FOURTH FIVE-YEAR REVIEW REPORT FOR PETRO-CHEMICAL SYSTEMS, INC. (TURTLE BAYOU) SUPERFUND SITE LIBERTY COUNTY, TEXAS



August 2016



Prepared by

U.S. Environmental Protection Agency Region 6 Dallas, Texas

FOURTH FIVE-YEAR REVIEW REPORT PETRO-CHEMICAL SYSTEMS, INC. (TURTLE BAYOU) SUPERFUND SITE EPA ID#: TXD980873350 LIBERTY COUNTY, TEXAS

This memorandum documents the U.S. Environmental Protection Agency's performance, determinations and approval of the Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund site (Site) fourth five-year review under Section 121 (e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S. Code Section 9621 (c), as provided in the attached Fourth Five-Year Review Report.

Summary of the Fourth Five-Year Review Report

The site remedy consists of short-term removal actions and long-term remedial actions. The long-term remedial actions for operable unit 1 (OU1) include excavation of contaminated soil on County Road 126 (CR126) and placement of the material in a Resource Conservation and Recovery Act (RCRA) storage facility at OU2. In addition, institutional controls are in place to prevent exposure to any residual contaminated soils remaining under CR126. The OU2 long-term remedy addresses soil and groundwater contamination at seven areas along CR126. The OU2 soil remedy consists of treatment, on-site consolidation, capping of contaminated soils, surface restoration and stormwater controls. The OU2 groundwater remedy consists of treatment, and long-term maintenance and monitoring. Technical Impracticability (TI) Waiver Zones have been established for different areas of the Site and long term ground water monitoring is being conducted in these areas to ensure that the plume is not migrating. Not all institutional controls in the form of groundwater and land use restrictions are in place.

<u>Human Exposure Status</u>: Under Control <u>Contaminated Groundwater Status</u>: Under Control

Actions Needed

The following actions must be taken for the remedy to be protective over the long term:

- Evaluate the protectiveness of the groundwater protection standards for 1,1-dichloroethane, acetone and naphthalene in light of current toxicity values or drinking water criteria.
- Evaluate the technical impracticability (TI) and Compliance Zone boundaries southwest of the Main Waste Area (MWA) and Office Trailer Area (OTA) in the vicinity of MW-035 and evaluate whether the TI boundary and compliance boundary needs to be expanded in the vicinity of this well
- Install a well south of MW-161 in the MW-10 subarea of the OTA to monitor any plume expansion before it reaches the TI boundary.
- Complete the implementation of remaining institutional controls at all parcels impacted by the Site.
- Establish a TI waiver once the groundwater contamination delineation is completed at the MW-109 Area

Determination

I have determined that the selected remedy for the Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund site is currently protective of human health and the environment in the short term. This Five-Year Review Report specifies the actions that need to be taken for the remedy to be protective over the long term.

Carl E. Edlund, P.E.

<u>8/19/16</u>

Director, Superfund Division U.S. Environmental Protection Agency Region 6

CONCURRENCES

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ISSUES/RECOMMENDATIONS

FOURTH FIVE-YEAR REVIEW REPORT PETRO-CHEMICAL SYSTEMS, INC. (TURTLE BAYOU) SUPERFUND SITE EPA ID#: TXD980873350 LIBERTY COUNTY, TEXAS

Issues/Recommendations

OU(s) without Issues/Recommendations Identified in the Five-Year Review:

OU1

Issues and Recommendations Identified in the Five-Year Review:

OU(s): OU2	Issue Category: Remedy Performance			
	Issue: The groundwater protection standards for 1,1-dichloroethane, acetone and naphthalene may not be stringent enough for monitoring the TI and Compliance Zones.			
	Recommendation: Evaluate whether groundwater protection standards should be revised for 1,1-dichloroethane, acetone and naphthalene to reflect current toxicity values. If so, determine if the TI and Compliance Zones need to be revised.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA/State	6/11/2017

OU(s):	Issue Category: Remedy Performance			
OU2	Issue: Contamination has been detected above cleanup goals outside of the Compliance Zone southwest of the Main Waste Area (MWA) and Office Trailer Area (OTA) in well MW-035.			
	Recommendation: Evaluate whether the TI and Compliance Zones requires expansion in the vicinity of well MW-035.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	PRP	EPA/State	6/11/2017

OU(s):	Issue Category: Remedy Performance
002	Issue: TBA concentrations appear stable but remain well above the cleanup goal of 2,200 μ g/L in MW-161 in the MW-10 subarea. However, there are no wells south of this well to monitor whether this contaminant remains below the cleanup goal in the Compliance Zone.
	Recommendation: Install a well south of MW-161 to evaluate whether TBA in the MW-10 subarea remains below the cleanup goal within the Compliance Zone.

Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	PRP	EPA/State	6/11/2017

OU(s): OU2	Issue Category: Institutional Controls			
	Issue: Not all institutional controls have been implemented by the potentially responsible parties (PRPs) and Trustee as outlined in site decision documents.			
	Recommendation: Complete implementation of remaining institutional controls at all parcels impacted by the Site.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	PRP	EPA/State	6/11/2017

OU(s): OU2	Issue Category: Monitoring			
	Issue: A technical impracticability waiver for the MW-109 Area needs to be established based on the delineated groundwater plume.			
	Recommendation: Establish a TI waiver once the groundwater contamination delineation is completed.			er contamination
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA	12/1/2016

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LIST OF ABBREVIATIONS & ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
AROD	Amended Record of Decision
BDA	Bayou Disposal Area
C1	Clay Unit 1
C2	Clay Unit 2
CalEPA	California Environmental Protection Agency
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Contaminant of Concern
CR126	County Road 126
EA	Easement Area
EPA	Environmental Protection Agency
EPEC	El Paso Energy Corporation Polymers, Inc.
ESD	Explanation of Significant Differences
FWRA	Far West Road Area (another name for CR126 West Area)
FYR	Five-Year Review
НО	Hazard Ouotient
IC	Institutional Control
ICP	Institutional Controls Plan
IDW	Investigation Derived Waste
ISB	In-situ Bioremediation
ISCO	In-situ Chemical Oxidation
ISTD	In-situ Thermal Desorption
M1	Silt Unit
MCL	Maximum Contaminant Level
ug/L	Microgram per Liter
mg/kg	Milligram per Kilogram
mg/L	Milligram per Liter
MOA	Memorandum of Agreement
MNA	Monitored Natural Attenuation
MWA	Main Waste Area
MW	Monitoring Well
NA	Natural Attenuation
NAPL	Non-aqueous Phase Liquid
NCP	National Contingency Plan
ND	Not Detected
NPL	National Priorities List
OU	Operable Unit
O&M	Operation and Maintenance
OTA	Office Trailer Area
РАН	Polycyclic Aromatic Hydrocarbon
PCL	Protective Concentration Limit
PRP	Potentially Responsible Party
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RPM	Remedial Project Manager
RSL	Regional Screening Level
SAP	Sampling and Analysis Plan

Sand Unit 1
Sand Unit 2
Soil Vapor Extraction
Semi-volatile Organic Compound
Tert-butyl Alcohol
To-Be-Considered
Texas Commission on Environmental Quality
Technical Impracticability
Texas Natural Resource Conservation Commission
Texas Risk Reduction Program
Temporary RCRA Storage Facility
Texas Water Commission
Unilateral Administrative Order
United States Army Corps of Engineers
Unlimited Use and Unrestricted Exposure
Volatile Organic Compound
West Road Area

I. INTRODUCTION

The purpose of a five-year review (FYR) is to evaluate the implementation and performance of a remedy to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The U.S. Environmental Protection Agency (EPA) is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Contingency Plan (NCP)(40 CFR Section 300.430(f)(4)(ii)), and considering EPA policy.

This is the fourth FYR for the Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund site (Site). The triggering action for this statutory review is the completion date of the previous FYR. The FYR has been prepared due to the fact that hazardous substances, pollutants or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE). The documents used in preparing this FYR are summarized in Appendix A.

The Site consists of two operable units (OUs); this FYR addresses both of them. OU1 addresses the soil remedy for the Frontier Park Road area (now known as County Road 126, or CR126). OU2 addresses the soil and groundwater remedies at seven other areas of the Site located along CR126, including the West Road Area (WRA), Main Waste Area (MWA), Office Trailer Area (OTA), Power Easement Area (EA), Far West Road Area (FWRA), Bayou Disposal Area (BDA) and MW-109 Area.

The FYR was led by EPA remedial project manager (RPM) Rajalakshmi Josiam. Participants included Audrey Kirtley with the Texas Commission on Environmental Quality (TCEQ); Joseph Wiley with Kinder-Morgan Inc., project manager for its subsidiary and potentially responsible party (PRP) El Paso Energy Corporation Polymers, Inc. (EPEC); Angela DeDolph with Ramboll Environ (contractor for the Lyondell Trust); and EPA contractor support from Eric Marsh and Claire Marcussen of Skeo Solutions. The review began on 9/29/2015.

Site Background

The 500-acre area is located in rural Liberty County, 15 miles southeast of the town of Liberty, Texas (Figure 1). The Texas Water Quality Board has records of waste disposal as early as 1971. They indicate that waste oils from nearby petroleum refining activities were disposed of in unlined pits and on Frontier Park Road for dust suppression. Because the Site was never an authorized waste disposal facility, the exact nature of disposal activities is uncertain. However, it appears that the waste was dumped indiscriminately from trucks at eight areas identified by EPA, including dumping of contaminated soil and groundwater with volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The eight waste disposal areas that comprise OU1 and OU2 are shown in Figure 2. EPA proposed the Site for listing on the Superfund program's National Priorities List (NPL) in October 1984. EPA listed the Site on the NPL in May 1986.

Historical and current land uses continue to consist of cropland, pasture, range, forest and small rural communities. Following waste disposal activities, the Site's owner subdivided the area into 5-acre and 15-acre plots and sold them for residential development. Residential use of the Site has been continuous since 1974, except when remedial activities required temporary relocation of residents. No residents live on any of the identified waste disposal areas. Seven families live near four disposal areas (FWRA, MW-109, EA and BDA), with four residences on-site and three residences off-site. The Site's contaminated groundwater is present in two sand zones (S1 and S2). The S1 zone lies below an uppermost clay unit (C1) and silt unit (M1). A second clay layer (C2) lies at the base of the S1 zone, isolating the S1 zone from the S2 zone.

The shallow zones are not currently in use as a source of drinking water on site. However, the shallow aquifer does have the potential for use as a source for drinking water in the future. Shallow water supply wells near remediation areas have been plugged and abandoned. Appendix C provides a detailed summary of the Site's physical characteristics and history.

Figure 1: Site Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the Site.

Figure 2: Site Detail



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding EPA's response actions at the Site.

FIVE-YEAR REVIEW SUMMARY FORM

	SITI	E IDENTIFICATION				
Site Name: Petro-	Chemical Systems,	Inc. (Turtle Bayou)				
EPA ID: TXD9	80873350					
Region: 6	State: TX	City/County: Liberty County				
		SITE STATUS				
NPL Status: Final						
Multiple OUs? Yes	s? Has the site achieved construction completion? Yes					
REVIEW STATUS						
Lead agency: EPA						
Author name: Rajalakshmi Josiam, with additional support provided by Skeo Solutions						
Author affiliation: EPA Region 6						
Review period: 9/29/2015 - 7/15/2016						
Date of site inspection: 1/12/2016						
Type of review: Statutory						
Review number: 4						
Triggering action date	: 9/16/2011					
Due date (five years af	ter triggering actio	<i>n date</i>): 9/16/2016				

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

The agencies concluded that the risk of exposure to contaminants was high for people living along CR126 due to the presence of contaminated soils at or near surface and because CR126 is the primary access route for people living on site. The baseline risk assessment for OU2 demonstrated that exposure to contaminated soil and groundwater were the primary exposure pathways resulting in unacceptable human health risks. Table 1 summarizes the primary exposure media and contaminants of concern (COCs) for OU1 and OU2. The ecological risk assessment showed that exposure to contaminated site areas was not expected to be significant. The highest soil contaminant concentrations were detected at depth, and surface water and sediment were not significantly impacted. No federally endangered species were identified at the Site.

Response Actions

To manage the cleanup, EPA and TCEQ divided the Site into two OUs. OU1 addresses contaminated soil along CR126. OU2 addresses contaminated soil and groundwater at the remaining seven areas of the Site: the WRA, MWA, OTA, EA, FWRA, BDA and MW-109 Area.

OU	Media	COC
OU1 ^a	Sail	Benzene
001	5011	Naphthalene
		Benzene
	Soil	Lead
	5011	Naphthalene
		Vinyl chloride
		1,1,2-trichloroethane
		1,1-dichloroethane
		1,1-dichloroethylene
		1,2-dichloroethane
		1,2-dichloropropane
OU2 ^b	Groundwater	Acetone
		Benzene
		Cis-1,2-dichloroethylene
		Ethylbenzene
		Lead
		Naphthalene
		Styrene
		Tert-butyl alcohol (TBA)
		Toluene
		Trans-1,2-dichloroethylene
		Trichloroethylene
		Vinyl chloride
		Xylene
Notes:		
a. COC list fro	m 1987 Record of I	Decision (ROD).
b.COC list fro	m 2006 Amended F	ROD.

Table 1: Summary of Contaminated Media and COCs at OU1 and OU2

OU1

EPA issued the OU1 Record of Decision (ROD) in March 1987. It did not establish formal remedial action objectives (RAOs). However, the ROD did list the following goals:

- Prevent direct contact with highly contaminated soil = soils > 100 milligrams per kilogram (mg/kg) total polycyclic aromatic hydrocarbons (PAHs) and total VOCs.
- Minimize direct contact with moderately contaminated soil = soils between 10 mg/kg and 100 mg/kg total PAHs and total VOCs.
- Improve access to the Site for heavy equipment to facilitate remedial investigation sampling and monitoring as well as future remedial actions at other areas of the Site.

The remedy selected in the OU1 ROD included:

- Excavation and removal of highly contaminated soil and storage on site in a Temporary Resource Conservation and Recovery Act (RCRA) storage facility (TRSF) until selection of a permanent remedy.
- Backfilling of excavated areas with clean soil.
- Construction of a road over excavated areas and existing roadway to provide access to the Site.
- Maintenance of the road and TRSF.
- Temporary relocation of on-site residents during excavation.

*OU*2

EPA issued a 1991 ROD, two Amended RODs (ARODs) in 1998 and 2006, respectively, and three Explanations of Significant Differences (ESDs) – one in 2010 and two in 2012 – documenting that restoring groundwater at OU2 is technically impracticable. Thus EPA selected technical impracticability (TI) waivers as the groundwater remedy for each of the seven disposal areas in OU2 (Table 3) that includes a 2-year transitional period to indicate that natural attenuation (NA) is occurring. EPEC is the PRP for the FWRA and BDA. The Lyondell Custodial Environmental Trust (formerly known as the Lyondell Chemical Company is the Trustee for the WRA, MWA, OTA and EA. EPA is responsible for implementing the remedy at MW-109.

The remedial components for soil and groundwater vary for each source area within OU2. Due to localized areas of elevated groundwater contamination within the OTA, the Trustee identified three subareas for the purposes of designating TI Zone boundaries in the OTA; the subareas include the B-53, MW-45 and MW-10 areas. The components applicable to each source area and subarea are presented in Table 2. A detailed summary of the Site's chronology is presented in Appendix D. The appendix also includes a summary of the decision documents, RAOs and remedy components for each of the waste disposal areas in OU2.

Source Area Media		Remedial Action Component ^a
	Soil	ISCO
ГWKA	Groundwater	TI waiver with natural attenuation (NA)
	Soil	ISCO
MW-109	5011	On-site biotreatment
	Groundwater	TI waiver with NA
		Soil vapor extraction (SVE)
	Soil	Surfactant flushing
	5011	In-situ thermal desorption (ISTD)
WRA		In-situ chemical oxidation (ISCO)
		In-situ bioremediation (ISB) with extraction
	Groundwater	Containment (slurry wall)
		TI waiver zone with NA
		SVE
	Soil	ISTD
MWA		On-site biotreatment
	Groundwater	ISB with extraction
	Glouidwater	TI waiver with NA
		SVE
	Soil	Bioventing
ΟΤΑ	DOI	ISTD
0111		On-site biotreatment
	Groundwater	ISB with extraction
	Groundwater	TI waiver with NA
OTA Subaraas D 52	Soil	SVE
ond MW 45	Constant	ISB with extraction
and MW-45	Groundwater	TI waiver with NA
	Soil	No action
OTA Subarea MW-10 Area	C 1	ISB with extraction
	Groundwater	TI waiver with NA
		SVE
	Soil	ISTD
EA-North		On-site biotreatment
	0 1 /	ISB with extraction
	Groundwater	TI waiver with NA
		SVE
EA-South	Soil	ISTD
	Groundwater	ISB with extraction

 Table 2: OU2 Source Area-Specific Remedial Components

Source Area	Media Remedial Action Component ^a					
		TI waiver with NA				
	Soil No action					
DDA	Groundwater No action					
Notes:						
a. Decision documents offered a number of possible remedial options for soil and groundwater.						
To promote clarity, the remedial components actually used are presented from the Site's 2010						
Preliminary Close-Out Report.						

The OU2 soil and groundwater protection standards, as defined by the 1991 ROD, 1998 and 2006 ARODs, and 2012 ESDs are summarized in Table 3 and Table 4, respectively.

	Table 3: Summary	of OU2 Non	-residential Soil	Cleanup Levels
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СОС	Depth Interval (feet)	Cleanup Goal (mg/kg) ^a	Basis
	NA	36	TCEQ Tier 1 Commercial Industrial
Benzene	1421	50	Protective Concentration Limit (PCL)
Lead	NA	800	EPA non-residential value
Naphthalene	NA	190	TCEQ Tier 1 Commercial Industrial PCL
Vinyl chloride	NA	10	TCEQ Tier 1 Commercial Industrial PCL
Notes:			
a. From Table 20 of the	2006 AROI	D, applies to the O	CR126 right-of-way.
mg/kg = milligrams pe	er kilogram		

NA = not applicable to non-residential areas

Table 4: Summary of OU2 Groundwater Protection Standards

COC	Standard ^a (µg/L)	Basis
1,1,2-trichloroethane	5	Federal maximum contaminant level (MCL)
1,1-dichloroethane	4,900 ^b	TCEQ Texas Risk Reduction Program, Tier One Groundwater Protective Concentration Limits (TRRP Tier One PCL)
1,1-dichloroethylene	7	Federal MCL
1,2-dichloroethane	5	Federal MCL
1,2-dichloropropane	5	Federal MCL
Acetone	22,000	TCEQ TRRP Tier One PCL
Benzene	5	Federal MCL
Cis-1,2-dichloroethylene	70	Federal MCL
Ethylbenzene	700	Federal MCL
Lead	15	Federal MCL
Naphthalene	327	1991 ROD health-based value
Styrene	100	Federal MCL
TBA	2,200	TCEQ TRRP Tier One PCL
Toluene	1,000	Federal MCL
Trans-1,2-dichloroethylene	100	Federal MCL
Trichloroethylene	5	Federal MCL
Vinyl chloride	2	Federal MCL
Xylene	10,000	Federal MCL

Notes:

a. Values from Table 17 of 2006 AROD.

b. Value updated in the 2012 ESDs for EPEC and Lyondell Trust properties; Table 2 in both ESDs.

TRRP Tier One PCL = Texas Risk Reduction Program, Tier One Groundwater Protective Concentration Limit

MCL = maximum contaminant level

 $\mu g/L = micrograms per liter$

Status of Implementation

OU1

EPA and TCEQ completed the remedial design between June 1987 and October 1987. The remedial action started in January 1988. EPA excavated contaminated soils from 1 to 5 feet below ground surface along 1,800 feet of CR126; excavated materials were placed in a temporary, aboveground RCRA storage facility (TRSF) on site in the MWA. EPA then backfilled the excavated area with clean soil. The entire length of the road was paved, which prevents direct contact with less-contaminated soils. EPA completed the remedy for OU1 in August 1988. In 2009, EPA entered into an interagency agreement with the U.S. Army Corps of Engineers (USACE) to re-surface CR126 to meet Liberty County Road Specifications. The Liberty County Commissioner's Court approved the CR126 road resurfacing design in June 2010; road resurfacing finished in September 2010. In October 2010, the Court agreed to accept the road as a county road. A Memorandum of Agreement (MOA) dated January 21, 2011, is in place between EPA and Liberty County for the County to operate and maintain CR126. USACE obtained the necessary signatures on an easement agreement from all property owners next to CR126 and submitted the documents to the County in August 2013. Liberty County has assumed responsibility for the ongoing and continued maintenance, improvement and upkeep of the road in accordance with the MOA.

OU2-EPEC Properties

In August 2007, EPA entered into a Consent Decree with EPEC requiring them to address contamination in the Site's FWRA and BDA. EPEC began the In-situ Chemical Oxidation (ISCO) remedial action construction work in the FWRA in March 2008 and completed the remedial action in September 2008. EPEC collected confirmatory samples in October 2008; they confirmed that soil cleanup criteria were met. EPEC conducted a statistical evaluation of soil data in the BDA in February 2007 that indicated that the non-residential soil cleanup criteria had been met. Hence, no excavation was required for the affected soil. Groundwater also met cleanup criteria in the BDA. Therefore, EPEC also plugged and abandoned three monitoring wells in the area in March 2008 and completed installation of a security fence around the BDA in July 2008. EPA's decision to establish a TI waiver zone for the residual groundwater contamination at FWRA is documented in another August 2012 ESD specifically for the EPEC properties. Long-term monitoring is currently taking place to monitor whether contaminant plumes remain within the TI Zone and comply with ARARs within the Compliance Zone (an area beyond the TI Zone).

OU2-MW-109

The ISCO remedy at the MW-109 Area was implemented in 2010. After two rounds of chemical injections and several rounds of injections in the western quadrant of the MW-109 Area, soil remediation goals were not met. In March 2011, an alternative remedy identified in the 1998 AROD – soil excavation with ex-situ biotreatment – was implemented to meet residential and industrial right-of-way cleanup goals. In addition, in 2011, three additional groundwater monitoring wells were installed in the MW-109 area. Eight rounds of quarterly sampling followed. The results indicate that further delineation of the plume is necessary. In May 2016, EPA completed the delineation of the plume and installed four monitoring wells. Sampling of these wells is expected to begin in the summer of 2016.

OU2-Lyondell Trust Properties

In December 1993, EPA issued a Unilateral Administrative Order (UAO) to Lyondell Chemical Company and ARCO to work with EPA and the Texas Natural Resource Conservation Commission (TNRCC) to complete the OU2 remedial design for the WRA, MWA, OTA, EA and BDA. The OU2 remedial design began in September 1992 and finished in May 1998. In December 1998, EPA entered into a Consent Decree with Lyondell and ARCO that superseded the provisions of the 1993 UAO. It required that EPA and TCEQ address contamination in the BDA while Lyondell addressed the WRA, MWA, OTA and EA. However, in 2000, EPA determined that the BDA and Far West Road Area were EPEC's responsibility as part of its settlement with EPEC.

Lyondell completed the remedial action using a variety of soil and groundwater remedial technologies at the four areas between January 1996 and September 2010 pursuant to the Consent Decree (Table 2). Based on more than seven years of active remediation, EPA determined that attaining the Site's groundwater cleanup goals was technically impracticable. Lyondell purchased the affected areas to preclude access and residential exposure. Lyondell filed for bankruptcy in 2010. The Lyondell Trust was established to complete the remediation of the former Lyondell areas of the Site. EPA issued the Preliminary Close-Out Report for OU2 construction completion in September 2010.

EPA and TCEQ have been working with the Lyondell Trust on the OU2 actions. EPA approved a TI waiver zone for residual groundwater contamination at the Lyondell Trust properties in an August 2012 ESD. Lyondell Trust contractors completed an Operations and Maintenance Plan (O&M Plan) for the West Road Slurry Wall in February 2016 and made revisions to the Long-Term Groundwater Monitoring Plan in January 2016 to ensure contaminants remain within the TI Zone and comply with ARARs in the Compliance Zone.

Institutional Control (IC) Summary Table

EPA and Liberty County signed an MOA on January 21, 2011, for the County to operate and maintain CR126. Since CR-126 serves as a cap for remaining soils with concentrations of less than 100 mg/kg of PNAs or VOCs, the MOA requires that the County notify EPA any time extensive road repairs are warranted or when there is a need to dig through CR126. The County is required to submit roadwork repair and dig plans to EPA for review and approval to make sure activities do not expose residual contamination.

The 1991 ROD, 2006 AROD and 2010 ESD required soil and groundwater institutional controls at OU2. EPEC has purchased several properties and has institutional controls in place at other properties. These controls grant EPEC groundwater rights across those properties and/or restrict land use for those properties.

A summary of the institutional controls planned and implemented at EPEC-owned properties or properties where EPEC owns the groundwater rights is presented in Table 5. Maps showing the institutional controls implemented at the EPEC-owned properties is presented in Appendix B.

Media, Engineered Controls, and Areas that do not Support UU/UE Based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date Filed (or planned)
			BDA		
Groundwater	Yes	Yes	Lot 5 of Parcel 10473 Lot 8 of Parcel 19470	Restrict installation of groundwater wells and groundwater use.	General Warranty Deed for Groundwater Easement and Restrictive Covenants, June 13, 2009
Soil and Groundwater	Yes	Yes	Lot 15 and 36 of Parcel 19502 Lot 37 of Parcel 19503	Prohibit use of groundwater and any kind of residential use or unrestricted recreational use of property.	Special Warranty Deed with Restrictive Covenants July 11, 2012

Table 5: Summary of Planned and/or Implemented ICs for the EPEC OU2 Properties

Media, Engineered Controls, and Areas that do not Support UU/UE Based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date Filed (or planned)
Groundwater	Yes	Yes	Lots 7, 11, 38 and 39 of Parcel 19475	Restrict groundwater use and any kind of residential use or unrestricted recreational use of property.	Recording of restrictive covenant is pending
		Γ	FWR	A	1
Groundwater	Yes	Yes	Lot 57 of Parcel 128433 (Includes MW-109 Area) Lot 101 of Parcel 120240 Lots 78 and 86 of Parcel 19456 Lots 47, 83, 87 and 90 of Parcel 19453 Lots 91 and 95 of Parcel 19467	Restrict the use of groundwater in the S1 and S2 water- bearing zones within a 1,000-foot radius of the source area.	General Warranty Deed for Groundwater Easement and Restrictive Covenants, May 7, 2012 General Warranty Deed for Groundwater Easement and Restrictive Covenants, June 27, 2008 General Warranty Deed for Groundwater Easement and Restrictive Covenants, May 1, 2009 Special Warranty Deed, December 17, 2009 General Warranty Deed for Groundwater Easement and Restrictive Covenants, April 10, 2008
Soil and Groundwater	Yes	Yes	Lot 81 of Parcel 19365	Restrict soil excavation and groundwater use.	Declaration of Covenants, Conditions and Restrictions, August 23, 2002
Groundwater	Yes	Yes	Lots 16, 32, 34, 40 ^a , 63, 81, 94, 107, 112 and 113 of Parcel 19365	Restrict groundwater use.	EPEC owns these parcels and ICs have not yet been implemented. However the parcels will be restricted as part of the sale of the property as deed restrictions, or as a separate restrictive covenant prior to the sale of the property.
Groundwater	Yes	Yes	Lot 31 ^b of Parcel 19364	Restrict groundwater use.	EPEC has been in discussions with the owners of Lot 31 regarding the placement of groundwater restrictions on a portion of that property.

Notes:

a. This lot located within the 1,000-foot radius for which EPEC is in the process of restricting the use of groundwater between the land surface and a depth of 175 feet. The only institutional control required is the restriction of groundwater use between the land surface and a depth of 175 feet. No excavation or construction restrictions are required.

b. EPEC does not own this lot. It is, however, located within the 1,000-foot radius for which EPEC will restrict the use of groundwater between the land surface and a depth of 175 feet. EPEC has been working with the owner of this parcel since 2007 to establish a restriction on the water use for the portion of the property that lies within the 1,000-foot radius. An agreement between EPEC and the property owner(s) may be reached in the near future.

As of February 2005, Lyondell acquired all contaminated properties in the WRA, MWA, OTA and EA. It restricted access to these areas such that residential use does not occur. Since acquiring these properties, Lyondell's bankruptcy was finalized, and the Lyondell Trust was established in March 2010. EPA and TCEQ approved the TI Zones for the Lyondell Trust properties in 2012 following the 2-year monitoring period. Except for the MW-109 area, access to the OU2 disposal areas is controlled by a combination of fences, gates, signs, cable guards and natural barriers. Signs are posted at access locations, which indicate that there may be chemicals on the property and that digging and drilling are restricted to protect human health and the environment. Soil has been remediated to residential standards at the MW-109 area. However, residual contamination remains in groundwater. Eight rounds of quarterly sampling followed. The results indicate that further delineation of the plume is necessary. In May 2016, EPA completed the delineation of the groundwater plume and installed four additional monitoring wells.Sampling of these wells is expected to begin in summer 2016. As of March 2016, institutional controls have not yet been placed on the properties, including restrictions on land and use and drilling of wells. However, the implementation of institutional controls is anticipated to occur second quarter of 2016. Table 6 summarizes the institutional controls planned at the Lyondell trust-owned properties.

Media, Engineered Controls, and Areas that do not Support UU/UE based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
			WRA		
Groundwater and Soil	Yes	Yes	Parcels 19350 and 19352	Restrict groundwater and land use. Restrict excavation and construction. Restrict site access.	Property conveyance restriction and property use restriction proposed.
MWA and OTA (includes B-53, MW-45 and MW-10 subareas)					
Groundwater and Soil	Yes	Yes	Parcels 19343, 19348, 19350, 19352, 19366, 19432, 19433, 19468, 19480, 19488, 145649 and 147914	Restrict groundwater and land use Restrict excavation and construction. Restrict site access.	Property conveyance restriction and property use restriction proposed.
Groundwater	Yes	Yes	Parcels 19282, 19368 and 19489	Restrict groundwater use.	Property conveyance restriction proposed.
EA					
Groundwater and Soil	Yes	Yes	Parcels 19509, 19471, 19500, 19434 and 19281	Restrict groundwater and land use. Restrict excavation and construction. Restrict site access.	Property conveyance restriction and property use restriction proposed.
Groundwater	Yes	Yes	Parcels 19469, 19490, 19491 and	Restrict groundwater use.	Property conveyance restriction proposed.

Table 6: Summary of Planned and/or Implemented ICs for the OU2 Lyondell Trust Owned Properties

Media, Engineered Controls, and Areas that do not Support UU/UE based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
			19510		

The 2010 ESD specifies that EPA will work with the landowner to place a deed restriction on the property in the MW-109 Area. EPEC has implemented the ICs for the residential property (Lot 57 of parcel 128433) as summarized in Table 5. EPA is continuing to delineate the groundwater contamination to support the development of a TI waiver for the MW-109 area.

Systems Operations/Operation & Maintenance

OU1

On October 26, 2010, the Liberty County Commissioners Court accepted the as-built condition of CR126 as a County Road and assumed responsibility for its operations and maintenance. EPA and Liberty County signed a MOA on January 21, 2011, for the County to operate and maintain the road. Maintenance may include ditch clearing, crack repair, culvert maintenance and other maintenance. Costs were not available from the County.

OU2 – Lyondell Trust Properties

Lyondell completed active remediation in the WRA, MWA, OTA, and EA in July 2005. Non-residential soil cleanup criteria have been met for these areas. However, groundwater cleanup criteria were not met in any of these areas despite remedial activities. Since the end of remedial operations in 2005, operations at the WRA, MWA, OTA, and EA have included groundwater monitoring, fence installation and maintenance, mowing, vegetation control, and other O&M activities. Contractors for the Lyondell Trust monitor groundwater to assess natural attenuation and to ensure compliance with the TI waiver zone established in August 2012.

The Lyondell Trust conducts O&M activities according to the 2016 Long-Term Maintenance Plan to evaluate the condition of the trust properties and ensure contamination remains within the final TI and Compliance Zone boundaries. These activities include site maintenance once per quarter that includes mowing, fence repair, and removal of downed trees, as needed to maintain the physical access restrictions at the Site and to keep interior portions of the Site accessible for periodic monitoring. In addition, the Trustee contractors conduct site inspections once per quarter and complete groundwater monitoring semi-annually. The Lyondell Trust also conducts additional O&M activities that pertain to the WRA slurry wall but has not yet finalized the O&M Plan for the TRSF. A summary of the O&M costs implemented at the Lyondell Trust properties is provided in **Table 7**.

Year	Total Cost (rounded to the nearest \$1,000)
2010	\$574,000
2011	\$806,000
2012	\$1,010,000
2013	\$591,000
2014	\$369,000
2015	\$507,000

Table 7: Lyondell Annual O&M Costs

OU2 – EPEC Properties

EPEC completed active remediation at the Site in October 2008. The only O&M still required on the EPEC properties is long-term groundwater monitoring and periodic inspections that include maintenance of security fences, mowing and repairs to wells, as necessary. EPEC conducts site inspections twice each year, usually in June and December, and include a site walk to check the status of each monitoring well (to ensure they are closed and locked) and the integrity of fences, storage garage, gates and locks. Any deficiencies are noted, photographed and addressed by the appropriate party. Since the TI Zone was established in August 2012 for the FWRA (the BDA did not require a TI waiver), EPEC has conducted groundwater monitoring for the S1 and S2 water bearing zones every 18 months for three years (two total sampling events) to document stability of dissolved COCs in groundwater. Sampling includes interior and exterior monitoring wells for both water-bearing zones. The first post TI waiver zone sampling events occurred in December 2011, June 2013 and December 2014. The fourth event is planned for June 2016. The O&M activities are described in the Sampling and Analysis Plan (SAP), the Long-Term Monitoring Plan, and the IC Plan (Appendices N, O and P, respectively), of the 2012 Remedial Design Report. Based on the 2006 AROD, EPEC has completed the requisite 2-year monitoring to demonstrate that NA is occurring. On November 5, 2015, EPA approved a modification to the Long-Term Groundwater Monitoring Plan that eliminated sampling requirements for natural attenuation parameters and lead. A summary of the O&M costs for the FYR are presented in Table 8. The costs were higher in 2010 to 2012 because the TI zone was established during this time.

Year	Total Cost (rounded to the nearest \$1,000)
2010	\$231,000
2011	\$143,000
2012	\$200,000
2013	\$59,000
2014	\$10,000
2015	\$32,000

Table 8: EPEC Annual O&M Costs

MW-109 Area

EPA completed the delineation of the groundwater plume and installed four additional monitoring wells in May 2016 in the MW-109 area. Sampling of these wells is expected to begin in summer 2016.

III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the last FYR (Table 9) as well as the recommendations from the last FYR and the current status of those recommendations (Table 10).

Table 9: Protectiveness Determinations/Statements from the 2011 FY
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OU #	Protectiveness Determination	Protectiveness Statement
1	Protective	The remedy at OU1 is protective of human health and environment.
2	Short-term Protective	The remedy at OU2 (the rest of the Site) is protective in the short term. The remedy will be protective in the long term provided that the action items identified in this Third Five-Year Review are addressed.

Issue	Recommendation ^a	Current Status	Current Implementation Status Description	Completion Date (if applicable)
		OU1		
	14 – Liberty County should perform year-round maintenance of the vegetation along roadway, particularly the curves, that can restrict visibility.	Completed	Liberty County Commissioner's Court met on October 26, 2010, to accept the road as a County Road.	8/21/2013
		OU2		
	1 – Evaluate two years of groundwater monitoring data in the MW-109 Area.	Completed	EPA completed a Data Evaluation Report.	4/1/2013
	2 – Establish TI waiver zones in the FWRA, MWA, WRA, OTA and EA after the EPA and TCEQ have reviewed documents establishing the	Completed	TI waiver zone document for the FWRA finalized and the ESD signed.	8/17/2012
Define boundaries for groundwater subject to the TI waiver.	TI waiver zones. 3 – Perform trend analyses as more groundwater data becomes available, to establish trends in horizontal and vertical COC migration.	Completed	TI waiver zone for Lyondell Trust properties finalized and ESD signed.	8/22/2012
	4 — The groundwater monitoring program for Lyondell Trust properties should be updated and implemented. The locations where increasing concentrations of contaminants were found will be investigated and addressed further, although additional characterization after the FYR period sufficiently characterized the groundwater plumes for the properties and a TI Boundaries Plan was submitted to EPA and TCEQ for review.	Completed	Lyondell Trust completed a Long-Term Monitoring Plan in 2012. The plan is currently under revision based on monitoring since the TI boundaries were established.	10/1/2012
	5 – Develop O&M plans for the MW-109 Area.	Considered But Not Implemented	O&M has not begun because the remedial action is still ongoing. Additional investigation is ongoing to establish a TI waiver zone.	NA
O&M plans	6 – Finalize O&M plans for the FWRA and BDA.	Completed	The Long-Term Monitoring Plan was revised as part of the Remedial Design Report.	6/1/2012
established for all areas	7 – The Lyondell Trust should remove all remaining drums, infrastructure and construction debris (e.g., well casings, wastewater treatment plant debris), and remove or properly abandon remaining stickups and any associated underground piping, particularly from the MWA and OTA. Consideration may need to be given to whether any sampling needs to be	Completed	Drums/Investigation Derived Waste (IDW) have been removed. The only remaining drums are drums currently used to stage IDW; they are waiting for disposal. Also, about 150 wells have been abandoned according to the September 2015 Work Plan.	Drums removed 2/18/2016 Wells abandoned 12/1/2015- 12/4/2015

Table 10: Status of Recommendations from the 2011 OU2 FYR

Issue	Recommendation ^a	Current Status	Current Implementation Status Description	Completion Date (if applicable)
	conducted in associated with proper completion.			
	8 – The Lyondell Trust should remove leachate water from sumps at the MWA TRSF and include monitoring of the sump and leachate removal in future O&M plans.	Ongoing	The Lyondell Trust submitted an O&M Plan for the TRSF to EPA in October 2013. Based on EPA's review, the O&M Plan requires significant revision and is expected to be resubmitted by the end of fourth quarter of 2016.	NA
	9 – The Lyondell Trust should update their contact information on posted signs at the Site.	Completed	Contact information updated.	5/16/2012
	10 – O&M for the WRA slurry wall must be reviewed and actions taken accordingly.	Completed	Action completed. EPA approved the O&M Plan.	2/25/2016
	11 – O&M of the TRSF at the MWA must be reviewed and action taken accordingly.	Ongoing	The Lyondell Trust submitted an O&M Plan for the TRSF to EPA in October 2013. Based on EPA's review, the O&M Plan requires significant revision and is expected to be resubmitted to EPA by the end of fourth quarter of 2016	NA
	12 –Broken latch on gate at southeast side of the WRA should be repaired.	Completed	Repairs completed.	11/23/2011
	13 –The telephone utility company, or Liberty County, should repair the utility access pit near the MW-109 Area, which was open during the site inspection on May 5, 2011.	Completed	Completed by the utility company as confirmed by EPA inspection.	9/6/2012
	15 – Evaluate the location of inhabitable structures relative to the location of VOC-contaminated soil and/or groundwater sources, to determine if a vapor intrusion exposure pathway evaluation should be performed. This exposure pathway evaluation should be performed if inhabitable structures are or will be closer than 100 feet from VOC sources. Changes in institutional controls might be necessary.	Completed	EPA sampled a residential property near the MW- 109 area for vapor intrusion in March 2016. The sample results were evaluated and it was determined that there is no exposure pathway at the residential property from MW-109 area.	5/24/2016
ICs have not been established and implemented	16 – Groundwater rights have been purchased for BDA parcels 5 and 8 by EPEC as a precautionary measure to prevent groundwater drawdown from the BDA. Parcels 5 and 8 are not within the BDA and hence no	Completed	As a precautionary measure, EPEC worked with the owner of the parcels Lot 5 and 8 to record a restriction of groundwater use on the	5/25/2008

Issue	Recommendation ^a	Current Status	Current Implementation Status Description	Completion Date (if applicable)
in all of the areas	additional restrictions are needed on the deeds for these properties prohibiting excavation and construction at this time (2011 FYR Addendum).		properties even though not required by the ROD.	
	17 – No documentation describing the groundwater, excavation and construction restrictions on the EPEC-owned parcels within the BDA was available for review (parcel numbers 7, 38, 39 and 11). It is recommended that EPEC place restrictions on the deeds for the properties it currently owns that preclude groundwater extraction, excavation and construction so that these restrictions run with the land.	Ongoing	EPEC purchased the BDA parcels and is in the process of placing a restrictive covenant on the properties.	NA
	18 – No documentation describing the groundwater, excavation, and construction restrictions on the EPEC-owned parcels within the FWRA was available for review (parcel numbers 94, 63, 107, 81, 16, 80, 34 and 32). It is recommended that EPEC place restrictions on the deeds for the properties it currently owns that preclude groundwater extraction, excavation and construction so that these restrictions run with the land. (This item has been updated in this addendum to reflect correct parcel numbers to which this recommendation applies). (2011 FYR Addendum).	Ongoing	EPEC purchased most of the FWRA parcels and is in the process of filing restrictive covenants on these parcels, recording the restrictions required by the 2006 AROD and the Institutional Controls Plan. For properties that EPEC could not purchase, EPEC has purchased the groundwater rights, which have been filed and recorded by the Liberty County property records.	NA
	19-Groundwater rights have been purchased for FWRA parcels 47, 87, 90, 83, 78, 86, 95, 91, and 101 in accordance with the 2006 AROD and the Institutional Control Plan (ICP) within a 1,000-foot radius. No additional restrictions prohibiting excavation and construction are needed for these parcels at this time. (2011 FYR addendum).	Completed	EPEC filed groundwater restrictions with Liberty County property records.	Tracts 47, 83,84,87,90 12/17/09 Tracts 78,86 7/16/12 Tract 91,95 4/10/08 Tract 101 6/27/08
	20 – There is very little specificity regarding the precise nature of the required institutional controls for the WRA, MWA, OTA and EA. The ROD and ARODs only provide general information. It is recommended that Lyondell provide an ICP that lays out more specific information about the nature, maintenance and parcel location of	Ongoing	The ICP is expected to be submitted by the end of fourth quarter of 2016.	NA

Issue	Recommendation ^a	Current Status	Current Implementation Status Description	Completion Date (if applicable)
	use restrictions and other institutional controls.			
	21 – Evidence that deed restrictions have been recorded in the land records of Liberty County for the Lyondell Trust properties (WRA, MWA, OTA and EA) could not be identified during this FYR. Therefore, it is uncertain if the institutional control requirements of the remedies for these areas are being met. Lyondell Trust should record the required use restrictions, as specified in an ICP, on the deeds for the required parcels.	Ongoing	The ICP is expected to be submitted by the end of fourth quarter of 2016.	NA

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Involvement & Site Interviews

A public notice was made available by a press notice published in the *Liberty Vindicator* on 11/19/2015, stating that there was a draft FYR and inviting the public to submit any comments to EPA (Appendix F). The results of the review and the report will be made available at the Site's information repositories, located at the Liberty Municipal Library in Liberty, Texas, TCEQ's office in Houston, Texas, and EPA Region 6's office in Dallas, Texas.

During the FYR process, interviews were conducted to document any perceived problems or successes with the remedy that has been implemented to date. The results of these interviews are summarized below. Appendix K provides the complete interviews.

TCEQ staff indicated that, overall, the site remedy is functioning as intended. TI waiver zone boundaries may require some adjusting as more data is collected. In addition, TCEQ staff stated that many of the issues and recommendations from the prior FYR have been addressed, except for the filing of all institutional controls. EPEC's contractors continue to conduct long-term monitoring of site disposal areas, with several areas requiring institutional controls. The contractors for Lyondell Trust properties have completed active remediation at the Trust's disposal areas and continue to conduct long-term monitoring of these areas. Lyondell Trust contractors also indicated that the remedy is performing as intended and with the planned establishment of land use institutional controls, the remedy should be protective of human health and the environment. Local residents stated that they have been kept informed of environmental issues at the Site and are pleased with the remediation, with the exception of concern about some localized flooding that may have been caused by backfilled areas. One resident indicated that hunters occasionally trespass on the fenced properties where remediation had occurred however, there is no soil exposure since the area is capped and the PRPs maintain and repair the fencing on a routine basis if fencing becomes damaged.

Data Review

Historical groundwater monitoring and mass removal data have shown that active remediation has reached its technological limits. As a result, EPA issued ESDs for both EPEC and the Lyondell Trust remediation areas in 2012 that established TI waiver zones (TI Zones) for the various disposal areas. The TI zones require long-term groundwater monitoring to demonstrate that the contaminant plumes are stable or declining in concentrations. The following sections summarize the 2011 to 2015 semi-annual and annual monitoring reports available for the

EPEC properties and the Lyondell Trust properties. Since only two to three years of data have been collected since the TI Zones were established, the data evaluation focused on general observations of COC concentrations in relation to the TI and Compliance Zone boundaries.

EPEC Areas

<u>FWRA</u>

The scope of work for the Long-Term Monitoring Plan consists of groundwater monitoring of interior and exterior monitoring wells in both the S1 and S2 Sands (Table 11). The TI waiver zone is applicable to COCs in each water-bearing unit that exceed groundwater cleanup standards in the 2006 Amended ROD and companion products to these COCs. Figure I-1 shows the approximate extent of groundwater contamination in the S1 zone and S2 zone based on the data collected from October 2008 to June 2010 that were used to establish the TI Zone.

Since the TI Zone was established, additional monitoring of these wells occurred in December 2011, June 2013 and December 2014. The concentrations of COCs in many wells exhibiting variable concentrations with an overall generalized slight decline or remain relatively the same in both the S1 and S2 zones. There are a few exceptions, with monitoring well AW-61R showing a slight increase in benzene over time. However, any contamination detected above cleanup goals occurs in the interior wells, with exterior wells remaining below cleanup goals or below detection. These data indicate that the contaminant plumes are remaining within the TI Zone. However, continued monitoring is warranted to ensure that the contaminant plumes are not expanding or migrating toward the Compliance Zone. Appendix I shows the location of the interior and exterior wells and TI and compliance zones (Figure I-1) and includes summary of the analytical data for the S1 and S2 wells exceeding criteria (Table I-1 and Table I-2, respectively).

Zone	COCs	Interior Wells	Exterior Wells
S1	1,1-Dichloroethane	AW-61R	AW-41
	1,1-Dichloroethene	AW-64R	MW-176
	1,2-Dichloroethane	MW-31	MW-188-S1
	1,2-Dichloropropane	MW-126	MW-189-S2
	Benzene	MW-175	MW-190-S1
	cis-1,2-Dichloroethylene,	MW-177	MW-193-S1
	trans-1,2-Dichloroethylene	MW-178	
	TBA	MW-179	
	Vinyl chloride	MW-180	
		MW-181	
		MW-191-S1	
		TMW-23R	
S2	1,2-Dichloroethane	MP-01R S/D	MW-188-S2
	Benzene	MP-02R S/D	MW-189-S2
	TBA	MP-04R S/D	MW-190-S2
	Vinyl chloride	MW-122	MW-191-S2
		MW-123R S/D	MW-192-S2
		MW-127	MW-193-S2
		MW-172	
		MW-173	
		MW-182 S/D	
		MW-183 S/D	
		MW-184 S/D	
		MW-185 S/D	
		MW-186 S/D	

Table 11: Summary	v of S1 and S2	Wells and	COCs Moni	toring the	FWRA TI	Waiver Zone
				0		

Notes:

Source: June 2012 Long-Term Monitoring Plan, prepared by the URS Corporation.

Bold = Concentrations of one or more COCs exceeded the cleanup goal in 2010 through 2015, with concentrations remaining stable or declining over time in most wells but several wells still exhibiting variation over time.

<u>BDA</u>

For the BDA, the soil and groundwater met cleanup standards, although institutional controls for soil are still required since soil was remediated to non-residential standards. Thus, there are no natural attenuation monitoring requirements and no monitoring wells, and therefore groundwater data in this area are not discussed.

Lyondell Trust Areas

WRA

Lyondell installed a slurry wall in 2002 due to persistent concentrations of benzene and TBA concentrations remaining in soil and groundwater after various in-situ remedial treatments. The slurry wall extends downward to the bottom of the S1 layer. The Lyondell Trust monitors the performance of the slurry wall by comparing the benzene and TBA concentration in MI/S1 paired wells inside and outside of the slurry wall boundary. AW-010/AW-10R, EW-001 and MW-034, located within the slurry wall, are paired with AW-038 and AW-012R, which are located outside the slurry wall. The concentrations of benzene and TBA in the monitoring wells inside the slurry wall at AW-010/AW-010R are typically above their respective groundwater cleanup standards (Appendix I; Table I-3); benzene concentrations show an increase from $250 \,\mu g/L$ in AW-010 to $160,000 \,\mu g/L$ in AW-010R between 2011 and 2014, while TBA concentrations increased from 2,700 µg/L in 2011 to 66,000 µg/L in 2014. However, the concentrations at inside slurry wall wells EW-001 and MW-034 have been below detection or below cleanup levels over the last five years. The concentrations of benzene and TBA at well locations outside the slurry wall (AW-038 and AW-012R) have been below detection from 2011 through December 2014. Wells AS-002, AW-003, MW-078 exhibit benzene concentrations consistently well above cleanup goal of 5 µg/L east and outside the slurry wall (Appendix I, Table I-4) with concentrations remaining above 20,000 µg/L in AS-002 and MW-078 over the last five years. A similar observation occurs in MW-152, where TBA consistently exceeds the cleanup goal of 2,200 µg/L µg/L; this well is located outside and side gradient of the slurry wall to the west where TBA fluctuated between 3,500 to 8,000 µg/L over the past five years. The contaminant plumes are being captured by long-term monitoring of the TI and Compliance Zone boundaries for the WRA.

The Lyondell Trust designed TI and Compliance Zone boundaries in 2012 for the WRA based on remaining concentrations of two COCs: benzene and TBA. The monitoring well network for the WRA consists of 26 monitoring wells, including 14 M1/S1 wells, nine S1 wells and three S2 wells. Based on data collected to date, the contaminant plumes at the WRA are present only in the M1/S1 and S1 wells. These are illustrated in Figure I-2 relative to the TI and Compliance Zone boundaries. Figure I-2 shows that the contaminant plumes remain within the TI boundary for the S1 zone. There are no plumes within the S2 zone.

MWA, OTA and Associated Subareas B-53/MW-45 and MW-10

Due to proximity of the MWA, OTA, and OB-53/MW-45 and MW-10 subareas, the plumes in these areas cross the area boundaries. As a result, the Lyondell Trust evaluates the TI and compliance zone boundaries for these four areas together. As shown on Figure I-3, the Trust has defined one TI waiver zone for the MWA, OTA and B-53/MW-45 areas. The wells monitor the M1/S1, S1, and S2 zones. Because there was enough separation between the plumes in the MW-10 Area and the adjacent OTA, the Lyondell Trust defined a separate TI Zone for the MW-10 Area. A single Compliance Zone was established for all four areas.

The contaminant plumes for the MWA, OTA and B-53/MW-45 subareas are primarily located in the M1/S1 and S1 zones and within the TI waiver boundary, as shown in Figure I-3, except for some elevated concentrations of TBA and additional COCs in EMW-44 and EMW-45, which are located beyond the TI waiver zone. In addition, there is a small vinyl chloride plume in the vicinity of wells EMW-059 and MW-036. The plumes in the vicinity of EMW-44, EMW-45, EMW-059 and MW-036 are still within the Compliance Zone. There is a small plume of 1,2-dichloroethane near MW-035, downgradient of the Compliance Zone. These results indicate that the TI and Compliance Zones may have to be expanded for the S1 zone at the MWA/OTA/B-53/MW-45 subareas.

There are small, isolated plumes of benzene and TBA in the S2 zone near well MW-141 in the OTA (Figure I-4). However, both plumes are located within the established TI Zones.

The monitoring well network for the MW-10 subarea consists of 24 wells, including 13 M1/S1 wells, nine S1 wells, and two S2 wells. Figure I-5 shows that the contaminant plumes remain within the TI Zone boundary for the M1/S1 and S1 zone. There are no plumes within the S2 zone. TBA exceeds the cleanup goal in MW-161 a S1 well in the MW-10 subarea with a concentration of 12,000 μ g/L in December 2014. This well has shown a stable trend over the last five years. There do not appear to be any wells south of the MW-161 to monitor the TBA plume in the MW-10 subarea.

EA

The monitoring well network for the EA consists of 37 monitoring wells, including 19 M1/S1 wells, 15 S1 wells, and three S2 wells. Based on data collected to date, the contaminant plumes at the EA are present only in the M1/S1 and S1 wells and are illustrated in Figure I-6 relative to the TI and Compliance Zone boundaries. Figure I-6 shows that the contaminant plumes remain within the TI boundary for the S1 zone. There are no plumes within the S2 zone.

<u>EPA – MW-109</u>

EPA completed remediation of soil to residential and industrial right-of-way standards in 2011. EPA installed three additional monitoring wells in 2011 and after eight rounds of quarterly groundwater sampling, the results indicated additional delineation was warranted. In May 2016, EPA completed delineation of the groundwater plume and installed four additional monitoring wells. Sampling is expected to be begin in the summer of 2016.

Site Inspection

The site inspection took place on 1/12/2016 in two phases. The first phase began in the morning to inspect the remedies at the two parcels owned by EPEC (the BDA and FWRA) and the MW-109 Area overseen by EPA. Site inspection participants included Rajalakshmi Josiam (EPA Region 6 RPM), Audrey Kirtley (TCEQ), Joseph Wiley (Kinder-Morgan, EPEC contractor), and Eric Marsh and Claire Marcussen (Skeo Solutions). The purpose of the inspection was to assess the protectiveness of the remedy. The second phase began in the afternoon to inspect the remedies at the parcels owned by the Lyondell Trust (WRA, MWA, OTA, and EA). Site inspection participants included the same representatives from EPA, TCEQ and Skeo Solutions as well as Angela DeDolph and David Heidlauf (contractors for the Lyondell Trustee).

The morning inspection began at the FWRA, located at the most western extent of the Site. CR126 was paved as part of the OU1 remedy and appeared to be in good condition. Participants met with Mr. Wiley, who provided an overview of the remedies for the EPEC polymers-contaminated areas as well as the current status of the institutional controls for soil and groundwater. The cover of the FWRA was well maintained, all monitoring wells were in good condition, and locked and secured. Participants observed that the soil mixing area was also well vegetated. The area is secured by a fenced, locked gate, with "no trespassing signs" clearly posted. After the FWRA, site participants next visited the BDA next to Turtle Bayou. The area was fenced, secured with a locked gate, and posted with "no trespassing" signs. However, there was evidence that trespassing occurs; torn areas of the fence were repaired. Trespassing is not expected to pose a health concern. Mr. Wiley said that trespassing is primarily by hunters and BDA O&M activities involve repairing fences and removing deer stands constructed by hunters. The BDA is well maintained, with a peripheral grass cover. It is heavily forested in the former dumping area. Participants observed Turtle Bayou, where recent flooding had left large tree limbs on CR126. Routine county maintenance of the road will address the limbs. Drainage appeared to be unobstructed along the side of the road.

Site participants then visited the MW-109 Area and met the property owner living there. The area where groundwater injections took place was covered with vegetation. Wells were secured and locked. Participants also viewed the field behind the home where bioremediation took place. The field appeared to be well vegetated.

The second phase of the inspection began at the WRA, which was enclosed by a tall chain-link fence next to CR126. Site inspection participants observed two locations where wells had been abandoned. The surface was heavily vegetated with grass. All wells were labeled and secured with locks. Site participants then visited the MWA. It included the TRSF, which contains contaminated soils from disposal areas along CR126 and a drum staging area for investigation-derived waste. The vault included two large sumps that are not operational; the wastewater treatment plant has been dismantled. However, the sumps continue to contain leachate, which will be addressed by an upcoming O&M Plan for this area. Participants next visited the OTA and associated subareas, the MW-10 Area and the MW-45 areas. All three areas were enclosed by locked and secured fencing. All monitoring wells were labeled and secured with locks. Participants observed tanks that contain well purge water. Off-site disposal of the water is planned in 2016. Fencing requires routine repairs at all Lyondell Trust parcels due to trespassing from hunters. The participants concluded the inspection at the EA, which was also enclosed by a locked and secured fence. All wells were locked and secured. The area was covered by dense forest.

After the site inspection, Skeo Solutions staff visited the Site's local information repository, Liberty Municipal Library, located at 1710 Sam Houston Avenue in Liberty, Texas. Administrative record documents appeared to be in place, including the Administrative Record for the 2010 and 2012 ESDs on CDs. However, the FYR reports were not identified in the repository.

On January 13, 2016, Skeo Solutions staff reviewed site property records at the Liberty County Clerk Public Records Office, located at 1923 Sam Houston Avenue in Liberty, Texas. The records were reviewed to determine if the groundwater rights have been filed for several of the EPEC-owned properties. Skeo Solutions staff located both warranty deeds and groundwater rights documents.

Appendix E includes a completed Site Inspection Checklist. Appendix G includes photographs of the Site prior to remediation taking place as well as photos taken during the site inspection.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

Question A Summary:

The soil and groundwater remedies are functioning as intended. EPA, EPEC and Lyondell Trust have excavated or treated soils to achieve cleanup goals and groundwater remediation has reached its technological limits such that EPA has established TI Zones for those areas where groundwater cleanup levels have not yet been achieved. TI Zones have been established for the MWA, EA and OTA, and associated subareas for the Lyondell Trust properties as well as EPEC's FWRA.

Based on groundwater monitoring since establishment of the TI Zones in 2012, the groundwater plumes at most areas are present in the M1/S1 or S1 zone. Only one area exhibited a small plume of benzene and TBA in the S2 zone in the OTA. However, both plumes are located within the established TI Zone for this area. The plumes within the S1 zone remain within TI Zone boundaries, with two exceptions. TBA was detected above cleanup goals in EMW-44 and EMW-45, which are located beyond the TI Zone boundary southwest of the OTA but still remains within the Compliance Zone. A similar observation was made for vinyl chloride in EMW-059 and MW-036, which represents a localized plume outside of the TI Zone boundary but within the Compliance Zone. In addition, there is a small plume of 1,2-dichloroethane in the vicinity of MW-035 that is further downgradient of EMW-44 and EMW-045 and outside of the Compliance Zone. These results indicate that the TI and Compliance Zones may have to be expanded for the S1 zone at the MWA/OTA/B-53/MW-45 areas. TBA exceeds the cleanup goal in MW-161 in the MW-10 subarea. This well has shown a stable trend over the last five years. There do not appear to be any wells south of the MW-161 to monitor the TBA plume in the MW-10 subarea. The monitoring well network should be evaluated to determine whether additional monitoring wells are needed in this area. Although ICs are not yet in place for this area, there is no soil exposure and there are no residents living downgradient of this area therefore there is no exposure to groundwater.

EPA concluded in the Site's 2006 AROD that no additional groundwater monitoring was required for the BDA because cleanup goals were met. Thus, a TI Zone was not established and groundwater quality monitoring activities are not warranted for this area. EPA installed additional wells to delineate groundwater contamination at the MW-109 Area downgradient of the residential structure; sampling is expected to begin in the summer of 2016 to determine if NA is occurring and to establish a TI Zone. EPA recently completed sampling at a residential area near the MW-109 area to support a vapor intrusion evaluation. The vapor intrusion evaluation indicated that there is no exposure pathway at the residential property from the MW-109 area. The area has not yet entered into an O&M program.

O&M activities are ongoing at the Site, with a primary focus on long-term groundwater monitoring for areas with established TI Zones and ensuring the different disposal areas remain secured. No unexpected issues have arisen with respect to ongoing O&M activities.

Since the last FYR, a number of institutional controls have been implemented or are in the process of being implemented. As of December 2005, Lyondell acquired all contaminated properties in the WRA, MWA, OTA, and EA, and access to these areas has been restricted such that residential use on these properties does not occur. Groundwater restrictions have not yet been filed with Liberty County property records. The Lyondell Trust plans to submit the Institutional Controls Plan to EPA by the end of the second quarter of 2016. The plan will summarize the nature, maintenance and parcel location of use restrictions and other institutional controls. Once EPA approves the Institutional Controls Plan, the Lyondell Trust will begin filing the restrictions with Liberty County property records.

EPEC is currently filing restrictive covenants on its parcels, as required by the 2006 AROD and the Institutional Controls Plan. EPEC has completed the filing of groundwater restrictions on most of the properties it does not own that are potentially impacted by groundwater contamination. EPEC is in the process of filing groundwater use restrictions on one additional parcel. EPEC continues to work with the owner of another parcel to establish a restriction on water use.

EPA and Liberty County signed an MOA in 2011 for the County to operate and maintain CR126. Since CR126 serves as a cap over any remaining residual soil contamination, the County must notify EPA any time extensive road repairs are warranted or when there is a need to dig through CR126. The County must submit roadwork repair and dig plans to the EPA for review and approval to make sure activities do not make residual contamination available for exposure.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and RAOs used at the time of the remedy selection still valid?

Question B Summary:

Changes in Standards and To-be-Considered Values (TBCs)

Since the last FYR, the 2012 ESDs were published for both the EPEC- and Lyondell Trust-owned areas to include updates to the groundwater cleanup levels. Maximum contaminant levels (MCLs) were selected as the cleanup levels for the groundwater COCs. However, in the absence of MCLs, health-based values were identified. The MCLs for site COCs have not changed since the 2012 ESDs were issued for the EPEC- and Lyondell Trust-owned areas (Appendix H). To determine if any toxicity values may have changed that could impact cleanup goals for the COCs without MCLs, health-based cleanup goals are evaluated in the next section.

Changes in Toxicity and Other Contaminant Characteristics

MCLs were not established for four groundwater COCs (1,1-dichloroethane, acetone, naphthalene and TBA). Therefore, EPA and TCEQ selected the Texas Risk Reduction Program (TRRP) Tier 1 protective concentration limits (PCLs) as the health-based cleanup goals for groundwater in the 2012 ESDs. To determine if the cleanup goals for these four COCs remain valid, the cleanup goals were compared to EPA's 2016 tapwater regional screening levels, or RSLs (Appendix J). Based on a screening-level risk evaluation, the cancer risk associated

with the 2012 ESD cleanup goals for 1,1-dichloroethane and naphthalene exceeds the upper bound of EPA's cancer risk management range of 1×10^{-6} to 1×10^{-4} . The cleanup goals for 1,1-dichloroethane, acetone and naphthalene exceed EPA's target noncancer threshold of 1. EPA has not established toxicity criteria for TBA. The cleanup goal established by TCEQ as the Tier 1 PCL was compared to the most current PCL; the value has not changed. These results indicate that the cleanup goals for 1,1-dichloroethane, acetone, and naphthalene may not be stringent enough for monitoring of the Compliance Zones. EPA has established toxicity values for acetone. Thus, the cleanup goal should be evaluated. In addition, EPA's RSLs for 1,1-dichloroethane and naphthalene rely on provisional toxicity values obtained from the California Environmental Protection Agency (CalEPA) as EPA has not finalized toxicity values for these two COCs. Based on these results, the cleanup goals for 1,1-dichloroethane, acetone and naphthalene should be evaluated to determine if the cleanup goals remain protective.

Changes in Risk Assessment Methods

Historically, the vapor intrusion pathway has not been quantitatively evaluated in EPA risk assessments. EPA finalized vapor intrusion guidance in 2015. It requires evaluation of multiple lines of evidence to confirm the relative significance of this pathway and whether any response action is warranted. Per the guidance, if it can be shown that VOC-contaminated soil and/or groundwater sources are or will come within 100 feet of inhabited structures, screening this exposure pathway is generally warranted. Most residences at the Site are upgradient of contaminated zones and there are no residences within 100 feet of the groundwater plumes. The closest residence to the MW-109 Area is about 200 feet upgradient of the localized impacted area, suggesting that vapor intrusion is unlikely to pose a concern. The well closest to the residence, MW-191, contained only trace levels of phenol and bis(2-ethylhexyl)phthalate; these compounds are not considered by EPA to be volatile enough to pose a vapor intrusion concern. To confirm this conclusion, EPA recently completed sampling at a residential area near the MW-109 area to support a vapor intrusion evaluation. The vapor intrusion evaluation indicated that there is no exposure pathway at the residential property from the MW-109 area.

Changes in Exposure Pathways

There have been no changes in site conditions that would suggest the presence of new exposure pathways.

Expected Progress toward Meeting RAOs

EPA approved the TI Zones for groundwater plumes in 2012. Therefore, long-term monitoring will be reviewed over the next FYR period to determine if the remedy progressing as expected toward meeting RAOs.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

No other information has come to light that could call into question the protectiveness of the remedy.

VI. ISSUES/RECOMMENDATIONS

Issues/Recommendations

OU(s) without Issues/Recommendations Identified in the Five-Year Review:

OU1

Issues and Recommendations Identified in the Five-Year Review:

OU(s):	Issue Category: Remedy Performance					
OU2	Issue: The groundwater protection standards for 1,1-dichloroethane, acetone and naphthalene may not be stringent enough for monitoring the TI and Compliance Zones.					
	Recommendation: Evaluate whether groundwater protection standards should be revised for 1,1-dichloroethane, acetone and naphthalene to reflect current toxicity values. If so, determine if the TI and Compliance Zones need to be revised.					
Affect Current Protectiveness	Affect Future ProtectivenessParty ResponsibleOversight PartyMilestone Date					
No	Yes	EPA	EPA/State	6/11/2017		

OU(s):	Issue Category: Remedy Performance				
OU2	Issue: Contamination has been detected above cleanup goals outside of the Compliance Zone southwest of the Main Waste Area (MWA) and Office Trailer Area (OTA) in well MW-035.				
	Recommendation: Evaluate whether the TI and Compliance Zones requires expansion in the vicinity of well MW-035.				
Affect Current Protectiveness	Affect Future ProtectivenessParty ResponsibleOversight PartyMilestone Date				
No	Yes	PRP	EPA/State	6/11/2017	

OU(s):	Issue Category: Remedy Performance					
OU2	Issue: TBA concentrations appear stable but remain well above the cleanup goal of $2,200 \mu g/L$ in MW-161 in the MW-10 subarea. However, there are no wells south of this well to monitor whether this contaminant remains below the cleanup goal in the Compliance Zone.					
	Recommendation: Install a well south of MW-161 to evaluate whether TE the MW-10 subarea remains below the cleanup goal within the Compliance					
Affect Current Protectiveness	Affect FuturePartyOversight PartyMilestone DateProtectivenessResponsible					
No	Yes	PRP	EPA/State	6/11/2017		

OU(s): OU2	Issue Category: Institutional Controls				
	Issue: Not all institutional controls have been implemented by the potentially responsible parties (PRPs) and Trustee as outlined in site decision documents.				
	Recommendation: Complete implementation of remaining institutional controls at all parcels impacted by the Site.				
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date	
No	Yes	PRP	EPA/State	6/11/2017	

OU(s): OU2	Issue Category: Monitoring				
	Issue: A technical impracticability waiver for the MW-109 Area needs to be established based on the delineated groundwater plume.				
	Recommendation: Establish a TI waiver once the groundwater contamination delineation is completed.				
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date	
No	Yes	EPA	EPA	12/1/2016	

OTHER FINDINGS

These recommendations, identified during the FYR, do not affect current and/or future protectiveness:

- Evaluate Site groundwater data relative to the depths of residential wells and determine if any residential wells require resampling.
- Include a copy of the 2011 and 2016 FYRs in the Site's local information repository.
- Consider documenting the change of the soil and groundwater remedy for the BDA in a decision document.

VII. PROTECTIVNESS STATEMENT

Protectiveness Statements

Operable Unit:	Protectiveness Determination:
OU1	Protective

Protectiveness Statement:

The OU1 remedy is protective of human health and the environment. The most contaminated soils have been removed and contained within a TRSF. Institutional controls are in place to prevent exposure to any residual contaminated soils remaining under CR126.

Operable Unit:	Protectiveness Determination:
OU2	Short-term Protective

Protectiveness Statement:

The remedy at OU2 currently protects human health and the environment. Soil has been remediated, groundwater has been treated, and groundwater is being monitored at the FWRA, BDA, WRA, EA, MWA and OTA (including the OTA subareas). For the remedy to be protective over the long term, the following actions need to be taken at the MW-109 area: establish the TI waiver. In addition, evaluate whether the TI and Compliance Zones need to be revised southwest of the MWA and OTA and complete the implementation of remaining institutional controls at all parcels impacted by the Site.

Sitewide Protectiveness Statement

Protectiveness Determination: Short-term Protective

Protectiveness Statement:

The OU1 remedy is protective of human health and the environment. The most contaminated soils have been removed and contained within a temporary RCRA storage facility and institutional controls are in place to prevent exposure to any residual contaminated soils remaining under CR126. The OU2 remedy currently protects human health and the environment because soil has been remediated, groundwater has been treated, and groundwater is being monitored at the FWRA, BDA, WRA, EA, MWA and OTA (including the OTA subareas). For the remedy to be protective over the long term, the following actions need to be taken at the MW-109 area: establish the TI waiver. In addition, evaluate whether the TI and Compliance Zones need to be revised southwest of the MWA and OTA and complete the implementation of remaining institutional controls at all parcels impacted by the Site.

VII. NEXT REVIEW

The next FYR Report for the Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund site is required five years from the completion date of this review.

APPENDIX A – REFERENCE LIST

Amended Record of Decision: Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site, Liberty County, Texas. United States Environmental Protection Agency Region 6. April 30, 1998.

Amended Record of Decision: Petro-Chemical Systems Inc. (Turtle Bayou) Superfund Site, Liberty County, Texas. United States Environmental Protection Agency Region 6. September 22, 2006.

Explanation of Significant Differences, Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site. September 23, 2010.

Explanation of Significant Differences, Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site: EPEC Polymers Inc. Property (CR-126 West Area). August 17, 2012.

Explanation of Significant Differences, Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site: Lyondell Environmental Custodial Trust Properties. August 22, 2012.

First Five-Year Review Report for Petro-Chemical Systems Inc. (Turtle Bayou) Site, Liberty County. October 23, 2000.

Institutional Controls Plan for CR 126 West Area and Bayou Disposal Area Turtle Bayou Superfund Site. Prepared by ERM. February 2007.

Long-term Monitoring Plan for the CR 126 West Area and Bayou Disposal Area. Prepared by URS. June 2012.

Long-term Monitoring Plan for the Lyondell Environmental Custodial Trust Properties. Prepared by Ramboll/Environ. January 2016.

O&M Plan for the West Road Area Slurry Wall. Lyondell Environmental Custodial Trust Properties. Prepared by Ramboll/Environ. February 2016.

NPL Site Narrative for Petro-Chemical Systems, (Turtle Bayou). Federal Register Notice, June 10, 1986

NPL Fact Sheet, Petro-Chemical Systems, Inc. (Turtle Bayou) Texas. Last update July 2015.

Preliminary Close Out Report, Petro-Chemical Systems Inc. (Turtle Bayou) Superfund Site, Liberty County, Texas. September 2010.

Record of Decision, Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site, Liberty County, Texas. United States Environmental Protection Agency Region 6. March 27, 1987.

Record of Decision: Petro-Chemical Systems Inc. (Turtle Bayou) Superfund Site, Liberty County, Texas. United States Environmental Protection Agency Region 6. September 6, 1991.

Second Five-Year Review Report for Petro-Chemical Systems Inc. (Turtle Bayou) Site, Liberty County, Liberty, Texas. September 22, 2006.

Superfund Site Progress Profile, Petro-Chemical Systems, Inc. (Turtle Bayou). Available online at: <u>http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0602957&msspp=medL</u>. Last update on October 1, 2015.

Third Five-Year Review Report for Petro-Chemical Systems Inc. (Turtle Bayou) Site, Liberty County, Liberty, Texas. September 16, 2011.
APPENDIX B – INSTITUTIONAL CONTROL FIGURES







Figure B-2: Institutional Controls Map for EPEC-BDA Properties

APPENDIX C – SITE BACKGROUND

C-1. Physical Characteristics

The 500-acre area is located in rural Liberty County, 15 miles southeast of Liberty, Texas. The Site is 6 miles north of Interstate 10 along Farm to Market Road 563 (FM 563), which borders the Site to the west. County Road 126 (CR126 – previously identified as Frontier Park Road) provides access to the Site from FM 563. CR126 traverses the middle of the Site, spanning a total length of 2.5 miles heading east from FM 563, and extends 0.5 miles beyond Turtle Bayou (Figure 1). Turtle Bayou is a tributary to Lake Anahuac. It forms the eastern boundary of the Site. The eastern end of the Site falls within the 100-year floodplain along the Turtle Bayou tributary.

Although the Site is mostly flat, local surface water drains across the Site from northwest to southeast, and eventually into Turtle Bayou. Two water-bearing zones are located in the upper 100 feet of the subsurface.

The Site's subsurface conditions create challenges for remediation of contaminated soil and groundwater. There are five different zones. The uppermost clay unit is designated Cl and overlies a silt unit, the Ml and a sand zone (S1 zone). The Ml silt and S1 zones are about 12 and 29 feet below grade under the entire site. The second clay layer (C2) lies at the base of the S1 zone and varies from 2 to more than 10 feet thick isolating the first sand layer zone (S1) sand from the second sand layer zone (S2 zone) in which local supply wells have typically been installed. The overall clayey and silty nature of the S1 sand across the Site poses challenges to removing or in-situ treatment of contaminants because the presence of clays restricts contaminant movement and contaminants tend to adsorb to clay and trap non-aqueous phase waste liquids (NAPLs).

There are residences and drinking water wells within a 1-mile radius of the Site along FM 563 and CR126. However, drinking water wells currently used on site are screened in the deeper non-contaminated aquifer at depths of approximately 180 feet or more.

C-2. Land and Resource Use

Land uses in the surrounding area include cropland, pasture, range, forest and small rural communities. In 1971, the site owner filed an application for a commercial industrial waste disposal permit with the State of Texas. However, the permit application was withdrawn due to legal action in 1974. After 1974, the owner subdivided the Site into 5-acre and 15-acre plots and sold them for residential development. Residential use of the Site has been continuous since 1974, except when remedial activities required temporary relocation of residents. No residents live on any of the identified disposal areas. However, seven families live next to waste disposal areas (the FWRA, EA and BDA). Shallow water supply wells in the vicinity of remediation areas have been plugged and abandoned.

The shallow aquifer is not currently in use as a source of drinking water on site. However, the shallow aquifer could be used as a source of drinking water in the future and is considered a class 2-B aquifer by the State of Texas. A class 2-B aquifer has water quality such that it is a usable aquifer but that for other reasons (e.g., low water yield capacity) is not currently used.

C-3. History of Contamination

Unpermitted waste disposal may have started as early as the late 1960s. The Texas Water Quality Board has documented records of waste disposal as early as 1971; records indicate waste oils from nearby petroleum refining activities were disposed of into unlined pits and on Frontier Park Road (CR126) for dust suppression. Since the Site was never an authorized waste disposal facility, the exact nature of disposal activities at the Site is uncertain. However, it appears that the waste was simply dumped from trucks at numerous locations. In some areas, it appears that the wastes were tilled into the soil. Disposal activities resulted in the release of liquid wastes that contaminated soil and groundwater with VOCs and SVOCs.

C-4. Initial Response

Following the State's revocation of the industrial waste disposal permit in 1974, EPA and TCEQ conducted preliminary sampling and found several PAHs in the former disposal pits along CR126. In May 1984, TCEQ requested the inclusion of the Site on EPA's National Priorities List (NPL). EPA proposed the Site for inclusion on the NPL on October 15, 1984, and listed the Site on the NPL on May 20, 1986. EPA completed a removal action, which included posting warning signs and installing a fence around the Site's MWA, between May 12 and 16, 1986.

APPENDIX D – SITE CHRONOLOGY AND REMEDY HISTORY

Table D-1: Site Chronology

Date	Event
Unpermitted waste disposal may have begun at the Site	1960s
Texas Water Quality Board documents waste disposal at the Site; PRP filed for a	1971
commercial waste disposal permit	
PRP withdrew the waste disposal permit application, subdivided the Site into residential	1974
parcels and sold the parcels for redevelopment.	
TCEQ requested the Site's inclusion on the NPL	May 1984
EPA proposed the Site for listing on the NPL	October 15, 1984
EPA conducted a removal action at the MWA	May 16, 1986
EPA listed the Site on the NPL	May 20, 1986
The Texas Water Commission (TWC) and EPA completed the RI/FS for the Frontier	September 1986
Road Area (also known as the CR126 Area or OU1)	
EPA issued the OU1 ROD	March 27, 1987
EPA and TWC began the OU1 remedial design	June 5, 1987
EPA and TWC completed the OU1 remedial design	October 30, 1987
EPA and TWC began the remedial action for OU1	January 25, 1988
EPA and TWC completed the remedial for OU1	March 1, 1989
EPA and TWC completed the OU2 RI	November 1990
EPA and TWC completed the FS for OU2; EPA issued an Administrative Order on	March 1991
Consent for the PRP to conduct a supplemental RI/FS at OU2	
The PRP completed the supplemental RI/FS for OU2	August 1991
EPA issued the ROD for OU2 to address five areas – the WRA, MWA, OTA, EA and	September 6, 1991
BDA	
PRP began OU2 remedial design	September 25, 1992
EPA issued a UAO for site PRPs – the Lyondell Chemical Company and Atlantic	December 22, 1993
Richfield Company – to complete the remedial design for OU2 at the Lyondell properties	
(the WRA, MWA, OTA and EA)	
PRP begins OU2 remedial action	January 18, 1996
EPA issued OU2 AROD for addressing cleanup criteria for benzene in soils and	April 30, 1998
enhancing remedy components for soil and groundwater	
PRP completed OU2 remedial design	May 22, 1998
EPA entered into a Consent Decree with site PRPs; superseded the 1993 UAO and	December 8, 1998
required PRPs to address contamination in the WRA, MWA, OTA and EA; EPEC to	
address contamination in the FWRA and BDA.	A
EPA and TCEQ identified contamination at the FWRA	August 1999
EPA signed Site's first FYR.	September 8, 2000
PRPs complete active remedial action and start two-year monitoring period for UU2	July 27, 2005
EPA signed Site's second FYR and issued second OU_2 AROD to include remediation at MW_100 area and documenting the TL determination for particular of shellow.	September 22, 2006
mw-109 area and documenting the 11 determination for portions of snahow	
remedies	
PRP completes remedial design for CR126 West Area and OU2 RDA	February 28, 2007
EPA enters into a Consent Decree with EPEC to conduct remedial design and remedial	1 cordary 20, 2007
action at the CR126 West Area and OU2 BDA	August 21, 2007
PRP completes remedial action for the CR126 West Area	September 2008
EPA entered into interagency agreement with USACE to conduct the remedial design	2009
and remedial action for the MW-109 Area	2007
USACE completes supplemental RI/FS at MW-109 Area	February 25. 2010
USACE began soil remedial action at MW-109 Area	2010
Lyondell Environmental Custodial Trust formed	May 3. 2010
EPA issued ESD for OU2 to include remedial action for the MW-109 Area	September 23. 2010
EPA issued Preliminary Close-out Report for construction completion at the Site	September 30, 2010

Date	Event
USACE completed soil remedial action for the MW-109 Area	March 9, 2011
EPA signed Site's third FYR	September 16, 2011
EPA finalized TI waiver zone document for EPEC's CR126 West Area after a two-year	August 17, 2012
transitional monitoring period and signed the ESD	
EPA finalized TI waiver zone documents for Lyondell Trust sites (the WRA, MWA,	August 22, 2012
OTA and EA) after a two-year transitional monitoring period and signed the ESD	

Table D-2: Summary of OU2 Decision Documents, Remedial Components, and RAOs

Source Area	Decision Document	Remedial Components	RAOs
Lyondell • WRA • OTA • MWA • EA <u>EPEC</u> • BDA	ROD 09/06/1991	 Dismantle RCRA landfill/vault Soil: SVE/engineered cap/site restoration Groundwater: air injection/slurry wall/monitoring Stormwater controls 	 Prevent current or future exposure to contamination in soil.
Lyondell • WRA • OTA • MWA • EA <u>EPEC</u> • BDA	AROD 04/30/1998	 Modified benzene cleanup goal Soil hot spots: added thermal desorption/excavation and on-site biotreatment and off-site disposal/treatment Soil: added a living cap, bioventing, aqueous phase bioremediation Groundwater: added in-situ bioremediation and MNA Soil and groundwater institutional controls 	 Eliminate the potential for soils to act as a continuing source of groundwater contamination. Restore shallow groundwater to its beneficial use as a potential source of drinking water.
Lyondell • WRA • OTA • MWA • EA <u>EPEC</u> • BDA • FWRA MW-109 Area	AROD 09/22/2006	 Identified FWRA requiring soil and groundwater remediation using ISCO Groundwater: added TI waivers for the WRA, MWA, OTA (including the Central B-53 Area and MW-45 Area within OTA), EA (North and South), as well as in the FWRA Presented MW-109 Area information Amended groundwater and soil cleanup criteria Amended remedy for BDA for limited excavation and off-site disposal of soil Amended TRSF remedy to engineering controls and groundwater monitoring Contingency remedies if TI waiver zones violated Soil and groundwater institutional controls 	 Maintain stable or declining contaminated groundwater plumes and prevent exposure to contaminants exceeding soil and groundwater cleanup criteria for areas designated as TI waiver zones. Protect the groundwater from degradation from site contaminants, thereby maintaining its beneficial use as a potential future source of drinking water in areas outside the TI waiver zones. Prevent direct contact to soil in the MWA and WRA. Prevent contaminant migration from soil to groundwater. Reduce soil contaminant concentrations based on current land uses.
MW-109 Area	ESD 09/23/2010	 Soil: ISCO Groundwater: monitoring Soil and groundwater institutional controls 	• Restore shallow groundwater to its beneficial use as a potential source of drinking water.
Lyondell • WRA	ESD 08/22/2012	• Establish the final boundaries of the TI waiver zones for shallow groundwater	Maintain stable or declining contaminated groundwater plumes

Source Area	Decision Document	Remedial Components	RAOs
• MWA • OTA • EA			and prevent exposure to contaminants exceeding soil and groundwater cleanup criteria for
EPEC • FRWA	ESD 08/22/2012	• Establish the final boundaries of the TI waiver zones for shallow groundwater	 areas designated as TI waiver zones. Protect the groundwater from degradation from site contaminants, thereby maintaining its beneficial use as a potential future source of drinking water in areas outside the TI waiver zones.

APPENDIX E – SITE INSPECTION CHECKLIST

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST				
I. SITE INF	ORMATION			
Site Name: Petro-Chemical Systems, Inc. (Turtle Bayou)	Date of Inspection: 01/12/2016			
Location and Region: Liberty County, Texas – EPA Region 6 EPA ID: TXD980873350				
Agency, Office or Company Leading the Five-Year Review: EPAWeather/Temperature: Sunny/40 degrees Fahrenheit				
Remedy Includes: (Check all that apply)				
Attachments: Inspection team roster attached	Site map attached			
II. INTERVIEWS	(check all that apply)			
1. O&M Site Manager Joseph Wiley Project Manager (Kinder Morgan Manager Man				
Interviewed \square at site \square at office \boxtimes by email Phone:				
Problems, suggestions Report attached: Interview question responses are summarized in Section 6.6.				
2. O&M Staff <u>Angela DeDolph</u>				
Name	Little Date			
Interviewed i at site i at office i by phone Phone:				
Problems/suggestions [] Report attached:				

3. Local Regulatory Authorities and Response Agencies (i.e., state and tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of					
deeds, or other city and county offices).	Fill in all that apply	•			
Agency <u>TCEQ</u>					
Contact	LDEQ Si	te Manager			
Name Problems/suggestions	Title ort attached:	Date	Phone No.		
Agency Contact					
Name	Title	Date	Phone No.		
Problems/suggestions 🗌 Repo	ort attached:				
Agency					
Contact	T '(1)		Diana Na		
Name Problems/suggestions \Box Repo	I itle	Date	Phone No.		
Agency Contact					
Name	Title	Date	Phone No.		
Problems/suggestions 🗌 Repo	ort attached:				
Agency					
Contact	Title	Data	Dhoma No		
Problems/suggestions \square Repo	ort attached:	Date	Phone No.		
4. Other Interviews (optional)	Report attached:	Interview question response	nses are summarized in		
Section 6.6.					
III. ON-SITE DOCUM	ENTS AND RECO	RDS VERIFIED (chec	k all that apply)		
1. O&M Documents					
O&M manual	Readily available	Up to date	N/A		
As-built drawings	Readily available	Up to date	N/A		
Maintenance logs	Readily available	Up to date	N/A		
Remarks:					
2. Site-Specific Health and Sa	fety Plan	Readily available	\Box Up to date \Box N/A		
Contingency plan/emergency respo	\Box Contingency plan/emergency response plan \Box Readily available \boxtimes Up to date \Box N/A				
Remarks: Located at Kinder Morgan and Ramboll Environ offices.					
3. O&M and OSHA Training Records					
Remarks: Not verified.					

4. Permits and Service Ag	reements			
Air discharge permit		Readily available	Up to date	N/A
Effluent discharge		Readily available	Up to date	N/A
🗌 Waste disposal, POTW		Readily available	Up to date	N/A
Other permits:		Readily available	Up to date	N/A
Remarks:				
5. Gas Generation Record	s	Readily available	Up to date	N/A
Remarks:				
6. Settlement Monument I	Records	Readily available	Up to date	N/A
Remarks:				
7. Groundwater Monitori	ng Records	Readily available	Up to date	N/A
Remarks:				
8. Leachate Extraction Re	cords	Readily available	Up to date	N/A
Remarks:				
9. Discharge Compliance	Records			
🗌 Air	Readily available	Up to date	\boxtimes N	J/A
Water (effluent)	Readily available	Up to date	\boxtimes N	J/A
Remarks:				
10. Daily Access/Security L	ogs	Readily available	Up to date	N/A
Remarks: <u>All site guests are requin</u> <u>locked fences and gates prohibit and remediated. Groundwater remains</u>	red to sign in at the mair ccess to all waste areas e contaminated and is loc	n Entergy office.Daily ac except for the MW-109 / rated near a residence.	ccess logs are not : Area where soils h	required; have been
	IV. O&M	COSTS		
1. O&M Organization				
State in-house	C	Contractor for state		
PRP in-house		Contractor for PRP		
Federal facility in-house	Γ	Contractor for Federa	l facility	
⊠ Other				

2. O&M Cost Records				
🛛 Readily available		Up to date		
Funding mechanism/agreer	nent in place	Unavailable		
Original O&M cost estimate:	🔀 Breakde	own attached		
Тс	otal annual cost by	year for review period if a	vailable	
From:	То:		Breakdown attached	
Date	Date	Total cost		
From:	То:		Breakdown attached	
Date	Date	Total cost		
From:	То:		Breakdown attached	
Date	Date	Total cost		
From:	То:		Breakdown attached	
Date	Date	Total cost		
From:	To:		Breakdown attached	
Date	Date	Total cost		
3. Unanticipated or Unu	sually High O&I	M Costs during Review Pe	eriod	
Describe costs and reas	sons:			
V. ACCESS A	ND INSTITUTI	ONAL CONTROLS	Applicable 🗌 N/A	
A. Fencing				
1. Fencing Damaged \Box Location shown on site map \boxtimes Gates secured \Box N/A				
Remarks: All fencing appears to be in good condition.				
B. Other Access Restrictions				
1. Signs and Other Security Measures □ Location shown on site map □ N/A				
Remarks: Fencing and locking gates restrict site access.				
C. Institutional Controls (ICs)				

1. Implementation and Enforcement	
Site conditions imply ICs not properly implemented	Yes 🛛 No 🗌 N/A
Site conditions imply ICs not being fully enforced	Yes 🛛 No 🗌 N/A
Type of monitoring (e.g., self-reporting, drive by):	
Frequency:	
Responsible party/agency:	
Contact	
Name Title	Date Phone no.
Reporting is up to date	Yes No N/A
Reports are verified by the lead agency	Yes No N/A
Specific requirements in deed or decision documents have been met	Yes No N/A
Violations have been reported	Yes No N/A
Other problems or suggestions: 🛛 Report attached	
2. Adequacy □ ICs are adequate ⊠ ICs are Remarks: Not all institutional controls have been filed with the Liberty C Section 3.3 for more detail.	inadequate IN/A County Clerk Public Records Office. See
D. General	
1. Vandalism/Trespassing Location shown on site map] No vandalism evident
Remarks:	
Remarks: 2. Land Use Changes On Site	
Remarks:	f the Site.
Remarks:	f the Site.
Remarks:	f the Site. f the Site. DNS
Remarks:	f the Site. f the Site.
Remarks:	<u>f the Site.</u> <u>f the Site.</u> DNS ☐ N/A
Remarks:	f the Site. f the Site. NS Roads adequate \Box N/A
Remarks:	f the Site. f the Site. NS Roads adequate N/A
Remarks:	f the Site. f the Site. NS NA
Remarks:	f the Site. f the Site. NS Cable N/A
Remarks:	f the Site. f the Site. Ithe Site. Ithe Site. Ithe Site. Item Settlement not avident
Remarks:	f the Site. f the Site. Image: Settlement not evident
Remarks:	f the Site. f the Site. f the Site. NS able N/A Settlement not evident Depth:

2. Cracks	Location shown on site map	Cracking not evident
Lengths:	Widths:	Depths:
Remarks:		
3. Erosion	Location shown on site map	Erosion not evident
Arial extent:		Depth:
Remarks:		
4. Holes	Location shown on site map	Holes not evident
Arial extent:		Depth:
Remarks:		
5. Vegetative Cover	Grass	Cover properly established
□ No signs of stress	Trees/shrubs (indicate size and lo	cations on a diagram)
Remarks:		
6. Alternative Cover (e.g., a	armored rock, concrete)	N/A
Remarks:		
7. Bulges	Location shown on site map	Bulges not evident
Arial extent:		Height:
Remarks:		
8. Wet Areas/Water Damage	Wet areas/water damage not e	vident
⊠ Wet areas	Location shown on site map	Arial extent:
Ponding	Location shown on site map	Arial extent:
Seeps	Location shown on site map	Arial extent:
Soft subgrade	Location shown on site map	Arial extent:
Remarks: <u>Wet area at the bottom ea</u> erosion evident.	dge of the landfill were evident due to he	eavy rains in the area, however, no
9. Slope Instability	Slides Loc	cation shown on site map
No evidence of slope instability		
Arial extent:		
Remarks:		
B. Benches Applie	cable 🕅 N/A	
(Horizontally constructed mounds of to slow down the velocity of surface	earth placed across a steep landfill side runoff and intercept and convey the run	e slope to interrupt the slope in order noff to a lined channel.)
1. Flows Bypass Bench	Location shown on site map	N/A or okay
Remarks:		
2. Bench Breached	Location shown on site map	N/A or okay
Remarks:		

3. Bench Overtopped	Location shown	on site map	N/A	or okay	
Remarks:					
C. Letdown Channels	Applicable 🛛 N	I/A			
1. Settlement (Low spots)	Location shown	on site map	🗌 No	evidence of settlement	
Arial extent:			Depth:		
Remarks:					
2. Material Degradation	Location shown	on site map	🗌 No	evidence of degradation	
Material type:			Arial e	xtent:	
Remarks:					
3. Erosion	Location shown	on site map	🗌 No	evidence of erosion	
Arial extent:			Depth:		
Remarks:					
4. Undercutting	Location shown	on site map	🗌 No	evidence of undercutting	
Arial extent:			Depth:		
Remarks:					
5. Obstructions	Туре:		🗌 No	obstructions	
Location shown on site map Arial extent:					
Size:					
Remarks:					
6. Excessive Vegetative G	rowth Ty	pe:			
□ No evidence of excessive growth					
Vegetation in channels does n	ot obstruct flow				
Location shown on site map	Aı	ial extent:	_		
Remarks:					
D. Cover Penetrations	Applicable N	I/A			
1. Gas Vents	Active		Pass:	ive	
Properly secured/locked	Functioning	Routinely	sampled	Good condition	
Evidence of leakage at penetra	ation	Needs mai	ntenance	N/A	
Remarks:					
2. Gas Monitoring Probes	8				
Properly secured/locked	Functioning	Routinely	sampled	Good condition	
Evidence of leakage at penetra	ation	Needs mai	ntenance	N/A	
Remarks:					

3. Monitoring Wells (within surfa	ce area of landfill	l)			
Properly secured/locked] Functioning	Routinely sampled	Good condition		
Evidence of leakage at penetration		Needs maintenance	N/A		
Remarks:					
4. Extraction Wells Leachate					
Properly secured/locked	Functioning	Routinely sampled	Good condition		
Evidence of leakage at penetration		Needs maintenance	N/A		
Remarks: <u>Two sumps remaining on the la</u> <u>O&M activities for this area.</u>	andfill surface col	llect leachate, which is pur	ped out as part of the		
5. Settlement Monuments	Located	Routinely surveyed	N/A		
Remarks:					
E. Gas Collection and Treatment	Applicable	N/A			
1. Gas Treatment Facilities					
Flaring	Thermal destruc	ction	Collection for reuse		
Good condition	Needs maintena	ince			
Remarks:					
2. Gas Collection Wells, Manifold	ds and Piping				
Good condition] Needs maintena	ince			
Remarks:					
3. Gas Monitoring Facilities (e.g.	., gas monitoring	of adjacent homes or buildi	ngs)		
Good condition	Needs maintena	ince N/A			
Remarks:					
F. Cover Drainage Layer	Applicable	N/A			
1. Outlet Pipes Inspected] Functioning	N/A			
Remarks:					
2. Outlet Rock Inspected	Functioning	N/A			
Remarks:					
G. Detention/Sedimentation Ponds Applicable X/A					
1. Siltation Area extent:	D	Depth:	N/A		
Siltation not evident					
Remarks:					
2. Erosion Area extent:	D	Depth:			
Erosion not evident					
Remarks:					
3. Outlet Works Function	ing	[] N/A		
Remarks:					

4. Dam F	unctioning	N/A		
Remarks:				
H. Retaining Walls	Applicable N/A			
1. Deformations	Location shown on site map	Deformation not evident		
Horizontal displacement:	Vertical displacement:			
Rotational displacement:				
Remarks:				
2. Degradation	Location shown on site map	Degradation not evident		
Remarks:				
I. Perimeter Ditches/Off-Site Dis	scharge 🛛 Applicable] N/A		
1. Siltation	Location shown on site map	Siltation not evident		
Area extent:		Depth:		
Remarks:				
2. Vegetative Growth	Location shown on site map	N/A		
Vegetation does not impede fl	OW			
Area extent:		Туре:		
Remarks:				
3. Erosion	Location shown on site map	Erosion not evident		
Area extent:		Depth:		
Remarks:				
4. Discharge Structure	Functioning	X N/A		
Remarks:				
VIII. VERTICAL BARRIER W	ALLS Applicable] N/A		
1. Settlement	⊠ Location shown on site map	Settlement not evident		
Area extent:		Depth:		
Remarks:				
2. Performance Monitoring	Type of monitoring: <u>Performance</u>			
Performance not monitored				
Frequency:		Evidence of breaching		
Head differential:				
Remarks:				
IX. GROUNDWATER/SURFACE WATER REMEDIES Applicable N/A				
A. Groundwater Extraction Wel	lls, Pumps and Pipelines	Applicable 🛛 N/A		

1. Pumps, Wellhead Pl	lumbing and Electrical		
Good condition	\square All required wells properly operating \square Needs maintenance \square N/A		
Remarks:			
2. Extraction	on System Pipelines, Valves, Valve Boxes and Other Appurtenances		
Good condition	Needs maintenance		
Remarks:			
3. Spare Parts and I	Equipment		
Readily available	Good condition Requires upgrade Needs to be provided		
Remarks:			
B. Surface Water Collection	m Structures, Pumps and Pipelines		
1. Collection Structure	es, Pumps and Electrical		
Good condition	Needs maintenance		
Remarks:			
2. Surface Water Colle	ection System Pipelines, Valves, Valve Boxes and Other Appurtenances		
Good condition	Needs maintenance		
Remarks:			
3. Spare Parts and I	Equipment		
Readily available	Good condition Requires upgrade Needs to be provided		
Remarks:			
C. Treatment System	\square Applicable \square N/A		
1. Treatment Train (ch	neck components that apply)		
Metals removal	Oil/water separation Bioremediation		
Air stripping Carbon adsorbers			
Filters:			
Additive (e.g., chelation	agent, flocculent):		
Others:			
Good condition	Needs maintenance		
Sampling ports properly	marked and functional		
Sampling/maintenance l	og displayed and up to date		
Equipment properly iden	ntified		
Quantity of groundwater	r treated annually:		
Quantity of surface wate	er treated annually:		
Remarks: <u>Groundwater rem</u> completed and the remedy i	edy included in-situ bioremediation and extraction. The remedial actions are is now in long-term monitoring.		

2. Electrical Enclosures and Panels (properly rated and functional)
N/A Good condition Needs maintenance
Remarks:
3. Tanks, Vaults, Storage Vessels
□ N/A □ Good condition □ Proper secondary containment □ Needs maintenance
Remarks:
4. Discharge Structure and Appurtenances
□ N/A □ Good condition □ Needs maintenance
Remarks:
5. Treatment Building(s)
N/A Good condition (esp. roof and doorways) Needs repair
Chemicals and equipment properly stored
Remarks:
6. Monitoring Wells (pump and treatment remedy)
Properly secured/lockedFunctioningRoutinely sampledGood condition
All required wells located Needs maintenance N/A
Remarks:
D. Monitoring Data
1. Monitoring Data
\boxtimes Is routinely submitted on time \boxtimes Is of acceptable quality
2. Monitoring Data Suggests:
Groundwater plume is effectively contained Contaminant concentrations are declining
E. Monitored Natural Attenuation
\square Properly secured/locked \square Functioning \square Routinely sampled \square Good condition
$\square All required wells located \square Needs maintenance \square N/A$
Remarks:
X. OTHER REMEDIES
If there are remedies applied at the site and not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction
XI. OVERALL OBSERVATIONS
A. Implementation of the Remedy
with a brief statement of what the remedy is designed to accomplish (e.g., to contain contaminant plume,
minimize infiltration and gas emissions).
B. Adequacy of O&M
Describe issues and observations related to the implementation and scope of O&M procedures. In particular,
O&M activities appear to be sufficient – the landfill cover is functioning as intended, fencing is secure, and fields

C. Early Indicators of Potential Remedy Problems

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future. None observed during the site inspection. EPA will begin additional characterization of groundwater

contamination downgradient of MW-109 Area to establish a TI waiver zone for this area.

D. **Opportunities for Optimization**

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. None observed during the site inspection.

APPENDIX F – PRESS NOTICE



Petro-Chemical Systems, Inc. (Turtle Bayou) Superfund Site **Public Notice** U. S. Environmental Protection Agency, Region 6

November 2015

The five-year review is schedule for completion in July 2016, and the report will be made available to the public at the remedy implementation and performance at the Petrothe following local information repository:

> Liberty Municipal Library 1710 Sam Houston Avenue Liberty, Texas 77575 (936) 336-8901

Site status updates are available on the Internet at:

http://www.epa.gov/superfund/petro-chemical-systems

All media inquiries should be directed to the EPA Press Office at (214) 665-2200

For more information about the site, contact:

Raji Josiam/Remedial Project Manager (214) 665-8529 or 1-800-533-3508 (toll-free) or by e-mail at Josiam.raji@epa.gov

The U.S. Environmental Protection Agency Region 6

(EPA) will be conducting the fourth five-year review of

Chemical Systems, Inc. (Turtle Bayou) Superfund Site (Site) located in Liberty County, Texas. The EPA divided

the Site into two operable units (OUs) to manage site

impacted soil on County Road 126 and placement in a

temporary aboveground landfill at OU2. The OU2 remedy for impacted soil at several areas adjacent to County Road

126 consists of treatment, on-site consolidation, capping and surface restoration, and stormwater controls; the

remedy for impacted groundwater consists of treatment, containment and long-term maintenance and monitoring.

The five-year review will determine if the remedies are

still protective of human health and the environment following completion of remedy construction in 2010.

cleanup. The OU1 remedy consists of excavation of

Stephen Harper/Community Involvement Coordinator (214) 665-2727 or 1-800-533-3508 (toll-free) or by e-mail at Harper.stephen@epa.gov

APPENDIX G – REMOVAL ACTION AND/OR REMEDIAL ACTION AND SITE INSPECTION PHOTOS

Historical Site Photos and Photos of 2009-2010 CR126 Resurfacing and FWRA Remedial Action



Cutting of subgrade and ditch along CR126 (2009)



Adding aggregate to subgrade along CR126 (2009)



Asphalt paving of CR126 (2010)



CR126 Ditch prior to improvements (2010)



Construction of new ditches along CR126 (2010)



Installation of new ditch culverts (2010)



Mixing of treated soil with lime (2009)



FWRA soil treatment area graded and hydroseeded (2009)



Wastewater treatment plant at the MWA (2005)



Office Trailer Area (2005)

Site Inspection Photos: January 12, 2016



CR126, looking east



Locked and secured well TMW-23R in the FWRA



Looking south at a shed on the FWRA where sampling purge water is stored



Culvert running parallel to CR126 discharging to Turtle Bayou (far right)



Bridge over Turtle Bayou (easternmost extent of the Site)



Turtle Bayou, looking northeast



Turtle Bayou, looking south of the bridge



Field north of MW-109 where bioremediation took place



Former soil borrow area for MW-109 bioremediation remedy



MW-109A, adjacent to CR126



Gated and locked entrance to the WRA, looking south



The WRA, facing east (showing well AW32)



View from top of the TRSF, looking west



Sumps on top of the TRSF



Well EMW11, within the B53 subarea of the OTA



Well MW-010, within the MW-10 subarea of the OTA



Secured entrance into the utility easement areas (the EA)



EA well south of CR126 G-13

APPENDIX H – DETAILED ARARS REVIEW

CERCLA Section 121(d)(1) requires that Superfund remedial actions attain "a degree of cleanup of hazardous substance, pollutants, and contaminants released into the environment and of control of further release at a minimum which assures protection of human health and the environment." The remedial action must achieve a level of cleanup that at least attains those requirements that are legally applicable or relevant and appropriate. In performing the FYR for compliance with ARARs, only those ARARs that address the protectiveness of the remedy are reviewed.

Groundwater ARARs

The 2006 AROD and 2012 ESDs identified chemical-specific ARARs for the Site's groundwater COCs as the MCLs specified under the Safe Drinking Water Act. In the absence of an MCL, the AROD and ESDs listed the Tier 1 protective concentration limits established under TCEQ's Texas Risk Reduction Program (TCEQ TRRP Tier 1 PCLs). The PCLs are health-based guidance levels and not enforceable standards. The 2006 AROD required two years of transitional monitoring to further characterize hydrogeologic conditions and the lateral and vertical extent of COCs that exceed cleanup standards. Based on the transitional monitoring results, EPA and TCEQ granted a TI waiver for groundwater ARARs in the areas where complete restoration of groundwater was demonstrated to be technically impracticable. EPA issued TI waivers in the two 2012 ESDs for Lyondell Trust- and EPEC-owned properties. They established TI waiver zones where ARARs for groundwater restoration are waived for specific COCs for each area (Table H-1 and Table H-2, respectively). In addition, EPA established a compliance zone boundary outside of the TI waiver zone boundary to verify compliance with ARARs and to verify that the plume has not migrated to the compliance zone wells. The compliance zone also serves as a buffer to allow time, if contingency measures are needed, before the plume migrates to the compliance zone wells.

This review compared current federal MCLs to those used in the 2006 AROD and ESDs for the groundwater COCs. None of the MCLs have changed since the last FYR (Table H-3).

сос	Groundwater Zone Where ARAR Waiver Applies		
1.1.2-Trichloroethane			
1,1-Dichloroethane	S1		
1,1-Dichloroethylene	S1		
1,2-Dichloroethane	S1 and S2		
1,2-Dichloropropane	S1		
Acetone			
Benzene	S1 and S2		
Cis-1,2-dichloroethylene	S1		
Ethylbenzene			
Lead			
Naphthalene			
Styrene			
TBA ^b	S1 and S2		
Toluene			
Trans-1,2-dichloroethylene	S1		
Trichloroethylene			
Vinyl chloride	S1 and S2		

COC	Groundwater Zone Where ARAR Waiver Applies				
Xylene					
Notes: a. Information obtained from Table 3 in the 2012 ESD. b.ARAR not established. The TCEQ TRRP Tier 1 PCL is waived for this COC. = ARAR waiver not required for this COC					
S2 = intermediate sandy zone					

Table H-2: Summary of COCs Requiring ARAR Waivers at Lyondell Trust Properties^a

	Groundwater Zone Where ARAR Waiver Applies				pplies	
COC	West Road Area	Main Waste Area	B-53/ MW-45 Area	Office Trailer Area	MW- 10 Area	Easement Area
1,1,2-Trichloroethane		S1	S 1			S1
1,1-Dichloroethane						S1
1,1-Dichloroethylene			S1			S1
1,2-Dichloroethane		S1	S1		S1	S1
1,2-Dichloropropane			S1			S1
Acetone						
Benzene	S1, S2	S1	S1, S2	S1	S1	S1
Cis-1,2-dichloroethylene			S 1			S1
Ethylbenzene	S1				S1	S1
Lead			S2			
Naphthalene	S1	S1	S1		S1	S1
Styrene						S1
TBA	S1	S1	S1, S2	S1	S1	S1
Toluene			S1		S1	S1
Trans-1,2-dichloroethylene			S1			S1
Trichloroethylene			S1			S1
Vinyl chloride		S1	S1, S2		S1	S1
Xylene			S1 ^c			S1 ^c
Notes:						
a. Information from Table 3 in the 2012 ESD.						

b. ARAR not established. The TCEQ TRRP Tier 1 PCL is waived for this COC.

c. The 2012 ESD indicates that ARAR waivers for xylene apply to meta- and para-xylene.

-- = ARAR waiver not required for this COC

S1 = shallow sandy zone

S2 = intermediate sandy zone

Table H-3: Previous and Current ARARs for Groundwater COCs

COC	2006 AROD ARAR ^a (µg/L)	Current Federal MCL (µg/L)	ARAR Change
1,1,2-Trichloroethane	5	5	none
1,1-Dichloroethane	NA	NA	none
1,1-Dichloroethylene	7	7	none
1,2-Dichloroethane	5	5	none
1,2-Dichloropropane	5	5	none
Acetone	NA	NA	none

COC	2006 AROD ARAR ^a (µg/L)	Current Federal MCL (µg/L)	ARAR Change
Benzene	5	5	none
Cis-1,2-dichloroethylene	70	70	none
Ethylbenzene	700	700	none
Lead	15	15	none
Naphthalene	NA	NA	none
Styrene	100	100	none
ТВА	NA	NA	none
Toluene	1,000	1,000	none
Trans-1,2-dichloroethylene	100	100	none
Trichloroethylene	5	5	none
Vinyl chloride	2	2	none
Xylene	10,000	10,000	none
Notes:			

a. COCs as identified in the Site's 2006 AROD.

b.The source for the National Primary Drinking Water MCLs is <u>http://water.epa.gov/drink/contaminants/index.cfm</u> (accessed on 11/18/2015).

NA = not applicable; MCLs have not been established for these COCs. The 2006 AROD established TCEQ TRRP Tier 1 PCLs.
APPENDIX I – ADDITIONAL FIGURES AND TABLES TO SUPPORT DETAILED DATA ANALYSIS

Figure I-1: Monitoring Well Locations at EPEC's FWRA



Table I-1: Summary	of Anal	vtical Data	for S-1 V	Vells E	ceeding	Cleanup	Goals a	t EPEC	's FWRA	(2010 t)	to 201	4)
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| Assiyte | Standord | 15/30/2003 | 107/2009
 | 4276309 | 8/1/12009 | 11/15/2009 | 160310
 | 3/08/2013 | 6682013 | 12/07/2011
 | 605/3013 | 1006/0308 | 106/0309 | 404(2009
 | 4040009 (D) | 8430269 | 4*0x09 (D)
 | 11/10/2009 | 1/5/0013 | 3296610 | 62062510
 | 1207/0011 | 6/05/2013 | |
 | |
| Acatone | 22 | -0.500 UJ | <1010
 | <0.400 UJ | <1.500 | <0.500 | <1.0047
 | +0.500 R | -0.500 R | <1.90
 | -10.520 | -0.010 0.0 | +0.010 R | <1010
 | <1.010 | -0.010 H | -3010R
 | +0.010 R | -01047 | <2.010 | -0.010 R
 | -0.01 | -0010 | |
 | |
| Scripting | 0.005 | 0.257 | 0.274
 | 0.195 | 0.257 | 0.315 | 0.351
 | 0.388 | 0.525 | 0.891
 | 0.591 | +0.0004 | +0.0004 | +0.0004
 | +0.0034 | +0.00040 | +0.00540
 | -3.90849 | -0.00060 | +0.00021 | +0.00021
 | -0.0002 | +0.00021 | |
 | |
| 1,1-Dichloroctheme | 4.9 | 8.0348 | 0.0834
 | 0.0552 | 0.0630 | 0.8750 | 0.0855
 | 0.0845 | 0.124 | 0,432
 | 0.130 | 0.0455 | 0.0254 | 0.0447
 | 0.035 | 0.058 | 0.0859
 | 0.0429 | 0.034 | 0.0303 | 0.0308
 | 0.0837 | 0.0587 | |
 | |
| 1,1-Dichloroethene | 0.007 | <0.027 | 0.0841
 | -10.0054 | <1.027 | <0.027 | 0.0645
 | +0.015 UJ | -10.015 | -0.012
 | -10.010 | -0.00054 | <0.00054 | <0.00024
 | -10.000024 | -10.000254 | <0.00054
 | <0.00054 | <0.00050 | <0.00029 | -10.000229
 | -0.00123 | <0.000200 | |
 | |
| 1,2-Dicklorectheme | 0.005 | =0.017 | 0.0844
 | 0.0038-J | -0.017 | -0.017 | 0.005
 | +0.017 | +0.017 | +0.010
 | +0.011 | +0.00034 | +0.00054 | +0.00034
 | +0.00034 | +0.00034 | +0.00034
 | -0.00034 | •0.00082 | •0.00033 | +0.00033
 | -0.0002 | +0.00022 | |
 | |
| 1,2-Dichloropropane | 0.005 | <0.011 | <0.021
 | -10.0021 | -0.011 | <0.011 | -10.000002
 | <0.014 | -0.014 | -0.013
 | -10.013 | -0.00021 | <0.00021 | <0.00024
 | -10.00021 | -10.000221 | -0.00021
 | <0.00021 | <0.00062 | <0.00027 | -0.00027
 | -0.00125 | <0.00026 | |
 | |
| cis 1,3 Dichloroethene | 0.07 | <0.010 | 0.0821
 | -10.0620 | <2.010 | <0.010 | 0.0625
 | <0.016 | -10.016 | -0.013
 | -10.012 | -0.00020 | <0.00000 | <0.00020
 | -10.00020 | -10.000220 | <0.00030
 | <0.00000 | <0.00056 | <0.00032 | -10.000332
 | -0.00126 | <0.0002M | |
 | |
| ttans-1,2-Dichloroethene | 0.1 | <0.023 | 0.0871
 | 0.0006 J | <0.025 | <0.023 | 0.0672
 | <0.017 | -10.017 | -0.018
 | -10.011 | -0.00045 | <0.00045 | <0.00045
 | <0.00045 | -10.00045 | -0.00545
 | <0.00045 | <0.00045 | <0.00034 | -10.000334
 | -0.00132 | <0.00020 | |
 | |
| Ctr/bergene | 0.7 | <0.022 | -1040
 | -0.0640 | <1.022 | <1022 | -0.000225
 | <0.010 | -0.010 | -0.010
 | -10.015 | -0.00043 | <0.00040 | <0.00043
 | -10.00043 | -0.00043 | -0.00040
 | <0.00040 | <0.00055 | -0.0002 | -0.0002
 | <0.0002 | <0.00029 | |
 | |
| Nachtholene | 0.327 | <0.050 | <2.100
 | <0.010 | <10.050 | <0.050 | <0.00065 UJ
 | <0.050 | -10.050 | <105
 | -10.050 | <0.0010 | -10.0010 | -0.0010
 | -0.0010 | <0.0010 | <0.0010
 | <0.0010 | <0.00065 | <0.001 | <0.001
 | <0.001 | <2.0010 | |
 | |
| Sherry | 0.1 | -0.018 | 10.038
 | +0.0038 | -0.018 | -0.018 | +0.00058
 | +0.010 | +0.010 | -0.010
 | +0.010 | +0.00038 | +0.00035 | +0.00038
 | +0.00038 | +0.00038 | -0.00038
 | -0.00035 | -0.00066 | +0.0002 | +0.0002
 | -0.0002 | +0.00020 | |
 | |
| VButyl slookol | 2.2 | 0.3793 | 0.671
 | 0,789 | 0.856 J | 0.823 J | -0.016 R
 | 0.242 J | 0.52 J | 0,795.3
 | +0.240 | +0.0053 | 5.22 E J | +0.0053
 | +0.0053 | -0.0053 | -0.0053
 | +0.0053 | +0.015 R | +0.0005 | +0.0025
 | +0.003 | +0.0047 | |
 | |
| 1.1.2 Trichlorgethane | 0.005 | <0.013 | <10.020
 | -0.0036 | <0.010 | <0.010 | -10.000390
 | <0.015 | -0.015 | -0.011
 | -10.010 | -0.00020 | <0.00006 | <0.00006
 | -10.000006 | -10.000226 | <0.000230
 | <0.000000 | <0.00060 | -0.00029 | -0.00029
 | -0.000222 | <0.00020 | |
 | |
| Tokene | 1 | <0.010 | 0.0827
 | -0.0036 | <0.016 | <0.010 | 0.0629
 | <0.010 | -0.010 | 8.816/1 J
 | -0.010 | -0.00035 | <0.00005 | -0.00005
 | -0.00006 | 0.0083010* | 0.00079101
 | <0.000005 | <0.00043 | -0.00022 | -0.0002
 | -0.0062 | <0.000200 | |
 | |
| Trichlosethere | 0.005 | <0.016 | 0.00060.1
 | -0.0632 | <0.010 | <0.010 | 0.00066.1
 | <0.012 | -0.012 | -0.012
 | -:0.016 | -0.00032 | <0.00022 | -0.00002
 | -10.000002 | -0.000332 | <0.000322
 | <0.000022 | <0.00052 | -0.00001 | -0.00021
 | -0.08226 | <0.00001 | |
 | |
| May Chiefe | 0.002 | 2.85.1 | 3.45
 | 3.1 | 2.81 | 1.12.1 | 3.35
 | 3.43 | 3.21 | 47
 | 3,790 | 0.0482.3 | 0.0148 | 0.0114
 | 0.0303 | 0.0125 | 0.0115
 | 0.0154 | 0.0141 | 0.0054 | 0.0038
 | 0.0104 | 0.0037 | 4 |
 | |
| Solver (Total) | | +1058 | +1.0012
 | +1012 | +0.055 | 10.058 | +1.0017
 | all 0.27 | +0.077 | 10008
 | 10.025 | +0.0012 | +0.0512 | +0.0012
 | +0.0012 | +10012 | +1.0012
 | +0.0012 | +0.0017 | 10.00054 | +0.00054
 | +0.00052 | +0.00050 | 1 |
 | |
| end (Dissolved) | 0.015 | +0.0050 UU | (1.11)
 | -0.0650 | +0.0050 | |
 | | |
 | | +0.0050 UJ | -0.015 | -10.0050
 | -0.0050 | <0.0050 | <0.0058
 | | | |
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 | |
| Lend (Table | 0.015 | STREET | <0.0050
 | -0.00590 | <0.0050 | <0.010 | <0.0017
 | -0.010 | -0.005 | -0.005
 | -0.005 | -01050101 | -0.0050 | -0.0050
 | -0.0050 | <0.0050 | <0.0054
 | -0.010 | -0.0017 | <0.006 | <0.035
 | -0.005 | -0.005 | |
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	Groundwater Cleanup	
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| Analytic | Groundwater
Cleanup
Standard | 10/20/2009 | 10/30/2008
 | 1.25(230) | 4272002 | 5140022 | 11/10/2009
 | 1/12/2009 12 | 1/62010 | 10/2010 (01
 | 3232010 | 3/29/2010 (2) | 6(25(2))0 | 12/27/2011
 | 0252013 | 10/36/2005 | 10/30/2005
 | 105/2009 | 4242200 | 0130000 | NW 2018
 | 1/6(2010 | 323/2010 | 6050010 | 12270011
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-0.0047 UJ
 | 3032010
-508 | 303(2010 (D) | 6250210
-231R | 12/27/2011
 | 6/25/2013 | 10/58/2008
-{0.050 UJ | 10/36/2005
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<110 | NW 2016
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40/100 R
 | 1/62210
<01087 | 323/2010 | 60400H0 | 12270011
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27
0.005 | 10/30/2008
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 | 126(0009
40.100 R
10.911 | 4/27/2009
<1.4 (L)
(2001 | 5142500
-0.200 R
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0.268 J
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-016
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1523 | 12/27/2011
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-45,5 UJ
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 | 1050000
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11.5 | 323(2010 (0)
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1020
11.3 | 12/27/2011
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82968-1
11.5
 | 6/25/2013
<1.000
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11.4 | 10/56/2008
-40.050 UJ
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-0.0454 | 10/30/2005
40.012 UJ
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6.0173
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-0.0171 | 3/29/2010
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 | 6040010
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| Analytz
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1,1-Cichlorestrane | Cleanup
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 | 10/50/2000
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100961
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-6.070
 | 108(000)
<0.100 R
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0.107 | 427/2009
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40.200 R
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42.9
40.011 | 14/10/2009
-3-1081
-8-2081 J
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0.007 | 43/2010 (0)
-0.0047 0J
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-0.0078
 | 3292040
<50 R
82964
445
<0.150 W | 323(2010 (0)
-015
 | 6280310
<20 R
6321
143
<0.058 | 1207/2011
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- 8290 3
- 11.5
- 40.12
 | 6292013
<1.000
0.001
91.4
<0.020 | 10/36/2008
40.050 UJ
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40.0027 | 1015052000
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-0.00173
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 | 10252000
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-40.034
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4009 | NW 2016
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 | 11622010
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<0.00250 | 3032040
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-510021
-0.0151
-0.029 | 1227/2011
<1.0
<0.025
<0.025
<0.023
 | 605/0013
-01010
-0.0051
-0.0051
-0.0050 |
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Analytz
Mathum
1,1-Dictionethane
1,1-Dictionethane
1,2-Dictionethane | Groundwater
Cleanup
Standard
27
0.005
4.9
0.007
0.005 | 1070.2008
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-65773
-14433
-6.270 03
-4.170 03 | 10/50/2008
-51 00
10/50 1
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-40 270
-4170
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0.0008 J | 5/142020
40.200 R
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60.0420 | 14/10/0009
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0.0472 J | W 190
1/62010
-03097
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6837
6835 | 45/2010 (D)
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-0.4578
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 | 3232040
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41.5
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- 0.102
- 0.0289 | 6250310
<20 R
6323
113
<0.023
<0.066 | 1207/2011
3010
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40.12
40.12
 | 6292013
57.000
51.000
19.4
-0.020
6.0350.J | 10/36/2008
+0.050 UJ
<0.0150
0.0154
<0.0027
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UU 21000-
0.0173
0.0003-
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 | 10252000
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10/10/2000
40.100 R
311000
6.0152
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 | 11622010
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<10 R
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40.007
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40.0029
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40.003 | 122702011
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<0.0021
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| Analyte
Avalute
National
1,1-Dichlorsethane
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1,2-Dichlorgethane
1,2-Dichlorgethane | Geometreater
Cleanup
Standard
27
0.005
4.9
0.007
0.005
0.005 | 1070/2008
<50 UJ
0207/J
1441 J
<0 270 UJ
<0 170 UJ
<0 110 UJ | 100502008
-52100
100101
-400
-40070
-40070
-40070
-40070
 | 1080000
40.100 R
10981
1034
0.457
8.8028
8.8028 J | 427/2009
<10/101
4080
40.054
6.004 J
<0.021 | 5/14/2020
40.200 R
12/9
<0.0111
6.6426
<0.0042 | 11/10/2006
<3.0081
8.2081
46.4
<0.270
<0.170
<0.110
 | 40.500 R
40.500 R
40.500 R
40.501
45.2
40.027
60.6472 J
40.011 | IN 150
1/52210
-0.00M/
8.00
14.J
8.00
8.00
0.0045 | 45/2010 (D)
-0.0047 UJ
1096
25/6 J
0.0078
0.0078
0.0046
 | 309/2010
<50 R
9.206 J
41.5
<0.150 0J
<0.170
<0.140 | 3292010 (D)
-015
8278
13.4
9.152
0.0288
0.0841 | 6250310
<20 R
1433
<1023
<1023
<1025
<1055 | 12/27/2011
50:0
10:900-1
11:5
-0:12
-0:12
-0:13
 | 6/25/20/13
<1/12/10
91.4
<1/12/0
6/03/6/1
<1/12/0
6/03/6/1
<1/12/8 | 10/56/2008
40.0550 UJ
40.0000
0.0454
40.0007
40.0017
-0.0011 | 10/30/2006
-0.0/15 UU
-0.0005/4
-0.0005/4
-0.0002/1
 | 105/2000
<0210 R
<0.0242
<0.0027
0.0007 J
<0.0011 | 4240000
-111
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-0.024
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-0.024
-0.021 | 8/130009
<10
<0.023
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<0.024
<0.021 | NW 2016
11/10/2000
40.100 R
40.000
40.0054
-0.0054
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-0.0021
 | 1/622/0
<0.017/
4/10050
6.6474
-6.00250
-6.00250
-6.00252 | 303/2010
<10 R
-410 R
-40.022
+0.023
-0.023
-0.027 | 42.1 R
42.1 R
40.027
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40.0028
40.0027 | 12270041
<1.0
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| Analyts
Acetane
No-Decisionsthane
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No-Decisionsthane | Cleanup
Standard
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0.005
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0.07 | 15352005
-25310
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-427003
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-411003 | 10/30/2008
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-6/270
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 | 1280200
40.100 R
10.901
0.457
0.9029 J
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0.9029 J | 4/27/2000
<1.4 (L)
44.0
<1.0.54
6.0.054
-0.0.21
<0.0.21
<0.020 | 5146029
+0.200 R
42.9
+0.011
0.0420
+0.0042
0.0057 J | 18/10/2005
<3-1080
8:206.0
46:4
<0.270
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 | 11112/2005 (D)
-0.500 R
0.001
15.2
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-0.017
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-0.010 | IN 198
1952010
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8 314 | 13/2012 (D)
-0.0547 UJ
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-0.150 00
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-0.140
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-0.160 | 309/2010 (D)
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<0.124 | 10362008
40.050 UU
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0.369 J | 105325008
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8.8026
9.0025 J
8.8104
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8.35 | 5/142020
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8.007
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8.006 J | 1572012 (D)
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8,270 J | 303(2018 (D)
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0.336 | 6280210
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-11.3
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11.5
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 | 62502013
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11.4
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6.0300.3
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0.249 | 10/50/2008
+0.283 UU
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40/15/00
40/175
40/00/24
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-0.0010
-0.0023 | 4242200
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-0.0045
 | 1602010
-01087
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-010000
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-0.1 R
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NOTES: At Youwain might Exceedings are highlighted, and objections are shown in bold (D) - Field Dublets Same C - Youra exceeds calculation mode C - Youra exceeds calculation mode C - Hot exceeds dublet of mode (D) - Hot external dublet of might might (D) - Hot external dublet of might might might be Mahar than reported. (D) - Could be middle dublet of dublet on addression in the Mahar than reported.

	Groundwater		
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 | 8/17/2009 | 11/10/2009 | 1/6/2010 | 3/30/2010
 | 8/29/2010 | 12/28/2011 | 6/25/2013 | 12/29/2014

 | 10/31/2008 | 1/28/2009
 | 4/29/2009 | 4/29/2009 (D) | 8/17/2009 | 8/17/2009 (D
 | 11/10/2009 | 1/8/2010 | 3/30/2010 | 6/29/2010
 | 10/31/2008 | 1/27/2009 | 127/2009 (T | 4/27/2009
 | 8/14/2009 | 11/10/2009 | 1/8/2010 | 3/29/2010 | 8/28/2010 | 12/28/2011 | 8/25/2013 | 12/29/201 |
| Acetone | 22 | <0.010 | <0.010 | <0.010 UJ
 | 0.118 J | 0.765 | 0.201 J | 0.277 J
 | 0.204 J | <0.010 | 0.150 | <0.053

 | <0.010 | <0.010
 | <0.010 UJ | <0.010 UJ | 0.0133 J | 0.0159 J
 | 0.402 | 0.0431 | <0.010 R | <0.01 R
 | <0.010 | <0.010 | <0.010 | <0.010 UJ
 | <0.010 R | <0.010 | <0.0047 UJ | <0.010 R | <0.010 R | <0.010 | <0.010 | <0.011 |
| Benzene | 0.005 | 0.00067J | 0.0012 | 0.0057
 | 0.261 | 1.08 | 0.928 | 0.458
 | 0.227 | 0.0005 J | 0.295 | 0.103

 | <0.00040 | <0.00040
 | 0.00063 J | 0.00043 J | 0.0337 | 0.0320
 | 0.737 | 0.203 | 0.0153 | 0.003
 | 0.00095J | <0.00040 | <0.00040 | <0.00040
 | <0.00040 | <0.00040 | <0.00050 | <0.00021 | <0.00021 | <0.0002 | <0.00021 | <0.00024 |
| 1,1-Dichloroethane | 4.9 | 0.0239 | 0.0379 | 0.077
 | 0.0544 | 0.0481 | 0.0758 | 0.158
 | 0.218 | 0.0359 | 0.0387 | 0.0176

 | 0.0099 | 0.0095
 | 0.0143 | 0.0117 | 0.0121 | 0.0110
 | 0.0301 | 0.0172 | 0.0047 | 0.0019
 | 0.0022 | <0.00024 | <0.00024 | 0.00089 J
 | 0.00089 J | <0.00024 | <0.00052 | 0.00075 J | <0.00022 | 0.00053 J | 0.0053 | 0.0018 |
| 1,1-Dichloroethene | 0.007 | <0.00054 | <0.00054 | <0.00054
 | <0.0027 | <0.011 | <0.00050 | <0.0015
 | <0.0029 | <0.00023 | <0.00020 | <0.0013

 | <0.00054 | <0.00054
 | <0.00054 | <0.00054 | <0.00054 | <0.00054
 | <0.0054 | <0.00050 | <0.00029 | <0.00029
 | <0.00054 | <0.00054 | <0.00054 | <0.00054
 | <0.00054 | <0.00054 | <0.00050 | <0.00029 U. | <0.00029 | <0.00023 | <0.00020 | <0.00025 |
| 1,2-Dichloroethane | 0.005 | 0.000423 | 0.00066 J | 0.0013
 | 0.0051 | 0.0160 J | 0.0093 | 0.0074
 | <0.0033 | 0.0012 | 0.0047 | <0.0012

 | <0.00034 | <0.00034
 | <0.00034 | ×0.00034 | 0.00081 J | 0.00078 3
 | 0.0102 | 0.0022 | <0.00033 | <0.00033
 | <0.00034 | <0.00034 | <0.00034 | <0.00034
 | ×0.00034 | ×0.00034 | <0.00082 | <0.00033 | <0.00033 | <0.0002 | <0.00022 | +0.00024 |
| Charles of the second se | 0.005 | ×0.00021 | +0.00021 | <0.00021
<0.00020 | +0.0011
 | 10.0042 | 0.00062 | +0.0014 | ×0.0027
×0.0092
 | +0.00025 | <0.00026
<0.00024 | +0.0018

 | <0.00021
<0.00020 | +0.00021 |
<0.00021
<0.00020 | +0.00021 | ×0.00021
×0.00020 | ×0.00021 | <0.0021
<0.0020
 | <0.00052
<0.00058 | +0.00027 | ×0.00027
×0.00032
 | ×0.00021 | <0.00021
<0.00020 | +0.00021 | ×0.00021
×0.00020 | ×0.00021
×0.00020
 | ×0.00021 | +0.00062 | ×0.00027
×0.00082 | ×0.00027 | <0.00025
x0.00028 | <0.00028
<0.00024 | ×0.00036 |
| trans-1.2-Dichloroethene | 0.1 | 0.00081.1 | 0.00077 J | 0.0014
 | 10.0023 | 10.0000 | 0.0031 | 0.0036 J
 | 0.0057 J | 0.0012 | 0.0030 | +0.0017

 | +0.00045 | +0.00045
 | +0.00045 | +0.00045 | +0.00045 | +0.00045
 | +0.0045 | 0.00087 J | +0.00034 | +0.00034
 | +0.00045 | <0.00045 | +0.00045 | +0.00045
 | +0.00045 | +0.00045 | +0.00045 | +0.00034 | 10.00034 | +0.00035 | +0.00023 | +0.00034 |
| Ethyberzene | 0.7 | <0.00043 | <0.00043 | <0.00043
 | 0.0064 | 0.0353 | 0.0035 | 0.0171
 | 0.0085 J | <0.0002 | 0.0069 | 0.0055

 | <0.00043 | <0.00043
 | <0.00043 | <0.00043 | 0.00083 J | 0.00078 J
 | 0.0217 | 0.008 | 0.00061 J | <0.0002
 | <0.00043 | <0.00043 | <0.00043 | <0.00043
 | <0.00043 | <0.00043 | <0.00055 | <0.0002 | <0.0002 | <0.00020 | <0.00029 | <0.00028 |
| Naphthalene | 0.327 | <0.0010 | <0.0010 | <0.0010
 | <0.0050 | 0.0282 J | 0.0148 J | 0.008 J
 | <0.01 | <0.001 | 0.0063 | <0.0050

 | <0.0010 | <0.0010
 | <0.0010 | <0.0010 | <0.0010 | <0.0010
 | <0.010 | 0.00073 J | <0.0010 | <0.0010
 | <0.0010 | <0.0010 | <0.0010 | <0.0010
 | <0.0010 | <0.0010 | <0.00065 R | <0.0010 | <0.0010 UJ | <0.001 | <0.0010 | <0.0010 |
| Styrene | 0.1 | <0.00038 | <0.00038 | <0.00038
 | <0.0018 | <0.0072 | <0.00058 | <0.001
 | <0.002 | <0.0002 | <0.00020 | <0.0012

 | <0.00038 | <0.00038
 | <0.00038 | <0.00038 | <0.00038 | <0.00038
 | <0.0038 | <0.00058 | <0.0002 | <0.0002
 | <0.00038 | <0.00038 | <0.00038 | <0.00038
 | <0.00038 | <0.00038 | <0.00058 | <0.0002 | <0.0002 | <0.0002 | <0.00020 | <0.00023 |
| t-Butyl alcohol | 2.2 | <0.0058 | <0.0053 | 0.0194 J
 | 3.550 | 12.5 | <0.016 R | 5.2
 | 5.03 | <0.003 | <0.0047 | 1.67

 | <0.0053 | <0.0053
 | <0.0053 | <0.0053 | 0.376 | 0.333
 | 8.07 | <0.016 R | 0.126 | 0.0307
 | 0.0221 | <0.0053 | <0.0053 | <0.0053
 | <0.0058 | <0.0053 | <0.016 R | <0.0035 | <0.0035 | <0.003 | <0.0047 | <0.0088 |
| 1,1,2 Trichloroethane | 0.005 | <0.00028 | <0.00028 | <0.00028
 | <0.0013 | <0.0052 | <0.00098 | <0.0015
 | <0.0029 | <0.00022 | <0.00020 | <0.0018

 | <0.00028 | <0.00028
 | <0.00028 | <0.00028 | <0.00028 | <0.00028
 | <0.0028 | <0.00098 | <0.00029 | <0.00029
 | <0.00028 | <0.00028 | <0.00028 | <0.00028
 | <0.00028 | <0.00028 | <0.00098 | <0.00029 | <0.00029 | <0.00022 | <0.00020 | <0.00032 |
| Toluene | 1 | <0.00035 | <0.00035 | L 69060.0
 | 0.0440 | 0.210 | 0.192 | 0.100
 | 0.0524 | <0.0002 | 0.0613 | 0.0233

 | <0.00035 | <0.00035
 | <0.00035 | <0.00035 | 0.0063 | 0.0057
 | 0.141 | 0.0529 | 0.0034 | 0.00069 J
 | <0.00035 | <0.00035 | <0.00035 | <0.00035
 | 0.00087 U* | <0.00035 | <0.00043 | <0.0002 | <0.0002 | <0.00020 | <0.00020 | <0.00020 |
| Trichloroethene | 0.005 | 40.00032 | <0.00032 | <0.00032
 | -0.0016 | +0.0064 | ×0.00052 | <0.0012
0.104
 | 40.0024 | -0.00028 | +0.00031 | <0.0015

 | <0.00032 | <0.00032
 | <0.00032 | 40.00032 | ×0.00032 | +0.00032
 | <0.0032 | <0.00052 | -0.00024 | ×0.00024
 | 10.00032 | 40.00032 | 40.00032 | <0.00032
 | ×0.00032 | -0.00032 | <0.00052 | +0.00024 | ×0.00024 | <0.00028
0.0107 | +0.00031 | +0.00030 |
| Xviene (Total) | 10 | +0.0012 | +0.0012 | ≤0.0012
 | 10.0058 | 0.0440.1 | 0.0519 | 0.0237
 | 0.0143.4 | +0.00052 | 0.0181 | 0.0076 .1

 | ≤0.0012 | <0.0012
 | +0.0012 | +0.0012 | ≤0.0012 | +0.0012
 | 0.0269.4 | 0.0102 | 0.00086.1 | <0.00054
 | +0.0012 | ≤0.0012 | ≤0.0012 | +0.0012
 | ≤0.0012 | <0.0012 | +0.0017 | 10 00054 | 10 00054 | 10 00052 | <0.00050 | <0.00068 |
| Lead (Dissched) | 0.015 | *0.005 | +0.010 | +0.0050
 | <0.0050 UJ | | |
 | | | |

 | +0.005 | ×0.010
 | +0.0050 | +0.0050 | <0.0050 UJ | <0.0050 UJ
 | | | |
 | ×0.005 | +0.010 | +0.010 | +0.0050
 | <0.0050 | | | | | | | |
| Level (Total) | 0.015 | <0.005 UJ | +0.0060 | -0.0050
 | <0.0050 UJ | -0.0050 | 0.0004.000 | -0.005
 | -0.005 | -0.015 | | -0.007

 | AT1 (100) 1111 |
 | | | |
 | | | | -0.045
 | ALC: UNDER 1818 | | | -
 | -0.0050 | | | -0.040 | | -0.005 | -0.005 | -0.005 |
| | | | -0.0000 | N0.0050
 | | N0.0050 | 0.0024 0 | N0.005
 | NU.005 | <0.005 | *0.005 | *0.005

 | -0.000 00 | <0.0050
 | <0.0050 | <0.0050 | 40.0050 03 | 40.0050.00
 | <0.0050 | 0.0023 U* | | *0.005
 | 40.000 00 | <0.0050 | *0.0050 | *0.0050
 | *0.0050 | <0.0050 | 0.0017 U* | <0.010 | *0.005 | 40.005 | NU.005 | NU.005 |
| | | | 40.0000 | N0.0000
 | | NU.0050 | 0.0024 0 | 40.005
 | 40.005 | ×0.005 | ×0.005 | ×0.005

 | 40.000 00 | <0.0050
 | <0.0050 | <0.0050 | 40.0050 00 | 40.0050 00
 | <0.0050 | 0.0023 U* | | ×0.005
 | 40.003 02 | <0.0050 | ×0.0050 | ×0.0050
 | ×0.0050 | <0.0050 | 0.0017 U* | +0.010 | ×0.005 | 40.005 | NU.005 | N0.005 |
| | Connectionalise | | 40.0000 | 40.0000
 | MP-02 | R-D | 0.0024 0 | 40.005
 | NU.005 | ×0.005 | +0.005 | ×0.005

 | -0.000 00 | <0.0050
 | <0.0050 | <0.0050
8 | 40.0050 05 | ×0.0050 00
 | <0.0050 | 0.0023 U* | | ×0.005
 | 10.003 02 | <0.0050 | 40.0050 | 40.0050
 | ×0.0050 | <0.0050 | 0.0017 U* | ×0.010 | *0.005 | 40.005 | ×0.005 | ×0.005 |
| | Groundwater | | -0.000 | 40.0000
 | MP-02 | R-D | 0.0024 0* | N0.005
 | 40.005 | ×0.005 | ×0.005 | ×0.005

 | -0.000 00 | ×0.0050
 | <0.0050 | <0.0050
8 | ×0.0050 00 | 40.0050 03
 | <0.0050 | 0.0023 U* | | 40.005
 | -0.005 02 | <0.0050 | ×0.0050 | 40.0050
 | *0.0050 | <0.0050 | 0.0017 U* | 40.010 | 40.005 | 40.005 | 40.005 | 40.005 |
| Analyte | Groundwater
Cleanup
Standard | 10/31/2008 | 1/27/2009 | 4/29/2009
 | MIP-02
8/17/2009 | R-D | 1/6/2010 | 3/29/2010
 | 8/28/2010 | 10/31/2008 | 1/27/2009 | 4/29/2009

 | 8/17/2009 | 11/10/2009
 | <0.0050
MP-04R-
1/8/2010 | <0.0050
8
3/29/2010 | 8/28/2010 | 12/28/2011
 | <0.0050 | 0.0023 0* | 10/31/2008 | 1/27/2009
 | 4/29/2009 | <0.0050
MP-04R-D
8/17/2009 | 11/10/2009 | 1/8/2010
 | \$29/2010 | <0.0050 | 0.0017 U* | 40.010 | 40.005 | 40.005 | 40.005 | 40.005 |
| Analyte
Acetone | Groundwater
Cleanup
Standard
22 | 10/31/2008
<0.010 UJ | 1/27/2009 | 4/29/2009
<0.010 UJ
 | MP-02
8/17/2009
<0.010 R | R-D
11/10/2009
<0.010 | 1/6/2010
<0.0047 UJ | 3/29/2010
<0.010 R
 | 8/28/2010
<0.010 R | 10/31/2008 | <0.005
1/27/2009
<0.010 | 4/29/2009
<0.010 UJ

 | 8/17/2009
<0.010 R | <0.0050
11/10/2009
<0.010 R
 | <0.0050
MP-04R-
1/8/2010
<0.00047 U | <0.0050
8
3/29/2010
<0.010 R | 6/28/2010
<0.010 R | 12/28/2011
 | <0.0050
8/25/2013
<0.010 | 0.0023 U*
12/29/2014
<0.011 | 10/31/2008 | +0.005
1/27/2009
<0.010
 | 4/29/2009
<0.010 UJ | <0.0050
MP-04R-D
8/17/2009
<0.010 R | 11/10/2009
<0.010 R | 1/6/2010
40.00047 U
 | <0.0050
3/29/2010
<0.010 | <0.0050 | 0.0017 U* | 4000 | *0.005 | 40.005 | 40.005 | 40.005 |
| Analyte
Acetone
Benzene | Groundwater
Cleanup
Standard
22
0.005 | 10/31/2008
<0.010 UJ
0.00055 J | 1/27/2009
<0.010
<0.00040 | 4/29/2009
<0.010 UJ
0.0018
 | MP-02
8/17/2009
<0.010 R
0.00048 J | <pre>R-D 11/10/2009 <0.010 <0.00040</pre> | 1/8/2010
<0.0047 UJ
<0.00050 | 3/29/2010
<0.010 R
<0.00021
 | 8/28/2010
<0.010 R
<0.00021 | 10/31/2008
<0.010
0.00060J | <0.005
1/27/2009
<0.010
<0.00040 | 4/29/2009
<0.010 UJ
0.00046 J

 | 8/17/2009
<0.010 R
<0.00040 | <0.0050
11/10/2009
<0.010 R
<0.00040
 | <0.0050
MP-04R-
1/6/2010
<0.00047 U,
0.00081 J | <0.0050
8
3/29/2010
<0.010 R
0.0028 | 6/28/2010
<0.010 R
0.00022 J | 12/28/2011
<0.010
<0.0002
 | <0.0050
8/25/2013
<0.010
<0.00021 | 0.0023 U*
12/29/2014
<0.011
<0.00024 | 10/31/2008
<0.010
0.00044J | <0.005
1/27/2009
<0.010
<0.00040
 | 4/29/2009
<0.010 UJ
0.00071 J | <0.0050
MP-04R-D
8/17/2009
<0.010 R
0.00061 J | <0.0050
11/10/2009
<0.010 R
<0.00040 | 1/6/2010
<0.00047 U/
0.00060 J
 | <0.0050
3/29/2010
<0.010
0.0026 | <0.0050 | 0.0017 U* | 4000 | *0.005 | 40.005 | 40.005 | 40.005 |
| Analyte
Actions
Berzere
1,1-Dichloroethane | Groundwater
Cleanup
Standard
22
0.005
4.9 | 10/31/2008
<0.010 UJ
0.00055 J
0.0014 J | 1/27/2009
<0.010
<0.00040
0.00057 J | 4/29/2009
<0.010 UJ
0.0016
0.0036
 | MP-02
8/17/2009
<0.010 R
0.00048 J
0.00048 J | <pre><0.0000 R-D </pre> | 1/6/2010
<0.0047 UJ
<0.00050
<0.00052 | 3/29/2010
<0.010 R
<0.00021
0.001
 | 6/28/2010
<0.010 R
<0.00021
<0.00022 | <0.005
10/31/2008
<0.010
0.00060J
0.0315 | <0.005
1/27/2009
<0.010
<0.00040
0.0166 | 4/29/2009
<0.010 UJ
0.00046 J
0.0346

 | 8/17/2009
<0.010 R
<0.00040
0.0142 | <0.0050
11/10/2009
<0.010 R
<0.00040
0.0127
 | <0.0050
MP-04R-
1/6(2010
<0.00047 U,
0.00081 J
0.0081 J
0.028 | <0.0050
8
3/29/2010
<0.010 R
0.0026
0.113 | 6/28/2010
<0.010 R
0.00022 J
0.0141 | 12/28/2011
<0.010
<0.0002
0.062
 | <0.0050
6/25/2013
<0.010
<0.00021
0.0048 | 0.0023 0*
12/29/2014
<0.011
<0.00024
0.0031 | 10/31/2008
<0.010
0.00044J
0.0228 | <0.005
1/27/2009
<0.010
<0.00040
0.0208
 | 4/29/2009
<0.010 UJ
0.00071 J
0.0423 | <0.0050
MP-04R-D
8/17/2009
<0.010 R
0.00061 J
0.0342 | <0.0050
<0.010 R
<0.00040
0.0181 | 1/6/2010
40.00047 U.
0.00060 J
0.0277
 | <0.0050
3/29/2010
<0.010
0.0026
0.106 | <0.0050 | 0.0017 U | 40.010 | *0.005 | 40.005 | 40.005 | 40.00 |
| Analyte
Actione
Berzene
1,1-Dichloroethane
1,1-Dichloroethane | Groundwater
Cleanup
Standard
22
0.005
4.9
0.007 | 10/31/2008
<0.010 UJ
0.00055 J
0.0014 J
<0.00054 UJ | 1/27/2009
<0.010
<0.00040
0.00057 J
<0.00054 | 4/29/2009
<0.010 UJ
0.0016
0.0038
<0.00054
 | MP-02
8/17/2009
<0.010 R
0.00048 J
0.00052 J
<0.00054 | R-D
11/10/2009
<0.010
<0.00040
<0.00024
<0.00054 | 1/8/2010
<0.0047 UJ
<0.00050
<0.00052
<0.00050 | \$29/2010
<0.010 R
<0.00021
0.001
<0.00029 U,
 | 40.005
6/28/2010
<0.010 R
<0.00021
<0.00022
<0.00029 | <0.005
10/31/2008
<0.010
0.0315
<0.00054 | <0.005
1/27/2009
<0.010
<0.00040
0.0166
<0.00054 | 4/29/2009
<0.010 UJ
0.0346
<0.00054

 | 8/17/2009
<0.010 R
<0.00040
0.0142
<0.00054 | <0.0050
11/10/2009
<0.010 R
<0.00040
0.0127
<0.00054
 | +0.0050 MP-04R- 1/8/2010 <0.00047 U, 0.00061 J 0.028 <0.00050 | <0.0050
\$
3/29/2010
<0.010 R
0.0028
0.113
<0.00029 UJ | 6/28/2010
<0.010 R
0.00022 J
0.0141
<0.00029 | 12/28/2011
<0.010
<0.0002
<0.00023
 | <0.0050
8/25/2013
<0.010
<0.00021
0.0048
<0.00020 | 0.0023 0*
12/29/2014
<0.011
<0.0024
0.0031
<0.00025 | 10/31/2008
<0.010
0.00044J
0.0228
<0.00054 | <0.005
1/27/2009
<0.010
<0.00040
0.0208
<0.00054
 | 4/29/2009
<0.010 UJ
0.00071 J
0.0423
<0.00054 | <0.0050
MP-04R-D
8/17/2009
<0.010 R
0.00661 J
0.0342
<0.00054 | <0.0050
<0.010 R
<0.00040
0.0181
<0.00054 | 1/6/2010
<0.00047 U,
0.00060 J
0.0277
<0.00050
 | <0.0050
3/29/2010
<0.010
0.0026
0.106
<0.00029 | <0.0050 | 0.0017 U | 40.010 | ×0.005 | 40.005 | 40.005 | 40.005 |
| Analyte
Actions
Bercare
1,1-Dichlorosthane
1,2-Dichlorosthane | Groundwater
Cleanup
Standard
22
0.005
4.9
0.007
0.005 | 10/31/2008
<0.010 UJ
0.00085 J
<0.0014 J
<0.00054 UJ
<0.00034 UJ | <pre>1/27/2009 <0.010 <0.00040 0.00057 J <0.00054 <0.00054</pre> | 4/29/2009
<0.010 UJ
0.0016
0.0038
<0.00054
<0.00054
 | MIP-02
\$/17/2009
<0.010 R
0.00048 J
0.00052 J
<0.00054
<0.00054 | <pre>%0.0050
11/10/2009
<0.010
<0.00040
<0.00024
<0.00054
<0.00054</pre> | 1/8/2010
<0.0047 UJ
<0.00050
<0.00050
<0.00050
<0.00050
<0.00052 | \$29/2010
<0.010 R
<0.00021
0.001
<0.00029 U,
<0.00035
 | 40.005
8/28/2010
40.010 R
40.00021
40.00022
40.00029
40.00029
40.00035 | <0.005
10/31/2008
<0.010
0.00050J
0.0315
<0.00054
0.0005J | <0.005
1/27/2009
<0.010
<0.00040
0.0156
<0.00054
0.00054
0.00054 | 4/29/2009
<0.010 UJ
0.00046 J
0.0346
<0.00054
0.00054 J

 | 8/17/2009
<0.010 R
<0.00040
0.0142
<0.00054 J | <0.0050
11/10/2009
<0.010 R
<0.00040
0.0127
<0.00054
0.00054
0.00054
 | +0.0050 MP-04R- 1/8/2010 <0.00047 U, | <0.0050
\$
\$229/2010
<0.010 R
0.0026
0.113
<0.0029 UJ
0.0036 | 8/28/2010
<0.010 R
0.00022 J
0.0141
<0.00029
0.00037 J | 12/28/2011
<0.010
<0.0002
<0.0002
<0.00023
<0.0002
 | <0.0050
8/25/2013
<0.010
<0.00021
0.0048
<0.00020
<0.00022 | 0.0023 0*
12229/2014
<0.011
<0.0024
<0.0025
<0.00024 | 10/31/2008
<0.010
0.00044J
0.0228
<0.00054
0.0007J | <0.005
1/27/2009
<0.010
<0.00040
0.0208
<0.00054
0.00052 J
 | 4/29/2009
<0.010 UJ
0.00071 J
0.0423
<0.00054
0.0011 | <0.0050
MP-04R-D
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Table I-2: Summary of Analytical Data for S-2 Wells Exceeding Cleanup Goals at EPEC's FWRA (2010 to 2014)

AVTES: AV Values in mgl. Eccendences we highlighted, and detections are shown in bold ()) = Fuld Dualskas Berngin = 1 ()) = Fuld Dualskas Berngin = 1 = Deep zene (perception 4.2.5 ftps)] = Constituent detected below the netfold quartifician limit () = Not Detected and edited belows detection limits may be higher than reported. R = Napolitic and detected below to a detection in a blank sample.

Table 1-3. Summary of Groundwater Data mistice and Outside the WKA Sturry Wa	Table I-3	: Summary of	f Groundwater	Data Inside and	Outside the	WRA Slurr	y Wal
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Well	AW-10/AW-10R ²	AW-038	EW-001/ MW-034	AW-012	AW-10/AW-10R ²	AW-038	EW-001/ MW-034	AW-012
Location	Inside Slurry Wall	Outside Slurry Wall	Inside Slurry Wall	Outside Slurry Wall	Inside Slurry Wall	Outside Slurry Wall	Inside Slurry Wall	Outside Slurry Wall
Screened Zone ¹	M1 / S1	M1 / S1	M1 / S1	M1 / S1	M1 / S1	M1 / S1	M1 / S1	M1 / S1
Analyte	Benzene	Benzene	Benzene	Benzene	TBA	TBA	TBA	TBA
Groundwater Cleanup Standard	5	5	5	5	2,200	2,200	2,200	2,200
December 2005	5,940	5.0 U	5.0 U	5.0 U	18,100	1,160	50 U	50 U
March 2006	1,000	5.0 U	5.0 U	5.0 U	1,990	90	50 U	50 U
May 2006	667	5.0 U	5.0 U	5.0 U	1,290	99	50 U	50 U
October 2006	810	5.0 U	5.0 U	5.0 U	4,150	477	50 U	50 U
December 2006	243	5.0 U	5.0 U	5.0 U	2,820	315	50 U	50 U
March 2007	130	5.0 U	5.0 U	5.0 U	749	50 U	50 U	55
June 2007	206	5.0 U	5.0 U	5.0 U	890	50 U	50 U	50 U
September 2007	470	5.0 U	5.0 U	5.0 U	1,160	50 U	50 U	50 U
April 2008	390	489	5.0 U	5.0 U	2,130	2,040	50 U	50 U
November 2008	500	5.0 U	5.0 U	5.0 U	2,270	50 U	50 U	50 U
November 2009	150	5.0 U	5.0 U	5.0 U	2,430	50 U	50 U	50 U
December 2010	330	0.10 U	0.10 U	0.10 U	5,200	36	3.0 U	3.0 U
December 2011	250	0.30 U		0.30 U	2,700	4.0 U		4.0 U
November 2012	AW-010R Installed				AW-010R Installed			
December 2012	58,000	0.20 U	0.20 U	0.20 U	64,000	10 U	10 U	10 U
November 2013	84,000	0.20 U	0.20 U	0.20 U	140,000	10 U	57	10 U
December 2014	160,000	0.20 U			66,000	10 U		

Notes:

All concentrations in micrograms per liter.

Green Highlighting = Concentration above the Groundwater Cleanup Standard

-- = not sampled

TBA = tert butyl alcohol

U = not detected above the listed detection limit.

¹ Monitoring wells are screened across four different lithologic layers M1- upper silty clay layer, S1 - upper sand layer, C2 - lower clay layer, and S2 - lower sand layer. The M1 and S1 layers comprise the upper water bearing zone and the S2 layer comprises the lower water bearing zone. Refer to Section 1.3 of the Long Term Monitoring Plan for a further discussion of the interpreted monitoring well classifications.

² AW-010 was noted as damaged beyond repair and was replaced with AW-010R in November 2012. A concentration increase for benzene and TBA was noted in December 2012 and November 2013 for the replacement monitoring well, AW-010R. The replacement well was installed with the same construction as the original monitoring well. One possible explanation for this increase is that the damage to monitoring well AW-010 was allowing surface water to infiltrate into the well, causing dilution of the benzene and TBA. Another possible explanation for this increase is that the water quality at the replacement well location is simply different than the original monitoring well locaiton.

Table I-4: Summary of Groundwater Data Side Gradient and Outside the WRA Slurry Wall

Well	AS-002	AW-003	MW-078	MW-152	AS-002	AW-003	MW-078	MW-152
Screened Interval ¹	M1	M1 / S1	M1 / S1	S1	M1	M1 / S1	M1 / S1	S1
Analyte	Benzene	Benzene	Benzene	Benzene	TBA	TBA	TBA	TBA
Groundwater Cleanup Standard	5	5	5	5	2,200	2,200	2,200	2,200
August 2005				5 U				584
November 2005			26,400				2,000 U	
December 2005	57,100	1,630	26,400	5 U	2,000 U	500 U	2,000 U	675
March 2006	58,200	1,760	17,700	5 U	20,000 U	500 U	6,250 U	50 U
May 2006	35,000	1,670	5,960	5 U	5,000 U	500 U	1,250 U	930
October 2006	37,600	1,900	18,000	5 U	10,000 U	500 U	1,250 U	436
December 2006	42,600	2,600	23,800	5 U	10,000 U	705	5,000 U	1,150
March 2007	40,400	1,740	19,000	5 U	10,000 U	500 U	5,000 U	563
June 2007	34,300	1,530	3,430	5 U	2,000 U	500 U	1,000 U	78
September 2007	38,200	1,070	6,850	5 U	10,000 U	250 U	1,000 U	434
April 2008 ²	32,500	728	2,520	455	10,000 U	371	1,330	1,910
November 2008	50,700	1,690	10,800	5.0 U	10,000 U	250 U	4,000 U	1,600
November 2009	26,100	240	10,300	5.0 U	10,000 U	50 U	2,500 U	2,640
December 2010	52,000	3,600	21,000	0.10 U	300 U	110	6,900	6,200
December 2011	38,000	1,100	21,000	0.30 U	400 UJ	250 JL	2,800 JL	8,000
December 2012 ³	28,000	3	30,000	0.20 U	1,000	14	1,700	3,700
November 2013	44,000	340	22,000	0.20 U	2,400	10 U	940	7,900
December 2014			17,000	0.20 U			650	3,500

Notes:

All concentrations in micrograms per liter.

Green Highlighting = Concentration above the Groundwater Cleanup Standard

-- = not sampled TBA = tert butyl alcohol

U = not detected above the method detection limit.

] = datum estimated

JL = datum estimated; low bias

¹ Monitoring wells are screened across four different lithologic layers M1- upper silty clay layer, S1 - upper sand layer, C2 - lower clay layer, and S2 - lower sand layer. The M1 and S1 layers comprise the upper water bearing zone and the S2 layer comprises the lower water bearing zone. Refer to Section 1.3 of the Long Term Monitoring Plan for a further discussion of the interpreted monitoring well classifications.

² The benzene concentration reported for monitoring well MW-152 in April 2008 appears to be anomalously high.

³ The benzene concentration reported for monitoring well AW-003 in December 2012 appears to be anomalously low.







Figure I-3: Groundwater Contaminant Plumes in the M1/S1, S1 and S2 Zones at the MWA, OTA and B-52/MW-45 Subareas



Figure I-4: S2 Contaminant Plumes in the S2 Zone at the MWA, OTA and B-52/MW-45 Subareas







LEGEND

ADJACENT LOT BOUNDARY





APPENDIX J – DETAILED TOXICITY REVIEW

COC	2012 ESD Standard	Тар Wa (µg	ter RSL ^a /L)	Cancer	Noncancer HO ^c		
000	(µg/L)	1 x 10 ⁻⁶ Risk	HQ=1.0	Risk ^b			
1,1-Dichloroethane	4,900	2.8 ^d	3,800 ^d	2 x 10 ⁻³	1.3		
Acetone	22,000	NA	14,000		1.6		
Naphthalene	327	0.17 ^e	6.1	2 x 10 ⁻³	54		
ТВА	$2,200^{f}$	NA	NA	NA	NA		

Table J-1: Health Evaluation of OU2 Groundwater Protection Standards

Notes:

a. Current EPA RSLs, dated November 2015, are available at <u>http://www2.epa.gov/risk/risk-based-screening-table-generic-tables</u> (accessed 2/26/2016).

b. The cancer risks were calculated using the following equation, based on the fact that RSLs are derived based on 1×10^{-6} risk:

Cancer risk = (Cleanup goal \div Cancer-based RSL) $\times 10^{-6}$

c. The noncancer hazard quotient (HQ) was calculated using the following equation: HQ = cleanup goal ÷ noncancer based RSL

d. EPA has not established cancer and noncancer toxicity criteria for this chemical. However, EPA has adopted toxicity values developed by the California Environmental Protection Agency (CalEPA) for use in screening level evaluations.

e. EPA has not established cancer toxicity criteria for this chemical. However, EPA has adopted the cancer toxicity values developed by CalEPA for use in screening level evaluations.

f. Current Tier 1 PCL obtained at <u>http://www.tceq.texas.gov/remediation/trrp/trrppcls.html</u> (Accessed 3/4/2016).

NA = toxicity values not established by EPA

-- = cancer risk could not be calculated because the contaminant has not been classified as a carcinogen

Bold = cancer risk exceeds 1×10^{-4} or noncancer HQ exceeds 1.0

Table J-2: Health Evaluation of OU2 Soil Cleanup Levels

COC	Depth Interval	Cleanup Goal ^a	Indu	ustrial RSL ^b (mg/kg)	Cancer	Noncancer
	(feet)	(mg/kg)	1 x 10 ⁻⁶ Risk	HQ=1.0	Risk ^e	HQ ^a
Benzene	NA	36	5.1	420	7.1 x 10 ⁻⁶	0.086
Lead	NA	800		800 ^e		
Naphthalene	NA	190	17	590	1.1 x 10 ⁻⁵	0.32
Vinyl chloride	NA	10	1.7	370	5.9 x 10 ⁻⁶	0.027

Notes:

a. From Page 69 of the 2006 AROD.

b. Current EPA RSLs, dated November 2015, are available at <u>http://www2.epa.gov/risk/risk-based-screening-table-generic-tables</u> (accessed 2/26/2016).

c. Cancer risks calculated using the following equation, based on the fact that RSLs are derived based on 1 x 10^{-6} risk: cancer risk = (cleanup goal ÷ cancer-based RSL) × 10^{-6}

d. Noncancer HQ calculated using the following equation: $HQ = cleanup \text{ goal} \div noncancer-based RSL$

e. Noncancer and carcinogenic toxicity criteria have not been developed for lead; EPA evaluates lead exposure using blood-lead modeling.

HQ = hazard quotient

APPENDIX K – INTERVIEW FORMS

Petro-Chemical Systems, Inc. (Turtle	FYR Interview Form
Bayou) Superfund Site	
Site Name: <u>Petro-Chemical Systems, Inc.</u>	EPA ID No.: <u>TXD980873350</u>
<u>(Turtle Bayou)</u>	
Interviewer Name: <u>N/A</u>	Affiliation: <u>Skeo Solutions</u>
Subject Name: <u>Resident 1</u>	Affiliation:
Subject Contact	
Information:	
Time: <u>11:30 A.M.</u>	Date: <u>01/12/16</u>
Interview Location: <u>MW-109 Area</u>	
Interview Format (circle one): In Person	Phone Mail Other:

Interview Category: Residents

- 1. Are you aware of the environmental issues at the Site and what cleanup activities have occurred? *Yes.*
- 2. What is your general impression of the work conducted at the Site during the past five years? *Overall good, except the remediation activities may have created mounding near my septic tank so my septic tank backs up into my house during heavy rains.*
- 3. What effect has the Site had on the surrounding community, if any? *None*.
- 4. Are you aware of any community concerns regarding the Site or its operation and administration? If so, please provide details. *No*.
- 5. Have there been any problems with unusual or unexpected activities at the Site, such as emergency response, vandalism or trespassing? *Occasionally, there are hunters that trespass and dump trash.*
- 6. Do you feel well informed about the site's activities and progress? Yes, except I have not received a copy of the 2006 Residential Well Monitoring Report.
- 7. Are you aware of any contamination or additional dumping that has not been addressed? *No*.
- 8. Do you have a private well and if so, for what purposes is your private well used and what depth is this well? *Yes, but I do not use the water for drinking.*
- 9. Do you have any comments, suggestions or recommendations regarding any aspects of the project? *No.*

Petro-Chemical Systems, Inc. (Tur	tle FYR Interview Form
Bayou) Superfund Site	
Site Name: <u>Petro-Chemical Systems, I</u>	nc. EPA ID No.: <u>TXD980873350</u>
<u>(Turtle Bayou)</u>	
Interviewer Name: <u>Claire Marcussen</u>	Affiliation: <u>Skeo Solutions</u>
Subject Name:Resident 2	Affiliation:
Subject Contact	
Information:	
Time: <u>5:00 P.M.</u>	Date: <u>01/12/16</u>
Interview Location: <u>BDA area</u>	
Interview Format (circle one): <u>In Pers</u>	on Phone Mail Other:

Interview Category: Residents

- 1. Are you aware of the environmental issues at the Site and what cleanup activities have occurred? *Yes.*
- 2. What is your general impression of the work conducted at the Site during the past five years? *Seems ok. We are happy with the new road.*
- 3. What effect has the Site had on the surrounding community, if any? *None.*
- 4. Are you aware of any community concerns regarding the Site or its operation and administration? If so, please provide details. *No*.
- Have there been any problems with unusual or unexpected activities at the Site, such as emergency response, vandalism or trespassing? *Yes, hunters trespassing and poaching and leaving dead animals behind.*
- 6. Do you feel well informed about the Site's activities and progress? *Yes.*
- 7. Are you aware of any contamination or additional dumping that has not been addressed? *No.*
- 8. Do you have a private well? If so, for what purposes is your private well used and what depth is this well? *Yes, but we don't use it except for watering the animals.*

Do you have any comments, suggestions or recommendations regarding any aspects of the project? *No.*

Petro-Chemical Systems, Inc. (Turtle	Five-Year Review Interview Form
Bayou) Superfund Site	
Site Name: <u>Petro-Chemical Systems, Inc.</u>	EPA ID No.: <u>TXD980873350</u>
<u>(Turtle Bayou)</u>	
Interviewer Name:	Affiliation: <u>Skeo Solutions</u>
Subject Name: <u>Resident 3</u>	Affiliation:
Subject Contact Information:	
Time:	Date: <u>01/23/16</u>
Interview Location:	
Interview Format (circle one): In Person	Phone <u>Mail</u> Other:

Interview Category: Residents

- 1. Are you aware of the environmental issues at the Site and what cleanup activities have occurred? *Yes.*
- 2. What is your general impression of the work conducted at the Site during the past five years? *The maintenance is performed very efficiently, quietly and with little disruption to the residences along CR126.*
- 3. What effect has the Site had on the surrounding community, if any? *Unsure.*
- Are you aware of any community concerns regarding the Site or its operation and administration? If so, please provide details. No.
- 5. Have there been any problems with unusual or unexpected activities at the Site, such as emergency response, vandalism or trespassing? No.
- 6. Do you feel well informed about the Site's activities and progress? *Yes.*
- 7. Are you aware of any contamination or additional dumping that has not been addressed? *No.*
- 8. Do you have any comments, suggestions or recommendations regarding any aspects of the project? *No.*

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Superfund	Site				
Site Name:	Petro-Chemical	<u>Systems, Inc. (Turtle</u>	EPA ID) No.:	TXD980873350
	<u>Bayou)</u>				
Interviewer N	Name:		Affiliat	ion:	Skeo Solutions
Subject Name	e: <u>Joseph V</u>	Viley	Affiliat	ion:	<u>Kinder Morgan, Inc.</u>
Subject Cont	act Information:	joe_wiley@kindermor	gan.com		
Time:			Date:	02/02/1	<u>l6</u>
Interview Lo	cation:				
Interview For	rmat (circle one):	In Person	Phone	Ma	il Other: <u>Email</u>
Interview Ca	tegory:	O&M Contractor			

Petro-Chemical Systems Inc. (Turtle Bayou) Five-Vear Review Interview Form

1. What is your overall impression of the remedial activities at the Site? Remedial activities for the site are completed. Long-term groundwater monitoring and periodic site inspections are the only remaining routine site activities, along with maintenance of fences, mowing, repairs to wells, etc., as necessary.

- 2. What is your assessment of the current performance of the remedy in place at the Site? The in-situ chemical oxidation portion of the remedy appears to have satisfactorily addressed soil impacts in the Far West Road Area, and the remaining groundwater plume is very stable. The remedy appears to be accomplishing what was intended.
- 3. What are the findings from the monitoring data? What are the key trends in contaminant levels that are being documented over time at the Site? The key findings of the monitoring data are that the groundwater plume is stable. Contaminant concentrations are stable or declining.
- 4. Is there a continuous on-site O&M presence? If so, please describe staff responsibilities and activities. Alternatively, please describe staff responsibilities and the frequency of site inspections and activities if there is not a continuous on-site O&M presence.

There is no continuous on-site presence at the Site. Inspections are conducted twice each year, usually in June and December. The EPEC Polymers project manager meets with personnel from our consulting company (presently AECOM – Houston Office) and a site walk is conducted to check the status of each monitoring well (closed and locked), the fences, storage garage, gates, locks, etc. Any deficiencies are noted, photographed and subsequently addressed by the appropriate resource.

5. Have there been any significant changes in site O&M requirements, maintenance schedules or sampling routines in the last five years and have these changes been included in an update O&M Plan? If so, do they affect the protectiveness or effectiveness of the remedy? Please describe changes and impacts and date of latest O&M plan(s).

On November 5, 2015, EPA approved a modification to the Long-Term Groundwater Monitoring Plan, which eliminated sampling requirements for natural attenuation parameters and lead. This change will not affect the protectiveness of the remedy.

6. Please provide general summary of costs in table below:

Annual O&M Costs

Date Range	Total Cost (rounded to the nearest \$1,000)
2010	\$231,000

2011	\$143,000
2012	\$200,000
2013	\$59,000
2014	\$10,000
2015	\$32,000

7. Have there been unexpected O&M difficulties, challenges or costs at the Site in the last five years? If so, please provide details.

There have been no O&M issues in the past five years.

- 8. Since that 2011 FYR, not all institutional controls (ICs) have been addressed as summarized below. Please describe the restrictions and dates when ICs have been filed with the county. If ICs remain outstanding, clarify what ICs are needed and when they will be filed.
 - BDA: When did EPEC record a restriction of groundwater on Lots 5 and 8? *The groundwater restrictions for Lots 5 and 8 were recorded in Liberty County records on May 28,* 2008.
 - b. BDA: EPEC owns parcels 7, 11, 38 and 39. Have groundwater and land use restrictions been recorded? If so, when?
 - c. FWRA: EPEC owns lot 40. Have groundwater restrictions been recorded and if so when? *Groundwater restrictions have not yet been placed on Lot 40. However, that parcel will be restricted as part of the sale of the property as deed restrictions, or as a separate restrictive covenant prior to the sale of the property.*
 - d. FWRA: EPEC does not own Lot 31. However, groundwater restrictions are warranted. Have groundwater restrictions been recorded? If so, when? *Groundwater restrictions have not been placed on Lot 31. EPEC has been in discussions with the owners of Lot 31 regarding the placement of groundwater restrictions on a portion of that property.*
 - e. FWRA: EPEC purchased parcels 32, 34, 63, 81, 94, 107 and a portion of parcel 27. Have land use restrictions been recorded? If so, when? *Land and groundwater use restrictions have not yet been placed on the referenced parcels. Upon receipt from EPA of approval of the proposed revision to the previously accepted format, those restrictions will be placed, in the form of a restrictive covenant.*
 - f. FWRA: EPEC purchased the groundwater rights for parcels 47, 78, 83, 86, 87, 90, 91, 95 and 101. Have restrictions on excavation and construction been recorded? If so, when? There is no requirement for restriction of excavation or construction on any parcel that is not part of the Far West Road Area. There is only a requirement to restrict the use of groundwater in the S1 and S2 water-bearing zones within a 1,000-foot radius of the source area, which has been accomplished for these parcels by the purchase of water rights.
- Do you have any additional comments, suggestions or recommendations regarding O&M activities and schedules at the Site? No other comments.

Bayou) Superfund Site	
Site Name: <u>Petro-Chemical Systems, Inc.</u> EPA ID No.: <u>TXD980873350</u>	
(Turtle Bayou)	
Interviewer Name: Affiliation: <u>Skeo Solutions</u>	
Subject Name: <u>Audrey Kirtley</u> Affiliation: <u>TCEQ</u>	
Subject Contact <u>audrey.kirtley@tceq.texas.gov</u>	
Information:	
Time: <u>Date:</u> <u>01/22/16</u>	
Interview Location:	
Interview Format (circle one): In Person Phone Mail Other: <u>Email</u>	

Interview Category: State Agency

1. What is your overall impression of the project, including cleanup, maintenance and reuse activities (as appropriate)?

The Site appears to be well maintained. The residents in the area seem well informed about the Site. There are posted signs in place with contact information. The fences appear to be secure overall but there are indications of trespassing on the Site.

- 2. What is your assessment of the current performance of the remedy in place at the Site? The TI boundaries in place are suitable. There may be some areas in which the TI boundaries need to be extended further. There is a large network of groundwater monitoring wells delineating the contaminated groundwater in each affected groundwater bearing unit. Additional assessment in the MW-109 Area will be necessary.
- 3. Are you aware of any complaints or inquiries regarding site-related environmental issues or remedial activities from residents in the past five years? A resident called TCEQ in January 2015 because she was trying to sell her property located next to the Site. She claimed the potential purchaser was unable to gain access to her land because the Lyondell gates were locked. She was upset that the potential purchaser cancelled their sale after seeing hazardous waste warning signs on the adjacent property. *TCEQ* staff referred her to EPA to discuss further.
- 4. Has your office conducted any site-related activities or communications in the past five years apart from standard communications? If so, please describe the purpose and results of these activities. TCEO provided technical reviews of documents submitted by the PRP and Trustee. TCEO participated in meetings with EPA's remedial project manager and site PRP and Trustee..
- 5. Are you aware of any changes to state laws that might affect the protectiveness of the Site's remedy? No.
- 6. Do you feel that the recommendations from the 2011 FYR have been sufficiently addressed? Besides the completion of filing of institutional controls at the Site, many of the 2011 recommendations have been addressed.
- 7. Are you comfortable with the status of the institutional controls at the Site? If not, what are the associated outstanding issues?

TCEQ has not received the Institutional Controls Plan yet to evaluate the status of the institutional controls at the site. TCEO would like to receive a projected timeline for completion of filing the necessary institutional controls. TCEO would also like information regarding which off-site properties need institutional controls in place.

- 8. Are you aware of any changes in projected land use(s) at the Site? *No.*
- 9. Do you have any additional comments, suggestions or recommendations regarding the management or operation of the Site's remedy? *No.*

Petro-Chemical Systems, Inc. Superfund Site	Five-Year F	Review Interview Form
Site Name: <u>Petro-Chemical Systems, Inc.</u>	EPA ID No.: T	<u>XD980873350</u>
Interviewer Name: <u>N/A</u>	Affiliation: <u>S</u>	<u>keo Solutions</u>
Subject Name: <u>Angela E. DeDolph</u>	Affiliation: <u>R</u>	<u>Ramboll Environ</u>
Subject Contact Information: adedolph@ramboll.c	om	
Time: <u>N/A</u>	Date: 2/24/201	<u>6</u>
Interview Location: <u>N/A</u>		
Interview Format (circle one): In Person	Phone Mail	(Other: Email)
Interview Category: O&M Contractor		

1. What is your overall impression of the remedial activities at the Site? Active remedial activities were completed before Ramboll Environ began working at the site, so the comments provided below are focused on the current activities, which include long-term monitoring and maintenance in support of a Technical Impracticability waiver granted to the Site. The remedy is performing as intended and with the planned establishment of land use restriction institutional controls, the remedy

should be protective of human health and the environment.

- 2. What is your assessment of the current performance of the remedy in place at the Site? *The remedy in place at the Site is performing as anticipated. The existing groundwater contamination has been delineated and the impacted areas do not appear to be expanding. The soil has been remediated to the extent that it does not pose a direct contact risk.*
- 3. What are the findings from the monitoring data? What are the key trends in contaminant levels that are being documented over time at the Site? *The monitoring data demonstrate that existing groundwater contamination has been delineated and the impacted areas do not appear to be expanding.*
- 4. Is there a continuous on-site O&M presence? If so, please describe staff responsibilities and activities. Alternatively, please describe staff responsibilities and the frequency of site inspections and activities if there is not a continuous on-site O&M presence.

There is not a continuous on-site O&M presence. The on-Site activities include the following:

- Once per quarter, there is a maintenance event at the site that generally takes one week. The maintenance activities include mowing, fence repair, and removal of downed trees, as needed to maintain the physical access restrictions at the Site and to keep interior portions of the Site accessible for periodic monitoring.
- Site inspections are performed once per quarter and generally take one day to complete. They are documented in a quarterly site inspection report.
- Groundwater monitoring is performed semi-annually. The length of sampling events varies from one to ten days depending on the number of wells for the respective sampling event.
- 5. Have there been any significant changes in site O&M requirements, maintenance schedules or sampling routines in the last five years and have these changes been included in an update O&M Plan? If so, do they affect the protectiveness or effectiveness of the remedy? Please describe changes and impacts and date of latest O&M plan(s).

An updated plan for monitoring of the site has been prepared and is documented in the 2016 Long Term Monitoring Plan prepared by Ramboll Environ, dated January 2016. A West Road Slurry Wall Operations and Maintenance Plan dated February 2016 was prepared by Ramboll Environ. A draft Temporary RCRA Storage Facility Operations and Maintenance Plan has been prepared and is currently under revision. A revised version is expected to be completed in 2016. 6. Please provide general summary of costs in table below:

Annual O&M Costs

Date Range	Total Cost (rounded to the nearest \$1,000)		
May to	\$574,000		
December			
2010			
2011	\$806,000		
2012	\$1,010,000		
2013	\$591,000		
2014	\$369,000		
2015	\$507,000		

- Have there been unexpected O&M difficulties, challenges or costs at the Site in the last five years? If so, please provide details. *There have not been unexpected O&M difficulties.*
- 8. What is the status of the well abandonment program and removal of leachate from the sumps at the MWA landfill?

The well abandonment program was completed in December 2015 with the exception of once well (MW-063) located in the Main Waste Area that was not accessible due to wet conditions at the Site and three wells (MW-011, MW-048, and MW-054) that are not located on Trust owned property for which access agreements have not been obtained. A draft plan for pilot testing the removal of leachate from the sumps at the MWA landfill has been prepared and will be implemented when the plan and budget have been approved, which expected to occur in 2016.

What additional institutional controls (ICs) been established since the 2011 FYR? Please include actions and dates.
 No institutional controls have been established since the 2011 EVB.

No institutional controls have been established since the 2011 FYR.

- 10. What are the outstanding issues that need to be addressed to ensure all ICs are in place at the WRA, MWA, OTA and EA (Please describe actions completed with dates)? *The land use restrictions need to be established for the various areas of the Site. Establishment of land use restrictions are scheduled to be implemented this year in accordance with an Institutional Controls Plan, which is in the process of being drafted.*
- Do you feel that the recommendations from the 2011 Five Year Review have been sufficiently addressed?
 A majority of the recommendations have been sufficiently addressed. The exceptions are the establishment of institutional controls and the finalization of the O&M Plan for the Temporary RCRA Storage Facility (including appropriate management of leachate).
- 12. Do you have any additional comments, suggestions or recommendations regarding O&M activities and schedules at the Site?

No additional comments.