

TWP 94

MEMORANDUM

TO: Cornelius Amindyas, RCRA Permitting Program

FROM: Teri Davis, Technical Compliance Program

THROUGH: Ron Kern, Program Manager

DATE: November 22, 1994

SUBJECT: **Review of Transwestern Pipeline Company (TW)'s  
Procedure and Methods for Installation of an Upgradient  
Monitor Well, November 9, 1994, for Roswell Compressor  
Station, Surface Impoundments Closure Plan.**

- 1.0 Reference should be made to Standard Operating Procedures (SOP) for assuring that cross-contamination between zones of saturation will not occur. This comment was made in the September 28, 1994 Notice of Deficiency (NOD). The SOP from the submitted May 31, 1994 Draft Closure Plan can be referenced.

If soil staining is observed in the split spoon sampler, then that specific portion of the five-foot interval should be sampled and sent to a laboratory for analysis. This should be written into the Sampling and Analysis Plan (SAP).

From the statement, "and the other for potential delivery to a laboratory for sample analysis", it is unclear which samples will be sent to the laboratory. This needs clarification.

EPA Method 8240 is not inclusive of all Volatile Organic Compounds (VOC) specified within 40 CFR Part 261 Appendix VIII. Generally, analysis of VOC for RCRA purposes will include at a minimum EPA SW-846 Methods 8240/8010/8015 or equivalent methods.

As stated in the November 9, 1994 SAP, "The purpose of the selected analyses is to confirm that the soil boring is in fact outside the immediate area of any potential contamination source.", HRMB will not recognize this "purpose" without a complete Appendix VIII sampling. As stated in the September 28, 1994 NOD and reiterated in our November 1, 1994 meeting, previous analyses, indicating the presence of VOC, metals, and Semi-Volatile Organic Compounds (SVOC), have shown that the ground water beneath the RCRA unit has been impacted above acceptable regulatory levels. The procedures for sampling should follow EPA RCRA Sampling Procedures, the parameters are specified within 40 CFR 264 Appendix VIII, and analytical methods should be in accordance with EPA Test Methods for evaluating Solid Waste, Physical/Chemical Methods, SW-846.

2.0

As a suggestion, the diameter of this well may be weighed with the need to have a larger diameter well available for conducting aquifer pumping tests in the future. As the location of this monitoring well will presumably be upgradient of the plume, this may be an ideal location for a pumping well during an aquifer pumping test.

As stated on page 4 of 14, Section 13.4 of the Closure Plan, "casing materials that are inert to the subsurface" will be used. Toluene, xylene, and aromatic hydrocarbons have been detected in the ground water beneath the RCRA unit. PVC may deteriorate in the presence of these constituents. It is recommended that the above information be considered when choosing the casing material to be utilized at this site.

3.0

Confirmation of well development should be defined by a turbidity test; the term "clear" should be qualified.

The purge method should be stated in this section (e.g. bailer, bladder pump, etc). Also, pH, temperature, specific conductance, dissolved oxygen, and turbidity should be measured after the extraction of each casing volume and before sampling to ensure stabilization of these parameters. Sampling procedures should follow EPA RCRA Sampling Procedures.

As stated above in section 1.0, HRMB will not recognize the "purpose" stated in this section, "The primary purpose of the selected analysis is to confirm that the monitor well is in fact outside and upgradient of any potential contamination source", without a complete 40 CFR Part 264 Appendix IX sampling.

4.0

What is the radius of influence from the two recovery wells MW-1 and RW-1? Will the water level measurements proposed be affected by pumping of these recovery wells? If the above questions can not be answered adequately then the direction of ground water flow should be determined when the recovery wells are not pumping.