

San Jacinto River Waste Pits Superfund Site

Comments
of
International Paper Company
and
McGinnes Industrial Maintenance Corporation
on
Environmental Protection Agency Region 6
Proposed Remedial Action Plan

Appendix F

Documents Related to Region 6's
Request to Respondents for Additional Data Collection
and Not Included by Region 6
in the Administrative Record

January 12, 2017

Appendix F¹

Documents Related to Region 6's Request to Respondents for Additional Data Collection Not Included by Region 6 in the Administrative Record

DOC NO	DOC DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
F-1	8/6/2015	1	[SAN JACINTO RIVER WASTE PITS SAMPLING WITH SJRWP SAMPLING APPROACH ATTACHED]	Keith, David, C (ANCHOR QEA, LLC)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-2	9/9/2015	2	[SAN JACINTO RIVER WASTE PITS SAP DELAY AND SEPTEMBER 14, 2016 MEETING]	Keith, David, C (ANCHOR QEA, LLC)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-3	10/25/2015	2	[DRAFT SEDIMENT AND POREWATER SAPS]	Dwivedula, Satya (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY); Allen, Bob (HARRIS COUNTY POLLUTION CONTROL SERVICES DEPARTMENT); Henry, Linda (PORT OF HOUSTON AUTHORITY); McMahan, Garry (PORT OF HOUSTON AUTHORITY); Oberlin, Leah (PORT OF HOUSTON AUTHORITY); Sunley, Angela (TEXAS GENERAL LAND OFFICE); Sampson, Jennifer (INTEGRAL CONSULTING, INC.)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)

¹ Documents titles are set forth in the format of the Administrative Record.

DOC NO	DOC DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
F-4	2/23/2016	2	[EPA APPROVAL SJRWP - FINAL TCRA CAP POREWATER SAP ADDENDUM 1]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-5	2/29/2016	1	[SJRWP - FINAL SEDIMENT SAP ADDENDUM 3]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-6	3/23/2016	1	[SJRWP REVISED SEDIMENT SAP ADDENDUM 3]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-7	3/24/2016	1	[SAN JACINTO RIVER WASTE PITS SURFACE WATER SAP]	Keith, David, C (ANCHOR QEA, LLC)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-8	3/24/2016	1	[RECEIPT OF SJRWP DRAFT FISH TISSUE SAP]	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-9	3/24/2016	2	[SJRWP DRAFT FISH TISSUE SAP]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-10	3/27/2016	1	[SJRWP SURFACE WATER SAP]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-11	4/29/2016	2	[SJRWP FIELD SAMPLING SCHEDULE- WEATHER]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-12	6/6/2016	2	[APPROVAL OF RESUMPTION OF SAMPLING]	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)

DOC NO	DOC DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
F-13	7/1/2016	1	[SAMPLING SCHEDULE]	Sampson, Jennifer (INTEGRAL CONSULTING, INC.); Keith, David, C (ANCHOR QEA, LLC)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-14	7/1/2016	2	[SJRWP SAMPLING SCHEDULE, JULY 4 – 23]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY); Yost, Brian (EA ENGINEERING SCIENCE AND TECHNOLOGY INCORPORATED)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-15	7/11/2016	1	[SJRWP DATA BASE UPDATE]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-16	7/12/2016	1	[RECEIPT OF SJRWP DATA BASE UPDATE]	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)
F-17	7/19/2016	4	[SAN JACINTO SEDIMENT SAMPLES WITH VALIDATED DATA ATTACHED]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-18	8/11/2016	1	[SJRWP SAMPLE ANALYSIS AND DATA VALIDATION SCHEDULE WITH SCHEDULE FOR SJRWP ANALYSIS AND REPORTING ATTACHED]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-19	9/14/2016	1	[RECEIPT OF SJRWP UPDATED AND COMPLETE DATABASE POSTED]	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)
F-20	9/26/2016	1	[RECEIPT OF SAN JACINTO RIVER WASTE PITS DATA SUMMARY REPORT]	Sampson, Jennifer (INTEGRAL CONSULTING, INC.)	Miller, Gary, G (U.S. ENVIRONMENTAL PROTECTION AGENCY)

From: [Miller, Garyg](#)
To: [David Keith](#)
Cc: [Foster, Anne](#); [Sanchez, Carlos](#); [Walters, Donn](#); [Werner, Robert](#)
Subject: San Jacinto River Waste Pits Sampling
Date: Thursday, August 06, 2015 6:02:56 AM
Attachments: [SJRWP Sampling Approach 8-6-2015.docx](#)

David,

The purpose of this email is to notify you that the Environmental Protection Agency (EPA) has determined that additional sampling is required for the Remedial Investigation and Feasibility Study (RI/FS) being conducted by Respondents under the Unilateral Administrative Order (UAO), CERCLA Docket No. 06-03-10, for the San Jacinto River Waste Pits Superfund Site (Site). In keeping with Paragraph 53 of the UAO, the purpose of the sampling is to determine the nature and extent of contamination, including whether contamination from the waste pits has spread to the surrounding areas. Additional detail on the purpose of the sampling is contained in the attached sampling approach. In accordance with Paragraphs 54 and 71 of the above referenced UAO, the EPA is directing Respondents to revise the Final RI/FS Work Plan, dated November 2010, or prepare an addendum to the Work Plan, to provide the necessary plans and schedule to accomplish the sampling described in the attached sampling approach. The revised RI/FS Work Plan or Work Plan addendum shall be submitted to EPA in accordance with the UAO within thirty calendar days of receipt of this email.

Please let me know if you have any questions on this.

Regards,

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

From: [Miller, Garyg](#)
To: [David Keith](#)
Cc: [Dave Moreira \(dmoreira@wm.com\)](#); [Phil Slowiak](#); [Jennifer Sampson](#); [Foster, Anne](#); [Teri Freitas](#); [Sanchez, Carlos](#)
Subject: RE: San Jacinto SAP Delay
Date: Wednesday, September 09, 2015 9:09:32 AM

David,

Thanks for the letter. We look forward to meeting with you on September 14, 2015, to finalize the sampling approach and the date for submission of the sampling plan.

Regards,

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

From: David Keith [mailto:dkeith@anchoragea.com]
Sent: Friday, September 04, 2015 3:41 PM
To: Miller, Garyg
Cc: Dave Moreira (dmoreira@wm.com); Phil Slowiak; Jennifer Sampson; Foster, Anne; Teri Freitas
Subject: San Jacinto SAP Delay

Gary – As we have discussed, please see the attached letter. Hard copies are also being provided by overnight delivery.

Thank you,
David

*David Keith
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39564*

*Phone: 228-220-1156
Cell: 228-224-2983
dkeith@anchoragea.com*

ANCHOR QEA, LLC
www.anchoragea.com

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This electronic message transmission contains information that may be confidential and/or privileged work product prepared in anticipation of litigation. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying distribution or use of the contents of this information is

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From: [Miller, Garyg](#)
To: [Satya Dwivedula](#); [Bob Allen](#); [Linda Henry](#); [Garry McMahan](#); [Leah Oberlin \(loberlin@poha.com\)](#); [angela.sunley@glo.texas.gov](#); [Jennifer Sampson](#)
Cc: [Sanchez, Carlos](#); [Foster, Anne](#)
Subject: FW: SJRWP - Draft Sediment and Porewater Sampling and Analysis Plans
Date: Sunday, October 25, 2015 4:22:06 PM

Folks,

The draft sampling plans for sediment & porewater at the San Jacinto site are attached. I would appreciate your review/comment on these within 30 days from Monday 10/26/15. The draft sampling plans for groundwater and surface water will be completed in the future. If you have any problems accessing the files at the link below please let me know.

Jennifer, please set up access/password for Angela Sunley (TX GLO), who is the current Trustees representative.

Thanks,

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [mailto:jsampson@integral-corp.com]
Sent: Friday, October 23, 2015 6:01 PM
To: Miller, Garyg; Miller, Garyg
Cc: Dave Moreira (dmoreira@wm.com); philip.slowiak@ipaper.com; David Keith
Subject: SJRWP - Draft Sediment and Porewater Sampling and Analysis Plans

Dear Gary-

On behalf of McGinnes Industrial Maintenance Corp. and International Paper Company, Integral and Anchor QEA have posted the following draft sampling and analysis plan (SAP) addenda for the San Jacinto River Waste Pits Superfund site for your review:

- Draft Sediment SAP Addendum 3
- Draft TCRA Cap Porewater Assessment SAP Addendum 1

The documents are posted on the project web page, in the "SJRWP-Working Documents" folder, at the following link:

<https://sjrwp-working-documents.wiki.integral-corp.com/>

Hardcopies are in preparation and will be sent early next week.

These documents are submitted pursuant to CERCLA Docket No. 06-03-10.

Thank you,

Jennifer

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: "Miller, Garyg"
Cc: [Dave Moreira \(dmoreira@wm.com\)](mailto:dmoreira@wm.com); [David Keith](#); [Phil Slowiak](#); [Sanchez, Carlos](#); [Walters, Donn](#); [Satya Dwivedula](#); [Bob Allen](#); [Linda Henry](#); [Garry McMahan](#); [Leah Oberlin \(loberlin@poha.com\)](mailto:loberlin@poha.com); angela.sunley@glo.texas.gov; [Todd, Brandi](#); [Leos, Valmichael](#)
Subject: RE: SJRWP: Final TCRA Cap Porewater SAP Addendum 1
Date: Tuesday, February 23, 2016 2:13:00 PM

Thank you,

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Miller, Garyg [<mailto:Miller.Garyg@epa.gov>]
Sent: Tuesday, February 23, 2016 1:25 PM
To: Jennifer Sampson <jsampson@integral-corp.com>
Cc: Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; David Keith <dkeith@anchorqea.com>; Phil Slowiak <philip.slowiak@ipaper.com>; Sanchez, Carlos <sanchez.carlos@epa.gov>; Walters, Donn <walters.donn@epa.gov>; Satya Dwivedula <satya.dwivedula@tceq.texas.gov>; Bob Allen <bob.allen@pcs.hctx.net>; Linda Henry <lhenry@poha.com>; Garry McMahan <gmcumahan@poha.com>; Leah Oberlin (loberlin@poha.com) <loberlin@poha.com>; angela.sunley@glo.texas.gov; Todd, Brandi <Todd.Brandi@epa.gov>; Leos, Valmichael <Leos.Valmichael@epa.gov>
Subject: RE: SJRWP: Final TCRA Cap Porewater SAP Addendum 1

Jennifer,

The EPA has reviewed and approves the attached TCRA Cap Porewater Assessment plan. As we discussed, the field work for deployment of the samplers will begin no later than April 4, 2016. Preparation and decontamination of the passive pore-water samplers will be completed prior to field mobilization. Please provide at least two weeks' notice to EPA prior to field mobilization to allow coordination with the EPA Dive Team.

We will follow-up this email with a letter. Please let me know if you have any questions on this.

Regards,

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]

Sent: Friday, February 12, 2016 5:19 PM

To: Miller, Garyg; Miller, Garyg

Cc: Dave Moreira (dmoreira@wm.com); David Keith; Phil Slowiak

Subject: SJRWP: Final TCRA Cap Porewater SAP Addendum 1

Gary-

On behalf of International Paper Company and McGinnes Industrial Maintenance Corp, Integral and Anchor QEA have posted the revised *TCRA Cap Porewater Assessment Sampling and Analysis Plan, Addendum 1*, for the San Jacinto River Waste Pits on the Final Documents directory at the project web page. You can access the file here:

<https://sjrwp-final-documents.wiki.integral-corp.com/>

Hardcopies will be shipped to you on Tuesday.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Thank you,

Jennifer Sampson | Senior Managing Scientist

Integral Consulting Inc. | www.integral-corp.com

719 2nd Avenue, Suite 700 | Seattle, WA 98104

Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov) (miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:Gary.Miller (miller.garyg@epamail.epa.gov))
Cc: [Dave Moreira \(dmoreira@wm.com\)](mailto:dmoreira@wm.com); "philip.slowiak@ipaper.com"; [David Keith](#)
Subject: SJRWP - Final Sediment SAP Addendum 3
Date: Monday, February 29, 2016 11:56:00 AM

Dear Gary-

On behalf of International Paper Company and McGinnes Industrial Maintenance Corp, Integral and Anchor QEA have posted the revised *Sampling and Analysis Plan, Sediment Study, Addendum 3*, for the San Jacinto River Waste Pits on the Final Documents directory at the project web page. You can access the file here:

https://sjrwp-final-documents.wiki.integral-corp.com/RI_FS+Documents

Hardcopies will be shipped to you on Tuesday.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Thank you,

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov) (miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:Gary.Miller (miller.garyg@epamail.epa.gov))
Cc: "[Philip J Slowiak](#)"; [Dave Moreira \(dmoreira@wm.com\)](mailto:dmoreira@wm.com); [David Keith](#)
Subject: SJRWP Revised Sediment SAP Addendum 3
Date: Wednesday, March 23, 2016 3:48:00 PM

Gary,

Per your March 16 email to David Keith requiring revisions to the subject document, Integral has posted the revised document to the project wiki, on behalf of McGinnes Industrial Maintenance Corp and International Paper Company. The revised document can be accessed here:

<https://sjrwp-final-documents.wiki.integral-corp.com/>

Hardcopies of replacement text (only) will be sent to you today.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: [Miller, Garyg](#)
To: [David Keith](#)
Cc: [Jennifer Sampson](#); [Sanchez, Carlos](#); [Foster, Anne](#); [Walters, Donn](#); [Satya Dwivedula](#); [Bob Allen](#); [Linda Henry](#); [Garry McMahan](#); [Leah Oberlin \(loberlin@poha.com\)](#); [angela.sunley@glo.texas.gov](#); [Delgado, Stephanie](#)
Subject: San Jacinto River Waste Pits Surface Water Sampling Plan
Date: Thursday, March 24, 2016 4:20:10 AM
Attachments: [SJRWP Surface Water SAP 17Mar2016.pdf](#)

David,

The U.S. Environmental Protection Agency (EPA) has completed its review and approves the above referenced surface water sampling and analysis plan dated March 17, 2016, with the following modification:

1. Flow and tidal conditions during sampling may impact the results. As a result, all samples shall be collected during a falling or outgoing tide.

As we discussed, the field work for surface water sample collection will begin no later than the week of April 18, 2016. We will followup-up this email with a letter. Please let me know if you have any questions on this.

Regards,

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#)
Cc: [David Keith](#)
Subject: RE: SJRWP Draft Fish Tissue SAP
Date: Thursday, March 24, 2016 1:11:20 PM

Got it – thanks Jennifer

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [mailto:jsampson@integral-corp.com]
Sent: Thursday, March 24, 2016 3:01 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; David Keith <dkeith@anchorqa.com>; Phil Slowiak <philip.slowiak@ipaper.com>
Subject: SJRWP Draft Fish Tissue SAP

Gary,
On behalf of McGinnes Industrial Maintenance Corp and International Paper Company, Integral has posted the *Draft Tissue Sampling and Analysis Plan, Addendum 2, San Jacinto River Waste Pits Superfund Site* to the project wiki. The document can be accessed here:

<https://sjrwp-working-documents.wiki.integral-corp.com/home>

Hardcopies are being printed and will be shipped to you tomorrow.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: ["Miller, Garyg"](#)
Cc: [David Keith](#)
Subject: RE: SJRWP Draft Fish Tissue SAP
Date: Thursday, March 24, 2016 1:12:00 PM

OK, did you also get the revised sediment SAP addendum? We posted that yesterday to the Final Documents folder.

Thank you,

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Miller, Garyg [mailto:Miller.Garyg@epa.gov]
Sent: Thursday, March 24, 2016 1:11 PM
To: Jennifer Sampson <jsampson@integral-corp.com>
Cc: David Keith <dkeith@anchoragea.com>
Subject: RE: SJRWP Draft Fish Tissue SAP

Got it – thanks Jennifer

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [mailto:jsampson@integral-corp.com]
Sent: Thursday, March 24, 2016 3:01 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; David Keith <dkeith@anchoragea.com>; Phil Slowiak <philip.slowiak@ipaper.com>
Subject: SJRWP Draft Fish Tissue SAP

Gary,
On behalf of McGinnes Industrial Maintenance Corp and International Paper Company, Integral has posted the *Draft Tissue Sampling and Analysis Plan, Addendum 2, San Jacinto River Waste Pits Superfund Site* to the project wiki. The document can be accessed here:

<https://sjrwp-working-documents.wiki.integral-corp.com/home>

Hardcopies are being printed and will be shipped to you tomorrow.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov) (miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:Gary.Miller (miller.garyg@epamail.epa.gov))
Cc: [Dave Moreira \(dmoreira@wm.com\)](mailto:Dave.Moreira (dmoreira@wm.com)); [Phil Slowiak](#); [David Keith](#)
Subject: SJRWP Surface Water SAP
Date: Thursday, March 17, 2016 2:34:00 PM

Gary-

On behalf of International Paper Company and McGinnes Industrial Maintenance Corp, Integral and Anchor QEA have posted the revised *Sampling and Analysis Plan: Surface Water Study*, for the San Jacinto River Waste Pits Superfund Site on the Final Documents directory at the project web page. You can access the file here:

<https://sjrwp-final-documents.wiki.integral-corp.com/>

Hardcopies will be shipped to you tomorrow.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: ["Miller, Garyg"](#)
Cc: [David Keith](#); [Dave Moreira \(dmoreira@wm.com\)](#); [Philip J Slowiak](#); [Sanchez, Carlos](#); [Walters, Donn](#); [Foster, Anne](#)
Subject: RE: SJRWP Field Sampling Schedule
Date: Friday, April 29, 2016 3:53:00 PM

Will do.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Miller, Garyg [mailto:Miller.Garyg@epa.gov]
Sent: Friday, April 29, 2016 3:39 PM
To: Jennifer Sampson <jsampson@integral-corp.com>
Cc: David Keith <dkeith@anchorqea.com>; Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; Philip J Slowiak <Philip.Slowiak@ipaper.com>; Sanchez, Carlos <sanchez.carlos@epa.gov>; Walters, Donn <walters.donn@epa.gov>; Foster, Anne <Foster.Anne@epa.gov>
Subject: RE: SJRWP Field Sampling Schedule

Jennifer,

Please stand by until Monday so we can see what impact the rain forecast for this weekend has; if it's not too severe at least part of the sampling could be accomplished next week.

Regards,

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Miller, Garyg
Sent: Friday, April 29, 2016 4:50 PM
To: 'Jennifer Sampson' <jsampson@integral-corp.com>
Cc: David Keith <dkeith@anchorqea.com>; Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; Philip J Slowiak <Philip.Slowiak@ipaper.com>; Sanchez, Carlos <sanchez.carlos@epa.gov>; Walters, Donn <walters.donn@epa.gov>; Foster, Anne <foster.anne@epa.gov>
Subject: RE: SJRWP Field Sampling Schedule

Got it, thanks Jennifer; will get back to you on this.

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]
Sent: Friday, April 29, 2016 4:24 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: David Keith <dkeith@anchoragea.com>; Dave Moreira (dmoreira@wm.com)
<dmoreira@wm.com>; Philip J Slowiak <Philip.Slowiak@ipaper.com>
Subject: SJRWP Field Sampling Schedule

Hi Gary-

Integral has been tracking weather in Houston this week to see if water sampling can be re-started on May 2 or 3. Right now the San Jacinto is at 2,000 cfs or so, but storms are predicted for this weekend. Because the Surface Water SAP stipulates that water sampling should not occur at flows above 2,000 cfs, the team is currently not planning to deploy again on Monday, but waiting out the current weather forecast.

The long term forecast for May indicates continued higher than average probability of precipitation in Texas.

<http://www.cpc.ncep.noaa.gov/products/predictions/30day/>

At this point, we think it would be best to postpone the entire field effort until June. This decision does not affect the overall project schedule because the porewater sampling sets the pace of reporting.

Please let us know if you object. If not, we'll plan to start the field work for water, tissue and sediment the week of June 6.

Thank you,

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#)
Cc: [David Keith](#); [Philip J Slowiak](#); [Dave Moreira \(dmoreira@wm.com\)](#); [Sanchez, Carlos](#); [Meyer, John](#); [Walters, Donn](#); [Foster, Anne](#); [Satya Dwivedula](#); [Bob Allen](#); [Linda Henry](#); [Garry McMahan](#); [Leah Oberlin \(loberlin@poha.com\)](#); [angela.sunley@glo.texas.gov](#); [Walker, Tina \(DSHS\)](#)
Subject: RE: SJRWP: Request to change sampling schedule
Date: Monday, June 06, 2016 8:28:40 AM

Jennifer,

The EPA approves the plan below to resume surface water, fish, and sediment sampling on July 5, 2016, conditions permitting.

Regards,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]
Sent: Monday, June 06, 2016 10:12 AM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: David Keith <dkeith@anchorqea.com>; Philip J Slowiak <Philip.Slowiak@ipaper.com>; Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>
Subject: SJRWP: Request to change sampling schedule

Hi Gary-

Due to unstable weather in Houston during April and May, Integral was unable to complete the surface water sampling on behalf of Respondents according to the schedule anticipated in the SAP. Because of continued high probability of unusually rainy weather through the month of June, and the stipulation in the SAP that sampling is to be conducted when the river is at 2,000 cfs or below, this email is to request your approval to postpone the surface water sampling schedule, with a target start date of July 5. With your approval, we will also plan to complete the sampling for Gulf killifish and for sediments at that time.

Please respond with your approval, or any required adjustments to the proposed timing above.

Thanks very much for your consideration.

CERCLA Docket 06-03-10.

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719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#); [David Keith](#)
Subject: RE: San Jacinto
Date: Friday, July 01, 2016 4:49:19 AM

OK, thanks.

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]
Sent: Thursday, June 30, 2016 6:07 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; David Keith <dkeith@anchoragea.com>
Subject: RE: San Jacinto

Hi Gary-

We are sending folks out on Sunday and they will be on the water Tuesday. I will have a detailed schedule for you tomorrow.

Thank you,

Jennifer Sampson | Senior Managing Scientist
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Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Miller, Garyg [<mailto:Miller.Garyg@epa.gov>]
Sent: Thursday, June 30, 2016 2:49 PM
To: David Keith <dkeith@anchoragea.com>; Jennifer Sampson <jsampson@integral-corp.com>
Subject: San Jacinto

Date in mind for starting/finishing the surface water et al sampling?

Thanks,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:miller.garyg@epamail.epa.gov); "Yost, Brian"
Cc: [David Keith; Dave Moreira \(dmoreira@wm.com\)](mailto:dmoreira@wm.com); "Philip J Slowiak"; istupakoff@integral-corp.com
Subject: SJRWP Sampling Schedule, July 4 - 23, 2016
Date: Friday, July 01, 2016 8:53:00 AM

Hi Gary and Brian –

Below is a detailed schedule of activities for the surface water and remaining tissue and sediment sampling needed to complete the 2016 studies for the San Jacinto River Waste Pits RI.

Ian Stupakoff is our field lead for this work. Brian and other EPA oversight can coordinate directly with him. His cell number is 360-259-2518.

Please let me or Ian know if you have any questions.

Thank you,

Jennifer Sampson | Senior Managing Scientist
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 719 2nd Avenue, Suite 700 | Seattle, WA 98104
 Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

	Sun	Mon	Tue	Wed	Thur	Fri	Sat
July 1	Integral travel	4 Integral mobilization	5 SW sampling at SJSW001 and SJSW002 11:00 AM - 7:00 PM	6 SW sampling at SJSW004 and SJSW007 12:00 PM - 7:00 PM	7 SW sampling at SJSW005 and SJSW006 10:00 AM - 7:00 PM Boyer boat	8 SW sampling at SJSW003 with Duplicate sample 12:00 PM - 7:00 PM	9 Integral/Benchmark break
July 10	Integral/Benchmark break	11 Integral/Benchmark mobilization	12 SW sampling at SJSW001 and SJSW002 12:00 PM - 7:00 PM	13 SW sampling at SJSW004 and SJSW007 12:00 PM - 7:00 PM	14 SW sampling at SJSW005 and SJSW006 10:00 AM - 7:00 PM Boyer boat	15 SW sampling at SJSW003 with Duplicate sample 12:00 PM - 7:00 PM	16 Deploy fish traps at SJTTR2 and SJTTR3 at 8:00 AM; Sediment sampling 10:00 AM - 4:00 PM

July	17	18	19	20	21	22	23
	Recover and redeploy fish traps at SJTTR2 and SJTTR3 at 8:00 AM BCKP electroshock 10:00 AM - 2:00 PM	Recover fish traps at SJTTR2 and SJTTR3 at 8:00 AM; BCKP electroshock 10:00 AM - 2:00 PM	SW sampling at SJSW001 and SJSW002 10:00 AM - 6:00 PM	SW sampling at SJSW004 and SJSW007 10:30 AM - 6:30 PM	Integral SW sampling at SJSW005 and SJSW006 10:00 AM - 7:00 PM Boyer boat	SW sampling at SJSW003 with Duplicate sample 11:00 AM - 5:00 PM	Integral demobilization

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov) (miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:Gary.Miller (miller.garyg@epamail.epa.gov))
Cc: [David Keith](#); [Dave Moreira \(dmoreira@wm.com\)](mailto:dmoreira@wm.com); [Phil Slowiak](#)
Subject: SJRWP Data base update
Date: Monday, July 11, 2016 4:52:00 PM

Hi Gary-

The project database has been updated with the recent data for sediments at the San Jacinto River Waste Pits site. The updated database can be accessed at the wiki, here:

<https://sjrwp-epa-tceq.wiki.integral-corp.com/Database>

Please let me know if you have any questions.

Thank you,

Jennifer Sampson | Senior Managing Scientist
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Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH **ENVIRONMENT** **TECHNOLOGY** **SUSTAINABILITY**

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#)
Subject: RE: SJRWP Data base update
Date: Tuesday, July 12, 2016 4:41:58 AM

OK, thanks Jennifer

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [mailto:jsampson@integral-corp.com]
Sent: Monday, July 11, 2016 6:53 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: David Keith <dkeith@anchorqea.com>; Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>; Phil Slowiak <philip.slowiak@ipaper.com>
Subject: SJRWP Data base update

Hi Gary-

The project database has been updated with the recent data for sediments at the San Jacinto River Waste Pits site. The updated database can be accessed at the wiki, here:

<https://sjrwp-epa-tceq.wiki.integral-corp.com/Database>

Please let me know if you have any questions.

Thank you,

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Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Jennifer Sampson
To: ["Miller, Gary"](#)
Cc: [David Keith](#); [Dave Moreira \(dmoreira@wm.com\)](#); [Philip J Slowiak](#)
Subject: RE: San Jacinto Sediment Samples
Date: Tuesday, July 19, 2016 11:22:00 AM
Attachments: [SJRWP_RI_Sediment_EPA_Splits_2016_07-19-2016.xlsx](#)

Hi Gary-

Here is a spreadsheet with the validated data for the 2016 sediment samples listed below. Please note that our database automatically calculates non-detects at ½ DL before exporting to Excel, so the value shown for *U*-qualified results is ½ the Detection Limit for that analyte in that sample.

Please send results from your analysis of these samples when you get a chance.

Thank you,

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Miller, Gary [<mailto:Miller.Garyg@epa.gov>]
Sent: Tuesday, July 19, 2016 9:29 AM
To: Jennifer Sampson <jsampson@integral-corp.com>
Subject: RE: San Jacinto Sediment Samples

Jennifer,

Here are the split sample numbers:

SJNE072
SJNE073
SJNE074

Thanks,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]
Sent: Tuesday, July 19, 2016 10:06 AM
To: Miller, Gary <Miller.Garyg@epa.gov>
Cc: Phil Slowiak <philip.slowiak@paper.com>; Dave Moreira (dmoreira@wm.com)

<dmoreira@wm.com>; David Keith <dkeith@anchoragea.com>

Subject: RE: San Jacinto Sediment Samples

Hi Gary-

I'll give you a call to check in, but for the benefit of everyone else on this email, sediment splits were collected in May. Brian Yost was on site as EPA's oversight consultant, and he brought jars, presumably from EPA's selected laboratory. The sediments from locations designated for splits were each homogenized, and Brian's/EPA's jars were filled at the same time as the jars for Respondents' team. Brian then took custody of EPA's samples.

Integral posted the updated database, with data for all of those sediment samples in it, to the portal last Monday. The attached email may remind you of that notice.

I'll call you shortly.

Jennifer Sampson | Senior Managing Scientist
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719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: David Keith [<mailto:dkeith@anchoragea.com>]

Sent: Tuesday, July 19, 2016 7:21 AM

To: Gary Miller (miller.garyg@epa.gov) <miller.garyg@epa.gov>; Jennifer Sampson <jsampson@integral-corp.com>

Cc: Phil Slowiak <philip.slowiak@ipaper.com>; Dave Moreira (dmoreira@wm.com) <dmoreira@wm.com>

Subject: FW: San Jacinto Sediment Samples

Jennifer – Please see the email below from Gary and respond as appropriate. I'm traveling most of today, but will pick up messages on my layover around mid-day.

Thanks,
David

From: Miller, Garyg [<mailto:Miller.Garyg@epa.gov>]

Sent: Tuesday, July 19, 2016 8:01 AM

To: David Keith <dkeith@anchoragea.com>

Cc: Yost, Brian <byost@eaest.com>

Subject: FW: San Jacinto Sediment Samples

David – data available on the split sediment samples?

Thanks,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Yost, Brian [<mailto:byost@eaest.com>]
Sent: Monday, July 18, 2016 10:44 AM
To: Miller, Garyg <Miller.Garyg@epa.gov>
Subject: FW: San Jacinto Sediment Samples

Hi Gary, Have you received the split samples from Anchor per the below?

Thanks,

*Brian Yost, CHMM
Project Manager/Sr. Scientist
EA Engineering, Science, and Technology, Inc., PBC
Dallas, TX
972-315-3922*

From: David Keith [<mailto:dkeith@anchorgea.com>]
Sent: Thursday, June 23, 2016 1:37 PM
To: Miller, Garyg
Cc: Yost, Brian
Subject: RE: San Jacinto Sediment Samples

Let me check. I'll get back to you.

From: Miller, Garyg [<mailto:Miller.Garyg@epa.gov>]
Sent: Thursday, June 23, 2016 10:28 AM
To: David Keith <dkeith@anchorgea.com>
Cc: Yost, Brian <byost@eaest.com>
Subject: San Jacinto Sediment Samples

David,

What is the status for the sediment sampling results?

Thanks,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson
To: [Gary Miller \(miller.garyg@epa.gov\)](mailto:miller.garyg@epa.gov) (miller.garyg@epa.gov); [Gary Miller \(miller.garyg@epamail.epa.gov\)](mailto:Gary.Miller (miller.garyg@epamail.epa.gov))
Cc: [Dave Moreira \(dmoreira@wm.com\)](mailto:Dave.Moreira (dmoreira@wm.com)); "Philip J Slowiak"; [David Keith](#)
Subject: SJRWP Sample analysis and data validation schedule
Date: Thursday, August 11, 2016 9:39:00 AM
Attachments: [SJRWP Schedule for Analysis and Reporting 11_Aug_2016.pdf](#)

Hi Gary-

Per our conversation last week, please find attached a copy of the current analysis and validation schedule for samples from the SJRWP.

Please let me know if you have questions.

Jennifer Sampson | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
719 2nd Avenue, Suite 700 | Seattle, WA 98104
Tel: 206.957.0351 | Cell: 360.286.7552 | Fax: 206.230.9601

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#)
Subject: RE: SJRWP updated and complete database posted
Date: Wednesday, September 14, 2016 6:31:35 AM

Thanks Jennifer

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

-----Original Message-----

From: Jennifer Sampson [<mailto:jsampson@integral-corp.com>]
Sent: Wednesday, September 14, 2016 8:30 AM
To: Miller, Garyg <https://urldefense.proofpoint.com/v2/url?u=http-3A__Miller.Garyg-40epa.gov&d=DQIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=U-gTEgcvw_VDAIbAA0JkxqtMxGUtoVtrmpLWzQtBgY&m=bTywxOx88AJiqlqX9UrxaculuzrTY3REvXpmSTIEjzo&s=1hY40HrhURCM0sPdJpglfO1PghvyILXamGnQdxdbINI&e=>>; Miller, Garyg <https://urldefense.proofpoint.com/v2/url?u=http-3A__Miller.Garyg-40epa.gov&d=DQIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=U-gTEgcvw_VDAIbAA0JkxqtMxGUtoVtrmpLWzQtBgY&m=bTywxOx88AJiqlqX9UrxaculuzrTY3REvXpmSTIEjzo&s=1hY40HrhURCM0sPdJpglfO1PghvyILXamGnQdxdbINI&e=>>
Cc: Dave Moreira <dmoreira@wm.com>; Philip Slowiak <https://urldefense.proofpoint.com/v2/url?u=http-3A__Philip.Slowiak-40ipaper.com&d=DQIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=U-gTEgcvw_VDAIbAA0JkxqtMxGUtoVtrmpLWzQtBgY&m=bTywxOx88AJiqlqX9UrxaculuzrTY3REvXpmSTIEjzo&s=u4azamLk3-T8rqwexXUKUvRhwhfKvY-GGJ2f29P434wc&e=>>; David Keith <dkeith@anchorqa.com>
Subject: SJRWP updated and complete database posted

Hi Gary,
The project database has been updated with all validated results of 2016 studies and posted to the project web page, in the "EPA-TCEQ-Trustees" folder.

CERCLA Docket No. 06-03-10.

Thank you,
Jennifer Sampson

Sent from my iPhone

From: [Miller, Garyg](#)
To: [Jennifer Sampson](#)
Subject: RE: San Jacinto River Waste Pits Data Summary Report
Date: Monday, September 26, 2016 12:24:59 PM

Got it, thanks

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

From: Jennifer Sampson [mailto:jsampson@integral-corp.com]
Sent: Friday, September 23, 2016 4:30 PM
To: Miller, Garyg <Miller.Garyg@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>
Cc: philip.slowiak@ipaper.com; David Keith <dkeith@anchorqea.com>; Dave Moreira
(dmoreira@wm.com) <dmoreira@wm.com>
Subject: San Jacinto River Waste Pits Data Summary Report

Gary-
On behalf of International Paper Company and McGinnes Industrial Maintenance Corp., Integral and Anchor QEA have posted a *Data Summary Report: 2016 Studies* to the wiki at the following location:

https://sjrwp-final-documents.wiki.integral-corp.com/RI_FS+Documents

I sent this email about 30 minutes ago with the report attached, but it may have been too big for your email system. Harcopies are in the mail.

This document is submitted pursuant to CERCLA Docket No. 06-03-10.

Thank you,

Jennifer Sampson | Senior Managing Scientist
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HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY