

SUMMARY OF DOCUMENTS RECEIVED FROM TCEQ OPEN RECORDS REQUEST

What follows is a summary of documents received in early October 2017 from the Texas Commission on Environmental Quality (TCEQ) concerning the 2300 Plano Pkwy, Plano (Dell) property insofar as it has been a regulated entity (RE) with the TCEQ. These documents from a public information request for any and all documents in the TCEQ records for voluntary cleanup program (VCP) #2480. The documents are a collection of correspondence between property owner(s) to TCEQ, and interoffice memoranda of the TCEQ. I have omitted some documents that had no new information. The summary is an excerpt of pdf documents and is in order of oldest date to most recent date. My personal comments are in red italic font. Certain of these documents have been posted in full and the listing and links can be found at the end of this document
By Henry Guttormson.

Acronyms:

APAR: affected property assessment report
AST: above ground storage tank
bls: below land surface
COC: chemicals of concern
CN XXX: TCEQ customer reference number
ESA: environmental site assessment
GBT: George Bush Turnpike
GWBU: groundwater bearing unit
GWMW: groundwater monitoring well
IDW: investigation derived waste
LORP: level of required performance
LPST: leaking petroleum storage tank
MSD: municipal setting designation
MW: monitoring well
NOR: notice of registration
PCL: protective concentration levels
PST: petroleum storage tank
RE: TCEQ regulated entity
RN XXX: TCEQ regulated entity reference number
sb: soil boring
TCEQ: Texas Commission on Environmental Quality
TRRP: Texas Risk Reduction Program
UST: under ground storage tank
VCP: voluntary cleanup program
WMU: waste management units

Companies involved:

ARCO: property owner in 1960s, 1970s, and 1980s; purchased farm land and created research facility with ASTs, USTs, transformers, and labs with underground drain holding tanks.

Perot Systems: purchased real property from ARCO in 2000 and used as office starting in 2001. *(Probably added a couple of diesel ASTs for back up generators)*

Dell: purchased real property from Perot Systems in 2009 and used property as office. Dell subsequently purchased PSC LP as a subsidiary.

PSC LP: Dell leaves property in 2012 and PSC moves office onto property.

NTT Data: PSC moves off property and leases to NTT Data as office.

Zephyr: Environmental services company. Zephyr is contracted by PSC LP in 2012 as the company to execute the VCP #2480.

History – SUMMARY of Correspondence.

<u>Date</u>	<u>Documents</u>
1990	ARCO memo concerning groundwater testing on “caliche pad” near hazardous waste shed (Bldg S)
1990	June and July 1990 testing reports of labs by NDRC Labs company
1990	June and July 1990 groundwater monitoring well testing (3 wells; MW-1, MW-2, MW-3) report by Harding Lawson Associates (HLA) company to determine groundwater gradient and hazardous chemicals
1999	Dec 17, 1999 Report-Phase I Environmental Site Assessment by Carter Burgess company for Perot Systems on ARCO property prior to purchase of property for potential liability issues
2000	Radiation(tritium) removal and termination of radiation license <i>(ARCO used tritium in some of their lab equipment)</i>
2004	Report by Carter-Burgess company about drinking water testing and asbestos abatement in Bldg E labs E1102, E1817, E1821, and E1825. <i>(drinking water tested OK. Pipes in the labs that tested positive for mercury were removed)</i>
2004	Sept 23 2004 document: asbestos abatement checklist (post cleanup)
2004	Hazardous chemical testing reports for labs
2004	Sept 2004 document: asbestos removal report <i>(ARCO had pipe insulation and flooring material in their labs that contained asbestos)</i>

- 2009 Perot Systems work order for transformer annual oil sampling (*large power transformers use hazardous chemicals for cooling the transformers*)
- 2009 Database query of PST locations and status
- 2009 Environmental Data Resources (EDR) company records search
 -Geologic and wells survey
 -Govt records search
 -List of chemicals stored or transported in 1996, 2006, 2009
 -List of VCP sites within ½ mile of target property (*Parkwood Square Shopping Center, 300 Custer Rd; probably a old dry cleaner business*)
 -Perot Systems work order for transformer annual oil sampling
 -Database query of PST locations and status
- 2009 Dec 22, 2009 Report-Phase I Environmental Site Assessment by ERM company for Dell prior to purchase of property for potential liability issues
- 2012 Feb 14, 2012 Report-VCP Environmental Assessment of PSC Plano Campus by Zephyr company for PSC LP (*initial VCP ESA*)
- 2012 Feb 21, 2012-Drinking water survey report by Zephyr company for PSC
- 2012 Feb 2012 document: VCP agreement document
- 2012 April 2012 progress report-VCP application approved. Draft work plan in work to conduct assessment.
- 2012 May 2012 Work Plan-VCP work plan for VCP site #2480 by Zephyr company for PSC LP
 -Document indicating that the demolition of a UST by ARCO was not documented and transferred to PSC LP. (*1,000 gal. diesel tank removed by ARCO on Jan 1, 1989*).
- 2012 July 3 2012 letter from TCEQ to PSC concerning previous Phase I ESAs, VCP Environmental Assessment, and May 11, 2012 work plan. Also, direction to address all possible sources of release and additional groundwater samples will be necessary for the scheduled APAR due Jan 2013.
- 2012 July 2012 monthly status report by Zephyr-May work plan approved. (*this is work plan #1*)
- 2012 August 2012 monthly status report by Zephyr-Well sampling performed and continues.
- 2012 Nov 5, 2012 Report-PST Program Release Determination Report Form; report by Zephyr company to TCEQ that chemical spill occurred in the past (prior to 2000) based on soil sampling.
- 2012 November 2012 monthly status report by Zephyr-groundwater and soil samples collected during August, Sept, Oct 2012 confirm presence of COCs exceeding PCLs.

Vertical and horizontal extent has yet to be determined. Further assessment activities are required.

- 2012 Dec 14, 2012 TCEQ interoffice memo of meeting of findings in last half of 2012.
- 2012 December monthly status report by Zephyr-Summary of findings to date for the Affected Property Assessment. Additional assessment activities to begin in Jan 2013 and request extend the APAR delivery date to July 11, 2013. *(results of work plan #1)*
- 2013 Jan-May 2013 monthly status reports by Zephyr-Assessment field activities begin and on-going. *(this is work plan #2)*
- 2013 June 2013 monthly status report by Zephyr-Findings listed and COCs on property PCL exceedances are listed. Further horizontal and vertical assessment work is needed. *(results of work plan #2)*
- 2013 August 2013 monthly status report by Zephyr-another work plan outlining further horizontal and vertical extents of affected groundwater both on and off property are in draft.
- 2013 Sept 6, 2013 letter from TCEQ to PSC approving another APAR extension to Feb 28, 2014.
- 2013 October 2013 Work Plan-VCP work plan #3 for VCP site #2480 by Zephyr submitted to TCEQ. Plano Public Works and Richardson Health Dept contacted to schedule MSD meeting.
- 2013 Dec 6, 2013 letter from TCEQ to PSC approving work plan 3. *(this is work plan #3)*
- 2014 May 2014 monthly status report by Zephyr-Access agreements sent to TxDOT and Custer/190 Joint Venture for off-property investigation. Awaiting responses from off-property owners.
- 2014 June 2014 monthly status report by Zephyr-Access agreement reached with Custer/190 Joint Venture and executed installation of off-property monitoring wells. Still waiting response from TxDOT.
- 2014 July 2014 monthly status report by Zephyr-Access agreement reached with TxDOT for off-property investigation. Work starts in August 2014.
- 2014 August 2014 monthly status report by Zephyr-5 GWBU1 and 2 GWBU2 MWs installed in August. Sampling from these 7 off-property wells and select on-property wells conducted per work plan 3. Data submitted to lab for analysis.

- 2014 October 2014 monthly status report by Zephyr-Each off-property landowners provided with summary of analytical results obtained from groundwater monitoring on their properties. Additional off-property sampling is considered once analysis is complete. *(results of work plan #3)*
- 2014 November 2014 monthly status report by Zephyr-After review of sampling and water level data, additional sampling should be performed. Need to get re-access to Custer/190 Joint Venture off-property wells for re-sampling. So 2015 Supplemental Work Plan is created and attached to this status report. *(this is supplement to work plan #3)*
- 2014 December 2014 monthly status report by Zephyr-Negotiating with Custer/190 Joint Venture for new off-property access agreement. Application to TxDOT for off-property access also being prepared.
- 2015 January 2015 status report by Zephyr-Negotiations with Custer/190 Joint Venture continue for off-property access continue.
- 2015 May 8, 2015; April 2015 status update by Zephyr-Negotiations with Custer/190 Joint Venture continue for off-property access continue.
- 2015 July 2015 status report by Zephyr-Negotiations with Custer/190 Joint Venture continue for off-property access continue.
- 2015 August 18, 2015 TCEQ interoffice memo-Custer/190 Joint Venture will not allow access to monitoring wells on their property unless PSC agrees to clean up their property to background levels and not pursue a MSD on their property.
- 2015 September 2015 monthly status report by Zephyr-Negotiations with Custer/190 Joint Venture have concluded with no agreement on access to their monitoring wells. PSC and Zephyr developing alternate plans.
- 2015 Sept 8, 2015 status update by Zephyr-TCEQ is amenable to amending APAR after MSDs are obtained. PSC is unable to reach agreement with Custer/190 Joint Venture, and alternate plans for assessing off-site COC extent and migration are being developed.
- 2015 November 6, 2015; Oct 2015 status update- TxDOT granted access to south off-property wells on GBT
- 2015 December 2015 monthly status report by Zephyr-Unable to get access to east side off-property for well monitoring. Created an alternate supplemental plan to assess COCs for migration attached to this report. *(this is alternative supplemental work plan #3)*
- 2015 December 2, 2015 letter-TCEQ letter to PSC/Zephyr extending APAR from Nov 30, 2015 to Nov 30, 2016.

- 2016 January 2016 monthly status report by Zephyr-Wells checked and levels published *(results of alternative supplemental work plan #3)*
- 2016 February 2016 monthly status report by Zephyr-Discussion with ex-ARCO employee about additional ASTs and USTs with limited documentation of existence and no closure documentation. Advise additional investigation.
- 2016 March 2016 monthly status report by Zephyr-Discussion about 4th work plan for additional ASTs and USTs
- 2016 May 27, 2016 investigation plan-Submission of Work Plan 4. This is for 3 undocumented USTs and horizontal and vertical extent of groundwater COCs.
- 2016 June 7, 2016 status update-PSC/Zephyr awaiting approval of Work Plan 4
- 2016 July 5, 2016 status update-PSC/Zephyr awaiting approval of Work Plan 4
- 2016 August 3, 2016 status update-PSC/Zephyr awaiting approval of Work Plan 4. Starting to prepare MSD application.
- 2016 August 16, 2016 letter-TCEQ approves Work Plan 4 and work will commence on MSD application. APAR due date is still Nov 30, 2016 as changed from Dec 2015. TCEQ reminds PSC that horizontal and vertical delineation has yet to be achieved on site and the site should still pursue delineation until the MSD has been certified. *(this is work plan #4)*
- 2016 September 6, 2016 status update-PSC plans to start on Work Plan 4 in Sept 2016, meanwhile work on MSD continues.
- 2016 October 2016 monthly status report by Zephyr-Work Plan 4 completed (7 new monitoring wells created, soil samples, and samples taken from existing wells). Collection for 3 new wells require development time so this is deferred to November 2016. MSD submitted to city of Plano on Oct 28, 2016. PSC requests 9 month delay of APAR from Nov 2016.
- 2016 October 31, 2016 status update-Work Plan 4 was executed in October. MSD application submitted to city of Plano.
- 2015 October 31, 2016 site closure request-PSC requests closure of Notice of Registration (NOR) for 12 waste management units (WMUs). 6 more WMUs will be addressed later.
- 2016 December 2016 monthly status report by Zephyr-Groundwater from 5 monitoring wells screened with GWBU 3 completed on Dec 20, 2016. These samples and other field and well samples sent to Xenco Labs on Dec 21, 2016. Reports were received on Dec 29, 2016 with results to be published in the APAR. Draft Release Determination Reports for newly discovered ASTs and USTs in review
- 2017 January 17, 2017; November 2016 status update-November 2016 field activities rescheduled for December 2016.

- 2017 February 14, 2017 TCEQ comments-TCEQ accepts closure of 7 WMUs, but 5 require more info. TCEQ accepts quarterly status reports instead of monthly status reports.
- 2017 February 21, 2017; December 2016 status update-Groundwater samples collected in December and sent to lab for analysis. Results received and will be documented in APAR.*(results from work plan #4 only will be published in APAR after MSD)*
- 2017 March 24, 2017 PST Release Determination-PSC submits Release Determination Reports for 3 former and 1 existing UST locations.
- 2017 April thru June 2017 quarterly status report by Zephyr-Set date for MSD application meeting and determine addresses for public notification.
- 2017 April 26, 2017 status update-no new info.
- 2017 June 9, 2017 approval letter-TCEQ letter to PSC accepting closure of last 5 WMUs.
- 2017 July 13, 2017 letter-TCEQ letter to PSC informing them of change of TCEQ program management for VCP#2480

Key documents above are posted in full at the attached links:
 Environmental Studies submitted to Texas Commission on Environmental Quality

Link to Key Documents- Dell Site at Custer & Plano Parkway

- 1 [Drinking Water Survey Report-Feb 2012.pdf](#)
- 2 [Env. Assessment-Feb 2012.pdf](#)
- 3 [Work Plan 1-May 2012.pdf](#)
- 4 [Results of Work Plan 1-Jan 2013.pdf](#)
- 5 [Work Plan 2-Feb 2013.pdf](#)
- 6 [Results of Work Plan 2-July 2013.pdf](#)
- 7 [Work Plan 3-Oct 2013.pdf](#)
- 8 [Results of Work Plan 3-Oct 2014.pdf](#)
- 9 [Supplemental Work Plan 3-Nov 2014.pdf](#)
- 10 [Alternate Supplemental Work Plan 3-Nov 2015.pdf](#)
- 11 [Results of Alt Supplemental Work Plan 3-Feb 2016.pdf](#)
- 12 [Work Plan 4-May 2016.pdf](#)

-End of documents received by TCEQ-

