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Our Ref. 11215702-Howard-13

November 9, 2021

Ms. Ashley Howard
1201 Elm Street, Suite 500
Dallas, Texas 75270

**Request for Northern Impoundment Schedule Extension - Addendum
San Jacinto Waste Pits Superfund Site
Channelview, Texas
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
Docket No. 06-02-18**

Dear Ms. Howard:

GHD Services Inc. (GHD), on behalf of International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC; collectively referred to as the Respondents), and in response to an October 28, 2021, e-mail request by the United States Environmental Protection Agency (EPA), submits this Addendum to the Request for Northern Impoundment Schedule Extension letter (October 2021 Extension Request) for the San Jacinto River Waste Pits Superfund Site, which was submitted to the EPA on October 1, 2021.

The October 2021 Extension Request provided a detailed explanation for the Respondents' request to extend the deadline for submittal of the *Pre-Final 90% Remedial Design - Northern Impoundment* (Northern Impoundment 90% RD) by 160 days to June 26, 2022. At the request of the EPA, it also included a schedule for the staged submittal of some of the supporting deliverables to be included in the Northern Impoundment 90% RD, as identified in the Statement of Work (SOW) attached to the Administrative Order on Consent for Remedial Design dated April 2018. As requested in EPA's October 28, 2021, e-mail, the Respondents are submitting a revised schedule for the submittal of all RD components required by the SOW to be included in the Northern Impoundment 90% RD. The deliverables, target submittal dates, and explanation for the target dates are included in the table below. The Respondents are proposing these target dates for the RD components to facilitate the EPA's review of the full Northern Impoundment 90% RD package, with the extended deadline for submitting the Northern Impoundment 90% RD package (June 26, 2022) being the enforceable deadline under the SOW.

The Respondents note that Section 3.6 of the SOW specifies that "the Pre-Final RDs will serve as the approved Final (100%) RDs if EPA approves the Pre-Final RDs without comments". This implies that the Northern Impoundment 90% RD package is to include documents that, if approved by EPA without comment, would become final and part of the Final (100%) Remedial Design - Northern Impoundment (Northern Impoundment 100% RD). By agreeing to submit portions of the Northern Impoundment 90% RD package prior to the entire Northern Impoundment 90% RD package being complete, the Respondents anticipate that some of these supporting deliverables may not be "final" and will require further updating. As such, the Respondents reserve the right to further revise or update these deliverables as needed, as the design progresses, with any EPA comments on these deliverables to be addressed in the Northern Impoundment 100% RD package.

RD Component	Target Submittal Date	Explanation if Target Date is Later Than January 2022
Health and Safety Plan (HASP) (Describes all activities to be performed to protect on-Site personnel and area residents from physical, chemical, and all other hazards posed by the Northern Impoundment Remedial Action (RA).	January 2022	
Emergency Response Plan (ERP) (Describes procedures to be used in the event of an accident or emergency at the Northern Impoundment).	January 2022	
Monitored Natural Recovery Plan (Operations & Maintenance [O&M] Plan) (Describes the plan to implement Monitored Natural Recovery in the Sand Separation Area, as specified in the Record of Decision [ROD]).	January 2022	
Transportation and Off-Site Disposal Plan (TODP) (Describes the procedures for on-Site management of excavated material to be disposed of off-Site, transportation routes for off-Site shipments, etc.).	January 2022	
Quality Assurance Project Plan (QAPP) (Augments the Field Sampling Plan and addresses sample analysis and data handling during the Northern Impoundment RA).	March 2022	The QAPP is intended to augment the Field Sampling Plan (FSP). Additional time is needed to better understand what will be included in the FSP.
Site-Wide Monitoring Plan (SWMP) (Describes procedures for ongoing monitoring necessary during the Northern Impoundment RA).	May 2022	Additional time is needed to better understand the excavation extent and sequencing and how that will affect stormwater controls, etc.
Field Sampling Plan (FSP) (Describes procedures for sample collection activities during the Northern Impoundment RA).	May 2022	Additional time is needed to better understand the excavation extent and sequencing and how that will inform the post-confirmation sampling procedures.
Construction Quality Assurance/Quality Control Plan (CQAQCP) (Describes the planned and systemic activities that verify the Northern Impoundment RA construction will satisfy all plan, specifications, and related requirements).	June 2022 with 90% RD	This plan cannot be finalized until the drawings and specifications are finalized (also in June 2022).
Operations and Maintenance Plan (O&M Plan) (Describes the requirements for inspecting, operating, and maintaining the Northern Impoundment RA, following completion of Northern Impoundment RA construction).	June 2022 with 90% RD	Further design work, not expected to be completed until second quarter 2022, needs to be completed to determine if this plan will be necessary.
O&M Manual (Serves as a guide to the purpose and function of the equipment and systems that make up the remedy).	June 2022 with 90% RD	Further design work, not expected to be completed until second quarter 2022, is needed to determine if an O&M Manual is necessary.
Institutional Controls Implementation and Assurance Plan (ICIAP) (Describes plans to implement, maintain, and enforce the ICs for the Northern Impoundment).	June 2022 with 90% RD	ICs will be dependent upon the final design.
Complete set of Construction Drawings and Specifications (Complete set of drawings and specifications that are certified by a registered engineer and suitable for procurement).	June 2022 with 90% RD	Additional time is needed to incorporate data from the Supplemental Design Investigation and to develop these drawings and specifications, as detailed in the October 2021 Extension Request Letter.
Design Criteria Report (As detailed in Sections 3.5 and 3.6 of the SOW).	June 2022 with 90% RD	This accompanies the aforementioned construction drawings and specifications and provides details on the basis of the design.

Notwithstanding the staged submittal of the RD components detailed above, it should be noted that the extension requested in the October 2021 Extension Request was based on the process described in the SOW, in which following submittal of the Northern Impoundment 30% RD, the next deliverable due to the EPA would be the Northern Impoundment 90% RD and as that deliverable was being developed, the Respondents would provide monthly reporting to EPA on their progress. In the October 2021 Extension Request, the Respondents

agreed to the EPA's request that they provide updated versions of select supporting plans earlier than the extended response date. The EPA also has been engaged in details of the ongoing design at a level that has required significant attention on the part of the design team and at times, has slowed down the pace and progress of the design work. Meeting a June 26, 2022, deadline for completing the Northern Impoundment 90% RD will require focus on the part of the Respondents' design engineer on developing the RD components at a 90% design level. Should the Respondents and their design engineer be unable to bring the necessary focus to the project, it may not be possible to meet that deadline and a further request for an extension may be required.

Additionally, the October 2021 Extension Request was based on information known at the time, and as has been recently discussed with EPA, the Respondents are learning more about the unique challenges presented by the Northwest corner of the Northern Impoundment and the potential need to evaluate an alternative remedial approach for that portion of the Northern Impoundment.

Should you have any questions regarding this submittal, please contact the undersigned at (225) 292-9007, Mr. Philip Slowiak of IP at (901) 419-3845, or Ms. Judy Armour of MIMC at (404) 915-8160.

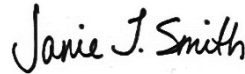
Regards,

GHD



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