

AP - 001

2015 WP

11 / 12 / 2015



November 12, 2015

Mr. Glenn Von Gonten  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Subject: Well Point (WP) 14 "Tar" Substance Excavation  
Former Brickland Refinery Site  
Sunland Park, New Mexico  
(Abatement Plan AP-001) – New Mexico Oil Conservation Division Approval Correspondence

Dear Mr. Von Gonten:

Huntsman is providing the New Mexico Oil Conservation Division (NMOCD) with a work plan for the excavation and disposal of "tar" substance at WP-14. The following work plan describes the activities that Huntsman will perform to remove the substance observed during WP-14 excavation activities.

#### **Site Preparation Activities**

Before excavating, a call will be placed to New Mexico 811 "Call before you dig" phone number at least two days prior to excavation activities. Utility representatives will visit the excavation site and mark location of underground electric, telephone, cable, water, sewer and gas lines. The markings are meant to guide the digging to avoid hitting any underground lines. In addition to calling 811, Arcadis will follow their Utility Clearance Standard to also visually inspect the excavation area and note all utilities found in the area and verify they are outside of the excavation limits by a safe distance.

Arcadis has prepared a site-specific Health and Safety Plan for the scope of work as required by the Occupational Health and Safety Administration Standard "Excavation and Trenching" guidelines (29 Code of Federal Regulations [CFR] 1926 Subpart P). The document will be reviewed and signed by Arcadis personnel and subcontractors performing work at the Site.

#### **Excavation Activities**

Arcadis' Construction Environmental Services will be used for excavation services which will include a backhoe operator and backhoe to excavate the soil at the WP-14. A polyethylene film lined roll off dumpster will be provided by Chemical Transportation Inc. (CTI) and will be utilized to stage the contaminated material for proper characterization and disposal. A visual inspection of the "tar" substance will be used to determine the length and depth of the excavation. All soil material removed from the excavation that is not visually categorized as contaminated material will be segregated and placed back into the excavation and then leveled to match the existing ground surface.

Decontamination of the backhoe bucket is planned to ensure no contaminated substance remain on equipment once excavation activities are complete. The process for decontaminating the bucket will be to initially remove large dirt particles and placing those into the roll off dumpster. Once the majority of the dirt is removed the bucket will be washed by brush, alconox, and water. All water will be containerized for future disposal a licensed disposal facility in a 55 gallon drum.

## **Waste Management**

Once all visibly impacted material is excavated and placed into polyethylene film lined roll-off dumpsters, one representative composite sample per dumpster will be collected from the containerized soil and submitted for laboratory analysis for total petroleum hydrocarbons, RCRA 11 TCLP metals (RCRA 8 plus beryllium, nickel, and selenium), total volatile organic compounds, semi-volatile organic compounds, TCLP benzene, and polychlorinated bisphenols. The soil samples collected for chemical analysis will be immediately placed within appropriate laboratory-supplied sample containers, wrapped in plastic bubble wrap to prevent accidental breakage and then placed within sealable plastic bags. The plastic bags will be then placed within a high-strength, ice-filled cooler and will be sealed with custody seals prior to shipment under chain of custody protocol. The cooler will be shipped priority overnight via FedEx to arrive at the ALS Laboratory in Houston, Texas the following morning.

Based on the laboratory analysis of the containerized soil, CTI will develop a waste profile and select an appropriate licensed waste disposal facility. The profile will be signed by Huntsman which will be used to generate a Uniform Waste Manifest to include specific information of shipment and content of the roll off dumpster. Once all documentation is signed and approved, the transportation of the material will be scheduled. Waste will be disposed of following all local, state, and federal regulations at a licensed disposal facility.

## **Reporting**

A letter report will be developed to describe the field activities related to the excavation of the "tar" substance around WP-14. The letter report will include photographic documentation of the excavation activities, a figure depicting the excavation area and estimated volumes removed, laboratory analytical results, and all waste disposition documentation.

If you have any questions or require additional information on our addendum, please contact me at 281-719-3039 or via email at [ed\\_l\\_gunderson@huntsman.com](mailto:ed_l_gunderson@huntsman.com).

Sincerely,



Edward L. Gunderson  
Senior Manager, EHS Legal and Regulatory Compliance