

From: [Yu, Olivia, EMNRD](#)
To: [Lowry, Joel](#); [Hernandez, Christina, EMNRD](#)
Cc: [Chuck Johnston](#); [Crain, Cynthia K.](#); [Conder, Zachary](#)
Subject: RE: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request
Date: Thursday, October 25, 2018 7:11:00 AM
Attachments: image001.png

Good morning Mr. Lowry:

Thank you for the summary of our phone conversation yesterday afternoon regarding 1RP-5195. NMOCD concurs with proposal. Even though the release will not be closed, please inform NMOCD at least 2 business days in advance to witness remedial activities and soil sampling.

Thanks,
Olivia

From: Lowry, Joel <JLowry@trcsolutions.com>
Sent: Wednesday, October 24, 2018 4:26 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: Chuck Johnston <cjohnston@vnrenergy.com>; Crain, Cynthia K. <CKCrain@trcsolutions.com>; Conder, Zachary <ZConder@trcsolutions.com>
Subject: [EXT] RE: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request

Ms. Yu and Ms. Hernandez,

Our per our conversation, Vanguard will begin making preparations to collect additional soil samples from the area characterized by soil sample S @ 4' in an effort to gain vertical delineation of that area and better characterize the affected area requiring remediation at time of abandonment. In addition, the affected area in the northern portion of the tank battery facility will be excavated to approximately one (1) ft. bgs, removing the impacted soil represented by soil samples HA-1 @ 6" and T-1 @ Surface. Upon removing the impacted soil represented by soil samples HA-1 @ 6" and T-1 @ Surface, the excavated area will be broken up into four (4) quadrants (NW, NE, SW and SE). One (1) composite floor sample will be collected from each quadrant and submitted to the laboratory for analysis of TPH concentrations. Upon collecting the requisite soil samples, the excavated area will be backfilled with non-impacted material. Upon backfilling the excavated area, the northern portion of the tank battery facility will be repaired. Upon completion of the proposed activities, a *Remediation Summary and Deferral Request* will be prepared detailing field activities and laboratory analytical results from each of the collected soil samples. The *Remediation Summary and Deferral Request* will include a scaled map depicting impacted soil affected above the NMOCD Closure Criteria remaining In-Situ proposed to be remediated/reclaimed at time of abandonment.

If you have any questions or need any additional information, please feel free to contact myself, Ms. Crain, or Chuck Johnston by phone or email. Thanks.

Respectfully,

Joel Lowry

From: Lowry, Joel
Sent: Wednesday, October 24, 2018 3:49 PM
To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: 'Chuck Johnston' <cjohnston@vnrenergy.com>; Crain, Cynthia K. <CKCrain@trcsolutions.com>
Subject: RE: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request

Ms. Yu,

Yes. It was our intention to defer the remediation of impacted soil affected above the closure criteria in the northern portion of the facility, beneath the burned tanks, until final remediation of the site at time of abandonment or once all of the equipment has been removed. You are correct in that vertical delineation was not achieved in the area characterized by sample point "S". A majority of our vertical delineation efforts were focused on delineating the area inferred to be representative of "Worst Case" (T-1), exceedances discovered during the initial site assessment (HA-1) and in areas where the liner had been compromised. Test trench "S" was advanced to see if soil was affected above regulatory standards south of T-1, but north of the southern tanks in an effort to determine whether remediation of the northern portion could be achieved without having to unexpectedly stop remediation activities to pursue a TOA.

If you have any questions or need any additional information, please feel free to contact myself, Ms. Crain or Mr. Johnston by phone or email. Thanks.

Respectfully,

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, October 24, 2018 1:39 PM
To: Chuck Johnston <cjohnston@vnrenergy.com>
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: RE: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request

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Mr. Johnston:

Could you please reiterate what we discussed over the phone yesterday for 1RP-5195? The report includes a request for a deferral of remedial activities. Will no excavation be conducted to add the impacted soil before emplacement of a liner and tank? Please clarify.

Also, it appears that vertical delineation is not completed for 'S' sample location. At 4 ft. bgs, TPH levels exceed closure standards.

Thanks,
Olivia

From: Chuck Johnston <cjohnston@vnreenergy.com>
Sent: Tuesday, October 23, 2018 3:15 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: [EXT] FW: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request

Chuck Johnston
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From: Crain, Cynthia K. [<mailto:CKCrain@trcsolutions.com>]
Sent: Friday, October 19, 2018 12:56 PM
To: Chuck Johnston <cjohnston@vnreenergy.com>
Cc: Lowry, Joel <JLowry@trcsolutions.com>
Subject: C.S. Caylor SR Estate #3 - Site Assessment Summary and Deferral Request

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Chuck,

We have tried contacting Olivia at NMOCD by phone to discuss the deferral of the remediation at

the C.S. Caylor SR Estate #3 site, and have not had any luck reaching her.

While waiting on her to return the call, we have prepared a Site Assessment Summary and Deferral Request (attached). If you are in agreement with the Request, please sign pages 4 and 5 of the C-141 located at the end of the document.

Upon receipt of your approval and signatures, we will go ahead and submit this Request to the NMOCD (unless you would prefer to do so).

Please let me know if you have any questions.

Thank you,

Cindy Crain, PG, CAPM
Senior Project Manager



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