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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 23, 2020

Transmitted via email

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

Re: Approval with Comments
Pentachlorophenol Soil Assessment Interim Report, dated March 30, 2020
Union Pacific Railroad (UPRR) Houston Wood Preserving Works Facility
4910 Liberty Rd., Houston (Harris County)
TCEQ SWR No. 31547; TCEQ Permit No. 50343
Customer No. CN600131098; Regulated Entity No. RN100674613
EPA ID No. TXD000820266

Dear Mr. Peterburs:

The Texas Commission on Environmental Quality (TCEQ) has completed review of the above-referenced Pentachlorophenol (PCP) Soil Assessment Interim Report (Report), dated March 30, 2020. Based on our review of the report, the TCEQ approves the Report with the following comments and recommendations.

1. The Report documents the results of 15 soil samples collected on-site at the UPRR northwestern and western property boundary. In summary, the assessment results indicate:
 - a. PCP concentrations in all 15 soil samples locations are below the commercial/industrial (C/I) $\text{TotSoil}_{\text{Comb}}$ protective concentration level (PCL) for a 30-acre source area of 32 milligrams per kilogram (mg/kg).
 - b. PCP concentrations in three (3) of the 15 soil sample locations exceeded the Tier 1 Residential $\text{TotSoil}_{\text{Comb}}$ PCL for a 30-acre source of 0.73 mg/kg which included sample locations SSO-03 on the northern property boundary, and SSO-07 and SSO-08 on the western property boundary.
 - c. PCP concentrations reported in nine (9) of the 15 soil sample locations exceeded the Tier 2 $\text{GWSoil}_{\text{Ing}}$ PCL of 0.12 mg/kg. To further assess the soil-to-groundwater pathway, UPRR evaluated groundwater sampling results for PCP concentrations from monitoring wells in the uppermost groundwater bearing zone across the site. The TCEQ concurs that the results generally support the conclusion that the concentrations of PCP in soil are protective of groundwater. However, the groundwater investigation has not addressed all locations identified with PCP Tier 2 $\text{GWSoil}_{\text{Ing}}$ PCL exceedances. Please identify how these locations will be addressed in the proposed sampling plan.

2. Based on review of the PCP soil assessment results, additional soil sampling is necessary to delineate PCP concentrations off-site to ^{Total}Soil _{comb} residential PCLs. Additional soil and/or groundwater sampling may be necessary to address the PCP Tier 2 ^{GW}Soil_{ing} PCL exceedances discussed above. Please include step-out soil sampling locations to ensure that the extent of the impacted soil is delineated. Soil samples should be collected using a similar approach as described in the Report and should be analyzed for PCP.
3. The report contains original geoscience interpretation, and as a result, those pages should be sealed by a Professional Geoscientist (P.G.) licensed in the State of Texas. Please submit a sealed copy of each figure, soil boring log, or other item, where geoscientific interpretations have been made.

Within 15 days of the date of this letter, please submit a schedule to complete the above recommended additional PCP soil assessment activities (including a figure depicting proposed soil sample locations), provide any required TRPP notifications and submit a revised PCP Soil Assessment Report.

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 Correspondence ID Form helps ensure that your documents are identified correctly and are routed to the applicable program for a timely response. 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

MH/mdh

cc: Ms. Alma Jefferson, TCEQ, Waste Section Manager, Houston Regional Office, via email
Mr. Eric Matzner, Golder Associates Inc., via email

Mr. Kevin Peterburs

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TCEQ Program ID No. 31547