UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 2 1 2015

VIA CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

David C. Keith
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39564

RE: Failure to Submit Cap Repair Plan
Administrative Settlement Agreement and Order on Consent for Removal Action, CERCLA Docket No. 06-12-10
San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas

Dear Mr. Keith:

The Environmental Protection Agency (EPA) is hereby notifying you as Respondents' Project Coordinator that Respondents McGinnes Industrial Maintenance Corporation and International Paper Company (hereinafter referred to as Respondents) have failed to submit a cap repair plan as required by the Operations, Monitoring, and Maintenance Plan for the San Jacinto River Waste Pits Superfund Site by December 21, 2015. It is imperative that EPA receive this plan no later than December 22, 2015, in order for a timely response action at the site.

The EPA is extremely disappointed that you were unable to submit the repair plan in a timely manner. It is critical that the displaced rock area discovered by the EPA Dive Team on December 10, 2015, be repaired at an early date to prevent the potential continuing release of dioxin containing material into the San Jacinto River. As you are aware, the San Jacinto River already has a fish advisory in place due to the presence of dioxin, PCBs, and pesticides in the fish tissue, and any potential continuing release from the waste pits will only make the situation worse.

To expedite this repair work, the EPA is providing notice that mobilization for the repair shall begin no later than January 10, 2016, using a repair work plan that has been approved by EPA. The work shall include the following:

1. Collection of four surface sediment samples within the rock displacement area and analysis for the dioxin and furan congeners.
2. Delineation of the rock displacement area.
3. Identification of the current location of the displaced rock material.
4. Provision for installation of a geomembrane layer below the replacement armor rock material.
5. Installation of armor rock material in accordance with the U.S. Army Corps of Engineers specifications.

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6. Armor rock layer to be a minimum of 18-inches thick.
7. Installation of pore-water samplers in conjunction with the pore-water sampling planned for the rest of area.
8. Review and modification of the Operation, Monitoring, and Maintenance plan.

Sincerely yours,

Carl E. Edlund, P.E.
Director
Superfund Division