ATTACHMENT 1C.3.1

Rubber Pond and Plant Entrance
Plant Entrance Arroyo Assessment Area

ARCADIS

Rubber Pond and Plant Entrance
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Introduction

One of two existing lined stormwater retention ponds at the site is referred to as the "Rubber Pond" and is in the Plant Entrance Arroyo Assessment Area (Plant Entrance AA), as shown on Figure 2-1 in Appendix 2.5 of the Response Action Plan (RAP, Arcadis 2016e). Texas Custodial Trust (TCT) identified a PCLE zone based on concentrations of arsenic and lead in soil surrounding this pond (Table 1 in RAP Appendix 2.5). The steep slopes and stormwater runoff from the plant site make removal less feasible for addressing soils with elevated concentrations of COCs in areas around the pond. Therefore, in 2017 TCT proposes to apply a surface sealant to the protective concentration level exceedance (PCLE) zone around the stormwater pond. These activities are described in the following sections of the RAP (Arcadis 2016e):

- RAP Worksheet 1.0 (page 24) – exposure pathways
- RAP Worksheet 2.0 (page 6) – soil covers
- RAP Figure 16 Plant Entrance Response Action – location of Rubber Pond
- RAP Attachment 2A.15 – summary of investigation activities and sample results

At the south entrance to the plant site in the Plant Entrance AA, TCT identified a PCLE zone around the paved, low-lying truck entrance, as described on page 9 of Worksheet 1.0 in the RAP (Arcadis 2016e). The PCLE zone is based on concentrations of arsenic and lead above the protective concentration levels (PCLs) for direct contact with commercial/industrial soils (C/I $^{Tot}Soil_{Comb}$) in the upper two feet of soil. As a response action, TCT planned to scrape surface soils in this area to remove elevated hot spot concentrations principally of arsenic and lead along the truck access roadway. Most of the plant entrance area would then be sprayed with soil stabilization material (surface sealant). These activities are described in the RAP (Arcadis 2016e):

- RAP Worksheet 1.0 (page 9) – description of soil issues
- RAP Worksheet 1.0 (page 24) – exposure pathways
- RAP Worksheet 2.0 (page 3) – description of response action
- RAP Worksheet 2.0 (page 6) – soil covers
- RAP Figure 16 Plant Entrance Response Action
- RAP Attachment 2A.15 – summary of investigation activities and sample results

Regulatory Approval

- Letter from TCEQ from dated December 27, 2016 regarding Approval of the following documents: Response to TCEQ comments dated September 19, 2016, dated November 22, 2016; Response to TCEQ e-mail comments dated December 7 and 20, 2016; and Revised Response Action Plan, dated August 16, 2016

Response Action

In the PCLE Zone on the slopes of the stormwater retention pond, TCT will apply surface sealant During 2017 field activities.

Near the plant entrance, TCT proposed to remove soil from two areas along the eastern and western sides of the road, as described in the RAP Worksheet 2 and shown on RAP Figure 16. In January 2016 TCT focused its activities on the eastern side of the road and removed soil to a depth of between 1 foot and 2 feet bgs within the area shown on Figure 1 in this attachment. During development of the RAP, a larger area was anticipated to be excavated; however, during field activities excavation of this area was limited due to steep slopes and the proximity of adjacent roads and railroad infrastructure. TCT placed the excavated soil on the South Pad subgrade as Cat II material. Results of the confirmation sample (Table 1 of this attachment) show that remaining soil exhibits concentrations below the TRRP PCLs for direct contact with commercial/industrial soils. The remaining areas shown on Figure 1 included in this attachment will be covered by a surface sealant in 2017.

Supporting Documentation Included in This Attachment

- Table 1 Summary of Confirmation Sampling Analytical Results - Plant Entrance Area
- Figure 1 Plant Entrance Response Action