



OUR CLIENTS DEMAND A SMARTER SOLUTION

2923 South Tryon Street
Suite 100 Charlotte, NC
28203-5449

704-586-0007 phone
704-586-0373 fax
www.harthickman.com

Via USPS and E-mail

November 10, 2011

State of Washington - Dept of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504

Attention: Mr. Gene Radcliff, L.G.

Re: RAWP Addendum Deviation Request
Former Clariant Corporation Facility
Kalama, WA
Facility No. 24634187
VCP Project No. SWO492
H&H Job No. CLR-045

Dear Gene:

On behalf of Clariant Corporation (Clariant), Hart & Hickman, PC (H&H) is submitting this request for a deviation from plans proposed in our Post-Injection Monitoring Report & RAWP Addendum, dated July 5, 2011. The RAWP Addendum included plans for calcium polysulfide (CaSx) injection and ground water re-circulation at the former Clariant facility located at 404 Hendrickson Drive in Kalama, Washington.

The RAWP Addendum included installation of six new horizontal injection wells for injecting CaSx to remediate leachable zinc in soil below the depth of the previous soil excavation conducted in a portion of the former settling basin #2 (FSB2) area. However, instead of installing and utilizing horizontal wells for this purpose, we now plan to excavate soil in the FSB2 area to a depth of approximately 15 ft bgs and apply CaSx solution directly to the base of the excavation area. The CaSx will either be applied as an undiluted solution to the base of the excavation or it may be diluted with municipal water within on-site frac tanks prior to application to the base of the excavation. It will not be mixed with ground water prior to application. After application to the base of the excavation, the CaSx solution will be allowed to infiltrate into the soil.

Mr. Gene Radcliff
November 10, 2011
Page 2

The planned extent of the excavation and CaSx application area is shown in the attached figure. Note that the planned extent of excavation is within the lateral extent of previous excavations that also extended to a depth of 15 ft bgs and were backfilled with clean soil. It is possible that the soil excavation and CaSx application will be conducted in smaller sub-portions of the area instead of excavating the entire area and then applying the CaSx.


Following completion of CaSx application to the base of the excavation, the excavation will be backfilled with the soil that was excavated from the area, and CaSx injection and re-circulation activities will be performed using the existing injection well network as proposed in the RAWP Addendum.

With the Department of Ecology's approval, we would like to begin the remedial activities as described herein and in the RAWP Addendum on November 29, 2011.

Should you have any questions or need any additional information, please feel free to contact us.

Sincerely,

Hart & Hickman, PC



Steven C. Hart
Principal



Christie Zawtocky, PE
Project Manager

cc: Ms. Mary Shaleen-Hansen (via USPS and e-mail)
Bill Grier (via e-mail)
Ron Walton (via e-mail)
Steve Klaeren (via e-mail)

Attachment



