

AtlanticRichfieldCompany

Legs.
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Hazel R. Hoffman
Senior Attorney

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SUPERFUND BRANCH



December 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Larry Thomas (6AW-SW)
U. S. Environmental Protection Agency
1201 Elm Street
First International Building
Dallas, Texas 75270

Re: French Limited CERCLA Site
Our File No. HX58-10-46

Dear Mr. Thomas:

This submittal is made in response to your recent telephone request for additional information. It is my understanding that the Environmental Protection Agency (EPA) requires such information as a prerequisite to the issuance of requests for information pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). The information accompanying this letter relates to certain companies (1) whose names do not appear in the French Limited Accounts Receivable Journal which was supplied to the Department of Justice pursuant to its request for documents and (2) which have not already received CERCLA §104(e) inquiries from your office.

What appears on the following pages is a compilation of certain information obtained from recent interviews of three former employees of French Limited of Houston, Inc. Since the Journal only covers a period of fifteen months, we assume that references to these companies, whose names do not appear in the Journal, relate to activities which took place from 1966 through 1969.

The interviewees were managers who had personal knowledge that the type of work they described was actually done. Generally it was their job to acquire clients and/or supervise the work. Sometimes they participated in some manner in the loading or unloading operations; but generally they only went to the customer's site to make

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Mr. Larry Thomas
December 26, 1984
Page Two

sure that the loading was being done. Often they accompanied the truck drivers back to the French Limited site. Therefore they often saw first-hand whether the material went into the pond (lagoon) at the Highway 90 site or was placed into nolding tanks.

We believe that these men are credible.

If you have any questions about how the attached was compiled I shall be pleased to answer them. I participated in the interviews of each of these ex-employees of French Limited of Houston, Inc. What appears in the attachments is compiled from my notes on the interviews and relates only to the pertinent information about each of the named companies.

This submittal is being made in my capacity as Chairman of the Steering Committee of the French Limited Task Group and on behalf of the Task Group in the hope that it will provide the sort of information which will be helpful to the Environmental Protection Agency in its attempt to resolve any problems which may exist at the French Limited site.

Yours truly,


Hazel R. Hoffman

HRH:ac

Enclosures

000971

American Plant Food Corporation
903 Mayo Shell Road
Houston, Texas 77546

This fertilizer company sits on approximately 10 acres in Galena Park. They were serviced on a callout basis, at a minimum of twice a year. Therefore the volume was not great. However, the material which was sent to French Limited was generally corrosive in nature, in that it ate hoses and fittings and valves. It consisted mostly of acids that were water soluble - like sulfuric acid and HCl. The material was picked up out of earthen pits on the site. In addition material was taken from an old wooden tank. Generally the material was sludge.

Usually a 100-barrel load was picked up every few months for at least a period of three to four years.

000972

C. Brewer Terminals, Inc.
P. O. Box 557
Willow Grove, Pennsylvania 19090

Attention: Arthur P. Goldenberg
(Formerly known as Southwestern Molasses)

At an early date in the history of French Limited this company provided material from a gasoline or a diesel spill. Four or five truck-loads of material were taken to the pond on a 130-barrel truck. The plant was off 75th Street near the site of Marine Maintenance.

000973

Coastal Corporation
9 Greenway Plaza
Houston, Texas 77046

Attention: Keith Pardue

(Formerly known as Coastal States Gas)

This Coastal was a pipe line company whose main office was in Corpus Christi. The connection with French Limited was a one-time job during which a couple of tanks at metering stations were cleaned out. This metering station was at Highway 6 south of Sugar Land toward Arcola. The pickup place was between Route 288 and Sugar Land near what is now Sugar Creek. The material which was brought to the French Limited Site came from two 55,000-barrel tanks. It is believed that the current company operating the metering station to which the above refers is Coastal States Crude Gathering Company, Almeda Station. The person to contact there is Pete Turner, whose telephone number is 877-6433.

In 1968 the telephone number for Coastal States Gas in Houston was CA-4-9961; in Corpus Christi the telephone number was (512) TU-3-5211; in Lafayette, Louisiana the phone number was (318) 232-7616, and a Mr. Graves was the contact there. The same company had another metering station on Route 225 near the ARCO Refinery. Their trucks were white pickups with green decals which said "Coastal States" on them. The Company may have been known to French Limited as Coastal States Gas Prod. Co.

000974

Continental-Emsco Company
P. O. Box 1522
Houston, Texas 77251

This company may have been mixed up by the interviewees
with Southwest Galvanizing, since the latter company was begun
by two ex-employees of Continental-Emsco.

000976

Crown Central Petroleum Corporation
P. O. Box 1759
Houston, Texas 77251

(Formerly known as Crown Oil Company)

This site was near the Pasadena Tunnel and material taken from this site went directly to the pit. At least three jobs are remembered. They represented once-a-year cleanout jobs. Each time a cleaning was done 50 to 60 loads on 50-barrel trucks were sent to the site. The materials were tank bottoms and mud from API separators. The contacts there were Mr. Manley, Mr. Van Wagner, Pete Peterson and J. D. Trucksall, the purchasing agent.

000977

Dixie Oil Processors, Inc.
P. O. Box 856
Friendswood, Texas 77546

Attention: James Appell

This plant was also known as Lowe Chemical Company. It had styrene polymer and copper catalyst residue at its plant site. In fact it is remembered Mr. Ralph Lowe was charged for a vacuum tank which was eaten up by the copper catalyst from his plant site in Friendswood.

Some of the old sumps behind the plant were cleaned out and the material was brought to the pond at French. Fifty-barrel vacuum trucks were used to haul the material. There generally were one or two loads at a time. But the frequency was not often. It is estimated that about five such jobs were taken to the pond. The material phased out when they dug the pits at their Friendswood plant.

The material which was taken to the pond at French Limited stretched French Limited's hoses. It is particularly remembered that a kettle furnace on the east side of the plant had a sump around it which was cleaned out.

000978

The Groce Company
P. O. Box 34605
Houston, Texas 77034

Att: Mr. Gary Staton

This is a private carrier which was allowed to use the French pit for a while. It disposed of water soluble oils from machine shops around town. The material went to the pond if this water had no oily residue which could be recovered. It is estimated that a total of 500 barrels carried by the Groce Company went to the pits.

000979

Hurricane Industrial Fence
9600 Old Katy Road
Houston, Texas 77055

This plant was called on approximately once a month from the time the French Limited pond opened. It is located off Washington Avenue. The interviewees personally called on Travis McDonald whose phone number had a University prefix. This company was also in a boat business which was housed in a building next door to the fence company site. The material taken from this site went into the pond. It was mainly spent acids from the galvanizing dip. Vats were cleaned approximately one time per month. Each time the job was done 10 to 20 loads were taken to the pond. A 50-barrel bobtail truck was used because the area was too small for a larger truck. These jobs were done for two to three years. In particular it is remembered that the drivers who handled this job were Ellis and Collins. For some reason business stopped in the 70's and material was evidently taken somewhere else.

086000

J. M. Huber Corporation
2000 West Loop South
Houston, Texas 77056

Attention: Pat Miller, Esq.

The material taken from this Greens Bayou site off Highway I-10 was in the nature of waste carbons which were taken from this plant two or three times a week for at least a six to eight month period. The material was deposited in the French Limited pond. It may have been ink. This site was near Jolander and I-10 in back of Gulf in Baytown.

000981

Marathon Manufacturing Corporation
600 Jefferson, 19th Floor
Houston, Texas 77002

Attention: S. Maria Narisi, Esq.

(Formerly known as Richmond Tank Car)

This job was done a couple of times a year on a "call" basis. The site is on old Highway 90 at Sheldon Road. The materials taken to the pond at French came from a sump which held water used to wash out tank cars. Generally this wash water and pit materials from the sump were transported in a 50-barrel truck.

000932

Olin Corporaton
120 Long Ridge Road
Stamford, Connecticut 06904

Attention: Myron B. Sokolowski, Esq.

Re: Mathieson Chemical Company

This was a fertilizer business which later became part of Olin Mathieson. Material was cleaned out of sumps and separators and taken directly to the pond two times. The amount taken each time was approximately 100 barrels.

000983

Platzer Shipyard
P. O. Box 24399
Houston, Texas 77035

Attention: Neal Platzer

Generally barge bottoms were transported to French Limited and tanked for purposes of reclamation. Approximately 50% was reclaimed. The balance went to the pond. In addition heavy asphalts were dumped into the pond. Generally a 130-barrel transport truck was used on a callout basis. The contact at Platzer Shipyard was Van Wagner at GL-3-7251.

000984

Reichhold Chemical, Inc.
R.C.I. Building
525 North Broadway
White Plains, New York 10602

Attention: Paul E. Dixon

Re: R.C.I.

This company was located near Stauffer off Haden Road. Sumps were cleaned of sludges. A bobtailed truck was used two or three times by one employee to clean these sumps.

Another employee remembered a gummy hard-to-handle substance which was loaded hot and was hard to get out of the trucks. This material was picked up once a week in a 100-barrel truck for a period of five or six months. It was like a paste or a glue, and the recollection is that it came from some sort of plastic operation and was taken to the pond. Since it was so hard to handle French Limited stopped handling it after approximately six months.

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Rohm & Haas Company
Independence Mall West
Philadelphia, Pennsylvania 19105

Attention: Ellen Friedell, Esq.

It is remembered that French Limited trucks and drivers hauled a bit of everything that Rohm & Haas made at their plant. One ex-employee remembers a certain job that was done by a driver and a helper in a 50-barrel truck once every week at 2:00 A.M. This was a routine job during which kettle bottoms were sucked out of a tower which had a valve at its bottom. The material was sticky and gummy and was taken to the pond at French Limited. This job is remembered because (1) most drivers did not like to have to make the trip at 2:00 o'clock in the morning, and (2) it was a messy job. A particular recollection is that a man was fired because he didn't want to make that trip. The purchasing agent at Rohm & Haas was named David Leek.

Another ex-employee of French remembers taking a few loads to the Highway 90 site from Rohm & Haas. He doesn't know what the material was, but he does remember going into the plant at the South Main gate. The unit in question was two blocks east of the gate, off Highway 225. The material was contained in vessels. It was picked up in 50-barrel trucks and had a very bad odor, which was in the nature of a chemical smell. A cigarette which was exposed to the odor would taste sweet even two days later. Various drivers serviced the account, including Bruce Roland, Joe Garcia, B. G. Collins and Jules Simean. A load of this particular material was taken from vessels to the French Limited pond every couple of weeks.

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Smith Industries
P. O. Box 7383
Houston, Texas 77248

This company was a galvanizer. The frequency of service is not remembered. However, the plant was off Old Katy Freeway; and the recollection is that ten or eleven loads per call were picked up a couple of times a month. The material consisted of spent acids and caustics which were taken to the pond (probably from a hot dip operation).

000987

Southline Metal Products Company
P. O. Box 19526
Houston, TX 77224

Att: W. F. Wackman, President

(Formerly known as Southline Drums)

Southline Drums - The location of this company was on the north side of I-10 inside the Loop. The material which was picked up was waste varnish. The material was picked up regularly in 100-barrel trucks at the rate of two or three loads per year over a two or three year period.

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St. Regis Corporation
237 Park Avenue
New York, New York 10017

Attention: Lee Rettig, Esq.

Re: Southland Paper Company

This company is located on Highway 90 on the west bank of the San Jacinto River. The job is remembered because the material was taken from giant cement tanks. In particular, it is remembered that these large cement clarifiers were well over 100 feet in diameter. The recollection is that the pulp in Southland Paper Company's operation got so thick that the arm on this clarifier would break and the clarifier would have to be cleaned out periodically. The material cleaned out was pulp and biological "bugs". Some caustic water was also cleaned out. The first time this job was done the material was left at the plant site. After that it was taken to the pond. The jobs were around the clock, 24-hour a day jobs which consisted of at least 500 loads each job, in 50-barrel trucks. In addition some pup trailers and some 130-barrel truck loads would be taken each time. The jobs lasted four or five days. All the material went to the pit from at least three jobs of this kind.

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Stauffer Chemical Company
Nyala Farm Road
Westport, Connecticut 06880

Attention: Thomas J. Sayers

This is a plant on Manchester Road. Spent acids and sludges which were acidic in nature came from the plant. Each time the acid sludge pit was cleaned out two or three loads were taken to the French Limited pond. This job was done every couple of months to keep the pit from overflowing into the ship channel; however, the pit was never completely cleaned out. The sludges were semi-solid in nature and greyish in color, and were stored in 50-barrel tanks. The drivers which went to that site were Ellis, Collins, Vareka and Legg.

This was an early account which was gotten by Joe French when the site was first opened in 1966.

In addition, there was a plant on the north side of the channel which was also serviced. This was a small plant, whereas the one on Manchester Road near 610 was a rather large plant.

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Texaco, Inc.
P. O. Box 52332
Houston, Texas 77052

Attention: J. Samuel Listiak, Esq.

Re: Texaco and Neches Butane Products Company

1. The Texaco plant at Port Arthur was serviced regularly by the driver, Tommy Legg. Scale and washwater from leaded gasoline was taken back to the Highway 90 site in 100-barrel trucks. It went to the pond.

In particular it is remembered that Luther Boatright handled pipeline and tank cleaning operations related to the Port Arthur service. The pipeline virgin crude was 40% to 50% reclaimed, with the balance going to the pond. Tank bottoms generally went to the pond.

2. Tanks at Clinton Drive in Galena Park were cleaned out. Specifically five tanks were cleaned on one job at Clinton Drive. In addition, tanks near Wallisville Road and the Southern Pacific Railroad, which were probably 55,000-barrel tanks, were cleaned out. There were three or four tanks at that site and it is particularly remembered that they had to be squeegeed out by French Limited personnel. All the materials from these tanks went to the pond.

3. In addition, material came to French from Neches Butane in the Beaumont area. This material was generally

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(Texaco, Inc. - Page 2)

red styrene tars, and it came from Beaumont in 100-barrel trucks. A man named "Red" drove Dixie Vacuum trucks from Beaumont. Generally 300 to 500 barrels per month came over regularly from Neches Butane in Beaumont via Dixie. The pusher in Beaumont was a Mr. Mott, who now works for Luther Hinden in Beaumont. All this material from Beaumont went to the pit at the French Highway 90 site. It had an offensive odor.

000992

Western Commercial Transport, Inc.
440 18th Street
Beaumont, Texas 77707

Attention: Lamar Green

Material from Sugar Land, which was in the nature of trailer washings, came from this private carrier. When this company cleaned its trailers the trailer washings went to a sump. French cleaned out the sump a few times. A 50-barrel load came in each time a cleaning was done. The material went to the pond.

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