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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

April 23, 2020

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

Re: Approval with Comments  
*Soil Vapor Intrusion Assessment Interim Report*, dated March 31, 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 Soil Vapor Intrusion (VI) Assessment Interim Report (Report), dated March 31, 2020. Based on our review of the above referenced report, the TCEQ approves the Report with the following comments and recommendations.

1. Although not stated in the report, TCEQ understands that bulk soil samples for volatile organic chemical analyses were collected according to Method 5035A.
2. Alternate soil gas probe sampling locations should be established to account for the probes that were not sampled due to the presence of water in probes SG-1 through SG-7, SG-9, and SG-13. Probe sample locations should be in the general vicinity of the existing probes, and at a distance away from any utilities that may be present. UPRR should gain access to private properties to install the probes. Probe construction should follow the January 31, 2020 approved VI Assessment Work Plan or using a geoprobe implant. Samples should be collected and analyzed for chemicals of concern (COC) in accordance with the TCEQ approved protocol outlined in the VI Assessment Work Plan dated January 31, 2020. Bulk soil samples at each probe location should be collected to evaluate the vertical separation distance.
3. TCEQ understands that the vapor probes that were installed are permanent. The vapor probes should remain in place while the vapor intrusion investigation is ongoing.

Within 7 days of the date of this letter, submit a schedule to complete the above recommended additional VI assessment activities, with a figure depicting proposed soil gas probe locations, and the submittal of a revised VI 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 and to me at [Maureen.Hatfield@tceq.texas.gov](mailto:Maureen.Hatfield@tceq.texas.gov). Note that the electronic and hard copies should be identical,

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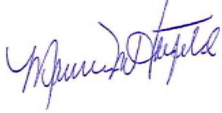
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complete copies. A Correspondence ID Form (TCEQ Form 20428) must accompany each document submitted to the Remediation Division and should be affixed to the front of your submittal. The Correspondence ID Form helps ensure that your documents are identified 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,

A handwritten signature in blue ink, appearing to read "Maureen Hatfield".

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, MC-R12,  
via email

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