

# ATTACHMENT 1C.4.3

Cell 3 Cover Reconstruction  
Plant Site Assessment Areas



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## Cell 3 Cover Reconstruction Plant Site Assessment Areas

### Introduction

Cell 3 is a landfill located on the Plant Site. To prepare the Plant Site for redevelopment and meet TCEQ requirements to move a portion of the Cell 3 to Cell 4, a reasonably flat surface needed to be prepared. Therefore, because Cell 3 was mounded, the cover and the upper Category I contents required removal Cell 4.

One of the Response Action objectives for soil remediation at the site noted on page 5 of Worksheet 1 in the Response Action Plan (RAP, Arcadis 2016e) is completing the cover installation and closure requirements of the Cell 3 Landfill and establishing the landfill as a Waste Control Unit (WCU).

The following sections of the RAP describe the Response Action to cover and close Cell 3:

- RAP Worksheet 1.0, page 5 – Response action objective includes cover installation and closure of Cell 3
- RAP Worksheet 1.0, page 6 – Establish a WCU at Cell 3
- RAP Worksheet 1.0, page 16 – Response action at source area
- RAP Worksheet 2.0, pages 3 and 4 – Excavation of Category I material from Cell 3
- RAP Attachment 2A-2, Excavation and Sampling Work Plan for Category I Materials, Cell 3 Mounded Area – describes plan to sample and excavate mounded material in Cell 3, Cat I limits, temp cover plan, cross-sections
- RAP Attachment 2A-2, Cell 3, figure-liner and final cover system details

The design of the Cell 3 cover system is proposed to Texas Commission on Environmental Quality (TCEQ) in the following letter:

- Letter to TCEQ dated October 10, 2013 regarding Proposed Cell 3 Cover System
- Letter to TCEQ dated February 6, 2014 regarding Construction Status and Design Changes for Cell 3 Cover System

### Regulatory Approval

The following letters from TCEQ state that the Cell 3 cover system design and additional design changes, as well as the CQA report, were approved by TCEQ:

- Letter from TCEQ dated October 28, 2013 regarding Approval of Proposed Cell 3 Cover System
- Letter from TCEQ dated February 19, 2014 regarding Approval of Construction Status and Design Changes for Cell 3 Cover System
- Letter from TCEQ dated May 13, 2015 regarding Approval of CQA Report dated April 7, 2015

### Response Actions

Excavation of Category I material from the Cell 3 WCU in the Pond 5/6 Arroyo Assessment Area was performed as described in the work plan presented in Attachment 2A.2 of the RAP. Excavation was performed to lower the profile of the Cell 3 WCU from the previous elevation of 3,805 feet amsl to a final elevation of 3,788 feet amsl. Category I material was relocated from the Cell 3 WCU to the Cell 4 WCU in the Parker Brothers Arroyo. The work plan presented in Attachment 2A.2 of the RAP details the methodology for movement of Category I material from Cell 3 to Cell 4.

As described in this section's construction quality assurance (CQA) report, the Cell 3 cover reconstruction included the following:

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- Removal of existing cover
- Excavation of Cat I material and placement in Cell 4
- Installation of new cover liner
- Placement of cover material

The Response Action to maintain Cell 3 as a WCU was completed and the report entitled “Construction Quality Assurance Report, Category I Landfill – Cell 3 Cover System Reconstruction” documenting the reconstruction activities was submitted on April 7, 2015. TCEQ approved the CQA report in their letter “Approval of Construction Quality Assurance Report”, dated May 13, 2015.

## Supporting Documentation Included in This Attachment

- Letter from TCEQ dated February 19, 2014 regarding Approval of Construction Status and Design Changes for Cell 3 Cover System
- Letter from TCEQ dated May 13, 2015 regarding Approval of CQA Report dated April 7, 2015
- *Construction Quality Assurance Report, Category I Landfill – Cell 3 Cover System Reconstruction, Former ASARCO Smelter Site, El Paso, Texas April 2015 (Malcolm Pirnie 2015)*