

MEMORANDUM

То:	Valmichael Leos and Barbara Nann	Date:	February 15, 2013
	U.S. Environmental Protection Agency		
From:	John Laplante, John Verduin, Wendell Mears, and David Keith, Anchor QEA	Project:	090557-01
Cc:	Gary Miller, USEPA		
	Philip Slowiak, IP		
	March Smith, MIMC		
	David Moreira, MIMC		
Re:	Post-TCRA Quarterly Inspection Report - January 2013 Inspection		

Introduction

This document reports the results of the January 2013 quarterly inspection of the armored cap cover, fencing, and signage installed for the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (TCRA Site).

Background

The TCRA was implemented by International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) under an Administrative Settlement Agreement and Order on Consent (AOC) with the U.S. Environmental Protection Agency (USEPA) – Docket No. 06-12-10, effective May 17, 2010. A full description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Revised Draft Final Removal Action Completion Report¹ (RACR; Anchor QEA 2012)

¹ David Keith, the Respondents' the Project Coordinator, received a RACR (in the form issued by USEPA) from Valmichael Leos via email on August 15, 2012; the appendices to the RACR including the OMM Plan, was not provided to Dr. Keith as part of the document. In the OMM Plan had been previously approved by USEPA (in an email from Mr. Leos dated January 18, 2012), it is assumed to remain unchanged. Respondents reserve all rights related to the changes made by USEPA to the Revised Draft Final RACR, submitted by Respondents to USEPA on March 9, 2012.

The inspection summarized in this report was conducted in accordance with the schedule established in the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2012)². The OMM Plan specifies the timing, pertinent items, tolerances, and procedures for inspection, maintenance, and repair of the armored cap protective cover, fencing, and signage installed for the TCRA Site (Figure 1).

Monitoring

The purpose of this report is to document the January 2013 quarterly inspection of the armored cap cover, fencing, and signage installed as part of the TCRA, as well as corrective actions taken (if any), following the inspection. The inspection, which commenced on January 11, 2013 and was completed on January 18, 2013 included evaluation of the TCRA elements referenced below:

- Visual inspection of the security fence and signage surrounding the TCRA Site.
- Visual inspection of the armored cap located above the water surface.
- Visual confirmation that waste materials are not being actively eroded into the San Jacinto River.
- Collection of hydrographic and topographic survey data of the armored cap to compare the current elevations with the survey performed during the October 2012 quarterly inspection.
- Manual probing of armored cap thickness at contiguous areas identified by the monitoring survey as more than 6 inches lower in elevation than in the October 2012 quarterly inspection survey.

Visual Inspection

The visual inspection included observing the current conditions of the perimeter fence, warning signs, and the portion of the armored cap visible above the water line of the San Jacinto River. Figure 2 displays the location of the perimeter fence and the stand-alone signs around the armored cap (additional signs are affixed directly onto the perimeter fence). An initial visual inspection was performed on January 11, 2013. Photographs of conditions observed during the visual inspection are provided in Appendix A (Figures A-1 to A-7).

² The OMM Plan was attached to the Draft Final RACR, submitted to USEPA on November 22, 2011, and authorization to implement the OMM Plan was contained in an email from USEPA dated January 18, 2012. The OMM Plan was also attached as an appendix to the Revised Draft Final RACR submitted to USEPA on March 9, 2012.

There was a low tide during the January 11, 2013 visual inspection because of northerly winds. This low tide exposed two localized areas of the TCRA armored cap cover with less than 12 inches of stone cover thickness. The underlying geotextile layer in those areas was intact and there was no evidence that any of the underlying materials were or had been exposed. The USEPA was notified of this condition through a phone conversation and submission of a notification letter on Tuesday, January 15, 2013. The Respondents conducted a field investigation during a low-tide event on Thursday, January 17, 2013 collecting topographic and probing data that identified three additional areas that had less than 12 inches of stone cover thickness and would require maintenance. One of the three additional areas also required geotextile placement over an approximate 2 foot by 2 foot area. Further phone communications with the USEPA took place on Thursday, January 17, 2013, and an additional written notification was submitted to USEPA on January 18, 2013. The Respondents continued to evaluate the TCRA cap during the low tide conditions that existed on January 17 and January 18, 2013. The low tide event on Friday, January 18, 2013 was the lowest of any of the inspection days, and was at -2 foot mean sea level (MSL)³.

A summary of each facet of the visual inspection is provided in the following sections.

Armored Cap

Photographs of the armored cap from the inspection event are provided in Appendix A (see photographs 8, 9, 10, 14, and 16 through 25). All of the visible portions of the armored cap were observed to be intact, with the exception of localized areas of the stone cover in the Eastern Cell. Substantial amounts of recently deposited sediment and biological growth (oysters, clams, and algae) were also observed over much of the Eastern Cell.

The Respondents completed field inspections and evaluations necessary to address this maintenance issue on January 17, 2013 and January 18, 2013. The Respondents prepared and submitted to the USEPA a Maintenance Plan on January 23, 2013, which was approved by the USEPA pursuant to an email dated January 24, 2013. The Respondents initiated and completed all necessary maintenance to the armored stone cover layer. As detailed in the attached Maintenance Completion Report (Appendix B), preventative maintenance activities

³ Tide elevations are downloaded from the Texas Coastal Ocean Observation Network (TCOON) Lynchburg gauge.

were also carried out for a small area in the Western Cell, and repairs were completed on sections of the perimeter fence.

All other portions of the armored cap that were visible during the inspection were observed to be intact, with no breaches or other damage. No movement or erosion of waste materials into the San Jacinto River was observed at any location during the visual inspection.

Perimeter Fencing

The perimeter fencing (Figure 2) on the west and east banks of the San Jacinto River was visually inspected for breaches or other signs of damage on January 11, 2013 and again on January 28, 2013 during the maintenance activities for the TCRA armored cap cover. No breaches or other signs of fence damage were observed during the January 11, 2013 inspection for any of the three sections of the fence: the east bank, the west bank on the north side of I-10, or the west bank on the south side of I-10. Incidental damage to the fence post at the east bank access gate was observed; however, there was no indication of a breach or deficiency in the TCRA Site security fencing. For examples, see Photographs 1 through 5 in Appendix A. Subsequent inspections by the USEPA and the Respondents prior to and during the maintenance event found two breached areas along the southern fence line parallel to I-10 on the west bank of the San Jacinto River. Repairs to these areas were included in the maintenance event.

The portion of the fence installed along the south boundary of the San Jacinto River Fleet (SJRF) property is not included in the fencing inspection, as it is currently an active facility that conducts daily security checks, as required by the U.S. Coast Guard and Transportation Security Administration, for an active maritime fleeting area.

Signage

"Danger" and "No Trespassing" signs are posted at regular intervals on the perimeter fencing surrounding the Site. For examples, see Photographs 1, 3, and 4 in Appendix A. These signs were observed to be in place during the January 11, 2013 inspection.

A total of fifteen "Danger" and "No Trespassing" signs were installed at the TCRA Site around the perimeter of the land portion of the TCRA Site; the signs are mounted on steel posts and set in concrete pads. For examples, see Photographs 13 and 15 in Appendix A. These signs were observed to be in place during the January 11, 2013 inspection. These signs are intended to face the San Jacinto River to deter water-based entry to the TCRA Site. Several of these signs had rotated out of proper alignment due to the wind; the affected signs were re-aligned to the intended viewing perspective.

Three USEPA Public Notice signs are present around the TCRA Site located: 1) near the gate entry point for the perimeter fence north of I-10; 2) near a gate entry point south of I-10; and 3) at the end of the TxDOT right-of-way north of I-10 near the San Jacinto River. For an example, see Photograph 6 in Appendix A. These three signs were observed to be in place and undamaged.

Table 1 summarizes the condition of the TCRA Site signage described in this section.

Task	Status	
	Completed	Date
Perimeter Fence Visually inspect the perimeter fencing on the east and west sides of the San Jacinto River.	Yes	1/11/2013
"Danger" and "No Trespassing" Signs Visually inspect the 15 signs to verify that they remain in place.	Yes	1/11/2013
USEPA Public Notice Signs Visually inspect the 3 signs to verify that they remain in place.	Yes	1/11/2013

Table 1 TCRA Perimeter Fencing and Sign Inspection Punch List

Surveys

Portions of the armored cap above the water surface or at a water depth too shallow to access by boat were surveyed using land-based topographic survey techniques. A bathymetric survey was performed for the portions of the armored cap below the water surface and accessible by boat. The surveyor followed the track line spacing, measurement intervals, and accuracy requirements detailed in the OMM Plan. A small area in the intertidal zone was not safely accessible by either topographic or bathymetric methods (Figure 3). Seasonally low tides with north winds during the month of January prevented safe access by boat to the areas identified on Figure 3. Algal and crustacean growths in these small areas were hazardous for the surveyor to access by foot. Visual inspection in this area indicates that no movement of the armored cap has occurred in these areas.

Survey Tolerance Requirements

The OMM Plan requires that each survey be compared with the prior completed survey using the following criteria:

- 1. Areas with elevations that are within 6 inches of the previous survey require no action.
- 2. Contiguous areas with elevation changes exceeding plus or minus 6 inches triggers a review of the survey benchmarks for accuracy or movement.
- 3. Areas where surveyed elevations are 6 inches higher or lower than the prior survey for a contiguous area larger than 30 feet by 30 feet will require probing to measure the cap thickness.

Survey Results

The survey for this quarterly inspection event was conducted by Hydrographic Consultants, Ltd. Hydrographic survey data were collected from January 22, 2013 to January 28, 2013; upland topographic data were collected from January 3, 2013 to January 30, 2013. The topographic survey required additional days to complete in order to accommodate the maintenance event, and the hydrographic survey was offset as a result of the consistently low tide conditions at the TCRA Site during the month of January 2013. Figure 3 displays the results of the completed survey.

This survey dataset was compared to the dataset from the previous quarterly inspection survey⁴ to evaluate the differences in the top of the armor cap elevation between surveys. These differences are shown on Figure 3. The survey results indicate there appears to be a substantial amount of new material being deposited on the surface armored cap, as may be

⁴ Hydrographic Consultants, Ltd. conducted the previous quarterly inspection survey; that survey event was completed October 2, 2012.

expected in a fluvial system like the San Jacinto River. These results are also consistent with visual observations of the normally submerged portions of the Eastern Cell. Manual probing of armored cap thickness is required at areas identified by the topographic or bathymetric surveys as more than 6 inches lower in elevation than during the prior survey over contiguous areas of 30 foot by 30 foot. Based on the results of the hydrographic and bathymetric surveys, additional probing was not required or initiated on this basis.

Repairs to TCRA Construction Elements

As discussed above, the only TCRA construction elements found to be deficient from the conditions observed during the January 2013 inspections were the localized areas of the armored stone cover layer in the Eastern Cell and portions of the TCRA Site fencing.

The areas in the Eastern Cell were characterized by reduced stone cover thickness or other conditions, as described in the TCRA Inspection Repair Report. While the maintenance work was being performed, one small area required some geotextile repair. The TCRA Site fencing deficiencies identified along the western bank of the San Jacinto River consisted of cut chain link and bent/mangled bottom sections. All maintenance activities for the TCRA armor stone layer and repair activities for the deficient areas of TCRA Site security fencing have been completed. These activities are detailed in the attached Maintenance Completion Report (Appendix B).

Inspection Summary

The visual inspection event on January 11, 2013 did not identify damaged or otherwise deficient areas in the perimeter fence or signage. Incidental damage to the fence center post at the eastern gate was noted, but did not require action, as it was not identified as a breach in the fencing. However, additional inspections of the TCRA Site fencing during the armored cap survey and maintenance event identified two breaches in the perimeter fence. These two areas were repaired by the Respondents' Fence Contractor; all repair activities were completed by February 6, 2013. Details regarding the TCRA Site fencing repairs are provided in the attached Maintenance Completion Report; see photographs 26 through 28 of Appendix A for examples of the fencing repairs.

During the visual inspection and subsequent thickness probing surveys of the armored cap, five localized deficiencies were noted for the stone cover in the Eastern Cell; these deficiencies have been repaired as described in the Maintenance Completion Report (Appendix B). During maintenance activities, the on-site team was notified of a potential maintenance area near the northwest corner of the Western Cell. This area was identified as a location for preventative maintenance and has been repaired as described in the Maintenance Completion Report (Appendix B).

No deficiencies were identified by the topographic or bathymetric surveys.

List of Figures

Figure 1 - Vicinity Map Figure 2 – Fence and Warning Sign Layout Figure 3 – January 2013 Quarterly Inspection Survey

List of Appendices

Appendix A – Inspection Photographic Log Appendix B – Maintenance Completion Report

References

- Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River
 Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency
 (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and
 International Paper Company. November 2010.
- Anchor QEA, 2011. Removal Action Work Plan, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.
- Anchor QEA, 2012. Revised Draft Final Removal Action Completion Report, San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency (USEPA) Region 6. Revised March 2012.
- USEPA, 2010. Administrative Settlement Agreement and Order on Consent for Removal Action. U.S. Environmental Protection Agency Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company & McGinnes Industrial Management Corporation, Respondents.

FIGURES

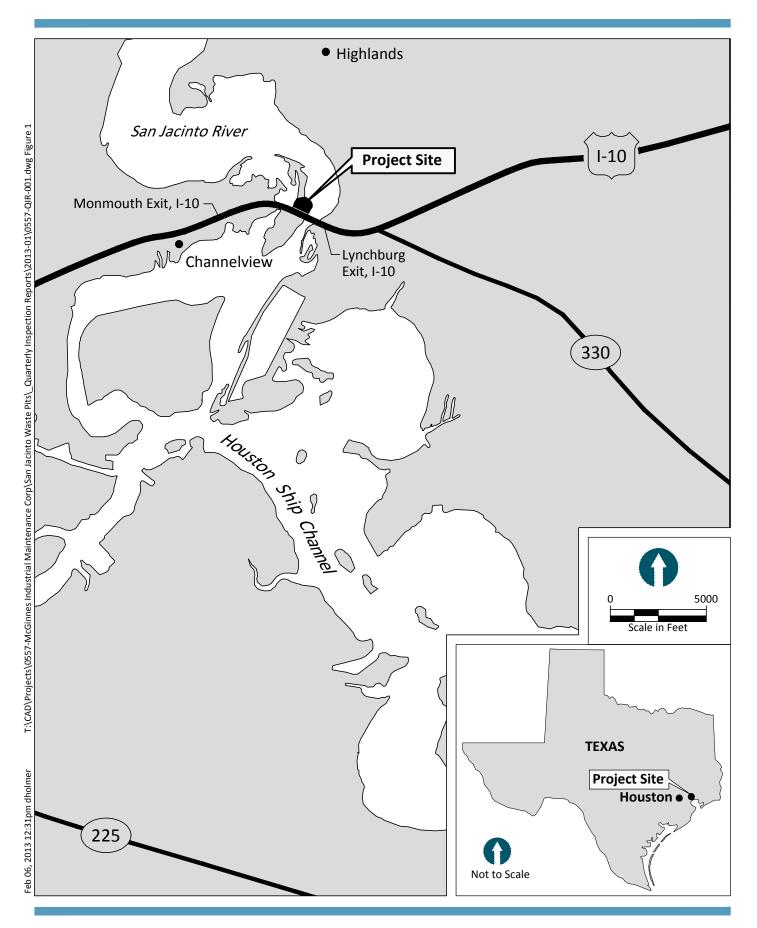
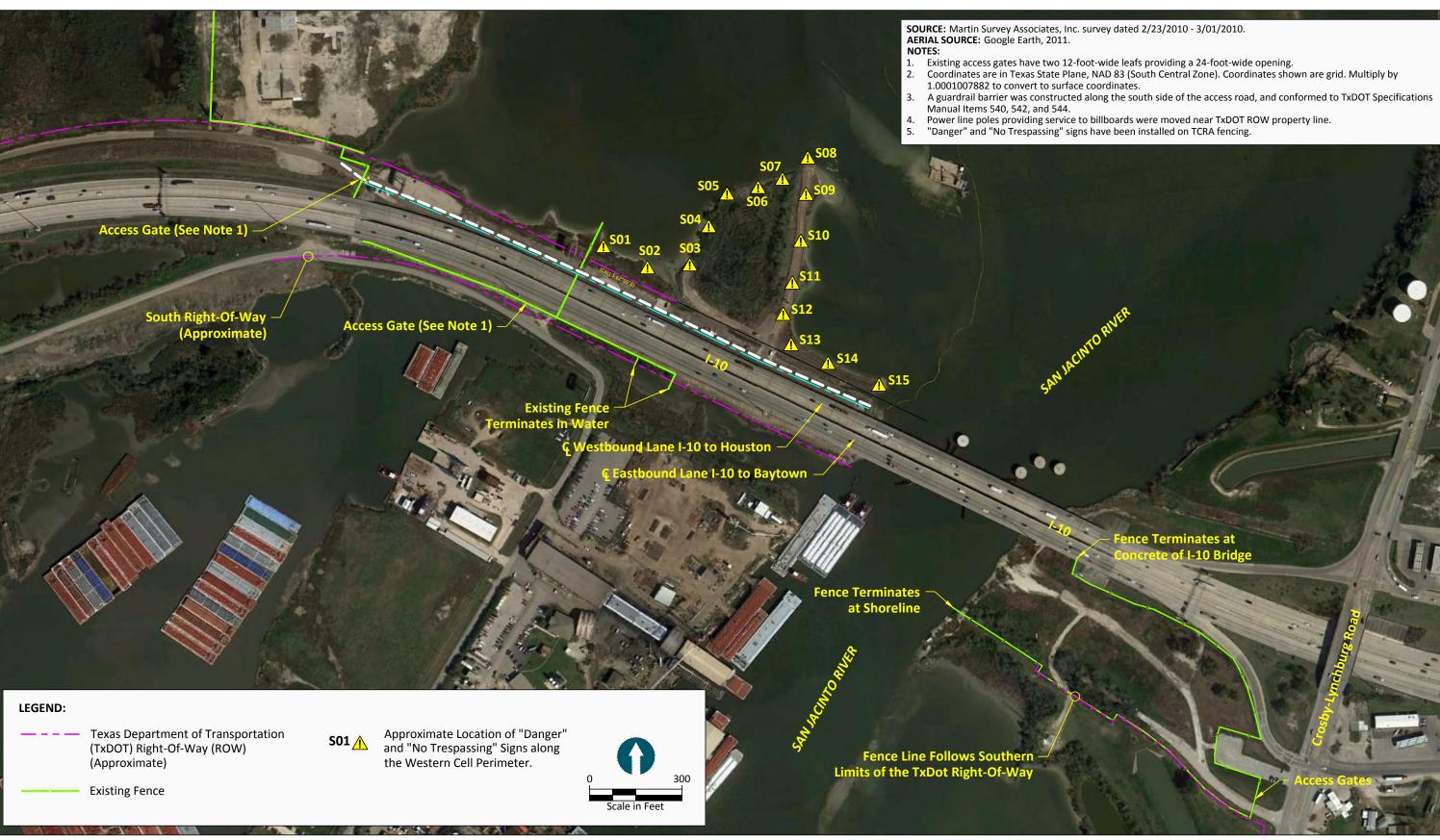




Figure 1 Vicinity Map Post TCRA Quarterly Inspection (January 2013) San Jacinto River Waste Pits Superfund Site





Existing access gates have two 12-foot-wide leafs providing a 24-foot-wide opening.
 Coordinates are in Texas State Plane, NAD 83 (South Central Zone). Coordinates shown are grid. Multiply by 1.0001007882 to convert to surface coordinates.

Terminates at

-10 Brid

Figure 2 Fence and Warning Sign Layout Post TCRA Quarterly Inspection (January 2013) San Jacinto River Waste Pits Superfund Site







	Existing Contour (1 Foot Interval)		
B/C	Armored Cap Type and Boundary		
	Historic Impoundment Limits		
	Visual Survey Only		
	> 1.0 Foot Increase		
	0.5 Foot Increase to 1.0 Foot Increase		
	0.5 Foot Increase to 0.5 Foot Decrease		
	0.5 Foot Decrease to 1.0 Foot Decrease		
	> 1.0 Foot Decrease		
	Example 30'x30' Area		

SOURCE: Drawing prepared from surveys provided by Hydrographic Consultants dated October 2012 and January/February 2013. HORIZONTAL DATUM: Texas State Plane South Central, NAD83, U.S. Feet. VERTICAL DATUM: NAVD 88.

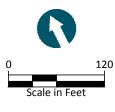


Figure 3

January 2013 Quarterly Inspection Survey Post TCRA Quarterly Inspection (January 2013) San Jacinto River Waste Pits Superfund Site

APPENDIX A INSPECTION PHOTOGRAPHIC LOG



Photo 01: Warning sign and perimeter fence south of I-10 on west bank (view northeast)



Photo 02: Public notice sign south of I-10 (view north)



Photo 03: TCRA Site security fencing on the east bank (view north)



Photo 04: Access gate on east bank (view northwest)







Photo 05: Bent center post of east access gate (view east)



Photo 06: Public notice sign north of I-10 at main access gate (view southeast)



Photo 07: TCRA Site access gate (view east)



Photo 08: Interior of Western Cell with standing water (view northeast)



Figure A-2 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site



Photo 09: Eastern Cell as viewed from the intersection of the central and southern berms (view northeast)



Photo 10: Northern face of southern berm and warning signs (view east)



Photo 11: Public notice sign north of I-10 along southern berm (view southwest)



Photo 12: Thin armor cap area identified during visual inspection (view north)



Figure A-3 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site



Photo 13: Warning sign at southern end of the central berm (view northwest)



Photo 15: Warning sign and eastern face of the central berm (view northwest)



Photo 14: Low tide conditions in the Eastern Cell; note sedimentation and biological growth (view east)



Photo 16: Areas (foreground and background) of thin armor cap area and exposed geotextile identified during visual inspection (view northwest)



Figure A-4 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site



Photo 17: Background location from Photo 16 of thin armor cap area and exposed geotextile identified during visual inspection (view southwest)



Photo 18: Warning buoy near the northern end of the Eastern Cell (view northwest)



Photo 19: Northern portion of the Eastern Cell; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view west)



Photo 20: Northern end of the central berm; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view north)



Figure A-5 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site



Photo 21: Western edge of the Western Cell (view south)



Photo 22: Interior view of the Western Cell with standing water in the background along the central berm (view southeast)



Photo 23: Warning sign on west berm (view east)



Photo 24: Area of Eastern Cell showing biologic growth and sediment deposition (view northeast)



Figure A-6 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site



Photo 25: Southern end of the west berm; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view southwest)



Photo 27: Added lower supports on adjacent panels to secure fence fabric and barb wire (view northwest)



Photo 26: Repaired fence fabric, south alignment, west bank of the San Jacinto River I-10 crossing (view north)



Photo 28: New gate center post installation, east bank (view north)



Figure A-7 Site Photographs Post TCRA Inspection Report (January 2013) San Jacinto River Waste Pits Superfund Site

APPENDIX B MAINTENANCE COMPLETION REPORT



MEMORANDUM

То:	Valmichael Leos, Barbara Nann, USEPA	Date:	February 15, 2013	
From:	Wendell Mears, David Keith, John Verduin, and John Laplante,	Project No.:	090557-01	
Cc:	Anchor QEA, LLC Dave Moreira and Andrew Shafer, MIMC			
	Phil Slowiak, IP			

Subject: San Jacinto River Waste Pits TCRA Maintenance Completion Report

INTRODUCTION

This document provides a summary of recent maintenance activities related to the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (TCRA Site). Maintenance activities on the armored cap protective cover were conducted from January 25, 2013 through January 31, 2013 and to the fence system on February 5 and 6, 2013.

BACKGROUND

The TCRA was implemented by International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) under an Administrative Settlement Agreement and Order on Consent (AOC) with the U.S. Environmental Protection Agency (USEPA) – Docket No. 06-12-10, effective May 17, 2010 (USEPA 2010). A description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Draft Final Removal Action Completion Report¹ (RACR; Anchor QEA 2012)

¹ David Keith, the Respondents' the Project Coordinator, received a RACR (in the form issued by USEPA) from Valmichael Leos via email on August 15, 2012; the appendices to the RACR including the OMM Plan, was not provided to Dr. Keith as part of the document. In the OMM Plan had been previously approved by USEPA (in an email from Mr. Leos dated January 18, 2012), it is assumed to remain unchanged. Respondents reserve all rights related to the changes made by USEPA to the Revised Draft Final RACR, submitted by Respondents to USEPA on March 9, 2012.

The inspection and maintenance activities summarized in this document were conducted in accordance with the schedule established in the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2012)². The OMM Plan specifies the timing and procedures for inspecting and repairing the armored cap cover, fencing, and signage installed for the TCRA.

The inspection commenced on Friday, January 11, 2013. The Respondents identified a need for maintenance within two localized areas of the TCRA cap where geotextile was visible. The USEPA was notified of this condition through a phone conversation and the submission to USEPA of a notification letter on Tuesday, January 15, 2013 (See Attachment 1). The Respondents conducted a field investigation during a low-tide event on Thursday, January 17, 2013 collecting topographic and probing data that identified three additional maintenance locations. Notification was provided to USEPA through an additional phone conversation and notification letter on Friday, January 18, 2013 (See Attachment 1). After further verbal conversation with the USEPA on Thursday, January 17, 2013 the Respondents continued to evaluate the TCRA cap during the low tide conditions that existed during the next two days. The low tide event on Friday, January 18, 2013 was intensified by a northwesterly weather front passing the Site, resulting in a -2 foot mean sea level (MSL) tide³.

Areas of the armored cap cover that had been installed via water-based equipment as part of the TCRA were verified post-construction by hydrographic survey and thickness probing on a 30 foot by 30 foot grid, without the benefit of a visual assessment because of water levels. Low tides during the January 2013 inspection exposed areas of the Eastern Cell that are normally submerged and allowed for the Respondents to visually inspect and verify the armored cap cover in these areas.

Using the data collected on Thursday, January 17, 2013 and Friday, January 18, 2013 five armored cap maintenance areas (MA) were identified in the Eastern Cell of the TCRA (Figure 1). A TCRA Cap Maintenance Plan was developed that utilized materials stockpiled

² The OMM Plan was attached to the Draft Final RACR, submitted to USEPA on November 22, 2011 and authorization to implement the OMM Plan was contained in an email from USEPA dated January 18, 2012. The OMM Plan was also attached as an appendix to the Revised Draft Final RACR submitted to USEPA on March 9, 2012.

³ Tide elevations are downloaded from the Texas Coastal Ocean Observation Network (TCOON) Lynchburg gauge.

for maintenance of the TCRA cover (Anchor QEA 2012). These materials had been ordered, tested, and stockpiled as part of the TCRA construction project. The TCRA Cap Maintenance Plan was submitted to the USEPA on Wednesday, January 23, 2013 (Attachment 2) and approved by USEPA in an email dated Thursday, January 24, 2013 (Attachment 3). In accordance with the OMM Plan, the Respondents' contractor, USA Environment, LP (Contractor), mobilized to the Site on Friday, January 25, 2013 to begin maintenance activities.

ACTIVITIES

Pre-Mobilization and Mobilization Activities – Friday, January 25, 2013 to Monday, January 28, 2013

Pre-mobilization activities included reviewing and updating the Contractor's Health and Safety Plan (HASP), insurance certificates; notifying and coordinating with the Texas Department of Transportation (TxDOT); ordering materials and equipment; and notifying the USEPA. Delivery of equipment and materials to the TCRA Site occurred on January 28, 2013. Photographs and a log of activities are provided in Attachment 4 (Mobilization, Maintenance, and Demobilization Daily Reports). The main components and equipment deliveries that were completed were:

- Completed delivery of two Skid Steer loaders to the Site
- Completed delivery of a wheeled front end loader at the stockpile area
- Completed preconstruction topographic survey of MA 1
- Delivered "C" rock to the temporary stockpile area

Maintenance Activities – Monday, January 28, 2013 to Wednesday, January 30, 2013

Construction activities began each day with a tailgate safety meeting. Dump trucks delivered "C" and "D" rock from the off-Site stockpile to the TCRA Site, end dumping the rock onto the temporary stockpile area in the southeast corner of the Western Cell. MA 1 was partially completed on Monday, January 28, 2013. A surveyor was present during the maintenance event to mark, survey, and probe the maintenance areas. In addition to the maintenance activity at the TCRA Site, based on a recommendation from the USEPA, the San Jacinto River east bank areas were inspected for evidence of occupancy. An area in which there was evidence of the presence of trespassers was identified under the east bound lane of Interstate 10. Evidence of heat or cooking fires was found, in addition to clothing, food, and bedding.

A local TxDOT representative was notified for appropriate action. The USEPA representative who was on-site that day was advised of the results of the inspection and the action that had been taken.

On Wednesday, January 30, 2013 drizzling rain, sustained winds from the south, and the resultant high tides hampered maintenance activities; repairs to MA 1 were completed and haul routes to the remaining MAs were prepared. In addition to a reported fence breach from the previous week's inspection, a second fence breach and entry point was identified. The fence contractor National Fence Company (NFC; Fence Contractor), was notified, and a visit to inspect and repair the fencing was scheduled for the following day.

A northwesterly frontal system and low tides resulted in very low water levels on Wednesday, January 30, 2013. Cap maintenance materials were loaded, transported, and placed atop or near the MAs in the Eastern Cell with the Skid Steers, as outlined in the TCRA Cap Maintenance Plan (See Attachment 2). Repairs to MAs 1, 2, 3, and 5 were completed using per the TCRA Cap Maintenance Plan. A long reach excavator on mats traversed the cap from the central berm to an area near MA 4. The Skid Steers transported aggregate to the excavator, which placed the material in the MA. As each MA was completed, the surveyor verified that the required thickness was placed per the OMM Plan via survey and probing. Following the completion of all repairs to the MAs, the excavator and Skid Steers were removed from the Eastern Cell.

During the work day on January 30, 2013 a NFC representative examined the breaches in the perimeter fencing to develop plans for maintenance of the fence. Subsequently, two panels were repaired and three additional panels were reinforced. The east access gate center post was also replaced due to minor damage.

Preventative Maintenance Activities – Wednesday, January 30, 2013

While completing planned maintenance, the on-Site team was notified by USEPA of a potential MA near the northwest corner of the Western Cell. After further review on-Site, an exposed geotextile fabric that was part of an overlap with another panel and armored cap was covered with 12 to 18 inches of the remaining "C" and "D" rock. The overlap covered existing armor rock and fabric—the additional rock was placed to cover the overlapping

fabric. This MA was delineated before and after placing the additional aggregate and is shown as MA 6 on Figure 1.

Demobilization Activities – Thursday, January 31, 2013

After a brief tailgate safety meeting, the Contractor, USA, loaded the mats, Skid Steers, and excavator for transport. The TxDOT right-of-way was inspected for damage and debris. All actions within the TCRA Site were completed on Thursday, January 31, 2013.

Fence Maintenance Activities – Tuesday, February 5 to Wednesday, February 6, 2013

After a brief safety and scope meeting on Tuesday, February 5, 2013, the Fence Contractor, NFC, started maintenance on the security fencing. The required maintenance items were completed on Wednesday, February 6, 2013. Barbed wire was added at the base of the fence to help preclude and discourage future entry to the TCRA Site.

ATTACHMENTS

Figure 1 – TCRA Maintenance Area Locations
Attachment 1 – Respondents' Notification of Deficiency to USEPA
Attachment 2 – Respondents' TCRA Cap Maintenance Plan
Attachment 3 – USEPA TCRA Cap Maintenance Plan Approval
Attachment 4 – Mobilization, Maintenance, and Demobilization Daily Reports

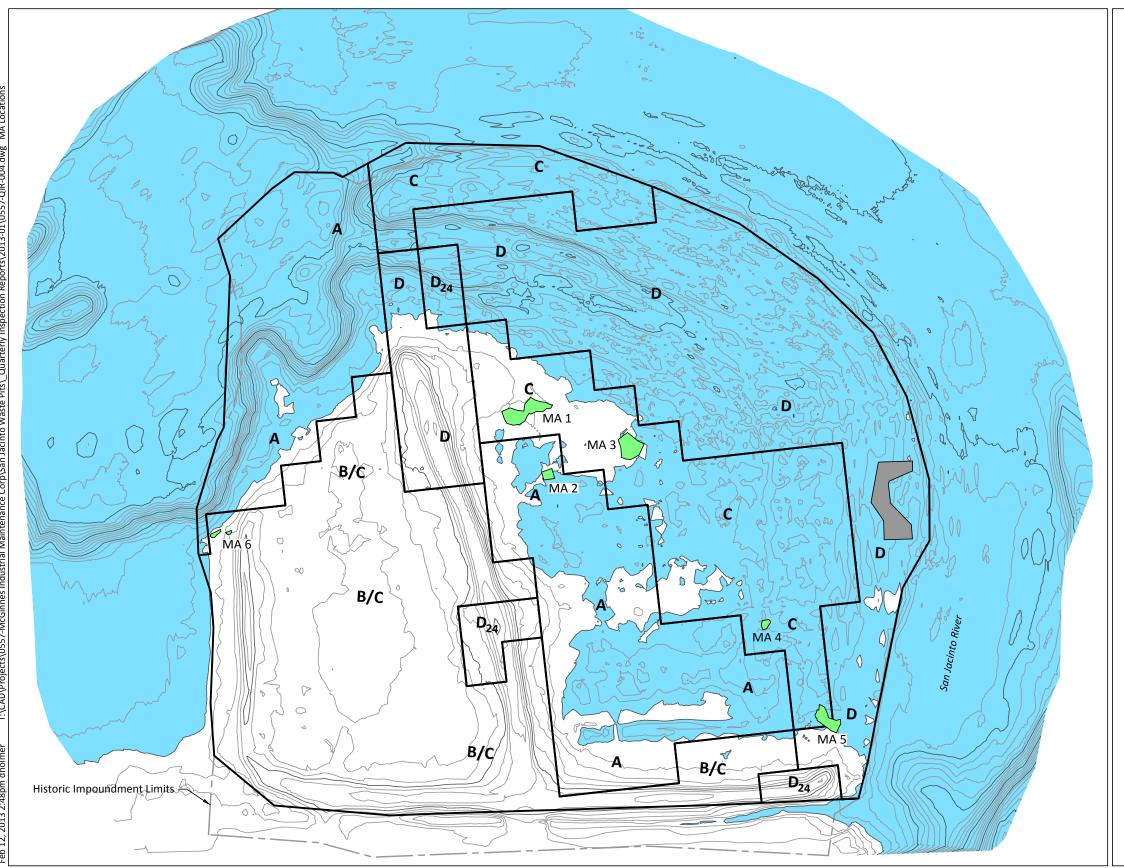
REFERENCES

- Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River
 Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency
 (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and
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USEPA, 2010. Administrative Settlement Agreement and Order on Consent for Removal Action. U.S. Environmental Protection Agency Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company and McGinnes Industrial Management Corporation, Respondents.

FIGURES





LEGEND:



Existing Contour (1 Foot Interval) Armored Cap Type and Boundary Historic Impoundment Limits



Visual Survey Only; Not Accessible Jan. 2013 Maintenance Area

SOURCE: Drawing prepared from surveys provided by Hydrographic Consultants dated January 2013. HORIZONTAL DATUM: Texas State Plane South Central, NAD83, U.S. Feet. VERTICAL DATUM: NAVD 88.

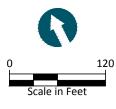


Figure 1 Maintenance Area Locations Maintenance Completion Report San Jacinto River Waste Pits Superfund Site

ATTACHMENT 1 RESPONDENTS' NOTIFICATION OF DEFICIENCY TO USEPA



614 Magnolia Avenue Ocean Springs, Mississippi 39564 Phone 228.818.9626 Fax 228.818.9631

January 15, 2013

Valmichael Leos U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-RA) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2750

Re: San Jacinto River Waste Pits Time Critical Removal Action Cap Inspection Notification Project Number: 090557-01

Dear Valmichael:

In accordance with Section 3.1 of the Operations, Monitoring, and Maintenance (OMM) Plan for the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (Site), Anchor QEA conducted an inspection of the TCRA that commenced on Friday, January 11, 2013. This letter provides notice that, as part of the inspection, two small areas in the Eastern Cell were observed during the inspection with limited, or no armor cover. One area is parallel to the southeastern berm and the other is east of the central berm towards the northern end. In both areas, geotextile is visible and intact.

Pursuant to Section 3 of the OMM Plan, Anchor QEA is initiating supplemental field inspections to obtain additional survey data. Following an evaluation of this information, and in accordance with the OMM Plan, a maintenance plan will be submitted to the USEPA for approval. Our preliminary review indicates that these areas can be readily addressed through the placement of additional stone capping material. The schedule for the plan and subsequent maintenance will be discussed with you later this week. Please feel free to contact me to discuss in further detail. Sincerely,

David C. Kind

David Keith Anchor QEA, LLC

Cc: Barbara Nann, U.S. Environmental Protection Agency
 Philip Slowiak, International Paper Company
 David Moreira, McGinnes Industrial Maintenance Corporation
 Andrew Shafer, McGinnes Industrial Maintenance Corporation



614 Magnolia Avenue Ocean Springs, Mississippi 39564 Phone 228.818.9626 Fax 228.818.9631

January 18, 2013

Valmichael Leos U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-RA) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2750

Re: San Jacinto River Waste Pits Time Critical Removal Action Cap Inspection Notification Project Number: 090557-01

Dear Valmichael:

In accordance with Section 3.1 of the Operations, Monitoring, and Maintenance (OMM) Plan for the San Jacinto River Waste Pits Time Critical Removal Action (TCRA), this letter provides notification that on January 17, 2013, during our surveying and probing of the armor cap being performed to address the two small areas in the eastern cell that we notified you of on January 15, 2013, we observed additional areas that will require maintenance.

Wind and tides conditions over the last two days have been very favorable for a detailed visual inspection and surveying of the surface of the cap over large parts of the eastern cell that are normally submerged. That detailed visual inspection and surveying resulted in the discovery of additional areas that will require maintenance, and we are continuing to survey and probe those areas today. One area in particular, constructed with Armor Rock A, and measuring approximately two feet by two feet, exhibits a slight depression. It appears that the geotextile underlayment in this area may no longer be present (visual observation is hindered by the presence of standing water), but manual probing confirms that a 12 to 18 inch layer of Armor Rock A cap material and sediment is present within the depression. We are continuing to evaluate that particular location.

Pursuant to Section 3 of the OMM Plan, Anchor QEA is continuing with supplemental field inspections to obtain additional survey data of all locations today. Following an evaluation of this information, and in accordance with the OMM Plan, a maintenance plan will be submitted to the USEPA for approval. Our preliminary review indicates that these areas can be readily addressed through the placement of additional stone capping material and if necessary, a geotextile over-placement with armor rock at the one location. The schedule for the plan and subsequent maintenance will be discussed with you early next week. Please feel free to contact me to discuss in further detail.

Sincerely,

David C. Kind

David Keith Anchor QEA, LLC

Cc: Barbara Nann, U.S. Environmental Protection Agency Philip Slowiak, International Paper Company David Moreira, McGinnes Industrial Maintenance Corporation Andrew Shafer, McGinnes Industrial Maintenance Corporation

ATTACHMENT 2 RESPONDENTS' TCRA CAP MAINTENANCE PLAN



614 Magnolia Avenue Ocean Springs, Mississippi 39564 Phone 228.818.9626 Fax 228.818.9631

January 23, 2013

Valmichael Leos EPA Project Coordinator (6SF-RA) United States Environmental Protection Agency Region 6 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202

 Re: San Jacinto River Waste Pits Superfund Site Time Critical Removal Action TCRA Cap Maintenance Plan CERCLA Docket No. 06-12-10
 Project Number: 090557-01

Dear Mr. Leos:

You were notified on January 15, 2013 and January 17, 2013 that inspections conducted pursuant to Section 3 the Operations, Monitoring, and Maintenance (OMM) Plan for the San Jacinto River Waste Pits Time Critical Removal Action (TCRA) had identified areas in the Eastern Cell in which maintenance was required. On January 18, 2013, the specific areas were further verified and delineated. This letter is to provide you with a proposed plan for conducting maintenance of the cap, in accordance with the requirements of Section 3 of the OMM Plan.

Figure 1 shows a map of the TCRA Site with the areas that require maintenance (hereinafter referred to as "Maintenance Areas"). Based on the inspection and survey data resulting from the recent quarterly inspection of the TCRA cap, there are five Maintenance Areas in the Eastern Cell with less than the required armor cover thickness. In one of those areas, Maintenance Area 2, there is a need for placement of a geotextile fabric in addition to armor stone.

CAP REPAIR PLAN

This section describes data collection conducted in connection with the cap maintenance and the plans for performing the maintenance, including the following:

- Data collection for cap maintenance planning
- Cap maintenance procedures
- QA/QC procedures during cap maintenance
- Continuing OMM Plan following cap maintenance

Data Collection

Additional survey and cap thickness probing data were collected on January 17 and 18, 2013 around the Maintenance Areas in the Eastern Cell. The survey and probing data were used to delineate the horizontal extent of the maintenance activities and to estimate the required armor stone volume needed to augment the armor layer.

Maintenance Procedures

The affected areas will be addressed by placing additional material in the Maintenance Areas in the Eastern Cell identified in Figure 1. The final cap surface will have at least 12 or 18 inches of armor rock (depending on rock type) covering these areas as required per the Removal Action Work Plan (RAWP).

For Maintenance Areas 1, 3, and 5, it is anticipated that the armor material will be placed from land access points using a small loader (Bobcat, Skid Steer or equivalent) equipment as appropriate, within the horizontal limits delineated for the maintenance activities. The contractor will use placement methods previously approved by USEPA in the RAWP to prevent damage to the geotextile. Depending on tides, the materials may be hand placed.

In Maintenance Area 2, which measures approximately 2 foot by 2 foot, Armor Cap C stone will be placed to achieve a uniform surface at the elevation of the surrounding geotextile. A geotextile fabric which meets the specifications in the RAWP for TCRA cap construction will then be installed over the C stone with a minimum 3 foot overlap on the adjacent geotextile. Armor rock will then be installed over the entire area in the manner similar to that described above for Maintenance Areas 1, 3, and 5.

For Maintenance Area 4, depending on water levels at the time of repair, the armor stone may be placed from water access points using marine-based equipment including, but not limited to, material transport barges; barge-mounted long-reach excavators, and support boats. Water-based rock placement activities may require an off-site load/dock facility and marine transport to deliver the armor cap rock to the TCRA Site. If water levels are low, the armor rock may be offloaded close to Maintenance Area 4 and then land placed, as stated above, into the area requiring maintenance.

The material used for the Maintenance Areas will be sourced from the Armor Cap C and D stockpile that is located approximately 15 miles from the TCRA Site. This material either meets or exceeds the approved design materials for the Maintenance Areas and was purchased and stockpiled expressly for maintenance purposes. As noted in the OMM Plan, the material has previously been tested and approved for gradation and chemistry.

As shown in the typical maintenance detail (Figure 2), Armor Rock C will be placed in Maintenance Areas 1, 2, 3, and 4 to assure the minimum 12 inch design criteria is achieved. In Maintenance Area 5, Armor Rock D will be placed to assure the minimum 18 inch design criteria is achieved as shown in Figure 2.

QA/QC and Reporting

Cap maintenance activities will be observed and documented using the QA/QC procedures provided in the OMM Plan and consistent with procedures used during TCRA construction. Specifically, the following QA/QC procedures will be taken to assure that the cap maintenance activities are in accordance with this Plan:

- 1. The Maintenance Areas will be clearly laid out with visual markings of the horizontal extent of the work area, using data collected during the surveys described above. The horizontal markings will include grade stakes, rebar, marking paint or similar methods that clearly identify the Maintenance Areas.
- 2. The quantity of cap material imported from the off-Site stockpile will be recorded. This quantity will be tabulated for each Maintenance Area in a completion summary so that the total of cap material delivery can be quantified. Quantity will be measured in cubic yards, as computed from the capacity of each truck and the estimated percentage full for each load.

- 3. After each day of work is completed, the surface area (square footage) of cap maintenance will be measured by survey. This area will be compared to the volume imported to confirm that enough material was placed to equal or exceed the minimum required cap thickness.
- 4. Photographs will be taken daily to document the progress of the work, if at low tide.
- 5. A daily report will be prepared summarizing the day's work activity. The format of the report and details recorded will be consistent with the daily reports that were generated during TCRA construction.
- 6. Following completion of the maintenance activities, a survey of the top of cap surface will be performed in accordance with the OMM Plan. This survey will be compared to the survey information described above to document that the required thickness of the cap has been placed in the Maintenance Areas.

Upon completion of the maintenance activities, a maintenance report will be prepared documenting the work as complete, and submitted to USEPA for review and approval.

We request USEPA's review and approval of this plan as soon as possible. Mobilization of the repair response will begin within one business day of USEPA approval of this proposed maintenance plan. We are coordinating with the TCRA contractor, USA Environment, and will keep USEPA informed of the exact start date of the maintenance work. Actual placement will be driven by tides and timing related to mobilizing equipment to the TCRA Site. Please contact us if you have any questions.

Sincerely,

flur P: For

John P. Laplante for David C. Keith Project Coordinator

cc: Barbara Nann, U.S. Environmental Protection Agency Philip Slowiak – International Paper Company David Moreira and March Smith – McGinnes Industrial Maintenance Corporation

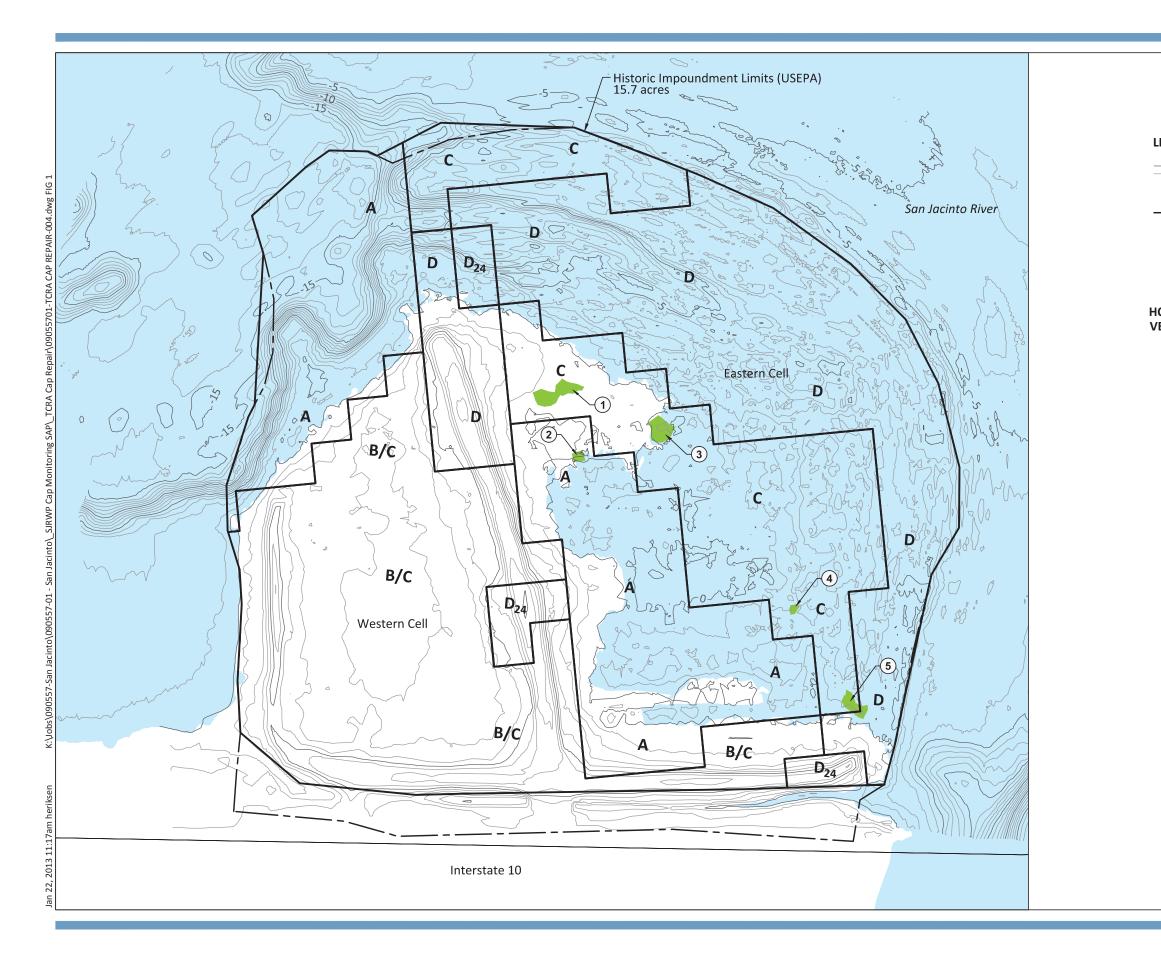
FIGURES

Figure 1 – TCRA Site Map

Figure 2 – Typical TCRA Cap Maintenance Detail

REFERENCES

- Anchor QEA, 2011. Final Removal Action Work Plan, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.
- Anchor QEA, 2012. Revised Draft Final Removal Action Completion Report, San Jacinto River Waste Pits Superfund Site. Prepared McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency Region 6. March 2012.





LEGEND:



Post-Construction Contour, 10/2012 (1-foot interval)

Historic Impoundment Limit (USEPA)

Maintenance Area

HORIZONTAL DATUM: Texas South Central, NAD83. US Survey Feet. VERTICAL DATUM: NAVD88.

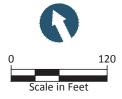
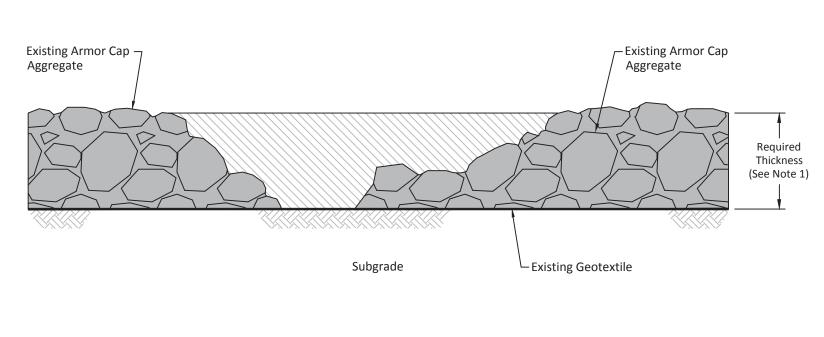


Figure 1 TCRA Site Map TCRA Cap Maintenance San Jacinto River Waste Pits Superfund Site



LEGEND:



Additional Overlay of Armor Cap Aggregate

NOTES:

- 1. Minimum thickness of cap must be at least 12 inches in Armor Cap A and Armor Cap C locations, and 18 inches in Armor Cap D locations.
- 2. Contractor shall use placement methods that do not damage existing geotextile. Any damage caused by contractor shall be repaired to the owner's satisfaction at no additional cost.
- 3. Contractor shall use low ground pressure construction equipment and shall minimize maneuvering on the cap surface. Contractor shall repair any visible surface disturbance that was caused by the contractor's operations.
- 4. Contractor staff operating on site shall be 40-hour HAZWOPER trained.



Figure 2 Typical TCRA Cap Maintenance Detail TCRA Cap Maintenance San Jacinto River Waste Pits Superfund Site

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ATTACHMENT 3 USEPA TCRA CAP MAINTENANCE PLAN APPROVAL

Wendell Mears

From:	Leos.Valmichael@epamail.epa.gov
Sent:	Thursday, January 24, 2013 5:29 PM
То:	John Laplante
Cc:	Al Axe; Nann.Barbara@epamail.epa.gov; David Keith; David Moreira; Andrew Shafer;
	Francis Chin; Miller.Garyg@epamail.epa.gov; John Cermak; Jennifer Sampson; John
	Verduin; Ken Haldin; Kerri Scott; Linda Henry; Luda Voskov; Phil Slowiak; Randy Brown;
	Rick Prior; Inglin, Sonja A.; Steve Ginski; Teri Freitas; Wendell Mears
Subject:	Re: TCRA Maintenance Plan

I approve with the plan. Please proceed with the work.

Valmichael Leos On Scene Coordinator (OSC) Emergency Readiness Section US Environmental Protection Agency Region 6 1445 Ross Ave. (6SF-PE) Dallas, Texas 75202 Office: 214-665-2283 Fax: 214-665-2278

To report an Environmental Violation, visit EPA's website at http://www.epa.gov/compliance/complaints/index.html

From: John Laplante <<u>ilaplante@anchorgea.com</u>>

To: Valmichael Leos/R6/USEPA/US@EPA

Cc: Al Axe <<u>aaxe@winstead.com</u>>, Andrew Shafer <<u>dshafer@wm.com</u>>, Barbara Nann/R6/USEPA/US@EPA, David Keith <<u>dkeith@anchorqea.com</u>>, David Moreira <<u>dmoreira@wm.com</u>>, Francis Chin <<u>FChin@wm.com</u>>, Garyg Miller/R6/USEPA/US@EPA, "Inglin, Sonja A." <<u>singlin@bakerlaw.com</u>>, Jennifer Sampson <<u>sampson@integral-corp.com</u>>, John Cermak <<u>Jcermak@bakerlaw.com</u>>, John Verduin <<u>jverduin@anchorqea.com</u>>, Ken Haldin <<u>khaldin@wm.com</u>>, Kerri Scott <<u>kscott@anchorqea.com</u>>, Linda Henry@poha.com>, Luda Voskov <<u>lvoskov@tceq.state.tx.us</u>>, Phil Slowiak <<u>philip.slowiak@ipaper.com</u>>, Randy Brown <<u>rbrown@anchorqea.com</u>>, Rick Prior <<u>Rick.Prior1@ipaper.com</u>>, Steve Ginski <<u>Steve.Ginski@ipaper.com</u>>, "Teri Freitas" <<u>treats@anchorqea.com</u>>, Wendell Mears <<u>wmears@anchorqea.com</u>>
Date: 01/23/2013 06:04 PM

Subject: TCRA Maintenance Plan

Valmichael -

Attached please find a copy of the TCRA Maintenance Plan in accordance with the San Jacinto River Waste Pits Time Critical Removal Action (SJRWP TCRA) Operations, Monitoring and Maintenance (OMM) Plan. Five hard copies are being transmitted via FedEx.

Please let us know if you have any questions.

Regards,

John P. Laplante, PE ANCHOR QEA, LLC

jlaplante@anchorgea.com 720 Olive Way, Suite 1900 Seattle, Washington 98101 Main 206.287.9130 Direct 206.903.3323

Fax 206.287.9131

ANCHOR QEA,LLC

www.anchorgea.com

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[attachment "TCRA Cap Maintenance Plan 01232012.doc.pdf" deleted by Valmichael Leos/R6/USEPA/US]

ATTACHMENT 4 MOBILIZATION, MAINTENANCE, AND DEMOBILIZATION DAILY REPORTS



PAGE 1 OF 2

PROJECT	San Jacinto F	River Waste Pits TCRA Mainten	ance		CONTRA	CT NO.			
CONTRACTO	R USA Env	vironment, LP		SUPERINTE	NDENT	Ron Grif	fith		
DAY OF WEE	K& DATE:	Friday, January 25, 2012				REPORT N	0.	001	
WEATHER	Sunny with s	light breeze from the southwe	st	TEMPERA	TURE	L:58	H:74	degrees F	
NUMBER/CL	ASS OF CONTI	RACTOR'S PERSONNEL:	MAJOR EC		ON JOB (Si	ze/capacit	ty an	d hours):	
2 – USA Envi	ronment Supe	rintendent and Laborer							
TIDE INFORM	IATION:		HEALTH A	ND SAFETY	INFORMA	TION:			
Time: n/a	Height:	n/a	No incider	nts or near n	nisses on t	his date.			
		IT OF DAY'S WORK: s and discusses approved main	tenance pla	an and USA I	Environme	nt LP's (US	5A) p	roposal.	
0830 – Ancho	or QEA discuss	es proposal with USA's Project	Director.						
0900 - W. Mears communicates with local TxDOT representatives, updating them on maintenance activities									
1115 – USA is	notified to p	roceed with the approved mair	ntenance pl	an					
1300 to 1600	–USA superin	tendent Ron Griffith and labor	er accompl	ished the fol	llowing tas	ks:			
 Mark Confi Orde Orde 	rmed location red skid steer red geotextile	ty and access storage areas on site for rock is of Maintenace Area (MA) 1, 2 and rock transfer trucks for Me fabric for Monday delivery le locations and volumes for ty	2 and 5 with onday, Janu	ary 28, 2013		work item	S		
OrdeUpdaMark	d Notice to Pr red and confir ted Health an ed maintenar	oceed to Maintenance Contrac med materials, manpower and d Safety Plan			_P				
Persons On-s	ite on this Da	te:							
USA Environr	nent LP super	intendent and laborer							



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 2
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 2

Material	Units	Delivered 2/01 (units)	Delivery Verification Method	on	Preceding Delivered Total	Total Delivered for Project
Туре С	ton	0	Truck bed measur	e	0	0
Type D	Ton	0	Truck bed measure		0	0
300 – Discuss p	•	th USA Environment				
	nobilization	progress with USA				
500 – Discuss n		EN: (attached belov	v) <u>FORCE A</u>		NT WORK/ CHAN	GES ENCOUNTERED:
500 – Discuss n			v) <u>FORCE A</u> None	<u>.ccou</u>	NT WORK/ CHAN	GES ENCOUNTERED:



PAGE 1 OF 3

PROJECT	San Jacinto	River Waste Pits TCRA Mainten	ance		CONTRAC	T NO.		
CONTRACTO	R USA Er	ivironment, LP		SUPERINTE	NDENT	Ron Grit	ffith	
DAY OF WEEI	K & DATE:	Monday, January 28, 2013			F	REPORT N	ю.	002
WEATHER	Sunny with	slight breeze from the south	-	TEMPERA	TURE	L:66	H:78	3 degrees F
NUMBER/CL	ASS OF CONT	RACTOR'S PERSONNEL:	MAJOR EQ		ON JOB (Siz	e/capacit	ty an	d hours):
2 – USA Envi	ronment & Si	ubcontractors		l steer (mair			-	
				Loader (agg	-	-		
TIDE INFORM				dump trucks ND SAFETY I			e	
		ansitioning to low tide at 1820		ts or near m				
hrs.	-morning, tre		NO INCIDEN		113363 011 11	iis date.		
CHRONOLOG	ICAL ACCOU	NT OF DAY'S WORK:	1					
	Pre-construc bank.	tion meeting, review Health & S	Safety Plan a	and tailgate	meeting ne	ear the w	est g	ate, north
	Environment Skid st Hydro buoys Temp	-site at TxDOT right-of-way adja c, then observed: teer delivery graphic survey team working in orary stockpile area in southeas gate delivery, type C	eastern cell	l area marki	ng Mainter	·		
1000 – 1030	Depart Site t	o inspect aggregate stockpile ar	rea access ga	ates.				
	First load of a flags.	aggregate arrives on-site. Seco	nd skid steei	r delivered.	USA marks	s MA 1 wi	ith ta	aller marking
1230 – 1330 I	Depart Site fo	or lunch.						
9	Site. Tide lev	g aggregate on MA 1 using two 9 els drop below MA 1 and MA 5 ay morning. Geotextile delivere	elevations.					
 Mobi 	lized skid ste lized front-er	this Date: ers and aggregate to the Site. Ind loader to aggregate stockpile kimately 75% of MA 1.	e area.					
<u>Persons On-S</u> Wendell Mea Phil Slowiak (USA Environn	rs (Anchor Q International	EA)						



Material	Units	Delivered (units)	-	Verificati ethod	on	Preceding Delivered Total	Total Delivered for Project
Туре С	Ton	75	Truck bed measure		0	75	
Type D	Ton	0	Truck bed measure		re	0	0
ONE LOG: drew Shafer –	discussed fo	ence repairs on so	outh line, east	bank.			
E PHOTOS/VI	DEOS TAKEI	<u>N:</u> (attached belo	ow)	FORCE A	ACCOU	<u>NT WORK/ CHAN</u>	GES ENCOUNTERED:
		<u>V:</u> (attached belo ded underneath p	-	FORCE A		<u>NT WORK/ CHAN</u>	GES ENCOUNTERED:



Photograph 1 – Skid Steer carrying Rock Type C to MA 1.





Photograph 2 – Skid Steer returning to temporary stockpile. Pin Flag marking MA 1.



Photograph 3 – Standing on MA 2, looking toward MA 1.



PAGE 1 OF 2

PROJECT	San Jacinto	River Waste Pits TCRA Mainten	ance		CONTRA	CT NO.				
CONTRACTO	R USA E	nvironment, LP		SUPERINTE	NDENT	Ron Grit	ffith			
DAY OF WEE	K & DATE:	Tuesday, January 29, 2013					ю.	003		
WEATHER	Overcast, d	rizzling rain, with winds from th	e south	TEMPERA	TURE	L:66	H:78 de	egrees F		
NUMBER/CL	ASS OF CONT	RACTOR'S PERSONNEL:	MAJOR EC		ON JOB (Si	ize/capaci	ty and l	hours):		
		ubcontractors	2 each Skid Steer (main Site) Front-end Loader (aggregate stockpile area)							
1 – Hydrogra	phic Consulta	ants			-	•	-			
TIDE INFORM				dump truck: ND SAFETY			.e			
		ansitioning to moderate tide		nts or near n						
at 1820 hrs.	, morning, er					ins dute.				
CHRONOLOG	GICAL ACCOU	NT OF DAY'S WORK:	1							
 0800 – 0900 Pre-construction meeting, review Health & Safety Plan and tailgate meeting near the west gate, north bank. Surveyor on Site. 0900 – 1100 W. Mears on-site at TxDOT right-of-way adjacent to Site for safety and daily work plan briefing by USA Environment, then observed: Improving ramp and access using on-site access ramp materials Final loads of C rock delivered; D rock delivered Preparing to work low tide after 1300 hrs 										
	through fend USA installin Tide levels re	te for lunch and inspected the for te was discovered since the pre og aggregate on MA 1 using two pose due to high winds from the etter tides. Work was stopped	vious day. Skid Steers south. Insta	. Completed alled pin flag	d M1. Ren s on MA 2	nainder of 2 and MA 5	rock de	elivered.		
Dem Com Plann Persons On-s Wendell Mea Phil Slowiak (Andrew Shaf	Progress on pleted aggreg obilized From pleted MA 1, ned a longer Site on this D ars (Anchor C (Internationa er (MIMC) ald (Hydrogreg	this Date: gate move to temporary stockp t-end Loader from aggregate st started MA 3 and MA 5. work day for Wednesday to tak ate: (EA)	ile areas in N ockpile area	Western Cell	l.	-	⁻ tides.			



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Material Deliver	y Summary	as of this Date:				
Material	Units	Delivered (units)	Delivery Verificat Method	ion	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	40	Truck bed measu	ire	75	115
Type D	Ton	46	Truck bed measure		0	46
TESTS PERFORM	IED: No	ne				<u> </u>
<u>PHONE LOG:</u> 1300 – Contacte	d fence com	pany to repair cu	ts and install additiona	Il fabric	and wire at two l	ocations.
SITE PHOTOS/VI	DEOS TAKEI	<u>N:</u> (attached belo	ow) <u>FORCE</u>	ACCOU	NT WORK/ CHAN	GES ENCOUNTERED:
<u>SITE PHOTOS/VI</u> No photos due t		_ ·	w) <u>FORCE</u> None	<u>ACCOU</u>	NT WORK/ CHAN	GES ENCOUNTERED:



PAGE 1 OF 4

PROJECT	San	lacinto I	River Waste Pits TCRA Mainter	nance		CONTRA				
CONTRACTO				lance	SUPERINTE		Ron Grit	fith		
			vironment, LP		JUPERINI					
DAY OF WEE	K & D	ATE:	Wednesday, January 30, 201	13			REPORT N	I O .	004	
WEATHER	Ove	rcast, dr	zzling rain, with winds from th	ne south	TEMPERA	TURE	L:53	H:60 (degrees F	
			RACTOR'S PERSONNEL:	-	QUIPMENT	-	ize/capaci	ty and	hours):	
3 – USA Envi					d Steer (mai	-				
1 – Hydrograj	phic C	Consulta	nts	1 long rea	ch excavato	r				
TIDE INFORM	IATIO	<u>N:</u>		HEALTH AND SAFETY INFORMATION:						
-		-	nsitioning to low tide at	No incider	nts or near n	nisses on t	this date.			
0900, then ve										
CHRONOLOG	ICAL	ACCOUR	IT OF DAY'S WORK:							
0630 - 0730	Prepa	atory me	eting with crew and surveyor	, tailgate me	eting near t	he west g	ate, north l	bank.	Winds out of	
	-	-	25 knots, able to work MA 2 a	-	-	-				
 0730 – 1000 W. Mears on-site working with surveyor to complete flagging MA 2, 3 and 5, then observed and assisted USA Environment: Transporting rock to MA 2 and 3. USA orders long reach excavator and mats to complete MA 4 during low water event. 1000 – 1045 Departed Site to meet National Fence Co. (NFC) representative to arrange for fence repairs at two 										
	locat	ions ider nded to នូ	round level, with additional p	EPA during ir	spections.	Fabric and	l/or barbed	d wire	will be	
d	elive	red and	ite to work with maintenance the team works on MA 4 and 9 han 25 knots, pushing enough	5 simultaneo	ously. During	g the after	rnoon, sust	ained	wind speeds	
 Comp Instal Remo Surve 	ed to pleted lled a pved a ey cor	MA 4 w d locatio ggregate all equip npleted	nis Date: ith long reach excavator on m ns MA 2, 3, 4, and 5. e along overlap joint near NW ment from interior of Site, sta for all MA's. ation activities for Thursday m	corner of we cked mats fo		• •	os).			
Persons On-S Wendell Mea Scott McDona USA Environn	irs (Ai ald (H	nchor QI Iydrogra								



Material	Units	Delivered (units)	Delivery Me	Verificati ethod	on	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	0	Truck bed measure		75	115	
Type D	Ton	0	Truck bed measure		Truck bed measure 46		46
.000 – National lignment, west	•	any representativ	e called wher	he arrive	ed at th	ne maintenance lo	cations along the sout
	DEOS TAKEI	N: (attached belo	w)	FORCE A		NT WORK/ CHAN	GES ENCOUNTERED:
		<u>N:</u> (attached belo ons.	ow)	FORCE A		<u>NT WORK/ CHAN</u>	GES ENCOUNTERED:



Photograph 1 - Completed MA 2 in foreground, surveyor marking MA 3 in background.





Photograph 2 – Skid Steers transporting rock along central berm, then across MA 2 to MA 3.



Photograph 3 – Skid Steer transporting rock to MA 5.



PAGE 4 OF 4



Photograph 4 – Surveyor checking MA 4 surface before demobilizing long reach excavator.



Photograph 5 – Surveyor checking lap joint maintenance, NW corner western flats. Photograph from atop western berm.



PAGE 1 OF 6

DDOILCT	Con loo	into Di								
PROJECT			ver Waste Pits TCRA Mainten	ance		CONTRA				
CONTRACTO	R US	SA Envi	ironment, LP		SUPERINTEI	NDENT	Ron Griffit	ו ו		
DAY OF WEE	K & DATE	E:	Thursday, January 31, 2013		1		REPORT NO.	005		
WEATHER	Sunny v	with sli	ight winds from the south		TEMPERAT	URE	L:37 H:6	50 degrees F		
NUMBER/CL	ASS OF C	ONTR	ACTOR'S PERSONNEL:	MAJOR EQUIPMENT ON JOB (Size/capacity and hours):						
2 – USA Envi	ronment	t & Sub	ocontractors							
TIDE INFORM	IATION:			HEALTH A	ND SAFETY II	NFORMA	TION:			
Low tide early due to south	•	ng, trar	nsitioning to higher tides	No incidents or near misses on this date.						
CHRONOLOGICAL ACCOUNT OF DAY'S WORK:										
 0800 – 0830 Tailgate meeting near the west gate to discuss load out safety. 0900 – 1130 W. Mears on-site to complete punch list, clear vines and shrubs near signage and observe demobilization of the following equipment: USA cleared vines and woody stem vegetation from signage atop central berm. Mats loaded and demobilized. Linkbelt long reach excavator and two Skid Steers loaded near west gate and demobilized. West gate secured. 1130 Called National Fence Co. (NFC) representative for repair date. Was informed that repairs would be 										
	ompleteo erificatio		r before Tuesday, February 5,	2013, and p	ohotographs	will be pr	ovided to An	chor QEA for		
eastbound br the bridge an	idge abu d it appe	utment ears th	at TxDOT on January 29, 2013 of I-10, east bank. Based on at they have been accessing t guardrail on the north side (v	a walk of th he site via th	e area, there he small oper	have bee	en recent fire	s build under		
DemoConfi	ed vines obilized a rmed fer red the si	and sh all equ nce rep site and	nrub growth around two signs ipment. pair date. d departed.	atop the ce	entral berm.					
Wendell Mea										

Wendell Mears (Anchor QEA) USA Environment Crew



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Material	Units	Delivered (units)	-	Verificati ethod	on	Preceding Delivered Total	Total Delivered for Project
Туре С	Ton	0	Truck bed measure		0	115	
Type D	Ton	0	Truck bed measu		re	0	46
<mark>IONE LOG:</mark> L30 – National	Fence comp	oany representativ	ve called to co	nfirm rep	air date	2.	
	DEOS TAKE	<u>N:</u> (attached belo	ow)	FORCE A		NT WORK/ CHAN	GES ENCOUNTERED:
TE PHOTOS/V							
<u>TE PHOTOS/VI</u> ne photograph	is with capt	ions.		None			



Photograph 1 – Demobilizing mats.



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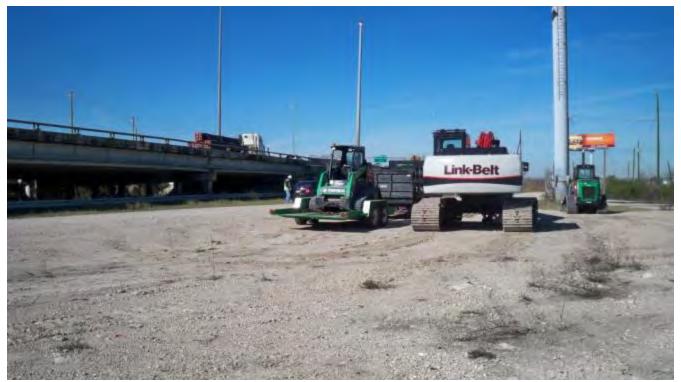
Photograph 2 – Vines removed from signage on central berm.



Photograph 3 – Woody stem vegetation cleared from signage on central berm.



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Photograph 4 – Skid Steer loaded for demobilization near west gate.



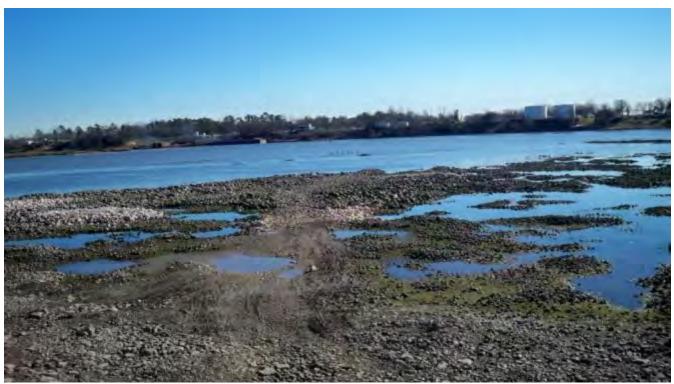
Photograph 5 – Linkbelt excavator demobilized from site.



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Photograph 6 – MA 5 photo from atop the southern berm.



Photograph 7 – MA 1 and 2 and showing access lane to MA 2 and 3. MA 3 in the distance.



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Photograph 8 – From atop the central berm, looking southeast. Access route to MA 4 in foreground.



Photograph 9 – From atop the western berm, looking north and east. Small maintenance area near water's edge.



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PROJECT	San	Jacinto R	CONTRA	CT NO.					
CONTRACTO	R	Nationa	l Fence Company		SUPERINTE	NDENT	John Bu	rns	
DAY OF WEE	WEEK & DATE: February 5 and 6, 2013							10.	006
WEATHER	Overcast with intermittent rain					TEMPERATURE L:56 H:67 degree			7 degrees F
NUMBER/CL	OF CONTR	ACTOR'S PERSONNEL:	MAJOR EQUIPMENT ON JOB (Size/capacity and hours):						
3 – National	Fence	е		Fence Rep	oair Truck ald	ong perime	eter		
TIDE INFORM	1ATIC	<u>DN:</u>		HEALTH A	ND SAFETY	INFORMA	TION:		
N/A				No incide	nts or near n	nisses on t	his date.		
-	ΙΑΤΙΟ	<u>DN:</u>		-					

CHRONOLOGICAL ACCOUNT OF DAY'S WORK: February 5, 2013

1400 - 1630 – After safety and scope briefing, crew cleared repair areas and drove short pipe sections along 3 panels, south fence alignment, west bank of the San Jacinto River. Replaced cut fence panel section, started barb wire installation. Measure damaged gate center post for replacement.

February 6, 2013

1000 – 1330 – Completed barb wire installation. Installed new gate center post, east bank access. Took photographs repairs and departed Site.

Summary of Progress on this Date:

- Repaired cut fence fabric
- Installed additional mid panel posts and barb wire
- Replaced damaged gate center post
- All maintenance items complete

Persons On-Site on this Date:

National Fence Crew along perimeter.

Material Delivery Summary as of this Date:

Material U		Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project	
Fencing	LS	1	Photographs	0	1	
ESTS PERFORMED:		lone				



PHONE LOG:

1230 – National Fence company representative notified Wendell Mears of completed repairs, followed by emailed photographs.

SITE PHOTOS/VIDEOS TAKEN	FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:						
Five photographs with captions.			None				
REPRESENTATIVE	Wendell Mears	I	HRS	0	DATE	02/06/2013	



Photograph 1 – Repaired fence fabric, south alignment, west bank of the San Jacinto River I-10 crossing



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Photograph 2 – Added posts and barb wire closures, south fence alignment, west bank.



Photograph 3 – Added barb wire and fence supports to prevent access, south fence line, west bank.



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Photograph 4 – Added lower supports on adjacent panels to secure fence fabric and barb wire.



Photograph 5 – New gate center post installation, east bank. All fence maintenance actions complete.