ANCHOR QEA

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March 15, 2013

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto River Waste Pits Superfund Site
Monthly Progress Report No. 40 February 2013/March 2013;
U.S. EPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS

Project Number: 090557-01

Dear Mr. Miller:

Attached please find the Monthly Progress Report No. 40 for February 2013/March 2013. This report was prepared on behalf of the International Paper Company and McGinnes Industrial Maintenance Corporation for the San Jacinto River Waste Pits Superfund Site in Channelview, Texas. Should you have any questions, please contact me at (228) 818-9626 or email me at dkeith@anchorqea.com.

Sincerely,

David C. Keith

David C. Keith
Project Coordinator

cc: Steve Tzhone, USEPA
Barbara Nann, USEPA
Phil Slowiak, International Paper
David Moreira, MIMC
Jennifer Sampson, Integral

Attachments

DCK/tlf

**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**

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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

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.

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## 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 | |

**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 |
|---|---|---|---|---|
| 1/22/2010 | 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. | |

**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 |
|---|---|---|---|---|
| 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. |

**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 |
|---|---|---|---|---|
| 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<br>8/26/2010 | Email from B. Nann forwarding edits to RI/FS work plan.<br>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 | | |

**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 |
|---|---|---|---|---|
| 8/17/2010 | Submitted revised response to comments on the Fate and Transport Sampling and Analysis Plan | 8/31/2010<br>9/7/2010 | Email from S. Tzhone approving the revised response to comments and authorizing submittal of the Final Draft document.<br>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. | |

**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 |
|---|---|---|---|---|
| 9/10/2010 | 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. | |

**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 |
|---|---|---|---|---|
| 9/30/2010 | 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 | |

**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 |
|---|---|---|---|---|
| | | 10/29/2010 | 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 | | | |

**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 |
|---|---|---|---|---|
| 11/15/2010 | 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<br>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 | | | |

**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 |
|---|---|---|---|---|
| 1/14/2011 | 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 | | | |

**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 |
|---|---|---|---|---|
| 3/11/2011 | 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 | |

**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 |
|---|---|---|---|---|
| 4/7/2011 | 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 | |

**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 |
|---|---|---|---|---|
| | | 4/29/2011 | 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:<br><br>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 | | | |

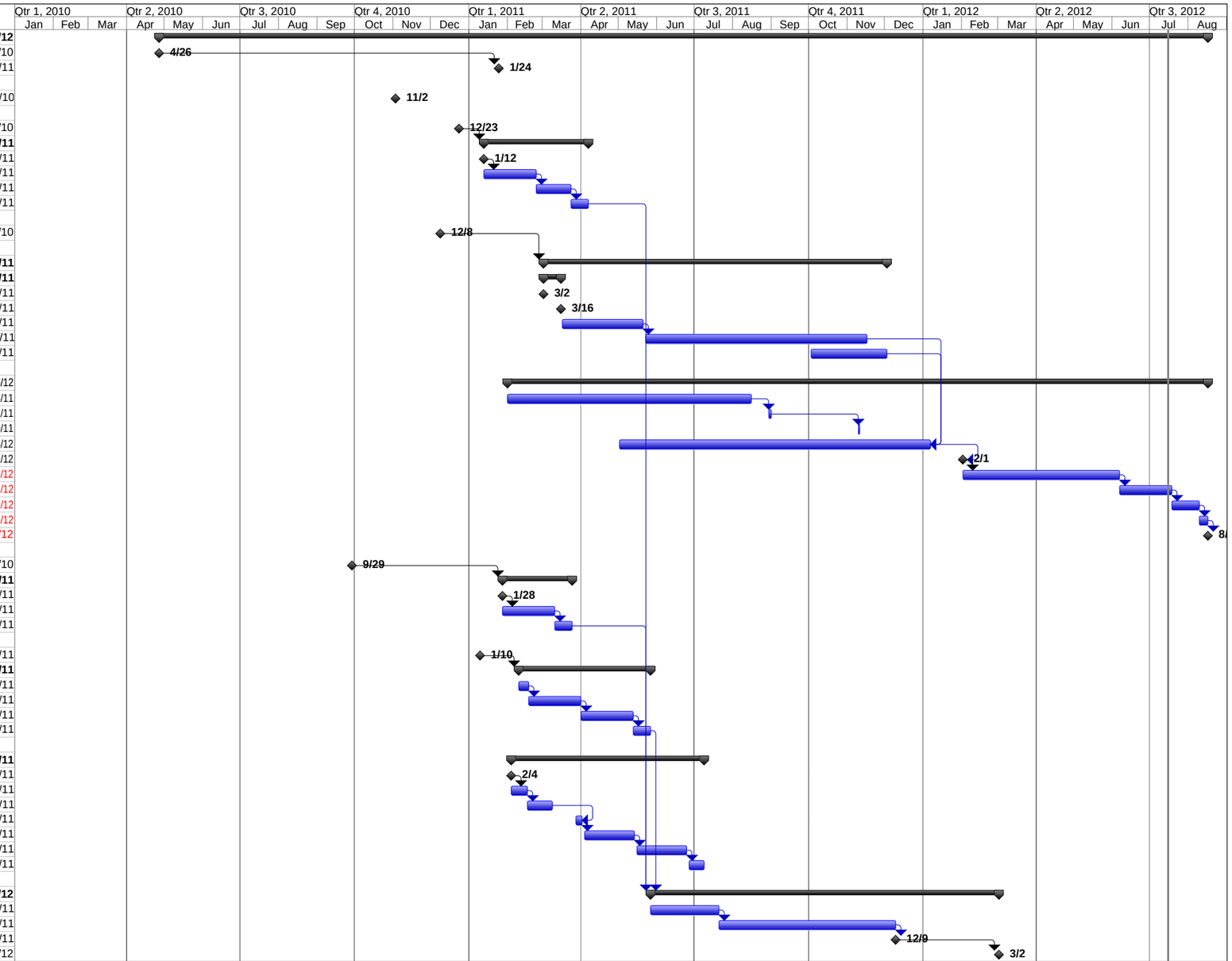
**Table 1**
**Summary of Agency Communication**
**San Jacinto River Waste Pits Superfund Site**

| 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:<br>• Field Sampling Report: 2011 – 2012 Sediment Study<br>• Field Sampling Report: 2011 Tissue Study<br>• Field Sampling Report: 2012 Soil Study<br>• Field Sampling Report: TCRA Cap Porewater Assessment<br>• 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. |

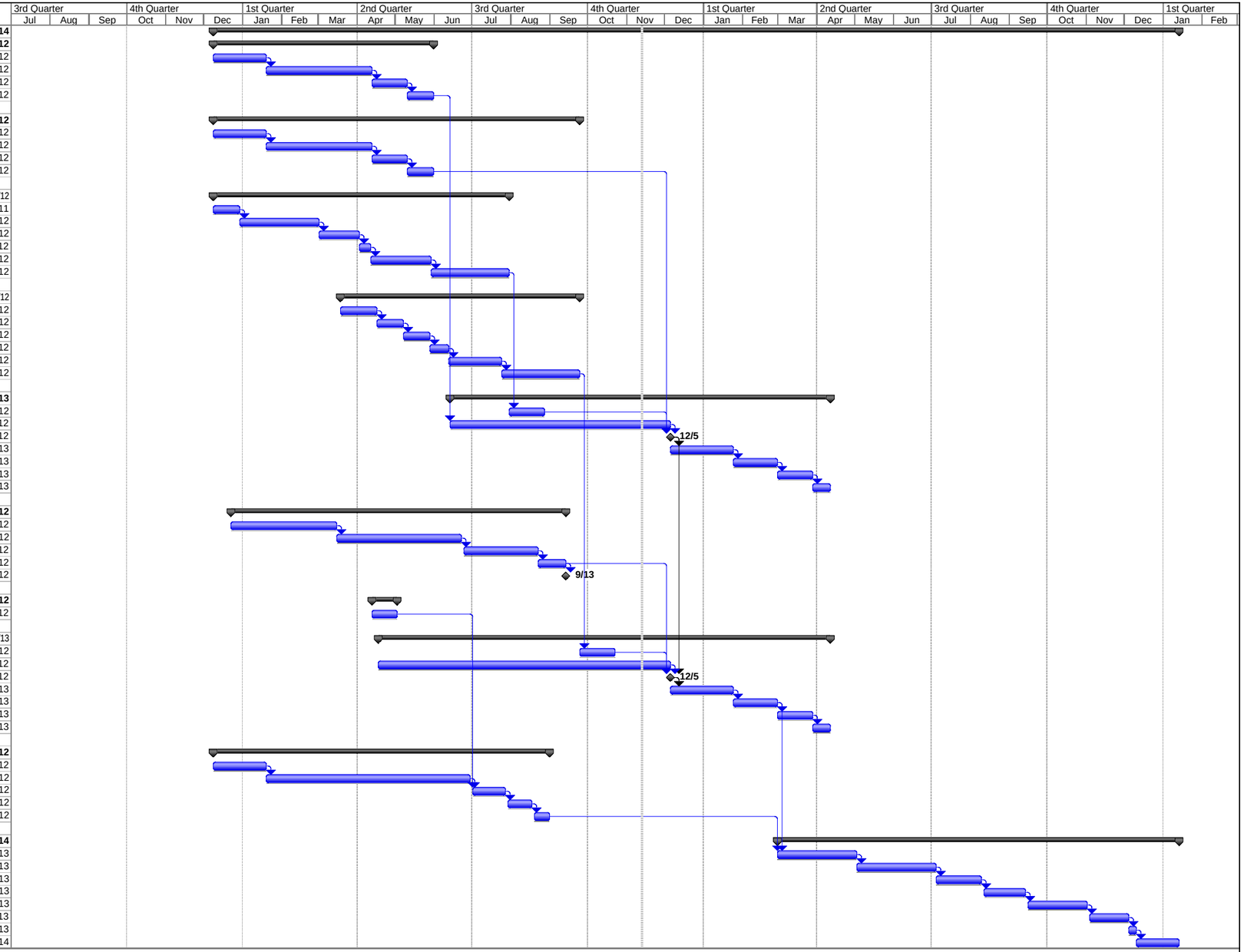
| ID | Task Name | Duration | Start | Finish |
|---|---|---|---|---|
| 1 | **Preliminary Site Characterization Report Studies and Preparation** | **604 days** | **Mon 4/26/10** | **Thu 8/16/12** |
| 2 | **EPA Approval San Jacinto Sediment Sampling and Analysis Plan** | 0 days | Mon 4/26/10 | Mon 4/26/10 |
| 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 | Submittal 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 | Milestone | Project Summary | External Milestone | Deadline
Split | Summary | External Tasks | Progress