



January 15, 2005

G-Logics File Number 01-0109-B

Mr. Michael Sibley II

U.S. Environmental Protection Agency Region 10, Emergency Response Unit

1200 6th Avenue, ECL-116-MS

Seattle, WA 98101

Subject: Progress Memo, January 15, 2005
Completed Removal Actions
Administrative Order on Consent, Docket No. CWA-10-2004-0039
Japanese Auto Wrecking Site on BB5/BB7 Property
Kent, Washington

Dear Mr. Sibley:

In accordance with the authorized Administrative Order on Consent, please find our status letter for tasks completed for the period between December 16, 2004 and January 15, 2005. An updated schedule also is attached to this letter.

Early-action VES Status

The VES continues to operate with air samples collected periodically from the combined flow stack (Exhaust). Air flow rates are calculated each time an exhaust sample is collected and periodically from the individual extraction wells when samples are collected and/or when samples are not collected). Flow rates shown below are actual calculations. Recent results also are shown below.

Date/Sample Location	Calculated lbs per day*		Flow Rate (cfm)
	Benzene	Gasoline	
December 17, 2004			
Exhaust	3.17	158.32	122.5

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01-0109-B-Jan 2005 Progress Memo To EPA With Logo.Doc

Date/Sample Location	Calculated lbs per day*		Flow Rate
	Benzene	Gasoline	(cfm)
December 23, 2004			
Exhaust	2.64	179.43	122.5
December 29, 2004			
Exhaust	2.67	164.15	119.07
January 6, 2005			
EW-1	--	--	21.67
EW-2	--	--	43.56
EW-3	--	--	26.576
EW-4	--	--	34.32
EW-5	--	--	34.32
Exhaust	3.27	200.54	122.5
January 13, 2005⁽¹⁾			
Exhaust	4.68	311.74	139.16

*Calculation based on measured vapor concentrations multiplied by flow rates then divided by 23 hours (blower turned off daily for approximately 1 hour while knockout tank drains). -- Sample not collected.

⁽¹⁾ Two samples were submitted to Advanced Analytical for analysis (numbers shown represent both samples). Two samples were submitted to North Creek Analytical for analysis (numbers available 1/17/05). Samples submitted to North Creek Analytical were included for quality control.

PSCAA Permit Request

The air monitoring results indicate the system is removing contaminants from this area at a rate higher than anticipated, as initially calculated. This may be due to the system removing volatile contaminants from areas outside of the identified gasoline-disposal pit.

Consequently, G-Logics consulted with the Puget Sound Clean Air Agency (PSCAA) regarding the need for a permit and/or control equipment and filed a permit application with PSCAA. EPA's assistance may be needed to facilitate prompt processing of a permit and/or approval of control equipment if required for the removal action. Should PSCAA conclude that additional expensive controls may be needed on the system, G-Logics would likely reduce the VES flow rate as discussed at our January 5 meeting with EPA.

Meeting with EPA

On January 5, 2005, a meeting was held at EPA offices to discuss the findings of the early action VES and to receive comments on the draft Remedial Options Report. From this meeting, the following action items were identified. Key tasks and dates have been included in the revised schedule.

Informational items

- Update Table 1 VES Air Sample Analysis to identify assumed and actual flow rates and/or other qualifiers, and include Table 1 VES Air Sample Analysis in final Remedial Options Report.
- Provide EPA (Shawn Blocker/RCRA) with VES Well construction information.
- Provide EPA and E&E an updated/current base-map aerial photograph so that all site reviewers are working from the same site map.

January/February Round of Groundwater Sampling

- Prepare draft groundwater sampling workplan by January 21, 2005 (receive comments back by January 25, 2005).
- Begin groundwater sampling approximately January 31, 2005 (or beginning of February 2005).
- Use January/February round of groundwater sampling to: (i) check for free product in GMW-03; (ii) update groundwater data by collecting samples from current G-Logics and E&E's wells and submitting for gasoline and BTEX analysis; and (iii) review/determine best approach and/or method to collect and provide radius of influence data and preliminary contaminant transport to Green River data.

Final Remedial Options Report

- Submit a draft technical memorandum for remedial objectives, remediation levels, and related cleanup standard/point of compliance recommendations by February 28, 2005, assuming laboratory analysis for the above mentioned round of groundwater sampling is available. The substance of the draft memo, when approved by EPA, will be incorporated into Section 4.2 of the final Remedial Options Report.
- Submit final Remedial Option Report (including cleanup action plan appendix) by March 31, 2005. This schedule is based on prior EPA review and completion of the groundwater sampling and technical memorandum tasks above.

- As noted in the transmittal letter and footnote 2 of the draft Remedial Options Report, certain sections were reserved pending EPA's comments and preference on the format and timing of the final report. EPA determined that a single final report with the reserved material on remedial levels and related contingency action triggers be prepared, which will also serve as an integrated Feasibility Study/Cleanup Action Plan for substantial equivalence with MTCA. In response to EPA's comments on the draft Remedial Options report, the final report will include applicable VES and groundwater information, which will assist in selecting a final remedial option after additional discussions with EPA.

Schedule

The attached schedule shows the tasks completed to date. The submittal date for the final Remedial Option Report was established during the January 5, 2005 meeting with EPA and is based on the completion of the January/February round of groundwater sampling and the technical memorandum on remediation levels, both of which have also been added to the task schedule. The schedule has been updated accordingly.

Conclusion

Please feel free to contact us if you have questions regarding the completed work, the presented information, or the remaining tasks and schedules. After your review, please confirm receipt of this progress report and approval of the revised schedule.

Sincerely,
G-Logics, Inc.

Rory L. Galloway, LG, LHG
Principal

Attachments: Key Tasks and Planned Schedule

cc Mr. Brad Corner
Mr. William Chapman / Mr. Kenneth Weiner / Ms. Holly Harris
Mr. Alan Tonnon
Mr. John Briggs
Mr. Shawn Blocker

Key Tasks and Planned Schedule

Task Activity	Schedule
E&E Data Corrections, Consolidation, and Organization	Completed
Draft Workplan Preparation	Completed
Health and Safety Plan Preparation	Completed
Utility Locate	Completed
Field Labor, Boring Locations (grid) and Equipment Setup	Completed
G-Logics Field Labor, Drilling	Completed
Strataprobe Driller (soil borings, well materials, labor, and start cards)	Completed
Soil Cuttings Drums	Completed
Mobile Laboratory Soil Analysis	Completed
Interim VES System Siting Review	Completed
AOC Signed by the EPA	Completed
Revised Draft Workplan Preparation	Completed
Health and Safety Plan Preparation	Completed
EPA Workplan and H/S Plan Comments	Completed
Progress Report	Not Applicable
Final Workplan Preparation	Completed
Final Health and Safety Plan Preparation	Completed
VES System Design Submitted to EPA	Completed
G-Logics Field Labor, Well Sampling	Completed
EPA Approval of VES Design	Completed
Groundwater Elevation Survey Measurements (new and existing wells)	Completed
Groundwater Sample Analyses and Review	Completed
Document Removal/Disposal of 2,500-gallon AST on BB7 Property	Completed
Progress Report, October 15, 2004	Completed
VES System Installation, Recovery Well Installation	Completed

Task Activity (continued)	Schedule
VES System Installation, Blower and Piping Installation, Week of	Completed
Draft Site Exploration Report Preparation and Submittal for EPA	Completed
Draft Report, EPA Comments	Completed
Final Report Preparation and EPA Submittal	Completed
Progress Report, November 15, 2004	Completed
Draft Remedial Option Review Document	Completed
Remedial Options, EPA Comments	Completed
Progress Report, December 15, 2004	Completed
EPA Meeting, January 5, 2005	Completed
Draft Groundwater Sampling Workplan	January 21, 2005
EPA Comments/Approval of Draft Groundwater Sampling Workplan	January 25, 2005
Finalize/implement Groundwater Sampling Workplan	January 31, 2005
Progress Report, February 15, 2005	February 15, 2005
Submit Technical Memo re Section 4.2 (remediation levels)	February 28, 2005
EPA Comments/Approval of Technical Memo	Early March 2005
Final Remedial Option Report	March 31, 2005*
Final Removal Action Report	TBD

* Assumes completion, EPA review and concurrence on prior tasks. Per January 5, 2005 meeting, date may be revised if prior tasks are not yet completed.