



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

November 28, 2006

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

Subject: **Remediation Update Report for
August 2005 to February 2006**
Former Flint Hills Resources – North Terminal
3325 River Road
Wilmington, NC

Dear Mr. Smading:

The Division of Water Quality (DWQ) has received the subject report prepared and submitted on your behalf by Catlin Engineers and Scientist. Thank you for providing us with this document.

Review of the data presented in the report indicates that, in general, the contaminant concentrations in the p-xylene area (PX Area) and loading rack area (LRA) are consistent with previous reports concerning magnitude and distribution. The review also indicated increases in methyl tert-butyl ether (MTBE) in monitoring wells KMW-15 and KMW-16, and the continuing presents of PX at KMW-5 at relatively high concentrations that are not easily attributable to apparent impacted areas or groundwater flow conditions at the various areas of concern. The apparent inability to attribute these occurrences to current conditions at the site may simply reflect the historical division in how the data has been reviewed (as two separate areas). The additional data provided by the latest and proposed assessment of the Gasoline/#2 Fuel Oil Area (GFOA) may provide the needed information to explain these occurrences. It should be noted, however, that if evaluation of this additional data cannot sufficiently explain the increase in MTBE, then additional assessment will be required in the area bound by well KMW-16 in the LRA, wells 1 and 2 in the GFOA, and well 119 in the PX Area.

The DWQ does not object to the recommendations proposed in the report with the exception of the abandonment of the recovery wells. The DWQ requests that the recovery well remain in place at this time. Please continue remediation and monitoring activities as proposed with the above mentioned exceptions. If you have any question or require any additional information regarding this matter, please contact me at (910) 796-7380.

Yours very truly,

A handwritten signature in black ink that reads 'Samuel P. Watson'.

Samuel P. Watson
Hydrogeologist I

cc: WiRO-APS
Elizabeth R. Page, Reiss Remediation
Jeff Becken, Catlin Engineers and Scientists
Flint Hills Resources LP North Terminal

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