File

Jump, Christine

From: Michael Stephenson <mstephenson@cameron-cole.com>
Sent: Monday, October 27, 2014 2:54 PM
To: Jump, Christine
Cc: SMITH, MARTIN L; Brady Gerber; sklaus@geostatenvironmental.com; Akhter Hossain; Mostafa Kamal; Lininger, Don
Subject: RE: CH Wichita Confirmation sampling
Attachments: Confirmatory Sample RL-MDL - revised 102714.pdf

Hello Chris,

Attached please find the revised table. Thank you for your prompt attention to this request. Please call me if you have any questions or concerns.

Sincerely,

Mike Stephenson
Principal Scientist
Cameron-Cole, LLC
50 Hegenberger Loop
Oakland CA 94621
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From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Thursday, October 23, 2014 2:48 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L; Brady Gerber; sklaus@geostatenvironmental.com; Akhter Hossain; Mostafa Kamal; Lininger, Don
Subject: RE: CH Wichita Confirmation sampling

The EPA approves Clean Harbors request to revise the previously approved confirmation sampling program. This revision reduces the analysis required under the IRM to include only VOCs by USEPA Method 8260 (including 1,4 dioxane by the SIM method) and 8 RCRA metals. Approval of this revision means that the *RCRA Soil Interim Remedial Measure (IRM) Work Plan, Clean Harbors Wichita Facility* is only addressing VOC and metal constituents identified above IAOs in previous investigations. This approval does not alter the sampling requirements for closure of the facility under the authority of KDHE. Please note that the approved reuse of concrete as backfill on site in areas excavated for the IRM does not exempt Clean Harbors from being required to collect final closure samples in those locations in the future, if necessary.

Please revise the table entitled Reporting Limits and Detection Limits, which was attached to the original request. The revised table should reflect the changes in this approval and be resubmitted to the EPA and KDHE.

Please contact me if you have any questions about this approval.

Chris Jump, L.G.
Waste Remediation and Permitting Branch

RCRA
534242

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From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Tuesday, October 21, 2014 3:08 PM
To: Jump, Christine
Cc: SMITH, MARTIN L; Brady Gerber; sklaus@geostatenvironmental.com
Subject: CH Wichita Confirmation sampling

Hello Chris,

I am writing to request a revision to the approved confirmation sampling plan for the IRM currently being executed at the CH Wichita site.

As you are aware, there have been some changes in the regulatory approach to this IRM since our final response to comments on the IRM workplan in July 2014. The confirmation sampling approach outlined in the attached table was intended to satisfy both corrective action and closure concerns. Since that time, KDHE has indicated that they will not consider the subsurface data obtained through confirmation sampling for the purposes of closure. Rather, Clean Harbors will be required to sample for the full list of analytes that the facility is permitted to accept prior to going through final complete closure of the facility.

Previous work performed at the Site as presented in the IRM workplan and DRAFT RFI phase IV report have identified the presence of select COCs at concentrations exceeding interim action objectives. These COCs are comprised of several VOCs, three metals and one SVOC. Other compounds (pesticides, herbicides, pcbs) were not detected in any samples at concentrations exceeding IAOs. Considering that there is no evidence that these compounds are present in site soils at levels of concern, and that data collected at this time will not be considered in a future application for closure of the facility, Clean Harbors is requesting that pesticides, herbicides and PCBs be dropped from the confirmation sampling program. These constituents were previously proposed (and approved) to be analyzed in 10 % of confirmation samples.

The one SVOC that was detected at concentrations exceeding IAOs was aniline. This compound was detected in two building D samples collected from the upper 2 feet of the soil column and in both cases, the sample collected at deeper depths did not contain aniline at concentrations above laboratory detection limits. The soils with aniline exceeding IAOs will be excavated, and existing data within Building D adequately characterize the lateral and vertical distribution of aniline as extremely limited. For this reason, Clean Harbors is also requesting the SVOCs be eliminated from the confirmation sampling program.

In summary, Clean Harbors wishes to revise the confirmation sampling program to include only VOCs by USEPA Method 8260 and RCRA 8 metals. Confirmation samples analyzed for these compounds will be sufficient to confirm that the IAOs have been achieved for all compounds detected above IAOs in all previous site work.

Please call or email me with any questions or concerns. As the excavation is proceeding rather quickly, we appreciate your prompt attention to this matter.

Thank you,

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Reporting Limits and Detection Limits
IRM Comfirmatory Samples
Clean Harbors Wichita

Compound	CAS No.	RL/PQL	MDL	IAO	Units	Phase I	Phase II	Phase III	Phase IV
Volatile Organic Compounds (USEPA Method 8260)									
Acetone	67-64-1	50	15	51600	ug/kg	X	X	X	X
Acrolein	107-02-8	25	11	NA	ug/kg	X	X	X	X
Acrylonitrile	107-13-1	25	7.8	NA	ug/kg	X	X	X	X
Benzene	71-43-2	5	1	168	ug/kg	X	X	X	X
Bromobenzene	108-86-1	5	1.1	NA	ug/kg	X	X	X	X
Bromochloromethane	74-97-5	5	1.9	NA	ug/kg	X	X	X	X
Bromodichloromethane	75-27-4	5	1	NA	ug/kg	X	X	X	X
Bromoform	75-25-2	5	1.1	NA	ug/kg	X	X	X	X
n-Butylbenzene	104-51-8	5	1	50900	ug/kg	X	X	X	X
sec-Butylbenzene	135-98-8	5	1	82700	ug/kg	X	X	X	X
tert-Butylbenzene	98-06-6	5	1	10000000	ug/kg	X	X	X	X
Chlorobenzene	108-90-7	5	1	5100	ug/kg	X	X	X	X
Chloroethane	75-00-3	5	2.3	128000	ug/kg	X	X	X	X
Chloroform	67-66-3	5	1.1	850	ug/kg	X	X	X	X
o-Chlorotoluene	95-49-8	5	1	NA	ug/kg	X	X	X	X
p-Chlorotoluene	106-43-4	5	1	NA	ug/kg	X	X	X	X
2-Chloroethyl vinyl ether	110-75-8	25	10	NA	ug/kg	X	X	X	X
Carbon disulfide	75-15-0	5	1	6710	ug/kg	X	X	X	X
Carbon tetrachloride	56-23-5	5	1.4	73.4	ug/kg	X	X	X	X
1,1-Dichloroethane	75-34-3	5	1	269	ug/kg	X	X	X	X
1,1-Dichloroethylene	75-35-4	5	1	85.9	ug/kg	X	X	X	X
1,1-Dichloropropene	563-58-6	5	1.1	NA	ug/kg	X	X	X	X
1,2-Dibromo-3-chloropropane	96-12-8	5	2.1	NA	ug/kg	X	X	X	X
1,2-Dibromoethane	106-93-4	5	1.8	NA	ug/kg	X	X	X	X
1,2-Dichloroethane	107-06-2	5	1	60	ug/kg	X	X	X	X
1,2-Dichloropropane	78-87-5	5	1	81.7	ug/kg	X	X	X	X
1,3-Dichloropropane	142-28-9	5	1	NA	ug/kg	X	X	X	X
2,2-Dichloropropane	594-20-7	5	1.4	NA	ug/kg	X	X	X	X
Dibromochloromethane	124-48-1	5	1	NA	ug/kg	X	X	X	X
Dichlorodifluoromethane	75-71-8	5	1.3	NA	ug/kg	X	X	X	X
cis-1,2-Dichloroethylene	156-59-2	5	1	855	ug/kg	X	X	X	X
cis-1,3-Dichloropropene	10061-01-5	5	1	NA	ug/kg	X	X	X	X
m-Dichlorobenzene	541-73-1	5	1	NA	ug/kg	X	X	X	X
o-Dichlorobenzene	95-50-1	5	1	48400	ug/kg	X	X	X	X
p-Dichlorobenzene	106-46-7	5	1.1	5940	ug/kg	X	X	X	X
trans-1,2-Dichloroethylene	156-60-5	5	1.3	1220	ug/kg	X	X	X	X
trans-1,3-Dichloropropene	10061-02-6	5	1	NA	ug/kg	X	X	X	X
1,4-Dioxane (8260 SIM)	123-91-1	5	2	38.4	ug/kg	X	X	X	X
Ethylbenzene	100-41-4	5	1	65600	ug/kg	X	X	X	X
2-Hexanone	591-78-6	25	4.9	140000	ug/kg	X	X	X	X
Hexachlorobutadiene	87-68-3	5	1	1100	ug/kg	X	X	X	X
Isopropylbenzene	98-82-8	5	1	65100	ug/kg	X	X	X	X
p-Isopropyltoluene	99-87-6	5	1	NA	ug/kg	X	X	X	X
4-Methyl-2-pentanone	108-10-1	25	5	6690	ug/kg	X	X	X	X
Methyl bromide	74-83-9	5	1.9	NA	ug/kg	X	X	X	X
Methyl chloride	74-87-3	5	2	NA	ug/kg	X	X	X	X
Methylene bromide	74-95-3	5	1.2	NA	ug/kg	X	X	X	X
Methylene chloride	75-09-2	10	4	42.9	ug/kg	X	X	X	X
Methyl ethyl ketone	78-93-3	25	7.5	24200	ug/kg	X	X	X	X
Methyl Tert Butyl Ether	1634-04-4	5	1	848	ug/kg	X	X	X	X
Naphthalene	91-20-3	5	2	349	ug/kg	X	X	X	X
n-Propylbenzene	103-65-1	5	1	110000	ug/kg	X	X	X	X

Reporting Limits and Detection Limits
IRM Comfirmatory Samples
Clean Harbors Wichita

Compound	CAS No.	RL/PQL	MDL	IAO	Units	Phase I	Phase II	Phase III	Phase IV
Styrene	100-42-5	5	1	9340	ug/kg	X	X	X	X
1,1,1,2-Tetrachloroethane	630-20-6	5	1.1	NA	ug/kg	X	X	X	X
1,1,1-Trichloroethane	71-55-6	5	1	2800	ug/kg	X	X	X	X
1,1,2,2-Tetrachloroethane	79-34-5	5	1.4	16	ug/kg	X	X	X	X
1,1,2-Trichloroethane	79-00-5	5	1.6	81	ug/kg	X	X	X	X
1,2,3-Trichlorobenzene	87-61-6	5	1.2	NA	ug/kg	X	X	X	X
1,2,3-Trichloropropane	96-18-4	5	1.9	NA	ug/kg	X	X	X	X
1,2,4-Trichlorobenzene	120-82-1	5	1.2	NA	ug/kg	X	X	X	X
1,2,4-Trimethylbenzene	95-63-6	5	1	1070	ug/kg	X	X	X	X
1,3,5-Trimethylbenzene	108-67-8	5	1	5510	ug/kg	X	X	X	X
Tetrachloroethylene	127-18-4	5	1.3	121	ug/kg	X	X	X	X
Toluene	108-88-3	5	1	51200	ug/kg	X	X	X	X
Trichloroethylene	79-01-6	5	1	84.2	ug/kg	X	X	X	X
Trichlorofluoromethane	75-69-4	5	1	NA	ug/kg	X	X	X	X
Vinyl chloride	75-01-4	5	1	20.5	ug/kg	X	X	X	X
Vinyl Acetate	108-05-4	25	8	NA	ug/kg	X	X	X	X
m,p-Xylene		10	1.6	NA	ug/kg	X	X	X	X
o-Xylene	95-47-6	5	1.1	809000	ug/kg	X	X	X	X
RCRA 8 Metals (USEPA Method 6010/6020)									
Arsenic	7440-38-2	0.5	0.1	63.2	mg/kg	X	X	X	X
Barium	7440-39-3	10	0.05	277000	mg/kg	X	X	X	X
Cadmium	7440-43-9	0.2	0.025	965	mg/kg	X	X	X	X
Chromium	7440-47-3	0.5	0.05	111	mg/kg	X	X	X	X
Mercury (7470/7471)	7439-97-6	0.041	0.0041	20	mg/kg	X	X	X	X
Lead	7439-92-1	1	0.08	1000	mg/kg	X	X	X	X
Selenium	7782-49-2	1	0.15	10200	mg/kg	X	X	X	X
Silver	7440-22-4	0.5	0.0325	10200	mg/kg	X	X	X	X

RL/PQL - Reporting Limit or Practical Quantitation Limit
MDL - Method Detection Limit
IAO - Interim Action Objective for compounds detected duirng previous RFI phases. No IAOs are proposed for compounds not detected to date
ug/kg - micrograms per kilogram
mg/kg - milligrams per kilogram
X - Denotes that confirmation sampling for the specified analyte will be performed
VOCs are to be analyzed in every confirmation sample collected
Metals are to be analyzed in all confirmation samples from the Northeastern Corner and Processing Area excavations
Metals are to be analyzed at a frequency of 10% of the VOC samples in other areas of the Site