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Dhawan, Neelam, NMENV

From: Dhawan, Neelam, NMENV
Sent: Thursday, January 14, 2010 9:30 AM
To: 'john mc >> "John P. McCann"
Cc: Cobrain, Dave, NMENV; Roberts, Kathryn, NMENV

John

In response to our phone conversation yesterday afternoon regarding your proposed deviations to the approved Investigation Work Plan for S-Site Aggregate Area (IWP).

AOC 16-003(p): You mentioned that you could not collect samples from the center of the sump because water has collected in the sump. I suggested that you pump the water from the sump, containerize it, analyze it, and dispose it of appropriately based on the analytical results. After the water is removed you'd be able to inspect the integrity of the structure. The Permittees proposed, and NMED approved, sampling of the sump. You must complete investigation of the site or provide acceptable justification as to why the work is not completed.

SWMUs 16-004(a), 16-004(b), 16-004(c), 16-004(d), and 16-004(f): All these SWMUs are associated with an old Waste Water Treatment Plant. The reasons you provided to defer the investigation of potential contamination underneath these former structures are that the tanks are filled with water at this time, concrete at the base of the structures is very thick to auger through (up to eight ft, which by the way sounds unreasonably thick), and sampling would be difficult because of confined space issues. These investigations also were proposed in the IWP and approved by NMED. Typically, the standing water in these tanks would be investigated to find out if the structures contain contaminated sludge. The integrity of the tank bottoms would also be inspected to assess whether there is potential for migration of contamination to the subsurface. You must follow the approved IWP or provide justification for not being able to do it in the Investigation Report. Demolition of these structures, if they are no longer in use, obviously would facilitate implementation of the approved work plan.

Thx, Neelam

Neelam Dhawan

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