

File Red TWP



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 28, 1995

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

RE: Request for Additional Information

Dear Mr. Campbell:

During the meeting of March 30, 1995 between Hazardous and Radioactive Materials Bureau (HRMB) officials and representatives of Transwestern Pipeline Company (TW) in Santa Fe TW made a commitment to provide additional information to HRMB. It was also agreed that after HRMB has re-written the (TW) Closure Plan, a copy will be sent to TW. Transwestern Pipeline Company will then peruse the document and submit comments to HRMB within seven (7) days after the receipt of the document. TW comments will be considered for incorporation into the subject plan. The finalized plan will be Public Noticed for a period of thirty (30) days. During this period members of the public can send in written comments to HRMB regarding the proposed Closure Plan.

In order to expedite the development of the subject plan, the Hazardous and Radioactive Materials Bureau requests Submittals 1-4 below from Transwestern Pipeline Company within one week upon receiving this letter. Submittals 1-4 will be incorporated into TW's modified Closure Plan for Roswell Compressor Station RCRA Surface Impoundments. Submittals 5-7 below will be due within thirty (30) days following completion of work for waste unit characterization. Submittals 5-7 will be included as an amendment to the modified Closure Plan.

Submittal 1: TW shall develop a listing of petroleum refining hazardous constituents found in **List 4** (Industry Specific Monitoring Constituents) of U.S. EPA, May 1989, RCRA Facility Investigation (RFI) Guidance. This listing will be used for the waste-unit characterization of hazardous constituent monitoring list. The listing should include appropriate analytical methods and preparation techniques per hazardous constituent (EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, Third Edition, Update II).

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Submittal 2: TW shall develop a flow chart specifying activities and time-lines as discussed in our March 30, 1995 meeting. This project schedule will be submitted to HRMB for approval within 30 days of receipt of this notification. The approved schedule will be included in the modified closure plan in the appropriate section (e.g., Figure 7-1).

Submittal 3: The standards cited in the January 15, 1995 Closure Plan, Tables 3-2 through 3-5, either do not apply to action levels for RCRA regulated units (e.g., TCLP Limit) or are not representative of the lower applicable standard (e.g., in some cases U.S. EPA Drinking Water Standards are lower than Subpart S or NMWQCC standards and *vice versa*). The standards included in the tables shall be revised to reflect the lowest applicable action levels. As stated in a previous Notice of Deficiency (NOD) dated September 28, 1994, and at a meeting held between TW and HRMB on November 8, 1994, acceptable ground-water protection standards for RCRA units are derived not only using guidance from the New Mexico Water Quality Control Commission (NMWQCC) but also considering U.S. EPA Drinking Water Standards, as well as 40 CFR Subpart S guidance (Appendix A[Examples of Concentrations Meeting Criteria for Action Levels], Appendix B[Maximum Contaminant Levels], and Appendix C[Range of Concentrations for Establishing Media Protection Standards for Carcinogens] or other acceptable methodology. Soil action levels for RCRA units are derived with guidance from 40 CFR Subpart S or other acceptable methodology.

Submittal 4: TW shall submit a standard operating procedure (SOP) for the use of a mobile laboratory to be utilized during the soil assessment phase of corrective action for the analysis of total petroleum hydrocarbons (TPH). This SOP should include a section describing associated quality assurance and quality control (QA/QC) to be expected by the mobile laboratory for analysis of TPH. This submittal will be included in the SOP section of Appendix F within the modified Closure Plan.

Submittal 5: TW shall develop a listing of media-specific action levels, per Subpart S guidance or some other acceptable methodology (e.g. EPA Region 3 guidance), for all hazardous constituents found in Appendix IX of 40 CFR Part 264 and in List 4 (Industry Specific Monitoring Constituents) of U.S. EPA, May 1989, RCRA Facility Investigation (RFI) Guidance which are detected from waste-unit characterization. The algorithms employed should be clearly stated with all assumptions and input parameters listed with reference.

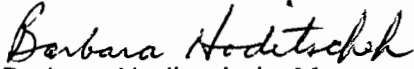
Submittal 6: TW shall develop a table of expected background concentrations for all hazardous metals presented in List 4 based on a literature review of similar environmental settings. Defendable statistical analysis of the data must be presented as well as the methodology employed during the background investigations and all appropriate references. The concentrations should be presented in constant units of measurement.

Submittal 7: TW shall develop a surface sediment/soil drainage sampling and analysis plan (SAP) to investigate the extent of contamination via this pathway. Based on the results of soil boring PS-OS-377, it appears that TPH extends well beyond the facility boundary migrating off-site by surface drainage transport. The SAP will be included in the approved modified Closure Plan as an amendment.

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Should you have any questions concerning this matter please contact Ms. Teri Davis of the Technical Compliance Program at 827-4308.

Sincerely,


Barbara Hoditschek, Manager
RCRA Permitting Program
Hazardous and Radioactive Materials Bureau

cc: Ronald Kern, HRMB
Teri Davis, HRMB
Cornelius Amindyas, HRMB
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