State of Kansas
Joan Finney, *Governor*

Department of Health and Environment
Azzie Young, Ph.D., *Secretary*

Reply to: (913) 296-0679
Fax (913) 296-1592

Zip

January 23, 1992

William E. Dame, Plant Manager
Ashland Chemical, Inc.
Drew Industries Division
302 Sunshine Road
Kansas City, Kansas 66115

Re: Ashland Chemical, Inc. Drew Industrial Division
EPA I.D. Number KSD000203638

Dear Mr. Dame:

On January 17, 1992, I visited Ashland Chemical, Inc.'s Drew Industrial Division (formerly Olin Water Services) located in Kansas City, Kansas to conduct an inspection of the closed hazardous waste storage area.

There were no visible stains on the floor of the concrete containment area that would indicate the spillage or release of hazardous waste. The concrete containment area was structurally sound and did not show any evidence of cracking. This letter represents KDHE approval of the implementation of the closure plan.

It is my understanding that a RCRA facility assessment (RFA) conducted by an EPA contractor is in the process of being finalized. The purpose of the RFA is to identify solid waste management units (SWMUs) and other areas of concern at a hazardous waste treatment, storage, and disposal (T/S/D) facility. The RFA is the first step in the corrective action process. EPA may require corrective action in those areas identified as being contaminated in the RFA.

If you have any questions, please call me at (913) 296-0679.

Sincerely,

Curtis D. Lesslie
Environmental Engineer
Hazardous Waste Section
Bureau of Air and Waste Management

C **Wes Bartley** - EPA Region VII
Lynda Ramsey - KDHE NEDO
Karen Carter - Ashland Chemical

R00011066
RCRA Records Center

RECEIVED
JAN 27 1992
PRMT SECTION

ROUTE SLIP

(Fold here)

Date 1-28-92

To Wes Bastley

EPA - RCRA Branch

- ___ Approval
- ___ Necessary action
- ___ Prepare reply
- ___ Comment
- ___ Note and return
- ___ Note and file
- ___ Investigate
- ___ Signature
- ___ Confer
- ___ As requested
- ✓ For information
- ___ Per telephone conversation

REMARKS

This is the information I told you we had. Your RFA contractor received a copy of the report and incorporated it into the draft RFA (dated 10-22-91) Product storage tanks are listed as "Areas of Concern".

(Fold here for return)

From / To: Steve Bieslawick

MI-548

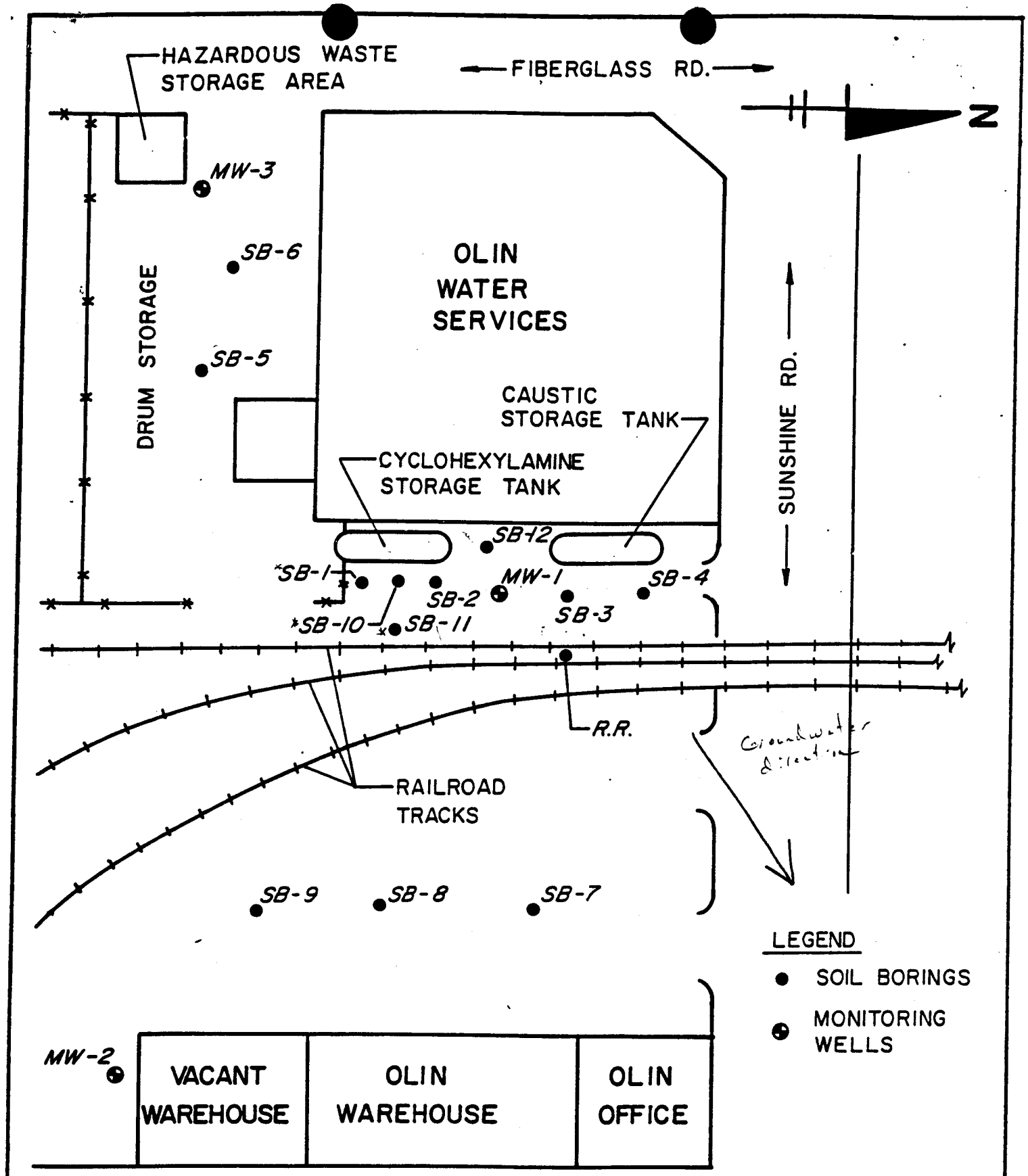

FIGURE 1

Civil & Environmental Consultants, Inc.

Power Plaza III • 700 Holiday Drive • Pittsburgh, Pennsylvania 15220
(412) 921-8402 • (800) 366-2234 • Fax (412) 921-1616

DATE: 12/1/89	APPROVED BY:	DWN. BY: M.T.M
SCALE: NTS		CHKD. BY:
SITE LAYOUT OLIN WATER SERVICES KANSAS CITY, KS		SHEET 1 OF 1
		DRAWING NUMBER 89208-A1

TABLE 1
SOIL SAMPLE VOLATILE ORGANIC RESULTS
(ug/kg)

Boring: Sample Depth (feet):	SB-1 1.5-4.0	SB-2 1.5-4.0	SB-5 1.5-4.0	SB-10 1.5-3.5	SB-11 1.5-3.5	RR Surface
Toluene	9.4	6.6	ND	ND	ND	35
Tetrachloroethylene	ND	17	ND	ND	ND	ND
Ethylbenzene	5.7	ND	ND	ND	ND	ND
Xylene	12	ND	ND	2,700	ND	16
Trichloroethylene (TCE)	ND	ND	58	ND	ND	ND
1,2-dichlorobenzene	ND	ND	ND	9,300	5,900	ND
1,4-dichlorobenzene	ND	ND	ND	1,700	ND	ND
Methylene Chloride	ND	ND	ND	ND	ND	8
Benzene	ND	ND	ND	ND	ND	7

*Positive results only.

TABLE 2*
SOIL SAMPLE SEMI-VOLATILE ORGANIC RESULTS
(ug/kg)

Boring: Sample Depth (feet):	SB-1 1.5-4.0	SB-2 1.5-4.0	SB-3 1.5-4.0	SB-4 1.5-4.0	SB-10 1.5-3.5	SB-10 5.0-7.0	SB-10 7.0-9.0	SB-11 1.5-3.5	RR Surface	Normal Background Concentrations**
Pyrene	ND	ND	ND	ND	2,100	ND	ND	ND	9,100	100
Naphthalene	ND	ND	ND	ND	520	ND	ND	ND	ND	--
Pentachlorophenol	ND	ND	ND	ND	22,000	ND	ND	ND	ND	--
Phenanthrene	ND	ND	ND	ND	930	ND	ND	ND	ND	--
Fluoranthrene	ND	ND	ND	ND	1,900	ND	ND	ND	ND	5 - 120
Benzo(a)anthracene[1]	ND	ND	ND	ND	1,300	ND	ND	ND	ND	20
Chrysene[1]	ND	ND	ND	ND	1,500	ND	ND	ND	ND	20
Benzo(b)fluoranthrene[1]	ND	ND	ND	ND	2,200	ND	ND	ND	ND	10
Benzo(k)fluoranthrene[1]	ND	ND	ND	ND	1,100	ND	ND	ND	ND	--
Benzo(a)pyrene[1]	ND	ND	ND	ND	1,600	ND	ND	ND	ND	50 - 75
Indeno(1,2,3-cd)pyrene[1]	ND	ND	ND	ND	1,200	ND	ND	ND	ND	--
Benzo(g,h,i)perylene	ND	ND	ND	ND	1,100	ND	ND	ND	ND	100
1,1,2,2-tetrachloro-ethane	260	280	500	310	ND	460	440	11	ND	--
2-methyl-2,4-pentanediol	2000	390	ND	ND	ND	ND	ND	ND	ND	--
N-methyl-N-nitroso-2-butanamine	690	ND	ND	ND	ND	ND	ND	ND	ND	--
Morpholine	990	270	ND	ND	370	ND	ND	330	ND	--
Cyclohexanone	ND	220	ND	ND	ND	ND	ND	ND	ND	--

* Positive results only.
**Reference: International Association for Research on Cancer, 1983

[1] Known or suspected carcinogen

TABLE 3
SOIL SAMPLE METALS RESULTS

Boring: Sample Depth (feet):	SB-1 1.5-4.0	SB-2 1.5-4.0	SB-3 1.5-4.0	SB-4 1.5-4.0	SB-10 1.5-3.5	SB-11 1.5-3.5	SB-12 1.0-3.0	Normal Background Concentrations**
Aluminum	15000	16000	27000	6800	9300	13000	7900	--
Antimony	<2.5	<2.6	3.1	<2.6	<4.9	<5.6	<5.2	--
Arsenic	20	8.5	17	9.8	3.7	9.6	2.3	6
Barium	210	220	280	210	110	260	88	430
Beryllium	1.2	1.2	1.1	0.87	<0.48	<0.56	<0.52	--
Cadmium	0.69	0.52	1.1	0.37	0.58	1.6	<0.51	0.50
Calcium	16000	14000	20000	33000	33000	11000	3300	--
Chromium	18	18	25	27	14	260	14	100
Cobalt	7.9	7.7	13	6.2	5.1	9.1	4.6	8
Copper	16	14	29	11	10	24	5.9	25
Iron	18000	17000	31000	16000	9700	19000	7200	--
Lead	23	22	36	15	18	33	10	10
Magnesium	7200	7000	7900	5700	3300	6700	1600	--
Manganese	340	1400	1600	460	310	810	190	850
Mercury	0.042	0.034	<0.033	<0.025	0.022	0.046	0.018	0.30
Nickel	17	25	28	13	11	21	9.5	40
Potassium	2200	3300	3800	1300	1600	2800	1000	--
Selenium					<0.97	<1.1	<1.0	0.50
Silver	<1.0	<1.0	<1.2	<1.1	<0.97	<1.1	<1.0	0.05
Sodium	390	370	430	320	940	2400	860	--
Thallium					<0.87	<1.1	<1.0	5
Vanadium	34	44	51	19	19	36	13	--
Zinc	56	72	82	52	46	100	32	50
Soil pH	7.9	7.7	8.1	8.0	9.7	9.1	8.4	

* All concentrations in mg/kg on dry weight basis
**Reference: Metals in Soils: A Brief Summary, Office of Toxic Substances, USEPA