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NEW MEXICO
ENVIRONMENT DEPARTMENT



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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 25, 2020

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

**RE: APPROVAL WITH MODIFICATIONS
RESPONSE TO COMMENTS 10-14-2020
REPORT OF 2019 GROUNDWATER REMEDIATION ACTIVITIES
FORMER SURFACE IMPOUNDMENTS
TRANSWESTERN COMPRESSOR STATION NO.9
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-20-001**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Response to Comments 10-14-2020 Report of 2019 Groundwater Remediation Activities Former Surface Impoundments Transwestern Compressor Station No.9* (Response), dated October 14, 2020, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Approval with Modifications with the attached comments.

The Respondent must address all comments in the attachment and submit a response letter no later than **March 31, 2021**.

Ms. Boultinghouse
RTC 10-14-2020 GW Remediation Activities
Page 2

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have questions regarding this Approval with Modifications, please contact Michiya Suzuki of my staff at 505-476-6046.

Sincerely,

**Kevin
Pierard**

Digitally signed by
Kevin Pierard
Date: 2020.11.25
09:41:00 -07'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
M. Bratcher, NMOCD
L. King, EPA Region 6 (6LCRRC)

File: TWP-20-001 and Reading 2020
NMOCD Administration Record, AP-125

Attachment

Comment 1

The response to NMED's *Approval with Modifications* Comment 7 states, "[a]ccording to the May 2014 US EPA SAP [Sampling and Analysis Plan] Guidance, well stabilization was met." Section 3.0, *Semi-Annual Groundwater Monitoring*, page 4, was appropriately revised to include the stabilization criteria. However, the response to the comment does not indicate which sections were updated. Indicate the sections and page numbers where pertinent revisions were made to the Report in all future response letters. This comment only applies to all future responses.

Comment 2

The response to NMED's *Approval with Modifications* Comment 7 states, "[w]ater quality is considered stable if for three consecutive readings:

- Temperature range is no more than + 1C.
- pH varies by no more than 0.2 pH units; and,
- Specific conductance readings are within 10% of the average.

According to the May 2014 US EPA SAP Guidance, well stabilization was met."

The last three pH readings collected from well SVE-30 during the January 8, 2020 are reported as 4.81, 5.27, and 5.04 according to Appendix A. Some samples were collected prior to meeting the well stabilization criteria. If samples are collected without meeting the criteria, identify such samples and provide a justification for why such sampling results are acceptable in future reports.

Comment 3

The response to NMED's *Approval with Modifications* Comment 9 states, "[c]omment noted." NMED's *Approval with Modifications* Comment 9 states, "[a] hard copy of the laboratory analytical reports is not required in the future reports. Provide an electronic copy only in the future reports." However, a hard copy of the laboratory analytical reports was included in the revised Report (Attachment A). The response to NMED's *Approval with Modifications* Comment 1 states, "[d]ue to circumstances associated with COVID (2020), the availability to conduct business and allow the opportunity to bind copies was limited." If a large number of pages associated with the laboratory analytical reports was not included in the Report, the preparation of documents (e.g., copying, binding) will be possible since there will be significantly less pages.

Comment 4

The response to NMED's *Approval with Modifications* Comment 11 states, "Transwestern does not believe it is necessary to install piezometers at this time but will evaluate other options to evaluate drawdown influences from well RW-1." In a response letter, provide an explanation for why the Respondent does not believe it is necessary to install piezometers for well RW-1 since the distance between the nearest groundwater monitoring well with a comparable screened interval and well RW-1 exceeds 50 feet. In addition, explain what options other than

installation of piezometers were evaluated to assess drawdown influences from well RW-1 in the response letter.

Comment 5

The response to NMED's *Approval with Modifications* Comment 13 states, "[s]everal components of the current groundwater treatment system (equipment, piping, valves, etc.) are uncovered and exposed to the weather. Transwestern attempts to minimize long system deactivation periods..." and "[i]f the data suggest that the groundwater plume or LNAPL is moving and concentrations trends is [sic] increasing, Transwestern will evaluate measures that will allow the groundwater treatment system to operate through the winter months, minimizing deactivation periods." Whether or not LNAPL plume is expanding or constituent concentrations are increasing, the Respondent must implement measures to minimize long system deactivation periods. The Respondent must install measures to protect the groundwater treatment system from cold temperatures and minimize system deactivation periods. Provide a list of the measures that will be implemented to protect the system from cold temperature and approximate date when they will be added to the system in the response letter.

Comment 6

The response letter provides a distribution list for the document on page 8 of 4 [sic]. Remove Ms. K. Van Horn, NMED HWB and Mr. B. Billings, NMOCD from the list and add Mr. M. Bratcher, NMOCD for all future submittals.