GOLDER
MEMBER OF WSP

December 8, 2021

Ms. Maureen Hatfield, P.G.
Texas Commission on Environmental Quality
MC-127
VCP-CA Section, Team 1, Remediation Division
P.O. Box 13087
Austin, Texas 78711-3087

RE: WEEKLY STATUS UPDATE – ENGLEWOOD YARD NORTH BYPASS PROJECT
UNION PACIFIC RAILROAD HOUSTON WOOD PRESERVING WORKS SITE
4910 LIBERTY ROAD FACILITY, HOUSTON, TEXAS
POST-CLOSURE CARE PERMIT NO. 50343, INDUSTRIAL SWR NO. 31547

Dear Ms. Hatfield:

Golder Associates USA Inc. (Golder), a member of WSP, on behalf of Union Pacific Railroad (UPRR), prepared this weekly status update for the Englewood Yard North By-Pass Project (the Project) that includes areas of construction within the UPRR Houston Wood Preserving Works (HWPW) site (the Site) (Post-Closure Care Permit No. 50343) located at 4910 Liberty Road, Houston, Texas. Below is a summary of the Project activities conducted at the Site for the reporting period:

Week Period: *November 29 through December 5, 2021*

- **Dust Control and Air Monitoring (summary taken from IHST Weekly Report of Air Monitoring (Attachment A))**
  - IHST conducted real time air and dust monitoring at the Site in accordance with the Air Monitoring Plan (July 8, 2021), and the results for this period are provided in Attachment A.
  - As noted in the IHST Weekly Report (Attachment A), dense fog was observed on the mornings of November 1, and December 1 and 2, resulting in elevated particulate instrument readings in the morning hours. The readings typically dropped to below Notice Levels as fog burned off later in the morning, typically between 09:00 and 10:00. No site activities were observed during any of these periods which would contribute to the higher readings during these times. The elevated readings appear entirely attributable to ambient weather conditions with the morning fog and condensation.
  - On December 1, 2021, station AMS-05a, located at the southwest corner of the intermodal yard near Lee and Waco, experienced network communication problems. No particulate monitoring data was collected for this location on this day. Unit AMS-05a was replaced with another air monitoring station on subsequent days.

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- There were two events where PM 2.5 and PM 10 readings increased above the Notice Levels during the monitoring period. As indicated in the IHST Weekly Report (Attachment A) and detailed below, both events were a result of outside incidents and not related to the construction activities:
  - On December 1, 2021, dense early morning fog was present, creating elevated readings at all stations. Around 08:15 – 08:20, an additional rise in PM 2.5 and PM 10 particulate readings began, impacting all stations. An odor of smoke was noted, and a visible haze was present across the entire work site. Site activities were checked, and no site activities were being performed that generated significant visible dust. Visual observation of the haze showed it appeared heaviest north of Liberty Road, near the Lockwood overpass. Further investigation found the source of the haze and odor was a neighborhood trash fire burning one block northeast of Liberty Road and the Lockwood overpass (trash fire visually confirmed by hygienist conducting the air monitoring). Particulate levels peaked between 08:23 - 09:26, with stations along the northeast perimeter of the former Houston Wood Preserving Works site (AMS-06, AMS-07 and AMS-08), Liberty Road at the Lockwood overpass (AMS-12) and the Englewood Yard Office (AMS-01) reaching Take-Action levels. Particulate levels briefly reached Stop-Work levels at AMS-01 (Englewood Yard Office, 08:39 – 08:49). No additional dust control measures were implemented, and work was not stopped, as observations clearly indicated that site construction activities were not the source of the elevated particulate readings (consistent with protocols outlined in the TCEQ-approved dust control plan for the site). Smoke haze and elevated particulate readings at stations had dissipated and particulate concentrations at all stations dropped below Notice Levels by approximately 10:00.
  - On December 2, 2021, elevated particulate readings at all stations were observed at station startup. After sunrise and some dissipation of morning fog, a visible haze was observed throughout the Site and surrounding area. Review of regulatory air monitoring data from TCEQ air monitoring station Houston North Wayside C405/C1033, located approximately 3.4 miles to the northeast of the Site and not associated with the Project, indicated elevated particulate patterns similar to those observed in the Site area, confirming the wide-spread nature of the atmospheric event. IHST was not able to identify the source(s) of the haze but it appeared to have been likely associated with residual smoke from a large trash fire at a recycling plant that occurred around 19:00 on the previous night (December 1) near the 6900 Block of North Eldridge in Houston, about 20 miles northwest of the site. By 09:53, particulate levels at all stations were reporting levels below the Notice Levels for PM 2.5 and PM 10 particulates. Site activities were not generating significant visible dust and were not the source of the elevated particulate concentrations during this period.
- On December 2, 2021, deployment of station AMS-11, on the southwest side of the former Houston Wood Preserving Works site, near Quitman Street, was delayed. An occupied homeless camp was found established in the station location overnight, and station deployment was delayed until the homeless camp was cleared by local law enforcement. AMS-11 was not deployed until approximately 09:35.
- Air samples for analytical testing were collected on November 30 and December 1, 2021, and submitted to the Pace National Laboratory in Mt. Juliet, TN (Pace) on December 2, 2021 for analysis.

- Analytical results for samples collected on November 30 and December 1, 2021 will be validated and posted to the weekly update. It is anticipated that the validated data will be available the week of **December 13, 2021.**
- Results of Integrated Air Samples for PAHs collected on November 22, 2021 indicated that there were no exceedances of TCEQ Air Monitoring Comparison Values (AMCV) (see Attachment A for the analytical results).
- Analytical results of Integrated Air Samples for Metals (lead and arsenic) collected on November 16, 17, 22, and 23, 2021 have not yet been received from the laboratory at the time of this report. It is anticipated that the validated data for these samples will be available the week of **December 13, 2021.**

- **Soil Management**
  - Activities that resulted in the generation of excavated soils for this weekly period included installing three power poles within the Railroad Ballast Cap area using air knife technology.
  - Approximately 8 cubic yards (CY) of soil classified as impacted with listed hazardous waste (F034/K001) was generated and stored in roll-off containers staged at the HWPW Container Storage Area (CSA) pending disposal. Roll-off containers will be shipped to the US Ecology Texas Treatment, Storage, and Disposal Facility (TSDF) in Robstown, TX.
  - Wash water that was generated during equipment decontamination activities and initially placed in plastic lined, liquid tight roll-off containers with the generated soils was pumped from the roll-off containers into a roll-off vacuum box staged at the HWPW CSA. The wash water will be sampled for waste characterization analyses.
  - Pending waste characterization results, wash water will be disposed at an approved and authorized disposal facility.
  - Two roll-off containers containing approximately 15 CY (each) of soil classified as impacted with listed hazardous waste (F034/K001) were shipped to the US Ecology Texas TSDF in Robstown, TX on December 1, 2021 (Hazardous Waste Manifest Number: 022648994JJK) and December 2, 2021 (Hazardous Waste Manifest Number: 022649000JJK).
- **Stormwater Management**
  - There was no rainfall during this weekly period that resulted in management of stormwater within the Project area.

Planned Construction Activities for the week between **December 6 and December 12, 2021**:

- **Dust Control and Air Monitoring**
  - Continue to conduct air monitoring per the approved Plan.
  - Review and validate the analytical results for air samples collected on November 16, 17, 22, 23, and December 2, 2021.
- **Soil Management**
  - Manage soils generated using a mini excavator from the installation of a utility trench within the Railroad Ballast Cap area.
- **Stormwater Management**
  - Manage stormwater in the event of rainfall in the area per the approved Storm Water Pollution Prevention Plan (SWPPP).