Monzeglio, Hope, NMENV

ENTERED

From: Scott Crouch [scrouch@jdconsult.com]
Sent: Wednesday, February 13, 2008 10:17 AM
To: Monzeglio, Hope, NMENV; Randy Schmaltz; Hains, Allen
Cc: Cobrain, Dave, NMENV; Frischkorn, Cheryl, NMENV; Chavez, Carl J, EMNRD; Price, Wayne, EMNRD
Subject: RE: Evaluation of Interim Measures
Attachments: passive recovery examples.pdf

Hope:

Please see my responses to each of your questions below:

1) Page 8 of Section 4 states "[t]he samples are identified as Outfall #1, Outfall # 2, Outfall #7, Outfall #8, and Outfall #9, and their locations are shown on Figure 1." These outfalls are again referenced in Appendix D. Are these outfalls identified as Seep 1, Seep 6, Seep 7, Seep 8, and Seep 9 on Figure 1?

Response: You are correct, in that the "outfall" and "seeps" are one in the same. The water samples were labeled as Outfall #1, Outfall #2, etc. on the chain-of-custody forms so I retained this sample ID in the data summary table, which appears in Appendix D. I recalled that in your October 22, 2007 comment letter on the Facility-Wide Groundwater Monitoring Plan, you requested that we discontinue the use of the term "catchments" for these locations and call them "seeps." Therefore, we primarily referred to these locations as seeps in the text and labeled the maps as seeps. Moving forward, we will try to be consistent with the use of "seeps" to identify these locations.

2) Section 6 Recommendations: Bullet 1 states "Measures water levels while recovery wells are in operation to allow an evaluation of the capture zone of the system and again after pumps have been removed and water levels have stabilized" Question: How often will this process be completed and what time of year (when)?

Response: We are proposing to add this step to the existing schedule. Section VIII.B.1 of the Order requires that Giant discontinue all automated and manual extraction of SPH and water from wells for 48 hours prior to measurement of water and product level. We are proposing to complete this activity as required but also check fluid levels in automated wells while the pumps are in operation, just before shutting down for sampling in accordance with the Facility-Wide Groundwater Monitoring Plan.

2) Section 6 Recommendations: Bullet 2 states "Discontinue recovery from the collection wells and recover from only observation wells with LNAPL using passive measures (e.g., absorbent sock)." Question - Specifically, which wells will the absorbent sock be in? Can you send some information on the sorbent sock that will actually be used?

Response: The two observation wells with currently measurable LNAPL are OW 1+50 and OW 3+85. We propose to use passive LNAPL recovery technologies in these two wells and if LNAPL appears in other observation wells, we would add these additional locations to the passive recovery program.

I have attached information on several examples of products that are used for passive recovery of LNAPL. The potentiometric surface has been relatively stable in OW 1+50 and OW 3+85 so it may not be necessary to use socks/bailers that are capable of maintaining recovery efficiencies with fluctuating water levels; however, we will want to utilize the best product for our site-specific application. The volume and viscosity of recoverable material will direct our final choice as to the best passive recovery tool.

2) Section 6 Recommendations: Bullet 2 on page 12: Question: what time of year (months) was Giant planning on sampling the seeps semi annually?

Response: We were planning on doing this during the regularly scheduled semi-annual sampling events in April and October.

Let me know if you have any additional questions.

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From: Monzeglio, Hope, NMENV [mailto:hope.monzeglio@state.nm.us]
Sent: Tuesday, February 12, 2008 5:12 PM
To: Randy Schmaltz; Scott Crouch
Cc: Cobrain, Dave, NMENV; Frischkorn, Cheryl, NMENV; Chavez, Carl J, EMNRD; Price, Wayne, EMNRD
Subject: Evaluation of Interim Measures

Randy and Scott

I have a few questions pertaining to the Evaluation of Interim Measures Report.

1) Page 8 of Section 4 states "[t]he samples are identified as Outfall #1, Outfall # 2, Outfall #7, Outfall #8, and Outfall #9, and their locations are shown on Figure 1." These outfalls are again referenced in Appendix D. Are these outfalls identified as Seep 1, Seep 6, Seep 7, Seep 8, and Seep 9 on Figure 1?

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Thanks

Hope

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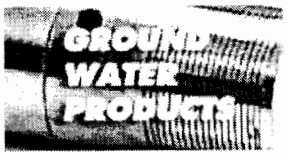
DURHAM GEO SLOPE INDICATOR



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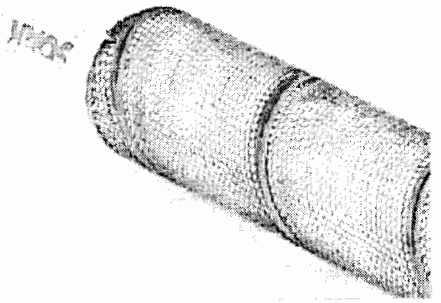
SoakEase™

Absorbent material for immediate response or minimal product.



SoakEase™ absorbent sock inside a stainless steel canister

Catalog page (PDF)

Application:

- Passive LNAPL recovery

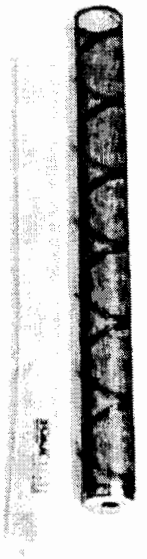
Description

SoakEase is a product-selective absorbent sock inside a stainless steel canister. It is used as a passive collection system for free phase product such as jet fuel, gasoline or diesel fuel from 1.25 in (3.17cm) and larger recovery wells, monitoring wells and recovery trenches.

SoakEase is 36 in (0.9 m) long and is available in three sizes to accommodate specific site requirements:

1 in. absorbs 0.18 quart (0.47 L) of product per sock
2 in. absorbs 1 quart (0.95 L) of product per sock
4 in. absorbs 3 quarts (2.8 L) of product per sock

The SoakEase can be used as a bailer for periodic product removal or as a dedicated system for a more continuous method of recovery. Prior to dedicating the SoakEase, it is recommended that excess free product be removed by bailing with the SoakEase.



SoakEase™ absorbent sock and stainless steel canister

To use SoakEase as a bailer, an absorbent sock is placed in the stainless steel canister, a cord is attached to the support loop and then lowered through the product layer. The full length of the sock should come into contact with the product for greater recovery. Immediately the SoakEase™ will begin absorbing product at a rate of approximately 0.1 gallon (0.38 L) per second, depending on the product viscosity. After some time, the SoakEase should be raised from the well, the sock removed from the canister and disposed of in accordance with regulations.

To use the SoakEase as a dedicated system, it is necessary to determine the amount of product present using an oil/water interface indicator as well as the water table fluctuation. When these have been determined, the SoakEase may be installed to accommodate level changes of up to 36 in (0.9 m).

TB1-100 1" SoakEase Kit

TB2-100 2" SoakEase Kit

TB4-100 4" SoakEase Kit

Individual refills available.

Tech Tip: The product absorption rate is determined by the viscosity of the product and can vary depending on site conditions. The SoakEase is designed to be used with hydrocarbon-based products. The user must determine the necessary replacement schedule by gauging site conditions. The socks can be squeezed out and reused. Approximately 80% of the original absorption can be recovered.

For More Information:

Catalog Page

Related items:

Product/Water Interface Probe
CapCop protection vault

PASSIVE REMEDIATION

Passive Skimmer

Floating inlet automatically adjusts to water table changes.

Application

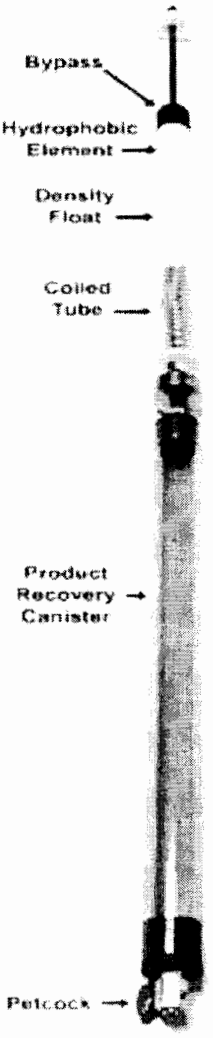
- Passive LNAPL recovery
- Use when minimal product is present or slow recovery rates are expected
- 2 in and larger wells
- May be upgraded to an active system by adding the F.A.P. Plus™ Pump.

Description

- Skimmer
- Canister
- Well Clincher with 30 ft cord

Skimmer. The Passive Skimmer utilizes the F.A.P. Plus™ skimmer to provide a 36 in floating intake for the recovery of free phase products such as gasoline, diesel and jet fuel. It is used when minimal product is present or slow recovery rates are expected. For passive recovery of products with higher than 80 SSU, the 4 in high viscosity skimmer (TR-25410) is used. This system provides a floating intake of 30 inches.

Product Recovery Canister. The clear PVC collection canister uses a quick connect fitting to attach it to the skimmer and provides venting through the skimmer support hollow rod. The bottom of the canister incorporates a petcock for easy draining. The petcock assembly can be removed allowing an extension canister to be threaded into the existing canister to increase the volume of free product that can be recovered. Additional weights are included with each canister and must be used for proper installation.



TR-252

Well Clincher and Cord. The Well Clincher and 30 ft Nylon® suspension cord are used to support the passive skimmer in the recovery well. The clincher incorporates an eye hook to attach the suspension cord. Correct measurement of the product water interface is necessary to properly position the passive skimmer.

Tech Tip. *The critical measurement for proper recovery is from the bottom of the well to the product water interface. Custom canisters are available for shallow well applications.*

SPECIFICATIONS		
	2" Model	4" Model
Length	93.5 in	93.5 in
Outside Dia	1.75 in	3.5 in
Effective Travel	36 in (30 in for High-Viscosity Skimmer)	
Canister Volume	0.13 gal	0.45 gal
Canister Length	24 in	15 in
Min. Water Depth	50.5 in	
Weight	4 lb	6 lb
Extension Canister Length	18 in	16.5 in
Extension Canister Volume	0.10 gal (Additional)	0.52 gal (Additional)
Materials	UHMW polyethylene, stainless steel hollow rod and clamps, urethane tubing, polyethylene hydrophobic filter, Nitrophyl float material, brass fittings, PVC tubing mouldings.	

ORDERING INFORMATION		
TR-252	2 in Passive Skimmer	4 lb
TR-253	2 in Extension Canister	1 lb
TR-254	4 in Passive Skimmer	6 lb
TR-25410	4 in Passive Skimmer (High-Viscosity)	6 lb
TR-255	4 in Extension Canister	2 lb
Parts required to convert a Passive Skimmer into an Active Skimming System:		
TR-516	F.A.P. Plus™ Pump	6 lb
TR-762	2 in Well Clincher	1 lb
TR-764	4 in Well Clincher	2 lb
301822	1/4 in Brass Plug	.25 lb
301139	Push-Lok Fitting	.25 lb

Petro-Bailer™

Low-cost passive skimmer with a fixed product inlet.

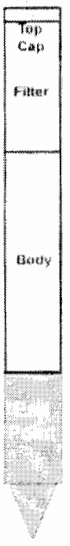
Application

- **Passive LNAPL Recovery.**
- **2 in and larger wells**

Description

The Petro-Bailer™ comprises:

- Top cap with a stainless loop
- Hydrophobic inlet filter element
- Collection reservoir
- Weighted end point



The fixed inlet passive skimmer is made from threaded PVC components and is designed to collect free phase product from 2 in and larger wells. The hydrophobic inlet filter element connects between the body and top cap. The passive skimmer will accommodate water table fluctuations of up to 12 inches. The device will collect water if level fluctuations are greater than 12 in.

SPECIFICATIONS	
Size	61.5 in long x 1.66 in diameter
Volume	0.21 gal
Weight (Net)	3.25 lb
Depth	41.5 in water (minimum for skim)
Materials	PVC body, end point and top. Porous poly-propylene fiber element, 12 in stainless steel suspension loop, Buna-N® "O" Rings

ORDERING INFORMATION		
TR-007	2" Petro-Bailer™ (1.66 x 61.5 in)	4 lb
TR-008	Petro-Bailer™ Weighted End	
TR-009	Petro-Bailer™ Replacement Reservoir	
TR-010	Petro-Bailer™ Replacement Hydrophobic Element	
TR-011	Petro-Bailer™ Replacement Top	

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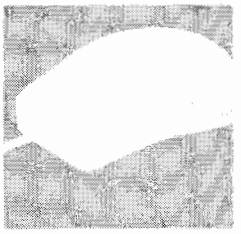

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