Item Barcode: 40084659

LEAKING PETROLEUM STORAGE

LPST FL 050

WST LPST #: 0019699 092195

File Type: CORRESPONDENCE

Volume: 001

Media Code/ Form

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 11, 1999

Mr. James F. Holloway
Capital Wire and Cable
910 10th St.
Plano, TX 75074

Re: Subsurface Release of Hydrocarbons at Capital Wire and Cable, 900 Ave F, Plano (Collin County), Texas
(LPST ID No. 92195 - Priority 4.2 - Facility ID No. 0019699)

Dear Mr. Holloway:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon the submitted information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, we concur with your certification that the closure requirements have been met. No further corrective action for the release incident is necessary. The justification for final closure includes but is not limited to the following criteria:

- BTEX levels in soil were found to be non-detectable at the subject site.
- TPH concentrations in the soil were above TNRCC action levels. However, the contaminated soil was disposed of at a landfill, where higher levels of TPH are allowable.
- There is no affected groundwater or surface water in close proximity to this site.

For any subsequent release from an underground or aboveground storage tank at this site, the deductible will be increased in accordance with Section 26.3512 of the Texas Water Code. Please note that financial assurance must be maintained for all operational storage tanks at this site. Please be aware that case closure is based on identified exposure pathways and that any remaining contaminant levels and potential exposure pathways should be evaluated when conducting any future soil excavation or construction activities at this site. Please ensure that any wastes generated from these activities are handled in compliance with all applicable regulations.

Please be advised that all monitor wells which are not now in use and/or will not be used in the next 180 days must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title 30, Texas Administrative Code (TAC), Section 238.48-238.50.

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

TO : FILE **DATE**: May 7, 1999

THRU : Bob Beleckis
Team Leader, RPR Team III
Responsible Party Remediation Section

FROM : Brandy Maxfield, Coordinator, Team III
Responsible Party Remediation Section

SUBJECT : File Review For Closure of Subsurface Release of Hydrocarbons at Capital Wire and Cable, 900 Ave F, Plano, (Collin County), Texas
(LPST ID No. 92195 - Priority 4.2 - Facility ID No. 0019699)

A gasoline spill of an unknown amount was reported to the TNRCC on July 8, 1988. A visual observation was made that unleaded gasoline had leaked at a fill tube connection, most likely due to either corrosion or improper installation. The tanks previously on-site included one (1) 6,000-gal isopropyl alcohol tank, one (1) 4,000-gal gasoline and one (1) 8,000-gal gasoline underground storage tanks (USTs).

A minimal site assessment was performed in July of 1988, after the discovery of the release. Seven (7) soil borings were drilled to obtain soil samples and determine the extent of contamination. Concentrations for benzene, toluene, ethyl benzene, and total xylenes were all non-detectable. Maximum total petroleum hydrocarbons (TPH) were analyzed at 434 ppm.

The incident report, dated September 21, 1988, indicates that neither groundwater, nor surface water is affected. In addition, there is no known surface water in close proximity to this site. Therefore, it is my recommendation that no further corrective action is warranted, and a final concurrence letter should be issued to the responsible party based on the following:

- BTEX levels in soil were found to be non-detectable at the subject site.
- TPH concentrations in the soil were above TNRCC action levels. However, the contaminated soil was disposed of at a landfill, where higher levels of TPH are allowable.
- There is no affected groundwater or surface water in close proximity to this site.

Based on the above conditions and the recent closure criteria established by the TNRCC, it is my opinion that the contaminant levels remaining at this site will not pose a risk to human health and the environment, and that a letter of final concurrence should be issued for this site.

Brandy L. Maxfield
Coordinator
PST Responsible Party Remediation Section, Team III

BLM/blm
92195.iom

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : JACKSON H. KRAMER, Director
Petroleum Storage Tank Division

DATE: 11/26/90

THRU : JEFFIE BARBEE, PST Coordinator,
Field Operations Division

FROM : Dixon Bunt, Environmental Quality Specialist
District 4

SUBJECT: Subsurface Release of Oil at Capitol Wire and Cable, 910 10th Street, Plano (Collin County), Texas
(LUST ID No. 97300) (Facility No. 46665)

ATTENTION: Ronald Pedde, Head, Responsible Party Remediation Section

On July and August 1990 an underground storage tank which had contained oil was removed from the above referenced facility. According to Mr. Tom Jorgenson (Plant Manager) this oil in the tank was called rolling compound oil and was not waste oil. Based on observations and on sample analytical results of soil collected from the floor and sidewalls of the tank pit, it appears that a release of oil has occurred at Capitol Wire Cable.

Accordingly, a copy of the Priority 3 CAD letter issued by this Office and a copy of the LUST Incident Report form are submitted for your review.

This is submitted for your information.

Dixon Bunt

Approved

DB

Attachments

TEXAS WATER COMMISSION

November 26, 1990

CERTIFIED MAIL P 371 462 097

Mr. Tom Jorgenson
Capitol Wire and Cable
910 10th Street
Plano Texas 75074

RE: Subsurface Release of Oil at Capitol Wire and Cable Company, 910 10th Street, Plano (Collin County) Texas
(LUST No. 97300)

Dear Mr. Short:

In July and August of 1990 an 8000 gallon steel underground storage tank (UST) which contained oil was removed from the above referenced facility. Based on sample analytical analysis of soil collected from the tank pit, it appears that a release of oil has occurred from the removed tank.

The Texas Water Commission (TWC) is responsible for protecting the quality of state waters as well as public health and safety when a release occurs from an underground storage tank system. Title 31, Texas Administrative Code (TAC) Chapter 334 requires the owners or operators of an underground storage tank system to immediately abate and remove releases that may occur. In order to determine the degree of remediation necessary to address this incident, you are requested to include in an environmental assessment report to this office the following information:

1. A complete description of the release incident including the cause, an estimate of the volume of product lost, and the measures taken to eliminate the source of the release.

2. A determination of the vertical and horizontal extent of surface contamination and an account of the procedures utilized to support this determination. The term "subsurface contamination" includes not only the presence of free product, but also any dissolved-product contamination of the groundwater and residual contamination of soils.

3. A site characterization which provides a description of local soil, geology, and groundwater conditions. If any groundwater is threatened or already been impacted, you must also provide a water-table gradient map and a water well inventory. this inventory must locate, on a current U. S. G. S. topographic map, all water wells within a one-half mile radius of the site and provide all available information pertaining to each well. It is also necessary that you provide copies of all State of Texas Water Well Reports (Form No. WWD-012) for any installed monitor wells as is required under the Texas Water Well Driller's Act.

4. A site map drawn to scale indicating the location of the entire underground storage tank system and all nearby buried utilities, structures and roads. This map should also provide the location of any excavated areas and the collection points for all soil and water samples.

5. Laboratory reports providing the results of all sample analyses and a description of sample collection and analytical procedures. Only EPA-approved methods will be accepted for collection and analysis of samples utilized to determine waste classifications and final cleanup levels.

6. An account of the disposition of all contaminated soils and water, recovered or recycled product, or any associated wastes. If any wastes are transported off-site for disposal or recycling, copies of signed receipts from the receiving facility as well as any requested uniform hazardous waste manifests must be included.

7. A city or county map depicting the facility's location and photographs documenting observable impacts, excavations, stockpiled soils, and any on-site treatment activities.

8. Finally, based upon the results of the assessment, a proposal for the completion of site remediation. If any evidence exists indicating the presence of free phase product accumulation in any monitor wells, the tankhold, piping trenches, etc., immediate removal measures must be implemented. Daily observations should be made and appropriate action pursued to ensure that all product is continuously removed.

Please note that you are required to notify Mr.Dixon Bunt of our District 4 Field Office in Duncanville at 214/298-6171 at least 48 hours in advance of any major excavation or other remedial activities. If remediation activities determine that the extent of contamination is significantly greater than initially estimated or that groundwater has been impacted, you are required to notify Mr. Bunt immediately.

Also be advised that TWC approval must be granted before you may initiate any on-site treatment to reduce contaminant levels of affected soils and/or water. Fugitive air emissions (i.e., vapors, odors) must be controlled and monitored at all times to protect human health and safety.

We request that a response to this letter describing your activities to date and including a schedule for expeditious submittal of the completed site assessment study and remediation proposal to this Office no later than 60 days upon receipt of this letter. Copies of this report or any other correspondence with this Office must be provided to our Central Office to the attention of Ronald Pedde, Responsible Party Remediation Section, Petroleum Storage Tank (PST) Division, P. O. Box 13087 Capitol Station, Austin, Texas 78711.

Should you have any questions or require guidance please contact Mr. Bunt or Mr. Sid Slocum at 214/298-6171. Your cooperation in this matter will be appreciated.

Sincerely,

Charles D. Gill
District Manager

DB

cc: Ronald Pedde, TWC Responsible Party Remediation Section

46665
Facility ID No.

Texas Water Commission
Petroleum Storage Tank
RELEASE INCIDENT REPORT

97300
PST ID No.

Check One: Aboveground Storage Tank (AST) [] Underground Storage Tank (UST) [X]

Disc. Date 1/8/90 TWC Notif. Date 1/8/90 PST Notif. Date __/__/__

Confirmed Release: Yes [X] No []

Reported/Discovered by: Paul Lindsey Phone: (214) 423-6565

Representing: Engineers & Erectors

Reported to: Dixon Burt

How Reported/Discovered: [] TWC Inspection [X] Telephone Call [] Written Report
[] Other

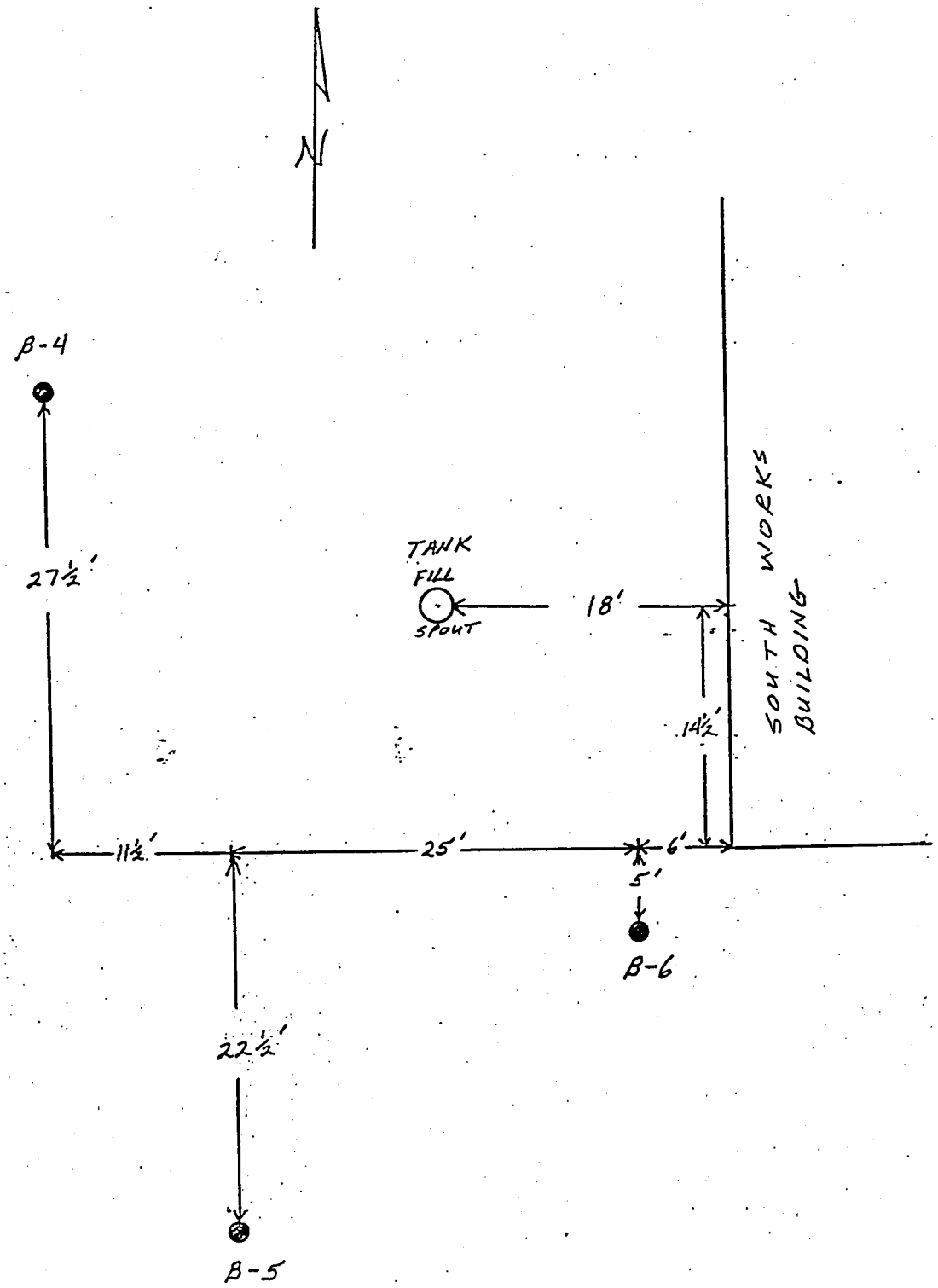
Priority: [] 1 [] 2 [X] 3A Status: [X] 1A [] 2 [] 3 [] 4 [] 5 Primary Coordinator [X] 1. Corrective Action A&M [] 2. District [] 3. Contracts [] 4. Enforcement [] 5. EPA

County: Collin
( ) Code Number
TWC District 4

Possible Responsible Party: Capitol Wire & Cable
Address: 910 10th Street
City: Plano State: TX ZIP 75074
Contact: Tom Jorgenson Phone: (214) 423-6565

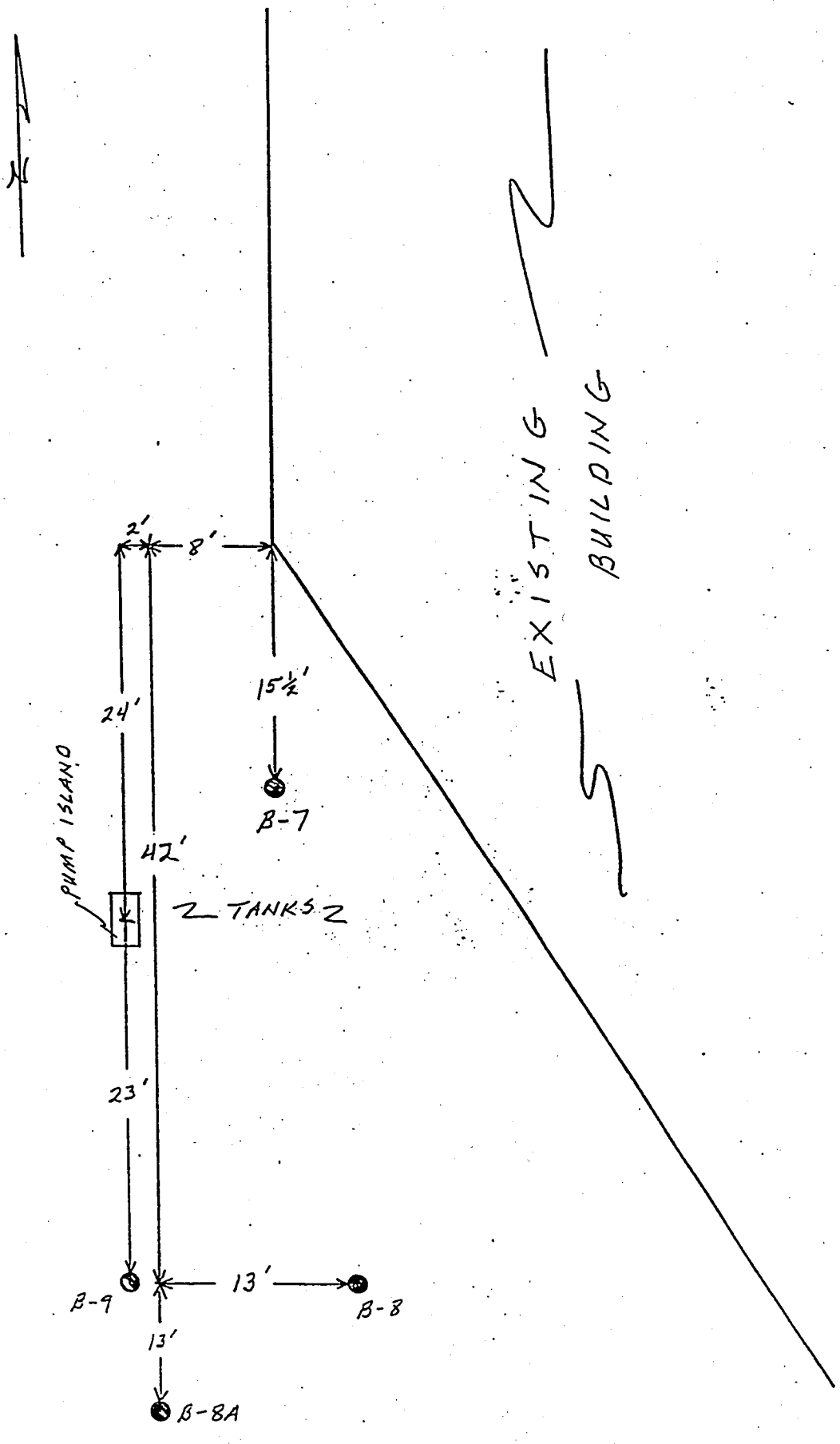
Location of Release
Name of Facility: Capitol Wire Cable
Facility Address: 910 10th Street
Facility City: Plano ZIP 75074
Other Location Information:

LEAK CAUSE: [X] 1. Tank [] 2. Line [] 3. Overfill [] 4. Other [] 5. Unknown
Detection Method/Description: Closure soil samples



PLAN OF BORINGS
ISOPROPYL ALCOHOL TANK

NOT TO SCALE



PLAN OF BORINGS
GASOLINE TANKS

92195

RECEIVED
CENTRAL RECORDS

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
MR. JAMES F HOLLOWAY
CAPITAL WIRE AND CABLE
910 10TH ST. PO BOX 7
PLANO, TX 75074

(LPST #: 092195.lnp)

4a. Article Number Z 435652284

4b. Service Type X
☐ Registered ☐ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery 11/12/98

5. Received By: *(Print Name)* RECEIVED

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)* NOV 16 1998
X

PS Form **3811**, December 1994 INRCC/PST 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

INCIDENT CLOSURE SUMMARY CHECKLIST

LPST ID 092195 NAME: Capital Wire & Cable

FAC ID 0019699

CITY Plano COUNTY Collin PRIORITY: 4

REGION: 04

SITE INFORMATION

CURRENT USE: ☐ STATION ☐ RESIDENTIAL ☒ UNKNOWN ☐ OTHER _____

☐ COMMERCIAL / INDUSTRIAL _____

STATUS: ☐ ACTIVE ☐ INACTIVE ☐ ABND/VACANT ☐ DEMOLISHED

FUTURE USE: ☐ STATION ☐ COM/IND _____ ☐ RES ☐ VACANT ☒ UNK ☐ OTHER _____

TANKS/EQUIPMENT: ☐ ACTIVE ☒ REMOVED ☐ ABND-IN-PLACE

IMPERVIOUS COVER OVER SITE? ☐ NO ☐ YES ☐ 25-75% ☐ 75-100%

ANY BUILDINGS? ☐ NO ☐ IN USE ☐ VACANT

RELEASE INFORMATION

DATE RPT'D: 7-8-88 ☒ TANK REMOVAL ☐ REPAIRS ☐ ASSESSMENT ☐ REL DET

TYPE: ☒ GASOLINE ☐ DIESEL ☐ WASTE OIL ☐ HYDR OIL ☐ OTHER

SOURCE: ☐ UST ☐ AST ☐ LINE ☐ DISPENSER ☒ SPILL/OVERFILL ☐ OTHER _____

AMOUNT: _____ gallons ☒ UNKNOWN RELEASE ABATED? ☒ YES ☐ NO

CONFIRMED (i.e. tanks removed, tightness test, etc)? _____

REMOVAL INFORMATION

TANKS/SIZE: 1. (1) 6,000-isopropyl alcohol tank 2. _____ 3. (1) 4,000-gal gasoline 4. (1) 8,000-gal gaso 5. _____

DATE REMOVED: 1988 REMOVAL INSPECTED BY TNRCC? ☐ NO ☒ YES ☐ UNKNOWN

TANK CONDITION: ☒ UNKNOWN ☐ GOOD (no visible holes) ☐ FAIR ☐ POOR (holes observed)

VISIBLE CONTAMINATION? ☐ UNKNOWN ☐ NO ☒ YES

BACKFILL REMOVED? ☐ UNKNOWN ☐ NO ☒ YES _____ cu. yds MANAGED? ☐ NO ☐ YES

TANKHOLD OVER-EX? ☐ UNKNOWN ☐ NO ☒ YES _____ cu. yds MANAGED? ☐ NO ☐ YES

STOCKPILE CURRENTLY ONSITE? ☐ UNKNOWN ☒ NO ☐ YES _____ cu. yds

WATER IN TANKHOLD? ☐ UNK ☐ NO ☒ YES REMOVED? _____ gallons ☐ GW ☐ OTHER _____

REMARKS: _____

ASSESSMENT INFORMATION

TYPE: ☒ MSA ☐ LSA ☐ CSA ☐ RBA ☐ OTHER _____

CATEGORY GW: _____ MUNICIPAL WATER SUPPLY? ☐ NO ☒ YES

NUMBER OF BORINGS? 7 NUMBER OF EXISTING MWs? 0

RECEPTOR SURVEY: ☐ YES ☒ NO RECEPTORS W/I 500' ? ☐ YES ☐ NO ☐ UNK

UTILITIES AFFECTED? ☐ KNOWN ☐ UNKNOWN DEPTH: _____

ANY SCHOOLS, NURSING HOMES, ETC. W/I 500' ? ☐ UNKNOWN ☐ NO ☐ YES TYPE: _____

SURFACE WATERS, SPRINGS, SEEPS W/I 500' ? ☐ YES ☒ NO ☐ UNKNOWN

SENSITIVE HABITAT, WETLANDS W/I 500' ? ☐ NO ☒ YES TYPE: _____

WATER WELL SURVEY: ☐ YES ☒ NO

WATER WELLS WITHIN ONE-HALF MILE: No. _____ AVE. PRODUCING DEPTH: _____

WITHIN 1200' ? ☐ NO ☐ YES _____ WITHIN 500' ? ☐ NO ☐ YES _____

GRADIENT? ☐ UP ☐ DOWN GRADIENT? ☐ UP ☐ DOWN

ANY WELLS W/I 1,200' SCREENED IN AFFECTED ZONE? ☐ YES ☐ NO ☐ UNKNOWN

DEEPER ZONE PATHWAY? ☐ NO ☐ KNOWN ☐ PROBABLE ☐ POTENTIAL ☐ UNLIKELY

COMPLETION INFO? ☐ UNKNOWN ☐ YES ☐ NO

POTENTIAL VAPOR PROBLEMS? ☒ NO ☐ YES ☐ MEASURED ☐ CALCULATED

POTENTIAL DERMAL EXPOSURE? ☒ NO ☐ YES

REMARKS: _____

_____

GROUNDWATER

EST. DEPTH TO GW: N/A bgs PSH? ☐ NO ☐ YES ____ ft ☐ REMOVED _____ gallons

MAJOR AQUIFER? ☐ NO ☐ YES _____ MINOR? ☐ NO ☐ YES _____

CHARACTERISTICS: ☐ PERCHED ☐ CONFINED ☐ SEMI-CONFINED ☐ UNCONFINED

TDS: _____ ppm YIELD > 150 gpd: ☐ YES ☐ NO

PLUME DEFINED? VERTICAL: ☐ YES ☐ NO HORIZONTAL: ☐ YES ☐ NO

SIZE?: ☐ STABLE ☐ INCRSG ☐ DECRSG CONCENTRATION?: ☐ STABLE ☐ INCRSG ☐ DECRSG

PREDOMINANT GRADIENT DIRECTION: _____

OFF-SITE MIGRATION? ☐ NO ☐ KNOWN ☐ PROBABLE ☐ POTENTIAL ☐ UNLIKELY

REMARKS: _____

_____

LABORATORY ANALYSES

SOIL - REMOVAL

CONSTITUENT	MAX. BEFORE EXCAVATION	MAX. AFTER EXCAVATION	
BENZENE	_____ ppm	_____ ppm	_____
TOLUENE	_____ ppm	_____ ppm	_____
ETHYLBENZENE	_____ ppm	_____ ppm	_____
XYLENES	_____ ppm	_____ ppm	_____
TPH	_____ ppm	_____ ppm	_____

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES ☐ UNKNOWN

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES ☐ UNKNOWN

REMARKS: _____

SOIL - ASSESSMENT

	MAX. CONC.	DEPTH	BRG / MW	MAX. CONC.	DEPTH	DATE
BENZENE	non-detect ppm	_____	_____	_____ ppm	_____	_____
TOLUENE	_____ ppm	_____	_____	_____ ppm	_____	_____
ETHYLBENZENE	_____ ppm	_____	_____	_____ ppm	_____	_____
XYLENES	_____ ppm	_____	_____	_____ ppm	_____	_____
TPH	434 ppm	_____	B-	_____ ppm	_____	9-16-88

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES _____

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES _____

HAS VERTICAL EXTENT BEEN DETERMINED? ☐ NO ☐ YES _____ max depth

REMARKS: _____

N/A GROUNDWATER

CONSTITUENT	MAX. CONC.	MW	DATE	TIME FRAME
BENZENE	_____ ppm	_____	_____	_____
TOLUENE	_____ ppm	_____	_____	_____
ETHYLBENZENE	_____ ppm	_____	_____	_____
XYLENES	_____ ppm	_____	_____	_____
TPH	_____ ppm	_____	_____	_____

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES _____

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES _____

TOTAL No. MONITORING EVENTS? _____ CONC. DECREASING? ☐ NO ☐ YES

REMARKS: _____

Potential Immediate Exit Criteria Following Risk-Based Assessment
Single Sampling Event

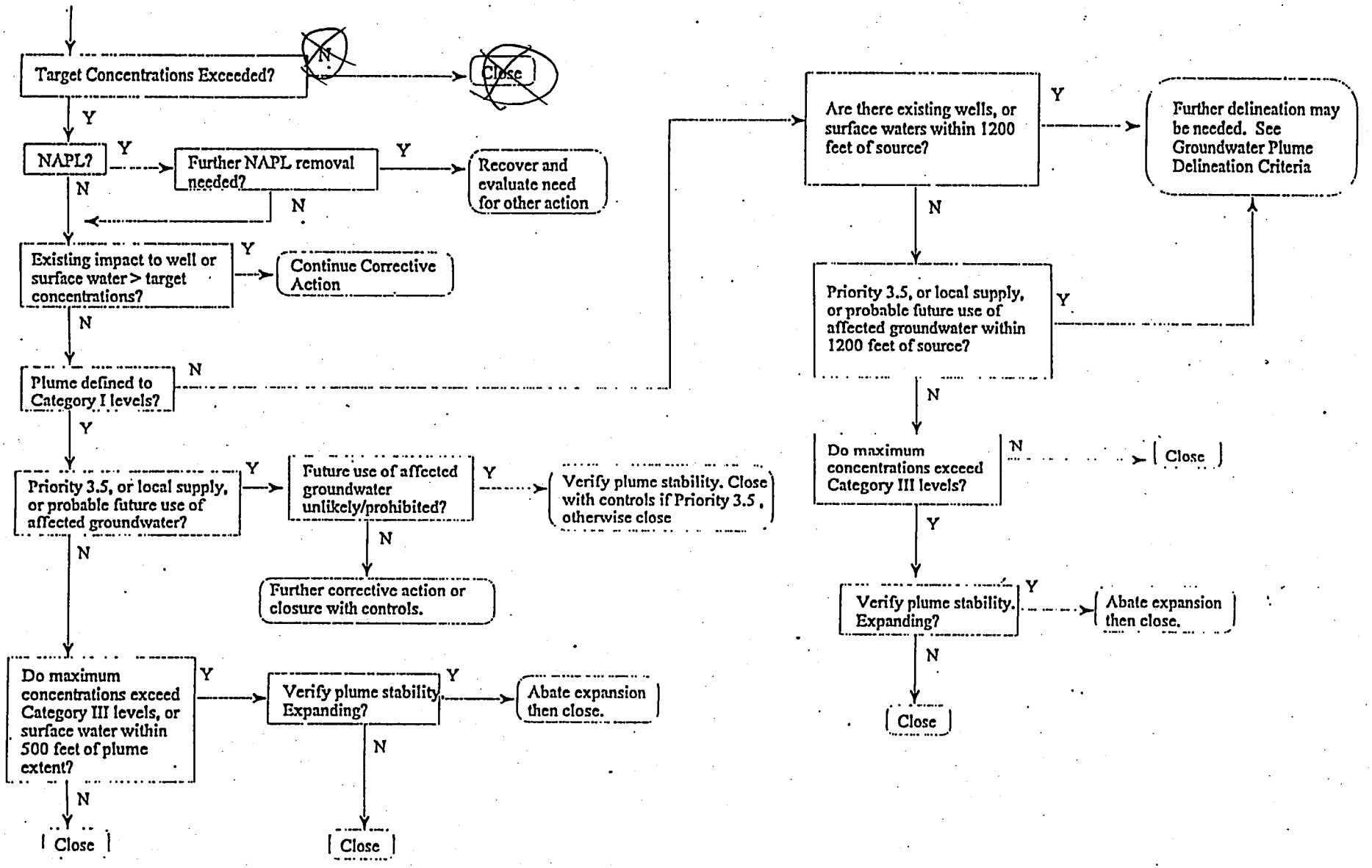
Soils Only Impact	Soils and Groundwater Impact	Target Soil Concentrations Met[a]		Target Groundwater Concentrations Met[b,c]	Historical Release[d]	No Wells Within	No Surface Waters Within[e]	Municipal Water Supply Available[f]	Priority
		Human Health	Soil-to-Groundwater[b]						
x		x	x						4.2
x		x			x	500 ft	500 ft	x	4.2
	x	x	x	x	x	500 ft	500 ft	x	4.1
	x	x	x	x	x	1200 ft	1200 ft	x	3.5[g]

a. No NAPL
b. Vertical delineation should be complete and appropriate, and demonstrate generally declining concentrations with depth. Additionally soil samples should be representative, and there should be no concerns regarding preferential pathways (e.g., fractured bedrock, karst).
c. Groundwaters must be Category I-III. If category IV groundwater, and Category III standards exceeded, then additional monitoring/evaluation warranted to ensure no other hazard.
d. Recent release could be considered if know of minor nature. Primarily considering sites which are likely static or declining conditions.
e. Groundwater/Surface Water interconnection should be likely.
f. The municipal supply is not the affected groundwater body.
g. Or local supply.

Figure 1

Groundwater Pathways (See also Figure 2)

N/A



NA

Figure 2

Groundwater Pathway - Groundwater Depth ≤ 15 Feet, or Within Typical Construction Depth

(Criteria for Figure 1 must also be met)

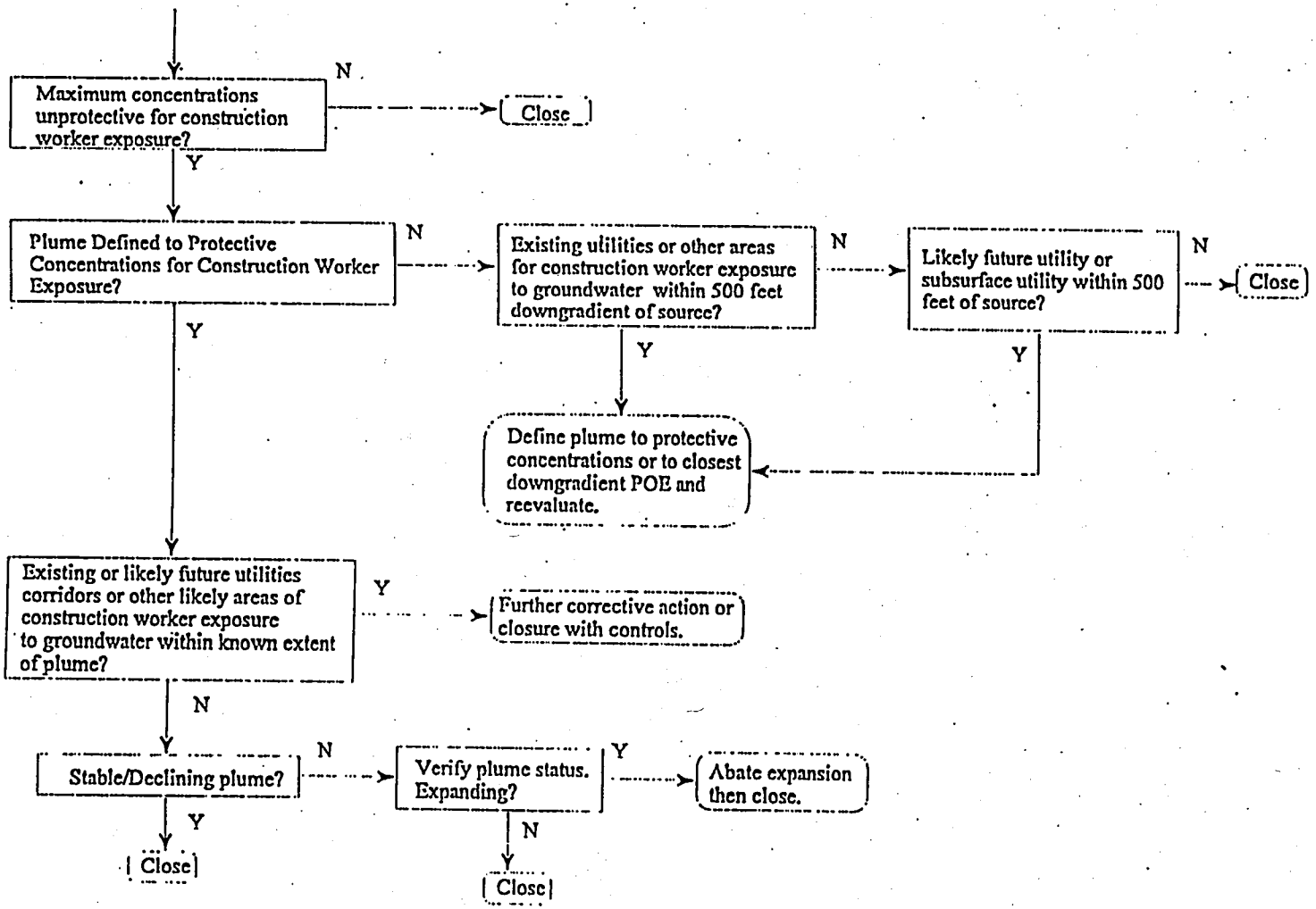


Figure 3

Soils Pathways

Evaluate all three pathways

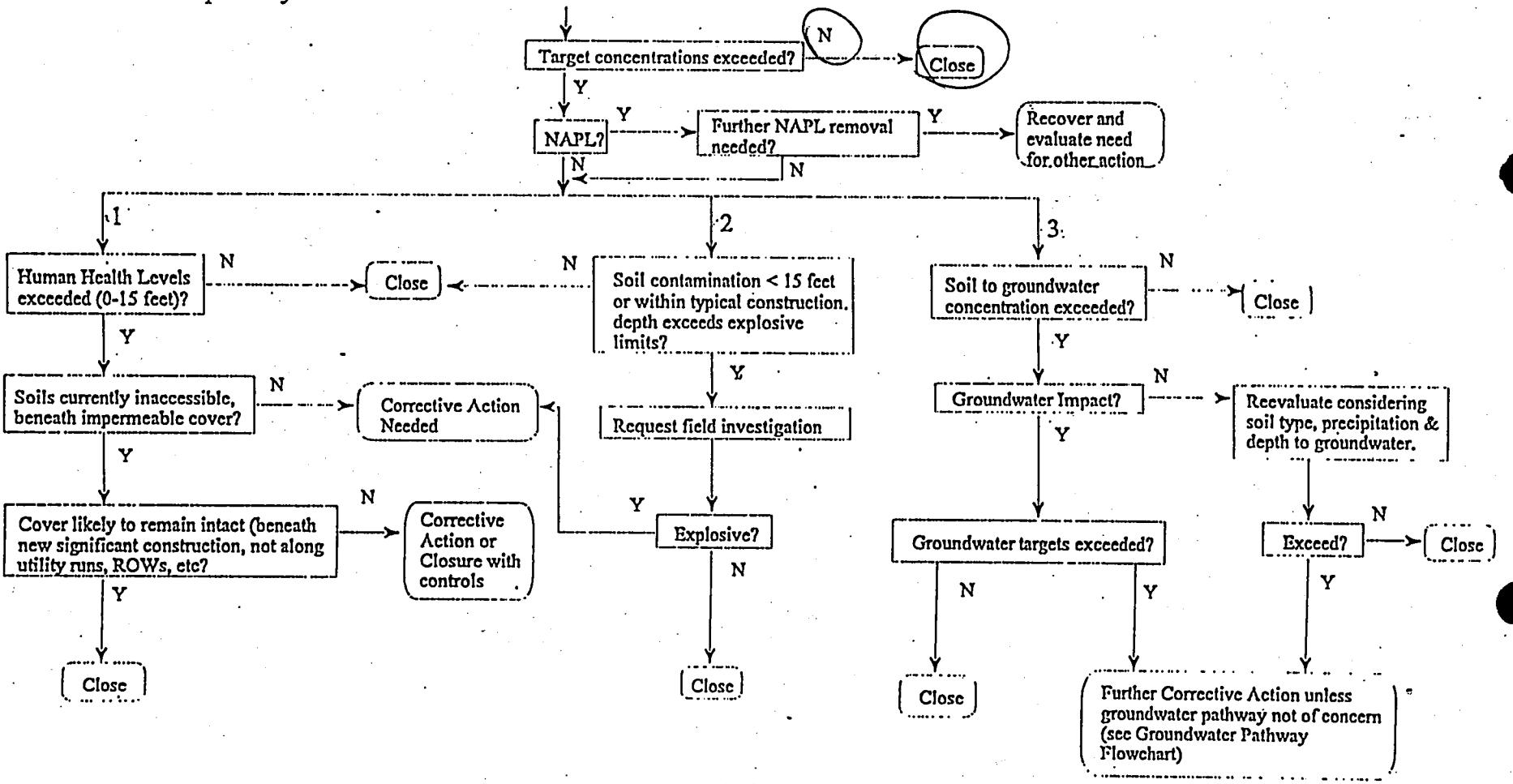
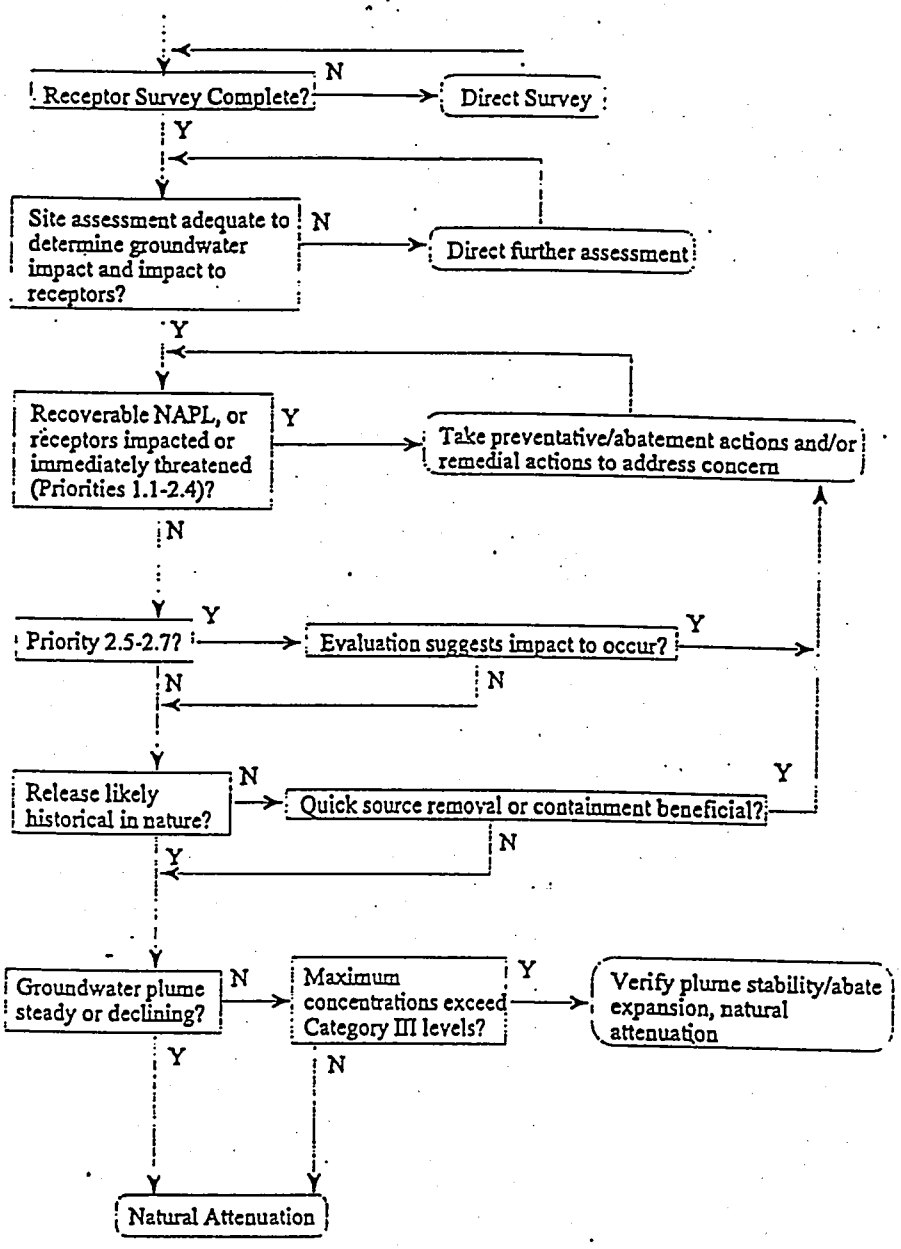


Figure 4

Criteria for Natural Attenuation Preference
Petroleum Hydrocarbon LPST Groundwater Sites



Groundwater Plume Delineation Criteria

	Groundwater Scenario	Delineation Extent
1	Existing water supply well within 1200 feet of source area.	Define to POE; or to 1 order of magnitude less than Plan A Category I level or POL, whichever is greater concentration. Verify plume stability.
2	Priority 3.5 or local supply, or 0.5 mile water well survey indicates an existing water supply well downgradient beyond 1200 feet	Use modeling to project concentration at 1200 feet. Confirm stable or declining trend. Modeling result should not exceed Plan A Category I concentrations.
3	Probable future groundwater use within 500 feet.	Define to Plan A Category I levels. Verify plume stability.
4	Surface water within 1200 feet downgradient of source	Define to POE, or to surface water criteria. Modeling evaluation could be conducted to demonstrate protective concentrations at lesser distance. Verify plume stability. (If plume defined to Plan A Category I levels, further delineation may be unwarranted unless judge potential for impact to surface water.)
5	Groundwater ≤ 15 feet deep or within typical construction depth and existing utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
6	Groundwater ≤ 15 feet deep or within typical construction depth and likely future utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
7	No existing receptors within 1200 feet of source and no likely future receptors within 500 feet of source.	Accept delineation to Plan A Level Category III level as adequate. When plume is not defined to Plan A Category III criteria, then sufficient downgradient definition should exist to show declining concentrations with distance from source. When maximum on-site concentrations exceed Category III levels, verify plume stability.
8	Fractured Bedrock or Karst Environments	Focus primarily on protection to receptors (possible monitoring likely receptors). Delineation should be attempted to Category I levels (unless an unused source), and abate source area as possible.
9	Other Exposure Pathways (groundwater to indoor air, explosive concentrations).	When these issues are of concern at sites, then delineation to protective concentrations for these pathways should occur.

Criteria for Likely Future Receptor:

Groundwater Use:
Priority 3.5 or local water supply (Note: local supply is indicated if water well survey indicates routine use of the affected groundwater body)
No Prohibitions on Use
Residential Area, particularly rural
Absence of municipal supply

Assume 5 year benzene half life.

COORD. OFFICE
(UST Enf., UST Contracts, or DFO)

TEXAS WATER COMMISSION

LEAKING UNDERGROUND STORAGE TAGK

INCIDENT REPORT

92195
LUST ID. NO.

SOL.WST.REG.NO.
(if applicable)

WN-35 BY

STATUS INFORMATION

UST REG #: 0019699 LUST PRIORITY: III

LUST DISCOV DATE: 7/8/88 TWC NOTIF DATE: 7/8/88

REPORTED BY: James Berry PHONE: (214) 638-7404

REPRESENTING: J-B-H Service & Equipment, Inc. 214-263-1619 (metro)

REPORTED TO: Siena Evans

On July 7, 1988, This was reported as a tank removal by James Berry. No LUST was mentioned. July 8, 1988 This was discovered to be a priority IV LUST.

SUBSTANCES RELEASED

PETROLEUM PRODUCT(S) RELEASED: unleaded EST.VOL. unk gal.s

HAZARDOUS SUBSTANCE RELEASED: N/A EST.VOL. N/A gal.s

RELEASE DETECTION METHOD: Visual Observation
(Routine Monitor, Tank Test, Visual Observation; Other)

COMMENTS: Unleaded gasoline leaked at fill tube / bung connection when gas went above that connection.

LOCATION OF RELEASE

NAME OF FACILITY: Capital Wire and Cable.

FACILITY ADDRESS: 900 Ave. F. PHONE: (214) 423-6565

FACILITY CITY: Plano COUNTY: Collin (043) (Code #) ZIP: 75074

OTHER LOCATION INFO: none.

RECEIVED
OCT 4 1988
FIELD OPERATIONS

RESPONSIBLE PARTY

TANK OWNER/COMPANY: Capital Wire & Cable.

MAILING ADDRESS: 910 10th St, P.O. Box 7

CITY: Plano STATE: TX

PHONE: (214) 423-6565 ZIP CODE: 75074

CONTACT (NAME/TITLE): Phil Pringle / vice president

OCT 05 88

Revised 6/88

7-8-88

AFFECTED WATERS

GROUNDWATER AFFECTED?: No (Yes, No, Unknown) SURFACE WATER AFFECTED?: No (Yes, No, Unknown)

GROUNDWATER STATUS: Usable (Usable, Unusable, Unknown) SURFACE WATER STATUS: No known surface water in close proximity to this site.

COMMENTS: None.

RELEASE DATA

RELEASE ORIGIN: Fill Tube / bung connection - overfills. (Tank, Lines, Overfill, Intentional Release; Specify if other)

RELEASE CAUSE: Possibly corrosion and/or improper installation. (Corrosion, Equip. Failure, Human Error, Improper Installation, Other)

AFFECTED MEDIA: Soil (Soil, Subsurface Utilities, Habitations, Other)

RELEASE DESCRIPTION: When gasoline filled the inside of the fill tube unleaded gas leaked at the fill tube / bung connection.

ANTICIPATED HAZARDS

HAZARDS/THREATS DESCRIPTION: None.

TWC DIRECTIVES/TO WHOM: Minorized CAD letter sent to Phil Pringle of Capital Wire and Cable. Contamination was minimal. Clean up finalized through District 4 directives.

INITIAL AND CURRENT RESPONSE/BY WHOM: Monitor wells installed, consultant hired for contamination assessment / remediation, Tanks to be removed - Set up by Phil Pringle prior to TWC notified.

MANAGEMENT DATA

INSPECTION BY TWC: Yes/ (Yes or No/Date) INSPECTOR NAME/OFFICE: Sierra Evans / Dist. 4.

UST COORDINATOR: Sierra Evans DIST. COORDINATOR: Sierra Evans

OTHER AUTHORITIES INVOLVED: Southern Waste Management

ERU NOTIFICATION: ____ (Check when complete) REFERRAL DATE: ____

SIGNED BY: C. Sierra Evans DATE SIGNED: 9/21/88

APPROVED BY (Optional): [signature] DATE APPROVED: ____

Revised 6/88

COORD. OFFICE (UST Enf., UST Contracts, or DFO)

TEXAS WATER COMMISSION

LEAKING UNDERGROUND STORAGE TANK

INCIDENT REPORT

LUST ID. NO.

SOL.WST.REG.NO. (if applicable)

STATUS INFORMATION

UST REG #: 0019699
LUST PRIORITY: IV
LUST DISCOV DATE: 7/8/88
TWC NOTIF DATE: 7/8/88
REPORTED BY: James Berry
PHONE: (214) 638-7404
REPRESENTING: J-B-H Service & Equipment, Inc. 214-263-1619 fax
REPORTED TO: Sierra Evans
On July 7, 1988, This was reported as a Tank removal by James Berry. No LUST was mentioned. July 8, 1988 This was discovered to be a priority IV LUST.

SUBSTANCES RELEASED

PETROLEUM PRODUCT(S) RELEASED: unleaded
EST.VOL. UNK gal.s
HAZARDOUS SUBSTANCE RELEASED: N/A
EST.VOL. N/A gal.s
RELEASE DETECTION METHOD: Visual Observation
(Routine Monitor, Tank Test, Visual Observation; Other)
COMMENTS: Unleaded gasoline leaked at fill tube / bung connection when gas went above that connection.

LOCATION OF RELEASE

NAME OF FACILITY: Capital Wire and Cable.
FACILITY ADDRESS: 980 Ave. F.
PHONE: (214) 423-6565
FACILITY CITY: Plano
COUNTY: Collin (043) (Code #)
ZIP: 75074
OTHER LOCATION INFO: None.

RESPONSIBLE PARTY

TANK OWNER/COMPANY: Capital Wire & Cable.
MAILING ADDRESS: 910 10th St, P.O. Box 7
CITY: Plano
STATE: TX
PHONE: (214) 423-6565
ZIP CODE: 75074
CONTACT (NAME/TITLE): Phil Pringle / Vice president

Revised 6/88

AFFECTED WATERS

GROUNDWATER AFFECTED?: No (Yes, No, Unknown) SURFACE WATER AFFECTED?: No (Yes, No, Unknown)

GROUNDWATER STATUS: Usable (Usable, Unusable, Unknown) SURFACE WATER STATUS: No known surface water in close proxim to this site.

COMMENTS: None.

RELEASE DATA

RELEASE ORIGIN: Fill Tube / bung connection - overfills. (Tank, Lines, Overfill, Intentional Release; Specify if other)

RELEASE CAUSE: Possibly corrosion and/or improper installation (Corrosion, Equip. Failure, Human Error, Improper Installation, Other)

AFFECTED MEDIA: Soil (Soil, Subsurface Utilities, Habitations, Other)

RELEASE DESCRIPTION: When gasoline filled the inside of the fill tube unleaded gas leaked at the fill tube / bung connection.

ANTICIPATED HAZARDS

HAZARDS/THREATS DESCRIPTION: None.

TWC DIRECTIVES/TO WHOM: Minorized CAD letter sent to Phil Pringle of Capital Wire and Cable. Contamination was minimal. Cleanup finalized through District 4 directives.

INITIAL AND CURRENT RESPONSE/BY WHOM: Monitor wells installed, consultant hired for contamination assessment / remediation, Tanks removed - Set up by Phil Pringle prior to TWC notified.

MANAGEMENT DATA

INSPECTION BY TWC: Yes / (Yes or No/Date) INSPECTOR NAME/OFFICE: Sierra Evans / Dist. 4.

UST COORDINATOR: Sierra Evans DIST. COORDINATOR: Sierra Evans

OTHER AUTHORITIES INVOLVED: Southern Waste Management

ERU NOTIFICATION: ____ (Check when complete) REFERRAL DATE: ____

SIGNED BY: C. Sierra Evans DATE SIGNED: 9/21/88

APPROVED BY (Optional): ____ DATE APPROVED: ____

Revised 6/88

September 13, 1988

CERTIFIED MAIL #P 453 192 168
RETURN RECEIPT REQUESTED

Mr. Phil Pringle, Vice President
Capital Wire and Cable
P. O. Box 7
Plano, Texas 75074

RE: Subsurface Release of Unleaded Gasoline at Capital Wire and Cable, 900 Avenue F, Plano (Collin County), Texas (Facility No. 0019699)

Dear Mr. Pringle:

On July 8, 1988, our representative, Ms. Sierra Evans, conducted a tank removal inspection of the above-referenced facility. Collette Cyr, of Southern, and James Berry, of J-B-H Service and Equipment, Inc., and you were present at the inspection. During the inspection it was observed that a release of unleaded gasoline had occurred from one of the bungs on the underground storage tank. This release appears to be confined to the soils and sand backfill in the immediate vicinity of the tank hole.

The Texas Water Commission is responsible for protecting and maintaining the quality of state waters as well as the protection of public health and safety which may be threatened when the release of gasoline occurs from an underground storage tank system. Section 26.351(b) of the Texas Water Code requires the owner or operator of an underground storage tank system to immediately abate and remove any releases that may occur. The following steps must be followed to insure satisfactory remediation of your site:

1. Excavate the contaminated backfill and overexcavate the walls and floors of the tank pit.

2. Once the soil has been removed, representative samples should be collected, properly preserved, and analyzed for benzene, toluene, ethyl benzene, and xylene (BTEX) and total petroleum hydrocarbon (TPH).

The removed material may be disposed of at a municipal landfill (with the city's concurrence) if the concentration is below 500 ppm BTEX (50,000 ppm TPH). Prior to analyzing collected samples, you are advised to contact the proposed landfill regarding their disposal requirements. If the concentration levels are greater than 500 ppm BTEX (50,000 ppm TPH), the material must be transported accompanied by a completed manifest, to an industrial waste disposal site.

3. Representative samples should be collected from the floor and each wall of each overexcavated tank pit. The collected samples should be properly preserved and analyzed for the applicable constituent. The sampling must demonstrate that any remaining contamination decreases in concentration with an increase in distance from the original source of the release.

   The test results should be conveyed to Ms. Evans, of this office to verify cleanup of the tank pits.

4. If remediation activities determine that the extent of contamination is significantly greater than initially observed or that groundwater has been impacted, you are required to notify Ms. Evans, of this office, immediately.

The following documentation must be provided to the District 4 office within twenty-one days of receipt of this letter.

1. Copies of test results for samples collected from soil removed from the tank pit, and from the floor and walls of each overexcavated tank pit. Also, a site diagram indicating the locations of sample collection points should be provided.

2. A description of how the removed backfill and overexcavated material was handled on-site and ultimately disposed. Copies of receipts/manifests provided to you by the applicable disposal site should be submitted.

3. A description of material used to refill each tank pit.

Should you have any questions or require guidance in this matter, please contact Sierra Evans at 1019 North Duncanville Road, Duncanville, Texas 75116-2201; telephone (214) 298-6171.

Sincerely,

Charles D. Gill
District Manager

SE:hg

cc: Daniel J. McClellan
Head, Enforcement Section
Underground Storage Tank Program

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : UST Technical Support Unit
Attention: Allen Martinez

DATE: 8/2/88

THRU : Brenda Price, UST Coordinator,
Field Operations Division

FROM : Sierra Evans, Environmental Quality Specialist
District 4 - Dunamville

SUBJECT: Inspection of UST Construction Activity

FACILITY Capital Wire & Cable

ADDRESS 910 10th St.

CITY, COUNTY Plano, Collin

UST ID NUMBER 0019699

TYPE ACTIVITY

Installation ✓
Removal ____
Replacement ____
Abandonment ____
Other (specify) ____

DATE OF INSPECTION 8/2/88

SUMMARY OF INSPECTION None.

COMMENTS This priority II case was handled by TWC, District 4. Contamination was cleaned up prior to this new installation.

PERSONNEL PRESENT ON SITE DURING INSPECTION Phil Pringle/Capital Wire & Cable; James Berry/JB-H Service & Equip. Inc; & Sierra Evans TWC

WAS CONSTRUCTION ACTIVITY COMPLIANT WITH 31 TAC 334 ? yes

WAS CONSTRUCTION ACTIVITY COMPLIANT WITH LOCAL REGULATIONS ? yes

WAS A LUST DISCOVERED ? No.

ATTACHMENTS: Construction Checklist.

Signed Sierra Evans Approved ____

CHNICAL STANDARDS
IOLATIONS
___ YES ✓ NO

LUST ✓ YES ___ NO

Texas Water Commission
UST Construction Checklist

DATE INSPECTION 8/2/88
DATE REPORT 8/2/88
INSPECTOR Steve Evans

GENERAL FACILITY & SITE INFORMATION

1. **Type of Activity:** Cable & Wire Manufacturer

2. **Facility Name:** Cable W
Location: 900 Ave. F
City: Plano **Co:** Collin
Telephone: 214-423-6565
UST Fac. No. (if known): 0019699

3. **Owner:** Capital Wire & Cable
Representative: Phil Pringle
Title: Vice President - Engineering
Address: 900 Ave. F 75076
City/St/Zip: Plano, Texas 75074
Telephone: 214-423-6565

4. **Consultant:** Southern Solvents & Waste Manage
Representative: Collette Cyr
Title: General Manager
Address: P.O. Box 5-7847
City/St/Zip: Dallas, TX. 75229
Telephone: 214-869-0417
800-442-3065 (TX. wats)

5. **UST Contractor:** J-B-H Service & Equip.,
Representative: James Berry
Title: President
Address: 2525 Barge Lane
City/St/Zip: Dallas, TX. 75212
Telephone: 214-638-7404
214-263-1619 (metro)

6. **Facility/Site Description:**
Type Facility: Cable & Wire Manufacturer **Facility Status:** Operating
Locale: 900 Ave F, Plano, TX **Prevailing Land Use:** Farm land
Nearby Surface Features (roads, rivers, etc.) 900 Ave F

Adjacent/Nearby Buildings or Structures: railroad & residential area

Geological/Hydrogeological Features: Sandy Clay

7. **Planning Materials:**
Construction Plans: None available
Project Specifications: installed according to Fire Code (1979)
Equipment Operating Instructions: None
As-Built Plans On-Site: N/A
Closure Plan: will send to TWC
Other (specify): none
Copies Filed with TWC: Construction Notification

8. **Remarks:** Final report from consultant will be filed w. TWC.

ABANDONMENT AND REMOVAL INFORMATION

1. **Type of Activity:** ____ Abandonment-in-Place; ✓ Removal
2. **No. of Tanks Involved:** 1. **Written closure plan:** will be mailed to TW
3. **Reason(s) for Removing from Service:** 8,000 gal. tank not tight. Spillage from pipe (≈100 gallons lost).

4. **Tank Information:**	**Tank** 1	**Tank** 2	**Tank** ____	**Tank** ____
Last Product Stored	regular	unleaded		
Last Date Used (est.)	9 yrs	9 yrs.		
Age (if known)	9 yrs.	9 yrs.		
Capacity (gallons)	5 000	8 000		
Material	steel	steel		
Manufacturer	Starcor	Starcor.		
Sgl. or Dbl. Wall	sgl.	sgl.		
Exterior Coating	none	none		
Interior Lining	none	none		
Cath. Protection	yes	yes.		
Condition/Appearance	okay	okay		

Remarks: regular gasoline tank - hole punched in tank during removal. This morning. Unleaded gasoline tank - rusting at seam but not all the way through, and bank broken.

5. **Procedures for Abandonment-in-Place.**

Product Removal/Disposal: ____

Extent of Excavation: ____

Preparation of Piping, Fill Tubes, Tanks, etc. ____

Method(s) of Purging Vapors: ____

Procedures & Materials for Tank Filling: ____

Remarks: ____

6. **Procedures for UST removal.**

x Product Removal/Disposal: Skimmed off water in pit (not groundwater) & placed in 55-gal. drum (sample and disposed of properly). Uncontaminated water pumped down sewer.

Extent of Excavation: 25 ft x 25 ft x 10 ft.

Preparation of Piping, Fill Tubes, etc.: none

Tank Removal/Temp. On-Site Storage: Ambient.

Method(s) of Purging Vapors: no purging

Tank Disposal/Destination: Liberty Iron on Westmoreland St. in Dallas, TX.

Remarks: Backfill allowed to aerate. Sample & chemical analysis will be taken. Clean soil (< 30 ppm BTEX) placed back in soil. Contaminated soil will be removed to Municipal Landfill.

7. **Inspection/Assessment of Tank Pit and Site.**

Leaks/Spills: About 100 gallons lost from overfill. Leak possibly at pipe connection at bungs.

x Removal of free product/contaminated groundwater or soil: Skimmed off water in pit (not groundwater)
See Additional Information

Soil/Water Sampling Procedures: Samples collect from floor and walls using new pairs of gloves, metal scoop (washed with D.I. water between samples) approx. 1 ft into backfill, labeled and packed in ice. Water sample taken not observed.

LUST Reported to UST Enforcement Unit (Name & Date): No report of a LUST. Discovered this was a LUST case on the day of inspection.

Remarks:

8. **Additional Information:** FREE Product
Rain Water/Surface water in tank pit: product skimmed off water and pumped into a new 55 gallon drum. Based on chemical analysis of water sample, drum was disposed of properly.

Free Product in Soil: Soil placed on asphalt and allowed to aerate. Chemical analysis run on backfill. Soil w/ less than 30 ppm BTEX placed back in hole. Contaminated soil to be removed to a Municipal Landfill.

[redacted] [redacted] ST# 92195

Professional Service Industries, Inc.
PTL/National Soil Services Division

August 12, 1988
PSI Project No. 342-85033-5

Capital Wire & Cable Corporation
910 10th Street
P. O. Box 860007
Plano, Texas 75086

Attention: Mr. Phil Pringle

Re: Underground Gasoline and Isopropyl Alcohol Storage Tanks
Plano, Texas

Gentlemen:

Presented herewith are the results of drilling, sampling and laboratory testing performed for the referenced project. The work was performed as requested by Mr. Phil Pringle of Capitol Wire & Cable Corporation.

As requested by Mr. Pringle, the scope of work included drilling soil borings and obtaining soil samples for chemical analysis. The borings were located near one underground isopropyl alcohol storage tank and two underground gasoline storage tanks. The scope of work also included the installation of two inch diameter flush threaded PVC piezometers in three of the borings located near the gasoline storage tanks so that water levels could be monitored. Diagrams showing piezometer construction details are attached.

Based on information provided by Mr. Pringle, it is understood that the isopropyl alcohol tank is approximately a 6000 gallon tank. The tank bottom is located a maximum of ten feet below grade. One of the gasoline tanks is a 4000 gallon tank; the other gasoline tank is an 8000 gallon tank. The gasoline tank bottoms are located a maximum of 12 feet below grade.

Plans showing the approximate boring locations are attached. The borings were advanced using a CME 55 truck mounted drill rig equipped with 3¼ inch I.D. hollow stem augers. Soil and rock samples were obtained using two inch O.D. stainless steel split-barrel samplers (ASTM D 1586).

Drilling and sampling equipment were cleaned with a steam cleaner and potable water before the start of drilling activities at the site and between borings. Sampling equipment was also cleaned between samples using the steam cleaner and potable water.

A Drager tube multi-gas detector with an alcohol 100/a tube was used in the field to screen soil samples obtained from borings B-4, B-5 and B-6 which were located near the isopropyl alcohol tank. The screening was performed by

Professional Service Industries, Inc.
PTL/National Soil Services Division

placing a portion of each sample in a labeled glass jar with a screw on lid. A separate potion of each sample was placed in a labeled laboratory container and packed in ice. After each jar was allowed to sit for at least 30 minutes, the lid was unscrewed and the tip of the Drager tube sliped under the lid and the bellows pump operated according to the manufacturers instructions. The reading obtained was then recorded on the boring log at the corresponding sample depth. Some of the laboratory samples were subsequently tested for isopropyl alcohol.

A photoionization detector (HNU Model PI-101 with a 10.2 eV tip) with a benzene calibration was used to screen soil samples obtained from borings B-7, B-8, B-8A and B-9. The screening was performed by placing a portion of each sample in a labeled glass jar with a screw on lid. A separate portion of each sample was placed in a labled laboratory container and packed in ice. After each jar sample was allowed to sit for at least 30 minutes, the lid was unscrewed and the photoionization detector tip slipped under the lid. The reading in ppm was recorded on the boring log at the corresponding sample depth. Soil exhibiting higher readings were then tested in the laboratory for VOC's.

Water level measurements were performed at completion of drilling and selected intervals thereafter. Boring logs which include soil and rock descriptions, Drager tube readings, photoionization detector readings, water level information, stratifications, visual classifications based on the Unified Soil Classification System and sample types and depths are attached. Keys to descriptive terms and symbols used on the boring logs are also attached.

The stratification of the subsurface materials shown on the boring logs represents the subsurface conditions encountered at the actual boring locations and variations may occur across the site. The lines of demarcation represent the approximate boundary between the soil and/or rock types, but the actual transition may be gradual. It should also be noted that groundwater levels may vary due to seasonal and climate variations, land usage and ground cover.

Chemical tests were performed on selected soil samples. The results of these tests are presented on the attached test data sheets. The data sheets have been previously submitted. The scope of our services was limited to drilling, sampling, testing and reporting the data.

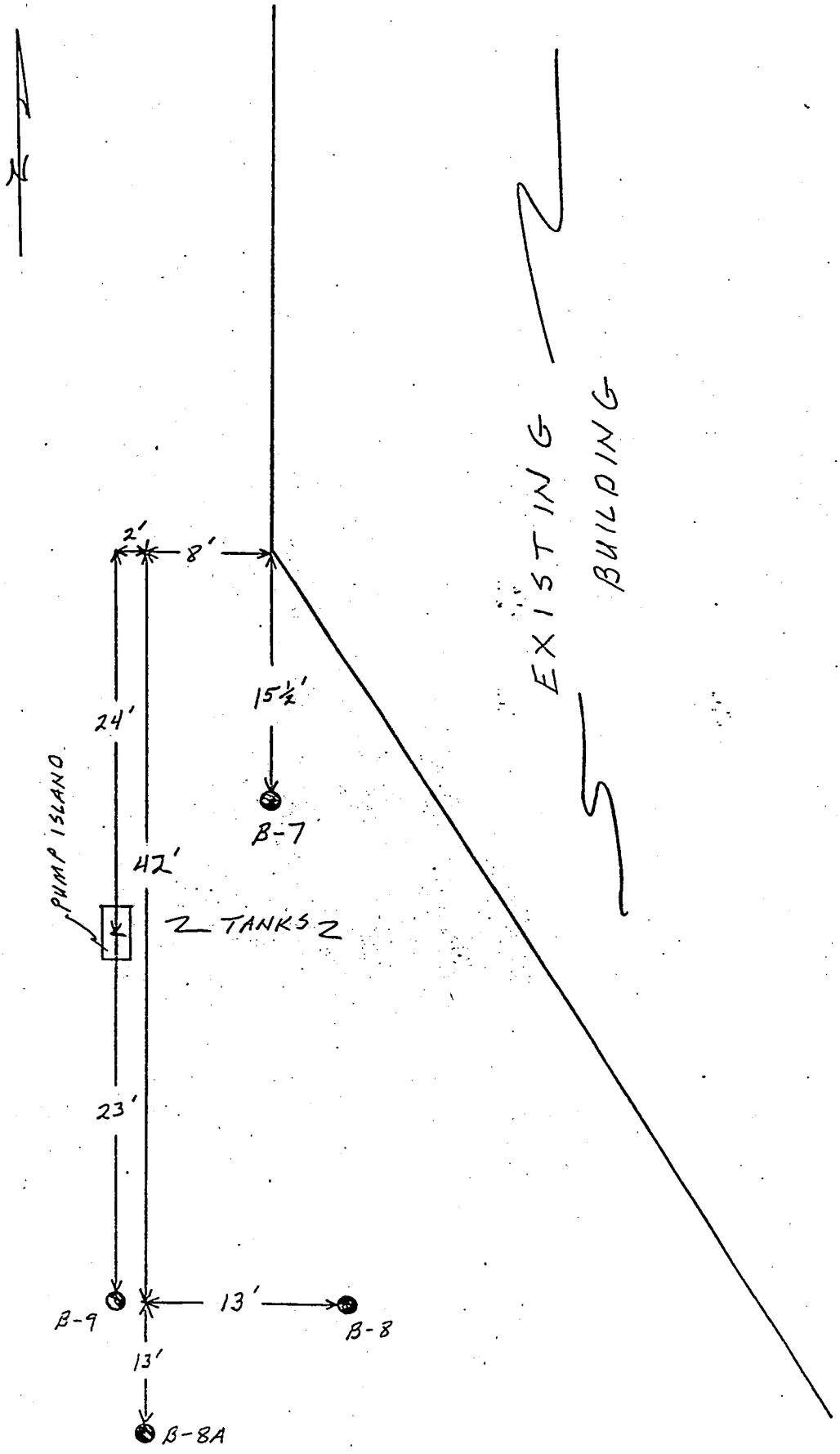
PSI appreciates the opportunity to be of service on this project. If you have any questions concerning this report, please contact our office.

Very truly yours,

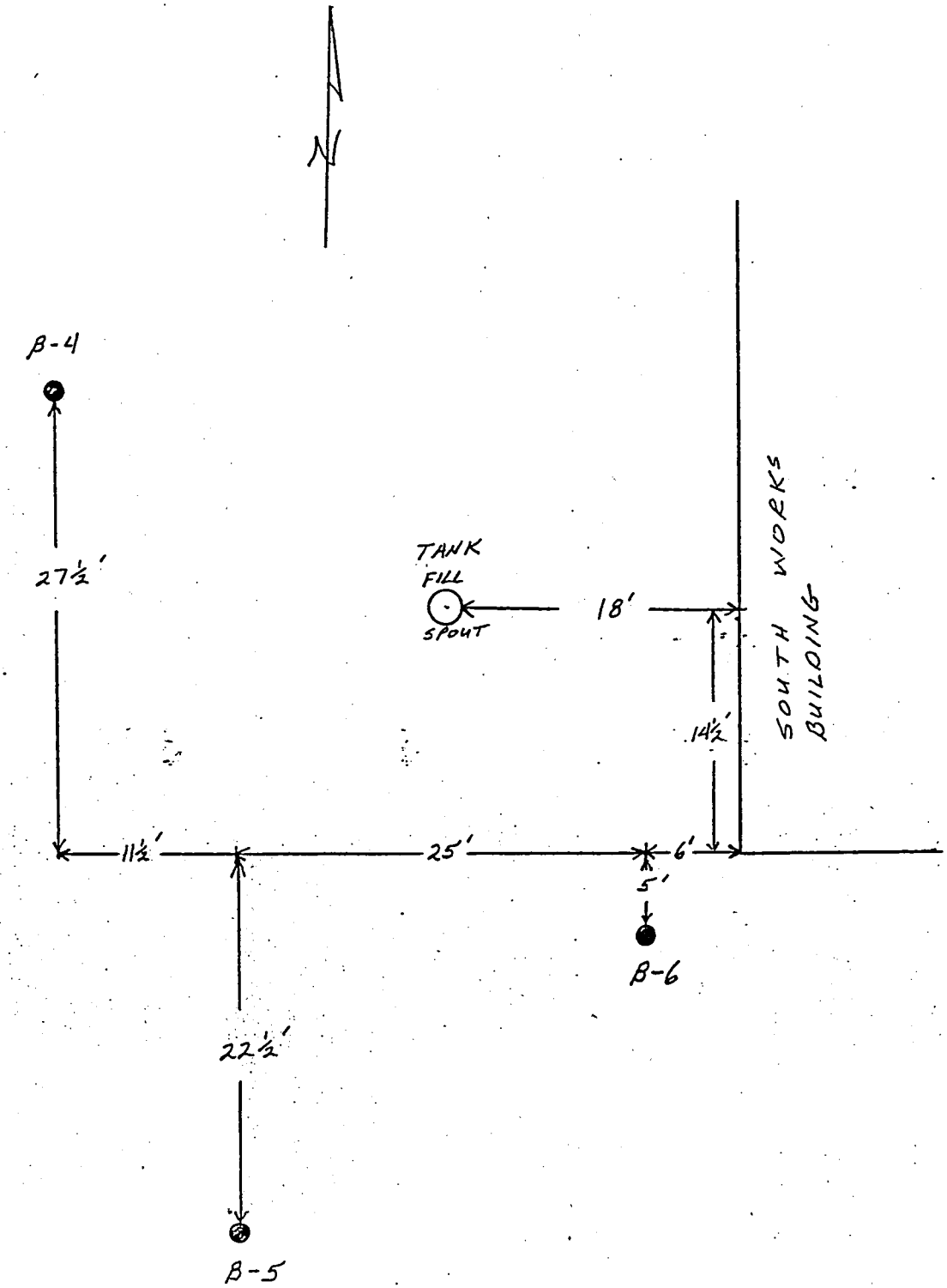
PROFESSIONAL SERVICE INDUSTRIES, INC.

Koi Z. Woodson, P. E.
Senior Division Manager

KZW/tlc



PLAN OF BORINGS
GASOLINE TANKS



PLAN OF BORINGS
ISOPROPYL ALCOHOL TANK

NOT TO SCALE

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-4

PROJECT NO. 342-85033

TYPE OF BORING: Auger

DATE OF BORING: 6/20/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS Draeger Tube Readings (ppm)
		Dark gray, gray & tan silty CLAY w/limestone fragments (FILL) (CL-CH)					N = 19			BDL *
5		Dark gray CLAY (CH)					N = 14			BDL *
10		Gray & tan CLAY w/calcareous nodules (CH)					N = 19			BDL *
15		Tan highly weathered LIMESTONE w/clay seams					N=70@9"			BDL *
		Total Depth of Boring = 15'								* Below Detection Limit
20										
25										
30										
35										

No water present in boring at completion of drilling.
No water present in boring on 6/23/88.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-5

TYPE OF BORING: Auger PROJECT NO. 342-85033 DATE OF BORING: 6/20/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS Draeger Tube Readings (ppm)
	X	Brown & tan silty CLAY w/lime-stone fragments (FILL) (CL)					N = 16			BDL *
5	X	Dark gray CLAY (CH)					N = 13			BDL *
10	X	Tan & gray silty CLAY w/lime-stone seams (CL-CH) Tan highly weathered LIMESTONE w/clay seams					N = 54			BDL *
15	X						N=90@6"			BDL *
		Total Depth of Boring = 14½'								*Below Detection Limit
20										
25										
30										
35										

No water present in boring at completion of drilling.
No water present in boring on 6/23/88.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-6

TYPE OF BORING: Auger PROJECT NO. 342-85033 DATE OF BORING: 6/20/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS Draeger Tube Readings (ppm)
	X	Dark brown, brown & tan silty CLAY w/gravel & limestone fragments (FILL) (CL-CH)					N = 16			BDL *
5	X	Dark gray CLAY (CH)					N = 14			BDL *
10	X	Tan highly weathered LIMESTONE w/clay seams					N = 48			BDL *
	X						N=70@6"			BDL *
15		Total Depth of Boring = 14½'								* Below Detection Limit
20										
25										
30										
35										

No water present in boring at completion of drilling.
No water present in boring on 6/23/88.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-7

TYPE OF BORING: Auger PROJECT NO. 342-85033 DATE OF BORING: 6/21/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS PID Readings (ppm)
		4½" Concrete & 3" Sand					N = 13			15
		Dark gray CLAY w/calcareous nodules (FILL) (CH)								
5		Gray & tan silty sandy CLAY (FILL) (CL)					N =32			7.2
		Tan highly weathered LIMESTONE w/ clay seams					N=74@5½"			5.8
10		Gray shaley LIMESTONE								
15		Total Depth of boring = 13'								
20										
25										
30										
35										

No water present in boring at completion of drilling.
PVC piezometer installed in boring.
No water present in piezometer on 6/23/88.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-8

TYPE OF BORING: Auger

PROJECT NO. 342-85033

DATE OF BORING: 6/21/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS PID Reading (ppm)
	X	5" Concrete Tan SAND (FILL) (SP)					N = 3			4
5		Total Depth of Boring = 3' Encountered auger refusal at 3'. Boring location moved to alternate location as requested by Mr. Phil Pringle of Capitol Wire & Cable Corporation.								
10										
15										
20										
25										
30										
35										

No water present in boring at completion of drilling.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-8A

TYPE OF BORING: Auger PROJECT NO. 342-85033 DATE OF BORING: 6/21/88

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS PID Reading (ppm)
		5" Concrete								
		Dark brown CLAY (FILL) (CH)					N = 11			6
		Gray & tan silty CLAY (CL-CH)					N = 32			9.1
5		Tan highly weathered LIMESTONE w/clay seams								
							N=64@5"			6.9
10							N=69@4½"			4.1
15		Total Depth of Boring = 13½'								
20										
25										
30										
35										

No water present in boring at completion of drilling.
PVC piezometer installed in boring.
No water present in piezometer on 6/23/88.

PROFESSIONAL SERVICE INDUSTRIES, INC.

LOG OF BORING NO. B-9

PROJECT NO. 342-85033

TYPE OF BORING: Auger

DATE OF BORING: 6/21/88

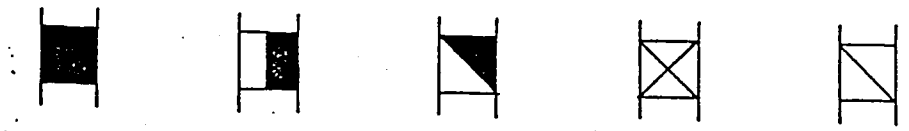
B-9
85033

DEPTH, FT.	SAMPLE	SOIL DESCRIPTION ELEVATION:	LIQUID LIMIT	PLASTICITY INDEX	MOISTURE CONTENT, %	UNIT DRY WT. PCF	UNCONFINED COMPRESSIVE STRENGTH, TSF OR SPT BLOWS/FT.	HAND PENETROMETER RDG./TSF	% PASSING #200 SIEVE	REMARKS PID Reading (ppm)
		5" Concrete								
		Dark brown CLAY (CH)					N = 17			30
5		Tan & gray silty CLAY w/calcareous nodules (CL-CH)					N = 36			20
		Tan highly weathered LIMESTONE w/clay seams & iron stains								
10							N=74@9"			9
		Gray shaley LIMESTONE					N=100@5"			7
15		Total Depth of Boring = 13½'								
20										
25										
30										
35										

No water present in boring at completion of drilling.
PVC piezometer installed in boring.
No water present in piezometer on 6/23/88.

KEY TO SOIL CLASSIFICATIONS

SAMPLE TYPE



Undisturbed | Auger | Pitcher Barrel | Split Spoon | No Recovery

TERMS DESCRIBING CONSISTENCY OR CONDITION

COARSE GRAINED SOILS
(Major portion retained on No. 200 sieve)

Includes (1) clean gravels and sands described as fine, medium or coarse, depending on distribution of grain sizes and (2) silty or clayey gravels and sands. Condition is rated according to relative density, as determined by laboratory tests or estimated from resistance to sampler penetration.

Penetration Resistance Blows/Foot**	Descriptive Term	Relative Density *
0 - 10	Loose	0 to 40%
10 - 30	Medium dense	40 to 70%
30 - 50	Dense	70 to 90%
Over 50	Very dense	90 to 100%

* From tests on undisturbed sand sample
** 140# hammer, 30-inch drop

Relative density is also used to describe condition of low plasticity (P I ≤ 10) fine grained soils such as sandy silts.

FINE GRAINED SOILS
(Major portion passing No. 200 sieve)

Includes (1) inorganic and organic silts and clays, (2) gravelly, sandy, or silty clays, and (3) clayey silts. Consistency is rated according to shearing strength, as indicated by penetrometer readings or by unconfined compression tests for soils with plasticity indices ≧ 10.

Descriptive Term	Compressive Strength Tons/Sq. Ft.
Very soft	less than 0.25
Soft	0.25 to 0.50
Firm	0.50 to 1.00
Stiff	1.00 to 2.00
Very stiff	2.00 to 4.00
Hard	4.00 and higher

Note: Slickensided and fissured clays may have lower unconfined compressive strengths than shown above, because of planes and weakness or shrinkage cracks in the soil. The consistency ratings of such soils are based on penetrometer readings.

TERMS CHARACTERIZING SOIL STRUCTURE

Fissured - containing shrinkage cracks, frequently filled with fine sand or silt; usually more or less vertical

Sensitive - pertaining to cohesive soils that are subject to appreciable loss of strength when remolded

Laminated - composed of thin layers of varying color and texture

Interbedded - composed of alternate layers of different soil types

Calcareous - containing appreciable quantities of calcium carbonate

Well graded - having wide range in grain sizes and substantial amounts of all intermediate particle sizes

Poorly graded - predominately of one grain size, or having a range of sizes with some intermediate size missing

Slickensided - having inclined planes of weakness that are slick and glossy in appearance.

Degree of slickenside development:

Slightly slickensided - slickensides are present at intervals of 1-2 feet and soil does not easily break along these planes.

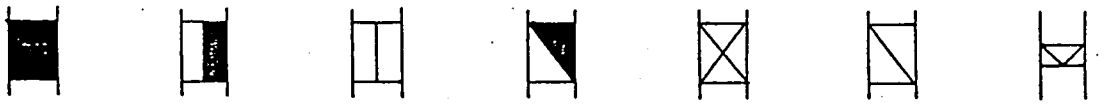
Moderately slickensided - slickensides are spaced at intervals of 1-2 feet and soil breaks easily along these planes.

Extremely slickensided - slickensides are spaced at intervals 4-12 inches, are continuous and interconnected. Soil breaks easily along the slickensides. Resulting size of broken pieces three to six inches.

Intensely slickensided - slickensides are spaced at intervals of less than four inches and are continuous in all directions. Soil breaks down along planes into nodules 0.25 - 2 inch in size.

KEY TO ROCK CLASSIFICATIONS

SAMPLE TYPE



TERMS CHARACTERIZING PHYSICAL PROPERTIES OF ROCK

Bedding Characteristics:

Massive	– occurring in thick beds, free from minor joints and laminations, more than 100 mm. in thickness
Thin to med.	– occurring in relatively thin layers or laminae, 2 mm. to 100 mm. bedding planes
Fissile	– bedding which consists of laminae less than 2 mm. in thickness, splits easily along closely spaced parallel planes
Cross-bedded	– arrangement of laminations of strata transverse or oblique to the main planes of stratification of the strata concerned
Foliated	– the laminated structure resulting from segregation of granular and fine minerals into layers parallel to the schistosity (result of the parallel arrangement of platy and ellipsoidal mineral grains)
Platy	– parallel arrangement of broad or flat minerals (giving a foliation) by sloblike inclusions, by schlieren, or by bands of different mineralogy or texture
Fragmental	– consisting of broken material, particularly that which has been moved from its place of origin

Lithologic Characteristics:

Clayey, Shaly, Calcareous (limy) Siliceous Sandy, Silty, Plastic Seams Carbonaceous	– The lithology is used describing the parent rock such as a shaly limestone or carbonaceous shale

Hardness and Degree of Cementation:

Very soft or plastic	– can be remolded in hand, corresponds in consistency up to very stiff in soils
Soft	– can be scratched with fingernail
Moderately hard	– can be scratched easily with knife; cannot be scratched with fingernail
Hard	– difficult to scratch with knife
Very hard	– cannot be scratched with knife
Poorly cemented or friable	– easily crumbled
Cemented	– bound together by chemically precipitated material occurring in the interstices between allogenic particles of rock – quartz, calcite, dolomite, siderite and iron oxide are common cementing materials

Swelling Properties:

Swelling and Non-Swelling

Slaking Properties:

Non-Slaking

Slakes slowly on exposure

Slakes readily on exposure

Texture:

Dense	– fine-grained aphanitic rocks in which the grain size generally averages less than 0.05 to 0.1 mm.
Fine	– more than 50% by weight smaller than 0.074 mm. in diameter (seen only with a strong hand lens or a microscope)
Medium	– majority of grain sizes between 0.074 mm. and 0.5 mm.
Coarse	– grain sizes range from 0.5 mm. to 1.0 mm. (crystals are visible to the unaided eye)

Structure:

Bedding	– Flat (0° to 15°); Gently dipping (15° to 30°) Steeply dipping (30° to vertical)
Fractures, scattered or open	– broken surface of minerals or rock which does not exhibit cleavage or bedding planes
Fractures, closely spaced	– shows signs of broken minerals but now is cemented
Brecciated (sheared & fragmented)	– rock made up of highly angular coarse fragments – may be sedimentary or formed by crushing or grinding along faults
Joints	– fractures in rock, generally more or less vertical or transverse to bedding, along which no appreciable movement has occurred.
Faulted	– fracture or fracture zone along which there has been displacement of the sides relative to one another parallel to the fracture – the displacement may be a few inches or many miles
Slickensides	– polished and striated (scratched) surface that results from friction along a fault plane

Degree of Weathering:

Unweathered	– rock in its natural state before being exposed to atmospheric agents
Slightly weathered	– noted predominantly by color change with no disintegrated zones
Weathered	– complete color change with zones of slightly decomposed rock
Extremely weathered	– complete color change with consistency, texture, and general appearance approaching soil

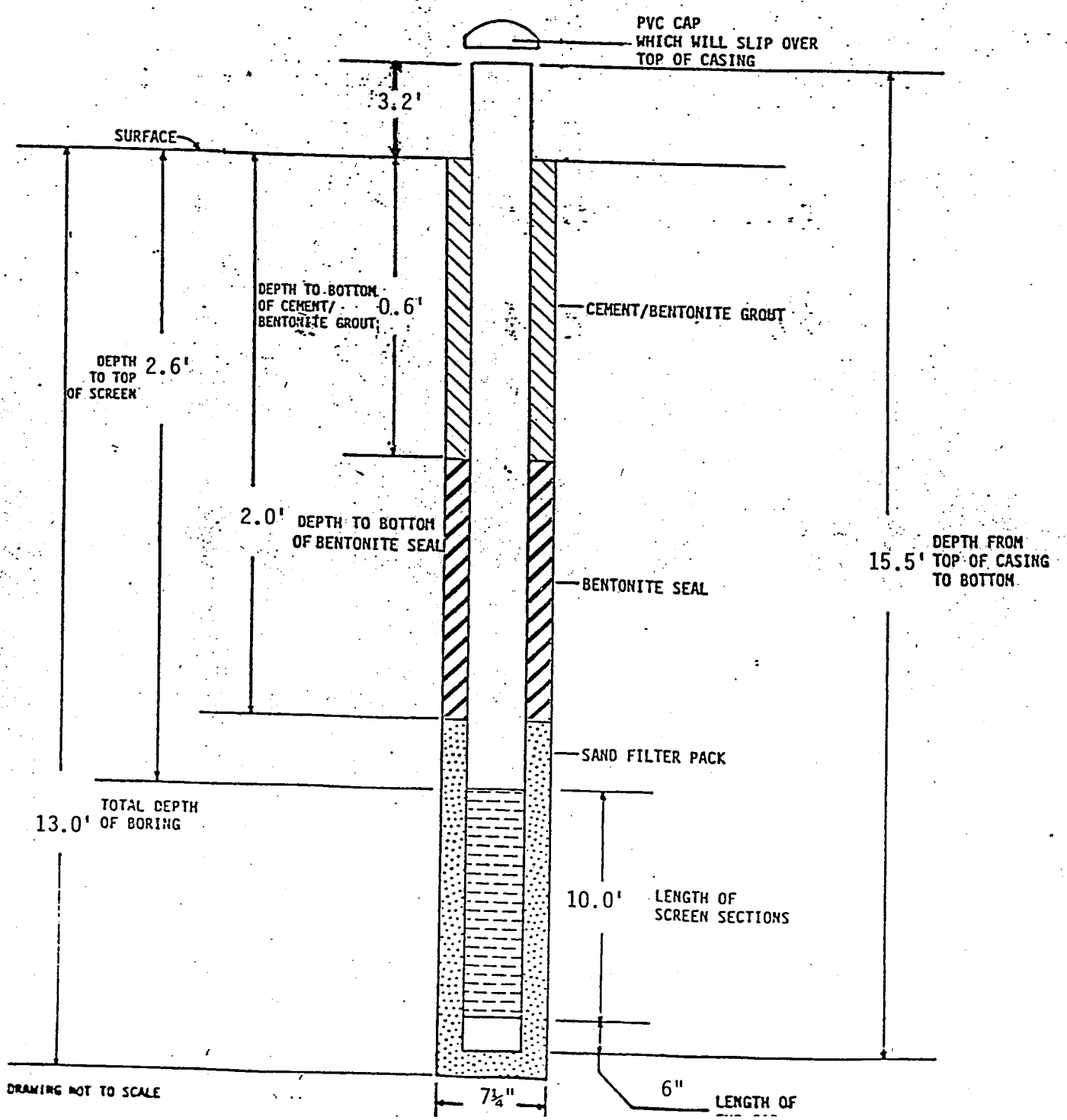
Solution and Void Conditions:

Solid	– contains no voids
Vuggy (pitted)	– cavities in rock
Vesicular	– containing many small cavities
Porous	– containing voids, pores, interstices, or other openings which may or may not interconnect
Cavities	– solutional concavity in limestone caves, the outline of which is determined by a joint or joints – also applied to small hollows in cavernous lava
Cavernous	– containing cavities or caverns, sometimes quite large – most frequent in limestones and dolomites

PROJECT 342-85033

I.D. NO. B-7

PIEZOMETER DATA SHEET



PROJECT 342-85033 I.D. NO. B-8A

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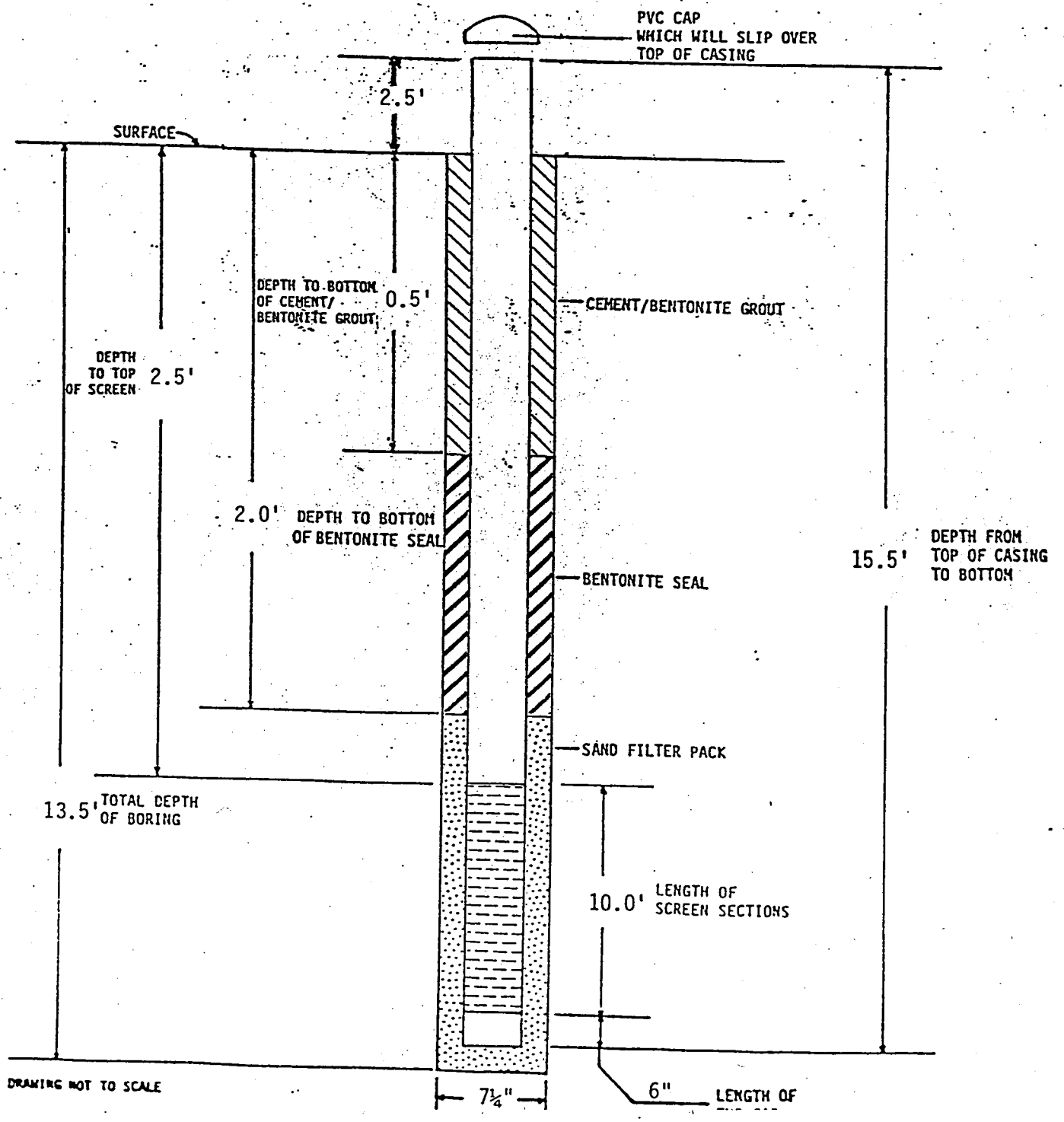

PROJECT 342-85033 I.D. NO. B-9

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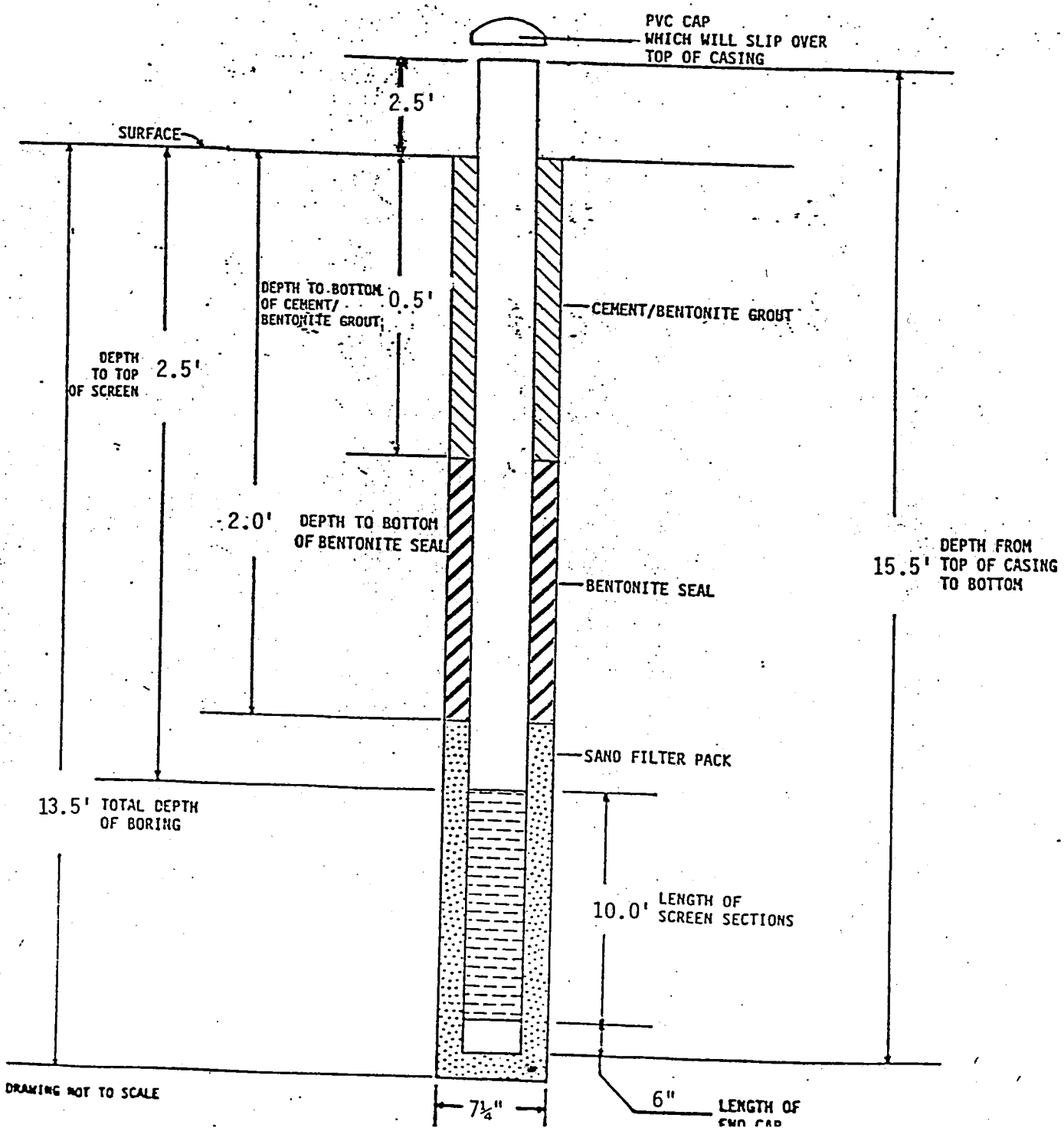

Professional Service Industries

July 11, 1988
PSI Project No. 342-85033-2

Capitol Wire & Cable Corporation
Post Office Box 860007
910 10th Street
Plano, Texas 75086

Attention: Mr. Phil Pringle

Re: Soil Testing
Underground Gasoline Storage Tanks
Capitol Wire & Cable Corporation
Plano, Texas

LABORATORY REPORT

EPA Method 602 Purgeable Aromatics	B-7 0.5'-2'	B-8 3.5'-5'	B-9 3.5'-5'	Detection Limit
Benzene	BDL	BDL	10	1
Chlorobenzene	20	30	82	10
1,2-Dichlorobenzene	BDL	BDL	BDL	10
1,3-Dichlorobenzene	BDL	BDL	BDL	10
1,4-Dichlorobenzene	BDL	BDL	BDL	10
Ethylbenzene	BDL	BDL	BDL	10
Toluene	BDL	BDL	BDL	10
Xylenes	BDL	BDL	BDL	30
MTBE	BDL	BDL	BDL	10
Total Purgeable Aromatics *	BDL	BDL	92	50

All Values Expressed As ppm Unless Otherwise Noted
BDL= Below Detection Limit
* Previously Referred To As Total "VOC'S"

Respectfully Submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

Professional Service Industries, Inc.
PTL/National Soil Services Division

July 11, 1988
PSI PRoject No. 342-85033-3

Capital Wire & Cable Corporation
Post Office Box 860007
910 10th Street
Plano, Texas 75086

Attention: Mr. Phil Pringle

Re: Soil Testing
Underground Isopropyl Alcohol
Storage Tank
Capitol Wire & Cable Corporation
Plano, Texas

LABORATORY REPORT

EPA Method 602

	B-4 8.5' -10'	B-5 8.5' -10'	B-6 8.5' -10'	Detection Limit (ppm)
Isopropyl Alcohol (ppm)	22	BDL	BDL	10

BDL = Below Detection Limit

Respectfully submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

SUBSURFACE INVESTIGATION OF FORMER UNDERGROUND STORAGE TANK FACILITY

Capitol Wire & Cable
910 West 10th Street
Plano, Texas

LUST No. 97300

Prepared for

Engineers and Erectors
910 W. 10th Street
Plano, Texas

Richard E. Kelley

R. David Shiels, P.G.

Michael E. Covert, P.G.
Environmental Consulting
Services

March 15, 1991

SwL Report No. EC90-2-266

Prepared by

Southwestern Laboratories, Inc.
2575 Lone Star Drive
Dallas, Texas 75212

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SUBSURFACE INVESTIGATION
OF FORMER
UNDERGROUND STORAGE TANK FACILITY

LUST No. 97300

CAPITAL WIRE & CABLE
910 WEST 10th STREET
PLANO, TEXAS

1.0 INTRODUCTION

In accordance with our proposal/agreement dated December 5, 1990, Southwestern Laboratories, Inc. (SwL) conducted a subsurface investigation at the above referenced facility.

The purpose of this investigation was to evaluate the subsurface conditions near and around the previously removed UST to determine the vertical and horizontal extent of petroleum hydrocarbons in the soil and groundwater. A site vicinity map is presented in Figure 1.

1.1 Background

The site is occupied by an operating copper wire processing and extruding facility. On August 8, 1990, an 8,000 gallon steel underground storage tank (UST), which contained used oil, was removed by Engineers & Erectors from the inside of the facility. The UST pit was excavated to a depth of 19 to 26 feet. Approximately 195 cubic yards of excavated soil was stockpiled on-site. Based on laboratory analyses from soils collected from the tank pit walls and floor, a release of oil from the tank was confirmed. On November 26, 1990, the Texas Water Commission (TWC) issued a Corrective Action Directive (CAD) letter to Capital Wire & Cable in reference to the used oil UST.

1.2 Scope Of Work

The scope of work for this project consisted of providing environmental consulting services, drilling and laboratory services for the completion of activities that were requested in the TWC CAD letter.

These eight activities are listed as follows:

1 A description of the release, including the cause, the volume lost, and all measures taken to abate and contain it;

2 A determination of the vertical and horizontal extent of subsurface affected soil;

3 A site characterization which provides a description of the local soil, geology, and groundwater conditions;

4 A site map drawn to scale, indicating the location of the entire underground storage tank system and all nearby buried utilities, structures, and roads; location of any excavated areas and the collection points for all soil and water samples;

5 Laboratory reports providing the results of all sample analyses and a description of sample collection and EPA approved analytical procedures; analysis of samples utilized to determine waste classifications and final cleanup levels;

6 An account of the disposition of contaminated soils and water, recovered product, or any associated wastes; copies of signed receipts of wastes transported off-site from the receiving facility as well as any required uniform hazardous waste manifests;

7 A city or county map depicting the facility's location and photographs documenting observable impacts, excavation, stock piled soils, and any on-site treatment activities;

8 Based upon the results of the assessment, a proposal for the completion of site remediation.

2.0 Soil Boring Installation

The subsurface site investigation consisted of the installation of seven (7) soil borings on December 17 and 18, 1990, and on January 25, 1991. Two of the borings (B-1 and B-2) were installed in the parking and storage area outside of the facility building. These borings were drilled using a Mobile B-57 truck-mounted

drilling rig with hollow stem augers and five foot continuous sampling tubes. Five (5) of the borings (B-3, B-4, B-5, B-6 and B-7) were installed inside of the facility building. Because of low overhead clearance inside the building, these borings were drilled using a trailer-mounted Mobile B-24 drilling rig with continuous flight augers. Twenty-four (24) inch long shelby tubes were pushed in front of the augers to obtain undisturbed soil samples. All of the borings were advanced to a depth sufficient to penetrate unweathered limestone. No groundwater was encountered in any of the holes during or immediately after installation. The location of the soil borings in relation to the site are presented in Figure 2.

The augers, shelby tubes and drilling equipment were decontaminated by steam cleaning prior to drilling each soil boring and upon completion of the project.

The seven borings were located to adequately sample soils in the downgradient, upgradient and lateral direction flow from the UST pit based on surface topography and drainage.

Soil cores and selected cuttings were examined and described on the basis of lithology, color, relative moisture content and odor. Soil samples were screened on-site for volatile organic hydrocarbons with a photoionization detector (PID).

Soil boring B-1 was located in the paved parking and storage area a distance of 21 feet north of the building wall in a north-northwest direction from the pit. Clay, varying in color from brown to yellowish gray to olive was encountered from just beneath the concrete to a depth of nine feet. This was underlain by a weathered yellow gray limestone to a depth of 13.5 feet. Unweathered bluish gray limestone was encountered from 13.5 feet to total depth at 15 feet. No PID readings were recorded from boring samples or drill cuttings in the boring. The soil did, however, have a moderate hydrocarbon odor from just under the concrete to 3.5 feet was noted, and a weak hydrocarbon odor from 3.5 feet to 8.5 feet. No evidence of soil staining was present.

Soil boring B-2 was located in the paved parking and storage area 10 feet north of the building wall and 36 feet east of soil boring B-1. One foot of yellowish brown sand fill was encountered immediately below the slab. Clay varying in color from brown, to yellowish

gray, to olive was encountered from 1 foot to 8.5 feet in depth. This clay was underlain by weathered yellow-gray limestone from 8.5 feet to 11 feet. Unweathered, bluish-gray limestone was encountered from 11 feet to 15 feet. No PID readings were recorded in the boring. The soil had a weak to moderate hydrocarbon odor from just beneath the concrete to a depth of 7.5 feet. The odor was somewhat stronger from 7.5 feet to the top of the weathered limestone at 8.5 feet. No odor was observed in the limestone interval. No evidence of soil staining was present.

Soil boring B-3 was located inside the rodmill building on the facility site. The boring was located four feet south of the southwestern corner of the former used oil UST pit. A thin layer of yellowish-brown sand fill material was encountered just below the slab. Clay varying in color from brown, to yellowish grey, to olive was encountered from 0.7 feet to 12.5 feet. This clay was underlain by weathered yellow-grey limestone from 12.5 feet to 14.5 feet. Unweathered, bluish-gray limestone was encountered from 14.5 feet to a total depth of 15 feet. No PID readings were recorded anywhere in the boring. A very weak hydrocarbon odor was observed in the clay from 8.0 feet to 12.5 feet, just above the weathered limestone interval. No odor was observed in the limestone interval. No evidence of soil staining was present.

Soil boring B-4 was located 19 feet due east of soil boring B-3. A thin layer of yellowish-brown sand fill material was encountered just below the slab. Clay, varying in color from brown to yellowish gray was encountered from 0.7 feet to 11.5 feet. The clay was underlain by weathered yellowish gray limestone from 11.5 feet to 14.8 feet. Unweathered bluish gray limestone was encountered from 14.8 feet to a total depth of 15 feet. No PID readings were recorded in the boring. A moderate hydrocarbon odor was observed in one foot of clay from 10.5 feet to 11.5 feet, just above the weathered limestone interval. No odor was encountered in the limestone. No evidence of soil staining was present.

Soil boring B-5 was located 30 feet due east of the southeast corner of the former used oil UST pit, and 11 feet west of the west wall of the former pit for the cooling water UST. A thin layer of yellowish-brown sand fill material was encountered just below the slab. Clay, varying in color from brown to yellowish gray, was

encountered from 0.7 feet to 12.0 feet. The clay was underlain by weathered yellowish gray limestone from 11.5 feet to a total depth of 15.0 feet. No PID readings were recorded in the boring. No hydrocarbon odors were observed in the boring. No evidence of soil staining was present.

Soil boring B-6 was located 18 feet south and 7 feet east of B-3. Dusky brown clay with gray mottling was encountered from just beneath the concrete to a depth of 9.5 feet. This clay was underlain by a yellowish gray calcareous clay to a depth of 12 feet. A very weak hydrocarbon odor was observed in this interval. Yellowish gray weathered dry limestone was encountered from 12 feet to 15 feet. No hydrocarbon odors were observed in this interval. Unweathered bluish gray limestone was encountered from 15 feet to a total depth of 16 feet. No odors were observed in this interval. No PID readings were recorded in the boring. No evidence of soil staining was present.

Soil boring B-7 was located 18 feet south and 25 feet west of B-3. Dusky brown clay with gray mottling was encountered from just beneath the concrete to a depth of 7.5 feet. This clay was underlain by a dusky yellow gravelly clay to a depth of 9 feet. A yellowish gray calcareous clay was encountered from 9 feet to 11.5 feet. A very weak hydrocarbon odor was observed in this interval. Yellowish gray weathered dry limestone was encountered from 11.5 feet to 14 feet. No hydrocarbon odors were observed in this interval. Unweathered bluish gray limestone was encountered from 14 feet to a total depth of 14.5 feet. No odors were observed in this interval. No PID readings were recorded in the boring. No evidence of soil staining was present.

2.1 Soil Sampling

Soil samples were collected at the interval of the strongest hydrocarbon odor, or immediately above the limestone interval where hydrocarbons, if present, are most likely to accumulate. Soil samples were also collected at or near the bottom of each boring. Sample depths are presented as follows:

TABLE I
SUMMARY OF SAMPLE DEPTHS

Soil Boring	Sample Depth, (ft)
B-1	3.0 - 3.5 14.5 - 15.0
B-2	8.0 - 8.5 10.5 - 11.0
B-3	9.0 - 10.0 14.5 - 15.0
B-4	11.0 - 11.5 14.5 - 15.0
B-5	14.5 - 15.0
B-6	11.5 - 12.0 15.5 - 16.0
B-7	11.0 - 11.5 14.0 - 14.5

Each soil sample was placed in a sanitized glass jar and stored in a cooler with ice for transport to SwL's analytical laboratory along with a completed chain-of-custody form.

3.0 Monitor Well Installation

Although no water was observed in any of the borings 18 hours after installation, on December 18, 1990, Mr. Paul Lindsey of Engineers and Erectors requested that SwL install three monitor wells in soil borings B-1, B-2 and B-3.

Each monitor well was constructed of 4 inch diameter. Schedule 40, threaded, flush joint PVC pipe with 10 feet of 0.010 inch machine-slotted well screen placed in the bottom of each boring. Blank riser pipe was fitted above the well screen to the surface. A sand pack of graded 20/40 silica sand was installed in each boring and extended from the bottom of the well to two feet above the top of the well screen. The sand pack was sealed with a minimum of 12 inches of hydrated bentonite pellets followed by a grout mixture consisting of a 12:1 Portland Cement to bentonite ratio that was placed from the top of the bentonite seal to the surface. The

monitor wells were completed with flush mount well covers. Monitor well construction details are presented on the Soil Boring Logs in Appendix A.

At the time of this report, no water was observed in the three (3) monitor wells, therefore no well development has taken place.

TABLE II
SUMMARY OF MONITOR WELL COMPLETION DETAILS AND ELEVATION SURVEY

Well No.	Well Screen Interval (ft.)	Sand Pack Interval (ft.)	Riser Interval (ft.)
MW-1	4.5 - 14.5	2.0 - 14.5	0.5 - 4.5
MW-2	4.0 - 14.0	2.0 - 14.0	0.5 - 4.0
MW-3	4.5 - 14.5	2.0 - 14.5	0.5 - 4.0

3.1 Groundwater Sampling

Since the three monitor wells did not contain groundwater, no groundwater sampling has taken place.

4.0 RESULTS

4.1 Site Geology and Hydrogeology

The facility is located on the outcrop of the Cretaceous aged Austin Chalk Formation. The Austin Chalk consists of massive chalk beds with calcareous clay interbeds. Although the Austin Chalk is typically considered an aquitard, perched groundwater often occurs in alluvial silty and gravelly clays immediately above the weathered bedrock. Typical hydraulic conductivities of the weathered Austin Chalk range from approximately 10^{-4} to 10^{-5} cm/sec.

Based on the soil boring descriptions presented in Appendix A, the geology at the site may be divided into three (3) hydrostratigraphic units as follows:

Stratum I:	**CLAY**, with occasional gravel. Dusky brown to yellowish gray, slightly moist. Thickness ranges from 7.5 to 12 feet. Strongest occurrence of hydrocarbons detected at the base of this formation. (unsaturated)
Stratum II:	**LIMESTONE**, weathered, yellow-gray, dry. Average depth to top of limestone, 8.7 ft. outside of building and 12.0 ft. inside of building. (unsaturated)
Stratum III:	**LIMESTONE**, unweathered, bluish-gray, dry. Average depth to top of gray limestone, 12.3 ft. outside of building and 14.8 ft. inside of building. (confining layer)

4.2 Water Well Search

Agency International Consultants of Austin, Texas was contracted to perform a water well search for wells within a one half mile radius of the site. No known water wells were found within this area. A copy of the water well search is included in Appendix C.

4.3 Laboratory Analyses

The analytical program consisted of analyzing 13 soil samples for Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) and 13 soil samples for Total Petroleum Hydrocarbons (TPH). At the request of Mr. Lindsay two (2) composite soil samples of cuttings were analyzed for BTEX and TPH, as well as Toxicity Characteristic Leaching Procedure (TCLP) Chromium and TCLP Lead. Two (2) stockpile soil samples (SS-1 and SS-2) were collected for the purpose of characterizing the stockpile soils. The EPA-approved methods that were used are as follows:

Analysis	Test Method
BTEX	SW 846 #8020
TPH	600/4-79 #418.1
TCLP Chromium	SW 846 #7190
TCLP Lead	SW 846 #7420

Total BTEX and TPH, and TCLP Chromium and Lead are summarized in Table III below.

TABLE III
BTEX and TPH CONCENTRATIONS

Sample	BTEX (mg/kg)	TPH (mg/kg)
B-1/ 3.0 - 3.5	<0.02	27
B-1/ 14.5 - 15.0	<0.02	33
B-2/ 8.0 - 8.5	<0.02	25
B-2/ 10.5 - 11.0	<0.02	14
B-3/ 9.0 - 10.0	<0.02	19
B-3/ 14.5 - 15.0	<0.02	1,100
B-4/ 11.0 - 11.5	<0.02	160
B-4/ 14.5 - 15.0	<0.02	9
B-5/ 14.5 - 15.0	<0.02	190
B-6/ 11.5 - 12.0	<0.02	32
B-6/ 15.5 - 16.0	<0.02	<5
B-7/ 11.0 - 11.5	<0.02	<5
B-7/ 14.0 - 14.5	<0.02	13
B-1/B-2 Cuttings	<0.02	40
B-3/B-4/B-5 Cuttings	<0.02	47
SS-1	<0.02	870
SS-2	<0.02	190

METALS CONCENTRATION

Sample	TCLP Chrome	TCLP Lead
B-1/B-2 Cuttings	0.09	<0.10
B-3/B-4/B-5 Cuttings	<0.05	<0.10
SS-1	<0.05	<0.10
SS-2	<0.05	<0.10

Total BTEX concentrations in the soil samples were non-detectable (<0.02 mg/kg) in all borings. TPH concentrations in the soil samples ranged from 9 mg/kg in Boring B-4 to 1,100 mg/kg in Boring B-3. Borings B-3, B-4, and B-5 revealed TPH concentrations in excess of the TWC remediation guideline of 100 mg/kg. A maximum TPH level of 1,100 mg/kg was recorded in soil from boring B-3.

4.4 Distribution of Hydrocarbons in the Subsurface

The distribution of hydrocarbons in the subsurface may be determined on the basis of laboratory test results, olfactory evidence, and by the occurrence of organic hydrocarbons as determined in the field by OVM meter

readings. A TPH contour map (Figure 3) shows the horizontal distribution of petroleum hydrocarbons in the subsurface soil as defined by laboratory results. Data shown on this figure which is not from the borings installed by SwL was supplied by the Client.

The affected vertical interval occurs between the depths of 1 and 12 feet (average thickness is 5.0 feet), which is coincident with the dusky brown clay layer within Stratum II. The overall shape of the affected area corresponds to the shape of a shallow channel which appears when a contour map is constructed on the top of the weathered tan limestone (Figure 4).

Olfactory and TPH results suggest that hydrocarbons have migrated beyond the limits of the used oil UST excavation pit. As illustrated in Figure 3, the borings installed on site to date have determined the extent of affected soils with TPH levels above TWC guidelines. The areas affected by petroleum hydrocarbons extend to the southwest, or in an apparent downgradient direction from the potential source areas. An affected area also appears to extend to the east, toward the excavation pit for the cooling water UST. The approximate dimensions of the affected soils are 90 feet long by 25 feet wide and 12 feet thick. The affected soils appear to be limited to the area underneath the rodmill building.

Groundwater was not found to be present in the vicinity of the affected soils.

4.5 Disposition of Stockpiled Soils

The excavated soils removed from the tank pit were temporarily stockpiled on site approximately 250 feet northwest of the tank pit. Approximately 200 cubic yards of excavated soils were placed on and covered by polyethylene sheeting to prevent affected soils from washing away. Based on laboratory analyses provided in Section 4.3 of this report, a Generator's Special Waste Profile Sheet was executed and submitted to Waste Management of North America. After review and approval, the affectred soils were transported and disposed at Waste Management's DFW landfill in Lewisville, Texas. A copy of the waste profile sheet is included in Appendix D.

5.0 CONCLUSIONS

The following is a list of conclusions pertaining to the Capitol Wire & Cable site:

- Seven (7) soil borings were installed to determine the horizontal and vertical extent of affected soils and groundwater. These borings have defined the horizontal and vertical extent of affected soils.

- Three (3) borings were converted to groundwater monitor wells. However, no groundwater was encountered upon well installation.

- Total BTEX concentrations, determined from the soil boring samples, were at or below laboratory detection limits of 0.02 mg/kg. Three (3) borings (B-3, B-4 and B-5) indicated TPH concentrations above the general TWC remediation guideline of 100 mg/kg.

- The dimensions of the affected area with TPH levels above TWC guideline are 90 feet by 25 feet by 12 feet. This yields an in-place soil volume of 1,000 cubic yards, or an excavated volume of 1,400 cubic yards. The area of affected soils is located underneath an active rodmill building on the site.

- Soil sample analyses with elevated (>100 mg/kg) TPH levels from borings installed to date indicate that all affected soils are located underneath an existing building on the site.

6.0 RECOMMENDATIONS

Based on the conclusions outlined above, SwL recommends the following:

- Capitol Wire & Cable should submit a copy of this report to the Texas Water Commission (TWC) at the address below:

  Texas Water Commission
  District 4
  1019 N. Duncanville Road
  Duncanville, Texas 75116
  (214) 298-6171

  Attention: Mr. Dixon Bunt

- Because the extent of affected soil that is above TWC remediation guidelines appears to be confined to an area which is underneath the existing rodmill building on the site, an appropriate remediation proposal may be to leave the soil in place.

7.0 LIMITATIONS AND REPRODUCTIONS

SwL's environmental site assessment was performed in accordance with generally accepted practices of the profession undertaking similar studies at the same time and in the same geographical area, and SwL observed that degree of care and skill generally exercised by the profession under similar circumstances and conditions. SwL's observations, findings, and opinions must not be considered as scientific certainties but as only opinions based on our professional judgment concerning the significance of the limited data gathered during the course of the site assessment. Specifically, SwL does not and cannot represent that the site contains no hazardous or toxic materials, products, or other latent conditions beyond that observed by SwL during its site assessment.

This study and report has been prepared on behalf of and for the exclusive use of Engineers and Erectors, solely for use in an environmental evaluation of this site. This report and the findings contained herein shall not, in whole or in part, be disseminated or conveyed to any other party, nor used by any other party in whole or in part, without the written consent of SwL. However, SwL acknowledges and agrees that the report may be conveyed to the Lender, Buyer, and Title Insurer associated with the proximate sale of the Site by our Client.

SITE PLAN

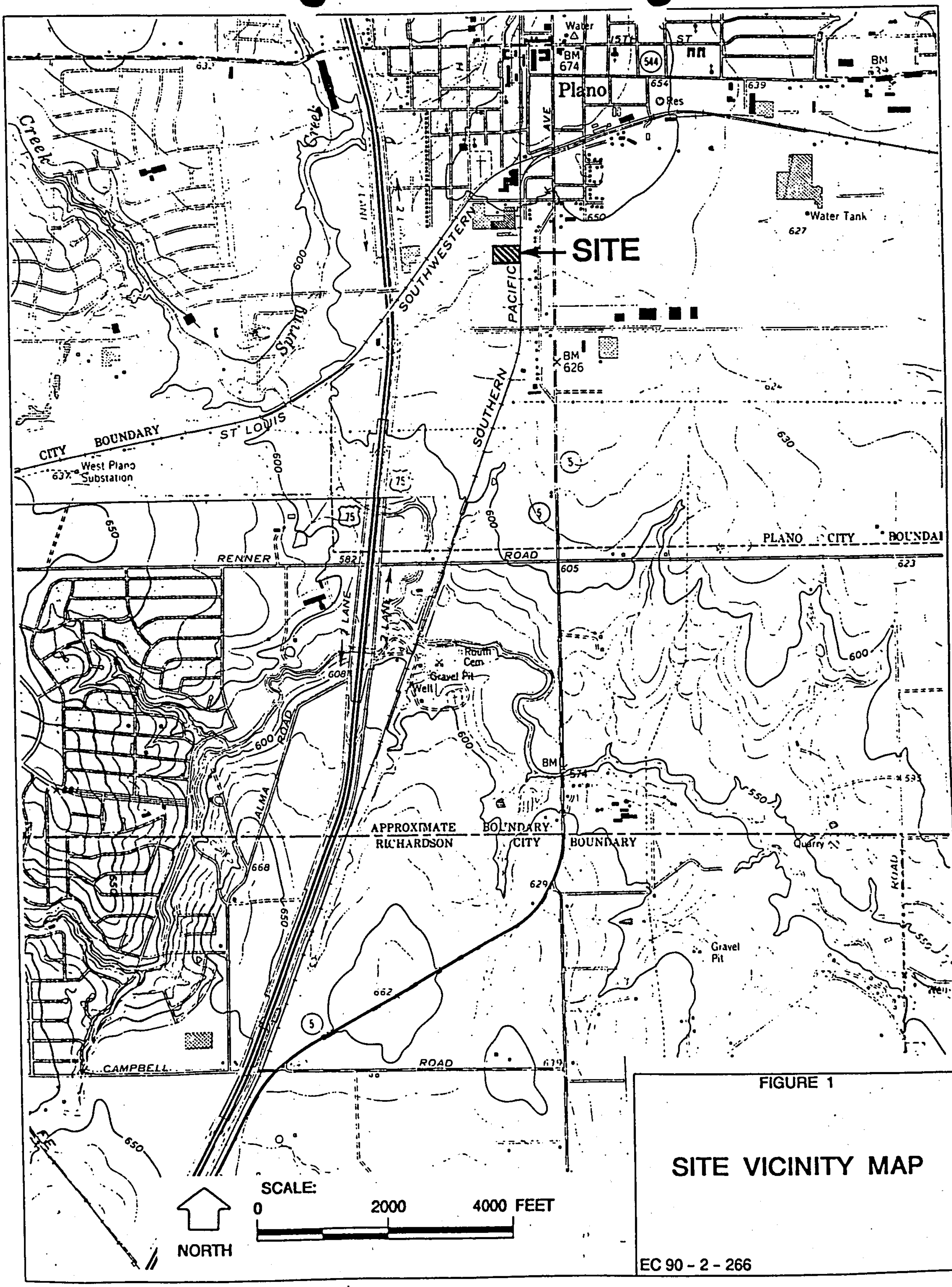


FIGURE 1

SITE VICINITY MAP

EC 90 - 2 - 266

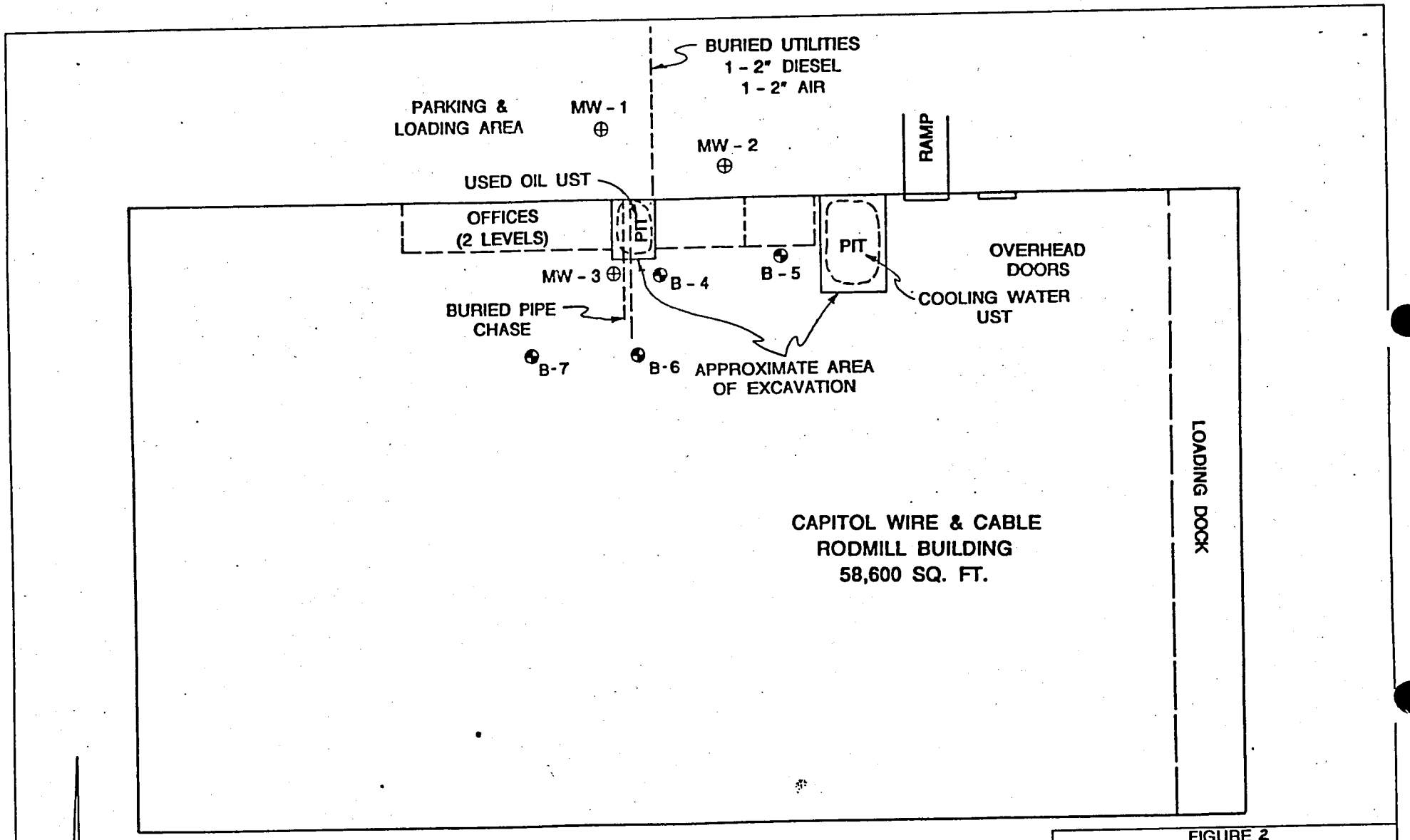


FIGURE 2

MONITOR WELL & BORING LOCATION DIAGRAM

CAPITOL WIRE & CABLE
PLANO, TEXAS

EC 90 - 2 - 266

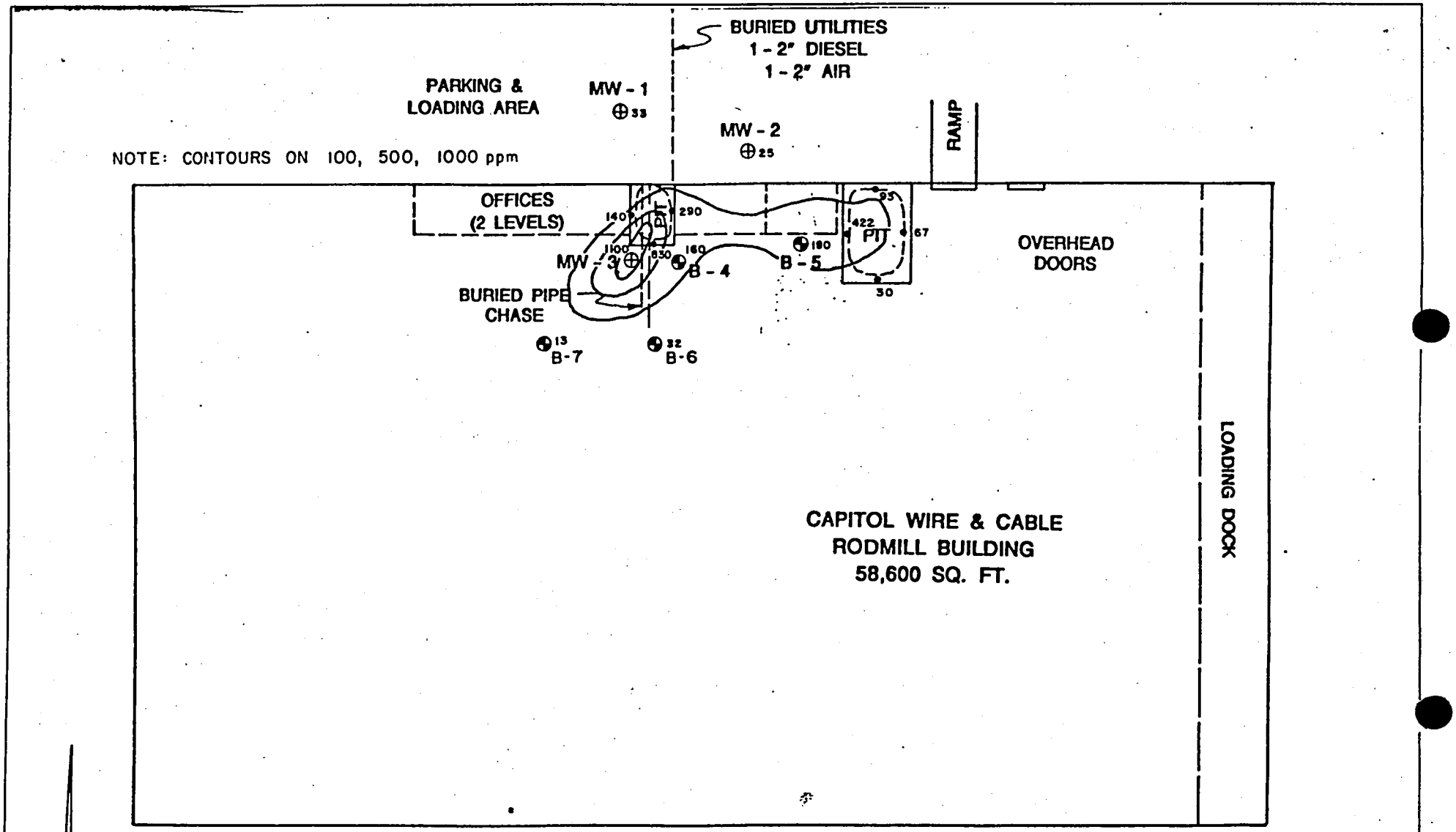


FIGURE 3

TPH CONCENTRATION IN SOIL

CAPITOL WIRE & CABLE
PLANO, TEXAS

EC 90 - 2 - 266 2/25/91

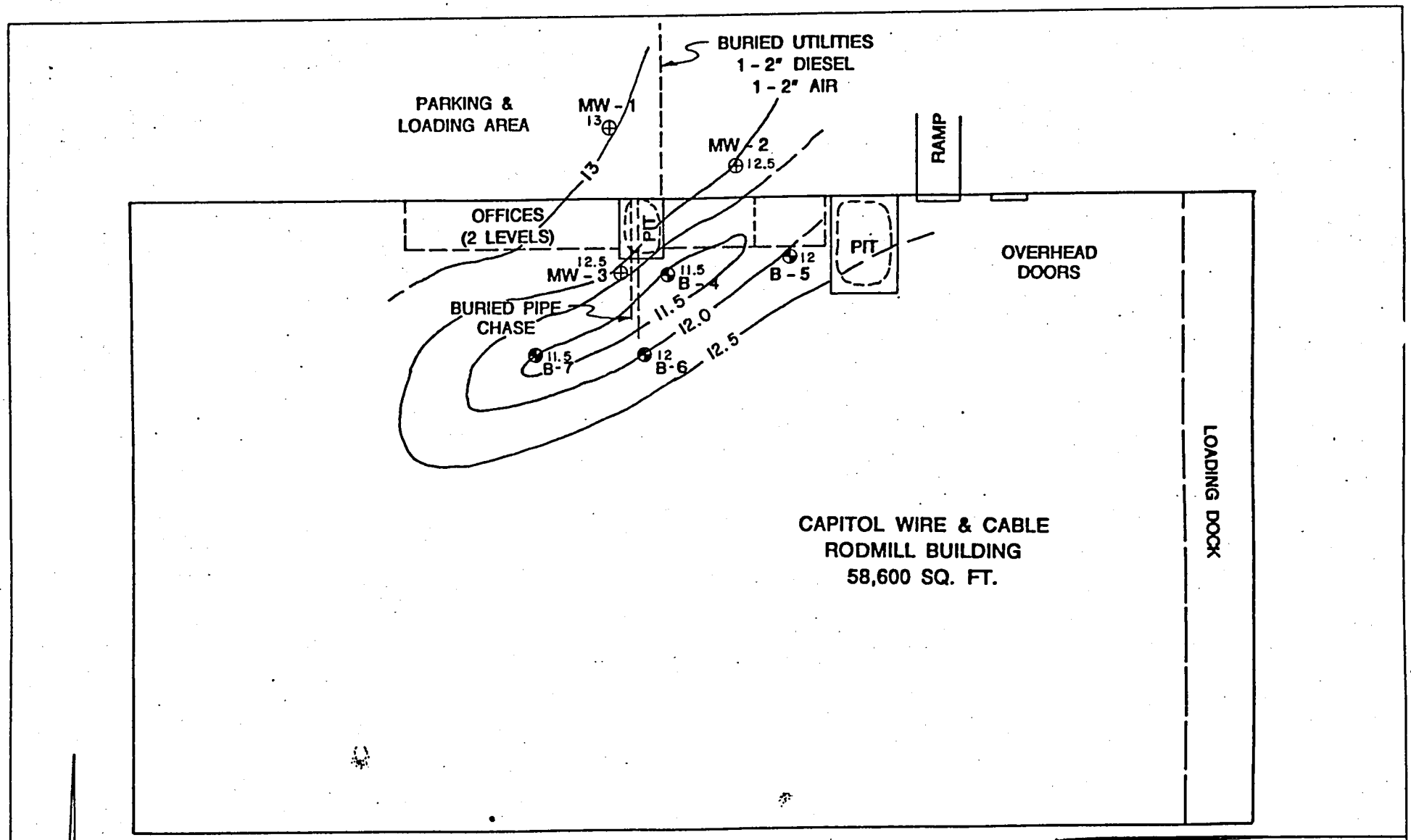


FIGURE 4

DEPTH TO WEATHERED TAN LIMESTONE

CAPITOL WIRE & CABLE
PLANO, TEXAS

EC 90 - 2 - 266

APPENDIX A

BORING/MONITOR WELL

BORING/WELL NUMBER: MW-1
PROJECT: Engineers & Erectors, ESI OWNER: Capitol Wire & Cable
LOCATION: 900 Ave. F, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 15.0' WATER LEVEL: INITIAL Dry 24 HRS Dry
SURFACE ELEVATION:
BORE HOLE DIAMETER 7¼"
SCREEN: DIA. 4" LENGTH 10' SLOT SIZE 0.01"
CASING: DIA. 4" LENGTH 4' TYPE PVC
DRILLING COMPANY: SwL DRILLING METHOD: H.S.A.
DRILLER: Terry Barritt GEOLOGIST: J. Spriggs
DATE DRILLED 12/17/90

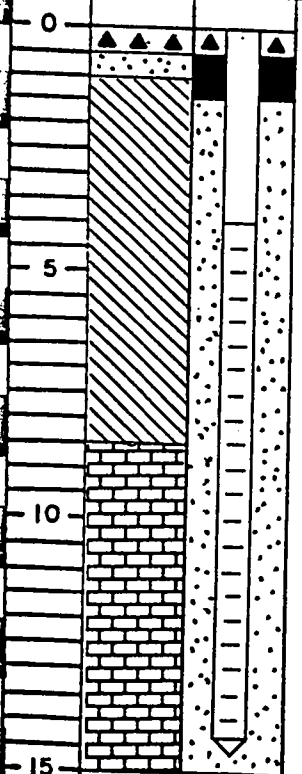
SITE MAP

DEPTH (FEET)	GRAPHIC LOG	WELL CONSTRUCTION	HNU	CORE	CUTTINGS	GEOTECHNICAL	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0			0				0.0'-5.0'	0.0-0.6"	CONCRETE
			0					0.6-3.5'	Dusky brown CLAY with greenish gray mottling, moist, moderate hydrocarbon odor
			0						
			0						
			0					3.5-8.5'	Yellowish gray, gravelly CLAY, moist, weak odor
5			0				5.0-10.0'		
			0						
			0						
			0						
			0					8.5-9.0'	Pale olive, calcareous CLAY, with dark yellowish orange mottling, dry, no odor
			0					9.0-13.5'	Yellow gray LIMESTONE, dry, no odor
10			0				10.0-15.0'		
			0						
			0						
			0						
			0					13.5-15.0'	Bluish gray LIMESTONE, dry, no odor
15									
20									
25									

BORING/MONITOR WELL L[illegible]

BORING/WELL NUMBER: MW-2
PROJECT: Engineers & Erectors, Inc. OWNER: Capitol Wire & Cable
LOCATION: 900 Ave. F, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 15.0' WATER LEVEL: INITIAL Dry 24 HRS Dry
SURFACE ELEVATION:
BORE HOLE DIAMETER 7¼"
SCREEN: DIA. 4" LENGTH 10' SLOT SIZE 0.01"
CASING: DIA. 4" LENGTH 3.5' TYPE PVC
DRILLING COMPANY: SwL DRILLING METHOD: H.S.A.
DRILLER: Terry Barritt GEOLOGIST: J. Spriggs
DATE DRILLED 12/17/90

SITE MAP

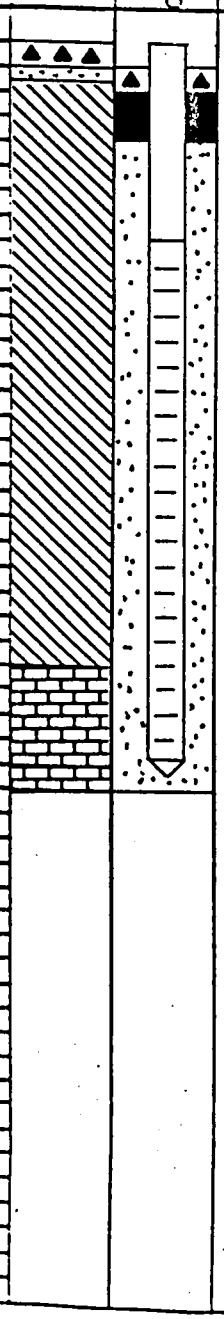


DEPTH (FEET)	HNU	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0	0	0.0-0.5'	0.0-0.5'	CONCRETE
	0	0.5-5.0'	0.5-1.0'	Moderately yellowish brown SAND, fine grained, slightly moist, weak to moderate hydrocarbon odor
	0		1.0-1.5'	Dusky brown CLAY, slightly moist, weak to moderate hydrocarbon odor
	0		1.5-7.5'	Yellowish gray gravelly CLAY, slightly moist, weak to moderate odor
5	0	5.0-8.5'		
	0			
	0			
	0		7.5-8.0'	Dusky brown CLAY, with greenish gray mottling, slightly moist, moderate to strong odor
	0	8.5-10.0'	8.0-8.5'	Dusky brown CLAY, slightly moist, moderate to strong odor
10	0	10.0-15.0'	8.5-11.0'	Yellow gray LIMESTONE, dry, no odor
	0		11.0-15.0'	Bluish gray, LIMESTONE, dry, no odor
	0			
	0			
	0			
15	0			

BORING/MONITOR WELL

BORING/WELL NUMBER: MW-3
PROJECT: Engineers & Erectors, ES OWNER: Capitol Wire & Cable
LOCATION: 900 Ave. F, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 15.0' WATER LEVEL: INITIAL Dry 24 HRS Dry
SURFACE ELEVATION:
BORE HOLE DIAMETER 7¼"
SCREEN: DIA. 4" LENGTH 10" SLOT SIZE 0.0"
CASING: DIA. 4" LENGTH 4" TYPE PVC
DRILLING COMPANY: SwL DRILLING METHOD: H.S.A.
DRILLER: Robert Rowan GEOLOGIST: J. Spriggs
DATE DRILLED 12/17/90

SITE MAP



DEPTH (FEET)	HNU	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0	0	0.0-0.5'	0.0-0.5	CONCRETE
	0	0.5-1.0'	0.5-0.7	Dark yellowish orange fine backfill SAND, slightly moist, no odor
	0	1.0-1.5'		
	0	1.5-2.0'	0.7-6.0'	dusky brown CLAY with light gray small calcareous nodules, slightly moist, no odor
	0	2.0-3.0'		
	0	3.5-4.0'		
	0	4.0-5.0'		
5	0	5.0-7.0'		
	0		6.0-8.0'	Yellowish gray CLAY, with dusky brown CLAY nodules, and dark yellowish orange limestone nodules, slightly moist, no odor
	0	7.0-8.0'		
	0		8.0-10.0'	Yellowish gray gravelly CLAY, with dusky brown clay nodules, slightly moist, very weak hydrocarbon odor
	0	9.0-10.0'		
10	0		10.0-12.5'	Yellowish gray calcareous CLAY, slightly moist, very weak odor
	0			
	0	12.0-12.5'		
	0		12.5-14.5'	Yellowish gray LIMESTONE, dry, no odor
	0			
	0	14.5-15.0'	14.5-15.0'	Bluish gray LIMESTONE, dry, no odor
15				
20				
25				

BORING/MONITOR WELL

BORING/WELL NUMBER: B-4
PROJECT: Engineers & Erectors, ES OWNER: Capitol Wire & Cable
LOCATION: 900 Ave. F, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 15' WATER LEVEL: INITIAL Dry 24 HRS
SURFACE ELEVATION:
BORE HOLE DIAMETER 6"
SCREEN: DIA. LENGTH SLOT SIZE
CASING: DIA. LENGTH TYPE
DRILLING COMPANY: SwL DRILLING METHOD: C.F.A.
DRILLER: Robert Rowan GEOLOGIST: Kelley
DATE DRILLED 12/17/90

SITE MAP

DEPTH (FEET)	GRAPHIC LOG	WELL CONSTRUCTION	HNU	CORE / CUTTINGS	GEOTECHNICAL	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0			0			0.0-0.5	0.0-0.5	CONCRETE
			0			0.5-1.0	0.5-0.7	Dark yellowish orange fine backfill SAND, slightl moist, no odor
						1.0-1.5'		
			0			1.5-2.0'	0.7-6.0'	Dusty brown CLAY with light gray, small calcareou nodules, sligthly moist, no odor
			0			3.0-3.5'		
			0			3.5-4.5'		
5			0					
			0			6.0-6.5'	6.0-10.5'	Yellowish gray gravelly CLAY, with dusky brown clay nodules, slightly moist, no odor
			0					
			0			8.0-8.5'		
			0			8.5-9.0'		
10			0					
			0			11-11.5'	10.5-11.5'	Yellowish gray gravelly CLAY with few dusky brown CLAY nodules, calcareous, slightly moist, moderate hydrocarbon odor
			0				11.5-14.8'	Yellowish gray LIMESTONE, dry, no odor
			0					
			0			14.5-15.0'		
15			0				14.8-15.0'	Bluish gray limestone, dry, no odor
20								
25								

SOIL - BORING/MONITOR WELL LOG

BORING/WELL NUMBER: B-5

PROJECT: Engineers & Erectors, ESI OWNER: Capitol Wire & Cable

LOCATION: 900 Ave. F, Plano, TX PROJ. NUMBER: 90-2-266

TOTAL DEPTH: 15' WATER LEVEL: INITIAL Dry 24 HRS ____

SURFACE ELEVATION: ____

BORE HOLE DIAMETER 6"

SCREEN: DIA. ____ LENGTH ____ SLOT SIZE ____

CASING: DIA. ____ LENGTH ____ TYPE ____

DRILLING COMPANY: SwL DRILLING METHOD: C.F.A.

DRILLER: Robert Rowen GEOLOGIST: Kelley

DATE DRILLED 12/18/90

SITE MAP

DEPTH (FEET)	GRAPHIC LOG	WELL CONSTRUCTION	HNU	CORE	CUTTINGS	GEOTECHNICAL	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0			0				0-0.5	0.0-0.5	CONCRETE
			0				0.5-1.5'	0.5-0.7	Dark yellowish fine backfill SAND, slightly moist, no odor
							1.5-2.0'		
							2.0-2.5'	0.7-7.0'	Dusky brown CLAY, with light gray, small calcareous nodules, slightly moist, no odor
			0						
			0						
5			0						
			0						
			0					7.0-12.0'	Yellowish gray gravelly CLAY with dusky, brown clay nodules, slightly moist, no odor
			0				8.0-9.0'		
			0						
10			0				10.0-10.5'		
			0						
			0				12.0-12.5'	12.0-15.0'	Yellowish gray LIMESTONE, dry, no odor
			0						
			0						
15			0				14.5-15.0'		
20									
25									

OIL BORING/MONITOR WELL L

BORING/WELL NUMBER: B-6
PROJECT: Capitol Wire & Cable OWNER: Engineers & Erectors
LOCATION: 900 Avenue, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 16' WATER LEVEL: INITIAL Dry 24 HRS
SURFACE ELEVATION:
BORE HOLE DIAMETER 4-3/4"
SCREEN: DIA. LENGTH SLOT SIZE
CASING: DIA. LENGTH TYPE
DRILLING COMPANY: SwL DRILLING METHOD: CFA
DRILLER: M. Martin GEOLOGIST: J. Spriggs
DATE DRILLED 1/25/91

SITE MAP

DEPTH (FEET)	GRAPHIC LOG	WELL CONSTRUCTION	HNU	CORE	CUTTINGS	GEOTECHNICAL	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0	▲▲▲▲		0					0.0-0.7'	CONCRETE
			0					0.7-7.0'	Dusky brown CLAY with light gray mottles, slightly moist, no odor
			0						
			0						
			0						
5			0					7.0-9.5'	Yellowish gray to dusky yellow, gravelly CLAY, slightly moist, no odor
			0						
			0						
			0						
			0					9.5-12.0'	Yellowish gray, calcareous CLAY, slightly moist, very weak hydrocarbon odor
10			0				11.5-12.0'	12.0-15.5'	Yellowish gray LIMESTONE, dry, no odor
			0						
			0						
			0						
15			0				15.5-16.0'	15.0-16.0'	Bluish-gray LIMESTONE, dry, no odor
			0						
20									
25									

SOUTHWESTERN LABORATORIES

SOIL BORING/MONITOR WELL G

BORING/WELL NUMBER: B-7
PROJECT: Capitol Wire & Cable OWNER: Engineers & Erectors
LOCATION: 900 Avenue F, Plano, TX PROJ. NUMBER: 90-2-266
TOTAL DEPTH: 14.5' WATER LEVEL: INITIAL Dry 24 HRS
SURFACE ELEVATION:
BORE HOLE DIAMETER 4-3/4"
SCREEN: DIA. LENGTH SLOT SIZE
CASING: DIA. LENGTH TYPE
DRILLING COMPANY: SwL DRILLING METHOD: CFA
DRILLER: Milton Martin GEOLOGIST: Spriggs
DATE DRILLED 1/25/91

SITE MAP

DEPTH (FEET)	GRAPHIC LOG	WELL CONSTRUCTION	HNU	CORE	CUTTINGS	GEOTECHNICAL	SAMPLE INTERVAL	DESCRIPTION INTERVAL	DESCRIPTION/SOIL CLASSIFICATION
0			0					0.0-1.7'	CONCRETE
			0					1.7-7.5'	Dusky brown CLAY with light gray, calcareous mottles, slightly moist, no odor
			0						
			0						
			0						
5			0						
			0						
			0						
			0					7.5-9.0'	Dusky yellow to yellowish gray, gravelly CLAY, slightly moist, no odor
			0						
			0					9.0-11.5'	Yellowish gray, calcareous CLAY, slightly moist, very weak hydrocarbon odor
10			0						
			0				11.0-11.5'		
			0					11.5-14.0'	Yellowish gray LIMESTONE, dry, no odor
			0						
			0				14.0-14.5'	14.0-14.5'	Bluish-gray LIMESTONE, dry, no odor
15			0						
20									
25									

APPENDIX B

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
2575 LONE STAR DRIVE * P.O. BOX 224227, DALLAS,TEXAS 75222 * 214/631-2700

Client SWL/ECS
2575 LONE STAR DR.
DALLAS, TX 75212

Attn: JACK SPRIGGS

Client No.
Report No. DO-12-176
Report Date 12/26/90 09:49

Project EC90-2-266/ENG. & ERECTORS

Date Sampled 12/17/90

Sampled By JACK SPRIGGS

Sample Type SOIL

Transported by JACK SPRIGGS

P.O. # N/A

Date Received 12/18/90

Lab No.	Sample Identification
DO-12-176-01	B-1/3.0-3.5
DO-12-176-02	B-1/8.0-8.5
DO-12-176-03	B-1/14.5-15.0
DO-12-176-04	B-2/0.5-1.0
DO-12-176-05	B-2/8.0-8.5
DO-12-176-06	B-2/10.5-11.0
DO-12-176-07	B-2/14.5-15.0
DO-12-176-08	B-3/7.0-7.5
DO-12-176-09	B-3/9.0-10.0

SOUTHWESTERN LABORATORIES

Callie Smith

Reviewed By

Bob Garrett

Bob Garrett, Mgr, EAS

SOUTHWESTERN LABORATORIES

Order # DO-12-176
12/26/90 09:49
Client: SWL/ECS

TEST RESULTS BY SAMPLE

Sample: 01A B-1/3.0-3.5 Collected: 12/17/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/19/90	MD
Toluene		<0.02	MG/KG	0.02	12/19/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/19/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/19/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/19/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	27	MG/KG	5.0	12/20/90	LK

Sample: 03A B-1/14.5-15.0 Collected: 12/17/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/19/90	MD
Toluene		<0.02	MG/KG	0.02	12/19/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/19/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/19/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/19/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	33	MG/KG	5.0	12/20/90	LK

Sample: 05A B-2/8.0-8.5 Collected: 12/17/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/19/90	MD
Toluene		<0.02	MG/KG	0.02	12/19/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/19/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/19/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/19/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	25	MG/KG	5.0	12/20/90	LK

Sample: 06A B-2/10.5-11.0 Collected: 12/17/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/19/90	MD
Toluene		<0.02	MG/KG	0.02	12/19/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/19/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/19/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/19/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	14	MG/KG	5.0	12/20/90	LK

Sample: 09A B-3/9.0-10.0 Collected: 12/17/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/19/90	MD
Toluene		<0.02	MG/KG	0.02	12/19/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/19/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/19/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/19/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	19	MG/KG	5.0	12/20/90	LK

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

2575 Lone Star Drive, P. O. Box 224227, Dallas, Texas 75222

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Project No.: EC90-2-266

Client / Project: Engineers & Erectors / Capital Wire and Cable EST

Field Sample No. / Identification	Date and Time	Grab	Comp	No. of Sample Containers	Sample Type (Liquid, Sludge, etc.)	Preservative	Analysis Requested	Laboratory Remarks
B-1/3.0-3.5	12/17/90 12:15	✓		1	Soil	Ice	TPH, BTEX	1
B-1/8.0-8.5	12/17/90 12:25	✓		1	Soil	Ice	HOLD	2
B-1/14.5-15.0	12/17/90 13:18	✓		1	Soil	Ice	TPH, BTEX	3
B-2/0.5-1.0	12/17/90 15:05	✓		1	Soil	Ice	HOLD	4
B-2/8.0-8.5	12/17/90 15:20	✓		1	Soil	Ice	TPH, BTEX	5
B-2/10.5-11.0	12/17/90 15:45	✓		1	Soil	Ice	TPH, BTEX	6
B-2/14.5-15.0	12/17/90 15:40	✓		1	Soil	Ice	HOLD	7
B-3/7.0-7.5	12/17/90 17:00	✓		1	Soil	Ice	HOLD	8

Samplers : (Signature): Jack Spriggs

Affiliation: S.E.-S.E.

Relinquished by: (Signature) Jack Spriggs — Date: 12/17/90 Time: 19:22

Received by: (Signature) [illegible] — Date: 12/17/90 Time: 19:23

Relinquished by: (Signature) — Date: Time:

Received by: (Signature) — Date: Time:

Relinquished by: (Signature) — Date: Time:

Received by Laboratory: (Signature) — Date: 12/18/90 Time: 10AM

COC Seal I.

Intact:

Remarks:

Data Results To:
1. Jack Spriggs
2.

Laboratory No.: 9012 116

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

2575 Lone Star Drive, P. O. Box 224227, Dallas, Texas 75222

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Project No.: EC90-2-266

Client / Project: Engineers & Erectors / Capital Wire and Cable ESI

Field Sample No. / Identification	Date and Time	Grab	Comp	No. of Sample Containers	Sample Type (Liquid, Sludge, etc.)	Preservative	Analysis Requested	Laboratory Remarks
B-3/9.0-10.0	12/17/90 17:05	✓		1	Soil	Ice	TPH, BTEX	9

Samplers : (Signature)		Relinquished by: (Signature)	Date: 12/17/90 Time: 19:22	Received by: (Signature)	Date: 12-17-90 Time: 19:23	COC Seal N
Affiliation		Relinquished by: (Signature)	Date: Time:	Received by (Signature)	Date: Time:	
52-52		Relinquished by: (Signature)	Date: Time:	Received by Laboratory: (Signature)	Date: Time:	Intact:

Remarks:

Data Results To:
1. Jack Spriggs
2.

Laboratory No.: 901176

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
2575 LONE STAR DRIVE * P.O. BOX 224227, DALLAS,TEXAS 75222 * 214/631-2700

Client SWL/ECS
2575 LONE STAR DR.
DALLAS, TX 75212

Attn: JACK SPRIGGS

Client No. EC90_2_266
Report No. DO-12-188
Report Date 01/08/91 08:24

Project EC90-2-266/ENGINEERS@ERCTORS

Date Sampled 12/18/90

Sampled By R. KELLY

Sample Type SOIL

Transported by R. KELLY

P.O. # N/A

Date Received 12/19/90

Lab No.	Sample Identification
DO-12-188-01	B-1/B-2
DO-12-188-02	MW3/B-4/B-5
DO-12-188-03	B-3/12.0-12.5
DO-12-188-04	B-3/14.5-15.0
DO-12-188-05	B-4/11.0-11.5
DO-12-188-06	B-4/14.5-15.0
DO-12-188-07	B-5/14.5-15.0

Cillia Smith
Reviewed By

SOUTHWESTERN LABORATORIES

Bob Garrett
Bob Garrett, Mgr., EAS

TEST RESULTS BY SAMPLE

Sample: 01A B-1/B-2 Collected: 12/18/90 16:30

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TCLP CHROMIUM	SW_846_7190	0.09	MG/L		12/31/90	MB
TCLP LEAD	SW_846_7420	<0.10	MG/L		12/28/90	JG
TCLP PREP.		12/26/90	DATE COM		12/26/90	QZ
TOT.PET. HYDROCARBONS SOIL	EPA418_1	40	MG/KG	5.0	12/21/90	LK

Sample: 02A MW3/B-4/B-5 Collected: 12/18/90 17:20

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TCLP CHROMIUM	SW_846_7190	<0.05	MG/L		12/31/90	MB
TCLP LEAD	SW_846_7420	<0.1	MG/L		01/02/91	LK
TCLP PREP.		12/26/90	DATE COM		12/26/90	DK
TOT.PET. HYDROCARBONS SOIL	EPA418_1	47	MG/KG	5.0	12/21/90	LK

Sample: 04A B-3/14.5-15.0 Collected: 12/18/90

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	1100	MG/KG	5.0	12/21/90	LK

Sample: 05A B-4/11.0-11.5 Collected: 12/18/90 15:15

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	160	MG/KG	5.0	12/21/90	LK

Sample: 06A B-4/14.5-15.0 Collected: 12/18/90 15:40

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	9	MG/KG	5.0	12/21/90	AL

Sample: 07A B-5/14.5-15.0 Collected: 12/18/90 17:25

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	12/20/90	MD
Toluene		<0.02	MG/KG	0.02	12/20/90	MD
Ethylbenzene		<0.02	MG/KG	0.02	12/20/90	MD
Total Xylenes		<0.02	MG/KG	0.02	12/20/90	MD
Total BTEX		<0.02	MG/KG	0.02	12/20/90	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	190	MG/KG	5.0	12/21/90	AL

Page 1 of 1

SwL SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

2575 Lone Star Drive, P. O. Box 224227, Dallas, Texas 75222

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Project No. EC90-2-266

Client / Project: Engineers & Erectors / Capitol Wire and Cable ESI

Field Sample No. / Identification	Date and Time	Grab	Comp	No. of Sample Containers	Sample Type (Liquid, Sludge, etc.)	Preservative	Analysis Requested	Laborat Remarks
B-1 / B-2	12/18/90 16:30		✓	1	Soil	Ice	TCLP Chrome, TCLP Lead, TPH, BTEX	1
MW3 / B-4 / B-5	12/18/90 17:20		✓	1	Soil	Ice	TCLP Chrome, TCLP Lead, TPH, BTEX	2
B-3 / 12.0 - 12.5	12/18/90 10:25	✓		1	Soil	Ice	Hold	3
B-3 / 14.5 - 15.0	12/18/90 11:15	✓		1	Soil	Ice	TPH, BTEX	4
B-4 / 11.0 - 11.5	12/18/90 15:15	✓		1	Soil	Ice	TPH, BTEX	5
B-4 / 14.5 - 15.0	12/18/90 15:40	✓		1	Soil	Ice	TPH, BTEX	6
B-5 / 14.5 - 15.0	12/18/90 17:25	✓		1	Soil	Ice	TPH, BTEX	7

Samplers : (Signature)	Relinquished by: (Signature)	Date : 12/19/90 Time : 8:42	Received by : (Signature)	Date : Time :	COC Seal No.
Affiliation	Relinquished by: (Signature)	Date : Time :	Received by : (Signature)	Date : Time :	
	Relinquished by: (Signature)	Date : Time :	Received by Laboratory: (Signature)	Date : 12/19/90 Time : 8:42	Intact:

Remarks:

Data Results To:
1. Jack Spriggs

Laboratory No. 11012188

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

2575 LONE STAR DRIVE * P.O. BOX 224227, DALLAS,TEXAS 75222 * 214/631-2700

Client SWL/ECS
2575 LONE STAR DR.
DALLAS, TX 75212

Attn: JACK SPRIGGS

Client No.
Report No. D1-01-200
Report Date 01/30/91 09:22

Project 90-2-266/ENGINEER & ERECTORS

Date Sampled 01/25/91

Sampled By JACK SPRIGGS

Sample Type SOIL

Transported by JACK SPRIGGS

P.O. # _____

Date Received 01/28/91

Lab No.	Sample Identification
D1-01-200-01	B-6 11.5-12.0
D1-01-200-02	B-6 15.5-16.0
D1-01-200-03	B-7 11.0-11.5
D1-01-200-04	B-7 14.0-14.5

SOUTHWESTERN LABORATORIES

William J. Hare
Reviewed By

Bob Garrett

Bob Garrett, Mgr., EAS

TEST RESULTS BY SAMPLE

Sample: 01A B-6 11.5-12.0 Collected: 01/25/91 12:21

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/28/91	MD
Toluene		<0.02	MG/KG	0.02	01/28/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/28/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/28/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/28/91	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	32	MG/KG	5.0	01/28/91	JR

Sample: 02A B-6 15.5-16.0 Collected: 01/25/91 13:45

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/28/91	MD
Toluene		<0.02	MG/KG	0.02	01/28/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/28/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/28/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/28/91	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	<5	MG/KG	5.0	01/28/91	JR

Sample: 03A B-7 11.0-11.5 Collected: 01/25/91 14:40

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/28/91	MD
Toluene		<0.02	MG/KG	0.02	01/28/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/28/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/28/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/28/91	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	<5	MG/KG	5.0	01/28/91	JR

SOUTHWESTERN LABORATORIES

Order # D1-01-200
01/30/91 09:22
Client: SWL/ECS

Sample: 04A B-7 14.0-14.5 Collected: 01/25/91 16:15

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/28/91	MD
Toluene		<0.02	MG/KG	0.02	01/28/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/28/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/28/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/28/91	MD
TOT.PET. HYDROCARBONS SOIL	EPA418_1	13	MG/KG	5.0	01/28/91	JR

Page 1 of 1

SwL SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
2575 Lone Star Drive, P. O. Box 224227, Dallas, Texas 75222

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Project No.: 90-2-266

Client / Project: Engineers & Erectors / Capital Wire & Cable

Field Sample No. / Identification	Date and Time	Grab	Comp	No. of Sample Containers	Sample Type (Liquid, Sludge, etc.)	Preservative	Analysis Requested	Laboratory Remarks
B-6/11.5-12.0	1/25/91 12:21	✓		1	Soil	Ice	TPH, BTEX	
B-6/15.5-16.0	1/25/91 13:45	✓		1	Soil	Ice	TPH, BTEX	
B-7/11.0-11.5	1/25/91 14:40	✓		1	Soil	Ice	TPH, BTEX	
B-7/14.0-14.5	1/25/91 16:15	✓		1	Soil	Ice	TPH, BTEX	

Samplers: (Signature) [signature]

Affiliation: 52-52

Relinquished by	Date / Time	Received by	Date / Time
Relinquished by: (Signature) [signature]	Date: 1/28/91 Time:	Received by: (Signature)	Date: Time:
Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:
Relinquished by: (Signature)	Date: Time:	Received by Laboratory: (Signature) [signature]	Date: 1/28/91 Time: 8:4[illegible]

COC Se

Intact:

Remarks:

Data Results To:
1. Jack Spriggs
2.

Laboratory No. 9101 200

SWL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
2575 LONE STAR DRIVE * P.O. BOX 224227, DALLAS,TEXAS 75222 * 214/631-2700

Client SWL/ECS
2575 LONE STAR DR.
DALLAS, TX 75212

Attn: JACK SPRIGGS

Client No.
Report No. D1-01-173
Report Date 01/31/91 17:45

Project 90-2-266/ENGINEERS & ERECTORS

Date Sampled 01/23/91

Sampled By JACK SPRIGGS

Sample Type SOIL

Transported by JACK SPRIGGS

P.O. # _____

Date Received 01/23/91

Lab No.	Sample Identification
D1-01-173-01	CAPITAL WIRE/SS-1
D1-01-173-02	CAPITAL WIRE/SS-2

SOUTHWESTERN LABORATORIES

Reviewed By

Bob Garrett, Mgr., EAS

TEST RESULTS BY SAMPLE

Sample: 01A CAPITAL WIRE/SS-1 Collected: 01/23/91 11:40

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/24/91	MD
Toluene		<0.02	MG/KG	0.02	01/24/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/24/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/24/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/24/91	MD
TCLP CHROMIUM	SW_846_7190	<0.05	MG/L		01/29/91	JG
TCLP LEAD	SW_846_7420	<0.10	MG/L		01/28/91	JG
TCLP PREP.		01/24/91	DATE COM		01/24/91	QZ
TOT.PET. HYDROCARBONS SOIL	EPA418_1	870	MG/KG	5.0	01/30/91	JR

Sample: 02A CAPITAL WIRE/SS-2 Collected: 01/23/91 11:53

Test Name	Method	Result	Units	Detection Limit	Date Started	Analyst
BTEX - SOIL SAMPLE	EPA_8020					
Benzene		<0.02	MG/KG	0.02	01/24/91	MD
Toluene		<0.02	MG/KG	0.02	01/24/91	MD
Ethylbenzene		<0.02	MG/KG	0.02	01/24/91	MD
Total Xylenes		<0.02	MG/KG	0.02	01/24/91	MD
Total BTEX		<0.02	MG/KG	0.02	01/24/91	MD
TCLP CHROMIUM	SW_846_7190	<0.05	MG/L		01/29/91	JG
TCLP LEAD	SW_846_7420	<0.10	MG/L		01/28/91	JG
TCLP PREP.		01/24/91	DATE COM		01/24/91	QZ
TOT.PET. HYDROCARBONS SOIL	EPA418_1	190	MG/KG	5.0	01/24/91	LK

SwL

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

2575 Lone Star Drive, P. O. Box 224227, Dallas, Texas 75222

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Project No.: 90-2-266

Client / Project: Engineers & Erectors Kapital Wire & Cable

Field Sample No. / Identification	Date and Time	Grab	Comp	No. of Sample Containers	Sample Type (Liquid, Sludge, etc.)	Preservative	Analysis Requested	Laboratory Remarks
Cable Wire/SS-1	1/23/91 11:40		✓	1	Soil	Ice	TPH, BTEX, TCLP Lead, TCLP Chrome	
Capital Wire/SS-2	1/23/91 11:53		✓	1	Soil	Ice	TPH, BTEX, TCLP Lead, TCLP Chrome	

Samplers : (Signature): Jack Spriggs

Affiliation: 52-52

Relinquished by: (Signature) Jack Spriggs — Date : 1/23/91 Time : 13:15

Received by : (Signature) — Date : Time :

Relinquished by: (Signature) — Date : Time :

Received by : (Signature) — Date : Time :

Relinquished by: (Signature) — Date : Time :

Received by Laboratory: (Signature) T. Waitt — Date : 1/23/91 Time : 1317

COC Seal No.

Intact:

Remarks :

Data Results To:

1. Jack Spriggs

2.

Laboratory No. 910123

APPENDIX C

Agency Information Consultants, Inc.
P.O. Box 2181 Austin, Texas 78768 2181 Tel. (512) 478 8991 Fax. (512) 478-5215

January 15, 1991

Richard Kelly
Southwestern Laboratories
2575 Lone Star Drive
Dallas, Texas 75222

re: Water Well Search
1/2 Mile Radius
Plano, Texas
PO# 60-02817

Dear Mr. Kelly,

Agency Information Consultants, Inc. (AIC) has performed a water well search within the area delineated on the attached map. The following steps were utilized by AIC for this project:

1. Transferred all "located" and "plotted" water well data from the (Texas Water Development Board) TWDB county highway maps onto the map provided by AIC within the Area Of Review (AOR)

2. Transferred all "located" water well data from the TWDB United States Geological Survey (USGS) 7.5 minute topographic maps within the AOR onto the map provided by AIC.

3. Obtained copies of the "located" and "plotted" water well schedules/logs for the water wells found within the AOR at the Texas Water Commission (TWC) central records.

4. Obtained copies of the water well logs for the "partially" numbered water wells which were found to be within the AOR.

The following is a brief explanation of terms:

Located water wells - wells whose sites have been verified in person by a TWDB or USGS staff member and spotted on a map at the TWDB.

Plotted water wells - wells whose sites have been determined from the information submitted on the water well logs, and subsequently spotted on a TWDB county highway map by a TWDB staff member. Since June of 1986, the TWDB has stopped mapping these wells.

Partially numbered water wells - wells whose logs have been processed since June of 1986. These wells are given a State ID Number which establish it within a 2.5 minute quad.

AIC was unable to identify any water wells within the AOR. There are no located water wells, no plotted water wells, and no partially numbered water wells. The following is a listing of the wells.

LOCATED WATER WELLS
State ID Number
None Found

PLOTTED WATER WELLS
State ID Number
None Found

PARTIALLY NUMBERED WATER WELLS
State ID Number
None Found

NOTE: Frequently, there is more than one water well per State ID Number. This is due to a large concentration of water wells within a relatively small area. The number of wells, if greater than one, for each State ID Number will be listed out to the right of the column. The records for those wells which share a common State ID Number will be found stapled together.

Enclosed is a map showing the AOR and the water wells found within it, along with their well schedules/logs.

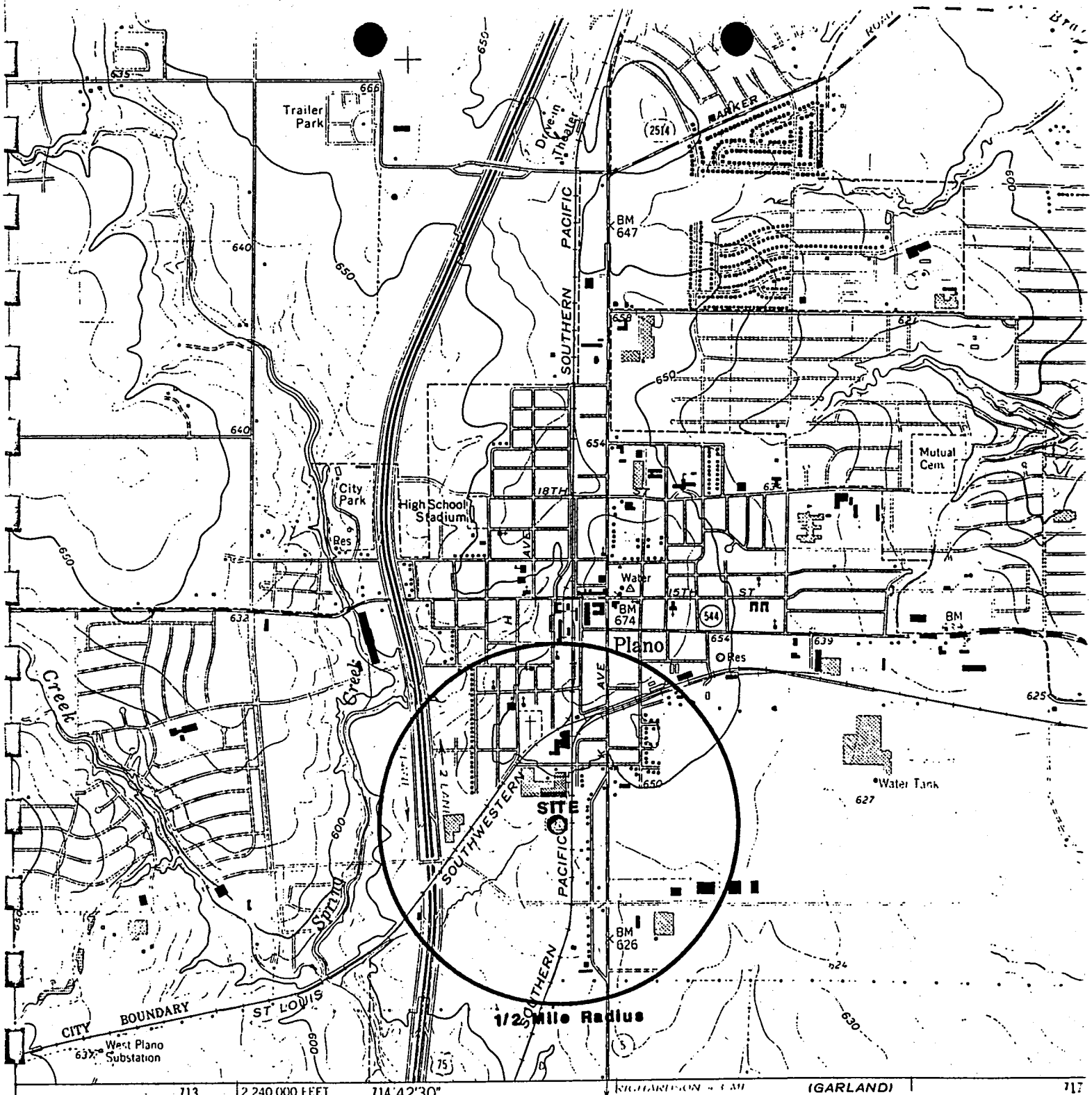
AIC's research of water wells within the AOR was performed by an examination of the maps at the TWDB and the files within the TWC central records. Due to the fact that some water well schedules were never submitted by drillers and the unaccountability of privately drilled water wells, AIC is unable to provide 100% of the data in the AOR.

If you have any questions regarding this project or any future projects please call me at 512-478-8991.

Sincerely,

Brady Kyle Peterson
Research Consultant

Enclosures


Trailer Park
Drive-in Theater
PARKER
PACIFIC
SOUTHERN
BM 647
Mutual Cem.
City Park
High School Stadium
18TH
AVE
Water
15TH
ST
BM 674
544
Plano
Res
Creek
Spring Creek
SITE
SOUTHWESTERN
PACIFIC
SOUTHERN
BM 626
1/2 Mile Radius
Water Tank
CITY BOUNDARY
ST LOUIS
West Plano Substation
713
2 240 000 FEET
714 42'30"
GARLAND
6649 I NW
SCALE 1:24000
1000 0 1000 2000 3000 4000 5000 6000
1 5 0
CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
MN
GN
1°16'
23 MILS
8°
142 MILS
UTM GRID AND 1973 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET
sions shown in purple compiled from photographs
en 1968 and 1973. This information not field checked
ple tint indicates extension of urban areas
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTC
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON

APPENDIX D

Waste Management of North America
GENERATOR'S SPECIAL WASTE PROFILE SHEET

TYPE A Waste

PLEASE PRINT IN INK OR TYPE

☐ WMA 047550
Waste Profile Sheet Code

INSTRUCTIONS FOR COMPLETING THIS FORM ARE ATTACHED

(Shaded Areas For WMNA Use Only)

Renewal Date of Service Agreement: **WMNA Sales Rep#:**

A. WHERE IS THE WASTE GENERATED?

1. Generator Name: Capital Wire and Cable
2. Facility Address (site of waste generation): 910 10th Street
3. Generator City, State/Province: Plano, Texas 4. Zip/Postal Code: 75074
5. Generator USEPA/Federal ID: N/A
6. Generator State/Province ID: N/A
7. Technical Contact: Jack Spriggs, Southwestern Laboratories, Dallas 8. Phone: (214) 631-2??

B. WHERE ARE WASTE MANAGEMENT, INC. INVOICES SENT?

1. ☐ Generating Facility (A, above), or
2. Company Name: Engineers and Erectors, Inc. 3. Phone: (214) 442-744?
4. Address: P.O. Box 706 #665 Country Club Rd.
5. Generator City, State/Province: Allen, Texas 6. Zip/Postal Code: 75002

C. PHYSICAL CHARACTERISTICS OF WASTE (See Instructions)

1. Name of Waste: Diesel affected soils
2. Process Generating Waste: Underground Storage Tank
3. Special Handling Instructions: N/A

4. Color	5. Does the waste have a strong incidental odor?	6. Physical State @ 70°F/21°C:	7. Layers	8. Specific Gravity:	9. Free Liquids:
Brown	☑ No ☐ Yes if so, describe:	☑ Solid ☐ Semi-Solid ☐ Liquid ☐ Powder Other:	☐ Multi-layered ☐ Bi-layered ☑ Single Phased	Range 1.5 - 2.0	☐ Yes ☑ No Volume:

10. pH: ☐ ≤ 2 ☐ > 2-4 ☐ 4-7 ☐ 7 ☐ 7-10 ☐ 10- < 12.5 ☐ ≥ 12.5 ☐ Range ☑ NA

11. Flash Point: ☐ None ☐ <140°F/60°C ☑ 140°-199°F/60°-83°C ☐ ≥ 200°F/93°C ☐ Closed Cup ☐ Open Cup

D. TRANSPORTATION INFORMATION

1. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Sludge ☑ Bulk Solid ☐ Drum/Box ☐ Other
2. Annual Amount/Units: 200 cubic yards
3. Supplemental Information:
4. Is this a DOT hazardous material? ☑ No ☐ Yes (If so, complete 5, 6 &7) 5. Hazard Class/ID #:
6. Reportable Quantity/ Units (lb/kg): 7. Shipping Name:

☑ Check this box if additional information is attached. LAB REPORTS

Turn Page and Complete Side 2

Waste Management of North America
GENERATOR'S SPECIAL WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

CHEMICAL COMPOSITION

	RANGE MIN.-MAX.	
SEE ATTACHED ANALYSIS	-	%
	-	%
	-	%
	-	%
	-	%
	-	%
	-	%
	-	%
	-	%
	-	%
	-	%

Please note: The chemical composition total in the maximum column must be greater than or equal to 100%. Total: _____ %

2. Does this waste contain any of the following (provide concentration if known):

	NO or	LESS THAN or	ACTUAL
PCB's	☑	☐ <50 ppm	_____ ppm
Cyanides	☑	☐ <50 ppm	_____ ppm
Sulfides	☑	☐ <50ppm	_____ ppm
Phenolics	☑	☐ <50 ppm	_____ ppm

METALS

Does this waste contain any of the following metals (provide concentration if known):

Arsenic	☐ <5 or N/A ppm	Barium	☐ <100 or N/A ppm	Cadmium	☐ <1 or N/A ppm
Chromium	☑ <5 or _____ ppm	Lead	☑ <5 or _____ ppm	Mercury	☐ <0.2 or N/A ppm
Selenium	☐ <1 or N/A ppm	Silver	☐ <5 or N/A ppm	Copper	☐ N/A ppm
Nickel	☐ N/A ppm	Zinc	☐ N/A ppm	_____	ppm

Indicate method used to determine concentration (if provided): ☐ EP TOX ☑ TCLP, or ☐ Total

GENERATOR CERTIFICATION

By signing this profile sheet, the generator certifies that unless clearly stated above or in attachments:
this waste is not a "Hazardous Waste" as defined by USEPA or Canadian Federal regulation and/or the state/province.
this waste does not contain regulated quantities of PCB's (Polychlorinated Biphenyls).
this sheet and its attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.
The Contractor's Definition of Special Waste (Form WMNA 0038 AD) has been read, signed and attached.

5. Signature: Thomas K Jorgensen

6. Title: Plant Eng

Name (Type or Print): THOMAS K. JORGENSEN

8. Date: 2-6-91

WASTE MANAGEMENT OF NORTH AMERICA

GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE

PLEASE PRINT IN INK OR TYPE

WMA 047550

(Shaded area for WMNA use only) WMNA Sales Rep. #: Waste Profile Sheet Code

This completed form must be returned, with the representative sample, to:

_____

_____

_____

INSTRUCTIONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE. In order to determine whether Waste Management of North America (WMNA) can accept the Special Waste described in the Generator's Special Waste Profile Sheet referenced above, you must supply a representative sample of the waste, or sign Part E below certifying that analytical data presented to Waste Management were derived from testing of a representative sample. A representative sample is defined as a sample obtained using any of the applicable sampling methods specified in Federal, State or Provincial Regulations. If you collect a representative sample of your waste, apply the peel off label and ship your sample along with this form to the address noted above. If you have any questions, please refer to the instructions for this form, or contact your WMNA sales representative.

SAMPLING METHOD (Indicate the method used and sign line 5 in Section C to certify a representative sample was taken)

1. ☐ I have obtained a representative sample of the waste material described in the Generator's Special Waste Profile Sheet referenced above according to the sampling methods specified in 40 CFR 261-Appendix I or equivalent Canadian rules.
2. ☑ I have obtained a representative sample of the waste material described in the Generator's Special Waste Profile Sheet referenced above by an equivalent method.

SAMPLING SOURCE (e.g., drum, lagoon, pit, pond, tank, vat)

2 samples from stockpile soils. Each sample was a composite of 5 areas.

REPRESENTATIVE SAMPLE CERTIFICATION AND SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

1. Waste Profile Sheet Code:		1. Waste Profile Sheet Code:
2. [redacted] Generator's Name:	Capital Wire and Cable	2. Generator's Name:
3. [redacted] Name of Waste:	Diesel affected Soils	3. Name of Waste:
4. [redacted] Sample Hour/Date:	11:00 A.M. / 1/23/91	4. Sample Hour/Date:
5. [redacted] Sampler's Signature:	Jack Spriggs	5. Sampler's Signature:

6. Print Sampler's Name: Jack L. Spriggs
7. Sampler's Title: Project Hydrogeologist
8. Sampler's Employer (if other than generator, see D. below): Southwestern Laboratories, Inc.

WITNESS VERIFICATION (if required) In most circumstances the customer will obtain the sample. However, in those cases in which WMNA or another contractor obtains the sample, one of the customer's employees must be present to direct the particular source to be sampled, to witness the sampling, and to complete this Part D.

I was personally present during the sampling described. I directed the waste source to be sampled, and I verify the information noted above.

1. Witness' Signature: _____
2. Witness' Name: _____ 3. Witness' Title: _____
4. Witness' Employer: _____ 5. Date: _____

REPRESENTATIVE DATA CERTIFICATION (Complete Parts A, B, & C to the extent possible)

By signing below the customer is certifying that:

The analytical data presented to Waste Management of North America were derived from testing of a representative sample taken in accordance with one of the methods listed in Part A of this form.

Jack L Spriggs — Signature

Project Hydrogeologist — Title

Jack L. Spriggs — Name

2/6/91 — Date

Printed on recycled paper

CONTRACTOR'S DEFINITION OF SPECIAL WASTE

Special Waste" means Type A or Type B Special wastes as defined below.

WASTE PROFILE CODE

"Type A Special Waste" means any waste, from a commercial or industrial activity meeting any of the following descriptions.

a. A containerized waste (e.g., a drum, portable tank, lugger box, roll-off box, pail, bulk tanker, etc.) listed in b.-g. below.
b. A waste containing free liquids.
c. A sludge waste.
d. A waste from an industrial process.
e. A waste from a pollution control process.
f. Residue and debris from the cleanup of a spill of a chemical substance or commercial product or a waste listed in a.-e. or g.
g. Contaminated residuals, or articles from the cleanup of a facility generating, storing, treating, recycling, or disposing of wastes listed in a.-f.

Incidental Amounts of Special Waste

The Contractor recognizes that many customers will produce some "Type B Special Waste," as defined below. Incidental quantities of "Type B Special Waste," do not require a Generator's Type B Special Waste Profile Sheet (Form WMNA-0089B) to be signed by the customer. However, the customer must identify the type and amount of Type B Special Wastes which will be provided to the Contractor in incidental amounts by completing the box in the lower right corner.

"Type B Special Waste" means any waste from a commercial or industrial activity meeting the descriptions which follow:

a. **Friable asbestos waste from building demolition or cleaning;** wall board, wall spray coverings, pipe insulation, etc. Nonfriable asbestos is not a special waste unless it has been processed, handled or used in such a way that asbestos fibers may be freely released. Asbestos-bearing industrial process waste is a "Type A Special Waste.
b. **Commercial products or chemicals which are off-specification, outdated, unused or banned.** Out-dated or off-specification, uncontaminated food or beverage products in original consumer containers are not included in this category, however, containers which once held commercial products or chemicals are included unless the container is empty. A container is empty when:
   All wastes have been removed that can be removed using the practices commonly employed to remove materials from the type of container, e.g., pouring, pumping or aspirating, and an end has been removed (for containers in excess of 25 gallons), and no more than 1 inch (2.54 centimeters) of residue remains on the bottom of the container or inner liner, or no more than 3% by weight of the total capacity of the container remains in the container (containers $\leq$ 110 gallons), or no more than 0.3% by weight of the total capacity of the container remains in the container (containers > 110 gallons.) Containers which once held ACUTELY HAZARDOUS WASTES must be triple rinsed with an appropriate solvent or cleaned by an equivalent method. Containers which once held substances regulated under the Federal Insecticide, Fungicide, and Rodenticide Act must be empty according to label instructions or triple rinsed.
c. **Untreated bio-medical waste - Any waste capable of inducing infection due to contamination with infectious agents from a bio-medical source including but not limited to a medical practitioner, hospital, medical clinic, nursing home, university medical laboratory, mortuary, taxidermist, veterinarian, veterinary hospital or animal testing laboratory.** Sharps from these sources must be rendered harmless or placed in needle puncture proof containers. Residue from incineration of infectious wastes is a "Type A Special Waste."
d. **Treated bio-medical wastes - Any wastes from a bio-medical source including but not limited to a hospital, medical clinic, nursing home, medical practitioner, mortuary, taxidermist, veterinarian hospital, animal testing laboratory, or university medical laboratory which has been autoclaved or otherwise heat treated or sterilized so that it is no longer capable of inducing infection.** Any sharps from these sources must be rendered harmless or placed in needle puncture proof containers.
e. **Liquids and sludges** from septic tanks, food service grease traps, or washwater and wastewaters from commercial laundries, laundromats and car washes unless these wastes are managed at commercial or public treatment works.
f. **Chemical-containing equipment removed from service.** Examples: filters, cathode ray tubes, lab equipment, acetylene tanks, fluorescent light tubes, etc.
g. **Waste produced from the demolition or dismantling of industrial process equipment or facilities contaminated with chemicals from the industrial process** Chemicals or wastes removed or drained from such equipment or facility are "Type A Special Wastes."

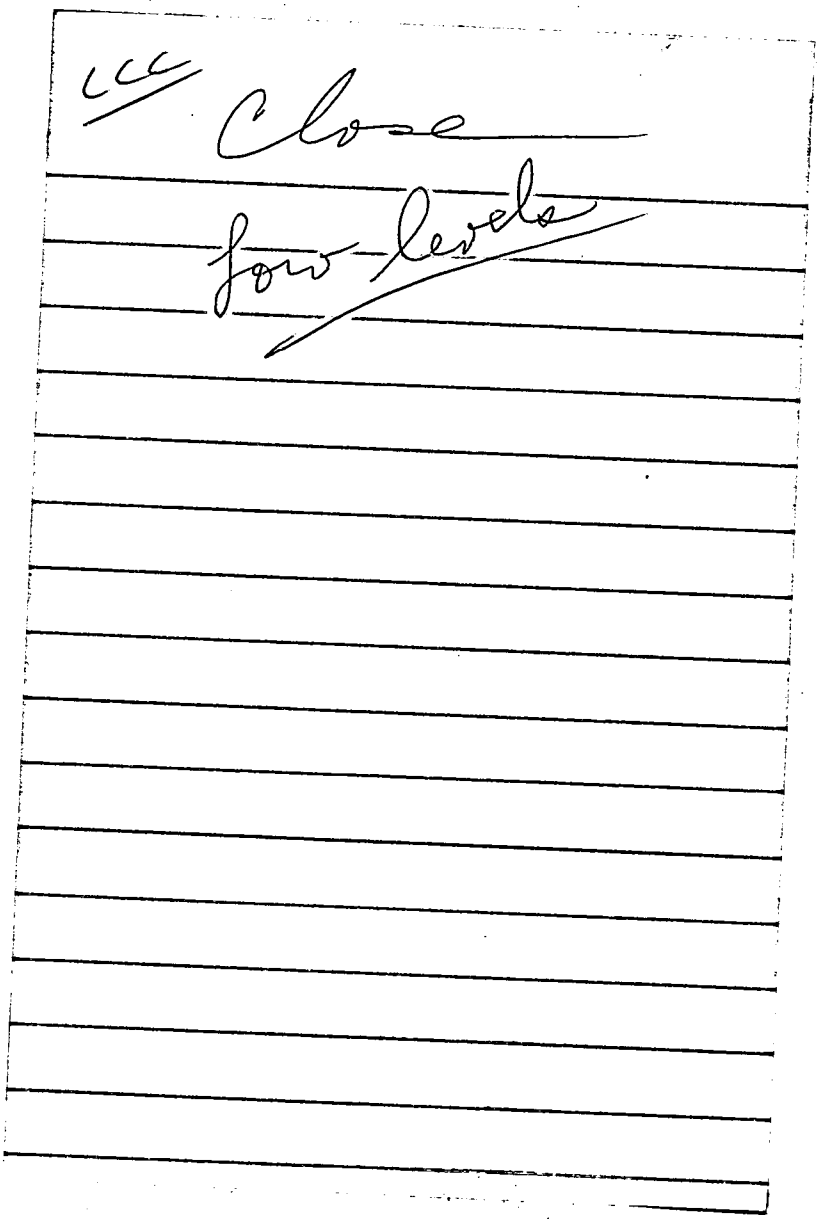
CUSTOMER ACKNOWLEDGES THAT HE HAS READ THE FOREGOING DEFINITION AND HAS IDENTIFIED THE TYPES AND AMOUNTS OF ANY <u>TYPE B</u> WASTE STREAMS PRODUCED IN INCIDENTAL AMOUNTS.

Spital Wire & Cable
STOMER

Thomas K Jorgensen
THORIZED SIGNATURE

2/6/91
TE

INCIDENTAL WASTE TYPES AND AMOUNTS:
Diesel affected soils
200 cubic yards


Close
four levels

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 11, 1999

Mr. James F. Holloway
Capital Wire and Cable
910 10th St.
Plano, TX 75074

Re: Subsurface Release of Hydrocarbons at Capital Wire and Cable, 900 Ave F, Plano (Collin County), Texas
(LPST ID No. 92195 - Priority 4.2 - Facility ID No. 0019699)

Dear Mr. Holloway:

This letter confirms the completion of corrective action requirements for the release incident at the above-referenced facility. Based upon the submitted information and with the provision that the documentation provided to this agency was accurate and representative of site conditions, we concur with your certification that the closure requirements have been met. No further corrective action for the release incident is necessary. The justification for final closure includes but is not limited to the following criteria:

- BTEX levels in soil were found to be non-detectable at the subject site.
- TPH concentrations in the soil were above TNRCC action levels. However, the contaminated soil was disposed of at a landfill, where higher levels of TPH are allowable.
- There is no affected groundwater or surface water in close proximity to this site.

For any subsequent release from an underground or aboveground storage tank at this site, the deductible will be increased in accordance with Section 26.3512 of the Texas Water Code. Please note that financial assurance must be maintained for all operational storage tanks at this site. Please be aware that case closure is based on identified exposure pathways and that any remaining contaminant levels and potential exposure pathways should be evaluated when conducting any future soil excavation or construction activities at this site. Please ensure that any wastes generated from these activities are handled in compliance with all applicable regulations.

Please be advised that all monitor wells which are not now in use and/or will not be used in the next 180 days must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title 30, Texas Administrative Code (TAC), Section 238.48-238.50.

A State of Texas Plugging Report (Form No. TNRCC-0055) is required to be submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation, P.O. Box 12157, Capitol Station, Austin, Texas 78711, within thirty (30) days of plugging completion. If you have any questions regarding the future use of an existing monitor well, please contact the Texas Department of Licensing and Regulation at 512/463-7880 or 800/803-9202.

If any monitor well plugging or other necessary site restoration activities will be performed to complete site closure, please prepare a *Final Site Closure Report* to document the conclusion of actual site closure. For sites which are eligible for reimbursement through the Petroleum Storage Tank Remediation Fund, written preapproval should be obtained prior to initiation of any remaining site closure activities. Reimbursement claims for activities that were not preapproved will not be paid until all claims for preapproved work are processed and paid.

Please note that the *Final Site Closure Report*, if necessary, will be the last submittal associated with this case. This final concurrence letter signifies the completion of corrective action associated with the release. No subsequent TNRCC correspondence will be issued in response to the *Final Site Closure Report*.

Please note that all correspondence must include the LPST ID Number and must be submitted to both the local TNRCC Regional Field Office and to the Central Office in Austin.

Should you have any questions, please contact Ms. Brandy Maxfield of my staff at 512/239-2200. **Please reference the LPST ID Number when making inquiries.** Your cooperation in this matter has been appreciated.

Sincerely,

Bob Beleckis
Team Leader, Team III
PST Responsible Party Remediation Section
Remediation Division

RAB/BLM/mel
92195.fnn

cc: Sam Barrett, TNRCC 04 Field Office, 817/469-6750
1101 East Arkansas Lane, Arlington, Texas 76010-6499

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

TO : FILE **DATE**: May 7, 1999

THRU : Bob Beleckis
Team Leader, RPR Team III
Responsible Party Remediation Section

FROM : Brandy Maxfield, Coordinator, Team III
Responsible Party Remediation Section

SUBJECT : File Review For Closure of Subsurface Release of Hydrocarbons at Capital Wire and Cable, 900 Ave F, Plano, (Collin County), Texas
(LPST ID No. 92195 - Priority 4.2 - Facility ID No. 0019699)

A gasoline spill of an unknown amount was reported to the TNRCC on July 8, 1988. A visual observation was made that unleaded gasoline had leaked at a fill tube connection, most likely due to either corrosion or improper installation. The tanks previously on-site included one (1) 6,000-gal isopropyl alcohol tank, one (1) 4,000-gal gasoline and one (1) 8,000-gal gasoline underground storage tanks (USTs).

A minimal site assessment was performed in July of 1988, after the discovery of the release. Seven (7) soil borings were drilled to obtain soil samples and determine the extent of contamination. Concentrations for benzene, toluene, ethyl benzene, and total xylenes were all non-detectable. Maximum total petroleum hydrocarbons (TPH) were analyzed at 434 ppm.

The incident report, dated September 21, 1988, indicates that neither groundwater, nor surface water is affected. In addition, there is no known surface water in close proximity to this site. Therefore, it is my recommendation that no further corrective action is warranted, and a final concurrence letter should be issued to the responsible party based on the following:

- BTEX levels in soil were found to be non-detectable at the subject site.
- TPH concentrations in the soil were above TNRCC action levels. However, the contaminated soil was disposed of at a landfill, where higher levels of TPH are allowable.
- There is no affected groundwater or surface water in close proximity to this site.

Based on the above conditions and the recent closure criteria established by the TNRCC, it is my opinion that the contaminant levels remaining at this site will not pose a risk to human health and the environment, and that a letter of final concurrence should be issued for this site.

Brandy L. Maxfield
Coordinator
PST Responsible Party Remediation Section, Team III

BLM/blm
92195.iom

INCIDENT CLOSURE SUMMARY CHECKLIST

LPST ID 092195 NAME: Capital Wire & Cable

FAC ID 0019699

CITY Plano COUNTY Collin PRIORITY: 4

REGION: 04

SITE INFORMATION

CURRENT USE: ☐ STATION ☐ RESIDENTIAL ☒ UNKNOWN ☐ OTHER _____

☐ COMMERCIAL / INDUSTRIAL _____

STATUS: ☐ ACTIVE ☐ INACTIVE ☐ ABND/VACANT ☐ DEMOLISHED

FUTURE USE: ☐ STATION ☐ COM/IND _____ ☐ RES ☐ VACANT ☒ UNK ☐ OTHER _____

TANKS/EQUIPMENT: ☐ ACTIVE ☒ REMOVED ☐ ABND-IN-PLACE

IMPERVIOUS COVER OVER SITE? ☐ NO ☐ YES ☐ 25-75% ☐ 75-100%

ANY BUILDINGS? ☐ NO ☐ IN USE ☐ VACANT

RELEASE INFORMATION

DATE RPT'D: 7-8-88 ☒ TANK REMOVAL ☐ REPAIRS ☐ ASSESSMENT ☐ REL DET

TYPE: ☒ GASOLINE ☐ DIESEL ☐ WASTE OIL ☐ HYDR OIL ☐ OTHER

SOURCE: ☐ UST ☐ AST ☐ LINE ☐ DISPENSER ☒ SPILL/OVERFILL ☐ OTHER _____

AMOUNT: _____ gallons ☒ UNKNOWN RELEASE ABATED? ☒ YES ☐ NO

CONFIRMED (i.e. tanks removed, tightness test, etc)? _____

REMOVAL INFORMATION

TANKS/SIZE: 1. (1) 6,000-isopropyl alcohol tank 2. (1) 4,000-gal gasoline 3. (1) 8,000-gal gasoline 4. _____ 5. _____

DATE REMOVED: 1988 REMOVAL INSPECTED BY TNRCC? ☐ NO ☒ YES ☐ UNKNOWN

TANK CONDITION: ☒ UNKNOWN ☐ GOOD (no visible holes) ☐ FAIR ☐ POOR (holes observed)

VISIBLE CONTAMINATION? ☐ UNKNOWN ☐ NO ☒ YES

BACKFILL REMOVED? ☐ UNKNOWN ☐ NO ☒ YES _____ cu. yds MANAGED? ☐ NO ☐ YES

TANKHOLD OVER-EX? ☐ UNKNOWN ☐ NO ☒ YES _____ cu. yds MANAGED? ☐ NO ☐ YES

STOCKPILE CURRENTLY ONSITE? ☐ UNKNOWN ☒ NO ☐ YES _____ cu. yds

WATER IN TANKHOLD? ☐ UNK ☐ NO ☒ YES REMOVED? _____ gallons ☐ GW ☐ OTHER _____

REMARKS: _____

ASSESSMENT INFORMATION

TYPE: ☒ MSA ☐ LSA ☐ CSA ☐ RBA ☐ OTHER _____

CATEGORY GW: _____ MUNICIPAL WATER SUPPLY? ☐ NO ☒ YES

NUMBER OF BORINGS? 7 NUMBER OF EXISTING MWs? 0

RECEPTOR SURVEY: ☐ YES ☒ NO RECEPTORS W/I 500' ? ☐ YES ☐ NO ☐ UNK

UTILITIES AFFECTED? ☐ KNOWN ☐ UNKNOWN DEPTH: _____

ANY SCHOOLS, NURSING HOMES, ETC. W/I 500' ? ☐ UNKNOWN ☐ NO ☐ YES TYPE: _____

SURFACE WATERS, SPRINGS, SEEPS W/I 500' ? ☐ YES ☒ NO ☐ UNKNOWN

SENSITIVE HABITAT, WETLANDS W/I 500' ? ☐ NO ☒ YES TYPE: _____

WATER WELL SURVEY: ☐ YES ☒ NO

WATER WELLS WITHIN ONE-HALF MILE: No. _____ AVE. PRODUCING DEPTH: _____

WITHIN 1200' ? ☐ NO ☐ YES _____ WITHIN 500' ? ☐ NO ☐ YES _____

GRADIENT? ☐ UP ☐ DOWN GRADIENT? ☐ UP ☐ DOWN

ANY WELLS W/I 1,200' SCREENED IN AFFECTED ZONE? ☐ YES ☐ NO ☐ UNKNOWN

DEEPER ZONE PATHWAY? ☐ NO ☐ KNOWN ☐ PROBABLE ☐ POTENTIAL ☐ UNLIKELY

COMPLETION INFO? ☐ UNKNOWN ☐ YES ☐ NO

POTENTIAL VAPOR PROBLEMS? ☒ NO ☐ YES ☐ MEASURED ☐ CALCULATED

POTENTIAL DERMAL EXPOSURE? ☒ NO ☐ YES

REMARKS: _____

_____

GROUNDWATER

EST. DEPTH TO GW: N/A bgs PSH? ☐ NO ☐ YES ____ ft ☐ REMOVED _____ gallons

MAJOR AQUIFER? ☐ NO ☐ YES _____ MINOR? ☐ NO ☐ YES _____

CHARACTERISTICS: ☐ PERCHED ☐ CONFINED ☐ SEMI-CONFINED ☐ UNCONFINED

TDS: _____ ppm YIELD > 150 gpd: ☐ YES ☐ NO

PLUME DEFINED? VERTICAL: ☐ YES ☐ NO HORIZONTAL: ☐ YES ☐ NO

SIZE?: ☐ STABLE ☐ INCRSG ☐ DECRSG CONCENTRATION?: ☐ STABLE ☐ INCRSG ☐ DECRSG

PREDOMINANT GRADIENT DIRECTION: _____

OFF-SITE MIGRATION? ☐ NO ☐ KNOWN ☐ PROBABLE ☐ POTENTIAL ☐ UNLIKELY

REMARKS: _____

_____

LABORATORY ANALYSES

SOIL - REMOVAL

CONSTITUENT	MAX. BEFORE EXCAVATION	MAX. AFTER EXCAVATION	
BENZENE	_____ ppm	_____ ppm	_____
TOLUENE	_____ ppm	_____ ppm	_____
ETHYLBENZENE	_____ ppm	_____ ppm	_____
XYLENES	_____ ppm	_____ ppm	_____
TPH	_____ ppm	_____ ppm	_____

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES ☐ UNKNOWN

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES ☐ UNKNOWN

REMARKS: _____

SOIL - ASSESSMENT

	MAX. CONC.	DEPTH	BRG / MW	MAX. CONC.	DEPTH	DATE
BENZENE	non-detect ppm	_____	_____	_____ ppm	_____	_____
TOLUENE	_____ ppm	_____	_____	_____ ppm	_____	_____
ETHYLBENZENE	_____ ppm	_____	_____	_____ ppm	_____	_____
XYLENES	_____ ppm	_____	_____	_____ ppm	_____	_____
TPH	434 ppm	_____	B-	_____ ppm	_____	9-16-88

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES _____

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES _____

HAS VERTICAL EXTENT BEEN DETERMINED? ☐ NO ☐ YES _____ max depth

REMARKS: _____

N/A GROUNDWATER

CONSTITUENT	MAX. CONC.	MW	DATE	TIME FRAME
BENZENE	_____ ppm	_____	_____	_____
TOLUENE	_____ ppm	_____	_____	_____
ETHYLBENZENE	_____ ppm	_____	_____	_____
XYLENES	_____ ppm	_____	_____	_____
TPH	_____ ppm	_____	_____	_____

PAH ABOVE ACTION LEVELS? ☐ NO ☐ YES _____

PAH ABOVE CLEANUP LEVELS? ☐ NO ☐ YES _____

TOTAL No. MONITORING EVENTS? _____ CONC. DECREASING? ☐ NO ☐ YES

REMARKS: _____

Potential Immediate Exit Criteria Following Risk-Based Assessment
Single Sampling Event

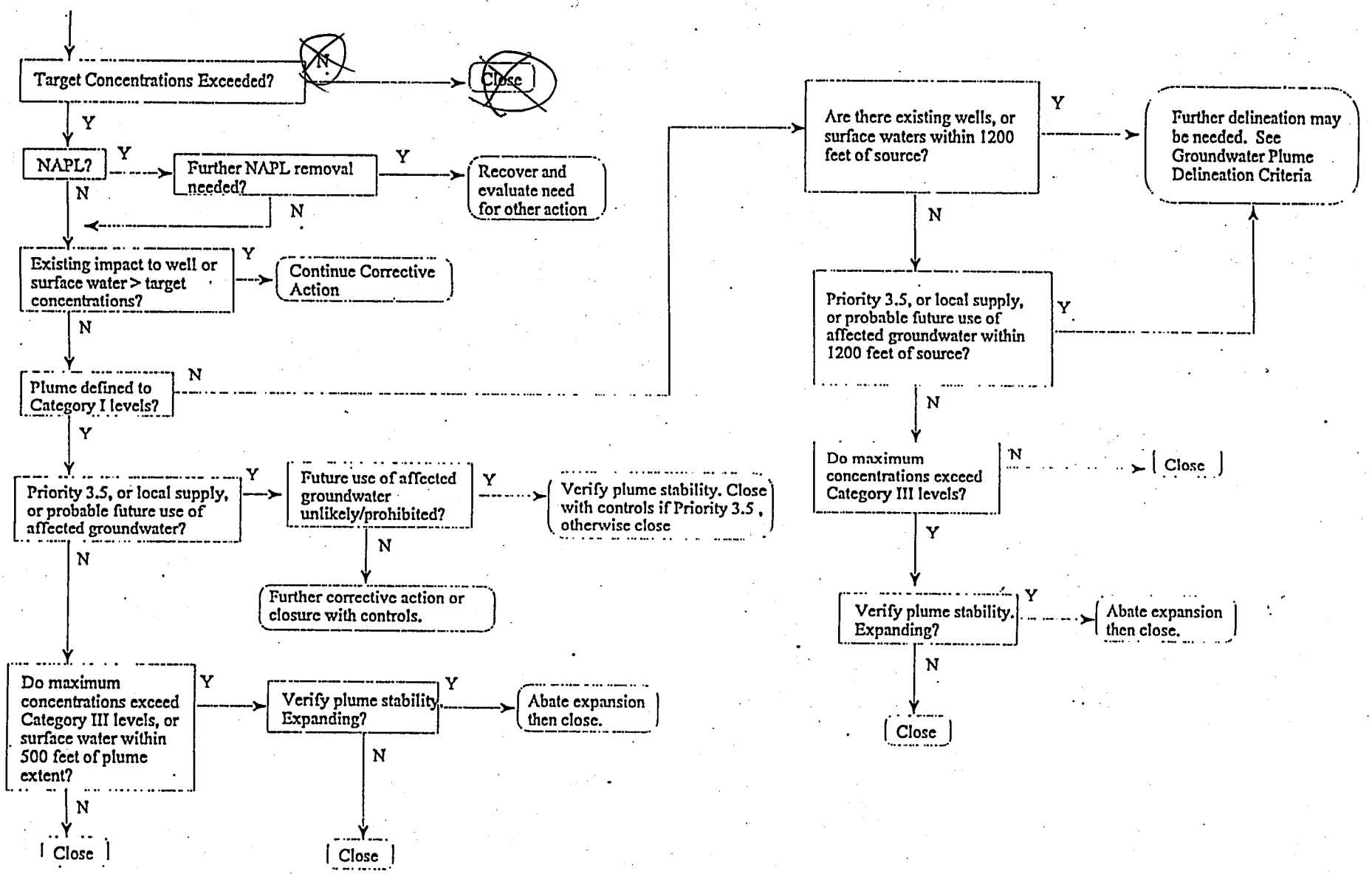
Soils Only Impact	Soils and Groundwater Impact	Target Soil Concentrations Met[a]		Target Groundwater Concentrations Met[a,c]	Historical Release[d]	No Wells Within	No Surface Waters Within[e]	Municipal Water Supply Available[f]	Priority
		Human Health	Soil-to-Groundwater[b]						
x		x	x						4.2
x		x			x	500 ft	500 ft	x	4.2
	x	x	x	x	x	500 ft	500 ft	x	4.1
	x	x	x	x	x	1200 ft	1200 ft	x	3.5[g]

a. No NAPL
b. Vertical delineation should be complete and appropriate, and demonstrate generally declining concentrations with depth. Additionally soil samples should be representative, and there should be no concerns regarding preferential pathways (e.g., fractured bedrock, karst).
c. Groundwaters must be Category I-III. If category IV groundwater, and Category III standards exceeded, then additional monitoring/evaluation warranted to ensure no other hazard.
d. Recent release could be considered if know of minor nature. Primarily considering sites which are likely static or declining conditions.
e. Groundwater/Surface Water interconnection should be likely.
f. The municipal supply is not the affected groundwater body.
g. Or local supply.

Figure 1

Groundwater Pathways (See also Figure 2)

N/A



NA

Figure 2

Groundwater Pathway - Groundwater Depth ≤ 15 Feet, or Within Typical Construction Depth

(Criteria for Figure 1 must also be met)

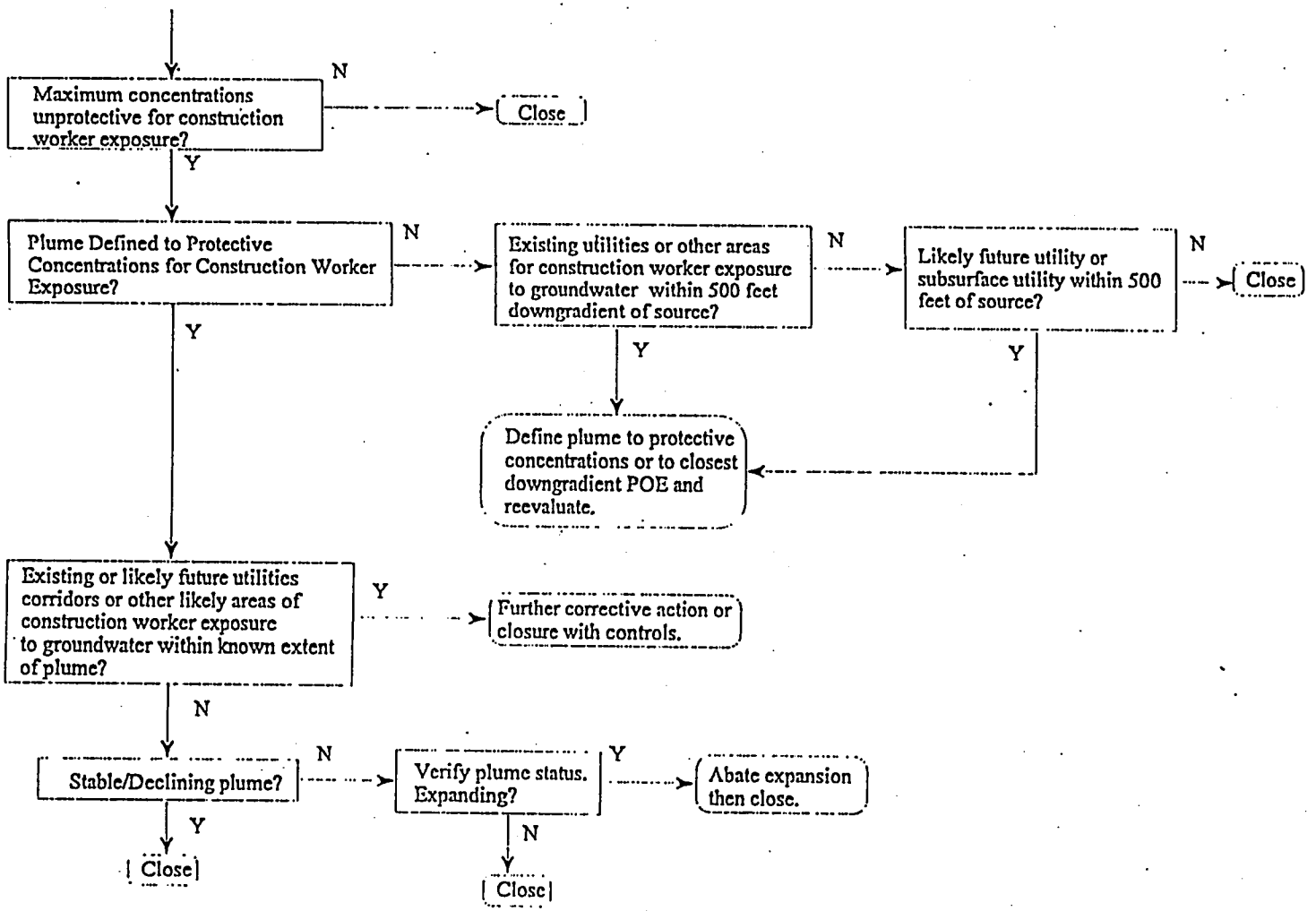


Figure 3

Soils Pathways

Evaluate all three pathways

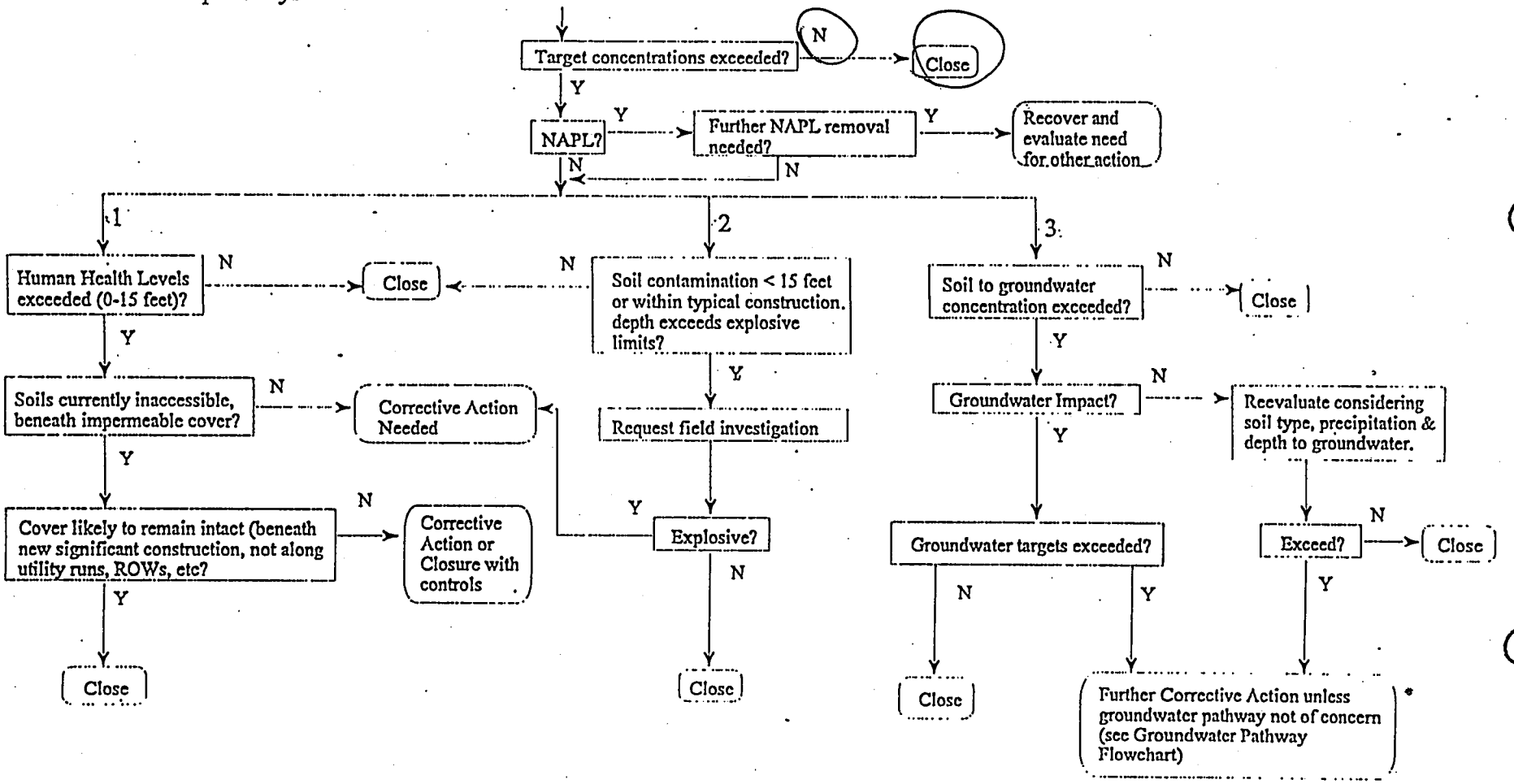
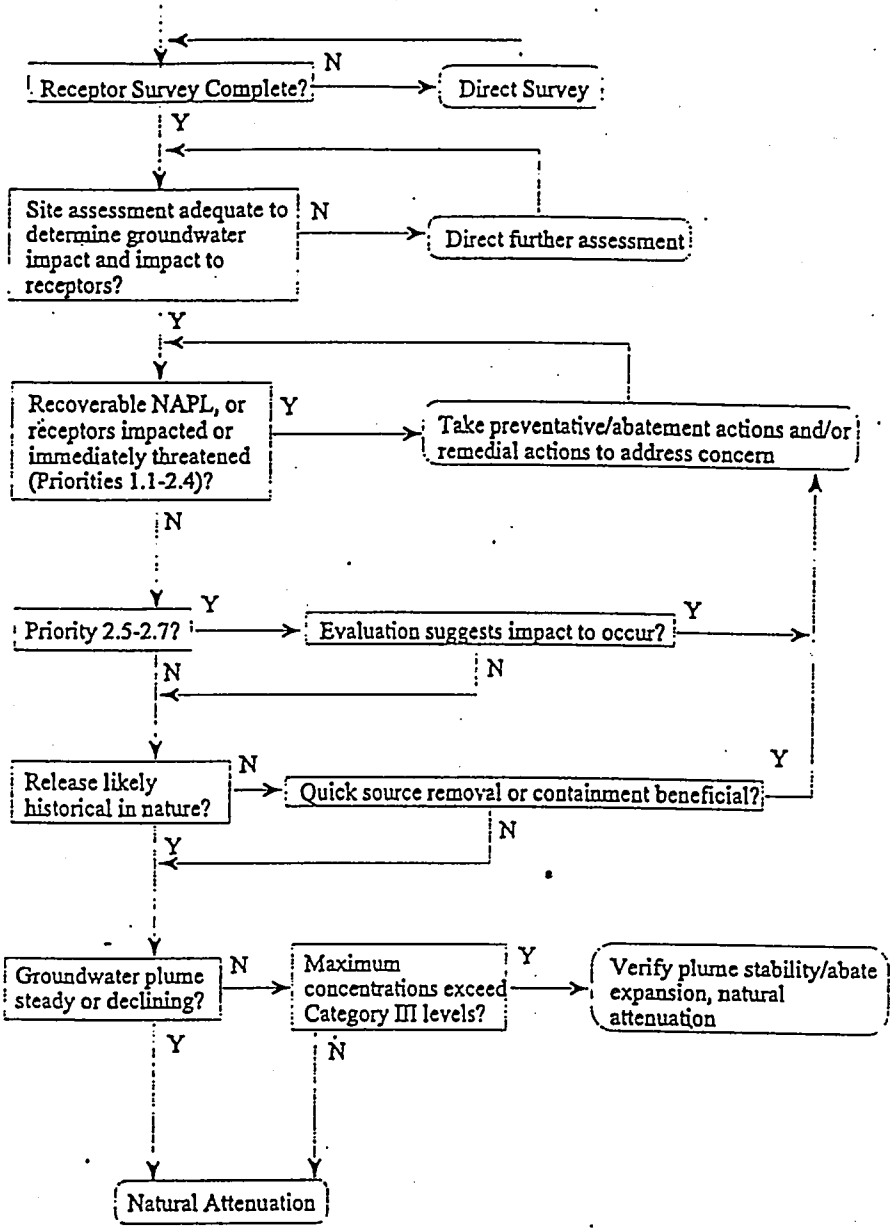


Figure 4

Criteria for Natural Attenuation Preference
Petroleum Hydrocarbon LPST Groundwater Sites



Groundwater Plume Delineation Criteria

	Groundwater Scenario	Delineation Extent
1	Existing water supply well within 1200 feet of source area.	Define to POE; or to 1 order of magnitude less than Plan A Category I level or PQL, whichever is greater concentration. Verify plume stability.
2	Priority 3.5 or local supply, or 0.5 mile water well survey indicates an existing water supply well downgradient beyond 1200 feet	Use modeling to project concentration at 1200 feet. Confirm stable or declining trend. Modeling result should not exceed Plan A Category I concentrations.
3	Probable future groundwater use within 500 feet.	Define to Plan A Category I levels. Verify plume stability.
4	Surface water within 1200 feet downgradient of source	Define to POE, or to surface water criteria. Modeling evaluation could be conducted to demonstrate protective concentrations at lesser distance. Verify plume stability. (If plume defined to Plan A Category I levels, further delineation may be unwarranted unless judge potential for impact to surface water.)
5	Groundwater ≤ 15 feet deep or within typical construction depth and existing utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
6	Groundwater ≤ 15 feet deep or within typical construction depth and likely future utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
7	No existing receptors within 1200 feet of source and no likely future receptors within 500 feet of source.	Accept delineation to Plan A Level Category III level as adequate. When plume is not defined to Plan A Category III criteria, then sufficient downgradient definition should exist to show declining concentrations with distance from source. When maximum on-site concentrations exceed Category III levels, verify plume stability.
8	Fractured Bedrock or Karst Environments	Focus primarily on protection to receptors (possible monitoring likely receptors). Delineation should be attempted to Category I levels (unless an unused source), and abate source area as possible.
9	Other Exposure Pathways (groundwater to indoor air, explosive concentrations).	When these issues are of concern at sites, then delineation to protective concentrations for these pathways should occur.

Criteria for Likely Future Receptor:

Groundwater Use:
Priority 3.5 or local water supply (Note: local supply is indicated if water well survey indicates routine use of the affected groundwater body)
No Prohibitions on Use
Residential Area, particularly rural
Absence of municipal supply

Assume 5 year benzene half life.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

November 7, 1996

Protecting Texas by Reducing and Preventing Pollution

CERTIFIED MAIL - RCT # - P 121377536

JAMES F HOLLOWAY
CAPITAL WIRE AND CABLE
910 10TH ST. PO BOX 7
PLANO, TX 75074

Re: Subsurface release of hydrocarbons at the Capital Wire & Cable facility located at
900 Ave F, Plano, Tx 75074
LPST-ID: 092195

Dear Mr. Holloway:

Our records indicate that, as of October 31, 1996, we had not yet received a new corrective action report as requested in our September 1995 letter regarding this site. If you have responded to our letter, please contact us to verify receipt of your report as we may have received your response after October 31st. Please note that the referenced corrective action report is not the *Site Activation Reply (SAR)form* which we have received from you. If you think your site has been closed, please send a copy of the closure letter issued to you on this site. If you have not responded since you submitted the SAR, please review the information contained in the September 1995 package and contact a registered Corrective Action Specialist to initiate the necessary activities. Please note that the due date for the report of activities, not just the proposal, was 07/01/1996. Also, please realize that if you do not schedule work with a Corrective Action Specialist very soon, you may not be able to meet the PSTR Fund reimbursement deductible deadlines set forth in House Bill 2587.

If no written response is received within 30 days from the date of this letter, you will be considered "unwilling" to perform corrective action pursuant to the Texas Water Code Section 26.351© and we will have no alternative but to refer this case for enforcement. Please note that we may also refer this case to our State-Lead Remediation Section for necessary corrective action. As an unwilling party, State-Lead corrective action costs for your site are subject to cost recovery. Please be aware that entering the State Lead program does not relieve the owner or operator of third-party liability, nor does it allow the owner or operator to schedule or administer the corrective action activities at the site.

This will be your only notice, so please contact us so that we can work with you to resolve this matter. We appreciate your cooperation. Should you have any questions, please contact the Responsible Party Investigations and Responsible Party Remediation Sections at 512/239-2200.

Sincerely,

AERozypal

Danny Li

Anton Rozsypal, P.E.
Manager, Responsible Party Investigations Section
Petroleum Storage Tank Division

Danny Lien, P.E.
Manager, Responsible Party Remediation Section
Petroleum Storage Tank Division

cc: Sam Barrett, TNRCC 04 Field Office
Jackie Hardee, PST State Lead Remediation Section
David Bower, Enforcement Division
Ray Winter, Attorney, Litigation Support Division

P 1[illegible] 377 5[illegible]6

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail *(See reverse)*

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	92195

PS Form **3800**, April 1995

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

November 7, 1996 *Protecting Texas by Reducing and Preventing Pollution*

CERTIFIED MAIL - RCT # - P 121377536

JAMES F HOLLOWAY
CAPITAL WIRE AND CABLE
910 10TH ST. PO BOX 7
PLANO, TX 75074

Re: Subsurface release of hydrocarbons at the Capital Wire & Cable facility located at
900 Ave F, Plano, Tx 75074
LPST-ID: 092195

Dear Mr. Holloway:

Our records indicate that, as of October 31, 1996, we had not yet received a new corrective action report as requested in our September 1995 letter regarding this site. If you have responded to our letter, please contact us to verify receipt of your report as we may have received your response after October 31st. Please note that the referenced corrective action report is not the *Site Activation Reply (SAR)form* which we have received from you. If you think your site has been closed, please send a copy of the closure letter issued to you on this site. If you have not responded since you submitted the SAR, please review the information contained in the September 1995 package and contact a registered Corrective Action Specialist to initiate the necessary activities. Please note that the due date for the report of activities, not just the proposal, was 07/01/1996. Also, please realize that if you do not schedule work with a Corrective Action Specialist very soon, you may not be able to meet the PSTR Fund reimbursement deductible deadlines set forth in House Bill 2587.

If no written response is received within 30 days from the date of this letter, you will be considered "unwilling" to perform corrective action pursuant to the Texas Water Code Section 26.351© and we will have no alternative but to refer this case for enforcement. Please note that we may also refer this case to our State-Lead Remediation Section for necessary corrective action. As an unwilling party, State-Lead corrective action costs for your site are subject to cost recovery. Please be aware that entering the State Lead program does not relieve the owner or operator of third-party liability, nor does it allow the owner or operator to schedule or administer the corrective action activities at the site.

This will be your only notice, so please contact us so that we can work with you to resolve this matter. We appreciate your cooperation. Should you have any questions, please contact the Responsible Party Investigations and Responsible Party Remediation Sections at 512/239-2200.

Sincerely,

AERozypal

Anton Rozsypal, P.E.
Manager, Responsible Party Investigations Section
Petroleum Storage Tank Division

Danny Lien, P.E.
Manager, Responsible Party Remediation Section
Petroleum Storage Tank Division

cc: Sam Barrett, TNRCC 04 Field Office
Jackie Hardee, PST State Lead Remediation Section
David Bower, Enforcement Division
Ray Winter, Attorney, Litigation Support Division

CLOSURE ASSESSMENT FOR STALE FILES (Internal Or) Date of Assessment_____

LPST #_____ Priority_____ Facility ID#_____

County_____ TNRCC Region____ Date of Release_____ Date of 1st TNRCC Rpt_____

RP Address_____ Site Address_____

_____ _____

_____ _____

_____ _____

☐Soil Only ☐Soil & GW _____% Impervious Cover

Type of release: Line:____ Tank_____ Hydr Lift_____ Other_____

Substance released: Gas__ Diesel__ W/ Oil__ Hydr Fluid__ Other__

FINAL SOIL LEVELS: Tankpit____ Line____ Other_____

Maximum benzene BDL Depth_____ Date_____

Maximum Total BTEX BDL Depth_____ Date_____

Maximum TPH 434 Depth_____ Date 9-16-1988

PAH Yes___ No___ All Constituents Below Plan A Yes___ No____

Final disposition of excavated soils:

Landfilled: _____ Returned to Excavation: _____ Stockpiled soils on-site_____

Benzene _____	Benzene _____	Benzene _____
Total BTEX _____	Total BTEX _____	Total BTEX _____
TPH _____	TPH _____	TPH _____

BORINGS: Yes___ No___ How Many_____ Date_____ ____Re-Sample Data

Maximum benzene_____ Depth_____ Date_____ _____

Maximum Total BTEX_____ Depth_____ Date_____ _____

Maximum TPH_____ Depth_____ Date_____ _____

PAH Yes___ No___ All Constituents Below Plan A Yes____ No_____

Groundwater Impacted:___Yes __No; GW Depth_____;GW TDS_____Category I__II__III__IV__

WATER WELL SURVEY: ☐YES ☐NO

WATER WELLS WITHIN ONE-HALF MILE: No._____ AVE. PRODUCING DEPTH: _____

WITHIN 1200' ? ☐NO ☐YES_____ WITHIN 500' ? ☐NO ☐YES_____

GRADIENT? ☐UP ☐DOWN GRADIENT? ☐UP ☐DOWN

ANY WELLS W/I 1,200' SCREENED IN AFFECTED ZONE? ☐YES ☐NO ☐UNKNOWN

RECEPTOR SURVEY: ☐YES ☐NO RECEPTORS W/I 500' ? ☐YES ☐NO ☐UNK

UTILITIES AFFECTED? ☐KNOWN ☐UNKNOWN DEPTH:_____

ANY SCHOOLS, NURSING HOMES, ETC. W/I 500' ? ☐UNKNOWN ☐NO ☐YES TYPE:_____

SURFACE WATERS, SPRINGS, SEEPS W/I 500' ? ☐YES ☐NO ☐UNKNOWN

SENSITIVE HABITAT, WETLANDS W/I 500' ? ☐NO ☐YES TYPE:_____

REMARKS:_____

_____

_____

Closure: Yes:___ No:___ CADD: FAR Type_____ RBA Type_____

_____

_____

_____

_____

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

November 10, 1998

CERTIFIED MAIL - Z 435652284

MR. JAMES F HOLLOWAY
CAPITAL WIRE AND CABLE
910 10TH ST. PO BOX 7
PLANO, TX 75074

Re: Subsurface release at the CAPITAL WIRE & CABLE facility located at 900 AVE F , PLANO (Collin County), Texas
(LPST ID No. 092195 PST Facility No. 0019699)

Dear Mr. James F Holloway:

This letter is to inform you that your response to the Texas Natural Resource Conservation Commission (TNRCC) letters, as required by Title 30 Texas Administrative Code (TAC), Section 334.77-334.81, has not been received. Our records indicate that you are the responsible party for the above-referenced Leaking Petroleum Storage Tank (LPST) site, and that additional corrective actions may be necessary at this site. At this time, you are requested to contact an environmental consultant who is registered as a Corrective Action Specialist (CAS) to evaluate your site to determine the appropriate phase of corrective action. Please note that the TNRCC requires written approval for all corrective action activities prior to initiation in order for reimbursement claims for those activities to be processed in the order received. If you are seeking reimbursement, a workplan and cost proposal must be submitted for review and preapproval prior to initiation of any activity. If you have submitted a proposal, a report, or a site closure request within the past 14 days, please disregard this letter.

If you can demonstrate that you are not the responsible party or the primary point of contact for this site, please include the correct responsible party name and phone number in your response to this Office. However, if you believe that you are financially unable to proceed with corrective actions, please complete and return the attached **PST State Lead Remediation Program Financial Ability Determination Information** packet to the PST Responsible Party Remediation Section.

At this time you are requested to express your intentions to address the above-referenced incident. Your response must be submitted to this Office no later than 30 days from the date of this letter. Your failure to respond within the requested time frame is a violation of Title 30 TAC Chapter 334. Further delays in responding to this Office will result in the initiation of formal enforcement actions against you. **The LPST and Facility ID Numbers should be included on all correspondence.**

Should you have any questions, please contact the PST Responsible Party Remediation Section at 512/239-5055. Your prompt attention to this matter will be appreciated.

Sincerely,

Alan R. Batcheller

Alan R. Batcheller, Manager
PST Responsible Party Remediation Section
Remediation Division

092195.nrp
Enclosure

LPST SITE ACTIVATION REPLY

Use this form to indicate your choice of options for continuation of corrective action. Please submit the completed form and all attachments to the TNRCC PST Division in Austin and to the appropriate TNRCC Region Office (exclude financial information). FAILURE TO COMPLETE AND RETURN THIS FORM WILL BE VIEWED AS NON-COMPLIANCE. (PLEASE RETURN COMPLETED FORM BY NOVEMBER 1, 1995.)

LPST-ID # : 092195 CASE PRIORITY: 4A SOIL CONTAMINATION ONLY, REQUIRES FULL SITE ASSESSMENT &
RP NAME: Capital Wire And Cable
ADDRESS: 910 10th St. P.O. Box 7 , Plano, TX 75074-
CONTACT: Mr. Phil Pringle PHONE (214)423-6565 FAX ( ) -
FAC NAME: Capital Wire & Cable
ADDRESS: 900 Ave F , Plano, TX 75074-
CONTACT: PHONE ( ) - FAX ( ) -

OPTION 1 CORRECTIVE ACTION REPORTS MUST BE SUBMITTED TO THE TNRCC BY: March 1, 1996

☐ a) I am proceeding with corrective action and understand that my case is eligible for reimbursement and will submit the appropriate report(s) by the deadline listed above.

☐ b) I am proceeding with corrective action, and understand that my case is not eligible for reimbursement. The appropriate reports will be submitted by the deadline listed above.

OPTION 2

☐ I believe that I am financially unable to perform the necessary corrective action at this site. Enclosed is the documentation required to review my financial qualification for the State Lead Remediation program. (Please check all items which are included with this form.)

Individual/sole proprietor | Corporate/partnership

__ Affidavit of Financial Inability | __ Affidavit of Financial Inability
__ Tax returns - most recent filing year | __ Tax returns - most recent filing year
__ TNRCC personal financial statement | __ Signed Access Agreement and Release
__ Signed Access Aggreement and Release

Please explain why any of the listed documentation was not included in this packet:

Please list the LPST ID#s of any other active (not closed) LPST sites which you are responsible for addressing:

OPTION 3

☐ This individual/company is not the primary point of contact for corrective action at this site. The following individual/company is the primary point of contact for corrective action at this site:

RP NAME:
ADDRESS:
CITY: STATE: ZIP: -
CONTACT:
PHONE: ( ) - FAX: ( ) -
COMMENTS:

This form was completed by:

Print Name Title

RP NAME
ADDRESS:
Signature Date
CONTACT: PHONE: FAX:
COMMENTS:

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 1, 1995

Dear Responsible Party:

Our records indicate that you are the responsible party contact for an inactive Leaking Petroleum Storage Tank (LPST) site which has not yet completed all of the corrective action requirements for site closure. Recent legislative action has resulted in changes to the PST program which may directly impact you based upon the status of your LPST case.

House Bill 2587

The Texas Legislature passed House Bill 2587 in the previous legislative session. This bill:

- provides additional funding for the Petroleum Storage Tank Remediation (PSTR) Fund,
- sets a December 31, 1995 deadline for known tanks to be registered to remain eligible for reimbursement, and
- sets up a new reimbursement deductible scale which is based upon the dates that certain corrective action reports are received/ approved by the TNRCC.

Please refer to the *Legislative Action Alert* enclosure for information regarding other highlights of House Bill 2587. Proposed rules to implement the legislation were published in the July 18, 1995 issue of the *Texas Register*; the final rules will be published this Fall.

Activation of Your LPST Case

For the past 2-1/2 years, a responsible party has had the option to postpone corrective action until reimbursement could be made in a reasonable time frame. Since additional funding has been provided to the PSTR Fund, responsible parties no longer have the option to defer corrective action activities at LPST sites. All LPST cases are now considered "active" and all financially-able responsible parties are now required to proceed. This activation letter supercedes the TNRCC "termination," "suspension," and "clarification" letters dated October 23, 1992, November 10, 1992, and December 28, 1992, respectively.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

Site Assessment

At this time, the TNRCC's primary goal is to ensure that a "site assessment" is performed at as many LPST sites as possible by December 23, 1996. If a "site assessment" report for an LPST site is not received by the TNRCC by this deadline, a responsible party's deductible amount will double for that particular LPST site. "Site assessment" components are outlined in Title 30, Texas Administrative Code (TAC), §334.78 of the proposed rules. These include the determination of:

- the risk-based priority of the case,
- the degree and extent of onsite contamination in the soil and groundwater,
- whether there are any sensitive receptors (such as water supply wells), and
- whether the case can be closed at this time.

New site assessment guidelines replacing the current Limited Site Assessment guidelines will be mailed to registered Corrective Action Specialists (CAS) in September 1995; if no site assessment activities have been performed at your site, the new process should be applied once it is available.

Responsible Party-Lead Program

The LPST case referenced on the enclosed *Site Activation Reply* is presently in the Responsible Party-Lead program. Please refer to the *Responsible Party-Lead Packet*. In this packet you will find a CAS list. At this time, we request that you contact a registered CAS to evaluate the status of your LPST site by reviewing all technical data and subsequently preparing a proposal for the next appropriate corrective action activities. With the exception of emergency, initial abatement activities and phase-separated product recovery, we recommend that all corrective action activities be preapproved by the TNRCC prior to initiation of the activity. Please note that after September 1, 1995, your claim for reimbursement for activities that were not preapproved will be processed only after all other claims for preapproved work are processed and paid.

If your LPST site is not eligible for reimbursement from the PSTR Fund, you are requested to proceed with corrective action activities in accordance with TNRCC rules and guidelines; submittal of a workplan and cost proposal is not required. If you have questions regarding eligibility, please consult 30 TAC, Chapter 334, Subchapter H.

There is a site-specific deadline shown on the enclosed *Site Activation Reply* form which indicates the date that your report for the next required corrective action activity is due. (This deadline is based upon the location and current priority designation of your LPST case.)

If you plan to submit a proposal for TNRCC preapproval, we recommend that your proposal be submitted at least 30 days before the date you wish to start work to allow us adequate time for proposal review. To assist you and your CAS in determining the next appropriate corrective action activities for your LPST site, a *Recommended Action Table* is enclosed in the *Responsible Party-Lead Packet*. Please refer to the enclosed list of *Petroleum Storage Tank Division Pamphlets* for available guidance material and reporting forms.

As the responsible party, you are responsible to pursue whatever actions are necessary to minimize any imminent impacts or threats to human health and safety and to stabilize the conditions caused by this release. If phase-separated product is present, you are directed to notify this office and immediately implement a recovery program which continuously and effectively removes the product to the maximum extent practicable.

State-Lead Program

If you are financially unable to proceed with corrective action, please refer to the *State-Lead Packet* and review the general information regarding the program. Before a financial review can be conducted to determine your eligibility for the State-Lead Program, all required documentation must be submitted.

If you are considering applying for the State-Lead Program, but believe that your site is near closure, you may wish to consult with a registered CAS to obtain an estimate of the amount of work required, and the projected cost, to complete the necessary actions. You may find that you are able to finance the remaining corrective action and submit a claim for reimbursement of the costs.

Additionally, if you can afford to complete the "site assessment" requirements referenced above, you will be required to do so prior to entering the State-Lead Program. Therefore, please consider the possible impacts to your deductible amount which may result from any delays in completing these requirements.

Site Activation Reply

To acknowledge site activation, we request that the enclosed *Site Activation Reply* be completed and returned to the TNRCC by November 1, 1995. To indicate your intent to proceed, please check Option 1a (if eligible for reimbursement) or Option 1b (if ineligible for reimbursement). If you believe that you are financially unable to proceed and would like to be considered for State-Lead, please check Option 2 and attach all required documentation. We request that you allow the TNRCC at least 30 days to process your financial information. If you can demonstrate that you are not the proper primary point of

contact for the referenced LPST incident, select Option 3 and provide the required information for the responsible party. Please note that any delays resulting from responsible party determination issues may ultimately impact the LPST case deductible amount. With the exception of financial documentation, a copy of any correspondence should also be submitted to the appropriate TNRCC Region Field Office.

Frequently Asked Questions

We realize that you may have questions regarding this matter. We have tried to anticipate some of the possible questions and have included a *Frequently Asked Questions* enclosure to answer common corrective action questions. Because we are issuing approximately 4,000 of these letters simultaneously, we request that you please consult these *Frequently Asked Questions* for answers to your initial questions. If you have any additional questions regarding this letter, please contact the Responsible Party Remediation Section at 512/239-2200. Please be sure to reference this case activation letter and your LPST ID Number when you call or write to the TNRCC. We will be expecting your *Site Activation Reply* by November 1, 1995 and the report for the next appropriate actions by the deadline shown on the form. Thank you for your patience and cooperation in assisting us with the activation of your case.

Sincerely,

Chet Clarke

Chet Clarke, Manager
Responsible Party Remediation Section
Petroleum Storage Tank Division

Enclosures:
1) *Legislative Action Alert*
2) *Site Activation Reply*
3) *Frequently Asked Questions*
4) *Responsible-Party Lead Packet*
5) *State-Lead Packet*

RECEIVED
NOV 18 1996
TNRCC/PST
RPR

092195

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

James F Holloway
Capital Wire And Cable
910 10th St. PO Box 7
Plano, TX 75074 -
LPST: 092195 RCT # P 121 377536

4a. Article Number

4b. Service Type
☐ Registered ☐ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery 11-12-96

5. Received By: *(Print Name)*

6. Signature: *(Addressee or Agent)*
X [signature]

8. Addressee's Address *(Only if requested and fee is paid)*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

092195

Z 435 652 284

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided
Do not u 092195.nrp

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

LAST #92195

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 8-24-88

REPORT NUMBER: 88-8983
REPORT DATE: 9-2-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 8983

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	120 mg/kg

*Method 418.1 by Infrared Spectroscopy

Results given to Phil Pringle 9/2/88 via telephone.

NDRC Laboratories, Inc. David R Godwin

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 8-24-88

REPORT NUMBER: 88-8983
REPORT DATE: 9-2-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 8983

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Gas Chromatography Analysis:		
Benzene	1.0 mg/kg	< 1.0 mg/kg
Toluene	1.0 mg/kg	4.2 mg/kg
Xylenes	1.0 mg/kg	< 1.0 mg/kg
Ethyl Benzene	1.0 mg/kg	< 1.0 mg/kg

Results given to Phil Pringle 9/2/88 via telephone.

NDRC Laboratories, Inc. David R. Godwin

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 8-24-88

REPORT NUMBER: 88-8984
REPORT DATE: 9-2-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 8984

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Gas Chromatography Analysis:		
Benzene	1.0 mg/kg	< 1.0 mg/kg
Toluene	1.0 mg/kg	3.3 mg/kg
Xylenes	1.0 mg/kg	< 1.0 mg/kg
Ethyl Benzene	1.0 mg/kg	< 1.0 mg/kg

Results given to Phil Pringle 9/2/88 via telephone.

NDRC Laboratories, Inc. David R. Godwin

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 8-24-88

REPORT NUMBER: 88-8984
REPORT DATE: 9-2-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 8984

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	130 mg/kg

*Method 418.1 by Infrared Spectroscopy

Results given to Phil Pringle 9/2/88 via telephone.

NDRC Laboratories, Inc. David R. Godwin

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

DATE RECEIVED: 9-16-88

REPORT NUMBER: 88-10046
REPORT DATE: 9-27-88

SAMPLE SUBMITTED BY: Capital Wire and Cable
ADDRESS: 950 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Soil
IDENTIFYING MARKS: ----

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Gas Chromatography Analysis: (By Method 8020)		
Benzene	2.0 mg/kg	< 2.0 mg/kg
Toluene	2.0 mg/kg	< 2.0 mg/kg
Xylenes	2.0 mg/kg	< 2.0 mg/kg
Ethyl Benzene	2.0 mg/kg	< 2.0 mg/kg

Results given 9/27/88 via telephone.

NDRC Laboratories, Inc. David R. Godwin

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

DATE RECEIVED: 9-16-88

REPORT NUMBER: 88-10046
REPORT DATE: 9-27-88

SAMPLE SUBMITTED BY: Capital Wire and Cable
ADDRESS: 950 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Soil
IDENTIFYING MARKS: ----

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	434 mg/kg

*Method 418.1 by Infrared Spectroscopy

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

DATE RECEIVED: 9-28-88

REPORT NUMBER: 88-10550
REPORT DATE: 10-11-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 9-28-88

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Gas Chromatography Analysis:		
Benzene	1.0 mg/kg	< 1.0 mg/kg
Toluene	1.0 mg/kg	< 1.0 mg/kg
Xylenes	1.0 mg/kg	< 1.0 mg/kg
Ethyl Benzene	1.0 mg/kg	< 1.0 mg/kg

Results given to Mr. Pringle 10/10/88 via telephone.

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

DATE RECEIVED: 9-28-88

REPORT NUMBER: 88-10550
REPORT DATE: 10-11-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: 9-28-88

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	215 mg/kg

*Method 418.1 by Infrared Spectroscopy

Results given to Mr. Pringle 10/10/88 via telephone.

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

NDRC LABORATORIES, INC.
ENVIRONMENTAL LABORATORY REPORT

EPA METHOD 8020
AROMATIC VOLATILE ORGANICS

DATE RECEIVED: 10-20-88

REPORT NUMBER: 88-11451
REPORT DATE: 10-28-88

SAMPLE SUBMITTED BY: Capital Wire and Cable
ADDRESS: 910 East 10th Street
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Solid
IDENTIFYING MARKS: Soil 4

Results given to Phil Pringle 10/28/88 via telephone.

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland , Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

ENVIRONMENTAL LABORATORY REPORT

EPA METHOD 8020
AROMATIC VOLATILE ORGANICS

PARAMETER	DETECTION LIMIT (µg/kg)	**	AMOUNT DETECTION (µg/kg)
Benzene	2.0	.....	< 2.0
Chlorobenzene	2.0	.....	< 2.0
1,2-Dichlorobenzene	2.0	.....	< 2.0
1,3-Dichlorobenzene	2.0	.....	< 2.0
1,4-Dichlorobenzene	2.0	.....	< 2.0
Ethylbenzene	2.0	.....	< 2.0
Toluene	2.0	.....	44
Total Xylenes	2.0	.....	8.4

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Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437 • FAX (713) 644-9160

NDRC LABORATORIES, INC.
ENVIRONMENTAL LABORATORY REPORT

ORGANIC ANALYSIS FOR
EPA METHOD 8020

Organic compounds currently considered Priority Pollutants were analyzed at NDRC Laboratories, Inc. following the EPA Method 8020 for Gas Chromatography-Flame Ionization Detector.

Quality Control records of sample custody, handling and preparation are maintained as per EPA guidelines. Daily laboratory blanks as well as calibration checks are performed in compliance with EPA Quality Control and Method requirements.

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

LPST SITE ACTIVATION REPLY

RECEIVED
NOV 09 1995
RCC/PST
RRR

SAR ✓

Use this form to indicate your choice of options for continuation of corrective action. Please submit the completed form and all attachments to the TNRCC LPST Division RRR in Austin and to the appropriate TNRCC Region Office (exclude financial information). FAILURE TO COMPLETE AND RETURN THIS FORM WILL BE VIEWED AS NON-COMPLIANCE. (PLEASE RETURN COMPLETED FORM BY NOVEMBER 1, 1995.)

LPST-ID # : 092195 CASE PRIORITY: 4A SOIL CONTAMINATION ONLY, REQUIRES FULL SITE ASSESSMENT &
RP NAME: Capital Wire And Cable
ADDRESS: 910 10th St. P.O. Box 7 , Plano, TX 75074-
CONTACT: ~~Mr. Phil Pringle~~ JAMES F. HOLLOWAY PHONE (214)423-6565 FAX (214)426-6146
FAC NAME: Capital Wire & Cable
ADDRESS: 900 Ave F , Plano, TX 75074-
CONTACT: PHONE ( ) - FAX ( ) -

OPTION 1 CORRECTIVE ACTION REPORTS MUST BE SUBMITTED TO THE TNRCC BY: July 1, 1996

☒ a) I am proceeding with corrective action and understand that my case is eligible for reimbursement and will submit the appropriate report(s) by the deadline listed above.

☐ b) I am proceeding with corrective action, and understand that my case is not eligible for reimbursement. The appropriate reports will be submitted by the deadline listed above.

OPTION 2

☐ I believe that I am financially unable to perform the necessary corrective action at this site. Enclosed is the documentation required to review my financial qualification for the State Lead Remediation program.(Please check all items which are included with this form.)

Individual/sole proprietor

__ Affidavit of Financial Inability
__ Tax returns - most recent filing year
__ TNRCC personal financial statement
__ Signed Access Aggreement and Release

Corporate/partnership

__ Affidavit of Financial Inability
__ Tax returns - most recent filing year
__ Signed Access Agreement and Release

Please explain why any of the listed documentation was not included in this packet:

Please list the LPST ID#s of any other active (not closed) LPST sites which you are responsible for addressing:

OPTION 3

☐ This individual/company is not the primary point of contact for corrective action at this site. The following individual/company is the primary point of contact for corrective action at this site:

RP NAME:
ADDRESS:
CITY: STATE: ZIP: -
CONTACT:
PHONE: ( ) - FAX: ( ) -
COMMENTS:

This form was completed by:

JAMES F. HOLLOWAY — Print Name
PROC. ENG. MGR. — Title
James F Holloway — Signature
10-25-95 — Date

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

LPST #92195
GAS TANK
SOIL

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. N/A	Manifest Document No. 03275	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Capital Wire and Cable
910 10th Street
Plano, Texas 75074
4. Generator's Phone (214) 423-6565

A. State Manifest Document Number NO 00103295
B. State Generator's ID N/A

5. Transporter 1 Company Name: BFI
6. US EPA ID Number: N/A
C. State Transporter's ID N/A
D. Transporter's Phone (214) 225-8151

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
BFI Hutchins Landfill
[illegible]
Hutchins, Tx 75141
10. US EPA ID Number: N/A
G. State Facility's ID N/A
H. Facility's Phone (214) 225-8151

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Waste Soil	001	CM	00100	Y	290490
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
Ref. No. 48360
C/Class II Non-Hazardous

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	4	4	89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year
Henry L. Miller, BFI	[signature]	04	04	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year

TWC 0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A — Manifest Document No. [illegible]

2. Page 1 of

Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: TX 00103314

3. Generator's Name and Mailing Address: Capitol Wire and Cable [illegible] Plano, TX 75074

4. Generator's Phone (214) 423-6565

B. State Generator's ID: N/A

5. Transporter 1 Company Name: BFI

6. US EPA ID Number: N/A

C. State Transporter's ID: N/A

D. Transporter's Phone: 214-[illegible]-8151

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: BFI Hutchins Landfill, 450 East Cleveland Rd., Hutchins, TX 75141

10. US EPA ID Number: N/A

G. State Facility's ID: N/A

H. Facility's Phone: (214) 225-8151

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Waste Soil	001	[illegible]	[illegible]	Y	2[illegible]
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above: Ref. No. [illegible] Class [illegible] Non-Hazardous

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Gary [illegible] — Signature: [signature] — Month 4 Day 4 Year 91

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Danny [illegible] BFI — Signature: Danny [illegible] — Month Day Year [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Date

Printed/Typed Name — Signature — Month Day Year

White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

General Cable
CORPORATION

92195

November 3, 1995

TNRCC
P. O. Box 13087 MC 137
Austin, TX 78711-3087
Attn: Mr. Chet Clarke, RPR Section

SUBJECT: LPST-ID #092195 and LPST #097300

Dear Mr. Clarke:

Enclosed please find copies of material needed to close out the above noted UST's.

During a visit with Martha Britton, of Region 4, on October 30, 1995, the material was reviewed and found to be satisfactory. One piece of information required was found at Region 4, but when we called Austin they did not have this data which is part of this package.

With the submission of this information, I would like to request that you grant closure to the subject UST's.

Sincerely,

James F. Holloway
General Cable Corporation
formerly: Capital Wire & Cable

JFH:sm
enclosure

910 10TH ST. PLANO, TEXAS 75074
TELEPHONE (214) 423-6565 FAX (214) 423-6146

11-3-95

092195 12/28/92
CLARIFY1-6

TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

December 28, 1992

Re: Clarification -- Responsible Party Initiated Activities

Dear Responsible Party:

This letter is intended to clarify previous letters issued by the Texas Water Commission (TWC) dated October 23, 1992 regarding the termination of corrective action on priority 5 and 6 LPST cases, and November 9, 1992, which revised TWC policy for tank removal over-excavation.

The letters directed owners and operators to stop ongoing assessment activities and to return excavated materials to open excavations. These letters were issued in order to allow the TWC to evaluate all sites to better evaluate actual threat to health and the environment. The Commission will be implementing a risk based remediation program whereby sites will be cleaned up to a level where they no longer pose a risk to human health and the environment. The risk based approach will ensure the most efficient use of the limited funds available to perform corrective actions. In some cases risk assessment at sites will yield a decision that it is not necessary or prudent to clean sites to the traditional action levels of 30 ppm BTEX and 100 ppm TPH. It may be appropriate to leave higher levels of BTEX and TPH at some sites without creating undue risk.

The letters of October 23 and November 9 have apparently created a misunderstanding which I must correct. Those letters have been interpreted as absolute prohibitions on cleanups. This is not the case. Those letters were intended to warn tank owners of problems with the balance in the Petroleum Storage Tank Remediation Fund so that owners with potential cash flow difficulty would be advised not to spend money until they had reasonable assurance that money for reimbursement would be available. In order to further clarify this situation and to rectify misunderstandings that exist, you are advised as follows:

- Anyone who anticipates NOT seeking reimbursement from the PSTR Fund is free to proceed with cleanup activity.

- Anyone who is willing to proceed with cleanup, who expects reimbursement for eligible cleanup costs, but is also willing to wait an extended period of time for reimbursement, may proceed with cleanup activity in accordance with the procedure detailed in this letter.

12-28-92

- If free product, vapors, or other conditions present immediate threats to human health, the owner must proceed with emergency abatement actions immediately notwithstanding the fund balance. Claims of financial incapability will be reviewed by examining documentation of financial strength of the owner. TWC staff are to be consulted about whether an emergency exists and MUST BE NOTIFIED IMMEDIATELY about such a possibility.

Those who expect reimbursement but are willing to proceed with cleanup activity even though reimbursement is not likely to occur soon must understand very clearly that it is currently impossible to predict when reimbursement can be made.

In order to proceed, prior written approval from this agency is necessary. To obtain such approval, it is necessary to fill out the attached form completely. Approval will involve review of assessment plans and remedial action plans, or directives for the implementation of Limited Sites Assessments.

It is extremely important, if you wish to proceed with as little delay as possible, to indicate (on the attached form) whether you wish to proceed immediately with cleanup in spite of the likelihood that reimbursement from the PSTR Fund will be delayed for an undetermined, but potentially long period of time.

Along with you, we are anxious to see what action, if any, will be taken by the Legislature regarding the PST program. Please be assured that the agency will work to implement any changes in the least disruptive and most expeditious fashion possible. In the meantime, we thank you for your continued cooperation. If you need further information, please contact the Petroleum Storage Tank Division at 512/908-2200.

Sincerely,

James Francis Haley

Jim Haley
Deputy Director
Office of Waste Management and Pollution Cleanup

Enclosure

PETROLEUM STORAGE TANK DIVISION
LPST CASE REVIEW REQUEST FORM

This form is to be utilized when requesting a review of your Leaking Product Storage Tank case. Pursuant to 31, TAC, Chapter 334, Subchapter D and 334.310(f) Subchapter H, prior written approval must be received from the Texas Water Commission (TWC), Petroleum Storage Tank Division.

LPST ID No:_____ **[Submit one Form for Each LPST Site]**

Responsible Party (RP):_____

RP's Address:_____

RP's City, State, Zip:_____

Contact Person:_____

Facility Name:_____

Facility Address:_____

Facility City, County, Zip:_____

Contact Person:_____

Date(s) of Proposed Remedial Action plan's or assessment activities for which you are requesting review:

_____

Please Check One

____ I do not wish to start (continue) with my cleanup project until such time that reimbursements can be made in a reasonable timeframe (unless otherwise directed by the TWC).

____ I wish to start (continue) with my cleanup project at this time, further I acknowledge that any reimbursement for this site will be delayed for an undetermined, but potentially long period of time.

_____
Print Name

_____ _____
Responsible Party Signature Date

_____
Title

092195 11/10/92
STOP 3&4

TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

November 10, 1992

Re: Suspension of Corrective Action - Priorities 3 and 4 Only

Dear Responsible Party:

The Texas Water Commission (TWC) is establishing new procedures to more effectively control corrective action expenditures. The TWC will evaluate leaking storage tank sites according to the risk they pose to human health and safety. Those sites which are determined to present the highest risk to public health and safety will be addressed prior to those sites which pose a lesser risk.

Therefore, you are requested at this time to stop any on-going assessment activities (Corrective Action Phases 1, 2, or 3) at the site(s) referenced on the enclosed list and to submit copies of all collected laboratory analyses and corrective action information to the local TWC district field office and the TWC central office. Please address any current TWC request for additional information, but no additional assessment activities should be initiated without a TWC request to do so. If groundwater is impacted at your site and monitoring wells have been installed, then the quarterly sampling and monitoring program currently in effect should be modified as specified in the enclosed Groundwater Monitoring and Reporting guidance document. Projects which are under active remediation (Corrective Action Phase 4) as of the date of this letter should be continued. Remedial actions not initiated as of this date should not be initiated unless specifically directed by this letter (eg. emergency actions) or until directed by the TWC. Projects that are under a final quarterly monitoring program (Corrective Action Phase 5) should continue under the quarterly program so that those cases may be closed if appropriate to do so after four quarters of monitoring data have been provided. Please refer to the enclosed document for reporting requirements.

If an excavation remains open and needs to be filled, then use the excavated soil to do so unless the soil contains free product or the site is located over the Edwards aquifer recharge zone or transition zone. If the excavation has already been filled, if excavated soils contain free product, or if the site is located over the Edwards aquifer recharge or transition zones, then the excavated soils must ultimately be disposed at a landfill authorized to accept such waste or treated at a treatment facility registered or permitted by the TWC to treat such waste. If the TWC has granted concurrence for on-site treatment of the excavated soils, then that action may be continued. Please ensure that all soils are handled in accordance with Subchapter K of 31 TAC 334 and

11-10-92

coordinate disposal or treatment activities in advance with the coordinating TWC office. Additionally, any other necessary corrective action activities must be approved in advance by the coordinating TWC office. No action for which you will expect reimbursement from the Petroleum Storage Tank Remediation (PSTR) fund should be taken without prior approval from the agency.

Reimbursement for additional corrective action which has not been approved in advance by the TWC will not be reimbursed until TWC-directed or authorized corrective actions have been reimbursed. The only exception is the abatement of an emergency situation stemming from the release which threatens public health and safety. However, you are only authorized to take those actions necessary to abate the emergency and you must inform the local TWC district field office immediately upon discovery of any emergency situation. Any emergency response activities which continue beyond 48 hours must have written approval from the TWC. Free product removal does not require written approval to be extended beyond the 48 hours (31 TAC 334.310(f))

The question has arisen about how EPA will react to this action. Please be advised that TWC staff are coordinating information exchanges with EPA. Because EPA understands that this situation is temporary while we develop our risk assessment approach, we expect no problem from EPA.

The question has also been raised about third party liability which may occur if contamination is allowed to migrate off site. Unfortunately, we must distribute the limited PSTR funds that are available to ensure that human health is protected. This may not allow reimbursement for these situations where off-site contaminant migration may occur. At the same time, this directive to stop work will not necessarily shield you if a neighbor complains about contamination from your site. Therefore, if off-site contaminant migration seems likely, you should be prepared to pay for on-going remediation activities even though there may be a lengthy wait for reimbursement.

This directive is intended to prevent unnecessary expenditures from the PSTR fund. Should you decide to go forward with assessment and remediation activities, you should be aware of two things. First, if you have not received prior written approval from this agency, your request for reimbursement will be given the lowest priority. Second, because we are now instituting a risk assessment process, it may not be necessary to remove all contamination. Cleanups which go beyond what this agency would approve in writing pursuant to a risk assessment evaluation process will not be fully

reimbursed.

Finally, we request that you complete the enclosed Corrective Action Questionnaire based upon the data collected for the referenced site(s) at this time. One questionnaire should be filled out for **each** referenced site. The cost of completion of the questionnaire is a reimbursable activity for those sites eligible for reimbursement from the PSTR fund. Unless directed otherwise, you should not conduct additional assessment activities in order to complete the questionnairre. **We request that you utilize your environmental consultant to prepare this document.** The questionnaire(s) and any corrective action information not previously provided should be submitted to the both the TWC central office and the district field office within 45 days of the date of this letter. **Please ensure all information pertaining to the individual cases is identified with the appropriate LPST identification number and is addressed to the assigned TWC coordinator.**

We appreciate your cooperation in this matter. Should you have any questions, please contact your TWC case coordinator.

Sincerely,

Jim Haley
Deputy Director
Office of Waste Management and Pollution Cleanup

Enclosures

TEXAS WATER COMMISSION

km

March 31, 1989

Mr. Brent George
Ecco, Inc.
P. O. Box 843
Grapevine, TX 76051

Re: Disposal of Waste Generated at the Capital Wire and Cable, 910 East 10th St., Plano (Collin County), Texas
(LUST ID No. 92195)

Dear Mr. George:

This is in response to your letter dated March 20, 1989 requesting waste classification and code numbers for gasoline-contaminated soil generated at the above-referenced facility.

The Texas Solid Waste Code Number applicable to this waste is 280490 and it would be classified as equivalent to Class II industrial waste.

If we can be of further assistance, please contact Ms. Susie Frizlen of the TWC Underground Storage Tank Corrective Action Unit at 512/463-8569.

Sincerely,

for Keith Copeland, Head
Corrective Action Unit
Underground Storage Tank Section

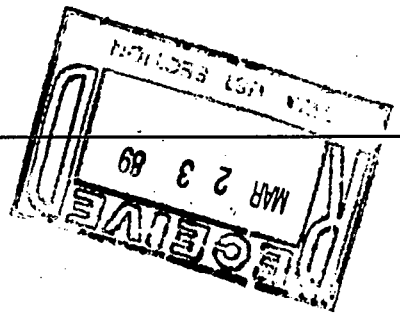
KC/bg

92195.wst

cc: Melissa Tanksley, TWC District 4 Field Office
(1019 N. Duncanville Road, Duncanville, Texas 75116-2201)

3-31-89

ECCO, INC.
P.O. Box 843
Grapevine, Texas 76051
(817) 481-1053



March 20, 1989 3-21-89

Texas Water Commission
P.O. Box 13087
Capitol Station
Austin, Texas 78771-3087

Attention: Corrective Action, Chet Clarke

RE: Soil Disposal

Dear Chet Clarke;

We are currently involved in the Capital Wire and Cable underground tank removal, soil disposal. The soil was analyzed and the BTEX was non-detected and the TPH was 10 mg/kg. (See attachment analysis). We are going to dispose of the 25 yards total at BFI landfill in Hutchins, Texas. Please assign me the appropriate class II waste code for this soil.

I appreciate your consideration in this matter.

Brent George
Sen. Proj. Mgr.

fac# 19699

3-20-89

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 11-4-88

REPORT NUMBER: 88-11451R
REPORT DATE: 11-8-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th St.
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

46360

SAMPLE DESCRIPTION: Soil
IDENTIFYING MARKS: Soil 4

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	10 mg/kg

*Method 418.1 by Infrared Spectroscopy

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454

Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

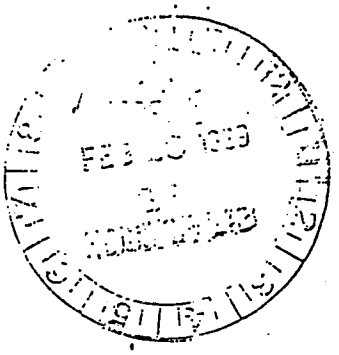
48360

Report No: 11451R

ENVIRONMENTAL LABORATORY REPORT

EPA METHOD 8020
AROMATIC VOLATILE ORGANICS

PARAMETER	DETECTION LIMIT (mg/kg)	**	AMOUNT DETECTION (mg/kg)
Benzene	0.002	.....	< 0.002
Chlorobenzene	0.002	.....	< 0.002
1,2-Dichlorobenzene	0.002	.....	< 0.002
1,3-Dichlorobenzene	0.002	.....	< 0.002
1,4-Dichlorobenzene	0.002	.....	< 0.002
Ethylbenzene	0.002	.....	< 0.002
Toluene	0.002	.....	0.044
Total Xylenes	0.002	.....	0.008



TELEPHONE MEMO TO THE FILE

(Please complete with typewriter or black pen)

Call To: S.F. Call From: Melissa Tankersley

Date of Call: 2-7-89 File No.:

Phone No.: (____) Subject: 92195

Information for File: Owner of Capitol Wire & Cable has aerated soil & wants to put soil back, or scatter on his property. At detection on BTEX & TPH. Melissa wants input on this, Facility in Plano.

TPH (10 ppm) BTEX (.002 ppm)

Toluene .044

Xylene .008

I called Melissa back on 2-8-89 to tell her no we can't allow them to do that.

2-7-89

Signed:

TWC-0225B (Rev. 09-01-85)

TEXAS WATER COMMISSION
ROUTE SLIP

From Sierra Evans Date 9/26/88 Suspense

To	Noted		To	Noted	
		TEXAS WATER COMMISSION			FIELD OPERATIONS DIVISION Brenda Price
		OFF.OF HEARINGS EXAMINERS			Emergency Response
		GENERAL COUNSEL			Program Services
		OFFICE OF CHIEF CLERK			Regions/Districts
		PUBLIC INTEREST ADVOCATE			
		EXECUTIVE DIRECTOR			HAZARDOUS & SOLID WASTE DIV.
		DEPUTY DIRECTOR			Superfund
		Public Information & Complaints			Enforcement
		Personnel			Program Support
					Permits
					Reports & Management
		LEGAL DIVISION			WATER RIGHTS & USES DIV.
		Water Quality			Interstate Compact Coor.
		Water Rights, Dists. & Financial			Water Use
		Water Rates			Dam Safety & Flood Management
		Hazardous Waste			Flood Management
		U.S.T. Program			Water Rights Administration
					Weslaco Watermaster
					Eagle Pass Watermaster
		WATER QUALITY DIVISION			Ground Water Conservation
		Water Quality Standards & Eval.			Drillers Board Assistance
		Wastewater Permits			Surface Casing
		Wastewater Enforcement			Weather & Climate
					Underground Storage Tanks (UST)
		ADMINISTRATIVE SERVICES DIV.			WATER UTILITIES DIVISION
		Staff Services			Districts
		Office Services			Creations & Bond Review
		Central Records			Reports & Management
		Library			Plans & Specs. Review
		Graphic Arts			Rates
		Data Processing Services			Certification Rate Design
		Fiscal Services			Financial Analysis
		Management Assistance Unit			
		Grants Management Unit			

Attachments For:
- [ ] Review/Coordination
- [ ] Necessary Action
- [ ] Prepare Response for _____ Signature
- [ ] Approval
- [ ] Information

File With:
- [ ] Your Files
- [ ] Directors' Files
- [ ] Central Files

Comments ATTN: Wade Stone.

TWC-0001 (Rev.10-07-87)

9-26-88

TEXAS WATER COMMISSION
ROUTE SLIP

From Slocum Date 9-13-88 Suspense

RECEIVED SEP 16 88

To	Noted		
		TEXAS WATER COMMISSION	
		OFF. OF HEARINGS EXAMINERS	
		GENERAL COUNSEL	
		OFFICE OF CHIEF CLERK	
		PUBLIC INTEREST ADVOCATE	
		EXECUTIVE DIRECTOR	
		DEPUTY DIRECTOR	
		PUBLIC INFORMATION & COMPLAINTS	
		LEGAL DIVISION	
		Water Qual. & Haz. Waste	
		Water Rights, Dists. & Financial	
		WATER DISTRICTS	
		Audits	
		Creations and Bond Review	
		Plans and Specs Review	
		WATER QUALITY DIVISION	
		Water Quality Planning	
		Wastewater Permits	
		Wastewater Enforcement	
		FIELD OPERATIONS	
		Spill Response	
		Laboratory Services	
		Stream Monitoring	
		Safety & Training	
		Regions/Districts	

To	Noted		
		ADMINISTRATIVE SERVICES	
		Fiscal Services	
		Personnel	
		Staff Services	
		Office Services	
		Purchasing, Supply & Inventory	
		Records & Library Services	
		Central Records	
		Library	
		Graphic Arts	
		Data Processing Services	
		HAZARDOUS & SOLID WASTE	
		Community Relations	
		Superfund	
		Hazardous & Solid Waste Enf.	
		Program Support	
		Underground Injection Control	
		Hazardous & Solid Waste Permits	
X		**WATER RIGHTS & USES** DAN McClellan	
		Interstate Compact Coor.	
		Water Use	
		Drillers Board Assistance	
		Dam Safety & Flood Management	
		Weather & Climate	
		Compliance & Watermaster Operations	
		Water Rights Administration	
		WATER RATES DIVISION	
		For Profit Rate Regulation	
		Public Appeals	

Attachments For:

- [ ] Review/Coordination
- [ ] Necessary Action
- [ ] Prepare Response for _____ Signature
- [ ] Approval
- [ ] Information

File With:

- [ ] Your Files
- [ ] Directors Files
- [ ] Central Files

Comments

WAIT FOR INCIDENT REPORT & ASSIGN TO W.S. WHEN RECEIVED.

TEXAS WATER COMMISSION

dm?

September 13, 1988

CERTIFIED MAIL #P 453 192 168
RETURN RECEIPT REQUESTED

Mr. Phil Pringle, Vice President
Capital Wire and Cable
P. O. Box 7
Plano, Texas 75074

RE: Subsurface Release of Unleaded Gasoline at Capital Wire and Cable, 900 Avenue F, Plano (Collin County), Texas (Facility No. 0019699)

Dear Mr. Pringle:

On July 8, 1988, our representative, Ms. Sierra Evans, conducted a tank removal inspection of the above-referenced facility. Collette Cyr, of Southern, and James Berry, of J-B-H Service and Equipment, Inc., and you were present at the inspection. During the inspection it was observed that a release of unleaded gasoline had occurred from one of the bungs on the underground storage tank. This release appears to be confined to the soils and sand backfill in the immediate vicinity of the tank hole.

The Texas Water Commission is responsible for protecting and maintaining the quality of state waters as well as the protection of public health and safety which may be threatened when the release of gasoline occurs from an underground storage tank system. Section 26.351(b) of the Texas Water Code requires the owner or operator of an underground storage tank system to immediately abate and remove any releases that may occur. The following steps must be followed to insure satisfactory remediation of your site:

1. Excavate the contaminated backfill and overexcavate the walls and floors of the tank pit.

2. Once the soil has been removed, representative samples should be collected, properly preserved, and analyzed for benzene, toluene, ethyl benzene, and xylene (BTEX) and total petroleum hydrocarbon (TPH).

9-13-88

The removed material may be disposed of at a municipal landfill (with the city's concurrence) if the concentration is below 500 ppm BTEX (50,000 ppm TPH). Prior to analyzing collected samples, you are advised to contact the proposed landfill regarding their disposal requirements. If the concentration levels are greater than 500 ppm BTEX (50,000 ppm TPH), the material must be transported accompanied by a completed manifest, to an industrial waste disposal site.

3. Representative samples should be collected from the floor and each wall of each overexcavated tank pit. The collected samples should be properly preserved and analyzed for the applicable constituent. The sampling must demonstrate that any remaining contamination decreases in concentration with an increase in distance from the original source of the release.

   The test results should be conveyed to Ms. Evans, of this office to verify cleanup of the tank pits.

4. If remediation activities determine that the extent of contamination is significantly greater than initially observed or that groundwater has been impacted, you are required to notify Ms. Evans, of this office, immediately.

The following documentation must be provided to the District 4 office within twenty-one days of receipt of this letter.

1. Copies of test results for samples collected from soil removed from the tank pit, and from the floor and walls of each overexcavated tank pit. Also, a site diagram indicating the locations of sample collection points should be provided.

2. A description of how the removed backfill and overexcavated material was handled on-site and ultimately disposed. Copies of receipts/manifests provided to you by the applicable disposal site should be submitted.

3. A description of material used to refill each tank pit.

Should you have any questions or require guidance in this matter, please contact Sierra Evans at 1019 North Duncanville Road, Duncanville, Texas 75116-2201; telephone (214) 298-6171.

Sincerely,

Charles D. Gill
District Manager

SE:hg

cc: Daniel J. McClellan
Head, Enforcement Section
Underground Storage Tank Program

TEXAS WATER COMMISSION
ROUTE SLIP

From Melissa Tanksley D-4 Date 2/7/89 Suspense

To	Noted		To	Noted	
		TEXAS WATER COMMISSION			FIELD OPERATIONS DIVISION
		OFF. OF HEARINGS EXAMINERS	✓		Susie Frizlen, UST Corrective Action Coordinator
		GENERAL COUNSEL			Emergency Response & Complaints
		OFFICE OF CHIEF CLERK			Program Services
					Regions/Districts
		PUBLIC INTEREST ADVOCATE			
					HAZARDOUS & SOLID WASTE DIV.
		EXECUTIVE DIRECTOR			Superfund
		DEPUTY DIRECTOR			Enforcement
		Public Information			Permits
		Personnel			Info. & Tech. Services
		LEGAL DIVISION			WATER RIGHTS & USES DIV.
					Interstate Compact Coor.
		WATER QUALITY DIVISION			Water Use
		Water Quality Standards & Eval.			Dam Safety & Flood Management
		Wastewater Permits			Flood Management
		Wastewater Enforcement			Water Rights Administration
					Weslaco Watermaster
		ADMINISTRATIVE SERVICES DIV.			Eagle Pass Watermaster
		Staff Services			Ground Water Conservation
		Purchasing			Drillers Board Assistance
		Property Management & Supply			Surface Casing
		Mail			Weather & Climate
		Central Records			Underground Storage Tanks (UST)
		Library			
		Graphic Arts			WATER UTILITIES DIVISION
		Data Processing Services			Districts
		Fiscal Services			Creations & Bond Review
		Management Assistance Unit			Reports & Management
		Grants Management Unit			Plans & Specs. Review
		Internal Audit Unit			Rates
					Certification & Rate Design
					Financial Analysis
					Compliance & Enforcement

Attachments For:
- ☐ Review/Coordination
- ☐ Necessary Action
- ☐ Prepare Response for _____ Signature
- ☐ Approval
- ☐ Information

File With:
- ☐ Your Files
- ☐ Directors' Files
- ☐ Central Files

Comments

LUST # 92195

1E

FEB 0 9 89

TELEPHONE MEMO TO THE FILE

(Please complete with typewriter or black pen)

Call To: Mr. Phil Pringle / Capital Wire & Cable Call From: Melissa Taksley / D-4

Date of Call: 2/7/89 File No.: LUST # 92195

Phone No.: (214) 423-6565 Subject: Soil aerated on-site

Information for File: Called Mr. Pringle to see if soil was still stockpiled and aerating. He said yes that they were waiting for our approval. I stated that it was my understanding he was going to have the soil backfilled into the tank hole. He said the tank hole was already filled in and since the levels were so low, could he spread it on his property. I said that was not generally acceptable and the fill may have to be transported to a landfill. In order to answer his question I told him I'd have to refer to Austin, central office for this case; especially since I was not the district coordinator on it.

RECEIVED
FEB 0 8 89

2-7-89

Signed: Melissa Taksley

TWC-0225B (Rev. 09-01-85)

MT

Capital
Wire & Cable Corporation

January 9, 1989

PHIL PRINGLE
Vice President - Engineering

Texas Water Commission - District 4
1019 N Duncanville Rd
Duncanville, Texas 75116-2201

Attn: Ms. Melisa Tanksley

Dear Ms. Tanksley:

Per our recent telephone conversation, I am herewith forwarding copies of soil analysis on excess soil removed from our underground tank installation. It is my understanding that we may scatter this soil on our own property as we are well within acceptable limits of BTEX and TPH.

Please confirm this so that we may conclude this matter expeditiously.

Yours truly,

Phil Pringle

PP/sw
Enclosures

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

DATE RECEIVED: 11-4-88

REPORT NUMBER: 88-11451R
REPORT DATE: 11-8-88

SAMPLE SUBMITTED BY: Capital Wire & Cable
ADDRESS: 910 East 10th St.
Plano, TX 75074
ATTENTION: Mr. Phil Pringle

SAMPLE DESCRIPTION: Soil
IDENTIFYING MARKS: Soil 4

ANALYSIS REPORT

TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon*	10 mg/kg	10 mg/kg

*Method 418.1 by Infrared Spectroscopy

NDRC Laboratories, Inc.

David R. Godwin, Ph.D.
Director of Technical Services

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

ENVIRONMENTAL LABORATORY REPORT

EPA METHOD 8020
AROMATIC VOLATILE ORGANICS

PARAMETER	DETECTION LIMIT (mg/kg)	**	AMOUNT DETECTION (mg/kg)
Benzene	0.002	.....	< 0.002
Chlorobenzene	0.002	.....	< 0.002
1,2-Dichlorobenzene	0.002	.....	< 0.002
1,3-Dichlorobenzene	0.002	.....	< 0.002
1,4-Dichlorobenzene	0.002	.....	< 0.002
Ethylbenzene	0.002	.....	< 0.002
Toluene	0.002	.....	0.044
Total Xylenes	0.002	.....	0.008

NDRC LABORATORIES, INC.

Dallas — 3553 Miller Park Drive, Garland, Texas 75042 • (214) 276-2986 • FAX (214) 494-2454
Houston — 6284 Brookhill Drive, Houston, Texas 77087 • (713) 644-9437

NDRC LABORATORIES, INC.
ENVIRONMENTAL LABORATORY REPORT

ORGANIC ANALYSIS FOR
EPA METHOD 8020

Organic compounds currently considered Priority Pollutants were analyzed at NDRC Laboratories, Inc. following the EPA Method 8020 for Gas Chromatography-Flame Ionization Detector.

Quality Control records of sample custody, handling and preparation are maintained as per EPA guidelines. Daily laboratory blanks as well as calibration checks are performed in compliance with EPA Quality Control and Method requirements.

NDRC Laboratories, Inc.

David R. Godwin, Ph:D.
Director of Technical Services

COORD. OFFICE (UST Enf., UST Contracts, or DFO)

TEXAS WATER COMMISSION

LEAKING UNDERGROUND STORAGE TANK

INCIDENT REPORT

LUST ID. NO.

SOL.WST.REG.NO. (if applicable)

STATUS INFORMATION

UST REG #: 0019699 LUST PRIORITY: IV

LUST DISCOV DATE: 7/8/88 TWC NOTIF DATE: 7/8/88

REPORTED BY: James Berry PHONE: (214) 638-7404

REPRESENTING: J-B-H Service & Equipment, Inc. 214-263-1619 (Fax)

REPORTED TO: Sierra Evans

On July 7, 1988, This was reported as a Tank removal by James Berry. No LUST was mentioned. July 8, 1988 This was discovered to be a priority IV LUST.

SUBSTANCES RELEASED

PETROLEUM PRODUCT(S) RELEASED: unleaded EST.VOL. UNK gal.s

HAZARDOUS SUBSTANCE RELEASED: N/A EST.VOL. N/A gal.s

RELEASE DETECTION METHOD: Visual Observation
(Routine Monitor, Tank Test, Visual Observation; Other)

COMMENTS: Unleaded gasoline leaked at fill tube / bung connection when gas went above. That connection.

LOCATION OF RELEASE

NAME OF FACILITY: Capital Wire and Cable.

FACILITY ADDRESS: 980 Ave. F. PHONE: (214) 423-6565

FACILITY CITY: Plano COUNTY: Collin (043) (Code #) ZIP: 75074

OTHER LOCATION INFO: none.

RESPONSIBLE PARTY

TANK OWNER/COMPANY: Capital Wire & Cable.

MAILING ADDRESS: 910 10th St, P.O. Box 7

CITY: Plano STATE: TX

PHONE: (214) 423-6565 ZIP CODE: 75074

CONTACT (NAME/TITLE): Phil Pringle / Vice president

Revised 6/88

AFFECTED WATERS

GROUNDWATER AFFECTED?: No (Yes, No, Unknown) SURFACE WATER AFFECTED?: No (Yes, No, Unknown)

GROUNDWATER STATUS: Usable (Usable, Unusable, Unknown) SURFACE WATER STATUS: No known surface water in close proximity to this site.

COMMENTS: None.

RELEASE DATA

RELEASE ORIGIN: Fill Tube / bung connection - overfills. (Tank, Lines, Overfill, Intentional Release; Specify if other)

RELEASE CAUSE: Possibly corrosion and/or improper installation. (Corrosion, Equip. Failure, Human Error, Improper Installation, Other)

AFFECTED MEDIA: Soil (Soil, Subsurface Utilities, Habitations, Other)

RELEASE DESCRIPTION: When gasoline filled the inside of the fill tube unleaded gas leaked at the fill tube / bung connection.

ANTICIPATED HAZARDS

HAZARDS/THREATS DESCRIPTION: None.

TWC DIRECTIVES/TO WHOM: Minorized CAD letter sent to Phil Pringle of Capital Wire and Cable. Contamination was minimal. Cleanup finalized through District 4 directives.

INITIAL AND CURRENT RESPONSE/BY WHOM: Monitor wells installed, consultant hired for contamination assessment / remediation, Tanks to be removed - Set up by Phil Pringle prior to TWC notified.

MANAGEMENT DATA

INSPECTION BY TWC: Yes/ (Yes or No/Date) INSPECTOR NAME/OFFICE: Sierra Evans / Dist. 4.

UST COORDINATOR: Sierra Evans DIST. COORDINATOR: Sierra Evans

OTHER AUTHORITIES INVOLVED: Southern Waste Management

ERU NOTIFICATION: ____ (Check when complete) REFERRAL DATE: ____

SIGNED BY: C. Sierra Evans DATE SIGNED: 9/21/88

APPROVED BY (Optional): ____ DATE APPROVED: ____

Revised 6/88

TEXAS WATER COMMISSION

September 13, 1988

CERTIFIED MAIL #P 453 192 168
RETURN RECEIPT REQUESTED

Mr. Phil Pringle, Vice President
Capital Wire and Cable
P. O. Box 7
Plano, Texas 75074

RE: Subsurface Release of Unleaded Gasoline at Capital Wire and Cable, 900 Avenue F, Plano (Collin County), Texas (Facility No. 0019699)

Dear Mr. Pringle:

On July 8, 1988, our representative, Ms. Sierra Evans, conducted a tank removal inspection of the above-referenced facility. Collette Cyr, of Southern, and James Berry, of J-B-H Service and Equipment, Inc., and you were present at the inspection. During the inspection it was observed that a release of unleaded gasoline had occurred from one of the bungs on the underground storage tank. This release appears to be confined to the soils and sand backfill in the immediate vicinity of the tank hole.

The Texas Water Commission is responsible for protecting and maintaining the quality of state waters as well as the protection of public health and safety which may be threatened when the release of gasoline occurs from an underground storage tank system. Section 26.351(b) of the Texas Water Code requires the owner or operator of an underground storage tank system to immediately abate and remove any releases that may occur. The following steps must be followed to insure satisfactory remediation of your site:

1. Excavate the contaminated backfill and overexcavate the walls and floors of the tank pit.

2. Once the soil has been removed, representative samples should be collected, properly preserved, and analyzed for benzene, toluene, ethyl benzene, and xylene (BTEX) and total petroleum hydrocarbon (TPH).

The removed material may be disposed of at a municipal landfill (with the city's concurrence) if the concentration is below 500 ppm BTEX (50,000 ppm TPH). Prior to analyzing collected samples, you are advised to contact the proposed landfill regarding their disposal requirements. If the concentration levels are greater than 500 ppm BTEX (50,000 ppm TPH), the material must be transported accompanied by a completed manifest, to an industrial waste disposal site.

3. Representative samples should be collected from the floor and each wall of each overexcavated tank pit. The collected samples should be properly preserved and analyzed for the applicable constituent. The sampling must demonstrate that any remaining contamination decreases in concentration with an increase in distance from the original source of the release.

   The test results should be conveyed to Ms. Evans, of this office to verify cleanup of the tank pits.

4. If remediation activities determine that the extent of contamination is significantly greater than initially observed or that groundwater has been impacted, you are required to notify Ms. Evans, of this office, immediately.

The following documentation must be provided to the District 4 office within twenty-one days of receipt of this letter.

1. Copies of test results for samples collected from soil removed from the tank pit, and from the floor and walls of each overexcavated tank pit. Also, a site diagram indicating the locations of sample collection points should be provided.

2. A description of how the removed backfill and overexcavated material was handled on-site and ultimately disposed. Copies of receipts/manifests provided to you by the applicable disposal site should be submitted.

3. A description of material used to refill each tank pit.

Should you have any questions or require guidance in this matter, please contact Sierra Evans at 1019 North Duncanville Road, Duncanville, Texas 75116-2201; telephone (214) 298-6171.

Sincerely,

Charles D. Gill
District Manager

SE:hg

cc: Daniel J. McClellan
Head, Enforcement Section
Underground Storage Tank Program

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : UST Technical Support Unit
Attention: Allen Martinez

DATE: 8/2/88

THRU : Brenda Price, UST Coordinator,
Field Operations Division

FROM : Sierra Evans, Environmental Quality Specialist
District 4 - Dunamville

SUBJECT: Inspection of UST Construction Activity

FACILITY Capital Wire & Cable

ADDRESS 910 10th St.

CITY, COUNTY Plano, Collin

UST ID NUMBER 0019699

TYPE ACTIVITY

Installation ✓
Removal ____
Replacement ____
Abandonment ____
Other (specify) ____

DATE OF INSPECTION 8/2/88

SUMMARY OF INSPECTION None.

COMMENTS This priority II case was handled by TWC, District 4. Contamination was cleaned up prior to this new installation.

PERSONNEL PRESENT ON SITE DURING INSPECTION Phil Pringle/Capital Wire & Cable; James Berry/JB-H Service & Equip., Inc; & Sierra Elam TWC

WAS CONSTRUCTION ACTIVITY COMPLIANT WITH 31 TAC 334 ? yes

WAS CONSTRUCTION ACTIVITY COMPLIANT WITH LOCAL REGULATIONS ? yes

WAS A LUST DISCOVERED ? no.

ATTACHMENTS: Construction Checklist.

Signed Sierra Evans Approved ____

CHNICAL STANDARDS
IOLATIONS
____YES _✓_NO

LUST _✓_YES ____NO

Texas Water Commission
UST Construction Checklist

DATE INSPECTION 8/2/88
DATE REPORT 8/2/88
INSPECTOR Sierra Evans

GENERAL FACILITY & SITE INFORMATION

1. **Type of Activity:** Cable & Wire Manufacturer

2. **Facility Name:** Cable W
   Location: 900 Ave. F
   City: Plano **Co:** Collin
   Telephone: 214-423-6565
   UST Fac. No. (if known): 0019699

3. **Owner:** Coastal Wire & Cable
   Representative: Phil Pringle
   Title: Vice President - Engineering
   Address: 900 Ave. F 75076 -
   City/St/Zip: Plano, Texas 75074 -
   Telephone: 214-423-6565

4. **Consultant:** Southern Solvents & Waste Manage
   Representative: Colletta Cyr
   Title: General Manager
   Address: P.O. Box 59847
   City/St/Zip: Dallas, TX. 75229
   Telephone: 214-869-0417
   800-442-3065 (TX. wats)

5. **UST Contractor:** J-B-H Service & Equip., I
   Representative: James Berry
   Title: President
   Address: 2525 Barge Lane
   City/St/Zip: Dallas, TX. 75212
   Telephone: 214-638-7404
   214-263-1619 (metro)

6. **Facility/Site Description:**
   Type Facility: Cable & Wire Manufacturer **Facility Status:** Operating
   Locale: 900 Ave F, Plano, TX **Prevailing Land Use:** Farm land
   Nearby Surface Features (roads, rivers, etc.) 900 Ave F
   Adjacent/Nearby Buildings or Structures: railroad & residential area
   Geological/Hydrogeological Features: Sandy Clay

7. **Planning Materials:**
   Construction Plans: None available
   Project Specifications: installed according to Fire Code (1979)
   Equipment Operating Instructions: None
   As-Built Plans On-Site: N/A
   Closure Plan: will send to TWC
   Other (specify): none
   Copies Filed with TWC: Construction Notification

8. **Remarks:** Final report from consultant will be filed with TWC.

ABANDONMENT AND REMOVAL INFORMATION

1. **Type of Activity:** _____ Abandonment-in-Place; ✓ Removal
2. **No. of Tanks Involved:** 1. **Written closure plan:** will be mailed to TWC.
3. **Reason(s) for Removing from Service:** 8,000 gal. tank not tight. Spillage from pipe (≈100 gallons lost).

4. **Tank Information:**

	Tank 1	Tank 2	Tank ____	Tank ____
Last Product Stored	regular	unleaded		
Last Date Used (est.)	9 yrs	9 yrs.		
Age (if known)	9 yrs.	9 yrs.		
Capacity (gallons)	5 000	8 000		
Material	steel	steel		
Manufacturer	Starcor	Starcor.		
Sgl. or Dbl. Wall	sgl.	sgl.		
Exterior Coating	none	none		
Interior Lining	none	none		
Cath. Protection	yes	yes.		
Condition/Appearance	okay	okay		

Remarks: Regular gasoline tank - hole punched in tank during removal. This morning. Unleaded gasoline tank - rusting at seams, but not all the way through, and bunk broken.

5. **Procedures for Abandonment-in-Place.**

Product Removal/Disposal: _____

Extent of Excavation: _____

Preparation of Piping, Fill Tubes, Tanks, etc. _____

Method(s) of Purging Vapors: _____

Procedures & Materials for Tank Filling: _____

Remarks: _____

6. **Procedures for UST removal.**

Product Removal/Disposal: Skimmed off water in pit (not groundwater), & placed in 55-gal. drum (sample and disposed of properly). Uncontaminated water pumped down sewer.

Extent of Excavation: 25 ft x 25 ft x 10 ft.

Preparation of Piping, Fill Tubes, etc.: None

Tank Removal/Temp. On-Site Storage: Ambient.

Method(s) of Purging Vapors: no purging

Tank Disposal/Destination: Liberty Iron on Westmoreland St. in Dallas, TX.

Remarks: Backfill allowed to aerate. Sample & chemical analysis will be taken. Clean soil (< 30 ppm BTEX) placed back in soil. Contaminated soil will be removed to Municipal Landfill

7. **Inspection/Assessment of Tank Pit and Site.**

Leaks/Spills: About 100 gallons lost from overfill. Leak possibley at pipe connection at bungs.

Removal of free product/contaminated groundwater or soil: Skimmed off water in pit (not groundwater)
See Additional Information

Soil/Water Sampling Procedures: Samples collect from floor and walls using new pairs of gloves, metal scoop (washed with D.I. water between samples) approx. 1 ft into backfill. Labeled and placed in ice. Water sample taken not observed.

LUST Reported to UST Enforcement Unit (Name & Date): No report of a LUST. Discovered this was a LUST case on the day of inspection.

Remarks:

8. **Additional Information:** FREE Product ~~Raw Water/Surface water in tank pit:~~ product skimmed off water and pumped into a new 55 gallon drum. Based on chemical analysis of ~~water~~ sample, drum was disposed of properly.

Free Product in Soil: Soil placed on asphalt and allowed to aerate. Chemical analysis run on backfill. Soil w/less than 30 ppm BTEX placed back in hole. Contaminated soil to be removed to a Municipal Landfill.

14

SF

COORD. OFFICE (UST Enf., UST Contracts, or DFO)

TEXAS WATER COMMISSION

LEAKING UNDERGROUND STORAGE TANK

INCIDENT REPORT

92195
LUST ID. NO.

SOL.WST.REG.NO. (if applicable)

WN-35 BY

STATUS INFORMATION

UST REG #: 0019699 LUST PRIORITY: III

LUST DISCOV DATE: 7/8/88 TWC NOTIF DATE: 7/8/88

REPORTED BY: James Berry PHONE: (214) 638-7404

REPRESENTING: J-B-H Service & Equipment, Inc. 214-263-1619 (metro)

REPORTED TO: Siena Evans

On July 7, 1988, This was reported as a Tank removal by James Berry. No LUST was mentioned. July 8, 1988 This was discovered to be a priority IV LUST.

SUBSTANCES RELEASED

PETROLEUM PRODUCT(S) RELEASED: unleaded EST.VOL. UNK gal.s

HAZARDOUS SUBSTANCE RELEASED: N/A EST.VOL. N/A gal.s

RELEASE DETECTION METHOD: Visual Observation
(Routine Monitor, Tank Test, Visual Observation; Other)

COMMENTS: Unleaded gasoline leaked at fill tube / bung connection when gas went above. That connection.

LOCATION OF RELEASE

NAME OF FACILITY: Capital Wire and Cable.

FACILITY ADDRESS: 900 Ave. F. PHONE: (214) 423-6565

FACILITY CITY: Plano COUNTY: Collin (043) (Code #) ZIP: 75074

OTHER LOCATION INFO: None.

RECEIVED
OCT 4 1988
FIELD OPERATIONS

RESPONSIBLE PARTY

TANK OWNER/COMPANY: Capital Wire & Cable.

MAILING ADDRESS: 910 10th St, P.O. Box 7

CITY: Plano STATE: TX

PHONE: (214) 423-6565 ZIP CODE: 75074

CONTACT (NAME/TITLE): Phil Pringle / Vice-president

RECEIVED
OCT 05 88

Revised 6/88

7-8-88

AFFECTED WATERS

GROUNDWATER AFFECTED?: No (Yes, No, Unknown) SURFACE WATER AFFECTED?: No (Yes, No, Unknown)

GROUNDWATER STATUS: Usable (Usable, Unusable, Unknown) SURFACE WATER STATUS: No known surface water in close proximity to this site.

COMMENTS: None.

RELEASE DATA

RELEASE ORIGIN: Fill tube / bung connection - overfills. (Tank, Lines, Overfill, Intentional Release; Specify if other)

RELEASE CAUSE: Possibly corrosion and/or improper installation. (Corrosion, Equip. Failure, Human Error, Improper Installation, Other)

AFFECTED MEDIA: Soil (Soil, Subsurface Utilities, Habitations, Other)

RELEASE DESCRIPTION: When gasoline filled the inside of the fill tube, unleaded gas leaked at the fill tube / bung connection.

ANTICIPATED HAZARDS

HAZARDS/THREATS DESCRIPTION: None.

TWC DIRECTIVES/TO WHOM: Minorized CAD letter sent to Phil Pringle of Capital Wire and Cable. Contamination was minimal. Cleanup finalized through District 4 directives.

INITIAL AND CURRENT RESPONSE/BY WHOM: Monitor wells installed, consultant hired for contamination assessment / remediation. Tanks arranged to be removed - set up by Phil Pringle prior to TWC notified.

MANAGEMENT DATA

INSPECTION BY TWC: Yes/ (Yes or No/Date) INSPECTOR NAME/OFFICE: Sierra Evans / Dist. 4.

UST COORDINATOR: Sierra Evans DIST. COORDINATOR: Sierra Evans

OTHER AUTHORITIES INVOLVED: Southern Waste Management

ERU NOTIFICATION: ____ (Check when complete) REFERRAL DATE: ____

SIGNED BY: C. Sierra Evans DATE SIGNED: 9/21/88

APPROVED BY (Optional): [signature] DATE APPROVED: ____

Revised 6/88

MINIMAL SPILL
NO INCIDENT REPORT

DISTRICT 4

AUG 0 1 (

UST/LUST SITE INVESTIGATION TRACKING REPORT

ACTIVITY UST INV.

✓ LUST
____ UST ROUTINE CONSTRUCTION
____ UST TECHNICAL STANDARDS VIOLATIONS

FACILITY ID NUMBER 0019699

FACILITY NAME Capital Wire and Cable

FACILITY LOCATION Plano (city) 900 Ave F (address)
Plano, TX. 75076
(Collin Co.)

TYPE INSPECTION

____ INITIAL ✓ FOLLOW-UP ?

OBSERVATIONS The writer met with Jimmy & Kevin of NDRC Laboratories and Phil Pringle of Capital Wire and Cable. NDRC personnel collected two soil samples from each wall of the tank pit. 2-3 ft deep Due to the floor of the pit covered with water (due to surface runoff as a result of the rain), a representative floor sample could not be collected. The writer gave directives to skim off the petroleum / water mixture, place it in a clean drum and properly dispose of it. A water sample was collected and will be analyzed. Based on the analysis and city regulations for sewer disposal will determine the disposal of the existing water in the pit. After the water is removed, the floor needs to sampled for BTEX. A composite of the backfill also needs to be collected and sampled for BTEX. The samples collected were chilled on ice immediately.

DATE INSPECTION 88 7 12 (YYMMDD)

DATE REPORT 88 7 12 (YYMMDD)

INSPECTOR Sierra Evans

BP

9-12-88

TELEPHONE MEMO TO THE FILE

(Please complete with typewriter or black pen)

Call To: S. EVANS D-4

Call From: W. STONE

Date of Call: 9-12-88

File No.: ——

Phone No.: (____)

Subject: CAPITAL WIRE & CABLE

Information for File: I CALLED SIERRA TO ASK IF THE UST SYSTEM AT THE SUBJECT SITE HAD A RELEASE. SHE SAID THAT A TANK VALVE HAD FAILED DURING FILLING OPERATIONS CAUSING A SMALL RELEASE. SHE SAID THAT THE TANKHOLD HAD BEEN OVEREXCAVATED & NATIVE SOIL SAMPLED. SHE CONSIDERS THE INCIDENT FINALED. NO INCIDENT REPORT WAS SUBMITTED.

Signed: Wade Stone

TWC-0225B (Rev. 09-01-85)