



# RAILROAD COMMISSION OF TEXAS JUN 9 2003

## OIL AND GAS DIVISION

June 4, 2003

**COPY**

A TOFINA Petrochemicals Inc.  
15710 JFK Boulevard  
Houston, TX 77032  
ATTN: Mr. James Spicer

RE: Review of *Remediation Completion Report, ATOFINA Petrochemicals, Inc. Harbor Island Crude Terminal Port Aransas, Texas, November 2002.*

Dear Mr. Spicer:

I have completed my review of the Remediation Completion Report for the ATOFINA Harbor Island Crude Terminal (the Site). The report contains a description of soil remediation activities and the results confirmation sampling of residual TPH in soils and groundwater. The results of confirmation sampling performed in June and July 2002 reveal soil concentrations below the approved commercial/industrial cleanup level of 50,000 mg/kg for TPH. TPH concentrations in groundwater were reported to be below the laboratory reporting limit of 1.1 mg/L

Additionally, ATOFINA completed the following supplementary assessment activities under RRC supervision:

- January 10, 2003 – ATOFINA excavated soils at six locations interior to the Site to determine if light non-aqueous phase liquid hydrocarbons (LNAPL) exist in soils where the residual TPH concentrations exceeded 10,000 mg/kg. The excavations penetrated groundwater at about 2 to 3 feet below ground surface (bgs). A hydrocarbon sheen was observed on groundwater at each excavation location; however, LNAPL was not observed in soil.
- May 29, 2003 – ATOFINA gauged water wells at the Site to evaluate the extent of the hydrocarbon sheen previously observed on groundwater. Water levels were gauged with a NAPL/water interface probe and the wells were purged with bailers. LNAPL was not encountered and the hydrocarbon sheen was not observed in any of the monitor wells installed at the Site.

Based on the information described above, RRC staff concur with ATOFINA's conclusions that the soil remedial activities have achieved the remediation objectives for commercial/industrial purposes, and that constituents of concern were not detected in groundwater. Therefore, based

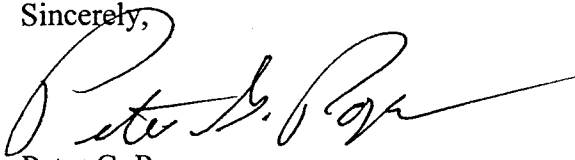
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on the information provided, remediation of the Site appears to be complete. RRC staff will issue a no-further-action (NFA) letter pending execution of an appropriate institutional control (e.g., Restrictive Covenant to restrict future land use to commercial/industrial purposes) and receipt of a photocopy of the file-stamped recorded document.

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If you have any questions please do not hesitate to call me at (512) 463-8202.

Sincerely,



Peter G. Pope  
Natural Resource Specialist  
Site Remediation Section

cc: Mr. Fermin Munoz, Jr., Director, RRC District 4 Office, Corpus Christi  
Mr. Brad Stokes, RMT Inc., 615 N. Upper Broadway, Ste 710, Corpus Christi, TX 78477  
Ms. Sarah Kowalski, Port of Corpus Christi, P.O. Box 1541, Corpus Christi, TX 78403