

CONCEPTUAL RESPONSE ACTION PLAN **FORMER EXIDE FACILITY, FRISCO, TEXAS**

1.0 SUMMARY OF CONCEPTUAL RESPONSE ACTION PLAN

At the request of the City of Frisco (City), GDS Associates, Inc. (GDS) developed this summary of a Conceptual Closure Plan (a Conceptual Response Action Plan or RAP) for the former Exide facility and affected properties adjacent and downstream of the Exide facility to achieve the regulatory closure performance standard established under the rules of the Texas Commission on Environmental Quality (TCEQ) and the U.S. Environmental Protection Agency (EPA). This plan is based on prior estimates and work performed by Cook-Joyce, Inc. (CJI) and Apex Companies LLC (Apex).

Implementation of this RAP, together with long-term maintenance, should minimize to the extent necessary to protect human health and the environment, the post-closure escape of waste, contaminants, leachate, run-off, or decomposition products to the surrounding environment. This RAP consists of an overall technical approach for control and containment of wastes and contaminated media associated with the former Exide facility, as well as a more detailed scenario for implementing the overall technical approach based largely on information that was readily available in June 2013. Additional information available through July 2016 regarding the conditions in Stewart Creek and at the former Exide facility have also been considered.

The former Exide facility consists of two primary areas. The part known as the “Bowtie” consists of the former operating plant (FOP), the Class 2 Landfill, the South Landfill, the Crystallizer, and adjacent areas within the RCRA¹ permit boundary. The surrounding buffer areas are known as the J Parcel. The J Parcel is being remediated under the TCEQ Voluntary Cleanup Program (VCP #2541). The area of Stewart Creek downstream of the Exide property that has been contaminated by Exide wastes (battery casing chips and furnace slag) is known as the Stewart Creek Remediation Area (SCRA). Both the J Parcel and the SCRA are being addressed in separate RAPs and are referenced in this RAP as necessary. The SCRA RAP is being addressed regulatorily under this overall FOP RAP. The Class 2 Landfill is included under this overall FOP RAP but is subject to closure under a separate Administrative Order² (AO) between Exide and TCEQ.

An overall plan view of the former Exide facility and surrounding property is provided as Figure 1.

In general, this RAP entails:

- 1) Identifying and obtaining the appropriate regulatory authorization(s) for the FOP³ that will authorize closure and post-closure care of the FOP, including the consolidation within the

¹ Resource Conservation and Recovery Act.

² Agreed Order Docket No. 2013-2207-IHW-E, signed by TCEQ Executive Director and Exide on 12 March 2015; approved by the Commission on April 15, 2015.

³ The FOP refers to the contiguous area encompassing the Slag Landfill, the North Disposal Area, and the main portion of Exide’s former facility (where battery breaking, smelting, and other industrial processes occurred). It is roughly bound by Eagan Way to the east, Stewart Creek to the south, and the North Tributary to the north.

FOP of remediation wastes excavated from adjacent and downstream areas. Exide will obtain a Corrective Action Management Unit (CAMU) designation for the FOP.

- 2) Decontamination and demolition of remaining Exide industrial facilities at the FOP. Those facilities include the crystallizer, wastewater treatment plant, and the administration building.
- 3) Consolidation of excavated soils and sediments from the J Parcel remediation and the Stewart Creek remediation within the FOP for site contouring, and in accordance with the AO, in the remaining capacity of the Class 2 Landfill.
- 4) Installation of engineered barriers to isolate and contain the waste releases from RCRA units and contaminated media within the FOP, the Class 2 Landfill, and historic disposal areas used by Exide. Based on the characterization of subsurface conditions⁴, adequate containment can be achieved through:
 - a. Installation of a clay cap over the South Disposal Area.
 - b. Repair of the existing cap over the previously-filled portion of the Class 2 Landfill where soil contamination has been documented.
 - c. Construction of a bottom and sidewall liner system over the excavated but unlined portion of the Class 2 Landfill. Once the bottom liner system is completed, remediation wastes will be consolidated in the landfill and the final cover system will be completed over the uncapped portion of the landfill.
 - d. Installation of a slurry wall around the FOP to provide a vertical barrier and control system that will minimize future migration of contaminants from wastes and affected media that are currently present and remediation wastes that are to be consolidated within this area and to prevent the future infiltration of upgradient groundwater into the FOP.
 - e. Removal of contaminated materials that will remain between the slurry wall and Stewart Creek.
 - f. Construction of a final cover system over the entire FOP area contained within the slurry wall and appropriate stabilization/armoring of the southern portion of the FOP adjacent to Stewart Creek.

Specifics of the engineering controls that will be necessary for proper closure of the former Exide facility and affected properties located adjacent and downstream of the facility will be established to meet the general closure performance standard identified above and any additional regulatory requirements that may be applicable. However, a slurry wall provides a proven long-term containment technology in a geologic setting such as that at the former Exide facility. This closure scenario was originally developed for budgetary planning purposes for the City, and served as the basis for CJI's detailed 2015 analysis of the potential costs for closure of the former Exide facility.

Due to the potential for remediation activities to generate air-borne releases of contaminated particulates, particularly lead, these activities will only be conducted when sustained winds remain less than 20 mph and when real-time monitoring of air-borne lead concentrations confirm acceptable conditions. Air monitoring requirements anticipated for the remediation activities are

⁴ *Revised Affected Property Assessment Report and Tier 2 Screening Level Ecological Risk Assessment, Exide Technologies Frisco Recycling Center; Frisco, Texas, by Golder Associates Inc., dated May 22, 2014.*

commensurate with those that will be required during closure of the Class 2 Landfill, as specified in the AO.

2.0 DETAILED CLOSURE SCENARIO DESCRIPTION

The following subsections provide a detailed description of the closure scenario developed by CJI in March 2015 to develop budgetary estimates for the City. The closure scenario has also been reviewed and modified by GDS Associates.

2.1 PERMITTING/AUTHORIZATION

The AO required (1) the submittal of a Risk Assessment prepared by Golder Associates⁵ (Golder) that evaluated closure scenarios for the Class 2 Landfill, and (2) affirmation that the information provided by the Risk Assessment satisfies the technical criteria for designation of the Class 2 Landfill as a CAMU. The AO also required:

- The submittal of a detailed Final Closure Plan for the Class 2 Landfill CAMU, demonstrating how the Class 2 Landfill CAMU will be closed in accordance with 40 C.F.R. §§ 264.112 and 264.552 and Provision No. 2.h.(3) of the AO.
- The submittal of a revised Part B permit renewal application as well as a Post Closure Authorization Application to address post-closure care of the Class 2 Landfill CAMU.
- The submittal of any other permit modifications that become necessary for corrective action, closure or post-closure care during the course of the currently ongoing plant decommissioning activities. Such permit modification applications could be submitted with or in advance of the modification application required for the Class 2 Landfill post-closure care.

A hazardous waste CAMU designation will be obtained to cap and close the FOP as a waste control unit. A CAMU is necessary because there has been a documented hazardous waste release from the RCRA permitted unit. That hazardous waste release must be addressed but clean closure of this unit is no longer practical. Use of a CAMU will allow the hazardous waste to remain in place because the entire area will be a permitted hazardous waste control unit. A CAMU to address the hazardous waste release will also allow contaminated sediment removed from Stewart Creek to be dewatered and returned to the FOP for consolidation and disposal.

A risk evaluation of the proposed waste control unit and appropriate Part B and/or post-closure care applications will be required to satisfy the terms of the AO and applicable hazardous waste regulations.

2.2 CLASS 2 LANDFILL CLOSURE

As noted above, the AO required the submittal of a detailed Final Closure Plan for the Class 2 Landfill to demonstrate how the Class 2 Landfill CAMU will be closed in accordance with 40 C.F.R.

⁵ Identified in the AO as *Exide Class 2 Landfill Risk Evaluation of Remedial Alternatives*, Golder Associates, dated August 2014. (CJI has not seen nor reviewed this document.)

§§ 264.112 and 264.552 and the terms of the AO. That Closure Plan was submitted by Exide and approved by the TCEQ in 2015.

The Final Closure Plan provides detailed engineering plans for the cap to be installed over Cells 10 through 15 of the landfill. In addition to the cap to be constructed per the AO, a liner and leachate collection system on which Golder's Risk Assessment was based must be completed over Cells 10 through 15 of the landfill and tied into the landfill's existing liner and leachate collection systems. The liner system is anticipated to include a minimum of 3 feet of compacted clay, a geomembrane (e.g., a 40-mil High-Density Polyethylene [HDPE] flexible membrane liner [FML]), and a geocomposite leachate collection system.

Once the liner system has been installed, the remaining disposal capacity within the Class 2 Landfill will be filled with Class 2 non-hazardous remediation waste from the J Parcel and other Class 2 remediation waste approved in the Final Closure Plan for the Class 2 Landfill CAMU. Based on Pastor Behling Wheeler, LLC (PBW's) February 5, 2013 calculations, the remaining capacity of the Class 2 Landfill after completion of the liner system is approximately 44,000 cubic yards. For the 2015 remediation cost estimate CJI assumed that approximately 47,450 cubic yards of soil would be excavated from the J Parcel. GDS has used that estimate in the preparation of this Conceptual RAP.

There is a portion of the existing Class 2 Landfill cap that has been documented to be contaminated. It is assumed that these contaminated soils will be removed and disposed in the Class 2 Landfill CAMU, or, alternatively, will be stockpiled on the FOP for incorporation into the FOP CAMU, and the cap system over these areas will be restored to original specifications.

After the remaining capacity of the Class 2 Landfill has been filled, the cover system will be completed over the waste materials and "fully integrated with the existing cap" in accordance with the AO and the approved Final Closure plan.

GDS anticipates that no remediation will be necessary for the selenium reported in in groundwater from monitoring well LMW-9. Instead, GDS believes that a plume management zone (PMZ) will be adequate to control and monitor the potential impacts in that area. Groundwater monitoring of the PMZ on a frequency acceptable to TCEQ is anticipated to be required until plume stability is demonstrated.

2.3 DECONTAMINATION, DEMOLITION, AND ADDITIONAL ASSESSMENT

There are remaining facilities at the FOP that require decontamination and demolition. They include the crystallizer and the wastewater treatment plant. Other facilities that require demolition are the fire training building and the administration building.

2.3.1 Crystallizer Demolition

The Crystallizer and associated above ground piping, tanks, and ancillary equipment will be decontaminated and removed or demolished on a parallel path with the J Parcel remediation. The decontamination and demolition of the crystallizer will be performed in conjunction with the approved *Decontamination and Demolition Work Plan* (PBW January 2013). After the crystallizer

has been removed, Exide has proposed and the TCEQ confirmed that additional assessment in that area will be required. The scope of that assessment has not been defined. In GDS' opinion the assessment should include the following:

- Collection of surface soil samples near the former crystallizer frac tank and the entry road.
- Installation of at least 10-foot deep borings within the footprint of the former crystallizer unit, including the area under the upright and frac tanks associated with the unit.
- Installation of at least one monitoring well within the former footprint of the crystallizer building and/or its ancillary tank area.
- Soil and groundwater samples should be analyzed for arsenic, antimony, cadmium, lead, selenium and sulfate.

If additional contamination is reported during the crystallizer assessment those areas should be added to the overall FOP RAP.

2.3.2 Demolition of Other Facilities

Other facilities remaining at the site will be demolished on a parallel track with performing the soil remediation and consolidation at the FOP. Additional assessment in these areas is not considered necessary at this time, because the wastewater treatment plant, the former fire training building and the administration building are inside the proposed FOP CAMU.

2.4 STEWART CREEK REMEDIATION

Based on analytical data of sediment samples obtained by Apex (formerly Southwest Geoscience) and Golder, sediment in Stewart Creek is contaminated with arsenic, cadmium, and lead, as well as battery casing chips and furnace slag. In addition, battery casing chips and furnace slag have been observed in sidewall soils at various locations. The remediation of Stewart Creek is addressed in a separate SCRA RAP. That document should be referenced for SCRA remediation sediments and soil volumes.

2.5 BOWTIE REMEDIATION

2.5.1 Targeted Remediation of the "Bowtie" Property

GDS proposes targeted remediation in contaminated Bowtie areas that are outside of the FOP that will be capped and contained. Soil excavated from those areas may be used as contouring fill under the cap. These areas will include:

- 1) Portions of the "South Field" (the area adjacent to and east of the South Disposal Area), the area along "Crystallizer Road", and the "Wooded Strip" (located between the Class 2 Landfill and the former Exide facility) that have lead concentrations that exceed 275 mg/Kg⁶; and

⁶ The tier 2 PCL for lead that has been calculated for the Exide site is 275 mg/Kg.

- 2) Portions of the "Lake Parcel" and areas adjacent to Stewart Creek that have lead concentrations that exceed 250 mg/Kg⁷ (the City may integrate the Lake Parcel with the J Parcel).
- 3) The area adjacent to or under the crystallizer may also require remediation if contamination is found in that area after the demolition of the crystallizer is complete.

Based on conditions known in February 2014, CJI estimated the minimum excavated soil volume at approximately 22,050 cubic yards⁸. CJI modified that estimate to ~25,650 cubic yards based on information provided in the May 22, 2014 Revised FOP APAR. Finally, for cost estimating purposes CJI assumed that approximately 33,350 cubic yards will be excavated (a ~30% increase over 25,650 cubic yards). GDS used that estimate in the preparation of this RAP.

The remedial excavations will be considered complete when confirmation samples indicate that the contaminated soil has been removed. Woody vegetation in some of these areas will also need to be removed and mulched prior to excavating the contaminated soil.

The maximum depth of the majority of the excavated areas for targeted remediation on the Bowtie property is anticipated to be 1 foot. These areas will be graded for drainage and a vegetative cover will be established over the disturbed soil surface, unless bedrock is exposed at the ground surface of excavated areas. In those instances a small amount (~3-4 inches) of clean fill will be placed on the exposed bedrock prior to reseeded to facilitate grass growth.

Deeper excavations will be backfilled using clean fill, prior to establishment of a vegetative cover over the backfilled excavations. If necessary, potentially contaminated rain water that may collect in partially-completed excavations (excavations where confirmation of contaminant removal has not yet been obtained) may be pumped or transported to Exide's stormwater management pond.

2.5.2 FOP Isolation and Containment

In-place closure of the FOP, in which significant contamination remains in the subsurface, is the centerpiece of the Exide facility closure. Impacted waste and media from adjacent and downstream properties will also be consolidated in this area. This RAP includes installation of a slurry wall to encompass the entire FOP, including the main portion of Exide's former battery recycling facilities, the Slag Landfill, the North Disposal Area, and other adjacent contaminated areas. The slurry wall will be keyed into the confining Eagle Ford Shale that underlies the shallow soils across the FOP. An engineered cover system will be constructed over the entire surface area bounded by the slurry wall, thereby isolating the contaminants within the slurry wall, the

⁷ A residential cleanup level of 250 mg/Kg is the contractually agreed upon residential cleanup value on the J Parcel.

⁸ Contaminated areas were derived from a combination of PBW documents prepared on Exide's behalf, including the 2012 Site Investigation Report (SIR), the 2013 Affected Property Assessment Report (APAR), the 2013 Screening Level Ecological Risk Assessment (SLERA), and the Lake Parcel Letter. The 2014 Revised FOP APAR by Golder Associates, Inc. was also used to determine contaminated areas.

overlying cover system and the underlying Eagle Ford Shale. These conceptual design elements are discussed further, below.

Vertical Barrier System

Demonstration of the adequacy of the engineering controls that will be necessary for proper closure of the FOP CAMU (40 CFR §264.550-552). A slurry wall provides a proven long-term containment technology in a geologic setting such as that at the Exide site. In addition to providing a vertical barrier to downgradient contaminant transport, installation of a slurry wall around the entire FOP (upgradient as well as downgradient) provides a control system that will minimize infiltration of groundwater into the waste control unit from upgradient areas and allow long-term control of groundwater levels within the slurry wall to eliminate any internal hydraulic force for potential contaminant migration.

General design elements of a slurry wall at this location include:

- 1) Geotechnical borings installed along planned slurry wall alignment at appropriate distance intervals to determine the depth to the underlying Eagle Ford Shale.
- 2) An excavation approximately 3 feet wide from ground surface to a depth that extends approximately 2 feet into the Eagle Ford Shale (based on the results of the geotechnical borings), that is advanced along the slurry wall alignment.
- 3) A bentonite slurry that is used to keep the excavation open while the wall material is being mixed.
- 4) The slurry wall material, a mixture of bentonite clay, bentonite slurry, and native fined grained soils, which are mixed and moved into the excavation. The slurry wall material displaces the initial bentonite slurry to create the final slurry wall barrier.
- 5) A clay cap installed over the slurry wall, to be ultimately incorporated into the clay component of the engineered cover system that will cover the entire FOP.

As the slurry wall is installed, recovery wells will be used to lower the water table in the area inside the wall to facilitate construction. It is anticipated that additional recovery wells will need to be installed for construction and longer-term groundwater recovery. Initially, groundwater recovered from the area inside the slurry wall will be treated in Exide's on-site wastewater treatment unit. After the demolition of the wastewater treatment plant, recovered groundwater will either be discharged in accordance with specific TCEQ authorization or will otherwise be disposed at an authorized off-site facility.

Special Design Considerations

Additional design details will be needed for the portions of the FOP adjacent to Stewart Creek and the North Tributary, including the installation of riprap or rock gabions to armor the containment system in appropriate locations. Along the southern portion of the FOP adjacent to Stewart Creek, a portion of the FOP will remain outside the slurry wall barrier, as some structural support will be needed along the exterior face of the barrier. This area will require special design considerations and specifications, to include adequate measures for encapsulation or removal of the contaminated material that must be closed in-place.

Potential design elements that may be incorporated to address these special considerations include the following:

- 1) Removal and/or plugging of the entire length of the sanitary sewer line that runs inside the flood wall on the south side of the FOP.
- 2) Providing alternative structural support for the southern perimeter of the FOP and removing the majority of contaminants outside the slurry wall barrier by:
 - a. driving sheet pilings between the exterior alignment of the barrier and the southern edge of the FOP, anchoring them into the underlying shale formation; and
 - b. excavating the material outside the sheet pilings (ie, adjacent to the creek), then restoring and armoring that area.

Final Cover System

As noted above, the soils excavated from the J Parcel, Bowtie, Stewart Creek, and other remedial excavations that are not disposed in the Class 2 Landfill will be used on the FOP. These materials will be compacted over the area encompassed by the slurry wall to provide a suitable subgrade on which to construct the final cover system. Final grades of the compacted fill material will be established to eliminate any "stick-up" of concrete foundations or pavement above the finished subgrade and to achieve surface contours that will promote positive drainage off of the final cover system. The overall final contours may be further modified to accommodate post closure uses of the site.

After a suitable subgrade has been prepared over a portion of the FOP area, that portion of the area will be capped with an engineered final cover system. The cover system will be completed in a sequential manner until it has been completed over the entire area. General design elements of the final cover system are anticipated to include:

1. A minimum 3 foot thick layer of clay compacted in lifts over the prepared subgrade materials to achieve a maximum allowable hydraulic conductivity through the clay layer of 1×10^{-7} cm/sec as confirmed by testing.
2. An HDPE (or equivalent) FML installed over the compacted clay layer.
3. A geosynthetic drainage layer (geonet and geotextile filter) installed over the FML.
4. A minimum of 3 feet of cover soil placed over the FML to protect it from root penetration, animal activity, and sunlight exposure, to include a minimum of 1.5 feet of topsoil to be vegetated with a climate appropriate vegetative mix.

2.5.3 South Disposal Area

Although some Austin Chalk is found in the general vicinity of this historic landfill disposal unit, a slurry wall is not considered necessary for the vertical containment of this unit due to the apparent continuity of the clay stratum in the immediate area in which the South Disposal Area was placed and by the absence of documented groundwater contamination in the area immediately surrounding the landfill. To minimize potential surface water infiltration and generation of leachate in the future, the detailed closure scenario involves capping the South Disposal Area with 3 feet of compacted clay and an HDPE (or equivalent) FML. It is anticipated that the FML will be covered with a minimum of 12 inches of topsoil and seeded with an appropriate vegetative mixture.

2.5.4 Removal of Ponds

The detailed closure scenario assumes that both the contaminated water (leachate) pond located adjacent to the Class 2 Landfill and the contact stormwater pond located south of Stewart Creek will be removed near the end of the project. Both may be maintained in active status during the remediation activities to provide storage capacity for leachate, contact stormwater, and other potentially contaminated waters that will be collected during these activities.

When the ponds are no longer essential for management of potentially contaminated waters generated on-site, and as the final cover system over the FOP is being constructed but before all shaping fill has been placed, the contaminated water and contact stormwater ponds will be removed. It is anticipated that each pond will be closed in a similar manner: the synthetic liner will be removed, cut up (as necessary), and disposed within a portion of the FOP that has not received the clay cover. Soil samples will be collected from the clay material under the plastic liner, and any soils impacted above the PCLs established for the FOP will be excavated and also disposed within a portion of the FOP that has not received the clay cover.

In addition to removing the ponds, the subgrade piping connecting the stormwater pond to the Exide facility will need to be removed, and soil samples along the stormwater pipe excavation will be required to ensure that any soils with contaminant concentrations above the clean-up standard are removed. Any contaminated soil and the removed piping will be disposed on-site within a portion of the FOP that has not received the clay containment layer.

After the pond liners and contaminated soil associated with the former ponds have been removed, the pond excavations will be backfilled using clean fill. After backfilling, the former pond areas will be seeded to establish a climate appropriate vegetative cover.

2.6 REMAINING TASKS

Remaining tasks to be conducted during the closure activities include:

- 1) Off-site disposal of any remaining investigation derived waste (IDW).
- 2) Off-site disposal of leachate, purge water, any stormwater or sediment dewatering liquids.
- 3) The potential installation of a sedimentation basin on Stewart Creek within the Exide property boundary as necessary for restoration of Stewart Creek.

Additional monitoring wells are will be installed and used along with the existing monitoring well network to perform post-closure groundwater monitoring. A minimum of three additional monitoring wells is envisioned, with one of the new wells positioned to provide additional monitoring of the Class 2 Landfill, another positioned to provide additional monitoring of the South Disposal Area, and the remainder positioned to provide additional monitoring capability for the FOP.

3.0 POST-CLOSURE MAINTENANCE AND MONITORING

A 30-year post closure monitoring and maintenance plan is anticipated to be required for the FOP CAMU and the Class 2 Landfill CAMU. Up to 30 years of post closure monitoring and maintenance could be required for the South Disposal Area.

As noted above, additional monitoring wells will be installed as part of final facility closure for monitoring the quality of the shallow groundwater in accordance with the approved post closure care plan. In addition to post-closure groundwater monitoring, it is anticipated that monitoring of Stewart Creek will be required under the approved post closure care plan. Three stations within the creek system are anticipated to be designated as monitoring stations: one on Stewart Creek upgradient of the Exide site, one on the North Tributary of Stewart Creek upgradient of the FOP, and one on Stewart Creek downgradient of the confluence of Stewart Creek & the North Tributary, which is also downgradient of the FOP.

Required post closure maintenance activities are anticipated to consist of inspections, leachate collection, cover mowing and maintenance, maintenance of security systems, and maintenance of monitoring wells and stations. Reports documenting the post closure activities will be submitted to TCEQ as required by the terms of the approved post closure plan.

4.0 GENERAL COMMENTS AND DISCLAIMERS

GDS developed this Conceptual Response Action Plan for the former Exide facility with the degree of care used by professionals of ordinary prudence concurrently practicing the same or similar profession under the same or similar circumstances. As indicated above, GDS based this Conceptual Response Action Plan on previous documents prepared by CJI, including draft documents attached to the 2015 remediation estimates.

This Conceptual Response Action Plan is based on GDS' review of available information and currently applicable regulations and our professional expertise in remediation design and construction. Actual work requirements that will be necessary to complete the final closure of the former Exide facility may be determined by future developments and regulatory requirements not specifically identified herein. Conditions encountered during closure and public input may also modify the actual work requirements.



LEGEND

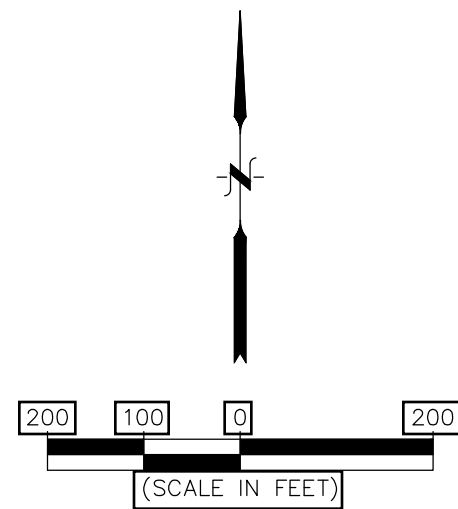
- BOWTIE BOUNDARY
- UNDEVELOPED BUFFER PROPERTY BOUNDARY
- BOWTIE BOUNDARY UNDEVELOPED BUFFER PROPERTY BOUNDARY
- FORMER PATH OF NORTH TRIBUTARY (1951 AERIAL PHOTO) FORMER PATH OF NORTH TRIBUTARY (1972 AERIAL PHOTO) FORMER PATH OF STEWART CREEK (1951 AERIAL PHOTO)
- EXISTING MONITORING WELL SOIL BORING PCLE ZONE/EXCAVATION AREA/LEAD NEGOTIATED ACTION LEVEL = 250 mg/kg PCLE ZONE
- EXCAVATION AREA (LEAD PCL = 275 mg/kg) AREAS THAT WILL BE CAPPED
- PROPOSED SLURRY WALL LOCATIONS PARTIAL RESPONSE ACTION AREA
- PRAA

DRAFT

CONFIDENTIAL

BASE MAP SOURCE:
BASE MAP SOURCE: PASTOR, BEHLING & WHEELER, LLC, GOLDER ASSOCIATES, INC., COOK-JOYCE, INC. AERIAL SOURCE: NORTH CENTRAL TEXAS COUNCIL OF GOVERNMENT (NCTCOG), 2015 TEXAS COUNCIL OF GOVERNMENT (NCTCOG), 2015

NOTE: 1. PCLE ZONE = PROTECTIVE CONCENTRATION LEVEL
CONCENTRATION LEVEL PCLE ZONE =



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**EXIDE FACILITY & ADJACENT PROPERTIES
FRISCO, TEXAS**

**CONCEPTUAL RESPONSE ACTION PLAN
WITH J-PARCEL PRAAs**

JOB NO: 60303.007		
DRAWN BY: KRA		
CHECKED BY: RDV		
DATE: 09-06-2016		
PURPOSE: FOR REVIEW	SHEET NO: 1 OF 1	FIGURE 1