VIA CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

David C. Keith
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39564

RE: USACE Armor Cap Reassessment of Western Berm
Administrative Order on Consent for Time Critical Removal Action
CERCLA Docket No. 06-12-10
San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas

Dear Mr. Keith:

In response to concerns about the integrity of the armor cap placed following a July 2012 storm event, the Environmental Protection Agency (EPA) has requested a third party review from the U.S. Army Corps of Engineers (USACE). Although the focus of USACE final reassessment report was the western berm, the conclusions, specifically items one and three, concerning the design and construction respectively, are applicable to the entire armor cap. Attached is the final USACE document, *Review of Design, Construction and Repair of TCRA Armoring for West Berm of San Jacinto Waste Pits*, October 2013.

EPA has conducted an internal review of the USACE report mentioned above. In response to the conclusions in the report, which has identified both design and construction concerns with the armor cap, EPA is requesting the Respondents to take immediate action to address the concerns in the report.

Specifically, the EPA is requesting the Respondents submit an Armor Cap Repair Workplan that addresses the conclusions identified in the USACE report, to the extent the conclusions impact the armor cap's protectiveness until the final remedy at the site can be implemented. A draft Workplan is due to EPA within 30 days after receipt of this letter. The draft Workplan is subject to EPA review and approval. The Respondents will detail in the Workplan what action will be used to correct or address the concerns identified in the USACE report along with a detailed construction schedule for completion of the repair.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to leos.valmichael@epa.gov.

Sincerely yours,

Valmichael Leos
Federal On-Scene Coordinator

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