

ATTACHMENT 1C.2.3

Establishment of East Borrow Source Area
East Property Assessment Area



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Introduction

During Response Action activities, Texas Custodial Trust (TCT) sought to create an area from which clean soil could be moved and placed as backfill in other areas of the site. Within the East Borrow Source (EBS), TCT planned to remove desert armor (rocky surface soil containing vegetation and woody debris) and collect samples using the same approach used for confirmation sampling (one 5-point composite sample per 50-ft by 50-ft grid square) to document that the soil has concentrations of COCs below Texas Risk Reduction Program protective concentration levels (PCLs) for direct contact with residential soils (residential ^{Tot}Soil_{Comb} PCLs). Following verification through review of analytical results, the soil could be placed as backfill elsewhere on the site. The following documents further describe the proposed activities:

- Letter to Texas Commission on Environmental Quality (TCEQ) dated December 7, 2012 regarding East Borrow Source Environmental Sampling Procedures for Interim Channel Backfill and East Category I Landfill Removal Plan (included in this attachment to the 2016 Soil Response Action Completion Report [2016 Soil RACR])
- RAP Worksheet 1.0, page 12 – use of East Borrow Source for clean cover soil

Regulatory Approval

Following review of the letter to TCEQ dated December 7, 2012 describing the proposed activities, TCEQ provided approval in the following document:

- Letter from TCEQ dated December 10, 2012 regarding TCEQ Approval on East Borrow Source Sampling Procedures and Category I Landfill Removal Plan (included in this Attachment to the 2016 Soil RACR)

Response Actions

In accordance with the December 7, 2012 letter to TCEQ, TCT completed the following activities:

- Overlaid a 50-ft by 50-ft grid on a map of the EBS area (Figure 1 in this Attachment to the 2016 Soil RACR)
- Removed up to 2 feet of soil containing desert armor and vegetation from the area using dozers and excavators and stockpiled removed materials on the perimeter of the EBS
- Performed the additional step of screening using XRF
- If XRF results exceeded the TRRP Residential criteria, additional soil was removed and samples retaken
- Collected 5-point composite soil samples within each grid square and submitted for chemical analysis
- If analytical results did not exceed the TRRP Residential criteria, the soil was excavated and used as clean backfill

Supporting Documentation Included in This Attachment

- 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 from TCEQ regarding TCEQ Approval on East Borrow Source Sampling Procedures and Category I Landfill Removal Plan, dated December 10, 2012