

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Jeff.Walker@ghd.com"](#); [Ryan Mann \(rmann@slo.state.nm.us\)](#)  
**Cc:** ["Batt, Aly H"](#)  
**Subject:** RE: 1RP-5152 McGowan/Buckeye Assessment Report  
**Date:** Thursday, September 20, 2018 3:33:00 PM

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Also, please remember to including all corresponding agencies in all correspondence and report submittals. NMOCD databases indicate release occurred on State surface and mineral ownerships.

Olivia

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**From:** Yu, Olivia, EMNRD  
**Sent:** Thursday, September 20, 2018 3:25 PM  
**To:** 'Jeff.Walker@ghd.com' <Jeff.Walker@ghd.com>  
**Cc:** Batt, Aly H <Aly.H.Batt@p66.com>  
**Subject:** RE: 1RP-5152 McGowan/Buckeye Assessment Report

Mr. Walker:

Thank you for your patience for the responses below regarding the site assessment report for 1RP-5152.

1. NMOCD will grant a deferral for the un-remediated area between SW3 and the HP water injection lines. Did the release area extend to the other side of the HP water injection lines? If so, then horizontal delineation must be completed by establishment of a sample location.
2. Deferral will be granted for the un-remediated areas represented by SumpW and SumpS wall only if horizontal delineation is completed and all removal methods (mechanical and manual) were employed to the extent practicable.
3. The confirmation sample locations collected on August 10, 2018 are sufficient.
4. If not already completed, sidewall confirmation samples are required for the lateral extension of the excavated area represented by SW6 and if applicable, for SumpW and SumpS walls.
5. In the remediation/closure report, on a scaled map, please demarcate areas for deferral by GPS coordinates; additional confirmation sample locations; and dimensions of the enlarged excavation area.

Thanks,  
Olivia

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**From:** [Jeff.Walker@ghd.com](#) <[Jeff.Walker@ghd.com](#)>  
**Sent:** Friday, September 7, 2018 11:01 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](#)>  
**Cc:** Batt, Aly H <[Aly.H.Batt@p66.com](#)>  
**Subject:** RE: 1RP-5152 McGowan/Buckeye Assessment Report

Ms. Yu,

Thank you again for taking the time to conduct a preliminary review of initial assessment report for

subject site. We understand your review is not complete, but in the interim, would like to address some of the comments and concerns expressed in your 8/28 email. The occurrence of this release, in the transition between old spill guidelines and new regulations and their interpretation, and NMOCD guidance provided in the field vs. apparent strict adherence to new regulation provided below, hopefully provides opportunity to find some middle ground with respect to closure criteria. Your comments/concerns addressed below:

**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? [Yes, further impact assessment south of the sump has already taken place since 8/10 sample collection. Additional removal west of the sump and west of SW6 can also be conducted. Removal in sump area has structural limitations, but will be conducted to the extent possible.](#)
- Please be advised that release characterization/delineation must be completed before consideration of deferral of remediation. [Understood](#)
- 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? [Due to piping/structural limitations and risks, soil removal has been done by hand. Hydrovac usage to remove hydrocarbon-impacted soils is generally against P66 SOP due to experience of vac-truck explosions.](#)
- 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? [3 to 5 feet.](#)
- 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. [On 8/10/18, I conversed with you from the field, describing the release, the assessment \(including field screening results\)/removal/remediation efforts to date, and provided current dimensions of the excavation \(~260' x 30' x 3'\). Based on researched nearest depth to water and corresponding Table 1, 2,500 ppm TPH cleanup level, field screening results and site observations, I expressed that I felt we were ready to collect confirmation samples. You prescribed a sampling plan that included 3 bottom samples and sidewall samples 50 to 75 ft apart, alternating sides down the length of the main excavation.](#)

The sump area was to be treated as its own rectangular box, with sidewall and bottom samples. This plan was carried out and is represented on the Fig. 2 in the report.

- 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. [See response above. Sample locations are represented on the scaled, Figure 2 in assessment report.](#)
- 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. [A supplemental scaled figure is being produced that will show nearest groundwater source and a half-mile radius centered on the site showing "significant watercourses" if any, within that distance, as per new regs.](#)

Again, if a site visit will help answer some of these questions/concerns, we can meet there to discuss. Please, at your earliest convenience, provide agreement or further concerns you may have with these statements or upon your completion of 8/21/18 Assessment Report submittal.

Thanks,  
Jeff

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

**Jeff Walker**  
**GHD**

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