



EXECUTIVE SUMMARY

The designated property is 21.5656 acres located at 2601 Spenwick Drive in Houston, Harris County, Texas. The property consists of land improved with 243,000 square feet of office/warehouse buildings. Figures depicting the designated property, the flood plain, a site plan of the designated property (including site boundaries and monitor well locations), gradient maps, and concentration maps are included in Appendix B. The site was purchased by The RectorSeal Corporation (RectorSeal) in May 1997. RectorSeal manufactures air conditioning and refrigeration products, as well as plumbing and soldering related products, lubricants, penetrants, caulks and specialty sealants. The general land use surrounding the site is commercial/industrial. The designated site is bound by commercial properties on the south and west, Spenwick Drive on the east, and Brickhouse Gulley and Southern Pacific Railroad tracks on the north.

Prior to RectorSeal purchasing the property, a Phase I Environmental Site Assessment (ESA) was conducted in October 1996. The ESA noted that a previous owner had installed a PST on-site in July 1992 and a release from the PST was discovered in August 1992. The tank was removed and the site was granted closure in 1993.

Based on the possibility of impact from the identified release, an environmental site investigation was conducted for RectorSeal in 1997. Results of the investigation identified chlorinated hydrocarbons in groundwater at concentrations above Texas Commission on Environmental (TCEQ) Action Levels. RectorSeal entered the site into the TCEQ Voluntary Cleanup Program (VCP) in August 1997 (VCP ID No. 613).

Site assessment activities completed under the VCP have delineated the vertical and lateral extent of affected groundwater. Assessment activities have included the installation and sampling of 35 groundwater monitoring wells to evaluate four groundwater bearing-units, and 14 years of quarterly groundwater monitoring (1997 to 2011).

Three affected water-bearing units were identified on-site. The upper water-bearing unit (Zone A) consists of two interconnected relatively low water producing zones (interbedded silty clay and clayey silt) encountered approximately 10 to 18 feet below ground surface (bgs) and 23 to 24 feet bgs, respectively. The second water-bearing unit (Zone B) is also a relatively low water producing zone (clayey silt, silty clay and silt) encountered approximately 30 to 34 feet bgs. The third affected groundwater-bearing (Zone C) is a moderately productive water-bearing zone (clayey silt and silty sand) with groundwater water being encountered approximately 37 to 38 feet bgs. The three affected water-bearing units are impacted with trichloroethene (TCE), 1,2-dichloroethene (1,2-DCE) and vinyl chloride. The plume is delineated vertically and laterally,



and is contained on-site. Fourteen years of quarterly groundwater monitoring data demonstrate that the groundwater plume is stable or decreasing in concentration.

The applicant's current plan for the designated property is to obtain regulatory closure through the TCEQ VCP. Upon approval of the MSD Ordinance by the City of Houston for this designated property, a TCEQ MSD Application will be completed and submitted to the TCEQ for approval. With an MSD, COCs in the groundwater at the affected property will not exceed the residential assessment level for the groundwater ingestion pathway. An Affected Property Assessment Report (APAR) will then be prepared based on MSD applicable PCLs and submitted to the TCEQ to obtain a VCP Certificate of Completion.

APPENDIX B

A site map showing:

- a. The location of the designated property.*
- b. The topography of the designated property as indicated on publicly available sources, which must note the watershed and whether the designated property is located in a floodplain or floodway, as those terms are defined in Chapter 19 of the Code.*
- c. The detected area of groundwater contamination.*
- d. The location of all soil sampling locations and groundwater monitoring wells.*
- e. Groundwater gradients, to the extent known, and direction of groundwater flow.*
- f. The ingestion protective concentration level exceedence zone for each contaminant of concern, to the extent known.*

Attached Figures

Figure 1 - Aerial Photograph Showing Site Boundaries

Figure 1-1 - Site Vicinity Map

Figure 2-1 - Detected Area of Groundwater Contamination, Water-Bearing Zone A

Figure 2-2 - Detected Area of Groundwater Contamination, Water Bearing Zone B

Figure 2-3 - Detected Area of Groundwater Contamination, Water Bearing Zone C

Figure 3 - Monitor Well Locations

Figure 4-1 - Groundwater Gradient Map - January 19, 2011, Water Bearing Zone A

Figure 4-2 - Groundwater Gradient Map - January 19, 2011, Water Bearing Zone B

Figure 4-3 - Groundwater Gradient Map - January 19, 2011, Water Bearing Zone C

Figure 5-1 - Trichloroethene Concentration Map, Water Bearing Zone A

Figure 5-2 - cis-1,2-Dichloroethene Concentration Map, Water Bearing Zone A

Figure 5-3 - Vinyl Chloride Concentration Map, Water Bearing Zone A

Figure 5-4 - Trichloroethene Concentration Map, Water Bearing Zone B

Figure 5-5 - cis-1,2-Dichloroethene Concentration Map, Water Bearing Zone B

Figure 5-6 - trans-1,2-Dichloroethene, Water Bearing Zone B

Figure 5-7 - Vinyl Chloride Concentration Map, Water Bearing Zone B

Figure 5-8 - Trichloroethene Concentration Map, Water Bearing Zone C

Figure 5-9 - cis-1,2-Dichloroethene Concentration Map, Water Bearing Zone C

Figure 5-10 - Vinyl Chloride Concentration Map, Water Bearing Zone C

JANUARY 8, 2009 AERIAL PHOTOGRAPH COURTESY OF THE TEXAS NATURAL RESOURCE INFORMATION SYSTEM (TNRIS). <http://www.tnr.is.org/>
HARRIS COUNTY APPRAISAL DISTRICT (HCAD) PARCEL BOUNDARIES, COURTESY OF THE CITY OF HOUSTON GEOGRAPHICAL INFORMATION SYSTEM (GIMS). JUNE 30, 2010. <http://www.gims.houston.tx.gov/PortalWS/MainPortal.aspx>



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LEGEND	
	SITE BOUNDARY
	HCAD PARCEL BOUNDARY

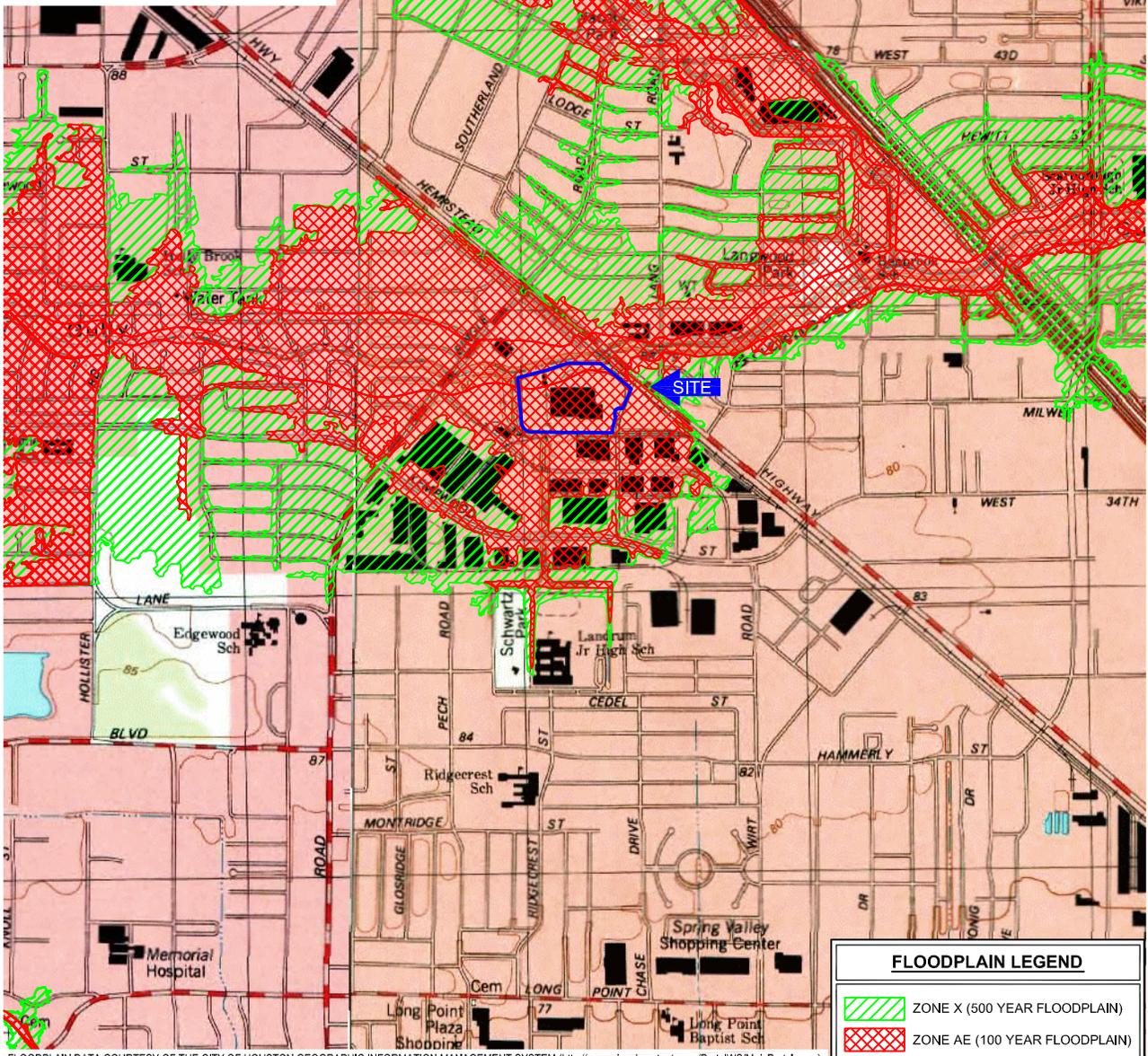
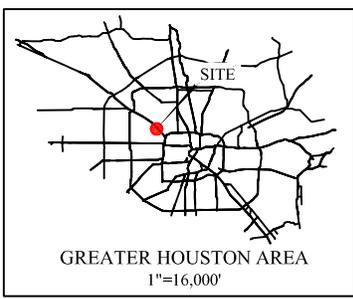


APPROXIMATE SCALE: 1" = 200'



Figure 1
Aerial Photograph Showing Site Boundaries
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

DRAWN BY: REW	SCALE: AS SHOWN	TERRACON NO:
CHECKED BY: EWJ	DATE: 1-4-2012	92117578



FLOODPLAIN LEGEND	
	ZONE X (500 YEAR FLOODPLAIN)
	ZONE AE (100 YEAR FLOODPLAIN)

FLOODPLAIN DATA COURTESY OF THE CITY OF HOUSTON GEOGRAPHIC INFORMATION MANAGEMENT SYSTEM (<http://www.gims.houston.tx.gov/PortalWS/MainPortal.aspx>).

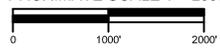
USGS TOPOGRAPHIC QUADRANGLE MAP

Houston Heights, Texas



Topographic Map Revised: 1995

APPROXIMATE SCALE 1"= 2000'



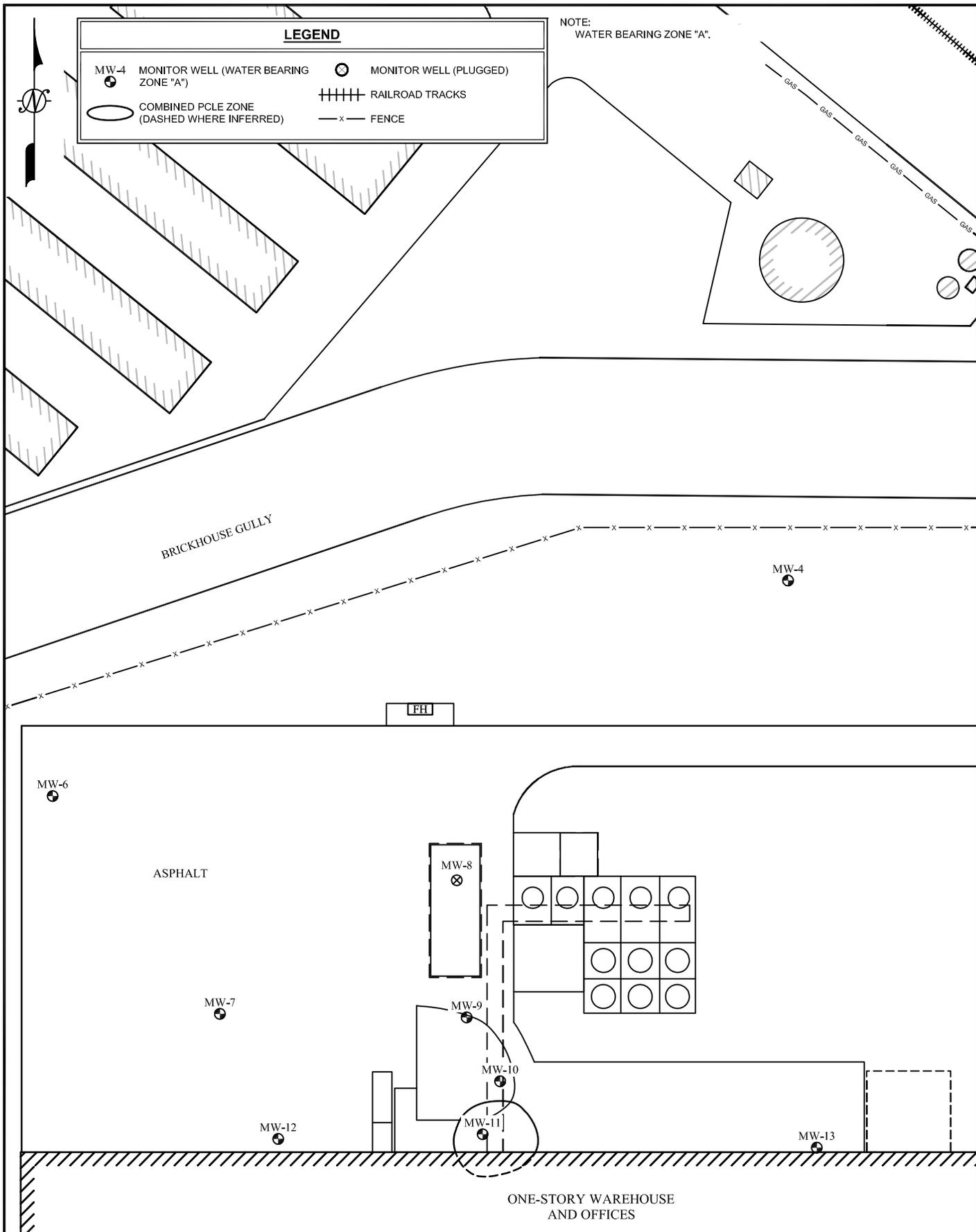
The RectorSeal Corporation
2601 Spenwick
Houston, Texas
TERRACON PROJECT NO. 92117578

Prepared By: _____ REW
Approved By: _____ MHN

FIGURE 1-1:
SITE VICINITY MAP

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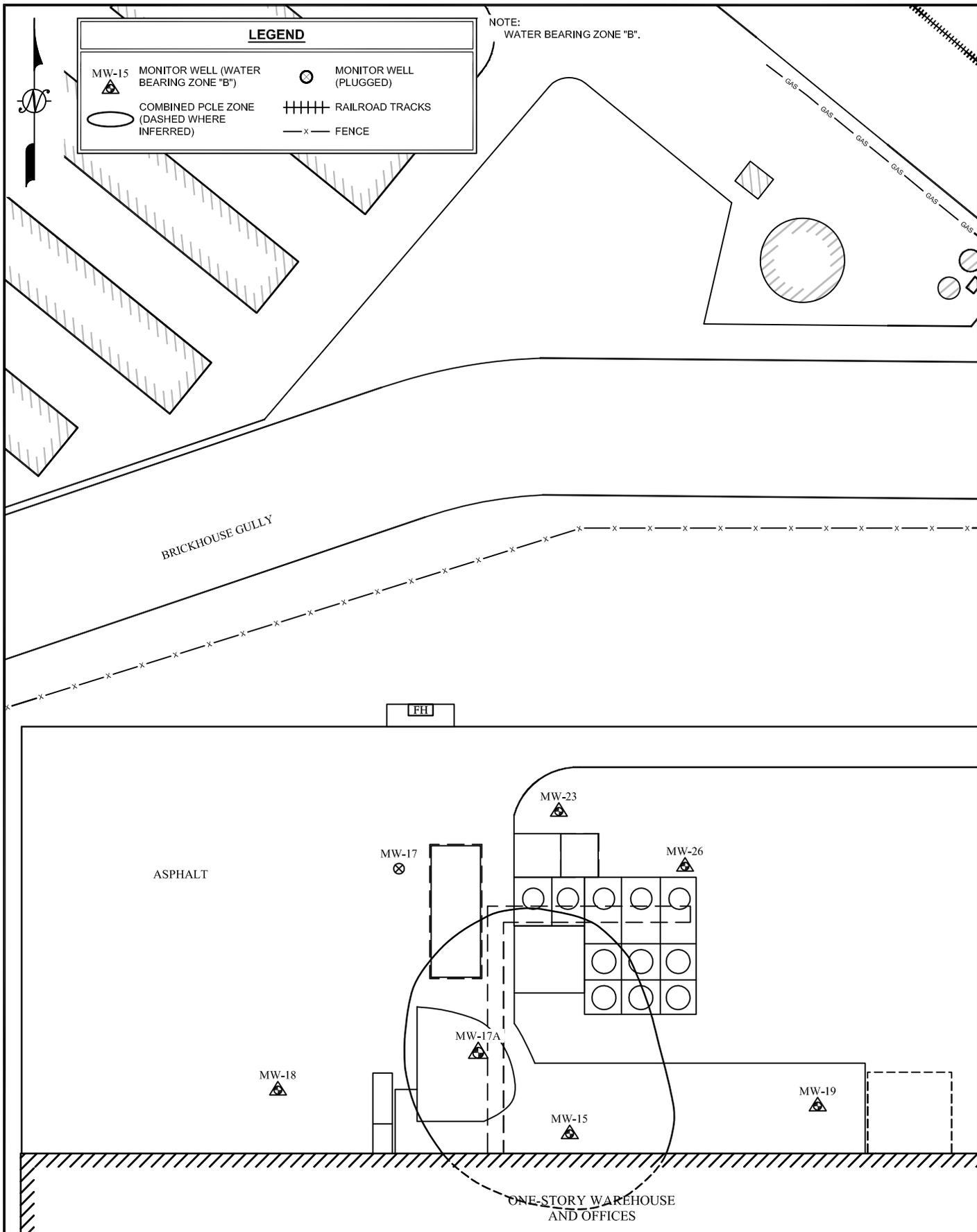


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DRAWN BY: REW
 CHECKED BY: EWJ
 SCALE: AS SHOWN
 DATE: 2-1-2012

Figure 2-1
Detected Area of Groundwater Contamination
 January 2011
 Water Bearing Zone A
 The RectorSeal Corporation
 2601 Spenwick
 Houston, Texas

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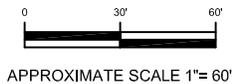
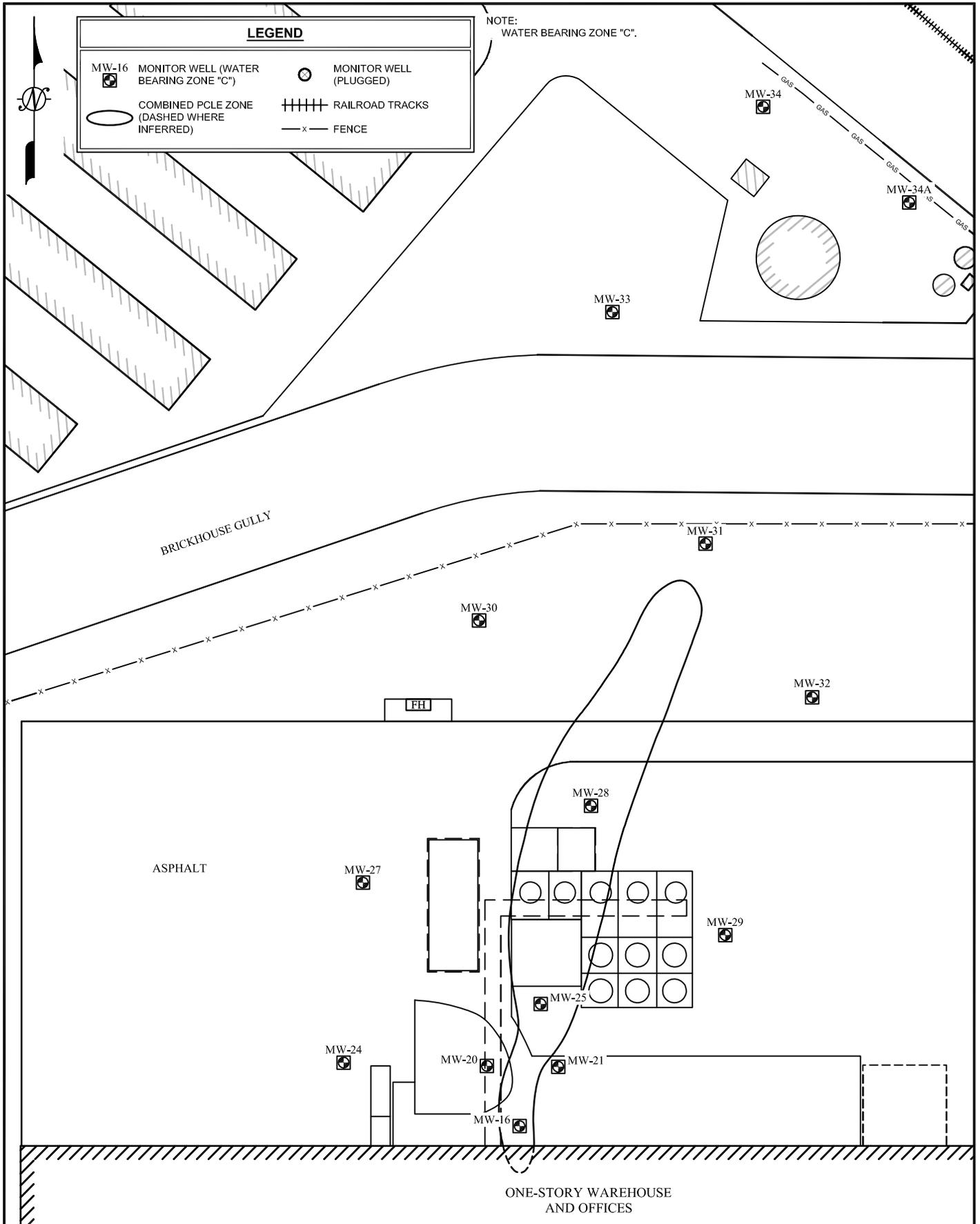
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Consulting Engineers & Scientists

TERRACON NO: 92117578

DRAWN BY: REW
CHECKED BY: EWJ
SCALE: AS SHOWN
DATE: 2-1-2012

Figure 2-2
Detected Area of Groundwater Contamination
January 2011
Water Bearing Zone B
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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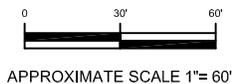
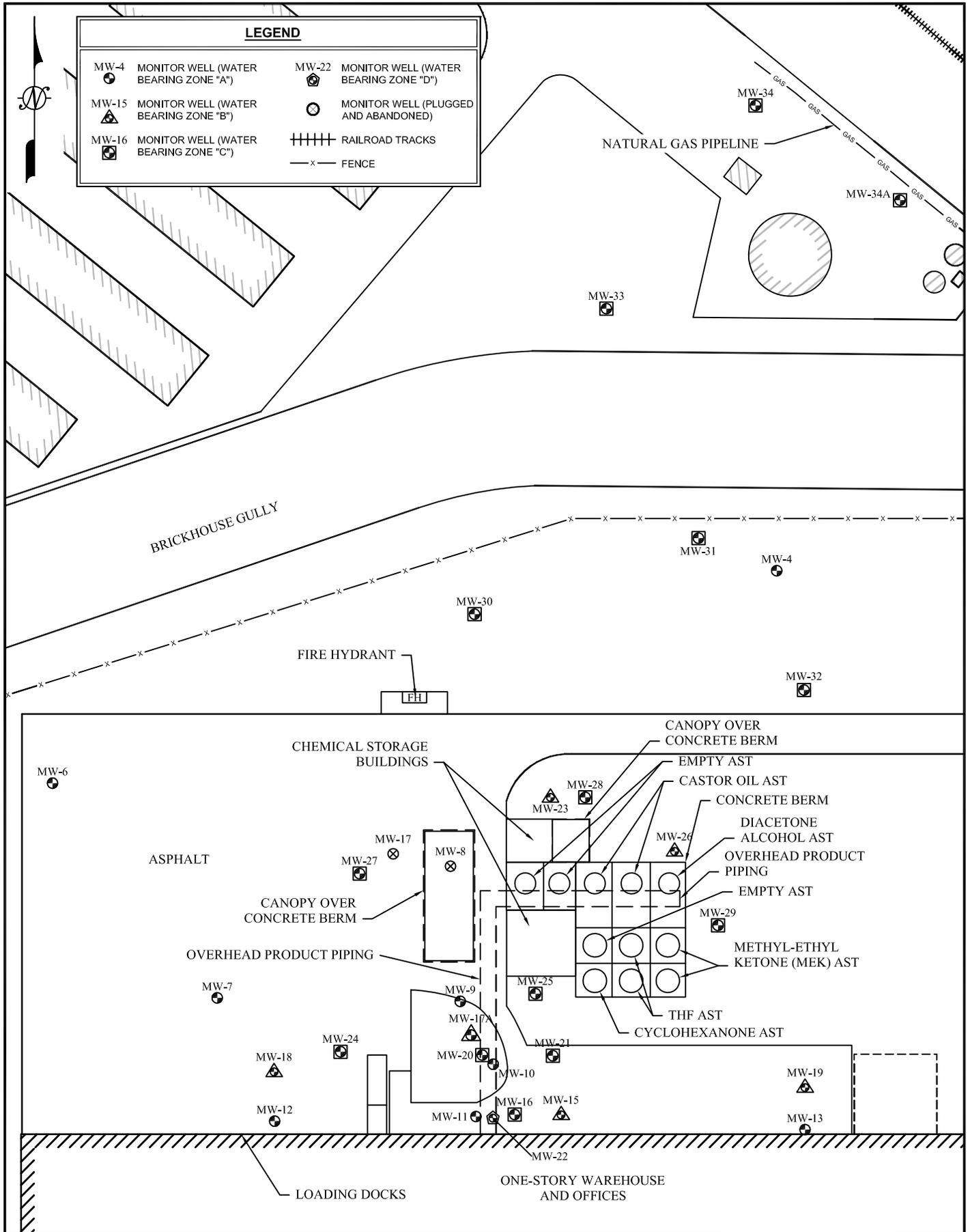
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CHECKED BY: EWJ
SCALE: AS SHOWN
DATE: 2-1-2012

Figure 2-3
Detected Area of Groundwater Contamination
January 2011
Water Bearing Zone C
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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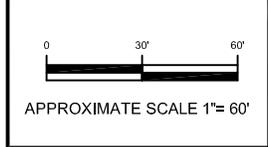
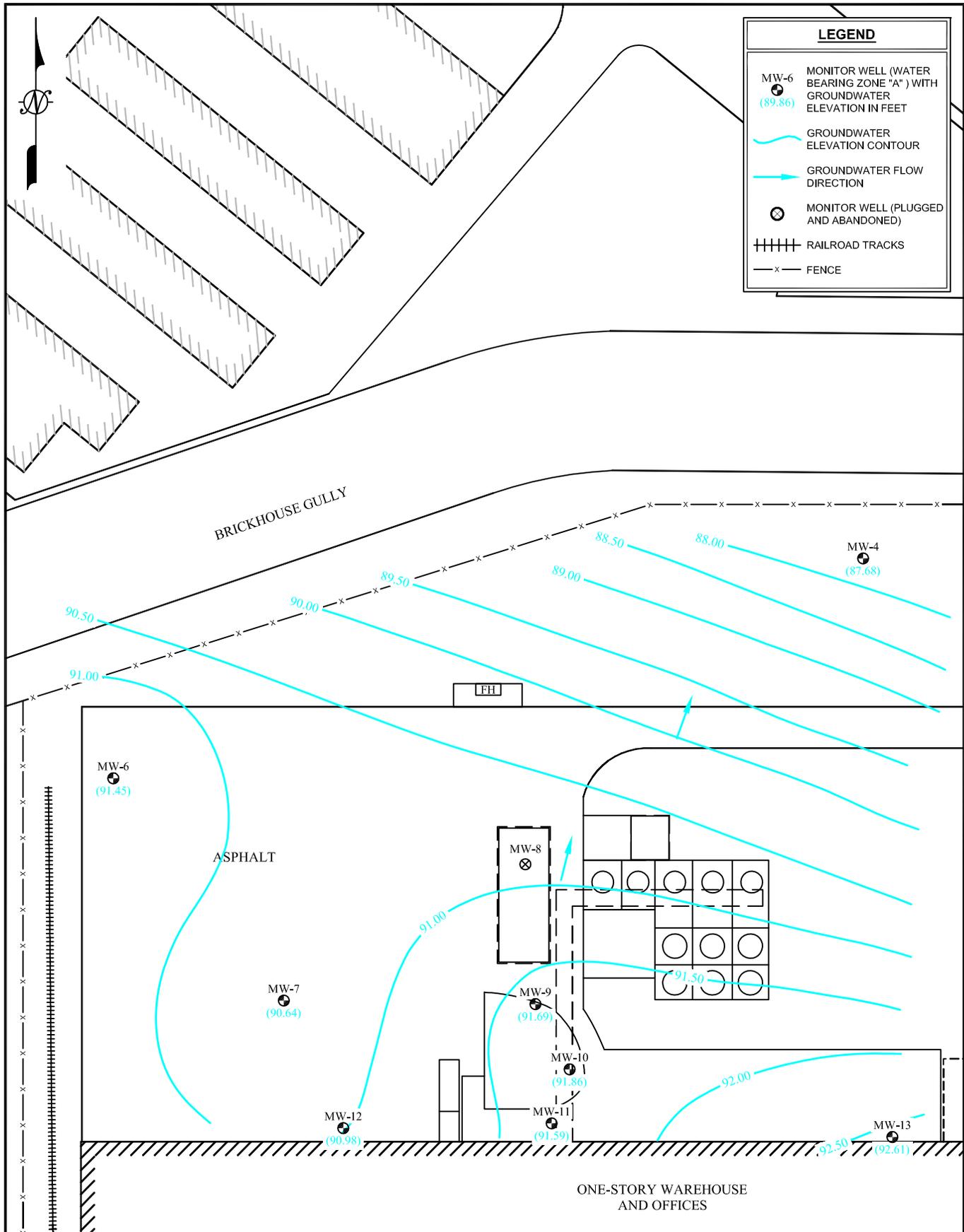
CHECKED BY: EWJ

SCALE: AS SHOWN

DATE: 2-1-2012

Figure 3
Monitor Well Locations
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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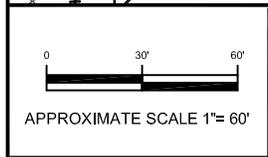
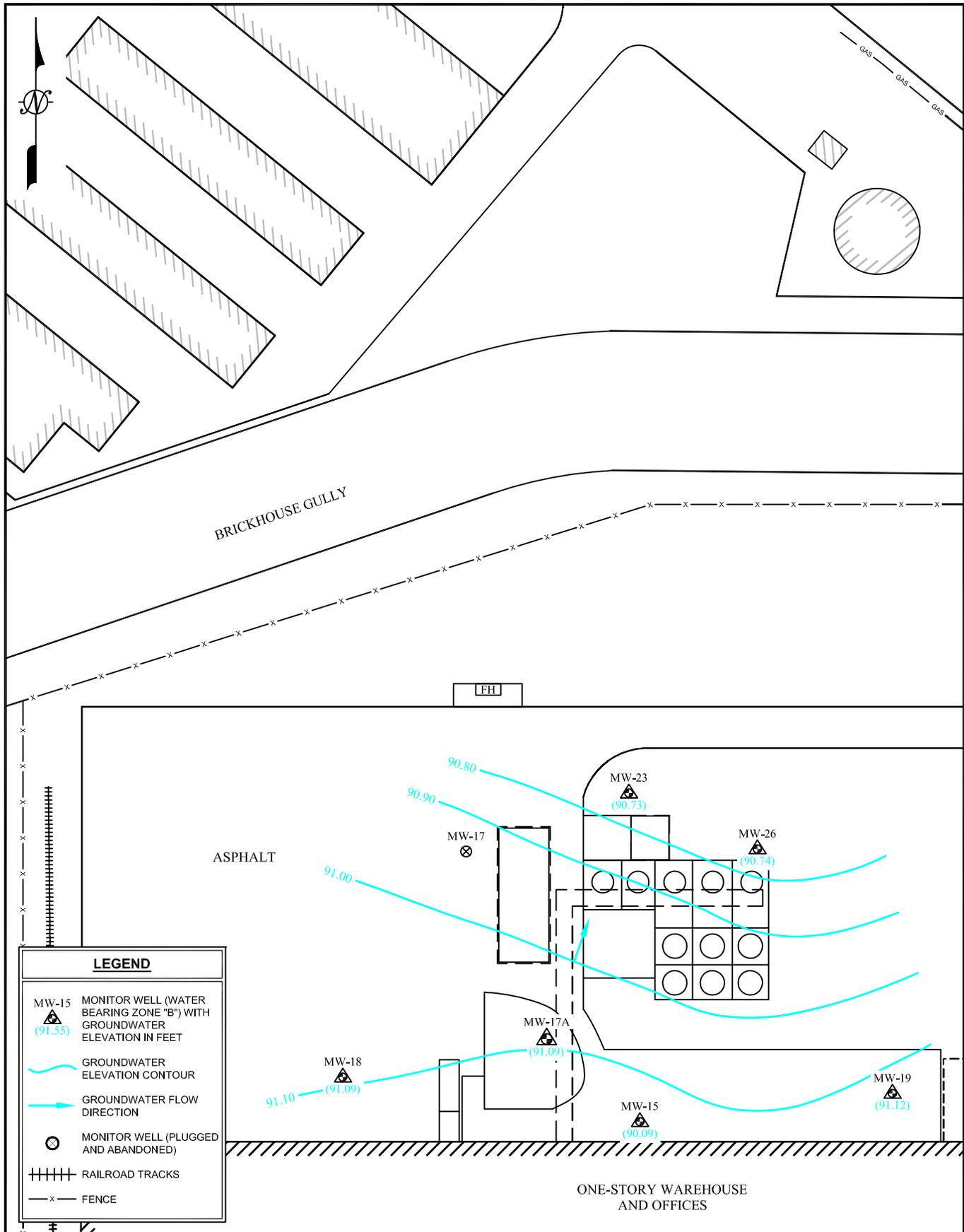
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CHECKED BY:	EWJ
SCALE:	AS SHOWN
DATE:	2-1-2012

Figure 4-1
Groundwater Gradient Map - January 19, 2011
Water Bearing Zone A
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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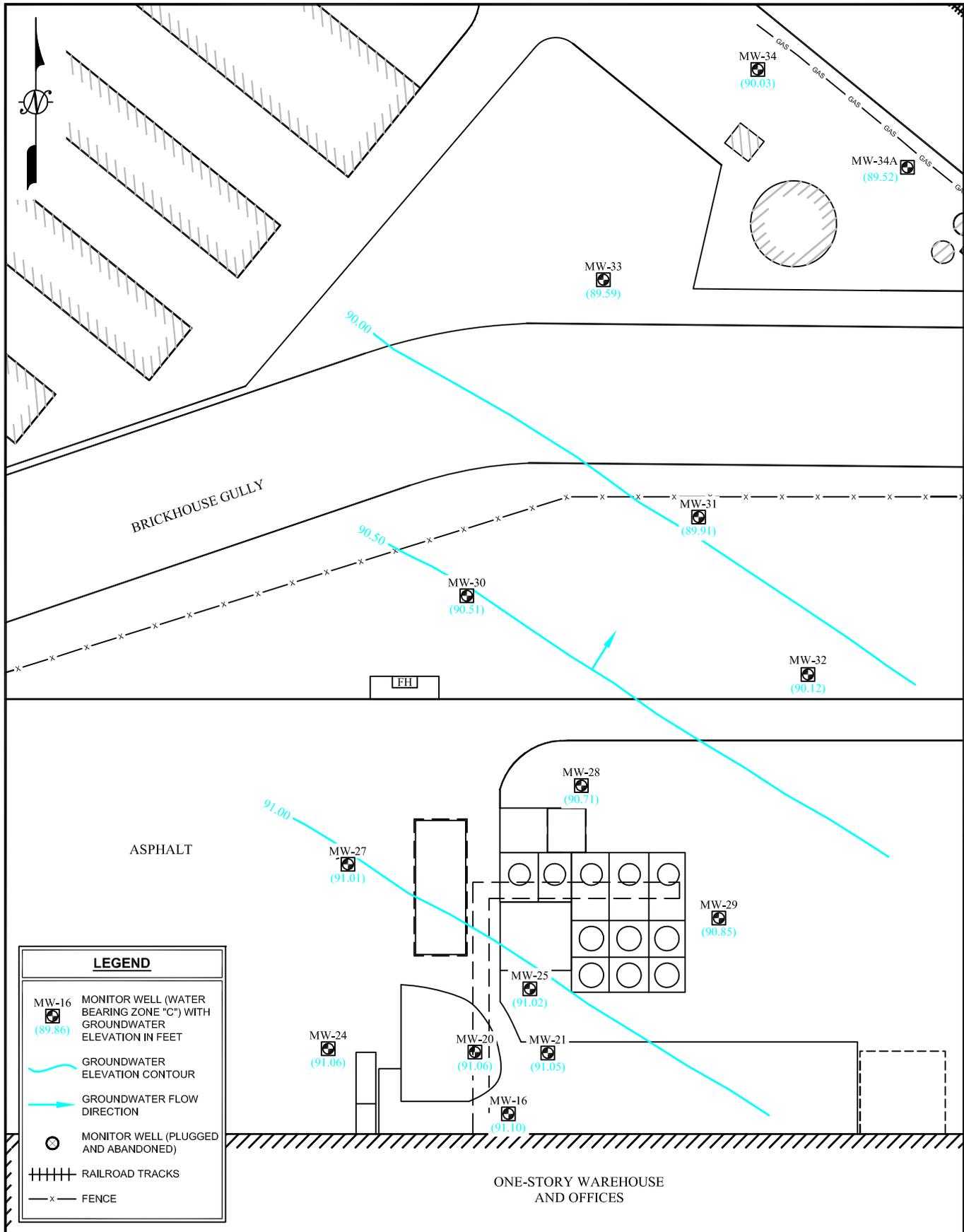
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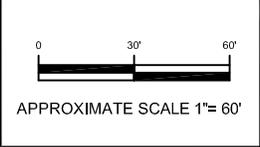
Figure 4-2
Groundwater Gradient Map - January 19, 2011
Water Bearing Zone B
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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LEGEND

- MW-16 (89.86) MONITOR WELL (WATER BEARING ZONE "C") WITH GROUNDWATER ELEVATION IN FEET
- GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- MONITOR WELL (PLUGGED AND ABANDONED)
- RAILROAD TRACKS
- FENCE



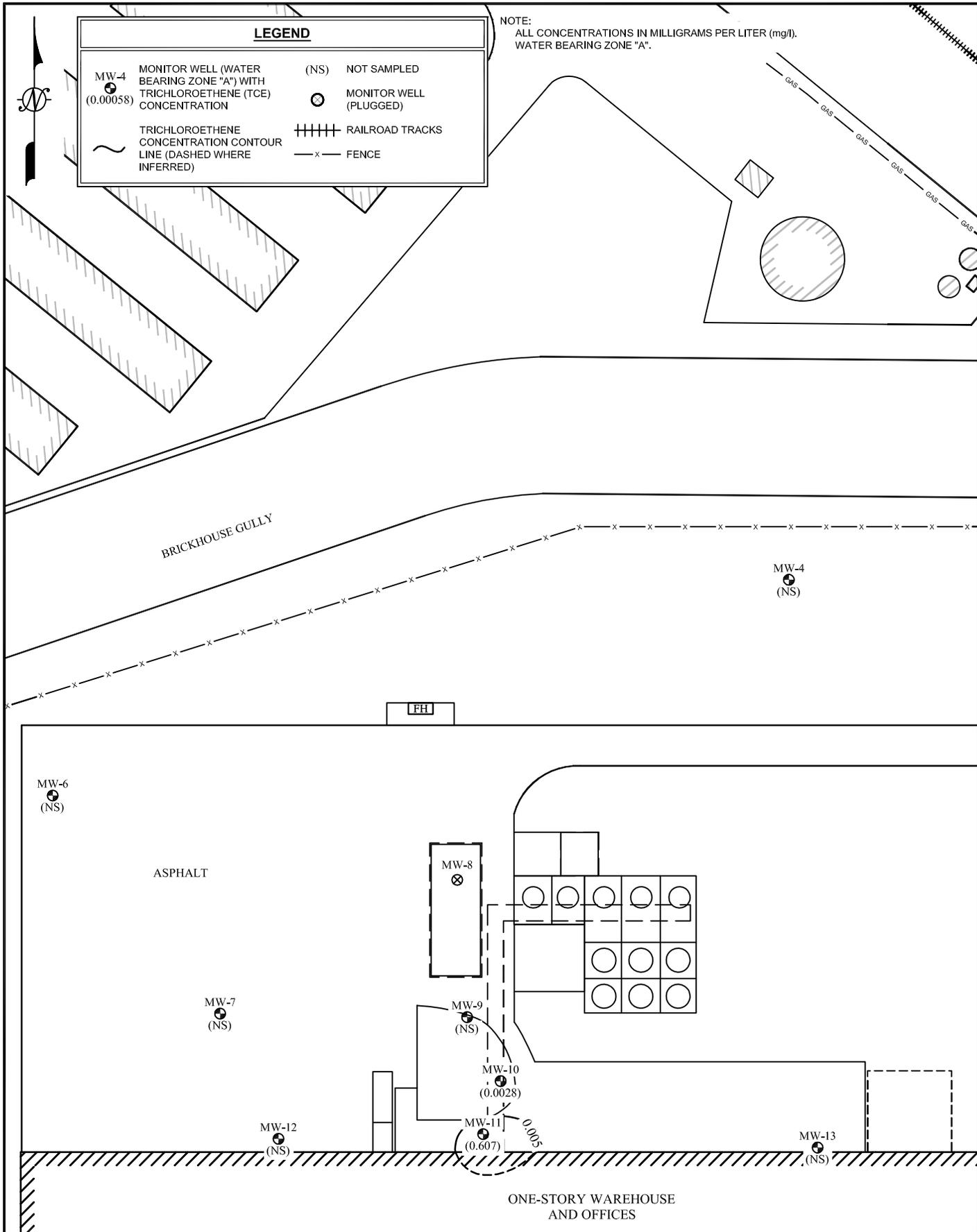
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SCALE:	AS SHOWN
DATE:	2-1-2012

Figure 4-3
Groundwater Gradient Map - January 19, 2011
 Water Bearing Zone C
 The RectorSeal Corporation
 2601 Spenwick
 Houston, Texas

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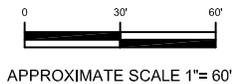
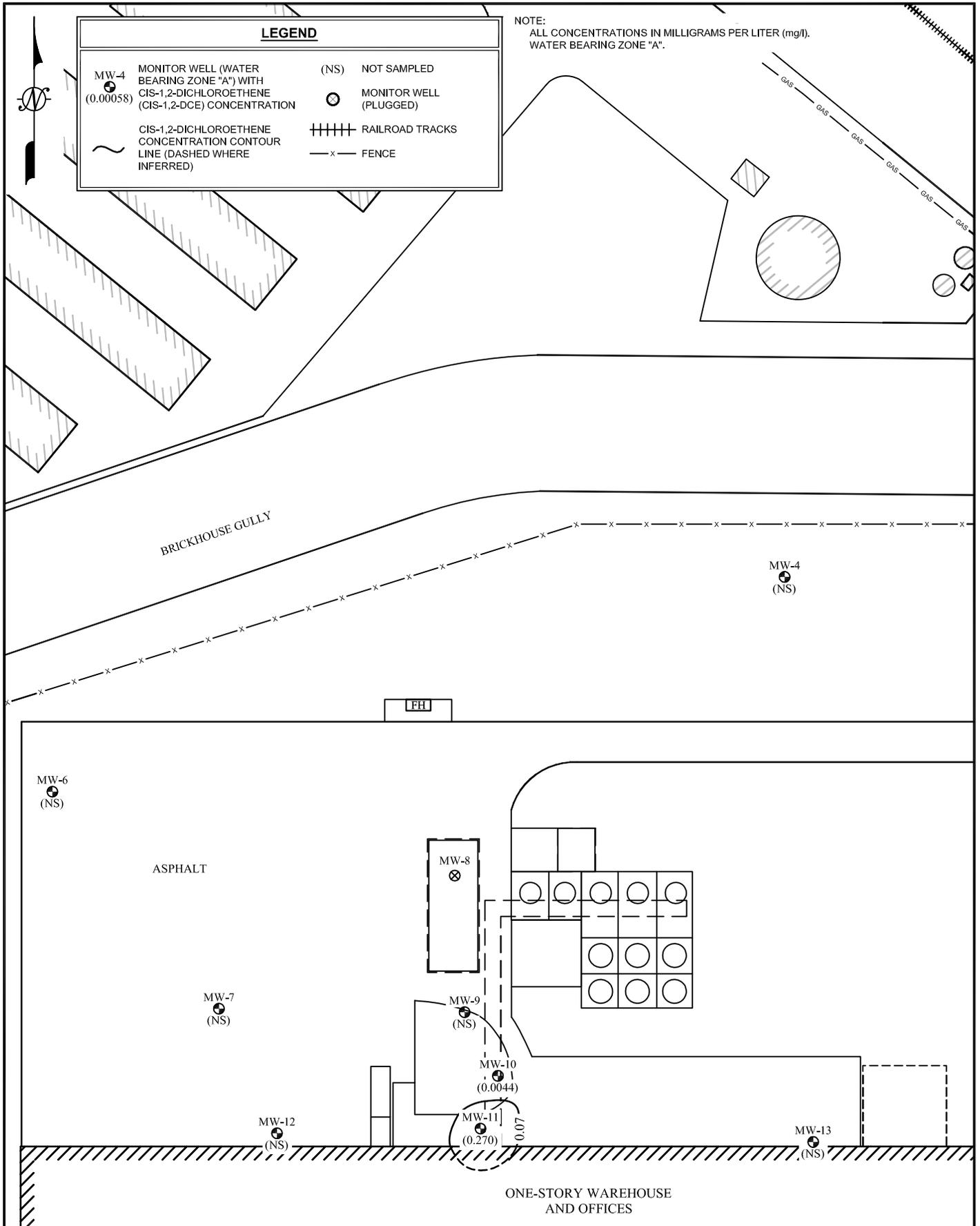
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DATE: 2-1-2012

Figure 5-1
Trichloroethene Concentration Map
January 2011
Water Bearing Zone A
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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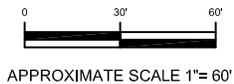
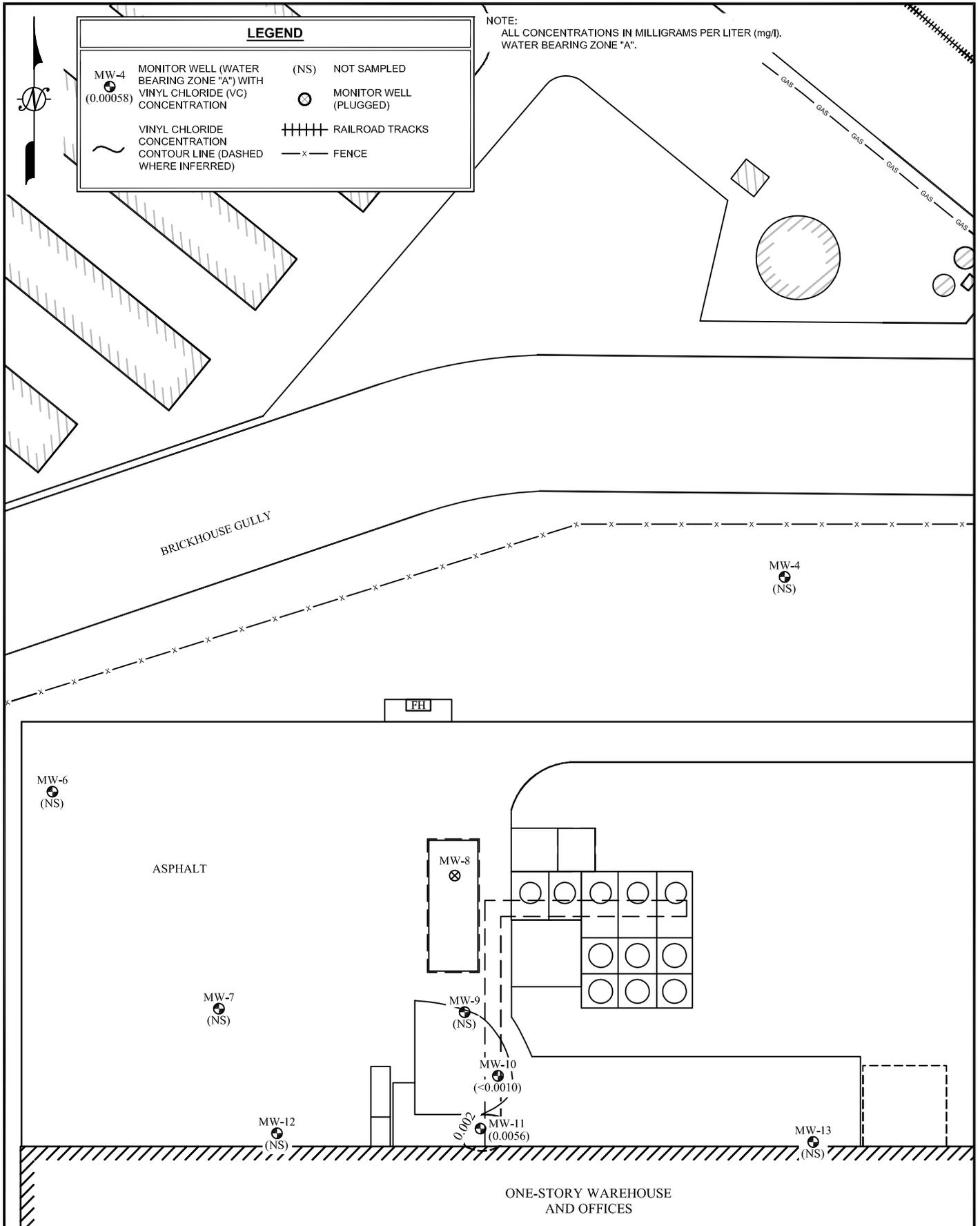
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SCALE:	AS SHOWN
DATE:	2-1-2012

Figure 5-2
cis-1,2-Dichloroethene Concentration Map
January 2011
Water Bearing Zone A
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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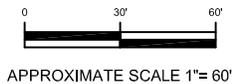
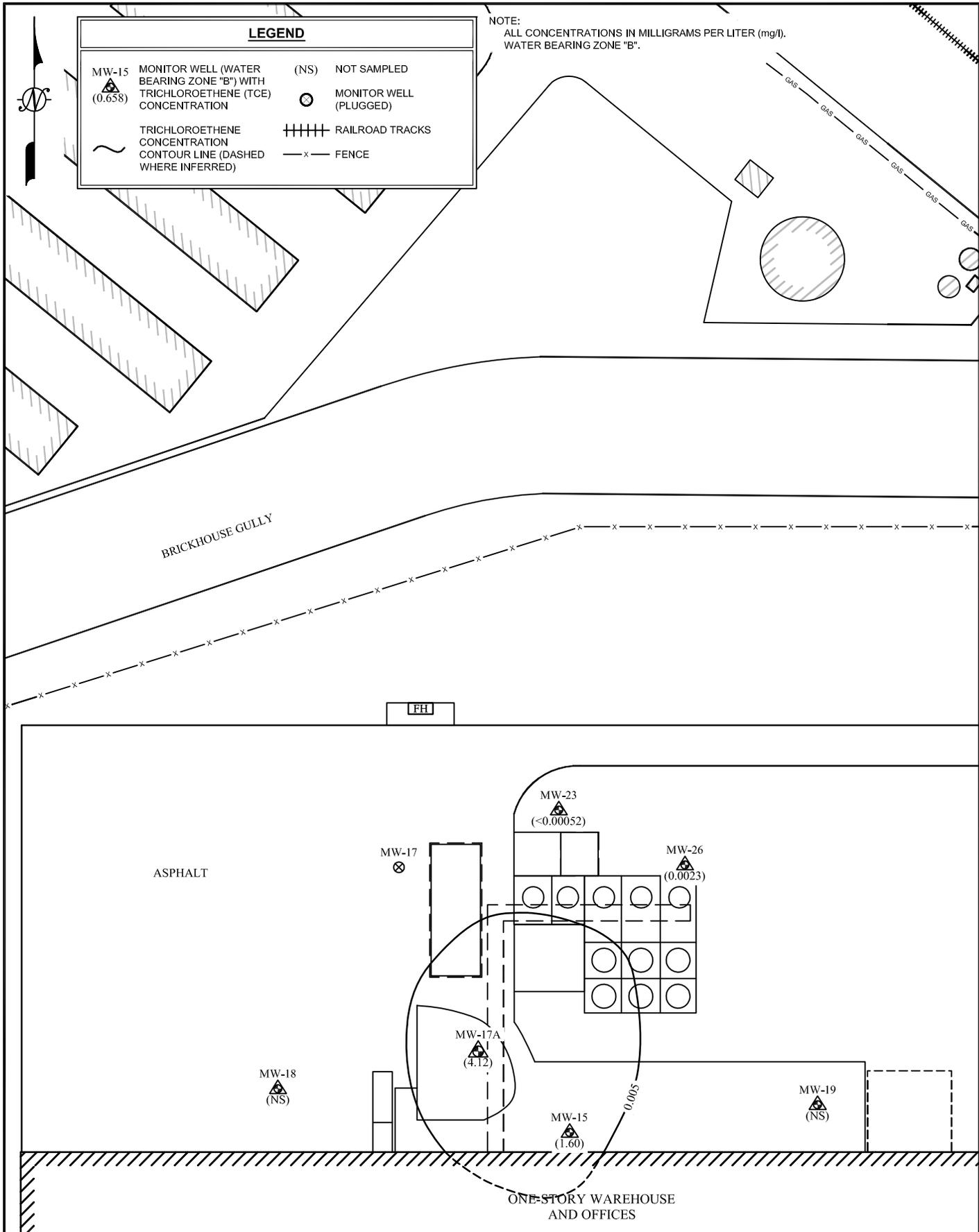
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DATE: 2-1-2012

Figure 5-3
Vinyl Chloride Concentration Map
January 2011
Water Bearing Zone A
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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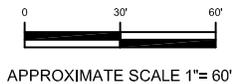
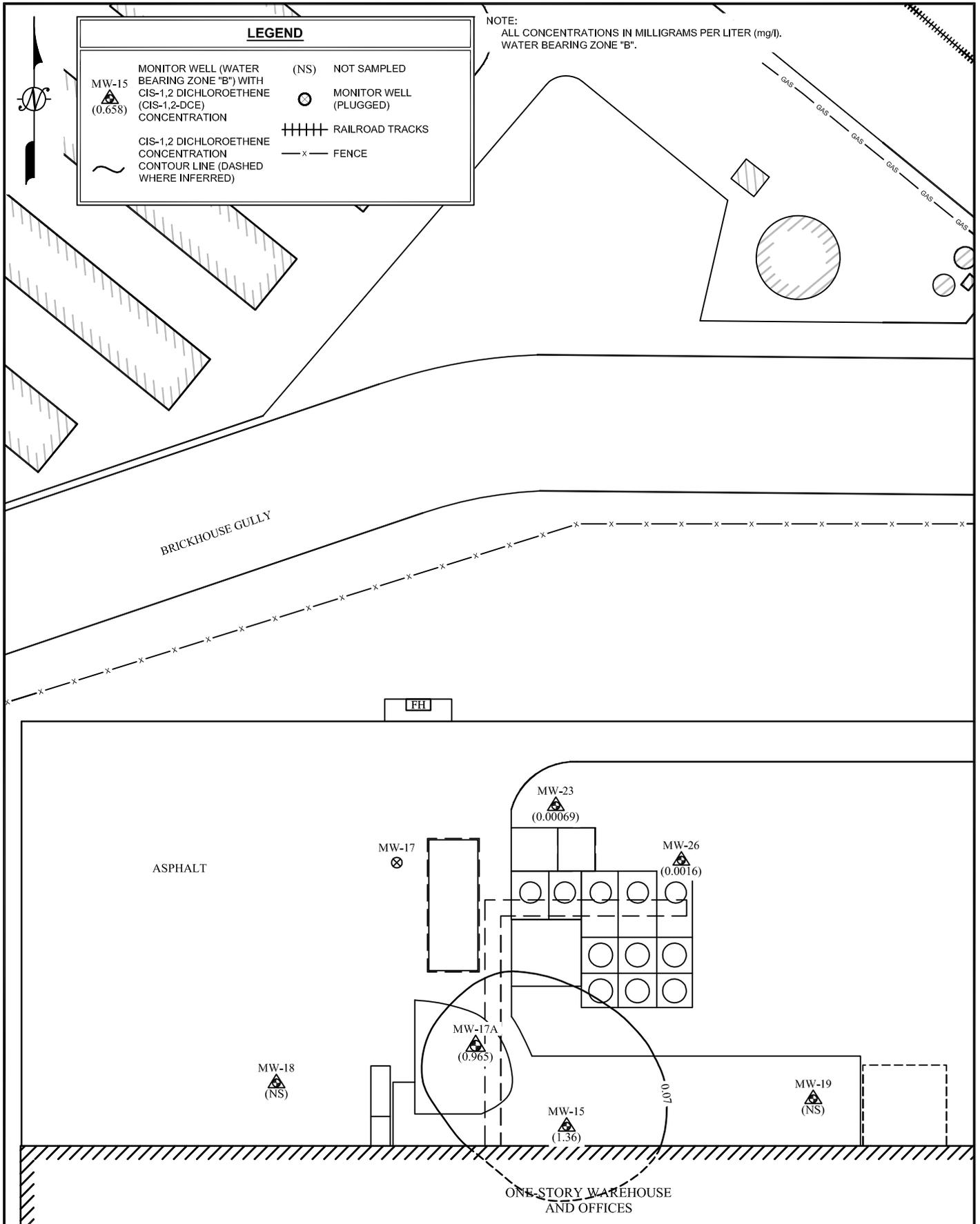
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SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-4
Trichloroethene Concentration Map
January 2011
Water Bearing Zone B
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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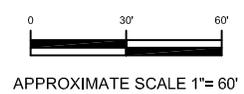
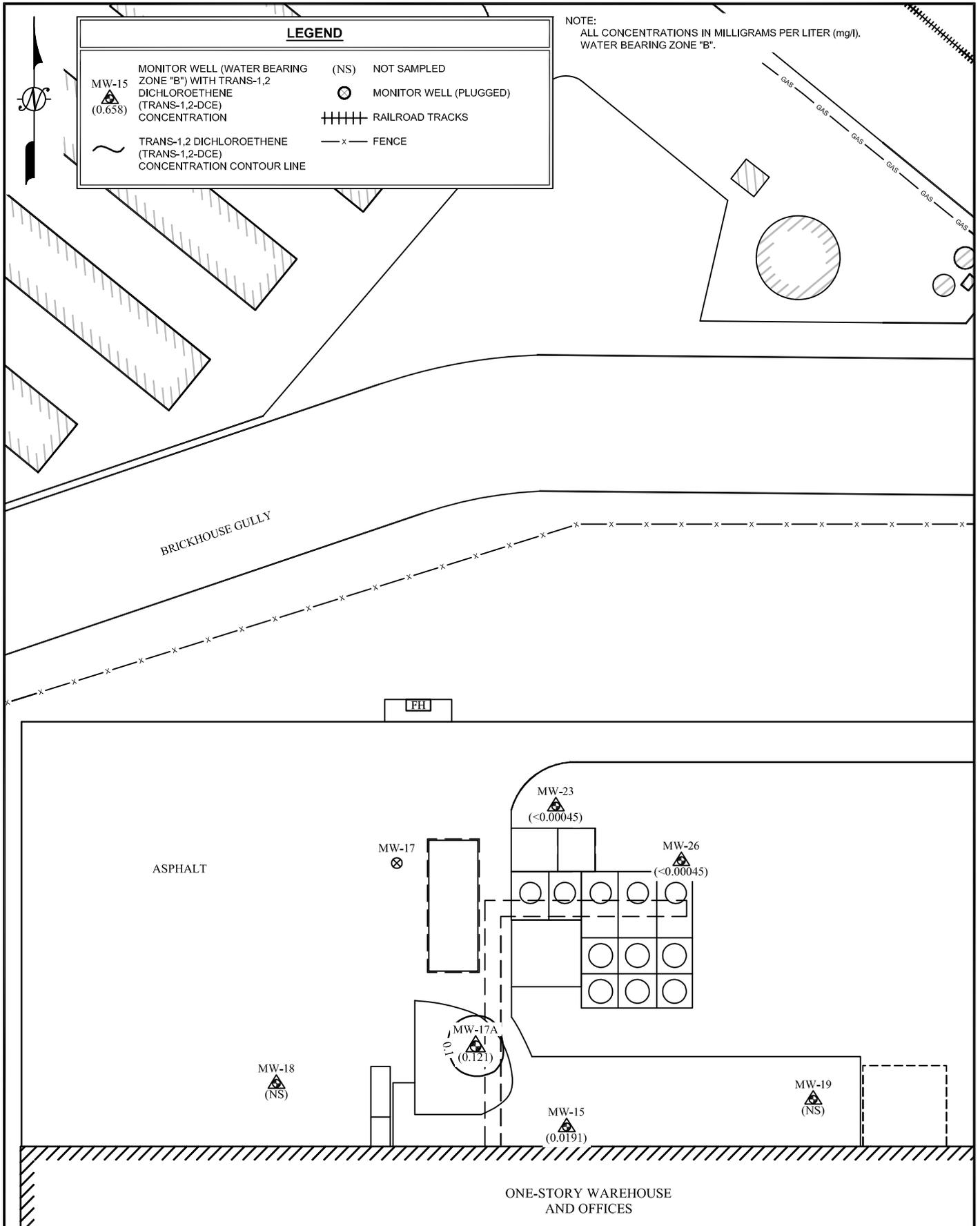
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SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-5
cis-1,2-Dichloroethene Concentration Map
January 2011
Water Bearing Zone B
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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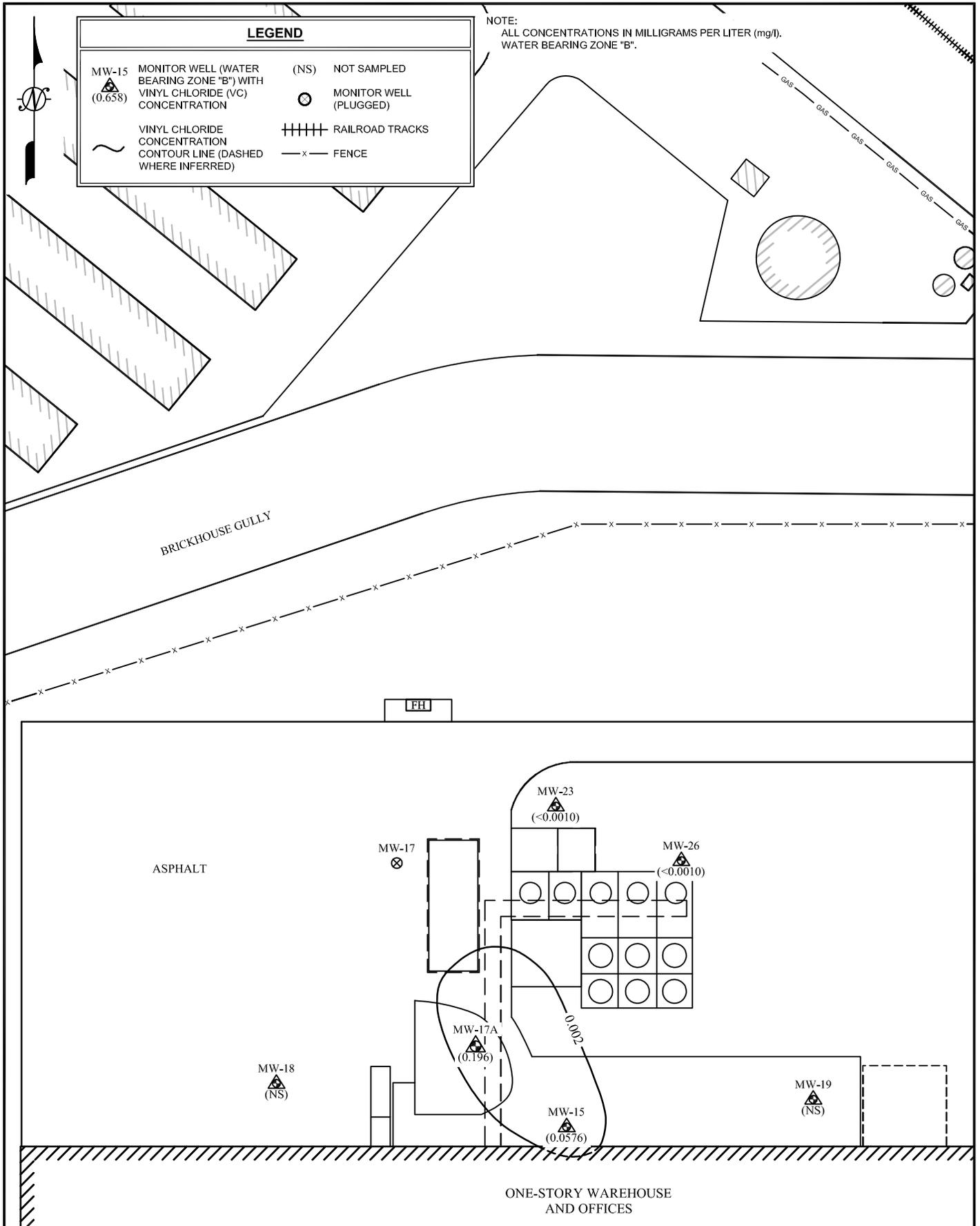


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CHECKED BY:	EWJ
SCALE:	AS SHOWN
DATE:	2-1-2012

Figure 5-6
trans-1,2-Dichloroethene Concentration Map
 January 2011
 Water Bearing Zone B
 The RectorSeal Corporation
 2601 Spenwick
 Houston, Texas

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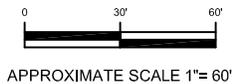
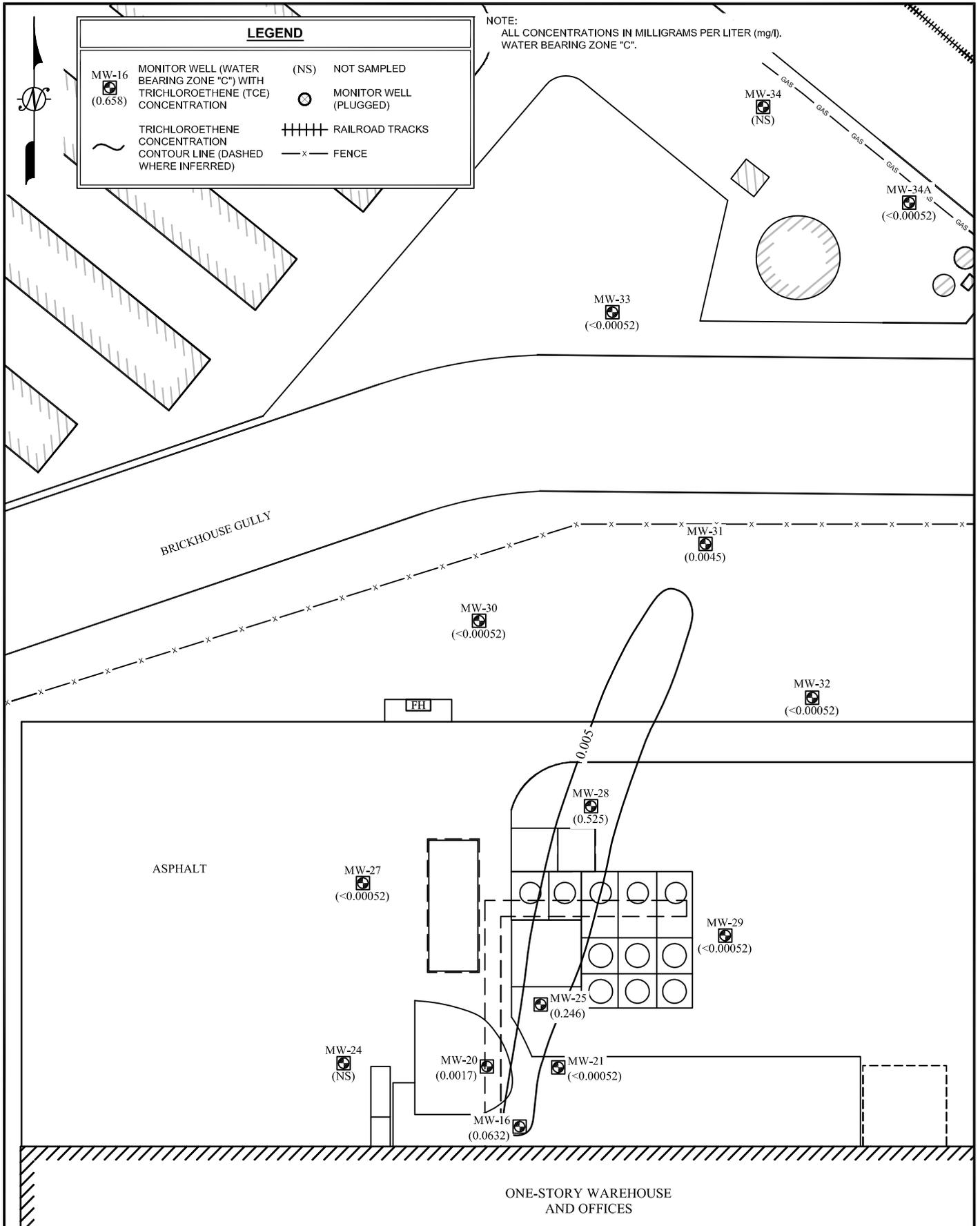
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CHECKED BY: EWJ
SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-7
Vinyl Chloride Concentration Map
January 2011
Water Bearing Zone B
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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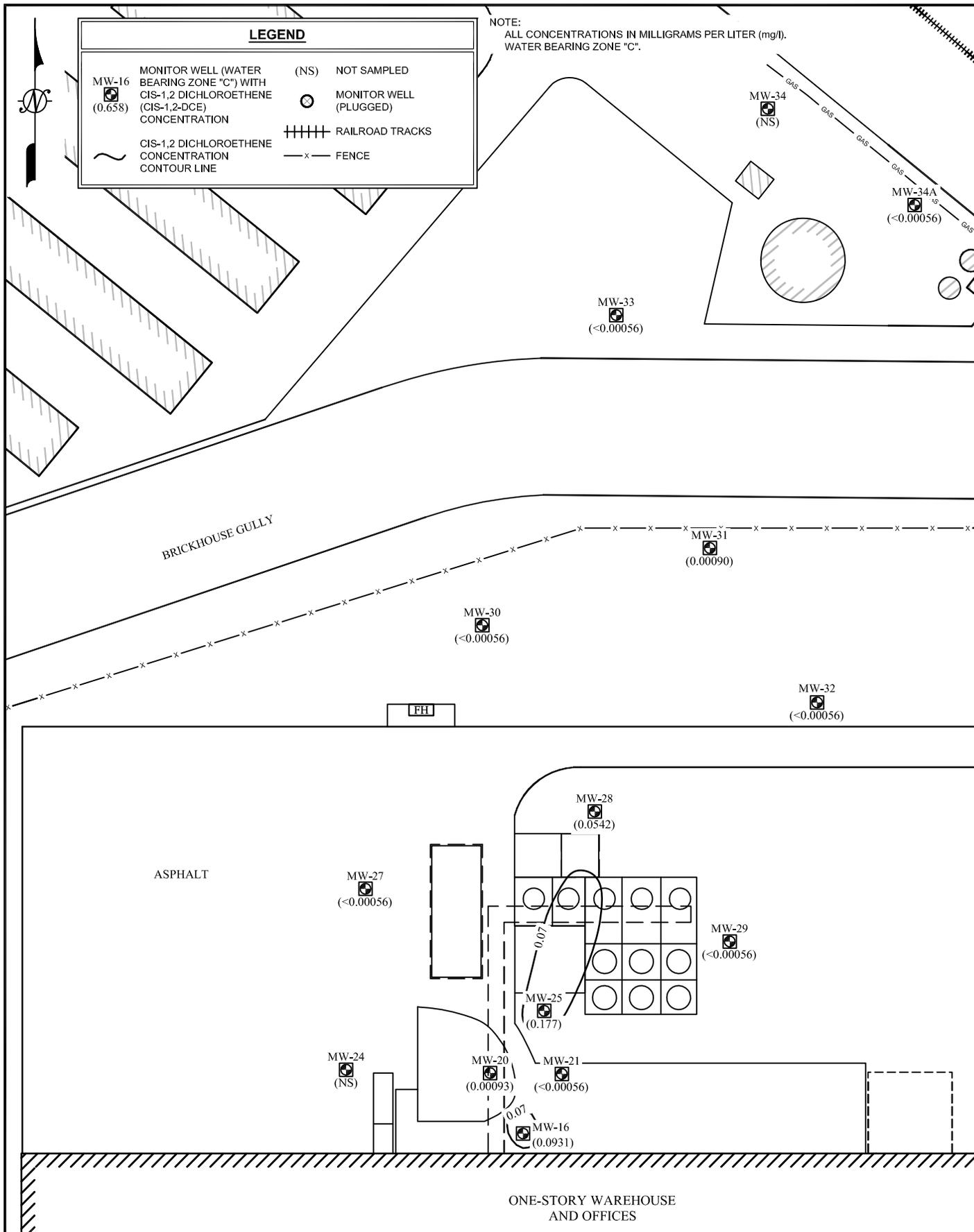
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Consulting Engineers & Scientists

TERRACON NO: 92117578

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CHECKED BY: EWJ
SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-8
Trichloroethene Concentration Map
January 2011
Water Bearing Zone C
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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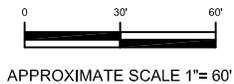
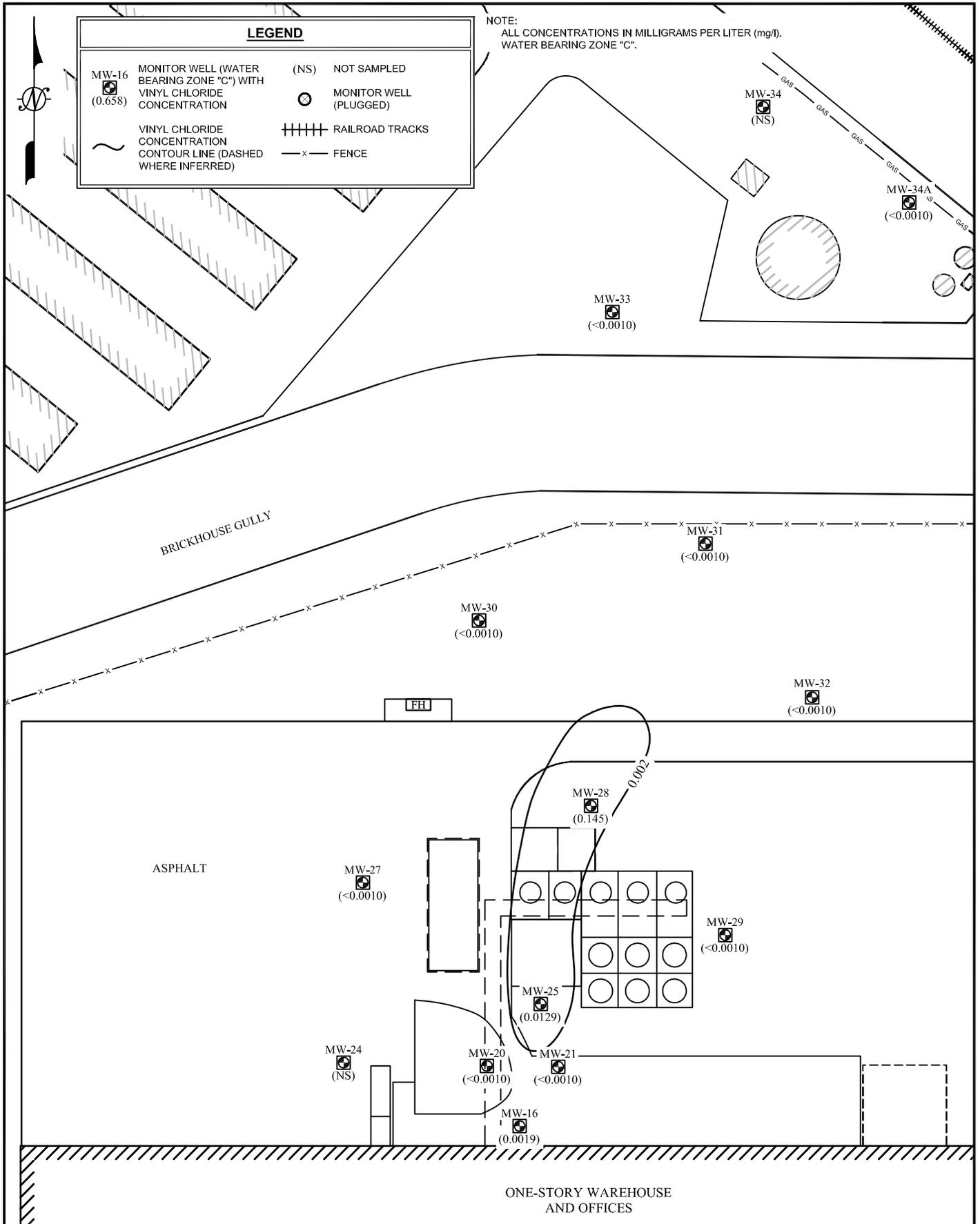
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TERRACON NO: 92117578

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CHECKED BY: EWJ
SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-9
cis-1,2-Dichloroethene Concentration Map
January 2011
Water Bearing Zone C
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

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Consulting Engineers & Scientists

TERRACON NO: 92117578

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SCALE: AS SHOWN
DATE: 2-1-2012

Figure 5-10
Vinyl Chloride Concentration Map
January 2011
Water Bearing Zone C
The RectorSeal Corporation
2601 Spenwick
Houston, Texas

APPENDIX C

A description of the current land use, and, to the extent known, the anticipated use(s), of the designated property and properties within 500 feet of the boundary of the designated property.

The designated property is commercial/industrial. All adjacent properties and properties within 500 feet of the designated property are also commercial/industrial.

The properties within 500 feet of the designated property include:

Northeast: Brickhouse Gulley
 The City of Houston
 Southern Pacific Railroad
 Hempstead Highway

Northwest: Spenwick Industrial, LTD

West: Carl E. Pollex
 DBD Corporation

South: Epochs Real Estate Partners
 Shius Investment LLC

Southwest: CCP LTD

Southeast: Houston Industrial Warehouse

In the future, the surrounding properties will most likely remain commercial/industrial. Future plans for the designated property are to remain commercial/industrial under ownership of RectorSeal Corporation.

APPENDIX D

For each contaminant of concern within the ingestion protective concentration level exceedence zone, to the extent known, provide the following:

- a. A description of the ingestion protective concentration level exceedence zone and the non-ingestion protective concentration level exceedence zone, including a specification of the horizontal area and the minimum and maximum depth below ground surface.*
- b. The level of contamination, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L units.*
- c. Its basic geochemical properties (e.g., whether the contaminant of concern migrates with groundwater, floats or is soluble in water.)*

- (a) See the figures in Appendix B and Tables 1 through 3.
- (b) See Tables 1 through 3
- (c) See Tables 1 through 3

Based on the environmental investigations completed at the designated property, four COCs have been identified in the groundwater above the ingestion PCL. Tables 1 through 3 list the COCs exceeding the ingestion PCLs in groundwater in water bearing zones A, B, and C, respectively.

The concentrations of COCs identified in the groundwater in the designated property are all below the applicable non-ingestion PCLs ($^{Air}GW_{inh-v}$).

APPENDIX D (Water Bearing Zone A)

TABLE 1: COCs EXCEEDING INGESTION PCLS IN GROUNDWATER

Site Located at 2601 Spenwick Drive
The RectorSeal Corporation
Houston, Texas
(all concentrations are in milligrams per liter)

COC: Trichloroethene (TCE)		
Maximum Concentration Detected	1.66	
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})	0.005	
Ingestion-Based PCLE Zone:	Length (ft):	27
	Width (ft):	36
	Total Area (ft ²):	972
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})	120	
Non-Ingestion-Based PCLE Zone	None	
Geochemical/Physical Properties		
Molecular Weight:	131.39	
Specific Gravity:	1.46	
Solubility in Water:	1,100 mg/l	
COC: cis 1,2-Dichloroethene (cis-DCE)		
Maximum Concentration Detected	1.037	
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})	0.07	
Ingestion-Based PCLE Zone:	Length (ft):	30
	Width (ft):	33
	Total Area (ft ²):	990
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})	1,200	
Non-Ingestion-Based PCLE Zone	None	
Geochemical/Physical Properties		
Molecular Weight:	96.95	
Specific Gravity:	1.284	
Solubility in Water:	5,090 mg/l	
Vinyl Chloride		
Maximum Concentration Detected	0.26	
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})	0.002	
Ingestion-Based PCLE Zone:	Length (ft):	16.5
	Width (ft):	24
	Total Area (ft ²):	396
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})	3.8	
Non-Ingestion-Based PCLE Zone	None	
Geochemical/Physical Properties		
Molecular Weight:	62.50	
Specific Gravity:	0.91	
Solubility in Water:	2,760	

APPENDIX D (Water Bearing Zone B)

TABLE 2: COCs EXCEEDING INGESTION PCLs IN GROUNDWATER

Site Located at 2601 Spenwick Drive
The RectorSeal Corporation
Houston, Texas
(all concentrations are in milligrams per liter)

COC: Trichloroethene (TCE)		
Maximum Concentration Detected		7.54
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.005
Ingestion-Based PCLE Zone:	Length (ft):	129
	Width (ft):	105
	Total Area (ft ²):	13.545
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		120
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	131.39	
Specific Gravity:	1.46	
Solubility in Water:	1,100 mg/l	
COC: trans-1,2-Dichloroethene		
Maximum Concentration Detected		0.421
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.1
Ingestion-Based PCLE Zone:	Length (ft):	27
	Width (ft):	25.2
	Total Area (ft ²):	680
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		770
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	96.9	
Specific Gravity:	1.26	
Solubility in Water:	6300 mg/l	
COC: cis 1,2-Dichloroethene (cis-DCE)		
Maximum Concentration Detected		3.83
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.07
Ingestion-Based PCLE Zone:	Length (ft):	105
	Width (ft):	108
	Total Area (ft ²):	11,340
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		1,200
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	96.95	
Specific Gravity:	1.284	
Solubility in Water:	5,090 mg/l	
Vinyl Chloride		
Maximum Concentration Detected		0.526
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.002
Ingestion-Based PCLE Zone:	Length (ft):	105
	Width (ft):	54
	Total Area (ft ²):	5,670
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		3.8
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	62.50	
Specific Gravity:	0.91	
Solubility in Water:	2,760	

APPENDIX D (Water Bearing Zone C)

TABLE 3: COCs EXCEEDING INGESTION PCLS IN GROUNDWATER

Site Located at 2601 Spenwick Drive
The RectorSeal Corporation
Houston, Texas
(all concentrations are in milligrams per liter)

COC: Trichloroethene (TCE)		
Maximum Concentration Detected		2.490
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.005
Ingestion-Based PCLE Zone:	Length (ft):	258
	Width (ft):	27
	Total Area (ft ²):	6,966
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		120
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	131.39	
Specific Gravity:	1.46	
Solubility in Water:	1,100 mg/l	
COC: cis 1,2-Dichloroethene (cis-DCE)		
Maximum Concentration Detected		1.45
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.07
Ingestion-Based PCLE Zone:	Length (ft):	132
	Width (ft):	24
	Total Area (ft ²):	3,168
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		1,200
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	96.95	
Specific Gravity:	1.284	
Solubility in Water:	5,090 mg/l	
COC: Vinyl Chloride (VC)		
Maximum Concentration Detected		0.740
Ingestion-Based PCL (Residential ^{GW} GW _{Ing})		0.002
Ingestion-Based PCLE Zone:	Length (ft):	162
	Width (ft):	36
	Total Area (ft ²):	5,832
Non-Ingestion-Based PCL (^{Air} GW _{Inh-v})		3.8
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:	62.50	
Specific Gravity:	0.91	
Solubility in Water:	2,760 mg/l	

APPENDIX E

For each contaminant of concern within the designated groundwater, to the extent known, provide the following:

- a. A description of the ingestion protective concentration level exceedance zone and the non-ingestion protective concentration level exceedance zone, including a specification of the horizontal area and the minimum and maximum depth below ground surface.*
- b. The level of contamination, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L units.*
- c. Its basic geochemical properties (e.g., whether the contaminant of concern migrates with groundwater, floats or is soluble in water.)*

A description of each COC in the groundwater defined by a PCLE zone, along with its basic geochemical properties is presented in Appendix D. A table listing the maximum concentrations for each COC is provided in Appendix F.

There are no COCs identified in soil or groundwater at the designated property that exceed the non-ingestion PCLs ($^{Tot}Soil_{Comb}$ and $^{Air}Soil_{Inh-v}$ for soil and $^{Air}GW_{Inh-v}$ for groundwater).

APPENDIX F

A table displaying the following information for each contaminant of concern, to the extent known:

- a. The maximum concentration for soil and groundwater, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L.*
- b. The critical protective concentration level without the municipal setting designation, highlighting any exceedences.*

Table 1 and 2 (Appendix F) show the maximum concentrations of COCs in soil and groundwater, respectively. The tables also indicate the critical protective concentration levels without the MSD and the exceedences.

APPENDIX F

TABLE 1: MAXIMUM CONCENTRATIONS TABLE-SOIL

Site Located at 2601 Spenwick Drive

The RectorSeal Corporation

Houston, Texas

(all concentrations are in milligrams per kilogram)

Contaminants of Concern (COCs)	Residential Use (0.5-acre source area)			Sample ID	Sample Depth (ft)	Sample Date	Maximum COC Concentrations (mg/Kg)
	Ingestion-Based PCL	Non Ingestion-Based PCLs					
	^{GW} Soil _{Ing} (without MSD)	^{Tot} Soil _{Comb} (with MSD)	^{Air} Soil _{Inh-v} (with MSD)				
cis-1,2-DCE	0.25	140	920	MW-10	22	4/3/1997	0.383
TCE	0.034	120	150	MW-10	22	4/3/1997	0.193
vinyl chloride	0.022	3.7	43	MW-10	22	4/3/1997	0.045
TPH (EPA 418.1)	100	NE	NE	MW-10	17	4/3/1997	187

NE - Non-Ingestion-Based PCLs not established

APPENDIX F

TABLE 2: MAXIMUM GROUNDWATER CONCENTRATIONS

Site Located at 2601 Spenwick Drive

The RectorSeal Corporation

Houston, Texas

(all concentrations are in milligrams per liter)

Contaminants of Concern (COCs) First and Second Groundwater- Bearing Units	Ingestion- Based PCL	Non-Ingestion- Based PCL	Sample ID	Sample Date	Maxium COC Concentrations (mg/l)
	^{GW} Soil _{Ing} (without MSD)	^{Air} GW _{Inh-V} (with MSD)			
Trichloroethene (TCE)	0.005	1,200	MW-11	2/27/1998	1.66
cis-1,2-Dichloroethene (cis-1,2-DCE)	0.07	12,000	MW-11	2/27/1998	1.3
vinyl chloride	0.002	3.8	MW-10	4/27/1997	0.26

Notes:

1. Shaded concentrations represent the critical protective concentration levels without the MSD
2. Shaded and **bolded** concentrations represent the *exceedence* of critical protective concentration levels without the MSD
3. "Sample Date" column represents the most current date for the detected concentration for instances where the same maxium concentration is detected for multiple dates

APPENDIX G

A statement as to whether the plume of contamination is stable, expanding, or contracting, with the basis for that statement. If this information is not known, a statement of why the information is not known should be attached.

Based on historical data collected from the groundwater sampling of the three water bearing zones, the TCE plume is delineated and decreasing in concentration.

The attached graphs show the decrease in each COC concentration over time, with the exception of cis-1,2-DCE and vinyl chloride in water bearing zone C which are increasing. Although these concentrations are increasing, cis-1,2-DCE and vinyl chloride are “daughter products” of TCE and the increase in these COCs indicates that the TCE in the groundwater of water bearing zone C is chemically breaking down, forming these COCs. TCE concentrations in each water bearing zone are decreasing.