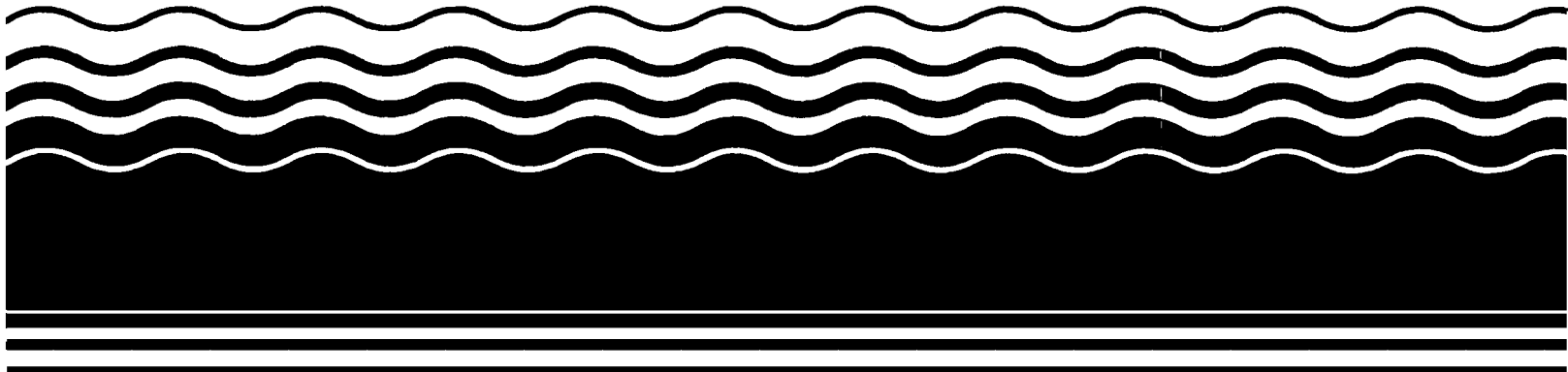


**PB96-963102
EPA/ESD/R06-96/097
June 1996**

**EPA Superfund
Explanation of Significant Difference
for the Record of Decision:**

**Bailey Waste Disposal,
Bridge City, TX
2/8/1996**



**EPA Superfund
Explanation of Significant
Differences for the
Record of Decision:**

**Bailey Waste Disposal Superfund Site
Orange County, Texas
02/08/96**

EXPLANATION OF SIGNIFICANT DIFFERENCE

I. INTRODUCTION

Site Name and Location:

Bailey Waste Disposal Superfund Site
Orange County, Texas

Lead and Support Agencies:

U.S. Environmental Protection Agency (EPA) -- Lead Agency
Texas Natural Resource Conservation Commission (TNRCC) -- Support Agency

Statute that required Explanation of Significant Difference (ESD):

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 117(c) and National Oil and Hazardous Substances Contingency Plan (NCP), Section 300.435(c)(2)(i).

Purpose of ESD

The purpose of an ESD is to describe changes in the remedial action due to unforeseen conditions encountered at the site during implementation of the Record of Decision (ROD). Changes found in the conditions at the Bailey Waste Disposal site require the EPA to modify the remedial action described in the June 28, 1988, ROD. As discussed in the ROD, affected marsh sediments (North Marsh Waste) were to be relocated to the site's Waste Channel Area, stabilized and capped. The North Marsh Waste constitutes approximately four percent (6,000 cubic yards) of the estimated total site waste volume of 156,000 cubic yards and is distinct from the rest of the site waste because of its location in a marsh. The purpose of this ESD is to inform the public that the North Marsh Waste will be taken offsite for disposal in a Class 1 industrial waste landfill. Circumstances that gave rise to the need for this ESD include:

- the opportunity to expedite the North Marsh Waste remedy component by taking this waste offsite for disposal during this current winter construction season;

- remediation activities within the Waste Channel Area, which was to have received the marsh affected sediments, are currently being reevaluated due to waste stabilization problems encountered at the site;
- expediting the excavation of the North Marsh Waste, which is the only site waste not contained within a levee, will remove this waste from direct contact with the marsh surface waters; and
- an estimated \$900,000 in costs savings when compared to previous construction bids for the North Marsh Waste remedy component.

Administrative Record:

This ESD will become part of the Administrative Record of the Bailey Waste Disposal Superfund site. The administrative record is available to the public for review during regular business hours at the following locations:

U.S. Environmental
Protection Agency, Region 6
12th Floor Library
1445 Ross Avenue
Dallas, Texas 75202-2733
(214)665-6427 or (214)665-6424

Nederland Public Library
1903 Atlanta
Nederland, Texas 77627
(409)722-1255

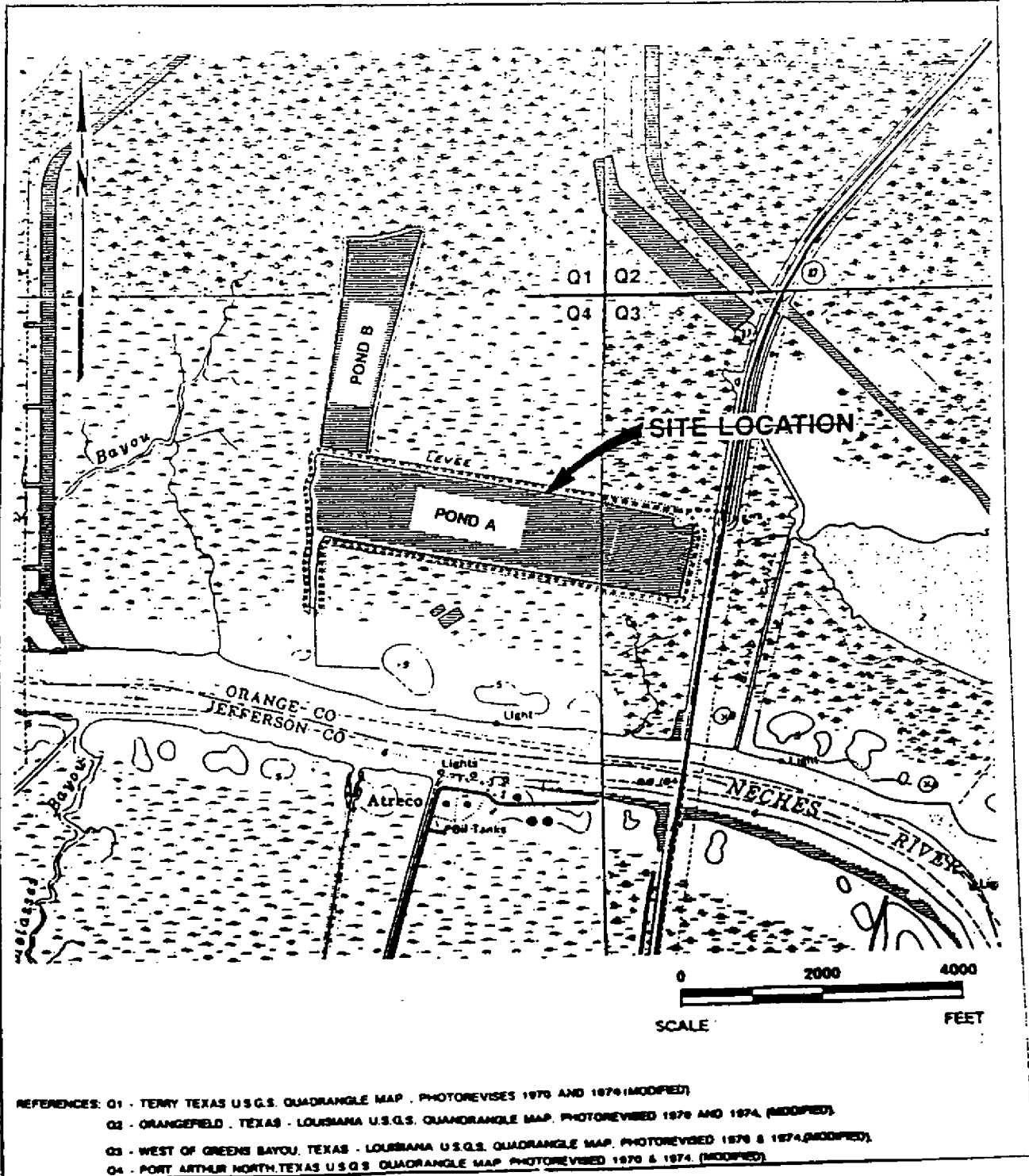
II. SUMMARY OF SITE HISTORY, CONTAMINATION PROBLEMS, AND SELECTED REMEDY

The Bailey Waste Disposal Superfund site is an inactive waste disposal site located approximately three miles southwest of Bridge City in Orange County, Texas. The site was part of a tidal marsh near the confluence of the Neches River and Sabine Lake. Two ponds, A and B, were constructed on the property as part of the Bailey Fish Camp in the early 1950's by dredging the marsh and piling the sediments to form levees which surround the ponds (see Figure 1). The fish camp was active until September 1961, when it was destroyed by Hurricane Carla which introduced saline waters into the ponds, killing the freshwater fish. The site, including the two rectangular ponds, occupies approximately 280 acres.

Industrial waste (e.g., sludge from local petrochemical industries) was disposed of within the levees along the north and east margins of Pond A during the 1950s and 1960s. This waste contains a wide variety of volatile organic compounds, aromatic hydrocarbons (i.e., ethylbenzene, styrene, benzene), and heavy metals (i.e., lead, arsenic, chromium, zinc). The site was also used to dispose of residential trash. The Bailey Waste Disposal site was closed in 1971.

FIGURE 1

VICINITY MAP
BAILEY WASTE DISPOSAL SITE
ORANGE COUNTY, TEXAS



In October 1984, the site was proposed for the National Priorities List (NPL) of Federal Superfund sites. The site was placed on the NPL in 1986. A remedial investigation was completed for the site in October 1987, and a feasibility study was completed in April 1988. On June 28, 1988, the site's Record of Decision was signed. The remedial action requirements are discussed below.

Remedy Set Forth in the Record of Decision

The overall site remedy, as originally described in the ROD, addressed the environmental threat at the site by consolidating, stabilizing and capping all site waste to prevent human contact and future migration. The specific ROD remedy component pertaining to the affected marsh sediments called for relocation of the affected sediments from the marsh to the Waste Channel, followed by stabilization and capping of the Waste Channel.

III. DESCRIPTION OF THE SIGNIFICANT DIFFERENCES AND THE BASIS FOR THOSE DIFFERENCES

This ESD changes one component of the original remedy. The affected sediments from the site's North Marsh Waste Area (marsh waste -- tarry waste and underlying-affected sediments) will be taken offsite for disposal in a Class 1 industrial waste landfill rather than being relocated, stabilized and capped onsite. By taking the marsh waste offsite to a landfill, excavation of the marsh waste can take place during this current winter construction season when the waste handling properties are optimal (due to lower ambient air temperatures, waste is less viscous and less volatile). The excavation of the marsh waste, which is the only site waste not contained within a levee, will remove this waste from direct contact with the marsh surface waters.

Onsite disposal of the marsh waste would require making improvements to Pit A (located adjacent to the Waste Channel) prior to placement of marsh waste into Pit A. These improvements would require significant lead time and would postpone the North Marsh Area waste excavation activities until at least the 1996/1997 winter construction season. Remediation activities within the Waste Channel Area, which were to have received the marsh affected sediments, are currently being reevaluated due to waste stabilization problems encountered at the site.

In addition to being more timely, implementation of this ESD will result in approximately \$900,000 in cost-savings. These projected savings are based on a review of original construction bids for making improvements to Pit A, placement of waste into the pit, and capping the pit (estimated specific costs of \$1,400,000) versus the estimated transportation costs and disposal fees of \$500,000 for taking the marsh waste to a offsite landfill. Additional savings will be found in not having to perform specific long-term maintenance activities associated with keeping the marsh waste onsite (See Table 1 for comparison of the original remedy versus offsite disposal).

**TABLE 1
SIGNIFICANT DIFFERENCES – NORTH MARSH WASTE**

ORIGINAL REMEDY	OFFSITE DISPOSAL
<u>Description:</u> <ul style="list-style-type: none"> ○ Consolidate waste on site, stabilize and cap. 	<u>Description:</u> <ul style="list-style-type: none"> ○ Offsite disposal of North Marsh Area waste in a Class 1 industrial waste landfill.
<u>Economic Considerations:</u> Both alternatives contain certain common elements that are considered baseline costs. These include excavation and handling of waste.	
<u>Specific Costs Items:</u> <ul style="list-style-type: none"> ○ Improvements to receiving cell. ○ Placement of materials in receiving cell (Pit A). ○ Capping of receiving cell. Estimated specific costs = \$1,400,000.*	<u>Specific Costs Items:</u> <ul style="list-style-type: none"> ○ Transportation of waste material to Class 1 industrial waste landfill. ○ Disposal fees. Estimated specific costs = \$500,000.**
<u>Other Considerations:</u> <ul style="list-style-type: none"> ○ North Marsh waste would remain onsite and would require long-term maintenance. ○ Unlikely that work could be completed during 1995/1996 winter construction season, thereby causing the waste to remain in the North Marsh until the 1996/1997 winter construction season. 	<u>Other Considerations:</u> <ul style="list-style-type: none"> ○ North Marsh waste removed from site, therefore no long-term maintenance requirements and costs specifically for the North Marsh waste. ○ Could be completed within the next few months.

* Based on review of construction bids for this work.

** Based on the following assumptions:

- 6,000 cubic yards of material;
- 10 percent increase when stabilized;
- predisposal stabilization of the excavated material will occur onsite (cost savings will be realized if all or part of the excavated material does not require predisposal stabilization; and
- potential cost savings may be realized if the predisposal stabilization occurs at the disposal facility.

All current applicable federal and state regulations will be met for the transport of the marsh waste to the receiving Class 1 industrial waste landfill. In accordance with EPA's Offsite Policy (40 C.F.R. Section 300.440), and specifically with regards to the receiving landfill (Browning Ferris Industries Anahuac Landfill), the TNRCC in an October 27, 1995, Current Assessment of Compliance Summary stated:

- in general, the facility appears to be operating within the limitations set in its permit;
- Compliance Evaluation Inspections performed in the last five years at the subject facility noted no alleged violations;
- there have not been any spills reported at the subject facility in the last five years;
- no enforcement action is pending; and
- no prior enforcement action has occurred in the last five years for this facility.

The EPA has determined that the Resource Conservation and Recovery Act (RCRA) land disposal restrictions are not applicable for the offsite disposal of the North Marsh Area waste. EPA's rationale supporting this determination are described in an October 31, 1995, EPA memorandum. Specifically, the following were discussed in the memorandum:

- Based on currently available information, the site's North Marsh Area waste is not a RCRA listed waste as defined in Subpart D of 40 C.F.R. Section 261; and
- Based on information provided in the Technical Memorandum Supplemental North Marsh Area Site Investigation and Evaluation of Original Remedy (GeoSyntec Consultants, October 1995), the site's North Marsh Area waste does not exhibit a hazardous characteristic as defined in 40 C.F.R. Section 261 (i.e., ignitability, corrosivity, reactivity, or toxicity).

IV. SUPPORT AGENCY COMMENTS

The Texas Natural Resource Conservation Commission found no objections to the draft of this ESD and concurs with the proposal, as evidenced by the attached letter dated December 15, 1995.

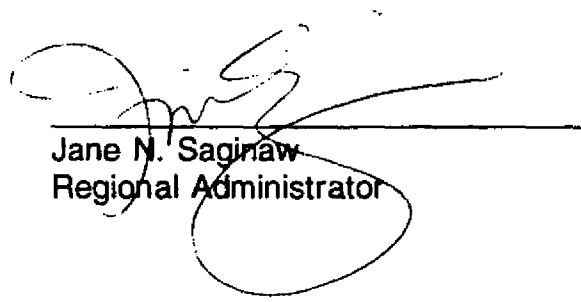
V. PUBLIC PARTICIPATION ACTIVITIES

This ESD will become part of the Administrative Record for the Bailey Waste Disposal Superfund site, will be made available to the public, but will not be distributed for public comment. For additional information regarding this ESD, please contact the EPA Project Manager for the Bailey Waste Disposal Superfund site:

Chris Villarreal
U.S. Environmental Protection Agency
1445 Ross, Avenue (6SF-AT)
Dallas, Texas 75202-2733
(214) 665-6758

VI. STATUTORY DETERMINATIONS

Considering the new information developed during the remedial action and the resulting changes from the selected remedy described in the ROD, the EPA believes that the remedy remains protective of human health and the environment. The revised remedy utilizes permanent solutions to the maximum extent practicable for this site and is cost-effective. It complies with the NCP and other federal and state requirements that are applicable or relevant and appropriate to this remedial action.



Jane N. Saginaw
Regional Administrator

FEB 08 1996

Date

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

December 15, 1995

SENT VIA FAX & CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Mr. Chris Villarreal
Remedial Project Manager
Bailey Waste Disposal Superfund Site
U.S. Environmental Protection Agency
Region 6, 6H-ET
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Draft Explanation of Significant Differences
Bailey Waste Disposal Superfund Site, Orange County, Texas

Dear Chris:

I am writing to provide Texas Natural Resource Conservation Commission (TNRCC) comments to the referenced draft document.

The TNRCC finds no objections to the draft Explanation of Significant Differences and concurs with the proposal. Please contact me with any questions you may have concerning these comments or any other issues at the Bailey site at (512) 239-2030.

Sincerely,

A handwritten signature in black ink, appearing to read "Trey Collins".

E.R. (Trey) Collins, III
Project Manager
Superfund Engineering Section
Pollution Cleanup Division

TC/tc

RECEIVED
NOV 20 1995
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 6
6H-ET

Prepared for
United States Environmental Protection Agency
Region 6

ADMINISTRATIVE RECORD INDEX

**BAILEY WASTE DISPOSAL SUPERFUND SITE
EXPLANATION OF SIGNIFICANT DIFFERENCES**

EPA ID No. TXD 980864649

ESS VI
Work Assignment No. ESS06014

Chris Villarreal
Remedial Project Manager
U.S. EPA Region 6

Prepared by

DPRA Incorporated
717 North Harwood Street
Suite 1300
Dallas, TX 75201

P. 6114.0677
March 7, 1996

INTRODUCTION

Section 113(j)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9613(j)(1), provides that judicial review of any issues concerning the adequacy of a response action shall be limited to the administrative record compiled for the site. CERCLA, as amended by the Superfund Amendments and Reauthorization Act (SARA), requires the U.S. Environmental Protection Agency (EPA) to compile documents that form the basis for the selection of the remedial CERCLA and SARA response actions. These supporting documents form an "administrative record" (AR), which the Agency must provide for public review. The ARs are maintained at relevant EPA Regional Offices as well as "at or near the facility at issue."

The following Administrative Record Index was compiled in accordance with OSWER Directive Number 9833.3A-1, "Final Guidance on Administrative Records for Decisions on Selection of CERCLA Response Actions" (December 3, 1990). Documents listed as bibliography sources in response decision documents may not be listed in the AR Index. An index to the "Compendium of CERCLA Response Selection Guidance Documents" is enclosed in the AR. The AR Index file is compiled as documents related to the response action are being generated. All documents that are clearly relevant and nonprivileged are placed in the record file, entered into the index, and made available to the public as soon as possible. The documents included in the index are predominantly arranged in chronological order. EPA may send supplemental AR volumes and indexes to the designated repository. These supplements should be placed with the initial record file.

The AR Index helps readers locate and retrieve documents in the file. It also provides an overview of the response action history. The index includes the following information for each document:

- **AR Page No.** - The sequential numbers stamped on each page of the AR. The six digit numbers are located in the upper right corner of each page.
- **Document Date** - The date the document was published and/or released. "Undated" means no date was recorded.
- **No. of Pages** - Total number of printed pages in the document, including attachments.
- **Author** - Name and title of the originator.
- **Company/Agency** - Originator's affiliation.
- **Recipient** - Name, title, and affiliation of the recipient.
- **Document Type** - General identification, e.g., correspondence, Remedial Investigation Report, Record of Decision, etc.
- **Document Title** - Descriptive title or synopsis.

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000001 - 000027
DOCUMENT DATE: 12/21/90
NUMBER OF PAGES: 027
AUTHOR: Harding Lawson Associates (HLA)
COMPANY/AGENCY: Consultant for Bailey Site Settlers Committee (BSSC)
RECIPIENT: BSSC
DOCUMENT TYPE: Work Plan
DOCUMENT TITLE: Work Plan for Sediment Bioassays and Benthic Community
Characterization

DOCUMENT NUMBER: 000028 - 000147
DOCUMENT DATE: 10/09/91
NUMBER OF PAGES: 120
AUTHOR: HLA
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: BSSC
DOCUMENT TYPE: Quality Assurance Project Plan (QAPjP)
DOCUMENT TITLE: QAPjP

DOCUMENT NUMBER: 000148 - 000457
DOCUMENT DATE: 01/03/92
NUMBER OF PAGES: 310
AUTHOR: HLA
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: BSSC
DOCUMENT TYPE: Sampling Plan
DOCUMENT TITLE: Final Sampling and Monitoring Plan

DOCUMENT NUMBER: 000458 - 000459
DOCUMENT DATE: 02/18/92
NUMBER OF PAGES: 002
AUTHOR: Community Relations Staff
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: EPA Update
DOCUMENT TITLE: Superfund Site Update - Remedial Design near Completion

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000460 - 000461
DOCUMENT DATE: 08/05/92
NUMBER OF PAGES: 002
AUTHOR: Community Relations Staff
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: Fact Sheet
DOCUMENT TITLE: Superfund Site Fact Sheet - Remedial Action Contractor Selected

DOCUMENT NUMBER: 000462 - 000477
DOCUMENT DATE: 09/25/92
NUMBER OF PAGES: 016
AUTHOR: HLA
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: BSSC
DOCUMENT TYPE: Evaluation Plan
DOCUMENT TITLE: Final Waste/Oil Interface Evaluation Plan

DOCUMENT NUMBER: 000478 - 000541
DOCUMENT DATE: 11/11/92
NUMBER OF PAGES: 064
AUTHOR: HLA
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: BSSC
DOCUMENT TYPE: Report
DOCUMENT TITLE: Report on Sediment Bioassays and Benthic Community Characterizations

DOCUMENT NUMBER: 000542 - 000546
DOCUMENT DATE: 12/17/92
NUMBER OF PAGES: 005
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Sam Becker, Chief, Superfund Enforcement Branch, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter w/Enclosure
DOCUMENT TITLE: Information from HLA about materials in marsh area north of Pond A

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000547 - 000548
DOCUMENT DATE: 02/12/93
NUMBER OF PAGES: 002
AUTHOR: Community Relations Staff
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: Fact Sheet
DOCUMENT TITLE: Superfund Site Fact Sheet - Remedial Action Field Activities Underway

DOCUMENT NUMBER: 000549 - 000550
DOCUMENT DATE: 02/23/93
NUMBER OF PAGES: 002
AUTHOR: Chris Villarreal, Remedial Project Manager (RPM), Superfund Enforcement Branch
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: U.S. EPA Region 6 Site File
DOCUMENT TYPE: Record of Communication
DOCUMENT TITLE: Summary of meeting with BSSC representatives

DOCUMENT NUMBER: 000551 - 000591
DOCUMENT DATE: 03/29/93
NUMBER OF PAGES: 041
AUTHOR: Unspecified
COMPANY/AGENCY: U.S. EPA Region 9
RECIPIENT: U.S. EPA Region 6 Site File
DOCUMENT TYPE: Bibliography Index
DOCUMENT TITLE: Index for Compendium of CERCLA Response Selection Guidance Documents

DOCUMENT NUMBER: 000592 - 000598
DOCUMENT DATE: 04/19/93
NUMBER OF PAGES: 007
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Sam Becker, Chief, Superfund Enforcement Branch, U.S. EPA Region 6
DOCUMENT TYPE: Letter w/Enclosure
DOCUMENT TITLE: Confirmation of 04/12/93 meeting between BSSC representatives and EPA. Letter requests modification of water structure plans.

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000599 - 000601
DOCUMENT DATE: 05/11/93
NUMBER OF PAGES: 003
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Notification of styrene-like material from the site on 05/11/93

DOCUMENT NUMBER: 000602 - 000604
DOCUMENT DATE: 06/11/93
NUMBER OF PAGES: 003
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Notification of styrene-like material from site on 06/11/93

DOCUMENT NUMBER: 000605 - 000608
DOCUMENT DATE: 07/08/93
NUMBER OF PAGES: 004
AUTHOR: Community Relations Staff
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: EPA Update
DOCUMENT TITLE: Superfund Site Update - Remedial Action Field Activities Progressing

DOCUMENT NUMBER: 000609 - 000611
DOCUMENT DATE: 07/09/93
NUMBER OF PAGES: 003
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Notification of sighting of styrene-like material from site on 07/09/93

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000612 - 000614
DOCUMENT DATE: 07/12/93
NUMBER OF PAGES: 003
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Notification of sighting of styrene-like material from site on 07/12/93

DOCUMENT NUMBER: 000615 - 000617
DOCUMENT DATE: 07/14/93
NUMBER OF PAGES: 003
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Notification of sighting of styrene-like material from site on 07/14/93

DOCUMENT NUMBER: 000618 - 000687
DOCUMENT DATE: 09/14/93
NUMBER OF PAGES: 070
AUTHOR: John Wilder, Field Investigator, Region 10, Beaumont, Texas
COMPANY/AGENCY: Texas Natural Resource Conservation Commission (TNRCC)
RECIPIENT: Stennie Medours, Manager, Emergency Response and Assessment, Pollution Cleanup Division, TNRCC
DOCUMENT TYPE: Memorandum
DOCUMENT TITLE: Summary report of sampling conducted on 07/21/93

DOCUMENT NUMBER: 000688 - 000692
DOCUMENT DATE: 09/21/93
NUMBER OF PAGES: 005
AUTHOR: John Lindsey, Chief Coastal Resource Coordinator
COMPANY/AGENCY: National Oceanic & Atmospheric Administration (NOAA)
RECIPIENT: Debra L. Baker, Mayor, Day, Caldwell & Keeton, L.L.P., Counsel for BSSC
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Natural Resource Trustees' (NRT) comments on "Report on Sediment Bioassays and Benthic Community Characterizations"

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000693 - 000696
DOCUMENT DATE: 09/21/93
NUMBER OF PAGES: 004
AUTHOR: Ron Gouguet, Coastal Resource Coordinator
COMPANY/AGENCY: NOAA
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6
DOCUMENT TYPE: Letter w/Enclosure
DOCUMENT TITLE: NOAA requests additional investigations to characterize releases of hazardous substances to marsh environment

DOCUMENT NUMBER: 000697 - 000705
DOCUMENT DATE: 11/09/93
NUMBER OF PAGES: 009
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Sam Becker, Chief, Superfund Enforcement Branch, U.S. EPA Region 6, et al.
DOCUMENT TYPE: Letter w/Enclosure
DOCUMENT TITLE: Requested information about proposed repair of East Dike and to obtain EPA's agreement for use of 4-foot dike elevation to repair East Dike

DOCUMENT NUMBER: 000706 - 000708
DOCUMENT DATE: 11/24/93
NUMBER OF PAGES: 003
AUTHOR: E.R. Collins III, Project Manager, Superfund Engineering Section, Pollution Cleanup Division
COMPANY/AGENCY: TNRCC
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Section, U.S. EPA Region 6
DOCUMENT TYPE: Letter
DOCUMENT TITLE: TNRCC's comments on EPA's draft memorandum explaining the basis for invoking an interim Applicable or Relevant and Appropriate Requirements (ARARs) waiver

DOCUMENT NUMBER: 000709 - 000712
DOCUMENT DATE: 12/09/93
NUMBER OF PAGES: 004
AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Debra L. Baker, Mayor, Day, Caldwell & Keeton, L.L.P., Counsel for BSSC
DOCUMENT TYPE: Letter w/Enclosure
DOCUMENT TITLE: EPA will invoke interim measure ARARs waiver for 300-foot segment of East Dike

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
 SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000713 - 000720
 DOCUMENT DATE: 01/10/94
 NUMBER OF PAGES: 008
 AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
 COMPANY/AGENCY: U.S. EPA Region 6
 RECIPIENT: Ingrid K. Hansen, Natural Resource Damage Assessment Team,
 Texas General Land Office
 DOCUMENT TYPE: Cover Letter w/Enclosure
 DOCUMENT TITLE: Enclosure of analytical summary tables from recent North Marsh
 Waste Evaluation sampling that occurred on 11/11/93 and
 11/18/93

DOCUMENT NUMBER: 000721 - 000731
 DOCUMENT DATE: 02/14/94
 NUMBER OF PAGES: 011
 AUTHOR: Debra L. Baker, Counsel for BSSC
 COMPANY/AGENCY: Mayor, Day, Caldwell, & Keeton, L.L.P.
 RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA
 Region 6
 DOCUMENT TYPE: Cover Letter w/Enclosures
 DOCUMENT TITLE: Enclosure of results of tests performed in north marsh at
 NRTs' request

DOCUMENT NUMBER: 000732 - 000733
 DOCUMENT DATE: 03/08/94
 NUMBER OF PAGES: 002
 AUTHOR: Ron Gouguet, Coastal Resource Coordinator
 COMPANY/AGENCY: NOAA
 RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA
 Region 6
 DOCUMENT TYPE: Letter w/o Enclosure
 DOCUMENT TITLE: NOAA requests resampling sediments to determine if chemical
 components identified in carry mass have migrated into marsh
 sediments

DOCUMENT NUMBER: 000734 - 000739
 DOCUMENT DATE: 03/28/94
 NUMBER OF PAGES: 006
 AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
 COMPANY/AGENCY: U.S. EPA Region 6
 RECIPIENT: U.S. EPA Region 6 Site File
 DOCUMENT TYPE: Record of Communication w/Enclosures
 DOCUMENT TITLE: Conference call between EPA, BSSC, and NRTs to discuss ongoing
 investigation in marsh area north of north dike area

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000740 - 000827
DOCUMENT DATE: 04/18/94
NUMBER OF PAGES: 088
AUTHOR: HLA
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: BSSC
DOCUMENT TYPE: Demonstration Report
DOCUMENT TITLE: Final North Marsh Waste Remediation Demonstration

DOCUMENT NUMBER: 000828 - 000837
DOCUMENT DATE: 04/29/94
NUMBER OF PAGES: 010
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA Region 6
DOCUMENT TYPE: Cover Letter w/Enclosure
DOCUMENT TITLE: Enclosure of "Marsh Sediment Sampling and Analysis Plan" developed by BSSC in response to 03/14/94 request by EPA and NRTs to do additional sampling of sediments in marsh north of site

DOCUMENT NUMBER: 000838 - 000850
DOCUMENT DATE: 05/11/94
NUMBER OF PAGES: 013
AUTHOR: George L. Pettigrew, Senior Regional Representative
COMPANY/AGENCY: Agency for Toxic Substances and Disease Registry, Region 6
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA Region 6
DOCUMENT TYPE: Memorandum w/Enclosure
DOCUMENT TITLE: Health Consultation

DOCUMENT NUMBER: 000851 - 000870
DOCUMENT DATE: 07/18/94
NUMBER OF PAGES: 020
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA Region 6
DOCUMENT TYPE: Cover Letter w/Enclosure
DOCUMENT TITLE: Enclosure of "Marsh Sediment Sampling and Analysis Plan"

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000871 - 000877
DOCUMENT DATE: 08/23/94
NUMBER OF PAGES: 007
AUTHOR: Debra L. Baker, Counsel for BSSC
COMPANY/AGENCY: Mayor, Day, Caldwell & Keeton, L.L.P.
RECIPIENT: Sam Becker, Chief, Superfund Enforcement Section, U.S. EPA
Region 6, et al.
DOCUMENT TYPE: Letter
DOCUMENT TITLE: Request to waive dike elevation (floodplain) ARAR for north
marsh remediation

DOCUMENT NUMBER: 000878 - 000879
DOCUMENT DATE: 09/02/94
NUMBER OF PAGES: 002
AUTHOR: Ron Gouguet, Coastal Resource Coordinator
COMPANY/AGENCY: NOAA
RECIPIENT: Chris Villarreal, RPM, Superfund Enforcement Branch, U.S. EPA
Region 6
DOCUMENT TYPE: Letter
DOCUMENT TITLE: NRTs' comments on the BSSC's request to waive dike elevation
(floodplain) ARAR for north marsh remediation. Letter states
BSSC's request for ARAR waiver should be granted with
conditions outlined in letter.

DOCUMENT NUMBER: 000880 - 000883
DOCUMENT DATE: 09/13/94
NUMBER OF PAGES: 004
AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: U.S. EPA Region 6 Site File
DOCUMENT TYPE: Memorandum
DOCUMENT TITLE: Documentation and explanation for basis of invoking interim
measure ARAR waiver

DOCUMENT NUMBER: 000884 - 000885
DOCUMENT DATE: 09/13/94
NUMBER OF PAGES: 002
AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Bailey Task Force Administrator, c/o Debra L. Baker, Mayor,
Day, Caldwell & Keeton, L.L.P.
DOCUMENT TYPE: Letter w/o Enclosures
DOCUMENT TITLE: EPA will invoke interim measure ARAR waiver for north marsh
remediation activities

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 000886 - 000975
DOCUMENT DATE: 10/11/94
NUMBER OF PAGES: 090
AUTHOR: Horizon Environmental Services, Inc.
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: U.S. EPA Region 6 and BSSC NRTs
DOCUMENT TYPE: Cover Letter w/Soil Sampling and Analysis Results
DOCUMENT TITLE: Results of the North Marsh Sediment and Soil Sampling and Analysis

DOCUMENT NUMBER: 000976 - 000995
DOCUMENT DATE: 08/15/95
NUMBER OF PAGES: 020
AUTHOR: GeoSyntec Consultants
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: U.S. EPA Region 6
DOCUMENT TYPE: Work Plan
DOCUMENT TITLE: Work Plan for Focused Feasibility Study, Revision 1

DOCUMENT NUMBER: 000996 - 001026
DOCUMENT DATE: 08/17/95
NUMBER OF PAGES: 031
AUTHOR: GeoSyntec Consultants
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: U.S. EPA Region 6
DOCUMENT TYPE: Sampling and Analysis Plan
DOCUMENT TITLE: Sampling and Analysis Plan for Supplemental Site Investigation for Focused Feasibility Study, Revision 1

DOCUMENT NUMBER: 001027 - 001030
DOCUMENT DATE: 09/01/95
NUMBER OF PAGES: 004
AUTHOR: Community Relations Staff
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: EPA Update on Activities at Bailey Waste Disposal Site
DOCUMENT TITLE: Superfund Site Update - Current Project Activities

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 001031 - 001035
DOCUMENT DATE: 09/27/95
NUMBER OF PAGES: 005
AUTHOR: E.R. Collins III, Project Manager, Superfund Engineering
Section, Pollution Cleanup Division
COMPANY/AGENCY: TNRCC
RECIPIENT: Jacqueline McKendry, Parsons Engineering Sciences, Inc.
DOCUMENT TYPE: Letter w/Enclosures
DOCUMENT TITLE: Clarification about TNRCC's special waste requirements as they
relate to potential landfill disposal of waste to be excavated
from north marsh area

DOCUMENT NUMBER: 001036 - 001081
DOCUMENT DATE: 10/06/95
NUMBER OF PAGES: 046
AUTHOR: GeoSyntec Consultants
COMPANY/AGENCY: Consultant for BSSC
RECIPIENT: U.S. EPA Region 6
DOCUMENT TYPE: Memorandum
DOCUMENT TITLE: Technical Memorandum - Supplemental, North Marsh Area, Site
Investigation and Evaluation of Original Remedy

DOCUMENT NUMBER: 001082 - 001084
DOCUMENT DATE: 10/31/95
NUMBER OF PAGES: 003
AUTHOR: Chris Villarreal, RPM, Superfund Enforcement Branch
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: U.S. EPA Region 6 Site File
DOCUMENT TYPE: Memorandum
DOCUMENT TITLE: Documentation about applicability of Resource Conservation and
Recovery Act's land disposal restrictions to off-site disposal
alternative

DOCUMENT NUMBER: 001085 - 001086
DOCUMENT DATE: 11/06/95
NUMBER OF PAGES: 002
AUTHOR: E.R. Collins III, Project Manager, Superfund Engineering
Section, Pollution Cleanup Division
COMPANY/AGENCY: TNRCC
RECIPIENT: Jacqueline McKendry, Parsons Engineering Science, Inc.
DOCUMENT TYPE: Cover Letter w/Enclosure
DOCUMENT TITLE: Enclosure of TNRCC's Compliance Summary for Browning Ferris
Industries Anahuac landfill

ADMINISTRATIVE RECORD INDEX

ESD

SITE NAME: BAILEY WASTE DISPOSAL SITE
SITE NUMBER: TXD 980864649

DOCUMENT NUMBER: 001087 - 001087
DOCUMENT DATE: 12/15/95
NUMBER OF PAGES: 001
AUTHOR: E.R. Collins III, Project Manager, Superfund Engineering
Section, Pollution Cleanup Division
COMPANY/AGENCY: TNRCC
RECIPIENT: Chris Villarreal, RPM, U.S. EPA Region 6
DOCUMENT TYPE: Letter
DOCUMENT TITLE: TNRCC concurs with the draft Explanation of Significant
Differences (ESD) proposal

DOCUMENT NUMBER: 001088 - 001096
DOCUMENT DATE: 02/08/96
NUMBER OF PAGES: 009
AUTHOR: Jane N. Saginaw, Regional Administrator
COMPANY/AGENCY: U.S. EPA Region 6
RECIPIENT: Public
DOCUMENT TYPE: Decision Document
DOCUMENT TITLE: "EPA Superfund ESD for the Record of Decision: Bailey Waste
Disposal Superfund Site"