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MEMORANDUM

To:	Valmichael Leos and Barbara Nann U.S. Environmental Protection Agency	**Date:**	February 15, 2013
From:	John Laplante, John Verduin, Wendell Mears, and David Keith, Anchor QEA	**Project:**	090557-01
Cc:	Gary Miller, USEPA Philip Slowiak, IP March Smith, MIMC David Moreira, MIMC		
Re:	Post-TCRA Quarterly Inspection Report - January 2013 Inspection		

Introduction

This document reports the results of the January 2013 quarterly inspection of the armored cap cover, fencing, and signage installed for the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (TCRA Site).

Background

The TCRA was implemented by International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) under an Administrative Settlement Agreement and Order on Consent (AOC) with the U.S. Environmental Protection Agency (USEPA) – Docket No. 06-12-10, effective May 17, 2010. A full description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Revised Draft Final Removal Action Completion Report[1] (RACR; Anchor QEA 2012)

[1] David Keith, the Respondents' the Project Coordinator, received a RACR (in the form issued by USEPA) from Valmichael Leos via email on August 15, 2012; the appendices to the RACR including the OMM Plan, was not provided to Dr. Keith as part of the document. In the OMM Plan had been previously approved by USEPA (in an email from Mr. Leos dated January 18, 2012), it is assumed to remain unchanged. Respondents reserve all rights related to the changes made by USEPA to the Revised Draft Final RACR, submitted by Respondents to USEPA on March 9, 2012.

The inspection summarized in this report was conducted in accordance with the schedule established in the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2012)[2]. The OMM Plan specifies the timing, pertinent items, tolerances, and procedures for inspection, maintenance, and repair of the armored cap protective cover, fencing, and signage installed for the TCRA Site (Figure 1).

Monitoring

The purpose of this report is to document the January 2013 quarterly inspection of the armored cap cover, fencing, and signage installed as part of the TCRA, as well as corrective actions taken (if any), following the inspection. The inspection, which commenced on January 11, 2013 and was completed on January 18, 2013 included evaluation of the TCRA elements referenced below:

- Visual inspection of the security fence and signage surrounding the TCRA Site.
- Visual inspection of the armored cap located above the water surface.
- Visual confirmation that waste materials are not being actively eroded into the San Jacinto River.
- Collection of hydrographic and topographic survey data of the armored cap to compare the current elevations with the survey performed during the October 2012 quarterly inspection.
- Manual probing of armored cap thickness at contiguous areas identified by the monitoring survey as more than 6 inches lower in elevation than in the October 2012 quarterly inspection survey.

Visual Inspection

The visual inspection included observing the current conditions of the perimeter fence, warning signs, and the portion of the armored cap visible above the water line of the San Jacinto River. Figure 2 displays the location of the perimeter fence and the stand-alone signs around the armored cap (additional signs are affixed directly onto the perimeter fence). An initial visual inspection was performed on January 11, 2013. Photographs of conditions observed during the visual inspection are provided in Appendix A (Figures A-1 to A-7).

[2] The OMM Plan was attached to the Draft Final RACR, submitted to USEPA on November 22, 2011, and authorization to implement the OMM Plan was contained in an email from USEPA dated January 18, 2012. The OMM Plan was also attached as an appendix to the Revised Draft Final RACR submitted to USEPA on March 9, 2012.

There was a low tide during the January 11, 2013 visual inspection because of northerly winds. This low tide exposed two localized areas of the TCRA armored cap cover with less than 12 inches of stone cover thickness. The underlying geotextile layer in those areas was intact and there was no evidence that any of the underlying materials were or had been exposed. The USEPA was notified of this condition through a phone conversation and submission of a notification letter on Tuesday, January 15, 2013. The Respondents conducted a field investigation during a low-tide event on Thursday, January 17, 2013 collecting topographic and probing data that identified three additional areas that had less than 12 inches of stone cover thickness and would require maintenance. One of the three additional areas also required geotextile placement over an approximate 2 foot by 2 foot area. Further phone communications with the USEPA took place on Thursday, January 17, 2013, and an additional written notification was submitted to USEPA on January 18, 2013. The Respondents continued to evaluate the TCRA cap during the low tide conditions that existed on January 17 and January 18, 2013. The low tide event on Friday, January 18, 2013 was the lowest of any of the inspection days, and was at -2 foot mean sea level (MSL)[3].

A summary of each facet of the visual inspection is provided in the following sections.

Armored Cap

Photographs of the armored cap from the inspection event are provided in Appendix A (see photographs 8, 9, 10, 14, and 16 through 25). All of the visible portions of the armored cap were observed to be intact, with the exception of localized areas of the stone cover in the Eastern Cell. Substantial amounts of recently deposited sediment and biological growth (oysters, clams, and algae) were also observed over much of the Eastern Cell.

The Respondents completed field inspections and evaluations necessary to address this maintenance issue on January 17, 2013 and January 18, 2013. The Respondents prepared and submitted to the USEPA a Maintenance Plan on January 23, 2013, which was approved by the USEPA pursuant to an email dated January 24, 2013. The Respondents initiated and completed all necessary maintenance to the armored stone cover layer. As detailed in the attached Maintenance Completion Report (Appendix B), preventative maintenance activities

[3] Tide elevations are downloaded from the Texas Coastal Ocean Observation Network (TCOON) Lynchburg gauge.

were also carried out for a small area in the Western Cell, and repairs were completed on sections of the perimeter fence.

All other portions of the armored cap that were visible during the inspection were observed to be intact, with no breaches or other damage. No movement or erosion of waste materials into the San Jacinto River was observed at any location during the visual inspection.

Perimeter Fencing

The perimeter fencing (Figure 2) on the west and east banks of the San Jacinto River was visually inspected for breaches or other signs of damage on January 11, 2013 and again on January 28, 2013 during the maintenance activities for the TCRA armored cap cover. No breaches or other signs of fence damage were observed during the January 11, 2013 inspection for any of the three sections of the fence: the east bank, the west bank on the north side of I-10, or the west bank on the south side of I-10. Incidental damage to the fence post at the east bank access gate was observed; however, there was no indication of a breach or deficiency in the TCRA Site security fencing. For examples, see Photographs 1 through 5 in Appendix A. Subsequent inspections by the USEPA and the Respondents prior to and during the maintenance event found two breached areas along the southern fence line parallel to I-10 on the west bank of the San Jacinto River. Repairs to these areas were included in the maintenance event.

The portion of the fence installed along the south boundary of the San Jacinto River Fleet (SJRF) property is not included in the fencing inspection, as it is currently an active facility that conducts daily security checks, as required by the U.S. Coast Guard and Transportation Security Administration, for an active maritime fleeting area.

Signage

"Danger" and "No Trespassing" signs are posted at regular intervals on the perimeter fencing surrounding the Site. For examples, see Photographs 1, 3, and 4 in Appendix A. These signs were observed to be in place during the January 11, 2013 inspection.

A total of fifteen "Danger" and "No Trespassing" signs were installed at the TCRA Site around the perimeter of the land portion of the TCRA Site; the signs are mounted on steel

posts and set in concrete pads. For examples, see Photographs 13 and 15 in Appendix A. These signs were observed to be in place during the January 11, 2013 inspection. These signs are intended to face the San Jacinto River to deter water-based entry to the TCRA Site. Several of these signs had rotated out of proper alignment due to the wind; the affected signs were re-aligned to the intended viewing perspective.

Three USEPA Public Notice signs are present around the TCRA Site located: 1) near the gate entry point for the perimeter fence north of I-10; 2) near a gate entry point south of I-10; and 3) at the end of the TxDOT right-of-way north of I-10 near the San Jacinto River. For an example, see Photograph 6 in Appendix A. These three signs were observed to be in place and undamaged.

Table 1 summarizes the condition of the TCRA Site signage described in this section.

Table 1

TCRA Perimeter Fencing and Sign Inspection Punch List

Task	Status	
	Completed	Date
Perimeter Fence Visually inspect the perimeter fencing on the east and west sides of the San Jacinto River.	Yes	1/11/2013
"Danger" and "No Trespassing" Signs Visually inspect the 15 signs to verify that they remain in place.	Yes	1/11/2013
USEPA Public Notice Signs Visually inspect the 3 signs to verify that they remain in place.	Yes	1/11/2013

Surveys

Portions of the armored cap above the water surface or at a water depth too shallow to access by boat were surveyed using land-based topographic survey techniques. A bathymetric survey was performed for the portions of the armored cap below the water surface and accessible by boat. The surveyor followed the track line spacing, measurement intervals, and accuracy requirements detailed in the OMM Plan.

A small area in the intertidal zone was not safely accessible by either topographic or bathymetric methods (Figure 3). Seasonally low tides with north winds during the month of January prevented safe access by boat to the areas identified on Figure 3. Algal and crustacean growths in these small areas were hazardous for the surveyor to access by foot. Visual inspection in this area indicates that no movement of the armored cap has occurred in these areas.

Survey Tolerance Requirements

The OMM Plan requires that each survey be compared with the prior completed survey using the following criteria:

1. Areas with elevations that are within 6 inches of the previous survey require no action.
2. Contiguous areas with elevation changes exceeding plus or minus 6 inches triggers a review of the survey benchmarks for accuracy or movement.
3. Areas where surveyed elevations are 6 inches higher or lower than the prior survey for a contiguous area larger than 30 feet by 30 feet will require probing to measure the cap thickness.

Survey Results

The survey for this quarterly inspection event was conducted by Hydrographic Consultants, Ltd. Hydrographic survey data were collected from January 22, 2013 to January 28, 2013; upland topographic data were collected from January 3, 2013 to January 30, 2013. The topographic survey required additional days to complete in order to accommodate the maintenance event, and the hydrographic survey was offset as a result of the consistently low tide conditions at the TCRA Site during the month of January 2013. Figure 3 displays the results of the completed survey.

This survey dataset was compared to the dataset from the previous quarterly inspection survey[4] to evaluate the differences in the top of the armor cap elevation between surveys. These differences are shown on Figure 3. The survey results indicate there appears to be a substantial amount of new material being deposited on the surface armored cap, as may be

[4] Hydrographic Consultants, Ltd. conducted the previous quarterly inspection survey; that survey event was completed October 2, 2012.

expected in a fluvial system like the San Jacinto River. These results are also consistent with visual observations of the normally submerged portions of the Eastern Cell. Manual probing of armored cap thickness is required at areas identified by the topographic or bathymetric surveys as more than 6 inches lower in elevation than during the prior survey over contiguous areas of 30 foot by 30 foot. Based on the results of the hydrographic and bathymetric surveys, additional probing was not required or initiated on this basis.

Repairs to TCRA Construction Elements

As discussed above, the only TCRA construction elements found to be deficient from the conditions observed during the January 2013 inspections were the localized areas of the armored stone cover layer in the Eastern Cell and portions of the TCRA Site fencing.

The areas in the Eastern Cell were characterized by reduced stone cover thickness or other conditions, as described in the TCRA Inspection Repair Report. While the maintenance work was being performed, one small area required some geotextile repair. The TCRA Site fencing deficiencies identified along the western bank of the San Jacinto River consisted of cut chain link and bent/mangled bottom sections. All maintenance activities for the TCRA armor stone layer and repair activities for the deficient areas of TCRA Site security fencing have been completed. These activities are detailed in the attached Maintenance Completion Report (Appendix B).

Inspection Summary

The visual inspection event on January 11, 2013 did not identify damaged or otherwise deficient areas in the perimeter fence or signage. Incidental damage to the fence center post at the eastern gate was noted, but did not require action, as it was not identified as a breach in the fencing. However, additional inspections of the TCRA Site fencing during the armored cap survey and maintenance event identified two breaches in the perimeter fence. These two areas were repaired by the Respondents' Fence Contractor; all repair activities were completed by February 6, 2013. Details regarding the TCRA Site fencing repairs are provided in the attached Maintenance Completion Report; see photographs 26 through 28 of Appendix A for examples of the fencing repairs.

During the visual inspection and subsequent thickness probing surveys of the armored cap, five localized deficiencies were noted for the stone cover in the Eastern Cell; these deficiencies have been repaired as described in the Maintenance Completion Report (Appendix B). During maintenance activities, the on-site team was notified of a potential maintenance area near the northwest corner of the Western Cell. This area was identified as a location for preventative maintenance and has been repaired as described in the Maintenance Completion Report (Appendix B).

No deficiencies were identified by the topographic or bathymetric surveys.

List of Figures

Figure 1 - Vicinity Map
Figure 2 – Fence and Warning Sign Layout
Figure 3 – January 2013 Quarterly Inspection Survey

List of Appendices

Appendix A – Inspection Photographic Log
Appendix B – Maintenance Completion Report

References

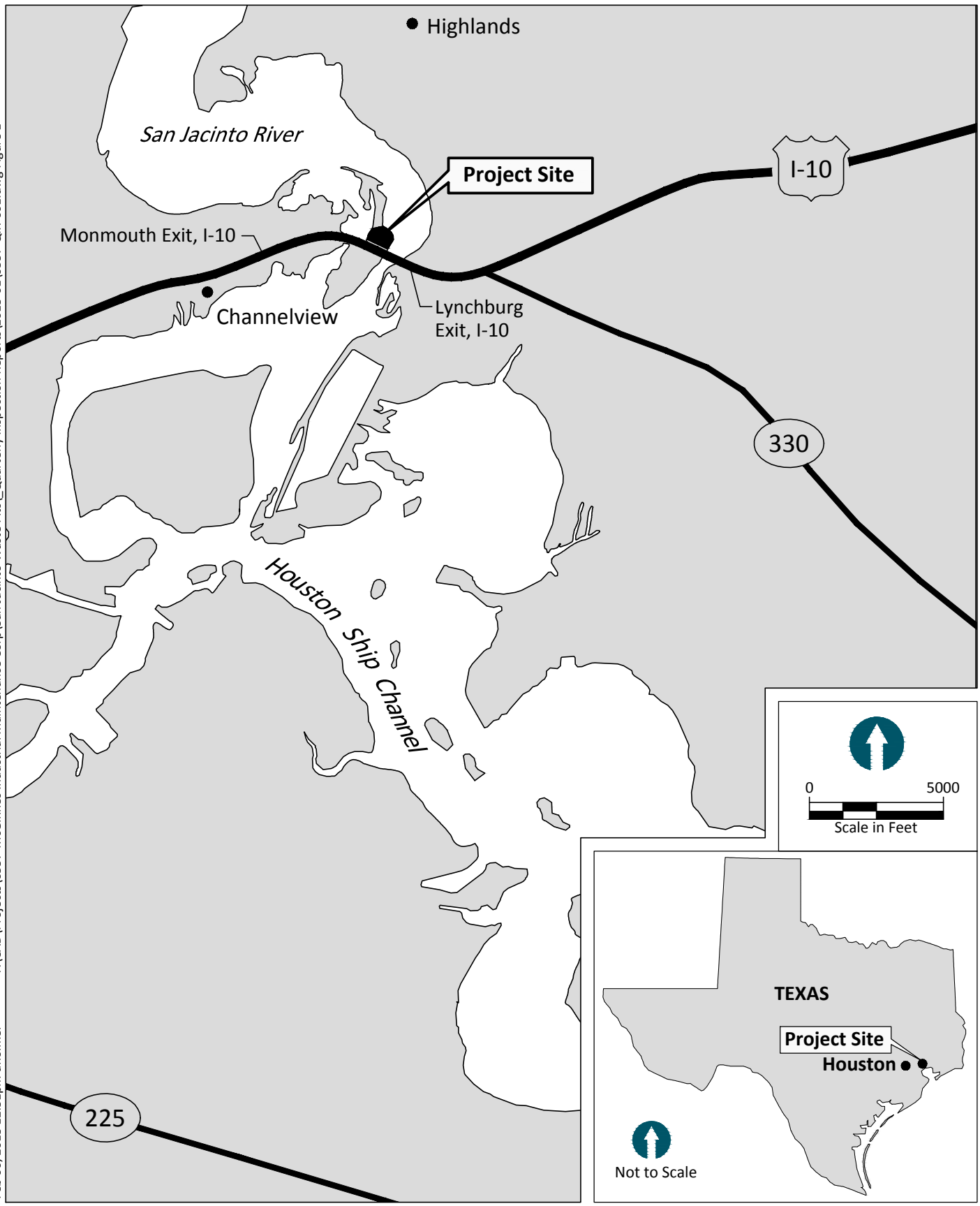
Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. November 2010.

Anchor QEA, 2011. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency (USEPA) Region 6. Revised March 2012.

USEPA, 2010. *Administrative Settlement Agreement and Order on Consent for Removal Action*. U.S. Environmental Protection Agency Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company & McGinnes Industrial Management Corporation, Respondents.

FIGURES



Feb 06, 2013 12:31pm dholmer T:\CAD\Projects\0557-McGinnes Industrial Maintenance Corp\San Jacinto Waste Pits_Quarterly Inspection Reports\2013-01\0557-QIR-001.dwg Figure 1

Figure 1
Vicinity Map
Post TCRA Quarterly Inspection (January 2013)
San Jacinto River Waste Pits Superfund Site

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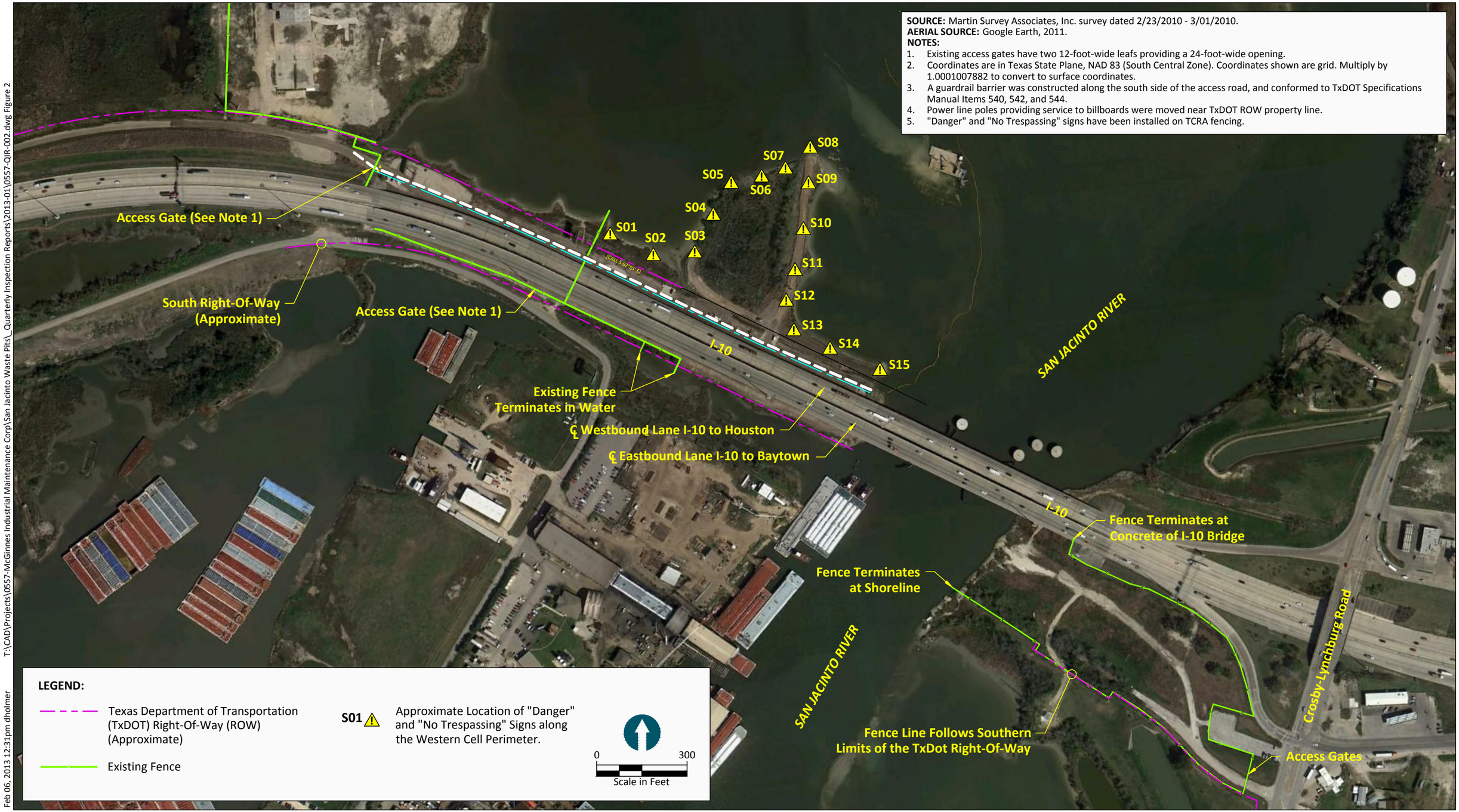

T:\CAD\Projects\0557-McGinnes Industrial Maintenance Corp\San Jacinto Waste Pits_Quarterly Inspection Reports\2013-01\0557-QIR-002.dwg Figure 2

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Figure 2
Fence and Warning Sign Layout
Post TCRA Quarterly Inspection (January 2013)
San Jacinto River Waste Pits Superfund Site

LEGEND:

- Existing Contour (1 Foot Interval)
- B/C — Armored Cap Type and Boundary
- Historic Impoundment Limits
- Visual Survey Only
- > 1.0 Foot Increase
- 0.5 Foot Increase to 1.0 Foot Increase
- 0.5 Foot Increase to 0.5 Foot Decrease
- 0.5 Foot Decrease to 1.0 Foot Decrease
- > 1.0 Foot Decrease
- 30' × 30' — Example 30'x30' Area

SOURCE: Drawing prepared from surveys provided by Hydrographic Consultants dated October 2012 and January/February 2013.
HORIZONTAL DATUM: Texas State Plane South Central, NAD83, U.S. Feet.
VERTICAL DATUM: NAVD 88.

0 — 120
Scale in Feet

Feb 06, 2013 12:31pm dholmer T:\CAD\Projects\0557-McGinnes Industrial Maintenance Corp\San Jacinto Waste Pits_Quarterly Inspection Reports\2013-01\0557-QIR-003.dwg Figure 3

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Figure 3
January 2013 Quarterly Inspection Survey
Post TCRA Quarterly Inspection (January 2013)
San Jacinto River Waste Pits Superfund Site

APPENDIX A
INSPECTION PHOTOGRAPHIC LOG

Photo 01: Warning sign and perimeter fence south of I-10 on west bank (view northeast)

Photo 02: Public notice sign south of I-10 (view north)

Photo 03: TCRA Site security fencing on the east bank (view north)

Photo 04: Access gate on east bank (view northwest)

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Figure A-1
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 05: Bent center post of east access gate (view east)

Photo 06: Public notice sign north of I-10 at main access gate (view southeast)

Photo 07: TCRA Site access gate (view east)

Photo 08: Interior of Western Cell with standing water (view northeast)

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Figure A-2
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 09: Eastern Cell as viewed from the intersection of the central and southern berms (view northeast)

Photo 10: Northern face of southern berm and warning signs (view east)

Photo 11: Public notice sign north of I-10 along southern berm (view southwest)

Photo 12: Thin armor cap area identified during visual inspection (view north)

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Figure A-3
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 13: Warning sign at southern end of the central berm (view northwest)

Photo 14: Low tide conditions in the Eastern Cell; note sedimentation and biological growth (view east)

Photo 15: Warning sign and eastern face of the central berm (view northwest)

Photo 16: Areas (foreground and background) of thin armor cap area and exposed geotextile identified during visual inspection (view northwest)

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Figure A-4
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 17: Background location from Photo 16 of thin armor cap area and exposed geotextile identified during visual inspection (view southwest)

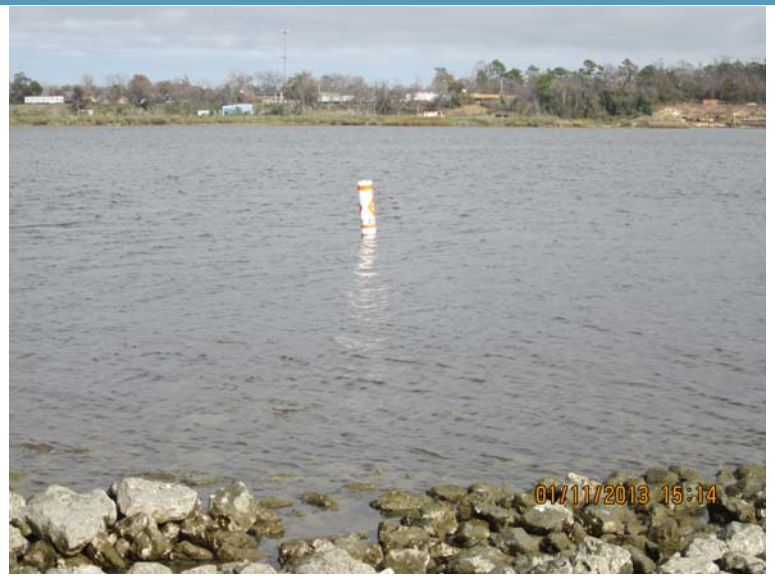

Photo 18: Warning buoy near the northern end of the Eastern Cell (view northwest)

Photo 19: Northern portion of the Eastern Cell; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view west)

Photo 20: Northern end of the central berm; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view north)

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Figure A-5
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 21: Western edge of the Western Cell (view south)

Photo 22: Interior view of the Western Cell with standing water in the background along the central berm (view southeast)

Photo 23: Warning sign on west berm (view east)

Photo 24: Area of Eastern Cell showing biologic growth and sediment deposition (view northeast)

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Figure A-6
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

Photo 25: Southern end of the west berm; color variation in armor rocks indicates the submerged portions of the cap under normal tidal conditions (view southwest)

Photo 26: Repaired fence fabric, south alignment, west bank of the San Jacinto River I-10 crossing (view north)

Photo 27: Added lower supports on adjacent panels to secure fence fabric and barb wire (view northwest)

Photo 28: New gate center post installation, east bank (view north)

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Figure A-7
Site Photographs
Post TCRA Inspection Report (January 2013)
San Jacinto River Waste Pits Superfund Site

APPENDIX B

MAINTENANCE COMPLETION REPORT

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MEMORANDUM

To:	Valmichael Leos, Barbara Nann, USEPA	**Date:**	February 15, 2013
From:	Wendell Mears, David Keith, John Verduin, and John Laplante, Anchor QEA, LLC	**Project No.:**	090557-01
Cc:	Dave Moreira and Andrew Shafer, MIMC Phil Slowiak, IP		
Subject:	San Jacinto River Waste Pits TCRA Maintenance Completion Report		

INTRODUCTION

This document provides a summary of recent maintenance activities related to the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (TCRA Site). Maintenance activities on the armored cap protective cover were conducted from January 25, 2013 through January 31, 2013 and to the fence system on February 5 and 6, 2013.

BACKGROUND

The TCRA was implemented by International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) under an Administrative Settlement Agreement and Order on Consent (AOC) with the U.S. Environmental Protection Agency (USEPA) – Docket No. 06-12-10, effective May 17, 2010 (USEPA 2010). A description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Draft Final Removal Action Completion Report[1] (RACR; Anchor QEA 2012)

[1] David Keith, the Respondents' the Project Coordinator, received a RACR (in the form issued by USEPA) from Valmichael Leos via email on August 15, 2012; the appendices to the RACR including the OMM Plan, was not provided to Dr. Keith as part of the document. In the OMM Plan had been previously approved by USEPA (in an email from Mr. Leos dated January 18, 2012), it is assumed to remain unchanged. Respondents reserve all rights related to the changes made by USEPA to the Revised Draft Final RACR, submitted by Respondents to USEPA on March 9, 2012.

The inspection and maintenance activities summarized in this document were conducted in accordance with the schedule established in the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2012)[2]. The OMM Plan specifies the timing and procedures for inspecting and repairing the armored cap cover, fencing, and signage installed for the TCRA.

The inspection commenced on Friday, January 11, 2013. The Respondents identified a need for maintenance within two localized areas of the TCRA cap where geotextile was visible. The USEPA was notified of this condition through a phone conversation and the submission to USEPA of a notification letter on Tuesday, January 15, 2013 (See Attachment 1). The Respondents conducted a field investigation during a low-tide event on Thursday, January 17, 2013 collecting topographic and probing data that identified three additional maintenance locations. Notification was provided to USEPA through an additional phone conversation and notification letter on Friday, January 18, 2013 (See Attachment 1). After further verbal conversation with the USEPA on Thursday, January 17, 2013 the Respondents continued to evaluate the TCRA cap during the low tide conditions that existed during the next two days. The low tide event on Friday, January 18, 2013 was intensified by a northwesterly weather front passing the Site, resulting in a -2 foot mean sea level (MSL) tide[3].

Areas of the armored cap cover that had been installed via water-based equipment as part of the TCRA were verified post-construction by hydrographic survey and thickness probing on a 30 foot by 30 foot grid, without the benefit of a visual assessment because of water levels. Low tides during the January 2013 inspection exposed areas of the Eastern Cell that are normally submerged and allowed for the Respondents to visually inspect and verify the armored cap cover in these areas.

Using the data collected on Thursday, January 17, 2013 and Friday, January 18, 2013 five armored cap maintenance areas (MA) were identified in the Eastern Cell of the TCRA (Figure 1). A TCRA Cap Maintenance Plan was developed that utilized materials stockpiled

[2] The OMM Plan was attached to the Draft Final RACR, submitted to USEPA on November 22, 2011 and authorization to implement the OMM Plan was contained in an email from USEPA dated January 18, 2012. The OMM Plan was also attached as an appendix to the Revised Draft Final RACR submitted to USEPA on March 9, 2012.

[3] Tide elevations are downloaded from the Texas Coastal Ocean Observation Network (TCOON) Lynchburg gauge.

for maintenance of the TCRA cover (Anchor QEA 2012). These materials had been ordered, tested, and stockpiled as part of the TCRA construction project. The TCRA Cap Maintenance Plan was submitted to the USEPA on Wednesday, January 23, 2013 (Attachment 2) and approved by USEPA in an email dated Thursday, January 24, 2013 (Attachment 3). In accordance with the OMM Plan, the Respondents' contractor, USA Environment, LP (Contractor), mobilized to the Site on Friday, January 25, 2013 to begin maintenance activities.

ACTIVITIES

Pre-Mobilization and Mobilization Activities – Friday, January 25, 2013 to Monday, January 28, 2013

Pre-mobilization activities included reviewing and updating the Contractor's Health and Safety Plan (HASP), insurance certificates; notifying and coordinating with the Texas Department of Transportation (TxDOT); ordering materials and equipment; and notifying the USEPA. Delivery of equipment and materials to the TCRA Site occurred on January 28, 2013. Photographs and a log of activities are provided in Attachment 4 (Mobilization, Maintenance, and Demobilization Daily Reports). The main components and equipment deliveries that were completed were:

- Completed delivery of two Skid Steer loaders to the Site
- Completed delivery of a wheeled front end loader at the stockpile area
- Completed preconstruction topographic survey of MA 1
- Delivered "C" rock to the temporary stockpile area

Maintenance Activities – Monday, January 28, 2013 to Wednesday, January 30, 2013

Construction activities began each day with a tailgate safety meeting. Dump trucks delivered "C" and "D" rock from the off-Site stockpile to the TCRA Site, end dumping the rock onto the temporary stockpile area in the southeast corner of the Western Cell. MA 1 was partially completed on Monday, January 28, 2013. A surveyor was present during the maintenance event to mark, survey, and probe the maintenance areas. In addition to the maintenance activity at the TCRA Site, based on a recommendation from the USEPA, the San Jacinto River east bank areas were inspected for evidence of occupancy. An area in which there was evidence of the presence of trespassers was identified under the east bound lane of Interstate 10. Evidence of heat or cooking fires was found, in addition to clothing, food, and bedding.

A local TxDOT representative was notified for appropriate action. The USEPA representative who was on-site that day was advised of the results of the inspection and the action that had been taken.

On Wednesday, January 30, 2013 drizzling rain, sustained winds from the south, and the resultant high tides hampered maintenance activities; repairs to MA 1 were completed and haul routes to the remaining MAs were prepared. In addition to a reported fence breach from the previous week's inspection, a second fence breach and entry point was identified. The fence contractor National Fence Company (NFC; Fence Contractor), was notified, and a visit to inspect and repair the fencing was scheduled for the following day.

A northwesterly frontal system and low tides resulted in very low water levels on Wednesday, January 30, 2013. Cap maintenance materials were loaded, transported, and placed atop or near the MAs in the Eastern Cell with the Skid Steers, as outlined in the TCRA Cap Maintenance Plan (See Attachment 2). Repairs to MAs 1, 2, 3, and 5 were completed using per the TCRA Cap Maintenance Plan. A long reach excavator on mats traversed the cap from the central berm to an area near MA 4. The Skid Steers transported aggregate to the excavator, which placed the material in the MA. As each MA was completed, the surveyor verified that the required thickness was placed per the OMM Plan via survey and probing. Following the completion of all repairs to the MAs, the excavator and Skid Steers were removed from the Eastern Cell.

During the work day on January 30, 2013 a NFC representative examined the breaches in the perimeter fencing to develop plans for maintenance of the fence. Subsequently, two panels were repaired and three additional panels were reinforced. The east access gate center post was also replaced due to minor damage.

Preventative Maintenance Activities – Wednesday, January 30, 2013

While completing planned maintenance, the on-Site team was notified by USEPA of a potential MA near the northwest corner of the Western Cell. After further review on-Site, an exposed geotextile fabric that was part of an overlap with another panel and armored cap was covered with 12 to 18 inches of the remaining "C" and "D" rock. The overlap covered existing armor rock and fabric—the additional rock was placed to cover the overlapping

fabric. This MA was delineated before and after placing the additional aggregate and is shown as MA 6 on Figure 1.

Demobilization Activities – Thursday, January 31, 2013

After a brief tailgate safety meeting, the Contractor, USA, loaded the mats, Skid Steers, and excavator for transport. The TxDOT right-of-way was inspected for damage and debris. All actions within the TCRA Site were completed on Thursday, January 31, 2013.

Fence Maintenance Activities – Tuesday, February 5 to Wednesday, February 6, 2013

After a brief safety and scope meeting on Tuesday, February 5, 2013, the Fence Contractor, NFC, started maintenance on the security fencing. The required maintenance items were completed on Wednesday, February 6, 2013. Barbed wire was added at the base of the fence to help preclude and discourage future entry to the TCRA Site.

ATTACHMENTS

Figure 1 – TCRA Maintenance Area Locations
Attachment 1 – Respondents' Notification of Deficiency to USEPA
Attachment 2 – Respondents' TCRA Cap Maintenance Plan
Attachment 3 – USEPA TCRA Cap Maintenance Plan Approval
Attachment 4 – Mobilization, Maintenance, and Demobilization Daily Reports

REFERENCES

Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. November 2010.

Anchor QEA, 2011. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance

Corporation, International Paper Company, and U.S. Environmental Protection Agency (USEPA) Region 6. Revised March 2012.

USEPA, 2010. *Administrative Settlement Agreement and Order on Consent for Removal Action*. U.S. Environmental Protection Agency Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company and McGinnes Industrial Management Corporation, Respondents.

FIGURES

LEGEND:

- Existing Contour (1 Foot Interval)
- B/C — Armored Cap Type and Boundary
- Historic Impoundment Limits
- Visual Survey Only; Not Accessible Jan. 2013
- MA 1 — Maintenance Area

SOURCE: Drawing prepared from surveys provided by Hydrographic Consultants dated January 2013.
HORIZONTAL DATUM: Texas State Plane South Central, NAD83, U.S. Feet.
VERTICAL DATUM: NAVD 88.

0 120
Scale in Feet

Feb 12, 2013 2:48pm dholmer T:\CAD\Projects\0557-McGinnes Industrial Maintenance Corp\San Jacinto Waste Pits_Quarterly Inspection Reports\2013-01\0557-QIR-004.dwg MA Locations

ANCHOR QEA

Figure 1
Maintenance Area Locations
Maintenance Completion Report
San Jacinto River Waste Pits Superfund Site

ATTACHMENT 1

RESPONDENTS' NOTIFICATION OF DEFICIENCY TO USEPA

ANCHOR QEA

614 Magnolia Avenue
Ocean Springs, Mississippi 39564
Phone 228.818.9626
Fax 228.818.9631

January 15, 2013

Valmichael Leos
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2750

Re: San Jacinto River Waste Pits Time Critical Removal Action Cap Inspection Notification
Project Number: 090557-01

Dear Valmichael:

In accordance with Section 3.1 of the Operations, Monitoring, and Maintenance (OMM) Plan for the Time Critical Removal Action (TCRA) at the San Jacinto River Waste Pits Superfund Site (Site), Anchor QEA conducted an inspection of the TCRA that commenced on Friday, January 11, 2013. This letter provides notice that, as part of the inspection, two small areas in the Eastern Cell were observed during the inspection with limited, or no armor cover. One area is parallel to the southeastern berm and the other is east of the central berm towards the northern end. In both areas, geotextile is visible and intact.

Pursuant to Section 3 of the OMM Plan, Anchor QEA is initiating supplemental field inspections to obtain additional survey data. Following an evaluation of this information, and in accordance with the OMM Plan, a maintenance plan will be submitted to the USEPA for approval. Our preliminary review indicates that these areas can be readily addressed through the placement of additional stone capping material. The schedule for the plan and subsequent maintenance will be discussed with you later this week. Please feel free to contact me to discuss in further detail.

Sincerely,

David Keith
Anchor QEA, LLC

Cc: Barbara Nann, U.S. Environmental Protection Agency
Philip Slowiak, International Paper Company
David Moreira, McGinnes Industrial Maintenance Corporation
Andrew Shafer, McGinnes Industrial Maintenance Corporation

ANCHOR QEA

614 Magnolia Avenue
Ocean Springs, Mississippi 39564
Phone 228.818.9626
Fax 228.818.9631

January 18, 2013

Valmichael Leos
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2750

Re: San Jacinto River Waste Pits Time Critical Removal Action Cap Inspection Notification
Project Number: 090557-01

Dear Valmichael:

In accordance with Section 3.1 of the Operations, Monitoring, and Maintenance (OMM) Plan for the San Jacinto River Waste Pits Time Critical Removal Action (TCRA), this letter provides notification that on January 17, 2013, during our surveying and probing of the armor cap being performed to address the two small areas in the eastern cell that we notified you of on January 15, 2013, we observed additional areas that will require maintenance.

Wind and tides conditions over the last two days have been very favorable for a detailed visual inspection and surveying of the surface of the cap over large parts of the eastern cell that are normally submerged. That detailed visual inspection and surveying resulted in the discovery of additional areas that will require maintenance, and we are continuing to survey and probe those areas today. One area in particular, constructed with Armor Rock A, and measuring approximately two feet by two feet, exhibits a slight depression. It appears that the geotextile underlayment in this area may no longer be present (visual observation is hindered by the presence of standing water), but manual probing confirms that a 12 to 18 inch layer of Armor Rock A cap material and sediment is present within the depression. We are continuing to evaluate that particular location.

Pursuant to Section 3 of the OMM Plan, Anchor QEA is continuing with supplemental field inspections to obtain additional survey data of all locations today. Following an evaluation of this information, and in accordance with the OMM Plan, a maintenance plan will be submitted to the USEPA for approval. Our preliminary review indicates that these areas can be readily addressed through the placement of additional stone capping material and if necessary, a geotextile over-placement with armor rock at the one location. The schedule for the plan and subsequent maintenance will be discussed with you early next week. Please feel free to contact me to discuss in further detail.

Sincerely,

David C. Keith

David Keith
Anchor QEA, LLC

Cc: Barbara Nann, U.S. Environmental Protection Agency
Philip Slowiak, International Paper Company
David Moreira, McGinnes Industrial Maintenance Corporation
Andrew Shafer, McGinnes Industrial Maintenance Corporation

ATTACHMENT 2
RESPONDENTS' TCRA CAP MAINTENANCE PLAN

ANCHOR QEA

614 Magnolia Avenue
Ocean Springs, Mississippi 39564
Phone 228.818.9626
Fax 228.818.9631

January 23, 2013

Valmichael Leos
EPA Project Coordinator (6SF-RA)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: San Jacinto River Waste Pits Superfund Site Time Critical Removal Action
TCRA Cap Maintenance Plan
CERCLA Docket No. 06-12-10
Project Number: 090557-01

Dear Mr. Leos:

You were notified on January 15, 2013 and January 17, 2013 that inspections conducted pursuant to Section 3 the Operations, Monitoring, and Maintenance (OMM) Plan for the San Jacinto River Waste Pits Time Critical Removal Action (TCRA) had identified areas in the Eastern Cell in which maintenance was required. On January 18, 2013, the specific areas were further verified and delineated. This letter is to provide you with a proposed plan for conducting maintenance of the cap, in accordance with the requirements of Section 3 of the OMM Plan.

Figure 1 shows a map of the TCRA Site with the areas that require maintenance (hereinafter referred to as "Maintenance Areas"). Based on the inspection and survey data resulting from the recent quarterly inspection of the TCRA cap, there are five Maintenance Areas in the Eastern Cell with less than the required armor cover thickness. In one of those areas, Maintenance Area 2, there is a need for placement of a geotextile fabric in addition to armor stone.

CAP REPAIR PLAN

This section describes data collection conducted in connection with the cap maintenance and the plans for performing the maintenance, including the following:

- Data collection for cap maintenance planning
- Cap maintenance procedures
- QA/QC procedures during cap maintenance
- Continuing OMM Plan following cap maintenance

Data Collection

Additional survey and cap thickness probing data were collected on January 17 and 18, 2013 around the Maintenance Areas in the Eastern Cell. The survey and probing data were used to delineate the horizontal extent of the maintenance activities and to estimate the required armor stone volume needed to augment the armor layer.

Maintenance Procedures

The affected areas will be addressed by placing additional material in the Maintenance Areas in the Eastern Cell identified in Figure 1. The final cap surface will have at least 12 or 18 inches of armor rock (depending on rock type) covering these areas as required per the Removal Action Work Plan (RAWP).

For Maintenance Areas 1, 3, and 5, it is anticipated that the armor material will be placed from land access points using a small loader (Bobcat, Skid Steer or equivalent) equipment as appropriate, within the horizontal limits delineated for the maintenance activities. The contractor will use placement methods previously approved by USEPA in the RAWP to prevent damage to the geotextile. Depending on tides, the materials may be hand placed.

In Maintenance Area 2, which measures approximately 2 foot by 2 foot, Armor Cap C stone will be placed to achieve a uniform surface at the elevation of the surrounding geotextile. A geotextile fabric which meets the specifications in the RAWP for TCRA cap construction will then be installed over the C stone with a minimum 3 foot overlap on the adjacent geotextile. Armor rock will then be installed over the entire area in the manner similar to that described above for Maintenance Areas 1, 3, and 5.

For Maintenance Area 4, depending on water levels at the time of repair, the armor stone may be placed from water access points using marine-based equipment including, but not limited to, material transport barges; barge-mounted long-reach excavators, and support boats. Water-based rock placement activities may require an off-site load/dock facility and marine transport to deliver the armor cap rock to the TCRA Site. If water levels are low, the armor rock may be offloaded close to Maintenance Area 4 and then land placed, as stated above, into the area requiring maintenance.

The material used for the Maintenance Areas will be sourced from the Armor Cap C and D stockpile that is located approximately 15 miles from the TCRA Site. This material either meets or exceeds the approved design materials for the Maintenance Areas and was purchased and stockpiled expressly for maintenance purposes. As noted in the OMM Plan, the material has previously been tested and approved for gradation and chemistry.

As shown in the typical maintenance detail (Figure 2), Armor Rock C will be placed in Maintenance Areas 1, 2, 3, and 4 to assure the minimum 12 inch design criteria is achieved. In Maintenance Area 5, Armor Rock D will be placed to assure the minimum 18 inch design criteria is achieved as shown in Figure 2.

QA/QC and Reporting

Cap maintenance activities will be observed and documented using the QA/QC procedures provided in the OMM Plan and consistent with procedures used during TCRA construction. Specifically, the following QA/QC procedures will be taken to assure that the cap maintenance activities are in accordance with this Plan:

1. The Maintenance Areas will be clearly laid out with visual markings of the horizontal extent of the work area, using data collected during the surveys described above. The horizontal markings will include grade stakes, rebar, marking paint or similar methods that clearly identify the Maintenance Areas.
2. The quantity of cap material imported from the off-Site stockpile will be recorded. This quantity will be tabulated for each Maintenance Area in a completion summary so that the total of cap material delivery can be quantified. Quantity will be measured in cubic yards, as computed from the capacity of each truck and the estimated percentage full for each load.

3. After each day of work is completed, the surface area (square footage) of cap maintenance will be measured by survey. This area will be compared to the volume imported to confirm that enough material was placed to equal or exceed the minimum required cap thickness.
4. Photographs will be taken daily to document the progress of the work, if at low tide.
5. A daily report will be prepared summarizing the day's work activity. The format of the report and details recorded will be consistent with the daily reports that were generated during TCRA construction.
6. Following completion of the maintenance activities, a survey of the top of cap surface will be performed in accordance with the OMM Plan. This survey will be compared to the survey information described above to document that the required thickness of the cap has been placed in the Maintenance Areas.

Upon completion of the maintenance activities, a maintenance report will be prepared documenting the work as complete, and submitted to USEPA for review and approval.

We request USEPA's review and approval of this plan as soon as possible. Mobilization of the repair response will begin within one business day of USEPA approval of this proposed maintenance plan. We are coordinating with the TCRA contractor, USA Environment, and will keep USEPA informed of the exact start date of the maintenance work. Actual placement will be driven by tides and timing related to mobilizing equipment to the TCRA Site. Please contact us if you have any questions.

Sincerely,

John P. Laplante for David C. Keith
Project Coordinator

cc: Barbara Nann, U.S. Environmental Protection Agency
Philip Slowiak – International Paper Company
David Moreira and March Smith – McGinnes Industrial Maintenance Corporation

FIGURES

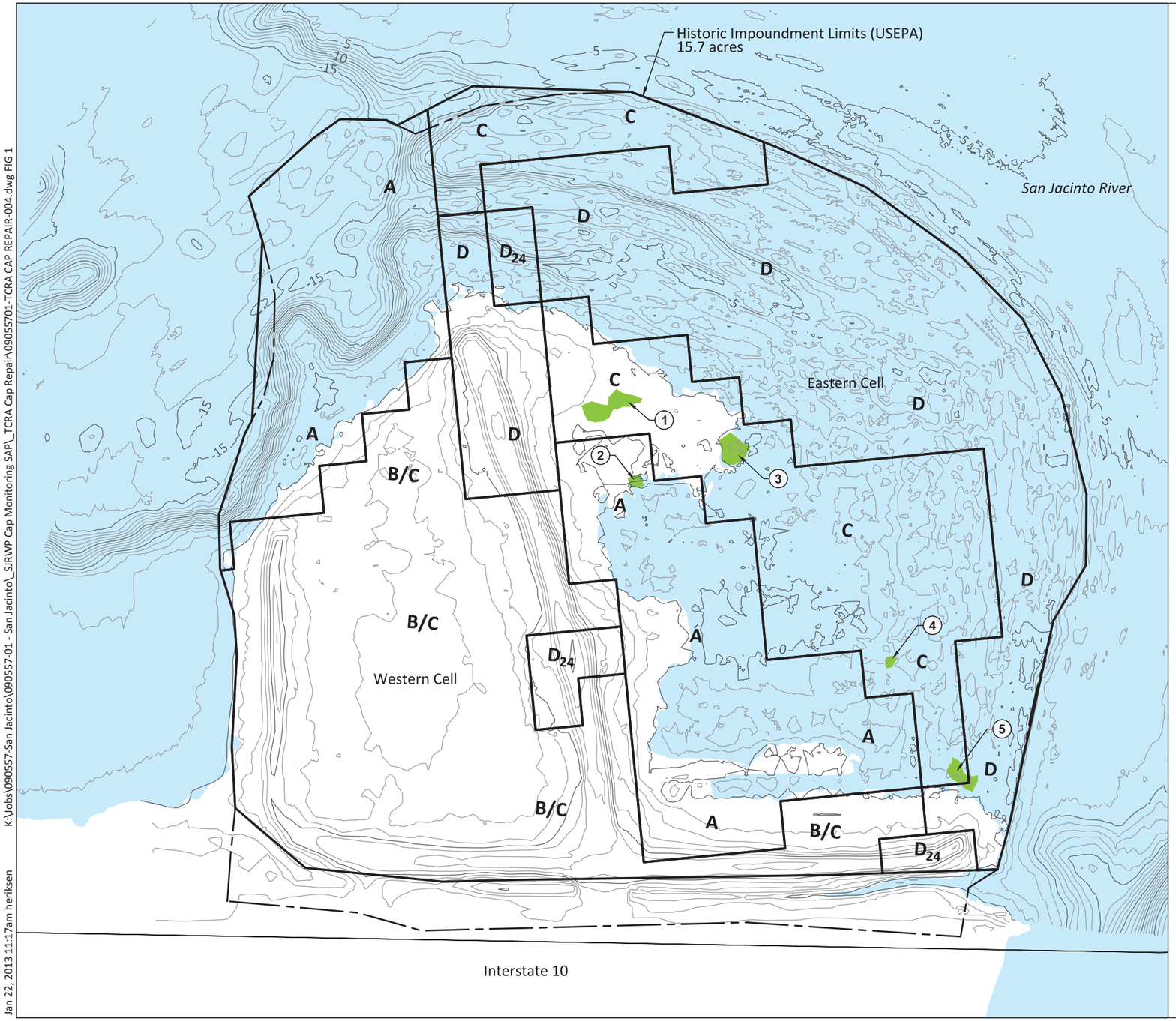
Figure 1 – TCRA Site Map

Figure 2 – Typical TCRA Cap Maintenance Detail

REFERENCES

Anchor QEA, 2011. *Final Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency Region 6. March 2012.



LEGEND:

-5 Post-Construction Contour, 10/2012 (1-foot interval)

Historic Impoundment Limit (USEPA)

Maintenance Area

HORIZONTAL DATUM: Texas South Central, NAD83. US Survey Feet.
VERTICAL DATUM: NAVD88.

0 120
Scale in Feet

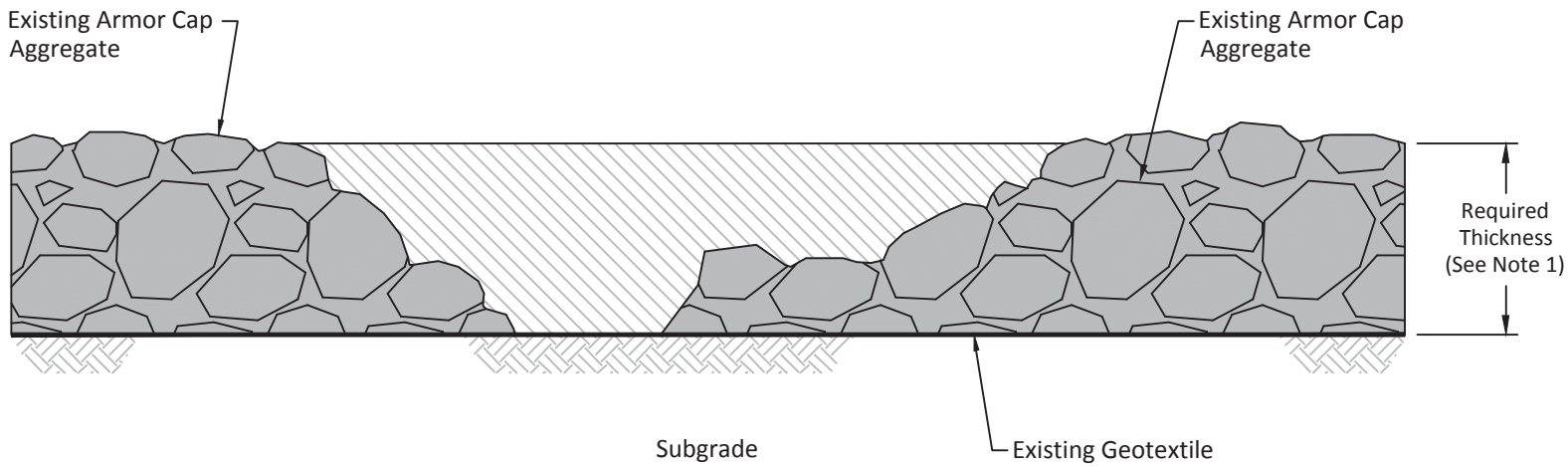
K:\Jobs\090557-San Jacinto\090557-01 - San Jacinto_SJRWP Cap Monitoring SAP_TCRA Cap Repair\09055701-TCRA CAP REPAIR-004.dwg FIG 1

Jan 22, 2013 11:17am heriksen

ANCHOR QEA

Figure 1
TCRA Site Map
TCRA Cap Maintenance
San Jacinto River Waste Pits Superfund Site

Jan 21, 2013 1:42pm dholmer K:\Jobs\090557-San Jacinto\090557-01 - San Jacinto_SJRWP Cap Monitoring SAP_TCRA Cap Repair\09055701-TCRA CAP REPAIR-003.dwg FIG 2



LEGEND:

Additional Overlay of Armor Cap Aggregate

NOTES:

1. Minimum thickness of cap must be at least 12 inches in Armor Cap A and Armor Cap C locations, and 18 inches in Armor Cap D locations.
2. Contractor shall use placement methods that do not damage existing geotextile. Any damage caused by contractor shall be repaired to the owner's satisfaction at no additional cost.
3. Contractor shall use low ground pressure construction equipment and shall minimize maneuvering on the cap surface. Contractor shall repair any visible surface disturbance that was caused by the contractor's operations.
4. Contractor staff operating on site shall be 40-hour HAZWOPER trained.

ANCHOR QEA

Figure 2
Typical TCRA Cap Maintenance Detail
TCRA Cap Maintenance
San Jacinto River Waste Pits Superfund Site

ATTACHMENT 3
USEPA TCRA CAP MAINTENANCE PLAN APPROVAL

Wendell Mears

From: Leos.Valmichael@epamail.epa.gov
Sent: Thursday, January 24, 2013 5:29 PM
To: John Laplante
Cc: Al Axe; Nann.Barbara@epamail.epa.gov; David Keith; David Moreira; Andrew Shafer; Francis Chin; Miller.Garyg@epamail.epa.gov; John Cermak; Jennifer Sampson; John Verduin; Ken Haldin; Kerri Scott; Linda Henry; Luda Voskov; Phil Slowiak; Randy Brown; Rick Prior; Inglin, Sonja A.; Steve Ginski; Teri Freitas; Wendell Mears
Subject: Re: TCRA Maintenance Plan

I approve with the plan. Please proceed with the work.

Valmichael Leos
On Scene Coordinator (OSC)
Emergency Readiness Section
US Environmental Protection Agency Region 6
1445 Ross Ave. (6SF-PE)
Dallas, Texas 75202
Office: 214-665-2283
Fax: 214-665-2278

To report an Environmental Violation, visit EPA's website at http://www.epa.gov/compliance/complaints/index.html

From: John Laplante <jlaplante@anchorqea.com>
To: Valmichael Leos/R6/USEPA/US@EPA
Cc: Al Axe <aaxe@winstead.com>, Andrew Shafer <dshafer@wm.com>, Barbara Nann/R6/USEPA/US@EPA, David Keith <dkeith@anchorqea.com>, David Moreira <dmoreira@wm.com>, Francis Chin <FChin@wm.com>, Garyg Miller/R6/USEPA/US@EPA, "Inglin, Sonja A." <singlin@bakerlaw.com>, Jennifer Sampson <jsampson@integral-corp.com>, John Cermak <Jcermak@bakerlaw.com>, John Verduin <jverduin@anchorqea.com>, Ken Haldin <khaldin@wm.com>, Kerri Scott <kscott@anchorqea.com>, Linda Henry <lhenry@poha.com>, Luda Voskov <lvoskov@tceq.state.tx.us>, Phil Slowiak <philip.slowiak@ipaper.com>, Randy Brown <rbrown@anchorqea.com>, Rick Prior <Rick.Prior1@ipaper.com>, Steve Ginski <Steve.Ginski@ipaper.com>, "Teri Freitas" <tfreitas@anchorqea.com>, Wendell Mears <wmears@anchorqea.com>
Date: 01/23/2013 06:04 PM
Subject: TCRA Maintenance Plan

Valmichael –

Attached please find a copy of the TCRA Maintenance Plan in accordance with the San Jacinto River Waste Pits Time Critical Removal Action (SJRWP TCRA) Operations, Monitoring and Maintenance (OMM) Plan. Five hard copies are being transmitted via FedEx.

Please let us know if you have any questions.

Regards,

John P. Laplante, PE
ANCHOR QEA, LLC
jlaplante@anchorqea.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Main 206.287.9130
Direct 206.903.3323

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ANCHOR QEA,LLC
www.anchorqea.com
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[attachment "TCRA Cap Maintenance Plan 01232012.doc.pdf" deleted by Valmichael Leos/R6/USEPA/US]

ATTACHMENT 4

MOBILIZATION, MAINTENANCE, AND DEMOBILIZATION DAILY REPORTS

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	USA Environment, LP	**SUPERINTENDENT**	Ron Griffith
DAY OF WEEK & DATE:	Friday, January 25, 2012	**REPORT NO.**	001
WEATHER	Sunny with slight breeze from the southwest	**TEMPERATURE**	L:58 H:74 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
2 – USA Environment Superintendent and Laborer	
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
Time: n/a Height: n/a	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

0800 - Anchor QEA reviews and discusses approved maintenance plan and USA Environment LP's (USA) proposal.

0830 – Anchor QEA discusses proposal with USA's Project Director.

0900 - W. Mears communicates with local TxDOT representatives, updating them on maintenance activities

1115 – USA is notified to proceed with the approved maintenance plan

1300 to 1600 –USA superintendent Ron Griffith and laborer accomplished the following tasks:

- Verified site security and access
- Marked temporary storage areas on site for rock delivery
- Confirmed locations of Maintenace Area (MA) 1, 2 and 5 with pin flags
- Ordered skid steer and rock transfer trucks for Monday, January 28, 2013
- Ordered geotextile fabric for Monday delivery
- Confirmed stock pile locations and volumes for type C and D rock for maintenance work items

Summary of Progress on this Date:

- Issued Notice to Proceed to Maintenance Contractor, USA Environment LP
- Ordered and confirmed materials, manpower and equipment
- Updated Health and Safety Plan
- Marked maintenance area(s)
- Established site security and access

Persons On-site on this Date:

USA Environment LP superintendent and laborer

ANCHOR QEA

DAILY REPORT

Material Delivery Summary as of this Date:

Material	Units	Delivered 2/01 (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Type C	ton	0	Truck bed measure	0	0
Type D	Ton	0	Truck bed measure	0	0

TESTS PERFORMED:	None

PHONE LOG:
0800 – Discuss proposal with USA Environment
1600 – Discuss mobilization progress with USA

SITE PHOTOS/VIDEOS TAKEN: (attached below)	**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**
None	None

QA REPRESENTATIVE	Wendell Mears	HRS	7	DATE	01/25/2012

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	USA Environment, LP	**SUPERINTENDENT**	Ron Griffith
DAY OF WEEK & DATE:	Monday, January 28, 2013	**REPORT NO.**	002
WEATHER	Sunny with slight breeze from the south	**TEMPERATURE**	L:66 H:78 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
2 – USA Environment & Subcontractors	2 each skid steer (main Site) Front End Loader (aggregate stockpile area) 2 tandem dump trucks delivering aggregate
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
High tide mid-morning, transitioning to low tide at 1820 hrs.	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

0800 – 0900 Pre-construction meeting, review Health & Safety Plan and tailgate meeting near the west gate, north bank.

0900 – 1000 W. Mears on-site at TxDOT right-of-way adjacent to Site for safety and daily work plan briefing by USA Environment, then observed:

- Skid steer delivery
- Hydrographic survey team working in eastern cell area marking Maintenance Area (MA) 4 with buoys
- Temporary stockpile area in southeast corner of Western Cell
- Aggregate delivery, type C

1000 – 1030 Depart Site to inspect aggregate stockpile area access gates.

1030 – 1230 First load of aggregate arrives on-site. Second skid steer delivered. USA marks MA 1 with taller marking flags.

1230 – 1330 Depart Site for lunch.

1330 – 1730 USA installing aggregate on MA 1 using two Skid Steers. Additional rock delivered. Geotextile delivered to Site. Tide levels drop below MA 1 and MA 5 elevations. Mark MA 5 subject to surveyor returning to the Site on Tuesday morning. Geotextile delivered.

Summary of Progress on this Date:

- Mobilized skid steers and aggregate to the Site.
- Mobilized front-end loader to aggregate stockpile area.
- Completed approximately 75% of MA 1.

Persons On-Site on this Date:

Wendell Mears (Anchor QEA)
Phil Slowiak (International Paper)
USA Environment Crew

ANCHOR QEA

DAILY REPORT

Material Delivery Summary as of this Date:

Material	Units	Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	75	Truck bed measure	0	75
Type D	Ton	0	Truck bed measure	0	0

TESTS PERFORMED:	None

PHONE LOG:
Andrew Shafer – discussed fence repairs on south line, east bank.

SITE PHOTOS/VIDEOS TAKEN: (attached below)	**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**
3 photos (descriptions provided underneath photo)	None

FIELD REPRESENTATIVE	Wendell Mears	HRS	9	DATE	01/28/2013

Photograph 1 – Skid Steer carrying Rock Type C to MA 1.

Photograph 2 – Skid Steer returning to temporary stockpile. Pin Flag marking MA 1.

Photograph 3 – Standing on MA 2, looking toward MA 1.

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	USA Environment, LP	**SUPERINTENDENT**	Ron Griffith
DAY OF WEEK & DATE:	Tuesday, January 29, 2013	**REPORT NO.**	003
WEATHER	Overcast, drizzling rain, with winds from the south	**TEMPERATURE**	L:66 H:78 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
3 – USA Environment & Subcontractors 1 – Hydrographic Consultants	2 each Skid Steer (main Site) Front-end Loader (aggregate stockpile area) 2 tandem dump trucks delivering aggregate
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
High tide mid-morning, transitioning to moderate tide at 1820 hrs.	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

0800 – 0900 Pre-construction meeting, review Health & Safety Plan and tailgate meeting near the west gate, north bank. Surveyor on Site.

0900 – 1100 W. Mears on-site at TxDOT right-of-way adjacent to Site for safety and daily work plan briefing by USA Environment, then observed:

- Improving ramp and access using on-site access ramp materials
- Final loads of C rock delivered; D rock delivered
- Preparing to work low tide after 1300 hrs

1115 – 1200 Departed Site for lunch and inspected the fence along I-10 west bank with Andrew Shafer. A new cut through fence was discovered since the previous day.

1200 – 1530 USA installing aggregate on MA 1 using two Skid Steers. Completed M1. Remainder of rock delivered. Tide levels rose due to high winds from the south. Installed pin flags on MA 2 and MA 5, while waiting on better tides. Work was stopped due to gusting winds and increasing tides.

Summary of Progress on this Date:

- Completed aggregate move to temporary stockpile areas in Western Cell.
- Demobilized Front-end Loader from aggregate stockpile area.
- Completed MA 1, started MA 3 and MA 5.
- Planned a longer work day for Wednesday to take advantage of the frontal system and lower tides.

Persons On-Site on this Date:

Wendell Mears (Anchor QEA)
Phil Slowiak (International Paper)
Andrew Shafer (MIMC)
Scott McDonald (Hydrographic Consultants; surveyor)
USA Environment Crew

ANCHOR QEA

DAILY REPORT

Material Delivery Summary as of this Date:

Material	Units	Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	40	Truck bed measure	75	115
Type D	Ton	46	Truck bed measure	0	46

TESTS PERFORMED: None

PHONE LOG:
1300 – Contacted fence company to repair cuts and install additional fabric and wire at two locations.

SITE PHOTOS/VIDEOS TAKEN: (attached below)	**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**
No photos due to inclement weather.	None

FIELD REPRESENTATIVE	Wendell Mears	HRS	10	DATE	01/29/2013

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	USA Environment, LP	**SUPERINTENDENT**	Ron Griffith
DAY OF WEEK & DATE:	Wednesday, January 30, 2013	**REPORT NO.**	004
WEATHER	Overcast, drizzling rain, with winds from the south	**TEMPERATURE**	L:53 H:60 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
3 – USA Environment & Subcontractors 1 – Hydrographic Consultants	2 each Skid Steer (main Site) 1 long reach excavator
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
High tide mid-morning, transitioning to low tide at 0900, then very low at 1200 hrs.	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

0630 – 0730 Prepatory meeting with crew and surveyor, tailgate meeting near the west gate, north bank. Winds out of the WNW at 25 knots, able to work MA 2 and 3.

0730 – 1000 W. Mears on-site working with surveyor to complete flagging MA 2, 3 and 5, then observed and assisted USA Environment:

- Transporting rock to MA 2 and 3.
- USA orders long reach excavator and mats to complete MA 4 during low water event.

1000 – 1045 Departed Site to meet National Fence Co. (NFC) representative to arrange for fence repairs at two locations identified by Anchor QEA and USEPA during inspections. Fabric and/or barbed wire will be extended to ground level, with additional post(s) installed. NFC will advise on schedule and provide photos of repairs.

1045 – 1600 Returned to Site to work with maintenance team. Linkbelt long reach excavator and mats have been delivered and the team works on MA 4 and 5 simultaneously. During the afternoon, sustained wind speeds were greater than 25 knots, pushing enough water off the Site to allow full access to MA 4 and 5.

Summary of Progress on this Date:

- Bridged to MA 4 with long reach excavator on mats.
- Completed locations MA 2, 3, 4, and 5.
- Installed aggregate along overlap joint near NW corner of western berm (see photos).
- Removed all equipment from interior of Site, stacked mats for demobilization.
- Survey completed for all MA's.
- Planned demobilization activities for Thursday morning.

Persons On-Site on this Date:

Wendell Mears (Anchor QEA)
Scott McDonald (Hydrographic Consultants; surveyor)
USA Environment Crew

ANCHOR QEA

DAILY REPORT

Material Delivery Summary as of this Date:

Material	Units	Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	0	Truck bed measure	75	115
Type D	Ton	0	Truck bed measure	46	46

TESTS PERFORMED: None

PHONE LOG:
1000 – National Fence company representative called when he arrived at the maintenance locations along the south alignment, west bank area.

SITE PHOTOS/VIDEOS TAKEN: (attached below)	**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**
Five photographs with captions.	None

FIELD REPRESENTATIVE	Wendell Mears	HRS	10	DATE	01/30/2013

Photograph 1 - Completed MA 2 in foreground, surveyor marking MA 3 in background.

Photograph 2 – Skid Steers transporting rock along central berm, then across MA 2 to MA 3.

Photograph 3 – Skid Steer transporting rock to MA 5.

Photograph 4 – Surveyor checking MA 4 surface before demobilizing long reach excavator.

Photograph 5 – Surveyor checking lap joint maintenance, NW corner western flats. Photograph from atop western berm.

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	USA Environment, LP	**SUPERINTENDENT**	Ron Griffith
DAY OF WEEK & DATE:	Thursday, January 31, 2013	**REPORT NO.**	005
WEATHER	Sunny with slight winds from the south	**TEMPERATURE**	L:37 H:60 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
2 – USA Environment & Subcontractors	
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
Low tide early morning, transitioning to higher tides due to south winds.	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

0800 – 0830 Tailgate meeting near the west gate to discuss load out safety.

0900 – 1130 W. Mears on-site to complete punch list, clear vines and shrubs near signage and observe demobilization of the following equipment:

- USA cleared vines and woody stem vegetation from signage atop central berm.
- Mats loaded and demobilized.
- Linkbelt long reach excavator and two Skid Steers loaded near west gate and demobilized.
- West gate secured.

1130 Called National Fence Co. (NFC) representative for repair date. Was informed that repairs would be completed on or before Tuesday, February 5, 2013, and photographs will be provided to Anchor QEA for verification.

Note: Emailed Vicki Marsh at TxDOT on January 29, 2013 with photos showing evidence of someone living under the eastbound bridge abutment of I-10, east bank. Based on a walk of the area, there have been recent fires build under the bridge and it appears that they have been accessing the site via the small opening between the Coastal Water Authority fence and the I-10 guardrail on the north side (west bound lanes).

Summary of Progress on this Date:

- Cleared vines and shrub growth around two signs atop the central berm.
- Demobilized all equipment.
- Confirmed fence repair date.
- Secured the site and departed.

Persons On-Site on this Date:

Wendell Mears (Anchor QEA)
USA Environment Crew

ANCHOR QEA

DAILY REPORT

Material Delivery Summary as of this Date:

Material	Units	Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Type C	Ton	0	Truck bed measure	0	115
Type D	Ton	0	Truck bed measure	0	46

TESTS PERFORMED: None

PHONE LOG:
1130 – National Fence company representative called to confirm repair date.

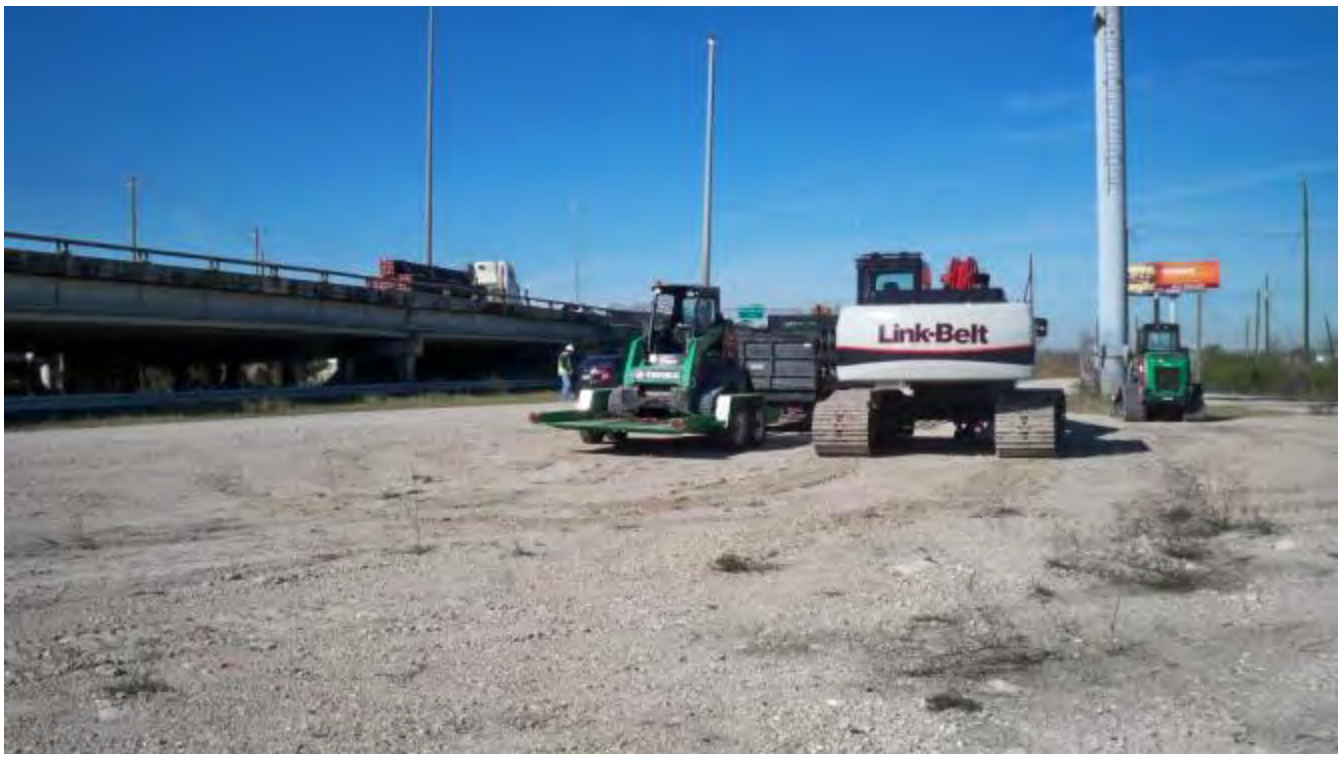
SITE PHOTOS/VIDEOS TAKEN: (attached below)	**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**
Nine photographs with captions.	None

FIELD REPRESENTATIVE	Wendell Mears	HRS	3.5	DATE	01/31/2013

Photograph 1 – Demobilizing mats.

Photograph 2 – Vines removed from signage on central berm.

Photograph 3 – Woody stem vegetation cleared from signage on central berm.



Photograph 4 – Skid Steer loaded for demobilization near west gate.

Photograph 5 – Linkbelt excavator demobilized from site.

Photograph 6 – MA 5 photo from atop the southern berm.

Photograph 7 – MA 1 and 2 and showing access lane to MA 2 and 3. MA 3 in the distance.

Photograph 8 – From atop the central berm, looking southeast. Access route to MA 4 in foreground.

Photograph 9 – From atop the western berm, looking north and east. Small maintenance area near water's edge.

ANCHOR QEA

DAILY REPORT

PROJECT	San Jacinto River Waste Pits TCRA Maintenance	**CONTRACT NO.**	
CONTRACTOR	National Fence Company	**SUPERINTENDENT**	John Burns
DAY OF WEEK & DATE:	February 5 and 6, 2013	**REPORT NO.**	006
WEATHER	Overcast with intermittent rain	**TEMPERATURE**	L:56 H:67 degrees F

NUMBER/CLASS OF CONTRACTOR'S PERSONNEL:	**MAJOR EQUIPMENT ON JOB (Size/capacity and hours):**
3 – National Fence	Fence Repair Truck along perimeter
TIDE INFORMATION:	**HEALTH AND SAFETY INFORMATION:**
N/A	No incidents or near misses on this date.

CHRONOLOGICAL ACCOUNT OF DAY'S WORK:

February 5, 2013

1400 - 1630 – After safety and scope briefing, crew cleared repair areas and drove short pipe sections along 3 panels, south fence alignment, west bank of the San Jacinto River. Replaced cut fence panel section, started barb wire installation. Measure damaged gate center post for replacement.

February 6, 2013

1000 – 1330 – Completed barb wire installation. Installed new gate center post, east bank access. Took photographs repairs and departed Site.

Summary of Progress on this Date:

- Repaired cut fence fabric
- Installed additional mid panel posts and barb wire
- Replaced damaged gate center post
- All maintenance items complete

Persons On-Site on this Date:

National Fence Crew along perimeter.

Material Delivery Summary as of this Date:

Material	Units	Delivered (units)	Delivery Verification Method	Preceding Delivered Total	Total Delivered for Project
Fencing	LS	1	Photographs	0	1

TESTS PERFORMED:	None

ANCHOR QEA

DAILY REPORT

PHONE LOG: 1230 – National Fence company representative notified Wendell Mears of completed repairs, followed by emailed photographs.					
SITE PHOTOS/VIDEOS TAKEN: (attached below)		**FORCE ACCOUNT WORK/ CHANGES ENCOUNTERED:**			
Five photographs with captions.		None			
REPRESENTATIVE	Wendell Mears	HRS	0	DATE	02/06/2013

Photograph 1 – Repaired fence fabric, south alignment, west bank of the San Jacinto River I-10 crossing

Photograph 2 – Added posts and barb wire closures, south fence alignment, west bank.

Photograph 3 – Added barb wire and fence supports to prevent access, south fence line, west bank.

Photograph 4 – Added lower supports on adjacent panels to secure fence fabric and barb wire.

Photograph 5 – New gate center post installation, east bank. All fence maintenance actions complete.