

From: [Yu, Olivia, EMNRD](#)
To: [Lowry, Joel](#); [Oberding, Tomas, EMNRD](#)
Cc: [Slade, Rose](#); agroves@slo.state.nm.us
Subject: RE: 1RP-4408 - NMOCD Information Packet
Date: Tuesday, September 5, 2017 9:42:00 AM
Attachments: approved1RP-4408 - NMOCD Information Packet.pdf

Good morning Mr. Lowry:

NMOCD approves of the proposed additional delineation for 1RP-4408 and remedial activities for the BGT. Please see the attachment for your records.

As the release occurred on State surface, like approval from NMSLO required.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

From: Lowry, Joel [mailto:JLowry@trcsolutions.com]
Sent: Tuesday, August 8, 2017 9:31 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Cc: Slade, Rose <Rose.Slade@energytransfer.com>
Subject: 1RP-4408 - NMOCD Information Packet

Ms. Yu,

Please find attached an information packet that has been prepared for the affected area associated with 1RP-4408 at ETC's Jal #3 Gas Plant. As per our conversation, and upon receiving concurrence from Dr. Oberding, ETC anticipates remediating affected soil in the areas characterized by the current open excavations near the Field Scrubber Dumps Tank Below-Grade Tanks (BGTs), under RP-4408 and the attached C-141.

1RP-4408 - Delineation Plan

As per our conversation, delineation trenches will be advanced in the areas characterized by soil samples Exc. A Floor @ 4', Exc. B Floor @ 3', and Exc. C Floor @ 4' an additional 5 feet (ft.) beyond the grade of the current excavations floor in an effort to confirm that soil isn't affected above the NMOCD RRAL at depth. Impacted soil affected above the NMOCD RRAL in the area characterized by soil sample Sec. B South Sidewall will be excavated and an additional round of confirmation soil sampling will be conducted. Upon completion of field activities, a final C-141 will be prepared detailing field activities and laboratory analytical results from confirmation soil samples.

Field Scrubber Dump Tank BGTs

Affected soil directly adjacent to, and beneath, the BGTs will be remediated in accordance with the *Closure Criteria for Soils beneath BGTs, Drying Pads Associated with Closed-Loop Systems and Pits where Contents are Removed* during the removal of the on-site BGTs. Upon removing the BGTs and conducting remediation activities, as necessary, a final C-144 will be prepared detailing field activities and laboratory analytical results from confirmation soil samples. Please reference *ETC's Jal #3 Field Scrubbers – Proposed Closure Strategy*, dated July 26, 2017, for additional details.

If you have any questions or need any additional information, please feel free to contact myself or Rose by phone or email. Thanks!

Respectfully,

Joel Lowry

Senior Project Manager



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