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May 11, 2015

Anne Foster
U.S. Environmental Protection Agency, Region 6
Office of the Regional Counsel (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto River Superfund Site ("Site")

Dear Ms. Foster:

McGinnes Industrial Maintenance Corporation ("MIMC") and International Paper Company ("International Paper") are in receipt of copies of the July 15, 2014 and February 24, 2015 letters from the Harris County Attorney's office to you ("the County Attorney's Letters") regarding the Site. This letter is submitted on behalf of MIMC and International Paper in response to the County Attorney's Letters.

In general, the County Attorney's Letters constitute an attack on International Paper and MIMC (together referred to herein as the "Respondents") and their technical consultants, Anchor QEA and Integral Consulting, as well as your office. The County Attorney's Letters are also a thinly veiled attempt to convince the U.S. Environmental Protection Agency ("EPA") to require the Respondents to develop additional unnecessary data and reconsider determinations made by it over the course of the last several years. The County Attorney's attempts to disrupt the CERCLA process should be rejected.

The RI/FS Investigation at the Site Has Been Unbiased and Consistent with EPA Requirements

As you know, all activities conducted by or on behalf of the Respondents under the November 2009 Unilateral Administrative Order ("UAO") for Remedial Investigation/Feasibility Study ("RI/FS") are required to be conducted in strict compliance with all applicable EPA guidance, policies and procedures and are subject to approval by the EPA. *See* UAO ¶ 5. This includes the selection of Respondents' consultants and the submittal of technical information by the Respondents' consultants. The close oversight and involvement of EPA at each step of the Superfund process

ensures integrity and transparency and prevents the biased, unscientific process that the County Attorney alleges in his letters has occurred. The position taken by the County Attorney would call into question the RI/FSs performed or being performed by responsible parties under the direction of EPA at the majority of Superfund sites, including many located within Region 6.

More specifically, with respect to the Respondents' work on the RI/FS, the UAO requires the RI/FS be conducted in accordance with the provisions of the UAO, the Statement of Work ("SOW") attached to the UAO, the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), the National Contingency Plan ("NCP") and EPA guidance, including, but not limited to the "Interim Final Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA" (OSWER Directive# 9355.3-01, October 1988 or subsequently issued guidance), "Guidance for Data Useability in Risk Assessment" (OSWER Directive #9285.7-05, October 1990 or subsequently issued guidance), guidance referenced in the OSWER guidance, and other guidance referenced in the SOW, as such guidance may be amended or modified by EPA. (UAO ¶ 53.) Respondents must also assure that all work performed, samples taken and analyses conducted under the UAO conform to the requirements of EPA-approved RI/FS Work Plans, the EPA-approved Quality Assurance Project Plan ("QAPP") and other guidance identified therein. (UAO ¶ 60.) All sampling and analyses performed pursuant to the UAO must conform to EPA's direction and approval regarding sampling, quality assurance/quality control ("QA/QC"), data validation, and chain of custody procedures. (UAO ¶ 80.)

With respect to the Feasibility Study ("FS"), in particular, the Respondents are specifically required by the UAO to evaluate the full range of alternatives described in the NCP. In evaluating the alternatives, Respondents are required by the UAO to address the factors required to be taken into account by Section 121 of CERCLA, 42 U.S.C. § 9621, and Section 300.430(e) of the NCP, 40 C.F.R. § 300.430(e). (UAO ¶ 53.)

The work at the Site is (and has been) an iterative process in which actions proposed by Respondents to comply with the UAO are subject to EPA review and approval at each step of the process. For example, under the UAO, "EPA reserves the right to comment on, modify and direct changes for all deliverables. Respondents must fully correct all deficiencies and incorporate and integrate all information and comments supplied by EPA either in subsequent or resubmitted deliverables." (UAO ¶ 54.) At numerous points in the process, EPA has directed that Respondents make substantive changes in deliverables based on EPA's review and comment on them. Respondents are not allowed to proceed further with any subsequent activities or tasks until receiving EPA approval for a deliverable. (UAO ¶ 55.)

EPA also has the authority to review the qualifications of Respondents' consultants and withhold approval of those consultants if the agency is not satisfied with

those qualifications. Specifically, within thirty (30) calendar days of the effective date of the UAO, and before work under the UAO had begun, Respondents were required to notify EPA in writing of the names, titles, and qualifications of the personnel, including contractors, subcontractors, consultants and laboratories to be used in carrying out the work. With respect to any proposed contractor, Respondents were required to demonstrate that the proposed contractor had a quality system which complied with ANSI/ASQC E4-1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995, or most recent version), by submitting a copy of the proposed contractor's Quality Management Plan ("QMP"). The UAO further requires that the QMP be prepared in accordance with "EPA Requirements for Quality Management Plans (QA/R-2),' (EPA/240/B-01/002, March 2001 or subsequently issued guidance) or equivalent documentation as determined by EPA. The qualifications of the persons undertaking the work for Respondents are subject to EPA's review, for verification that such persons meet minimum technical background and experience requirements. (UAO ¶ 52.) Further, not later than fourteen (14) days after the effective date of the UAO, Respondents were required to select their Project Coordinator and notify EPA in writing of the name, address, qualifications, job title and telephone number of that Project Coordinator. This person was required to have technical expertise sufficient to adequately oversee all aspects of the work contemplated by the UAO. EPA retained the right to disapprove of any designated Project Coordinator. (UAO ¶ 75.)

With respect to laboratories used by Respondents, Respondents are required to only use laboratories that have a documented quality system which complies with ANSI/ASQC E-4 1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995) and EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B-01/002, March 2001) or equivalent documentation as determined by EPA. (UAO ¶ 81.) Further, Respondents must ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with the appropriate EPA guidance. Respondents must also follow certain EPA guidance documents as appropriate for QA/QC and sampling: "Quality Assurance/Quality Control Guidance for Removal Activities: Sampling QA/QC Plan and Data Validation Procedures," OSWER Directive Number 9360.4-01, "Environmental Response Team Standard Operating Procedures," OSWER Directive Numbers 9360.4-02 through 9360.4-08. (UAO ¶ 80.)

Thus, the work performed by the Respondents and their consultants is performed under stringent parameters and subject at all times to EPA's careful oversight, comment and approval. At this particular Site, EPA has also provided copies of all of the Respondents' submittals to not only the Texas Commission on Environmental Quality ("TCEQ") and other state and federal agencies for their review and comment, but also to

the County, the Port of Houston Authority and the Galveston Bay Foundation.[1] In light of this tightly regulated and highly transparent process, no room exists for the alleged biased, unscientific submittals that the County accuses Respondents' consultants of submitting to EPA. Nor is it possible that submittals of that quality would have been approved by EPA over the last five and one-half years. It is also interesting that the County Attorney, who has had the opportunity to review every submittal by Respondents' consultants over the past five and one-half years, only chose to raise the issue of bias after EPA began evaluating alternatives for the remedial action at the Site.

In truth, the County Attorney's Letters are nothing more than an effort to disrupt the CERCLA process and second-guess EPA determinations made over a period of years during the course of the RI/FS. On July 17, 2014, just two days after the date of the County Attorney's July 15, 2014 letter, the County Attorney filed an unsuccessful motion with the Harris County District Court attempting to prevent the use of the Anchor and Integral reports in the Harris County litigation on the basis that they are biased and unscientific. Essentially the same arguments were raised in the County Attorney's motions that are raised in the July 15, 2014 letter. The County Attorney filed this motion after he was unable to obtain a ruling from the Court ordering the Respondents to produce privileged communications between Respondents and their consultants. The affidavits of the Respondents' in-house counsel (attached to the County Attorney's July 15, 2014 letter), were signed almost two years ago when the County Attorney first attempted to obtain the subject communications. The affidavits were prepared in support of Respondents' position that communications between Respondents and their joint consultants are privileged due to the ongoing Superfund process. They were not engaged, as the County Attorney appears to assert, as part of Respondents' defense to the County's claims. In short, Anchor and Integral were retained to assist the Respondents in the CERCLA process, not the litigation filed by Harris County which was filed several years after the Superfund process began.

Respondents' Consultants are Unbiased and Do Not Have a Conflict of Interest

In the course of the County's lawsuit, the County's lawyers requested the depositions of Dr. Keith of Anchor and Ms. Sampson of Integral despite the fact that they had not been designated as experts in the litigation. They were deposed as fact witnesses, not experts, and not as the corporate representatives of Anchor or Integral. Thus, Dr.

[1] In fact, both Harris County and the Port of Houston Authority entered into Memoranda of Understanding with EPA Region 6 (in December 2010 and October 2011, respectively), formally giving these two governmental entities the role of reviewing draft technical documents, draft final technical documents and final technical documents, and resolving the agencies' technical comments. These entities were also given the role of reviewing EPA Region 6's draft proposed plan regarding the Site remedy, as well as the draft Record of Decision. Thus, any legitimate technical concerns or comments that the County may have had with respect to any of Respondents' technical submittals could have been raised with Region 6 during the comment phase for each of the submittals. The issues addressed in the County Attorney's-Letters are being raised in the context of litigation by the County Attorney and should be viewed in that light.

Keith and Ms. Sampson testified as to the factual information they could recall at the time. A concern raised by the County Attorney in his July 15, 2014 letter is that these witnesses were unable to recall certain details of the RI/FS process at their depositions. It is not surprising that, in response to some of the County's questions, Dr. Keith and Ms. Sampson could not remember which Anchor or Integral scientist wrote which sections of the many reports submitted to EPA over the course of the preceding five years or information about the credentials of each of those authors. As the July 15, 2014 letter noted, they also testified that they could not absolutely agree with everything contained in all of the reports, in that statements in certain of the reports was included at the insistence of EPA, and sometimes over the objections of Anchor and Integral. They both testified unequivocally, however, that the reports prepared for the EPA were objective and not biased.

With respect to Ms. Sampson, for example, she testified as follows in her deposition in response to questions by counsel for the County Attorney's office:

> Q. Okay. When you're working as a project manager, or an even better question is when Integral and the people at Integral are working on the site in this context, in the context you're describing on Page 2 of Exhibit No. 1, they are supposed to be objective, correct?
> A. Yes.
> Q. Do you view yourselves as being advocates for the client's position when you --
> A. No.
> Q. All right.

(J. Sampson Depo., p. 45, ll. 6-16).

> Q. Does Jennifer Sampson, as the project manager for Integral, working on the San Jacinto River waste pits site as described on Page 2 of Exhibit No. 1 to your deposition, do you view yourself as an advocate for International Paper or MIMC's positions with regard to the work you're doing?
> A. I do not.
> Q. Okay. And do you view that the documents and other reports you're submitting to the EPA should be based upon your objective view of the evidence and data that you're collecting?
> A. Yes, there is interpretation of the data.
> Q. Okay. In interpreting the data that you're collecting, do you believe that it is your role to be an objective interpreter of that data?

A. Yes.

(J. Sampson Depo., pp. 45, l. 20 – 46, l. 10)

Q. In your role as a project manager for the site that we're here about today, do you view it as your role to be an objective interpreter of the data that you're collecting, or do you view that it is your role to be an advocate on behalf of your client, which in this case, I think, is International Paper?

. . .

A. Part of my role is to interpret the data, and I do so objectively. I have other roles as project manager.

Q. I see. And those other roles that don't involve interpreting the data objectively, do they involve advocating your client's position to the EPA?

. . .

A. My other roles include, as we discussed earlier, this coordination and communication roles described here in my resume on Exhibit 1 on Page 2. My other roles also include a process of communication and collaboration with EPA to get the project completed.

(J. Sampson Depo., pp. 47, l. 12 – 48, l. 6)

Dr. Keith testified as follows in his deposition in response to questions by counsel for the County Attorney's office:

Q. Did you consider your role or Anchor's role at those meetings to be advocating for MIMC and their position at the site?

. . .

A. No.

Q. What did you consider your role to be?

A. To provide a nonbiased evaluation of what we knew about the site and what we thought was the best path forward.

(D. Keith Depo, p. 59, l 9-18.)

Q. When you were working providing information at these community meetings, did you consider it your job to provide impartial factual information with regard to the site?

. . .

A. Yes.

(D. Keith Depo, p. 96, l, 11-16)

Q. We talked earlier, and I believe you said that the intent of the feasibility studies that you provided was to provide an unbiased look at the alternatives that were included in those reports. I want to ask you: With regard to information that you provided to the public with regard to the work at the site, is it your understanding that you were to provide unbiased, neutral information with regard to the work at the site in terms of your interaction with the public?

A. Yes.

. . .

Q. And would you agree with me, then, that it is not your -- it's not part of your job at the San Jacinto site to be an advocate for Waste or MIMC or International Paper and their preferred objectives at the site?

. . .

A. Our job is to provide an unbiased analysis of site conditions and make recommendations based on that condition.

Q. And to you, is it true, then, that you would consider that to be inconsistent, providing this unbiased approach -- it would be inconsistent with being an advocate for one alternative over the other alternative --

. . .

Q. -- as far as the recommended cleanup at the site?

. . .

A. Okay. Our job is to review the NCP criteria that you use in a feasibility study and objectively evaluate which alternative meets those criteria the best, or which alternatives meet those criterion the best.

(D. Keith Depo, pp. 177, l. 6 – 178, l. 14.)

The FS Addresses Hurricanes, Storms, Tidal Influences and Flooding

The County Attorney's July 15, 2014 letter claims that the FS reports are clearly biased because they do not "take into account the obvious impact of hurricanes, storms, tidal influence, and flooding . . . ." This is, of course, an absolute fabrication. The operative draft of the FS, the Draft Interim Final FS Report submitted to EPA in March 2014, addressed these issues throughout Section 5 in the detailed analysis of remedial alternatives and more specifically in Section 4 of Appendix B, the "Design Storm Evaluation" of the Hydrodynamic Modeling Summary. In addition, in response to EPA's comments, Anchor further addressed these issues in a submittal dated April 7, 2014. The fact that the County Attorney's July 15, 2014 letter makes such an outlandish claim demonstrates a lack of familiarity with the FS itself and undercuts the County Attorney's stated "concerns" regarding the credibility of the Superfund process being overseen by the EPA.

The So-Called "Global Plan" was Merely an Effort to Educate Stakeholders of the Merits of the Site Cap

The County Attorney also attempts to make much out of the so-called "global plan" by the Respondents to gain the support of the Community Action Committee "to view the [time critical removal action or "TCRA"] as part of the permanent remediation action at the Site." The following dialogue occurred in the deposition of MIMC's former (and now retired) Project Director, March Smith, regarding this issue:

> Q. (By County Attorney's Counsel) So it was Waste Management's position that in early 2011, it should try to influence the EPA to select the TCRA as part of the final remedy, even though the remedial investigation hadn't been finished, the risk assessment hadn't been finished, the feasibility study hadn't been finished, and there had been no proposed plan put together yet, correct?
>
> . . .
>
> A. Well, I wouldn't say influence EPA. I wouldn't use that term. It was a collaborative effort between the PRPs and EPA to come up with the final remedy, and we already had a remedy of sorts in place which we felt was quite effective. And so to build on that, enhance it if we needed to, was the optimum, I think, final use of the TCRA.
>
> . . .
>
> Q. When you say you're trying to build a consensus with EPA among others, it was your intent to try to influence the EPA

> to a particular remedy prior to going through the process that the EPA and the Superfund program uses to come up with a remedy.
>
> . . .
>
> A. Well, that's not what I'm saying at all. I'm talking about having technical discussions. Even before this date, we were, before EPA, with David Keith, explaining, I guess, the benefits of having a CDF [a confined disposal facility] for the facility, and I won't go into that because I'm not an expert on that. I'll leave that to the experts to expand on.

(M. Smith Depo., p. 103, l.8 – 104, l. 15.)

> Q. And you decided to implement that plan to try to talk the other stakeholders into it prior to the time that the remedial investigation was completed, prior to the time that the feasibility study was completed, or the risk analysis.
>
> . . .
>
> A. We never tried to talk anybody into it. We tried to educate them so they could make an intelligent decision, what was protective of human health and the environment. And as I mentioned before, if we needed to enhance it to make it a final remedy, then we would do so.

(M. Smith Depo., p. 141, l. 18 – 142, l. 9.)

The Respondents' desire to incorporate the work performed during the TCRA into the final remedy is consistent with the NCP and guidance published by EPA and the U.S. Army Corps of Engineers. The FS prepared by the Respondents includes detailed analyses not only of the TCRA cap but of six other alternative remedies for the EPA's evaluation. The Respondents believe that an enhancement of the TCRA cap best meets the NCP criteria based on the objective, scientific analysis conducted by Anchor and Integral. They recognize, however, that the final decision in that regard is one that rests with EPA.

Groundwater Has Not Been Impacted by Dioxin Originating From the Site

The groundwater investigation conducted by the Respondents and EPA at the Site has conclusively demonstrated that groundwater has not and is not being impacted by dioxins or other chemicals contained in waste disposed of at the Site. The results of this investigation were presented to the jury in the County Attorney's suit against the

Respondents for alleged releases of dioxins from the Site to waters of the State and the jury returned a verdict repudiating the County's claims.[2]

As explained previously in this letter, the groundwater study and all other Site technical studies were performed carefully in accordance with strict EPA protocols, guidance and oversight. More specifically, the following shows the process followed by the Respondents and EPA in studying the groundwater at the Site and evaluating whether dioxin at the Site may have impacted groundwater, as reported in the table of communications included with the monthly reports submitted by Respondents to EPA pursuant the UAO:

Groundwater Study North of Interstate-10 ("I-10")

Date	Communications Summary
10/1/2010	Anchor submitted the Draft Groundwater QAPP and Field Sampling Plan ("FSP").
11/8/2010	Anchor re-submitted the Revised Draft Groundwater Study Sampling and Analysis Plan (SAP).
11/22/2010	EPA provided comments on Anchor's Groundwater SAP.
12/6/2010	Anchor submitted responses to EPA's comments on the Groundwater SAP.
12/14/2010	EPA approved Anchor's responses to EPA's comments.
12/16/2010	Anchor submitted the Draft Final Groundwater Study SAP.
12/23/2010	EPA approved the Groundwater Study SAP.
1/13/2011	Anchor submitted the Final Groundwater Study SAP.
4/15/2011	Anchor provided Site groundwater data map and tables associated with implementation of the Groundwater FSP in the area north of I-10.
7/21/2011	Anchor submitted the Field Sampling Report: Groundwater Study.

[2] Respondents recognize that the County is pursuing an appeal from the adverse verdict.

Groundwater Study South of I-10

Date	Communications Summary
12/29/2011	Anchor submitted the Draft Groundwater SAP Addendum 1.
3/1/2012	EPA provided comments on the Draft Addendum 1 to the Groundwater Study SAP.
4/2/2012	Anchor submitted Groundwater SAP Addendum 1 to EPA.
4/11/2012	Anchor received approval on the Groundwater SAP Addendum 1 from EPA.
10/19/2012	Anchor provided EPA with boring logs on the monitoring wells installed in the area south of I-10, water table levels, and well construction information.
12/5/2012	Anchor submitted the Field Sampling Report Addendum 1 Groundwater Study.
4/4/2013	Anchor submitted the Draft Groundwater SAP Addendum 2 for the additional groundwater investigation.
4/23/2013	Anchor received conditional approval of the Groundwater SAP Addendum 2.
4/29/2013	Anchor submitted the Final Groundwater SAP Addendum 2 to the EPA.
8/27/2013	Anchor provided a summary to EPA of validated dioxin and furan data from groundwater samples collected in the area south of I-10.
4/29/2014	Anchor provided responses to questions received from EPA regarding shallow groundwater testing in the area south of Interstate 10.
5/2/2014	Anchor provided responses to questions received from EPA regarding shallow groundwater flow in the area south of Interstate 10.

At each step during this process, TCEQ, Harris County, and the Port of Houston Authority were afforded the opportunity to review the Respondents' submittals and provide comments to EPA. Further, detailed sampling data and laboratory reports were provided to the County as well as the other agency reviewers. Therefore, any suggestion

by the County Attorney that he has not had access to information about the groundwater investigation at the Site is false and deceptive.

With respect to the County Attorney's allegations regarding the locations of the groundwater monitoring wells at the Site north of I-10, the two wells located along the southern berm are cross gradient to the groundwater gradient. The monitoring well located along the central berm, however, was perfectly located to detect any dioxin associated with the Site present in groundwater beneath the Site. The County Attorney even alleged during the trial that the boring for this well showed that this well created an avenue of migration for dioxin from the Site down to groundwater because it was installed in an area in which the soil consists of sand. Despite this, no dioxin was detected in either the shallow or deep groundwater zone at this location. These results confirm the well-known scientific knowledge about dioxin – that it is hydrophobic (that is, nonsoluble) and tends to stay attached to the waste with which it is associated: Thus, at this Site, one would not expect dioxin to be mobile in the groundwater environment.

The lack of mobility of dioxins is further demonstrated by the groundwater investigation conducted south of I-10. In 2012, International Paper, at EPA's direction, installed and sampled groundwater wells in three locations and at depths at which paper mill waste and other wastes were thought to be located. Several dioxin and furan congeners were detected in these samples; however, they were not filtered and they likely contained particulate soil material based on field observations. In 2013, additional groundwater sampling was performed that included analysis of filtered and unfiltered samples. One groundwater well was installed outside of the area thought to contain paper mill and other wastes. Dioxins and furans were not detected in filtered samples from this well. Another well, from which both shallow and deep samples were taken, was located at the point of the highest concentrations of dioxin in soil that had been detected south of I-10. In filtered groundwater from the deep well, dioxins and furans were not detected. These additional results confirm that dioxin and furan detections in unfiltered groundwater samples from locations within the waste were the result of non-soluble particulate material associated with waste being incorporated into the water sample. Nothing in the results suggests that dioxins and furans have migrated from the waste in a dissolved state into groundwater. The same explanation applies to the sample result in SJMWS04 (which is located north of I-10), which was collected as an unfiltered sampled through a well point hammered directly into the waste in the western cell of the Northern Impoundment.

The County Attorney also claims that the Respondents did not achieve low enough detection limits to conclusively demonstrate that no dioxin associated with the Site is in the groundwater. This is not true. EPA established the detection limits for the groundwater study. Groundwater samples were analyzed using laboratory methods that achieved those detection limits. Based on the samples analyzed at the approved detection level, the groundwater study achieved the objective set out by EPA – to demonstrate that

dioxins and furans are not present in groundwater above the applicable Protective Concentration Levels.

The County Attorney is Incorrect in Claiming that No Data Exist to Assess Surface Water Concentrations Post-TCRA

Finally the County Attorney claims that no data exist to assess surface water concentrations after the cap was put in place. Again, the County Attorney is wrong. After the Respondents completed the groundwater study north of I-10, the Respondents retained a nationally-renowned expert – Dr. Danny Reible of the University of Texas – to design and conduct a study of the water located in the pore spaces between the rocks forming the cap at the Site and in surface water above the cap. The study included sampling in the surface water as well as the porewater. The study plan as well as the results were reviewed and approved by EPA. The study showed that no detectable levels of 2,3,7,8-tetrachlorodibenzo-p-dioxin were present in the porewater. 2,3,7,8-tetrachlorodibenzo furan was detected in three samples taken in one location (out of a total of 48 cap porewater samples), but at such low concentrations that its level could not be accurately quantified. Neither dioxins nor furans were detected in the overlying river surface water samples.

The Respondents and their consultants have worked in good faith with EPA over the last five and one-half years to ensure that the Site is properly investigated and remediated in accordance with CERCLA, the UAO, the Settlement Agreement and the Administrative Order on Consent (under which Respondents constructed the TCRA cap) and EPA guidance. The County Attorney's Letters are simply another effort by the County to disrupt the CERCLA process and further the County's litigation efforts.

Please let me know if you have any questions regarding this letter, or require further information regarding any of the issues addressed in it.

Sincerely,

Albert R. Axe, Jr.

ARA:mr

cc: Amy Salinas
John F. Cermak, Jr.
Sonja A. Inglin