



February 16, 2023

Project No. 2040906205

**Mack Borchardt**

City of Frisco  
6101 Frisco Square Boulevard  
Frisco, Texas 75034

**RE: STATUS OF CAMU ACTIVITIES – ANNUAL REPORT, FRISCO COMMUNITY DEVELOPMENT CORPORATION SITE, 7471 OLD 5<sup>TH</sup> STREET, FRISCO, TEXAS, AGREED ORDER, DOCKET NO. 2013-2207-IHW-E**

Dear Mr. Borchardt,

WSP has prepared this Status of Corrective Action Management Activities – Annual Report (CAMU Annual Report) to fulfill requirements for the Agreed Order Docket No. 2013-2207-IHW-E issued to Exide Technologies by the Texas Commission on Environmental Quality (TCEQ) for the above referenced facility (Site). The Site, previously owned and operated by Exide Technologies, was purchased by the City of Frisco Community Development Corporation (Frisco CDC) on October 26, 2020 and is hereafter referred to as the Site.

In 2022, the following activities were completed for the CAMU:

- Quarterly groundwater sampling was continued throughout 2022 in accordance with the Revised Class 2 Landfill Groundwater Monitoring Plan. The Second Semiannual Groundwater Monitoring Report for 2021 was submitted on January 19, 2022. The First Semiannual Groundwater Monitoring Report for 2022 was submitted on July 20, 2022.
- Monitoring well MW-44 was plugged and abandoned on May 26, 2022 after debris carried by flood waters from a preceding rain event damaged the concrete surface seal and pulled the well's casing and screen up from the depth it was initially installed. In email correspondence on May 23, 2022, TCEQ concurred that MW-44 should be plugged and abandoned, and a replacement well installed during implementation of the Response Action Plan.
- On June 2, 2022, a revised *Conditional Letter of Map Revision for Stewart Creek* (CLOMR) was submitted to the Federal Emergency Management Agency (FEMA) for the proposed retaining wall, culvert, and channel improvements along Stewart Creek. FEMA provided comment to that submittal on August 23, 2022. On November 16, 2022, a revised CLOMR and response to comments letter was submitted to FEMA after input and comments by the Agency.
- In response to a routine audit by the TCEQ's Waste Permits Division, on June 9, 2022, WSP responded to requests for information on two Class II non-hazardous waste streams from the Site. The response to the TCEQ's request included process information and safety data sheets for waste codes 00562192 and

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00253902. Waste code 00562192 includes waste for used polymers, flocculant, and antifoam agents used in the operation of the on-site wastewater treatment plant, and waste code 00253902 is for concrete debris picked up during demolition and closure of the former Exide Frisco Recycling Center.


- On August 22, 2022, a “Permit Renewal Application and Plain Language Summary” was submitted to TCEQ to supplement their review of the RCRA renewal application submitted in 2019.
- The City of Frisco plans to install a new water line and replace a sewer line on the Site that requires certain soil management practices. On December 8, 2022, a *Utility Replacement Soil Excavation Interim Action Work Plan* (Work Plan) was submitted to the TCEQ for review. The Work Plan described proposed soil excavation activities related to utility replacement and the soil disposal and monitoring activities to take place during construction activities.

## CLOSURE

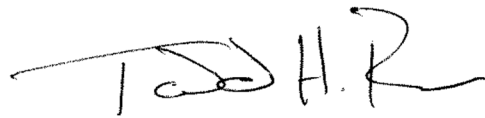
WSP appreciates the opportunity to assist the Frisco Community Development Corporation with this project. Please contact us if you have any questions or comments concerning this annual operational report.

Sincerely,

**WSP USA INC.**



Gerardo Ruiz de la Peña, P.G.  
*Senior Lead Consultant*



Todd H. Rees, Ph.D., P.E.  
*Senior Director*

CC: Toby Baker – TCEQ Executive Director  
Wes Pierson – Frisco City Manager, City of Frisco  
Bill Shafford – TCEQ Austin  
Jason Gray – J.D Gray Group (City of Frisco)  
Chris Shaw – TCEQ Austin  
R. Stuart Goldsmith – TCEQ Austin  
Erin Gorman – TCEQ Region 4  
Brad Weaver – JEM Connections LLC (City of Frisco)