

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, October 13, 2015 12:54 PM
To: 'Ben J. Arguijo'; Randy Pair
Cc: Patterson, Heather, EMNRD; Camille J. Bryant; sjwalters@basinenv.com; Bobby Blackwood
Subject: RE: Former Maljamar Station (2RP-2504) - Partial Backfill Request

Ben,

Your proposal for backfill in the Scraper Trap area is approved.

Your proposal for liner installation and backfill in the area identified as C-7 is approved, as well as your proposed sample protocol per your 9/29/15 correspondence.

Operations at this site require like approval by BLM.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

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From: Ben J. Arguijo [mailto:bjarguijo@basinenv.com]
Sent: Tuesday, October 13, 2015 11:50 AM
To: Randy Pair; Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; Camille J. Bryant; sjwalters@basinenv.com; Bobby Blackwood
Subject: Re: Former Maljamar Station (2RP-2504) - Partial Backfill Request

All,

Attached please find an updated data table and a laboratory analytical report for the Scraper Trap sub-excavation at Former Maljamar Station. As summarized in my email from 9/29, the sub-excavation was advanced to 16' bgs. Two (2) soil samples (Scraper Trap @ 16' - N. Floor and Scraper Trap @ 16' - S. Floor) were collected from the floor of the excavation and submitted for TPH and BTEX analyses. Laboratory analytical results confirm that TPH and BTEX are below the recommended remediation action levels for the site, with the only detection being a DRO concentration of 67.0 mg/kg in the South Floor sample.

Based on these analytical results and our previous discussions, Basin Environmental and Plains request approval to backfill the Scraper Trap sub-excavation forthwith.

We also request a conference call tomorrow, 10/14, around 1:00 - 2:00 Mountain to discuss the liner installation and backfilling of sub-excavation C-7.

I look forward to hearing back from you.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
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On Tue, Sep 29, 2015 at 3:06 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

All,

As discussed in our respective meetings (NMOCD - 8/27/15; BLM - 9/9/15), additional delineation was conducted in sub-excavation C-7 of the Former Maljamar Station site (2RP-2504) on 8/28/15 to determine the horizontal and vertical extent of chloride contamination. A delineation trench in the south floor of the sub-excavation, which had been advanced to 14' bgs on 7/20/15, was re-entered and advanced in 2' - 3' intervals to a total depth of 34' bgs (i.e., the extent practicable).

Following an initial spike of 3,420 ppm at 17' bgs, field-screens reflected a downward trend in chloride concentrations to 404 ppm at 32' and 364 ppm at 34'. Since these results were just over the 250 ppm delineation requirement and we could not advance the trench further, I contacted the NMOCD Artesia District Office and received permission from an NMOCD representative to cease delineation and backfill the trench.

Based on field-test results, horizontal delineation of chloride concentrations in the north and south walls of the sub-excavation was achieved (the east/west extents had already been determined), and the excavation floor was leveled to a uniform depth of 12' bgs.

A representative selection of soil samples was submitted for laboratory confirmation, and results confirm TPH and BTEX concentrations in the floor and sidewalls of the sub-excavation are below the NMOCD recommended remediation action levels (RRALs) established for the site. Chloride concentrations in the sidewalls of the sub-excavation are also below the NMOCD RRAL.

A delineation trench was also advanced in the Scraper Trap Excavation on 9/9/15 to investigate the vertical extent of TPH contamination in the southern floor. Field-screens and laboratory analytical results indicate delineation of TPH, BTEX, and chloride concentrations has been achieved both vertically and horizontally in all directions. The excavation has been advanced to a uniform depth of 16' bgs.

Based on field-screens and lab results, Plains and Basin Environmental request permission to perform the

activities summarized below. An up-to-date, cumulative soil chemistry data table (Table #1) is attached for reference. For your convenience, I have also attached separate data tables for the pertinent sub-excavations.

1. Install a 25' x 30', 20-mil plastic liner on the south floor of the C-7 sub-excavation, from the area represented by soil sample Sec. C-7 @ 12' - N. Wall to C-7 @ 12' - S. Wall. See attached Figure 4D and Table #8 for reference.
2. Backfill sub-excavations C-1, C-2, C-6, C-7, and Scraper Trap using stockpiled material on-site. Per our conference call on 7/1/15, 10-point composite samples have been collected for every 500 cubic yards of stockpiled soil, and laboratory analytical results indicate TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. The stockpiled material is represented by soil samples Caliche Stockpile #6b through Caliche Stockpile #11 in data table #18, attached. See Figures 4B, 4D & 4H and data tables #2, #3, #7, and #17 for additional information.
3. Use the stockpiled material on-site to construct a ramp in (and, thus, partially backfill) sub-excavations C-8, C-13 & C-14 to facilitate access to as yet unexcavated portions of Section C. Aside from the south walls of sub-excavations C-13 and C-14, which will be addressed during a later phase of the remediation project, laboratory analytical results from confirmation samples collected from the floors and sidewalls of the three sub-excavations indicate TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. See attached data tables #9, #14, and #15.

As previously agreed, from this point forward, samples collected from the floors and sidewalls of sub-excavations will initially be analyzed for both TPH and chloride concentrations. Once laboratory analytical results indicate concentrations of either contaminant are below the appropriate NMOCD RRAL, subsequent soil samples from that sub-excavation will only be analyzed for the other contaminant. In other words, if initial laboratory analyses indicate chloride concentrations in the sub-excavation are not a concern, later samples will only be analyzed for TPH concentrations (and vice-versa). Samples exhibiting both TPH and chloride concentrations less than or equal to NMOCD RRALs will also be analyzed for BTEX concentrations.

If you have any questions, comments, or concerns, please do not hesitate to contact me by telephone or email.

Respectfully,
Ben J. Arguijo

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