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JUL 31 2014

Mr. Michael Stephenson
Senior Scientist
Cameron-Cole, LLC
50 Hegenberger Loop
Oakland, California 94621

RE: EPA approval with modifications of DRAFT RCRA Soil Interim Remedial Measure Work Plan, Clean Harbors Wichita Facility, 2549 New York Ave, Wichita, Kansas
RCRA ID # KSD007246846

Dear Mr. Stephenson:

The U.S. Environmental Protection Agency has completed review of the Response to Comments on *DRAFT RCRA Soil Interim Remedial Measure (IRM) Work Plan, Clean Harbors Wichita Facility, 2549 New York Avenue, Wichita, Kansas* (RCRA ID # KSD007246846) dated and received electronically on July 24, 2014.

The DRAFT RCRA Soil Interim Remedial Measure Work Plan, Clean Harbors Wichita Facility, 2549 New York Ave, Wichita, Kansas (IRM work plan) dated March 20, 2014, as revised by the Response to comments letter and associated documents dated July 24, 2014 (response to comments) and the revised Figure 13 Schedule submitted electronically July 25, 2014 is approved for implementation with the comments and/or modifications listed below. Please note: The EPA's approval of this IRM work plan is for corrective action purposes and does not directly apply to closure activities. All closure activities must be approved by the Kansas Department of Health and Environment.

The following EPA comments/modifications apply to the approval of this Soil IRM work plan:

1. The unnamed table titled "Reporting Limits and Detection Limits, IRM Confirmatory Samples, Clean Harbors Wichita".

    a. This table contains a column labeled "Closure". Information in this table column must be approved by KDHE. Please note, if compounds that have not been analyzed under corrective action are detected on site during closure sampling, additional investigation of these compounds may be required under corrective action.

    b. The Interim Action Objectives (IAO) column in this table contains multiple "NA" entries. NA is not defined on the table, but the EPA assumes this means either not available or not applicable. As indicated in your response to comments, if compounds with the IAO listed as NA are detected during this IRM work plan, these compounds must be evaluated during the Risk Assessment or Corrective Measures Study.

2. QAPP/SAP. The response to comments states that the SAP and QAPP approved by the EPA on September 9, 2013 for the Phase IV RFI will be used for activities conducted under the IRM work plan. It is Clean Harbors' responsibility to ensure that all necessary confirmation sampling activities are included or added, if necessary, to the approved QAPP/SAP via an approved addendum. This includes changes or additions of laboratories. Submitted addendums must specify the new or modified information and the reason for the change. The EPA has not received or approved an addendum for the use of Pace Laboratories yet.

AWMD/WRAP/MIRP/CJ/bft:07/30/14:H:AWMD/WRAP/Cores14/Jump:condappvlsoilIRM.docx

WRAP	WRAP
Jump	Johnson
07/31 /14	07/31/14

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3. Figure 13, Schedule. In comment 14, the EPA requested that a line item be added to the schedule for submittal and review of confirmation sample data prior to restoration. This information was not added to the schedule. The EPA will not require revision of the schedule at this time; however, as indicated in the response to comments, all final confirmatory sample results will be submitted to the EPA within 72 hours of completing the excavation and prior to backfilling, if possible. All confirmation sample locations and data, including samples that exceeded the IAOs and required additional excavation, must be documented in the final IRM Report.

4. Public Notice. The EPA was not informed that the public notice had been sent to the mailing list on July 16, 2014 and the EPA address on the mailing list attached to the response to comments is incorrect. Please submit the documents sent to the mailing list to my attention at the following address immediately:

U.S. Environmental Protection Agency
Region 7
Waste Remediation and Permitting Branch
11201 Renner Boulevard
Lenexa, Kansas 66219

5. Figure 9. The EPA notes that the depth of soil impacts on this figure are underestimated because many of the boring locations that show impacts in excess of the IAO down to 15 feet below ground surface (bgs) did not have any samples collected from intervals below 15 feet. For planning purposes, Clean Harbors should anticipate having to excavate these areas below 15 feet bgs. Examples of these locations include borings S4-1, S10-2, S11-5, S17-1, S18-1, and T5-4. The EPA also notes that boring location JC-14 in building J had 1,4-dioxane above the IAO at 2 feet bgs, but this is not shown on the figure. A revised Figure 9 is not required by the EPA; however, this information should be taken into consideration when implementing the IRM work plan.

6. All locations used to stockpile impacted soils must be clearly documented in the final IRM Report.

Upon Clean Harbors' written acknowledgement and concurrence with these comments and modifications, the IRM work plan will be considered approved as final.

If you have any questions about this conditional approval or these comments, please contact me by phone at (913) 551-7141 or by email at Jump.chris@epa.gov.

Sincerely,

Christine R. Jump, L.G.
U.S. EPA, Region 7
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: John Cook, KDHE BER
Akhter Hossein, KDHE BWM
Marty Smith, Clean Harbors