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TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company

RECEIVED
AUG 30 2019
NMED
Hazardous Waste Bureau

August 28, 2019

Mr. John Kieling
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

RE: Response to Approval with Modifications Comments
Revised Operation, Maintenance, & Monitoring Plan
Roswell Compressor Station No. 9
Transwestern Pipeline Company
Roswell, Chaves County, New Mexico
NMOCD Abatement Plan #AP-125 (Formerly #GW-052)
EPA ID No. NMD986676955
HWB-TWP-19-002

Dear Mr. Kieling;

Transwestern Pipeline, LLC (Transwestern) is pleased to submit this *Response to Comments* (RTC) pertaining to the June 27, 2019 *Approval with Modifications* issued by the New Mexico Environment Department (NMED). These comments were developed by NMED and the New Mexico Oil Control Division (NMOCD) pertaining to a *Revised Operation, Maintenance and Monitoring Plan* (OM&M Plan) submitted by Transwestern on May 22, 2019.

To respond specifically to each of the Agencies' comments, the original comment included within the NMED letter is in **bold**, with the Transwestern response included in plain text immediately following the item requiring a response.

Comment 1

In Section 3.3, Groundwater Extraction and Treatment System, the Respondent states, "[o]nce fluids reach a certain level in the holding tanks, ¾ hp centrifugal transfer pumps deliver the recovered fluids to a 90-barrel (approximately 2,800 gallons) aboveground storage tank that serves as surge tank and separation unit of PSH and groundwater." Figure 5, Process and Instrumentation Diagram for Groundwater Extraction and Treatment System shows the size of the surge tank as 210-barrel. Resolve the discrepancy and provide a replacement page or a revised figure.

The size of the surge tank is 210 barrel. ***Attachment A*** includes the replacement pages (clean copies and redlined pages).

Comment 2

In Section 3.3, Groundwater Extraction and Treatment System, the Respondent states, "[s]eparated PSH in the surge tank is removed manually and sent offsite to a permitted

facility for recycling." The volume of PSH accumulated in the surge tank was discussed in the Report of 2018 Groundwater Remediation Activities (Report), dated March 29, 2019. However, a table that presents historic measurement of PSH volume is not provided in the Report. The table is necessary to evaluate increasing or decreasing trends related to recovered PSH volumes. Include the table in future reports. In addition, although the Respondent states that the PSH is removed manually, a description of the collection method (e.g., skimmer pump or vacuum truck, frequency of PSH monitoring/collection) is not discussed in the Plan. Provide the information in future reports.

Comment noted. A description of the PSH collection method, as well as a table providing historical PSH volumes, will be provided in future reports.

Comment 3

In Section 3.3, Groundwater Extraction and Treatment System, the Respondent states, "[e]missions from the air stripper are treated by two 400 pound vapor-phase granular activated carbon (GAC) vessels prior to discharge to the atmosphere." Attachment A, Groundwater System Monitoring Data Sheet and Table 4.1-2, Groundwater Extraction System Monitoring Schedule include a provision for vapor concentration measurement of the GAC vessels on a bimonthly basis. However, the data collected was not provided in the Report. The data must be reported in the future reports because it is useful to evaluate the operating conditions and efficiency of GAC vessels.

Comment noted. Bimonthly vapor concentration measurements of the GAC vessels will be included in future reports.

Comment 4

In Section 3.3, Groundwater Extraction and Treatment System, the Respondent states, "[a]fter reaching a certain level in the tank, the treated water is transferred by a 1-hp centrifugal pump through a 10 micron bag filter and disperses the water through an irrigation system consisting of above ground spray nozzles." Provide information regarding the location where the treated water is discharged by the irrigation system in the response letter. Provide a map that shows the location of the irrigation system.

Treated water is discharged by the irrigation system to the west of MW-15 and MW-17, approximately 200 feet from the eastern edge of the Site. ***Attachment B*** includes a map indicating the location and design of the irrigation system, as well as an aerial image of the irrigation area.

Comment 5

In Section 4.1, System Monitoring, the Respondent states, "[t]he remediation system shall be deactivated for 48 to 72 hours prior to the start of each sampling event." Provide a clarification whether both the Soil Vapor Extraction (SVE) and the Groundwater Extraction

and Treatment (GET) systems are deactivated. Revise the statement accordingly and provide a replacement page.

Both the SVE and GET systems are deactivated 48 to 72 hours prior to the start of each sampling event. ***Attachment C*** includes the requested replacement pages (clean copies and redlined pages).

Comment 6

Comment 7 in the April 23, 2019 *Approval with Modifications* directs the Respondent to collect groundwater samples from wells MW-10, MW-11 and MW-17 for BTEX analysis during the November 2019 sampling event and to discuss the results of the analysis in the 2019 Report and update the Sampling and Analysis Plan (SAP). However, Table 4.2-1, Groundwater Sampling and Analysis Plan does not include the provision. Revise the SAP to include the collection of groundwater samples from the wells. Provide a revised table.

Comment noted. MW-10, MW-11, and MW-17 BTEX analysis will be added to Table 4.2-1. The revised Table 4.2-1, as well as a redlined copy, is included in ***Attachment D***.

Transwestern appreciates this opportunity to continue to work with NMED and NMOCD to continue to bring this site to closure. If you have any further questions or comments regarding these responses, please do not hesitate to contact me at (210) 870-2725 or JD Haines of EarthCon Consultants, Inc. at (317) 450-6126.

Sincerely,

SBoultinghouse

Ms. Stacy Boultinghouse, PG
Environmental Manager
Transwestern Pipeline Company, LLC
Stacy.Boultinghouse@energytransfer.com

Cc: M. Suzuki, NMED HWB
K. Van Horn, NMED HWB
J. Griswold, NMOCD
B. Billings, NMOCD
T. Gum, NMOCD
L. King, USEPA Region 6
JD Haines, EarthCon
S. Diamond, EarthCon

ATTACHMENT A

210-barrel Replacement and Redlined Pages

oxidizer is capable of processing an air flow rate of 200 scfm and treating VOC concentrations with a LEL ranging between 50% and 60% in thermal mode. The 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. Natural gas combined with the influent VOC vapor stream extracted from wells is used to supply fuel to the thermal oxidizer for achieving operating temperature of greater than 1,450 degree Fahrenheit (°F) in the combustion chamber. The thermal oxidizer is capable of operating in catalytic mode to reduce supplemental fuel usage if equipped with catalytic blocks and concentrations are less than 20% LEL.

3.3 Groundwater Extraction and Treatment System

The GET system can handle a water flow rate of 20 gallons per minute (gpm). Groundwater and PSH are recovered by operating pneumatic pumps installed in MPE wells. The MPE wells are connected into four groups, which are labeled as Circuit A, Circuit B, Circuit C, and Circuit D. At each circuit, the recovered fluids are conveyed from pneumatic pumps through a common manifold and deposited in a 200-gallon holding tank. A 15-hp rotary screw air compressor rated for 67 cfm at 100 pounds per square inch (psi) is used to supply compressed air to the pneumatic pumps and the knock-out tank diaphragm pump for the SVE system. Once fluids reach a certain level in the holding tanks, ¾ hp centrifugal transfer pumps deliver the recovered fluids to a 210-barrel aboveground storage tank that serves as surge tank and separation unit of PSH and groundwater. Separated PSH in the surge tank is removed manually and sent off-site to a permitted facility for recycling. Separated groundwater is transferred by gravity from the surge tank to a 325 gallon equalization tank and a 100 gallon holding tank that are connected in series. From the holding tank, a 1-hp centrifugal pump is used to process separated groundwater to the air stripper. The air stripper is equipped with a 3-hp regenerative blower to move air within the 7-tray stripper tower for volatilizing hydrocarbons in groundwater. Emissions from the 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. After reaching a certain level in the tank, the treated water is transferred by a 1-hp centrifugal pump through a 10 micron bag filter and disperses the water through an irrigation system consisting of above ground spray nozzles.

Table 3.3-1: Relay Control Systems for the SVE System			
Component	**Devices**	**Condition**	**Response**
12-gal KO POT	Liquid level switches	High-high water level	Deactivate SVE blower and Thermal Oxidizer
Thermal Oxidizer	Temperature Transducer	High temperature	Deactivate SVE blower and Thermal Oxidizer
			Closes Supply Gas valve
			Open Dilution Valve
Thermal Oxidizer	LEL Transducer	High LEL concentration	Deactivate SVE blower and Thermal Oxidizer
			Closes Supply Gas valve
			Open Dilution Valve
Combustion Blower	Actuated Valve	Startup and Reset	Activate Combustion Blower

Groundwater Extraction and Treatment System:

The GET system is integrated using electrical relays, actuated valves, pressure sensors, and levels switches. The following table includes a list of relay control sequences for automatic operation and deactivation of the GET system:

Table 3.3-2: Relay Control Systems for the Groundwater Extraction System			
Component	**Devices**	**Condition**	**Response**
200-gallon Holding Tanks	Liquid level switches	High-high water level	Close air supply line by pressure switch valve for Circuit
		High water level	Activate transfer pump for Circuit
		Low water level	Deactivate transfer pump for Circuit
210-Barrel Surge Tank	Liquid level switches	High-high water level	Closes air supply line actuated valves for all Circuits
100-gallon Transfer Tank	Liquid level switches	High water level	Activate transfer pump for tank
		Low water level	Deactivate transfer pump for tank
Air Stripper	Liquid level switches Blower pressure switch	High-high water level	Close pneumatic actuated valve of surge tank effluent line
		High water level	Activate transfer pump for air stripper
		Low water level	Deactivate transfer pump for air stripper
		Low air pressure	Close pneumatic actuated valve of surge tank effluent line

oxidizer is capable of processing an air flow rate of 200 scfm and treating VOC concentrations with a LEL ranging between 50% and 60% in thermal mode. The 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. Natural gas combined with the influent VOC vapor stream extracted from wells is used to supply fuel to the thermal oxidizer for achieving operating temperature of greater than 1,450 degree Fahrenheit (°F) in the combustion chamber. The thermal oxidizer is capable of operating in catalytic mode to reduce supplemental fuel usage if equipped with catalytic blocks and concentrations are less than 20% LEL.

3.3 Groundwater Extraction and Treatment System

The GET system can handle a water flow rate of 20 gallons per minute (gpm). Groundwater and PSH are recovered by operating pneumatic pumps installed in MPE wells. The MPE wells are connected into four groups, which are labeled as Circuit A, Circuit B, Circuit C, and Circuit D. At each circuit, the recovered fluids are conveyed from pneumatic pumps through a common manifold and deposited in a 200-gallon holding tank. A 15-hp rotary screw air compressor rated for 67 cfm at 100 pounds per square inch (psi) is used to supply compressed air to the pneumatic pumps and the knock-out tank diaphragm pump for the SVE system. Once fluids reach a certain level in the holding tanks, ¾ hp centrifugal transfer pumps deliver the recovered fluids to a ~~90-barrel~~ 210-barrel ~~(approximately 2,800 gallons)~~ aboveground storage tank that serves as surge tank and separation unit of PSH and groundwater. Separated PSH in the surge tank is removed manually and sent off-site to a permitted facility for recycling. Separated groundwater is transferred by gravity from the surge tank to a 325 gallon equalization tank and a 100 gallon holding tank that are connected in series. From the holding tank, a 1-hp centrifugal pump is used to process separated groundwater to the air stripper. The air stripper is equipped with a 3-hp regenerative blower to move air within the 7-tray stripper tower for volatilizing hydrocarbons in groundwater. Emissions from the 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. After reaching a certain level in the tank, the treated water is transferred by a 1-hp centrifugal pump through a 10 micron bag filter and disperses the water through an irrigation system consisting of above ground spray nozzles.

Table 3.3-1: Relay Control Systems for the SVE System			
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			Closes Supply Gas valve
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Thermal Oxidizer	LEL Transducer	High LEL concentration	Deactivate SVE blower and Thermal Oxidizer
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			Open Dilution Valve
Combustion Blower	Actuated Valve	Startup and Reset	Activate Combustion Blower

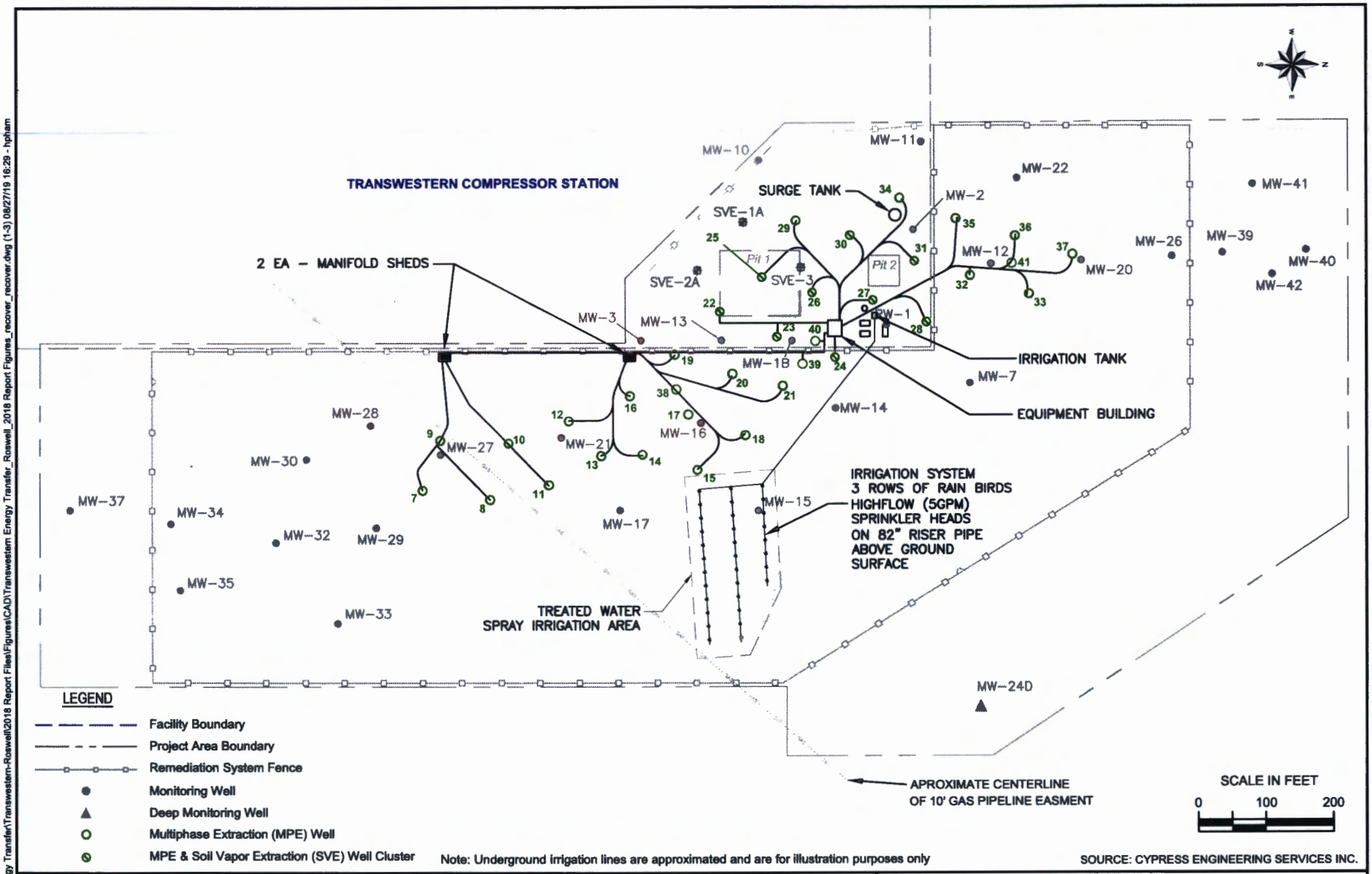
Groundwater Extraction and Treatment System:

The GET system is integrated using electrical relays, actuated valves, pressure sensors, and levels switches. The following table includes a list of relay control sequences for automatic operation and deactivation of the GET system:

Table 3.3-2: Relay Control Systems for the Groundwater Extraction System			
Component	**Devices**	**Condition**	**Response**
200-gallon Holding Tanks	Liquid level switches	High-high water level	Close air supply line by pressure switch valve for Circuit
		High water level	Activate transfer pump for Circuit
		Low water level	Deactivate transfer pump for Circuit
~~90~~210-Barrel Surge Tank	Liquid level switches	High-high water level	Closes air supply line actuated valves for all Circuits
100-gallon Transfer Tank	Liquid level switches	High water level	Activate transfer pump for tank
		Low water level	Deactivate transfer pump for tank
Air Stripper	Liquid level switches Blower pressure switch	High-high water level	Close pneumatic actuated valve of surge tank effluent line
		High water level	Activate transfer pump for air stripper
		Low water level	Deactivate transfer pump for air stripper
		Low air pressure	Close pneumatic actuated valve of surge tank effluent line

ATTACHMENT B

Irrigation System Map and Aerial Image



Note: Underground irrigation lines are approximated and are for illustration purposes only

SOURCE: CYPRESS ENGINEERING SERVICES INC.

TRANSWESTERN PIPELINE COMPANY, LLC TRANSWESTERN
COMPRESSOR STATION No. 9
(ROSWELL COMPRESSOR STATION)
ROSWELL, CHAVES COUNTY, NEW MEXICO

PROJECT NO. 02.20180005.00

EARTHCON®

EarthCon Consultants, Inc.

1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

REMEDIATION SYSTEM LAYOUT

DRAWN:	CHECKED:	DATE:
HVP	JLF	08/27/19

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TRANSWESTERN PIPELINE COMPANY, LLC TRANSWESTERN
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1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

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IRRIGATION AREA

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ATTACHMENT C

SVE/GET Replacement and Redlined Pages

Table 4.2-1: Groundwater Sampling and Analysis Plan		
Well ID	**1st Semiannual Event Analytical Parameters**	**2nd Semiannual Event Analytical Parameters**
RW-1	VOCs	VOCs

Notes:
1. BTEX – benzene, toluene, ethylbenzene, xylenes
2. VOCs – volatile organic compounds
3. BTEX and VOCs will be analyzed by EPA method 8260

The remediation system (including GET and SVE systems) shall be deactivated for 48 to 72 hours prior to the start of each sampling event. Depth to PSH, if present, and depth to groundwater will be measured in each groundwater monitoring well, MPE well, recovery well, and SVE well using an optical sensor probe capable of distinguishing between PSH and groundwater prior to purging and sampling activities. Fluid measurements should be completed within 48 hours.

Prior to sampling, the monitoring, recovery, and SVE wells will be purged and monitored for stabilization of water quality parameters, including pH, specific conductance, dissolved oxygen (DO), oxidation-reduction potential (ORP), and temperature using a calibrated YSI 556 Meter, or equivalent. Purging will be considered complete when the measured parameters of the purge water stabilize to within 10 percent for three consecutive measurements. In addition to the samples collected from the monitoring, recovery, and SVE wells, the following data quality control samples will be collected and analyzed for either BTEX or VOCs, as required: field duplicates, field blanks, equipment rinsate blanks. The groundwater monitoring data will be summarized in an annual monitoring report, which will be submitted to NMED by March 31 of the following year.

5.0 MAINTENANCE

Routine maintenance will be conducted while operating the system to minimize excessive wear and major failures of equipment components. Maintenance requirements for specific equipment components is provided in the technical operation and maintenance manuals provided by the OEM. Only trained personnel should be maintaining the system. General maintenance activities for the SVE system and GET system equipment components are provided in the following table:

Table 5-1: General Maintenance		
Item	**Description**	**Freq.**
3.1	Grease bearings on vacuum blower	Monthly

Table 5-1: General Maintenance		
Item	**Description**	**Freq.**
3.2	Replace Oil	Every 6 mos.
3.3	Clean and/or replace KO pot air filter	Every 6 mos.
3.4	Clean and/or replace vacuum blower air filter	Every 6 mos.
3.5	Replace vacuum blower belts	Every 6 mos.
3.6	Replace bag filters	Weekly
3.7	Check air compressor belt tension	Weekly
3.8	Check air compressor inlet filter element	Weekly
3.9	Change air compressor filter	Every 6 mos.
3.10	Change air compressor lubricant filter	Every 6 mos.
3.11	Check and tighten fittings	Weekly
3.12	Clean check valves	Every 6 mos.
3.13	Clean air stripper trays	Every 6 mos.
3.14	Clean air stripper rotameter	Monthly

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3.12	Clean check valves	Every 6 mos.
3.13	Clean air stripper trays	Every 6 mos.
3.14	Clean air stripper rotameter	Monthly

ATTACHMENT D

Table 4.2-1 Replacement and Redlined Pages

Table 4.1-2: Groundwater Extraction System Monitoring Schedule		
Item	**Description**	**Freq.**
Equipment Inspections		
2.18	Inspect and record the condition of air stripper rotameter.	Daily
2.19	Inspect and record condition of 200 gallon holding tanks (Circuit A, B, C, and D).	Daily
2.20	Inspect and record condition of 325 gallon equalization tank and 100 gallon holding tank.	Daily
2.21	Inspect and record the condition of air flow, and pressure gauges.	Daily
2.22	Inspect and record the condition of bag filters.	Daily
2.23	Inspect and record the condition of water meter.	Daily
2.24	Inspect air compressor for air leaks.	Daily
2.25	Inspect and record air compressor oil level in site tube.	Daily
2.26	Inspect air compressor oil return line.	Daily
2.27	Drain air receiver and condensate from air compressor filter separator.	Daily
2.28	Inspect for water leaks.	Daily
2.29	Inspect bag filters and replace as needed.	Daily
2.30	Inspect sprinkler heads on the irrigation system.	Daily
2.31	Inspect pneumatic pumps.	As needed
Sampling		
2.32	Collect influent water sample prior to air stripper	Monthly
2.33	Collect effluent water sample after air stripper	Monthly
2.34	Collect effluent water sample after liquid-phase carbon vessels	Monthly

4.2 Groundwater Monitoring

Groundwater sampling will be conducted semi-annually in accordance with the SO and the Stage 2 AP to monitor system effectiveness and the extent of the plume. The groundwater monitoring network at the Site consists of thirty monitoring wells. Eighteen of these wells are included in the sampling and analysis plan (SAP), which lists the sampling frequency and laboratory analytical results for each monitoring well. In addition to monitoring wells, the recovery well (RW-1) and all 14 SVE wells are sampled and analyzed for VOCs. The SAP is summarized in the following table:

Table 4.2-1: Groundwater Sampling and Analysis Plan		
Well ID	**1st Semiannual Event Analytical Parameters**	**2nd Semiannual Event Analytical Parameters**
MW-10	--	BTEX
MW-11	--	BTEX

Table 4.2-1: Groundwater Sampling and Analysis Plan		
Well ID	**1st Semiannual Event Analytical Parameters**	**2nd Semiannual Event Analytical Parameters**
MW-13	--	BTEX
MW-14	--	BTEX
MW-16	BTEX	BTEX
MW-17	--	BTEX
MW-20	VOCs	VOCs
MW-21	BTEX	BTEX
MW-22	VOCs	VOCs
MW-24D	--	BTEX
MW-26	VOCs	VOCs
MW-27	BTEX	BTEX
MW-29	BTEX	BTEX
MW-32	--	BTEX
MW-34	BTEX	BTEX
MW-35	--	BTEX
MW-37	--	BTEX
MW-39	VOCs	VOCs
MW-40	VOCs	VOCs
MW-41	VOCs	VOCs
MW-42	VOCs	VOCs
SVE-1A	VOCs	VOCs
SVE-2A	VOCs	VOCs
SVE-3	VOCs	VOCs
SVE-22	VOCs	VOCs
SVE-23	VOCs	VOCs
SVE-24	VOCs	VOCs
SVE-25	VOCs	VOCs
SVE-26	VOCs	VOCs
SVE-27	VOCs	VOCs
SVE-28	VOCs	VOCs
SVE-30	VOCs	VOCs
SVE-31	VOCs	VOCs

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2.19	Inspect and record condition of 200 gallon holding tanks (Circuit A, B, C, and D).	Daily
2.20	Inspect and record condition of 325 gallon equalization tank and 100 gallon holding tank.	Daily
2.21	Inspect and record the condition of air flow, and pressure gauges.	Daily
2.22	Inspect and record the condition of bag filters.	Daily
2.23	Inspect and record the condition of water meter.	Daily
2.24	Inspect air compressor for air leaks.	Daily
2.25	Inspect and record air compressor oil level in site tube.	Daily
2.26	Inspect air compressor oil return line.	Daily
2.27	Drain air receiver and condensate from air compressor filter separator.	Daily
2.28	Inspect for water leaks.	Daily
2.29	Inspect bag filters and replace as needed.	Daily
2.30	Inspect sprinkler heads on the irrigation system.	Daily
2.31	Inspect pneumatic pumps.	As needed
Sampling		
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4.2 Groundwater Monitoring

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MW-26	VOCs	VOCs
MW-27	BTEX	BTEX
MW-29	BTEX	BTEX
MW-32	--	BTEX
MW-34	BTEX	BTEX
MW-35	--	BTEX
MW-37	--	BTEX
MW-39	VOCs	VOCs
MW-40	VOCs	VOCs
MW-41	VOCs	VOCs
MW-42	VOCs	VOCs
SVE-1A	VOCs	VOCs
SVE-2A	VOCs	VOCs
SVE-3	VOCs	VOCs
SVE-22	VOCs	VOCs
SVE-23	VOCs	VOCs
SVE-24	VOCs	VOCs
SVE-25	VOCs	VOCs
SVE-26	VOCs	VOCs
SVE-27	VOCs	VOCs
SVE-28	VOCs	VOCs
SVE-30	VOCs	VOCs
SVE-31	VOCs	VOCs

Table 4.2-1: Groundwater Sampling and Analysis Plan		
Well ID	**1st Semiannual Event Analytical Parameters**	**2nd Semiannual Event Analytical Parameters**
RW-1	VOCs	VOCs

Notes:
1. BTEX – benzene, toluene, ethylbenzene, xylenes
2. VOCs – volatile organic compounds
3. BTEX and VOCs will be analyzed by EPA method 8260

The remediation system (including GET and SVE systems) shall be deactivated for 48 to 72 hours prior to the start of each sampling event. Depth to PSH, if present, and depth to groundwater will be measured in each groundwater monitoring well, MPE well, recovery well, and SVE well using an optical sensor probe capable of distinguishing between PSH and groundwater prior to purging and sampling activities. Fluid measurements should be completed within 48 hours.

Prior to sampling, the monitoring, recovery, and SVE wells will be purged and monitored for stabilization of water quality parameters, including pH, specific conductance, dissolved oxygen (DO), oxidation-reduction potential (ORP), and temperature using a calibrated YSI 556 Meter, or equivalent. Purging will be considered complete when the measured parameters of the purge water stabilize to within 10 percent for three consecutive measurements. In addition to the samples collected from the monitoring, recovery, and SVE wells, the following data quality control samples will be collected and analyzed for either BTEX or VOCs, as required: field duplicates, field blanks, equipment rinsate blanks. The groundwater monitoring data will be summarized in an annual monitoring report, which will be submitted to NMED by March 31 of the following year.

5.0 MAINTENANCE

Routine maintenance will be conducted while operating the system to minimize excessive wear and major failures of equipment components. Maintenance requirements for specific equipment components is provided in the technical operation and maintenance manuals provided by the OEM. Only trained personnel should be maintaining the system. General maintenance activities for the SVE system and GET system equipment components are provided in the following table:

Table 5-1: General Maintenance		
Item	**Description**	**Freq.**
3.1	Grease bearings on vacuum blower	Monthly