NPL Site Narrative for Conroe Creosoting Company

CONROE CREOSOTING COMPANY Conroe, Texas

Conditions at Proposal (April 30, 2003): The Conroe Creosoting Company facility occupies 147 acres in Conroe, Texas. Conroe Creosoting Company was a wood treating facility that operated from 1946 until March 14, 1997. The facility treated lumber, railroad cross-ties, poles, and fence posts. Three wood preserving processes, pentachlorophenol (PCP) process, creosote process, and copper chromated arsenate (CCA) process, were used at the facility. The facility was closed by the Montgomery County Tax Assessor/Collector due to delinquent taxes and the county sold the company's assets at an auction. The land and waste management and process units remained property of the owners. The site is being proposed to the NPL because elevated levels of pentachlorophenol (PCP), dioxins, polycyclic aromatic hydrocarbons (PAHs), and metals have been found in on-site soils, surface water, waste drums, and surface impoundments, threatening nearby residents, wetlands, and rivers. The property has been flooded three times since 1994, sending contaminated flood waters into nearby residential homes and yards.

Surface impoundments containing creosote waste currently drain off-site via drainage canals. Runoff from the site flows overland both to the east to Little Caney Creek and to the west to Stewarts Creek. In June 2001, a waste inventory listed several cylinders and tanks containing copper chromated arsenate solution, creosote sludge, pentachlorophenol solutions and solids, and tank bottoms. The total quantity of hazardous waste in the tanks and containers other than drums was estimated to be over 100,000 gallons. Approximately sixty-two (62) overpacked drums in poor condition were stored in an on-site shed.

Texas Commission on Environmental Quality (TCEQ, formerly Texas Natural Resource Conservation Commission) conducted several compliance investigations at the company during the 1980s and 1990s. Violations documented at the site resulted in the issuance of Agreed Orders in 1994 and 1999. Sampling by Conroe Creosoting Company in September of 1996 indicated elevated levels of creosote compounds, including arsenic, chromium, and copper in soil and shallow groundwater. In March 2001, TCEQ observed contents leaking out of containers. During a November 2001 expanded site investigation, TCEQ uncovered a hazardous waste dumping area onsite, and detected creosote-related hazardous substances in soils and sediments. Soil samples collected on-site revealed concentrations of dioxins 100 times the EPA's action level of 1 ppb. Soil and sediment samples from creeks downstream of the site indicate concentrations of arsenic as high as 14.2 ppm, copper as high as 10.0 ppm, chromium as high as 17.7 ppm, and several semi volatile organic compounds, including fluoranthene as high as 4,600 ppb, pyrene as high as 1,000 ppb, and phenanthrene as high as 1,500 ppb.

EPA conducted a removal assessment of the facility in January 2002. Tanks, cylinders, impoundments, drums, and soils were sampled and analyzed for volatile organic compounds, semi-volatile organic compounds, and metals. In addition, five soil samples were analyzed for dioxins and furans. Over 500,000 gallons of liquid, sludge, and contaminated water were identified during the assessment, and approximately 65,000 cubic yards of soils were found to exceed the EPA Region 6 Screening Guidance for either arsenic, chromium, pentachlorophenol, total creosote compounds, or dioxin and furans. An ongoing EPA removal action is addressing on-site process areas, contaminated soil and sediment.

Two residential neighborhoods are located immediately downstream on Stewart's Creek, within the 100 year flood plain. These homes have been subject to at least three severe flood events (water in their homes) since 1994. Any large rain event will cause Stewart's Creek to flood, sending contaminated water into the yards of residents who border the creek. Surface water from the facility eventually enters the West Fork San Jacinto River, which is a small to moderate stream and is a fishery. A wetland is located along the banks of Stewarts Creek. Analytical results of samples collected from the wetland area document contamination attributable to the facility.

Status (September 2003): EPA is considering various alternatives for this site.

For more information about the hazardous substances identified in this narrative summary, including general information regarding the effects of exposure to these substances on human health, please see the Agency for Toxic Substances and Disease Registry (ATSDR) ToxFAQs. ATSDR ToxFAQs can be found on the Internet at ATSDR - ToxFAQs (http://www.atsdr.cdc.gov/toxfaqs/index.asp) or by telephone at 1-888-42-ATSDR or 1-888-422-8737.