



Michael F. Easley, Governor
William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources
Alan W. Klimek, P.E. Director
Division of Water Quality

June 7, 2005

Dan Smading
Flint Hills Resources, LP
P. O. Box 2302
Wichita, Kansas 67201-2256

Subject: **June 2005 Revised Remedial Actions**
Flint Hills Resources, LP – North Terminal
3325 River Road
Wilmington, NC

Dear Mr. Smading:

On June 3, 2005, the Division of Water Quality, Aquifer Protection Section (APS) received the June 2005 Revised Remedial Actions letter, submitted on your behalf by Catlin Engineers and Scientists (Catlin), for the subject site. The letter proposes revised groundwater remediation activities for the Paraxylene Facility and revised soil remedial activities for the Loading Rack Area.

The proposed revisions to the groundwater remediation activities in the Paraxylene Facility include the use of groundwater recovered from site recovery and/or monitoring wells (treated with Fenton's Reagent) in the continuous application of site-specific concentrations of Fenton's Reagent to remediate groundwater impacts at the site. The proposed remediation system will initially operate as a pilot test, followed by modifications, as needed, and full-scale implementation. The efficiency of the system will be evaluated on a weekly basis for the first month and bi-weekly thereafter.

The proposed revisions to the soil remediation activities in the Loading Rack Area include the continuous application of site-specific concentrations of Fenton's Reagent to the surface soil in the impacted area. The proposed revisions will initially be implemented as a pilot study, followed by modifications, as needed, and full-scale implementation.

The APS does not object to the implementation of the revised remedial actions proposed for the Paraxylene Facility or the Loading Rack Area. Please proceed with implementation of the proposed revisions. If you have any question or require any additional information regarding this matter, please contact Sam Watson or myself at (910) 796-7215.

Yours very truly,

Charles F. Stehman, Ph.D., P.G.
Environmental Regional Supervisor I

CFS/SPW
cc: WiRO, APS
Elizabeth R. Page, Reiss Remediation, LLC
Jeff Becken, Catlin Engineers and Scientists
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