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Community Relations Plan

for

Tricon America, Inc.

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January 1995

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COMMUNITY RELATIONS PLAN
for
REMEDIAL INVESTIGATION AND FEASIBILITY STUDY

**Tricon America, Inc. State Superfund Site
Crowley, Tarrant County, Texas**

January, 1995

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OVERVIEW OF COMMUNITY RELATIONS PLAN

This community relations plan (CRP) identifies issues of community concern regarding the Tricon America, Inc. (Tricon) site located in Crowley, Tarrant County, Texas. It also outlines the anticipated community relations activities to be conducted during the Remedial Investigation and Feasibility Study at the Tricon site.

The Texas Natural Resource Conservation Commission (TNRCC) has responsibility of planning and implementing the required community relations activities at the Tricon site.

The Tricon community relations plan has been prepared to aid the TNRCC in developing a community relations program tailored to the needs of the community affected by the Tricon site. The TNRCC will conduct community relations activities and give the public access to information about State Superfund activities at the Tricon site.

The information in this plan is based primarily on the Hazardous Ranking Package. The information will be updated periodically during the course of the cleanup.

SITE PROFILE

1. Site Location and Description

The Tricon site occupies approximately five acres at 101 East Hampton Road, within the city limits of Crowley, Texas. The site is bordered by the Atchison-Topeka and Santa Fe Railroad tracks and a manufacturing facility to the west, Hampton Road to the south and a partially wooded field to the north owned by Harbison-Fischer. The east side of the site is abutted by residences and a City of Crowley maintenance yard. Deer Creek, a small creek in the watershed of Lake Arlington, is within 150 feet of the northern boundary of the site.

2. Background and Operating History

In 1970 a company by the name of Taylor Made Fats purchased the property and operated alone on the site until 1978 when Aluminum Sales, Inc. started business on the north side of the property as an aluminum and zinc melting and casting facility. In 1981 Taylor Made Fats sold the property to Aluminum Sales and its sister company and successor, Met-Pro, Inc. who

operated the site until 1984 when Met-Pro went bankrupt. In 1985, Tricon America, Inc. purchased the property and manufactured small portable concrete buildings and assembled fiberglass buildings on-site until its bankruptcy filing in 1989. Mr. H.T. Priddy, Jr. is the current site owner.

A large ash pile believed to have been deposited during 1978 to 1984 is located on the edge of a cliff on the north side of the site boundary. The ash pile contains heavy metal contamination and is estimated to contain 12,000 cubic yards of material. Sample analyses of the ash, soil and sediment samples show concentrations of heavy metals including lead, cadmium and chromium. Total lead concentration in the ash pile is found in some samples at up to 13,000 parts per million (ppm). One sample taken from the ash pile exhibited the hazardous waste characteristic of EP toxicity for lead, containing 27 mg/liter of lead. A second sample taken from the ash pile exhibited the hazardous waste characteristic of EP toxicity for lead and cadmium and contained 5.15 mg/liter of lead and 4.05 mg/liter of cadmium. Heavy metals were also detected in sediment samples in Deer Creek near the Tricon site and in ponds downstream of the facility.

In April 1990, the ash pile was stabilized with a tar-like sealant. In November-December 1990, the ash pile was capped with a 40 millimeter plastic liner which was covered with "Tri-Lock" blocks. The stabilization and capping was conducted by the U.S. Environmental Protection Agency.

TNRCC PAST SITE ACTIVITIES

Activities Related to Petroleum Storage Tanks (PST)

- 1) 2/89 McCurdy Street (i.e., 517 & 521) residents reported gasoline vapors. Removal of three underground storage tanks (UST's).
- 2) 4/89 Texas Water Commission (TWC), predecessor agency to TNRCC, conducted an investigation at the residences along McCurdy Street. Twenty soil borings and two test pits were installed. Soil Vapor Extraction (SVE) systems were installed at 571 and 521 McCurdy and began operating in May, 1989.
- 3) 9/89 TWC installed 10 soil borings in the backyards of the residences along McCurdy Street. The borings were converted to monitor wells. Three of the wells indicated the presence of hydrocarbons in the subsurface soils and ground water.
- 4) 2/90 Texas Department of Health conducted indoor air monitoring at the houses on the west side of McCurdy Street. Results indicated no indoor air contaminants.
- 5) 3/91 TWC conducted further investigation in which twelve borings were installed on McCurdy street residences and the Tricon property with ten being converted to monitor wells. The majority of the contamination in the soil coincided with the northeasterly ground water flow direction. Of the thirteen wells and two SVE recovery wells which could be sampled, four showed total BTEX concentrations above the detection limits with concentrations of 11, 12, 24, and 980. Detection limits ranged from 0.2 to 0.8 ppb. TPH as gasoline was detected in 7 of the 15 samples with concentrations of 47, 69, 110, 170, 180, 310, and 4400.

Groundwater Technology operated the SVE system and measured hydrocarbon vapor concentrations from 9/89 to 2/91. During this time vapor concentrations remained low and stable.
- 6) 1/92 TWC contracted with Groundwater Technology to perform a Risk Assessment estimating the potential for adverse health impact assuming worst case conditions related to the PST's. The results for non-carcinogen hazards ranged from 0.1 for an adult to 0.3 for a child. EPA states a hazard index of less than 1 is associated with no likely adverse health affects. Results for carcinogenic health affects ranged from 5.92×10^{-5} for an adult to 3.45×10^{-5} for a child. EPA states that risks ranging from 10^{-4} to 10^{-6} are considered acceptable.

Activities Related to the Ash Pile

- 1) 11/89 EPA conducted an initial site assessment of the Tricon site. Twenty-six drums primarily containing materials associated with the manufacturing of concrete structures were encountered. Air monitoring around the drums using a flame ionization organic vapor detector indicated no values above background.
- 2) 1/90 TWC District 4, Arlington office collected and analyzed stream samples from four locations on Deer Creek and 2 run-off samples for volatiles and cyanide. Results showed no volatile organics or cyanide in any of the samples.

Stream sediment samples were also collected from four locations along Deer Creek and four samples from the Harbison-Fischer livestock pond. Samples were analyzed for metals and volatiles. Results indicated metals contamination for lead, chromium, copper, and zinc in samples west of the pond. TWC concluded sediments east (i.e., downgradient) of the pond did not appear to be contaminated.

TWC collected waste pile samples and soil samples from the site. Analytical parameters include: total metals, EP toxicity metals, volatile compounds. Results indicated that the waste pile showed concentrations above regulatory criteria for EP toxicity lead (5.15 mg/l) and cadmium (4.05 mg/l).
- 3) 1/90 EPA collected fifteen samples from the ash pile and analyzed for lead, chromium, copper, and zinc. Concentrations for lead ranged from 0 - 8170, chromium ranged from 144 - 1780, copper ranged from 0 - 288 ppm, zinc ranged from 3960 - 19,800.
- 4) 11/90 EPA installed a trilock concrete block cap over the ash pile to prevent surface runoff and air borne migration of contamination associated with the ash pile.
- 5) 12/90 EPA fenced the site.
- 6) 1/91 EPA gave the Tricon site a hazard ranking score of 7.2. EPA informed the public that the Tricon site will not be included in the National Priorities list as a Superfund site.
- 7) 7/91 TWC proposed the site for listing on the State Superfund Registry.

Work on the Tricon site proper was deferred in order to access possible health implications to the residents on McCurdy Street.
- 8) 7/93 TWC upgraded existing fence and installed new fencing adjacent to the office building on the southern side of the Tricon property. Warning signs are posted along the fence every 100 feet around the site. Warning signs are posted every 50 feet along the southern boundary of the Harbison-Fischer property.

McCurdy Street Activities

- 1) 10/91 TWC samples McCurdy Street residences for metals. Of the metals tested (i.e., aluminum, cadmium, chromium, copper, lead, nickel, and zinc) only one sample showed a metal concentration exceeding normal background concentrations for these metals. 525 McCurdy had one sample exceeding 500 ppm lead (i.e., 631 ppm). The sample was retested and showed a concentration of 758 ppm.
- 2) 4/92 TWC deemed it necessary to perform a more extensive sampling event due to the contaminated sample found at 525 McCurdy Street. TWC collects 15 additional soil samples from 525 McCurdy Street. One sample showed a lead concentration of 748 ppm.
- 3) 7/93 TWC, in response to the two contaminated samples found at 525 McCurdy Street, contracted with EmTech to remove approximately 2,000 cubic yards of soil from the backyard of 525 McCurdy Street. Based upon the contaminated soil locations, a quarter circle with a radius of 50 feet extending outward from the northwest corner of the backyard was deemed sufficient to remove all contaminated soils. The depth of the excavation was approximately one foot across the area of concern. Eleven verification samples were taken at various locations from the bottom of the excavation and analyzed for total lead. Lead concentrations of the eleven samples ranged from 4.9 ppm to 46.8 ppm. Two samples of the backfill soil to be placed into the excavation were analyzed for total lead. Concentrations of lead in the two samples were 5.3 and 8.2 ppm. The entire excavated area was backfilled with the clean soil and sodded with bermuda grass. The soil excavated from the backyard is stored in 337 drums and housed on wooden pallets in a metal building on the Tricon site.

RECENT ACTIVITIES AT THE TRICON SITE

- 1) 10/93 A scope of work request was made by the Texas Natural Resource Conservation Commission (TNRCC), successor agency to the TWC, to INTERA, an environmental consulting firm in Austin.
- 2) 2/93 TNRCC approved the revised SOW submitted by INTERA and requested that a workplan be submitted.
- 3) 3/94 INTERA submitted the Phase I remedial investigation workplan for TNRCC approval.
- 4) 4/94 TNRCC submitted comments on the workplan.
- 5) 5/94 After some discussion with INTERA regarding the Phase I workplan, the TNRCC requested additional sampling and amended the workplan accordingly.
- 6) 4/94 - Present Phase I of the Remedial Investigation conducted by Intera

COMMUNITY PROFILE

The Tricon site is located in Crowley, Tarrant County, Texas. Crowley is located ten miles south of downtown Fort Worth on IH-35 West.

According to the 1994-95 Texas Almanac, the population of Crowley is 7,211. There is some manufacturing businesses in Crowley, but the town is primarily a "bedroom community" of Fort Worth, meaning most residents work in Fort Worth and reside in Crowley.

COMMUNITY INVOLVEMENT

There have been two public meetings regarding the Tricon site. The first, September 26, 1991, was to discuss the proposed listing of the site for State Superfund. Forty-two persons attended the first meeting.

The second public meeting, Tuesday, May 10, 1994 was to discuss the site investigation. Twenty-one persons attended the second meeting.

Area residents, especially those living on McCurdy Street, have been very cooperative in allowing TNRCC to sample their yards and to provide historical information.

KEY COMMUNITY CONCERNS

Questions and comments brought up by residents at the May '94 public meeting:

- M Drums removed from 525 McCurdy are being stored on-site. Are these secured from trespassers?
- M Factual information of health effects;
- M Will a health study or health survey be done?
- M Can adults, who were exposed to the site as children, be tested?
- M What are the real estate disclosure laws or rules for dealing with a site such as this?
- M What type of air borne contaminants come from nearby Aztec, a galvanizing operation?
- M Will TNRCC be testing for and acting on only high levels of lead found in soil?
- M Contamination in sediment of Deer Creek;
- M Residents are concerned that local elected and business officials are more concerned with community image than with residents' health;
- M What are the exact contents of the ash pile?

SPECIFIC OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

1. Maintain open communications between the Texas Natural Resource Conservation Commission: Tarrant County Officials, Crowley City Officials, State Officials; and concerned citizens.
2. Continue to expand and update the mailing list to include additional agencies, organizations, and residents that indicate interest in the project.
3. Provide a central information contact from whom interested parties can receive information on site activities, project status, and study results.
4. Provide citizens, involved agencies, elected officials, and the media with accurate, timely information about the scope, progress, and findings of site related activities by issuing press releases and conducting community meetings.
5. Respond to concerns by telephone, written correspondence and attending public meeting; interested parties can express concerns and make inquiries to ensure effective two-way communication.
6. Provide all information, especially technical findings, in language that is understandable to the general public and in a form useful to interested citizens and elected officials through preparing fact sheets and news releases when major findings are made available during project phases.
7. Monitor community concerns and information requirements as the project progresses by monitoring community response to news releases and community meetings.
8. Modify the Community Relations Plan for changes in community attitudes and needs as necessary to be accurate during different project phases.

COMMUNITY RELATIONS TECHNIQUES

These techniques are not intended to be a chronological listing.

1. Project Status Briefing for State and Local officials -- To periodically inform State and Local official of project developments over the course of the program during the investigations and findings and as project developments occur.
2. Project Status Briefings for community groups and concerned citizens and community meetings -- 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.
3. Press releases/Press conferences -- To periodically inform the general community of project status, i.e., significant changes or developments related to schedule, scope, and/or objectives (may be done concurrently with item 2.)
4. Project Status Reports: a) Formal program document; b) TNRCC meetings -- To formally summarize the status of findings of the project at designated intervals.
5. 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.
6. Public Consultation -- Conduct informal meetings or workshops with residents. To provide an opportunity for affected residents to express any concerns and make inquiries to insure effective two-way communication.
7. Program Document Repository -- To maintain a local repository through which the public may review project outputs.
8. State Superfund Report -- Direct mail to state, local and county official and interested persons.
9. Revise CRP -- To reflect changes in site activities or local concerns. After the Selection of Remedy has been issued, the CRP will be revised to address implementation of the selected remedial action alternative.

ELECTED OFFICIALS LIST

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817/861-9333

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The Honorable David Counts, Chairman
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The Honorable Warren Chisum, Chairman
Texas House Committee on Environmental
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Crowley Review

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Dallas Morning News

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PROGRAM DOCUMENT REPOSITORY

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