

General TCEQ Response:

TCEQ appreciates all the feedback it has received regarding the Hillcrest Community Environmental Investigation (HCEI) Field Sampling Plan (FSP). TCEQ has considered all comments received as of March 25, 2010. Please find TCEQ’s response to public input received on March 25, 2010. TCEQ Responses to public input received prior to March 25, 2010 are available under “TCEQ Responses to Public Input Received Prior to March 25, 2010. Please note the revised HCEI Proposed Soil Gas Sampling Locations. The revised map has the extra sampling locations as requested during the March 25, 2010 meeting.

1) Public Input:

Could additional samples be located in areas outside of the Hillcrest subdivision where groundwater is known to be affected so as to serve as positive controls for the screening sampling event?

TCEQ Response

Yes, additional sample locations have been selected in areas of known groundwater contamination as suggested. Specifically, sample locations were selected in the area south of Flint Hills and north of I-37 as well as the former tank farm east of the Hillcrest community (see revised Phase I Sampling Locations Map).

2) Public Input:

Should precipitation be considered as a factor in implementing Phase I?

TCEQ Response

TCEQ consulted with the selected laboratory, Beacon Environmental Services, widely recognized as a leader in the field of soil-gas sampling and analysis. They informed that precipitation is only an issue in very rapidly recharging water bearing units with recent contamination where the new precipitation would form a lens over the groundwater. This is less of a factor where the groundwater contamination has existed for a significant period of time as the vapors are already in the soils above the groundwater. Beacon explained that they can in fact see higher masses of vapors recovered after rain events since the percolating precipitation and rising groundwater displaces the vapors and causes them to rise towards the surface. Despite there being no definite approach to account for precipitation in this screening method, TCEQ consulted the Climatic Atlas. The month of April is not seasonally or historically among the high precipitation months for Corpus Christi. TCEQ has evaluated the factors related to precipitation for soil-gas sampling and proposes that Phase I can be implemented in April-May 2010 without significant bias arising from precipitation.

Corpus Christi Monthly Precipitation*

<u>Month</u>	<u>Average Monthly Precipitation (inches)</u>
January	1.5

February	1.5
March	0.75
April	1.5
May	3
June	3
July	2
August	3.5
September	6
October	3
November	1.5
December	1.5

* Source: Texas Department of Water Resources, Climatic Atlas of Texas, December 1983.