UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 6, 2023

Charles W. Munce, P.E.
Project Coordinator
GHD Services Inc.
11451 Katy Freeway, Suite 400
Houston, Texas 77079

RE: Southern Impoundment Remedial Action Updated Supporting Deliverables Following Remedial Contractor Selection
San Jacinto River Waste Pits Superfund Site
Unilateral Administrative Order CERCLA Docket No. 06-05-21

Dear Mr. Munce,

The Environmental Protection Agency (EPA) has received and reviewed the San Jacinto River Waste Pits Superfund Site Southern Impoundment Updated Supporting Deliverables following Remedial Contractor Selection: Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), Emergency Response Plan (ERP), Transportation and Off-Site Disposal Plan (TODP), Site-Wide Monitoring Plan (SWMP), and Health and Safety Plan (HASP). These Supporting Deliverables were submitted on October 25, 2022, pursuant to the Unilateral Administrative Order (UAO) CERCLA Docket No. 06-05-21 for EPA review and approval.

The EPA approves the Supporting Deliverables with the modifications listed below, with the exception of the HASP, which EPA does not approve but reviews to ensure that all necessary elements are included and that the plan provides for the protection of human health and the environment. Pursuant to ¶ 5.6(a)(2) of the Statement of Work (SOW) (Approval of Deliverables – Initial Submissions), EPA may modify an initial submission to cure deficiencies in the submission if EPA determines that disapproving the submission and awaiting a resubmission would cause substantial disruption to the Work. In light of the limited season for site construction activities, EPA has determined that the time necessary to disapprove the submittal and await resubmission would cause substantial disruption to the Work. Based on that determination, EPA approves the Supporting Deliverables as modified below. Future versions of these plans will include these modifications.

General

1. Remove all statements in the Supporting Deliverables, including footnotes in Design Drawings, that reference that the plan will be updated and resubmitted following the selection of the Remedial Contractor (RC) for the Southern Impoundment Remedial Action (RA) as the RC has been selected. Instead, include a statement indicating that GHD has been selected as the RC for the project as of October 10, 2022.

Field Sampling Plan

2. **Section 4.2** – Add the following to the last paragraph after the second sentence: "No modifications to the design, operating procedures, or treatment rate will be made without prior notification and approval of the EPA, including changes to discharge type."

3. As discussed via email on November 17, 2022, any VOC soil samples should be taken as discrete samples (not composite).

4. As a modification to the approach proposed, 4-ounce jars with with TeflonTM-lined lids will be used for total petroleum hydrocarbon (TPH) samples as discussed with GHD in meetings as well as via email correspondences from November 22 and 23, 2022. The analytical method referenced in the FSP has specific requirements for sample collection, volume requirements, field preservation, and laboratory preservation prior to analysis. If existing data or knowledge can be used to document that no hydrocarbons are present between nC6 and nC12 ranges, then the samples can be collected using the bulk sampling technique (i.e., the sample is transferred from the medium into a 4-ounce jar with a TeflonTM-lined lid filling the sample container as full as possible to minimize the head space). The data GHD has provided for justification via email on November 22, 2022, shows that hydrocarbons are present in that range (albeit at low concentrations), but as the current sample effort is being collected for waste characterization and not site assessment, EPA is comfortable sampling as proposed, as long as a 4-ounce jar with a TeflonTM-lined lid is used and little to no headspace is allowed in each container, as described above. The result should be a representative sample of the waste for disposal at the facility. Document and integrate this change into the existing approved FSP so that it may be referenced moving forward and confirm that 4-ounce jars with TeflonTM-lined lids will be used.

5. **Table 2.1:** The table notes have two instances of Note 4 which appear to refer to Dioxins/Furans and Total Petroleum Hydrocarbons analyses, respectively. Change the second foot note to "Note 5."

6. **Section 2.3 Sample Analyses:** Include the list of other analyses of off-site imported fill soil samples that will be conducted (e.g. particle size, organic matter, pH) as designated in Section 31 23 23 Fill Part 1 General from the 100% Remedial Design Addendum Technical Specifications and reference the relevant Technical Specifications.

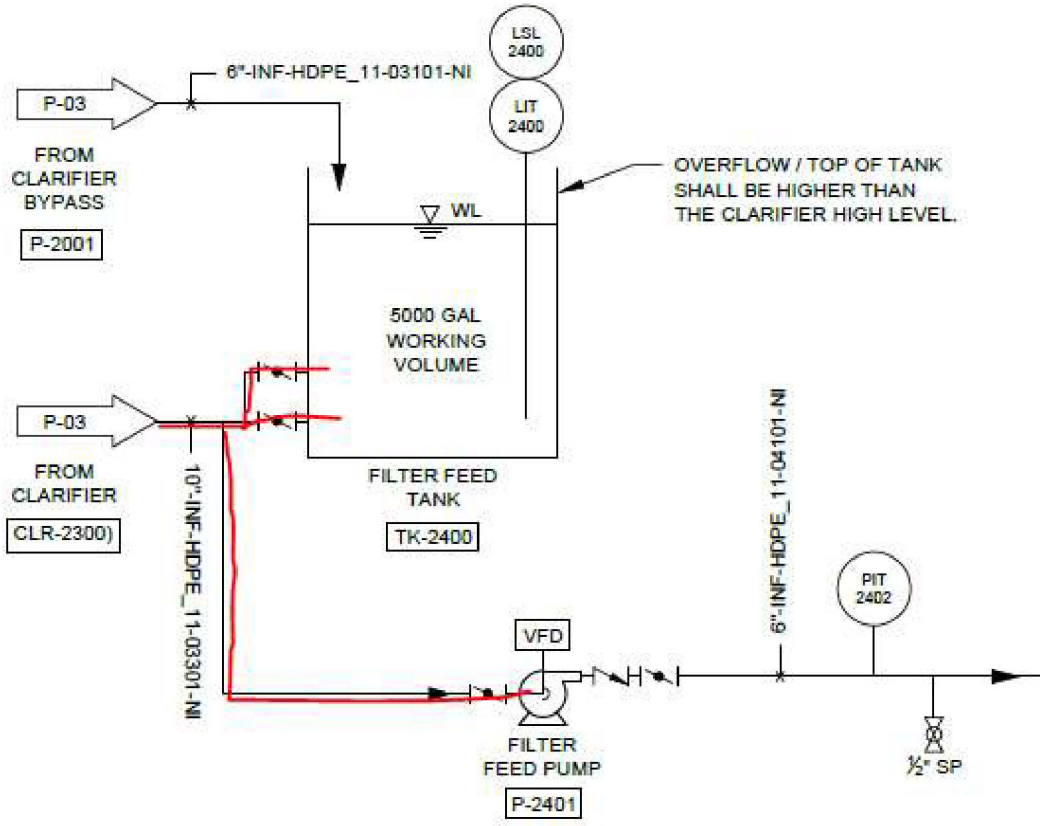
7. **Section 3.2 Sampling Analysis:** Change the wording in the second paragraph, second sentence to read "If the result from a grid area exceeds any of the limits listed in Table 3.2, material from that grid area will not be shipped to the Disposal Facility, and EPA will be notified and coordinated with to develop an approach to further characterize that material. Once that material has been further characterized, and if necessary, a newly created waste profile for the material from that grid area approved by the Disposal

Facility, the material will be shipped to the Disposal Facility." See email correspondence from November 17, 2022, for more information.

8. **Appendix A, Water Treatment System Design Drawings:** Replace the draft versions of P-02, P-03, P-04, and P-05 with the P.E. signed and sealed versions that were included in Appendix D of the Southern Impoundment Final 100% Remedial Design Addendum.

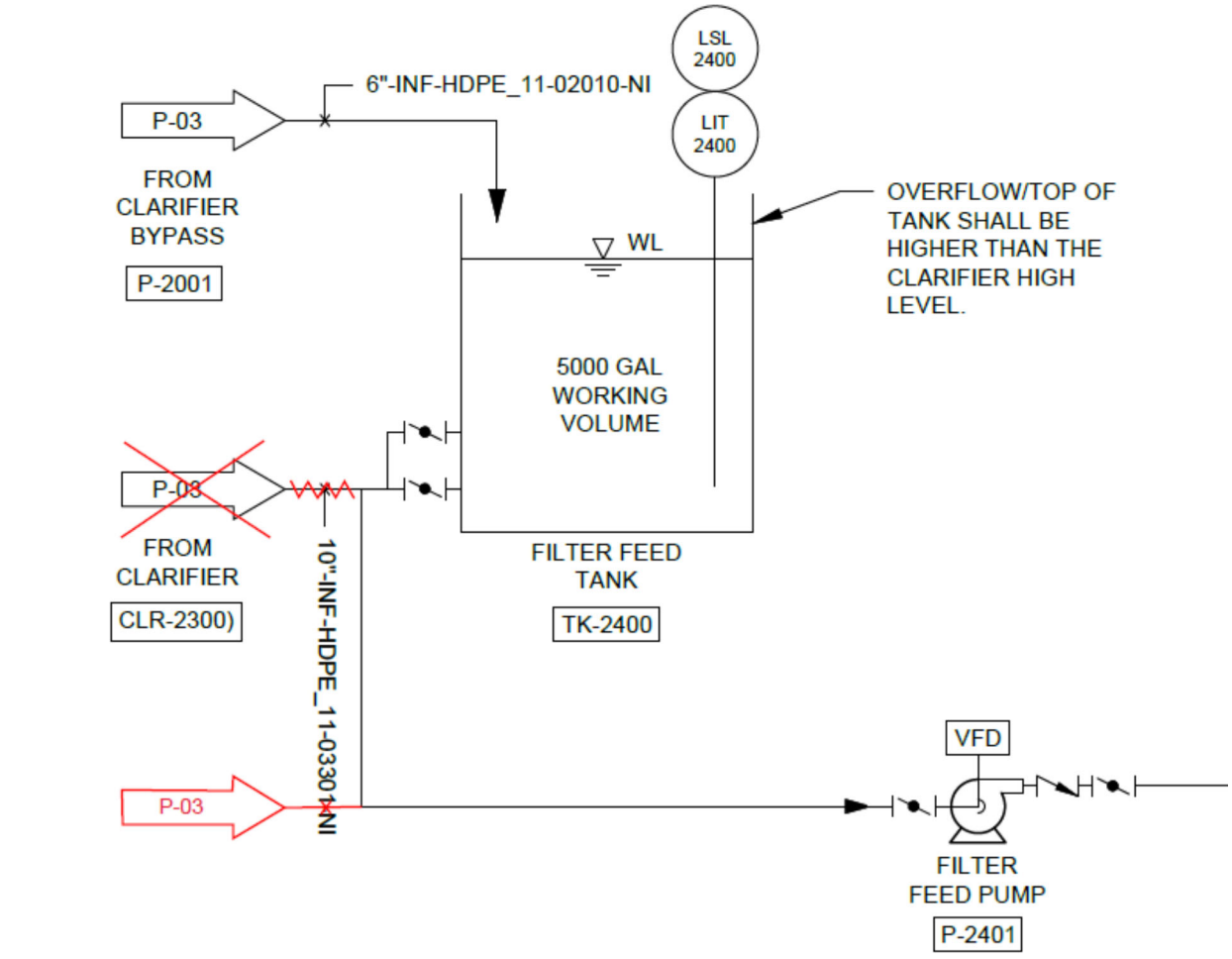
9. **Appendix A, Water Treatment System P&ID:** In the Water Treatment System P&ID, notes 1 and 2 state the P&IDs are conceptual, to be finalized by the contractor, and the treatment system design is preliminary and subject to change. Remove these statements as these plans and design should be considered final.

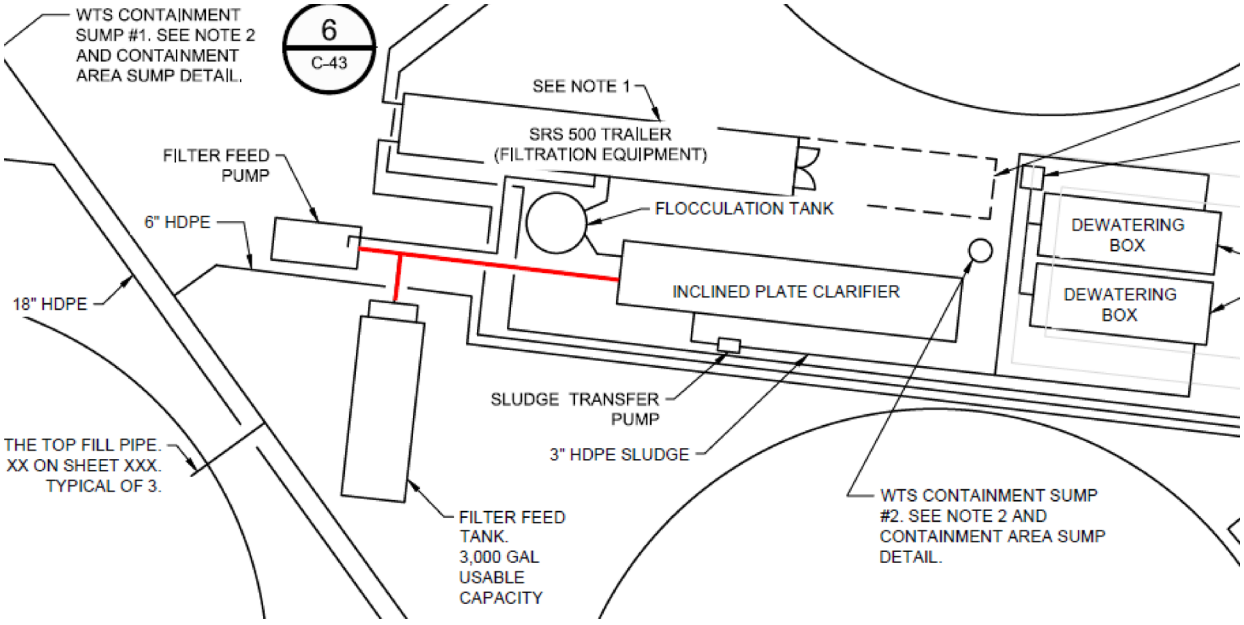
10. **Water Treatment System P&ID (3 OF 4):** With respect to the P-03 from the clarifier portion of the water treatment system, there does not appear to be a direct line from the filter feed tank to the filter feed pump. See the image below for reference, and include the updated two graphics below for clarification in the FSP.



Upon email conversation with GHD from December 19, 2022, EPA understands that the filter feed tank is included in the temporary water treatment system design to act as a buffer between the clarifier and the filter feed pump to modulate the flow to the filter feed pump. The filter feed tank will have two valves that allow bidirectional flow, allowing water to enter the tank from the clarifier and allowing water to exit the tank to send water to the filter feed pump. The design assumes a FRAC tank will be used which has limited connection sizes and two connections are needed for flow requirements. The filter feed tank will be off to the side of a direct line between the clarifier and the filter feed pump. The filter feed tank is included in the design for sequencing of operations, with high and low level sensors that will facilitate stopping and starting of the filter feed pump. Under normal operations, water would gravity flow from the clarifier to the filter feed pump, but there may be times when the flow rates don't match so water would be directed to the filter feed tank to modulate that flow.

The snipping below shows a modification to the process flow diagram from Drawing P-04 that more clearly shows how flow would go directly from the clarifier to the filter feed pump, with a line teed off to the filter feed tank, whereby water could be directed to the filter feed tank when the filter feed pump cannot keep up or is not operating. As the water rises within the filter feed tank, the sensor in the filter feed tank would communicate with the filter feed pump to turn back on. It should be noted that the system is gravity fed from the clarifier, hence the note pointing to the filter feed tank that the "overflow/top of tank shall be higher than the clarifier high level". The second snipping comes from Drawing P-08 and shows the direct line between the clarifier and the filter feed pump, with a line teed off to the filter feed tank off to the side. This clearly shows the direct line between the clarifier and filter feed pump.





Please include these updated graphics for clarification in the FSP.

Construction Stormwater Pollution Prevention Plan (SWPPP)

11. **General:** Include a map as per Part III Section F.1.g. of the General Permit requirements, which state that the SWPPP should have a detailed site map (or maps) indicating drainage patterns and slopes, areas where soil disturbance will occur, locations of controls or buffers, locations where stabilization practices will be needed, surface water features or wetlands, and other features.

12. **Section 7.2 Erosion and Sediment Control:** The first paragraph states that stormwater will be managed, to the extent practicable, to divert it from open excavations and refers to the proposed structural BMPs in Appendix H. However, Appendix H only shows silt fences, straw bale check dams, and turbidity curtains, but no mechanisms for directing stormwater away from open excavations. After conversations with GHD, EPA understands that diversion berms will be utilized to divert stormwater away from open excavations. Add this detail to Section 7.2. Also, in the second bullet point, change the first sentence to read as follows "During construction, if dewatering is required, non-contact sediment laden water will be discharged through sediment barriers and filters. All contact water pumped and/or dewatered from excavations will be routed through the water treatment system prior to discharge."

13. **Section 7.3.2 Concrete Washouts:** This section cites Sections II.E.1-3 of the General Permit, but the relevant requirements for concrete truck washouts are located in Part V, Sections A-E. Please correct this citation. Note that Section E also requires the location of concrete washout area(s) on the SWPPP site map (which is not included in the current draft). Include locations of concrete washout area(s) on the SWPPP site map (see comment 11 above for more information).

14. **Section 7.4 Stabilization Practices:** Native and local ecotype seeds should be strongly considered for use when reseeding vegetation following excavation.

15. **Appendix H, Erosion and Sedimentation Control Plan and Details:** Replace the draft versions of Drawings C-04 and C-05 with the P.E. signed and sealed versions that were included in Appendix D of the Southern Impoundment Final 100% Remedial Design Addendum.

Quality Assurance Project Plan

16. **Table 1:** In the Waste Confirmation section, analysis for "Metals" is indicated, but should read "TCLP Metals" consistent with the FSP Table 3.2. Please update the Table accordingly.

Emergency Response Plan

17. Include PCBs as a COC for the site in all response plans.

18. **Section 3.2 Release Prevention Measures:** The fifth bullet, last sentence states that a spill response contractor will be contracted to clean up larger spills or releases if necessary. EPA understands that a spill contractor has already been identified by GHD.

Identify the spill contractor and include the spill contractor's contact information in the plan.

19. **Section 3.2.2 Non-Emergency Conditions (Exceedance of a Reportable Quantity):** First paragraph, last sentence - define the acronym, SOW, the first time it's used in the document to avoid confusion.

20. Second paragraph - the reportable quantity list references the 30 Texas Administrative Code (TAC) Chapter 327.4 and is subject to 30 TAC Chapter 327.3 relating to notification requirements. Include the table with reportable quantity list and notification requirements in the ERP for easier reference for the reader.

Transportation and Off-Site Disposal Plan

21. **Section 4.2 Waste Sampling and Classification:** Note 2 of the table states that if the result from a grid area exceeds any of the listed concentration limits, further characterization will be done. Should any result from a sampling grid area exceed the concentration limits listed, EPA will be coordinated with regarding further characterization. Please see comment 7 above for more information.

Thank you for coordinating, and please contact me with any questions at poulos.lauren@epa.gov or 214-665-8371.

Sincerely,

LAUREN POULOS

Digitally signed by LAUREN POULOS
Date: 2023.01.06 16:40:11 -06'00'

Lauren Poulos
Remedial Project Manager

Cc: Wells Richard, GHD
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