

Texas Commission on Environmental Quality
Remediation Division Correspondence Identification Form

SITE & PROGRAM AREA IDENTIFICATION			
SITE LOCATION		REMEDATION DIVISION PROGRAM AND FACILITY IDENTIFICATION	
Site Name: Grand Park Property		Is This Site Being Managed Under A State Lead Contract? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Address 1: 7275 Dallas Parkway		Program Area: VOLUNTARY CLEANUP PROGRAM	
Address 2:		Mail Code:	MC-214
City: Frisco	State: Texas	Is This A New Site To This Program Area? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Zip Code: 75034	County: Dallas	VCP No.: 2592	640
TCEQ Region: Region 4 - Dallas/Fort Worth		--Leave This Field Blank--	--Leave This Field Blank--

DOCUMENT(S) IDENTIFICATION	
PHASE OF REMEDIATION	DOCUMENT NAME
1. MISCELLANEOUS	TRANSMITTAL LETTER
2. MISCELLANEOUS	PHASE I ESA
3. MISCELLANEOUS	TECHNICAL WORKPLAN NOT OTHERWISE SPECIFIED (NOS)
4.	
5.	

CONTACT INFORMATION			
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TCEQ INTERNAL USE ONLY			
Document No.	TCEQ Database Term	Document No.	TCEQ Database Term
1.		4.	
2.		5.	
3.			

27 January 2014

Via Hand Delivery

Ms. Joanna Manning, Project Manager (MC-127)
Texas Commission on Environmental Quality (TCEQ)
VCP / Corrective Action Section
P.O. Box 13087
Austin, TX 78711-3087

Re: Response to TCEQ Comments and Transmittal Letter for Revised Documents, Grand Park, 7275 Dallas Parkway, Frisco, Texas, VCP #2592

Dear Ms. Manning:

Cook-Joyce, Inc. (CJI) has prepared this response on behalf of its clients, the City of Frisco and Russell & Rodriguez. This letter serves as a transmittal letter for a Revised Affected Property Assessment (APA) Workplan and a Phase I Environmental Site Assessment (ESA) for the Grand Park VCP Site (Site)

The changes to the Revised Workplan are based in part on the TCEQ's comments in your 4 December 2013 letter¹ documenting your review of the Grand Park APA Workplan² that was submitted for your review in October 2013. In addition, the revised Workplan also reflects our discussion during a 10 December 2013 conference call.

REQUEST FOR EXPEDITED REVIEW

The City of Frisco is currently in negotiations with a potential purchaser for the northeast field area of the Site. As such, CJI and the City of Frisco would greatly appreciate the TCEQ's efforts to facilitate the rapid assessment of that area.

To that end, CJI requests that the TCEQ provide a conditional approval of this Workplan for that area. A conditional approval will allow CJI to initiate sample collection in that area, evaluate the results, and (if warranted) pursue a partial response action area "closure" for that portion of the Site.

RESPONSE TO TCEQ COMMENTS

The TCEQ's comments in the 4 December 2013 review letter are provided below in italics; CJI's responses are provided after each comment or question.

- 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*

¹ 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. RN 106847114, TCEQ 4 December 2013

² Property Assessment Workplan for Grand Park, 7275 Dallas Parkway, Frisco, Texas, VCP #2592, CJI, dated October 2013.





identified in the Phase I ESA should be incorporated in the affected property assessment.

CJI recognizes that Site history is an integral part of an APAR. CJI had planned to provide a discussion of the Site's history and potential sources of impact from historical site uses in the APAR. However, to facilitate the approval of the Grand Park Workplan CJI has attached a Phase I ESA of the subject property. The Phase I ESA documents that there are two recognized environmental conditions (RECs) at the Site. Those RECs include the former Exide battery recycling facility and the discovery of two, previously unknown to the City, monitoring wells on the subject property.

- 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.*

This is a typographical error that has been corrected in the revised Workplan. That section of Stewart Creek has been included in a separate VCP Application, "Northeast Stewart Creek", that was submitted to the TCEQ on 3 December 2013.

- 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.*

This information will be provided in the APAR and the source material will be referenced. It is also provided in the attached Phase I ESA.

- 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.*

CJI and the City are unaware of any historical industrial uses of the subject property. There is a former on-site residence, and currently there is a concrete crushing operation located on the southwest side of the property. But, as the Phase I ESA concludes, neither of these uses is an REC for the Site.

Agricultural Chemicals

Based on historical information obtained for the Phase I ESA the Site has primarily been either farmland or pasture since the 1940s. Based on our 10 December 2013 discussion with the TCEQ, we understand that the TCEQ is concerned with residual herbicides and pesticides that may be present in the previously farmed portions of the Site.

The City notes that agricultural chemicals, such as herbicides, pesticides, fertilizers and defoliants, which may have been used on the Site are by TCEQ rule not considered a release or





waste disposal as long as their use was in accordance with respective label instructions. Such use is considered an application and is not regulated by the TCEQ. Therefore, the City does not believe the addition of herbicide and pesticide analyses to the Revised Workplan to be a regulatory necessity.

However, to address your concerns the City has requested that CJI add herbicide (EPA Method 8151A) and pesticide (Organochlorine Pesticides by EPA Method 8081) analyses to all of the samples obtained from the agricultural field located at the Site's northeast corner. CJI's observations and historical aerial photography suggest that this area has been the most consistently farmed portion of the property since the early 1940s. As such, it represents a "worst case" scenario for the presence of herbicides and pesticides.

The northeast field will be the first area CJI will collect surface soil samples from. Once obtained, the sample results from the northeast field will be used to evaluate the need to perform that level of analytical sampling in other areas of the Site. The results from that area will be shared with the TCEQ as soon as possible following their receipt and validation by CJI.

If herbicides are detected at concentrations above tier 1 residential PCLs for the northeast field, then CJI will modify the proposed analytical program to include herbicide analyses on samples collected from other historically cultivated portions of the Site.

Likewise, if pesticides are detected at concentrations above tier 1 residential PCLs for the northeast field, then CJI will modify the analytical program to include pesticide analyses in additional areas.

If neither type of chemical is detected at concentrations above critical PCLs, then these analyses will not be performed as part of the general sampling program, but will still be performed in target areas, such as in the vicinity of the former farmhouse that is located on the subject property (see below).

Additional Analyses Proposed for Specific Areas of Site

In addition to the herbicide and pesticide analyses proposed for the northeast field, CJI proposes to perform additional analyses in several target areas. Those areas include:

- Soil samples collected adjacent to the former on-site farmhouse, barn, and associated structures will be analyzed for the following:
 - Target metals (arsenic, cadmium, lead, and selenium) by EPA Method 6020.
 - Total Petroleum Hydrocarbon (TPH) analyses by Texas Method 1005. If necessary TPH concentrations will be speciated using Texas Method 1006.
 - Herbicides (EPA Method 8151A) and Organochlorine Pesticides (EPA Method 8081).
- Soil that was previously at the ground surface in the TBK Materials lease area has been scraped up and used to form berms that border the area to the southwest and south. The surface soil has been replaced with gravel, which has been used to pave this area. There are also several diesel ASTs and oil/hydraulic fluid drums located in the southwest





corner of this area. CJI proposes to sample the TBK Materials lease area in the following manner:

- CJI will select 3 different locations adjacent to the diesel ASTs and oil/hydraulic fluid drums to collect samples. Those locations will be selected based on indications of a potential release. Although no stained gravel was observed during the Phase I ESA, CJI will reevaluate the area for stained gravel, absorbent on the ground, or other indications of a release. Likely areas where there could have been a release, such as under a dispenser hose, will also be evaluated. CJI will dig past the gravel at the surface and collect samples of soil immediately underlying the gravel. The soil samples will be analyzed for target metals (arsenic, cadmium, lead, and selenium by EPA Method 6020), TPH (Tx Method 1005 and potentially 1006), and Polycyclic Aromatic Hydrocarbons (PAHs) by EPA Method 8270.
- CJI will install 12 test pits in the berm located to the southwest and south of the lease area. One sample will be obtained from each test pit. Each of those samples will be analyzed for target metals. Four of the samples will also be analyzed for herbicides and pesticides using the previously mentioned analytical methods.
- Surface water drains through silt fencing from the lease area's southeast corner. CJI proposes to collect 1 surface water sample and 1 surface soil sample from that location. Both samples will be analyzed for RCRA 8 Metals³ (using EPA Methods 6020/7470/7471), TPH, and PAHs.

Finally, CJI also plans on evaluating the need to add additional COCs to the analyte list during the initial phase of sample collection. Currently, a significant number of soil samples are proposed for the Site. CJI personnel will traverse back and forth across the property multiple times while collecting these samples. CJI will document observations made during this process and will update the TCEQ if items are noted that would require a change in the target COCs or the Workplan.

- 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.*

CJI proposes using a modified exposure area in the portion of Grand Park that will be redeveloped as a park. We believe a modified exposure area is justified based on the following:

Current and Future Uses of the Park Area

- No existing residences and no platted residential properties currently exist on that area of the Site.
- The City of Frisco will restrict the future construction of residential properties in that area through the use of a deed recorded development restriction.

³ Arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver.
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L140127_TCEQ RESPONSE TO APA WORKPLAN





- Open areas are proposed for the park. The use of the park will not be limited to a small area (such as the back yard of a home). Therefore, exposure scenarios based on chronic exposures to a contaminant in a small area are not applicable to the Site.

Contamination Pathways at Grand Park

- It is documented that Stewart Creek has been impacted by the former Exide facility.
- It is considered unlikely that significant impacts originating from the former Exide facility will be discovered in upland areas of Grand Park. This is based on the following lines of reasoning:
 - Wind direction - According to wind roses for the Dallas/Fort Worth area (<http://www.tceq.texas.gov/airquality/monops/windroses.html>) the Site is crosswind from the former Exide facility (the primary emission source in the area). Airborne impacts originating from the former Exide facility are considered the primary mechanism by which surface soil could have been contaminated at the Site. Based on the wind roses CJI considers it unlikely that upland portions of the Site would have been significantly impacted by airborne deposition from the former Exide facility.
 - The Site was not owned or controlled by Exide or its predecessors.

Investigation Specifics

- Extensive investigation activities and intensive sampling and delineation of potential source areas both on and off the Site will be conducted.
- The Site-specific PCL for lead, which is considered the primary contaminant of concern at the Site, is 250 milligrams per Kilogram (per City directive). This is ½ of the residential ^{Tot}Soil_{Comb} PCL, which is anticipated to be the critical PCL for lead at the Site. This will result in more conservative delineation and remediation efforts at the Site than would otherwise be regulatorily required.
- In addition to grid sampling, targeted sampling will be performed in specific areas if battery chips or slag are observed by CJI field personnel.
- CJI will statistically evaluate the samples taken in the future park area. CJI expects to demonstrate that COCs (if present) are relatively homogeneous over an area larger than the residential default size in accordance with 30 TAC 350.51(l)(3).

Based on this information CJI believes that a modified exposure area and a reduced sampling frequency is warranted in the future park area within the overall Site.

- 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.*
 - a. *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.

CJI will address these requirements in the APAR or as otherwise agreed to by the TCEQ as part of an overall Stewart Creek investigation/remediation.

- b. 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.*

CJI will address these requirements in the APAR or as otherwise agreed to by the TCEQ as part of an overall Stewart Creek investigation/remediation.

- c. **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.*

CJI has revised Table 3 of the Workplan to document that EPA Method 6020 will be used to analyze the water, sediment, and soil samples collected during this project.

- d. **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.*

CJI has revised that section in accordance with your request.

- e. **Figure 1:** The divisions in feet presented in the scale are inconsistent and should be corrected.*

CJI has corrected the scale for Figure 1 and has provided the corrected figure in the attached Revised Workplan.

- 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).

As documented in the Revised Workplan, CJJ proposes installing multiple monitoring wells on the subject property. Groundwater samples obtained from the monitoring wells will be analyzed for target metals at a minimum. Additional analyses may also be proposed based on the location of the monitoring well and the contaminants reported on-Site.

- 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).*

CJJ acknowledges your comment and will address this in the APAR.

- 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.*

CJJ acknowledges your comment. As discussed during our 10 December 2013 teleconference, we understand that “today’s soil is tomorrow’s sediment” in relation to the lakes that will be excavated and constructed along the current path of Stewart Creek. Therefore, CJJ proposes to install 27 borings along the future path of the proposed lakes to assess the soil that will become the base or sidewalls of the lakes once they are developed. CJJ proposes the following scope of work while installing those borings:

- Based on elevations provided by Jacobs Engineering, the planned elevation of the bottom of the lakes is approximately 577.5 feet above mean sea level (amsl). Sidewalls of the lakes are relatively steep. In the event that a boring is installed to assess a sidewall of the proposed lakes, the specific sidewall elevation for that area will be determined prior to installing the boring. The planned excavation is provided on Figures 3 through 9 of the attached Workplan. Proposed boring locations are provided on Figure 8 of the Workplan.
- While future planned depths within the lakes are known, the ground surface at Grand Park is not (no current topographic survey exists). Therefore, CJJ will determine the base elevation of each boring location using Trimble GPS units that meet TCEQ requirements. CJJ staff have been trained, and received training certificates in accordance with TCEQ Guidance, in the use of these GPS units. Finally, the GPS units will be real time corrected to aid determining an accurate elevation.
- Once the elevation at each boring location has been determined, CJJ will install a boring using a Geoprobe™ or similar direct push technology drilling rig. CJJ will log the lithology of the boring and field screen core samples. Absent other indications of contamination (such as an elevated Organic Vapor Meter [OVM] measurement), CJJ will collect soil samples from the two, 2-foot intervals that most closely correspond to a sample elevation of 577.5 feet amsl or the elevation of the sidewall of the lake (depending on the location of the boring). For example, if the ground surface is 590 feet amsl, then CJJ will





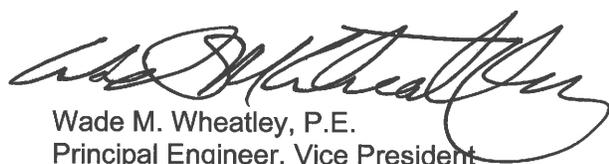
collect soil samples from 10-12 feet bgs (578-580 feet amsl) and 12-14 feet bgs (576-578 feet amsl) for laboratory analysis.

- Both samples will be analyzed for target metals. If significant surficial contamination of other COCs is discovered, or if indicated by field screening, then additional analyses may also be performed on these samples.

CLOSING

We hope this information fully responds to your comments on the Grand Park Workplan. Please contact the undersigned with questions or comments. We can be reached at 512/474-9097 or by email at wade.wheatley@cook-joyce.com or richard.varnell@cook.joyce.com.

Sincerely,



Wade M. Wheatley, P.E.
Principal Engineer, Vice President



Richard D. Varnell, P.G.
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