

ATTACHMENT 1C.6.5

Texas Custodial Trust's Portion of Pile 1
Parker Brothers Arroyo Assessment Area



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Texas Custodial Trust's Portion of Pile 1 Parker Brothers Arroyo Assessment Area

Introduction

In the northwestern portion of the Lower Parker Brothers Arroyo (LPBA) Assessment Area (AA), a slag covered area adjacent to the Union Pacific Railroad (UPRR) and between the UPRR trestles is referred to as Pile 1. This area was a potential source area for constituents of concern (COCs).

A portion of Pile 1 is situated on Texas Custodial Trust (TCT) property and is referred to as TCT Pile 1. As noted on pages 5 and 12 of Worksheet 1.0 in the Response Action Plan (RAP), Response Actions include removing slag and constructing an evapotranspirative (ET) soil cover system for Category II materials located in the Pile 1 area. As noted on page 11 of Worksheet 2 in the RAP, on the western portion of TCT's Pile 1 near the Burlington Northern Santa Fe Railway (BNSF) railroad tracks, if reported concentrations of metals in confirmation samples are below the protective concentration levels for direct contact with commercial/industrial soil ($C/I^{Tot}Soil_{Comb}$), capping would not be required, and sample results would be presented in this Soil Response Action Completion Report.

TCT submitted the following document regarding TCT Pile 1:

- Letter to TCEQ dated April 6, 2016 regarding Notification of Removal and Cover Activities Planned for Texas Custodial Trust (TCT) Property Between Union Pacific Railroad (UPRR) Tracks

The response actions are described in the following sections of the RAP:

- RAP Worksheet 1.0 (page 4) – Location of TCT Pile 1
- RAP Worksheet 1.0 (page 5) – Construction of an ET soil cover system for Pile 1
- RAP Worksheet 1.0 (page 12) – Response actions (excavation and removal of slag in TCT's portion of Pile 1)
- RAP Worksheet 1.0 (page 36) – Documentation that additional slag removal was performed at TCT Pile 1
- RAP Worksheet 2.0 (page 1) – Response actions (Cap areas with Category II materials (Category II Material Storage Area, Fines Pile, Boneyard, TCT's portion of Pile 1) with a [combination] cover, preventing direct contact with COCs and surface water infiltration through COC-affected subsurface soil)
- RAP Worksheet 2.0 (page 5) – Documentation that soil removals have been performed in six areas in the PBA including TCT Pile 1
- RAP Worksheet 2.0 (page 11) – Response action (TCT's portion of Pile 1 will be capped with an ET soil cover system)
- RAP Attachment 2A-18, Letter to TCEQ regarding Notification of Removal and Cover Activities Planned for TCT Property Between UPRR Tracks, dated April 6, 2016

Regulatory Approval

The following letter from TCEQ approves the removal and cover activities proposed for the Pile 1 area:

- Letter from TCEQ dated April 13, 2016 regarding Notice to Proceed, Notification of Slag Material Removal and Cover Activities Planned for TCT Property Between the UPRR Tracks (included in this Attachment)

Response Actions

In the lower western portion of TCT Pile 1, TCT removed slag to native soil and collected confirmation samples for metals analysis. As shown in **Table 1** of this Attachment, reported concentrations of metals in remaining soil were below protective concentration levels for direct contact with commercial/industrial soils ($C/I^{Tot}Soil_{Comb}$). Consequently, per RAP Worksheet 2 this area does not require an ET soil cover.

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In the higher eastern portion of Pile 1, TCT graded the area, placed a demarcation fabric to show the top of slag, and constructed an ET soil cover, placing approximately 1 foot of clay, 1.5 feet of silty sand, and 0.5 feet of desert armor. TCT documented the cover placement activities in a **construction quality assurance (CQA) report** (included in this Attachment). Additional details regarding the ET soil cover are presented in Attachment 1C.4.5b “Plant Site Final Cover”.

The **figure** “Exhibit IH, Pile 1 – TCT Property Demarcation Exhibit IH, Sheet 1 of 1” (originally included in the April 6, 2016 letter) has been modified and included in this Attachment to show areas where TCT removed slag and graded and placed an ET soil cover.

This Response Action has been completed.

Supporting Documentation

- Letter from TCEQ dated April 13, 2016 regarding Notice to Proceed, Notification of Slag Material Removal and Cover Activities Planned for TCT Property Between the UPRR Tracks
- Table 1 – Summary of Confirmation Sample Analytical Results
- Figure – Modified version of Exhibit IH “Pile 1 – TCT Property Demarcation, Sheet 1 of 1”
- Photolog
- Construction Quality Assurance Report, ET Cover Placement, Former UPRR Slag Pile 1, Former ASARCO Smelter Site, El Paso, Texas, March 2017 (Arcadis 2017)