

# TCEQ FAX TRANSMITTAL

LPST 11263000 20040223RESP

DATE: 2/23/04

NO. OF PAGES (including this sheet):

7

TO: Name MR TYKE MARTIN / Jim West  
Organization MARTIN MATTHEWS / Meridian Alliance  
Fax Number ~~(713) 794-6898~~ / 713-868-3208

*please forward to the RP*

FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Name Trudy Hasan  
Project Manager, Darcy Environmental Group  
Telephone 512/342-8585 *x 24*  
Fax Number 512/239-2216  
Mail MC-137, PO Box 13087, Austin, Tx 78711-3087

NOTES: Response to Corrective Action Proposal(s) for  
**LPST #: 112630 , Facility ID: 0024029.**  
If you have any problems receiving this fax, please  
call 512/342-8585 .

Releases from underground or aboveground storage tank systems that are reported to the TCEQ on or after September 1, 2003 must comply with the corrective action requirements of 30 TAC 350 (the Texas Risk Reduction Program rule). Information about the rule can be downloaded at [www.tnrcc.state.tx.us/permitting/trrp.htm](http://www.tnrcc.state.tx.us/permitting/trrp.htm).

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 112630  
1/02/2004 Proposal For: PSH REMOVAL

### GENERAL INFORMATION

LPST-ID : 112630 Priority: 2.5  
Responsible Party : MARTIN MATTHEWS Tel: 713/974-6896  
Facility # & Name : 0024029 KEITHS C STORE  
Facility Address : 2210 S MAIN  
Facility City : VIDOR County: ORANGE  
CAPM & Name : CAPM00144 JAMES C. WEST  
RCAS & Name : RCAS00688 MERIDIAN ALLIANCE GROUP, LLC.

### TCEQ TECHNICAL RESPONSE

Proposed activity is approved with the following modifications:

The approved activity is the completion of four 8-hour mobile dual phase extraction (MDPE) events, disposal of wastes, and submittal of a Product Recovery Report.

Three influent vapor samples should be collected at the following times: at the beginning of the event (TPH), midway through the event (TPH/BTEX), and towards the end of the event (TPH). No effluent samples have been approved since previous effluent concentrations met the discharge requirements of the PI-7 Air Permit Exemption, (1.0 lb/hour TPH, 0.009 lb/hour benzene). Aside from three vapor samples, either PID or FID readings should be recorded every 30 minutes during each MDPE event.

We have observed that successful NAPL removal generally occurs when groundwater elevations are low; therefore, MDPE events should not be conducted unless the "smear zone" is exposed under natural conditions. After reviewing historic groundwater elevation data for the site, a decision to mobilize for an MDPE event should be made based on current NAPL thickness and groundwater elevations.

We have pre-approved the disposal of 500 gallons of fluids for each event. If additional waste disposal is necessary based upon site conditions, please contact your coordinator for verbal approval.

Please submit the Product Recovery Report within 90 days of the date of this CARF. The report should include a copy of the PI-7 exemption application and an estimate of the amount of product remaining in the ground.

You are required to notify the appropriate TCEQ field office no later than 10 days prior to conducting the approved activity.

We have reviewed the Product Recovery Report dated 1/6/04 and accept it as

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## LPST CORRECTIVE ACTION RESPONSE FORM

LPST-ID: 112630  
1/02/2004 Proposal For: PSH REMOVAL

### TCEQ TECHNICAL RESPONSE

submitted.

### ACTIVITY COST SUMMARY

Proposed Cost:	17,177.00	Maximum Pre-Approved:	16,175.00
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Signature: Judy Hasan Date: <sup>2/23/04 JH</sup>~~2/24/04~~ Telephone: 512/342-8585

Trudy Hasan

Project Manager, Darcy Environmental Group

Approval:

David Bratberg

David Bratberg

Senior Project Manager, Darcy Environmental Group

Prasanthi Bollineni or Maria Lebron

Prasanthi Bollineni or Maria Lebron

TCEQ On-site Representative

PST Responsible Party Remediation Section

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## LPST CORRECTIVE ACTION RESPONSE FORM

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Pursuant to 30 TAC Section 334.82 (b), you are required to notify all parties affected by the contamination. If you determine that contamination from the release has migrated off-site, or if you are required by the TCEQ to conduct further assessment or other corrective actions off-site, then you are required to notify the affected landowner(s) within 30 days of documenting the impact. Please note that landowners may include state and local owners of right-of-way properties. For the purpose of this requirement, notice shall be through any means described in 30 TAC Section 334.82 (a). Please provide documentation that the affected landowner(s) has/have been notified within 30 days of notification. **Please note that failure to notify affected parties as required herein is grounds for formal enforcement proceedings.**

Please note that preapproval of this activity DOES NOT guarantee reimbursement. Eligibility is determined at the time of reimbursement application review. If the release is eligible, the preapproved amount is the maximum allowable for the proposed activities. The actual amount of reimbursement will be determined after the completed reimbursement application and all related receipts and invoices are submitted, and the completed activity is subject to technical and reimbursable cost review. In all instances, the completed work must be technically justifiable and should serve to advance the site in the corrective action process. The amount of preapproved work performed should be based on completion of the activity's objectives. Additionally, please also note that preapproved amounts include all eligible markup.

Claims for reimbursement should only be submitted after the completion of an annual cycle for remediation system operation and maintenance, and quarterly groundwater monitoring unless a more frequent filing period is previously approved by the PST Reimbursement Section. The Reimbursement Section can be reached at 512/239-2001.

cc: Keith Anderson, TCEQ Region 10 Field Office  
3870 Eastex Freeway, Suite 110, Beaumont, Texas 77703-1892  
Phone: 409/898-3838 Fax: 409/892-2119

# NAPL Remediation - MDPE Preapproval Worksheet

LPST # 112630  
 Facility # 24029  
 Facility Name Keith's C Store  
 Facility Address 2210 S. Main, Vidor (Orange)  
 RPR Project Manager tsh  
 Date 19-Feb-04

No. of Events 4  
 Event Duration 8 hrs

Input

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## A. Personnel

		Total
Report Preparation	=	\$260
Office Personnel	=	\$320
Field Personnel	=	\$4,140
PI-7 Exemption	=	\$0
Subtotal Subcont. Personnel	\$0	
Subcontractor Markup %	10%	= \$0
Cost Proposal Preparation	=	\$115
<b>A. Total Personnel</b>		<b>\$4,835</b>

## B. MDPE Equipment

	Units		\$/Unit	Total
DPE Equipment (Includes Holding Tank)			=	\$6,800
Security Fence	0	x	\$300	= \$0
Bailers	0	x	\$8	= \$0
Subtotal Subcontracted Equipment =			\$6,800	
Subcontractor Markup %			15%	= \$1,020
<b>B. Total Equipment</b>				<b>\$7,820</b>

## E. Waste Management

	Units		\$/Unit	Total
Vacuum Truck	16	x	\$75	= \$1,200
Fluids Disposal	2,000	x	\$0.40	= \$800
Dicharge Permit	0	x	\$0	= \$0
Subtotal Subcontracted Waste Mgmt.			\$2,000	
Subcontractor Markup %			10%	= \$200
<b>E. Total Waste Management</b>				<b>\$2,200</b>

Item	Proposed		Approved		App. - Prop. Difference
	Subcont.	Total	Subcont.	Total	
Personnel	\$0	\$5,155	\$0	\$4,835	-\$320
Equipment	\$6,980	\$8,027	\$6,800	\$7,820	-\$207
Travel	\$0	\$0	\$0	\$0	-\$0
Analytical	\$1,632	\$1,795	\$1,200	\$1,320	-\$475
Waste	\$2,000	\$2,200	\$2,000	\$2,200	\$0
<b>Total</b>	<b>\$10,612</b>	<b>\$17,177</b>	<b>\$10,000</b>	<b>\$16,175</b>	<b>-\$1,002</b>

## C. Travel

	Units		\$/Unit	Total
<b>MDPE Personnel Travel</b>				
72-hr event	0		\$1,100	\$0
7-day event	0		\$1,700	\$0
Note: Travel costs for 8-hr and 24-hr event are part of DPE equipment				
<b>MDPE Event Oversight</b>				
Mileage (> 100 miles rt)	\$0	x	\$0.37	= \$0
Equipment Truck, days	0	x	\$140	= \$0
Travel Time	0	x	\$70	= \$0
Per Diem	0	x	\$80	= \$0
<b>Gauging Visits</b>				
Mileage	\$0	x	\$0	= \$0
Equipment Truck, days	0	x	\$140	= \$0
Travel Time	0	x	\$45	= \$0
Per Diem	0	x	\$80	= \$0
Subtotal Subcontracted Travel			\$0	
Subcontractor Markup %			15%	= \$0
<b>C. Total Travel</b>				<b>\$0</b>

## D. Analytical

	Units		\$/Unit	Total
<b>Influent Samples</b>				
BTEX (a)	4	x	\$63	= \$250
TPH (a)	12	x	\$63	= \$750
<b>Effluent Samples</b>				
BTEX (a)	0	x	\$63	= \$0
TPH (a)	0	x	\$63	= \$0
Tedlar Bags	16	x	\$7.50	= \$120
Shipping	16	x	\$5	= \$80
Subtotal Subcontracted Analytical			\$1,200	
Subcontractor Markup %			10%	= \$120
<b>D. Total Analytical</b>				<b>\$1,320</b>

**Total MDPE Reimbursable Cost (A+B+C+D+E) = \$16,175**

*detailed spreadsheet follows...*

*Note only 12 TPH + 4 BTEX samples approved.*



# NAPL Removal - MDPE Preapproval Worksheet

LPST #  
Facility #  
Facility Name  
Facility Address  
RPR Project Manager

112630  
24029  
Keith's C Store  
2210 S. Main, Vidor (Orange)  
tsh

No. of Events 4  
Event Duration 8 hrs

Date 19-Feb-04

A1: RCAS Personnel	Activity	Hours/Units	Rate	Total
<b>Office Costs</b>				
	All necessary management/regulatory interaction/permit activities			
Project Manager (PM)		0	\$80	\$0
PI-7 Exemption		0	\$195	\$0
Cost Proposal Preparation		1	\$115	\$115
MDPE services conducted by RCAS==> All PM time is included under the MDPE personnel Costs				
<b>Field Costs</b>				
Staff E/G/H				
8-hour event		0	\$80	\$0
24-hr event		0	\$80	\$0
72-hr event		0	\$80	\$0
7-day event		0	\$80	\$0
Technician I for gauging/handbailing		0	\$40	\$0
A2: MDPE Personnel	Activity	Hours/Units	Rate	Total
<b>MDPE Report</b>				
		1	\$260	\$260
<b>Office Costs</b>				
	All necessary management/regulatory interaction activities			
8-hour event	PM 1 hr/event	4	\$80	\$320
24-hr event		0	\$80	\$0
72-hr event		0	\$80	\$0
7-day event		0	\$80	\$0
<b>Field Costs</b>				
	All necessary field activities			
8-hour event	SF @\$70/hr and TII @\$ 45/hr for 9 hours each	4	\$1,035	\$4,140
24-hr event		0	\$2,160	\$0
72-hr event		0	\$1,780	\$0
7-day event		0	\$3,220	\$0
	% subtotal subject to markup	0.00%	SubTotal	\$4,835
	Total amount subcontracted	\$0.00	Markup(10%)	\$0
	<b>Total</b>			<b>\$4,835</b>

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B. MDPE Equipment	Activity	Hours/Units	Rate	Total
<b>DPE Equipment</b>				
	All equipment including holding tank			
8-hour event	Equipment Rental + Fuel + Misc./small items + Mob/Demob	4	\$1,700	\$6,800
24-hr event		0	\$2,400	\$0
72-hr event		0	\$3,500	\$0
7-day event		0	\$9,300	\$0
Security Fence	Only for 72-hr event	0	\$300	\$0
Bailers		0	\$8	\$0
	% subtotal subject to markup	100.00%	SubTotal	\$6,800
	Total amount subcontracted	\$6,800	Markup(15%)	\$1,020
	<b>Total</b>			<b>\$7,820</b>

C. Travel	Activity	Hours/Units	Rate	Total
<b>MDPE Personnel Travel</b>				
	Travel cost included in MDPE equipment			
8-hour event		0	\$0	\$0
24-hr event		0	\$0	\$0
72-hr event		0	\$1,100	\$0
7-day event		0	\$1,700	\$0
<b>RCAS/CAPM Travel (Event oversight)</b>				
		Hours/Units	Rate	Total
Mileage		0	\$0.37	\$0
Equipment Truck, days		0	\$140	\$0
Travel Time		0	\$70	\$0
Per Diem		0	\$80	\$0
<b>RCAS/CAPM Travel (Gauging visits)</b>				
Mileage		0	\$0.37	\$0
Equipment Truck, days		0	\$140	\$0
Travel Time		0	\$45	\$0
Per Diem		0	\$80	\$0
	% subtotal subject to markup	0.00%	SubTotal	\$0
	Total amount subcontracted	\$0	Markup(15%)	\$0
	<b>Total</b>			<b>\$0</b>

# NAPL Removal - MDPE Preapproval Worksheet

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Facility Name  
Facility Address  
RPR Project Manager

112630  
24029  
Keith's C Store  
2210 S. Main, Vidor (Orange)  
tsh

No. of Events 4  
Event Duration 8 hrs

Date 19-Feb-04

D. Analytical	Activity	Hours/Units	Rate	Total
<u>Influent Vapor Samples</u>				
BTEX (a)	Collect one sample at halfway point in the event	4	\$63	\$250
TPH (a)	1st sample at start, 2nd sample at halfway point, 3rd sample at end	12	\$63	\$750
<u>Effluent Vapor Samples</u>				
BTEX (a)	Collect within the 1st hour of starting the event - 1st event only***	0	\$63	\$0
TPH (a)	Collect within the 1st hour of starting the event - 1st event only***	0	\$63	\$0
Tedlar Bags		16	\$7.50	\$120
Shipping		16	\$5	\$80
***If effluent concs. do not meet 30 TAC 106.533(2) and 106.262(3) standards, additional effluent testing during subsequent events may be necessary				
	% subtotal subject to markup	100.00%	SubTotal	\$1,200
	Total amount subcontracted	\$1,200	Markup(10%)	\$120
		<b>Total</b>		<b>\$1,320</b>

E. Waste Management	Activity	Hours/Units	Rate	Total
Vacuum Truck	4 hrs/event	16	\$75	\$1,200
Fluids Disposal	500 gallons/8-hr event	2000	\$0.40	\$800
Other (Discharge Permit Costs)	As needed	0	\$0	\$0
	% subtotal subject to markup	100.00%	SubTotal	\$2,000
	Total amount subcontracted	\$2,000	Markup(10%)	\$200
		<b>Total</b>		<b>\$2,200</b>

Input

Go to Condense

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Item	Proposed		Approved		App. - Prop. Difference
	Subcont.	Total	Subcont.	Total	
Personnel	\$0	\$5,155	\$0	\$4,835	-\$320
Equipment	\$6,980	\$8,027	\$6,800	\$7,820	-\$207
Travel	\$0	\$0	\$0	\$0	-\$0
Laboratory	\$1,632	\$1,795	\$1,200	\$1,320	-\$475
Waste	\$2,000	\$2,200	\$2,000	\$2,200	\$0
<b>Total</b>	<b>\$10,612</b>	<b>\$17,177</b>	<b>\$10,000</b>	<b>\$16,175</b>	<b>-\$1,002</b>

Feb 23 2004 9:00am

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**Last Transaction**

<u>Date</u>	<u>Time</u>	<u>Type</u>	<u>Identification</u>	<u>Duration</u>	<u>Pages</u>	<u>Result</u>
Feb 23	8:58am	Fax Sent	14098922119	2:06	7	OK

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Feb 23 2004 8:57am

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**Last Transaction**

<u>Date</u>	<u>Time</u>	<u>Type</u>	<u>Identification</u>	<u>Duration</u>	<u>Pages</u>	<u>Result</u>
Feb 23	8:54am	Fax Sent	17138683208	2:21	7	OK

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