1R - 170

REPORTS

DATE:

2001

January 16, 2001

ECD Environmental Analysis Laboratory
P.O. Box 9328
Albuquerque, New Mexico 87119

Mr. Allen Hodge
Rhino Environmental Services, Inc.
4007 Lovington Hwy.
Hobbs, New Mexico 88240

Dear Mr. Hodge,

Enclosed are the results for the analysis that were requested. Theses were analyzed according to EPA procedures.

Detection limits are determined by EPA methodology. No determination of compounds below these limits are denoted by ND and determination below these limits are denoted by BD.

Please don't hesitate to contact ECD for any additional information or clarifications.

Sincerely,

Greg Bybee
Laboratory Manager

Project: Two States tank

ECO Environmental, Inc.

Client: Rhino Environmental
Project: Two State Tank
Project Manager: Allen Hodge
Project Number:

Date Collected: 1/08/01
Date Received: 1/08/01
Sample Matrix: Soil
Extraction Date: 1/09/01

EPA Method 8015B MOD (Gas/Diesel)

Real ID	Client ID	Dilution	TPH (GRO) (mg/kg)	TPH (DRO) (mg/kg)	Analysis Date
[illegible]	TS-SB-1-15'	2	ND	539	1/09/01
[illegible] 2	TS-SB-1-17'	1	ND	<20	1/09/01
Extraction Blank			ND	ND	1/09/01

QA/QA

Sample ID	Sample Amount	Spike	Recovery	%Recovery
[illegible]	NA	100 ppm	96 ppm	%
[illegible]	300		101 ppm	

Chloride EPA method 300.00

[illegible]	3360 ppm
[illegible]	320 ppm

Hall Environmental Analysis Laboratory
ECD Environmental, Inc.

CHAIN-OF-CUSTODY RECORD

Client: Rhino Env. Services

Address: 4007 Lovington Hwy
Hobbs, NM
88240

Phone #: 392 4099

Fax #: 392 9534

Project Name: Two State tank

Project #: Hobbs Yard

Project Manager: Alan Hodge - Rhino

Sampler: Alan Hodges

Samples Cold?: ☐ Yes ☐ No

Date	Time	Matrix	Sample I.D. No.	Number/Volume	Preservative $HgCl_2$	Preservative HCl	HEAL No.	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gasoline Only)	TPH Method 8015B MOD (Gas/Diesel)	TPH (Method 418.1)	8310 (PNA or PAH)	RCRA 8 Metals	Cations (Na, K, Ca, Mg)	Anions (F, Cl, NO_3, NO_2, PO_4, SO_4)	8081 Pesticides / PCB's (8082)	Air Bubbles or Headspace (Y or N)
		soil	TS SB-1-18				0101090-1			X					X		
		"	TS SB-1-19				-2			X					X		

Date: 1/8 Time: 8am Relinquished By: (Signature) [signature] Received By: (Signature) [signature]

Date: Time: Relinquished By: (Signature) Received By: (Signature)

Remarks:

RHINO
Environmental Services, Inc.
[illegible] • Albuquerque, New Mexico 87125
[illegible] • Fax (505) 797-4874

January 19, 2001

[illegible] State Tank Rental, Inc.
[illegible] Box 1305
NM 88241

MR. C. A. SLATER

RE: WORK PLAN FOR PIT CLOSURE AND SITE REMEDIATION OF THE TWO STATE TANK RENTAL, INC. OLD CLEANOUT PIT LOCATED ON WEST COUNTY ROAD, HOBBS, NM

[illegible] C. Slater

[illegible] Environmental Services, Inc. (Rhino) is pleased to present this work plan [illegible] close the old cleanout pit at the above listed site. The work plan was [illegible] developed to close the old pit in accordance with the New Mexico Oil [illegible] Conservation Division (NMOCD) Unlined Surface Impoundment Closure Guidelines [illegible] our understanding that any potential contamination from the old pit was the [illegible] activities associated with the production of oil and gas.

[illegible] Potential contaminates of concern are expected to be low to mid-level [illegible] concentrations of petroleum hydrocarbons and possibly metals that may have been discharged and/or released and absorbed by the surrounding near-surface [illegible].

[illegible] NMOCD regulates disposal of non-domestic wastes resulting from the oil [illegible] and gas industry. In addition, the NMOCD administers all Water Quality Act [illegible] regulations pertaining to surface and ground water except sewage for the oil and [illegible] gas industry. This authority includes the disposition of non-domestic, non-hazardous wastes at oilfield facilities.

[illegible] Pursuant to the NMOCD Unlined Surface Impoundment Closure Guidelines, the [illegible] clean up level for this site will be at 100 ppm of Total Petroleum Hydrocarbons [illegible] (TPH) due to depth of ground water in the area estimated to be 50' below [illegible].

RHINO ENVIRONMENTAL SERVICES, INC.

Based on dimensions provided by Mr. Slater, there is an estimated total of 000cyds of impacted soils that need to be addressed for complete site closure.

Note: The assessment that was previously done at the site was not conclusive in the fact that the vertical depth was not defined. On January 6, 2001 Rhino brought in a drilling rig to drill one soil boring in the center of the old pit area. The objective of this boring was to define the vertical depth of impact at the site. At [illegible] hard rock layer was encountered, this rock layer appears to be confining, [illegible] only drilled 0.5 mtrs the rock to get a sample. The boring was then [illegible] with bentonite to prevent any pathways for migration. Rhino would propose a clean up level for the site at 1,000 ppm due to the confining rock layer located under the site.

Scope of Work

Notify New Mexico one call @ 1-800-321-2537 and the NMOCD @ 505-393-6161 of intent to start pit closure. Two State Tank Rental Inc. is to notify landowner and any other personnel that may need notification prior to starting project.

[illegible] the equipment and personnel necessary to start project. We will first go over all the safety requirements for this site and set up safety trailer for briefing area. Next, site set up will start first with the work area being cleared and a site fenced to secure the work site from unauthorized entry. Then a staging area for the trucks to load will be set up.

Excavate the old pit and any near-surface soils containing any observed potential contamination. Since the old pit (potential contaminate source) is located in sandy soil with caliche interbedding, impact would have migrated downward. The potential impacted area is expected to be limited to the near-surface soils. Initial excavation operations will consist of removing the impacted soils with TPH above 1,000 ppm to a depth of approximately ten (10) feet. To minimize the volume of waste generated, the site will be excavated with a trackhoe. The estimated waste volume is approximately 1,000 cubic yards based on data from Mr. Slater.

4. Collect a composite sample of the excavated material for laboratory analysis. The purpose of the composite sample is to characterize the excavated material to be OCD exempt or non-exempt. The sample will be analyzed for TPH, volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), eight RCRA metals, and solid waste characteristics (ignitability, corrosivity, reactivity, and toxicity).

RHINO ENVIRONMENTAL SERVICES, INC.

- Should the analytical results from the sample of excavated material record levels of individual compounds that exceed EPA maximum concentration levels (MCL) for toxicity characteristics, a sampling plan to verify the soils remaining in the excavated area are below MCL levels will be developed. This plan will include the collection of a minimum of two (2) soil samples from randomly selected locations within the excavated area. In order to minimize costs, the samples will be analyzed for only compounds that exceeded MCL levels.

- Should the analytical results record individual compound concentrations below EPA listed MCL, the tested materials will be considered a non-exempt non-hazardous waste generated at an oilfield facility. The materials will be transported to a NMOCD permitted commercial waste disposal facility. Each load of material will be accompanied by a manifest in accordance with Section 711 of the New Mexico Solid Waste Management Regulations.

- Collect four (4) soil samples of the excavated area for Total Petroleum Hydrocarbons (TPH) analysis to verify that the remaining surface soils at the site are below NMOCD cleanup guidelines for TPH levels for pit closure. Should the TPH concentrations in the remaining soils exceed NMOCD levels, an additional 6-inch layer of soil will be removed and the bottom of the excavation retested for TPH.

- As per Wayne Price with the NMOCD, to leave the site at a higher level, we will need to demonstrate that the ground water at the site will be protected from future impact. This will be achieved by placing two foot of red bed clay on top of the confining rock layer at the site. Once all the closure criteria has been met for the NMOCD, the site or old pit will then be backfilled and compacted with clean material and dressed off with a slight crown to prevent ponding of water from rains.

- A summary of the cleanup operation will then be prepared by Rhino to include the following: job summary, on-site TPH analysis, lab analysis, site maps and job photos.

The following costs assume that the waste is non-hazardous and has an estimated total volume of 1,000 cubic yards of material or impacted soils. Any services performed outside the scope of work will be billed at listed rates less any agreed discounts.

We estimate the scope of work will take approximately five (5) working days to complete the excavation, transportation and disposal, based on hauling 5 loads per day. We estimate that it will take an additional three (3) working days to complete the backfilling and final site closure.

RHINO ENVIRONMENTAL SERVICES, INC.

Rhino Environmental Services, Inc. appreciates this opportunity to provide you with our professional services. Please feel free to call us at any time for further information or questions you may have with regards to our work plan.

Respectfully,

[redacted] Hodge, RPM
Project Manager
Rhino Environmental Services, Inc.

cc: Steve Chambers
Mr. Wayne Price w/NMOCD