

March 15, 2024

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Environmental Protection Agency, Region 6  
1201 Elm Street, Ste. 500  
Dallas, Texas 75270

**RE: Operational Consideration Area Work Plan, Areas 4C and 6B  
Larose Compressor Station, LA  
Texas Eastern Transmission, LP**

Dear Dale,

Pursuant to the 1989 Consent Decree and its subsequent modifications, Texas Eastern Transmission, LP (“Texas Eastern”) is submitting the enclosed Operational Consideration Area Work Plan (“OCAWP”) for two specific locations at the Larose Compressor Station in Lafourche Parish, Louisiana.

As detailed further in the OCAWP, Texas Eastern entered into the Consent Decree on October 11, 1989, and subsequently remediated certain areas containing polychlorinated biphenyls (“PCBs”) at the company’s natural gas compressor stations. The parties to the Consent Decree modified it in 1993 to, among other things, account for operational considerations that prevented remediation at certain operating facilities. This allowed for a variance in “operational consideration areas” (“OCAs”) where remediation was not technically practical or otherwise could not be completed while ensuring worker safety and protecting the integrity of pipeline equipment and facilities. The Consent Decree provides that when facilities are modified or permanently removed from service such that areas of un-remediated soil would become accessible, Texas Eastern would contact EPA to determine whether further remediation is required. Texas Eastern informed EPA in June, 2023 that it would undertake further remediation at Larose pursuant to the Consent Decree.

Previous site investigation at the Larose Compressor Station identified two areas of PCB-impacted soil that were not accessible for cleanup during the initial remediation and thus were classified as OCAs and managed for future remediation under the Consent Decree: Areas 4C and 6B, each as further defined in the OCAWP. Importantly, the Larose Compressor Station is part of Texas Eastern’s pipeline system that provides natural gas to the public, and it must be operated in accordance with its certificates of public convenience and necessity issued pursuant to the Natural Gas Act by the Federal Energy Regulatory Commission (“FERC”). Texas Eastern is undertaking additional activities at the Larose Compressor Station, including certain decommissioning work, that will allow Texas Eastern to access these OCAs and remove soils that may be PCB-impacted and that were not addressed during the initial remediation. The existing equipment at this site must be decommissioned and replaced, and the soil excavation and backfill activities completed, in a very narrow window of time in order for the pipeline system to be fully operational and support natural gas demand.

Texas Eastern presented information about this project to EPA personnel on September 1, 2023 and November 30, 2023, including specific plan and cross-section views of the soil not previously excavated at OCA Areas 4C and 6B. At that time, Texas Eastern informed EPA that project construction activities would commence in February 2024. Subsequent to that initial meeting, however, EPA requested additional information and analysis regarding whether and how the Consent Decree requirements apply to the site. Texas Eastern provided the requested information, including participating in a conference call with counsel on January 22, 2024. During these conversations with EPA, Texas Eastern clearly communicated the project

timeline and schedule constraints. In response, EPA assured Texas Eastern that the review and approval process would be seamless and not impede the project schedule. However, EPA has not yet provided clarification on the applicability of Consent Decree cleanup criteria for the OCAs despite numerous communications with Region 6 and headquarters regarding the urgency for resolution. Texas Eastern is unable to continue to delay finalizing its workplan for addressing the two OCAs. Texas Eastern acknowledges that remediation of the OCAs is necessary and as such, Texas Eastern prepared the OCAWP to include the conservative measures of over-excavating the OCA areas into adjacent clean fill areas, as appropriate, collect confirmatory samples for analysis and backfilling with clean soil. In order to remain compliant with its obligations to FERC and its gas supply outage date commitments, remedial work on the first OCA, in addition to other planned construction activities, will occur March 22-30, 2024. These outage dates have been coordinated with multiple stakeholders and are not flexible, therefore the OCA remediation for area 6B must be completed within this timeframe. Remedial work on the second OCA (4C) is scheduled for the third quarter of 2024. Texas Eastern will provide further notification to EPA once the schedule for remedial work on the second OCA is more firm.

Thank you for your consideration of this matter. If you have any questions, you may contact Niti Tottempudi (at 832-370-5069 or [niti.tottempudi@enbridge.com](mailto:niti.tottempudi@enbridge.com)) or me via e-mail or telephone.

Sincerely,



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cc: Harry Shah, EPA Region 6 Section Chief

# **Operational Consideration Area Work Plan**

## **Larose Compressor Station Louisiana**

**Prepared By:  
Texas Eastern Transmission, LP  
Houston, Texas**

**March 2024**

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## **Section 1**

### **Introduction and Scope of Work**

Texas Eastern Transmission, LP (Texas Eastern), an Enbridge company, owns and operates a natural gas transmission pipeline that extends from the Gulf of Mexico to the State of New York. The Texas Eastern pipeline uses several types of natural gas compressors to convey natural gas through the pipeline system. One of the types of natural gas compressors, the turbine-driven centrifugal compressor, used a lubricant that contained polychlorinated biphenyls (PCBs) because of their fire-retardant properties. The lubricant, used from 1958 through 1977, was introduced into the pipeline system from operations of the turbine-driven centrifugal compressors.

On October 11, 1989, the United States District Court for the Southern District of Texas, Houston Division, approved the terms of a Consent Decree between Texas Eastern Transmission Corporation, d/b/a Texas Eastern Gas Pipeline Company (Texas Eastern), and the United States Environmental Protection Agency (EPA). There have subsequently been two modifications to the Federal Consent Decree:

- First Modification of the Consent Decree approved by the Court on December 2, 1993.
- Second Modification of the Consent Decree approved by the Court on August 23, 1994.

The Consent Decree (which in this document shall mean the Consent Decree, including the First and Second Modifications, and modifications to Appendices B and B-1) required Texas Eastern, among other things, to conduct site characterization and remediation at certain compressor stations along the Texas Eastern interstate gas pipeline system.

In 1991, Texas Eastern began site investigation and characterization activities to evaluate the presence of PCBs in soils, sediments, drainage ditch soils, and on equipment surfaces at the Larose Compressor Station. Between July 1992 through March 1993, Texas Eastern initiated remedial activities at the Larose Compressor Station in accordance with an EPA approved Site Remediation Work Plan (SRWP) and consistent with the requirements of the Consent Decree.

The Consent Decree PCB cleanup criteria was not achieved in all areas at the Larose Compressor Station because certain operational considerations prevented access to affected soil, or excavation posed safety and structural concerns. These areas are defined as Operational Consideration Areas (OCA). Texas Eastern developed long-term procedures to ensure that OCAs are reviewed and acted upon in compliance with the CD when planning operations and maintenance jobs and/or construction projects. These OCAs are generally described as certain areas containing PCB

impacted soils that were determined to be infeasible to remediate under the CD but left for remediation until a time when the site conditions were such that the safety and structural concerns were no longer an issue.

Based on previous site investigation work under the Consent Decree and CD, two OCA areas were identified. Decommissioning activities planned at the Larose Compressor Station for 2024 will allow access to affected OCAs in Area 4C and Area 6B. Texas Eastern developed this Operational Consideration Area Work Plan (OCAWP) that governs the removal of PCB impacted soils in Areas 4C and 6B, where the CD's PCB Cleanup Criteria was not achieved because of operational considerations. The OCAs consists of soils adjacent to the Hoist and Fin Fan Area (Area 4C) and Launcher Area (Area 6B). The **Scope of Work** for this project will entail the removal of PCB impacted soil not accessible during previous remediation efforts at Areas 4C and 6B OCAs. The intent of the remediation is to remove soils from the Area 4C and 6B OCAs that will now be accessible and are above the onsite Cleanup Criterion set forth in the Consent Decree, therefore eliminating the need to maintain these OCAs.

The Larose Compressor Station is part of Texas Eastern's pipeline system that provides natural gas to the public. It is, therefore, important that such service not be interrupted and that Texas Eastern continue to operate its pipeline system in accordance with certificates of public convenience and necessity issued pursuant to the Natural Gas Act by the Federal Energy Regulatory Commission (FERC). Accordingly, time is of the essence to complete remediation activities so that the newly installed piping and compression equipment can be fully operational to support natural gas demand. The current plan is to begin soil remediation in the 6B OCA in late March 2024 and complete the work very quickly to stay within gas supply outage date commitments. Remediation of area 4C will be completed later this year in the 3<sup>rd</sup> quarter.

It is anticipated that the remediation will follow a three-step process 1) over-excavation of the entire OCA soil area, 2: collection of samples for fast turnaround analysis/verify Cleanup Criteria was achieved and 3) release of the construction team to continue with installation of gas equipment. This analytical data will be reported to the agency to support the conclusion that Area 6B and 4C has been remediated pursuant to the Consent Decree.

Soils removed from OCA excavations with PCB concentrations above the cleanup standard will be transported by a licensed and qualified waste transportation firm and delivered for disposal to a waste facility approved to accept and manage PCB remediation waste.

## **1.1 Organization and Responsibilities**

Texas Eastern has the overall responsibility for remedial activities conducted at the Larose Compressor Station. These responsibilities include project direction, decisions concerning technical issues and basic program policies. Texas Eastern personnel or their representatives will serve as the interface with the EPA.

A Remediation Contractor will be retained by Texas Eastern for the Larose Compressor Station remediation work. Texas Eastern may employ other contractors to provide transportation and disposal services for the excavated soils, site surveying, laboratory services, sampling and analysis and remediation supervision. Surveying will be conducted by or under the authority of a registered professional land surveyor. Texas Eastern safety and construction representatives will be on the site during the remediation work.

## **1.2 Revisions to the Operational Consideration Area Work Plan**

Modifications or revisions to this Work Plan may be required due to site conditions, unforeseen circumstances, or operating conditions. Revisions or modifications will be made as field revisions. The format to be used for recording, filing and documenting EPA approval of field revisions will be the Field Revision Log, which is included in Appendix B of this OCAWP. All field revisions require EPA approval and must be approved by the EPA Project Contact within three days. EPA will review field revisions and notify Texas Eastern of its decision.

## **Section 2**

### **Background**

The Larose Compressor Station site is in Lafourche Parish, Louisiana, approximately 1.5 miles northeast of Larose on Route 657 (Figure 1). The site occupies approximately 40 acres in a rural area with marshland surrounding the station. The site elevation ranges from about 6 feet above mean sea level (AMSL) at the intermediate levee of the holding lagoon to about 4 feet below mean sea level (BMSL) in the perimeter drainage ditch. The majority of the site is less than two feet AMSL. The topography of the site is essentially flat with man-made embankments. The site is surrounded by a levee to protect it from flooding.

#### **2.1 Surface Features and Drainage**

The Larose Compressor Station is fenced and is in a coastal marsh area with very little relief. Most of the surface features at the site are located at or below mean sea level. The site is entirely within the 100-year flood plain. The station is surrounded by a system of manmade levees, approximately 5 to 6 feet in height, and drainage ditches to prevent flooding. An intermediate north-south levee separates the active areas of the facility from a large (approximately eight acre) drainage holding lagoon on the eastern edge of the property.

Most surface runoff from the site drains into a well-defined drainage ditch which is situated on three sides of the site adjacent to the levee. This ditch, which is identified as Drainage Ditch A, receives runoff from three smaller ditches – Drainage Ditch C, Drainage Ditch D, and Drainage Ditch E. Drainage Ditch C begins near the location of the former oil/water separator and flows westward into Drainage Ditch A on the west side of the site. Drainage Ditch D flows southward from the middle of the site into Drainage Ditch C about 200 feet east of the intersection of Drainage Ditch C with Drainage Ditch A. Drainage Ditch E drains the east side of the site and drains into Drainage Ditch A immediately west of the intermediate levee. The water is then pumped from the drainage collection ditch and discharged over the intermediate levee into the lagoon.

#### **2.2 Site Geology**

The Larose Compressor Station is in east-central Lafourche Parish, which is within the Mississippi River Alluvial Section of the Coastal Plain physiographic province. Structurally, the station area is located above the axis of the Gulf Coast Geosyncline, that strikes east-west and is made up of over 30,000 feet of unconsolidated sediment (Russell, 1936). Directly underlying the site are Fresh

marsh Quaternary Delta Plain deposits (Kolb, 1958), made up of organic clay sediments, peats and organic oozes mixed with inorganic clays and silts. This type of marsh deposit occurs as a band along the landward border of a marsh or in areas subject to repeated inundation by freshwater. These sediments are underlain by sediments of Miocene and older age. The entire sequence of sediments is composed of unconsolidated, interbedded sands, silts, clays and gravels, which are generally lenticular, heterogenous and dip southward to the coast (Russell, 1936).

The near-surface sediments (upper 25 feet) are described as clays and silty clays with silt pockets, sand lenses and organics. An approximate 3-foot thick silty sand layer was present in some of the deeper borings. Where present, the top of this sand was found at depths ranging from 12 to 18 feet below land surface. However, this sand unit appears to be absent in some areas of the facility. Deeper borings do not indicate a permeable zone below the upper 25 feet. The soils are described as clay with natural organic material and intermittent silt and sand pockets and partings.

## **2.3 Site Hydrogeology**

Groundwater is not a significant resource in the Larose area due to high salinity. As a result, Lafourche Parish does not use any groundwater for public supplies. The upper clay and silty clay unit contains silt and sand lenses and pockets. This unit is described as saturated. The water table was encountered in each Woodward-Clyde boring in the upper 10 feet. In some cases, the water-table level has been within 0.5 feet of the ground surface. Significant factors that affect the groundwater flow regime of the Larose site are summarized as follows:

- Horizontal groundwater flow in the upper saturated zone is controlled by the water level in the perimeter ditch, which is lower than the groundwater levels in the onsite monitoring wells and piezometers.
- The surrounding water bodies have water elevations that are higher than the ground surface at the facility, thus negating the potential for lateral migration in the upper saturated zone beyond the limits of the facility.
- The existing data indicate there is a consistent upward gradient from the sand unit at about 15 feet below land surface to the upper saturated unit at about 10 feet below land surface, thus there is no potential for downward contaminant migration of dissolved solutes in groundwater.

Considering these factors, hydraulic heads in the underlying sand unit are controlled to some extent by the water levels in the surrounding water bodies. Hydraulic heads in the upper saturated zone are controlled by pumping of the perimeter ditch. This accounts for the upward flow from the sand unit to the upper saturated zone. With these flow patterns, the upper saturated zone is recharged by surface infiltration, and also by upward flow from the underlying sand.

## **2.4 Site Characterization**

PCB impacts at the Larose Compressor Station were delineated through a series of characterization efforts. The results of previous site investigation, characterization and remediation programs completed at the Larose Compressor Station were submitted in the following reports:

- Groundwater Assessment Plan, Larose, Louisiana (Woodward-Clyde Consultants, June 1991).
- Site Characterization Report, Larose, Louisiana (Woodward-Clyde Consultants, September 1991).
- Site Remediation Work Plan, Larose, Louisiana (Woodward-Clyde Consultants, July 1992).

## **2.5 Site Remediation**

From July 1992 through March 1993, Texas Eastern conducted remediation activities at the Larose Compressor Station. Key information related to remedial actions was presented in the "Site Verification Report, Texas Eastern Compressor Station, Larose, Louisiana," June 1993, by Woodward Clyde Consultants (hereafter SVR).

Two OCAs remained active after completion of remediation efforts. OCAs in Areas 4C and 6B are located adjacent to the Hoist and Fin Fan Area (Area 4C) and Launcher Area (Area 6B).

Remediation in OCA 6B will take place in March/April, 2024 and OCA 4C remediation will occur in the 3<sup>rd</sup> quarter of 2024. Texas Eastern will notify EPA when the remediation schedule for OCA 4C is more firm.

## **Section 3**

### **Remediation Strategy**

Based on the criteria established in Section V.H.3 of Appendix A of the Consent Decree, cleanup levels and strategies were established for soils in areas identified as requiring remediation. The Consent Decree's Cleanup Criteria of 25 ppm for PCB concentrations in onsite soils is provided in section V.H.3 of Appendix A.

Decommissioning activities planned at the Larose Compressor Station will allow access to Areas 4C and 6B (Figures 2 and 3, respectively). This OCAWP was developed to remove PCBs in Areas 4C and 6B OCAs. A depiction and dimensions of the OCAs in Areas 4C and 6B are provided in Figures 2 and 3, respectively.

#### **3.1 Cleanup Criteria**

The objective of remedial activities proposed for the Larose Compressor Station is to achieve the PCB Cleanup Criteria as stated in the Consent Decree. Therefore, the Cleanup Criteria for soil remediation completed under this OCAWP will be 25 ppm. Texas Eastern plans to meet this criterion by excavating the soils within these OCAs (Areas 4C and 6B) unless excavation encounters a limiting condition of excavation as discussed in Section 4.4 below.

#### **3.2 Excavation Delineation and Soil Removal**

OCA impacts exist immediately adjacent to areas that were remediated by excavation and removal between July 1992 through March 1993. The soil removal approach entails excavation and removal of the soil including removal of concrete supports where needed in two separate areas, Areas 4C and 6B.

In Area 4C, previous remediation was conducted to 3.5 ft. below ground surface. Consequently, remediation via excavation in the Fin Fan Area of 4C will consist of a 25 ft. long by 2.5 ft. wide excavation, down to approximately 5 ft. deep, which will likely be a foot or more below the water table. The water table may present a limiting condition for remediation in this area.

In Area 6 B, previous remediation was conducted to between 2 and 4 ft. below ground surface but was halted due to concern for the integrity of the adjacent equipment. However, stabilizing bench soil was left around the entire concrete support blocks of the pig receiver. Approximately 7.2 cubic yards of soil was not excavated beneath and around the concrete support blocks to provide the stabilizing bench, which was necessary to prevent loss of stability to the pig receiver and launcher.

Consequently, the excavation will consist of two areas of excavation corresponding to each of the two concrete support blocks. One area is approximately 8 ft. long by 3 ft. wide, down to approximately 5.5 ft. deep. The second area is approximately 8 ft. long by 5 ft. wide, down to approximately 5.5 ft. deep. Both excavations will include the removal of concrete support blocks.

Prior to backfilling the OCA area, remediation verification samples will be collected to confirm applicable remediation goals have been met. Verification samples shall be collected in each 25 ft. by 25 ft. remediated grid square. The location of each sample shall be determined by dividing grid squares into four grid quadrants. For purposes of this Section, a grid quadrant shall be defined as a 12.5 ft. by 12.5 ft. surface area or any fractional portion of such a surface area that exceeds 75 sq. ft. Where fractional grid quadrants are present which are less than or equal to 75 sq. ft. each fractional grid quadrant area shall be considered as an extension of its adjacent whole grid quadrant. Two verification samples, uniformly spaced, shall be taken in each grid quadrant as shown in the conceptual sample location diagram and measurements in Figure 4.

The remediation process for OCA 6B and 4C will follow these steps. If visible impacts, such as oily residue or staining are present after an excavation lift, verification samples will not be collected, and an additional lift will be excavated. If no visible impacts are present after an excavation lift, two verification samples will be collected. Verification samples will be analyzed with an expedited turnaround time (TAT) and the excavation will remain open pending review of the analytical results. If both verification samples taken from a remediated grid quadrant contain PCB concentrations less than or equal to the applicable Cleanup Criteria (25 ppm), then no further excavation or sampling shall be required in that grid quadrant and any associated fractional grid quadrant area. If either verification sample taken from any grid quadrant contains PCB concentrations greater than the applicable Cleanup Criteria, excavation shall continue by removing a layer of soil from the entire grid quadrant and any associated fractional grid quadrant area and another set of verification samples in each of the approximate locations of the previous verification samples shall be taken.

Excavation and verification sampling shall continue in each grid quadrant and associated fractional grid quadrant area until the applicable Cleanup Criteria has been achieved. Once the remediation of the OCA has been verified, results will be provided to EPA for review and approval. Upon their approval, backfilling may begin.

The depth of excavation will be reasonably uniform within each grid square. Unless otherwise noted, the initial minimum planned excavation depth will be approximately 5 ft. (Area 4C) and

5.5 ft. (Area 6B), and the minimum subsequent excavation depth will be 12 inches unless an excavation limitation discussed in Section 4.4 is encountered. Sidewall samples are not proposed to be collected in Area 6B because the surrounding areas were backfilled with clean fill at the time of remediation. Sidewall samples maybe collected if the excavation in area 4C exceeds a depth of 7 ft. below grade. Excavation and verification sampling will continue until the Cleanup Criteria has been achieved.

### **3.3 Removal Volume Summary for Soils**

The estimated removal volumes\* in the OCAs for Area 4C and 6B are:

| <b>Location</b>   | <b>Area<br/>(ft<sup>2</sup>)</b> | <b>Volume<br/>(yd<sup>3</sup>)</b> |
|---|----------------------------------|------------------------------------|
| Area 4C: 25' (L) x 2.5' (W) x 5' (D)                            | 62.5                             | 3.5                                |
| Area 6B: 8' (L) x 3' (W) x 4.5' (D); 8' (L) x 5' (W) x 4.5' (D) | 64                               | 7.2                                |
| <b>TOTAL</b>  | <b>126.5</b>                     | <b>10.7</b>                        |

\* Volumes include concrete and soil

## **Section 4**

### **Remedial Activities**

Soils at the Larose Compressor Station containing PCB concentrations greater than 25 ppm in the affected OCAs are to be remediated through excavation and removal. All excavated material will be managed according to the guidelines indicated below.

#### **4.1 Sampling Approach for Soils**

Verification Sampling will be conducted during site remediation activities. After site remediation areas have been excavated, verification samples will be collected to verify if the appropriate PCB Cleanup Criteria have been achieved.

Methods and equipment for sample collection are described in Section 3.3 of the Environmental Quality Assurance Management Plan (QAMP –Appendix B of this OCAWP). The QAMP includes specific Quality Assurance (QA) and Quality Control (QC) measures associated with environmental activities.

Pertinent activities conducted as part of the site remediation will be documented in field logs, including information pertinent to the field sampling program and the equipment preparation efforts. Field logbooks shall be used, and entries will be in ink. Any information entered into a database will be printed and stored.

The following information will be included in field logs or in a database for sampling activities:

- Location of site.
- Date(s) of sample collection.
- Time(s) of sample collection.
- Type(s) of samples collected and sample identification numbers.
- Number of samples collected.
- Description of sampling methodology (Section 3 of the QAMP).
- Field observations.
- Summary of equipment preparation procedures.
- Name and affiliation of sampling team leader; and
- Cross-reference of sample identification numbers to grid sample points (shown on annotated maps).

In addition, field logs will include the details of remedial activities, such as locations and volumes removed, excavation methods and records of field decisions. A photographic record of site remediation field activities will also be maintained by the Texas Eastern Representative.

A chain-of-custody form will be completed to document and ensure proper sample shipment

procedures. This form will include:

- Project site.
- Name of sample collector.
- Sample identification numbers.
- Sample type and description (surface soils, soil boring, equipment wipe, water).
- Analyses requested; and
- Special handling and storage requirements.

One copy of the form will accompany the sample to the laboratory, while a second will be maintained by the Texas Eastern Representative within onsite records.

## **4.2 Decontamination of Remediation and Sampling Equipment**

To the extent practical, dedicated disposable materials will be used for sample collection.

Decontamination of non-disposable/common sampling equipment used at the Larose Compressor Station will be decontaminated following standard Enbridge Standard Operating Procedures (SOPs), as applicable, including UST-7-B-1 (PCB Decontamination Methods) and UST-7-B-5 (PCB Decontamination of Equipment-Tools). Per the instructions in UST-7-B-1, the following will be performed prior to decontamination:

1. Remove any debris from the surface.
2. Wipe all liquids from surface.
3. Disassemble equipment, if necessary, to access and clean internal surfaces.
4. Contact Regional Environmental to discuss a problem, expedited sample analysis, or for other assistance, if required; and
5. Contact the Lab Services team to order a sample kit.

There are multiple decontamination methods that are acceptable for use, depending on what operations are being performed, what equipment is being decontaminated, etc. The decontamination methods are described as follows:

1. Decontamination of equipment in gas service or in contact with liquids containing PCBs:
  - a. Routine decontamination.
  - b. Triple rinse decontamination (for containers).
  - c. Emergency decontamination; and
2. Residual PCB decontamination (of equipment in contact with soil and/or groundwater with residual PCBs).

Since the most likely type of decontamination for the OCA remediation will be residual PCB decontamination, that method is detailed below. If one of the other decontamination methods is deemed applicable, refer to UST-7-B-1 for additional information.

Residual PCB decontamination should be performed using the following procedure:

1. Removed any debris from surface.
2. Pressure wash or scrub with stiff brushes using a phosphorus-free soap (e.g., Alconox™) and potable water.
3. Rinse with potable water; and
4. Air dry.

If hydrocarbon staining is observed:

1. Scrub all surfaces vigorously for one minute for each square foot of surface using organic solvent (isopropyl alcohol, hexane, or diesel) saturated rags, paper towels, or absorbent pads on smooth surfaces and brushes or scrubbing pads on rough surfaces, adding organic solvent as necessary to keep surface wet.
  - a. Use isopropyl alcohol only for small environmental sampling equipment.
2. Wipe the organic solvent from the surface; and
3. Allow surfaces that cannot be wiped to air dry, when practical.

Equipment that does not come into contact with materials containing PCBs (i.e., is placed on a heavy plastic liner or equivalent) will not require decontamination. If only the bucket of the excavation equipment comes in contact with materials containing PCBs, the bucket will be cleaned of gross amounts of materials containing PCBs, wrapped with plastic, and the excavation equipment moved to another area on the Larose Compressor Station for decontamination. The bucket will be decontaminated before use with materials or in area not containing PCBs and prior to demobilization from the Larose Compressor Station. A decontamination area will be established at the Larose Compressor Station by the Remediation Contractor, as required. This area will be designated as a contamination reduction zone for heavy equipment and will be large enough to accept heavy equipment.

Used decontamination water will be transferred to a holding tank or drums and will be sampled and analyzed for the presence of PCBs. Decontamination water may also be treated and discharged onsite, applied to excavated soil containing PCBs for dust control purposes, or shipped to an approved off-site disposal facility. Solvents such as hexane, hexane/kerosene, or other cleaning agents that are used in decontamination procedures will be collected separately, stored in drums, then treated and disposed of at an approved off-site disposal facility.

Following the completion of all remedial activities at the Larose Compressor Station, all worksite equipment will undergo final decontamination. Wipe samples will be collected following SOP 8-G after final decontamination of worksite equipment to ensure that adequate decontamination has been completed prior to demobilization. Worksite equipment will be released from the Larose Compressor Station when wipe sampling indicates that the established PCB cleanup level of 10 µg per 100 cm<sup>2</sup> has been achieved.

## **4.3 Limiting Conditions for Remediation**

The general limits of excavation for soils are defined in Section V.H.1 of Appendix A of the Consent Decree as any of the following:

- Bedrock which cannot be readily penetrated by a conventional backhoe bucket.
- Groundwater which makes further excavation impracticable; or
- A depth of 25 feet below grade.

### **4.3.1 Groundwater**

If groundwater is encountered as a limiting condition Texas Eastern will collect a sample from the excavation for PCB analysis. In order to obtain results representative of groundwater conditions the sample may be field and/or laboratory filtered prior to analysis. Groundwater is expected to be encountered at Area 4C at less than 5 ft. below grade.

## **4.4 Backfill Protocols for Excavations**

Excavations performed for the purposes of this OCAWP will be backfilled using clean fill. In compliance with the defined terms in Appendix A of the Consent Decree, the PCB concentration of backfill material will be verified by sampling and analysis prior to its use onsite. All off-site backfill sources shall be identified in the OCA Verification Report. If the backfill material is staged onsite, erosion of the stockpiled material will be controlled in accordance with Section 4.8.

In compliance with the defined terms in Appendix A of the Consent Decree, the PCB concentration of backfill material will be verified by sampling and analysis prior to its use. In addition to PCBs, backfill material will be sampled for benzene, toluene, ethylbenzene and xylenes (BTEX) and semi-volatile organic compounds (SVOC). Samples will be collected at a frequency of one sample per 25 cubic yards.

Backfilling will commence for portions of excavations verified to have achieved the established cleanup levels before excavation of other portions has been completed. As specified above, the backfill material will be from an off-site source area and will be tested and verified to be clean prior to emplacement.

Construction equipment used to excavate and handle backfill material will be kept clean and uncontaminated. The buckets or container devices will be decontaminated in accordance with Section 4.3, as conditions dictate prior to backfilling operations.

## **4.5 Material Handling and Disposal**

Excavated materials will be loaded into transfer boxes, front-end loader, dump truck, or other equivalent conveyance equipment and transferred to the soil staging area. Alternately, as site conditions warrant, material may be directly loaded onto highway transport trucks at each excavation area in lieu of staging.

Texas Eastern may use staging or temporary storage areas for soils or materials prior to disposal. Staging areas consisting of temporary paving or impermeable liners will be set up for this purpose. The onsite staging area will consist of a soil staging/stockpile area(s), and a truck tarping area, and may include truck weighing scales. Soils may be staged in lined and bermed stockpiles, roll off boxes, intermodal boxes, or by other equivalent containers. Erosion of stockpiled excavated material and transportation of soil or sediment resulting from erosion will be controlled with best management practices (BMP's).

Transportation trucks will be loaded in a "clean" area adjacent to the staging/stockpile area. Heavy plastic liner or equivalent barrier materials will be used under the truck staging area. If the trucks are operated within the bermed stockpile area and cannot be isolated from materials containing PCBs, the trucks will be decontaminated prior to exiting the bermed area.

Excavated material from OCAs will be disposed of within Toxic Substances Control Act (TSCA) - permitted landfills. Excavated material will be transported by an EPA and state approved and permitted waste transporter in lined trucks, intermodal boxes, roll off boxes, or equivalent, and covered with plastic tarps prior to leaving the Larose Compressor Station. Vehicles will be inspected prior to leaving the Larose Compressor Station, and the vehicle operator will be provided with a signed waste manifest. This waste manifest will accompany the vehicle to the waste disposal facility where the vehicle will be inspected again, along with the manifest signed by a representative of the facility. This manifest will be returned to a Texas Eastern environmental representative and retained to show proper disposal of excavated materials.

## **Section 5**

### **Site Control**

To maintain effective control over remediation operations, and to minimize the potential for exposure to personnel and the environment, Texas Eastern will implement a site control program that will include:

- The establishment of access control zones around each area being remediated from the initiation to the completion of remediation activities within that area.
- Health and Safety Procedures.
- The use of specific decontamination procedures for remediation and sampling equipment; and
- Traffic controls.

The aspects of each major portion of site control are discussed in the following sections. Field adjustment of site control procedures may be required to respond to changing or unanticipated field conditions. This adjustment shall include, when appropriate, the approval of the Site Health and Safety Officer or designee.

#### **5.1 Configuration of Exclusion, Contamination Reduction, and Support Zones**

Access restriction zones will be established surrounding each area where the potential exists for personnel and equipment coming into contact with contaminated material. The purpose of the zones is to restrict the potential spread of contaminated material and to minimize the potential for exposure to unprotected personnel by controlling the movement of personnel, equipment, and materials into and out of areas which are potentially contaminated. These areas include those within which the following activities will be performed:

- Soil excavation.
- Stockpiling.
- Loading.
- Remediation equipment surface decontamination; and
- Sampling.

The following access restriction zones will be developed around each such area:

- Exclusion Zone - The highest level of access control will be the exclusion zone, which will be delineated by a physical barrier. The barrier will be constructed of demarcation tape, rope or other suitable materials erected to delineate the zone. Access to the exclusion zone will be permitted for approved personnel only; these personnel will be required to wear appropriate personal protective equipment, as defined by the Site Health and Safety Officer or his designee. Access for personnel and equipment will be

through a specified access control point, which will be equipped with a reduction corridor in which an initial equipment decontamination shall occur.

- Contamination Reduction Zone - Activities within the contamination reduction zone will include personnel and equipment that require decontamination. The Contamination Reduction Zone may surround one or more Exclusion Zones, depending on the physical location of these zones. The Contamination Reduction Zones will be delineated with a physical barrier constructed of demarcation tape, rope or other suitable materials erected to delineate the zone. As with the Exclusion Zone, access to the Contamination Reduction Zone will be through an access control point, and appropriate personal protective equipment will be required for all personnel entering the zone, as defined by the Site Health and Safety Officer or his designee.
- Support Zone - Activities within the support zone, at a minimum, will include Larose Site management. Access to the reduction zones will be controlled through the support zone.

The configuration of these zones may be modified by the Texas Eastern Representative in response to changing or unanticipated field conditions.

## **5.2 Health and Safety Plan Guidelines**

After the contract is awarded, the Remediation Contractor will prepare a Health and Safety Plan for remedial activities. The Health and Safety Plan will be available at the Larose Compressor Station throughout the duration of the work. The Health and Safety Plan must be prepared in accordance with the most recent Occupational Safety and Health Administration (OSHA), EPA, and National Institute for Occupational Safety and Health (NIOSH) regulations and guidelines. Specifically, the following reference sources will be consulted:

- OSHA 29CFR1910.
- U.S. EPA/Environmental Response Team (ERT) Operating Guidelines.
- OSHA/NIOSH/EPA/United States Coast Guard "Occupational Health and Safety Guidelines for Activities at Hazardous Waste Sites".
- NIOSH Pocket Guide to Chemical Hazards; and
- American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values.

At a minimum, the Remediation Contractor's Health and Safety Plan must provide information concerning:

- Health and Safety Responsibility - The plan will outline the chain of command for implementing safe operating practices and the responsibilities of personnel designated in the chain of command.

- Subcontractors - At a minimum, subcontractors will be required to adhere to the Remediation Contractor's Health and Safety Plan in addition to their own plan.
- Anticipated Hazards - Potential chemical and physical hazards from Larose Compressor Station activities will be discussed. Special emphasis will be placed on daily safety meetings and job hazard analysis which will emphasize all potential site hazards, especially those associated with working around heavy equipment.
- Safety and Emergency Procedures - The safety and emergency procedures related to specific compressor station and site remediation operations will be discussed.
- Personal Protection Measures.
- Health and safety training for employees, refresher training, and Site Health and Safety Officer training. Training will include but not be limited to the following topics:
  - Action levels.
  - Levels of protection.
  - Work activities and primary levels of protection.
  - Task-specific health and safety procedures relating to soil sampling, excavations, and heavy equipment operation.
  - Work zones.
  - Equipment decontamination procedures.
  - Emergency procedures and emergency notifications; and
  - General safety guidelines.
- Heat and cold stress.
- Air sampling protocol.
- Safety Data Sheets (SDS).
- Job posters.
- Field operating procedures.
- Daily safety meetings.
- COVID 19 Site Protocols

### **5.3 Traffic Controls**

Due to the location of the Larose Compressor Station, the arrival and departure of transportation trucks and other large equipment may pose a hazard to traffic on the public road that leads to the site (State Road 657). To minimize the potential for accidents between non-station traffic on this road and large equipment entering or exiting the Larose Compressor Station, traffic control

measures will be utilized. These measures may include the placement of warning signs on this road as it approaches the Larose Compressor Station, and the use of spotters.

## **Section 6**

### **Sample Analysis**

During remediation at the Larose Compressor Station, the following sample types may be collected and analyzed for PCBs:

- Soil samples (verification).
- Backfill material samples.
- Wipe samples from excavation equipment for verification of decontamination.
- Pre-treated and post-treated open excavation, groundwater and equipment decontamination water samples; and
- Destructive samples from equipment foundations (pre-remediation or verification).

The analytical methods and quality control requirements for these analyses are described in the following sections.

#### **6.1 Soil Sample Analysis for PCBs**

Soil samples will be analyzed on an expedited TAT for PCBs in accordance with the specifications of Consent Decree Appendix B (PCB Sampling Techniques and Analytical Methods for Site Characterization and Cleanup Verification) Section V (PCB Analytical Techniques). The laboratory will conduct the analysis to achieve a nominal reporting limit of 1 ppm for soil's detection levels. Field samples will be submitted to the laboratory in batches of twenty samples or less. Quality control samples will be collected and analyzed in accordance with the objectives outlined in Section 9.2 of the QAMP.

Precision will be established from laboratory control samples (LCS) as outlined in the QAMP.

#### **6.2 Water Sample Analysis for PCBs**

Water samples will be analyzed for PCBs using Method 8082. The laboratory will conduct the analysis to achieve the reporting limits listed in Appendix 3 of the QAMP (Appendix B of this OCAWP). Samples will be submitted to the laboratory in batches of twenty samples or less. Quality control samples will be collected and analyzed in accordance with the objectives outlined in the QAMP.

### **6.3 Water Sample Analysis for Other Constituents**

Accumulated water will be pumped into and treated by an onsite water treatment system. Treated water will be discharged within designated water discharge locations onsite. Water to be discharged onsite will be analyzed for sampling parameters in accordance with temporary discharge permit requirements. EPA-approved methodologies will be used for these analyses.

### **6.4 Destructive Sample Analysis for PCBs**

Destructive samples will be analyzed according to Section 6.1.4 of the QAMP. Destructive samples may be submitted in the same laboratory batch as soil samples.

## **Section 7**

### **Soil Erosion and Sedimentation Control Plan**

The purpose of the Soil Erosion and Sedimentation (E&S) Control Plan, as set forth in this section, is to control the erosion of excavated soils onsite by wind and water and to minimize the off-site migration of sediments due to excavation and construction operations.

The project-specific E&S Control Plan will be implemented by Texas Eastern to ensure protection of all areas from soil erosion and sediment transportation. The following summary of the E&S Control Plan will be maintained at the Larose Compressor Station for the duration of site remediation. In general, methods used to control soil erosion and sedimentation may include:

- Construction sequencing.
- Control of sediment tracked by vehicular traffic.
- Interception of stormwater run-on/runoff and delivery to a stable area.
- Slope stabilization, if applicable.
- Sediment and stormwater filtration.
- Stabilization or isolation of stockpiled soils.
- Control of soil loss from driveway entrances, exits, streams, natural and man-made drainage ways, and large cleared areas subject to wind or water erosion.
- Limiting the number of locations that are being actively disturbed.
- Temporary stabilization of disturbed areas.
- Permanent stabilization of final graded areas; and
- Dust control.

Control features may include, but are not limited to, silt fences, berms, temporary drainage facilities, vegetative cover and dust monitoring and control. BMPs will be installed, inspected and maintained in a functional condition as well as adjusted, if necessary, for the duration of the remedial activities to ensure that applicable environmental standards are met.

#### **7.1 Control Measures for Excavation Areas**

The measures to control soil erosion and sedimentation, and storm water run-on/runoff at these areas will include, but may not be limited to, the following:

- Placement of an earthen berm or drainage ditch on the upgradient side of the proposed excavation area. If the upgradient side of the excavation area is protected from run-on

by a building or by another structure, an earthen berm or drainage ditch is not necessary on the upgradient side.

- Placement of a silt fence and/or straw bale barriers on the downgradient side of the proposed excavation area.

## **7.2 Control Measures for Temporary Access Roads, Staging Areas, Etc.**

General measures for control of drainage and soil losses associated with the construction of access roads and staging areas will include, but may not be limited to, the following:

- Use of a stabilized construction entrance at the point of transition from the existing paved access road to the unpaved haul road.
- Placement of silt fences on the downgradient side of areas of earth disturbance or road construction where appropriate.
- Installation of culverts or drainage ditches, as required to prevent pooling of stormwater runoff.
- Placement of additional cover or timber matting over pipeline crossings, as required by the Texas Eastern Safety and Operations Representatives.

## **7.3 Sequence of Remediation Activities**

Remediation activities at the Larose Compressor Station are anticipated to proceed according to the following general sequence:

- Site preparation, including workspace boundary delineation and installation of any required BMPs around the workspace boundary.
- Soil excavation at Areas 4C and 6B.
- Verification sampling and expedited analysis.
- Compliance Determination Approval from EPA.
- Final decontamination of all equipment utilized within the OCA; and
- Site restoration activities, including backfilling, final grading and permanent stabilization of areas disturbed during the remediation work. Backfilling and restoration activities may proceed in areas where remediation has been verified.

In general, all necessary erosion, sedimentation and storm water run-on/runoff control structures shall be in place prior to any earth disturbance activities at any area of the Larose Compressor Station. Temporary BMPs locations may be shifted or relocated to best fit the ongoing construction and operations activities onsite. Appropriate BMPs shall be in place, however, at each area prior to

the start of remediation of that area. Backfill and restoration of individual areas, or portions of areas, will proceed immediately following EPA acceptance of verification of remediation in those areas, or portions of areas, where practicable.

## **Section 8**

### **Handling and Discharge Protocols for Remediation Associated Waters**

The following waters or liquids may be associated with OCA remediation:

- Open excavation water.
- Groundwater.
- Remediation equipment decontamination waters; and
- Personnel decontamination waters.

Remediation-associated waters or liquids which are collected will be properly managed for treatment and/or disposal.

## **Section 9**

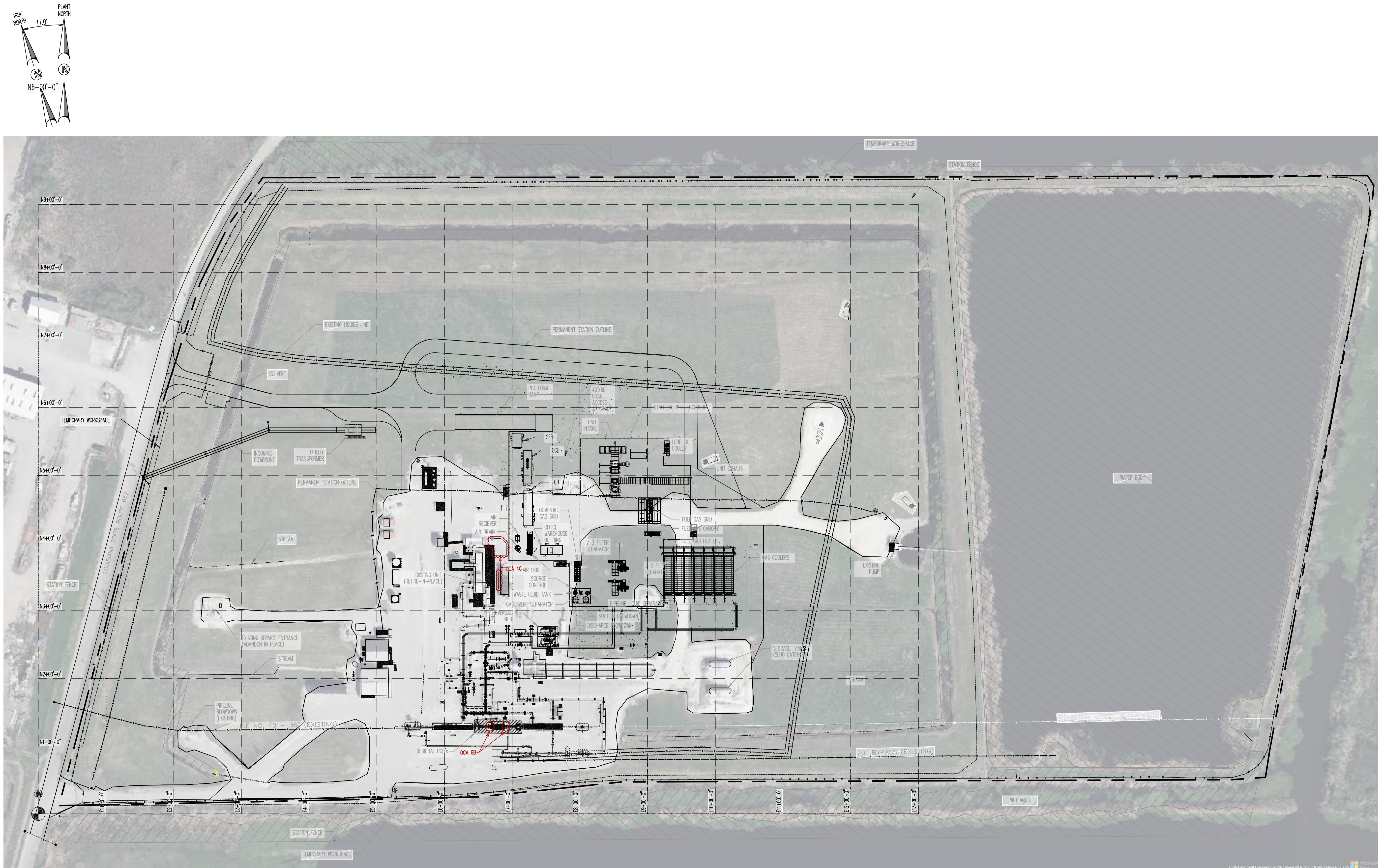
### **Reporting**

Following completion of field activities Texas Eastern will submit an Operational Consideration Area Verification Report documenting OCA remedial actions. The report will include an evaluation of analytical data collected during OCA remediation, figures identifying the extents of excavation and locations of verification samples, documentation of any field revisions, copies of waste manifest, copies of laboratory analytical results, identification of backfill material sources and a summary of site restoration activities.

# Figures

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Figure 1: Site Plan



**DRAFT**

0 35 70 140  
SCALE IN FEET

SOURCE MAP REFERENCE:

DRAWING TITLED: "VENICE EXTENSION PROJECT LAROSE COMPRESSOR STATION HORSEPOWER REPLACEMENT STATION PLOT PLAN", DATED 12/14/22 CREATED BY ENBRIDGE TEXAS EASTERN TRANSMISSION, LP 5400 WESTIMER CT. HOUSTON, TX

| REV. | DATE | STATUS | PRPD BY      | CHKD BY      |
|------|------|--------|--------------|--------------|
|      |      |        | STR 03/11/24 | CHE 03/12/24 |

WSP PROJECT No. 34106019.1533  
DRAWING: 34106019.1533-SITE

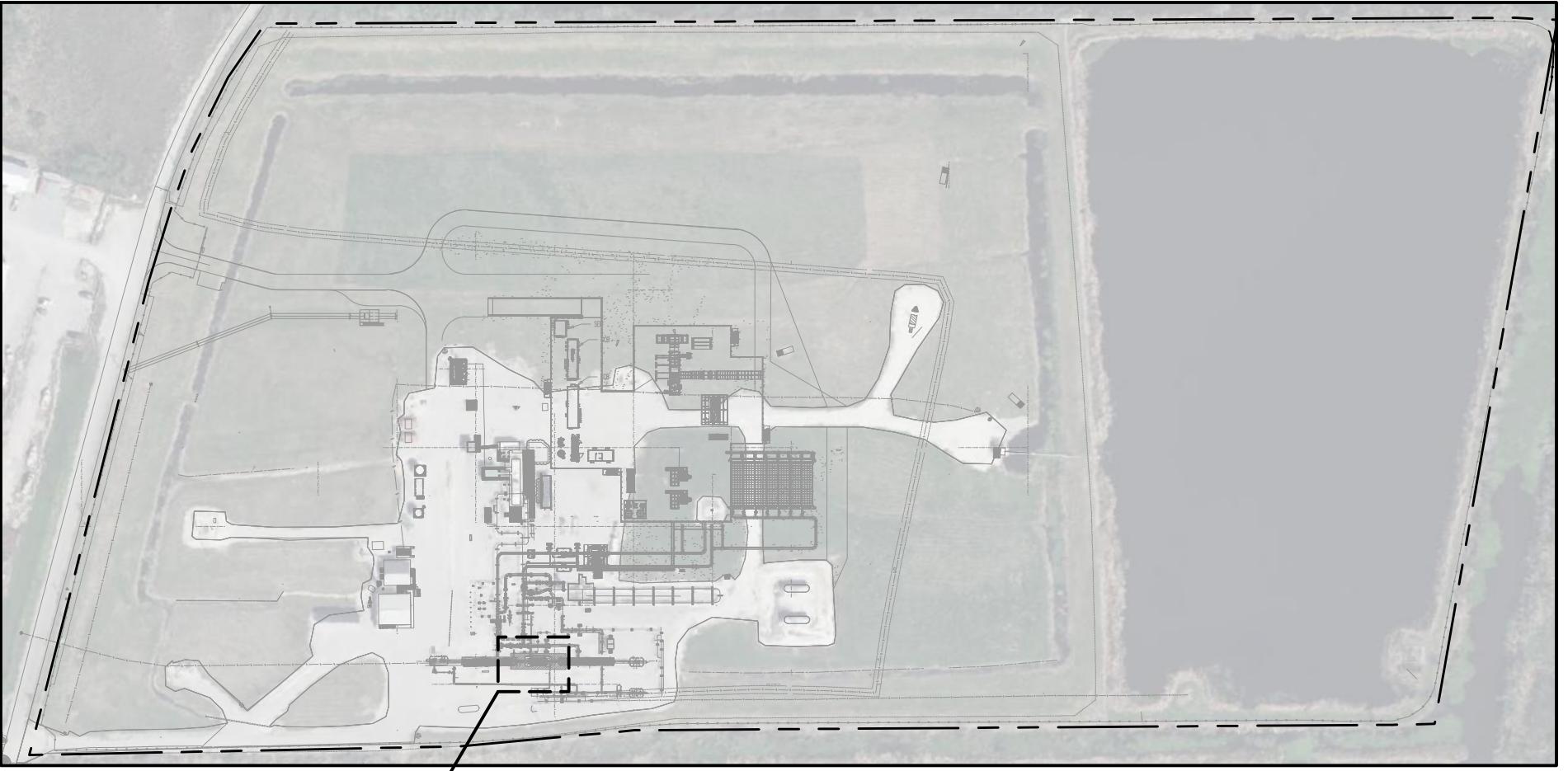
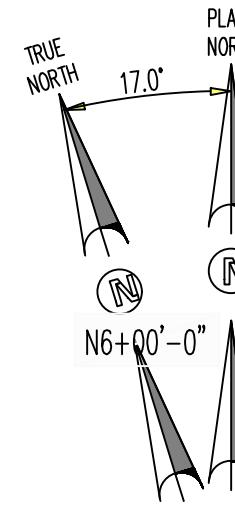
**WSP**  
WSP USA  
ENVIRONMENT & INFRASTRUCTURE INC.  
2000 LENOX DR., 3RD FLOOR  
LAWRENCEVILLE, NJ 08648

**FIGURE 1**  
**SITE PLAN**  
**VENICE EXTENSION PROJECT**  
**LAROSE COMPRESSOR STATION**  
**HORSE POWER REPLACEMENT**  
**LAROSE, LA**

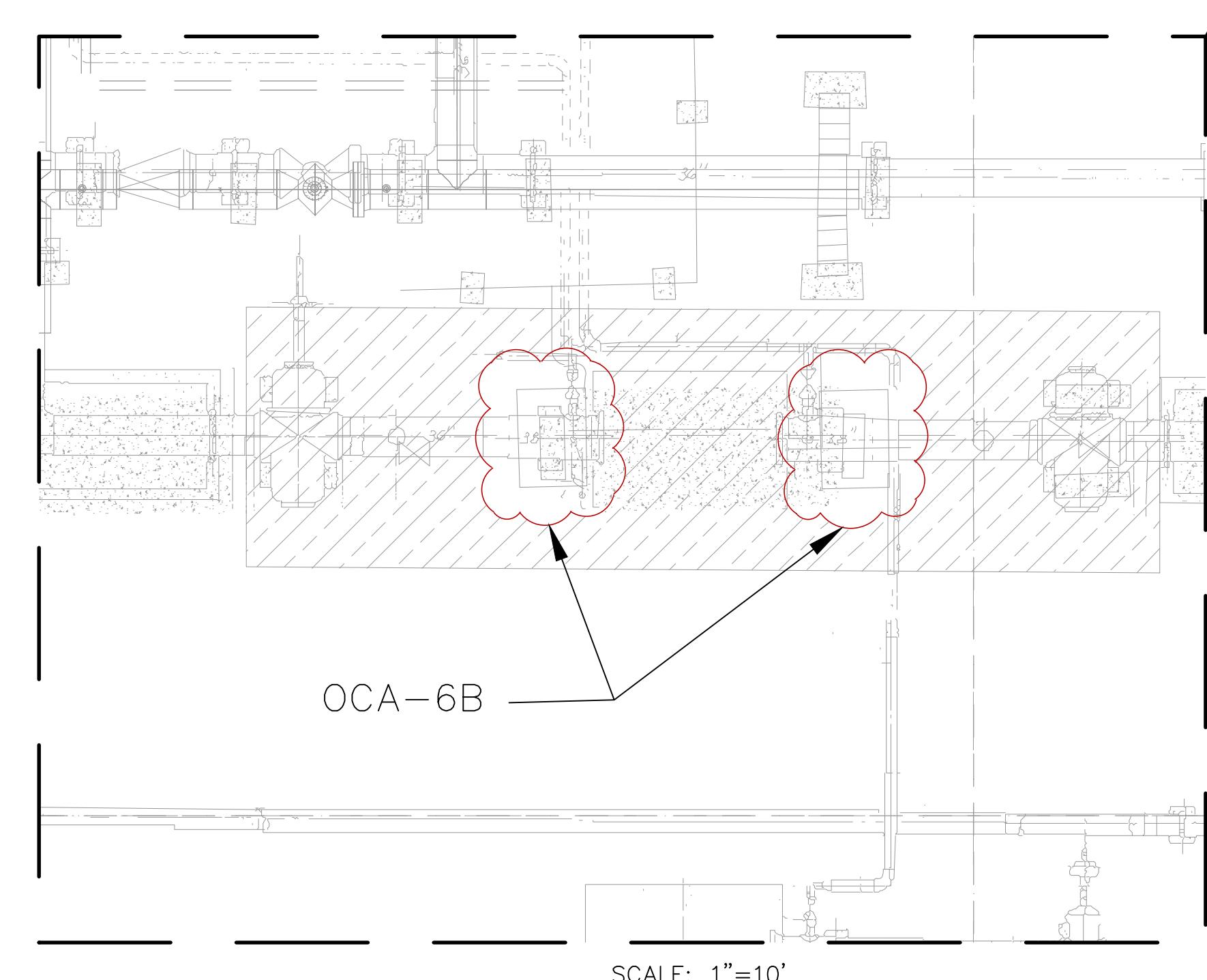
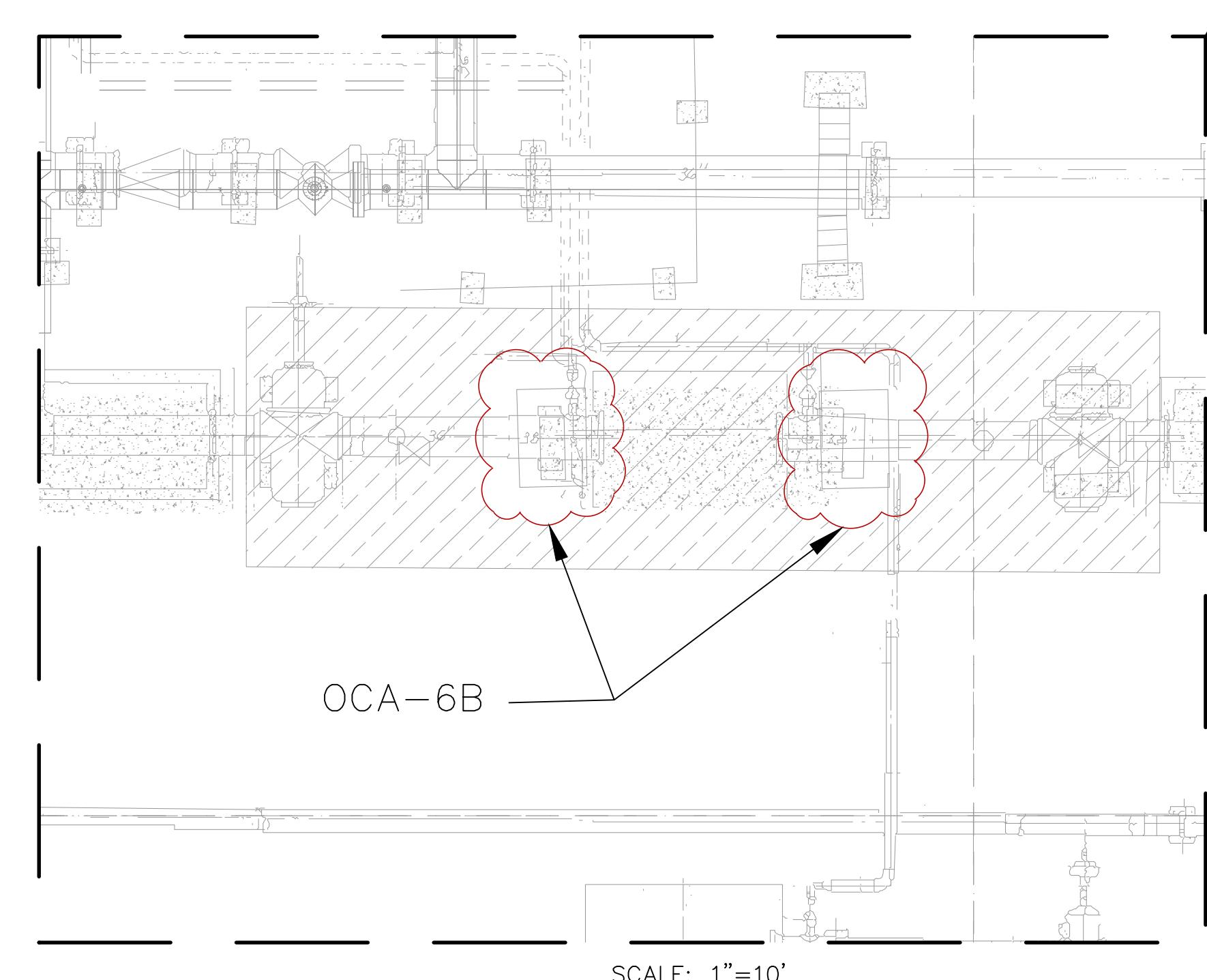
Figure 2: Operational Consideration Area 4C



Figure 3: Operational Consideration Area 6B



KEY MAP  
SCALE: 1"=200'



LEGEND:

- OPERATIONAL CONSIDERATION AREA
- RESIDUAL PCB AREA
- WETLANDS
- WATER BODY
- NEW GRAVEL AREAS
- EXISTING GRAVEL AREAS
- TEMPORARY WORKSPACE
- STATION FENCE
- BURIED PIPELINE (EXISTING)
- WATER BODY
- PERMANENT STATION OUTLINE

NOTE(S):  
 1. HORSEPOWER REPLACEMENT (W.B.S. CE.000177.004.10.06) RETIRE IN PLACE (1) GE FRAME #5, REPLACE WITH (1) NEW SOLAR TITAN-250.  
 2. INCLUDES MAKING STATION CAPABLE OF BI-DIRECTIONAL FLOW.

**DRAFT**

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SCALE IN FEET

|      |      |        |         |         |                                |   |  |   |
|------|------|--------|---------|---------|--------------------------------|---|--|---|
|      |      |        |         |         |                                | WSP PROJECT No. 34106019.1533<br>DRAWING: 34106019.1533-OCA | <br><b>WSP USA</b><br>ENVIRONMENT & INFRASTRUCTURE INC.<br>2000 LENOX DR., 3RD FLOOR<br>LAWRENCEVILLE, NJ 08648 | <b>FIGURE 3</b><br>OPERATIONAL CONSIDERATIONAL AREA<br>VENICE EXTENSION PROJECT<br>LAROSE COMPRESSOR STATION<br>HORSE POWER REPLACEMENT<br>LAROSE, LA |
| REV. | DATE | STATUS | PRPD BY | CHKD BY | PREPARED/DATE:<br>STR 03/11/24 | CHECKED/DATE:<br>JI 03/12/24                                |  |   |

SOURCE MAP REFERENCE:  
 DRAWING TITLED: "VENICE EXTENSION PROJECT LAROSE COMPRESSOR STATION HORSEPOWER REPLACEMENT STATION PLOT PLAN", DATED 12/14/22 CREATED BY ENBRIDGE TEXAS EASTERN TRANSMISSION, LP 5400 WESTIMER CT. HOUSTON, TX

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Figure 4: Operational Consideration Areas – Verification Sampling Layout

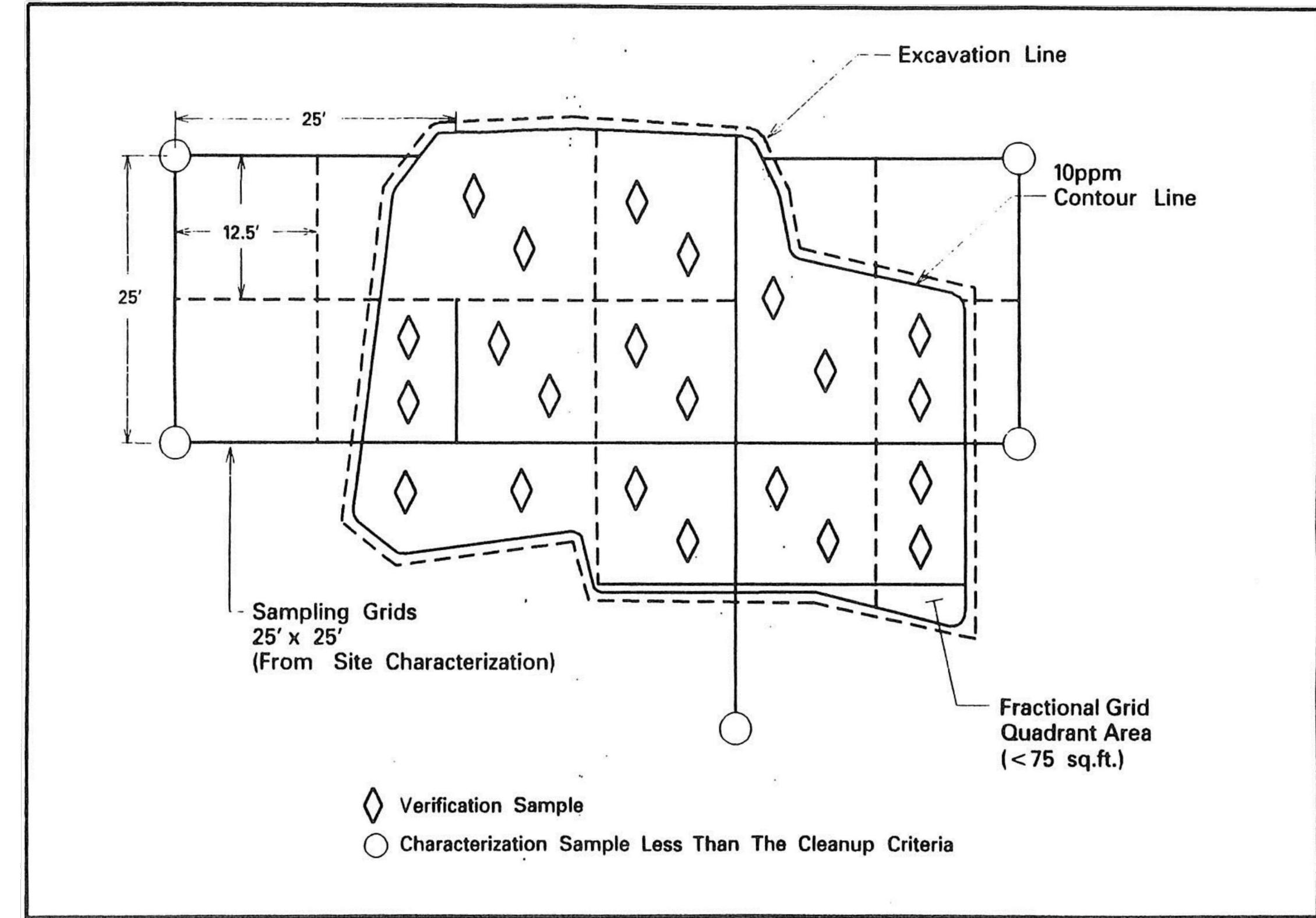


FIGURE GRID SQUARE REDUCTION FOR VERIFICATION SAMPLING FOR  
ONSITE SOILS

**DRAFT**

|      |      |        |         |         | WSP PROJECT No. 3410619.1533<br>DRAWING: 3410619.1533-OCA SHEM |                              |  |  |
|------|------|--------|---------|---------|--|------------------------------|--|--|
|      |      |        |         |         | PREPARED/DATE:<br>STR 03/11/24                                 | CHECKED/DATE:<br>FP 03/12/24 |  |  |
| REV. | DATE | STATUS | DRFT BY | CHKD BY |  |                              |  |  |
|      |      |        |         |         |  |                              |  |  |

**WSP**  
WSP USA  
ENVIRONMENT & INFRASTRUCTURE INC.  
2000 LENOX DR., 3RD FLOOR  
LAWRENCEVILLE, NJ 08648

**FIGURE 4**  
OPERATIONAL CONSIDERATION AREA  
VENICE EXTENSION PROJECT  
LAROSE COMPRESSOR STATION  
HORSE POWER REPLACEMENT  
LAROSE, LA

## **Appendix A - Quality Assurance Management Plan**

This document will be submitted in a separate file.

## **Appendix B - Field Revision Log**

## **COMPLIANCE DETERMINATION APPROVAL**

SITE:

LOCATION:

GENERAL DESCRIPTION:

DATE:

REFERENCE DOCUMENT:

PAGE NUMBER:

SECTION/PARAGRAPH

DESCRIPTION

TEXAS EASTEN:

DATE:

EPA OVERSIGHT CONTRACTOR:

DATE:

ENVIRONMENTAL PROTECTION AGENCY:

DATE:

**FIELD REVISION LOG  
SITE REMEDIATION WORK PLAN**

SITE:

LOCATION:

REVISION DESCRIPTION:

REFERENCE DOCUMENT:

PAGE NUMBER:

SECTION/PARAGRAPH:

**DESCRIPTION OF REVISION (SPECIFIC):**

TEXAS EASTERN:

DATE:

EPA OVERSIGHT CONTRACTOR:

DATE:

ENVIRONMENTAL AGENCY:

DATE: