From: <u>Hamlet, Robert, EMNRD</u>
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Subject: Remediation Conditional Approval - Catena Resources - South Vacuum #275 - (Incident #NRM2010059368)

Date: Tuesday, September 22, 2020 3:11:00 PM

Attachments: Remediation Plan - Catena Resources - South Vacuum #275.pdf

Caitlin,

We have received your Workplan/Remediation Proposal for <u>Incident #NRM2010059368</u> South Vacuum #275, thank you. This Workplan/Remediation proposal is approved with the following conditions:

- The OCD will need a signed/dated C-141 Page 5 "Remediation Plan Page" to mark-up and sign. Your Remediation Plan will not be approved on the OCD website until we receive this.
- The OCD would prefer that the soil be excavated and the following procedure be followed if rock refusal is encountered:
 - a. <u>If rock refusal interferes with the remediation process, use a back-hoe/track-hoe to remove the rock</u>
 - b. If the rock is immovable and target depth cannot be reached, use a hydrovac to clean the contaminated soil off of the rock surface and outline specific locations and steps taken on the Closure Report
 - c. <u>Use a rotary drill to drill a 18"-24" hole into the rock, pull sample to ensure contaminants haven't permeated deep through the rock surface</u>
 - d. <u>layer the cleaned rock with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons</u>
 - e. Back-fill with clean material
- All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule. Surface to 4' below ground surface sidewall/floor samples need to comply with the strictest closure criteria limits (600 mg/kg, Chlorides, 100 mg/kg TPH, etc.).
- All (floor/sidewall) closure samples on pad will need to meet closure criteria standards for depth to water of 51'-100' in Table 1 of the Spill Rule.
- Please have soil samples analyzed for all components in Table 1 of the spill rule. The current spill rule may be viewed here: http://164.64.110.134/parts/title19/19.015.0029.html

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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.