

**From:** Jeff.Walker@ghd.com  
**To:** [Yu, Olivia, EMNRD](mailto:Yu.Olivia.EMNRD@state.nm.us); [rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)  
**Cc:** [Gill, D. Clint Jr.](mailto:David.C.Gill@p66.com)  
**Subject:** RE: 1RP-5152 McGowan/Buckeye Assessment Report  
**Date:** Wednesday, August 29, 2018 10:47:35 AM

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Ms. Yu

I appreciate your time in completing an initial review and will be working on correcting some of the items below while waiting for your comments on the full report. I understand your office may be understaffed at the present time, but still invite you to visit the site. Eyes on the ground would speak volumes to what we are up against with regard to structural limitation at the site.

Thanks-Jeff W.

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**From:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Sent:** Tuesday, August 28, 2018 4:36 PM  
**To:** Jeffrey Walker <[Jeff.Walker@ghd.com](mailto:Jeff.Walker@ghd.com)>; [rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)  
**Cc:** Gill, D. Clint Jr. <[David.C.Gill@p66.com](mailto:David.C.Gill@p66.com)>  
**Subject:** RE: 1RP-5152 McGowan/Buckeye Assessment Report

Mr. Walker:

As we had communicated earlier this morning, I have taken a first pass of the submitted report for 1RP-5152. Please keep in mind that this review is NOT complete, only a quick assessment of data as presented in tabular format and on the map. Comments and concerns mentioned below may have already been addressed in the text.

- In general, the release characterization is not completed. Was/will the impacted area be extended laterally West and South of the sump or West of SW6?
- Please be advised that release characterization/delineation must be completed before consideration of deferral of remediation.
- Was all mechanical methods utilized? Was hydro-vac and/or hammertoe equipment employed in attempts to remove the high levels of TPH extended present in SumpW wall samples?
- What is the setback from the high-pressure water injection lines? In other words, what is the lateral distance between SW3 and the HP lines?
- Per regulation, please note that composite confirmation samples must be taken no greater than 200 ft<sup>2</sup>. Any discolored and wet areas must have discrete samples for laboratory analyses. For verification, date and geo-reference photos taken for these discrete sample locations.
- Confirmation bottom and sidewall sample locations must be marked on a scaled map/figure as well. For example, one 200 ft<sup>2</sup> composite sample location = 4 ft. excavation x 50 ft. lateral length. Each change in depth of excavation must be clearly demarcated on a map, in order to account for the 200 ft<sup>2</sup> composite sampling scheme.
- The site assessment report should also include a scaled map with all the groundwater

sources (USGS, NMOSE, etc.) and other site characterization criteria, marked in relation to the release area.

The link for the revised NMAC 19.15.29 again. <http://164.64.110.134/parts/title19/19.015.0029.html>

Please be advised that as of Friday, August 24, 2018, a revised C-141 form has been issued. Please submit the requisite information, regarding the aforementioned release using this version.

<http://www.emnrd.state.nm.us/OCD/forms.html>

No need to resubmit the initial C-141 at the present moment. Ensure that the next report with the above concerns addressed has the pertinent sections C-141 completed, including initial and site assessment portions.

Thanks,  
Olivia

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**From:** [Jeff.Walker@ghd.com](mailto:Jeff.Walker@ghd.com) <[Jeff.Walker@ghd.com](mailto:Jeff.Walker@ghd.com)>

**Sent:** Tuesday, August 21, 2018 7:54 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)

**Cc:** Gill, D. Clint Jr. <[David.C.Gill@p66.com](mailto:David.C.Gill@p66.com)>

**Subject:** 1RP-5152 McGowan/Buckeye Assessment Report

Ms. Yu/Mr. Mann:

Please find attached a Site Assessment Report for the subject site for your review and approval. Please review at you earliest convenience and do not hesitate to call me with any questions regarding the site or this document.

Thank you-Jeff Walker

**Jeff Walker**

**GHD**

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