

TWP 95

MEMORANDUM

TO: Cornelius Amindyas, RCRA Permitting Program
FROM: ^{7P} Teri Davis, Technical Compliance Program
THROUGH: Ronald Kern, Program Manager ^{RK}
Barbara Hoditschek, Program Manager
DATE: April 4, 1995
SUBJECT: { Transwestern Pipeline Company (TW)'s Proposal to
Conduct Waste-Unit Characterization of the RCRA Surface
Impoundments at the Roswell Compressor Station Outside
of the Closure Plan.

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HSWA

see file

TW proposed to conduct the waste-unit characterization portion of corrective action for the RCRA surface impoundments at the Roswell Compressor Station outside of the Closure Plan during the March 30, 1995 meeting. The rationale for this proposal was to obtain a hazardous constituent monitoring list prior to the development of the soil and groundwater assessment sections within the Closure Plan. This proposal does not seem to warrant justification. The waste-unit characterization and its associated plan are part and parcel of the Closure Plan, and subsequent steps of the Closure Plan depend upon a Closure Plan directed waste-unit characterization.

The list of hazardous constituents to be sampled for in the assessment phases of corrective action will be contingent upon the results of the waste-unit characterization. The sampling approach will not depend upon the results of the waste-unit characterization.

The post-closure care plan will include a corrective action program as required under 40 CFR Subpart F, G and Part 270 as appropriate for the surface impoundments. It is not recommended to separate various stages of corrective action between documents.