



February 5, 2024

Project No. 20409062

Mack Borchardt

City of Frisco
6101 Frisco Square Boulevard
Frisco, Texas 75034

RE: STATUS OF CAMU ACTIVITIES – ANNUAL REPORT, FRISCO COMMUNITY DEVELOPMENT CORPORATION SITE, 7471 OLD 5TH STREET, FRISCO, TEXAS, AGREED ORDER, DOCKET NO. 2013-2207-IHW-E

Dear Mr. Borchardt,

WSP has prepared this Status of Corrective Action Management Activities – Annual Report (CAMU Annual Report) to fulfill requirements for the Agreed Order Docket No. 2013-2207-IHW-E issued to Exide Technologies by the Texas Commission on Environmental Quality (TCEQ) for the above referenced facility (Site). The Site, previously owned and operated by Exide Technologies, was purchased by the City of Frisco Community Development Corporation (Frisco CDC) on October 26, 2020 and is hereafter referred to as the Frisco CDC Site.

In 2023, the following activities were completed for the CAMU:

- Quarterly groundwater sampling was continued throughout 2023 in accordance with the Revised Class 2 Landfill Groundwater Monitoring Plan. The Second Semiannual Groundwater Monitoring Report for 2022 was submitted on January 25, 2023. The First Semiannual Groundwater Monitoring Report for 2023 was submitted on July 19, 2023.
- On February 13, 2023, a *Response to Conditional Letter of Map Revision*, was submitted to the Federal Emergency Management Agency (FEMA) to address comments provided in a letter dated January 20, 2023 requiring additional information on the Conditional Letter of Map Revision submitted on June 2, 2022.
- On March 3, 2023, WSP provided the Texas Commission on Environmental Quality (TCEQ) with an update letter providing updated Part B Remedial Action Plan (RAP) figures related to the Conditional Letter of Map Revision (CLOMR) submitted on November 16, 2022.
- On April 10, 2023, WSP responded to comments dated April 7, 2023 on the *Conditional Letter of Map Revision*.
- On May 11, 2023 WSP submitted a revised Section I of the RCRA Part B Permit Renewal Application, along with a revised Core Data Form and revised adjacent property owners map.

WSP USA Inc.

1601 S Mopac Expy, Suite 325D
Austin, Texas 78746

T: +1 (737) 703-3900

WSP.com

- On May 11, 2023 the Frisco CDC received Conditional Approval from TCEQ for the Utility Replacement Soil Excavation Interim Action Work Plan dated December 8, 2022.
- On July 10, 2023 WSP submitted a *Former Operating Plant Air Monitoring Plan* to identify the measures to minimize emissions related to the operation and closure activities at the Former Operating Plant and Remediation Consolidation Area.
- A Utility Replacement Soil Excavation Interim Action Status Report was submitted on October 3, 2023 which detailed the soil response actions conducted from July to September 2023. Approximately 7,000 cubic yards of soil was excavated from the sewer line and Affected Property No. 5 on the water line right-of-way. Confirmation sampling was conducted in a grid pattern to confirm that residual contaminants of concern did not exceed critical Protective Contaminant Levels (PCLs). Air monitoring was conducted in accordance with the July 2023 air monitoring plan.
- Excavated soils were stockpiled and characterized as specified in the Waste Analysis Plan (Part B Permit Renewal Application Attachment Q). Approximately 5,900 cubic yards of excavated soil was characterized as Class 2 non-hazardous and was placed for disposal on the Remediation Consolidation Area (RCA). Approximately 250 cubic yards of excavated soil was characterized as Class 1 non-hazardous, was treated on-site, later characterized as Class 2 non-hazardous and was placed for disposal on the RCA. Approximately 850 cubic yards of soil was characterized as hazardous, approximately 100 cubic yards (173,420 pounds) of which contained large fragments of slag and were transported off-site to U.S. Ecology Texas, Inc. in Robstown, Texas for treatment and disposal. The remaining approximately 750 cubic yards of hazardous soils were transferred to roll boxes as 90-day storage containers. Hazardous soils were then treated using procedures approved in the WAP, later characterized as Class 2 non-hazardous and ultimately placed for disposal on the RCA.
- On September 6, 2023 the TCEQ issued the Notice of Application and Preliminary Decision (NAPD) with instructions for the Public Notice.
- The Public Notice was published in the Spanish language web-based publication *Al Dia* on September 27, 2023, in the *Dallas Morning News* on October 2, 2023, in the *Frisco Enterprise* on October 1-2, 2023, with follow up radio broadcast on KDGE-FM on October 7, 2023. The 45-day public notice period ended on November 16, 2023 with no public comment on the RCRA permit application.
- On January 3, 2024 the TCEQ issued Hazardous Waste Permit Renewal 50206, thus approving the Response Action Plan and other related closure plans for the Site.
- At year's end, WSP was in the process of preparing an undated Status Report for the Utility Replacement Soil Excavation Interim Action, for delivery to the TCEQ in Mid-January 2024.

CLOSURE

WSP appreciates the opportunity to assist the Frisco Community Development Corporation with this project. Please contact us if you have any questions or comments concerning this annual operational report.

Sincerely,

WSP USA INC.





Catherine Mear
Environmental Scientist, Consultant



Timothy P. Jennings, PG(TX)
Assistant Vice President, Geologist

CC: Wes Pierson – Frisco City Manager, City of Frisco
 Jason Brodigan – Interim Director of Engineering Services (City of Frisco)
 Jerry Wick – TCEQ Austin
 Erin Gorman – TCEQ Region 4
 Brad Weaver – JEM Connections LLC (City of Frisco)