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Certified Mail - Return Receipt Requested



September 8, 2021

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
 OPERATION, MAINTENANCE, AND MONITORING (OM&M) PLAN
 TRANSWESTERN COMPRESSOR STATION NO.9
 ROSWELL, CHAVES COUNTY, NEW MEXICO
 EPA ID NMD986676955
 HWB-TWP-21-002**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Operation, Maintenance, and Monitoring (OM&M) Plan* (Response), dated August 3, 2021, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this letter with the following comments.

Comment 1

In the response to NMED's *Approval with Modifications Comment 3*, the Respondent states, "according to U.S. Climate Data for New Mexico, the average low temperatures for January, February, March, November, and December are at or below freezing with an average snowfall between 1 to 4 inches for the aforementioned months." According to the referenced climate data for Roswell, New Mexico, the average low temperatures for March and November are recorded as 37 °F and 34 °F, respectively, which is above freezing. Therefore, the statement is not accurate. The average low and high temperatures for January, February, and December are recorded as 26 °F, 31 °F, 26 °F, and 55 °F, 61 °F, 55 °F, respectively. While the temperatures can reach below freezing in January, February, and December, freezing temperatures are unlikely to persist for extended periods sufficient to damage the remediation system because average high temperatures indicate that the temperatures rise above freezing during the daytime. Regardless, there may be a few days, if not a few weeks during the winter months, when cold weather could damage the remediation system during winter months in New Mexico. NMED

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agrees that the remedial operations may be discontinued during such cold weather periods; however, it is not necessary to continuously shut down the remedial operations from November through March. The NMED's *Approval with Modifications* Comment 3 directs the Permittee to discuss the measures to be or that have been, implemented to minimize the deactivation period in the 2022 OM&M Plan. This direction must still be addressed.

In addition, the Respondent further states, "Transwestern will install additional cold weather protection as needed to minimize downtime; however, the system may be deactivated for periods of extreme freezing conditions." An additional cold weather protection must be installed to minimize downtime, as stated. Insulating aboveground pipes may be adequate to provide cold weather protection because freezing temperatures are unlikely to persist for extended periods in Roswell, New Mexico. Groundwater temperatures are above freezing and warmer than atmospheric temperatures in winter. Regardless, the Respondent must discuss the measures to minimize downtime in the 2022 OM&M Plan.

Furthermore, the Respondent states, "[h]istorically and as noted via trends, the protective deactivation of the system during winter months has not negatively affected the overall goals of the remediation." The statement is not supported by historical data. Provide the data demonstrating that the winter deactivation period did not negatively affect the overall goals of the remediation, as necessary. NMED disagrees with the statement because the remediation system has been effectively extracting liquid and vapor phase hydrocarbons while it is in operation and a longer period of operation would likely increase the recovery volume proportionally.

Comment 2

In the response to NMED's *Approval with Modifications* Comment 5, the Respondent states, "Table 4.2-1 is meant to present the COC parameters." Table 4.2-1 is titled as "Groundwater Sampling and Analysis Plan." To clarify, Table 4.2-1 is presented to provide information regarding (1) proposed sampling frequency and (2) proposed analytes for each well in 2021. No response required.

Comment 3

In the response to NMED's *Approval with Modifications* Comment 6, the Respondent states, "[t]he reasoning stated in the report was that historical groundwater sampling data from the site indicated that constituents apart from BTEX were either: 1) not present at detectable concentrations; 2) present at detectable concentrations but below NMWQCC standards; or 3) present at background water quality concentrations." Note that volatile organic compounds (VOCs) are not naturally present in groundwater; therefore, there are no background concentrations to compare for VOCs. Even if VOCs other than BTEX have not been detected previously, it would be appropriate to evaluate and report all detected VOCs in future annual groundwater monitoring reports. Accordingly, revise Table 4.2-1 to propose to report all analytes listed in the analytical method (EPA Method 8260) for wells where only BTEX are listed

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as analytes and provide a replacement table.

The Respondent further states, "the approved continuation of sampling frequency and specific constituents of concern (COCs) remains consistent due to the long history of sampling and analytical results." Since the plumes are not stationary, current sampling frequency and required analyses for the samples must be re-evaluated frequently. The most appropriate sampling frequency and analytical suite for each well must be evaluated and proposed in annual OM&M Plan updates.

The Respondent must address all comments in this letter and submit a response letter and a replacement table no later than **October 22, 2021**.

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,



Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

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

File: TWP-20-002 and Reading 2021
NMOCD Administration Record, AP-125