ANCHOR QEA

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March 21, 2015

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

Dear Gary:

This letter provides a summary of the inspection of the armored cap at the San Jacinto River Waste Pits Superfund Site (Site) described in a letter to you dated March 14, 2016, and approved by you on March 15, 2016. The inspection consisted of probing over the eastern cell of the armored cap on March 16, 17, 18, 19, and 21, 2016. A visual inspection of the armored cap was also performed during an extreme low tide event on Saturday, March 19, 2016, along with additional probing for Quality Assurance/Quality Control purposes.

The results of the probing and visual inspection identified several discrete areas (e.g. 1' x 1') where geotextile was exposed, as summarized in Table 1 and shown on the attached Figure 1.

Placement of Geotextile and Armor Rock

Armor rock will be placed over each maintenance location shown on Figure 1 to assure that the design thickness of armor rock is present at all locations. As part of the Time Critical Removal Action planning for cap maintenance, two stockpiles of armor rock (armor rock C and armor rock D) were purchased and staged near the Site, and armor rock C will be used for this maintenance activity. Armor rock C is larger than or equivalent to the size of the

armor rock used in these locations of the armored cap, and it will provide long-term reliability of the cap surface from currents, winds, and waves in the area.

As you are aware, a skid steer front-end loader became disabled on the armored cap and the Respondents will place additional geotextile and armor rock in this area. In addition, the geotextile edge identified at Location 11 will also be addressed by placement of geotextile and armor rock.

Work will be conducted by the Respondents' on-call contractor, USA Environment, LP (USA), and Benchmark Ecological Services. Access to the Work Areas from the land side is necessary due to shallow water conditions. Work will be conducted as follows:

- We believe there is currently sufficient armor rock C on the stockpile area at the entrance to the cap to complete the required maintenance; however, additional rock will be delivered if needed. Rock will be delivered using dump trucks to the stockpile area at the southeastern entrance to the armored cap outside of the TxDOT right-of-way.
- Small equipment will be used to move rock from the delivery location to the shoreline near the Work Area.
- The rock will be transferred from the stockpile into the Work Areas using a small pontoon boat and unloaded from the pontoon boat over the Work Areas to attain the design thickness of armor material. This process is similar to the process that was used for maintenance activities performed in the eastern cell the week of March 14, 2016.

The construction duration is estimated to be 1 to 2 days.

Schedule

With the U.S. Environmental Protection Agency's approval of this Work Plan, we plan to mobilize and complete the maintenance work on March 22 and 23, 2016, assuming weather, tide, and access conditions allow those activities. Please do not hesitate to contact me if you would like to discuss anything.

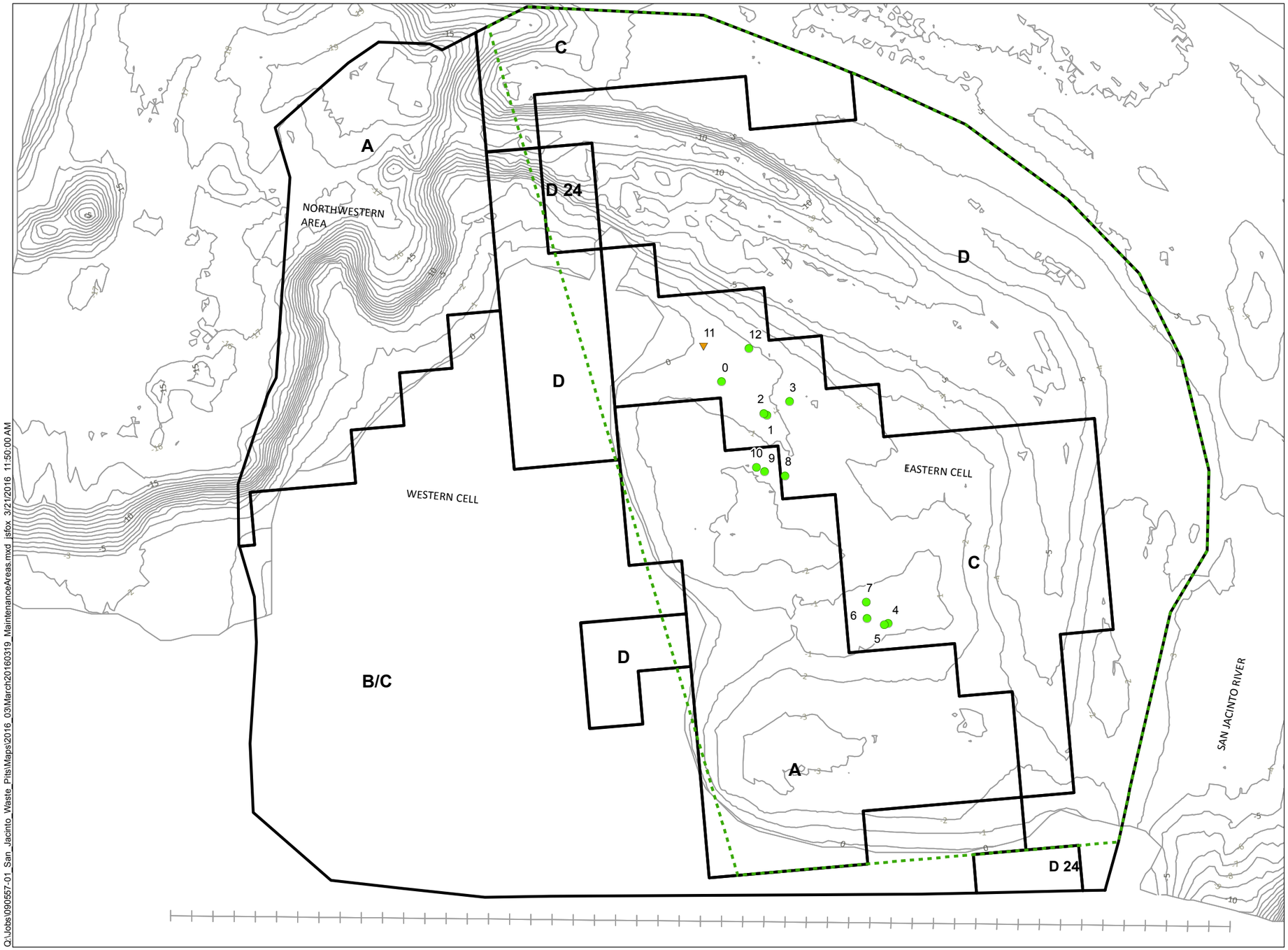
Sincerely,

David C. Keith
Project Coordinator
Anchor QEA, LLC

cc: Phil Slowiak, International Paper Company
Dave Moreira, McGinnes Industrial Maintenance Corporation
John Laplante, Anchor QEA, LLC

Table 1
Armored Cap Maintenance Locations
March 2016

Maintenance Location	Comment	X (UTM NAD83 - 15N)	Y (UTM NAD83 - 15N)	Maintenance Plan
0	Exposed Geotextile with rock beneath. Indicative of Lap Joint.	300665.5156	3297847.47	Add rock
1	Exposed Geotextile is 2x2 feet. Some rock aggregate present. Thin cap rock region is 2x6 feet.	300672.5976	3297832.841	Add rock
2	Exposed geotextile 2x2 feet in area. Some rock aggregate present.	300672.013	3297833.713	Add rock
3	Exposed Geotextile 2x3 feet in area. Some rock aggregate present.	300680.1521	3297833.27	Add rock
4	Exposed Geotextile is 1x3 feet in area. Some rock aggregate present.	300675.29	3297763.589	Add rock
5	Exposed Geotextile is 1x1 feet in area. Some rock aggregate present.	300674.1382	3297763.769	Add rock
6	Exposed Geotextile is 1x1 feet in area. Some rock aggregate present.	300670.6068	3297767.763	Add rock
7	Exposed Geotextile is 1x1 feet in area. Some rock aggregate present.	300672.5902	3297771.977	Add rock
8	Exposed Geotextile is 2x1 feet in area. Some rock aggregate present.	300668.9628	3297815.019	Add rock
9	Exposed Geotextile is 1x1 feet in area. Some rock aggregate present.	300664.2992	3297818.844	Add rock
10	Exposed Geotextile is 2x2 feet in area. Some rock aggregate present.	300662.8045	3297821.023	Add rock
11	Exposed Geotextile, cause unknown. Some rock aggregate present. Possible joint.	300665.6821	3297858.861	Add rock and geotextile
12	Centroid for area of exposed geotextile and thin cap rock. Some rock aggregate present. 20 square feet of area total.	300676.9607	3297852.277	Add rock



LEGEND

Pre-Construction Contour, February 15 and 21, 2011 (1-foot interval)

Proposed New Probing Survey Boundary

Observations 03/19/2016

Maintenance Point and ID - Add geotextile and rock

Maintenance Point and ID - Add Rock

Feet

0 50 100 150 200

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Figure 1
March 2016 Maintenance Areas
San Jacinto Waste Pits Superfund Site