EXECUTIVE SUMMARY

The designated property is 8.1858-acre site located at 600-720 West 6th Street in Houston, Harris County, Texas. The site is currently developed for commercial/industrial land use and consists of one 46,277 square-foot office/warehouse building (Building 1), one 139,886 square foot office/warehouse building (Building 2), and parking areas between the two buildings. The buildings are divided into lease spaces of various configurations and leased by commercial facilities. West 6th Street borders the site to the north followed by a commercial/industrial property. An abandoned railroad spur borders the site boundary to the east and farther east is a commercial/industrial property. White Oak Bayou, a concrete-lined drainage feature, borders the south and west site boundary. A commercial/industrial facility is located west of the bayou and a residential development is located south of the bayou.

Swift & Co. and/or Swift Chemical Company (Swift) formerly owned the site. Swift & Company in Houston operated as an agricultural chemical division that mixed fertilizers. Therefore, for this and other reasons, it is assumed that Swift manufactured and/or mixed products associated with the agricultural industry. The suspected sources of chemicals of concern (COCs) are former above-ground storage tanks (ASTs) and a pond in the southeastern portion of the site, operated by Swift. The Swift facility was demolished prior to 1981 and the former pond has been filled. Therefore, there are no active sources for COCs to contribute to the plume.

Several investigations have been conducted at the site by various consultants and to investigate soil and groundwater for evidence of impact. The investigations have included the collection and analysis of soil and groundwater samples for analysis of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, nitrates and/or priority metals.

Groundwater monitoring has been conducted at the site since 1991 and some wells have been sampled on 13 occasions. Carbon tetrachloride, chloroform, 1,2- Dichloroethane, methylene chloride, and nitrates are the only COCs that were detected at concentrations exceeding groundwater ingestion PCLs (i.e. $^{GW}GW_{Ing}$) in recent sampling events. Historical groundwater sampling data indicate that these COCs are naturally attenuating—concentrations have steadily decreased over time. The results of the latest sampling event completed in March 2013 further indicate that only three COCs (carbon tetrachloride, methylene chloride, and nitrates) remain at concentrations above groundwater ingestion PCLs. Therefore, as reported in the approved Affected Property Assessment Report (APAR) and groundwater monitoring reports submitted to the TCEQ for the designated property, groundwater plumes for all COCs have been delineated in all directions and the groundwater plumes are stable or declining.

Additionally, due to the proximity of White Oak Bayou to the site, four surface water samples (SW-1 through SW-4) were collected as part of site assessment activities. These surface water sample locations are shown Appendix C-Figure 1D. A table showing surface water sampling

data is included as Table G-2. The surface water samples did not contain COCs at concentrations above the PCLs.

The applicant's current plan for the designated property is to obtain regulatory closure from the TCEQ. 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.

APPENDIX A

Appendix A

Provide a legal description of the boundaries of the designated property, including metes and bounds, and a copy of the deed for the property. A professional surveyor currently registered with the Texas Board of Professional Surveying must certify that all property descriptions with metes and bounds are accurate.

A legal description of the boundaries of the designated property and a copy of the deed are enclosed.

BENCH MARK

B.M.: CITY OF HOUSTON SURVEY MARKER 5258/1606
- ELEVATION = 50.40' (73 ADJ.)

T.B.M.: TOP OF CURB LOCATED IN SOUTHWEST CORNER OF SITE. ELEVATION = 49.39'

METES AND BOUNDS DESCRIPTION
8.1858 ACRES OUT OF BLOCKS 295, 296 & 297
HOUSTON HEIGHTS ADDITION AND
ABANDONED WAVERLY & ASHLAND STREETS
HOUSTON, HARRIS COUNTY, TEXAS

All that certain 8.1858 acres of land, being a part of Blocks 295, 296 and 297, part of Waverly Street (abandoned) and part of Ashland Street (abandoned), all being in Houston Heights Addition, according to the plat thereof filed in Volume 64, Page 1 of the Harris County Deed Records and being more particularly described by metes and bounds as follows:

BEGINNING at a set 5/8" iron rod with cap in the south line of 6th Avenue (70' wide) located N 89° 59' 00" W - 147.00' from its intersection with the west line of Waverly Street (70' wide) and also being the northwest corner of a 15.00' alley through said Block 297;

THENCE S 89° 59' 00" E - 629.15', with the south line of said 6th Avenue, to a found 1" iron pipe for corner;

THENCE S 00° 04' 20" W - 228.68', to a found 5/8" iron rod for corner;

THENCE S 89° 59' 00" E - 3.74', to a found 5/8" iron rod for corner;

THENCE S 00° 30' 04" E - 287.00', to a found 5/8" iron rod for corner, on the northerly line of the Harris County Flood Control District easement for White Oak Bayou;

THENCE S 75° 50' 43" W 71.27', continuing with the northerly line of said Harris County Flood Control easement, to a found 1" iron pipe for an angle point;

THENCE S 50° 29' 10" W - 183.30', continuing with the northerly line of said Harris County Flood Control easement, to a set 5/8" iron rod with cap for an angle point;

THENCE N 89° 59' 00" W - 207.59', continuing with the northerly line of said Harris County Flood Control easement, to a found 5/8" iron rod for corner;

THENCE North - 9.59', with the east right-of-way line of said Waverly Street (abandoned), to a found 5/8" iron rod being a point on a curve having a central angle of 53° 48' 35", a radius of 168.31', the center of said curve being located on a radial line bearing N 19° 23' 55" E from said point, and having a chord bearing of N 43° 41' 47" W, and a chord length of 152.32';

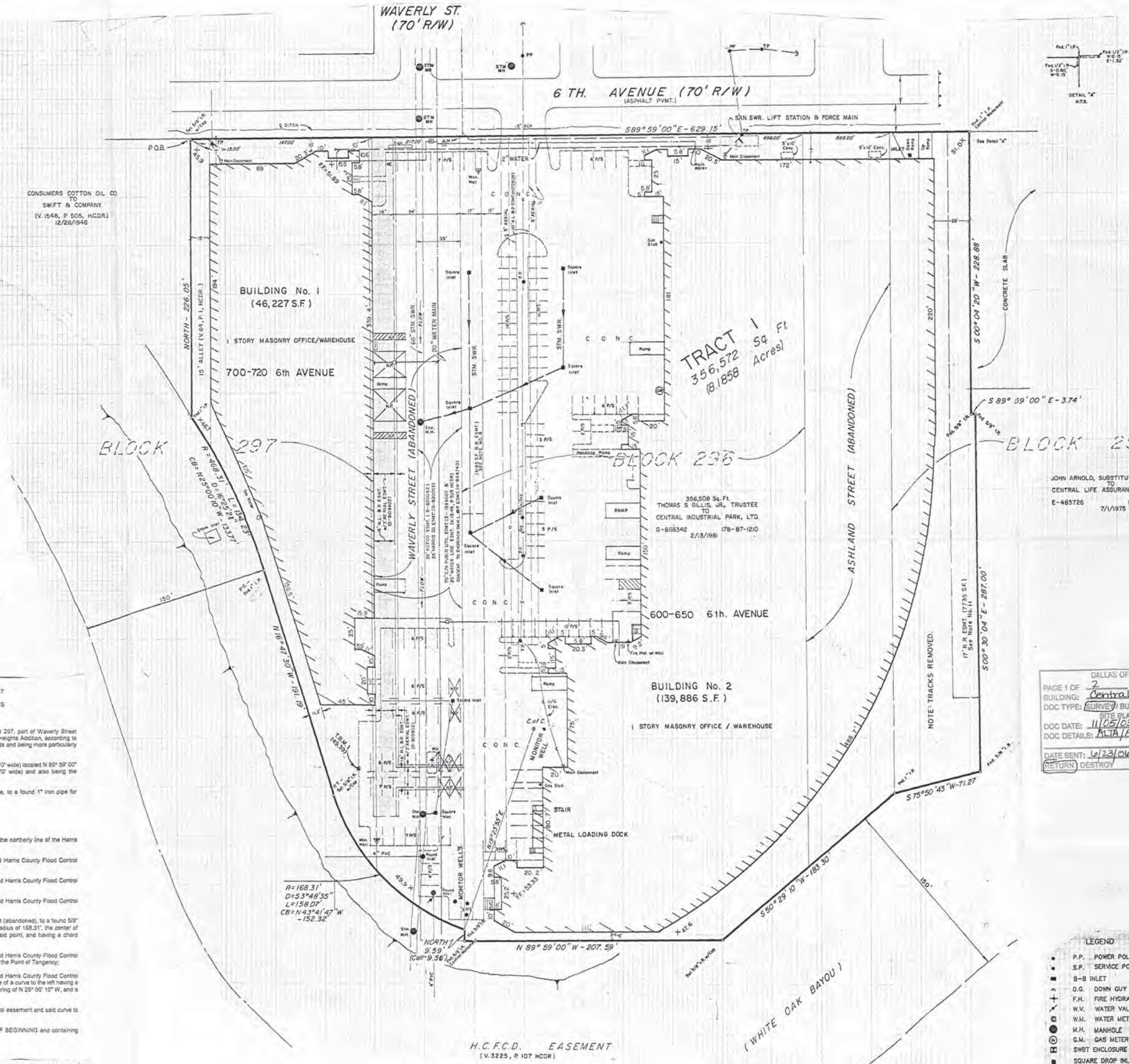
THENCE in a northwesterly direction continuing with the easterly line of said Harris County Flood Control easement an arc distance of 158.07', to a set 5/8" iron rod with cap marking the Point of Tangency;

THENCE N 16° 47' 30" W - 191.19', continuing with the easterly line of said Harris County Flood Control District easement line, to a found 1" iron pipe marking the Point of Curvature of a curve to the left having a central angle of 16° 26' 21" and a radius of 468.31', and having a chord bearing of N 25° 00' 10" W, and a chord length of 133.77';

THENCE continuing with the easterly line of said Harris County Flood Control easement and said curve to the left an arc distance of 134.23', to a found 1" iron pipe for corner;

THENCE North - 205.05', with the west line of said alley, to the POINT OF BEGINNING and containing 8.1858 acres (356,572 square feet) of land, more or less.

EASEMENT ESTATE created for perpetual non exclusive easement for rail service purposes as set out in Warranty Deed dated June 26, 1979, filed for record under Harris County Clerk's File No. G183466, from Thomas S. Gillis, Jr. to Crow Green Joint Venture, a Texas joint venture. (As to Tract II)



I hereby certify to The Prudential Mortgage Capital Company, LLC, its successors and assigns, LIT Industrial Texas Limited Partnership, and Chicago Title Insurance Company that this is a true and correct survey of 356,572 square feet of land out of the Houston Heights Addition and shows the true and correct location of the buildings and improvements situated on such land and all easements, rights-of-way, setback lines, and similar restrictions of record affecting the property surveyed. The buildings and improvements do not overhang or encroach upon any easement or rights-of-way of others, and there are no encroachments either way across the property lines except as shown. The property surveyed contains 356,572 square feet and 119 parking spaces, and is located within a flood plain area. I hereby certify that this survey is made at least in accordance with the "Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys," jointly established and adopted by ALTA, ACSM and NSPS in 1999 and includes Items 1, 2, 3, 4, 6, 7(a), 7(b)(1), 7(b)(2), 7(c), 8, 9, 10, 11(b), 13, 14, 15 and 16 of Table A thereof. Pursuant to the Accuracy Standards adopted by ALTA, NSPS and ACSM and in effect on the date of this certification, the undersigned further certifies that the Positional Uncertainties resulting from the survey measurements made on the survey to do not exceed the allowable Positional Tolerance.

The subject site is located in the 100 year flood plain per Flood Insurance Rate Map 48201C0670K, dated 04-20-2000, Zone "AE".

STATE OF TEXAS
REGISTERED
N. M. MATHIS
4517
PROFESSIONAL
LAND SURVEYOR

12-17-2003 — N.M. MATHIS — 4517
DATE — N.M. MATHIS — R.P.L.S. NO.

GENERAL NOTES

1. BEARINGS SHOWN BASED ON RECORD PLAT.
2. A PORTION OF THE SUBJECT SITE IS LOCATED WITHIN THE 100 YEAR SPECIAL FLOOD HAZARD AREA ACCORDING TO THE MOST RECENT OFFICIAL INSURANCE RATE MAP, DATED APRIL 20 ,2000 MAP NUMBER 48201C 0670 K, ZONE "AE", PROMULGATED BY THE ADMINISTRATOR OF THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OF THE UNITED STATES. ANY REFERENCE TO THE 100 YEAR FLOOD PLAIN OR FLOOD HAZARD ZONES, ARE AN ESTIMATE BASED ON DATA PROVIDED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY'S FLOOD INSURANCE PROGRAM AND SHOULD NOT BE INTERPRETED AS A STUDY OR DETERMINATION OF THE FLOODING PROPENSITIES OF THIS PROPERTY.
3. FUTURE REDEVELOPMENT OF SITE IS SUBJECT TO CITY OF HOUSTON ORDINANCE NO. 85-1878, DATED OCTOBER 23, 1985 BY THE CITY OF HOUSTON, A CERTIFIED COPY OF WHICH WAS FILED AUGUST 1, 1991, UNDER COUNTY CLERK FILE NO. N-253886, (SUPERSEDED BY CITY OF HOUSTON ORDINANCE NO. 1999-262), ADOPTED BY THE CITY OF HOUSTON RELATING TO RULES, AND REGULATIONS, PROCEDURES AND DESIGN STANDARDS FOR DEVELOPING AND PLATTING AND PROVIDING FOR ESTABLISHING BUILDING SETBACK LINES.
4. SITE CONTAINS 118 PARKING SPACES AND 1 HANDICAP SPACE.
5. UTILITIES SHOWN HEREON ARE BASED ON CITY OF HOUSTON AND UTILITY COMPANY DRAWINGS WITH FIELD TIES TO EXISTING SURFACE FIXTURES. ALL UTILITIES SHOULD BE FIELD VERIFIED PRIOR TO CONSTRUCTION.
6. THIS ORIGINAL WORK IS PROTECTED UNDER COPYRIGHT LAWS, TITLE 17 UNITED STATES CODE SECTIONS 101 AND 102. ALL VIOLATIONS WILL BE PROSECUTED TO THE FULLEST EXTENT OF THE LAW. THIS SURVEY IS BEING PROVIDED SOLELY FOR THE USE OF THE RECIPIENTS NAMED ABOVE AND NO LICENSE HAS BEEN CREATED, EXPRESS OR IMPLIED TO COPY THE SURVEY EXCEPT AS NECESSARY IN CONJUNCTION WITH THE ORIGINAL TRANSACTION, WHICH SHALL TAKE PLACE WITHIN THIRTY (30) DAYS FROM THE DATE ADJACENT TO THE SIGNATURE LINE HEREIN.
7. SITE CONTAINS NO EXISTING RAILROAD TRACKS.
8. PERPETUAL EASEMENT FOR THE DISCHARGE OF STORM WATERS RESERVED BY SWIFT AND CO. D-631755.
9. RIGHTS OF H & T. T. & N.O. AND THE M.K.T. RAILROADS OVER THOSE SPUR TRACKS. D-631755
10. PERMISSION TO BUILD OVER CITY ESMT.(H-183545)
11. SITE HAS RIGHTS TO THE USE OF RR SPUR TRACKS TO THE NORTH PER G-183466.
12. CONSENT TO ENCROACH INTO H.L.&P. ESMT. SHOWN AS D-809802, H-272809 WITH CONCRETE PAVING BY DOCUMENT H-804740.
13. PERMISSION TO BUILD OVER CITY ESMT. H-183545 BY DOCUMENTS RECORDED IN R-392211, R-392212, R-392223, R-431084.

DALLAS OFFICE
PAGE 1 OF 2
BUILDING: Central 1 & 2
DOC TYPE: SURVEY / BUILDING PLAN / SITE PLAN
DOC DATE: 11/05/03
DOC DETAILS: ALTA / ACSM Survey
DATE SENT: 6/23/06
RETURN: OESTROY

LEGEND

P.P.	POWER POLE
S.P.	SERVICE POLE
B-B	INLET
D.G.	DOWN GUY
F.H.	FIRE HYDRANT
W.V.	WATER VALVE
W.M.	WATER METER
M.H.	MANHOLE
G.M.	GAS METER
SWBT	ENCLOSURE
	SQUARE DROP INLET
S/L	STREET LIGHT

12-17-2003 REVISED — SHEET 1 OF 2

PREJEAN & COMPANY, INC.
surveying / mapping
9324 WESTVIEW DRIVE
HOUSTON, TX 77055
713-467-MAPS

ALTA / ACSM

LAND TITLE SURVEY

356,572 S.F. OUT OF
BLOCKS 295, 296 & 297 HOUSTON HEIGHTS ADDITION
AND
ABANDONED WAVERLY & ASHLAND STREETS

HOUSTON, HARRIS COUNTY, TEXAS

11-05-2003	SCALE: 1"=40	14-35-2A
GF NO. 000626987	CHICAGO TITLE INSURANCE	

Lawyer's Title Company
617 Caroline
Houston, Texas 77002
178-87-1210

GENERAL WARRANTY DEED

THE STATE OF TEXAS §
§ KNOW ALL MEN BY THESE PRESENTS:
COUNTY OF HARRIS §

THAT I, THOMAS S. GILLIS, JR., Trustee, (hereinafter called "Grantor") of the County of Harris and State of Texas, for and in consideration of the sum of TEN AND NO/100 DOLLARS and other good and valuable consideration to the undersigned paid by the Grantee herein named, the receipt of which is hereby acknowledged, have GRANTED, SOLD and CONVEYED, and by these presents do GRANT, SELL and CONVEY unto CENTRAL INDUSTRIAL PARK, LTD., a Texas limited partnership, all of the following described real property in Harris County, Texas, to-wit:

All that certain tract or parcel of land containing 356,508 square feet, more or less, being a part of Blocks 295, 296 and 297, Part of Waverly Street (abandoned) and a part of Ashland Street (abandoned), all being in Houston Heights Addition, according to plat thereof recorded in Volume 64, Page 1, Deed Records of Harris County, Texas; said 356,508 square feet of land being the same land conveyed and described as Tract 2 in deed dated December 28, 1977, from Swift Agricultural Chemicals Corporation to Grantor, filed for record in the office of the County Clerk of Harris County, Texas, on January 6, 1978, under Clerk's File No. F-434338 and being more particularly described by metes and bounds as follows:

BEGINNING at a one inch iron pipe in the south line of 6th Avenue based on seventy feet in width, same being located North 89 degrees 59 minutes 00 seconds west, 147.00 feet from its intersection with the west line of Waverly Street; said beginning point being at the northwest corner of a fifteen feet alley through the said Block 297;

THENCE south 89 degrees 59 minutes 00 seconds east, along the south line of 6th Avenue at fifteen feet pass the northeast corner of said alley, at 147.00 feet pass the northeast corner of the said Block 297, at 217.00 feet pass a 5/8 inch iron rod marking the northwest corner of the said Block 296, at 496.00 feet pass the northeast corner of Block 296, at 566.00 feet pass the northwest corner of the said Block 295, in all a distance of 629.15 feet to a one inch iron pipe for corner;

THENCE south 0 degree 04 minutes 20 seconds west, a distance of 228.88 feet to a 5/8 inch iron rod for corner;

THENCE south 89 degrees 59 minutes 00 seconds east, a distance of 3.74 feet to a 5/8 inch iron rod for corner;

FILED
FEB 18 10 27 AM 1981
Chris Kachelmann
COUNTY CLERK
HARRIS COUNTY, TEXAS

THENCE south 0 degree 30 minutes 04 seconds east, a distance of 287.00 feet to a 5/8 inch iron rod in the northerly line of the Harris County Flood Control District easement for White Oak Bayou;

THENCE south 75 degrees 50 minutes 43 seconds west, along the northerly line of said easement, 71.27 feet to a one inch iron pipe for an angle point;

THENCE south 50 degrees 29 minutes 10 seconds west, continuing along the northerly line of said easement, 183.30 feet to a 5/8 inch iron rod for an angle point;

THENCE north 89 degrees 59 minutes 00 seconds west, along said easement line, a distance of 207.59 feet to a one inch iron pipe in the easterly line of Waverly Street (abandoned);

THENCE north, along the easterly line of Waverly Street (abandoned) 9.55 feet to a point for corner;

THENCE in a northwesterly direction, continuing along the said flood control easement and along a curve to the right having a radius of 168.31 feet for a distance of 157.50 feet to a one inch iron pipe for a point of tangency;

THENCE north 16 degrees 47 minutes 30 seconds west, continuing along said easement line, 191.19 feet to a one inch iron pipe for a point of curvature;

THENCE, in a northwesterly direction, continuing along the said flood control easement line, and along a curve to the left having a radius of 468.31 feet for a distance of 134.23 feet to a one inch iron pipe in the west line of the aforementioned 15.00 foot alley through Block 297;

THENCE north, along the west line of said alley, 226.05 feet to the point or PLACE OF BEGINNING and containing as aforesaid 356,508 square feet of land, more or less.

Together with all the right title and interest of Thomas S. Gillis, Jr., Trustee, in and to that certain easement for rail service purposes retained in that certan deed dated June 26, 1979, from Thomas S. Gillis, Jr., Trustee, to Crow-Green Joint Venture, filed for record on August 3, 1979 under Harris County Clerk's File No. G-183466 and recorded under Film Code No. 135-85-1522 in the Official Public Records of Real Property of Harris County, Texas.

This conveyance is made and accepted subject to the matters reflected in Exhibit "A" attached hereto and made a part of for all purposes, to the extent the same are valid and subsisting and affect the herein described property.

together with all and singular the rights and appurtenances thereto in anywise belonging, unto the said grantee, its successors and assigns forever; and I do hereby bind myself, my successors and assigns to WARRANT AND FOREVER DEFEND all and singular the said premises unto the said grantee, its successors and assigns, against every person whomsoever lawfully claiming or to claim the same or any part thereof.

Taxes for the year 1981 have been prorated and grantee agrees to pay the same.

Executed this 13TH day of FEBRUARY, 1981.

Thomas S. Gillis Jr.

THOMAS S. GILLIS, JR., TRUSTEE

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared THOMAS S. GILLIS, JR., TRUSTEE, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration therein expressed and in the capacity therein stated.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 13 day of February, 1981.

Deanna Jensen

Notary Public--
State of Texas

DEANNA JENSEN
Notary Public in Harris County, Texas
My Commission Expires June 8, 1981
Bonded by Alexander Lovett, Lawyers Surety Corp.

Typed or Printed Named of Notary

My Commission Expires:

EXHIBIT A

1. Taxes for the year 1981 and subsequent years.

2. Water Line Easement recorded in Volume 1548, Page 505, Deed Records of Harris County, Texas.

3. Easement recorded under Clerk's File No. D-809802, Records of Harris County, Texas.

4. Easement to the Harris County Flood Control District recorded under Clerk's File No. D-820062 and D-820063.

5. Utility Easement to the City of Houston recorded under Clerk's File No. E-138900.

6. Easement for the Discharge of Storm Waters reserved by Swift & Company in deed to Swift Agricultural Chemicals Corporation filed under Clerk's File No. D-631755.

7. Right of the Houston & Texas Central Railroad Company and Texas and New Orleans Railroad Company to the ownership and operation of the railroad side tracks under terms of Agreement dated September 26, 1929, with Houston Cotton Mill and assigned by Consumers Cotton Oil Mill to Swift & Company by instrument dated December 28, 1946; rights of the Missouri-Kansas Texas Railroad Company of Texas to the ownership and operation of the railroad side tracks pursuant to the terms of Agreement dated January 28, 1930, with Houston Cotton Oil Mill and assigned by Consumers Cotton Oil Mill Company doing business as Houston Cotton Oil Mill to Swift & Company by assignment dated December 28, 1946 and as set out in deed to Swift Agricultural Chemicals Corporation dated June 26, 1972 filed under Clerk's File No. D-631755.

8. Subject to existing railroad spur tracks traversing through the Property.

STATE OF TEXAS
COUNTY OF HARRIS

I hereby certify that this instrument was FILED in File Number Sequence on the date and at the time stamped hereon by me and was duly RECORDED, in the Official Public Records of Real Property of Harris County, Texas on

FEB 18 1981

COUNTY CLERK,
HARRIS COUNTY, TEXAS

APPENDIX B

Appendix B

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

A map depicting the designated property and the adjacent properties are presented on Figure A (Adjacent Properties Map) in Appendix B. The designated property buildings are divided into lease spaces of various configurations and leased by various entities for commercial purposes. Current tenants include: Roadrunner Courier, a courier service and document management service provider; Douglas Pads & Sports, a manufacturer and distributor of protective equipment used in football, hockey, and basketball; Oscar Banks, a wholesale food distributor; Queen Moving, a moving and storage facility; Partners for Harris County Children, a facility that stores donated items; ISI Commercial Refrigeration, a business that services and leases commercial refrigeration and food service equipment; and Corporate Liquidators; a retailer of pre-owned office furniture.

The properties within 500 feet of the designated property are mostly commercial/industrial and are described below:

North: West 6th Street bounds the site on the north and farther north is a commercial/industrial properties.

East: An abandoned railroad spur borders the east site boundary and farther east is undeveloped land.

South: White Oak Bayou, a concrete-lined drainage feature, borders the south and west site boundary. Farther southwest is a commercial/industrial property.

West: A commercial/industrial facility is located west of the bayou and a residential development is located south of the bayou.

The future use of the surrounding property is not anticipated to change from its current use.

0 200 400 Feet

1 inch = 400 feet

Terracon
Consulting Engineers & Scientists

Terracon No. 92137736

CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	7-12-2011

Figure A
Adjacent Properties Map
Central Industrial Park
600-720 West 6th Street
Houston, Texas

APPENDIX C

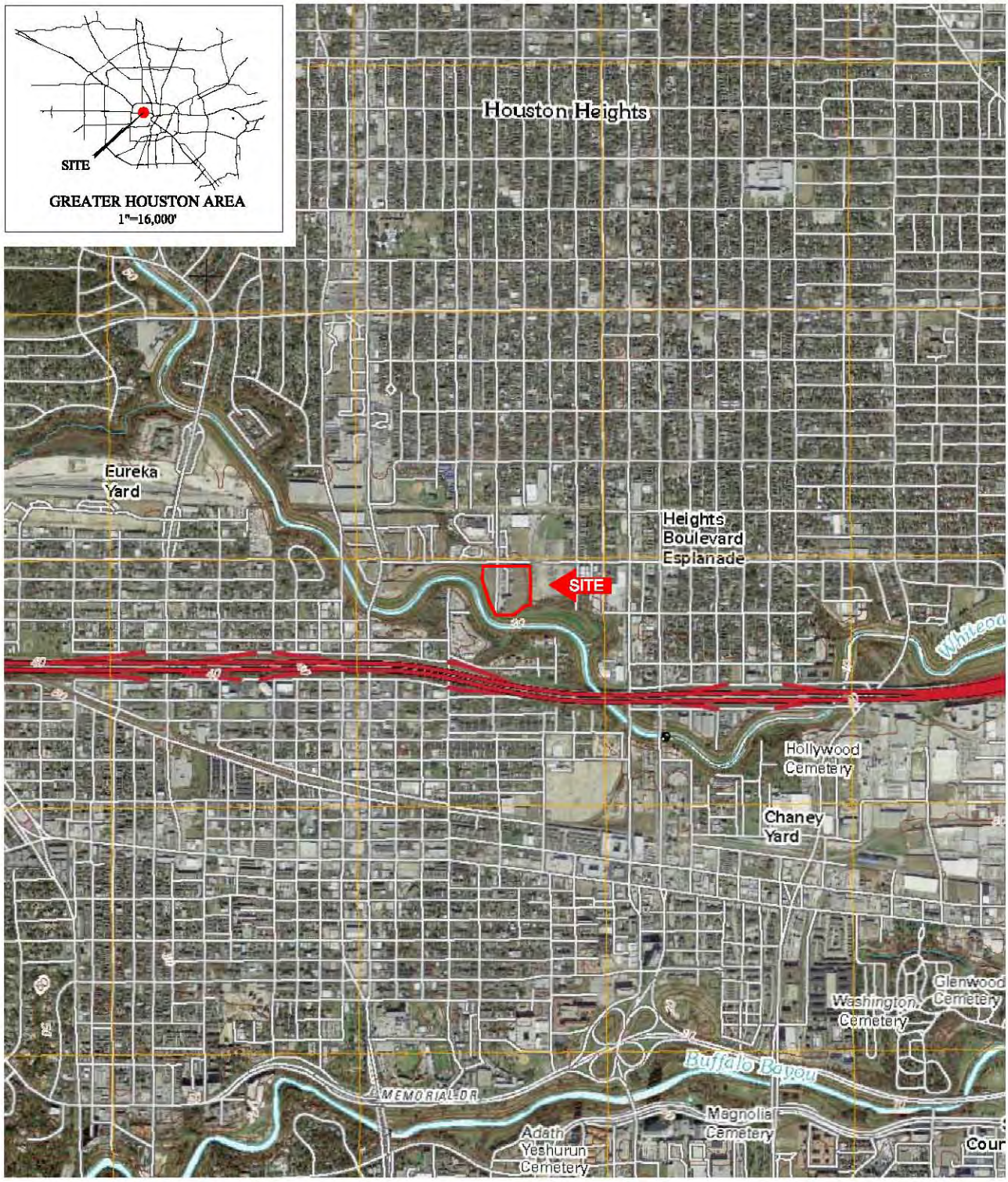
Appendix C

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 including the nearest surface water body and whether the designated property is located in a floodplain or floodway, as those terms are defined in Chapter 19 of the Code of Ordinances.*
c. *The detected area of groundwater contamination.*
d. *The location of all soil sampling locations and all 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 contaminate of concern, to the extent known.*
g. *Depth to groundwater for each affected zone.*

Attached Figures

Figure 1A – Location of the Designated Property
Figure 1B – Topographic Map
Figure 1C – Groundwater PCLE Zone Map
Figure 1C – Site Plan Showing Soil Borings and Monitor Wells
Figure 1E-1-Groundwater Gradient Map (March 19, 2013)
Figure 1E-2-Groundwater Gradient Map (October 28, 2011)
Figure 1E-3-Groundwater Gradient Map (July 20, 2011)
Figure 1E-4-Groundwater Gradient Map (October 19, 2010)
Figure 1E-5-Groundwater Gradient Map (January 20, 2010)
Figure 1E-6-Groundwater Gradient Map (March 11, 2008)
Figure 1E-7-Groundwater Gradient Map (January 10, 2002)
Figure 1F-1-Groundwater PCLE Zone – Carbon Tetrachloride
Figure 1F-2-Groundwater PCLE Zone – Chloroform
Figure 1F-3-Groundwater PCLE Zone – 1,2-Dichloroethane
Figure 1F-4-Groundwater PCLE Zone – Methylene Chloride
Figure 1F-5-Groundwater PCLE Zone – Nitrates



USGS TOPOGRAPHIC QUADRANGLE MAP
Houston Heights, Texas

Terracon
Consulting Engineers & Scientists

Topo Revised: 2010
Aerial Photo Revised: 2009

APPROXIMATE SCALE 1"= 2000'
0 1000' 2000'

N

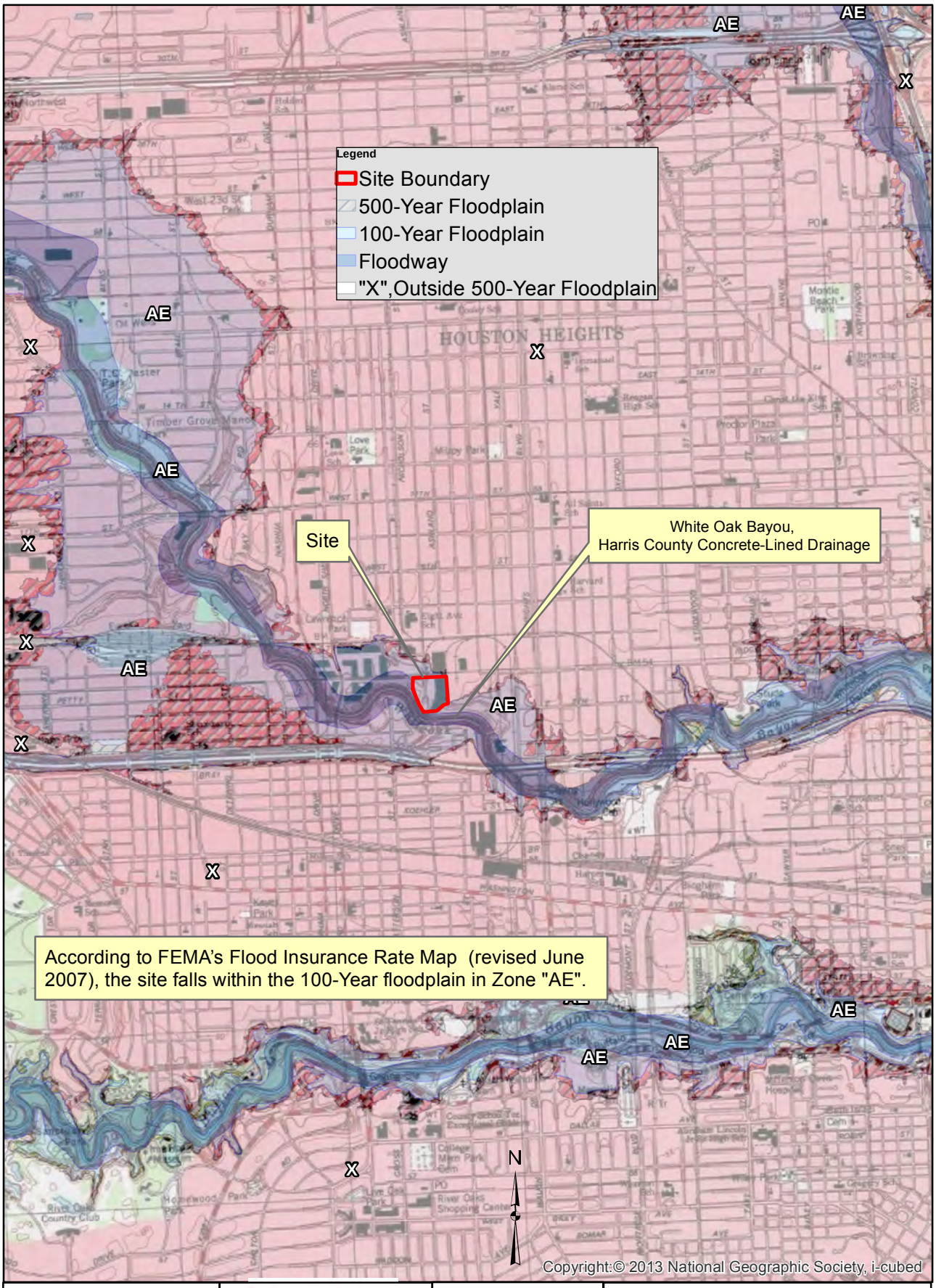
Central Industrial Park
600-720 W. 6th Street
Houston, Texas

TERRACON PROJECT NO. 92137736

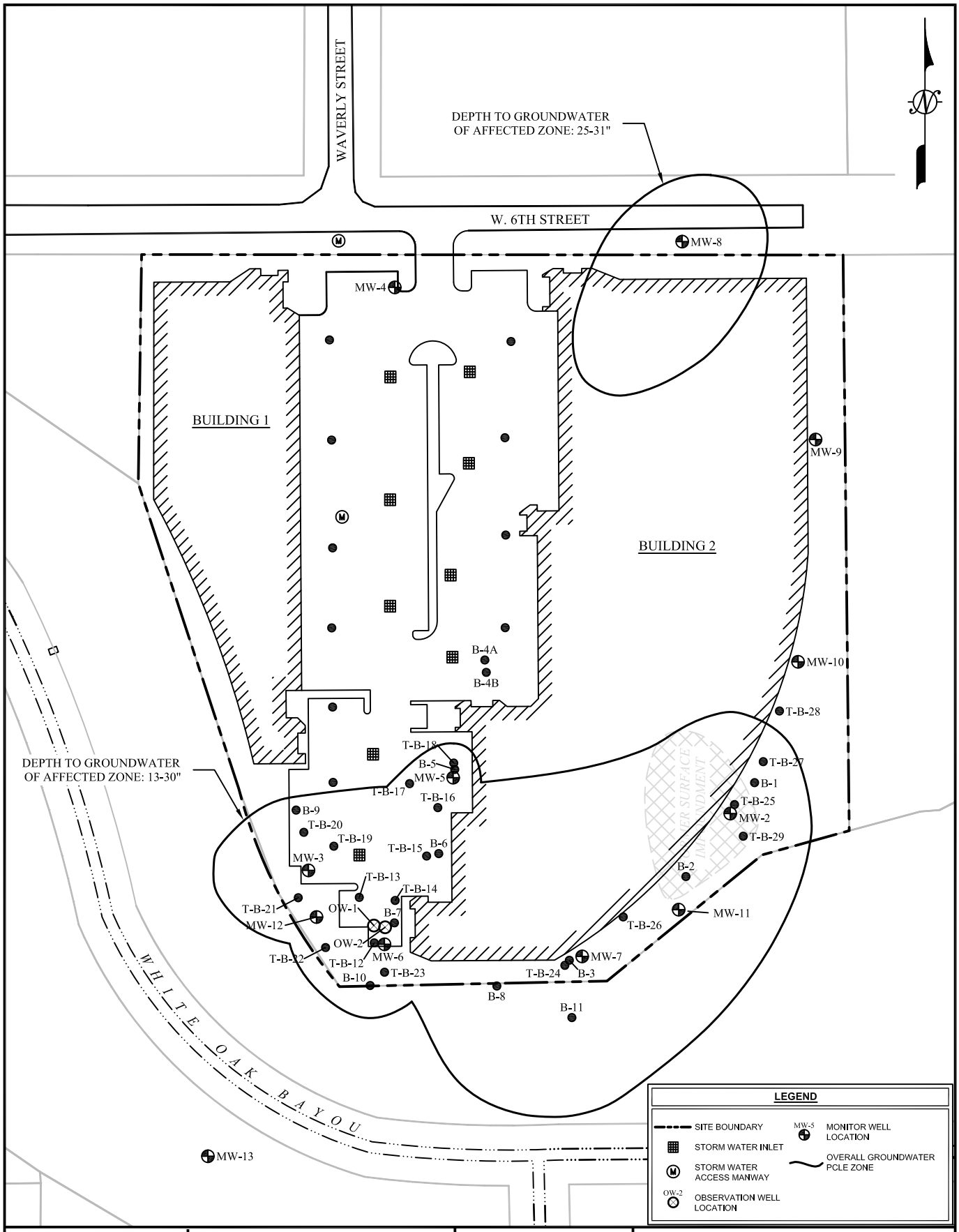
Prepared By: AD
Approved By: AN

FIGURE 1A:
LOCATION OF THE DESIGNATED PROPERTY

N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1A.dwg



0 0.25 0.5 Miles 1 inch = 0.5 miles	Terracon Consulting Engineers & Scientists Terracon No. 92137736	CHECKED BY: AN SCALE: AS SHOWN DATE: 7-12-2011	**Figure 1B** **Topographic Map** Central Industrial Park 600-720 West 6th Street Houston, Texas



0 60' 120'

APPROXIMATE SCALE 1"= 120'

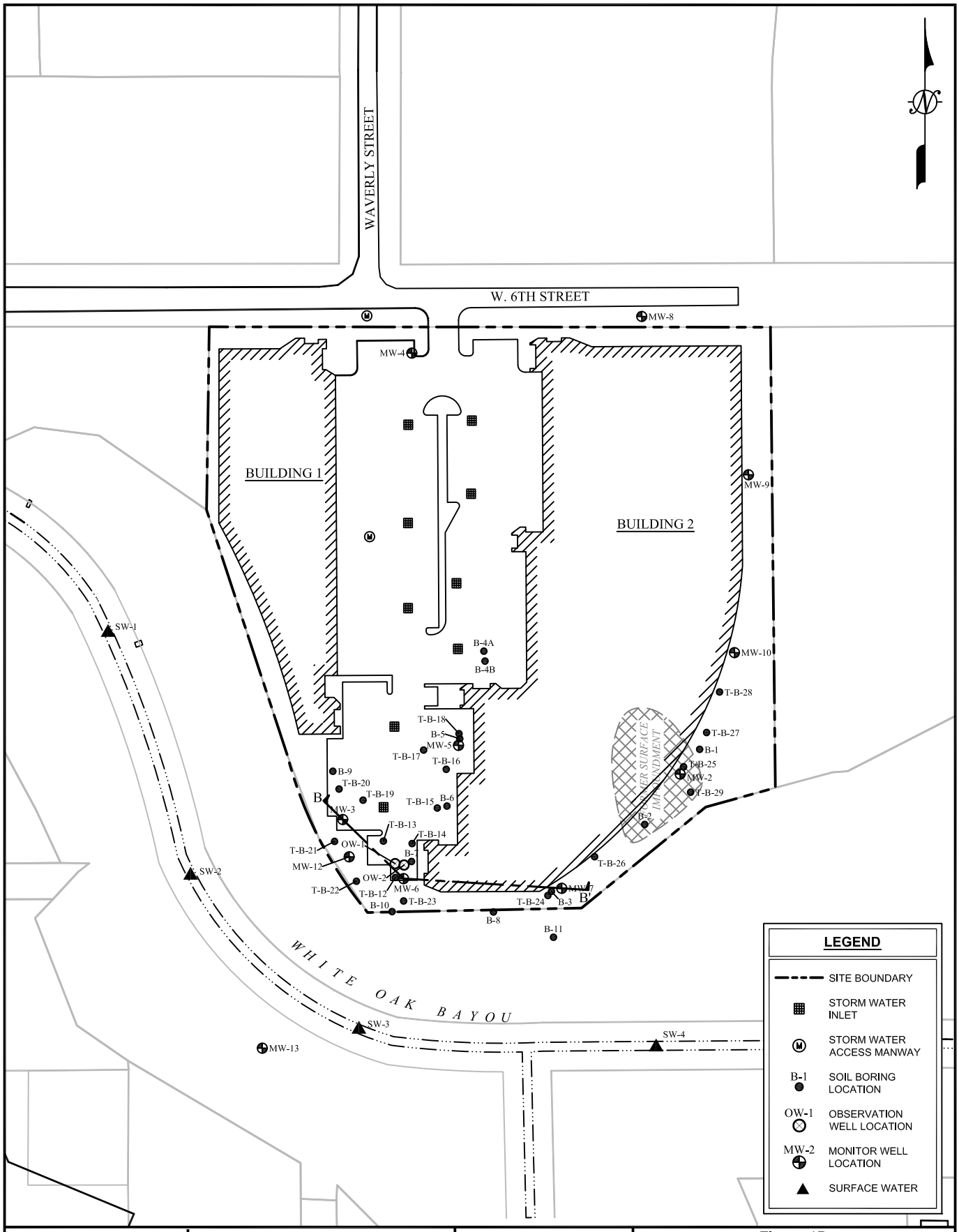
Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	11-19-2013

Figure 1C
Groundwater PCLE Zone Map
Central Industrial Park
600-720 W. 6th Street
Houston, Texas

N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1C.dwg : Figure 1C



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1D.dwg : Figure 1D

0 75' 150'

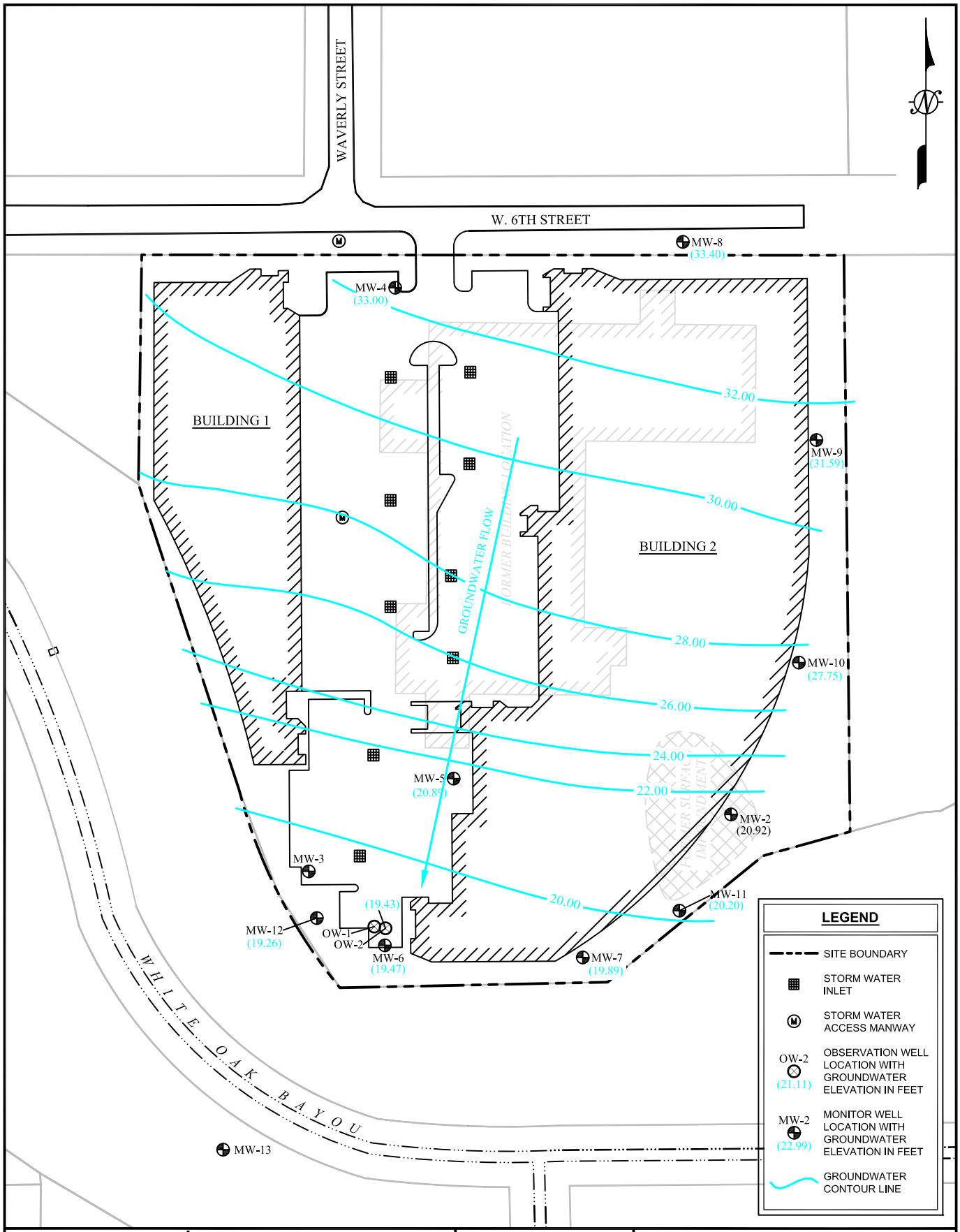
APPROXIMATE SCALE 1"= 150'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1D
Site Plan Showing Soil Borings and Monitor Wells
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



0 60' 120'

APPROXIMATE SCALE 1"= 120'

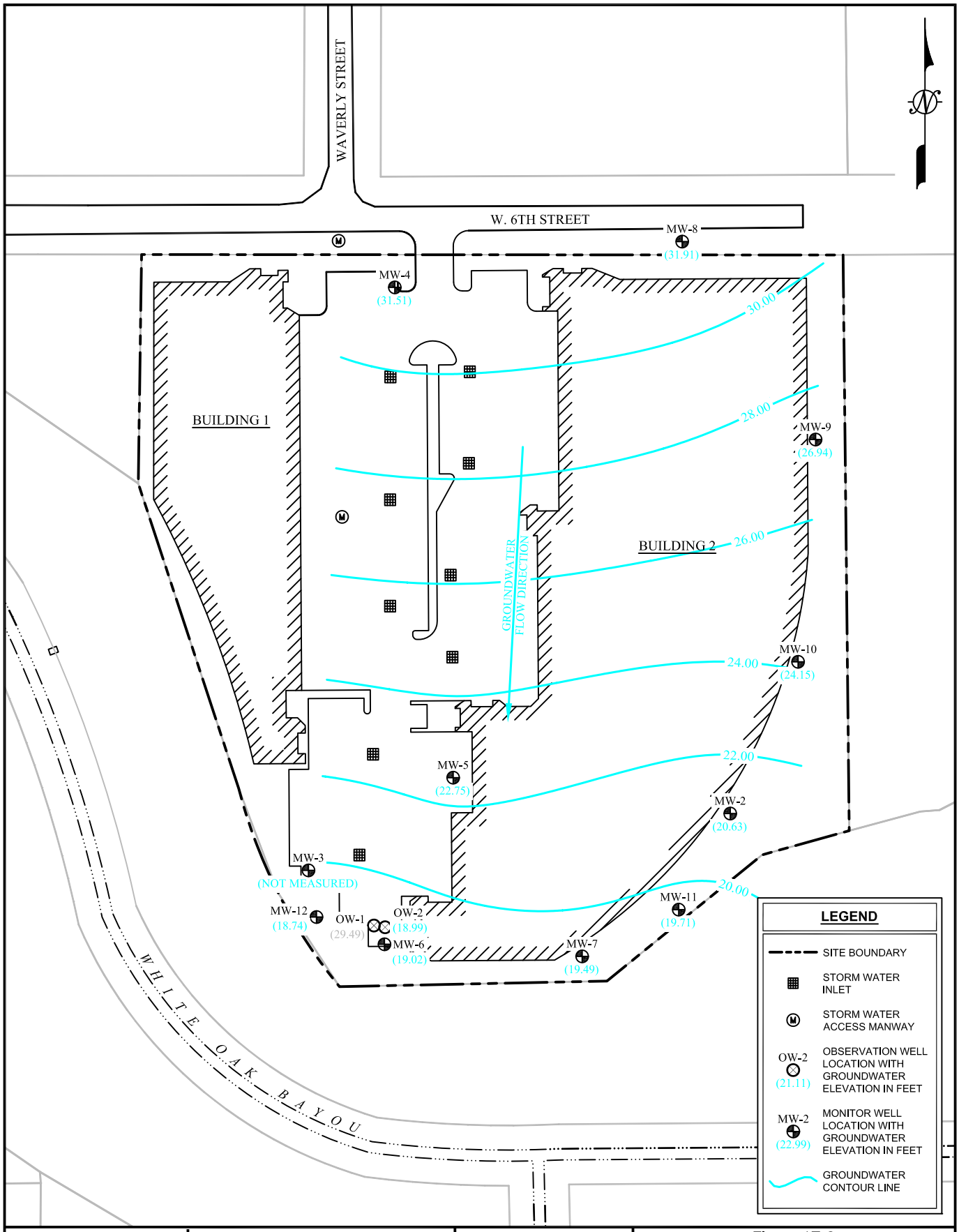
Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	11-19-2013

Figure 1E-1
Groundwater Gradient Map
March 19, 2013
Central Industrial Park
600-720 W. 6th Street
Houston, Texas

N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-1.dwg : Figure 1E-1



0 60' 120'

APPROXIMATE SCALE 1"= 120'

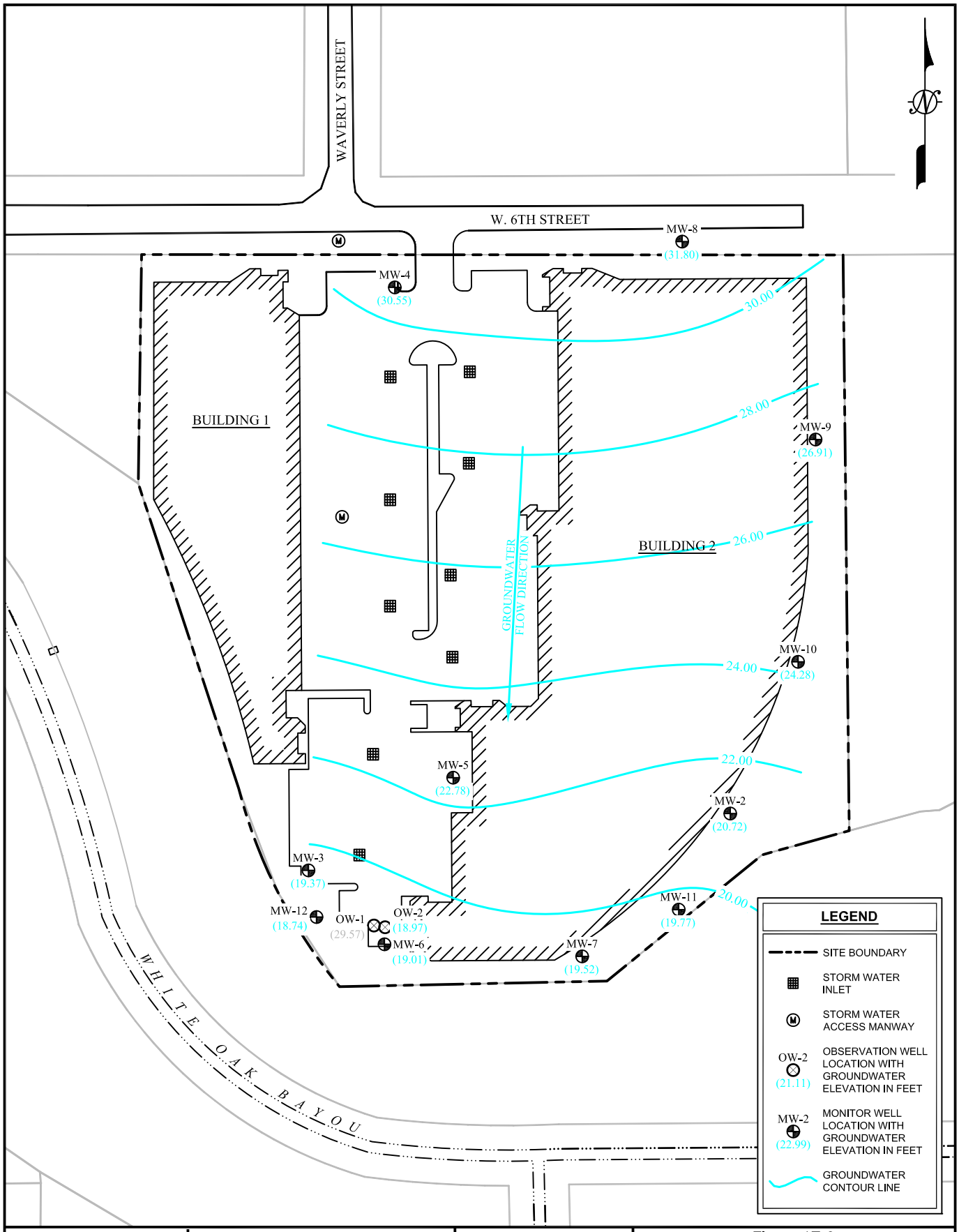
Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1E-2
Groundwater Gradient Map
October 28, 2011
Central Industrial Park
600-720 W. 6th Street
Houston, Texas

N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-2.dwg : Less OW-1



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-3.dwg : Less OW-1

0 60' 120'

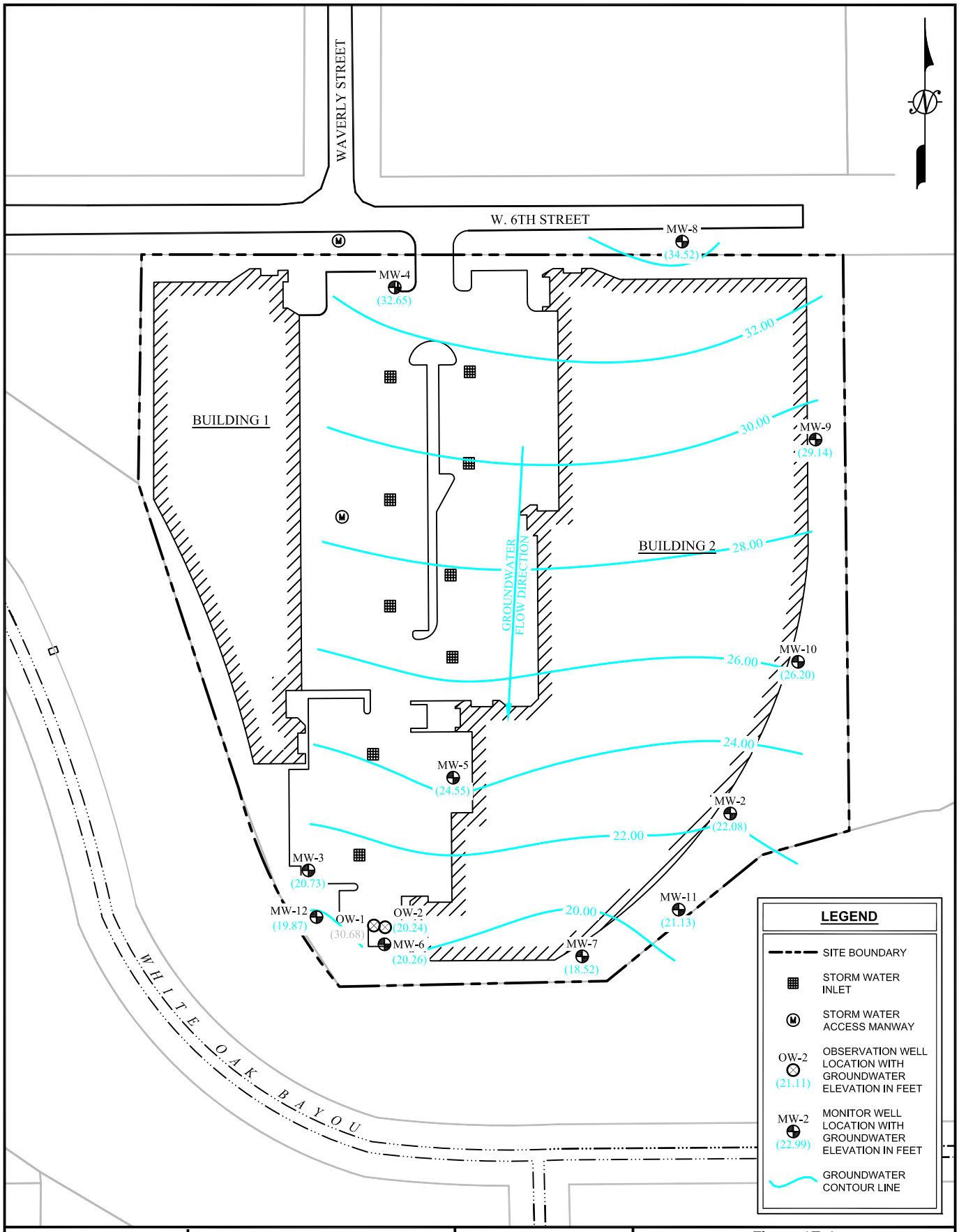
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1E-3
Groundwater Gradient Map
July 20, 2011
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-4.dwg : Less OW-1

0 60' 120'

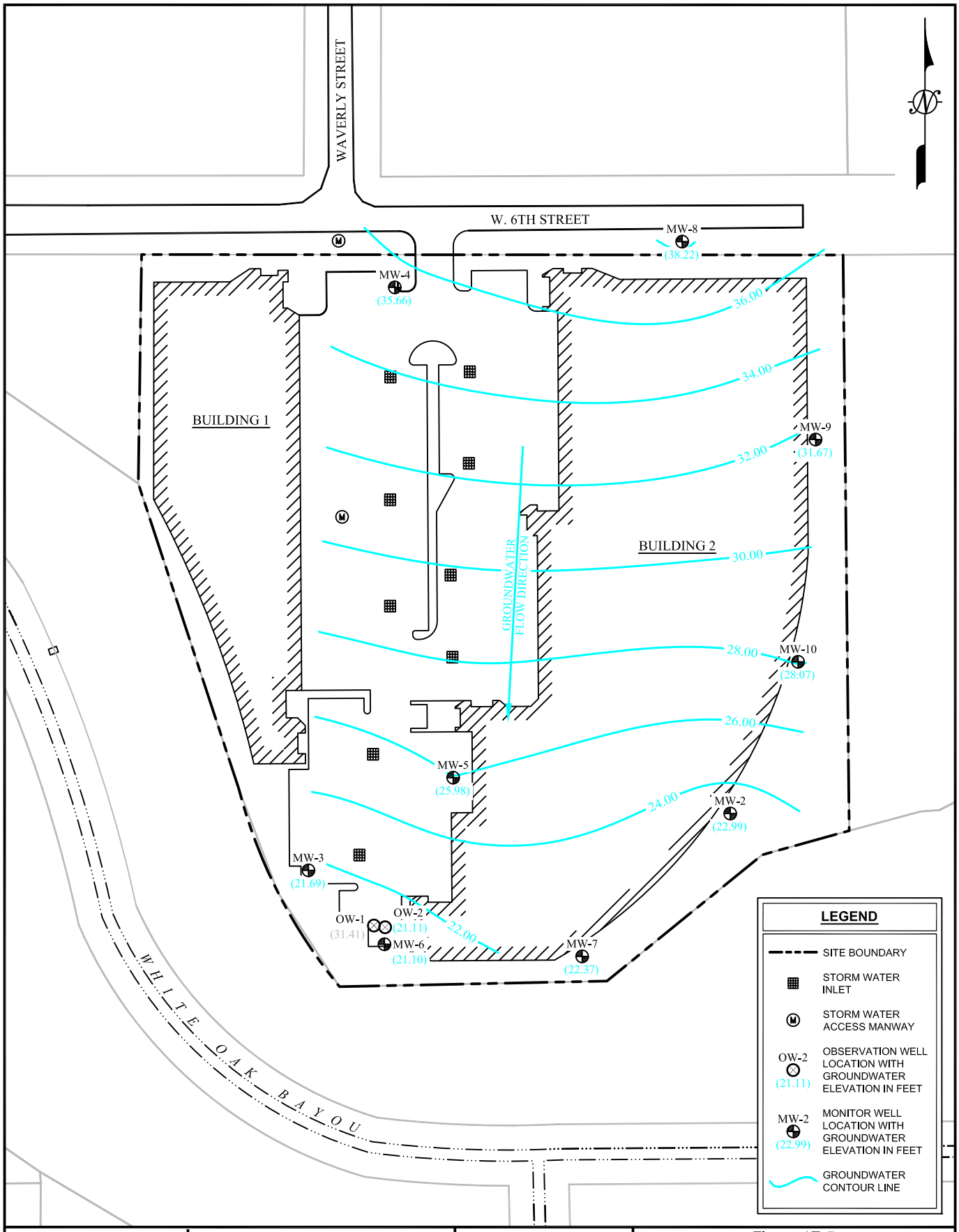
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1E-4
Groundwater Gradient Map
October 19, 2010
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-5.dwg : Less OW-1

0 60' 120'

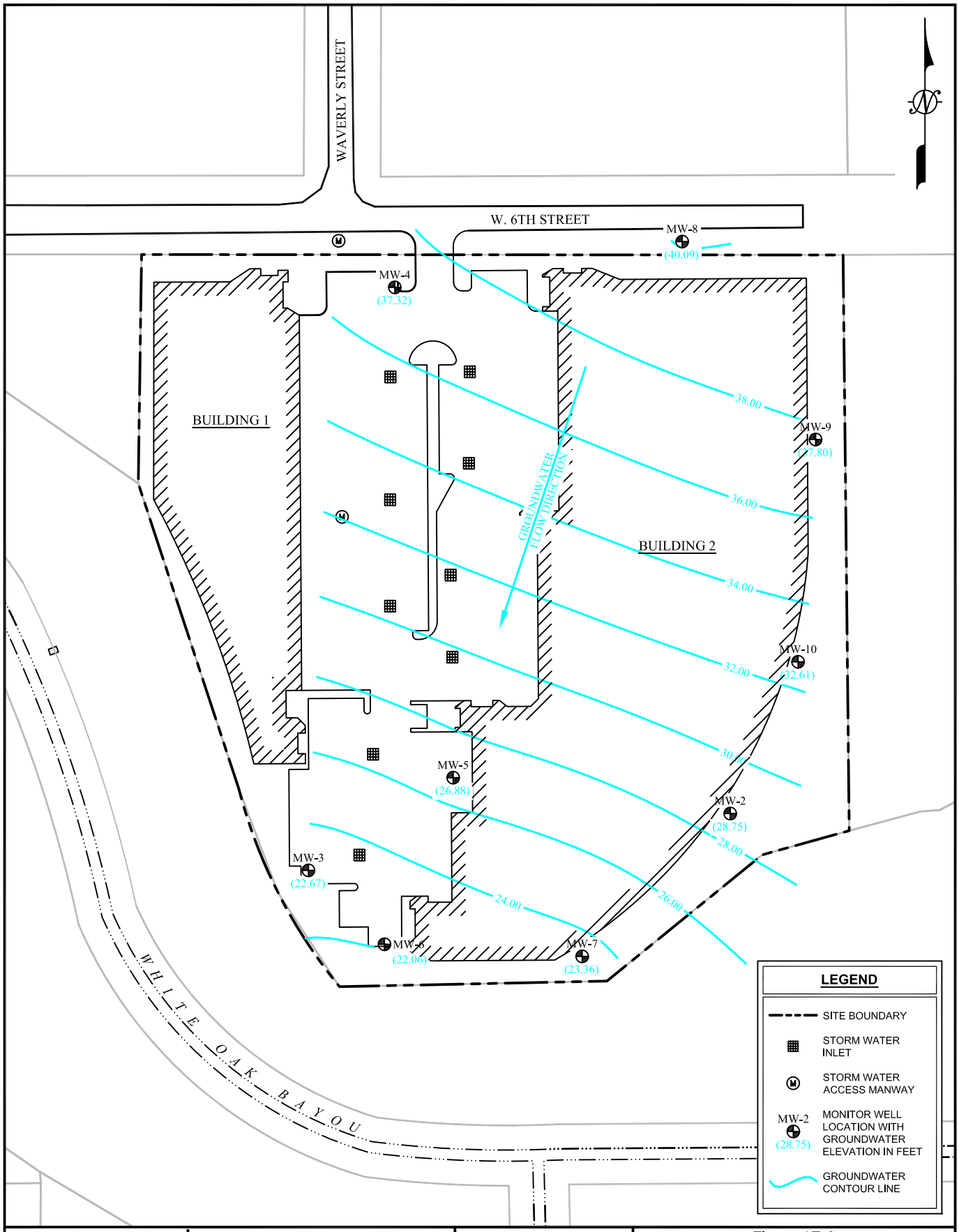
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1E-5
Groundwater Gradient Map
January 20, 2010
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-6.dwg : No OWs

0 60' 120'

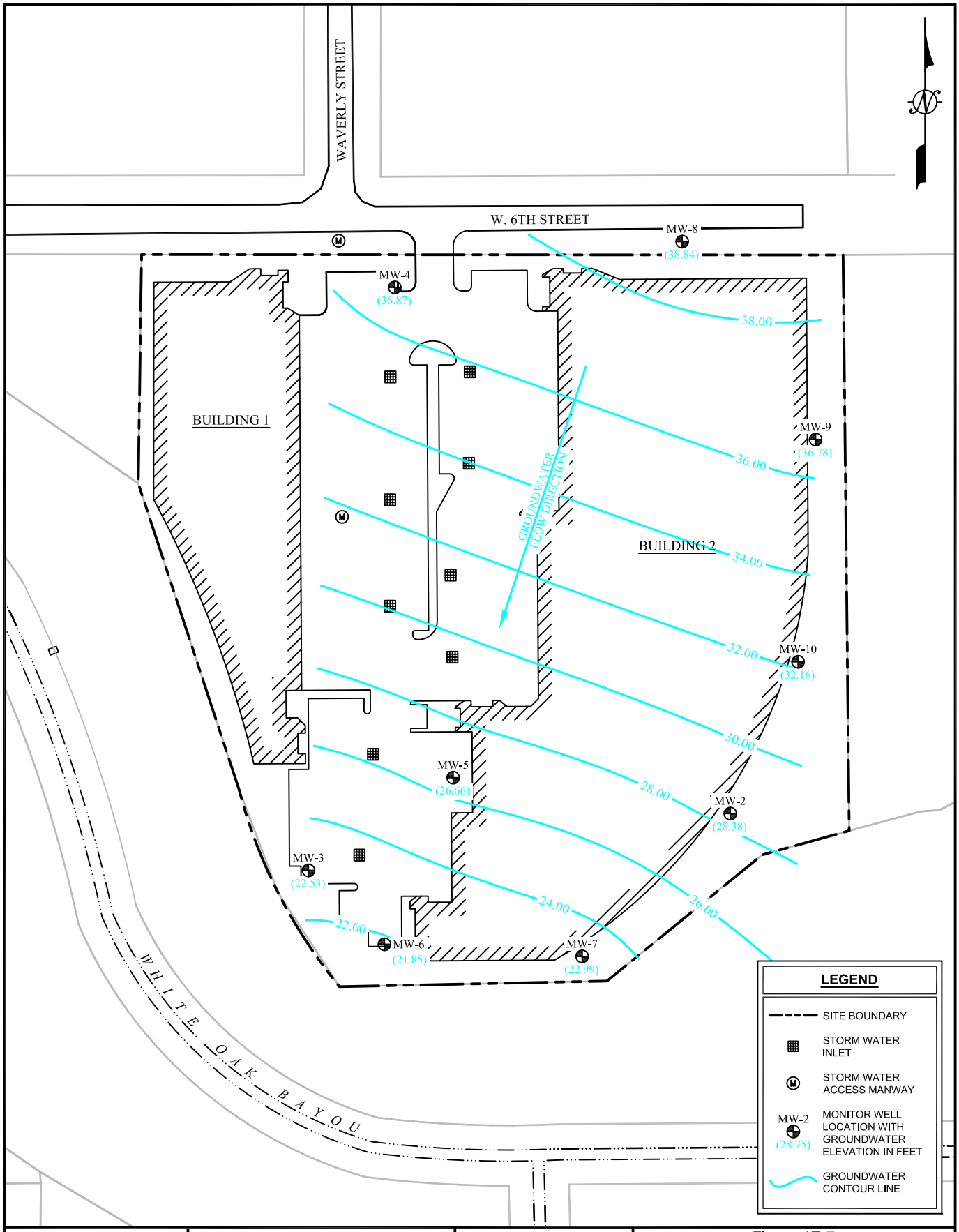
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	11-19-2013

Figure 1E-6
Groundwater Gradient Map
March 11, 2008
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1E-7.dwg : No OWs

0 60' 120'

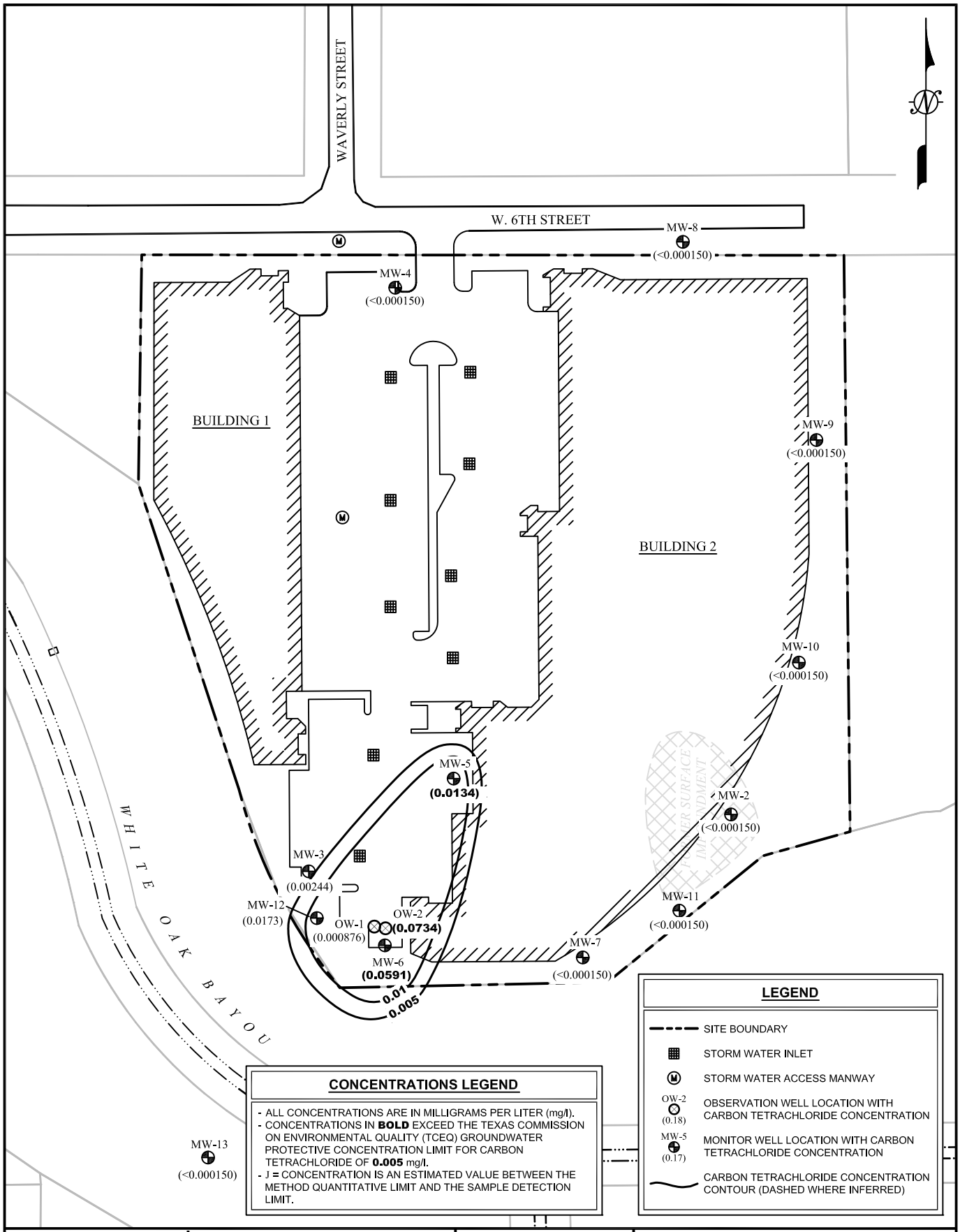
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	11-19-2013

Figure 1E-7
Groundwater Gradient Map
January 10, 2002
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1F-1.dwg : Figure 1F-1

0 60' 120'

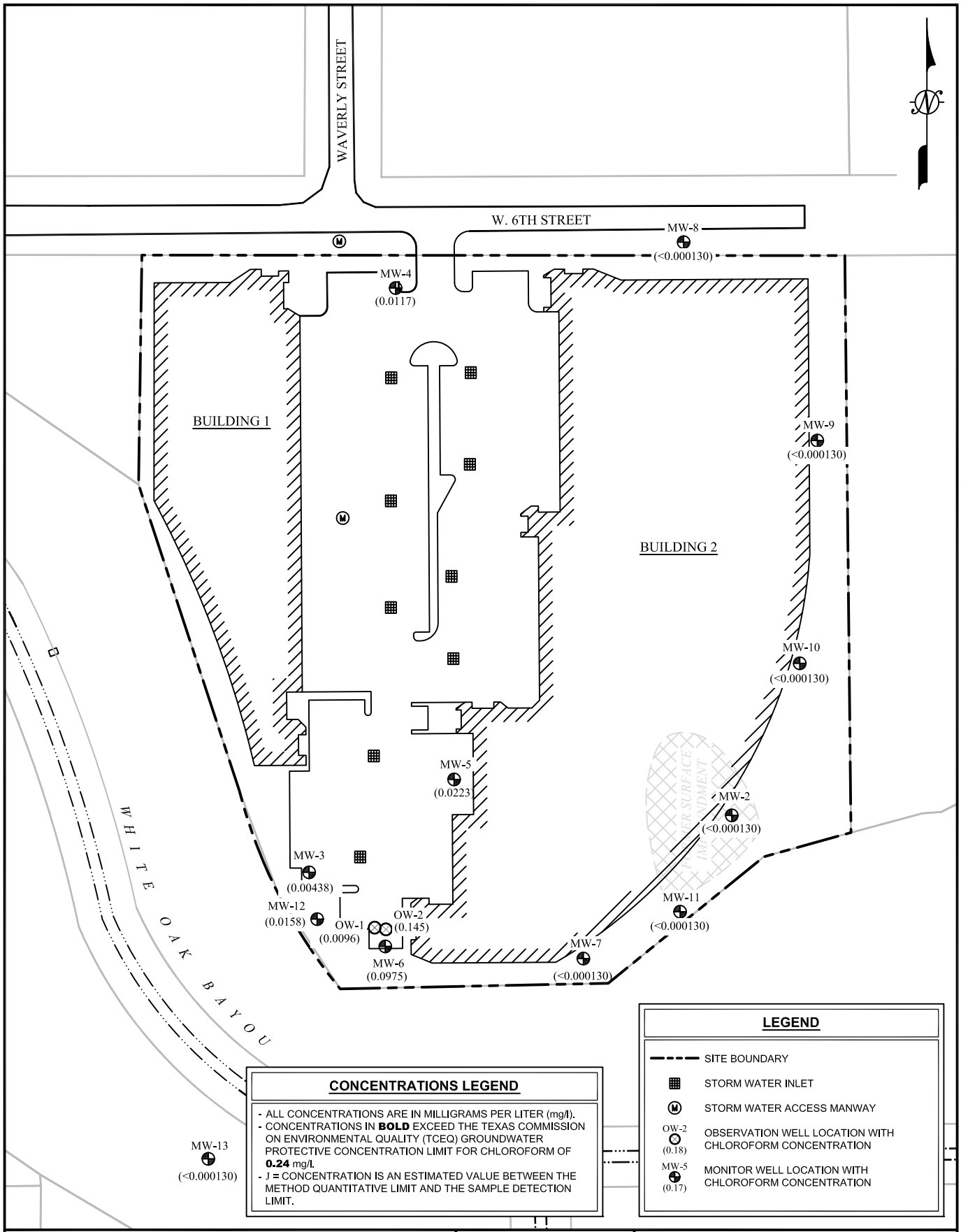
APPROXIMATE SCALE 1"= 120'

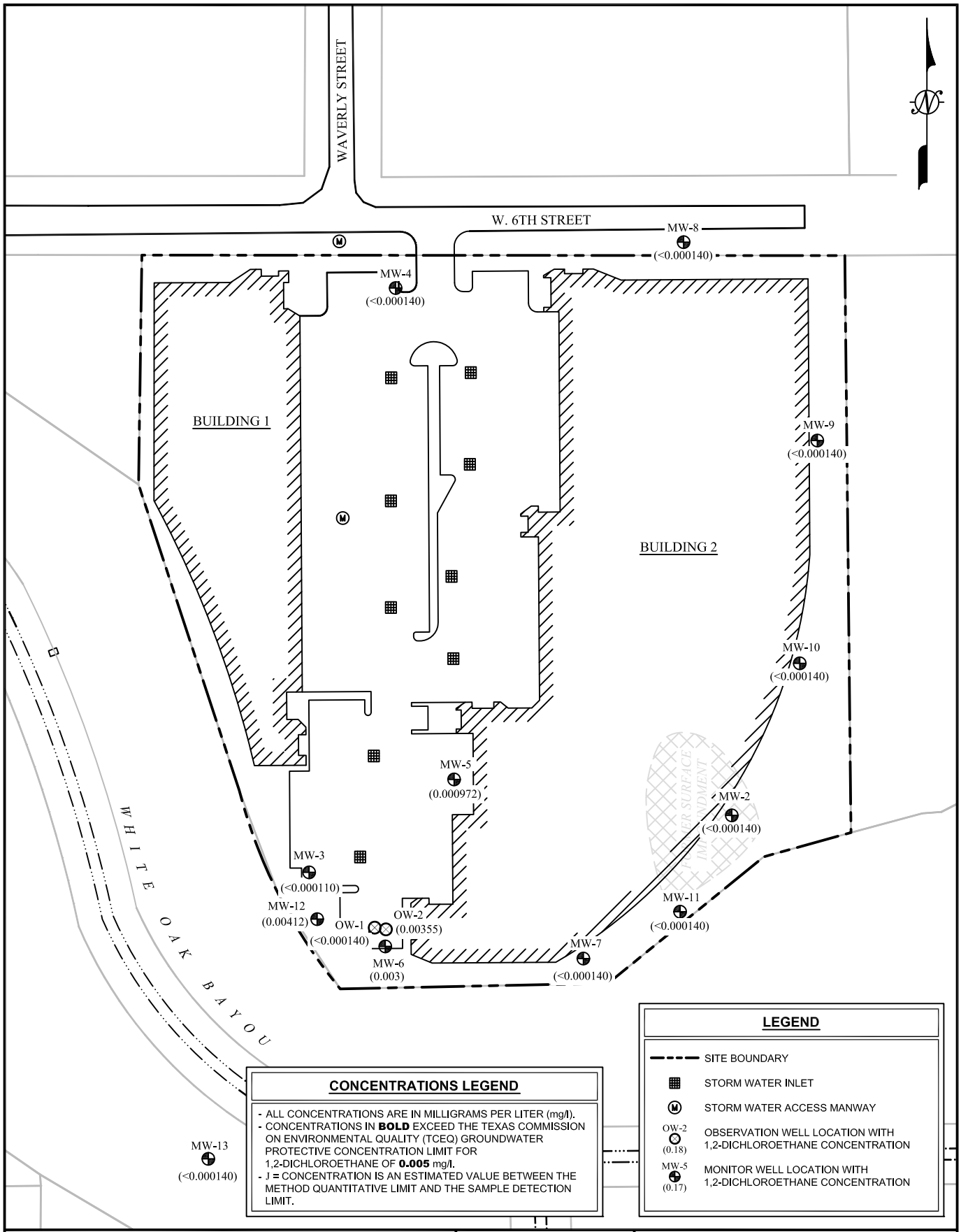
Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1F-1
Groundwater COC Conc. Map - Carbon Tetrachloride
(March, 2013)
Central Industrial Park
600-720 W. 6th Street
Houston, Texas


WAVERLY STREET
W. 6TH STREET
MW-8
(<0.000130)
MW-4
(0.0117)
BUILDING 1
BUILDING 2
MW-9
(<0.000130)
MW-10
(<0.000130)
MW-5
(0.0223)
MW-2
(<0.000130)
MW-3
(0.00438)
MW-12
(0.0158)
OW-1
(0.0096)
OW-2
(0.145)
MW-6
(0.0975)
MW-7
(<0.000130)
MW-11
(<0.000130)
MW-13
(<0.000130)
WHITE OAK BAYOU
LEGEND
SITE BOUNDARY
STORM WATER INLET
STORM WATER ACCESS MANWAY
OW-2 (0.18) OBSERVATION WELL LOCATION WITH CHLOROFORM CONCENTRATION
MW-5 (0.17) MONITOR WELL LOCATION WITH CHLOROFORM CONCENTRATION
CONCENTRATIONS LEGEND
- ALL CONCENTRATIONS ARE IN MILLIGRAMS PER LITER (mg/l).
- CONCENTRATIONS IN BOLD EXCEED THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) GROUNDWATER PROTECTIVE CONCENTRATION LIMIT FOR CHLOROFORM OF 0.24 mg/l.
- J = CONCENTRATION IS AN ESTIMATED VALUE BETWEEN THE METHOD QUANTITATIVE LIMIT AND THE SAMPLE DETECTION LIMIT.
0 60' 120'
APPROXIMATE SCALE 1"= 120'
Terracon
Consulting Engineers & Scientists
TERRACON NO: 92137736
DRAWN BY: AD
CHECKED BY: AN
SCALE: AS SHOWN
DATE: 12-2-2013
Figure 1F-2
Groundwater COC Conc. Map - Chloroform
(March, 2013)
Central Industrial Park
600-720 W. 6th Street
Houston, Texas
N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1F-2.dwg : Figure 1F-2



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1F-3.dwg : Figure 1F-3

0 60' 120'

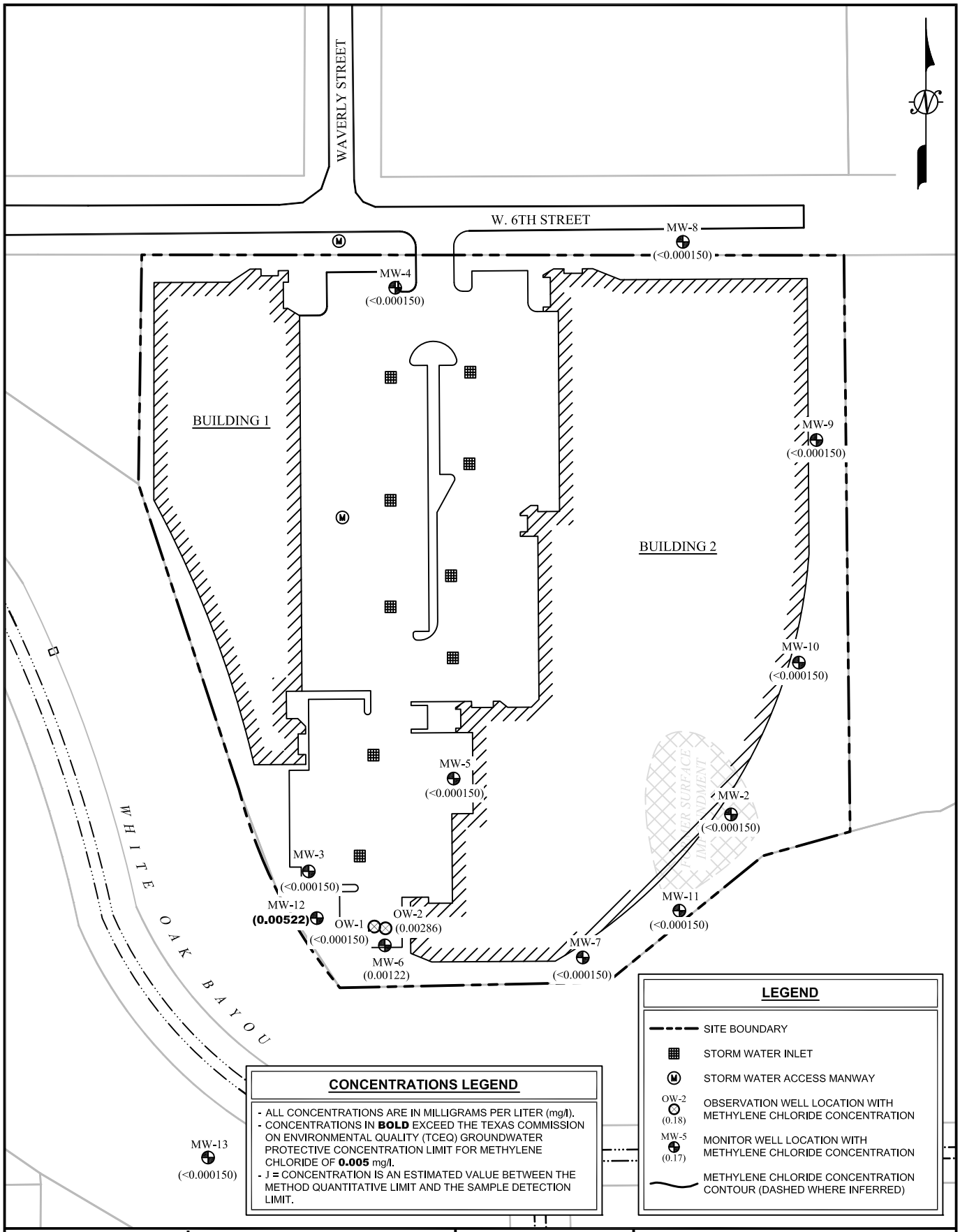
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1F-3
Groundwater COC Conc. Map - 1,2-Dichloroethane
(March, 2013)
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1F-4.dwg : Figure 1F-4

0 60' 120'

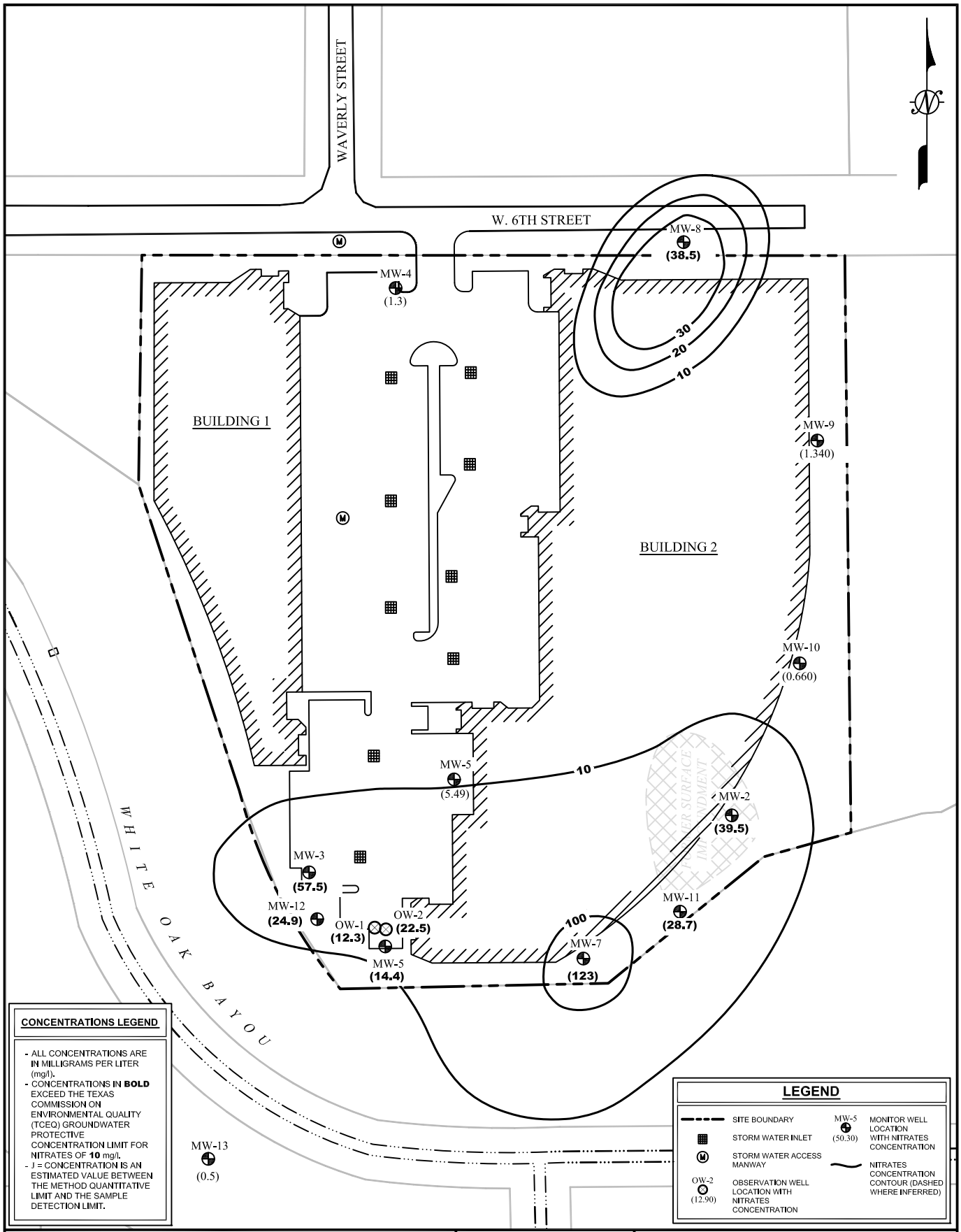
APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1F-4
Groundwater COC Conc. Map - Methylene Chloride
(March, 2013)
Central Industrial Park
600-720 W. 6th Street
Houston, Texas



0 60' 120'

APPROXIMATE SCALE 1"= 120'

Terracon
Consulting Engineers & Scientists

TERRACON NO: 92137736

DRAWN BY:	AD
CHECKED BY:	AN
SCALE:	AS SHOWN
DATE:	12-2-2013

Figure 1F-5
Groundwater COC Conc. Map - NItrates
(March, 2013)
Central Industrial Park
600-720 W. 6th Street
Houston, Texas

N:\ENV\dox\2013\Drafting\92137736\92137736 Figure 1F-5.dwg : Figure 1F-5

APPENDIX D

Appendix D

Provide for each contaminant of concern within the designated groundwater:

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).*

For response to item a. above, see the Figures 1C and Figures 1F-1 through 1F-5 in Appendix C and Table 1. For response to items b. and c., see Table 1.

Based on the environmental investigations completed at the designated property, five contaminants of concern (COCs) have been identified in the groundwater above the ingestion protective concentration level (PCL). Table 1 lists the COCs exceeding the ingestion PCLs.

The concentrations of COCs identified in groundwater beneath the designated property are all below the applicable non-ingestion PCL ($^{Air}Soil_{Inh\text{-}V}$).

APPENDIX D

TABLE 1: COCs EXCEEDING INGESTION PCLs IN GROUNDWATER

Central Industrial Park
600-720 West 6th Street
Houston, Texas
(all concentrations are in milligrams per liter)

COC: Carbon Tetrachloride		
Maximum Concentration Detected		**2.9**
Ingestion-Based PCL (Residential ${}^{GW}GW_{Ing}$)		0.005
Ingestion-Based PCLE Zone:	Length (ft):	264
	Width (ft):	138
	Aprox. Total Area (ft^2):	34,400
	Minimum Depth (bgs)	29
	Maximum Depth (bgs)	35
Non-Ingestion-Based PCL (${}^{Air}GW_{Inh-V}$)		20
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:		153.82
Specific Gravity:		1.594
Solubility in Water:		805 mg/l

COC: Chloroform		
Maximum Concentration Detected		**0.660**
Ingestion-Based PCL (Residential ${}^{GW}GW_{Ing}$)		0.24
Ingestion-Based PCLE Zone:	Length (ft):	None (PCL not exceeded in the latest sample)
	Width (ft):	
	Total Area (ft^2):	
	Minimum Depth (bgs)	29
	Maximum Depth (bgs)	35
Non-Ingestion-Based PCL (${}^{Air}GW_{Inh-V}$)		20
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:		119.38
Specific Gravity:		1.484
Solubility in Water:		7,920 mg/l

COC: 1,2-Dichloroethane		
Maximum Concentration Detected		**0.029**
Ingestion-Based PCL (Residential ${}^{GW}GW_{Ing}$)		0.005
Ingestion-Based PCLE Zone:	Length (ft):	None (PCL not exceeded in the latest sample)
	Width (ft):	
	Total Area (ft^2):	
	Minimum Depth (bgs)	28
	Maximum Depth (bgs)	33
Non-Ingestion-Based PCL (${}^{Air}GW_{Inh-V}$)		33
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:		98.96
Specific Gravity:		1.2351
Solubility in Water:		8,700 mg/l

COC: Methylene Chloride		
Maximum Concentration Detected		**0.014**
Ingestion-Based PCL (Residential ${}^{GW}GW_{Ing}$)		0.005
Ingestion-Based PCLE Zone:	Length (ft):	None (PCL not exceeded in the latest sample)
	Width (ft):	
	Total Area (ft^2):	
	Minimum Depth (bgs)	29
	Maximum Depth (bgs)	35
Non-Ingestion-Based PCL (${}^{Air}GW_{Inh-V}$)		21,000
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:		84.93
Specific Gravity:		1.3266
Solubility in Water:		15,400 mg/l

COC: Nitrates		
Maximum Concentration Detected		**770**
Ingestion-Based PCL (Residential ${}^{GW}GW_{Ing}$)		10
Ingestion-Based PCLE Zones (two areas):	Length (ft):	Width (ft):
	510	414
	222	144
	Total Area (ft^2): (133900+ 29800)	163,700
	Minimum Depth (bgs)	25
	Maximum Depth (bgs)	30
Non-Ingestion-Based PCL (${}^{Air}GW_{Inh-V}$)		Not Established
Non-Ingestion-Based PCLE Zone		None
Geochemical/Physical Properties		
Molecular Weight:		62
Specific Gravity:		-
Solubility in Water:		Soluble

APPENDIX E

Appendix E

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

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

Table 1 and Table 2 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 exceedances.

APPENDIX E

TABLE 1: MAXIMUM CONCENTRATIONS TABLE-SOIL
Central Industrial Park
600-720 West 6th Street
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)				
Nitrate	19	130,000	NE	MW-12	8-10	10/14/2010	**150**
Carbon Tetrachloride	0.062	35	60	MW-6	40-41	5/17/1995	**0.600**

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

APPENDIX E

TABLE 2: MAXIMUM CONCENTRATIONS TABLE-GROUNDWATER

Central Industrial Park
600-720 West 6th Street
Houston, Texas
(all concentrations are in milligrams per liter)

Contaminants of Concern (COCs)	Ingestion-Based PCL	Non-Ingestion-Based PCL	Sample ID	Sample Date	Maxium COC Concentrations (mg/l)
	$^{GW}GW_{Ing}$ (without MSD)	$^{Air}GW_{Inh-V}$ (with MSD)			
Benzene	0.005	180	OW-2	3/20/1996	**0.011**
Carbon Tetrachloride	0.005	20	MW-6	3/20/1996	**2.900**
Chloroform	0.24	20	MW-6	3/20/1996	**0.660**
1,2-Dichloroethane	0.005	33	MW-3	5/17/1995	**0.029**
Methylene Chloride	0.005	1,300	MW-3	5/17/1995	**0.012**
Nitrate	10	NE	MW-3	1/10/2002	**429**
Tetrachloroethene (PCE)	0.005	500	MW-3	3/20/1991	**0.012**

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

APPENDIX F

Appendix F

If the plume extends beyond the limits of property owners listed in this application, list the owners of the additional property beneath which the plume(s) extend(s), and a summary of interactions with those property owners about the plume(s) and this MSD application. Please Note: You are not required under this item to notify affected property owners, only to provide a summary or who affected property owners are, and if there have been any communications. "No contact" can be an acceptable answer.

Commercial/Industrial property north of the site

Although the COC (nitrate) plume borders the southern boundary of the off-site property north of the site, the property is not considered to be affected because groundwater gradient in the area is consistently toward the south. There have been no communications with the property owner.

Harris County Flood Control District (HFCID) White Oak Easement to the south of the site

The aerial extent of the nitrate plume extends to the northern portion of HFCID White Oak bayou easement. The HFCID granted permission to install a monitor well (MW-13) south of the White Oak bayou during 2013 assessment activities. The well was installed and sampled in February-March 2013 and plugged and abandoned in September 2013, with TCEQ approval. The groundwater sample collected and analyzed from monitor well MW-13 did not contain COCs above laboratory sample detection limits (SDLs) with a minor exception of a nitrate (0.5 milligrams per liter (mg/L)) detected at a concentration well below its assessment level (10 mg/L).

There have been no further communications with HFCID; however, both the HFCID and property to the north will receive notice of this MSD application as owners of real property within 2500 feet of the boundary of the designated property.

APPENDIX G

Appendix G

*A statement as to whether the plume of contamination is stable (i.e. no change), or contracting, and delineated, **with the basis for that statement**. Please include historical sampling data.*

Affected groundwater at the site has been fully delineated. The TCEQ considered the affected property assessment complete and approved the Affected Property Assessment Report (APAR) in October 2013. A network of 15 permanent groundwater monitor wells was used to complete the delineation. The APAR approval letter from the TCEQ dated September 17, 2013 is enclosed in this Appendix. In addition, we are enclosing a recent letter from TCEQ dated December 10, 2013 confirming that the site assessment was completed to Tier 1 PCLs for a residential site.

The suspected sources of COCs are former above-ground storage tanks (ASTs) and a pond in the southeastern portion of the site, operated by Swift Chemical Company, the former owner/operator of the site. The Swift facility was demolished prior to 1981 and the former pond has been filled. Therefore, there are no active sources for COCs contributing to the plume.

Groundwater monitoring has been conducted at the site since 1991. Groundwater has been sampled in some wells for 13 events. Historical groundwater sampling data indicate that concentrations of carbon tetrachloride, chloroform, 1,2-Dichloroethane, methylene chloride, and nitrate are naturally attenuating—concentrations have steadily decreased over time. The results of the latest sampling event completed in March 2013 further indicate that only three of COCs (carbon tetrachloride, methylene chloride, and nitrates) remain at concentrations above critical PCLs. Therefore, as reported in the APAR and groundwater monitoring reports submitted to the TCEQ for the designated property, groundwater plumes for all COCs have been delineated in all directions and the groundwater plumes are stable or declining. A table showing historical groundwater sampling data is included as Table G-1.

Additionally, due to the proximity of White Oak Bayou to the site, four surface water samples (SW-1 through SW-4) were collected as part of site assessment activities. These surface water sample locations are shown Appendix C-Figure 1D. A table showing surface water sampling data is included as Table G-2. The surface water samples did not contain COCs at concentrations above the PCLs.

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 17, 2013

Ms. Fran Phillips
Gardere Wynne Sewell LLP
3000 Thanksgiving Tower
1601 Elm Street
Dallas, TX 75201

Re: Approval of Affected Property Assessment Report (APAR) with Comments
Approval of Response Action Plan (RAP) with Comments
APAR dated May 23, 2013 and RAP dated August 13, 2013
Central Industrial Park
600-720 West 6th Street, Houston, TX
TCEQ Facility ID T-1715; TCEQ Agreed Order Docket 2007-0969-IHW-E; EPA ID TXR000079133; Customer CN603130667; Regulated Entity RN104621412

Dear Ms. Phillips:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced submittals. Swift Chemical Company occupied this site until 1975. Limited information was available about the company, but it is assumed the site was used for manufacturing and/or mixing of agricultural chemicals. A single-story structure was located near the center of the site with a surface impoundment to the southeast. The Swift facility was demolished in 1981. The Central Park complexes were built in 1984 and provide commercial space to tenants such as a sports equipment manufacturer and distributor, a moving and storage facility, and a wholesale food distributor. Monitoring wells installed at the site for a Phase II investigation in 1991 detected carbon tetrachloride, chloroform, and PCE above protective concentration limits (PCLs). Monitoring has been conducted periodically at the site since 1991.

Based on our review, the TCEQ concurs that the APAR investigation has been completed in accordance with 30 Texas Administrative Code (TAC) §350.51, with the following comments:

The April 29, 2011 TCEQ letter approved the APAR with the exception of the delineation of nitrates and carbon tetrachloride in groundwater on the southern end of the site. A monitoring well (MW-13) was installed to the southwest of the site on the opposite side of the White Oak Bayou (a concrete drainage ditch). Due to the steep grade at the ditch, it was not possible to install a well on the property side of the ditch downgradient from the existing wells (per a July 9, 2013 telephone call with Prasad Rajulu of Terracon). Concentrations of chemicals of concern (COCs) were below PCLs in MW-13. Surface water samples taken from the ditch were also below PCLs. TCEQ concurs that an appropriate effort was made and concentrations of COCs are delineated in groundwater for the purposes of the APAR.

TCEQ also received the RAP for the Central Industrial Park. Based on the most recent groundwater monitoring event in March-April of 2013, carbon tetrachloride, methylene

chloride, and nitrate remain above critical PCLs at the site. Soil samples were most recently taken in 2010, and nitrate was found above the commercial/industrial PCL, but below the $^{Total}Soil_{Combined}$ PCL. The PCL exceedances in soil vary from four to thirty feet below ground surface.

Based on the TCEQ review, the RAP fulfills the requirements of 30 Texas Administrative Code (TAC) §350.94. The RAP proposes Remedy Standard B consisting of monitored natural attenuation (MNA) in a plume management zone (PMZ). Because monitoring wells could not be installed downgradient of the existing wells on the southern end of the site, there is uncertainty about the precise location of the plume; therefore, the PMZ should extend to the bayou. Based on e-mail correspondence with Prasad Rajulu of Terracon on August 21 and 28 of 2013, the existing wells at the site (MW-2 through MW-12 and OW-1 and Ow-2) will be used as attenuation monitoring points. The most recent COC concentration data will serve as the attenuation action levels. Groundwater monitoring reports are required to be submitted to the TCEQ for review for three semi-annual monitoring events in order to confirm that the plume continues to be stable. This monitoring should also serve to demonstrate that nitrate in the soil is not migrating and increasing concentrations in groundwater.

A restrictive covenant for commercial/industrial land use and prohibition of the use of groundwater is also proposed. For Remedy Standard B groundwater response actions proposed pursuant to §350.33(f)(2), §350(f)(3)(F), §350.33(f)(4)(C)(i), TCEQ must approve the language of the institutional control and proof of filing must be submitted within 120 days of the date of this letter. In addition to groundwater, the presence of COCs above commercial/industrial PCLs in soil should be addressed in the restrictive covenant.

Finally, the TCEQ concurs that off-site MW-13 can be plugged and abandoned. Please submit information documenting the proper plugging and abandonment in accordance with 16 Texas Administrative Code (TAC) Chapter 76. Additional guidance and required forms related to proper plugging and abandonment of wells may be obtained from the Texas Department of Licensing and Regulation's website: http://www.license.state.tx.us/wwd/wwd.htm.

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual response action fails to comply with these requirements, please take any necessary and authorized action to correct such conditions. A TCEQ field inspector may conduct an inspection of your site to determine compliance with the report.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office.

Sincerely,

Stephanie Kirschner, AICP, Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

SDK/mdh

cc: Prasad Rajulu; Terracon; 11555 Clay Road; Houston, TX 77043
Jason Ybarra, Waste Section Manager, TCEQ Region 12 Office, Houston

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 10, 2013

Ms. Fran Phillips
Gardere Wynne Sewell LLP
3000 Thanksgiving Tower
1601 Elm Street
Dallas, TX 75201

Re: Residential Assessment Levels
December 2, 2013 Phone Call with Prasad Rajulu of Terracon
APAR dated May 23, 2013 and RAP dated August 13, 2013
Central Industrial Park
600-720 West 6th Street, Houston, TX
TCEQ Facility ID T-1715; TCEQ Agreed Order Docket 2007-0969-IHW-E; EPA ID TXR000079133; Customer CN603130667; Regulated Entity RN104621412

Dear Ms. Phillips:

It has been requested that the Texas Commission on Environmental Quality's (TCEQ's) letter of September 17, 2013 approving the Affected Property Assessment Report (APAR) and Response Action Plan (RAP) be amended to reflect the residential level of assessment at the above-mentioned site.

The site was assessed based on Tier 1 Residential PCLs; however, concentrations of COCs are still above residential PCLs in subsurface soil for nitrates and carbon tetrachloride. There are also exceedances in groundwater for nitrates, carbon tetrachloride, and methylene chloride. A deed recordation of any exceedances remaining in place would be necessary to achieve residential closure. For Remedy Standard B groundwater response actions proposed pursuant to §350.33(f)(2), §350(f)(3)(F), §350.33(f)(4)(C)(i), TCEQ must approve the language of the institutional control and proof of filing must be submitted within 120 days of the date of this letter.

All other actions proposed in the approved RAP remain the same, until the time a Municipal Setting Designation is approved by the City of Houston and TCEQ. The RAP proposed Remedy Standard B, consisting of monitored natural attenuation (MNA) in a plume management zone (PMZ), as well as a restrictive covenant prohibiting the use of groundwater. Because monitoring wells could not be installed downgradient of the existing wells on the southern end of the site, there is uncertainty about the precise location of the plume; therefore, the PMZ should extend to the bayou. Based on e-mail correspondence with Prasad Rajulu of Terracon on August 21 and 28 of 2013, the existing wells at the site (MW-2 through MW-12 and OW-1 and Ow-2) will be used as attenuation monitoring points. The most recent COC concentration data will serve as the attenuation action levels. Groundwater monitoring reports are required to be submitted to the

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TCEQ for review for three semi-annual monitoring events in order to confirm that the plume continues to be stable. This monitoring should also serve to demonstrate that COCs in the soil are not migrating and increasing concentrations in groundwater.

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual response action fails to comply with these requirements, please take any necessary and authorized action to correct such conditions. A TCEQ field inspector may conduct an inspection of your site to determine compliance with the report.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office.

Sincerely,

Stephanie Kirschner, AICP, Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

SDK/mdh

cc: Prasad Rajulu; Terracon; 11555 Clay Road; Houston, TX 77043
Jason Ybarra, Waste Section Manager, TCEQ Region 12 Office, Houston

TABLE G-1

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

Central Industrial Park
600-720 West 6th Street
Houston, Texas

Concentrations are in milligrams per liter

Well Number	Date	4-Methyl-2-pentanone	Acetone	Benzene	Carbon Disulfide	Chlorobenzene	Carbon Tetrachloride	Chloroform	1,1-Dichloroethane	1,1-Dichloroethene	1,2-Dichloroethane	Methylene Chloride	Methyl-tert butyl ether	Naphthalene	Tetrachloroethene	Toluene	0-Xylene	Nitrates	Nitrite	Total Organic Carbon
TRRP Assessment Level		**2**	**22**	**0.005**	**2.4**	**0.1**	**0.005**	**0.24**	**4.9**	**0.007**	**0.005**	**0.005**	**0.24**	**0.49**	**0.005**	**1.0**	**10**	**10**	**1**	-
TRRP Tier 1 Critical PCL		**5.8**	**66**	**0.005**	**7.3**	**0.1**	**0.005**	**0.73**	**15**	**0.007**	**0.005**	**0.005**	**0.73**	**1.5**	**0.005**	**1.0**	**10**	**10**	**1**	-
MW-1	03/20/91	<SDL	<0.010	<0.005	<SDL	<SDL	**1.500**	0.098	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	06/29/94	<SDL	<0.100	NA	<SDL	<SDL	<0.002	<0.001	NA	<SDL	NA	NA	NA	<SDL	<0.001	<SDL	NA	NA	NA	NA
	Destroyed prior to January 2002																			
MW-2	03/20/91	<SDL	<0.010	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	05/10/95	<SDL	<0.005	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	05/17/95	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	-	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	-	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	-	NA	<10	17.9
	03/12/08	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.00060	<0.00050	<0.00050	<SDL	<0.00050	<0.00060	0.0057	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**109**	<0.0300	NA
	10/19/10	<SDL	<0.00200	0.000199 J	<0.0000700	<0.000110	<0.000130	0.000162 J	<0.000160	<SDL	<0.000130	<0.000420	<0.000150	<SDL	<0.0000800	<SDL	<0.000120	**210**	NA	NA
	07/20/11	<SDL	<0.000990	0.000144 J	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**91.5**	NA	NA
	10/28/11	<SDL	<0.000990	0.000147 J	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.000131 J	<SDL	<0.000130	<SDL	<0.000120	**68.6**	NA	NA
	03/19/13	<SDL	0.00414	0.000187 J	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**39.5**	<0.525	NA
MW-3	03/20/91	<SDL	<0.010	<0.005	<SDL	<SDL	**0.720**	0.110	<0.005	<SDL	<0.005	<0.005	NA	<SDL	**0.012**	<SDL	<0.005	NA	NA	NA
	06/29/94	<SDL	<0.100	NA	<SDL	<SDL	**0.0258**	0.0143	NA	<SDL	NA	NA	NA	<SDL	<0.001	<SDL	NA	NA	NA	NA
	01/09/95	<SDL	NA	NA	<SDL	<SDL	**0.765**	**0.318**	<0.005	<SDL	NA	NA	NA	<SDL	NA	<SDL	NA	NA	NA	NA
	05/10/95	<SDL	<0.500	<0.050	<SDL	<SDL	**0.900**	**0.370**	<0.050	<SDL	<0.050	<0.100	NA	<SDL	<0.050	<SDL	<0.050	NA	NA	NA
	05/17/95	<SDL	<0.050	<0.005	<SDL	<SDL	**0.880**	**0.370**	<0.005	<SDL	**0.029**	**0.012**	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/20/96	<SDL	<0.050	<0.005	<SDL	<SDL	**0.620**	**0.370**	<0.005	<SDL	**0.028**	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	**0.104**	0.188	<0.005	<SDL	**0.018**	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**429**	NA	22.4
	03/13/08	<SDL	<0.010	<0.0050	<SDL	<SDL	**0.013**	0.033	<0.0050	<SDL	**0.0075**	**0.0056 J**	0.0075	<SDL	<0.0050	<SDL	NA	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	0.0026 J	0.0057	<0.00050	<SDL	0.0033 J	0.0015 J	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**78.6**	<0.0300	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	0.00222	0.00492	<0.000160	<SDL	**0.00513**	<0.000420	0.000168 J	<SDL	<0.0000800	<SDL	<0.000120	**70.1**	NA	NA
	07/21/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	0.00191 J	0.00469	<0.000110	<SDL	0.00386	<0.000150	0.000685 J	<SDL	<0.000130	<SDL	<0.000120	**72.2**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	0.00383	<0.000110	<SDL	0.00308	<0.000150	0.000195 J	<SDL	<0.000130	<SDL	<0.000120	**68.3**	NA	NA
	04/16/13	<0.000450	<0.000990	<0.0000800	<0.000240	<0.000120	0.00244 J	0.00438	<0.000110	<0.000190	<0.000110	<0.000150	<0.000120	<0.000320	<0.000130	<0.000150	<0.000120	**57.5**	NA	NA
MW-4	03/20/91	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.0005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	05/10/95	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/09/95	<SDL	NA	NA	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	NA	NA	NA	<SDL	NA	<SDL	NA	NA	NA	NA
	05/17/95	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**213**	NA	17.3
	03/12/08	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.00060	<0.00050	<0.00050	<SDL	<0.00050	<0.00060	0.0012 J	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/22/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**19.5**	0.293	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	<0.000130	<0.000120	<0.000160	<SDL	<0.000130	<0.000420	0.00140	<SDL	<0.0000800	<SDL	<0.000120	**27.8**	NA	NA
	07/20/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.00122	0.000912 Jb	<0.000130	<SDL	<0.000120	**23.1**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	0.000164 J	<0.000110	<SDL	<0.000140	<0.000150	0.00075	<SDL	<0.000130	<SDL	<0.000120	**32.0**	NA	NA
	03/19/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	0.0117	<0.000110	<0.000190	<0.000140	<0.000150	<0.000120	<0.000320	<0.000130	<SDL	<0.000120	1.3	<0.105	NA

TABLE G-1

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

Central Industrial Park
600-720 West 6th Street
Houston, Texas

Concentrations are in milligrams per liter

Well Number	Date	4-Methyl-2-pentanone	Acetone	Benzene	Carbon Disulfide	Chlorobenzene	Carbon Tetrachloride	Chloroform	1,1-Dichloroethane	1,1-Dichloroethene	1,2-Dichloroethane	Methylene Chloride	Methyl-tert butyl ether	Naphthalene	Tetrachloroethene	Toluene	0-Xylene	Nitrates	Nitrite	Total Organic Carbon
TRRP Assessment Level		**2**	**22**	**0.005**	**2.4**	**0.1**	**0.005**	**0.24**	**4.9**	**0.007**	**0.005**	**0.005**	**0.24**	**0.49**	**0.005**	**1.0**	**10**	**10**	**1**	-
TRRP Tier 1 Critical PCL		**5.8**	**66**	**0.005**	**7.3**	**0.1**	**0.005**	**0.73**	**15**	**0.007**	**0.005**	**0.005**	**0.73**	**1.5**	**0.005**	**1.0**	**10**	**10**	**1**	-
MW-5	05/17/95	<SDL	<0.050	<0.005	<SDL	<SDL	**1.5**	0.033	<0.005	<SDL	**0.016**	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	**1.1**	0.200	<0.005	<SDL	**0.0130**	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	**0.180**	0.085	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**278**	NA	5.0
	03/13/08	<SDL	0.0052 J	<0.00060	<SDL	<SDL	**0.019**	0.033	0.0012 J	<SDL	0.0010 J	0.0016 J	<0.00050	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/22/10	<SDL	0.0023 J	<0.00050	<SDL	<SDL	**0.011**	0.014	0.00056 J	<SDL	<0.00050	0.0011 J	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**50.3**	0.0780 J	NA
	10/19/10	0.000626 J	<0.00200	<0.000130	<0.0000700	<0.000110	**0.0321**	0.0419	0.00175	<SDL	0.00167	0.00229	<0.000150	<SDL	0.000184 J	<SDL	<0.000120	**16.8**	NA	NA
	07/21/11	<SDL	0.00449	<0.0000800	<0.000240	<0.000120	**0.0139**	0.0215	0.000883 J	<SDL	0.000800 J	0.00102	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**26.1**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	**0.0236**	0.0320	0.00126	<SDL	0.00105	0.00203	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**13.3**	NA	NA
	03/19/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	**0.0134**	0.0223	0.00125	<SDL	0.000972 J	<0.000150	<0.000120	<0.000320	<0.000130	<SDL	<0.000120	**5.49**	<0.105	NA
MW-6	05/18/95	<SDL	<0.050	<0.005	<SDL	<SDL	**2.500**	**0.590**	<0.005	<SDL	**0.023**	**0.014**	NA	<SDL	<0.005	<SDL	0.012	NA	NA	NA
	03/20/96	<SDL	<0.050	**0.008**	<SDL	<SDL	**2.900**	**0.660**	<0.005	<SDL	**0.025**	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	**0.551**	0.200	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**244**	NA	8.3
	03/13/08	<SDL	<0.0025	0.0016 J	<SDL	<SDL	**0.28**	0.23	0.0038 J	<SDL	**0.0067**	**0.0079 J**	<0.00050	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	**0.17**	0.17	0.0029 J	<SDL	0.0039 J	**0.0081 J**	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**25.4**	<0.0030	NA
	10/19/10	<SDL	<0.00200	0.000377	0.000968 J	0.000169 J	**0.198**	**0.243**	0.00360	0.000181 J	**0.00525**	**0.00916**	<0.000150	<SDL	0.000616	<SDL	<0.000120	**24.9**	NA	NA
	07/21/11	<SDL	<0.000990	0.000142 J	0.00112	0.000172 J	**0.114**	0.149	0.00309	<SDL	0.00345	**0.00806**	<0.000120	<SDL	0.000530 J	<SDL	<0.000120	**19.9**	NA	NA
	10/28/11	<SDL	<0.000990	0.000205 J	<0.000240	0.000158 J	**0.139**	0.155	0.00291	<SDL	0.00378	**0.00700**	<0.000120	<SDL	0.000538 J	<SDL	<0.000120	**18.5**	NA	NA
	03/19/13	<SDL	<0.000990	0.000158 J	<0.000240	<0.000120	**0.0591**	0.0975	0.00209	0.000282 J	0.003	0.00122	<0.000120	0.00137 J b	0.000389 J	<SDL	<0.000120	**14.4**	<0.105	NA
MW-7	05/18/95	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**770**	NA	29.3
	03/12/08	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.00060	<0.00050	<0.00050	<SDL	<0.00050	<0.00060	<0.00050	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**161**	<0.0300	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	<0.000130	0.00110	<0.000160	<SDL	<0.000130	<0.000420	<0.000150	<SDL	<0.0000800	<SDL	<0.000120	**197**	NA	NA
	07/20/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	0.000262 J	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**160**	NA	NA
	10/28/11	<SDL	<0.000990	0.0000872 J	<0.000240	<0.000120	<0.000150	0.000166 J	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**118 H**	NA	NA
	03/19/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**123**	<0.525	NA
MW-8	07/11/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	0.009	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**68**	NA	9.7
	03/11/08	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.00060	<0.00050	<0.00050	<SDL	<0.00050	<0.00060	<0.00050	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	<0.00050	**31.4**	<0.0300	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	<0.000130	<0.000120	<0.000160	<SDL	<0.000130	<0.000420	<0.000150	<SDL	<0.0000800	<SDL	<0.000120	**29.8**	NA	NA
	07/20/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**31.2**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**36.3**	NA	NA
	03/19/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**38.5**	<0.105	NA
MW-9	07/12/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.0050	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	**28**	NA	1.4
	03/12/08	<SDL	<0.010	<0.005	<SDL	<SDL	<0.005	<0.0050	<0.0050	<SDL	<0.0050	<0.010	<0.005	<SDL	<0.0050	<SDL	NA	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	<0.00050	0.642	<0.0300	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	<0.000130	<0.000120	<0.000160	<SDL	<0.000130	<0.000420	0.000173 J	<SDL	<0.0000800	<SDL	<0.000120	<0.0500	NA	NA
	07/20/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	0.420	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	<0.100	NA	NA
	03/20/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	1.340	0.94	NA

Project No: 92137736

TABLE G-1

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

Central Industrial Park
600-720 West 6th Street
Houston, Texas

Concentrations are in milligrams per liter

Well Number	Date	4-Methyl-2-pentanone	Acetone	Benzene	Carbon Disulfide	Chlorobenzene	Carbon Tetrachloride	Chloroform	1,1-Dichloroethane	1,1-Dichloroethene	1,2-Dichloroethane	Methylene Chloride	Methyl-tert butyl ether	Naphthalene	Tetrachloroethene	Toluene	0-Xylene	Nitrates	Nitrite	Total Organic Carbon
TRRP Assessment Level		**2**	**22**	**0.005**	**2.4**	**0.1**	**0.005**	**0.24**	**4.9**	**0.007**	**0.005**	**0.005**	**0.24**	**0.49**	**0.005**	**1.0**	**10**	**10**	**1**	-
TRRP Tier 1 Critical PCL		**5.8**	**66**	**0.005**	**7.3**	**0.1**	**0.005**	**0.73**	**15**	**0.007**	**0.005**	**0.005**	**0.73**	**1.5**	**0.005**	**1.0**	**10**	**10**	**1**	-
MW-10	07/12/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/19/96	<SDL	<0.050	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.002	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	<10	NA	28.7
	03/12/08	<SDL	<0.0025	<0.00060	<SDL	<SDL	<0.00060	<0.00050	<0.00050	<SDL	<0.00050	<0.00060	<0.00050	<SDL	<0.00050	<SDL	<0.00050	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00050	<0.00050	0.0014 J	<SDL	<0.00060	<SDL	<0.00050	0.329	<0.0300	NA
	10/19/10	<SDL	<0.00200	0.000267 J	<0.0000700	<0.000110	<0.000130	<0.000120	<0.000160	<SDL	<0.000130	<0.000420	0.00394	<SDL	<0.0000800	<SDL	<0.000120	<0.100	NA	NA
	07/20/11	<SDL	<0.000990	0.000168 J	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.00226	<SDL	<0.000130	<SDL	<0.000120	0.860	NA	NA
	10/28/11	<SDL	<0.000990	0.000161 J	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.00162	<SDL	<0.000130	<SDL	<0.000120	<0.100	NA	NA
	03/20/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	0.660	<0.105	NA
MW-11	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	<0.000130	<0.000120	<0.000160	<SDL	<0.000130	<0.000420	0.000442 J	<SDL	<0.0000800	<SDL	<0.000120	**33.9**	NA	NA
	07/20/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.000852 J	<SDL	<0.000130	<SDL	<0.000120	**34.5**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	0.000212 J	<0.000150	0.000290 J	<SDL	<0.000130	<SDL	<0.000120	**31.0**	NA	NA
	03/19/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	0.000303 J	<SDL	<0.000130	<SDL	<0.000120	**28.7**	**7.0**	NA
MW-12	10/19/10	<SDL	<0.00200	0.000160 J	<0.0000700	<0.000110	**0.0371**	0.0345	0.00125	<SDL	**0.00812**	**0.00924**	0.000268 J	<SDL	<0.0000800	<SDL	<0.000120	**28.2**	NA	NA
	07/21/11	<SDL	<0.000990	0.0000954 J	0.000267 J	0.000144 J	**0.0234**	0.0231	0.000998	<SDL	**0.00512**	**0.00619**	0.000672 J	<SDL	<0.000130	<SDL	<0.000120	**28.6**	NA	NA
	10/28/11	<SDL	<0.000990	0.0000821 J	<0.000240	0.000120 J	**0.0249**	0.0262	0.00102	<SDL	0.00497	**0.00614**	0.000131 J	<SDL	<0.000130	<SDL	<0.000120	**28.7**	NA	NA
	03/20/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	**0.0173**	0.0158	0.000644 J	<SDL	0.00412	**0.00522**	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**24.9**	<0.525	NA
MW-13	03/20/13	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	<0.000150	<0.000130	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	0.5	<0.105	NA
OW-1	05/19/95	<SDL	<0.050	<0.005	<SDL	<SDL	**0.006**	<0.005	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	03/20/96	<SDL	<0.050	<0.005	<SDL	<SDL	**0.076**	0.029	<0.005	<SDL	<0.005	<0.010	NA	<SDL	<0.005	<SDL	<0.005	NA	NA	NA
	01/10/02	<SDL	<0.100	<0.005	<SDL	<SDL	<0.005	<0.005	<0.005	<SDL	<0.005	<0.005	NA	<SDL	<0.005	<SDL	<0.005	5	NA	7.4
	03/11/08	<SDL	<0.010	<0.0050	<SDL	<SDL	<0.005	<0.0050	<0.0050	<SDL	<0.0050	<0.010	<0.0050	<SDL	<0.0050	<SDL	NA	NA	NA	NA
	01/21/10	<SDL	<0.0010	<0.00050	<SDL	<SDL	0.00058 J	0.0013 J	<0.00050	<SDL	<0.00050	<0.00050	<0.00050	<SDL	<0.00060	<SDL	< 0.00050	**12.9**	0.451	NA
	10/19/10	<SDL	<0.00200	<0.000130	<0.0000700	<0.000110	0.00471	0.0131	<0.000160	<SDL	<0.000130	<0.000420	<0.000150	<SDL	<0.0000800	0.000166 J	<0.000120	5.20	NA	NA
	07/21/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	**0.00571**	0.0252	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**13.3**	NA	NA
	10/28/11	<SDL	<0.000990	<0.0000800	<0.000240	<0.000120	0.00354 J	0.0223	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**12.4**	NA	NA
	03/20/13	<SDL	<0.000990	<0.0000800	<0.0000240	<0.000120	0.000876 J	0.0096	<0.000110	<SDL	<0.000140	<0.000150	<0.000120	<SDL	<0.000130	<SDL	<0.000120	**12.3**	0.764	NA
OW-2	03/20/96	<SDL	<0.050	**0.011**	<SDL	<SDL	**2.500**	**0.61**	<0.005	<SDL	**0.026**	<0.010	NA	<SDL	<0.005	<SDL	0.015	NA	NA	NA
	03/13/08	<SDL	<0.010	0.0035 J	<SDL	<SDL	**0.23**	**0.28**	0.0025 J	<SDL	**0.0088**	**0.011**	<0.0050	<SDL	0.00078 J	<SDL	NA	NA	NA	NA
	01/21/10	<SDL	<0.0010	0.00082 J	<SDL	<SDL	**0.18**	**0.25**	0.0019 J	<SDL	**0.0053**	**0.0084 J**	<0.00050	<SDL	0.00061 J	<SDL	<0.00050	**44.1**	<0.0300	NA
	10/19/10	<SDL	<0.00200	0.000621 J	0.00107	0.000241 J	**0.176**	**0.318**	0.00232	<SDL	**0.00559**	**0.00712**	<0.000150	<SDL	0.000637 J	<SDL	<0.000120	**28.3**	NA	NA
	07/21/11	<SDL	<0.000990	0.000382 J	0.00114	0.000265 J	**0.101**	0.186	0.00242	<SDL	0.00407	**0.00696**	<0.000120	<SDL	0.000702 J	<SDL	<0.000120	**29.5**	NA	NA
	10/28/11	<SDL	<0.000990	0.000358 J	0.000318 J	0.000244 J	**0.132**	0.219	0.00255	0.000232 J	0.00435	**0.00636**	<0.000120	<SDL	0.000604 J	<SDL	<0.000120	**27.3**	NA	NA
	03/20/13	<SDL	<0.000990	0.000289 J	<0.000240	0.000244 J	**0.0734**	0.145	0.00165	0.000212 J	0.00355	**0.00286**	<0.000120	<SDL	0.000603 J	<SDL	<0.000120	**22.5**	<0.525	NA

Notes: Only those volatile organic compounds detected in at least one of the samples are included on the table.
Concentrations presented in **boldface** exceed the TRRP Assessment Level
TRRP Assessment Level is the Tier 1 PCL for a residential site
TRRP Tier 1 Critical PCL is the Tier 1 PCL for a commerical/industrial site

< - less than the sample detection limit
PCL - Protective Concentration Level
J - estimated value between the method quantitative limit and the sample detection limit
TRRP - Texas Risk Reduction Program

Project No: 92137736

TABLE G-2

SUMMARY OF SURFACE WATER ANALYTICAL RESULTS

Central Industrial Park
600-720 West 6th Street
Houston, Texas

Concentrations are in milligrams per liter

Sample Number	Date	Acetone	Chloroform	Bromodichloromethane	Nitrate	Nitrite
SW-1	03/20/13	0.0106	0.00618	0.00143	5.96	0.640
SW-2	03/20/13	0.00917	0.00587	0.00139	5.49	0.71
SW-3	03/20/13	0.0122	0.00561	0.00141	5.41	0.59
SW-4	03/20/13	0.0125	0.00519	0.00125	5.97	0.79
TRRP Assessment Level		**22**	**0.24**	**0.015**	**10**	**1**

Notes: Only those volatile organic compounds detected in at least one of the samples are included on the table.
Concentrations presented in **bold** exceed the TRRP Assessment Level
TRRP Assessment Level is the Tier 1 PCL for a residential site

PCL - Protective Concentration Level
TRRP - Texas Risk Reduction Program