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January 23, 2014

Ms. Eleanor Wehner, P.G.
Texas Commission on Environmental Quality
Remediation Division
VCP-CA Section, Mail Code MC-127
Post Office Box 13087
Austin, Texas 78753

Re: Texas Custodial Trust
Former ASARCO Smelter Site, El Paso, Texas

Subject: Location of Category II/III Stockpile on East Property

Dear Ms. Wehner:

The purpose of this letter is to present the location and configuration of a stockpile on the East Property needed for storage of Category II and III material. The intent is to move existing Category II and III material remaining from former smelter operations on the East Property to the stockpile. The purpose of this soil removal is to: 1.) Remove the material from drainage pathways; and 2.) Bring the remainder of the East Property to residential standards. The stockpile will be closed in place with a proper cover system approved by the Texas Commission on Environmental Quality (TCEQ) and deed restricted as part of the site remedy unless it is decided at a later date to move it to the plant site and placed under the planned cover system there. The material will be moved to the plant site at a later date, if certain redevelopment criteria are met. The location and configuration of the proposed stockpile is shown in Figure 1. It is located to be "high and dry" outside of the current effective and regulatory floodplains and is at least 20 feet above ground water levels in the stockpile area. The capacity of the stockpile is approximately 108,000 cubic yards (cy), which provides sufficient capacity for the anticipated volume of material, plus a buffer. The Category II and III material will be placed and compacted to 90% of modified proctor density utilizing adequate compaction equipment to minimize its volume. The slopes are designed at 3:1 (horizontal to vertical) and less than 30 feet high. The top of the stockpile will be graded to drain to maintain existing drainage tributary areas for the north and south arroyos. A 1-foot thick interim soil cover will be placed over the stockpiled material. Toe ditches will be established to route surface water to the north or south arroyo. Best Management Practices (BMPs) will be installed at the toe of slope and other areas to control erosion. The existing Storm Water Pollution Prevention Plan (SWPPP) for East Property grading activities will be updated to reflect the additional BMP measures.

Category II and III material currently exists on the East Property as residue from a former slag stockpile in the south arroyo. All identified Category I material on the East Property has been removed and disposed in Cell 4. Where currently located, the remaining Category II and III

material can come in contact with precipitation or storm water that leaches metals causing impacts to groundwater. We plan to remove these Category II and III materials as well as soils from completed Category I excavation areas that are less than commercial/industrial standards to bring these areas to residential standards. Confirmation sampling procedures described in our December 7, 2012 letter will be used. Updated commercial/industrial and residential screening levels will be provided in a separate letter. Soils removed that have been shown to be below commercial/industrial standards via confirmation sampling will be placed on the outer slopes of the stockpile as a 1 foot thick interim cover. East Borrow Area clean soils may also be used as interim cover. The soil removal areas are shown in Figure 2. Estimated volumes of material to be removed are the following:

· Inside regulatory floodplain (all but areas 5b and 9b)	15,900 cy
· Outside regulatory floodplain (areas 5b and 9b)	65,900 cy
	81,800 cy

We will discuss working in the floodplain with the City of El Paso (City). We will also submit our updated SWPPP describing BMPs that will be used to develop and maintain the stockpile to the City. We don't anticipate needing a grading permit for this work as we are not adversely altering the regulatory floodplain and are currently approved to perform remediation activities in the floodplain under our existing United States Army Corps of Engineers permit.

If you have any questions regarding this submittal, please feel free contact me at 602-797-4536.

Very truly yours,

MALCOLM PIRNIE, INC.

Scott M. Brown, P.E.
Project Manager

cc: Roberto Puga (Project Navigator Ltd.)
Glenn Hoeger, Michael Berry, Bill Sabatka, Ej Suardini

Attachments

PLACEMENT VOLUME = 108,037 CY

COVER VOLUME = 11,164 CY

REGULATORY FEMA FLOODPLAIN LIMITS

100 YEAR CORRECTED EFFECTIVE WSEL 3819.2

3820
3825
3830
3835

LIMIT OF STOCKPILE

WATERSHED DIVIDE

3830
3835

0.5%

0.5%

0.5%

0.5%

3840
3835
3830
3825
3820
3815
3810

3820
3825
3830

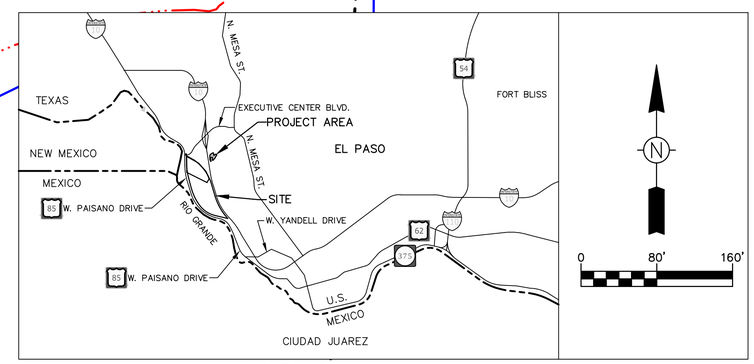
3840
3835
3830
3825
3820
3815
3810

3830
3825
3820
3815
3810

24" CULVERT

100 YEAR CORRECTED EFFECTIVE WSEL 3806.6

REGULATORY FEMA FLOODPLAIN LIMITS



VICINITY MAP
NOT TO SCALE

INTERSTATE 10

FIRM REGISTRATION F-979

MALCOLM PIRNIE

REVISIONS			
NO.	BY	DATE	REMARKS

DES I.THOMAS
DWN R.KOSCIOLEK
CKD C.ZORN

FORMER ASARCO SMELTER
EL PASO, TEXAS

FIGURE
ASARCO REMEDIATION PROJECT
EAST I-10 CATEGORY II/III STOCKPILE
1" = 80'

FIGURE 1

Date\Time: Thu, 23 Jan 2014 - 1:49pm
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Acad Version: 2018.1s (LMS Tech)
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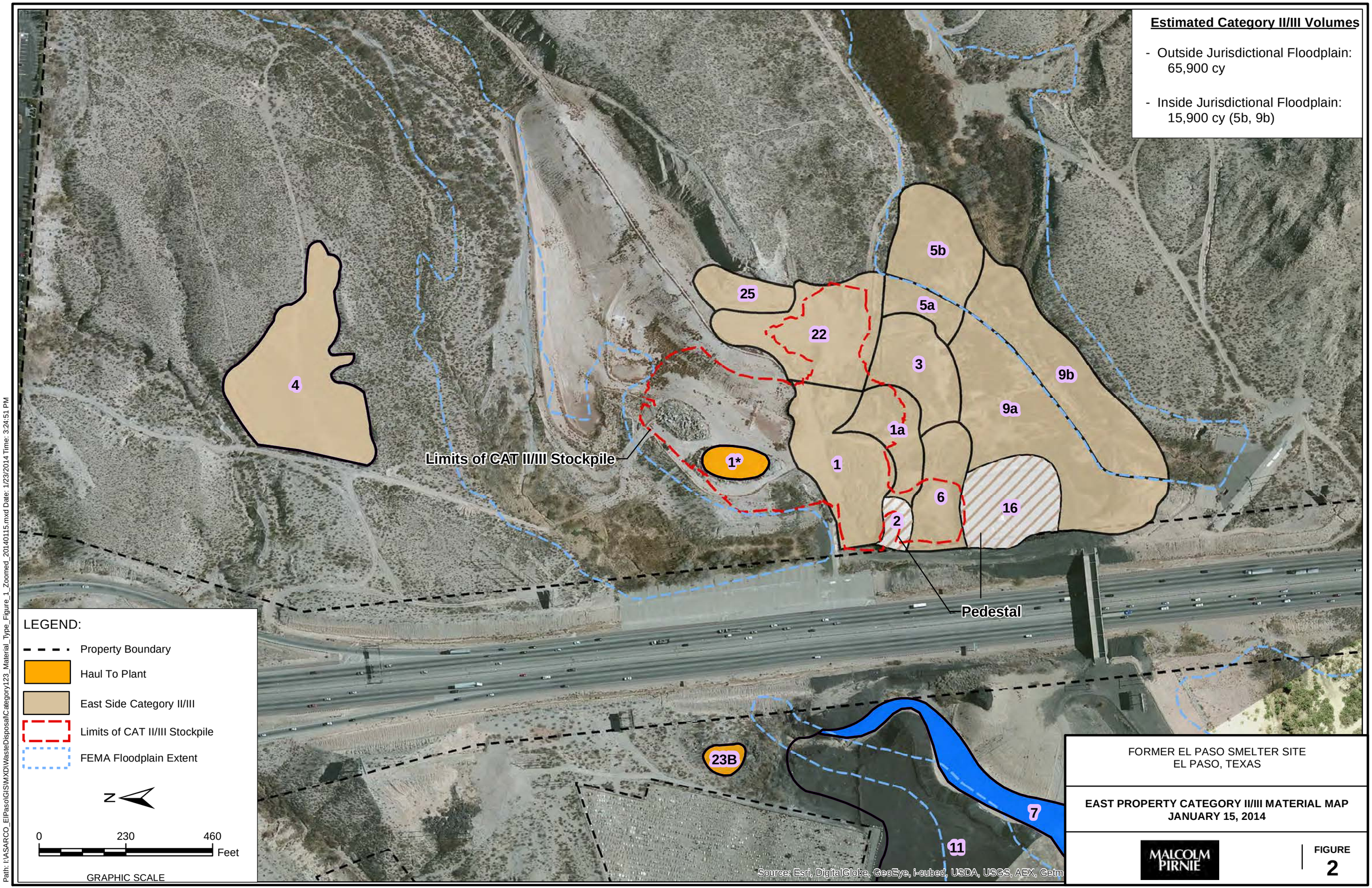

FORMER EL PASO SMELTER SITE
EL PASO, TEXAS

EAST PROPERTY CATEGORY II/III MATERIAL MAP
JANUARY 15, 2014

MALCOLM PIRNIE

FIGURE
2

CITY: Highlands Ranch DIV/GROUP: GIS DB: BG
Project (Project #)
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