

Part 3: Reduction Achievement for the Report Year

Waste minimization typically applies to operating facilities. The only wastes generated at this Union Pacific Railroad Houston Wood Preserving Works Facility are environmental media as a result of the specific investigation, remediation, or post-closure care activities (investigative-derived wastes (IDW)) directed by the Texas Commission on Environmental Quality (TCEQ) under the Permit and Compliance Plan. These IDW are related to the scope of the RCRA Facility Investigation (RFI) activities, as approved and required by the TCEQ under the Permit and Compliance Plan.

However, UPRR has implemented procedures at the Facility to reduce the amount of IDW generated during these activities. Investigative techniques such as low-flow ground water sampling and direct-push or sonic drilling technologies are utilized when possible during installation and sampling of soil borings, monitor wells and piezometers in order to reduce the volume of soil cuttings and purge water generated for off-site disposal. Since the waste is generated on an intermittent basis depending on required actions dictated by the RFI activities and the TCEQ, specific measureable reduction goals are difficult to quantify and year-to-year reductions are not applicable given the uncertainty in IDW generated one year compared to another.

Currently, hazardous wastes generated on a regular basis are "Aqueous waste with low solvents" (TCEQ Waste Code 0914101H) associated with groundwater monitoring activities at the RCRA Unit No. 1 (SWMU No. 1) and site-wide groundwater monitoring activities, and "Recovered creosote non-aqueous phase liquids from groundwater monitoring/recovery wells, may be mixed/emulsion with groundwater, generated as part of corrective action work performed at the site" (TCEQ Waste Code 0918219H) where creosote NAPL is pumped from groundwater wells.