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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 4, 2013

Mr. George Purefoy, City Manager
City of Frisco
6101 Frisco Square Blvd., 5th Floor
Frisco, Texas 75034

Re: Affected Property Assessment Workplan (Workplan) dated October 2013, Grand Park Property, 7275 Dallas Parkway, Collin County, Frisco, Texas; Voluntary Cleanup Program (VCP) No. 2592; Customer No. CN600245526; Regulated Entity No. RN106847114

Dear Mr. Purefoy:

The TCEQ has reviewed the above referenced submittal. Please see the following comments to facilitate revisions to the Workplan:


- 1) **Site History:** A Phase I Environmental Site Assessment (ESA) which includes a discussion of the nature and extent of the agricultural and/or other uses of the property should be submitted to the TCEQ. Recognized environmental conditions that are identified in the Phase I ESA should be incorporated in the affected property assessment.
- 2) **Additional Off-Site Assessment Area:** As described in Section 2.1 of the Workplan, an additional 1,380-foot section of Stewart Creek located to the east of the Dallas North Tollway is to be included in the assessment area. Please provide a map indicating the off-site additional area to be assessed.
- 3) **Background Sampling:** Section 4.3 of the Workplan states that, "background sampling has been performed for an associated investigation (investigation of the former Exide facility and the investigation of buffer property surrounding that facility)", and that "additional background sampling is not proposed for this assessment." If you wish to use the background value on-site, please provide in the APAR a map of the background sample locations and a discussion regarding how it was determined that the locations are representative of background conditions for the Grand Park property.

- 4) **Target Chemicals of Concern:** Section 4.4 of the Workplan states that the each sample collected will be analyzed for total concentrations of arsenic, cadmium, lead, and selenium. Please note that the list of target chemicals of concern may need to be expanded based on historical use of the property (see comment #1) or if other potential impacts from off-site properties are identified.
- 5) **Proposed Area of Future Non-Residential Use:** Approximately 180 acres of the site is not platted for residential development and the proposed sampling frequency for the acreage is 2 samples per acre. Please confirm whether or not this portion of the property will be deed restricted for commercial/industrial land use.
- 6) **Ecological Assessment Comments:** Please see the attached comments provided by the TCEQ's Technical Support Section, regarding surface water and ecological concerns. In the APAR, please provide information responsive to these comments.
- 7) **Groundwater Assessment:** Section 4.4 of the Workplan states that the assessment activities will not include a groundwater investigation due to the anticipation that affected soils will be delineated to background or the MCL prior to the saturated zone being encountered. Because a VCP certificate of completion contains a release of liability for all contaminants in all media, a groundwater investigation on-site will be necessary. Locations of groundwater monitoring wells should be determined based on groundwater being potentially affected from off-site sourced affected groundwater, from maximum concentrations and depths of affected on-site soils determined during the assessment, and from locations of other on-site potential sources determined from the Phase I ESA (if applicable).
- 8) **Groundwater Classification:** Section 5.2 of the Workplan states that the first encountered groundwater bearing unit will be assumed to be a Class 2 resource. Please note that groundwater can only be assumed to be a Class 1 resource. Please refer to TCEQ Regulatory Guidance TRRP-8 *Groundwater Classification* (RG-366) for additional information on classification of the underlying groundwater bearing unit(s).
- 9) **Proposed Development:** Although not included in the Workplan, a link was provided to the Revised Master Plan for Grand Park, dated October 28, 2011. The Master Plan indicates that portions of Stewart Creek will become a recreational lake. As such, in addition to human health exposure pathways, the APAR should include evaluation of ecological and surface water exposure pathways in the area of the proposed lake.

Mr. G. Purefoy
Page 3
December 4, 2013
VCP No. 2592

A response to these comments is due by January 31, 2014. Please reference VCP No. 2592 on the front of any future letters or reports. Future submittals should be mailed to the TCEQ, VCP-CA Section, mail code MC-221, at the letterhead address. Please feel free to contact me with any questions or comments at (512) 239-3737.

Sincerely,


Joanna Manning, Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

JAM/jdm

cc: Mr. James L. Gandy, President, Frisco Economic Development Corporation,
Frisco, Texas

Mr. Wade Wheatley, Vice President, Cook-Joyce, Inc. wade.wheatley@cook-joyce.com

Mr. Mack Borchardt, City of Frisco, mborchardt@friscotexas.gov

Mr. Sam Barrett, Waste Section Manager, TCEQ Fort Worth/Dallas Regional Office, R-4

Enclosure: TCEQ Interoffice Memorandum from Larry Champagne dated December 3, 2013.

TCEQ Interoffice Memorandum

To: Joanna Manning, Project Manager; VCP/CA Section, Remediation Division

From: *LC* Larry Champagne, Ecological Risk Assessor; Division Support Section,
Remediation Division

Date: December 3, 2013

Subject: Grand Park Affected Property Assessment Work Plan

October, 2013

VCP ID No. 2592

I have completed my review of the ecological aspects of this work plan and have the comments below.

General Comments:

1. TCEQ has recently determined that the main segment of Stewart Creek is a perennial water body and should be evaluated as such. As a perennial water body, chronic water quality criteria apply, as do sediment protective concentration levels (PCLs) for the protection of the benthic invertebrate community. Tributaries to Stewart Creek, including the former path of this creek, are considered to be intermittent streams. As such, acute water quality criteria apply and benthic PCLs do not. However, if circumstances change such that these water bodies become perennial, then the application of chronic criteria and benthic PCLs would be appropriate.
2. An evaluation of the potential presence of threatened/endangered species should be conducted. The possibility exists that sediment may accumulate in locations within the main segment of Stewart Creek that could support mollusks including the threatened Texas heelsplitter and Louisiana pigtoe. In addition, habitat may exist for other protected species, including the threatened White-faced ibis. It is recommended that all of the protected species listed for Collin County be evaluated for potential occurrence within this site.

Specific Comments:

1. **P.5, 3.1 Surface Water Sampling in Stewart Creek:** The chronic surface water quality criteria for arsenic, cadmium, lead, and selenium apply in the main segment of Stewart Creek. Surface water samples collected from Stewart Creek should be analyzed using EPA method 6020 to ensure that detection limits are set at or lower than chronic criteria values.

TCEQ Interoffice Memorandum

2. P. 10, **4.5 Analytical Protocol:** In order to be consistent with Table 2, it should be specified that a portion of the surface water quality samples will be analyzed for dissolved concentrations of arsenic, cadmium, and lead, as the dissolved form is what the criteria are based upon.
3. **Figure 1:** The divisions in feet presented in the scale are inconsistent and should be corrected.