

From: [Bratcher, Mike, EMNRD](#)
To: [Boyle, Matthew](#); [Weaver, Crystal, EMNRD](#)
Subject: RE: Spill Assessment Procedure
Date: Monday, April 2, 2018 9:38:11 AM
Attachments: [image001.png](#)

Matthew,

For the past year or so, sequence for remedial efforts has been somewhat of a moving target. OCD, in conjunction with an O&G Industry working group, has been in the process of formulating a spill/remediation rule, that will replace the 1993 Guidelines and the COAs currently issued with each C-141. A draft of that rule is currently scheduled for hearing by OCD in early June of this year. Hopefully having a rule for dealing with remedial issues, will clarify and provide for some consistency across the agency. You have described the sequence required by the COA issuance, and, a valid point based on the 1993 Guidelines.

At this time, basically, OCD would prefer to see a full delineation of a spill site, with a remediation plan based on that delineation. For this particular site, it appears the hydrocarbon element has been defined and the proposal is adequate, with confirmation samples obtained for verification. At SS-2, however, chloride impact has not been vertically defined. Target goal for chloride definition is 600 mg/kg so this area will require additional delineation. You will need to show horizontal delineation has been achieved for chloride in this area as well. To move this project along, you may perform the additional delineation at the time you have equipment mobilized to perform the excavation.

Also, at this time, TX 1005 is not an acceptable test method in New Mexico. Going forward please use Method EPA 8015 Extended Range for TPH samples.

If you have any additional questions, let me know.

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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.

From: Boyle, Matthew <Matthew.Boyle@wsp.com>
Sent: Wednesday, March 28, 2018 11:54 AM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: Spill Assessment Procedure

Crystal and Mike,

I am trying to figure out the order in which you would like to see things happen when dealing with a release. Is the standard protocol to 1- report the release, 2- write a formal proposal to characterize or assess the site (ie. soil sampling and delineation), 3-once approved by NMOCD then perform the characterization, 4-based on those results then propose a work plan for remediation, 5-get approval from NMOCD for remediation, 6-perform the remediation, and then 7-report on the remediation and request closure?

Looking at the 1993 Sampling Guidelines section III B. states that initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A., is this still a valid way to proceed?

Ultimately what I am trying to figure out is how best follow your rules and still get things done as quick as possible for my clients.

Thank you,

Matthew Boyle
Sr. Environmental Scientist



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Please note I have a new email address.

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Leggette, Brashears & Graham is now WSP.