



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

April 30, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED # P 005 008 019

Mr. Scott Munson  
Sequoyah Fuels Corporation  
I-40 and Highway 10  
Gore, Oklahoma 74435

RE: Ground Water Monitoring Interim Measures Workplan  
Sequoyah Fuels Corporation  
EPA RCRA 3008(h) Corrective Action Order  
U.S. EPA Docket No. VI-005-(h)93-H  
EPA ID # OKD051961183

Dear Mr. Munson:

The United States Environmental Protection Agency - Region 6 (EPA) is in receipt of Sequoyah Fuels Corporation's (SFC) letter dated July 31, 1996, which requests a modification to the schedule contained in the SFC Final Groundwater Monitoring Interim Measures (GMIM) Workplan. The Final GMIM Workplan was submitted by SFC on December 9, 1993, and subsequently approved by EPA on December 15, 1993, pursuant to Section VI of the Administrative Order on Consent (Order), EPA Docket No. VI-005-(h)93-H, dated August 3, 1993.

EPA has performed a technical review of the information contained in SFC's request letter dated July 31, 1996, to determine if it fulfills the requirements of the Order. Since SFC has completed a majority of the activities required by Section VI.2. (RCRA Facility Investigation) of the Order, EPA approves SFC's request to modify the schedule contained in the SFC Final GMIM Workplan.

In accordance with the provisions of Section XVI of the Order, the EPA is providing, for your signature, a modification to the schedule within the SFC Final GMIM Workplan. This modification does not effect any other terms of the Order. Modification of the Order will become effective and incorporated into the Order upon signature by the Director of the Compliance Assurance and Enforcement Division. Please sign the enclosed modification and return it to EPA. EPA will transmit you a copy of the modification once it has been signed and filed with the Regional Hearing Clerk.

9705140113 970430  
PDR ADOCK 04008027  
C PDR



If you have any questions, please contact me at  
(214) 665-8315.

Sincerely yours,

*Michael A. Hebert*

Michael A. Hebert  
Technical Section (6EN-HX)  
Hazardous Waste Enforcement Branch

Enclosure

cc: Mr. Jim Shepherd	(NRC)
Mr. Dwayne Beavers	(Cherokee Nation)
Ms. Kathy Peter	(USGS)
Mr. Loren Mason	(USACE)
Mr. Dan Martin	(USF&W)
Mr. Earlon Shirley	(ODEQ)
Mr. Lance Hughes	(NACE)

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6

IN THE MATTER OF:	)	
	)	
	)	
SEQUOYAH FUELS CORPORATION	)	ADMINISTRATIVE
SOUTH HIGHWAY 10	)	ORDER ON CONSENT
	)	
GORE, OKLAHOMA 74435	)	
	)	
	)	
RESPONDENT	)	U.S. EPA DOCKET NO.
	)	VI-005-(h)93-H
	)	
EPA I.D. NO. OKD051961183	)	PROCEEDING UNDER SECTION
	)	3008(h) OF THE RESOURCE
	)	CONSERVATION AND RECOVERY
	)	ACT, AS AMENDED, 42 U.S.C.
	)	Section 6928(h).
	)	
	)	

**MODIFICATION TO THE ORDER**  
(Modification No. 1)

**I. INTRODUCTION**

The above entitled Administrative Order on Consent (Order) was issued on August 3, 1993, to Sequoyah Fuels Corporation (SFC), owner and/or operator of the Sequoyah Fuels Corporation facility located on Highway 10, Gore, Oklahoma. Pursuant to Section VI of the Order, SFC was required to submit an approvable draft Groundwater Monitoring Interim Measures (GMIM) Workplan. SFC fulfilled this requirement by submitting a draft GMIM workplan on or about September 7, 1993. SFC subsequently modified the draft GMIM workplan pursuant to comments by the United States Environmental Protection Agency, Region 6 (EPA) and submitted a Final GMIM Workplan on or about November 23, 1993. On or about December 15, 1993, EPA approved the Final GMIM workplan. Pursuant to Section VI of the Order, SFC initiated implementation of the GMIM workplan after receipt of EPA's approval.

Pursuant to Section XVI of the Order, the Order may only be amended by mutual agreement of the Parties (i.e., EPA and SFC). On or about July 31, 1996, SFC requested a modification to the approved schedule of the GMIM workplan (Attachment 1). The revised schedule to the GMIM workplan proposed by SFC is contained in a report entitled, "Groundwater Monitoring Program, June 1996", prepared by TITAN Environmental Corporation (Attachment 2). On or about March 20, 1997, EPA provided SFC verbal comments concerning the revised schedule to the GMIM workplan proposed by SFC.

SFC provided responses to EPA's verbal comments on or about March 25, 1997 (Attachment 3). EPA has completed review of the information submitted by SFC concerning modification of the GMIM workplan schedule.

## II. MODIFICATION

The schedule contained in the report entitled, "Groundwater Monitoring Program, June 1996", (herein incorporated by reference; prepared by TITAN Environmental Corporation, shall replace the original schedule of the approved GMIM workplan and SFC shall implement the GMIM workplan in accordance with the revised schedule. The effective date of this modification shall be the date on which it is filed with the Regional Hearing Clerk.

IT IS SO AGREED AND ORDERED:

Dated: \_\_\_\_\_

By: \_\_\_\_\_

John H. Ellis  
President  
Sequoyah Fuels Corporation

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Samuel Coleman, P.E.  
Director  
Compliance Assurance and  
Enforcement Division  
U.S. Environmental Protection Agency