December 22, 2015

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Work Plan for Rock Placement on the Time Critical Removal Action Armored Cap
San Jacinto River Waste Pits Superfund Site, Harris County, Texas

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed a review of the above referenced document dated December 21, 2015. With this letter, the EPA approves the Work Plan for Rock Placement with the enclosed modifications, which shall be incorporated in the Final Work Plan for Rock Placement and submitted to EPA no later than December 28, 2015.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller
Remedial Project Manager

Enclosure

cc: Satya Dwivedula (TCEQ)
Bob Allen (Harris County)
Linda Henry (Port of Houston)
Angela Sunley (TGLO)

9753100

Comments
Draft Work Plan for Rock Placement on the Time Critical Removal Action Armored Cap

1. The Work Plan uses the phrase "a small area" that requires the placement of rock material. The size of this area is currently unknown and will be determined during the delineation program. The word "small" shall be deleted.
2. The Work Plan shall include specific information on the underwater placement methods of the geotextile fabric and rock. Information shall also be provided on the plan to anchor the geotextile since the adjacent areas are armored. It may be necessary to place rock from the bottom of the slope and work up due to slope.
3. The Work Plan shall include specific information on ensuring the accurate underwater placement of the fabric and rocks.
4. The Work Plan shall include specific information on how repair will be secured to prevent sliding down the slope. The Work Plan shall also describe the slope in and around the repair area.
5. The Work plan shall include specific information on the removal of rock already in place should that be included in the plan. If no rock removal is planned, the Work Plan shall state that.
6. Several references are made to the "TCRA Site". The San Jacinto River Waste Pits Site is defined as the "Site" in the beginning of the Work Plan. The Work Plan shall use a consistent meaning for "Site" for clarity.
7. On page 3, the Work Plan describes probing to determine any location in which cap material "at the specific thickness…" is not present. The Work Plan shall provide this specific thickness value to ensure clarity of intention.
8. A minimum of three additional sediment samples shall be collected outside of the work area to address the concern that this may have led to a release of contaminants outside of the repair area.
9. The Work Plan shall include actions to check the toe of the steep slope area for any indication of a buildup of armor rock there that may have occurred as a result of a slump/slide of the armor rock.
10. The Work Plan shall consider providing for the inclusion of a gravel filter material mixed with the armor stone as was done for areas where the geotextile was not placed. Should the repair area extend downslope to the steeper area, the use of filter material will be needed because geotextile use there may not be appropriate as described in the original armor cap construction plan/report.