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Community Relations Plan

for

American Zinc

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September 2000

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COMMUNITY RELATIONS PLAN
for
American Zinc Proposed State Superfund Site
North of Dumas, Moore County, Texas

Updated June 1999

Overview of Community Relations Plan

This community relations plan (CRP) identifies issues of community concern regarding the American Zinc Proposed State Superfund site (American Zinc), north of the town of Dumas in Moore County, Texas. It also outlines the anticipated community relations activities to be conducted during each phase of the cleanup at the American Zinc site.

The American Zinc community relations plan 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 American Zinc site. The TNRCC will conduct community relations activities to ensure that the local public has input to decisions and access to information about Superfund activities at the American Zinc 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

Latitude/Longitude: 35B 56' 39" N, 101B 55' 59" W

Site Location and Description:

The American Zinc Proposed State Superfund site is located approximately 3.5 miles north on U.S. Highway 287 and 5 miles east on F.M. 119 from the town of Dumas in Moore County in the Texas panhandle.

The American Zinc Proposed State Superfund site is an abandoned zinc smeltering plant that occupies in excess of 160 acres. The facility was in operation from the late 1930's until the late 1960's or early 1970's, generating heavy metal waste typical to the smelting

process. Numerous slag piles have been deposited in, around, and across the intermittent South Palo Creek.

Background and Operating History:

The American Zinc Company started operations as a zinc smelting plant in the late 1930's. The site was originally developed by Illinois Zinc Company and then sold to Peru Mining Company in September 1939. In March 1943, the Peru Mining Company of Illinois conveyed the site to the American Zinc Company. This conveyance was subject to a lease agreement dated July 31, 1942, between the Peru Mining Company and the Defense Plant Corporation, a corporation created by the Reconstruction Finance Corporation Act, as Amended, to aid the U.S. Government in its national defense program. The smelting plant was used for the major part of its lifetime serving the "war effort" during World War II. Italian prisoners of war were used as the labor force during the war.

In 1957 the smelting plant was declared surplus and assigned to the Administrator of General Services for disposal pursuant to the Federal Property and Administrative Service Act of 1949. The U.S. Government and Reconstruction Finance Corporation conveyed its leasehold interest for the site to the American Zinc, Lead and Smelting Company in a bill of sale dated November 5, 1958.

After the site was decommissioned American Zinc Company sold the site to W.R. Pendleton and Clark A. Pendleton through public auction on December 14, 1971.

On May 2, 1985, Extraction Systems of America purchased part of the site. All improvements, scrap material and residue located on that portion of the property were included in the Deed of Trust. On December 8, 1988, Extraction Systems of America and Extraction Systems, Ltd., conveyed property of the May 1985 sale back to W.R. Pendleton and wife, Mozelle Pendleton in lieu of foreclosure.

On at least one occasion, slag material from the American Zinc has been sold and used as road base material. Sometime between 1973 and 1974 the Texas Department of Highway and Public Transportation (TDHPT), predecessor agency to the Texas Department of Transportation (TxDOT), used purchased zinc smelter residue material from the site as road base within the Dumas city limits.

Over the years since the plant's closing, an unknown number of private individuals have also taken slag and other waste-type materials from the site to use as bed-lining for home driveways, flower beds and lawns.

The TWC became aware of the American Zinc site in the fall of 1987 when a Texas Water Commission (TWC), TNRCC predecesor agency, field inspector drove by the site while

traveling to an unrelated inspection.

On November 19, 1987 the TWC performed a sampling event at the site. During this sampling event the TWC collected a creek sediment sample, soil sample and solid waste composite sample from various locations around the site. The analysis results indicated significant contamination from lead and cadmium on site.

In August 1989, the TWC and TDHPT made four soil borings along the roadways, within the city of Dumas, that received slag material as roadbase. The results from those borings indicated contamination from lead and cadmium.

On September 6, 1989, TWC personnel collected four additional creek sediment samples from the South Palo Duro Creek. One sample was collected upstream of the waste piles for a representation of background. The three remaining samples were collected downstream on the adjacent properties to the north of the American Zinc site. The results of this sampling event revealed a sediment sample containing cadmium significantly exceeding background within one mile of the site. Sediment samples collected one mile downstream of the waste piles revealed greatly enhanced levels of cadmium and lead over sediment samples collected upstream of the waste piles. Sediment samples as far as three miles downstream showed high levels of cadmium and lead.

The Hazard Ranking System Assessment for the American Zinc site was completed in March 1993. On November 16, 1993 the Texas Natural Resource Conservation Commission (TNRCC), successor agency to the TWC, held a public meeting in Dumas to announce TNRCC intentions to propose the American Zinc site to the State Superfund Registry.

The Texas Natural Resource Conservation Commission (TNRCC) was notified by the residents of Dumas of the presence of slag/retort material in yards during a public meeting for the notification of registry listing for the American Zinc site. Six residential yards and one commercial property were originally identified for sampling by the TNRCC. Of these six yards, four were found to have levels of contaminants that the Texas Department of Health (TDH) indicated would be "prudent" to remove from the yards. The commercial property was addressed by the property owner. The TDH was requested to perform a health consultation, which resulted in the TDH recommendation that the slag/retort material in the four yards be removed.

The four residences recommended for remediation were located in Dumas on Bennett Street, 5th Street and Carson Street. A farm located in far north Moore County was also listed for slag/retort removal. The removals took place in October and November 1997.

The remedial action to be performed at each residence included:

- Documentation/Inventory of Existing Site Conditions
- Excavation and Staging of Soil/Retort Material
- Backfilling of Excavated Areas with Clean Imported Fill Material
- Restoration of Site to Previous Grade and Condition
- Sampling and Analysis of the Staged Soil/Retort Material
- Waste Characterization of Staged Soil/Retort Material
- Transportation and Disposal of Contaminated Soil/Retort Material

A state approved contractor was enlisted by the state to perform the slag/retort removal from the yards and farm.

Summary of the removal action at the farm located in far north Moore County

The contractor began the project by performing excavation activities at the farm. The area of concern at the farm was comprised of one large affected area consisting of 8,400 square feet. The proposed area of excavation was located between the farm equipment storage warehouse and residence. Excavation in this area was performed using a trackhoe. The excavated soil/retort material was removed in 6 inches lifts and inspected by the on-site TNRCC representative to estimate the depth of the contamination. A total of 375 cubic yards of slag/retort material was excavated and stockpiled on polyethylene sheeting for sampling and analysis. The affected area was excavated to a depth of 12

inches. The base of the excavation was inspected by the TNRCC representative and visually observed to be free of contaminants. Samples were collected from the base of the excavation and submitted for analytical analysis and the results indicated 18 parts per million (ppm) and 16 ppm Arsenic, 7 ppm and <5 ppm Cadmium, 9 ppm and 15 ppm Lead and 1,200 ppm and 3,000 ppm Zinc. Samples were also collected from the stockpiled sod and submitted for analytical analysis for waste characterization. After samples were collected from the stockpiled soil/retort material, the stockpiled soil/retort material was encapsulated in polyethylene sheeting and weighted to ensure that the plastic remained on the stockpile during staging.

Upon completion of the excavation activities and confirmation of cleanliness by the analytical results, the area was backfilled with sand and covered with 1.5 inch unwashed gravel. A total of 200 cubic yards of fill sand and 167 cubic yards of unwashed gravel were placed and compacted in the excavation. A sample was collected from the backfilled material and submitted to the laboratory for analytical analysis. The backfilled area was inspected and approved by the TNRCC and the property owner and no further remedial action was required at this location.

Summary of the removal action at the residence located in Dumas on 5th Street

Remedial action at this residence consisted of one affected area. The affected area consisted of a small stretch of property adjacent to the rear driveway and backyard fence comprised of a total of 1,175 square feet. Prior to excavation, the contractor prepared an inventory list of all personal belongings located in the affected area. All personnel belongings in the affected area requiring removal for excavation were removed from the affected area and replaced upon the completion of excavation and backfilling. Excavation activities were performed at this location using a backhoe. The excavated soil/retort material was removed in 6 inch lifts and inspected by the on site TNRCC representative to determine the depth of contamination. A total of 20 cubic yards of slag/retort material was removed from the contaminated area. The affected material was removed to a depth of 6 inches and inspected by the TNRCC representative. Upon inspection by the TNRCC representative, it was determined that the soil was visually free of contaminants. The excavated slag/retort material was placed in roll-off boxes and staged for sampling and waste characterization at the City of Dumas Landfill, as per agreement with the City of Dumas. Upon completion of the excavation activities, samples were collected from the base of the excavation and submitted for analytical analysis and the results indicated 16 ppm and 22 ppm Arsenic, <5 and 5 ppm Cadmium, <5 and <5 ppm Lead and 120 and 1,900 ppm Zinc.

Upon completion of excavation activities and confirmation of cleanliness from the analytical results, the excavated area was backfilled with 20 cubic yards of 1.5 inch unwashed gravel. The entire backfilled area was compacted and leveled using a backhoe. Upon completion

of the backfilling activities, the entire area was inspected by the on site TNRCC representative and property owner. It was agreed that no further remedial action was required at this location.

Summary of the removal action at the residence located in Dumas on Carson Street

This residence consisted of three affected areas. The affected areas consisted of the entire front and portions of both side yards comprising a total of 1,715 square feet. Prior to excavation, the contractor prepared an inventory list of all personal belongings located in the affected area. All personal belongings in the affected area requiring removal for excavation were removed from the affected area and replaced upon the completion of excavation and backfilling. Excavation activities at this location were performed using a backhoe, mini--excavator and hand labor. The excavation included the complete removal of the lava rock cover located over the proposed excavated area. The lava rock located over the excavated area was a combination of small and large pieces of slag/retort material and required disposal of the entire material to ensure all slag/retort material had been removed. The excavated slag/retort material was removed in 6 inch lifts and inspected by the on site TNRCC representative to determine the depth of contamination. A total of 30 cubic yards of slag/retort material was removed from the residence. The affected material was removed to a depth of 6 inches. Upon completion of the excavation, the excavated area was inspected by the TNRCC representative for the presence of contaminants. Upon the inspection, the base of the excavation was determined to be visually free of contaminants. The excavated slag/retort material was placed in roll-off boxes and staged for sampling and waste characterization at the City of Dumas Landfill, as per agreement with the City of Dumas. Samples were collected from the base of the excavation and submitted to the laboratory for analytical analysis and the results indicated 12 ppm and 15 ppm Arsenic, <5 ppm and <5 ppm Cadmium, <5 ppm and <5 ppm Lead and 330 ppm and 34 ppm Zinc.

Upon completion of the excavation and confirmation of cleanliness by the analytical results, the excavated area was backfilled with 22 cubic yards of sand to 3 inches below grade. The contractor placed polyethylene sheeting over the backfilled sand and covered the remaining area with 16 cubic yards of black lava rock. The lava rock was placed in a manner to ensure the area was returned to its original state prior to excavation. Two affected areas were backfilled with sand and lava rock. The north affected area near the driveway was backfilled with 4 cubic yards of top soil. Upon completion of the backfilling, the area was inspected by the on site TNRCC representative and property owner. It was agreed that no further remedial action was required at this location.

Summary of the removal action at the residence located in Dumas on Bennett Street

The remedial action performed at this residence consisted of two affected areas. The garden area, comprised of 851 square feet of affected material, and the area behind the backyard fence, comprised of 2,610 square feet of affected material.

The excavation of soil/retort material at the Bennet Street residence was initiated by the removal of all personal belongings and vegetation in the garden area. The garden area was populated with a variety of vegetation and plants including various objects of personal belonging (firewood, bikes, etc.). Prior to excavation, the contractor prepared an inventory list of all personal belongings located m the affected area. All personal belongings in the affected area requiring removal for excavation were removed from the affected area and replaced upon the completion of excavation and backfilling. All belongings were removed manually by contractor employees and staged in the driveway area. Excavation in this area was performed using hand labor and shovels. The slag/retort material was excavated in 6 inch lifts to be inspected by the on site TNRCC representative to determine the depth of contamination. The affected material was excavated to a depth of 5 inches. Upon completion of the excavation, the base of the excavation was inspected by the TNRCC representative and visually determined to be free of contaminants. All excavated soil was manually removed with wheelbarrows and placed in roll-off boxes provided by the contractor for sampling and waste characterization at the City of Dumas Landfill, as per agreement with the City of Dumas. A total of 18 cubic yards of slag/retort material was removed from the garden area. Upon completion of the excavation activities, samples were collected from the base of the excavation and submitted to a laboratory for analytical analysis and the results indicated 8 ppm and 33 ppm Arsenic, <5 ppm and <5 ppm Cadmium, <5 and 22 ppm Lead and 46 ppm and 1,300 ppm Zinc.

Upon completion of the excavation activities and confirmation of cleanliness from the analytical results, the garden area was backfilled with 19 cubic yards of 1.5 inch unwashed gravel and compacted import clean fill material. All vegetation and personal belongings removed from the excavated area were replaced in the same location prior to remedial activities. Upon completion of the excavation activities, the garden area was inspected by the on site TNRCC representative and property owner. It was agreed that no further remedial action would be performed in this area.

The Bennett Street residence also consisted of the excavation of contaminated soil/retort material behind the backyard fence. The contaminated soil/retort material in this area was removed using a backhoe and hand labor. The excavated soil/retort material was removed in 6 inch lifts and inspected by the on site TNRCC representative to determine the depth of contamination. Upon completion of the excavation, the base of the excavation was inspected by the TNRCC representative and visually determined to be free of contaminants. The affected material was excavated to a depth of 3 inches. A total of 20 cubic yards of slag/retort material was removed from the excavation. All excavated slag/retort material was placed in roll-off boxes provided by the contractor and staged at the City of Dumas Landfill, as per agreement with the City of Dumas, for sampling and

waste characterization. Samples were collected from the base of the excavation and submitted for analytical analysis and the results indicated 23 ppm Arsenic, <5 ppm Cadmium, <5 ppm Lead and 290 ppm Zinc.

Upon completion of the excavation, the excavated area was backfilled with 20 cubic yards of 1.5 inch unwashed gravel. The backfilled area was inspected by the on site TNRCC representative property owner. It was agreed that no further remedial action was required at this location.

Community Profile

The American Zinc Proposed State Superfund site is located approximately six miles northeast of the town of Dumas in Moore County, Texas. Dumas is located 50 miles north of Amarillo, in the Upper Plains of the Texas Panhandle. The 1994-95 Texas Almanac list the population of Dumas at 13,065 and all of Moore County at 18,567.
According to the 1990 U.S. Census Statistics Moore County ethnicity is: white, 71.6%; black, 0.5%, Native American 0.7%, Asian, 1.6%; Hispanic, 31.9%; and other ethnicities at 25.6%.

Extensive cattle production, feedlot operations, varied agriculture activities and the production of oil and natural gas are the main commercial interests of Moore County.

Community Involvement and Concerns

The TNRCC held a public meeting, on November 16, 1993, at Dumas City Hall, regarding the proposed listing of the American Zinc facility on the State Superfund Registry. Between forty and fifty citizens attended the November 1993 public meeting on the proposed listing.

Citizens, at that meeting, expressed concern regarding possible leaching of contaminants into the Ogallala Aquifer.

On May 26, 1994, the TNRCC held an informal information-gathering session at Dumas City Hall to conduct a survey of area residents who may have removed materials or slag, or have knowledge of such removal from the American Zinc site. Less than ten residents attended the session.

In June 1994 the TNRCC and Texas Department of Health (TDH) ran ads in the *Moore County Press* advising residents of the agency's plan to be in the Dumas area the week of July 11, 1994, to conduct additional sampling of private property that may had slag or other materials placed on it from the American Zinc site.

During the August 1997, TNRCC staff met with the owners of the four properties, that were deemed by the Texas Department of Health, to be in need of slag/retort removal. All owner signed an agreement with the TNRCC to allow the material to be removed from their properties.

The removals took place in October and November 1997.

Specific Objectives of the Community Relations Program

A. Maintain open communications between the Texas Natural Resource Conservation Commission, Moore County and State 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 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 by monitoring the community response to news releases and community meetings.

F. 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 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 insure effective two-way communication.

D. 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 C.

E. TNRCC State Superfund Internet Homepage - provide current, timely information on state Superfund activities on the World Wide Web at the following web address: www.tnrcc.state.tx.us/waste/superfund.

F. 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

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