

TCEQ Response to the Citizens for Environmental Justice Conclusions from the First Phase II Sampling Event of the Hillcrest Community Environmental Investigation

March 2011

During the February 24, 2011 public meeting, Citizens for Environmental Justice (CFEJ) representative George Rice presented his conclusions from data generated from the October 2010 Hillcrest Community Environmental Investigation (HCEI) Phase II soil and groundwater sampling event conducted in the Hillcrest neighborhood by the TCEQ and EPA. The following are the TCEQ's responses to those conclusions:

CFEJ Conclusion 1: Since 2006 the volume of the LNAPL plume beneath the refineries has been reduced by approximately 12 million cubic feet (90 million gallons). During that time, the refineries have pumped less than 1 million cubic feet of LNAPL from beneath their facilities. Thus, pumpage by the refineries has contributed little to the reduction in LNAPL plume volume.

TCEQ Response: The TCEQ is not familiar with the statistic cited or methodology used to arrive at this conclusion. According to the latest October 15, 2010 Inner Harbor Ship Channel Joint Groundwater Monitoring Report, the total NAPL recovered among the inner harbor refineries was an estimated 30,035,733 gallons of total NAPL recovered since 1993. TCEQ requires that the Responsible Parties continuously strive to optimize the performance of the recovery systems.

CFEJ Conclusion 2: Groundwater flows from the Flint Hills East and CITGO East refineries, into the Hillcrest Neighborhood.

TCEQ Response: Although the groundwater gradient has a general easterly component towards the Hillcrest neighborhood, the active remediation systems in the refinery sector have proven to be effective in containing the groundwater contamination as is evidenced by the stability of the plume. Despite the age of the hydrocarbon release and the east-northeast groundwater gradient, the LNAPL plume has not expanded into the residential sector and is contained within the facility boundaries.

CFEJ Conclusion 3: Contaminated groundwater from the refineries has migrated into the Hillcrest Neighborhood.

TCEQ Response: Areas of groundwater contamination observed beyond the boundaries of responsible party facilities were not residential areas. The responsible parties have been directed to expand their assessment and/or remediation efforts in response to this new data. These newly discovered areas of contamination do not present any health hazard as there is no open pathway for exposure (the groundwater is not potable) and the contaminant levels were well below applicable health-based benchmarks.

CFEJ Conclusion 4: The groundwater in the Hillcrest Neighborhood is a valuable resource that should be protected.

TCEQ Response: TCEQ agrees with this conclusion. Although the affected groundwater is not potable due to its very high salinity, TCEQ has directed the responsible parties to expand their assessment and/or remediation efforts to address these newly discovered areas of contamination.

CFEJ Conclusion 5: Pumping wells should be installed along the boundary between the refineries and the Hillcrest Neighborhood to reduce or eliminate the migration of contaminated groundwater into the neighborhood.

TCEQ Response: TCEQ agrees with this comment. TCEQ directed the responsible parties in the Fall of 2010 to proactively install three additional recovery wells within and near the facilities boundaries to enhance the existing recovery well systems. These additional recovery wells will be installed and fully operational by June 2011. There are already approximately 171 recovery wells in the refinery sector actively containing and removing source contaminants from the groundwater.