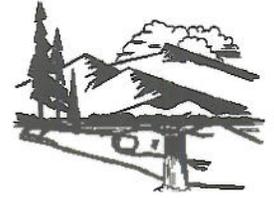




Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

John Corra, Director

February 3, 2012

Ms. Francisca M. Chambus
U.S. Environmental Protection Agency
1595 Wynkoop Street MC: 8P-W-GW
Denver, Colorado 80202-1129

RE: Wyoming Storage Tank Program (STP) **Final LUST TF ARRA Report**
August 2011 through January 2012, Grant #2L-97882201

Dear Ms. Chambus:

The State of Wyoming was awarded an American Recovery and Reinvestment Act (ARRA) Grant on July 6, 2009. This letter provides required semi-annual reporting under that grant. This letter is the Final report for this grant.

Measure 1: Summary of Activities

Two projects were authorized: investigation and remediation of the Kelly Oil/Esquibel sites in Rawlins and investigation and remediation of 27 pre-law tank sites throughout the state. Grant funds not used for these two projects were authorized to pay salaries of STP staff working on cleanup at LUST sites.

Measure 2: Accomplishments/Problems

Kelly Oil/Esquibel Sites: The sites were in active monitored natural attenuation, and quarterly groundwater monitoring was conducted. State closure objectives were met at both sites in December 2011, and both sites were closed. All monitoring wells were abandoned. This project was closed December 31, 2011.

Kelly Oil/Esquibel Sites Problems: No problems encountered.

Pre-Law Tanks Project: After file review it was determined that 21 of the 27 sites required no further action. The remaining 6 sites were referred to the Voluntary Remediation Program because the site owners would not allow the STP access to complete additional investigation. This project was closed September 2010.



Pre-Law Tanks Project Problems: All 27 sites were input to EPA's LUST-4 website. It is unclear as to how to remove or otherwise categorize in LUST-4 the sites that were removed from the project. This problem was conveyed to Theresa Martella, EPA, in emails dated January 5, 2010, and February 4, 2010. Ms. Martella responded on January 7, 2010, via email stating that she had not received information from OUST regarding how to count these sites within the LUST-4 database. Ms. Martella instructed the STP to remove the sites from the "cleanups initiated" and "cleanups completed" sections within LUST-4, which was done. All sites, including the 6 sites that have been referred to the Voluntary Remediation Program, remain counted in LUST-4 as "investigation initiated" and "investigation completed."

STP Staff Salaries, Fringe, and Indirect Costs: The portion of the ARRA grant not used for contractors was authorized by EPA to pay salaries, fringe, and indirect costs of STP staff working on LUST cleanups including the Kelly Oil and Esquibel sites. The total hours charged against the grant for personnel and indirect costs was 10,606.91. The hours were spent on 49 on-going projects, comprising 333 sites and 737 releases.

STP Staff Salaries, Fringe and Indirect Costs Problems: The STP does not track hours by site or release; the program tracks by project. This issue was raised with EPA when we discussed using the remaining grant for STP personnel and indirect costs. EPA was notified that entering all releases into LUST-4 would be burdensome on the state as resources are unavailable to complete this level of effort. The program did not enter the releases into LUST-4.

Measure 3: Schedules

Both projects authorized under the grant have been closed. No further work will be completed. The remaining grant not used for ARRA projects was used for STP personnel and indirect costs for staff working on LUST cleanups. The grant has been exhausted, and no further work under the grant will be completed.

Measure 4: Funds

The Wyoming Department of Environmental Quality received \$929,000 in economic stimulus funds for work under the Leaking Underground Storage Tank Trust Fund.

Kelly Oil/Esquibel Sites: Terracon was the consultant for the project. The STP obligated \$254,546.50 to Terracon for subsurface investigation including tank removal, remedial alternative design (small-scale source removal with BOS-200 injection), construction management during remedial alternative completion, groundwater and soil sampling after implementation of the remedial alternative, and monitoring well abandonment. The original obligation was \$354,546.50; however, an amendment was prepared in August 2010 that reduced the obligation by \$100,000.00 due to the amount of work remaining. Terracon has submitted invoices for \$238,709.73. This amount includes Terracon's final invoice of \$3,850.25 for work completed through December 31, 2011. Per EPA, the remaining \$15,836.77 in Terracon's contract was reallocated to STP salaries, fringe, and indirect costs for use by STP staff working on LUST cleanups in January.

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Platinum Environmental Services, LLC, was the construction contractor for the Kelly Oil/Esquibel sites. Platinum performed limited contaminated soil removal, disposal, and surface restoration. The STP obligated, and Platinum has invoiced and was paid, \$50,800.63. Platinum's work is complete, and this contract was closed August 2010.

Pre-Law Tanks Project: Delta Environmental was the consultant for the project. The STP originally obligated \$335,402.50 for ownership review and Phase I ESAs at 27 sites and subsurface investigation at 13 sites. Subsurface investigation was not completed due to lack of site owner participation. The STP de-obligated \$281,104.76 in September 2010 and closed the contract. Delta's work is completed. Delta received \$54,297.74 for work completed under this contract.

STP Salaries: A total of \$585,191.90 was used for STP salaries. This includes work completed at the Kelly Oil and Esquibel sites, cleanup at LUST sites, and ARRA reporting.

Summary: A total of \$343,808.10 or 37% of the grant was used by contractors (Terracon, Platinum, and Delta) completing work for the program. The contractors have submitted final invoices, have been paid, and the contracts have been closed. The remaining portion of the grant was used for STP salaries, fringe, and indirect costs for remediation work at LUST sites. Total expenditure to-date (contractors and salaries) is \$929,000. Total draw against the grant is \$929,000.

Measure 5: Estimates

Both projects authorized under the grant have been completed and closed. The remaining grant was used by the STP for salaries, fringe and indirect costs of staff working on LUST cleanups. No further work will be completed under this grant.

If you have any questions, please do not hesitate to call me.

Sincerely,



Karen L. Halvorsen, P.E.
STP Manager

Cc: Carl Anderson, PhD, SHWD Administrator
Todd Parfitt, WDEQ Deputy Director
Steve Toalson, WDEQ Administration