



BRUCE KING
GOVERNOR

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ENVIRONMENT DEPARTMENT
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JUDITH M. ESPINOSA
SECRETARY

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DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 17, 1993

Larry Campbell
Compliance Environmentalist
Transwestern Pipeline Company
Technical Operations
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Closure Plan Request and Part A Application Comments

Dear Mr. Campbell:

In accordance with the New Mexico Hazardous Waste Management Regulations (HWMR-7) Part VI, Section 40 CFR 265.112(a), the owner or operator of a hazardous waste management facility must have a written closure plan by May 1, 1981 and, until final closure is certified in accordance with HWMR-7, Part VI, Section 40 CFR 265.115, a copy of the most current plan must be furnished to the Secretary of the NMED upon request, including request by mail. On behalf of the Secretary of the NMED, the HRMB is requesting a copy of your closure plan for the Roswell Compressor Station.

The plan must address all the requirements of HWMR-7, Part VI, Section 40 CFR 265.110 through 265.116. You must submit the closure plan to Barbara Hoditschek, RCRA Permit Program Manager of the HRMB by May 1, 1993. The information and reports generated by the items listed in your December 15, 1992, letter to Edward Horst of the HRMB may be used in developing the formal closure plan.

Additionally, if the unit is to be closed as a landfill, you must have a post-closure plan. Please submit a post-closure plan for the Roswell Compressor Station hazardous waste management unit by May 1, 1993, if the unit will be closed in-place with hazardous wastes or hazardous waste constituents above health based concentration levels. Post-closure plans must meet the requirements of HWMR-7, Part VI, Section 40 CFR 265.117 through 265.120.

Enclosed are our comments on the Part A application for a disposal surface impoundment Transwestern Pipeline Company submitted on January 5, 1993. Please submit a new or amended Part A application which addresses these comments within 30 days of your receipt of this letter.

February 17, 1993
Larry Campbell
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Please contact me or Marc Sides of the HRMB RCRA Permit Program at
(505) 827-4308 if you have any questions.

Sincerely,



Barbara Hoditschek, RCRA Permit Program Manager
Hazardous and Radioactive Materials Bureau

Enclosure

cc: Barbara Hoditschek, HRMB
Marc Sides, HRMB
Edward Horst, HRMB
Steve Alexander, HRMB
David Neleigh, EPA Region 6, (6H-PN)

DEFICIENCY COMMENTS

Part A Application for the Transwestern Pipeline Roswell Compressor Station dated December 16, 1992

1. Section XI., Page 5 of 7: Please clarify what is meant by "scrubbed" in this section. Is this treatment of hazardous waste?
2. Section XIV., Page 6 of 7: This Section needs to clarify the annual quantity of waste received by the unit as it relates to the unit's capacity described in Section XII of the Part A Application as follows:
 - A. Include a narrative explanation in Section XIV estimating the quantity of waste received each year for each waste code and specify the number of years that the unit received the waste.
 - B. Explain the reasons for using a 3,061,487 gallon surface impoundment to receive the relatively small amount of hazardous wastes listed in Section XIV. (e.g. did the unit received both hazardous and nonhazardous waste?)
 - C. Please estimate the annual quantity more accurately than "< 10 K".
 - D. Also include a statement in Section XIV that no hazardous wastes are currently being placed in the unit or will be placed in the unit in the future.
3. Section XV., Page 7 of 7: Enclosed is the topographic map that you submitted with the Part A Application. The map needs to be revised as follows:
 - A. The legal boundaries of the facility;
 - B. The location and serial number of each of your intake and discharge structures, if applicable;
 - C. All hazardous waste management facilities;
 - D. Location of all processes listed in Item XII of the Part A Application listed by process code;
 - E. Each well where you inject fluids underground; and
 - F. All springs and surface water bodies in the area, plus all drinking water wells within 1/4 mile of the

facility which are identified in the public record or otherwise known to you.

If an intake or discharge structure, hazardous waste disposal site, or injection well associated with the facility is located more than one mile from the plant, include it on a map, if possible. If not, attach additional sheets describing the location of the structure, disposal site, or well, and identify the U.S. Geological Survey (or other) maps corresponding to the location. On each map, include the map scale, a meridian arrow showing north, and latitude and longitude at the nearest whole second. On all maps of rivers, show the direction of the current.

You may trace your map from a geological survey chart, or other map meeting the above specifications. If you do, your map should bear a note showing the number or title of the map or chart it was traced from. Include the names of nearby towns, water bodies, and other prominent points.

4. Section XVI., Page 7 of 7: Attached is the facility drawing that you submitted with the Part A Application. Please revise the drawing as described below: This drawing must show the general layout of the facility on a 8 1/2" by 11" sheet of paper. This drawing should show:
 - A. The drawing must be legible;
 - B. The areas occupied by all storage, treatment, or disposal operations;
 - C. The name of each operation (example - pit, surface impoundment, drum storage area, etc.);
 - D. Areas of past storage, treatment, or disposal operations; and
 - E. The approximate dimensions of the property boundaries and all storage, treatment, and disposal areas.

5. Section XVII., Page 7 of 7: All existing facilities must include photographs that clearly delineate all existing structures; all existing areas for storing, treating, or disposing of hazardous waste; all known sites of future storage, treatment, or disposal operations. Photographs may be color or black and white, ground-level or aerial. Indicate the date the photograph was taken on the back of each photograph. Use the hazardous waste process codes to indicate the location of all storage, treatment, or disposal areas.