

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Wednesday, August 12, 2020 9:32 AM
To: 'Charles Lock'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Remediation Denied - Kaiser Francis - Williams Fee 2524 LBC 1H - (Incident #NRM2010460118)
Attachments: Remediation Denied - Kaiser-Francis - Williams Fee 2524 LBC 1H.pdf

Charles,

We have received your Workplan/Remediation Proposal for **Incident #NRM2010460118 Williams Fee 2524 LBC 1H**, thank you. This Workplan/Remediation proposal is denied.

- The request to inject Micro-Blaze to the depth necessary based on the site plan showing the contaminant levels is denied.
- There are 2 wells in a ½ mile radius that are 10.35' and 13.81' depth to groundwater. The deferral request is denied. The OCD believes deferment will result in imminent risk to human health, the environment, and groundwater. The soil sample locations that are over the closure criteria limits will need to be fully remediated. At that point, a hydrovac/shovel should be used to safely remove the contaminated soil in and around the flare and the flare line.
- Incorporate sidewall samples into your remediation process to help verify horizontal delineation.
- Please upload the new remediation/closure report after the necessary work has been completed.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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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.