



April 27, 2023

Project No. 31404514.014

Ms. Maureen Hatfield

MC-127

VCP-CA Section, Team 1, Remediation Division

Texas Commission on Environmental Quality

P.O. Box 13087

Austin, Texas 78711-3087

**NOTIFICATION OF SOIL SAMPLING ACTIVITIES AT THE UNION PACIFIC RAILROAD HOUSTON WOOD PRESERVING WORKS FACILITY, 4910 LIBERTY ROAD FACILITY, HOUSTON, TEXAS
POST-CLOSURE CARE PERMIT NO. HW-50343; INDUSTRIAL SWR NO. 31547**

Dear Ms. Hatfield,

WSP USA Inc. (WSP), on behalf of Union Pacific Railroad Company (UPRR), is providing this notification of proposed soil sampling activities at the Houston Wood Preserving Works Facility (the Site) (IHW Permit 50343) in accordance with the RCRA Permit, Compliance Plan, Section XII. The sampling activities are being conducted to support characterization and waste classification for disposal of soils anticipated to be generated during the proposed Englewood Yard Expansion - Phase 3 project (the Project).

A portion of the proposed construction area for the Project is located in the former Englewood Intermodal Yard within the boundary of the Site. The preliminary areas within the Site to be disturbed include portions of the Railroad Ballast Cap Area and Concrete Ballast Cap Area, as shown on Figure 1. Soils generated during construction activities in the areas will be classified depending on the results of the soil sampling discussed below. The objective of the sampling plan is to evaluate the presence of chemicals of concern (COCs) for developing a Soil Management Plan (SMP) for the Project. The SMP will include an evaluation for waste characterization and classification for disposal of soils that will potentially be generated during the Project construction activities.

Per the Response Action Plan (RAP) Revision No. 7 dated January 15, 2020, UPRR will provide notification to the Texas Commission on Environmental Quality (TCEQ) and inform the public of planned construction activities when those activities disturb the capped areas at the Site. UPRR will submit to the TCEQ, as part of the required construction notification, the SMP that will include the soil testing results from samples collected following the sampling plan detailed below. The construction notification will also include details of the conceptual design of the planned construction activities, details on how the disturbed caps will be repaired, schedule of planned construction activities, and environmental monitoring plans that will be submitted to the TCEQ as required per the RAP.

Sampling Plan

WSP proposes to collect soil samples at 65 proposed locations as shown on Figure 1. The total depth of each boring will be approximately 5 feet below ground surface (bgs) or below the bottom of the existing concrete slab, concrete cap, ballast cap, or asphalt, where applicable. Soil samples will be collected and composited from the proposed soil borings across the total depth of the boring using hand auger or direct push sampling techniques. WSP's field staff will log soils from the borings to the extent practical to describe the lithology surrounding each location. A portion of the soils sampled from each logging location will be placed in a re-sealable plastic bag, and field screened for headspace organic vapor concentrations using a photoionization detector (PID).

Soil samples will be submitted to a laboratory and analyzed for the following COCs:

- Volatile Organic Compounds (VOCs) by SW-846 Method 8260;
- Semi-Volatile Organic Compounds (SVOCs) by SW-846 Method 8270;
- Total Petroleum Hydrocarbons (TPH) by Texas Method 1005;
- RCRA Metals by SW-846 Methods 6000/7000 series;
- Toxicity Characteristic Leaching Procedure (TCLP) EPA Method 1311, as needed; and
- pH by EPA Method 9045.

Soil samples will be collected in laboratory-supplied containers and placed on wet ice in an insulated cooler to reduce and maintain sample temperature at 4 ± 2 degrees Celsius. A chain-of-custody record will accompany the samples through receipt at the Pace Analytical National Center for Testing & Innovation Laboratory located in Mount Juliet, Tennessee.

In addition to the soil sampling locations, a UPRR Engineering contractor will advance seven geotechnical borings (shown on Figure 1) within the Site to support the Project design. Geotechnical borings will be advanced utilizing a truck-mounted drill rig to a maximum depth of 30 feet bgs. Other disturbance activities may include potholing for utilities as part of the subsurface utility evaluation (SUE) for the design and utility coordination process; however, the SUE plans are currently being developed.

The soil sampling and geotech boreholes will be plugged from the bottom of the hole to ground surface using bentonite hole plug or Portland-bentonite grout. At the locations where the borings will penetrate through the Concrete Cap, bentonite hole plug or Portland-bentonite grout will be placed from the bottom of the borehole to within one foot of the concrete pavement surface. The upper foot of the borehole will then be filled with Portland cement to repair the Concrete Cap. In the event the Concrete Cap is disturbed during the SUE activities, potholes will be backfilled, and the concrete surface will be repaired following the same method as the boreholes.

Investigation-derived wastes (IDW) including soil cuttings and decontamination water generated from these activities will be containerized on Site pending waste classification. IDW will be classified and profiled for disposal at a UPRR-approved TCEQ permitted landfill facility based on the comparison of the IDW analytical data to the TCEQ *Guidance for the Classification and Coding of Industrial and Hazardous Wastes (RG-022, Revised 03/22)*. Pending waste classification, Texas Waste Codes (TWCs) listed on the current Notice of Registration (NOR) (Solid Waste Registration Number 31547) will be used for the wastes generated from the sampling activities.

If you have any questions or need additional information, please feel free to call me at (512) 671-3434 or Mr. Kevin Peterburs of UPRR at (414) 267-4164.

Sincerely,

WSP USA Inc.



Anthony Reid, P.G.
Senior Consultant, Hydrogeologist



Eric C. Matzner, P.G.
Vice-President, Director Hydrogeologist

CC: Waste Program Manager, TCEQ Region 12, Houston

