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September 5, 2023

Madeline Dillner
Project Coordinator
Oil and Gas Conservation Division
Oklahoma Corporation Commission
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Oklahoma City, OK 73105
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Re: **Brownfield Cleanup Proposal**
Producers Coop
6 SE 4th St, Oklahoma City, Oklahoma

Oklahoma Environmental Services (OES) is pleased to submit this proposal for community review and comment for planning and execution of the scope of work to be completed to achieve appropriate brownfield closure. OES proposes conducting an excavation event around SB-6 at the above-referenced property (Site) in Oklahoma City, OK.

Project Information

OES has conducted a Phase I ESA, a Phase II ESA, and two Additional Site Characterizations (ASC) of the Site, with the most previous ASC dated August 4th, 2021, which delineated various quadrants of the Site. Based on the findings from the Phase II ESA completed on February 29, 2016, SB-6 at 9' below ground surface (bgs) exhibited elevated concentrations of total petroleum hydrocarbons (TPH). Boring logs from SB-6 indicate greatest impact from 7-9 feet bgs. OES recommends excavation of approximately two (2) feet of impacted soil (7-9' bgs) from a 10' x 10' x 10' area in the vicinity of SB-6.

Potential chemicals of Concern (COC's):

- Volatile Organic Compounds (VOCs)
- Total Petroleum Hydrocarbons (TPH)

Site Description and History

The Site consists of an approximately 36.09-acre parcel of currently vacant land. The Site is located at 6 SE 4th St, Oklahoma City, OK 73129, and encompasses a portion of Section 04, Township 11N, Range 3W, IM in Oklahoma County. Based on review of the available historical information, the Site property boundaries were previously developed with a private railroad track running through the northeastern portion of the Site. The private railroad was utilized by the larger development the Site was originally a part of. The larger development the Site was originally a part of was first constructed as part of a cottonseed oil mill in 1898 with smaller portions of the larger

development formerly being used as a stockyard, meat packing company, slaughterhouse, machine shop and an oil company before the cottonseed mill expanded to the south. Adjoining properties to the North and West are predominantly commercial.

Proposed Scope of Work

OES is proposing the excavation of impacted soil in and around the former SB-6 location identified in the Phase II Environmental Site Assessment completed in January 2016. SB-6 at that time was analyzed to contain 12,300 mg/kg TPH in soil at 9 ft below ground surface (bgs). To achieve remedial closure, a 10 ft x 10 ft x 10 ft area (approximately 37-cubic yards) would be excavated around SB-6 to uncover the entirety of the impacted zone. OES estimates approximately 10-cubic yards of TPH impacted soil is present within the Soil Management Zone (SMZ).

At least 48 hours prior to the initiation of field activities, a request will be made to OKIE One-call for the marking of subsurface utilities. A site-specific Health and Safety Plan will also be prepared, to be adhered to by all onsite field personnel involved in the field activities.

The excavated soil will be field-screened at 1-foot intervals using a Mini-Rae Photo Ionization Detector (PID), calibrated to isobutylene, to indicate the presence of organic vapors. Clean soil will be stockpiled inside the SMZ to be returned to the excavation pit following removal of all impacted soil. Impacted soil will be loaded into dump trucks and immediately sent to the OKC Landfill for disposal. The following guidelines will be implemented for all soil excavation within the SMZ:

- Notify all persons working in field to minimize contact with soil using proper Personal Protection Equipment (protective clothing such as long pants, long sleeves, and gloves.)
- Minimize dust by wetting soils.
- Stockpile any removed soil on top of anchored plastic sheeting. Cover soil at the conclusion of work activities or in the event of rain.
- Soil stockpile areas must be secured to prevent access to all persons except those completing the subject work via temporary fencing if left unattended.
- Impacted soils that will not be reused in the SMZ should be disposed of in accordance with federal, state, and local law, as soon as practicable.

One (1) soil sample will be collected from each sidewall, and one (1) soil sample will be collected at depth for a total of five (5) soil samples. Samples will be analyzed for BTEX and TX1005 (TPH). Obtained soil and groundwater samples will be placed in laboratory prepared containers, properly preserved, placed on ice in a cooler, and delivered under chain-of-custody control to Environmental Testing Laboratory (ETI) analytical laboratory in Oklahoma City, Oklahoma. ETI is an Oklahoma Department of Environmental Quality (ODEQ)-certified laboratory.

Based upon the identified historic use of the Site, all obtained soil samples will be analyzed for concentrations of VOCs and TPH. Note that groundwater sampling, and disposal of groundwater, are not included in this proposal.

Proposal for Limited Subsurface Investigation
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Oklahoma City, OK

Upon completion of excavation activities, clean fill equivalent to the amount of disposed soil will be stockpiled onsite, placed into the excavation area, and graded to the original ground level. This proposal does not include post-grading ground cover.

Report Preparation

One pdf-formatted copy of the final report will be submitted that presents the results of this assessment, based upon the scope of services and limitations described herein.

Schedule

The proposed services will be initiated upon receipt of a signed Professional Services Agreement. The final report will be submitted to the client *within 14 days of receipt of the laboratory analytical report*.

Reliance

The report will be prepared for the exclusive use and reliance of the client. Reliance by any other party is prohibited within written authorization of the client and OES.

Scope and Report Limitations

The findings and conclusions presented in the final report will be based on the site's current utilizations and the information collected as discussed in this proposal. Please note that OES does not warrant database or third-party information (such as from interviewees) or regulatory agency information used in the compilation of reports. OES's services will be performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time period. OES makes no warranties, either express or implied, regarding the findings, conclusions, or recommendations. Please note that OES does not warrant the work of laboratories, regulatory agencies or other third parties supplying information used in the preparation of the report.

Findings, conclusions, and recommendations resulting from these services will be based upon information derived from the on-site activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents maybe latent, inaccessible, unobservable, non-detectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this investigation. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations, or exploratory services; the data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

Davis Bacon Contract Requirements

Davis Bacon prevailing wage requirements for Heavy Construction in Oklahoma City, Oklahoma County apply to this project. The attached Davis-Bacon Poster will be prominently displayed at the project site.

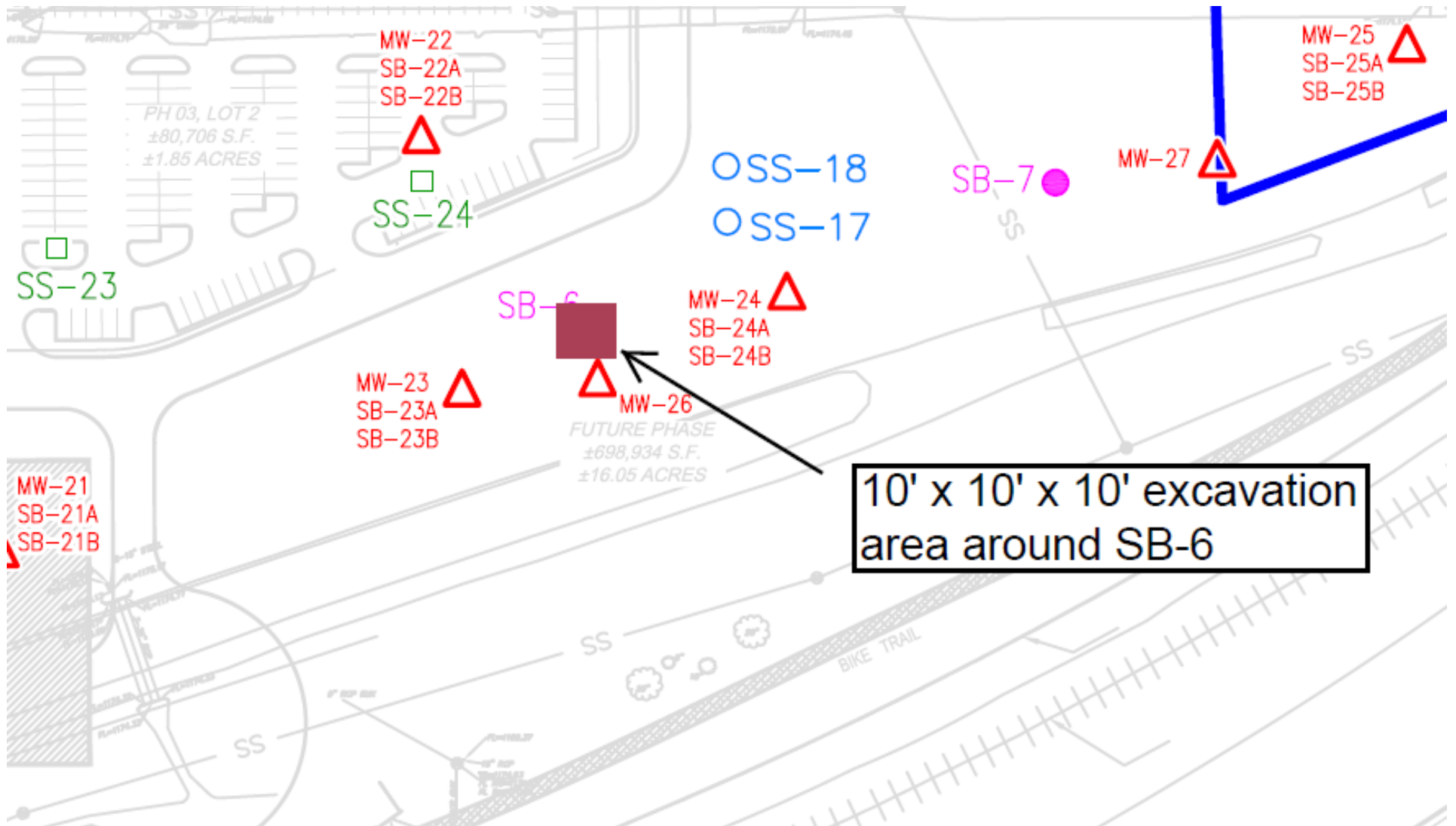
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Oklahoma City, OK

If you have any questions or need additional information, please contact our office at your convenience.

Sincerely,
Oklahoma Environmental Services

Attachments

1. Site Map of Excavation Area
2. Davis-Bacon Poster



10' x 10' x 10' excavation area around SB-6

EMPLOYEE RIGHTS

UNDER THE DAVIS-BACON ACT

FOR LABORERS AND MECHANICS EMPLOYED ON FEDERAL OR FEDERALLY ASSISTED CONSTRUCTION PROJECTS

PREVAILING WAGES

You must be paid not less than the wage rate listed in the Davis-Bacon Wage Decision posted with this Notice for the work you perform.

OVERTIME

You must be paid not less than one and one-half times your basic rate of pay for all hours worked over 40 in a work week. There are few exceptions.

ENFORCEMENT

Contract payments can be withheld to ensure workers receive wages and overtime pay due, and liquidated damages may apply if overtime pay requirements are not met. Davis-Bacon contract clauses allow contract termination and debarment of contractors from future federal contracts for up to three years. A contractor who falsifies certified payroll records or induces wage kickbacks may be subject to civil or criminal prosecution, fines and/or imprisonment.

APPRENTICES

Apprentice rates apply only to apprentices properly registered under approved Federal or State apprenticeship programs.

PROPER PAY

If you do not receive proper pay, or require further information on the applicable wages, contact the Contracting Officer listed below:

LABORER (Adair County) Common or General prevailing wage is \$12.41. A higher minimum wage may apply under Executive Order 14026 (\$16.20). Additionally, Executive Order 13706 applies for contractors subject to Davis-Bacon requirements (up to seven days of payed sick leave annually).

The Contracting Officer for this Project is LaKeesha Sirls, Phone 405 522-2048

or contact the U.S. Department of Labor's Wage and Hour Division.



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

1-866-487-9243
TTY: 1-877-889-5627
www.dol.gov/whd

