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MEMORANDUM

To:	Valmichael Leos and Anne Foster U.S. Environmental Protection Agency	**Date:**	May 4, 2015
From:	John Laplante, John Verduin, Wendell Mears, and David Keith, Anchor QEA	**Project:**	090557-01
Cc:	Gary Miller, USEPA Philip Slowiak, IP David Moreira, MIMC		
Re:	Post-TCRA Visual Inspection Report – April 2015		

Introduction

This document reports the results of the April 2015 visual 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, Respondents' Project Coordinator, received a RACR (in the form issued by USEPA) from Valmichael Leos via email on August 15, 2012; however, the appendices to the RACR including the OMM Plan, were not provided to Dr. Keith as part of the document. The OMM Plan had been previously approved by USEPA (in an email from Mr. Leos dated January 18, 2012) and is assumed to remain unchanged. Respondents

The visual inspection summarized in this report was conducted on behalf of MIMC and IP to supplement the semi-annual inspections required in the schedule that is 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, fencing, and signage installed for the TCRA Site. The first semi-annual visual inspection in 2015 was initiated in January 2015 (Anchor QEA 2015); however, the completion of the January 2015 hydrographic survey was delayed due to seasonal low tides and northerly fronts that prevented water access over the cap along the east edge and northeast quadrant of the TCRA Site. These areas were unsafe to walk on and perform the survey due to depositional muds, algae, and shellfish growth. Surveying by water was not possible because of the persistent low tide conditions that occurred during the latter part of January through March 2015. The Respondents' Project Coordinator notified Valmichael Leos of these conditions on January 30, 2015, and as agreed to with Mr. Leos, the survey was completed at the first available date where it could be done in a safe manner, which was on April 8, 2015.

Quarterly visual inspections are not required in the OMM Plan; however, voluntarily and pursuant to discussions with USEPA, MIMC and IP plan to continue visual inspections on a quarterly basis as part of their continuing efforts to monitor and maintain the armored cap and other components of the TCRA.

Visual Inspection

The purpose of this report is to document the April 2015 visual inspection of the armored cap cover, fencing, and signage installed as part of the TCRA, as well as corrective actions

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.

[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.

taken (if any), following the inspection. The inspection, which took place on April 9, 2015, included evaluation of the TCRA elements referenced below:

- Inspection of the security fence and signage surrounding the TCRA Site
- Inspection of the armored cap that was visible above the water line of the San Jacinto River

Photographs of conditions observed during the visual inspection are provided in Appendix A (Figures A-1 to A-4). 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 3 through 10). Due to a high tide, the majority of the Eastern Cell armored cap was underwater. All of the visible portions of the armored cap were observed to be intact, and no movement of cap materials was observed at any location during the visual inspection. Grassy and occasionally woody vegetation was observed around much of the armored cap perimeter.

Perimeter Fencing

The perimeter fencing on the west and east banks of the San Jacinto River was visually inspected for breaches or other signs of damage. No breaches or other signs of fence damage were observed during the 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. For examples, see Photographs 1, 2, 11 through 14, and 16 in Appendix A.

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 the SJRF property is currently occupied by 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.

In the east bank area south of I-10 there was evidence of continued access and construction for offloading per the Linde agreement with the USEPA, TxDOT, and the Respondents. At the time of inspection the east and west bank gates were secured.

Signage

"Danger" and "No Trespassing" signs are posted at regular intervals on the perimeter fencing surrounding the TCRA Site. For examples, see Photographs 11 through 13 in Appendix A. These signs were observed to be in place during the April 9, 2015 inspection.

A total of fifteen 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 3 through 7, 9, and 10 in Appendix A. These signs are intended to face the San Jacinto River to deter water-based entry to the TCRA Site. A few 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 examples, see Photographs 1~~,~~ and 14 in Appendix A. These three signs were observed to be in place and undamaged.

Signage on all locked gates reminds entrants to "daisy chain" the locks properly prior to leaving the TCRA Site. For an example, see Photograph 2 in Appendix A. These 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	Yes	4/9/2015

Task	Status	
	Completed	Date
Visually inspect the perimeter fencing on the east and west sides of the San Jacinto River.		
"Danger" and "No Trespassing" Signs Visually inspect the 15 signs to verify that they remain in place.	Yes	4/9/2015
USEPA Public Notice Signs Visually inspect the 3 signs to verify that they remain in place.	Yes	4/9/2015
Daisy Chain Signs Visually inspect the 2 signs to verify that they remain in place.	Yes	4/9/2015

Inspection Summary

The visual inspection event on April 9, 2015 did not identify damaged areas in the perimeter fence or signage and the armored cap remains intact.

List of Appendices

Appendix A – Inspection Photographic Log

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.

Anchor QEA, 2015. *Post-TCRA Semi-Annual Inspection Report – January 2015 Inspection.* 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. April 2015.

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.

APPENDIX A
INSPECTION PHOTOGRAPHIC LOG

Photograph 01: USEPA public notice sign located outside the access gate north of I-10 (view east)

Photograph 02: Access gate and "daisy chain" locking method notice north of I-10 (view east)

Photograph 03: Warning signs and vegetation along southern berm (view east)

Photograph 04: Western Cell (view northwest)

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Figure A-1
Site Photographs
Post-TCRA Inspection Report (April 2015)
San Jacinto River Waste Pits Superfund Site

Photograph 05: Warning sign and USEPA public notice sign located at eastern edge of southern berm (view southwest)

Photograph 06: Southern berm and Eastern Cell (view northwest)

Photograph 07: Warning signs along central berm (view north)

Photograph 08: Eastern Cell and warning buoy along the perimeter (view northeast)

Figure A-2
Site Photographs
Post-TCRA Inspection Report (April 2015)
San Jacinto River Waste Pits Superfund Site

Photograph 09: Warning sign and vegetation along western berm (view north)

Photograph 10: Warning sign along western berm (view east)

Photograph 11: Signage and perimeter fencing south of I-10 on west bank (view northeast)

Photograph 12: Signage and perimeter fencing south of I-10 on west bank (view northeast)

Figure A-3
Site Photographs
Post-TCRA Inspection Report (April 2015)
San Jacinto River Waste Pits Superfund Site

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Photograph 13: Signage and perimeter fencing south of I-10 on west bank (view north)

Photograph 14: USEPA public notice sign located south of I-10 (view north)

Photograph 15: Fish consumption advisory signs south of I-10 on west bank (view south)

Photograph 16: Perimeter fencing south of I-10 on east bank (view northwest)

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Figure A-4
Site Photographs
Post-TCRA Inspection Report (April 2015)
San Jacinto River Waste Pits Superfund Site

Photograph 17: Warning sign south of I-10 on east bank (view south)

Figure A-5
Site Photographs
Post-TCRA Inspection Report (April 2015)
San Jacinto River Waste Pits Superfund Site