><b>This data was obtained from the most current FEMA information available on line. Actual flood elevation should be obtained by a qualified survey or other professional. During a flood event, the potential exists for the migration of hazardous substances and / or petroleum products to and / or from the subject property. Source: Flood Emergency Management Agency (FEMA) Jefferson County, Texas Flood Insurance Rate Map (FIRM).</b></p>	

<b>Near Surface Soils</b>	
<b>Soil Name(s)</b>	<b>Soil Description</b>
China Clay (ChiA)	<p>Component: China (90%)</p> <p>The China component makes up 90 percent of the map unit. Slopes are 0 to 1 percent. This component is on flats on coastal plains. The parent material consists of clayey fluviomarine deposits derived from igneous, metamorphic and sedimentary rock. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is somewhat poorly drained. Water movement in the most restrictive layer is low. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is very high. This soil is not flooded. It is not ponded. A seasonal zone of water saturation is at 60 inches during January, February, March. Organic matter content in the surface horizon is about 2 percent. This component is in the R150AY526TX Blackland 24-44" Pz ecological site. Nonirrigated land capability classification is 3w. Irrigated land capability classification is 3w. This soil does not meet hydric criteria. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 2 within 30 inches of the soil surface.</p>
China-Urban land complex, 0 to 1 percent slopes (ChoA)	<p>Component: China (65%)</p> <p>The China component makes up 65 percent of the map unit. Slopes are 0 to 1 percent. This component is on flats on coastal plains. The parent material consists of clayey fluviomarine deposits derived from igneous, metamorphic and sedimentary rock. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is somewhat poorly drained. Water movement in the most restrictive layer is low. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is very high. This soil is not flooded. It is not ponded. A seasonal zone of water saturation is at 60 inches during January, February, March. Organic matter content in the surface horizon is about 2 percent. This component is in the R150AY526TX Blackland 24-44" Pz ecological site. Nonirrigated land capability classification is 3w. Irrigated land capability classification is 3w. This soil does not meet hydric criteria. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 2 within 30 inches of the soil surface.</p> <p>Component: Urban land (35%)</p> <p>Generated brief soil descriptions are created for major soil components. The Urban land is a miscellaneous area.</p>
Urban Land (URLX)	<p>Component: Urban land (100%)</p> <p>Generated brief soil descriptions are created for major soil components. The Urban land is a miscellaneous area.</p>
<p><b>Source: United States Department of Agriculture (USDA) Soil Conservation Service Jefferson County, Texas Map. Soil Survey Geographic Database (SSURGO) including tabular and spatial components: USDA Natural Resources Conservation Service (NRCS) Geospatial Data Gateway <a href="http://datagateway.nrcs.usda.gov">http://datagateway.nrcs.usda.gov</a></b></p>	

## 5.4 Historical Use Information

Historical sources were consulted to develop a history of the previous uses of the property and the surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with the property. All obvious uses of the property were identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier as per ASTM E 1527-13, Section 8.1.4, Reasonably Ascertainable / Standard Sources.

### 5.4.1 Standard Historical Sources

The following historical sources were consulted to determine prior usage and potential areas of environmental problem areas:

#### 5.4.1.1 Aerial Photographs

Aerial photographs were reviewed for use which would indicate areas of environmental concern. The aerial photographs did not indicate any usage except as noted in this report and are included in Appendix I. The following aerial photographs were reviewed as part of this assessment:

Aerial Photograph Year(s)	Improvement Type(s)	Identified Area(s) of Concern
2016, 2006, 1995, 1982 and 1979	No improvements	Agricultural related activities
1960, 1953 and 1938	Residential improvements	Agricultural related activities

Aerial Photograph Year(s)	Improvement Type(s)	Identified Area(s) of Concern
<b>Northeast Property</b>		
2016 and 2006	Commercial improvements	No areas of concern
1995, 1982, 1979, 1960 and 1953	Residential improvements	No areas of concern
1938	Residential improvements	Agricultural related activities

Aerial Photograph Year(s)	Improvement Type(s)	Identified Area(s) of Concern
<b>Southeast Property</b>		
2016 and 2006	Commercial and residential improvements	Pipeline easement(s) and railroad tracks
1995 and 1982	Residential improvements	Pipeline easement(s) and railroad tracks
1979, 1960 and 1953	Residential improvements	Pipeline easement(s), railroad tracks and agricultural related activities
1938	Residential improvements	Railroad tracks and agricultural related activities



<b>Aerial Photograph Year(s)</b>	<b>Improvement Type(s)</b>	<b>Identified Area(s) of Concern</b>
<b>Southwest Property</b>		
2016, 2006, 1995, 1982 and 1979	Commercial and industrial improvements	Railroad tracks
1960, 1953 and 1938	No improvements	Agricultural related activities

<b>Aerial Photograph Year(s)</b>	<b>Improvement Type(s)</b>	<b>Identified Area(s) of Concern</b>
<b>Northwest Property</b>		
2016, 2006, 1995, 1982, 1979, 1960, 1953 and 1938	No improvements	Agricultural related activities

### 5.4.1.2 Fire Insurance Maps

In the late nineteenth century, public entities and private companies began preparing maps of central business districts and other developed corridors for use by fire insurance companies and governmental fire regulatory programs. These maps were updated and expanded geographically periodically throughout the twentieth century. The maps often indicate construction materials of specific building structures and the location of potential fire hazards such as gasoline tanks.

Fire insurance rate map coverage was not available for the subject property area.

### 5.4.1.3 Property Tax Files

Jefferson County Appraisal District tax records show that the subject property is owned by Wesley B and Virginia Whitmeyer Bolton. The property tax records are located in the Appendix.

### 5.4.1.4 Land Title Records & Environmental Lien Searches

As per agreement with the user of this report, a title search was not conducted for this assessment and was not provided by the user for review.

No recorded Institutional Controls or Engineering Controls (IC / EC) or Activity Use Limitations (AULs) were found as part of research of federal and state agencies.

### 5.4.1.5 USGS 7.5 Minute Topographic Map

Topographic maps were reviewed for use which would indicate areas of environmental concern. The topographic maps did not indicate any usage except as noted in this report and are included in Appendix I. The following topographic maps were reviewed for this assessment:

<b>TOPOGRAPHIC MAPS</b>	
<b>Year</b>	<b>Indication of Environmental Concerns</b>
2016	Railroad tracks are shown along the subject property boundary.

<b>TOPOGRAPHIC MAPS</b>	
<b>Year</b>	<b>Indication of Environmental Concerns</b>
1994	Indication of pipeline(s) are shown traversing the subject property and railroad tracks are shown along the subject property boundary.
1974	Railroad tracks are shown along the subject property boundary.
1960 and 1962	Railroad tracks are shown along the subject property boundary.
1946 and 1945	Railroad tracks are shown along the subject property boundary.
1921 and 1928	Railroad tracks are shown along the subject property boundary.

#### **5.4.1.6 Local Street Directories**

Street directories were reviewed at a minimum of five year intervals and / or property use changes via Phone Disc, Cole's, Kriss Kross, Morrison and Fourmy's, Johnson,, Polk City Directories and / or other directory resources.

See Street directory summary table on the following page(s).

## Street directories 201806054

	Subject Property	Northeast Adjoining Property	Southeast Adjoining Property	Southwest Adjoining Property	Northwest Adjoining Property
Year	Approximately 183 acres along Interstate Highway 10	7390 Interstate 10 South 6860 South Major Drive 6810 South Major Drive 6808 South Major Drive	7711 Highway 124 7809 Highway 124 8043 Highway 124 8189 Highway 124 8255 Highway 124 8337 Highway 124 8399 Highway 124 8409 Fannett Road 8473 Highway 124	5702 Industrial Road 5898 Industrial Road	Undeveloped Land
2015	NL	Beaumont Freightliner/ Select Transportation Resources Hideen Lake RV Resort Residential Amerglass Co	Residential Robbins RV Residential Residential Residential Residential Cellar Liquor/ Dot's Restaurant NL Residential	Cheek Dryer Inc/ World Harvest Group Azz Galvanizing Svc	NL
2010	NL	NL Hideen Lake RV Resort NL Amerglass Co/ South Texas Equipment Co	Residential Robbins RV NL Residential Residential Residential Cellar Liquor/ Dot's Restaurant NL Residential	Cheek Dryer Inc Azz Galvanizing Svc	NL
2005	NL	NL Residential Baker Oil Tools Amerglass Co/ South Texas Equipment Co	Pegaus Ranch Residential NL Residential Residential Residential Cellar Liquor/ Dot's Restaurant NL Residential	Cheek Dryer Inc Azz Galvanizing Svc	NL

# Street directories 201806054

	Subject Property	Northeast Adjoining Property	Southeast Adjoining Property	Southwest Adjoining Property	Northwest Adjoining Property
1999-2000	NL	NL Residential Baker Oil Tools South Texas Equipment Co	NL Residential NL NL NL NL NL NL	NL NL	NL
1995-1996	NL	NL Residential  Baker Oil Tools/ Tri-State Oil Tools South Texas Equipment Co	NL NL  NL NL NL NL NL	NL NL	NL
1990	NL	NL Residential Tri-State Oil Tools Oilfield Equipment Rentals Inc	NL NL NL NL NL NL NL NL	NL NL	NL
1985	NL	NL Residential Tri-State Oil Tools Oilfield Equipment Rentals Inc	NL NL NL NL NL NL NL NL	NL NL	NL
1980	NL	NL Residential Tri-State Oil Tools	NL NL NL	NL NL	NL

# Street directories 201806054

	Subject Property	Northeast Adjoining Property	Southeast Adjoining Property	Southwest Adjoining Property	Northwest Adjoining Property
		NL	NL NL NL NL NL NL		
1975	NL	NL Residential NL NL	NL NL NL NL NL NL NL NL	NL NL	NL
1970	NL	NL NL NL NL	NL NL NL NL NL NL NL NL	NL NL	NL
1965-1966	NL	NL NL NL NL	NL NL NL NL NL NL NL NL	NL NL	NL
1960	NL	NL NL NL NL	NL NL NL NL NL NL NL	NL NL	NL

# Street directories 201806054

	Subject Property	Northeast Adjoining Property	Southeast Adjoining Property	Southwest Adjoining Property	Northwest Adjoining Property
			NL		
			NL		
1956	NL	NL	NL	NL	NL
		NL	NL	NL	
		NL	NL		
		NL	NL		
			NL		
			NL		
			NL		
			NL		
			NL		
1949	NL	NL	NL	NL	NL
		NL	NL	NL	
		NL	NL		
		NL	NL		
			NL		
			NL		
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			NL		
			NL		
[year]	0	0	0	0	0
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[year]	0	0	0	0	0
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		0	0		
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			0		
			0		
[year]	0	0	0	0	0



### 5.4.1.7 Other Historical Records

According to ASTM E 1527-13, other historical sources not already addressed in the standard include but are not limited to: Miscellaneous maps, newspaper archives, internet sites, community organizations, local libraries, historical societies and current owners or occupants of neighboring properties. No other historical records were reviewed for subject property, except for the following:

<b>Oil and Gas Well Map</b>		
<b>Item of Concern</b>	<b>Feature Present?</b>	<b>Details of Identified Feature</b>
<b>Subject Property</b>		
Oil / gas well(s)	No	N/A
Plugged well(s)	No	N/A
Permitted location(s)	No	N/A
Dry hole(s)	No	N/A
Pipeline(s)	Yes	The map shows a crude oil pipeline traversing the south portion of the subject property.
Other notable features	No	N/A
<b>Adjoining Properties</b>		
Oil / gas well(s)	No	N/A
Plugged well(s)	No	N/A
Permitted location(s)	No	N/A
Dry hole(s)	No	N/A
Pipeline(s)	Yes	The map shows butadiene and natural gas pipelines located along the southeast boundary of the subject property and butadiene, propane and propylene polymer pipelines along the southeast corner of the subject property.
Other notable features	No	N/A
<b>The Texas Railroad Commission (RRC) map was reviewed for this assessment. Other water well map sources may be available for review. See map in Appendix I.</b>		

<b>Water Well Map</b>		
<b>Item of Concern</b>	<b>Feature Present?</b>	<b>Details of Identified Feature</b>
<b>Subject Property</b>		
Water well(s)	No	N/A
Monitoring well(s)	No	N/A
Plugged well(s)	No	N/A
Other notable features	N/A	N/A
<b>Adjoining Properties</b>		



Water Well Map		
Item of Concern	Feature Present?	Details of Identified Feature
Water well(s)	Yes	The map shows an industrial water withdrawal well on the southwest adjoining property and a stock water well on the southeast adjoining property across Fannett Road.
Monitoring well(s)	No	N/A
Plugged well(s)	No	N/A
Other notable features	N/A	N/A
<b>The Texas Water Development Board (TWDB) map was reviewed for this assessment. Other water well map sources may be available for review. See map in Appendix I.</b>		

### 5.4.2 Summary of Historical Information on Subject Property

Phase Engineering, Inc. has conducted thorough research including site observations, regulatory records review and review of reasonably ascertainable standard and other historical sources to determine current and past uses of the subject property. Standard and historical sources used to make these determinations include aerial photographs; topographic maps, city directories (if coverage is available); and / or, fire insurance rate maps (if coverage is available). The following are summaries of the subject property use:

Historical Use Subject Property							
Year Range	Property Use(s)	Aerial Photos	Topo Maps	Fire Insurance Maps	Street Directories	Interviews	Regulatory Files / Prior Reports
Late-1930s - 1970s	Rural residential property and undeveloped and agricultural land	✓	✓				
1970s - 2018	Undeveloped and agricultural land	✓	✓			✓	

### 5.4.3 Summary of Historical Use Information on Adjoining Properties

Phase Engineering, Inc. has conducted thorough research including site observations, regulatory records review and review of reasonably ascertainable standard and other historical sources to determine current and past uses of adjoining properties. Standard and historical sources used to make these determinations include aerial photographs; topographic maps, city directories (if coverage is available); and / or, fire insurance rate maps (if coverage is available). The following are summaries of each adjoining property use:

Historical Use Adjoining Properties	
Direction	Historical Use Description
Northeast Adjoining Property	Commercial truck dealership, RV park, electric sub-station, single-family residential property and undeveloped and agricultural land

<b>Historical Use Adjoining Properties</b>	
<b>Direction</b>	<b>Historical Use Description</b>
Southeast Adjoining Property	Fannet Road (TX 124), railroad tracks, RV park, automotive repair shop, retail center (no environmentally sensitive businesses), single-family residential property and undeveloped and agricultural land
Southwest Adjoining Property	Rice mill, galvanizing facility and undeveloped and agricultural land
Northwest Adjoining Property	Interstate Highway 10 and associated service roads and undeveloped and agricultural land

<b>Summary of Environmental Concerns Identified During Historical and Other Records Review</b>
<p>Historically, the subject property was agricultural land. Past use as agricultural land may have involved the storage and usage of pesticides, insecticides, herbicides, fungicides, fertilizers and / or other agricultural chemicals. No structures or areas that may have been utilized for storage or loading of these products were noted on historical information reviewed, interviews or during the site visit. These products are not considered a recognized environmental condition per Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) provided they were legally stored, processed and / or applied. Agricultural chemicals that may have been previously stored and / or applied at the subject property would likely have degraded due to surface runoff or atmospheric exposure since the subject property was last utilized for agricultural purposes. Additionally, contact to potentially remaining agricultural residual products would likely be limited during future anticipated development activities including import of engineered fill material and construction of onsite structures. Phase Engineering, Inc. has the opinion that based on lack of former onsite structures that may have potentially been utilized for storage or loading of agricultural chemicals and length of time since the subject property was utilized for agricultural purposes, it does not appear past use as agricultural land has impacted the subject property.</p>
<p>The Texas Railroad Commission (RRC) map shows a crude oil pipeline traversing the south portion of the subject property, butadiene and natural gas pipelines located along the southeast boundary of the subject property and butadiene, propane and propylene polymer pipelines located near the southeast corner of the subject property. Historical topographic maps show indications of the onsite crude oil pipeline. No evidence of impact to the subject property was identified in association with the pipelines from historical documentation, regulatory agency records or other sources. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.</p>
<p>Historical aerial photographs and topographic maps indicate that railroad tracks were located along the southeast boundary of the subject property from the late-1930s to the 2010s and along the southwest boundary of the subject property from the 1970s to the 2010s. The railroad tracks were observed during the site visit. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.</p>
<p>Historical street directories indicate that the northeast adjoining property, addressed as 7390 IH-10, was occupied by a truck dealership during the 2010s. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.</p>
<p>Historical street directories and aerial photographs indicate that the southwest adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility from the late-1970s to the 2010s. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.</p>

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## 6.0 Site Reconnaissance

### 6.1 Objective

The objective of the site reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with the subject property.

### 6.2 Observation, Methodology and Limiting Conditions

The property was visually and/or physically observed and any structure(s) located on the property to the extent not obstructed by bodies of water, adjacent buildings, or other obstacles was observed.

The periphery of the property was visually and/or physically observed, as well as the periphery of all structures on the property, and the property was viewed from all adjacent public thoroughfares.

On the interior of structures on the property, accessible common areas expected to be used by occupants or the public, maintenance and repair areas, including boiler rooms, and a representative sample of occupant spaces, were visually and/or physically observed. Areas beneath the floors, above ceilings, or behind walls were not observed unless additional services beyond the scope of work of ASTM E1527-13 were contracted for.

On June 21, 2018, the subject property was visually and physically observed and walked by Zahir Jamal of Phase Engineering, Inc. The environmental professional(s) responsible for this report, or a trained and qualified individual under their responsible charge, visually and physically observed the property and any structure(s) located on the property to the extent not obstructed by dense vegetation, bodies of water, adjoining buildings, and other obstacles.

100% visual and physical observation to the extent required by the ASTM Standard E1527-13.

The following limiting conditions were identified during the site reconnaissance:

#### *Limiting Condition(s)*

Vegetation / landscaping	✓
Concrete / asphalt pavement	
Stabilized gravel base	
Pre-existing former building slabs	
Existing buildings	
Surface water features	✓
Heavy equipment / existing inventory	
Boundary fences / walls	✓
Accumulation of snow or rainwater	✓
Inaccessible onsite building interior	
Other	✓

**\*Limiting condition is checked if present.**

### 6.3 Frequency

A single site visit was performed in connection with the Phase I Environmental Site Assessment on June 21, 2018.

## 6.4 Uses and Conditions

The uses and conditions should be noted to the extent visually and / or physically observed during the site visit. The uses and conditions should also be the subject of questions asked as part of interviews of owners, operator, and occupants. Uses and condition shall be described in the report. The environmental professional(s) performing the Phase I Environmental Site Assessment are obligated to identify uses and conditions only to the extent that they may be visually and/or physically observed on a site visit or to the extent that they are identified by the interviews.

Photographs of the subject property, adjoining properties and other key observed features are located in the appendix of this report.

The subject property was observed to be Approximately 183 Acres Along I-10 Southwest of Major Drive (South side), Beaumont, Texas and the current use(s) was / were observed to be Undeveloped Land.

The following table summarizes addresses and general uses observed for the adjoining properties.

### *Adjoining Property Details*

<b>Adjoining Property Details</b>		
<b>Direction</b>	<b>Observed Address / Address Range</b>	<b>General Observed Use(s)</b>
Northeast	6870 Major Drive	RV Park (Hidden Lake)
Northeast	Not observed	Electric Sub-station
Southeast	7809 Texas 124	RV Park (Robinson's)
Southeast	Not observed	Undeveloped land
Southeast	Not observed	Single-family residential properties
Southeast	8399 TX 124	Retail center of environmentally non-sensitive businesses (Wheaton's Plaza)
South	5702 Industrial Road	Out of service rice mill (Doguets Rice Milling Company)
Southwest	5898 Industrial Road	Industrial galvanizing facility (AZZ Galvanizing)
Southwest	Not observed	Undeveloped land
Northwest	Not observed	Undeveloped land

### 6.4.1 Surrounding Property Uses

The current uses of properties in the surrounding area were observed to have included the following general categories:

#### *Surrounding Area Property Types*

<b>Type of Property</b>
Commercial property
Industrial property
Single family residential property
Undeveloped land
Multi-family residential property

## 6.5 Summary of Observations

The following is a summary of observations identified during the site reconnaissance:

### Observation Summary

Item of Concern	Observed Onsite	Observed Offsite	Release Indicated	Comments
Hazardous Substances / Petroleum Products in Connection with Present Use(s)	No	Yes	No	Petroleum products are used at the south adjoining property (AZZ Galvanizing).
Hazardous Substances / Petroleum Products in Connection with Prior Use(s)	No	No	No	
Geologic, Hydrogeologic and / or Topographic Conditions	No	No	No	
Underground Storage Tanks (USTs)	No	No	No	
Aboveground Storage Tanks (ASTs)	No	Yes	No	Above ground storage tanks of unknown contents were observed at the south adjoining property (AZZ Galvanizing).
Indications of Underground Storage Tanks	No	No	No	
Sumps, Floor Drains or Storm Water Drains	No	No	No	
Odors	No	No	No	
Pools of Liquid	Yes	No	No	Pooled water was observed on portions of the subject property.
Drums	No	Yes	No	A number of 55-gallon drums of unknown contents were observed at the south adjoining property (AZZ Galvanizing).
Hazardous Substance and Petroleum Product Containers	No	Yes	No	Petroleum product containers were noted at the south adjoining property (AZZ Galvanizing).
Unidentified Substance Containers	No	Yes	No	Petroleum product containers of unknown specific contents were noted at the south adjoining property (AZZ Galvanizing).
Potential PCB Containing Equipment	No	Yes	No	Single pole mounted transformers are located at the south adjoining property (AZZ Galvanizing).
Clarifiers	No	No	No	
Pits, Ponds or Lagoons	No	Yes	No	A pond was observed at the northeast adjoining property (Hidden Lake RV Park).

Item of Concern	Observed Onsite	Observed Offsite	Release Indicated	Comments
				Canals containing standing water were observed traversing the subject property and along the northeast boundary of the subject property.
Stained Soil or Pavement	No	No	No	
Stressed Vegetation	No	No	No	
Solid Waste	No	No	No	
Mounds, Stockpiled Soils, Filled or Graded Areas and Depressions	No	Yes	No	Mounds of rice hulls were noted at the southwest adjoining property.
Waste Water	No	No	No	
Water Wells	No	No	No	
Oil and Gas Wells	No	No	No	
Monitoring Wells	No	No	No	
Observation Wells	No	No	No	
Injection Wells	No	No	No	
Pipelines	Yes	Yes	No	Markers for a petroleum products pipeline operated by SUNOCO (800-753-5531) were observed along the southern boundary of the subject property. Markers for a petroleum products pipeline operated by Mobile Chemical (800-537-5200), a natural gas pipeline operated by Kinder Morgan (800-633-0184) and a petroleum products pipeline operated by TPC (409-724 4777) were observed along the southeast property boundary.
Septic Systems	No	No	No	
Other	Yes	No	No	Abandoned farm equipment was noted on the subject property. An overhead electrical easement passes through the subject property.

#### Summary of Critical Observed Areas of Environmental Concern

The south adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility at the time of the site visit. Aboveground storage tanks, drums and assorted containers of unknown contents were observed located at this facility. No indications of a release were observed in association with these features. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.

The following facilities of potential environmental concern were observed at adjoining properties at the time of the site visit:

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<b>Summary of Critical Observed Areas of Environmental Concern</b>
<ul style="list-style-type: none"><li>• The northeast adjoining property, addressed as 7390 IH-10, was occupied by a commercial truck dealership and service facility.</li><li>• The southeast adjoining property across Fannett Road was occupied by an out of service automotive repair shop.</li></ul>
Automotive repair and service facilities are known to store, use and dispose of hazardous substances and petroleum products possibly including degreaser solvents, oil, hydraulic oil, lubricants, gasoline and diesel. No indications of a release were identified in association with these facilities from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by these facilities.
Mounds of rice hulls from former rice milling activities were observed located at the south adjoining property. No indications of a release were identified in association with the mounds. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the mounds of rice hulls.
Markers for natural gas and petroleum product pipelines were observed located along the southeast and south boundaries of the subject property. No indications of a release were identified in association with the pipelines from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.
Railroad tracks were observed located along the southeast boundary of the subject property and a railroad spur was observed located along the south property boundary. No indications of a release were identified in association with the railroad tracks from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the railroad tracks.

## 7.0 Interviews

### 7.1 Owner, Key Property Manager and / or Occupant Interviews

Interview Summary				
Date	Name	Relationship to Property	Method of Contact	Response Status
06/21/18	Jared Bishop	Purchaser	Onsite Interview	Received

Comments on interviews from items above:

Jared Bishop, property purchaser, indicated the following:

- He stated that the current use of the subject property is undeveloped land.
- Mr. Bishop stated that the past usage of the property was undeveloped land.
- He is not aware of any hazardous substance or petroleum product release(s) on the subject property or on adjoining properties.
- He stated that the subject property is not served by municipal water or municipal sewer utilities.
- He is not aware of any prior Phase 1 site assessments conducted on the subject property.
- He is not aware of any current or historical ASTs or USTs located on the subject property.
- He has been associated with the subject property for approximately 10 years.

See interviews, questionnaires and / or records of communication in the Appendix of this report.

### 7.2 State and / or Local Agency Officials Interviews

Interview Summary			
Date	Name / Entity	Method of Contact	Response Status
<b>Local Fire Department</b>			
06/20/18	Beaumont Fire Department	E-mail	Pending
<b>Local Health Department</b>			
06/20/18	City of Beaumont Environmental Health	Fax	Pending
<b>Local Building Department Records / Permits Department</b>			
06/20/18	Beaumont City Clerk Community Development	Fax	Pending
<b>Local Zoning / Planning Department</b>			
06/20/18	City of Beaumont Planning Division	Website	Received

Comments on interviews from items above:

Fire department records have been requested from Beaumont Fire Department. No response has been received. This is considered a data gap. Any information received after the issuance of this report that would affect the Findings and Conclusions of this assessment will be forwarded to the user of this report.



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Health / Environmental department records have been requested from City of Beaumont Environmental Health. No response has been received. This is considered a data gap. Any information received after the issuance of this report that would affect the Findings and Conclusions of this assessment will be forwarded to the user of this report.

Building department records have been requested from Beaumont City Clerk Community Development . No response has been received. This is considered a data gap. Any information received after the issuance of this report that would affect the Findings and Conclusions of this assessment will be forwarded to the user of this report.

Unincorporated areas of Jefferson County have no zoning regulations.

See interviews, questionnaires, records of communication, inquiries and / or Freedom of Information Act (FOIA) requests and any received response documentation in the Appendix of this report.

<b>Summary of Environmental Concerns Noted During Interviews / Inquiries</b>
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No environmental concerns were identified in association with interviews and inquiries conducted for this assessment.
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## 8.0 Findings with Opinions

Known or suspect environmental conditions associated with the subject property and the environmental professional's opinion(s) of the impact on the property of known or suspect environmental conditions identified are as follows:

### 8.1 Regulatory Agency Findings / Opinions

The following is a summary of results associated with regulatory agency records review in accordance with ASTM E1527-13 Sections 8.2.1 through 8.2.3:

<b>Summary of Critical Identified Sites</b>
<p>The property located approximately 0.18 mile southeast of the subject property across Interstate Highway 10, addressed as 5898 Industrial Road under the name International Galvanizers, is a RCRA generator of hazardous wastes, an IHW registration and reporting facility and an IHW corrective action facility.</p> <ul style="list-style-type: none"><li>• RCRA violations were noted at this facility by the Environmental Protection Agency (EPA) between January and June 2017.</li><li>• This facility has an IHW status of "Active". Compliance investigations were conducted at this facility in February 2005, May 2005, May 2006, November 2006, July 2007, June 2010 and March 2017 and a compliance investigation file review was conducted in August 2017. Violations were noted at this facility in May 2017 for failure to properly maintain all facility operation and inspection related documentation and failure to identify the location of all container storage areas. Waste Management Units (WMUs) listed for this facility consist of a container storage area, miscellaneous storage containers, a spent acid storage tank, a wastewater sump with closure pending and two surface impoundments with a status of "Closed". Wastes listed for this facility include stabilized solids from hot dip galvanizing, waste oil, spent acid from steel pickling, spent sodium hydroxide, molten zinc kettle skimmings and bottoms, spent metal treatment solution, used oil filters, galvanizing process sludge, plant trash and used air filters. A complete list of wastes generated by this facility is located in the attached appendix.</li><li>• A leaking process tank at this facility caused a solution of acids and RCRA regulated metals to be released to soils around an emergency overflow sump in 1996. Corrective action investigation activities were conducted at this facility from November 1996 to December 1997 in order to determine the extent of impact near the overflow sump. A deed recordation was made at this facility documenting impacted soil near the overflow sump affected with elevated concentrations of RCRA regulated metals. No information is available to determine the northernmost extent of sub-surface impact from metals. No groundwater investigation activities were documented in association with soil investigation activities at this facility.</li></ul> <p>Historical documentation and the site visit indicate that this facility continued to operate as a galvanizing facility from the cessation of investigation activities to the present (approximately 20 years). Phase Engineering, Inc. has the opinion that, based on the undetermined extent of impact at this facility and continued operations over an extended period of time, the subject property may have been impacted by a hazardous substance release at this facility.</p>
<p>The southeast adjoining property across Fannett Road, addressed as Fannett Road under the name Former Service Station, is listed as a LPST site. This facility is mis-plotted at its current location, and is actually located several miles to the northeast at a vacant lot adjoining to the west of 3755 Fannett Road, Beaumont, Texas 77705. Phase Engineering, Inc. has the opinion that, based on distance, the subject property does not appear to have been impacted by this facility.</p>

### Summary of Critical Identified Sites

The property located approximately 0.15 mile northeast of the subject property, addressed as 6810 South Major Drive under the names Baker Oil Tools and Exxonmobil Pipeline Company – Beaumont Office, is an unmapped RCRA generator of hazardous wastes, an IHW registration and reporting facility and a registered UST facility.

- There are no RCRA violations on file for this facility with the Environmental Protection Agency (EPA).
- This facility has an IHW status of “Active” and is not undergoing corrective action. Waste Management Units (WMUs) listed for this facility consist of a container storage area. Wastes listed for this facility include degreaser solution.
- A 3,000 gallon UST was reported to have been installed at this facility in the mid to early-1980s and was removed from the ground prior to August 31, 1987. The UST is not listed as leaking with the TCEQ. No documentation is available to determine the status of the UST or any release determination activities possibly conducted at the time of UST removal.

Historical documentation indicates that operational areas at this facility were located more than 650 feet from the boundary of the subject property. Phase Engineering, Inc. has the opinion that, based on lack of reported releases and distance from operational areas, the subject property does not appear to have been impacted by this facility.

None of the remaining sites listed on the database are the subject property or an adjoining property. There is no indication that the sites identified in the ASTM Standard Environmental Record Sources search have had or will have an environmental impact to the subject property. Phase Engineering, Inc. has the opinion that, based on distance, direction, status or other justifications, it does not appear the subject property has been impacted from these remaining facilities.

## 8.2 Historical and Other Source Review Findings / Opinions

The following is a summary of results associated with standard historical sources in accordance with ASTM E1527-13 Sections 8.3.4.1 through 8.3.4.6 and 8.3.4.9:

### Summary of Environmental Concerns Identified During Historical and Other Records Review

Historically, the subject property was agricultural land. Past use as agricultural land may have involved the storage and usage of pesticides, insecticides, herbicides, fungicides, fertilizers and / or other agricultural chemicals. No structures or areas that may have been utilized for storage or loading of these products were noted on historical information reviewed, interviews or during the site visit. These products are not considered a recognized environmental condition per Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) provided they were legally stored, processed and / or applied. Agricultural chemicals that may have been previously stored and / or applied at the subject property would likely have degraded due to surface runoff or atmospheric exposure since the subject property was last utilized for agricultural purposes. Additionally, contact to potentially remaining agricultural residual products would likely be limited during future anticipated development activities including import of engineered fill material and construction of onsite structures. Phase Engineering, Inc. has the opinion that based on lack of former onsite structures that may have potentially been utilized for storage or loading of agricultural chemicals and length of time since the subject property was utilized for agricultural purposes, it does not appear past use as agricultural land has impacted the subject property.

The Texas Railroad Commission (RRC) map shows a crude oil pipeline traversing the south portion of the subject property, butadiene and natural gas pipelines located along the southeast boundary of the subject property and butadiene, propane and propylene polymer pipelines located near the southeast

**Summary of Environmental Concerns Identified During Historical and Other Records Review**

corner of the subject property. Historical topographic maps show indications of the onsite crude oil pipeline. No evidence of impact to the subject property was identified in association with the pipelines from historical documentation, regulatory agency records or other sources. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.

Historical aerial photographs and topographic maps indicate that railroad tracks were located along the southeast boundary of the subject property from the late-1930s to the 2010s and along the southwest boundary of the subject property from the 1970s to the 2010s. The railroad tracks were observed during the site visit. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.

Historical street directories indicate that the northeast adjoining property, addressed as 7390 IH-10, was occupied by a truck dealership during the 2010s. See Site Reconnaissance Findings / Opinions in Section 8.3 for further information.

Historical street directories and aerial photographs indicate that the southwest adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility from the late-1970s to the 2010s. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.

### 8.3 Site Reconnaissance Findings / Opinions

The following is a summary of results associated with observations noted during the site reconnaissance in accordance with ASTM E1527-13 Sections 9.4.1 through 9.4.4.7:

**Summary of Critical Observed Areas of Environmental Concern**

The south adjoining property, addressed as 5898 Industrial Road, was occupied by a galvanizing facility at the time of the site visit. Aboveground storage tanks, drums and assorted containers of unknown contents were observed located at this facility. No indications of a release were observed in association with these features. See Regulatory Agency Findings / Opinions in Section 8.1 for further information.

The following facilities of potential environmental concern were observed at adjoining properties at the time of the site visit:

- The northeast adjoining property, addressed as 7390 IH-10, was occupied by a commercial truck dealership and service facility.
- The southeast adjoining property across Fannett Road was occupied by an out of service automotive repair shop.

Automotive repair and service facilities are known to store, use and dispose of hazardous substances and petroleum products possibly including degreaser solvents, oil, hydraulic oil, lubricants, gasoline and diesel. No indications of a release were identified in association with these facilities from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by these facilities.

Mounds of rice hulls from former rice milling activities were observed located at the south adjoining property. No indications of a release were identified in association with the mounds. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the mounds of rice hulls.

Markers for natural gas and petroleum product pipelines were observed located along the southeast and south boundaries of the subject property. No indications of a release were identified in association with the pipelines from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the pipelines.

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<b>Summary of Critical Observed Areas of Environmental Concern</b>
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Railroad tracks were observed located along the southeast boundary of the subject property and a railroad spur was observed located along the south property boundary. No indications of a release were identified in association with the railroad tracks from observed conditions or historical and regulatory agency documentation reviewed. Phase Engineering, Inc. has the opinion that the subject property does not appear to have been impacted by the railroad tracks.
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## **8.4 Interview Findings / Opinions**

The following is a summary of results associated with interviews and other inquiries in accordance with ASTM E1527-13 Sections 8.3.4.7, 8.3.4.8 and 10.5:

<b>Summary of Environmental Concerns Noted During Interviews / Inquiries</b>
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No environmental concerns were identified in association with interviews and inquiries conducted for this assessment.
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## 9.0 Conclusions

Phase Engineering, Inc. has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of subject property and more fully described within the report. Any exception to, or deletions from, this practice are described in Section 2.0 of the report.

<b>RECs</b>
<b>Recognized Environmental Conditions</b>
<p>Recognized environmental condition is defined in ASTM Standard E 1527-13 as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” Phase Engineering, Inc. has considered all migration pathways including soil, groundwater and vapor during evaluation of all identified environmental conditions. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:</p> <ul style="list-style-type: none"> <li>• Indication of potential impact to the subject property as a result of past hazardous substance release(s) from long term operation and IHW corrective action related impact at the southwest adjoining galvanizing facility.</li> </ul>

<b>CRECs</b>
<b>Controlled Recognized Environmental Conditions</b>
<p>A controlled recognized environmental condition (CREC) is defined in ASTM Standard E 1527-13 as “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.” Controlled recognized environmental conditions are recognized environmental conditions. This assessment has revealed no evidence of controlled recognized environmental conditions in connection with the property.</p>

<b>HRECs</b>
<b>Historical Recognized Environmental Conditions</b>
<p>A historical recognized environmental condition (HREC) is defined in ASTM Standard E 1527-13 as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.” A historical recognized environmental condition is not a recognized environmental condition. This assessment has revealed no evidence of historical recognized environmental conditions in connection with the property.</p>

<b>De minimis Conditions</b>
<b>De minimis Conditions</b>
<p><i>De minimis</i> conditions are defined in ASTM Standard E 1527-13 as conditions “that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.” <i>De minimis</i> conditions are not recognized environmental conditions. This assessment has revealed no evidence of <i>de minimis</i> conditions in connection with the property.</p>

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## 10.0 Recommendations

Recommendations
<p>The following recommendation is made with respect to the environmental aspects of the subject property:</p> <p>A Phase II Environmental Site Assessment is recommended to investigate the potential soil, groundwater and vapor impact due to the identified recognized environmental condition(s).</p>

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## **11.0 Deviations**

### **11.1 Scope of Services**

There were no significant deletions or deviations from the ASTM Standard E 1527-13 scope of services.

### **11.2 Client Constraints**

Client and/or user imposed constraints consisted of the following:

- There were no user constraints.



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## **12.0 Qualifications**

The statement of qualifications of the environmental professionals responsible for the Environmental Site Assessment is included in the Appendix of this report.

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## 13.0 Environmental Professional and Support Staff Statement(s)

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.


We further declare that, to the best of our professional knowledge and belief, We meet the definition of Environmental Professionals as defined in §312.10 of 40 CFR 312.

Inspected By:

Z. Jamal.

Zahir Jamal

Reviewed By:



Janis Franklin, P.G.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Prepared By:



Thomas Buechele

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## 14.0 Non-Scope Considerations

The ASTM Standard E 1527-13 Section 13.1.5 has identified several non-scope considerations that persons may want to assess in connection with commercial real estate. No implication is intended as to the relative importance or inquiry into such non-scope considerations, and this list of non-scope considerations is not intended to be all inclusive:

- Asbestos-containing building materials
- Biological agents
- Cultural and historic resources
- Ecological resources
- Endangered species
- Health and safety
- Indoor air quality unrelated to release of hazardous substances or petroleum products into the environment
- Industrial hygiene
- Lead-based paint
- Lead in drinking water
- Mold
- Radon
- Regulatory compliance
- Wetlands

Additional non-scope issues that are not addressed in this report are:

- Activity and use limitations compliance
- Controlled substances unless this report was prepared as part of an EPA Brownfields Assessment and Characterization Grant awarded under CERCLA 42 U.S.C. §9604(k)(2)(B) and contracted for as such in the letter of engagement
- Earthquake and Fault Zones
- Vapor intrusion/encroachment screening as provided for in ASTM Standard E 2600

A discussion of certain non-scope items are included below for guidance for a user of this report to determine if additional inquiry may be appropriate. There may be standards or protocols for assessment of potential hazards and conditions associated with non-scope conditions developed by governmental entities, professional organizations, or other private entities. No implication is intended as to the relative importance of inquiry into such non-scope considerations.

### 14.1 Asbestos-Containing Building Materials

Asbestos is a commercial term for a group of silicate minerals that readily separate into thin, strong fibers that are flexible, heat resistant, and chemically inert, and are used in a wide variety of industrial products. Of the six asbestos minerals, chrysotile, amosite, and crocidolite have been most commonly used in building products. When inhaled or ingested, it has been determined that asbestos fibers can cause serious health problems. A building owner and/or manager is required to follow all federal, state, and local rules and regulations pertaining to asbestos containing building materials. An asbestos inspection not conducted as part of this assessment.

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## **14.2 Biological Agents**

A biological agent is an infectious disease or toxin. There are more than 1200 different kinds of biological agents. Biological agents include poisons, viruses, microorganisms (bacteria and fungi) and some unicellular and multicellular eukaryotes (for example parasites) and their associated toxins. Biological agents were not evaluated during this assessment.

## **14.3 Cultural and Historic Resources**

Cultural and Historic Resources refers to those nonrenewable remains of human activity, occupation, artifacts, ruins, works of art, architecture, and areas of religious significance that were of importance in human events. These resources consist of physical remains, areas where significant human events occurred, even though physical evidence of such events no longer exists and the physical setting immediately surrounding the actual resource. Historic and cultural resources include both prehistoric and historic remains. A Cultural and Historical Resources study was not conducted as part of this assessment.

## **14.4 Ecological Resources**

Ecological resources include fish and wildlife populations, habitats, and their relationships to each other and the environment/ecosystem. An Ecological Resource evaluation was not conducted as part of this assessment.

## **14.5 Endangered Species**

The Endangered Species Act of 1973 was established to provide protection and recovery for a list of specific species and their ecosystems. An endangered species is defined as an animal or plant species which are in danger of extinction throughout all or a significant portion of its range. A threatened species is one which is likely to become endangered in the foreseeable future.

Critical Habitat is a specific geographic area(s) that has been designated by the United States Fish and Wildlife Service (USFW) which is essential for the conservation of a listed threatened or endangered species and may require special management and protection. The subject property does not contain an area determined to be critical habitat according to review of the USFW Critical Habitat Portal. See Critical Habitat Map in the appendix.

## **14.6 Health and Safety**

Occupational safety and health is a cross-disciplinary area concerned with protecting the safety, health and welfare of people engaged in work or employment. As a secondary effect, it may also protect co-workers, family members, employers, customers, suppliers, nearby communities, and other members of the public who are impacted by the workplace environment. Health and safety issues are regulated by the Occupational Safety and Health Administration (OSHA). A Health and Safety inspection was not conducted as part of this assessment. "It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use." See ASTM Standard E-1527-13 Sec. 1.5

## **14.7 Indoor Air Quality**

Indoor air quality is a constantly changing interaction of complex factors that affect the types, levels, and importance of pollutants in indoor environments. These factors include: sources of pollutants or odors; design, maintenance and operation of building ventilation systems; moisture and humidity; and occupant perceptions and susceptibilities. In addition, there are many other factors that affect comfort or perception of indoor air quality. Controlling indoor air quality involves integrating three main strategies. First, manage the sources of pollutants either by removing them from the building or isolating them from people through

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physical barriers, air pressure relationships, or by controlling the timing of their use. Second, dilute pollutants and remove them from the building through ventilation. Third, use filtration to clean the air of pollutants. An Indoor Air Quality assessment was not conducted as part of this report.

## **14.8 Industrial Hygiene**

Industrial hygiene is defined as the recognition, evaluation, and control of workplace hazards. Its origins are based on limiting personal exposures to chemicals, and have evolved to address the control of most other workplace hazards including over-exposure to noise, heat, vibration, and repetitive motion. Occupational exposure to chemicals is still considered one of the most wide spread hazards in industry. The use of engineering controls is the preferred method of limiting these exposures. Dilution and capture ventilation are two important methods to control occupational exposure. The design and position of hoods and vents, and amount of air infiltration can substantially change exposure conditions. Material Safety Data Sheets and other documentation provide a basis for predicting adverse effects, disposal needs, and fire and ignition concerns. An Industrial Hygiene assessment was not conducted as part of this report.

## **14.9 Lead-Based Paint**

Lead is a metal that is highly toxic to humans, particularly children. Human contamination usually occurs by Lead is a toxic metal that was used for many years in products found in construction. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Children six years old and under are most at risk. Human contamination usually occurs by oral ingestion or respiratory inhalation of dust or chips of paint made with lead pigment in both interior and exterior paints and finishes. A building owner and/or manager is required to follow all federal, state, and local rules and regulations pertaining to lead-based paint. A lead-based paint inspection was not conducted as part of this assessment.

## **14.10 Lead in Drinking Water**

Lead is a toxic metal found in natural deposits and is commonly used in plumbing materials and water service lines. Lead is rarely found in source water, but enters tap water through corrosion of plumbing materials. Construction built before 1986 is more likely to have lead pipes, fixtures and solder. All public water supply systems are tested for lead. Tests to determine lead in the drinking water were not conducted as part of this assessment.

## **14.11 Mold**

Molds are group of organisms that belong to the kingdom Fungi and the terms fungi and mold are used interchangeably. Molds produce tiny spores to reproduce. Mold spores waft through the indoor and outdoor air continually. When mold spores land on a damp spot indoors, they may begin growing and digesting whatever they are growing on in order to survive. There are molds that can grow on wood, paper, carpet, and foods. When excessive moisture or water accumulates indoors, mold growth will often occur, particularly if the moisture problem remains undiscovered or un-addressed. There is no practical way to eliminate all mold and mold spores in the indoor environment; the way to control indoor mold growth is to control moisture. Potential health effects and symptoms associated with mold exposures include allergic reactions, asthma, and other respiratory complaints. A Mold inspection was not conducted as part of this assessment.

## **14.12 Radon**

The U.S. EPA and the U.S. Geological Survey evaluated the radon potential in the U.S. and developed a map to assist National, State and local organizations to target their resources and to assist building code officials in deciding whether radon-resistant features are applicable in new construction. The map assigns each of the 3,141 counties in the U.S. to one of three zones based on radon potential. Each zone

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designation reflects the average short-term radon measurement that can be expected to be measured in a building without the implementation of radon control methods. Radon levels were not evaluated for the subject property.

### **14.13 Regulatory Compliance**

Regulatory compliance refers to systems or departments at corporations and public agencies to ensure that personnel are aware of and take steps to comply with relevant laws and regulations. Environmentally related regulatory bodies include, but are not limited to the Environmental Protection Agency (EPA), individual state environmental commissions, agencies or departments and local (county / city) jurisdictions. This report is not intended to evaluate or assess regulatory compliance in association with the subject property other than that necessary to identify recognized environmental conditions.

### **14.14 Wetlands**

The U.S. Army Corps of Engineers (USCOE) requires permitting prior to the filling of certain jurisdictional wetland areas and other waters of the U.S. Geospatial wetland data is managed by the U.S. Fish and Wildlife Service and presented in maps known as the National Wetland Inventory (NWI). A review of the NWI map for the subject property indicates mapped wetlands at the subject property identified as Pf (Palustrine - farmed) and PFO1A (Palustrine - Forested - Broad-leaved Deciduous - Temporarily Flooded). Additionally, there are several streams identified as R4SBCx (Riverine - Intermittent - Streambed - Seasonally Flooded - Excavated) and R5UBFx (Riverine - Unknown Perennial - Unconsolidated Bottom - Semipermanently Flooded - Excavated).

The subject property consists of historic rice cultivation and the onsite stream channels provide irrigation for the rice farming activities. Shallow inundated areas and saturated soils indicative of wetlands were observed across the subject property and in the drainage canals. Hydrophytic vegetation was observed in the rice fields and forested areas on the northeast portion of the subject property. Mapped soils at the subject property do not meet hydric criteria. Possible hydrologic connections of the observed inundated / wetland areas to other offsite wetland areas were noted during the site visit. These connections consist of drainage and irrigation canals leading to Hillebrandt Bayou to the distant southeast. A review of historical aerial photographs and topographic maps indicates that one or more drainage/irrigation canals located at the subject property were historically natural drainage or stream features which would provide a hydrologic connection to navigable waterways or other Waters of the U.S.

Due to the observed onsite features indicative of a wetland area, prior identification of onsite wetlands noted on the NWI map and possible hydrologic connection of the subject property to Hillebrandt Bayou; portions of the subject property may be classified as jurisdictional wetland areas that may require further evaluation prior to future onsite development activities.

The USCOE and the U.S. Environmental Protection Agency use three characteristics as indicators of wetlands. These characteristics are: Vegetation, Soil, and Hydrology. The final determination of whether an area is a wetland and whether the activity requires a permit must be made by the appropriate Corps District Office (source: Corps of Engineers Wetlands Delineation Manual).

See NWI Map and other map sources in the Appendix.

### **14.15 AUL Compliance**

An activity or use limitation is a legal or physical restriction or limitation on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition

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of no significant risk to public health or the environment. Compliance with AUL's may be necessary as a continuing obligation to maintain the landowner liability protections under CERCLA. AUL compliance was not assessed as part of this report.

### **14.16 Controlled Substances**

A controlled substance is generally a drug or chemical whose manufacture, possession, and use are regulated by a government. This may include illegal drugs and prescription medications. Some precursor chemicals used for the production of illegal drugs are also controlled, even though they may lack the pharmacological effects of the drugs themselves. Although, controlled substances are not included within the scope of the ASTM E 1527-13 Standard, the EPA's All Appropriate Inquiries rule does require a person conducting an environmental site assessment as part of an EPA Brownfields Assessment and Characterization Grant awarded under CERCLA 42 U.S.C. para 9604(k)(2)(B) to include controlled substances as defined in the Controlled Substances Act (21 U.S.C. para 802) within the scope of the assessment investigation to the extent directed in the terms and conditions of the specific grant or cooperative agreement. Controlled Substances were not addressed in this assessment.

### **14.17 Earthquake and Fault Zones**

An earthquake is a sudden motion or trembling in the earth caused by the abrupt release of slowly accumulated strain. A fault, or fault line, is a fracture or fracture zone along which there has been displacement of the sides relative to one another parallel to the fracture. Earthquake and fault zones are not addressed in this report.

### **14.18 Vapor Intrusion/Encroachment**

A vapor encroachment condition is the presence or likely presence of hazardous substances or petroleum products vapors in the sub-surface of a property caused by the release of vapors from contaminated soil or groundwater either on or near the property. Vapor intrusion is the presence of such vapors in a building or structure located on a property. Although the vapor migration pathway is considered in the identification of recognized environmental conditions under ASTM Standard E 1527-13 and in this report, a vapor encroachment screening or vapor intrusion assessment was not conducted as part of this report.

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## 15.0 Common Acronyms

AAI – All Appropriate Inquiry  
ACBM – Asbestos Containing Building Material  
AST – Aboveground Storage Tank  
ASTM – American Society for Testing and Materials (2001)  
AUL – Activity and Usage Limitation  
BF – Brownfield  
BTEX – Benzene, Toluene, Ethyl benzene and Xylenes  
CDC – Certified Development Corporation  
CERCLA – Comprehensive Environmental Response, Compensation and Liability Act  
CERCLIS – Comprehensive Environmental Response, Compensation and Liability Information System  
CERCLIS NFRAP - Comprehensive Environmental Response, Compensation and Liability Information System with No Further Remedial Action Planned  
CLI – Closed Landfill Inventory  
CORRACTS – Corrective Action (RCRA)  
CREC – Controlled recognized environmental condition  
EC – Engineering Control  
EPA – Environmental Protection Agency  
ERNS – Emergency Response Notification System  
FOIA – Freedom of Information Act  
GWBZ – Groundwater Bearing Zone  
HREC – Historical recognized environmental condition  
IC – Institutional Control  
IHW – Industrial Hazardous Waste  
IOP – Innocent Owner / Operator Program  
LPST – Leaking Petroleum Storage Tank  
MUD – Municipal Utility District  
MSD – Municipal Settings Designation  
MSL – Mean Sea Level  
MTBE – Methyl tert butyl ether  
NAPL – Non-aqueous Phase Liquids  
NPL – National Priority List  
NRCS – Natural Resource Conservation Service  
OSHA – Occupational Safety and Health Administration  
PAH – Polycyclic Aromatic Hydrocarbons  
PCB – Polychlorinated Biphenyls  
PCE – Perchloroethene (Tetrachloroethene)  
PPM – Parts Per Million  
PSH – Phase Separated Hydrocarbons  
PUD – Public Utility District  
RCRA – Resource Conservation and Recovery Act  
REC – Recognized environmental condition  
SBA – Small Business Administration  
SCL – State CERCLIS List  
SPL – State Priority List  
SVOC – Semi-Volatile Organic Compounds  
SWLF – Solid Waste Landfill  
TCEQ – Texas Commission on Environmental Quality  
TDSHS – Texas Department of State Health Services

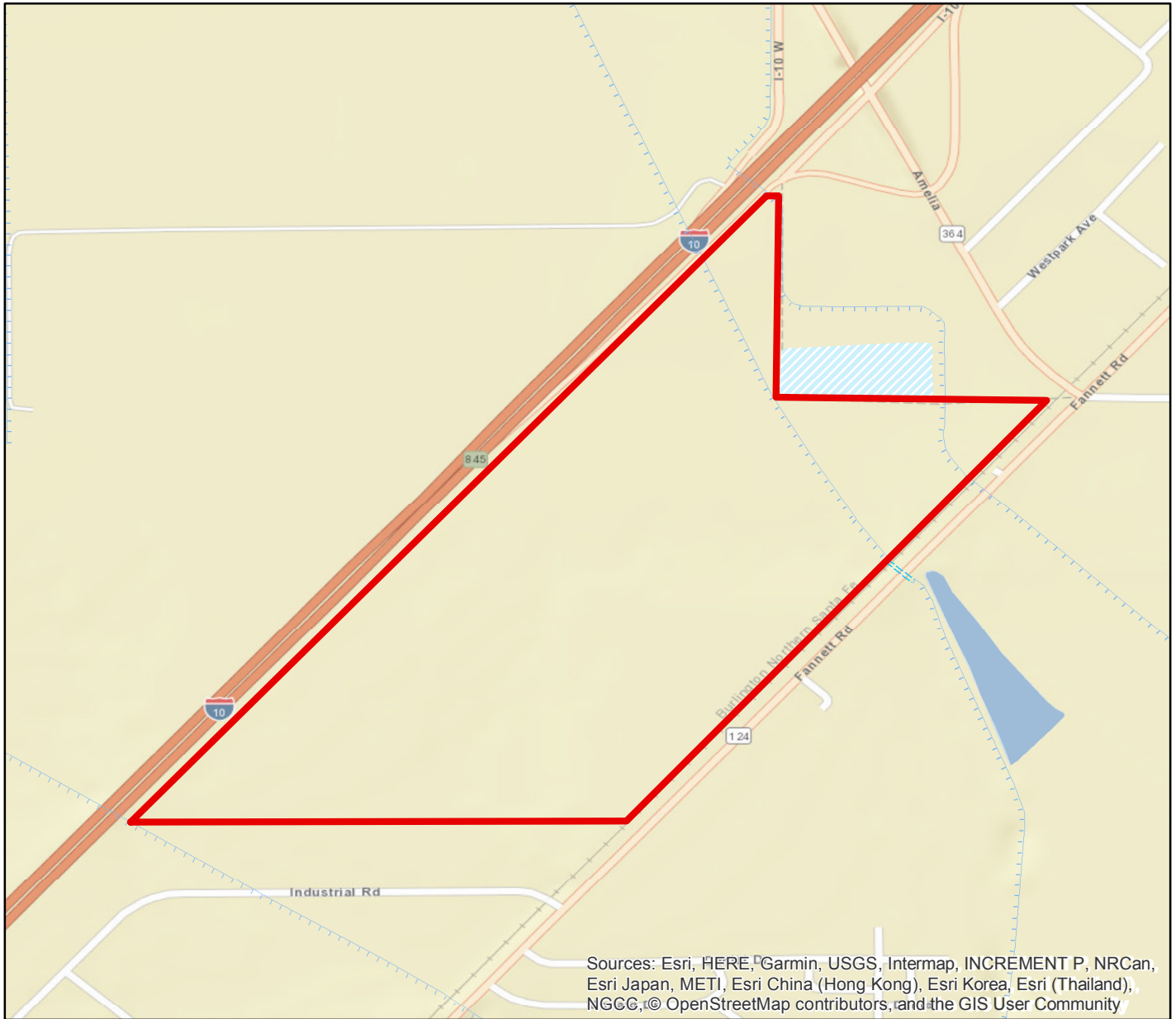


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TNRCC – Texas Natural Resource Conservation Commission  
TNRIS – Texas Natural Resource Information System  
TPH – Total Petroleum Hydrocarbons  
TSD – Treatment, Storage and Disposal (RCRA)  
TWC - Texas Water Commission  
TWDB - Texas Water Development Board  
USACOE – United State Army Corps of Engineers  
USDA – United States Department of Agriculture  
UST – Underground Storage Tank  
USGS – United States Geological Survey  
VCP – Voluntary Cleanup Program  
VEC – Vapor Encroachment Condition  
VOC – Volatile Organic Compounds  
WMU – Waste Management Unit

**APPENDIX I**

**CURRENT & HISTORICAL DOCUMENTATION**

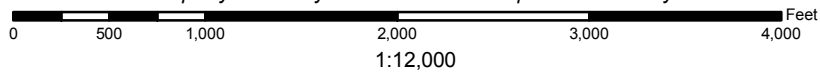


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

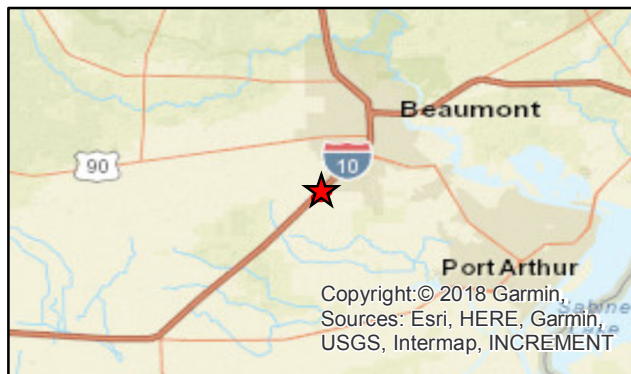
Source: USGS NHL, ESRI

Property boundary and locations are representative only.

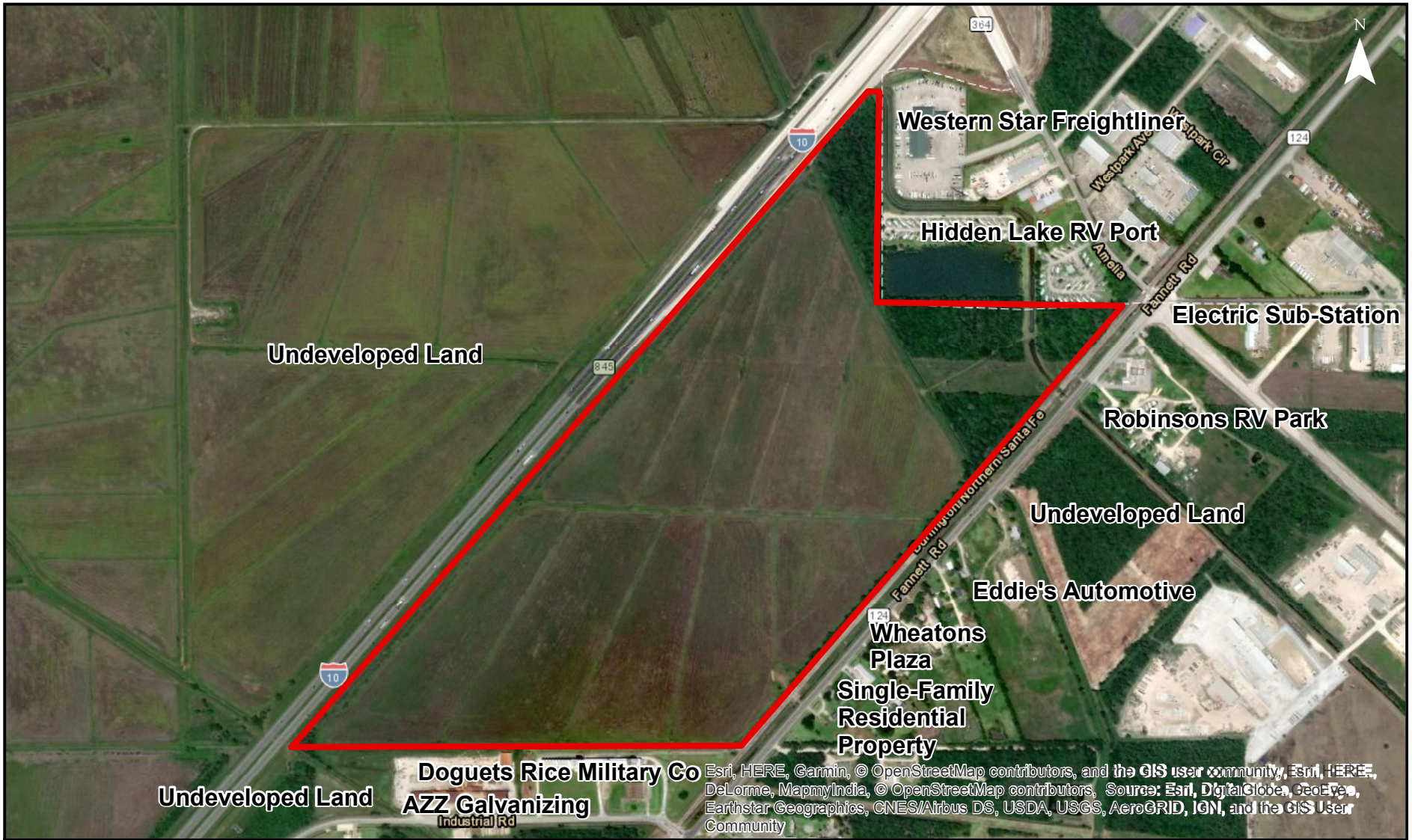
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## Location Map



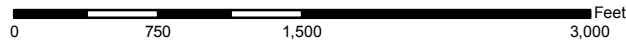
**Location: Approximately 183 acres along Interstate Highway 10  
Beaumont, TX 77705  
Jefferson County**



Source: GoogleEarth Pro

Note: Property location and boundary are representative only.

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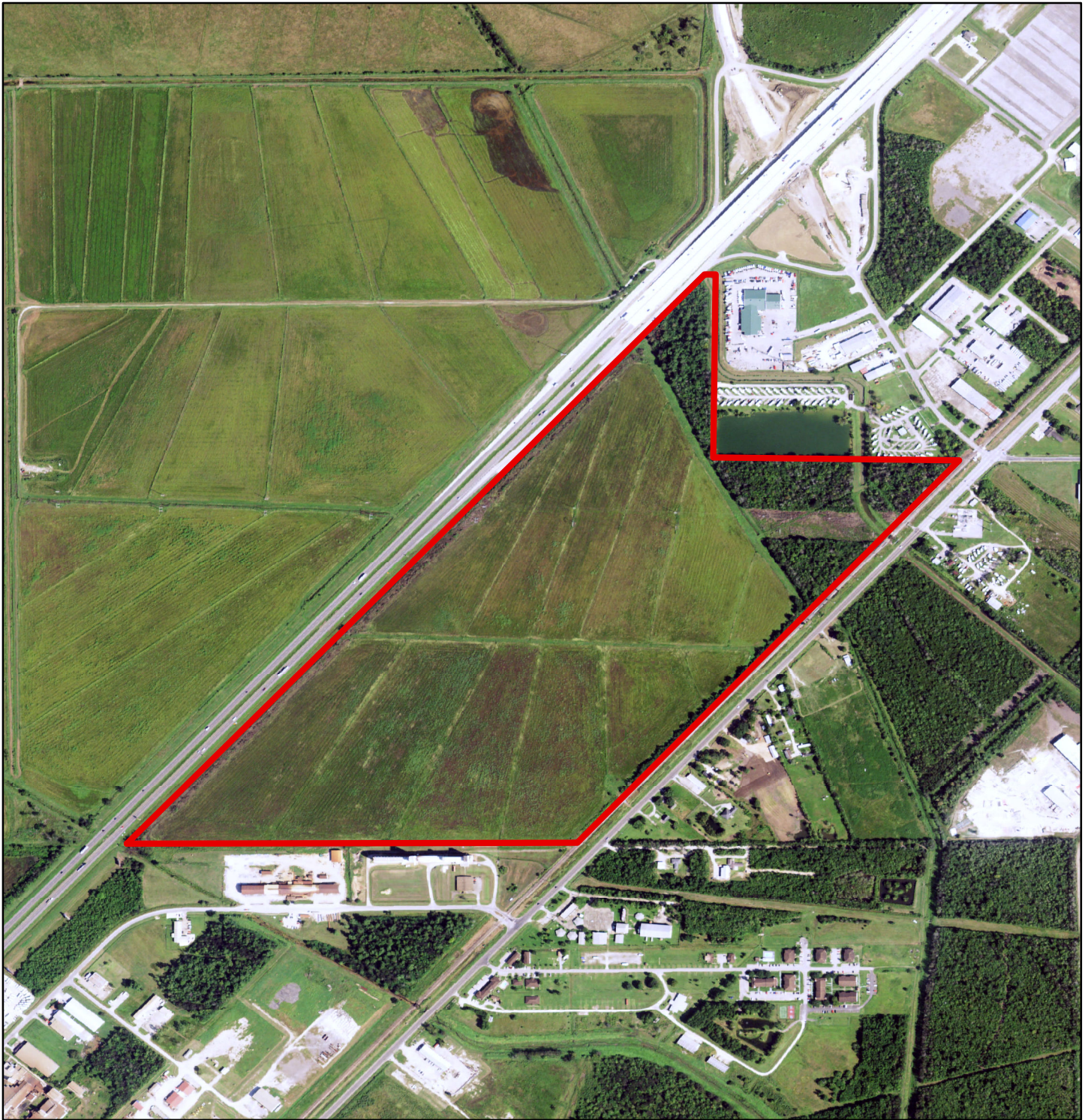
## SITE SKETCH

Subject Property

Location: Approximately 183 acres along Interstate Highway 10  
 Beaumont, TX 77705  
 Jefferson County

PEI Project No: 201806054

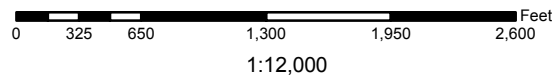
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Source: TNRIS

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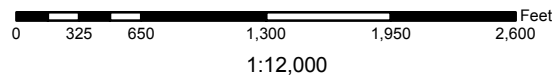
2016 NAIP Orthoimagery



Source: TNRIS

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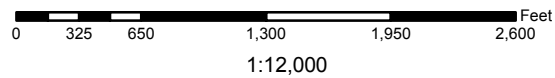
## 2006 High Resolution Orthoimagery



Source: TNRIS

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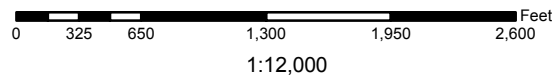
## 1995 Digital Orthophoto Mosaic



Source: TNRIS

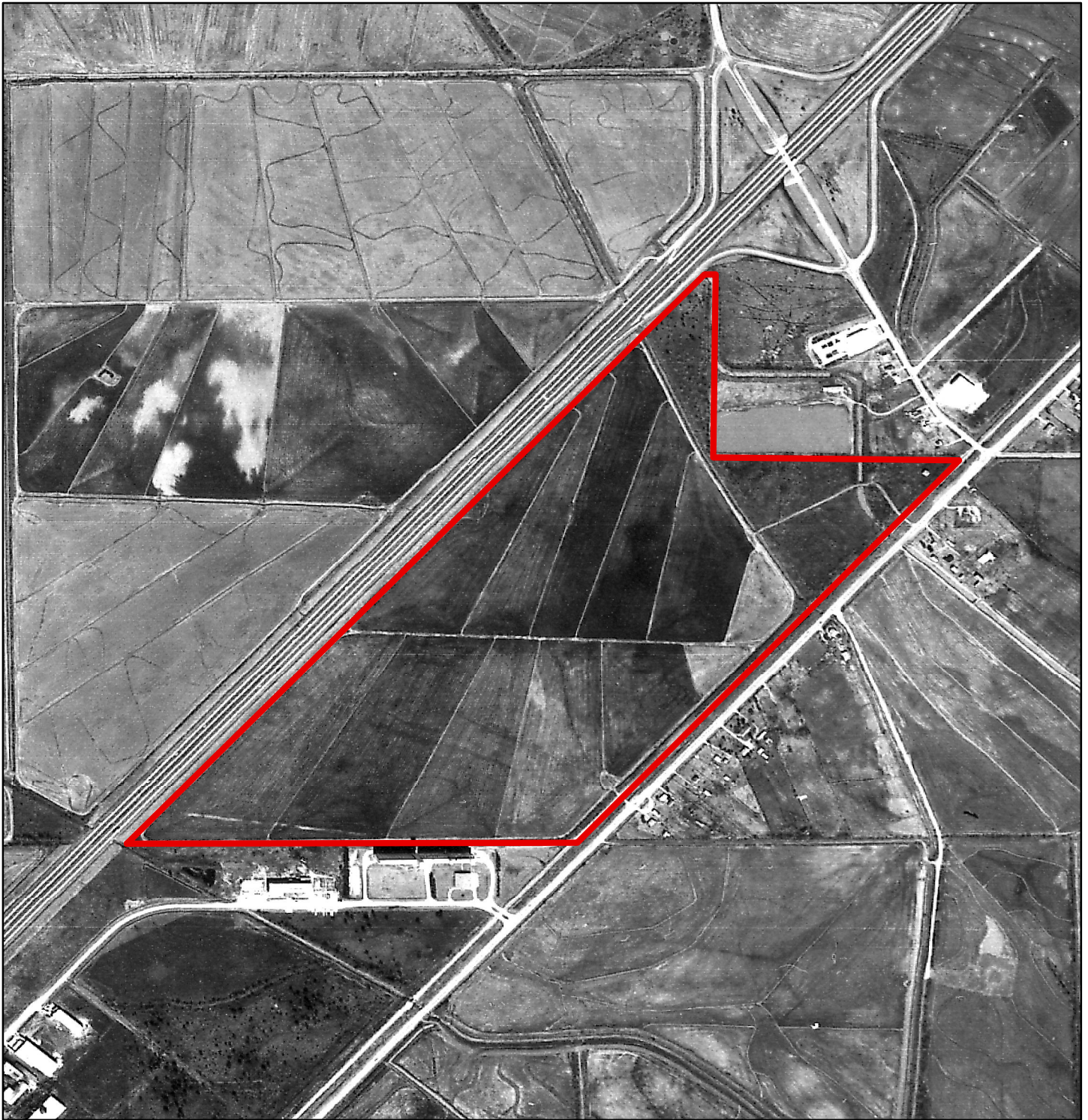
Property boundary and locations are representative only.

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## 1982 Aerial Photograph

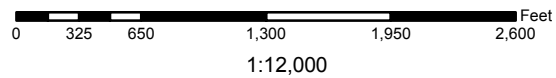




Source: TNRIS

Property boundary and locations are representative only.

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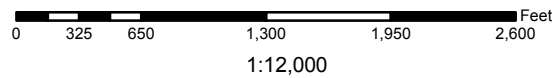
## 1979 Aerial Photograph



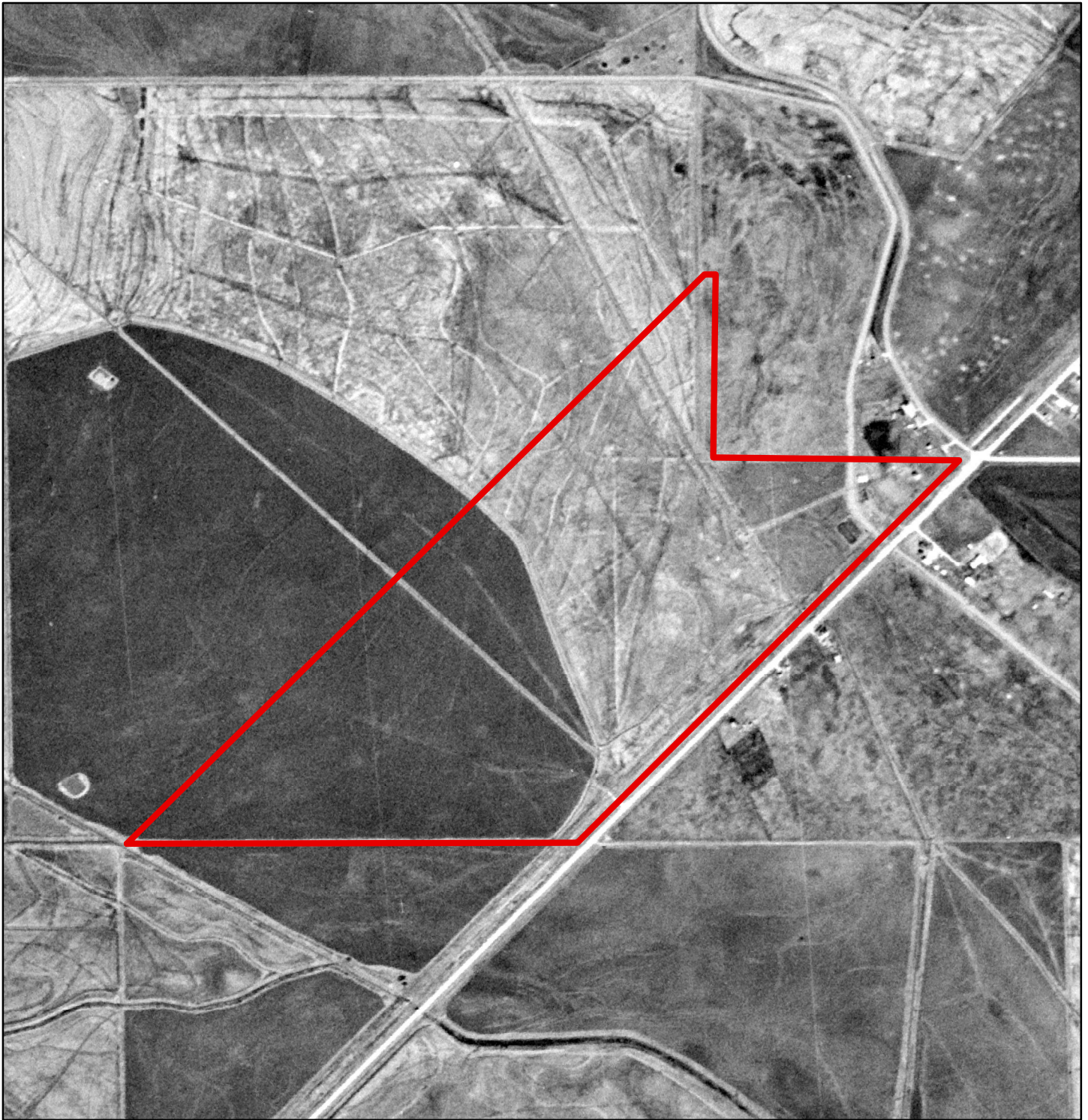
Source: TNRIS

Property boundary and locations are representative only.

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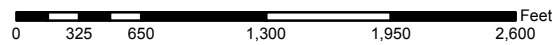
## 1960 Aerial Photograph



Source: TNRIS

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1:12,000



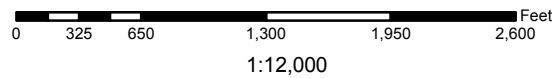
## 1953 Aerial Photograph



Source: TNRIS

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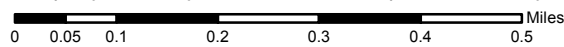
## 1938 Aerial Photograph



Source: The National Map

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1:12,000



## Topographic Map

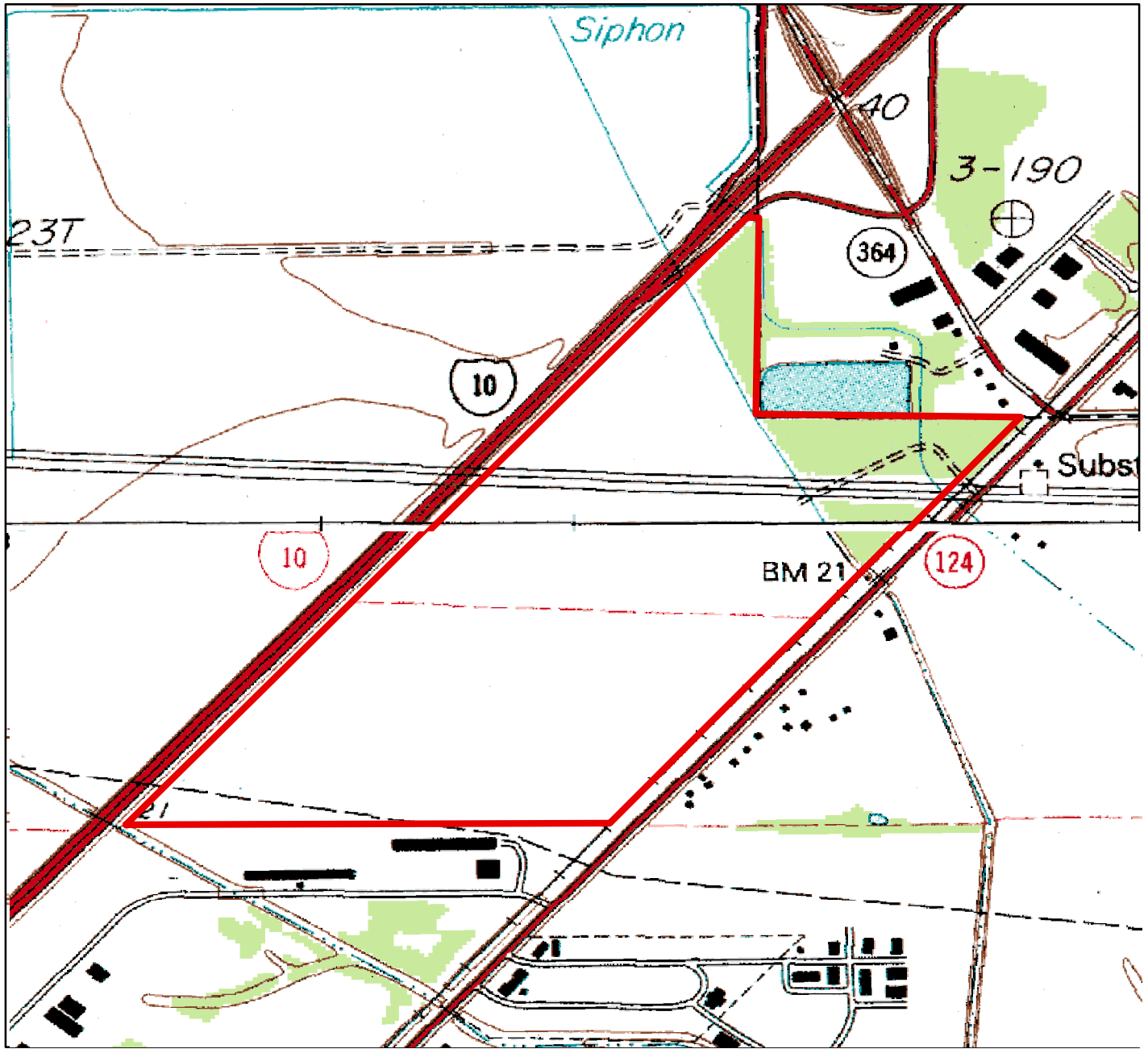
The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

Topographic maps usually portray both natural and manmade features. They show and name works of nature including mountains, valleys, plains, lakes, rivers, and vegetation. They also identify the principal works of man, such as roads, boundaries, transmission lines, and major buildings. The colors represent the following: Contours - brown, Hydrography - blue, Public Land Survey System and other surveys - red, Updates - purple/magenta, Miscellaneous - black, and Vegetation - green.

**USGS 7.5 Minute Topographic Series**  
**Beaumont West, 2016**  
**Fannett East, 2016**



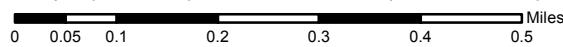
**PEI Project No: 201806054**



Source: The National Map

Property boundary and locations are representative only.

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1:12,000



## Topographic Map

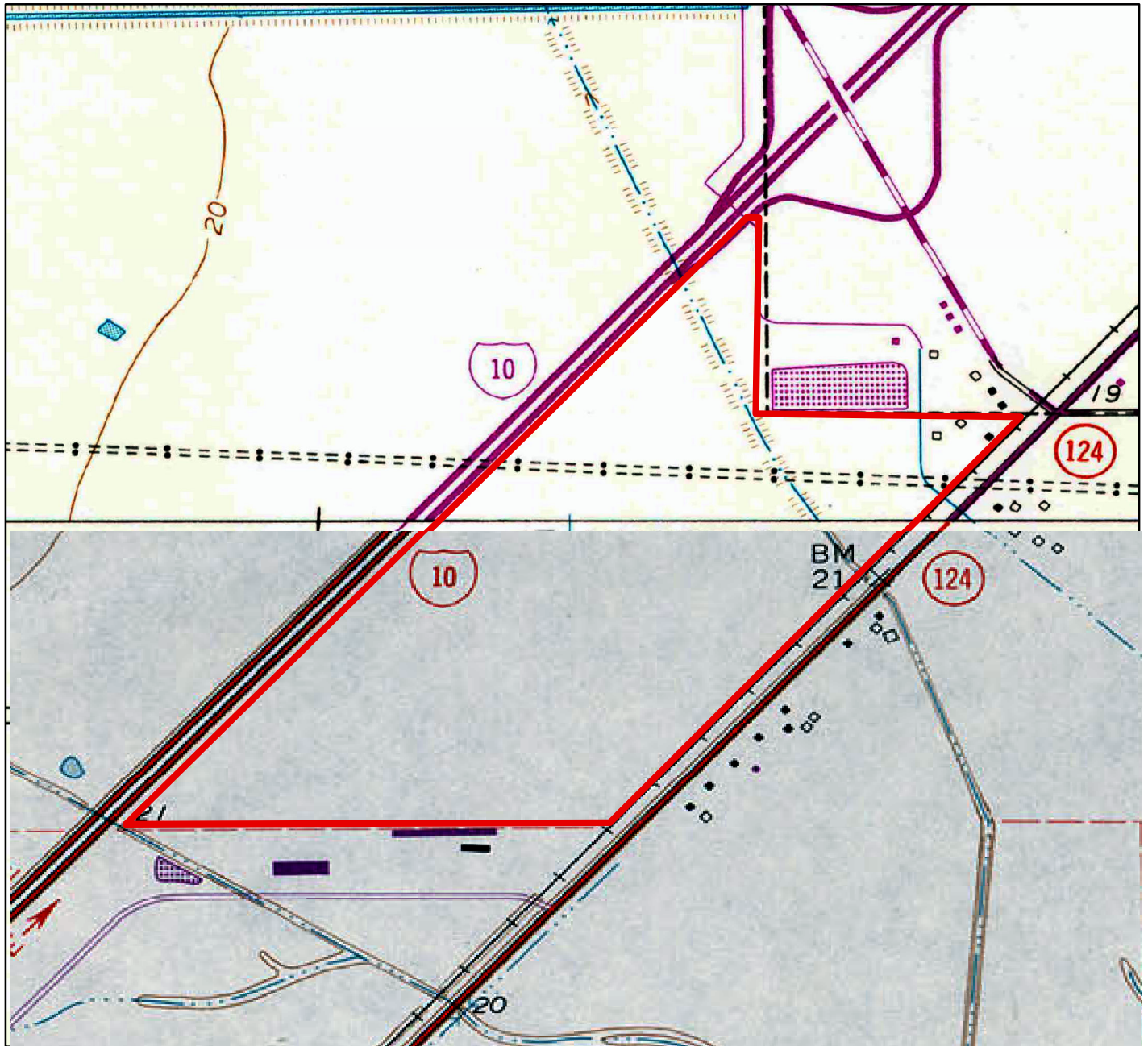
The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

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**USGS 7.5 Minute Topographic Series**  
**Beaumont West, 1994**  
**Fannett East, 1994**



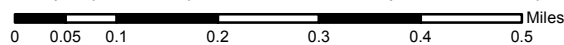
**PEI Project No: 201806054**



Source: The National Map

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1:12,000



## Topographic Map

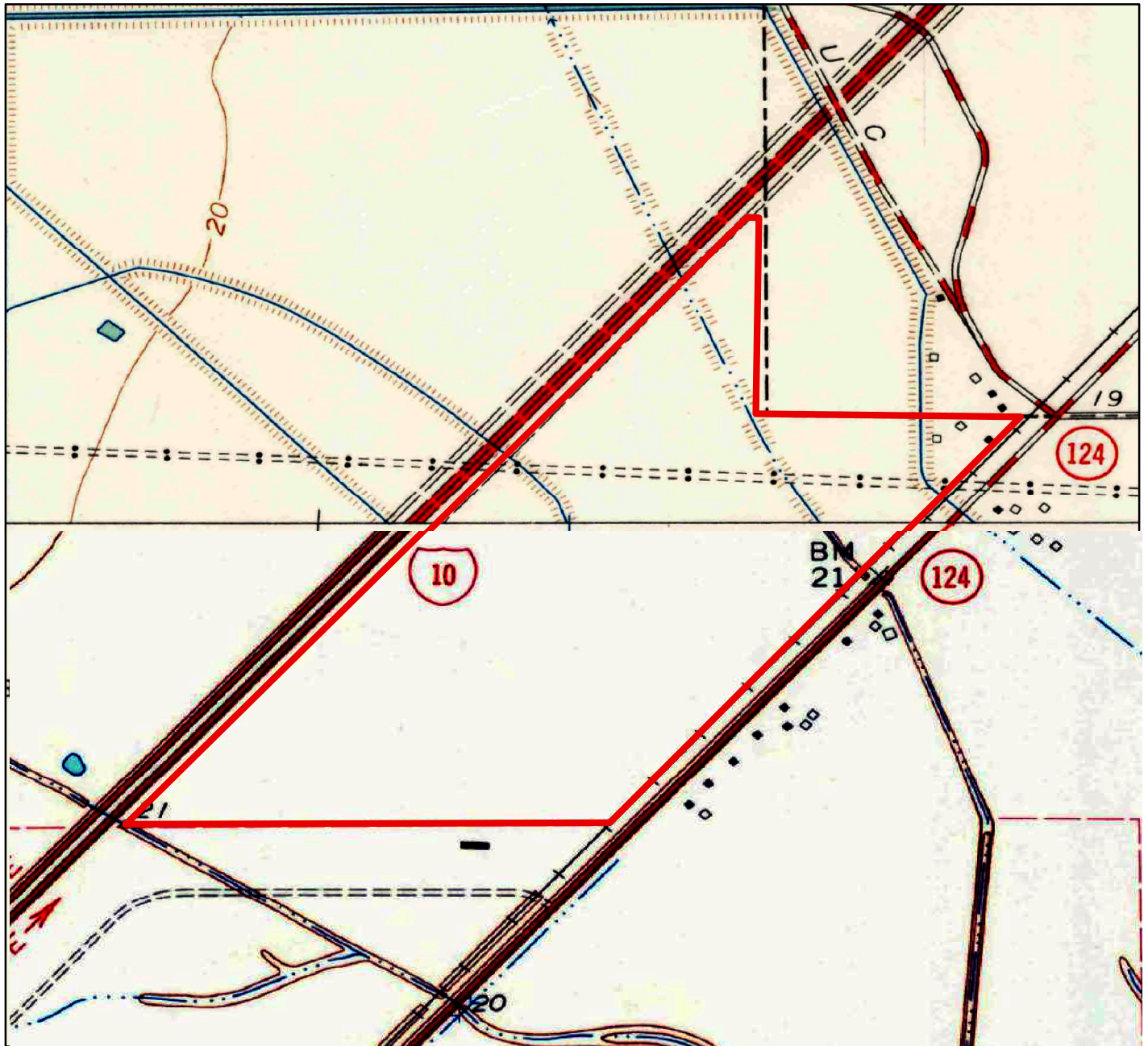
The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

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**USGS 7.5 Minute Topographic Series**  
**Beaumont West, 1974**  
**Fannett East, 1974**



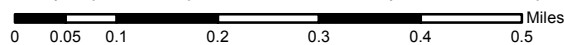
**PEI Project No: 201806054**



Source: The National Map

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## Topographic Map

The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

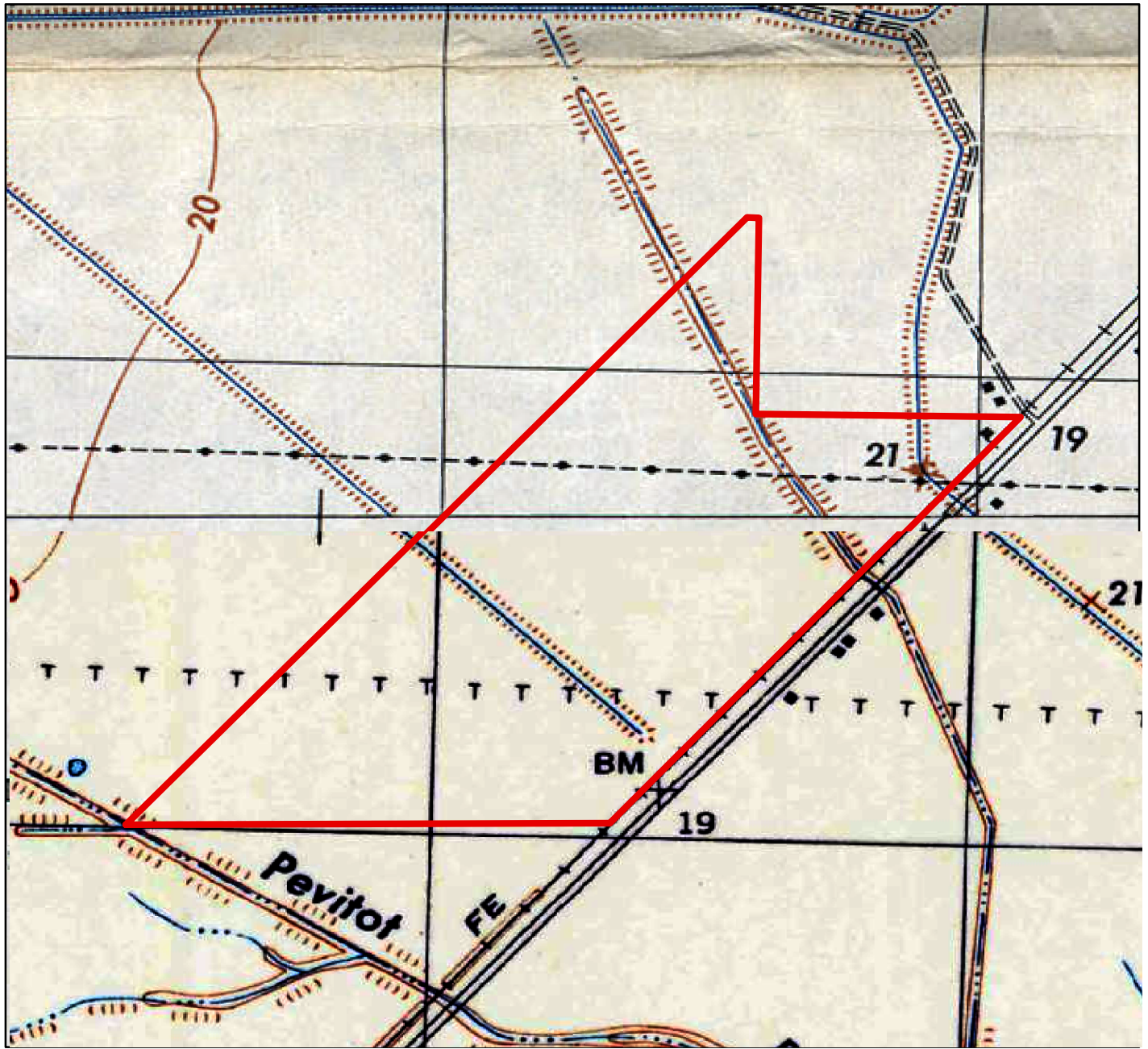
Topographic maps usually portray both natural and manmade features. They show and name works of nature including mountains, valleys, plains, lakes, rivers, and vegetation. They also identify the principal works of man, such as roads, boundaries, transmission lines, and major buildings. The colors represent the following: Contours - brown, Hydrography - blue, Public Land Survey System and other surveys - red, Updates - purple/magenta, Miscellaneous - black, and Vegetation - green.

**USGS 7.5 Minute Topographic Series**  
**Beaumont West, 1960**  
**Fannett East, 1962**



**PEI Project No: 201806054**

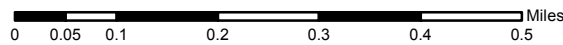




Source: The National Map

Property boundary and locations are representative only.

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1:12,000



## Topographic Map

The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

Topographic maps usually portray both natural and manmade features. They show and name works of nature including mountains, valleys, plains, lakes, rivers, and vegetation. They also identify the principal works of man, such as roads, boundaries, transmission lines, and major buildings. The colors represent the following: Contours - brown, Hydrography - blue, Public Land Survey System and other surveys - red, Updates - purple/magenta, Miscellaneous - black, and Vegetation - green.

**USGS 7.5 Minute Topographic Series**  
**Beaumont West, 1946**  
**Fannett East, 1945**



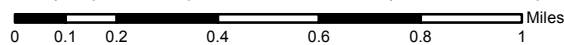
**PEI Project No: 201806054**



Source: The National Map

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1:24,000



## Topographic Map

The U.S. Geological Survey (USGS) produced its first topographic map in 1879, the same year it was established. Today, more than 100 years and millions of map copies later, topographic mapping is still a central activity for the USGS. The topographic map remains an indispensable tool for government, science, industry, and leisure.

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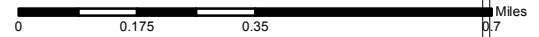
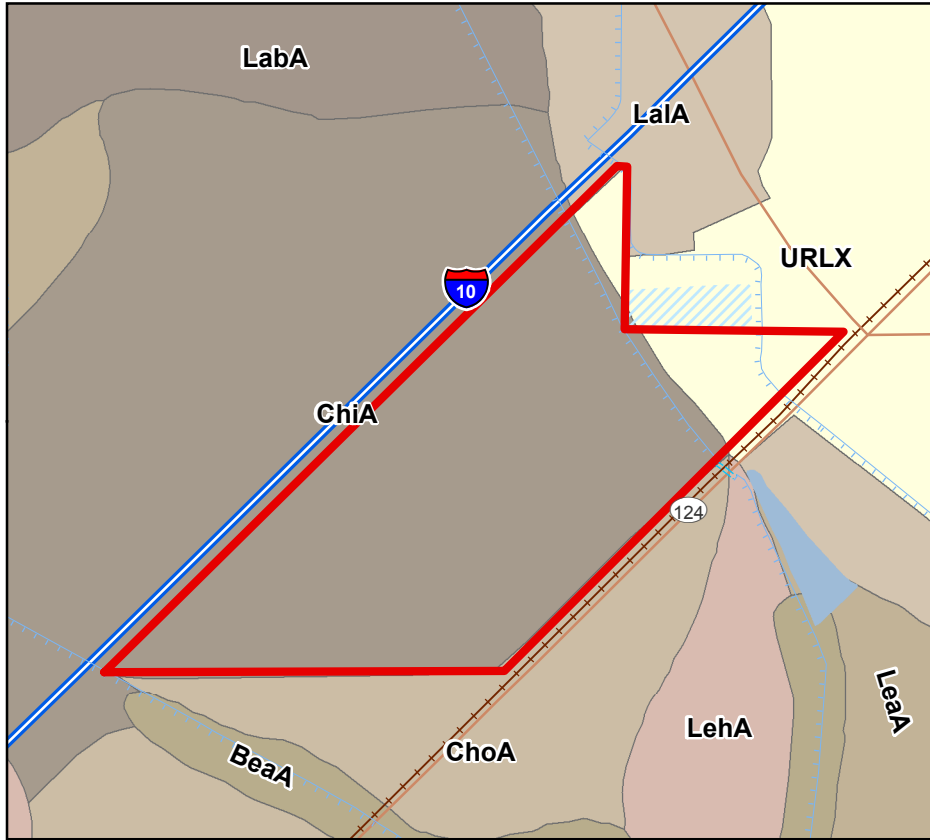
**USGS 15 Minute Topographic Series**  
**Beaumont West, 1921**  
**Fannett East, 1928**



**PEI Project No: 201806054**

## USDA NRCS SSURGO Database of Texas

The "Gridded Soil Survey Geographic (gSSURGO) Database State-tile Package" product is derived from the Soil Survey Geographic Database. SSURGO is generally the most detailed level of soil geographic data developed by the National Cooperative Soil Survey (NCSS) in accordance with NCSS mapping standards. SSURGO is designed to be used for broad planning and management uses.



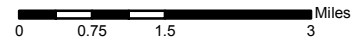
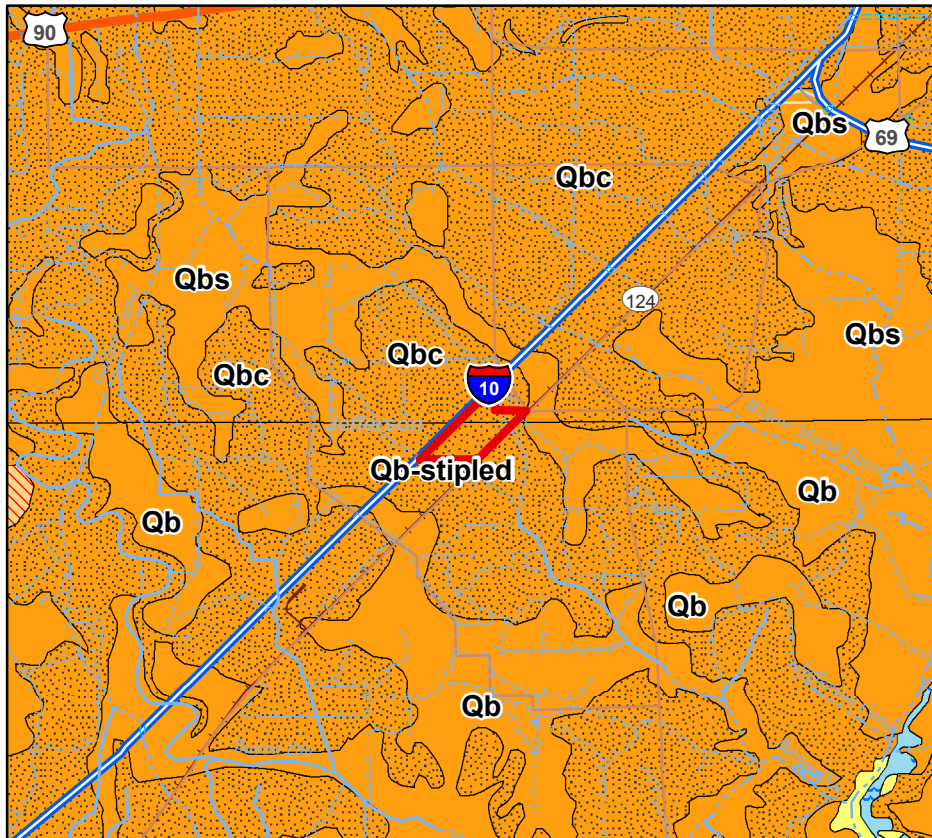
1:18,000



Sources: NRCS, USGS NHD

## Geologic Database of Texas

The Geologic Database of Texas was produced in cooperation with the US Geological Survey (USGS), and the Texas Water Development Board (TWDB) utilizing the 28 Geologic Atlas of Texas sheets (Texas Bureau of Economic Geology, Virgil Barnes, editor). These were compiled into separate geodatabases and then into a single Statewide Digital Geologic Atlas of Texas. This dataset is distributed through TNRIS.

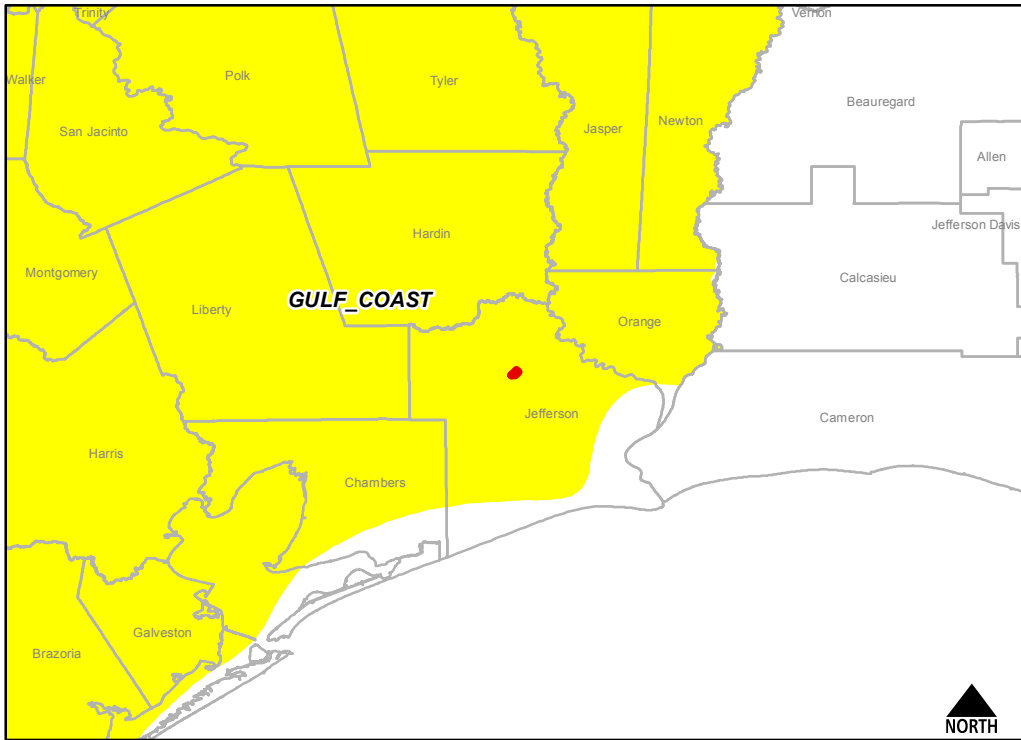


1:125,000



Sources: TNRIS, USGS NHD

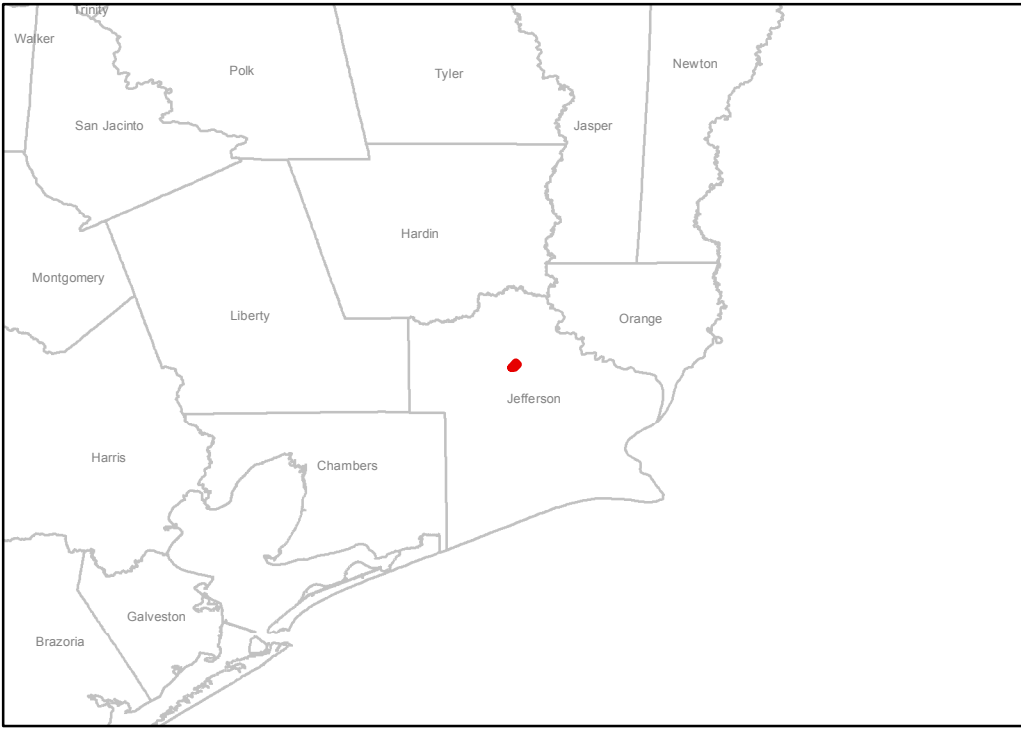
Copyright ©2016 Phase Engineering, Inc.



### Major Aquifers

- Pecos Valley
- Seymour
- Gulf Coast
- Carrizo - Wilcox (outcrop)
- Carrizo - Wilcox (subcrop)
- Hueco - Mesilla Bolson
- Ogallala
- Edwards - Trinity Plateau (outcrop)
- Edwards - Trinity Plateau (subcrop)
- Edwards BFZ (outcrop)
- Edwards BFZ (subcrop)
- Trinity (outcrop)
- Trinity (subcrop)

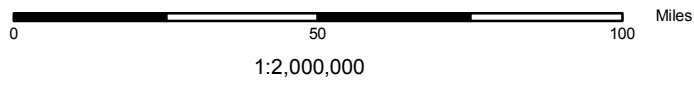
**NOTE:**  
 - *Aquifer chronology by geologic age*  
 - *Solid colors indicate OUTCROP areas (portion of a water-bearing rock unit exposed at the land surface).*  
 - *Hatch colored lines indicate SUBCROP areas (portion of a water-bearing rock unit existing below other rock units).*  
 - *The Edward-Trinity (High Plains) Aquifer and the Rita Blanca Aquifer are both entirely*



### Minor Aquifers

- Brazos River Alluvium
- West Texas Bolsons
- Lipan (outcrop)
- Lipan (subcrop)
- Yegua Jackson
- Igneous
- Sparta (outcrop)
- Sparta (subcrop)
- Queen City (outcrop)
- Queen City (subcrop)
- Nacatoch (outcrop)
- Nacatoch (subcrop)
- Blossom (outcrop)
- Blossom (subcrop)
- Woodbine (outcrop)
- Woodbine (subcrop)
- Rita Blanca
- Edwards - Trinity (High Plains)
- Dockum (outcrop)
- Dockum (subcrop)
- Rustler (outcrop)
- Rustler (subcrop)
- Capitan Reef Complex
- Blaine (outcrop)
- Blaine (subcrop)
- Bone Spring - Victoria Peak
- Marble Falls
- Marathon
- Ellenburger - San Saba (outcrop)
- Ellenburger - San Saba (subcrop)
- Hickory (outcrop)
- Hickory (subcrop)
- Cross Timbers

source: TWDB, ESRI  
 Copyright ©2016 Phase Engineering, Inc.

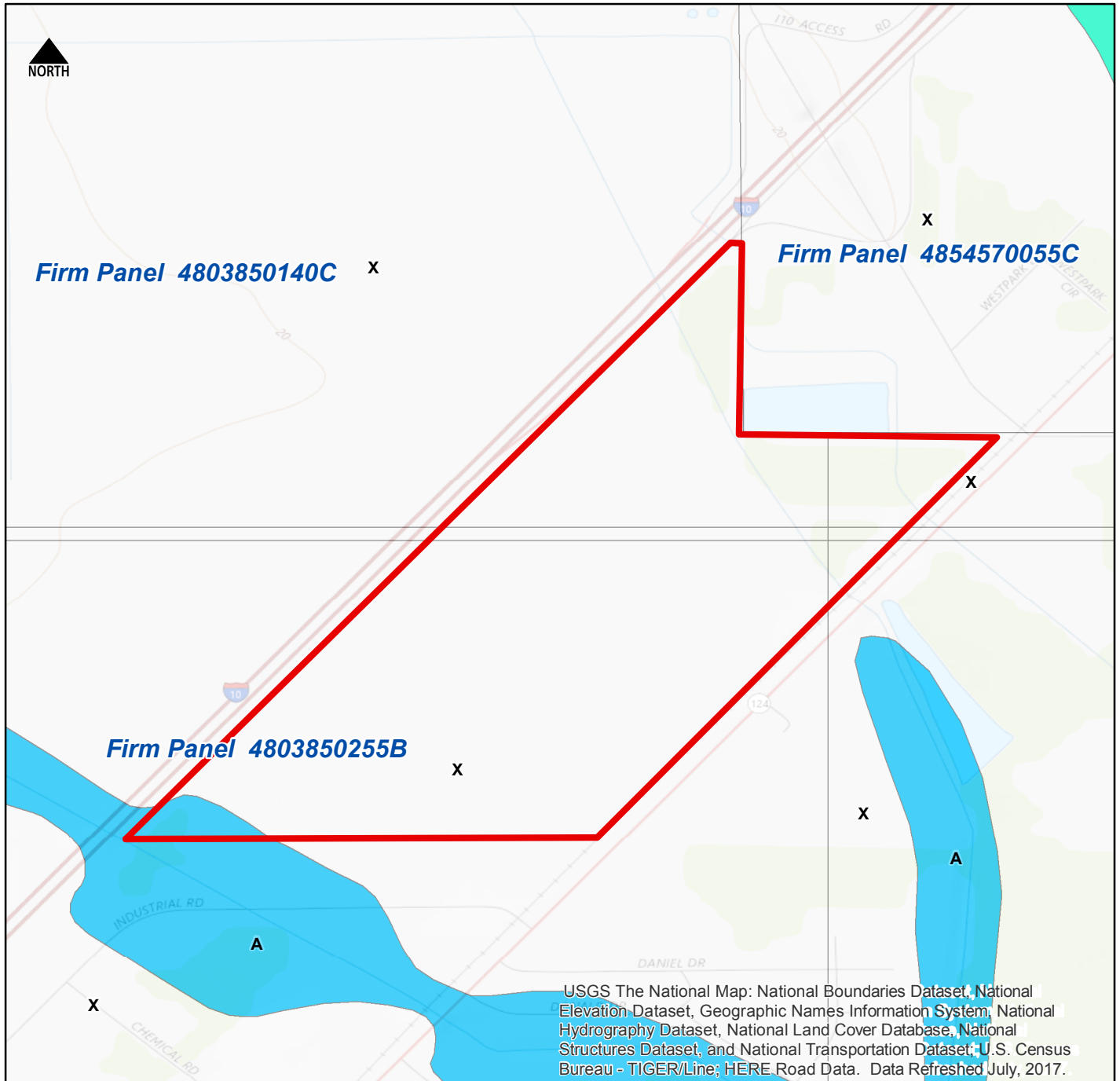


## Texas Aquifer Zones - TWDB 2017 State Water Plan

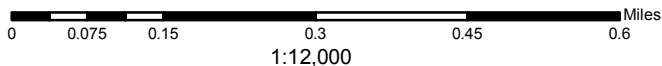
The Texas Water Development Board (TWDB) has identified and characterized 9 major and 22 minor aquifers in the state based on the quality of water supplied by each. A major aquifer is generally defined as supplying large quantities of water in small areas or relatively small quantities in large areas. The major and minor aquifers, as presently defined, underlie approximately 81 percent of the state. Lesser quantities of water may also be found in the remainder of the state.



PEI Project No: 201806054



Source: TNRIS



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## FEMA Q3 Flood Data

The FEMA Q3 Flood data were developed by scanning the existing FIRM hardcopies that were generated in the mid 1980s. Most have never been updated. Only 133 out of 254 counties in Texas were mapped. The maps should be considered an advisory tool for general hazard awareness, education, and flood plain management.

### Zones A, AE, AH, V and VE

Special Flood Hazard Areas subject to inundation by the 1% Annual Chance Flood Event. The 1% annual chance is also known as the 100-year flood or base flood and has a 1% chance of being equaled or exceeded in any given year.

### Zone X500

Other Flood Areas - Areas of 0.2% (500-year) annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than less than 1 square mile; and areas protected by levees from 1% annual chance flood.

### Zone X

Other Areas - Areas determined to be outside the 0.2% (500-year) annual chance floodplain.

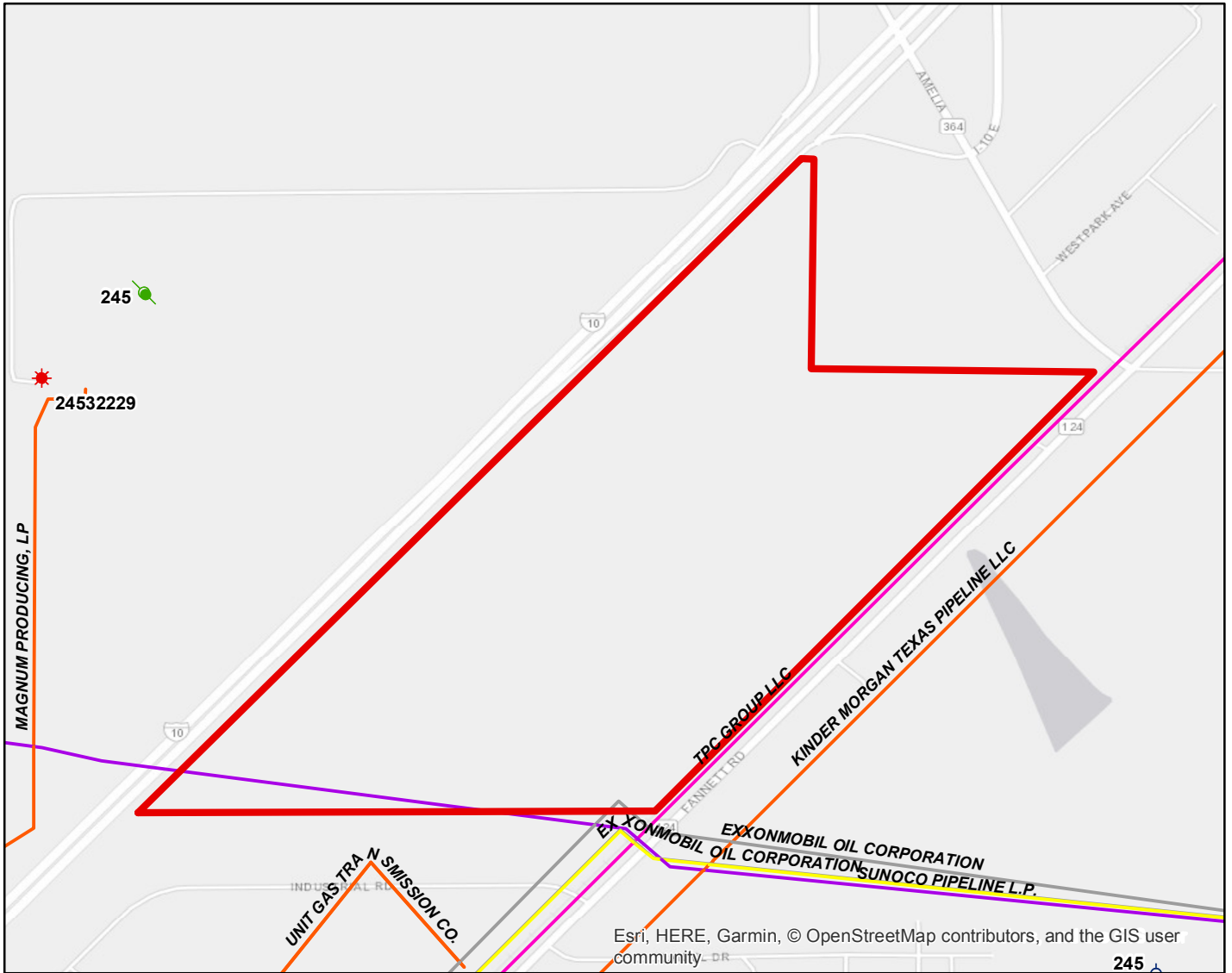
### Floodway

Floodway Areas in Zone AE - The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

### Zone D

Undetermined Risk Areas - Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.

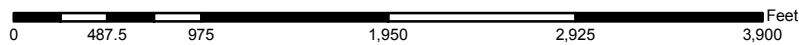
### Area Not Included



Source: TxRRC, USGS NHD, ESRI

Property boundary and locations are representative only.

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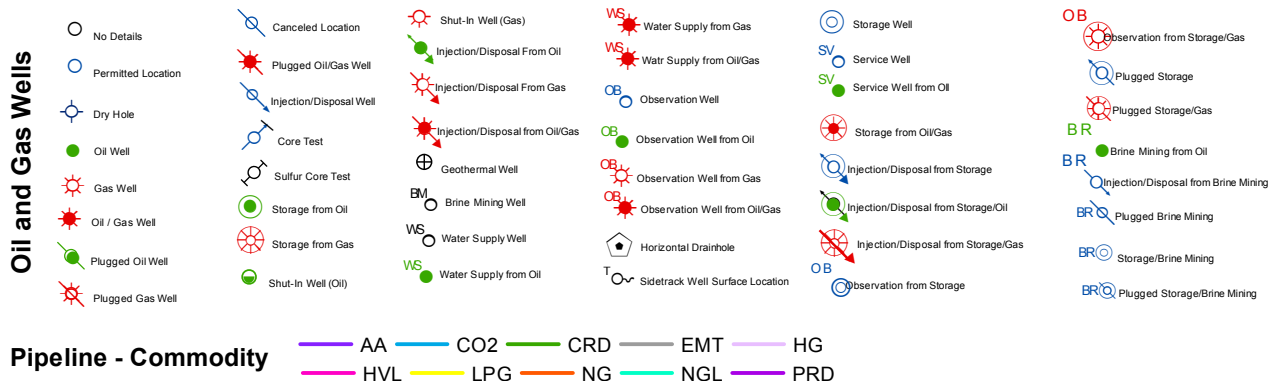


1:12,000



## Texas Railroad Commission Digital Well Location and Pipeline Mapping

Oil and gas well data and pipeline datasets were generated by the Geographic Information System of the Railroad Commission of Texas from public records at the Railroad Commission of Texas (the Commission). The Commission makes no representation, guarantee or warranty as to the accuracy, completeness, currency, or suitability of these data sets, which are provided "AS IS."



## GIS Identify Results - Pipeline Attributes

<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	SUNOCO PIPELINE L.P.
<b>COMMODITY</b>	CRUDE OIL
<b>COMMODITY DESCRIPTION</b>	CRUDE OIL
<b>SYSTEM TYPE</b>	Crude Transmission
<b>SYSTEM NAME</b>	SXL INTRASTATE
<b>DIAMETER</b>	12.75
<b>P5 NUMBER</b>	829627
<b>T4PERMIT</b>	00582
<b>T4PERMIT MILES</b>	23.07
<b>STATUS</b>	In Service
<b>INTERSTATE</b>	No

## GIS Identify Results - Pipeline Attributes

<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	KINDER MORGAN TEXAS PIPELINE LLC
<b>COMMODITY</b>	NATURAL GAS
<b>COMMODITY DESCRIPTION</b>	NATURAL GAS
<b>SYSTEM TYPE</b>	Gas Transmission
<b>SYSTEM NAME</b>	KMTP
<b>SUBSYSTEM NAME</b>	WILLOW SLOUGH
<b>DIAMETER</b>	10.75
<b>P5 NUMBER</b>	463345
<b>T4PERMIT</b>	00762
<b>T4PERMIT MILES</b>	19.3
<b>STATUS</b>	In Service
<b>INTERSTATE</b>	No



## GIS Identify Results - Pipeline Attributes

<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	TPC GROUP LLC
<b>COMMODITY</b>	BUTADIENE
<b>COMMODITY DESCRIPTION</b>	BUTADIENE
<b>SYSTEM TYPE</b>	Highly Volatile Liquids (Propa
<b>SYSTEM NAME</b>	TEXAS PETROCHEMICALS -322
<b>DIAMETER</b>	4.5
<b>P5 NUMBER</b>	863639
<b>T4PERMIT</b>	07420
<b>T4PERMIT MILES</b>	15.540000000000001
<b>STATUS</b>	In Service
<b>INTERSTATE</b>	No

## GIS Identify Results - Pipeline Attributes

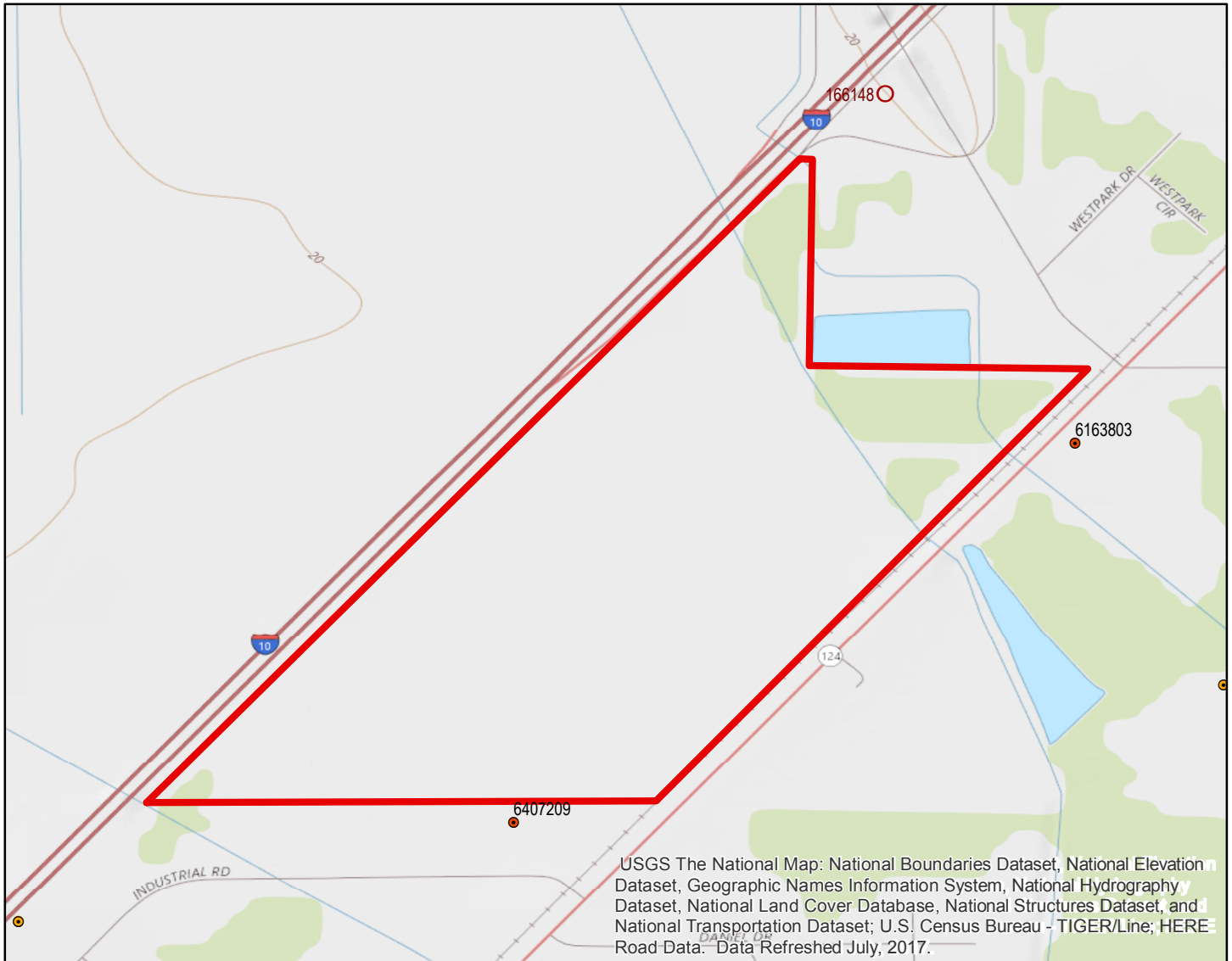
<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	MAGNUM PRODUCING, LP
<b>COMMODITY</b>	NATURAL GAS
<b>COMMODITY DESCRIPTION</b>	NATURAL GAS
<b>SYSTEM TYPE</b>	Gas Gathering
<b>SYSTEM NAME</b>	PIPKIN #1 TO WILLIS #1 PIPELINE
<b>DIAMETER</b>	4.5
<b>P5 NUMBER</b>	521516
<b>T4PERMIT</b>	06909
<b>T4PERMIT MILES</b>	0.8
<b>STATUS</b>	In Service
<b>INTERSTATE</b>	No

## GIS Identify Results - Pipeline Attributes

<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	UNIT GAS TRANSMISSION CO.
<b>COMMODITY</b>	NATURAL GAS
<b>COMMODITY DESCRIPTION</b>	NATURAL GAS
<b>SYSTEM TYPE</b>	Gas Transmission
<b>SYSTEM NAME</b>	UNIT GAS TRANS. LINE
<b>DIAMETER</b>	6.63
<b>P5 NUMBER</b>	877095
<b>T4PERMIT</b>	00897
<b>T4PERMIT MILES</b>	0.8300000000000001
<b>STATUS</b>	Abandoned
<b>INTERSTATE</b>	No

## GIS Identify Results - Pipeline Attributes

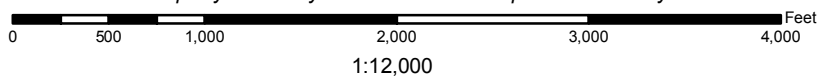
<b>COUNTY_FIPS</b>	245
<b>OPERATOR</b>	EXXONMOBIL OIL CORPORATION
<b>COMMODITY</b>	PROPYLENE POLYMER
<b>COMMODITY DESCRIPTION</b>	PROPYLENE POLYMER
<b>SYSTEM TYPE</b>	Highly Volatile Liquids (Propa
<b>SYSTEM NAME</b>	MC-62,62A,BMT - ORNG, PROP
<b>SUBSYSTEM NAME</b>	GOODYEAR - BEAUMONT S-100-MC-47
<b>DIAMETER</b>	4.5
<b>P5 NUMBER</b>	257155
<b>T4PERMIT</b>	07809
<b>T4PERMIT MILES</b>	11.18
<b>STATUS</b>	In Service
<b>INTERSTATE</b>	No



Source: USGS NWIS, TCEQ, TWDB, ESRI

Property boundary and locations are representative only.

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## Texas Water Wells with MSD and Superfund Site Boundaries

### TCEQ Public Water Supply Wells (PWS)

The public water systems data was developed to support the TCEQ's Source Water Assessment and Protection Program (SWAP). The locations were obtained by the Water Supply Division as recorded from various sources. This layer was built using the best existing location data available but some errors still remain.

### USGS National Water Inventory System (NWIS)

The National Water Information System (NWIS) provides access to USGS water data at over 1.5 million sites. This extensive database for the nation includes the occurrence, quantity, quality, distribution and movement of surface and underground waters.

### TWDB Groundwater Database (GWDB)

The Groundwater Database (GWDB) of the Texas Water Development Board (TWDB) contains information about more than 130,000 water well, spring, and oil/gas test sites in Texas including associated water level and water quality data. Because data collection methods and data maintenance have varied and evolved over the years, the information in the GWDB has a range of accuracy.

### TWDB Brackish Groundwater (BRACS)

The Brackish Resources Aquifer Characterization System (BRACS) Database was designed to store well and geology information in support of projects to characterize the brackish groundwater resources of Texas. Brackish groundwater contains dissolved minerals in the range of 1,000 to 9,999 milligrams per liter (mg/L).

### TWDB Submitted Drillers Reports Database (SDRDB)

#### Well Locations

The Submitted Driller's Report Database is populated from the online Texas Well Report Submission and Retrieval System which is a cooperative Texas Department of Licensing and Regulation (TDLR) and Texas Water Development Board (TWDB) application that registered water-well drillers use to submit their required reports. This system was started 2/5/2001 and began collecting all reports in 2003.

#### Plugging Locations

#### TCEQ MSD Boundary

An MSD is an official state designation given to property within a municipality or its extraterritorial jurisdiction that certifies that designated groundwater at the property is not used as potable water, and is prohibited from future use as potable water because that groundwater is contaminated in excess of the applicable potable-water protective concentration level. The prohibition must be in the form of a city ordinance, or a restrictive covenant that is enforceable by the city and filed in the property records.

#### State and Federal Superfund Sites

TCEQ Superfund Sites includes both State and Federal sites in the State of Texas that have been designated as Superfund cleanup sites. Federal Superfund sites have a Hazardous Ranking System score of 28.5 or above and are also on the NPL.

[GWDB Reports and Downloads](#)

**Well Basic Details**

[Scanned Documents](#)

State Well Number	6407209
County	Jefferson
River Basin	Neches-Trinity
Groundwater Management Area	14
Regional Water Planning Area	I - East Texas
Groundwater Conservation District	
Latitude (decimal degrees)	29.994445
Latitude (degrees minutes seconds)	29° 59' 40" N
Longitude (decimal degrees)	-94.194167
Longitude (degrees minutes seconds)	094° 11' 39" W
Coordinate Source	+/- 5 Seconds
Aquifer Code	112CHCTU - Chicot Aquifer, Upper
Aquifer	Gulf Coast
Aquifer Pick Method	
Land Surface Elevation (feet above sea level)	21
Land Surface Elevation Method	Interpolated From Topo Map
Well Depth (feet below land surface)	150
Well Depth Source	Another Government Agency
Drilling Start Date	
Drilling End Date	0/0/1962
Drilling Method	
Borehole Completion	

Well Type	Withdrawal of Water
Well Use	Industrial
Water Level Observation	Miscellaneous Measurements
Water Quality Available	Yes
Pump	Jet
Pump Depth (feet below land surface)	
Power Type	Electric Motor
Annular Seal Method	
Surface Completion	
Owner	American Rice Growers Coop Association
Driller	Green Brothers
Other Data Available	
Well Report Tracking Number	
Plugging Report Tracking Number	
U.S. Geological Survey Site Number	
Texas Commission on Environmental Quality Source Id	
Groundwater Conservation District Well Number	
Owner Well Number	
Other Well Number	
Previous State Well Number	
Reporting Agency	U.S. Geological Survey
Created Date	
Last Update Date	

Remarks

**Casing - No Data**

**Well Tests - No Data**

**Lithology - No Data**

**Annular Seal Range - No Data**

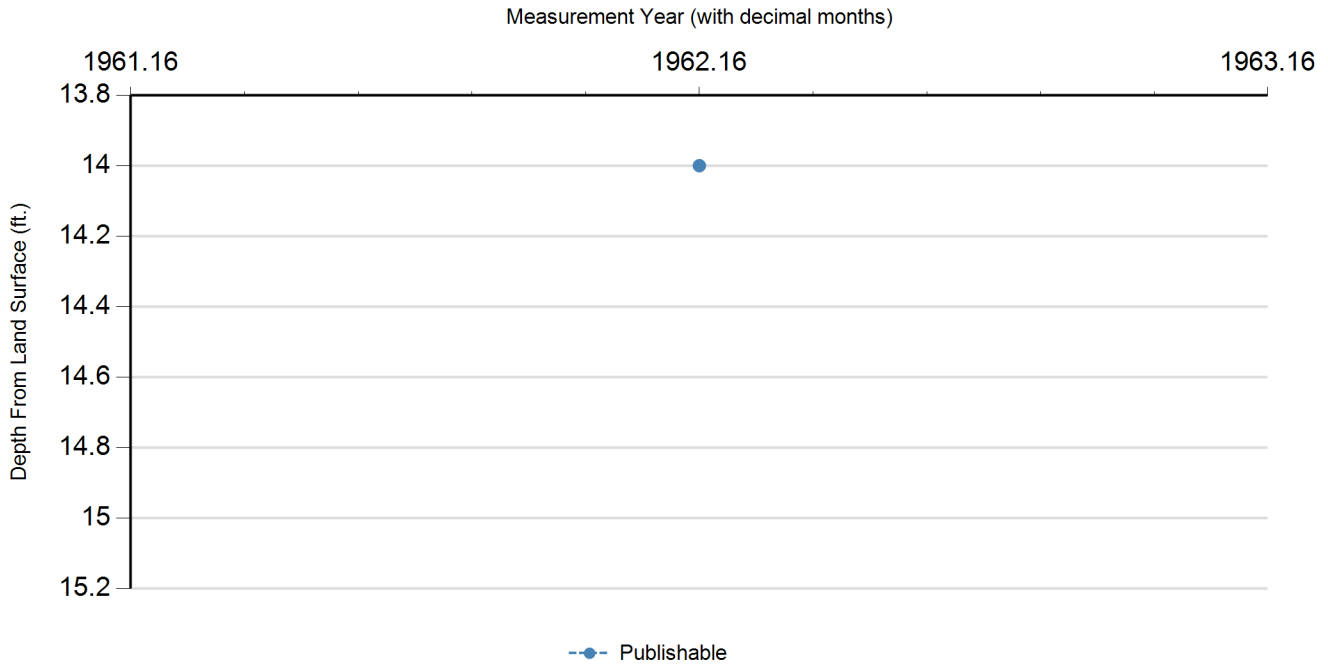
**Borehole - No Data**

**Plugged Back - No Data**

**Filter Pack - No Data**

**Packers - No Data**

### Water Level Measurements



Status Code	Date	Time	Water Level (ft. below land surface)	Change value in ( ) indicates rise in level	Water Elevation (ft. above sea level)	Meas #	Measuring Agency	Method	Remark ID	Comments
P	0/0/1962		14		7	1	Other or Source of Measurement Unknown	Unknown		

### Code Descriptions

Status Code	Status Description
P	Publishable

### Water Quality Analysis

**Sample Date:** 9/14/1966    **Sample Time:** 0000    **Sample Number:** 1    **Collection Entity:** U.S. Geological Survey  
**Sampled Aquifer:** Chicot Aquifer, Upper  
**Analyzed Lab:** U.S. Geological Survey Lab    **Reliability:** Collected from pumped well, but not filtered or preserved  
**Collection Remarks:** No Data

Parameter Code	Parameter Description	Flag	Value*	Units	Plus/Minus
00415	ALKALINITY, PHENOLPHTHALEIN (MG/L)		0	mg/L	
00410	ALKALINITY, TOTAL (MG/L AS CaCO3)		370.49	mg/L	
00440	BICARBONATE ION, CALCULATED (MG/L AS HCO3)		452	mg/L	
00445	CARBONATE ION, CALCULATED (MG/L AS CO3)		0	mg/L	
00940	CHLORIDE, TOTAL (MG/L AS CL)		1026	mg/L	
00900	HARDNESS, TOTAL, CALCULATED (MG/L AS CaCO3)		324	mg/L	
00400	PH (STANDARD UNITS), FIELD		7.8	SU	
00094	SPECIFIC CONDUCTANCE, FIELD (UMHOS/CM AT 25C)		3770	MICR	

\* Value may not display all significant digits for parameter in results, check Scanned Documents for laboratory paperwork..

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[GWDB Reports and Downloads](#)

**Well Basic Details**

[Scanned Documents](#)

State Well Number	6163803
County	Jefferson
River Basin	Neches-Trinity
Groundwater Management Area	14
Regional Water Planning Area	I - East Texas
Groundwater Conservation District	
Latitude (decimal degrees)	30.000834
Latitude (degrees minutes seconds)	30° 00' 03" N
Longitude (decimal degrees)	-94.184722
Longitude (degrees minutes seconds)	094° 11' 05" W
Coordinate Source	+/- 5 Seconds
Aquifer Code	112CHCTU - Chicot Aquifer, Upper
Aquifer	Gulf Coast
Aquifer Pick Method	
Land Surface Elevation (feet above sea level)	19
Land Surface Elevation Method	Interpolated From Topo Map
Well Depth (feet below land surface)	24
Well Depth Source	Another Government Agency
Drilling Start Date	
Drilling End Date	0/0/1938
Drilling Method	Dug
Borehole Completion	

Well Type	Withdrawal of Water
Well Use	Stock
Water Level Observation	None
Water Quality Available	Yes
Pump	Centrifugal Pump
Pump Depth (feet below land surface)	
Power Type	Electric Motor
Annular Seal Method	
Surface Completion	
Owner	Fred Zoch
Driller	William Peat
Other Data Available	
Well Report Tracking Number	
Plugging Report Tracking Number	
U.S. Geological Survey Site Number	
Texas Commission on Environmental Quality Source Id	
Groundwater Conservation District Well Number	
Owner Well Number	
Other Well Number	
Previous State Well Number	
Reporting Agency	U.S. Geological Survey
Created Date	2/19/1997
Last Update Date	2/19/1997

Remarks | Dug well.

**Casing - No Data**

**Well Tests - No Data**

**Lithology - No Data**

**Annular Seal Range - No Data**

**Borehole - No Data**

**Plugged Back - No Data**

**Filter Pack - No Data**

**Packers - No Data**

---

**Water Level Measurements**

No Data Available

### Water Quality Analysis

**Sample Date:** 4/1/1941    **Sample Time:** 0000    **Sample Number:** 1    **Collection Entity:** Texas Department of Health

**Sampled Aquifer:** Chicot Aquifer, Upper

**Analyzed Lab:** University of Texas

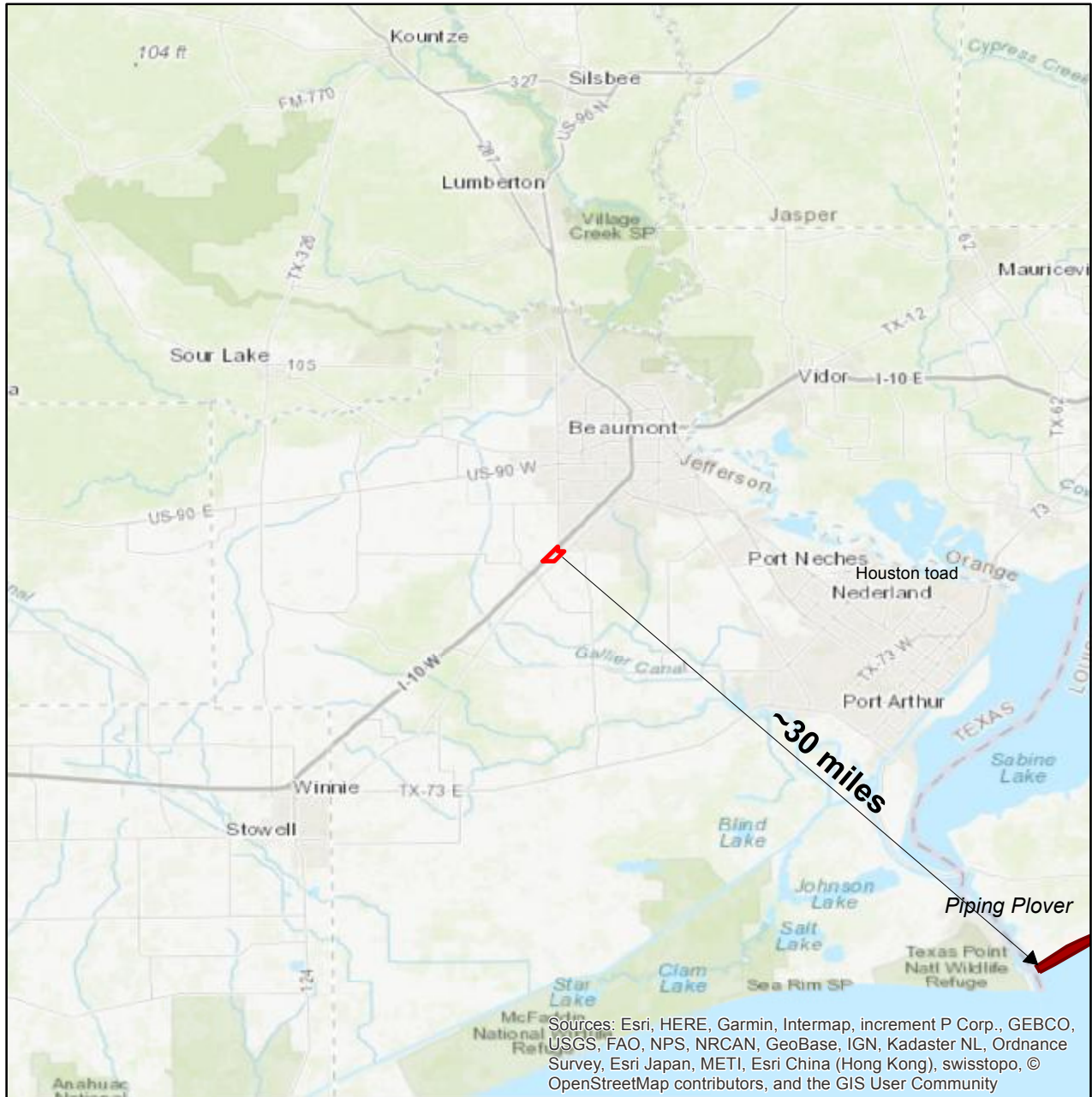
**Reliability:** Reliability unknown or not available

**Collection Remarks:** Analytical results from M-146

Parameter Code	Parameter Description	Flag	Value*	Units	Plus/Minus
00415	ALKALINITY, PHENOLPHTHALEIN (MG/L)		0	mg/L	
00410	ALKALINITY, TOTAL (MG/L AS CaCO3)		309.75	mg/L	
00440	BICARBONATE ION, CALCULATED (MG/L AS HCO3)		378	mg/L	
00910	CALCIUM (MG/L)		148	mg/L	
00445	CARBONATE ION, CALCULATED (MG/L AS CO3)		0	mg/L	
00940	CHLORIDE, TOTAL (MG/L AS CL)		225	mg/L	
00900	HARDNESS, TOTAL, CALCULATED (MG/L AS CaCO3)		435	mg/L	
00920	MAGNESIUM (MG/L)		16	mg/L	
71860	RESIDUAL SODIUM CARBONATE, CALCULATED		0		
00931	SODIUM ADSORPTION RATIO, CALCULATED (SAR)		2.27		
00932	SODIUM, CALCULATED, PERCENT		35	PCT	
00929	SODIUM, TOTAL (MG/L AS NA)	calculated	109	mg/L	
00945	SULFATE, TOTAL (MG/L AS SO4)		43	mg/L	
70301	TOTAL DISSOLVED SOLIDS , SUM OF CONSTITUENTS (MG/L)		726	mg/L	

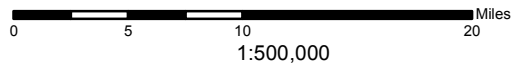
\* Value may not display all significant digits for parameter in results, check Scanned Documents for laboratory paperwork..

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Source: USF&W ECOS Environmental Conservation Online System, ESRI

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## U.S. FWS Threatened & Endangered Species Active Critical Habitats

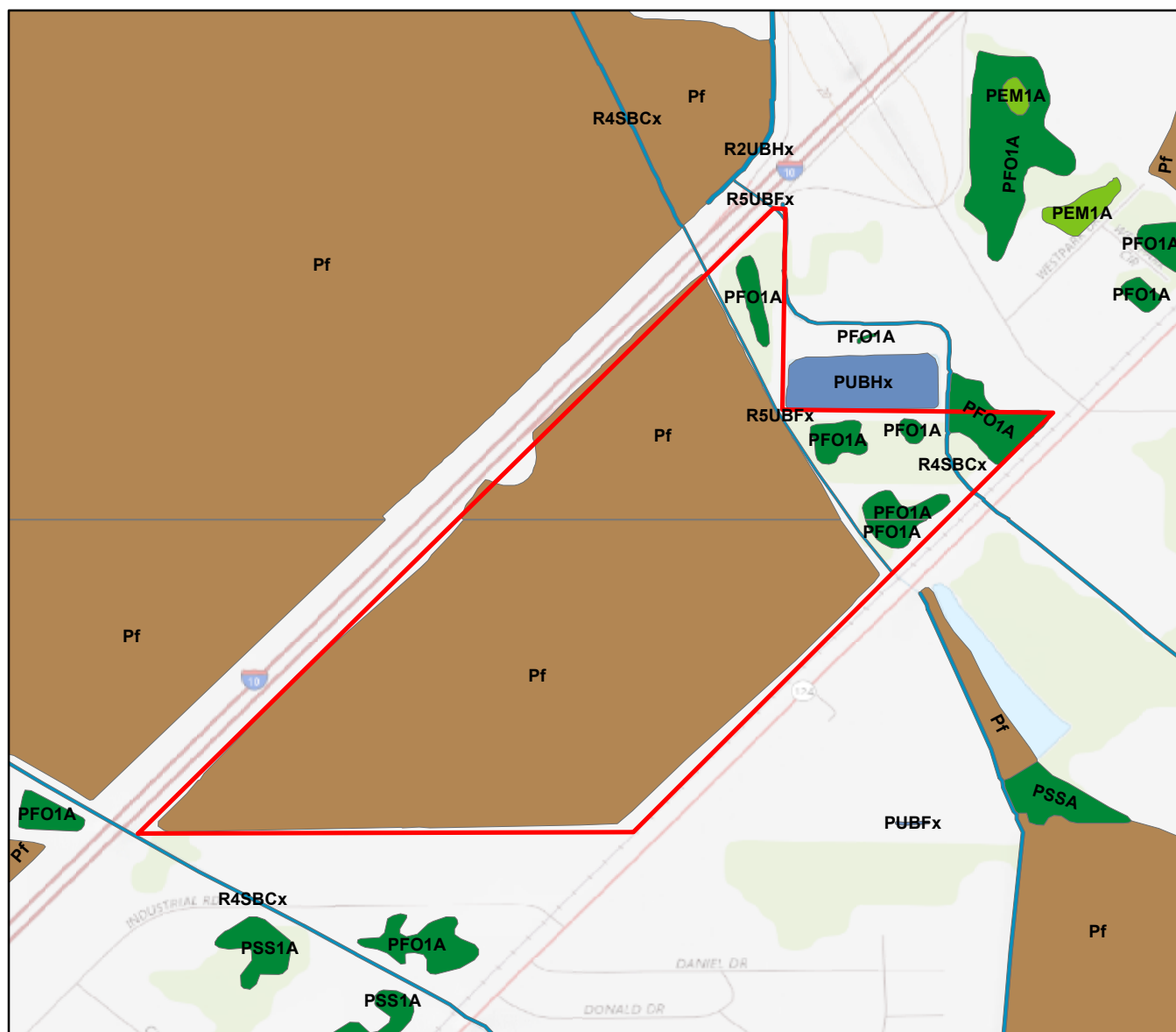
Critical habitat is a term defined and used in the Act. It is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. An area is designated as "critical habitat"

An area designated as critical habitat is not a refuge or sanctuary for the species. Listed species and their habitat are protected by the Act whether or not they are in an area designated as critical habitat.

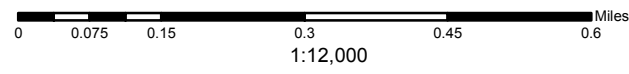
- Critical Habitat - Final - Linear Features
- Critical Habitat - Proposed - Linear Features
- Critical Habitat - Final - Polygonal Features
- Critical Habitat - Proposed - Polygonal Features



**PEI Project No: 201806054**



Source: USF&S, USGS NHL, ESRI











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## US F&WS National Wetlands Inventory and Riparian Habitats

The U.S. Fish and Wildlife Service is the principal Federal agency that provides information to the public on the extent and status of the Nation's wetlands. These data delineate the areal extent of wetlands and surface waters as defined by Cowardin et al. (1979). Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation, some deepwater reef communities (coral or tubercid worm reefs), and certain types of "farmed wetlands". Riparian areas are lands that occur along watercourses and water bodies. Typical examples include flood plains and streambanks. They are distinctly different from surrounding lands because of unique soil and vegetation characteristics that are strongly influenced by the presence of water.

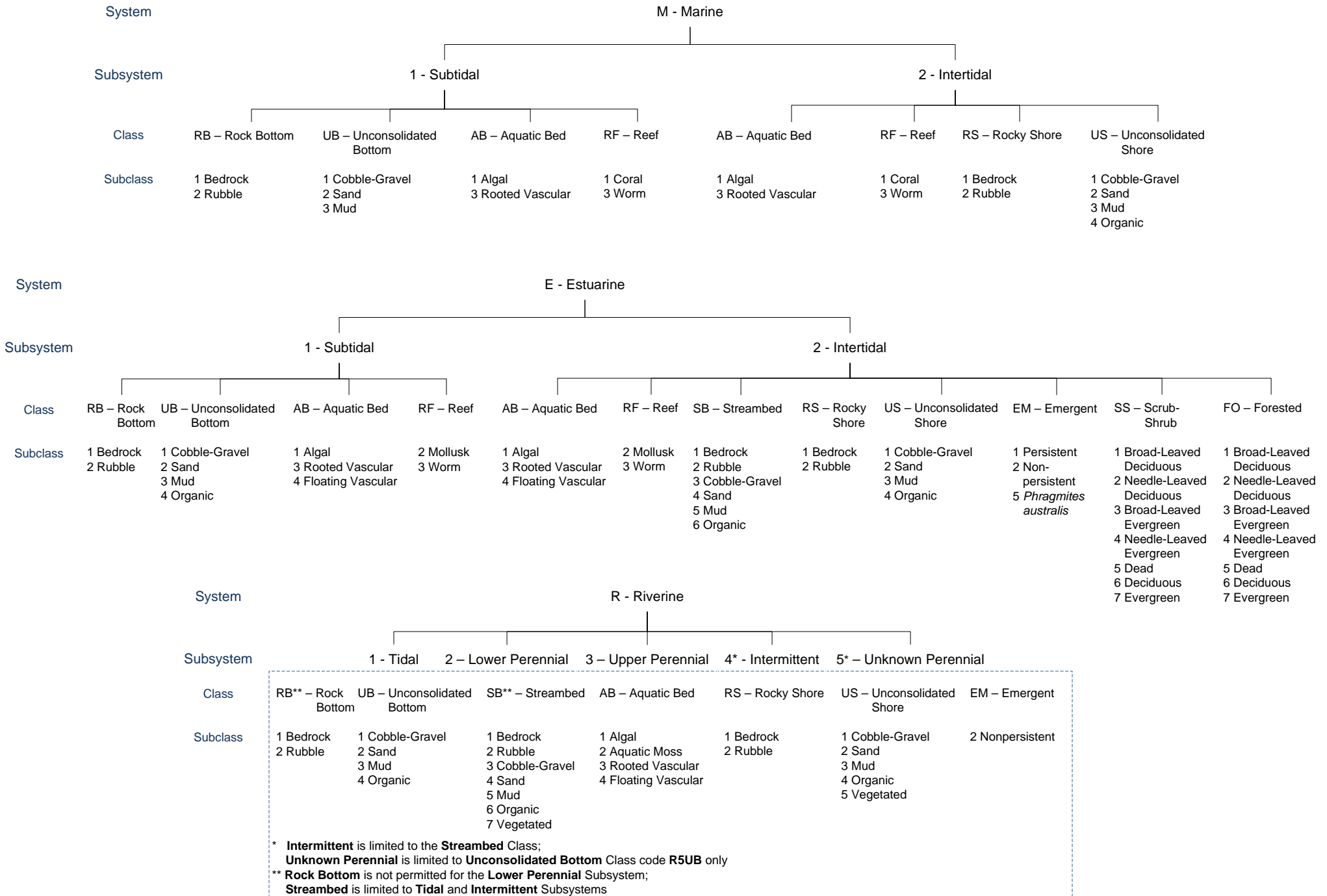
### Wetland and Deepwater Habitats

- |   |  |
|---|--|
|  Freshwater Forested/Shrub Wetland |  Riverine                       |
|  Freshwater Emergent Wetland       |  Lake                           |
|  Freshwater Pond                   |  Estuarine and Marine Deepwater |
|  Estuarine and Marine Wetland      |  Other Freshwater Wetland       |

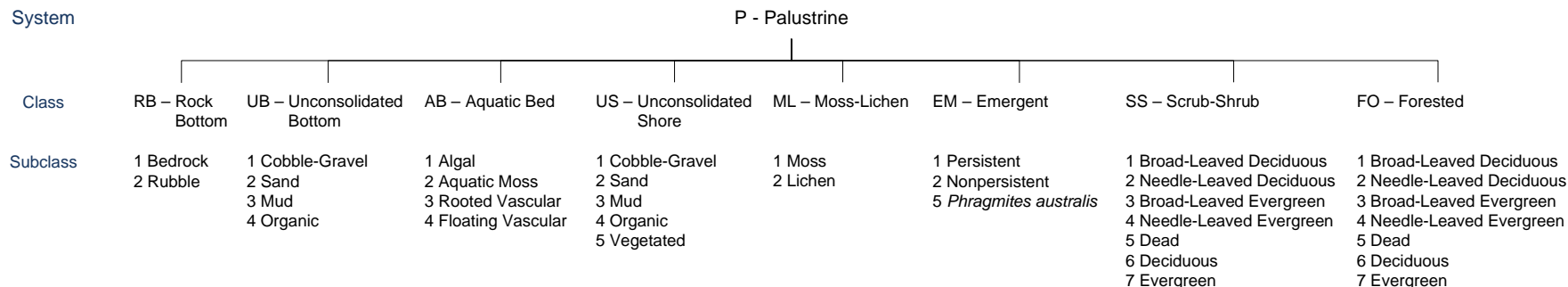
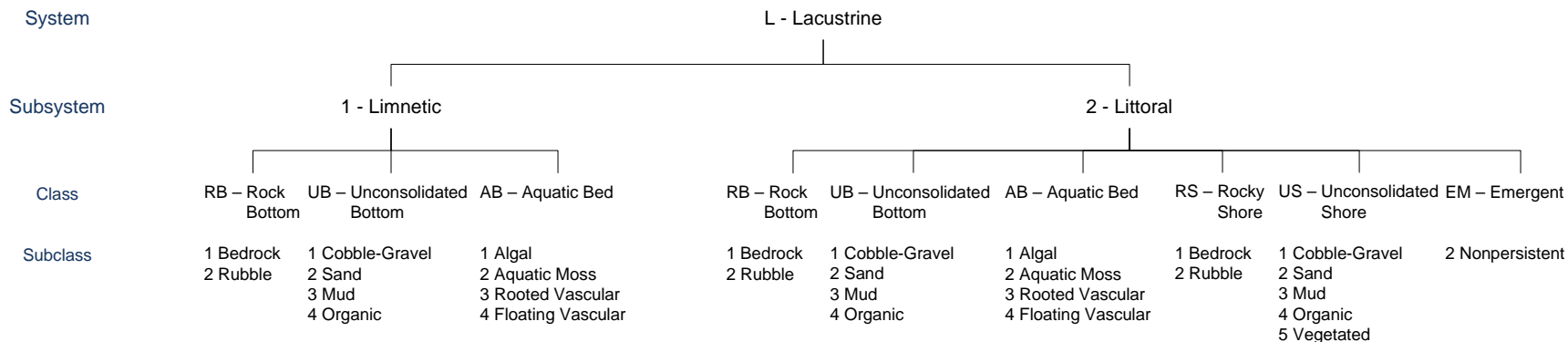
### Riparian Habitats

- |   |
|---|
|  Forested/Shrub Riparian |
|  Herbaceous Riparian     |
|  Other                   |

# WETLANDS AND DEEPWATER HABITATS CLASSIFICATION



# WETLANDS AND DEEPWATER HABITATS CLASSIFICATION



MODIFIERS							
In order to more adequately describe the wetland and deepwater habitats, one or more of the water regime, water chemistry, soil, or special modifiers may be applied at the class or lower level in the hierarchy. The farmed modifier may also be applied to the ecological system.							
Water Regime			Special Modifiers	Water Chemistry			Soil
Nontidal	Saltwater Tidal	Freshwater Tidal		Coastal Halinity	Inland Salinity	pH Modifiers for all Fresh Water	
A Temporarily Flooded	L Subtidal	S Temporarily Flooded-Tidal	b Beaver	1 Hyperhaline	7 Hypersaline	a Acid	g Organic
B Saturated	M Irregularly Exposed	R Seasonally Flooded-Tidal	d Partly Drained/Ditched	2 Euhaline	8 Eusaline	t Circumneutral	n Mineral
C Seasonally Flooded	N Regularly Flooded	T Semipermanently Flooded-Tidal	f Farmed	3 Mixohaline (Brackish)	9 Mixosaline	i Alkaline	
E Seasonally Flooded/ Saturated	P Irregularly Flooded	V Permanently Flooded-Tidal	h Diked/Impounded	4 Polyhaline	0 Fresh		
F Semipermanently Flooded			r Artificial	5 Mesohaline			
G Intermittently Exposed			s Spoil	6 Oligohaline			
H Permanently Flooded			x Excavated	0 Fresh			
J Intermittently Flooded							
K Artificially Flooded							

# **APPENDIX II**

## **PHOTO GALLERY**





1. View North along Interstate Highway 10



2. View of southwest adjoining canal



3. View east along south property boundary



4. View southeast of southwest portion of subject property



5. View southeast of subject property from IH-10



6. Continued view northeast along IH-10



7. View southeast of north portion of subject property



8. View southeast along onsite overhead electrical easement from IH-10



9. Northwest adjoining undeveloped land across IH-10



10. View southwest along IH-10



11. Canal on northeast portion of subject property



12. View south along northeast property boundary



13. Northeast adjoining Western Star Freightliner



14. View of northeast adjoining pond



15. View west along northeast property boundary



16. Northeast adjoining RV park





17. View southwest along Fannett Road



18. Northeast adjoining electrical sub-station across Fannett Road



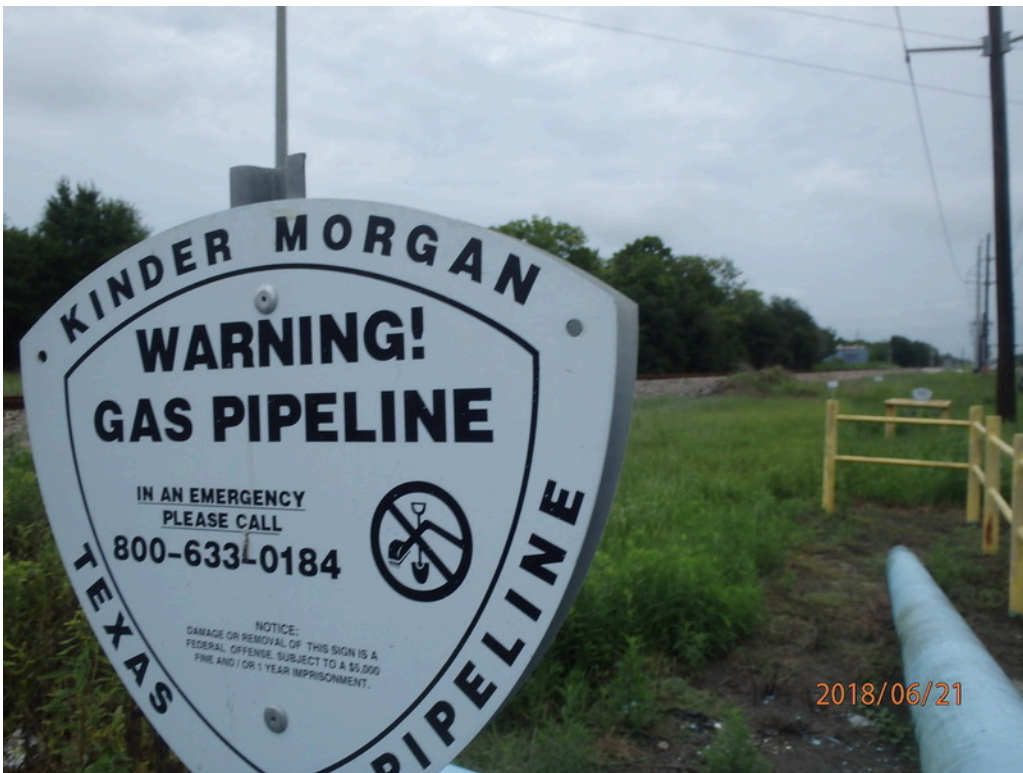
19. View west along onsite overhead electrical easement from Fannett Road



20. Railroad tracks located along southeast property boundary



21. Pipeline along southeast property boundary



22. Pipeline marker along southeast property boundary



23. Southeast adjoining single-family residence across Fannett Road



24. Southeast adjoining Wheaton's Plaza across Fannett Road



25. View of abandoned farm equipment on southeast portion of subject property



26. View west of southeast portion of subject property



27. View west along south property boundary



28. View of petroleum pipeline marker along southern boundary



29. View west of south adjoining property



30. Continued view west along southwest property boundary



31. View south of pipeline marker and railroad spur on south adjoining property



32. View east of south adjoining property





33. View of rice hull mounds on south adjoining property



34. View of AZZ Galvanizing property to the south



35. View of totes and drums on the south adjoining property



36. View northeast of southwest portion of subject property



37. View of drums and AST on the south adjoining property

**APPENDIX III**

**OWNERSHIP & PUBLIC DOCUMENTATION**

Property Search Results > 137574 WHITMEYER WESLEY B & VIRGINIA WHITMEYER BOLTON for Year 2018

Property

Account

Property ID:	137574	Legal Description:	H T & B RR-ABS 145 TR 1-2 UND 1/2 INT IN 487.2178 AC = 243.6089 AC
Geographic ID:	300145-000-000100-00000-8	Agent Code:	
Type:	Real	Parent Property ID:	386619
Property Use Code:	D1		
Property Use Description:	5+ ACRES PASTURE/RANCH		

Location

Address:	TX	Mapsco:	101-37
Neighborhood:		Map ID:	0
Neighborhood CD:			

Owner

Name:	WHITMEYER WESLEY B & VIRGINIA WHITMEYER BOLTON	Owner ID:	678976
Mailing Address:	c/o WESLEY B WHITMEYER 2614 CLEAR RIDGE KINGWOOD, TX 77339	% Ownership:	50.0000000000%
		Exemptions:	

Values

(+) Improvement Homesite Value:	+	\$0	
(+) Improvement Non-Homesite Value:	+	\$0	
(+) Land Homesite Value:	+	\$0	
(+) Land Non-Homesite Value:	+	\$0	Ag / Timber Use Value
(+) Agricultural Market Valuation:	+	\$234,610	\$42,440
(+) Timber Market Valuation:	+	\$0	\$0
-----			
(=) Market Value:	=	\$234,610	
(-) Ag or Timber Use Value Reduction:	-	\$192,170	
-----			
(=) Appraised Value:	=	\$42,440	
(-) HS Cap:	-	\$0	
-----			
(=) Assessed Value:	=	\$42,440	

Taxing Jurisdiction

Owner: WHITMEYER WESLEY B & VIRGINIA WHITMEYER BOLTON  
 % Ownership: 50.0000000000%  
 Total Value: \$234,610

Entity	Description	Tax Rate	Appraised Value	Taxable Value	Estimated Tax
101	BEAUMONT INDEPENDENT SCHOOL DISTRICT	1.294050	\$42,440	\$42,440	\$549.20
586	JEFFERSON COUNTY ESD #4	0.079867	\$42,440	\$42,440	\$33.90

755	SABINE-NECHES NAVIGATION DIST	0.091640	\$42,440	\$42,440	\$38.89
849	DRAINAGE DISTRICT #6	0.220587	\$42,440	\$42,440	\$93.62
901	JEFFERSON COUNTY	0.364977	\$42,440	\$42,440	\$154.89
A59	FARM AND LATERAL ROAD	0.000000	\$42,440	\$42,440	\$0.00
CAD	JEFFERSON CO APPRAISAL DISTRICT	0.000000	\$42,440	\$42,440	\$0.00
Total Tax Rate:		2.051121			
				Taxes w/Current Exemptions:	\$870.50
				Taxes w/o Exemptions:	\$870.50

## Improvement / Building

No improvements exist for this property.

## Land

No land segments exist for this property.

## Roll Value History

Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap	Assessed
2018	\$0	\$234,610	42,440	42,440	\$0	\$42,440
2017	\$0	\$1,067,750	406,825	406,825	\$0	\$406,825
2016	\$0	\$1,067,750	406,825	406,825	\$0	\$406,825
2015	\$0	\$234,610	79,415	79,415	\$0	\$79,415
2014	\$0	\$187,690	79,415	79,415	\$0	\$79,415
2013	\$0	\$187,690	66,240	66,240	\$0	\$66,240
2012	\$0	\$187,687	82,340	82,340	\$0	\$82,340
2011	\$0	\$166,570	79,660	79,660	\$0	\$79,660
2010	\$0	\$166,570	76,490	76,490	\$0	\$76,490
2009	\$0	\$333,140	145,680	145,680	\$0	\$145,680
2008	\$0	\$333,800	144,440	144,440	\$0	\$144,440
2007	\$0	\$268,830	132,690	132,690	\$0	\$132,690
2006	\$0	\$268,830	135,630	135,630	\$0	\$135,630
2005	\$0	\$250,630	120,070	120,070	\$0	\$120,070
2004	\$0	\$250,630	85,830	85,830	\$0	\$85,830

## Deed History - (Last 3 Deed Transactions)

#	Deed Date	Type	Description	Grantor	Grantee	Volume	Page	Deed Number
1	3/7/2018	TRD	TRUSTEE'S DEED/FORECLOSURES	EPPIE BLEWETT QUICKSALL TRUST	WHITMEYER WESLEY B & VIRGINIA WHITMEYER BOLTON			2018008695

## Tax Due

Property Tax Information as of 06/13/2018

Amount Due if Paid on: 

Year	Taxing Jurisdiction	Taxable Value	Base Tax	Base Taxes Paid	Base Tax Due	Discount / Penalty & Interest	Attorney Fees	Amount Due
------	---------------------	---------------	----------	-----------------	--------------	-------------------------------	---------------	------------

NOTE: Penalty & Interest accrues every month on the unpaid tax and is added to the balance. Attorney fees may also increase your tax liability if not paid by July 1. If you plan to submit payment on a future date, make sure you enter the date and RECALCULATE to obtain the correct total amount due.

Questions Please Call (409) 840-9944



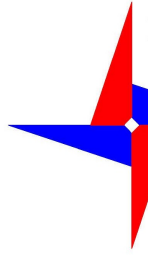
000386619

000386619

IH 10

Major Dr

HWY 124 (Fannin Rd)



MARK W. WHITELEY  
AND ASSOCIATES  
INCORPORATED

CONSULTING ENGINEERS,  
SURVEYORS, AND PLANNERS  
T.B.P.L.S. FIRM NO. 10106700 ©

P. O. BOX 5492      3250 EASTEX FRWY.  
BEAUMONT, TEXAS 77726-5492      BEAUMONT, TEXAS 77703  
409-892-0421      (FAX) 409-892-1346

**APPENDIX IV**

**REGULATORY INFORMATION**



## Regulatory Database Search

**Job Number:** 201806054

**Report Date:** June 18, 2018

**Property:**

201806054

-

Beaumont, TX 77705

**Prepared For:**

Phase Engineering, Inc.

5524 Cornish St.

Houston, TX 77007

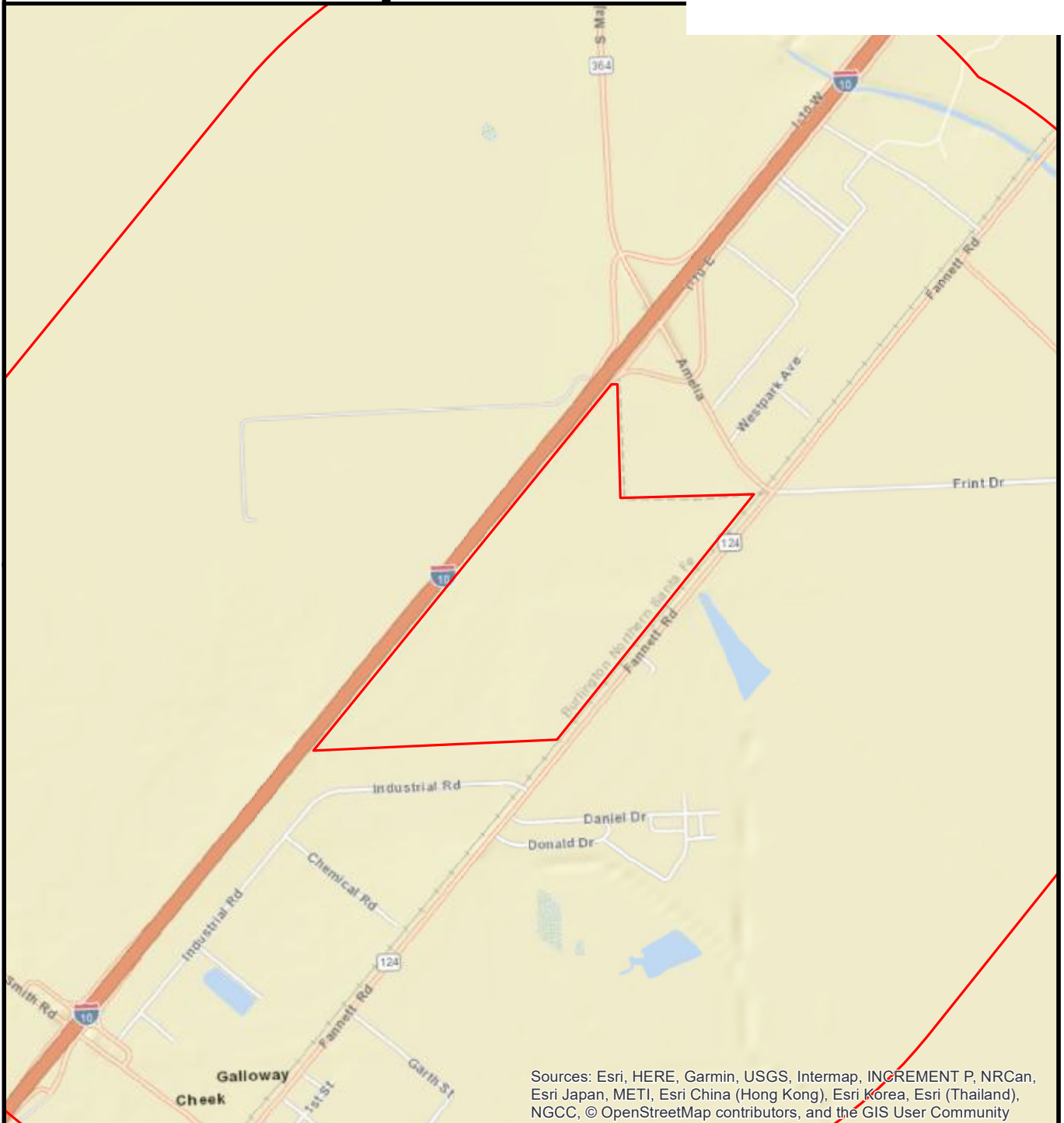
**Prepared By:**

AAI Environmental Data, Inc.

P.O. Box 70438

Houston, TX 77270

# Location Map



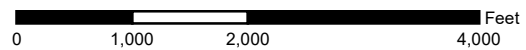
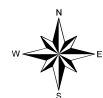
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

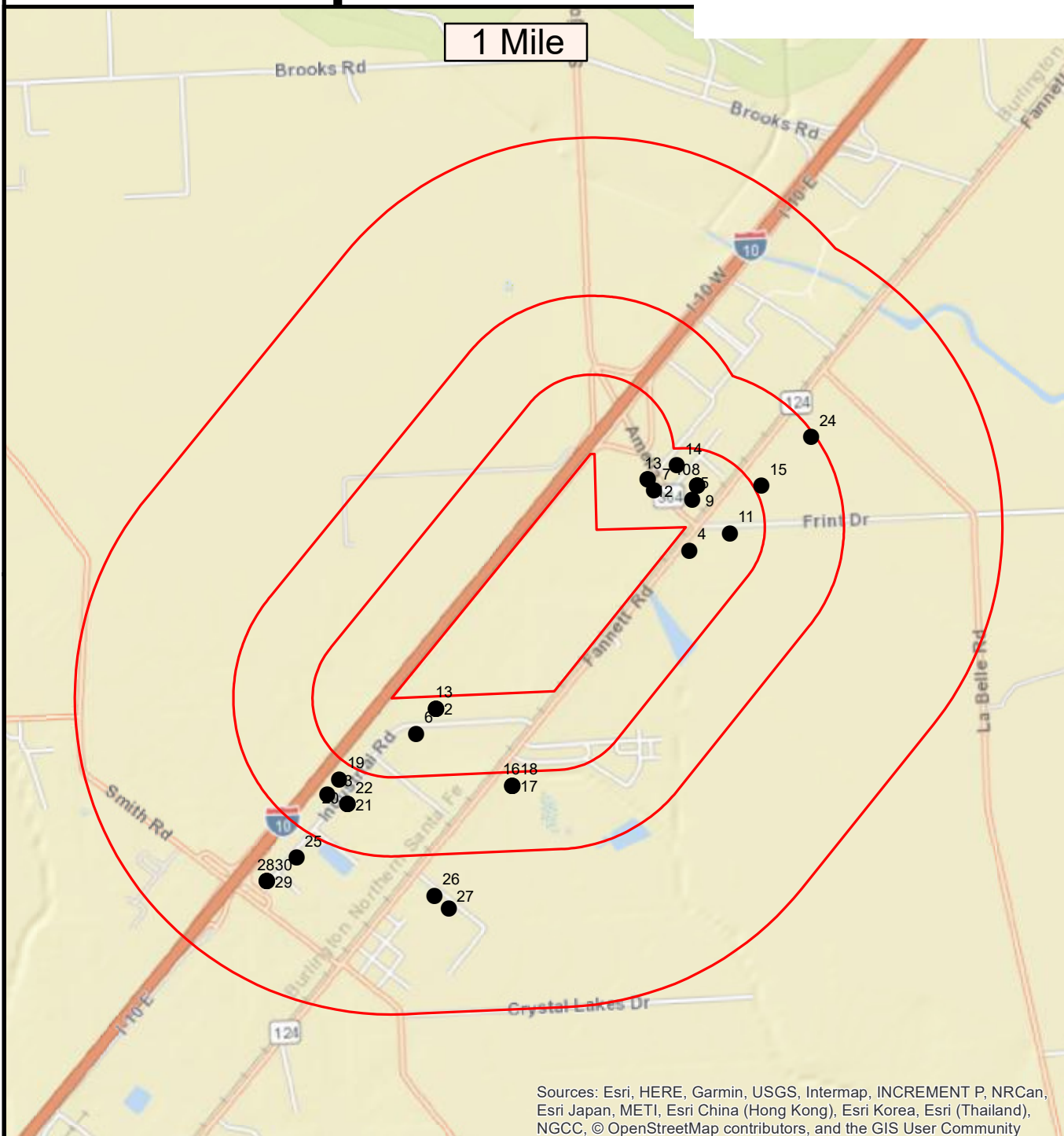
**Site** -  
**Location:** Beaumont, TX 77705  
**Job Number:** 201806054



**Scale:** 1:18,763

**Note:** Property location and boundaries are representative only.

# Hazard Map



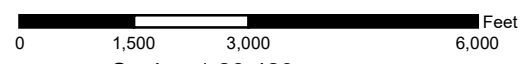
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

Site: -  
Location: Beaumont, TX 77705  
Job Number: 201806054

Copyright ©2018 AAI Environmental Data

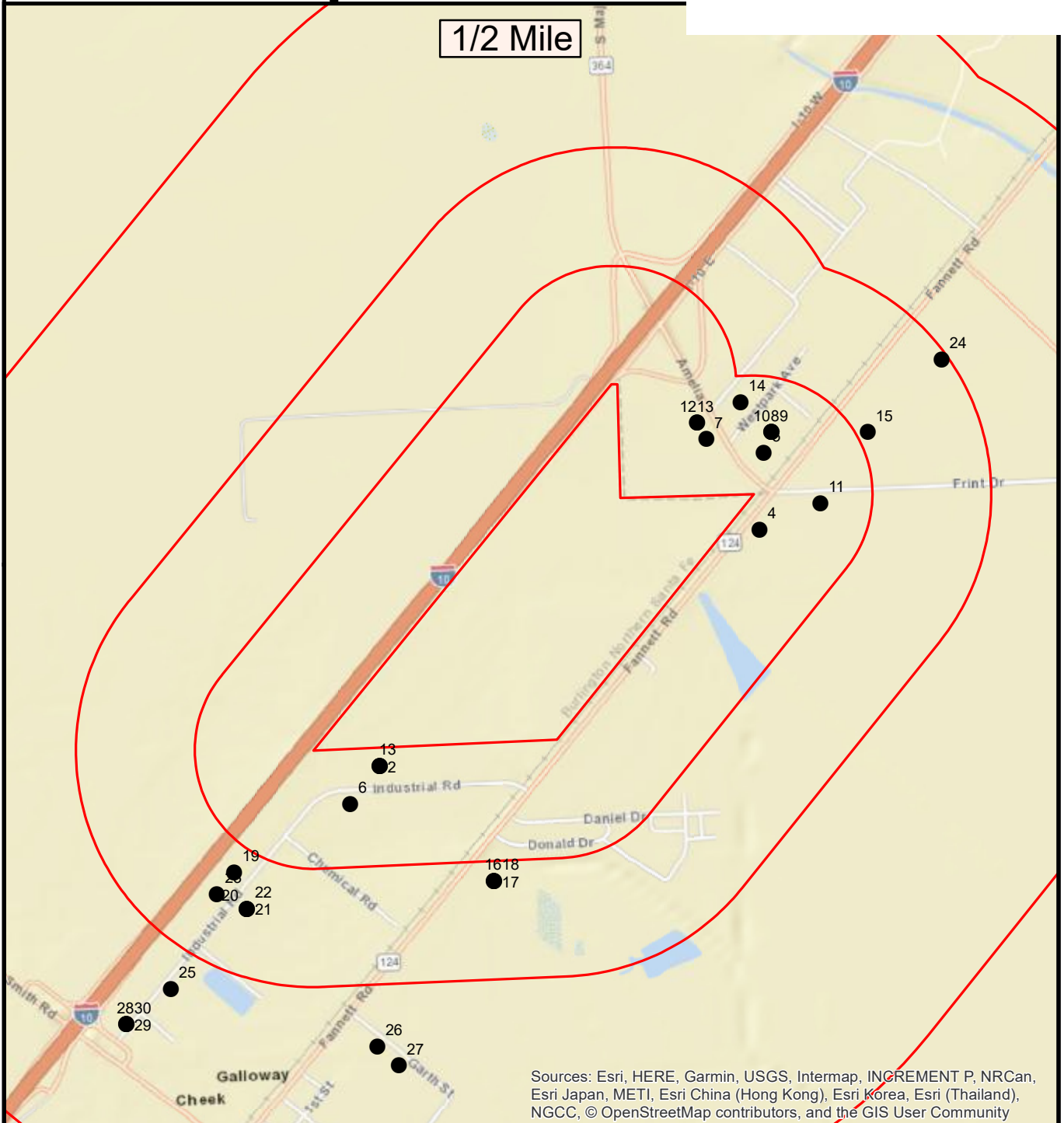


Scale: 1:28,429

Note: Property location and boundaries are representative only.

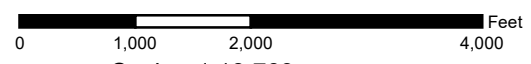
# Hazard Map

# AAI Data



Site: -  
Location: Beaumont, TX 77705  
Job Number: 201806054

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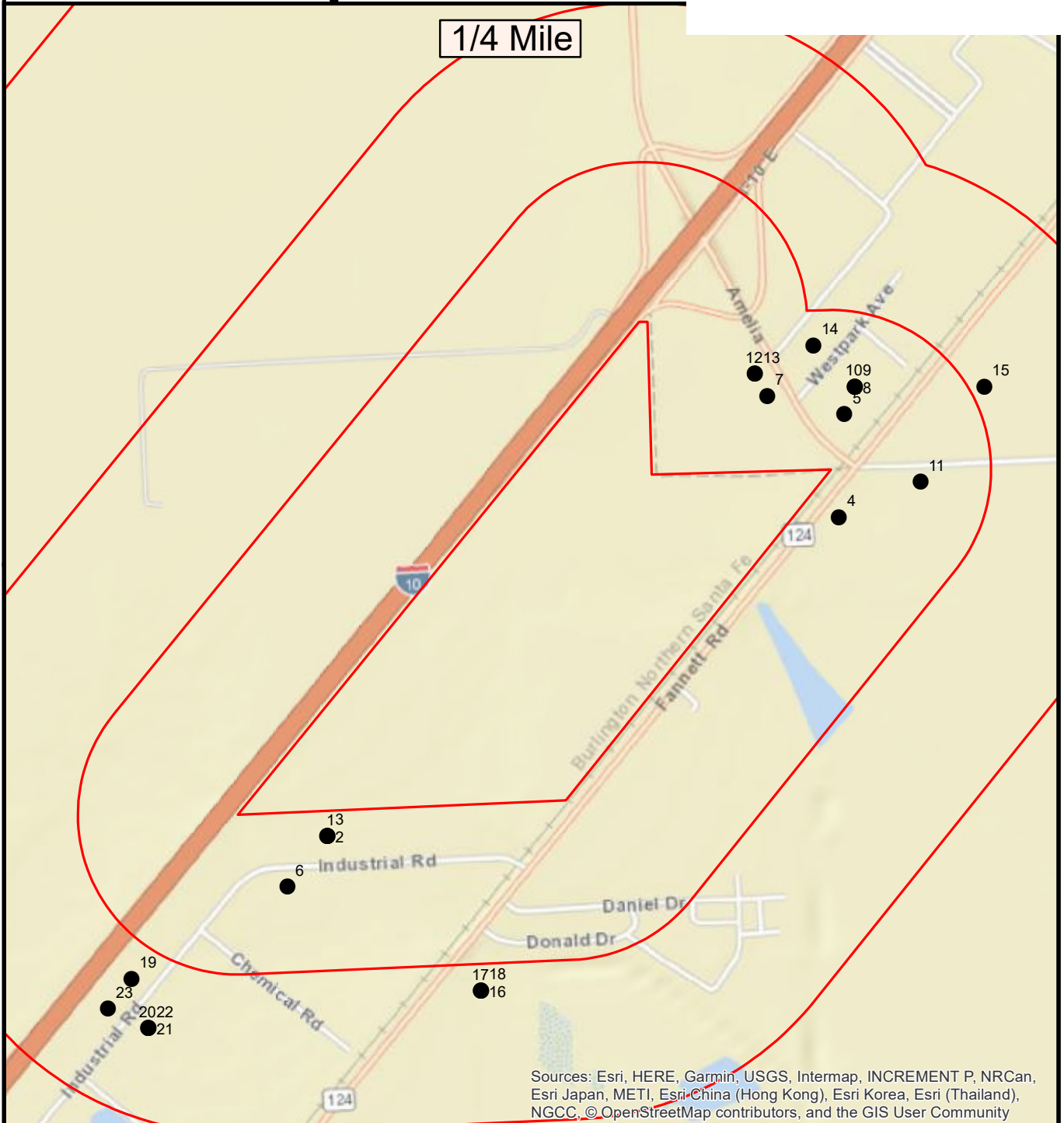


Scale: 1:18,763

Note: Property location and boundaries are representative only.


# Hazard Map

AAI Data



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**Site:** -  
**Location:** Beaumont, TX 77705  
**Job Number:** 201806054



0 750 1,500 3,000 Feet  
**Scale:** 1:13,930

**Note:** Property location and boundaries are representative only.

## Search Summary

Job Number: 201806054

Source	Environmental Record	ASTM Search Distance (miles)	Subject Property	Adjoining Property	1/2 Mile	1 Mile	Total
<b>Federal Sites</b>							
EPA	SEMS**	1.000	0	0	0	1	1
EPA	RCRA***	1.000	0	4	7	5	16
NRC	ERNS	Property	0	-	-	-	0
<b>State and Tribal Sites</b>							
TCEQ	SPL	1.000	0	0	0	0	0
TCEQ	MSW	0.500	0	0	0	-	0
TCEQ	CLI	0.500	0	0	0	-	0
TCEQ	AST	0.25	0	1	-	-	1
TCEQ	UST	0.25	0	3	-	-	3
TCEQ	LPST	0.500	0	2	2	-	4
TCEQ	RDR	0.25	0	0	0	-	0
TCEQ	IOP	0.500	0	0	0	-	0
TCEQ	VCP	0.500	0	0	0	-	0
RRC TX	RRC-VCP	0.500	0	0	0	-	0
TCEQ	BROWNFIELD	0.500	0	0	0	-	0
TCEQ	IHW	0.25	0	3	0	-	3
TCEQ	IHWCA	0.5	0	1	1	-	2
RRC TX	RRC-BRP	0.500	0	0	0	-	0
<b>Supplemental Databases</b>							
TCEQ	MSD	1.000	0	0	0	0	0
TCEQ	DCR	0.500	0	0	0	-	0
TCEQ	DCRP	0.500	0	0	0	-	0
EPA	ACRES	0.500	0	0	0	-	0

\*Adjoining properties are defined as being within a search radius of 0.25 mi. from the subject property boundaries.

\*\*SEMS includes CERCLIS, NPL, NPL delisted, NFRAP, and IC/EC

\*\*\*RCRA includes RCRA, RCRA TSD, RCRA CORRACTS, and IC/EC

# Search Summary

**Job Number:** 201806054

## Ungeocodables Summary

**Zipcode:**      **Ungeocoded Sites:**

## Site Summary

Map ID	Type	Facility ID	Facility Name	Address	Distance Direction
1	RCRA	TXD050293794	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705-6959	SW 0.039
2	IHWCA	30568	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705	SW 0.039
3	IHW	30568	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD BEAUMONT, TX 77705	SW 0.039
4	LPST	117939	FORMER SERVICE STATION	FANNETT RD BEAUMONT, TX	E 0.056
5	IHW	61536	PRECISION TUNE TRAINING CENTER	7055 S MAJOR DR BEAUMONT, TX 77705	NE 0.089
6	RCRA	TXD980873491	BAXTER OIL SVC	6029 INDUSTRIAL ROAD BEAUMONT, TX 77705	SW 0.116
7	RCRA	TXR000006320	SOUTH TEXAS EQUIPMENT	6808 S MAJOR DR BEAUMONT, TX 77705	NE 0.119
8	LPST	101602	RYDER TRUCK RENTAL	7425 WESPARK CIR BEAUMONT, TX	NE 0.135
9	AST	11898	RYDER 0880	7425 WESPARK CIR BEAUMONT, TX 77705	NE 0.135
10	UST	11898	RYDER 0880	7425 WESPARK CIR BEAUMONT, TX 77705	NE 0.135
11	RCRA	TXR000079094	STEEL PAINTERS	7453 FRINT DR BEAUMONT, TX 77720-7331	E 0.141
12	IHW	96621	EXXONMOBIL PIPELINE COMPANY- BEAUMONT OFFICE	6810 S MAJOR DR BEAUMONT, TX 77705	NE 0.154
13	UST	49019	BAKER OIL TOOLS	6810 S MAJOR DR BEAUMONT, TX 77705	NE 0.154
14	UST	1668	CSW DRYWALL SUPPLY	7420 WESPARK CIR BEAUMONT, TX 77705	NE 0.195
15	RCRA	TXT490012416	NATIONAL VACUUM TRUCKS INC	7315B FANNETT ROAD BEAUMONT, TX 77705	NE 0.273
16	RCRA	TXD061278545	BASIC ENERGY SERVICES	9045 HIGHWAY 124 BEAUMONT, TX 77705-6948	S 0.292
17	RCRA	TXD982561417	PWI BEAUMONT	9045 HIGHWAY 124 BEAUMONT, TX 77705-6948	S 0.292
18	LPST	102432	PWI	9045 HIGHWAY 124 BEAUMONT, TX	S 0.292
19	RCRA	TXR000061358	SELECT ENVIRONMENTAL	6454 INDUSTRIAL RD BEAUMONT, TX 77705-6967	SW 0.306
20	RCRA	TXD988055661	MABRY FOUNDRY INC OF BEAUMONT	6531 INDUSTRIAL RD BEAUMONT, TX 77705	SW 0.362
21	IHWCA	38042	MABRY CASTINGS	6531 INDUSTRIAL RD BEAUMONT, TX 77705	SW 0.362
22	LPST	92801	MABRY FOUNDRY	6531 INDUSTRIAL RD BEAUMONT, TX	SW 0.362



## Site Summary

Map ID	Type	Facility ID	Facility Name	Address	Distance Direction
23	RCRA	TXR000028050	COASTAL CHEMICAL	6534 INDUSTRIAL RD BEAUMONT, TX 77705-6969	SW 0.365
24	RCRA	TX0000067710	MAXIM CRANE RENTAL	7085 FANNETT RD BEAUMONT, TX 77720	NE 0.487
25	RCRA	TXD008068298	GULF COAST MACHINE & SUPPLY COMPANY	6817 INDUSTRIAL ROAD BEAUMONT, TX 77705	SW 0.586
26	RCRA	TXR000083909	HMFR BEAUMONT PLANT	7130 GARTH ST BEAUMONT, TX 77705-6882	SW 0.63
27	RCRA	TXD982287773	METALFORMS	7218 GARTH ST BEAUMONT, TX 77705-6884	S 0.672
28	SEMS	TXD050293794	INTERNATIONAL GALVANIZERS INC	500 INDUSTRY RD BEAUMONT, TX 77702	SW 0.7
29	RCRA	TXD982287492	FUTURE FOAM INC	685 INDUSTRIAL RD BEAUMONT, TX 77705	SW 0.7
30	RCRA	TXD988080222	WEATHERFORD-PETCO INC	INDUSTRIAL ROAD 10 MI S OF BEA BEAUMONT, TX 77705	SW 0.7

<b>MAP ID</b> <b>1</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705-6959

**FACILITY INFORMATION**

**EPA ID Number:** TXD050293794  
**Current Site Name:** INTERNATIONAL GALVANIZERS  
**NAICS Code:** 332812  
**NAICS Description:** Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to  
**Hazardous Report Universe Record:** Large Quantity Generator Universe  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Large Quantity Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:
4	HQ120	WRITTEN INFORMAL	State	05/25/2017
2	HQ120	WRITTEN INFORMAL	State	05/31/2006
1	HQ120	WRITTEN INFORMAL	State	04/01/2005
3	HQ120	WRITTEN INFORMAL	State	08/31/2010

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
8	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	03/23/2017	Y
6	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	06/22/2010	Y
3	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	05/09/2006	Y
1	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	02/01/2005	Y
9	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	08/07/2017	N
7	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	06/27/2011	N
5	FCI	FOCUSED COMPLIANCE INSPECTION	State/Territory	07/05/2007	N
4	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	11/14/2006	N
2	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	05/27/2005	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:
265.B	Interim Status Standards for Owners and Operators of HW TSDs: General Fac Stds	State	
270.A	EPA Administered Permit Programs: the HW Permit Program General Information	State	
265.D	Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan a	State	
265.D	Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan a	State	
265.D	Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan a	State	

<b>MAP ID</b> <b>1</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705-6959

Type:	Description:	Agency:	Scheduled Compliance Date:
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
265.J	Interim Status Standards for Owners and Operators of HW TSDs: Tank Systems	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
264.B	Standards for Owners and Operators of HW TSDs: General Facility Standards	State	
264.B	Standards for Owners and Operators of HW TSDs: General Facility Standards	State	
262.A	Standards Applicable to Generators of HW: General	State	
268.A	Land Disposal Restrictions: General	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
264.B	Standards for Owners and Operators of HW TSDs: General Facility Standards	State	
265.B	Interim Status Standards for Owners and Operators of HW TSDs: General Fac Stds	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
268.E	Land Disposal Restrictions: Prohibitions on Storage	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
265.D	Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan a	State	

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>2</b>	<b>HAZARD TYPE:</b> IHWCA	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705

**IHW Corrective Action**

**Program ID:** 30568  
**RN Name:** INTERNATIONAL GALVANIZERS  
**RN Number:** RN100634120  
**Status:** INACTIVE  
**Date:** 12/31/2001  
**Physical Status Code:** COMPLETED WORKLOAD

<b>MAP ID</b> <b>3</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705

**FACILITY INFORMATION:**

**Solid Waste Registration Number:** 30568  
**Facility Site Name:** INTERNATIONAL GALVANIZERS  
**Initial Notification Date:** 19760518  
**Last Amendment Date:** 20170804  
**EPA ID Number for Facility:** TXD050293794  
**TCEQ Hazardous Waste Permit Number:**  
**Industrial Waste Permit Number:** None Reported  
**Description of Facility/Site Location:** 5898 Industrial Rd, Beaumont, TX  
**Site Land Type:** PRIVATE

**Site Classification:**

**Generator of Waste:** Yes  
**Receiver of Waste:** No  
**Transporter of Waste:** No  
**Transfer Facility:** No  
**Maquiladora (Mexican facility):** No

**Registration Status:** ACTIVE  
**Registration Type:** Large Quantity Generator  
**Generator Type:** INDUS  
**Receiver Type:**  
**Transporter For Hire:** No  
**Transport Own Waste:** No

**INDUSTRY TYPE CODES:**

**North American Industry Classification System (NAICS) Code:** 332812 Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers  
**Standard Industrialization Code:**

**WASTE MANAGEMENT UNITS**

Sequence Number:	Description:	Unit Type:	Status:
001	395'X 317'X 235'X 36"	Surface Impoundment	CLOSED
001	Wastewater storage	Surface Impoundment	CLOSED
001	Accumulation Storage Area for Containers	Surface Impoundment	CLOSED
001	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Surface Impoundment	CLOSED
001	Spent Acid Storage Tank	Surface Impoundment	CLOSED
001	Dumpster used for plant trash.	Surface Impoundment	CLOSED
001	125'X 252'X 265'X 12"	Surface Impoundment	CLOSED
002	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Surface Impoundment	CLOSED
002	Spent Acid Storage Tank	Surface Impoundment	CLOSED
002	Accumulation Storage Area for Containers	Surface Impoundment	CLOSED
002	Wastewater storage	Surface Impoundment	CLOSED
002	395'X 317'X 235'X 36"	Surface Impoundment	CLOSED
002	125'X 252'X 265'X 12"	Surface Impoundment	CLOSED

<b>MAP ID</b> <b>3</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705

Sequence Number:	Description:	Unit Type:	Status:
002	Dumpster used for plant trash.	Surface Impoundment	CLOSED
003	125'X 252'X 265'X 12"	Sump	CLOSURE PENDING
003	395'X 317'X 235'X 36"	Sump	CLOSURE PENDING
003	Wastewater storage	Sump	CLOSURE PENDING
003	Accumulation Storage Area for Containers	Sump	CLOSURE PENDING
003	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Sump	CLOSURE PENDING
003	Spent Acid Storage Tank	Sump	CLOSURE PENDING
003	Dumpster used for plant trash.	Sump	CLOSURE PENDING
004	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Container Storage Area	ACTIVE
004	125'X 252'X 265'X 12"	Container Storage Area	ACTIVE
004	395'X 317'X 235'X 36"	Container Storage Area	ACTIVE
004	Spent Acid Storage Tank	Container Storage Area	ACTIVE
004	Dumpster used for plant trash.	Container Storage Area	ACTIVE
004	Accumulation Storage Area for Containers	Container Storage Area	ACTIVE
004	Wastewater storage	Container Storage Area	ACTIVE
005	125'X 252'X 265'X 12"	Miscellaneous Storage Containers	ACTIVE
005	395'X 317'X 235'X 36"	Miscellaneous Storage Containers	ACTIVE
005	Wastewater storage	Miscellaneous Storage Containers	ACTIVE
005	Accumulation Storage Area for Containers	Miscellaneous Storage Containers	ACTIVE
005	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Miscellaneous Storage Containers	ACTIVE
005	Spent Acid Storage Tank	Miscellaneous Storage Containers	ACTIVE
005	Dumpster used for plant trash.	Miscellaneous Storage Containers	ACTIVE
006	125'X 252'X 265'X 12"	Tank	ACTIVE
006	Dumpster used for plant trash.	Tank	ACTIVE
006	Spent Acid Storage Tank	Tank	ACTIVE

<b>MAP ID</b> <b>3</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705

Sequence Number:	Description:	Unit Type:	Status:
006	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Tank	ACTIVE
006	Accumulation Storage Area for Containers	Tank	ACTIVE
006	395'X 317'X 235'X 36"	Tank	ACTIVE
006	Wastewater storage	Tank	ACTIVE
007	Dumpster used for plant trash.	Miscellaneous Storage Containers	ACTIVE
007	125'X 252'X 265'X 12"	Miscellaneous Storage Containers	ACTIVE
007	395'X 317'X 235'X 36"	Miscellaneous Storage Containers	ACTIVE
007	Wastewater storage	Miscellaneous Storage Containers	ACTIVE
007	Accumulation Storage Area for Containers	Miscellaneous Storage Containers	ACTIVE
007	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Miscellaneous Storage Containers	ACTIVE
007	Spent Acid Storage Tank	Miscellaneous Storage Containers	ACTIVE

**WASTE INFORMATION:**

Waste ID:	New Texas Waste Code:	Waste Code Classification:	Waste Code Status:	Radio-active?	Waste Treated Offsite?	Generator Description:
71547	00013051	1	INACTIVE	No	No	Stabilized solids from hot dip galvanizing, pickling tank bottoms chemically tre
97687	00022061	1	INACTIVE	No	No	Waste oil generated during equipment and motor oil changes Waste inactivated du
114261	0003104H	H	INACTIVE	No	No	Spent hydrochloric acid from steel pickle operations Waste inactivated dueto pr
114262	00041091	1	INACTIVE	No	No	Spent sodium hydroxide from cleaning operations; A new hazardous waste determina
114263	00053041	1	INACTIVE	No	No	Molten zinc kettle surface skimmings - zinc oxide, sold for recovery; Material h
114264	00063191	1	INACTIVE	No	No	Molten zinc kettle bottoms removal - dross, sold for recovery; Initial waste cod
114265	0007104H	H	INACTIVE	No	No	Spent metal treatment solution - no longer generated Waste inactivated dueto pr
114266	0008104H	H	ACTIVE	No	No	Spent sulfuric acid from steel pickle operations
114267	00093101	1	INACTIVE	No	No	Spent waste oil filters from motor oil changed Waste inactivated due to rule ch
163268	0011319H	H	INACTIVE	No	No	Hydrochloric acid process tank bottoms clean out. Waste inactivated due toprdu
163269	0012319H	H	ACTIVE	No	No	Sulfuric acid process tank bottoms clean out.
163270	0013319H	H	ACTIVE	No	No	Sodium hydroxide process tank bottoms clean out.
163271	0014319H	H	INACTIVE	No	No	Hydrochloric acid and sulfuric acid process underground sump bottoms clean out.
199036	00103192	2	ACTIVE	No	No	Cake from Preflux Filter Press. Preflux tank solution of zinc ammonium chloride
203634	00153022	2	INACTIVE	No	No	Sludges from galvanizing process are stabilized to neutralize acid and causticsa
245605	00169992	2	ACTIVE	No	No	Plant trash from office, break room and plant. Includes paper waste, food waste,

<b>MAP ID</b> <b>3</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 5898 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.039 SW	BEAUMONT TX 77705

<b>Waste ID:</b>	<b>New Texas Waste Code:</b>	<b>Waste Code Class-ification:</b>	<b>Waste Code Status:</b>	<b>Radio-active?</b>	<b>Waste Treated Offsite?</b>	<b>Generator Description:</b>
245606	00173192	2	INACTIVE	No	No	Cake from plate and frame filter press used to filter preflux solution of zinc a
247116	00183191	1	ACTIVE	No	No	Galvanizing process tanks are skimmed to remove floating debris. The skims are p
254814	00193192	2	ACTIVE	No	No	Dust collected from bag house used to control air emissions from galvanizing ket
254815	00203192	2	ACTIVE	No	No	Mixed Sludges from galvanizing processes after stabilization and dewatering.
255824	00213102	2	INACTIVE	No	No	Used filters from baghouse that controls particulate emissions from galvanizingk
348661	00223192	2	ACTIVE	No	No	Tank bottoms from periodic clean out of Preflux tank on galvanizing process.
348764	00233192	2	ACTIVE	No	No	Tank Bottoms from periodic cleanout of quench tank on galvanizing process. Sludg
358610	00243161	1	ACTIVE	No	No	Sulfuric Acid is chilled to precipitate iron and zinc sulfate crystals. Crystals
364742	00253162	2	ACTIVE	No	No	Acid from the pickling process is chilled to precipitate iron/zinc sulfate cryst
373602	00263102	2	ACTIVE	No	No	The acid recovery unit (ARU) uses filters to filter the acid and crystals. Once t
382689	00273102	2	ACTIVE	No	No	Used filters from baghouse that controls particulate emissions from galvanizing
382690	00273102	2	INACTIVE	No	No	Used filters from baghouse that controls particulate emissions from galvanizing
384288	00283101	1	ACTIVE	No	No	Used filters from baghouse that controls particulate emissions from galvanizing
384290	00293102	2	ACTIVE	No	No	Used filters from baghouse that controls particulate emissions from galvanizing
384291	00303101	1	ACTIVE	No	No	The acid recovery unit (ARU) uses filters to filter the acid and crystals. Once



<b>MAP ID</b> <b>4</b>	<b>HAZARD TYPE:</b> LPST	<b>FACILITY ADDRESS:</b> FANNETT RD
	<b>DISTANCE:</b> 0.056 E	BEAUMONT, TX

**LPST INFORMATION:**

<b>LPST ID:</b>	117939	<b>Priority Code:</b>	4.2 - NO GW IMPACT NO APPARENT THREATS OR IMPACTS TO RECEPTORS
<b>Reported:</b>	7/16/2008	<b>Status Code:</b>	6A - FINAL CONCURRENCE ISSUED
<b>Date Entered:</b>	1/5/2009		
<b>Closure Date:</b>	9/16/2009		
<b>Facility Name:</b>	FORMER SERVICE STATION		
<b>TCEQ Region:</b>	10	<b>Program Area:</b>	1P - PRIVATIZATION CONTRACTOR

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<b>MAP ID</b> <b>5</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 7055 S MAJOR DR
	<b>DISTANCE:</b> 0.089 NE	BEAUMONT TX 77705

**FACILITY INFORMATION:**

**Solid Waste Registration Number:** 61536  
**Facility Site Name:** PRECISION TUNE TRAINING CENTER  
**Initial Notification Date:** 19850930  
**Last Amendment Date:** 20010727  
**EPA ID Number for Facility:**  
**TCEQ Hazardous Waste Permit Number:**  
**Industrial Waste Permit Number:** None Reported  
**Description of Facility/Site Location:** 7055 S Major Dr, Beaumont, TX  
**Site Land Type:**

**Site Classification:**

**Generator of Waste:** Yes  
**Receiver of Waste:** No  
**Transporter of Waste:** No  
**Transfer Facility:** No  
**Maquiladora (Mexican facility):** No

**Registration Status:** INACTIVE  
**Registration Type:** Conditionally Exempt Small Quantity Generator  
**Generator Type:** NON INDUS  
**Receiver Type:**  
**Transporter For Hire:** No  
**Transport Own Waste:** No

**INDUSTRY TYPE CODES:**

**North American Industry Classification System (NAICS) Code:**  
**Standard Industrialization Code:**

**WASTE MANAGEMENT UNITS**

Sequence Number:	Description:	Unit Type:	Status:
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**WASTE INFORMATION:**

Waste ID:	New Texas Waste Code:	Waste Code Class-ification:	Waste Code Status:	Radio-active?	Waste Treated Offsite?	Generator Description:
				No	No	Not Reported

<b>MAP ID</b> <b>6</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6029 INDUSTRIAL ROAD
	<b>DISTANCE:</b> 0.116 SW	BEAUMONT TX 77705

**FACILITY INFORMATION**

EPA ID Number: TXD980873491  
 Current Site Name: BAXTER OIL SVC  
 NAICS Code:  
 NAICS Description:  
 Hazardous Report Universe Record: Other  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Not a Generator  
 Transporter: N  
 Active Site Universe: Handler  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>7</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6808 S MAJOR DR
	<b>DISTANCE:</b> 0.119 NE	BEAUMONT TX 77705

**FACILITY INFORMATION**

EPA ID Number: TXR000006320  
 Current Site Name: SOUTH TEXAS EQUIPMENT  
 NAICS Code:  
 NAICS Description:  
 Hazardous Report Universe Record: Conditionally Exempt Small Quantity Generator Universe  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Conditionally Exempt Small Quantity Generator  
 Transporter: N  
 Active Site Universe: Handler  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>8</b>	<b>HAZARD TYPE:</b> LPST	<b>FACILITY ADDRESS:</b> 7425 WESPARK CIR
	<b>DISTANCE:</b> 0.135 NE	BEAUMONT, TX

**LPST INFORMATION:**

<b>LPST ID:</b> 101602	<b>Priority Code:</b> 5 - MINOR SOIL CONTAMINATION - DOES NOT REQUIRE A RAP
<b>Reported:</b> 1/14/1992	
<b>Date Entered:</b> 2/6/1992	<b>Status Code:</b> 6A - FINAL CONCURRENCE ISSUED
<b>Closure Date:</b> 10/20/1992	
<b>Facility Name:</b> RYDER TRUCK RENTAL	
<b>TCEQ Region:</b> 10	<b>Program Area:</b> 2 - REGION

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<b>MAP ID</b> <b>9</b>	<b>HAZARD TYPE:</b> AST	<b>FACILITY ADDRESS:</b> 7425 WESPARK CIR
	<b>DISTANCE:</b> 0.135 NE	BEAUMONT, TX 77705

**FACILITY INFORMATION:**

<b>Facility ID:</b>	11898	<b>Facility Contact:</b>	SCOTT THAMES
<b>Facility Name:</b>	RYDER 0880	<b>Facility Contact Title:</b>	
<b>Facility Type:</b>	FLEET REFUELING	<b>Facility Contact Phone:</b>	7136540674
<b>Facility Begin Date:</b>	07/30/1986		
<b>Facility Status:</b>	ACTIVE		
<b>Number of Active USTs:</b>	0	<b>Enforcement Action:</b>	
<b>Number of Active ASTs:</b>	1	<b>Enforcement Action Date:</b>	

**OWNER INFORMATION:**

<b>Owner Name:</b>	CN600257	<b>Owner ID:</b>	CN600257299
<b>Owner Type:</b>	CO	<b>Contact Phone:</b>	
<b>Contact Mailing Address:</b>	,		

**OPERATOR INFORMATION:**

<b>Operator CN:</b>		<b>Effective Date:</b>	
<b>Operator Name:</b>		<b>Operator Type:</b>	

**TANK DETAILS:**

<b>AST ID:</b>	180725	<b>Tank Installation Date:</b>	06/19/1996
<b>Tank ID:</b>	1	<b>Tank Registration Date:</b>	07/08/1996
<b>Multiple Compartment Flag:</b>	N	<b>Tank Status (current) Begin Date:</b>	06/19/1996
<b>Tank Status:</b>	IN USE	<b>Tank Capacity (in gallons):</b>	10000
<b>Tank Regulatory Status:</b>	FULLY REGULATED	<b>Substance Stored 2:</b>	
<b>Substance Stored 1:</b>	DIESEL		
<b>Substance Stored 3:</b>			

**MATERIAL OF CONSTRUCTION:**

<b>Steel:</b>	Y	<b>Fiberglass:</b>	N
<b>Aluminum:</b>	N	<b>Corrugated Metal:</b>	N
<b>Concrete:</b>	N		

**CONTAINMENT:**

<b>Earthen Dike:</b>	N	<b>Liner:</b>	N
<b>Concrete:</b>	N	<b>None:</b>	N

**Stage I Vapor Recovery:**

<b>MAP ID</b>  <b>10</b>	<b>HAZARD TYPE:</b> UST	<b>FACILITY ADDRESS:</b> 7425 WESPARK CIR
	<b>DISTANCE:</b> 0.135 NE	BEAUMONT, TX 77705

**FACILITY INFORMATION:**

<b>Facility ID:</b>	11898	<b>Facility Contact:</b>	SCOTT THAMES
<b>Facility Name:</b>	RYDER 0880	<b>Facility Contact Title:</b>	
<b>Facility Type:</b>	FLEET REFUELING	<b>Facility Contact Phone:</b>	7136540674
<b>Facility Begin Date:</b>	07/30/1986		
<b>Facility Status:</b>	ACTIVE		
<b>Number of Active USTs:</b>	0	<b>Enforcement Action:</b>	
<b>Number of Active ASTs:</b>	1	<b>Enforcement Action Date:</b>	

**OWNER INFORMATION:**

<b>Owner Name:</b>	RYDER TRUCK RENTAL INC	<b>Owner ID:</b>	CN600257299
<b>Owner Type:</b>	CO		
<b>Contact Mailing Address:</b>	,	<b>Contact Phone:</b>	

**OPERATOR INFORMATION:**

<b>Operator CN:</b>		<b>Effective Date:</b>	
<b>Operator Name:</b>		<b>Operator Type:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	31198	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	5	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	01/14/1992
<b>Tank Capacity (in gallons):</b>	2000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	5	<b>Substance Stored 1:</b>	USED OIL
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	2000	<b>Substance Stored 3:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	31199	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	4	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	01/14/1992
<b>Tank Capacity (in gallons):</b>	6000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	4	<b>Substance Stored 1:</b>	NEW OIL
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	6000	<b>Substance Stored 3:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	31200	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	1	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	07/07/1995
<b>Tank Capacity (in gallons):</b>	10000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

<b>MAP ID</b>  <b>10</b>	<b>HAZARD TYPE:</b> UST	<b>FACILITY ADDRESS:</b> 7425 WESPARK CIR
	<b>DISTANCE:</b> 0.135 NE	BEAUMONT, TX 77705

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	1	<b>Substance Stored 1:</b>	DIESEL
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	10000	<b>Substance Stored 3:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	31201	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	3	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	07/07/1995
<b>Tank Capacity (in gallons):</b>	10000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	3	<b>Substance Stored 1:</b>	GASOLINE
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	10000	<b>Substance Stored 3:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	31202	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	2	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	07/07/1995
<b>Tank Capacity (in gallons):</b>	10000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	2	<b>Substance Stored 1:</b>	DIESEL
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	10000	<b>Substance Stored 3:</b>	



<b>MAP ID</b> <b>11</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 7453 FRINT DR
	<b>DISTANCE:</b> 0.141 E	BEAUMONT TX 77720-7331

**FACILITY INFORMATION**

EPA ID Number: TXR000079094  
 Current Site Name: STEEL PAINTERS  
 NAICS Code:  
 NAICS Description:  
 Hazardous Report Universe Record: Conditionally Exempt Small Quantity Generator Universe  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Conditionally Exempt Small Quantity Generator  
 Transporter: N  
 Active Site Universe: Handler  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
1	FCI	FOCUSED COMPLIANCE INSPECTION	State/Territory	01/23/2008	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b>  <b>12</b>	<b>HAZARD TYPE:</b> IHW	<b>FACILITY ADDRESS:</b> 6810 S MAJOR DR
	<b>DISTANCE:</b> 0.154 NE	BEAUMONT TX 77705

**FACILITY INFORMATION:**

**Solid Waste Registration Number:** 96621  
**Facility Site Name:** EXXONMOBIL PIPELINE COMPANY- BEAUMONT OFFICE  
**Initial Notification Date:** 20170213  
**Last Amendment Date:** 20170213  
**EPA ID Number for Facility:** TXR000084064  
**TCEQ Hazardous Waste Permit Number:**  
**Industrial Waste Permit Number:** None Reported  
**Description of Facility/Site Location:**  
**Site Land Type:** PRIVATE

**Site Classification:**

**Generator of Waste:** Yes  
**Receiver of Waste:** No  
**Transporter of Waste:** No  
**Transfer Facility:** No  
**Maquiladora (Mexican facility):** No

**Registration Status:** ACTIVE  
**Registration Type:** Small Quantity Generator  
**Generator Type:** INDUS  
**Receiver Type:**  
**Transporter For Hire:** No  
**Transport Own Waste:** No

**INDUSTRY TYPE CODES:**

**North American Industry Classification System (NAICS) Code:** 486910 Pipeline Transportation of Refined Petroleum Products  
**Standard Industrialization Code:**

**WASTE MANAGEMENT UNITS**

Sequence Number:	Description:	Unit Type:	Status:
001	CONTAINER STORAGE AREA	Container Storage Area	ACTIVE

**WASTE INFORMATION:**

Waste ID:	New Texas Waste Code:	Waste Code Class-ification:	Waste Code Status:	Radio-active?	Waste Treated Offsite?	Generator Description:
389486	0001203H	H	ACTIVE	No	No	DE GREASER SOLUTION

<b>MAP ID</b>  <b>13</b>	<b>HAZARD TYPE:</b> UST	<b>FACILITY ADDRESS:</b> 6810 S MAJOR DR
	<b>DISTANCE:</b> 0.154 NE	BEAUMONT, TX 77705

**FACILITY INFORMATION:**

<b>Facility ID:</b>	49019	<b>Facility Contact:</b>	VICTOR CARVAR
<b>Facility Name:</b>	BAKER OIL TOOLS	<b>Facility Contact Title:</b>	OPER MGR
<b>Facility Type:</b>	FLEET REFUELING	<b>Facility Contact Phone:</b>	4098422567
<b>Facility Begin Date:</b>	09/08/1989		
<b>Facility Status:</b>	INACTIVE		
<b>Number of Active USTs:</b>	0	<b>Enforcement Action:</b>	
<b>Number of Active ASTs:</b>	0	<b>Enforcement Action Date:</b>	

**OWNER INFORMATION:**

<b>Owner Name:</b>	BAKER HUGHES OILFIELD OPER	<b>Owner ID:</b>	CN600290134
<b>Owner Type:</b>	CO		
<b>Contact Mailing Address:</b>	,	<b>Contact Phone:</b>	

**OPERATOR INFORMATION:**

<b>Operator CN:</b>		<b>Effective Date:</b>	
<b>Operator Name:</b>		<b>Operator Type:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	127395	<b>Tank Installation Date:</b>	01/01/1984
<b>Tank ID:</b>	1	<b>Tank Registration Date:</b>	09/05/1989
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	08/31/1987
<b>Tank Capacity (in gallons):</b>	3000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	1	<b>Substance Stored 1:</b>	EMPTY
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	3000	<b>Substance Stored 3:</b>	

<b>MAP ID</b>  <b>14</b>	<b>HAZARD TYPE:</b> UST	<b>FACILITY ADDRESS:</b> 7420 WESPARK CIR
	<b>DISTANCE:</b> 0.195 NE	BEAUMONT, TX 77705

**FACILITY INFORMATION:**

<b>Facility ID:</b>	1668	<b>Facility Contact:</b>	V KELINSKE
<b>Facility Name:</b>	CSW DRYWALL SUPPLY	<b>Facility Contact Title:</b>	MGR
<b>Facility Type:</b>	UNKNOWN	<b>Facility Contact Phone:</b>	4098421446
<b>Facility Begin Date:</b>	06/04/1986		
<b>Facility Status:</b>	INACTIVE		
<b>Number of Active USTs:</b>	0	<b>Enforcement Action:</b>	
<b>Number of Active ASTs:</b>	0	<b>Enforcement Action Date:</b>	

**OWNER INFORMATION:**

<b>Owner Name:</b>	CSW SUPPLY	<b>Owner ID:</b>	CN601019144
<b>Owner Type:</b>	CO		
<b>Contact Mailing Address:</b>	,	<b>Contact Phone:</b>	

**OPERATOR INFORMATION:**

<b>Operator CN:</b>		<b>Effective Date:</b>	
<b>Operator Name:</b>		<b>Operator Type:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	4158	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	2	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	07/19/1993
<b>Tank Capacity (in gallons):</b>	10000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	2	<b>Substance Stored 1:</b>	DIESEL
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	10000	<b>Substance Stored 3:</b>	

**TANK DETAILS:**

<b>UST ID:</b>	4159	<b>Tank Installation Date:</b>	01/01/1981
<b>Tank ID:</b>	1	<b>Tank Registration Date:</b>	05/08/1986
<b>Number of Compartments:</b>	1	<b>Current Status Date:</b>	07/19/1993
<b>Tank Capacity (in gallons):</b>	1000		
<b>Tank Status:</b>	REMOVED FROM GROUND		

**COMPARTMENT DETAILS:**

<b>Tank ID:</b>	1	<b>Substance Stored 1:</b>	GASOLINE
<b>Compartment ID:</b>	A	<b>Substance Stored 2:</b>	
<b>Capacity (in gallons):</b>	1000	<b>Substance Stored 3:</b>	

<b>MAP ID</b> <b>15</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 7315B FANNETT ROAD
	<b>DISTANCE:</b> 0.273 NE	BEAUMONT TX 77705

**FACILITY INFORMATION**

EPA ID Number: TXT490012416  
 Current Site Name: NATIONAL VACUUM TRUCKS INC  
 NAICS Code: 48411  
 NAICS Description: General Freight Trucking, LocalT  
 Hazardous Report Universe Record: Transporter Universe  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Not a Generator  
 Transporter: Y  
 Active Site Universe: Handler  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b>  <b>16</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 9045 HIGHWAY 124
	<b>DISTANCE:</b> 0.292 S	BEAUMONT TX 77705-6948

**FACILITY INFORMATION**

**EPA ID Number:** TXD061278545  
**Current Site Name:** BASIC ENERGY SERVICES  
**NAICS Code:** 48411  
**NAICS Description:** General Freight Trucking, LocalT  
**Hazardous Report Universe Record:** Other  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Not a Generator  
**Transporter:** N  
**Active Site Universe:**  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>17</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 9045 HIGHWAY 124
	<b>DISTANCE:</b> 0.292 S	BEAUMONT TX 77705-6948

**FACILITY INFORMATION**

EPA ID Number: TXD982561417  
 Current Site Name: PWI BEAUMONT  
 NAICS Code: 48411  
 NAICS Description: General Freight Trucking, LocalT  
 Hazardous Report Universe Record: Other  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Not a Generator  
 Transporter: N  
 Active Site Universe:  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>18</b>	<b>HAZARD TYPE:</b> LPST	<b>FACILITY ADDRESS:</b> 9045 HIGHWAY 124
	<b>DISTANCE:</b> 0.292 S	BEAUMONT, TX

**LPST INFORMATION:**

<b>LPST ID:</b> 102432	<b>Priority Code:</b> 4.1 - GW IMPACTED NO APPARENT THREATS OR IMPACTS TO RECEPTORS
<b>Reported:</b> 3/13/1992	
<b>Date Entered:</b> 4/27/1992	<b>Status Code:</b> 6P - FINAL PENDING WELL PLUG
<b>Closure Date:</b> 7/13/2006	
<b>Facility Name:</b> PWI	
<b>TCEQ Region:</b> 10	<b>Program Area:</b> 1P - PRIVATIZATION CONTRACTOR

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<b>MAP ID</b>  <b>19</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6454 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.306 SW	BEAUMONT TX 77705-6967

**FACILITY INFORMATION**

**EPA ID Number:** TXR000061358  
**Current Site Name:** SELECT ENVIRONMENTAL  
**NAICS Code:** 42472  
**NAICS Description:** Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations  
**Hazardous Report Universe Record:** Other  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Not a Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>20</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6531 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.362 SW	BEAUMONT TX 77705

**FACILITY INFORMATION**

EPA ID Number: TXD988055661  
 Current Site Name: MABRY FOUNDRY INC OF BEAUMONT  
 NAICS Code: 331511  
 NAICS Description: Iron Foundries  
 Hazardous Report Universe Record: Other  
 Full Enforcement Universe:  
 Federal Waste Generator Code: Not a Generator  
 Transporter: N  
 Active Site Universe:  
 Operating TSD (Treatment, Storage, or Disposal Unit) Universe:

**CORRECTIVE ACTION:**

Corrective Action Workload?: No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:
1	HQ120	WRITTEN INFORMAL	State	01/08/2008

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
1	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	11/12/2007	Y
2	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	01/14/2009	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>21</b>	<b>HAZARD TYPE:</b> IHWCA	<b>FACILITY ADDRESS:</b> 6531 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.362 SW	BEAUMONT TX 77705

**IHW Corrective Action**

**Program ID:** 38042  
**RN Name:** MABRY CASTINGS  
**RN Number:** RN100212802  
**Status:** ACTIVE  
**Date:** 3/13/2012  
**Physical Status Code:** ONGOING WORKLOAD

<b>MAP ID</b> <b>22</b>	<b>HAZARD TYPE:</b> LPST	<b>FACILITY ADDRESS:</b> 6531 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.362 SW	BEAUMONT, TX

**LPST INFORMATION:**

<b>LPST ID:</b> 92801	<b>Priority Code:</b> 4A - SOIL CONTAMINATION ONLY REQUIRES FULL SITE ASSESSMENT RAP
<b>Reported:</b> 3/30/1989	
<b>Date Entered:</b> 4/10/1989	<b>Status Code:</b> 6A - FINAL CONCURRENCE ISSUED
<b>Closure Date:</b> 6/13/1990	
<b>Facility Name:</b> MABRY FOUNDRY	
<b>TCEQ Region:</b> 10	<b>Program Area:</b> 2 - REGION

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<b>MAP ID</b>  <b>23</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6534 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.365 SW	BEAUMONT TX 77705-6969

**FACILITY INFORMATION**

**EPA ID Number:** TXR000028050  
**Current Site Name:** COASTAL CHEMICAL  
**NAICS Code:** 42469  
**NAICS Description:** Other Chemical and Allied Products Merchant Wholesalers  
**Hazardous Report Universe Record:** Small Quantity Generator Universe  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Small Quantity Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:
1	HQ120	WRITTEN INFORMAL	State	02/28/2017

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
1	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	02/02/2017	Y
2	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	08/09/2017	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
279.C	Standards for Used Oil Generators	State	

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b> <b>24</b>	<b>HAZARD TYPE:</b> RCRA <b>DISTANCE:</b> 0.487 NE	<b>FACILITY ADDRESS:</b> 7085 FANNETT RD BEAUMONT TX 77720
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**FACILITY INFORMATION**

**EPA ID Number:** TX0000067710  
**Current Site Name:** MAXIM CRANE RENTAL  
**NAICS Code:** 333923  
**NAICS Description:** Overhead Traveling Crane, Hoist, and Monorail System Manufacturing  
**Hazardous Report Universe Record:** Other  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Not a Generator  
**Transporter:** N  
**Active Site Universe:**  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b>  <b>25</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 6817 INDUSTRIAL ROAD
	<b>DISTANCE:</b> 0.586 SW	BEAUMONT TX 77705

**FACILITY INFORMATION**

**EPA ID Number:** TXD008068298  
**Current Site Name:** GULF COAST MACHINE & SUPPLY COMPANY  
**NAICS Code:** 332111  
**NAICS Description:** Iron and Steel Forging  
**Hazardous Report Universe Record:** Conditionally Exempt Small Quantity Generator Universe  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Conditionally Exempt Small Quantity Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:
1	HQ120	WRITTEN INFORMAL	State	12/21/2007

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
1	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	10/23/2007	Y
2	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	01/29/2008	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b>  <b>26</b>	<b>HAZARD TYPE:</b> RCRA <b>FACILITY ADDRESS:</b> 7130 GARTH ST  <b>DISTANCE:</b> 0.63 SW      BEAUMONT TX 77705-6882
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**FACILITY INFORMATION**

**EPA ID Number:** TXR000083909  
**Current Site Name:** HMFR BEAUMONT PLANT  
**NAICS Code:**  
**NAICS Description:**  
**Hazardous Report Universe Record:** Large Quantity Generator Universe  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Large Quantity Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:



<b>MAP ID</b>  <b>27</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 7218 GARTH ST
	<b>DISTANCE:</b> 0.672 S	BEAUMONT TX 77705-6884

**FACILITY INFORMATION**

**EPA ID Number:** TXD982287773  
**Current Site Name:** METALFORMS  
**NAICS Code:** 332313  
**NAICS Description:** Plate Work Manufacturing  
**Hazardous Report Universe Record:** Small Quantity Generator Universe  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Small Quantity Generator  
**Transporter:** N  
**Active Site Universe:** Handler  
**Operating TSDF (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:
1	HQ120	WRITTEN INFORMAL	State	03/24/2015

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:
1	CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	State/Territory	02/05/2015	Y
2	NRR	NON-FINANCIAL RECORD REVIEW	State/Territory	07/31/2015	N

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
279.C	Standards for Used Oil Generators	State	
262.C	Standards Applicable to Generators of HW: Pre-Transport Requirements	State	
265.I	Interim Status Standards for Owners and Operators of HW TSDs: Use and Management	State	
262.D	Standards Applicable to Generators of HW: Recordkeeping and Reporting	State	
265.J	Interim Status Standards for Owners and Operators of HW TSDs: Tank Systems	State	
265.J	Interim Status Standards for Owners and Operators of HW TSDs: Tank Systems	State	
262.D	Standards Applicable to Generators of HW: Recordkeeping and Reporting	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	
265.B	Interim Status Standards for Owners and Operators of HW TSDs: General Fac Stds	State	
262.C	Standards Applicable to Generators of HW: Pre-Transport Requirements	State	
XXS	State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements	State	

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

MAP ID

27

HAZARD TYPE: RCRA

FACILITY ADDRESS: 7218 GARTH ST

DISTANCE: 0.672 S

BEAUMONT TX 77705-6884

<b>MAP ID</b>  <b>28</b>	<b>HAZARD TYPE:</b> SEMS	<b>FACILITY ADDRESS:</b> 500 INDUSTRY RD
	<b>DISTANCE:</b> 0.7 SW	BEAUMONT TX 77702

**FACILITY INFORMATION**

**EPA ID Number:** TXD050293794  
**Site ID Number:** 601974  
**Site Name:** INTERNATIONAL GALVANIZERS INC  
**Site Status:** Archived  
**County:** JEFFERSON  
**Federal Facility Indicator:** N  
**NPL Status:** Not on the NPL  
**Non-NPL Status:** NFRAP-Site does not qualify for the NPL based on existing information

**INSTITUTIONAL CONTROLS:**

**This Site has Institutional Controls:** No  
**Institutional Controls URL:**

**ACTION DETAILS:**

Operating Unit:	Action Code:	Action Name:	Start Date:	Finish Date:	Quality:	Current Action Lead:
0	DS	DISCVRY	5/1/1980	5/1/1980		EPA Perf
0	PA	PA		2/1/1981	L	EPA Perf
0	SI	SI	7/1/1981	7/1/1981	N	EPA Perf
0	VS	ARCH SITE		7/1/1981		EPA Perf In-Hse

**NPL SITE DETAILS**

**NPL Site Type:** Not an NPL Site

**SMELTER RELATED OPERATIONS**

Contaminant Name:	Chain of Custody Indicator:	NPL Status:	Native American Interest?	Federal Facility?	Primary Site Subtype	Non-Primary Site Subtype	Special Initiative

**RECORDS OF DECISION:**

Action Name:	Operable Unit Name:	Sequence ID:	Actual Completion Date:	NPL Status:	Non NPL Status:

<b>MAP ID</b>  <b>29</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> 685 INDUSTRIAL RD
	<b>DISTANCE:</b> 0.7 SW	BEAUMONT TX 77705

**FACILITY INFORMATION**

**EPA ID Number:** TXD982287492  
**Current Site Name:** FUTURE FOAM INC  
**NAICS Code:**  
**NAICS Description:**  
**Hazardous Report Universe Record:** Other  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Not a Generator  
**Transporter:** N  
**Active Site Universe:**  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:

<b>MAP ID</b>  <b>30</b>	<b>HAZARD TYPE:</b> RCRA	<b>FACILITY ADDRESS:</b> INDUSTRIAL ROAD 10 MI S OF BEA
	<b>DISTANCE:</b> 0.7 SW	BEAUMONT TX 77705

**FACILITY INFORMATION**

**EPA ID Number:** TXD988080222  
**Current Site Name:** WEATHERFORD-PETCO INC  
**NAICS Code:** 532299  
**NAICS Description:**  
**Hazardous Report Universe Record:** Other  
**Full Enforcement Universe:**  
**Federal Waste Generator Code:** Not a Generator  
**Transporter:** N  
**Active Site Universe:**  
**Operating TSD (Treatment, Storage, or Disposal Unit) Universe:**

**CORRECTIVE ACTION:**

**Corrective Action Workload?:** No

**ENFORCEMENTS**

Identifier:	Type:	Description:	Agency:	Date Issued:

**EVALUATIONS**

Identifier:	Type:	Description:	Agency:	Start Date:	Violation Found:

**VIOLATIONS**

Type:	Description:	Agency:	Scheduled Compliance Date:

**INSTITUTIONAL AND ENGINEERING CONTROLS:**

Site ID:	Site Name:	Event Code:	Event Description:	Actual Date:



## Ungeocodables

The following sites were not geocoded due to mapping and/or database limitations. These sites are believed to be within the subject sites zip code or in an adjacent zip code within 1/2 mile of the subject property, but due to database inaccuracies, no guarantees can be made that these sites actually exist within the zip code nor can it be guaranteed that the listed sites are the only sites in the zip code.

The following ZIP codes have been searched for ungeocodables 77705 77713 77707

Facility ID	Type	Facility Name	Street Address
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No Ungeocoded Sites

## DATA SOURCES

SEMS Superfund Enterprise Management System - Effective January 31, 2014, the Superfund program decommissioned CERCLIS and transitioned to the Superfund Enterprise Management System (SEMS). CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) was a database used by the U.S. Environmental Protection Agency (EPA) to track activities under its Superfund program. The reports previously generated by the CERCLIS legacy system are now updated with SEMS – the Superfund Enterprise Management System – and include the same data and content. This database is the source for CERCLIS, NPL, NPL Delisted, NFRAP and IC/EC.

RCRA Resource Conservation and Recovery Act Information - RCRAInfo is the U.S. Environmental Protection Agency's comprehensive information and inventory system that supports the RCRA (1976) and HSWA (1984) through the tracking of events and activities regarding permit/closure status, compliance with Federal and State regulations and cleanup activities at facilities that generate, treat, store or dispose of hazardous waste. Information on cleaning up after accidents or other activities that result in a release of hazardous materials to the water, air or land is also reported through RCRAInfo. Corrective Action is a requirement under RCRA which requires TSD facilities owners and operators to investigate and cleanup hazardous waste releases into soil, groundwater, surface water and air. The 2020 Corrective Action Baseline includes properties that are heavily contaminated, others that were contaminated but have since been cleaned up or have not been fully investigated yet, and may require little or no remediation. This list of facilities was last updated by the EPA in 2013.

ACRES Assessment, Cleanup and Redevelopment Exchange System (EPA Brownfield) - The EPA's ACRES database stores information reported by EPA Brownfields Grantees on Brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. Recipients are awarded EPA Brownfields funding to address hazardous substances and/or petroleum contamination at brownfield properties. The EPA's Brownfields Program is designed to empower states, communities, and other stakeholders in economic redevelopment to work together in a timely manner to prevent, assess, safely clean up, and sustainably reuse brownfields.

Land Use Controls (LUCs) - Land Use controls may consist of Institutional Controls (ICs) and Engineering Controls (ECs). LUCs help to minimize the potential for exposure to contamination and/or protect the integrity of a response action and are typically designed to work by limiting land and/or resource use or by providing information that helps modify or guide human behavior at a site. Institutional Controls (ICs) are non-engineering measures and are almost always used in conjunction with, or as a supplement to, other measures such as waste treatment or containment. There are four categories of ICs: Governmental Controls (zoning restrictions, ordinances, statues, building permits or other provisions that restrict land or resource use at a site), Proprietary Controls (easements, covenants, Deed Restrictions), Enforcement and Permit Tools (consent decrees, administrative orders), and Informational Devices (State Registries of contaminated sites, deed notices and advisories). ICs are used when contamination is first discovered, when remedies are ongoing and when residual contamination remains onsite at a level that does not allow for unlimited use and unrestricted exposure after cleanup. Engineering Controls (ECs) encompass a variety of engineered and constructed physical barriers to contain and/or prevent exposure to contamination on a property. ECs are often installed during cleanup as a condition of a no further action determination and are generally intended to be in place for long periods of time.

ERNS Emergency Response Notification System – is the database used to store information on notifications of oil discharges and hazardous substances release. The ERNS program is a cooperative data sharing effort among the Environmental Protection Agency (EPA) Headquarters, the Department of Transportation (DOT), National Transportation Systems Center (NTSC), the ten EPA Regions, the U.S. Coast Guard (USCG), and the National Response Center (NRC). ERNS provide the most comprehensive data compiled on notifications of oil discharges and hazardous substances releases in the United States. The types of release reports that are available in ERNS fall into three major categories: substances designated as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended; oil and petroleum products (Clean Water Act of 1972), as amended by the Oil Pollution Act of 1990; and all other types of materials. ERNS is a database of initial notifications and not incidents, so there are limitations to the data. There may be multiple reports for a single incident, and because reports are taken over the phone, misspellings, and locational information limit the quality of some data.

State Superfund Registry in Texas - was established by the 69th Texas Legislature in 1985 and administered by TCEQ lists those abandoned or inactive sites that have serious contamination but do not qualify for the federal program, and therefore are cleaned up under the state program. The state must comply with federal guidelines in administering the state Superfund program, but EPA approval of the state Superfund actions is not required. The Remediation Division manages Superfund sites, or provides management assistance to EPA on RP-lead Superfund sites, after the site is identified as being eligible for listing on either the state Superfund registry or the federal National Priorities List (NPL).

Municipal Solid Waste – MSW data is provided by the State and the state's 24 Councils of Governments (COGs) which have been designated as the regional municipal solid waste planning entities for Texas and are responsible for developing municipal solid waste management plans (regional plans) to encourage regional approaches to providing services and reducing MSW generation. Data on Municipal Solid Waste Facilities in Texas includes:

- MSW- Facilities (MSW) - Issued permits and other authorizations as well as pending applications for municipal solid waste landfills and processing facilities that are active, inactive, or not yet constructed.
- MWS-Closed (MSW-C) - Issued and revoked permits and other authorizations for municipal landfills and processing facilities that have closed, and applications that were withdrawn or denied.
- Closed Landfill Inventory (CLI) - Historical information listing old, closed unnumbered MSW landfills that were operated before permits were required, as well as unauthorized landfills, and miscellaneous illegal dumps and disposal site. Approximately 4200 sites were compiled in 1993, by the TCEQ in conjunction with Southwest Texas State University and the 24 COGS in Texas; estimated point locations were mapped and available historical information was collected into a database for each county and COG.

TCEQ Petroleum Storage Tank Program (PST) - regulates underground storage tanks (USTs), and to a lesser extent, aboveground storage tanks (ASTs), containing petroleum or hazardous substances. The PST Program has established action levels and screening criteria for PST chemicals of concern (COCs), to help determine whether sites must be assigned an LPST number and further investigation.

## DATA SOURCES

TCEQ Leaking Petroleum Storage Tanks (LPST) data – is maintained the Remediation Division oversees the cleanup of petroleum substance and hazardous releases from regulated aboveground and underground storage tanks.

TCEQ Release Determination Reports (RDR) – are reported to the PST Program and maintained by the Remediation Division. These are used to report the results from an investigation of a suspected or confirmed release. A RDR is not always associated with a registered LPST or PST site. The RDR dataset included in this search is limited.

TCEQ Innocent Owner / Operator Program (IOP) The Texas IOP created by House Bill 2776 of the 75th Legislature, provides a certificate to an innocent owner or operator if their property is contaminated as a result of a release or migration of contaminants from a source or sources not located on the property, and they did not cause or contribute to the source or sources of contamination.

TCEQ Voluntary Cleanup Program (VCP) - provides administrative, technical, and legal incentives to encourage the cleanup of contaminated sites in Texas. Since all non-responsible parties, including future lenders and landowners, receive protection from liability to the state of Texas for cleanup of sites under the VCP, most of the constraints for completing real estate transactions at those sites are eliminated. As a result, many unused or under used properties may be restored to economically productive or community beneficial use. Also under the VCP, site cleanups follow a streamlined approach to reduce future human and environmental risk to safe levels. The Texas Voluntary Cleanup Program (VCP) Database provides general information on contaminated sites addressed under the Texas VCP. Institutional and Engineering Controls (IC) are included in the VCP database.

TCEQ Brownfields Site Assessments (BSA) – The BSA Program administers a grant provided by the EPA to perform Brownfields site assessment for local governments and non-profit organizations who are not responsible parties. TCEQ works in close partnership with the EPA and other federal, state, and local redevelopment agencies, and stakeholders, to facilitate cleanup, transfer and revitalization of Brownfields through the development of regulatory, tax, and technical assistance tools.

TCEQ Industrial and Hazardous Waste Program (IHW) – The Texas Commission on Environmental Quality (TCEQ) oversees both wastes generated in Texas and those generated outside the state and sent to Texas for treatment, storage, and/or disposal. hazardous waste is one that is listed as such by the EPA or that exhibits one or more hazardous characteristics (ignitability, reactivity, corrosiveness, or toxicity). Owners or operators of hazardous waste management units must have permits during the active life (including the closure period) of the unit and are subject to both state and federal requirements. The Industrial and Hazardous Waste Datasets are statewide files from the TRACs-IHW system that include the permitting and annual reporting of industrial and hazardous wastes to the TCEQ.

TCEQ Industrial and Hazardous Waste Corrective Action Program (IHWCA) - The Remediation Division of the TCEQ oversees the Corrective Action Program. Corrective Action is triggered when there is a documented release of hazardous waste constituents to the environment; these releases are the result of the past and present activities at RCRA-regulated facilities. The Corrective Action process includes the investigation/evaluation, and if necessary remediation and cleanup of any contaminated air, groundwater, surface water, or soil of hazardous waste management spills or releases from waste management units and release areas, to ensure protection of human health and the environment. Corrective action requirements apply to all solid waste management units and areas of concern at a facility requiring regulatory agency permitting or closure.

Dry Cleaner Registration (DCR) - State law requires that all dry-cleaning drop stations and facilities register annually with the TCEQ, which implements performance standards at these facilities as appropriate.

TCEQ Dry Cleaner Remediation Program (DCRP) - was established under House Bill 1366 (Sept. 1, 2003) which established new environmental standards for dry cleaners and a remediation fund to assist with remediation of contamination caused by dry cleaning solvents. The program establishes a prioritization list of dry cleaner sites and administers the Dry Cleaning Remediation fund.

Municipal Setting Designations (MSD) - is an official state designation given to property within a municipality or its extraterritorial jurisdiction that certifies that designated groundwater at the property is not used as potable water, and is prohibited from future use as potable water because that groundwater is contaminated in excess of the application potable-water protective concentration level. The prohibition must be in the form of a city ordinance or a restrictive covenant that is enforceable by the city and filed in the property records. MSD is managed by the Remediation Division.

Railroad Commission of Texas Brownfields Response Program (BRP) - The Railroad Commission of Texas (RRC) regulates the exploration, production and transportation of oil and natural gas in Texas. The Brownfields response program (BRP) is designed to identify brownfields associated with oil and gas activities and to promote voluntary cleanup by providing federal grant funding for environmental site assessments. The objective of the BRP is to restore brownfields properties in communities across Texas by increasing the redevelopment potential of abandoned oil and gas sites.

Railroad Commission of Texas Voluntary Cleanup Program (RRC-VCP) - The purpose of the voluntary cleanup program is to provide an incentive to cleanup property contaminated by activities under Railroad Commission jurisdiction by removing the liability to the state of lenders, developers, owners, and operators who did not cause or contribute to contamination (a waste, pollutant or other substance or material regulated by or that results from an activity under the jurisdiction of the RRC) released at the site. The program is restricted to voluntary actions but does not replace other voluntary actions.



## DATA SOURCES

Tribal Databases – The United States has a unique legal relationship with federally-recognized Indian tribes based on the Constitution, treaties, statues, executive orders and court decisions. The EPA became the first federal agency to adopt a formal Indian Policy (1984) of working with tribes on a government-to-government basis. There are 561 federally-recognized tribes within the United States. Each tribe is an independent, sovereign nation, responsible for setting standards, making environmental policy, and managing environmental programs for its people. In Texas, these include the Alabama-Coushatta Tribe of Texas, Kickapoo Traditional Tribe of Texas, and the Ysleta Del Sur Pueblo of Texas. The EPA Region 6 Tribal Team members work as liaisons and partner with Tribes in Region 6 on a government-to-government basis, consistent with their inherent sovereignty, assisting other EPA Divisions to resolve environmental issues, consult, and support the development of tribal environmental protection programs. The American Indian Environmental Office manages the Tribal Air, Compliance Enforcement, Waste, Solid Waste and Emergency Response (OSWER), Underground Storage Tanks, Water programs, Brownfields Land Revitalization, Emergency Management, Federal Facilities Restoration and Reuse Office, Office of Resource Conservation and Recovery, Office of Superfund Remediation and Technology Innovation and Office of Underground Storage Tanks (OUST) have tribal response programs or coordinate with Indian tribes. Tribal facility information within these programs is reported through the EPA.



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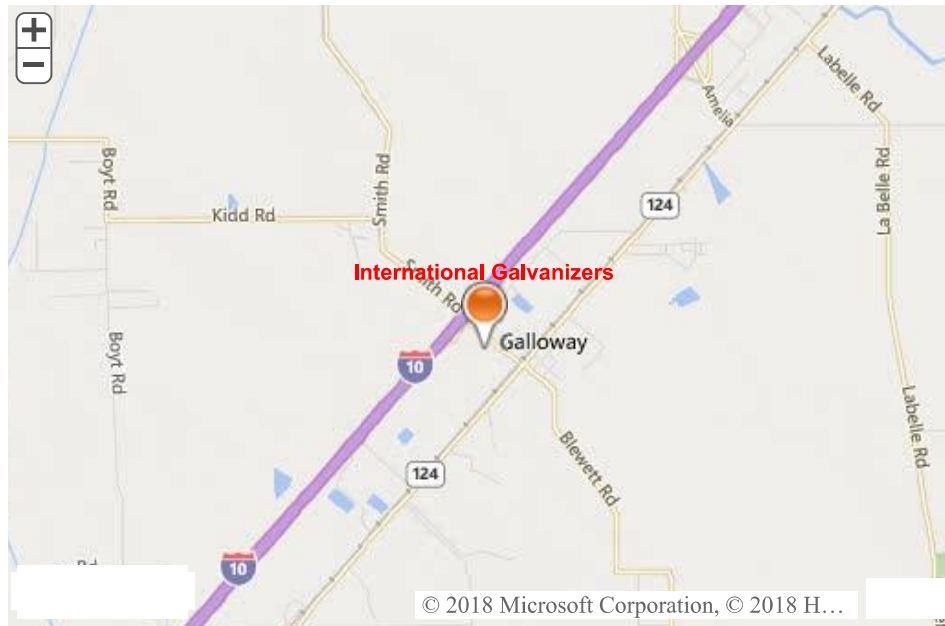
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**INTERNATIONAL GALVANIZERS  
5898 INDUSTRIAL RD  
BEAUMONT, TX 777056959**



*\*You can navigate within the map with your mouse.*

**EPA Facility Information**

*This query was executed on JUN-21-2018*

**AFS Information**

<b><u>Operating Status:</u></b>	O	<b><u>HPV Flag:</u></b>	
<b><u>Operating Status Description:</u></b>	OPERATING	<b><u>State Registration Number:</u></b>	RN100634120
<b><u>State County Compliance Source:</u></b>	4824500712	<b><u>Government Facility Code Description:</u></b>	PRIVATELY OWNED/OPERATED

<b><u>Region Code:</u></b>	06	<b><u>Class Code:</u></b>	B
<b><u>Primary SIC Code:</u></b>	3479	<b><u>Class Code Description:</u></b>	POTENTIAL UNCONTROLLED EM
<b><u>Primary SIC Description:</u></b>	METAL COATING AND ALLIED	<b><u>Compliance Status:</u></b>	3
<b><u>NAICS Code:</u></b>	332812	<b><u>Compliance Status Description:</u></b>	IN COMPLIANCE - INSPECTIO
<b><u>NAICS Code Description:</u></b>	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Servic	<b><u>Date Plant Information Last Updated:</u></b>	11/29/2012

#### Air Program Information

<b><u>Air Program Code</u></b>	<b><u>Air Program Description</u></b>	<b><u>Air Program Status</u></b>	<b><u>Air Program Status Description</u></b>	<b><u>Air Program Subpart</u></b>	<b><u>Air Program Subpart Description</u></b>	<b><u>Class Code</u></b>	<b><u>Class Code Description</u></b>	<b><u>Compliance Status</u></b>	<b><u>Compliance Status Description</u></b>
V	TITLE V PERMITS	O	OPERATING			B	POTENTIAL UNCONTROLLED EM	3	IN COMPLIANCE - INSPECTIO

#### Pollutant Data

<b><u>Air Program Code</u></b>	<b><u>Pollutant Code / CAS Number</u></b>	<b><u>Pollutant / CAS Description</u></b>	<b><u>Attain Indicator</u></b>	<b><u>Attain Indicator Description</u></b>	<b><u>Pollutant Compliance Status</u></b>	<b><u>ES Pollutant Compliance Description</u></b>	<b><u>Pollutant Class Code</u></b>	<b><u>Pollutant Class Description</u></b>
V	FACIL	<u>FACILITY-WIDE PERMIT REQUIREMENTS</u>	A	ATTAINMENT AREA FOR A GIV	P	PRESENT, SEE OTHER PROGRA	B	POTENTIAL UNCONTROLLED EM
V	NO2	<u>NITROGEN DIOXIDE</u>	G	MARGINAL	3	IN COMPLIANCE - INSPECTIO	B	POTENTIAL UNCONTROLLED EM
V	VOC	<u>VOLATILE ORGANIC COMPOUNDS</u>	G	MARGINAL	3	IN COMPLIANCE - INSPECTIO	B	POTENTIAL UNCONTROLLED EM

**Compliance Monitoring System Plan**

<u>CMS Start Date</u>	<u>FY2008 CMS Indicator</u>	<u>FY2008 CMS Indicator Description</u>	<u>FY2009 CMS Indicator</u>	<u>FY2009 CMS Indicator Description</u>
19-NOV-12				

**Plant Actions**

<u>Action Number</u>	<u>Key Action Numbers</u>	<u>Air Program Codes</u>	<u>National Action Type</u>	<u>National Action Description</u>	<u>Action Type</u>	<u>Action Description</u>	<u>Date Achieved</u>	<u>Penalty Amount</u>	<u>Results Code</u>	<u>Results Code Description</u>	<u>Pollutant Code</u>	<u>Regional Data Element</u>	<u>Regional Data Element 16</u>
80000		V			00	TX ACTIONS> 80K	01-JAN-12						

Additional Information can be obtained from Air Facility System **AFS** Search.

**BR Information**

**Facility Information:**

<u>HANDLER NAME:</u>	INTERNATIONAL GALVANIZERS INC	<u>HANDLER ID:</u>	TXD050293794
<u>STREET 1:</u>	INDUSTRY ROAD	<u>REPORTING YEAR:</u>	2005
<u>STREET 2:</u>			
<u>CITY:</u>	BEAUMONT	<u>GENERATOR STATUS:</u>	Federal = LQG

<b><u>STATE:</u></b>	TX	<b><u>ZIP CODE:</u></b>	77705
<b><u>COUNTY:</u></b>	JEFFERSON	<b><u>PENALTY:</u></b>	

***Mailing Information:***

<b><u>HANDLER NAME:</u></b>	INTERNATIONAL GALVANIZERS INC
<b><u>STREET 1:</u></b>	S UNIVERSITY DR
<b><u>STREET 2:</u></b>	
<b><u>CITY:</u></b>	FORT WORTH
<b><u>STATE:</u></b>	TX
<b><u>ZIP CODE:</u></b>	76107-5734

***Basic Waste Information:***

**Note:** Please note that the wastes shown in the following table are in tons.

<b><u>WASTE TYPE</u></b>	<b><u>NATIONAL REPORT</u></b>
<u>GENERATION</u>	1626.2
<u>MANAGEMENT</u>	18.4
<u>WASTE_RECEIVED</u>	
<u>WASTE SHIPPED</u>	1607.8
<u>INCINERATION</u>	
<u>DISPOSAL</u>	
<u>ACUTE GENERATION</u>	

Additional information can be obtained from the Biennial Reporting **BR** Search.

### RCRAInfo

<b><u>HANDLER ID:</u></b>	TXD050293794
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### LIST OF NAICS CODES AND DESCRIPTIONS

<b><u>NAICS CODE</u></b>	<b><u>NAICS DESCRIPTION</u></b>
33991	JEWELRY AND SILVERWARE MANUFACTURING
332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS

### HANDLER / FACILITY CLASSIFICATION

Unspecified Universe for the facility listed above.

<b><u>HANDLER TYPE</u></b>
Large Quantity Generator

No PROCESS INFORMATION is available for the facility listed above.

Additional Information can be obtained from Resource Conservation and Recovery Information **RCRAInfo** Search.







**Related Topics:** Envirofacts

FRS

## FRS Facility Detail Report

### INTERNATIONAL GALVANIZERS

**EPA Registry Id:** 110064118468  
 5898 INDUSTRIAL RD  
 BEAUMONT, TX 777056959

#### Legend

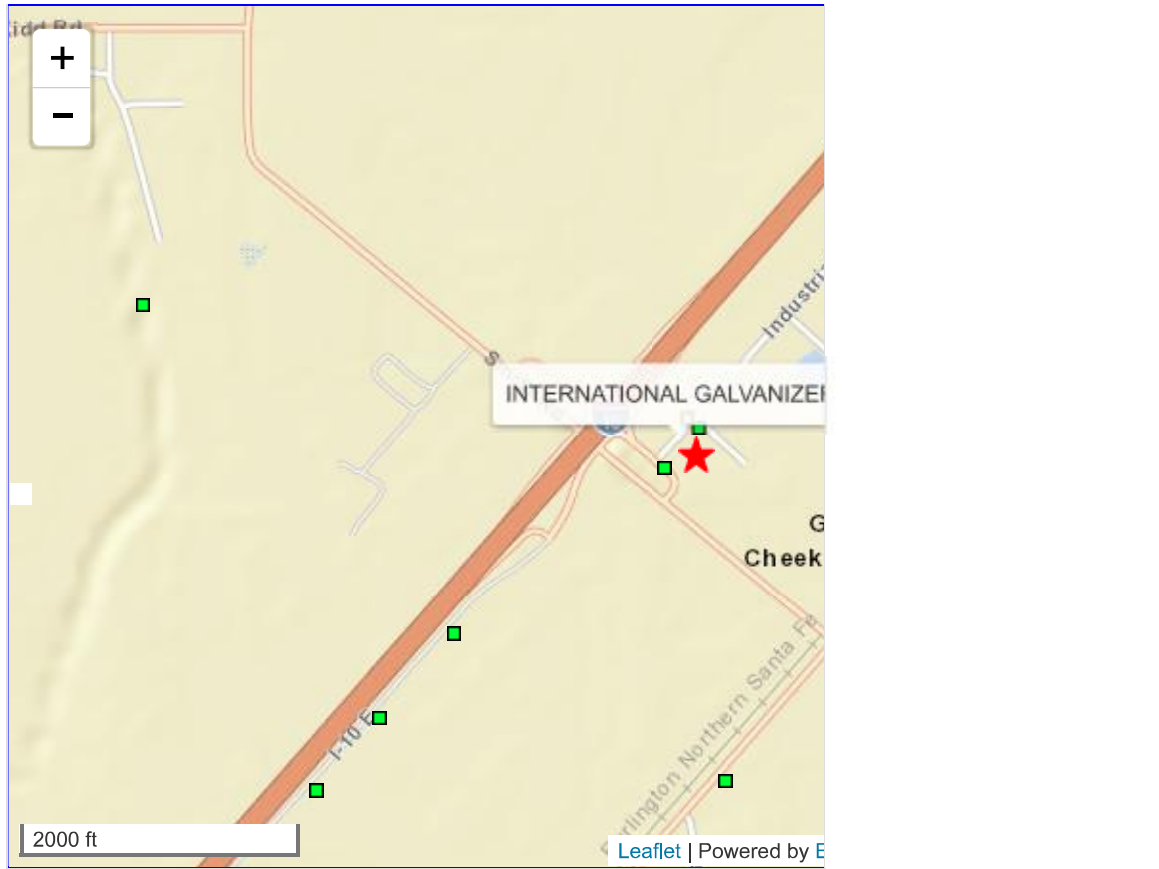
- ★ Selected Facility
- EPA Facility of Interest
- State/Tribe Facility of Interest

The facility locations displayed come from the FRS Spatial Coordinates tables. They are the best representative locations for the displayed facilities based on the accuracy of the collection method and quality assurance checks performed against each location. The North American Datum of 1983 is used to display all coordinates.

### Facility Registry Service Links:

- Facility Registry Service (FRS) Overview
- FRS Facility Query
- FRS Organization Query
- EZ Query
- FRS Physical Data Model
- FRS Geospatial Model

[Report an Error](#)



### Environmental Interests

Information System	System Facility Name	Information System Id/Report Link	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests:
ICIS-AIR (AIR)	INTERNATIONAL GALVANIZERS	TX0000004824500712	AIR MAJOR	ICIS	10/19/2014	
BIENNIAL REPORTERS	INTERNATIONAL GALVANIZERS	TXD050293794	HAZARDOUS WASTE BIENNIAL REPORTER	RCRAINFO	12/31/2015	
AIR FACILITY SYSTEM	INTERNATIONAL GALVANIZERS	4824500712	AIR MINOR (OPERATING)	AIRS/AFS	11/29/2012	
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY - AGENCY CENTRAL REGISTRY	INTERNATIONAL GALVANIZERS	RN100634120	STATE MASTER	TX-TCEQ ACR		<b>ACCOUNT NUMBER- JE0051A</b> AIR PROGRAM <b>AFS NUM-4824500712</b> AIR PROGRAM <b>ACCOUNT NUMBER- JE0051A</b> AIR PROGRAM <b>PERMIT-TXR05U366</b> NPDES STORMWATER PERMIT <b>EPA ID-TXD050293794</b> HAZARDOUS WASTE PROGRAM <b>ACCOUNT NUMBER- JE0051A</b> AIR EMISSION INVENTORY <b>PERMIT-TXR05M685</b> NPDES STORMWATER PERMIT <b>PERMIT-56312</b> AIR PROGRAM <b>PERMIT-56312</b> AIR PROGRAM <b>SOLID WASTE REGISTRA-30568</b> HAZARDOUS WASTE PROGRAM
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	INTERNATIONAL GALVANIZERS	TXD050293794	LQG (Y)	RCRAINFO	12/21/2017	
<b>Additional EPA Reports:</b>	<a href="#">MyEnvironment</a> <a href="#">Enforcement and Compliance</a> <a href="#">Site Demographics</a> <a href="#">Facility Coordinates Viewer</a> <a href="#">Environmental Justice Map Viewer</a> <a href="#">Watershed Report</a>					

Standard Industrial Classification Codes (SIC)			
Data Source	SIC Code	Description	Primary
AIRS/AFS	3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED	
AIR	3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED	
TX-TCEQ ACR	3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED	

Facility Codes and Flags	
EPA Region:	06
Duns Number:	
Congressional District Number:	14
Legislative District Number:	10
HUC Code/Watershed:	12040201 / SABINE LAKE
US Mexico Border Indicator:	NO
Federal Facility:	NO
Tribal Land:	NO

Alternative Names	
No Alternative Names returned.	

Organizations				
Affiliation Type	Name	DUNS Number	Information System	Mailing Address
OPERATOR	F.J. DEAN, INC.		TX-TCEQ ACR	
OWNER	AZZ INCORPORATED		RCRAINFO	
OWNER	AZZ INCORPORATED		RCRAINFO	

National Industry Classification System Codes (NAICS)				
Data Source	NAICS Code	Description	Primary	
AIRS/AFS	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.		
AIR	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.		
TX-TCEQ ACR	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.		
RCRAINFO	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.		

Facility Mailing Addresses					
Affiliation Type	Delivery Point	City Name	State	Postal Code	Information System
FACILITY MAILING ADDRESS	PO BOX 21677	BEAUMONT TX		77720	RCRAINFO
MAILING ADDRESS	5898 INDUSTRIAL RD	BEAUMONT TX		77705	TX-TCEQ ACR

Contacts				
Affiliation Type	Full Name	Office Phone	Information System	Mailing Address
REGULATORY CONTACT	HENRY NETHERLAND	4098420216	RCRAINFO	

Query executed on: JUN-21-2018

Last updated on September 24, 2015

# Detailed Facility Report

## Facility Summary

**INTERNATIONAL GALVANIZERS**

**5898 INDUSTRIAL RD, BEAUMONT, TX 77705** ⓘ

FRS (Facility Registry Service) ID: 110064118468

EPA Region: 06

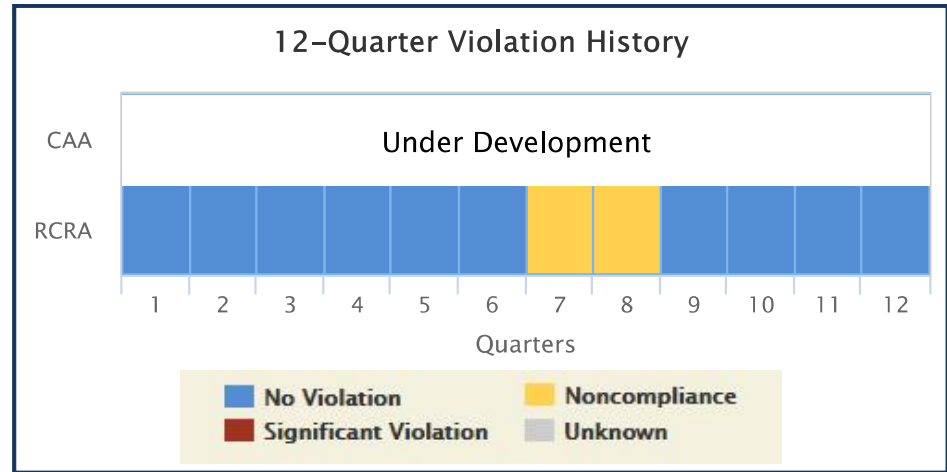
Latitude: 29.986604

Longitude: -94.207171

Locational Data Source: FRS

Industry: Fabricated Metal Product Manufacturing

Indian Country: N



## Enforcement and Compliance Summary ⓘ

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs in NC (Noncompliance) (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	-	--		0	0	--	-	-	-	--
RCRA	1	03/23/2017	No Violation	2	0	1	-	-	-	--

## Regulatory Information

Clean Air Act (CAA): Operating Major (TX0000004824500712)

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active (H) LQG (TXD050293794)

Safe Drinking Water Act (SDWA): No Information

## Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No

Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information

# Facility/System Characteristics

## Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110064118468					N	29.986604	-94.207171
AIR	CAA	TX0000004824500712	Major Emissions	Operating	CAATVP		N		
RCR	RCRA	TXD050293794	LQG	Active (H)			N	29.994196	-94.197701

## Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110064118468	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD, BEAUMONT, TX 77705
AIR	CAA	TX0000004824500712	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD, BEAUMONT, TX 777056959
RCR	RCRA	TXD050293794	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD, BEAUMONT, TX 77705-6959

## Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Desc
AIR	TX0000004824500712	3479	Metal Coating And Allied Services

## Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
AIR	TX0000004824500712	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
RCR	TXD050293794	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

## Facility Tribe Information

Reservation Name	Tribe Name	EPA Tribal ID	Distance to Tribe (miles)
No data records returned			

# Enforcement and Compliance

## Compliance Monitoring History (5 years)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	TXD050293794	RCR	<i>NON-FINANCIAL RECORD REVIEW</i>	State	08/07/2017	<i>No Violations Or Compliance Issues Were Found</i>
RCRA	TXD050293794	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/23/2017	Violations Or Compliance Issues Were Found

Entries in italics are not considered inspections in official counts.

## Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Description	Current As Of	Qtrs in NC (Noncompliance) (of 12)
CAA	TX0000004824500712	No		06/16/2018	0
RCRA	TXD050293794	No		06/16/2018	2

## Three Year Compliance Status by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
CAA (Source ID: TX0000004824500712)		07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18
	Facility-Level Status	No Violation											
	HPV History												
	Violation Type	Agency	Programs	Pollutants									

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
RCRA (Source ID: TXD050293794)		07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18
RCRA	Facility-Level Status							Violation	Violation				
	Violation	Agency											
RCRA	268.A: LDR - General							MAR-23-2017	JUN-26-2017				
RCRA	270.A: Permits - General Information							MAR-23-2017	JUN-26-2017				
RCRA	265.B: TSD IS-General Facility Standards							MAR-23-2017	JUN-26-2017				

## Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
RCRA	RCR	TXD050293794	WRITTEN INFORMAL	State	05/25/2017

## Formal Enforcement Actions (5 Years)

Statute	System	Law/Section	Source ID	Action Type	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
No data records returned														

## Environmental Conditions

### Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow) Outfalls	12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database))	WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database))	State Waterbody Name (ICIS (Integrated Compliance Information System))	Impaired Waters	Impaired Class	Causes of Impairment(s) by Watershed with FSA (Endangered Species Act)-listed Aquatic Species?
No data records returned								

## Waterbody Designated Uses

Reach Code	Waterbody Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
No data records returned							

## Air Quality

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
No	Ozone	
No	Lead	
No	Particulate Matter	
No	Sulfur Dioxide	

## Pollutants

### Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site

TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Releases
No data records returned								

### Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

Chemical Name
No data records returned

## Demographic Profile

### Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.



Radius of Area:	3	Land Area:	99%	Households in Area:	484
Center Latitude:	29.986604	Water Area:	1%	Housing Units in Area:	561
Center Longitude:	-94.207171	Population Density:	43/sq.mi.	Households on Public Assistance:	2
Total Persons:	1,195	Percent Minority:	52%	Persons Below Poverty Level:	219

Race Breakdown	Persons (%)	Age Breakdown	Persons (%)
White:	623 (52%)	Child 5 years and younger:	61 (5%)
African-American:	482 (40%)	Minors 17 years and younger:	273 (23%)
Hispanic-Origin:	100 (8%)	Adults 18 years and older:	923 (77%)
Asian/Pacific Islander:	32 (3%)	Seniors 65 years and older:	163 (14%)
American Indian:	1 (0%)		
Other/Multiracial:	58 (5%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown	Households (%)
Less than 9th Grade:	36 (4.64%)	Less than \$15,000:	40 (9.66%)
9th through 12th Grade:	69 (8.89%)	\$15,000 - \$25,000:	25 (6.04%)
High School Diploma:	198 (25.52%)	\$25,000 - \$50,000:	84 (20.29%)
Some College/2-yr:	262 (33.76%)	\$50,000 - \$75,000:	64 (15.46%)
B.S./B.A. or More:	211 (27.19%)	Greater than \$75,000:	201 (48.55%)



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### RCRAInfo Links

 RCRAInfo

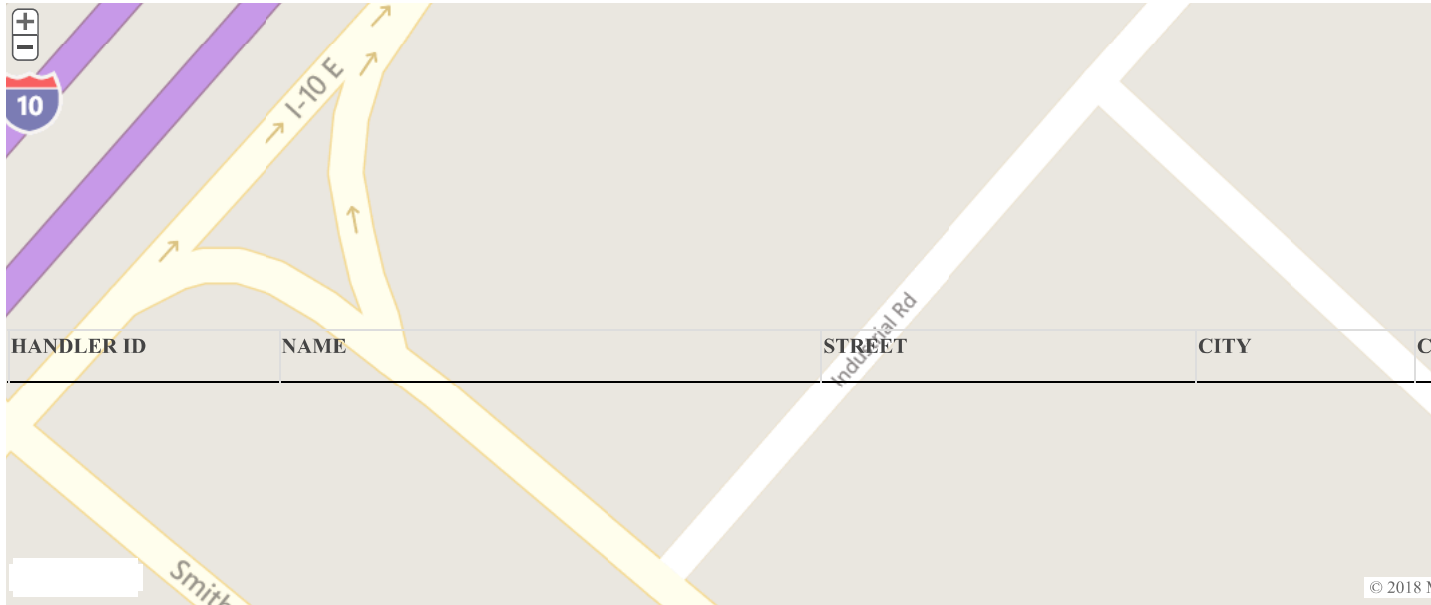


**Consolidated facility information (from multiple EPA systems) was searched to select facilities**

[← Return](#)

**Search Parameters:** EPA Facility ID: Beginning With: 110064118468

Results are based on data extracted on MAY-14-2018



HANDLER ID	NAME	STREET	CITY	COUNTY	STATE	ZIP CODE
------------	------	--------	------	--------	-------	----------

Showing 1 to 1 of 1 entries

Show  entries

Search:

[First](#) [Previous](#) [1](#) [Next](#) [Last](#)

HANDLER ID	NAME	STREET	CITY	COUNTY	STATE	ZIP CODE	LATITUDE/LONGITUDE
<a href="#">TXD050293794</a>	INTERNATIONAL GALVANIZERS	5898 INDUSTRIAL RD	BEAUMONT	JEFFERSON	TX	777056959	29.986604/-94.207171

Showing 1 to 1 of 1 entries

Show  entries

Search:

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**Total Number of Facilities Retrieved: 1**



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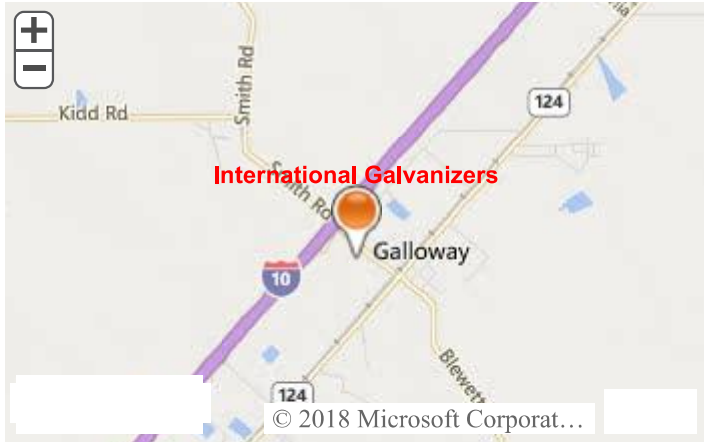
 RCRAInfo



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**RCRAInfo Facility Information**

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<p><b>INTERNATIONAL GALVANIZERS</b>                  Handler ID: TXD050293794                  5898 INDUSTRIAL RD                  BEAUMONT, TX 77705-6959</p> <p><b>County Name:</b> JEFFERSON</p> <p><b>Latitude:</b> 29.986604  <b>Longitude:</b> -94.207171</p> <p><b>Hazardous Waste Generator:</b> Large Quantity Generator</p> <p><b>Owner Name:</b> AZZ INC</p>		 <p><i>*You can navigate within the map with your mouse.</i></p>
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**BIENNIAL REPORT SUMMARY**

<b>REPORT YEAR</b>	<b>GENERATION (Tons)</b>	<b>MANAGEMENT (Tons)</b>	<b>WASTE RECEIVED (Tons)</b>	<b>WASTE SHIPPED (Tons)</b>	<b>INCINERATION (Tons)</b>	<b>DISPOSAL (Tons)</b>	<b>ACUTE GENERATION (Tons)</b>
<u>2015</u>	168.2			168.2			
<u>2013</u>	1200.4	17.3		1183.1			
<u>2011</u>	1162.8	190.2		972.6			
<u>2009</u>	1592.1	8.5		1583.7			
<u>2007</u>	1626.2	18.4		1607.8			
<u>2005</u>	1734.9	77.1		1650.7			
<u>2003</u>	1556.7	242.5		1314.2			
<u>2001</u>	735	16.5		718.5			

### LIST OF FACILITY CONTACTS

<u>NAME</u>	<u>STREET</u>	<u>CITY</u>	<u>STATE</u>	<u>ZIP CODE</u>	<u>PHONE</u>	<u>TYPE OF CONTACT</u>
DARRIAN WRIGHT	5898 INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Public
FRANK GAUDET					409-842-0216	Permit
BOBBY MCKINNEY	INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
HENRY NETHERLAND	5898 INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
DARRIAN WRIGHT	5898 INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
BOBBY MCKINNEY	INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit

TONY PHILLIPS	PO BOX 21677	BEAUMONT	TX	77720	409-842-0216	Permit
RALPH W					409-842-0216	Permit
BOBBY MCKINNEY					409-842-0216	Permit
FRANK GAUDEY	S UNIVERSITY DR STE 200	FORT WORTH	TX	76107	409-842-0216	Permit
BOBBY MCKINNEY	PO 21677	BEAUMONT	TX	77720	409-842-0216	Permit
BOBBY MCKINNEY	PO BOX 21677	BEAUMONT	TX	77720	409-842-0216	Permit
RALPH W BOOKER					409-842-0216	Permit
HENRY NETHERLAND	INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
BOBBY MCKINNEY	5898 INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
BOBBY MCKINNEY	INDUSTRIAL RD	BEAUMONT	TX	77705	409-842-0216	Permit
STEVEN SHEPARD	5898 INDUSTRIAL RD	BEAUMONT	TX	77705-6959	409-842-0216	Permit
PAUL HAMILTON					713-437-7285	Permit
TONY PHILLIPS					409-842-0216	Permit
BOBBY MCKINNEY	S UNIVERSITY DR STE 200	FORT WORTH	TX	76107	409-842-0216	Permit
FRANK GAUDET	S UNIVERSITY DR STE 200	FORT WORTH	TX	76107	409-842-0216	Permit

**HANDLER / FACILITY CLASSIFICATION**

**Unspecified Universe for the facility listed above.**

**HANDLER TYPE**

Large Quantity Generator

**No PROCESS INFORMATION is available for the facility listed above.**

**LIST OF NAICS CODES AND DESCRIPTIONS**

<u>NAICS CODE</u>	<u>NAICS DESCRIPTION</u>
33991	JEWELRY AND SILVERWARE MANUFACTURING
332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS

**LIST OF WASTE CODES AND DESCRIPTIONS**

<u>WASTE CODE</u>	<u>WASTE DESCRIPTION</u>
D002	CORROSIVE WASTE
D006	CADMIUM
D007	CHROMIUM
D008	LEAD
D010	SELENIUM



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**Total Number of Facilities Retrieved: 1**

## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN100634120

**Name:** INTERNATIONAL GALVANIZERS [View Prior Names](#)

**Primary Business:** No primary business description on file.

**Street Address:** 5898 INDUSTRIAL RD, BEAUMONT TX 77705 6959

**County:** JEFFERSON

**Nearest City:** BEAUMONT

**State:** TX

**Near ZIP Code:** 77705




**Physical Location:** No physical location description ON file.

### Affiliated Customers - Current

Your Search Returned **3** Current Affiliation Records ( [View Affiliation History](#) )

*The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.*

#### 1-3 of 3 Records

CN Number ▲	Customer Name	Customer Role(s)	Details
<a href="#">CN600344808</a>	INTERNATIONAL GALVANIZERS INC	OWNER OPERATOR	
<a href="#">CN600344816</a>	AZZ INC	OWNER OPERATOR	
<a href="#">CN603146721</a>	INTERNATIONAL GALVANIZERS PARTNERSHIP LTD	OPERATOR	

### Industry Type Codes

Code	Classification	Name
332812	NAICS	Metal Coating
3479	SIC	Coating
3498	SIC	Fabricated Pipe and Pipe Fittings

### Permits, Registrations, or Other Authorizations

There are a total of **12** programs and IDs for this regulated entity. Click on a column name to change the sort order.

#### 1-12 of 12 Records

Program ▲	ID Type	ID Number	ID Status
AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	<a href="#">JE0051A</a>	ACTIVE
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	JE0051A	ACTIVE
AIR NEW SOURCE PERMITS	AFS NUM	4824500712	ACTIVE
AIR NEW SOURCE PERMITS	PERMIT	<a href="#">56312</a>	ACTIVE

IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30568	INACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXD050293794	ACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	30568	ACTIVE
POLLUTION PREVENTION PLANNING	ID NUMBER	P00344	ACTIVE
STORMWATER	PERMIT	TXR05M685	EXPIRED
STORMWATER	PERMIT	TXR05U366	ACTIVE
TAX RELIEF	ID NUMBER	18841	WITHDRAWN
TAX RELIEF	ID NUMBER	18848	ACTIVE

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## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **IHW Corrective Action Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS BEAUMONT (RN100634120)**

JEFFERSON

Solid Waste **INACTIVE**

Registration Status:

Responsible Parties: **International Galvanizers Partnership, LTD. (CN603146721)** Since 11/07/2006 [View Compliance History](#)

Mailing Address: Not on file

Responsible Parties: **F.J. Dean, Inc. (CN600344808)** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

---

### Related Information:

[Correspondence Tracking](#)

[Corrective Action Information](#)

There is no information related to this Corrective Action in the following categories:

**Commissioners' Actions**

**Effective Enforcement Orders**

**Criminal Convictions**

**Proposed Enforcement Orders**

**Complaints**

**Discharges**

**Emergency Response Events**

**Emission Events**

**Fish Kills**

**Other Incidents**

**Investigations**

**Periodic Reports**

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## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **IHW Corrective Action Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS BEAUMONT (RN100634120)**

JEFFERSON

Solid Waste **INACTIVE**

Registration Status:

Responsible Parties: **International Galvanizers Partnership, LTD. (CN603146721)** Since 11/07/2006 [View Compliance History](#)

Mailing Address: Not on file

Responsible Parties: **F.J. Dean, Inc. (CN600344808)** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

## Correspondence Tracking

Tracking No.	Received/Sent	Direction	Type	Subject	Due Date	End Date	Document Date	Method
10938233	04/06/2005	INCOMING	UNIT CLOSURE PLAN	REQUEST TO CLOSE WMU	07/05/2005	04/19/2005	04/06/2005	
1104049	12/31/2001	OUTGOING	APPROVAL			12/31/2001		USPS
1078296	12/20/2001	INCOMING	RRS DEED CERTIFICATION	REMEDATION RISK REDUCTION STANDARD SUMP FILL AR	04/19/2002	12/31/2001	12/18/2001	USPS
1091261	11/16/2001	OUTGOING	APPROVAL PARTIAL			11/16/2001		USPS
1065508	10/08/1999	INCOMING	RRS FINAL RPT STD 2	WASTE SULFURIC HYDRCHLC ACID EMERG SUMP FILL LIN	02/05/2001	11/16/2001	10/15/1998	USPS

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[Statewide Links](#): [Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

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## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **IHW Corrective Action Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS BEAUMONT (RN100634120)**

JEFFERSON

Solid Waste **INACTIVE**

Registration Status:

Responsible Parties: **International Galvanizers Partnership, LTD. (CN603146721)** Since 11/07/2006 [View Compliance History](#)

Mailing Address: Not on file

Responsible Parties: **F.J. Dean, Inc. (CN600344808)** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Legal	Description	Start Date	End Date	Type	Status	Status Date
30568	IHW CORRECTIVE ACTION	11/22/2002		CLEANUP	INACTIVE	12/31/2001

Tracking No.	Type	Value	Start Date	End Date
9315814	ADMINISTRATIVE STATUS	INACTIVE	12/31/2001	
10939002	PROJECT MANAGER	BWILKINS	04/15/2005	
1060876	PROJECT MANAGER	EHEYER	11/30/1999	04/15/2005
1057103	EPA ID	TXD050293794	01/01/1901	

Physical	Description	Start Date	Type	Status	Status Date
INTERNATIONAL GALVANIZERS BEAUMONT		01/01/1901	IHW CA	COMPLETED WORKLOAD	11/22/2002

Tracking No.	Type	Value	Start Date	End Date
9335957	PROJECT PHASE	COMPLETED WORKLOAD	11/22/2002	
1215323	<a href="#">APPLICABLE PROGRAM RULES</a>	RRR	09/30/2014	
9325566	SOURCE OF RELEASE	EMERGENCY SUMP FILL LINE AREA - Rule: RRS Std: 2 Land Use: C/I	01/01/1901	

[Customer Search](#)[RE Search](#)[ID Search](#)[Document Search](#)[Search Results](#)[TCEQ Home](#)[Query Home](#)

## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

[View Solid Waste Registration](#)

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

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### Related Information:

[Investigations](#)

[Notice of Violations](#)

[Solid Waste Registration Information](#)

There is no information related to this Solid Waste Registration in the following categories:

**Commissioners' Actions**

**Correspondence Tracking**

**Effective Enforcement Orders**

**Criminal Convictions**

**Proposed Enforcement Orders**

**Complaints**

**Discharges**

**Emergency Response Events**

**Emission Events**

**Fish Kills**

**Other Incidents**

**Periodic Reports**

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\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
Notice of Registration  
Industrial and Hazardous Waste

Page: 1  
Date: 05/07/2018

30568 INTERNATIONAL GALVANIZERS

Solid Waste Registration Number: 30568 EPA Id: TXD050293794

Company Name: AZZ Inc.  
Site Name: INTERNATIONAL GALVANIZERS  
Site Location: 5898 Industrial Rd, Beaumont, TX  
Primary Contact: WRIGHT, DARRIAN  
Mailing Address: 5898 INDUSTRIAL RD  
BEAUMONT, TX 77705-6959

Region: 10  
County: 123 JEFFERSON  
Land Type: Private  
Title: PLANT MANAGER  
Site Street Address: 5898 INDUSTRIAL RD  
BEAUMONT, TX 77705

Initial Registration Date: 05/18/1976  
Last Amendment Date: 05/04/2018  
Last Date NOR Computer update: 05/04/2018  
Phone: 409-842-0216

Registration Status: Active  
Registration Type: Generator  
Generator Type: Industrial  
Receiver Type:  
Transporter Type:  
Transport Wst Class:

Reporting Method: STEERS

Hazardous Waste Generation Status: Large Quantity Generator

Universal Waste Activity:  
Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more):  
Type(s) Managed:  
Destination Facility for Universal Waste:  
NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv  
Tax Identification #: 17509482505  
Handler Status:

Operator Information

Name: F.J. Dean, Inc.  
Phone: 409-842-0216  
Address: 5898 INDUSTRIAL RD  
BEAUMONT, TX 77705-6959

Owner Information:

Name: AZZ Inc.  
Phone: 409-842-0216  
Address: 1300 S UNIVERSITY DR STE 200  
FORT WORTH, TX 76107-5734

Billing Contact: PENCE, JASON  
Billing Address: 3100 W 7TH ST STE 500  
FORT WORTH, TX 76107-8701

Title: Phone: 817-810-0095

Other Contact: MICHIE, ERICA  
Mailing Address: 3100 W 7TH ST AZZ INC STE 500  
FORT WORTH, TX 76107-5736

Role: IHW: Steers Contact Phone: 817-810-0095, ext. 4957

Other Contact: Manager, Environmental  
Mailing Address: 1300 S UNIVERSITY DR STE 200  
FORT WORTH, TX 76107-5734

Role: IHW: Owner Contact Phone: 409-842-0216

As of 05/04/2018 - The next unassigned sequence number for WASTES is 0032 and  
The next unassigned sequence number for UNITS is 008



\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

\*\*\*\* WASTE INFORMATION \*\*\*\*

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
***** Active Wastes *****						
0008104H	H	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Spent sulfuric acid from steel pickle operations <b>Texas Form Code:</b> 104 Spent acid without metals <b>EPA Form Code:</b> W103 Spent concentrated acid <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Source Code:</b> G05 Metal forming and treatment (pickling, heat treating, etc.) <b>NAICS Code:</b> 332812 Metal Coating, Engraving (except Jewelry and Silv <b>EPA Hazardous Waste Numbers:</b> D002 D006 D007 D008 D010 <b>Current Management Units:</b> Tank 006						
00103192	2	Active	05/04/2018	On-site	No	No
<b>Description from Generator:</b> Cake from Preflux Filter Press. Preflux tank solution of zinc ammonium chlorideis circulated through plate and frame filter press to remove particulates. Waste is cake from filter press. <b>Texas Form Code:</b> 319 Other waste inorganic solids <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Company's Internal Code(s):</b> CAKE FROM PREFLUX FI <b>Current Management Units:</b> Container storage area 004						
0012319H	H	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Sulfuric acid process tank bottoms clean out. <b>Texas Form Code:</b> 319 Other waste inorganic solids <b>EPA Form Code:</b> W319 Other inorganic solids <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Source Code:</b> G14 Removal of tank sludge, sediments or slag <b>NAICS Code:</b> 332812 Metal Coating, Engraving (except Jewelry and Silv <b>EPA Hazardous Waste Numbers:</b> D002 D006 D007 D008 D010 <b>Current Management Units:</b> Container storage area 004 Miscellaneous storage containers 005						
0013319H	H	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Sodium hydroxide process tank bottoms clean out. <b>Texas Form Code:</b> 319 Other waste inorganic solids <b>EPA Form Code:</b> W319 Other inorganic solids <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Source Code:</b> G14 Removal of tank sludge, sediments or slag <b>NAICS Code:</b> 332812 Metal Coating, Engraving (except Jewelry and Silv <b>EPA Hazardous Waste Numbers:</b> D002 <b>Current Management Units:</b> Container storage area 004 Miscellaneous storage containers 005						

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
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**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
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\*\*\*\*\* Active Wastes \*\*\*\*\*

00169992	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Plant trash from office, break room and plant. Includes paper waste, food waste,waste packaging, and empty containers.  
**Texas Form Code:** 999 Class 2 plant trash  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** PLANT TRASH  
**Current Management Units:** Miscellaneous storage containers 007

00183191	1	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Galvanizing process tanks are skimmed to remove floating debris. The skims are placed in a container with absorbent to dewater the waste.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** SKIMS AND ABSORBENT  
**Current Management Units:** Miscellaneous storage containers 005

00193192	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Dust collected from bag house used to control air emissions from galvanizing kettle.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** BAGHOUSE DUST  
**Current Management Units:** Miscellaneous storage containers 005 007

00203192	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Mixed Sludges from galvanizing processes after stabilization and dewatering.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** STABILIZED SLUDGE  
**Current Management Units:** Miscellaneous storage containers 005

00223192	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Tank bottoms from periodic clean out of Preflux tank on galvanizing process.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** PREFLUX TANK BOTTOMS  
**Current Management Units:** Miscellaneous storage containers 005

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
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**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
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\*\*\*\*\* Active Wastes \*\*\*\*\*

00233192	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Tank Bottoms from periodic cleanout of quench tank on galvanizing process. Sludges contain chromium which is not leachable above TCLP characteristic levels.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** QUENCH TANK BOTTOM  
**Current Management Units:** Container storage area 004  
Miscellaneous storage containers 005

00243161	1	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Sulfuric Acid is chilled to precipitate iron and zinc sulfate crystals. Crystals are separated and containerized for disposal  
**Texas Form Code:** 316 Other metal salts/chemicals  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** SULFATE CRYSTALS  
**Current Management Units:** Container storage area 004

00253162	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Acid from the pickling process is chilled to precipitate iron/zinc sulfate crystals. Crystals that cannot be sold as a product are disposed as a waste.  
**Texas Form Code:** 316 Other metal salts/chemicals  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** ACID CRYSTALS  
**Current Management Units:** Container storage area 004

00263102	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** The acid recovery unit(ARU) uses filters to filter the acid and crystals. Once the filters are used they are discarded.  
**Texas Form Code:** 310 Spent solid filters or adsorbents  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** ARU FILTERS  
**Current Management Units:** Sump 003

00273102	2	Active	05/04/2018	On & Off	No	No
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**Description from Generator:** Used filters from baghouse that controls particulate emissions from galvanizing kettle. Waste code replaces 0021 code that was inactivated by TCEQ in Austin.  
**Texas Form Code:** 310 Spent solid filters or adsorbents  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** BAGHOUSE FILTERS  
**Current Management Units:** Container storage area 004  
Miscellaneous storage containers 007 005

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
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**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
***** Active Wastes *****						
00283101	1	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Used filters from baghouse that controls particulate emissions from galvanizing kettle. <b>Texas Form Code:</b> 310 Spent solid filters or adsorbents <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Company's Internal Code(s):</b> BAGHOUSE FILTERS <b>Current Management Units:</b> Container storage area 004 Miscellaneous storage containers 005						
00293102	2	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Used filters from baghouse that controls particulate emissions from galvanizing kettle. <b>Texas Form Code:</b> 310 Spent solid filters or adsorbents <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Company's Internal Code(s):</b> BAGHOUSE FILTERS <b>Current Management Units:</b> Container storage area 004 Miscellaneous storage containers 007 005						
00303101	1	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> The acid recovery unit (ARU) uses filters to filter the acid and crystals. Once the filters are used, they are disposed of. <b>Texas Form Code:</b> 310 Spent solid filters or adsorbents <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Company's Internal Code(s):</b> ARU FILTERS <b>Current Management Units:</b> Sump 003						
0031103H	H	Active	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Spent sulfuric acid from steel pickle operations. Change to code 103 based on 2018 profile renewal with Texas Molecular. <b>Texas Form Code:</b> 103 Spent acid with metals <b>EPA Form Code:</b> W103 Spent concentrated acid <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Source Code:</b> G05 Metal forming and treatment (pickling, heat treating, etc.) <b>NAICS Code:</b> 332812 Metal Coating, Engraving (except Jewelry and Silv <b>Company's Internal Code(s):</b> SPENT SULFURIC ACID <b>EPA Hazardous Waste Numbers:</b> D002 D006 D007 D008 D010 <b>Current Management Units:</b> Tank 006						

As of 05/04/2018, The next unassigned sequence number for WASTES is 0032

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
<b>** No Longer Generated Wastes **</b>						
00013051	1	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Stabilized solids from hot dip galvanizing, pickling tank bottoms chemically tre Waste inactivated due to source reduction. <b>Texas Form Code:</b> 305 "Dry" lime or metal hydroxide solids chemically "fixed" <b>Origin Code:</b> 5 Residual from on-site treatment, disposal or recycling of hazardous waste <b>Current Management Units:</b> None						
00022061	1	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Waste oil generated during equipment and motor oil changes Waste inactivated due to source reduction. Waste inactivated due to rule change. <b>Texas Form Code:</b> 206 Waste oil <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Current Management Units:</b> None						
0003104H	H	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Spent hydrochloric acid from steel pickle operations Waste inactivated dueto product change. <b>Texas Form Code:</b> 104 Spent acid without metals <b>EPA Form Code:</b> W103 Spent concentrated acid <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Source Code:</b> G05 Metal forming and treatment (pickling, heat treating, etc.) <b>NAICS Code:</b> 332812 Metal Coating, Engraving (except Jewelry and Silv <b>EPA Hazardous Waste Numbers:</b> D002 D006 D007 D008 D010 <b>Current Management Units:</b> None						
00041091	1	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Spent sodium hydroxide from cleaning operations; A new hazardous waste determination has been performed on this waste. <b>Texas Form Code:</b> 109 Spent caustic <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Current Management Units:</b> None						
00053041	1	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Molten zinc kettle surface skimmings - zinc oxide, sold for recovery; Material has been excluded from being a solid waste or hazardous waste. <b>Texas Form Code:</b> 304 Other "dry" ash, slag or thermal residue <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Current Management Units:</b> None						
00063191	1	Inactive	05/04/2018	On & Off	No	No
<b>Description from Generator:</b> Molten zinc kettle bottoms removal - dross, sold for recovery; Initial waste code determination used in incorrect form and/or classification code or other mistake. <b>Texas Form Code:</b> 319 Other waste inorganic solids <b>Origin Code:</b> 1 Generated on-site from a product process or service activity <b>Current Management Units:</b> None						

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
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\*\* No Longer Generated Wastes \*\*

0007104H	H	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Spent metal treatment solution - no longer generated Waste inactivated dueto product change.  
**Texas Form Code:** 104 Spent acid without metals  
**EPA Form Code:** W103 Spent concentrated acid  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Source Code:** G05 Metal forming and treatment (pickling, heat treating, etc.)  
**NAICS Code:** 332812 Metal Coating, Engraving (except Jewelry and Silv  
**EPA Hazardous Waste Numbers:** D002  
**Current Management Units:** None

00093101	1	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Spent waste oil filters from motor oil changed Waste inactivated due to rule change.  
**Texas Form Code:** 310 Spent solid filters or adsorbents  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Current Management Units:** None

0011319H	H	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Hydrochloric acid process tank bottoms clean out. Waste inactivated due toproduct change.  
**Texas Form Code:** 319 Other waste inorganic solids  
**EPA Form Code:** W319 Other inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Source Code:** G14 Removal of tank sludge, sediments or slag  
**NAICS Code:** 332812 Metal Coating, Engraving (except Jewelry and Silv  
**EPA Hazardous Waste Numbers:** D002  
**Current Management Units:** None

0014319H	H	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Hydrochloric acid and sulfuric acid process underground sump bottoms clean out. Waste inactivated due to source reduction.  
**Texas Form Code:** 319 Other waste inorganic solids  
**EPA Form Code:** W319 Other inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Source Code:** G14 Removal of tank sludge, sediments or slag  
**NAICS Code:** 332812 Metal Coating, Engraving (except Jewelry and Silv  
**EPA Hazardous Waste Numbers:** D002  
**Current Management Units:** None

00153022	2	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Sludges from galvanizing process are stabilized to neutralize acid and causticsand to bind metal contaminants.  
**Texas Form Code:** 302 Soil contaminated with inorganics only  
**Origin Code:** 5 Residual from on-site treatment, disposal or recycling of hazardous waste  
**Company's Internal Code(s):** STABILIZED SLUDGES  
**Current Management Units:** Miscellaneous storage containers 005

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
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\*\* No Longer Generated Wastes \*\*

00173192	2	Inactive	05/04/2018	On & Off	No	No
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**Description from Generator:** Cake from plate and frame filter press used to filter preflux solution of zinc ammonium chloride.; Initial waste code determination used in incorrect form and/or classification code or other mistake.  
**Texas Form Code:** 319 Other waste inorganic solids  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** PREFLUX FILTER CAKE  
**Current Management Units:** None

00213102	2	Inactive	05/04/2018		No	No
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**Description from Generator:** Used filters from baghouse that controls particulate emissions from galvanizing kettle.  
Waste code inactivated 2/10/16 by audit, found bad lab report.  
**Texas Form Code:** 310 Spent solid filters or adsorbents  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** BAGHOUSE FILTERS  
**Current Management Units:** None

00273102	2	Inactive	05/04/2018		No	No
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**Description from Generator:** Used filters from baghouse that controls particulate emissions from galvanizing kettle. Waste code replaces 0021 code that was inactivated by TCEQ in Austin.; A new hazardous waste determination has been performed on this waste.  
**Texas Form Code:** 310 Spent solid filters or adsorbents  
**Origin Code:** 1 Generated on-site from a product process or service activity  
**Company's Internal Code(s):** BAGHOUSE FILTERS  
**Current Management Units:** Container storage area 004  
Miscellaneous storage containers 007 005

As of 05/04/2018, The next unassigned sequence number for WASTES is 0032

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

\*\*\*\* UNITS AT THIS SITE MANAGING WASTE \*\*\*\*

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
006	Tank	ACTIVE	02/08/2005	H / NA	NA	NA	03 RCRA Permit Exempt<90 Day Storage	YES /
<b>Description from Company:</b>		Spent Acid Storage Tank						
<b>System Types:</b>		141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
<b>Wastes Currently Managed at Unit:</b>		0008104H Spent sulfuric acid from 0031103H Spent sulfuric acid from						
007	Miscellaneous storage containers	ACTIVE	06/21/2010	2 / NA	NA	NA	05 Non-Hazardous Regulated	YES /
<b>Description from Company:</b>		Dumpster used for plant trash.						
<b>System Types:</b>		141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
<b>Wastes Currently Managed at Unit:</b>		00169992 Plant trash from office, 00273102 Used filters from baghouse 00193192 Dust collected from bag 00293102 Used filters from baghouse						
<b>Wastes Previously Managed at Unit:</b>		00213102 Used filters from baghouse 00273102 Used filters from baghouse						
001	Surface impoundment	CLOSED		NA / NA	NA	NA	06	YES /
<b>Description from Company:</b>		125'X 252'X 265'X 12"						
002	Surface impoundment	CLOSED		NA / NA	NA	NA	06	YES /
<b>Description from Company:</b>		395'X 317'X 235'X 36"						
003	Sump	CLOSURE PENDING	02/08/2005	1 / NA	NA	NA	07	YES /
<b>Description from Company:</b>		Wastewater storage						
<b>System Types:</b>		141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
<b>Wastes Currently Managed at Unit:</b>		00263102 The acid hydroxide unit 00303101 The acid recovery unit						
<b>Wastes Previously Managed at Unit:</b>		0003104H Spent hydrochloric acid 00041091 Spent sodium hydroxide 0007104H Spent metal treatment						
004	Container storage area	ACTIVE		1 / NA	NA	NA	06	YES /
<b>Description from Company:</b>		Accumulation Storage Area for Containers						
<b>System Types:</b>		141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
<b>Wastes Currently Managed at Unit:</b>		00233192 Tank Bottoms from 00243161 Sulfuric Acid is chilled to 0012319H Sulfuric acid process tank 00273102 Used filters from baghouse 0013319H Sodium hydroxide process 00103192 Cake from Preflux Filter 00253162 Acid from the pickling 00283101 Used filters from baghouse 00293102 Used filters from baghouse						
<b>Wastes Previously Managed at Unit:</b>		00053041 Molten zinc kettle surface 00063191 Molten zinc kettle bottoms 00093101 Spent waste oil filters from 00273102 Used filters from baghouse 0014319H Hydrochloric acid and 00022061 Waste oil generated during 0011319H Hydrochloric acid process 00041091 Spent sodium hydroxide						



\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
**Notice of Registration**  
**Industrial and Hazardous Waste**

30568 INTERNATIONAL GALVANIZERS

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
005	Miscellaneous storage containers	ACTIVE	06/02/1998	1 / NA	NA	NA	03 RCRA Permit Exempt<90 Day Storage	YES /
<b>Description from Company:</b>		Portable sludge blending roll-off container used to neutralize and stabilize sludges.						
<b>System Types:</b>		110 Stabilization prior to land disposal at another site (encapsulation/stabilization/fixation)						
<b>Wastes Currently Managed at Unit:</b>		0013319H Sodium hydroxide process	00223192 Tank bottoms from periodic	00293102 Used filters from baghouse	00183191 Galvanizing process tanks			
		00203192 Mixed Sludges from	00233192 Tank Bottoms from	0012319H Sulfuric acid process tank	00283101 Used filters from baghouse			
		00273102 Used filters from baghouse	00193192 Dust collected from bag					
<b>Wastes Previously Managed at Unit:</b>		00013051 Stabilized solids from hot	00213102 Used filters from baghouse	00173192 Cake from plate and frame	0014319H Hydrochloric acid and			
		00273102 Used filters from baghouse						

As of 05/04/2018, The next unassigned sequence number for UNITS is 008

## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

## Investigations

Investigation Date	Investigation Type
03/23/2017	Compliance Investigation
08/07/2017	Compliance Invest File Review

## Central Registry

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Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

### Notice of Violations **Current TCEQ Rules**

NOV Date	Status	Citation/Requirement Provision	Allegation	Classification	Self Reporting Indicator
05/25/2017	RESOLVED	40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)	Failure to include full name of inspector and time of inspection on all inspection forms.	MINOR	NO
05/25/2017	RESOLVED	30 TAC Chapter 335, SubChapter A 335.9(a)(1)	Failure to identify waste management units on container storage area inspections.	MINOR	NO
05/25/2017	RESOLVED	30 TAC Chapter 335, SubChapter A 335.9(a)(1)(G)	Failure to document the location of satellite accumulation areas.	MINOR	NO

# Central Registry

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For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

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Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

## Facility Information

**Registration Number:** 30568

**Status:** Active

**Site Name:** INTERNATIONAL GALVANIZERS

**Company Name:** AZZ Inc.

**Site Street Address:** 5898 INDUSTRIAL RD, BEAUMONT, TX, 77705

**Site Location:** 5898 Industrial Rd, Beaumont, TX

**County:** JEFFERSON

**EPA Number:** TXD050293794

**Registration Type:** Generator

**Generator Type:** Industrial

**SIC Code:**

**NAICS Code:** 332812 Metal Coating, Engraving (except Jewelry and

Silv

View Annual Waste Summary [\[2017\]](#) [\[2016\]](#) [\[2015\]](#)

View Waste Receipt Report   **Waste Receipt Report not available**

[View Waste Management Units](#)

[View Waste](#)

## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

[BACK TO:](#) **Facility Information**

<b>Annual Waste Summary For: 2017</b>	
<p><b>Registration Number:</b> 30568  <b>Site Name:</b> INTERNATIONAL GALVANIZERS  <b>Company Name:</b> AZZ Inc.  <b>EPA Number:</b> TXD050293794</p>	

Texas Waste Code	EPA Hazardous Waste No.	Total Quantity Generated	Description		
0008104H	D002, D008, D007, D006	518920 lbs	Spent sulfuric acid from steel pickle operations		
Quantity Handled	Management	Fee Exemption	Facility Number	Receiver's EPA ID	Comment
518920 lbs	134 (Deepwell or underground injection (with or without treatment))	n/a	32299	TXD000719518	

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## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

### [BACK TO:](#) Facility Information

#### Annual Waste Summary For: 2016

**Registration Number:** 30568

**Site Name:** INTERNATIONAL GALVANIZERS

**Company Name:** AZZ Inc.

**EPA Number:** TXD050293794

Texas Waste Code	EPA Hazardous Waste No.	Total Quantity Generated	Description		
0008104H	D002, D006, D007, D008	346480 lbs	Spent sulfuric acid from steel pickle operations		
Quantity Handled	Management	Fee Exemption	Facility Number	Receiver's EPA ID	Comment
346480 lbs	134 (Deepwell or underground injection (with or without treatment))	n/a	32299	TXD000719518	

Texas Waste Code	EPA Hazardous Waste No.	Total Quantity Generated	Description		
00243161		25220 lbs	Sulfuric Acid is chilled to precipitate iron and zinc sulfate crystals. Crystals are separated and containerized for disposal		
Quantity Handled	Management	Fee Exemption	Facility Number	Receiver's EPA ID	Comment
25220 lbs	132 (Landfill or surface impoundment that will be closed as landfill (to include on-site treatment and/or stabilization))	n/a	H2242		

## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

### [BACK TO:](#) Facility Information

#### Annual Waste Summary For: 2015

**Registration Number:** 30568

**Site Name:** INTERNATIONAL GALVANIZERS

**Company Name:** AZZ Inc.

**EPA Number:** TXD050293794

Texas Waste Code	EPA Hazardous Waste No.	Total Quantity Generated	Description		
0008104H	D002, D006, D007, D008	336440 lbs	Spent sulfuric acid from steel pickle operations		
Quantity Handled	Management	Fee Exemption	Facility Number	Receiver's EPA ID	Comment
336440 lbs	134 (Deepwell or underground injection (with or without treatment))	n/a	32299	TXD000719518	

Texas Waste Code	EPA Hazardous Waste No.	Total Quantity Generated	Description		
00243161		1407960 lbs	Sulfuric Acid is chilled to precipitate iron and zinc sulfate crystals. Crystals are separated and containerized for disposal		
Quantity Handled	Management	Fee Exemption	Facility Number	Receiver's EPA ID	Comment
1407960 lbs	132 (Landfill or surface impoundment that will be closed as landfill (to include on-site treatment and/or stabilization))	n/a	H2242		

## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

[BACK TO:](#) **Facility Information**

### IHW Waste Management Units

Sequence Number	Description	Unit Type	Status
<a href="#">001</a>	125'X 252'X 265'X 12"	Surface impoundment	CLOSED
<a href="#">002</a>	395'X 317'X 235'X 36"	Surface impoundment	CLOSED
<a href="#">003</a>	Wastewater storage	Sump	CLOSURE PENDING
<a href="#">004</a>	Accumulation Storage Area for Containers	Container storage area	ACTIVE
<a href="#">005</a>	Portable sludge blending roll-off container used to neutralize and stabilize sludges.	Miscellaneous storage containers	ACTIVE
<a href="#">006</a>	Spent Acid Storage Tank	Tank	ACTIVE
<a href="#">007</a>	Dumpster used for plant trash.	Miscellaneous storage containers	ACTIVE



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  - [RE Search](#)
  - [ID Search](#)
  - [Document Search](#)
  - [Search Results](#)
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- 
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## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 30568**

For: **INTERNATIONAL GALVANIZERS (RN100634120)**

5898 INDUSTRIAL RD, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **F.J. Dean, Inc. (CN600344808)** [View 'Issued To' History](#)

**OPERATOR** [View Compliance History](#)

Mailing Address: 5898 INDUSTRIAL RD BEAUMONT, TX 77705 -6959

Held by: **AZZ Inc. (CN600344816)** [View 'Issued To' History](#)

**OWNER** [View Compliance History](#)

Mailing Address: 1300 S UNIVERSITY DR STE 200 FORT WORTH, TX 76107 -5734

[BACK TO:](#) **Facility Information**

### IHW Waste

Texas Waste Code	Waste Description
<a href="#">00013051</a>	Stabilized solids from hot dip galvanizing, pickling tank bottoms chemically tre Waste inactivated due to source reduction.
<a href="#">00022061</a>	Waste oil generated during equipment and motor oil changes Waste inactivated due to source reduction. Waste inactivated due to rule change.
<a href="#">0003104H</a>	Spent hydrochloric acid from steel pickle operations Waste inactivated dueto product change.
<a href="#">00041091</a>	Spent sodium hydroxide from cleaning operations; A new hazardous waste determination has been performed on this waste.
<a href="#">00053041</a>	Molten zinc kettle surface skimmings - zinc oxide, sold for recovery; Material has been excluded from being a solid waste or hazardous waste.
<a href="#">00063191</a>	Molten zinc kettle bottoms removal - dross, sold for recovery; Initial waste code determination used in incorrect form and/or classification code or other mistake.
<a href="#">0007104H</a>	Spent metal treatment solution - no longer generated Waste inactivated dueto product change.
<a href="#">0008104H</a>	Spent sulfuric acid from steel pickle operations
<a href="#">00093101</a>	Spent waste oil filters from motor oil changed Waste inactivated due to rule change.
<a href="#">00103192</a>	Cake from Preflux Filter Press. Preflux tank solution of zinc ammonium chlorideis circulated through plate and frame filter press to remove particulates. Waste is cake from filter press.

0011319H	Hydrochloric acid process tank bottoms clean out. Waste inactivated due to product change.
0012319H	Sulfuric acid process tank bottoms clean out.
0013319H	Sodium hydroxide process tank bottoms clean out.
0014319H	Hydrochloric acid and sulfuric acid process underground sump bottoms clean out. Waste inactivated due to source reduction.
00153022	Sludges from galvanizing process are stabilized to neutralize acid and caustics and to bind metal contaminants.
00169992	Plant trash from office, break room and plant. Includes paper waste, food waste, waste packaging, and empty containers.
00173192	Cake from plate and frame filter press used to filter preflux solution of zinc ammonium chloride.; Initial waste code determination used in incorrect form and/or classification code or other mistake.
00183191	Galvanizing process tanks are skimmed to remove floating debris. The skims are placed in a container with absorbent to dewater the waste.
00193192	Dust collected from bag house used to control air emissions from galvanizing kettle.
00203192	Mixed Sludges from galvanizing processes after stabilization and dewatering.
00213102	Used filters from baghouse that controls particulate emissions from galvanizing kettle. Waste code inactivated 2/10/16 by audit, found bad lab report.
00223192	Tank bottoms from periodic clean out of Preflux tank on galvanizing process.
00233192	Tank Bottoms from periodic cleanout of quench tank on galvanizing process. Sludges contain chromium which is not leachable above TCLP characteristic levels.
00243161	Sulfuric Acid is chilled to precipitate iron and zinc sulfate crystals. Crystals are separated and containerized for disposal
00253162	Acid from the pickling process is chilled to precipitate iron/zinc sulfate crystals. Crystals that cannot be sold as a product are disposed as a waste.
00263102	The acid recovery unit (ARU) uses filters to filter the acid and crystals. Once the filters are used they are discarded.
00273102	Used filters from baghouse that controls particulate emissions from galvanizing kettle. Waste code replaces 0021 code that was inactivated by TCEQ in Austin.; A new hazardous waste determination has been performed on this waste.
00273102	Used filters from baghouse that controls particulate emissions from galvanizing kettle. Waste code replaces 0021 code that was inactivated by TCEQ in Austin.
00283101	Used filters from baghouse that controls particulate emissions from galvanizing kettle.
00293102	Used filters from baghouse that controls particulate emissions from galvanizing kettle.
00303101	The acid recovery unit (ARU) uses filters to filter the acid and crystals. Once the filters are used, they are disposed of.
0031103H	Spent sulfuric acid from steel pickle operations. Change to code 103 based on 2018 profile renewal with Texas Molecular.

Kathleen Hatnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



CO-IHW-30568

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

October 11, 2004

BOBBY MCKINNEY  
International Galvanizers  
1300 S University Dr  
Ste 200  
Fort Worth, TX 76107-5734

Re: International Galvanizers  
Solid Waste Registration Number: 30568  
Texas Waste Code: 00103192

Dear BOBBY MCKINNEY:

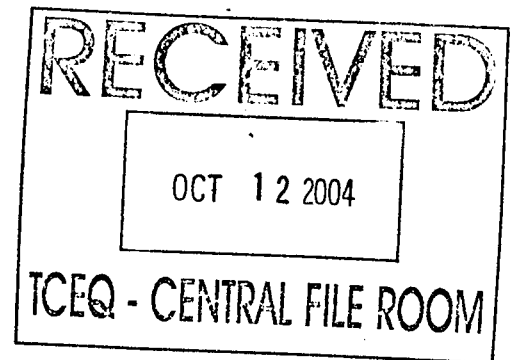
The Texas Commission on Environmental Quality (TCEQ) would like to thank you for your cooperation in our audit process of your facility's classification of the waste stream represented by the Texas waste code 00103192.

The TCEQ has completed its audit and finds no reason to request additional information at this time. If you have any questions regarding this review, please do not hesitate to contact me at (512) 239-6412.

Sincerely,

Jesse Boultinghouse, Chemist  
I&HW Permits Section, MC 130  
Waste Permits Division

cc: TCEQ Region 10 Office, Beaumont, Texas



March 31, 2004

Scott Green  
I & HW Permits Section, MC-130  
TCEQ  
PO Box 13087  
Austin, TX 87811-3087

RECEIVED  
TNRCC IHW PERMITS  
APR 12 2004  
WASTE PERMITS DIVISION

RE: SUR# 30568, International Galvanizers

Dear Mr. Green:

I am responding to your letter of February 2, 2004 to our subsidiary, International Galvanizers. Your letter requested verifications of the classification of waste code 0010 3192.

The waste code is assigned to a waste generated by the filtration of a process fluid. The process fluid is a water mixture with about 30% zinc ammonium chloride and pH of about 5. The waste is not a listed waste as per 40 CFR 261.31. A laboratory test showed that the waste was not characteristically hazardous as per 40 CFR 261.24. The attached documentation provides more information on the rationale for classification.

If you have further questions, please call me at 817-810-0095.

Sincerely,

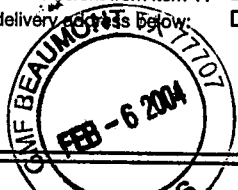
  
Frank Gaudet, PE  
Corporate Environmental Engineer

attachments

cc: Bobby McKinney

**RECEIVED**  
APR 20 2004  
TCEQ - CENTRAL FILE ROOM

DUE DATE 6/11/2004 DOC# 4050  
WWC# \_\_\_\_\_  
P.M. Boultinghouse  
TEAM  1  2  OIC

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)	B. Date of Delivery
1. Article Addressed to:	C. Signature X <i>Louis Higgins</i>	
IHW/WAT 30568-00103192-A International Galvanizers Inc Attn: Tony Phillips PO Box 21677 Beaumont, TX 77720	D. Is delivery address different from item 1? If YES, enter delivery address below: <div style="text-align: center;">  </div>	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Copy from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 1999    Domestic Return Receipt    102595-00-M-0952		

ICIG - CENTRAL LIFE

# **AZZ incorporated**

## *Memorandum*

---

**DATE:** 03/27/2003

**TO:** Files: INTERNATIONAL GALANIZERS

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** Cake from Preflux Filter Press Waste Number 0010 319 2

---

### **Process**

The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are laid in the yard area while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next the pieces are dipped into an acid tank for rust removal (pickling). Another acid tank is used for removing the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The quench tank contains a dilute solution of chromic acid to place a seal on the galvanized piece. The galvanized pieces are stored outside on the south side of the plant while they await pick-up by the customer.

The solution in the 10,730 gallon preflux tank is circulated through a plate and frame filter press to remove particulates that formed in the solution. The filter press is piped to the preflux tank and a diaphragm pump circulates the solution.

03/27/03

## **Chemicals**

The preflux solution is a dilute mixture of zinc ammonium chloride (3% w/w) and has a pH of about 4 and is heated to 150-180°F. The solution is susceptible to the formation of a ferric hydroxide precipitant when iron from the work piece dissolves and mixes with oxygen in the water. In addition the tank can be treated with barium chloride to remove sulfates from the solutions. Dirt can also fall into the solution because the tanks are open top.

## **Waste Generation**

The plate and frame press filters the particulates from the preflux solution. The press is periodically opened and the dewatered cake is removed from the press. This cake is the waste stream.

## **Waste Classification**

A laboratory analysis of the waste shows that it is non-hazardous for TCLP metals (See attached laboratory report dated 3/21/03). Other characteristic constituents were not analyzed because knowledge of the process indicates that organic pollutants are not present in the waste. This waste is not a listed waste because it does not match the descriptions in 40 CFR 261.30-261.33.

The waste is classified as Class 2 following the TCEQ checklist for waste classification.

## **Waste Disposal**

The filter cake is removed from the press and placed into either a 55 gallon drum, a 1 cubic yard bag or a roll-off container. The waste is disposed off-site either by sending the containers to a non-haz landfill or by mixing the cake with other non-haz or hazardous waste sludges generated at the facility. The mixed wastes are placed in a roll-off container, neutralized, stabilized and de-watered using chemicals that bind the leachable metal pollutants and adsorb the water, or are sent to a TSDF facility for stabilization.

## **Attachments:**

1. Waste Classification Checklist
2. Process Flow Schematic
3. Laboratory Analysis-Chemtex Lab 3-21-03

# WASTE CLASSIFICATION CHECKLIST

Generator: International Galvanizers, Inc

Name of Waste: CAKE FROM PREFLUX FILTER PRESS Waste Code Number: 0010 319 2

## Part I. Hazardous Waste Determination

IF the answer to any of the questions in Part I is "Yes", THEN the waste is hazardous.

### Part I-A. Listed Hazardous Waste Determination

The EPA lists some 400 hazardous wastes.

#### Information to Help You Make This Determination

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31-33. These wastes are often referred to as follows:

- "F" listed waste (waste from nonspecific sources, Section 361.31;
- "K" listed waste (wastes from specific sources, Section 261.32;
- "P" listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33;
- "U" listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33.

QUESTION: Is the waste a listed hazardous waste, or is it mixed with or derived from one?

Yes  No

---

### Part I-B. Characteristic Hazardous Waste Determination

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

#### Information to Help You Make This Determination

##### Ignitability

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24% alcohol by volume) that have a closed-cup flash point less than 60° C (140° F).
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

QUESTION: Is the waste ignitable per 40 CFR §261.21?

Yes  No

##### Corrosiveness

Wastes that are hazardous because they are corrosive include the following:

- Aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- Liquid wastes that corrode steel at a rate rather than 6.35 mm (0.250 inches) per year.

QUESTION: Is the waste corrosive per 40 CFR Section 261.22?

Yes  No

##### Reactivity

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction
  - ✓ At standard temperature and pressure,
  - ✓ If subjected to a strong ignition source, or



✓ If heated under confinement.

- When mixed with water, it is
  - ✓ Potentially explosive,
  - ✓ Reacts violently, or
  - ✓ Generates toxic gases or vapors.
  
- If a cyanide or sulfide-bearing waste is exposed to pH conditions between 2 and 12.5, it can generate enough toxic gases, vapors, or fumes to present a danger to human health or the environment. Generally, if a waste generates 250 ppm or more of reactive cyanides or 500 ppm or more of reactive sulfides, it is considered a reactive waste. (It should be noted that these levels of reactive compounds are just guidance. Each waste must be evaluated for reactivity on a case-by-case basis).
  
- It is normally unstable and readily undergoes violent change without detonating.
  
- It is a forbidden explosive (as defined in 49 CFR 173.51 or a Class A explosive as defined in 49 CFR 173.53).
  
- It is a Class B explosive (see 49 CFR 173.88).

**QUESTION:** Is the waste reactive according to 40 CFR §261.23?

Yes No

### Toxicity

A waste is toxic if the toxicity characteristic leaching procedure (TCLP) shows that a representative sample from the waste contains one or more constituents at or above the levels listed in the Table below:

arsenic.....	5.0 mg/l	1, 4-dichlorobenzene.....	7.5 mg/l	nitrobenzene.....	2.0 mg/l
barium.....	100.0 mg/l	1, 2-dichloroethane .....	0.5 mg/l	pentachlorophenol.....	100.0 mg/l
benzene .....	0.5 mg/l	1, 1-dichloroethylene .....	0.7 mg/l	pyridine.....	5.0 mg/l
cadmium.....	1.0 mg/l	2, 4-dinitrotoluene .....	0.13 mg/l	selenium.....	1.0 mg/l
carbon tetrachloride ..	0.5 mg/l	endrin.....	0.02 mg/l	silver .....	5.0 mg/l
chlordan.....	0.03 mg/l	heptachlor (and its expoxide)....	0.008 mg/l	tetrachloroethylene.....	0.7 mg/l
chlorobenzene.....	100.0 mg/l	hexachlorobenzene.....	0.13 mg/l	toxaphene.....	0.5 mg/l
chloroform .....	6.0 mg/l	hexachlorobutadiene .....	0.5 mg/l	trichloroethylene .....	0.5 mg/l
chromium.....	5.0 mg/l	hexachloroethane .....	3.0 mg/l	2, 4, 5-trichlorophenol ...	400.0 mg/l
o-cresol .....	200.0 mg/l	lead.....	5.0 mg/l	2, 4, 6-trichlorophenol ...	2.0 mg/l
m-cresol .....	200.0 mg/l	lindane .....	0.4 mg/l	2,4,5-TP (Silvex).....	1.0 mg/l
p-cresol .....	200.0 mg/l	mercury .....	0.2 mg/l	vinyl chloride.....	0.2 mg/l
cresol.....	200.0 mg/l	methoxychlor .....	10.0 mg/l		
2, 4-D.....	10.0 mg/l	methyl ethyl ketone.....	200.0 mg/l		

**QUESTION:** Is the waste toxic according to CFR Section 261.24?

Yes No

## Review of Checklist Part I – Hazardous Waste

**IF** the answer to any of the preceding questions is Part I is “Yes”,  
**THEN** the waste is HAZARDOUS.

**IF** the answers are “No” to all the preceding questions,  
**AND** the waste is NON-INDUSTRIAL,  
**THEN** STOP here.

**IF** the answers are “No” to all of the preceding questions,  
**AND** the waste is INDUSTRIAL,  
**THEN** PROCEED to Part II.

---

## Part II. Nonhazardous Industrial Waste Classes 1 and 2

The determination in this part of the checklist applies only to nonhazardous industrial waste. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505-06 and 335.508).

**IF** the answer to any of the **un-numbered** questions in this part of the checklist is “Yes,”  
**THEN** the nonhazardous industrial waste is Class 1 waste.

**IF** all the answers to the **un-numbered** questions in this part are “No,”  
**THEN** the industrial waste is a Class 2 waste.

### Generator’s Self-Classification

**QUESTION:** Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?

Yes No

### Container Waste

**IF** the waste is a container, greater than 5 gallons in holding capacity, which has held  
✓ a hazardous substance (as defined in 40 CFR Part 302)  
✓ a hazardous waste (including acutely hazardous wastes),  
✓ a Class 1 waste, and/or  
✓ a material that would be classified as a hazardous or Class 1 waste if disposed of,

**THEN** answer questions 1 and 2. (Please note that containers that have held acutely hazardous wastes must be triple rinsed before they can be classified as empty.)

**IF** these conditions are not present in your situation,  
**THEN** proceed to the next un-numbered question.

(1) Has the container had all its residues removed? Yes No

(2) Has the container been rendered unusable? Yes No

**QUESTION:** Are any of the answers to questions (1) or (2) above “NO”?

Yes No

### Regulated Asbestos-Containing Material (RACM)

**QUESTION:** Does the waste contain asbestos material identified as (RACM) as defined in 40 CFR Part 61?

Yes No

### Polychlorinated Biphenyls (PCBs)

**QUESTION:** Is the waste contaminated by a material that originally contained 50 ppm or more of

total PCBs?

Yes  No

**QUESTION:** Does the waste contain 50 or more ppm PCBs?

Yes  No

**Petroleum Substance Waste**

(1) Is your waste specifically identified as a petroleum substance or contaminated with a material identified as a petroleum substance?  Yes  No

(2) Does the waste contain more than 1500 ppm total petroleum hydrocarbons (TPH)?  Yes  No

**QUESTION:** Are the answers to **BOTH** of the numbered questions above "Yes"? (If one, or both, of the answers are "No", enter "No" for this question.)

Yes  No

**"New Chemical Substance"**

**QUESTION:** Is the waste from the production of a "new chemical substance," as defined by the federal Toxic Substances Control Act, 15 U.S.C.A. Section 2602(9)?

Yes  No

**Out-of-State Origin**

**QUESTION:** Is the waste generated outside the state of Texas?

Yes  No

**Constituent Levels and Specified Properties for Nonhazardous Industrial Class 1 Wastes**

**QUESTION:** If the waste is a liquid, does it have a flash point of less than 65.6°C (150° F)?\*

Yes  No

**QUESTION:** Is the waste a solid or semi-solid that – under conditions normally encountered in storage, transportation, and disposal –

■ is liable to cause fires through friction or through retained heat from manufacturing or processing; or

■ can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Yes  No

**QUESTION:** Is the waste a semi-solid that, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution with a pH of 2 or less or 12.5 or more? (*Exception:* for solidified, stabilized, encapsulated, or otherwise chemically bound wastes, an exception is provided in 30 TAC Section 335.505(3))\*

Yes  No

**QUESTION:** Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)? The table below contains a partial list.

Yes  No

arsenic.....	1.0 mg/l	lead.....	5.0 mg/l
barium.....	100.0 mg/l	selenium.....	1.0 mg/l
benzene.....	0.5 mg/l	silver.....	5.0 mg/l
cadmium.....	0.5 mg/l	tetrachloroethylene.....	0.7 mg/l
chromium.....	5.0 mg/l	trichloroethylene.....	0.5 mg/l

A satisfactory demonstration includes the results from the analysis of the waste for the specific constituent by a laboratory using an appropriate method.

**Lack of Class 2 or 3 Information**

**QUESTION:** Is information lacking which demonstrates that the belongs in Class 2 or 3?

Yes  No

**Review of Checklist Part II:**

**Class 1 or 2 Nonhazardous Industrial Waste**

IF the answer to any of the preceding un-numbered questions in Part II is "Yes",

the nonhazardous, industrial waste is a Class 1 waste.

IF the answers are "No" to all the preceding **un-numbered** questions in Part II,  
the industrial waste is a Class 2 waste.

IF the answers are "No" to *all* of the preceding **un-numbered** questions in Part II  
AND the industrial generator wishes to evaluate the waste for a possible Class 3 classification,  
THEN PROCEED to Part III.

---

## PART III. Nonhazardous Industrial Class 3 Waste

This part of the checklist applies only to nonhazardous, industrial waste that does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste. (The corresponding regulations for this part of the checklist can be found at 30 TAC Sections 335.507 and 335.508.)

### Part III-A. Initial Determinations for Class 3 Status

IF the answer to any of the following questions in Part III-A is "Yes",  
THEN the nonhazardous, industrial waste *cannot* be considered a Class 3 waste.

#### Containers

QUESTION: Is the waste an empty container?  Yes  No

#### Medical Waste

QUESTION: Is the waste a medical waste regulated under the 30 AC Chapter 330 Subchapter Y?  Yes  No

#### Distilled Water Leaching Test

QUESTION: When submitted to the 7-Day Distilled water leaching test, does the waste leach constituents at or above the maximum contaminant levels of 30 TAC Chapter 335, Subchapter R?  Yes  No

#### Toxicity Characteristic Leaching Procedure

QUESTION: When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels?  Yes  No

*Exclusion:* Excluded from this list of Class 1 toxic constituents are those addressed in the previous question.

#### Petroleum Hydrocarbons

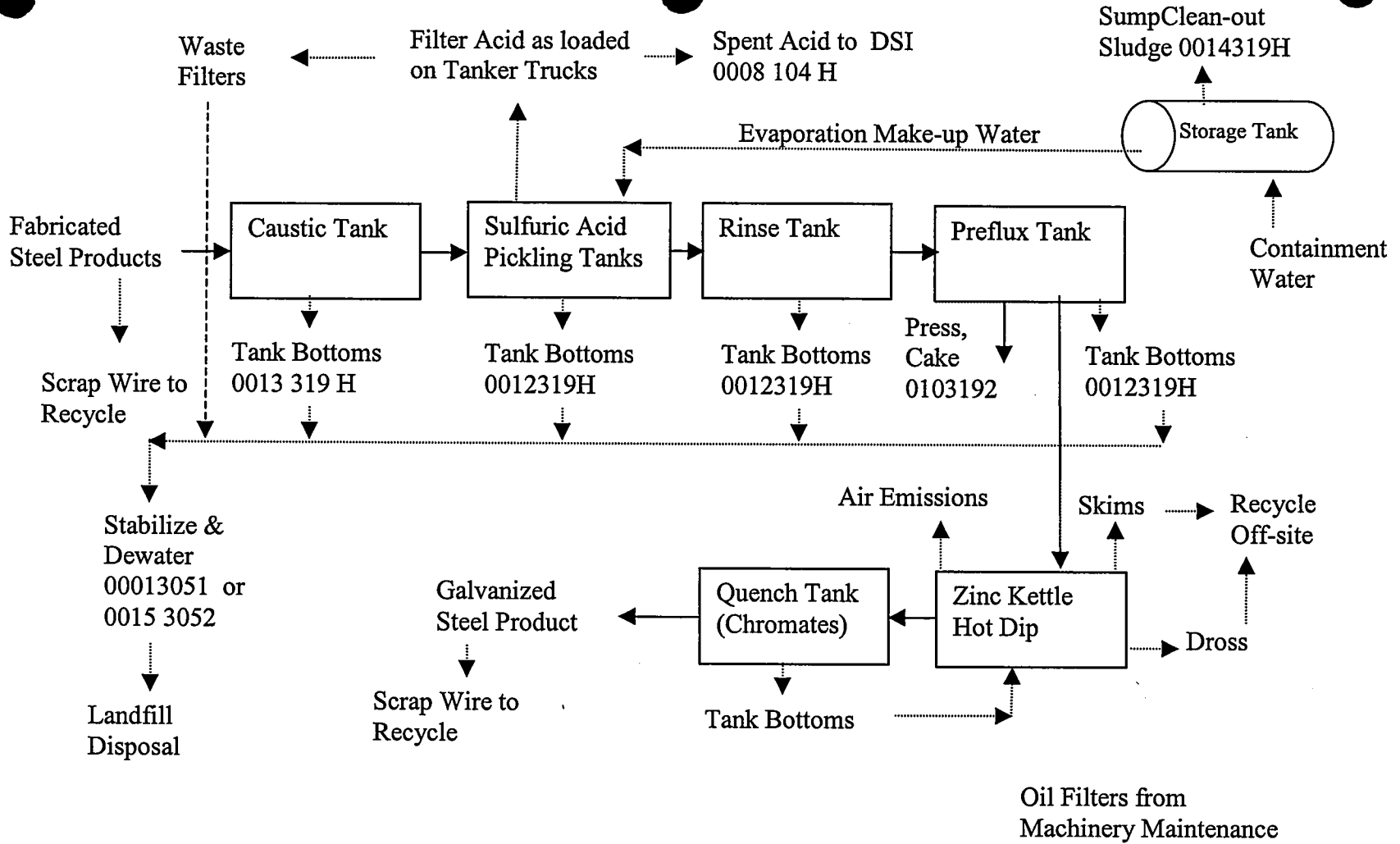
QUESTION: Does the waste contain detectable levels of petroleum hydrocarbons (Method 1005)?  Yes  No

#### Polychlorinated Biphenyls (PCBs)

QUESTION: Does the waste contain detectable levels of PCBs?  Yes  No

#### Decomposition

QUESTION: Is the waste readily decomposable?  Yes  No



**PRODUCTION PROCESS AND WASTES GENERATED  
INTERNATIONAL GALVANIZERS**

Client: International Galvanizer  
P. O. Box 21677  
Beaumont, TX 77720

Report Date: 03/21/03  
Sample Matrix: Sludge  
Date Collected: 03/18/03  
Time Collected: 8:45am  
Collected By: Tony Phillips  
Date Analyzed: 03/20/03  
Analyst(s): KW  
Date Received: 03/18/03  
Time Received: 3:00pm  
CHEMTEK FILE #: P3030624

Attn: Mr. Tony Phillips

RESULTS OF ANALYSIS

Site Location: 5898 Industrial Rd., Beaumont, TX 77705

Sample Identification: Perflux Sludge

CHEMTEK #: P3030624

TOXICITY CHARACTERISTICS LEACHING PROCEDURE CONSTITUENTS

EPA HW#	CAS #	Constituents	Units	Results	MDL	RMCLL	EPA Method
<u>TCLP Metals</u>							
D004	7440-38-2	Arsenic	mg/l	< 0.05	0.05	5	1311/6010B
D005	7440-39-3	Barium	mg/l	0.4	0.2	100.0	1311/6010B
D006	7440-43-9	Cadmium	mg/l	< 0.05	0.05	1	1311/6010B
D007	7440-47-3	Chromium	mg/l	< 0.05	0.05	5	1311/6010B
D008	7439-92-1	Lead	mg/l	< 0.05	0.05	5	1311/6010B
D009	7440-97-5	Mercury	mg/l	< 0.02	0.02	0.2	1311/7470A
D010	7782-49-2	Selenium	mg/l	< 0.05	0.05	1	1311/6010B
D011	7440-22-4	Silver	mg/l	< 0.05	0.05	5	1311/6010B

MDL: Method Detection Limit.

RMCLL: Regulatory Maximum Concentration of Contaminants in the TCLP Leachate.

LABORATORY CONTROL MATRIX SPIKE RECOVERY

EPA HW#	CAS #	Constituents	(%) Recovery
<u>TCLP Metals:</u>			
D004	7440-38-2	Arsenic	105
D005	7439-39-3	Barium	84
D006	7440-43-9	Cadmium	106
D007	7440-47-3	Chromium	110
D008	7439-92-1	Lead	108
D009	7440-97-5	Mercury	90
D010	7782-49-2	Selenium	107
D011	7440-22-4	Silver	99

*KCR Reddy*

for \_\_\_\_\_  
Dr. C. N. Reddy, Ph.D., CIH, ASP  
Director

jlm/CNR

The analytical results, estimates or interpretations contained in this report are based on information and material supplied by the client for whom analysis and certification was done. The analytical results, estimates or interpretations are based on the best judgment of CHEMTEK, however, under no circumstances shall CHEMTEK be held responsible for any errors or omissions, or for any consequences arising from the use of this report. This report shall not be reproduced, in whole or in part, without express approval of CHEMTEK.

## CHAIN OF CUSTODY RECORD

### ENVIRONMENTAL ANALYTICAL SERVICES REQUEST

3082 25<sup>th</sup> Street, Port Arthur, TX 77642

Phone #: (409) 981-4575; Fax #: (409) 981-1522

e-mail: chemtexpa@es.com

Phone #: 409-842-0216  
Fax #: 409-842-5016

<b>CLIENT:</b> International Galvanizers <b>ATTN:</b> Mr. Tony Phillips	<b>ADDRESS:</b> P.O. Box 21677 Beaumont, TX 77720		<b>PHONE #:</b> 409-842-0216 <b>FAX #:</b> 409-842-5016
<b>BILLING CONTACT/ADDRESS:</b> (if different from above)	<b>P. O. #:</b>	<b>PROJECT NO:</b>	<b>PROJECT:</b>

**SITE/LOCATION:**  
5898 INDUSTRIAL RD.  
BEAUMONT, TX 77705

<b>SAMPLE(S) COLLECTED BY:</b> <u>Tony Phillips</u>	<b>Expected Turnaround Time</b> 2-4 hr Rush _____ 24 hr Rush _____ 1-2 days <input checked="" type="checkbox"/> 3-5 days _____ 5-7 days _____ 7-14 days _____		
--	---	--	--

CHEMTEX #	SAMPLE IDENTIFICATION	COLLECTION		Sample Container	Preservative	TCLP Metals	REQUESTED ANALYSES												
		Date	Time				No.	Size (oz.)	Type (Glass/Plastic)										
93030624	Reflux Sludge	3/18/03	8:45	SI	G	X													

**Special Remarks:** Samples must be preserved on ice after sample collection and transported in ice chest.

<b>Relinquished By:</b> <u>[Signature]</u>	<b>Date/Time:</b> 3/18/03 2:30 PM	<b>Received By:</b> <u>[Signature]</u>	<b>Date/Time:</b> 3/18/03 2:30 PM
<b>Relinquished By:</b> <u>[Signature]</u>	<b>Date/Time:</b> 3/18/03 3:00 PM	<b>Received By:</b> <u>[Signature]</u>	<b>Date/Time:</b> 3/18/03 3:00 PM

Original Metal Wet Chemical, Biological and Petrochemical Analysis for Metal Media  
Environmental and Industrial Hygiene Samples

Facilities are also available at:  
5144 Logans Street, Corpus Christi, Texas 78418  
136 S. Citrus Service Hwy., Sulphur, Louisiana 70665

(361) 299-9900 FAX (361) 299-1155

e-mail: chemtexpa@es.com  
e-mail: chemtexpa@es.com

MAR 24 '03 07:34 FR INTERNATIONAL GILVANI 409 842 5016 TO 18173364211 P.03/03 52:21:03.12 AM

Kathleen Harnett White, *Chairman*  
R. B. Ralph Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Margaret Hoffman, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 2, 2004

Tony Phillips  
International Galvanizers  
PO Box 21677  
Beaumont, TX 77720

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
30568-00103192-A

Re: International Galvanizers  
Solid Waste Registration Number: 30568  
Texas Waste Code: 00103192

Dear Tony Phillips:

In order to better protect the environment of Texas, The Texas Commission on Environmental Quality (TCEQ) randomly performs audits on waste stream notifications, specifically the proper waste classification. The waste stream identified by the Texas waste code 00103192 has been chosen for such a review.

The TCEQ requests that your facility submit all information and rationale that was used in classifying this waste. This submittal must be provided to the Technical Analysis staff and to the TCEQ Region 10 Office within 10 days of your receipt of this letter. In the submittal, please reference the following number:

30568-00103192-A

For your review, we have enclosed a handout regarding waste classification documentation.

If you have any questions regarding this letter or the review process, please contact a member of the Technical Analysis staff at (512) 239-6412.

Sincerely,

*M. Scott Green*

Scott Green  
ISHW Permits Section, MC-130  
Waste Permits Division

Enclosure

cc: TCEQ Region 10 Office, Beaumont, Texas



- dates of sample collection
- description of the site and/or unit from which the sample was taken, including sampling locations
- the method of sampling and equipment used for sampling
- a description of the sampling techniques, including collection, containerization, and preservation
- rationale for the sampling plan (why does the number, type and location of samples taken accurately represent the waste stream being characterized)

- Chain of Custody

- Analytical Data

- analytical results with quality control data, this includes at a minimum when applicable; spike recoveries (matrix, blank, method, etc.), duplicates, blanks, continuing calibration samples, interference check samples, and laboratory specific recovery and % RPD for the constituents and methods.
- identification of analytical methods, (including any preparatory methods)
- identification of detection limits
- identification of the laboratory performing the analytical analysis
- documentation which satisfactorily demonstrates that lower levels of quantitation are not possible (This is only necessary when a nonhazardous waste is being evaluated against the Class 1 criteria and matrix interferences of the waste causes the Practical Quantitation Limit (POL) of a Class 1 toxic constituent (Appendix 1, Table 1- Appendix B of this guideline) to be greater than the Maximum Concentration Listed.)

### Part III. Classification Checklist

The classification checklist (which can be found in TNRCC Publication Number RG-22) can be used as a guideline in the classification of industrial waste and hazardous waste. A completed checklist submitted for an audit does not represent sufficient documentation. When utilizing the Checklist in waste classification, a generator should support a response ("yes" or "no") by analytical data and/or process knowledge. (A generator must be able to demonstrate why an answer "yes" or "no" appears on the checklist for a particular question.)

*For example,* a generator answers "no" to the question "Is the waste ignitable per 40 CFR §261.21." The generator can support this response by submitting either analytical data and/or process knowledge. If process knowledge is used, it must be specific. A general statement such as "The waste is not ignitable." would not be sufficient. If, however, the generator (1) reviews all constituents that may be present in the waste; (2) determines that each constituent which comprises the waste does not meet the definition of an ignitable waste; and (3) determines that the process that generated the waste does not introduce any ignitable characteristics to the stream, the generator would be able to document more specific process knowledge that supports a "no" response. Additionally, a generator would need to keep copies of the information that demonstrates all the constituents in the waste stream would not cause the waste to exhibit the characteristic of ignitability.

For a copy of RG-22, please call TNRCC Publications at (512) 239-0028 or download from <http://bume.tnrc.state.tx.us/waste/ihw/weval/pub.html>.

### Part IV. Summary

Generators should keep in mind that documentation should demonstrate why a waste has been designated a particular classification. A good rule of thumb is if anyone can review a generator's classification documentation, using the published criteria and/or the checklist, and arrive at the same classification as the generator, then the generator has probably done a good job of compiling supporting documentation for a waste. If someone other than the generator has reviewed the classification of a waste, and still has some unanswered questions, the generator may want to conduct some additional work on gathering documentation

# WASTE CLASSIFICATION DOCUMENTATION REQUIREMENTS

April 1, 1999

## Part I. Introduction

The TNRCC randomly audits a portion of waste stream notifications in order to ensure proper classification and coding of waste in Texas. When a generator receives a request for information for the purpose of an audit, the information that a generator has gathered to classify and code his waste stream must be submitted to the TNRCC. The following information may assist you in gathering the analytical data, quality control data, sample documentation and/or process knowledge that may be used in classifying and coding a waste stream.

## Part II. Hazardous Waste Determination

The first step in the waste classification process is the hazardous waste determination. To demonstrate that a waste is not a hazardous waste it is necessary to demonstrate that the waste: 1) is not a listed hazardous waste as defined in 40 Code of Federal Regulations (CFR) Part 261, Subpart D and 2) not a characteristically hazardous waste as defined in 40 Code of Federal Regulations Part 261, Subpart C. Documentation used to support the hazardous waste determination is described below:

### Process Knowledge

If process knowledge is utilized in the classification of a waste, that process knowledge must be documented and maintained. (Please note that process knowledge must be maintained in some type of written or electronic storage format. It can not be stored solely in someone's mind.) The process knowledge must support a generator's rationale as to why the waste has been designated a particular classification. It must also support the generator's rationale as to why a particular test method was not performed, limiting the amount of analytical testing required.

The following are examples of process knowledge which may assist in waste classification determinations.

- Material Safety Data Sheets (MSDSs) (Please note that not all MSDSs contain information on all constituents found in a product. MSDSs were not created for the purpose of Texas waste classification determinations. They may be a helpful tool in determining what could be in the waste, but cannot be used for determining what is not in the waste.)
- manufacturer's literature
- identification of chemicals/materials involved in the waste stream generation process (including any potential break down products)
- full description of waste stream generation activities
- identification of potential contaminants
- other documentation generated in conjunction with a particular process
- preliminary testing results

### Analytical Data

When process knowledge does not sufficiently support a particular classification, analytical data described in this part must be documented. If a generator utilizes analytical data to classify a waste, it must be supported by Quality Control Data and Sample Documentation information. This part outlines information that must be maintained when analytical data is utilized for classification purposes.

- Sampling Procedures

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Margaret Hoffman, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 2, 2004

Tony Phillips  
International Galvanizers  
PO Box 21677  
Beaumont, TX 77720

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
30568-00103192-A

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Texas Waste Code: 00103192

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The TCEQ requests that your facility submit all information and rationale that was used in classifying this waste. This submittal must be provided to the Technical Analysis staff and to the TCEQ Region 10 Office within 10 days of your receipt of this letter. In the submittal, please reference the following number:

30568-00103192-A

For your review, we have enclosed a handout regarding waste classification documentation.

If you have any questions regarding this letter or the review process, please contact a member of the Technical Analysis staff at (512) 239-6412.

Sincerely,

*M. Scott Green*

Scott Green  
I&HW Permits Section, MC-130  
Waste Permits Division

Enclosure

cc: TCEQ Region 10 Office, Beaumont, Texas

# INDUSTRIAL WASTE CLASSIFICATION CHECK-SHEET

TNRCC Solid Waste Registration Number:

3 0 5 6 9

Texas Waste Code:

0 0 1 0 3 1 9 2

Waste Description:

PROCESS FLUID

Description of Process which Generates the Waste:

FILTRATION OF A

PROCESS FLUID

**Part A. HAZARDOUS WASTE DETERMINATION** to be performed by all generators of waste (taken from 40 Code of Federal Regulations (CFR) Part 261)

If the answer to any of the following questions in this Part is "yes", then the waste is hazardous. If the waste is hazardous it can not be classified as a non-hazardous waste. **IF IT IS A HAZARDOUS WASTE, YOU NEED NOT PROCEED TO PART B.**

D E T E R M I N A T I O N	Status	Method Used
Is the waste a listed hazardous waste (F,K,P,U listed), mixed with listed hazardous waste, or derived from a listed hazardous waste per 40 CFR §261.31, §261.32, and §261.33?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste ignitable per 40 CFR §261.21?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste corrosive per 40 CFR §261.22?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste reactive per 40 CFR §261.23?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste toxic per 40 CFR §261.24?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input checked="" type="checkbox"/> Analytical <input type="checkbox"/> Others

If the answers are "NO" to all of the preceding questions and the waste is an industrial waste, proceed to the nonhazardous determination. If the waste is non-industrial, Stop here.

**Part B. CLASS 1 & Class 2 WASTE DETERMINATION** *applicable to nonhazardous, industrial waste only - (taken from 30 Texas Administrative Code (TAC) Section (§) 335.505 and §335.508)*

If the answer to any of the following non-numbered questions in this Part is "yes", then the non-hazardous waste is a Class 1 waste. If all the answers to the following non-numbered questions in this Part are "no", then the waste can be considered a Class 2 waste.

<p>Has the generator chosen to classify his non-hazardous waste as a Class 1 waste?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Are any of the answers to questions (1) or (2) below "NO"?</p> <p><i>If the waste is a container, greater than 5 gallons in holding capacity, which has held a Hazardous Substance (as defined in 40 CFR Part 302), a hazardous waste, a Class 1 waste, and/or a material which would be classified as a hazardous or Class 1 waste if disposed, answer questions (1) and (2). If not, proceed to the next non-numbered question.</i></p> <p>(1) Has the container had all its residues removed?</p> <p>(2) Has the container been rendered unusable?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Does the waste contain asbestos material identified as Regulated Asbestos Containing Material (RACM) as defined in 40 CFR Part 61?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Is the waste contaminated by a material which originally contained greater than or equal to 50 parts per million total polychlorinated biphenyls (PCBs)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Does the waste contain greater than or equal to 50 ppm PCBs?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Does the waste contain greater than 1500 ppm total petroleum hydrocarbons (TPH) by TNRCC 1005 Method?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
<p>Is the waste from the production of a "new chemical substance" (as defined by the federal Toxic Substances Control Act, 15 U.S.C.A §2602(9))?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

If the waste is a liquid, does it have a flash point of less than 65.6 degrees Celsius (150 degrees F)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a solid or semi-solid which, under conditions normally incident to storage, transportation, and disposal, is liable to cause fires through friction, retained heat from manufacturing or processing, or which can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a semi-solid or solid which, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution having a pH less than or equal to 2 or greater than or equal to 12.5?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input checked="" type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Process Knowledge <input checked="" type="checkbox"/> Analytical <input type="checkbox"/> Others

For a list of Class 1 toxic constituents and their regulatory limit, please see 30 Texas Administrative Code (TAC) 335, Table 1 Appendix of Subchapter R.

**Part C. CLASS 3 WASTE DETERMINATION** - applicable to nonhazardous industrial waste which does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste - (taken from 30 TAC §335.507 and §335.508)

N/A

If the answer to any of the following questions is "YES", then the non-hazardous, industrial waste can <u>not</u> be considered a Class 3 waste.		
Is the waste essentially insoluble**?  ** Please note that "if the waste is liquid, then it <u>cannot</u> be a Class 3 industrial waste."	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste an empty container?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste a medical waste regulated under the 30 TAC Chapter 330 Subchapter Y?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
When submitted to the 7-Day Distilled Water Leachate Test, does the waste leach constituents at or above the Maximum Contaminant Levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), do the waste leach Class 1 toxic constituents* listed in Table 1, Appendix 1 of Subchapter R at or above their detection levels?  * Excluded from this list of Class 1 toxic constituents are those constituents which are addressed in the previous question (ie. constituents identified in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste contain petroleum hydrocarbons (Method: TNRCC 1005)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Does the waste contain polychlorinated biphenyls (PCBs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
Is the waste readily decomposable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others

If all the answers to the preceding questions are "NO", proceed to the next question to continue the Class 3 evaluation.

Is the waste inert? (Inertness refers to chemical inactivity of an element, compound, or a waste.)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Process Knowledge <input type="checkbox"/> Analytical <input type="checkbox"/> Others
--	---	--

If all the answers to the questions in Part C.1. are "NO", and all the answers to the questions in Part C.2. are "YES", then the non-hazardous waste can be considered a Class 3 waste.

IF YOU USE THIS CHECK-SHEET TO SUPPORT YOUR WASTE'S CLASSIFICATION, BE SURE TO ATTACH COPIES OF ALL THE INFORMATION YOU USED IN ANSWERING THE QUESTIONS. Examples of such information might include, but is not limited to, the following: process knowledge, material safety data sheets, analytical results, an explanation of why any samples taken are representative of the waste, and "chain of custodies" for any samples taken.

Reviewed By: <u>JL/B</u>	Completion Date: <u>04-14-2007</u>
Status: <input checked="" type="checkbox"/> OK <input type="checkbox"/> INACTIVE <input type="checkbox"/> PENDING <input type="checkbox"/> NO ACTION REQUIRED	COMMENTS:

# Analytical Review Checklist

ANALYTICAL QA/QC CHECKSHEET		Any comments
Chain of Custody complete and signed	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Date Sx taken	03/18/2003	
Date Sx Extracted	03/19/2003	
Date Sx Analyzed	03/19/2004	Any Hold Times exceeded: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Sx Preserved and Containerized Properly	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	See SW-846, Chapter 2, hold time between sampling & extraction, hold time between extraction and analytical test
Appropriate Extraction Procedure	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Appropriate Analytical Procedure	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Calibration Curve; Linear, 2nd order or 3rd Order:	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Detection Limits OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Interference Check sample (ICP only)	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Laboratory Control Samples	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Check Standards; Calibration still OK	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Duplicate Sx OK, if duplicates and spike are wrong, then data is invalid	Yes <input type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Spike Recovery OK	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Surrogate Recovery OK	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Check Laboratory Numbers and make sure they are at least what are set by EPA for the method type
Are Field Blanks Non-detect	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Are Method Blanks Non-detect	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Precision: Relative Percent Difference (for Duplicates)

$$\frac{(Sx_1 - Sx_{1dup})}{(Sx_1 + Sx_{1dup})/2} \times 100$$

Accuracy: Percent recovery (Spikes)

$$\frac{\text{Spike } Sx - \text{Unspiked } Sx}{\text{Amount Spiked}} \times 100$$

AA = Atomic Absorption  
ICP = Inductively coupled plasma



WST IHW/ REPORTS  
1st ID: 30568 Vol: 001 Date: 10/7/1999  
BBC: 50420802  
IBC: 369425



IHW  
SWR # 30568 RP  
CAS # 6029  
PROJ. MGR Musick

*Date 2/18/2000*

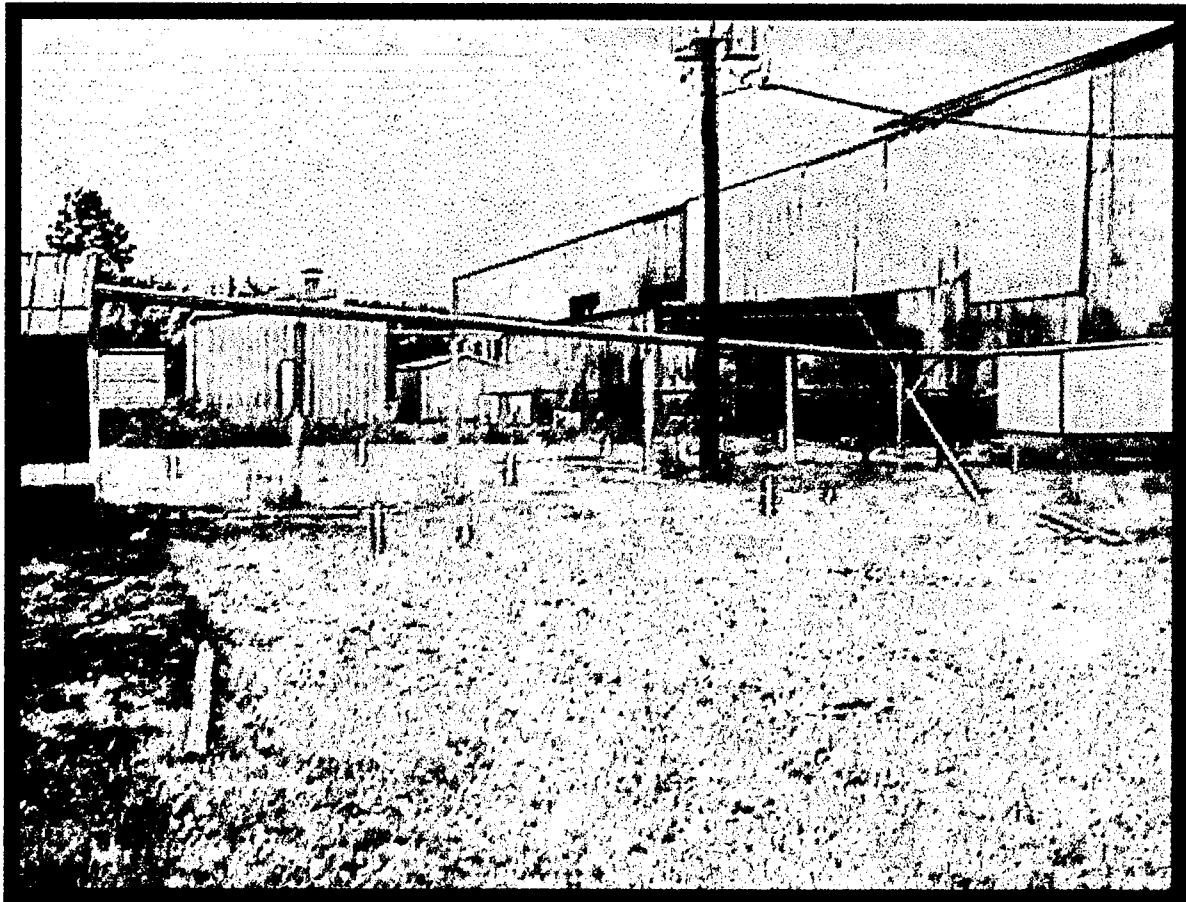
# INTERNATIONAL GALVANIZING, INC.

Beaumont, Texas

## WASTE SULFURIC AND HYDROCHLORIC ACID EMERGENCY SUMP FILL LINE AREA FINAL CLEAN-UP REPORT

TCEQ CENTRAL RECORDS  
369425

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TCEQ - CENTRAL FILE ROOM



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OCT 07 1999  
REMEDIATION DIVISION  
Corrective Action Section

TXD050293794

SWR# 30568

CAS# 4029  
PROJ. MGR. Musick

# INTERNATIONAL GALVANIZING, INC.

Beaumont, Texas

## WASTE SULFURIC AND HYDROCHLORIC ACID EMERGENCY SUMP FILL LINE AREA FINAL CLEAN-UP REPORT

Prepared By:

**Paul Hamilton**

and

**Richard C. Allison Ph.D.**

**ENVIRONMENTAL MANAGEMENT  
SERVICES**

P.O. Box 739

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October 15, 1998

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REMEDIATION DIVISION  
Corrective Action Section

## SUMMARY

Environmental Management Services (EMS) removed some contaminated soil from an area adjacent to the underground emergency accumulation sump fill line, that had become contaminated with some low percentage sulfuric and hydrochloric acid containing small amounts of cadmium, chromium, lead and zinc metals.

The facility is situated approximately eight miles west of Beaumont along Interstate Highway 10 West, near Smith Road. More specifically, south of Interstate Highway 10 at 5898 Industrial Road.

The sump is primarily used as an emergency holding tank in the case of a process acid tank leak or spill. When a leaky process tank leak was discovered, the process acid gravity flowed from the process tank containment area into the sump. After the process tank was repaired, the acid was pumped from the sump back into the process tank using fire hoses. Over time, leaks occurred in the fire hoses resulting in soil contamination. In recent years, the fire hoses were incased in an eight inch CPVC containment pipe preventing any future soil contamination.

On November 1, 1996 we collected a total of ten soil cores used to determine the initial extent of soil contamination. Nine cores were positioned along the length of the sump fill line. The tenth, a background soil core was spotted in the inactive portion of the facility across the street. The initial investigation soil cores sampling depths ranged from the surface to a maximum depth of five feet. The ten soil cores were identified as A through J. Each individual soil sample identification was accomplished using the A - J naming sequence, as well as by adding a two character sequence representing the soil sample depth, such as, SS, for surface samples, 1.5, for the one and one-half to two foot samples, 3.0, for the three to three and one-half foot samples, and 5.0, for the five to five and one half foot depth. An example of a proper sample identification would be, D 1.5, (D - Core at one and one-half to two foot level).

All of the initial investigation soil samples collected were analyzed for Total Cadmium, Total Zinc, Total Chromium, Total Lead, and pH.

Relative to the group of surface soil sample results, (BSS, ESS and ISS) demonstrated high levels of zinc contamination and lower pH values. BSS and ISS also showed small amounts of Chromium and Lead.

With respect to the set of one and one half foot sample results, B 1.5, C 1.5, D 1.5, F 1.5, G 1.5, H 1.5, and I 1.5, showed high levels of Zinc, with C 1.5, D 1.5, F 1.5, G 1.5, H 1.5, and I 1.5 also reflecting lower pH values. In addition, F 1.5, also revealed a fair spike for Cadmium, C 1.5 and F 1.5 showed some Chromium, while, F 1.5 and H 1.5 confirmed some lead levels.

The three foot level samples showed that core locations C 3.0 and I 3.0 demonstrated significant levels of Zinc as well as C 3.0 showed a drop in the pH. At the five foot level, I 5.0 reflected a small amount of Zinc and a lower pH value.

Relative to the initial investigation soil samples laboratory analysis results, EMS marked off an area approximately twenty-five feet by twenty-five feet around each core exhibiting metal concentrations greater than the background levels. EMS excavated to a depth of two foot around cores B, D, F, G, and H. At the same time EMS excavated to a depth of four foot around core C and to a six foot depth around core I.

After the initial soil excavation activity, on December 8, 1997, EMS collected twenty-two soil samples, fifteen wall samples and seven floor samples, at the newly excavated soil interface. The wall samples were identified as W 1- W15 and the floor samples were identified as F 1 - F 7. The collected soil samples were analyzed for Total Cadmium, Total Zinc, Total Chromium, Total Lead, and pH.

Many of the December 8th sample results reflected levels near or below background. However, the wall samples W6, W7, W8, W9, W10, W11, W12, W15, and floor samples F4 and F6, had Total Zinc values greater than background. In addition, W15 also had Total Cadmium, Total Chromium and Total Lead concentrations above the background parameters.

Based on the December 8th laboratory analysis results, EMS extended the initial excavation area boundaries to the east approximately twenty feet from the wall samples W 6, W 7, W 8 and W 9, to the north approximately ten feet of wall samples W 10, W 11, W 12 and finally to the west approximately twenty feet from wall sample W 15.

On December 15, 1997, EMS had an additional ten soil samples collected, eight wall samples and two floor samples, at the new over-excavated soil interface. The wall samples were identified as OEW 1- OEW 8 and the floor samples were identified as OEF 1 & OEF 2. Wall samples OEW 1 and OEW 2 were analyzed for Total

Cadmium, Total Zinc, Total Chromium, Total Lead, and pH while the remaining eight samples were analyzed for only Total Zinc and pH.

The majority of the December 15th sample results showed levels consistent with background, with the exception of wall samples OEW 3, OEW 4, and OEW 5, which had Total Zinc values greater than background.

Once the December 15th soil sample results demonstrated some zinc contamination along the northern edge of the excavation area, EMS decided to perform some additional soil coring and sampling prior to any future excavation. EMS had approached a point where further excavation would impact the soil cover over the underground accumulation sump.

On December 18, 1997 EMS had a total of ten soil samples collected around the remaining three undisturbed sides of the sump house. The samples were taken from the one and one-half to two foot levels. Since previous excavation and analysis demonstrated the only contaminant appearing in this area was zinc, EMS performed only Total Zinc and pH analysis on the ten new soil core samples.

All of the December 18, 1997, soil core samples results exhibited some degree of Total Zinc contamination.

Since the additional ten soil cores and samples reflected Total Zinc concentrations significantly greater than background levels, it was decided it would be best to halt any further soil excavation and just deed record the undisturbed metal contaminated area above the underground sump.

EMS obtained approval to dispose of the excavation spoils at the Browning Ferris Industries Beaumont Class II landfill facility. On April 30, 1998 a total of 560 cubic yards of soil were transported by Ramco Trucking, Vidor, Texas, to the BFI Beaumont Facility.

All of the excavation holes were backfilled and compacted with a clean sand - clay mixture brought in from an off-site sand pit location.

**WASTE SULFURIC AND HYDROCHLORIC ACID EMERGENCY  
SUMP FILL LINE AREA FINAL CLEAN-UP REPORT  
CERTIFICATION/SIGNATURE SHEET**

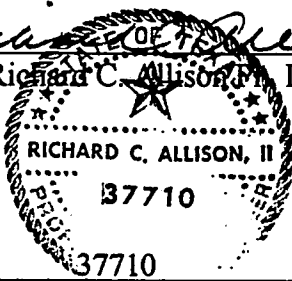
This Waste Sulfuric and Hydrochloric Acid Emergency Sump Fill Line Area Final Clean-Up Report prepared for International Galvanizers, Inc. was produced by Environmental Management Services.

For Environmental Management Services:

10/15/98  
Date

*Paul Hamilton*  
Paul Hamilton, President

10/15/98  
Date

*Richard C. Allison, II*  
Richard C. Allison, II, P.E.  
  
Texas Registration Number

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## **OBJECTIVE**

Environmental Management Services (EMS) removed some contaminated soil from an area adjacent to the underground emergency accumulation sump fill line that had become contaminated with some low percentage sulfuric and hydrochloric acid containing small amounts of cadmium, chromium, lead and zinc metals. The emergency accumulation sump was used as a spill containment back-up system in case of a process acid tank leak or spill. Sulfuric and hydrochloric acid contamination would sometimes occur during the transfer of the acid from the sump back to the repaired process tank.

## **FACILITY OPERATIONS**

International Galvanizers, Inc., utilizes the Hot Dip Galvanizing process to protect fabricated steel products from corrosion. The basic galvanizing process consists first, of cleaning the steel by submerging the fabricated steel product in a fifteen to twenty percent solution of sodium hydroxide. Second, the steel is pickled in a ten to fifteen percent sulfuric acid solution. The third step is to dip the steel in a approximately three percent hydrochloric acid solution. The final step is to coat the steel with a thin layer of molten zinc. The flowchart found in Attachment Number 1, *Hot Dip Zinc Galvanizing Process Flowchart*, will provide a better understanding of the facility's industrial process operations.

## **FACILITY LOCATION AND LAYOUT**

The facility is situated approximately eight miles west of Beaumont along Interstate Highway 10 West, near Smith Road. More specifically, south of Interstate Highway 10 at 5898 Industrial Road. Located in Attachment Number 2, is a topographical map better reflecting the facility location.

The active portion of the facility is located on the north side of Industrial Road, while the inactive part except parking along the street, is to the south. The drawing in Attachment Number 3, *General Facility Layout*, will provide a better understanding of the general facility layout.

## **SUMP FILL LINE CONTAMINATION ACTIVITY**

Typically, the waste acid is disposed off site using vacuum trucks by removing the waste directly from the process tanks. The sump is primarily used as an emergency holding tank in the case of a process acid tank leak or spill. When a leaky process tank was discovered, the process tank acid gravity flowed from the process tank

containment area into the emergency accumulation sump. After the process tank was repaired, the acid was pumped from the emergency accumulation sump back into the process tank using fire hoses. Over time, leaks occurred in the fire hoses resulting in minor soil contamination. In recent years, the fire hoses were incased in an eight inch CPVC containment pipe preventing any future soil contamination.

The drawing found in Attachment Number 4, *Sump Fill Line and Contamination Area*, will provide a better understanding of the soil contamination area of concern.

### **SUMP AREA INITIAL SOIL CONTAMINATION CORING AND SAMPLING INVESTIGATION**

On November 1, 1996 samples obtained from a total of ten soil cores were used to determine the initial extent of soil contamination. Nine cores were positioned along the length of the sump fill line. The tenth, a background soil core was spotted in the inactive portion of the facility across the street. The ten soil cores were identified as A through J. Attachment Number 5, *A - I Soil Core Locations*, will provide a better understanding of the initial soil cores and sampling locations.

#### **Soil Sampling Depths**

The soil cores sample depths ranged from the surface to a maximum depth of five feet. The four cores, B, E, I, and J were sampled at the surface. The three cores B, I, and J were also sampled at the five to five and one half foot depths. All of the soil cores were sampled at the one and one-half to two foot level. The seven cores, B, C, F, G, H, I, and J were sampled at the three to three and one-half foot sample depths.

#### **Soil Sample Identification**

Each individual soil sample identification was accomplished using the A - J naming sequence, as well as by adding a two character sequence representing the soil sample depth, such as, *SS*, for surface samples, *1.5*, for the one and one-half to two foot samples, *3.0*, for the three to three and one-half foot samples, and *5.0*, for the five to five and one half foot depth. An example of a proper sample identification would be, *D 1.5*, (D - Core at one and one-half to two foot level). Digital Photographs, Figure 1, *Contaminated Area Soil Core Locations Northeast View*, and Figure 2, *Contaminated Area Soil Core Locations Northwest View*, found in Attachment Number 6, will provide a visual of the area core locations.

### Soil Sampling Method

A rubber tire skid loader with a six inch auger was used to core the holes to the appropriate sample depths. Once the auger chips were removed from the hole, a sample was ascertained by driving a two inch diameter split spoon sampler into the soil. The spoon sampler soil plugs were then retrieved, and placed in a five hundred milliliter laboratory grade glass sample jar with a Teflon lined lid. The sample jar was marked with the proper identification, and placed in an ice chest for shipment to the laboratory. The spoon sampler was washed, decontaminated and rinsed before the next sample retrieval process. Figure 3, *Split Spoon Sampler* and Figure 4, *Split Spoon Sampler Decontamination Equipment*, in Attachment Number 6, will provide a visual of the equipment used.

### LABORATORY ANALYSIS PARAMETERS

The soil samples collected on November 1, 1996, were analyzed for Total Cadmium, Total Zinc, Total Chromium, Total Lead, and pH. The laboratory analysis were performed by Intertek Services, Inc., 11555 South Main, Houston, Texas.

### BACKGROUND SAMPLES LABORATORY ANALYSIS RESULTS

All of the sample laboratory analysis results were compared against their respective background level results. The background sample levels for all four depths were averaged. Table 1, Mean Background Levels, provides information on the individual and averaged background levels.

**Table 1. Mean Background Values**  
Values are in milligrams / kilogram mg/Kg

	Background Surface Sample	Background 1.5 Foot Sample	Background 3.0 Foot Sample	Background 5.0 Foot Sample	Background Average Value
Total Cadmium	0.11	0.26	0.02	0.06	0.1125
Total Chromium	20.5	16.5	15.2	11	15.8
Total Lead	49	15	9.2	21.5	23.675
Total Zinc	113	35.9	19.3	19.8	47
pH	5.7	5.1	5.8	6.5	5.775

## CORES A THROUGH J SAMPLES LABORATORY ANALYSIS RESULTS

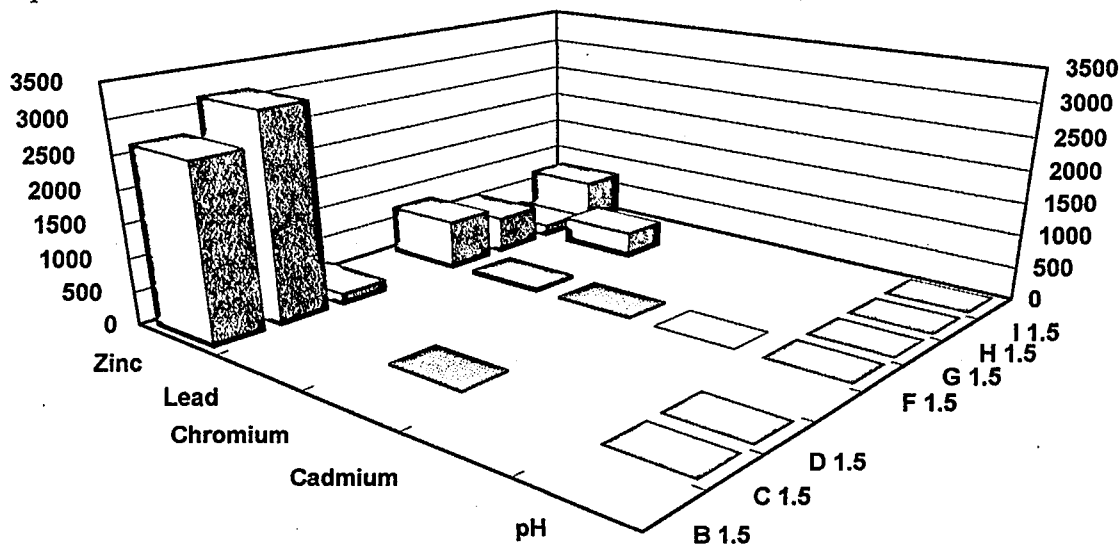
Each soil sample result was compared against its respective depth and mean background value. Table 2, page 5, Soil Sample Result Comparisons Surface and 1.5 Foot Levels, is a condensed table for which both the surface and the one and one-half foot sample results are compared against their respective Backgrounds. Table 3, page 6, Soil Sample Result Comparisons 3.0 and 5.0 Foot Levels, addresses result comparisons for the three and five foot levels. Values found in the tables highlighted in red print, represent significantly higher levels of a contaminant greater than the mean background value.

### Surface Soil Sample Results

Relative to the group of surface soil sample results, BSS, ESS and ISS demonstrated high levels of zinc contamination and lower pH values. BSS and ISS also showed small amounts of Chromium and Lead.

### One and One-Half Foot Sample Results

With respect to the set of one and one half foot sample results, B 1.5, C 1.5, D 1.5, F 1.5, G 1.5, H 1.5, and I 1.5, showed high levels of Zinc, with C 1.5, D 1.5, F 1.5, G 1.5, H 1.5, and I 1.5 also reflecting lower pH values. In addition, F 1.5, also revealed a fair spike for Cadmium, C 1.5 and F 1.5 showed some Chromium, while, F 1.5 and H 1.5 confirmed some lead levels. Graph A, provides more information on the one and one-half foot core contaminants verses depth.



**Graph A, One and One-Half Foot Level Contaminants Greater Than Background Verses Locations**

Table 2. Initial Investigation Soil Samples Result Comparisons  
(Surface and One & One-Half Foot Levels)

Values are in milligrams / kilogram mg/Kg

~~Surface Soil Samples~~ Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.26		16.5		15		35.9		5.1
BSS	0.31	0.05	59	42.5	114	99	2270	2234.1	2.5	-2.6
ESS	0.19	-0.07	14	-2.5	33	18	1180	1144.1	2.8	-2.3
ISS	0.25	-0.01	13.6	-2.9	66	51	736	700.1	4.1	-1
JSS (Background)	0.26	0	16.5	0	15	0	35.9	0	5.1	0

~~Subsurface Soil~~ Samples Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.11		20.5		49		113		5.7
A 1.5	0.07	-0.04	16.6	-3.9	17.6	-31.4	63.5	-49.5	5.3	-0.4
B 1.5	0.03	-0.08	18	-2.5	14.9	-34.1	2710	2597	5.4	-0.3
C 1.5	0.3	0.19	43.6	23.1	40	-9	3190	3077	4.2	-1.5
D 1.5	0.03	-0.08	15.2	-5.3	14.1	-34.9	227	114	4.6	-0.8
E 1.5	0.04	-0.07	17.7	-2.8	14.1	-34.9	97.2	-15.8	5.2	-0.2
F 1.5	5.5	3.9	49.8	29.3	84	35	814	701	3.7	-1.7
G 1.5	0.03	-0.08	23.8	3.3	35	-14	619	506	3.7	-1.7
H 1.5	0.03	-0.08	25.9	5.4	430	367	232	119	3.2	-2.2
I 1.5	0.11	0	23.5	3	18.9	-30.1	768	635	3.9	-1.5
JSS (Background)	0.11	0	20.5	0	49	0	113	0	5.7	0

Values in red represent results substantially greater than background levels.



**Table 3. Initial Investigation Soil Samples Result Comparisons  
(Three and Five Foot Levels)**

~~3.0 Foot Depth Soil Samples~~ Results Compared To Background Levels

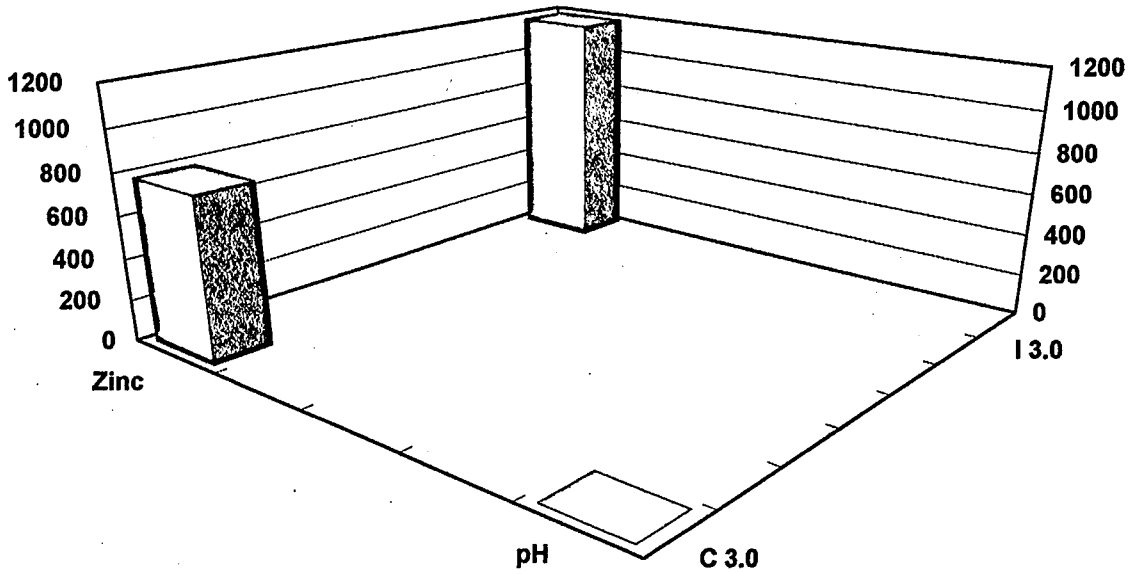
Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.02		15.2		9.2		19.3		5.8
B 3.0	0.02	0	19.9	4.7	10.7	1.5	23.9	4.6	6.6	0.8
C 3.0	0.02	0	17.5	2.3	11.8	2.6	828	808.7	3.9	-1.9
F 3.0	0.02	0	19.1	3.9	10.9	1.7	25.7	6.4	5.3	-0.5
G 3.0	0.02	0	14.8	-0.4	11.8	2.6	20.2	0.9	5.5	-0.3
H 3.0	0.02	0	21.6	6.4	11.7	2.5	29.3	10	5.2	-0.6
I 3.0	0.54	0.52	17.2	2	34	24.8	1230	1210.7	5.2	-0.6
JSS (Background)	0.02	0	15.2	0	9.2	0	19.3	0	5.8	0

~~5.0 Foot Depth Soil Samples~~ Results Compared To Background Levels

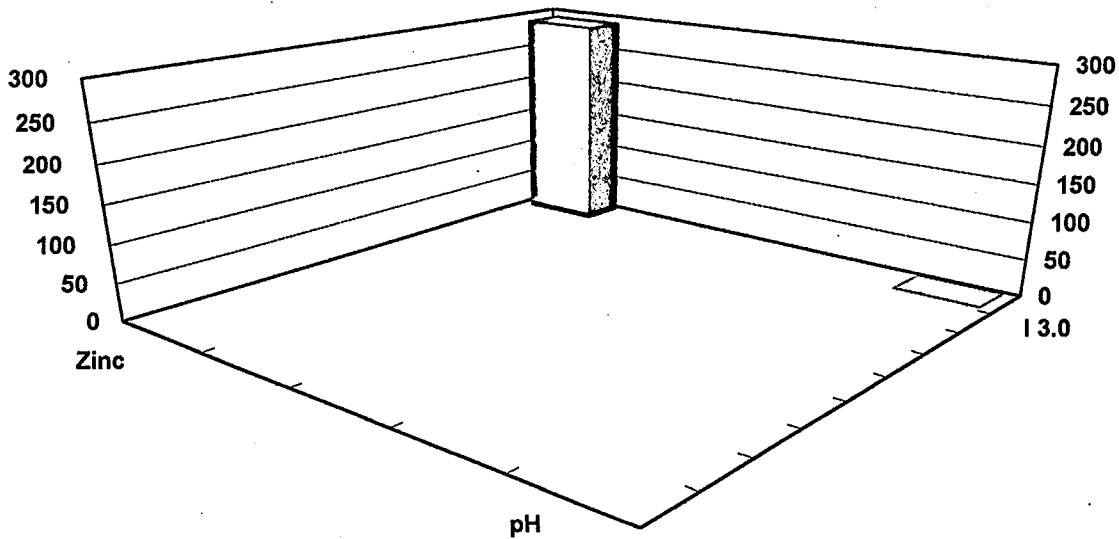
Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.06		11		21.5		19.8		6.5
B 5.0	0.02	-0.04	17.6	6.6	11.3	-10.2	29.8	10	6.4	-0.1
I 5.0	0.04	-0.02	27	16	44	22.5	339	319.2	4.8	-1.7
JSS (Background)	0.06	0	11	0	21.5	0	19.8	0	6.5	0

**Three and Five Foot Soil Sample Results**

The three foot level samples showed that core locations C 3.0 and I 3.0 demonstrated significant levels of Zinc as well as C 3.0 showed a drop in the pH. At the five foot level, I 5.0 reflected a small amount of Zinc and a lower pH value. Graph B, shows diagram information on the three foot core contaminants verses depth while, Graph C, reveals information on the five foot core contaminant verses depth.



**Graph B, Three Foot Level Contaminants Greater Than Background Verses Locations**



**Graph C, Five Foot Level Contaminant Greater Than Background Verses Locations**

### *Initial Investigation Laboratory Analysis Reports*

Copies of the November 1, 1996, initial investigation ten cores soil samples laboratory analysis reports are located in Attachment Number 7.

### *CONTAMINATED AREA EXCAVATION ACTIVITY*

#### *First Soil Contamination Area Excavation Conducted On December 5-7, 1997*

Relative to the initial investigation soil samples laboratory analysis results, EMS marked off an area approximately twenty-five feet by twenty-five feet around each core exhibiting metal concentrations greater than the background levels. EMS excavated to a depth of two foot around cores B, D, F, G, and H. At the same time EMS excavated to a depth of four foot around core C and to a six foot depth around core I. The drawing *Required Excavation Areas*, located in Attachment Number 8, will aid in better understanding the initial cores excavation areas and required excavation depths. Figure 5, *Initial Excavation December 5-7, 1997 Core Areas B, C, D, & F*, Figure 6, *Initial Excavation December 5-7, 1997 Core Areas B, C, D, F, & H*, and Figure 7, and *Initial Excavation December 5-7, 1997 Core Area I*, found in Attachment Number 6, will provide a visual of the initial excavation activity.

#### *Exposed Excavation Holes Protection Between Activities*

The excavation holes remained covered and protected with six millimeter plastic during periods between site excavation activity, soil sampling, laboratory analysis results and over-excavation or hole backfilling and compaction. Figure 8, *Excavation Hole Protective Covers*, located in Attachment Number 6, will provide a visual of the protective covers over the holes.

#### *Soil Sampling And Laboratory Analysis After December 5-7, 1997 Excavation*

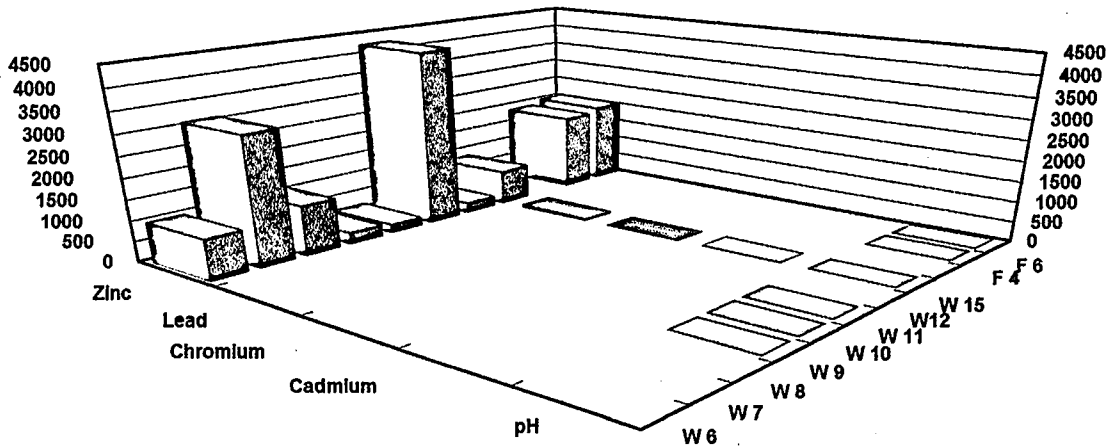
After the initial soil excavation activity, on December 8, 1997, EMS had twenty-two soil samples collected, fifteen wall samples and seven floor samples, at the newly excavated soil interface. The wall samples were identified as W 1 - W15 and the floor samples were identified as F 1 - F 7. The drawing *December 8, 1997 Excavation Floor and Wall Soil Sample Locations*, Attachment Number 9, furnishes more data on the sampling locations.

The newly excavated soil interface samples were collected and analyzed by Chemtex Environmental and Industrial Hygiene Services personnel, located at

3082 25th Street, Port Arthur, Texas 77642. The collected soil samples were analyzed for Total Cadmium, Total Zinc, Total Chromium, Total Lead, and pH. Figure 9, *Chemtex Laboratory Technician Collecting Soil Sample*, in Attachment Number 6, will provide a visual of the sampling at one location.

**December 8, 1997 Soil Wall And Floor Samples Laboratory Analysis Results**

Many of the December 8th sample results reflected levels near or below background. However, the wall samples W6, W7, W8, W9, W10, W11, W12, W15, and floor samples F4 and F6, had Total Zinc values greater than background. In addition, W15 also had Total Cadmium, Total Chromium and Total Lead concentrations above the background parameters. Table 4, page 10, *December 8, 1997, Laboratory Analysis Results* provides information on all of the laboratory analysis results. The drawing *December 8, 1997, Sample Results Greater Than Backgrounds* found in Attachment Number 10, demonstrates the location of sample results greater than background. Copies of the December 8th laboratory analysis reports are located in Attachment Number 11. Graph D, reflects soil samples results which had greater than background amounts.



**Graph D, December 8, 1997, Soil Samples Greater Than Backgrounds**

**Contaminated Soil Area Over-Excavation Conducted On December 12-14, 1997**

Based on the December 8th laboratory analysis results, EMS extended the initial excavation area boundaries to the east approximately twenty feet from the wall samples W 6, W 7, W 8 and W 9, to the north approximately ten feet of wall samples W 10, W 11, W 12 and finally to the west approximately twenty feet from wall sample W 15. Attachment Number 12, *December 12-14, 1997*

Table 4. December 8, 1997 Excavation Soil Samples Result Comparisons

Values are in milligrams / kilogram mg/Kg

Wall (W 1 - W 15) Soil Samples Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.1126		16.8		23.675		47		5.775
W 1	< 0.25	0.1375	8.00	-8.50	8.00	-15.68	33.00	-14.00	7.13	1.38
W 2	< 0.25	0.1375	7.00	-9.50	4.00	-19.68	15.00	-32.00	4.90	-0.88
W 3	< 0.25	0.1375	8.00	-8.50	8.00	-15.68	10.00	-37.00	6.18	0.40
W 4	< 0.25	0.1375	9.00	-6.80	30.00	6.33	24.00	-23.00	5.12	-0.66
W 5	< 3.00	2.8875	7.00	-8.80	7.00	-16.68	27.00	-20.00	5.46	-0.32
W 6	< 3.00	2.8875	8.00	-7.80	8.00	-15.68	1050.00	1003.00	5.52	-0.26
W 7	< 3.00	2.8875	8.00	-7.80	10.00	-13.68	3150.00	3103.00	5.52	-0.26
W 8	< 3.00	2.8875	9.00	-6.80	10.00	-13.68	1275.00	1228.00	5.15	-0.63
W 9	< 3.00	2.8875	25.00	9.20	3.00	-20.68	330.00	283.00	3.67	-2.11
W 10	< 3.00	2.8875	20.00	4.20	6.00	-17.68	260.00	213.00	3.47	-2.31
W 11	< 3.00	2.8875	8.00	-7.80	28.00	4.33	4300.00	4253.00	4.61	-1.17
W 12	< 3.00	2.8875	7.00	-8.80	15.00	-8.68	295.00	248.00	5.93	0.15
W 13	< 0.25	0.1375	3.00	-12.80	3.00	-20.68	8.00	-39.00	5.93	0.15
W 14	< 0.25	0.1375	6.00	-9.80	15.00	-8.68	11.00	-36.00	6.41	0.64
W 15	9.00	8.8875	30.00	14.20	75.00	51.33	899.00	852.00	3.73	-2.05

Floor (F 1 - F 7) Soil Samples Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.1126		-15.80		-23.68		47.00		-5.78
F 1	< 0.25	0.1375	9	-6.80	12	-11.68	32	-15.00	4.9	-0.88
F 2	< 0.25	0.1375	3	-12.80	3	-20.68	6	-41.00	5.87	0.09
F 3	< 0.25	0.1375	9	-6.80	7	-16.68	8	-39.00	5.78	0.00
F 4	< 3.00	2.8875	9	-6.80	6	-17.68	1950	1903.00	4.68	-1.10
F 5	< 0.25	0.1375	9	-6.80	10	-13.68	10	-37.00	5.47	-0.31
F 6	< 3.00	2.8875	9	-6.80	10	-13.68	2075	2028.00	4.22	-1.56
F 7	< 0.25	0.1375	3	-12.80	7	-16.68	8	-39.00	6.59	0.82

Values in red represent results substantially greater than background levels.

*Over-Excavation Area*, provides a better information on the expanded over-excavation area. Figure 10, *Over-Excavation Area Staked Off* and Figure 11, and *Over-Excavation Area Ready for Sampling*, located in Attachment Number 6, will provide a visual of the initial excavation activity.

#### **Soil Sampling And Laboratory Analysis After December 12-14,1997 Excavation**

On December 15, 1997, EMS had an additional ten soil samples collected, eight wall samples and two floor samples, at the new over-excavated soil interface. The wall samples were identified as OEW 1- OEW 8 and the floor samples were identified as OEF 1 & OEF 2. The drawing *December 15, 1997 Soil Sample Locations*, in Attachment Number 13, furnishes more information on the over-excavation soil sample locations.

The newly over-excavated soil interface samples were again collected and analyzed by Chemtex Environmental and Industrial Hygiene Services personnel. Wall samples OEW 1 and OEW 2 were analyzed for Total Cadmium, Total Zinc, Total Chromium, Total Lead, and pH while the remaining eight samples were analyzed for only Total Zinc and pH. Figure 12, *Chemtex Laboratory Technician Collecting Over-Excavation Soil Sample*, and Figure 13, *Sample Identification and Preparation for Shipment* located in Attachment Number 6, will provide a visual of the sampling at one location.

#### **December 15, 1997 Over-Excavation Soil Samples Laboratory Analysis Results**

The majority of the December 15th sample results showed levels consistent with background, with the exception of wall samples OEW 3, OEW 4, and OEW 5, which had Total Zinc values greater than background. Table 5, page 12, *December 15, 1997, Laboratory Analysis Results* provides information on all of the laboratory analysis results.

Graph E page 13, reflects soil samples results which had greater than background amounts. The drawing *December 15, 1997, Sample Results Greater Than Backgrounds* found in Attachment Number 14, demonstrates the location of sample results greater than background. Copies of the December 15th laboratory analysis reports are located in Attachment Number 15.

Table 5. December 15, 1997 Over-Excavation Soil Samples Result Comparisons

Values are in milligrams / kilogram mg/Kg

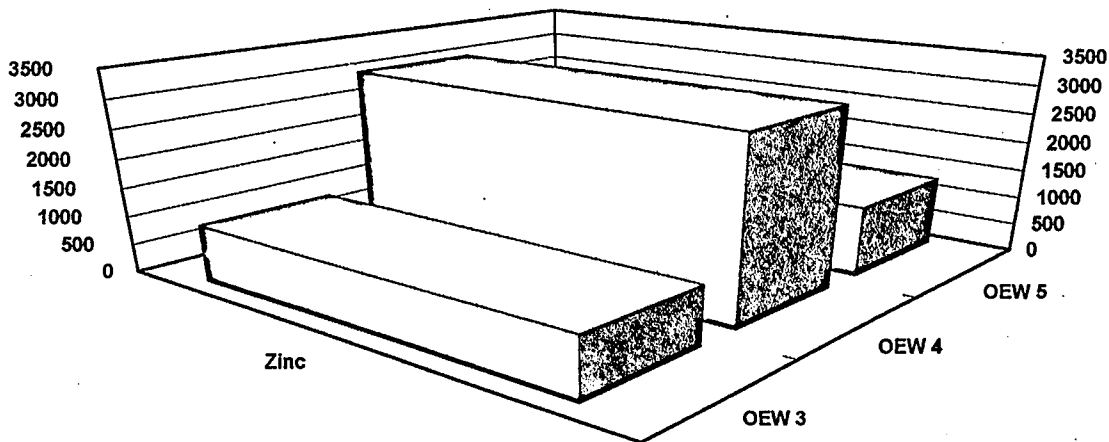
Wall (OEW 1 - OEW 8) Soil Samples Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.1125		15.8		23.675		47		5.775
OEW 1	< 0.25	0.1375	7.00	-9.50	17.00	-6.68	20.00	-27.00	6.56	0.78
OEW 2	< 0.25	0.1375	6.00	-10.50	10.00	-13.68	11.00	-36.00	6.44	0.67
OEW 3	-	-	-	-	-	-	1975.00	1928.00	6.63	0.86
OEW 4	-	-	-	-	-	-	105.00	58.00	6.56	0.78
OEW 5	-	-	-	-	-	-	390.00	343.00	5.60	-0.18
OEW 6	-	-	-	-	-	-	11.00	-36.00	5.71	-0.07
OEW 7	-	-	-	-	-	-	14.00	-33.00	6.14	0.36
OEW 8	-	-	-	-	-	-	11.00	-36.00	6.07	0.30

Floor (OEF 1 - OEF 2) Soil Samples Results Compared To Background Levels

Sample Location	Cadmium	+/- Bckgrd	Chromium	+/- Bckgrd	Lead	+/- Bckgrd	Zinc	+/- Bckgrd	pH	+/- Bckgrd
		0.1125		15.8		23.675		47.00		5.78
OEF 1							32	-15.00	4.9	-0.88
OEF 2							6	-41.00	5.87	0.09

Values in red represent results substantially greater than background levels.



**Graph E, Over-Excavation Zinc Contamination Greater Than Background**

**ADDITIONAL SOIL CORING PRIOR TO ANY FURTHER EXCAVATION**

Once the December 15th soil sample results demonstrated some zinc contamination along the northern edge of the excavation area, EMS decided to perform some additional soil coring and sampling conducted prior to any future excavation. EMS had approached a point where further excavation would impact the soil cover over the underground accumulation sump. The drawing *December 17, 1997 Soil Coring and Sampling Area*, in Attachment Number 16, provides more information on the coring area.

**December 17, 1997, Additional Soil Coring And Sampling**

EMS had a total of ten samples collected around the remaining three undisturbed sides of the sump house. The samples were taken from the one and one-half to two foot levels. The drawing *December 17, 1997 Soil Sampling Locations*, in Attachment Number 17, furnishes more information on the coring and sampling area.

**Additional Soil Core Sample Laboratory Analysis Parameters**

Since previous excavation and analysis demonstrated the only contaminant appearing in this area was zinc, EMS performed only Total Zinc and pH analysis on the ten new soil core samples. The laboratory analysis were performed by Intertek Services, Inc., 11555 South Main, Houston, Texas.

**December 17, 1997 Additional Soil Core Samples Laboratory Analysis Results**

All of the December 17, 1997, soil core samples results exhibited some degree of Total Zinc contamination. Table 6, page 14, *December 18, 1997, Additional Soil*



*Core Samples Laboratory Analysis Results* provides information on all of the sample Total Zinc and pH results. The drawing *December 18, 1997, Sample Results Greater Than Backgrounds* found in Attachment Number 18, demonstrates the location of sample results greater than background. Copies of the December 18th laboratory analysis reports are located in Attachment Number 19.

**Table 6. December 18, 1997 Additional Soil Core Samples Laboratory Analysis Results**

Values are in milligrams / kilogram mg/Kg

Sample Location	Zinc	+/- Bckgrd 47	pH	+/- Bckgrd 5.775
121897A	353.00	306.00	6.10	0.32
121897B	1490.00	1443.00	5.60	-0.18
121897C	2060.00	2013.00	5.00	-0.78
121897D	1070.00	1023.00	5.10	-0.68
121897E	1360.00	1313.00	3.90	-1.88
121897F	1420.00	1373.00	5.00	-0.78
121897G	414.00	367.00	6.20	0.43
121897H	288.00	241.00	6.40	0.63
121897I	2210.00	2163.00	6.40	0.63
121897J	2930.00	2883.00	6.20	0.43

Values in red represent results substantially greater than background levels.

**TOTAL ZINC CONTAMINATION AREA REQUIRING DEED RECORDATION**

Since the additional ten soil cores and samples reflected Total Zinc concentrations significantly greater than background levels, it was decided it would be best to halt any further soil excavation and just deed record the undisturbed metal contaminated area above the underground sump. A copy of the Deed Recordation filing documentation is located in Attachment Number 20.

**ON-SITE EXCAVATION SPOILS MANAGEMENT**

**Excavation Spoils Accumulation**

All of the excavation spoils generated during the excavation activities were accumulated on and covered with six millimeter thick plastic. The spoils pile remained covered except during the addition of new material. The drawing *On-Site Excavation Spoils Accumulation Location*, Attachment Number 21, reflects

the area where the spoils were accumulated on-site. Figure 14, *West End of the Covered Excavation Spoils* , and Figure 15, *East End of the Covered Excavation Spoils*, found in Attachment Number 6, will provide a visual of the covered excavation spoils accumulation stockpile.

#### **Excavation Spoils Samples Laboratory Analysis**

EMS had several representative soil samples collected from the spoils pile for proper waste classification and disposal analysis. EMS had TCLP Metals, Volatiles, Semi-Volatiles, Radioactivity, Reactivity, Ignitability and Corrosive as well as Hazardous Constituents laboratory analysis performed on the samples. The drawing *Excavation Spoil Sampling Points* in Attachment Number 22, will provide a plat of the spoils pile sampling points. The laboratory analysis were performed by Intertek Services, Inc., 11555 South Main, Houston, Texas.

#### **Excavation Spoils Samples Laboratory Analysis Results**

Based on the laboratory analysis results, the excavation spoils were classified as a Class II Non-Hazardous wastestream. Copies of the laboratory analysis reports are located in Attachment Number 23.

#### **Excavation Spoils Off-Site Disposal**

EMS obtained approval to dispose of the excavation spoils at the Browning Ferris Industries Beaumont Class II landfill facility. On April 30, 1998 a total of 560 cubic yards of soil were transported by Ramco Trucking, Vidor, Texas, to the BFI Beaumont Facility. Copies of the shipping manifests are located Attachment Number 24. Figure 16, *Backhoe Scooping Up Excavation Spoils* , and Figure 17, *Backhoe Loading Tandem Dump Truck* , found in Attachment Number 6, will provide a visual of the excavation spoils disposal activity.

#### **EXCAVATION HOLES CLEAN SOIL BACKFILL**

All of the excavation holes were backfilled a compacted with a clean sand - clay mixture brought in from an off-site sand pit location. Figure 18, *Backhoe Dumping Clean Backfill*, Figure 19, *Core Area B, C, and D, Backfilled and Compacted* , and Figure 20, *Project Completion* , found in Attachment Number 6, will provide a visual of the backfill and compaction activity.

Incoming  
Steel

SODIUM  
HYDROXIDE  
CLEANING

H<sub>2</sub>SO<sub>4</sub>  
PICKLE

HCL  
PREFLUX

ZINC  
KETTLE

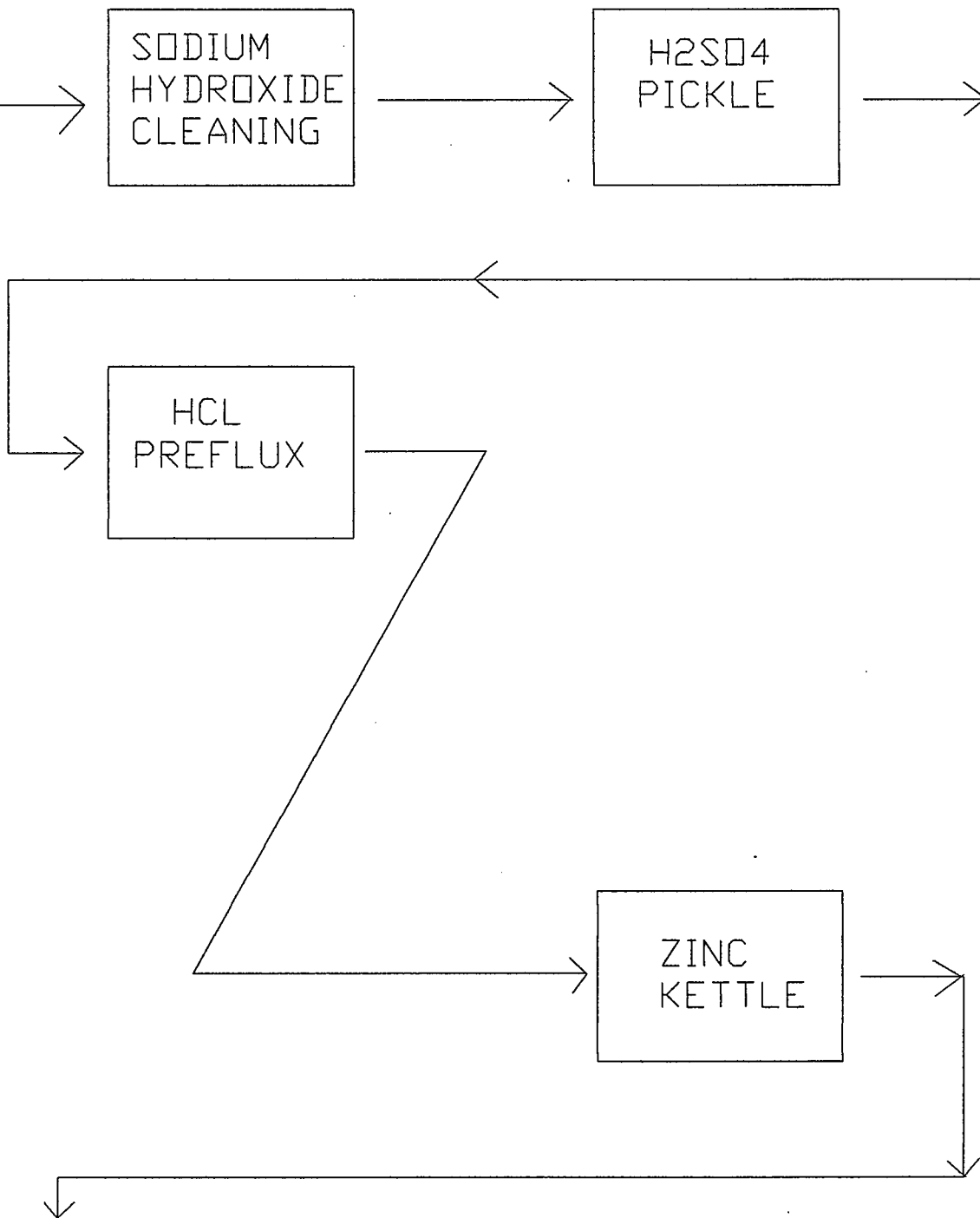
FINISHED  
PRODUCT

International Galvanizers, Inc.  
Beaumont, Texas

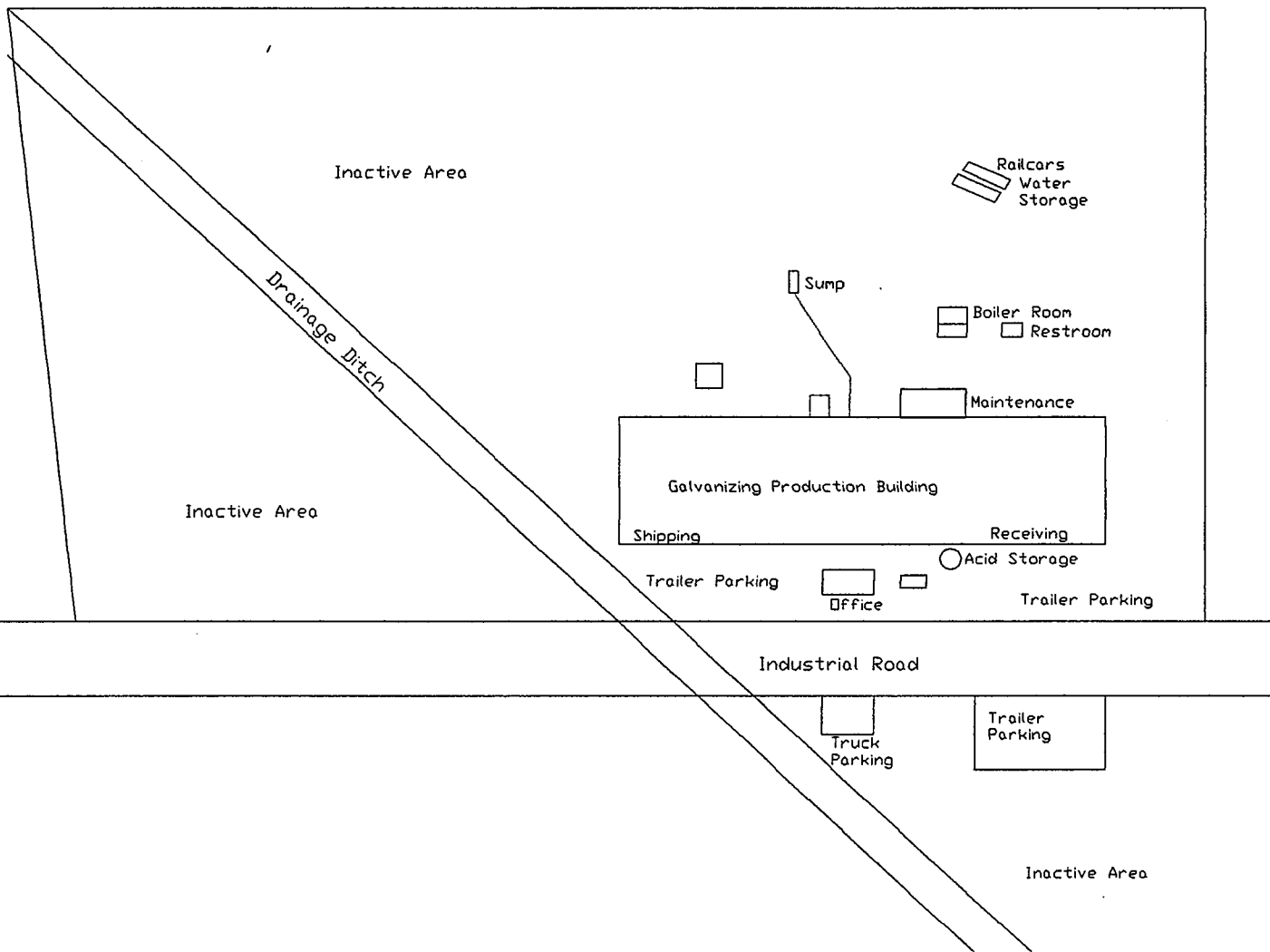
Hot Dip Galvanizing  
Process Flow Chart

Prepared By: PH, EMS  
5/28/98

IGIPROCFLOWD



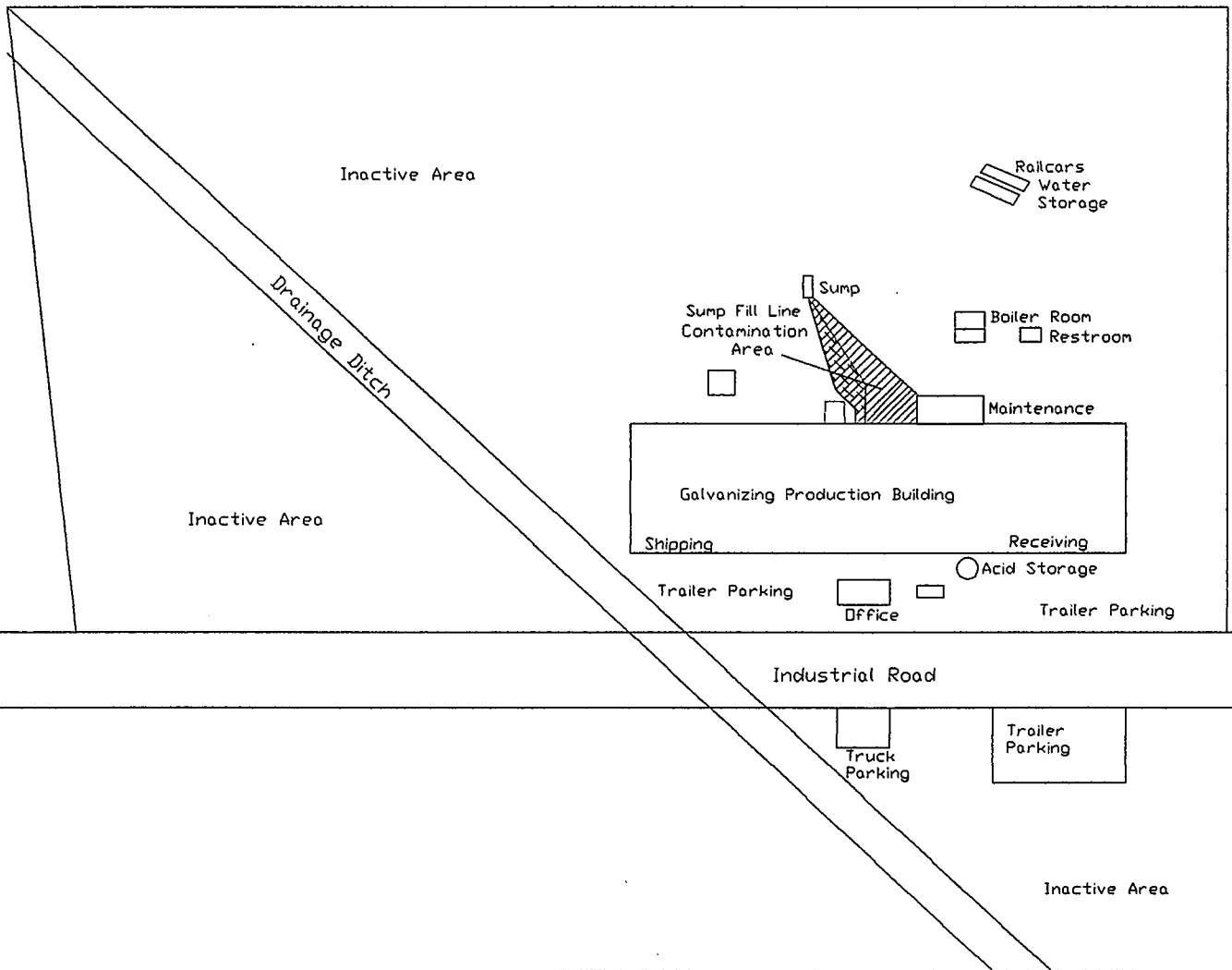




International Galvanizing, Inc.  
Beaumont, Texas

GENERAL FACILITY LAYOUT

Prepared By: Paul Hamilton  
Environmental Management Services  
GENFACA      6/30/98      Not To Scale

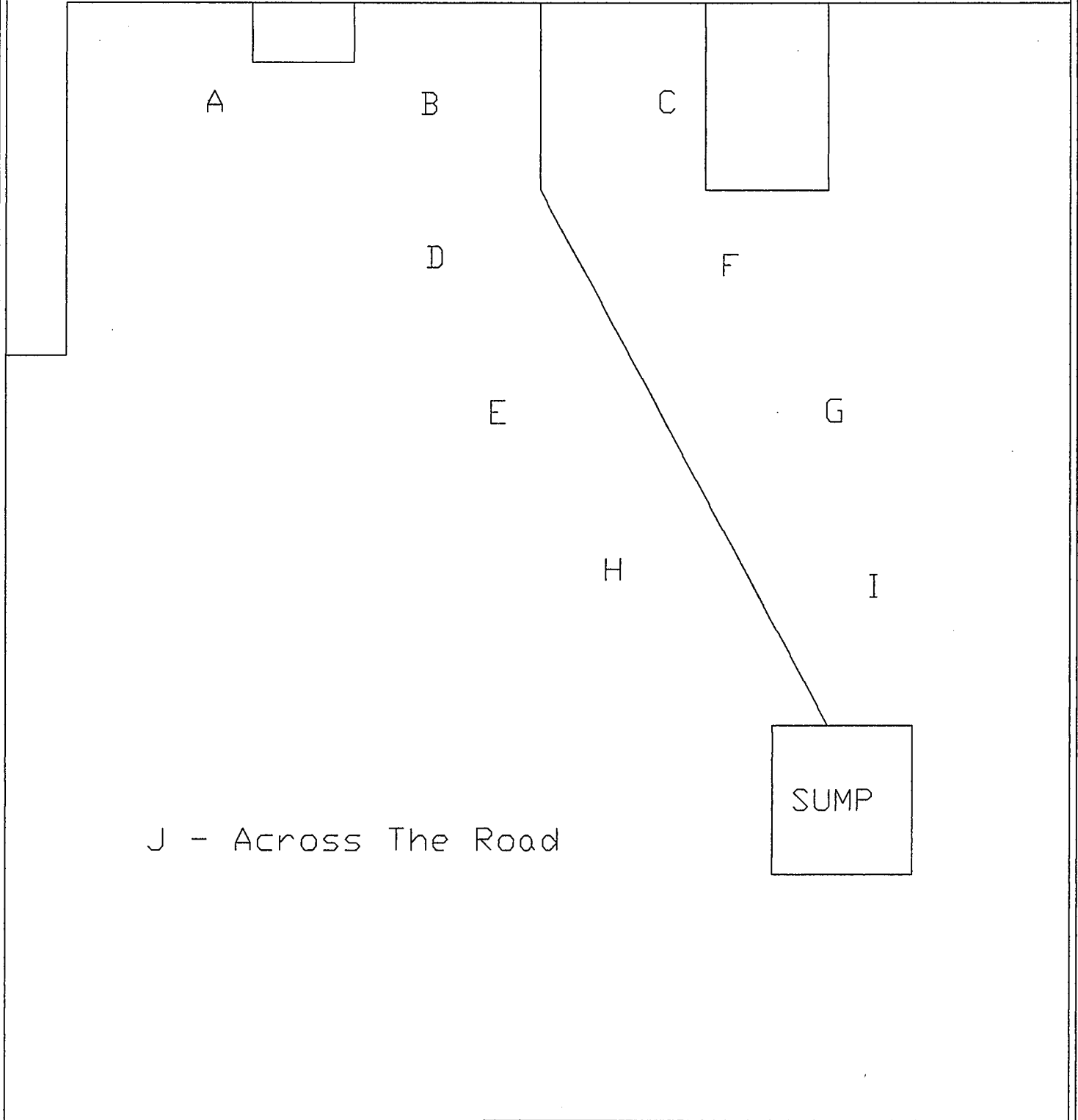


International Galvanizers, Inc.  
 Beaumont, Texas

FACILITY LAYOUT and SOIL  
 CONTAMINATION AREA

Prepared By: Paul Hamilton  
 Environmental Management Services  
 CORINGLP      7/30/98      Not To Scale

PRODUCTION BUILDING



J - Across The Road

SUMP

INTERNATIONAL GALVANIZING
A-I Soil Core Locations
ENVIRONMENTAL MANAGEMENT SERVICES
CORINGE 6/2/98 Not To Scale

**Texas Commission on Environmental Quality**  
**Investigation Report**  
**AZZ INCORPORATED**  
**CN600344816**

INTERNATIONAL GALVANIZERS

**RECEIVED**

RN100634120

**SEP 07 2010**

Investigation # 828170

Incident #

Investigator: JAMES MAYFIELD

Site ClassificationTCEQ  
CENTRAL FILE ROOM

LARGE QUANTITY GENERATOR

Conducted: 06/22/2010 -- 07/02/2010

NAIC Code: 332812

SIC Code: 3479

Program(s): INDUSTRIAL AND  
HAZARDOUS WASTE

Investigation Type : Compliance Investigation

Location : 5898 Industrial Rd, Beaumont, TX

Additional ID(s) : TXD050293794  
30568Address: 5898 INDUSTRIAL RD;  
BEAUMONT, TX 77705Activity Type : REGION 10 - BEAUMONT  
IHWLQG - CEI of large quantity generatorPrincipal(s) :

Role	Name
RESPONDENT	AZZ INCORPORATED

Contact(s) :

Role	Title	Name	Phone
Notified	PLANT MANAGER	MR BOBBY MCKINNEY	Work (409) 842-0216
Participated in Investigation	PLANT MANAGER	MR BOBBY MCKINNEY	Work (409) 842-0216
Regulated Entity Mail Contact	PLANT MANAGER	MR BOBBY MCKINNEY	Work (409) 842-0216
Participated in Investigation	CORPORATE ENVIRONMENTAL ENGINEER	MR FRANK GAUDET I PE	Work (817) 810-0095
Regulated Entity Contact	PLANT MANAGER	MR BOBBY MCKINNEY	Work (409) 842-0216

Other Staff Member(s) :

Role	Name
QA Reviewer	ROBERT COLLAZO
Supervisor	KRISTIE LEMMONS

**Associated Check List**

<u>Checklist Name</u>	<u>Unit Name</u>
IHW GENERIC OTHER ISSUES OR VIOLATIONS (10 ITEMS)	IG
IHW CONTAINER STORAGE AREA	IG
IHW CEI GENERAL FACILITY	IG

Investigation Comments :

INTRODUCTION

WST IHW/ INSPECTION REPORTS

1st: 30568 2nd: Vol: 001 6/22/2010

BBC: 100243224

IBC: 100308084





## INTERNATIONAL GALVANIZERS - BEAUMONT

6/22/2010 to 7/2/2010 Inv. # - 828170

Page 2 of 6

On June 10, 2010, I, James Mayfield, TCEQ Region 10 Environmental Investigator, contacted Mr. Bobby McKinney, Plant Manager for International Galvanizers (IG), by telephone regarding a Large Quantity Generator (LQG) Investigation. The investigation was scheduled for June 22, 2010, at 9:00 a.m. A review of the compliance history indicated the facility had an average classification. The purpose of this LQG Investigation was to determine the regulated entity's (RE) environmental compliance with applicable State [Title 30 of the Texas Administrative Code (TAC) Chapter 335 and Federal Regulations [40 Code of Federal Regulations (CFR) 260-265].

### GENERAL FACILITY AND PROCESS INFORMATION

IG, Inc. is located at 5898 Industrial Road in Beaumont, Texas (see Attachment 1, Area Map). The facility performs a hot dip galvanizing process that involves eight dipping vats. The steel is first cleaned by submerging the material into a caustic sodium hydroxide vat that removes grease and oils. Next, the steel is dipped in a 10-18% sulfuric acid bath to remove rust which is referred to as "pickling." The steel may be dipped in another acid tank that is used to strip any pieces with prior zinc plating that may require re-processing prior to the new zinc plating. The steel is then dipped in a pre-flux chloride bath to aid in the adhesion of the zinc to the metal and then dried and re-racked. Once dried, the steel is then submersed in a galvanizing bath of hot molten zinc. A quench tank cools the steel in the final step of the process (see Attachment 2, Process Flow). According to the facility's Notice of Registration (NOR), IG is a LQG (see Attachment 3, NOR/Updated NOR)

### BACKGROUND

According to the file review, three Industrial Hazardous Waste (IHW) investigations were conducted in the past five years. Two Notice of Violations were issued where one is revealed in 349763 concerning the failure to provide a written description of the type and amount of both initial and annual employee training, and one violation in 465292, regarding an incomplete hazardous waste determination record and description within the NOR.

### ADDITIONAL INFORMATION

On June 22, 2010, I met with Mr. McKinney and Mr. Frank Gaudet, Corporate Environmental Engineer. I began the investigation by discussing the scope of the investigation which included a review of the company's waste streams, manifest records, the 2009 annual waste summary, hazardous waste determination records, nonhazardous Class I waste stream profiles, the emergency response and spill prevention plan, container storage area inspection records (CSA), tank inspection records, employee hazardous waste training records, and/or other records associated to hazardous waste management practices (see Attachment 4, Facility Documentation), and a physical site review.

IG's NOR reveals 3 hazardous, 4 Class 1, and 2 Class II waste streams. Of the hazardous wastes, Waste Generation Code (WGC) 0008104H is the largest waste stream with 3,167,310 pounds of waste generated for the calendar year of 2009 (see Attachment 4). WGC 0008104H is a spent sulfuric acid solution that begins from a 98% concentrated form to a 10-15% solution during process use to remove iron oxide. When the iron content of the acid reaches 10%, the acid is then used for stripping zinc for re-processing iron, and as the acid falls to an 8% sulfuric acid content, the liquid is then considered a waste stream.

I began the investigation with a facility tour to review the process areas, container storage areas, and hazardous tanks as applicable. Mr. McKinney stated that one roll-off box existed under waste management unit 005 that contained hazardous wastes (see Attachment 5, Photographic Documentation). Under the NOR, waste management unit 005 was listed as a tank, but Mr. Gaudet stated that he would revise the NOR to list the unit as a roll-off box at a later date (see Attachment 3). The hazardous waste roll-off box was reserved for sulfuric acid tank bottom sludge (Waste Generation Code 0012319H) and an accumulation date of June 19, 2010, was observed. All pertinent information was present, the structural integrity of the box appeared to be in good condition, and the unit was covered by a tarp with black plastic interlining to prevent leaking

wastes. Mr. McKinney stated that the waste is neutralized on-site prior to leaving the facility. A copy of the neutralization process and analytical data from QUAD Environmental Services in Houston, Texas, can be found in Attachment 4. A concern regarding sealed containment during treatment was raised but Mr. Gaudet stated that the container was covered gaining compliance. This however may be a topic for review upon a subsequent investigation. The remaining CSA (waste management units 004) contained drums with either filter cake or sodium hydroxide, and no containers appeared to have integrity issues and were properly labeled. No accumulation date requirements existed as all wastes were Class I or II.

Tank 006 is the spent acid tank containing hazardous waste stream 0008104H. The tank was surrounded by a secondary containment berm, appeared to be in good condition, and was labeled properly. The tank did not have an accumulation date because no spent sulfuric acid wastes were in the tank at the time of the investigation.

No outstanding issues were observed in the facility tour except for a non-hazardous barrel located in the production/process area adjacent to the Sulfuric Acid Pickling Bath. I asked Mr. McKinney about the purpose of the container, and he stated that debris floating on the top of the bath is skimmed from the surface and placed into the container for later disposal. A question was raised concerning the properties of the debris when soaked in the sulfuric acid. If the acid was considered hazardous (WGC 0008104H), one may consider the material soaked in the hazardous material as hazardous as well. Mr. Gaudet explained that the materials are placed on top of an absorbent material to soak up any liquid from the bath. He continued stating that the waste isn't a listed waste as it does not match any of the listed wastes found in 40 CFR 261.31, and is not characteristic for corrosivity because the liquids are absorbed and the absorbent will not have a pH at or below 2.0. Correspondence concerning this waste determination can be found in Attachment 4. I asked if saturation levels of the absorbent were kept at a minimum and if a pH test was conducted on the absorbent material. Mr. Gaudet stated that no tests were conducted but the absorbent was kept relatively dry prior to disposal and can pass the paint filter test (Method 9095 is SW-846). In post review, this activity appeared to require a permit to be compliant; however, the EPA recognized that facilities may need to add absorbents to their containerized hazardous wastes to eliminate free liquids and therefore are exempt from a permit requirement. The permitting exemption is codified in 40 CFR 270.1(c)(2)(vii), and the management standard exemptions are codified in 40 CFR 264.1(g)(10) and 40 CFR 265.1(c)(13). Other than strong odors of acid in the process area, no further issues were noted.

We returned to the offices and began reviewing the documents previously mentioned in the first paragraph of this section. No compliance issues were noted in the majority of the documents except for the following topics. Regarding the recently discussed skimming materials in the previous paragraph, the NOR did not have this waste listed which appears to be an alleged violation of 30 TAC 335.6(a). Mr. Gaudet stated that he would add the waste stream to the NOR, and correspondence to the TCEQ can be found under attachment 4. In addition, an updated NOR (found in Attachment 3) reveals the waste stream as WGC 00183191, and therefore established this alleged violation as noted and resolved.

Lastly, in review of the 2009 hazardous tank inspection record concerning WGC 008104H/waste management unit 006, several gaps in dates were documented, were incomplete, and calendar year 2009 documents were mixed with calendar year 2010. With the mixed documentation and some of the documents missing the calendar year, organization was difficult to maintain. In addition, the inspection records only identified that the tank was viewed with no inspection or ancillary equipment identified as listed under CFR 265 Subpart J. I obtained the copies for 2009 (see Attachment 4) which details the missing documentation and lack of inspected equipment which appears to be a violation of 40 CFR 265.195 (a - g).

I concluded the investigation with an Exit Interview which noted the alleged violation as seen in Attachment 6, Exit Interview.

CONCLUSION

On June 22, 2010, a Large Quantity Generator Inspection was performed at International Galvanizers located in Beaumont, Texas. Two violations were documented as a result of the investigation, and therefore a Notice of Violation Letter will be sent to the facility.

ATTACHMENTS

1. Area Map
2. Process Flow
3. NOR/Updated NOR
4. Facility Documentation
5. Photographic Documentation
6. Exit Interview

**NOV Date**      **Method**  
08/31/2010      WRITTEN

**OUTSTANDING ALLEGED VIOLATION(S)  
ASSOCIATED TO A NOTICE OF VIOLATION**

Track No: 411494

Compliance Due Date: 09/30/2010

Violation Start Date: 1/1/2009

30 TAC Chapter 335.69(a)(1)(B)  
40 CFR Chapter 265.195(a)  
40 CFR Chapter 265.195(b)

**Alleged Violation:**  
Investigation: 828170

Comment Date: 08/31/2010

Failure to inspect a hazardous waste tank and associated ancillary equipment daily, and the failure to document required inspection information.

30 TAC 335.69(a)(1)(B) states that generators must comply with the applicable requirements of 40 CFR Part 265, Subparts J, AA, BB, and CC.

40 CFR 265.195(a) states that the owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design.

40 CFR 195(b) states that the owner or operator must inspect at least once each operating day: overflow/spill control equipment, above ground portions of the tank system, and the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system.

40 CFR 195(e) states that ancillary equipment that is not provided with secondary containment, as described in §265.193(f)(1) through (4), must be inspected at least once each operating day.

On June 22, 2010, the investigator performed an LQG Investigation concerning International Galvanizers in Beaumont, TX. During the review of the 2009 hazardous tank inspection record concerning WGC 008104H/waste management unit 006, several gaps in dates were documented and the records were incomplete. The inspection records only identified that the tank was viewed with no inspection or ancillary equipment identified as listed under 40 CFR 265 Subpart J.

**Recommended Corrective Action:** Alter tank inspection forms to comply with 40 CFR Part 265 Subpart J "Inspection Requirements," and ensure inspections are conducted daily and records are maintained and readily available to the executive director.

**ALLEGED VIOLATION(S) NOTED AND RESOLVED  
ASSOCIATED TO A NOTICE OF VIOLATION**

Track No: 411487

Resolution Status Date: 8/31/2010

Violation Start Date: Unknown Violation End Date: 8/26/2010

**30 TAC Chapter 335.6(a)**

**Alleged Violation:**

Investigation: 828170

Comment Date: 08/31/2010


Failure to submit a written or electronic notification to the TCEQ Executive Director of an industrial solid waste disposal activity.

30 TAC 335.6(a) states that any person who intends to store, process, or dispose of industrial solid waste without a permit, as authorized by §335.2(d), (e), (f), or (h) of this title (relating to Permit Required) or §335.24 of this title (relating to Requirements for Recyclable Materials and Nonhazardous Recyclable Materials), shall notify the executive director in writing or using electronic notification software provided by the executive director, that storage, processing, or disposal activities are planned, at least 90 days prior to engaging in such activities.

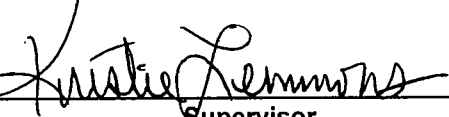
On June 22, 2010, the investigator performed an LQG Investigation concerning International Galvanizers in Beaumont, TX. During the physical inspection, I observed a container established for the collection of debris skimmed from the top of a sulfuric acid pickling bath.

**Recommended Corrective Action:** Update the facility's NOR to reflect the newly identified waste stream.

**Resolution:** The waste stream was not listed on the Notice of Registration (NOR) at the time of the inspection, but has since been placed on the most recent updated NOR on August 26, 2010.

Signed   
Environmental Investigator

Date 8/31/10

Signed   
Supervisor

Date 8/31/10

**Attachments: (in order of final report submittal)**

Enforcement Action Request (EAR)

Letter to Facility (specify type) : NOR

Investigation Report

Sample Analysis Results

Manifests

NOR

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

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## Summary of Investigation Findings

INTERNATIONAL GALVANIZERS

Investigation # 828170

5898 INDUSTRIAL RD  
BEAUMONT, JEFFERSON COUNTY, TX 77705

Investigation Date: 06/22/2010

Additional ID(s): TXD050293794  
30568

### OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 411494 Compliance Due Date: 09/30/2010

30 TAC Chapter 335.69(a)(1)(B)

40 CFR Chapter 265.195(a)

40 CFR Chapter 265.195(b)

**Alleged Violation:**

Investigation: 828170

Comment Date: 8/31/2010

Failure to inspect a hazardous waste tank and associated ancillary equipment daily, and the failure to document required inspection information.

30 TAC 335.69(a)(1)(B) states that generators must comply with the applicable requirements of 40 CFR Part 265, Subparts J, AA, BB, and CC.

40 CFR 265.195(a) states that the owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design.

40 CFR 195(b) states that the owner or operator must inspect at least once each operating day: overflow/spill control equipment, above ground portions of the tank system, and the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system.

40 CFR 195(e) states that ancillary equipment that is not provided with secondary containment, as described in §265.193(f)(1) through (4), must be inspected at least once each operating day.

On June 22, 2010, the investigator performed an LQG Investigation concerning International Galvanizers in Beaumont, TX. During the review of the 2009 hazardous tank inspection record concerning WGC 008104H/waste management unit 006, several gaps in dates were documented and the records were incomplete. The inspection records only identified that the tank was viewed with no inspection or ancillary equipment identified as listed under 40 CFR 265 Subpart J.

**Recommended Corrective Action:** Alter tank inspection forms to comply with 40 CFR Part 265 Subpart J "Inspection Requirements," and ensure inspections are conducted daily and records are maintained and readily available to the executive director.

### ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 411487

30 TAC Chapter 335.6(a)

**Alleged Violation:**

Failure to submit a written or electronic notification to the TCEQ Executive Director of an industrial solid waste disposal activity.

30 TAC 335.6(a) states that any person who intends to store, process, or dispose of industrial solid waste without a permit, as authorized by §335.2(d), (e), (f), or (h) of this title (relating to Permit Required) or §335.24 of this title (relating to Requirements for Recyclable Materials and Nonhazardous Recyclable Materials), shall notify the executive director in writing or using electronic notification software provided by the executive director, that storage, processing, or disposal activities are planned, at least 90 days prior to engaging in such activities.

On June 22, 2010, the investigator performed an LQG Investigation concerning International Galvanizers in Beaumont, TX. During the physical inspection, I observed a container established for the collection of debris skimmed from the top of a sulfuric acid pickling bath.

**Recommended Corrective Action:** Update the facility's NOR to reflect the newly identified waste stream.

**Resolution:** The waste stream was not listed on the Notice of Registration (NOR) at the time of the inspection, but has since been placed on the most recent updated NOR on August 26, 2010.

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Attachment  
1**

**AREA MAP**

INTERNATIONAL GALVANIZERS  
JUNE 22 – JULY 2, 2010  
CEI LQG  
INVESTIGATION # 828170  
EPA ID# TXD050293794  
TCEQ ID# 30568



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## AREA MAP

SITE NAME:	REGULATED NUMBER:	INVESTIGATION NUMBER:
Industrial Galvanizers	RN100634120	828170



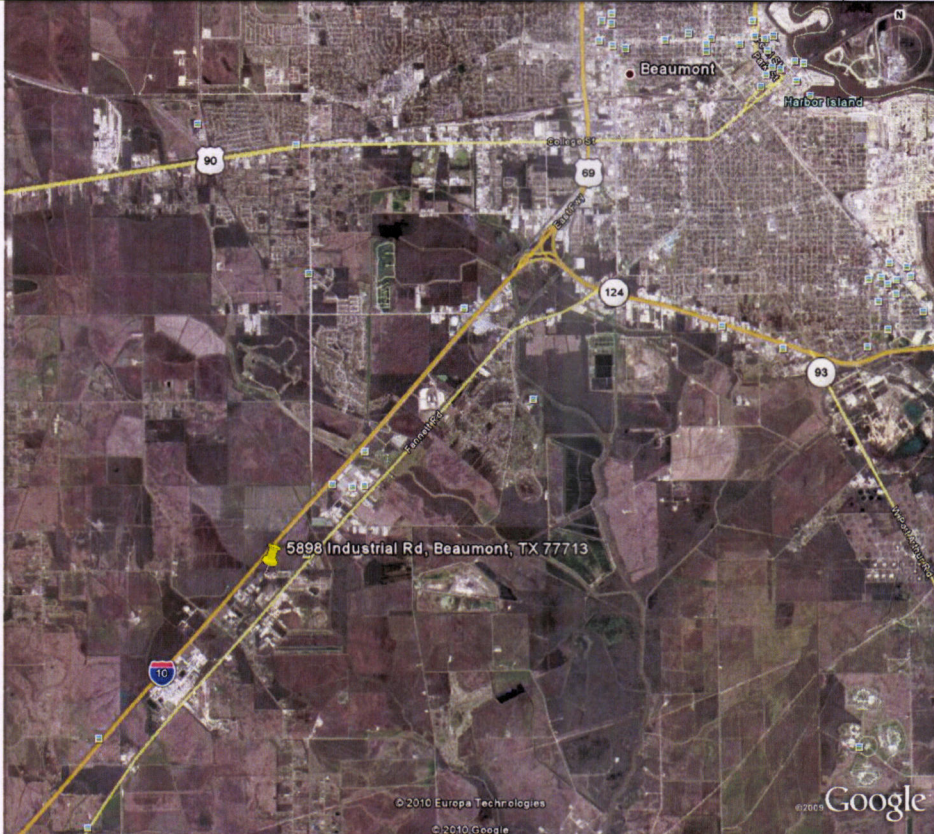
DESCRIPTION:  
Closer view of  
facility.



DESCRIPTION:  
Mid-aerial view.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## AREA MAP

SITE NAME:	REGULATED NUMBER:	INVESTIGATION NUMBER:
Industrial Galvanizers	RN100634120	828170
		DESCRIPTION: Map in relation to Beaumont, TX.

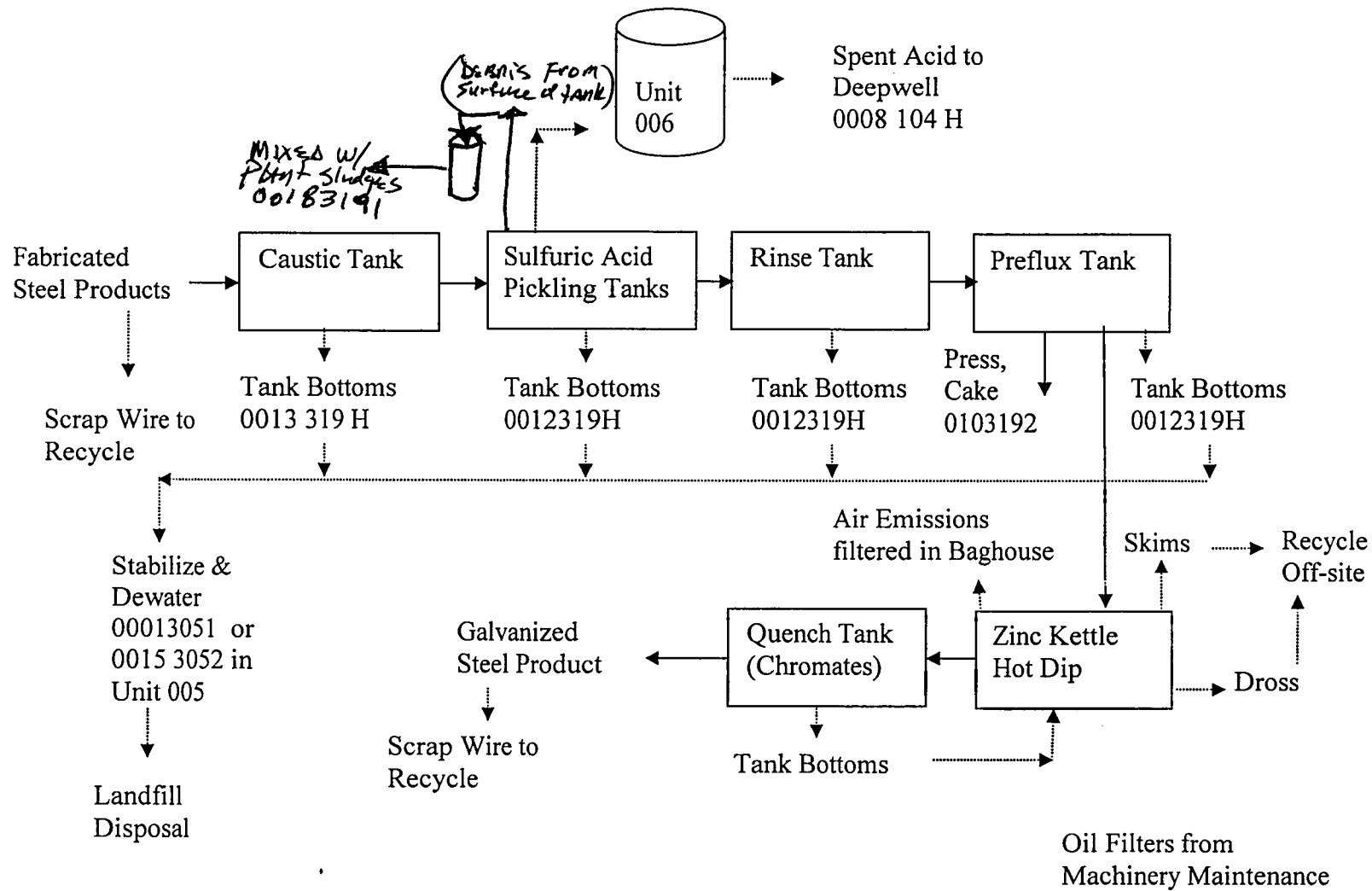
**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



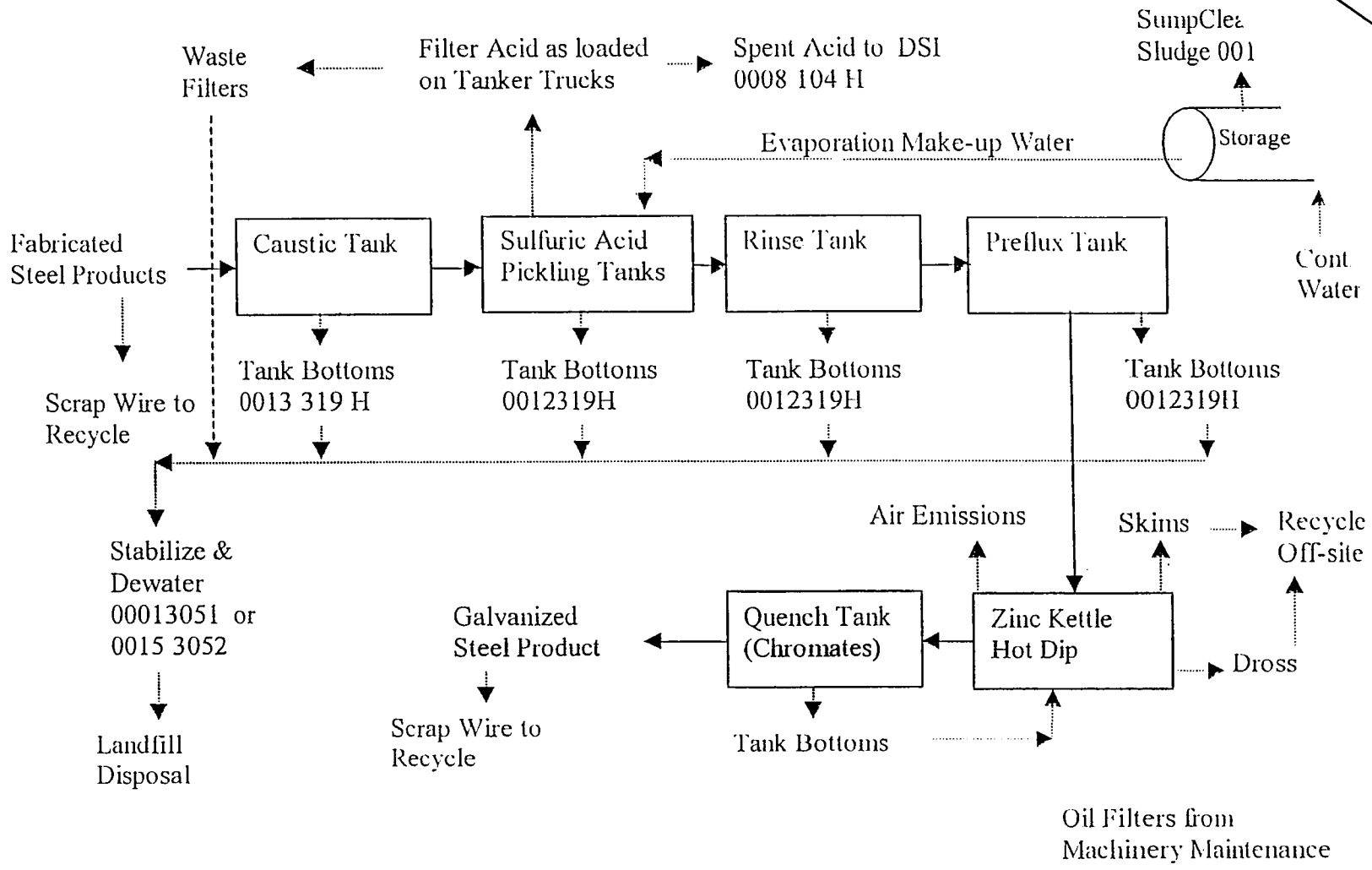
**Attachment  
2**

**PROCESS FLOW**

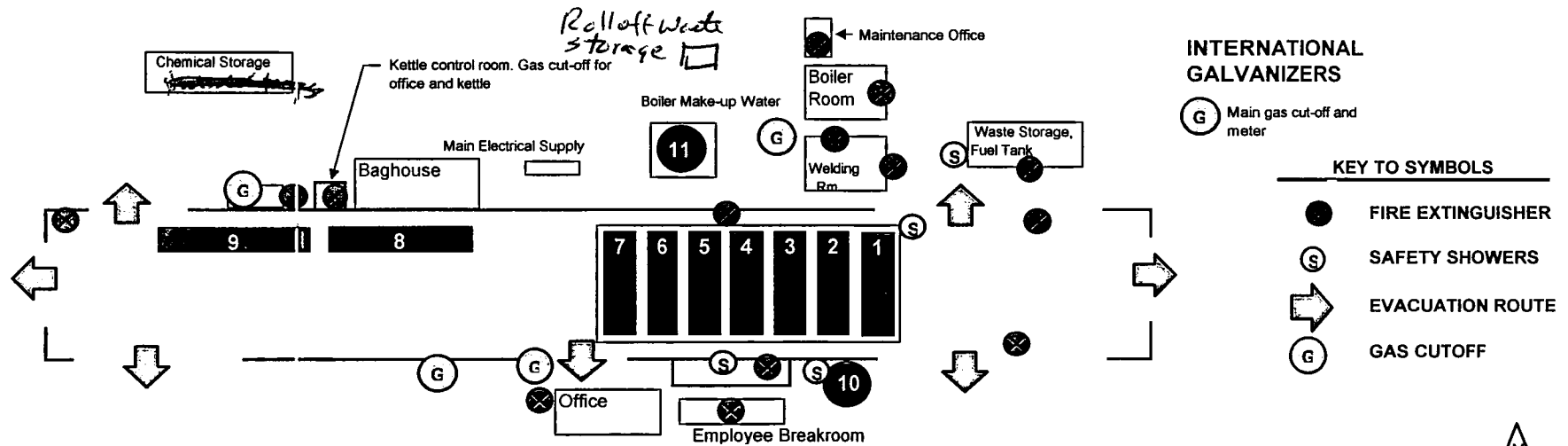
**INTERNATIONAL GALVANIZERS  
JUNE 22 – JULY 2, 2010  
CEI LQG  
INVESTIGATION # 828170  
EPA ID# TXD050293794  
TCEQ ID# 30568**



**PRODUCTION PROCESS AND WASTES GENERATED**  
**AZZ Galvanizing Beaumont**



**PRODUCTION PROCESS AND WASTES GENERATED  
INTERNATIONAL GALVANIZERS**



**INTERNATIONAL GALVANIZERS**

(G) Main gas cut-off and meter

**KEY TO SYMBOLS**

- FIRE EXTINGUISHER
- (S) SAFETY SHOWERS
- ➔ EVACUATION ROUTE
- (G) GAS CUTOFF

ITEM	NAME	CONTENTS	FLAM.	REACT.	HEALTH	SPECIAL
1	Caustic Tank	Water-Caustic Soda Solution	0	1	3	Alkali
2	Rinse Tank	Rinsewater	0	0	1	0
3	Acid Tank	Sulfuric Acid Solution-15%	0	2	3	Acid
4	Acid Tank	Sulfuric Acid Solution-15%	0	2	3	Acid
5	Acid Tank	Sulfuric Acid Solution-15%	0	2	3	Acid
6	Rinse Tank	Rinsewater	0	0	1	0
7	Preflux Tank	Water-Zinc Ammonium Chloride Solution	0	1	3	0
8	Zinc Kettle	Prime Western Zinc Solution (835°F. +/-)	1	1	3	0
9	Quench Tank	Water Chromic Acid Solution - .05%	0	1	3	Oxidizer
10	Acid Storage	Raw Sulfuric Acid - 93%	0	2	3	Acid
11	Spent Acid	Waste Sulfuric Acid	0	2	3	Acid

HAZARDOUS CHEMICAL SYMBOL

FLAMMABILITY (RED)

HEALTH (BLUE)

REACTIVITY (YELLOW)

OXY

SPECIAL HAZARDS (WHITE)  
 OXY = OXIDIZER  
 ALK = ALKALI  
 COR = CORROSIVE  
 ACID  
 W = USE NO WATER

DEGREE OF HAZARD  
 0 = INSIGNIFICANT / MINIMAL  
 1 = SLIGHT  
 2 = MODERATE  
 3 = HIGH / SERIOUS  
 4 = SEVERE / EXTREME

REVISED SITE MAP



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

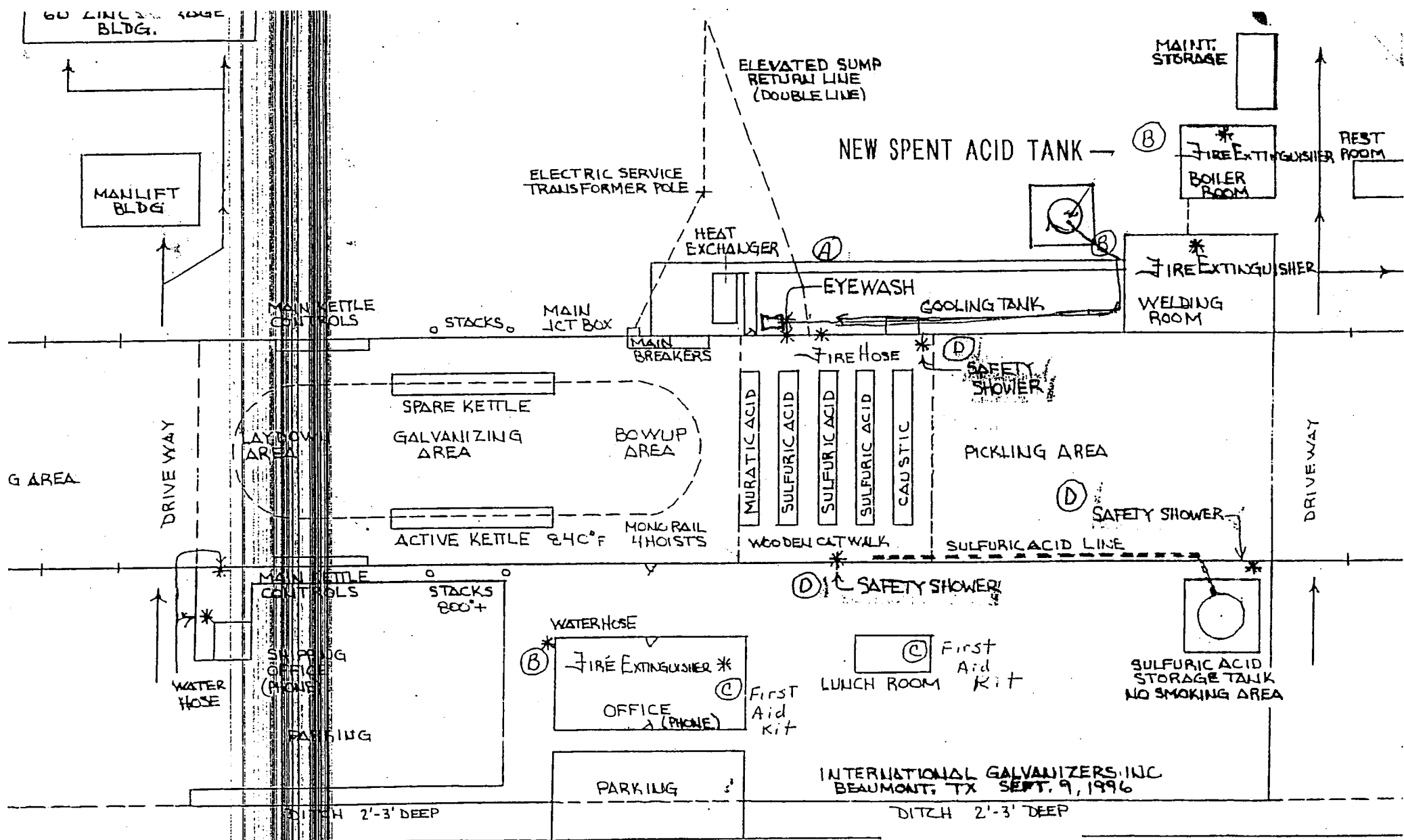


## ATTACHMENT B

<b>Solid Waste Registration No.</b>	30568	<b>Regulated Entity Name:</b>	International Galvanizers, Inc.	<b>County Name:</b>	Jefferson
<b>Investigation Date:</b>	May 9, 2006	<b>TCEQ Investigator:</b>	Vanessa Marroquin		

Facility Map





- A Eye Wash
- B Fire Extinguisher
- C First Aid Kit
- D Safety Shower

INDUSTRIAL ROAD

# SITE PLAN

INTERNATIONAL GALVANIZERS, INC.  
BEAUMONT, TX SEPT. 9, 1996

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Attachment  
3**

**NOR/UPDATED NOR**

**INTERNATIONAL GALVANIZERS**

**JUNE 22 – JULY 2, 2010**

**CEI LQG**

**INVESTIGATION # 828170**

**EPA ID# TXD050293794**

**TCEQ ID# 30568**

Report Name : NOR 30568  
Report Program : TRACS\_EXEC\_DIR/ihw\_nor\_report  
Date : 21-jun-2010 14:51:34  
User ID : rcollazo

Selection Criteria

-----  
SW Regis. #s : 30568

Selected All Wastes

Sort Criteria: Registration Number  
-----

IHW020

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
Notice of Registration  
Industrial and Hazardous Waste

Page: 1  
Date: 06/21/10

30568 International Galvanizers Inc

Solid Waste Registration Number: 30568 EPA Id: TXD050293794

Company Name: International Galvanizers Inc  
Site Name: International Galvanizers  
Site Location: 5898 Industrial Rd, Beaumont, TX  
Primary Contact: MCKINNEY, BOBBY  
Mailing Address: PO BOX 21677  
BEAUMONT, TX 77720-1677

Region: 10  
County: 123 Jefferson  
Land Type: Private  
Title: PLANT MANAGER  
Site Street Address: 5898 Industrial Rd  
Beaumont, TX 77705-6959

Initial Registration Date: 05/18/1976  
Last Amendment Date: 03/19/2009  
Last Date NOR Computer update: 03/24/2009  
Phone: 409-842-0216  
Reporting Method: STEERS

Registration Status: Active  
Registration Type: Generator  
Generator Type: Industrial

Hazardous Waste Generation Status: Large Quantity Generator

NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv  
Handler Status:

Operator Information

Name: International Galvanizers Inc  
Phone: 409-842-0216  
Address: 5898 Industrial RD

Beaumont, TX, 77705-6959

Owner Information

Name: AZZ Incorporated  
Phone: 409-842-0216  
Address: 1300 S University Dr  
Ste 200  
Fort Worth, TX, 76107-5736

Billing Contact: GAUDET, FRANK  
Billing Address: ATTN: ACCOUNTS PAYABLE  
3100 W 7TH ST  
STE 500  
FORT WORTH, TX 76107

Title: Phone: 817-810-0095

Other Contact: Gaudet, Frank  
Mailing Address: 3100 W 7TH ST  
AZZ INC STE 500  
FORT WORTH, TX 76107-5736

Role: STEERS Contact Phone: 817-297-4361

As of 03/19/2009 - the next unassigned sequence number for WASTES is 0016 and  
the next unassigned sequence number for UNITS is 007.

*Non-Haz waste streams, pic w David Not on NCR  
 corr, From Floor Sweep & Skimming*

IHW020

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
 Notice of Registration  
 Industrial and Hazardous Waste

Page: 2  
 Date: 06/21/10

30568 International Galvanizers Inc

\*\*\*\* WASTE INFORMATION \*\*\*\*

Waste Code	Waste Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
------------	-------------	--------	----------------	------------------------	--------------	---------------------

\*\*\*\*\* Active Wastes \*\*\*\*\*

0008104H H Active 06/24/94 On/Off No No  
 Description from Generator: Spent sulfuric acid from steel pickle operations  
 Refers to waste code (6): 900040  
 Texas Form Code: 104 Spent acid without metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010  
 Current Management Units: Tank 006  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

*photo #3 empty vials about away of 6 vials  
 polypropylene beakers to prevent sun cracking*

00103192 2 Active 03/27/03 On No Yes  
 Description from Generator: Cake from Preflux Filter Press. Preflux tank solution of zinc ammonium chloride is circulated through plate and frame filter press to remove particulates. Waste is cake from filter press.  
 Texas Form Code: 319 Other waste inorganic solids  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): CAKE FROM PREFLUX FI

*zinc ammonium chloride  
 only 3 NO char*

0012319H H Active 09/07/97 On/Off No  
 Description from Generator: Sulfuric acid process tank bottoms clean out.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010  
 Current Management Units: Tank 005  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

*Neutralized in roll off box  
 roll off  
 ! changed to roll off box  
 see email response*

0013319H H Active 09/07/97 On/Off No  
 Description from Generator: Sodium hydroxide process tank bottoms clean out.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: Tank 005  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

00153022 2 Active 02/10/04 On/Off No No  
 Description from Generator: Sludges from galvanizing process are stabilized to neutralize acid and caustics and to bind metal contaminants.  
 Texas Form Code: 302 Soil contaminated with inorganics only  
 Current Management Units: Tank 005  
 \* Origin Codes: 5 Onsite haz waste mgmt  
 Company's Internal Code(s): STABILIZED SLUDGES

\* The first value is considered the primary value (e.g. primary origin code).  
 As of 03/19/2009, the next unassigned sequence number for WASTES is 0016.

Refer to 40 CFR Part 261 for Descriptions of EPA Hazardous Waste Numbers.

*REVISIT Sulfuric Acid Tank Replacement*

*Waste at filter top open, leaking*

*roll off box  
 Is dismantled  
 Asked for  
 DO returned  
 DOC*

Notice of Registration  
Industrial and Hazardous Waste

30568 International Galvanizers Inc

Texas Waste Code	Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
00013051	1	Inactive	03/27/01	NA	No	No

\*\* No Longer Generated Wastes \*\*

-----

00013051 1 Inactive 03/27/01 NA No  
 Description from Generator: Stabilized solids from hot dip galvanizing, pickling tank bottoms chemically tre Waste inactivated due to source reduction.  
 Texas Form Code: 305 "Dry" lime or metal hydroxide solids chem "fixed"  
 Current Management Units: None  
 \* Origin Codes: 5 Onsite haz waste mgmt 1 Onsite-process/service

-----

00022061 1 Inactive 03/27/01 NA No  
 Description from Generator: Waste oil generated during equipment and motor oil changes Waste inactivated due to source reduction. Waste inactivated due to rule change.  
 Texas Form Code: 206 Waste oil  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

*Recycling CNI Oil Azarment*

-----

0003104H H Inactive 03/27/01 NA No No  
 Description from Generator: Spent hydrochloric acid from steel pickle operations Waste inactivated due to product change.  
 Refers to waste code (6): 900060  
 Texas Form Code: 104 Spent acid without metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

00041091 1 Inactive 05/09/06 NA No  
 Description from Generator: Spent sodium hydroxide from cleaning operations; A new hazardous waste determination has been performed on this waste.  
 Refers to waste code (6): 900120  
 Texas Form Code: 109 Spent caustic  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

00053041 1 Inactive 02/08/05 NA No  
 Description from Generator: Molten zinc kettle surface skimmings - zinc oxide, sold for recovery; Material has been excluded from being a solid waste or hazardous waste.  
 Refers to waste code (6): 171110  
 Texas Form Code: 304 Other "dry" ash, slag, or thermal inorgan. residue  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

*pickled steel 3500 gallon tank in BERM*

X

Notice of Registration  
Industrial and Hazardous Waste

30568 International Galvanizers Inc  
 Texas Waste Status Date of Managed Radio- TCEQ Audit  
 Waste Class Status Onsite/ active Complete  
 Code Offsite

\*\* No Longer Generated Wastes \*\*

-----

00063191 1 Inactive 05/09/06 NA No  
 Description from Generator: Molten zinc kettle bottoms removal - dross, sold for recovery; Initial waste code determination used in incorrect form and/or classification code or other mistake.  
 Refers to waste code (6): 176450  
 Texas Form Code: 319 Other waste inorganic solids  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

0007104H H Inactive 03/27/01 NA No No  
 Description from Generator: Spent metal treatment solution - no longer generated Waste inactivated due to product change.  
 Refers to waste code (6): 900100  
 Texas Form Code: 104 Spent acid without metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

00093101 1 Inactive 03/27/01 NA No  
 Description from Generator: Spent waste oil filters from motor oil changed Waste inactivated due to rule change.  
 Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

0011319H H Inactive 03/27/01 NA No  
 Description from Generator: Hydrochloric acid process tank bottoms clean out. Waste inactivated due to product change.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

30568 International Galvanizers Inc

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
0014319H	H	Inactive	03/27/01	NA	No	No

\*\* No Longer Generated Wastes \*\*

-----

0014319H H Inactive 03/27/01 NA No No  
 Description from Generator: Hydrochloric acid and sulfuric acid process underground sump bottoms clean out. Waste inactivated due to source reduction.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

171110 1 Inactive 11/06/98 NA No  
 Description from Generator: ZINC OXIDE  
 Texas Form Code:  
 Current Management Units: None  
 \* Origin Codes:

-----

176450 1 Inactive 11/06/98 NA No  
 Description from Generator: ZINC DROSS  
 Texas Form Code:  
 Current Management Units: None  
 \* Origin Codes:

-----

900040 H Inactive 11/06/98 NA No No  
 Description from Generator: ACID, SULFURIC  
 Texas Form Code: 103 Spent acid with metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

900060 H Inactive 11/06/98 NA No No  
 Description from Generator: ACID, HYDROCHLORIC (HCL)  
 Texas Form Code: 103 Spent acid with metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----



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\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
Notice of Registration  
Industrial and Hazardous Waste

Page: 6  
Date: 06/21/10

30568 International Galvanizers Inc  
Texas Waste Status Date of Managed Radio- TCEQ Audit  
Waste Class Status Onsite/ active Complete  
Code Offsite

\*\* No Longer Generated Wastes \*\*

-----  
900100 H Inactive NA No  
Description from Generator: METAL TREATMENT SOLUTION, ACID (SPENT)  
Texas Form Code:  
EPA Form Code:  
EPA Hazardous Waste Numbers: K062  
Current Management Units: None  
\* Origin Codes:

-----  
900120 H Inactive 11/06/98 NA No No  
Description from Generator: SODIUM HYDROXIDE SOLUTION  
Texas Form Code: 103 Spent acid with metals  
EPA Form Code: W103 Spent concentrated acid  
EPA Hazardous Waste Numbers: D002  
Current Management Units: None  
\* Origin Codes: 1 Onsite-process/service  
\* Source Codes: G02 Stripping and acid or caustic cleaning  
\* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----  
\* The first value is considered the primary value (e.g. primary origin code).  
As of 03/19/2009, the next unassigned sequence number for WASTES is 0016.

30568 International Galvanizers Inc

\*\*\*\* UNITS AT THIS SITE MANAGING WASTE \*\*\*\*

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
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\*\* 'Active', 'Closure Pending' & 'Closure Request' Units \*\*

003	Sump	Closure Pending	02/08/05	/ NA	NA	NA		NA /
-----	------	-----------------	----------	------	----	----	--	------

*look into that, s*

Description from Company: Wastewater storage  
 System Types: 141 Storage, bulking, and/or transfer off-site - no tr  
 Biennial System Regulatory Status: Regulatory status unknown  
 Wastes Currently Managed in Unit:  
 Wastes Previously Managed in Unit: 0003104H 00041091 0007104H 0008104H 900040 900060 900100 900120

005	Tank	Active	06/02/98	2 H/ NA	NA	NA	RCRA Pmt Exempt-Tot Enc1 trtmt	NA /
-----	------	--------	----------	---------	----	----	--------------------------------	------

Description from Company: Portable sludge blending roll-off container used to neutralize and stabilize sludges.  
 System Types: 111 Stabilization or chemical fixation prior to dispos  
 Biennial System Regulatory Status: All units exempt from EPA and TX permits  
 Wastes Currently Managed in Unit: 0012319H Sulfuric a 0013319H Sodium hyd 00153022 Sludges fr  
 Wastes Previously Managed in Unit: 00013051 0014319H

*Photo*

006	Tank	Active	02/08/05	H/ NA	NA	NA	RCRA Permit Exempt<90 Day Storage	NA /
-----	------	--------	----------	-------	----	----	-----------------------------------	------

Description from Company: Spent Acid Storage Tank  
 Capacity: 10500.0000 Capacity Unit of Measure: G  
 System Types: 141 Storage, bulking, and/or transfer off-site - no tr  
 Wastes Currently Managed in Unit: 0008104H Spent sulf

As of 03/19/2009, the next unassigned sequence number for UNITS is 007.

\*\* 'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not required' Units \*\*

001	Surface Impoundment	Closed		/ NA	NA	NA		NA /
-----	---------------------	--------	--	------	----	----	--	------

Description from Company: 125'X 252'X 265'X 12"  
 System Types:  
 Wastes Previously Managed in Unit: 900100

002	Surface Impoundment	Closed		/ NA	NA	NA		NA /
-----	---------------------	--------	--	------	----	----	--	------

Description from Company: 395'X 317'X 235'X 36"  
 System Types:  
 Wastes Previously Managed in Unit: 900100

*SCRAP metal  
set out undetermined  
time, cut placed in  
Roll off box, I-67 box*

Report Name : jmayfiel  
Report Program : TRACS\_EXEC\_DIR/ihw\_nor\_report  
Date : 31-aug-2010 12:43:40  
User ID : friley

Selection Criteria

-----  
SW Regis. #s : 30568

Sort Criteria: Registration Number  
-----

IHW020

\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*

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Notice of Registration  
Industrial and Hazardous Waste

30568 International Galvanizers Inc

Solid Waste Registration Number: 30568 EPA Id: TXD050293794

Company Name: International Galvanizers Inc  
Site Name: International Galvanizers  
Site Location: 5898 Industrial Rd, Beaumont, TX  
Primary Contact: MCKINNEY, BOBBY  
Mailing Address: 5898 INDUSTRIAL RD  
BEAUMONT, TX 77705-6959

Region: 10  
County: 123 Jefferson  
Land Type: Private  
Title: PLANT MANAGER  
Site Street Address: 5898 Industrial Rd  
Beaumont, TX 77705-6959

Initial Registration Date: 05/18/1976  
Last Amendment Date: 08/26/2010  
Last Date NOR Computer update: 08/31/2010  
Phone: 409-842-0216  
Reporting Method: STEERS

Registration Status: Active  
Registration Type: Generator  
Generator Type: Industrial

Hazardous Waste Generation Status: Large Quantity Generator

NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv  
Handler Status:

Operator Information

Name: International Galvanizers Inc  
Phone: 409-842-0216  
Address: 5898 Industrial RD  
Beaumont, TX, 77705-6959

Owner Information

Name: AZZ Incorporated  
Phone: 409-842-0216  
Address: 1300 S University Dr  
Ste 200  
Fort Worth, TX, 76107-5736

Billing Contact: GAUDET, FRANK  
Billing Address: ATTN: ACCOUNTS PAYABLE  
3100 W 7TH ST  
STE 500  
FORT WORTH, TX 76107

Title: Phone: 817-810-0095

Other Contact: Gaudet, Frank  
Mailing Address: 3100 W 7TH ST  
AZZ INC STE 500  
FORT WORTH, TX 76107-5736

Role: STEERS Contact Phone: 817-297-4361

As of 08/26/2010 - the next unassigned sequence number for WASTES is 0019 and  
the next unassigned sequence number for UNITS is 008.

30568 International Galvanizers Inc

## \*\*\*\* WASTE INFORMATION \*\*\*\*

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
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## \*\*\*\*\* Active Wastes \*\*\*\*\*

-----

0008104H H	Active	06/24/94	On/Off	No	No	
Description from Generator: Spent sulfuric acid from steel pickle operations						
Refers to waste code (6): 900040						
Texas Form Code: 104 Spent acid without metals						
EPA Form Code: W103 Spent concentrated acid						
EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010						
Current Management Units: Tank 006						
* Origin Codes: 1 Onsite-process/service						
* Source Codes: G05 Metal forming and treatment (pickling, heat treati						
* Measurement Points: 1 Before mixing						
* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv						

-----

00103192 2	Active	03/27/03	On	No	Yes	
Description from Generator: Cake from Preflux Filter Press. Preflux tank solution of zinc ammonium chloride is circulated through plate and frame filter press to remove particulates. Waste is cake from filter press.						
Texas Form Code: 319 Other waste inorganic solids						
Current Management Units: Contain Store Area 004						
* Origin Codes: 1 Onsite-process/service						
Company's Internal Code(s): CAKE FROM PREFLUX FI						

-----

0012319H H	Active	09/07/97	On/Off	No	No	
Description from Generator: Sulfuric acid process tank bottoms clean out.						
Texas Form Code: 319 Other waste inorganic solids						
EPA Form Code: W319 Other inorganic solids						
EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010						
Current Management Units: Contain Store Area 004						
Misc Store Container 005						
* Origin Codes: 1 Onsite-process/service						
* Source Codes: G14 Removal of tank sludge, sediments or slag						
* Measurement Points: 1 Before mixing						
* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv						

-----

0013319H H	Active	09/07/97	On/Off	No	No	
Description from Generator: Sodium hydroxide process tank bottoms clean out.						
Texas Form Code: 319 Other waste inorganic solids						
EPA Form Code: W319 Other inorganic solids						
EPA Hazardous Waste Numbers: D002						
Current Management Units: Contain Store Area 004						
Misc Store Container 005						
* Origin Codes: 1 Onsite-process/service						
* Source Codes: G14 Removal of tank sludge, sediments or slag						
* Measurement Points: 1 Before mixing						
* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv						

-----

00153022 2	Active	02/10/04	On/Off	No	No	
Description from Generator: Sludges from galvanizing process are stabilized to neutralize acid and caustics and to bind metal contaminants.						
Texas Form Code: 302 Soil contaminated with inorganics only						
Current Management Units: Misc Store Container 005						
* Origin Codes: 5 Onsite haz waste mgmt						
Company's Internal Code(s): STABILIZED SLUDGES						

30568 International Galvanizers Inc  
 Texas Waste Status Date of Managed Radio- TCEQ Audit  
 Waste Class Status Onsite/ active Complete  
 Code Offsite

\*\*\*\*\* Active Wastes \*\*\*\*\*

-----  
 00169992 2 Active 06/21/10 On/Off No No  
 Description from Generator: Plant trash from office, break room and plant. Includes paper waste, food waste, waste packaging, and empty containers.  
 Texas Form Code: 999 Plant Refuse  
 Current Management Units: Misc Store Container 007  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): PLANT TRASH

-----  
 00183191 1 Active 07/15/10 On/Off No No  
 Description from Generator: Galvanizing process tanks are skimmed to remove floating debris. The skims are placed in a container with absorbent to dewater the waste.  
 Texas Form Code: 319 Other waste inorganic solids  
 Current Management Units: Misc Store Container 005  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): SKIMS AND ABSORBENT

-----  
 \* The first value is considered the primary value (e.g. primary origin code).  
 As of 08/26/2010, the next unassigned sequence number for WASTES is 0019.

-----  
 \*\* No Longer Generated Wastes \*\*

-----  
 00013051 1 Inactive 03/27/01 NA No  
 Description from Generator: Stabilized solids from hot dip galvanizing, pickling tank bottoms chemically tre Waste inactivated due to source reduction.  
 Texas Form Code: 305 "Dry" lime or metal hydroxide solids chem "fixed"  
 Current Management Units: None  
 \* Origin Codes: 5 Onsite haz waste mgmt 1 Onsite-process/service

-----  
 00022061 1 Inactive 03/27/01 NA No  
 Description from Generator: Waste oil generated during equipment and motor oil changes Waste inactivated due to source reduction. Waste inactivated due to rule change.  
 Texas Form Code: 206 Waste oil  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----  
 0003104H H Inactive 03/27/01 NA No No  
 Description from Generator: Spent hydrochloric acid from steel pickle operations Waste inactivated due to product change.  
 Refers to waste code (6): 900060  
 Texas Form Code: 104 Spent acid without metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002 D006 D007 D008 D010  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

30568 International Galvanizers Inc

Texas Waste Code	Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
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\*\* No Longer Generated Wastes \*\*

-----

00041091 1 Inactive 05/09/06 NA No  
 Description from Generator: Spent sodium hydroxide from cleaning operations; A new hazardous waste determination has been performed on this waste.  
 Refers to waste code (6): 900120  
 Texas Form Code: 109 Spent caustic  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

00053041 1 Inactive 02/08/05 NA No  
 Description from Generator: Molten zinc kettle surface skimmings - zinc oxide, sold for recovery; Material has been excluded from being a solid waste or hazardous waste.  
 Refers to waste code (6): 171110  
 Texas Form Code: 304 Other "dry" ash, slag, or thermal inorgan. residue  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

00063191 1 Inactive 05/09/06 NA No  
 Description from Generator: Molten zinc kettle bottoms removal - dross, sold for recovery; Initial waste code determination used in incorrect form and/or classification code or other mistake.  
 Refers to waste code (6): 176450  
 Texas Form Code: 319 Other waste inorganic solids  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

0007104H H Inactive 03/27/01 NA No No  
 Description from Generator: Spent metal treatment solution - no longer generated Waste inactivated due to product change.  
 Refers to waste code (6): 900100  
 Texas Form Code: 104 Spent acid without metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

00093101 1 Inactive 03/27/01 NA No  
 Description from Generator: Spent waste oil filters from motor oil changed Waste inactivated due to rule change.  
 Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

-----

30568 International Galvanizers Inc

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
0011319H	H	Inactive	03/27/01	NA	No	No

\*\* No Longer Generated Wastes \*\*

-----

0011319H H Inactive 03/27/01 NA No No  
 Description from Generator: Hydrochloric acid process tank bottoms clean out. Waste inactivated due to product change.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv)

-----

0014319H H Inactive 03/27/01 NA No No  
 Description from Generator: Hydrochloric acid and sulfuric acid process underground sump bottoms clean out. Waste inactivated due to source reduction.  
 Texas Form Code: 319 Other waste inorganic solids  
 EPA Form Code: W319 Other inorganic solids  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G14 Removal of tank sludge, sediments or slag  
 \* Measurement Points: 1 Before mixing  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv)

-----

00173192 2 Inactive 08/10/10 NA No No  
 Description from Generator: Cake from plate and frame filter press used to filter preflux solution of zinc ammonium chloride.; Initial waste code determination used in incorrect form and/or classification code or other mistake.  
 Texas Form Code: 319 Other waste inorganic solids  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): PREFLUX FILTER CAKE

-----

171110 1 Inactive 11/06/98 NA No No  
 Description from Generator: ZINC OXIDE  
 Texas Form Code:  
 Current Management Units: None  
 \* Origin Codes:

-----

176450 1 Inactive 11/06/98 NA No No  
 Description from Generator: ZINC DROSS  
 Texas Form Code:  
 Current Management Units: None  
 \* Origin Codes:

-----



30568 International Galvanizers Inc

Waste Code	Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TCEQ Audit Complete
900040	H	Inactive	11/06/98	NA	No	No

\*\* No Longer Generated Wastes \*\*

-----

900040 H Inactive 11/06/98 NA No No  
 Description from Generator: ACID, SULFURIC  
 Texas Form Code: 103 Spent acid with metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

900060 H Inactive 11/06/98 NA No No  
 Description from Generator: ACID, HYDROCHLORIC (HCL)  
 Texas Form Code: 103 Spent acid with metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G05 Metal forming and treatment (pickling, heat treati  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

900100 H Inactive NA No  
 Description from Generator: METAL TREATMENT SOLUTION, ACID (SPENT)  
 Texas Form Code:  
 EPA Form Code:  
 EPA Hazardous Waste Numbers: K062  
 Current Management Units: None  
 \* Origin Codes:

-----

900120 H Inactive 11/06/98 NA No No  
 Description from Generator: SODIUM HYDROXIDE SOLUTION  
 Texas Form Code: 103 Spent acid with metals  
 EPA Form Code: W103 Spent concentrated acid  
 EPA Hazardous Waste Numbers: D002  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: G02 Stripping and acid or caustic cleaning  
 \* NAICS Code: 332812 Metal Coating, Engraving (except Jewelry and Silv

-----

\* The first value is considered the primary value (e.g. primary origin code).  
 As of 08/26/2010, the next unassigned sequence number for WASTES is 0019.

30568 International Galvanizers Inc

## \*\*\*\* UNITS AT THIS SITE MANAGING WASTE \*\*\*\*

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
** 'Active', 'Closure Pending' & 'Closure Request' Units **								
003	Sump	Closure Pending	02/08/05	/ NA	NA	NA		NA /
Description from Company: Wastewater storage								
System Types: 141 Storage, bulking, and/or transfer off-site - no tr								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit:								
Wastes Previously Managed in Unit: 0003104H 00041091 0007104H 0008104H 900040 900060 900100 900120								
004	Contain Store Area	Active		2 H/ NA	NA	NA		NA /
System Types:								
Wastes Currently Managed in Unit: 00103192 Cake from 0012319H Sulfuric a 0013319H Sodium hyd								
Wastes Previously Managed in Unit: 00022061 00041091 00053041 00063191 00093101 0011319H 0014319H 171110 176450								
005	Misc Store Container	Active	06/02/98	1 2 H/ NA	NA	NA	RCRA Permit Exempt<90 Day Storage	NA /
Description from Company: Portable sludge blending roll-off container used to neutralize and stabilize sludges.								
System Types: 111 Stabilization or chemical fixation prior to dispo								
Biennial System Regulatory Status: All units exempt from EPA and TX permits								
Wastes Currently Managed in Unit: 0012319H Sulfuric a 0013319H Sodium hyd 00153022 Sludges fr 00183191 Galvanizin								
Wastes Previously Managed in Unit: 00013051 0014319H 00173192								
006	Tank	Active	02/08/05	H/ NA	NA	NA	RCRA Permit Exempt<90 Day Storage	NA /
Description from Company: Spent Acid Storage Tank								
Capacity: 10500.0000 Capacity Unit of Measure: G								
System Types: 141 Storage, bulking, and/or transfer off-site - no tr								
Wastes Currently Managed in Unit: 0008104H Spent sulf								
007	Misc Store Container	Active	06/21/10	2/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: Dumpster used for plant trash.								
Capacity: 5.0000 Capacity Unit of Measure: Y								
System Types: 141 Storage, bulking, and/or transfer off-site - no tr								
Wastes Currently Managed in Unit: 00169992 Plant tras								
As of 08/26/2010, the next unassigned sequence number for UNITS is 008.								
** 'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not required' Units **								
001	Surface Impoundment	Closed		/ NA	NA	NA		NA /
Description from Company: 125'X 252'X 265'X 12"								
System Types:								
Wastes Previously Managed in Unit: 900100								
002	Surface Impoundment	Closed		/ NA	NA	NA		NA /

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\*\*\* TEXAS COMMISSION ON ENVIRONMENTAL QUALITY \*\*\*  
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Industrial and Hazardous Waste

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30568 International Galvanizers Inc

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
** 'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not Required' Units **								
Description from Company: 395'X 317'X 235'X 36"								
System Types:								
Wastes Previously Managed in Unit: 900100								

---

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Attachment  
4**

**FACILITY DOCUMENTATION**

**INTERNATIONAL GALVANIZERS**

**JUNE 22 – JULY 2, 2010**

**CEI LQG**

**INVESTIGATION # 828170**

**EPA ID# TXD050293794**

**TCEQ ID# 30568**

## **ATTACHMENT 4 FACILITY DOCUMENTATION**

### CONTENTS:

1. Pollution Prevention Plan
2. Financial Assurance
3. Waste Classification
4. Annual Waste Stream
5. Hazardous Waste Tank Inspection Records
6. Facility Correspondence; NOR Update
7. QUAD Neutralization

# Pollution Prevention Plan

# International Galvanizers

## Pollution Prevention Plan and Executive Summary

Plan Start Date: 12/20/2007

Plan End Date: 12/20/2011

### Facility Information

Contact Name	Frank Gaudet, PE
Company	International Galvanizers Partnership, Ltd
Facility	International Galvanizers
TNRCC Solid Waste ID	30568
TRI ID	77705NTRNT500IN
EPA ID	TXD050293794
Facility Address	5898 Industry Rd
Facility City	Beaumont
Facility State	TX
Facility Zip	77705
Mailing Address	1300 S. University, #200
Mailing City	Ft. Worth
Mailing State	TX
Mailing Zip	76107
Contact Phone	817 810 0095 extension – 120
Contact Fax	817-336-5354
email	<a href="mailto:frankgaudet@azz.com">frankgaudet@azz.com</a>
URL	<a href="http://azz.com">azz.com</a>

### Facility Description

Metal Coating-Galvanizing

Primary SIC	3679
Secondary SIC	
Tertiary SIC	
NAICS	332812

## List of Hazardous Wastes and TRI Chemicals

### Hazardous

Spent Acid from Pickling Process  
Tank Bottom Sludge

### TRI:

Zinc, 141,750 lbs released  
Lead, 77 lbs released.

These amounts do not include recycled zinc or lead.

## Activities and the Wastes Generated

### Activity Name: Galvanizing

#### Materials (wastes) from this activity:

Spent Acid	3,464,500 lbs
Tank Bottoms and Preflux Filter Cake	68,805 lbs

## Options for Reducing Waste

### Spent Acid Treatment

On-site processes are commercially available to cleanse the acid by removing the iron, and zinc impurities which inhibit the effectiveness of the acid. The cleansed acid can be returned to service instead of sent for disposal. There are two methods used for sulfuric acid. The Beta method crystallizes the impurities as sulfates by chilling the acid solution. Another method precipitates the metals with a silicate precipitant that functions in acidic conditions.

### New Diesel Forklifts

The facility uses diesel powered forklifts to carry steel around the yard and into the galvanizing building. Newer diesel engines are significantly cleaner than engines manufactured more than 5 years ago and the facility will reduce air emissions if forklifts are replaced with new models. Aztec participates in the TCEQ's TERP program which provides grant funding to assist with the purchase of replacement equipment.



## **Goals Information**

### **Employee Awareness**

Employees are presented with informal training on waste minimization techniques.

### **Economic and Technical**

There are two feasible methods for cleaning the acid, but all are capital and labor expensive. The Beta system lowers the acid temperature and drops zinc and iron sulfates. The precipitant method uses a silicate to precipitate iron and zinc. Both methods require equipment and operators.

### **Goals**

1. Generation of spent acid is a function of plant production. In CY 2006 the plant generated 3,484,500 lbs of spent acid while producing 16,606 tons of galvanized steel. The generation rate is 177 lbs of spent acid per ton of galvanized steel. Our goal is to reduce this by 15% and generate only 150 lbs per ton by the goal year of 2011.
2. Replace one forklift by Dec 31, 2008 and a second by Dec 31, 2010.

### **Potential Media Transfer**

Acid treatment yields a solid waste instead of a liquid waste.

### **Implementation Schedule**

Complete all projects by the end of the 5 year period.

### **Milestones**

Evaluate acid treatment methods by Dec 31, 2009 and demonstrate effectiveness with a small scale treatment system.

### **Environmental Effects**

1. Reducing the amount of waste generated and disposed also limits the possibility of environmental impairment.
2. Reduced air emissions improve air quality in the area.

## Certificate of Completeness and Correctness

This document certifies that the Pollution Prevention Plan has been completed and meets the specified requirements of the Waste Reduction Policy Act of 1991, the Solid Waste Disposal Act and 30 TAC §§335.471-335.480, and that the information provided herein is true, correct, and complete.

This document also certifies that the person whose signature appears below has the authority to commit the corporate resources necessary to implement this plan.

Name Tim Pendley

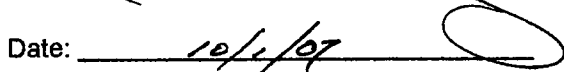
Title Vice President, Galvanizing Division

Position (check one): L Facility Owner  Corporate Officer

Signature



Date:



### Mail the form to:

Executive Summary  
Industrial Pollution Prevention Team MC112  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin, TX 78711-3087

# Financial Assurance

# ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
3/1/2010

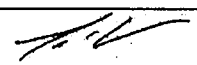
<b>PRODUCER</b> Hub International Rigg 777 Main Street, Suite C-50 Fort Worth TX 76102 (817) 820-8100 (817) 870-0310	THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
	<b>INSURERS AFFORDING COVERAGE</b>	<b>NAIC #</b>
<b>INSURED</b> AZZ incorporated  3100 W. 7th Street, Suite 500 Fort Worth TX 76107	INSURER A: Ironshore Specialty Ins. Co.	25445
	INSURER B: Sentry Insurance A Mutual Co	24988
	INSURER C: Axis Surplus Insurance Co	26620
	INSURER D: Beazley Insurance Co, Inc	37540
	INSURER E:	

**COVERAGES**

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADDL LTR	INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A		GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Contractual Liab  GEN'L AGGREGATE LIMIT APPLIES PER <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	000154200 Blanket Addl Ins'd & Waiver per contract	3/1/2010	3/1/2011	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 150,000 MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B		AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS	90-05719-05 Blanket Addl Ins'd & Waiver per contract	3/1/2010	3/1/2011	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
		GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY. EA ACC \$ AGG \$
C		EXCESSUMBRELLA LIABILITY <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE  <input type="checkbox"/> DEDUCTIBLE <input checked="" type="checkbox"/> RETENTION \$ 10,000	EA0731754/01/2010 Follow Form	3/1/2010	3/1/2011	EACH OCCURRENCE \$ 15,000,000 AGGREGATE \$ 15,000,000 \$ \$ \$
B		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	90-05719-08 Waiver per contract	3/1/2010	3/1/2011	<input checked="" type="checkbox"/> WC STATU-TORY LIMITS <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
D		OTHER Property including \$1,000,000 Transit	V15S6V10P "All Risk" Coverage	3/1/2010	3/1/2011	Blanket Real and Personal Property Limit: \$150,000,000 Rented or Leased Equipment: \$5,200,000 Limit any one item

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS  
 -SEE ATTACHED FOR COMPLETE LIST OF NAMED INSURED

<b>CERTIFICATE HOLDER</b>  **TO WHOM IT MAY CONCERN**	<b>CANCELLATION</b> SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES. AUTHORIZED REPRESENTATIVE 
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## IMPORTANT

If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

## DISCLAIMER

The Certificate of Insurance on the reverse side of this form does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

# Waste Classification

# AZTEC MANUFACTURING CO.

## Memorandum

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**DATE:** 01/15/01

**TO:** Files: INTERNATIONAL GALVANIZERS

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** Spent Acid, Classification of Wastes, 0008103H

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The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are laid in the yard area of the plant while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next, the pieces are dipped into a sulfuric acid bath (10-18%) for rust removal (pickling). Another acid tank is used for stripping the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The galvanized pieces are stored outside of the plant while they await pick-up by the customer.

The spent acid waste derives from the acid tanks in the process. Concentrated sulfuric acid (98%) is diluted to make-up a 15% solution in the pickling tank. Small quantities (<1%) of other chemicals are added to enhance the operation of the acid. These chemicals may include a foaming agent and a metal chelating agent.

The acid loses its effectiveness as iron and zinc chlorides dissolve in the acid during operation. When the iron content reaches 10% the acid is used for stripping zinc from re-processed parts. When the acid content falls to 8% the acid is regarded as a waste. The plant calls for a tanker truck from the disposal facility to pump out the acid. The acid is removed directly from the process tank and there is

01/15/01  
15-01.doc

Spent Acid Waste Determination 1104H, 1-

no hazardous waste storage facility for the acid. Currently, the plant uses the DSI deepwell in Houston for disposal services. During pumping, the waste is filtered to remove sludges and suspended particulates that are considered surcharge material at DSI. The filters and filtered materials are disposed off-site separate from the spent acid.

The spent acid is characteristically hazardous because the pH is less than 2.0 and because the acid contains chromium, cadmium, and lead above the TCLP criteria. Supporting laboratory reports are attached.

The metal contaminants derive from the stripped zinc coating. The zinc bars, used in galvanizing, contain trace amounts of cadmium and lead. The chromium is a thin coating applied to the galvanized piece in the quench tank. An MSDS for the zinc bars is attached. At one time selenium was found in the acid.

The spent acid is not a listed waste because it does not match any of the listed wastes in 40CFR 261.31. The listing K062 for acid wastes applies only to steel manufacturing and not to galvanizing (see attached memo dated June 1998).

Attachments:

1. Waste Classification Checklist
2. Process Flow Schematic
3. Disposal Systems Recertification Document 9/2/98
4. Analysis Results, 4/16/90
5. *MSDS - Sulfuric Acid*



# WASTE CLASSIFICATION CHECKLIST

Generator: **INTERNATIONAL GALANIZERS**

Name of Waste: **SPENT SULFURIC ACID**

Waste Code Number: **0008 104 H**

## Part I. Hazardous Waste Determination

Is the waste a listed hazardous waste, mixed with a listed hazardous waste, or derived from a listed hazardous waste?

NO

Is the waste ignitable per 40 CFR §261.21? (Flash cup test < 140° F)

NO

Is the waste corrosive per 40 CFR §261.22? (pH <2,0 or >12.5)

YES

Is the waste reactive per 40 CFR §261.23? (Cyanide < 250 ppm Sulfide < 500 ppm)

NO

Is the waste toxic per 40 CFR §261.24? (A waste is toxic for any constituent which leaches at or greater than the regulatory level set by EPA when the waste is subjected to the Toxicity Characteristic Leachate Procedure (TCLP) as described in EPA Method 1311 (SW-846).)

YES

D006

D007

D010 D008

If the answer to any of the preceding questions in this Part is "yes", then the waste is hazardous. If it is hazardous, it cannot be classified as nonhazardous waste. If the answers are "no" to all of the preceding questions and the waste is an industrial waste, then proceed to Part II.

## Part II. Class 1 and Class 2 Waste Determination

If the answer to any of the following non-numbered questions in this Part is "yes", then non-hazardous, industrial waste is a Class 1 waste. If all the answers to the following non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?

NO

Are any of the answers to questions (1) or (2) below "NO"?

NO

If the waste is a container, greater than 5 gallons in holding capacity, which has held a Hazardous Substance, a hazardous waste, a Class 1 waste, answer questions (1) and (2). If not, proceed to the next non-numbered question.

(1) Has the container had all its residues removed? ≤ Yes ≤ No

NO

(2) Has the container been rendered unusable? ≤ Yes ≤ No

NO

Does the waste contain asbestos material identified as Regulated Asbestos Containing Material (RACM) as defined in 40 CFR Part 61?

NO

Is the waste contaminated by a material which originally contained greater than or equal to 50 parts per million total polychlorinated biphenyls (PCBs)?

NO

Does the waste contain greater than or equal to 50 ppm PCBs?

NO

Are the answers to **BOTH** of the numbered questions below "yes"? (If one, or both, of the answers to the questions below is/are "no", enter "no" for this question.)

NO

(1) Is your waste specifically identified as a petroleum substance or as contaminated with a material identified as a petroleum substance? ≤ Yes ' No

(2) Does the waste contain greater than 1500 parts per million (ppm) TPH? ≤ Yes ' No

Is the waste from the production of a "new chemical substance"?

 NO

Is the waste generated outside the state of Texas?

 NO

If the waste is a liquid, does it have a flash point of less than 65.6 degrees C (150° F)?

 NO

Is the waste a solid or semi-solid which is liable to cause fires or can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

 NO

Is the waste a semi-solid which, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution having a pH less than or equal to 12.5?

 NO

Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)?

 NO

Is information lacking which demonstrates that the waste is a Class 2 or Class 3 waste?

 NO

If the answer to any of the preceding non-numbered questions in this Part is "yes", then the nonhazardous, industrial waste is a Class 1 waste. If all the answers to the preceding non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

If the answers are "no" to *all* of the preceding non-numbered questions of this Part and the industrial generator wishes to evaluate the waste for a possible Class 3 classification, then proceed to Part III. If not, stop here.

### Part III. Class 3 Waste Determination

If the answer to any of the following questions in Part III A is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.

Is the waste an empty container?

 NO

Is the waste a medical waste regulated under the 30 AC Chapter 330 Subchapter Y?

 NO

When submitted to the 7-Day Distilled Water Leachate Test, does the waste leach constituents at or above the Maximum Contaminant Levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R?

 NO

When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels?

 NO

Does the waste contain detectable levels of petroleum hydrocarbons?

 NO

Does the waste contain detectable levels of polychlorinated biphenyls (PCBs)?

 NO

Is the waste readily decomposable?

 NO

If the answer to any of the preceding questions of Part III is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste. If all the answers to the preceding questions are "no", then proceed.

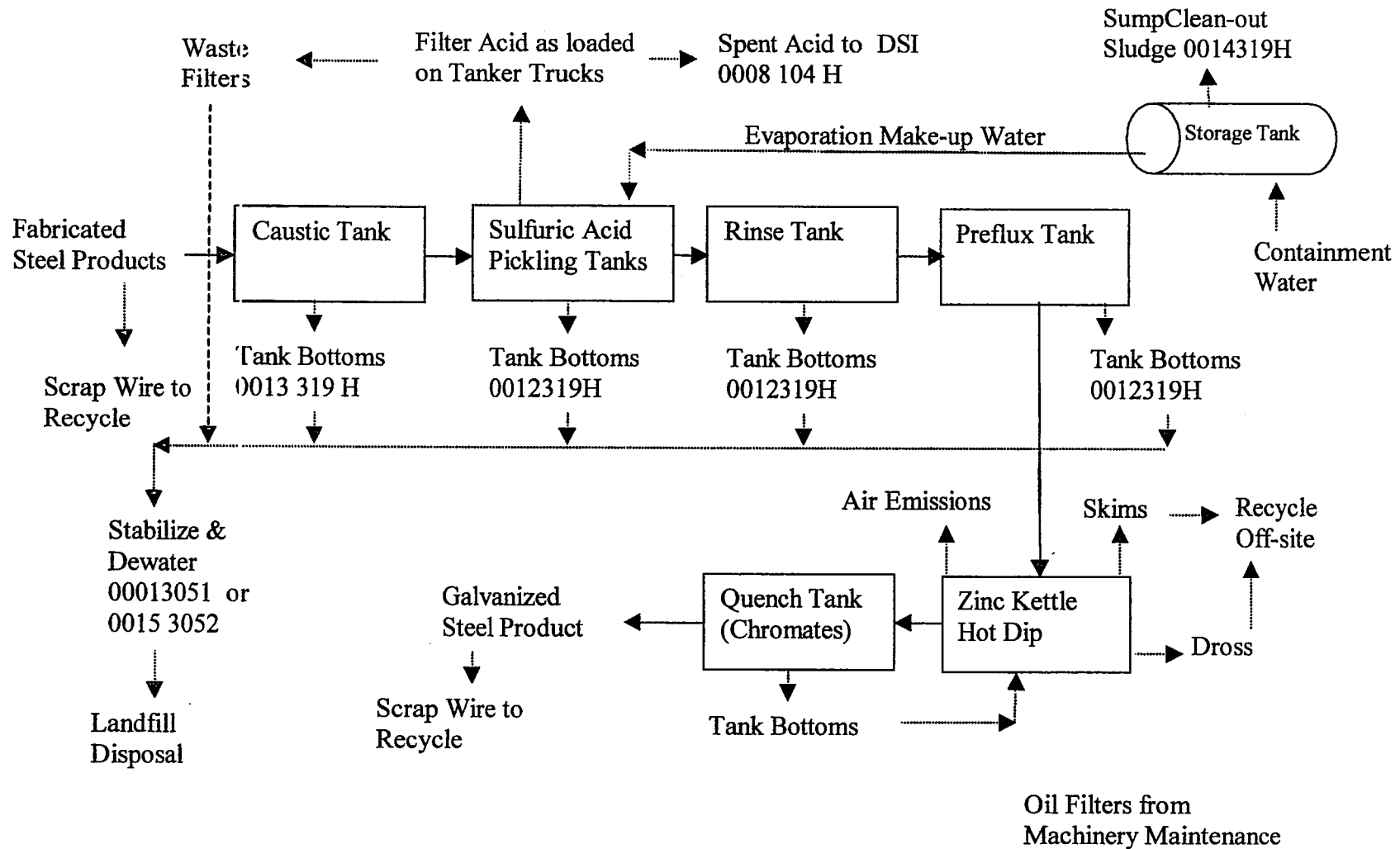
Is the waste inert? (Inertness refers to chemical inactivity of an element, compound, or a waste.)

 NO

Is the waste essentially insoluble?

 NO

If the answer to either question is "no", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.



**PRODUCTION PROCESS AND WASTES GENERATED  
INTERNATIONAL GALVANIZERS**

Disposal Systems, Inc.  
2525 Battleground Road  
Deer Park, TX 77536

**RECERTIFICATION DOCUMENT**

**COMPANY**  
HOUSTON INDUSTRIES ENVIR.  
P.O. BOX 5317  
GALVESTON TX 77554  
ATTN: GENE VERNER  
PHONE: 409 737 5989

**GENERATOR**  
INTERNATIONAL GALVANIZERS, INC  
IH 10 WEST SMITH RD EXIT  
BEAUMONT, TX 77720  
24 HR. CONTACT: LORI HOGGINS  
24 HR. PHONE: 409- 8420216

**WASTE DESCRIPTION:** WST. SULFURIC ACID  
**WASTE GENERATING PROCESS:** STEEL PICKEL OPERATION  
**U.S. EPA I.D. NUMBER:** TXD050293794  
**TEXAS GENERATOR NUMBER:** 30568  
**T.N.R.C.C. NUMBER:** 0008104H

**WASTE STREAM NUMBER:** 11404010  
**HANDLING CODE:** D79/M134  
**EPA HAZARDOUS WASTE CODE(S):**  
D002 D006 D007 D008 D010

**WASTE PROPERTIES (APPROVED RANGES)**

PH RANGE: 0 TO 2.00  
SPECIFIC GRAVITY: 1.0561 TO 1.2561  
PERCENT SOLIDS: 2.0  
PERCENT ORGANICS: 2.0  
APPEARANCE: GREEN  
ODOR: ACID  
FLASH POINT: 140

**FOR FUEL STREAMS ONLY (APPROVED RANGES)**

CHLORIDES: 0  
ASH: 0  
WATER: 0  
SULFIDES: 0  
CYANIDES: 0  
HEATING VALUE: 0

**TOP TEN COMPONENTS (RANGE IN %)**

	LOW	HIGH	CAS NO	AVG
SULFURIC ACID	5.000000	10.000000		
WATER	90.000000	95.000000		
	0	0		
	0	0		
	0	0		
	0	0		
	0	0		
	0	0		
	0	0		
	0	0		

**METALS CONCENTRATION  
TCLP IN PPM**

ARSENIC	3.40	NICKEL	59.60
BARIUM	0	SELENIUM	5.30
CHROMIUM	11.00	SILVER	0.5
CADMIUM	2.55	THALLIUM	1.5
COPPER	0	ZINC	0
LEAD	7.20		
MANGANESE	0		
MERCURY	0		

**PROPER DOT SHIPPING INFORMATION:**

RQ WASTE SULFURIC ACID, SPENT, 8, UN1832,  
PG II (CHROME, LEAD)  
TANK TRUCK

**METHOD OF SHIPMENT:**

**LAND DISPOSAL RESTRICTION NOTIFICATION INFORMATION:**

EPA CODE	WW/NW	SUBCATEGORY	TREATMENT
D002	NW	CWA/SDWA	D3
D006	NW	CWA/SDWA	D3
D007	NW	CWA/SDWA	D3
D008	NW	CWA/SDWA	D3
D010	NW	CWA/SDWA	D3

**DRY WEIGHT FACTOR:** FOR DEEPWELL STREAMS. YOUR CURRENT DRY WEIGHT FACTOR IS LISTED AS .2372 FOR THIS STREAM. IF THIS HAS CHANGED PLEASE PROVIDE UPDATED FACTOR: \_\_\_\_\_

**CERTIFICATION:** I HEREBY WARRANT THAT THE INFORMATION SUPPLIED ON THIS FORM REPRESENTS AN ACCURATE DESCRIPTION OF THIS WASTE MATERIAL. I FURTHER WARRANT THAT THE DESCRIPTION IS BASED ON ANALYSIS OF A REPRESENTATIVE SAMPLE EVALUATED IN ACCORDANCE WITH THE PROCEDURES APPROVED BY THE U.S. EPA OR BY APPLICATION OF KNOWLEDGE OF THE PROCESS GENERATING THE WASTE MATERIAL.

SIGNATURE Paul Verner TITLE Agent DATE 9/2/98



ENVIRONMENTAL MANAGEMENT SERVICES  
P.O. BOX 731  
FRESNO, TEXAS 77545  
ATTENTION: MR. PAUL HAMILTON

DATE: 04/16/90  
INVOICE #: 16323  
CERTIFICATE #: 50726  
P.O. #: NONE

SAMPLE DESCRIPTION: SULFURIC ACID  
SAMPLE LOCATION: INTERNATIONAL GALVANIZING  
PHYSICAL STATE: WATER

SAMPLED BY: F. HAMILTON  
DATE OF SAMPLE: NI TIME SAMPLED: NI  
DATE RECEIVED: 04/02/90

ANALYSIS/METHOD	RESULTS	UNITS	A-DATE P-DATE	A-TIME P-TIME	A-INIT P-INIT	SAMPLE DUPL	REC %
ARSENIC/EP TOX METHOD 206.3/7061-1310 DETECTION LIMIT 0.002	3.4	MG/L	04/13 04/02	1300 1100	MZ EB	0.50 0.49	97
BARIUM/EP TOX METHOD 208.1/7080-1310 DETECTION LIMIT 0.1	ND	MG/L	04/10 04/02	1000 1500	EB EB	ND ND	95
CADMIUM/EP TOX METHOD 213.1/7030-1310 DETECTION LIMIT 0.005	2.55	MG/L	04/06 04/02	1045 1500	EB EB	ND ND	97
CHROMIUM/EP TOX METHOD 218.1/7190-1310 DETECTION LIMIT 0.05	11.0	MG/L	04/04 04/02	1515 1500	EB EB	ND ND	96
LEAD/EP TOX METHOD 239.1/7420-1310 DETECTION LIMIT 0.1	7.2	MG/L	04/04 04/02	1030 1500	EB EB	ND ND	99
MERCURY/EP TOX METHOD 245.1/7471-1310 DETECTION LIMIT 0.0002	ND	MG/L	04/13 04/02	1500 1100	MZ MZ	ND ND	97
NICKEL/EP TOX METHOD 249.1 DETECTION LIMIT 0.04	59.6	MG/L	04/06 04/02	1515 1500	EB EB	ND ND	98
SELENIUM/EP TOX METHOD 270.3/7741-1310 DETECTION LIMIT 0.002	ND	MG/L	04/13 04/02	1300 1100	MZ MZ	ND ND	96

PAGE TWO

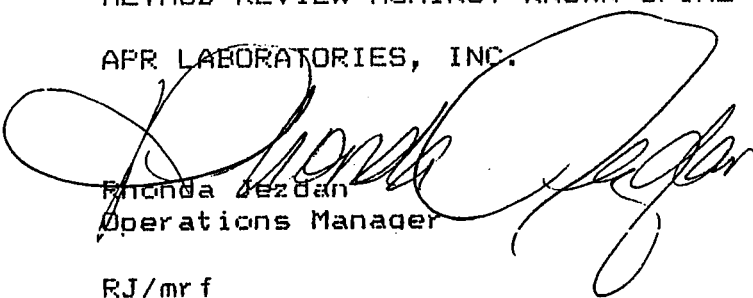
CERTIFICATE NUMBER: 50726

ANALYSIS/METHOD	RESULTS	UNITS	A-DATE P-DATE	A-TIME P-TIME	A-INIT P-INIT	SAMPLE DUPL	REC %
SILVER/EP TOX	0.50	MG/L	04/05	1115	EB	ND	99
METHOD 272.1/7760-1310			04/02	1500	EB	ND	
DETECTION LIMIT 0.01		MG/L					
THALLIUM/EP TOX	1.5	MG/L	04/10	1500	EB	ND	89
METHOD 279.1			04/02	1500	EB	ND	
DETECTION LIMIT 0.1		MG/L					

NOTE: A = ANALYSIS  
P = PREPARATION  
NI = NOT INDICATED  
N/A = NOT APPLICABLE  
ND = NOT DETECTED

QUALITY ASSURANCE: THESE ANALYSES ARE PERFORMED IN ACCORDANCE WITH EPA GUIDELINES FOR QUALITY ASSURANCE. THESE PROCEDURES INCLUDE THE FOLLOWING AS MINIMUM REQUIREMENTS: COMPARISONS AGAINST KNOWN STANDARDS IN EACH RUN, ONE IN TEN SAMPLE SPLITS, AND A QUARTERLY METHOD REVIEW AGAINST KNOWN SPIKE SAMPLES.

APR LABORATORIES, INC.

  
Rhonda DeZuan  
Operations Manager

RJ/mr f

\*\*\*\*\*  
\*\*\*\*\*  
\*\*\*\*\* MATERIAL SAFETY DATA SHEET \*\*\*\*\*  
\*\*\*\*\*  
\*\*\*\*\*

MANUFACTURED BY:  
INTERNATIONAL GALVANIZERS, INC.  
500 INDUSTRIAL ROAD  
BEAUMONT, TEXAS 77705

EMERGENCY TELEPHONE  
( 409 ) 842 0216  
DATE 9/15/91

DISPOSAL SITE WASTESTREAM NO. 11404010

SECTION I PRODUCT IDENTIFICATION

CHEMICAL NAME: SPENT SULFURIC ACID MIXTURE  
SYNONYMS: OIL OF VITROL  
CHEMICAL FAMILY: INORGANIC ACID  
FORMULA: H2SO4  
INGREDIENTS

	CAS #	PERCENT
SULFURIC ACID	7664-93-9	5 - 10
WATER	N/A	90 - 95

SECTION II PHYSICAL DATA

BOILING POINT: 518 - 664 F  
VAPOR PRESSURE 46 C (psia): LOW  
SOLUBILITY IN WATER: COMPLETE  
VAPOR DENSITY: < 3.4  
FREEZING POINT: < 50 F  
SPECIFIC GRAVITY: < 1.5

SECTION III FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (F): NON FLAMMABLE  
FLAMMABLE LIMITS: NON FLAMMABLE  
AUTOIGNITION TEMP.(F): NON FLAMMABLE  
EXTINGUISHING AGENT: NON FLAMMABLE

SPECIAL FIRE PROCEDURES: DO NOT USE WATER to put out fire.  
Use foam and wear protective clothing  
and respiratory protection.

UNUSAL FIRE AND EXPLOSION HAZARDS:  
Fires involving small amount of combustibles may be smothered  
with suitable dry chemical. Addition of water can cause heat  
reaction.

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SECTION IV HEALTH HAZARDS DATA

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HEALTH HAZARD RATING: 2 - 4 - 2  
ODOR THRESHOLD: > 1 mg/m<sup>3</sup>  
PERMISSIBLE EXPOSURE LIMIT: 1 mg/m<sup>3</sup>/10 hr TW  
SKIN CONTACT: Liquid causes severe burns with destruction  
of tissue.  
EYE CONTACT: Vapors very irritating  
INGESTION: Harmful if swallowed  
INHALATION: Vapors very irritating

---

SECTION V FIRST AID PROCEDURES

---

SKIN: Immediately flush with water, remove contaminated  
clothing. See physician.  
EYE: Immediately wash eyes with large amounts of water  
occasionally lifting upper and lower lids.  
INGESTION: NO VOMIT. Give milk or water to dilute. See  
physician.  
INHALATION: Move person to fresh air. See physician.

---

SECTION VI REACTIVITY DATA

---

STABILITY   X   STABLE        UNSTABLE  
INCOMPATIBILITIES: Peroxides, oxides of phosphorus, organics  
water, carbides, chlorates, fulminates, nitrates, picrates,  
poisoned metals and other combustibles.  
HAZARDOUS DECOMPOSITION: Unknown  
HAZARDOUS POLYMERIZATION: Unknown

---

SECTION VII SPILL AND LEAK PROCEDURES

---

Using full protective apparatus cover spill with sodium  
bicarbonate or soda ash-slaked lime (50/50). Mix and add water  
to form a slurry. Scoop up slurry and place in drums for  
proper disposal.

---

SECTION VIII SPECIAL PROTECTIVE EQUIPMENT

---

SKIN: Protective rubber gloves, boots and apron  
EYES: Full face shield  
RESPIRATORY PROTECTION: Use NIOSH approved respiratory  
protection.

---



SECTION IX SHIPPING AND REGULATORY INFORMATION

DOT SHIPPING NAME: Waste Sulfuric Acid Solution  
DOT HAZARD CLASS: Corrosive Liquid DOT LABELS: Corrosive  
UN/NA NUMBER: UN 1832 PLACARDS: Corrosive Liq.  
EPA HAZARDOUS WASTE CODES: D002  
NFPA/HMIS CLASSIFICATION:  
FLAM- 2 REACT - 4 HEALTH - 2

SECTION X REMARKS

\*\*\*\*\*

The information contained herein is based on both literature and process knowledge.

- 1) "Chemical Data Guide for Bulk Shipment by Water"  
U.S. Department of Transportation, U.S. Coast Guard
- 2) "Chemical Hazards", U.S. Department of Labor, NIOSH/  
OSHA.
- 3) "Fire Protection Guide on Hazardous Materials"  
National Fire Protection Association.

Based on the above available literature and process knowledge, we believe this MSDS to be correct. However, we do not make any warranty, expressed or implied regarding the accuracy of this data.  
to be

This MSDS has been prepared by Paul Hamilton, Environmental Management Services, P.O. Box 731, Fresno, Texas 77545.

Reviewed and approved by:

Name: RALPH W. BOOKER SR.  
Company: INTERNATIONAL GALVANIZERS, INC.  
Title: PLANT COORDINATOR

Signature

*Ralph W. Booker Sr.*

Date 9/15/91

# **AZZ incorporated**

## *Memorandum*

---

**DATE:** 03/27/2003

**TO:** Files: INTERNATIONAL GALANIZERS

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** Cake from Preflux Filter Press Waste Number 0010 319 2

---

### **Process**

The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are laid in the yard area while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next the pieces are dipped into an acid tank for rust removal (pickling). Another acid tank is used for removing the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The quench tank contains a dilute solution of chromic acid to place a seal on the galvanized piece. The galvanized pieces are stored outside on the south side of the plant while they await pick-up by the customer.

The solution in the 10,730 gallon preflux tank is circulated through a plate and frame filter press to remove particulates that formed in the solution. The filter press is piped to the preflux tank and a diaphragm pump circulates the solution.

03/27/03

# WASTE CLASSIFICATION CHECKLIST

Generator: International Galvanizers, Inc

Name of Waste: CAKE FROM PREFLUX FILTER PRESS Waste Code Number: 0010 319 2

## Part I. Hazardous Waste Determination

IF the answer to any of the questions in Part I is "Yes", THEN the waste is hazardous.

### Part I-A. Listed Hazardous Waste Determination

The EPA lists some 400 hazardous wastes.

#### Information to Help You Make This Determination

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31-33. These wastes are often referred to as follows:

- "F" listed waste (waste from nonspecific sources, Section 361.31;
- "K" listed waste (wastes from specific sources, Section 261.32;
- "P" listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33;
- "U" listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33.

QUESTION: Is the waste a listed hazardous waste, or is it mixed with or derived from one?

Yes  No

### Part I-B. Characteristic Hazardous Waste Determination

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

#### Information to Help You Make This Determination

##### Ignitability

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24% alcohol by volume) that have a closed-cup flash point less than 60° C (140° F).
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

QUESTION: Is the waste ignitable per 40 CFR §261.21?

Yes  No

##### Corrosiveness

Wastes that are hazardous because they are corrosive include the following:

- Aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- Liquid wastes that corrode steel at a rate rather than 6.35 mm (0.250 inches) per year.

QUESTION: Is the waste corrosive per 40 CFR Section 261.22?

Yes  No

##### Reactivity

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction
  - ✓ At standard temperature and pressure,
  - ✓ If subjected to a strong ignition source, or

## Review of Checklist Part I – Hazardous Waste

IF the answer to any of the preceding questions is Part I is "Yes",  
THEN the waste is HAZARDOUS.

IF the answers are "No" to all the preceding questions,  
AND the waste is NON-INDUSTRIAL,  
THEN STOP here.

IF the answers are "No" to all of the preceding questions,  
AND the waste is INDUSTRIAL,  
THEN PROCEED to Part II.

---

## Part II. Nonhazardous Industrial Waste Classes 1 and 2

The determination in this part of the checklist applies only to nonhazardous industrial waste. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505-06 and 335.508).

IF the answer to any of the **un-numbered** questions in this part of the checklist is "Yes,"  
THEN the nonhazardous industrial waste is Class 1 waste.

IF all the answers to the **un-numbered** questions in this part are "No,"  
THEN the industrial waste is a Class 2 waste.

### Generator's Self-Classification

QUESTION: Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?

Yes  No

### Container Waste

IF the waste is a container, greater than 5 gallons in holding capacity, which has held  
✓ a hazardous substance (as defined in 40 CFR Part 302)  
✓ a hazardous waste (including acutely hazardous wastes),  
✓ a Class 1 waste, and/or  
✓ a material that would be classified as a hazardous or Class 1 waste if disposed of,

THEN answer questions 1 and 2. (Please note that containers that have held acutely hazardous wastes must be triple rinsed before they can be classified as empty.)

IF these conditions are not present in your situation,  
THEN proceed to the next un-numbered question.

(1) Has the container had all its residues removed?  Yes  No

(2) Has the container been rendered unusable?  Yes  No

QUESTION: Are any of the answers to questions (1) or (2) above "NO"?

Yes  No

### Regulated Asbestos-Containing Material (RACM)

QUESTION: Does the waste contain asbestos material identified as (RACM) as defined in 40 CFR Part 61?

Yes  No

### Polychlorinated Biphenyls (PCBs)

QUESTION: Is the waste contaminated by a material that originally contained 50 ppm or more of

the nonhazardous, industrial waste is a Class 1 waste.

IF the answers are "No" to all the preceding un-numbered questions in Part II,  
the industrial waste is a Class 2 waste.

IF the answers are "No" to *all* of the preceding un-numbered questions in Part II  
AND the industrial generator wishes to evaluate the waste for a possible Class 3 classification,  
THEN PROCEED to Part III.

---

## PART III. Nonhazardous Industrial Class 3 Waste

This part of the checklist applies only to nonhazardous, industrial waste that does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste. (The corresponding regulations for this part of the checklist can be found at 30 TAC Sections 335.507 and 335.508.)

### Part III-A. Initial Determinations for Class 3 Status

IF the answer to any of the following questions in Part III-A is "Yes",  
THEN the nonhazardous, industrial waste *cannot* be considered a Class 3 waste.

#### Containers

QUESTION: Is the waste an empty container?

Yes  No

#### Medical Waste

QUESTION: Is the waste a medical waste regulated under the 30 AC Chapter 330 Subchapter Y?

Yes  No

#### Distilled Water Leaching Test

QUESTION: When submitted to the 7-Day Distilled water leaching test, does the waste leach constituents at or above the maximum contaminant levels of 30 TAC Chapter 335, Subchapter R?

Yes  No

#### Toxicity Characteristic Leaching Procedure

QUESTION: When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels?

Yes  No

*Exclusion:* Excluded from this list of Class 1 toxic constituents are those addressed in the previous question.

#### Petroleum Hydrocarbons

QUESTION: Does the waste contain detectable levels of petroleum hydrocarbons (Method 1005)?

Yes  No

#### Polychlorinated Biphenyls (PCBs)

QUESTION: Does the waste contain detectable levels of PCBs?

Yes  No

#### Decomposition

QUESTION: Is the waste readily decomposable?

Yes  No

Client: **International Galvanizer**  
P. O. Box 21677  
Beaumont, TX 77720

Report Date: 03/21/03  
Sample Matrix: Sludge  
Date Collected: 03/18/03  
Time Collected: 8:45am  
Collected By: Tony Phillips  
Date Analyzed: 03/20/03  
Analyst(s): KN  
Date Received: 03/18/03  
Time Received: 3:00pm  
CHEMTEX FILE #: P3030624

Attn: **Mr. Tony Phillips**

**RESULTS OF ANALYSIS**

Site Location: 5898 Industrial Rd., Beaumont, TX 77705

Sample Identification: Sludge

CHEMTEX #: P3030624

**TOXICITY CHARACTERISTICS LEACHING PROCEDURE CONSTITUENTS**

EPA HW#	CAS #	Constituents	Units	Results	MDL	RMCLL	EPA Method
<b>TCLP Metals</b>							
D004	7440-38-2	Arsenic	mg/l	< 0.05	0.05	5	1311/6010B
D005	7440-39-3	Barium	mg/l	0.4	0.2	100.0	1311/6010B
D006	7440-43-9	Cadmium	mg/l	< 0.05	0.05	1	1311/6010B
D007	7440-47-3	Chromium	mg/l	< 0.05	0.05	5	1311/6010B
D008	7439-92-1	Lead	mg/l	< 0.05	0.05	5	1311/6010B
D009	7440-97-5	Mercury	mg/l	< 0.02	0.02	0.2	1311/74707
D010	7782-49-2	Selenium	mg/l	< 0.05	0.05	1	1311/6010B
D011	7440-22-4	Silver	mg/l	< 0.05	0.05	5	1311/6010B

MDL: Method Detection Limit.

RMCLL: Regulatory Maximum Concentration of Contaminants in the TCLP Leachate.

**LABORATORY CONTROL MATRIX SPIKE RECOVERY**

EPA HW#	CAS #	Constituents	(%) Recovery
<b>TCLP Metals:</b>			
D004	7440-38-2	Arsenic	105
D005	7439-39-3	Barium	84
D006	7440-43-9	Cadmium	106
D007	7440-47-3	Chromium	110
D008	7439-92-1	Lead	108
D009	7440-97-5	Mercury	90
D010	7782-49-2	Selenium	107
D011	7440-22-4	Silver	99

*KCR Reddy*

*for*

Dr. C. N. Reddy, Ph.D., CIH, ASP  
Director

jlm/CNR

The analytical results, opinions or interpretations contained in this report are based upon information and material supplied by the client for whom analysis was conducted and confidential to the client. The analytical results, opinions or interpretations contained herein are based upon the best judgment of CHEMTECH, however, under no circumstances shall CHEMTECH be held liable for any errors or omissions, of any type, and expressly disclaims any liability for such errors or omissions, in whole or in part, arising out of the performance of CHEMTECH.

# AZTEC MANUFACTURING CO.

## Memorandum

---

**DATE:** 01/15/2001

**TO:** Files: INTERNATIONAL GALVANIZERS

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** Sulfuric Acid Tank Bottoms Cleanout, 0012 319H

---

The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant that are laid in the yard area while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next the pieces are dipped into an acid tank for rust removal (pickling). Another acid tank is used for removing the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The quench tank contains a dilute solution of chromic acid to place a seal on the galvanized metal. The galvanized pieces are stored outside while they await pick-up by the customer.

The rinse tank and acid tanks are periodically cleaned-out to remove tank bottom sludges and restore the liquid capacity of the tanks. The waste from the acid rinse tank is corrosive because the pH is less than 2.0. The sludge may contain leachable amounts of lead, chromium cadmium and selenium. These metals derive from the stripping of re-worked zinc pieces because the zinc coating contains trace amounts of metals.

The plant personnel remove the sludges by either draining the liquid from the tank and shoveling the sludges out or by using a dredge to remove the sludges without draining the tanks. The sludges are placed in 55-gallon drums, closed, labeled, and placed in the waste storage area ( #004).

The sludges are de-watered, neutralized and stabilized by an outside contractor (presently Quad B). This process removes the hazardous waste characteristics and allows the sludge to be disposed as a non-hazardous waste.

This waste is not a listed waste because it does not match any of the listed wastes in 40 CFR 261.31.

**Attachments:**

1. Waste Classification Checklist
2. Process Flow Schematic
3. Laboratory Analysis, Inchcape 3-2-94



# WASTE CLASSIFICATION CHECKLIST

\*

Generator: **INTERNATIONAL GALVANIZING**

Name of Waste: **Sulfuric Acid Process Tank Clean-out**

Waste Code Number: **0012 319 H**

## Part I. Hazardous Waste Determination

- Is the waste a listed hazardous waste, mixed with a listed hazardous waste, or derived from a listed hazardous waste?  NO
- Is the waste ignitable per 40 CFR §261.21? (Flash cup text < 140° F)  NO
- Is the waste corrosive per 40 CFR §261.22? (pH <2,0 or >12.5)  YES
- Is the waste reactive per 40 CFR §261.23? (Cyanide < 250 ppm Sulfide < 500 ppm)  NO
- Is the waste toxic per 40 CFR §261.24? (A waste is toxic for any constituent which leaches at or greater than the regulatory level set by EPA when the waste is subjected to the Toxicity Characteristic Leachate Procedure (TCLP) as described in EPA Method 1311 (SW-846).)  YES  
D007,  
D008

If the answer to any of the preceding questions in this Part is "yes", then the waste is hazardous. If it is hazardous, it cannot be classified as nonhazardous waste. If the answers are "no" to all of the preceding questions and the waste is an industrial waste, then proceed to Part II.

## Part II. Class 1 and Class 2 Waste Determination

If the answer to any of the following non-numbered questions in this Part is "yes", then non-hazardous, industrial waste is a Class 1 waste. If all the answers to the following non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

- Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?  NO
- Are any of the answers to questions (1) or (2) below "NO"?  NO
- If the waste is a container, greater than 5 gallons in holding capacity, which has held a Hazardous Substance, a hazardous waste, a Class 1 waste, answer questions (1) and (2). If not, proceed to the next non-numbered question.
- (1) Has the container had all its residues removed? ≤ Yes ≤ No  NO
- (2) Has the container been rendered unusable? ≤ Yes ≤ No  NO
- Does the waste contain asbestos material identified as Regulated Asbestos Containing Material (RACM) as defined in 40 CFR Part 61?  NO
- Is the waste contaminated by a material which originally contained greater than or equal to 50 parts per million total polychlorinated biphenyls (PCBs)?  NO
- Does the waste contain greater than or equal to 50 ppm PCBs?  NO
- Are the answers to **BOTH** of the numbered questions below "yes"? (If one, or both, of the answers to the questions below is/are "no", enter "no" for this question.)  NO
- (1) Is your waste specifically identified as a petroleum substance or as contaminated with a material identified as a petroleum substance? ≤ Yes ' No
- (2) Does the waste contain greater than 1500 parts per million (ppm) TPH? ≤ Yes ' No

Is the waste from the production of a "new chemical substance"?

 NO

Is the waste generated outside the state of Texas?

 NO

If the waste is a liquid, does it have a flash point of less than 65.6 degrees C (150° F)?

 NO

Is the waste a solid or semi-solid which is liable to cause fires or can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

 NO

Is the waste a semi-solid which, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution having a pH less than or equal to 12.5?

 NO

Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)?

 NO

Is information lacking which demonstrates that the waste is a Class 2 or Class 3 waste?

 NO

If the answer to any of the preceding non-numbered questions in this Part is "yes", then the nonhazardous, industrial waste is a Class 1 waste. If all the answers to the preceding non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

If the answers are "no" to *all* of the preceding non-numbered questions of this Part and the industrial generator wishes to evaluate the waste for a possible Class 3 classification, then proceed to Part III. If not, stop here.

### Part III. Class 3 Waste Determination

If the answer to any of the following questions in Part III A is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.

Is the waste an empty container?

 NO

Is the waste a medical waste regulated under the 30 AC Chapter 330 Subchapter Y?

 NO

When submitted to the 7-Day Distilled Water Leachate Test, does the waste leach constituents at or above the Maximum Contaminant Levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R?

 NO

When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels?

 NO

Does the waste contain detectable levels of petroleum hydrocarbons?

 NO

Does the waste contain detectable levels of polychlorinated biphenyls (PCBs)?

 NO

Is the waste readily decomposable?

 NO

If the answer to any of the preceding questions of Part III is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste. If all the answers to the preceding questions are "no", then proceed.

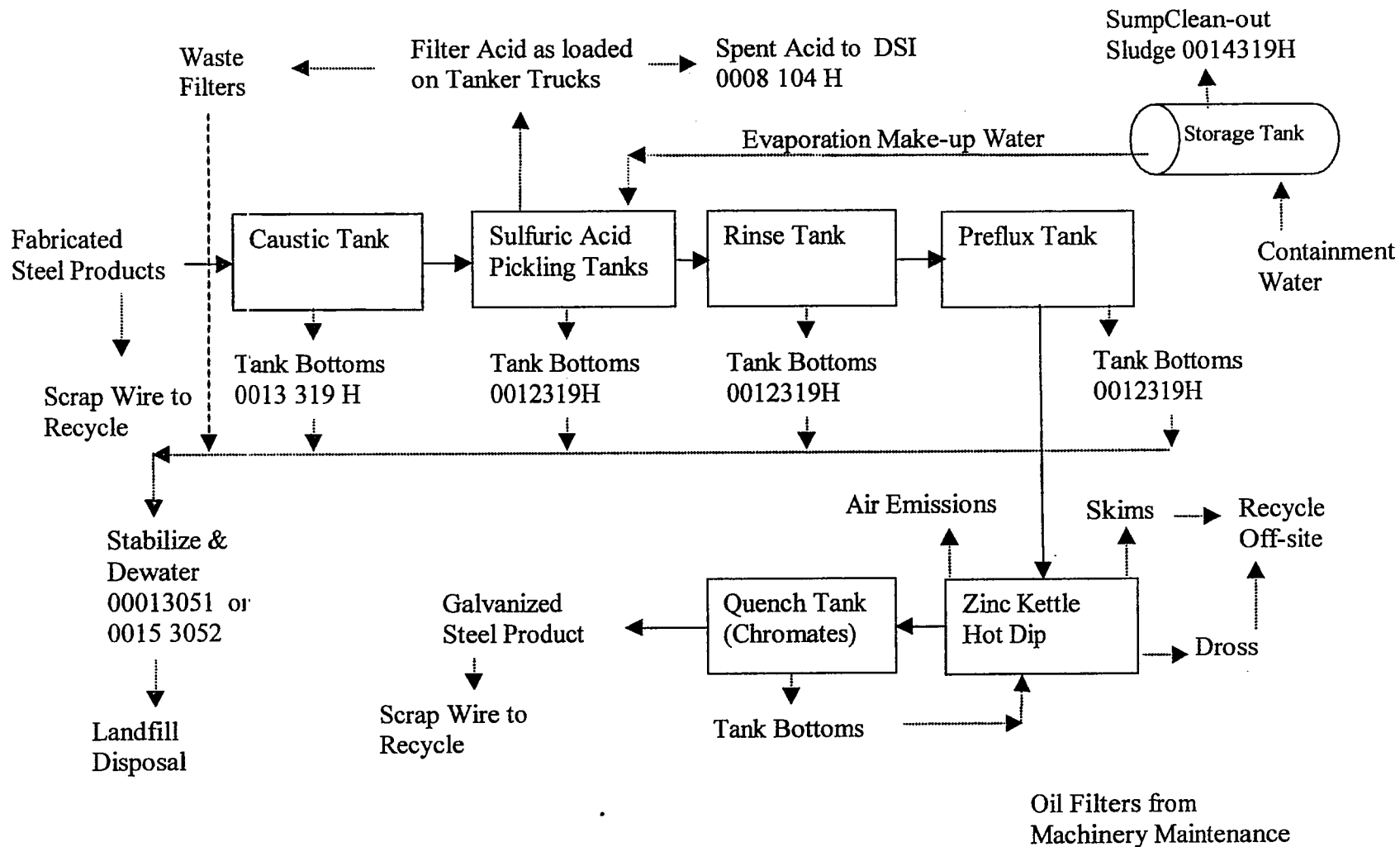
Is the waste inert? (Inertness refers to chemical inactivity of an element, compound, or a waste.)

 NO

Is the waste essentially insoluble?

 NO

If the answer to either question is "no", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.



**PRODUCTION PROCESS AND WASTES GENERATED  
INTERNATIONAL GALVANIZERS**



# Inchcape Testing Services

## NDRC Laboratories

11155 South Main  
Houston, TX 77025  
Tel. 713-661-8150  
Fax. 713-661-2661

DATE RECEIVED : 10-FEB-1994

REPORT NUMBER : H94-997-2  
REPORT DATE : 2-MAR-1994

SAMPLE SUBMITTED BY : Environmental Management Services  
ADDRESS : P.O. Box 731  
          : Fresno, TX 77545  
ATTENTION : Mr. Paul Hamilton

SAMPLE MATRIX : Liquid  
ID MARKS : Sulfuric Acid  
PROJECT : 940210/International Gal.  
DATE SAMPLED : 10-FEB-1994

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Silver	0.01 mg/L	0.12 mg/L
Arsenic	1.0 mg/L	< 1.0 mg/L
Barium	0.5 mg/L	< 0.5 mg/L
Cadmium	0.05 mg/L	4.86 mg/L
Chromium	0.250 mg/L	28.1 mg/L
Mercury	0.0002 mg/L	< 0.0002 mg/L
Lead	0.250 mg/L	7.78 mg/L
Selenium	1.0 mg/L	5.3 mg/L

Inchcape Testing Services

*Kuei-Mei Li*

Kuei-Mei Li  
Technical Director



409 842  
5016

Generator Name: International Galvanizer

EPA Hazardous Waste Codes: D008

Manifest Number: \_\_\_\_\_

Waste Profile Number: \_\_\_\_\_

This form is submitted in accordance with regulations published by the EPA in 40 CFR Part 268, which governs land disposal of certain wastes. The hazardous waste identified above is one of the "restricted" wastes identified in sections 268.30, 268.31, 268.32, or 268.33. In accordance with the recordkeeping requirements specified by EPA (268.7), I have marked the appropriate box below which indicates how my waste must be managed to conform to the land disposal regulations. By signing the form, I am making the required certification shown.

Waste analysis data attached: ( ) Yes ( ) No

**SECTION I: UNRESTRICTED WASTE**

(1) ( ) The waste identified above is non-hazardous or currently is not restricted by the USEPA according to CFR 268.

**SECTION II: REGULATORY CATEGORIZATION & TREATABILITY**

- A. Subcategory (for EPA codes listed above)
- B. Treatability group: ( ) Wastewater  Non-wastewater
- C. Treatment Standards:
  - ( ) 40 CFR 268.41 (Concentration in waste extract)
  - 40 CFR 268.42 (Technology standard) Technology Code: DEACT
  - ( ) 40 CFR 268.43 (Concentration in waste)
  - ( ) F-Solvent (include separate sheet with standards)
  - ( ) FO39 (include separate sheet with standards)
  - ( ) California waste
    - pH 0-2
    - HOC > 1000ppm
    - Thallium > 130ppm
    - PCB > 50ppm
    - Nickel > 134ppm
    - Cyanides > 1000ppm

**SECTION III: TREATMENT STATUS**

(2) ( ) **REQUIRES TREATMENT**  
The untreated waste identified above must be treated to the appropriate treatment standard set forth in 40 CFR 268, Subpart D, or 40 CFR 268.32 prior to land disposal.

(3) ( ) **MEETS TREATMENT STANDARDS**  
The untreated waste identified above has been tested and found to meet the applicable treatment standards. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, applicable, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

(4)  **TREATMENT TO MEET TREATMENT STANDARDS**  
The waste identified above has been treated in compliance with applicable treatment standards. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268, Subpart D, and applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

(5) ( ) **SUBJECT TO VARIANCE**  
The waste identified above is subject to:  
A.      a case-by-case extension under 40 CFR 268.5 (date waste is subject to prohibition     )  
B.      a nationwide variance (date waste is subject to prohibition     )  
C.      a no-migration petition under 40 CFR 268.6

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

\_\_\_\_\_  
Signature Title Date

# AZTEC MANUFACTURING CO.

## Memorandum

---

**DATE:** 01/15/2001

**TO:** Files: INTERNATIONAL GALVANIZERS

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** Caustic (Sodium Hydroxide) Tank Bottoms Cleanout, 0013 319H

---

The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a sodium hydroxide solution for the removal of grease and oil.

The caustic tank is periodically cleaned-out to remove tank bottom sludges and restore the liquid capacity of the tank. The sludges consist of dirt and precipitated caustic. The sludge is hazardous because it contains a solution of sodium hydroxide and the pH is greater than 12.5. This waste is not a listed waste because it does not match any of the listed wastes in 40 CFR 261.31.

The plant personnel remove the sludges by either draining the liquid from the tank and shoveling the sludges out or by using a dredge to remove the sludges without draining the tanks. The sludges are placed in 55-gallon drums, closed, labeled, and placed in the waste storage area ( #004). The sludges are de-watered, neutralized and stabilized by an outside contractor (presently Quad B). This process removes the hazardous characteristics and allows the sludge to be disposed as a non-hazardous waste.

**Attachments:**

1. Waste Classification Checklist
2. Process Flow Schematic
3. ~~Laboratory Analysis, Incheape 3-2-94~~

01/15/01

# WASTE CLASSIFICATION CHECKLIST

**Generator: INTERNATIONAL GALVANIZING**

**Name of Waste: Caustic Tank Bottom Clean-out**

**Waste Code Number: 0013 319 H**

## **Part I. Hazardous Waste Determination**

Is the waste a listed hazardous waste, mixed with a listed hazardous waste, or derived from a listed hazardous waste?  N

Is the waste ignitable per 40 CFR §261.21? (Flash cup test < 140° F)  N

Is the waste corrosive per 40 CFR §261.22? (pH < 2,0 or > 12.5)  YI

Is the waste reactive per 40 CFR §261.23? (Cyanide < 250 ppm Sulfide < 500 ppm)  N

Is the waste toxic per 40 CFR §261.24? (A waste is toxic for any constituent which leaches at or greater than the regulatory level set by EPA when the waste is subjected to the Toxicity Characteristic Leachate Procedure (TCLP) as described in EPA Method 1311 (SW-846).)  N

If the answer to any of the preceding questions in this Part is "yes", then the waste is hazardous. If it is hazardous, it cannot be classified as nonhazardous waste. If the answers are "no" to all of the preceding questions and the waste is an industrial waste, then proceed to Part II.

## **Part II. Class 1 and Class 2 Waste Determination**

If the answer to any of the following non-numbered questions in this Part is "yes", then non-hazardous, industrial waste is a Class 1 waste. If all the answers to the following non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?  N

Are any of the answers to questions (1) or (2) below "NO"?  N

If the waste is a container, greater than 5 gallons in holding capacity, which has held a Hazardous Substance, a hazardous waste, a Class 1 waste, answer questions (1) and (2). If not, proceed to the next non-numbered question.

(1) Has the container had all its residues removed? ≤ Yes ≤ No  N

(2) Has the container been rendered unusable? ≤ Yes ≤ No  N

Does the waste contain asbestos material identified as Regulated Asbestos Containing Material (RACM) as defined in 40 CFR Part 61?  N

Is the waste contaminated by a material which originally contained greater than or equal to 50 parts per million total polychlorinated biphenyls (PCBs)?  N

Does the waste contain greater than or equal to 50 ppm PCBs?  N

Are the answers to **BOTH** of the numbered questions below "yes"? (If one, or both, of the answers to the questions below is/are "no", enter "no" for this question.)  N

(1) Is your waste specifically identified as a petroleum substance or as contaminated with a material identified as a petroleum substance? ≤ Yes ' No

(2) Does the waste contain greater than 1500 parts per million (ppm) TPH? ≤ Yes ' No



Is the waste from the production of a "new chemical substance"?

Is the waste generated outside the state of Texas?

If the waste is a liquid, does it have a flash point of less than 65.6 degrees C (150° F)?

Is the waste a solid or semi-solid which is liable to cause fires or can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Is the waste a semi-solid which, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution having a pH less than or equal to 12.5?

Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)?

Is information lacking which demonstrates that the waste is a Class 2 or Class 3 waste?

If the answer to any of the preceding non-numbered questions in this Part is "yes", then the nonhazardous, industrial waste is a Class 1 waste. If all the answers to the preceding non-numbered questions in this Part are "no", then the industrial waste can be considered a Class 2 waste.

If the answers are "no" to *all* of the preceding non-numbered questions of this Part and the industrial generator wishes to evaluate the waste for a possible Class 3 classification, then proceed to Part III. If not, stop here.

### **Part III. Class 3 Waste Determination**

If the answer to any of the following questions in Part III A is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.

Is the waste an empty container?

Is the waste a medical waste regulated under the 30 AC Chapter 330 Subchapter Y?

When submitted to the 7-Day Distilled Water Leachate Test, does the waste leach constituents at or above the Maximum Contaminant Levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R?

When submitted to the Toxicity Characteristic Leaching Procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels?

Does the waste contain detectable levels of petroleum hydrocarbons?

Does the waste contain detectable levels of polychlorinated biphenyls (PCBs)?

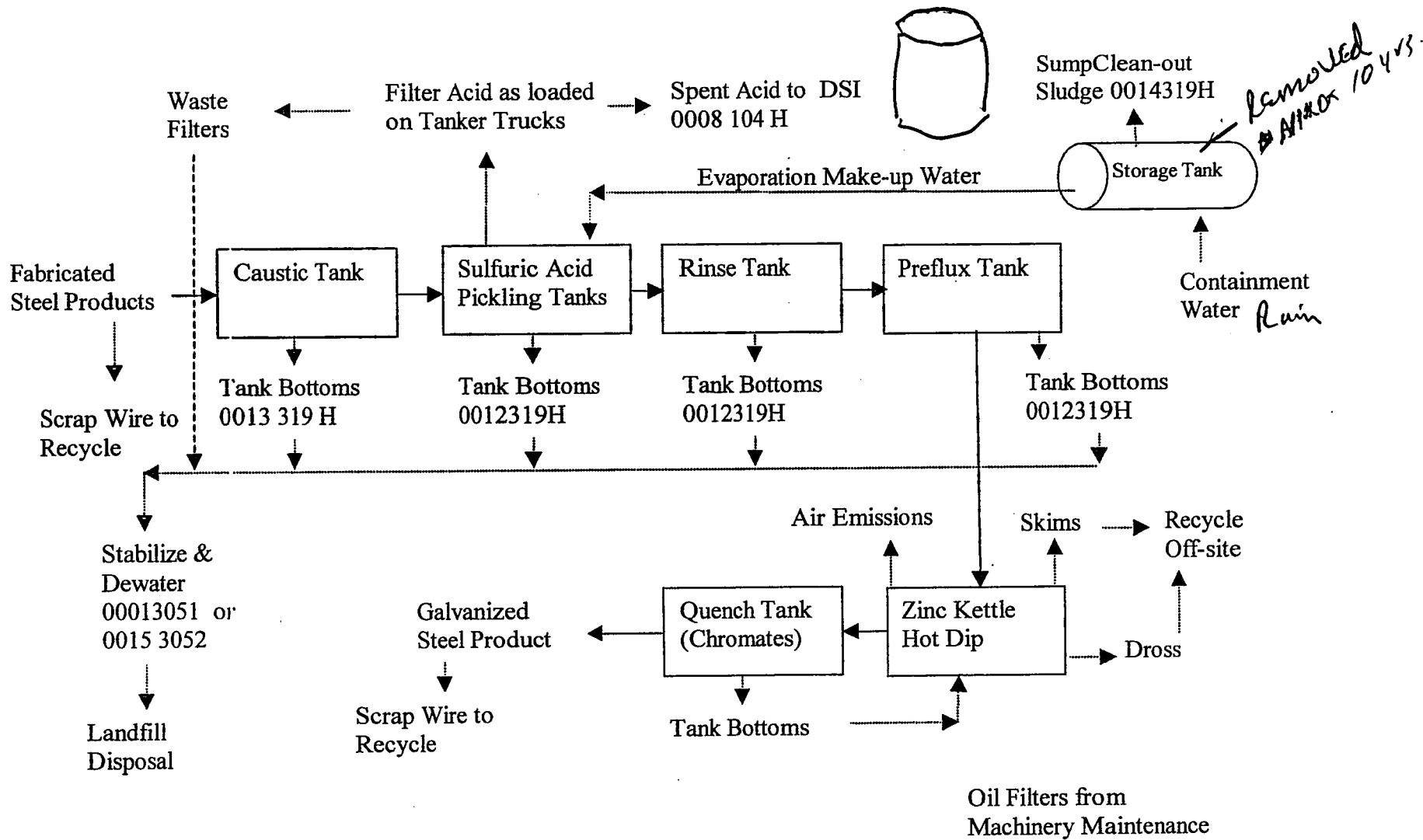
Is the waste readily decomposable?

If the answer to any of the preceding questions of Part III is "yes", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste. If all the answers to the preceding questions are "no", then proceed.

Is the waste inert? (Inertness refers to chemical inactivity of an element, compound, or a waste.)

Is the waste essentially insoluble?

If the answer to either question is "no", then the nonhazardous, industrial waste can *not* be considered a Class 3 waste.



**PRODUCTION PROCESS AND WASTES GENERATED  
INTERNATIONAL GALVANIZERS**

**AZZ incorporated**  
*Memorandum*

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**DATE:** 6/22/10

**TO:** Environmental Binder, AZZ Beaumont

**FROM:** Frank Gaudet, Corporate Environmental Engineer

**RE:** WASTE DETERMINATION, Preflux Filter Cake, 0017 319 2

---

**Process Description-**The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are laid in the yard area while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next the pieces are dipped into an acid tank for rust removal (pickling). Another acid tank is used for removing the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The quench tank contains a dilute solution of chromic acid to place a seal on the galvanized piece. The galvanized pieces are stored outside on the south side of the plant while they await pick-up by the customer.

The preflux tank contains a 24% concentration of zinc ammonium chloride. The pH of the solution is 4.5-5.5. Barium chloride is used periodically in the tank to precipitate sulfates.

**Waste Generation-** The preflux tank is continuously filtered to remove suspended particulates. The solution is pumped to a plate and frame filter press that captures the solid material and the filtered solution is returned to the process tank. The press is opened and cleaned-out at least weekly. The cake removed from the press is the waste.

**Waste Classification-**This waste is not a listed waste because it does not match any of the listed wastes in 40 CFR 261.31. This is **not** an F006 waste because the galvanizing process is not an electroplating process as defined for waste with an F006 listing. The waste is **not** a characteristic hazardous waste because laboratory tests show that TCLP results are below criteria for hazardous waste. A copy of the analysis is attached.

**Waste Management-**The waste is stored in drums or cubic yard bags that are labeled Non-hazardous waste. The waste is inspected to ensure that no free liquids are present in the containers.

**Waste Disposal-**The waste is suitable for disposal in landfills that accept Class I non-hazardous waste. Current disposal site is CSC Republic landfill in Avalon, TX.

**Attachments:**

1. Waste Classification Checklist
2. Laboratory Analysis-TTI 4/24/00

# WASTE CLASSIFICATION CHECKLIST

Generator: **AZZ Galvanizing**

Name of Waste: **PREFLUX FILTER CAKE** Waste Code Number: **0017 319 2**

## **Part I. Hazardous Waste Determination**

IF the answer to any of the questions in Part I is "Yes", THEN the waste is hazardous.

### **Part I-A. Listed Hazardous Waste Determination**

The EPA lists some 400 hazardous wastes.

#### **Information to Help You Make This Determination**

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31-33. These wastes are often referred to as follows:

- "F" listed waste (waste from nonspecific sources, Section 361.31;
- "K" listed waste (wastes from specific sources, Section 261.32;
- "P" listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33;
- "U" listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33.

**QUESTION:** Is the waste a listed hazardous waste, or is it mixed with or derived from one?

Yes  No

---

### **Part I-B. Characteristic Hazardous Waste Determination**

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

#### **Information to Help You Make This Determination**

##### **Ignitability**

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24% alcohol by volume) that have a closed-cup flash point less than 60° C (140° F).
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

**QUESTION:** Is the waste ignitable per 40 CFR §261.21?

Yes  No

##### **Corrosiveness**

Wastes that are hazardous because they are corrosive include the following:

- Aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- Liquid wastes that corrode steel at a rate rather than 6.35 mm (0.250 inches) per year.

**QUESTION:** Is the waste corrosive per 40 CFR Section 261.22?

Yes  No

##### **Reactivity**

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction
  - ▼ At standard temperature and pressure,
  - ▼ If subjected to a strong ignition source, or
  - ▼ If heated under confinement.
  
- When mixed with water, it is
  - ▼ Potentially explosive,
  - ▼ Reacts violently, or
  - ▼ Generates toxic gases or vapors.
  
- If a cyanide or sulfide-bearing waste is exposed to pH conditions between 2 and 12.5, it can generate enough toxic gases, vapors, or fumes to present a danger to human health or the environment. Generally, if a waste generates 250 ppm or more of reactive cyanides or 500 ppm or more of reactive sulfides, it is considered a reactive waste. (It should be noted that these levels of reactive compounds are just guidance. Each waste must be evaluated for reactivity on a case-by-case basis).
  
- It is normally unstable and readily undergoes violent change without detonating.
  
- It is a forbidden explosive (as defined in 49 CFR 173.51 or a Class A explosive as defined in 49 CFR 173.53).
  
- It is a Class B explosive (see 49 CFR 173.88).

**QUESTION:** Is the waste reactive according to 40 CFR §261.23?

Yes  No

**Toxicity**

A waste is toxic if the toxicity characteristic leaching procedure (TCLP) shows that a representative sample from the waste contains one or more constituents at or above the levels listed in the Table below:

arsenic.....	5.0 mg/l	1, 4-dichlorobenzene.....	7.5 mg/l	nitrobenzene.....	2.0 mg/l
barium.....	100.0 mg/l	1, 2-dichloroethane.....	0.5 mg/l	pentachlorophenol.....	100.0 mg/l
benzene.....	0.5 mg/l	1, 1-dichloroethylene.....	0.7 mg/l	pyridine.....	5.0 mg/l
cadmium.....	1.0 mg/l	2, 4-dinitrotoluene.....	0.13 mg/l	selenium.....	1.0 mg/l
carbon tetrachloride ..	0.5 mg/l	endrin.....	0.02 mg/l	silver.....	5.0 mg/l
chlordan.....	0.03 mg/l	heptachlor (and its expoxide)....	0.008 mg/l	tetrachloroethylene.....	0.7 mg/l
chlorobenzene.....	100.0 mg/l	hexachlorobenzene.....	0.13 mg/l	toxaphene.....	0.5 mg/l
chloroform.....	6.0 mg/l	hexachlorobutadiene.....	0.5 mg/l	trichloroethylene.....	0.5 mg/l
chromium.....	5.0 mg/l	hexachloroethane.....	3.0 mg/l	2, 4, 5-trichlorophenol ...	400.0 mg/l
o-cresol.....	200.0 mg/l	lead.....	5.0 mg/l	2, 4, 6-trichlorophenol ...	2.0 mg/l
m-cresol.....	200.0 mg/l	lindane.....	0.4 mg/l	2,4,5-TP (Silvex).....	1.0 mg/l
p-cresol.....	200.0 mg/l	mercury.....	0.2 mg/l	vinyl chloride.....	0.2 mg/l
cresol.....	200.0 mg/l	methozychlor.....	10.0 mg/l		
2, 4-D.....	10.0 mg/l	methyl ethyl ketone.....	200.0 mg/l		

**QUESTION:** Is the waste toxic according to CFR Section 261.24?

Yes  No

## Review of Checklist Part I – Hazardous Waste

IF the answer to any of the preceding questions is Part I is "Yes",  
THEN the waste is HAZARDOUS.

IF the answers are "No" to all the preceding questions,  
AND the waste is NON-INDUSTRIAL,  
THEN STOP here.

IF the answers are "No" to all of the preceding questions,  
AND the waste is INDUSTRIAL,  
THEN PROCEED to Part II.

## Part II. Nonhazardous Industrial Waste Classes 1 and 2

The determination in this part of the checklist applies only to nonhazardous industrial waste. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505-06 and 335.508).

IF the answer to any of the **un-numbered** questions in this part of the checklist is "Yes,"  
THEN the nonhazardous industrial waste is Class 1 waste.

IF all the answers to the **un-numbered** questions in this part are "No,"  
THEN the industrial waste is a Class 2 waste.

### Generator's Self-Classification

QUESTION: Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?  Yes  No

### Container Waste

IF the waste is a container, greater than 5 gallons in holding capacity, which has held  
✓ a hazardous substance (as defined in 40 CFR Part 302)  
✓ a hazardous waste (including acutely hazardous wastes),  
✓ a Class 1 waste, and/or  
✓ a material that would be classified as a hazardous or Class 1 waste if disposed of,  
THEN answer questions 1 and 2. (Please note that containers that have held acutely hazardous wastes must be triple rinsed before they can be classified as empty.)  
IF these conditions are not present in your situation,  
THEN proceed to the next un-numbered question.

(1) Has the container had all its residues removed?  Yes  No

(2) Has the container been rendered unusable?  Yes  No

QUESTION: Are any of the answers to questions (1) or (2) above "NO"?  Yes  No

### Regulated Asbestos-Containing Material (RACM)

QUESTION: Does the waste contain asbestos material identified as (RACM) as defined in 40 CFR Part 61?  Yes  No

### Polychlorinated Biphenyls (PCBs)

**QUESTION:** Is the waste contaminated by a material that originally contained 50 ppm or more of total PCBs?

Yes  No

**QUESTION:** Does the waste contain 50 or more ppm PCBs?

Yes  No

**Petroleum Substance Waste**

(1) Is your waste specifically identified as a petroleum substance or contaminated with a material identified as a petroleum substance?  Yes  No

(2) Does the waste contain more than 1500 ppm total petroleum hydrocarbons (TPH)?  Yes  No

**QUESTION:** Are the answers to **BOTH** of the numbered questions above "Yes"? (If one, or both, of the answers are "No", enter "No" for this question.)

Yes  No

**"New Chemical Substance"**

**QUESTION:** Is the waste from the production of a "new chemical substance," as defined by the federal Toxic Substances Control Act, 15 U.S.C.A. Section 2602(9)?

Yes  No

**Out-of-State Origin**

**QUESTION:** Is the waste generated outside the state of Texas?

Yes  No

**Constituent Levels and Specified Properties for Nonhazardous Industrial Class 1 Wastes**

**QUESTION:** If the waste is a liquid, does it have a flash point of less than 65.6°C (150° F)?\*

Yes  No

**QUESTION:** Is the waste a solid or semi-solid that – under conditions normally encountered in storage, transportation, and disposal –

- is liable to cause fires through friction or through retained heat from manufacturing or processing; or
- can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Yes  No

**QUESTION:** Is the waste a semi-solid that, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution with a pH of 2 or less or 12.5 or more? (*Exception:* for solidified, stabilized, encapsulated, or otherwise chemically bound wastes, an exception is provided in 30 TAC Section 335.505(3))\*

Yes  No

**QUESTION:** Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)? The table below contains a partial list.

Yes  No

arsenic.....	1.0 mg/l	lead.....	5.0 mg/l
barium.....	100.0 mg/l	selenium.....	1.0 mg/l
benzene.....	0.5 mg/l	silver.....	5.0 mg/l
cadmium.....	0.5 mg/l	tetrachloroethylene.....	0.7 mg/l
chromium.....	5.0 mg/l	trichloroethylene.....	0.5 mg/l



**TTI** ENVIRONMENTAL  
LABORATORIES

TEST REPORT

TTI Lab No: 110400.074

Customer I.D.: AZTEC

Date Collected: 04/11/00

Date Received: 04/11/00

Date Reported: 04/24/00

Mr. Frank Gaudet  
AZTEC MANUFACTURING, INC.  
P.O. Box 668  
Crowley, Texas 76036

Attention: Mr. Gaudet:

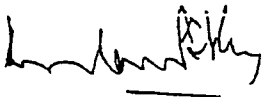
OBJECTIVE: One sample was received for the analysis of TCLP Metals  
(Ba, Cd, Cr, Pb).

VISUAL  
OBSERVATION: The sample was received marked:

1. Preflux Filter Press Cake

TEST RESULTS: The as-is-received sample was suitably preserved and prepared as per EPA approved methodology. The determinations were carried out utilizing EPA approved methods. The test results are tabulated in the attached table.

Enclosure:

  
A.S. Pabley, FAIC, CPC, CChE  
Certified Professional Chemist

RECEIVED  
APR 25 2000





**TTI ENVIRONMENTAL  
LABORATORIES**

PROJECT NAME: FILTER PRESS  
PROJECT NO: N/A  
SAMPLE ID: PREFLUX FILTER PRESS CAKE

DATE RECEIVED: 04/11/00  
DATE REPORTED: 04/24/00  
TTI LAB NO: 110400.074  
ANALYST: HP

TCLP METALS

SAMPLE DESCRIPTION	EPA METHOD NUMBER	D.L. (mg/L)	SAMPLE RESULTS (mg/L)
Barium	200.7	0.1	0.7
Cadmium	200.7	0.005	0.054
Chromium	200.7	0.02	< 0.02
Lead	200.7	0.05	0.1

2117 Arlington Downs Rd.  
Arlington, Texas 76011



**TTI ENVIRONMENTAL  
LABORATORIES**

Telephone: (817) 861-53  
FAX: (817) 251-17

**CHAIN OF CUSTODY RECORD**

CLIENT NAME <i>Aztec Mfg</i>		CLIENT CONTACT <i>Frank Gaudet</i>		TEST PARAMETERS <i>TCLP Chromium Barium Cadmium Lead</i>				LAB USE		
CLIENT ADDRESS <i>PO Box 668</i>		PHONE <i>922 214 341 2181</i>						LAB NO. <i>074</i>		
CLIENT ADDRESS <i>Crowley TX 76036</i>		FAX <i>817 297 4621</i>						TEMP. OF COOLERS 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/>		
P.O. NO.		QUOTE NO.						CUSTODY SEAL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
PROJECT NO.		PROJECT NAME <i>Filter Press</i>		SAMPLER'S NAME <i>Frank Gaudet</i>		SEAL INTACT <input type="checkbox"/> YES <input type="checkbox"/> NO				
Sample Collection			Sample Description			No. / Type Containers <sup>2</sup>			Lab Use Only	
Date	Time	C <sub>omp</sub> P	G <sub>rb</sub> b	Matrix <sup>1</sup>	VOA	A/G 1 LT.	8 OZ.	P/O		
<i>4/11/00</i>	<i>1:00 P</i>	<i>X</i>		<i>Soil Preflux Filter Press Cake</i>			<i>Bag</i>			
TURNAROUND TIME: <input checked="" type="checkbox"/> STANDARD <input type="checkbox"/> 50% RUSH <input type="checkbox"/> 100% RUSH <input type="checkbox"/> EMERGENCY <sup>3</sup> RESPONSE, E.R.				1. MATRIX: WW - Wastewater; W - Water, S - Soil; SD - Solid; L - Liquid; A - Airbag; C - Charcoal Tube; SL - Sludge; O - Oil 2. CONTAINERS: VOA - 40ml Vial; A/G - Amber or Glass 1 Liter; 8oz - Glass Wide Mouth; P/O - Plastic or Other 3. E. R. Same Day: BTEX, TPH, Volatiles, Total Lead, Ignitability, Corrosivity 4. PREV.: HNO <sub>3</sub> , HCl, H <sub>2</sub> SO <sub>4</sub> , Others						
Relinquished by (Signature) <i>Frank Gaudet</i>		Date <i>4/11/00</i>	Time <i>4:50 P</i>	Received By: (Signature) <i>Meloy</i>		Date <i>4/11/00</i>	Time <i>4:50</i>	REMARKS:  <i>Clients delivery of samples to TTI constitutes acceptance to reimburse TTI as per the terms a</i>		
Relinquished by (Signature)		Date	Time	Received By: (Signature)		Date	Time			
Relinquished by (Signature)		Date	Time	Received By: (Signature)		Date	Time			

**AZZ incorporated**  
*Memorandum*

---

**DATE:** 7/15/10  
**TO:** Environmental Binder, AZZ Beaumont  
**FROM:** Frank Gaudet, Corporate Environmental Engineer  
**RE:** WASTE DETERMINATION, Skims and Absorbent Waste, 0018 319 1

---

**Process Description-**The galvanizing process consists of a series of open-top tanks containing chemicals. Customers deliver fabricated steel pieces to the plant. The pieces are laid in the yard area while they wait processing. The pieces are brought into the open end of the plant and racked so the overhead crane can lift them. The pieces are dipped into the open top tanks that contain chemicals, rinsewater or molten zinc. A process flow schematic is attached. The pieces are first dipped into a tank with a caustic solution for the removal of grease and oil. Next the pieces are dipped into an acid tank for rust removal (pickling). Another acid tank is used for removing the zinc coating on pieces that require re-processing. The pieces are dipped into a preflux tank, dried and re-racked for a second overhead crane. The pieces are dipped into the kettle of molten zinc. The coated pieces are dipped into a quench tank to complete the process. The quench tank contains a dilute solution of chromic acid to place a seal on the galvanized piece. The galvanized pieces are stored outside on the south side of the plant while they await pick-up by the customer.

**Waste Generation-**The acid and caustic tanks sometimes have materials floating on the surface of the tank. This material can be non-aqueous liquids such as oils and greases. Or the floating materials can be solids such as identifying ribbons or tags that are attached to the steel but come loose and float off. Sometimes the floating materials are wood chips and splinters that are stick onto the steel when it is laying on the yard and float off in the process tanks.

The skimming process is performed with a commonly swimming pool skimming pole with a mesh skimmer. A worker skims the floating materials and then dumps it into an open-top drum next to the process line. The skimmer allows most of the process liquid to drip back into the process tank, but there are always a few drips of process acid or caustic that comes out with the floating material. For this reason the container is first filled with absorbent. The absorbent soaks-up the drips so that there is no liquid in the container.

**Waste Classification-**This waste is not a listed waste because it does not match any of the listed wastes in 40 CFR 261.31. The waste is not a characteristic hazardous for corrosivity because the liquids are absorbed and the solid absorbent does not have a pH that could be at hazardous levels. TCLP levels have not been tested but process knowledge indicates that contaminant concentrations are below the toxicity thresholds for hazardous waste. The waste is classified as Class I non hazardous because it is an industrial waste.

**Waste Management-**The waste is stored in drums or and labeled Non-hazardous waste. The waste is inspected to ensure that no free liquids are present in the containers. Free liquids are absorbed with absorbent materials. The waste is mixed with other plant sludges and stabilized on site.

**Waste Disposal-**The waste is suitable for disposal in landfills that accept Class I non-hazardous waste. Current disposal site is CSC Republic landfill in Avalon, TX. Stabilized waste is also suitable for disposal in municipal landfills.

**Attachments:**

1. Waste Classification Checklist
2. Confirmation of STEERS submittal

# WASTE CLASSIFICATION CHECKLIST

Generator: **AZZ Galvanizing-Beaumont**

Name of Waste: **Skims and Absorbent Waste**

Waste Code Number: **0018 319 1**

## **Part I. Hazardous Waste Determination**

IF the answer to any of the questions in Part I is "Yes", THEN the waste is hazardous.

### **Part I-A. Listed Hazardous Waste Determination**

The EPA lists some 400 hazardous wastes.

#### **Information to Help You Make This Determination**

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31-33. These wastes are often referred to as follows:

- "F" listed waste (waste from nonspecific sources, Section 361.31;
- "K" listed waste (wastes from specific sources, Section 261.32;
- "P" listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33;
- "U" listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33.

**QUESTION:** Is the waste a listed hazardous waste, or is it mixed with or derived from one?

Yes No

---

### **Part I-B. Characteristic Hazardous Waste Determination**

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

#### **Information to Help You Make This Determination**

##### **Ignitability**

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24% alcohol by volume) that have a closed-cup flash point less than 60° C (140° F).
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

**QUESTION:** Is the waste ignitable per 40 CFR §261.21?

Yes No

##### **Corrosiveness**

Wastes that are hazardous because they are corrosive include the following:

- Aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- Liquid wastes that corrode steel at a rate rather than 6.35 mm (0.250 inches) per year.

**QUESTION:** Is the waste corrosive per 40 CFR Section 261.22?

Yes No

##### **Reactivity**

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction

- ✓ At standard temperature and pressure,
  - ✓ If subjected to a strong ignition source, or
  - ✓ If heated under confinement.
- When mixed with water, it is
    - ✓ Potentially explosive,
    - ✓ Reacts violently, or
    - ✓ Generates toxic gases or vapors.
  - If a cyanide or sulfide-bearing waste is exposed to pH conditions between 2 and 12.5, it can generate enough toxic gases, vapors, or fumes to present a danger to human health or the environment. Generally, if a waste generates 250 ppm or more of reactive cyanides or 500 ppm or more of reactive sulfides, it is considered a reactive waste. (It should be noted that these levels of reactive compounds are just guidance. Each waste must be evaluated for reactivity on a case-by-case basis).
  - It is normally unstable and readily undergoes violent change without detonating.
  - It is a forbidden explosive (as defined in 49 CFR 173.51 or a Class A explosive as defined in 49 CFR 173.53).
  - It is a Class B explosive (see 49 CFR 173.88).

**QUESTION:** Is the waste reactive according to 40 CFR §261.23?

Yes  No

**Toxicity**

A waste is toxic if the toxicity characteristic leaching procedure (TCLP) shows that a representative sample from the waste contains one or more constituents at or above the levels listed in the Table below:

arsenic.....	5.0 mg/l	1, 4-dichlorobenzene .....	7.5 mg/l	nitrobenzene.....	2.0 mg/l
barium.....	100.0 mg/l	1, 2-dichloroethane.....	0.5 mg/l	pentachlorophenol .....	100.0 mg/l
benzene.....	0.5 mg/l	1, 1-dichloroethylene.....	0.7 mg/l	pyridine.....	5.0 mg/l
cadmium.....	1.0 mg/l	2, 4-dinitrotoluene.....	0.13 mg/l	selenium.....	1.0 mg/l
carbon tetrachloride..	0.5 mg/l	endrin .....	0.02 mg/l	silver.....	5.0 mg/l
chlordane.....	0.03 mg/l	heptachlor (and its epoxide)...	0.008 mg/l	tetrachloroethylene .....	0.7 mg/l
chlorobenzene .....	100.0 mg/l	hexachlorobenzene .....	0.13 mg/l	toxaphene.....	0.5 mg/l
chloroform .....	6.0 mg/l	hexachlorobutadiene.....	0.5 mg/l	trichloroethylene.....	0.5 mg/l
chromium.....	5.0 mg/l	hexachloroethane.....	3.0 mg/l	2, 4, 5-trichlorophenol ...	400.0 mg/l
o-cresol.....	200.0 mg/l	lead.....	5.0 mg/l	2, 4, 6-trichlorophenol ...	2.0 mg/l
m-cresol.....	200.0 mg/l	lindane.....	0.4 mg/l	2,4,5-TP (Silvex).....	1.0 mg/l
p-cresol.....	200.0 mg/l	mercury.....	0.2 mg/l	vinyl chloride .....	0.2 mg/l
cresol.....	200.0 mg/l	methoxychlor.....	10.0 mg/l		
2, 4-D.....	10.0 mg/l	methyl ethyl ketone .....	200.0 mg/l		

**QUESTION:** Is the waste toxic according to CFR Section 261.24?

Yes  No

## Review of Checklist Part I – Hazardous Waste

**IF** the answer to any of the preceding questions is Part I is "Yes",  
**THEN** the waste is HAZARDOUS.

**IF** the answers are "No" to all the preceding questions,  
**AND** the waste is NON-INDUSTRIAL,  
**THEN** STOP here.

**IF** the answers are "No" to all of the preceding questions,  
**AND** the waste is INDUSTRIAL,  
**THEN** PROCEED to Part II.

## Part II. Nonhazardous Industrial Waste Classes 1 and 2

The determination in this part of the checklist applies only to nonhazardous industrial waste. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505-06 and 335.508).

**IF** the answer to any of the un-numbered questions in this part of the checklist is "Yes,"  
**THEN** the nonhazardous industrial waste is Class 1 waste.

**IF** all the answers to the un-numbered questions in this part are "No,"  
**THEN** the industrial waste is a Class 2 waste.

### Generator's Self-Classification

**QUESTION:** Has the generator chosen to classify his nonhazardous waste as a Class 1 waste?  Yes  No

### Container Waste

**IF** the waste is a container, greater than 5 gallons in holding capacity, which has held  
✓ a hazardous substance (as defined in 40 CFR Part 302)  
✓ a hazardous waste (including acutely hazardous wastes),  
✓ a Class 1 waste, and/or  
✓ a material that would be classified as a hazardous or Class 1 waste if disposed of,  
**THEN** answer questions 1 and 2. (Please note that containers that have held acutely hazardous wastes must be triple rinsed before they can be classified as empty.)

**IF** these conditions are not present in your situation,  
**THEN** proceed to the next un-numbered question.

(1) Has the container had all its residues removed? Yes  No

(2) Has the container been rendered unusable? Yes  No

**QUESTION:** Are any of the answers to questions (1) or (2) above "NO"?  Yes  No

### Regulated Asbestos-Containing Material (RACM)

**QUESTION:** Does the waste contain asbestos material identified as (RACM) as defined in 40 CFR Part 61?  Yes  No

### Polychlorinated Biphenyls (PCBs)

**QUESTION:** Is the waste contaminated by a material that originally contained 50 ppm or more of total PCBs?  Yes  No

**QUESTION:** Does the waste contain 50 or more ppm PCBs?

Yes  No

**Petroleum Substance Waste**

(1) Is your waste specifically identified as a petroleum substance or contaminated with a material identified as a petroleum substance?  Yes  No

(2) Does the waste contain more than 1500 ppm total petroleum hydrocarbons (TPH)?  Yes  No

**QUESTION:** Are the answers to **BOTH** of the numbered questions above "Yes"? (If one, or both, of the answers are "No", enter "No" for this question.)

Yes  No

**"New Chemical Substance"**

**QUESTION:** Is the waste from the production of a "new chemical substance," as defined by the federal Toxic Substances Control Act, 15 U.S.C.A. Section 2602(9)?

Yes  No

**Out-of-State Origin**

**QUESTION:** Is the waste generated outside the state of Texas?

Yes  No

**Constituent Levels and Specified Properties for Nonhazardous Industrial Class 1 Wastes**

**QUESTION:** If the waste is a liquid, does it have a flash point of less than 65.6°C (150° F)?\*

Yes  No

**QUESTION:** Is the waste a solid or semi-solid that – under conditions normally encountered in storage, transportation, and disposal –

- is liable to cause fires through friction or through retained heat from manufacturing or processing; or
- can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Yes  No

**QUESTION:** Is the waste a semi-solid that, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution with a pH of 2 or less or 12.5 or more? (*Exception:* for solidified, stabilized, encapsulated, or otherwise chemically bound wastes, an exception is provided in 30 TAC Section 335.505(3))\*

Yes  No

**QUESTION:** Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30TAC Chapter 335 Subchapter R when submitted to the Toxicity Characteristic Leaching Procedure (TCLP)? The table below contains a partial list.

Yes  No

arsenic .....	1.0 mg/l	lead.....	5.0 mg/l
barium .....	100.0 mg/l	selenium.....	1.0 mg/l
benzene.....	0.5 mg/l	silver .....	5.0 mg/l
cadmium.....	0.5 mg/l	tetrachloroethylene .....	0.7 mg/l
chromium .....	5.0 mg/l	trichloroethylene.....	0.5 mg/l

[STEERS Home](#) | [Help](#) | [Contact Us](#) | [Logout](#)[Select Facility](#) | [Facility](#) | [Contacts](#) | [Billing](#) | [Wastes](#) | [Units](#) | [APF](#) | [AWS](#)

14:27

**View Waste Code with Submitted Changes: 00183191**

Facility SWR #: 30568    Data current as of: 07/15/2010

Please print this page.

This page confirms your submittal to the TCEQ.

Your confirmation number is 85983.

The data hash code is

4C593139D05A6EFC4B553AEB4E8FACD6619D37C197229A0C62DB4DB4A29F3578.

You will also receive a confirmation e-mail.

Texas Waste Code: 00183191

Company Waste SKIMS AND ABSORBENT

Description:

Origin Code: 1 - Generated on-site from a product process or service activity

New Chemical N

Substance:

Management Location: 3 - On & Off

Management Units: 005

\*Recent changes to your cross references will be reflected here. To view your copy of record, please search the [submit log](#).

Status: Active

Recycled: N

Description: Galvanizing process tanks are skimmed to remove floating debris. The skims are placed in a container with absorbent to dewater the waste.

This record has been submitted to the TCEQ. No additional changes can be made to this waste code information until these changes appear in the official TCEQ data on this web site.

[List Wastes](#)



# Annual Waste Stream



## Submitted Waste Summary Records for Report Year 2009

14:42

Facility SWR #: 30568 Data current as of: 01/14/2010

New Search | TCEQ Records | TCEQ Error Records

Please print this page.

This page confirms your submittal to the TCEQ.

Your confirmation number is 19954.

The data hash code is

7FCBBFC86A2EA99C53318310A3858D6A5D4270FA96FCD75F67186E25D90669FC.

You will also receive a confirmation e-mail.

### Submitted Records

These records have been submitted to the TCEQ and cannot be edited.

3 Waste Code and/or NRR Records  
3 Quantity Handled Records

1-3 of 3 Records

Texas Waste Code: 0008104H  
Year: 2009

*Manifest on back*

TQG	UOM	EPA Haz. Waste Numbers					Action
3167310.0000	P	D002	D006	D007	D008		A
QH	UOM	STC	Fac ID	Fac EPA ID	Comment	FE	Action
3167310.0000	P	134	32299	TXD000719518			A

Texas Waste Code: 0012319H  
Year: 2009

TQG	UOM	EPA Haz. Waste Numbers					Action
13957.0000	P	D002					A
QH	UOM	STC	Fac ID	Fac EPA ID	Comment	FE	Action
13957.0000	P	111	005				A

Texas Waste Code: 0013319H  
Year: 2009

TQG	UOM	EPA Haz. Waste Numbers					Action
2991.0000	P	D002					A
QH	UOM	STC	Fac ID	Fac EPA ID	Comment	FE	Action
2991.0000	P	111	005				A

*do not track back to this*

46,760

46,760

~~45,000~~ 46,400

41,780

49,560

~~42,000~~ 43,000

48,280

29,460

47,240

44,340

45,460

44,200

49,660

39,800

35,980

45,500

32,020

47,040

44,100

41,580

48,340

45,540

40,140

33,840

45,900

41,140

39,760

42,000

36,900

43,880

40,920

1327340

40,100

33,220

46,000

45,020

48,300

26,360

42,600

40,180

42,080

35,900

46,400

37,160

47,540

46,860

45,200

34,060

39,620

46,220

39,300

39,320

40,900

42,340

42,880

40,220

39,720

39,140

33,920

1100,040

44,120

38,460

40,960

40,080

43,700

42,060

29,340

44,960

44,160

43,100

40,840

35,980

43,380

37,980

39,580

41,920

39,820

38,900

757,340

T = 3,165,320

Reported = 3,167,310



# Hazardous Waste Tank Inspection Records

# NOTICE OF DOCUMENT QUALITY

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

THE QUALITY OF THE FOLLOWING ORIGINAL PAPER  
DOCUMENT(S) WAS SUCH THAT ALL OR PORTIONS OF THE  
SCANNED IMAGE  
MAY BE DIFFICULT TO READ OR ILLEGIBLE.

Some reasons for poor quality:

There are multiple densities per page, different types of ink, faded document, and some documents are different colors. Many of the photographs, charts, graphs, maps are of poor quality.

85

6 N  
1 A  
2.5 B

27

Daily Inventory Log

Date	2-16	2-17	2-18	2-19	2-20		
Initials	D.D	D.D.	K.H.	D.D			
Kettle Temperature	840	832	844	839			
Zinc Level	69 1/4	68 7/8	69 1/4	68 3/4			

Wire	34	34	32	32		
Strapping	12	12	12	12		
Nickel	1	1	1	1		
Oxygen	3	10	8	8		
Acetylene	6	10	10	10		
Nitrogen	0	0	1	1		
Zinc	103	101	97	93		
Shine Metal	20	19	17	16		
Dry Skims	10	11	11	11		
Dross	0	0	0	0		

Quench PH	5.5	5.5	5.0	5.0		
Caustic Soda	170	155	165	152		
Caustic PH	14	14	14	14		
Caustic Rinse PH	12	12	12	12		
Acid Tank #1	144	146	148	148		
Acid Tank #2	130	137	142	143		
Acid Tank #3	138	141	146	149		
Acid Rinse PH	1.5	1.5	1.5	1.5		
Preflux Temp	154	154	140	158		
Baume'	15.5	15.5	15.5	15.5		
Preflux PH	5.0	5.0	5.0	5.0		
Drums	16	16	15	14		
Boiler	/	/	/	/		
Boiler Outside	/	/	/	/		
Boiler Inside	/	/	/	/		
Diesel	19	19	17 1/2	17		

Quench Water Reading	100113	100145	100199	100284		
Spent Acid Storage*	/	/	/	/		

Daily Inventory Log

Date	3-2-09	3-3-09	3-4-09	3-5-09	3-6-09
Initials	KH	DD			
Kettle Temperature	832	840	830	830	830
Zinc Level	68 <sup>3</sup> / <sub>4</sub>	69 <sup>1</sup> / <sub>8</sub>	68 <sup>3</sup> / <sub>8</sub>	68 <sup>1</sup> / <sub>8</sub>	68 <sup>3</sup> / <sub>8</sub>
Wire	25	<del>25</del> 74	74	72	72
Strapping	15	10	10	10	10
Nickel	3/4 drum	3/4 drum	3/4	3/4	3/4
Oxygen	6	6	5	5	5
Acetylene	9	9	8	8	8
Nitrogen	0	0	0	0	0
Zinc	137	136	124	121	121
Shine Metal	11	6	4	4	4
Dry Skims	0	0	0	0	0
Dross	0	10	10	10	10
Quench PH	5.5	5.5	5.5	5.5	5.5
Caustic Soda	169	164	141	178	171
Caustic PH	14	14	14	14	14
Caustic Rinse PH	12	12	12	12	12
Acid Tank #1	145	142	143	144	146
Acid Tank #2	137	138	139	139	148
Acid Tank #3	146	146	145	147	148
Acid Rinse PH	4.0	4.0	4.0	4.0	4.0
Preflux Temp	154	158	155	158	160
Baume'	14	15.5	15.5	15.5	15.5
Preflux PH	5.0	5.0	5.5	5.5	5.5
Drums	44	44	43	42	41
Boiler				43	43
Boiler Outside					
Boiler Inside	11"	10"	9"		
Diesel					

Quench Water Reading	100749	100939	100937	100985	100985
Spent Acid Storage*	OK	OK	OK	OK	OK

Daily Inventory Log

Date	3-9	3-10	3-11	3-12	3-13		
Initials	KH	DD	DD	DD	DD		
Kettle Temperature	838	835	835	832	830		
Zinc Level	68	68 <sup>1</sup> / <sub>2</sub>	68 <sup>1</sup> / <sub>2</sub>	68 <sup>7</sup> / <sub>8</sub>			

Wire	72	72	70	70	70		
Strapping	9	10	10	10	10		
Nickel	3/4	3/4	3/4	3/4	3/4		
Oxygen	4	11	10	9	9		
Acetylene	8	10	10	10	10		
Nitrogen	0	1	1	1	1		
Zinc	118	115	113	111			
Shine Metal	100	100	99	99	98		
Dry Skims	4	4	4	4	4		
Dross	10	10	10	10	10		

Quench PH	5.5	5.5	5.5	5.5	5.5		
Caustic Soda	172	140	183	159	173		
Caustic PH	14	14	14	14	14		
Caustic Rinse PH	12	12	12	12	12		
Acid Tank #1	146	145	145	143	141		
Acid Tank #2	139	139	140	141	137		
Acid Tank #3	147	148	147	148	148		
Acid Rinse PH	3.5	3.5	3.5	3.5	3.5		
Preflux Temp	155	161	161	154	155		
Baume'	15.5	15.5					
Preflux PH	4.5	4.5	4.5	4.5	4.5		
Drums	39	38	37	35	34		
Boiler							
Boiler Outside							
Boiler Inside							
Diesel	42	41	39	38	38		

Quench Water Reading	101098	101120	101259	101325	101394		
Spent Acid Storage*	OK	OK	OK	OK	OK		



log B

Daily Inventory Log

Date	3-16	3-17	3-18	3-19	3-20	3-23
Initials	KH	DD	DD	D.D	DD	
Kettle Temperature	847	850	845	845	845	
Zinc Level	68 1/2	68 3/8	68 1/8	68 1/8	68 1/8	

Wire	67	67	67	66	66	
Strapping	12	10	10	9	9	
Nickel	1/2 Drum	1/2	1/2	1/2	1/2	
Oxygen	9	9	9	9	9	
Acetylene	10	10	10	10	10	
Nitrogen	10	1	1	1	1	
Zinc	108	103	103	100	97	94
Shine Metal	97	96	95	94	93	91
Dry Skims	4	8	8	8	8	
Dross	10	10	10	10	10	

Quench PH	5.5	5.5	5.5	5.5	5.5	
Caustic Soda	162	166	163	150	179	
Caustic PH	14	14	14	14	14	
Caustic Rinse PH	12	12	12	12	12	
Acid Tank #1	148	142	144	142	146	
Acid Tank #2	139	139	139	139	139	
Acid Tank #3	147	148	148	146	145	
Acid Rinse PH	4.5	4.5	4.5	4.5	4.5	
Preflux Temp	161	157	155	157	158	
Baume'	15.0	15.0	14.5	14.0	14.0	
Preflux PH	5.0	5.0	5.0	5.0	5.0	
Drums	35	34	34	34	33	
Diesel	36"	36"	35"	34"	33	

Quench Water Reading	101452	101452	101599	101658	101753	
Spent Acid Storage*	3000 OK	OK	OK	OK	OK	

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

Daily Inventory Log

Date	3/26/09	3-27				
Initials						
Kettle Temperature		841				
Zinc Level	<del>68 1/2</del>	<del>68 3/4</del>				

Wire						
Strapping		9				
Nickel		1/2				
Oxygen		6				
Acetylene		10				
Nitrogen	1	1				
Zinc	84	82				
Shine Metal	87	86				
Dry Skims		8				
Dross		10				

Quench PH		5.5				
Caustic Soda		165				
Caustic PH		14				
Caustic Rinse PH		12				
Acid Tank #1		156				
Acid Tank #2		150				
Acid Tank #3		158				
Acid Rinse PH		4.5				
Preflux Temp		171				
Baume'						
Preflux PH		5.0				
Drums		27				
Diesel		29				

Quench Water Reading		102296				
Spent Acid Storage*	OK	OK				

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

### Daily Inventory Log

Date	3-30	3-31	4-1	4-2	4-3		
Initials	KH	KH	KH	KH	KH		
Kettle Temperature	838	841	841	841	838		
Zinc Level	68 <sup>3/4</sup>	68	66	68 <sup>3/4</sup>	68 <sup>3/4</sup>		

Wire	55	55	53	53	52		
Strapping	8	8	7	7	14		
Nickel	1/2	1/2	1/2	1/2	1/2		
Oxygen	6	5	4	4	3		
Acetylene	11	11	10	10	10		
Nitrogen	1	1	1	1	1		
Zinc	96	96	96	80	77		
Shine Metal	85	84	84	77	76		
Dry Skims	8	8	8	12	12		
Dross	10	10	10	20	20		

Quench PH	5.0	5.0	5.5	5.5	5.5		
Caustic Soda	163	164	174	173	172		
Caustic PH	14	14	14	14	14		
Caustic Rinse PH	12	12	12	12	12		
Acid Tank #1	156	158	157	160	154		
Acid Tank #2	153	153	155	156	153		
Acid Tank #3	155	156	157	158	157		
Acid Rinse PH	2.5	3.5	1.5	1.5	1.5		
Preflux Temp	166	170	169	160	167		
Baume'	14.5	14.5	14.0	13.5			
Preflux PH	5.0	4.0	4.5	5.0	5.0		
Drums	28	28	18	18	18		
Diesel	24"	23"	22"	21 1/2"	20"		

Quench Water Reading	102435	102487	102521	102612	102706		
Spent Acid Storage*	0	0	2000	2000	2500		
	OK	OK	OK	OK	OK		

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

Daily Inventory Log

Date	6-9	6-10	6-11	6-12	6-13	6-16
Initials	DD	DD	DD			
Kettle Temperature	835	835	843	844	854	816
Zinc Level	68 <sup>3</sup> / <sub>4</sub>	68 <sup>7</sup> / <sub>8</sub>	68 <sup>1</sup> / <sub>8</sub>	68 <sup>3</sup> / <sub>4</sub>	69 <sup>1</sup> / <sub>4</sub>	<del>69<sup>1</sup>/<sub>4</sub></del> 69 <sup>1</sup> / <sub>2</sub>

Wire	82	79	68	64	64	62
Strapping	11	10	9	9	8	8
Nickel	1 <sup>1</sup> / <sub>3</sub> Bar.	1 <sup>1</sup> / <sub>3</sub> Bar.	1 <sup>1</sup> / <sub>3</sub>	1 <sup>1</sup> / <sub>3</sub> barrel	1 <sup>1</sup> / <sub>3</sub> barrel	1 <sup>1</sup> / <sub>3</sub>
Oxygen	4	2	2	2	0	10
Acetylene	11	11	11	11	11	11
Zinc	51	47	61	57	53	<del>58</del> 49
Shine Metal	105	95	93	90	87	85
Dry Skims	4	4	4	6	6	6
Dross	12	12	12	12	12	12

Quench PH	5	5	5	5.0	5.0	5.0
Caustic Soda	180	169	160	153	160	150
Caustic PH	14	13	14	14	13	14
Caustic Rinse PH	12	11	11	12	11	11
Acid Tank #1	152	156	158	158	160	144
Acid Tank #2	145	150	151	151	154	155
Acid Tank #3	152	153	156	156	150	154
Acid Rinse PH	5.5	5.5	5.0	5.0	5.0	5.0
Preflux Temp	145	153	151	150	149	138
Baume'	13	13	13	13	13	13
Preflux PH	5.5	5.0	5.0	5.0	5.0	5.0
Drums	12	12	12	12	12	11
Boiler	N/A	N/A	N/A	N/A	N/A	N/A
Boiler Outside	N/A	N/A	N/A	N/A	N/A	N/A
Boiler Inside	N/A	N/A	N/A	N/A	N/A	N/A
Diesel	15"	14"	14"	13"	40"	39"

Quench Water Reading	80647	80736	80906	81036	81143	81349
Spent Acid Storage*	OK	OK	OK	OK	OK	OK

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

1-3  
2/15/11

Daily Inventory Log

Date	6-15	6-16	6-17	6-18	6-19	
Initials	DD	DD	DD	DD	DD	
Kettle Temperature	845	825	815	830	840	
Zinc Level	69"	68 3/4"	69	68 7/8	69 3/4	

Wire	34	34	33	33	32	
Strapping	30	30	29	29	29	
Nickel	1/2	1/2	1/2	1/2		
Oxygen	6	5	5	4	3	
Acetylene	8	8	8	8	7	
Nitrogen	1	1	1	1	1	
Zinc	40	38	36	52	48	
Shine Metal	85	84	83	82	75	
Dry Skims	8	8	8	10	10	
Dross	8	8	8	8	8	

Quench PH	5.5	5.5	5.5	5.5	5.5	
Caustic Soda	153	160	130	136	127	
Caustic PH	14	14	14	14	14	
Caustic Rinse PH	12	12	12	12	12	
Acid Tank #1	130	169	164	160	136	
Acid Tank #2	152	152	151	151	152	
Acid Tank #3	159	159	161	161	162	
Acid Rinse PH	5.5	5.5	5.5	5.5	5.5	
Preflux Temp	151	128	144	130	150	
Baume'						
Preflux PH	1.5	1.5	1.5	1.5	1.5	
Drums	41	40	39	36	36	
Diesel	11"	11"	10"	10"	10"	

Quench Water Reading	106472	106523	106594	106663	106756	
Spent Acid Storage*	OK	OK	OK	OK	OK	

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

2009

Daily Inventory Log

Date	7-13	7-14	7-15	7-16	7-16		
Initials	KH	KH	KH	KH	KH		
Kettle Temperature	835	830	832	822	833		
Zinc Level	68 <sup>1</sup> / <sub>4</sub>	68 <sup>1</sup> / <sub>4</sub>	68 <sup>3</sup> / <sub>8</sub>	68 <sup>1</sup> / <sub>4</sub>	68 <sup>3</sup> / <sub>4</sub>		

Wire	67	67	67	67	67		
Strapping	19	19	19	19	18		
Nickel	1+	1+	1+	1+	1+		
Oxygen	9	9	9	8	6		
Acetylene	11	11	10	10	11		
Nitrogen	0	0	0	2	1		
Zinc	25	41	38	36	32		
Shine Metal	34	32	30	28	124		
Dry Skims	4	4	4	4	4		
Dross	7	7	7	7	7		

Quench PH	5.5	5.5	5.5	5.5	5.5		
Caustic Soda	160	165	168	158	165		
Caustic PH	14	14	14	14	14		
Caustic Rinse PH	12	12	12	12	12		
Acid Tank #1	152	145	161	162	161		
Acid Tank #2	157	156	156	136	156		
Acid Tank #3	161	162	158	135	166		
Acid Rinse PH	5.0	2.0	2.0	2.0	2.0		
Preflux Temp	156	158	160	148	161		
Baume'	14	14	13.5	15.5	15.5		
Preflux PH	5.5	5.5	5.0	4.5	5.0		
Drums	20	20	20	20	20		
Diesel	26"	25"	25"	23"	22		

Quench Water Reading			108104	108164	108222		
Spent Acid Storage*	OK	OK	OK	OK	OK		

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

Daily Inventory Log

Date	7-20	7-21	7-22	7-23	7-24		
Initials	DD	DD	DD	KH	DD		
Kettle Temperature	815	830	820	836	815		
Zinc Level	68 <sup>3</sup> / <sub>4</sub>	68 <sup>3</sup> / <sub>8</sub>	68 <sup>3</sup> / <sub>4</sub>	68 <sup>3</sup> / <sub>8</sub>	69 <sup>1</sup> / <sub>4</sub>		

Wire	67	67	66	66	66		
Strapping	18	18	18	17	17		
Nickel	1+	1	1	1	1		
Oxygen	7	7	6	6	6		
Acetylene	11	11	11	11	11		
Nitrogen	0	0	0	0	0		
Zinc	30	28	26	24	40		
Shine Metal	111	110	<del>109</del>	109	114		
Dry Skims	7	7	9	8	9	9	
Dross	7	7	7	7	7	7	

Quench PH	5.5	5.5	5.5	5.5	5.5		
Caustic Soda	166	165	163	166	166		
Caustic PH	14	14	14	14	14		
Caustic Rinse PH	12	12	12	12	12		
Acid Tank #1	163	159	161	165	162		
Acid Tank #2	145	145	145	145	150		
Acid Tank #3	147	143	147	140	149		
Acid Rinse PH	5.0	5.0	5.0	1.5	1.5		
Preflux Temp	149	137	148	140	158		
Baume'	15.5	15.0	15.0	15.0			
Preflux PH	5.5	5.5	5.5	5.0	5.0		
Drums	18	18	17	17	17		
Diesel	24	24	23	22	22		

Quench Water Reading	108309	108396	108430	108660	108610		
Spent Acid Storage*	OK	OK	OK	OK	OK		

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.

### Daily Inventory Log

Date	9-8	9-9	9-10	9-11		
Initials	DD	DD	K-11	DD		
Kettle Temperature	815	830	820	816		
Zinc Level	68 <sup>5</sup> / <sub>8</sub>	68 <sup>3</sup> / <sub>8</sub>	68 <sup>1</sup> / <sub>4</sub>	68		

Wire	50	50	50	50		
Strapping	52	51	51	50		
Nickel	1+	1	1+	1		
Oxygen	2	2	2	2		
Acetylene	9	9	9	9		
Nitrogen	2	2	1	1		
Zinc	30	28	26	24		
Shine Metal	44	42	40	38		
Dry Skims	2	2	4	4		
Dross	7	7	7	7		

Quench PH	5.5	5.5	5.5	5.5		
Caustic Soda	156	160	160	154		
Caustic PH	14	14	14	14		
Caustic Rinse PH	12	12	12	12		
Acid Tank #1	163	161	159	154		
Acid Tank #2	148	145	147	148		
Acid Tank #3	157	161	161	161		
Acid Rinse PH	4.5	4.0	2.5	2.5		
Preflux Temp	157	161	156	134		
Baume'						
Preflux PH	5.0	5.0	5.5	5.5		
Drums	26	25	24	24		
Diesel	29	29	29	28		

Quench Water Reading	110582	110668	110770	110839		
Spent Acid Storage*	OK	OK	OK	OK		

\*Tank must not be leaking. No cracks or holes. Containment must be intact, no cracks or breaks. Remove liquid spills within 24 hours.



Daily Inventory Log

Date	9-14	9-15	9-16	9-17	9-18	9-19
Initials						KH
Kettle Temperature						829
Zinc Level						

Wire						48
Strapping						47
Nickel						1
Oxygen						9
Acetylene						9
Nitrogen						2
Zinc						26
Shine Metal						127
Dry Skims						6
Dross						7

Quench PH						5.5
Caustic Soda						155
Caustic PH						14
Caustic Rinse PH						12
Acid Tank #1						152
Acid Tank #2						147
Acid Tank #3						153
Acid Rinse PH						1.5
Preflux Temp						151
Baume'						
Preflux PH						5.5
Drums						23
Boiler	<hr/>					
Boiler Outside	<hr/>					
Boiler Inside	<hr/>					
Diesel						23

Quench Water Reading						
Spent Acid Storage*						OK

Daily Inventory Log

Date	9-21	9-22	9-23	9-24	9-25		
Initials	DD	DD	DD	DD	DD		
Kettle Temperature	815	815	815	825	815		
Zinc Level	68 1/4	68 1/4	67 7/8	68	68 3/8		

Wire	48	46	44	44			
Strapping	47	46	45	44	43		
Nickel	1	1	1	1	1		
Oxygen	9	6	6	5	5		
Acetylene	9	9	9	9	8		
Nitrogen	2	2	2	2	2		
Zinc	24	22	38	36	32		
Shine Metal	126	123	121	121	117		
Dry Skims	6	9	10				
Dross	7	7	7	7	7		

Quench PH	5.5	5.5	5.5	5.5	5.5		
Caustic Soda	163	156	156	155	156		
Caustic PH	14	14	14	14	14		
Caustic Rinse PH	12	12	12	12	12		
Acid Tank #1	155	155	148	149	148		
Acid Tank #2	150	148	147	147	146		
Acid Tank #3	150	159	160	160	157		
Acid Rinse PH	4.0	4.0	4.0	4.0	4.0		
Preflux Temp	122	164	161	163	165		
Baume'	15.5	15.5	15.0	15.0	15.0		
Preflux PH	5.5	5.5	5.5	5.5	5.5		
Drums	23	20	19	19	18		
Boiler	_____						
Boiler Outside	_____						
Boiler Inside	_____						
Diesel	22	22	20	20	19		

Quench Water Reading	111339	111401	111501	111533	111564		
Spent Acid Storage*	OK	OK	OK	OK	OK		

## Facility Correspondence; NOR Update

From: Frank Gaudet <FrankGaudet@AZZ.com>  
To: James Mayfield <JMayfiel@tceq.state.tx.us>  
CC: INTL - Bobby McKinney <BobbyMcKinney@azzgalv.com>  
Date: 7/15/2010 12:16 PM  
Subject: RE: Inspection at the Beaumont Galvanizer #30568  
Attachments: Mem profiling Skims 00183191.pdf

James,

Here is a memo profiling the skims waste. I also added it to the NOR.

I spoke to Austin this morning and they are correcting the error on the NOR regarding the Roll-off container incorrectly listed as a Tank.

This completes the corrective action unless you have anything else.

Frank Gaudet

---

From: James Mayfield [mailto:JMayfiel@tceq.state.tx.us]  
Sent: Tuesday, July 13, 2010 5:03 PM  
To: Frank Gaudet  
Cc: INTL - Bobby McKinney  
Subject: RE: Inspection at the Beaumont Galvanizer

Thanks Mr. Gaudet, I appreciate AZZ's quick response. If nothing changes, no formal notification is required; your response and plan of action below will suffice.

As far as number 2, if you will provide a written statement/profile revealing why this stream would be considered non-hazardous, which would include both the trash and absorbent via reasons of process knowledge, and it wouldn't pass a filter test for pH content, then that will suffice.

My plan is to complete the review sometime tomorrow, but I will not have the report in the mail until next week most likely. I will inform you and Mr. McKinney of any changes or lack thereof as soon as I finish the report itself.

Regards,

James Mayfield  
TCEQ Environmental Investigator  
Beaumont, TX  
jmayfiel@tceq.state.tx.us<mailto:jmayfiel@tceq.state.tx.us>  
409-898-3838

>>> Frank Gaudet <FrankGaudet@AZZ.com> 7/13/2010 3:50 PM >>>  
Mr. Mayfield,

I wanted to let you know about our progress.

1. The alleged violation regarding the missing tank inspection dates has been corrected. The employees have been instructed to make certain that the inspection is performed daily and backup inspectors are instructed on the procedures in the event that the regular inspector is on vacation.

2. The non haz barrel next to the sulfuric acid bath contains the skims off the surface of the tank. The employees use a pool-skimmer to remove floating trash that blows onto the tanks or oils that float to the top. The barrel is partially filled with absorbent to soak up any drops of liquids that drip of the skimmer. I have a sample but it is mostly dry absorbent that I can tell will be non-haz if analyzed. I can claim process knowledge and tell you now that the waste is non-hazardous. Will this suffice? Do you want me to have the sample analyzed?

3. The NOR lists Waste Unit #-05 as a "tank". I will change this to "Misc Container Storage" but it can't be done by STEERS. I have a call into the Austin to discuss how best to make the change. I hope that they will change it on their end.

Do you need a letter as a more formal statement of our response?

Frank Gaudet

---

From: James Mayfield [mailto:JMayfiel@tceq.state.tx.us]  
Sent: Monday, July 12, 2010 8:54 AM  
To: Frank Gaudet  
Subject: Re: Inspection at the Beaumont Galvanizer

*located in Attach, subsection Waste Determination*

Mr. Gaudet, you will be notified once completed.

James Mayfield  
TCEQ Environmental Investigator  
Beaumont, TX  
jmayfiel@tceq.state.tx.us<mailto:jmayfiel@tceq.state.tx.us>  
409-898-3838

>>> Frank Gaudet <FrankGaudet@AZZ.com> 7/1/2010 2:08 PM >>>  
Mr. Mayfield,

Have you had time to look at your notes and to determine if there were any other corrective actions from your June 22 inspection of the galvanizer?

We will send you a letter next week regarding the correction of the 3 items identified on the Exit Interview Form.

Frank Gaudet, PE  
Environmental Engineer  
AZZ incorporated  
Office 817-810-0095  
Fax 817-336-5354  
Cell 214-500-4081

**FAX**

Phone: 817.810.0095 Fax 817.336.5354

**To:** Janet Haslett, TCEQ Austin**From:** Frank Gaudet, PE

Corporate Environmental Engineer

**Fax:** 817-332-2840**Pages:** 1**Date:** 7/15/2010**Re:** Change to NOR**CC:** James Mayfield, TCEQ Beaumont

409 892 2119

Ms Haslett,

Please change the NOR for our plant in Beaumont. SWR # 30568 is assigned to International Galvanizers, Inc. Waste Unit # 005 is described as a "Portable Sludge Blending Roll-off container."

Mr Mayfield from your Beaumont office inspected the facility last month and told me that the Unit Classification of "Tank" is incorrect. I am unable to change the classification using STEERS. Please change it for me. The correct classification should be "Misc Accumulation Storage."

Please call me at 817-810-0095 if you have questions about my request.

Frank Gaudet

# QUAD Neutralization

10201 Lucore St.  
Houston, TX 77017

Phone: 713-477-6460  
Fax: 713-477-7454

# Quad Environmental Services, Inc.

*Company responsible for taking spent sulfuric acid tank bottom*

## Fax Cover Page

*From:*

*To: Bobbs*

*From:*

*To: Chuck*

*Fax: 409-842-5016*

*Pages (including this cover): 3*

*Phone:*

*Date: 2-8-07*

*Re:*

*CC:*

- Urgent
- For Review
- Please Comment
- Please Reply
- Other: \_\_\_\_\_

*0012319H*

*Please sign & date both and fax back to me.*

*Thank*

*Chuck*

Please contact \_\_\_\_\_ at 713-477-6460 if you have problems receiving this FAX.



Generator Name: International Galvanizers

EPA Hazardous Waste Codes: D002, D006, D007, D008 & D010

Material Number: Treated Tank Bottoms and Debris

Waste Profile Number: \_\_\_\_\_

This form is submitted in accordance with regulations published by the EPA in 40 CFR Part 268, which governs land disposal of certain wastes. The hazardous waste identified above is one of the "restricted" wastes identified in sections 268.30, 268.31, 268.32, or 268.33. In accordance with the recordkeeping requirements specified by EPA (268.7), I have marked the appropriate box below which indicates how my waste must be managed to conform to the land disposal regulations. By signing the form, I am making the required certification shown.

Waste analysis data attached: ( ) Yes (x) No

**SECTION I: UNRESTRICTED WASTE**

(1) ( ) The waste identified above is non-hazardous or currently is not restricted by the USEPA according to CFR 268.

**SECTION II: REGULATORY CATEGORIZATION & TREATABILITY**

- A. Subcategory (for EPA codes listed above)
- B. Treatability group: ( ) Wastewater (x) Non-wastewater
- C. Treatment Standards:
  - ( ) 40 CFR 268.41 (Concentration in waste extract)
  - (x) 40 CFR 268.42 (Technology standard) Technology Code: DEACT
  - ( ) 40 CFR 268.43 (Concentration in waste)
  - ( ) E-Solvent (include separate sheet with standards)
  - ( ) FQ39 (include separate sheet with standards)
  - ( ) California waste
    - pH 0-2
    - HOC > 1000ppm
    - Thallium > 130ppm
    - PCB > 50ppm
    - Nickel > 134ppm
    - Cyanides > 1000ppm

**SECTION III: TREATMENT STATUS**

(2) ( ) **REQUIRES TREATMENT**  
The untreated waste identified above must be treated to the appropriate treatment standard set forth in 40 CFR 268, Subpart D, or 40 CFR 268.32 prior to land disposal.

(3) ( ) **MEETS TREATMENT STANDARDS**  
The untreated waste identified above has been tested and found to meet the applicable treatment standards. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, applicable, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

(4) (x) **TREATMENT TO MEET TREATMENT STANDARDS**  
The waste identified above has been treated in compliance with applicable treatment standards. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268, Subpart D, and applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

(5) ( ) **SUBJECT TO VARIANCE**  
The waste identified above is subject to:  
A. a case-by-case exemption under 40 CFR 268.5 (date waste is subject to prohibition \_\_\_\_\_)  
B. a nationwide variance (date waste is subject to prohibition \_\_\_\_\_)  
C. a no-migration petition under 40 CFR 268.6

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature: [Signature] Title: Plant Manager Date: 2/8/07



**CHANGE TO SPECIAL WASTE PROFILE SHEET**

This form may be used to request changes to an existing Special Waste Profile.

Generator Name:	International Galvanizers		
Name of Waste:	Treated Tank Bottoms and Debris	Approval Number:	

Description of Change Requested: Date February 8, 2007

Volume Increase: Anticipated annual volume is 150 cubic yards.

Extend Expiration Date:

One shipment of 15 cubic yards of this waste is treated and ready for shipment in shipper owned roll-off box #002.

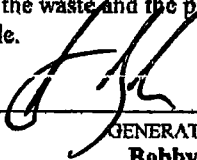
Precision Petroleum Labs, Inc. lab reference 2007-01-207, Date: 01/09/07 with QA/QC and COC (previously Submitted).


International Galvanizers, Inc. will provide post treatment laboratory analysis along with QA/QC and COC confirming that the waste meets the treatment standards for each shipment prior to scheduling the shipment.

**REASON FOR CHANGE: (Provide detailed explanation of why the change is requested).**

Add EPA hazard codes D002, D006, D007, D008 & D010 to profile as the codes carried by the characteristically hazardous Tank bottoms wastes being treated and rendered non hazardous.

I hereby certify that the waste and the process generating the waste are unchanged and are accurately represented in the original profile.

  
 \_\_\_\_\_  
 GENERATOR SIGNATURE  
**Bobby Mc Kinney**

February 8, 2007  
  
 \_\_\_\_\_  
 DATE  
**General Manager**

\_\_\_\_\_  
 GENERATOR (PRINTED NAME)  
**International Galvanizers, Inc.**

\_\_\_\_\_  
 TITLE

\_\_\_\_\_  
 COMPANY



**QUALITY CONTROL REPORT FOR IGNITABILITY**

PRECISION PETROLEUM LABS, INC. 5915 STAR LN. HOUSTON, TX 77057 PH 713-680-9425 FAX 713-680-9564

ANALYTE	TEST METHOD	REPORTING LIMIT, deg F	P-XYLENE STANDARD TEST RESULT	ACCEPTABLE RANGE	ACTUAL FLASH POINT OF P-XYLENE	VARIANCE FROM ACTUAL FLASH
IGNITABILITY, deg F	D-92	70	82	78-84	81	1
<b>DATE:</b>	1/9/2007		<b>COMMENTS:</b>			
<b>ANALYST:</b>	C.G.					

Jan. 12. 2007 12:49PM

No. 9626 P. 3

PRECISION PETROLEUM LABS, INC. 5915 STAR LN. HOUSTON, TX 77057 PH 713-680-9425 FAX 713-680-9564						
ANALYTE	TEST METHOD	REPORTING LIMIT, PPM	% RECOVERY FOR LABORATORY CONTROL SAMPLE	% RECOVERY FOR MATRIX SPIKE	% RECOVERY FOR MATRIX SPIKE DUPLICATE	RESULT FOR METHOD BLANK
CYANIDES	EPA-9010	0.01	110	97	92	BRL

DATE:1-9-2007

ANALYST: T.H.

LABORATORY CONTROL SAMPLE @ 1.00PPM

ACCEPTABLE RANGE FOR LABORATORY CONTROL SAMPLE: 85%-115%

MATRIX SPIKE SAMPLES@ 1.00PPM

ACCEPTABLE RANGE FOR MATRIX SPIKE SAMPLES: 75%-125%

BRL: BELOW REPORTING LIMIT

PRECISION PETROLEUM LABS, INC. 5915 STAR LN. HOUSTON, TX 77057 PH 713-680-9425 FAX 713-680-9564						
ANALYTE	TEST METHOD	REPORTING LIMIT, PPM	% RECOVERY FOR LABORATORY CONTROL SAMPLE	% RECOVERY FOR MATRIX SPIKE	% RECOVERY FOR MATRIX SPIKE DUPLICATE	RESULT FOR METHOD BLANK
SULFIDES	EPA-9030	1.0	96	90	123	BRL

DATE: 1-9-2007

ANALYST: T.H.

LABORATORY CONTROL SAMPLE @ 10.0 PPM

ACCEPTABLE RANGE FOR LABORATORY CONTROL SAMPLE: 80% - 120%

MATRIX SPIKE SAMPLES @ 10.0 PPM

ACCEPTABLE RECOVERY RANGE FOR MATRIX SPIKE SAMPLES: 70% - 130%

BRL: BELOW REPORTING LIMIT

Jan. 12. 2007 12:49PM

No. 9626 P. 1

### QUALITY CONTROL REPORT FOR METALS IN SOLIDS

PRECISION PETROLEUM LABS, INC. 5915 STAR LN. HOUSTON, TX 77057 PH 713-680-9425 FAX 713-680-9564

ANALYTE	TEST METHOD	REPORTING LIMIT, MG/KG	% RECOVERY FOR LABORATORY CONTROL SAMPLE	% RECOVERY FOR MATRIX SPIKE	% RECOVERY FOR MATRIX SPIKE DUPLICATE	RESULTS FOR METHOD BLANK
ARSENIC	EPA-6010B	0.500	105	113	91	BRL
BARIUM	EPA-6010B	0.100	88	93	107	BRL
CADMIUM	EPA-6010B	0.100	87	125	114	BRL
CHROMIUM	EPA-6010B	0.150	92	117	120	BRL
LEAD	EPA-6010B	0.390	96	82	83	BRL
MERCURY	EPA-6010B	0.170	109	80	91	BRL
SELENIUM	EPA-6010B	0.630	111	116	80	BRL
SILVER	EPA-6010B	0.130	94	90	102	BRL

DATE: 1-9-2007

ANALYST: T.H.

LABORATORY CONTROL SAMPLE@10.00MG/KG

ACCEPTABLE RECOVER RANGE FOR LABORATORY CONTROL SAMPLE: 85% -115%

MATRIX SPIKE SAMPLES@10.00MG/KG

ACCEPTABLE RANGE FOR MATRIX SPIKE SAMPLES: 75%-125%

BRL: BELOW REPORTING LIMIT

# PRECISION PETROLEUM LABS, INC.

5915 Star Lane Houston, TX. 77057  
 Ph. 713-680-9425 Fax: 713-680-9564

## CERTIFICATE OF ANALYSIS

COMPANY: QUAD ENVIRONMENTAL  
 INVOICE No.: 32583  
 LAB REFERENCE No.: 2007-01-207  
 PRODUCT ID: 61211-1 TREATED TANK BOTTOMS 12-19-2006  
 DATE RECEIVED: 01-09-2007  
 AUTHORIZED BY: CHUCK GOODNER

	TEST METHOD	REPORTING LIMIT	RESULTS
Ph	S.W. 9040	0.01	10.72
Ignitability (Flash Point), COC	D-92	70°F	> 400
Reactive Cyanides, PPM	S.W. 9010	0.01	BRL
Reactive Sulfides, PPM	S.W. 9030	1.0	BRL

PARAMETER	TEST METHOD	PREPARATION METHOD	REPORTING LIMIT, MG/L	RESULT MG/L	REGULATORY LEVEL, MG/L
Antimony	EPA-6010	EPA-1311	0.330	BRL	-----
Arsenic	EPA-6010	EPA-1311	0.500	BRL	5.000
Barium	EPA-6010	EPA-1311	0.100	0.188	100.000
Beryllium	EPA-6010	EPA-1311	0.100	BRL	-----
Cadmium	EPA-6010	EPA-1311	0.100	BRL	1.000
Chromium	EPA-6010	EPA-1311	0.150	BRL	5.000
Lead	EPA-6010	EPA-1311	0.390	BRL	5.000
Mercury	EPA-6010	EPA-1311	0.170	BRL	0.200
Nickel	EPA-6010	EPA-1311	0.200	BRL	-----
Selenium	EPA-6010	EPA-1311	0.630	BRL	1.000
Silver	EPA-6010	EPA-1311	0.130	BRL	5.000
Thallium	EPA-6010	EPA-1311	0.450	BRL	-----
Vanadium	EPA-6010	EPA-1311	0.150	BRL	-----
Zinc	EPA-6010	EPA-1311	0.100	BRL	-----

BRL= BELOW REPORTING LIMIT

  
 DANIEL ZABIHI  
 LAB MANAGER

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS,  
 OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT.



**GENERATOR WASTE PROFILE SHEET**

Page 1 of 2

 Requested Disposal Facility: Golden Triangle L62Y317891  
*an Allied Waste Company*

Waste Profile #

AWI Sales Rep:

Date:

**I. Generator Information**

Generator Name: International Galvanizers			
Generator Site Address: 5898 Industrial Rd.			
City: Beaumont	County: Jeff.	State: TX	Zip: 77705
State ID/Reg No: 30568	State Approval/Waste Code: 00153052	(if applicable)	SIC Code: 2889
Generator Mailing Address (if different): c/o Quad Environmental Services, Inc.; 10201 Lucore St.			
City: Houston	County: Harris	State: TX	Zip: 77017
Generator Contact Name: Chuck Goodner			
Phone Number: 713-477-6460		Fax Number: 713-477-7454	

**IIa. Transporter Information**

Transporter Name: BFI		Contact Name:	
Transporter Address:			
City:	County:	State:	Zip:
Phone Number:	Fax Number:	State Transportation Number:	

**IIb. Billing Information**

Bill To: Quad Environmental Services, Inc.		Contact Name: Chuck Goodner	
Billing Address: 10201 Lucore St.			
City: Houston	State: TX	Zip: 77017	Phone Number: 713-477-6460

**III. Waste Stream Information**

Name of Waste: Treated Tank Bottoms	
Process Generating Waste: Hotdip galvanizing process tank bottom sludges, drippage and spillage are put into a container where they are mixed with cement and a proprietary chemical (less than 1%) to stabilize the sludges, microencapsulate the heavy metals and result in a solid matrix.	
Type of Waste	<input checked="" type="checkbox"/> INDUSTRIAL PROCESS WASTE or <input type="checkbox"/> POLLUTION CONTROL WASTE
Physical State:	<input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER <input type="checkbox"/> LIQUID <input type="checkbox"/> OTHER: _____
Method of Shipment:	<input checked="" type="checkbox"/> BULK <input type="checkbox"/> DRUM <input type="checkbox"/> BAGGED <input type="checkbox"/> OTHER: _____
Estimated Annual Volume:	<input checked="" type="checkbox"/> CUBIC YARDS: 150+ <input type="checkbox"/> TONS: _____ <input type="checkbox"/> GALLONS _____ <input type="checkbox"/> OTHER: _____
Frequency:	<input type="checkbox"/> ONE TIME <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input checked="" type="checkbox"/> OTHER: QUARTERLY
Special Handling Instructions: NA	

**IV. Representative Sample Certification** NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: 12/19/08	Type of Sample: <input type="checkbox"/> COMPOSITE SAMPLE <input checked="" type="checkbox"/> GRAB SAMPLE	
Laboratory: Precision Petroleum Labs	Sample ID Numbers: Quad-81211-1 PPL 2007-01-207	
Sampler's Employer: Kelly Debner		
Sampler's Name (printed): KELLY DEBNER	Signature: <i>Kelly Debner</i>	



GENERATOR WASTE PROFILE SHEET (continued)

Waste Profile #

V. Physical Characteristics of Waste

Table with 2 columns: Characteristic Components, % by Weight (range). Rows include Soil, Cement, Metal salts and hydroxides, Plastic, glass, paper, wood, metal, rubber, cardboard, misc. debris, and a detailed section for Color, Odor, Free Liquids, % Solids, pH, Flash Point, and Phenol.

Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Required Parameters Provided for this Profile

Table with 2 columns: Question, Yes/No. Questions include: Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides...? Does this waste or generating process cause it to exceed OSHA exposure limits...? Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs)...? Does this waste contain regulated concentrations of listed hazardous wastes...? Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin...? Is this a regulated Toxic Material...? Is this a regulated Radioactive Waste...? Is this a regulated Medical or Infectious Waste...? Is this waste generated at a Federal Superfund Clean Up Site?

VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste.

Bobby McKinney General Manager
Authorized Representative Name And Title (Printed)

International Galvanizers, Inc
Company Name

[Signature]
Authorized Representative Signature

January 22, 2007
Date

VII. Allied Waste Decision

Approval/Rejection checkboxes, Expiration date, Conditions section, and Name/Signature/Date fields.



**THIRD PARTY SIGNATURE AUTHORIZATION  
for Solid Waste Disposal**

Date January 22, 2007

To Whom it May Concern:

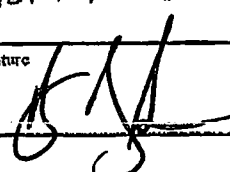
Please be advised that the following company/individual has been appointed to work as our agent for purposes of managing waste materials that we may generate.

Name of Authorized Agent <b>Chuck Goodner</b>	Title <b>President</b>
Name of Company <b>Quad Environmental Services, INC.</b>	Telephone Number <b>713-477-6460</b>

The above broker/individual is authorized to act as our authorized agent for the following purposes:

- Complete and sign Generator Waste Profile Sheets.
- Complete and sign Generator Waste Profile Sheet-Recertifications.
- Authorize amendments to Generator Waste Profile Sheets.
- Sign contracts to dispose and/or transport material.
- Sign certifications necessary to comply with landfill requirements.
- Sign manifests to initiate shipment to disposal facilities.

Our authorized broker/agent will notify us prior to any action stated above, and will provide us with copies of any documents bearing our name.

Name of Generator <b>Bobby McKinney</b>	Title <b>General Manager</b>
Name of Company <b>International Galvanizers, Inc.</b>	Mailing Address <b>P.O. Box 21677 Beaumont, Texas 77720</b>
Signature 	Telephone Number <b>409-842-0216</b>

10201 Lucore St.  
Houston, TX 77017

Phone: 713-477-6460  
Fax: 713-477-7454

# Quad Environmental Services, Inc.

**Fax Cover Page**

*Chude* *Bobby*

To: Bobby McKinney From: Chuck

Fax: 409-842-5016 Pages (including this cover): 10

Phone: \_\_\_\_\_ Date: \_\_\_\_\_

Re: Waste Profile CC: \_\_\_\_\_

- Urgent    For Review    Please Comment    Please Reply    Other: \_\_\_\_\_

Please Sign the "Third Party Signature Authorization and page 2 of the "Generator Waste Profile Sheet." The rest is a copy of analytical for your files.

Call if you have a questions

*Chuck*


Please contact \_\_\_\_\_ at 713-477-6460 if you have problems receiving this FAX.

Quad Environmental Services, Inc.  
In-Plant Waste Treatment and Solidification Services  
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The Commissions favorable response was conditioned upon a few requirements, similar to those mentioned above.

In summary, on-site treatment of hazardous wastes may be performed by a contractor operating portable

John W. Gubler  
Executive Director  
Public Health, Conservation  
Lobby Group, Executive Director



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
Protecting Texas by Restoring and Preserving Public Resources

January 25, 1994

Mr. Charles J. Goodner  
Quad Environmental Services, Inc.  
2224 E. Wallisville Road  
Highlands, Texas 77822

Re: Letter of November 30, 1993  
Chemical fixation of sludges and solids

Dear Mr. Goodner:

The Texas Natural Resource Conservation Commission (TNRCC) has received your letter of November 30, 1993 in which you requested the TNRCC provide, in writing, the position of the TNRCC regarding the treatment of waste as described in your letter. Your letter indicates that the waste treatment is the chemical fixation of sludges and solids containing metals and/or hydrocarbon material using a proprietary chemical formulation and a process. The treatment would be provided on-site at various customer locations in a transportable mixing container. Given the information in your letter, the following information is being provided regarding the applicability of the regulations pertaining to industrial solid waste and hazardous municipal waste.

30 Texas Administrative Code (TAC) 5335.2 sets forth the permitting requirements for industrial solid waste and municipal hazardous waste. In accordance with 30 TAC 5335.2, a permit is required for the storage, processing, or disposal of any industrial solid waste or municipal hazardous waste unless the activity meets certain exemptions or is otherwise authorized by the TNRCC or its predecessor agencies, the Texas Department of Health, or other Texas state agency. With respect to hazardous waste, treatment of the hazardous waste may be exempt from permitting under the following conditions:

1. The treatment occurs at the facility where the waste is generated;
2. The equipment is open to tanks or equipment;
3. The treatment occurs in 90-days or less;
4. The generator of the waste complies with the requirements of 30 TAC 5335.6; and
5. The generator complies with the notification requirements of 30 TAC 5335.6.

PA 800 1007 • Austin, Texas 78713-3067 • 512/704-1000

Mr. Charles Goodner  
Page 2  
January 25, 1994

Your letter indicates that the process your company has developed can be used to immobilize "Land Ban" constituent contaminants consistent with the requirements for safe and legal disposal of hazardous wastes in a RCRA Landfill unit. It is also indicated that the process can be used to immobilize and encapsulate leachable contaminants to below TCLL thresholds, allowing for disposal in landfills for non-hazardous waste. Please note that it is the responsibility of the generator, treatment facility, and disposal facility to comply with the applicable portions of 40 CFR of Federal Regulations (CFR) Part 264 and 30 TAC 5335 Subchapter C regarding the Land Disposal Restrictions.

With respect to non-hazardous industrial waste, a permit would not be required for the treatment of non-hazardous industrial waste if the waste is generated on-site and is not commingled with waste from other sources. Solidification pursuant to 30 TAC 5335.6 is required. A permit for the treatment of industrial waste would be required if treatment of non-hazardous industrial waste is occurring at a facility and the waste is from off-site or includes waste from off-site.

As stated previously, the information given above pertains to the industrial solid waste and hazardous municipal waste regulations only. It is recommended that you contact the TNRCC Office of Air Quality to obtain information regarding the requirements under the air regulations which may apply to the treatment of waste using the process you have described.

Attached for your information is a copy of the TNRCC's brochure on how to obtain the rules of the Commission. Should you have any questions or require additional information, please contact me at 512/539-0882.

Sincerely,  
Katherine Nelson

Katherine Nelson, Supervisor  
Facility Team II  
Permits Section  
Industrial and Hazardous Waste Division

KJN:kn  
Attachment

treatment equipment, even if the facility operates pursuant to a RCRA exemption. All other applicable guidelines must be complied with, and, of course, it is critical that you utilize a contractor who can perform the job in a safe and efficient manner.

We at Quad are ready to provide you with a safe, efficient and legal means to reduce your hazardous waste volume.

Quad Environmental Services, Inc.  
In-Plant Waste Treatment and Solidification Services  
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Quad Environmental has carried the application of these rules to the farthest extent on behalf of its customers by requesting the TNRCC to provide it with a clarification letter regarding Quad's portable stabilization service. In our letter to the Commission we outlined our services and requested their comment.

JUN-27-94 THU 10:10 A

P-01



November 30, 1993

Mr. Minor Hibbs  
Manager, Permits Section  
Industrial and Hazardous Waste Division  
TNRCC  
P.O. Box 13087  
Austin, TX 78711-3087

Dear Minor:

Quad Environmental Services was formed this year to assist waste generators in practicing sound waste management. In this pursuit, we provide an array of services.

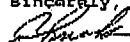
This letter is specific to one of those services, the chemical fixation of sludges and solids containing metals and /or hydrocarbon material. The service would be provided on site at various customer locations. Processing is done in a transportable mixing container.

Our process combines a proprietary chemical formulation and a pozzolon such as cement, fly ash or other as is specifically required for proper treatment. The combination successfully immobilizes the contaminants by encapsulating them within a stabilized matrix.

The process can be used to immobilize "Land Ban" constituent contaminants consistent with requirements for safe and legal disposal of hazardous wastes in a RCRA land fill unit. It can also be used on some materials to immobilize and encapsulate leachable contaminants to below TCLP thresholds, allowing for disposal in landfills for non-hazardous wastes.

Certain potential customers have asked us to obtain the written position of various regulatory agencies regarding this type of waste treatment. Would you be so kind as to respond regarding the position of the TNRCC.

Thank you for you time and cooperation in this matter.

Sincerely,  
  
Charles L. Goodner

CG/es

2824 E. Wallisville Rd • Highlands, Texas 77562 • (713) 843-2463 • FAX (713) 843-2197

printed on recycled paper ♻️

Quad Environmental Services, Inc.  
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For further clarification as to the applicable rules, the following letter summarizes:

March 25, 1987

Kathryn T. Allford  
NL Treating Chemicals  
NL Industries, Inc.  
17402 Wallisville Road  
Houston, TX 77049

Dear Ms. Allford:

Thank you for your letter of February 27, 1987. Your question concerning on-site treatment by a generator is covered by 40 CFR 262.34, the "90-day generator" rule. You are correct in your assessment of the rule. That is, a generator who otherwise meets the requirements of 40 CFR 262.34 need not obtain a RCRA hazardous waste permit to conduct treatment in a tank system. In your specific situation, you are well within the 90-day time limit, and as long as you meet the other requirements of 262.34, you should have no regulatory problems in setting up your treatment system.

If you have further questions, call Mike Petruska of my staff at (202) 382-4761.

Sincerely,

Marcia Williams  
Director  
Office of Solid Waste

In all of these position letters, the Agency makes it clear that it believes that no permit is required by either a generator or a generator's service contractor to treat the generator waste on site as long as all other applicable regulations are strictly adhered to.

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In another clarification letter to the Department of Environmental Protection in Kentucky, the EPA explained that there are no additional permitting requirements to perform waste treatment activities at a site permitted to store RCRA wastes. Storage is also allowed without permitting (due to the 90-day exemption rule) and, accordingly, there should be no special permitting at such facilities to treat wastes.

December 22, 1986

Mr. J. Alex Barber  
Director  
Division of Waste Management  
Commonwealth of Kentucky  
Department of Environmental Protection  
Fort Boone Plaza  
18 Reilly Road  
Frankfort, Kentucky 40601

Dear Mr. Barber:

My apologies for the delay in getting back to you on your letter of August 27, 1986, concerning the treatment of hazardous waste in a generator's accumulation tanks and containers.

As you know, the Agency stated in the preamble to the final small quantity generator regulations in the March 24, 1986, Federal Register that treatment could occur in a generator's accumulation tanks and containers without a permit, provided the treatment was performed strictly in accordance with 40 CFR 262.34. While I can appreciate the points you raise in your letter with respect to consistency of interpretation, I believe that this policy discussion was, and remains, appropriate for several reasons.

First, while it appears on the surface to be a major shift in policy, it represents a long-standing opinion of our Office of General Counsel that consistency dictates that treatment and storage which is regulated identically at permitted facilities also be regulated identically at generation sites. At this time, we do not have special treatment standards in the regulations for any treatment activities except for incinerators. Thus, when we permit treatment facilities, or permit storage facilities, the identical standards apply. If the storage or treatment occurs in a tank, the tank standards must be met. If the activity occurs in a container, the container standards apply. It is true that additional permit requirements, including financial responsibility and corrective action, are imposed at both treatment and storage facilities where permitting is required and I fully agree that this is appropriate.

While we have differentiated in the regulations between long term storage and accumulation at generation sites, they are nevertheless at their core identical activities. We have chosen to exempt from permitting requirements (as well as associated financial responsibility and corrective action provisions) storage (i.e., accumulation) which occurs at generation sites for less than 90 days (or 180 or 270 days in the case of small quantity generators). Since the regulations do not impose additional standards for treatment when it occurs in a storage facility, there is no basis for regulating treatment at an exempt storage facility.

Whether or not the 262.34 exemption from permitting for storage, as well as treatment, is appropriate is an issue which we are now beginning to re-examine. As you know, we published an advance notice of proposed rulemaking on July 14, 1986, which sought comment on various aspects of the exemption. Should we change the 262.34 regulations for on-site accumulation, it would of course affect the status of treatment as well. Similarly, if we develop treatment standards for additional activities which we believe warrant special standards, these activities would also lose their exemption from permitting.

We ultimately chose to communicate this legal interpretation in the small quantity generator regulations because we believe that it is essential that treatment not be unduly discouraged under our regulations, particularly at a time when disposal options are being severely limited under a variety of statutory and regulatory provisions. In particular, we were concerned that a substantial amount of treatment was occurring at generator sites which were unregulated prior to the September 22, 1986 effective date for small quantity generator regulations. It was important to clearly state the Agency's position on this matter.

As a practical matter, although this policy will allow some treatment which has been carried out without a permit up to this point to continue, we believe it will have little or no impact at permitted or interim status treatment facilities. While permitted or interim status treatment units at generator sites may now become strictly accumulation units and thus exit the permit process, we would assume that these tanks or containers have not been operated strictly in accordance with the accumulations provisions in the past (e.g., emptied every 90 days) and thus have been legitimately and appropriately brought into permit system. Furthermore, exiting the permit process must be accomplished strictly in accordance with procedures already established (e.g., in accordance with the closure rules).

Again, let me assure you that I understand your misgivings with respect to this discussion. However, I must also point out that it is our position that this is and has been the legal situation with respect to treatment in accumulation tanks and containers since the 262.34 provisions were promulgated.

I hope that this has helped to clarify our position on this issue. If you wish to discuss the issue in more detail, please feel free to contact Maureen Smith in the Office of General Counsel at (202) 382-7703 or Bob Axelrad, or my staff, at (202) 382-4769.

Sincerely,

Marcia Williams  
Director  
Office of Solid Waste



**Quad** Environmental Services, Inc.  
**In-Plant Waste Treatment and Solidification Services**  
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The EPA has issued a number of clarification statements on the subject of on site waste treatment. The letter below sets the general "tone" of EPA's position.

July 1, 1987

Bernard E. Cox, Jr., Chief  
Hazardous Waste Branch  
Land Division  
Alabama D.E.M.  
1751 Federal Drive  
Montgomery, AL 36130

Dear Mr. Cox:

This is in response to your letter of June 11, 1987, requesting clarification of EPA's policies concerning the regulatory status of on-site treatment by generators under 40 CFR 262.34. The following addresses, first, EPA's general policy in this area, and then the specific container-related examples you provided.

1. General policy. Although you appear to believe that EPA has amended its interpretation of the hazardous waste rules in March 1986, EPA actually discussed the relationships between storage treatment, and disposal in the preamble of the January 12, 1981 Federal Register. (See 46 Federal Register 2806-2808). In particular, EPA noted that treatment can occur either at a disposal or a storage facility and that the conduct of treatment does not affect a facility's regulatory status. (Id. at 2808.) Nothing in 262.34, or in preambles specifically related to the section (often called the "90 day generator" rule) preclude treatment. EPA believes that treatment activities should similarly not affect the regulatory status of 90-day generators.

Of course, EPA's most important consideration is protection of human health and the environment. In discussing treatment at storage facilities, EPA noted that the general requirement of 264.17, which applies to all storage facilities, addresses hazards posed by ignitable, incompatible, or reactive wastes. (See 46 Federal Register 2806: January 12, 1981.) EPA concluded, therefore, that the most serious hazards likely to be posed during treatment would be addressed under these provisions. (Id.) Ninety-day generators similarly must comply with special requirements for ignitable, reactive, or incompatible waste under Subparts I and J of Part 265 (referenced by 262.34).

Finally, EPA notes that treatment often renders waste less or nonhazardous, or more amenable for further treatment, recycling, etc. The hazard posed by waste shipped off-site can thereby be reduced, and recycling can be promoted. A requirement to obtain a permit for any on-site treatment would very likely discourage such practices.

2. Treatment in containers. Although nothing in 262.34 specifically precludes treatment in containers, 90-day generators are subject to the container management standards of Part 265, Subpart I. One provision of Subpart I (265.173 (a)) requires that containers be kept closed during storage, except when adding or removing waste. Other sections of Subpart I provide that containers must be handled to prevent leaks or ruptures (265.173 (b)), and address hazards posed by incompatible, reactive, or ignitable waste (265.172, 265.176, and 265.177). These requirements limit the extent that treatment could occur in containers. The examples you provided (burning in open drums or tanks) would be considered open burning under 260.10, and as such, would generally be recognized as a method of disposal. Disposal does change a facility's regulatory status, and is not allowed under 262.43. Further, open burning (except for certain explosive wastes) is prohibited under 265.382. Finally, if there are cases of treatment that do not appear to be adequately regulated under 262.34, EPA can take action to mitigate an imminent hazard under RCRA Section 7003.

Please feel free to contact Michael Patruska at 475-6676 if you have any further questions.

Sincerely,

Marcia Williams, Director  
Office of Solid Waste

cc: James Scarbrough, Chief  
Region IV Residuals Material Branch  
Hazardous Waste  
Division Directors, Regions I-X

<sup>1</sup> We view this preamble discussion as more definitive than the statements and guidance you quote from 1980.

**Quad Environmental Services, Inc.**  
**In-Plant Waste Treatment and Solidification Services**

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4. Calcium oxide and calcium silicates hydrate the cementation process while dehydrating QFXX<sup>®</sup>, generating cross-linkage among particles and dehydrated molecules, substantially contributing to the prevention of volume expansion in the solidified mixture.

5. QFXX<sup>®</sup>, chemically modified by the reaction to this point, then gradually accelerates the completion of the cementation reaction.

6. The hydrate gel and crystals formed will entrap, physically and chemically, the inorganic components of the hazardous waste within the matrix of the solidified mixture. Some fine inorganic particles are simply physically encapsulated within the macro and micro pores of the matrix, and some metals are loosely absorbed on the surface of the crystals and particles of the fixing agent. The remaining inorganic components incorporated within the crystalline structure through ion exchange, substitution, solid solution, and completes formation. The entrapment and encapsulation of inorganic components are naturally enhanced by the cage-like structure formed by the cross-linkage between molecules of QFXX<sup>®</sup> and the particle surfaces.

7. Some dissolved or dispersed organic components of the waste are physically entrapped and encapsulated in the macro and micro pores of the matrix of the solidified mixture or adsorbed or chemisorbed on the surfaces of these pores through dipole-dipole interaction, London force attraction, or hydrogen bonding. The remainder is chemically incorporated into the matrix through a variety of processes including, but not limited to, complex formation, chemical (covalent) bonding, and cross-linkage formation. QFXX<sup>®</sup> largely overcomes the tendency of the organic waste components to inhibit the cementation reaction.

The solidified mixture resulting from the QFXX<sup>®</sup> Process tends to have much greater density and mechanical strength resulting in substantial limitation in leaching rates of the final waste form. Among the reasons for this characteristic are as follows:

1. The increase in density of a solid characteristically reduces the permeability of water movement through it, hence eliminating any substantial mobility of hazardous components within the solidified waste form.
2. The increase in the mechanical strength also tends to minimize the formation of cracks within the solidified waste form particles, thereby minimizing the generation of additional surfaces for water penetration to transport hazardous components within and out of the solidified mass.

### The Treatment Plan

Each waste processing situation is different and Quad approaches each job with this in mind. We review the material to determine its history and background (process knowledge); the wastes probable or possible constituents and the nature of its hazard. We analyze the wastes and develop the entire treatment plan which may include oxidation, reduction or other pre-treatment step and the exact details of the final chemical fixation phase, including the exact chemistry, curing procedures and time and sampling and verification details.

### Processing of Wastes On Site, Regulations & Permitting

RCRA is the established and accepted guidance regulations for hazardous solid waste management activities. These regulations encompass all aspect of waste management including definitions, categorization, procedures, requirements and rules to deal with wastes from "cradle to grave". RCRA hazardous waste generators are generally either Permitted Generators; those who operate under the 90 day exemption (without permits required) or who generate less than 1000 kilograms per month.

One of the most common misconceptions about RCRA is that permits are required for all on site treatment activities. This is not the case. In fact the preamble to the March 24, 1986 Federal Register provides, "Of course, no permitting would be required if a generator chooses to treat their hazardous wastes in the generator accumulation tanks or containers in conformance with the requirement of 262.34 and subparts J or I of part 265."

There is nothing in 262.34 which precludes treatment of waste in an accumulation tank or container covered by that provision. As long as tanks or containers are operated strictly in compliance with all applicable standards, the EPA believes that treatment therein is permissible without permit, under existing rules. The EPA has clarified their position that neither a generator nor a generator's contractor are required to have permits in specific regulatory interpretations.

**Quad Environmental Services, Inc.**  
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Pozzolonic materials have been used in the past for solidification, but they have not performed successfully with most organic and many inorganic wastes. Absorption is a physical process which may often be reversed. Stabilization involves a physical and chemical reaction between liquids, waste constituents, and stabilizing reagents. Current EPA regulations require the demonstration of both a physical and a chemical reaction by solidification processes to be used for land disposal.

### The QFXX® Process

The QFXX® process applies uniformly to both organic and inorganic wastes, and consists of the mechanical and physical blending of the waste stream, our proprietary chemical (QFXX®), and a pozzolonic material such as fly ash or kiln dust. In general, viscosity of the waste residual is the only limiting factor to this process. Pretreatment techniques may be required for extremely acidic or viscous type wastes. A physio-chemical reaction occurs during mixing, involving hydration, chemi-sorption, molecular cross-linking, and other reactions that result in a monolithic material with high structural strength and insignificant leaching potential. For example, strengths in excess of 4,000 psi have been achieved on organic sludges.

The Process equals or outperforms competitive solidification processes in limiting volume expansion in the solidified waste material. With disposal charges at landfills based on volume, this translates directly in dollar saving in disposal activities. In one test, we were able to solidify a 97% organic, oily waste stream with only a 50% increase in volume. In another, with a 30% PCB-contaminated soil, we achieved a 15% reduction in volume with a 28-day compressive strength of 3,250 psi.

The process will reduce most wastes with up to 35% organic content (by weight) by roughly 15% of original volume. Moreover, it has demonstrated the ability to yield a solidified mass which exceeds the treatment requirements imposed by the United States EPA strict multiple extraction testing.

Representative of waste materials successfully treated by the Process are organic contaminated soils, electroplating sludges, paint sludge wastes, API separator oils and sludges, petroleum tank bottoms, PCBs, aromatic compounds, and incineration by-products. The strength and integrity of the solidified mass results in a 28-day unconfined compressive strengths of up to 5,500 psi. By alteration of mix design, the processed waste can be poured as a plastic solid much like concrete to either be cast into blocks or to stabilize in a soil-type texture. In either form, the resulting low solubility reduces leachate potential to a negligible degree.

In most cases, the mix formulation can be modified to fit specific waste, to enable that waste to take an active role in the cementation phase of stabilization. Some wastes will function as chemical reagents assisting in their own stabilization by contributing to physical hardening and, thereby, reducing or eliminating permeation and leaching characteristics. Permeability, and hence leaching rates, decrease exponentially with increasing mechanical strength development.

### QFXX® Process Chemistry

The QFXX® solidification process fixes and microencapsulates hazardous or toxic waste with proprietary chemicals (collectively referred to herein as "QFXX<sup>SM</sup>") and a fixing agent containing a cementitious or pozzolonic substance. The efficacy of the process is enhanced by QFXX® to such an extent that, unlike many conventional waste solidification processes, the Process can fix both inorganic and organic wastes in liquid, solid, or slurry form.

Upon proper introduction of the waste materials, the fixing agent and QFXX®, a sequence of cementation processes is initiated.

1. Calcium silicates begin to decompose, calcium oxide and silica begin to dissolve, and calcium hydroxide and a calcium silica gel forms.
2. Supersaturation of calcium hydroxide then occurs with its needle-like crystals generated within the gel of hydrated calcium silicate.
3. QFXX® increases the viscosity of the mixture, acting as an effective interparticle lubricant, thus accelerating the homogenization of the mixture while, at the same time, decelerating the diffusivity of every component participating in the cementation reaction.

**Quad Environmental Services, Inc.**  
**In-Plant Waste Treatment and Solidification Services**  
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### Characteristic Wastes

The second category of wastes are hazardous if they exhibit one or more of four characteristics identified in 40 CFR 261, Subpart C. These characteristics are:

- Ignitability:** Wastes which have a flash point of less than 140° F. Wastes with this characteristic are labeled as D001 wastes.
- Corrosiveness:** Wastes which have a pH of less than 2.0 or greater than 12.5 are considered corrosive and are labeled as a D002 waste.
- Reactivity:** Wastes which react violently with water or are unstable or generate toxic gases when mixed with water or acid. Specifically identified are wastes which contain cyanide or sulfides, which will react when exposed to materials with a pH of between 2.0 and 12.6. Also included are certain explosives and materials which may detonate at standard temperature or pressure.
- Toxicity:** (also referred to as extraction procedure, or EP toxic)- Wastes which leach one or more of a specified list of 40 metals, herbicides, pesticides and other chemical compounds.

As long as a characteristically hazardous waste exhibits one of the four hazards, it must be managed, handled, transported and disposed of in the same manner as listed hazardous waste.

Unlike Listed wastes, Characteristic wastes may be treated to remove the hazard characteristic or characteristics. Upon proper treatment and removal of hazard characteristics, these wastes are no longer hazardous and therefore are no longer regulated as hazardous wastes. They may be disposed of in a non-hazardous waste facility (may require prior state environmental regulatory agency approval). No hazardous waste manifest is required. A general transporter may be used.

### Fixation/Stabilization

Traditionally, certain waste materials have been "fixed" or "stabilized" by the addition of certain inert additives such as fly ash or flue dust. These materials assist by absorbing liquids and moisture. Unfortunately, often little real chemical or structural change occurs when these materials are added. Therefore, toxic materials can escape when materials stabilized in this manner are exposed to certain environmental factors. The Quad Technology, in contrast, combines chemicals, and pozzolanic chemistry to assure a structural change in the material processed. Once the reactions have all moved to completion, toxics are bound up and cannot escape into the environment, even under intense exposure. Under its current regulations, the US EPA has defined "stabilization" to be a chemical process which changes the chemical composition and permanently binds potentially leachable hazardous components of industrial or hazardous wastes. Stabilization, defined thus, has been declared the best demonstrated available technology (BDAT) for treating certain listed and characteristic hazardous wastes.

### Chemical Fixation

The Quad technology is chemical fixation based upon pozzolanic chemistry. Chemical fixation is not to be confused with simplistic solidification/stabilization, which often is ineffective in treating wastes for land disposal under the new regulations.

Quad's Technology utilizes pozzolanic materials and patented proprietary liquid reagents. The technology offers three distinct advantages:

1. Low treatment cost
2. Applicability to a broad range of waste materials, both organic and inorganic
3. Little or no increase in volume results from treatment

The 1984 Amendments to the Resource Conservation and Recovery Act of 1976 contain provisions that no free liquids, particularly organic liquids, can be placed in landfills. Strict groundwater standards also mandate that no pollutants migrate outside the disposal unit boundary at a waste management facility.

**Quad Environmental Services, Inc.**  
**In-Plant Waste Treatment and Solidification Services**  
Page 4

### The Treatment and Disposal of Wastes

In 1984, the U.S. Congress passed and the president signed into law, an amendment to the Resource Conservation and Recovery Act of 1976. The major thrust of the amendment was to control the improper land-based disposal of hazardous wastes. Resulting from this amendment, Congress instructed the Environmental Protection Agency (EPA) to consider the safe and proper means of the disposal of numerous waste materials, and to pass regulations covering both their treatment and disposal. Since the focus of this amendment was on eliminating improper use of land-based disposal, this part of the act became known as the "Land Ban".

"Land Ban" regulations are the culmination of the mandate imposed on the EPA by Congress. These rules dictate the specific disposal alternatives for hazardous wastes identified by the Agency. Many wastes are prohibited from disposal in or on the land altogether. Others must be treated, reducing toxicity to below specified levels. The treatment requirements stress destructive processes such as incineration, bio-degradation, and chemical detoxification. The regulations also recognize the appropriateness of chemical fixation as a method of treatment. Some specific wastes require stabilization/solidification of the residues from destructive processes as a final assurance of safe disposal.

Quad Environmental Services has successfully provided detoxification, immobilization and chemical fixation technology on both hazardous and non-hazardous wastes. Quad utilizes, under license, a proprietary process, which has been successfully deployed for more than 10 years. The company employs specially designed equipment to treat the materials, safely and efficiently and in concert with existing regulations at its customer's sites.

The Quad QFXX<sup>®</sup> chemical fixation technology has been used on over 700 different waste streams, all of which were successfully solidified. More than 400 have been "chemically fixed" in laboratory bench scale testing. More than 100 have been proven in field applications. The experience has been codified in an extensive database which is used in pre-screening client's potential waste streams. Appropriate use of the technology is assured by database comparisons and laboratory testing prior to actual application.

### Waste Classification

When the EPA published regulations pursuant to the Resource Conservation and Recovery Act, one of the first steps was to identify what was meant by hazardous waste. The agency generally classified wastes into two categories, those wastes which are considered hazardous by definition, and those which are hazardous because they have one or more characteristics which make them potentially harmful to human health or the environment.

### Listed Wastes

The former are referred to as "listed wastes", and are specifically identified in the Code of Federal regulations (40 CFR) Part 261, Subpart D. Listed wastes are classified into three groups,

1. those which come from non specific sources (designated as "F" wastes, and numbered F001 through F028 in the tables included in 40 CFR 261.31),
2. those which come from specific sources (designated as "K" wastes, numbered K001 through K087 in the tables included in 40 CFR 261.32) and
3. those which are discarded or spilled chemical products which contain certain designated chemicals as their single active ingredient ("P" or "U" wastes included in the tables of 40 CFR 261.33).

Generally, these (listed) wastes are always hazardous, however, procedures exist for changing the status or "delisting" the wastes (40 CFR 261.31 or 261.32). Unless delisted, listed wastes and mixtures containing listed wastes remain hazardous, irrespective of treatment. They must be manifested as hazardous, shipped via qualified and licensed hazardous waste transporters, and shipped only to permitted hazardous waste disposal facilities.

**Quad** Environmental Services, Inc.  
**In-Plant Waste Treatment and Solidification Services**

Page 3

## About Quad Environmental Services

Quad Environmental Services, Inc. is a highly responsive and creative "hands on" environmental service company providing specialized industrial services for hazardous materials. Management individuals with broad backgrounds in environmental matters formed Quad Environmental Services in 1993. Their experience is practical, not just theoretical. Together, the founders have more than 70 years experience in handling and dealing with hazardous products and waste materials. As both generators and disposers, experiences include transporting, handling, treating, processing, recycling, reclaiming and disposing of thousands of different waste materials. The management of Quad Environmental views clients' problems in the same light as if they were their own, by searching for the most practical & economical solution.

## In-Plant Waste Treatment and Solidification Services

Quad provides on-site waste treatment, converting characteristically hazardous wastes to a nonhazardous state through its QFXX<sup>®</sup> technology. The USEPA uses the term stabilization in its regulations to describe a chemical process which changes the chemical composition of waste and permanently binds potentially hazardous and leachable components. The QFXX<sup>®</sup> technology results in the permanent stabilization of wastes.

## Frequently Asked Questions About Treatment of Hazardous Wastes Using Quad's QFXX<sup>®</sup> Process

*A waste generator can't treat hazardous waste on his plant site unless he has an EPA treatment, storage and disposal permit, can he?*

**Yes he can!** - As explained in **Processing of Wastes On Site, Regulations & Permitting**, page 10, not only does the preamble to the March 24, 1986 Federal Register state that "of course, no permitting would be required if a generator chooses to treat their hazardous wastes in the generator accumulation tank or containers in conformance with the requirement of §262.34 and sub-parts J or I of part 265."

*If they are properly treated, can hazardous wastes be handled and disposed of as non-hazardous?*

**Yes** - As more thoroughly discussed in **Waste Classification and Processing of Wastes On Site, Regulations & Permitting**, wastes which are hazardous due to their "characteristics" may be treated so as to eliminate the hazard. Once the hazard is removed, the waste is no longer a hazardous waste.

*What is a hazardous waste, what makes it so and what is the difference between a listed and a characteristic hazardous waste?*

See **Waste Classification**, page 3 for a full explanation regarding hazardous wastes.

*How do I go about having Quad Environmental Services treat my waste?*

Provide us a representative composite sample of the material and a certification that the material is neither a "Listed" waste, nor contains any "Listed" waste. We will then test the material to determine the appropriate QFXX<sup>®</sup> formulation and the treatment procedures. To assure treat-ability, the treated sample will be analyzed for hazard characteristics by an independent laboratory. We will provide you with an estimate or quote to perform the service. If you select us to perform the work, we will then request approval from the necessary regulatory agencies to dispose of the treated material in a non-hazardous (Subtitle D) landfill. In addition, we will submit the necessary information to a non-hazardous landfill, so that they can approve receipt of the treated material.

When we perform the solidification work, we will arrive at your facility, with our personnel, equipment and formulations. We will perform the stabilization on your site, and following a reasonable "cure" time, we will have the material shipped to the selected non-hazardous landfill.

**Quad** Environmental Services, Inc.  
**In-Plant Waste Treatment and Solidification Services**  
Page 2

**Contents**

About Quad Environmental Services ..... 1

In-Plant Treatment Waste Treatment and Solidification Services ..... 1

Frequently Asked Questions About Treatment of  
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Waste Classification ..... 4

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**Quad** Environmental Services, Inc.

---

10201 Lucore Street  
Houston, Texas 77017

**In-Plant Waste Treatment  
and  
Solidification Services**





**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Attachment  
5**

**PHOTOGRAPHIC DOCUMENTATION**

**INTERNATIONAL GALVANIZERS**

**JUNE 22 – JULY 2, 2010**

**CEI LQG**



**INVESTIGATION # 828170**

**EPA ID# TXD050293794**

**TCEQ ID# 30568**

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## PHOTOGRAPHIC DOCUMENTATION

SITE NAME:	REGULATED NUMBER:	INVESTIGATION NUMBER:
Industrial Galvanizers	RN100634120	828170
 <p>The photograph shows three large drums of used oil. From left to right: a black drum with a funnel on top and a yellow 'WASTE OIL' label; a red drum with a yellow 'WASTE OIL' label; and a blue drum with a yellow 'WASTE OIL' label and the text 'USED OIL FILTERS' printed on it. A date stamp '06/22/2010' is visible in the bottom right corner of the image.</p>		DESCRIPTION: View of used oil area. No compliance issues noted.
 <p>The photograph shows a large, white, cylindrical emergency storage tank. The words 'EMERGENCY STORAGE TANK' are printed in black on the side of the tank. A date stamp '06/22/2010' is visible in the bottom right corner of the image.</p>		DESCRIPTION: View of the hazardous waste tank, waste management 006. The tank and secondary containment appeared to be in good condition with no leaks observed.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## PHOTOGRAPHIC DOCUMENTATION

SITE NAME:	REGULATED NUMBER:	INVESTIGATION NUMBER:
Industrial Galvanizers	RN100634120	828170



**DESCRIPTION:**  
View of spent acid sludge container than is involved in the on-site de-neutralization process.



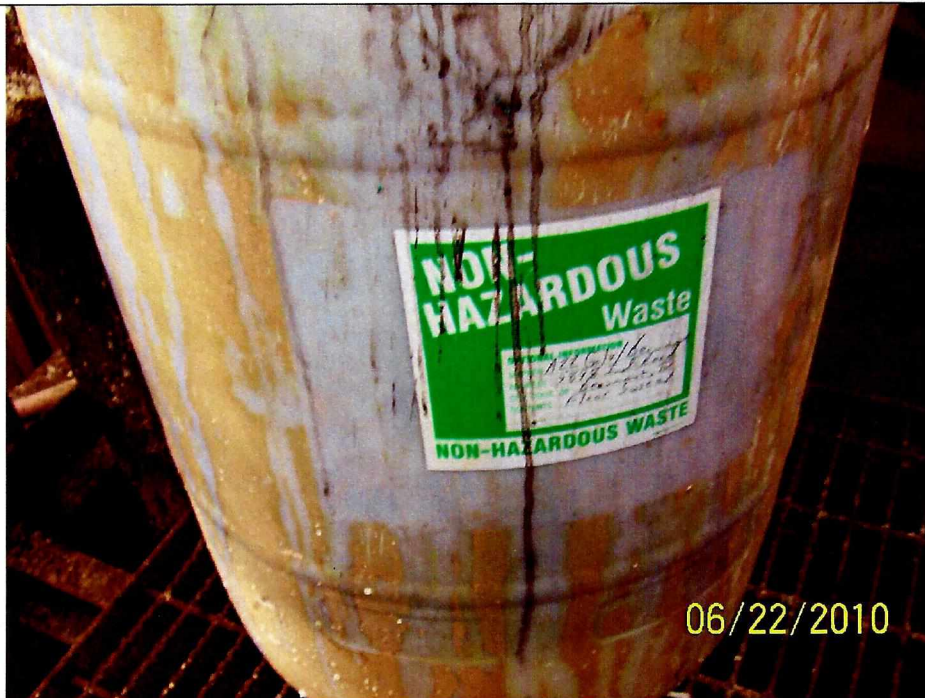
**DESCRIPTION:**  
Affixed label of roll-off box above showing an accumulation date and proper information.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
PHOTOGRAPHIC DOCUMENTATION

SITE NAME:	REGULATED NUMBER:	INVESTIGATION NUMBER:
Industrial Galvanizers	RN100634120	828170



DESCRIPTION:  
View of inside spent acid pickling bath with debris present.



DESCRIPTION:  
Affixed label on container reserved for debris in photograph above. This was recently added as waste generation code 00183191.

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Attachment  
6**

**EXIT INTERVIEW**

**INTERNATIONAL GALVANIZERS  
JUNE 22 – JULY 2, 2010  
CEI LQG  
INVESTIGATION # 828170  
EPA ID# TXD050293794  
TCEQ ID# 30568**

## TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name		INTERNATIONAL GALVANIZERS, Inc		TCEQ Add. ID No.		30568	
Investigation Type		Contact Made In-House (Y/N)	Y	Purpose of Investigation		RCRA Compliance	
Regulated Entity Contact		Robby McKinney		Telephone No.	409-842-0216	Date Contacted	6/10/10
Title		Plant Mgr		Fax No.	409-842-5016	Date Faxed	N/A

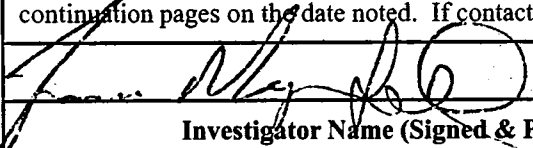
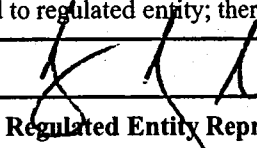
NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue		For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	AV		TANK RECORDS w/ GAPS (DATES), MISSING INITIALS, MISSING YEAR, INCONSISTENT
2	AV		NON-HAZ HAZARD ADJACENT TO SULFURIC BATH
3	AV		STORAGE & NEUTRALIZATION PROCESS w/ "Tank 005" in Pool of Acid

<sup>1</sup>Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

	6/22/10		6/22/10
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

Bryan W. Shaw, Ph.D., *Chairman*  
Buddy Garcia, *Commissioner*  
Carlos Rubinstein, *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 31, 2010

**CERTIFIED MAIL 7009 3410 0000 2093 4136**  
**RETURN RECEIPT REQUESTED**

Mr. Bobby McKinney, Plant Manager  
AZZ Galvanizing – Beaumont  
5898 Industrial Road  
Beaumont, Texas 77705

**Re: Notice of Violation for the IHW Compliance Investigation at:**  
**AZZ Galvanizing, 5898 Industrial Road, Beaumont (Jefferson County), Texas**  
**RN100634120; TCEQ ID No. 30568; EPA ID No. TXD050293794; Investigation No. 828170**

Dear Mr. McKinney:

On June 22 – July 2, 2010, Mr. James Mayfield of the Texas Commission on Environmental Quality (TCEQ) Beaumont Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for industrial hazardous waste. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **September 30, 2010**, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules." Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at (800) 490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify Beaumont Region Office by September 10, 2010. At that time, **Mr. Derek Eades, Waste Section Manager**, will schedule a violation review meeting to be conducted by **September 21, 2010**. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation

REPLY TO: REGION 10 • 3870 EASTEX FWY. • BEAUMONT, TEXAS 77703-1830 • 409-898-3838 • FAX 409-892-2119

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

printed on recycled paper using soy-based ink



Mr. Bobby McKinney  
August 31, 2010  
Page 2

Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. James Mayfield in the Beaumont Region Office at (409) 898-3838.

Sincerely,

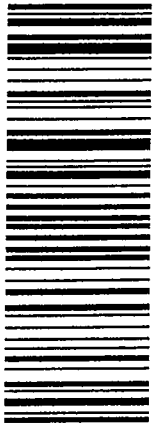


Derek Eades, Waste Section Manager  
Beaumont Region Office

DE/JM/se

Enclosures:     Summary of Investigation Findings  
                    *Obtaining TCEQ Rules*

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.  
**CERTIFIED MAIL™**



7009 3410 0000 2093 4136  
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Sent To Street, or PO Box City, State <b>Mr. Bobby McKinney, Plant Manager</b> <b>AZZ Galvanizing - Beaumont</b> <b>5898 Industrial Road</b> <b>Beaumont, Texas 77705</b>		

**Sent to Austin**  
 AUG 31 2010  
**TCEQ - Region 10**  
**Beaumont**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**Mr. Bobby McKinney, Plant Manager**  
**AZZ Galvanizing - Beaumont**  
**5898 Industrial Road**  
**Beaumont, Texas 77705**

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 if YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

7009 3410 0000 2093 4136 JM NOV #828170/ae

## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN106989759

**Name:** FORMER SERVICE STATION

**Primary Business:** No primary business description on file.

**Street Address:** FANNETT RD, BEAUMONT TX 77705

**County:** JEFFERSON

**Nearest City:** BEAUMONT

**State:** TX

**Near ZIP Code:** 77705

**Physical Location:** FANNETT RD DOLORES RD

### Affiliated Customers - Current

Your Search Returned **1** Current Affiliation Records ( [View Affiliation History](#) )

*The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.*

#### 1-1 of 1 Records

CN Number	Customer Name	Customer Role(s)	Details
<a href="#">CN604473421</a>	WALTER KYLES JR INSURANCE	OWNER	

### Industry Type Codes

Code	Classification	Name
No NAICS or SIC Codes on file.		

### Permits, Registrations, or Other Authorizations

There is **1** program and ID for this regulated entity.

#### 1-1 of 1 Records

Program	ID Type	ID Number	ID Status
LEAKING PETROLEUM STORAGE TANKS REMEDIATION	ID NUMBER	<a href="#">117939</a>	INACTIVE

## Central Registry

*The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.*

Detail of: **Leaking Petroleum Storage Tanks Remediation ID Number 117939**

For: **FORMER SERVICE STATION (RN106989759)**

FANNETT RD, BEAUMONT

ID Number Status: **INACTIVE**

Responsible Parties: **WALTER KYLES JR INSURANCE (CN604473421)** [View Compliance History](#)

Now Known As:

Mailing Address: Not on file

---

### Related Information:

[Correspondence Tracking](#)

[ID Number Information](#)

There is no information related to this ID Number in the following categories:

**Commissioners' Actions**

**Effective Enforcement Orders**

**Criminal Convictions**

**Proposed Enforcement Orders**

**Complaints**

**Discharges**

**Emergency Response Events**

**Emission Events**

**Fish Kills**

**Other Incidents**

**Investigations**

**Periodic Reports**

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Statewide Links: [Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

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[Customer Search](#)[RE Search](#)[ID Search](#)[Search Results](#)[ID Number Detail](#)[TCEQ Home](#)[Query Home](#)

## Central Registry

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For: **FORMER SERVICE STATION (RN106989759)**

FANNETT RD, BEAUMONT

ID Number Status: **INACTIVE**

Responsible Parties: **WALTER KYLES JR INSURANCE (CN604473421)** [View Compliance History](#)

Now Known As:

Mailing Address: Not on file

## Correspondence Tracking

Tracking No.	Received/Sent	Direction	Type	Subject	Due Date	End Date	Document Date	Method
6291318	03/31/2010	OUTGOING	NLR			03/31/2010	03/31/2010	
6168821	02/08/2010	INCOMING	FSC			03/31/2010	01/28/2010	
6291315	09/16/2009	OUTGOING	RR - CAR			09/16/2009	09/16/2009	
6291316	09/16/2009	OUTGOING	FINAL			09/16/2009	09/16/2009	
6291317	09/16/2009	OUTGOING	RR - CAR			09/16/2009	09/16/2009	
6168818	08/25/2009	INCOMING	RBA			09/16/2009	08/11/2009	
6168819	08/25/2009	INCOMING	SCR			09/16/2009	08/11/2009	
6168820	08/25/2009	INCOMING	PROP ACT13			09/16/2009	08/11/2009	
6291314	07/13/2009	OUTGOING	RR			07/13/2009	07/13/2009	
6168817	05/21/2009	INCOMING	RQT EXSTN			07/13/2009	05/18/2009	
6291313	05/05/2009	OUTGOING	RR			05/05/2009	05/05/2009	
6291312	05/04/2009	OUTGOING	RR			05/04/2009	05/04/2009	
6291311	04/17/2009	OUTGOING	RR			04/17/2009	04/17/2009	
6291310	03/13/2009	OUTGOING	NLR			03/13/2009	03/13/2009	
6291309	02/25/2009	OUTGOING	RR			02/25/2009	02/25/2009	
6168816	02/23/2009	INCOMING	RQT EXSTN			04/17/2009	02/19/2009	
6168815	01/09/2009	INCOMING	60-DAY FD			03/13/2009	01/09/2009	
6291308	01/09/2009	OUTGOING	LAD			01/09/2009	01/09/2009	
6291307	01/05/2009	OUTGOING	REF - PRIV			01/05/2009	01/05/2009	
6168814	12/30/2008	INCOMING	REL DET			02/25/2009	11/20/2008	
6168813	10/24/2008	INCOMING	REL DET			01/09/2009	10/24/2008	

## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Leaking Petroleum Storage Tanks Remediation ID Number 117939**

For: **FORMER SERVICE STATION (RN106989759)**

FANNETT RD, BEAUMONT

ID Number Status: **INACTIVE**

Responsible Parties: **WALTER KYLES JR INSURANCE (CN604473421)** [View Compliance History](#)

Now Known As:

Mailing Address: Not on file

Legal	Description	Start Date	End Date	Type	Status	Status Date
117939	LEAKING PETROLEUM STORAGE TANK	01/05/2009	09/16/2009	CLEANUP	INACTIVE	09/16/2009

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 16, 2009

### CERTIFIED MAIL

91 7108 2133 3934 5803 7548

Pastor Delbert Mack  
Cathedral of Faith Baptist Church  
3755 Fannett Road  
Beaumont, Texas 77705

Re: Leaking Petroleum Storage Tank (LPST) Case Closure of Subsurface Release of Hydrocarbons at Former Service Station, Fannett Road & Dolores Street, Beaumont (Jefferson County), Texas  
LPST ID No. 117939; Facility ID No. NL95427; Priority 4.2; R-10

Dear Pastor Mack:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon an evaluation with the current guidance and a thorough case file review of the available information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, the site has met closure requirements. Therefore, no further corrective action is necessary. The justification for final closure includes, but is not limited to, the following criteria:

- The maximum soil contaminant concentrations were below health-based target levels.
- There is no apparent threat of explosive vapors.
- No groundwater contaminants were detected.
- The sources have been removed.
- Identified potential receptors do not appear threatened by this release.

Please be advised that all monitor wells which are not now in use and/or will not be used in the next 180 days must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title 16, Texas Administrative Code (TAC), Section 76.1004. A State of Texas Plugging Report (Form No. TCEQ-0055) is required to be submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation, P.O. Box 12157, Capitol Station, Austin, Texas 78711, within thirty (30) days of plugging completion. If you have any questions regarding the future use of an existing monitor well, please contact the Texas Department of Licensing and Regulation at 512/463-7880 or 800/803-9202.

If any monitor well plugging or other necessary site restoration activities will be performed to complete site closure, complete a *Final Site Closure Report* and submit the report to the Central Office in Austin to document actual site closure. For sites eligible for reimbursement through the Petroleum Storage Tank Remediation Fund, written preapproval should be obtained prior to initiation of site closure activities.

Pastor Delbert Mack  
September 16, 2009  
Page 2  
LPST ID No. 117939

Reimbursement claims for activities that are not preapproved will not be paid until all claims for preapproved work are processed and paid.

Please note that the *Final Site Closure Report*, if necessary, will be the last submittal associated with this case. This letter signifies the completion of corrective action associated with the release. No subsequent TCEQ correspondence will be issued in response to the *Final Site Closure Report*.

Should you have any questions, please contact Ms. Trudy Hasan of Darcy Environmental Group (TCEQ Privatization Contractor) at 512/342-8585, extension 204. **Please reference the LPST ID Number when making inquiries.** Your cooperation in this matter has been appreciated.

Sincerely,



Prasanthi Bollineni or Susan Longbine  
PST Privatization Contract Manager  
PST/DCRP Section  
Remediation Division  
Texas Commission on Environmental Quality

PVB/SNL/th2  
117928.fnn.wpd

cc: Mr. Walter Kyles, Jr.  
Walter Kyles Jr. Insurance  
2875 Washington Blvd.  
Beaumont, Texas 77705



Texas Commission on Environmental Quality  
INTEROFFICE MEMORANDUM

TO : FILE

DATE: November 21, 2008

Updated January 21, 2009

Updated March 17, 2009 (EM2)

Updated April 30, 2009

Updated June 19, 2009

Updated September 9, 2009

THRU : Prasanthi Bollineni or Susan Longbine, TCEQ On Site Supervisor  
David Bratberg, Senior Project Manager, Darcy Environmental Group

FROM : Trudy Hasan, Case Coordinator, Darcy Environmental Group

RE : File Review of Subsurface Release of Hydrocarbons at Former Service Station, Fannett Road & Dolores Street, Beaumont (Jefferson County), Texas  
LPST ID No. 117939; Facility ID No. NL95427; Priority 4.2; R-10

This CFM has been updated to reflect the change to Chapter 334 Rule.

**Release Determination** (RDR ID 17731)

- July 2008 - Two 1,000-gallon gasoline USTs were removed along with adjacent dispensers. Notification, certificate of destruction, and amended registration included.
- Soil samples maximum (ppm) native:
  - benzene 0.675 ppm (South Tank, East End, 7/1/08) - exceeds 334 action level
  - BTEX 1.49 ppm (South Tank, East End, 7/1/08)
  - MTBE <0.020 ppm (all)
  - C<sub>12</sub>-C<sub>28</sub> <50 ppm (all)
  - PAH NA.
- The excavated backfill contained TPH >C12 above screening levels: **4,706 ppm**. This sample was not further analyzed for PAHs. The excavated material was placed back in the former tankhold.
- No tankpit water was observed.
- Eco Checklist completed: yes, meets criteria
- soil > action level for benzene; no PAH analysis on elevated C>12.
- LADscreen issued 01/9/09 to Walter Kyles Jr. with several deficiency comments.
- *Although the RP for the gasoline release is Walter Kyles, Jr., the current landowner (the church) completed the Plan A Assessment in July 2009 in conjunction with the diesel release described below.*

**Release Determination #2** (RDR rec'd 12/30/08)

- October 2008 - four diesel USTs located ~200 feet southwest of the former gasoline tankhold were removed. There was no evidence of piping or dispensers, suggesting that the diesel dispensers were located over the tanks.
- BTEX and MTBE were <SQLs in all native soil samples. C12-C28 concentrations detected above 100 ppm in several samples; maximum was 431 ppm in Tank #4 Mid. No PAH analysis was conducted on any of the soil samples.
- The excavated material, containing 0.138 ppm benzene was returned to the former tankhold.
- PAH data is needed to determine if action levels are exceeded. Issued return letter 2/25/09 to Pastor Delbert Mack, Sr. of Cathedral of Faith Baptist Church.
- *Both the gasoline and diesel source areas were assessed in July 2009 (Plan A).*

**Site Characteristics**

- Former UST facility (unregistered); currently a vacant lot at the southwest corner of Fannett and Dolores Street. The Cathedral of Faith Baptist Church, *located to the east of the source areas*, recently acquired the vacant lot and removed the diesel tanks. The gasoline tanks had been removed earlier by the previous owner Walter Kyles Jr. The UST systems had been out of service for many

September 9, 2009

- years prior to their removal.
- 0% impervious cover currently.
- *Future use is anticipated to be a paved parking lot for the church.*
- *Surrounding land use is mostly residential. To the east is the church and a high school.*
- *The site lithology consists of mostly silty clay with some sand to 24' bgs (Beaumont Formation).*

#### **Soil Assessment**

- *5 soil borings drilled; 3 completed as monitoring wells. MW-1, MW-2, MW-3, and SB-1 were drilled in and around the former gasoline tankhold source area. SB-2 was drilled in the former diesel tankhold (near middle of Tank #4) for PAH sampling.*
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- *The gasoline and diesel source areas have been adequately assessed, and remaining concentrations are below health-based targets.*
- *A vapor survey indicated no threat of explosive vapors (no utilities in the immediate vicinity).*
- *All soil exposure pathways are closed.*

#### **Groundwater Assessment**

- *Three monitoring wells installed around the former gasoline UST system.*
- *DTW is 6.3' to 7.2' btoc. Wells are properly screened 4'-24' bgs.*
- *The gradient appears to be to the north-northeast based on initial gauging data.*
- *No BTEX, MTBE, or TPH concentrations were detected in the groundwater samples collected on 6/23/09.*
- *There is no documented impact to groundwater.*

#### **Receptors and Site Priority/Category**

- *Site is located over the Beaumont Formation; future use is not likely.*
- *One industrial water supply well was reported about 1,800 feet downgradient (NNE) of the site. It is screened 65'-85' bgs and current status is not known. Since groundwater is not impacted, the water well is not threatened.*
- *The City of Beaumont provides water to the area.*
- *Subsurface utilities are >100 feet from the source areas and not threatened.*
- *Priority 4.2; Category II (but no groundwater impact).*

#### **Recent Submittals**

Extension Request (rec'd 2/24/09)

- Request (from the CAS) states that the site is a large property which included two sets of USTs. Requesting a 120 day extension from 01/09/09 in order to evaluate both sets of tanks at the same time- more cost effective for the Cathedral of Faith Baptist Church (purchaser of the property). Grant extension- issue fax directing that the site be re-evaluated under 334 and a written response submitted within 60 days of the date of the fax. Fax issued 4/17/09.

None (phone call 4/29/09)

- The church called requesting specific direction on the next step(s) at this site. Technically, there are two Responsible Parties, although the church may complete the necessary work for both releases. We have received no response from Mr. Kyles regarding the 01/09/09 ladscreen letter. Issue new letter to him requesting completion of a Plan A RBA for the gasoline tankhold release, cc to Pastor Mack.
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September 9, 2009

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- The Church has hired Apollo as their consultant. 90-day extension request will be approved. *Fax issued 7/13/09.*

*RBA, SCR, PA13 (rec'd 8/25/09)*

- *A Plan A Assessment of the gasoline and diesel source areas shows no impact to groundwater. This is a Priority 4.2 case. Closure is appropriate since soil pathways are closed. Issue CARF to plug the wells and final letter, cc to Walter Kyles Jr.*

**Conclusions/Recommendations**

- The unregistered gasoline and diesel USTs, located about 200 feet apart from each other, have been removed. *Technically, there are two Responsible Parties, but the church completed the necessary work for both releases.*
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117939.wpd

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117939.wpd

LPST 117939-RP  
RPR

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
PETROLEUM STORAGE TANK DIVISION  
CORRESPONDENCE IDENTIFICATION SHEET

Date: July 21, 2009 LPST ID No.: 117939  
Site Name: Former service station Facility ID No.: N/A  
Site Address: Fannett Rd. & Dolores St.  
Beaumont, TX 77705

*Handwritten signature/initials*

This checklist **must** accompany all correspondence submitted to the RPR Section and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence which you have submitted to the RPR Section. Check all boxes that apply if you are submitting more than one type of correspondence. If you cannot find an appropriate category, please complete the "other" section.

PROPOSALS		
<input type="checkbox"/> Initial Abatement (1)	<input type="checkbox"/> Tank Removal (2)	<input type="checkbox"/> Excavation (3)
<input type="checkbox"/> Waste Treatment (4)	<input type="checkbox"/> Site Assessment (5)	<input type="checkbox"/> Aquifer Testing (6)
<input type="checkbox"/> VES/Sparge Testing (7)	<input type="checkbox"/> Qtrly. GW Monitoring (8)	<input type="checkbox"/> CAP Prep. (9)
<input type="checkbox"/> GW Extrac./Treatment (10)	<input type="checkbox"/> Soil Vapor Extrac. (11)	<input type="checkbox"/> Operation & Main. (12)
<input checked="" type="checkbox"/> Site Closure (13)	<input type="checkbox"/> Plan A Risk Ass. (14)	<input type="checkbox"/> Plan B Risk Ass. (15)
<input type="checkbox"/> Semi-annual GW Mon. (16)*	<input type="checkbox"/> Annual GW Mon. (18)	<input type="checkbox"/> Product Recovery (19)
<input type="checkbox"/> Other proposal _____		

*RBA  
SCR  
Prop 13*

REPORTING FORMS	
<input checked="" type="checkbox"/> Assessment Report Form (TNRCC-0562)	<input type="checkbox"/> LPST Case Questionnaire
<input type="checkbox"/> Product Recovery Report Form (TNRCC-0016)	<input type="checkbox"/> Release Report Form (TNRCC-0621)
<input checked="" type="checkbox"/> Site Closure Request Form (TNRCC-0028)	<input type="checkbox"/> Monitoring Event Summary and Status Report (TNRCC-0013)
<input type="checkbox"/> Final Site Closure Report Form (TNRCC-0038)	<input type="checkbox"/> Priority 4 LPST Case Closure Request Form (TNRCC-0461)
<input type="checkbox"/> Other form _____	

REPORTS		
<input type="checkbox"/> Tank Closure/Removal	<input type="checkbox"/> Plan A Risk Assessment	<input type="checkbox"/> Annual Groundwater Monitoring
<input type="checkbox"/> O&M/Performance Mon.	<input type="checkbox"/> Plan B Risk Assessment	<input type="checkbox"/> CAP Installation/Modification
<input type="checkbox"/> Property Divestiture/Phase I ESA	<input type="checkbox"/> Corrective Action Plan (CAP)	<input type="checkbox"/> Aquifer/Pilot Test Results

MISCELLANEOUS	
<input type="checkbox"/> Off-site access assistance	<input type="checkbox"/> Deadline Extension Request
<input type="checkbox"/> Tank tightness test results	<input type="checkbox"/> Request for State-Lead
<input type="checkbox"/> Request for LPST Waste Code	<input type="checkbox"/> Class V ReInjection Request
<input type="checkbox"/> Notice to Owner/Operator for CAS Services	<input type="checkbox"/> Petroleum-Substance Waste Manifest
<input type="checkbox"/> Notice of Continuation of Groundwater Monitoring	<input type="checkbox"/> Underground Storage Tank Registration Form
<input type="checkbox"/> Notice of Continuation of Operation and Maintenance	<input type="checkbox"/> Aboveground Storage Tank Registration Form
<input type="checkbox"/> Other (anything that does not fit into one of the categories above) _____	

**Received**

\* The proposal for semi-annual monitoring and annual report (Proposal Activity 17) has been discontinued. For semi-annual monitoring, use Proposal Activity 16.

**AUG 25 2009**

**TCEQ  
Remediation Division**

WST LPST/ REPORTS

DARCY ENVIRONMENTAL GROUP

1st: 2nd: 117939 Vol: 001 7/21/2009

BBC: 100078230



**AUG 26 2009**

IBC: 100168329



I attest that all work has been conducted in accordance with accepted industry standards/practices and adhered to TNRCC guidance and rules. I certify that I am aware that misrepresentation of any of the above claims is a violation of 30 TAC 33.4453(b)(1)(E) and that this violation may result in the disciplinary actions set forth in 30 TAC 334.453 and or 334.463 and 334.465.

If a proposal is attached for preapproval, has the proposed work, in part or in whole, already been performed or in progress?  Yes  No

If yes, what work? \_\_\_\_\_

APOLLO® Environmental Strategies, Inc. 00021 Sept. 29, 2009  
(Registered Corrective Action Specialist) (RCAS Reg. No.) (Expiration date)

*Thomas A. Elms* 8-19-09  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

Thomas A. Elms 00337 Dec. 12, 2009  
(Project Manager) (CAPM Reg. No.) (Expiration date)

*Thomas A. Elms* 8-19-09  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

By signature below, I certify that documents checked above are included.

Delbert A. Mack, Sr. Cathedral of Faith Baptist Church  
(Name of Responsible Party Contact) (Company)

X *Delbert A. Mack, Sr.* 8-11-09  
(Signature) (Date)  
(409) 840-6163 (409) 840-6195  
(Telephone #) (FAX #)



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
PETROLEUM STORAGE TANK PROGRAM  
ASSESSMENT REPORT FORM**

**WHO SHOULD COMPLETE THIS FORM:** This form (TCEQ-0562) should be completed for leaking petroleum storage tank (LPST) sites subject to 30 Texas Administrative Code (TAC) 334 only. LPST sites are subject only to 30 TAC 334 if they were discovered and reported to the agency prior to September 1, 2003. Sites reported to the agency on or after September 1, 2003 are subject to 30 TAC 334 and potentially, to 30 TAC 350 (Texas Risk Reduction Program (TRRP) rules). LPST sites determined to be subject to TRRP should use the Affected Property Assessment Report (APAR) form (TCEQ-10235) to report assessment data to the TCEQ. Please note that all information used to complete TCEQ-0562 (this form) should be obtained according to procedures outlined in the document "Guidance for Risk-Based Assessments at LPST Sites in Texas" (RG-175). Also note that if the Table of Contents (p. 2) of this form is not fully completed, the TCEQ will return the entire form to the responsible party without review. This document must not be altered in any manner. Requested information denoted with "\*" is beyond the minimal requirements for a site assessment as defined by 30 TAC 334.78(a)(5). For sites eligible for reimbursement, attach a workplan(s) and preapproval request(s) for the next appropriate activity.

LPST ID No: 117939 Facility ID No: N/A Site priority: 4.2

Facility Name: Former service station

Facility Address: Fannett Rd. and Dolores St.

City: Beaumont State: TX Zip: 77705


RP Name: Delbert A. Mack

RP Address: 3755 Fannett Rd.

City: Beaumont State: TX Zip: 77705

**I certify that all work has been done in accordance with accepted industry standards and practices and adheres to TCEQ guidance and rules. I am aware that misrepresentation or intentional omission of material information reported on this form is a crime under section 7.149 of the Texas Water Code, punishable by fine or confinement or both, and also may result in loss of license under TCEQ rules (30 Texas Administrative Code, Chapter 30) and the Texas Water Code (Section 7.303 and Chapter 37).**

APOLLO® Environmental Strategies, Inc. 00021 Sept. 29, 2009  
(Registered Corrective Action Specialist) (RCAS Reg. No.) (Expiration date)

 8-19-09  
(Signature) (Date)

(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

Thomas A. Eims 00337 Dec. 12, 2009  
(Project Manager) (CAPM Reg. No.) (Expiration date)

 8-19-09  
(Signature) (Date)

(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

**By signature below, I certify that I have reviewed this report for completeness.**

Delbert A. Mack Cathedral of Faith Baptist Church  
(Name of Responsible Party Contact) (Company)

 8-11-09  
(Signature) (Date)

(409) 840-6163 (409) 840-6195  
(Telephone #) (FAX #)

Mailing address: TCEQ/PST - RPR  
MC -137  
P.O. Box 13087  
Austin, TX 78711-3087

DARCY ENVIRONMENTAL GROUP

# SITE ASSESSMENT

LPST ID: 117939  
 Site Name: Former service station  
 Site Location: Beaumont, TX

## TABLE OF CONTENTS

Item	Title	Page	(■) Completed
Worksheet E	Executive Summary .....	3	■
Worksheet 1.0	Site Description .....	4	■
Worksheet 2.0	Land Use .....	5	■
Worksheet 3.0	Water Well Inventory .....	6	■
Worksheet 4.0	Receptor Survey .....	7-8	■
Worksheet 5.0	Site Assessment History .....	9	■
Worksheet 6.0	Tank System Characterization .....	10	■
Worksheet 7.0	Soil Assessment .....	11-12	■
Worksheet 8.0	Groundwater Assessment .....	13-14	■ NA □
Worksheet 9.0	Vapor Assessment .....	15	■
Worksheet 10.0	Surface Water Assessment .....	16	■ NA □
Worksheet 11.1-5	Plan A Evaluation .....	17-22	■
Worksheet 12.0	Site Prioritization .....	23-25	■
Abbreviations	.....	26	
			(■) Enclosed
Attachment 1	Site plan illustrating location of entire former/current UST/AST system(s), subsurface utilities, limits of excavation, system removal or repair, sampling points, and surface cover .....		■
Attachment 2	Vicinity map or aerial photograph illustrating surrounding land use and receptors identified within a 500-foot radius .....		■
Attachment 3	USGS topographic map with plotted water well locations .....		■
Attachment 4	Copies of completion details and water well drillers reports for located wells (0.5 mile radius) .....		■
Attachment 5	Site plan(s) illustrating former/current UST/AST system(s) and all (i.e., soil, groundwater, vapor, surface water) sampling points .....		■
Attachment 6	Soil contaminant concentration maps .....		■
Attachment 7	Groundwater gradient map .....		■ NA □
Attachment 8	Groundwater contaminant concentration maps .....		■ NA □
Attachment 9	Biodegradation Indicator Distribution Map* .....		□ NA ■
Attachment 10	Soil Gas Survey Maps* .....		□ NA ■
Attachment 11	Vapor Contaminant Concentration Map .....		■
Attachment 12	Surface Water Contaminant Concentration Map .....		□ NA ■
Attachment 13	Surface Water Flow Map .....		□ NA ■
Attachment 14	Soil boring logs to include: lithology, field screening, sample locations, well completion details, TNRCC Form 0019 .....		■
Attachment 15	Summary table of all soil, groundwater, surface water, and vapor analytical results, including from all sampling points, and tank removal or repair activities .....		■
Attachment 16	Summary tables of all gauging data, water level data, NAPL thickness and corrected water level data and well screen interval (if applicable) .....		■ NA □
Attachment 17	Copies of all analytical reports including complete chain-of-custody and quality assurance/quality control documentation .....		■
Attachment 18	Copies of manifests, waste receipts, or other documents necessary to document waste disposition .....		pending
Attachment 19	Photographic documentation .....		
Attachment 20	Proposal for next appropriate action and/or Site Closure Request .....		■

# SITE ASSESSMENT

LPST ID: 117939  
Site Name: Former service station  
Site Location: Beaumont, TX

## EXECUTIVE SUMMARY

Check all applicable boxes.

UST/AST System Status:  Active  Permanently Removed from Service  
 Temporarily Out of Service  Temporarily Indefinitely Out of Service (Variance Due Date: \_\_\_\_\_ )

Current site land use:

vacant  indus./coml.  residential  agricultural  recreational  UST/AST Facility

Sources of Release:  tank(s)  piping  spills  dispenser  Other:

Substance Released:

gasoline  diesel  waste oil  hydraulic fluid  AV gas  jet fuel  Other:

Site Assessment History:

Preliminary/LSA  Groundwater Monitoring  Remedial Action  Emergency Response

Affected environmental media:  surficial soil (<2 ft. BGS)  soil (2 to 15 ft. BGS)  soil (>15 ft. BGS)  
 groundwater  surface water  air

Identified affected receptors:  water wells  basements/structures  habitat  building  underground utilities  surface water  exposed contaminated soil  Other Distance from site (ft.): \_\_\_\_\_

Samples collected  yes  no Abatement initiated:  yes  no Type: \_\_\_\_\_

Identified potential receptors:  water wells  basements/structures  habitat  building  underground utilities  surface water  exposed contaminated soil  Other Distance from site (ft.): \_\_\_\_\_

Depth to first encountered groundwater (ft.) BGS:  >50  15-50  0-15

Presence of NAPLs (ft.):

sheen  0.1-0.5 ft.  0.5-2 ft.  2-5 ft.  >5 ft.  none Recovery Initiated:  yes  no

Current NAPL extent:  on-site  off-site

Dissolved-phase extent:  on-site  off-site  unknown

Groundwater beneficial use category:

Cat. I  Cat. II  Cat. III  Cat. IV  Soils only affected, regional beneficial use can not be established.

Contaminants of Concern Exceed Target Concentrations of Affected media:

Soil (Worksheets 7.0, 11.1-5):  yes  no

Groundwater (Worksheet 8 & 11.1-4):  yes  no

Vapors (Worksheet 9.0):  yes  no

Surface Water (Worksheet 10.0):  yes  no

Site Priority: 1. \_\_\_\_\_ 2. \_\_\_\_\_ 3. \_\_\_\_\_ 4. 2

Recommended Actions:

- a) Affected Receptors Identified - Propose additional corrective action and/or monitoring program.
- b) Site does not exceed Plan A criteria - Submit site closure request form.
- c) Site does not exceed Plan A criteria - Propose verification groundwater monitoring program.
- d) Site exceeds Plan A criteria - Propose corrective action to achieve Plan A criteria.
- e) Site exceeds Plan A criteria - Propose Plan B risk assessment and/or evaluation.

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**SITE DESCRIPTION**

**Location Description**

Facility Name: Former service station  
 Address: Fannett Rd. and Dolores St.  
 Cross-Street: Dolores St.  
 City: Beaumont  
 County: Jefferson  
 Current Site Water Supply: N/A

*Adjacent property*

**Notes:**

**The site is located at the southwest corner of the intersection of Fannett Rd. and Dolores St.**

**Topography**

**Other Comments:**

Terrain:  Flat  Steep  Variable

**Ground Surface Slope**

Direction \_\_\_\_\_ Grade (ft./ft.) \_\_\_\_\_

*Discuss any significant onsite or adjacent significant topographic feature.*

**Local Climate:**

**Other Comments:**

Average Annual Rainfall (in.): 58

Within 100 Year Floodplain:  yes /  no

*Discuss recent (i.e., within the past year) extreme climatic changes. Discuss engineered modifications to floodplain status or designation.*

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**LAND USE**

**PAST, CURRENT, AND FUTURE USE (check all that apply)**

- Past use of site:
  - Commercial/Industrial
  - Residential
  - Agricultural
  - Recreational
  - Vacant
  - UST/AST Facility
- Past Predominant Land Use of the Area:
  - Commercial/Industrial
  - Residential

Describe: service station

- Current use of site:
  - Commercial/Industrial
  - Residential
  - Agricultural
  - Recreational
  - Vacant
  - UST/AST Facility
- Current Predominant Land Use of the Area:
  - Commercial/Industrial
  - Residential
- Type of Residential Area:
  - Minority/Low Income
  - Non-minority/Low Income
  - Other

Describe: vacant lot

- Future use of site:
  - Commercial/Industrial
  - Residential
  - Agricultural
  - Recreational
  - Vacant
  - UST/AST Facility
- Future Predominant Land Use of the Area:
  - Commercial/Industrial
  - Residential

Describe: paved parking lot

**List all facilities (not limited to PST-regulated) within 500 feet of the site that could be a source of contaminants:**

**Other Comments:**

Facility Name & Type: None  
Address:  
Facility No.:  
LPST ID No.:  
Owner/Operator:

Facility Name & Type:  
Address:  
Facility No.:  
LPST ID No.:  
Owner/Operator:

Facility Name & Type:  
Address:  
Facility No.:  
LPST ID No.:  
Owner/Operator:

*Additional facilities may be listed and noted on Attachment 2.*

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**WATER WELL INVENTORY**

**SUMMARY OF WELLS WITHIN 0.5 MILE RADIUS OF THE SITE**

	Total No.	Active No.	Downgradient Direction		
			Total No.	Active No.	No. Screened in Affected Zone
Public/Municipal:	--	--	--	--	--
Industrial:	1	UNK	1	UNK	0
Domestic:	--	--	--	--	--
Agricultural:	--	--	--	--	--

**POTENTIAL RECEPTOR POINTS**

	Closest Downgradient Water Well	Closest Downgradient Well Screened Within Affected Zone
Well No./Designation:	1	None
Distance from Site (ft.):	1818	--
Total Well Depth (ft.):	85	--
Current Use of Water:	Industrial	--
Screened Interval below Ground Surface (ft):	65 - 85	--
Year Constructed:	1982	--

**Comments:** *(Include discussion of any ordinances which prevent or influence the future installation of water wells at the site or surrounding area.)*

The city of Beaumont has ordinances in place which clearly prohibit or severely limit the installation of water supply wells within the city limits. Chapter 28, sec. 28-53a requires "all property owners owning property within the city which is within three hundred (300) feet of a city sanitary sewer or water line ... shall be required to connect to same." Also, On March 22, 2005, the City Council of the City of Beaumont resolved in Ordinance No. 05-031, as duly signed by Mayor Evelyn M. Lord, that "all property located within the corporate limits of the City of Beaumont be established as a municipal setting designation"

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RECEPTOR SURVEY

**Underground Utility Survey**

**Other Comments:**

**Nearest Underground Utility**

Name: N/A  
 Type: storm water drain  
 Depth of Utility: 0' - 3'  
 Distance & Direction  
 From Affected Zone: 120' NW

*Discuss other receptors and indicate on Attachment 2. If affected discuss abatement measures.*

**Nearest Downgradient Utility**

Name: N/A  
 Type: storm water drain  
 Depth of Utility: 0' - 3'  
 Distance & Direction  
 From Affected Zone: 175' NE

**Building Survey**

**Other Comments:**

**Nearest Building**

Name: Starcrest Apartments  
 Type: apartments  
 Distance & Direction  
 From Affected Zone: 213' South

*Discuss nearest and other receptors and indicate on Attachment 2. Buildings should include residences, schools, day care facility, nursing home, etc.*

**Nearest Downgradient Building**

Name: Cathedral of Faith Baptist Church  
 Type: church  
 Distance & Direction  
 From Affected Zone: 220' NE

**Surface Water Hydrology**

**Other Comments:**

**Nearest Surface Water**

Name: N/A  
 Type: canal  
 Distance & Direction  
 From Affected Zone: 4,600' NW

*If affected complete Worksheet 10.0. Describe potential for affected storm water or groundwater discharge to surface water feature.*

**Impacted Surface Water**

Name: None  
 Type: \_\_\_\_\_  
 Distance & Direction  
 From Affected Zone: \_\_\_\_\_

*intermittent creek  
 ~ 0.25 mile south on top of*

**Nearest Downgradient Surface Water**

Name: Neches River  
 Type: stream  
 Distance & Direction  
 From Affected Zone: 17,000' NE

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**HABITAT SURVEY**

**Presence of Sensitive Habitat**

Site located within or affects a sensitive or protected habitat?  yes (explain below)  no

Name:

Location:

Discussion: *Provide the habitat type (wildlife sanctuary, wetlands, etc.), condition, regulatory authority, and other information relative to habitat characterization.*

**SUMMARY AND RECOMMENDED ACTION**

Observed or Potential Impacts	-	Recommended Action
<input checked="" type="checkbox"/> None observed or anticipated	-	No action required
<input type="checkbox"/> Potential for Significant Impact	-	Additional Corrective Action Required (See Attachment 20)
<input type="checkbox"/> Significant Impact Observed	-	Additional Corrective Action Required (See Attachment 20)

**Comments:** *Discuss any emergency abatement and continued corrective action.*



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**SITE ASSESSMENT HISTORY**

**SUMMARY OF PREVIOUS SITE ACTIVITIES**

Typical site activities to be recorded include:

- Preliminary/Limited/Comprehensive Site Assessment
- Emergency Response • Risk/Exposure Assessment • Remedial/Corrective Actions

Types of sampling to be included: • Soil • Groundwater • Surface Water • Vapors

Date Completed	Description of Activity	Sampling and Testing	Result/Impact/Target Cleanup
7/1/08	UST removal and backfilling of hole and ditch (gasoline USTs)	Soil tested for MTBE/BTEX and TPH	Contamination found in soil
10/10/08	UST removal and backfilling of hole and ditch (diesel USTs)	Soil tested for MTBE/BTEX and TPH	Contamination found in soil
6/1/09	Installation of three MWs and two soil boring	Soil tested for MTBE/BTEX and TPH for MWs and tested for PAH and TPH for soil borings	No contamination found
6/23/09	Groundwater sampling of MWs	Groundwater tested for MTBE/BTEX and TPH	No contamination found

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**UST/AST SYSTEM CHARACTERIZATION**

Release Information	Other Comments:
<p><b>UST/AST System Status:</b>  <input type="checkbox"/> Active    <input checked="" type="checkbox"/> Permanently Removed From Service  <input type="checkbox"/> Temporarily Out of Service  <input type="checkbox"/> Temporarily/Indefinitely Out of Service (Due Date: _____ )</p> <p><b>Method of release discovery:</b>  <input checked="" type="checkbox"/> UST Removal    <input type="checkbox"/> Release Detection Equipment  <input type="checkbox"/> Divestiture Assessment    <input type="checkbox"/> Inventory Control  <input type="checkbox"/> System Tightness Testing    <input checked="" type="checkbox"/> Other: Soil sampling and analysis</p> <p><b>Substance released (check all that apply):</b>  <input checked="" type="checkbox"/> Gasoline    <input checked="" type="checkbox"/> Diesel    <input type="checkbox"/> Waste Oil  <input type="checkbox"/> AV Gas    <input type="checkbox"/> Jet Fuel    <input type="checkbox"/> Hydraulic Fluid  <input type="checkbox"/> Other</p> <p><b>Source of release(s):    Date Discovered:</b>  <input type="checkbox"/> Spills/overfills _____  <input type="checkbox"/> Piping _____  <input type="checkbox"/> Dispenser _____  <input checked="" type="checkbox"/> Tank                            <u>7/08 &amp; 10/08</u>  <input type="checkbox"/> Other _____</p>	<p><i>Describe the measures taken to abate the release:</i></p>

Removal Information	Other Comments:
<p>Date(s) of removal(s): <u>7/1/08 &amp; 10/10/08</u>                      Type of removal:  <input checked="" type="checkbox"/> Removal from the ground    <input type="checkbox"/> Closure in place                      Water in tankhold during excavation?    <input type="checkbox"/> yes    <input checked="" type="checkbox"/> no                      Depth of water in tankhold (BGS):  <input type="checkbox"/> &lt;5 ft.    <input type="checkbox"/> 5-10 ft.    <input type="checkbox"/> 11-15 ft.    <input checked="" type="checkbox"/> None                      NAPL:    <input type="checkbox"/> yes    <input checked="" type="checkbox"/> no    Thickness (ft.): _____                      Water Evacuated from tankhold:    <input type="checkbox"/> yes    <input checked="" type="checkbox"/> no                      Volume (gal.): _____                      Groundwater recharged into tankhold:    <input type="checkbox"/> yes    <input checked="" type="checkbox"/> no                      Depth (ft. BGS): _____                      Status of excavation(s):  <input type="checkbox"/> Open with water    <input type="checkbox"/> Open/dry                          Backfilled with impervious cover  <input checked="" type="checkbox"/> Backfilled with no impervious cover                      Type of fill material:  <input checked="" type="checkbox"/> Untreated backfill    <input type="checkbox"/> Treated backfill    <input type="checkbox"/> Other  <input type="checkbox"/> Clean fill - gravel    <input checked="" type="checkbox"/> Clean fill - sandy/clay</p>	<p><i>Provide the maximum contaminant concentrations milligrams per kilograms (mg/kg) of untreated backfill returned to the tankhold(s): Benzene _____ TEX _____ TPH _____ OTHER _____. If a new UST/AST system was installed describe &amp; indicate on Attachment 1.</i></p>

Maximum level of contamination detected in native soils upon completion of removal/repair (mg/kg):				
Chemical of Concern	Sample Date	Sample Location/Depth	Laboratory Method Detection Limit	Maximum Concentration (mg/kg)
Benzene	7/1/08	So. Tank Eastend	0.010	0.675
Toluene	7/1/08	So. Tank Westend	0.010	0.035
Ethylbenzene	7/1/08	So. Tank Eastend	0.010	0.669
Total Xylenes	7/1/08	So. Tank Westend	0.010	0.260
TPH	10/10/08	Tank #4 Mid	50.0	532
Metals	N/A			
VOC	N/A			
Other: MTBE	7/1/08	No. Tank Westend	0.020	<0.020

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**SOIL ASSESSMENT**

**SOIL DATA COLLECTION AND EVALUATION**

Number of soil sampling points:   5  

Method of determination:  Direct Push  Borings  Other: \_\_\_\_\_

Surface cover over affected soil zone (check all that apply):  
 Concrete  Asphalt  Gravel  Dirt  Grass  Other: \_\_\_\_\_

Percent of affected soil zone covered with impervious cover:  
 0-25 %  25-50 %  50-75 %  75-100%

If there is no impervious surface cover, is there public access to the affected surface (0-2 ft.) soil?  yes  no

Affected soil zone thickness (ft.):   8  

\*Affected soil zone surface area dimensions (ft.): \_\_\_\_\_

Maximum depth of contamination exceeding appropriate Plan A risk-based levels:   8   ft. BGS

\*Estimated volume of soil exceeding Plan A target concentration (yd<sup>3</sup>): \_\_\_\_\_

\*Minimum distance from affected soil zone to property boundary:  0-10 ft.  10-50 ft.  50-100 ft.  
 100-300 ft.  300-500 ft.  >500 ft.  Extends beyond property boundary

Waste disposal:  Landfill  On-site treatment  Off-site treatment  
 Other  Pending  None

<b>Maximum level of contamination detected in native soils (mg/kg):</b>						
Chemical of Concern	Sample Date	Sample Depth (ft.)	Sample ID	Laboratory Method Detection Limit	Max Conc. (mg/kg)	Target Cleanup Goals †
Benzene	6/1/09	4' - 6'	MW-1	0.010	<0.010	0.13
Toluene	6/1/09	4' - 6'	MW-1	0.010	<0.010	69
Ethylbenzene	6/1/09	4' - 6'	MW-1	0.010	<0.010	160
Total Xylenes	6/1/09	4' - 6'	MW-1	0.010	<0.010	568
TPH	6/1/09	4' - 6'	MW-1	50.0	<50.0	---
Total Lead	N/A					
Naphthalene	6/1/09	6' - 8'	SB-2	0.500	<0.500	389
Other: MTBE	6/1/09	4' - 6'	MW-1	0.010	<0.010	---
Other: Benzo(a)pyrene	6/1/09	6' - 8'	SB-2	0.200	<0.200	0.0877
Other: Dibenz(a,h)perylene	6/1/09	6' - 8'	SB-2	0.200	<0.200	0.0877

\* Beyond the minimal requirements for a Site Assessment as defined by 30 TAC 334.  
 † Refer to Worksheets 11.1-5 and *Risk-Based Corrective Action for Leaking Storage Tank Sites*, RG-36, Table A-1.

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**\* Geotechnical soil parameters:**

<b>Parameter</b>	<b>Result</b>	<b>Depth</b>	<b>Location/Sample ID</b>	<b>Method of Determination</b>
Dry Bulk Density (g/m <sup>3</sup> ):				
Effective Porosity (%):				
Fraction Organic Carbon (g/g):				
Intrinsic Permeability (cm <sup>2</sup> ):				
Water Content (cm <sup>3</sup> /cm <sup>3</sup> ):				
Other				

**\* Biodegradation Indicators:**

Present spatial distribution of O<sub>2</sub>, CO<sub>2</sub>, CH<sub>4</sub>, etc. levels on map. (Attachment 9)

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**GROUNDWATER ASSESSMENT**

**GROUNDWATER DATA AND EVALUATION**

Groundwater affected by release:  yes  no (If no, complete only the Beneficial Groundwater Use Categories on this Worksheet.)

Site Hydrogeology	Uppermost Zone	Other
Depth to groundwater (ft.)		
Aquifer type (Perched, confined, unconfined)		
*Estimated Aquifer thickness (ft.)		
*Water level fluctuations (± ft.)		
Gradient (ft./ft.)/Direction	/	/
*Saturated hydraulic conductivity (ft./day)		
*Approximate well yield (gpd)		
Lithology		
Geologic Formation		
Major/minor aquifer name		
Total dissolved solids (mg/l)		
Confining layer depth (ft. BGS)		
Confining layer thickness (ft.)		

**Beneficial Groundwater Use Categories**

Mark the potential beneficial use category for the impacted zone and indicate the selection criteria. Complete the appropriate worksheet (11.1-5) for the Category indicated.

<input type="checkbox"/> Category I	<input checked="" type="checkbox"/> Category II	<input type="checkbox"/> Category III	<input type="checkbox"/> Category IV
<input type="checkbox"/> Impacted or threatened water supply well(s)‡	<input checked="" type="checkbox"/> Affected groundwater zone TDS <3,000 ppm, and no beneficial use† is documented within 0.5 miles of the site.	<input type="checkbox"/> Affected groundwater zone TDS 3,000 - 10,000 ppm, and no beneficial use† within 0.5 miles of the site.	<input type="checkbox"/> Affected groundwater zone TDS >10,000 ppm, and no beneficial use† is documented within 0.5 miles of the site.
OR <input type="checkbox"/> Affected groundwater zone TDS <3,000 ppm, and water well(s)‡ or water supply spring within 0.5 miles of the site. OR <input type="checkbox"/> Soils only affected. Regional groundwater beneficial use† cannot be established.	OR <input type="checkbox"/> TDS 3,000 - 10,000 ppm, and beneficial use† is documented within the 0.5 miles of the site.		OR <input type="checkbox"/> Well yield <150 gpd (i.e., affected zone is not considered to have a beneficial use†)

‡ If construction details of water well(s) are unknown or can not be proven, the interval is assumed to be connected.

† Applies to a drinking water source producing from the same or connected interval as the affected groundwater zone.

**Groundwater Sampling Points**

Number of Sampling points: \_\_\_\_\_

Number of permanent monitoring wells: \_\_\_\_\_

Static water levels above screened intervals:  yes  no

**On-Site**  
 (provide well ID)

**\*Beyond Property Boundary**  
 (provide well ID)

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**DISSOLVED-PHASE PLUME**

\*Aerial extent of dissolved-phase plume (ft<sup>2</sup>): \_\_\_\_\_

\*Distance from edge of plume to property boundary if on-site:  <10 ft.  10-50 ft.  50-100 ft.  100-300 ft.  >300 ft.

\*Distance from property boundary to edge of plume if off-site:  <10 ft.  10-50 ft.  50-100 ft.  100-300 ft.  >300 ft.

**Maximum level of contamination detected in groundwater (mg/l):**

Contaminant	Sample Date	Sample ID	Laboratory Method Detection Limit	Maximum Concentration (mg/l)	Target Cleanup Goals†
Benzene					
Toluene					
Ethylbenzene					
Total Xylenes					
MTBE					
TPH					
Naphthalene					
Other					

† Refer to Worksheet 11.1-3 and the *Risk-Based Correction Action for Leaking Storage Tank Sites*, RG-36, Table A1.

**NAPL PLUME**

NAPL Present?  yes  no

On-Site  
(provide well ID)

Thickness  
(ft.)

\*Beyond Property Boundary  
(provide well ID)

Thickness  
(ft.)

Current maximum NAPL thickness (ft.):

NAPL recovery method:  hand bail  passive skimmer  sorbent socks  automated system  none

Volume recovered to date (gals.): \_\_\_\_\_

\*Aerial extent of NAPL plume: (ft<sup>2</sup>) \_\_\_\_\_  beyond property boundary

\*Distance from edge of NAPL plume to property boundary if on-site:  <10 ft.  10-50 ft.  50-100 ft.  100-300 ft.  >300 ft.

\*Distance from edge of NAPL plume from property boundary if off-site:  <10 ft.  10-50 ft.  50-75 ft.  75-100 ft.  >100 ft.

**\* Biodegradation Indicators:**

Present spatial distribution of dissolved Oxygen, dissolved CO<sub>2</sub>, dissolved CH<sub>4</sub>, Fe, SO<sub>4</sub>, or other alternate electron acceptors on isoconcentration map. (Attachment 9)

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**VAPOR ASSESSMENT**

**VAPOR DATA AND EVALUATION**

Known vapor impact:  yes  no

Location:  ambient air  utilities  residences  
 hospital  school/day care  commercial buildings  other:

Lower Explosive Limit (LEL) concentrations:  not measured  measured  calculated<sup>1</sup>

NAPL present or soil concentration near saturation (for calculating soil vapor concentrations, refer to *Risk-Based Correction Action for Leaking Storage Tank Sites, RG-36*):  yes  no Depth (ft. BGS):

**Vapor monitoring data:**

Sample No.	Location	Depth	% LEL	Total Organic Vapors (ppmv)	Benzene (ppmv)	Other

*If vapor concentrations exceed 25% of the LEL or other potential for explosive vapor exist in surface or subsurface structure, describe affected area, methods of determination, and any abatement measure. Identify and discuss any occupational or indoor air exposures to released contaminants. Provide all calculations for the determination of the target concentrations:*

<sup>1</sup>LEL% should reflect whole mixture evaluation. If more than one compound is present, actual measurement of vapors will typically be warranted.

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**SURFACE WATER ASSESSMENT**

**SURFACE WATER DATA AND EVALUATION**

Surface water(s) affected:  yes  no Name: \_\_\_\_\_ Type: \_\_\_\_\_  
 Name: \_\_\_\_\_ Type: \_\_\_\_\_  
 NAPL present on surface water or run off:  yes  no  
 NAPL recovery method:  passive skimmer  sorbent socks  automated system  booms  other \_\_\_\_\_  none  
 Volumes recovered to date (gals.): \_\_\_\_\_  
 Aerial extent of NAPL plume (ft.<sup>2</sup>): \_\_\_\_\_  
 Uses of affected surface water:  drinking water  contact recreation  habitat for endangered species  agriculture  
 Is a public or domestic surface water intake impacted?  yes  no  
 If impacted lake or pond, indicate affected surface area (ft.<sup>2</sup>): \_\_\_\_\_  
 Average depth of surface water (ft.): \_\_\_\_\_

**Maximum level of contamination detected in surface water (mg/l):**

Contaminant	Sample Date	Sample Location & ID	Laboratory Method Detection Limit	Maximum Concentration (mg/l)	Target Cleanup Goals†
Benzene					
Toluene					
Ethylbenzene					
Total Xylenes					
MTBE					
TPH					
Naphthalene					
Other					
Other					

† Refer to 30 TAC, Chapter 307, the MCL or the *Risk-Based Correction Action for Leaking Storage Tank Sites*, RG-36.

*Describe affected area, methods of determination and any abatement measures. Discuss the migration pathway between the source of contamination and the surface water body.*



**SITE ASSESSMENT**

**Worksheet 11.2**

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PLAN A EVALUATION

**CATEGORY II: Soil and Groundwater Target Cleanup Level Determination**

- Complete this worksheet for Category II sites. Indicate the maximum detected concentration for the chemicals of concern.
- If groundwater is >15 feet BGS, calculate groundwater protective soil concentrations using the equilibrium partition equation on Worksheet 11.5 (when site specific geotechnical parameters have been analyzed). Check the box for each compound that exceeds the target concentrations. If any boxes are checked, further corrective action (i.e., monitoring, Plan B, CAP) will be required.
- If other chemicals of concern are present but not listed, refer to *Risk-Based Corrective Action for Leaking Storage Tank Sites (RG-36)*

Chemical of Concern	GROUNDWATER (mg/l)			SOIL (mg/kg)		
	TARGET CONC.	MAX. LAB. ANALYZED CONC.	Depth to Affected Soil ≤ 15 ft.		Depth to Affected Soil >15 ft.	
			TARGET CONC.	MAX. LAB. ANALYZED CONC.	TARGET CONC.	MAX. LAB. ANALYZED CONC.
BENZENE	<input type="checkbox"/> 0.0294	<0.002	<input type="checkbox"/> 0.74	<0.010	<input type="checkbox"/> 0.74	
ETHYLBENZENE	<input type="checkbox"/> 3.65	<0.002	<input type="checkbox"/> 835	<0.010	<input type="checkbox"/> 835	
TOLUENE	<input type="checkbox"/> 7.3	<0.002	<input type="checkbox"/> 503	<0.010	<input type="checkbox"/> 503	
XYLENE	<input type="checkbox"/> 73	<0.002	<input type="checkbox"/> 968	<0.010	<input type="checkbox"/> 968	
ACENAPHTHENE	<input type="checkbox"/> 2.19		<input type="checkbox"/> 314	<0.500	<input type="checkbox"/> 314	
ANTHRACENE	<input type="checkbox"/> 11		<input type="checkbox"/> 13	<0.500	<input type="checkbox"/> 13	
BENZO(A)ANTHRACENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.500	<input type="checkbox"/> 32	
BENZO(B)FLUORANTHENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.500	<input type="checkbox"/> 129	
BENZO(K)FLUORANTHENE	<input type="checkbox"/> 0.0117		<input type="checkbox"/> 8.77 <sup>H</sup>	<0.500	<input type="checkbox"/> 47	
BENZO(A)PYRENE	<input type="checkbox"/> 0.000117		<input checked="" type="checkbox"/> 0.0877 <sup>H</sup>	<0.200	<input type="checkbox"/> 220	
CHRYSENE	<input type="checkbox"/> 0.117		<input type="checkbox"/> 7.2	<0.500	<input type="checkbox"/> 7.2	
DIBENZO(A,H)ANTHRACENE	<input type="checkbox"/> 0.000117		<input checked="" type="checkbox"/> 0.0877 <sup>H</sup>	<0.200	<input type="checkbox"/> 33	
FLUORANTHENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 156	<0.500	<input type="checkbox"/> 156	
FLUORENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 247	<0.500	<input type="checkbox"/> 247	
INDENO(1,2,3-CD)PYRENE	<input type="checkbox"/> 0.00117		<input type="checkbox"/> 0.877 <sup>H</sup>	<0.500	<input type="checkbox"/> 17	
NAPHTHALENE	<input type="checkbox"/> 1.46		<input type="checkbox"/> 389	<0.500	<input type="checkbox"/> 389	
PYRENE	<input type="checkbox"/> 1.1		<input type="checkbox"/> 99	0.515	<input type="checkbox"/> 99	
OTHER	<input type="checkbox"/>	<0.002	<input type="checkbox"/>	<0.010	<input type="checkbox"/>	
OTHER	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	

H - Value represents health-based concentration

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PLAN A EVALUATION

SOILS ONLY AFFECTED – Regional Groundwater Beneficial Use Cannot be Established

EQUILIBRIUM PARTITION EQUATION

- Use this section to determine the target soil concentrations protective of groundwater ( $C_T$ ). The  $C_T$  value may be calculated for each chemical of concern under the following conditions:
  - the option is provided on the appropriate column of the site specific category worksheet;
  - default target concentration was exceeded;
  - site specific soil parameters have been collected.
- Provide all calculations for each chemical of concern.

PARAMETERS	REFERENCE VALUES USED TO CALCULATE DEFAULT TARGET CONCENTRATION	SITE SPECIFIC VALUES
$C_w$ = Category I groundwater target concentration (chemical specific) (mg/l)	Reference worksheet 11.1 for chemical specific category I target concentration.	
$\rho_s$ = Dry Soil bulk density (g-soil/cm <sup>3</sup> -soil)	1.8	
$\theta_w$ = Water content (cm <sup>3</sup> -H <sub>2</sub> O/cm <sup>3</sup> -soil)	0.1	
$\theta_a$ = Air content (cm <sup>3</sup> -air/cm <sup>3</sup> -soil)	0.22	
$f_{oc}$ = Faction of organic carbon (g-C/g-soil)	0.002	
$K_{oc}$ = Carbon-Water sorption coefficient (chemical specific) (g-H <sub>2</sub> O/g-soil)	Reference RG-36, page 55, Table B-1 for chemical specific values.	
$K_d$ = Soil-Water sorption coefficient = $K_{oc} \times f_{oc}$		
$H'$ = Unitless form of Henry's law constant $H \times 41.57$ (at 25°C)	Reference RG-36 page 55	
$C_l$ = Leachate Concentration Dilution Factor = 100	= Dilution Factor x $C_w$	

Use this equation to determine the target soil concentration which is protective of groundwater for each chemical of concern. Use site specific geotechnical parameters to calculate  $C_T$ . (Use referenced default values for any parameters not analyzed.)

$C_T$  = Target soil concentration protective of groundwater determined by the equilibrium partition equation

$$C_T = \frac{C_l \times (\rho_s K_d + \theta_w + \theta_a H')}{\rho_s}$$

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**SITE PRIORITIZATION**

**PRIORITY 1 SITES**

**NAPL present?**  **yes**  **no** Evaluate all information on site soils, vapors, groundwater, surface water, and other impacts and check all boxes which match site conditions. The lowest value is the site priority. If priority cannot be determined, the assessment is inadequate.

PRIORITY		ACTIONS
<input type="checkbox"/> 1.1	Explosive levels, or concentrations of vapors that could cause acute health effects are present in a residence or other building. (Ensure the local fire authority or State Fire Marshal (512/918-7100) and the local TNRCC Region Office have been notified.)	<b>Emergency Actions:</b> Notify appropriate authorities, property owners, and potentially affected parties. Mitigate vapor impact. <b>Additional Actions:</b> Conduct receptor survey. Conduct assessment of contaminant plumes. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.2	An active public water supply well, public water supply line, or public surface water intake is affected or immediately threatened by the release. (Ensure the public authority and the local TNRCC Region Office have been notified.)	<b>Emergency Actions:</b> Notify appropriate authorities, well users, and property owners. Prevent further migration. Mitigate impact. Discontinue use of water supply. <b>Additional Actions:</b> Provide alternative water source†. Conduct receptor survey. Conduct assessment of contaminant plumes in relation to water supply impact. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.3	A sole-source domestic water supply well or line, or sole-source domestic surface water intake is affected or immediately threatened by the release. (Ensure the well user or surface water user and the local TNRCC Region Office have been notified.)	<b>Emergency Actions:</b> Notify appropriate authorities, well users, and property owners. Prevent further migration. Mitigate impact. Discontinue use of water supply. <b>Additional Actions:</b> Provide alternative water source†. Conduct receptor survey. Conduct assessment of contaminant plumes in relation to water supply impact. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.4	Explosive vapors are present in a subsurface utility system, but no building or residence is affected. (Ensure the utility authority and the local TNRCC Region Office have been notified.)	<b>Emergency Actions:</b> Notify appropriate authorities, property owners, and affected parties. Mitigate vapor impact. <b>Additional Actions:</b> Conduct receptor survey. Conduct assessment of contaminant plumes. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.5	NAPL is present at the ground surface, on surface water bodies, surface water runoff, or in utilities other than water supply lines. (Ensure the utility authority is notified if utilities are affected. Ensure NAPL is removed as required pursuant to 30 TAC 334.79.)	<b>Emergency Actions:</b> Notify appropriate authorities, property owners, and affected parties. Secure area. <b>Additional Actions:</b> Conduct NAPL removal activities. Prevent migration of NAPL. Conduct assessment in relation to impact. Conduct receptor survey. Determine target cleanup levels. Conduct remediation as necessary.
<input type="checkbox"/> 1.6	The Edwards aquifer, recharge zone or transition zone is affected.	<b>Emergency Actions:</b> Recover NAPL if present. <b>Additional Actions:</b> Initiate assessment activities. Conduct assessment in relation to impact. Conduct receptor survey. Determine target cleanup levels. Conduct remediation as necessary. If NAPL is present, conduct removal activities.
<input type="checkbox"/> 1.7	Concentrations of vapors/particulates that could cause acute health affects, or safety concerns are present in outdoor air.	<b>Emergency Actions:</b> Notify appropriate authorities, property owners, and affected parties. Mitigate immediate impacts. <b>Additional Actions:</b> Conduct sufficient assessment to determine exposure pathways, receptors and their locations, and target cleanup goals. If NAPL is present, conduct removal activities.

† Reimbursement is contingent upon 30 TAC 334.308 (c)(3).

LPST ID: 117939

**PRIORITY 2 SITES**

PRIORITY		ACTIONS
<input type="checkbox"/> 2.1	Soils or water contaminated by the release are exposed and unsecured from public access and dwellings, playgrounds, parks, day care centers, schools, or similar use facilities are located within 500 feet of those soils.	Remove, cover, or otherwise secure exposed soils or water. Fill open excavations. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.2	A former vapor impact is associated with this site, or NAPL is present in close proximity to subsurface utilities or other natural or man-made conduit and there is potential for the accumulation of explosive vapors or vapors that could cause acute effects in a building or other structure.	Remediate/remove vapors, NAPL, or contaminated soils. Determine migration pathways and remove/prevent migration pathways. Conduct assessment of contaminant plumes in relation to the potential vapor pathway. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.3	A domestic water supply well or line, or a domestic surface water intake is affected or immediately threatened by the release, but the user has access to another public or private water supply. (Ensure the user and the local TNRCC Region Office have been notified.)	Notify proper authorities, users, and property owners. Prevent migration to water intake. Provide alternative water supply if necessary. Conduct assessment to identify contaminant plumes and exposure pathways in relation to water intake. Determine appropriate target cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.4	A non-public or non-domestic water supply well is affected or immediately threatened. (Do not consider monitor wells.) (Ensure the user and the local TNRCC Region Office have been notified.)	Notify proper authorities, well users, and property owners. Prevent migration to water well. Provide alternative water supply if necessary. Plug water well if necessary. Conduct assessment to identify contaminant plumes and exposure pathways in relation to water well. Determine appropriate target cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.5 <sup>1</sup>	Groundwater is affected and a public or domestic water supply well is located within 0.25 miles of the UST/AST system or source area. (Check if a well is present, but the well use is unknown). (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Evaluate well impact potential. Determine appropriate cleanup goals based on site conditions. Conduct actions necessary to contain contamination or prevent impact or exposure.
<input type="checkbox"/> 2.6	Groundwater or storm water runoff is affected and discharges within 500 feet of the known extent of contamination to a surface water body used for human drinking water, contact recreation, habitat to a protected or listed endangered plant and animal species.	Conduct assessment which addresses the contaminant plumes in relation to the surface water. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure. Notify property owners if impact is documented.
<input type="checkbox"/> 2.7	A public or domestic water supply well that produces from a groundwater zone which is not affected or threatened is located within the known extent of contamination. (Check if a well is present, but the well use is unknown.)	Notify well users and property owners. Determine completion data and usage of water well(s). Conduct receptor survey to locate additional sensitive receptors. Investigate well impact or cross-contamination potential. Plug well(s) if necessary. Determine target cleanup levels. Conduct actions necessary to contain contamination or prevent impact or exposure. Monitor water well for groundwater quality.

LPST ID: 117939

**PRIORITY 3 SITES**

PRIORITY		ACTIONS
<input type="checkbox"/> 3.1 <sup>1</sup>	Groundwater is affected and a public or domestic water supply well is located between 0.25 and 0.5 miles from the UST/AST system or source area. (Check if a well is present in this interval, but the well use is unknown.) (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Evaluate well impact potential. Evaluate need for remediation.
<input type="checkbox"/> 3.2	Groundwater is affected and the affected groundwater zone may discharge between 500 feet and 0.25 miles of the UST/AST or source area to a surface water body used for human drinking water, contact recreation, or habitat to a protected or listed endangered plant and animal species.	Conduct assessment which evaluates potential to impact the surface water. Evaluate need for remediation.
<input type="checkbox"/> 3.3 <sup>1</sup>	Groundwater is affected and a non-public or non-domestic water supply well is located within 0.25 miles of the UST/AST system or source area. (See footnote 1 before responding.)	Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Monitor water well for groundwater quality. Evaluate need for remediation.
<input type="checkbox"/> 3.4	A non-community or non-domestic water supply well that produces from a groundwater zone which is not affected or threatened is located within the known extent of contamination. (If a well is present, but the use of the well is unknown, check 2.7 instead.)	Notify well users and property owners. Determine completion data and usage of well(s) if not already known. Conduct receptor survey to locate additional wells and other potential receptors (if not already done). Investigate well impact or cross-contamination potential. Monitor water well for groundwater quality. Evaluate need for remediation.
<input type="checkbox"/> 3.5 <sup>2</sup>	A designated major or minor groundwater aquifer is affected or immediately threatened. (See footnote 2 before responding.)	Conduct assessment of soil and groundwater contaminant plumes in relation to major or minor aquifer. Conduct receptor survey and water well inventory. Evaluate need for remediation.

**PRIORITY 4 SITES**

PRIORITY		ACTIONS
<input type="checkbox"/> 4.1	Groundwater is affected.	Conduct assessment of soil and groundwater contaminant plumes. Conduct receptor survey and water well inventory. Evaluate site conditions to determine need for additional corrective actions.
<input checked="" type="checkbox"/> 4.2	The vertical extent of contamination has been defined and the assessment results document that groundwater is not affected.	Conduct assessment of soil contaminant plume. Conduct receptor survey and water well inventory. Evaluate site conditions to determine need for additional corrective actions.

1. Consider only wells producing from the same interval as the affected groundwater zone at the release site, wells which may provide a cross-contamination pathway, or wells where completion details are unknown.
2. Refer to Major and Minor Aquifers of Texas Maps prepared by Texas Water Development Board, September 1990. Do not consider the low permeability Beaumont clays of the Beaumont Formation for the Gulf Coast aquifer. Do not consider a perched groundwater zone overlaying the principal producing portion of the aquifer unless the two are hydrologically connected.

Abbreviations	Definition
%	percent
AST	Above-ground Storage Tank
AV	aviation
BGS	below ground surface
C	Celsius
CAP	corrective action plan
CAT.	category
CH <sub>4</sub>	methane
cm <sup>3</sup>	cubic centimeter
cm <sup>2</sup> /cm <sup>2</sup>	square centimeter per square centimeter
CO <sub>2</sub>	carbon dioxide
coml.	commercial
conc.	concentration
cont.	continue
EPA	Environmental Protection Agency
Fe	iron
ft.	feet
ft. <sup>2</sup>	square feet
gal.	gallons
g/g	gram per gram
g/m <sup>3</sup>	gram per cubic meter
gpd	gallons per day
ID	identification
in.	inches
Lab.	laboratory
LPST	Leaking Petroleum Storage Tank
LSA	Limited Site Assessment
Max.	maximum
MCL	maximum contaminant level
mg/kg	milligram per kilogram
mg/l	milligram per liter
NAPL	non-aqueous phase liquid
No.	number
O <sub>2</sub>	oxygen
ppm	parts per million
PST	Petroleum Storage Tank
RP	Responsible Party
RPR	Responsible Party Remediation
TAC	Texas Administrative Code
TEX	toluene, ethylbenzene, and total xylenes
TCEQ	Texas Commission on Environmental Quality
TPH	total petroleum hydrocarbons
UST	Underground Storage Tank

Fannett Road

Site map

Dolores Street

Stockpile

MW-1

MW-3

Pump Island

MW-2

SB-1

former gasoline UST site

former diesel UST site

Stockpile

Tank 4

SB-2

Tank 1  
Tank 2  
Tank 3

trees & grass

Legend

- Fenceline
- - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊕ Monitor Well location
- ⊕ Boring location
- Soil Sample Location (UST removal)

Apartment Bldg.

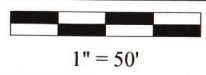
Apartment Bldg.



concrete

APOLLO® Environmental Strategies, Inc

Drawn by: MG / 7-14-09  
Revised by:



Site Plan - Former service station  
Corner of Fannett Rd. & Dolores St.  
Beaumont, TX 77705



Residential

Residential/Commercial

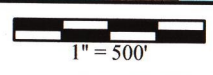
Vicinity

Site

500' radius

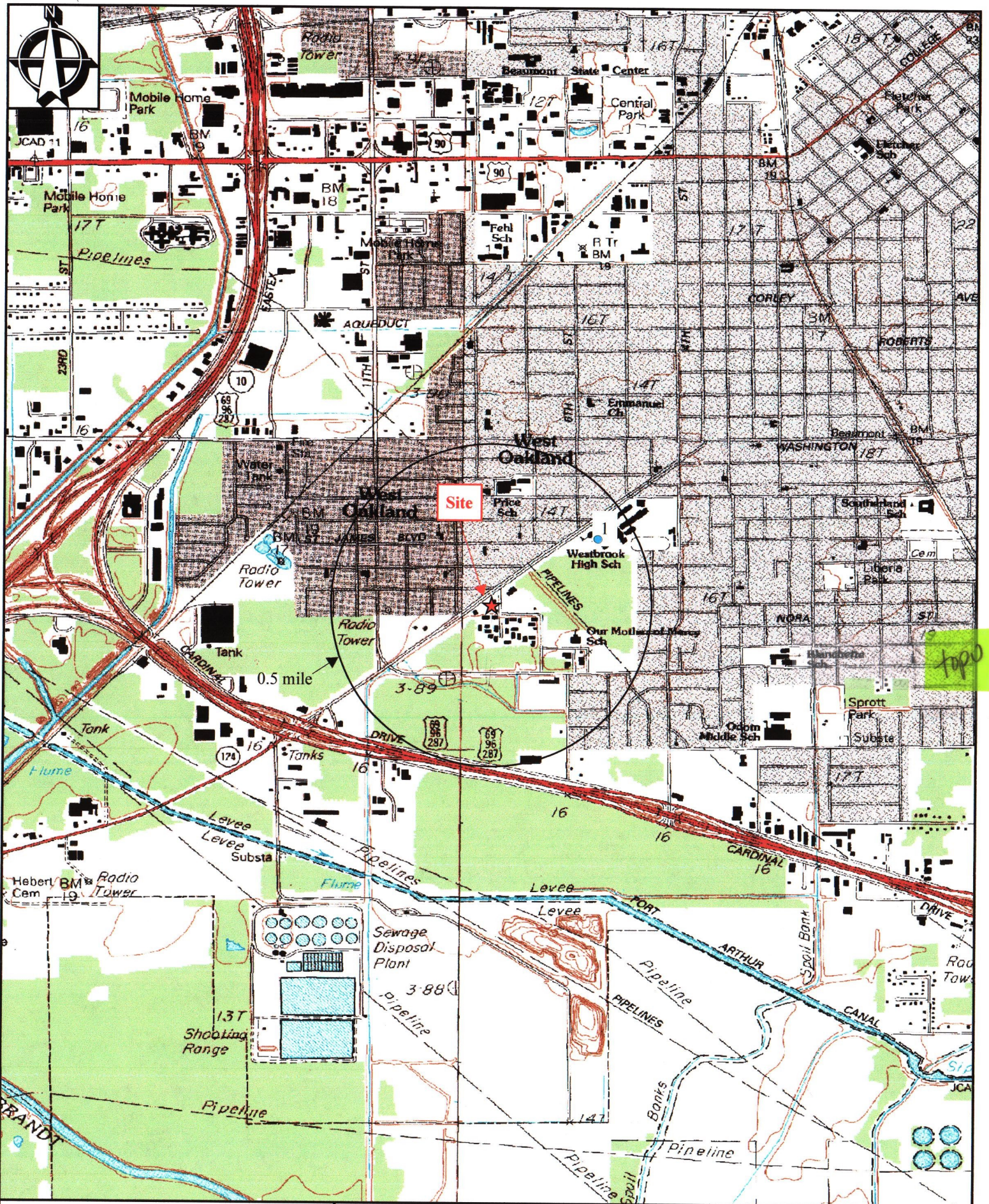
- 1 - Starcrest Apartments
- 2 - Eva's Place (Restaurant)
- 3 - Cathedral of Faith Baptist Church
- 4 - Residences
- 5 - Clifton J. Ozen High School
- 6 - Gerard's Barbecue Diner

Drawn by: MG / 7-13-09  
 Revised by:



Vicinity Map - Former service station  
 Corner of Fannett Rd. and Dolores St.  
 Beaumont, TX 77705



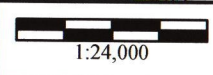


7120

APOLLO® Environmental Strategies, Inc.

Drawn by: MG / 7-13-09

Revised by:



Topographic Map - Former service station  
 Corner of Fannett Rd. and Dolores St.  
 Beaumont, TX 77705

Send original copy by certified mail to the Texas Department of Water Resources, P. O. Box 13087, Austin, Texas 78711

State of Texas  
**WATER WELL REPORT**

For TDWR use only  
Well No. 61-64-4D  
Located on map Yes  
Received: RWB

ATTENTION OWNER: Confidentiality Privilege Notice on Reverse Side

1) OWNER: GULFSTREAM PETRO (Name) Address: 350 N. BELT ST. 101 (Street or RFD) HO TEX (City) 77060 (State) (Zip)

2) LOCATION OF WELL: County: JEFFERSON miles in \_\_\_\_\_ direction from SOUTH BIRMINGHAM VIRGINIA STREET (N.E., S.W., etc.)

Driller must complete the legal description to the right with distance and direction from two intersecting section or survey lines, or he must locate and identify the well on an official Quarter- or Half-Section Texas County General Highway Map and attach the map to this form.

Legal description: Section No. \_\_\_\_\_ Stock No. \_\_\_\_\_ Township \_\_\_\_\_  
Abstract No. \_\_\_\_\_ Survey Name \_\_\_\_\_  
Distance and direction from two intersecting section or survey lines \_\_\_\_\_

4) See attached map.

3) TYPE OF WORK (Check):  
 New Well  Deepening  Reconditioning  Plugging

4) PROPOSED USE (Check):  
 Domestic  Industrial  Public Supply  Irrigation  Test Well  Other

5) DRILLING METHOD (Check):  
 Mud Rotary  Air Hammer  Driven  Bored  Air Rotary  Cable Tool  Jetted  Other

6) WELL LOG:  
 Date drilled: 1-12-80

DIAMETER OF HOLE		Description and color of formation material
From (ft.)	To (ft.)	
0	6.5	Clay
6.5	8.5	Sand (Coarse)

7) BOREHOLE COMPLETION:  
 Open Hole  Staircase Well  Underreamed  
 Gravel Packed  Other \_\_\_\_\_  
 If Gravel Packed give interval ... from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

8) CASING, BLANK PIPE, AND WELL SCREEN DATA:

From (ft.)	To (ft.)	Dia. (in.)	Now or Used	Steel, Plastic, etc. Perf., Slotted, etc. Screen Mfg. (if commercial)	Setting (ft.)		Gauge Casing Screen
					From	To	
		4"		New Plastic	0	6.5	5/8"
		4"		New Plastic Ribbed	6.5	8.5	0.18

CEMENTING DATA  
 Cemented from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 Method used \_\_\_\_\_  
 Cemented by \_\_\_\_\_ (Company or Individual)

9) WATER LEVEL:  
 Static level 12 ft. below land surface Date 1-12-82  
 Artesian flow \_\_\_\_\_ gpm. Date \_\_\_\_\_

10) PACKERS: Type \_\_\_\_\_ Depth \_\_\_\_\_

11) TYPE PUMP:  
 Turbine  Jet  Submersible  Cylinder  
 Other Jetted  
 Depth to pump bowls, cylinder, jet, etc., 80 ft.

12) WELL TESTS:  
 Type Test  Pump  Boiler  Jetted  Estimated  
 Yield: 20 gpm with \_\_\_\_\_ ft. drawdown after \_\_\_\_\_ hrs.

13) WATER QUALITY:  
 Did you knowingly penetrate any strata which contained undesirable water?  Yes  No  
 If yes, submit "REPORT OF UNDESIRABLE WATER"  
 Type of water? \_\_\_\_\_ Depth of strata \_\_\_\_\_  
 Was a chemical analysis made?  Yes  No

I hereby certify that this well was drilled by me (or under my supervision) and that each and all of the statements herein are true to the best of my knowledge and belief.

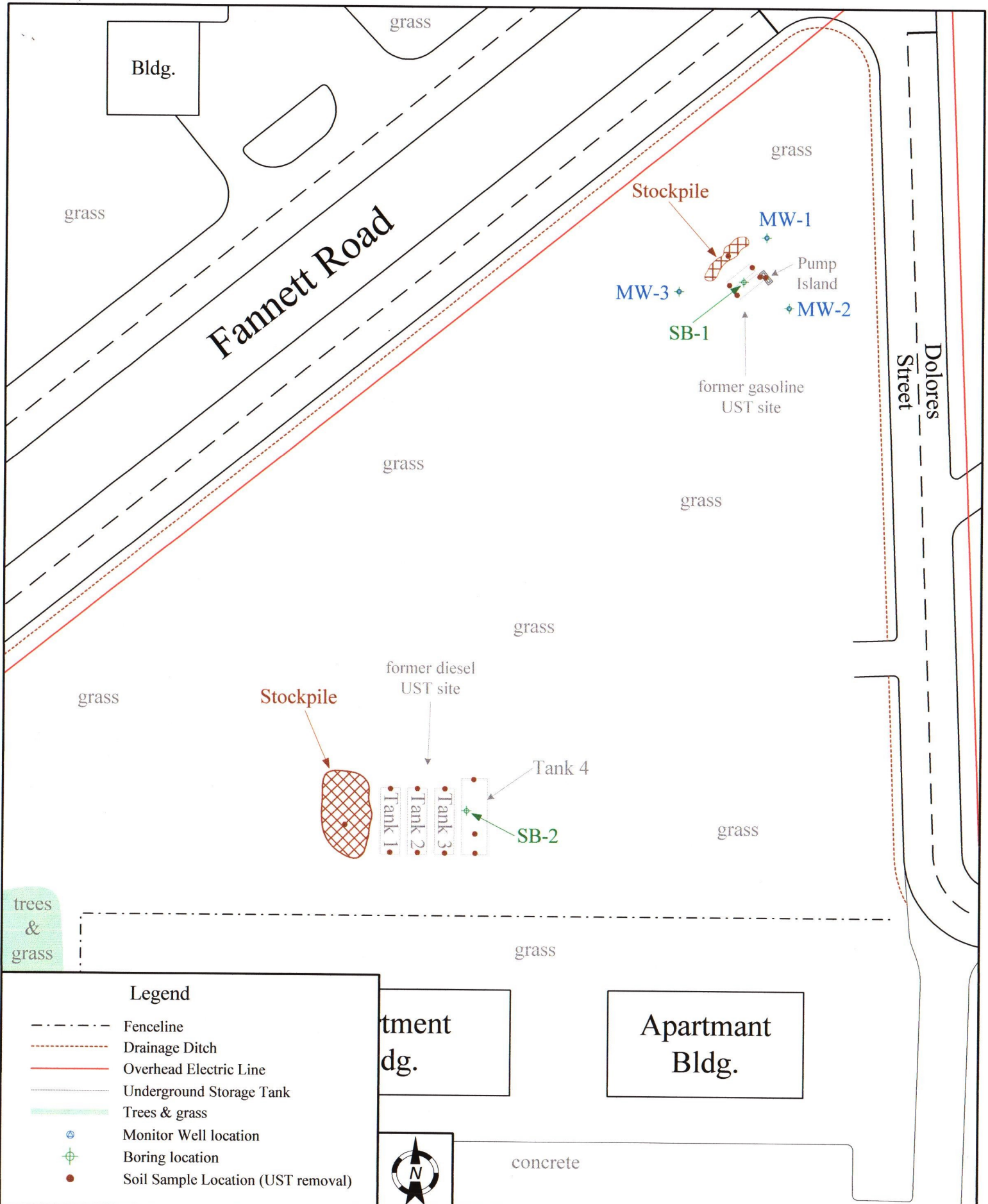
NAME: JOHN E. BRYSON (Type or Print) Water Well Drillers Registration No. 1315

ADDRESS: P.O. Box 213 (Street or RFD) WINNIE TEXAS (City) 77665 (State) (Zip)

(Signed) John Bryson (Water Well Driller) B&L WATER WELL SERVICE (Company Name)

Please attach electric log, chemical analysis, and other pertinent information, if available.

Water well



**Legend**

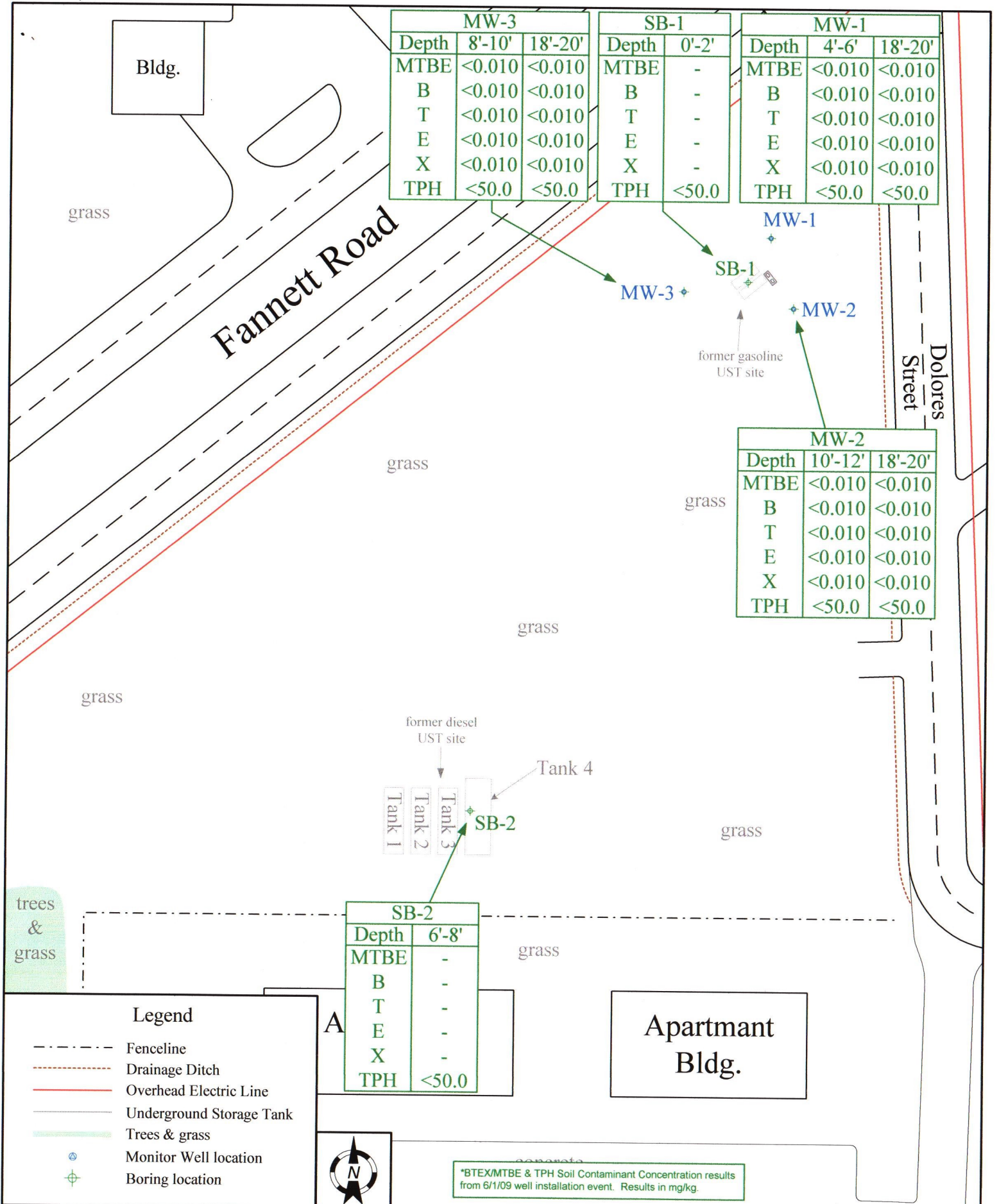
- Fenceline
- - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊕ Monitor Well location
- ⊕ Boring location
- Soil Sample Location (UST removal)

ment  
dg.

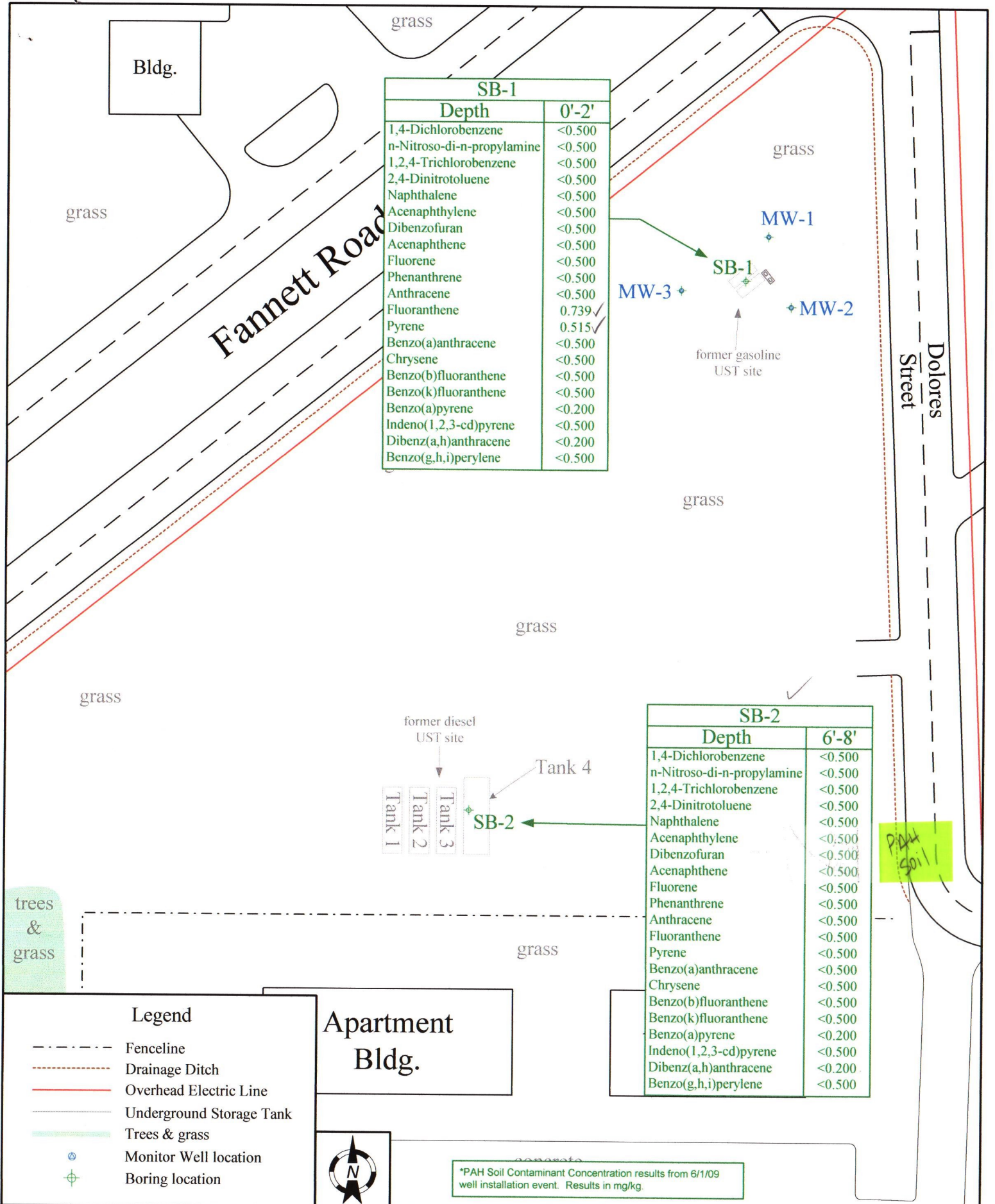
Apartment  
Bldg.



concrete



\*BTEX/MTBE & TPH Soil Contaminant Concentration results from 6/1/09 well installation event. Results in mg/kg.



SB-1	
Depth	0'-2'
1,4-Dichlorobenzene	<0.500
n-Nitroso-di-n-propylamine	<0.500
1,2,4-Trichlorobenzene	<0.500
2,4-Dinitrotoluene	<0.500
Naphthalene	<0.500
Acenaphthylene	<0.500
Dibenzofuran	<0.500
Acenaphthene	<0.500
Fluorene	<0.500
Phenanthrene	<0.500
Anthracene	<0.500
Fluoranthene	0.739 ✓
Pyrene	0.515 ✓
Benzo(a)anthracene	<0.500
Chrysene	<0.500
Benzo(b)fluoranthene	<0.500
Benzo(k)fluoranthene	<0.500
Benzo(a)pyrene	<0.200
Indeno(1,2,3-cd)pyrene	<0.500
Dibenz(a,h)anthracene	<0.200
Benzo(g,h,i)perylene	<0.500

SB-2	
Depth	6'-8'
1,4-Dichlorobenzene	<0.500
n-Nitroso-di-n-propylamine	<0.500
1,2,4-Trichlorobenzene	<0.500
2,4-Dinitrotoluene	<0.500
Naphthalene	<0.500
Acenaphthylene	<0.500
Dibenzofuran	<0.500
Acenaphthene	<0.500
Fluorene	<0.500
Phenanthrene	<0.500
Anthracene	<0.500
Fluoranthene	<0.500
Pyrene	<0.500
Benzo(a)anthracene	<0.500
Chrysene	<0.500
Benzo(b)fluoranthene	<0.500
Benzo(k)fluoranthene	<0.500
Benzo(a)pyrene	<0.200
Indeno(1,2,3-cd)pyrene	<0.500
Dibenz(a,h)anthracene	<0.200
Benzo(g,h,i)perylene	<0.500

PAH Soil

\*PAH Soil Contaminant Concentration results from 6/1/09 well installation event. Results in mg/kg.

**Legend**

- Fenceline
- - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊕ Monitor Well location
- ⊕ Boring location

Apartment Bldg.



1" = 50'

APOLLO® Environmental Strategies, Inc

Drawn by: MG / 7-14-09  
Revised by:

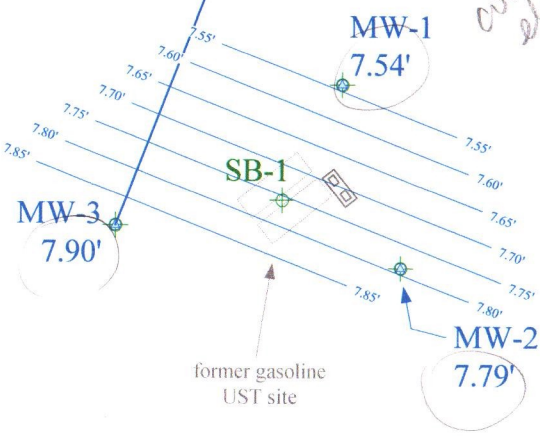
Soil Contaminant Map - Former service station  
Corner of Fannett Rd. & Dolores St.  
Beaumont, TX 77705

Fannett Road

Dolores Street

Groundwater Gradient  
0.0107 ft./ft.

*all corrected elevations*



former gasoline UST site

former diesel UST site (off map)

**Legend**

- Fenceline
- - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊙ Monitor Well location
- ⊕ Boring location

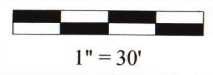


\*Groundwater levels measured 6/23/09

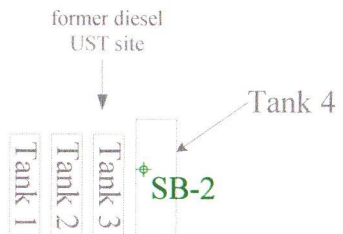
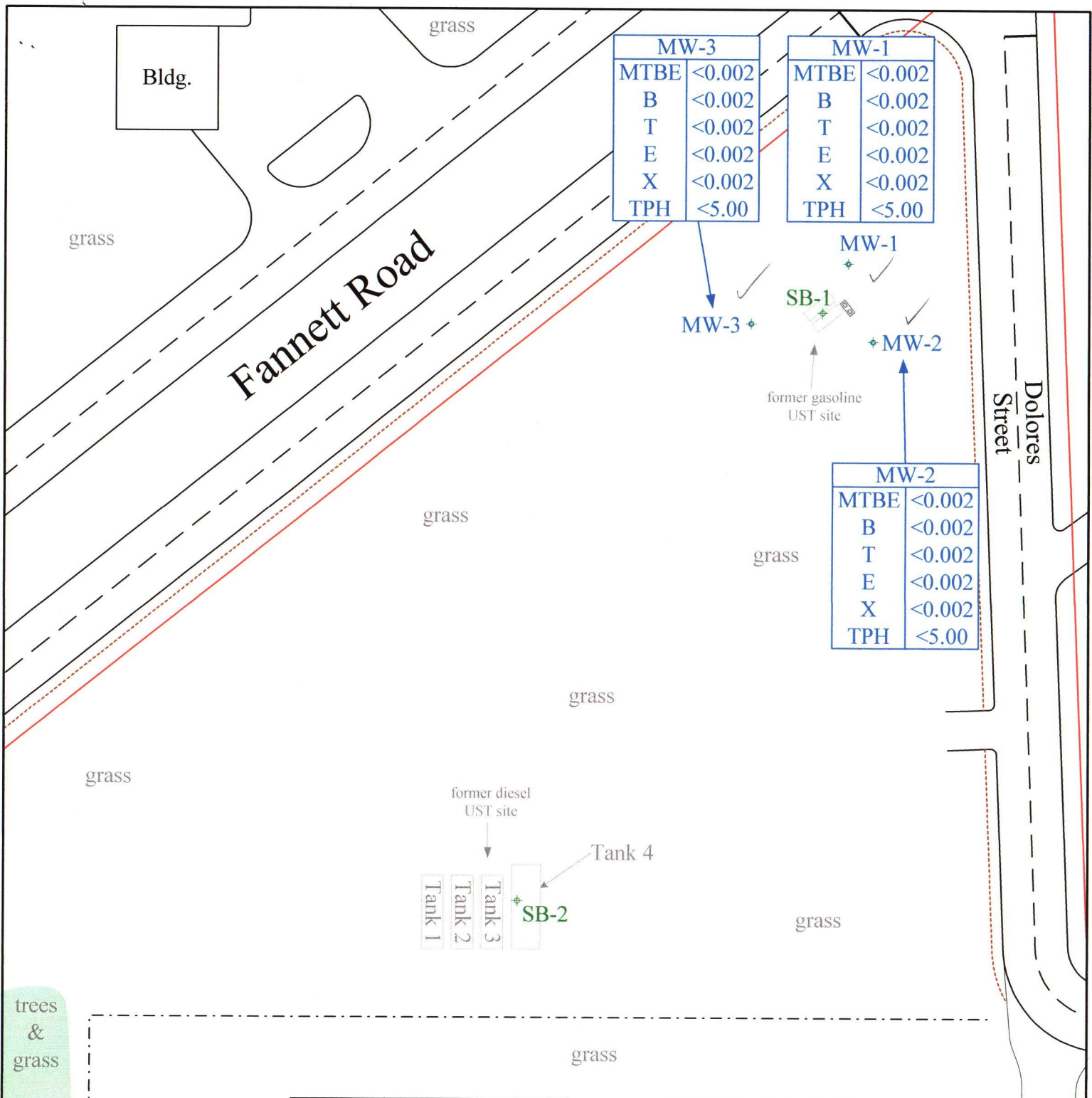


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Drawn by: MG / 7-17-09  
Revised by:



GW Gradient Map - Former service station  
Corner of Fannett Rd. & Dolores St.  
Beaumont, TX 77705



**Legend**

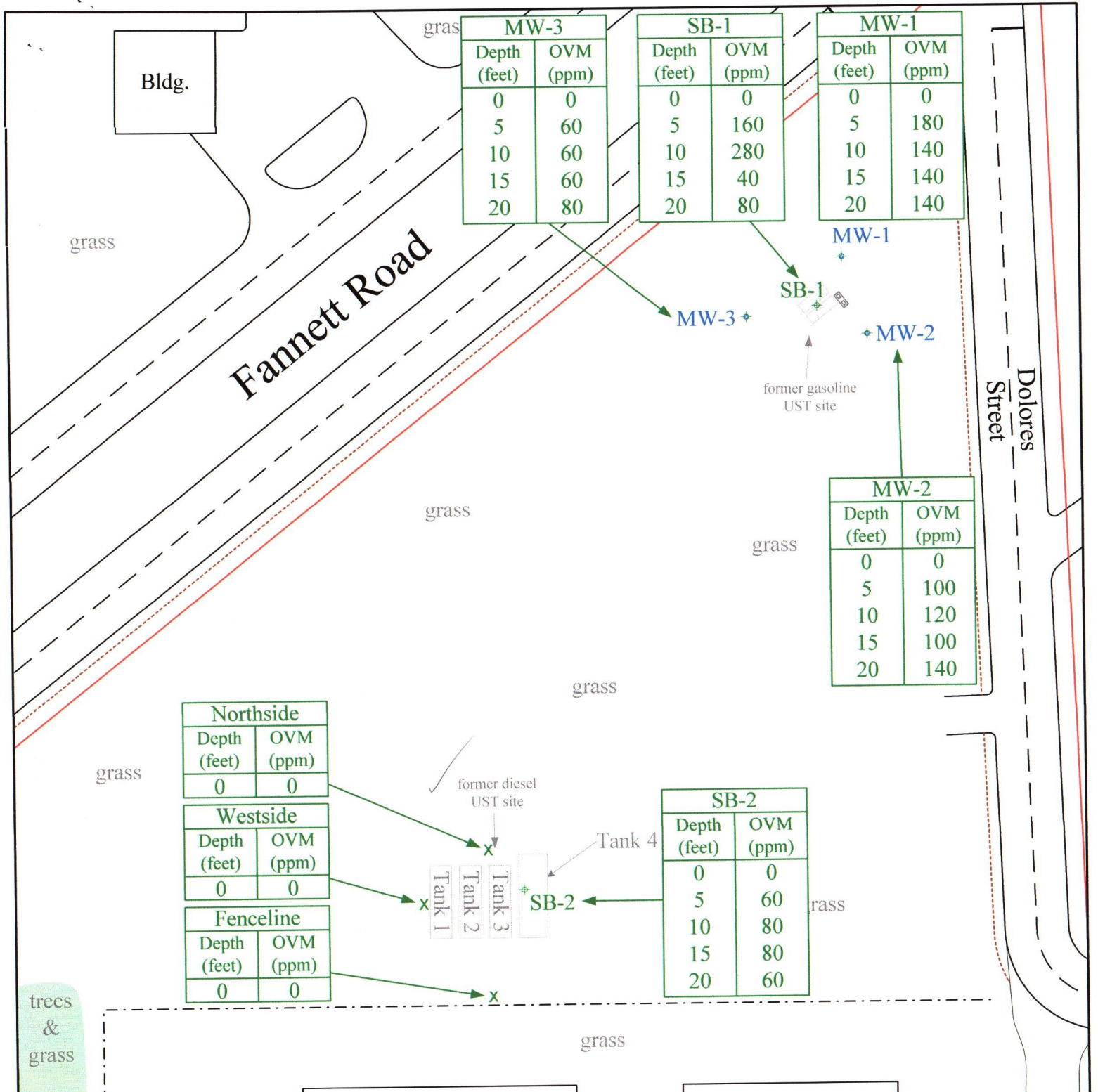
- - - - Fenceline
- - - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊕ Monitor Well location
- ⊕ Boring location

Apartment Bldg.

Apartment Bldg.



\*Groundwater Contaminant Concentration results from 6/1/09 well installation event. Results in mg/L.



**Legend**

- Fenceline
- - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- Trees & grass
- ⊕ Monitor Well location
- ⊕ Boring location

**Apartment Bldg.**

**Apartment Bldg.**



\*Vapor Contaminant Concentration results from 6/1/09 well installation event. Results in ppm.



P.O. Box 12114  
 Beaumont, TX 77726  
 1-800-742-1033






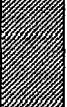
**Log of Borehole: SB-1**

**Project Manager/Driller: Thomas A. (Andy) Elms**  
**TX Driller License Number: 51497M**

**Project:** Additional Assessment

**Client:** Cathedral of Faith

**Site Location:** Fannett Rd. & Dolores St., Beaumont, TX

SUBSURFACE PROFILE					SAMPLE			Well Completion Details
Depth	USCS Code	Symbol	Description	Depth/Elev.	Number	Recovery %	OVM (ppm)	
0			Ground Surface	0.0				A well was not installed.
1	CH		<b>CLAY</b> Dark brown to black clay with organic material; very moist; soft; high plasticity; no odor.	2.0	*0' - 2'	100	520	
2								
3	CH		<b>CLAY</b> Brown and orange mottled clay with organic material; very moist; soft; high plasticity; no odor.	4.0	2' - 4'	100	460	
4								
5								
6								
7	CL		<b>SILTY CLAY</b> Grey and orange mottled silty clay; moist; soft; high plasticity; no odor.	9.5	4' - 6'	50	160	
8								
9								
10	CL		<b>SILTY CLAY</b> Grey and orange mottled silty clay; wet; soft; high plasticity; no odor.	10.5	6' - 8'	50	100	
11								
12	CL		<b>CLAY</b> Grey clay with some orange mottling; very moist; soft; low plasticity; slight odor.	14.0	8' - 10'	80	220	
13								
14								
15								
16								
17								
18								
19	SC		<b>SAND</b> Dark brown sand; wet; soft; fine grained.	24.0	10' - 12'	100	280	
20								
21								
22								
23								
24			End of Log					
25								*Sampled interval.

**Drilled By:** Thomas A. Elms  
**Driller License Number:** 51497M  
**Drill Method:** Flight Auger  
**Sampling Method:** Split Spoon

**Drill Date:** 6/1/2009  
**Borehole Size:** 3"  
**Casing Diameter:** N/A  
**Datum:** 30° 2' 55" N, 94° 7' 25" W

P.O. Box 12114  
 Beaumont, TX 77726  
 1-800-742-1033








**Log of Borehole: SB-2**

**Project Manager/Driller: Thomas A. (Andy) Elms**  
**TX Driller License Number: 51497M**

**Project:** Additional Assessment

**Client:** Cathedral of Faith

**Site Location:** Fannett Rd. & Dolores St., Beaumont, TX

SUBSURFACE PROFILE					SAMPLE			Well Completion Details
Depth	USCS Code	Symbol	Description	Depth/Elev.	Number	Recovery %	OVM (ppm)	
0			Ground Surface	0.0				A well was not installed. 0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
1	CL		<b>CLAY</b> Dark brown to black clay with organic material; moist; stiff; medium plasticity; no odor.	2.0	0' - 2'	100	60	
2								
3					2' - 4'	100	40	
4	CL		<b>CLAY</b> Grey and orange mottled clay with organic material; moist; stiff; medium plasticity; no odor.					
5					4' - 6'	90	60	
6				6.0				
7					*6' - 8'	80	100	
8	CL		<b>CLAY</b> Grey and orange mottled clay with organic material and some black speckles; moist; stiff; medium plasticity; no odor.					
9					8' - 10'	80	80	
10				10.0				
11					10' - 12'	100	80	
12	CL		<b>SILTY CLAY</b> Grey and orange mottled silty clay with organic material and some black speckles; moist; soft; low plasticity; no odor.					
13					12' - 14'	100	80	
14				14.5				
15					14' - 16'	95	80	
16	ML		<b>SILT</b> Grey silt; moist; soft; friable; slight odor.					
17					16' - 18'	90	60	
18								
19				19.0				
20	ML		<b>SILT</b> Orange brown silt; very moist; soft; friable; slight odor.	20.0	18' - 20'	90	60	
21								
22					20' - 22'	60		
23	ML		<b>SILT</b> Orange brown silt; wet; soft; slight odor.					
24					22' - 24'	60		
25			End of Log	24.0				

\*Sampled interval.

**Drilled By:** Thomas A. Elms  
**Driller License Number:** 51497M  
**Drill Method:** Flight Auger  
**Sampling Method:** Split Spoon

**Drill Date:** 6/1/2009  
**Borehole Size:** 3"  
**Casing Diameter:** N/A  
**Datum:** 30° 2' 53" N, 94° 7' 26" W

P.O. Box 12114  
 Beaumont, TX 77726  
 1-800-742-1033

**Log of Borehole: MW-1**

**Project Manager/Driller: Thomas A. (Andy) Elms**  
**TX Driller License Number: 51497M**

**Project:** Additional Assessment

**Client:** Cathedral of Faith

**Site Location:** Fannett Rd. & Dolores St., Beaumont, TX

**SUBSURFACE PROFILE**

**SAMPLE**

Depth	USCS Code	Symbol	Description	Depth/Elev.	Number	Recovery %	OVM (ppm)	Well Completion Details
0			Ground Surface	0.0				<p><i>malfunctioning?</i></p>
1	CL	[Hatched Pattern]	<b>SILTY CLAY</b> Dark brown silty clay; moist; soft; low plasticity; no odor.	6.0	0' - 2'	60	140	
2					2' - 4'	60	140	
3					*4' - 6'	70	180	
4	CL	[Hatched Pattern]	<b>SILTY CLAY</b> Grey, black and orange mottled silty clay; moist; semi stiff; low plasticity; no odor.	10.0	6' - 8'	80	160	
5					8' - 10'	80	160	
6					10' - 12'	100	140	
7	CL	[Hatched Pattern]	<b>SILTY CLAY</b> Grey and orange mottled silty clay; moist to dry; soft; low plasticity; no odor.	16.0	12' - 14'	100	120	
8					14' - 16'	90	140	
9					16' - 18'	80	100	
10	CL	[Hatched Pattern]	<b>SILTY CLAY</b> Grey and orange mottled silty clay; very moist; soft; low plasticity; no odor.	20.0	*18' - 20'	80	140	
11					20' - 22'	50		
12					22' - 24'	50		
13			End of Log	24.0				

\*Sampled interval.

**Drilled By:** Thomas A. Elms  
**Driller License Number:** 51497M  
**Drill Method:** Flight Auger  
**Sampling Method:** Split Spoon

**Drill Date:** 6/1/2009  
**Borehole Size:** 6"  
**Casing Diameter:** 2"  
**Datum:** 30° 2' 55" N, 94° 7' 25" W

P.O. Box 12114  
 Beaumont, TX 77726  
 1-800-742-1033

**Log of Borehole: MW-2**

**Project Manager/Driller: Thomas A. (Andy) Elms**  
**TX Driller License Number: 51497M**

**Project:** Additional Assessment

**Client:** Cathedral of Faith

**Site Location:** Fannett Rd. & Dolores St., Beaumont, TX

SUBSURFACE PROFILE					SAMPLE			Well Completion Details
Depth	USCS Code	Symbol	Description	Depth/Elev.	Number	Recovery %	OVM (ppm)	
0			Ground Surface	0.0				
1	CL		<b>SILTY CLAY</b> Dark brown to black silty clay with organic material; moist; soft; low plasticity; no odor.		0' - 2'	50	100	
2					2' - 4'	50	60	
3					4' - 6'	55	100	
4	CL		<b>SILTY CLAY</b> Grey and orange mottled silty clay; moist; soft; medium plasticity; no odor.	5.5	6' - 8'	60	100	
5					8' - 10'	60	100	
6					*10' - 12'	100	120	
7					12' - 14'	100	80	
8					14' - 16'	85	100	
9	ML		<b>SILT</b> Grey silt; moist; soft; no odor.	14.5	16' - 18'	70	120	
10					*18' - 20'	70	140	
11	CH		<b>CLAY</b> Grey and brown mottled clay; wet; soft; high plasticity; no odor.	20.0	20' - 22'	60		
12					22' - 24'	60		
13					End of Log			

\*Sampled interval.

**Drilled By:** Thomas A. Elms  
**Driller License Number:** 51497M  
**Drill Method:** Flight Auger  
**Sampling Method:** Split Spoon

**Drill Date:** 6/1/2009  
**Borehole Size:** 6"  
**Casing Diameter:** 2"  
**Datum:** 30° 2' 55" N, 94° 7' 25" W



### STATE OF TEXAS PLUGGING REPORT for Tracking #55804

Owner:	Cathedral of Faith Baptist	Owner Well #:	various
Address:	3755 Fannett Rd. Beaumont, TX 77705	Grid #:	61-64-4
Well Location:	Fannett Rd. & Dolores St. Beaumont, TX 77705	Latitude:	30° 02' 54" N
Well County:	Jefferson	Longitude:	094° 07' 25" W
		GPS Brand Used:	No Data

Well Type: **Monitor**

#### HISTORICAL DATA ON WELL TO BE PLUGGED

Original Well Driller: **Thomas A. Elms**

Driller's License Number  
of Original Well Driller: **51497**

Date Well Drilled: **6/1/2009**

Well Report Tracking  
Number: **No Data**

Diameter of Well: **3 inches**

Total Depth of Well: **24 feet**

Date Well Plugged: **6/1/2009**

Person Actually  
Performing Plugging  
Operation: **Thomas A. Elms**

License Number of  
Plugging Operator: **51497**

Plugging Method: **Pour in 3/8 bentonite chips when standing water in well is less than 100 feet in depth, cement top 2 feet.**

Plugging Variance #: **No Data**

Casing Left Data: **1st Interval: No Data  
2nd Interval: No Data  
3rd Interval: No Data**

Cement/Bentonite Plugs  
Placed in Well: **1st Interval: From 0 ft to 24 ft; Sack(s)/type of cement used: 2 bentonite  
2nd Interval: No Data  
3rd Interval: No Data  
4th Interval: No Data  
5th Interval: No Data**

Certification Data: **The plug installer certified that the plug installer plugged this well (or the well was plugged under the plug installer's direct supervision) and that each and all of the statements herein are true and correct. The plug installer understood that failure to complete the required items will result in the log(s) being returned for completion and resubmittal.**

Company Information: **APOLLO Environmental Strategies, Inc.  
P. O. Box 12114**

**Beaumont , TX 77726**

Plug Installer License  
Number:

**51497**

Licensed Plug Installer  
Signature:

**Thomas A. Elms**

Registered Plug Installer  
Apprentice Signature:

**No Data**

Apprentice Registration  
Number:

**No Data**

Plugging Method  
Comments:

**A total of 2 borings were advanced to depths of up to 24' for the purpose of collecting soil samples. No risers or screens were installed. Each borehole was filled from bottom to top with bentonite. No cement was placed in top two feet due to its potential hazard to land use.**

---

Please include the plugging report's tracking number (Tracking #55804) on your written request.

**Texas Department of Licensing & Regulation  
P.O. Box 12157  
Austin, TX 78711  
(512) 463-7880**

### STATE OF TEXAS WELL REPORT for Tracking #182458

Owner: <b>Cathedral of Faith Baptist Church</b>	Owner Well #: <b>MW-1</b>
Address: <b>3755 Fannett Rd. Beaumont , TX 77705</b>	Grid #: <b>61-64-4</b>
Well Location: <b>Fannett Rd. &amp; Dolores St. Beaumont , TX 77705</b>	Latitude: <b>30° 02' 55" N</b>
Well County: <b>Jefferson</b>	Longitude: <b>094° 07' 25" W</b>
Elevation: <b>No Data</b>	GPS Brand Used: <b>No Data</b>
<hr/>	
Type of Work: <b>New Well</b>	Proposed Use: <b>Monitor</b>

Drilling Date:       Started: **6/1/2009**  
                          Completed: **6/1/2009**

Diameter of Hole:   Diameter: **6 in From Surface To 24 ft**

Drilling Method:    Other: **Flight Auger**

Borehole            Gravel Packed From: **2 ft to 24 ft**  
Completion:         Gravel Pack Size: **16/30**

Annular Seal Data:  1st Interval: **From 0 ft to 1 ft with 1 concrete (#sacks and material)**  
                          2nd Interval: **From 1 ft to 2 ft with 1 bentonite (#sacks and material)**  
                          3rd Interval: **No Data**  
                          Method Used: **surface pour**  
                          Cemented By: **Thomas A. Elms**  
                          Distance to Septic Field or other Concentrated Contamination: **No Data**  
                          Distance to Property Line: **No Data**  
                          Method of Verification: **No Data**  
                          Approved by Variance: **No Data**

Surface             **Surface Slab Installed**  
Completion:

Water Level:        Static level: **No Data**  
                          Artesian flow: **No Data**

Packers:           **No Data**

Plugging Info:     Casing or Cement/Bentonite left in well: **No Data**

Type Of Pump:     **No Data**

Well Tests:        **No Data**

Water Quality:     Type of Water: **No Data**  
                          Depth of Strata: **No Data**  
                          Chemical Analysis Made: **No Data**  
                          Did the driller knowingly penetrate any strata which contained undesirable constituents: **No Data**

Certification Data: The driller certified that the driller drilled this well (or the well was drilled under the driller's direct supervision) and that each and all of the statements herein are true and correct. The driller understood that failure to complete the required items will result in the log(s) being returned for completion and resubmittal.

Company            **APOLLO Environmental Strategies, Inc.**  
Information:        **P. O. Box 12114**



**Beaumont , TX 77726**

Driller License Number: **51497**

Licensed Well Driller Signature: **Thomas A. Elms**

Registered Driller Apprentice Signature: **No Data**

Apprentice Registration Number: **No Data**

Comments: **No Data**

**IMPORTANT NOTICE FOR PERSONS HAVING WELLS DRILLED CONCERNING CONFIDENTIALITY**

TEX. OCC. CODE Title 12, Chapter 1901.251, authorizes the owner (owner or the person for whom the well was drilled) to keep information in Well Reports confidential. The Department shall hold the contents of the well log confidential and not a matter of public record if it receives, by certified mail, a written request to do so from the owner.

Please include the report's Tracking number (Tracking #182458) on your written request.

Texas Department of Licensing & Regulation  
 P.O. Box 12157  
 Austin, TX 78711  
 (512) 463-7880

**DESC. & COLOR OF FORMATION MATERIAL**

**CASING, BLANK PIPE & WELL SCREEN DATA**

From (ft) To (ft) Description	Dia. New/Used Type	Setting From/To
0-6 Dark brown silty clay; moist; soft; low plasticity.	2 New PVC Riser	0/4 Riser
6-10 Grey, black and orange mottled silty clay; moist; semi stiff; low plasticity.	2 New PVC Screen	4/24 0.010
10-16 Grey and orange mottled silty clay; moist to dry; soft; low plasticity.		
16-20 Grey and orange mottled silty clay; very moist; soft; low plasticity.		
20-24 Brownish silty clay; wet; soft.		

### STATE OF TEXAS WELL REPORT for Tracking #182461

Owner:	Cathedral of Faith Baptist Church	Owner Well #:	MW-2
Address:	3755 Fannett Rd. Beaumont , TX 77705	Grid #:	61-64-4
Well Location:	Fannett Rd. & Dolores St. Beaumont , TX 77705	Latitude:	30° 02' 55" N
Well County:	Jefferson	Longitude:	094° 07' 25" W
Elevation:	No Data	GPS Brand Used:	No Data
<hr/>			
Type of Work:	New Well	Proposed Use:	Monitor

Drilling Date:       Started: **6/1/2009**  
                           Completed: **6/1/2009**

Diameter of Hole:   Diameter: **6 in From Surface To 24 ft**

Drilling Method:    Other: **Flight Auger**

Borehole  
Completion:       Gravel Packed From: **2 ft to 24 ft**  
                           Gravel Pack Size: **16/30**

Annular Seal Data:  1st Interval: **From 0 ft to 1 ft with 1 concrete (#sacks and material)**  
                           2nd Interval: **From 1 ft to 2 ft with 1 bentonite (#sacks and material)**  
                           3rd Interval: **No Data**  
                           Method Used: **surface pour**  
                           Cemented By: **Thomas A. Elms**  
                           Distance to Septic Field or other Concentrated Contamination: **No Data**  
                           Distance to Property Line: **No Data**  
                           Method of Verification: **No Data**  
                           Approved by Variance: **No Data**

Surface  
Completion:       **Surface Slab Installed**

---

Water Level:       Static level: **No Data**  
                           Artesian flow: **No Data**

Packers:           **No Data**

Plugging Info:     Casing or Cement/Bentonite left in well: **No Data**

Type Of Pump:     **No Data**

Well Tests:        **No Data**

---

Water Quality:     Type of Water: **No Data**  
                           Depth of Strata: **No Data**  
                           Chemical Analysis Made: **No Data**  
                           Did the driller knowingly penetrate any strata which contained undesirable constituents: **No Data**

Certification Data: The driller certified that the driller drilled this well (or the well was drilled under the driller's direct supervision) and that each and all of the statements herein are true and correct. The driller understood that failure to complete the required items will result in the log(s) being returned for completion and resubmittal.

Company  
Information:       **APOLLO Environmental Strategies, Inc.**  
                           **P. O. Box 12114**

**Beaumont , TX 77726**

Driller License Number: **51497**

Licensed Well Driller Signature: **Thomas A. Elms**

Registered Driller Apprentice Signature: **No Data**

Apprentice Registration Number: **No Data**

Comments: **No Data**

**IMPORTANT NOTICE FOR PERSONS HAVING WELLS DRILLED CONCERNING CONFIDENTIALITY**

TEX. OCC. CODE Title 12, Chapter 1901.251, authorizes the owner (owner or the person for whom the well was drilled) to keep information in Well Reports confidential. The Department shall hold the contents of the well log confidential and not a matter of public record if it receives, by certified mail, a written request to do so from the owner.

Please include the report's Tracking number (Tracking #182461) on your written request.

**Texas Department of Licensing & Regulation  
P.O. Box 12157  
Austin, TX 78711  
(512) 463-7880**

**DESC. & COLOR OF FORMATION MATERIAL**

**CASING, BLANK PIPE & WELL SCREEN DATA**

From (ft) To (ft)	Description
0-5.5	Dark brown to black silty clay with organic material; moist; soft; low plasticity.
5.5-14.5	Grey and orange mottled silty clay; moist; soft; medium plasticity.
14.5-16	Grey silt; moist; soft.
16-20	Reddish brown silt with grey mottling; moist; soft; friable.
20-24	Grey and brown mottled clay; wet; soft; high plasticity.

Dia.	New/Used	Type	Setting From/To
2	New	PVC Riser	0/4 Riser
2	New	PVC Screen	4/24 0.010

### STATE OF TEXAS WELL REPORT for Tracking #182464

Owner:	Cathedral of Faith Baptist Church	Owner Well #:	MW-3
Address:	3755 Fannett Rd. Beaumont , TX 77705	Grid #:	61-64-4
Well Location:	Fannett Rd. & Dolores St. Beaumont , TX 77705	Latitude:	30° 02' 55" N
Well County:	Jefferson	Longitude:	094° 07' 26" W
Elevation:	No Data	GPS Brand Used:	No Data
Type of Work: <b>New Well</b>		Proposed Use:	<b>Monitor</b>

Drilling Date:       Started: **6/1/2009**  
                           Completed: **6/1/2009**

Diameter of Hole:   Diameter: **6 in From Surface To 24 ft**

Drilling Method:    Other: **Flight Auger**

Borehole  
Completion:       Gravel Packed From: **2 ft to 24 ft**  
                           Gravel Pack Size: **16/30**

Annular Seal Data:  1st Interval: **From 0 ft to 1 ft with 1 concrete (#sacks and material)**  
                           2nd Interval: **From 1 ft to 2 ft with 1 bentonite (#sacks and material)**  
                           3rd Interval: **No Data**  
                           Method Used: **surface pour**  
                           Cemented By: **Thomas A. Elms**  
                           Distance to Septic Field or other Concentrated Contamination: **No Data**  
                           Distance to Property Line: **No Data**  
                           Method of Verification: **No Data**  
                           Approved by Variance: **No Data**

Surface  
Completion:       **Surface Slab Installed**

Water Level:       Static level: **No Data**  
                           Artesian flow: **No Data**

Packers:           **No Data**

Plugging Info:     Casing or Cement/Bentonite left in well: **No Data**

Type Of Pump:     **No Data**

Well Tests:        **No Data**

Water Quality:     Type of Water: **No Data**  
                           Depth of Strata: **No Data**  
                           Chemical Analysis Made: **No Data**  
                           Did the driller knowingly penetrate any strata which contained undesirable constituents: **No Data**

Certification Data: The driller certified that the driller drilled this well (or the well was drilled under the driller's direct supervision) and that each and all of the statements herein are true and correct. The driller understood that failure to complete the required items will result in the log(s) being returned for completion and resubmittal.

Company  
Information:       **APOLLO Environmental Strategies, Inc.**  
                           **P. O. Box 12114**

**Beaumont , TX 77726**

Driller License Number: **51497**

Licensed Well Driller Signature: **Thomas A. Elms**

Registered Driller Apprentice Signature: **No Data**

Apprentice Registration Number: **No Data**

Comments: **No Data**

**IMPORTANT NOTICE FOR PERSONS HAVING WELLS DRILLED CONCERNING CONFIDENTIALITY**

TEX. OCC. CODE Title 12, Chapter 1901.251, authorizes the owner (owner or the person for whom the well was drilled) to keep information in Well Reports confidential. The Department shall hold the contents of the well log confidential and not a matter of public record if it receives, by certified mail, a written request to do so from the owner.

Please include the report's Tracking number (Tracking #182464) on your written request.

**Texas Department of Licensing & Regulation  
P.O. Box 12157  
Austin, TX 78711  
(512) 463-7880**

**DESC. & COLOR OF FORMATION MATERIAL**

**CASING, BLANK PIPE & WELL SCREEN DATA**

From (ft) To (ft) Description  
 0-2 Dark brown to black clay with organic material; moist; soft; medium plasticity.  
 2-8 Grey and orange mottled clay; moist; semi stiff; medium plasticity.  
 8-10 Grey and orange mottled clay with some black speckles; moist; semi stiff; medium plasticity.  
 10-18 Grey and orange silty clay; moist; soft; low plasticity.  
 18-20 Grey and orange silty clay; moist; soft; friable; low plasticity.  
 20-24 Grey and orange silty clay; wet; soft; low plasticity.

Dia.	New/Used	Type	Setting From/To
2	New	PVC Riser	0/4 Riser
2	New	PVC Screen	4/24 0.010

5/10/08

CR 8246

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
PETROLEUM STORAGE TANK DIVISION  
CORRESPONDENCE IDENTIFICATION SHEET

LPST  
117939

Date: 16 July 2008  
Site Name: Former gasoline service station  
Site Address: Fannett Rd. & Dolores St.  
Beaumont, TX 77705

LPST ID No.: \_\_\_\_\_  
Facility ID No.: ~~None~~ NL95427 ←

RDR-17738 1

This checklist **must** accompany all correspondence submitted to the RPR Section and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence which you have submitted to the RPR Section. Check all boxes that apply if you are submitting more than one type of correspondence. If you cannot find an appropriate category, please complete the "other" section.

PROPOSALS		
<input type="checkbox"/> Initial Abatement (1)	<input type="checkbox"/> Tank Removal (2)	<input type="checkbox"/> Excavation (3)
<input type="checkbox"/> Waste Treatment (4)	<input type="checkbox"/> Site Assessment (5)	<input type="checkbox"/> Aquifer Testing (6)
<input type="checkbox"/> VES/Sparge Testing (7)	<input type="checkbox"/> Qtrly. GW Monitoring (8)	<input type="checkbox"/> CAP Prep. (9)
<input type="checkbox"/> GW Extrac./Treatment (10)	<input type="checkbox"/> Soil Vapor Extrac. (11)	<input type="checkbox"/> Operation & Main. (12)
<input type="checkbox"/> Site Closure (13)	<input type="checkbox"/> Plan A Risk Ass. (14)	<input type="checkbox"/> Plan B Risk Ass. (15)
<input type="checkbox"/> Semi-annual GW Mon. (16)*	<input type="checkbox"/> Annual GW Mon. (18)	<input type="checkbox"/> Product Recovery (19)
<input type="checkbox"/> Other proposal _____		

REPORTING FORMS	
<input type="checkbox"/> Assessment Report Form (TNRCC-0562)	<input type="checkbox"/> LPST Case Questionnaire
<input type="checkbox"/> Product Recovery Report Form (TNRCC-0016)	<input checked="" type="checkbox"/> Release Report Form (TNRCC-0621)
<input type="checkbox"/> Site Closure Request Form (TNRCC-0028)	<input type="checkbox"/> Monitoring Event Summary and Status Report (TNRCC-0013)
<input type="checkbox"/> Final Site Closure Report Form (TNRCC-0038)	<input type="checkbox"/> Priority 4 LPST Case Closure Request Form (TNRCC-0461)
<input type="checkbox"/> Other form _____	

REPORTS		
<input checked="" type="checkbox"/> Tank Closure/Removal	<input type="checkbox"/> Plan A Risk Assessment	<input type="checkbox"/> Annual Groundwater Monitoring
<input type="checkbox"/> O&M/Performance Mon.	<input type="checkbox"/> Plan B Risk Assessment	<input type="checkbox"/> CAP Installation/Modification
<input type="checkbox"/> Property Divestiture/Phase I ESA	<input type="checkbox"/> Corrective Action Plan (CAP)	<input type="checkbox"/> Aquifer/Pilot Test Results

MISCELLANEOUS	
<input type="checkbox"/> Off-site access assistance	<input type="checkbox"/> Deadline Extension Request
<input type="checkbox"/> Tank tightness test results	<input type="checkbox"/> Request for State-Lead
<input type="checkbox"/> Request for LPST Waste Code	<input type="checkbox"/> Class V ReInjection Request
<input type="checkbox"/> Notice to Owner/Operator for CAS Services	<input type="checkbox"/> Petroleum-Substance Waste Manifest
<input type="checkbox"/> Notice of Continuation of Groundwater Monitoring	<input checked="" type="checkbox"/> Underground Storage Tank Registration Form
<input type="checkbox"/> Notice of Continuation of Operation and Maintenance	<input type="checkbox"/> Aboveground Storage Tank Registration Form
<input type="checkbox"/> Other (anything that does not fit into one of the categories above) _____	

\* The proposal for semi-annual monitoring and annual report (Proposal Activity 17) has been discontinued. For semi-annual monitoring, use Proposal Activity 16.

WST LPST/ REPORTS

DARCY ENVIRONMENTAL GROUP

RECEIVED

1st: 2nd: 117939 Vol: 001 7/16/2008

OCT 24 2008

BBC: 100078229

OCT 28 2008

IBC: 100168131

REMEDIATION DIVISION



use the  
NL 95427 to  
file by.  
no facility  
#

I attest that all work has been conducted in accordance with accepted industry standards/practices and adhered to TNRCC guidance and rules. I certify that I am aware that misrepresentation of any of the above claims is a violation of 30 TAC 33.4453(b)(1)(E) and that this violation may result in the disciplinary actions set forth in 30 TAC 334.453 and or 334.463 and 334.465.

If a proposal is attached for preapproval, has the proposed work, in part or in whole, already been performed or in progress?  Yes  No

If yes, what work? \_\_\_\_\_

APOLLO® Environmental Strategies, Inc. 00021 Sept. 29, 2009  
(Registered Corrective Action Specialist) (RCAS Reg. No.) (Expiration date)

*Thomas A. Elms* 10/2/08  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

Thomas A. Elms 00337 Dec. 12, 2009  
(Project Manager) (CAPM Reg. No.) (Expiration date)

*Thomas A. Elms* 10/2/08  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

By signature below, I certify that documents checked above are included.

NIKKEE ESPREE MENAFFY WEBER, P.C.  
(Name of Responsible Party Contact) (Company)  
ATTORNEY FOR CATHEDRAL OF FAITH BC

*Nikkee Espree* 10/1/08  
(Signature) (Date)  
(409) 835-5011 (409) 835-5177  
(Telephone #) (FAX #)

RECEIVED  
OCT 24 2008  
REMEDIATION DIVISION



Texas Commission on Environmental Quality  
**PETROLEUM STORAGE TANK PROGRAM**  
**RELEASE DETERMINATION REPORT FORM**

**FORM INSTRUCTIONS:** Use this form to report the results of investigating a suspected or confirmed release or to report the results of permanent removal from service of a UST. The form should also be used to report the results of routine removal of an AST from service and/or for any routine environmental site assessment (ESA) at PST sites where a 'no further action' letter from TCEQ is desired (routine AST removals and routine ESAs are not specifically regulated by TCEQ). Please note that leaking PST sites reported to the agency on or after September 1, 2003 are potentially subject to 30 TAC 350 ("TRRP") as well as to 30 TAC 334. Refer to *Investigating and Reporting Releases from Petroleum Storage Tanks* (RG-411) for more information. Please also note that initial (w/in 24 hours) reporting of all suspected or confirmed releases should be made using the *PST Program Incident Report (IR) form* (TCEQ-20097). Submit completed forms to the PST-RPR, TCEQ, MC 137, P.O. Box 13087, Austin, Texas 78711-3087. **DO NOT MODIFY THIS FORM IN ANY WAY. Complete all applicable blanks.** Incomplete forms, including forms missing relevant attachments, will be returned without review.

**RDR FORM CHECKLIST**

**PLEASE NOTE: The following documents are required to be attached to this form upon submittal. Complete the checklist and attach each listed document to the back of the form, or provide a written statement explaining why a particular item on the checklist is not applicable/not available:**

- Copy of original Construction Notification form filed with the TCEQ regional office for the field construction activity
- Scaled site diagram(s) showing location & layout of tank system(s) including pipe chases, dispensers, and any remote fill ports; all sampling points, North arrow, scale, nearest intersection of main roads. Previously removed tank systems should also be indicated.
- Written description of tank removal activities, including removal of substances from tanks, tank cleaning/purging/inerting activities, and tank condition (corrosion holes, tears, rust, etc.). Include description of piping and dispenser equipment condition.
- Written description of site sampling activities, including sample equipment used, decontamination procedures, sample collection and handling methods, sampling locations and summary of overall sampling rationale.
- Copies of signed laboratory reports, complete chain-of-custody and laboratory check-in sheet documentation including sample receipt temperature, sample preservation methods, date and time of sample collection, laboratory QA/QC etc.
- Waste disposal, treatment, recycling or reuse documentation, including waste manifests signed and dated by all relevant parties. Manifests should have all required signatures and dates, and show waste type, quantities and units.
- Photographs (originals or high resolution color copies) of the site showing all parts of tank system (tanks, dispensers, piping, etc.), all excavated areas including excavation bottoms, stockpiles, etc. See Eco Checklist comments below.
- Tank destruction documentation (no. of tanks, size(s), former contents, tank composition [e.g., steel, fiberglass, etc.]) including date of disposal and facility name, address and contact information.
- Copy of amended *UST or AST Registration and Self-Certification form* (TCEQ-0724 or TCEQ-0659, respectively) as applicable. Originals should be sent to the PST Registration Team (MC-138), TCEQ, P.O. Box 13087, Austin, TX 78711-3087.
- Boring logs and well completion diagrams/well reports, as applicable. Logs should include field screening.
- Completed TRRP Tier 1 Ecological Exclusion Checklist (available at <http://www.TCEQ.state.tx.us/permitting/forms/eco.pdf>)  
**NOTE:** The Eco Checklist is mandatory for all sites which (a) report a PST release to TCEQ on or after September 1, 2003, (b) have chemicals of concern (COCs) present above the method quantitation limits (MQLs), and (c) desire to not be subject to TRRP assessment/remediation requirements. Persons planning on going directly into TRRP with their sites may submit the Eco Checklist later, as part of the APAR form (TCEQ-10325). See *Investigating and Reporting Releases from PSTs* (RG-411) for more information. Please note that the Eco Checklist itself also has required attachments - Part I, Item 1 requires one of the following to be attached "...to depict the affected property and surrounding area": USGS topographic map, aerial photographs, or "other affected property photographs". If photographs other than aerial are used, ensure that the entire photographic package submitted with this form depicts the tank systems & excavation bottoms as well as all site features pertinent to ecological evaluation.
- RCAS/CAPM and/or LOSS signatures are required on page 7 of this form.

## SUMMARY

Based on the information obtained during this release determination and by comparing the contaminant levels to the laboratory method quantitation limits (MQLs) and to the PST Program action levels, check all that apply:

- No contaminants were detected above the greater of MQLs or background.
- Contaminants were detected above MQLs/background, but below action levels.
- Contaminant levels were above action levels.
- Tank pit water was present. If present, sampled?  Yes  No
- A groundwater sample representative of the first water-bearing zone was collected and analyzed (i.e., monitoring well installed).
- A representative groundwater sample was collected and analyzed and one or more COCs exceeded action levels.
- The site does not pass the TRRP Tier 1 Ecological Exclusion Checklist.
- This site is a new LPST site (reported to the agency on or after September 1, 2003), and therefore is subject to 30 TAC 350.
- This site will enter TRRP and an Affected Property Assessment Report form (TCEQ-10325) is the next submittal.
- This site was initially reported to \_\_\_\_\_ (name, TCEQ office) on \_\_\_\_\_ (date prior to September 1, 2003) and therefore is subject to 30 TAC 334 only.
- This site is an existing LPST case, there is no new release, and this Release Determination Report is being submitted as the tank removal-from-service documentation.

Is the responsible party financially able to complete the next appropriate step?  **YES**  **NO** If no, and an LPST number is assigned to this case, you may contact the PST-RPR Section at 512/239-2200 to request information on the State-Lead option. Pursuit of this option requires submittal of detailed financial information including recent tax returns and other IRS documentation. Please note that pursuit of this option is only possible once an LPST number has been assigned.

**Answer the following question if this is an LPST case subject to 30 TAC 334 only (i.e., originally reported to agency prior to September 1, 2003, and no new release occurred after that date).**

Is this case eligible for reimbursement of necessary corrective actions?  **YES**  **NO** If not, appropriate corrective action in accordance with applicable rules and guidance may continue without specific direction or approval from the PST-RPR Section, however, coordination with PST-RPR is recommended. If the site is eligible for reimbursement, all corrective action activities, with the exception of initial NAPL recovery and emergency abatement activities, must be preapproved prior to initiation.

**A. GENERAL INFORMATION**

Pre-existing LPST ID No.?  NO  YES : \_\_\_\_\_ (LPST no[s].) TCEQ Region: 10

Facility ID No.: \_\_\_\_\_ Required unless one of the following applies:

- Check here if tank registration is not required for this site (per 30 TAC §334.7), and check one of the following as applicable:
  - the tank(s) are partially excluded or exempted from jurisdiction under 30 TAC Chapter 334. Specify type or usage of tank(s): \_\_\_\_\_
  - the tank(s) were permanently removed from the ground before May 8, 1986 (provide date of removal \_\_\_\_\_);
  - the tank(s) remained in the ground but were emptied, cleaned, and filled with inert substance before January 1, 1974 (provide date of activities: \_\_\_\_\_);
  - the tank(s) were out of operation, their existence was unknown (i.e., "ghost tank"), and they were permanently removed from service within 60 days of their discovery (provide date of discovery: unknown Describe method of discovery: NL 95427)

Tank Owner: Walter Kyles, Jr. Insurance

Tank Owner Mailing Address: 2875 Washington Blvd.

Tank Owner City: Beaumont State: TX Zip: 77705

Tank Owner Contact Person: Walter Kyles, Jr. Phone: (409) 842-3444 Fax no.: \_\_\_\_\_

Tank Operator (if different from tank owner): \_\_\_\_\_

Tank Operator Mailing Address: \_\_\_\_\_

Tank Operator City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Tank Operator Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax no.: \_\_\_\_\_

Land Owner (if different from tank owner and operator): \_\_\_\_\_

Land Owner Mailing Address: \_\_\_\_\_

Land Owner City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Land Owner Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax no.: \_\_\_\_\_

**If this site is a pre-existing LPST site with no new release or is a new LPST site which will be subject to TRRP (30 TAC 350), which of these parties will oversee the corrective actions at this site?**

Tank Owner  Tank Operator  Land Owner

Other (not the contractor or consultant): Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ Contact person: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Please note that no matter which party conducts corrective action, the tank owner and the tank operator are jointly responsible for the necessary corrective actions.

Facility Name: Former gasoline service station

Facility Physical Address: Corner of Fannett Rd. and Dolores St.

Facility City: Beaumont County: Jefferson County Code (see p. 8): 123

**A. GENERAL INFORMATION (continued)**

Indicate ALL tanks **currently and formerly** located at this site (attach pages as necessary):

	<u>Type (UST/AST)</u>	<u>Product Type</u>	<u>Size (approx. gal)</u>	
Current:	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
Former:	UST	Gasoline	1,000	<u>Date Removed from Service</u> 07/01/08
	UST	Gasoline	1,000	07/01/08
	_____	_____	_____	_____
	_____	_____	_____	_____
	_____	_____	_____	_____
	_____	_____	_____	_____
	_____	_____	_____	_____

**B. SUSPECTED RELEASE INFORMATION**

**Complete only this section and sections E through G as appropriate when the situation of a suspected release has occurred and it was documented that a release had not occurred.**

Date suspected release discovered: \_\_\_\_\_ Reason release suspected: \_\_\_\_\_

Date suspected release reported to TCEQ: \_\_\_\_\_ Reported to: \_\_\_\_\_

Possible source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown  
 Other: \_\_\_\_\_

Type of substance(s) suspected released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline  
 Jet Fuel (type: \_\_\_\_\_)  Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)  
 Other: (be specific) \_\_\_\_\_

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that all tanks and piping were tight?  YES or  NO (check one) If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs: \_\_\_\_\_

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any soil confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  
 YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, and laboratory results.

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  
 YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results. (Groundwater sampling is not required at this point unless there is reasonable suspicion of impact.)

### C. CONFIRMED RELEASE INFORMATION

Complete this section only if a release was confirmed; i.e., contaminant levels exceeded MQLs

Date release confirmed: 7/15/08 Date release reported to TCEQ: 7/16/08 Reported to: TCEQ Charmaine Costner

Is this the first release from a UST or AST discovered at this site?  YES  NO

Is there any other contamination or potential impacts to human health from any source other than the tank systems at this site?

YES  NO If yes, indicate type and location of contamination:

Reported to TCEQ by: Thomas A. Elms Representing: Walter Kyles, Jr.

Method of release discovery:

- Samples collected during tank removal-from-service activities  Impact to utility line  
 Samples collected during other tank system construction activities  Impact to surface water  
 Samples collected during release determination investigation  Impact to water well  
 Other:

Method of release confirmation: (check all that apply)

- Soil samples  Groundwater samples  Surface water samples  Documentation of presence of NAPL

Source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown

Other:

Substance(s) released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline

Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)

Jet Fuel (type: \_\_\_\_\_)  Other: (be specific) \_\_\_\_\_

Amount of product released: \_\_\_\_\_ Chemical Abstract Service registry #: \_\_\_\_\_ (for hazardous substances)

Were any soil samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods and laboratory results.

Type of native soil: (check one)  Clay or silt  Sand, gravel or rock

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results.

Known Impact(s): (check all that apply)  Soil  GW  Surface Water  Subsurface Utilities - type: \_\_\_\_\_

Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was the land owner (if different from the tank owner) notified of the contamination?  YES or  NO (check one) If Yes, attach copy of the letter which provided the notification. If No, documentation that notification was provided must be submitted within 30 days from the date the impact is discovered.

Possibly Threatened: (check all that apply)  GW  Surface Water  Subsurface Utilities - type: \_\_\_\_\_

Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was NAPL detected (greater than 0.01 feet)?  YES or  NO (check one) If yes, describe how and where it was detected, the thickness detected, and the recovery actions taken: \_\_\_\_\_

### D. ABATEMENT MEASURES

Were abatement measures initiated to stop the release or to recover the released substance?  YES or  NO (check one) If yes, describe the abatement and/or recovery measures taken and the dates and duration of the activities: \_\_\_\_\_

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test results. Did the tests indicate that all tanks and piping were tight?  YES or  NO If No, specify the portion(s) of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs: \_\_\_\_\_

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test results. Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

### E. FIRE/TCEQ/OTHER OFFICIALS NOTIFIED

Were any other officials notified?  YES  NO (check one) If Yes, indicate:

<u>Name</u>	<u>Representing</u>	<u>Phone number</u>	<u>Date(s) Notified</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Were any directives issued by the fire or other officials?  YES  NO If Yes, describe directives and actions taken in response to the directive: \_\_\_\_\_

### F. WASTE DISPOSITION

Indicate the status of all wastes and other materials generated:

<u>Type of waste (soil, water, product)</u>	<u>Quantity and Units</u>	<u>Method and location of disposal or treatment</u>
UST wastewater	1500 gals	Texas Water Management, The Woodlands TX
Steel tank	2	Recycled, Wright's Scrap Metal, Beaumont TX
_____	_____	_____
_____	_____	_____

**G. REPORT PREPARATION**

A Licensed On-Site Supervisor may complete and sign this form when the supervisor is acting in an approved capacity for tank removal-from-service or tank system repair activities.

Licensed On-Site Supervisor: \_\_\_\_\_ ILP Reg. No.: \_\_\_\_\_ Exp. Date: \_\_\_\_\_

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330 FAX No.: (409) 833-8363

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TCEQ published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**OR**

Project Manager: Thomas A. Elms PM Reg. No.: 00337 Exp. Date: 12/12/2009

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330 FAX No.: (409) 833-8363

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TCEQ published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

PM Signature: Thomas A. Elms Date: 10/2/08

**AND**

CAS Representative: Thomas A. Elms CAS Reg No.: 00021 Exp. Date: 09/29/2009

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330 FAX No.: (409) 833-8363

By my signature affixed below, I certify that I am the duly authorized representative of the Correction Action Specialist named and that I have personally reviewed the site investigation results and other relevant information presented herein and considered them to be in accordance with accepted standards/practices and in compliance with the applicable TCEQ published rules, guidelines and the laws of the State of Texas. Further, that the information presented herein is considered complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature of CAS Representative: Thomas A. Elms Date: 10/2/08

Name of Tank Owner or Operator, or property owner contact: NIKKEE ESPREE (ATTORNEY FOR CATHEDRAL OF FAITH BC)  
 Telephone No.: (409) 835-5011 FAX No.: (409) 835-5177

By my signature affixed below, I certify that I have reviewed this report for accuracy and completeness of information regarding points of contact and the facility and storage tank system history and status. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report related to the contact information, and the facility and storage tank system history and status information, I may be subject to administrative, civil, and/or criminal penalties. I attest that I have reviewed this report for accuracy and completeness. I understand that I am responsible for addressing this matter.

Signature: Nikkee Espree Date: 10/1/08

2008/JUN/25/WED 09:45 AM

P. 001/001

JUN 24 2008 10:21AM APOLLO

14098338363

P. 2

Received Fax Jun 25 2008 8:42AM Fax Station : APOLLO P. 1

FROM: WALTER KYLES, JR. & CO.

FAX NO. 14098429773

JUN 24 2008 10:28AM P. 1

JUN 24 2008 8:13AM APOLLO

14098338363

P. 1

*PST/Not Registered/CO*

### TEXAS NATURAL RESOURCE CONSERVATION COMMISSION UNDERGROUND & ABOVEGROUND STORAGE TANK CONSTRUCTION NOTIFICATION FORM

Underground Storage Tank (UST)  Aboveground Storage Tank (AST)

Stage I  Stage II (Vapor Recovery) CARB Order # \_\_\_\_\_

TYPE OF CONSTRUCTION: (Indicate all that apply)

Installation  Replacement  Improvement

Removal  Abandonment  Other (Specify) \_\_\_\_\_

*Corner of Fannell & Wilcox*

#### FACILITY LOCATION INFORMATION:

#### OWNER INFORMATION:

Facility Name: Former gasoline service station

Owner: Walter Kyles, Jr. Insurance

Address/Location: Corner of Fannell Street

Representative: Walter Kyles, Jr.

(No P.O. Box)

County: Jefferson City: Beaumont

Address: 2475 Washington

City/State/Zip: Beaumont TX 77705

Facility id #: Not Registered

Telephone: 409-842-1444

Telephone: NA

#### CONSULTANT INFORMATION:

#### CONTRACTOR INFORMATION:

Company: APOLLO Environmental Strategies, Inc.

Company: Same as consultant

Representative: Andy Elms

Representative: \_\_\_\_\_

Address: PO Box 12114

Address: \_\_\_\_\_

City/State/Zip: Beaumont TX 77726

City/State/Zip: \_\_\_\_\_

Telephone: 409-831-3330

Telephone: \_\_\_\_\_

CRP#: 001003 ILP#: 001503

#### GENERAL DESCRIPTION OF PROPOSED UST/AST ACTIVITY:

To permanently remove two UST's that are estimated to have a capacity of no more than 1,000 gallons each. The two UST's lie in close proximity to one another beneath a concrete slab. The tanks will be cleaned and properly labeled, also proper sampling and reporting will be completed. *ghost tanks*

#### SCHEDULED DATES FOR PROPOSED CONSTRUCTION:

#### SUBMITTED BY: (Signature)

6/26/08

*Walter Kyles Jr*

*w/ waiver of 30-day notice by Charmaine Cosner, TCEQ Beaumont*

Title & Company: OWNER

*ELK CONSULTING*

#### MAIL COMPLETED FORM TO:

Texas Natural Resource Conservation Commission  
Petroleum Storage Tank Division  
MC-135  
P.O. Box 13087  
Austin, TX 78711-3087

*30 day waiver granted  
C. Costner 6-25-08*

#### TNRCC STAFF USE ONLY

Date Rec'd: 6-24-08

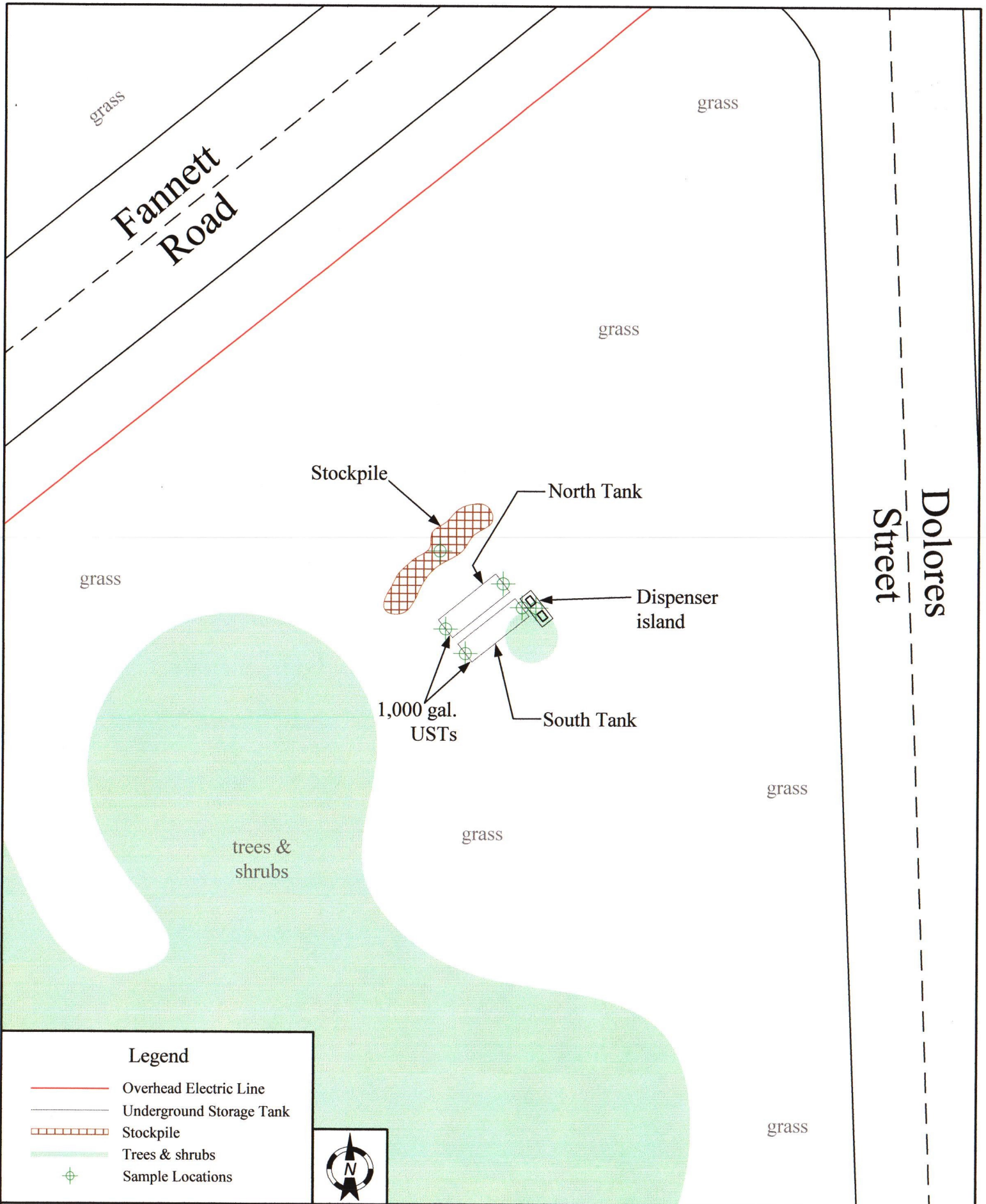
Region: 10

Remarks: 30 day waiver granted

Tracking #: \_\_\_\_\_

Logged By: CO





**Soil Sample Results**

in (mg/kg)

	MTBE	Benzene	Toluene	Ethylbenzene	Xylene	TPH C6 - C12	TPH C12 - C28	TPH C28 - C35	Total TPH
TRRP Tier I Com/Ind Soil PCLs	1.9	0.026	8.2	7.6	120	50	50	50	50
TRRP Tier I Res Soil PCLs	0.62	0.026	8.2	7.6	120	50	50	50	50
Sample ID	Date								
Stock Pile	<0.020	0.023	0.935	1.86	4.97	<b>148</b>	<b>730</b>	<b>3976</b>	<b>4854</b>
Pump Island	<0.010	<0.010	<0.010	<0.010	0.011	<50.0	<50.0	<50.0	<50.0
No. Tank Eastend	<0.020	<0.020	<0.020	<0.020	0.021	<50.0	<50.0	<50.0	<50.0
No. Tank Westend	<0.020	<b>0.157</b>	<0.020	0.138	0.154	<50.0	<50.0	<50.0	<50.0
So. Tank Eastend	<0.010	<b>0.675</b>	<0.010	0.669	0.146	<50.0	<50.0	<50.0	<50.0
So. Tank Westend	<0.010	<0.010	0.035	0.090	0.260	<50.0	<50.0	<50.0	<50.0

**BOLD** - indicates concentration above PCLs. (Action Level)

## **DESCRIPTION OF TANKS & PIPING AND REMOVAL, TRANSPORTATION, AND DISPOSITION OF THE TANKS AND WASTES**

The two USTs referenced in this report were steel, 1000 gallon gasoline tanks. The USTs were located under asphalt. The dispenser island and pump were located less than two feet east of the tanks (see Site Map). Visual observations of the exterior of the tanks revealed evidence to suggest that the tanks had leaked.

On July 1, 2008, APOLLO® arrived at the job site to perform the operations necessary to remove the tanks. The work area was cleared of obstructions and the asphalt and soil overburden were removed from atop and adjacent to the USTs. The contents of the tanks were pumped out and the inside of the tanks were rinsed. APOLLO® employed the services of Texas Water Management, LLP (TWM) to pump out and conduct a high pressure rinse of the inside of the USTs. TWM removed a total of approximately 1,500 gallons of residual product and rinsate (cleaning product and water) from the USTs.

The atmosphere of the USTs was monitored frequently to ensure that the LEL was acceptable before removing them from the excavation.

The UST were properly labeled per recommended protocol outlined in API 1604 before being transported off-site by APOLLO Environmental for recycling at Wright's Scrap Metal in Beaumont, Texas.

Soil samples were collected: one from beneath each end of the USTs, one from beneath the dispenser island and one composite sample from the stockpiled overburden from above and around the gasoline USTs. These samples were transported to Earth Analytical Sciences, Inc. in Beaumont, Texas by APOLLO®. The samples were analyzed for Total Petroleum Hydrocarbons (TPH) utilizing TNRCC TX Method 1005 and MTBE/BTEX utilizing EPA Method 8260B. The samples from beneath the west end of the north tank and the east end of the south tank were above the action level for benzene. The sample from the stockpile was above the action levels for TPH C6-C12, C12-C28, C28-35 and C6-C35.

The excavation was backfilled with imported select fill dirt and the stockpiled materials to bring it back to its original grade.

### Sample Collection and Handling Methods

The two USTs were removed by APOLLO Environmental of Beaumont, Texas on 7/1/08 at a former gasoline service station at the corner of Fannett Rd. and Dolores St., Beaumont, TX. Samples were collected beneath the tanks, beneath the dispenser island and from the stockpiled material associated with the tanks. Soil samples were collected with a hand trowel or hand corer, with decontamination of the equipment prior to collection of each sample. Each sample was placed in a clean 8 oz. glass jar, each jar was sealed, labeled, and preserved on ice for transport to the laboratory. Chain of custody documentation was completed and is included with this report.

LPST 117939-RP

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
PETROLEUM STORAGE TANK DIVISION  
CORRESPONDENCE IDENTIFICATION SHEET

Date: October 28, 2008  
Site Name: Former gasoline service station  
Site Address: Fannett Rd. & Dolores St.  
Beaumont, TX 77705

LPST ID No.: \_\_\_\_\_  
Facility ID No.: NL95427

TH2

Del Act

This checklist **must** accompany all correspondence submitted to the RPR Section and should be affixed to the front of your submittal as a cover page. Please check the appropriate box for the type of correspondence which you have submitted to the RPR Section. Check all boxes that apply if you are submitting more than one type of correspondence. If you cannot find an appropriate category, please complete the "other" section.

PROPOSALS		
<input type="checkbox"/> Initial Abatement (1)	<input type="checkbox"/> Tank Removal (2)	<input type="checkbox"/> Excavation (3)
<input type="checkbox"/> Waste Treatment (4)	<input type="checkbox"/> Site Assessment (5)	<input type="checkbox"/> Aquifer Testing (6)
<input type="checkbox"/> VES/Sparg Testing (7)	<input type="checkbox"/> Qtrly. GW Monitoring (8)	<input type="checkbox"/> CAP Prep. (9)
<input type="checkbox"/> GW Extrac./Treatment (10)	<input type="checkbox"/> Soil Vapor Extrac. (11)	<input type="checkbox"/> Operation & Main. (12)
<input type="checkbox"/> Site Closure (13)	<input type="checkbox"/> Plan A Risk Ass. (14)	<input type="checkbox"/> Plan B Risk Ass. (15)
<input type="checkbox"/> Semi-annual GW Mon. (16)*	<input type="checkbox"/> Annual GW Mon. (18)	<input type="checkbox"/> Product Recovery (19)
<input type="checkbox"/> Other proposal _____		

REPORTING FORMS	
<input type="checkbox"/> Assessment Report Form (TNRCC-0562)	<input type="checkbox"/> LPST Case Questionnaire
<input type="checkbox"/> Product Recovery Report Form (TNRCC-0016)	<input checked="" type="checkbox"/> Release Report Form (TNRCC-0621)
<input type="checkbox"/> Site Closure Request Form (TNRCC-0028)	<input type="checkbox"/> Monitoring Event Summary and Status Report (TNRCC-0013)
<input type="checkbox"/> Final Site Closure Report Form (TNRCC-0038)	<input type="checkbox"/> Priority 4 LPST Case Closure Request Form (TNRCC-0461)
<input type="checkbox"/> Other form _____	

REPORTS		
<input checked="" type="checkbox"/> Tank Closure/Removal	<input type="checkbox"/> Plan A Risk Assessment	<input type="checkbox"/> Annual Groundwater Monitoring
<input type="checkbox"/> O&M/Performance Mon.	<input type="checkbox"/> Plan B Risk Assessment	<input type="checkbox"/> CAP Installation/Modification
<input type="checkbox"/> Property Divestiture/Phase I ESA	<input type="checkbox"/> Corrective Action Plan (CAP)	<input type="checkbox"/> Aquifer/Pilot Test Results

Received

DEC 30 2008

MISCELLANEOUS	
<input type="checkbox"/> Off-site access assistance	<input type="checkbox"/> Deadline Extension Request
<input type="checkbox"/> Tank tightness test results	<input type="checkbox"/> Request for State-Lead
<input type="checkbox"/> Request for LPST Waste Code	<input type="checkbox"/> Class V Reinjection Request
<input type="checkbox"/> Notice to Owner/Operator for CAS Services	<input type="checkbox"/> Petroleum-Substance Waste Manifest
<input type="checkbox"/> Notice of Continuation of Groundwater Monitoring	<input checked="" type="checkbox"/> Underground Storage Tank Registration Form
<input type="checkbox"/> Notice of Continuation of Operation and Maintenance	<input type="checkbox"/> Aboveground Storage Tank Registration Form
<input type="checkbox"/> Other (anything that does not fit into one of the categories above) _____	

10/24/08

TCEQ  
Remediation Division

\* The proposal for semi-annual monitoring and annual report (Proposal Activity 17) has been discontinued. For semi-annual monitoring, use Proposal Activity 16.

WST LPST/ REPORTS

DARCY ENVIRONMENTAL GROUP

1st: 2nd: 117939 Vol: 001 10/28/2008

BBC: 100078229



IBC: 100168128



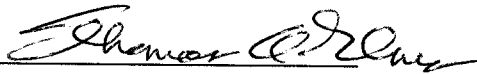
JAN 06 2009

I attest that all work has been conducted in accordance with accepted industry standards/practices and adhered to TNRCC guidance and rules. I certify that I am aware that misrepresentation of any of the above claims is a violation of 30 TAC 33.4453(b)(1)(E) and that this violation may result in the disciplinary actions set forth in 30 TAC 334.453 and or 334.463 and 334.465.

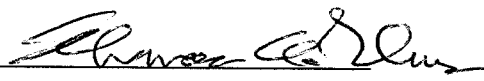
If a proposal is attached for preapproval, has the proposed work, in part or in whole, already been performed or in progress?  Yes  No

If yes, what work? \_\_\_\_\_

APOLLO® Environmental Strategies, Inc. 00021 Sept. 29, 2009  
(Registered Corrective Action Specialist) (RCAS Reg. No.) (Expiration date)

 11-24-08  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

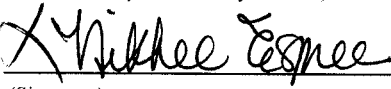
Thomas A. Elms 00337 Dec. 12, 2009  
(Project Manager) (CAPM Reg. No.) (Expiration date)

 11-24-08  
(Signature) (Date)  
(409) 833-3330 (409) 833-8363  
(Telephone #) (FAX #)

By signature below, I certify that documents checked above are included.

Nikkee Espree  
(Name of Responsible Party Contact)

ATTORNEY AT LAW  
Attorney for Cathedral of Faith BC  
(Company)

  
(Signature)

11/20/08  
(Date)

(409) 840-6193  
(Telephone #) *X10 for operator*

(409) 840-6195 *church fax*  
(FAX #)

DARCY ENVIRONMENTAL GROUP

JAN 06 2009

Texas Commission on Environmental Quality  
**PETROLEUM STORAGE TANK PROGRAM**  
**RELEASE DETERMINATION REPORT FORM**

**FORM INSTRUCTIONS:** Use this form to report the results of investigating a suspected or confirmed release or to report the results of permanent removal from service of a UST. The form should also be used to report the results of routine removal of an AST from service and/or for any routine environmental site assessment (ESA) at PST sites where a 'no further action' letter from TCEQ is desired (routine AST removals and routine ESAs are not specifically regulated by TCEQ). Please note that leaking PST sites reported to the agency on or after September 1, 2003 are potentially subject to 30 TAC 350 ("TRRP") as well as to 30 TAC 334. Refer to *Investigating and Reporting Releases from Petroleum Storage Tanks* (RG-411) for more information. Please also note that initial (w/in 24 hours) reporting of all suspected or confirmed releases should be made using the *PST Program Incident Report (IR) form* (TCEQ-20097). Submit completed forms to the PST-RPR, TCEQ, MC 137, P.O. Box 13087, Austin, Texas 78711-3087. **DO NOT MODIFY THIS FORM IN ANY WAY. Complete all applicable blanks.** Incomplete forms, including forms missing relevant attachments, will be returned without review.

**RDR FORM CHECKLIST**

**PLEASE NOTE: The following documents are required to be attached to this form upon submittal. Complete the checklist and attach each listed document to the back of the form, or provide a written statement explaining why a particular item on the checklist is not applicable/not available:**

- Copy of original Construction Notification form filed with the TCEQ regional office for the field construction activity
- Scaled site diagram(s) showing location & layout of tank system(s) including pipe chases, dispensers, and any remote fill ports; all sampling points, North arrow, scale, nearest intersection of main roads. Previously removed tank systems should also be indicated.
- Written description of tank removal activities, including removal of substances from tanks, tank cleaning/purging/inerting activities, and tank condition (corrosion holes, tears, rust, etc.). Include description of piping and dispenser equipment condition.
- Written description of site sampling activities, including sample equipment used, decontamination procedures, sample collection and handling methods, sampling locations and summary of overall sampling rationale.
- Copies of signed laboratory reports, complete chain-of-custody and laboratory check-in sheet documentation including sample receipt temperature, sample preservation methods, date and time of sample collection, laboratory QA/QC etc.
- Waste disposal, treatment, recycling or reuse documentation, including waste manifests signed and dated by all relevant parties. Manifests should have all required signatures and dates, and show waste type, quantities and units.
- Photographs (originals or high resolution color copies) of the site showing all parts of tank system (tanks, dispensers, piping, etc.), all excavated areas including excavation bottoms, stockpiles, etc. See Eco Checklist comments below.
- Tank destruction documentation (no. of tanks, size(s), former contents, tank composition [e.g., steel, fiberglass, etc.]) including date of disposal and facility name, address and contact information.
- Copy of amended *UST or AST Registration and Self-Certification form* (TCEQ-0724 or TCEQ-0659, respectively) as applicable. Originals should be sent to the PST Registration Team (MC-138), TCEQ, P.O. Box 13087, Austin, TX 78711-3087.
- Boring logs and well completion diagrams/well reports, as applicable. Logs should include field screening.
- Completed TRRP Tier 1 Ecological Exclusion Checklist (available at <http://www.TCEQ.state.tx.us/permits/remediation/registration>)  
**NOTE:** The Eco Checklist is mandatory for all sites which (a) report a PST release to TCEQ on or after September 1, 2003, (b) have chemicals of concern (COCs) present above the method quantitation limits (MQLs), and (c) desire to not be subject to TRRP assessment/remediation requirements. Persons planning on going directly into TRRP with their sites may submit the Eco Checklist later, as part of the APAR form (TCEQ-10325). See *Investigating and Reporting Releases from PSTs* (RG-411) for more information. Please note that the Eco Checklist itself also has required attachments - Part I, Item 1 requires one of the following to be attached "...to depict the affected property and surrounding area": USGS topographic map, aerial photographs, or "other affected property photographs". If photographs other than aerial are used, ensure that the entire photographic package submitted with this form depicts the tank systems & excavation bottoms as well as all site features pertinent to ecological evaluation.
- RCAS/CAPM and/or LOSS signatures are required on page 7 of this form.

Received

DEC 30 2008

TCEQ  
Remediation/Registration

## SUMMARY

Based on the information obtained during this release determination and by comparing the contaminant levels to the laboratory method quantitation limits (MQLs) and to the PST Program action levels, check all that apply:

- No contaminants were detected above the greater of MQLs or background.
- Contaminants were detected above MQLs/background, but below action levels.
- Contaminant levels were above action levels.
- Tank pit water was present. If present, sampled?  Yes  No
- A groundwater sample representative of the first water-bearing zone was collected and analyzed (i.e., monitoring well installed).
- A representative groundwater sample was collected and analyzed and one or more COCs exceeded action levels.
- The site does not pass the TRRP Tier 1 Ecological Exclusion Checklist.
- This site is a new LPST site (reported to the agency on or after September 1, 2003), and therefore is subject to 30 TAC 350.
- This site will enter TRRP and an Affected Property Assessment Report form (TCEQ-10325) is the next submittal.
- This site was initially reported to \_\_\_\_\_ (name, TCEQ office) on \_\_\_\_\_ (date prior to September 1, 2003) and therefore is subject to 30 TAC 334 only.
- This site is an existing LPST case, there is no new release, and this Release Determination Report is being submitted as the tank removal-from-service documentation.

Is the responsible party financially able to complete the next appropriate step?  **YES**  **NO** If no, and an LPST number is assigned to this case, you may contact the PST-RPR Section at 512/239-2200 to request information on the State-Lead option. Pursuit of this option requires submittal of detailed financial information including recent tax returns and other IRS documentation. Please note that pursuit of this option is only possible once an LPST number has been assigned.

**Answer the following question if this is an LPST case subject to 30 TAC 334 only (i.e., originally reported to agency prior to September 1, 2003, and no new release occurred after that date).**

Is this case eligible for reimbursement of necessary corrective actions?  **YES**  **NO** If not, appropriate corrective action in accordance with applicable rules and guidance may continue without specific direction or approval from the PST-RPR Section, however, coordination with PST-RPR is recommended. If the site is eligible for reimbursement, all corrective action activities, with the exception of initial NAPL recovery and emergency abatement activities, must be preapproved prior to initiation.



**A. GENERAL INFORMATION**

Pre-existing LPST ID No.?  NO  YES : \_\_\_\_\_ (LPST no[s].) TCEQ Region: 10

Facility ID No.: NL95427 Required unless one of the following applies:

- Check here if tank registration is not required for this site (per 30 TAC §334.7), **and** check one of the following as applicable:
  - the tank(s) are partially excluded or exempted from jurisdiction under 30 TAC Chapter 334. Specify type or usage of tank(s): \_\_\_\_\_
  - the tank(s) were permanently removed from the ground before May 8, 1986 (provide date of removal \_\_\_\_\_);
  - the tank(s) remained in the ground but were emptied, cleaned, and filled with inert substance before January 1, 1974 (provide date of activities: \_\_\_\_\_);
  - the tank(s) were out of operation, their existence was unknown (i.e., "ghost tank"), **and** they were permanently removed from service within 60 days of their discovery (provide date of discovery: \_\_\_\_\_. Describe method of discovery: \_\_\_\_\_)

Tank Owner: Cathedral of Faith BC

Tank Owner Mailing Address: 3755 Fannett Rd.

Tank Owner City: Beaumont State: TX Zip: 77705

Tank Owner Contact Person: Nikkee Espree, / Delbert A. Mack, Sr. Phone: 409-840-6163 Fax no.: 409-840-6195

Tank Operator (if different from tank owner): \_\_\_\_\_

Tank Operator Mailing Address: \_\_\_\_\_

Tank Operator City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Tank Operator Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax no.: \_\_\_\_\_

Land Owner (if different from tank owner and operator): \_\_\_\_\_

Land Owner Mailing Address: \_\_\_\_\_

Land Owner City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Land Owner Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax no.: \_\_\_\_\_

**If this site is a pre-existing LPST site with no new release or is a new LPST site which will be subject to TRRP (30 TAC 350), which of these parties will oversee the corrective actions at this site?**

Tank Owner  Tank Operator  Land Owner

Other (not the contractor or consultant): Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ Contact person: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Please note that no matter which party conducts corrective action, the tank owner and the tank operator are jointly responsible for the necessary corrective actions.

Facility Name: Former bulk storage facility (Former ops station) int a bulk facility

Facility Physical Address: Corner of Fannett Rd. and Delores St.

Facility City: Beaumont County: Jefferson County Code (see p. 8): 123

**A. GENERAL INFORMATION (continued)**

Indicate ALL tanks **currently and formerly** located at this site (attach pages as necessary):

	<u>Type (UST/AST)</u>	<u>Product Type</u>	<u>Size (approx. gal)</u>	<u>Date Removed from Service</u>
Current:	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
	_____	_____	_____	
Former:	<u>UST</u>	<u>Diesel</u>	<u>12,000</u>	<u>10/10/08</u>
	<u>UST</u>	<u>Diesel</u>	<u>12,000</u>	<u>10/10/08</u>
	<u>UST</u>	<u>Diesel</u>	<u>12,000</u>	<u>10/10/08</u>
	<u>UST</u>	<u>Diesel</u>	<u>20,000</u>	<u>10/10/08</u>
	_____	_____	_____	_____
	_____	_____	_____	_____

**B. SUSPECTED RELEASE INFORMATION**

**Complete only this section and sections E through G as appropriate when the situation of a suspected release has occurred and it was documented that a release had not occurred.**

Date suspected release discovered: \_\_\_\_\_ Reason release suspected: \_\_\_\_\_

Date suspected release reported to TCEQ: \_\_\_\_\_ Reported to: \_\_\_\_\_

Possible source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown  
 Other: \_\_\_\_\_

Type of substance(s) suspected released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline  
 Jet Fuel (type: \_\_\_\_\_)  Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)  
 Other: (be specific) \_\_\_\_\_

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that all tanks and piping were tight?  YES or  NO (check one) If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs: \_\_\_\_\_

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test data and results.  
 Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any soil confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  
 YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, and laboratory results.

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, were all potential source areas investigated?  
 YES or  NO If samples were collected, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results. (Groundwater sampling is not required at this point unless there is reasonable suspicion of impact.)

### C. CONFIRMED RELEASE INFORMATION

Complete this section only if a release was confirmed; i.e., contaminant levels exceeded MQLs

Date release confirmed: 10/17/08 Date release reported to TCEQ: \_\_\_\_\_ Reported to: \_\_\_\_\_

Is this the first release from a UST or AST discovered at this site?  YES  NO

Is there any other contamination or potential impacts to human health from any source other than the tank systems at this site?  
 YES  NO If yes, indicate type and location of contamination: \_\_\_\_\_

Reported to TCEQ by: Andy Elms Representing: Cathedral of Faith Baptist Church

Method of release discovery:

- Samples collected during tank removal-from-service activities  Impact to utility line  
 Samples collected during other tank system construction activities  Impact to surface water  
 Samples collected during release determination investigation  Impact to water well  
 Other: \_\_\_\_\_

Method of release confirmation: (check all that apply)

- Soil samples  Groundwater samples  Surface water samples  Documentation of presence of NAPL

Source(s) of release: (check all that apply) Tanks:  USTs  ASTs  Piping  Overfills/spills  Unknown  
 Other: \_\_\_\_\_

Substance(s) released: (check all that apply)  Gasoline  Diesel  Used Oil  Aviation Gasoline  
 Alcohol-blended fuel (Type and percentage of alcohol: \_\_\_\_\_)  
 Jet Fuel (type: \_\_\_\_\_)  Other: (be specific) \_\_\_\_\_

Amount of product released: \_\_\_\_\_ Chemical Abstract Service registry #: \_\_\_\_\_ (for hazardous substances)

Were any soil samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods and laboratory results.

Type of native soil: (check one)  Clay or silt  Sand, gravel or rock

Were any groundwater confirmation samples collected?  YES or  NO (check one) If yes, attach descriptions of sample locations, collection methods, aquifer name, and laboratory results.

Known Impact(s): (check all that apply)  Soil  GW  Surface Water  Subsurface Utilities - type: \_\_\_\_\_  
 Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was the land owner (if different from the tank owner) notified of the contamination?  YES or  NO (check one) If Yes, attach copy of the letter which provided the notification. If No, documentation that notification was provided must be submitted within 30 days from the date the impact is discovered.

Possibly Threatened: (check all that apply)  GW  Surface Water  Subsurface Utilities - type: \_\_\_\_\_  
 Buildings  Water wells  Other sensitive receptors: \_\_\_\_\_

Was NAPL detected (greater than 0.01 feet)?  YES or  NO (check one) If yes, describe how and where it was detected, the thickness detected, and the recovery actions taken: \_\_\_\_\_  
\_\_\_\_\_

### D. ABATEMENT MEASURES - NA

Were abatement measures initiated to stop the release or to recover the released substance?  YES or  NO (check one) If yes, describe the abatement and/or recovery measures taken and the dates and duration of the activities: \_\_\_\_\_

Were UST/AST system tank and/or line tightness tests performed?  YES or  NO (check one) If yes, attach test results. Did the tests indicate that all tanks and piping were tight?  YES or  NO If No, specify the portion(s) of the tank system(s) that were found not to be tight: \_\_\_\_\_

Were any repairs conducted on the tank system(s)?  YES or  NO (check one) If yes, describe type(s) and location of repairs: \_\_\_\_\_

Were tightness tests performed after repairs were conducted?  YES or  NO (check one) If yes, attach test results. Did the tests indicate that the repaired items were tight?  YES or  NO If No, specify the portion of the tank system(s) that were found not to be tight: \_\_\_\_\_

### E. FIRE/TCEQ/OTHER OFFICIALS NOTIFIED

Were any other officials notified?  YES  NO (check one) If Yes, indicate:

<u>Name</u>	<u>Representing</u>	<u>Phone number</u>	<u>Date(s) Notified</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Were any directives issued by the fire or other officials?  YES  NO If Yes, describe directives and actions taken in response to the directive: \_\_\_\_\_

### F. WASTE DISPOSITION

Indicate the status of all wastes and other materials generated:

<u>Type of waste (soil, water, product)</u>	<u>Quantity and Units</u>	<u>Method and location of disposal or treatment</u>
<u>Wastewater and product</u>	<u>52,800 gals.</u>	<u>Action Oil Service, Inc. , Beaumont TX - recycle</u>
<u>Steel tanks</u>	<u>3 - 12,000</u>	<u>Wright's Scrap Metal, Beaumont TX - recycle</u>
<u>Steel tanks</u>	<u>1 - 20,000</u>	<u>Wright's Scrap Metal, Beaumont TX - recycle</u>

### G. REPORT PREPARATION

A Licensed On-Site Supervisor may complete and sign this form when the supervisor is acting in an approved capacity for tank removal-from-service or tank system repair activities.

Licensed On-Site Supervisor: \_\_\_\_\_ ILP Reg. No.: \_\_\_\_\_ Exp. Date: \_\_\_\_\_

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330

FAX No.: (409) 833-8363

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TCEQ published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature: *Thomas A. Elms* Date: 11/24/08

**OR**

Project Manager: Thomas A. Elms PM Reg. No.: 00337 Exp. Date: 12/12/2009

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330

FAX No.: (409) 833-8363

Based on the results of the site investigation and the additional information presented herein, I certify that the site investigation activities performed either by me, or under my direct supervision, including subcontracted work, were conducted in accordance with accepted industry standards/practices and further, that all such tasks were conducted in compliance with applicable TCEQ published rules, guidelines and the laws of the State of Texas. I have reviewed the information included within this report, and consider it to be complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

PM Signature: *Thomas A. Elms* Date: 11/24/08

**AND**

CAS Representative: Thomas A. Elms CAS Reg No.: 00021 Exp. Date: 09/29/2009

Company: APOLLO Environmental Strategies, Inc.

Telephone No.: (409) 833-3330

FAX No.: (409) 833-8363

By my signature affixed below, I certify that I am the duly authorized representative of the Correction Action Specialist named and that I have personally reviewed the site investigation results and other relevant information presented herein and considered them to be in accordance with accepted standards/practices and in compliance with the applicable TCEQ published rules, guidelines and the laws of the State of Texas. Further, that the information presented herein is considered complete, accurate and representative of the conditions discovered during the site investigation. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report, I may be subject to administrative, civil, and/or criminal penalties.

Signature of CAS Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Name of Tank Owner or Operator, or property owner contact: Nikkee Espree, ATTORNEY / DELBERT A. MACK, SR. (Pastor)

Telephone No.: 409-840-6163

FAX No.: 409-840-6195

By my signature affixed below, I certify that I have reviewed this report for accuracy and completeness of information regarding points of contact and the facility and storage tank system history and status. I acknowledge that if I intentionally or knowingly make false statements, representations, or certifications in this report related to the contact information, and the facility and storage tank system history and status information, I may be subject to administrative, civil, and/or criminal penalties. I attest that I have reviewed this report for accuracy and completeness. I understand that I am responsible for addressing this matter.

Signature: *Nikkee Espree* Date: 11/20/08

08/01/08 FRI 10:31 FAX 14098353790 MEHAFFY & WEBER  
Aug 01 2008 9:20AM APOLLO Environmental 14098398363

002

P.2

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
UNDERGROUND & ABOVEGROUND STORAGE TANK  
CONSTRUCTION NOTIFICATION FORM**

8/1/08  
C. Costner

X Underground Storage Tank (UST)  Aboveground Storage Tank (AST)

Stage I  Stage II (Vapor Recovery) CARB Order # \_\_\_\_\_

**TYPE OF CONSTRUCTION:** (Indicate all that apply)

Installation  Replacement  Improvement

X Removal  Abandonment  Other (Specify) \_\_\_\_\_

**FACILITY LOCATION INFORMATION:**

Facility Name: Former gasoline service station  
Address/Location: Fannett Rd/Delores (between Fannett and Elmira St on Delores St) (No P.O. Box)

County: Jefferson City: Beaumont

Facility id. #: \_\_\_\_\_

Telephone: NA

**CONSULTANT INFORMATION:**

Company: APOLLO Environmental Strategies, Inc.

Representative: Andy Elms

Address: PO Box 12114

City/State/Zip: Beaumont TX 77726

Telephone: 409-833-3330

**OWNER INFORMATION:**

Owner: Cathedral of Faith Baptist Church  
Representative: Nikkee Espree, Mehaffy Weber, PC

Address: 2615 Calder, #800  
City/State/Zip: Beaumont TX 77704

Telephone: 409-835-5011

**CONTRACTOR INFORMATION:**

Company: Same as consultant

Representative: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

CRP#: 001003 ILP#: 001503

**GENERAL DESCRIPTION OF PROPOSED UST/AST ACTIVITY:**

To permanently remove two UST's that are estimated to have a capacity of 5,000 gallons each. The two UST's lie in close proximity to one another beneath grass and soil. The tanks will be cleaned and properly labeled, also proper sampling and reporting will be completed.

**SCHEDULED DATES FOR PROPOSED CONSTRUCTION:**

8/06/08

waiver of 30-day notice by Charmaine Costner, TCEQ Beaumont

**SUBMITTED BY: (Signature)**

Nikkee Espree

Title & Company: Mehaffy Weber, PC

**MAIL COMPLETED FORM TO:**

Texas Natural Resource Conservation Commission  
Petroleum Storage Tank Division

IC-135

P.O. Box 13087

Austin, TX 78711-3087

NRCC-0495 (4-1-95)

**TNRCC STAFF USE ONLY**

Date Rec'd: \_\_\_\_\_

Region: \_\_\_\_\_

Remarks: \_\_\_\_\_  
Tracking #: \_\_\_\_\_

Logged By: \_\_\_\_\_

Fannett Road

Dolores Street

gasoline UST system removed July 2008  
RDR rec'd  
LPST issued 117939

Location of previously removed USTs & pump island

map

Stockpile

Diesel UST system

Tank 4

Tank 1  
Tank 2  
Tank 3

trees & grass

Legend

- - - - - Fenceline
- - - - - Drainage Ditch
- Overhead Electric Line
- Underground Storage Tank
- xxxxxxx Stockpile
- Trees & grass
- ⊕ Sample Locations

Apartment Bldg.

Apartment Bldg.



concrete

**APOLLO**<sup>®</sup>

**ENVIRONMENTAL STRATEGIES, INC.**

**LABORATORY ANALYTICAL RESULTS  
of  
SOIL SAMPLING  
at**

**Cathedral of Faith Baptist Church,  
Fannett Rd. & Dolores St.,  
Beaumont, TX 77705**

**P.O. BOX 12114 • BEAUMONT, TX 77726-2114  
(409)833-3330 • FAX (409)833-8363**



**Soil Sample Results**

in (mg/kg)

	MTBE	Benzene	Toluene	Ethylbenzene	Xylene	TPH C6 - C12	TPH C12 - C28	TPH C28 - C35	Total TPH
TRRP Tier I Com/Ind Soil PCLs	1.9	0.026	8.2	7.6	120	50	50	50	50
TRRP Tier I Res Soil PCLs	0.62	0.026	8.2	7.6	120	50	50	50	50
Sample ID	Date								
Tank #1 N	10/10/08	<0.010	<0.010	<0.010	<0.010	77.4	284	<50.0	362
Tank #1 S	10/10/08	<0.010	<0.010	<0.010	<0.010	<50.0	149	<50.0	149
Tank #2 N	10/10/08	<0.010	<0.010	<0.010	<0.010	71.3	229	<50.0	301
Tank #2 S	10/10/08	<0.010	<0.010	<0.010	<0.010	67.5	269	<50.0	337
Tank #3 N	10/10/08	<0.010	<0.010	<0.010	<0.010	<50.0	<50.0	<50.0	<50.0
Tank #3 S	10/10/08	<0.010	<0.010	<0.010	<0.010	133	394	<50.0	527
Tank #4 N	10/10/08	<0.010	<0.010	<0.010	<0.010	<50.0	<50.0	<50.0	<50.0
Tank #4 Mid	10/10/08	<0.010	<0.010	<0.010	<0.010	101	431	<50.0	532
Tank #4 S	10/10/08	<0.010	<0.010	<0.010	<0.010	<50.0	<50.0	<50.0	<50.0
Stockpile	10/10/08	<0.010	<0.010	<0.010	0.036	<50.0	87.5	<50.0	87.5

**BOLD** - indicates concentration above PCLs. (Action Level)

*no PAH analysis*

*Soil table*

## **DESCRIPTION OF TANKS & PIPING AND REMOVAL, TRANSPORTATION, AND DISPOSITION OF THE TANKS AND WASTES**

The four USTs referenced in this report were steel, one being 18,900 gallons and the other three were 10,000 gallon gasoline tanks. The USTs were located under soil. The dispenser island and pump, if ever existing, were removed previously by others. Visual observations of the exterior of the tanks revealed evidence to suggest that the tanks had leaked. ✓

On October 3, 2008, the contents of the tanks were pumped out and the inside of the tanks were rinsed. APOLLO® employed the services of Action Oil Services, Inc. to pump out and conduct a high pressure rinse of the inside of the UST. Action Oil removed a total of approximately 52,800 gallons of residual product and rinsate (cleaning product and water) from the UST's.

On October 10, 2008, APOLLO® arrived at the job site to perform the operations necessary to remove the tank. The work area was cleared of obstructions and the soil overburden was removed from atop and adjacent to the USTs.

The atmosphere of the UST's was monitored frequently to ensure that the LEL was acceptable before removing them from the excavation.

The UST's were properly labeled per recommended protocol outlined in API 1604 before being transported off-site by APOLLO Environmental for recycling at Wright's Scrap Metal in Beaumont, Texas.

Soil samples were collected: one from beneath each end of three (12,000 gal.) of the USTs, three from beneath the 18,900 gal. UST and one composite sample from the stockpiled overburden from above and around the gasoline USTs. These samples were transported to Earth Analytical Sciences, Inc. in Beaumont, Texas by APOLLO®. The samples were analyzed for Total Petroleum Hydrocarbons (TPH) utilizing TNRCC TX Method 1005 and MTBE/BTEX utilizing EPA Method 8260B. Samples from beneath each UST were above the screening levels for TPH C6-C12 and C12-C28. The sample from the stockpile was above the action level for benzene. ✓

The excavation was backfilled with imported select fill dirt and the stockpiled materials to bring it back to its original grade.

### Sample Collection and Handling Methods

Four gasoline USTs were removed by APOLLO® Environmental of Beaumont, Texas on 10/10/08 at a former gasoline service station at the intersection of Fannett Road and Dolores Street, Beaumont, TX. Samples were collected from beneath each tank and from the stockpiled material associated with the tanks. Soil samples were collected with a hand trowel or hand corer, with decontamination of the equipment prior to collection of each sample. Each sample was placed in a clean 8 oz. glass jar, each jar was sealed, labeled, and preserved on ice for transport to the laboratory. Chain of custody documentation was completed and is included with this report.



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**EXXONMOBIL PIPELINE BEAUMONT OFFICE**  
**6810 S MAJOR DR**  
**BEAUMONT, TX 77705-7206**



*\*You can navigate within the map with your mouse.*

**EPA Facility Information**

*This query was executed on JUN-21-2018*

**RCRAInfo**

<b><u>HANDLER ID:</u></b>	TXR000084064
---------------------------	--------------

**LIST OF NAICS CODES AND DESCRIPTIONS**

<b><u>NAICS CODE</u></b>	<b><u>NAICS DESCRIPTION</u></b>
48691	PIPELINE TRANSPORTATION OF REFINED PETROLEUM PRODUCTS

**HANDLER / FACILITY CLASSIFICATION**

**Unspecified Universe for the facility listed above.**

<b><u>HANDLER TYPE</u></b>
Small Quantity Generator

**No PROCESS INFORMATION is available for the facility listed above.**

Additional Information can be obtained from Resource Conservation and Recovery Information **RCRAInfo** Search.





**Related Topics:** Envirofacts

FRS

# FRS Facility Detail Report

## EXXONMOBIL PIPELINE BEAUMONT OFFICE

**EPA Registry Id:** 110070207294  
 6810 S MAJOR DR  
 BEAUMONT, TX 77705-7206

### Legend

- ★ Selected Facility
- EPA Facility of Interest
- State/Tribe Facility of Interest

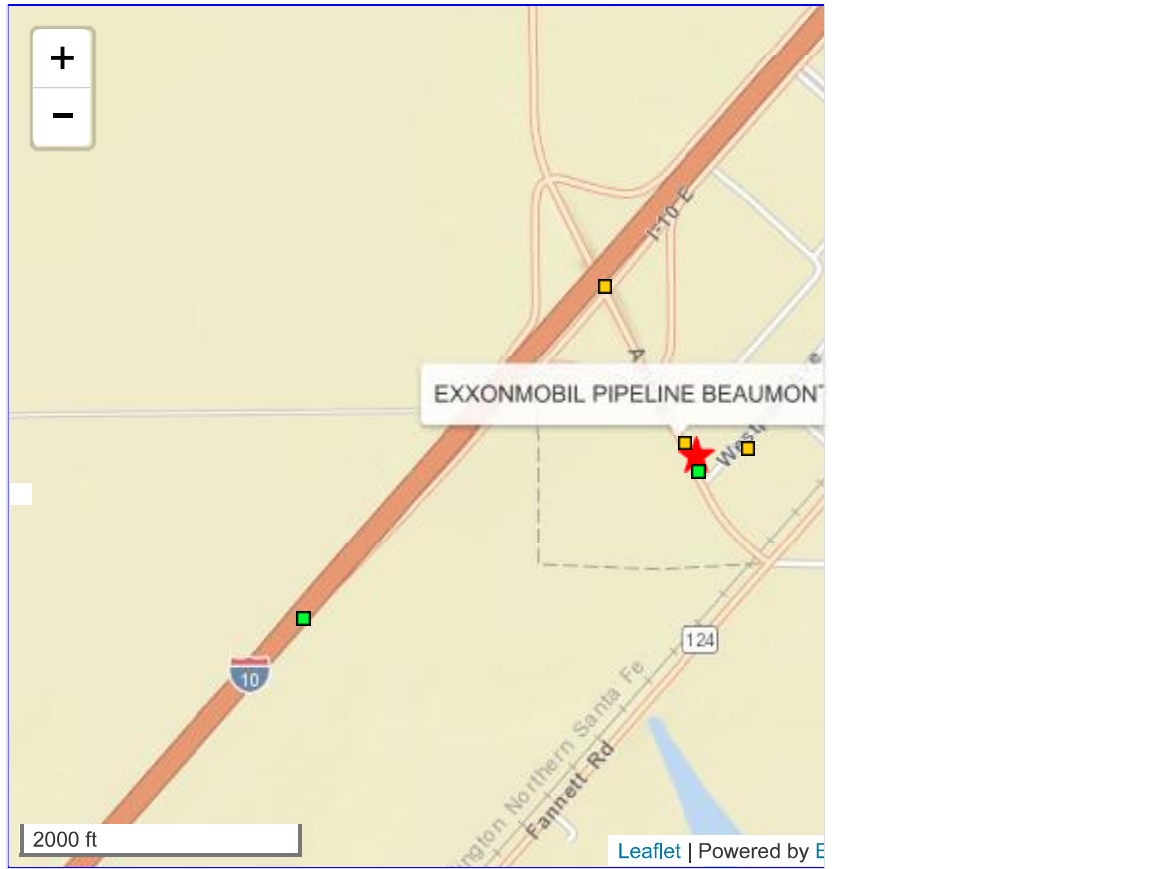
The facility locations displayed come from the FRS Spatial Coordinates tables. They are the best representative locations for the displayed facilities based on the accuracy of the collection method and quality assurance checks performed against each location. The North American Datum of 1983 is used to display all coordinates.

### Facility Registry Service Links:

- Facility Registry Service (FRS) Overview
- FRS Facility Query
- FRS Organization Query
- EZ Query
- FRS Physical Data Model
- FRS Geospatial Model

[Report an Error](#)





### Environmental Interests

Information System	System Facility Name	Information System Id/Report Link	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	EXXONMOBIL PIPELINE BEAUMONT OFFICE	TXR000084064	SQG (Y)	RCRAINFO	02/15/2018	
<b>Additional EPA Reports:</b>	MyEnvironment Enforcement and Compliance Site Demographics Facility Coordinates Viewer Environmental Justice Map Viewer Watershed Report					

Standard Industrial Classification Codes (SIC)		National Industry Classification System Codes (NAICS)		
No SIC Codes returned.				
Facility Codes and Flags		National Industry Classification System Codes (NAICS)		
EPA Region:	06	Data Source	NAICS Code	Description
Duns Number:		RCRAINFO	48691	PIPELINE TRANSPORTATION OF REFINED PETROLEUM PRODUCTS
Congressional District Number:	14			Primary
Legislative District Number:				
HUC Code/Watershed:	12040201 / SABINE LAKE	Facility Mailing Addresses		
US Mexico Border Indicator:	NO	No Facility Mailing Addresses returned.		
Federal Facility:	NO	Contacts		
Tribal Land:	NO	No Contacts returned.		
Alternative Names				
No Alternative Names returned.				
Organizations				
No Organizations returned.				

Query executed on: JUN-21-2018

Last updated on September 24, 2015

# Detailed Facility Report

## Facility Summary

**EXXONMOBIL PIPELINE BEAUMONT OFFICE**

**6810 S MAJOR DR, BEAUMONT, TX 77705** ⓘ

FRS (Facility Registry Service) ID: 110070207294

EPA Region: 06

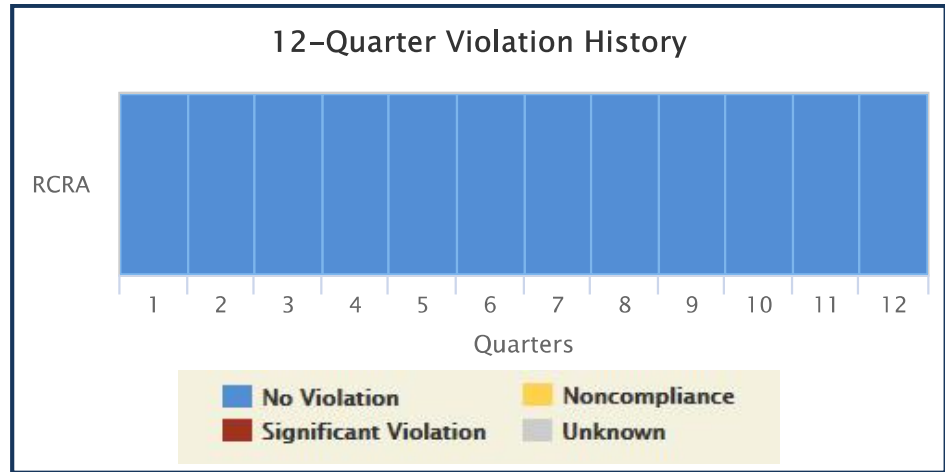
Latitude: 30.0046

Longitude: -94.18593

Locational Data Source: FRS

Industry: Pipeline Transportation

Indian Country: N



## Enforcement and Compliance Summary ⚠️

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs in NC (Noncompliance) (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
RCRA	-	--	No Violation	0	0	--	-	-	-	--

## Regulatory Information

Clean Air Act (CAA): No Information

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active (H ) SQG (TXR000084064)

Safe Drinking Water Act (SDWA): No Information

## Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No Information

Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information

## Facility/System Characteristics

### Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110070207294					N	30.0046	-94.18593
RCR	RCRA	TXR000084064	SQG	Active (H )			N		

### Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110070207294	EXXONMOBIL PIPELINE BEAUMONT OFFICE	6810 S MAJOR DR, BEAUMONT, TX 77705
RCR	RCRA	TXR000084064	EXXONMOBIL PIPELINE BEAUMONT OFFICE	6810 S MAJOR DR, BEAUMONT, TX 77705-7206

### Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Desc
No data records returned			

### Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
RCR	TXR000084064	48691	Pipeline Transportation of Refined Petroleum Products

### Facility Tribe Information

Reservation Name	Tribe Name	EPA Tribal ID	Distance to Tribe (miles)
No data records returned			

## Enforcement and Compliance

### Compliance Monitoring History (5 years)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
No data records returned						

Entries in italics are not considered inspections in official counts.

## Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Description	Current As Of	Qtrs in NC (Noncompliance) (of 12)
RCRA	TXR000084064	No		06/16/2018	0

## Three Year Compliance Status by Quarter

Statute	Program Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
RCRA (Source ID: TXR000084064)		07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18
RCRA	Facility-Level Status												

## Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
No data records returned					

## Formal Enforcement Actions (5 Years)

Statute	System	Law/Section	Source ID	Action Type	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
No data records returned														

## Environmental Conditions

### Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow)/Outfalls	12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database))	WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database))	State Waterbody Name (ICIS (Integrated Compliance Information System))	Impaired Waters	Impaired Class	Causes of Impairment(s) by Watershed with	ESA (Endangered Species Act)-listed Aquatic Species?
No data records returned									

### Waterbody Designated Uses

Reach Code	Waterbody Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
No data records returned							

### Air Quality

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)

COMPLIANCE TYPE	COMPLIANCE	APPLICABLE COMPLIANCE STANDARD
No	Ozone	
No	Lead	
No	Particulate Matter	
No	Sulfur Dioxide	

## Pollutants

### Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site i

TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Releases
No data records returned								

### Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year i

Chemical Name
No data records returned

## Demographic Profile

### Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

Radius of Area:	3	Land Area:	97%	Households in Area:	1,318
Center Latitude:	30.0046	Water Area:	3%	Housing Units in Area:	1,462
Center Longitude:	-94.18593	Population Density:	124/sq.mi.	Households on Public Assistance:	32
Total Persons:	3,451	Percent Minority:	54%	Persons Below Poverty Level:	645

Race Breakdown	Persons (%)	Age Breakdown	Persons (%)
White:	1,748 (51%)	Child 5 years and younger:	201 (6%)
African-American:	1,207 (35%)	Minors 17 years and younger:	820 (24%)

Race/Ethnicity	Persons (%)	Age Breakdown	Persons (%)
Hispanic-Origin:	320 (9%)	Adults 18 years and older:	2,632 (76%)
Asian/Pacific Islander:	279 (8%)	Seniors 65 years and older:	421 (12%)
American Indian:	6 (0%)		
Other/Multiracial:	211 (6%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown	Households (%)
Less than 9th Grade:	209 (9.21%)	Less than \$15,000:	90 (7.5%)
9th through 12th Grade:	150 (6.61%)	\$15,000 - \$25,000:	99 (8.25%)
High School Diploma:	457 (20.14%)	\$25,000 - \$50,000:	260 (21.67%)
Some College/2-yr:	752 (33.14%)	\$50,000 - \$75,000:	206 (17.17%)
B.S./B.A. or More:	701 (30.89%)	Greater than \$75,000:	545 (45.42%)



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### RCRAInfo Links

 RCRAInfo



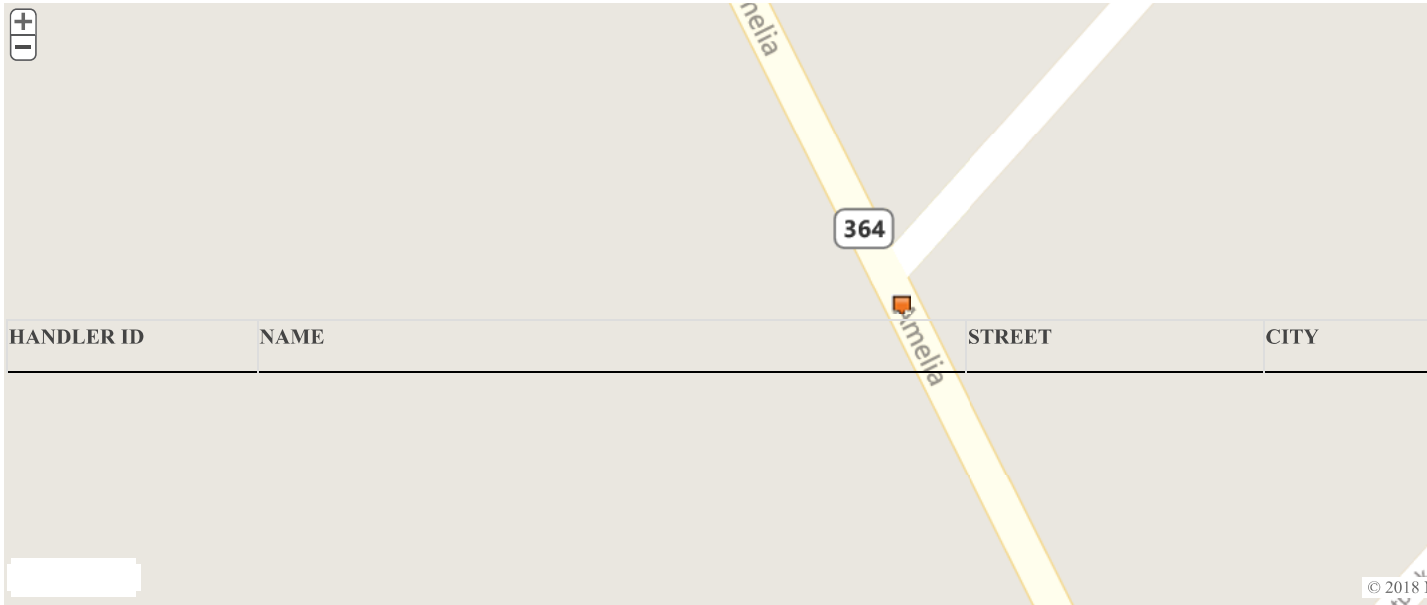
**Consolidated facility information (from multiple EPA systems) was searched to select facilities**

[<< Return](#)

**Search Parameters:** EPA Facility ID: Beginning With: 110070207294

Results are based on data extracted on MAY-14-2018





HANDLER ID	NAME	STREET	CITY	COUNTY	STATE	ZIP CODE
------------	------	--------	------	--------	-------	----------

Showing 1 to 1 of 1 entries

Show  entries

Search:

[First](#) [Previous](#) [1](#) [Next](#) [Last](#)

HANDLER ID	NAME	STREET	CITY	COUNTY	STATE	ZIP CODE	LATITUDE/LONGITUDE
<a href="#">TXR000084064</a>	EXXONMOBIL PIPELINE BEAUMONT OFFICE	6810 S MAJOR DR	BEAUMONT	JEFFERSON	TX	77705-7206	30.0046/-94.18593

Showing 1 to 1 of 1 entries

Show  entries

Search:

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**Total Number of Facilities Retrieved: 1**



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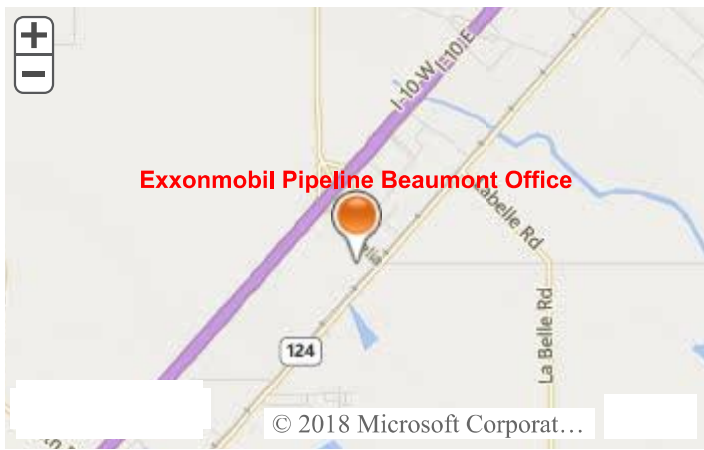
 RCRAInfo



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### RCRAInfo Facility Information

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<p><b>EXXONMOBIL PIPELINE BEAUMONT OFFICE</b>          Handler ID: TXR000084064          6810 S MAJOR DR          BEAUMONT, TX 77705-7206</p> <p><b>County Name:</b> JEFFERSON</p> <p><b>Latitude:</b> 30.0046  <b>Longitude:</b> -94.18593</p> <p><b>Hazardous Waste Generator:</b> Small          Quantity Generator</p> <p><b>Owner Name:</b> EXXONMOBIL PIPELINE          COMPANY</p>	 <p><i>*You can navigate within the map with your mouse.</i></p>
---	---

**No BIENNIAL REPORT data is available for the facility listed above.**

### LIST OF FACILITY CONTACTS

<u>NAME</u>	<u>STREET</u>	<u>CITY</u>	<u>STATE</u>	<u>ZIP CODE</u>	<u>PHONE</u>	<u>TYPE OF CONTACT</u>
WENDY FREGIA	6810 S MAJOR DR	BEAUMONT	TX	77705-7206	409-842-7983	Public
WENDY FREGIA	6810 S MAJOR DR	BEAUMONT	TX	77705-7206	409-842-7983	Permit

### HANDLER / FACILITY CLASSIFICATION

**Unspecified Universe for the facility listed above.**

<u>HANDLER TYPE</u>
---------------------

Small Quantity Generator
--------------------------

**No PROCESS INFORMATION is available for the facility listed above.**

### LIST OF NAICS CODES AND DESCRIPTIONS

<u>NAICS CODE</u>	<u>NAICS DESCRIPTION</u>
-------------------	--------------------------

48691

PIPELINE TRANSPORTATION OF REFINED PETROLEUM PRODUCTS

**LIST OF WASTE CODES AND DESCRIPTIONS**

<u>WASTE CODE</u>	<u>WASTE DESCRIPTION</u>
D027	1,4-DICHLOROBENZENE
D039	TETRACHLOROETHYLENE
D040	TRICHLORETHYLENE

[Go To Top Of The Page](#)**Total Number of Facilities Retrieved: 1**

# Central Registry Query - Regulated Entity Information

## Regulated Entity Information

**RN Number:** RN103196432

**Name:** BAKER OIL TOOLS

**Primary Business:** No primary business description on file.

**Street Address:** 6810 S MAJOR DR, BEAUMONT TX 77705 7206

**County:** JEFFERSON

**Nearest City:** BEAUMONT

**State:** TX

**Near ZIP Code:** 77705

**Physical Location:** @ 500' S OF I-10 AT MAJOR DR

## Affiliated Customers - Current

Your Search Returned **4** Current Affiliation Records ( [View Affiliation History](#) )

*The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.*

### 1-4 of 4 Records

CN Number ▲	Customer Name	Customer Role(s)	Details
<a href="#">CN600125710</a>	EXXONMOBIL PIPELINE COMPANY	OWNER OPERATOR	
<a href="#">CN600290134</a>	BAKER HUGHES OILFIELD OPERATIONS LLC	OWNER OPERATOR	
<a href="#">CN601720188</a>	BAKER HUGHES INCORPORATED	N/A	
<a href="#">CN602855991</a>	SMITH, MARY ANN	OWNER	

## Industry Type Codes

Code	Classification	Name
486910	NAICS	Pipeline Transportation of Refined Petroleum Products
1389	SIC	Oil and Gas Field Services
4612	SIC	Crude Petroleum Pipelines

## Permits, Registrations, or Other Authorizations

There are a total of **6** programs and IDs for this regulated entity. Click on a column name to change the sort order.

### 1-6 of 6 Records

Program ▲	ID Type	ID Number	ID Status
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXR000084064	ACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	<a href="#">96621</a>	ACTIVE

PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	49019	INACTIVE
PETROLEUM STORAGE TANK STAGE II			
STORMWATER	PERMIT	TXR05M328	CANCELLED
STORMWATER	PERMIT	TXRNER644	CANCELLED

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## Central Registry

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Detail of: **Industrial and Hazardous Waste Solid Waste Registration 96621**

For: **EXXONMOBIL PIPELINE BEAUMONT OFFICE (RN103196432)**

6810 S MAJOR DR, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **ExxonMobil Pipeline Company (CN600125710)** [View 'Issued To' History](#)

**OWNER OPERATOR** Since 01/27/2017 [View Compliance History](#)

Mailing Address: 6810 S MAJOR DR BEAUMONT, TX 77705 -7206

---

### Related Information:

#### [Solid Waste Registration Information](#)

There is no information related to this Solid Waste Registration in the following categories:

- Commissioners' Actions**
- Correspondence Tracking**
- Effective Enforcement Orders**
- Criminal Convictions**
- Proposed Enforcement Orders**
- Complaints**
- Discharges**
- Emergency Response Events**
- Emission Events**
- Fish Kills**
- Other Incidents**
- Investigations**
- Periodic Reports**

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## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 96621**

For: **EXXONMOBIL PIPELINE BEAUMONT OFFICE (RN103196432)**

6810 S MAJOR DR, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **ExxonMobil Pipeline Company (CN600125710)** [View 'Issued To' History](#)

**OWNER OPERATOR** Since 01/27/2017 [View Compliance History](#)

Mailing Address: 6810 S MAJOR DR BEAUMONT, TX 77705 -7206

### Facility Information

**Registration Number:** 96621

**Status:** Active

**Site Name:** EXXONMOBIL PIPELINE BEAUMONT OFFICE

**Company Name:** ExxonMobil Pipeline Company

**Site Street Address:** 6810 S MAJOR DR, BEAUMONT, TX, 77705

**Site Location:**

**County:** JEFFERSON

**EPA Number:** TXR000084064

**Registration Type:** Generator

**Generator Type:** Industrial

**SIC Code:**

**NAICS Code:** 486910 Pipeline Transportation of Refined Petroleum

Produ

View Annual Waste Summary not available

View Waste Receipt Report   **Waste Receipt Report not available**

[View Waste Management Units](#)

[View Waste](#)

## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 96621**

For: **EXXONMOBIL PIPELINE BEAUMONT OFFICE (RN103196432)**

6810 S MAJOR DR, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **ExxonMobil Pipeline Company (CN600125710)** [View 'Issued To' History](#)

**OWNER OPERATOR** Since 01/27/2017 [View Compliance History](#)

Mailing Address: 6810 S MAJOR DR BEAUMONT, TX 77705 -7206

[BACK TO:](#)

### Facility Information

#### IHW Waste Management Units

Sequence Number	Description	Unit Type	Status
001	CONTAINER STORAGE AREA	Container storage area	ACTIVE

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## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 96621**

For: **EXXONMOBIL PIPELINE BEAUMONT OFFICE (RN103196432)**

6810 S MAJOR DR, BEAUMONT

Solid Waste **ACTIVE**

Registration Status:

Held by: **ExxonMobil Pipeline Company (CN600125710)** [View 'Issued To' History](#)

**OWNER OPERATOR** Since 01/27/2017 [View Compliance History](#)

Mailing Address: 6810 S MAJOR DR BEAUMONT, TX 77705 -7206

[BACK TO:](#)

### Facility Information

#### IHW Waste

Texas Waste Code	Waste Description
<a href="#">0001203H</a>	DE GREASER SOLUTION

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 Statewide Links: Texas.gov | Texas Homeland Security | TRAIL Statewide Archive | Texas Veterans Portal

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0000-0000-0003-4578

**Document Control Sheet**

Box ID	5326
Control Sheet ID	0000-0000-0003-4578
Item Barcode	100856010

IHW 3/96621/02017020 Initial

IHW 96621 CO  
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### Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400).

#### Part I. General Registration Information

##### Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Update	
2. Solid Waste Registration Number: <u>96621</u>	3. EPA Identification Number: <u>TXR000084064</u>
4. Customer Reference Number: CN <u>600125710</u> 600125710	5. Regulated Entity Number: RN <u>10396432</u>

##### Section B. Company Information

1. Company Name (as listed with the Secretary of State): <u>ExxonMobil Pipeline Company</u>	
2. Site Name: <u>Beaumont Office</u>	
3. Registration Type (check all that apply): <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Receiver <input type="checkbox"/> Transporter <input type="checkbox"/> Recycler	
4. Site Contact Information:	
<u>Wendy Fregia, Field Regulatory Specialist</u> (First Name, Last Name, Title)	
Telephone Number: <u>(409) 842-7983</u> Fax Number: ( )	
Email: <u>wendy.fregia@exxonmobil.com</u>	
5. Billing Contact Information (can be an individual or organization name):	
<u>Wendy Fregia, Field Regulatory Specialist</u>	
(First Name, Last Name, Title OR Company Name) <i>WFS</i>	
Mailing Address: <u>6810 S. Major <del>Drive</del> <sup>Dr</sup> Beaumont, Texas 77705 - 7206</u>	
(City)	(State)
(Zip Code)	
Telephone Number: <u>(409) 842-7983</u> Fax Number: ( )	
Email: <u>wendy.fregia@exxonmobil.com</u>	
6. Waste Handler Status (check all that apply):	
<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Permitted TSD <input type="checkbox"/> Interim TSD <input type="checkbox"/> Recycler	

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PDN 2-13-17  
1073971 *SE*

## Notification for Hazardous or Industrial Waste Management

<b>Section C. Generator Information</b>		
If your facility does not fit the definition of a "Generator" skip to Section D		
1. Generator Type (check all that apply): <input checked="" type="checkbox"/> Industrial <input type="checkbox"/> Non-industrial <input type="checkbox"/> Railroad Commission		
2. Hazardous Waste Generation Status (check one):	<input type="checkbox"/> Large Quantity Generator (LQG)	❖ 2,200 pounds (1,000 kilograms) or more of hazardous waste <b>and/or</b> ❖ 2.2 pounds (1 kilogram) or more of acutely hazardous waste
	<input checked="" type="checkbox"/> Small Quantity Generator (SQG)	❖ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste <b>and</b> ❖ less than 2.2 pounds (1 kilogram) of acutely hazardous waste
	<input type="checkbox"/> Industrial Conditionally Exempt Small Quantity Generator (CESQG)	❖ 220 pounds (100 kilograms) or less of hazardous waste <b>and</b> ❖ less than 2.2 pounds (1 kilogram) of acutely hazardous waste <b>and</b> ❖ 220 pounds (100 kilograms) or more of industrial Class 1 waste
	<input type="checkbox"/> Universal Waste Only	❖ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site

<b>Section D. Receiver Information</b>
If your facility does not fit the definition of a "Receiver" skip to Section E
1. Facility Category (check one): <input type="checkbox"/> Commercial <input type="checkbox"/> Captive <input type="checkbox"/> Captured
2. Class of Waste Received for treatment, storage or disposal (check all that apply): <input type="checkbox"/> Hazardous <input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3
3. If you receive waste from off-site and recycle it, see TCEQ Form 0524 "Notification Form for Receiving and Recycling Hazardous or Industrial Waste".


<b>Section E. Transporter Information</b>		
If your facility does not fit the definition of a "Transporter" skip to Section F		
*To Transport hazardous waste you must have an EPA identification number. See EPA RCRA Subtitle C Site Identification Form (EPA Form 8700-12).		
1. Carrier Classification (answer "yes" or "no" to each question):		
a. Do you transport for hire?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b. Do you transport your own waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

c. Is this site a transfer facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Types of waste transported (check all that apply):		
<input type="checkbox"/> Hazardous*	<input type="checkbox"/> Class 1	<input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3

## Notification for Hazardous or Industrial Waste Management

### Section F. Certification of Company Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Timothy S. Martin	( 832 ) 624-7883
Printed Preparer's Name Number	Telephone
	1-30-12
Preparer's Signature	Date

#### Mail all completed registration forms

(i.e., Notification for Hazardous or Industrial Waste Management, TCEQ 00002; TCEQ Core Data Form, TCEQ 10400; EPA RCRA Subtitle C Site Identification Form, EPA Form 8700-12)

**Texas Commission on Environmental Quality  
Permitting and Registration Support Division  
Registration and Reporting Section, MC 129  
PO Box 13087  
Austin, TX 78711-3087**

**If you have questions on how to fill out this form or about the Industrial and Hazardous Waste Program, please contact us at 512/239-6413.** Individuals are entitled to request and review their personal information the agency gathers on its forms. They may also have any errors in their information corrected. Administrative changes must be made on the TCEQ Core Data Form (TCEQ 10400). To review such information, contact us at 512/239-3282.

## Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400). You may copy this section as needed for each waste stream at your site.

### Part II. Waste Stream Notification

#### Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Update	
2. Solid Waste Registration Number: <u>96621</u>	3. EPA Identification Number: <u>TKR000084064</u>
4. Customer Reference Number: <u>CN 600125710</u>	5. Regulated Entity Number: <u>RN 103196432</u>
6. Company Name (as listed with the Secretary of State): <u>ExxonMobil Pipeline Company</u>	
7. Site Name: <u>Beaumont Office Exxon Mobil Pipeline Company - Beaumont office</u>	

#### Section B. Waste Stream Information

1. Texas Waste Code: <u>0001</u> Sequence Number	<u>203</u> Texas Form Code (See Appendix B)	<u>H</u> <u>1</u> <u>2</u> <u>3</u> Class Code (Circle Class Code)
---	---	--

2. Waste Description and Generating Process:  
Degreaser Solution

3. Date of Generation: 10 / 16 / 2016  
Month Day Year

4. Origin Code (check one):	<input checked="" type="checkbox"/> 1. The waste was generated on-site from a product process or service activity.
	<input type="checkbox"/> 2. The waste resulted from a spill clean-up, equipment decommissioning, or emergency removal by company.
	<input type="checkbox"/> 3. The waste was derived from the on-site management of a non-hazardous waste.
	<input type="checkbox"/> 4. The waste was received from off-site and was not recycled or treated on-site.
	<input type="checkbox"/> 5. The waste was residual from the on-site treatment, disposal or recycling of previously existing hazardous waste.
	<input type="checkbox"/> 6. The waste was from a state, federal, or locally funded cleanup.
	<input type="checkbox"/> 7. The waste was from a corrective action or closure.

5. New Chemical Substance:  Yes  No  
If you check "yes" and the waste is Class 2 or Class 3, attach copies of all information, documentation and rationale used to classify the waste.

6. Waste Management Location (check all that apply):  On  Off  
Provide the 3-digit waste management unit sequence number for any **ON-SITE** waste management units where this waste is treated, stored or disposed. If the waste management unit is new, leave blank, and include waste stream in Part III Waste Management Unit Notification, question 9.

7. If this waste is recycled, see TCEQ Form 0525 "Generator Notification Form for Recycling Hazardous or Industrial Waste".

Please provide the 8-digit Texas Waste Code from Item 1 of Section B: 0001203H



IHW \_\_\_\_\_

CO

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**If this waste is non-hazardous, skip Questions 8-13 and go to Section C. Certification of Waste Stream Information**

8. EPA Hazardous Waste Numbers (EPA Codes):

D027, D039, D040

9. North American Industry Classification System (NAICS) 6-digit Code: 48611010. Source Code (See Appendix C): G 1911. Mixed Radioactive Waste:  Yes  No12. System Type Code (See Appendix D): H

\*Only fill out System Type Code if you selected Origin Code 5 from the previous page.

13. EPA Form Code (See Appendix E): W 219**Section C. Certification of Waste Stream Information**


I certify that the information submitted herein is complete and accurate to the best of my knowledge.

Timothy S. Martin

832-624-7883

Printed Preparer's Name

Telephone Number



1-30-17

Preparer's Name

Date

## Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400). You may copy this section as needed for each waste management unit at your site.

### Part III. Waste Management Unit Notification

#### Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one):  Initial  Update

2. Solid Waste Registration Number: 96621

3. EPA Identification Number: TXR00008464

4. Customer Reference Number: CN 600575710

5. Regulated Entity Number: RN 103196432

6. Company Name (as listed with the Secretary of State):

7. Site Name:

#### Section B. Waste Management Unit Information

1. Unit Sequence Number: 001

2. Unit Type Code: 14  
(See Appendix F)

3. Capacity:

4. Unit Description: Cotainer Storage Area

5. Is this unit permitted?  Yes  No

5a. IHW Permit No.

5b. UIC Permit No.

6. Unit Registration Status (check one):  Active  Inactive  Not Yet Built  Under Construction

7. Unit Regulatory Status (\*Check one):

Non-hazardous Regulated

Permitted Non-hazardous Industrial Unit

UIC Permitted

UIC Registration

RCRA Permitted Unit

RCRA Permit Exempt <90 Day Storage

RCRA Permit Exempt - Accumulation Time

RCRA Permit Exempt - Recycling Unit per §335.24

RCRA Permit Exemption - Totally Endosed Treatment

RCRA Permit Exempt - Wastewater Treatment Unit

8. System Type Code (See Appendix D): H 141 H H H

9. Type of off-site waste managed in unit (check all that apply):

Does Not Apply  Hazardous  Industrial Class 1  Industrial Class 2  Industrial Class 3

10. List the waste streams (Texas Waste Code) generated on-site and managed in this unit:

0001203H  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### Section C. Certification of Waste Management Unit Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Timothy S. Martin

Printed Preparer's Name

Telephone Number

832-624-7883

Preparer's Signature

1-30-17

Date



# TCEQ Core Data Form

TCEQ Use Only  
**96621**

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input type="checkbox"/> Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in <b>Central Registry**</b>	3. Regulated Entity Reference Number (if issued)
CN 600125710		RN 163196432

## SECTION II: Customer Information

4. General Customer Information	5. Effective Date for Customer Information Updates (mm/dd/yyyy)	1/27/2017	
<input type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)			
<b>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</b>			
6. Customer Legal Name (If an individual, print last name first: e.g.: Doe, John)		If new Customer, enter previous Customer below:	
ExxonMobil Pipeline Company			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
0002138406	17413945126	741394512	00-793-1777
11. Type of Customer:	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Other:	
12. Number of Employees		13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
14. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check one of the following:			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> Voluntary Cleanup Applicant <input type="checkbox"/> Other:			
15. Mailing Address:	6810 S. Major Drive <sup>Dr</sup>		
City	Beaumont	State	TX
ZIP	77705	ZIP + 4	7206 <sup>usps Ac</sup>
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
		wendy.fregia@exxonmobil.com	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
( 409 ) 842 - 7983		( 409 ) 842 - 1090	

## SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)	
<input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information	
<b>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</b>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
ExxonMobil Pipeline Company- Beaumont Office	

23. Street Address of the Regulated Entity: (No PO Boxes)	6810 S. Major Drive <i>Dr usps se</i>							
	City	Beaumont	State	TX	ZIP	77705	ZIP + 4	7206 <i>usps se</i>
24. County	Jefferson							

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:	I-10 East to South Major Drive							
26. Nearest City	Beaumont				State	TX	Nearest ZIP Code	77705
27. Latitude (N) In Decimal:	30°0'.14.33"N			28. Longitude (W) In Decimal:	94°11'.9"W			
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
29. Primary SIC Code (4 digits)	4612	30. Secondary SIC Code (4 digits)	4613	31. Primary NAICS Code (5 or 6 digits)	486910 <i>usps se</i>	32. Secondary NAICS Code (5 or 6 digits)	486110	
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)								
Maintenance / Operations								
34. Mailing Address:	6810 S. Major Drive <i>Dr usps se</i>							
	City	Beaumont	State	TX	ZIP	77705	ZIP + 4	7206 <i>usps se</i>
35. E-Mail Address:	wendy.fregia@exxonmobil.com							
36. Telephone Number			37. Extension or Code		38. Fax Number (if applicable)			
( 409 ) 842 - 7983					( 409 ) 842 - 1090			

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Timothy S. Martin			41. Title:	Waste Advisor
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address		
( 832 ) 624 - 7883		( 832 ) 648 - 6335	timothy.s.martin@exxonmobil.com		

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	ExxonMobil Pipeline Company	Job Title:	Chemicals Area Manager
Name (In Print):	Jackson L. Simonich	Phone:	( 281 ) 922 - 2055
Signature:	<i>Jackson L. Simonich</i>	Date:	

ExxonMobil Pipeline Company  
2777 Springwoods Village Parkway  
Energy 3-5A.616  
Spring, TX 77389  
281-922-2002 Office  
571-266-9165 Cell  
832-648-6336 Facsimile

A. K. (Alexandra) Krupnik  
Environmental Compliance Supervisor

**ExxonMobil**

January 30, 2017

UPS Overnight Mail – 1Z78V191N93698436

Texas Commission on Environmental Quality  
Permitting and Remediation Support Division  
Registration and Reporting Section, MC 129  
12100 Park 35 Circle  
Austin, Texas 78753

Re: Request for EPA Hazardous Waste ID Number  
ExxonMobil Beaumont Office

To Whom It May Concern:

Attached please find EPA Form 8700-12, TCEQ Form 10400 and TCEQ Form 00002 that requests an EPA RCRA identification number for our ExxonMobil Pipeline Company office in Beaumont, Texas.

If you have any questions regarding this submittal, please contact Tim Martin at (832) 624-7883.

Sincerely,



Alexandra K. Krupnik  
Environmental Compliance Supervisor

Attachments

EPA 8700

TCEQ - 10400

TCEQ 00002



**United States Environmental Protection Agency  
RCRA SUBTITLE C SITE IDENTIFICATION FORM**

<p><b>SEND COMPLETED FORM TO:</b> The Appropriate State or Regional Office.</p>		
<p><b>1. Reason for Submittal</b></p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p><b>Reason for Submittal:</b></p> <p><input checked="" type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of &gt;1,000 kg of hazardous waste, &gt;1 kg of acute hazardous waste, or &gt;100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p>	
<p><b>2. Site EPA ID Number</b></p>	<p>EPA ID Number <u>TXR1001010841064</u></p>	
<p><b>3. Site Name</b></p>	<p>Name: ExxonMobil Pipeline - Beaumont Office</p>	
<p><b>4. Site Location Information</b></p>	<p>Street Address: 6810 S. Major Drive <u>DN</u></p> <p>City, Town, or Village: Beaumont</p> <p>State: Texas</p> <p>Country: USA</p> <p>County: Jefferson</p> <p>Zip Code: 77705 - <u>7206</u></p>	
<p><b>5. Site Land Type</b></p>	<p><input checked="" type="checkbox"/> Private    <input type="checkbox"/> County    <input type="checkbox"/> District    <input type="checkbox"/> Federal    <input type="checkbox"/> Tribal    <input type="checkbox"/> Municipal    <input type="checkbox"/> State    <input type="checkbox"/> Other</p>	
<p><b>6. NAICS Code(s) for the Site (at least 5-digit codes)</b></p>	<p>A. <u>4</u>   <u>8</u>   <u>6</u>   <u>9</u>   <u>1</u>   <u>0</u></p> <p>B. <u>4</u>   <u>8</u>   <u>6</u>   <u>1</u>   <u>1</u>   <u>0</u></p> <p>C. _____</p> <p>D. _____</p>	
<p><b>7. Site Mailing Address</b></p>	<p>Street or P.O. Box: 6810 S. Major Drive <u>DN</u></p> <p>City, Town, or Village: Beaumont</p> <p>State: Texas</p> <p>Country: USA</p> <p>Zip Code: 77705 - <u>7206</u></p>	
<p><b>8. Site Contact Person</b></p>	<p>First Name: Wendy    MI:    Last: Fregia</p> <p>Title: Field Regulatory Specialist</p> <p>Street or P.O. Box: 6810 S. Major Drive <u>DN</u></p> <p>City, Town or Village: Beaumont</p> <p>State: Texas</p> <p>Country: USA</p> <p>Zip Code: 77705 - <u>7206</u></p> <p>Email: wendy.fregia@exxonmobil.com</p> <p>Phone: 409-842-7983    Ext.:    Fax: 409-842-1090</p>	
<p><b>9. Legal Owner and Operator of the Site</b></p>	<p>A. Name of Site's Legal Owner: ExxonMobil Pipeline Company    Date Became Owner: 10/7/09</p> <p>Owner Type: <input checked="" type="checkbox"/> Private    <input type="checkbox"/> County    <input type="checkbox"/> District    <input type="checkbox"/> Federal    <input type="checkbox"/> Tribal    <input type="checkbox"/> Municipal    <input type="checkbox"/> State    <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 22777 Springwoods Village Parkway, E3.5A.605</p> <p>City, Town, or Village: Spring    Phone: 832-624-7883</p> <p>State: Texas    Country: USA    Zip Code: 77389</p> <p>B. Name of Site's Operator: ExxonMobil Pipeline Company    Date Became Operator: 10/7/09</p> <p>Operator Type: <input checked="" type="checkbox"/> Private    <input type="checkbox"/> County    <input type="checkbox"/> District    <input type="checkbox"/> Federal    <input type="checkbox"/> Tribal    <input type="checkbox"/> Municipal    <input type="checkbox"/> State    <input type="checkbox"/> Other</p>	

**10. Type of Regulated Waste Activity (at your site)**  
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities; Complete all parts 1-10.**

- Y  N  **1. Generator of Hazardous Waste**  
 If "Yes," mark only one of the following – a, b, or c.
- a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.
- b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.
- c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.
- If "Yes" above, indicate other generator activities in 2-10.

- Y  N  **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.
- Y  N  **3. United States Importer of Hazardous Waste**
- Y  N  **4. Mixed Waste (hazardous and radioactive) Generator**

- Y  N  **5. Transporter of Hazardous Waste**  
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y  N  **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.
- Y  N  **7. Recycler of Hazardous Waste**
- Y  N  **8. Exempt Boiler and/or Industrial Furnace**  
 If "Yes," mark all that apply.
- a. Small Quantity On-site Burner Exemption
- b. Smelting, Melting, and Refining Furnace Exemption
- Y  N  **9. Underground Injection Control**
- Y  N  **10. Receives Hazardous Waste from Off-site**

**B. Universal Waste Activities; Complete all parts 1-2.**

- Y  N  **1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.
- a. Batteries
- b. Pesticides
- c. Mercury containing equipment
- d. Lamps
- e. Other (specify) \_\_\_\_\_
- f. Other (specify) \_\_\_\_\_
- g. Other (specify) \_\_\_\_\_
- Y  N  **2. Destination Facility for Universal Waste**  
 Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities; Complete all parts 1-4.**

- Y  N  **1. Used Oil Transporter**  
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y  N  **2. Used Oil Processor and/or Re-refiner**  
 If "Yes," mark all that apply.
- a. Processor
- b. Re-refiner
- Y  N  **3. Off-Specification Used Oil Burner**
- Y  N  **4. Used Oil Fuel Marketer**  
 If "Yes," mark all that apply.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications







Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## Texas Commission on Environmental Quality

*Protecting Texas by Reducing and Preventing Pollution*

February 13, 2017

WENDY FREGIA  
EXXONMOBIL PIPELINE COMPANY  
6810 S MAJOR DR  
BEAUMONT, TX 77705-7206

Re: Solid Waste Registration Number (SWR):96621 / EPA ID: TXR000084064  
Customer Number: CN600125710 / Regulated Entity Number: RN103196432  
Site Name: EXXONMOBIL PIPELINE COMPANY- BEAUMONT OFFICE  
Site Location: 6810 S MAJOR DR , BEAUMONT, TX 77705-7206

Dear WENDY FREGIA:

Thank you for submitting information on your facility's industrial and/or hazardous waste activity. Your facility has been assigned the above-referenced registration numbers.

In an effort to conserve resources, the Notice of Registration (NOR) for your facility is available via the web. Instructions on how to view and print your NOR are on the back of this letter.

Please take a few moments to verify ALL information and determine whether the NOR accurately reflects your facility's activities.

If you would like a paper copy of your NOR you can either print it from our web site or contact our Central File Room to request a copy (512-239-2900 or [CFRREQ@tceq.state.tx.us](mailto:CFRREQ@tceq.state.tx.us)).

You can update, correct, and add information to your NOR through our web application known as STEERS (State of Texas Environmental Electronic Reporting System). Submitting the Annual Waste Summary Report through STEERS extends the reporting deadline from January 25th to March 1st. If you are not currently using our free STEERS system, please consider visiting the site using the following URL. <https://www6.tceq.state.tx.us/steers/>

If you have any questions or concerns regarding your NOR or need help signing up for STEERS, please do not hesitate to contact a member of the Industrial and Hazardous Waste Registration and Reporting Program at (512) 239-6413 or [WASTEVAL@tceq.state.tx.us](mailto:WASTEVAL@tceq.state.tx.us).

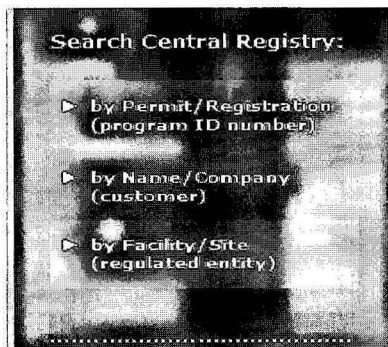
Sincerely,

A handwritten signature in black ink, appearing to read "Edward Minter".

Edward Minter, Team Lead  
IHW/MSW Registration and Reporting Team  
Registration and Reporting Section

To view your Notice of Registration (NOR):

1. From TCEQ's home page (www.tceq.state.tx.us) click "Search Central Registry by Permit/Registration (program ID number)". (Left hand side of the screen.)

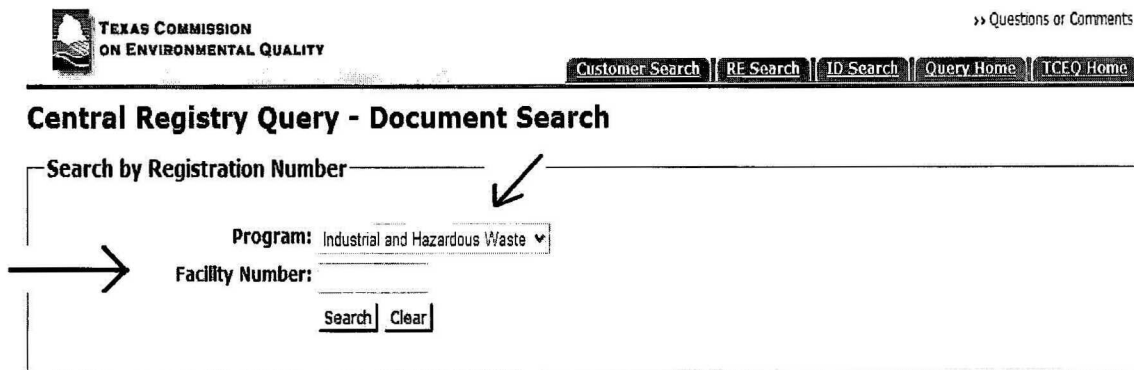


2. Select "Document Search" from the tabs at the top of the page. (The most current copy of your NOR must be viewed from "Document Search". While there are alternate tabs for viewing information on file with the Agency this view will be updated with the most recently updated version of your NOR.)



### Central Registry Query - Additional ID Search

3. Select "Industrial and Hazardous Waste" for the Program. Enter your 5 digit Registration Number in the "Facility Number" field. Click "Search".



4. Click on "View Registration". A copy of your NOR will be available in PDF format (for viewing and printing).

Central Registry Query - IHW Notice of Registration List			
Facility Number	Facility Name	Address	Registration
12345	Smith Transport	8501 Transport Drive	<a href="#">View Registration</a>

A black arrow points from the bottom right towards the "View Registration" link in the table.

[Customer Search](#)[RE Search](#)[ID Search](#)[Document Search](#)[Search Results](#)[TCEQ Home](#)[Query Home](#)

## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN103196432**Name:** BAKER OIL TOOLS**Primary Business:** No primary business description on file.**Street Address:** 6810 S MAJOR DR, BEAUMONT TX 77705 7206**County:** JEFFERSON**Nearest City:** BEAUMONT**State:** TX**Near ZIP Code:** 77705**Physical Location:** @ 500' S OF I-10 AT MAJOR DR

### Affiliated Customers - Current

Your Search Returned **4** Current Affiliation Records ( [View Affiliation History](#) )

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

#### 1-4 of 4 Records

CN Number ▲	Customer Name	Customer Role(s)	Details
<a href="#">CN600125710</a>	EXXONMOBIL PIPELINE COMPANY	OWNER OPERATOR	
<a href="#">CN600290134</a>	BAKER HUGHES OILFIELD OPERATIONS LLC	OWNER OPERATOR	
<a href="#">CN601720188</a>	BAKER HUGHES INCORPORATED	N/A	
<a href="#">CN602855991</a>	SMITH, MARY ANN	OWNER	

### Industry Type Codes

Code	Classification	Name
486910	NAICS	Pipeline Transportation of Refined Petroleum Products
1389	SIC	Oil and Gas Field Services
4612	SIC	Crude Petroleum Pipelines

### Permits, Registrations, or Other Authorizations

There are a total of **6** programs and IDs for this regulated entity. Click on a column name to change the sort order.

#### 1-6 of 6 Records

Program ▲	ID Type	ID Number	ID Status
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXR000084064	ACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	<a href="#">96621</a>	ACTIVE

PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	49019	INACTIVE
PETROLEUM STORAGE TANK STAGE II			
STORMWATER	PERMIT	TXR05M328	CANCELLED
STORMWATER	PERMIT	TXRNER644	CANCELLED

---

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[Statewide Links: Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

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[Customer Search](#)[RE Search](#)[ID Search](#)[Document Search](#)[Search Results](#)[TCEQ Home](#)[Query Home](#)

## Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Petroleum Storage Tank Registration 49019**

For: **BAKER OIL TOOLS (RN103196432)**

6810 S MAJOR DR, BEAUMONT

Registration Status: **INACTIVE**

Held by: **BAKER HUGHES OILFIELD OPERATIONS INC (CN600290134)** [View 'Issued To' History](#)

**OWNER** Since 03/24/1992 [View Compliance History](#)

Now Known As: **Baker Hughes Oilfield Operations LLC**

Mailing Address: 9100 EMMOTT RD HOUSTON, TX 77040 -3514

[View Earlier Holders](#)

---

### Related Information:

#### [Registration Information](#)

There is no information related to this Registration in the following categories:

**Commissioners' Actions**

**Correspondence Tracking**

**Effective Enforcement Orders**

**Criminal Convictions**

**Proposed Enforcement Orders**

**Complaints**

**Discharges**

**Emergency Response Events**

**Emission Events**

**Fish Kills**

**Other Incidents**

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[Statewide Links: Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

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Table 1. Underground Storage Tank Summary

Tank	Capacity (Gallons)	Date Installed	Status	Substance Stored
1	3000	01/01/1984	Removed from Ground (08/31/1987)	A:Empty

Table 2. Tank Details

Tank	Design & Materials	Corrosion Protection	Release Detection	Spill Containment and Overfill Prevention	Installation Contractor	Installer	Test Result
1	( Steel )						

Table 3. Compartment Details

Tank	Compartment	Capacity (gallons)	Principal Substance	Other Substance	Release Detection	Spill Containment and Overfill Prevention
1	A	3000	Empty			

Table 4. Piping Systems

Tank	Type of Piping	Piping Material	Design and External Containment	Connectors and valves	Corrosion Protection	Release Detection
1		Steel				

5. Vapor Recovery Systems

Tank	Type of Stage 1	Date Installed	Type of Stage 2	Date Installed
1	Not Reported			

# WST PST

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*Identification No:* 1st ID: **0049019** 2nd ID:

*File Type:* **CORRESPONDENCE**

*Vol No:* **001**

*Inclusive Dates:* **1989 - 1989**

*IBC:* **00097014**

*Media Code/Format:*

- Microfiche  
 Roll Microfilm



# NOTICE OF DOCUMENT QUALITY

TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

THE QUALITY OF THE FOLLOWING DOCUMENT(S) IS SUCH  
THAT ALL OR PORTIONS OF THE MICROFILMED IMAGE  
MAY BE DIFFICULT TO READ OR ILLEGIBLE

Some reason for poor quality:

There are multiple densities per page, different types of ink, faded documents  
and some documents are different colors. Many of the photographs are of poor  
quality.

# Notification for Undergound Storage Tanks

FOR TANKS IN TX

RETURN COMPLETED FORM TO

Underground Storage Tank Program  
Texas Water Commission  
P.O. Box 13087  
Austin, TX 78711

RECEIVED  
SEP 05 1989

STATE USE ONLY  
I.D. Number 049019  
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

**Who Must Notify?** Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

**What Tanks Are Included?** Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

**What Tanks Are Excluded?** Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes.
2. tanks used for storing heating oil for consumptive use on the premises where stored.
3. septic tanks.

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, manworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

**What Substances Are Covered?** The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 301 (34) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

**Where To Notify?** Completed notification forms should be sent to the address given at the top of this page.

**When To Notify?** 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

**Penalties:** Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

## INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

-0-

### I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)  
TRI-STATE OIL TOOLS, INC. 25620

Street Address  
2701 Village Lane

County Parish  
Bossier

City State ZIP Code  
Bossier City, Louisiana 71112

Area Code Phone Number  
318 747-3700

#### Type of Owner (Mark all that apply)

- Current  State or Local Gov't  Private or Corporate  
 Former  Federal Gov't (GSA facility I.D. no.)  Ownership uncertain

### II. LOCATION OF TANK(S)

(If same as Section I, mark box here  123/06)

Facility Name or Company Site Identifier, as applicable  
TRI-STATE OIL TOOLS, INC.

Street Address or State Road, as applicable  
6810 South Major Drive

County  
Jefferson

City (nearest) State ZIP Code  
Beaumont, Texas 77705

Indicate number of tanks at this location

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

### III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here ) Job Title  
Jody Murphy Employee Services Supervisor

Area Code Phone Number  
318 747-3700

### IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

### V. CERTIFICATION (Read and sign after completing Section VI)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative  
Jody Murphy, Employee Services Supervisor

Signature

Jody Murphy

Date Signed

August 31, 1989

CONTINUE ON REVERSE SIDE

# WST PST

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*Identification No:* 1st ID **0049019** 2nd ID:

*File Type:* **CORRESPONDENCE**

*Vol No:* **001**

*Inclusive Dates:* **2007 - 2007**

*IBC:* **379501**

**Media Code/Format:**

- Microfiche  
 Roll Microfilm

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TEXAS COMMISSION ON  
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Some reason for poor quality:

There are multiple densities per page, different types of ink, faded documents  
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quality.

**Texas Commission on Environmental Quality**  
**Investigation Report**  
**BAKER OIL TOOLS**  
**CN601720188**

**TRI-STATE OIL TOOLS INC**  
**RN102444957**

Investigation # 609356

Incident #

Investigator: GARRY TIDWELL

Site ClassificationUNDERGROUND STORAGE TANK -  
REGISTRATION

Conducted: 11/16/2007 - 11/16/2007

No Industry Code Assigned

Program(s): PETROLEUM STORAGE TANK REGISTRATION

Investigation Type: Compliance Invest File Review

Location:

Additional ID(s): 49019

Address: 6810 S MAJOR DR;  
BEAUMONT, TX 77705Activity Type: REGION 10 - BEAUMONT  
PSTRR - Record review of information submitted to the  
agencyPrincipal(s):

Role	Name
RESPONDENT	BAKER OIL TOOLS

Contact(s):

Role	Title	Name	Phone
Regulated Entity Contact	ENVIRONMENTAL MANAGER	MYNA LETLOW	(713) 466-2955 (713) 466-2650

Other Staff Member(s):

Role	Name
Supervisor	DEREK EADES
QA Reviewer	MELVIN ADDERTON
Supervisor	SUSAN KELLY

**Associated Check List**

<u>Checklist Name</u>	<u>Unit Name</u>
PST OUT OF SERVICE (OOFs) CHECKLIST	49019 PST OOFs INV

Investigation Comments:

## INTRODUCTION

On November 16, 2007, Garry Tidwell, Environmental Investigator, conducted a Petroleum Storage Tank (PST) Record Review investigation of Tri-State Oil Tools, Inc. (PST Facility ID #49019) regarding a notice of violation (NOV) letter sent to Ms. Jill Schultz, Manager of Baker Oil Tools North America Health, Safety & Environment, on December 22, 2006.

## GENERAL FACILITY AND PROCESS INFORMATION

Tri-State Oil Tools, Inc. is now owned and operated by Baker Hughes Oilfield Operations, Inc. and is located at 6810 S. Major Drive in Beaumont.

## BACKGROUND

RECEIVED  
 JAN 03 2008  
 TCEO  
 CENTRAL FILE ROOM

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address; however, no USTs or fill ports were observed at the site

Investigation: 609356

Comment Date: 11/19/2007

A review of the alleged violation and compliance documentation, received by the TCEQ, was conducted

**Recommended Corrective Action:** Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.

**Resolution:** On January 17, 2007, compliance documentation, which included an Affidavit affirming permanent removal of a UST at the facility in the mid to late 1980's, was received by the TCEQ.

Signed G. L. Liddell  
Environmental Investigator

Date 12/15/07

Signed Daryl L. Eade  
Supervisor

Date 12/20/07

**Attachments: (in order of final report submittal)**

- Enforcement Action Request (EAR)
- Letter to Facility (specify type) GC
- Investigation Report
- Sample Analysis Results
- Manifests
- NOR

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify):  
Attachment 1

## Summary of Investigation Findings

TRI-STATE OIL TOOLS INC  
6810 S MAJOR DR  
BEAUMONT, JEFFERSON COUNTY, TX 77705  
Additional ID(s): 49019

Investigation # 609356  
Investigation Date: 11/16/2007

### ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 262684

#### 30 TAC Chapter 334.7(d)(3)

**Alleged Violation:**

Investigation: 533770

Comment Date: 12/20/2006

Failure to amend registration for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition, or within 30 days of the date on which the owner or operator first became aware of the change or addition, as applicable

At the time of the investigation, the TCEQ PST Registration database indicated that the facility registration information has not been properly amended to reflect the new owner or operator, or change in owner or operator information.

Investigation: 609356

Comment Date: 11/19/2007

A review of the alleged violation and compliance documentation, received by the TCEQ, was conducted.

**Recommended Corrective Action:** Update Registration Form with requested information.

**Resolution:** On January 17, 2007, compliance documentation, which included an updated UST Registration and Self-Certification Form, was received by the TCEQ.

Track No: 262685

#### 30 TAC Chapter 334.47(a)(2)

**Alleged Violation:**

Investigation: 533770

Comment Date: 12/21/2006

Failure to permanently remove from service, no later than 60 days after the prescribed upgrade implementation date, an existing UST system for which any applicable component of the system is not brought into timely compliance with the upgrade requirements.

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address; however, no USTs or fill ports were observed at the site.

Investigation: 609356

Comment Date: 11/19/2007

A review of the alleged violation and compliance documentation, received by the TCEQ, was conducted.

**Recommended Corrective Action:** Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.

**Resolution:** On January 17, 2007, compliance documentation, which included an Affidavit affirming permanent removal of a UST at the facility in the mid to late 1980's, was received by the TCEQ.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## **Tri-State Oil Tools, Inc.**

PST Facility ID: 49019

CCEDS: 609356

11/16/2007

## **ATTACHMENT 1**

Compliance Documentation



**Health, Safety & Environmental**

Baker Oil Tools  
Myna Letlow  
9100 Emmott Road  
Houston, TX 77040  
P. O. Box 40129 (7740-0129)  
Tel: 713 466-2955  
Fax: 713 466-2650

12 January 2007

Ms. Susan Kelly  
Waste Section Work Leader  
Texas Commission on Environmental Quality  
Beaumont Region Office  
3870 Eastex Fwy.  
Beaumont, Texas 77703-1830

**RECEIVED****JAN 17 2007****TCEQ-Region 10  
Beaumont**

**RE:** Notice of Violation for the Compliance Evaluation Investigation at:  
Baker Oil Tools (formerly Tri-State Oil Tools, Inc.)  
6810 S. Major Drive, Beaumont (Jefferson County), Texas  
TCEQ ID No: 49019, Investigation ID No: 533770; RN102444957

Dear Ms. Kelly

Baker Oil Tools (BOT) a division of Baker Hughes Oilfield Operations, Inc. (BHOO) respectfully submits this letter in response to the Notice of Violation (NOV) the Texas Commission on Environmental Quality (TCEQ) issued on December 22, 2006 regarding the possibility of a former underground storage tank (UST) located at the above referenced property. As discussed during telephone conversations with Mr. Gary Tidwell and Mr. Nathan Norman with the TCEQ and conferring with several BOT employees regarding the UST, there is no known UST located at the subject property. In addition, as stated in the TCEQ Summary of Investigation Findings, no USTs or fill ports were observed at the site during the investigation conducted on November 1, 2006. Specific information is provided below in response to the NOV for the compliance evaluation investigation.

**Alleged Violation: Track No: 262684**

Failure to amend registration for any change or additional information regarding underground storage tanks (USTs).

**RESPONSE:** An updated registration form indicating the change in operator and permanent removal of the UST for the location in question is included as Attachment 1.

**Alleged Violation: Track No: 262685**

Failure to permanently remove from service an existing UST system.

**RESPONSE:** Based on a diligent review of our records and a review of the Petroleum Storage Tank (PST) database, the following information is provided to document permanent removal of the UST from service.

1. An affidavit from a former employee of Tri-State Oil Tools, Inc. stating that the UST was permanently removed from service in the mid to late 1980's is included in Attachment 2.
2. According to the PST Database, the UST in question was installed/registered between January 1984 and September 1989. It is our understanding that the UST was removed from service in the mid to late 1980s which corresponds with the registration date listed in the PST Registration



Database. Furthermore, it appears that the facility registration information was not updated or entered incorrectly into the database at the time of removal to illustrate the change in status as inactive.

3. Tri-State Oil Tool Industries, Inc. was acquired by Baker Oil Tools, Inc. in 1973. Tri-State Oil Tools, Inc. was merged into Baker Hughes Production Tools, Inc. in March 1992 at which time, a portion of the production line co-mingled with Baker Oil Tools. Based on a thorough review of our records, no documentation of the removal has been discovered. If such documentation is found, a copy will be submitted to the TCEQ.

BOT appreciate your consideration of the information provided in this response letter. If you have any questions or require additional information, please do not hesitate to contact me at (713) 466-2955.

Sincerely,

Myna D. Letlow, P.G.  
Environmental Manager

cc: Victor Carver, BOT - Operations Manager  
Graham Harvey, BOT - Manager Operations I - Fishing  
Jill Schultz, BOT - North America HS&E Manager



# **Attachment 1**

## **Underground Storage Tank Registration Form**

TCEQ UNDERGROUND STORAGE TANK REGISTRATION & SELF-CERTIFICATION FORM

See this form for filing procedures and instructions for completion.

 <p>For Use in TEXAS</p>	<p><b>Texas Commission On Environmental Quality</b></p> <p>• Please mail completed form to                  Petroleum Storage Tank Registration Team (MC-138)                  Texas Commission on Environmental Quality                  P. O. Box 13087 *MAKE COPY OF FORM FOR YOUR RECORDS                  Austin, Texas 78711-3087                  (512) 239-2160 Fax (512) 239-3398</p>	TCEQ Facility ID No. <b>49019</b>
		TCEQ Owner ID No.:
		Federal Tax ID No.:

1 TANK OWNER INFORMATION

TANK OWNER BUSINESS OR LAST NAME <b>Baker Hughes Oilfield Operations, Inc.</b>	TANK OWNER FIRST NAME	TYPE OF TANK OWNER: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Proprietorship DBA <input type="checkbox"/> Federal Gov't <input type="checkbox"/> State Gov't <input type="checkbox"/> Local Gov't <input type="checkbox"/> County Gov't <input type="checkbox"/> City Gov't <input type="checkbox"/> Other (specify):	
OWNER MAILING ADDRESS <b>9100 Emmott Road</b>		LOCATION OF RECORDS: <input type="checkbox"/> At facility <input type="checkbox"/> Offsite at:	
CITY: <b>Houston</b> STATE: <b>TX</b> ZIP CODE: <b>77040</b>	OFFSITE RECORDS LOCATION ADDRESS CITY STATE		
COUNTRY (OUTSIDE USA)	E-MAIL ADDRESS <b>myna.letlow@bakerhughes.com</b>	RECORDS CUSTODIAN/CONTACT PERSON	TELEPHONE NO.
OWNER'S AUTHORIZED REPRESENTATIVE <b>Myna Letlow</b>	TITLE: <b>Env. Mgr.</b> TELEPHONE NO.: <b>(713) 466-2955</b>	FAX NO.: <b>(713) 466-2650</b>	INDEPENDENTLY OWNED & OPERATED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
STATE FRANCHISE TAX ID <b>1941302886</b>	DUNN NO <b>615157625</b>	NUMBER OF EMPLOYEES <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 & HIGHER	

**"For Self-Certification only this form will not be processed until all delinquent fees and penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol."**

2 FACILITY INFORMATION

FACILITY NAME <b>Baker Oil Tools (formerly Tri-State Oil Tools INC)</b>		TYPE OF FACILITY: <input type="checkbox"/> Retail <input type="checkbox"/> Farm or Residential <input type="checkbox"/> Wholesale <input type="checkbox"/> Fleet Refueling <input type="checkbox"/> Aircraft Refueling <input type="checkbox"/> Indian Land <input checked="" type="checkbox"/> Indust./Mfg./Chem. Plant <input type="checkbox"/> Watercraft Fueling <input type="checkbox"/> Other (specify):			
PHYSICAL LOCATION <b>6810 S. Major Drive</b>		Number of regulated USTs at this facility: <b>0</b>			
CITY: <b>Houston</b> STATE: <b>TEXAS</b> ZIP CODE: <b>77705</b> COUNTY: <b>Jefferson</b>	Number of regulated ASTs at this facility: <b>0</b>				
ON-SITE CONTACT PERSON <b>Victor Carver</b>	TITLE: <b>Operations Mgr.</b>	TELEPHONE NO.: <b>(409) 842-2567</b>			
E-MAIL ADDRESS <b>victor.carver@bakeroilttools.com</b>	FAX NUMBER <b>(409) 842-5327</b>	PRIMARY SIC CODE <b>1389</b>	SECONDARY SIC CODE		
		PRIMARY NAICS CODE <b>213112</b>	SECONDARY NAICS CODE		
LATITUDE Degrees: <b>30</b> Minutes: <b>0</b> Seconds: <b>14</b>	LONGITUDE Degrees: <b>94</b> Minutes: <b>11</b> Seconds: <b>10</b>				

3 TANK OPERATOR INFORMATION  (mark here if same as owner)

\* "Operator" means any person in day-to-day control of, and having responsibility for, the daily operation of the UST system.

TCEQ Operator ID No.: **(Assigned by TCEQ) CN**

TANK OPERATOR NAME (DO NOT LIST EMPLOYEES OF OPERATOR)	TYPE OF TANK OPERATOR: <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Proprietorship DBA <input type="checkbox"/> Federal Gov't <input type="checkbox"/> State Gov't <input type="checkbox"/> County Gov't <input type="checkbox"/> City Gov't <input type="checkbox"/> Local Gov't <input type="checkbox"/> Other (specify):
MAILING ADDRESS	
CITY STATE ZIP CODE COUNTY	
OPERATOR'S AUTHORIZED REPRESENTATIVE TITLE TELEPHONE NO.	Date listed person became operator: ___/___/___

# **Attachment 2**

**Affidavit**

**AFFIDAVIT OF LUTHER GRAHAM HARVEY**

**RE: Notice of Violation for the Out of Service Investigation**  
**TCEQ FID NO: 49019; Investigation ID No: 533770; RN102444957**

BEFORE ME, the undersigned authority, on this day personally appeared Graham Harvey, and upon his oath did state:

"My name is Luther Graham Harvey. I am over eighteen years of age and qualified to make this Affidavit. I am currently employed as Manager Operation I – Fishing for Baker Oil Tools, a division of Baker Hughes Oilfield Operations, Inc. I have been informed that the Texas Commission on Environmental Quality (TCEQ) issued a Notice of Violation for non compliance issues related to a former petroleum underground storage tank at the Baker Oil Tools (BOT) facility (formerly the location of Tri-State Oil Tools Inc.) located at 6810 S Major Drive in Beaumont (Jefferson County), Texas. Furthermore, the TCEQ has requested information demonstrating that compliance with applicable requirements for petroleum underground storage tanks has been achieved for the alleged violation of failure to permanently remove the petroleum underground storage tank from service. The facts stated below are based on my personal knowledge and are true and correct."

I was employed by Tri-State Oil Tools Inc. and located at the Beaumont facility referenced above between 1977 and 1999. During the mid to late 1980's, an underground storage tank was permanently removed from service at the above referenced location. A subcontractor performed the removal activities; however, after diligent search there has been no documentation discovered to support the removal.

FURTHER AFFIANT SAYETH NOT.

  
Luther Graham Harvey

Subscribed and sworn to before me on this the 5<sup>th</sup> day of January 2007, to certify which witness my hand and seal of office.

  
Notary Public in and for the State of ~~Texas~~ Louisiana 058013



Baker Oil Tools

9100 Emmett Road (77040)  
P.O. Box 40129  
Houston, Texas 77240-0129

CERTIFIED MAIL



7002 2410 0003 7761 0974



Hasler

096106503642  
\$03.279  
01/12/2007  
Mailed from 77650  
US POSTAGE

Texas Commission on Environmental Quality  
Region 10 - Beaumont Region Office

3870 Eastex Fwy.

Beaumont, TX 77703-1830

ATTN: Susan Kelly

West Section Work Leader

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Tri-State Oil Tools, Inc.**

PST Facility ID: 49019

CCEDS: 609356

11/16/2007

**ATTACHMENT 2**

**Faxed UST Registration & Self-Certification Form**





Protecting Texas  
by Reducing and  
Preventing Pollution

# FAX TRANSMITTAL

DATE: December 3, 2007

NUMBER OF PAGES (including this cover sheet): 17

TO: Name Sharon Hill  
Organization TCEQ PST Registration/Reporting Section  
FAX Number (512) 239-3399

FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
Name Garry Tidwell  
Division/Region TCEQ Field Operations Division/Region 10  
Telephone Number (409) 899-8779  
FAX Number (409) 892-2119

NOTES:

Sharon,

Attached are amended UST registrations for the following PST facilities:

PST Facility ID # 49019, Tri-State Oil Tools, Inc.

PST Facility ID # 25417 Lacey Petroleum, Inc.

These UST registration forms were included in compliance documents and release determination report submitted to the TCEQ Region 10, Beaumont Office.

Please input this information into the PST Registration Database.

Thanks for your help.

Garry

**Health, Safety & Environmental**

Baker Oil Tools  
Myna Letlow  
9100 Emmott Road  
Houston, TX 77040  
P. O. Box 40129 (7740-0129)  
Tel: 713 466-2955  
Fax: 713 466-2650

12 January 2007

**RECEIVED**

**JAN 17 2007**

**TCEQ-Region 10  
Beaumont**

Ms. Susan Kelly  
Waste Section Work Leader  
Texas Commission on Environmental Quality  
Beaumont Region Office  
3870 Eastex Fwy  
Beaumont, Texas 77703-1830

**RE:** Notice of Violation for the Compliance Evaluation Investigation at:  
Baker Oil Tools (formerly Tri-State Oil Tools, Inc.)  
6810 S. Major Drive, Beaumont (Jefferson County), Texas  
TCEQ ID No: 49019, Investigation ID No: 533770, RN102444957

Dear Ms. Kelly

Baker Oil Tools (BOT) a division of Baker Hughes Oilfield Operations, Inc. (BHOO) respectfully submits this letter in response to the Notice of Violation (NOV) the Texas Commission on Environmental Quality (TCEQ) issued on December 22, 2006 regarding the possibility of a former underground storage tank (UST) located at the above referenced property. As discussed during telephone conversations with Mr. Gary Tidwell and Mr. Nathan Norman with the TCEQ and conferring with several BOT employees regarding the UST, there is no known UST located at the subject property. In addition, as stated in the TCEQ Summary of Investigation Findings, no USTs or fill ports were observed at the site during the investigation conducted on November 1, 2006. Specific information is provided below in response to the NOV for the compliance evaluation investigation.

**Alleged Violation: Track No: 262684**

Failure to amend registration for any change or additional information regarding underground storage tanks (USTs)

**RESPONSE:** An updated registration form indicating the change in operator and permanent removal of the UST for the location in question is included as Attachment 1.

**Alleged Violation: Track No: 262685**

Failure to permanently remove from service an existing UST system.

**RESPONSE:** Based on a diligent review of our records and a review of the Petroleum Storage Tank (PST) database, the following information is provided to document permanent removal of the UST from service.

1. An affidavit from a former employee of Tri-State Oil Tools, Inc. stating that the UST was permanently removed from service in the mid to late 1980's is included in Attachment 2.
2. According to the PST Database, the UST in question was installed/registered between January 1984 and September 1989. It is our understanding that the UST was removed from service in the mid to late 1980s which corresponds with the registration date listed in the PST Registration



Database. Furthermore, it appears that the facility registration information was not updated or entered incorrectly into the database at the time of removal to illustrate the change in status as inactive.

3. Tri-State Oil Tool Industries, Inc. was acquired by Baker Oil Tools, Inc. in 1973. Tri-State Oil Tools, Inc. was merged into Baker Hughes Production Tools, Inc. in March 1992 at which time, a portion of the production line co-mingled with Baker Oil Tools. Based on a thorough review of our records, no documentation of the removal has been discovered. If such documentation is found, a copy will be submitted to the TCEQ.

BOT appreciate your consideration of the information provided in this response letter. If you have any questions or require additional information, please do not hesitate to contact me at (713) 466-2955.

Sincerely,

Myna D. Letlow, P.G.  
Environmental Manager

cc: Victor Carver, BOT - Operations Manager  
Graham Harvey, BOT - Manager Operations I - Fishing  
Jill Schultz, BOT - North America HS&E Manager



# **Attachment 1**

## **Underground Storage Tank Registration Form**

TCEQ - UNDERGROUND STORAGE TANK REGISTRATION & SELF-CERTIFICATION FORM

(Use this form for filing registration and self-certification information.)

Page 1 of 5

For Use in TEXAS	 <b>Texas Commission On Environmental Quality</b> • Please mail completed form to: Petroleum Storage Tank Registration Team (MC-138) Texas Commission on Environmental Quality P. O. Box 13087 MAKE COPY OF FORM FOR YOUR RECORDS Austin, Texas 78711-3087 (512) 239-2100 Fax (512) 239-3398	TCEQ Facility ID No. <b>49019</b>
		TCEQ Owner ID No.:
		Federal Tax ID No.:

**1. TANK OWNER INFORMATION**

Tank Owner Business or Last Name <b>Baker Hughes Oilfield Operations, Inc.</b>	TYPE OF TANK OWNER: <input type="checkbox"/> Sole Proprietorship DBA <input type="checkbox"/> State Gov't <input type="checkbox"/> Local Gov't <input type="checkbox"/> County Gov't <input type="checkbox"/> City Gov't <input checked="" type="checkbox"/> Other (specify): CORPORATION
Owner Mailing Address <b>9100 Emmott Road</b>	LOCATION OF RECORDS: <input type="checkbox"/> At facility <input type="checkbox"/> Offsite at: OFFSITE RECORDS LOCATION: ADDRESS CITY STATE
CITY STATE ZIP CODE <b>Houston TX 77040</b>	RECORDS CUSTODIAN/CONTACT PERSON TELEPHONE NO.
COUNTRY (OUTSIDE USA) E-MAIL ADDRESS <b>myrna.letlow@bakerhughes.com</b>	OWNER'S AUTHORIZED REPRESENTATIVE TITLE TELEPHONE NO. FAX NO. INDEPENDENTLY OWNED & OPERATED <b>Myna Letlow Env Mgr (713) 466-2955 (713) 466-2650</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
STATE FRANCHISE TAX ID DUNN NO. <b>1941302886 615157625</b>	NUMBER OF EMPLOYEES <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 & HIGHER

**\*\*For Self-Certification only this form will not be processed until all delinquent fees and penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol.\*\***

**2. FACILITY INFORMATION**

Facility Name <b>Baker Oil Tools (formerly Tri-State Oil Tools INC)</b>	TYPE OF FACILITY: <input type="checkbox"/> Retail <input type="checkbox"/> Farm or Residential <input type="checkbox"/> Wholesale <input type="checkbox"/> Fleet Refueling <input type="checkbox"/> Aircraft Refueling <input type="checkbox"/> Indian Land <input checked="" type="checkbox"/> Indust./Mfg./Chem. Plant <input type="checkbox"/> Watercraft Fueling <input type="checkbox"/> Other (specify):
Physical Location <b>6810 S. Major Drive</b>	Number of regulated USTs at this facility: <b>0</b>
CITY STATE ZIP CODE COUNTY <b>Houston TEXAS 77705 Jefferson</b>	Number of regulated ASTs at this facility: <b>0</b>
On-Site Contact Person TITLE TELEPHONE NO. <b>Victor Carver Operations Mgr (409) 842-2567</b>	
E-MAIL ADDRESS FAX NUMBER <b>victor.carver@bakeroiltools.com (409) 842-5327</b>	PRIMARY SIC CODE SECONDARY SIC CODE <b>1389</b>
LATITUDE DEGREES MINUTES SECONDS <b>30 0 14</b>	PRIMARY NAICS CODE SECONDARY NAICS CODE <b>213112</b>
LONGITUDE DEGREES MINUTES SECONDS <b>94 11 10</b>	

**3. TANK OPERATOR INFORMATION**  (mark here if same as owner)

\* "Operator" means any person in day-to-day control of, and having responsibility for, the daily operation of the UST system.

TCEQ Operator ID No.: **(Assigned by TCEQ) CN**

Tank Operator Name (DO NOT LIST EMPLOYEES OF OPERATOR)	TYPE OF TANK OPERATOR: <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Proprietorship DBA <input type="checkbox"/> Federal Gov't <input type="checkbox"/> State Gov't <input type="checkbox"/> County Gov't <input type="checkbox"/> City Gov't <input type="checkbox"/> Local Gov't <input type="checkbox"/> Other (specify):
Mailing Address	Date listed person became operator: / /
CITY STATE ZIP CODE COUNTY	
OPERATOR'S AUTHORIZED REPRESENTATIVE TITLE TELEPHONE NO.	

**TCEQ- UST REGISTRATION & SELF-CERTIFICATION FORM****4. REASON FOR THIS FILING****PART A). UST REGISTRATION INFORMATION** (Mark all that apply)

- 1  Initial Registration    2  UST Ownership Change (**New Owner** indicate effective date: 03 / 24 / 1992)
- 3  Amendment of:    a  Owner Information    b  Operator Information    c  Facility Information
- 4  UST System Information    e  Financial Assurance Information
- 4  Other (specify): \_\_\_\_\_

Note: Please refer to the instruction sheet for assistance in completing Part A.

**PART B). UST COMPLIANCE SELF-CERTIFICATION INFORMATION** (Mark all that apply):

- 1  Initial Certification at Facility (Including Tank Ownership Change)    2  Annual Renewal
- 3  New Tank at Facility    4  Other (specify): \_\_\_\_\_

Note: Please refer to the instruction sheet for assistance in completing Part B.

NOT APPLICABLE

**5. TCEQ PROGRAMS IN WHICH THIS REGULATED ENTITY PARTICIPATES** Animal Feeding Operation Petroleum Storage Tank Water Rights Title V - Air Wastewater Permit \_\_\_\_\_ Industrial & Hazardous Waste Water Districts \_\_\_\_\_ Municipal Solid Waste Water Utilities Unknown New Source Review - Air Licensing - Type (S)**6. INSTALLER/ON-SITE SUPERVISOR CERTIFICATION**

**NOTE:** This section must be completed and signed by the Installer or On-Site Supervisor. Leave blank if no tank or underground line installation activity involved.

Was tank and/or line testing completed during and after installation?    Yes     No

DATE(S) INSTALLATION ACTIVITIES PERFORMED:

CONTRACTOR (COMPANY OR FIRM):

TCEQ CRP No.:

CRP

INDIVIDUAL INSTALLER/ON-SITE SUPERVISOR:

TCEQ ILP No.:

ILP

I hereby certify that the information provided concerning recent installations were conducted by me or under my direct supervision, that I am familiar with the TCEQ requirements applicable to such activities, and that to the best of my knowledge and belief such activities were performed in conformance with applicable TCEQ UST regulations.

SIGNATURE OF INSTALLER/SUPERVISOR:

DATE OF SIGNATURE

PST-49019-IN  
**Texas Commission on Environmental Quality**

**Investigation Report**

**BAKER OIL TOOLS  
 CN601720188**

RECEIVED

**TRI-STATE OIL TOOLS INC**

**RN102444957**

JAN 11 2007

TOOQ  
 CENTRAL FILE ROOM

Investigation # 533770

Investigator: GARRY TIDWELL

Incident #

Site Classification

UNDERGROUND STORAGE TANK -  
 REGISTRATION

Conducted: 11/01/2006 -- 11/01/2006

No Industry Code Assigned

Program(s): PETROLEUM STORAGE TANK REGISTRATION

Investigation Type: Compliance Investigation

Location:

Additional ID(s): 49019

Address: 6810 S MAJOR DR;  
 BEAUMONT, TX 77705

Activity Type:

REGION 10 - BEAUMONT

PSTOofs - Investigation at a facility with an  
 out-of-service UST system

Principal(s):

Role	Name
RESPONDENT	BAKER OIL TOOLS

Contact(s):

Role	Title	Name	Phone
Regulated Entity Contact	ENVIRONMENTAL MANAGER	MYNA LETLOW	Fax (713) 466-2650 Work (713) 466-2955
Participated in Investigation	HS&E SPECIALIST IV - HEALTH, SAFETY & ENVIRONMENT	JIM KRAJEWSKI	Work (210) 491-9058
Notified	VICE-PRESIDENT	JOHN LOHMAN	Work (713) 439-8600
Notified	VICE-PRESIDENT HEALTH, SAFETY, & ENVIRONMENT	HALINA CARAVELLO	Fax (713) 439-8383 Work (713) 439-8301
Regulated Entity Mail Contact	NORTH AMERICA HS&E MANAGER	JILL SCHULTZ	Fax (713) 466-2650 Work (713) 466-2946
Participated in Investigation	HS&E COORDINATOR/QUALITY CONTROL - SOUTH TEXAS OPERATIONS	RENE OUBRE	Work (361) 894-1222

Other Staff Member(s):

Role	Name
Supervisor	SUSAN KELLY
QA Reviewer	NATHAN NORMAN

**Associated Check List**

Checklist Name	Unit Name
PST OUT OF SERVICE (OOFs) CHECKLIST	49019 PST OOFs INV

Investigation Comments:

INTRODUCTION

On 11/01/2006 Garry Tidwell, Environmental Investigator, accompanied by Ms. Susan Kelly, Waste Section Work Leader, conducted an unannounced Out of Service Tank Investigation at Tri-State Oil

TRI-STATE OIL TOOLS INC - BEAUMONT

November 01 06 Inv. # - 533770

Page 2 of 3

Tools, Inc. PST Facility ID: 49019, located at 6810 S. Major Drive in Beaumont (Attachment 1). The investigator tried contacting the owner listed on the PST database; however, no current contact number could be found. Upon arrival at the facility, a physical evaluation of the property was conducted.

GENERAL FACILITY AND PROCESS INFORMATION

The TCEQ PST Registration Database indicates that Tri-State Oil Tools, Inc. is the owner of the facility. The facility consists of one 3,000 gallon capacity steel tank with steel piping.

BACKGROUND

The tank was installed on 01/01/1984 and registered with the TCEQ on 09/05/1989. The tank was registered as temporary out of use, but no status date was indicated in the database.

ADDITIONAL INFORMATION

At the time of the investigation, no underground storage tank(s) or fill ports were observed at the site (Attachment 2).

On 11/02/2006, Mr. Tidwell obtained ownership information for the property from the Jefferson County Appraisal District and Jefferson County Tax Office. Property appraisal and tax records listed the Tri-States Oil Tools, Inc., as the owner of the property (Attachment 3).

CONCLUSION

On 12/14/2006, Mr. Tidwell contacted, via telephone, Ms. Haina Caravello of Baker Hughes, the parent company of Tri-State Oil Tools, Inc., regarding the alleged violations, an exit interview form was sent on 12/14/2006 (Attachment 4). On 12/15/2006, Ms. Myna Letlow, Baker Oil Tools Environmental Manager, was contacted, via telephone, regarding the alleged violations. Ms. Letlow informed Mr. Tidwell the NOV letter should be sent to her supervisor, Ms. Jill Schultz, Baker Oil Tools, North American HS&E Manager.

Attachments:

- 1) Site Map
- 2) Photographs
- 3) Property appraisal and tax records
- 4) Exit Interview Form
- 5) Baker Oil Tools (formerly Tri-State Oil Tools, Inc.) email correspondence and contact information

NOV Date	Method
12/20/2006	WRITTEN

OUTSTANDING ALLEGED VIOLATIONS

Track No: 262684 Compliance Due Date: 01/19/2007

30 TAC Chapter 334.7(d)(3)

**Alleged Violation:**  
 Investigation: 533770

Comment Date: 12/20/2006

Failure to amend registration for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition, or within 30 days of the date on which the owner or operator first became aware of the change or addition, as applicable.

At the time of the investigation, the TCEQ PST Registration database indicated that the facility registration information has not been properly amended to reflect the new owner or operator, or change in owner or operator information.

**Recommended Corrective Action:** Update Registration Form with requested information

TRI-STATE OIL TOOLS INC - BEAUMONT

11/1/2006 Inv. # - 533770

Page 3 of 3

**Resolution:**

Track No. 262685 Compliance Due Date: 01/19/2007

30 TAC Chapter 334.47(a)(2)

**Alleged Violation:**

Investigation: 533770

Comment Date: 12/21/2006

Failure to permanently remove from service, no later than 60 days after the prescribed upgrade implementation date, an existing UST system for which any applicable component of the system is not brought into timely compliance with the upgrade requirements.

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address; however, no USTs or fill ports were observed at the site.

**Recommended Corrective Action:** Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.

**Resolution:**

Signed B. Lidwell  
Environmental Investigator

Date 12/21/06

Signed M. Kelly  
Supervisor

Date 12/22/06

**Attachments: (in order of final report submittal)**

Enforcement Action Request (EAR)

Letter to Facility (specify type) N&V

Investigation Report

Sample Analysis Results

Manifests

NOR

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) Property tax record

Attachments 1-5



Resolution:

Track No: 262685 Compliance Due Date: 01/19/2007

30 TAC Chapter 334.47(a)(2)

Alleged Violation:

Investigation: 533770

Comment Date: 12/21/2006

Failure to permanently remove from service, no later than 60 days after the prescribed upgrade implementation date, an existing UST system for which any applicable component of the system is not brought into timely compliance with the upgrade requirements.

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address; however, no USTs or fill ports were observed at the site.

Recommended Corrective Action: Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.

Resolution:

Signed B. Lidman  
Environmental Investigator

Date 12/21/06

Signed Ann Kelly  
Supervisor

Date 12/22/06

Attachments: (in order of final report submittal)

- Enforcement Action Request (EAR)
- Letter to Facility (specify type): NOV
- Investigation Report
- Sample Analysis Results
- Manifests
- NOR

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify): Property tax record
- Attachments 1-5

Rathleen Hartnett White, *Chairman*  
Larry R. Soward, *Commissioner*  
Martin A. Hubert, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 22 2006

**CERTIFIED MAIL 7005 1820 0003 8110 3007**  
**RETURN RECEIPT REQUESTED**

Ms. Jill Schultz  
North America HS&E, Manager  
Baker Oil Tools  
9109 Emmott Road  
Houston, TX 77040-3596

Re: Notice of Violation for the Out of Service Investigation at:  
Baker Oil Tools (formerly Tri-State Oil Tools, Inc.), 6810 S. Major Drive,  
Beaumont (Jefferson County), Texas  
**TCEQ FID No.: 49019; Investigation ID No.: 533770; RN102444957**

Dear Ms. Schultz:

On November 1, 2006, Mr. Garry Tidwell and Ms. Susan Kelly of the Texas Commission on Environmental Quality (TCEQ) Beaumont Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for petroleum storage tanks. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **January 21, 2007** a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules." Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at (800) 490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. TCEQ's enforcement powers include authority under Texas Water Code §26.3475 to order the shutdown of any underground storage tank (UST) system which is found to be noncompliant with release detection, spill and/or overfill prevention, and corrosion protection regulations until such time as the UST system is brought into compliance with Commission regulations. We anticipate that you will

REPLY TO: REGION 10 • 3870 EASTEX FWY. • BEAUMONT, TEXAS 77703-1830 • 409/898-3838 • FAX 409/892-2119

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

## Summary of Investigation Findings

TRI-STATE OIL TOOLS INC  
6810 S MAJOR DR  
BEAUMONT, JEFFERSON COUNTY, TX 77705  
Additional ID(s): 49019

Investigation # 533770  
Investigation Date: 11/01/2006

### OUTSTANDING ALLEGED VIOLATIONS

Track No: 262684      Compliance Due Date: 01/19/2007  
30 TAC Chapter 334.7(d)(3)

**Alleged Violation:**

Investigation: 533770

Comment Date: 12/20/2006

Failure to amend registration for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition, or within 30 days of the date on which the owner or operator first became aware of the change or addition, as applicable.

At the time of the investigation, the TCEQ PST Registration database indicated that the facility registration information has not been properly amended to reflect the new owner or operator, or change in owner or operator information.

**Recommended Corrective Action:** Update Registration Form with requested information.

Track No: 262685      Compliance Due Date: 01/19/2007  
30 TAC Chapter 334.47(a)(2)

**Alleged Violation:**

Investigation: 533770

Comment Date: 12/21/2006

Failure to permanently remove from service, no later than 60 days after the prescribed upgrade implementation date, an existing UST system for which any applicable component of the system is not brought into timely compliance with the upgrade requirements.

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address; however, no USTs or fill ports were observed at the site.

**Recommended Corrective Action:** Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.

**OUTSTANDING ALLEGED VIOLATIONS**

Track No: 262684 Compliance Due Date: 01/19/2007  
30 TAC Chapter 334.7(d)(3)

**Alleged Violation:**  
Investigation: 533770

Comment Date: 12/20/2006

Failure to amend registration for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition, or within 30 days of the date on which the owner or operator first became aware of the change or addition, as applicable.

At the time of the investigation, the TCEQ PST Registration database indicated that the facility registration information has not been properly amended to reflect the new owner or operator, or change in owner or operator information.

**Recommended Corrective Action:** Update Registration Form with requested information.

Track No: 262685 Compliance Due Date: 01/19/2007  
30 TAC Chapter 334.47(a)(2)

**Alleged Violation:**  
Investigation: 533770

Comment Date: 12/21/2006

Failure to permanently remove from service, no later than 60 days after the prescribed upgrade implementation date, an existing UST system for which any applicable component of the system is not brought into timely compliance with the upgrade requirements.

At the time of the investigation, the building at 6810 S. Major Drive, Beaumont, Texas 77705 was identified as Baker Hughes Baker Oil Tools. The PST Registration database lists one 3,000 gallon UST at the address, however, no USTs or fill ports were observed at the site.

**Recommended Corrective Action:** Provide documentation to verify the USTs have been permanently removed from service in accordance with 30 TAC 334.55.



3007  
3007

U.S. Postal Service  
CERTIFIED MAIL - RECEIPT  
(Domestic Mail Only. No Insurance Coverage Provided)

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**



**Tri-State Oil Tools Inc.**

PST Facility ID: 49019  
CCEDS: 533770  
11/01/2006

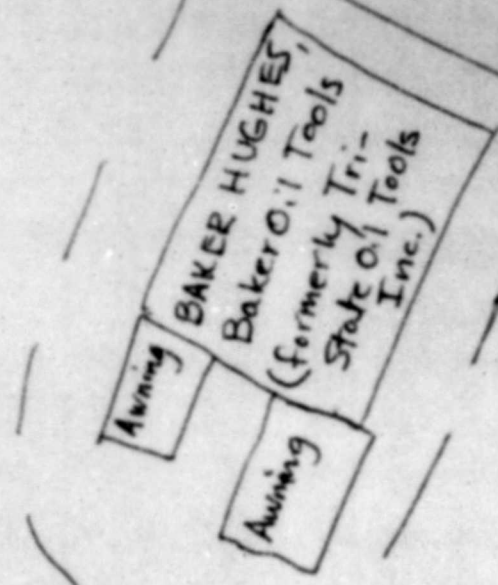
**ATTACHMENT 1**

Site Map

STAEDTLER® No. 937 811E  
Engineer's Computation Pad

Site Map

IH-10  
To Beaumont



Communications  
Tower

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## **Tri-State Oil Tools Inc.**

PST Facility ID: 49019

CCEDS: 533770

11/01/2006

## **ATTACHMENT 2**

Photographs

**APPENDIX V**

**INTERVIEWS / ADDITIONAL INFORMATION**



## RECORD OF COMMUNICATION

**Job #:** 201806054

**Job Address:** Approximately 183 acres along Interstate Highway 10, Beaumont, TX 77705

**Contact:** City of Beaumont Planning Division

<http://www.arcgis.com/home/webmap/viewer.html?webmap=1d69d6ac05d8441bb7086b3ce480d8d4&extent=-94.3938,29.9607,-93.8867,30.2161>

**Comments:**

Unincorporated areas of Jefferson County do not have zoning regulations.

Rey Garay  
**Phase Engineering, Inc.**  
5524 Cornish Street, Houston, Texas 77007  
(713) 476-9844  
[rey@phaseengineering.com](mailto:rey@phaseengineering.com)



**Date: June 20<sup>th</sup>, 2018**

**To: Beaumont Fire Department**

**Phone: (409)880-3901**

**FAX: (409)880-3931**

**EMAIL: [bfrcustomerservice@ci.beaumont.tx.us](mailto:bfrcustomerservice@ci.beaumont.tx.us)**

**From: Phase Engineering, Inc.**

5524 Cornish Street

Houston, TX 77007

713-476-9844

**RE: Open Records Request**

**For: Phase Engineering Job: 201806054**

Phase Engineering, Inc. is currently working on a Phase I Environmental Assessment of the property, located at:

1. **Address:** Approximately 183 acres along Interstate Highway 10, 77705 (Near 5898 Industrial Road, Beaumont, TX, 77705).
2. **Owner Name:** Whitmeyer Wesley B & Virginia Whitmeyer Bolton
3. **Property ID#:** 137574

We are requesting any information you may have concerning the storage, use, handling or dispensing of flammable liquid storage tanks, hazardous materials, or liquefied petroleum gas storage or incidents of environmental concern, at the above location or adjacent properties. Please notify us of any charges before proceeding.

Reply as soon as possible to: [research@PhaseEngineering.com](mailto:research@PhaseEngineering.com) or Fax 713-476-9797

Thank you very much for your assistance!



**Date: June 20<sup>th</sup>, 2018**

**To: City of Beaumont  
Environmental Health  
Attn: City Clerk's Office  
Phone: (409) 880-3745  
FAX: (409) 880-3740**

**From: Phase Engineering, Inc.**  
5524 Cornish Street  
Houston, TX 77007  
713-476-9844

**RE: Open Records Request  
For: Phase Engineering Job: 201806054**

Phase Engineering, Inc. is currently working on a Phase I Environmental Assessment of the property, located at:

1. **Address:** Approximately 183 acres along Interstate Highway 10, 77705 (Near 5898 Industrial Road, Beaumont, TX, 77705).
2. **Owner Name:** Whitmeyer Wesley B & Virginia Whitmeyer Bolton
3. **Property ID#:** 137574

**Health Department Records** - Any environmentally-related information, including, but not limited to notices of violation, complaints, fuel tank storage facilities, sample wells, grease traps, etc..

Please reply as soon as possible to: [research@PhaseEngineering.com](mailto:research@PhaseEngineering.com) or Fax 713-476-9797.

Thank you very much for your assistance!



**Date: June 20<sup>th</sup>, 2018**

**To: Beaumont City Clerk  
Community Development  
Phone: (409)880-3745  
FAX: (409) 880-3740**

**From: Phase Engineering, Inc.**  
5524 Cornish Street  
Houston, TX 77007  
713-476-9844

**RE: Open Records Request  
For: Phase Engineering Job: 201806054**

Phase Engineering, Inc. is currently working on a Phase I Environmental Assessment of the property, located at:

- 1. Address:** Approximately 183 acres along Interstate Highway 10, 77705 (Near 5898 Industrial Road, Beaumont, TX, 77705).
- 2. Owner Name:** Whitmeyer Wesley B & Virginia Whitmeyer Bolton
- 3. Property ID#:** 137574

Please provide copies of all permits submitted/approved, certificates of occupancy and building plans for the above property; notify us of any charges before proceeding.

Please reply as soon as possible to: [research@PhaseEngineering.com](mailto:research@PhaseEngineering.com) or Fax 713-476-9797

Thank you very much for your assistance!



**RECORD OF COMMUNICATION**

**Job #:** 201806054  
**Job Address:** Approximately 183 acres along Interstate 10 (South Side),  
Beaumont, Texas 77705  
**Contact:** Jared Bishop (Purchaser- 936 615 9015 cell)

**Comments:**

Phase Engineering Inc., interviewed Mr. Jared Bishop at the site during site visit. Mr. Bishop informed Phase Engineering, Inc. of the following:

- He stated that the current use of the subject property is undeveloped land.
- Mr. Bishop stated that the past usage of the property was undeveloped land.
- He is not aware of any hazardous substance or petroleum product release(s) on the subject property or on adjoining properties.
- He stated that the subject property is not served by municipal water or municipal sewer utilities.
- He is not aware of any prior Phase 1 site assessments conducted on the subject property.
- He is not aware of any current or historical ASTs or USTs located on the subject property.
- He has been associated with the subject property for approximately 10 years.



\_\_\_\_\_ Date: 06-21-2018

Inspected By: Zahir Jamal  
**Phase Engineering, Inc.**  
5524 Cornish Street, Houston, Texas 77007  
[jamal@phaseengineering.com](mailto:jamal@phaseengineering.com)  
832-485-2224

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## Section 6. User Responsibilities

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In order to qualify for one of the *Landowner Liability Protections* (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 all *users* must provide the following information (if available) to Phase Engineering, Inc. Failure to provide this information could result in a determination that “all appropriate inquiries” is not complete.

- 1) **Environmental liens that are filed or recorded against the property (40 CFR 312.25).**  
Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law?  **Yes**  **No**
  
- 2) **Activity and use limitations that are in place on the property or that have been filed or recorded against the property (40 CFR 312.26(a)(1)(v) and vi)).**  
Did a search of recorded land title records (or judicial records where appropriate) identify any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law?  **Yes**  **No**
  
- 3) **Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).**  
As the user of this ESA do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?  **Yes**  **No**
  
- 4) **Relationship to the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).**  
Does the purchase price being paid for this property reasonably reflect the fair market value of the property?  
 **Yes**  **No**  
If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?  **Yes**  **No**
  
- 5) **Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).**  
Are you aware of commonly known or reasonably ascertainable information about the property that would help Phase Engineering, Inc. to identify conditions indicative of releases or threatened releases? For example, as user,
  - a. Do you know the past uses of the property?  **Yes**  **No**
  - b. Do you know of specific chemicals that are present or once were present at the property?  **Yes**  **No**
  - c. Do you know of spills or other chemical releases that have taken place at the property?  **Yes**  **No**
  - d. Do you know of any environmental cleanups that have taken place at the property?  **Yes**  **No**
  
- 6) **The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).**  
As the user of this ESA, based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of contamination at the property?  **Yes**  **No**

**Comments from Questions 1-6:**

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Please have the user (s) of the Phase I report answer and return this page with the signed letter of engagement.

**Property Address or Description:**

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**Print Name:** \_\_\_\_\_ **Company:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Relation to property:** \_\_\_\_\_  
(purchaser, lender, owner, lessee, etc.)

**APPENDIX VI**

**LETTER OF ENGAGEMENT**

# Phase Engineering, Inc.

Environmental Consultants

May 30, 2018

Parigi Property Management, Ltd.  
Sam C. Parigi, Jr.  
445 North 14th Street  
Beaumont, TX 77702  
Phone: (409) 833-9555 Ext. 104 Fax: (409) 833-9522 Email: [scp@parigiproperty.com](mailto:scp@parigiproperty.com)

We are pleased to make the following proposal for Professional Environmental Services:

Current Use: Land - Undeveloped  
Address/ Property Location: Along I-10 Southwest of Major Drive  
City: Beaumont County: Jefferson State: TX Zip: 77707

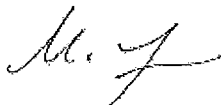
Perform a Phase I Environmental Site Assessment as per the ASTM E 1527-13 Standard.  
Includes ASTM Standard Non Scope Considerations: Review of readily available information of potential Endangered Species and Wetlands

- Terms: Net due prior to receipt of final report.
- Includes: Electronic version in PDF with findings, opinions and conclusions. Originals @ \$125.00 each.
- Chain of title search and environmental lien search not included in pricing and are to be provided to PEI by Client. If requested for PEI to perform, additional charges may apply.
- Delivery: Final report approximately 10 business days from signed letter of engagement. We rely on state regulators for information that may not be readily available for review within the time frame requested for the scheduled delivery date. Delivery charges may apply, not to exceed \$30.00 per delivery, unless client arranges for pick-up at their own expense.

If the above terms and attached Agreement for Professional Environmental Consulting Services (General Terms & Conditions) are acceptable, please sign and fax (eFax 281-200-0060) or email ([proposals@phaseengineering.com](mailto:proposals@phaseengineering.com)) a copy of this letter to serve as a letter of engagement and notification to proceed. The following information is needed to complete by scheduled delivery date:

1. Current owner of the property and telephone number.
2. Contact name and telephone number.
3. Access to the property, which may include keys or combinations, if applicable.
4. All complete environmental reports.
5. Survey and legal description. Survey does not have to be new if it reflects the property correctly.
6. All entities for which the report will be addressed and invoicing information. If this information is not given to Phase Engineering, Inc. in a legible format, the above named will be identified as user of the report and will be invoiced directly.

Thank you for the opportunity to work with you and your environmental needs. If you have any questions, please call me at (713) 476-9844 or 1-800-419-8881.

  
Melanie Edmundson P.G.  
Principal

Accepted By:   
Print Name: SAM C PARIGI JR

Date: 06-12-18



# AGREEMENT FOR PROFESSIONAL ENVIRONMENTAL CONSULTING SERVICES

## Section 1 – General Terms and Conditions

### 1.1 Definitions

“Agreement” means this Agreement for Professional Environmental Consulting Services.

“Party” (or collectively, “Parties”) means PEI and Client, unless expressly stated otherwise in this Agreement.

“PEI” means Phase Engineering, Inc.

“Engagement Letter” the instrument delivered by PEI to the Parties

“Services” has the meaning set forth in Section 1.2 below.

Any capitalized terms not otherwise defined in this Agreement have the meanings given to them under the Engagement Letter.

### 1.2 Services

The professional environmental consulting services to be provided by PEI for the Client are set forth in the Engagement Letter, and such services, including subsequent services, changed, altered or additional services are hereinafter called the “Services”.

### 1.3 Standard of Care

PEI shall perform the services under this agreement with that degree of care, skill and diligence generally accepted as typical of the industry in the performance of such services as contemplated by the Agreement at the time and location such services are rendered. PEI shall employ only competent staff and sub-contractors who will be under the supervision of a senior member of PEI's staff.

### 1.4 Rights of Entry, Site Information and Utilities

The Client shall provide right of entry for PEI and its subcontractors to carry out the Services, unless specified otherwise in the Engagement Letter. The Client warrants that it has furnished to PEI all information known to, or in possession or control of, the Client relating to the past and existing conditions of the site, including but not limited to soil and geologic data, contaminants, wastes, petroleum products, controlled substances, hazardous materials, and subsurface utilities. The Client shall extend use and reliance of this information to PEI, unless stated otherwise and to the extent permitted by law. Such information shall be and remain confidential as between the Client and PEI and PEI shall not disclose same to any third party unless required by law.

### 1.5 Safety

1.5.1 PEI maintains a General Health and Safety Plan, a copy of which will be provided to the Client on written request and will fall under Section 1.8 Subsequent Changes of this Agreement unless this service is included in the Engagement Letter.

1.5.2 PEI shall take every precaution reasonable in the circumstances for the protection of the workers providing any of the Services. When required and prior to any field work being carried out, PEI shall provide the Client with a comprehensive site-specific safety plan for providing the Services. Such request must be made in writing by the Client prior to commencement of the Services by PEI and will fall under Section 1.9 Subsequent Changes of this Agreement unless included in the Engagement Letter.

### 1.6 Investigations and Reports

1.6.1 Findings: The findings of any investigation undertaken as part of the Services will be based upon information generated as a result of the specific scope of the Services as described in the Engagement Letter.

1.6.2 Restoration: The Client accepts that in the normal course of the Services some damage to existing ground or other surface finishes may occur, the restoration of which shall be the responsibility of the client or as specified in the Engagement Letter.

1.6.3 Investigations: The parties acknowledge and accept that unique risks exist whenever engineering or related disciplines are applied to identify environmental conditions and even a comprehensive sampling and testing program may fail to detect certain conditions. Because of the inherent uncertainties in environmental evaluations, changed or unanticipated conditions may occur or become known subsequent to PEI's investigation that could affect conclusions, recommendations, total Project cost and/or execution. Changes in conditions are subject to amendments to the Scope of Services.

1.6.4 Confidentiality and Reliance: Any Final Report or draft reports and the information contained therein shall be treated as confidential and, unless otherwise agreed to by PEI and the Client, the information, sampling data, analysis, findings, conclusions and recommendations (if any), may be used and relied upon only by the Client, its officers, directors and employees and professional advisors in the performance of their obligations for or on behalf of the Client. Any such use and reliance shall be subject to the limitations set forth in this agreement. In addition, the Client may submit any report to a regulatory authority or lender for the purpose of obtaining financing on a property.

1.6.5 Third Party Reliance: This Agreement and the Services provided are for Consultant and Client's sole benefit and exclusive use with no third party beneficiaries intended. Reliance upon the Services and any work product is limited to Client, and is not intended for third parties. In the event PEI agrees, in its sole and absolute discretion, to make the Report available to a third party not mentioned in Paragraph 1.6.4, the Third Party shall be required to obtain the original Client's release, sign PEI's standard Authorized User Agreement (AUA) and pay PEI a fee of not less than \$350.00. Any such use shall be subject to the terms, conditions and limitations set forth in this Agreement, the Report and the AUA.

### 1.7 Ownership of Records/Reports:

All documents or records created or prepared by PEI in the performance of the Services are considered PEI's professional work product and shall remain the copyright property of PEI, subject to any reasonable disclosure request from the Client as may be necessary and for which reasonable reimbursement for copies is provided.

### 1.8 Disposal and Samples

1.8.1 Disposal of all wastes generated from the subject property shall be the responsibility of the Client.

1.8.2 PEI shall be responsible for appropriate disposal of sample material and sample residuals after 30 days following submission of the Final Report unless the Client specifically requests otherwise.

### **1.9 Subsequent Changes**

With the consent of PEI, the Client may in writing at any time after the execution of this Agreement or the commencement of the Services delete, extend, increase, vary or otherwise alter the Services. The Parties further agree that such changes shall alter the Services, schedule and/or the costs. Any such changes shall be made in writing with reference to this Agreement, and accepted in writing by both Parties.

### **1.10 Delays**

Neither Party shall be liable or penalized for delays or failure to perform its Services if the same is caused directly or indirectly by circumstances beyond a Party's reasonable control. The Client shall not hold PEI responsible for damages or delays in performance caused by the Client, acts of God, acts and/or omissions of governmental authorities and regulatory agencies or other events which are beyond the reasonable control of the Parties.

### **1.11 Payment**

- 1.11.1 The PEI shall invoice the Client in accordance with the provisions set forth in the Engagement Letter. Except as stated in the Engagement Letter, the Client shall pay to PEI at its corporate office each invoice within 30 days of the date of the invoice without holdback. Interest at a rate of 1.5% per month or the maximum rate allowed by law, whichever is lower, may be charged on all overdue amounts.
- 1.11.2 In the event of a disputed billing, only the disputed portion will be withheld from payment, and the undisputed portion will be paid. The Client shall exercise reasonableness in disputing any bill or portion thereof. No interest will accrue on any disputed portion of the billing until mutually resolved.
- 1.11.3 If the Client fails to make payment of any sum due hereunder within a reasonable time period, Client acknowledges and agrees that the subject Invoice will be referred to legal collections, and any amount in aggregate less than Ten Thousand Dollars U.S. (\$10,000) will be referred to small claims court in Harris County, Texas.

### **1.12 Suspension or Termination**

The Client may at any time by notice in writing to PEI, suspend or terminate the Services or any portion thereof at any stage of the Project. Upon receipt of such written notice by the Client, PEI shall perform no further Services other than those reasonably necessary to close out its Services. In such an event, PEI shall invoice the Client for the portion of the Services completed and shall be entitled to payment in accordance with Section 1.9. Once the Services are completed the Client assumes the risk of Frustration of Purpose.

### **1.13 Insurance**

- 1.13.1 PEI agrees to carry and maintain the following **minimum** insurance coverages for the term of this Agreement:
  - Worker's Compensation Insurance: Statutory requirement amounts
  - Commercial General Liability: \$1,000,000 per occurrence
  - Automobile Liability Insurance: \$1,000,000 per occurrence for both owned and non-owned vehicles
  - Professional Liability and Contractors Professional Insurance: \$1,000,000 per occurrence
- 1.13.2 PEI's current Certificate of Insurance is provided with the Engagement Letter. If the Client requests to be a named as a certificate holder, this request must be made in writing to PEI prior to commencement of the Services.
- 1.13.3 PEI will renew the Professional Liability Insurance at or above the minimum coverage for period of two (2) years after completion of the Services.
- 1.13.4 If the Client requests that PEI increase the amount of insurance coverage or obtain other special insurance for the Project, PEI shall endeavor forthwith to obtain such increased or special insurance at the Client's expense.
- 1.13.5 Each of PEI and Client waive all claims, losses, damages and rights of recovery against the other to extent of the limits of coverage under any commercial general liability or property insurance policy actually obtained by a Party to this Agreement (or, in the case of PEI, to the extent obtained or required to be obtained by PEI under this Agreement). In addition, each Party shall exercise commercially reasonable efforts to cause to waive subrogation under its commercial general liability and property insurance policies and provide any necessary endorsements thereto.

### **1.14 Indemnity/Statute of Limitations.**

**EACH OF PEI AND CLIENT SHALL INDEMNIFY AND HOLD HARMLESS THE OTHER AND THEIR RESPECTIVE AGENTS, EMPLOYEES, SUCCESSORS AND ASSIGNS FROM AND AGAINST LEGAL LIABILITY FOR CLAIMS, LOSSES, DAMAGES, AND EXPENSES TO THE EXTENT SUCH CLAIMS, LOSSES, DAMAGES, OR EXPENSES ARE LEGALLY DETERMINED TO BE CAUSED BY THEIR NEGLIGENT ACTS, ERRORS, OR OMISSIONS. IN THE EVENT SUCH CLAIMS, LOSSES, DAMAGES, OR EXPENSES ARE LEGALLY DETERMINED TO BE CAUSED BY THE JOINT OR CONCURRENT NEGLIGENCE OF PEI AND CLIENT, THE PARTIES SHALL BEAR LIABILITY IN PROPORTION TO ITS OWN NEGLIGENCE UNDER COMPARATIVE FAULT PRINCIPLES. NEITHER PARTY SHALL HAVE A DUTY TO DEFEND THE OTHER PARTY, AND NO DUTY TO DEFEND IS HEREBY CREATED BY THIS INDEMNITY PROVISION AND SUCH DUTY IS EXPLICITLY WAIVED UNDER THIS AGREEMENT. CAUSES OF ACTION ARISING OUT OF PEI'S SERVICES OR THIS AGREEMENT, REGARDLESS OF CAUSE OR THE THEORY OF LIABILITY, INCLUDING NEGLIGENCE, INDEMNITY OR OTHER RECOVERY, SHALL BE DEEMED TO HAVE ACCRUED AND THE APPLICABLE STATUTE OF LIMITATIONS SHALL COMMENCE TO RUN NO LATER THAN THE DATE OF PEI'S SUBSTANTIAL COMPLETION OF SERVICES ON THE PROJECT.**

### **1.15 Limitation of Liability.**

- 1.15.1 Notwithstanding any other provisions contained herein, it is understood and agreed that PEI's liability to the Client for all claims arising out of this Agreement, or in any way relating to the Services, will be limited to direct damages and/or to the specific performance of any Services not meeting the Standard of Care set forth herein and such liability will, in the aggregate, not exceed the sum of the coverages shown on PEI's Certificate of Insurance in effect at the time of the claim.
- 1.15.2 No claim may be brought against PEI more than Two (2) years after the Services were completed under this Agreement, or as negotiated between PEI and the Client.

1.15.3. TO THE FULLEST EXTENT PERMITTED BY LAW, THE TOTAL AGGREGATE LIABILITY OF PEI (AND ITS DIRECTORS, EMPLOYEES, AGENTS AND AFFILIATES ) TO CLIENT AND THIRD PARTIES GRANTED RELIANCE IS LIMITED TO THE GREATER OF \$50,000 OR PEI'S FEE FOR ANY AND ALL INJURIES, DAMAGES, CLAIMS, LOSSES, OR EXPENSES (INCLUDING ATTORNEY AND EXPERT FEES) ARISING OUT OF PEI'S SERVICES OR THIS AGREEMENT. THIS LIMITATION SHALL APPLY REGARDLESS OF AVAILABLE PROFESSIONAL LIABILITY INSURANCE COVERAGE, CAUSE OR THE THEORY OF LIABILITY, INCLUDING NEGLIGENCE, INDEMNITY, OR OTHER RECOVERY; PROVIDED, HOWEVER, THAT THIS LIMITATION SHALL NOT APPLY TO THE EXTENT OF ANY AVAILABLE COVERAGE UNDER PEI'S COMMERCIAL GENERAL LIABILITY POLICY.

**1.16 Consequential Damages.**

EXCEPT AS EXPRESSLY PROVIDED IN THIS AGREEMENT, NEITHER PARTY SHALL BE LIABLE TO THE OTHER FOR LOSS OF PROFITS OR REVENUE, LOSS OF USE OR OPPORTUNITY, LOSS OF GOOD WILL, COST OF SUBSTITUTE FACILITIES, GOODS, OR SERVICES, COST OF CAPITAL, OR FOR ANY SPECIAL, CONSEQUENTIAL, INDIRECT, PUNITIVE, OR EXEMPLARY DAMAGES.

**1.17 Regulatory Reporting Requirements**

Client recognizes that hazardous substances or contaminants may be discovered at the subject property in the course of provision of the Services by PEI under conditions that may be reportable to Federal or State environmental regulatory agencies. The "duty to report" is ultimately the responsibility of the landowner unless the condition represents an acute threat to human health or the environment. PEI will notify the Client of any such reportable condition. The Client will notify the Landowner, or under mutual agreement, authorize PEI to perform such notification to the landowner.

**Section 2 – MISCELLANEOUS PROVISIONS**

**2.1 Notices:**

All notices under this Agreement shall be in writing. It shall be sufficient in all respects if the Notice is delivered by hand, sent by any electronic means, including email or facsimile transmission, with confirmation ("Transmission") during normal business hours, or sent by registered mail, postage prepaid, addressed to the Parties shown on the Engagement Letter or to such other address as either Party shall designate by written notice to the other Party. Any notice so given shall be deemed to have been given and to have been received on the day of delivery, if so delivered, on the third Business Day (excluding each day during which there exists any interruption of postal services due to strike, lockout or other cause) following the mailing thereof, if so mailed, and on the day that notice was sent by Transmission, provided such day is a Business Day (a Business Day being any day of the week save and except for Saturday and Sunday) and if not, on the first Business Day thereafter.

**2.2 Entire Agreement, Modifications, Headings, Severability:**

The Parties acknowledge that this Agreement and the Engagement Letter constitutes the entire agreement between them and supersedes all prior representations, warranties, agreements, and understandings, oral or written, between the Parties with respect to its subject matter. Unless stated otherwise in this Agreement, this Agreement may not be modified except in writing signed by both Parties. The headings to this Agreement are for convenience and reference purposes only and shall not constitute a part of the Agreement. If any element of this Agreement is later held to violate the law or a regulation, it shall be deemed void, and all remaining provisions shall continue in force.

**2.3 Effect:**

This Agreement shall be binding upon and inure to the benefit of the Parties hereto and their respective successors and assigns provided that it may not be assigned by either Party without the consent of the other, which consent shall not be unreasonably withheld.

**2.4 Survival:**

All representations and obligations (including without limitation the mutual obligations of indemnification) shall survive the termination of this Agreement and expire five (5) years from the date of completion of Services.

**2.5 Waiver of Rights:**

Any waiver of, or consent to depart from, the requirements of any provision of this Agreement shall be effective only if made in writing and signed by the Party granting such waiver or consent, and is valid only in the specific instance and for the specific purpose for which it has been granted. No failure on the part of any Party to exercise, and no delay in exercising, any right under this Agreement shall operate as a waiver of such right. No single or partial exercise of any such right shall preclude any other or further exercise of such right or the exercise of any other right.

**2.6 Applicable Law:**

This Agreement shall be governed by, and interpreted and enforced in accordance with, the laws in the State of Texas and the laws of The United States of America, as applicable.

**2.7 Dispute Resolution:**

Excepting Section 1.11 for the purpose of this Agreement, any disagreement arising between the Parties to this Agreement with reference to the interpretation of this Agreement or any matter arising hereunder and upon which the Parties cannot agree shall be referred to mediation. Reference to mediation shall be to a single mediator and in accordance with the laws of mediation in the State of Texas. The costs of the mediator shall be shared equally by the Parties on an interim basis as may be necessary provided however that the mediator shall have the discretion to award costs of the proceeding, including costs of the mediator. The venue for such mediation is agreed to be Harris County, Texas

**2.8 Contract Documents:**

The Contract Documents consist of the documents listed. If there is a conflict with the Contract Documents, the conflicting terms will be governed in the order of priority set forth as follows: 1. Agreement 2. Engagement Letter

**APPENDIX VII**

**STATEMENT OF QUALIFICATIONS**

**It is our goal to provide quality Environmental Site Assessments and Related Professional Services at a fair price within the clients' required delivery date.**



Since 1993 our in-house licensed and certified Environmental Professionals team continues to provide consistent quality, detailed attention to our client's requests, and full service environmental reports which set Phase Engineering, Inc. apart. Phase Engineering, Inc. has provided over 20,000 nationwide professional quality and timely Environmental Assessments and Property Condition Assessments for the private and public commercial real estate industries.

Whether you are a lender, a broker, an attorney, a buyer/seller, a property manager, a developer, or a property owner; ***Phase Engineering has the right service at the right price point*** for you. We work diligently to meet our clients timing and unique requirements. As any qualified Environmental Consultant knows, **Environmental Site Assessments are not created equal**. Phase Engineering is qualified to ensure your reports are done to the highest standards and regulations to help to protect the client's interest. Please check out our "**Dare to Compare**" website page for more **information on how you can qualify your environmental vendors**.

We pride ourselves in **keeping current our licenses and certifications** to give the client a more informed and educated solution. The following are among our company's licenses and certifications:

- **Professional Engineering Firm**
- **Professional Geoscientist Firm**
- **Licensed Asbestos Consultant Agency**
- **Licensed Mold Assessment Company**
- **Certified Lead Firm**
- **Leaking Petroleum Storage Tank (LPST) Corrective Action Specialist (CAS)**
- **Wetlands United States Army Corp of Engineers Delineation Course Certified**
- **Storm Water & Pollution Prevention Certified Preparer of SWPPP (CPSWPPP) and (CCIS)**
- **Radon**

Competitive Pricing. Consistent Quality. Common Sense.  
[www.PhaseEngineering.com](http://www.PhaseEngineering.com)

## **Professional Services**

The professional licensed and technical staff at Phase Engineering, Inc. are **annually involved nationwide in over 1000 environmental site assessments, Property Condition Assessments and related services. Our professional services include all aspects of the environmental due diligence for all types of commercial real estate clients.** Phase Engineering is qualified to ensure your reports are done to the highest standards and regulations to help to protect the client's interest. Phase Engineering, Inc. provides a full range of professional environmental services for the real estate transaction business world as listed below:

### **Environmental Site Assessments**

- Phase I Environmental Site Assessments include site assessments prepared to: EPA "All Appropriate Inquiries" (AAI) rule, Phase I Environmental Site Assessments as per ASTM Standard E 1527, Small Business Administration (SBA) SOP 50 10 5, etc..
- Client specific requirements such as Fannie Mae, FDIC, Freddie Mac, HUD, DHCA, NEPA, USDA, FDIC, TDHCA, Oil & Gas, etc.
- Transaction Screens per ASTM Standard E 1528
- Wetlands Determination, Delineations, Mitigation Plans, and Permitting
- Endangered Species Reviews
- Record Search with Risk Assessment Reports
- Desktop Reviews
- Environmental Data Services
- Prior Environmental Report Reviews (Third Party Reviews)

### **Phase II Environmental Site Assessments / Consulting**

- Phase II Environmental Site Assessments are specific to the nature of the project. A typical example is an investigation of an underground storage tank site. This requires sampling of soil and groundwater.
- Leaking Petroleum Storage Tank Corrective Action Project Management (CAPM) and Corrective Action Specialist (CAS) Services
- Voluntary Cleanup Program (VCP) (TCEQ) and (RRC) Consulting
- Innocent Owner Program (IOP) Consulting
- Resource Conservation and Recovery Act (RCRA) Corrective Action Site Project Management
- Dry Cleaning Remediation Program Consulting Services
- Vapor Assessments
- Municipal Settings Designation (MSD) Services
- Brownfields Site Assessment and Advisory Services
- Operation Cleanup Program (RRC) Consulting Services

### **Professional Services (continued)**

- Oil & Gas Due Diligence
- Underground Injection and Control (UIC) Permits and Registrations for Remediation Applications
- Remediation Feasibility, Design, and Implementation
- Monitoring and Post-Closure Care
- Groundwater Monitoring
- Prior Environmental Report Reviews
- RCRA Corrective Action Site Project Management
- Litigation Support

### **Waste Management and Compliance**

- Industrial and Hazardous Waste Registration, Permitting, and Reporting
- Waste Management Unit Closures

### **Building and Facilities Assessments**

- Property Condition Assessments per ASTM E 2018
- Asbestos Inspections, Management & Consulting
- Lead Based Paint and Lead in Water Inspections, Risk Assessments & Consulting
- Mold Assessments & Consulting
- Indoor Air Quality Assessments
- Storm Water Pollution Prevention (SWPPP) Plans, Audits & Inspections
- Spill Prevention, Control and Counter measure (SPCC) Plans
- Client Specific Compliance Services

## **Professional Services (continued)**

### **National Environmental Policy Act (NEPA)**

- Categorical Exclusions
- Environmental Assessments
- Housing and Urban Development (HUD) 24 CFR Part 58 Reviews (CDBG, HOME, NSP, Disaster Recovery, Public Housing Programs, etc.)
- Part 50 compliance – HUD Form 4128 Environmental Review Checklist
- USDA Rural Development Environmental Reviews per 7 CFR Part 1970 policies and procedures
- Federal Communications Commission (FCC) NEPA compliance for communication or transmission towers and facilities
- TxDOT NEPA compliance
- Section 106 Historic Preservation
- Noise Surveys and Mitigation
- Explosive Hazards Assessments
- Wetland Delineation and Mitigation
- HUD's 8-Step Decision-Making Process for Developing in a Floodplain or Wetland (24 CFR Part 55)
- Environmental Justice Assessments



## **Licenses & Certifications**

Phase Engineering, Inc. and the staff at Phase Engineering, Inc. are **licensed and certified** in all related areas to give the client a more informed and educated solution.

### **Registered Professional Engineering Firm**

### **Licensed Professional Geoscientist Firm**

#### **Asbestos**

- Consultant Agency
- Consultant
- Project Designer
- Management Planner
- Air Monitoring
- Inspector

#### **Indoor Air Quality**

- Mold Assessment Company
- Mold Assessment Consultant
- Mold Assessment Technician

#### **Lead**

- Lead Firm
- Risk Assessor
- Inspector

#### **Storage Tanks**

- Corrective Action Specialist (CAS)
- LPST Corrective Action Manager (CAPM)

#### **Wetlands**

- United States Army Corp of Engineers Delineation Course Certified

#### **Storm Water & Pollution Prevention**

- Certified Preparer of SWPPP (CPSWPPP) and (CCIS)

#### **Radon**

- Residential Radon Measurement Provider

## Recognized Associations

Keeping with the latest rules and regulations in the environmental field, Phase Engineering, Inc. and its staff are dedicated to current standards and legal issues by being involved with several professional associations:

- **ASTM** Committee Environmental Site Assessments for Commercial Real Estate Transactions & ASTM Phase II Task Force
- **ASTM** Teaching Staff - Phase I & Phase II Environmental Site Assessments
- Risk Management Association Board (**RMA**)
- Society of Wetland Scientists (**SWS**)
- Certified Commercial Investment Member (**CCIM**)
- Commercial Real Estate Women (**CREW**)
- Environmental Bankers Association (**EBA**)
- Houston Geological Society (**HGS**)
- Association of Commercial Real Estate Professionals (**ACRP**)
- Commercial Real Estate Network (**CREN**)
- Society of Industrial and Office Realtors (**SIOR**)
- Institute of Real Estate Management (**IREM**)
- Urban Land Institute (**ULI**)
- National Association of Government Guaranteed Lenders (**NAGGL**)
- Houston Association of Government Guaranteed Lenders (**HAGGL**)
- North Texas Association of Government Guaranteed Lenders (**NTAGGL**)
- Central Texas Association of Government Guaranteed Lenders (**CTAGGL**)
- El Paso Texas Association of Government Guaranteed Lenders (**EPAGGL**)
- Texas Bankers Association (**TBA**)
- Independent Bankers Association of Texas (**IBAT**)
- National Registry of Environmental Professionals (**NREP**)
- Texas Association of Environmental Professionals (**TAEP**)
- Commercial Real Estate Association of Montgomery County (**CREAM**)
- Houston Realty Business Coalition (**HRBC**)
- Texas Affiliation Of Affordable Housing Providers (**TAAHP**)
- **ASTM** Committee D18 on Soil and Rock, Subcommittee on Geospatial Technology
- Geological Association of America (**GSA**), South-Central Section, Environmental & Engineering Geology Division
- Houston Geological Society (**HGS**), Environmental and Engineering Group
- Urban and Regional Information Systems Association (**URISA**)

**Recognized Associations (continued)**

- Texas Association of Environmental Professionals (**TAEP**)
- Texas Association Professional Geoscientists (**TAPG**)
- Texas Board of Professional Geoscientists (**TBPG**)
- American Institute of Professional Geologists (**AIPG**), Texas Section, AIPG District IV – Southeast Texas

## Online Proposal Request

Our [online proposal request system](#) is designed with you in mind to streamline the proposal request process in order to efficiently and quickly get your proposal to you when submitted online by you.

**Your success is our success, and this online process helps expedite getting your project underway and completed on time.**

Proposal requests may be submitted online at [www.PhaseEngineering.com](http://www.PhaseEngineering.com).

1. Begin at our website at [www.PhaseEngineering.com](http://www.PhaseEngineering.com) to set up your own account.
2. At the bottom of the homepage, there is a section called "Request for Proposal". Below this heading (and below the log in username/password), you will see a link to create a "New user? Create an account here".
3. When you click on the link, your browser will take you to a new login page. On this page, you will see a section called "New Users".
4. Create your own username (preferably something that you will remember like your name [i.e. first initial and last name]) and your own password and insert your contact information.
5. Finally, click "Create Account".

Your account should be created, and you can go back to our homepage and order a proposal.

If you have any questions or comments, please contact Ruben Jauregui, Jr. at [Ruben@PhaseEngineering.com](mailto:Ruben@PhaseEngineering.com) or Melanie Edmundson at [Melanie@PhaseEngineering.com](mailto:Melanie@PhaseEngineering.com).

Phase Engineering's quoted delivery for completed Phase I Environmental Site Assessments is approximately two weeks. Phase Engineering, Inc. does realize that there are circumstances when the client needs results faster and will work to accommodate. Rush reports can be prepared in approximately one week with an added rush fee (rush delivery may result in data gaps due to time constraints).

All pricing and delivery of services is generally on a site specific basis depending on the scope of the assignment with the clients required guidelines.

Pricing differentials may apply for large acreage or difficult properties.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
6/30/2017

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> BancorpSouth Insurance Services, Inc. 3355 W Alabama Street Ste 850 Houston TX 77098	<b>CONTACT NAME:</b> Linda Terry, CIC, CISR, ACSR <b>PHONE (A/C, No, Ext):</b> 713-622-2330 <b>E-MAIL ADDRESS:</b> linda.terry@bxsi.com	<b>FAX (A/C, No):</b> 713-622-2053	
	<b>INSURER(S) AFFORDING COVERAGE</b>		
<b>INSURED</b> PHASENG-01 Phase Engineering, Inc 5524 Cornish Street Houston TX 77007	<b>INSURER A:</b> Rockhill Insurance Company		<b>NAIC #</b> 28053
	<b>INSURER B:</b> United Fire & Casualty Company		13021
	<b>INSURER C:</b>		
	<b>INSURER D:</b>		
	<b>INSURER E:</b>		

### COVERAGES

CERTIFICATE NUMBER: 562621696

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER: Deductible			ENVP010052-02	6/30/2017	6/30/2018	EACH OCCURRENCE \$3,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$50,000 MED EXP (Any one person) \$5,000 PERSONAL & ADV INJURY \$3,000,000 GENERAL AGGREGATE \$5,000,000 PRODUCTS - COMP/OP AGG \$5,000,000 Deductible \$25,000
B	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			12308113	6/30/2017	6/30/2018	COMBINED SINGLE LIMIT (Ea accident) \$1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$1,000,000 PROPERTY DAMAGE (Per accident) \$ \$
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A				<input type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
A	Professional Liab - Claims-Made & Pollution - Occurrence Form			ENVP010052-03	6/30/2017	6/30/2018	Each Occurrence \$2,000,000 Aggregate \$5,000,000 Deductible \$25,000


### DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

General liability policy includes a blanket additional insured endorsement when required by written contract but only with respect to liability arising out of a named insured's work for additional insured including Products/Completed Operations coverage and in no way will the additional insured status exceed the limits, terms or conditions of the policy. Primary & Non-Contributory wording is included when required by written contract, but only with respect to coverage provided by this policy.

Auto liability policy includes certificate holder as an additional insured when required by written contract but only with respect to the legal See Attached...

### CERTIFICATE HOLDER

### CANCELLATION

For Information Purposes Only	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE 
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**ADDITIONAL REMARKS SCHEDULE**

AGENCY BancorpSouth Insurance Services, Inc.		NAMED INSURED Phase Engineering, Inc 5524 Cornish Street Houston TX 77007	
POLICY NUMBER		EFFECTIVE DATE:	
CARRIER	NAIC CODE		

**ADDITIONAL REMARKS**

**THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,  
FORM NUMBER: 25      FORM TITLE: CERTIFICATE OF LIABILITY INSURANCE**

responsibility for acts or omissions of a person for whom liability coverage is afforded under this policy but in no event shall such coverage exceed the limits, terms or conditions of the policy.

General Liability, Pollution Liability and Auto Liability policies include waiver of subrogation in favor of certificate holder when required by written contract but in no event shall such coverage exceed the limits, terms or conditions of the policy.

General Liability, Professional Liability and Contractor's Pollution coverage is in a combined policy which carries a \$5,000,000 Total Policy Aggregate limit.

Professional Liability and Contractor's Pollution policy includes a blanket additional insured endorsement when required by written contract but only with respect to liability arising out of a named insured's work for additional insured including and in no way will the additional insured status exceed the limits, terms or conditions of the policy.

30 Day Notice of Cancellation is provided when required by written contract except in the event of cancellation for Non-Payment of Premium under the Auto policy.

All coverages shown are subject to the Terms, Conditions and Exclusions of the policies.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

06/30/17

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Aon Risk Services, Inc of Florida 1001 Brickell Bay Drive, Suite #1100 Miami, FL 33131-4937	<b>CONTACT NAME:</b> Aon Risk Services, Inc of Florida	
	<b>PHONE (A/C, No, Ext):</b> 800-743-8130	<b>FAX (A/C, No):</b> 800-522-7514
<b>EMAIL ADDRESS:</b> ADP.COI.Center@Aon.com		
<b>INSURER(S) AFFORDING COVERAGE</b>		<b>NAIC #</b>
<b>INSURER A :</b> New Hampshire Ins Co		23841
<b>INSURER B :</b>		
<b>INSURER C :</b>		
<b>INSURER D :</b>		
<b>INSURER E :</b>		
<b>INSURER F :</b>		

<b>INSURED</b> ADP TotalSource FL XIX, Inc. 10200 Sunset Drive Miami, FL 33173 ALTERNATE EMPLOYER Phase Engineering Inc 5524 Cornish Street Houston, TX 77007	<b>INSURER B :</b>	
	<b>INSURER C :</b>	
<b>INSURER D :</b>		
<b>INSURER E :</b>		
<b>INSURER F :</b>		

**COVERAGES** **CERTIFICATE NUMBER:** 1656249 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS. **LIMITS SHOWN ARE AS REQUESTED.**

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
	<b>COMMERCIAL GENERAL LIABILITY</b> <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER						EACH OCCURRENCE	\$
							DAMAGE TO RENTED PREMISES (Ea occurrence)	\$
							MED EXP (Any one person)	\$
							PERSONAL & ADV INJURY	\$
							GENERAL AGGREGATE	\$
							PRODUCTS - COMP/OP AGG	\$
								\$
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident)	\$
							BODILY INJURY (Per person)	\$
							BODILY INJURY (Per accident)	\$
							PROPERTY DAMAGE (Per accident)	\$
								\$
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DEC <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE	\$
							AGGREGATE	\$
								\$
A	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input type="checkbox"/> Y / N <b>(Mandatory in NH)</b> If yes, describe under DESCRIPTION OF OPERATIONS below		N / A	WC 026160333 TX	07/01/17	07/01/18	<input checked="" type="checkbox"/> PER STATUTE	<input type="checkbox"/> OTHER
							E.L. EACH ACCIDENT	\$ 2,000,000
							E.L. DISEASE - EA EMPLOYEE	\$ 2,000,000
							E.L. DISEASE - POLICY LIMIT	\$ 2,000,000

**DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)**  
 All worksite employees working for PHASE ENGINEERING INC, paid under ADP TOTALSOURCE, INC.'s payroll, are covered under the above stated policy. PHASE ENGINEERING INC is an alternate employer under this policy.

<b>CERTIFICATE HOLDER</b>  Phase Engineering Inc 5524 Cornish Street Houston, TX 77007	<b>CANCELLATION</b>  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE  <i>Aon Risk Services, Inc of Florida</i>



**Thomas Buechele**  
**Staff Environmental Scientist**

**Professional Experience**

Mr. Buechele is a technical writer and staff environmental scientist for Phase Engineering, Inc. Over the last 3 years, he has co-written, conducted research for and performed quality control on over 3,000 Phase I Environmental Site Assessment (ESAs). Mr. Buechele is experienced in fulfilling both scope and non-scope requirements for standard ESAs as well as those for the Texas Department of Housing and Community Affairs (TDHCA). In his work, Mr. Buechele has also researched numerous Phase II ESAs and petroleum storage tank (PST) / leaking petroleum storage tank (LPST) projects.

**Licenses/Certifications**

- 24-Hour OSHA (HAZWOPER)

**Education**

- B.S. Bioenvironmental Science, Texas A&M University, College Station, TX





## **Zahir Jamal**

### **Senior Staff Environmental Scientist**

#### **Professional Experience**

Mr. Zahir Jamal is a Professional Environmental Project Manager for Phase Engineering, Inc. Over the last 20 years, he has conducted and /or managed over 10,000 Phase I Environmental Site Assessment (ESAs) and Phase II Environmental Site Assessment (ESAs)

#### **Licenses/Certifications**

- 40-Hour OSHA (HAZWOPER)

#### **Education**

- B.E. (Bachelor of Engineering) N E D University, Karachi, Pakistan
- M.S. Environmental Engineer, University of Windsor, Windsor, Canada

#### **Select Project Experience**

**City of Houston, Houston, TX:** Performed subsurface investigations at several City of Houston owned properties that had underground storage tanks (USTs). For facilities where the USTs were determined to be leaking, performed investigations to determine the extent of affected soil and /or groundwater.

Performed Phase II site remediation which included geoprobe boring installations, soil and groundwater sampling for analysis, and soil bioremediation to reduce total petroleum hydrocarbon (TPH) contamination.

**Private and Industrial Clients:** Performed several Phase I Environmental Site Assessment (ESAs) involving field investigations and report writing.



## Janis Franklin, PG

### Environmental Program Manager/Due Diligence Services

#### Professional Experience

Ms. Franklin is a Professional Geoscientist and Senior Project Manager for Phase Engineering, Inc. Over the last 25 years, she has conducted and /or managed over 12,000 Phase I Environmental Site Assessment (ESAs), 1,200 Phase II ESAs, over 200 petroleum storage tank (PST)/leaking petroleum storage tank (LPST) related projects and over 50 projects under regulatory oversight in multiple programs including the Superfund, Voluntary Cleanup Program (VCP) and Petroleum Storage Tank (PST) Program.

#### Licenses/Certifications

- Asbestos Inspector (Texas), License #603137
- Lead Inspector (Texas), #206233
- Corrective Action Project Manager CAPM #01209
- 40-Hour OSHA (HAZWOPER)
- Professional Geologist (Tennessee), License #TN4132
- Professional Geologist (Texas), License #1254

#### Education

- B.S. Geology, Austin Peay State University, Clarksville, TN
- M.S. Environmental Management, University of Houston, Clear Lake

#### Select Project Experience

**University of Houston, Houston, TX:** Performed subsurface investigations at several University owned properties that had underground storage tanks (USTs). For facilities where the USTs were determined to be leaking, performed investigations to determine the extent of affected soil and /or groundwater. Designed and implemented risk-based assessment plans. Prepared reimbursement packages and related documentation for submittal to the Texas Commission of Environmental Quality (TCEQ).

**City of Houston:** Involved in the implementation of city-wide investigation and corrective action for the City of Houston UST Program. Performed investigations at fire station and vehicle maintenance facilities at several sites throughout the city. Successfully prepared and presented risk-based assessment plans to the TCEQ.

**WEF Ltd.:** Performed Phase II site remediation which included geoprobe boring installations, soil and groundwater sampling for analysis, and soil bioremediation to reduce total petroleum hydrocarbon (TPH) contamination.

**TCEQ, South:** Involved in the implementation of Site Assessment Program tasks through approved work plans submitted to the Superfund, PST and VCP Divisions. Performed investigations at over 50 sites throughout south Texas.

**Texas Parks and Wildlife, La Porte, TX:** Managed a Scope of Work that included wastewater treatment plant sludge, soil and decontamination confirmation wipe sampling for analysis. Coordinated the decontamination and waste disposal activities.

**Suiza Foods, Southwest:** Developed stormwater pollution prevention plan for dairies in Louisiana and Texas. Prepared Notice of Intent (NOI) permits for the discharge of stormwater and submitted to the Louisiana Department of Environmental Quality (LDEQ) and/or Environmental Protection Agency (EPA). In addition, developed Storm

Water Pollution Protection Plans (SWPPP) and Spill Prevention, Control and Countermeasure (SPCC) plan protocols for use at all Suiza dairies.

**United States Postal Service, Nationwide:** Scope of Work included NEPA Environmental Assessments of properties in accordance with expansion and /or new construction requirements. Additional investigation and remediation work was authorized for properties with suspected environmental impairment.



## **Sheila Aslani**

### **Staff Environmental Scientist**

#### **Professional Experience**

Ms. Aslani is an Environmental Scientist and Research Analyst for Phase Engineering, Inc. Her time is used in the research department conducting analyses on Environmental Data Risk Reviews (EDRRs), Record Search with Risk Assessment (RSRAs), and Phase I Environmental Site Assessments (ESAs).

#### **Education**

- B.S. Environmental Science, University of St. Thomas, Houston, TX

#### **Select Project Experience**

**University of St. Thomas, Houston, TX:** Completed a Bachelor's Thesis on Water Quality Analysis of Japhet Creek Linear Park. Tested the water quality of the area in question and formulated a written report of all the findings. Utilized the Texas Commission of Environmental Quality (TCEQ) rules and regulations to determine whether the area was contaminated or not.

# **APPENDIX VIII**

## **REFERENCE SOURCES**

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## REFERENCE SOURCES

- ASTM Practice E 1527-13.
- Site Sketch Maps: <http://services.arcgisonline.com/arcgis/services>.
- Aerial Photographs: USDA AFPO NAIP ArcGIS Service of NC Imagery <http://gis.apfo.usda.gov/arcgis/services>, USDA NRCS Geospatial Data Gateway <http://datagateway.nrcs.usda.gov>, TNRIIS Web Mapping Services <http://www.tnris.org/wms> and USGS Earth Explorer, <http://edcsns17.cr.usgs.gov/EarthExplorer>.
- Geologic Database of Texas compiled by the USGS, TWDB, BEG (2007) <http://www.tnris.state.tx.us/datadownload/download.jsp>, and Geologic Units in Texas USGS Mineral Resources On-line Spatial Data <http://tin.er.usgs.gov/geology/state/fips-unit.php?state=TX>.
- U.S. Geologic Survey Topographic Maps: USGS Earth Explorer <http://edcsns17.cr.usgs.gov/EarthExplorer>, The National Map-Historical USGS Topographic Map Collection <http://nationalmap.gov/historical/>, and University of Texas Perry-Castañeda Library Map Collection, Historical Topographic Maps, [http://www.lib.utexas.edu/maps/map\\_sites/hist\\_sites.html#US](http://www.lib.utexas.edu/maps/map_sites/hist_sites.html#US)
- Soil Survey Staff. The Gridded Soil Survey Geographic (SSURGO) Database for Texas. United States Department of Agriculture, Natural Resources Conservation Service. Available online at <http://datagateway.nrcs.usda.gov/>. July 9, 2015 (FY2014 official release).
- Texas Major & Minor Aquifers Geodatabase (Updated December, 2006): Texas Water Development Board (TWDB) GIS Data, <http://www.twdb.state.tx.us/mapping/gisdata>
- Texas Major & Minor Aquifers Geodatabase (Updated October, 2013): Texas Water Development Board (TWDB) GIS Data, <http://www.twdb.state.tx.us/mapping/gisdata>.
- FEMA NFHL (National Flood Hazard Layer) Web Map Service (WMS) <https://hazards.fema.gov/gis/nfhl/services>.
- The Railroad Commission of Texas, Geographic Information System – Oil and Gas Well Digital Data Acquisition. Oil and gas well data and pipeline data were obtained from public records at the Railroad Commission of Texas (the Commission). <http://www.rrc.state.tx.us>.
- Groundwater Database and Submitted Drillers Reports Database from the (TWDB) Texas Water Development Board, GIS Data, <http://www.twdb.state.tx.us/mapping/gisdata> and [http://www.twdb.state.tx.us/gwrd/waterwell/well\\_info](http://www.twdb.state.tx.us/gwrd/waterwell/well_info), US Geological Survey NWIS Site Inventory for Texas: <http://nwis.waterdata.usgs.gov/nwis/inventory>, and Public Water System Wells, TCEQ GIS Data: <http://www.tceq.texas.gov/gis>.
- Certified Sanborn Map Report from Environmental Data Resources, Inc., 440 Wheelers Farms Road, Milford, Connecticut 06461
- AAI Environmental Data, 5524 Cornish Street, Houston, Texas 77007, <http://aaidata.com/>
- Texas Commission on Environmental Quality (TCEQ) Central Registry Database Search <http://www12.tceq.state.tx.us/crpub/>
- EPA Envirofacts Warehouse, <http://www.epa.gov/enviro/facts/qmr.html>
- EPA Enforcement & Compliance History Online (ECHO) <http://www.epa-echo.gov/echo>