

Bryan W. Shaw, Ph.D., *Chairman*  
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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 18, 2013

Mr. Earl Moran  
Cox Road Group  
1555 Poydras Street, Suite 1700  
New Orleans, Louisiana 70112

Re: Response Action Completion Report dated February 25, 2013, Cox Road Landfill, FM 1413 & CR 491, Liberty County, Texas; Voluntary Cleanup Program (VCP) No. 1922; RN104950233; CN601575392

Dear Mr. Moran:

The VCP of the Texas Commission on Environmental Quality (TCEQ) has received the Response Action Completion Report (RACR) dated February 25, 2013 prepared by Project Navigator, Ltd. After careful review, the TCEQ approves the RACR with the following comments. No response to these comments is required.

The TCEQ notes that the RACR and the "Construction Quality Assurance Report" both document that all components of the response action proposed in the Response Action Plan (RAP) dated June 8, 2009, have been completed according to the engineered design. All waste has been covered with a minimum of 18 inches of clay and a minimum of 6 inches of topsoil supporting a vegetative cover, totaling a minimum of 24 inches of soil cover.

With the completion of response action site activities, post-response action care activities are being initiated. The post-response action care associated with groundwater will be conducting annual sampling of the six offsite monitoring wells for three years. At the end of the three year groundwater monitoring period an evaluation will be made concerning the elimination of the post closure groundwater monitoring, and issuance of a Conditional Certificate of Completion for the site.

The first annual event is scheduled for October 2013 and a Response Action Effectiveness Report (RAER) in the form of a groundwater monitoring report will be

Mr. Earl Moran  
Page 2  
March 18, 2013  
VCP No. 1922

submitted upon receipt of final analytical data. Post-response action care will also include annual inspection, maintenance of the vegetated clay cover at the site.

Please contact me at (512) 239-3044 if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Mark R. Riggle". The signature is written in a cursive, slightly slanted style.

Mark R. Riggle, P.G., Project Manager  
VCP-CA Section  
Remediation Division  
Texas Commission on Environmental Quality

MRR/jdm

cc: Mr. Philip Jen, P.G., Project Navigator, Ltd., Houston, Texas  
Ms. Nicole Bealle, Waste Section Manager, TCEQ Region 12 Office, Houston