FIVE YEAR REVIEW

PESSES CHEMICAL COMPANY

SUPERFUND SITE

FORT WORTH, TEXAS

JUNE 2000

PESSES CHEMICAL COMPANY
SUPERFUND SITE
FIVE YEAR REVIEW
JUNE, 2000

INTRODUCTION

Authority

The U.S. Environmental Protection Agency (EPA) Region 6 conducted this review pursuant to Section 121 (c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Oil and Hazardous Substances Contingency Plan (NCP) Section 300.430(f)(4)(ii), and the Office of Solid Waste and Emergency Response (OSWER) Directives: 9355.7-03A "Second Supplemental Five-year Review Guidance," 9355.7-02A "Supplemental Five-year Review Guidance," and 9355.7-02 "Structure and Components of Five-year Reviews." This review will become part of the Site file at Region 6 EPA offices in Dallas, Texas, and the Texas Natural Resource Conservation Commission offices in Austin, Texas.

Site Characteristics

The Site is located at 2301 South Main Street, Fort Worth, Tarrant County, Texas. The Site is in a light industrial and commercial area two miles south of downtown Fort Worth and one-half mile west of Interstate 35W. Approximately 19,500 people live or work within one mile of the Site. A railroad yard borders the east side of the Site. Figure 1 shows the location of the Site. Figure 2 provides details of the Site.

Site History

The 4.2 acre Site was used to reclaim cadmium and nickel from dry-cell batteries and metal sludge. The Pesses Company, under the name Pesses S'West, conducted metal reclaiming activities from batteries from approximately June 1979 until January 1981. In March 1983, a grass fire at the Site released toxic fumes.

In April 1983, the EPA removed 3,400 cubic yards of contaminated soil, metal sludge, drummed material, and debris from the Site and shipped the waste to Chemical Waste Management, in Port Arthur, Texas. The Site was proposed for inclusion on the CERCLA National Priorities List (NPL) on October 15, 1984, (49 *Fed. Reg.* 40320) with a score of 28.86, due mainly to the potential for migration of heavy metals via airborne dust and surface water runoff from the Site. The Site was placed on the NPL on June 10, 1986, (51 Fed. Reg. 21054). The EPA designated the Texas Water Commission, predecessor to the Texas Natural Resource Conservation Commission (TNRCC), as the lead agency for remedial activities for the Site. The Remedial Investigation/Feasibility Study (RI/FS) was performed between December 1987 and October 1988. An imminent public health threat was alleviated by the EPA Region 6 Emergency Response Team through a removal action conducted in April 1983. Nevertheless, the RI determined that the residual contamination of cadmium and nickel present in the soils (to a depth of two to three feet over most of the Site), in the metal warehouse, and in process equipment posed health and environmental threats requiring remediation. Concentrations of cadmium averaged above 300 milligrams per kilogram (mg/kg) of soil. Dust in some process equipment contained as much as 59 percent cadmium and 26 percent nickel. EPA established

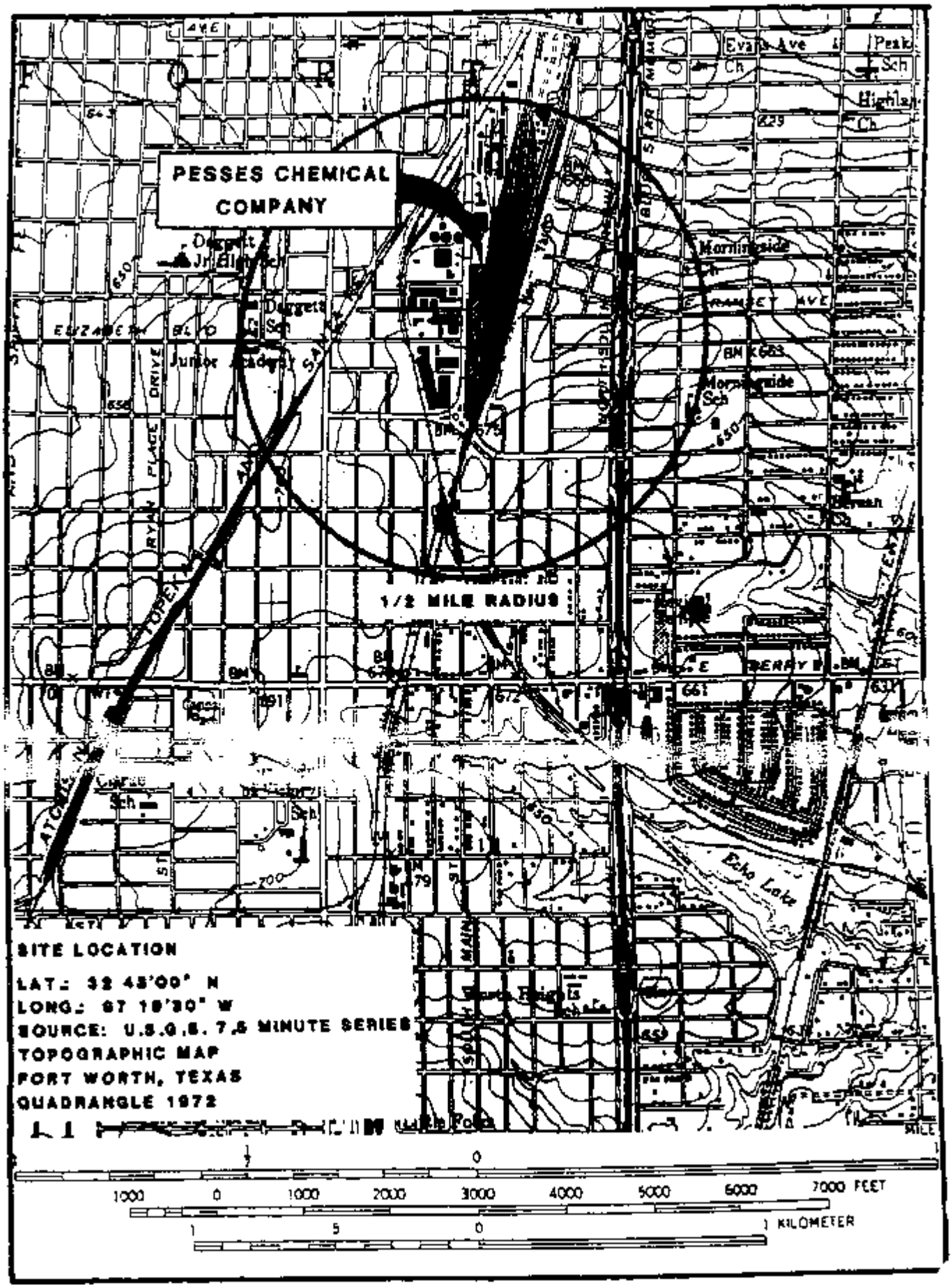


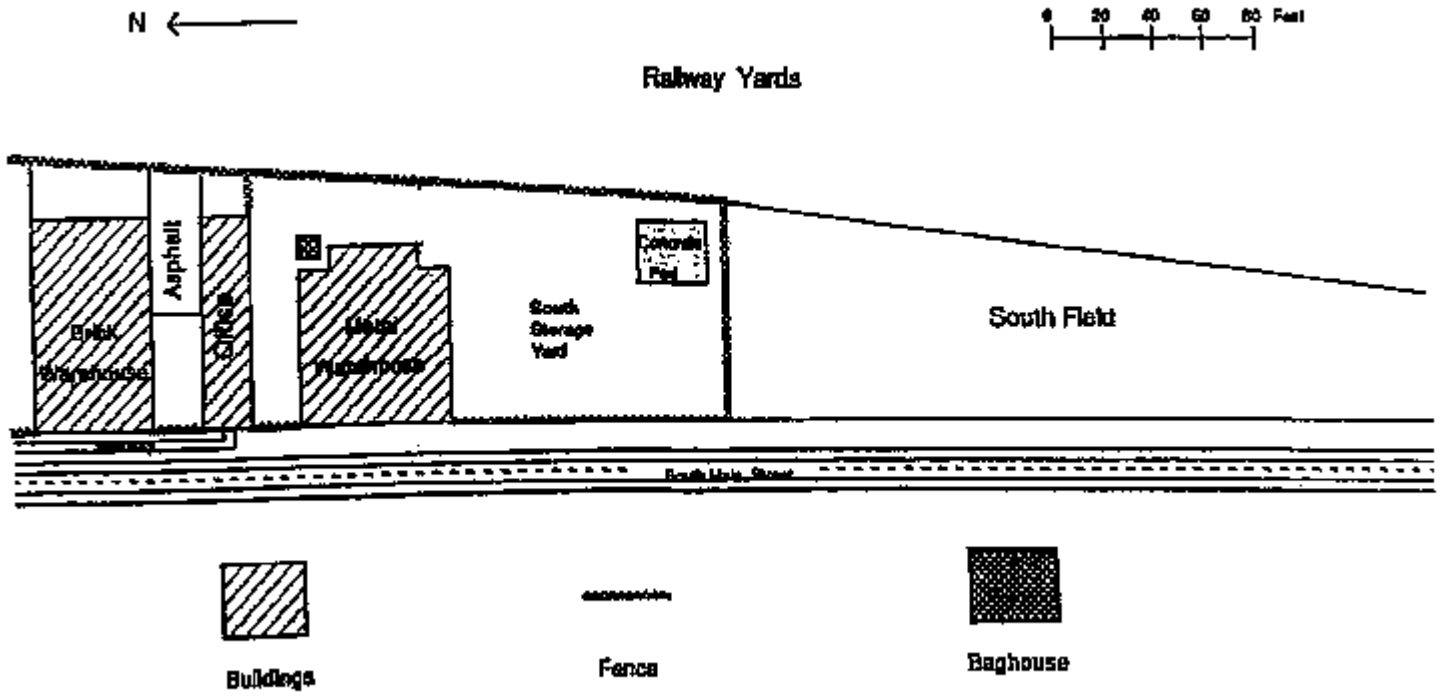
FIGURE 1 LOCATION MAP OF PESSES CHEMICAL COMPANY

Figure 2

PESSES CHEMICAL COMPANY

SUPERFUND SITE

FORT WORTH, TEXAS



Remedial Action Objectives (RAO's) for the Site to be 15 mg/kg for cadmium and 100 mg/kg for nickel. No organic contaminants were found at concentrations which posed health or environmental impacts. No asbestos was detected. Because the ground water is 380 feet below low permeability clay, shale and shaley limestone, and the maximum depth of Site contaminants was less than 13 feet, the EPA has determined that the ground water was not and will not, in the future, be affected by the Site.

The EPA Regional Administrator signed the CERCLA Record of Decision (ROD) for remedial action for the Site on December 22, 1988, selecting in-situ stabilization of the contaminated soils and Site contaminants, and capping as the remedy. The EPA selected this remedy because it removed the principal threat posed by the Site conditions by eliminating the possibility of human exposure with the metal contaminants of concern and by preventing the spread of contaminants.

During the development of the Site remedial design, a determination was made on June 8, 1990, to change the cap design for the contaminated areas. The October 1988 ROD called for a clay cap over the stabilized contaminants remaining in the south field area and a separate reinforced concrete cap over the contaminants in the former operating area of the facility. However, the south field area was found to be too narrow to allow for the placement of a clay cap with a maximum of 2% slope to prevent erosion. A determination was made to use a HDPE liner covered by a reinforced concrete cap that allowed for a steeper slope. This design change had no adverse impact on either the scope or performance of the selected remedial alternative, only a negligible increase in overall Site remedial cost, and was consistent with RCRA Subtitle C Site ARARs. Thus, the design change was deemed to be "insignificant" from a regulatory procedural standpoint and no modification was deemed necessary for the ROD.

The former Site operations area consisted of a metal warehouse with various pieces of equipment, several smelters, a baghouse, two underground sumps, and a south storage yard with a concrete pad and two sumps. The remedial action contractor (Contractor) removed the refractory inside the smelters and also the two sumps in the ground. The Contractor eventually consolidated these materials, the dust and dust bags from the baghouse with the contaminated soil in the south field. The Contractor decontaminated the metal warehouse building, drums and metal process equipment by high pressure water washing. The TNRCC's oversight Engineer (Engineer) collected and analyzed wipe samples for cadmium and nickel.

The Contractor excavated 1,806 cubic yards of nearby offsite soil contaminated above the offsite RAO's and 10,553 cubic yards of onsite soil contaminated above the onsite RAO's. Contaminated soil excavated from the offsite areas was replaced with clean soil and the areas were sodded. Contaminated soil excavated from the northem portion of the Site was replaced with clean soil and the area covered with an eight-inch thick, double reinforced steel concrete slab. All of the materials left at the Site containing contaminants above the RAO's were stabilized and placed in the south field. Equilibrium Partitioning Toxicity Tests verified that the Site contaminants did not leach out of the stabilized soil.

After successful stabilization of the waste, the HDPE manufacturer's licensed contractor installed an 80-mil thick textured HDPE liner over the stabilized waste and soil. All liner seams were sealed and tested in accordance with the manufacturer's specifications. Then the eight-inch thick, double reinforced steel concrete cap was placed over the HDPE liner. A six foot high chain link fence and one gate with a padlock was installed around the stabilized and capped area. Warning signs were placed around the stabilized and capped waste area. Additionally, the rest of the Site was fenced with a six foot high chain link fence and two gates with padlocks.

Other than the material required for laboratory analysis, all contaminated material remained on the Site and is contained within the capped and fenced area. To reduce the quantity of buried material and to recycle steel, the scrap steel was decontaminated with high pressure hot water, removed from the Site by Texas Industrial Scrap Iron & Metal Company and by Hutchinson Commercial Metal Company, and sent to their steel recycle facilities. The potentially contaminated wash water and decontamination water were used in the contaminated soil compaction and stabilization activities. Daily industrial hygiene air monitoring samples were collected and analyzed for Site contaminants and particulates by EPTECH Environmental Technologies during the remedial activities. No contaminant levels specified in the ROD or ARARs were exceeded. Documentation of the complete results and the sampling and analytical program accuracy is included in the November 1992 Final Remedial Action Report.

On September 15, 1992, Mr. Louis Rogers, TNRCC Project Manager; Mr. Mike Cavalier and Mr. Roger Brown, Construction managers for Roy F. Weston, Inc., the TNRCC's Engineer; Mr. John Arias, President, and Ms. Maria Hardy, Record Keeper, for Arens Corporation, Inc., the TNRCC's Contractor; and Earl Hendrick, EPA Remedial Project Manager conducted the Construction Final Inspection. The team determined that the remedial action had been completed successfully. In November 1992, Roy F. Weston, Inc. submitted to the TNRCC the Engineer's Final Remedial Action Report, detailing the remedial activities and documenting the successful completion of all construction activities. On September 30, 1993, the Acting Regional Administrator signed the EPA Final Close Out Report. This Site was deleted from the NPL on September 28, 1995 (60 *Fed. Reg.* 50114).

The Pesses Site was the subject of a civil cost recovery action by the EPA and the U. S. Department of Justice under Section 107 of Superfund, 42 U. S. C. § 9607, in the United States District Court styled United States *vs*. Motorola, Inc., *et al.*, C.A. No. 4:96-CV-226Y, N.D. Tex. The case was settled by a consent decree entered by the Court on July 12, 1996, for a total of approximately $2.6 million, or 100% of the Site Superfund response costs.

REMEDIAL OBJECTIVES

As noted previously, on December 22, 1988, Mr. Robert E. Layton, the Region 6 Regional Administrator signed the ROD, declaring that the ROD was consistent with CERCLA as amended by the National Contingency Plan, that the remedy provides adequate protection of

human health and the environment, and that the remedy achieved the Federal and State requirements that are applicable, or relevant and appropriate to the Site. This remedy also satisfied the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element and utilizes permanent solutions and alternative treatment technologies to the maximum extent possible. The remedy is cost effective. Because hazardous substances will remain onsite, 5-year reviews are required to ensure that the remedy continues to provide adequate protection of human health and the environment.

Remedy

The remedial action is described on the previous pages in detail. In summary, the ROD specified in-situ stabilization of the contaminated soils and Site contaminants, and capping as the remedy. The EPA selected this remedy because it eliminates the principal threat posed by Site conditions by eliminating the possibility of human exposure to the metal contaminants of concern and by preventing the spread of these contaminants

Criteria to Determine Compliance

Success of the remedy is dependant upon the contaminants not leaching out of the stabilized soil and upon the concrete cap and HDPE liner not failing. Therefore, the State semiannual or annual inspections include determining that none of the stabilized contaminated soil has become exposed or accessible for contact by humans or animals. During this 5 year review, it was noticed that three fence post supporting the fence surrounding the nonhazardous area had been bent recently probably by a motor vehicle. The chain link fence material is intact although trespassers can get over the fence to the clean area of the Site. The State may have the fence post repaired. The timing of the repair or even the need for the repair is not critical since the fence with the damaged posts does not enclose any of the area where the stabilized and capped contamination is located, *i.e.*, the fence around the stabilized and capped contamination is intact.

ARARS REVIEW

EPA Region 6 reviewed the applicable, relevant and appropriate requirements (ARARS's) to determine if the remedy remains protective and concluded that there are no new standards which would render the remedy inadequate. Site ARARS are set forth and described on pages 14 through 17 of the ROD. EPA Region 6 also reviewed the Texas Department of Health (TDH) Site Review and Update issued September 1, 1993, and revised February 16, 1994, that stated that no further follow-up is recommended. During the 5-year review, the EPA and the State observed that the integrity of the concrete cover has not deteriorated from the time that it was installed. The remedy relies on the integrity of the concrete cap and HDPE liner under the concrete cap. All inspections to date indicate that the concrete cap continues to protect the environment.

SUMMARY OF SITE VISITS

On January 27, 1999, Earl Hendrick, the EPA Remedial Project Manager inspected the Site with Mr. J. Thompson of the TNRCC and concurred with the State's findings. All State Site inspections are summarized in the State's Operation and Maintenance reports to Region 6 U.S. EPA and in the J. D. Thompson inspection reports in Appendix A. The concrete cover and seams are always reported to be in good condition or in need of very minor repairs.

AREAS OF NONCOMPLIANCE

The remedy is in compliance with the ROD. The ROD specified in-situ stabilization of the contaminated soils and Site contaminants, and capping as the remedy. The EPA selected this remedy because it eliminates the principal threat posed by Site conditions by eliminating the possibility of human exposure to the metals of concern and preventing the spread of contaminants. Neither the concrete cap over the stabilized waste nor the fence around the capped area has deteriorated. Thus, human and animal contact with Site contaminants is precluded.

RECOMMENDATIONS

The State, with the concurrence of Region 6 U.S. EPA is making semiannual Site inspections. Because the area is known to suffer from vandalism, the State should maintain this inspection frequency. The concern is that the fence surrounding the capped area should be repaired, if damaged, and that the cap should be inspected for failure and repaired if needed.

STATEMENT OF PROTECTIVENESS

Region 6 U.S. EPA certifies that the Pesses Site remedy continues to protect human health and environment from the hazards identified in the ROD.

NEXT REVIEW

Region 6 U.S. EPA will conduct the second five-year review in 2002 - ten years after the start of remediation activities at the Site. The TNRCC's next Site inspection is planned for early 2001.

APPENDIX A - STATE REPORTS

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Emmanuel C. Ndame, Project Manager
Superfund Investigation Section
Remediation Division

Date: March 10, 2000

Thru: Wesley G. Newberry, Team Leader
Superfund Site Discovery and Assessment Team
Site Assessment and Management Section

From: James D. Thompson, Field Investigator - Region 4

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
Biannual Operations & Maintenance (O&M) Inspection

OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On January 26, 2000, the writer conducted an O&M Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to determine site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

RESULTS OF INSPECTION

During the inspection, the 20' portion of the perimeter chain link fence and three posts located along South Main Street (adjacent to the non-hazardous area of the site) first reported damaged from a vehicle impact during the January 27, 1999 inspection were noted still needing repairs. The extent of damage remains the same. It appears vagrants are still entering the site under the collapsed portion of the fenceline and seeking overnite refuge in the on-site building.

During interviews with the staff of the adjacent facility (Singer Metals), the writer was informed that their staff would be able to maintain the grassy areas along the site boundaries. It is recommended that weed control measures be implemented this spring as windblown seeds have established weed pockets within the concrete seam areas throughout the site.

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Emmanuel C. Ndame, Project Manager
Federal Facilities Program

Date: 8-31-99

Thru: Wade Stone, Team Leader
Federal Facilities Program
Superfund Cleanup Section

Wesley G. Newberry, Team Leader
Superfund Site Discovery and Assessment Program
Site Evaluation/Remediation/Restoration Section

From: James D. Thompson, Project Manager
For Superfund Site Discovery and Assessment Program

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
Biannual O & M Inspection

OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

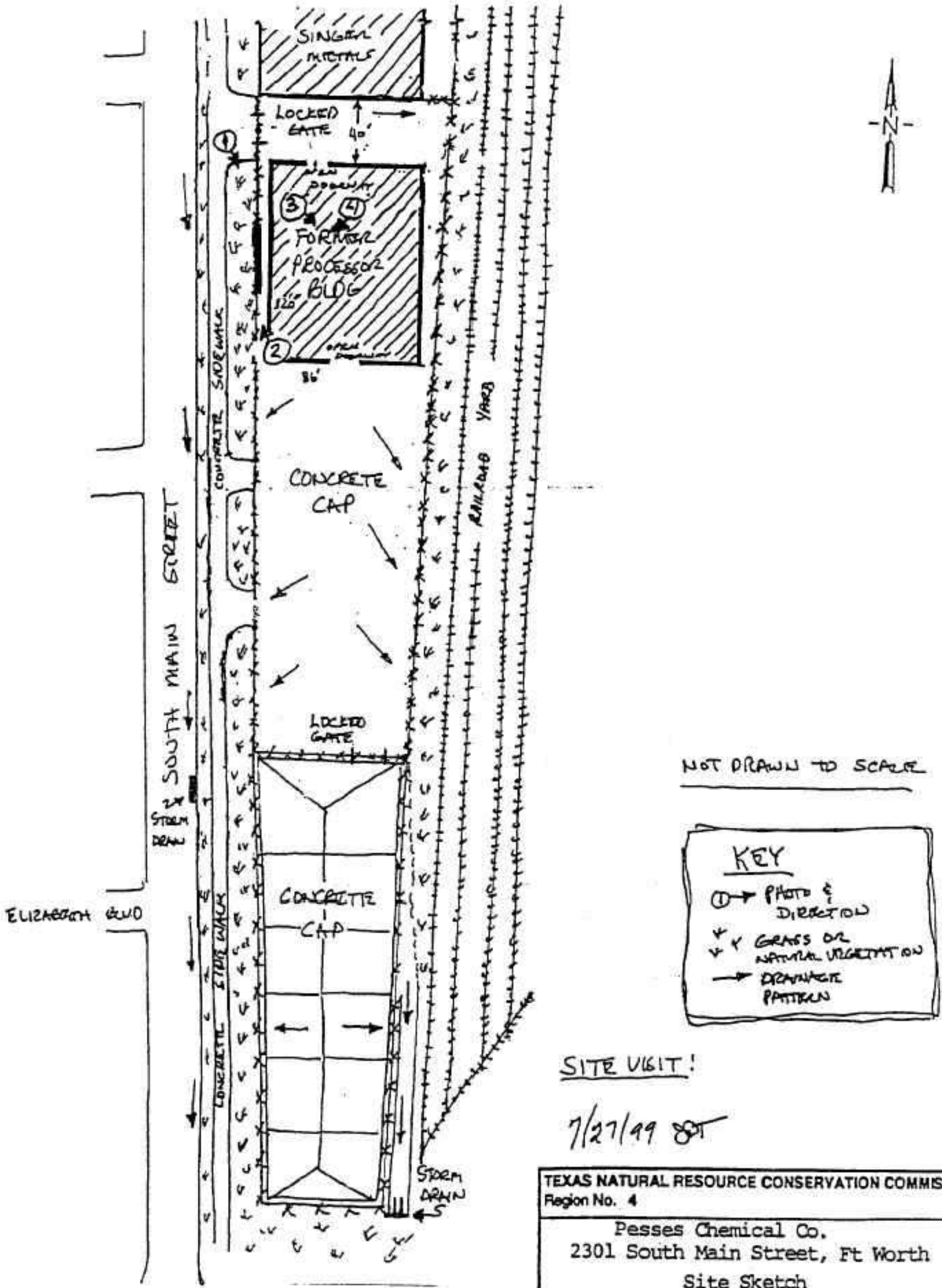
On August 13, 1999, the writer conducted an Operations and Maintenance (O&M) Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to determine site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

RESULTS OF INSPECTION

During the inspection, the concrete covered area in the northern portion of the site and the sloped concrete cap in the southern portion were noted in good condition with no seepage or erosion noted from the top or side seams.

During the inspection, it was noted that the spalled areas along the top center seam of the southern sloped concrete cap previously identified for minor maintenance had been repaired. The two areas are marked on the attached sketch and photographs. The site was left locked and secured.

Attachments



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Ft Worth
Site Sketch

TXD None Tarrant County

Photo #1 - The damaged portion of the perimeter fenceline included approximately 20' located along the west side of the site as shown above. Photo taken facing south.

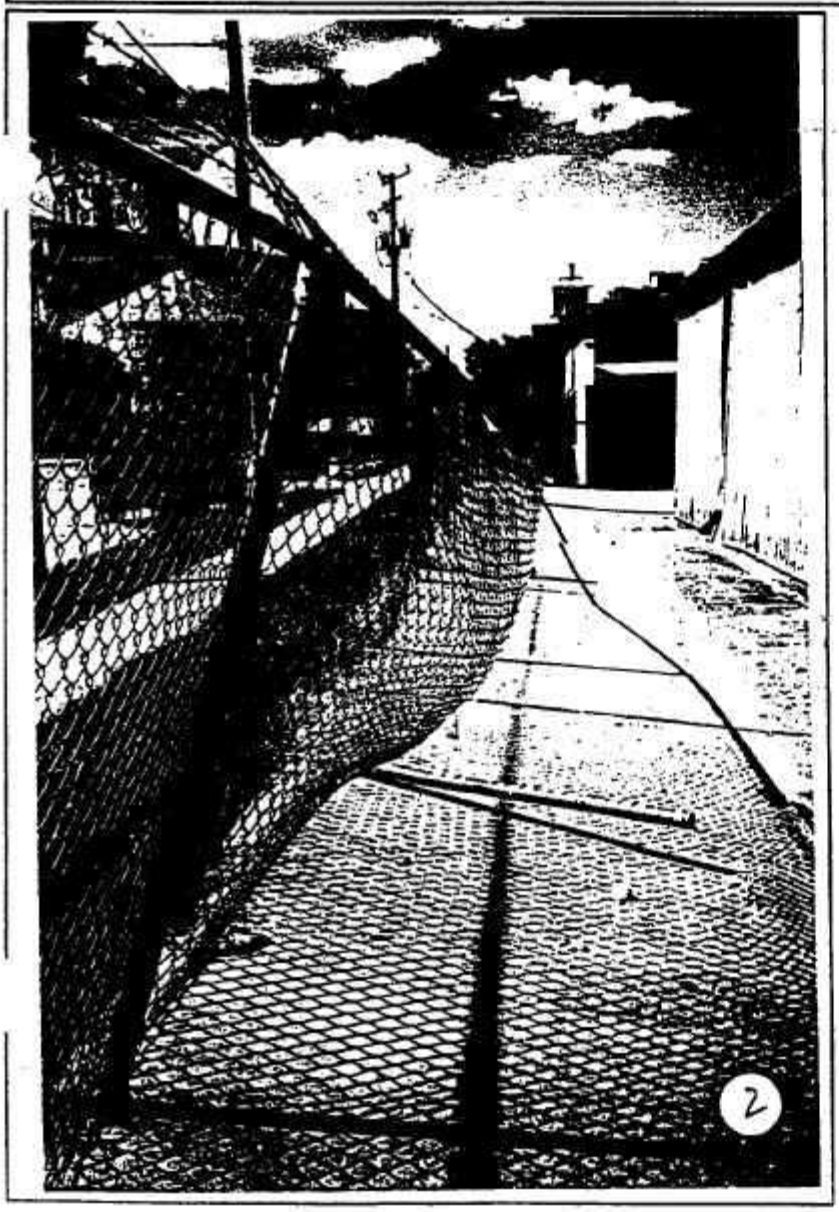


Photo #2 - Damage included three fence posts and stretched wire as shown at the left. It appeared vagrants had been getting under the stretched wire along the bottom portion and entering the site.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

PESSES CHEMICAL COMPANY
2301 South Main Street, Fort Worth, Tarrant County, Texas
TXD None. SWR # None
Site Visit: 07/27/99
Site Photographer: J. D. Thompson, Field Investigator

Photo #3 - Photo of the interior of the on-site process building where vagrants apparently took shelter during evening hours. Photo taken inside the structure facing southeast.

Photo #4 - Metal portions of the building were being stripped and apparently sold as salvage and used to sleep on inside the building. Photo taken inside the structure facing southwest towards the street.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

PESSES CHEMICAL COMPANY
2301 South Main Street, Fort Worth, Tarrant County, Texas
TXD None, SWR # None
Site Visit: 07/27/99
Site Photographer: J. D. Thompson, Field Investigator

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Emmanuel C. Ndame, Project Manager
Superfund Cleanup Section
Remediation Division

Date: 4-2-99

Thru: Wesley G. Newberry, Team Leader
Superfund Site Discovery and Assessment Team
Site Evaluation, Remediation and Restoration Section

From: James D. Thompson, Field Investigator - Region 4

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
Biannual Operations & Maintenance (O&M) Inspection

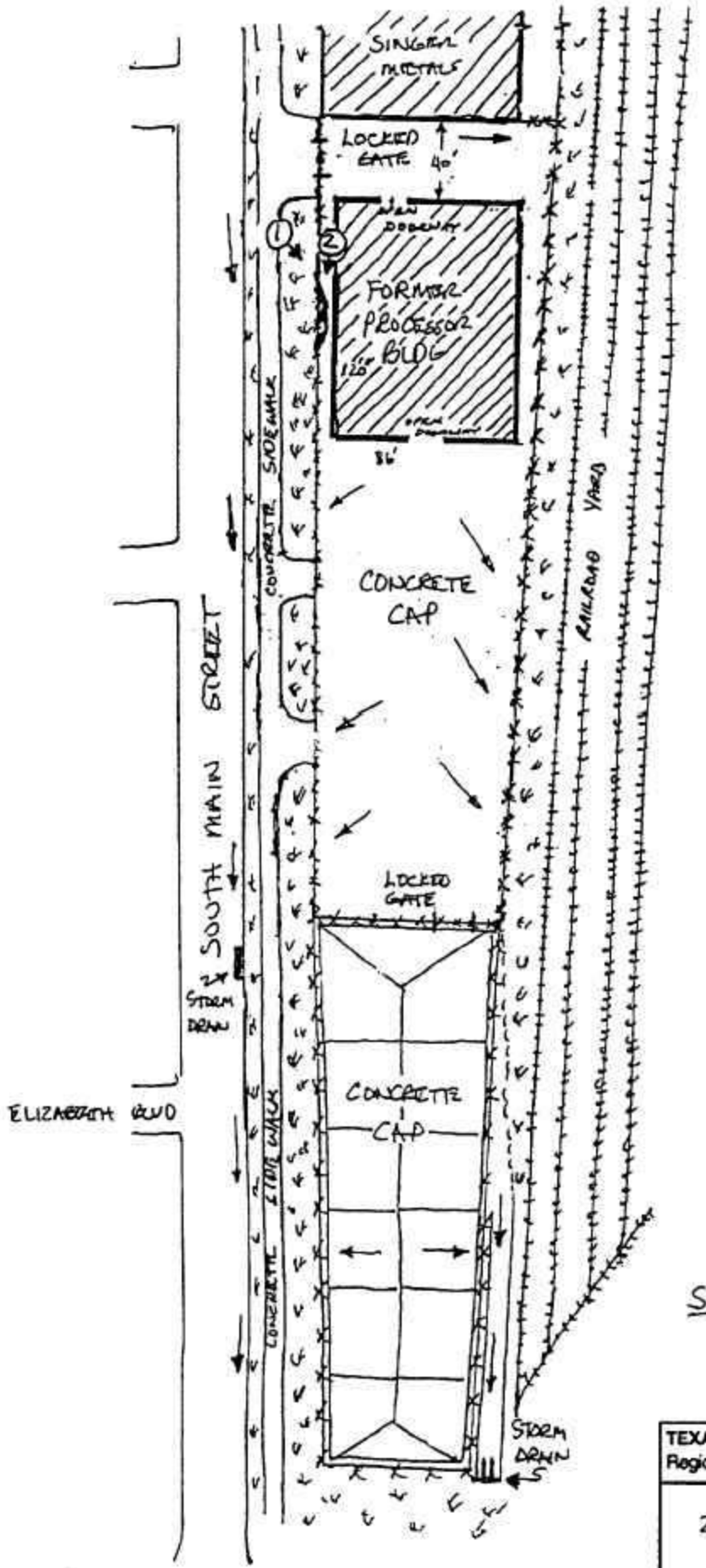
OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On January 27, 1999, the writer, accompanied by Earl Hendrick, EPA Region 6 Superfund Program, conducted an O&M inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to determine site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

RESULTS OF INSPECTION

During the inspection, a 20' portion of the perimeter chain link fence and two posts located along the west portion of the site along South Main Street had been damaged from a vehicle impact. The extent of damage and location is shown on the attached site sketch and photographs. The damage had occurred several weeks ago, apparently from a hit and run accident. The adjacent facility manager was instructed to notify the TNRCC immediately when such incidents occur so that appropriate action could be taken in a timely manner. The site was left locked and secured.

Attachments



N

NOT DRAWN TO SCALE

KEY

① → PHOTO & DIRECTION

GRASS OR NATURAL VEGETATION

→ DRAINAGE PATTERN

SITE VISIT!

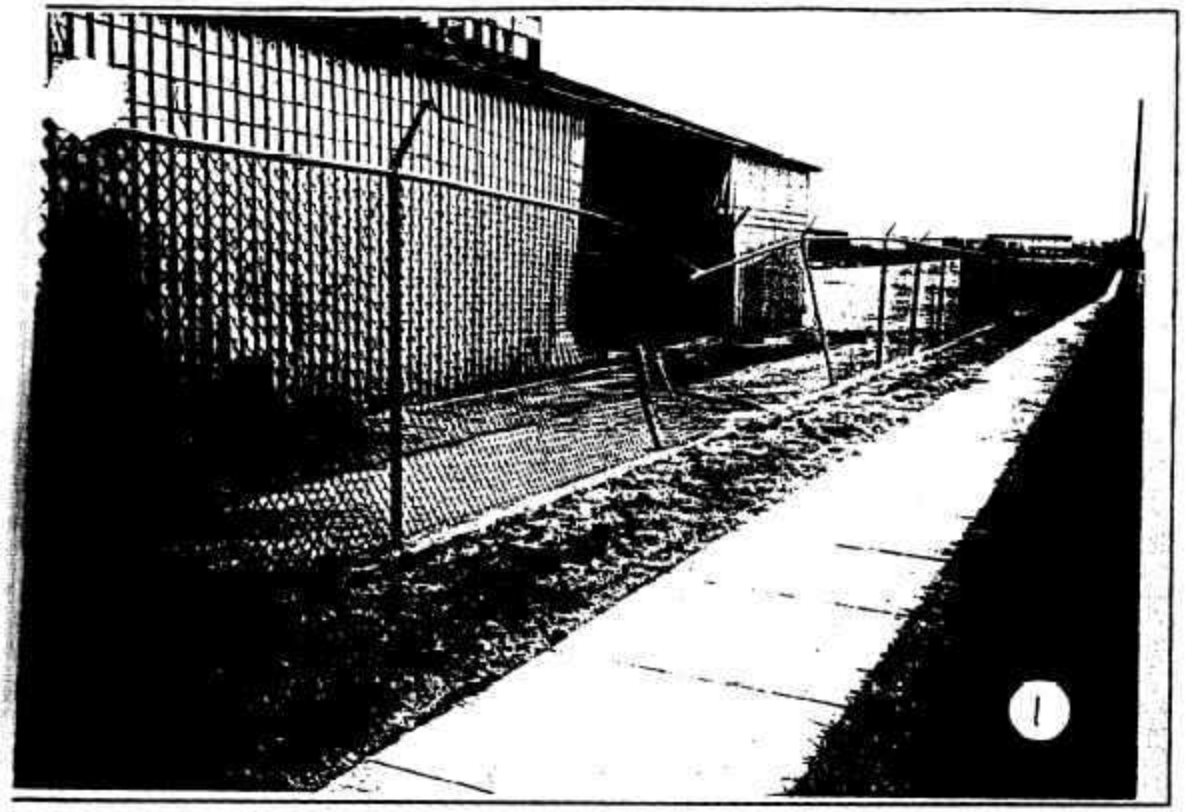
1/27/99 BT

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

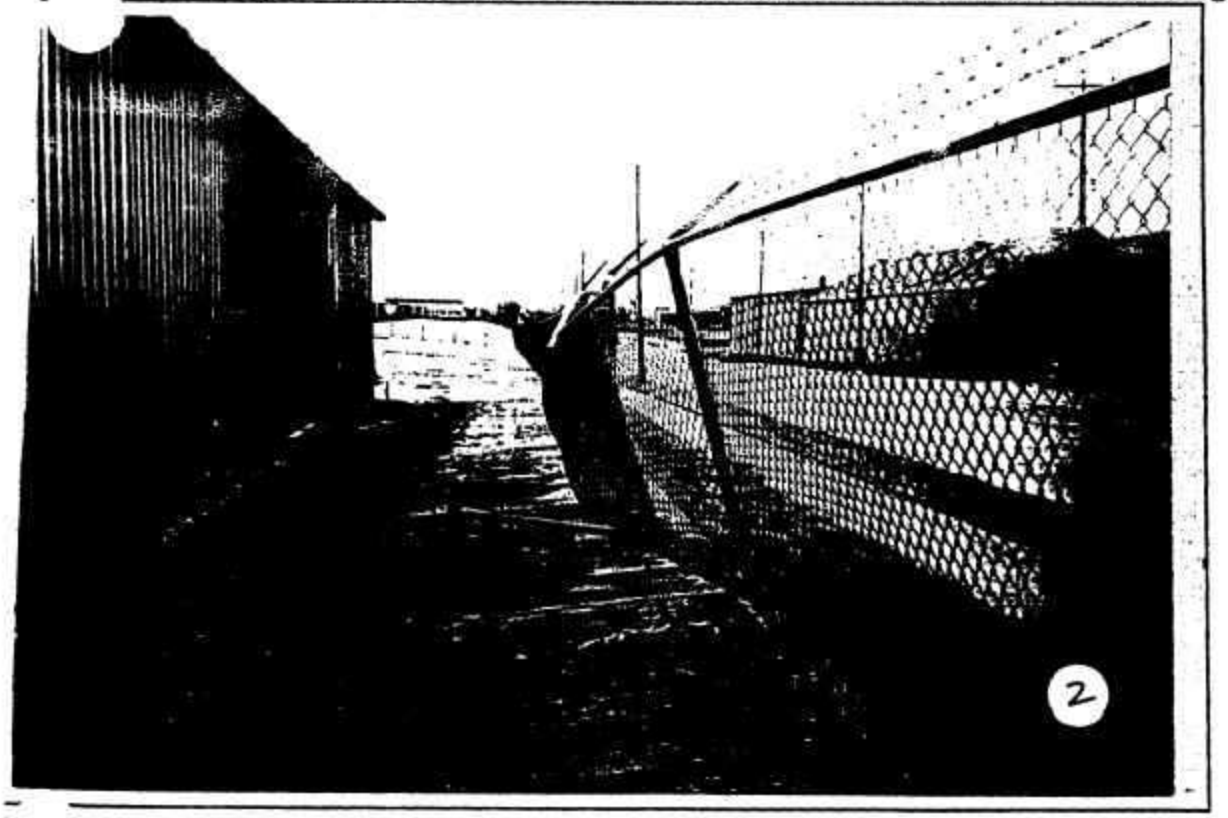
Pesses Chemical Co.
2301 South Main Street, Ft Worth
Site Sketch

TXD None

Tarrant County



ıto #1 - (13:15 pm) - A 20' portion of the chainlink fence surrounding the site had been damaged from a vehicle impact as shown above. Photo taken from South Main Street facing SE.



#2 - (13:20 am) - Two of the fence posts were noted damaged and the chain link fence had been stretched but not penetrated as shown above. Photo taken just inside the west entrance gate facing south.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

PESSES CHEMICAL COMPANY
2301 South Main Street, Fort Worth, Tarrant County, Texas
TXD None. SWR # None
Site Visit: 01/27/99
Site Photographer: J. D. Thompson, Field Investigator

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Pesses Chemical Company Superfund File

Date: April 29, 1998

Thru: Robert Hinojosa, P.E., Unit Manager
Superfund Cleanup Section
Remediation Division

From: Emmanuel C. Ndame, Project Manager
Superfund Cleanup Section
Remediation Division

Subject: Pesses Chemical Company Superfund Site - Site Inspection.

On April 16, 1998, J.D. Thompson, Field Investigator with the TNRCC Region 4, and myself conducted a site inspection of the Pesses Chemical Company Superfund Site, located at 2301 South Main Street, Fort Worth, Texas.

The site appeared secured. No signs of trespassing and/or vandalism was evident. The concrete cap was generally in good condition, however, the following concerns were discerned from this investigation: the condition of the seams in some sections of the concrete cap has deteriorated and need to be replaced and/or repaired; tension cracks were also observed in some additional sections of the cap. These cracks remain a potential source of infiltration into the cell, thus compromising the long term effectiveness of this remediation alternative to protect human health and the environment; the flanks of the concrete cap showed pervasive growth of deep rooted plants. Evidently, this could ultimately also compromise the long term integrity of the cap and potentially expose humans and the environment to unacceptable risk.

J.D. Thompson expressed some concerns with the inspection schedule. Mr. Thompson contends that based on the original Operation and Maintenance Plan, no additional inspection is required at the site any longer. A review of the Record of Decision and other related site documentation is needed, however, it is conceivable that a continued periodic inspection of the facility is required.

Recommendation:

Although the repairs indicated above are minor in extent over the shortterm, the consequences of neglecting these repairs in the long term could be enormous. The man-hours and funding needed to remedy the existing situation would be incorporated in the FY '99 budget. Pesses Chemical Site would not be impacted negatively if the repairs indicated above is delayed to FY '99.

Emmanuel C. Ndame

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Emmanuel C. Ndame, Project Manager
Superfund Investigation Section
Pollution Cleanup Division

Date: 3-9-98

Thru: Wesley G. Newberry, Unit Manager
Superfund Site Discovery and Assessment Team
Site Assessment Section

From: James D. Thompson, Project Manager - Region 4
Superfund Site Discovery and Assessment Team

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
Biannual O & M Inspection

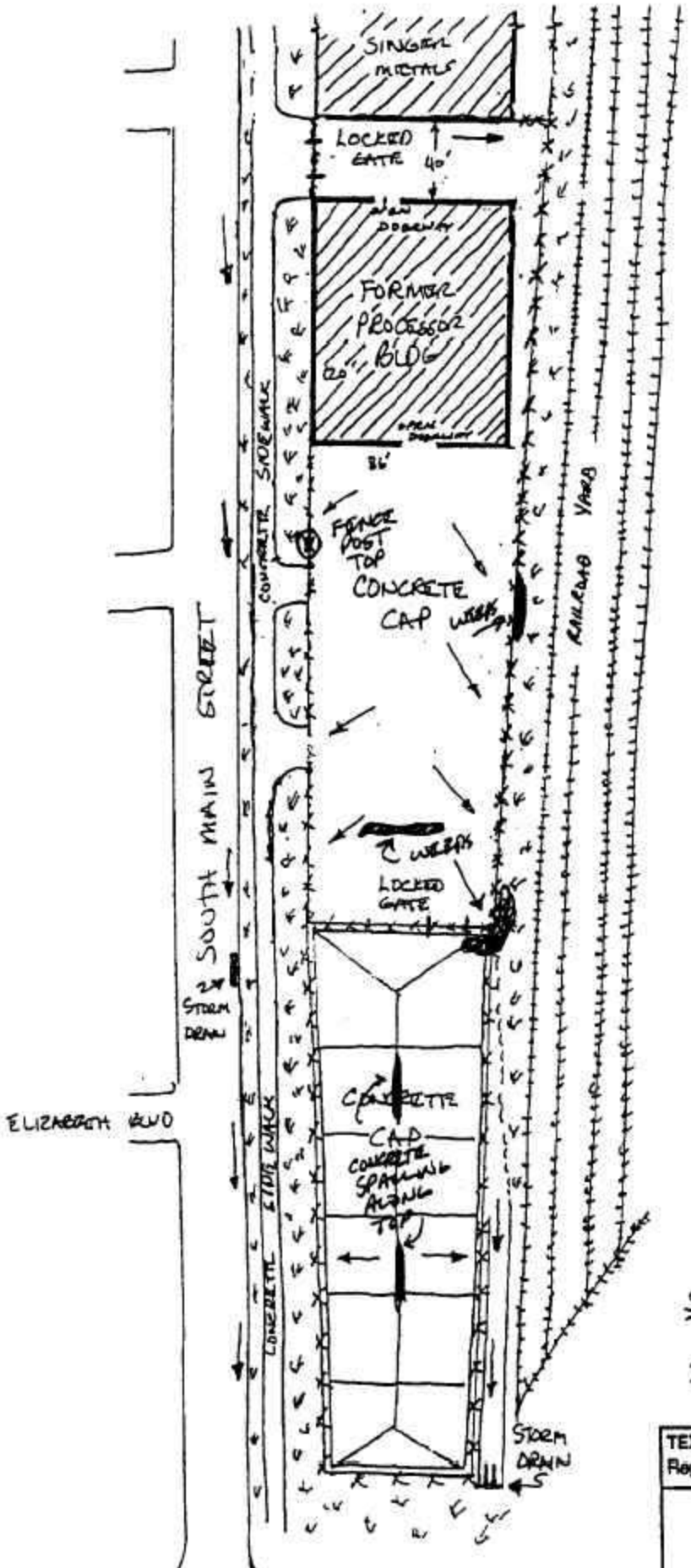
OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On February 12, 1998, the writer conducted an Operations and Maintenance (O&M) Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to conduct a biannual verification of site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

RESULTS OF INSPECTION

During the inspection, the concrete covered area in the northern portion of the site and the sloped concrete cap in the southern portion of the site were noted in good condition with no seepage or erosion noted from the top or side seams. However, it was noted that several areas along the edges of the top center seam of the sloped concrete cap were spalling and minor maintenance is recommended. The two areas are marked on the attached site sketch.

In addition, one of the fence line top posts had come loose and the barbed wire was sagging in this area. It was noted that weeds were established in several of the cap seams along the east perimeter and north central area and a small tree (0.5" diameter) was growing in one of the seams. Recommend minor maintenance to correct the above noted deficiencies (locations marked on attached site sketch). The site was left locked and secured.



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NOT DRAWN TO SCALE

KEY

- PHOTO & DIRECTION
- GRASS OR NATURAL VEGETATION
- DRAINAGE PATTERN
- MAINTENANCE AREAS
- FENCE REPAIRS

SITE VISIT:

2/12/98 ST

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Ft Worth
Site Sketch

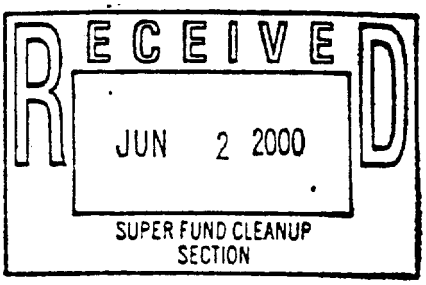
TXD None Tarrant County

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Robert D. Conti, Project Manager
Superfund Investigation Section
Pollution Cleanup Division

Date: July 16, 1997



Thru: Wesley G. Newberry, Unit Manager
Superfund Site Discovery and Assessment Team
Emergency Response and Assessment Section

From: James D. Thompson, Field Investigator - Region 4

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
Biannual O & M Inspection

OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On July 9, 1997, the writer conducted an Operations and Maintenance (O&M) Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to conduct a biannual verification of site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

RESULTS OF INSPECTION

During the inspection, the concrete covered area in the northern portion of the site and the sloped concrete cap in the southern portion of the site were noted in good condition with no seepage or erosion noted from the top or side seams. Wind-blown debris along the fenceline and broken glass were picked up and disposed. The signs previously posted were noted intact and in good condition. The site was left locked and secured.

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: File - Pesses Chemical Company Superfund Site, Fort Worth **Date:** June 15, 1997

Thru: RH Robert Hinojosa, Unit Manager, Superfund Cleanup Section, Remediation Division

From: Emmanuel C. Ndame, Project Manager, Superfund Cleanup Section, Remediation Division

Subject: Site visit of May 27, 1998

On 5/27/98, the author, Emmanuel C. Ndame of the Texas Natural Resource Conservation (TNRCC) visited the Pesses Chemical site to conduct a site inspection and treat the deep rooted plants growing on the edge of the concrete cap with a herbicide, expected to selectively eliminate the deep rooted plants.

The site appeared secured and showed no evidence of vandalism. Deep rooted plants were pervasive along the edges of the concrete cap. It is believed that if the deep rooted plants which has historically grown on the edges of the capped cell, is unaddressed, it could jeopardize the integrity of the concrete cap in the future.

During this site visit, the deep rooted plants were treated with a herbicide, formulated onsite, in accordance with the manufacturer's instructions. This involved mixing one teaspoon of Grazon ET with one teaspoon of Activator 90. This mixture was made up to one gallon by adding water; transferred to a mechanically pressurized Home and Garden Sprayer and subsequently applied in-place on the deep rooted plants growing along the edges of the concrete cap.

This mixture selectively eliminates woody tissue plants. It has been used successfully at the Crystal City Airport site where it has selectively eliminated the Rotoma plant, a deep rooted woody tissue plants similar to the deep rooted plants found at the Pesses Chemical Company site. This mixture is believed to be easily biodegradable with no adverse impact on human health and the environment. The ability of this application to selectively eliminate the deep rooted plants growing along the edge of the capped cell would be evaluated at the next field inspection. The TNRCC would re-evaluate other alternatives if the deep rooted plants are found to be resistant to this mixture.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 4, 1997

Mr. Earl Hendrick
Texas Construction Section
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Pesses Chemical Company Federal Superfund Operations & Maintenance (O&M) Inspection Schedule

Dear Mr. Hendrick:

On January 29, 1997 J.D. Thompson, representing the Texas Natural Resource Conservation Commission (TNRCC), visited the Pesses Chemical Company site for the 5th year, 1st quarter state-funded O&M inspection.

Mr. Thompson stated that the site was noted to be in good condition.

The next inspection - for the 5th year, 3rd quarter - is tentatively scheduled for July, 1997. After completion of that inspection, we will notify you of site conditions.

Sincerely,

Robert D. Conti, Project Manager
Superfund Investigation Section
Pollution Cleanup Division

RDC:ls

cc: J.D. Thompson, TNRCC (6421 Camp Bowie Blvd., Suite 312 / Fort Worth, TX 76116)

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Robert D. Conti, Project Manager
Superfund Investigation Section
Pollution Cleanup Division

Date: 11-26-96

Thru: Wesley G. Newberry, Unit Manager
Superfund Site Discovery and Assessment Team
Emergency Response and Assessment Section

From: James D. Thompson, Field Investigator - Region 4
Superfund Site Discovery and Assessment Team
Emergency Response and Assessment Section

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
O & M Inspection; Conducted on 8/22/96

OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On August 22, 1996, the writer conducted an Operations and Maintenance (O&M) Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to conduct a biannual verification of site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

GENERAL FACILITY AND WASTE PROCESS INFORMATION

The referenced facility is an abandoned metals recycling facility that recovered cadmium and nickel from nickel-cadmium batteries from December 1978 to January 1981. Improper storage, dumping and air emissions of cadmium all contributed to site contamination. An EPA Record of Decision selected in-situ stabilization of contaminated soils (both on- and off-site) and remaining on-site materials. Excavated soils were placed under a high density polyethylene top liner and covered by an eight-inch thick steel-reinforced concrete cap. An intruder-resistant fence was placed around the site. Remediation was completed in September 1992. From September 1993 to September 1994, the TNRCC Superfund Engineering Section (SES) completed the first year of State O&M inspections, and transferred inspection requirements to the Superfund Investigations Section (SES). On January 18, 1996, the Superfund Site Discovery and Assessment Team (SSDAT) Regional Field

Investigator assigned to Region 4 was requested to conduct the required biannual inspections until October 1997.

SURROUNDING LAND USE

The referenced facility is located in the south central portion of the City of Fort Worth in a mixed industrial/urban area. The nearest residence is located approximately 600 feet west of the site along Hemphill Road. The nearest business is located adjacent to the site along the north perimeter. Drainage from the site flows south and away from the center concrete cap towards storm drain entrances located along South Main Street and in the southeast corner of the site.

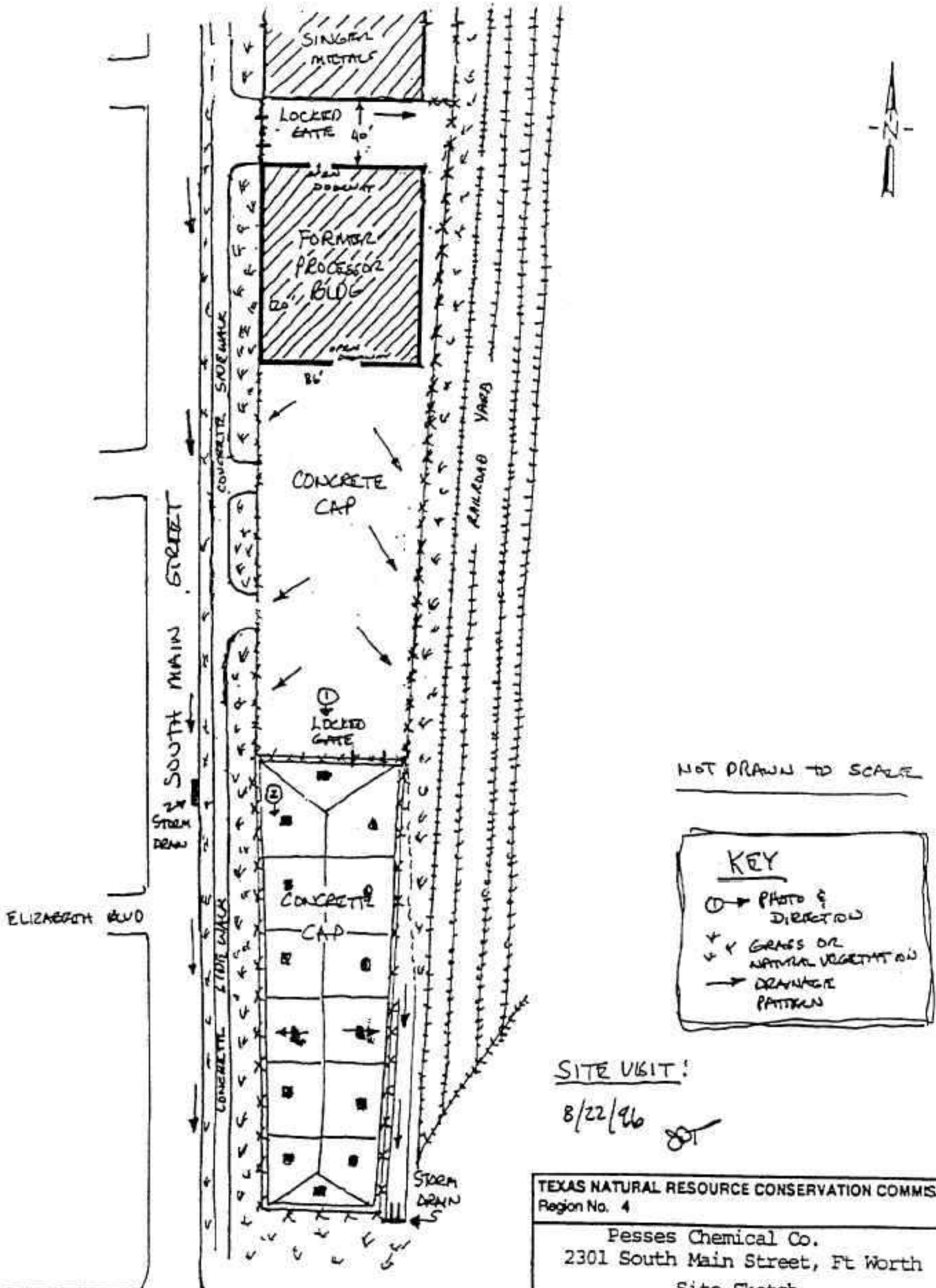
RESULTS OF INSPECTION

During the previous February 26, 1996 Region 4 O&M inspection, the writer had recommended that the site be properly posted to enhance site security and copies of the gate keys be obtained. During the August 22, 1996 Region 4 O&M inspection, the writer contacted Mr. Larry P. Marquardt, owner of the adjacent business, and obtained copies of keys to the outside gates for access during non-business hours. The writer posted warning signs as indicated in the attached Site Sketch and photographs. During the inspection, the concrete covered area in the northern portion of the site was noted in good condition with no cracks or spalding noted. The sloped concrete cap in the southern portion of the site was also noted in good condition with no seepage or erosion noted from the top or side seams.

RECOMMENDATION

None.

Attachments



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION Region No. 4
Pesses Chemical Co. 2301 South Main Street, Ft Worth Site Sketch
TXD None — Tarrant County

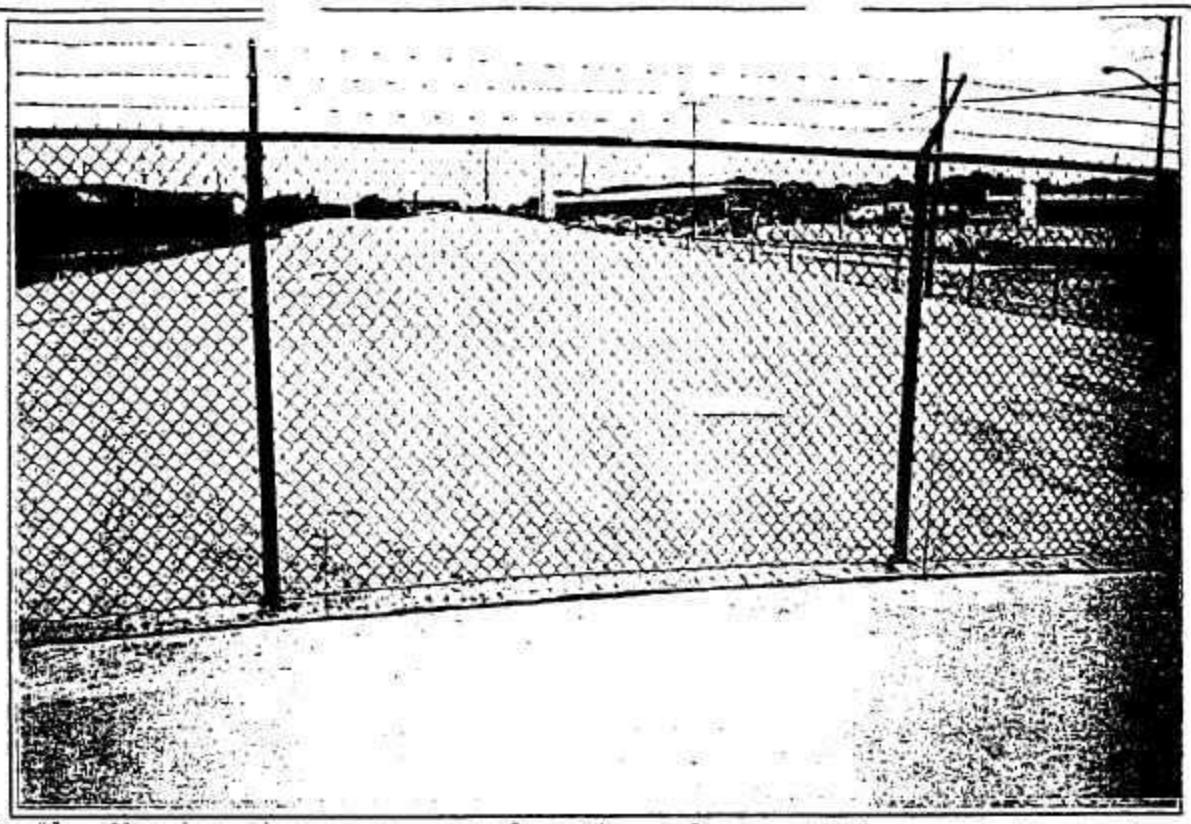


Photo #1 - Warning signs were posted on the end caps of the concrete section located on the south portion of the site as shown above. Photo taken facing south.

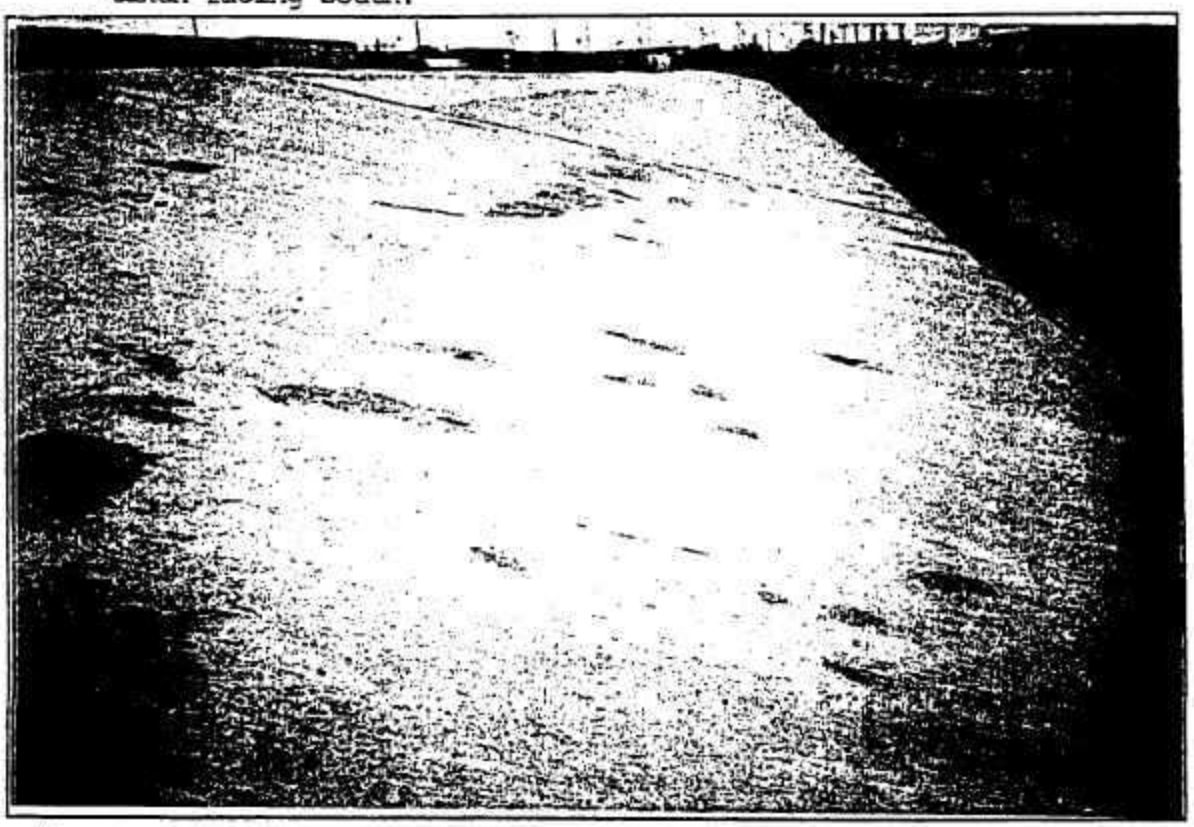


Photo #2 - Warning signs were also placed every 200' along the east and west portions of the concrete cover as shown above. Photo taken facing south.

TEXAS NATURAL RESOURCE CONSERVATION COMMISS
Region No. 4

Pesses Chemical Co. Site
2301 South Main Street, Fort Worth, TX
TXD None
Site Visit: 8/22/96
Site Photographer: [illegible] D. Thompson

TNRCC-0636

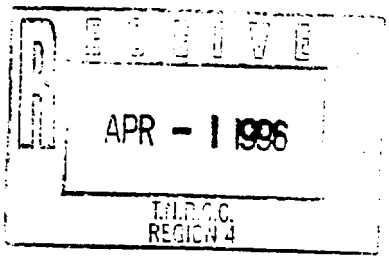
Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Robert D. Conti, Project Manager
Superfund Investigation Section
Pollution Cleanup Division

Date: March 26, 1996

Thru: Wesley G. Newberry, Unit Manager
Superfund Site Discovery and Assessment Team
Emergency Response and Assessment Section



From: James D. Thompson, Field Investigator - Region 4
Superfund Site Discovery and Assessment Team
Emergency Response and Assessment Section

Subject: Pesses Chemical Company - Fort Worth, Texas
SW Registration No. None; EPA Identification No. None
O & M Inspection; Conducted on 2/26/96

OBJECTIVES OF OPERATIONS AND MAINTENANCE INSPECTION

On February 26, 1996, the writer conducted an Operations and Maintenance (O&M) Inspection of the Pesses Chemical Company site located at 2301 South Main Street, Fort Worth, Texas. The purpose of the O&M inspection was to conduct a biannual verification of site conditions and identify deficiencies for corrective action in accordance with the approved O&M Plan.

GENERAL FACILITY AND WASTE PROCESS INFORMATION

The referenced facility is an abandoned metals recycling facility that recovered cadmium and nickel from nickel-cadmium batteries from December 1978 to January 1981. Improper storage, dumping and air emissions of cadmium all contributed to site contamination. An EPA Record of Decision selected in-situ stabilization of contaminated soils (both on- and off-site) and remaining on-site materials. Excavated soils were placed under a high density polyethylene top liner and covered by an eight-inch thick steel-reinforced concrete cap. An intruder-resistant fence was placed around the site. Remediation was completed in September 1992. From September 1993 to September 1994, the TNRCC Superfund Engineering Section (SES) completed the first year of State O&M inspections, and transferred inspection requirements to the Superfund Investigations Section (SIS). On January 18, 1996, the Superfund Site Discovery and Assessment Team (SSDAT) Regional Field Investigator assigned to Region 4 was requested to conduct the required biannual inspections until October 1997.

SURROUNDING LAND USE

The referenced facility is located in the City of Fort Worth as shown in the attached map. The land use within one mile of the facility is mixed industrial/urban. The nearest residence is located approximately 600 feet west of the site along Hemphill Road. The nearest business is located adjacent to the site along the north perimeter. Drainage from the site flows south and away from the center cap towards storm drain entrances located along South Main Street and in the southeast corner of the site (shown in attached site sketch and photographs).

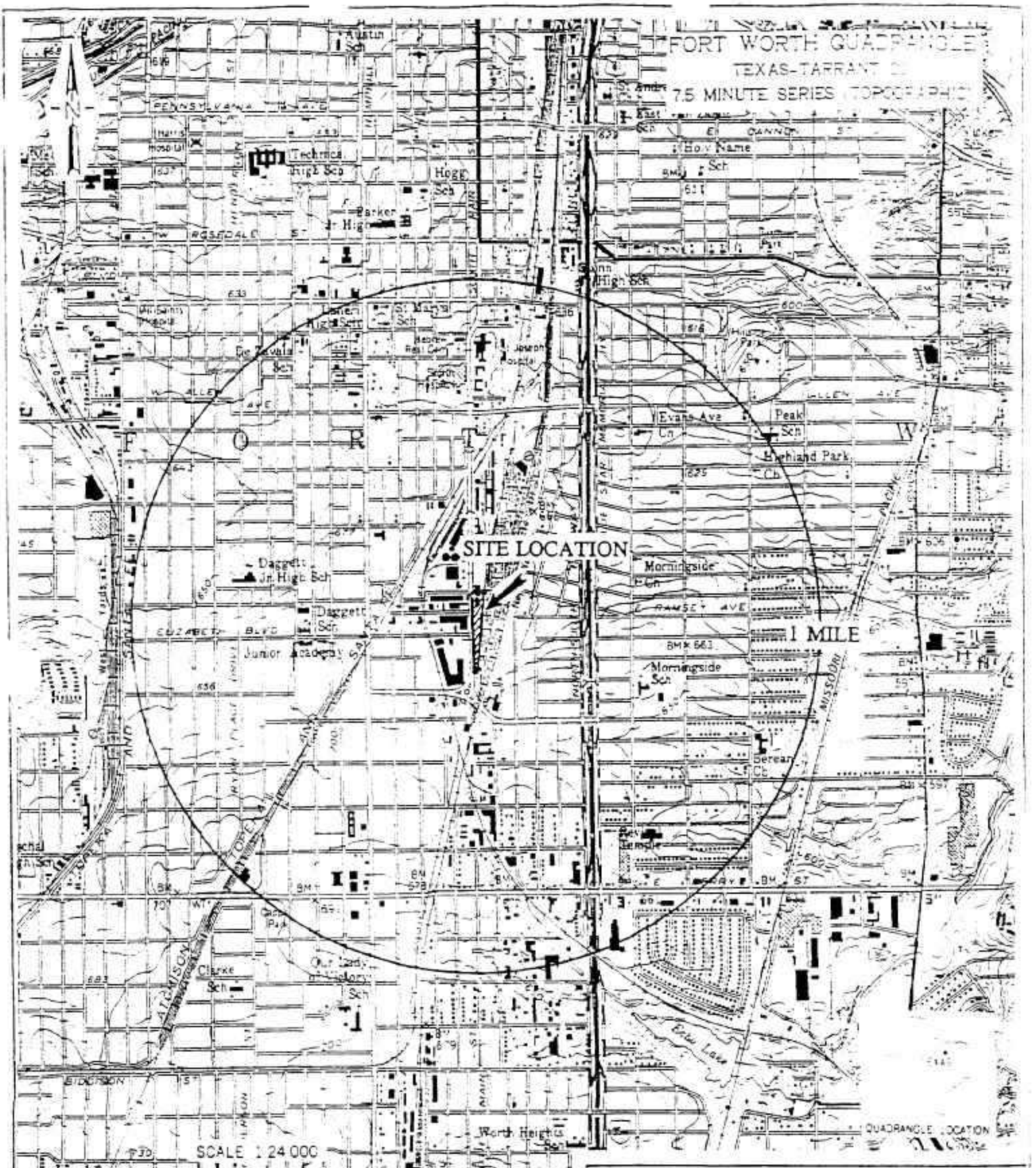
RESULTS OF INSPECTION

During the referenced February 26, 1995 Region 4 O&M inspection, the writer contacted Mr. Larry P. Marquardt, owner of the adjacent business, who maintains keys to the outside gates for the site. The writer requested copies of these keys. During the subsequent site inspection, the writer noted site security was adequate (see attached site diagram and photographs), but that the site was not posted. The concrete cap in the northern portion of the site was noted intact and all seams were in good repair. The concrete cap in the southern portion of the site was noted in good condition and no evidence of seepage or erosion was noted. All seams along the top of the southern cap were noted in good condition.

RECOMMENDATION

Concerning the results of the investigation, recommend that site security be enhanced by properly posting the perimeter fence. In addition, copies of gate keys to the two outside gates were requested from the adjacent business owner.

Attachments



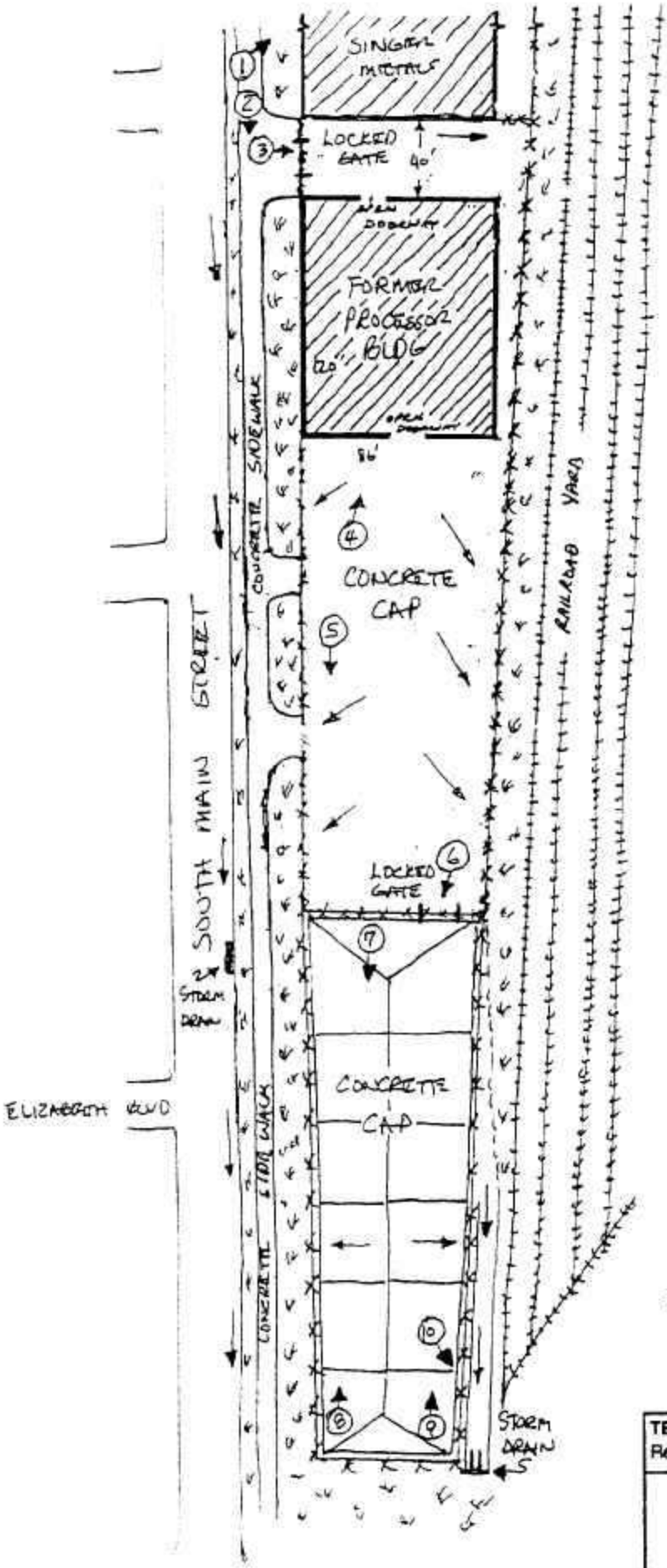
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Ft Worth

Surrounding Land Use Map

TXD None

Tarrant County



N

NOT DRAWN TO SCALE

KEY

① → PHOTO & DIRECTION

GRASS OR NATURAL VEGETATION

→ DRAINAGE PATTERN

SITE VISIT!

2/26/96

BT

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Ft Worth
Site Sketch

TXD None Tarrant County

Photo #1 - The adjacent business located north of the site shown above. The owner maintains a set of keys to the outside gates. Photo taken facing east.

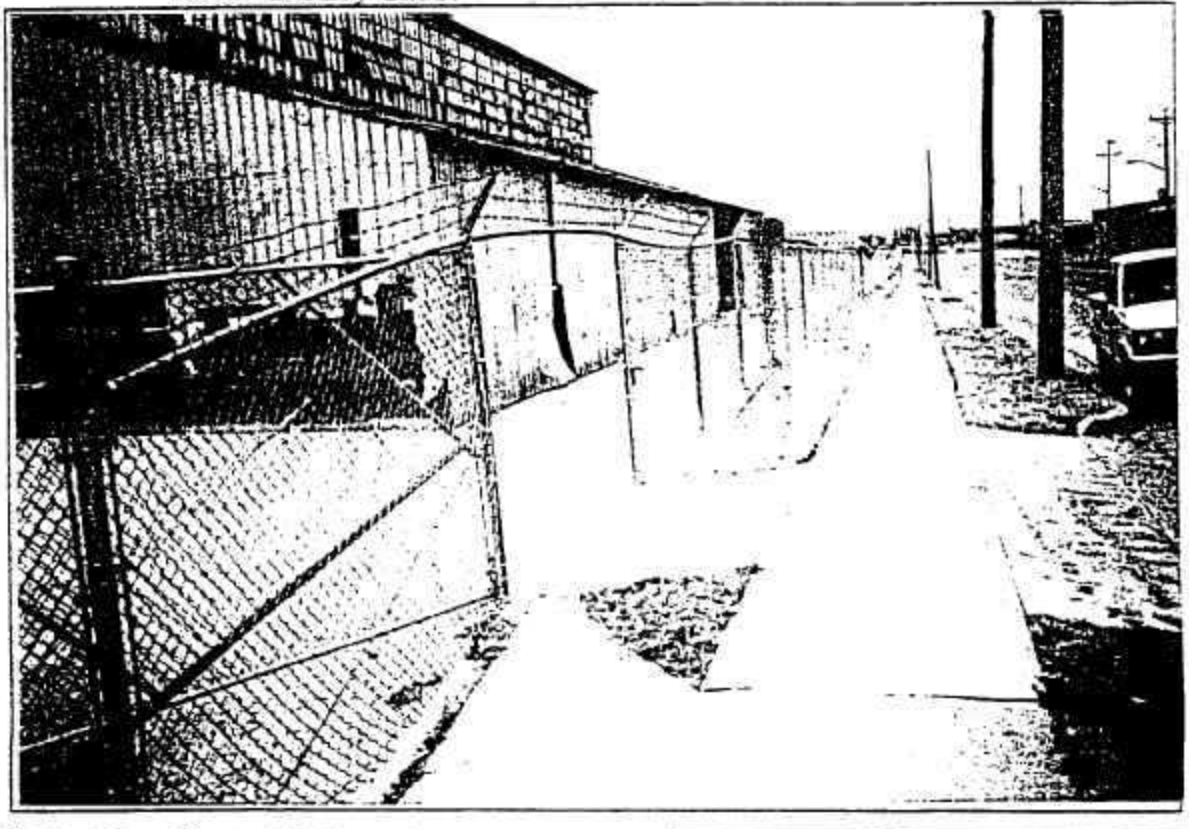


Photo #2 - Photo of the site entrance from South Main St. showing entrance gate shown above. Photo taken facing south.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Fort Worth
CCD None
Site Visit: 2/26/96
Site Investigator: C. D. Thompson

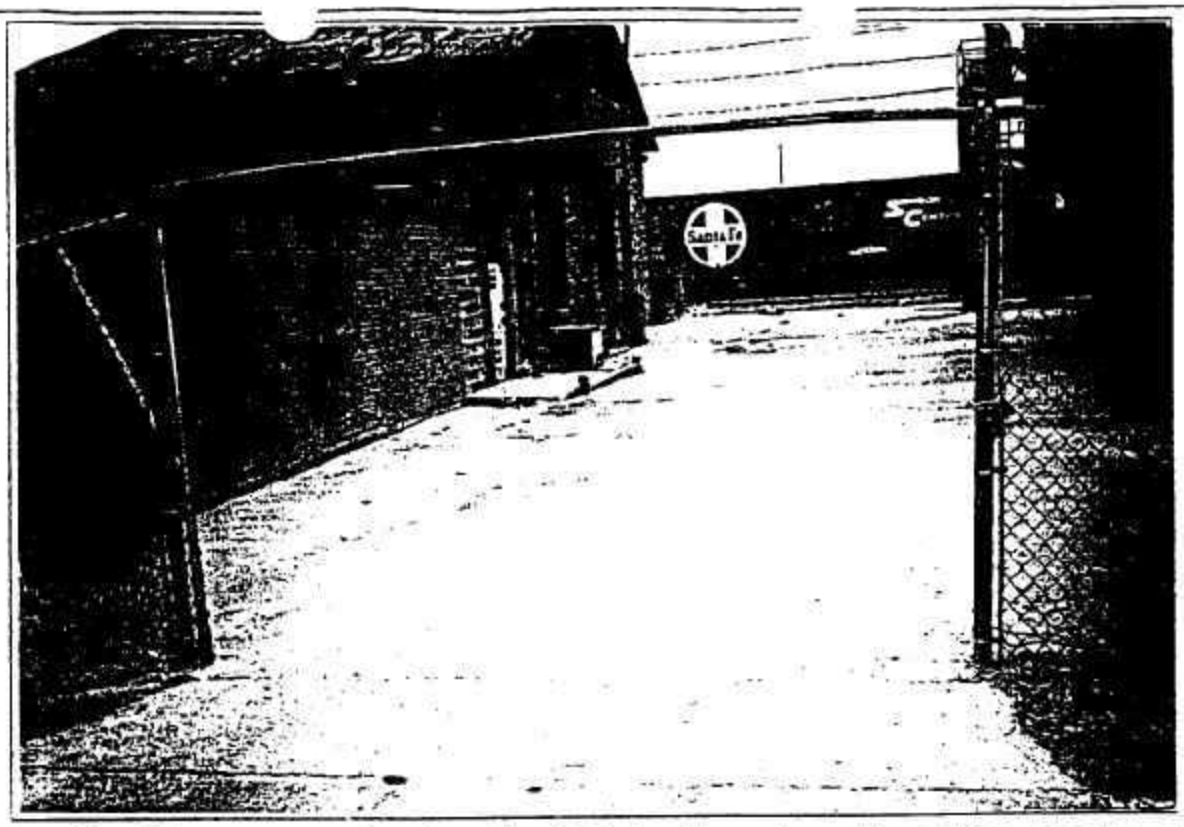


Photo #3 - Entrance to site from South Main St. and north portion of site shown above. The adjacent business (Singer Metals) is shown on left. Railroad track (background) bound the site on the east side.

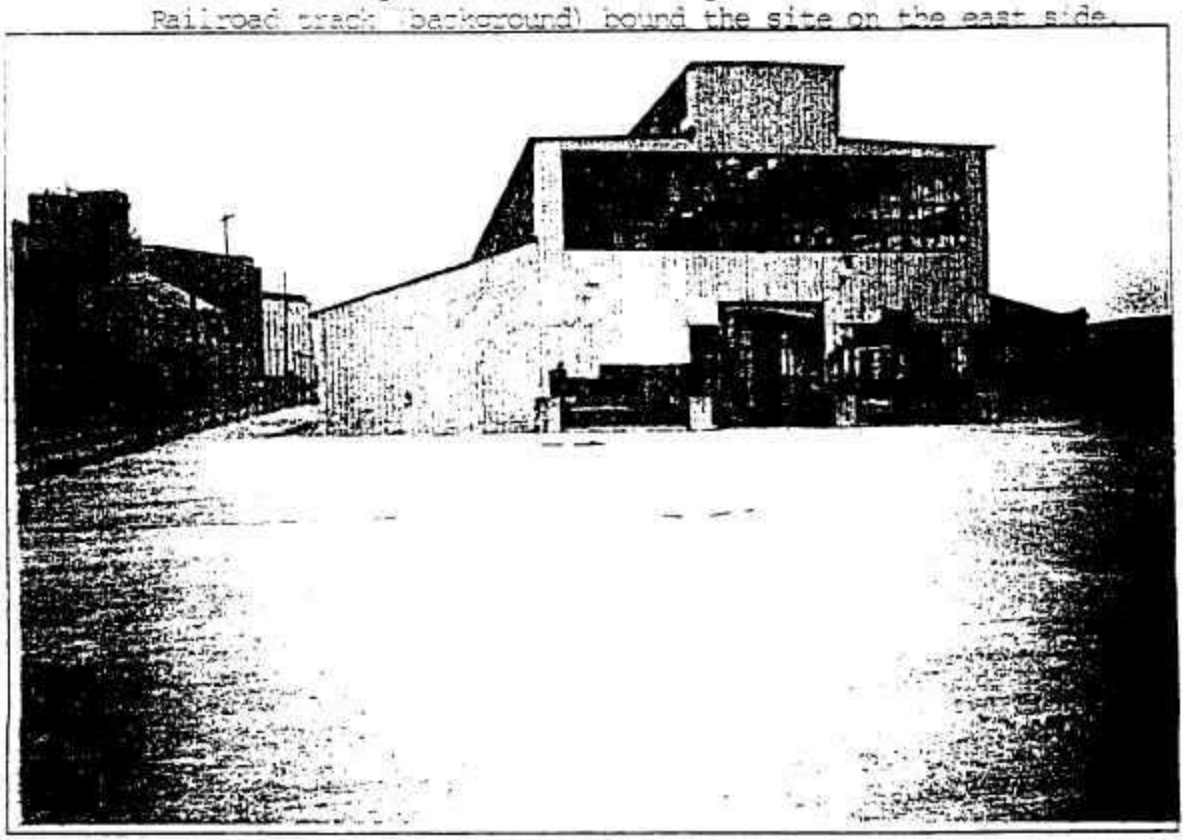


Photo #4 - South side of former processing bldg shown above. Window were noted broken from high winds. Glass noted swept up. Concrete area noted free of cracks and no evidence of seepage noted.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Fort Worth
CN: None
Site Visit: 2.10.98
Site Engineer: [illegible]

TNRCC-0614

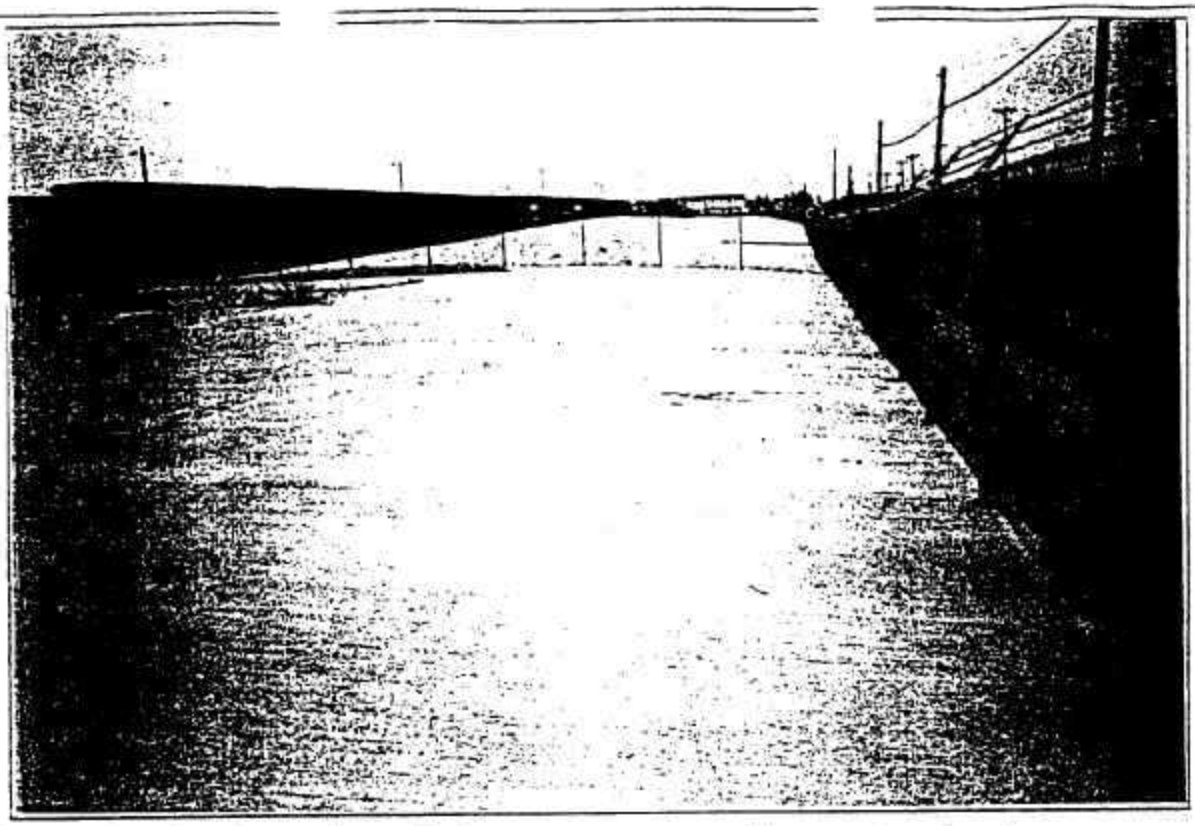


Photo #5 - South portion of the concrete area adjacent to the former processing building shown above. No cracks or evidence of seepage noted along the west side of the property. Photo taken facing south.

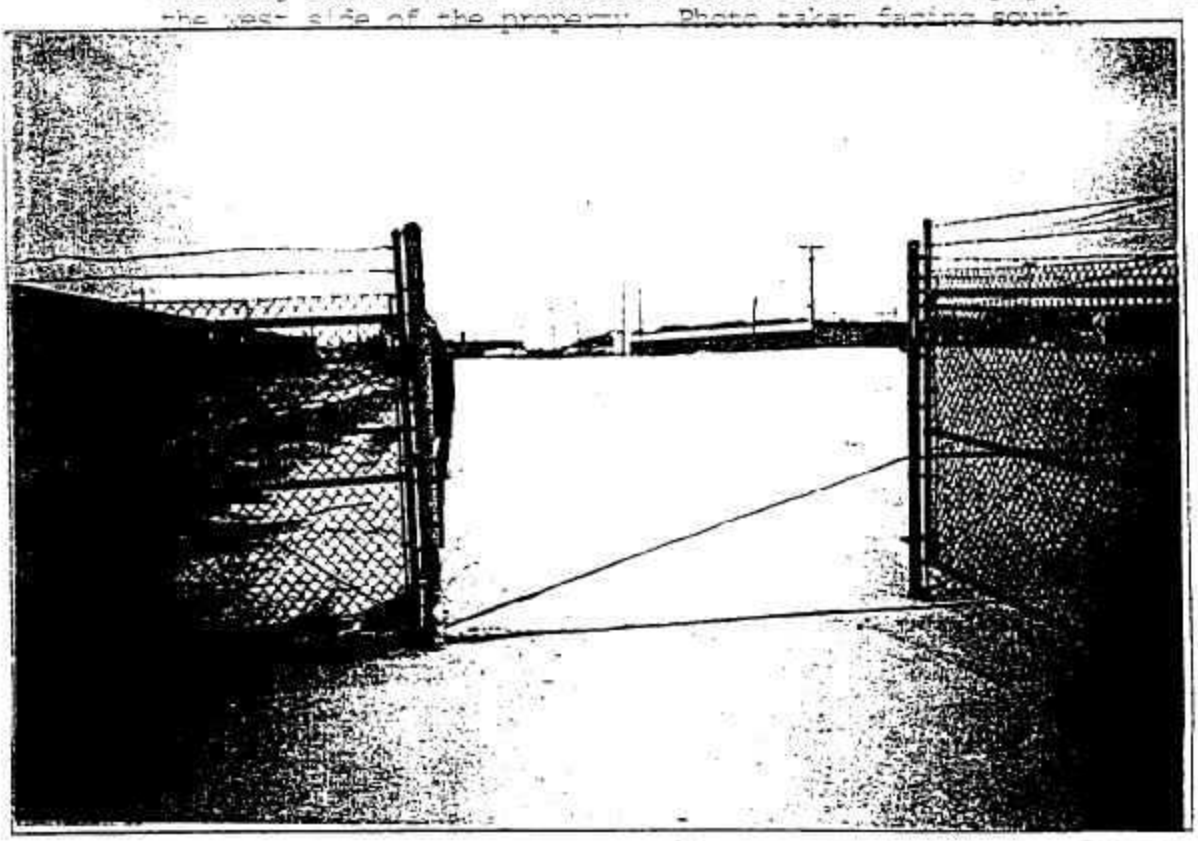


Photo #6 - Capped portion entrance gate shown above. Keys maintained by TNRCC Region 4 Office, Ft. Worth. Perimeter fence noted intact and site was secure. No Trespassing signs were not posted.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Pesses Chemical Co.
2301 South Main Street, Fort Worth
TXD None
Site Visit: 2/26/96

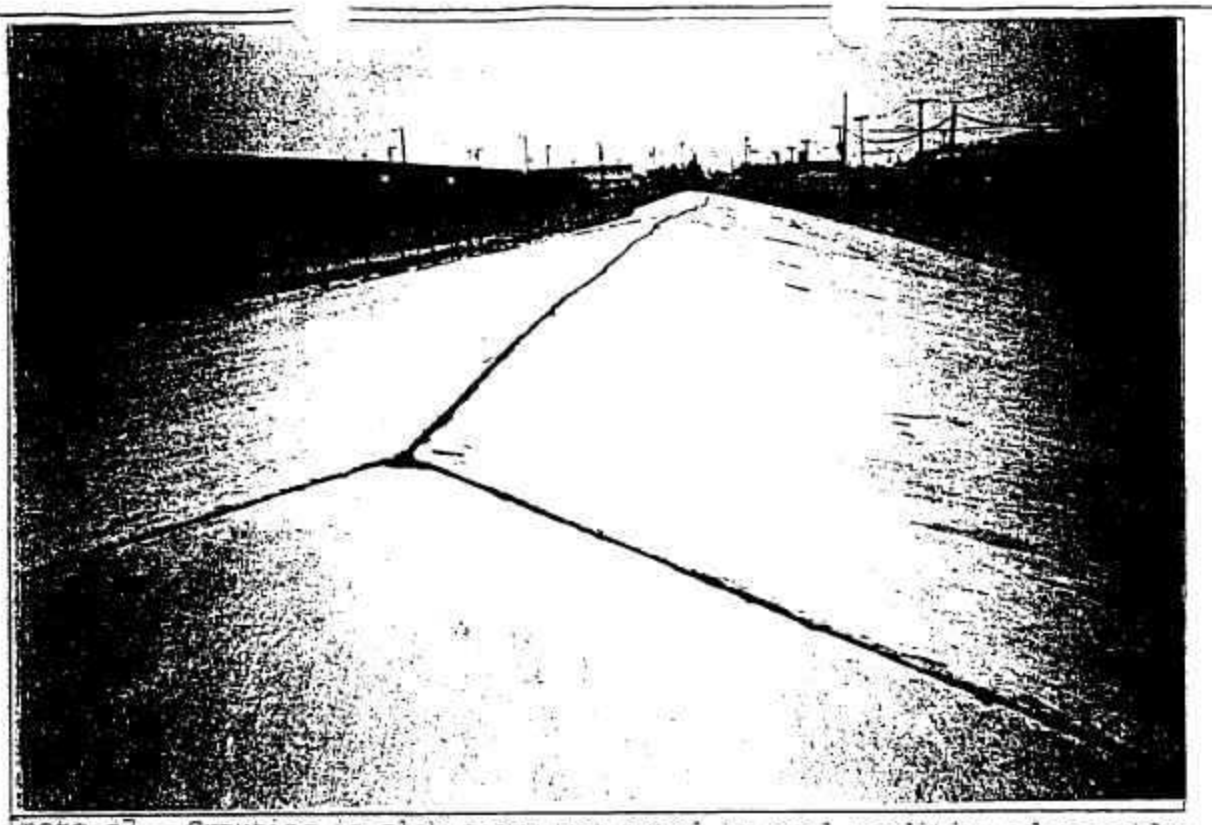


Photo #7 - Grouting in slab seams was noted in good condition along sides and top as shown above. Photo taken facing south from north end of cap.

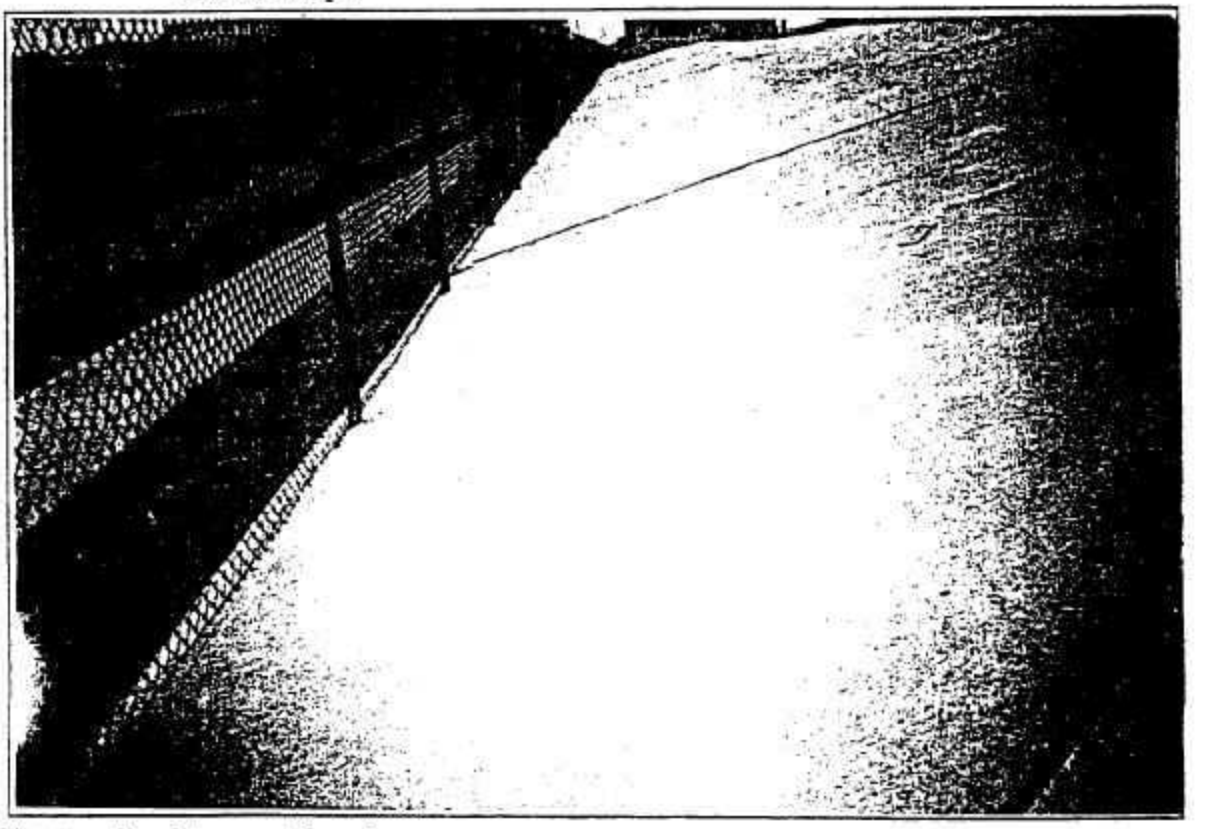


Photo #8 - West side of cap was noted clean with no cracks or evidence of seepage along the edges as shown above. Photo taken facing north.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No. 4

Possess Chemical Co.
2001 South Main Street, Fort Worth
TYD None
Site Visit: [illegible]

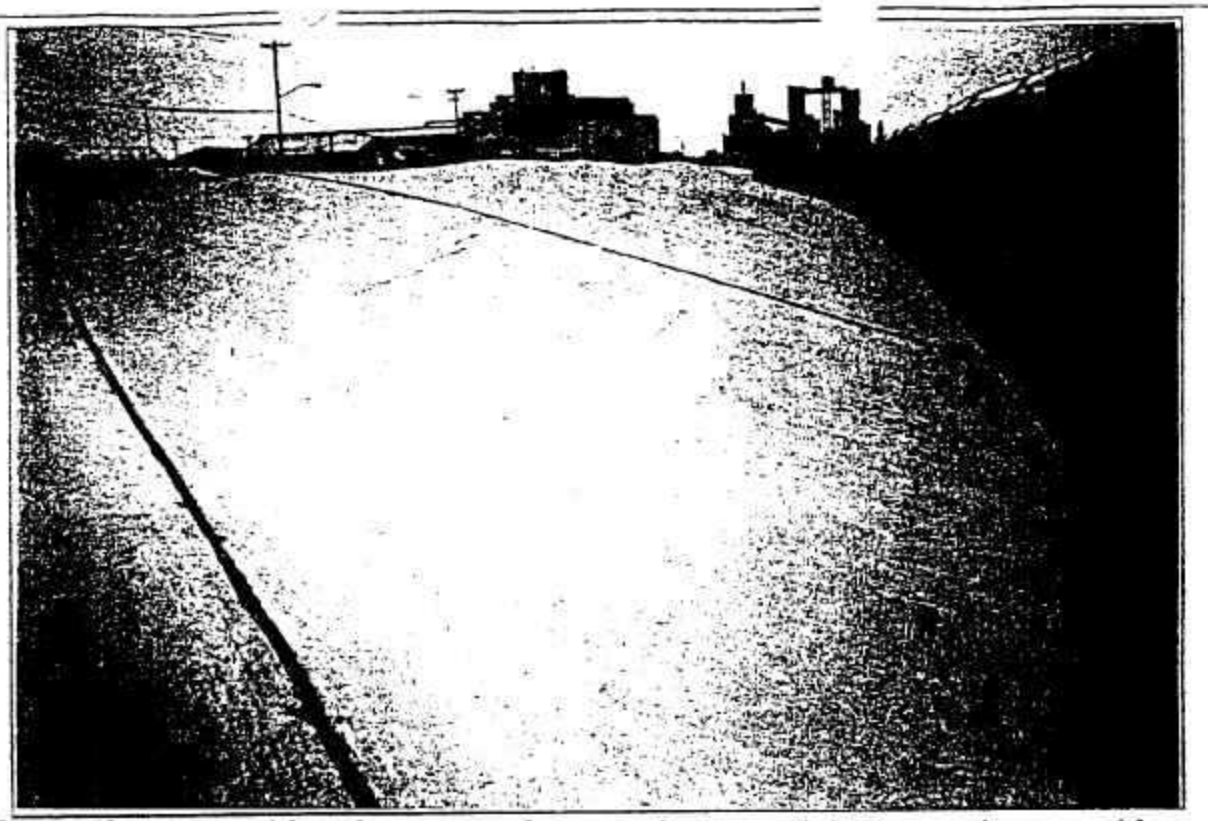


Photo #9 - East side of cap was also noted clean with no cracks or evidence of seepage along edges as shown above. Photo taken facing north.

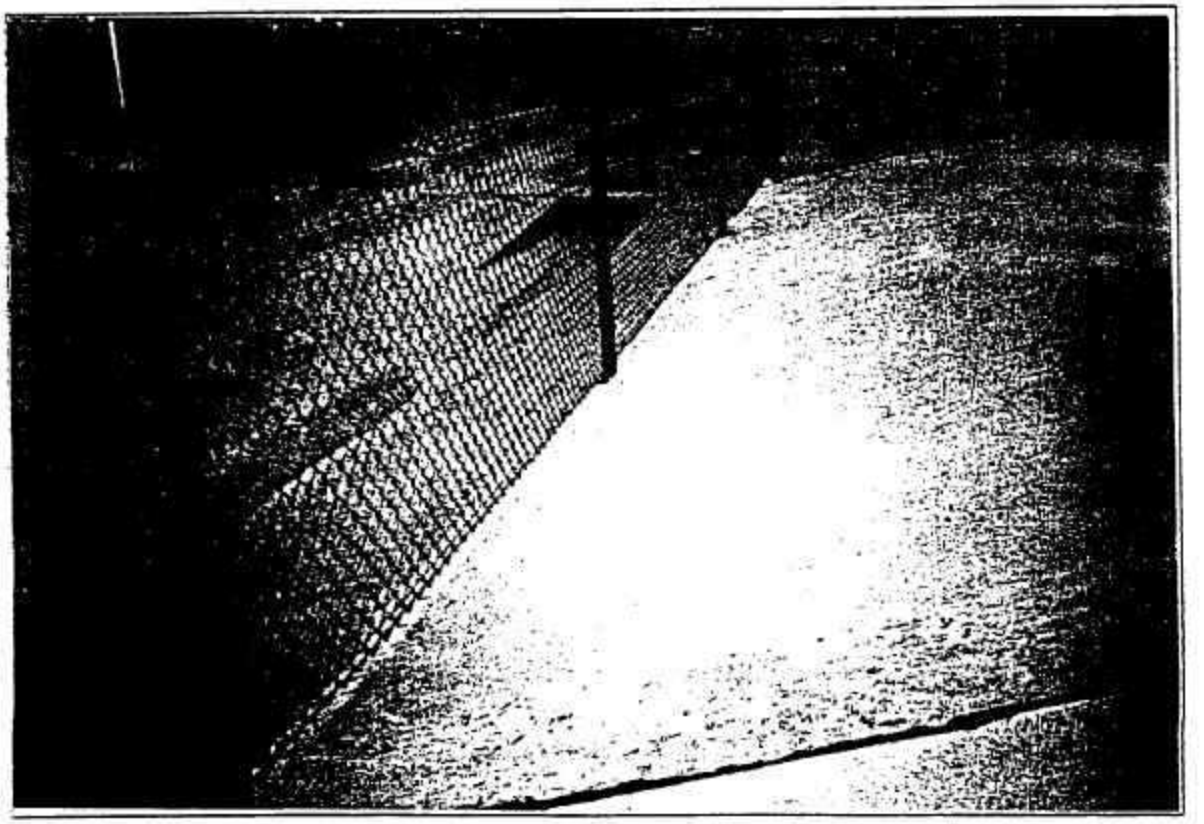


Photo #10 - The storm drain located on the southeast corner of the site shown above. No evidence of seepage entering the drainage pathway along the east perimeter of the site was noted. Photo taken facing southeast.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Region No 4

Pesses Chemical Co.
2301 South Main Street, Fort Worth
TMD None
Site Visit: 1.20.96
Site Rep. Present: T. D. Thompson

PESSES CHEMICAL COMPANY
SUPERFUND SITE
FIVE YEAR REVIEW
CONCURRENCE AND APPROVAL

13 JUNE 2000

Earl Hendrick Date
Project Manager

6/21/00

James L. Turner Date
Senior Attorney, ORC

14 June 2000

Gustavo Chavarria Date
Chief, AR/OK/TX Program Section

06/21/00

Mark Peycke Date
Superfund Branch Chief, ORC

6/16/00

William Honker, P.E. Date
Chief, AR/OK/TX Branch

6/23/00

June Buzzell, 6SF Date

Approved:

7/21/00

Myron O. Knudson, P.E. Date
Director, Superfund Division