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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 17, 2023

Mr. Kevin Peterburs

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

RE: NOTIFICATION OF SOIL SAMPLING ACTIVITIES AT THE UNION PACIFIC RAILROAD HOUSTON WOOD PRESERVING WORKS FACILITY, 4910 LIBERTY ROAD FACILITY, HOUSTON (HARRIS COUNTY) POST-CLOSURE CARE PERMIT NO. HW-50343; INDUSTRIAL SWR NO. 31547; CN600131098; RN100674613; EPA ID No. TXD000820266

Dear Mr. Peterburs;

Thank you for the opportunity to review the soil sampling plan for the proposed Englewood Yard Expansion -Phase 3 project. The TCEQ has the following comments:

1. Revise Figure 1 to show the proposed soil sample locations in relation to the NAPL seep areas that occurred between 2022 -2023 in the Railroad Ballast and Concrete Ballast capped areas.
2. If NAPL seeps are encountered during sampling and construction activities, clarify how seep areas will be sampled and addressed during construction activities.
3. The sampling purpose is unclear. Is UPRR trying to identify what COCs are needed to classify soils for disposal?
4. UPRR explains that soil samples will be collected and composited from the proposed soil borings across the 5-foot total depth. Is the 5-foot representative of the depth likely to be disturbed?
5. Compositing samples prior to (volatile organic compounds (VOC) analysis is problematic, and not acceptable. Discrete soil samples need to be collected for VOC analysis consistent with soil sampling activities associated with EPA's ASAOC.
6. The proposed soil sampling analysis includes 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. Clarify if soils will be analyzed for Dioxin/Furans per EPA Method 8290A or 1613B to be consistent with soil sampling analysis associated with EPA's ASAOC.
7. Is UPRR submitting an air monitoring plan? Clarify if the sampling entails minimal disturbance that would not require air monitoring.
8. Clarify why UPRR chose plugging holes that are punched through the synthetic liner and cap material and repairing potholes by simply using a quick patch with grout. Also, do larger holes need more deliberate pavement repair for long-term stability?

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9. For waste classification, UPRR should reference 30 TAC 335 Subchapter R in addition to the guidance cited.

Please submit a revised sampling in fifteen (15) days of the date of this letter. 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. The information in the reference block should be included in all submittals. 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 Correspondence ID Form helps ensure that your documents are identified correctly and are routed to the applicable program for a timely response.

Sincerely,



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

MMH/mmh

cc: Karina Rocha, TCEQ Waste Section Manager, Houston Office, MC-R12 (email)