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# **HRS DOCUMENTATION RECORD**

for

## **Materials Recovery Enterprises Ovalo, Texas**

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**August 15, 1995**

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# MATERIALS RECOVERY ENTERPRISES, INC. SITE HAZARDOUS RANKING PACKAGE

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# HAZARDOUS RANKING PACKAGE SITE SUMMARY

Facility Name: Materials Recovery Enterprises, Inc. Site

Location: The Materials Recovery Enterprises, Inc. Site ("the site"), aka MRE is located 1/4 mile north of FM 604 and 1/2 mile east of us 183 approximately 4 miles southwest of Ovalo, Taylor County, Texas. The site coordinates are 32°07'53" north latitude and 99°51'17" west longitude. (see Attachment 3.2)

Site Legal Description: The land on which the site is located is composed of five contiguous tracts of land situated on the County of Taylor, State of Texas, being parts of the J.C. Eccles Survey, section 472, Abstract Number 58. All tracts are particularly described below. All bearings refer to the Texas Plane Coordinate System, North central Zone.

## TRACT No.1:

A tract of land situated in the County of Taylor, State of Texas, being part of the J.C. Eccles Survey (A-58), and being more particularly described as follows, all bearings being referred to the Texas Plane Coordinate System North Central zone

From the southwest corner of said J.C. Eccles Survey, same being the northwest corner of the J.W. Stewart Survey (A-253), north 70° 06' east, 3,053 feet to a point of beginning;

THENCE north 87° 42' west, 600 feet to a point for the southwest corner of this tract;

THENCE north 02° 18' east, 600 feet to a point for the northwest corner of this tract;

THENCE south 87° 42' east, 600 feet to a point for the north corner of this tract.

THENCE south 02° 18' west, 600 feet to the point of beginning containing 8.26 acres, more or less.

## TRACT No.2:

A tract of land situated in the County of Taylor, State of Texas, being part of the J.C. Eccles Survey (A-58), and being more particularly described as

follows, all bearings being referred to the Texas Plane Coordinate System, North Central Zone:

COMMENCING at the southwest corner of said J.C. Eccles Survey (A-58), same being the northwest corner of the J.W. Stewart Survey (A-253);

THENCE north 75° 06' east, a distance of 3,053 feet to a point;

THENCE north 87° 42' west, a distance of 600 feet to a point;

THENCE north 02° 18' east, a distance of 600 feet to a point;

THENCE south 87° 42' east, a distance of 180 feet to the point of beginning.

THENCE north 02° 18' east, a distance of 200 feet to a point;

THENCE south 87° 42' east, a distance of 200 feet to a point;

THENCE south 02° 18' west, a distance of 200 feet to a point;

THENCE north 87° 42' west, a distance of 200 feet to the point of beginning, containing an area of 0.92 acre, more or less.

TRACT No. 3:

A tract of land situated in the County of Taylor, State of Texas, being part of the J.C. Eccles Survey (A-58), and being a strip of land varying in width between stations 0+00 and 0+ 50 (Station 0+00 being situated in the north right-of-way line of FM Road No.604), being 200 feet in width, 100 feet on each side of the centerline at station 0+00, and 100 feet in width, 50 feet on each side of the centerline at station 0+50, and being 100 feet in width, 50 feet on each side of the centerline between stations 0+50 and station 8+59.6; said centerline being more particularly described as follows, all bearings being referred to the Texas Plane Coordinate System, North Central Zone:

FROM the southwest corner of said J.C. Eccles Survey, same being the northwest corner of the J.W. Stewart Survey (A-253), south 88° 35' east, 2,666 feet to the point of beginning; said point of beginning being situated in the north right-of-way line for FM Road No.604, and being station 0+00 of this centerline;

THENCE north. 02° 18' east, 859.6 feet to a point for the end of this centerline, said point being situated in the south boundary line of and 8.26 acre tract designated as Tract No. 1; said point being north 87° 42' west, 250 feet from the southeast corner of said Tract No.1; said strip of land

containing 2.03 acres, more or less.

Tract No.4:

A tract of land situated in the County of Taylor, state of Texas, being part of the J.C. Eccles Survey (A-58), and being more particularly described as follows; all bearing being referred to the Texas Plane Coordinate System, North Central Zone:

FROM the southwest corner of the said J.C. Eccles Survey, same being the northwest corner of the J.W. Stewart Survey (A-253), south 88° 36' east, 2,575 feet to the point of beginning, said point of beginning being the western-most corner of a 2.03- acre tract designated as Tract No.3, said point being situated in the north right-of-way line of FM Road No.604;

THENCE along said right-of-way line, north 87° 43' west, 60 feet to a point;

THENCE north 44° 51' east, 162.7 feet to a point in the west boundary iine of aforesaid Tract No.3.

THENCE along said right-of-way line, north 87° 43' west, 60 feet to a point;

THENCE south 47° 18' west 70.7 feet to the point of beginning containing 0.13 acre, more or less.

Tract No.5

A tract of land situated in the County of Taylor, state of Texas, being part of the J.C. Eccles Survey (A-58), and being more particularly described as follows, all bearings being referred to the Texas Plane Coordinate System, North Central Zone:

FROM the southwest corner of the said J.C. Eccles Survey, same being the northwest corner of the J.W. Stewart Survey (A-253), south 88° 34' east, 2,770 feet to the point of beginning, said point being the easternmost corner of a 2.03-acre tract designated as Tract No.3, said point being situated in the north right-of-way line of FM Road No.604;

THENCE along the easterly boundary line of said Tract No.3 north 42° 42' west, 70.7 feet to a point;

THENCE north 02° 18' east, 69.85 feet to a point;

THENCE departing from the boundary line of said Tract No.3 south 40° 15' east, 162.7 feet to a point in the south boundary line; said boundary line being the north right-of-way line of FM Road No.604.

THENCE along the north right-of-way line of FM Road No.604, north 87° 43' west, 60 feet to the point of beginning, containing 0.13 acre, more or less. (see Attachment 3.3}

**Person(s) in charge of the facility:**

Registered Agent: Mr. Charles G. Wilmut  
Materials Recovery Enterprises, Inc.  
11171 Harry Hines Blvd., Suite 111  
Dallas, Texas 75229

Director of Compliance: Mr. Pete Bolig  
4835 LBJ Freeway, suite 450  
Dallas, Texas 75324  
214/934-8990

Name of Preparer:~          Signed          *Date: 8/10/95*  
Monica McCarthy, Geologist  
Superfund Site Discovery  
and Assessment Team

Name of Reviewers:          Signed          *Date 8/28/95*  
Wesley Newberry, Leader  
Superfund Site Discovery  
and Assessment Team

    Signed          *Date 9/11/95*  
Stennie Meadours, Manager  
Emergency Response and  
Assessment Section

(The State predecessor agencies, Texas Water Quality Board, Texas Department of Water Resources, and Texas Water commission, referred to throughout this report are to be known as the Texas Natural Resource Conservation commission (TNRCC). The new agency, TNRCC became effective September 1, 1993, as mandated under state Senate Bill 2 of the 73rd Regular Legislative session)

## **General Description of the Facility:**

The Materials Enterprises Recovery, Inc. (MRE) facility is an abandoned commercial Class I hazardous waste disposal facility located 1/4 mile north of FM 604 and 1/2 mile east of the intersection of FM 604 and US Highway 83 about 4 miles southwest of Ovalo, Taylor County, Texas. (see State of Texas County Map, Attachment 1.1). The site coordinates are 32°07'53" north latitude and 99°51'17" west longitude.

The site commenced operations in March 1979 and was abandoned in late 1987. The last known reported acceptance of waste was May 1982. (see Attachment 3.4,3.5) The surrounding land use is mainly agricultural with crops being grown on the north and west side of the property and cattle being raised on the east side. The south side is undeveloped. (see Attachment 3.6)

The MRE facility "the site" consists of five tracts totaling 11.47 acres. (see Attachment 3.3) MRE, Inc. converted a decommissioned Atlas missile silo complex to receive liquid slurries from the treatment of metal finishing and electroplating wastewaters. (see Attachment 3.7, 3.8)

Six Solid Waste Management units (SWMU's) comprised of the Waste Storage silo (WSS), the Truck Unloading Platform, the Initial Evaporation Pond (IEP), the Second Evaporation Pond, the Secured Landfill and the Drum Storage Area managed the wastes. (see Attachment 3.8)

The main underground silo is approximately 52 feet in diameter and approximately 174 feet deep, extending downward from the ground surface. The silo is constructed of reinforced concrete that thickens towards the surface, with a wall thickness varying from 30 inches to 9 feet. There is evidence that indicates that the silo leaked significant amounts of water at approximately 40 feet where the electrical cables penetrated the silo walls. (see Attachment 3.7, 3.47)

The truck unloading platform is a concrete pavement platform approximately 30 feet wide by 100 feet long. It managed vehicles carrying drums or bulk wastes which were pumped directly to the WSS via a fill and vent line shaft. (see Attachment 3.8)

In addition to the silo, the company (MRE) constructed an evaporation pond to reduce the volume of the liquid fraction of the wastes. The initial evaporation pond (IEP) was clay lined with a vinyl liner and had a leak collection sump for leak detection. A tear in the liner was detected and the TDWR issued corrective action to MRE. In response, MRE constructed a second evaporation pond in the same location as the first. This pond contained two liners and was equipped with a spray evaporation system and a leachate collection and removal system. (see Attachment 3.9)

An on-site landfill was created to dispose of the remnants (damaged liner, underdrain system and contaminated soil) from the rehabilitation of the first evaporation pond. (see



Attachment 3.9) This landfill has a leachate collection unit (no records of construction are available) and liquid wastes were noted leaking into it during a January 1991 site inspection. (see Attachment 3.10)

There is little information in the files regarding the drum storage area. The exact location of this SWMU is not known. It is possible that this unit was used to store waste drums after their contents were deposited in the WSS. There was no information in the files regarding containment structures at the drum storage area. (see Attachment 3.8)

Five monitoring wells were installed to detect leakage from the WSS, but they may not monitor accurately and may not properly characterize the site specific geohydrology. No monitor wells were installed around the evaporation ponds to determine leakage into the underlying ground water. (see Attachment 3.2, 3.11)

On August 7, 1985, an Agreed Temporary Order No. 39,228-A was signed that required the closure of the facilities at the site. The terms of the Agreed Temporary Order were never accomplished and the facility was abandoned in late 1987. Prior to abandonment, the facility began evaporating silo liquid wastes in the evaporation pond (surface impoundment) while sludges remained in the silo. This activity was ceased in process, and wastes (liquid and sludges) were left in the silo. Liquid and sludge wastes also exist in the deteriorating surface impoundment. (see Attachment 3.10)

MRE received and stored wastes which were not authorized by the permit or TDWR, therefore the wastes in the silo and the pond are a complex mixture of mineral and organic acids, caustics, metals, chelators such as cyanides and ammonia, chlorinated and aromatic solvents, paint and ink wastes and pesticide wastes. (see Attachment: 3.9)

## **Background /Operating History:**

The Materials Recovery Enterprises, Inc. (MRE) site is an abandoned, commercial Class I hazardous waste disposal facility. The site was the location of a U.S. Air Force Atlas F-Class Intercontinental Ballistic Missile (ICBM) storage and launch facility in the 1960's. The Air Force constructed a single underground missile silo at the site and connected it by underground passage to an underground launch control center (LCC). The internal dimensions of the silo are 139 feet deep x 52 feet wide. The silo walls consist of reinforced concrete, ranging from 30 inches thick at the base to 9 feet thick at land surface. The LCC has a 40 foot internal diameter and extends from 10 feet above grade to 40 feet below. (see Attachment 3.2)

The Air Force decommissioned the site, and sold the property to James H. Smith on February 14, 1968. Mr. Smith used the property to graze cattle and as a storage facility. He stated that he never stored any chemicals at the site. On December 7, 1977, Mr. Smith sold the 111.47 acre property to Materials Recovery Enterprises, Inc. of Dallas

County, Texas. Mr. Smith currently lives in the Bradshaw area, approximately 2~ miles southwest of the site.

On November 18, 1977, Gutierrez, Smouse, Wilmut & Associates, Inc. (GSW & Associates, Inc.) representing Materials Recovery Enterprises, Inc. (MRE), submitted a permit application to the Texas Department of Water Resources (TDWR) for a Commercial Industrial Solid Waste Management site. (see Attachment 3.12)

On October 3, 1978, the Texas Water Commission issued a commercial Class I permit (No.39038) to MRE for an Industrial Solid Waste Management site in Taylor County, Texas. (see Attachment 3.3) A stipulation of the permit was that MRE was to construct the proposed metals reclamation facility in four phases: Phase I Modifications, including the construction of a flow metering station and a Truck Unloading Platform to the missile silo structure for the receipt of wastes. In addition, four monitoring wells were to be placed around the Waste Storage silo (WSS) Phase II -Construction of an Initial Evaporation pond (IEP)that would control the amount of liquid waste in the WSS; Phase III Construction of two additions evaporations ponds and a drum storage area: Phase IV -Construction of a chrome reduction and neutralization plant and the installation of additional ground water monitoring wells adjacent to the plant. (see Attachment 3.8, 3.13)

During thf first three phases, MRE was to treat, store and dispose of liquid slurries produced in the neutralization of acidic and caustic waste and wastewaters generated by electroplating and metal finishing industries. The waste material accepted was not supposed to contain free oxidizable cyanide, have a pH between 7.5 and 10.0, and have total hexavalent chromium concentration less than 0.5 milligrams/liter. During Phase IV, MRE would be allowed to accept untreated acidic and caustic wastes from electroplating and metal finishing industries for treatment. (see Attachment 3.2, 3.13)

MRE, however, only completed the first two phases. Phase I consisted primarily of modifying the missile silo so it could receive wastes, constructing a concrete truck unloading platform (30 feet x 100 feet) to unload wastes into the silo, and installing a flow metering stations to measure the amounts of waste deposited into the silo. This phase became operational in March 1979. Phase II was the construction of an evaporation pond to reduce the volume of supernatant liquid deposited into the silo. The pond was approximately 85 x 195 x 4 feet and was lined with a pre-fabricated liner and a clay topcoat. (see Attachment 3.2, 3.13, 3.7) Construction on the evaporation pond commence on April 21, 1980. (see Attachment 3.14)

On March 28, 1979, the TDWR gave approval for MRE to begin to accept industrial waste. (see Attachment 3.11)

On April 16, 1980, a TDWR's enforcement action report documented that MRE was in violation of their permit due an excessive amount of waste being stored in the silo. (see Attachment 3.15)

On July 29, 1980, the original owners, John P. Smouse, Albert F. Gutierrez and Charles G. Wilmut, sold their interests in MRE to Arroyo Gathering Company who retained the name Materials Recovery Enterprises, Inc. The principal officers of the Arroyo Gathering Co. are reported to be Mr. Mike K. Kirkham, Mr Jed B. Harrison, Jim Schiff, and Craig Harrison. (see Attachment 3.13, 3.16)

On September 24, 1980, the TDWR ordered MRE to repair an apparent hole in the synthetic liner of the evaporation pond that was discovered during a department inspection of the site. MRE was instructed to perform the following corrective actions; 1) remove all liquids and associated sludges from the pond by pumping it into the silo, 2) remove all solids and dispose of them in an authorized Class I solid waste site, 3) remove the damaged liner and all contaminated soils and deposit them in an authorized Class I solid waste site, 4) repair or replace the synthetic liner and underdrain system, 5) notify the TDWR at least 24 hours prior to initializing these actions. (see Attachment 3.17)

On August 11, 1981, the EPA completed processing MRE's Part A Hazardous Waste Permit Application. There is no record in the file indicating that MRE was granted Interim Status by the EPA. There is also no record in the file that Part B of the Hazardous Waste Permit Application was ever submitted to the EPA or TWC. (see Attachment 3.18)

On November 18, 1981, MRE notified TDWR that they would commence removal and disposal of the existing evaporation pond on November 24, 1981 (see Attachment 3.19)

On April 12, 1982 the landfill disposal of pond remnants was complete. (see Attachment 3.20)

On January 29, 1982, the TDWR requested that the Attorney General of Texas institute appropriate legal action for violations of the Texas Solid Waste Disposal Act, Article 4477-7, and TDWR rules by MRE, Inc. Noted violations included:

waste elevation in silo exceeded 30 feet during Phase I of facility operation,

discrepancies with waste manifestation,

failure to file written proof of additional surety bond amounts for Phase II facilities prior to placing them in operation,

hexavalent chromium concentrations in silo exceeded 0.5 mg/l as required by II.A., Permit No.39038,

failure to make timely rehabilitation of evaporation pond following detection of seepage in pond underdrain, and

failure to submit monthly ground water monitoring results as required by IV.F.7. Permit No.39038. (see Attachment 3.16)

On July 26, 1982, the TDWR documented departmental enforcement procedures against MRE to the Attorney General's Office as follows:

July 31, 1981- request for enforcement action by District 2 Office

November 25, 1981- intraagency circulation of an enforcement notice,

December 11, 1981..., referral to the General Counsel's Office, and

January 29, 1982- referral to the Attorney General's Office. (see Attachment 3.21)

On September 3, 1982, the TDWR requested the partial suspension of Permit No.39038 to disallow authorization for any further storage, treatment or disposal of waste materials not on site at the time of suspension until such time that the permittee demonstrates the ability to comply with all permit provisions. (see Attachment 3.5)

On October 6, 1982, a Public Hearing Notice was issued by the TDWR to consider a petition filed by the TDWR requesting the partial suspension of Permit No.39038 issued to MRE, Inc. (see Attachment 3.22)

On October 27, 1982, the TDWR suspended in part Permit No.39038 disallowing authorization to accept, store, treat, or dispose of any waste materials not currently on site. (see Attachment 3.23)

On November 9, 1982, MRE submitted a Closure Plan and Closure Cost Estimate to the TDWR. (see Attachment 3.24)

On December 7, 1982, the TDWR requested that the Attorney General's Office refrain, for the time being, from filing suit against MRE due to the progress made between TDWR and MRE in conducting corrective action at the facility. (see Attachment 3.25)

On January 24, 1983, TDWR gave approval for MRE's amended silo Waste Treatment Plan. (see Attachment 3.26)

On October 13, 1983, TDWR reported the results of their September 29, 1983 Compliance Inspection at the MRE facility. During the inspection, Mr. Pete Bolig of MRE told Mr. Robert Phillips, Field Representative, TDWR, that he detected a leak in the new evaporation pond liner when he began to transfer waste from the silo to the pond. The following sequence of events was taken from Mr. Bolig's operation log:

- 1) September 23, 1983 -Mr. Bolig began transfer of the waste from the silo to the evaporation pond.
- 2) September 25, 1983 -Mr. Bolig noticed a slow leak of liquid into the leak detection sump from the waste lagoon.
- 3) September 26, 1983 -Mr. Bolig observed an increase in volume of waste in the leak detection sump.
- 4) September 27, 1983 -The liquid level in the sump was above the influent pipe from the underdrain of the waste lagoon. Mr.Bolig shut off flow to the lagoon and began pumping the waste back into the silo. Approximately 79,000 gallons of waste had been pumped into the lagoon prior to shutdown. When waste was pumped from the sump, it would immediately refill with a strong surge of liquid through the pipe indicating a major leak in the liner. (see Attachment 3.27)

During the September 29, 1983 inspection, most of the waste in the lagoon had been returned to the silo. There was a few inches of liquid waste remaining in the lagoon covering about 20% of the bottom area. A low volume of waste continued to drain from the underdrain to the leak detection sump. Mr. Bolig indicated that the liner and installation was under warranty and inspection and repairs to the liner would be initiated when the lagoon was completely dry. (see,Attachment 3.27)

On March 24, 1984, the TDWR sent a Notice of Noncompliance to MRE directing them to send all management plans, schedules, and operating records to the TDWR within five (5) working days. (see Attachment 3.28)

On April 26,1984, the TDWR documented that they planned to pursue facility closure, appropriate enforcement action and revocation of MRE's permit due failed efforts to force MRE to comply with the terms and conditions of its permit. (see Attachment 3.29)

On June 18, 1984, the TDWR informed the Assistant General Counsel of its requirements for site closure at MRE. (see Attachment 3.30)

On February 21, 1985, the TDWR reported on the results of their January 29, 1985 annual solid waste compliance inspection at the MRE facility. Fourteen (14) violations of the Texas Administrative Code Industrial and Solid waste Rules were documented. (see Attachment 3.31)

On April 17, 1985, Harding Lawson & Associates provided the Attorney General's Office with a copy of MRE's final closure plan. (see Attachment 3.32)

On June 6, 1985, the TDWR requested from MRE a copy of Part B of their hazardous waste permit application in accordance with Title 31 TAC Section 341.180. (see Attachment 3.33)

On August 7, 1985, an Agreed Temporary Order between the State of Texas and MRE was signed by all parties. (see Attachment 3.34)

On February 6, 1986, the TWC reported on the results of their February 5, 1986 solid waste inspection at the MRE facility and noted the following violations:

- 1) The evaporation system was operating with no personnel on-site as required in paragraph 3.7 of the Agreed Temporary Order No. 39,228-A.
- 2) Spray drift and foam were being blown over the dike of the surface impoundment on the west and southwest side in violation of paragraph 3.7 of the Agreed Temporary Order.
- 3) Reporting deficiencies were noted in the company's operating notebook as follows:
  - a) no date and time of facility inspection,
  - b) level of liquid in the surface impoundment was not recorded daily, and
  - c) no weekly level of the liquid in the silo had been recorded. (see Attachment 3.35)

On March 14, 1986, the EPA provided the TWC a preliminary rough draft of a Complaint, Compliance Order and Notice of opportunity for Hearing for MRE. (see Attachment 3.36)

On March 24, 1986, the attorney representing MRE requested that the parties extend the Temporary Injunction for one year while MRE continued to evaporate waste at their facility. (see Attachment 3.37)

On April 18, 1986, EPA provided the TWC a copy of their Preliminary Review by ATKEARNY of the MRE facility and informed the TWC that they had dropped their rough draft of a Complaint, Compliance Order and "Notice of Opportunity for Hearing against MRE because of the agreement between MRE and TWC to close the facility. (see Attachment 3.7)

On July 2, 1986, the TWC reported on the results of their April 7, 1986 case development inspection at the MRE facility. The following violations were noted:

1. The evaporation system was operating with no personnel on site as required by the Agreed Temporary Order.
2. Spray drift and foam were being blown over the dike of the surface impoundment on the north and northeast side.

3. The company's daily operating notebook was deficient of dates and times of facility inspections and no liquid level measurements were recorded for the surface impoundment or the silo. (see Attachment 3.38)

On October 16, 1986 the TWC performed a Comprehensive Monitoring Evaluation (CME) inspection at the MRE facility which included sampling of two of the monitor wells on site. (see Attachment 3.11)

The primary constituents found in the wells were as follows:

<u>East.Well(COC#SN120Q1)</u>	<u>Concentration(ug/l)</u>
di-n- butyl phthalate	0.7
butylbenzyl phthalate	0.6
bis-(2-Ethylhexyl)phthalate	2.4
tetrahydrofuran	35.0

<u>West Well (COC# SW12002)</u>	<u>Concentration (ug.l)</u>
bis-(2-ethylhexyl)phthalate	5.0 (see Attachment 3.46)

On January 15, 1988, the District Clerk of the Taylor County Courthouse advised the Attorney General's Office of the dismissal of the MRE case from their docket for lack of prosecution. (see Attachment 3.39)

On February 3, 1988, the Attorney General's Office filed a Motion for Removal from the Dismissal Docket with the District Clerk of Taylor County due to the temporary injunction in place against MRE. (see Attachment 3.40)

On February 8, 1988, the TWC performed an annual solid waste compliance inspection at the MRE facility and found that all hazardous waste signs had deteriorated and/or blown down, the fence had been cut allowing easy access to the property, the record book was missing, the liner of the surface impoundment had several splits along the seams, the leachate collection system contained several feet of water, the cover to the silo was missing and the silo living quarters had been vandalized, and two drums of hazardous waste were found at the site. (see Attachment 3.41)

On April 29, 1988, the TWC informed MRE of their requirements to file Part B of their Hazardous Waste Permit application in accordance with Title 31, TAC section 305.42. (see Attachment 3.42)

On December 20, 1988, the TWC reported the results of their November 28, 1988 annual compliance evaluation inspection at the MRE facility. It was noted that the terms of the Agreed Temporary Order were never accomplished and that the facility was

abandoned in late 1987. Three solid waste management units were identified: the missile silo, the surface impoundment and the closed landfill. The facility had been evaporating the wastes from the silo in the surface impoundment until November 1987, when the electricity was cut off. It was also noted that the facility did not have interim status nor a current permit for hazardous waste activities. No interim status requirements had been met or maintained. The facility was totally abandoned and was in noncompliance with all state and federal regulations. A liquid sample and a sludge sample were taken from the northwest corner of the surface impoundment. A list of company's names was compiled off of sample containers stored on site. Other observations noted that the cover to the silo had deteriorated and the door to the living quarters was no longer locked, allowing entrance to the silo. The wastewater in the surface impoundment was beginning to evaporate leaving an orange-yellow crystallized sludge. (see Attachment 3.6)

On March 27, 1989, the TWC reported the results of the sample analysis taken during the November 28, 1988 annual compliance evaluation inspection at the MRE facility. (see Attachment 3.43)

On June 6, 1989, ICF Technology, Inc., provided the EPA Region VI office a copy of the Preliminary Assessment Report for MRE. (see Attachment 3.8)

On April 17, 1990, the Enforcement Section, Hazardous and Solid Waste Division of the TWC referred the MRE site to the Superfund and Emergency Response section for Federal or State Superfund action. (see Attachment 3.9)

On August 23, 1990, the EPA Region VI office provided the TWC with a copy of their Superfund site Strategy Recommendation (SSSR) which included a Screening site Inspection for the MRE facility which recommended that no further action be taken by the EPA and that action may be appropriate through the state. (see Attachment 3.2)

On January 23, 1991, the TWC reported on the results of their January 15, 1991 compliance evaluation inspection (CEI) for the MRE facility. (see Attachment 3.10)

On July 14, 1992, the TWC reported on the results of their July 9, 1992 CEI for the MRE facility recommending that the Industrial and Hazardous Waste Division refer the site to the Superfund section for ranking purposes. (see Attachment 3.44)

On September 2, 1992, the Industrial and Hazardous Waste Division, through the Enforcement Screening Committee, referred the MRE site to the Pollution Cleanup Division, Emergency Response and Assessment section for ranking purposes. (see Attachment 3.45)

An immediate removal was determined to be unnecessary because the site is located in a remote and unpopulated area, there are no actively leaking drums present, and it is



secured by a fence with a posted warning sign. Therefore, the site does not pose an imminent and substantial threat to human health or the environment.