



File

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**Transwestern Pipeline Company**  
TECHNICAL OPERATIONS  
P. O. Box 1717 • Roswell, New Mexico 88202-1717

October 25, 1993

~~10/27~~  
VXIT



Mr. Steve Alexander  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
525 Camino de los Marquez  
Santa Fe, New Mexico 87502

Re: Confirmation Sampling of Mercury Contaminated Sites in  
New Mexico

Dear Mr. Alexander:

On October 25, 1993, we had discussed the New Mexico Environment Department's (NMED) technical concerns for confirmation soil sampling (grab versus composite) of excavated oil and gas sites which had received historic releases of mercury onto the soil. As no State guidelines have been adopted addressing this issue, Transwestern was concerned as to a methodology which would be approved by the NMED and yield information verifying the levels of mercury remaining in the soil.

As a result of our discussion, presented below is Transwestern Pipeline Company's sampling procedure to confirm that the undisturbed soil material remaining in the excavation is below the State of New Mexico regulatory target limit.

At sites in New Mexico confirmed to test positive for soil mercury above the applicable 15/140 ppm target level, visible mercury will be removed from the soil surface. Excavation activities will be conducted until all visible mercury has been removed. Contaminated soil materials from the excavation efforts will be placed into dedicated containers for transport and disposal.

Confirmation soil sampling will consist of a composite sample taken in the following five (5) locations of the excavation floor: at each of the four corners and in the approximate floor center.

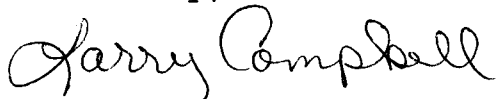
Transwestern Pipeline has contracted the services of a mobile laboratory to remain onsite at each location to perform field screening activities of all soil samples taken. Composite samples as identified above will be split. One of the

composites will be analyzed for mercury concentration using x-ray fluorescence (XRF). The attached letter from the State of New Mexico attests to the reliability this technology.

If the XRF results record a mercury level below the 15/140 ppm level, the remaining sample split will be submitted to a commercial certified laboratory for final mercury determination. If the XRF analyses report a soil mercury level above the 15/140 ppm target level, excavation activities will continue until a sample is collected and determined by the XRF to be below the 15/140 ppm level. A split of this soil sample will then be sent to the certified laboratory for the reportable mercury level.

At this time, Transwestern Pipeline Company intends to initiate mercury remediation activities on November 1, 1993. In order to complete this project in a timely manner and in approval with the State of New Mexico, please comment to my attention at your earliest convenience. I can be reached at the Roswell Technical Operations at 505 625-8022.

Sincerely,



Larry Campbell  
Division Environmental Specialist

xc: Greg McIlwain  
Lou Soldano Enron Legal  
Mike Kneese Hobbs Plant  
file

**COPY**

June 25, 1993

Mr. Don Weber  
Analytical Technologies, Inc.  
9830 South 51st Street, Suite B-113  
Phoenix, AZ 85044

RE: NMED use of the portable XRF.

Dear Don:

I am pleased to respond to your questions concerning the use of the portable XRF by the New Mexico Environment Department (NMED).

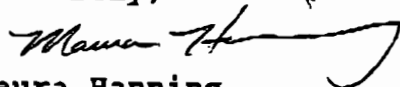
NMED purchased the a Spectrace 9000 roughly a year ago for use in site investigations and site remediation. The instrument was originally purchased for a remediation project at a mining site. Mine wastes had been used as road base in several campgrounds and were found to contain levels of lead that posed a health threat. The XRF was used during the waste removal process to determine whether the backhoes had adequately removed the wastes. In addition to use of the XRF, confirmation samples were also collected for laboratory analysis. Use of the XRF resulted in a tremendous savings as NMED would have had to collect several (magnitudes) more soil samples to demonstrate proper removal of the mine wastes.

NMED also uses the XRF for preliminary site assessments to determine whether metals are present at a site (primarily mining sites). This cursory determination aids us in our decision as to whether to proceed with further investigation of the site and to determine whether there are any immediate health threats posed by the site. If NMED proceeds with further investigation of the site, the XRF is used to screen several sampling locations to ensure that a representative sample is collected.

The New Mexico Health Department is also considering the use of the XRF to screen paint for lead. The Spectrace 9000 has a lead in paint software application that would be suitable for such screening.

If you have any questions concerning use of the portable XRF by NMED, please call me at (505) 827-2922 or John Pheil at (505) 827-2776.

Sincerely,



Maura Hanning  
Superfund Section  
Groundwater Protection and Remediation Bureau



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