

NM1 - ___10 B___

**Concrete
Impoundment
Closure Plan
Approval**

Jan. 15, 2014

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Wednesday, January 15, 2014 1:37 PM
To: 'Marcella Marquez'
Cc: Powell, Brandon, EMNRD (Brandon.Powell@state.nm.us); Perrin, Charlie, EMNRD
Subject: FW: Concrete Impoundment Closure Plan JFJ
Attachments: Concrete Impoundment Closure Plan JFJ.doc

Importance: High

Marcella,

The attached closure plan for the concrete impoundment satisfies the closure conditions of permit NM1-010-B and the transitional provisions and closure requirements of 19.15.36 NMAC.

Brad

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From: Marcella Marquez [mailto:marcella@industrialecosystems.com]
Sent: Wednesday, January 15, 2014 1:28 PM
To: Jones, Brad A., EMNRD
Subject: Concrete Impoundment Closure Plan JFJ
Importance: High

Brad:

Attached please find the revised Closure Plan for the Concrete Impoundment.

Sorry I missed adding the information about retesting for paint filter....someone has to keep you on your toes (it's actually the other way around).

Thanks,
Marcella

JFJ Landfarm (Permit # NM01-0010B) CONCRETE IMPOUNDMENT CLOSURE PLAN

The JFJ Landfarm operated by Industrial Ecosystems, Inc. is submitting the following Closure Plan to OCD for approval to close and dismantle the concrete impoundment (bottoms/sludge/mud receiving area) located on the facility. Dismantling of the concrete impoundment will not occur until approval has been obtained from OCD. This plan will also serve as notice pursuant to 19.15.36.18.A NMAC with the proposed schedule specified in the following plan.

Closure of the concrete impoundment includes removal of the concrete slab/walls, liner beneath the slab, and any soils below the liner which have been impacted.

Any residual waste inside of the concrete impoundment will be removed and placed into a biopile (estimated ½ day) for remediation upon meeting the waste acceptance protocols for paint filter and chloride concentration testing. Waste not meeting the paint filter test will be solidified and retested for chlorides and paint filter prior to being placed into a biopile. Waste not meeting chloride concentration standards will be transported off-site, with proper manifest C-138 form, to a division-approved SWMF or approval to dispose of at San Juan County landfill will be obtained pursuant to Part 19.15.35.8 NMAC.

In accordance with 19.15.35.8 NMAC, the concrete slab/walls will be tested for NORM (estimated ½ day). If the results indicate no NORM, then a sample scraping (surface of the slab) will be tested (estimated 1 day to perform testing and 7-10 days to receive the analytical results back from the lab) for:

- GRO/DRO (EPA 8015) /or TPH (EPA 418.1)-1000 mg/kg;
- RCRA 8 Metals-TCLP (Method 1311/or other approved by OCD)-TCLP Regulatory Limits;
- Benzene (EPA 8021B or 8260B)-less than or equal to 10 mg/kg;
- BTEX (EPA 8021B or 8260B)-less than or equal to 500 mg/kg;

In accordance with 19.15.35.8 NMAC, the results of the NORM testing and the analytical report for the concrete sample scraping will be submitted to OCD along with a request for approval to dispose of the concrete at San Juan County landfill. The concrete slab/walls will not be dismantled/demolished/removed until authorization has been obtained from OCD.

Once the concrete slab and walls have been removed, the liner beneath the concrete will be exposed, cut into manageable pieces, scraped clean with putty knife and/or steam cleaned prior to disposal to the San Juan County landfill (estimated 2 days). The liner will be steam cleaned over a 12' metal stock tank which will be set in a lined and earthen bermed area. The collected rinsate will be solidified to comply with the paint filter testing and tested for chloride concentration standards prior to being placed into a biopile for remediation. Any solidified waste not meeting chloride concentration standards will be transported off-site, with proper manifest C-138 form, to a division-approved SWMF or approval to dispose of at the San Juan County landfill will be obtained pursuant to 19.15.35.8 NMAC. Once the metal stock tank is no longer needed it will be removed from the lined and earthen bermed area, the liner will be removed and the earthen berms will be removed or spread in place.

Once the liner is removed, any visually evident contaminated soils will be removed (estimated 3 days), with the depth of the excavation controlled by field screening for TPH using a PetroFlag Unit until contaminated soils are removed to a screening level below 50 ppm. The excavated soils will be placed into a biopile for remediation, upon meeting the waste acceptance protocols for paint filter and chloride concentration testing. Waste not meeting the paint filter test will be solidified and retested for chlorides & paint filter prior to being placed into a biopile. Waste not meeting chloride concentration standards will be transported off-site, with proper manifest C-138 form, to a division-approved SWMF or landfill. To determine potential migration of contamination, two five point composite samples taken from the exposed surface of the excavation (estimated two days). The samples will be submitted for laboratory testing (estimated 7-10 days to receive the analytical results back from the lab) and characterized according to permit requirements as specified in the JFJ Permit, Page 8, Section 2.b for:

- TPH (EPA 8015M or 418.1) and
- BTEX (EPA 8021B or 8260B)

If analytical results detect TPH and/or BTEX, IEI will comply with the provisions set forth in 19.15.29 NMAC (timeline unknown for 19.15.29 activities).

Any visually evident contaminated soils surrounding the concrete impoundment will be removed (estimated 2 days), with the extent of the excavation controlled by field screening for TPH using a PetroFlag Unit until contaminated soils are removed to a screening level below 50 ppm (see attached drawing from SMA). The excavated soils will be placed into a biopile for remediation, upon meeting the waste acceptance protocols for paint filter and chloride concentration testing. Waste not meeting the paint filter test will be solidified and retested for chlorides and paint filter prior to being placed into a biopile. Waste not meeting chloride concentration standards will be transported off-site, with proper manifest C-138 form, to a division-approved SWMF or landfill. Once the visually evident contaminated soils surrounding the concrete impoundment have been removed, IEI will comply with the provisions set forth in 19.15.29 NMAC (timeline unknown for 19.15.29 activities).

Upon completion of 19.15.29 activities, the area will be backfilled and contoured with "virgin" soils (estimated 2 days).

Re-vegetation of the concrete impoundment and surrounding area will be postponed until the time that final closure of the facility is requested.

Souder Miller and Associates will be contracted to complete all of the above indicated sampling/testing.