



NEW MEXICO
ENVIRONMENT DEPARTMENT



ENTERED



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 30, 2019

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

**RE: SECOND RESPONSE TO COMMENTS
2017 ANNUAL REPORT
ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
NMOCD #GW-052
HWB-TWP-18-001**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has received the *Second Response to Comments 2017 Annual Report, Roswell Compressor Station No.9* (Response Letter), dated January 2, 2019 submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED has reviewed the Response Letter. The Respondent must address the following comments.

Comment 1

The response to NMED’s Comment 4 states, “[u]pon further consideration, Transwestern withdraws the idea that short-circuiting may be contributed by the nearby pipelines. Transwestern further evaluated the subsurface conditions with personnel that was on-site during the abandonment of MPE-1 through MPE-6 in Circuit A. Based on field data and personnel observation, the geology in the area of MPE-1 and MPE-6 includes large cobbles rather than finer sands at depths.” Provide a reference to the document that includes the field data associated with abandonment of the wells and the description of the subsurface conditions in the

vicinity of Circuits A, C, and D. If the document was not previously submitted to NMED, submit the relevant document(s) no later than **March 1, 2019**.

Comment 2

In the response to NMED's Comment 5, the Respondent states, "Transwestern does not agree with NMED's assessment that vapor or groundwater migration is a concern at this site. The plume has shrunk since beginning operation of the multiphase extraction system to the extent that six MPE wells were allowed to be plugged and abandoned by the agency. Available evidence from the MPE system vapor results indicate that more, rather than the same or less, soil vapor is being recovered in the optimized configuration. Even if there was some additional vapor migration, it would unlikely be to the extent exhibited by the initial plume." The statement does not address the issue of extracting vapor from Circuit D and suspending extraction from other circuits. The current status of the vapor plume may be sustained by the current configuration of the remediation system. The suspension of vapor extraction from Circuits A, B, and C may potentially allow the plume to expand as stated by NMED's previous comments. Unless the "lack of power condition" is resolved, the proposed optimization for isolating Circuit D cannot be approved.

Comment 3

The response to NMED's Comment 5 also states, "[t]here are no inhabited buildings other than the remedial system equipment shed (metal building with one man-door and one large roll up door) in close proximity to the plume, nor are there any buildings on the state land that may represent a potential vapor intrusion risk." The Respondent discusses vapor intrusion risk in the vicinity of the plume. Although there are no inhabited buildings in the vicinity of the plume at this time, the potential must be addressed. Note that a significant volume of phase separated hydrocarbons (PSH) remains at the site. Unless the issue of potential vapor expansion is addressed, the plume may potentially expand due to the presence of PSH. Whether future residents are likely to reside in the area or not, the Respondent must address the issue of potential vapor expansion induced by the system optimization.

Comment 4

The response to NMED's Comment 5 also states, "[f]inally, in Section 8.5 of the approved May 2013 Amended Remediation Work Plan, Transwestern clearly notes that it will take steps to optimize system operation by taking steps like those described in the 2017 Annual Report. Transwestern plans to continue to operate this system according to the approved RWP and report the results on an annual basis." The May 2013 work plan states, "[r]emedial efforts in the Project Area will be implemented in a continuous improvement approach designed to optimize the removal of PSH to the extent practicable." The continuous improvement approach (optimization) is permitted when proposed optimization does not potentially degrade current site conditions. Although the proposed optimization (isolation of Circuit D) may potentially improve the effectiveness of the systems, it could also result in a vapor plume expansion. Therefore, the proposed optimization cannot be approved. In addition, the Respondent must propose a work

plan to optimize the system and the work plan must be approved before implementing optimization efforts in the future. The Respondent must not implement optimization efforts without the concurrence of NMED.

Comment 5

The response to NMED's Comment 5 also states, "[t]he current operating equipment and existing remediation activities continue to meet the purpose of the Order (Section III.A)." If the Respondent still wishes to implement the proposed optimization, the Respondent must demonstrate that the optimization will not cause an expansion of the vapor plume; otherwise, propose to submit a work plan to upgrade the system as required by Comment 9 in the May 1, 2018 *Approval with Modifications*. If the Respondent elects to upgrade the system, submit the work plan no later than **April 26, 2019**. If the Respondent does not wish to implement the proposed optimization, current configuration of the system must be maintained; in this case, no response to this comment is required.

Comment 6

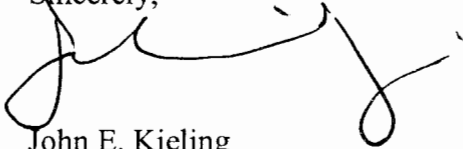
In the response to NMED's Comment 6, the Respondent states, "Transwestern will sample the wells in accordance with the procedures in the current Operation, Maintenance and Monitoring (OMM) Plan but recommends evaluating the data from the two events to determine whether a revised OMM Plan will be necessary." To reiterate, since the OMM Plan will be revised as required by Comment 6 in the NMED's August 17, 2018 letter, the Respondent must submit the OMM Plan that includes the updates no later than **May 31, 2019**.

The Respondent must address all comments contained in this letter in a response letter. The response letter must be submitted to NMED no later than **April 5, 2019**.

Ms. Boultinghouse
January 30, 2019
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large loop at the end.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain NMED HWB
K. Van Horn NMED HWB
M. Suzuki NMED HWB
J. Griswold, NMOCD
B. Billings, NMOCD
T. Gum, NMOCD
L. King, USEPA, Region 6

File: TWP-18-001 and Reading, 2019
NMOCD Administration Record, GW-052/AP-125