

Louisiana Department of Environmental Quality (LDEQ)

Responses to Public Inquiries For The Phase I Removal Action Plan Of the Marine Shale Processors Site (AI# 5414)

The Department is committed to facilitating public involvement and input on the clean-up and remediation of the Marine Shale Processors site in Morgan City, Louisiana. This publication serves to notify the residents of Morgan City that clean-up of the facility is initiated. The LDEQ's responses to common questions and comments are presented below.

1. What is the objective of the Phase I Removal Action Plan of the Marine Shale Processors site?

The objective of the Phase I Removal Action Plan is the containment of primary ash and untreated hazardous wastes by removal of these materials from the site and disposal at a permitted hazardous waste facility to prevent migration of waste off-site and to prevent exposure to human and environmental receptors.

2. What is the difference between the primary ash and secondary ash?

The primary ash is the result of the initial burning of the waste material through the incinerator. This material was often treated further when contaminant concentrations exceeded regulatory levels. This further treatment involved heating the material to a molten state followed by a quick cool-down which resulted in a glass-like vitrified material also referred to as secondary ash. Most of the tanks and containers on-site are anticipated to contain primary ash. This material is of concern because it is expected to fail Toxicity Characteristic Leachate Procedure (TCLP) standards meaning that the material can readily leach contaminants under environmental conditions. The secondary treatment process or vitrification generally led to the entrapment of contaminants in a glass-like material that is more environmentally stable and less likely to fail the TCLP. This secondary material was used as a fill material at the Marine Shale Processors facility. However, due to the reduced potential for this material to leach contaminants, it will be addressed at a later time.

3. What is included in the Phase I Removal Action?

Implementation of the Phase I Removal Action will involve the following general sequence over approximately nine months. Additional and more detailed information will be made available after approval of the contractor's Site Work Plan. Selection of the prime contractor, Weston Soutions, Inc., was completed in April 2007.

- Submission of a Site Work Plan that describes the methodology for performing the required tasks for LDEQ review and approval. A copy of the approved work plan will be made available for public review.
- During clean-up activity, efforts will be made to control dust and run-off to limit the amount of materials that may travel off-site. It is anticipated that the prime contractor will begin site work in August 2007.
- Initial storm water management will be needed for site access and clean-up activities. It is anticipated that storm water will be treated on-site and discharged after sampling confirms all contaminants are below the permitted discharge limits. In the event that storm water and/or process water does not meet discharge limits, it will be disposed at a permitted facility.
- Removal of hazardous solid and liquid material from the 13 tanks specified for the Phase I Removal Action and off-site disposal of this material at an approved RCRA Subtitle C disposal facility. Most of this material will require stabilization before disposal.
- The 13 tanks addressed in the Phase I Removal Action will be decontaminated and dismantled. The tank and piping material will either be scrapped or disposed of at an approved facility.

4. Why are there two phases?

The Department has separated the initial removal action into two phases. Some of the tanks are in deteriorating conditions and are severely corroded. In order to prevent a catastrophic release to the environment, those tanks determined to be in critical condition were selected for an expedited removal action (Phase I). The second phase will cover removal of the remaining waste in the tanks not covered under phase one, the waste in the open barge tanks, waste in the small containers and drums, as well as waste in some of the equipment. The LDEQ anticipates that there will not be any lag time between the two phases.

5. Where can I get additional information?

A repository of site information that contains copies of documents related to the remediation project will be set up in the Morgan City Public Library and the Saint Mary Parish Library. Monthly progress reports submitted by the contractors will be available at this repository. The LDEQ will also provide a link on its webpage (under the Remediation Services Division tab) to documents related to the remedial activity. The site's team leader will be available to answer questions regarding the progress reports.

6. What is the name, phone number and email address of the designated person who is authorized to receive and respond to complaints?

The site's team leader will have the responsibility of receiving and, with the consent of LDEQ's management, responding to technical complaints. The responsibility for responding to other types of complaints will be decided by the Department's management. Currently, the site's Team Leader's name, phone number and email are as follows:

Name: Vicki Hadwin
Phone: 225-219-3208
Email: vicki.hadwin@la.gov

The LDEQ will also provide oversight of the remediation activities. As a part of meeting this obligation, the Department will have an office equipped with a phone number in one of the trailers to be placed on site. This phone number will be made available to the public before the initiation of the remedial action.

6. LDEQ must require that the plan include provision for reporting to the agency on all issues and concerns related to the remedial activity that are raised by the public.

The LDEQ can receive complaints in any format, but facilitate inclusion in Department's file system, the complaint needs to be in a written format that includes the Agency Interest (A.I) number 5414 and be submitted to:

Keith Casanova, Administrator
Remediation Services Division
P.O. Box 4314
Baton Rouge, LA 70821-4314.