

GW - 283

**INSPECTION
&
DATA**

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, December 29, 2008 4:10 PM
To: 'Savoie, Tony'
Subject: RE: Jal South GW-283
Attachments: OCD understanding of SUG responses.pdf

Mr. Savoie,

As the OCD understands your responses for this facility:

See the attached document for our understandings.

There are still 3 items open.

Please provide updates.

The OCD appreciates Southern Union Gas Services effort to adhere to its discharge plan permit.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>

From: Savoie, Tony [mailto:tony.savoie@sug.com]
Sent: Friday, November 07, 2008 8:49 AM
To: Lowe, Leonard, EMNRD
Subject: Jal South GW-283

Leonard,

I was hoping to give you the report on the 6th. during the inspections.

I hope you are able to open the PowerPoint presentation, Edward Hansen had some difficulty last week.

I will send a hard copy of photos, facility drain diagram, and response letter.

Tony

<<OCD Resonse 11-7-07.pptx>> <<Jal South CS - Containment Area Calculation Letter 101308.pdf>> <<resposne 11-7-07.docx>>

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**Southern Union Gas Services
Jal South Compressor Station
GW-283**

16. OCD inspections:

Response:

Photo 1: Inspection plug on sump containment

The plug was loosened and labeled hand tighten, inspection plug.

The sump total outside dimensions are 3 ft. diameter by 13 ft. in depth. The inner sump dimensions are approximately 2 inches less than that allowing for an air space between the outer and inner walls.

OCD * **STILL OPEN:** The OCD requested inspection records for this sump and all other sumps on at this facility please provide. The OCD considers this an unresolved item.

Photo 2-4: Lube oil on floor.

The lube oil on the floor was from a loose drain plug on the filter pot.

The plug was tightened and the area has been cleaned. The floor of the compressor engine room is designed to drain to one of 3 floor drains located between the units. These are used to collect leaks and wash down fluids around the units and drain them to the sump.

All of these drain lines were tested 3/31/08, a copy of the test procedures is in the Discharge Plan Appendix E.

OCD * **CLOSED.**

Photo 5: Containment drain port.

There was a foreman plug in the drain port beneath the sand and debris that had accumulated in the containment. This drain port is common with all of the other drain lines that were tested in 2008. SUGS will send a facility diagram identifying the drain ports and lines.

OCD * **STILL OPEN:** still open until the OCD receives and reviews facility diagram.

Photo 6-9: Large tank containment area.

The containment area was cleaned on 10/7/08. During the cleaning event it was discovered that the concrete containment bottom and sides were coated with a tar/roskote substance that had started flaking and coming loose in several locations. All of the material was removed and placed in plastic bags, samples were taken to make sure the material does not contain asbestos. Pending the results of the analytical, the material will be properly disposed of. Also during the cleaning event several cracks were discovered in the floor and sides of the concrete containment. We had a RPE calculate the tank volumes and containment capacity to make sure that the containment capacity was sufficient, his assessment is attached. Our plan is to determine if the area beneath the floor of the containment has been impacted by drilling holes in the floor and testing the soil beneath the floor. If the tests are negative we will plug the holes, remove the waste water and condensate tanks, thoroughly clean the area and spray a rhino lining on the concrete. Bids have already gone out to contractors to perform the necessary work.

OCD * **STILL OPEN:**

The OCD will wait until it receives the facility diagram identifying the drain ports and lines to close concerns for Photo 5.

Where were the tar/roskote substances taken to?

Please provide the OCD an update on the results of the soil beneath the floor and the status of the crack work and rhino spray.

Photo 10: Unidentified drum

The drum contained ambitrol or anti-freeze. The contents were placed in the ambitrol storage tank.

OCD * CLOSED.

Remediation of soils:

Soil samples will be collected around the engine room for waste determination analysis.

All of the soils will be remediated in accordance to the OCD guidelines.

OCD * Please provide update on these results and resolution if found to not meet criteria.

Tony Savoie

Waste Management and Remediation Specialist

Southern Union Gas Services

Lowe, Leonard, EMNRD

From: Savoie, Tony [tony.savoie@sug.com]
Sent: Friday, November 07, 2008 8:49 AM
To: Lowe, Leonard, EMNRD
Subject: Jal South GW-283
Attachments: OCD Resonse 11-7-07.pptx; Jal South CS - Containment Area Calculation Letter 101308.pdf; resposne 11-7-07.docx

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This inbound email has been scanned by the MessageLabs Email Security System.

**Southern Union Gas Services
Jal South Compressor Station
GW-283**

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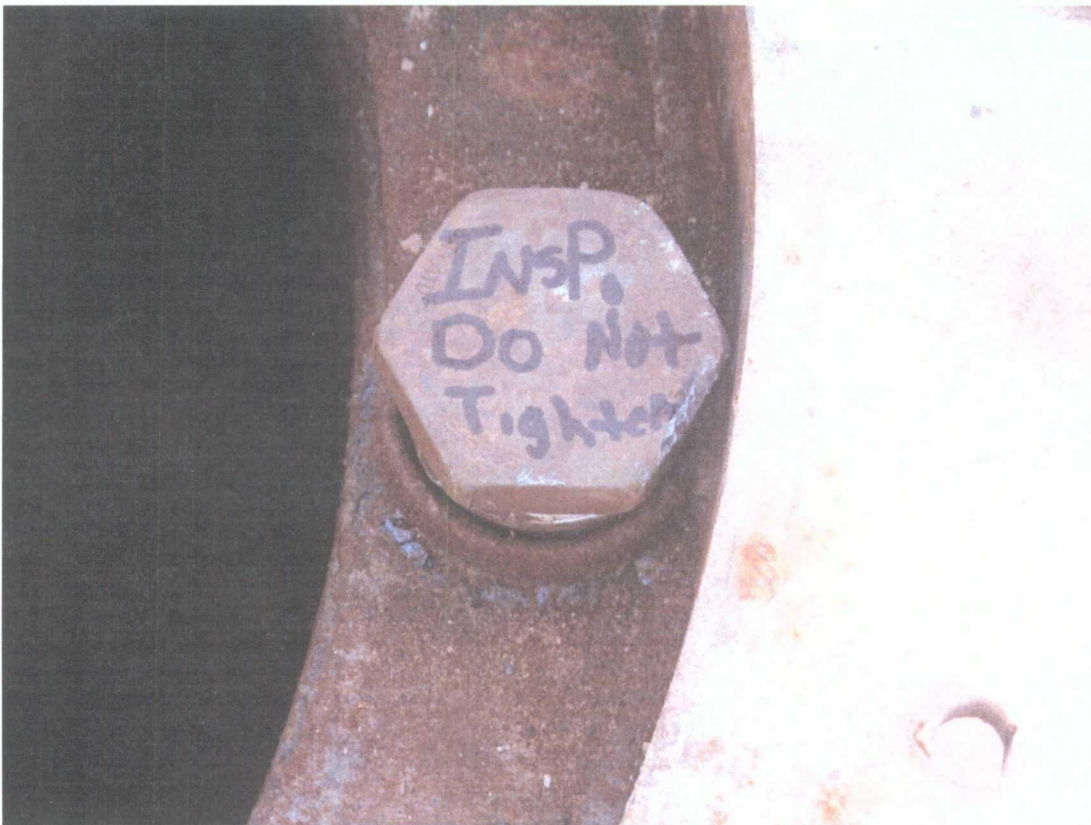
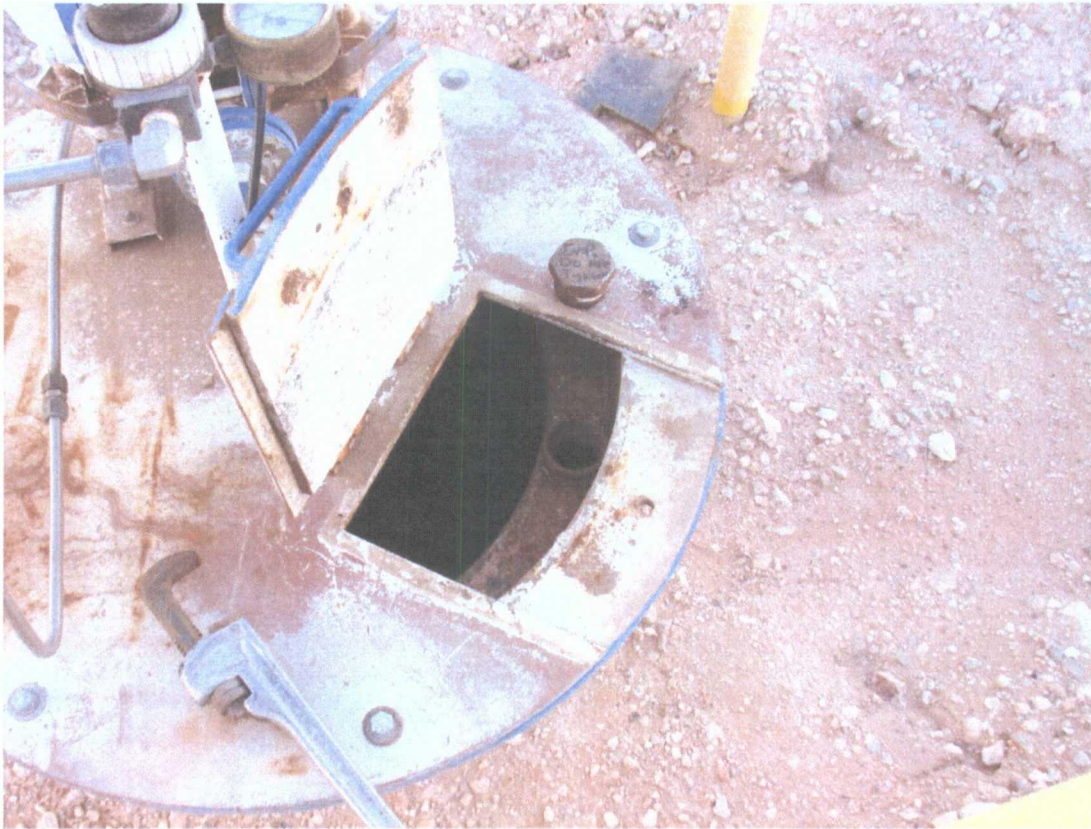
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Tony Savoie

Waste Management and Remediation Specialist

Southern Union Gas Services



Station Sump Inspection plug



Concrete containment floor
After cleaning 10/7/08



Containment area as Bid
For re-lining



Scrubber Catch Basin with common drain opening



Engine room floor Drain

H.A. CLARK, INC.

Environmental Project Managers and Engineers

**2500 Wilcrest Drive, Suite 300
Houston, Texas 77042**

**Telephone: 713/365-9540
Fax: 866/505-0324**

October 13, 2008

Mr. Tony Savoie
Environmental Health and Safety Coordinator
Southern Union Gas Services
610 South Commerce Street
Jal, New Mexico 88252

**Re: Jal South Compressor Station
Southern Union Gas Services
Jal, New Mexico
Oil Storage Containment Area Capacity**

Dear Mr. Savoie:

On October 13, 2008, I calculated the containment capacity of the concrete containment area associated with the oil storage tanks at the Jal South Compressor Station, south of Jal, New Mexico. The containment area measures 54 feet long by 24 feet 8 inches wide by 2 feet 5 inches deep. There is also a concrete sump that measures 4 feet long by 2 feet wide by 1 foot 4 inches deep. The total capacity of the containment area is calculated to be 24,243 gallons. With an allowance for the capacity occupied by the Oily Waste Water Tank, the useable capacity of the containment area is approximately 23,960 gallons.

The following tanks are stored in the containment area:

<u>Tank</u>	<u>Tank Diameter (feet and inches)</u>	<u>Tank Height or Length (feet and inches)</u>	<u>Capacity (gallons)</u>
Condensate	12	10	8,400 (200 barrels)
Oily Waste Water	7'11"	10	3,780 (90 barrels)
Ambitrol	3'10"	16	1,375
Ambitrol	3	10'6"	550
Used Oil	3	10'6"	550
Lube Oil	8	16	6,000

Jal South Compressor Station
Southern Union Gas Services
Jal, New Mexico
Oil Storage Area Containment Capacity
October 13, 2008
Page 2

The capacity of all the tanks in the containment area is approximately 20,655 gallons. Therefore, the available containment capacity of 23,960 gallons is sufficient to hold the contents of all tanks stored in the area, plus ten percent of the total tank volume to account for precipitation.

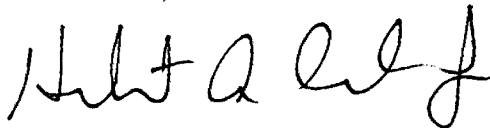
The Oil Conservation Division (OCD) of the New Mexico Energy, Minerals and Natural Resources Department requires that storage tanks for fluids other than fresh water "...be bermed to contain a volume one-third more than the largest tank. If tanks are interconnected, the berm must be designed to contain a volume one-third more than the total volume of the interconnected tanks" (Guidelines For The Preparation Of Discharge Plans At Natural Gas Plants, Refineries, Compressor And Crude Oil Pump Stations (Revised 12-95), page 9). None of the tanks are interconnected.

The largest tank in the containment area is the Condensate Tank. The required capacity of the containment area under OCD rules is $8,400 \text{ gallons} \times 1.33 = 11,172 \text{ gallons}$. Therefore, the containment area capacity of 23,960 gallons is sufficient.

If you have any questions or would need additional information, please do not hesitate to call me at 713-365-9540.

Sincerely,

H.A. CLARK, INC.



Herbert A. Clark, Jr., P.E.
New Mexico License No. 13092

cc: Mr. Herb Harless – Southern Union Gas Services
Mr. Dennis Slack – Southern Union Gas Services
Mr. Randall Dunn – Southern Union Gas Services
Mr. Lou Soldano – Southern Union Company

INSPECTIONS FROM GU-283 PERMIT CONDITIONS

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections. The facility was inspected on July 14, 2008. Mr. Tony Savoie from Southern Union was present. Reference all photos in attached photo inspection sheet.

Photo 1: The below grade tank leak detection system port could not be removed for inspection. Below grade tanks are to be inspected on a monthly basis, see Condition 11. The OCD request the monthly inspection reports for this below grade tank and all below grade tanks located at this facility.

Photo 2 – 4: There appears to have been some discharge near the compressor located inside building. Southern Union Gas shall ensure that any planned or unplanned discharges from reaching the ground. The entry door needs to be set to prevent discharge on to the ground or other resolution to prevent this from occurring.

Photo 5: A secondary containment located between compressor "A" and the north scrubber has a drain that is not identified. It is not known where this port drains to. Southern Union Gas shall identify where this port drains to and if it was ever tested.

Photo 6: The sump located in the large secondary containment needs to be cleaned out, tested and inspected. A sump is not intended to hold fluids indefinitely. If drainage from sump to another tank has not been tested, it shall be tested. The OCD request the sump testing and inspection records, in addition the dimensions for all sumps located within the permitted facility. See condition 11 of the permit conditions.

Photo 7 – 8: The entire secondary containment needs to be drained, cleaned and inspected for cracks. A secondary containment shall maintain a volume of 133 % of its holding capacity. Southern Union Gas shall report to the OCD the condition of the secondary container once cleaned and inspected, including photos.

Photo 9: This low point appears to be plugged and receding fluids in secondary containment. Southern Union Gas shall inspect the cause of the plugged drain. The OCD request the drain line hydrostatic test records. Low point shall be cleaned and inspected with along with entire secondary containment referenced in Photo 7 – 8.

Photo 10: Barrel appears to not be labeled. SUG shall ensure that this and all containers on site be labeled and properly stored according to its discharge plan permit conditions.

Southern Union Gas Ltd shall submit to the Environmental Bureau Oil Conservation Division a report to resolve these issues within **60 days** from permit date, received by **November 7, 2008**.

PHOTOS ARE ATTACHED TO THE PERMIT. SEE "PERMIT"