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Cameron-Cole

June 10, 2014

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

Sent via email to Jump.Chris@epa.gov

RE: First 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 all activities that occurred during the First 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 First 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 Second 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 First Quarter 2014 the following work was completed at the Clean Harbors Kansas Facility.

Supplemental RFI Field Investigation conducted in January 2014. Field investigation consisted of 4 days of subsurface drilling activities. During that time period, approximately 144 soil samples were collected and analyzed for Volatile Organic Compounds (VOC) using test method 8260B using an onsite mobile laboratory. An additional 20 soil samples were collected for VOC analysis by a Kansas Certified Analytical Laboratory using test method 8260B. Ten samples

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were also collected for total organic carbon (TOC) analysis. All soil borings were backfilled in accordance with State of Kansas regulations. All sample locations were surveyed by a licensed Kansas surveyor. Analytical data generated from sample analysis was submitted with the DRAFT Interim Remedial Measures Work Plan and will also be provided as part of the Supplemental Remedial Feasibility Investigation (RFI) Report which will be submitted during the second quarter 2014.

Well decommissioning and additional supplemental subsurface investigation activities were completed during February 2014. Approval for well decommissioning activities was received from the Environmental Protection Agency (EPA) Region 7 via letter dated January 30, 2014. Twelve wells were decommissioned in accordance with the State of Kansas regulations. Appropriate documentation was submitted to the State of Kansas following completion of this activity. Eight soil borings were completed in addition to the well decommissioning activities at the site. Thirty two soil samples were collected and submitted to a Kansas certified laboratory for VOC analysis using test method 8260B. Analytical data was submitted with the DRAFT Interim Remedial Measures Work Plan and will also be provided as part of the RFI report in the second quarter 2014.

A conference call between Clean Harbors, EPA Region 7, State of Kansas, and Cameron-Cole personnel was held on February 27, 2014. The purpose of the call was to provide an update on the status of implementation of the Interim Measures at the Clean Harbors Kansas facility. Clean Harbors has decided that Thermal Treatment is no longer an Interim Measure being considered to remediate the site. Clean Harbors has decided to excavate soils impacted with contaminants that are above the KDHE TIER II Standards.

A Draft Interim Measures Work Plan (IMWP) was submitted to the USEPA Region 7 and the KDHE on March 20, 2014.

Decontamination of Buildings D and J and the Processing Area was performed during First Quarter 2014. Clean Harbors transmitted the results of Building J rinsate samples on March 21, 2014. Collection of confirmation samples from the Processing Area and Building D is scheduled for second quarter 2014.

III.S.2. A summary of all findings, including summaries of laboratory data.
The results of supplemental field investigations including all laboratory data were summarized in the DRAFT Interim Remedial Measures Work Plan and will be provided as part of the Phase IV RFI report which will be submitted during the second quarter 2014.

Well decommissioning activities were successfully completed during the first quarter 2014.

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

No problems or potential problems were encountered during the first quarter 2014 reporting period.

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

There were no deviations from work plans or Standard Operating procedures during the first quarter 2014 reporting period

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

Response to EPA/KDHE comments on the DRAFT Interim Remedial Measures Work Plan will be submitted to the EPA and KDHE for review.

Phase I corrective actions as described in the DRAFT Interim Remedial Measures Work Plan will be initiated.

Decontamination and rinsate sampling in Buildings B, D and C will continue during the Second Quarter 2014. 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.

Second Quarter groundwater sampling activities were completed in April 2014. A report summarizing the results of this activity 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: Akhter Houssain, KDHE
Mustafa Kamal, KDHE
John Cook, KDHE
John Martin, Clean Harbors Kansas, LLC
Marty Smith, Clean Harbors
Lon Stewart, Clean Harbors