

10414 McKalla Environmental Remediation Summary

History of the Site

The McKalla Place site was occupied between 1956 and 1985 by Reichold Chemical, a chemical company that manufactured specialty chemicals for the boat and fiberglass industries. The facility closed in 1985 as a result of an explosion. Reichold reported removal of all hazardous materials and received environmental clearance from the Texas Water Commission in December that year. In 1995 the City of Austin purchased the property for a North Service Center, upon completion of pre-purchase Phase I and II Environmental Site Assessments that did not reveal any environmental concerns.

During construction of the service center in 2003, an explosion occurred at the property during excavation activities, injuring several workers. After the explosion, the City immediately halted construction activities and completed multiple investigations to determine the cause of the explosion. A small amount of Benzoyl Peroxide was found in the area of a former holding pond and removed. Extensive remediation was conducted, including excavation to bedrock of the majority of the site. Excavated soils were run through screens to search for small particles of chemical, and when determined to be clean, placed back in the excavation and compacted.

In 2006, environmental clearance to a residential standard for the majority of the site and a restricted industrial/commercial land use standard for a small portion of the site was achieved. Upon additional testing and monitoring in 2015, the Texas Commission on Environmental Quality (TCEQ) issued a final closure letter for unrestricted/residential land use for the entire site on June 26, 2017.

No Potential for Exposure

There is no evidence, nor any expectation, that any residual chemical remains on the site. Because of the volatile nature of chemicals encountered during remediation, and the fact that limited areas of the site could not be excavated to bedrock during remediation, additional due diligence was conducted prior to commencement of stadium construction excavation.

Areas not excavated to bedrock in 2003 were limited to beneath the service center building foundations constructed prior to the explosion, and around electrical transmission pole foundations. The proposed stadium excavation plan was overlaid on the 2003 remediation excavation data to determine any potential areas of concern where stadium excavation may go deeper than 2003 remediation excavations. Geotechnical data from the North Service Center project was consulted, and site tests were conducted to confirm that the native soil was excavated to bedrock prior to the construction of the building foundation pads.

Precautions Moving Forward

An excavation protocol has been established in the Site Specific Safety Plan to address any native soil that may be encountered during stadium construction. If native soil is encountered, excavation in that area will be halted while environmental experts are consulted and a risk assessment conducted prior to resuming excavation. Standard construction environmental controls such as perimeter silt fencing and watering of excavated soils to contain dust have been put in place.

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

December 19, 1985

Dalbey FD
Lee RWC
Coloton MC

Mr. D.E. Wentworth
Vice President - Administration
Reichold Chemicals, Inc.
407 South Pace
Pensacola, Florida 32596

Dear Mr. Wentworth:

Re: Reichold Chemicals, Inc.
Solid Waste Registration No. 30822

We have reviewed the closure completion report for your Austin, Texas facility as supplemented by the information submitted under your cover letter dated December 13, 1985. Our review indicates that the closure has been completed in accordance with the closure plan we approved on July 23, 1985.

In addition, the groundwater analytical data submitted with the December 13th letter indicate that the contaminated groundwater in the area of borehole SB 36 has been recovered. Should you have any questions, please contact Mr. Fred C. Dalbey at (512) 463-7778.

Sincerely,

Merton J. Coloton, P.E., Chief
Enforcement Section
Hazardous and Solid Waste Division

FCD:bh

FED EXPRESS 12/19/85

30822

John Hall, *Chairman*
Pam Reed, *Commissioner*
Peggy Garner, *Commissioner*
Anthony Grigsby, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution
August 15, 1994

Mr. John Oldham
Reichold Chemicals, Inc.
2400 Ellis Road
Durham, North Carolina 27703-5543

Re: Reichold Chemicals, Inc.
Site: 24 acres at Burnet Rd & McKalla Place, Austin, TX
TNRCC Solid Waste Registration No. 30822
EPA ID No. TXD008115990
Site Remediation and Closure
Acceptance of Closure Completion Report

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Dear Mr. Oldham:

This letter is to advise you the Texas Water Commission, the predecessor agency to the Texas Natural Resource Conservation Commission (TNRCC), accepted on December 19, 1985 the closure completion report for the above referenced site. A copy of the acceptance letter is attached. The acceptance letter states that agency review of the closure completion report (dated December 13, 1985) indicated that the closure was conducted in accordance with the approved closure plan and that contaminated groundwater was recovered.

It is possible that some residual contamination, of which this agency is not aware of, remained at the site. Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by Title 30 Texas Administrative Code (TAC) §335.4. If the actual closure fails to comply with these requirements, the burden remains upon responsible persons to take any necessary and authorized action to correct such conditions.

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Mr. Oldham
Page 2

If you have any questions regarding this matter, please contact Luis E. Campos of the Closure Team in Austin at 512/239-2369.

Sincerely,



Richard Clarke, Leader
Closure Team, Corrective Action Section
Industrial and Hazardous Waste Division

LEC:lec

Enclosure

cc: Mr. Leo Wood, Water & Wastewater Dept, City of Austin,
625 East 10th Street, Suite 104, Austin, TX 78701
Mr. Larry Smith, TNRCC Region 11 Office, Austin, TX

Figure A-7: TCEQ No Further Action Letter, Page 1 of 2

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



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DIVISION

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 13, 2006

Mr. Steve Nelson
City of Austin Public Works Department
505 Barton Springs Road, Suite 900
Austin, TX 78704

Re: Receipt of Proof of Institutional Control and Data Usability Summary - Approval of Affected Property Assessment Report and Response Action Completion Report
City of Austin North Service Center formerly Reichhold Chemical, Inc., 10715 Burnet Road, Austin, Travis County, TX
TCEQ SWR No. 30822
EPA ID TXD008115990

Dear Mr. Nelson:

The Texas Commission on Environmental Quality (TCEQ) has received the copies of the proofs of institutional control filed in Travis County for the two areas wherein the remediation and cleanup attained the Texas Risk Reduction Program (TRRP) Remedy Standard A Commercial/Industrial Protective Concentration Levels (PCLs). The proofs of institutional control were submitted to comply with the requirements of 30 Texas Administrative Code (TAC) §350.31(g) and were submitted to the TCEQ via the City of Austin letter dated January 30, 2006. In addition, the TCEQ received the Data Usability Summary (DUS) for the laboratory analytical reports associated with the remediation and cleanup at the above-named site. The DUS was prepared by Shaw Environmental and submitted to the TCEQ on December 1, 2005. Both the proofs of institutional control and the DUS were requested in a TCEQ letter dated November 3, 2005, which conditionally approved the Affected Property Assessment Report (APAR) and the Response Action Completion Report (RACR) pending submission of the proofs of institutional control and the DUS.

In order to attain Remedy Standard A - Commercial/Industrial under TRRP, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated from affected media (i.e., soil, surface water, groundwater, air) to applicable human health and ecological based standards and criteria as specified in 30 TAC §350.32.

Based on the TCEQ review of the institutional controls and DUS, the TCEQ approves the APAR and RACR. The TRRP Remedy Standard A Commercial/Industrial PCLs have been achieved. The TCEQ concurs that the institutional control requirements of 30 TAC §350.31(g) and subsequent reference to §350.111 have been completed. Furthermore, the institutional control was filed in accordance with 30 TAC §350.34(1) to note commercial land use is in effect for Remedy Standard A; consequently, no further action is required.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

printed on recycled paper using soy-based ink

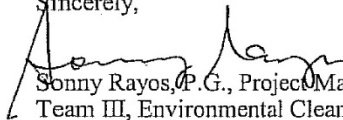
Figure A-8: TCEQ No Further Action Letter, Page 2 of 2

Mr. Nelson
SWR ID No. 30822
Page 2
March 13, 2006

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual response action fails to comply with these requirements, the City of Austin shall take any necessary and authorized action to correct such conditions.

Please call me at 512.239.2371 or email me at srayos@tceq.state.tx.us if you have any questions concerning this letter.

Sincerely,


Sonny Rayos, P.G., Project Manager
Team III, Environmental Cleanup II
Remediation Division
Texas Commission on Environmental Quality

cc: Mr. John Barry, Shaw Environmental, Inc., 8501 N. Mopac Suite 320, Austin, TX 78759
Waste Program Manager, TCEQ Region 11, Austin, TX



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 26, 2017

Mr. Steve Nelson
City of Austin
P.O. Box 1088
Austin, Texas 78767

Re: Approval with Comments
Letter Report – City of Austin North Service Center, Former Reichhold Chemical Company, dated February 8, 2017
Meeting Held at TCEQ on November 29, 2016
SWR No. 30832, RN102321387, CN919401123

Dear Mr. Nelson:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced report. At the meeting referenced above, the City of Austin (COA) informed the TCEQ that the site was closed in 2006. Two comparatively small areas, one with a soil exceedance above the residential assessment level (RAL) for selenium and one with a soil exceedance above the RAL for benzyl peroxide (BP), were closed using commercial/industrial (C/I) protective concentration levels (PCLs) and filing an applicable deed notice. The purpose of the meeting was to evaluate how the COA may achieve a residential closure for the two areas. The TCEQ suggested that one method that could be evaluated was to determine the depth to groundwater at the site and then calculate a Tier 2 PCL for selenium and BP.

Comments

1. COA installed two wells at the site in December 2016. The depth to groundwater was used to calculate a Tier 2 PCL for both selenium and BP. Based on the calculations, which were done correctly, the soil concentrations of both selenium and BP are below the Tier 2 PCLs.
2. The two wells can be plugged.
3. Please submit both a superseding deed notice that describes the removal of the C/I land use restriction and a request for closure within 60 days from the date of this letter.

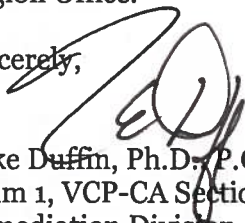
Please note that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4.

Mr. Nelson
Page 2
June 26, 2017
SWR No. 30822

Questions concerning this letter should be directed to me at (512) 239-2378. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ

Remediation Division at Mail Code MC-127 with an additional copy submitted to the local TCEQ Region Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Duffin", is written over the word "Sincerely," and extends slightly below the name.

Mike Duffin, Ph.D., P.G.
Team 1, VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

MED/bk

cc: Mr. David Mann, Waste Section Manager, TCEQ Region 11 Office, Austin

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 19, 2017

Mr. Steve Nelson
City of Austin
P.O. Box 1088
Austin, Texas 78767

Re: Approval
Request for Closure, dated December 18, 2017
City of Austin North Service Center, Former Reichhold Chemical Company
SWR No. 30832, RN102321387, CN919401123

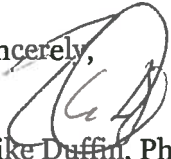
Dear Mr. Nelson:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced submittal. In the last TCEQ letter issued, dated June 26, 2017, the TCEQ requested that an executed deed notice with proof of filing be submitted. Once that information was received by the TCEQ, the site will have met conditions for closure. Based on both the submitted superseding deed notice and proof of filing, no further action at the site is necessary.

Please note that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4.

Questions concerning this letter should be directed to me at (512) 239-2378. When responding by mail, please submit one paper copy and one electronic copy (on USB or disc) of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted in electronic format to the local TCEQ Region Office.

Sincerely,


Mike Duffin, Ph.D., P.G.
Team 1, VCP-CA Section
Remediation Division

MED/bk

cc: Mr. David Mann, Waste Section Manager, TCEQ Region 11 Office, Austin