



January 14, 2025

Ms. Tiffany De Leon, P.G.  
Project Manager  
VCP-CA Division  
Texas Commission on Environmental Quality  
MC-221  
12100 Park 35 Circle  
Austin, Texas 78753

**Re:** Response to TCEQ Technical Notice of Deficiency (NOD) 1 – Compliance Plan, dated December 20, 2024  
KM Liquids Terminals, LLC (KMLT) – Galena Park;  
906 Clinton Drive, Galena Park, Harris County  
TCEQ SWR No. 30573; CN601545940; RN100237452  
TCEQ Hazardous Waste Permit/Compliance Plan No. 50054  
EPA ID No. TXD026481523

Dear Ms. De Leon:

KM Liquids Terminals, LLC (KMLT) is providing this response to the Texas Commission on Environmental Quality's (TCEQ's) Technical NOD – Compliance Plan to the RCRA facility permit for the referenced facility sent via email on December 20, 2024. Each response is referenced to the corresponding assigned TCEQ compliance plan technical (CP) deficiency. As requested by the TCEQ, both an unmarked and marked copy (if applicable) of revised response documents are being submitted as part of this response.

**Technical Deficiency CP1, Part B, Section XI, Application text, CP Tables, CP A Attachment Sheets, and Financial Assurance Tables; Error Type: Incomplete** - The TCEQ has not approved the following two documents, which were submitted along with the permit renewal:

- A. The Response Action Plan (RAP) Addendum dated June 28, 2024 that includes a request to add the North Plant plume management zone (PMZ) as an area of concern (AOC), and
- B. The Response Action Completion Report (RACR) dated June 4, 2024 that requests removal of "Old Pump House No. 5" as an AOC

Please note additional changes to the referenced locations may be needed once the TCEQ's comments have been addressed and approved.

*Response to CPI:* Noted. KMLT understands the above referenced reports have not been approved by the TCEQ. KMLT will make additional changes if required.

**Technical Deficiency CP2, Part B, Section XI, CP Tables; Error Type: Format and Inconsistent** - The unit names provided on the CP Tables are inconsistent with the unit names listed on CP Table I. Please revise the unit names on each CP Table to be consistent with the unit names provided in CP Table I.

*Response to CP2:* The CP Tables have been updated to be consistent with CP Table I.

**Technical Deficiency CP3, Part B, Section XI.B, CP Table II; Error Type: Incomplete** - Update Column “Date Program Requirement and Remedy Standard Completed” for all units. If corrective action is ongoing for a unit, please include this information in the column.

*Response to CP3:* This CP Table II column has been updated to denote ongoing corrective action for applicable units. As discussed during the January 3, 2025 call with the TCEQ, if ongoing remedy is still ongoing for all/multiple units for a unit number, it was only listed once in this column.

**Technical Deficiency CP4, Part B, Section XI.A, CP Tables IX; Error Type: Omitted** - Please provide CP Table IX: Description of Uppermost Aquifer.

*Response to CP4:* CP Table IX has been completed and is included in this response for review.

**Technical Deficiency CP5, Part B, Section XI, CP Tables III and IIIa; Error Type: Incomplete and Omitted**

- A. The “Southeast Holding Basin” GWPS in Columns B and C have been changed from <sup>GW</sup>GW<sub>Ing</sub> to <sup>SW</sup>GW PCLs in both Tables III and IIIA. The provided calculations in Attachment Z must be reviewed and approved before updating the CP Tables. Change the GWPS to the <sup>GW</sup>GW<sub>Ing</sub> PCLs approved in the 2019 Permit. Please submit a RAP addendum which includes the request, a reason for the request, and the methodology used to calculate the <sup>SW</sup>GW PCLs. This change to the PCLs will require a separate permit modification.
- B. Remove the AALs and AMP wells from CP Tables III and IIIA. These are included for the “Central Plant PMZ” and the “North Plant PMZ”
- C. Include daughter products for each unit.

*Response to CP5:*

- a) As documented in the 2007 Central Plant RAP, the Southeast Holding Basin (SEHB) is part of SWMU Group C2 and within the plume management zone (PMZ) for Central Plant. Since the SEHB is part of SWMU Group 2, the <sup>SW</sup>GW PCL calculations completed in the approved 2007 RAP are applicable for the hazardous constituents in the permit for both the Central Plant and SEHB. The SEHB has additional hazardous constituents in CP Tables III and IIIA that are not in the Central Plant WMA PMZ and <sup>SW</sup>GW PCLs were calculated for these hazardous constituents that are only applicable to the SEHB, which were presented in Attachment Z of the permit application. As discussed during the

January 3, 2025 call with the TCEQ, KMLT intends to submit an abridged RAP Addendum for Central Plant to focus solely on the request, reason for request and methodology to calculate the <sup>SW</sup>GW PCLs for hazardous constituents in the permit (CP Tables III and IIIA) for SEHB that are not part of the Central Plant WMA PMZ. It was also agreed upon during the call that the current <sup>SW</sup>GW GWPS could remain in CP Tables III and IIIA at this time and could be revised as needed pending the review/approval of the RAP Addendum.

- b) The AALs and AMP wells have been removed from CP Table III and CP Table IIIA. These updated tables have been included in this response for review.
- c) CP Table III and CP Table IIIA have been reviewed and KMLT believes applicable daughter products are currently included in the hazardous constituents list.

**Technical Deficiency CP6, Part B, Section XI.C, Attachment C, Attachment Y; Error Type: Incomplete and Format** - The Sampling and Analysis Plan does not include measurements of well depths, well siltation, presence/absence of non-aqueous phased liquids (NAPLs), and the NAPL thickness for each well. Please revise the Sampling and Analysis Plan (SAP) in accordance with the requirements detailed in the Part B, Section XI, Attachment C instructions.

*Response to CP6:* An example field table that is utilized during monitoring events (and will be included with the SAP) has been included in this response for review.

**Technical Deficiency CP7, Part B, Section XI.C and XI.D, CP Table VII; Error Type: Omitted** - Please provide CP Table VII: Reporting Requirements.

*Response to CP7:* CP Table VII has been included in this response for review.

**Technical Deficiency CP8, Part B, Section XI.C and XI.D, CP Table VIII; Error Type: Typo and Incomplete** -

- A. Add a space between “within” and “30”.
- B. CP Table VIII is missing a number of applicable items. Please see the attached copy of the CP Table VIII template and fill out the template and list each item that is applicable to the site.

*Response to CP8:*

- a) A space has been added between “within” and “30”.
- b) CP Table VIII has been updated and is included in this response for review.

**Technical Deficiency CP9, Part B, Section XI.E, CP Table XI.E.2.e and Table XI.E.3; Error Type: Incomplete** -

- A. Please revise unit names so that they are consistent with CP Table I (see CP2 above).

- B. The total values calculated on Table XI.E.2 are not consistent with the values listed. Please revise Table XI.E.2 as necessary.
- C. The number of wells provided were not consistent with the number of wells listed in CP Table V. Please revise the values as necessary.

*Response to CP9:*

- a) Table XI.E.2.e and Table XI.E.3 have been updated to be consistent with CP Table I, and the updated tables are included for reference.
- b) Table XI.E.2.e has been updated and has been included in this response for review.
- c) Table XI.E.2.e and Table XI.E.3 have been updated to be consistent with CP Table V, and the updated tables are included for reference.

If you have any questions regarding this submittal or require additional information, please feel free to contact me at (713) 654-6035, or if you wish you can e-mail me at

[REDACTED]

Sincerely,  
***KM Liquids Terminals LLC***



Johnny Kennedy  
Remediation Manager

Attachments

**NOD ID CP2/CP3/CP5**

**CP Tables I through VI**

**CP Table I: Waste Management Units and Areas Subject to Groundwater  
Corrective Action and Compliance Monitoring**

**A. Corrective Action<sup>1</sup> (30 TAC §335.166)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Surface Impoundment	1.CAMU/North Holding Basin	004	Ongoing Monitoring
Subsurface Impoundment	2.Southeast Holding Basin	017	Ongoing Monitoring

**B. Compliance Monitoring<sup>1</sup> (30 TAC §335.165)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

**C. Corrective Action<sup>2</sup> (30 TAC §335.167)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
SWMU	1. Texmark Chemical Inc. (TCI) Group	N/A	Ongoing Monitoring
SWMU	2. Central Plant WMA PMZ	N/A	Ongoing Monitoring
SWMU	3. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC)	N/A	Ongoing Monitoring
AOC	4. North Plant PMZ AOC	N/A	Ongoing Monitoring

**D. Alternative Corrective Actions<sup>3</sup> (30 TAC §335.151)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

**E. Facility Operations Area (FOA)<sup>4</sup> (30 TAC §335.156 and Chapter 350)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

[Note: Enter "Reserved" if a specific program (referenced in CP Table I.A., I.B., I.C., I.D., and/or I.E.) is not applicable. More than one program may apply to a facility. Also, include a CD disk with the application that provides an electronic copy of the applicable files supporting CP TABLES I-VI in MS Word format.]

Foot Notes:

1 Program applies to RCRA-regulated units only.

2 Program applies to releases from solid waste management units (SWMUs) and/or areas of concern (AOCs).

3 Program applies to commingled releases from RCRA-regulated unit and from one or more SWMUs and/or AOCs.

4 List SWMUs, additional units/areas of Investigation, AOCs, RCRA-regulated units within the FOA that are subject to corrective action. For RCRA units, SWMUs and/ or AOC outside the FOA boundary for which compliance monitoring and/ or corrective action applies should be listed separately in Items A, B or C as appropriate.

5 Specify the date of Commissions No Further Action approval letter for program requirement and remedy standard completed for all media of concern. [Note: for the purpose of maintaining a historical record, the permittee shall update CP Table I to reflect the new status of the unit / area to include the remedy standard achieved for all media of concern and the date of the Commissions No Further Action approval letter. The units/area shall not be deleted from this table even though the program objectives have been completed and no further action has been approved. Put "N/A" in this column if not applicable.]

**CP Table II: Solid Waste Management Units and/or Areas of Concern for which Corrective Action applies  
pursuant to 30 TAC 335.167**

Unit Number <sup>1</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	SWMU or AOC	Media Affected <sup>2</sup>	Date Program Requirement and Remedy Standard Completed <sup>3</sup>
1.	<u>Central Plant WMA PMZ:</u> SWMU Group C1: Belowground OWS Tank 117 Tank 50 Tank 51 Tank 116 Tank 29 SWMU Group C2: Southeast Holding Basin SEHB Sump Tank 26 Tank 82 Lift Station #4 T/TR Storm Water Drainage SWMU Group C3: Tank 3-9 Tank 32 Aboveground OWS SWMU Group C4: Drum Storage Area Impoundment #1 Tank 25-1	 015 010 007 008 009 002  017 None None None None None  013 012 014  001 None 011	SWMU	Soil and GW	Ongoing remedy for affected soil and groundwater
2.	<u>East Plant Waste Management Area:</u> Texaco Landfill #3 Impoundment #3	 None None	SWMU	Soil and GW (except Texaco Landfill #3)	Texaco Landfill #3 - Approved No Release 12/8/00 Impoundment #3 – Approved NFA 4/11/2013



8.	Old Pump House No. 5 AOC	None	AOC	Soil and GW	Approved NFA – Pending
9.	Gate 6 AOC	None	AOC	Soil and GW	Approved NFA 12/16/2022
10.	North Plant PMZ AOC	None	AOC	Soil and GW	Ongoing remedy for affected soil and groundwater

Foot Notes:

SWMU ‘ Solid Waste Management Unit

AOC ‘ Area of Concern

1 For sites with FOA Authorization, list SWMUs and/or AOCs that were not included in the FOA, and are subject to corrective action.

2 Specify affected media groundwater, soils, etc.

3 Specify the date of Commissions No Further Action approval letter for program requirement and remedy standard completed for all media of concern.

**CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
1. CAMU/North Holding Basin (Zones III and IV)	1,2 Dichloroethane	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Barium	2.000 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Lead	0.015 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Mercury	0.002 <sup>GW</sup> GW <sub>Ing</sub>	NA
2. Southeast Holding Basin (Sandy Channel Fill and Uppermost Natural Transmissive Unit)	1,1 Dichloroethene	2,500 <sup>SW</sup> GW	2,500 <sup>SW</sup> GW
	1,2,3 Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	1,2 Dichloroethane	30,450 <sup>SW</sup> GW	30,450 <sup>SW</sup> GW
	1,2 Dichloropropane	25,300 <sup>SW</sup> GW	25,300 <sup>SW</sup> GW
	2,4,6 Trichlorophenol	2,300 <sup>SW</sup> GW	2,300 <sup>SW</sup> GW
	2,4-D (Dichlorophenoxyacetic Acid)	212,500 <sup>SW</sup> GW	212,500 <sup>SW</sup> GW
	2,4 Dichlorophenol	21,400 <sup>SW</sup> GW	21,400 <sup>SW</sup> GW
	2,4 Dimethylphenol	5,500 <sup>SW</sup> GW	5,500 <sup>SW</sup> GW
	2 – Hexane	13 <sup>SW</sup> GW	13 <sup>SW</sup> GW
	2 – Methyl-naphthalene	500 <sup>SW</sup> GW	500 <sup>SW</sup> GW
	2 – Methylphenol (o-Cresol)	98,706 <sup>SW</sup> GW	98,706 <sup>SW</sup> GW
	4 – Bromophenyl Phenyl Ether	167,298 <sup>SW</sup> GW	167,298 <sup>SW</sup> GW
	4 – Methylphenol (p-Cresol)	28,106 <sup>SW</sup> GW	28,106 <sup>SW</sup> GW
	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Acenaphthylene	150 <sup>SW</sup> GW	150 <sup>SW</sup> GW
	Acetone	2,200 <sup>SW</sup> GW	2,200 <sup>SW</sup> GW
	Aniline (Phenylamine, Aminobenzene)	840 <sup>SW</sup> GW	840 <sup>SW</sup> GW
	Anthracene	3.0 <sup>SW</sup> GW	3.0 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Benzo (a) Anthracene	10.10 <sup>SW</sup> GW	10.10 <sup>SW</sup> GW
	Benzo (a) Pyrene	0.80 <sup>SW</sup> GW	0.80 <sup>SW</sup> GW
	Benzo (b) Fluoranthene	1.1 <sup>SW</sup> GW	1.1 <sup>SW</sup> GW
	Benzo (g,h,i) Perylene	1,000 <sup>SW</sup> GW	1,000 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Benzo (k) Fluoranthene	10.80 <sup>SW</sup> GW	10.80 <sup>SW</sup> GW
	Benzyl Alcohol	40,000 <sup>SW</sup> GW	40,000 <sup>SW</sup> GW
	Benzyl Butyl Phthalate	7,780 <sup>SW</sup> GW	7,780 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	bis (2-ethylhexyl) phthalate	632 <sup>SW</sup> GW	632 <sup>SW</sup> GW
	Carbon Disulfide	2,000 <sup>SW</sup> GW	2,000 <sup>SW</sup> GW
	Chlorobenzene	8,780 <sup>SW</sup> GW	8,780 <sup>SW</sup> GW
	Chloroform	8,000 <sup>SW</sup> GW	8,000 <sup>SW</sup> GW
	Chrysene	850 <sup>SW</sup> GW	850 <sup>SW</sup> GW
	Dibenz (a,h) Anthracene	0.11 <sup>SW</sup> GW	0.11 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	Di-n-Butyl Phthalate	4,100 <sup>SW</sup> GW	4,100 <sup>SW</sup> GW
	Di-n-Octyl Phthalate	160 <sup>SW</sup> GW	160 <sup>SW</sup> GW
	Ethylbenzene	20,800 <sup>SW</sup> GW	20,800 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,1380 <sup>SW</sup> GW
	Indeno (1,2,3 – c,d) Pyrene	1.09 <sup>SW</sup> GW	1.09 <sup>SW</sup> GW
	Lead	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	Methyl Ethyl Ketone (2-butanone)	290,000 <sup>SW</sup> GW	290,000 <sup>SW</sup> GW
	Methyl Iso-Butyl Ketone	19,100 <sup>SW</sup> GW	19,100 <sup>SW</sup> GW
	Methylene Chloride	13,000 <sup>SW</sup> GW	13,000 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Phenol	230,000 <sup>SW</sup> GW	230,000 <sup>SW</sup> GW
	Pyrene	20.08 <sup>SW</sup> GW	20.08 <sup>SW</sup> GW
	Pyridine	79,200 <sup>SW</sup> GW	79,200 <sup>SW</sup> GW
	Styrene	38,000 <sup>SW</sup> GW	38,000 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Toluene	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trans -1,2 – Dichloroethylene	93,700 <sup>SW</sup> GW	93,700 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	Vinyl Acetate	20,000 <sup>SW</sup> GW	20,000 <sup>SW</sup> GW
	Vinyl Chloride	23,100 <sup>SW</sup> GW	23,100 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Xylenes (total)	71,100 <sup>SW</sup> GW	71,100 <sup>SW</sup> GW
3. Texmark Chemical Inc. (TCI) Group	Arsenic	0.010 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Benzene	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Ethylbenzene	1.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Styrene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Toluene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Xylenes (total)	10.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	56,900 <sup>SW</sup> GW	56,900 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,180 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Pyrene	20.1 <sup>SW</sup> GW	20.1 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	1,2,3-Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	Vinyl Chloride	435 <sup>Air</sup> GW <sub>Inh-V</sub>	434 <sup>Air</sup> GW <sub>Inh-V</sub>
5. Central Plant WMA PMZ (West Migration Pathway)	Benzene	0.005 <sup>GW</sup> GW <sub>Ing</sub>	0.005 <sup>GW</sup> GW <sub>Ing</sub>
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC	Benzene	1,470 <sup>SW</sup> GW	1,470 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	110 <sup>SW</sup> GW	110 <sup>SW</sup> GW
	Chlorobenzene	2,190 <sup>SW</sup> GW	2,190 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	14,200 <sup>SW</sup> GW	14,200 <sup>SW</sup> GW
	1,2-Dichloroethane	1,030 <sup>SW</sup> GW	1,030 <sup>SW</sup> GW
	Ethylbenzene	5,180 <sup>SW</sup> GW	5,180 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	4,470 <sup>SW</sup> GW	4,470 <sup>SW</sup> GW
	Trichloroethylene	8,490 <sup>SW</sup> GW	8,490 <sup>SW</sup> GW
	Vinyl Chloride	435 <sup>Air</sup> GW <sub>Inh-V</sub>	435 <sup>Air</sup> GW <sub>Inh-V</sub>

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Xylenes (total)	17,700 <sup>SWG</sup>	17,700 <sup>SWG</sup>
7. North Plant PMZ AOC	MTBE	0.24 <sup>GWIng</sup>	0.24 <sup>GWIng</sup>

**Note:** WMA=Waste Management Unit, PMZ=Plume Management Zone

Foot Note:

**GWGWIng** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.. In accordance with §350.72(b), GWGWIng, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to  $1 \times 10^{-4}$ ) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

**AirGWInh-V** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**SWG** ACL pursuant to 30 TAC §335.160(b) based upon the Protective PCL determined under RSA or RSB for Groundwater- to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**AAL** ACL derived pursuant to 30 TAC §335.160(b) based upon the Protective Concentration level (PCL) established as an Attenuation Action Level as defined in 30 TAC §350(a)(4).

**CP Table IIIA: Corrective Action Program Table of Indicator Parameters and Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
1. CAMU/North Holding Basin (Zones III and IV)	1,2 Dichloroethane	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
2. Southeast Holding Basin (Sandy Channel Fill and Uppermost Natural Transmissive Unit)	1,1 Dichloroethene	2,500 <sup>SW</sup> GW	2,500 <sup>SW</sup> GW
	1,2,3 Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	1,2 Dichloroethane	30,450 <sup>SW</sup> GW	30,450 <sup>SW</sup> GW
	1,2 Dichloropropane	25,300 <sup>SW</sup> GW	25,300 <sup>SW</sup> GW
	2,4,6 Trichlorophenol	2,300 <sup>SW</sup> GW	2,300 <sup>SW</sup> GW
	2,4-D (Dichlorophenoxyacetic Acid)	212,500 <sup>SW</sup> GW	212,500 <sup>SW</sup> GW
	2,4 Dichlorophenol	21,400 <sup>SW</sup> GW	21,400 <sup>SW</sup> GW
	2,4 Dimethylphenol	5,500 <sup>SW</sup> GW	5,500 <sup>SW</sup> GW
	2 – Hexane	13 <sup>SW</sup> GW	13 <sup>SW</sup> GW
	2 – Methylnapthalene	500 <sup>SW</sup> GW	500 <sup>SW</sup> GW
	2 – Methylphenol (o-Cresol)	98,706 <sup>SW</sup> GW	98,706 <sup>SW</sup> GW
	4 – Bromophenyl Phenyl Ether	167,298 <sup>SW</sup> GW	167,298 <sup>SW</sup> GW
	4 – MethylPhenol (p-Cresol)	28,106 <sup>SW</sup> GW	28,106 <sup>SW</sup> GW
	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Acenaphthylene	150 <sup>SW</sup> GW	150 <sup>SW</sup> GW
	Acetone	2,200 <sup>SW</sup> GW	2,200 <sup>SW</sup> GW
	Aniline (Phenylamine, Aminobenzene)	840 <sup>SW</sup> GW	840 <sup>SW</sup> GW
	Anthracene	3.0 <sup>SW</sup> GW	3.0 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Benzo (a) Anthracene	10.10 <sup>SW</sup> GW	10.10 <sup>SW</sup> GW
	Benzo (a) Pyrene	0.80 <sup>SW</sup> GW	0.80 <sup>SW</sup> GW
	Benzo (b) Fluoranthene	1.1 <sup>SW</sup> GW	1.1 <sup>SW</sup> GW
	Benzo (g,h,i) Perylene	1,000 <sup>SW</sup> GW	1,000 <sup>SW</sup> GW
	Benzo (k) Fluoranthene	10.80 <sup>SW</sup> GW	10.80 <sup>SW</sup> GW
	Benzyl Alcohol	40,000 <sup>SW</sup> GW	40,000 <sup>SW</sup> GW
	Benzyl Butyl Phthalate	7,780 <sup>SW</sup> GW	7,780 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	bis (2-ethylhexyl) phthalate	632 <sup>SW</sup> GW	632 <sup>SW</sup> GW
	Carbon Disulfide	2,000 <sup>SW</sup> GW	2,000 <sup>SW</sup> GW
	Chlorobenzene	8,780 <sup>SW</sup> GW	8,780 <sup>SW</sup> GW
	Chloroform	8,000 <sup>SW</sup> GW	8,000 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Chrysene	850 <sup>SW</sup> GW	850 <sup>SW</sup> GW
	Dibenz (a,h) Anthracene	0.11 <sup>SW</sup> GW	0.11 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	Di-n-Butyl Phthalate	4,100 <sup>SW</sup> GW	4,100 <sup>SW</sup> GW
	Di-n-Octyl Phthalate	160 <sup>SW</sup> GW	160 <sup>SW</sup> GW
	Ethylbenzene	20,800 <sup>SW</sup> GW	20,800 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,1380 <sup>SW</sup> GW
	Indeno (1,2,3 – c,d) Pyrene	1.09 <sup>SW</sup> GW	1.09 <sup>SW</sup> GW
	Lead	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	Methyl Ethyl Ketone (2-butanone)	290,000 <sup>SW</sup> GW	290,000 <sup>SW</sup> GW
	Methyl Iso-Butyl Ketone	19,100 <sup>SW</sup> GW	19,100 <sup>SW</sup> GW
	Methylene Chloride	13,000 <sup>SW</sup> GW	13,000 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Phenol	230,000 <sup>SW</sup> GW	230,000 <sup>SW</sup> GW
	Pyrene	20.08 <sup>SW</sup> GW	20.08 <sup>SW</sup> GW
	Pyridine	79,200 <sup>SW</sup> GW	79,200 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Styrene	38,000 <sup>SW</sup> GW	38,000 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Toluene	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trans -1,2 –Dichloroethylene	93,700 <sup>SW</sup> GW	93,700 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	Vinyl Acetate	20,000 <sup>SW</sup> GW	20,000 <sup>SW</sup> GW
	Vinyl Chloride	23,100 <sup>SW</sup> GW	23,100 <sup>SW</sup> GW
	Xylenes (total)	71,100 <sup>SW</sup> GW	71,100 <sup>SW</sup> GW
3. Texmark Chemical Inc. (TCI) Group	Arsenic	0.010 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Benzene	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Ethylbenzene	1.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Styrene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Toluene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Xylenes (total)	10.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	56,900 <sup>SW</sup> GW	56,900 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Fluoranthene	248 <sub>SWGW</sub>	248 <sub>SWGW</sub>
	Fluorene	4,138 <sub>SWGW</sub>	4,180 <sub>SWGW</sub>
	Naphthalene	10,500 <sub>SWGW</sub>	10,500 <sub>SWGW</sub>
	Phenanthrene	385 <sub>SWGW</sub>	385 <sub>SWGW</sub>
	Pyrene	20.1 <sub>SWGW</sub>	20.1 <sub>SWGW</sub>
	Tetrachloroethylene (PCE)	18,000 <sub>SWGW</sub>	18,000 <sub>SWGW</sub>
	Trichloroethylene	34,100 <sub>SWGW</sub>	34,100 <sub>SWGW</sub>
	1,2,3-Trichloropropane	125 <sub>SWGW</sub>	125 <sub>SWGW</sub>
	Vinyl Chloride	435 <sub>AirGW<sub>Inh-V</sub></sub>	434 <sub>AirGW<sub>Inh-V</sub></sub>
5. Central Plant WMA PMZ (West Migration Pathway)	Benzene	0.005 <sub>GWGW<sub>Ing</sub></sub>	0.005 <sub>GWGW<sub>Ing</sub></sub>
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC	Benzene	1,470 <sub>SWGW</sub>	1,470 <sub>SWGW</sub>
	bis (2-Chloroethyl) Ether	110 <sub>SWGW</sub>	110 <sub>SWGW</sub>
	Chlorobenzene	2,190 <sub>SWGW</sub>	2,190 <sub>SWGW</sub>
	cis-1,2-Dichloroethene	14,200 <sub>SWGW</sub>	14,200 <sub>SWGW</sub>
	1,2-Dichloroethane	1,030 <sub>SWGW</sub>	1,030 <sub>SWGW</sub>
	Ethylbenzene	5,180 <sub>SWGW</sub>	5,180 <sub>SWGW</sub>
	Tetrachloroethylene (PCE)	4,470 <sub>SWGW</sub>	4,470 <sub>SWGW</sub>

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Trichloroethylene	8,490 <sup>SWG</sup> W	8,490 <sup>SWG</sup> W
	Vinyl Chloride	435 <sup>AirGW<sub>Inh-V</sub></sup>	435 <sup>AirGW<sub>Inh-V</sub></sup>
	Xylenes (total)	17,700 <sup>SWG</sup> W	17,700 <sup>SWG</sup> W
7. North Plant PMZ AOC	MTBE	0.24 <sup>GWGW<sub>Ing</sub></sup>	0.24 <sup>GWGW<sub>Ing</sub></sup>

**Note:** WMA=Waste Management Unit, PMZ=Plume Management Zone

**Foot Note:**

**GWGW<sub>Ing</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.. In accordance with §350.72(b), GWGW<sub>Ing</sub>, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10<sup>-4</sup>) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

**AirGW<sub>Inh-V</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**SWG**W ACL pursuant to 30 TAC §335.160(b) based upon the Protective PCL determined under RSA or RSB for Groundwater- to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**AAL** ACL derived pursuant to 30 TAC §335.160(b) based upon the Protective Concentration level (PCL) established as an Attenuation Action Level as defined in 30 TAC §350(a)(4).

**CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Concentration Limits (mg/l)
Reserved		

[**Note:** This Table should provide the long list of hazardous constituents that are reasonably expected to be in or derived from waste placed in the units, and may not necessarily be detected and that are to be monitored annually to determine if any new constituents need to be added to CP Table IVA. Also, instead of listing individual constituents of concern (COCs), Appendix IX can be referenced in this table. If Appendix IX list and associated Practical Quantitation Limit (PQL) or Method Quantitation Limit (MQLs) are being required instead of listing individual COCs, add this sentence: The Permittee may petition the Executive Director for deletion of specific parameters from Appendix IX analysis if the Permittee can demonstrate that the constituents were never used in the facility's operation or were never disposed in the waste management area.]

Foot Note:

In the Footnote use one of the following Quantitation Limit designations as the concentration limit if RRR or TRRP apply

**\* For RRR use the following designation, or\***

ND Non-detectable at PQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. PQL is indicated in parentheses. PQL is the lowest concentrations of analytes in groundwaters that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating condition.

BKG Background as determined in accordance with 30 TAC 350.4(a)(6).

**\* Use the following designation if TRRP applies:\***

ND Non-detectable at MQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC §350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

BKG Background as determined in accordance with 30 TAC 350.4(a)(6).

**CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and the Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standard (mg/l)
Reserved		

\* [ Note: This Table should provide a list of all hazardous constituents detected above the Quantitation Limits specified in CP Table IV – Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Practical Quantitation Limits or Method Quantitation Limits for Compliance Monitoring. CP Table IVA constituents are to be monitored semiannually to verify achievement of the GWPS. ]

Foot Note:

Use the following GWPS footnote designations if Risk Reduction Rules (RRR) or Texas Risk Reduction Program (TRRP) apply:

**\* For RRR use the following designation, or\***

MSC ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Medium-Specific Concentration, Residential {...or Industrial...} Risk Reduction Standard No. 2 {...or No. 3} specified in 30 TAC §335 Subchapter S.

MCL ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Maximum Contaminant Level specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subparts B and G.

SMCL ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Secondary Maximum Contaminant Level specified in 40 CFR Part 143, National Secondary Drinking Water Regulations.

AL ACL pursuant to 30 TAC §335.160(b) based upon the Action Level specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subpart I.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at PQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. PQL is indicated in parentheses. PQL is the lowest concentrations of analytes in groundwaters that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating condition.

**\* Use the following designation if TRRP applies:\***

GWGWIng ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with §350.72(b), GWGWIng, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to  $1 \times 10^{-4}$ ) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

GWGWClass3 ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) Tier I for Class 3 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

AirGWInh-V ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

SWGWL ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater-to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

SEDGW ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater-to-sediment PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

ECOGW ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater- based on ecological receptor(s) PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at MQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC §350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

### **CP Table V: Designation of Wells**

#### **Point of Compliance Wells:**

1. CAMU/North Holding Basin  
Zone III – MW-7 and RW-16  
Zone IV – MW-6 and RW-17
2. Southeast Holding Basin  
Sandy Channel Fill (SCF) and Uppermost Natural Transmissive Unit (UNTU) – MW-2R, MW-3R  
Uppermost Natural Transmissive Unit (UNTU) – MW-4R
3. Texmark Chemical Inc. (TCI) Group  
MW-18TCI, MW-19TCI, RW-3, and RW-5
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC)  
None
7. North Plant PMZ AOC  
None

#### **Point of Exposure Wells:**

1. CAMU/North Holding Basin  
None
2. Southeast Holding Basin  
Sandy Channel Fill (SCR) and Uppermost Natural Transmissive Unit (UNTU) – MW-5, MW-13, and MW-33
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
RI-1-17 and RI-1-18
5. Central Plant WMA PMZ (West Migration Pathway)  
POE-1, POE-2, RI-1-14, RI-3-02, and RI-3-03
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC)  
P-2, MW-18, MW-25, MW-26, and MW-28

7. North Plant PMZ AOC  
MW-15, MW-16, and MW-18

Alternate Point of Exposure Wells:

1. CAMU/Former North Holding Basin  
None
2. Southeast Holding Basin  
None
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC)  
None
7. North Plant PMZ AOC  
None

Background Wells:

1. CAMU/Former North Holding Basin  
Zone III – MW-1, MW-8
2. Southeast Holding Basin  
None
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. West Plant WMA PMZ (SWMU Group W3)/West Chemical AOC)  
None
7. North Plant PMZ AOC  
MW-11, MW-13A

**Note:** Wells that are not listed in this table are subject to change, upon approval by the Executive Director, without modification to the Compliance Plan.

**CP Table VI: Compliance Period for RCRA-Regulated Units**

CAMU/North Holding Basin	Year or Number of Years
Year Waste Management Activities Initiated	1975
Year Closed	Active CAMU
Compliance Period	NA*
Compliance Period Began	1992

\*Compliance Period will be evaluated upon closure of the Corrective Action Management Unit (CAMU).

Southeast Holding Basin	Year or Number of Years
Year Waste Management Activities Initiated	1974
Year Closed	1985
Compliance Period	11 Years
Compliance Period Began	1994

**CP Table I: Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring**

**A. Corrective Action<sup>1</sup> (30 TAC §335.166)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Surface Impoundment	1.CAMU/ <del>(North Holding Basin)</del>	004	Ongoing Monitoring
Subsurface Impoundment	2.Southeast Holding Basin	017	Ongoing Monitoring

**B. Compliance Monitoring<sup>1</sup> (30 TAC §335.165)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

**C. Corrective Action<sup>2</sup> (30 TAC §335.167)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
SWMU	1. Texmark Chemical <del>Inc.</del> (TCI) Group	N/A	Ongoing Monitoring
SWMU	2. Central Plant WMA <del>—</del> PMZ	N/A	Ongoing Monitoring
SWMU	3. <del>West Plant WMA PMZ</del> (SWMU Group W3 <del>(West Plant WMA PMZ)</del> )/West Chemical AOC <del>]</del>	N/A	Ongoing Monitoring
AOC	4. North Plant PMZ AOC	N/A	Ongoing Monitoring

**D. Alternative Corrective Actions<sup>3</sup> (30 TAC §335.151)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

**E. Facility Operations Area (FOA)<sup>4</sup> (30 TAC §335.156 and Chapter 350)**

Unit Type <sup>5</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>5</sup>
Reserved			

[Note: Enter "Reserved" if a specific program (referenced in CP Table I.A., I.B., I.C., I.D., and/or I.E.) is not applicable. More than one program may apply to a facility. Also, include a CD disk with the application that provides an electronic copy of the applicable files supporting CP TABLES I-VI in MS Word format.]

Foot Notes:

1 Program applies to RCRA-regulated units only.

2 Program applies to releases from solid waste management units (SWMUs) and/or areas of concern (AOCs).

3 Program applies to commingled releases from RCRA-regulated unit and from one or more SWMUs and/or AOCs.

4 List SWMUs, additional units/areas of Investigation, AOCs, RCRA-regulated units within the FOA that are subject to corrective action. For RCRA units, SWMUs and/ or AOC outside the FOA boundary for which compliance monitoring and/ or corrective action applies should be listed separately in Items A, B or C as appropriate.

5 Specify the date of Commissions No Further Action approval letter for program requirement and remedy standard completed for all media of concern. [Note: for the purpose of maintaining a historical record, the permittee shall update CP Table I to reflect the new status of the unit / area to include the remedy standard achieved for all media of concern and the date of the Commissions No Further Action approval letter. The units/area shall not be deleted from this table even though the program objectives have been completed and no further action has been approved. Put "N/A" in this column if not applicable.]

**CP Table II: Solid Waste Management Units and/or Areas of Concern for which Corrective Action applies  
pursuant to 30 TAC 335.167**

Unit Number <sup>1</sup>	Unit Name	Notice of Registration (NOR) Number, if applicable	SWMU or AOC	Media Affected <sup>2</sup>	Date Program Requirement and Remedy Standard Completed <sup>3</sup>
1.	<u>Central Plant Waste Management Area/MA PMZ:</u> SWMU Group C1: Belowground OWS Tank 117 Tank 50 Tank 51 Tank 116 Tank 29 SWMU Group C2: Southeast Holding Basin SEHB Sump Tank 26 Tank 82 Lift Station #4 T/TR Storm Water Drainage SWMU Group C3: Tank 3-9 Tank 32 Aboveground OWS SWMU Group C4: Drum Storage Area Impoundment #1 Tank 25-1	 015 010 007 008 009 002  017 None None None None None  013 012 014  001 None 011	SWMU	Soil and GW	<u>Ongoing remedy for affected soil and groundwater</u>
2.	<u>East Plant Waste Management Area:</u> Texaco Landfill #3	None	SWMU	Soil and GW (except Texaco)	Texaco Landfill #3 - Approved No Release 12/8/00



7.	West Chemical AOC	None	AOC	Soil and GW	<u>Ongoing remedy for affected soil and groundwater</u>
8.	Old Pump House No. 5 AOC	None	AOC	Soil and GW	Approved NFA – Pending
9.	Gate 6 AOC	None	AOC	Soil and GW	Approved NFA 12/16/2022
10.	North Plant <u>PMZ</u> AOC	None	AOC	Soil and GW	<u>Ongoing remedy for affected soil and groundwater</u>

Foot Notes:

SWMU ' Solid Waste Management Unit

AOC ' Area of Concern

1 For sites with FOA Authorization, list SWMUs and/or AOCs that were not included in the FOA, and are subject to corrective action.

2 Specify affected media groundwater, soils, etc.

3 Specify the date of Commissions No Further Action approval letter for program requirement and remedy standard completed for all media of concern.

**CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
1. CAMU/North Holding Basin (Zones III and IV)	1,2 Dichloroethane	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Barium	2.000 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Lead	0.015 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Mercury	0.002 <sup>GW</sup> GW <sub>Ing</sub>	NA
2. Southeast Holding Basin (Sandy Channel Fill and Uppermost Natural Transmissive Unit)	1,1 Dichloroethene	2,500 <sup>SW</sup> GW	2,500 <sup>SW</sup> GW
	1,2,3 Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	1,2 Dichloroethane	30,450 <sup>SW</sup> GW	30,450 <sup>SW</sup> GW
	1,2 Dichloropropane	25,300 <sup>SW</sup> GW	25,300 <sup>SW</sup> GW
	2,4,6 Trichlorophenol	2,300 <sup>SW</sup> GW	2,300 <sup>SW</sup> GW
	2,4-D (Dichlorophenoxyacetic Acid)	212,500 <sup>SW</sup> GW	212,500 <sup>SW</sup> GW
	2,4 Dichlorophenol	21,400 <sup>SW</sup> GW	21,400 <sup>SW</sup> GW
	2,4 Dimethylphenol	5,500 <sup>SW</sup> GW	5,500 <sup>SW</sup> GW
	2 – Hexane	13 <sup>SW</sup> GW	13 <sup>SW</sup> GW
	2 – Methyl naphthalene	500 <sup>SW</sup> GW	500 <sup>SW</sup> GW
	2 – Methylphenol (o-Cresol)	98,706 <sup>SW</sup> GW	98,706 <sup>SW</sup> GW
	4 – Bromophenyl Phenyl Ether	167,298 <sup>SW</sup> GW	167,298 <sup>SW</sup> GW
	4 – Methylphenol (p-Cresol)	28,106 <sup>SW</sup> GW	28,106 <sup>SW</sup> GW
	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Acenaphthylene	150 <sup>SW</sup> GW	150 <sup>SW</sup> GW
	Acetone	2,200 <sup>SW</sup> GW	2,200 <sup>SW</sup> GW
	Aniline (Phenylamine, Aminobenzene)	840 <sup>SW</sup> GW	840 <sup>SW</sup> GW
	Anthracene	3.0 <sup>SW</sup> GW	3.0 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Benzo (a) Anthracene	10.10 <sup>SW</sup> GW	10.10 <sup>SW</sup> GW
	Benzo (a) Pyrene	0.80 <sup>SW</sup> GW	0.80 <sup>SW</sup> GW
	Benzo (b) Fluoranthene	1.1 <sup>SW</sup> GW	1.1 <sup>SW</sup> GW
	Benzo (g,h,i) Perylene	1,000 <sup>SW</sup> GW	1,000 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Benzo (k) Fluoranthene	10.80 <sup>SW</sup> GW	10.80 <sup>SW</sup> GW
	Benzyl Alcohol	40,000 <sup>SW</sup> GW	40,000 <sup>SW</sup> GW
	Benzyl Butyl Phthalate	7,780 <sup>SW</sup> GW	7,780 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	bis (2-ethylhexyl) phthalate	632 <sup>SW</sup> GW	632 <sup>SW</sup> GW
	Carbon Disulfide	2,000 <sup>SW</sup> GW	2,000 <sup>SW</sup> GW
	Chlorobenzene	8,780 <sup>SW</sup> GW	8,780 <sup>SW</sup> GW
	Chloroform	8,000 <sup>SW</sup> GW	8,000 <sup>SW</sup> GW
	Chrysene	850 <sup>SW</sup> GW	850 <sup>SW</sup> GW
	Dibenz (a,h) Anthracene	0.11 <sup>SW</sup> GW	0.11 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	Di-n-Butyl Phthalate	4,100 <sup>SW</sup> GW	4,100 <sup>SW</sup> GW
	Di-n-Octyl Phthalate	160 <sup>SW</sup> GW	160 <sup>SW</sup> GW
	Ethylbenzene	20,800 <sup>SW</sup> GW	20,800 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,1380 <sup>SW</sup> GW
	Indeno (1,2,3 – c,d) Pyrene	1.09 <sup>SW</sup> GW	1.09 <sup>SW</sup> GW
	Lead	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	Methyl Ethyl Ketone (2-butanone)	290,000 <sup>SW</sup> GW	290,000 <sup>SW</sup> GW
	Methyl Iso-Butyl Ketone	19,100 <sup>SW</sup> GW	19,100 <sup>SW</sup> GW
	Methylene Chloride	13,000 <sup>SW</sup> GW	13,000 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Phenol	230,000 <sup>SW</sup> GW	230,000 <sup>SW</sup> GW
	Pyrene	20.08 <sup>SW</sup> GW	20.08 <sup>SW</sup> GW
	Pyridine	79,200 <sup>SW</sup> GW	79,200 <sup>SW</sup> GW
	Styrene	38,000 <sup>SW</sup> GW	38,000 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Toluene	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trans -1,2 –Dichloroethylene	93,700 <sup>SW</sup> GW	93,700 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	Vinyl Acetate	20,000 <sup>SW</sup> GW	20,000 <sup>SW</sup> GW
	Vinyl Chloride	23,100 <sup>SW</sup> GW	23,100 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Xylenes (total)	71,100 <sup>SW</sup> GW	71,100 <sup>SW</sup> GW
3. Texmark Chemical Inc. (TCI) Group	Arsenic	0.010 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Benzene	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Ethylbenzene	1.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Styrene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Toluene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Xylenes (total)	10.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
4. Central Plant <del>WMA</del> PMZ (East, Southeast, and South Migration Pathway)	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	56,900 <sup>SW</sup> GW	56,900 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,180 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Pyrene	20.1 <sup>SW</sup> GW	20.1 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	1,2,3-Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	Vinyl Chloride	435 <sup>Air</sup> GW <sub>Inh-V</sub>	434 <sup>Air</sup> GW <sub>Inh-V</sub>
5. Central Plant <del>WMA</del> PMZ (West Migration Pathway)	Benzene	<del>0.010 AAL (AMP-3)</del> 0.005 <sup>GW</sup> GW <sub>Ing</sub> <del>0.011 AAL (AMP-2)</del> <del>0.032 AAL (AMP-1)</del>	0.005 <sup>GW</sup> GW <sub>Ing</sub>
6. <del>West Plant WMA PMZ SWMU Group W3 (SWMU Group W3 West Plant PMZ)/West Chemical AOC</del>	Benzene	1,470 <sup>SW</sup> GW	1,470 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	110 <sup>SW</sup> GW	110 <sup>SW</sup> GW
	Chlorobenzene	2,190 <sup>SW</sup> GW	2,190 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	14,200 <sup>SW</sup> GW	14,200 <sup>SW</sup> GW
	1,2-Dichloroethane	1,030 <sup>SW</sup> GW	1,030 <sup>SW</sup> GW
	Ethylbenzene	5,180 <sup>SW</sup> GW	5,180 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Tetrachloroethylene (PCE)	4,470 <sup>SWG</sup> W	4,470 <sup>SWG</sup> W
	Trichloroethylene	8,490 <sup>SWG</sup> W	8,490 <sup>SWG</sup> W
	Vinyl Chloride	435 <sup>AirGW</sup> Inh-V	435 <sup>AirGW</sup> Inh-V
	Xylenes (total)	17,700 <sup>SWG</sup> W	17,700 <sup>SWG</sup> W
7. North Plant <u>PMZ</u> AOC	MTBE	<del>0.49 AAL (AMP-3)</del> 0.24 <sup>GW</sup> GW <sub>Ing</sub> <del>1.34 AAL (AMP-2)</del> <del>1.34 AAL (AMP-1)</del>	0.24 <sup>GW</sup> GW <sub>Ing</sub>

**Note:** WMA=Waste Management Unit, PMZ=Plume Management Zone

Foot Note:

**GWGW<sub>Ing</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.. In accordance with §350.72(b), GWGW<sub>Ing</sub>, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10<sup>-4</sup>) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

**AirGW<sub>Inh-V</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**SWG<sub>W</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the Protective PCL determined under RSA or RSB for Groundwater- to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**AAL** ACL derived pursuant to 30 TAC §335.160(b) based upon the Protective Concentration level (PCL) established as an Attenuation Action Level as defined in 30 TAC §350(a)(4).

**CP Table IIIA: Corrective Action Program Table of Indicator Parameters and Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
1. <u>CAMU</u> /North Holding Basin (Zones III and IV)	1,2 Dichloroethane	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
2. Southeast Holding Basin (Sandy Channel Fill and Uppermost Natural Transmissive Unit)	1,1 Dichloroethene	2,500 <sup>SW</sup> GW	2,500 <sup>SW</sup> GW
	1,2,3 Trichloropropane	125 <sup>SW</sup> GW	125 <sup>SW</sup> GW
	1,2 Dichloroethane	30,450 <sup>SW</sup> GW	30,450 <sup>SW</sup> GW
	1,2 Dichloropropane	25,300 <sup>SW</sup> GW	25,300 <sup>SW</sup> GW
	2,4,6 Trichlorophenol	2,300 <sup>SW</sup> GW	2,300 <sup>SW</sup> GW
	2,4-D (Dichlorophenoxyacetic Acid)	212,500 <sup>SW</sup> GW	212,500 <sup>SW</sup> GW
	2,4 Dichlorophenol	21,400 <sup>SW</sup> GW	21,400 <sup>SW</sup> GW
	2,4 Dimethylphenol	5,500 <sup>SW</sup> GW	5,500 <sup>SW</sup> GW
	2 – Hexane	13 <sup>SW</sup> GW	13 <sup>SW</sup> GW
	2 – Methylnapthalene	500 <sup>SW</sup> GW	500 <sup>SW</sup> GW
	2 – Methylphenol (o-Cresol)	98,706 <sup>SW</sup> GW	98,706 <sup>SW</sup> GW
	4 – Bromophenyl Phenyl Ether	167,298 <sup>SW</sup> GW	167,298 <sup>SW</sup> GW
	4 – MethylPhenol (p-Cresol)	28,106 <sup>SW</sup> GW	28,106 <sup>SW</sup> GW
	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Acenaphthylene	150 <sup>SW</sup> GW	150 <sup>SW</sup> GW
	Acetone	2,200 <sup>SW</sup> GW	2,200 <sup>SW</sup> GW
	Aniline (Phenylamine, Aminobenzene)	840 <sup>SW</sup> GW	840 <sup>SW</sup> GW
	Anthracene	3.0 <sup>SW</sup> GW	3.0 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Benzo (a) Anthracene	10.10 <sup>SW</sup> GW	10.10 <sup>SW</sup> GW
	Benzo (a) Pyrene	0.80 <sup>SW</sup> GW	0.80 <sup>SW</sup> GW
	Benzo (b) Fluoranthene	1.1 <sup>SW</sup> GW	1.1 <sup>SW</sup> GW
	Benzo (g,h,i) Perylene	1,000 <sup>SW</sup> GW	1,000 <sup>SW</sup> GW
	Benzo (k) Fluoranthene	10.80 <sup>SW</sup> GW	10.80 <sup>SW</sup> GW
	Benzyl Alcohol	40,000 <sup>SW</sup> GW	40,000 <sup>SW</sup> GW
	Benzyl Butyl Phthalate	7,780 <sup>SW</sup> GW	7,780 <sup>SW</sup> GW
	bis (2-Chloroethyl) Ether	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	bis (2-ethylhexyl) phthalate	632 <sup>SW</sup> GW	632 <sup>SW</sup> GW
	Carbon Disulfide	2,000 <sup>SW</sup> GW	2,000 <sup>SW</sup> GW
	Chlorobenzene	8,780 <sup>SW</sup> GW	8,780 <sup>SW</sup> GW
	Chloroform	8,000 <sup>SW</sup> GW	8,000 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Chrysene	850 <sup>SW</sup> GW	850 <sup>SW</sup> GW
	Dibenz (a,h) Anthracene	0.11 <sup>SW</sup> GW	0.11 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	Di-n-Butyl Phthalate	4,100 <sup>SW</sup> GW	4,100 <sup>SW</sup> GW
	Di-n-Octyl Phthalate	160 <sup>SW</sup> GW	160 <sup>SW</sup> GW
	Ethylbenzene	20,800 <sup>SW</sup> GW	20,800 <sup>SW</sup> GW
	Fluoranthene	248 <sup>SW</sup> GW	248 <sup>SW</sup> GW
	Fluorene	4,1380 <sup>SW</sup> GW	4,1380 <sup>SW</sup> GW
	Indeno (1,2,3 – c,d) Pyrene	1.09 <sup>SW</sup> GW	1.09 <sup>SW</sup> GW
	Lead	443 <sup>SW</sup> GW	443 <sup>SW</sup> GW
	Methyl Ethyl Ketone (2-butanone)	290,000 <sup>SW</sup> GW	290,000 <sup>SW</sup> GW
	Methyl Iso-Butyl Ketone	19,100 <sup>SW</sup> GW	19,100 <sup>SW</sup> GW
	Methylene Chloride	13,000 <sup>SW</sup> GW	13,000 <sup>SW</sup> GW
	Naphthalene	10,500 <sup>SW</sup> GW	10,500 <sup>SW</sup> GW
	Phenanthrene	385 <sup>SW</sup> GW	385 <sup>SW</sup> GW
	Phenol	230,000 <sup>SW</sup> GW	230,000 <sup>SW</sup> GW
	Pyrene	20.08 <sup>SW</sup> GW	20.08 <sup>SW</sup> GW
	Pyridine	79,200 <sup>SW</sup> GW	79,200 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Styrene	38,000 <sup>SW</sup> GW	38,000 <sup>SW</sup> GW
	Tetrachloroethylene (PCE)	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Toluene	18,000 <sup>SW</sup> GW	18,000 <sup>SW</sup> GW
	Trans -1,2 –Dichloroethylene	93,700 <sup>SW</sup> GW	93,700 <sup>SW</sup> GW
	Trichloroethylene	34,100 <sup>SW</sup> GW	34,100 <sup>SW</sup> GW
	Vinyl Acetate	20,000 <sup>SW</sup> GW	20,000 <sup>SW</sup> GW
	Vinyl Chloride	23,100 <sup>SW</sup> GW	23,100 <sup>SW</sup> GW
	Xylenes (total)	71,100 <sup>SW</sup> GW	71,100 <sup>SW</sup> GW
3. Texmark Chemical Inc. (TCI) Group	Arsenic	0.010 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Benzene	0.005 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Ethylbenzene	1.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Styrene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Toluene	0.10 <sup>GW</sup> GW <sub>Ing</sub>	NA
	Xylenes (total)	10.00 <sup>GW</sup> GW <sub>Ing</sub>	NA
4. Central Plant <u>WMA</u> PMZ (East, Southeast, and South Migration Pathway)	Acenaphthene	3,380 <sup>SW</sup> GW	3,380 <sup>SW</sup> GW
	Benzene	5,920 <sup>SW</sup> GW	5,920 <sup>SW</sup> GW
	Dibenzofuran	5,440 <sup>SW</sup> GW	5,440 <sup>SW</sup> GW
	cis-1,2-Dichloroethene	56,900 <sup>SW</sup> GW	56,900 <sup>SW</sup> GW

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Fluoranthene	248 <sub>SWGW</sub>	248 <sub>SWGW</sub>
	Fluorene	4,138 <sub>SWGW</sub>	4,180 <sub>SWGW</sub>
	Naphthalene	10,500 <sub>SWGW</sub>	10,500 <sub>SWGW</sub>
	Phenanthrene	385 <sub>SWGW</sub>	385 <sub>SWGW</sub>
	Pyrene	20.1 <sub>SWGW</sub>	20.1 <sub>SWGW</sub>
	Tetrachloroethylene (PCE)	18,000 <sub>SWGW</sub>	18,000 <sub>SWGW</sub>
	Trichloroethylene	34,100 <sub>SWGW</sub>	34,100 <sub>SWGW</sub>
	1,2,3-Trichloropropane	125 <sub>SWGW</sub>	125 <sub>SWGW</sub>
	Vinyl Chloride	435 <sub>AirGW<sub>Inh-V</sub></sub>	434 <sub>AirGW<sub>Inh-V</sub></sub>
5. Central Plant <del>WMA</del> PMZ (West Migration Pathway)	Benzene	<del>0.010 AAL (AMP-3)</del> 0.005 <sub>GW<sub>Ing</sub></sub> <del>0.011 AAL (AMP-2)</del> <del>0.032 AAL (AMP-1)</del>	0.005 <sub>GW<sub>Ing</sub></sub>
6. <del>West Plant WMA PMZ SWMU Group W3 (SWMU Group W3 West Plant PMZ)</del> /West Chemical AOC	Benzene	1,470 <sub>SWGW</sub>	1,470 <sub>SWGW</sub>
	bis (2-Chloroethyl) Ether	110 <sub>SWGW</sub>	110 <sub>SWGW</sub>
	Chlorobenzene	2,190 <sub>SWGW</sub>	2,190 <sub>SWGW</sub>
	cis-1,2-Dichloroethene	14,200 <sub>SWGW</sub>	14,200 <sub>SWGW</sub>
	1,2-Dichloroethane	1,030 <sub>SWGW</sub>	1,030 <sub>SWGW</sub>

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standards (mg/l)	COLUMN C Groundwater Protection Standards at the POE (mg/l)
	Ethylbenzene	5,180 <sup>SWGW</sup>	5,180 <sup>SWGW</sup>
	Tetrachloroethylene (PCE)	4,470 <sup>SWGW</sup>	4,470 <sup>SWGW</sup>
	Trichloroethylene	8,490 <sup>SWGW</sup>	8,490 <sup>SWGW</sup>
	Vinyl Chloride	435 <sup>AirGW<sub>Inh-V</sub></sup>	435 <sup>AirGW<sub>Inh-V</sub></sup>
	Xylenes (total)	17,700 <sup>SWGW</sup>	17,700 <sup>SWGW</sup>
7. North Plant <u>PMZ</u> AOC	MTBE	<del>6.49 AAL (AMP-3)</del> 0.24 <sup>GWGW<sub>Ing</sub></sup> <del>1.34 AAL (AMP-2)</del> <del>1.34 AAL (AMP-1)</del>	0.24 <sup>GWGW<sub>Ing</sub></sup>

**Note:** WMA=Waste Management Unit, PMZ=Plume Management Zone

Foot Note:

**GWGW<sub>Ing</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.. In accordance with §350.72(b), GWGW<sub>Ing</sub>, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10<sup>-4</sup>) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

**AirGW<sub>Inh-V</sub>** ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**SWGW** ACL pursuant to 30 TAC §335.160(b) based upon the Protective PCL determined under RSA or RSB for Groundwater- to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

**AAL** ACL derived pursuant to 30 TAC §335.160(b) based upon the Protective Concentration level (PCL) established as an Attenuation Action Level as defined in 30 TAC §350(a)(4).

**CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Concentration Limits (mg/l)
Reserved		

[**Note:** This Table should provide the long list of hazardous constituents that are reasonably expected to be in or derived from waste placed in the units, and may not necessarily be detected and that are to be monitored annually to determine if any new constituents need to be added to CP Table IVA. Also, instead of listing individual constituents of concern (COCs), Appendix IX can be referenced in this table. If Appendix IX list and associated Practical Quantitation Limit (PQL) or Method Quantitation Limit (MQLs) are being required instead of listing individual COCs, add this sentence: The Permittee may petition the Executive Director for deletion of specific parameters from Appendix IX analysis if the Permittee can demonstrate that the constituents were never used in the facility's operation or were never disposed in the waste management area.]

Foot Note:

In the Footnote use one of the following Quantitation Limit designations as the concentration limit if RRR or TRRP apply

**\* For RRR use the following designation, or\***

ND Non-detectable at PQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. PQL is indicated in parentheses. PQL is the lowest concentrations of analytes in groundwaters that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating condition.

BKG Background as determined in accordance with 30 TAC 350.4(a)(6).

**\* Use the following designation if TRRP applies:\***

ND Non-detectable at MQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC §350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

BKG Background as determined in accordance with 30 TAC 350.4(a)(6).

**CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and the Groundwater Protection Standard**

Unit Name	COLUMN A Hazardous Constituents	COLUMN B Groundwater Protection Standard (mg/l)
Reserved		

\* [ Note: This Table should provide a list of all hazardous constituents detected above the Quantitation Limits specified in CP Table IV – Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Practical Quantitation Limits or Method Quantitation Limits for Compliance Monitoring. CP Table IVA constituents are to be monitored semiannually to verify achievement of the GWPS. ]

Foot Note:

Use the following GWPS footnote designations if Risk Reduction Rules (RRR) or Texas Risk Reduction Program (TRRP) apply:

**\* For RRR use the following designation, or\***

MSC ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Medium-Specific Concentration, Residential {...or Industrial...} Risk Reduction Standard No. 2 {...or No. 3} specified in 30 TAC §335 Subchapter S.

MCL ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Maximum Contaminant Level specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subparts B and G.

SMCL ACL pursuant to 30 TAC §335.160(b) based upon the Groundwater Secondary Maximum Contaminant Level specified in 40 CFR Part 143, National Secondary Drinking Water Regulations.

AL ACL pursuant to 30 TAC §335.160(b) based upon the Action Level specified in 40 CFR Part 141, National Primary Drinking Water Regulations Subpart I.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at PQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. PQL is indicated in parentheses. PQL is the lowest concentrations of analytes in groundwaters that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating condition.

**\* Use the following designation if TRRP applies:\***

GWGWIng ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with §350.72(b), GWGWIng, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to  $1 \times 10^{-4}$ ) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 non-carcinogenic chemicals of concern within a source medium.

GWGWClass3 ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) Tier I for Class 3 Groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

AirGWIInh-V ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 Groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

SWGWL ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater-to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

SEDGW ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater-to-sediment PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

ECOGW ACL pursuant to 30 TAC §335.160(b) based upon the PCL determined under RSA or RSB for Groundwater- based on ecological receptor(s) PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at MQL as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC §350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

**CP Table V: Designation of Wells**

Point of Compliance Wells:

1. ~~CAMU~~/North Holding Basin/~~CAMU~~  
Zone III – MW-7 and RW-16  
Zone IV – MW-6 and RW-17
2. Southeast Holding Basin  
Sandy Channel Fill (SCF) and Uppermost Natural Transmissive Unit (UNTU) – MW-2R,  
MW-3R  
Uppermost Natural Transmissive Unit (UNTU) – MW-4R
3. Texmark Chemical Inc. (TCI) Group  
MW-18TCI, MW-19TCI, RW-3, and RW-5
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. ~~West Plant WMA PMZ SWMU Group W3 (SWMU Group W3West Plant PMZ)/West  
Chemical AOC~~  
None
7. North Plant PMZ AOC  
None

Point of Exposure Wells:

1. ~~CAMU~~/North Holding Basin/~~CAMU~~  
None
2. Southeast Holding Basin  
Sandy Channel Fill (SCR) and Uppermost Natural Transmissive Unit (UNTU) – MW-5,  
MW-13, and MW-33
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
RI-1-17 and RI-1-18
5. Central Plant WMA PMZ (West Migration Pathway)  
POE-1, POE-2, RI-1-14, RI-3-02, and RI-3-03
6. ~~West Plant WMA PMZ SWMU Group W3 (SWMU Group W3West Plant PMZ)/West  
Chemical AOC~~

P-2, MW-18, MW-25, MW-26, and MW-28

7. North Plant PMZ AOC  
MW-15, MW-16, and MW-18

Alternate Point of Exposure Wells:

1. CAMU/Former North Holding Basin  
None
2. Southeast Holding Basin  
None
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. West Plant WMA PMZ SWMU Group W3 (SWMU Group W3 West Plant PMZ)/West  
Chemical AOC  
None
7. North Plant PMZ AOC  
None

Background Wells:

1. CAMU/Former North Holding Basin  
Zone III – MW-1, MW-8
2. Southeast Holding Basin  
None
3. Texmark Chemical Inc. (TCI) Group  
None
4. Central Plant WMA PMZ (East, Southeast, and South Migration Pathway)  
None
5. Central Plant WMA PMZ (West Migration Pathway)  
None
6. West Plant WMA PMZ SWMU Group W3 (SWMU Group W3 West Plant PMZ)/West  
Chemical AOC  
None

7. North Plant PMZ AOC  
MW-11, MW-13A

**Note:** Wells that are not listed in this table are subject to change, upon approval by the Executive Director, without modification to the Compliance Plan.

**CP Table VI: Compliance Period for RCRA-Regulated Units**

<del>CAMU</del> /North Holding Basin/ <del>CAMU</del>	Year or Number of Years
Year Waste Management Activities Initiated	1975
Year Closed	Active CAMU
Compliance Period	NA*
Compliance Period Began	1992

\*Compliance Period will be evaluated upon closure of the Corrective Action Management Unit (CAMU).

Southeast Holding Basin	Year or Number of Years
Year Waste Management Activities Initiated	1974
Year Closed	1985
Compliance Period	11 Years
Compliance Period Began	1994

**NOD ID CP4**

**CP Table IX**

**CP Table IX: Description of Uppermost Aquifer**

Groundwater is typically encountered approximately ten feet below grade (approximately five feet above Mean Sea Level) in the uppermost aquifer. The uppermost aquifer is part of the Beaumont Formation and consists of recent alluvium. The alluvial material consists of clay, silt, and sand. The Beaumont Formation in this area is characterized by clay, silt, and occasional sand layers ranging in thickness from 30 to 100 feet. The Beaumont Formation is generally a poorly bedded, calcareous clay of various colors, containing thin, discontinuous stringers and lenses of silt and fine sand. Concretions of calcium carbonate, iron oxide and iron-manganese oxides are found in zones of weathering. The unit contains mainly stream channel point bar, natural levee and backswamp deposits. Well logs in the Galena Park area indicate that alternating clays, silts, and infrequent sands of the Beaumont, Montgomery, Bentley and Willis formations extend to depths of approximately 700 feet. All these formations are thought to have formed by the discharge of sediments from stream gaps. These deposits are deltaic and fluvial in origin and difficult to distinguish because of their similarities. Each formation dips gently gulfward, with groundwater flow generally toward the south (Houston Ship Channel).

**NOD ID CP6**

**SAP Example Table**

Table 1D - Central Plant  
Gauging Data and Groundwater Field Parameters  
  
Kinder Morgan - Galena Park Terminal  
Galena Park, Texas

Well I.D.	2H24 # Wells Sampled	2H24 Added # Wells Gauged	RW Sampled by Port	MW Low-Flow Sampled	Top of Casing Elev (ft-msl)	Depth to LNAPL (ft-toc)	Depth to Water (ft-toc)	LNAPL Thickness (ft)	DNAPL Thickness (ft)	Corrected GW Elev (ft-msl)	Water Column (ft)	Total Depth (ft-toc)	Screen Length (ft)	Sample Intake (ft-toc)	Well Inspection	pH (S.U.)	Temp. (C)	S.C. (umhos)	D.O. (mg/L)	ORP (mV)	Turbidity (NTU)	Water Clarity	Comments
Monitor Wells																							
AMP-01																							
AMP-02																							
AMP-03																							
POE-01																							
MW-35																							
MW-36																							
MW-37																							
MW-38																							
RI-1-14																							
RI-1-17																							
RI-1-18																							
RI-3-01																							
RI-3-02																							
RI-3-03																							
Recovery Well																							
POE-02																							
Gauge-Only Wells																							
RI-1-09																							
MW-40																							
MW-41																							Well destroyed previously, per AECOM

Notes: Semiannual monitoring (planned January & July)  
NP = No product (LNAPL), NM = Not measured  
Corrected Groundwater Elevation = (LNAPL Thickness x 0.87) + Depth to Groundwater, per AECOM  
Sample intakes at midscreen, per AECOM, where permitted by available water column  
\* POE-2 - 2-in diam. recovery well; casing diameter blocked with recovery hoses, etc., prohibits passage of gauging probe; therefore DTW not measured  
RI-1-17, MW-35 toc elevs. per 1-31-22 email from AECOM to HMI

**NOD ID CP7**

**CP Table VII**

**CP Table VII: Reporting Requirements**

Item	Program	Reporting Frequency	Requirements
1.	All programs	Annual by March 1	Each report shall be certified by a qualified engineer and/or geoscientist.
2.	Corrective Action	Annual by March 1	A table of all modifications and amendments made to this Compliance Plan with their corresponding approval dates by the Executive Director or the Commission and a brief description of each action;
3.	Corrective Action	Annual by March 1	A summary of any activity within an area subject to institutional control.
4.	Corrective Action	Annual by March 1	Tabulation of well casing elevations in accordance with CP Attachment C;
5.	Corrective Action	Annual by March 1	Certification and well installation diagram for any new well installation or replacement and certification for any well plugging and abandonment;
6.	Corrective Action	Annual by March 1	Recommendation for any changes to the program;
7.	Corrective Action	Annual by March 1	Any other items requested by the Executive Director;
8.	Corrective Action	Annual by March 1	Water table maps shall be prepared from the groundwater data collected pursuant to Permit Provision XI.G. and shall be evaluated by the permittee with regard to the following parameters: <ul style="list-style-type: none"> <li>a. Development and maintenance of a cone of depression during operation of the system;</li> <li>b. Direction and gradient of groundwater flow;</li> <li>c. Effectiveness of hydrodynamic control of the contaminated zone during operation; and</li> <li>d. Estimation of the rate and direction of groundwater contamination migration.</li> </ul>

Item	Program	Reporting Frequency	Requirements
9.	Corrective Action	Annual by March 1	The permittee shall submit a report to each recipient listed in <u>Provision XI.J.3.</u> , which includes the all applicable information listed in this table (CP Table VII: Reporting Requirements), determined since the previously submitted report, if those items are applicable. If both Corrective Action and Compliance Monitoring Programs are authorized, then the Groundwater Monitoring Report required by CP Table VII shall contain information required for both programs.
10.	Corrective Action	Annual by March 1	The Corrective Action System(s) authorized under <u>Provision XI.B.3.</u> in operation during the reporting period and a narrative summary of the evaluations made in accordance with Permit Sections XI.E., XI.F., and XI.G. for the preceding reporting period. The reporting periods shall be January 1 through June 30 and July 1 through December 31 for Corrective Action Monitoring, unless an alternative semiannual schedule is approved by the Commission. The period for Compliance Monitoring shall be based on the calendar year.
11.	Corrective Action	Annual by March 1	The method(s) utilized for management of recovered/purged groundwater shall be identified in accordance with <u>Provision XI.B.8.</u> The permittee shall maintain this list as part of the facility operating record and make it available for inspection upon request.

Item	Program	Reporting Frequency	Requirements
12.	Corrective Action	Annual by March 1	An updated table and map of all monitoring and corrective action system wells. The wells to be sampled shall be those wells proposed in the Compliance Plan Application referenced in <u>Provision I.B.</u> and any changes subsequently approved by the Executive Director pursuant to <u>Provision XI.B.3.</u> Provide in chronological order, a list of those wells which have been added to, or deleted from, the groundwater monitoring and remediation systems since original issuance of the Compliance Plan. Include the date of the Commission's approval for each entry;
13.	Corrective Action	Annual by March 1	The results of the chemical analyses, submitted in a tabulated format acceptable to the Executive Director which clearly indicates each parameter that exceeds the Groundwater Protection Standard (GWPS). Copies of the original laboratory report for chemical analyses showing detection limits and quality control and quality assurance data shall be provided if requested by the Executive Director;
14.	Corrective Action	Annual by March 1	Tabulation of all water level elevations required in <u>Provision XI.F.3.d.(1)</u> , depth to water measurements, and total depth of well measurements collected since the data that was submitted in the previous monitoring report;
15.	Corrective Action	Annual by March 1	Potentiometric surface maps showing the elevation of the water table at the time of sampling, delineation of the radius of influence of the Corrective Action System, and the direction of groundwater flow gradients outside any radius of influence;
16.	Corrective Action	Annual by March 1	Tabulation of all data evaluation results pursuant to <u>Provision XI.F.4.</u> and status of each well with regard to compliance with the Corrective Action objectives and compliance with the GWPS;
17.	Corrective Action	Annual by March 1	An updated summary as required by CP Table VIII;

Item	Program	Reporting Frequency	Requirements
18.	Corrective Action	Annual by March 1	Summary of any changes made to the monitoring/ corrective action program and a summary of well inspections, repairs, and any operational difficulties;
19.	Corrective Action	Annual by March 1	A notation of the presence or absence of non-aqueous phase liquids (NAPLs), both light and dense phases, in each well during each sampling event since the last event covered in the previous monitoring report and tabulation of depth and thickness of NAPLs, if detected;
20.	Corrective Action	Annual by March 1	Quarterly tabulations of quantities of recovered groundwater and NAPLs, and graphs of monthly recorded flow rates versus time for the Recovery Wells during each reporting period. A narrative summary describing and evaluating the NAPL recovery program shall also be submitted;
21.	Corrective Action	Annual by March 1	Tabulation of the total contaminant mass recovered from each recovery system for each reporting period;
22.	Corrective Action	Annual by March 1	Maps of the contaminated area where GWPSs are exceeded depicting concentrations of CP Table IIIA constituents and any newly detected CP Table III constituents as isopleth contours or discrete concentrations if isopleth contours cannot be inferred. Areas where concentrations of constituents exceed the GWPS should be clearly delineated. Depict the boundary of the plume management zone (PMZ), if applicable;
23.	Corrective Action	Annual by March 1	Maps and tables indicating the extent and thickness of the NAPLs both light and dense phases, if detected;

Item	Program	Reporting Frequency	Requirements
24.	Corrective Action	Annual by March 1	Corrective Measures Implementation (CMI) Progress Report or Response Action Effectiveness Report or Response Action Completion Report to be submitted as a section of the Compliance Plan report in accordance with <u>Provision XI.H.6.</u> , if necessary. The permittee will include a narrative summary of the status of the approved final corrective measures conducted in accordance with the approved CMI Workplan or RAP, and that the requirements of <u>Provision XI.H.7.</u> are being met.
25.	Corrective Action	Annual by March 1	The permittee will include a narrative summary of the status of each Solid Waste Management Unit (SWMU) and/or Area of Concern (AOC) subject to the requirements of <u>Permit Provision XI.H.</u> and ICM Program for a SWMU and/or AOC which documents that the objectives of <u>Provision XI.H.8.b.</u> are being achieved. This summary shall be included as a section of the Compliance Plan groundwater monitoring report.
26.	PMZ	Annual by March 1	A summary evaluating the effectiveness of the corrective action system in controlling migration beyond the downgradient boundary and vertical limit of the PMZ to achieve the GWPS. The summary shall include an evaluation of whether the attenuation action levels are not exceeded at their respective attenuation monitoring points pursuant to 30 TAC Sections 350.33(f)(4)(A) and 350.33(f)(4)(D)(ii), if applicable;
27.	PMZ	Annual by March 1	An estimate of the percentage of the response action which has been completed within the PMZ, if applicable;
28.	PMZ	Annual by March 1	An estimate in years of the additional time necessary to complete the response actions for the PMZ, if applicable;
29.	PMZ	Annual by March 1	A determination whether sufficient progress is being made to achieve the selected remedy standard within a reasonable time frame given the circumstance of the affected property in the PMZ, if applicable.

Item	Program	Reporting Frequency	Requirements
30.	Facility Operations Area (FOA)	Not Applicable	<p>The following additional reporting requirements to fulfill requirements of 30 TAC Section 350.134 and 30 TAC Section 350.135. These include but are not limited to:</p> <ul style="list-style-type: none"><li>a. Provide an average of both lost workday injury case rates and injury incidence rates for the most recent three (3) year period compared to the most recent specific industry national average published by the Bureau of Labor Statistics.</li></ul> <p>(continued on next page)</p>

Item	Program	Reporting Frequency	Requirements
30. (contd.)	Facility Operations Area (FOA)	Not Applicable	<ul style="list-style-type: none"> <li>b. Document that the worker health and safety program meets the requirements of the Occupational Safety and Health Administration (OSHA) by providing records of the OSHA compliance history or the results of the most recent audit of the health and safety programs by the OSHA or a third party certified professional industrial hygienist and safety specialist. An audit is required anytime there is a significant change to the health and safety program, or at a minimum every three (3) years, the results of which indicate the program is satisfactory</li> <li>c. Document a compliance history ranking of average or better for the TCEQ.</li> <li>d. Document the pollution prevention program that has a goal of prevention of releases of COCs to environmental media within the FOA.</li> <li>e. Provide a statement that the program required in 30 TAC Section 350.134(a)(7) to protect workers within the FOA from environmental media having concentrations of COCs greater than PCLs or action levels based on the health and safety program is still in effect. In addition, the permittee shall provide, for the preceding year, an updated map delineating areas where the Soil Response Action Plan has been implemented pursuant to 30 TAC Section 350.135(a)(5).</li> <li>f. Document there have not been any significant outstanding non_compliance issues resulting from inspections for compliance with the RCRA permit or order, if any.</li> </ul>

Item	Program	Reporting Frequency	Requirements
30. (contd.)	Facility Operations Area (FOA)	Not Applicable	<ul style="list-style-type: none"> <li>g. Document areas of ecological impact identified within the FOA and procedures for responding to these identified ecologically impacted areas on a continual basis. Review any ecologically impacted areas annually and report any new ecological impacts within thirty (30) days of verification of impact.</li> <li>h. Document activity associated with tracking and responding to releases to soil and groundwater above reportable quantities, which occur within the FOA after the issuance of the Compliance Plan, in accordance with 30 TAC Section 350.135(a)(7).</li> <li>i. Document any NAPL occurrences and any procedure(s) used to address known NAPLs and any NAPLs identified during the operational life of the FOA. This should include any previously discovered NAPL occurrences.</li> <li>j. Provide documentation that access is restricted to the FOA.</li> </ul>

**NOD ID CP8**

**CP Table VIII**

**CP Table VIII: Compliance Schedule**

<b>Item</b>	<b>Compliance Schedule</b> (from the date of issuance of the Compliance Plan unless otherwise specified)	<b>Regulatory Citation</b>	<b>Requirement</b>
A.	60 days	Compliance Plan	Submit to the Executive Director a schedule summarizing all activities required by the Compliance Plan. The schedule shall list the starting dates of all routine activities. The permittee shall include an updated schedule in the groundwater monitoring report required by <u>Provision XI.G.3.</u> and CP Table VII. The schedule shall list the activity or report, the Compliance Plan Section which requires the activity or report, and the calendar date the activity or report is to be completed or submitted (if this date can be determined.)
B.	Requirement completed on September 2018 and included in August 2024 permit application	30 TAC §335.163(4) and Provision XI.F.2.	Submit to the Executive Director for review and approval a Sampling & Analysis Plan (SAP) unless the SAP has been submitted with the application and referenced in <u>Provision I.B.</u>
C.	During the first thirty (30) days of each first and third quarter	30 TAC §335.166	Corrective Action monitoring shall be conducted on a semiannual basis for the RCRA-regulated units listed in CP Table I.A. which are subject to the Corrective Action Program.
D.	Not Applicable	30 TAC §335.165	Compliance Monitoring shall be conducted on <del>Choose an item.</del> basis for the RCRA-regulated units listed in CP Table I.B. which are subject to the Compliance Monitoring Program.
E.	During the first thirty (30) days of each first and third quarter	30 TAC §335.167	Corrective Action monitoring shall be conducted on a semiannual basis for the solid waste management units (SWMUs) and/or areas of concern (AOCs) listed in CP Table I.C. which are subject to the Corrective Action Program.

Item	Compliance Schedule (from the date of issuance of the Compliance Plan unless otherwise specified)	Regulatory Citation	Requirement
F.	Not Applicable	30 TAC §335.151	Alternative Corrective Action monitoring shall be conducted on Choose an item. basis for the RCRA-regulated units, SWMUs, and/or AOCs listed in CP Table I.D. which are subject to the Corrective Action Program.
G.	Not Applicable	30 TAC Section 335.156 and Chapter 350	FOA Corrective Action monitoring shall be conducted on Choose an item. basis for the RCRA-regulated units, SWMUs, and/or AOCs listed in CP Table I.E., which are located within the FOA Boundary and are subject to the Corrective Action Program.
H.	Requirement completed on Central Plant WMA PMZ: 7/30/14; West Plant WMA PMZ: 5/7/18 120 days: North Plant PMZ AOC	30 TAC §350.31(g) and §350.33(f) (4)(C)(i)	If a plume management zone (PMZ) has been authorized, submit to the Executive Director proof of compliance with the institutional control requirements which provides notice of the existence and location of the PMZ and which prevents exposure to groundwater from this zone until such a time when the concentrations of the chemicals of concern are less than the groundwater protection standards (GWPS) listed on CP Table III.
I.	Notify within 30 days	30 TAC §350.33(k)	If a PMZ has been authorized, after an unexpected event occurs which indicates that additional response actions will be required at an affected property.

Notes:

1. Please note that Corrective Action monitoring is conducted on semiannual basis unless a less frequent monitoring schedule is approved based on plume stability and achievement of Corrective Action objectives.

**NOD ID CP9**

**Tables XI.E.2.e and Table XI.E.3**

**Table XI.E.2 Groundwater Monitoring Cost Estimate**

		Central Plant WMA PMZ	West Plant WMA PMZ (SWMU Group W3/ West Chemical AOC)	Texmark Chemical Inc. (TCI) Group	North Plant PMZ AOC	CAMU/North Holding Basin	Southeast Holding Basin					
1. Annual Sampling and Analysis Cost:												
A. Background Wells												
(1) Number of wells	o		o	o	2	2	o					
(2) Sample analysis cost per well	350	\$/well	225	\$/well	135	\$/well	190	\$/well	85	\$/well	350	\$/well
(3) Number of sampling events per year		/yr		/yr		/yr	2	/yr	2	/yr		/yr
(4) Sampling cost (1 x 2 x 3)	o	\$	o	\$	o	\$	760	\$	340	\$	o	\$
B. Point of Compliance Wells												
(1) Number of wells	o		o	4	o	4	3					
(2) Sample analysis cost per well	350	\$/well	225	\$/well	135	\$/well	190	\$/well	85	\$/well	350	\$/well
(3) Number of sampling events per year		/yr		/yr	1	/yr		/yr	2	/yr	2	/yr
(4) Sampling cost (1 x 2 x 3)	o	\$	o	\$	540	\$	o	\$	680	\$	2,100	\$
C. Recovery Wells												
(1) Number of wells	o		o	o	o	4	9					
(2) Sample analysis cost per well	350	\$/well	225	\$/well	135	\$/well	190	\$/well	85	\$/well	350	\$/well

	Central Plant WMA PMZ	West Plant WMA PMZ (SWMU Group W3/ West Chemical AOC)	Texmark Chemical Inc. (TCI) Group	North Plant PMZ AOC	CAMU/North Holding Basin	Southeast Holding Basin
(3) Number of sampling events per year	/yr	/yr	/yr	/yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	0 \$	0 \$	0 \$	0 \$	680 \$	6,300 \$
D. Corrective Action Observation Wells						
(1) Number of wells	4	5	4	2	5	20
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	1 /yr	2 /yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	2,250 \$	540 \$	760 \$	850 \$	14,000 \$
E. Point of Exposure Wells						
(1) Number of wells	7	5	0	3	0	3
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	/yr	2 /yr	/yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	4,900 \$	2,250 \$	0 \$	1,140 \$	0 \$	2,100 \$
F. Supplemental Wells						
(1) Number of wells	3	13	0	3	3	0
(2) Sample analysis cost per	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well

	Central Plant WMA PMZ	West Plant WMA PMZ (SWMU Group W3/ West Chemical AOC)	Texmark Chemical Inc. (TCI) Group	North Plant PMZ AOC	CAMU/North Holding Basin	Southeast Holding Basin
well						
(3) Number of sampling events per year	2 /yr	2 /yr	/yr	2 /yr	2 /yr	/yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	5,850 \$	0 \$	1,140 \$	510 \$	0 \$
G. Field Quality Control Sampling						
(1) Number of wells	4	4	4	4	4	4
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	1 /yr	2 /yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	1,800 \$	540 \$	1,520 \$	680 \$	2,800 \$
2. Sampling Labor Cost:						
A. Hours of sampling per well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well
B. Number of sampling technicians per well	2	2	2	2	2	2
C. Charge per hour	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr
D. Total number of wells to be sampled annually	Wells	Wells	12 Wells	Wells	Wells	Wells
E. Total number of wells sampled	19 Wells	27 Wells	Wells	14 Wells	22 Wells	39 Wells



	Central Plant WMA PMZ		West Plant WMA PMZ (SWMU Group W3/ West Chemical AOC)		Texmark Chemical Inc. (TCI) Group		North Plant PMZ AOC		CAMU/North Holding Basin		Southeast Holding Basin	
F. Cost of Recovery well system (D x E)	o	\$	o	o	o	\$	o	\$	o	\$	o	\$
<b>*Total Well Installation Cost (3C + 3F)</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>
4. Administrative Cost:												
A. Annual cost for record-keeping and report preparation	5,500	\$	5,500	\$	5,500	\$	5,500	\$	9,000	\$	9,000	\$
<b>* Annual Administrative Cost (4A)</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>9,000</b>	<b>\$</b>	<b>9,000</b>	<b>\$</b>
5. Inspection and Maintenance Cost for the Monitoring Program:												
A. Operator's time (hours) on-site for inspections and maintenance per year	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr
B. Charge or salary per hour	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr
C. Charge per hour	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr
D. Replacement of parts and equipment per year	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr
<b>* Annual Inspections / Maintenance Cost for the Groundwater Monitoring Program (5C + 5D)</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>

**Table XI.E.3. – Financial Assurance Summary**

Annual Off-Site Liquid Treatment / Disposal Cost	\$ 460,000	
Annual On-Site Treatment / Disposal Cost	\$ 27,500	
Annual Inspection / Maintenance / Operation Cost For The Corrective Action Program	\$ 127,800	
Annual Groundwater Monitoring Cost	\$ 120,580	
Annual Administrative Cost	\$ 40,000	
Annual Inspection And Maintenance Cost For The Groundwater Monitoring Program ( <b>Included in Annual Inspection/Maintenance for Corrective Action Program</b> )	\$ 0	
<b>Annual Sub Total</b>	<b>\$ 775,880</b>	
Total Years Used For Calculating Financial Assurance	11	Yrs
Remediation Cost (Annual Sub Total x Total Years Used)	\$ 8,534,680	
On-Site Waste Water Treatment System Capital Cost	\$ 0	
Total Well Cost	\$ 0	
10% Contingency	\$ 853,468	
<b>Grand Total Cost (nearest \$1000)</b>	<b>\$ 9,388,148</b>	

**Table XI.E.2 Groundwater Monitoring Cost Estimate**

	Central Plant WMA PMZ	West Plant WMA PMZ (SWMU Group W3/- West Chemical AOC)PMZ	Texmark Chemical Inc. (TCI) Group	North Plant PMZ AOC	NHBCAMU/ North Holding Basin	SEHBSouthea st Holding Basin
1. Annual Sampling and Analysis Cost:						
A. Background Wells						
(1) Number of wells	40	0	0	2	2	0
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	/yr	/yr	2 /yr	2 /yr	/yr
(4) Sampling cost (1 x 2 x 3)	0790 \$	0 \$	0 \$	380760 \$	170340 \$	0 \$
B. Point of Compliance Wells						
(1) Number of wells	0	0	4	0	4	3
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	/yr	/yr	1 /yr	/yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	0 \$	0 \$	540 \$	0 \$	680 \$	20102.100 \$
C. Recovery Wells						
(1) Number of wells	0	0	0	0	4	9
(2) Sample analysis cost per	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well

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	Central Plant WMA PMZ	West Plant WMA PMZ (SWMU Group W3/- West Chemical AOC)PMZ	Texmark Chemical Inc. (TCI) Group	North Plant PMZ AOC	HHBCAMU/ North Holding Basin	SEHBSouthea st Holding Basin
well						
(3) Number of sampling events per year	/yr	/yr	/yr	/yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	0 \$	0 \$	0 \$	0 \$	680 \$	6,300 \$
D. Corrective Action Observation Wells						
(1) Number of wells	4	5	4	2	5	20
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	1 /yr	2 /yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	2,250 \$	540 \$	760 \$	850 \$	14,000 \$
E. Point of Exposure Wells						
(1) Number of wells	7	5	0	3	0	3
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	/yr	2 /yr	/yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	4,900 \$	2,250 \$	0 \$	5491,140 \$	0 \$	2,100 \$
F. Supplemental Wells						
(1) Number of wells	43	13	0	3	3	0

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	Central Plant <u>WMA PMZ</u>	West Plant <u>WMA PMZ</u> (SWMU Group <u>W3/-</u> West Chemical <u>AOC</u> ) <u>PMZ</u>	Texmark <u>Chemical</u> <u>Inc. (TCI)</u> Group	North Plant <u>PMZ AOC</u>	<del>NHBCAMU/</del> <u>North</u> <u>Holding</u> <u>Basin</u>	<del>SEHBSouthea</del> <u>st Holding</u> <u>Basin</u>
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	/yr	2 /yr	2 /yr	/yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	5,850 \$	0 \$	1,140 \$	510 \$	0 \$
G. Field Quality Control Sampling						
(1) Number of wells	4	4	4	4	4	4
(2) Sample analysis cost per well	350 \$/well	225 \$/well	135 \$/well	190 \$/well	85 \$/well	350 \$/well
(3) Number of sampling events per year	2 /yr	2 /yr	1 /yr	2 /yr	2 /yr	2 /yr
(4) Sampling cost (1 x 2 x 3)	2,800 \$	1,800 \$	540 \$	1,520 \$	680 \$	2,800 \$
2. Sampling Labor Cost:						
A. Hours of sampling per well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well	1.5 hrs/well
B. Number of sampling technicians per well	2	2	2	2	2	2
C. Charge per hour	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr	75 \$/hr
D. Total number of wells to be	Wells	Wells	12 Wells	Wells	Wells	Wells

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sampled annually

E. Total number of wells sampled semi-annually

F. Total number of wells sampled quarterly

G. Total number of wells sampled monthly

H. Total number of wells sampled per year  
(2D)+(2E x 2)+(2Fx4)+(2Gx12)

I. Sampling Labor Cost (2A x 2B x 2C x 2H)

**\* Annual Groundwater Monitoring Cost**

**3. Well Installation (typical cost):**

A. Monitor well installation cost per well

B. Number of monitor wells to be installed

C. Cost of monitor well system (A x B)

D. Recovery well installation cost per well

Central Plant WMA PMZ		West Plant WMA PMZ (SWMU Group W3/- West Chemical AOC)PMZ		Texmark Chemical Inc. (TCI) Group		North Plant PMZ AOC		NHBCAMU/ North Holding Basin		SEHBSouthea st Holding Basin	
19	Wells	27	Wells		Wells	14	Wells	22	Wells	39	Wells
	Wells		Wells		Wells		Wells		Wells		Wells
	Wells		Wells		Wells		Wells		Wells		Wells
38	total wells sampled / year	54	total wells sampled / year	12	total wells sampled / year	28	total wells sampled / year	44	total wells sampled / year	78	total wells sampled / year
8,775550		12,150		2,700		6,300		9,900		17,550	
22,07521.850	\$	22,05024,300	\$	4,320	\$	9,50011.620	\$	13,470640	\$	44,760850	\$
0	\$/well	0	\$/well	0	\$/well	0	\$/well	0	\$/well	0	\$/well
0	Wells	0	Wells	0	Wells	0	Wells	0	Wells	0	Wells
0	\$	0	\$	0	\$	0	\$	0	\$	0	\$
0	\$/well	0	\$/well	0	\$/well	0	\$/well	0	\$/well	0	\$/well

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	<b>Central Plant WMA PMZ</b>		<b>West Plant WMA PMZ (SWMU Group W3/- West Chemical AOC)PMZ</b>		<b>Texmark Chemical Inc. (TCI) Group</b>		<b>North Plant PMZ AOC</b>		<b>NHBCAMU/ North Holding Basin</b>		<b>SEHBSouthea st Holding Basin</b>	
E. Number of Recovery Wells to be installed	o	Wells	o	Wells	o	Wells	o	Wells	o	Wells	o	Wells
F. Cost of Recovery well system (D x E)	o	\$	o	o	o	\$	o	\$	o	\$	o	\$
<b>*Total Well Installation Cost (3C + 3F)</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>
4. Administrative Cost:												
A. Annual cost for record-keeping and report preparation	5,500	\$	5,500	\$	5,500	\$	5,500	\$	9,000	\$	9,000	\$
<b>* Annual Administrative Cost (4A)</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>5,500</b>	<b>\$</b>	<b>9,000</b>	<b>\$</b>	<b>9,000</b>	<b>\$</b>
5. Inspection and Maintenance Cost for the Monitoring Program:												
A. Operator's time (hours) on-site for inspections and maintenance per year	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr	o	hour/yr
B. Charge or salary per hour	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr	o	\$/hr
C. Charge per hour	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr
D. Replacement of parts and equipment per year	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr	o	\$/yr
<b>* Annual Inspections / Maintenance Cost for the Groundwater Monitoring Program (5C + 5D)</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>	<b>o</b>	<b>\$</b>

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**Table XI.E.3. – Financial Assurance Summary**

Annual Off-Site Liquid Treatment / Disposal Cost	\$ 460,000	
Annual On-Site Treatment / Disposal Cost	\$ 27,500	
Annual Inspection / Maintenance / Operation Cost For The Corrective Action Program	\$ 127,800	
Annual Groundwater Monitoring Cost	\$ <del>116,475</del> 120,580	
Annual Administrative Cost	\$ 40,000	
Annual Inspection And Maintenance Cost For The Groundwater Monitoring Program ( <b>Included in Annual Inspection/Maintenance for Corrective Action Program</b> )	\$ 0	
<b>Annual Sub Total</b>	<b>\$ <del>775,880</del>1,475</b>	
Total Years Used For Calculating Financial Assurance	11	Yrs
Remediation Cost (Annual Sub Total x Total Years Used)	\$ <del>8,534,680</del> 486,225	
On-Site Waste Water Treatment System Capital Cost	\$ 0	
Total Well Cost	\$ 0	
10% Contingency	\$ <del>853,468</del> 48,623	
<b>Grand Total Cost (nearest \$1000)</b>	<b>\$ <del>9,388,148</del>54,848</b>	