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GOVERNOR

State of New Mexico  
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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

December 8, 1994

Mr. Bill Kendrick,  
Projects Group Manager  
ENRON Operations Corporation  
P.O. Box 1188  
Houston, Texas 77251-1188

**RE: Request for Granting of Extension on the September 28, 1994  
Notice of Deficiency (NOD), for the Transwestern Pipeline  
Company (TPC), Roswell Compressor Station Closure Plan**

**EPA I.D. No. NMD986676955**

Dear Mr. Kendrick:

The New Mexico Environment (NMED), Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of your request for a 75 day extension to present all the information listed in the September 28, 1994 Notice of Deficiency (NOD). The NOD was issued for the TPC Roswell Compressor Station Closure Plan for three former surface impoundments. In your letter of November 9, 1994 requesting the extension, you indicated that the modifications you plan to make to the Closure Plan include:

1. A phased approach soil assessment plan;
2. A phased approach ground water assessment plan; and
3. A soil and ground water sample analysis plan which will meet the criteria for a RCRA closure.

Enclosed is a list of HRMB comments on the plan you presented entitled "Procedures and Methods for Installation of an Upgradient Monitor Well".

Considering the time allotments for which TPC has committed to implementing the above projects to submit an acceptable Closure Plan, NMED hereby grants the 75 day extension of time to TPC to respond to the subject NOD. This extension is effective

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retroactively from October 3, 1994, the last day of the original deadline that was set by HRMB.

Therefore, we must receive your submittal no later than January 16, 1995. This submittal will be used to make a determination of the completeness of the Closure Plan.

If you have any questions regarding this matter you may contact Ms. Teri Davis or Cornelius Amindyas at (505) 827-4308.

Sincerely,

*Barbara Hoditscheck*  
Barbara Hoditscheck, Manager  
RCRA Permits Program  
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Bureau Chief, HRMB  
David Neleigh, US EPA - Region 6  
Larry Campbell, TPC  
Ron Kern, HRMB  
Teri Davis, HRMB  
File-Red 94

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.
- 5.0 Waste characterization requirements of each individual surface impoundment should be included as a primary modification to the Closure Plan.