

From: [Zach Robbins](#)
To: [Yu, Olivia, EMNRD](#)
Cc: "Jacob Mickle"; stan.mickle@rxsoil.solutions; [Billings, Bradford, EMNRD](#)
Subject: RE: Ruth Co. SWD - 1RP-4572-0 - RXSoil
Date: Thursday, October 19, 2017 11:20:03 AM
Attachments: Ruth Co Closure Report Ammendment - 10-19-17.pdf

Ms. Yu,

Here is the amendment you requested for Ruth Co. SWD.

Please reach out if you have any questions regarding this report. I look forward to hearing back.

Best,
Zach

Zach Robbins | Technical and Engineering Analyst | RXSoil, Inc.
201 Main Street, Suite 1360, Fort Worth, Texas 76102
Cell: 210-400-7645
zach.robbs@rxsoil.solutions

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Monday, October 16, 2017 2:43 PM
To: Zach Robbins <zach.robbs@rxsoil.solutions>
Cc: Jacob Mickle <jacob.mickle@rxsoil.solutions>; stan.mickle@rxsoil.solutions; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Ruth Co. SWD - 1RP-4572-0 - RXSoil

Mr. Robbins & Mr. Mickle:

Thank you for the additional information. NMOCD has been explicit from the start of the proposed remedial activities for 1RP-4572 that confirmation samples at specified depths must demonstrate values within permissible levels of ≤ 600 mg/kg for chlorides. Confirmation samples must be from the base and the sidewalls of the excavated areas. According to the laboratory data, confirmation samples were not taken at the depths indicated on the image annotated in inches (pg. 59). Please be advised that any conditions/stipulations that are deemed not obtainable by the Responsible Party must have NMOCD written approval to avoid misunderstanding or misinterpretation at the closure stage.

To facilitate review of the submitted closure report and data, revise and submit these items in one pdf document:

1. One Google Earth image with these annotations:
 - a. Scale and compass
 - b. Area 1, 2, & 3 outlined and labelled.
 - c. Depths of excavation noted in one measurement unit, either inches or feet.
 - d. Locations of the confirmation soil samples with the corresponding Sample ID demarcated.
 - e. Outlines, dimensions, and depths at which liners were placed.

2. A short synopsis elaborating which confirmation samples were not taken and why (e.g., Area 2 and 3).

RE: soil sample conditions

All samples submitted for laboratory analyses must be on ice and at ~ 4°C, especially samples to be tested for TPH and BTEX.

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: Zach Robbins [<mailto:zach.robbs@rxsoil.solutions>]
Sent: Tuesday, October 3, 2017 10:31 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Jacob Mickle <jacob.mickle@rxsoil.solutions>; stan.mickle@rxsoil.solutions; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: FW: Ruth Co. SWD - 1RP-4572-0 - RXSoil

Hi Olivia,

Jacob is out of pocket for a few days but I will do my best to answer your concerns.

I have copied text from your original email and added my response in red.

Please address these concerns regarding the closure report for 1RP-4572.

1. On the scaled map, label which areas are identified as 1, 2, and 3 and demarcate confirmation sample locations.

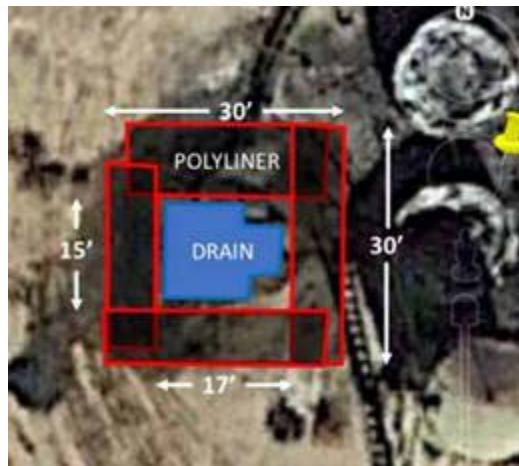
Here is an overview with the areas labeled.



2. Area 1: confirmation bottom samples A2, D1, and C2 exceed NMOCD permissible chlorides levels of 600 mg/kg for remediation. Were soil samples taken from the varying depths of excavation (22", 26", 32", 48")?

The samples are labeled A2', D1', and C2', signifying depths. For example, A2' is at 2' and so on. I believe Jacob had discussions that these results were sufficient to use as bottom samples.

3. Area 2: demarcate the dimensions and extent of the liner. What is the thickness of the liner used?



The liner used is 30 mil.

4. There are missing required confirmation data for Area 2 and 3. Please refer to the email from July 26, 2017.

In between Area 2 and 3 we ran into a large concrete slab. This prevented sampling from the middle section of both areas. Because of this, Area 3 had two bottom samples as requested and one side wall sample on the east side, since we were unable to collect from the west wall (concrete).

5. Please be advised that soil sample conditions taken on July 12 and July 28, 2017 are not optimal. Please remember to follow standard methodology for soil collection.

What conditions are not optimal?

I hope I have sufficiently addressed your concerns. Jacob should be available soon to supplement my answers if you have additional questions.

Thanks,
Zach

Zach Robbins | Technical and Engineering Analyst | RXSoil, Inc.
201 Main Street, Suite 1360, Fort Worth, Texas 76102
Cell: 210-400-7645
zach.robbins@rxsoil.solutions

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, October 2, 2017 2:30 PM
To: Jacob Mickle <jacob.mickle@rxsoil.solutions>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'Stan' <stan.mickle@rxsoil.solutions>
Subject: RE: Ruth Co. SWD - 1RP-4572-0 - RXSoil

Dear Mr. Mickle:

Please address these concerns regarding the closure report for 1RP-4572.

1. On the scaled map, label which areas are identified as 1, 2, and 3 and demarcate confirmation sample locations.
2. Area 1: confirmation bottom samples A2, D1, and C2 exceed NMOCD permissible chlorides levels of 600 mg/kg for remediation. Were soil samples taken from the varying depths of excavation (22", 26", 32", 48")?
3. Area 2: demarcate the dimensions and extent of the liner. What is the thickness of the liner used?
4. There are missing required confirmation data for Area 2 and 3. Please refer to the email from July 26, 2017.
5. Please be advised that soil sample conditions taken on July 12 and July 28, 2017 are not optimal. Please remember to follow standard methodology for soil collection.

Olivia

From: Jacob Mickle [<mailto:jacob.mickle@rxsoil.solutions>]
Sent: Wednesday, August 30, 2017 10:16 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'Stan' <stan.mickle@rxsoil.solutions>
Subject: Ruth Co. SWD - 1RP-4572-0 - RXSoil

Olivia,

RXSoil is pleased to submit the Final Closure Report for the Ruth Co. SWD. Should you have any questions, please feel free to email or call. Thank you for your time.

Jacob Mickle | Remediation Field Specialist | RXSoil, Inc.
201 Main Street, Suite 1360 | Fort Worth, Texas 76102 |
Cell: 210-853-7645
Jacob.mickle@rxsoil.solutions

From: Jacob Mickle
To: [Billings, Bradford, EMNRD](#)
Cc: [Yu, Olivia, EMNRD](#)
Subject: Re: Ruthco Backfill
Date: Wednesday, August 16, 2017 8:21:39 AM

Brad,

Thank you very much. You have a great day.

Jacob Mickle I Remediation Field Specialist I RXSoil, Inc.
201 Main Street, Suite 1360 I Fort Worth, Texas 76102 I
Cell: 210-853-7645
Jacob.mickle@rxsoil.solutions

On Aug 16, 2017, at 8:01 AM, Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us> wrote:

Hello,

Jim asked me to forward on email, yesterday's decision, the approval for RXSoil to commence backfill from the first lot of soils on the RuthCo location in Hobbs.

If there are any questions, please, do not hesitate to contact this office.

Sincerely,

Bradford Billings

From: [Yu, Olivia, EMNRD](#)
To: ["Jacob Mickle"](#)
Cc: [Griswold, Jim, EMNRD](#); [Billings, Bradford, EMNRD](#)
Subject: RE: Ruth Co. SWD - 1RP-4572
Date: Friday, August 11, 2017 3:31:00 PM

Jacob:

Re: 1RP-4572; NMOCD grants approval for the remediated soil in the treatment containments from Round 2 to be placed on polyliner.

Olivia

From: Jacob Mickle [mailto:jacob.mickle@rxsoil.solutions]
Sent: Friday, August 11, 2017 2:49 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Ruth Co. SWD - 1RP-4572

Olivia,

The sampling grid will be provided in the Final Closure Report when the Method 300.0 Chloride sample are completed. For now, the lab attached has charts with depths of method 4500 where discrete samples were taken. The total average of the samples indicate clean. RXSoil wishes to proceed with putting remediated material on polyliner as we wait for Jim's greenlight. Thank you for your time.

Regards,

Jacob Mickle | Remediation Field Specialist | RXSoil, Inc.
201 Main Street, Suite 1360 | Fort Worth, Texas 76102 |
Cell: 210-853-7645
[Jacob.mickle@rxsoil.solutions](mailto:jacob.mickle@rxsoil.solutions)

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, August 11, 2017 1:42 PM
To: Jacob Mickle <jacob.mickle@rxsoil.solutions>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Ruth Co. SWD - 1RP-4572

Jacob:

Where and at what depth was BR2-J taken in treatment containment B? Despite not have a sampling grid, I assume from previous conversations that this discrete sample is from the far end of the treatment containment at either surface, 1 ft. or 2 ft. bgs. Chloride level for this soil sample exceeds permissible 600 mg/kg.

Olivia

From: Jacob Mickle [<mailto:jacob.mickle@rxsoil.solutions>]

Sent: Friday, August 11, 2017 6:39 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Subject: Ruth Co. SWD - 1RP-4572

Olivia,

RXSoil is pleased to share our last set of lab data for Ruth Co. SWD. Pending your approval, we will restore the pad back to it's original state.

Thank you,

July 24, 2017

JACOB MICKLE

RX-SOIL INC.

201 MAIN STREET, SUITE 1360

FORT WORTH, TX 76102

RE: RUTH CO. SWD

Enclosed are the results of analyses for samples received by the laboratory on 07/24/17 9:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 RX-SOIL INC.
 JACOB MICKLE
 201 MAIN STREET, SUITE 1360
 FORT WORTH TX, 76102
 Fax To: NA

 Received: 07/24/2017
 Reported: 07/24/2017
 Project Name: RUTH CO. SWD
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/24/2017
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Cell "A" Round #1 Row "A" State Date

Sample ID: AR1- A -RXNM072417 (H701913-01)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	07/24/2017	ND	416	104	400	3.77	

Sample ID: AR1- B -RXNM072417 (H701913-02)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	07/24/2017	ND	416	104	400	3.77	

Sample ID: AR1- C -RXNM072417 (H701913-03)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	07/24/2017	ND	416	104	400	3.77	

Sample ID: AR1- D -RXNM072417 (H701913-04)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	07/24/2017	ND	416	104	400	3.77	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



Page 4 of 4

(575) 393-2326 FAX (575) 393-2476

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



Form Information

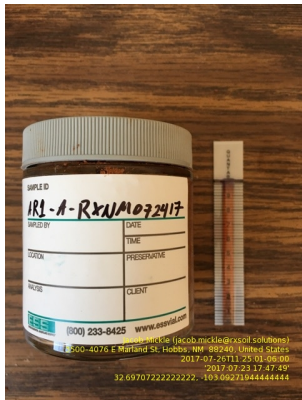
Form Name:	RXSoil Field Test
Submitter Name:	Jacob Mickle (jacob.mickle@rxsoil.solutions)
Submission Date:	Jul 24, 2017 07:25:01 PM MDT
Server Receive Date:	Jul 26, 2017 11:45:09 PM MDT
Reference Number:	20170726-1863785584
Location:	3500-4076 E Marland St, Hobbs, NM 88240, United States
	Jul 24, 2017 07:45:09 PM MDT [View Map]

Project Overview

Client Name	Travelers Insurance
Project Name	Ruth Co. SWD
Type of Form	Field Test
Date/Time	Jul 24, 2017 6:13:03 PM MDT
RXSoil Team Leader	Jacob MICKLE

Sample 1

Type of Field Test	Soil
Method of Testing	Chloride Strips
Name of Sample Point	AR1-A-RXNM072417
Method of Sample Collecting	Bore Hole BH
Depth (inches)	Comp
Picture of Result or Sample Taken	



Lab Name	Cardinal Labs
sample location	3500-4076 E Marland St, Hobbs, NM 88240, United States
	Jul 24, 2017 6:12:33 PM MDT [View Map]
Add test	yes

Sample 2

Type of Field Test	Soil
Method of Testing	Chloride Strips
Name of Sample Point	AR1-B-RXNM072417

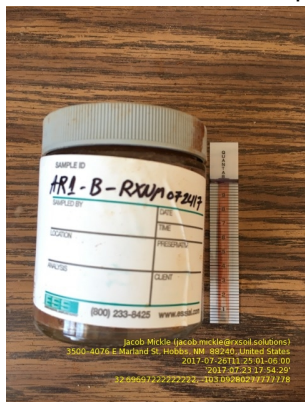
Method of Sample Collecting
Depth (inches)
Comments

Bore Hole BH
Comp
Cell A

1:4 (soil:water)

Chlorides:

Picture of Result or Sample Taken



Lab Name
sample location

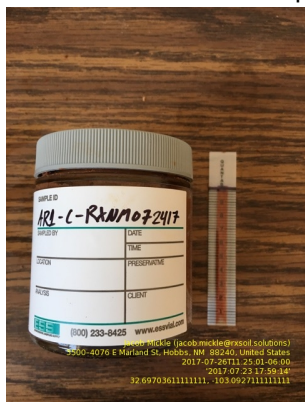
Cardinal Labs
3500—4076 E Marland St, Hobbs, NM 88240, United States
Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]
yes

Add test

Sample 3

Type of Field Test
Method of Testing
Name of Sample Point
Method of Sample Collecting
Depth (inches)
Picture of Result or Sample Taken

Soil
Chloride Strips
AR1-C-RXNM072417
Bore Hole BH
Comp



Lab Name
sample location

Cardinal Labs
3500—4076 E Marland St, Hobbs, NM 88240, United States
Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]
yes

Add test

Sample 4

Type of Field Test
Method of Testing
Name of Sample Point
Method of Sample Collecting
Depth (inches)
Picture of Result or Sample Taken

Soil
Chloride Strips
AR1-D-RXNM072417
Bore Hole BH
Comp



Lab Name
sample location

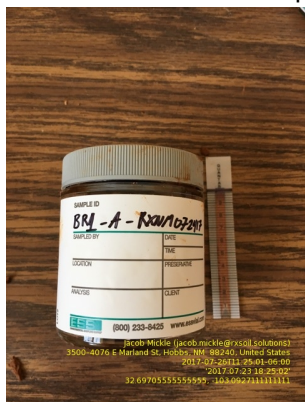
Cardinal Labs
3500—4076 E Marland St, Hobbs, NM 88240, United States
Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]
yes

Add test

Sample 5

Type of Field Test
Method of Testing
Name of Sample Point
Method of Sample Collecting
Depth (inches)
Picture of Result or Sample Taken

Soil
Chloride Strips
BR1-A-RXNM072417
Bore Hole BH
Comp



Lab Name
sample location

Cardinal Labs
3500—4076 E Marland St, Hobbs, NM 88240, United States
Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]
yes

Add test

Sample 6

Type of Field Test

Soil

Method of Testing

Chloride Strips

Name of Sample Point

BR1-B-RXNM072417

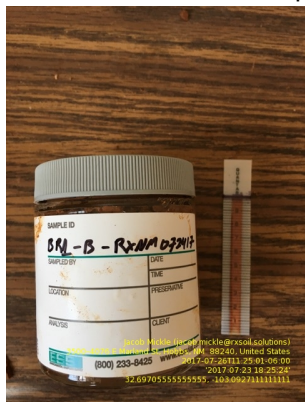
Method of Sample Collecting

Bore Hole BH

Depth (inches)

Comp

Picture of Result or Sample Taken



Lab Name

Cardinal Labs

sample location

3500—4076 E Marland St, Hobbs, NM 88240, United States

Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]

Add test

yes

Sample 7

Type of Field Test

Soil

Method of Testing

Chloride Strips

Name of Sample Point

BR1-C-RXNM072417

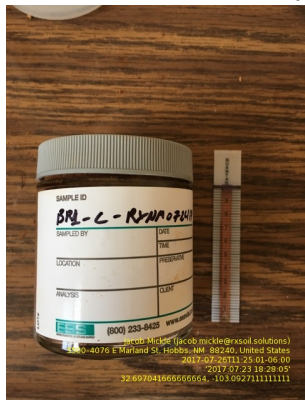
Method of Sample Collecting

Bore Hole BH

Depth (inches)

Comp

Picture of Result or Sample Taken



Lab Name

Cardinal Labs

sample location

3500—4076 E Marland St, Hobbs, NM 88240, United States

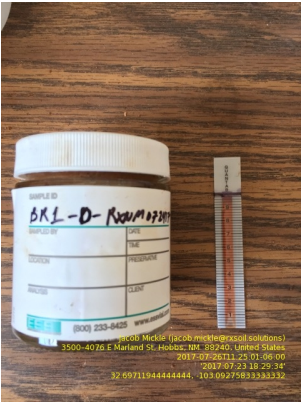
Jul 24, 2017 6:12:33 PM MDT [[View Map](#)]

Add test

yes

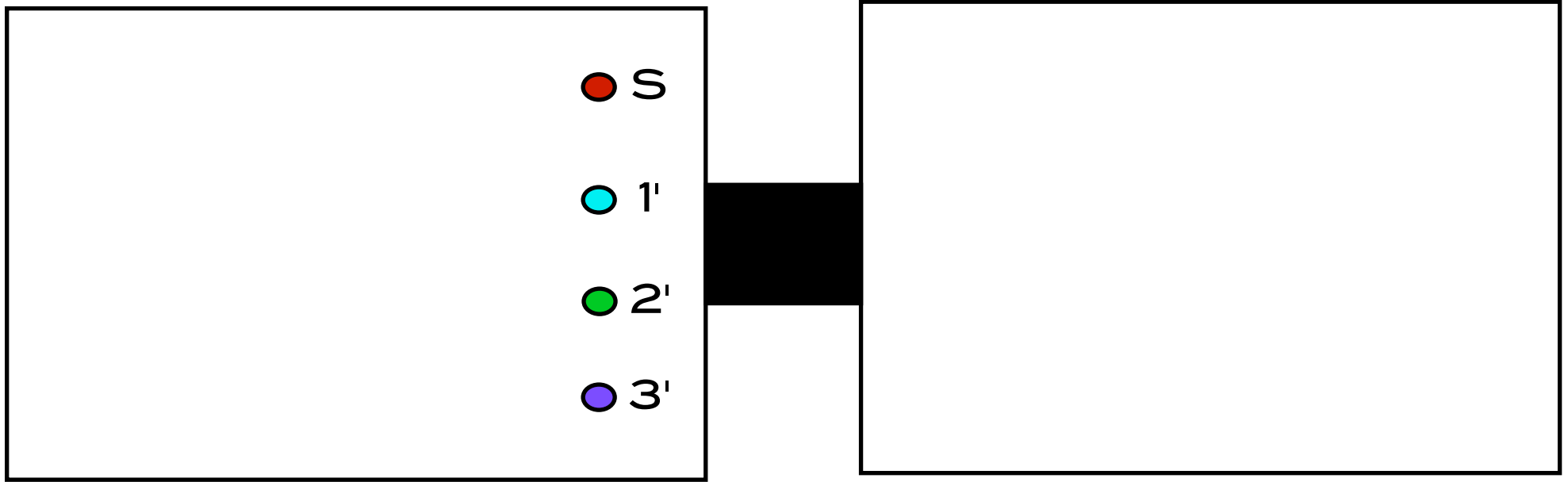
Sample 8

Type of Field Test	Soil
Method of Testing	Chloride Strips
Name of Sample Point	BR1-D-RXNM072417
Method of Sample Collecting	Bore Hole BH
Depth (inches)	Comp
Picture of Result or Sample Taken	



Lab Name	Cardinal Labs
sample location	3500—4076 E Marland St, Hobbs, NM 88240, United States
	Jul 24, 2017 6:12:33 PM MDT [View Map]

SAMPLE POINTS - ROUND 2
TPH & BTEX - "DISCRETE" - EXTENDED



SAMPLE POINTS - ROUND 2
CHLORIDES - "DISCRETE" - 300.0

