

From: [Mann, Ryan](#)
To: ["Aaron Pachlhofer"](#)
Cc: [Yu, Olivia, EMNRD](#)
Subject: 1RP-1301 and 1RP-2197
Date: Thursday, August 16, 2018 4:02:14 PM

Good afternoon Aaron,

Sorry I missed your call earlier. I've been reviewing these this afternoon. There are several issues/questions I have. Given the shallow groundwater, ~47 feet as identified in the report, the site has not been fully delineated to the appropriate RRALs (10ppm benzene, 50 ppm BTEX, and 100ppm TPH). The dirt work conducted for 1RP-1301 is admittedly inadequate and will need more when the site is closed. Was this a plan approved by any agencies? Were any confirmation samples of the excavation taken? Is the site going to be decommissioned soon? Because delineation isn't completed and the remedial work performed was inadequate closure is denied.

Closure for 1RP-2197 is also denied. It appears the last correspondence regarding this release is the NMOCD requiring the site to be delineated due to inconsistencies between the initial c-141 and a field inspection. It seems no work was performed after the request for a site delineation, please inform if this is incorrect? I cannot accept closure of an RP after it was previously denied and no further action was taken.

I haven't been to these sites personally, but it seems deferral would be the best case scenario for 1RP-1301 if the area beneath the tank battery isn't going to be addressed until site closure, but it will need delineation completed. 1RP-2197 is a little murkier, there is no documentation except the email from the NMOCD stating site needs delineation.

Please inform about a potential path forward to move the site toward closure.

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