



San Jacinto River Waste Pits Superfund Site

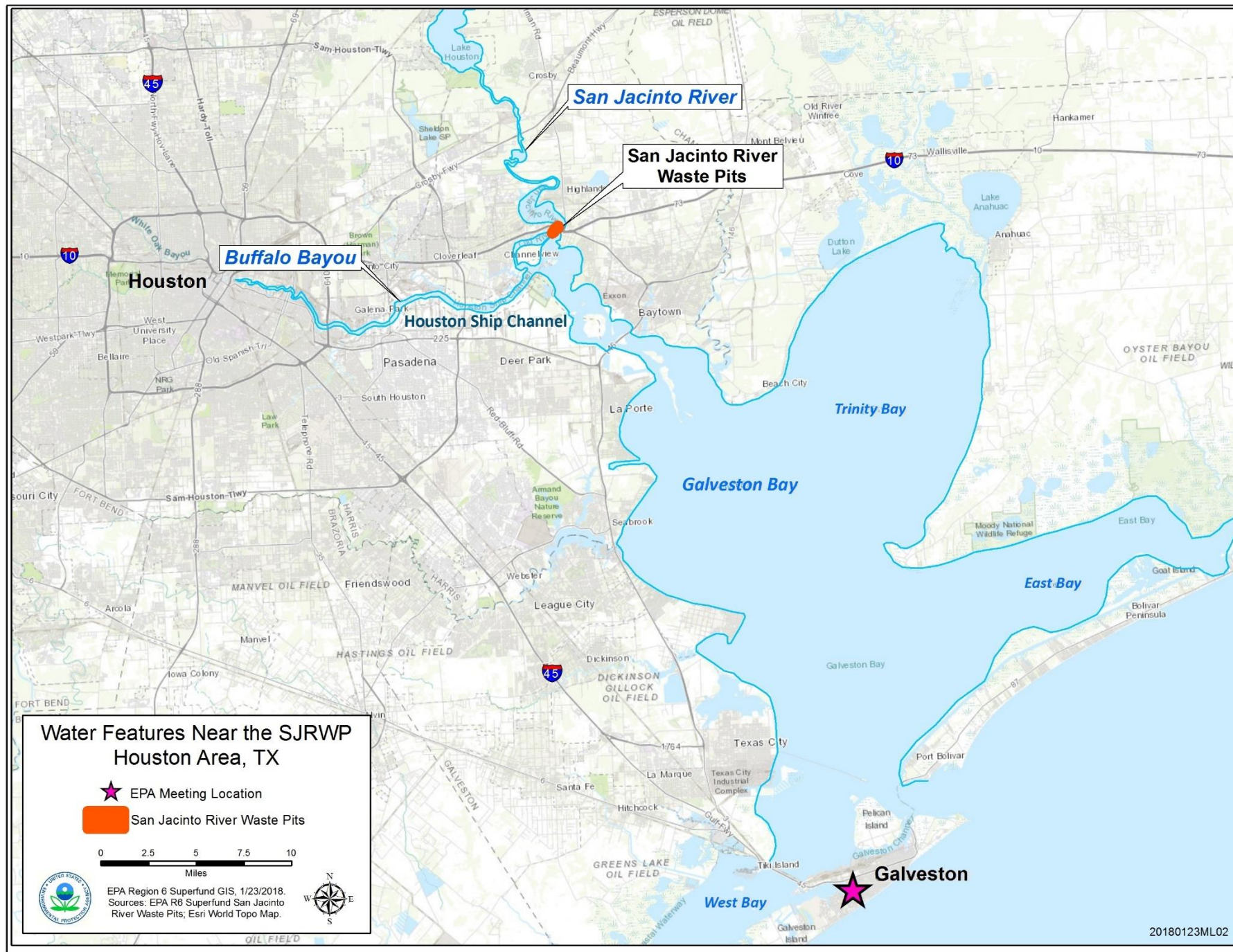
**Community Update Meeting
December 5, 2022**

Discussion Topics

- Site Overview
- Southern Impoundment Remedial Action Update
- Northern Impoundment Remedial Design Update
- Community Update



Site Overview





San Jacinto River Waste Pits
Harris County, TX

0 0.1 0.2
Miles
0 250 500 750 1,000
Feet
Esri World Imagery

Sand Separation Area

Northern Impoundments

Southern Impoundment

EPA Region 6
Superfund GIS
6/9/2021
20210609ML01

Background

- Built in the mid-1960s for disposal of paper mill wastes
- Northern & southern impoundments cover about 15 acres each
- Contaminated with dioxins and furans
- San Jacinto River Waste Pits added to the National Priorities List (Superfund) in 2008

Changing River Conditions

1966

1997

2006



Why Actions Taken to Cap Pits

- Dioxin exposed at surface and in the river
- People were being exposed
- Uncontrolled releases to river
- Time to complete site investigations
- Temporary cap was necessary to prevent releases & exposures



Cap Construction: 2010 to 2011

Summary of Selected Remedy

- Remove waste from the northern and southern impoundment for offsite disposal.
- Prevent releases to the river during excavation BMP (wall).



Southern Impoundment

Remedial Action Update

San Jacinto River Waste Pits Superfund Site Southern Impoundment



Regulatory Milestones

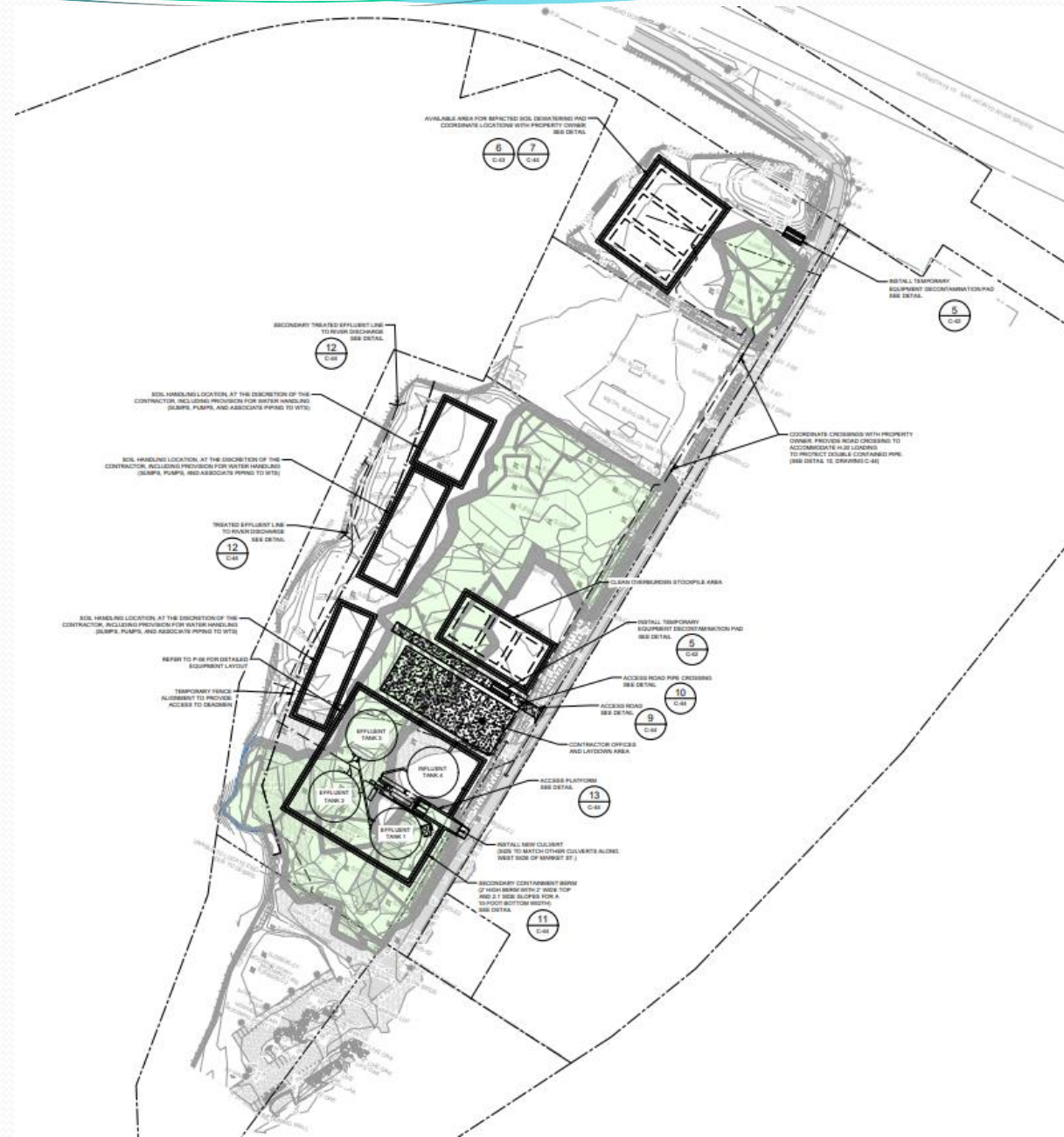
- Record of Decision (ROD) - October 2017
- Remedial Design (RD) Administrative Settlement Agreement and Order – effective April 2018
- Southern Impoundment 100% RD (Amended April 2021) - approved May 2021
- Remedial Action (RA) Unilateral Administrative Order – effective September 2021
- RA Work Plan (RAWP) – approved November 2021
- Pre-Construction Field Sampling Event (PCFSE) – November 2021 through February 2022
- Addendum to the 100% RD – approved August 2022

Administrative Updates

- Pre-Construction Conference - October 25, 2022
- Updated Supporting Deliverables - received October 25, 2022

Field Status

- RA Construction Start November 9, 2022
- Oversight provided by EPA RPMs and EPA contractor
- Field activities and objectives:
 - Site prep (vegetation, fencing, etc.)
 - Water treatment system
 - Administrative trailer & set up
 - Excavation start



Estimated RA Timeline

- RA Construction Start
November 9, 2022
- 2 working seasons
(excavation November
through May)



Season 1

Season 2



Field Updates

Since November 9, 2022:

- Personnel arrival
- Safety walk through
- Equipment delivery



Field Updates

Since November 9, 2022:

- Equipment delivery



Field Updates

Since November 9, 2022:

- Mowing



Field Updates

Since November 9, 2022:

- Utility survey
- Concrete pad demo



Field Updates

Since November 9, 2022:

- Utility survey
- Concrete pad demo



Field Updates

Since November 9, 2022:

- Fencing & erosion control



Field Updates

Since November 9, 2022:

- Water treatment prep



Field Updates

Planned for Dec 22/Jan 23:

- Additional sampling
- Water treatment system startup
- Truck staging & inspection areas
- Excavation & off-site disposal
- Water treatment & discharge



Material Management

Site prep

Sampling

Excavate

De-water/solidification
as needed

Load/decon
truck

Off-site disposal

Community Updates

- June Community Meeting Follow-up
 - Meeting with Emergency Responders
 - Channelview FD, Harris County Emergency Response, HAZMAT response
 - Responders reviewed HASP, ERP, and TODP
 - PRP will provide summary information to be distributed and updated in their system so responders are aware of Site status.
- Response to inquiries
 - Buoy lights
 - Cars near entrance on weekends
- Community Awareness Committee Meetings Continue
- Updates to Website: <https://www.epa.gov/tx/sjrwp>
 - How to Access “Publicly Available Documents” on EPA Website



Northern Impoundment

Remedial Design Update

Remedial Design Activities

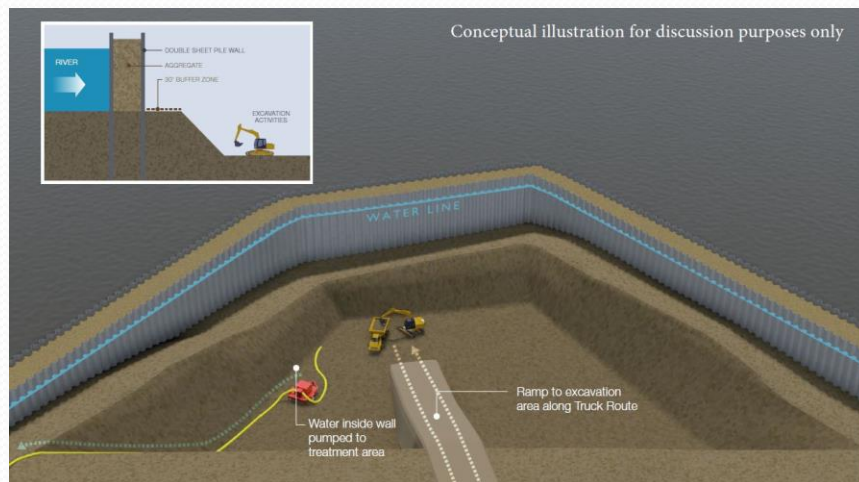
- RD Administrative Settlement Agreement and Order – April 2018
- Pre-Design Investigation 1 – Dec 2018
- Pre-Design Investigation 2 – October 2019
- 30% Remedial Design – May 2020
- Supplemental Design Investigation –September 2021
- ***NEW*** Partial 90% Remedial Design – June 26, 2022
- ***NEW*** 90% Remedial Design for Northwest Corner – November 8, 2022
 - These documents are currently under EPA and Stakeholder Review

REVIEW: PRP Letter – Request to Alter Remedy

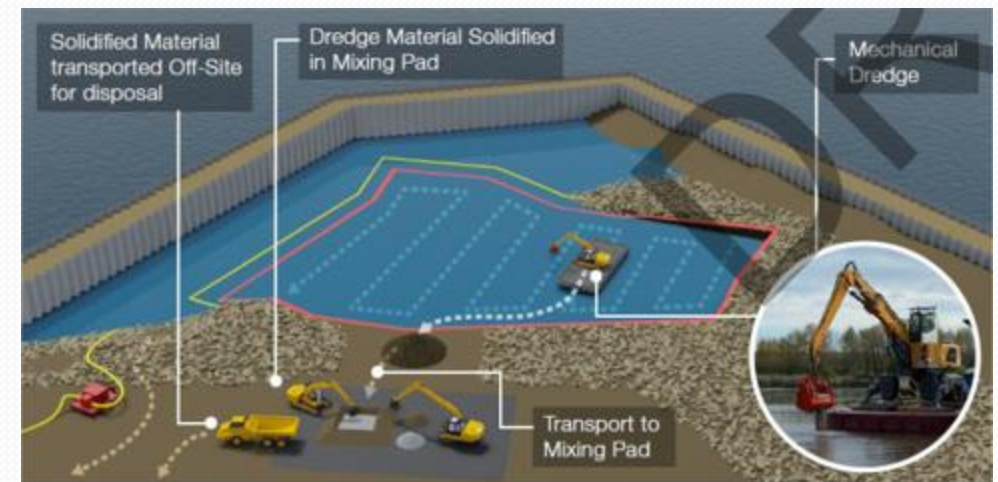
- March 24, 2022 PRP letter requested EPA to alter response action at the Site and delay the submittal of the 90% RD.
- Reasons cited include increased waste volumes, engineering complexities, TxDOT's I-10 bridge project, among other things.
- April 15, 2022 EPA Regional Administrator response:
 - Need 90% RD to help evaluate the PRP claims.

REVIEW: Excavation Approaches

- Approach A - removal of all water in the cell, and dry excavation of the waste material inside the BMP (wall) (Most of site)
- Approach B - removal of the waste material through a column of water inside the BMP (wall).
 - May be considered where hydraulic heave is an issue. Memo to File Aug 2022.
- EPA has been consistent that a capping remedy is not compliant with the 2017 ROD and cannot be considered.



OR



Summary of Claims of Technical Challenges and Uncertainties in 90% Remedial Design

- Excavation
 - Claim various technical issues and design elements limit excavation depth
 - Claim impact to community is greater if remove all waste
 - Community letter stated would rather waste be removed
 - Claim the area based average concentration site wide approach used for the design is critical to implementation of the remedy
- Northwest Corner
 - Claim additional heave concerns (Re-reviewing across site, including June deliverable)
 - Claim issues with completing dredging in NW corner in one season.
 - Claim a larger footprint needed for dredging option
 - Claim concern with residuals management

Wall Alignment – 90% RD Submittal

- *NEW* Southern portion of wall moved further south, covering more of TxDOT's ROW.
- Excavation months remain November to April
- Planning to subdivide into seasonal cells.



Summary of Claims of Technical Challenges and Uncertainties in 90% Remedial Design (Cont.)

- Wall
 - Claim the new wall alignment increases likelihood of barge strikes that could cause BMP failure
 - EPA is reviewing how they plan to mitigate the risk of BMP failure from barge strike
 - Claim there is no guarantee river levels will not exceed historical levels and, therefore, there is an inherent risk of release to river
 - PRP chose wall height after analysis
 - Claim issues with availability of materials for wall construction (availability, schedule, and feasibility of acquiring materials)
- Water Treatment
 - Claim significant uncertainties with respect to water treatment. Claimed there is a concern regarding how treatability testing will translate to field scale implementation.

TxDOT I-10 Bridge Replacement

90% RD claims possible implementability issues regarding this project such as:

- Concern regarding access to site
- PRPs claim current double wall design is the only implementable option.
 - TxDOT has asked for smaller footprint
- TxDOT commented on 90% RD
 - EPA shared TxDOT comments early to be reviewed due to timing of TxDOT design
 - TxDOT requests more analysis on impact to their project, bridge, and protective structures
 - TxDOT expressed concern regarding end state of site, truck traffic, access, etc.
- TxDOT/PRP/EPA call November to discuss TxDOT comments
- TxDOT has been cooperative and responsive and open to working collaborative on these issues

90% RD Review – Next Steps

- June and November Submittals are being considered together as the 90% Remedial Design deliverable (Still under preliminary review).
- PRP claims impacting implementability need to be thoroughly evaluated.
- EPA is looking at mechanisms to get additional technical resources to review these implementability claims.
- EPA will keep CAC informed regarding this review.

QUESTIONS?

Additional information available at

<https://www.epa.gov/tx/sjrwp>

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