

September 2, 2016

Ms. Joanna Manning Texas Commission on Environmental Quality P.O. Box 13087, MC 221 Austin, TX 78711

Reference:

Quarterly Status Report - VCP 2122

City of Frisco

Stewart Creek Waste Water Treatment Plant (SCWWTP)

Off Eagan Way, Frisco, TX Apex Project No. 7020105C035

Dear Ms. Manning:

Apex TITAN, Inc. (Apex) appreciates the opportunity to submit this quarterly status report (QSR) for the site located off Eagan Way, Frisco, Texas (the "Site") for work conducted between March 14, 2016 and June 14, 2016.

On behalf of the City of Frisco, Apex submitted a Plan for a Response to Comments for the APAR/SLERA/RACR – VCP 2122, dated June 17, 2015 (hereinafter the, "Response Plan"). The Response Plan was prepared in response to a comment letter from the Texas Commission on Environmental Quality (TCEQ) Voluntary Cleanup Program (VCP), received December 17, 2013, regarding the combined document consisting of the Affected Property Assessment Report (APAR) and Screening Level Ecological Risk Assessment (SLERA), and the Response Action Completion Report (RACR), both prepared by Pastor, Behling & Wheeler, LLC (PBW).

Comments to the Response Plan were provided by TCEQ in a letter dated September 8, 2015. Based on TCEQ's review, the Response Plan was approved based on actions enumerated in the TCEQ letter.

As detailed in Apex's Quarterly Status Report, dated June 14, 2016, the groundwater to surface water pathway was evaluated for the revised submittals. Exide collected a groundwater sample from monitoring well MW-2 on October 14, 2015 for analysis of total and dissolved cadmium, lead, selenium and silver. Based on the laboratory report shared with the City of Frisco, dissolved cadmium was detected at a concentration that exceeded the Critical Surface Water PCL of 0.000256 mg/L. Installation of monitoring well MW-10 (installed in a downgradient position from MW-2) was conducted to evaluate the cadmium exceedance at the surface water point of exposure and sampled in March and June 2016. Based on the final analytical data shared with the City of Frisco, dissolved cadmium was detected in MW-2 at a concentration that exceeded the Critical Surface Water PCL of 0.000256 mg/L during the March 2016 event; however, the dissolved cadmium concentration reported for the June 2016 groundwater sampling event was below the Critical Surface Water PCL. Dissolved cadmium was not detected above the detection limit in monitoring well MW-10 during the March and June 2016 groundwater sampling events.

The City of Frisco anticipates bringing a plan to remove municipal solid waste (MSW) present in the historic MSW disposal trench in the South Area. The plan will be prepared for approval by the TCEQ MSW permits section and the TCEQ VCP. At this time, the City of Frisco anticipates beginning preparation of the plan in September 2016.

The VCP applicants requested an extension to the submission deadline for the revised APAR and RACR to September 5, 2016. The TCEQ responded on March 16, 2016, with approval of the extension, revising

the due date to September 5, 2016. Considering the City of Frisco's intent to address the MSW present at the Site, the VCP applicants request a 180-day extension to the September 5, 2016 submission deadline, with a revised due date of March 4, 2017. The results of the removal of the MSW will be incorporated into the updated APAR and RACR.

Per your request in a letter dated January 7, 2015, the VCP applicant will continue to submit status reports on a quarterly basis.

If you should have any questions or comments regarding this correspondence, please contact the undersigned at 214-350-5469.

Sincerely,

Apex FITAM, Inc.

Rusty Simpson, P.G., C.P.G. Principal

Cc: Mr. Brent Wade, TCEQ

Mr. Gary Hartwell, P.E., City of Frisco

Mr. Henry Hill, City of Frisco

Mr. Mack Borchardt, City of Frisco

Mr. Kerry Russell, Russell & Rodriguez, L.L.P.

Mr. Wade Wheatley, GDS Associates, Inc.

Mr. Brad Weaver, Exide

Mr. Eric Pastor, PBW

