ANCHOR QEA

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June 27, 2011

Mr. Valmichael Leos
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto River Waste Pits Superfund Site
TCRA Weekly Progress Report No. 033 for June 20-24, 2011;
U.S. EPA Region 6, CERCLA Docket No. 06-12-10

Project Number: 090557-01

Dear Mr. Leos:

Attached please find TCRA Weekly Progress Report No. 033 for June 20-24, 2011.

This report was prepared on behalf of the International Paper Company and McGinnes Industrial Maintenance Corporation for the San Jacinto River Waste Pits Superfund Site in Channelview, Texas. Should you have any questions, please contact me at (228) 818-9626 or email me at dkeith@anchorqea.com.

Sincerely,

John P. Laplante for David C. Keith
Project Coordinator

9549591

cc: Barbara Nann, USEPA
Phil Slowiak, International Paper
Andrew Shafer, MIMC
Jennifer Sampson, Integral

TCRA Weekly Progress Report No. 033
Submitted June 27, 2011
San Jacinto River Waste Pits Superfund Site
USEPA Region 6, CERCLA Docket No. 06-12-10
Channelview, Texas

This weekly progress report is submitted pursuant to the Administrative Settlement Agreement and Order on Consent for Removal Action: CERCLA Docket No. 06-12-10, Channelview, Texas, which became effective on May 11, 2010 (AOC). The Respondents are International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC).

A. Summary of Work Performed – Dates: June 20-24, 2011

The Respondents, Anchor QEA, and USA Environment, completed work on the following tasks:

- Submitted TCRA Weekly Progress Report No. 032 on June 20, 2011.
- Construction Activities
    - Continued to stockpile and manage armor cap aggregates at the LaBarge Site.
    - Continued to stockpile and manage armor cap aggregates within the Texas Department of Transportation (TxDOT) right of way (ROW) Laydown and Stockpile Area.
    - Completed placement of Armor Cap B/C rock in the Western Cell of the San Jacinto River Waste Pits (SJRWP). Note that Armor Cap B/C rock was also used to complete the small remaining Armor Cap A area at the northern end of the Western Cell of the SJRWP.
- Completed survey probing of cap aggregate thickness in selected water-side placement areas of the SJRWP.
- Continued to maintain the turbidity curtain surrounding the water-based placement area.
- Continued to perform visual monitoring of water quality to evaluate potential construction-related turbidity impacts as described in the Final Removal Action Work Plan (RAWP). No water quality issues were noted based on these visual observations over the past week.
- Continued to maintain the Administration Site.
- Continued to implement site security measures as described in the Site Security Plan.

Attached is a figure that depicts the approximate limits of initial cap material placement through the date set forth on the figure, subject to the engineer's final verification survey upon completion of the project.

B. Summary of Agency Communications

The written communications between the Respondents and USEPA, including and subsequent to the issuance of the RAWP, are summarized in the attached Table 1.

C. Summary of Sampling Results

None for this report.

D. Problems, Delays, and Solutions

The turbidity curtain is potentially subject to movement due to the currents and tides. The contractor is performing ongoing maintenance of the turbidity curtain on an as-needed basis.

Respondents continue to dispute USEPA's allegations contained in USEPA's Notices of Violations dated January 14, January 21, January 24, and on April 4, 2011, submitted an additional notice of dispute to USEPA with respect to USEPA's Notice of Violation dated March 3, 2011, and certain statements contained in two other letters from USEPA dated March 3, 2011. They also dispute USEPA's rejection by letter dated February 16, 2011, of their force majeure claim, and submitted a Notice of Dispute to USEPA on March 18, 2011, in response to that letter.

Access into the Western Cell and Eastern Cell of the SJRWP from the upland was initially hampered by soft soil conditions. The Eastern Cell of the SJRWP was accessed from the water-side to the greatest extent possible to minimize the potential for soft sediment displacement associated with construction activities. Some of the work on the Eastern Cell, however, was performed from the land. Portions of the Western Cell of the SJRWP were stabilized to improve access into the cell and facilitate cap construction in this area. Cement stabilization of soft areas in the Western Cell and use of lighter equipment has allowed satisfactory access to allow placement of required granular fill leveling course layer, geotextile underlayment, and LLDPE geomembrane.

E. Projected Work for the Next 2 Weeks – Dates: June 27-July 8, 2011

The Respondents, Anchor QEA, and USA Environment, expect to complete the following tasks in the next 2 weeks:

- Continue to develop a summary report of the data collected during water quality monitoring.
- Continue to implement the Site Security Plan.
- Continue to maintain the Administration Site as necessary.
- Continue to stockpile and manage armor cap aggregates at the LaBarge Site and TxDOT Laydown and Stockpile Area.
- On the TxDOT ROW, proceed to haul vegetation, debris, and soil that were cleared from beneath the I-10 Bridge for off-site disposal, subject to resolving arrangements for disposal of tires that are part of the debris.
- Continue placement of Armor Cap D material in the Western Cell of the SJRWP.
- Continue to place additional cap material in areas identified by survey probing to not have met the required minimum thickness.

F. Schedule

Attached is the approved project construction schedule, which is being included as directed by USEPA in a letter from Valmichael Leos to David Keith of Anchor QEA dated February 10, 2011. The approved construction schedule is out of date, as it references armor cap materials whose designations have now changed (as explained in the approved RAWP) and includes "start" and "finish" dates for these materials that are no longer applicable since the sequencing of placement of the construction materials has also changed, as explained in the approved RAWP. Note that armor cap material designations referred to above are based on the approved RAWP. A proposed updated project construction schedule, based on Respondents having obtained access to the TxDOT ROW, and secured a lease for a laydown area and dock facility, was transmitted to USEPA on February 14, 2011. Respondents prepared the updated project construction schedule pursuant to USEPA's direction, and it further revises and updates the schedule presented and submitted to USEPA at a January 31, 2011, meeting. On March 3, 2011, USEPA provided a letter indicating the proposed schedule is not approved and invited Respondents to request a meeting with USEPA if desired. A meeting with USEPA regarding the

schedule took place on March 24, 2011, and based on that meeting, the Respondents did not submit a revised schedule. Respondents anticipate that this matter will be reviewed with USEPA in June/July 2011.

Table 2 presents a summary list of the major cap construction elements and their dates of completion. Please note that the tasks set out in Table 2 do not coincide with the tasks listed in the approved project construction schedule since, as discussed above, the approved schedule is out of date. In addition, the material designations referred to below are based on the approved RAWP, which contains material designations that differ from those referred to in the out-of-date approved project construction schedule.

Table 2 – Summary of Cap Construction Elements

Task	Date Completed
Water-side geotextile placement	May 16, 2011
Water-side placement of Cap A material	May 19, 2011
Water-side placement of Cap C material	May 13, 2011
Water-side placement of Cap D material	May 16, 2011
Clearing and grubbing of Western Cell	April 8, 2011
Stabilization of Western Cell	May 17, 2011
Land-side granular fill placement in Western Cell	May 24, 2011
Land-side LLDPE placement in Western Cell	June 1, 2011
Land-side placement of Cap A material[1]	May 19, 2011
Land-side placement of Cap B/C material	June 24, 2011
Land-side placement of Cap D material	On-going

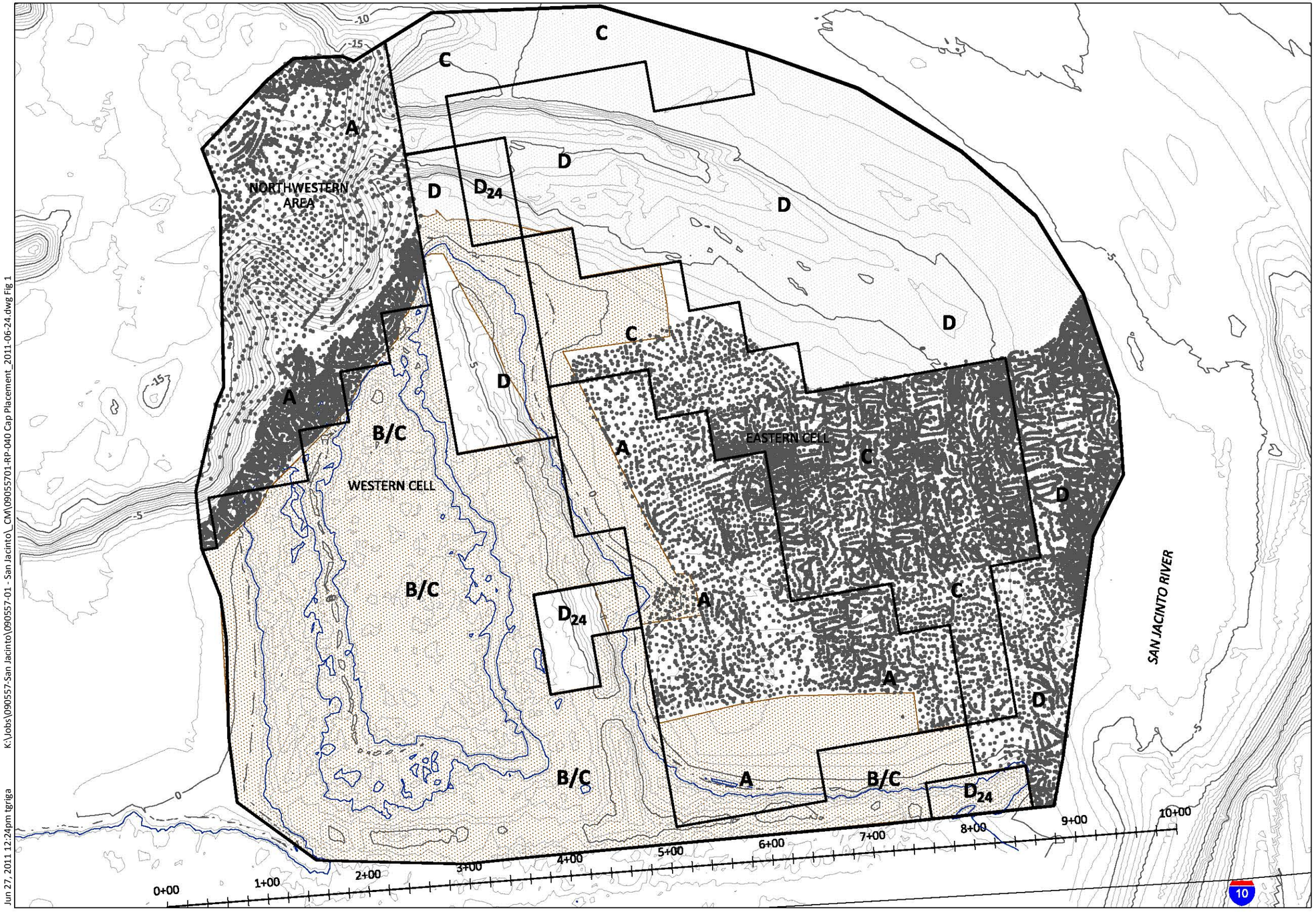
1. On June 24, the more protective Cap B/C rock was placed in a small portion of the Western Cell in which Cap A rock was originally going to be placed to complete the work in this area.

Note that all construction elements are subject to Quality Assurance review and final approval by the engineer.

Prepared by:

John P. Laplante /for/

David C. Keith, Project Coordinator



Legend:

- 1 ft Contour (6/12/10)
- Removal Action Work Plan Required Limits of Capping
- D — Armor Cap Type
- Approximate Footprint of Land Based Placement through 6/24/11
- Approximate Footprint of Water Based Placement through 3/25/11
- TopCon Data (3/28/11 to 5/19/11)
- MHHW (1.52 ft NAVD88)

Notes:

1. Contours from survey on 06/12/2010.
2. Horizontal Datum: Texas South Central, NAD83. US Survey Feet.
3. Vertical Datum: NAVD 88.
4. Note that this figure depicts areas worked but does not mean that these areas have been accepted as complete. All cap areas are subject to QA/QC review to ensure required cap thickness has been achieved.
5. TopCon data represent approximate limits of daily placement.

0 100
Scale in Feet

K:\Jobs\090557-San Jacinto\090557-01 - San Jacinto_CM\09055701-RP-040 Cap Placement_2011-06-24.dwg Fig 1

Jun 27, 2011 12:24pm tgriga

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Figure 1
Cap Material Placement Progress - June 24, 2011
SJRWP TCRA

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
11/1/2010	Draft Final Removal Action Work Plan (RAWP) for Time Critical Removal Action	11/8/2010	TCRA Work Plan Approval with Modifications	
11/1/2010	Report on Respondents' best efforts to obtain access			
		11/2/2010	Letter from B. Nann regarding access	
11/9/2010	Memorandum - Review of Geomembrane Comments			
		11/9/2010	Email from B. Nann to Axe/Inglin requesting conference call on November 15, 2010 regarding TCRA access issues	
11/11/2010	Draft Pre-construction Meeting Agenda			
11/11/2010	Final Removal Action Work Plan (RAWP) for Time Critical Removal Action			
11/12/2010	Letter to EPA regarding access			
11/15/2010	Conference call with EPA B. Nann regarding access			Conference call to discuss the technical memorandum about water access versus land access to the TCRA Site. B. Nann stated that RAWP approval occurred 11/8/2010
11/15/2010	TCRA Weekly Progress Report 001 email from J. Laplante to V. Leos and five hard copies			
11/16/2010	Marine Access memo email from D. Keith to USEPA C. Sanchez			Email to USEPA technical team regarding issues related to water-only access to the TCRA site
		11/16/2010	Email from B. Nann to Respondents regarding meeting with Sam Coleman regarding access by water	
11/17/2010	Teleconference between D. Keith and C. Sanchez and V. Leos to discuss the 11/18 technical meeting at USEPA regarding site access			
		11/17/2010	Email from B. Nann to Respondents and TxDOT regarding meeting in Dallas on access issues	
11/17/2010	Email from IP counsel to B. Nann transmitting draft TxDOT license agreement			
11/17/2010	Emails from IP and MIMC counsel to B. Nann regarding meeting with Sam Coleman regarding access			Meeting with Sam Coleman, USEPA Superfund Division Director, to discuss access issues. Meeting took place 11/18/2010.
11/18/2010	Submittal of financial assurance by MIMC to cover revised TCRA cost estimate			
11/22/2010	TCRA Weekly Progress Report 002 email from J. Laplante to V. Leos and 5 hard copies			
11/22/2010	Financial assurance submission by IP with respect to the revised TCRA financial assurance amount			
11/23/2010	Submitted Notice of Start of Construction letter to USEPA			
11/23/2010	Prepared and submitted Request for State Historic Preservation Officer Consultation Form and supplemental information to Mark Wolfe, State Historic Preservation Officer			
11/29/2010	TCRA Weekly Progress Report 003 email from W. Mears to V. Leos and 5 hard copies			
11/30/2010	Submitted Request for Section 401 of the CWA Consultation Review to S. Reilly of TCEQ, with copy to V. Leos			
11/30/2010	Preliminary (unvalidated) Big Star property chemistry data submitted to V. Leos by D. Keith via email			
11/30/2010			Email from V. Leos of USEPA regarding status of preliminary data from Big Star soil sampling	
11/30/2010			Email from B. Nann of USEPA to Respondents' counsel regarding the status of the Big Star sampling results	
11/30/2010	Submitted proposed road license agreement with TxDOT, signed by Respondents' counsel, to B. Nann of USEPA			

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Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
11/30/2010	Submitted letter to EPA describing Respondents' "best efforts" to obtain access from Big Star and TxDOT and requesting an extension of time to obtain access	12/3/2010		
12/1/2010	Email from MIMC's counsel on behalf of Respondents to B. Nann urging USEPA's quick turnaround on analysis of Big Star soil sample results			
12/1/2010	Email to V. Leos from Project Coordinator updating Big Star soil sampling data			
12/2/2010			Email from B. Nann to Respondents' counsel regarding status of USEPA's analysis of Big Star's sample results and scheduling of conference call to discuss access issues	
12/2/2010	Email from IP Counsel on behalf of Respondents' to B. Nann and S. Coleman regarding obstacles to obtaining access from Big Star and TxDOT	12/3/2010		
12/3/2010			Email from B. Nann to Respondents' counsel and S. Coleman responding to Respondents' December 2, 2010 email regarding obstacles to obtaining access	
12/3/2010	Email from IP counsel on behalf of Respondents' to B. Nann and S. Coleman responding to EPA's December 3, 2010 email regarding access issues			
12/3/2010			Letter from USEPA responding to Respondents' November 30, 2010 letter regarding best efforts, denying extension of time to obtain access	
12/6/2010	TCRA Weekly Progress Report 004 email from J. Laplante to V. Leos and five hard copies			
		12/6/2010	Email from B. Nann to Respondents' counsel regarding TxDOT and Big Star access issues and status of Big Star as PRP	
12/6/2010	Email from IP counsel to B. Nann of behalf of Respondents' regarding van der Horst Site access agreement	12/6/2010	Email from B. Nann to Respondents' counsel regarding van der Horst access agreement	
12/6/2010	Email from IP counsel to USEPA counsel handling van der Horst site regarding access agreement			
12/6/2010	Email from B. Nann to Respondents' counsel regarding scheduling of conference call on access issues			Conference call between Respondents' counsel and USEPA regarding TxDOT access takes place on December 7, 2010
12/6/2010	Email from IP counsel on behalf of Respondents' to B. Nann regarding proposed Big Star lease terms			
12/6/2010	Email from IP counsel on behalf of Respondents' to B. Nann regarding signed access agreement with Big Star for installation of Phase II fencing			
		12/7/2010	Email from B. Nann stating USEPA's approval of Big Star property as a laydown area	
12/7/2010	Email to B. Nann from MIMC counsel on behalf of Respondents' regarding scheduling of conference call with USEPA and Big Star regarding lease			
		12/7/2010	Email from B. Nann to Respondents' counsel regarding her call to Big Star attorney	
		12/7/2010	Email from B. Nann regarding status of proposed TxDOT access agreement language	
12/7/2010	Emails to B. Nann from IP counsel on behalf of Respondents' regarding proposed TxDOT license agreement			
12/7/2010	Email from IP counsel on behalf of Respondents' to B. Nann regarding status of her conversation with Big Star counsel			
		12/8/2010	Email from B. Nann to Respondents' counsel regarding TxDOT and Big Star access status	

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
12/8/2010	Email to B. Nann from IP counsel on behalf of Respondents' regarding TxDOT and Big Star access issues			
12/8/2010	Email to Big Star counsel and B. Nann from IP counsel on behalf of Respondents' regarding status of lease			
		12/8/2010	Email from USEPA counsel for van der Horst site regarding site access agreement with TxDOT	
12/8/2010	Email from IP counsel to USEPA counsel for van der Horst site regarding access agreement with TxDOT			
12/9/2010	Email from A. Shafer (MIMC) to V. Leos and S. Tzhone requesting guidance regarding sign size			
12/9/2010			Email from USEPA V. Leos with a copy of USEPA Pollution Report (POLREP) for the TCRA	
12/10/2010	Email to B. Nann from MIMC counsel on behalf of Respondents' regarding status of TxDOT and Big Star access issues			
12/10/2010	Email to B. Nann from IP counsel on behalf of Respondents' asking if B. Nann would schedule a conference call between Big Star, USEPA, and Respondents' counsel			
12/10/2010	Email to B. Nann from MIMC counsel on behalf of Respondents regarding Big Star Status as a PRP			
12/13/2010	TCRA Weekly Progress Report 005 email from J. Laplante to V. Leos and five hard copies			
12/13/2010	Email to B. Nann from IP counsel on behalf of Respondents regarding status of Big Star and TxDOT access issues			
12/15/2010	Email to B. Nann from MIMC counsel on behalf of Respondents regarding Big Star's position on lease	12/16/2010	Email from B. Nann regarding Big Star's demand for a release of all claims	
12/17/2010	Email to B. Nann from IP counsel on behalf of Respondents regarding Big Star's position on access and requesting EPA's assistance			
12/17/2010	Email to B. Nann from IP counsel on behalf of Respondents asking for conference call to discuss Big Star's demand for a release as a condition of access			
12/20/2010	TCRA Weekly Progress Report 006 email from J. Laplante to V. Leos and five hard copies			
12/21/2010	Email to B. Nann from IP counsel on behalf of Respondents regarding latest demand for full release from Big Star counsel and requesting opportunity to discuss same			
		12/23/2010	Letter from USEPA V. Leos to Respondents in regarding TxDOT access	
12/27/2010	TCRA Weekly Progress Report 007 email from J. Laplante to V. Leos and five hard copies			
		12/27/2010	Email to Respondents' counsel from B. Nann of USEPA forwarding copy of EPA's 12/23/2010 correspondence (letter was not received by Respondents until it was forwarded by USEPA's counsel on December 27 and original sent by mail was not received until December 30, 2010)	

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		12/30/2010	Letter from USEPA V. Leos to Respondents in regarding TxDOT access, as followup to USEPA letter dated 12/23/2010	
12/30/2010	Letter to V. Leos of USEPA from MIMC counsel on behalf of Respondents in response to USEPA's letters dated 12/23/2010 and 12/30/2010 and initial force majeure notice			
1/3/2011	TCRA Weekly Progress Report 008 email from J. Laplante to V. Leos and five hard copies			
1/4/2011	Email to USEPA from D. Shafer of MIMC regarding delivery of TCRA financial assurance instruments to EPA on 11/19/2010			
1/4/2011	Letter to V. Leos of USEPA from MIMC counsel regarding force majeure event			
1/4/2011	Letter to V. Leos of USEPA from IP counsel joining in MIMC's letter dated 1/4/2011 regarding force majeure event			
1/4/2011	Memorandum to V. Leos of USEPA on the Evaluation of the Potential Change in Water Surface Elevation Due to the Placement of the Capping Remedy			
		1/4/2011	Letter to MIMC from V. Leos of USEPA regarding financial assurance	
1/5/2011	Letter to EPA from IP counsel on behalf of Respondents regarding access issues and notice of force majeure			
		Undated	Letter to Respondents' Project Coordinator from V. Leos regarding USEPA's site inspection of December 8, 2010 and upcoming scheduled work activities. The letter was received on 1/6/2011.	
		1/6/2011	Email to D. Shafer of MIMC from B. Werner of USEPA regarding need for duplicates of TCRA financial assurance instruments	
1/6/2011	Email from D. Shafer of MIMC on behalf of Respondents regarding Site signs and buoys and intent to inspect fencing and signs on 1/7/2011			
		1/7/2011	Email from V. Leos of USEPA stating that representatives from Harris County and TCEQ and himself would be visiting the Site on 1/7/2011	
1/10/2011	TCRA Weekly Progress Report 009 email from J. Laplante to V. Leos and five hard copies			

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
1/12/2011	Email to B. Nann of USEPA from MIMC's counsel on behalf of Respondents regarding TxDOT and Big Star access issues and Big Star's prospective status as a PRP	1/13/2011	Email from B. Nann of USEPA to Respondents' counsel (in response to 1/12/2011 email from MIMC's counsel) regarding TxDOT negotiations, alternative laydown area, and Big Star's status as PRP	
1/13/2011	Email from IP's counsel to B. Nann of USEPA responding to her 1/13/2011 email regarding TxDOT access negotiations	1/14/2011	Email from B. Nann of USEPA to Respondents' counsel responding to 1/13/2011 email from IP's counsel regarding TxDOT access negotiations	
		1/13/2011	Email from B. Nann of USEPA to Respondents' counsel (responding to 1/12/2011 email from MIMC's counsel) addressing "ability to pay" issue for Big Star	
		1/14/2011	Email from B. Nann of USEPA to Respondents' counsel transmitting USEPA letter regarding Notice of Violation	
1/17/2011	TCRA Weekly Progress Report 010 email from J. Laplante to V. Leos and five hard copies			
		1/19/2011	Email from B. Nann of USEPA regarding need to coordinate with USEPA regarding additional plans on TxDOT right-of-way	
1/19/2011	Email from MIMC counsel on behalf of Respondents to B. Nann of USEPA responding to her email of 1/19/2011 regarding additional plans for TxDOT right-of-way			
1/19/2011	Email from Respondents' Project Coordinator to USEPA and Respondents' counsel regarding her telephone conference with V. Leos of USEPA regarding proposed plans for the TxDOT right-of-way and intent to submit amendment to §404(b)(1) documentation.			
		1/21/2011	Email from B. Nann of USEPA to Respondents' counsel forwarding USEPA's 1/21/2011 NOV letter.	
1/24/2011	TCRA Weekly Progress Report 011 email from J. Laplante to V. Leos and five hard copies.			
		1/24/2011	Notice of Violation letter from USEPA regarding non-compliance with the TCRA AOC	
		1/24/2011	Email from B. Nann of USEPA to Respondents' counsel forwarding USEPA's 1/24/11 NOV letter.	
		1/24/2011	Email from V. Leos of USEPA to Respondents' Project Coordinator regarding need to coordinate all communications through B. Nann of USEPA.	
1/25/2011	Email from Respondents' Project Coordinator to V. Leos and B. Nann of USEPA regarding resolution of TxDOT access issue and desire to meet with USEPA regarding project schedule.			
1/26/2011	Follow-up email from Respondents' Project Coordinator to V. Leos and B. Nann of USEPA regarding desire to meet with USEPA to discuss project schedule.	1/26/2011	Email from B. Nann of USEPA stating that V. Leos would respond to the email of Respondents' Project Coordinator when he returns to his office.	
		1/27/2011	Email from V. Leos of USEPA to Respondents' Project Coordinator stating willingness of himself and B. Nann of USEPA to meet to discuss schedule.	
1/27/2011	Submitted to USEPA supplemental 401, 404(b)(1) and coastal consistency determinations to reflect changed conditions related to laydown, stockpiling, and truck turnaround areas in the TxDOT right-of-way on January 27, 2011.			
1/27/2011	Letter from Respondents to CAC members regarding Site status update.			

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
1/27/2011	Email from Respondents' Project Coordinator to USEPA notifying USEPA of the posting of an Addendum regarding Site Access Modifications and a Cultural Resources Addendum to the FTP Site.			
		1/27/2011	Email from V. Leos of USEPA to Respondents' Project Coordinator stating that until USEPA approves modification to Site Plans, Respondents must continue to follow existing work plan.	
		1/28/2011	Email from V. Leos of USEPA clarifying his 1/27/2011 email and stating that USEPA's reviews of Respondents' revised plans do not impede Respondents' ability to continue work at Site.	
1/28/2011	Email from Respondents' Project Coordinator to USEPA regarding meeting with USEPA on 1/31/2011, including attendees and agenda.	1/28/2011	Email from V. Leos of USEPA asking that "water access/barge needed for eastern pit" be added to agenda for 1/31/11 meeting.	
1/28/2011	Email from Respondents' Project Coordinator to V. Leos of USEPA confirming addition to agenda.			
1/28/2011	Letter from MIMC's counsel on behalf of Respondents to USEPA regarding supplement to Respondents' force majeure claims.			
		1/28/2011	Email from B. Nann of USEPA to Respondents and members of CAC regarding status of Site.	
		1/28/2011	Email from B. Nann of USEPA to Respondents' counsel seeking confirmation that no attorneys would be at 1/31/2011 meeting with L. Starfied and S. Coleman of USEPA.	
1/28/2011	Email from IP counsel to B. Nann of USEPA stating his understanding that no counsel would be present at 1/31/2011 meeting.			
1/31/2011	TCRA Weekly Progress Report 012 email from J. Laplante to V. Leos and five hard copies.			
1/31/2011	Letter from D. Keith to V. Leos and B. Nann requesting review and approval of attached revised TCRA construction schedule; reiterating request for review and approval of 401/404(b)(1) documentation relating to changes in TxDOT access, and requesting clarification on future communications between Respondents and USEPA.			
1/31/2011	Email from MIMC counsel to B. Nann of USEPA regarding planned attendees for 1/31/2011 meeting with L. Starfield, et al. of ESEPA.			
1/31/2011	Email from MIMC counsel to B. Nann of USEPA regarding lack of attendance of legal counsel at USEPA meeting regarding TCRA schedule.	1/31/2011	Emails from B. Nann of USEPA regarding 1/31/2011 meeting regarding TCRA schedule and attendance of legal counsel	
2/1/2011	USA Environment submittals 1, 2, and 3 (geotextiles and geomembrane) transmitted via email from J. Laplante to V. Leos and B. Nann.			
2/2/2011	USA Environment submittals 4 and 5 (CHASP and geotextile) transmitted via email from J. Laplante to V. Leos and B. Nann.			

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
2/3/2011	USA Environment submittals 6, 7, 8 and 9 (partial stone chemistry results; Armor Cap C and D gradation curves, list of subcontractors) transmitted via 2 emails from J. Laplante to V. Leos and B. Nann.			
2/4/2011	USA Environment submittals 10 and 11 (CWP, EPP, SWPPP) transmitted via email from J. Laplante to V. Leos and B. Nann.			
2/4/2011	Revised RAWP document transmitted via email from J. Laplante to V. Leos and B. Nann for review.			
2/7/2011	TCRA Weekly Progress Report 013 email from J. Laplante to V. Leos and five hard copies.			
2/8/2011	Copy of Market Street and LaBarge Site Lease Agreements sent via email and hard copy from J. Laplante to V. Leos and B. Nann.			
2/8/2011	Notification of TCRA subcontractors letter sent by email and hard copy from J. Laplante to V. Leos and B. Nann.			
		2/10/2011	Letter from USEPA V. Leos to D. Keith requesting that TCRA Weekly Updates include a copy of the approved TCRA Schedule instead of the proposed revised TCRA schedule.	
		2/10/2011	Letter from USEPA V. Leos to D. Keith approving Addendum Regarding Site Access Modifications, subject to additional clarifying text proposed by USEPA to be included in the Addendum.	
		2/10/2011	Letter from USEPA V. Leos to D. Keith requesting specific additional detail be provided in the proposed revised TCRA schedule.	
2/10/2011	Email to V. Leos of USEPA from D. Shafer of MIMC, on behalf of Respondents, regarding proposed Administration Site signs.	2/11/2011	Email from V. Leos of USEPA to Respondents approving Administration Site signs.	
2/11/2011	Minutes from February 4, 2011 USEPA Weekly Update teleconference sent via email from J. Laplante to V. Leos and B. Nann.			
2/14/2011	TCRA Weekly Progress Report 014 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
2/14/2011	Letter from MIMC counsel, on behalf of Respondents, to USEPA regarding notice of dispute relative to USEPA's January 14, 2011, Notice of Violation.	2/16/2011	Email from B. Nann of USEPA to Respondents' counsel transmitting USEPA's response to Respondents' force majeure claim.	
2/14/2011	J. Laplante submitted TCRA Detailed Schedule to V. Leos and B. Nann.			
2/15/2011	J. Laplante submitted to V. Leos and B. Nann information on Exclusion Zone and Restricted Zone as developed by Respondents' contractor USA Environment.			
		2/16/2011	Email from B. Nann of USEPA to Respondents' counsel regarding Respondents' notice of dispute relative to January 14, 2011, Notice of Violation.	
2/18/2011	J. Laplante submitted to V. Leos and B. Nann contact information for the Channelview Volunteer Fire Department via email.			

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
2/18/2011	J. Laplante submitted to V. Leos and B. Nann a draft Emergency Contingency Plan, as requested by USEPA, via email.			
2/22/2011	TCRA Weekly Progress Report 015 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
2/22/2011	Submittal via hand delivery of Respondents' Notice of Dispute relative to the January 21, 2011 NOV and the January 24, 2011 NOV.			
2/23/2011	Clarification of RAWP and Schedule Edits email from J. Laplante to V. Leos and B. Nann and five hard copies.	3/3/2011	Letter from V. Leos approving changes to Removal Action Work Plan, but not approving revised construction schedule	USEPA requested that Respondents schedule a meeting immediately if original schedule completion date of September 2, 2011 cannot be maintained
2/23/2011	USA Environment Submittal 10 - Approved Contractor Work Plan submittal email from J. Laplante to V. Leos and B. Nann and five hard copies.			
2/24/2011	Updated Analyte List email from J. Laplante to V. Leos and B. Nann.			
2/28/2011	TCRA Weekly Progress Report 016 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
3/1/2011	USA Environment Submittals 6a, 12, 13a, and 14 - Approved natural stone and processed concrete aggregate chemistry results, Armor Cap B/C gradation, and Contractor Site Security Plan submittals transmitted via email and hard copy from J. Laplante to V. Leos and B. Nann.			
		3/3/2011	Letter from USEPA V. Leos providing update on status of NOVs.	
		3/3/2011	Notice of Violation letter from USEPA regarding non-compliance with the TCRA AOC.	
		3/3/2011	Letter from V. Leos of USEPA to Respondents' Project Coordinator regarding Respondents' request to change Removal Action Work Plan and Work Schedule.	
3/3/2011	Notification of Proposed Non-Hazardous Landfill letter from J. Laplante to V. Leos.	3/4/2011	Approval of Respondent's selected Subtitle D Landfill sent via email from V. Leos to J. Laplante.	
3/7/2011	TCRA Weekly Progress Report 017 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
3/10/2011	Submittals 17 and 18 - Approved Armor Cap A gradation results, and LLDPE liner test results submittals transmitted via email and hard copy from J. Laplante to V. Leos and B. Nann.			
		3/11/2011	Email from B. Nann of USEPA to Respondents' counsel transmitting USEPA's response to Respondents' Notice of Dispute dated February 14, 2011.	
3/14/2011	TCRA Weekly Progress Report 018 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
3/17/2011	Revised Emergency Contingency Plan (ECP) sent from J. Laplante to V. Leos and B. Nann via email and hard copy.			
3/18/2011	Updated Notification of TCRA Subcontractors sent from J. Laplante to V. Leos and B. Nann via email and hard copy.			
3/18/2011	Submittal via hand delivery of Respondents' Notice of Dispute relative to USEPA's February 16, 2011, rejection of Respondents' force majeure claim.			

Table 1
Table of Agency Communications

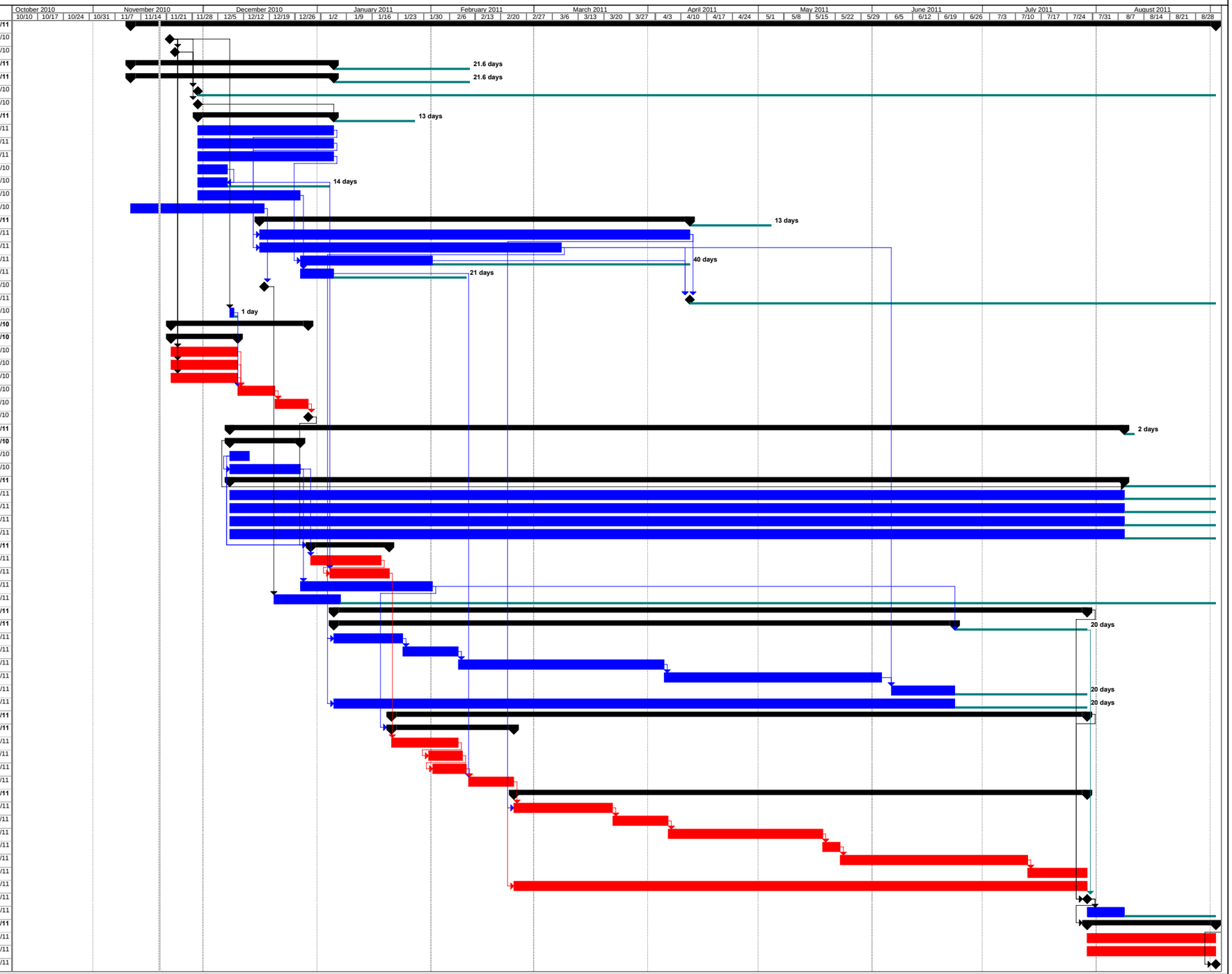
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
3/21/2011	TCRA Weekly Progress Report 019 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
3/28/2011	TCRA Weekly Progress Report 020 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
		3/28/2011	Letter from USEPA V. Leos to D. Keith requesting revision of weekly reports 017, 018, and 019 to remove the proposed revised schedule from these reports, and to cease inclusion of the proposed revised schedule in future weekly reports.	
4/4/2011	TCRA Weekly Progress Report 021 and amended Progress Reports No. 017, 018, and 019 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
		4/8/2011	Letter from USEPA V. Leos to D. Keith requesting a formal response to concerns regarding displacement of waste sludge that has been observed during cap construction activities.	
4/11/2011	TCRA Weekly Progress Report 022 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
4/14/2011	Submitted via email from J. Laplante to V. Leos and B. Nann approved contractor Submittals 19 and 20 and Cap Construction Progress Map to V. Leos and B. Nann and five hard copies.			
4/15/2011	Letter from D. Keith to V. Leos on behalf of Respondents as formal response to USEPA concerns about displacement of waste sludge observed during construction activities.			
4/15/2011	Submitted via email from J. Laplante to V. Leos and B. Nann copy of the Emergency Contingency Plan Marshalling Area figure for the SJRWP TCRA to V. Leos and B. Nann and five hard copies.			
4/18/2011	TCRA Weekly Progress Report 023 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
4/22/2011	Letter from J. Laplante to V. Leos requesting EPA review and approval of additional Subtitle D landfill for disposal of debris generated as part of TCRA construction activities sent via e-mail and 5 hard copies.	4/26/2011	Approval of Respondent's additional Subtitle D Landfill sent via email from V. Leos to J. Laplante.	
4/25/2011	TCRA Weekly Progress Report 024 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
5/2/2011	TCRA Weekly Progress Report 025 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
5/2/2011	Supplemental Work Plan for West Cell Access sent via email from J. Laplante to V. Leos and B. Nann			
5/3/2011	DRAFT Weather Day schedule sent via email from J. Laplante to V. Leos			
5/5/2011	Submitted via email from J. Laplante to V. Leos and B. Nann approved contractor Submittals 21 and 22 covering additional chemistry testing of import aggregates.			

Table 1
Table of Agency Communications

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
5/9/2011	TCRA Weekly Progress Report 026 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
5/16/2011	TCRA Weekly Progress Report 027 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
5/23/2011	TCRA Weekly Progress Report 028 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
5/31/2011	TCRA Weekly Progress Report 029 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
6/6/2011	TCRA Weekly Progress Report 030 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
6/13/2011	TCRA Weekly Progress Report 031 email from J. Laplante to V. Leos and B. Nann and five hard copies.			
6/16/2011	Provided USEPA-requested electonic survey information to V. Leos via FTP.			
6/20/2011	TCRA Weekly Progress Report 032 email from J. Laplante to V. Leos and B. Nann and five hard copies.			

-SCHEDULE-
SAN JACINTO RIVER WASTE PITS SUPERFUND SITE

ID	Task Name	Duration	Start	Finish
1	**SAN JACINTO WASTE PIT SUPERFUND SITE**	**164.6 days**	**Thu 11/11/10**	**Fri 9/2/11**
2	Contract Completion	0 days	Mon 11/22/10	Mon 11/22/10
3	Notice To Proceed	0 days	Tue 11/23/10	Tue 11/23/10
4	**Materials Procurment**	**28.6 days**	**Thu 11/11/10**	**Wed 1/5/11**
5	**Materials Lead Time**	**28.6 days**	**Thu 11/11/10**	**Wed 1/5/11**
6	Place Orders - Bouys and Signs	0 days	Mon 11/29/10	Mon 11/29/10
7	Place Orders - Materials	0 days	Mon 11/29/10	Mon 11/29/10
8	***Material Preparation Lead Time***	**20 days**	**Mon 11/29/10**	**Wed 1/5/11**
9	*Natural Stone (54,500 tons, 9 trains)*	20 days	Mon 11/29/10	Wed 1/5/11
10	*Processed Concrete (18,600 tons, 1,030 end dumps)*	20 days	Mon 11/29/10	Wed 1/5/11
11	*Filter Fabric (4 truck loads)*	20 days	Mon 11/29/10	Wed 1/5/11
12	*Access Road Filter Fabric*	5 days	Mon 11/29/10	Tue 12/7/10
13	*Access Road TxDOT Road Base*	5 days	Mon 11/29/10	Tue 12/7/10
14	*LLDPE*	15 days	Mon 11/29/10	Mon 12/27/10
15	*Bouys and signs*	20 days	Thu 11/11/10	Fri 12/17/10
16	**Materials Delivery**	**65 days**	**Thu 12/16/10**	**Tue 4/12/11**
17	Natural Stone	65 days	Thu 12/16/10	Tue 4/12/11
18	Processed Concrete	45 days	Thu 12/16/10	Tue 3/8/11
19	Filter Fabric (rock underlay)	20 days	Mon 12/27/10	Tue 2/1/11
20	LLDPE	5 days	Mon 12/27/10	Wed 1/5/11
21	Bouys and signs	0 days	Fri 12/17/10	Fri 12/17/10
22	Materials Delivery Complete	0 days	Tue 4/12/11	Tue 4/12/11
23	Preconstruction Conference	1 day	Wed 12/8/10	Thu 12/9/10
24	**Plans and Submittal**	**20 days**	**Mon 11/22/10**	**Wed 12/29/10**
25	**Preparation**	**10 days**	**Mon 11/22/10**	**Fri 12/10/10**
26	Project Work Plan	10 days	Mon 11/22/10	Fri 12/10/10
27	Site Specific HASP	10 days	Mon 11/22/10	Fri 12/10/10
28	QAPP	10 days	Mon 11/22/10	Fri 12/10/10
29	Submittal Review	5 days	Fri 12/10/10	Mon 12/20/10
30	Response to Comments/Final Documents	5 days	Mon 12/20/10	Wed 12/29/10
31	Final Approvals	0 days	Wed 12/29/10	Wed 12/29/10
32	**Construction**	**136 days**	**Wed 12/8/10**	**Mon 8/8/11**
33	**Project Set-up**	**10 days**	**Wed 12/8/10**	**Mon 12/27/10**
34	Mobilization	3 days	Wed 12/8/10	Mon 12/13/10
35	Big Star Property Improvements	10 days	Wed 12/8/10	Mon 12/27/10
36	**Site Management Activities**	**136 days**	**Wed 12/8/10**	**Mon 8/8/11**
37	Health and Safety	136 days	Wed 12/8/10	Mon 8/8/11
38	Quality Control	136 days	Wed 12/8/10	Mon 8/8/11
39	Survey Control	136 days	Wed 12/8/10	Mon 8/8/11
40	Site Security	136 days	Wed 12/8/10	Mon 8/8/11
41	**Access Road Construction**	**12 days**	**Thu 12/30/10**	**Thu 1/20/11**
42	Clear and Grub	10 days	Thu 12/30/10	Tue 1/18/11
43	Place Filter Fabric and Road Base	10 days	Tue 1/4/11	Thu 1/20/11
44	Environmental Protection	20 days	Mon 12/27/10	Tue 2/1/11
45	Sign and Bouy Installation	10 days	Mon 12/20/10	Fri 1/7/11
46	**Armor Cap Placement**	**116 days**	**Wed 1/5/11**	**Fri 7/29/11**
47	**Water Side Placement**	**96 days**	**Wed 1/5/11**	**Thu 6/23/11**
48	Armor Cap C2	10 days	Wed 1/5/11	Mon 1/24/11
49	Armor Cap B	9 days	Mon 1/24/11	Tue 2/8/11
50	Armor Cap E	32 days	Tue 2/8/11	Tue 4/5/11
51	Armor Cap D	34 days	Tue 4/5/11	Fri 6/3/11
52	Armor Cap A	11 days	Mon 6/6/11	Thu 6/23/11
53	Place Geotextile	96 days	Wed 1/5/11	Thu 6/23/11
54	**Land Side Placement**	**107 days**	**Fri 1/21/11**	**Fri 7/29/11**
55	**Western Cell Preparation**	**19 days**	**Fri 1/21/11**	**Wed 2/23/11**
56	Clear and Grub Peninsula	10 days	Fri 1/21/11	Tue 2/8/11
57	Shaping and Grading	6 days	Mon 1/31/11	Wed 2/9/11
58	Granular Fill (bedding)	6 days	Tue 2/1/11	Thu 2/10/11
59	LLDPE Placement	7 days	Fri 2/11/11	Wed 2/23/11
60	**Armor Cap Placement**	**88 days**	**Wed 2/23/11**	**Fri 7/29/11**
61	Armor Cap B	15 days	Wed 2/23/11	Tue 3/22/11
62	Armor Cap C1	9 days	Tue 3/22/11	Wed 4/6/11
63	Armor Cap C2	24 days	Wed 4/6/11	Wed 5/18/11
64	Armor Cap A	2 days	Wed 5/18/11	Mon 5/23/11
65	Armor Cap D	28 days	Mon 5/23/11	Wed 7/13/11
66	Armor Cap E	10 days	Wed 7/13/11	Fri 7/29/11
67	Place Geotextile	88 days	Wed 2/23/11	Fri 7/29/11
68	Substantial Completion	0 days	Fri 7/29/11	Fri 7/29/11
69	Demobilization	5 days	Fri 7/29/11	Mon 8/8/11
70	**Final Reports**	**20 days**	**Fri 7/29/11**	**Fri 9/2/11**
71	Redline Drawings	20 days	Fri 7/29/11	Fri 9/2/11
72	Narrative	20 days	Fri 7/29/11	Fri 9/2/11
73	Project Completion	0 days	Fri 9/2/11	Fri 9/2/11



Project: San Jacinto River Waste Pits Superfund Site
Draft Schedule
Date: Fri 11/19/10

Critical | Task | Progress | Slack | Summary | Rolled Up Critical | External Tasks | Deadline
Critical Split | Split | Milestone | Slippage | Project Summary | Rolled Up Critical Split | External Milestone