

From: [Yu, Olivia, EMNRD](#)
To: ["Keith Nichols"; Billings, Bradford, EMNRD](#)
Cc: [Ray T. Kirk; Linda E. Cummings; Hollis Millard](#)
Subject: RE: 1RP-4809 SAP
Date: Thursday, September 21, 2017 12:46:00 PM
Attachments: approved_1RP4809_Sampling and Analysis Plan_FINAL.pdf

Mr. Nichols:

NMOCD approves of the proposed delineation plan for 1RP-4809 with the stipulations and clarifications indicated below. Please see the attachment for your records.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Keith Nichols [mailto:keith.nichols@c-ka.com]
Sent: Thursday, September 21, 2017 12:17 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>; Keith Nichols <keith.nichols@c-ka.com>
Subject: RE: 1RP-4809 SAP

Olivia,

Thank you for the fast response. No other clarifications are needed. Please approve the plan for 1RP-4809 and once the analytical is complete we will be in contact to discuss the results. CK should be onsite the week of October 2 to conduct the field delineation sampling.

Keith Nichols
Ecological Program Manager



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, September 21, 2017 12:56 PM
To: Keith Nichols <keith.nichols@c-ka.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>
Subject: RE: 1RP-4809 SAP

Mr. Nichols:

Thank you for your responses to the comments posed regarding the delineation workplan for 1RP-4809 on September 18, 2017. Typically, emails are addressed in the order in which they are received.

Method 5035 may be used for preliminary assessments. Still, methodology of laboratory analyses, verifying that delineation and remediation have been completed, must be those indicated in the directive appended to the reviewed initial C-141.

To reiterate, delineation sample locations and depths are not necessarily the same as confirmation bottom and sidewall/edge samples. Please be advised that the 4 proposed locations for 5 ft. bgs samples must be representative of the release and demonstrate that permissible levels were maintained.

If no other clarifications are requested, NMOCD will approve of the proposed delineation/release characterization plan for 1RP-4809.

Thanks,
Olivia

From: Keith Nichols [<mailto:keith.nichols@c-ka.com>]
Sent: Thursday, September 21, 2017 8:47 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>
Subject: RE: 1RP-4809 SAP

Olivia,

I left you a voice message this morning. I am checking to see if you had the opportunity to review the response to your questions and if the answers were satisfactory?

Keith Nichols
Ecological Program Manager



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From: Keith Nichols
Sent: Tuesday, September 19, 2017 2:51 PM
To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
Cc: Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>
Subject: RE: 1RP-4809 SAP
Importance: High

Olivia,

The answer to your questions are as follows;

1. CK will use prep Method 5035 for volatiles (BTEX & TPH) unless the NMOCD does not require it? Please confirm NMOCD requirement for Method 5035.
2. CK will use Method 8260 for BTEX and Method 8015 for TPH GRO, DRO & MRO.
3. CK will select 3 locations outside of the tank dike (center of the spill footprint) and one location within the tank dike for a 5 foot bottom hole sample; plus the two background samples from Figure 3. Let me know if that is satisfactory – two of those samples will be associated at pooling areas.
4. CK understands and agrees that these sample locations and the sampling event is for delineation purposes. However, if all samples results are within acceptable ranges, one would consider the results an indication of a successful containment and recovery effort.
5. CK intends to delineate the spill spread area using analytical sample collection in conjunction with PID and EC field measurements (depicted on Figure 3). However, field adjustments will be made based on PID and EC readings (if either meter detects a concern) immediately at the spill boundary moving outside of the spill boundary for delineation purposes (I cannot say how far we would move outside of the spill boundary until we start the field effort). CK would sample the two background locations first to obtain a baseline for the PID and EC.

Let me know if this correspondence is satisfactory in approving the SAP or if you would like edits made to the SAP? Also if you would like a phone conversation. CK would like to schedule the field activity the week of October 2nd upon NMOCD approval of the SAP. It is out intentions to meet NMOCD expectations through the SAP implementations. CK welcomes any input and guidance.

Keith Nichols
Ecological Program Manager



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, September 18, 2017 3:11 PM
To: Keith Nichols <keith.nichols@c-ka.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: kclarke@roverpetro.com; Kirk Faries <kfaries@roverpetro.com>; Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>
Subject: RE: 1RP-4809 SAP

Dear Mr. Nichols:

NMOCD appreciates your prompt response to this release. Please address these concerns regarding the release characterization plan for 1RP-4809.

- The document indicates Method 5035 will be use under the section Soil Sample Collection, but not stated again under the Chemical Analysis section. Will this method be used in conjunction with Method 8015, 8260 or 8021? Soil samples must be analyzed using Method 8260 or 8021 for BTEX, Method 8015 extended for TPH (GRO, DRO, and MRO), and Method 300 for chlorides.
- Please be advised that NMOCD requires two depths with laboratory analyses: depth obtained and depth maintained (minimum 5 ft. further in depth) permissible values. In other words, a proportion of the proposed sample locations must have soil samples delineated to 5 ft. bgs. in addition to 0.5 ft. and 2 ft. as written.
- Please note that NMOCD considers the sample locations demarcated in Figure 3 as proposed delineation sampling locations, not confirmation sample locations. The levels of contaminants in soil samples for delineation and their locations are used to guide remediation, while confirmation samples (bottoms/floors and sidewalls/edges) are collected after remedial

activities to verify that the contaminants remaining in the soil substrate are within permissible levels.

- Please clarify whether the EC meter will assess just the release area or will extend outside the footprint, based on readings.

Thanks,
Olivia

From: Keith Nichols [<mailto:keith.nichols@c-ka.com>]
Sent: Friday, September 15, 2017 9:03 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Cc: kclarke@roverpetro.com; Kirk Faries <kfaries@roverpetro.com>; Ray T. Kirk <ray.kirk@c-ka.com>; Linda E. Cummings <linda.cummings@c-ka.com>; Hollis Millard <hollis.millard@c-ka.com>
Subject: 1RP-4809 SAP

Olivia,

Please find attached our draft Sampling and Analysis Plan (SAP) to delineate/characterize the 1RP-4809 spill. The SAP was drafted based on our last discussion. The sampling locations are initial locations that may be adjusted based on field observations and measurements. Currently, the soils samples are set at 3 inches and 24 inches vertical at 13 locations within the spill area and two background sample locations. Once you have had a chance to review, let me know when we can discuss any questions/comments/edits to obtain final approval to proceed from the OCD.

Have a great weekend!

Keith Nichols
Ecological Program Manager



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