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Community Relations Plan

for

McNabb Flying Service

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March 2000

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**COMMUNITY RELATIONS PLAN
for the
MCNABB FLYING SERVICE
STATE SUPERFUND SITE
ALVIN, TEXAS**

March 2000

**Texas Natural Resource Conservation Commission
Remediation Division
Office of Permitting Remediation and Registration
12100 Park 35 Circle
Building D
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COMMUNITY RELATIONS PLAN

for

McNabb Flying Service
State Superfund Site
Alvin, Texas

March 2000

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State Superfund Site should be directed to:

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**COMMUNITY RELATIONS PLAN
for
MCNABB FLYING SERVICE STATE SUPERFUND SITE
BRAZORIA COUNTY, TEXAS**

March 2000

OVERVIEW OF COMMUNITY RELATIONS PLAN

This Community Relations Plan (CRP) attempts to identify issues of community concern regarding the McNabb Flying Service State Superfund Site. It also outlines the anticipated community relations activities to be conducted during each phase of the cleanup at the McNabb Flying Service site.

The McNabb Flying Service CRP has been prepared to aid the Texas Natural Resource Conservation Commission (TNRCC) in developing a community relations program tailored to the needs of the community affected by the site. The TNRCC will conduct community relations activities to ensure that the local public has input regarding decisions and access to information about Superfund activities at the McNabb Flying Service site.

The information in this plan is based primarily on the Hazard Ranking System (HRS) package. This plan will be updated periodically during the course of the cleanup.

SITE PROFILE

Site Location and Description: The McNabb Flying Service (MFS) site is a residential and primarily undeveloped piece of property located approximately 1.5 miles northwest of the City of Alvin, 1 mile northeast of State Highway 6 at the intersection of Brazoria County Roads 146 and 539. The site is located at 29° 27' 8" North Latitude and 95° 17' 30" West Longitude. A Site Location Map is provided as Appendix A.

BACKGROUND AND OPERATING HISTORY

Little is known about the historical operations and waste management practices at the MFS site. Activity at the site began when Esther McNabb's husband, Joel McNabb, opened a flying school. The exact date the flying school opened is unknown. No pesticides were applied or stored at the site during this time. Esther and Joel's stepson, Frank McNabb, was the first to use the site as a base for an aerial pesticide applicator, although the exact dates of his activities are unknown. Frank's son, Toby McNabb, used the site for approximately one year after Frank left the business. Fertilizer application was the primary function at that time. The exact dates of Toby's activities at the site are unknown. MFS had been inactive for at least ten years when the U.S. Environmental Protection Agency (EPA) and the Texas Water Commission (TWC), predecessor agency to the TNRCC, began their site investigations.

The MFS site was identified as a potential hazardous waste site by the EPA on 10/20/84 from Texas Department of Agriculture files. A Preliminary Assessment was conducted at the MFS site on January 10, 1985. At that time the site was inactive and containers were observed in the hangars. The following information was obtained during an interview with Mr. Justin K. Davis, former chief pilot for McNabb Flying Service: No mixing of pesticides was done at the MFS site and all empty pesticide containers were returned to the farmer; all rinsate from pesticide containers were added to the aircraft; all application equipment was rinsed out with the last load; pump and spray booms were triple rinsed and the rinsate applied to the same field; no disposal of empty pesticide containers took place at the MFS site.

In a 1987 Tentative Disposition, the EPA recommended further investigation at the MFS site due to the

types of chemicals present and the lack of information about site operations. A Site Inspection was performed at the MFS site in 1987. A soil sample collected in the drainage pathway from the operations area showed low levels of methyl parathion and ethyl parathion (0.013 and 0.065 mg/Kg, respectively) and toxaphene at 325 mg/Kg. A sample collected from the McNabb ground water well, used for drinking water, showed no contamination by pesticides. The EPA issued a Superfund Site Strategy Recommendation in 1988 that no further remedial action was planned, however the site should be evaluated for a removal action. The MFS site was referred to the TWC on September 27, 1988.

On October 8, 1993, TNRCC Region 12 personnel conducted a Superfund Site Discovery Inspection at the MFS site. In hangar #1 there was one 55-gallon drum of methanol, one 55-gallon drum of toluene, one 55-gallon drum of acetone and four 55-gallon drums of methylene chloride. In hangar #2 there was one partially full 55-gallon drum of the herbicide Stam-M4, two partially full 55-gallon drums of unknown liquids, one 4-gallon metal container of toxaphene, one 4-gallon metal container of methyl parathion, four 2.5-gallon metal containers of Windfall Adjuvent and triphenyltin hydroxide as well as many empty, badly corroded pesticide and herbicide containers. A drum adjacent to water well #3 had one 55-gallon drum of Stam-M4 and two 55-gallon drums (one plastic, one metal) with unknown contents. The metal drum was documented to be leaking. A soil sample collected in hangar #1 showed a toxaphene concentration of 77.2 mg/Kg. A soil sample collected outside hangar #2 showed a toxaphene concentration of 63.5 mg/Kg. Based on these results, a Notice of Violation (NOV) was sent to Mrs. McNabb on 1/11/94. A response to the NOV was received on 2/16/94, describing Ms. McNabb's inability to address the violations.

The MFS site was referred to the Pollution Cleanup Division on April 7, 1994, for appropriate action. A State Superfund Candidate Site Eligibility/Status Sheet was completed on August 15, 1994 in which the MFS site was determined to be an eligible inactive facility.

On April 30, 1997, TNRCC personnel conducted an onsite sampling investigation at the McNabb Flying Service to obtain soil and drinking water samples to support the requirements for scoring the site. Approximately 90 drums, cans, containers, and bottles or jugs were located throughout Hangar #2. Five soil samples were collected during the site investigation; analysis indicated the presence of toxaphene and cadmium. Approximately 1,500 square feet of soil are impacted as a result of this contamination.

On August 16, 1999, IT Corporation, a TNRCC contractor, mobilized to the site with the intention of categorization of the various wastes on site, consolidation of wastes identified and triple rinsing and crushing of empty waste containers.

Initially, wood debris was cleared from in front of the hanger to provide adequate space to rinse and crush containers. Visqueen was laid out over this area and rinsing tubs placed on top to catch the rinseates generated during the rinsing of empty containers. A backhoe was then used to clear a path through the wood debris contained inside the hanger to gain access to the containers at the back of the hangar. Empty drums containing less than two inches of product were identified. All containers found to be empty were taken outside the hanger, triple rinsed in the containment area and crushed. The rinseate was pumped out of the containment area and into a drum. A total of 32 - 55 gallon drums, 13 - 30 gallon drums, and 51 -

5 gallon and small containers were tripled rinsed, crushed and placed in the roll-off box.

The roll-off box was removed from the MFS site by USA Environmental Services on August 25, 1999. The TNRCC contractor was on-site to direct the collection activities and authorize the removal of the wastes from the site.

All containers that contained product were then numbered with a unique identifier and logged down according to container size and label information when available. Sample jars were then laid out and numbered according to the corresponding drum. The containers were sampled following appropriate procedures. Air monitoring was also performed during the sampling event by a technician.

Samples collected were then analyzed for solubility, pH, oxidizer, flash point, chlorination, reactive cyanide, reactive sulfide, and physical characteristics noted. Analysis was conducted in an adjacent hangar area. The data was then reviewed to organize the various containers into compatible waste streams.

Containers, associated with compatible waste streams, were then bulked together to minimize the volume of waste to be disposed. A total of six (6) waste streams were identified at the site. The table below lists the waste stream identification number, quantity, and description.

Waste Stream	Quantity of Waste	Description of Waste
MFS-1	1 drum -overpacked	Organic Solvent
MFS-2	1 - 85 gallon overpack of small containers	Water Based Pesticides
MFS-3	1 drum -overpacked	Solid/Sludge
MFS-4	1 - 85 gallon overpack of small containers	'Lime Like' White Powder
MFS-5	2 - 55 gallon drums	Rinseate
MFS-6	2 - 85 gallon overpacks	Loose pack of misc. paint cans and paint thinners

Samples were then taken of the six (6) waste streams, using dedicated sampling packs, and analyzed for total solids, corrosivity, flash point, rinseate sulfide, reactive cyanide, full T.C.L.P., and full Totals at Specialized Assays Inc. in Nashville, Tennessee in order to fully characterize the waste streams for waste profiling.

On January 19, 2000, the wastes generated from the site activities were transported off-site by USA Environmental Services. The TNRCC contractor was on-site to direct the collection activities and authorize the removal of the wastes from the site. In addition to the six waste streams, two charged gas cylinders and several lead-acid batteries were isolated and removed from the facility.

COMMUNITY PROFILE

Alvin, Texas is located in Brazoria County, Texas, and is considered part of the Houston metropolitan area. Brazoria County is on the Gulf Coast and is part of the coastal plain. The main industries of the area include petroleum and chemical industries, tourism, fishing, and agribusiness. The total population of the county is 217,318, according to the 1998-1999 *Texas Almanac*. The population of Alvin is 21,005. Alvin also is the home of a junior college, Rice & Crawford.

Brazoria County Ethnicity - 1990 statistics

White, 154,875

Black, 15,981

American Indian, 812

Asian 1,961

Hispanic, 33,797

Other, 18,078

COMMUNITY INVOLVEMENT AND CONCERNS

The site was proposed to the registry for state Superfund on November 12, 1999. Notice was published in the *Alvin Sun* on November 8, 1999 and in the *Texas Register* on November 12, 1999. No comments were received from the public regarding the listing. The comment period ended on December 13, 1999.

SPECIFIC OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

- A. Maintain open communications between the Texas Natural Resource Conservation Commission, Brazoria County, City of Alvin, State elected officials and concerned citizens.
- B. Continue to expand the mailing list to include additional agencies, organizations, and residents that are interested in the project.
- C. Provide a central information contact from whom interested parties can receive information on site activities, project status, and study results.
- D. Provide citizens, involved agencies, elected officials, and the media with accurate, timely information concerning the scope, progress, and findings of site-related activities by issuing press releases and conducting community meetings.
- E. Brief field teams on community relations issues before performing on-site investigations.
- F. 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.
- G. Monitor community concerns and information requirements as the project progresses by monitoring the community response to news releases and community meetings.
- H. Modify the community relations plan as changes in community attitudes and needs occur and maintain accuracy during different project phases.

COMMUNITY RELATIONS TECHNIQUES

- A. 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.
- B. Public Consultations - Conduct informal meetings (if needed) with residents. To provide an opportunity for affected residents to express any concerns and to make inquiries to insure effective two-way communication.
- C. Program Document Repositories - To maintain easily accessible repositories through which the public may review project outputs. The public will be periodically informed of the availability of project documents and the location of repositories via techniques A through D.
- D. State Superfund Status Reports - Progress of activities at the McNabb Flying Service site is regularly posted to the TNRCC Superfund web site at:
<http://www.tnrcc.state.tx.us/permitting/remed/superfund>
- E. Revise CRP - To reflect changes in site activities or local concerns. After the Proposed Remedial Action Document (PRAD) has been issued, the CRP will be revised to address implementation of the selected remedial action alternative.

AREA ELECTED OFFICIALS

United States

The Honorable Tom DeLay
U.S. Representative
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Stafford, Texas 77477-3809
281/240-3700

The Honorable Troy Lewis
Mayor of Alvin
216 West Sealy Street
Alvin, Texas 77511
281/388-4200

County

State

The Honorable J. E. "Buster" Brown
Texas Senate
12063 Southwest Freeway, Suite 621
Lake Jackson, Texas 77477
281/494-7799

The Honorable John Willy
Brazoria County Judge
111 Locust
Angleton, Texas 77515
409/864-1200

The Honorable Dennis H. Bonnen
Texas Representative
122 E. Myrtle Street
Angleton, Texas 77515
409/848-1770

The Honorable Jack Harris
Brazoria County Commissioner
Precinct 3
P. O. Box 548
Alvin, Texas 77512
281/331-3197

City

AREA NEWS MEDIA

Alvin Journal

P.O. Box 1830
Pearland, Texas 77588-1830
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FYI

3110 Mustang Road
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Alvin Sun/Advertiser

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KEY PROJECT PERSONNEL

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PROGRAM DOCUMENT REPOSITORIES

Texas Natural Resource Conservation Commission
Records Management Center

Physical Address:

12100 Park 35 Circle
Building D
Austin, TX 78753

Mailing Address:

P.O. Box 13087 MC-225
Austin, Texas 78711-3087
1-800-633-9363
1-512-239-2920 (8:00 a.m. - 5:00 p.m. Monday - Friday)

Alvin Library

105 South Gordon
Alvin, Texas 78205
1-281-388-4300

Monday - Wednesday - Friday 10:00 a.m. - 6:00 p.m.

Tuesday - Thursday 10:00 a.m. - 8:00 p.m.

Saturday 10:00 a.m. - 5:00 p.m.

Sunday Closed