

**From:** Joseph Bell  
**Sent:** Wednesday, September 19, 2018 2:17 PM  
**To:** Michael Marcon  
**Subject:** RE: Milner Road Meeting

Mike,

Thanks for meeting with us. Please see my responses below.

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**From:** Michael Marcon [REDACTED]  
**Sent:** Tuesday, September 18, 2018 1:36 PM  
**To:** Joseph Bell <Joseph.Bell@tceq.texas.gov>  
**Subject:** Milner Road Meeting

Joe:

Again, I would like to take the time to thank you for meeting with us last week. I think it was good to talk through the pending issues. As we discussed during the meeting, I am preparing a summary of the discussion points.

1. City of Houston MSD Ordinance was issued and will provide some relief when it comes to groundwater monitoring. This will be determined based on the planned sampling activities for the drinking water wells and the additional sampling requested.

Agreed

2. The primary concern is the drinking water wells located along Satsuma and Signet Streets. InControl believes they are sampling all the wells in the footprint of the plume. The TCEQ is concerned that the second transmissive unit, which flows northwest from site, could potentially impact drinking water wells to north.

Agreed, but our concern is more that we cannot adequately defend a position that they are not, as opposed to a position that they constitute an immediate threat to users.

3. Concerned about construction details for potentially exposed wells. Request that InControl provide more details regarding wells west of Satsuma.

Agreed; however, as above, this relates more to the comfort level of not sampling additional water wells. Principally, we desire to know that we are not missing any shallow water wells.

4. TCEQ wants a groundwater sample from the second transmissive unit downgradient of plume. Suggested locations were near MW-9 and/or MW-33. If the data indicated a "clean" line between the chemicals found in the second unit and the offsite water wells, TCEQ will consider allowing deep zone wells to be plugged. Secondly, InControl Technologies is requesting permission to plug and abandon the wells on the Quest Chemical Site. (MW-1R, MW-3R and MW13).

Agreed, but concurrence is not yet given. Concurrence is dependent upon submittal of a reasoned justification for the plugging and abandonment. We discussed this in the meeting, but a formal submittal is warranted.

4. Given the status of the MSD and assuming the deep zone well is clean, InControl would like to petition for plugging all groundwater monitoring wells north and east of MW-29.

Agreed, but concurrence is contingent upon the MSD certificate being issued by TCEQ. Monitoring wells north and east of MW-29 provide no useful data to the fundamental question remaining regarding the water wells. Note, however, that TCEQ has not completely ruled out vapor intrusion for the site and surrounding area, so you may want to factor that into your decision-making.

5. The TCEQ is concerned that a slug of solvent is migrating down the plume. The TCEQ wants the wells west of MW-29 to monitor this hypothetical slug.

Agreed.

6. InControl requested a Partial Response Action Area Closure for the former Quest Chemical site. The TCEQ suggested that might be difficult; however, a phased certificate may be possible.

I would say that it would be unlikely and I do not know how it could be done, since the source is linked to the off-site contamination that must be addressed. Phasing is an option in some situations, but it currently “requires” cutting off all contribution to off-site and that cannot be said to be occurring. Therefore, I think we also ended up saying that phasing was unlikely. The most likely scenario we came up with regarding a certificate for the Quest Chemical property was an MSD-based conditional certificate of completion, with select monitoring and water well sampling incorporated into the certificate’s conditions.

7. TCEQ indicated that Milner should provide multiple lines of evidence regarding the protection of the neighboring private water supply wells to help determine the final sampling efforts to close out this site.

Agreed, but I don’t think we indicated any time frame for final closure (extrapolating from your bullet) . Instead we indicated that the conditional route might be available sooner.

I think these are the items we discussed. If you can think of something else, please edit and send back.

This sounds correct. Thanks!

Peace  
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