

TWP 95

MEMORANDUM

TO: Cornelius Amindyas, RCRA Permitting Program

FROM: <sup>70</sup> Teri Davis, RCRA Technical Compliance Program

THROUGH: Ronald A. Kern, Technical Compliance Program Manager *RAK*

DATE: November 5, 1995

SUBJECT: Technical Concerns of Transwestern Pipeline Company's Proposal to Exclude the Roswell Compressor Station Surface Impoundments from RCRA Regulatory Status

The following are technical concerns which arose from a review of Transwestern Pipeline Company's (TW) submittal to Tracy Hughes (NMED OGC) dated on October 11, 1995:

- 1) TW proposes that insufficient quantities of F001 (halogenated solvents) hazardous wastes were disposed in the surface impoundments (pits) at the Roswell Compressor Station to trigger Subtitle C regulation. TW noted that "during the prior investigation activities conducted at the site, the highest concentration measured of 1,1,1-trichloroethane(TCA), the most prevalent solvent detected at this site, was just 19.0 mg/kg "(detected in soil) .

TW has submitted three RCRA closure plans for the surface impoundments to the State over a time period of three years which were incomplete and inaccurate (see attached cover letters for the three Closure Plan Notices of Deficiencies ). Waste-unit characterization of the surface impoundments has been inadequate in the past. Previous investigations lacked analysis for appropriate 40 CFR, Part 264 Appendix IX parameters and also contained inadequate QA/QC. Therefore, the concentrations of solvents and all the contaminants of concern in the pits are currently unknown.

Additionally, ground-water contamination at this site includes solvents detected at 3 times the New Mexico Water Quality Control Commission (NMWQCC) standards for 1,1,1 TCA and 22,400 times NMWQCC standards for 1,1 DCA in ground water. These concentrations were reported to HRMB in the January 1995 draft Closure Plan (see attached summary of organic constituents). If , as proposed by TW, only small quantities of these solvents were disposed at this site, then NMED does not understand the levels of contamination found in the ground water beneath these pits.

- 2) Additionally, 2-Butanone (MEK) has been detected in the ground water at 220 ppb in monitoring well MW-1. MEK is typically used as a solvent. The presence of this hazardous constituent further casts doubt on the adequacy of the knowledge of process at these pits. Also the lack of knowledge of process is further questioned by a letter to

Transwestern Roswell Compressor Station

November 5, 1995

Page 2

HRMB from TW dated March 10, 1992 which states, "They (pits) were in service until 1986, when at that time, they (pits) were then backfilled " (see attached letter). TW states in this submittal that the surface impoundments were not used after 1983 and later backfilled in 1986; however, the last date of disposal appears to be in question.

- 3) Additionally, as noted within a HRMB confidential memorandum dated July 12, 1995, Pits 1 and 2 are noted as being the only pits to be investigated within TW's self-directed investigation. Pit 3 and SG-86 are potential source areas which are not included in TW's waste-unit characterization. MW-2 is the only monitoring well downgradient from Pit 3, and the highest concentrations of hazardous constituents in ground water at this site have been detected in this well. Based on direction of ground water flow, pits 1 and 2 are probably not the source areas for the constituents detected within MW-2. The presence of 1,1,1 TCA and 1,1 DCA in ground water at this location of MW-2 casts doubt on the knowledge of the past waste management practices and therefore the knowledge of process surrounding the solvent use and disposal issues at this facility.
  
- 4) Lastly, unlike total petroleum hydrocarbon (TPH) ground water plumes, solvent or chlorinated hydrocarbon plumes tend to migrate appreciable distances from source areas due to the nature of the constituents. This has been shown at several solvent plumes through the State of New Mexico (PNM Person Station, Sparton Technology in Albuquerque, and Walker Air Force Base in Roswell). As TW states on Page 4, par.4, "thus remediation efforts at this site will focus almost exclusively on the reduction of ..TPH.. and BTEX compounds.. present in the soil and ground water. " This is of concern because TW repeatedly states in the October 11, 1995 submittal that the Oil Conservation District (OCD) is the most appropriate regulatory oversight agency because of their expertise with delineation and remediation of TPH plumes. OCD typically does not oversee solvent plume characterization and cleanup at hazardous waste sites and may not focus on the RCRA concerns of the dissolved phase solvent plume.

cc: Benito Garcia, HRMB Bureau Chief  
Barbara Hoditschek, Program Manager  
Susan McMichael, NMED legal