jweaver@portlavaca.org Agenda 8C

From: John Hogue <john@crgtexas.com>
Sent: Friday, May 21, 2021 3:27 PM
To: jweaver@portlavaca.org
Subject: Phase II Report - TRRP Screening
Attachments: Report - Phase II ESA - TRRP Screening.pdf; Invoice 21-0877 Phase II - City of Port Lavaca LF.PDF

Jody,

Attached is the Phase II report (and our invoice for the effort) for your review. As you will see in the report, we ended up with an exceedance of a TRRP protective concentration level (PCL) – arsenic in one groundwater sample. I suspect this is related to the proximity to the coast as discussed in the report but don't have a ton of information to offer an alternative explanation for the detection. I don't see arsenic in the soil samples at concentrations of concern. Could be related to old landfill activities or arsenic in the area runs a little higher. The water quality in that temp well sample indicates a coastal influence for sure (high TDS and chlorides).

Your options…

1) If you want a determination from the agency, we send the report in and let the chips fall as they may. Might get lucky and they agree with the TRRP exclusion and no further action would be required;

2) Install a single permanent monitoring well and sample for arsenic. See if we get a different result. The sample was from a temp well so it's possible it's a suspended solids issue (even though we did analyze a lab filtered sample, so likely it's a dissolved issue). The other GW sample fell way below the arsenic PCL. So the issue appears to be localized. If it comes back clean or below PCL, this would solidify the exclusion from TRRP.

Of course, it could come back "hot" in which case, it would result in opening a TRRP case where wells would be needed. As part of any permanent well installation, we conduct a pump / slug test to classify the GW. If the GW is determined to be Class 3 (low yield or poor quality), the arsenic issue goes away as the PCL is 100x higher for Class 3 GW. Use of the Class 3 PCL doesn't happen until TRRP kicks in, unfortunately.

A GW determination is also required to complete the Affected Property Assessment (APA) under TRRP. An APA is a prescriptive assessment that would look at a number of things (exposure pathways and receptors) to pursue no further action or a risk based closure (RBC) . I doubt a RBC would result in active remediation but you'd likely have to monitor groundwater for a time (at least a year) and place a deed restriction on the site to prohibit groundwater use. Sadly, it is a process so there's no easy way to jump to an obvious endpoint without entering the site into TRRP under the TCEQ Voluntary Cleanup Program (VCP). Further, It is a landfill site. They might want more assessment which may identify other issues.

It did look as if some surface cleanup work had been done; however, there are still a number of containers (seems like oils, petroleum products, etc) that need to be addressed. If they leak (beyond the de minimis releases to date) then you'd be looking at a surface / spill rules / TRRP cleanup. And heaven forbid that material hits the water… might get a visit from the US Coast Guard. Nothing is real close to the water yet…just pointing out the down side.

Happy to discuss at your convenience.

JHogue