File

Cameron-Cole

July 25, 2014

Ms. Chris Jump
U.S. Environmental Protection Agency
Region VII
901 North 5th Street
Kansas City, Kansas 66101

RE: Second Quarter 2014 Progress Report
Clean Harbors Kansas, LLC
2549 New York Street, Wichita, Kansas
EPA Identification No: KSD007246846

Dear Ms. Jump;

As required by the Clean Harbors Kansas, LLC HSWA, Part II RCRA Permit, Conditions III.S.1. – 6., Clean Harbors Kansas, LLC (Clean Harbors) is providing this quarterly summary progress report covering activities that occurred during the Second Quarter 2014. The activities summarized in this report have been conducted pursuant to the corrective action provisions of Permit Condition III. This progress report contains information to comply with following permit conditions:

III.S.1. A description of all work completed during Second Quarter 2014.
III.S.2. A summary of all findings, including summaries of laboratory data.
III.S.3. A summary of all problems or potential problems encountered during the reporting period.
III.S.4. Deviations from the approved work plan(s), SAP's.
III.S.5. Projected work for the Third Quarter 2014 and,
III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

III.S.1 During the Second Quarter 2014 the following work was completed at the Clean Harbors Kansas Facility.

Routine groundwater monitoring was completed during the Second Quarter 2014. Water level measurements were collected from 26 wells on April 14, 2014. Groundwater and required QA/QC samples were collected from 21 wells on April 15 – 16, 2014. Water level measurements and sampling activities were completed in accordance with the sampling procedures described in the facility permit.

RCRA
533843

Conditional approval for Phase I of the Interim Remedial Measure (IRM) was received from EPA on May 6, 2014. Resolution of Agency comments for Phases II through IV or the IRM has continued throughout Second Quarter 2014.

Phase I of the IRM was initiated on May 27, 2014. Excavation of soil beneath Building J was initiated on May 28 and has continued through the date of this report. The excavation footprint of Building J increased beyond the dimensions presented in the IRM workplan due to soil concentrations exceeding IAOs in select sidewall and excavation floor samples. The excavation and backfill of Building J will conclude by July 30 and a data package with all final confirmation soil sample results will be submitted to EPA by August 11, 2014 (Final lab data anticipated to be received on or before August 7). It was necessary to backfill the Building J excavation prior to transmittal of final confirmation soil sample results to prevent caving of the excavation and structural damage to the building. The Building J excavation was extended to within five feet of the building wall in several locations.

On June 23, 2014, eight soil borings were completed in the northeast area of the site near Building J using Direct Push drilling technology. Soil samples were collected from each boring and analyzed for select VOCs including PCE, TCE, DCE, cis-1,2 DCE and VC. Analysis was performed using a mobile lab to further define the limits of the Building J excavation. Results obtained from this sampling effort will be included in the Building J excavation data package.

Decontamination of Building B was completed during First Quarter 2014 and analytical results from final rinsate samples were submitted to EPA and KDHE on July 11, 2014.

Decontamination of the Process Area and Building D continued. Remaining decontamination work consists of one room in Building D and collection of several samples from the Process Area.

A draft fact sheet describing the Interim Remedial Actions at the Wichita Facility was prepared and sent to EPA on June 18. The Fact Sheet was prepared for the public notice for the Interim Measures Work Plan (IRM) at the Wichita site.

III.S.2. A summary of all findings, including summaries of laboratory data.
The results of the one day drilling and sampling program will be provided in the Building J excavation data package to be submitted to EPA and KDHE by August 11, 2014. In summary, soil containing concentrations of PCE and 1,4-dioxane were encountered in interim confirmation soil samples. This finding led to expansion of the Building J excavation to the extent practicable or until soil IAOs were not exceeded in final confirmation soil samples.

III.S.3. A summary of all problems or potential problems encountered during the reporting period.

Screening of soil samples with a photo-ionizing detector (PID) and Flame Ionizing Detector (FID) did not yield readings consistent with the concentrations of PCE detected in soil confirmation samples. Field screening with these detectors consistently yielded low to non-detect results that have not proven useful in estimating excavation limits and determining when to collect confirmation samples. Clean Harbors is researching alternate field screening methods that will allow excavation limits to be more accurately estimated in the field and assist in determining when confirmation samples should be collected.

III.S.4. Deviations from the approved work plan(s), SAP's

As stated previously, the Building J excavation limits were expanded based upon interim soil confirmation samples.

III.S.5. Projected Work for the Third Quarter 2014:

Decontamination and rinsate sampling in the Process Area and in Building D will be completed during the Third Quarter 2014. Decontamination in Building C will also be performed. Following completion of decontamination activities, results of laboratory analysis performed on rinsate samples will be forwarded to KDHE and USEPA for determination of waste recycling/re-use and/or disposal options.

The Building J excavation data package will be transmitted to the agencies by August 17, 2014. Data packages for additional excavations will be transmitted for review within three days of receipt of all analytical data for confirmation samples from a particular excavation.

Upon completion of the Phase I interim actions,Phases II through IV of the IRM will be implemented as specified in the IRM workplan. Activities associated with Phases II through IV of the IRM include building demolition, soil excavation, backfill and site restoration. Updated schedules will be transmitted to the agencies periodically throughout the project to keep agency personnel apprised of specific activities planned.

The final response to comments for the IRM workplan will be submitted to the agencies during third quarter.

The Phase IV RFI report will be submitted during the third quarter 2014.

A semi-annual groundwater monitoring report documenting the results of sampling performed in April 2014 will be submitted during the third quarter 2014.

III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

No instances of non-compliance were reported or encountered during the reporting period.

Please do not hesitate to contact me with any questions regarding this report. I can be reached at 510-777-1864 (e-mail: mstephenson@cameron-cole.com).

Sincerely,

Mike Stephenson
Principal Scientist

cc: John Cook, KDHE
Akhter Hossain, KDHE
Mustafa Kamal, KDHE
John Martin, Clean Harbors Kansas, LLC
Martin Smith, Clean Harbors
Lon Stewart, Clean Harbors