



P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

June 20, 1991

Mr. Coby Muckleroy
NMED - Hazardous and Radioactive Waste Bureau
Harold Runnels Building
1190 St. Francis Dr, POB 26110
Santa Fe, NM 87502



Re: Notice of Violation #NMD000761627

Dear Mr. Muckleroy:

This letter is in response to the letter from Ms. Patricia Ringgenberg of your office to El Paso Natural Gas Co. (EPNG) on May 20, 1991.

The May 20 letter referenced 40 CFR 265.16(d)(2) and indicated that written job descriptions were required for the mercury project personnel. Enclosed is the information to fulfill the requirements of 40 CFR 265.16(d)(2). The job descriptions are taken out of the Mercury Meter Site Investigation/Remediation Project Work Plan. Also provided is the introductory and ongoing training as well as the qualifications/experience for each position. The additional information has been incorporated into EPNG's work plan.

EPNG's mercury project involves the remediation of soil at field locations, transportation of the soil to a central collection point and final transportation to a permitted treatment, storage and disposal facility (TSD). The soil is always transported to the TSD within 90 days.

EPNG has an ongoing "in-house" audit program performed by the QA/QC inspector and Environmental Affairs Department (EAD) representatives that provide a means for continually training and enhancing the performance of the personnel on the project. An outside consultant also audits the project on an annual basis and provides a report which is used to refine the project training program.

I hope that the information submitted demonstrates EPNG's commitment to meeting the regulatory requirements. If you have questions regarding this matter or need additional information, please call me at (915)541-3135.

3531

Very truly yours,

Thomas D. Hutchins

Thomas D. Hutchins, Manager
North Region Compliance Engr.

MERCURY METER SITE INVESTIGATION/REMEDIATION PROJECT
JOB DESCRIPTIONS*TRAINING*QUALIFICATIONS*EXPERIENCE

JOB TITLE: Project Manager

JOB DESCRIPTION:

- * Schedules field activities
- * Performs Data Management
- * Oversees Project Budgeting
- * Coordinates Company Manpower Management
- * Coordinates Contractor Activities
- * Performs Project Coordination
- * Completes Monthly Status Reports

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * Supervisory experience with El Paso Natural Gas Company
- * Engineering degree or equivalent based on education and/or experience
- * An understanding of natural gas production, gathering and treating
- * An understanding of the regulatory requirements for hazardous waste generation, management and disposal
- * The ability to communicate and work with regulatory agencies and industry groups
- * Proven knowledge of budget and contract preparation

JOB TITLE: Compliance Manager

JOB DESCRIPTION:

- * Advises the Project Manager in all areas of the project
- * Manages the Quality Assurance/Quality Control functions
- * Coordinates the Health & Safety activities
- * Monitors the progress and direction of the project
- * Monitors compliance of the project with quality assurance objectives and procedures
- * Provides final rulings on interpretations of the Work Plan, Quality Assurance Plan and Health and Safety Plan
- * Supervises the QA/QC personnel and Lab Coordinator

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * Supervisory experience with El Paso Natural Gas Company
- * Engineering degree or equivalent based on education and/or experience
- * An understanding of natural gas production, gathering and treating
- * A substantial understanding of the regulatory requirements for hazardous waste generation, management and disposal
- * Substantial experience in investigation and remediation projects
- * The ability to communicate and work with regulatory agencies and industry groups
- * An understanding of laboratory quality assurance/quality control requirements and procedures
- * Knowledge of the health and safety issues/risks related to the remediation of hazardous wastes

JOB TITLE: EAD Task Manager

JOB DESCRIPTION:

- * Ensure that the Work Plan, QAPP, Health & Safety Plan and all project activities are in accordance with all current applicable regulations
- * Coordinate all regulatory agency matters with the project's Regulatory Liaison Consultant
- * Administer the contracting of all project laboratories, hazardous waste disposal, and resource recovery operations.
- * Coordinate all QA/QC oversight performed by the consultants; and screen and advise on all corrective measures recommended by consultants.
- * Administer the collection and storage of all validated project records, data, and calculations.
- * Provide project consulting in all technical areas
- * Distribute all consultant correspondence to the project team.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * Engineering degree or equivalent based on education and/or experience
- * An understanding of natural gas production, gathering and treating
- * Substantial knowledge of the regulatory requirements for hazardous waste generation, management and disposal
- * The ability to communicate and work with regulatory agencies and industry groups
- * Experience in contract scoping, negotiating and procurement for environmental projects
- * Knowledge of records retention systems and requirements

JOB TITLE: Regulatory Liaison Consultant

JOB DESCRIPTION:

- * Participate in communications with federal and state agency personnel on the behalf of EPNG
- * Provide regulatory interpretations
- * Work with consultants on developing presentations to the agencies and answering agency questions
- * Provide guidance to company and contract personnel in working with the agencies

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * Substantial experience in working with federal and state agencies on environmental projects
- * An understanding of natural gas production, gathering and treating
- * An thorough knowledge of the regulatory requirements for hazardous waste generation, management and disposal
- * The ability to communicate and work with regulatory agencies and industry groups
- * An understanding of laboratory and field quality assurance/quality control requirements and procedures

JOB TITLE: QA/QC Officer

JOB DESCRIPTION:

- * Verify that sampling and analytical operations are performed in compliance with the QAPP.
- * Perform audits of field procedures and lab documents and specify corrective action as required.
- * Provide training to the remediation personnel to correct any deficiencies identified.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * Substantial knowledge of QA/QC protocol and procedures.
- * Experience on environmental investigation and remediation projects.
- * Substantial knowledge of laboratory analytical techniques.

JOB TITLE: Lab Coordinator

JOB DESCRIPTION:

- * Coordinate receipt of samples from field, chain of custody validation and shipment of samples to contract labs.
- * Prepare and maintain soil to be used for field blank samples.
- * Coordinate with the designated analytical laboratories including lab audits.
- * Validate or oversee validation of chemical analysis results.
- * Approve chemical analysis results for entry into the validated data base.
- * Serve as alternate QA/QC Officer
- * Develops and/or verifies analytical procedures and specifications for project samples.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * Substantial knowledge of sample collection, validation and transportation requirements.
- * Substantial knowledge of laboratory analytical techniques and procedures.
- * Knowledge of data validation and data entry protocol
- * Chemistry degree or equivalent based on education and/or experience.

JOB TITLE: QA/QC Inspector

JOB DESCRIPTION:

- * Inspects all site records submitted by the Field Specialist for accuracy, completeness, consistency and legibility.
- * Maintain a log book for recording all observed deficiencies and corresponding corrective action.
- * Enters all validated sample data into the data base.
- * Provides updates to QA Officer, Project Manager, Lab Coordinator and EAD Task Manager as needed.
- * Responsible for the sample receiving, shipping, and supply activities.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
 - * Annual 8 Hour Refresher Course on Hazardous Waste Operations
 - * Knowledge of the proper sample collection, documentation and shipment procedures.
 - * Knowledge of computer data bases and data entry procedures.
- *****

JOB TITLE: Field Operations Coordinator

JOB DESCRIPTION:

- * Supervise and schedule work crews.
- * Conduct all crew safety meetings.
- * Procure, manage, and distribute all field supplies, equipment, and materials.
- * Ensure the proper maintenance and calibration of field instruments and equipment.
- * Coordinate loading, weighing and manifesting of the soil from the central collection facilities to the TSD facility.
- * Administer the budget associated with field operations.
- * Ensure the field activities conform to the Work Plan, QAPP, and Health & Safety Plan requirements.
- * Provide or coordinate initial and ongoing training for field crews.
- * Obtain validated forms from the Lab Coordinator, perform additional verifications, enter pertinent data into the project's data base, organize and release data to the EAD Task Manager.
- * Coordinate Emergency Response training and responses to actual emergencies

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * Excavation Training - Competent Person
- * Knowledge of First Aid and CPR techniques.
- * Knowledge of requirements for remediating, transporting and disposing of hazardous wastes.
- * Knowledge of the projects Work Plan, QAPP and Health & Safety Plan.
- * Substantial experience on projects requiring strict adherence to procedures and documentation of activities.
- * An understanding of natural gas production, gathering and treating

JOB TITLE: Field Specialist

JOB DESCRIPTION:

- * Implement EPNG's Health & Safety Plan for EPNG employees or contract helpers under EPNG's direct supervision.
- * Record all site and sample information; Complete chain of custody forms, Meter Site Data Forms, and all other required forms.
- * Collect, preserve and document site samples in accordance with the QAPP procedures.
- * Coordinate and supervise all on site activities.
- * Perform site assessments, screening and soil remediation as required.
- * Coordinate movement of the soil from the individual sites to the central collection facilities.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 8 Hour Supervisory Training for Hazardous Waste Operations
- * 24 Hour Hazardous Waste Operations - "On the Job" field training
- * Hot Work Permit Training - In House
- * First Aid and CPR Training provided by In-House Safety
- * An understanding of natural gas production, gathering and treating.

MEDICAL SURVEILLANCE FOR SPECIALISTS

- * Baseline Physical (Prior to working on the project)
- * Annual Physical (Active Employees)
- * Exit Physical (Inactive Employees)
- * Monthly Urinalysis (Active Employees)

JOB TITLE: Field Helpers

JOB DESCRIPTION:

- * Perform removal and reinstallation of the meter house where required.
- * Set up the decontamination and exclusion zones at each location requiring remediation.
- * Perform the soil removal using manual labor or mechanized equipment at each location requiring remediation.
- * Decontaminate any tools or equipment utilized during remediation.
- * Assist any loading of soil for shipment as required.

TRAINING/QUALIFICATIONS/EXPERIENCE:

- * 40 Hour Hazardous Waste Operations per 29 CFR 1910.120
- * Annual 8 Hour Refresher Course on Hazardous Waste Operations
- * 24 Hour Hazardous Waste Operations - "On the Job" field training.
- * Knowledge of the Work Plan and Health & Safety Plan.
- * Knowledge of hazardous waste remediation activities.
- * Knowledge of First Aid and CPR techniques.

MEDICAL SURVEILLANCE FOR FIELD HELPERS:

- * Baseline Physical
- * Annual Physical (Active Employees)
- * Exit Physical (Inactive Employees)
- * Monthly Urinalysis (Active Employees)

JOB TITLE: Health & Safety Officer

JOB DESCRIPTION:

* Oversee and/or conduct all training provided to field crews associated with the Health & Safety program.

* Ensure that all site activities are conducted in accordance with the Health & Safety Plan.

* Provide field audits of health and safety procedures and implement corrective measures.

* Evaluate mercury vapor levels for Level B PPE requirement, and provide oversight of all activities involving Level B PPE.

* Verify the medical and training qualifications of personnel that will participate in the field activities.

* Monitor the medical surveillance program and approve personnel to continue participation in the field activities.

* Oversee all field crew safety meetings.

* Audit maintenance and calibration of health and safety related instruments.

TRAINING/QUALIFICATIONS/EXPERIENCE:

* 40 Hour Hazardous Waste Operations per 29 CFR 1910.120

* Annual 8 Hour Refresher Course on Hazardous Waste Operations

* 8 Hour Supervisory Training for Hazardous Waste Operations

* Excavation Training - Competent Person

* Substantial knowledge and experience in health and safety requirements and training.

* Substantial experience in performing safety audits.

* Substantial experience in working with and calibrating health and safety monitoring equipment.

* Knowledge of the regulatory limits for mercury exposure and the PPE required for each exposure level.



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico 87503

EPNG GENERAL
S&S AW
JUDITH M. ESPINOSA
SECRETARY
RON CURRY
DEPUTY SECRETARY

May 20, 1991

Mr. John C. Bridges
El Paso Natural Gas Company
P.O. Box 1492
El Paso, Texas 79978

RE: Mercury Demonstration Project

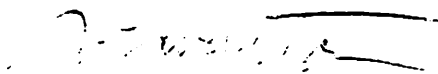
Dear Mr. Bridges:

I have received a letter from you dated May 16, 1991 and wish to correct an apparent misunderstanding. During our telephone conversation of several weeks past, I did not mean to imply that your mercury recovery demonstration project would not require a permit for operation. EPNG must submit information regarding this project through proper channels for Department review.

Please submit such information to Dr. Elizabeth Gordon.

If you have any questions regarding this matter, please contact Dr. Gordon at (505) 827-2926.

Sincerely,


Dr. Bruce A. Swanton, Compliance Supervisor
Hazardous and Radioactive Waste Bureau

cc: Benito J. Garcia