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June 02, 2022

**Ms. Lauren Poulos**  
**Remedial Project Manager**  
**United States Environmental Protection Agency (EPA), Superfund Division (6SF-RA)**  
**1201 Elm Street, Suite 500**  
**Dallas, Texas 75202 2102**

**Addendum to the Final 100% Remedial Design (Amended April 2021)**  
**Southern Impoundment**  
**San Jacinto River Waste Pits Site**  
**Harris County, Texas**  
**EPA Region 6, CERCLA Docket No. 06-02-18 for Remedial Design**

Dear Ms. Poulos:

GHD Services Inc. (GHD), on behalf of International Paper Company (Respondent), submits to the United States Environmental Protection Agency (EPA) this Addendum to the Final 100% Remedial Design (Amended April 2021<sup>1</sup>) for the Southern Impoundment (100% Remedial Design [RD] Addendum) of the San Jacinto River Waste Pits Site in Harris County, Texas (Site). This 100% RD Addendum was prepared pursuant to the requirements of the Unilateral Administrative Order (UAO) for Remedial Action (RA) of the Southern Impoundment, EPA Region 6, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Docket No. 06-05-21 (Order<sup>2</sup>).

This 100% RD Addendum was prepared to incorporate additional data collected as part of the Pre-Construction Field Sampling Event (PC-FSE), which was completed in accordance with Section 3.1 of the Statement of Work attached to the Order and the approved Pre-Construction Field Sampling Plan. This 100% RD Addendum updates only those sections of the Southern Impoundment 100% RD that require modification following the PC-FSE.

Data from the PC-FSE significantly changed the extent and volume of material to be removed during RA Construction. The excavation volumes within each of the four excavation areas of the Southern Impoundment expanded vertically and horizontally, increasing the excavation volume by almost 100%.

Additionally, the Respondent will now utilize batch treatment and discharge of wastewater which will require containerizing the treated effluent in a system of aboveground storage tanks and the collection and submission of effluent samples for analysis under expedited turnaround time. Treating and discharging water in a batch fashion will require additional effluent tanks to store excess water during potential recirculation but will ensure that the treated effluent meets applicable discharge limits prior to discharge. These additional effluent tanks were not included in the Final 100% Remedial Design (Amended April 2021) but have been incorporated into the updated design drawings and specifications included in this 100% RD Addendum submittal.

<sup>1</sup> GHD, 2021. *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.

<sup>2</sup> EPA, 2021. *Unilateral Administrative Order for Remedial Action*. U.S. EPA Region 6, CERCLA Docket. No. 06 05 21. In the matter of: San Jacinto Waste Pits Superfund Site Southern Impoundment, Harris County, Texas. International Paper Company, Respondent. August 2021.

As approved in the 100% RD and the revised Remedial Action Work Plan (RAWP<sup>3</sup>), RA Construction will be completed from November through April, outside of hurricane season. Following selection of a remedial contractor (RC) and in accordance with the RAWP, the RC will provide a RA Construction schedule within 30 days after EPA is notified that a RC has been selected. Due to the increased volume of material for excavation, as well as construction of water treatment system effluent tanks to facilitate batch discharge of treated effluent, it is expected that RA Construction will now extend over two working seasons.

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

Regards



**Charles W. Munce, P.E.**  
Project Coordinator

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

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<sup>3</sup> GHD, 2021. *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.