



September 3, 2019

Project No. 30401358

Ms. Maureen Hatfield

Texas Commission on Environmental Quality
MC-127
VCP-CA Section, Team 1, Remediation Division
P.O. Box 13087
Austin, Texas 78711-3087

**RE: MONTHLY STATUS UPDATE – ENGLEWOOD INTERMODAL YARD – NAPL COLLECTION SYSTEM/CONCRETE CAP REPAIRS
UNION PACIFIC RAILROAD HOUSTON WOOD PRESERVING WORKS FACILITY
4910 LIBERTY ROAD FACILITY, HOUSTON, TEXAS
POST-CLOSURE CARE PERMIT NO. HW-50343; INDUSTRIAL SWR NO. 31547**

Dear Ms. Hatfield:

Golder Associates, Inc. (Golder), on behalf of Union Pacific Railroad Company (UPRR), is pleased to provide this monthly status update for August 2019 for the implementation of the cap repairs identified in the Updated Post-Response Action Care Report (PRACR) dated January 16, 2018 for the UPRR Houston Wood Preserving Works Facility (the Site). Monthly status updates were requested by the Texas Commission on Environmental Quality (TCEQ) in a letter dated March 20, 2018. A brief description of the current status of the repairs is provided below:

The non-aqueous phase liquid (NAPL) Collection System was installed in the Englewood Intermodal Yard to address the tar-like substance seeps within parking slots B100 to B109 (for container trailers). The following is a summary of the observations from the weekly inspections of the NAPL Collection System for August (photographs of from the weekly inspections are provided in Attachment A):

- No significant amount of NAPL has been visually observed within the three NAPL collection sumps (Sump 1 (B099/B100 slots), Sump 2 (B103/B104 slots), and Sump 3 (B107/B108 slots)). However, as discussed in the April 2019 update, water has collected within the NAPL collection sumps. The water in Sump 1 was observed as being dark brown in color (no odor or observable characteristics of petroleum hydrocarbons were observed). The water in the sumps was first pumped down in May (May 9 and May 24, 2019) where some NAPL was recovered and transferred to a frac tank during the May 24th pump down. Based on the presence of NAPL in the recovered fluids, the recovered fluids were considered recyclable and transported to the Intergulf Corp. Facility in Pasadena, TX for recycling. Another pump down of the sumps was conducted on July 25, 2019. The frac tank was removed from the Site following the July 2019 pump down. Copies of the bill of lading for recycling of the recovered fluids from the May and July pump down are provided in Attachment B.

Golder Associates Inc.
2201 Double Creek Dr, Suite 4004, Round Rock, Texas, USA 78664

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Another frac tank was set up near Slot B109 on August 21, 2019 to allow more frequent pump downs of the sumps. A pump down of the sumps was conducted on August 27, 2019. During the pump down of Sump 1 (B099/B100), the recovered water was observed to be brown in color with a sheen. The water recovered from Sumps 2 (B103/B104) and 3 (B107/B108) was noted to be clear with a brown tint, but no sheen was observed on the water. Approximately 6,500 gallons of fluids were pumped from the three sumps and stored in the on-site frac tank.

- A small amount of tar-like material was noted adjacent to the NAPL Collection System at Slot B103 during the August 14th inspection (Photograph 24). No other seeps were noted around the NAPL Collection Systems, including the area on the south end of stall B106 along the concrete joint with the NAPL Collection System where the tar-like material had been previously noted.
- For areas outside the NAPL Collection System, very small amounts of tar-like material were noted near or within stalls B013, B057, B096, B101, B102, B105, and B108 where previous seeps have been observed. The small amount of observed tar-like material was scrapped up and placed on a drum on site. Approximately 2.5 gallons of the tar-like material was recovered during August.
- As discussed in the June 2019 update, areas of brown stains on the concrete pavement and evidence of seeps of a dark brown to black oily looking water were observed along cracks in the pavement and low-lying areas. The staining and seeps were observed throughout the B-Row (predominately in the B090 – B098 area) but were also observed within the A-Row and C-Row. Beginning in late May, UPRR contractor United States Environmental Services (USES) was called to the Site to pressure wash the areas and collect the fluids, which were placed in a tote on site. USES returned to the site about weekly or every other week through July 2, 2019, when most of the water seeps had dried up or were too small to be recovered with a vacuum truck. During the weekly inspections, small amounts of the black oily looking water was noted in some cracks in the pavement and concrete with a few puddles observed near Slots A091 and A101. However, the amount of water had decreased compared to areas observed in May and June. Little to no water was observed during the August weekly inspections, indicating that the water seeps may be seasonal depending on rainfall.

As part of evaluating potential responses to address the seep water, the area of the Englewood Intermodal Yard where the water seeps have been previously observed was surveyed to assess the topographic elevations and surface gradients in this area.

Weekly site inspections of the NAPL Collection System and Englewood Intermodal Yard concrete pavement near the collection system will continue to be conducted. In response to the TCEQ letter dated August 9, 2019, a notation on the presence of NAPL in each sump and tabulation of depth and thickness of NAPL if detected, and a tabulation of total contaminant mass of NAPL recovered from each sump will be provided. Except for the NAPL recovered during the May 2019 pump down, nothing other than a sheen has been measured in the three sumps.

If you have any questions or need additional information, please feel free to call me at (512) 671-3434 or Mr. Kevin Peterburs of UPRR at (414) 267-4164.

Sincerely,

Golder Associates Inc.



Eric C. Matzner, P.G.
Principal / Program Leader

ECM

CC: Mr. Kevin Peterburs, UPRR – Milwaukee, WI
Ms. Alma Jefferson, Waste Section Manager, TCEQ Region 12, Houston

Attachment Weekly Inspection Photolog
NAPL Collection System Recovered Fluid Bill of Ladings (July 2019)

j:\1358 - uprr houston preserving works\6 deliverables\prac\tceq comment letter\2019 august monthly update\houston, tx - wood preserving works - swr 31547 - monthly status update - cap repairs 20190903.docx

ATTACHMENT A

Weekly Inspection Photolog



Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
1

Date:
08/01/19

Description:

NAPL Collection Sump at B108:

View of B107/B108 NAPL Collection Sump, looking north.



Photo No.
2

Date:
08/01/19

Description:

Slot A022:

View of slot A022 looking southeast, very little tar-like material observed in asphalt crack.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving
Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
3

Date:
08/01/19

Description:

Slot B057:

View of slot B057, very little tar-like material observed in cracks in the asphalt.



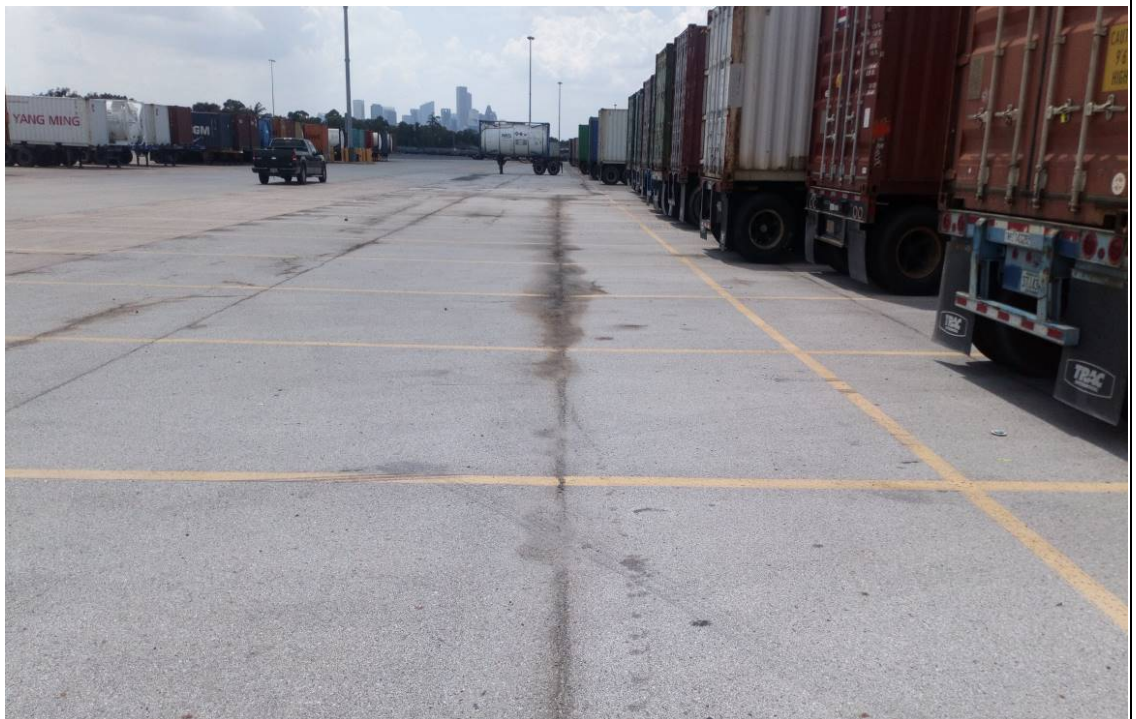
Photo No.
4

Date:
08/01/19

Description:

Slots B086-B100:

View of Slots B086 through B100, looking west, some brown staining along asphalt cracks, no standing water observed.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving
Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
5

Date:
08/01/19

Description:

Slots B098:

View of Slot B098, looking north, brown staining along cracks in the asphalt, no standing water observed.



Photo No.
6

Date:
08/01/19

Description:

Slot B101:

View of slot B101 looking southwest, tar-like material observed in cracks in the asphalt.





Client Name:
Union Pacific Railroad

Site Location:
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Project No.
 19119232

Photo No.
7

Date:
 08/01/19

Description:

Slot B105:

View of slot B105 looking north, tar-like material observed in asphalt crack.



Photo No.
8

Date:
 08/01/19

Description:

Slot B108:

View of slot B108, little tar-like material observed in asphalt cracks.





Client Name:
Union Pacific Railroad

Site Location:
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Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
9

Date:
08/01/19

Description:

B099 NAPL Collection

Sump:

View of B099 Sump
note brown stained
water in the sump, no
sheen noted.



Photo No.
10

Date:
08/01/19

Description:

Slot A101:

View of slot A101 (north
of B101), looking north,
small amount of
standing water with
brown staining.





Client Name:
Union Pacific Railroad

Site Location:
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 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
11

Date:
 08/08/19

Description:

Slot A021:

View of slot A021
 looking south, tar-like
 material observed in
 joint.



Photo No.
12

Date:
 08/08/19

Description:

Slot B013:

View of slot B013
 looking north, v. little
 amount of tar-like
 material observed in
 asphalt crack.





Client Name:
Union Pacific Railroad

Site Location:
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 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
13

Date:
 08/08/19

Description:

Aisle Between B and C Slots:

View of the aisle between B and C slots near slot B088, dark brown water and brown staining along concrete joints.



Photo No.
14

Date:
 08/08/19

Description:

Slot B096/A096:

View of well MW-85C, between slot B096 and A096, looking north, brown staining along joints and asphalt cracks.





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Project No.
 19119232

Photo No.
15

Date:
 08/08/19

Description:

Slot B098:

View of slot B098, brown staining along asphalt cracks, note small amount of dark brown oily substance in spots.



Photo No.
16

Date:
 08/08/19

Description:

Slots B099-B109:

View of slots B099 to B109, three sumps in view, looking southwest.





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Site Location:
 Englewood Intermodal Yard/Houston Wood Preserving Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
17

Date:
 08/08/19

Description:

Slot B102:

View of slot B102, tar-like material observed in pothole in asphalt.



Photo No.
18

Date:
 08/08/19

Description:

B103/B104 NAPL Collection Sump:

View of B103/B104 Sump, no sheen or odor noted in the water collected in the sump.





Client Name:
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Site Location:
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 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
19

Date:
 08/08/19

Description:

Slot B105:

View of slot B105, tar-like material seep from crack in asphalt.



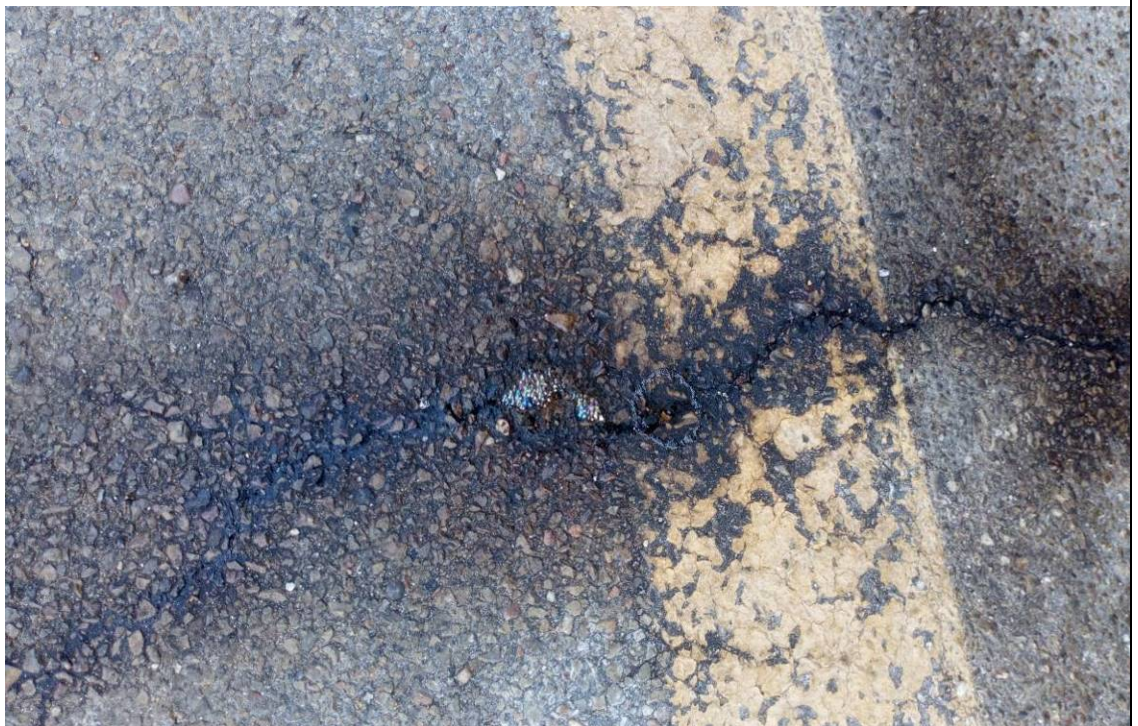
Photo No.
20

Date:
 08/08/19

Description:

Slot A102:

View of slot A102, brown staining along asphalt crack, brown water with sheen bubbling up from crack, no odor noted.





Client Name:
Union Pacific Railroad

Site Location:
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Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
21

Date:
08/14/19

Description:

Slot A022:

View of slot A022
looking southeast, tar-
like material observed
in asphalt crack.



Photo No.
22

Date:
08/14/19

Description:

B099/B100 NAPL
Collection Sump:

View of B099/B100
Sump, dark brown
water, no sheen or odor
noted in the water
collected in the sump.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving
Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
23

Date:
08/14/19

Description:

Slots B094-B109:

View of slots B094 through B109, looking southwest, some brown staining along asphalt cracks, no standing water observed but small amount of brown water noted in cracks.



Photo No.
24

Date:
08/14/19

Description:

Slot B103:

View of slot B103, tar-like material along seam near NAPL collection system excavation.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving
Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
25

Date:
08/14/19

Description:

Slot B108:

View of slot B108, tar-like material observed in asphalt cracks.



Photo No.
26

Date:
08/21/19

Description:

**B103/B104 NAPL
Collection Sump:**

View of B103/B104
NAPL Collection Sump, no odor or sheen noted
in the water collected in
the sump.





Client Name:
Union Pacific Railroad

Site Location:
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Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
27

Date:
08/21/19

Description:

Slot B013:

View of slot B013 looking north, small amount of tar-like material observed in asphalt crack.



Photo No.
28

Date:
08/21/19

Description:

Slot B105:

View of slot B105, tar-like material observed in asphalt cracks.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
29

Date:
08/21/19

Description:

Slot B096:

View of slot B096, tar-like material observed along asphalt/concrete joint.



Photo No.
30

Date:
08/21/19

Description:

Slot B014:

View from Slot B014 looking southwest, some brown staining along asphalt cracks, no standing water observed.





Client Name:
Union Pacific Railroad

Site Location:
Englewood Intermodal Yard/Houston Wood Preserving Works, 4910 Liberty Road, Houston, Texas

Project No.
19119232

Photo No.
31

Date:
08/21/19

Description:

Slot B057:

View of slot B057, tar-like material in asphalt cracks.



Photo No.
32

Date:
08/21/19

Description:

Slot B110:

View of frac tank set up in Slot B110 for temporary storage of fluids pumped from the sumps, looking west.





Client Name:
Union Pacific Railroad

Site Location:
 Englewood Intermodal Yard/Houston Wood Preserving
 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
33

Date:
 08/28/19

Description:

**B099/B100 NAPL
 Collection Sump:**

View of the B099/B100
 NAPL Collection Sump
 water recharge the day
 after a pumpdown
 event, dark brown
 water with sheen and
 no odor noted. No
 NAPL noted in sump.



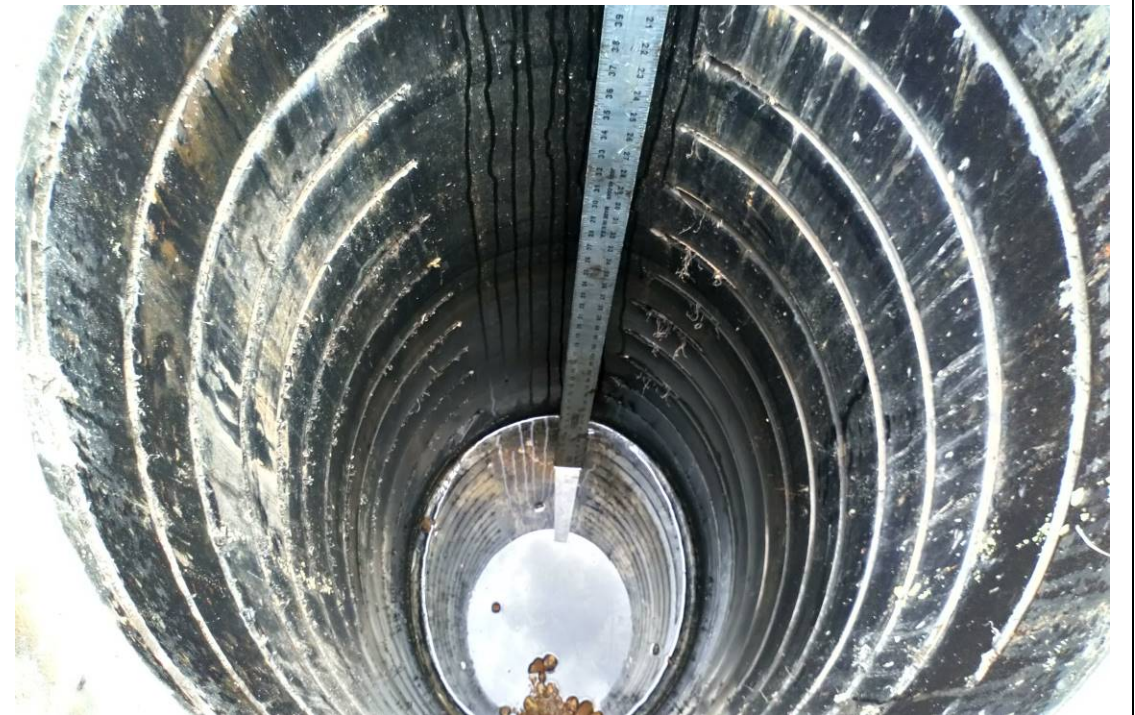
Photo No.
34

Date:
 08/28/19

Description:

**B103/B104 NAPL
 Collection Sump:**

View of the B103/B104
 NAPL Collection Sump
 water recharge the day
 after a pumpdown
 event, clear water no
 sheen or odor noted.
 No NAPL noted in
 sump.





Client Name:
Union Pacific Railroad

Site Location:
 Englewood Intermodal Yard/Houston Wood Preserving
 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
35

Date:
 08/28/19

Description:

**B107/B108 NAPL
 Collection Sump:**

View of the B107/B108
 NAPL Collection Sump
 water recharge the day
 after a pumpdown
 event, clear water no
 sheen or odor noted.
 No NAPL noted in
 sump.



Photo No.
36

Date:
 08/28/19

Description:

Slot B102:

View of Slot B102, tar-
 like material observed
 along joint.





Client Name:
Union Pacific Railroad

Site Location:
 Englewood Intermodal Yard/Houston Wood Preserving
 Works, 4910 Liberty Road, Houston, Texas

Project No.
 19119232

Photo No.
37

Date:
 08/28/19

Description:

Slot A010:

View of Slot A010, very little amount of tar-like material observed in joint.



Photo No.
38

Date:
 08/28/19

Description:

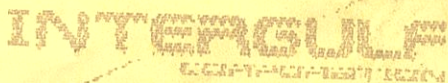
NAPL Collection System:

View of Slots B103-B109, looking south from B103, NAPL collection system excavation area.



ATTACHMENT B

**NAPL Collection System
Recovered Fluid Bill of Ladings
(July 2019)**



10020 Bayport Blvd.
Pasadena, Texas 77507
Phone (281) 474-4210

P.O. Box 100
Laporte, Texas 75850
Fax (281) 694-1500

Original - Shipper Provided Short Form Straight Bill of Lading - Not Negotiable - Domestic
RECEIVED, subject to the contract in effect on the date of the issue of this Bill of Lading.

Shipper: UNION PACIFIC RAILROAD
1400 DOUGLAS STREET - STOP 1030
OMAHA, NE 68179

Ship Date: Friday, July 19, 2019
Delivery Date: Friday, July 19, 2019

Bill of Lading Number:
357762

The property described below, in apparent good order, except as noted (content and condition of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this document as meaning any person or corporation authorized to be in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. This Bill of Lading is a receipt for goods; it is not of itself a contract of carriage. It is mutually agreed, as to each carrier of all or as to any said over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions contained in the applicable contract between shipper and carrier or intermediary. For payment: Charges to be billed to Shipper or the "Billed to" party are set forth in the governing contract with Shipper. No charges other than those contained therein may be billed to Shipper or the "Billed to" party without prior written consent of Shipper. The extra copy of this Bill of Lading, furnished at the time of shipment, must be attached to the freight bill submitted to Shipper or the "Billed to" party and sent to:

Consigned To:
Intergulf - Lonestar Ecology
12901-A Bay Park Rd.
Pasadena, TX 77507

Carrier: Intergulf Corporation

Freight Terms:
Prepaid FOB Point

Truck Number: -820

Trailer Number: 143

Tank Number:

Delivery / Release Number:

This is to certify that the product stated below are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. If this Shipment moves between to ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight". Intermodal Certification: All information required by Federal Highway Administration regulations at 49 C.F.R. 390.54 implementing the Intermodal Safe Container Act of 1992 is set forth on the face of this bill of lading. The shipper name herein is the tendering party.

FOR CHEMICAL EMERGENCY CALL : CHEMTREC @ (800) 424-9300

Hazmat: Number:		Package Type:	Description of Materials, Special Marks and Exceptions:	Shipping Weight:
X	1	Cargo tanks (tank)	UN1993, Flammable liquids, n.o.s., (Benzene), 3, PG III	45,000.00 Lbs *Subject to correction

IGC Profile Number : 09472

ERG #: 128

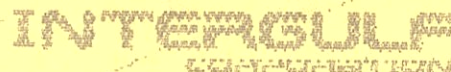
5,000 GAL

WR# 22077

Gross Weight	
Tare Weight	
Net Weight	
Weigh Ticket No	

Placards to be supplied by Carrier

Shipper: UNION PACIFIC RAILROAD	Carrier: Intergulf Corporation
Per: [Signature]	Per: John Griffin [Signature]
Date: Friday, July 19, 2019	Date: Friday, July 19, 2019



10020 Bayport Blvd.
Pasadena, Texas 77507
Phone (281) 474-4210

P.O. Box 1580
Laporte, Texas 77572
Fax (281) 694-1955

Original - Shipper Provided Short Form Straight Bill of Lading - Not Negotiable - Domestic
RECEIVED, subject to the contract in effect on the date of the issue of this Bill of Lading.

Shipper: UNION PACIFIC RAILROAD

1400 DOUGLAS STREET - STOP 1030
OMAHA, NE 68178

Ship Date: Thursday, July 25, 2019

Delivery Date: Thursday, July 25, 2019

Bill of Lading Number:

358576

The property described below, in apparent good order, except as noted (content and condition of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this document as meaning any person or corporation authorized to be in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. This Bill of Lading is a receipt for goods; it is not of itself a contract of carriage. It is mutually agreed, as to each carrier of all or as to any said overall or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions contained in the applicable contract between shipper and carrier or intermediary. For payment: Charges to be billed to Shipper or the "Billed to" party are set forth in the governing contract with Shipper. No charges other than those contained therein may be billed to Shipper or the "Billed to" party without prior written consent of Shipper. The extra copy of this Bill of Lading, furnished at the time of shipment, must be attached to the freight bill submitted to Shipper or the "Billed to" party and sent to:

Consigned To:
Intergulf - Lonestar Ecology
12901-A Bay Park Rd.
Pasadena, TX 77507

Carrier: Intergulf Corporation - DO NOT USE

Freight Terms:
Prepaid FOB Point

Truck Number: ~~927~~ 822

Trailer Number: 169

Tank Number:

Delivery / Release Number:

This is to certify that the product stated below are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. If this Shipment moves between to ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight". Intermodal Certification: All information required by Federal Highway Administration regulations at 49 C.F.R. 390.54 implementing the Intermodal Safe Container Act of 1992 is set forth on the face of this bill of lading. The shipper name herein is the tendering party.

FOR CHEMICAL EMERGENCY CALL : CHEMTREC @ (800) 424-9300

Hazmat: Number:	Package Type:	Description of Materials, Special Marks and Exceptions:	Shipping Weight:
X	1 Cargo tanks (tank)	UN1993, Flammable liquids, n.o.s., (Benzene), 3, PG III	45,000.00 Lbs *Subject to correction

IGC Profile Number : 08472

ERG #: 128

WR# 22097

Gross Weight	
Tare Weight	
Net Weight	
Weigh Ticket No	

Est. Qty 5,000 US Gals

Placards to be supplied by Carrier

Shipper: UNION PACIFIC RAILROAD	Carrier: Intergulf Corporation - DO NOT USE
Per: <i>Curtis Curtis</i> 7-25-19	Per: Rene Gonzales <i>Rene Gonzales</i>
Date: Thursday, July 25, 2019	Date: Thursday, July 25, 2019