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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 23, 2019

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

Re: Comments

Letter, UPRR's Response to TCEQ Additional Comment Letter dated September 6, 2019,
Proposed Vapor Intrusion Assessment Work Plan, dated December 20, 2019
Union Pacific Railroad - Houston Wood Preserving Works Facility, 4910 Liberty Rd.,
Houston (Harris County)
TCEQ Hazardous Waste Permit No. 50343; EPA ID No. TXD000820266
TCEQ SWR No. 31547, CN600131098, RN100674613;

Dear Mr. Peterburs:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced UPRR December 20, 2019 letter which included a revised Vapor Intrusion (VI) Assessment Work Plan. UPRR prepared the revised VI Assessment Work Plan in response to the pre-design assessment modifications outlined in TCEQ's September 6, 2019 comment letter and later discussed with the TCEQ during a December 19, 2019 meeting. Based on review of UPRR's December 20, 2019 letter, please submit a revised VI Assessment Work Plan which incorporates the TCEQ comments listed below by January 3, 2020 before any VI assessment activities begin:

1. Page 1, 2nd paragraph, Vapor Intrusion Investigation Procedures: Since all 22 soil gas probes will not be installed along Liberty Road, please clarify that nineteen of the 22 soil gas probes will be installed along Liberty Road. The other three gas probes will be installed near monitor wells MW-35A, MW-32AR, and MW-33A.
2. Page 2, 1st paragraph, Soil Sample Location and Analysis: Please clarify that soil samples will be collected from borings and analyzed for chemicals of concern (COCs) prior to installing soil gas probes.
3. Page 2, 2nd paragraph, Soil Sample Location and Analysis: To be consistent with EPA's petroleum vapor intrusion guidance, revise the second paragraph to use the word "clean" instead of "unimpacted." Because the soil can be affected to some extent and still meet the definition of "clean."
4. Page 2, 2nd paragraph, 2nd Bullet, Soil Sample Location and Analysis: Revise the sample depth from 5 to 6 feet below ground surface (bgs) to 5.5 to 6 feet bgs.
5. Page 2, 3rd paragraph, Soil Sample Location and Analysis: The first sentence states, "Based on PID readings in the soil boring, the sample depths may be modified." Please remove the above sentence from the third paragraph to and replace it with, "Samples will be collected from 5.5 to 6 feet bgs." Regardless of the PID reading, a sample must be collected from 5.5 to 6 feet bgs.

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6. Page 2, 3rd paragraph, Soil Sample Location and Analysis: Please state that the auger liner is being used to collect an undisturbed soil sample.
7. Page 2, 3rd paragraph, 1st Bullet, Soil Sample Location and Analysis: For clarification please add an "A" to EPA Method 5035 so it reads "EPA Method 5035A."
8. Page 3, 1st paragraph, Soil Gas Probe Sampling and Analysis: Please add that samples will not be collected until 48 hours after a rain event.
9. Table 1 - TRRP Residential Risk Based Exposure Limits (RBELs) and Target Soil Gas Assessment Levels: For clarification, under "Notes" add the following sentence, "The target soil gas concentration is determined by dividing the RBEL by the attenuation factor."

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.

Sincerely,



Maureen Hatfield, P.G., Project Manager
Team 1, VCP-CA Section, Remediation Division
Texas Commission on Environmental Quality

MH/mdh