AP - 001

STAGE 1 & 2 WORKPLANS

DATE:

Dec. 26, 1996

DANIEL B. STEPHENS & ASSOCIATES, INC.
ENVIRONMENTAL SCIENTISTS AND ENGINEERS

December 26, 1996

Bill Olsen
Hydrogeologist
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Work Plan for Environmental Services, Brickland Site, Sunland Park, New Mexico

Dear Mr. Olsen,

Daniel B. Stephens & Associates, Inc. is pleased to provide this work plan to the New Mexico Oil Conservation Division (NMOCD) for environmental services to be performed at the Brickland facility in Sunland Park, New Mexico. This work plan is based on your conversation with Reggie Baker with Rexene Corporation on November 21, 1996 and incorporates details regarding the removal of a flow through process tank discovered at the facility.

SCOPE OF WORK

Flow Through Process Tank

A flow through process tank is located in the central portion of the property. Although the actual size of the tank is unknown, it has been estimated to have a volume of 6,000 gallons. The tank is approximately half full of water, oil, and debris.

The liquid in the tank was sampled on December 13, 1996 and analyzed for TCLP Volatiles by EPA Method 8260, TCLP Semi-Volatiles by EPA Method 8270, reactivity, corrosivity, and ignitability by EPA Method 1010, and TCLP Metals by EPA Method 6010 in order to determine waste characterization for proper disposal. Based on the analytical results, the waste is non-hazardous and the tank will be removed according to NMOCD requirements (see attachment 1 for analytical results). The tank will be purged of all liquids and debris, which will be transported to an approved disposal facility.

Following removal of the tank contents, the sidewalls and top of the tank will be excavated. The tank will be removed from the ground, taking care not to rupture the tank or spill any unpurged liquid. The tank will be inspected for any cracks, holes, or leaks and will be

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DANIEL B. STEPHENS & ASSOCIATES, INC.
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appropriately marked and transported to a disposal facility. A soil sample will be collected from each of the sidewalls of the excavation and a composite soil sample will be collected from the bottom of the tank excavation for a total of five soil samples. These samples will be analyzed for total recoverable petroleum hydrocarbons by EPA method 418.1.

Once the flow through process tank has been removed and the soil samples have been collected, the tankhold will be backfilled with the excavated soil as well as imported, clean fill material. Since the area is restricted and does not have regular traffic, the backfill with be compacted by wheel rolling.

Concrete Pit

A three-foot wide by thirty-foot long by six-foot deep service pit is located in the west central portion of the property and is constructed of concrete. The pit is clean and contains no debris. Clean top soil removed from an approved location at the site will be used to fill in the pit and the backfill will be wheel rolled to the existing grade.

Start Time And Duration

DBS&A is prepared to start work upon the approval of this work plan by the NMOCD. It is our understanding that the review of this work plan by the NMOCD will be expeditious in order to facilitate completing this project before the end of December. Start-up can occur within 24 hours of approval by the NMOCD. The estimated time-frame for completing the project is within 7 days from the start-up date.

If you have any questions regarding this work plan or require any additional information, please call me at 915-520-6615.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

P. Damian Reed

P. Damian Reed
West Texas Operations Manager

ATTACHMENT 1

FLOW THROUGH PROCESS TANK ANALYTICAL RESULTS

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
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ANALYTICAL RESULTS FOR
DANIEL B. STEPHENS
Attention: Damian Reed
6701 Aberdeen Avenue, Suite 10
Lubbock, TX 79424

December 20, 1996
Receiving Date: 12/16/96
Sample Type: Water
Project No: LTXREX001
Project Location: Brickland Facility
COC# 101

Extraction Date: 12/16/96
Analysis Date: 12/17/96
Sampling Date: 12/14/96
Sample Condition: I & C
Sample Received by: ML
Project Name: Brickland Site

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T64547 0 - Tank	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	82	11	18	103
1,4-Dichlorobenzene	7.5	0.05	ND	87	3	29	109
o-Cresol	200.0	0.05	ND	77	1	32	96
m,p-Cresol	200.0	0.05	ND	83	0	29	104
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	43	108
Nitrobenzene	2.0	0.05	ND	86	0	38	108
Hexachlorobutadiene	0.5	0.05	ND	85	2	34	106
2,4,6-Trichlorophenol	2.0	0.05	ND	83	4	37	104
2,4,5-Trichlorophenol	400.0	0.05	ND	85	3	40	106
2,4-Dinitrotoluene	0.13	0.05	ND	81	1	53	101
2,4-D	10.0	0.05	ND	88	2	60	110
Hexachlorobenzene	0.13	0.05	ND	88	1	85	110
2,4,5-TP	1.0	0.05	ND	86	5	69	108
Pentachlorophenol	100.0	0.05	ND	76	3	60	95
Chlordane	0.03	0.001	ND	---	4	94	105
Toxaphene	0.5	0.05	ND	---	3	110	100
Lindane	0.4	0.001	ND	---	4	118	96
Heptachlor	0.008	0.001	ND	---	4	90	98
Heptachlor epoxide	0.008	0.001	ND	---	4	114	108
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	---	2	99	105
Methoxychlor	10.0	0.1	ND	---	10	118	106
Surrogates	**% RECOVERY**						
2-Fluorophenol	44						
Phenol-d6	29						
Nitrobenzene-d5	81						
2-Fluorobiphenyl	84						
2,4,6-Tribromophenol	118						
Terphenyl-d14	134						

Methods: EPA SW 846-1311, 8270, 8080.
CHEMIST: RD/CC/MB
ND - Not Detected

BS

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

12-20-96

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
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FAX 806•794•1298

ANALYTICAL RESULTS FOR
DANIEL B. STEPHENS
Attention: Damian Reed
6701 Aberdeen Avenue, Suite 10
Lubbock, TX 79424

December 18, 1996
Receiving Date: 12/16/96
Sample Type: Water
Project No: LTXREX001
Project Location: Brickland Facility
COC# 101

Extraction Date: 12/17/96
Analysis Date: 12/17/96
Sampling Date: 12/14/96
Sample Condition: I & C
Sample Received by: ML
Project Name: Brickland Site

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit*	T64567 0 - Tank	QC	RPD	%EA	%IA
Vinyl chloride	0.2	0.05	ND	0.101	1	92	101
1,1-Dichloroethene	0.7	0.05	0.06	0.097	2	105	97
Methyl Ethyl Ketone	200.0	0.5	ND	0.084	2	110	84
Chloroform	6.0	0.05	ND	0.093	2	99	93
1,2-Dichloroethane	0.5	0.05	ND	0.089	2	93	89
Benzene	0.5	0.05	0.08	0.092	1	98	92
Carbon Tetrachloride	0.5	0.05	ND	0.093	2	107	93
Trichloroethene	0.5	0.05	ND	0.096	0	100	96
Tetrachloroethene	0.7	0.05	ND	0.094	1	105	94
Chlorobenzene	100.0	0.05	ND	0.093	2	97	93
1,4-Dichlorobenzene	7.5	0.05	ND	0.092	0	93	92

SURROGATES	% Recovery
Dibromofluoromethane	95
Toluene-d8	98
4-Bromofluorobenzene	94

ND = Not Detected

***NOTE: Elevated Reporting Limits due to matrix interference.**

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RP

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

12-18-96
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
DANIEL B. STEPHENS
Attention: Damian Reed
6701 Aberdeen, Suite 10
Lubbock, TX 79424

December 18, 1996
Receiving Date: 12/16/96
Sample Type: Water
Project No: LTXREX001
Project Location: Brickland Facility
COC# 101

Extraction Date: 12/16/96
Analysis Date: 12/18/96
Sampling Date: 12/14/96
Sample Condition: I & C
Sample Received by: ML
Project Name: Brickland Site

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T64567	0 - Tank	<0.10	<0.10	<0.02	<0.05	<0.10	<0.05	0.41	<0.01
QC	Quality Control	4.95	4.82	4.95	4.84	5.24	2.6	4.91	0.0048
Reporting Limit		0.10	0.10	0.02	0.05	0.10	0.05	0.20	0.01
RPD		3	10	3	1	8	3	4	10
% Extraction Accuracy		105	93	106	102	98	95	115	96
% Instrument Accuracy		99	97	99	97	105	104	98	99

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: CB
METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 1.0 mg/L As, Se, Cd, Cr, Pb, Ag, Ba; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 2.5 mg/L Ag; 0.005 mg/L Hg.

BB
Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

12-18-96
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
DANIEL B. STEPHENS
Attention: Damian Reed
6701 Aberdeen, Suite 10
Lubbock, TX 79424

December 18, 1996
Receiving Date: 12/16/96
Sample Type: Water
Project No: LTXREX001
Project Location: Brickland Facility
COC# 101

Prep Date: 12/16/96
Analysis Date: 12/15/96
Sampling Date: 12/14/96
Sample Condition: Intact & Cool
Sample Received by:ML
Project Name: Brickland Site

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY (mm/yr)	pH (s.u.)	FLASHPOINT (^{O} F)
	EPA LIMIT =	---	500	250	>6.5 mm/yr	<2 >12.5	>140 ^{O} F
T64567	O - Tank	Non-reactive	<10	<2.5	Non-corrosive 0.61	8.1	>150
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	--	---	---	---
% Instrument Accuracy		---	---	--	---	100	---

METHODS: EPA SW 846-2.1.3, 2.1.2, 1010.
CHEMIST: JT

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

12-18-96
DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

239

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: DAMIAN REED
Phone #: 806-798-4969
FAX #: 806-798-5542

Company Name & Address: OBS&A

Project #: LTXREX001
Project Name: Brickland Site

Project Location: Brickland Facility
Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME	BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	Turn around # of days	Fax ASAP	Hold
64567	O-TANK	4		X						X		12/14/96	930				X	X	X	X				X	

ANALYSIS REQUEST

SPECIAL HANDLING

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
	12-14-96	10:45			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				12-16-96	11:00

REMARKS

RUSH TURN-AROUND

COC #101
FED EX. # 244268508 2

CT

351AT

Daniel B. Stephens & Associates, Inc.
Environmental Scientists and Engineers
6701 Aberdeen Ave., Suite 10
Lubbock, TX 79424
(806) 798-9969
FAX: (806) 798-5542

Date 12-26-96 Project No. _____

Sent to Bill Olsen Sent from Damian Lee

Total Pages Including Cover Page 9

Fax No. 505-827-8177

Remarks Bill, Please review at your earliest convenience. Reyene would like to pull this tank by the end of this month. Please call if you have any questions

Thanks
Damian Lee
(806) 798-9969