

ATTACHMENT 1C.2.2

Category II Stockpile/Material Storage Area
East Property Assessment Area



ARCADIS

Category II Stockpile/Material Storage Area East Property Assessment Area

Introduction

Historically, portions of the East Property Assessment Area (East Property AA) were used for the disposal/placement of Category I and II and other waste materials, such as broken concrete. As part of its Response Action for this area, Texas Custodial Trust (TCT) excavated this historically placed Category II and III material in 2014. The historical material was excavated until the protective concentration levels (PCLs) for direct contact with commercial/industrial soil (C/I $^{Tot}Soil_{Comb}$) or direct contact with residential soil (Residential $^{Tot}Soil_{Comb}$) were achieved as verified by confirmation samples. The excavation activities and confirmation sample results are presented in Attachment 1C.2.1 of this Soil Response Action Completion Report (Soil RACR).

TCT also proposed to create a Category II/III stockpile area or “material storage area” within the East Property AA. Because the area is planned for redevelopment, TCT proposed to place the stockpile material on demarcation fabric and clean soil to delineate the thickness of impacted material, and to place the impacted material as engineered fill. TCT would then cover the material storage area with an evapotranspirative (ET) soil cover. TCT submitted the following documents regarding this response action:

- Letter to TCEQ dated December 7, 2012 regarding East Borrow Source Environmental Sampling Procedures for Interim Channel Backfill and East Category I Landfill Removal Plan
- Letter to TCEQ dated January 23, 2014 regarding Location and Configuration of Category II/III Stockpile on East Property (Attachment 2A-6 in the Response Action Plan (RAP, Arcadis 2016e))
- Site Cover Modeling (Geosyntec Consultants April 2015) (RAP Appendix 3.7 (Arcadis 2016e))
- Letter to TCEQ dated April 8, 2015 regarding Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Covers (**included in this Attachment**)
- Letter to TCEQ dated July 23, 2016 regarding Response to Comments – Plant Cover System (**included in this Attachment**)

Regulatory Approval

- Letter from TCEQ dated February 5, 2014 regarding Acknowledgement of Receipt and Notice to Proceed, Location and Configuration of Category II/III Stockpile on East Property, dated January 23, 2014 (RAP Attachment 2A-6);
- Letter from TCEQ dated August 17, 2015 Regarding TCEQ Approval of Response to May 22, 2015 TCEQ Comment Letter, dated July 23, 2015, Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Cover System (**included in this Attachment**)

Response Actions

TCT selected an upland well-drained area on the East Property AA for establishment of the Category II/III Material Storage Area. TCT placed demarcation fabric within the footprint of the Category II/III Material Storage Area to provide a visual demarcation between Category II material and underlying soil. Category II and III fill that had been removed from the East Property (see Attachment 1C.2.1 of this Soil RACR) was then placed and compacted as described in the construction quality control (CQA) report **included in this Attachment**. TCT will place an ET soil cover on the stockpile in 2017.

Supporting Documentation Included in This Attachment

- Letter from TCEQ dated August 17, 2015 Regarding TCEQ Approval of Response to May 22, 2015 TCEQ Comment Letter, dated July 23, 2015, Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Cover System
- Letter to TCEQ dated April 8, 2015 regarding Proposed Plant Site Evapotranspirative Soil, Asphalt and Flexible Membrane Covers
- Letter to TCEQ dated July 23, 2015 regarding Response to Comments – Plant Cover System
- Construction Quality Assurance Report, Placement of Category II and Category III Material for East Property Stockpile (Arcadis 2017)