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

November 19, 2015

Mr. George Purefoy, City Manager City of Frisco 6101 Frisco Square Boulevard, 5th Floor Frisco, Texas, 75034

Re: J Parcel – Stewart Creek Business Park (Undeveloped Buffer Property (UBP) Surrounding Exide Technologies Frisco Recycling Center), 7471 South 5th Street, Frisco, Collin County; Voluntary Cleanup Program (VCP) No. 2541; Customer No. CN600129787; Regulated Entity No. RN106583511

Dear Mr. Purefoy:

The VCP of the Texas Commission on Environmental Quality (TCEQ) has reviewed your Response to TCEQ Comment No. 2 Regarding the Affected Property Assessment Report, dated September 23, 2015. The TCEQ's September 24, 2014 letter requested that two additional quarterly groundwater monitoring events be conducted at well VCP-MW-9 to evaluate an exceedance of arsenic and VCP-MW-10 to evaluate an exceedance of methyl tertiary-butyl ether (MTBE). The TCEQ requested that you provide the results of the two additional quarterly groundwater monitoring events at the end of each sampling event.

The City of Frisco's September 23, 2015 response provided the results of four sampling events conducted in April 2013, January 2014, April 2015 and July 2015. These sampling events indicated that arsenic did not exceed the applicable protective concentration level (PCL) in the last three sampling events in monitoring well VCP-MW-9. The groundwater sampling results from VCP-MW-10 indicate that MTBE exceeded the applicable PCL for groundwater samples collected during two of the four sampling events, but the reported source of the MTBE is from the closed underground storage site (LPST No. 113367) located on the Green Supply Company property located up-gradient of VCP-MW-10. The TCEQ concurs with conclusions of the report, namely, the MTBE contamination in the groundwater is attributable to the closed LPST and is subject to Texas Administrative Code Chapter 334 (PST program). Therefore, some of the exposure assumptions included in the LPST site closure letter will be carried forward into the VCP site certificate of completion as a non-permanent institutional control.

Mr. Purefoy, City Manager Page 2 November 19, 2015 VCP No. 2541

Please call me at (512) 239-2361 if you need additional information or wish to discuss this letter.

Sincerely,

Gary Beyer, Project Manager

VCP-CA Section

Remediation Division

Texas Commission on Environmental Quality

GB/jdm

cc: Mr. Sam Barrett, TCEQ Region 4 Office, Dallas/Ft. Worth

Mr. Matthew A. Love, Director, Global Environmental Remediation, Exide Technologies, 3000 Montrose Avenue, Reading, PA 19605

Mr. Bruce A. Cole, Executive Vice President, Strategy and Business Development, Exide Technologies, P.O. Box 14294, Reading, PA 19612-4294

Mr. James L. Gandy, Frisco Economic Development Corporation, 6801 Gaylord Parkway, Suite 400, Frisco, TX 75034

Mr. Wade Wheatley, Cook-Joyce Inc. 812 West 11th, Austin, TX 78701-2000

Mr. Tim Nichols, PB&W, LLC, 2201 Double Creek Drive, Suite 4004, Round Rock, Texas 78664