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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 14, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED #7003 0500 0003 2003 9392

Ms. Ellen Skoviera
Assistant Superintendent,
Business and Operations
Leander Independent School District
P.O. Box 218
Austin, TX 78646

Re: Leander Independent School District/Former Sasol North America, Inc. Facility
12024 Vista Parke Drive, Austin, Texas
TCEQ SWR No. 39312
EPA ID No. TXD987987914

Dear Ms. Skoviera:

The Texas Commission on Environmental Quality (TCEQ) staff have reviewed the letter report prepared by Weston Solutions, Inc. dated October 7, 2007 concerning several remaining issues at the Leander Independent School District (LISD) proposed Grandview Hills Elementary School facility (former Sasol). The purpose of this letter is to summarize our response to that letter report and to address other related issues.

Based upon the information submitted, we agree with your evaluation that the remaining metals in soil are either representative of background conditions, or will be excavated and properly disposed. Furthermore, it is our understanding that excavation has or will take place to remove polycyclic aromatic hydrocarbons and phthalates from several areas on the property. Within 30 days of completion of these excavation and confirmation sampling activities, please submit a report with supporting documentation to confirm successful completion.

We do not agree with your modeling efforts to support your opinion that groundwater is not impacted. Due to the karst environment and the absence of adequate on-site subsurface characterization, we do not believe that modeling is an appropriate approach to rule out a groundwater impact.

Therefore, the TCEQ requests that LISD and Sasol install at least one monitor well. The apportionment of the responsibility for completion of this activity is left to the two parties. However, within 30 days of the date of this letter, the TCEQ should receive a work plan detailing the proposed location(s), installation

Ms. Ellen Skoviera
Page 2
November 14, 2007

and sampling parameters for the monitor well(s). In the mean time, my staff are available to assist the parties in developing an acceptable work plan.

Earlier assessment activities documented detections of acid gases (i.e., hydrochloric acid and sulfuric acid) in indoor air samples above conservative screening levels. Weston staff have verbally stated in the past that these concentrations did not represent actual conditions but were the result of uncertainties pertaining to the quality of the data, the analytical method or other sampling related reasons. However, in the absence of sufficient documentation, the TCEQ considers this an unresolved issue that remains to be addressed. Within 30 days of the date of this letter, please submit appropriate written documentation on this issue.

Assuming successful excavation and reporting activities and appropriate resolution of the outstanding items referenced above, the TCEQ still believes the agency's environmental issues with the site can be resolved for its intended future use as a school.

Please direct any questions on this letter and all future inquiries on this site to Mr. Mark Riggle of my staff at (512) 239-3044.

Sincerely,



Alan R. Batcheller, P.G., Director
Remediation Division
Texas Commission on Environmental Quality

cc: Mr. Steve Morton, Moltz Morton O'Toole, LLP, 106 E. 6th Street, Suite 700, Austin, TX 78701.
Mr. Joseph Ledvina, Sasol North America Inc., 900 Threadneedle, Suite 100, Houston, TX 77079
Mr. Sam Coleman, EPA Region 6, Mail Code 6SF, 1445 Ross Avenue, Dallas, TX 75202
Waste Program Manager, TCEQ Region 11 Office, Austin