UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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DALLAS TX 75202-2733

JAN 29 2016

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

RE: Draft Addendum 3 to the Sediment Sampling and Analysis Plan (SAP)
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed reviews of the above referenced document dated October 23, 2015. The enclosed comments shall be incorporated in the Final Addendum 3 to the Sediment Sampling and Analysis Plan and copies provided for approval within 30 days of receipt of this letter.

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,

Carlos A. Sanchez
for Gary Miller
Remediation Project Manager

Enclosure

cc: Satya Dwivedula (TCEQ)
Bob Allen (Harris County)
Linda Henry (Port of Houston Authority)
Angela Sunley (Natural Resource Damage Assessment Trustee Program, TGLO)

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Comments
Draft Addendum 3 to Sediment the Sampling and Analysis Plan (SAP), dated October 23, 2015

1. On page 4 and page 5, the SAP includes a discussion of barging operations in the vicinity of the San Jacinto River Waste Pits Superfund Site (Site). The SAP mentions one operator, but not others operating barges in the area. The SAP shall identify other barge operators who are operating in the San Jacinto River near the Site in addition to the one described. The SAP also describes the re-distribution of sediment as evidenced by burial of the instrument used for the sediment transport study. The SAP shall include the distance of this buried instrument from the waste pits and from the river bed near the sand separation area. Finally, the previous modelling study identified various areas of the Site as being either sediment depositional or erosional areas. The SAP shall also discuss this additional source of sediment re-distribution in the area around the northern impoundments, and include this in the discussion on uncertainty.
2. Figures 2 and 3: These figures include the sediment sample locations surrounding the outside of the waste pits. These figures shall also include the sediment or soil sample locations under the cap around the perimeter that are nearest to the inside edge of the cap.
3. Sediment variability often occurs at a fine spatial scale. The SAP shall include a discussion of why the proposed statistical analysis is adequate and why replicate sampling of fine-scale spatial sediment variability is not appropriate to support any conclusion that observed differences are due to temporal changes rather than spatial and random variability.
4. Under the paragraph "Analytical Approach", a statement is made that the laboratory offers higher resolution analysis. The SAP shall clarify if this refers to chromatographic separation or something else.
5. The SAP does not indicate any standard analytical methods. The SAP shall identify the analytical methods to be used, which shall be consistent with previous analytical methods for sediment.
6. The text and tables in the document indicate that grain size will be analyzed, but do not give the specific method. The attachments to SAP Addendum 3 include ALS Standard Operating Procedure for Particle Size Determination. The SOP includes 2 procedures based on ASTM D-422 Modified and 2 procedures based on Puget Sound Estuary Program procedures. The ASTM D-422 Expanded Version shall be used, which will provide the distribution of silt and clay size particles. Further, the lab shall be required to report water content or percent moisture for each sample.