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## **HRS DOCUMENTATION RECORD**

**for**

**Stoller Chemical Company, Inc.  
Plainview, Hale County, Texas  
TXD 156 273 682**

**Prepared by:**

**Texas Natural Resource  
Conservation Commission  
Austin, Texas**

**May 2000**

**No graphic illustrations or copies of documents cited as references in the determination of the HRS score, are included with this electronic version, but are available with the printed versions as part of the Stoller Chemical Company repository records**

**at**

**Unger Memorial Library  
825 Austin Street  
Plainview, Texas**

**and/or**

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Austin, Texas**

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# **HAZARD RANKING SYSTEM DOCUMENTATION RECORD**

Stoller Chemical Company, Inc.  
Plainview, Hale County, Texas  
EPA ID# TXD 156 273 682  
TNRCC ID# 80958

Prepared by

Texas Natural Resource Conservation Commission  
Site Assessment and Management Section  
Site Discovery and Assessment Program Staff  
Austin, Texas

May 2000

**HRS DOCUMENTATION RECORD**

**Stoller Chemical Company, Inc.**

**Plainview, Hale County, Texas**

**TXD# 156 273 682**

**SIGNATURE PAGE**

\_\_\_\_\_  
Marshall A. Cedilote

Texas Natural Resource Conservation Commission  
Superfund Site Discovery and Assessment Team  
Project Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Stephanie Pogue

Texas Natural Resource Conservation Commission  
Superfund Site Discovery and Assessment Team  
QA/QC Officer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Wesley G. Newberry

Texas Natural Resource Conservation Commission  
Superfund Site Discovery and Assessment Team  
Team Leader

\_\_\_\_\_  
Date

\_\_\_\_\_  
Glenda Champagne

Texas Natural Resource Conservation Commission  
Site Assessment and Management  
Section Manager

\_\_\_\_\_  
Date

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**ATTACHMENT 1**

**HRS DOCUMENTATION RECORD - REVIEW COVER SHEET**

**NAME OF SITE:** Stoller Chemical Company, Inc.

**AKA:** None

**CONTACT:** Marshall A. Cedilote, TNRCC (512) 239-2514

**CURRENT SITE OWNER/OPERATOR:** Pamela Johnson, Trustee  
Baker & Hostetler  
1000 Louisiana Street, Suite 2000  
Houston, TX 77002

**PATHWAYS OF CONCERN:**

Ground Water Pathway

Releases of hazardous substances to the soil and potential releases to ground water are of major concern for this site. Hazardous substances, attributable to Stoller Chemical Company have been documented in the onsite soils and pose a potential threat to public drinking water wells with 4 miles of the site. However, data is inadequate at this time to establish a release to the Ogallala aquifer system.

**PATHWAY, COMPONENTS OR THREATS NOT EVALUATED:**

**Soil Exposure Pathway**

The Soil Exposure Pathway was not scored because of a lack of residential targets in the vicinity of the site.

**Surface Water Pathway**

The Surface Water Overland/Flood Migration Component, and Ground Water to Surface Water Migration Component were not scored because of a lack of surface water in the vicinity of the site.

**Air Migration Pathway**

The Air Migration Pathway was not scored because there is no observed release for the Air Migration Pathway.

*(Although these pathways have not been evaluated, the TNRCC is concerned for all pathways surrounding the site. However, evaluation of these pathways and threats would not have significantly increased the overall site score.)*

## NOTES TO READER

The following rules were used when citing references in the HRS Documentation Record:

1. All references attached to this report have been stamped with a designated page number. However, if the reference page had an original number, that number is cited.
2. The State predecessor agencies: Texas Water Quality Board (TWQB), Texas Department of Water Resources (TDWR), Texas Water Commission (TWC), and Texas Air Control Board (TACB), referred to throughout this report are now 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.

## HRS DOCUMENTATION RECORD

**Name of Site:** Stoller Chemical Company, Inc.      **Date Prepared:** 5/2000

**CERCLIS ID Number:** TXD 156 273 682

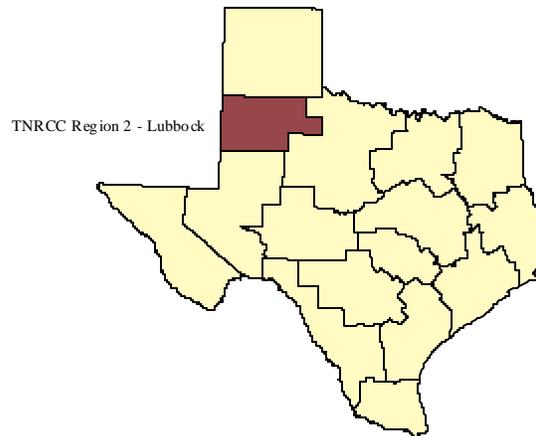
**TNRCC ID#:** 80958      **TNRCC Region:** 2

**Street Address of Site:** 5200 North Columbia, Plainview, Texas  
See Figure 1 - Site Location Map (Ref. 3)

**City, County, State:** Plainview, Hale County, Texas

**Topographic Map:** US Geological Survey 7.5 Minute Topographic Quadrangle, Plainview, Texas,  
1965 (Ref. 3)

**Latitude:** 34E 13' 45" North      **Longitude:** 101E 42' 35" West  
(Ref. 4, p. 002)



### **Pathway Scores:**

Groundwater Migration Pathway	12.2
Surface Water Migration Pathway	NS
Soil Exposure Pathway	NS
Air Migration Pathway	NS

NS - Not Scored

**HRS SITE SCORE: 6.1**

## **GENERAL DESCRIPTION OF THE SITE:**

The Stoller Chemical Company, Inc. (Stoller) site occupies 4.99 acres at 5200 North Columbia, north of Plainview, Texas (Ref. 4, p. 002). See Figure 1 for location of the EPPW site (Ref. 3, p. 003). The geographic coordinates of the site are Latitude 34E 13' 45" N and Longitude 101E 42' 35" W (Ref. 4, p. 002). Stoller Chemical Company, Inc. is currently a debtor in a pending Chapter 7 bankruptcy proceeding before the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Attorney Pamela Gale Johnson has been appointed by the U. S. Bankruptcy Court to serve in the capacity of Trustee, for the purpose of liquidating Stoller's estate (Ref. 5, p. 001).

## **SITE SUMMARY AND OPERATING HISTORY**

It is unknown when Stoller began operations at the 5200 North Columbia location. At the time of the first inspection by Texas Water Commission (TWC) District 2 personnel in April, 1993 Stoller had already filed for Chapter 7 bankruptcy protection (Ref. 5, p. 001; Ref. 6, p. 018). During the inspection, an 8-part composite soil sample was collected along the south side of the metal warehouse and submitted for pesticide and metals analysis (Ref. 6, p. 018). Sampling results indicated contamination by 4,4'-DDE and heavy metals (Ref. 6, pp. 011, 013, 018). The TWC inspector cited Stoller for a violation of rules relating to proper notification of industrial and hazardous waste activities (Ref. 6, pp. 020, 023). The TWC inspector was contacted on May 20, 1993 by Mr. Earl James, Stoller Enterprises, who stated that the facility mixed micronutrients for agricultural production and was in the process of placing the property up for sale (Ref. 6, p. 019).

On December 20, 1993 the Texas Natural Resource Conservation Commission (TNRCC) discovered that Regional Waste Company (RWC) was operating an illegal container storage area at the Stoller site. The container storage area consisted of a bob-tail cattle trailer holding twenty five (25) drums of hazardous waste, as well as numerous crushed drums, behind the Stoller warehouse. The TWC inspector documented that some of the drums were rusting out and in advanced stages of deterioration. The TWC inspector directed Mr. Ted Herring, owner of RWC, to overpack the deteriorating drums and properly dispose of the waste (Ref. 7, p. 019). This trailer of 25 drums came to be located on the Stoller site in the following manner: The trailer was found parked behind an inactive cotton gin at the intersection of FM 788 and I-20 on February 25, 1988. Three (3) of the of the twenty (20) drums of waste found on it had hazardous waste labels identifying the start date of accumulation as March 8, 1984. Analytical results, as well as records seized from Mr. Herring, indicated that these drums contained hazardous waste (Ref. 7, p. 019; Ref. 8). Mr. Herring was then instructed to overpack the leaking drums and arrange for proper disposal of the waste. He claimed financial inability to do so and on March 6, 1988 transported the trailer to his warehouse, located at 6<sup>th</sup> and Fir, Plainview, Texas, where he repacked the twenty (20) drums into twenty two (22) 55-gallon drums. Three more drums of hazardous waste were received by Mr. Herring (date unknown) and the load of twenty five (25) drums were transported to the Stoller site sometime prior to March 11, 1991 (the date when Mr. Herring lost the lease at his warehouse at 6<sup>th</sup> and Fir) (Ref. 7, p. 020).

On May 16, 1994 the TNRCC referred RWC to the U.S. EPA for enforcement action for illegal tank cleaning

activity at the Stoller site (Ref. 9, p. 001).

On January 4, 1994 a black substance was discovered on the ground in front of the Stoller warehouse which Mr. Herring stated was fertilizer. No documentation could be provided by Mr. Herring to prove this statement (Ref. 7, p. 020). Mr. Herring was contacted by telephone on January 5, 1994 at which time he again stated that the material on the ground at the Stoller warehouse was fertilizer but could provide no documentation to prove this. (Ref. 7, p. 020). He also stated that he had been contracted by Mr. Earl James of DBJ Enterprises to empty the tanks at the Stoller site and transport them to the Texas Rio Grande valley (receiving facility unknown) Mr. Herring was directed by a TNRCC inspector to remediate the spill and collect verification samples from the area (Ref. 7, p. 020). Mr. Earl James was contacted by telephone on January 5, 1994 and verified that he had contracted Mr. Herring to clean the tanks for transportation to the Texas valley but that dumping the contents of the tanks onto the ground was not part of the contract (Ref. 7, p. 020). On January 9, 1994 a TNRCC inspector documented that some work had been done to clean up the spill (Ref. 7, p. 020).

On June 7, 1994 the TNRCC Region 2 office referred RWC for enforcement based on analysis of samples collected from the spill area of the unauthorized tank washing. Sample results indicated the following hazardous substances to be present at the Stoller site: Arsenic, zinc, copper, nickel, chromium, copper, iron, chloromethane and acetone (Ref. 10, pp. 007-009). On July 28, 1994 the Stoller site was referred to the state superfund program (Ref. 11, pp. 001-006).

On April 21, 1995 Mr. Herring was notified by letter that RWC was under enforcement for violations of solid waste regulations and was invited to Austin for a meeting to discuss the facts of the case (Ref. 12, pp. 001-004). On June 30, 1995 Mr. Herring was notified by letter that the TNRCC was assessing civil penalties and requiring that he take remedial action at the Stoller site (Ref. 13, pp. 001-015).

On September 11, 1995 the TNRCC Region 2 office requested a state funded removal of the drums of hazardous waste stored at the Stoller site (Ref. 14, pp. 001-002), however a removal was not conducted at this time. Sample results from the drums indicated that they held methyl parathion, ethyl parathion, lead, Disyston, Sevin and arsenic (Ref. 14, pp. 006-008, 011-012, 014-017). Sample results from soil under the leaking drums indicated contamination by arsenic and lead (Ref. 14, pp. 018-020) and methyl parathion, permethrin, 1,3,5-trimethyl benzene, 1,3-diethyl benzene, 4-ethyl-1,2-dimethyl benzene, 2-ethyl naphthalene (tentatively identified compounds) (Ref. 14, p. 022). On September 27, 1996 the TNRCC Industrial and Hazardous Waste Enforcement Screening Committee met and determined that enforcement was no longer an appropriate route of remedy and referred RWC to the Pollution Cleanup Division (Ref. 15, pp. 001-015).

On October 5, 1995 Mr. Earl James, Stoller Enterprises, was notified by letter that the TNRCC would perform a Preliminary Assessment (PA) at the Stoller site (Ref. 16, pp. 001-002). On October 24, 1995 TNRCC personnel performed a PA at the Stoller site and identified wastes both inside and outside the warehouse (Ref. 4, p. 007). Inside the warehouse were eleven (11) 55-gallon drums and various 5-gallon buckets of unknown materials, four (4) pallets of liquid sodium sulfate fertilizer, six (6) pallets of pelham phosphate, six (6) pallets of liquid sulfur, fertilizer and kickoff seed treatment (Ref. 4, p. 007). Outside the warehouse in a fenced area (unlocked) were seven (7) 5,500-6,000 gallon storage tank tanks (contents unknown) and approximately fifteen (15) 55-gallon product/waste drums and numerous 5-gallon buckets. All drums and buckets appeared to be in poor condition (Ref. 4, p. 007). Another drum storage area east of the fenced area contained approximately fifty

four (54) product/waste drums and numerous 5-gallon buckets. All drums and buckets in this area appeared to be in poor condition and leakage was documented throughout the area (Ref. 4, p. 007). A cattle trailer containing twenty five (25) drums of hazardous and unknown wastes with a drip pan placed underneath for secondary containment was documented on the east side of the site (Ref. 4, p. 007). (PRP information related to these drums was collected during the PA) Additional observations made during the PA were the presence of an abandoned well approximately 62 feet northwest of the warehouse (a bucket of lubrication oil sat immediately adjacent to it), an abandoned well or septic tank opening approximately 150 feet northeast of the warehouse and three (3) more drum storage areas containing empty agricultural product drums on the east and southeast sides of the site (Ref. 4, p. 007).

On November 13, 1995 the TNRCC notified Mr. Herring by letter that: Previously submitted financial disclosure forms were incomplete and would have to be resubmitted to reflect his spouse/community property status; RWC was required by law to notify the TNRCC of drum recycling activities; and the TNRCC would be canceling RWC's hazardous waste registration to prevent future instances of hazardous waste acceptance (Ref. 17, pp. 001-002).

On May 30, 1996 Environmental & Safety Services, Inc. responded to the TNRCC's letter, dated May 16, 1996 (letter could not be located in file), regarding the responsibility of the Edmonson Coop Gin for waste found at the Stoller site (Ref. 18, pp. 001-004). The response stated that the Edmonson Coop Gin was no longer in business since it had merged with United Farm Industries, Inc. in 1993 and that their liability was only for the three drums that had been taken by RWC (Ref. 18, p. 001). Receipts included with the response showed that Edmonson Coop Gin paid RWC \$2,899.66 to take 3 drums of waste from their site in Edmonson, Texas in 1984 (Ref. 18, pp. 002-004).

On November 14, 1996 the TNRCC notified all PRPs by letter that the Stoller site was under state superfund evaluation and requested information regarding their relationships to the site as well as material or waste shipped there. PRPs included: Stoller Enterprises (Ref. 19, p. 001); Mr. Ted Herring, RWC (Ref. 20, p. 001); FMC Corporation (Ref. 21, p. 001); United Farm Industries (Ref. 22, p. 001); Ms. Pamela G. Johnson, U.S. Bankruptcy Trustee [NOTE: As a trustee, Ms. Johnson is considered a property owner] (Ref. 23, p. 001); and Terra International, Inc. (Ref. 24, p. 001) [NOTE: Terra International, Inc. and FMC Corporation were identified as PRPs by the presence of drums with their labels on them at the Stoller site]. Environmental & Safety Services Inc. responded on behalf of United Farm Industries on December 2, 1996 and claimed that no one at TNRCC could show specific evidence where the waste was onsite nor that it belonged to United Farm Industries (Ref. 25, pp. 001-002). Dames & Moore responded on behalf of Stoller Enterprises on December 10, 1996 that they intended to take the Stoller site into the Voluntary Cleanup Program (Ref. 26, p. 001). McDermott, Will & Emery responded on behalf of Terra International on December 17, 1996 and stated that Terra International believed they had no liability for any material at the Stoller site and they were not interested in performing any waste removal (Ref. 27, p. 001-003). FMC Corporation responded on December 30, 1996 and objected to the TNRCC's request for information because it considered the request overly broad and called for the disclosure of privileged and confidential information (Ref. 28, p. 001-002). No file information could be located regarding any response from Ms. Pamela G. Johnson, Trustee or Mr. Ted Herring, RWC.

On April 17, 1997 Stoller Enterprises submitted an application to the TNRCC Voluntary Cleanup Program (VCP) for the Stoller site (Ref. 29, pp. 001-006). This application included a Phase I Site Assessment prepared by Dames & Moore (Ref. 30, pp. 001-076). On May 23, 1997 the TNRCC acknowledged receipt of the VCP application by Stoller Enterprises and requested a signed agreement and schedule of submittals (Ref. 31, p. 001). On August 30, 1997 the TNRCC notified Stoller Enterprises that more than 30 days had passed since their acceptance into VCP and that an agreement must be received within 20 days or the TNRCC may elect to withdraw from VCP negotiations (Ref. 32, p. 001).

On September 18, 1997 the TNRCC conducted a follow-up inspection at the Stoller site to determine if RWC was continuing to store hazardous waste in an unauthorized manner. The TNRCC inspector documented that releases of hazardous substances continued from the trailer storing drums of hazardous waste and requested a state funded removal of the drums (Ref. 33, p. 001).

On October 30, 1997 the TNRCC VCP Program notified Mr. Earl James that unless a signed agreement was reached between Stoller Enterprises and the TNRCC within 20 days, the TNRCC would withdraw from VCP negotiations (Ref. 34, p. 001). On December 11, 1997 the TNRCC notified Mr. Earl James that the TNRCC was formally withdrawing from VCP negotiations regarding the Stoller site (Ref. 35, p. 001).

On January 6, 1998 the TNRCC began a state funded removal action of the twenty five (25) drums contained in the cattle trailer at the Stoller site. The removal action was completed on January 9, 1998 (Ref. 36, pp. 001-002).

On September 8, 1998 the TNRCC conducted a Case Development Inspection at the Stoller site and documented that numerous containers were missing from the site, tank valves were leaking, 55-gallon drums were without covers and stained soil was documented from around missing containers (Ref. 37, p. 010).

## REFERENCES

- | <u>Reference Number</u> | <u>Description of the Reference</u>  |
|-------------------------|--|
| 1.                      | U.S. Environmental Protection Agency (USEPA), 40CFR Part 300, <i>Hazard Ranking System</i> . 55 Federal Register 51583, December, 1990. Excerpt pages - 1.   |
| 2.                      | USEPA, <i>Superfund Chemical Data Matrix (SCDM)</i> . June, 1996. Excerpt pages -2.  |
| 3.                      | U. S. Geological Survey. Plainview, Texas 7.5 Minute Topographic Quadrangle. 1965. 1 page.   |
| 4.                      | Texas Natural Resource Conservation Commission (TNRCC), <i>Preliminary Assessment Report (Abbreviated Report) for Stoller Chemical Company, Inc.</i> April 1996. Excerpt pages - 14.   |
| 5.                      | PACER, Southern District of Texas, <i>Bankruptcy Case 92-42519, In re: Stoller Chemical Company, Inc.</i> September 12, 1998. 1 page.  |
| 6.                      | Jeff Bertl, Texas Water Commission (TWC) District 2, <i>Stoller Chemical Company, Inc., Compliance Evaluation Inspection</i> . May 20, 1993. 28 pages.   |
| 7.                      | Jeff Bertl, TWC District 2, <i>Regional Waste Company, Compliance Evaluation Inspection</i> . January 18, 1994. 21 pages.  |
| 8.                      | Records seized from Regional Waste Company. Date unknown. 159 pages.   |
| 9.                      | Wendy Rozacky, Manager, Enforcement Section, Industrial and Hazardous Waste Division, Texas Natural Resource Conservation Commission (TNRCC), To: Mr. Walter Biggins, Chief, Grants and Authorization Section, U.S. EPA, <i>Re: Regional Waste Company, Inc. EPA ID No. TXD096055967, TNRCC Registration No. 62006, Referral of Continuing Violations</i> . May 16, 1994. 2 pages. |
| 10.                     | Jeff Bertl, TNRCC Region 2, <i>Stoller Chemical Company, Inc., Sampling Inspection</i> . June 7, 1994. 12 pages.   |
| 11.                     | TNRCC Interoffice Memorandum, From: Cathy Remmert, Enforcement Coordinator, Enforcement Section, Industrial & Hazardous Waste Division, To: Stennie Meadours, Manager, Emergency Response Section, Pollution Cleanup Division, <i>Stoller Chemical Company, Inc. Additional Information for On-going State Superfund Action</i> . July 28, 1994. 6 pages.                          |
| 12.                     | Cathy Remmert, Supervisor, Enforcement Team I, Enforcement Section, Industrial & Hazardous   |

- Waste Division, To: Mr. Ted Herring, Regional Waste Company, *Re: Regional Waste Company, 5200 N. Columbia, Plainview, solid Waste Registration No. 62006, EPA Identification No. TXD096055967, Notice of Solid Waste Violations.* April 21, 1995. 4 pages.
13. Kevin McCalla, Deputy Director, Office of Legal, To: R. Ted Herring, Regional Waste Company, *Re: Notice of Executive Director's Preliminary Report and Petition for a Texas Natural Resource Conservation Commission Order Assessing Administrative Penalties and Requiring Certain Actions of Regional Waste Company, Texas Solid Waste Registration No. 62006.* June 30, 1995. 15 pages.
  14. TNRCC Interoffice Memorandum, From: Jeff Bertl, Field Investigator, Region 2, To: Stennie Meadours, Section Manager, Emergency Response and Assessment Section, *Request for State Funded Removal, 5200 N. Columbia, Plainview, Texas.* September 11, 1995. 25 pages.
  15. TNRCC Interoffice Memorandum, From: Mohammed Moheeth, Enforcement Coordinator, Waste Section, Enforcement Division, To: Stennie Meadours, Manager, Emergency Response and Assessment Section, Pollution Cleanup Division, *Regional Waste Company, Solid Waste Registration No. 62006, EPA ID No. TXD096055952, Referral of Regional Waste Company (RWC) to Pollution Cleanup Division.* September 27, 1996. 15 pages.
  16. Wesley G. Newberry, Leader, Superfund Site Discovery and Assessment Team, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Mr. Earl James, Stoller Enterprises, *Re: Notification to Perform Preliminary Assessment, Stoller Chemical Company, Inc. (TXD156273682), 5200 Columbia Street, Plainview, Texas.* October 12, 1996. 3 pages.
  17. Laura Ray, Attorney, Litigation Support Division, To: Mr. Ted Herring, President, Regional Waste Company, *Re: Enforcement Action against Regional Waste Company; S.W.R. No. 62006.* November 13, 1996. 9 pages.
  18. Glen Walkup, Environmental and Safety Manger, Environmental & safety Services, Inc., To: Mr. Mohammed Moheeth, TNRCC, Waste Section, Enforcement Division, *Re: Disposal of Hazardous Waste.* May 30, 1996. 4 pages.
  19. Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Mr. Earl James, Stoller Enterprises, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* November 14, 1996. 4 pages.
  20. Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Mr. Ted Herring,

President, Regional Waste Company, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* November 14, 1996. 4 pages.

21. Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Mr. William Schumann, FMC Corporation, Agricultural Chemical Group, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* November 14, 1996. 4 pages.
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23. Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Ms. Pamela G. Johnson, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* November 14, 1996. 4 pages.
24. Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, To: Ms. Sheila B. Long, Manager of Regulatory Affairs, Terra International, Inc., *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* November 14, 1996. 4 pages.
25. Glen Walkup, Manager, Environmental and Safety Services, To: Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* December 2, 1996. 2 pages.
26. Burton E. Gilpin, RG, CGH, CEG, Managing Principal, Dames & Moore, To: Wesley G. Newberry, Unit Manager, *Re: Stoller Chemical Company, Inc. Plainview, Texas, Industrial Solid Waste No. 80958, EPA ID No. TXD 156273682.* December 10, 1996. 1 page.
27. Carolyn S. Hesse, McDermott, Will & Emery, To: Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment

- Section, Pollution Cleanup Division, *Re: Terra International*. December 17, 1996. 3 pages.
28. John F. Stillmun, Counsel, To: Wesley G. Newberry, Unit Manager, Superfund Site Discovery and Assessment Program, Emergency Response and Assessment Section, Pollution Cleanup Division, *Re: Stoller Chemical Company, Inc. Plainview, Texas*. December 30, 1996. 2 pages.
  29. TNRCC Voluntary Cleanup Program Application, Stoller Enterprises, Inc. for Former Stoller Chemical Company, 5200 N. Columbia Street, Plainview, Texas, 79072. April 17, 1997. 8 pages.
  30. Dames & Moore, *Report of Phase I Environmental Site Assessment, Former Stoller Chemical Company Facility, 5200 North Columbia, Plainview, Texas*. April 17, 1997. 76 pages. Excerpt pages - 4.
  31. Peter Wehner, Project Manager, Voluntary Cleanup Section, Pollution Cleanup Division, To: Mr. Earl James, President, Stoller Enterprises, *Re: Former Stoller Chemical Company Facility, 5200 North Columbia, Plainview, Texas; VCP No. 511*. May 23, 1997. 1 page.
  32. Peter Wehner, Project Manager, Voluntary Cleanup Section, Pollution Cleanup Division, To: Mr. Earl James, President, Stoller Enterprises, *Re: Former Stoller Chemical Company Facility, 5200 North Columbia, Plainview, Texas; VCP No. 511*. August 11, 1997. 1 page.
  33. Jeff Bertl, TNRCC Region 2, *Regional Waste, ISW # 62002, EPA ID # TXD096055967, Follow-up Inspection*. October 3, 1997. 1 page.
  34. Peter Wehner, Project Manager, Voluntary Cleanup Section, Pollution Cleanup Division, To: Mr. Earl James, President, Stoller Enterprises, *Re: Former Stoller Chemical Company Facility, 5200 North Columbia, Plainview, Texas; VCP No. 511*. October 30, 1997. 1 page.
  35. Peter Wehner, Project Manager, Voluntary Cleanup Section, Pollution Cleanup Division, To: Mr. Earl James, President, Stoller Enterprises, *Re: Former Stoller Chemical Company Facility, 5200 North Columbia, Plainview, Texas; VCP No. 511*. December 11, 1997. 1 page.
  36. Don Fawn, TNRCC Emergency Response Unit, Typed notes of state funded removal action, *Regional Waste, Plainview, TX, R2*. Date unknown. 2 pages.
  37. Jeff Bertl, TNRCC Region 2, *Stoller Chemical Company, Case Development Inspection*. September 17, 1998. 10 pages.
  38. Texas Department of Water Resources, *Climatic Atlas of Texas*. December, 1983. 151 pages. Excerpt pages - 1.

39. Texas Board of Water Engineers, *Bulletin 6010, Geology and Ground-Water Resources of Hale County, Texas*. November 1960. 146 pages. Excerpt pages - 8.
40. Texas Water Development Board, *Report 313, Evaluation of Ground-Water Resources in Briscoe, Hale, and Swisher Counties, Texas*. February 1989. 33 pages. Excerpt pages - 6.
41. TNRCC Public Water Supply Records.
42. TNRCC Telephone Memo to the File, Call from: Marshall Cedilote, Call to: Dave Terry, *Subject: Stoller Chemical Company, Wellhead Protection Areas*. March 14, 2000. 1 page.

**WORKSHEET FOR COMPUTING HRS SITE SCORE**

<b>Pathway or Component</b>		<b>S</b>	<b>S<sup>2</sup></b>
<b>1.</b>	<b>Ground Water Migration Pathway Score (S<sub>gw</sub>)</b>	<b>12.20</b>	<b>148.84</b>
2a.	Surface Water Overland/Flood Migration	NS	N/A
2b.	Ground Water to Surface Water Migration	NS	N/A
2c.	Surface Water Migration Pathway Score (S <sub>sw</sub> ) Enter the larger of lines 2a and 2b as the pathway score.	NS	N/A
<b>3.</b>	<b>Soil Exposure Pathway Score (S<sub>s</sub>)</b>	<b>NS</b>	<b>N/A</b>
4.	Air Migration Pathway Score (S <sub>a</sub> )	NS	N/A
<b>5.</b>	<b>Total of S<sub>gw</sub><sup>2</sup> + S<sub>sw</sub><sup>2</sup> + S<sub>s</sub><sup>2</sup> + S<sub>a</sub><sup>2</sup></b>	148.84	
<b>6.</b>	<b>HRS Site Score</b> Divide the value on line 5 by 4 and take the square root.	<b>6.1</b>	

**TABLE 1**  
**GROUND WATER MIGRATION PATHWAY SCORESHEET**  
**Ogallala Aquifer System**

<u>Factor Categories and Factors</u>	<u>Maximum Value</u>	<u>Value Assigned</u>
<b><u>Likelihood of Release to an Aquifer</u></b>		
1. Observed Release	550	<u>0</u>
2. Potential to Release		<u>290</u>
2a. Containment (Ref. 1, p. 51596)	10	<u>10</u>
2b. Net Precipitation (Ref. 1, p. 51600; Ref. 38, p. 018)	10	<u>1</u>
2c. Depth to Aquifer (Ref. 1, p. 51600, Ref. 39, p. 013)	5	<u>3</u>
2d. Travel Time (Ref. 1, p. 51601, Ref. 40, p. 010)	35	<u>25</u>
2e. Potential to Release (Lines 2a(2b + 2c + 2d))	500	<u>290</u>
3. Likelihood of Release (Higher of Line 1 and 2e)	50	<u>290</u>
<b><u>Waste Characteristics</u></b>		
4. Toxicity/Mobility (Arsenic) (Ref. 1, p. 51601-51602; Ref. 2; Ref. 5, p. 013; Ref. 14, pp. 013, 017, 020)	*	<u>100</u>
5. Hazardous Waste Quantity (Ref. 1, pp. 51591-51592[default])	*	<u>10</u>
6. Waste Characteristics (Ref. 1, p. 51592)	100	<u>6</u>
<b><u>Targets</u></b>		
7. Nearest Well (Ref. 1, p. 51603; Ref. 41 [TNRCC Well #G0950057A])	50	<u>18</u>
8. Population:		
8a. Level I Concentrations	**	<u>0</u>
8b. Level II Concentrations	**	<u>0</u>
8c. Potential Contamination (Ref. 42)	**	<u>550.6</u>
8d. Population (Lines 8a + 8b + 8c)	**	<u>550.6</u>
* Maximum value applies to waste characteristics category.		
** Maximum value not applicable.		

**TABLE 1**  
**GROUND WATER MIGRATION PATHWAY SCORESHEET (concluded)**  
**Ogallala Aquifer System**

<u>Factor Categories and Factors</u>		<u>Maximum Value</u>	<u>Value Assigned</u>
<b><u>Targets</u></b>			
9.	Resources ( <i>Ref. 1, p. 51604; Ref. 40, pp. 006-005</i> )	5	<u>5</u>
10.	Wellhead Protection Area ( <i>Ref. 1, p. 51604; Ref. 42, p. 001</i> )	20	<u>5</u>
11.	Targets (Lines 7 + 8d + 9 + 10)	**	<u>578.8</u>
12.	Aquifer Score ((Lines 3 x 6 x 11)/82,500)***	100	<u>12.20</u>
<b><u>Ground Water Migration Pathway Score</u></b>			
13.	Pathway Score ( $S_{gw}$ ), (Highest value from Line 12 for all aquifers evaluated)***	100	<u>12.20</u>

Table 2  
GROUND WATER POTENTIAL POPULATION  
Ogallala Aquifer System

Distance from Stoller site (miles)	Well number	Owner	Population served	Distance weighted population
0 - ¼	N/A	N/A	N/A	N/A
¼ - ½	G0950057A	Pioneer Hi-Bred International	15	11
	G0950057B	Pioneer Hi-Bred International	15	
½ - 1	G0950057C	Pioneer Hi-Bred International	15	17
	G0950069A	Longacres Mobile Home Park	25	
1 - 2	G0950017A	Excel Corporation	225	2939
	G0950017B	Excel Corporation	225	
	G0950017C	Excel Corporation	225	
	G0950017D	Excel Corporation	225	
	G0950017E	Excel Corporation	225	
	G0950017F	Excel Corporation	225	
	G0950017G	Excel Corporation	225	
	G0950017H	Excel Corporation	225	
	G0950069B	Longacres Mobile Home Park	25	
	G0960065B	Seth Ward Water Supply Corp.	2050	
	G0950004D	Plainview Municipal Water System	2058	
	G0950004E	Plainview Municipal Water System	2058	
	G0950004H	Plainview Municipal Water System	2058	
2 - 3	G0950004A	Plainview Municipal Water System	2058	2122
	G0950004C	Plainview Municipal Water System	2058	
	G0950004G	Plainview Municipal Water System	2058	
	G0950004F	Plainview Municipal Water System	2058	
	G0950004J	Plainview Municipal Water System	2058	
	G0950004O	Plainview Municipal Water System	2058	
3 - 4	G2190002C	Kress Municipal Water System	392	417
	G2190002F	Kress Municipal Water System	392	
	G0950020B	Shady Lane Mobile Home Park	40	

	G0950004L	Plainview Municipal Water System	2058	
	G0950004M	Plainview Municipal Water System	2058	
	G0950004N	Plainview Municipal Water System	2058	