



January 20, 2021

Project No. 19119232

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 December 2020 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.

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 and Englewood Intermodal Yard concrete pavement near the collection system for December 2020 (photographs from the weekly inspections are provided in Attachment A):

- No NAPL has been visually observed or recovered from Sump 1 (B099/B100 slots), Sump 2 (B103/B104 slots), or Sump 3 (B107/B108 slots) during the month of December. Water continues to accumulate in the NAPL collection sumps.
- All three Sumps were last pumped down on September 1, 2020 and the recovered water is stored in the on-site frac tank. Water levels in Sumps 1, 2, and 3 fluctuated in December, decreasing from their November 2020 levels to 5, 10.5, and 10 inches from the top of the sumps, respectively, by December 10, 2020 and recovering to 0, 4, and 3.5 inches from the top of the sumps, respectively, by December 31, 2020. The water in Sumps 1, 2, and 3 was observed as being brown in color. No sheen or odor was reported during the inspections in the month of December.

- No tar-like NAPL seeps were observed within the NAPL Collection System area during the month of December. For areas outside the NAPL Collection System, very small amounts of tar-like material were consistently noted in the joint in stall B102 where previous seeping has been observed. A very small amount of tar-like material was observed on the concrete surface once in stall B101 during the December 23, 2020 inspection and once in stall B105 during the December 30, 2020 inspection where previous seeps have been noted. The overall amount of tar-like material removed from the concrete surface during December 2020 was less than 0.25 gallons.
- No widespread seep water was observed in the paved areas during the December 2020 inspections. UPRR will continue to have USES pressure wash the areas where the brown staining and seeps are observed as needed. Recovered wash water stored in a tote from previous events was removed from site by UPRR contractor NRC on November 30, 2020 and taken to Seabreeze Landfill for disposal. The final manifests are provided in Attachment B.
- During the week of July 13, 2020, Golder, on behalf of UPRR, coordinated with USES to excavate seven test pits in areas where historical NAPL seeps (Slots A010, A021, A098, B013, B057, B096, and B108) had been observed in the Englewood Intermodal (IM) Yard. During the December 2020 weekly inspections, no NAPL seeps have been observed at the test pit locations. The test pit locations will continue to be inspected on a weekly basis, and Golder, on behalf of UPRR, will prepare the Englewood IM Yard Test Pit Evaluation Report of the test pit findings including weekly inspections for submittal to the TCEQ following the pilot test period (ending at the end of January 2021) specified in the Response Action Plan (RAP) (August 31, 2020).
- During the inspection on December 30, 2020, a small area of localized staining was observed at the northern joint of Slot A017 (Photo 25), which is likely residual staining from the maintenance activities on a container crane noted in September 2020.
- On December 8, 2020, GPRS was subcontracted to perform a camera survey on the storm sewer pipes in the Intermodal Yard as part of the Englewood IM Yard Test Pit Evaluation. The camera was unable to advance the full length of several drainpipes due to build-up of sediments and deposits (e.g., mud) within the drainpipes. A sheen was observed upon disturbance of the deposits and booms were placed in the catch basins as a precautionary measure. Golder, on behalf of UPRR, coordinated with USES to remove the obstructions within sections of the storm system on December 21 and 22, 2020. Water and material from the obstruction removal effort were placed in two vacuum boxes and stored onsite in stalls C129 and C131 (Photo 31). Used booms from the obstruction removal effort were placed in a 55-gallon drum and stored onsite with the vacuum boxes (Photo 32). Another camera survey is scheduled in January 2021. Details on the camera and obstruction removal activities will be provided in the Englewood IM Yard Test Pit Evaluation Report indicated above.

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, tabulation of depth and thickness of NAPL if detected, and a tabulation of total mass of NAPL recovered from each sump is provided on the enclosed Table 1. No measurable NAPL has been detected in the sumps using the interface probe through December 2020.

If you have any questions or need additional information, please feel free to call us 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



Eric Pastor, P.E.
Principal / Program Leader

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

Attachment Table 1 – NAPL Measurements – NAPL Collection System Sumps
Weekly Inspection Photolog
Waste Manifests

TABLE

TABLE 1
NAPL Measurements - NAPL Collection System - Englewood Intermodal Yard
UPRR Houston, tx - Wood Preserving Works

Measured Date	Sump 1 (B099/B100) Freeboard (in)	Sump 2 (B103/B104) Freeboard (in)	Sump 3 (B107/B108) Freeboard (in)	Depth to DNAPL (in)	Comments
8/14/2019	2.5	28	29	Not measurable	
8/21/2019	0	27.5	26.5	Not measurable	
8/28/2019	44.5	47.9	45	Not measurable	Water from sumps pumped out
9/4/2019	19	42	41.5	Not measurable	
9/13/2019	0	39.5	38	Not measurable	
9/20/2019	0	3	2.5	Not measurable	
9/25/2019	0	42	42.5	Not measurable	Water from sumps pumped out
10/2/2019	2.5	42.5	42	Not measurable	Sheen visible in B107/B108 sump, less than 0.1 gal of DNAPL recovered
10/9/2019	3	42	41.5	Not measurable	Sheen visible in B107/B108 sump, less than 0.1 gal of DNAPL recovered
10/16/2019	0	39.5	39	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
10/24/2019	3	35	25	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
10/29/2019	0	24	23	Not measurable	Water from sumps pumped out
10/30/2019	0	40	39	Not measurable	Slight sheen visible in B107/B108 sump
11/6/2019	9	39	38.5	Not measurable	
11/13/2019	7	30	29	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
11/19/2019	4	26	25.5	Not measurable	
11/27/2019	0	25	23	Not measurable	
12/3/2019	2	25.5	25	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
12/11/2019	1.5	17	16.54	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
12/17/2019	5	19.5	17.5	Not measurable	
12/23/2019	10	21	20.5	Not measurable	
1/7/2020	9	13	12.5	Not measurable	
1/8/2020	9	13	12.5	Not measurable	Water from sumps pumped out
1/17/2020	0	32	31.5	Not measurable	
1/21/2020	2.5	26.5	26	Not measurable	
1/28/2020	0	0	0	Not measurable	
2/4/2020	2	11	10.5	Not measurable	
2/12/2020	0	0	0	Not measurable	
2/18/2020	1.5	11.5	10.25	Not measurable	Water from sumps pumped out on 2/20/2020
2/27/2020	2	42	36	Not measurable	
3/6/2020	1	36	36	Not measurable	
3/11/2020	2	36	35.5	Not measurable	
3/18/2020	0	35.5	35	Not measurable	
3/27/2020	0	29	28	Not measurable	
4/3/2020	1.5	29	28.5	Not measurable	
4/8/2020	0	23	22	Not measurable	
4/15/2020	0.5	23	22	Not measurable	
4/21/2020	0	21	21	Not measurable	
4/28/2020	0	23	22	Not measurable	
5/4/2020	-	-	-	Not Measured	Measurements were not taken; the inspector was unable to open the sumps
5/12/2020	0	20	19	Not measurable	
5/19/2020	0	15.75	14.25	Not measurable	Sump 1 pumped down (May 22nd)
5/27/2020	0	14	13	Not measurable	
6/1/2020	0	7	5	Not measurable	
6/10/2020	0	10	9	Not measurable	
6/17/2020	1	12	11	Not measurable	
6/25/2020	0	0	0	Not measurable	
6/30/2020	0	0	0	Not measured	
7/1/2020	48	46	47	Not measurable	Sumps 1, 2, & 3 pumped down

TABLE 1
NAPL Measurements - NAPL Collection System - Englewood Intermodal Yard
UPRR Houston, tx - Wood Preserving Works

Measured Date	Sump 1 (B099/B100) Freeboard (in)	Sump 2 (B103/B104) Freeboard (in)	Sump 3 (B107/B108) Freeboard (in)	Depth to DNAPL (in)	Comments
7/8/2020	34	24.5	24	Not measurable	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
7/15/2020	32	29.5	29	Not measurable	Sheen visible in B99/B100 sump & B107/B108 sump, less than 0.1 gal of DNAPL recovered B107/B108 sump
7/23/2020	0	23	22.5	Not measured	Less than 0.1 gal of DNAPL recovered from B107/B108 Sump
7/31/2020	0	11	10	Not measurable	
8/5/2020	0	7	5	Not measurable	
8/13/2020	1	11	10	Not measurable	
8/19/2020	0	7	6	Not measurable	
8/26/2020	0	10	9	Not measurable	
9/2/2020	43	37	38	Not measurable	Sumps 1, 2, & 3 pumped down (September 1); Sheen visible in B99/B100 sump & B107/B108 sump
9/9/2020	28	37	36	Not measurable	Sheen visible in B107/B108 sump
9/15/2020	1	35	33	Not measurable	
9/23/2020	0	0	0	Not measurable	
9/30/2020	1	10	9	Not measurable	
10/8/2020	4	12	11.5	Not measurable	
10/15/2020	0	11	10.5	Not measurable	Less than 0.1 gal of DNAPL recovered B107/B108 sump
10/21/2020	1	10.5	9.25	Not measurable	
10/28/2020	0	11	10	Not measurable	
11/4/2020	9	13	12	Not measurable	
11/11/2020	0.5	12	11	Not measurable	
11/18/2020	3.5	13	12	Not measurable	
11/24/2020	7	14	13.5	Not measurable	
11/30/2020	2	7	6	Not measurable	
12/10/2020	5	10.5	10	Not measurable	
12/18/2020	4	10	9	Not measurable	
12/23/2020	1	9	7.5	Not measurable	
12/31/2020	0	4	3.5	Not measurable	

Note:

Freeboard in sumps is measured as depth to water from top rim of sump, measured in inches

ATTACHMENT A

Weekly Inspection Photolog



PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 1	Date: 12/10/2020
Description: Frac tank for storage of pumped down water from NAPL Collection Sumps (in Slot B110), looking northwest. Lat: 29.7841028 Long: - 95.3209833	



Photo No. 2	Date: 12/10/2020
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Description: Slot A021, no tar-like material seeps observed where test pit (July 2020) conducted, looking south. Lat: 29.785392, Long: -95.318655	
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PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No.: 19119232
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Photo No. 3	Date: 12/10/2020
Description: Slot B057, no tar-like material seeps observed where test pit (July 2020) conducted, looking north. Lat: 29.7847472 Long: - 95.3195417	



Photo No. 4	Date: 12/10/2020
Description: Slot B101, no tar-like material seeps observed, looking north. Lat: 29.784275 Long: - 95.320813	





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No.: 19119232
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Photo No. 5	Date: 12/10/2020
Description: Slot B102, small amount of tar-like material seeping at asphalt joint, material was removed. Lat: 29.7842203 Long: - 95.320827	



Photo No. 6	Date: 12/10/2020
Description: Slot B105, no tar-like material seeps observed, looking north. Lat: 29.7841472 Long: - 95.3208777	





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No.: 19119232
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Photo No. 7	Date: 12/10/2020
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Description:

Slot B108, view of NAPL Collection System (Sump B107/B108 and test pit in background). No tar-like material seeps observed, looking north.

Lat: 29.784125
Long: - 95.320989



Photo No. 8	Date: 12/10/2020
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Description:

Sump 3 (B107/B108), 10 inches of freeboard in sump. No sheen, odor or tar-like material observed.

Lat: 29.7842861
Long: - 95.3208611





Client Name:
Union Pacific Railroad

Site Location:
Englewood Houston, Texas

Project No.
19119232

Photo No.
9

Date:
12/18/2020

Description:

Slot A022, no tar-like material seeps observed, looking south.

Lat: 29.785392,
Long: -95.318655



Photo No.
10

Date:
12/18/2020

Description:

Slot B013, no tar-like material seeps observed where test pit (July 2020) conducted, looking north.

Lat: 29.785217
Long: -95.318261





PHOTOGRAPHIC LOG

Client Name:
Union Pacific Railroad

Site Location:
Englewood Houston, Texas

Project No.
19119232

Photo No.
11

Date:
12/18/2020

Description:

Slot B096, no tar-like material seeps observed where test pit (July 2020) conducted, looking north.

Lat: 29.7842528
Long: - 95.3206250



Photo No.
12

Date:
12/18/2020

Description:

Slot B101, very small amount of tar-like material seeping at asphalt crack. Material was removed.

Lat: 29.784275
Long: - 95.320813





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 13	Date: 12/18/2020
Description: Slot B102, small amount of tar-like material seeping at asphalt joint, material was removed.	
Lat: 29.7842203 Long: - 95.320827	



Photo No. 14	Date: 12/18/2020
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Description: Slot B103, view of NAPL Collection System (Sump 103/104 on left). No tar-like material seeps observed, looking north.	
Lat: 29.7841639 Long: - 95.3208694	





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 15	Date: 12/18/2020
Description: Slot B105, no tar-like material seeps observed, looking north. Lat: 29.7841472 Long: - 95.3208777	



Photo No. 16	Date: 12/18/2020
Description: Slot B108, view of NAPL Collection System (Sump B107/B108 and test pit in background). No tar-like material seeps observed, looking north. Lat: 29.784125 Long: - 95.320989	





Client Name:
Union Pacific Railroad

Site Location:
Englewood Houston, Texas

Project No.
19119232

Photo No.
17

Date:
12/18/2020

Description:

Sump 1 (B099/B100), 4 inches of freeboard in sump, no sheen or odor noted.

Lat: 29.7844000
Long: - 95.3205861



Photo No.
18

Date:
12/18/2020

Description:

Sump 2 (B103/B104), 10 inches of freeboard in sump, no sheen or odors noted.

Lat: 29.7842861
Long: - 95.3208611





Client Name:
Union Pacific Railroad

Site Location:
Englewood Houston, Texas

Project No.
19119232

Photo No.
19

Date:
12/23/2020

Description:

Slot A010, no tar-like material seeps observed where test pit (July 2020) conducted, looking south.

Lat: 29.7855833,
Long: -95.318375



Photo No.
20

Date:
12/23/2020

Description:

Slot A021, no tar-like material seeps observed where test pit (July 2020) conducted, looking south.

Lat: 29.785392,
Long: -95.318655





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No.: 19119232
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Photo No. 21	Date: 12/23/2020
Description: Slot B013, no tar-like material seeps observed where test pit (July 2020) conducted, looking north. Lat: 29.785217 Long: - 95.318261	



Photo No. 22	Date: 12/23/2020
Description: Slot B057, no tar-like material seeps observed where test pit (July 2020) conducted, looking north. Lat: 29.7847472 Long: - 95.3195417	





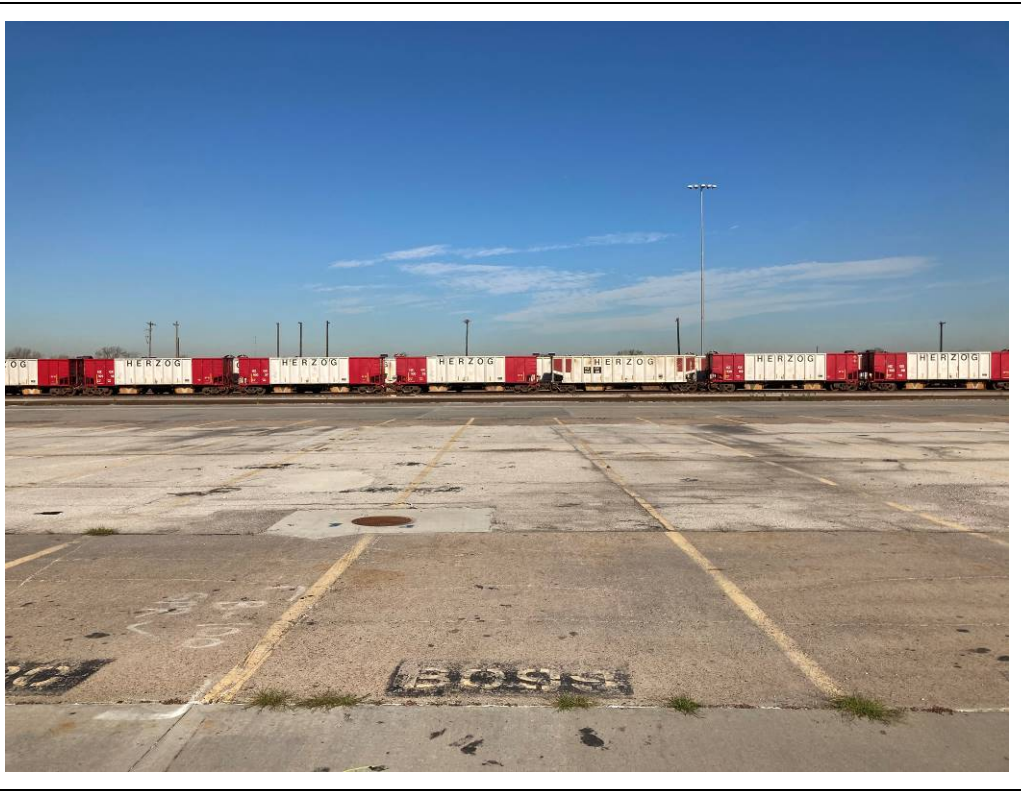
PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No.: 19119232
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Photo No.: 23	Date: 12/23/2020
Description: Slot B096, no tar-like material seeps observed where test pit (July 2020) conducted, looking north. Lat: 29.7842528 Long: - 95.3206250	



Photo No.: 24	Date: 12/30/2020
Description: Slot B099, view of NAPL Collection System (Sump 099/100 in background). No tar-like material seeps observed, looking north. Lat: 29.7842472 Long: - 95.3206944	





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 25	Date: 12/30/2020
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Description

Slot A017, localized staining observed on concrete, likely from hydraulic oil from maintenance activities on a container crane in September 2020, no standing water or tar-like material seeps observed, looking south.

Lat: 29.785417
Long: -95.318536



Photo No. 26	Date: 12/30/2020
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Description:

Slot A022, no tar-like material seeps observed, looking south.

Lat: 29.785392,
Long: -95.318655





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 27	Date: 12/30/2020
Description: Slot B101, no tar-like material seeps observed, looking north. Lat: 29.784275 Long: - 95.320813	



Photo No. 28	Date: 12/30/2020
Description: Slot B102, no tar-like material seeps observed, looking north. Lat: 29.7842203 Long: - 95.320827	





PHOTOGRAPHIC LOG

Client Name: Union Pacific Railroad	Site Location: Englewood Houston, Texas	Project No. 19119232
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Photo No. 29	Date: 12/30/2020
Description: Slot B105, small amount of tar-like material seeping at asphalt crack, material was removed, looking north. Lat: 29.7841472 Long: - 95.3208777	



Photo No. 30	Date: 12/30/2020
Description: Slots B109-B097, NAPL collection system visible in background, residual brown staining observed along the crack in the asphalt, looking northeast. Lat: 29.784116 Long: -95.321022	





PHOTOGRAPHIC LOG

Client Name:
Union Pacific Railroad

Site Location:
Englewood Houston, Texas

Project No.
19119232

Photo No.
31

Date:
12/30/2020

Description:

Slots C129-C131, vacuum boxes containing water from storm sewer cleanout, looking south.

Lat: 29.783922
Long: -95.321122



Photo No.
32

Date:
12/30/2020

Description:

Slot C130, 55-gallon drum containing stormwater booms from storm sewer cleanout.

Lat: 29.783922
Long: -95.321122



ATTACHMENT B

Waste Disposal Manifests

Please print or type.

USECO

UBP

NRC-4535

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TRD000820266/31547	2. Page 1 of 1	3. Emergency Response Phone 888-877-7267	4. Manifest Tracking Number 022128280 JJK						
5. Generator's Name and Mailing Address Union Pacific C/O GHD Service 6520 Corporate Dr. Indianapolis, IN 46278 Generator's Phone: 414-267-4164				Generator's Site Address (if different than mailing address) Union Pacific Railroad 4910 Liberty Rd Houston, TX 77026							
6. Transporter 1 Company Name NRC Environmental Services, Inc.					U.S. EPA ID Number FLK 0000 12823						
7. Transporter 2 Company Name					U.S. EPA ID Number						
8. Designated Facility Name and Site Address Waste Connections - Seabreeze Landfill 10310 Fm 523 Houston, TX 77516 Facility's Phone: 281-864-4442					U.S. EPA ID Number H1539						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
		1. Non-regulated material (Petroleum Impacted Water)		No.	Type	15	6	K18	1022		
		2.									
		3.									
		4.									
14. Special Handling Instructions and Additional Information WR# 003008 Pack # SB-20-712 Hut-911-1141											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name X Tommy Ray				Signature <i>Tommy Ray</i>		Month 11		Day 30		Year 20	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____											
17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name Marcus Johnson				Signature <i>Marcus Johnson</i>		Month 11		Day 30		Year 20	
Transporter 2 Printed/Typed Name				Signature		Month		Day		Year	
18. Discrepancy											
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____											
18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. HB2		2.		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name Isabel Jimenez				Signature <i>Isabel Jimenez</i>		Month 11		Day 30		Year 20	