



# City of Belton

~ Public Works ~

January 27, 2016

Texas Commission on Environmental Quality  
Remediation Division  
Superfund Section  
Attention: Project Manager  
Rockwool Industries Inc. Federal Superfund Site  
MC-136  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Rockwool Industries Federal Superfund Site - 2015 Annual Report

To whom it may concern:

This letter serves as the 2015 annual report on operation and maintenance activities performed by the City of Belton at the Rockwool Industries Federal Superfund Site as required by the letter from the TCEQ's Director of the Remediation Division dated December 21, 2011 as well as required by the Texas Risk Reduction Program Restrictive Covenants for Tracts 8, 9, and 10 through 13. The City of Belton has incorporated recorded City Ordinances on institutional controls, as well as operation and maintenance activities, to support the remedial efforts of the EPA and TCEQ for the Rockwool Industries Federal Superfund Site. These actions uphold the City's commitments to TCEQ in relation to both the terms of the lien release and the protection of the clay cap and vegetative cover over the contaminated areas.

The City has performed maintenance tasks on the property to protect the site and to meet the requirements of the institutional control measures and standards as stated in the City Ordinance No. 2013-02, which were derived from the Rockwool Superfund Site Record of Decision (ROD) and Explanation of Significant Differences (ESD). Included in this report are photographs taken in January 2016 to document the current status of the site, along with the results of these maintenance activities. The photos included in the report are meant to be representative of all Tracts 8 through 13. Maintenance tasks include:

1. Replace and maintain fencing, gates, and signage;
2. Maintain site vegetation, clay caps, and trees by inspecting and correcting areas showing signs of burrowing animals, settlement, erosion, water damage, and areas with no vegetation;
3. Mow the property at a minimum three times a year including removing vegetation around monitoring wells;
4. Inspect the drainage controls and remove any debris that accumulates or any objects that restrict flow, with the exception of the MatCon perimeter drainage, clean and maintain the detention pond and drainage areas;
5. Clean and maintain the culverts;
6. Review and if required, report any vegetation growth upon any of the articulating concrete blocks to TCEQ and maintain soil infill and vegetation adjacent to the blocks, along the river bank; and
7. Document onsite and offsite land uses.



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The following sections in this annual report follows Exhibit C of the Restrictive Covenants for each Tracts 8, 9, and 10 through 13.

## **Item No. 1 – Fencing, Gates, and Signage**

In addition to the installation of new fencing performed by Daniel B. Stephens & Associates, Inc. completed on August 8, 2014, at minimum, the City semiannually inspects and repairs any damaged or failing fencing around the entire perimeter of the property. The City also inspects and repairs any damaged gates or signage. The newly installed fencing is still in good condition. No fencing, gate, or signage issues were noted in 2015.

Date(s) Inspected/Maintained: February 3 and 11, 2015; July 22, 2015

### **Property Fencing**



Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.050565, -97.438415 looking south towards FM93



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**Property Fencing Installed in 2014**



Photo Taken January 21, 2016

Location: Tract No. 8

Near 31.053905, -97.440838 looking east

## **Item No. 2 and 3 – Site Vegetation and Surface Preservation, Site Mowing**

Vegetation is kept at an acceptable height, and any large pieces of brush are removed from the site. The City and the Belton Economic Development Corporation (BEDC) partnered with a local contractor to remove excess brush and surface debris from the site. Vegetation surrounding monitoring wells is mowed or removed using weed-eaters. The site is inspected at least twice a year for areas without vegetation, holes from burrowing animals, indications of settlement, wet areas or water damage, erosion damage, and cracking in the soil. Areas of soil or vegetative damage are corrected with clean soil material and are reseeded as necessary. The site remained in good condition with no major areas repaired in 2015.

The City actively maintains the property by mowing at least three times a year and maintaining the trees on site. Mowing includes the outer edge of the berm surrounding the MatCon capped containment cell up to the top of the berm, excluding the inner side of the berm or the MatCon perimeter drainage. During the mowing maintenance activities, the non-maintenance areas such as the MatCon cap are inspected and any potential issues or concerns are then reported to TCEQ. No issues or concerns were noted in 2015.

Date(s) Maintained: April 6-8, 2015; June 25-30, 2015, July 22-31, 2015, December 15, 2015



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## Maintenance of Site Vegetation and Trees



Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.050460, -97.438617 looking south

## Site Vegetation around Monitoring Wells



Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.049893, -97.442375 looking north



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## Item No. 4 and 5 – Drainage Controls and Culverts

The property contains detention ponds and various drainage features. The detention pond maintains a shallow level of vegetation for erosion control purposes. Any larger bushes and trees are removed from the pond. The outfall of the pond is also cleared of obstructions and the concrete is repaired, if required. Any berms, except for the MatCon berm, are repaired if erosion or damage is observed. Blockage and any damage to the area culverts are addressed as needed. Any objects including vegetation and sediment restricting flow are removed. Like the detention pond, the vegetation is allowed to be present at the outfall for erosion and energy dissipation purposes. At minimum, all drainage controls are inspected and maintained semiannually. The drainage features on the property are in good condition, and no major damage was reported in 2015. On April 10, 2015, the City performed minor re-grading of the drainage channel in order to redefine the channel due to minor erosion and silt deposit.

Just prior to the City's work on the site, TCEQ's consultant, Daniel B. Stephens & Associates, Inc., also noted they would be inspecting the site on March 16, 2015. Daniel B. Stephens & Associates stated their inspection would include evaluating the integrity of the concrete stormwater outfall for signs of cracking. This outfall is connected to the corrugated metal drain pipes (located between the North Shop Pile and capped Evaporation Lagoon) that traverse to the river. These drainage pipes along with the pipes located at the Commentary Shot Pile were also inspected for signs of blockage.

Date(s) Inspected/Maintained: April 10, 2015; June 25, 2015; July 22, 2015; December 15, 2015

**Detention Pond**

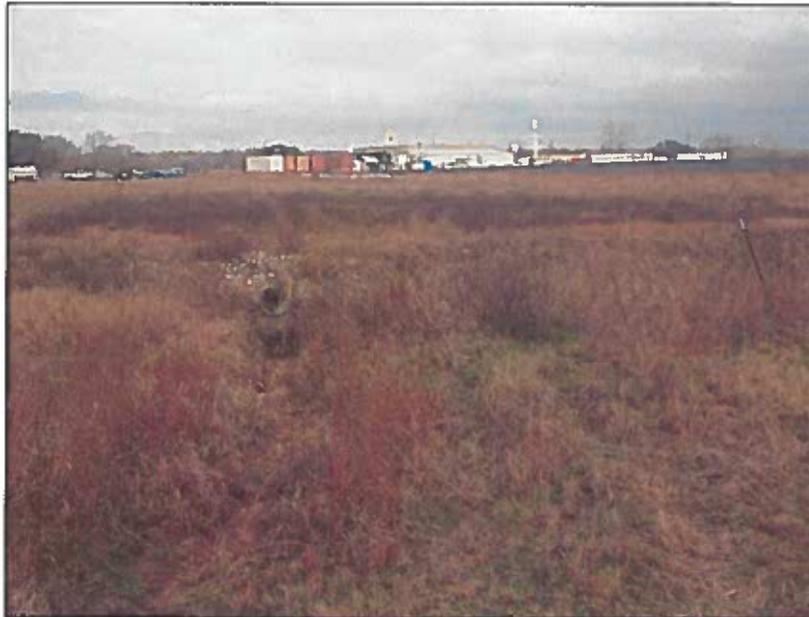


Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.050783, -97.441431 looking northwest



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**Detention Pond Outfall Culvert**



Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.050792, -97.441532 looking west

**Drainage Channel**



Photo Taken January 21, 2016

Location: Tract No. 10

Near 31.049893, -97.442375 looking north



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## **Item No. 6 – Articulated Concrete Blocks**

The City also inspects the articulating concrete blocks semiannually between Tract No. 8 and the Leon River. Although no damage was noted in 2015, any structural or vegetative issues are to be reported to TCEQ upon inspection. However, the City does maintain the infill soil and vegetation in the areas adjacent to the blocks, along the river bank, as required. The blocks and vegetation continue to be in good condition.

Date(s) Inspected/Maintained: June 25, 2015; December 15, 2015

## **Item No. 7 – Land Uses**

Tract No.8 is located north of Taylors Valley Road and is adjacent to the Leon River. The tract is owned and maintained by the City of Belton. The contaminated area (Tract No. 9) is not developed nor accessed by non-City staff. West of the property is known as the East Belton Cemetery and is maintained by the City of Belton. East of the property lies APAC Texas-Wheeler Company. All properties are zoned as heavy industrial.

Tract No. 10 includes Tract No. 11, the contaminated area, and Tract No. 12, the MatCon containment cell. This tract is undeveloped and lies between McGuire Truck and Auto Repair to the west and undeveloped land to the east owned by SMA Family Ltd. The property is bordered to the north by Georgetown Railroad right-of-way and to FM93 to the south. All properties are also zoned as heavy industrial.

Tract No. 13 south of FM 93 is considered uncontaminated. Nolan Creek borders the property to the west, FM 93 to the north, jointly owned City of Belton/City of Temple property to the east and southeast, and the property to the southwest is undeveloped and owned by the Bond family. All properties are undeveloped with the exception of the Temple-Belton Wastewater Treatment Plant located southeast of the tract. All areas are zoned as heavy industrial. After the property's lien release was issued, City Staff began the process to convey the property to the BEDC for marketing purposes. BEDC is currently working with an environmental engineering firm to perform a self-imposed Phase I environmental site assessment as well as a utility study to determine how the properties can be serviced by water and sewer. The formal conveyance to BEDC, proposed land use, and selling of the property will all be communicated with TCEQ.

## **Other Inspection Items**

If any damage is suspected at the MatCon cap during any inspection, TCEQ is to be notified for further review. The City does not perform any maintenance to the MatCon cap. No damage was suspected in 2015.



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The City plans to continue the current operation and maintenance activities on the property as required by the restrictive covenants and City institutional controls. Please contact me if you have any questions or concerns on these maintenance activities. I can be reached at (254) 933-5823 or via email at [apoints@beltontx.gov](mailto:apoints@beltontx.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Angellia C. Points', is written over the typed name.

Angellia C. Points, P.E.  
Interim City Engineer  
City of Belton

cc: Cynthia Hernandez, BEDC Executive Director  
Sam Listi, City Manager  
Neale Potts, Messer Potts & Messer  
John Messer, Messer Potts & Messer  
Aaron Harris, Grant/Special Projects Coordinator  
Byron Sinclair, Interim Public Works Director