

From: [Eads, Cristina, EMNRD](#)
To: [Bynum, Tom \(Contract\)](#)
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Subject: NRM2003154559 TODD 13 BATTERY @ P-17-23S-32E ON OE
Date: Thursday, October 15, 2020 2:03:00 PM
Attachments: [\(C-141 Closure\) NRM2003154559.pdf](#)
[image002.png](#)

NRM2003154559 TODD 13 BATTERY @ P-17-23S-32E ON OE

The OCD has denied the submitted Closure Request C-141 for incident # NRM2003154559 for the following reasons:

- Horizontal delineation has not been completed. Only one confirmation sidewall sample was collected, which appears to be from the northern boundary from the excavation. At a minimum, four separate sidewall composite samples should be collected from each cardinal direction of the excavation to demonstrate horizontal delineation.
- A 48-hour notice was not given to the OCD for the June 17, 2020 sampling event.

Also, could you please clarify why the confirmation base sample, collected in February, was collected from a depth of 0.5' if the total depth of the excavation was 1'?

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal. If you have any questions or believe this denial is in error, please contact me prior to submitting an additional C-141.

Thanks,

Cristina Eads

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OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.