



February 2006

San Angelo Electric Service Company Proposed State Superfund Site

Community Relations Plan

On the Web:

www.tceq.state.tx.us/remediation/superfund

COMMUNITY RELATIONS PLAN

for the

San Angelo Electric Service Company (SESCO) Proposed State Superfund Site
San Angelo, Tom Green County, Texas

February 2006

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Appendices

Public notice announcing the San Angelo Electric Service Company (SESCO) proposal to the state Superfund Registry and land use public meeting; published in the December 2, 2005, edition of the *Texas Register* and in the December 6, 2006, edition of the San Angelo Standard-Times

Site Location Map

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Overview of Community Relations Plan

This community relations plan (CRP) identifies issues of community concern regarding the San Angelo Electric Service Company (SESCO) proposed state Superfund site (SESCO), located in San Angelo, Tom Green County, Texas. This community relations plan also outlines the anticipated community relations activities to be conducted during each phase of the cleanup at the SESCO site.

The SESCO Community Relations Plan has been prepared to aid the Texas Commission on Environmental Quality (TCEQ) in developing a community relations program tailored to the needs of the community affected by the SESCO site. The Texas Commission on Environmental Quality will conduct community relations activities to ensure that the local public has input to decisions and access to information about Superfund activities at the SESCO site.

The Texas Commission on Environmental Quality has the responsibility for managing the cleanup of this site, and the Texas Commission on Environmental Quality Remediation Division will oversee all community relations activities at the site.

(Note: The state predecessor agencies: Texas Water Quality Board (TWQB), Texas Department of Water Resources (TDWR), Texas Water Commission (TWC), Texas Air Control Board (TACB), and the Texas Natural Resource Conservation Commission (TNRCC), referred to throughout this document are now known as the Texas Commission on Environmental Quality (TCEQ). The new agency name, TCEQ, became effective September 1, 2002, as mandated under House Bill 2912 of the 77th Regular Legislative Session.)

Site Profile

Site Location:
31° 28' 15.2" North Latitude,
100° 25' 19.4" West Longitude
926 Pulliam Street, San Angelo, Tom Green County, Texas

Site background and operating history:

Site Description

The San Angelo Electric Service Company (SESCO) was founded in 1932 as a motor magneto and starter repair company. The current operation, located on a three acre facility in northeastern San Angelo, Texas, has been building, repairing and servicing electrical transformers. Polychlorinated biphenyls (PCBs), a hazardous man-made fluid once added to the oil used in transformers, was discovered in the soil and groundwater both on and off the SESCO property. Land use around the facility is mixed residential and commercial/light industrial. The San Jacinto Elementary School is across the street.

Site History:

In 1986, at the direction of the Texas Water Commission (TWC), SESCO sampled a former plant water supply well located within the facility and determined that the groundwater in the well was contaminated with PCBs. The water well had no surface protection and appeared as a round hole in the concrete floor in the corner of the Untanking and Disassembly building. Wash water and oils washed from the floor were disposed of in this open water well, which was later converted to into monitoring well.

In April 1994, SESCO entered into an Agreed Order with the Texas Natural Resource Conservation Commission (TNRCC) which required SESCO to conduct an investigation and remediation of any contamination originating from their property. The 1994 Order has been the subject of litigation between SESCO and the Office of the Attorney General, on behalf of the TCEQ.

September 6, 2002, the 126th Travis County District Court granted the TCEQ a Temporary Injunction that required SESCO to undertake further soil and groundwater investigation at the facility, effective on September 4, 2002. Prior to this litigation, SESCO had conducted some soil and groundwater investigation and remediation activities.

SESCO filed for Chapter 11 bankruptcy in January 2003.

March 3, 2003 as documented in a March 6, 2003 TCEQ Region 8 Industrial and Hazardous Waste Sampling report, SESCO discharged approximately 400 gallons of transformer oil across their property, along Baze Street, and into the Texas Department of Transportation (TxDOT) storm water collection system which flows into the Concho River. The oil contained PCBs.

March 4, 2003, TCEQ staff provided SESCO with an oral directive to take immediate action to mitigate a recent release of oil from the facility. The oral directive was followed by a written directive on March 5, 2003. Both the oral and written directives instructed SESCO to take immediate action to mitigate the above referenced off-site soil contamination because the conditions at the facility constituted an imminent and substantial endangerment to human health and the environment.

From March 4-6, 2003, the TCEQ's Emergency Response (ER) Team was called in to begin cleaning up the PCB-contaminated oil from the street and storm sewer. While cleaning up the PCB oils, the TCEQ emergency response contractor also dealt with the contaminated soil along the public areas outside the SESCO fence line. Sampling began off-site for residents, the San Jacinto Elementary School, TxDOT right-of-way on Pulliam Street, the Pope and Tarver Street outfall, and the City right-of-way on Baze Street.

March 5, 2003, SESCO discharged 5500 gallons of wastewater and transformer oil into the City of San Angelo Wastewater Treatment Plant causing an upset. The City of San Angelo Wastewater Treatment Plant Superintendent contacted the TCEQ concerning the undetermined amount of oil the wastewater treatment plant (WWTP) received. The Superintendent reported that a thick scum had developed and was continuing to develop on the surface of the aeration basins, a citrus smell and oil smell was noted by the plant personnel, and an oily sheen was on the surface of the treatment units. Mr. Thenappan, former owner of SESCO, and SESCO personnel stated that the wastewater from the oil/water separator tank was discharged directly to the sanitary sewer system and not directed to a second oil/water separator. Samples of the transformer oil which was released to the WWTP were collected at the wastewater tank outlet and the sampling manhole. Analysis indicated a PCB level of 5.10 mg/kg in the oil from the tank. The sample from the manhole indicated below detectable levels of PCBs in the sewage.

TCEQ Region 8 staff met with Mr. Thenappan and verbally demanded SESCO to immediately cease and desist all activities associated with all off-site soil contamination originating from the discharge. Mr. Thenappan was informed that the TCEQ would contact their emergency response contractor to respond and address the contamination.

March 6, 2003, samples of the soil in the ravine were collected to determine extent of contamination from the unauthorized discharge at SESCO. Nine soil samples were collected at various locations in the ravine. Sample analysis indicated PCBs in all soil samples along the ravine (i.e., 0.249 mg/kg, 0.180 mg/kg, 0.130 mg/kg, 0.134 mg/kg, 0.194 mg/kg, 0.242 mg/kg, 0.132 mg/kg, 0.164 mg/kg, and 0.303 mg/kg). One water sample was collected at the junction of the ravine and the Concho River. Analysis indicated PCBs were below the detection limit in the water sample.

March 7, 2003, SESCO personnel conveyed to TCEQ that the amount of transformer oil discharged to Baze Street was around 400 gallons versus the original 100 to 200 gallons originally reported. SESCO personnel noted that Monitor Well 1 recovered approximately 5-10 gallons of oil since operations began. There was an unauthorized discharge of transformer oils through cracks in secondary containment. The TCEQ Emergency Response Strike Team members mobilized to the facility.

March 8, 2003, the TCEQ continued excavation activities along Upton and Baze Streets. An abandoned 18 inch clay pipe storm drain was located on Baze Street approximately 25 feet north of SESCO's north entrance on Baze Street. One end of the pipe ended in the City of San Angelo right-of-way on Baze Street, where bricks had been piled in front of the open end. The pipe runs west from the right-of-way to an unknown point on SESCO property. The emergency response contractor removed the pipe flush with SESCO's east fence and covered the end of the pipe with plastic. The decision based on sample results was made to excavate the soils, to a depth of five feet, at the point where the pipe had ended in the Baze Street right-of-way.

March 10, 2003, the TCEQ ER Strike Team arrived and conducted sampling at the school and the SESCO east yard runoff. At each sample location two samples were collected (i.e., a surface sample and a six inch deep sample) at the adjacent soccer field and the east yard. Soil samples were obtained from thirteen different locations on and near the soccer field. Therefore, a total twenty-six samples were collected on or near the soccer field. The SESCO east yard fence line and drainage was sampled. A total of twelve different sample locations were collected at the fence, in the TxDOT railroad culvert, and adjacent to the rail line on the east side in the drainage. A total of twenty-four samples were collected on or near the SESCO east yard fence line. The PCB concentrations detected in the surface samples ranged from 3.24 to 318.0 mg/kg. The PCB concentrations detected in the samples collected at six inches deep ranged from 5.07 to 246.0 mg/kg.

From March 11-13, 2003, the TCEQ conducted a walking water well survey and a distribution line sampling event a quarter mile outside of the SESCO facility. A total of 145 residents were surveyed. If the resident was not home, a flyer was placed on the door by TCEQ staff. Fifteen wells were found during the survey. Three additional wells were located after residents notified the TCEQ Region 8 office. Of the fifteen wells, six were sampled for benzene, toluene, ethyl benzene, and xylene (BTEX) and PCBs. The remaining nine were dry or had equipment located in the well and therefore were not sampled. The City of San Angelo water distribution system was also sampled in order to determine if any PCB contamination had infiltrated the distribution system. A total of six sample locations were sampled throughout the quarter mile area. The wells were geographically located to get a wide distribution throughout the survey area. The sample locations were analyzed for total chlorine, PCBs, and BTEX. The water well and distribution line sample results were below detectable limits for PCBs and BTEX.

During March 17-18, 2003, the TCEQ identified and confirmed that SESCO had an unauthorized discharge from leaking Batch Tanks 1-8.

March 18, 2003, the Office of the Attorney General and SESCO entered into an Agreed Temporary Injunction which superceded the September 4, 2002 Temporary Injunction. Due to previous inadequate response actions on the part of SESCO that compounded the contamination problems in the area, the Agreed Temporary Injunction in State Court ordered SESCO to immediately cease all soil investigation and remediation activities. The Agreed Temporary Injunction required SESCO to allow the State access to the facility to identify potential sources of the groundwater contamination and to allow temporary storage of contaminated materials from the State's response actions at the facility. The Temporary Injunction required SESCO to post signs in Spanish and English to provide public notice in instances where potential exposure to contamination in areas accessible to the public may occur, and required SESCO to notify adjacent land owners of the availability of sample results and of actual or probable exposure to contamination, in accordance with the requirements of the Texas Risk Reduction Program rule. The Temporary Injunction also required SESCO to allow the State to remove and dispose of wastes and oils at the facility to allow leak-testing of tanks, lines, sumps, and other parts of SESCO's systems at the facility, and required SESCO to allow the State to operate, modify, or improve the groundwater recovery system. The April 12, 1994 Agreed Order remained in effect.

March 20, 2003, the TCEQ notified SESCO to move all transformers along the east yard fence line so a containment berm could be constructed. All leaking transformers were not to be moved.

March 24, 2003, a TCEQ investigator observed an open leaking transformer on the SESCO property. The surrounding soils were stained and had killed the vegetation growth. The transformer was labeled as junk yet contained transformer oil. A stick in the container was used to verify the presence of transformer oil.

March 27, 2003, TCEQ noticed that the leaking transformer, identified on March 24, 2003, had been moved. The new location of the leaking transformer had stained soil. In the process of moving the transformer, oils were spilled on the ground and stained the soil. Two separate holes were detected during the removal of sludges from the oil plant sump.

March 28, 2003, a previously unidentified landfill was located in the east yard, and well MW8 tank was discovered to have had an overflow of transformer oil.

April 1, 2003, state contractors began removing sludges from the oil plant tanks and continued the evacuation of line for the preparation of tightness tests. The horizontal tanks, H1 and H2, appeared to be leaking.

April 2, 2003, SESCO had an unauthorized discharge of sand blasting waste to the environment during normal operation.

April 3, 2003, TCEQ began discharge of approximately 7,000 gallons of wastewater to city sewer with prior approval. All piping was turned off to the horizontal tanks due to dropping of fluid levels.

April 4, 2003, TCEQ commenced the excavation of 2,000 cubic yards of on-site soil. These soils required removal to abate human exposure and migration. The TCEQ completed discharging wastewater to the city, evacuated the horizontal tanks, and filled a tote for SESCO with the transformer oil from H1.

April 7, 2003, the removal was completed for the excavated soils, sludges, and drill cuttings from the facility. The excavated areas were backfilled with clean soil. The removal of the waste transformer oil from the onsite TCEQ dual compartment tank was initiated. The tops were placed on BTI-8. Sludges were removed from V5 and V6 and the oil and sludges were evacuated from VI-V4. The lines associated with H1 and H2 were evacuated.

April 8, 2003, the remaining waste transformer oils from the TCEQ dual compartment tanks were evacuated and cleaned. Attempts were made to evacuate all waste liquids associated with the sump holes. Tightness tests were applied to oil lines which failed to hold. The TCEQ completed the containment berm to prevent surface runoff at SESCO's property east of Baze Street.

During the week of April 14-19, 2003, the TCEQ performed air monitoring activities at the facility to evaluate possible wind blown hazardous substances.

From April 21 -26, 2003, a fence was constructed around the alley between SESCO and Browning Street and warning signs were placed on the TxDOT railroad right-of-way on the east side of the facility. The oils and sludges from the frac tank were removed. The TCEQ removed accumulated rainwater from the secondary containment systems.

During April 28 -May 3, 2003, the TCEQ performed the following activities: (1) installed wells MW26-MW30, (2) plugged wells MW2, MW3, MW6, and MW9, (3) reviewed operating records for the facility with EPA, (4) gauged wells with the interface probe, and (5) sampled phase separated hydrocarbons (PSH) in wells MW28, MW29, and MW30.

During the week of May 5 -10, 2003, the TCEQ installed monitoring wells MW31, MW32, and MW33 and plugged the 150 foot well identified as MW5.

During May - August 2003, the EPA conducted additional soil sampling on and off site, sampling and inventory of transformers on-site, and dye testing of facility pipelines.

June 3, 2003, a Rule 11 Agreement was signed stating that the Assistant Attorney General agreed that SESCO may pump rainwater to tank V-4 where the material may phase separate; the wastewater may be disposed of consistent with the permit SESCO has with the City of San Angelo.

June 13, 2003, the TCEQ via a letter requested SESCO to conduct remediation of off-site affected properties located adjacent to SESCO. SESCO did not respond.

August 29, 2003, SESCO voluntarily filed for Chapter 7 bankruptcy.

October 6-8, 2003, Superfund Site Discovery and Assessment Program (SSDAP) personnel and their contractors conducted the pre-inspections, alley trimming, and assessment sampling prior to soil removal actions. Assessment samples were collected from the following locations: 418 N. Browning Street, 421 N. Browning Street and the San Angelo Independent School District (SAISD) soccer field, located at 800 Spaulding, along the City of San Angelo right-of-ways (1) on the south side of Upton Street between N. Browning and Baze Street; (2) on the north side of Upton Street between the Texas Pacific Railroad and N. Baze; (3) between Texas Pacific Railroad and Pulliam Draw; and (4) east and west sides of Baze between the southern grids sampled at the soccer field and Pulliam Street. The contractors also videotaped the residences and performed a 6-point elevation survey at the residences.

From October -November, 2003, over 1300 letters were sent out to companies and individuals as the initial stage of the Potentially Responsible Party (PRP) search. In these letters, the TCEQ requested information on any involvement between the receiver of the letter and SESCO and notified these parties of needed clean-up activities.

In November 2003, SSDAP mobilized to conduct the off-site soil removals at the residences, alley, and the soccer field. Under the 40 CFR 761.61, the cleanup level for bulk PCB remediation waste in high occupancy areas is less than 1.0 milligram per kilogram.

November 11, 2003, the excavation of contaminated soil of the alley and 418 N. Browning property began. The excavation at 416 N. Browning backyard was completed on November 14, 2003. Restoration at the residences was completed on November 19, 2003. Alley restoration was completed on November 20, 2003.

December 2, 2003, excavation at the soccer field began. Removal of contaminated soil concluded on December 10, 2003. On December 18, 2003, backfilling and restoration was completed at the soccer field and right of ways.

January 5, 2004, the state contractor conducted the post-inspections at the residences, researched deed information for the alley, and surveyed in the alley.

January 6-7, 2004, San Angelo Independent School District and City of San Angelo Parks Department signed the soccer field post-inspection checklist to finalize the removal activity.

January 16, 2004, over 700 boxes of SESCO records were transported off-site under the supervision of the Office of State Attorney General.

February 1, 2004, TCEQ SSDAP officially began operation of the SESCO ground water recovery system.

March 30, 2004, The total volume of product recovered through hand-bailing and the ground water treatment system was 4,052 gallons.

April 8, 2004, A preliminary meeting was held to discuss the legal, administrative and technical status of the site, particularly relating to the Superfund process, to explore options for cleanup, and to facilitate the formation of a "PRP Committee."

April 29, 2004, The Hazard Ranking System (HRS) Record was completed.

May 6, 2004, The site was referred to the State Superfund Program.

May 12, 2004, A meeting was held to discuss the status and future of the site. SSDAP, Superfund Cleanup Section (SCS) and Legal TCEQ staff were present as well as representatives of the SESCO Working Group.

December 17, 2004, Memorandum of Agreement (MOA) was executed between the Texas Commission on Environmental Quality, and the members of the SESCO Working Group.

February 2005, TCEQ gave the SESCO site Working Group a 4 month extension making the PRP information is now due June 15, 2005.

March 2005, TCEQ provided site soil information to TxDOT for their use in railroad right of way construction. Reviewed and commented on the revised Memo of Agreement between TCEQ and the PRP Working Group.

April 12, and 13, observed the installation of 2 wells to replace the inoperable MW-15. Two wells were required because of the existence of 2 groundwater regimes.

May 2005, An analysis of the surface water determined that the PCB concentrations were below the MOA discharge limit of 0.5mg/l. Previous analysis determined that the arsenic concentrations were non-detect. The site groundwater extraction and separation system continued to be operated efficiently.

June 2005, Monitoring of the private wells, as required by the Memorandum of Agreement, had been completed and results continued to show no impact from the site. The site groundwater extraction and separation system continue to be operated efficiently.

August 2005, SCS met with members of the PRP Working Group. Current management of the site (security, maintain groundwater recovery system) was agreed to be adequate and will continue until a new order is signed. The PRP Working Group indicated it appeared certain that the PRP group would proceed with the cleanup in Superfund.

September 2005, The groundwater recovery system was shut down between 30 August and 2 September while the filters for the oil water separator were being replaced.

October 2005, The list of potentially responsible parties was been sent from TCEQ Legal to TCEQ Remediation.

November 2005, TCEQ Remediation drafted and submitted the proposal for listing and land use classification notice to the Texas Register and a local newspaper for publication on December 2, 2005. Remediation Division has obtained a meeting location for the January 12, 2006 public meeting in San Angelo. Six Hundred Seventy Seven (670) Potentially Responsible Party notification letters and requests for Good Faith Offers were mailed by November 28th. Remediation is answering calls which are responding to those letters. Remediation will continue preparations for the public meeting to propose the site for listing in January.

Community Profile

In July 2004 the U.S. Census Bureau estimated the population of Tom Green County at 103,772, a 0.2% decrease from the 2000 U.S. Census estimate. The 2000 ethnicity estimates of Tom Green County by the U.S. Census were: Anglo 63%; Hispanic or Latino origin, 30.7%; Black or African American 4.1%; Asian, 0.9%; American Indian and Alaska Native, 0.7%; Native Hawaiian and Other Pacific Islander, 0.1%.

The 2000 U.S. Census estimated the population of San Angelo at 88,439. The 2000 ethnicity estimates of the City of San Angelo by the U. S. Census were: White, 77.1 %; Hispanic or Latino (of any race), 33.2%; Some other race, 14.0%; Black or African American, 4.7%; Two or more races, 2.5%; Asian, 1.0%; American Indian and Alaska Native, 0.7% and Native Hawaiian and Pacific Islander, 0.1%.

The 2000 U. S. Census provided the following profile for the industry in San Angelo: educational, health and social services 23.7%; Retail trade, 13.7%; Arts, entertainment, recreation, accommodation and food services, 8.8%; Manufacturing, 8.2%; Professional, scientific, management, administrative, and waste management services, 7.5%; Construction, 6.4%; Other services (except public administration), 6.2%; Public administration, 6.0; Information, 5.9%; Finance, insurance, real estate, and rental and leasing, 5.5%; Transportation and warehousing, and utilities, 3.0%; Wholesale trade, 2.6%; Agriculture, forestry, fishing and hunting, and mining, 2.5%.

Community Involvement and Concerns

The TCEQ conducted a public meeting in San Angelo on January 12, 2006, to receive public comment regarding the proposal to include the SESCO site in the state Superfund program. There were no comments or questions received from area residents or property owners at the public meeting.

The TCEQ has not received any questions or comments regarding the SESCO site, from area residents or property owners, since the January 2006, public meeting.

Specific Objectives of the Community Relations Program

- A. Maintain open communications between the Texas Commission on Environmental Quality and area residents, as well as City of San Angelo, Tom Green County and State officials.
- B. Continue to expand the mailing list to include additional agencies, organizations, and residents that are interested in the project.
- C. Provide a community relations contact from whom interested parties can receive information on site activities, project status, and study results.
- D. Provide all information, especially technical findings, in a language that is understandable to the general public and in a form useful to interested citizens and elected officials through the preparation of fact sheets and news releases, when major findings become available during project phases.
- E. Monitor community concerns and information requirements as the project progresses.
- F. Modify the community relations plan to address changes in community needs and maintain accuracy during different project phases.
- G. Provide for and attend public meetings.
- H. Respond to telephone inquiries and written correspondence in a timely, accurate manner.

Community Relations Techniques

- A. Project status briefings for community groups and concerned citizens (may include public meetings, if needed) - To periodically inform the general community of significant project developments and findings; to respond to inquiries accordingly and incorporate local concerns into the decision making process as appropriate.
- B. Project mailing list - To provide the means through which press releases, project status reports and other significant communications can be distributed to concerned groups and individuals.
- C. Public consultations - To conduct informal meetings (if needed) with residents. To provide an opportunity for affected residents to express any concerns and to make inquiries to ensure effective two-way communication.
- D. Program Document Repository - To maintain an easily accessible repository through which the public may review project outputs.
- E. TCEQ State Superfund Internet Homepage - To provide current, timely information on state Superfund activities on the World Wide Web at: <http://www.tceq.state.tx.us/remediation/superfund/index.html>.
- F. Community Relations Plan - To reflect changes in site activities or local concerns. After the proposed remedial action document (PRAD) has been issued, the community relations plan will be revised to address implementation of the selected remedial action alternative.

Area Elected Officials

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Project Document Repositories

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