

ATTACHMENT 1C.4.5a

Plant Site Subgrade Fill Placement
Plant Site Assessment Areas



ARCADIS

Plant Site Subgrade Fill Placement Plant Site Assessment Areas

Introduction

Excess Category II material (primarily slag) and Category III material were stockpiled on the plant site following excavation work in other portions of the property, primarily the Parker Brothers Arroyo, East Property, and La Calavera assessment areas (AAs). These materials were used as structural fill to provide a foundation layer for the Response Action evapotranspiration (ET) soil cover. Texas Custodial Trust (TCT) previously prepared and submitted the following documents regarding this fill placement:

- Letter to Texas Commission on Environmental Quality (TCEQ) dated July 30, 2012 regarding Category II Placement Plan (letter included three attachments: two figures and Site Grading Plan – Backfill Specifications, dated July 2012, which were superseded; see letter dated 4/21/2015)
- Letter to TCEQ dated April 21, 2015 regarding Plant Site Cover Improvement Plans and Specifications/CQA Requirements Submittal, which included Site Grading Plans (20 sheets), Site Grading Plan - Backfill Specifications and CQA Requirements, April 2015-Rev. 1 - included in this attachment

The Response Action Plan (RAP) notes plant site fill placement in the following components:

- RAP Attachment 2A-2, Cell 1 & 2, figure – liner/cover detail
- RAP Attachment 2A-4 Figure 2 Plant Site Cat I Areas

Regulatory Approval

- Letter from TCEQ dated May 22, 2015 Regarding TCEQ Review and Approval of the following documents:
 - Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Covers, dated April 8, 2015
 - Plant Site Cover Improvement Plans and Specifications/CQA Requirements Submittal, dated April 21, 2015

Response Action

The TCT placed and compacted the stockpiled Category II and III materials on portions of the plant site at the North and South Pads as described in the construction quality assurance (CQA) report included in this Attachment.

The north portion of the South Pad will have additional Category II material placed on it in 2017 followed by completion of the final ET cover. Activities performed in 2017 will be documented in the 2017 Soil RACR.

Supporting Documentation Included in This Attachment

- Letter to TCEQ dated July 30, 2012 regarding Category II Placement (without attachments)
- Letter to TCEQ dated April 21, 2015 regarding Plant Site Cover Improvement Plans and Specifications/CQA Requirements Submittal which included Site Grading Plans (20 sheets), Site Grading Plan - Backfill Specifications and CQA Requirements, April 2015-Rev. 1
- Letter from TCEQ dated May 22, 2015 Regarding TCEQ Review and Approval of the following documents:
 - Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Covers, dated April 8, 2015
 - Plant Site Cover Improvement Plans and Specifications/CQA Requirements Submittal, dated April 21, 2015
- Construction Quality Assurance Report Plant Site Category II and III Site Grading and Fill Placement (Arcadis 2017)