

GRCB 2004

GRCB - email 9/1/04

ENTERED

8/11/04 Release/discovery

## Release North of MW#45

### Progress Recap, and Plan Forward

#### Progress Recap

Giant has completed the tasks set forth in the OCD Emergency directive. The removal of the impacted soil has been removed and placed in a series of staging piles. Composite samples have been taken from the staging piles and sent to the lab (Envirotech) to be analyzed for the following:

TPH – GRO & DRO

TCLP – RCRA 8 metals and BTEX

Reactivity, Corrosivity, and Ignitability

Flash Point - using Pensky-Martens closed cup test.

The disposition of the staging piles will be determined by sample results.

Giant has completed the construction of the containment dikes at the point of origin in four separate areas that showed signs of seepage. The containment structure North of MW #45 is the only one that has accumulated liquid. A containment structure was also constructed at the bottom of the draw North of Monitoring Well #45. HDPE liners were installed in all containment structures.

Giant continues to recovery fluids from Monitoring Well #45.

#### Plan For Future Protection

Giant has contracted with Malcolm Pirnie an environmental consulting and engineering firm to provide a list of items required to complete engineering on an improved groundwater containment and recovery system. Giant will review this list of tasks and approve those items it deems necessary to complete the engineering. Listed below is a timeline Giant proposes to meet:

- September 8 – Completion date for engineering task list by Malcolm Pirnie for Giant to review.
- November 1 – Completion date for engineering tasks approved by Giant and recommended plan of action.
- November 10 – Completion date for Giant's review/approval of engineering task results and plan of action.
- November 17 – Due date to have plan of action distributed to the EPA, OCD and NMED for their review.

Once the plan of action is approved by the agencies, Giant can proceed with obtaining bids for the work and provide a project completion date.