



December 2, 2011

Ms. Holly Burke
Environmental Scientist
Remedial Section/Site Restoration Unit
KDHE Bureau of Environmental Remediation
1000 SW Jackson Street, Suite 410
Topeka, KS 66612-1367

RE: Response to Comments on Monitoring and Maintenance Plan
Phytoremediation Interim Measure
Former Unocal Chemical Distribution Facility
2100 East 37th Street North
Wichita, Kansas 67219

Dear Ms. Burke:

This letter is intended to document the responses to KDHE's comments on the Phytoremediation Interim Measure (IM) Monitoring and Maintenance (M&M) Plan that were provided in a letter dated October 24, 2011. URS Corporation (URS) has prepared this letter on behalf of the Chevron Environmental Management Company (EMC).

Chevron EMC agrees to include USD-MW-18 (located between USD-1 and USD-2) during the water level gauging events, as shown in the revised Figure 3 (attached). As stated in the M&M Plan, water level measurements will be collected periodically until the stands attain canopy closure (anticipated in 2013). Hydraulic monitoring may occur more frequently during the 2013 through 2015 growing seasons, after the trees begin to remove significant volumes of groundwater.

In response to KDHE's comment, Chevron EMC has amended Section 4.6 to read as follows:

4.6 Management of Plant and Organic Waste

Since pruning of the trees is not necessary, the leaf is the only part of the tree that will be displaced on a regular basis, as the willows are deciduous. While the leaves quickly transpire chlorinated volatile organic compounds (cVOCs) to the atmosphere, the constituents do not accumulate in the leaf tissue. Therefore, cVOCs will not be present in the leaves when they fall to the ground.

Other organic wastes that may be generated at the site include tree poles that have not shown significant growth and old mulch. Organic wastes that have come in contact with contaminated groundwater (i.e., tree poles) or were associated with a living tree (i.e., dead branches) will be managed as investigation derived waste (IDW), properly containerized, and disposed of based on analytical results. Organic wastes that have not come in contact with contaminated groundwater (i.e., old mulch present on top of the plastic weed barrier) have limited to no potential for exposure to cVOC contamination. Therefore, this waste will be managed as typical plant waste and spread around the site.

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If you have any questions or comments please feel free to contact me at 512-419-6180 or Anna Kunkel at 512-419-6915.

Respectfully Submitted,
URS Corporation

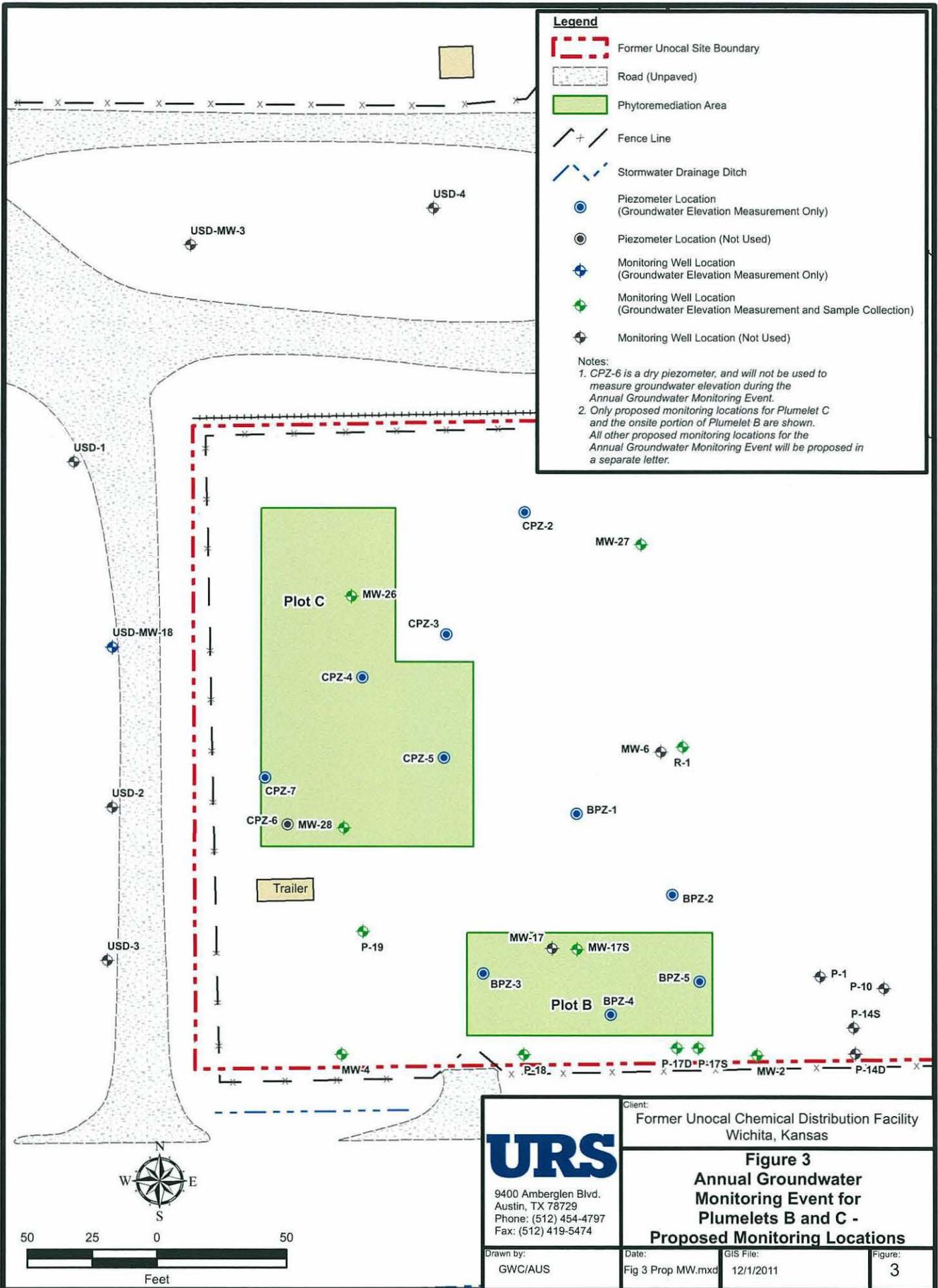
A handwritten signature in black ink, appearing to read "Derek Peacock". The signature is written over the text "Respectfully Submitted, URS Corporation" and "Derek Peacock, P.E. Project Manager".

Derek Peacock, P.E.
Project Manager

Attachment

cc: Mr. Michael P. Mailloux (Chevron EMC)
Mr. Chris Carey (KDHE → Unocal File – C2-087-00431)
File

Q:\Unocal-Wichita\Drawings\Phyto_M&M_Plan\Fig 3 Prop MW.mxd 12/11/2011 @ 10:37:52 AM

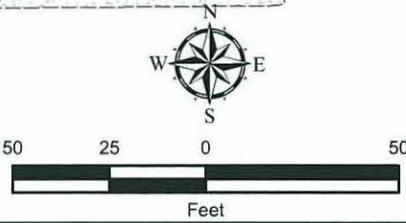


Legend

- Former Unocal Site Boundary
- Road (Unpaved)
- Phytoremediation Area
- Fence Line
- Stormwater Drainage Ditch
- Piezometer Location (Groundwater Elevation Measurement Only)
- Piezometer Location (Not Used)
- ⊕ Monitoring Well Location (Groundwater Elevation Measurement Only)
- ⊕ Monitoring Well Location (Groundwater Elevation Measurement and Sample Collection)
- ⊕ Monitoring Well Location (Not Used)

Notes:

1. CPZ-6 is a dry piezometer, and will not be used to measure groundwater elevation during the Annual Groundwater Monitoring Event.
2. Only proposed monitoring locations for Plumelet C and the onsite portion of Plumelet B are shown. All other proposed monitoring locations for the Annual Groundwater Monitoring Event will be proposed in a separate letter.



<p>9400 Amberglen Blvd. Austin, TX 78729 Phone: (512) 454-4797 Fax: (512) 419-5474</p>	Client: Former Unocal Chemical Distribution Facility Wichita, Kansas		
	<p>Figure 3 Annual Groundwater Monitoring Event for Plumelets B and C - Proposed Monitoring Locations</p>		
Drawn by: GWC/AUS	Date: Fig 3 Prop MW.mxd	GIS File: 12/1/2011	Figure: 3