Monthly Progress Report No. 40 February 2013/March 2013
Submitted March 15, 2013
San Jacinto River Waste Pits Superfund Site
USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS
Channelview, Texas

The Unilateral Administrative Order (UAO) for the Remedial Investigation/Feasibility Study (RI/FS) at the San Jacinto River Waste Pits Superfund Site (Site) in Channelview, Texas (USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS) was issued on November 20, 2009. The Respondents include International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC).

A. Summary of Work Performed – February 2013/March 2013

The Respondents, Anchor QEA, and Integral Consulting, completed work on the following tasks:

- Submitted Monthly Progress Report No. 39 to the United States Environmental Protection Agency (USEPA) on February 15, 2013.
- Continued work on the Draft Feasibility Study (Draft FS) for the Site.
- Received conditional approval of the Draft Final Baseline Ecological Risk Assessment (BERA) on February 26, 2013, and began working to address comments provided in the approval letter.
- On behalf of IP, discussed the groundwater investigation results for the area south of I-10 with USEPA, and began preparation of a Groundwater Sampling and Analysis Plan (SAP) Addendum 2 for USEPA review and approval.

B. Summary of Agency Communications

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

C. Summary of Sampling Results

No additional data have been collected or reported.

D. Problems, Delays, and Solutions

San Jacinto River Fleet Operations (SJRF)

Respondents continue to be concerned about the potential impacts of the SJRF operations in the immediate vicinity of the Site. Respondents have not received any information indicating that USEPA has taken action to change or prevent SJRF's activities

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in the area. Pursuant to an email dated February 9, 2012, USEPA's counsel forwarded to Respondents' counsel a copy of a Draft Sampling and Analysis Plan prepared for SJRF (SJRF Draft SAP). The SJRF Draft SAP purports to address "existing environmental impact that could be disturbed by SJRF's commercial operations" in the vicinity of the Site. The Respondents submitted correspondence dated March 8, 2012, to USEPA on the Respondents' concerns regarding potential impacts of SJRF's operations on the TCRA armored cap. The March 8, 2012 correspondence included the Respondents' comments on the SJRF Draft SAP. On May 1, 2012, the Respondents' counsel were informed by USEPA's counsel that the SJRF Draft SAP remained under review by USEPA. On May 16, 2012, USEPA's counsel provided Respondents' counsel with comments from the U.S. Department of Commerce National Oceanic and Atmospheric Administration (NOAA), the Texas Commission on Environmental Quality (TCEQ), and the Harris County Pollution Control Services Department regarding the SJRF Draft SAP. On June 12, 2012, USEPA forwarded Respondents' Project Coordinator a copy of USEPA's June 12, 2012 correspondence with the SJRF pursuant to which it transmitted to SJRF its comments on the SJRF Draft SAP. On September 17, 2012, Respondents received a revised sampling plan submitted to USEPA by the SJRF on June 18, 2012 (Revised SJRF Draft SAP). Based on the Respondents' review of the Revised SJRF Draft SAP, the Respondents continue to have the same concerns with the approach proposed by SJRF, as previously outlined to USEPA on March 8, 2012. On January 2, 2013, Respondents submitted their comments on the Revised SFRF Draft SAP, via email, to USEPA. The Respondents will continue to work with USEPA on this issue. Respondents will also continue to work with USEPA and SJRF, if necessary, should there be a need for access to the SJRF property for purposes of RI/FS activities. Those discussions would be based on prior communications in that regard, which are described in the monthly reports, submitted under the Administrative Settlement Agreement and Order on Consent for Removal Action for the Site.

Project Schedule

The attached November 2012 Revised RI/FS Schedule (November 2012 Schedule) was approved by USEPA on December 6, 2012. The Draft FS is due to USEPA on May 2, 2013 according to the current approved Schedule; however, that Schedule assumes timely review and submittal of comments on the Draft Remedial Investigation (Draft RI) Report

and related risk assessment documents by USEPA. Because the remedial alternatives to be considered for purposes of the Draft FS are dependent on information and conclusions presented in the Draft RI Report, it is not possible for the Respondents to develop, evaluate, and screen a final set of remedial alternatives for the Site without USEPA's review and approval of the Draft RI Report and related risk assessment documents. The following table summarizes important RI-related documents and interim milestones associated with the review and approval of those documents.

Document	Submittal Date	Milestone	Status
Draft Final BERA (for the area north of I-10 and the aquatic environment)	Submitted to USEPA on August 22, 2012	USEPA to approve on or before September 13, 2012	USEPA provided conditional approval of the Draft Final BERA on February 26, 2013. Respondents are addressing USEPA's comments to the Draft Final BERA.
Draft Baseline Human Health Risk Assessment	Submitted to USEPA on December 5, 2012	USEPA to provide comments on or before January 24, 2013	Agency comments pending
Draft RI Report	Submitted to USEPA on December 5, 2012	USEPA to provide comments on or before January 24, 2013	Agency comments pending

Delays by the USEPA in providing comments on and approval of these documents is affecting the schedule for the completion of the Draft FS Report. The Respondents will work with USEPA to revise the November 2012 Schedule as progress continues on the review and approval of RI-related documents.

E. Projected Work for Next 2 Reporting Periods – March 2013/April 2013

The Respondents, Anchor QEA, and Integral Consulting, expect to conduct the following tasks during the remainder of the month of March 2013 and through April 2013:

- Complete the review of USEPA's comments on the Draft Final BERA for the area north of I-10 and the aquatic environment and submit a Final BERA.
- Receive and begin review of any comments provided by USEPA on the Draft RI Report and Draft Baseline Human Health Risk Assessment.
- Continue work on the Draft FS for the Site.
- On behalf of IP, submit Groundwater SAP Addendum 2 for additional groundwater investigations in the area south of I-10.
- Continue to participate in and support USEPA on community awareness and outreach issues.
- Continue to work with USEPA, and SJRF if necessary, on issues associated with SJRF's potential impacts on the Site.

F. Schedule

The attached November 2012 Revised RI/FS Schedule was prepared in cooperation with USEPA to reflect revised due dates for deliverables and was approved by USEPA on December 6, 2012. As summarized in Section D above, the November 2012 Schedule will require further adjustments based on, among other things, the actual dates on which comments are received from, or approvals are given by, USEPA on the Respondents' submittals and the nature of those comments.

Prepared by:

David C. Keith

Project Coordinator

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
12/4/2009	Required Notifications pursuant to Paragraphs 51 and 75 of UOA	None	NA	Provided notice of intent to comply and "sufficient cause" defenses and identified Project Coordinator.
12/7/2009	Copies of Letters to McGinnes Heirs Regarding Site Access	None	NA	
12/10/2009	Draft Scoping Meeting Minutes	None	NA	
12/14/2009	Copy of Response from Big Star Barge & Boat Company Regarding Site Access	None	NA	
12/15/2009	Monthly Progress Report No. 1	None	NA	
12/18/2009	Status Report on Site Access	1/12/2010	Actions to date did not constitute "best efforts" to gain access.	Respondents and EPA spoke regarding the matter in further detail on 1/8/10.
12/21/2009	HASP	None	NA	
12/21/2009	Anchor QMP	None	NA	
12/21/2009	Integral QMP	None	NA	
1/7/2010	Request for comments regarding access agreement for Big Star Barge & Boat Company	None	NA	
1/11/2010	Proposed Draft AOC for time critical removal action	1/12/2010	Respondents' proposed AOC has been forwarded to headquarters and Philip Allen for comment. Time critical removal action requires imminent and substantial endangerment finding.	
1/12/2010	Copy of Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
1/12/2010	Notice of UAO Deficiency	None	Actions to date did not constitute "best efforts" to gain access.	
1/13/2010	Draft Sediment Sampling and Analysis Plan Minutes	None	NA	
1/13/2010	Draft Database and Data Exchange Minutes	None	NA	
1/15/2010	Monthly Progress Report No. 2	None	NA	
1/15/2010	Update Regarding Respondents' Efforts to Obtain Access Agreement, Response to Letter from Barbara Nann and Request for Extension	1/21/2010	Efforts to obtain Site access are "encouraging."	
1/20/2010	Correspondence from Port of Houston Authority regarding access	None	NA	
1/21/2010	Copies of Site Access Letter From Attorney for McGinnes Heirs	1/22/2010	EPA requested another copy of the letter	
1/21/2010	Correspondence with Port of Houston Authority Regarding revised fence alignment	None	NA	

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
1/22/2010	Copies of Site Access Letter From Attorney for McGinnes Heirs	None	NA	
1/25/2010	Copies of Letters Sent to Gary Gladfelter and Tanya Ammons Regarding Site Access	None	NA	
1/27/2010	Draft 1/20/10 Alignment Meeting Minutes	None	NA	
1/27/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA	
1/27/2010	EPA's response to Respondents' proposed AOC regarding Time Critical Removal Action	None	EPA will give Respondents additional time to respond as to whether Group wants to enter into AOC for Site stabilization.	
1/29/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
2/2/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA	
2/4/2010	Respondents' proposed changes/comments on proposed AOC for Time Critical Removal Action	3/5/2010	Awaiting finalization of action memo for site stabilization before making additional changes to the AOC for site stabilization.	
2/10/2010	Draft Memorandum San Jacinto River Waste Pits Superfund Site Time Critical Removal Action	Non	NA	
2/11/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
2/11/2010	Copy of executed Consent Form for Site Access from Big Star Barge & Boat Company	2/17/2010	EPA approved of the form and will await an access agreement allowing for the RI/FS to take place.	
2/15/2010	Monthly Progress Report No. 3	None	NA	
2/16/2010	Draft Sediment Sampling and Analysis Plan/QAPP	None	Comments received March 10, 2010	
2/16/2010	Correspondence to EPA regarding update to Respondents' efforts to obtain access to the site	None	NA	
2/17/2010	Submitted the Agency Review Draft of the Quality Assurance Project Plan and Field Sampling Plan for Sediment Sampling	Consolidated comments received on March 10, 2010	Follow up meeting conducted with EPA, TCEQ and Trustees on March 16 and comment/response table developed for submittal with Draft Final report	Draft Final document submitted on 4/9/2010.
2/18/2010	Sampling Plan for sediment sampling on February 17, 2010	2/19/2010	EPA will forward for review to EPA's financial assurance expert.	
2/18/2010	Correspondence from MIMC regarding financial assurance bond	2/19/2010	EPA will forward for review to EPA's financial assurance expert.	

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San Jacinto River Waste Pits Superfund Site

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2/19/2010	Copy of presentation regarding Short-Term Communications Plan	None	NA	
2/22/2010	Letter to Barbara Nann regarding MIMC's responsibility to provide access to the V.C. McGinnes, Trustee tract	None	NA	
3/18/2010	Draft Sediment Sampling and Analysis Plan Comment Review Meeting Minutes March 16, 2010, TCEQ, Austin Texas	None	NA	
4/7/2010	Draft Field Sampling Plan and Job Safety Analyses for the TCRA sampling	None	NA	This sampling was requested by EPA in an email on March 26, 2010.
4/9/2010	Submitted the Draft RI/FS Work Plan and SLERA	June 3, 1010	Comments received from EPA by email	
4/9/2010	Submitted the Draft Final of the Quality Assurance Project Plan and Field Sampling Plan for sediment sampling	None	NA	
4/15/2010	Submitted Monthly Progress Report No. 5 on April 15, 2010	None	NA	
		4/26/2010	Approval letter from EPA for implementation of the RI/FS Sediment QAPP/SAP.	Agency requested replacement pages for Final QAPP/SAP.
4/30/2010	Submitted replacement pages to EPA, TCEQ and the trustees for the Final SAP/QAPP on April 30, 2010	None	NA	
5/11/2010	Submitted the Draft Chemical Fate and Transport Modeling Study design and sampling and analysis plan addendum on May 11	None	NA	
5/14/2010	Submitted a Soil Sampling and Analysis Plan for the TxDOT right-of-way to TxDOT and EPA	None	NA	Submitted to TxDOT as part of effort to obtain access into the TxDOT right-of-way for RI/FS and TCRA activities.
5/17/2010	Submitted Monthly Progress Report No. 6 on May 17, 2010	None		
5/21/2010	Submitted revised TxDOT right-of-way sampling and analysis plan	None		Comments received from TxDOT on May 25, 2010.

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
5/25/2010	Submitted email outlining sediment sampling and analysis deviations	5/26/2010	EPA agreed to recommendations and asked that human health locations on west bank be reconsidered.	Human health locations on west bank moved with EPA concurrence in email on May 28, 2010.
5/27/2010	Submitted revised TxDOT right-of-way sampling and analysis plan	None		TxDOT approved the revised sampling and analysis plan on June 11, 2010.
5/28/2010	Submitted email summary of VOC data from sediment sampling	5/28/2010	EPA concurred that no further VOC analyses were required.	
6/7/2010	Response to 6/4/10 email from Barbara Nann regarding access for 3 soil samples in western impoundment	None		
6/11/2010	Submitted Draft Tissue Sampling and Analysis Plan and Draft Technical Memorandum on Bioaccumulation Modeling on June 11, 2010	None		
6/15/2010	Submitted Monthly Progress Report No. 7 on June 15, 2010	None		
6/25/2010	Submitted comments and responses on Draft RI/FS Work Plan	None		
7/9/2010	Submitted Revised Draft RI/FS Work Plan	7/12/2010 8/26/2010	Email from B. Nann forwarding edits to RI/FS work plan. Email from Steve Tzhone with additional comments concerning Site History and soil sampling in the area of former impoundments south of I-10.	
7/15/2010	Submitted Monthly Progress Report No. 8 on July 15, 2010	None		
7/27/2010	Provided EPA a draft response to comments on the Draft Fate and Transport Memorandum Review	8/12/2010	Email from S. Tzhone forwarding two additional comments on the Fate and Transport Modeling Memorandum	
8/16/2010	Submitted Monthly Progress Report No. 9 on August 16, 2010	None		

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Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
8/17/2010	Submitted revised response to comments on the Fate and Transport Sampling and Analysis Plan	8/31/2010 9/7/2010	Email from S. Tzhone approving the revised response to comments and authorizing submittal of the Final Draft document. Email from S. Tzhone providing comments from USGS on sampling and analysis plan and direction to incorporate comments as EPA comments by phone. Comments need to be addressed prior to implementing field work.	
8/18/2010	Submitted Draft Addendum to the Sampling and Analysis Plan (SAP): Sediment Study	8/23/2010	Email from S. Tzhone approving the addendum SAP and authorizing sampling in Cedar Bayou.	
8/18/2010	Submitted revised response to comments on the Bioaccumulation Modeling and Tissue Sampling and Analysis Plan	8/31/2010	Email from S. Tzhone approving the revised response to comments and authorizing submittal of the Final Draft documents.	
8/19/2010	Submitted Draft Meeting Minutes - Agency Comments on Tissue SAP and Technical Memorandum on Bioaccumulation Modeling	None		
9/3/2010	Submitted Draft Final RI/FS Work Plan	10/7/2010	Letter of deficiency from S. Tzhone requiring Respondents to incorporate EPA's Comment Number 4 (sampling of south impoundment) provided to the respondents on August 26, 2010, as part of the RI/FS.	Respondents have 14 days to comply from the date of the letter.
9/9/2010	Submitted letter to Steve Tzhone regarding Site Warning and Protective Measures	9/1/2010	Email from S. Tzhone approving the proposed scope of work for additional fencing and signs and requesting clarification and final design for impoundment signs and buoy placement.	

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/10/2010	Submitted letter to Steve Tzhone and Barbara Nann concerning MIMC's participation in soil sampling in the area of former impoundment south of I-10	10/8/2010	Letter to MIMC counsel from B. Nann expressing disagreement with MIMC's letter and reiterating position that south impoundment must be sampled.	
9/10/2010	Submitted the Draft Soil Sampling and Analysis Plan for the RI/FS	None		
9/10/2010	Submitted Draft Final Tissue SAP, and Draft Final Technical Memorandum on Bioaccumulation Modeling			
9/15/2010	Submitted Monthly Progress Report No. 10 on September 15, 2010	10/7/2010	Letter of deficiency from S. Tzhone requiring Respondents to submit all raw data with monthly progress reports.	Respondents have 14 days to comply from the date of the letter.
9/16/2010	Submitted letter outlining proposed buoy and warning signs at impoundments	9/16/2010	Email from S. Tzhone approving final design for signs and buoy system	
9/23/2010	Submitted an email with clarifications required for the final Sampling and Analysis Plan: Tissue Study on the following topics: Laboratory Certification, selection of tissue analytes, and a few editorial changes to the tables and text re: lipid analysis methods.	9/24/2010	Email from Steve Tzhone indicating that EPA agreed with the response to EPA's concerns about laboratory certification, and agreeing to the proposed edits. EPA approved the final Tissue SAP and Technical Memorandum on Bioaccumulation Modeling on September 24, 2010.	
9/28/2010	Submitted Final Sampling and Analysis Plan: Tissue Study and Final Technical Memorandum on Bioaccumulation Modeling on September 28, 2010.	9/29/2010	EPA approved of the Tissue SAP Addendum.	

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/30/2010	Submitted Draft TxDOT Right-Of-Way Data Report on September 30, 2010.	None		
10/1/2010	Submitted Draft Groundwater QAPP and FSP on October 1, 2010.	None		
		10/7/2010	Email from B. Nann regarding status of access efforts.	
		10/11/2010	Email from B. Nann encouraging diligent efforts on access.	
10/13/2010	Email to B. Nann regarding the status of access efforts and need for a conference call between TxDOT, EPA and respondents to discuss	10/14/2010	Email from B. Nann agreeing to conference call.	
10/15/2010	Submitted Monthly Progress Report No. 11 on October 15, 2010			
10/18/2010	IP Letter responding to NOD regarding south area investigation			
10/20/2010	Submitted revised monthly reports for June, July, August, and September 2010 and accompanying raw data on discs			
10/21/2010	MIMC letter responding to NOD regarding south area investigation			
10/21/2010	Joint letter responding to NOD regarding raw data			
10/21/2010	Submitted Draft Final RI/FS Work Plan	11/2/2010	Draft Final RI/FS Work Plan approval letter from S. Tzhone provided by email	
		10/25/2010	Email from B. Nann approving use of TxDOT right-of-way for gravel road	

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		10/29/2010	Received certified letter from B. Nann regarding UAO deliverables	
11/1/2010	Certified letter to B. Nann from IP counsel detailing Respondents' efforts to obtain Site Access Agreements with TxDOT and Big Star Barge and Boat			
		11/2/2010	Received certified letter from B. Nann regarding best efforts for obtaining Site Access	
		11/3/2010	Email from S. Tzhone to D. Keith expressing concerns with field sampling procedures used during the week of October 25, 2010	
11/5/2010	Email from D. Keith to S. Tzhone regarding compliance with UAO deliverable procedures and proposed future deliverable procedures	11/5/2010	Email from S. Tzhone to D. Keith concurring with proposed procedures	
		11/8/2010	Email from B. Nann concurring with proposed procedures	
11/8/2010	Email from D. Keith to S. Tzhone concerning revisions to field procedures to be used in the future.			
11/8/2010	Re-submitted Revised Draft Groundwater Study SAP	11/22/2010	Email from S. Tzhone with comments on Groundwater SAP	
11/8/2010	Re-submitted Draft Soil Sampling and Analysis Plan	11/22/2010	Email from S. Tzhone with comments on Soil SAP	Additional comments received from S. Tzhone on 11/30/2010
11/12/2010	Certified letter to B. Nann from Al Axe reiterating and detailing Respondents' efforts to obtain Site Access Agreements with TxDOT and Big Star Barge and Boat			

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
11/15/2010	Submitted Monthly Progress Report No. 12 on November 15, 2010			
11/30/2010	Submitted Draft Final Comment/Response Matrix of the Fate and Transport Modeling Memorandum	12/8/2010	Email from S. Tzhone approving the Draft Final Comment/Response matrix	
11/30/2010	Transferred preliminary Big Star soils data to USEPA as a mix of excel and PDF files via email, and then submitted the complete preliminary invalidated data to USEPA via email December 1, 2010			
12/6/2010	Submitted Draft Comment/Response Matrix for Groundwater SAP	12/14/2010	Email from S. Tzhone approving the Draft Final Comment/Response matrix	
12/9/2010	Submitted Draft Comment/Response Matrix for Soil SAP			
12/15/2010	Submitted Monthly Progress Report No. 13 on December 15, 2010			
12/16/2010	Submitted the Draft Final Groundwater Study Sampling and Analysis Plan on December 16, 2010	12/23/2010	Email and letter from S. Tzhone approving the Groundwater Study Sampling and Analysis Plan	Requested final copies be provided to remove "Draft" from "Draft Final" - implementation of field work approved
12/17/2010	Submitted the Draft Final Chemical Fate and Transport Modeling Memorandum December 17, 2010	1/10/2011	Email and letter from S. Tzhone approving the Chemical Fate and Transport Modeling Memorandum	Requested final copies be provided to remove "Draft" from "Draft Final"
12/17/2010	Submitted an Addendum to the Soil SAP to describe a soil investigation in the area South of I-10 on December 17, 2010	1/18/2011 2/3/11	Emailed letter from S. Tzhone providing comments to the Draft Addendum to the Soil SAP Additional comments from TCEQ on Draft Addendum to the Soil SAP received from S. Tzhone by email	Conference calls to discuss comments with agencies on January 25 and February 7
12/22/2010	Submitted the Draft Final Sampling and Analysis Plan: Soil Study on December 22, 2010	1/10/2011	Email and letter from S. Tzhone approving the Sampling and Analysis Plan: Soil Study	Requested final copies be provided to remove "Draft" from "Draft Final"
1/13/2011	Submitted Final Groundwater Study Sampling and Analysis Plan			
1/13/2011	Submitted Final Chemical Fate and Transport Modeling Memorandum			

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
1/14/2011	Submitted the Final Sampling and Analysis Plan: Soil Study			
1/14/2011	Submitted Monthly Progress Report No. 14			
1/24/2011	Email from D. Keith to S. Tzhone regarding schedule for soil sampling activities			
1/27/2011	Letter from IPs counsel submitted to USEPA regarding International Papers efforts to obtain access for the south area investigation			
1/27/2011	Provided USEPA a compilation of historical aerial photographs of the project area on the project web portal			
2/1/2011	Submitted a DVD containing all draft documents for the SJRWP RI/FS submitted to USEPA via the project portal through January 25, 2011			
2/11/2011	Submitted Draft Contaminants of Potential Concern Memorandum	3/10/2011	Received comments on Draft COPC Technical Memorandum	
2/14/2011	Submitted Draft Revised RI/FS Schedule	2/15/2011	Approval letter from EPA for revised RI/FS schedule	
2/15/2011	Submitted Monthly Progress Report No. 15			
2/15/2011	Submitted the Draft Bed Property Study Field Sampling Plan	3/3/2011	Received emailed comments from S. Tzhone on Draft Bed Property Study FSP	
2/15/2011	Submitted the Draft Bathymetry Survey Field Sampling Plan	3/3/2011	Received emailed comments from S. Tzhone on Draft Bathymetry Survey FSP	
2/22/2011	Submitted Draft Final Sampling and Analysis Play, Soil Study Addendum 1	3/4/2011	Approval letter from USEPA for Draft Final Sampling and Analysis Play, Soil Study Addendum 1	
3/2/2011	Submitted Draft Current Velocity Study Field Sampling Plan			
3/8/2011	Submitted Draft Comment Response Matrices for the Draft Bed Property Study and Draft Bathymetry Survey FSPs	3/9/2011	Phone conversation with Steve Tzhone indicated that responses were approved	
3/9/2011	Submitted Final Sampling and Analysis Plan, Soil Study Addendum 1			

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
3/11/2011	Phone call from J. Sampson (proxy for D. Keith) to S. Tzhone to report field observations of a petroleum odor and oily sheen on some subsurface soil samples from the south impoundment soil study area	3/11/2011	Received an email from S. Tzhone acknowledging the phone report, and with direction to: 1) proceed with sampling according to the approved Soil SAP Addendum 1, and 2) to provide a summary report of field observations when the sampling event is complete	
3/15/2011	Submitted Monthly Progress Report No. 16			
3/15/2011	Submitted the Draft Final Bed Property Study and the Draft Final Bathymetric Survey Field Sampling Plans	3/21/2011	Approval letter from USEPA for Draft Final Bed Property Study and the Draft Final Bathymetric Study FSP	
3/16/2011	Submitted the Draft Sedflume Study FSP, the Draft Radioisotope Coring Study FSP, and the Draft Upstream Sediment Load Study FSP	4/8/2011	Received emailed comments from S. Tzhone on the Draft Sedflume Study FSP, the Draft Radioisotope Coring Study FSP, and the Draft Upstream Sediment Load Study FSP	Conference call to discuss comments with agencies on April 15, 2011
3/16/2011	Submitted Field Report on south impoundment soil sampling			
3/18/2011	Submitted a letter to USEPA on behalf of International Paper regarding the completion of the south impoundment sampling			
3/25/2011	Submitted the Final Bed Property Study and the Final Bathymetric Survey Field Sampling Plans			
3/28/2011	Submitted the Draft Comment/Response Matrix for the Draft Currently Velocity Study Field Sampling Plan	4/6/2011	Received emailed comments from S. Tzhone with two additional comments on the Draft Current Velocity Study FSP	
		3/29/2011	Received emailed letter from S. Tzhone requesting Respondents participate in Residential Soil Sampling as part of USEPA's Community Engagement Initiative	Respondents provided USEPA their response to this request on April 15, 2011
3/30/2011	Submitted the Draft Comment/Response matrix with responses to USEPA comments on the COPC Technical Memorandum	4/1/2011	Conference call with USEPA to discuss comments	

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
4/7/2011	Submitted an email request for assistance in obtaining Quality Assurance Project Plan and laboratory validation packages for the TCEQ Total Maximum Load programs. These documents are necessary to meet all requirements of USEPA comments on the COPC Technical Memorandum			
4/8/2011	Submitted Revised Comment/Response Matrix for USEPA comments on the COPC Technical Memorandum	5/5/2011	Received approval letter from Carlos Sanchez for Gary Miller on the Draft COPC Technical Memorandum	
4/8/2011	Submitted the Draft Final Current Velocity Study FSP	5/3/2011	Received approval letter from Carlos Sanchez for Gary Miller on the Draft Final Current Velocity Study Field Sampling Plan	
4/14/2011	Submitted the Draft Comments/Responses matrices for the Draft Sedflume Study, Draft Radioisotope Coring Study, and the Draft Upstream Sediment Load Study Field Sampling Plans	4/15/2011	Conference call with USEPA to discuss comments	
4/15/2011	Submitted Monthly Progress Report No. 17			
4/15/2011	Provided USEPA and TCEQ Site groundwater data maps and tables associated with implementation of the north impoundment Groundwater Field Sampling Plan			
		4/19/2011	Received letter from Carlos Sanchez notifying Respondent's that USEPA has changed the designated EPA Project Coordinator under the UAO to M. Gary Miller effective April 19, 2011	
4/25/2011	Submitted Draft Final Upstream Sediment Load Field Sampling Plan	5/5/2011	Received phone request form Gary Miller to provide redline/strikeout version of Word document for EPA review.	Provided redline strikeout version of document for review by email from Teri Freitas on behalf of David Keith
4/28/2011	Submitted Draft Final Radioisotope Coring Study Field Sampling Plan	5/5/2011	Received approval letter from Carlos Sanchez on behalf of Gary Miller for the Draft Final Radioisotope Coring Study Field Sampling Plan	

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Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		4/29/2011	Received email from Gary Miller with three additional questions on the Draft Sedflume Study Field Sampling Plan	
5/5/2011	Submitted Draft Final Sedflume Field Sampling Plan	5/20/2011	Received approval letter from USEPA on the Draft Final Sedflume Study Field Sampling Plan	
5/9/2011	Submitted Final Current Velocity Study Field Sampling Plan			
5/9/2011	Submitted Final Radioisotope Coring Study Field Sampling Plan			
5/16/2011	Submitted Monthly Progress Report No. 18			
		5/18/2011	Received approval letter from USEPA on the Draft Final Upstream Sediment Load Field Sampling Plan	
		5/23/2011	Received letter from Gary Miller directing Respondents sample residential soils in the area	Respondents provided USEPA their response to this request on May 31, 2011
5/24/2011	Submitted Final Upstream Sediment Load Study Field Sampling Plan			
5/24/2011	Submitted Final Sedflume Field Sampling Plan			
5/25/2011	Submitted email request to USEPA for approval to begin monitoring well decommissioning	6/2/2011	Received email approval from Gary Miller to proceed with this work in accordance with the work plan	
5/27/2011	Submitted all Working Documents from the SJRWP Site Portal on DVD			
6/10/2011	Submitted Draft Soil Sampling and Analysis Plan Addendum 2	7/19/2011	Received draft approval and comments on the Draft Addendum 2 Sampling and Analysis Plan for Residential Soil Sampling	This is the sampling and analysis plan for residential soil sampling. The sampling and analysis plan was approved with modifications noted in the letter from USEPA
6/14/2011	Posted an updated Site database to the project web portal			
6/15/2011	Submitted Monthly Progress Report No. 19			
7/15/2011	Submitted Monthly Progress Report No. 20			

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
7/20/2011	Correspondence between MIMC counsel and USEPA regarding draft Preliminary Site Characterization Report and south impoundment issue			
7/20/2011	Correspondence between International Paper counsel and USEPA regarding draft Preliminary Site Characterization Report and south impoundment issue			
7/20/2011	Submitted the Draft Preliminary Site Characterization Report			
7/21/2011	Submitted Field Sampling Report: 2010 Sediment Study			
7/21/2011	Submitted Field Sampling Report: Tissue Study			
7/21/2011	Submitted Field Sampling Report: 2010-2011 Soil Study			
7/21/2011	Submitted Field Sampling Report: Groundwater Study			
7/22/2011	Submitted letter to USEPA regarding modeling schedule - due to drought in the Houston area	10/19/2011	Received letter from Gary Miller approving change in submittal date for the Chemical Fate and Transport Modeling Study to February 1, 2012	
7/25/2011	Submitted a Final Addendum 2 to the Soil Sampling and Analysis Plan for Residential Sampling			
7/25/2011	Provided USEPA draft language for an information sheet for residential sampling			
		7/29/2011	Received email from Steve Tzhone regarding potential CenterPoint Energy pipeline planned for construction within the project area	
8/1/2011	Email from Respondents' Project Coordinator to USEPA transmitting draft consent to access for residential sampling			
		8/2/2011	Received copy of email prepared by USEPA counsel regarding comments on draft consent to access for residential sampling	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		8/2/2011	Email from A. Foster to Respondents' counsel transmitting draft letters designating Respondents as EPA's representatives for Big Star access	
		8/3/2011	Email from A. Foster to Respondents' counsel transmitting copy of letter from EPA to San Jacinto River Fleet regarding its activities at the Site, expressing intent to pursue access from Big Star/San Jacinto River Fleet, and requesting summary of Respondents' problems in obtaining access from Big Star	
		8/3/2011	Email from A. Foster to Respondents' counsel regarding fact sheet associated with residential sampling	
8/3/2011	Submitted email to Gary Miller requesting change to approved Addendum 2 to the Soil Sampling and Analysis Plan. The requested revision involved a change from archiving deeper samples to including a second potential soil sampling mobilization and collection of deeper samples if required based on the results of the surface sampling. The revision was requested on the basis of a meeting between USEPA and Respondents on August 3, 2011 during which it was decided to limit the underground utility locate effort prior to mobilization for sampling so that sampling could occur sooner.	8/3/2011	Received email from Gary Miller approving proposed change to residential soil sampling and requesting a revised final soil sampling plan addendum	
8/3/2011	Email between MIMC counsel, on behalf of Respondents, and USEPA regarding revised version of consent to access for residential soil sampling			

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
8/3/2011	Email between MIMC counsel, on behalf of Respondents, and USEPA regarding revised version of consent to access for residential soil sampling and providing contact information for lessee of Big Star property and for Big Star counsel.			
8/4/2011	Submitted Revised Addendum 2 to the Soil Sampling and Analysis Plan for Residential Sampling			
8/8/2011	Submitted Memorandum to Gary Miller outlining data gap issues identified in the Draft Preliminary Site Characterization Report			A meeting was held with USEPA and other agencies in Austin on August 30, 2011 to discuss these issues. A revised memorandum was submitted on September 7, 2011 based on verbal comments received from USEPA following that meeting
		8/9/2011	Email from A. Foster to Respondents' counsel regarding revised letter of designation	
		8/10/2011	Email from J. Hernandez to Respondents' counsel regarding revised letter of designation	
		8/10/2011	Received a draft letter from USEPA describing additional study in the area of the impoundment south of I-10	
8/15/2011	Submitted Monthly Progress Report No. 21			
8/26/2011	Submitted preliminary unvalidated residential soil sampling data to USEPA			Followed electronic data deliverables from the analytical laboratory with an Excel summary spreadsheet on August 29, 2011
9/2/2011	Submitted validated residential soil sampling data to USEPA			

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/2/2011	Submitted email to Gary Miller and Valmichael Leos requesting clarification on a potential chemical monitoring program for the TCRA armored cap			In order to start the development of a sampling plan for this program, respondents need to know the following from USEPA: (1) Is the use of passive SPME acceptable to USEPA for the cap monitoring (2) Will this program be conducted as part of the TCRA AOC or RI/FS UAO program, and (3) Who will be the lead contact from USEPA for development and approval of the TCRA chemical monitoring program
9/7/2011	Submitted a revised memorandum outlining data gap issues identified in the Draft Preliminary Site Characterization Report to reflect changes requested by USEPA			
9/11/2011	Submitted a Draft Fact Sheet for the Site to USEPA for consideration			This fact sheet was requested by USEPA
9/15/2011	Submitted Monthly Report No. 22			
9/19/2011	Submitted Draft Addendum 1 to the Sediment Sampling and Analysis (SAP) for additional sediment sampling	10/3/2011	Received letter from Gary Miller providing conditional approval of the SAP	
9/19/2011	Submitted Draft Addendum 1 to the Tissue Sampling and Analysis Plan (SAP) for additional background catfish and crab sampling	10/3/2011	Received letter from Gary Miller providing conditional approval of the SAP	
9/21/2011	Submitted letter to USEPA regarding ADCP servicing issue and San Jacinto River Fleet Operations	10/19/2011	Received letter from Gary Miller to continue deployment of the acoustic doppler profiler and the re-deployment of the suspended sediment sampler when water is again flowing over the Lake Houston dam	
9/22/2011	Submitted Attachment B2 (Toxicity of Dioxin-Like Compounds to Invertebrates, Fish, Reptiles, Birds and Mammals) in Appendix B of the Final RI/FS Work Plan			
10/4/2011	Submitted Addendum 1 to the Sediment Sampling and Analysis (SAP) for additional sediment sampling			Addressed conditions outlined in conditional approval letter received on 10/3/2011
10/5/2011	Submitted Addendum 1 to the Tissue Sampling and Analysis Plan (SAP) for additional background catfish and crab sampling			Addressed conditions outlined in conditional approval letter received on 10/3/2011
10/12/2011	Submitted Draft Dioxin Treatability Study Literature Review			

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
10/14/2011	Submitted letter to USEPA regarding Field Studies Issues	11/10/2011	Received an email from Gary Miller to David Keith stating that after discussions with partner agencies, the request to remove the ADCP and discontinue data collection for the current velocity and upstream sediment load studies is approved	If a high flow event occurs, or appears likely at any time within the next two months, then the ADCP shall be re-installed and data collection for the current velocity and upstream sediment load studies resumed. Based on the timing of any such high flow event during this time, a request for extension of the submittal date for the Fate and Transport Model Study will be considered to allow sufficient time for inclusion and evaluation of any new velocity and sediment load data
10/17/2011	Submitted Monthly Report No. 23			
		10/19/2011	Received letter from Gary Miller approving change in submittal date for the Chemical Fate and Transport Modeling Study to February 1, 2012	
10/28/2011	Email from Jennifer Sampson with Integral Consulting to Gary Miller requesting approval to include three additional samples with percent fines of 81.5, 82.3, and 83.2 be added to seven other samples from the Addendum 1 to the Sediment Sampling and Analysis (SAP) for analysis of dioxins and furans and organic carbon	11/1/2011	Email approval from Gary Miller to Jennifer Sampson for the analysis of additional samples as requested	
11/15/2011	Submitted Monthly Report No. 24			
11/16/2011	Prepared and submitted a meeting summary for the proposed armored cap monitoring program to USEPA			
		11/16/2011	Received and reviewed draft comments from USEPA on the draft Preliminary Site Characterization Report (PSCR)	
		11/23/2011	Received and reviewed revised draft comments from USEPA on the draft PSCR	
		11/29/2011	Received and reviewed a draft letter from USEPA regarding comments and directives for additional sampling on the southern impoundment area on behalf of IP	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
11/29/2011	Email from David Keith to Mr. Miller forwarding technical literature on the use of sediment traps			
		12/1/2011	Received and reviewed a fingerprint analysis on the southern impoundment area from Mr. Miller on behalf of IP. The analysis was prepared by Dr. Linda Broach with TCEQ	
12/5/2011	Provided copies of residential soil sampling consent forms to Mr. Miller			
12/6/2011	Provided Mr. Miller a table pairing residential soil sample identification numbers and physical street addresses			
		12/9/2011	Received a letter from Mr. Miller providing conditional approval of the PSCR. The letter further instructed the Respondents to provide a comment response matrix to USEPA for approval, followed by submittal of the Final PSCR	
		12/9/2011	Received a letter from Mr. Miller providing final comments and directives for additional sampling in the southern impoundment area on behalf of IP	
12/13/2011	Prepared and submitted a meeting summary for the Fate and Transport Modeling Workshop #2 to USEPA			
12/15/2011	Submitted Monthly Report No. 25			
12/29/2011	On behalf of International Paper, submitted Draft Soil SAP Addendum 3, Draft Sediment SAP Addendum 2, and Draft Groundwater SAP Addendum 1			
1/3/2012	Submitted a draft matrix summarizing the Respondents proposed revisions to the PSCR to address USEPA comments received on December 8, 2011	1/5/2012	Received email from Mr. Miller approving the proposed revisions to the PSCR	Revisions will be incorporated into the Final PSCR

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		1/5/2012	Received approval in a phone call from Mr. Miller on the conceptual TCRA chemical monitoring approach and was directed to develop a SAP for that program	
1/10/2012	Provided email notification to Mr. Miller that the project database had been updated and posted the project web portal			
1/17/2012	Submitted Monthly Report No. 26			
1/19/2012	Submitted the Draft Alternatives Memorandum, Draft Toxicological and Epidemiological Studies Memorandum, and Draft Exposure Assessment Memorandum			
2/1/2012	Submitted Chemical Fate and Transport Modeling Report on February 1, 2012			
		2/9/2012	Email from J. Hernandez to Respondents' counsel forwarding draft pre-construction baseline site assessment work plan for San Jacinto River Fleet project ("SJRF Draft SAP")	
2/14/2012	Submitted a letter to USEPA regarding revisions to the RI/FS schedule			
		2/14/2012	Email from J. Hernandez to Respondents' counsel forwarding copy of USEPA letter to San Jacinto River Fleet dated 12/1/2012	
		2/15/2012	Email from J. Hernandez to Respondents' counsel regarding deadline for comments on the SJRF Draft SAP	
2/15/2012	Submitted Monthly Report No. 27			
2/28/2012	Submitted Final Preliminary Site Characterization Report on February 28, 2012			

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		3/1/2012	Received comments from Mr. Miller on: 1) Draft Addendum 1 to the Groundwater Study Sampling and Analysis Plan for Additional Sampling South of Interstate Highway 10	
			2) Draft Addendum 2 to the Sediment Sampling and Analysis Plan for Additional Sampling South of Interstate Highway 10	
			3) Draft Addendum 3 to the Soil Sampling and Analysis Plan for Additional Sampling South of Interstate Highway 10	
3/8/2012	Submitted a letter to USEPA regarding the Respondents' concerns about the San Jacinto River Fleet operations, and provided comments on the Draft SAP			
3/15/2012	Submitted Draft Baseline Ecological Risk Assessment on March 15, 2012			
3/15/2012	Submitted Monthly Report No. 28			
4/2/2012	Submitted Soil SAP Addendum 3, Sediment SAP Addendum 2, and Groundwater SAP Addendum 1 to USEPA	4/11/2012	Received approval on the Soil Sampling and Analysis Plan (SAP) Addendum 3, Sediment SAP Addendum 2, and Groundwater SAP Addendum 1 from USEPA by letter and email from Gary Miller	
4/5/2012	Submitted cover letter and Revised Schedule for RI/FS deliverables to USEPA	4/11/2012	Received approval on the Revised RI/FS Schedule from USEPA by email from Gary Miller	
4/16/2012	Submitted Monthly Report No. 29			
4/16/2012	Submitted Draft Sampling and Analysis Plan (SAP) for the TCRA Cap Porewater Assessment	5/9/2012	Received approval with modifications on the Draft SAP: Time Critical Removal Action (TCRA) Cap Porewater Assessment on May 9, 2012	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		4/24/2012	Received comments from Gary Miller on the Draft Exposure Assessment Memorandum (EA) and the Draft Toxicological and Epidemiological Studies (TES) Memorandum	Received clarification on comments regarding the EA and TES Memos from USEPA by email to the Respondents' Project Coordinator on May 10, 2012
		5/1/2012	Email from J. Hernandez to Respondents' counsel regarding SJRF Draft SAP currently under USEPA review	
		5/8/2012	Received comments from USEPA on the Draft Chemical Fate and Transport Modeling Study	
5/15/2012	Submitted Monthly Report No. 30			
		5/16/2012	Emails from J. Hernandez to Respondents' counsel providing comments to the SJRF Draft SAP from NOAA, TCEQ, and the Harris County Pollution Control Services	
5/22/2012	Submitted Sampling and Analysis Plan (SAP) for the TCRA Cap Porewater Assessment			
5/22/2012	Submitted Final Exposure Assessment Memorandum and Final Toxilogical and Epidemiological Studies Memorandum to USEPA			
		6/6/2012	Received additional comments from USEPA on the Draft Chemical Fate and Transport Modeling Study	
		6/12/2012	Received copy of 6/12/2012 correspondence from USEPA to SJRF providing USEPA's comments to the SJRF Draft SAP	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
6/13/2012	Provided USEPA a letter regarding the installation of two additional Performance Reference Compound samplers in the TCRA Cap Porewater Assessment implementation to provide an intermediate check on equilibrium conditions between the samplers and cap porewater on June 13, 2012			
6/15/2012	Provided USEPA a letter and updated RI/FS schedule on June 15, 2012			
6/15/2012	Submitted Monthly Report No. 31			
		6/22/2012	Received comments from USEPA on the Draft Baseline Ecological Risk Assessment	
7/10/2012	Provided USEPA a letter outlining a process to resolve comments from USEPA on the draft BERA, and requested the draft final BERA be submitted on August 22, 2012	7/17/2012	Received approval letter from G. Miller	
7/16/2012	Submitted Monthly Report No. 32			
7/18/2012	Submitted Draft Final Chemical Fate and Transport Modeling Study	9/13/2012	Received approval of the Draft Final Chemical Fate & Transport on September 13, 2012, with requirements to address additional comments for the final report in the approval letter	Received clarification on modifications requested by USEPA on the Draft Final Chemical Fate and Transport Modeling Report by email from Gary Miller on September 25, 2012, conducted additional analyses, and prepared and submitted the final report to USEPA on October 11, 2012. Mr. Miller agreed to extending the submittal due date on the Final Fate and Transport Modeling Report to allow time for the Respondents to conduct additional evaluations requested by EPA in the approval letter in a phone call with the Respondents Project Coordinator on October 3, 2012.
		8/13/2012	Received comments from USEPA on the Draft Remedial Alternatives Memorandum	
8/15/2012	Provided email notification to Mr. Miller that the project database had been updated and posted to the project web portal			
8/15/2012	Submitted Monthly Report No. 33			

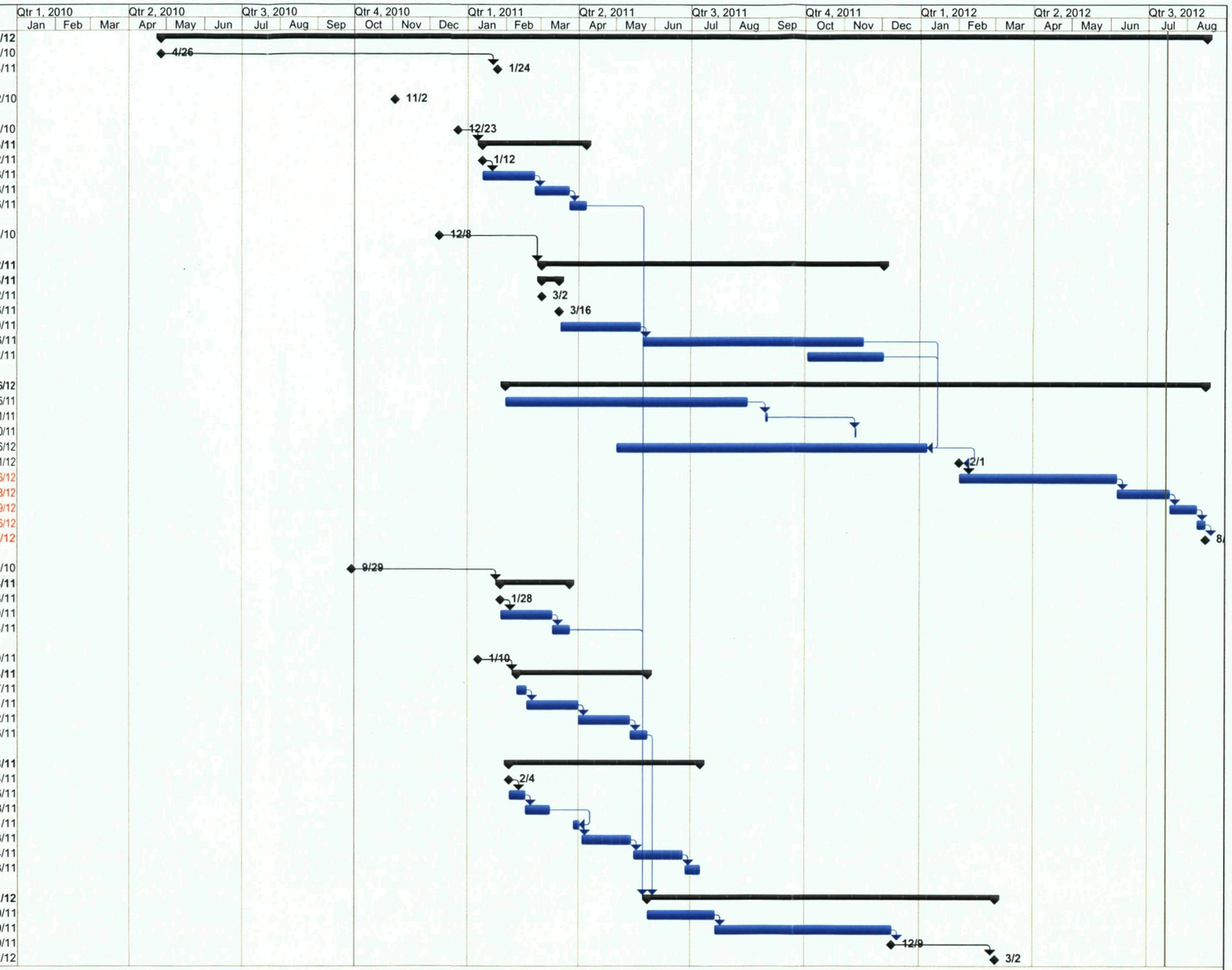
Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
8/22/2012	Submitted Draft Final Baseline Ecological Risk Assessment	2/26/2013	Received conditional approval of Draft Final Baseline Ecological Risk Assessment	The approval letter provided by USEPA was date stamped February 7, 2013; however it was not transmitted to the Respondents until February 26, 2013. The approval letter included comments and directives from USEPA that require additional revisions be made in the final report.
9/11/2012	Submitted Draft Final Remedial Alternative Memorandum	11/14/2012	Received approval of the Draft Final Remedial Alternatives Memorandum on November 14, 2012, with requirements to address additional comments for the report in the approval letter	
9/17/2012	Submitted Monthly Report No. 34			
		10/4/2012	Received approval letter from G. Miller for TES Memorandum	
		10/4/2012	Received approval letter from G. Miller for the EA Memorandum	
10/4/2012	Provided email notification to Mr. Miller that the project database had been updated and posted to the project web portal			Included validated Armored Cap Porewater Assessment Data
10/11/2012	Submitted the Final Chemical Fate and Transport Modeling Report to USEPA			
10/15/2012	Submitted Monthly Report No. 35			
10/19/2012	On behalf of IP, provided USEPA with boring logs on the three South Impoundment monitoring wells, water table levels, and well construction information			
10/30/2012	Provided USEPA a draft summary presentation of the armored cap porewater monitoring evaluation and results to use in a planned community meeting			
11/14/2012	Provided USEPA a letter confirming that delivery of the draft RI Report and BHHRA on December 5, 2012 was approved, and providing an updated RI/FS schedule reflecting that change, and other associated changes in the Feasibility Study schedule that were made to maintain the overall project schedule	12/6/2012	Received email approval from Gary Miller that the November 2012 RI/FS schedule was approved as presented	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		11/14/2012	Received approval of the Draft Final Remedial Alternatives Memorandum on November 14, 2012, with requirements to address additional comments for the report in the approval letter	
11/15/2012	Submitted Monthly Report No. 36			
12/3/2012	Submitted Final Remedial Alternatives Memorandum to USEPA			
12/5/2012	Submitted Draft Remedial Investigation Report and Draft Baseline Human Health Risk Assessment to USEPA. Also submitted five field sampling reports including: • Field Sampling Report: 2011 – 2012 Sediment Study • Field Sampling Report: 2011 Tissue Study • Field Sampling Report: 2012 Soil Study • Field Sampling Report: TCRA Cap Porewater Assessment • Field Sampling Report Addendum 1 Groundwater Study			
12/17/2012	Submitted Monthly Report No. 37			
1/2/2013	Respondents submitted their comments on the Revised San Jacinto River Fleet Draft Sampling and Analysis Plan, via email, to USEPA			
1/15/2013	Submitted Monthly Report No. 38			
2/15/2013	Submitted Monthly Report No. 39			
		2/26/2013	Received conditional approval of Draft Final Baseline Ecological Risk Assessment	The approval letter provided by USEPA was date stamped February 7, 2013; however it was not transmitted to the Respondents until February 26, 2013. The approval letter included comments and directives from USEPA that require additional revisions be made in the final report.

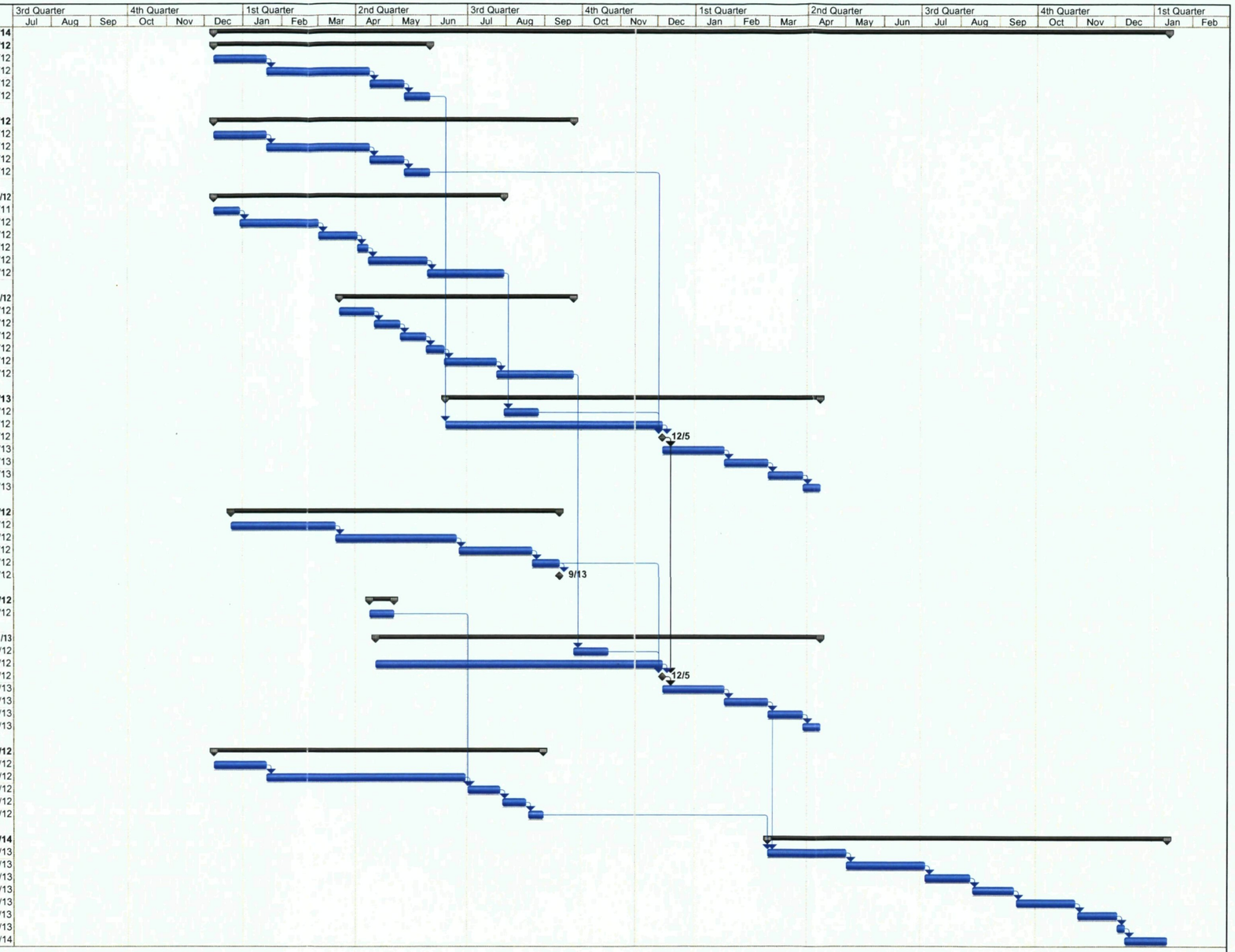
ID	Task Name	Duration	Start	Finish
1	**Preliminary Site Characterization Report Studies and Preparation**	**604 days**	**Mon 4/26/10**	**Thu 8/16/12**
2	**EPA Approval San Jacinto Sediment Sampling and Analysis Plan**	0 days	Mon 4/26/10	Mon 4/26/10
3	**Completed Field Implementation, Data Validation and Data Management**	0 days	Mon 1/24/11	Mon 1/24/11
4				
5	**EPA Approval of RI/FS Work Plan**	0 days	Tue 11/2/10	Tue 11/2/10
6				
7	**EPA Approval of Groundwater QAPP/FSP**	0 days	Thu 12/23/10	Thu 12/23/10
8	**Groundwater Field Sampling and Analysis**	**60 days**	**Wed 1/12/11**	**Wed 4/6/11**
9	Well Installation and Sampling Completed	0 days	Wed 1/12/11	Wed 1/12/11
10	Laboratory Analysis	30 days	Thu 1/13/11	Wed 2/23/11
11	Data Validation	20 days	Thu 2/24/11	Wed 3/23/11
12	Data Management	10 days	Thu 3/24/11	Wed 4/6/11
13				
14	**EPA Approval of Tech. Memo. On Fate&Transport Modeling Memo and QAPP**	0 days	Wed 12/8/10	Wed 12/8/10
15				
16	**Field Sampling, F&T Study**	**198 days**	**Wed 3/2/11**	**Fri 12/2/11**
17	**Submittal of FSPs**	**10 days**	**Wed 3/2/11**	**Wed 3/16/11**
18	Bed Property Study, Bathymetric Survey, Current Velocity Study	0 days	Wed 3/2/11	Wed 3/2/11
19	Radio Isotope Coring, SedFlume Study, Upstream Sediment Load Study	0 days	Wed 3/16/11	Wed 3/16/11
20	Agency Review and Response	47 days	Thu 3/17/11	Fri 5/20/11
21	Field Studies	128 days	Mon 5/23/11	Wed 11/16/11
22	Data Validation and Data Management	45 days	Mon 10/3/11	Fri 12/2/11
23				
24	**F&T Model Development, Calibration and Application**	**404 days**	**Tue 2/1/11**	**Thu 8/16/12**
25	F&T Model Development	140 days	Tue 2/1/11	Mon 8/15/11
26	Agency Coordination Workshop #1	2 days	Tue 8/30/11	Wed 8/31/11
27	Agency Coordiantion Workshop #2	1 day	Thu 11/10/11	Thu 11/10/11
28	F&T Model Calibration/Validation	180 days	Mon 5/2/11	Fri 1/6/12
29	Submit Draft F&T Modeling Report	0 days	Wed 2/1/12	Wed 2/1/12
30	Agency Review	91 days	Thu 2/2/12	Wed 6/6/12
31	Prepare Draft Final	30 days	Thu 6/7/12	Wed 7/18/12
32	Agency Review and Approval of Draft Final	16 days	Thu 7/19/12	Thu 8/9/12
33	Prepare Final Report	5 days	Fri 8/10/12	Thu 8/16/12
34	Submit Final Report	0 days	Thu 8/16/12	Thu 8/16/12
35				
36	**EPA Approval of Tech Memo on Bioaccumulation & QAPP/FSP**	0 days	Wed 9/29/10	Wed 9/29/10
37	**Field Sampling Tissue**	**40 days**	**Fri 1/28/11**	**Thu 3/24/11**
38	Field Study and Laboratory Analysis Completed	0 days	Fri 1/28/11	Fri 1/28/11
39	Data Validation	30 days	Fri 1/28/11	Thu 3/10/11
40	Data Management	10 days	Fri 3/11/11	Thu 3/24/11
41				
42	**EPA Approval of Soil QAPP/FSP**	0 days	Mon 1/10/11	Mon 1/10/11
43	Soil Field Sampling and Analysis, North of I-10	**76 days**	**Thu 2/10/11**	**Thu 5/26/11**
44	Mobilization and Field Study	6 days	Thu 2/10/11	Thu 2/17/11
45	Laboratory Analysis	30 days	Fri 2/18/11	Thu 3/31/11
46	Data Validation	30 days	Fri 4/1/11	Thu 5/12/11
47	Data Management	10 days	Fri 5/13/11	Thu 5/26/11
48				
49	**Soil SAP Addendum, South of I-10**	**111 days**	**Fri 2/4/11**	**Fri 7/8/11**
50	Agency Meeting	0 days	Fri 2/4/11	Fri 2/4/11
51	Document Revisions	9 days	Fri 2/4/11	Wed 2/16/11
52	Agency Review and Approval	14 days	Thu 2/17/11	Tue 3/8/11
53	Soil Sampling South of I-10 (assuming access issues are resolved)	5 days	Mon 3/28/11	Fri 4/1/11
54	Laboratory Analysis	30 days	Mon 4/4/11	Fri 5/13/11
55	Data Validation	30 days	Mon 5/16/11	Fri 6/24/11
56	Data Management	10 days	Mon 6/27/11	Fri 7/8/11
57				
58	**Preliminary Site Characterization Report**	**200 days**	**Fri 5/27/11**	**Fri 3/2/12**
59	Draft PSC Report	39 days	Fri 5/27/11	Wed 7/20/11
60	Agency Review	102 days	Thu 7/21/11	Fri 12/9/11
61	EPA Conditional Approval of PSC Report	0 days	Fri 12/9/11	Fri 12/9/11
62	Final PSC Report Submittal	0 days	Fri 3/2/12	Fri 3/2/12



Project: Draft San Jac Schedule Pre-P
Date: Mon 7/16/12

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	

ID	Task Name	Duration	Start	Finish
1	**Post Site Characterization Report Deliverables**	**547 days**	**Fri 12/9/11**	**Mon 1/13/14**
2	**Exposure Assessment (EA) Memorandum**	**125 days**	**Fri 12/9/11**	**Thu 5/31/12**
3	Submit Draft of EA Memo	30 days	Fri 12/9/11	Thu 1/19/12
4	Agency Review	60 days	Fri 1/20/12	Thu 4/12/12
5	Final EA Memorandum Submitted	20 days	Fri 4/13/12	Thu 5/10/12
6	EPA Approval of EA Memorandum	15 days	Fri 5/11/12	Thu 5/31/12
7				
8	**Toxicological and Epidemiological Studies (TES) Memorandum**	**207 days**	**Fri 12/9/11**	**Mon 9/24/12**
9	Submit Draft of TES Memo	30 days	Fri 12/9/11	Thu 1/19/12
10	Agency Review	60 days	Fri 1/20/12	Thu 4/12/12
11	Final TES Memorandum Submitted	20 days	Fri 4/13/12	Thu 5/10/12
12	EPA Approval of TES Memorandum	15 days	Fri 5/11/12	Thu 5/31/12
13				
14	**South Impoundment Investigation Phase II**	**167 days**	**Fri 12/9/11**	**Mon 7/30/12**
15	Submittal of Draft Soil, GW and Sediment SAP Addenda	15 days	Fri 12/9/11	Thu 12/29/11
16	Agency Review and comments on SAP Addenda	45 days	Fri 12/30/11	Thu 3/1/12
17	Prepare Draft Final SAP Addenda	22 days	Fri 3/2/12	Mon 4/2/12
18	EPA Review and Approval of SAP Addenda	7 days	Tue 4/3/12	Wed 4/11/12
19	Field Sampling Phase II	34 days	Thu 4/12/12	Tue 5/29/12
20	Sample analysis, data validation and data management	44 days	Wed 5/30/12	Mon 7/30/12
21				
22	**Cap Porewater Study**	**136 days**	**Mon 3/19/12**	**Mon 9/24/12**
23	Submitttal of Draft Cap Porewater Study SAP/FSP	21 days	Mon 3/19/12	Mon 4/16/12
24	Agency Review and comments on SAP/FSP	15 days	Tue 4/17/12	Mon 5/7/12
25	Prepare Draft Final SAP/FSP	15 days	Tue 5/8/12	Mon 5/28/12
26	EPA Review and Approval of SAP/FSP Addenda	11 days	Tue 5/29/12	Tue 6/12/12
27	Field Sampling	30 days	Wed 6/13/12	Tue 7/24/12
28	Sample analysis, data validation and data management	44 days	Wed 7/25/12	Mon 9/24/12
29				
30	**Baseline Human Health Risk Assessment BHHRA Report**	**216 days**	**Thu 6/14/12**	**Thu 4/11/13**
31	Evaluate South Impoundment Data	20 days	Tue 7/31/12	Mon 8/27/12
32	Prepare Draft of BHHRA Report	125 days	Thu 6/14/12	Wed 12/5/12
33	Submit Draft BHHRA Report	0 days	Wed 12/5/12	Wed 12/5/12
34	Agency Review	36 days	Thu 12/6/12	Thu 1/24/13
35	Draft Final BHHRA Submitted	25 days	Fri 1/25/13	Thu 2/28/13
36	EPA Review and Approval of BHHRA Report	20 days	Fri 3/1/13	Thu 3/28/13
37	Final BHHRA Submittal	10 days	Fri 3/29/13	Thu 4/11/13
38				
39	**Baseline Ecological Risk Assessment (BERA) Report**	**190 days**	**Fri 12/23/11**	**Thu 9/13/12**
40	Submit Draft of BERA Report	60 days	Fri 12/23/11	Thu 3/15/12
41	Agency Review	71 days	Fri 3/16/12	Fri 6/22/12
42	Draft Final BERA Submitted	43 days	Mon 6/25/12	Wed 8/22/12
43	EPA Approval of BERA Memorandum	16 days	Thu 8/23/12	Thu 9/13/12
44	Final BERA Submittal	0 days	Thu 9/13/12	Thu 9/13/12
45				
46	**Treatability Studies (TS)**	**14 days**	**Fri 4/13/12**	**Wed 5/2/12**
47	To be determined	14 days	Fri 4/13/12	Wed 5/2/12
48				
49	**Remedial Investigation (RI) Report**	**257 days**	**Wed 4/18/12**	**Thu 4/11/13**
50	Evaluate Armored Cap Data for Report	20 days	Tue 9/25/12	Mon 10/22/12
51	Prepare Draft of RI Report	166 days	Wed 4/18/12	Wed 12/5/12
52	Submit Draft RI Report	0 days	Wed 12/5/12	Wed 12/5/12
53	Agency Review	36 days	Thu 12/6/12	Thu 1/24/13
54	Draft Final Submittal of RI Report	25 days	Fri 1/25/13	Thu 2/28/13
55	EPA Review, RI Report Presentation, & EPA Approval	20 days	Fri 3/1/13	Thu 3/28/13
56	Final RI Report Submittal	10 days	Fri 3/29/13	Thu 4/11/13
57				
58	**Remedial Alternatives Memorandum**	**191 days**	**Fri 12/9/11**	**Fri 8/31/12**
59	Submit Draft of RA Memorandum	30 days	Fri 12/9/11	Thu 1/19/12
60	Agency Review	116 days	Fri 1/20/12	Fri 6/29/12
61	Prepare Final Draft RA Report	20 days	Mon 7/2/12	Fri 7/27/12
62	EPA Approval of Final RA Report	15 days	Mon 7/30/12	Fri 8/17/12
63	Submit Final RA Report	10 days	Mon 8/20/12	Fri 8/31/12
64				
65	**Feasibility Study (FS) Report**	**227 days**	**Fri 3/1/13**	**Mon 1/13/14**
66	Submit Draft Interim Final FS Report	45 days	Fri 3/1/13	Thu 5/2/13
67	Agency Review	45 days	Fri 5/3/13	Thu 7/4/13
68	Final Interim FS Report	26 days	Fri 7/5/13	Fri 8/9/13
69	Submit Final FS Report	25 days	Mon 8/12/13	Fri 9/13/13
70	EPA Prepares "Proposed Plan"	35 days	Mon 9/16/13	Fri 11/1/13
71	EPA Accepts Public Comment on Proposed Plan	23 days	Mon 11/4/13	Wed 12/4/13
72	EPA Provides Comments to Respondents	4 days	Thu 12/5/13	Tue 12/10/13
73	Prepare Final FS Report	24 days	Wed 12/11/13	Mon 1/13/14



Project: EPAs UAO-RI Schedule after
Date: Tue 11/13/12

Task | Split | Milestone | Summary | Project Summary | External Tasks | External Milestone | Progress | Deadline