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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 28, 1994

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company
Roswell, New Mexico 88202-1717

**RE: Notice of Technical Deficiency (NOD) of Closure Plan for
Roswell Compressor Station Surface Impoundments.**

Dear Mr Campbell:

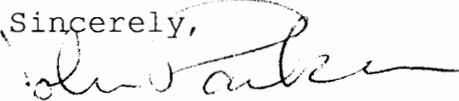
The New Mexico Environment Department (NMED) has reviewed for technical adequacy, the May 31, 1994 Transwestern Pipeline Company (TW) Closure Plan for Roswell Compressor Station Surface Impoundments as required under the Resource Conservation and Recovery Act (RCRA).

After reviewing the Closure Plan, NMED has found it to be technically deficient. The enclosed attachment lists the required information.

The information requested in the attachment must be submitted to NMED within thirty (30) days of receipt of this NOD. Failure to submit the required information in this designated time may result in our proposal to disapprove the closure plan or an appropriate enforcement act.

If you have any questions about how detailed your responses to any deficiency item should be, contact Ms. Teri Davis or Mr. Cornelius Amindyas at 827-4308 for further discussion.

Sincerely,


Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Barbara Hoditschek, HRMB
Tracy Hughes, NMED
David Neleigh, EPA Region 6, w/Enclosures
Teri Davis, HRMB
File Red-94

ATTACHMENT

CLOSURE PLAN FOR ROSWELL COMPRESSOR STATION SURFACE IMPOUNDMENTS

NOTICE OF DEFICIENCY

September 28, 1994

NOTE: (1) The sections and pages quoted in parentheses correspond to the sections and pages of the May 31, 1994 cover letter and Closure Plan that Transwestern Pipeline Company (TW) submitted to the New Mexico Environment Department/Hazardous and Radioactive Materials Bureau (HRMB).

(2) The New Mexico Hazardous Waste Management Regulations formerly written as **HWMR-7**, shall from now henceforth be written as **20 NMAC 4.1**.

1. Performance Standards: 20 NMAC 4.1, Subpart VI, 40 CFR, §265.112

(Cover Letter): As stated in May 31, 1994 TW cover letter, "the compounds which have triggered RCRA involvement at this site are present in concentrations below USEPA proposed action levels for RCRA closure (proposed Subpart S, 7/27/90)". It should be clarified that acceptable ground water protection standards for RCRA units are derived using the guidance of Subpart S (Appendices A[Examples of Concentrations Meeting Criteria for Action Levels], B[Maximum Contaminant Levels], and C[Range of Concentrations for Establishing Media Protection Standards for Carcinogens]), plus New Mexico and U.S. EPA Drinking Water Standards, as well as risk assessment-derived concentrations that consider the effects of multiple constituents [52 FR No. 53 p. 8706, March 19, 1987].

Semi-volatile organic compounds (SVOC), volatile organic compounds (VOC), and metals have been detected above acceptable levels in the ground water of the uppermost aquifer underlying the subject regulated units (see Tables 3-4 and 3-5 of Closure Plan). The determination of a release from the unit(s) has already been shown by previous analysis indicating concentrations of SVOC, VOC, and metals above appropriate regulatory levels.

The Toxicity Characteristic Leaching Procedure (TCLP) is designed to determine the mobility of both organic and inorganic analytes present within wastes. This test is not appropriate for comparison with concentration limits to be established in the closure plan to ensure hazardous constituents do not exceed ground water protection standards. Ground water monitoring for 20 NMAC 4.1, Subpart V, 40 CFR, §264 Appendix IX constituents should be proposed in the closure plan in lieu of TCLP for ground water evaluations.

2. Corrective Action Plan: 20 NMAC 4.1, Subpart V, 40 CFR, §264.97 and 264.112

(Section 1.2, Page 2): Bullet #7 indicates that TW intends to apply for clean closure certification. However, data indicates that the uppermost aquifer has already been impacted. TW must therefore provide HRMB with detailed ground water assessment and ground water remediation plans, as well as the time frames associated with ground water remediation at similar sites.

3. Location of Surface Impoundments

(2.1, Page 5): The latitude and longitude of all three surface impoundments should be included in this section.

4. Hazardous Waste Inventory

(Section 2.2, Page 6): This section must contain information describing knowledge of process for the spent halogenated solvents (F001 wastes). How were these wastes utilized at this facility, what was the disposal practice (burning pits?), and how much of the waste was handled at the facility during what periods of time, etc? What prompted TW to believe that a contamination problem may exist at the compressor station? What led to the initial soil gas survey? TW must explain and clarify these comments.

5. Releases from Surface Impoundments: 20 NMAC 4.1, Subpart V, 40 CFR, §264 Subpart F

(Section 3.6.3, Page 26): The sentence "the lateral extent is bounded on-site by two clean monitoring wells along the northern (MW-5) and eastern (MW-3) fencelines" must be verified by Appendix IX sampling. Additionally, TW must determine the background water quality and specify the statistical method(s) that will be used in evaluating ground-water monitoring data for all hazardous constituents listed in Appendix IX. The background water quality evaluation must follow the requirements of 20 NMAC 4.1 Subpart V, Section 264 Subpart F.

6. Ground Water Elevations

(Section 3.6.3, Page 26): Ground water elevations are not included in this closure plan, preventing the evaluation of the direction of ground-water flow using MW 1B, 2,3, and 5. The closure plan must include estimates on the direction of ground water flow, based on data from monitoring wells completed within the uppermost aquifer and screened within the same elevation intervals.

7. (Section 3.6.3, Page 27): Include a descriptive summary of the ground water impacts in this section.

8. Waste Characterization: 20 NMAC 4.1, Subpart V, §264 Appendix IX
(Section 4.0, Page 28):

All surface impoundments should be characterized with respect to 20 NMAC 4.1, Subpart V, 40 CFR, §264 Appendix VIII hazardous constituents.

9. Soil Assessment Plan: (Section 4.1, Page 28):

A plan should be included in the Closure Plan to satisfy the sampling requirements of characterization at each impoundment. Based on the results from the surface impoundment characterization, a complete hazardous constituent list for the soil-assessment plan should be compiled for HRMB's approval.

10. (Section 4.1, Page 28, Fig.4-1):

The proposed soil boring locations in Figure 4-1 are inadequate to assess the extent of contamination. As mentioned in the March 7, 1994 NOD, the investigatory approach that will be used to fully characterize the rate, extent and concentrations of hazardous constituents and each investigatory phase involved must specify the number, location and depth of sampling; the rationale of sampling locations must be clearly stated. A phased approach to the soil assessment should be included in this section.

For example, if contamination is detected in the Phase I soil borings, a Phase II sampling plan will be submitted to HRMB for approval to further define the extent of soil contamination. A contingency sampling plan should be included in this section which will include such information as a predetermined distance (horizontal and vertical) and direction proposed to extend the sampling locations when contamination is detected in any of the soil borings. This approach will assure that the extent of contamination in a lateral manner and vertical manner has been assessed.

11. (Section 4.1, Page 28):

Include in this section a reference to the Standard Operating Procedures for assuring that cross-contamination between zones of saturation (perched zone and the uppermost aquifer) will not occur.

**12. Laboratory Analysis: 20 NMAC 4.1, Subpart V, 40 CFR, §264
Appendix IX
(Section 4.4, Page 30):**

Laboratory analysis of soil samples should include Appendix IX hazardous constituents for the soil samples characterizing the surface impoundments. Appropriate analytical methods and parameters should be in accordance with 20 NMAC 4.1, Subpart II, 40 CFR 261 Appendix VIII suggestions. Based on the results from the surface impoundments, the Director, Water and Waste Management Division (hereafter Director) will determine what hazardous constituents will constitute the list for sampling during the phased investigation for soil assessment. Table 5-1 should be revised as appropriate.

13. Ground Water Assessment Plan: (Section 5.1, Page 34).

All monitoring wells should be constructed in accordance with the U.S. EPA RCRA Ground-Water Monitoring Technical Enforcement Guidance Document (TEGD) (September 1986) and updates as appropriate from the EPA RCRA Ground-Water monitoring: Draft Technical Guidance (November 1992). The screened intervals proposed in the closure plan should not exceed fifteen feet within the aquifer.

14. (Section 5.1, Page 34):

The latitude and longitude of all monitoring wells to be utilized in the compliance monitoring program and corrective action program should be summarized in table form. The coordinate system utilized in correspondence with HRMB should be consistent. It is suggested that the location system shown in Table 3-1 be replaced with the latitude-longitude system for consistency with State Engineer Office records and surface impoundments descriptions.

15. (Section 5.1.1, Page 34).

HRMB understands that the proposed locations of the monitoring wells are tentative. TW should address the possibility that information gained from drilling monitoring wells closest to the impoundments may change the proposed location of monitoring wells shown in Figure 5-1.

16. (Section 5.1.1, Page 34).

The proposed monitoring well locations in Figure 5-1 are

inadequate to assess the extent of contamination. As mentioned in the previous NOD, the investigatory approach that will be used to fully characterize the rate, extent and concentrations of hazardous constituents and each investigatory phase involved must specify the number, location and depth of sampling. Also, the rationale of sampling locations must be clearly stated.

A phased approach to the ground water assessment needs to be included in this section. If contamination is detected in the initial downgradient monitoring wells, a Phase II sampling plan will be submitted to HRMB for approval to further define the extent of ground water contamination. A contingency sampling plan should be included in this section which will include such information as a predetermined distance and direction proposed to extend the sampling locations in a lateral and vertical manner to determine extent.

17. (Section 5.1.2, Page 35) .

The deep aquifer investigation should be a continuation of the ground water phased investigation. If ground water contamination is detected in any of the monitoring wells to be installed immediately from the regulated units, screened and completed as specified in the TEGD in the uppermost aquifer, the phased approach must be employed to investigate any contamination in the deep aquifer. In this case therefore, a deep monitoring well or deep monitoring wells must be installed to determine the vertical extent of contamination from the regulated units. TW must provide a proposal to install wells to determine the background conditions required in 20 NMAC 4.1, Subpart V, 40 CFR, Section 264. Mud rotary is not an acceptable drilling method for monitoring well installation or for determining hydrogeologic information while drilling. Air rotary is a more acceptable drilling method under these investigatory conditions.

18. (5.3, Page 37) :

This section should be revised to be consistent with the requirements of ground water sampling under 20 NMAC 4.1, Subpart V, 40 CFR, Sections 264.97 and 264.99.

19. (Section 5.4, Page 39) :

Laboratory analysis of ground water samples will consist of the 20 NMAC 4.1, Subpart V, 40 CFR Section 264, Appendix IX ground water monitoring list for all monitoring wells as outlined by the requirements of 20 NMAC 4.1, Subpart V, 40 CFR, Sections 264.99 and 264.97. Appropriate analytical methods and parameters should be in accordance with 20 NMAC 4.1, Subpart II, 40 CFR, Section 261, Appendix VIII suggestions. Based on the analytical results

from the initial monitoring wells, the Director will determine what parameters can be excluded from the Appendix IX list during the phase I ground water assessment plan. Table 5-1 should be revised as appropriate.

20. (Section 5.3, Page 38):

The interface between the Phase Separated Hydrocarbons (PSH) and water level should be determined by use of appropriate equipment or probes. The procedures for detecting and measuring immiscible layers should be outlined in the Quality Assurance Project Plan. Guidance on this procedure should follow EPA RCRA Ground Water Monitoring: Draft Technical Guidance (November 1992).

21. (Section 6.1, Page 43):

This section should be changed in accordance with comment #19 and 20 NMAC 4.1, Subpart V, Section §264 requirements.

22. (Section 6.2, Page 45):

Detection limits for EPA methods in Table 5-2 should be consistent with comment # 19.

23. Interim Measures: (Section 7.1, Page 51):

The interim measures involving the PSH recovery system should continue. However, MW-1 should be plugged and abandoned to prevent any further cross-contamination between the 30 foot and 70 foot zones of saturation beneath the unit. A proposal for generic plug and abandonment procedures must be included in the closure plan which should be sent under separate cover to HRMB for approval.

24. Remedial Options: (Section 7.3, Page 52):

HRMB is reserving comment on the soil and ground-water remedial options until the soil and ground-water assessments are complete and a baseline risk-assessment has been conducted. Guidance on the process of corrective action can be found in Closure process.

25. (7.5, Page 56):

Clean-up criteria should be established through a risk assessment in order to determine the risk associated with multiple contaminants. The Subpart S Standards are action levels and not necessarily cleanup standards. If a hazardous constituent is

found to be above Subpart S action level then further investigation is triggered. Guidance for risk assessment can be found in EPA's Risk Assessment Guidance for Superfund (RAGS) manuals. A baseline Risk Assessment (RA) should be proposed after the results of the phase I soil and ground water sampling results have identified the hazardous constituents that will be specified in the Closure Plan and the extent of contamination has been determined. The baseline RA will aid in determining the media cleanup standards for contamination in soil and ground water underlying the regulated units at TW.

26. (Section Table 3.1):

The elevations of monitoring wells need to be determined by a certified professional surveyor.

27. (All Tables):

Tables showing analytical results should include a column showing appropriate regulatory levels for comparison to the data.

28. (Figure 3-5):

Pit 3 is labeled twice, and pit 2 is missing. This should be corrected.

29. (All Figures):

The locations of MW-2 and MW-5 are not consistent with past documents submitted to HRMB. This discrepancy needs to be clarified.

30. (Appendix E):

The data for MW-2 is missing. The data for MW-2 should be included in this section.

31. HRMB requests a copy of your worker health and safety documentation for the closure plan. However, it is the facility's responsibility to maintain working conditions that insure worker health and safety, pursuant to 24 CFR, Section 1910.120. Therefore liability for operations relating to worker health and safety remain with Transwestern Pipeline Company.