

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 31, 2021

Transmitted via email

Mr. Kevin Peterburs
Manager, Environmental Site Remediation
Union Pacific Railroad
4823 N 119th Street
Milwaukee, WI 53225

Re: Comments on *Proposed City of Houston Storm Water Sewer Assessment Work Plan (Work Plan)*, dated July 12, 2021
Union Pacific Railroad (UPRR) Houston Wood Preserving Works Facility
4910 Liberty Rd., Houston (Harris County)
TCEQ SWR No. 31547; CN600131098; RN100674613
TCEQ Permit No. 50343; EPA ID No. TXD000820266

Dear Mr. Peterburs:

The Texas Commission on Environmental Quality (TCEQ) has completed review of the above-referenced Work Plan and has the following comments:

1. A minimum of two additional monitor wells should be installed next to the Storm Drain in proximity to the A-TZ monitor wells containing non-aqueous phase liquid (NAPL) along the northern and eastern property boundary.
2. In addition to comparison to the Texas Risk Reduction Program protective concentration levels, the results of water samples collected to from the storm drain should also be compared to the Texas Surface Water Quality Standards to determine if discharges from the storm drain could result in exceedances of these standards at the point of discharge.
3. The Work Plan indicated that the "TCEQ stated during the April 22nd conference call that the TCEQ had concluded that there were no signs of NAPL entering the storm sewer based on the TCEQ's review of the COH survey presented in the UPRR CCTV Presentation.pdf file." Please note that the TCEQ's comment indicated that we did not see direct evidence of a connection between the NAPL at the site and the City's observations in the storm drain, but that additional assessment was required to determine if a connection was present.

Please submit a final version of this Work Plan that incorporates the above changes **within 30 days of the date of this letter.**

Please note that it is the continuing obligation of persons associated with a site or facility to ensure that industrial solid waste and/or municipal hazardous waste are

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

Mr. Kevin Peterburs
Page 2
August 31, 2021
TCEQ SWR No. 31547

managed in such a way that it does not cause a discharge of waste or an imminent threat of discharge, nor a nuisance or an endangerment to either human health or the environment as required by 30 TAC §335.4. Be advised that the burden remains upon the owner to take necessary and authorized action to correct such conditions whenever they exist.

Questions concerning this letter should be directed to me at (512) 239-2034. When responding by mail, please submit one paper copy and one electronic copy (on USB or disc) of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted in electronic format to the local TCEQ Region Office. Note that the electronic and hard copies should be identical, complete copies. A Correspondence ID Form (TCEQ Form 20428) must accompany each document submitted to the Remediation Division and should be affixed to the front of your submittal. The information in the reference block should be included in all submittals.

Sincerely,



Maureen Hatfield, P.G., Project Manager
VCP-CA Section, Remediation Division
Texas Commission on Environmental Quality

MMH/mmh

cc: Ms. Alma Jefferson, TCEQ, Waste Section Manager, Houston Regional Office, MC-R12 (email)
Mr. Eric Matzner, Golder Associates Inc., (email)