

Kent Cooper

From: Rick Robertson <rick@terra-solve.com>
Sent: Tuesday, November 14, 2023 8:48 AM
To: kcooper@co.titus.tx.us; kboyd@mpcity.org
Cc: craig411@sbcglobal.net; bmccraig@sbcglobal.net
Subject: RE: Off-Site Access options for the Billy Craig Service Center Monitoring Wells for TCEQ

Judge Cooper / Mr. Boyd:

I just wanted to follow up on this email from last week.

Mr. Craig is anxious to begin this work. Can I answer any questions you have? We would like to move forward with this work.

Thank you.

RICK ROBERTSON



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From: Rick Robertson <rick@terra-solve.com>
Sent: Tuesday, November 7, 2023 7:25 PM
To: 'kcooper@co.titus.tx.us' <kcooper@co.titus.tx.us>; 'kboyd@mpcity.org' <kboyd@mpcity.org>
Cc: 'craig411@sbcglobal.net' <craig411@sbcglobal.net>; 'bmccraig@sbcglobal.net' <bmccraig@sbcglobal.net>
Subject: Off-Site Access options for the Billy Craig Service Center Monitoring Wells for TCEQ

Hon. Judge Cooper and Mr. Boyd:

As I discussed with Your Honor and as I mentioned in my voicemails to you, Mr. Boyd, I have been engaged by Mr. Chet Craig to help him comply with the requirements of the TCEQ to investigate his property for possible soil and groundwater impacts from the operation of various past UST systems on the property.

As the first step, the TCEQ requires the installation of permanent monitoring wells on and around the suspected areas of contamination as was identified in our initial temporary monitoring wells. The intent of these wells are to define the upgradient, downgradient, and cross-gradient extent of this contamination.

Due to the location of the former and current UST systems near the southwestern corner of the site, and the ground slope and likely direction of groundwater flow in that same direction, it is necessary for us to seek permission from one or both of your entities for access to have any chance of this delineation being successful. I have attached an aerial with proposed locations that we would like you to consider.

The wells themselves are 2-inch PVC pipe with slots in the lower portion to allow groundwater to flow into the pipe. The holes are about 8 inches in diameter and the annular space around the pipe is filled with filter sand topped by a water-sealing bentonite clay. The surface is repaired with concrete around a bolted cover that is flush with the ground so that vehicles can drive over them. They look like this when completed ↓ And here is a picture of the small drilling rig that installs them; it is about the size of a pickup and takes only an hour or so to drill and install each well ↓:





The wells remain in place until the TCEQ agrees that they can be removed at which time they are pulled and the holes plugged and the surface refinished. This can take several years during which time we take samples every quarter of the year to monitor groundwater levels and concentrations.

We of course share the data from the site with you during this period. In most cases, the TCEQ allows them to be pulled once it is demonstrated that the area of contamination is defined, non-growing, and has contaminant levels that do not have an impact on human health. It very rarely requires that such contamination be remediated or removed; normally within cities in Texas the lack of nearby water supply wells, basements, or fractured rock which could accelerate its spread means that a low-level of contamination can be left in place with no additional requirements other than perhaps a prohibition on installing wells in the area or digging a basement, say. These restrictions normally don't encumber the future use of the site.

In reviewing the attached map, you will see that we seek to install what I have called monitoring well MW-E and MW-F on the County Property and MW-D on the city right-of-way. I might also want the flexibility to install MW-B and MW-C in the ROW although I think I have room based on the Titus CAD aerial; if the City has a more detailed and exact map I would like to get a copy. Of course, if I get permission to put the wells there, it is a moot point whether I am on either side of the line.

If the County is not amenable to granting access for MW-E and MW-F, I could put MW-F in the city ROW, but MW-E would probably not be moveable due to overhead utility lines along the south side of W. 1st Street. So we certainly would like to have access to this property as well as the ROW.

Please review this information and let me know if you are amenable to giving us access. If there are associated permits, paperwork, fees, etc., please let me know. If you do not have a formal process for this, I have agreements that I have

developed over the past 30 years which I use with governments and private property owners that outline our responsibilities and show how we take on the liabilities for the work under our insurance.

Thank you for your time.

RICK ROBERTSON



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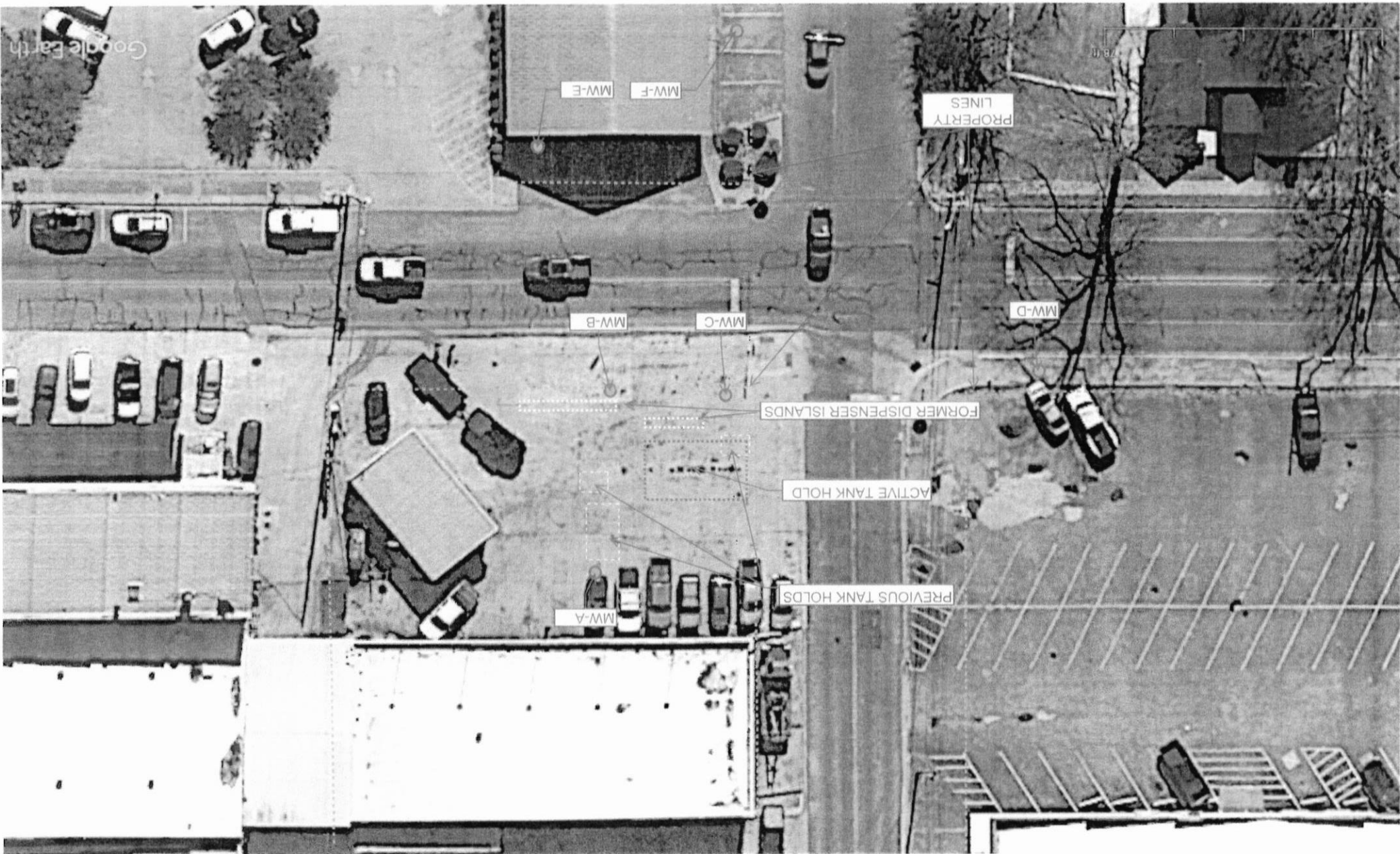
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Google Earth

MW-E

MW-F

PROPERTY LINES

MW-B

MW-C

MW-D

FORMER DISPENSER ISLANDS

ACTIVE TANK HOLD

MW-A

PREVIOUS TANK HOLDS