

TWP 95

MEMORANDUM
(confidential)

TO: Cornelius Amindyas, RCRA Permitting Program

FROM: Teri Davis, Technical Compliance Program

DATE: July 12, 1995

SUBJECT: **Differences Between Transwestern Pipeline Company (TW)'s Self-Directed Waste-Unit Characterization and the Revised Closure Plan for Roswell Compressor Station, Surface Impoundments.**

It is unfortunate that TW does not appear to want to wait another couple of weeks to receive the revised closure plan and follow the steps outlined within the plan. Some of the activities TW is proposing can possibly be acceptable for the requirements of the revised Closure Plan provided HRMB provides oversight for these activities. TW's past history of environmental investigations is not desirable and needs State oversight. The following are differences between TW's self-directed Waste-Unit Characterization and the revised Closure Plan:

- o Pits 1 and 2 are the only potential source areas to be investigated within TW's self-directed investigation. Pit 3 and SG-86 potential source areas are not included in TW's self directed investigation. MW-2 is downgradient from Pit 3, and has indicated the highest concentrations of constituents in groundwater at the site. TW's notification letter dated June 30, 1995 indicated that the objective of this self-directed characterization is to "identify waste constituents of concern and their respective maximum concentrations".
- o TW stated in our phone conversation, July 11, 1995, that they intend to follow the Standard Operating Procedures (SOP) contained in TW's last submitted Closure Plan, January, 1995. The waste handling procedures have been modified and differ significantly.
- o I agree that two samples from each source area will suffice for characterization purposes. However, the depth in the notification letter indicated about 15 feet for sample collection. The only concern here is that the samples are specifically collected below the base of the clean fill but no deeper than 2 feet below the base of the fill material.
- o From TW's notification letter HRMB has no assurance that proper Quality Assurance and Quality Control (QA/QC) will be followed. Also, it is unknown if the samples taken will be sent to an analytical laboratory or if a mobile lab will be employed. The closure plan does not allow for mobile lab use during the waste-unit characterization.

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- o The locations for groundwater monitoring wells shown in TW's notification letter are similar to what are specified in the closure plan. The problem with installing the wells at this time is that a complete list of monitoring constituents will not be known until after the waste-unit characterization is complete. I highly recommend that the ground-water installation phase does not begin until a complete waste-unit characterization is complete and HRMB approves the Waste-Unit Characterization Report as specified in the revised closure plan.