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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 26, 2017

Ms. Stacy Boultinghouse, PG
Environmental Manager
Transwestern Pipeline Company, LLC
1300 Main Street
Houston, TX 77002

**RE: DISAPPROVAL
REVISED OPERATION AND MAINTENANCE AND MONITORING (O&MM)
PLAN FOR THE FORMER SURFACE IMPOUNDMENTS ANNUAL REPORT
ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY, LLC
ROSWELL, CHAVES COUNTY, NEW MEXICO
NMOCD CASE #GW-052/EPA ID NO. NMD986676955
HWB-TWP-17-002**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Revised Operation and Maintenance and Monitoring (O&MM) Plan for the Former Surface Impoundments Annual Report, Roswell Compressor Station No.9* (Report), dated May 26, 2017 submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Disapproval. The Respondent must address the following comments provided by both NMED and the New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division (OCD):

Comment 1

In Section 3.1, Overall System Operation, page 2, the Respondent states, “[t]he MPE remediation system operation will be optimized in a manner to maximize contaminant removal while minimizing the length of the remediation process.” The monitoring items 1.19 (measurement of the air flow rate of each operating well), 1.20 (measurement of the vacuum of each operating well), and 1.21 (measurement of vapor concentration of each operating well) listed in **Table 4.1-1** (SVE System Monitoring Schedule) are critical components to evaluate the system performance and optimization. However, it is not clear how these monitoring parameters are collected. **Figure 4** (PROCESS AND INSTRUMENTATION DIAGRAM FOR SOIL VAPOR EXTRACTION AND TREATMENT SYSTEM) does not show the location of gauges, meters, and/or ports. Explain how these monitoring parameters are collected in the revised Report, and update **Figure 4** to include the details related to the data collection. If applicable, modify the SVE well manifold legs to acquire flowrate, vacuum and PID readings for each operating vapor extraction well for data collection.

Comment 2

In Section 3.2, Soil Vapor Extraction and Treatment System, pages 2 and 3, the Respondent states, “[t]he thermal oxidizer is equipped with a 10-horse power (hp) PD blower capable of 200 cfm at 4 inches of mercury (“Hg), a 12 gallon KO pot with drain ports, air filters, a chart recorder, interlocking controllers and air flow and pressure gauges.” There is a discrepancy on the size of the blower. According to **Figure 4**, each thermal oxidizer appears to be equipped with a 150-horse power blower. Additionally, previous documentation (Final Remediation Design – October 2002) suggests that two thermal oxidizers were operated with a 5-horse power blower. Revise the Report to address these discrepancies. If the current SVE configuration is operated by a 5-horse power blower, the blower may be underpowered. The Respondent must determine whether the blower is appropriate for the current SVE configuration. Provide a friction loss calculation for the system (using the specification of the actual blower(s)) as an appendix in the revised Report.

Comment 3

In Section 3.3, Groundwater Extraction and Treatment System, page 3, the Respondent states, “[e]missions from air stripper are treated by two 400 pound vapor-phase granular activated carbon (GAC) vessels prior to discharge to the atmosphere. Once treated, groundwater is pumped by a 1-hp transfer pump through a 10 micron bag filter and two 400 pound liquid-phase GAC vessels and stored in a 1,000 gallon aboveground irrigation water tank.” The monitoring items 2.13 through 2.15 (vapor concentration measurements) and 2.32 through 2.34 (liquid concentration measurements) listed in **Table 4.1-2** (Groundwater Extraction System Monitoring Schedule) will determine the timing of VOC breakthrough from the GAC vessels. Discuss in the revised Report whether the carbon is either replaced with fresh or virgin carbon, or removed, reactivated at high temperatures and returned to the vessel when the GAC is exhausted and VOCs are beginning to break through.

Comment 4

In Section 3.4, Automated Logic Control Description, page 6, the description of “Deactivation of Air Compressor” is repeated twice, once in Step 2 and again in Step 4 in the shutdown sequence. Clarify whether it is a typographical error and revise; otherwise, distinguish one deactivation from the other in the revised Report.

Comment 5

In Section 4.1, System Monitoring, page 7, the Respondent states, “[t]he system monitoring activities will be documented on the field forms provided in **Attachment A.**” Multiple monitoring, inspection and maintenance items (e.g., item 1.19 - measurement of the air flow rate of each operating well) in **Table 4.1-1, 4.1-2** (Groundwater Sampling and Analysis Plan), and **5-1** (General Maintenance) are not addressed on the field forms in **Attachment A.** The field forms must be revised to address all monitoring, inspection and maintenance items listed in **Table 4.1-1, 4.1-2** and **5-1.** Additionally, provide more detailed descriptions of the items listed in **Table 4.1-1, 4.1-2** and **5-1.** For instance, maintenance item 3.11 in **Table 5-1** describes “check and tighten fittings”; however, a description of the equipment that is being checked and tightened is not provided.

Comment 6

Pages 9 and 10, **Table 4.2-1** (Groundwater Sampling and Analysis Plan) describes the proposed groundwater sampling and analysis plan for each monitoring well. The following changes are proposed from the previous sampling and analysis plan:

- The monitoring wells where sampling frequency is proposed to be reduced from semiannually to annually: Ten (10) wells (MW-16, MW-20, MW-26, MW-29, MW-32, MW-34, MW-35, MW-37, MW-39, and MW-40)
- The monitoring well where sampling frequency is proposed to be increased from annually to semiannually: One (1) well (MW-21)
- The monitoring wells where sampling frequency is unchanged: Seven (7) wells (MW-13, MW-14, MW-22, MW-24D, MW-27, MW-41, and MW-42)

As the operating components of the MPE remediation system may be manipulated periodically to optimize recovery system efforts, the contaminants may become more mobile and the subsurface conditions may become more unpredictable; thus, NMED does not approve of reducing the current sampling frequency for any monitoring wells except for wells MW-32, MW-35, and MW-37. The proposed changes are approved for MW-32, MW-35, and MW-37. Provide a table showing the updated sampling and analysis plan in the revised Report.

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Comment 7

The sample ports for the post-treatment, between GACs, post-air stripper, and pre-treatment in the water treatment system are missing on **Figure 5** (PROCESS AND INSTRUMENTATION DIAGRAM FOR GROUNDWATER EXTRACTION AND TREATMENT SYSTEM). Revise the Report to include these sample ports.

Comment 8

Chlorinated solvents are known to undergo dechlorination under anaerobic condition and the accumulation of vinyl chloride may be occurring at the site. Include the analytical result of vinyl chloride for the samples collected from the wells MW-20, MW-22, MW-26, MW-39, MW-40, MW-41 and MW-42 in future annual monitoring Reports. Update the groundwater sampling and analysis plan in the revised Report.

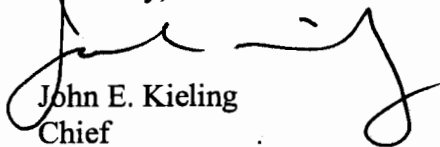
Comment 9

The analytical data packages have not been submitted with previous annual monitoring Reports. Refer to Section VII.D.5 of the Stipulated Final Order for the reporting requirement of laboratory deliverables. Include the analytical data packages as specified in Section VII.D.5 of the Stipulated Final Order in future annual monitoring reports.

The Respondent must address all comments in this Disapproval and submit a revised Report. Two hard copies and an electronic version must be submitted to NMED. Include a red-line strikeout version in electronic format showing where all revisions have been made. The revised Report must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The revised Report must be submitted to NMED no later than **September 30, 2017**.

If you have questions regarding this Disapproval, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



John E. Kielling
Chief

Hazardous Waste Bureau

cc: D. Cobrain NMED HWB
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File: TWP 17-002 and Reading, 2017