



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS TX 75202-2733

MAY 30 2017

Ms. Beth Seaton, Remediation Director  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Request for State Concurrence – New Proposed Sites for the Superfund National Priorities List

Dear Ms. Seaton,

The United States Environmental Protection Agency (EPA) is considering proposing the Lane Plating Works site in Dallas, Texas and the River City Metal Finishing site in San Antonio, Texas, for inclusion to the Superfund National Priorities List (NPL), pursuant to its authority under Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9605. The NPL contains a list of priority sites with releases of hazardous substances, pollutants or contaminants that require evaluation for possible remediation. It is the EPA's policy to determine the State's position on sites that the Agency is considering placing on the NPL. With this letter, the EPA is seeking the concurrence from the State of Texas on adding Lane Plating Works and River City Metal Finishing sites to the NPL.

River City Metal Finishing is a former metal plating shop that operated from 1994 until approximately 2002. The site includes the release of hexavalent chromium from the former facility to the shallow ground water unit and the potential migration of that release to the Edwards Aquifer. The Edwards Aquifer system is the sole source of water for the San Antonio area, where it provides domestic, public supply, industrial, and agricultural water. There are 20 public water supply wells located within four miles of the site. Although only the shallow water-bearing unit has shown contamination, the karst features of the Edwards Aquifer system may provide a pathway for the contamination to migrate into the aquifer. The site is scheduled to be proposed to the NPL due to the hexavalent chromium plume, use of ground water for drinking, and the presence of geologic conditions favorable for migration of contaminants. Without identification and investigation of the source of ground water contamination and remediation of the contaminated ground water plume, public and private wells may be threatened.

The Lane Plating Works site is a former electroplating facility which conducted primarily hard chromium and cadmium plating and operated for approximately 90 years. Large volumes of liquid plating wastes were stored at the site as recently as October 2016. The Texas Commission on Environmental Quality (TCEQ) performed a limited removal action in November and December 2015 to remove cyanide waste and secure chromic acid sludge. The EPA completed a

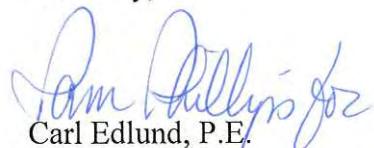
removal action of all solid and liquid wastes at the site in November 2016. The site is located near a residential area, and on-site wastes include acids, bases, flammables, oxidizers, chromium containing solids (sludge), and liquids. The contaminants of concern for the site are cyanide, chromium, cadmium, lead, mercury and other hazardous substances associated with the electroplating process. Hazardous substances from the site have been released into on-site soils, underlying ground water, surface water and sensitive environments including wetlands and endangered species. The removal actions focused on the immediate threats from on-site liquids and sludge; however, the site needs long-term remedial action to clean up the contaminated soils, ground water and impacts to surface water.

The EPA is committed to working cooperatively with the State and local community throughout the listing and subsequent Superfund cleanup process, and to ensuring that the actions are conducted in an open and transparent manner. For a fund-financed remedial action prior to initiation of the remedial action, the EPA and the State will collaborate in the development of a contract to provide the State assurances required by CERCLA, including for example, the State's statutory cost share for the remedial action and assumption of operation and maintenance responsibilities.

The EPA is requesting a written response to this letter from your Governor's office or from the TCEQ by July 7, 2017, to allow adequate time to meet the proposed rule schedule. The response letter should indicate whether the State supports, or does not support, placement of the sites on the NPL. If not, the State should describe an alternative approach to placement on the NPL that will ensure the sites and their associated releases will be addressed. The EPA will be sharing information with the community regarding the State's position, including posting the information on the internet. The EPA will also invite the TCEQ to participate in any community meetings during the listing process.

We will continue to work closely with and seek input from the State as the listing process proceeds. We appreciate your consideration of this matter. If additional information is needed or you would like to meet to discuss this matter further, please contact me at (214) 665-6701, or have your staff, call Brenda Nixon Cook, Region 6 NPL Coordinator, at (214) 665-7436.

Sincerely,



Carl Edlund, P.E.  
Director  
Superfund Division

CC: Mr. Brent Wade, TCEQ  
Mr. Monica Harris, TCEQ  
Mr. Stephen Ellis, TCEQ  
Ms. Terry Jeng, EPA-OSRTI