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Our ref: 11215131-Poulos-20

October 25, 2022

Ms. Lauren Poulos
Remedial Project Manager
United States Environmental Protection Agency (EPA), Superfund Division (6SF-RA)
1201 Elm Street, Suite 500
Dallas, Texas 75270 2102

Southern Impoundment Supporting Deliverables
San Jacinto River Waste Pits Site
Harris County, Texas
EPA Region 6, CERCLA Docket No. 06-05-21 for Remedial Action

Dear Ms. Poulos:

GHD Services Inc. (GHD), on behalf of International Paper Company (Respondent), submits to the United States Environmental Protection Agency (EPA) this Transportation and Off-Site Disposal Plan (TODP). This TODP is being submitted with the requirement that it be updated and resubmitted, following selection of the Remedial Contractor (RC) for the Southern Impoundment Remedial Action (RA), in order to incorporate the RC's input into the TODP.

Should you have any questions or require additional information regarding this submittal, please contact GHD at (713) 734-3090.

Regards,

Charles Munce
MidCon Region Market Leader

+1 832 380-7655
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CM/kdn/20

Encl: Attachment 1 - Transportation and Off-Site Disposal Plan

Copy to: Robert Appelt, EPA
Katie Delbecq, Texas Commission on Environmental Quality (TCEQ)
Brent Sasser, IPC

100028299

Attachments

Attachment 1

Transportation and Off-Site Disposal Plan

Transportation and Off-Site Disposal Plan - Southern Impoundment

San Jacinto River Waste Pits Superfund Site

Harris County, Texas

International Paper Company

October 25, 2022

→ The Power of Commitment

Contents

1. Introduction **1**
1.1 Relationship to Supporting Plans 1
2. Roles and Responsibilities **1**
3. Compliance with Off-Site Disposal Rule **2**
4. Waste Classification Procedures **2**
4.1 Waste Stream Categories and Disposal Options 3
4.2 Waste Sampling and Classification 4
5. On-Site Management and Loading **6**
5.1 Transportation Truck/Container Requirements 6
5.2 Truck Staging and Loading Requirements 6
5.2.1 Lining Trucks and Securing Loads 6
5.2.2 Control and Mitigation of Tracking Waste Beyond Work Areas 7
6. Transportation **7**
6.1 Transportation Routes to Disposal Facilities 7
6.2 Work Site Entry and Egress Traffic Management 8
7. Document and Reporting **8**
7.1 Waste Profiles 8
7.2 Manifests 8
7.3 Waste Reporting 8
8. References **9**

Figure index

Figure 1 Waste Confirmation Sampling Grid
Figure 2 Transportation Routes from the Southern Impoundment to Interstate 10
Figure 3 Transportation Route to the Republic Golden Triangle Landfill
Figure 4 Transpiration Route to the Waste Connections Seabreeze Landfill

1. Introduction

This Transportation and Off-Site Disposal Plan (TODP) was prepared by GHD Services Inc. (GHD), on behalf of International Paper Company (IPC) for the Southern Impoundment of the San Jacinto River Waste Pits Superfund Site in Harris County, Texas (Work Site). This TODP is being submitted on behalf of IPC to meet requirements contained in the August 5, 2021, Unilateral Administrative Order (UAO; EPA, 2021).

GHD has been selected as the Remedial Contractor (RC) for the Southern Impoundment Remedial Action (RA). This TODP is an updated version of a TODP included as one of the supporting deliverables with respect to the Final 100% Remedial Design - Southern Impoundment (Amended April 2021) (GHD, 2021a) It was later revised on November 26, 2021 and June 17, 2022 pursuant to the Southern Impoundment Revised Remedial Action Work Plan (Revised RAWP), submitted to the EPA on November 26, 2021 (GHD, 2021b). It is being further revised pursuant to the Revised RAWP, based on the selection of GHD as the RC.

This TODP provides the procedures for management and loading of impacted material at the Work Site for the Southern Impoundment RA (Work Site) which will be disposed of off-site, the transportation routes for off-site shipments from the Work Site, and measures to be implemented, if needed, to protect communities that may be affected by the shipments. It also addresses the management of other wastes generated during implementation of the Southern Impoundment RA (collectively, Wastes). This version of the TODP includes updates provided by the RC and the disposal companies regarding their responsibilities under this plan.[1] This TOPD will be revised and submitted to EPA for review and approval if changes to it are required during implementation of the RA, such as changes to truck haul routes, access to and from the Work Site, and any other necessary changes.

1.1 Relationship to Supporting Plans

The TODP should be considered in combination with certain other supporting plans identified in the approved Final 100% RD Remedial Design (Amended June 2022) (GHD, 2022), as those plans have been updated or approved for use as part of the Southern Impoundment RA. The Construction Quality Assurance/Quality Control Plan (CQA/QCP) describes the procedures to verify that the excavation objectives are achieved during implementation. The Site-Wide Monitoring Plan (SWMP) describes the procedures for monitoring to prevent the potential spread of dust generated during construction and monitoring of the best management practices (BMPs) with respect to stormwater. The field and analytical quality procedures are described in the Quality Assurance Project Plan (QAPP). Field Sampling Plan (FSP) provides the procedures for sampling the treated contact water from the wastewater treatment system, impacted material for purposes of waste confirmation, and the imported backfill that will be used to fill excavations during implementation of the Southern Impoundment RA.

2. Roles and Responsibilities

Roles and responsibilities of those involved in activities addressed by this TODP include the following:

– ***Generator*** - IPC will be the generator of the Wastes. The Generator will be responsible for characterizing the waste and signing the waste profiles and the manifests. The Generator's signatory authority may be delegated to another representative at the Work Site.

– ***Engineer*** - GHD will serve as the Engineer. The Engineer will be responsible for inspecting and documenting the work for conformance with the specifications and other contract documents, including the loading and

[1] With regard to this requirement, please see the cover letter submitting the Revised RAWP dated November 26, 2021.

transportation of impacted materials for disposal off-site. This role may include a waste coordinator to track waste-related activities and prepare the documentation of the kind described in Section 7.0.

- ***Remedial Contractor*** - GHD's Construction Group will serve as the RC. The RC will be responsible for managing and loading the impacted materials for transportation to the Disposal Facility and management and disposal of other wastes generated during the Southern Impoundment RA.
- ***Transporter*** - The Transporter(s) will have responsibility for transporting waste to the selected Disposal Facility(ies). The Transporter(s) will sign the waste manifests as the Transporter. The Transporter(s) on the project has not yet been selected.
- ***Disposal Facility*** - The Disposal Facility(ies) will be responsible for approving waste profiles, receiving the waste shipments, documenting the weight/volume, and disposing of the Wastes properly according to its permits. The Disposal Facility(ies) will sign the waste manifests at the Disposal Facility and return the completed manifests to the Generator. The Golden Triangle Landfill in Beaumont Texas and the Seabreeze Landfill in Angleton, Texas have been selected as Disposal Facilities.

3. Compliance with Off-Site Disposal Rule

Section 121(d)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) applies to any CERCLA response action involving the off-site transfer of any hazardous substance, pollutant, or contaminant (CERCLA wastes). That section requires that CERCLA wastes may only be placed in a facility operating in compliance with Resource Conservation and Recovery Act (RCRA) or other applicable Federal or State requirements. It further prohibits the transfer of CERCLA wastes to a land Disposal Facility that is releasing contaminants into the environment and requires that any releases from other waste management units must be controlled. These principles are interpreted in the Off-Site Rule (OSR), set forth in the National Contingency Plan (NCP), at 40 Code of Federal Regulations (CFR) 300.440.

The OSR establishes the criteria and procedures for determining whether facilities are acceptable for the receipt of CERCLA wastes from response actions authorized or funded under CERCLA. The OSR establishes compliance criteria and release criteria and establishes a process for determining whether facilities are acceptable based on those criteria. The OSR also establishes procedures for notification of unacceptability, reconsideration of unacceptability determinations, and re-evaluation of unacceptability determinations.

The SOW requires a prior determination that a proposed Disposal Facility is acceptable before shipping any hazardous substances, pollutants, or contaminants to it. Two Disposal Facilities have been identified to receive the Wastes from the Southern Impoundment of the San Jacinto River Waste Pits Superfund Site. The selected facilities are the Golden Triangle Landfill in Beaumont Texas operated by Republic Services, and the Seabreeze Landfill in Angleton, Texas operated by Waste Connections Inc. GHD, on behalf of IPC, contacted the EPA Region VI regional off-site contact to inquire about the status of each selected Disposal Facility. Confirmation that the selected Disposal Facilities are able to receive CERCLA waste was documented in email correspondence with the EPA Region 6 RCRA Enforcement Officer (Mr. Wilkin Shannon) dated June 9, 2022 and further confirmed in email correspondence dated October 24, 2022.

4. Waste Classification Procedures

The Southern Impoundment 100% RD (Amended April 2021) described the waste determination process for Impacted Material (as defined below in Section 4.1). To supplement the existing waste characterization data, six additional discrete samples for waste characterization were collected during the PC-FSE within the four proposed excavation areas. These locations targeted intervals of known high dioxins and furans concentrations. These samples were

analyzed for the four RCRA hazardous waste characteristics per EPA required test methodology in 40 CFR Part 261. The results indicated that the waste is non-hazardous and can be disposed off-site at a subtitle D landfill.

Additionally, composite samples of the PC-FSE investigation-derived waste (IDW) were collected, in accordance with Texas non-hazardous industrial solid waste regulations (Texas Administrative Code [TAC] 335.505-506) to further refine the non-hazardous classification (Class 1 or Class 2) of that material. One composite sample was collected from the IDW from each of the four excavation areas and analyzed for the Class 2 disposal parameters including Toxicity Characteristic Leaching Procedure (TCLP), in accordance with Texas non-hazardous industrial solid waste regulations (TAC 335.505-506). The results indicate that the IDW is non-hazardous and below the Class 1 disposal parameter thresholds.

Based on the previous waste characterization sampling outlined in the Southern Impoundment 100% RD (Amended April 2021) and the results from the PC-FSE, which were included in the June 2, 2022 Addendum to the 100% RD (100% RD Addendum) (GHD, 2022) and approved by EPA with comments on August 11, 2022, the RA impacted soil will be managed as a Texas Class 2 non-hazardous waste.

As detailed in the 100% RD Addendum, the RA will require excavation of approximately 92,000 cubic yards (cy) of soil, of which approximately 28,800 cy would be overburden that will be temporarily stockpiled and then used as backfill and an estimated 63,200 cy of impacted soil will be transported off-site for disposal at a Subtitle D landfill.

The waste characterization information described above was submitted to the two selected Disposal Facilities as the basis for developing the nonhazardous Class 2 waste profiles described in Section 4.1. In addition, a sampling plan to further confirm these profiles was prepared in consultation with the disposal companies and will be followed to confirm that the impacted soil is Class 2 non-hazardous waste. This confirmation sampling plan is detailed in Section 4.2.

4.1 Waste Stream Categories and Disposal Options

The following section describes the expected waste categories to be generated during the Southern Impoundment RA, and the profiles that have been developed and approved by the two selected Disposal Facilities:

Impacted Material (Soil, Debris and Vegetation)

– Waste Connections Seabreeze Landfill Non-Hazardous Industrial Class 2 Waste Profile No. SB-22-217.
– Republic Golden Triangle Landfill Non-Hazardous Industrial Class 2 Waste Profile No. 5120226963.

These profiles are for the impacted soil that will be excavated and transported for off-site disposal. The impacted soil will be solidified, as necessary, to remove free liquids prior to disposal. Any impacted debris and vegetation that is generated will also be disposed of under these profiles. Impacted debris includes materials that may have contacted the waste including, but not limited to, miscellaneous wood, concrete, metal, trash discarded treatment filters, and discarded personal protective equipment (PPE).

Non-Impacted Debris and Vegetation

– Waste Connections Seabreeze Landfill Profile No. SB-22-199.
– Republic Golden Triangle Landfill Profile No. 5120226948.

These profiles were established for non-impacted debris and vegetation. IPC has elected to classify this material as Class 2 nonhazardous waste so material under this profile will be managed and disposed of in the same manner as the potentially impacted soil, debris and vegetation described above. IPC may elect to dispose of any or all of the vegetation and debris as potentially impacted material rather than segregate and dispose under these profiles for non-impacted material.

Asbestos

– Republic Golden Triangle No. 51202213618.

Approximately 110 square feet of asbestos was identified in the floor tiles of the building to be demolished. The asbestos will be properly removed, managed, and containerized for disposal under this profile.

Weathered Wood

– Republic Golden Triangle No. 51202214616

Utility poles will require removal for excavation along Market Street. The weathered wood profile is for disposal of the utility poles once removed.

Water Treatment System Residuals

– **Spent Media from Water Treatment System (WTS) -** The spent carbon and other spent media from the WTS may be transferred to a vendor for recycling or regeneration. If the spent carbon or other spent media cannot be recycled/regenerated for other uses, the material would be characterized and transported off-site for disposal. The media will need to be characterized at the time that it is generated but is expected to be a Class 2 non-hazardous waste.
– **WTS Influent and Effluent Tank Liners -** The liners from the Lake Tanks will need to be disposed of at the conclusion of each excavation season. The liner material will need to be characterized at the time that it is generated but is expected to be a Class 2 non-hazardous waste.
– **Solids in Lake Tanks -** Solids that collect in the Lake Tanks will need to be disposed of at the conclusion of each excavation season. The media will need to be characterized at the time that it is generated but is expected to be a Class 2 non-hazardous waste.
– **Chemical Sludge -** The contact water is expected to contain solids from the impacted soil in the excavation. It is anticipated that coagulants, organosulfides, and/or polymers will result in the precipitation of metals and removal of suspended solids. The resulting sludge will be withdrawn as the underflow of the inclined plate clarifier. The settled solids will be directed to sludge dewatering boxes where it is estimated that it will be gravity-thickened to a solids concentration of up to 6 to 8 percent (mass basis). Once dewatered, the sludge dewatering boxes will be trucked back to the dewatering areas for solidification and off-site disposal. It is expected that the material will be disposed of as Class 2 non-hazardous waste.
– **General Trash and Sanitary Sewage** - General trash and sanitary sewage will need to be handled through service companies that specialize and are licensed for these activities or through some other means adopted by the RC.

IPC will also properly classify and dispose of any other potential waste streams identified during the RA, as necessary. It is expected that if additional waste streams are identified, they will be disposed of at either the Waste Connections Seabreeze Landfill or the Republic Golden Triangle Landfill. Prior to shipping waste to any other off-site Disposal Facility, IPC will notify EPA and will provide documentation that the proposed facility is in compliance with the OSR.

4.2 Waste Sampling and Classification

There are approved profiles for several of the waste streams expected as part of the Southern Impoundment RA, including the Potentially Impacted Soil, Debris and Vegetation. IPC and the Engineer have worked with the selected Disposal Facilities and developed a sampling plan to confirm that the impacted soil generated throughout the removal area is consistent with the profiles that are developed.

The sampling plan divides the total area requiring removal and off-site disposition into twenty-six thiessen polygon areas contain between 1,100 cy and 3,000 cy of impacted soil to be removed, as shown on Figure 1. The profile confirmation procedures are as follows:

1. In advance of shipping material to the Disposal Facility, waste characterization samples will be collected from borings at the locations shown on Figure 1. Three borings will be installed in-situ within each grid area identified as A, B, and C on Figure 1. A sample from each boring will be obtained that represents the entire vertical profile

of material that will be removed for disposal. The three samples (A, B, & C) will then be homogenized into a single composite sample for each of the 26 grid areas.

2. The 26 composite samples will be analyzed for total petroleum hydrocarbons (TPH) and selected constituents included in Title 30 of the TAC Chapter 335, Subchapter R (Waste Classification) Appendix 1, Table 1 for Class 1 Non-Hazardous Industrial Waste using the following methods:
   a. TCLP Dioxins and Furans - EPA Methods 1311 (TCLP) and 1613B.
   b. TCLP Metals - EPA Methods 1311 and 6010C.
   c. TCLP Mercury - EPA Methods 1311 and 7470A.
   d. TPH - Texas Natural Resource Conservation Commission (TNRCC) Method 1005.
3. The analytical data from a grid area will then be provided to the selected Disposal Facility approximately 14 calendar days prior to shipping material from that grid area for disposal. The analytical data will be accompanied by a table comparing the results to the constituents and limits listed below.

Analyte	Units	Class I/Class II Limit (Based on TCLP analysis)
TCLP-Dioxins/Furans		
2,3,7,8-TCDD	mg/L	0.005
1,2,3,7,8-PeCDD	mg/L	0.01
1,2,3,4,7,8-HxCDD	mg/L	0.05
1,2,3,6,7,8-HxCDD	mg/L	0.05
1,2,3,7,8,9-HxCDD	mg/L	0.05
2,3,7,8-TCDF	mg/L	0.05
1,2,3,7,8-PeCDF	mg/L	0.10
2,3,4,7,8-PeCDF	mg/L	0.01
1,2,3,4,7,8-HxCDF	mg/L	0.05
1,2,3,6,7,8-HxCDF	mg/L	0.05
1,2,3,7,8,9-HxCDF	mg/L	0.05
TCLP-Metals		
Antimony	mg/L	1
Arsenic	mg/L	1.8
Barium	mg/L	100
Beryllium	mg/L	0.08
Cadmium	mg/L	0.5
Chromium	mg/L	5
Lead	mg/L	1.5
Mercury	mg/L	0.2
Nickel	mg/L	70
Selenium	mg/L	1
Silver	mg/L	5

Analyte	Units	Class I/Class II Limit (Based on TCLP analysis)
Total Petroleum Hydrocarbons		Class I/Class II Limit (Based on total analysis)
TPH	mg/kg	1,500
Notes: mg/L - milligrams per liter mg/kg - milligrams per kilogram		

1. Shipment of material will be allowed under the existing Non-Hazardous Class 2 Waste Profile for the material within any grid area where sample results are less than the concentrations in the table above and have been provided to the Disposal Facility.
2. If the result from a grid area exceeds any of the concentrations listed above, material from that grid area will not be shipped to the Disposal Facility until that material has been further characterized, and if necessary, a newly created waste profile for the material from that grid area has been approved by the Disposal Facility.

The applicable sampling and analytical methods are addressed in the FSP and in the QAPP.

Republic Services and Waste Connections were involved in the development of these profile confirmation sampling procedures and are in agreement with their adequacy for confirming the existing waste profiles for impacted soil.

5. On-Site Management and Loading

This section describes the procedures for on-site management of the waste, including the requirements and procedures for loading and securing the loads and control/mitigation of tracking any waste beyond the loading area and the Work Site.

5.1 Transportation Truck/Container Requirements

It is expected that impacted material will be loaded into trucks, such as 20-ton end dump trucks and will be transported to the off-site Disposal Facility via surface streets and highways. The material may be loaded into smaller trucks for transportation to the Disposal Facility or placed into roll-off containers that will be loaded onto trucks for transportation. The trucks and containers will be inspected as they arrive at the Work Site and must be in good shape, free of defects or damage/corrosion that could result is release of the contents. The truck beds and containers must have sturdy, fully intact, tarps with straps that are of sufficient size and strength to cover, secure and keep all loaded waste contained. Any truck that does not meet these requirements will not be used on the project.

5.2 Truck Staging and Loading Requirements

5.2.1 Lining Trucks and Securing Loads

The truck beds and containers will be lined with a minimum 4 mil thickness liner prior to placing any waste. Wastes placed in the trucks may not contain any free liquids. If free liquids are observed, the wastes will be dumped into a lined mixing pad on-site and reloaded after being solidified. After loading, tarps will be placed over the loads and secured prior to the truck leaving the Work Site.

5.2.2 Control and Mitigation of Tracking Waste Beyond Work Areas

An inspection/cleaning station will be established at a location by which all trucks will be required to pass before leaving the removal areas at the Work Site. The trucks will be cleaned at this location, as necessary, prior to allowing them to enter the Market Street private road and public roadways. The inspection/cleaning area will be constructed to allow cleaning of the trucks and containment of the soils and fluids that are generated. Cleaning techniques shall include dry decontamination methods, such as sweeping and/or vacuuming. If dry cleaning techniques are not effective, wet decontamination methods, such as pressure washing, will be implemented. A worker will be located at the inspection/cleaning station and designated to inspect the trucks before they can leave the Work Site. If any mud or waste is tracked beyond the limits of the Work Site, the tracked material will be cleaned up immediately.

6. Transportation

This section describes transportation requirements and provides maps showing the routes from the Work Site to the selected Disposal Facilities. The section also describes the safety procedures that will be followed to control access and egress to the Work Site by vehicles, including signage, and the use of flaggers.

6.1 Transportation Routes to Disposal Facilities

A majority of the waste generated on the project will be the impacted soil that will go off-site for disposal as Class 2 nonhazardous waste. The following two facilities have provided approval for acceptance of this waste.

– Republic Golden Triangle Landfill in Beaumont Texas.
– Waste Connections Seabreeze Environmental Landfill in Angleton Texas.

Figure 2 shows the route from the Southern Impoundment to Interstate-10 (I-10). Figure 3 shows the potential truck route eastbound on I-10 to the Republic Golden Triangle facility and Figure 4 shows the potential truck route westbound to the Waste Connections Landfill. These routes will be evaluated with the Transporter during the RA and adjustments will be made, as necessary, to provide efficient and safe transportation of the wastes from the Work Site to the facilities. The routes shown on Figures 2-4 assume no change in access to I-10 as a result of the Texas Department of Transportation (TxDOT) work, including the bridge replacement project.

There will be a strong emphasis during the project to maintain safety and minimize disturbance in the community as described below:

– The objective will be to use only well qualified transportation firms and drivers on the project. Transporters will be required to submit proof of the transporter's valid hauler registration and ensure that all vehicles utilized for transport of waste are properly registered, operated, and placarded (if necessary) in compliance with local, state, and federal requirements. Drivers will be required to provide proof of a valid driver's license and evidence of insurance.
– To the extent practicable, dedicated drivers will be used on the project.
– Prior to the first shipment of wastes to a Disposal Facility, representatives of the project team will drive the routes to the Disposal Facilities and make any adjustments to the route that are necessary to promote safety and minimize traffic disturbances, where feasible (e.g., avoid neighborhoods, high traffic areas, and busy commercial areas).
– Prior to the excavation work, the businesses along Market Street that may be affected by the truck traffic will be notified of the timing and the expected volume of truck traffic. There will also be communication with these businesses during the work if there is expected to be any appreciable modifications to the scheduled activities that could affect them.

– Consideration will be given to the periods during the day when waste is shipped and the spacing of the trucks to minimize disruption to the businesses along Market Street and communities through which the trucks will travel.

6.2 Work Site Entry and Egress Traffic Management

Trucks carrying the impacted soil to the Disposal Facilities will leave the Work Site through a designated entrance/exit that will be well maintained and marked. The trucks will travel on Market Street and around to Monmouth Street to access the frontage road to I-10 (either Eastbound or Westbound). Traffic will be directed with a combination of signage and flagging. A flagger will be situated at the exit from the Work Site to Market Street. The Transporter will be required to finalize the transportation routes and coordinate with the Texas Department of Transportation and local County representatives regarding permitting, signage, and to communicate the timing and the volume of truck traffic.

7. Document and Reporting

This section provides the documentation requirements for transportation and off-site disposal activities.

7.1 Waste Profiles

Waste Profiles have been developed as described in Section 4.1. Waste profiles will also be developed for any other waste streams that are identified during the RA. The waste profiles describe the waste and provide the Disposal Facility with the information it needs to ensure the waste can be managed at its facility under that profile. Waste profiles also include waste codes and other information consistent with RCRA (40 CFR Parts 261 and 268) and TAC Chapter 335, Subchapter R. Copies of the profiles will be maintained on-site and any changes to a profile will require the approval by both the Generator and the Disposal Facility, after which the profile will be updated to reflect the approved changes. Copies of the approved waste profiles can be provided to the EPA upon request.

7.2 Manifests

Based on the waste characterization samples collected to date, hazardous waste is not expected to be generated during the Southern Impoundment RA. In the unlikely event that hazardous waste is generated, as defined in 40 CFR Part 261, it will be managed and disposed of in accordance with RCRA regulations.

The Disposal Facilities utilize a non-hazardous waste manifest to track waste custody and quantities and to document that the waste was received and disposed of at the facility. The manifests will allow for the quantification of waste tonnage disposed throughout the project.

7.3 Waste Reporting

There is not expected to be any Hazardous or Texas Class I Industrial waste generated during the project. Therefore, there are not any requirements for an Annual Waste Summary (AWS) per 30 TAC §335.9(a)(2). However, all waste generated and shipped off-site will be closely tracked and reported as part of the project requirements. The waste tracking for each load transported off-site will include:

– Transporter Name.
– Date of Shipment.
– Load Number - Internal Sequential Load number.
– Truck Number - Number that uniquely identifies the truck, such as the license number.
– Manifest/Shipping Document Tracking Number - pre-printed number on waste documentation.
– Waste Type - Either Waste Profile Number or other unique waste identifier.

- Disposal Facility.
- Quantity - Typically weight, but some waste may be tracked as volume.
- Date Received at Disposal Facility.

8. References

- GHD, 2021a. *Final 100% Remedial Design-Southern Impoundment (Amended April 2021)*, San Jacinto River Waste Pits Superfund Site. Prepared for International Paper Company and U.S. Environmental Protection Agency, Region 6. April 19, 2021.
- GHD, 2021b. *Remedial Action Work Plan - Southern Impoundment Revision 2*, San Jacinto River Waste Pits Superfund Site. Prepared for International Paper Company and U.S. Environmental Protection Agency, Region 6. November 26, 2021.
- EPA, 2021. Unilateral Administrative Order for the Remedial Action of the Southern Impoundment. U.S. EPA Region 6, CERCLA Docket No. 06-05-21. In the matter of: San Jacinto River Waste Pits Superfund Site, Harris County, Texas, Respondent. August 2021.
- GHD, 2022. *100% Remedial Design Addendum*, San Jacinto River Waste Pits Superfund Site. Prepared for International Paper Company and U.S. Environmental Protection Agency, Region 6. June 2, 2022.

Paper Size ANSI A

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Feet

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane Texas South Central FIPS 4204 Feet

N

GHD

SAN JACINTO RIVER WASTE PITS
HARRIS COUNTY, TEXAS
SOUTHERN IMPOUNDMENT
TRANSPORTATION AND OFFSITE DISPOSAL PLAN

WASTE CONFIRMATION SAMPLING LOCATIONS

Project No. **11215131**
Date **Oct 7, 2022**

FIGURE 1

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Data source: Google Earth Basemap, Imagery Date 11/16/2020

Paper Size ANSI B

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Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane Texas South Central FIPS 4204 Feet

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GHD

SAN JACINTO RIVER WASTE PITS
HARRIS COUNTY, TEXAS
SOUTHERN IMPOUNDMENT
TRANSPORTATION AND OFFSITE DISPOSAL PLAN

TRANSPORTATION ROUTES FROM THE SOUTHERN IMPOUNDMENT TO INTERSTATE-10

Project No. 11215131
Revision No. -
Date Oct 7, 2022

FIGURE 2

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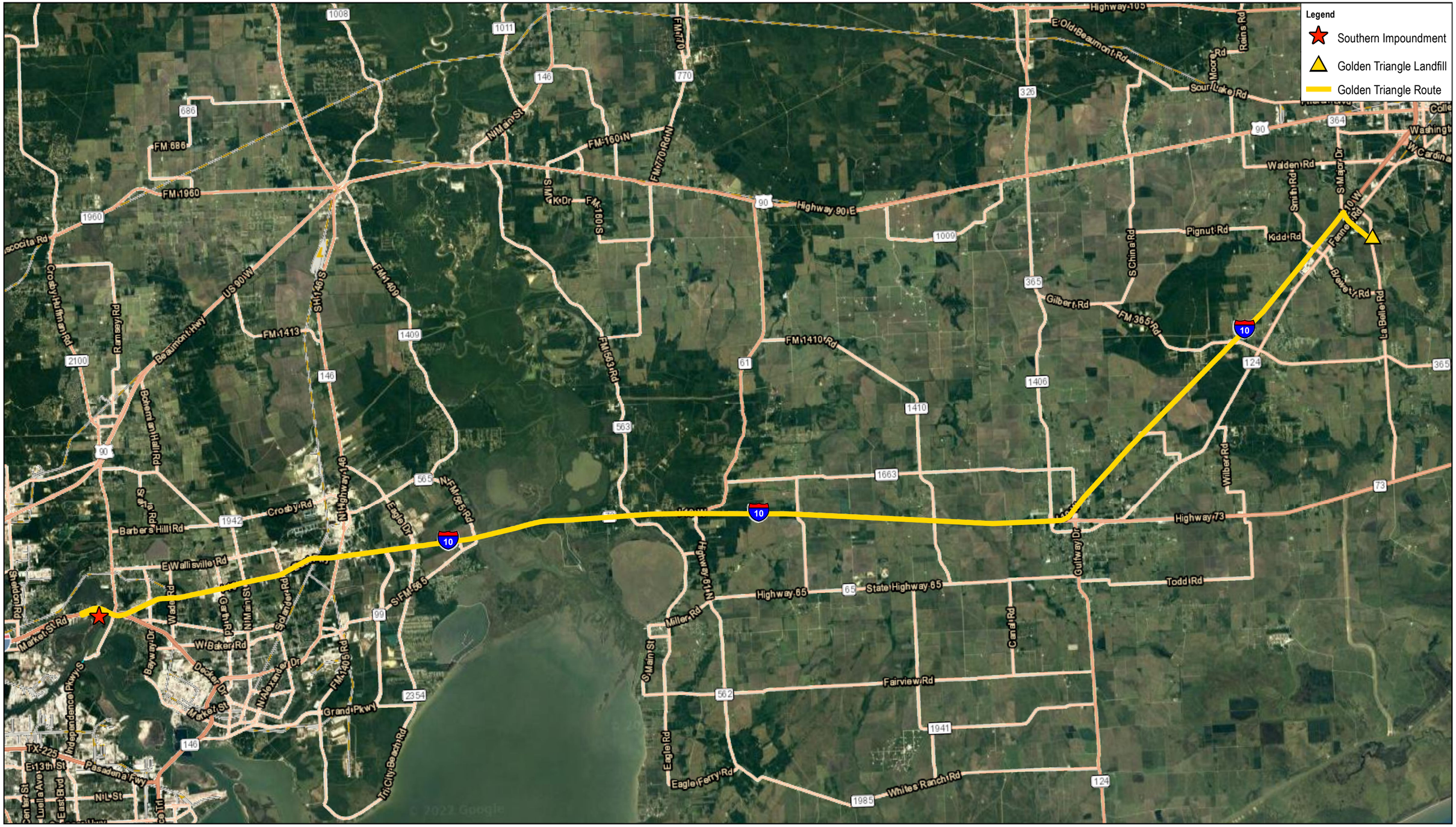
Data source: Google Earth Basemap and Esri, HERE, Garmin, (c) OpenStreetMap contributors.



Notes:
The proposed route is subject to change based on traffic conditions at the time of RA Construction and following Remedial Contractor selection and coordination.

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Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane Texas South Central FIPS 4204 Feet

GHD

SAN JACINTO RIVER WASTE PITS
HARRIS COUNTY, TEXAS
SOUTHERN IMPOUNDMENT
TRANSPORTATION AND OFFSITE DISPOSAL PLAN

TRANSPORTATION ROUTE TO THE REPUBLIC SERVICES GOLDEN TRIANGLE LANDFILL

Project No. **11215131**
Revision No. **-**
Date **Oct 7, 2022**

FIGURE 3

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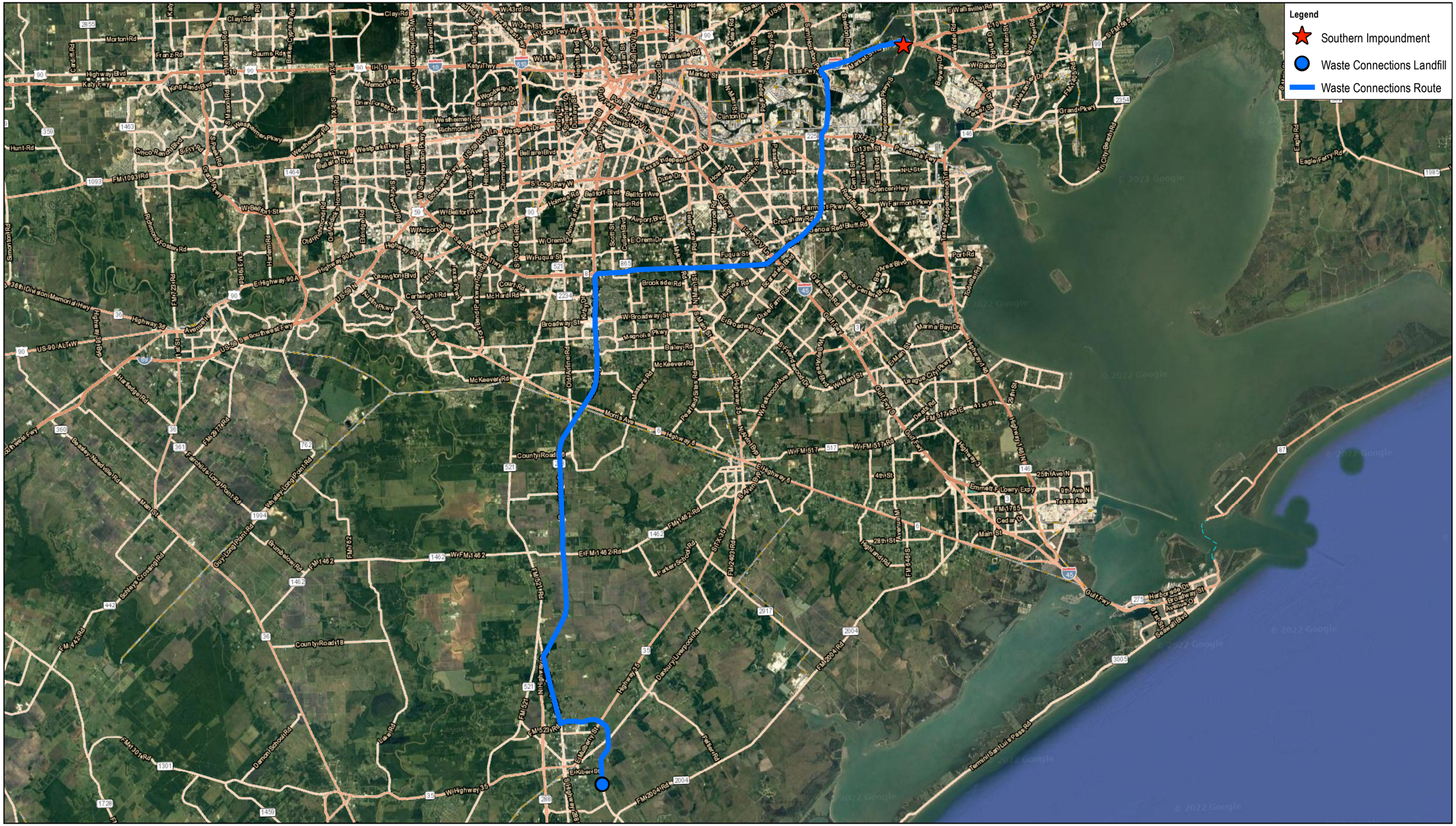
Data source: Google Earth Basemap and Esri, HERE, Garmin, (c) OpenStreetMap contributors.



Notes:
The proposed route is subject to change based on traffic conditions at the time of RA Construction and following Remedial Contractor selection and coordination.

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0 1.5 3 4.5 6
Miles

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane Texas South Central FIPS 4204 Feet

N

GHD

SAN JACINTO RIVER WASTE PITS
HARRIS COUNTY, TEXAS
SOUTHERN IMPOUNDMENT
TRANSPORTATION AND OFFSITE DISPOSAL PLAN

TRANSPORTATION ROUTE TO THE WASTE CONNECTIONS SEABREEZE LANDFILL

Project No. **11215131**
Revision No. **-**
Date **Oct 7, 2022**

FIGURE 4

Q:\GIS\PROJECTS\11215000s\11215131\Transportation and Offsite Disposal Plan\11215131_202206_TODP_GIS004.mxd

Data source: Google Earth Basemap and Esri, HERE, Garmin, (c) OpenStreetMap contributors.