

INSPECTIONS & DATA

NMOCD INSPECTION REPORT

SITE: El Paso Natural Gas (EPNG) Blanco Gas Plant

INSPECTED BY: Bill Olson and Ed Martin

<u>INSPECTION DATE:</u> January 28, 2003, 8:00 am – 9:30 am

COMPANY REPS. David Bays and Ronald Sipe, EPNG

ALLEGATIONS:

"The Blanco Refinery was formerly owned by El Paso Natural gas. It is very close to the Bloomfield Irrigation Ditch."

"...they took contaminants from the plant, put them in 55 gallon drums, dug a trench, put the barrels in the trench, poked holes in the barrels, and covered up the mess with soil."

"...site was added to the CERCLIS database on October 1, 1986,...with a status of no further remedial action planned..." (EarthJustice Legal Defense Fund 1/6/03 Petition to EPA)."

INSPECTION FINDINGS:

The area in the photograph of the petition is the site of the above-ground fresh water tanks on a hill east of the former EPNG camp housing between the Blanco gas plant and the Dynegy Val Verde gas plant. The former camp was used to house El Paso employees. According to EPNG these tanks have been there since the 1950's and have always been used to store fresh water. The remainder of the area is vacant land with one small leveled area. The area identified is approximately ¹/₄ mile from the Citizens Irrigation Ditch. There is not, nor has there ever been, a refinery of any sort near the site in question. The site of the alleged disposal trench is not specified. EPNG stated that they were not aware of any disposal activities in this area. There was nothing to indicate that any dumping took place in the area where the photograph was taken.

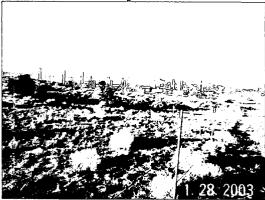
The reference to the CERCLIS database addition may be associated with prior NMED investigations of chromium contamination at the gas plant in 1988. At the direction and oversight of OCD, EPNG has conducted extensive soil and ground water remediation projects at the Blanco gas plant related to former unlined pits, chromium contamination and leaks and spills. Investigation and remediation of this contamination has been ongoing since 1989 (see GW-49).

RECOMMENDATIONS

Request that EPNG give OCD a written response to the allegations in the petition to EPA and request that the petitioner provide more detailed information on the alleged disposal area.



EPNG Blanco "Refinery". View in this photo is same as one in photograph included with Earthjustice letter.



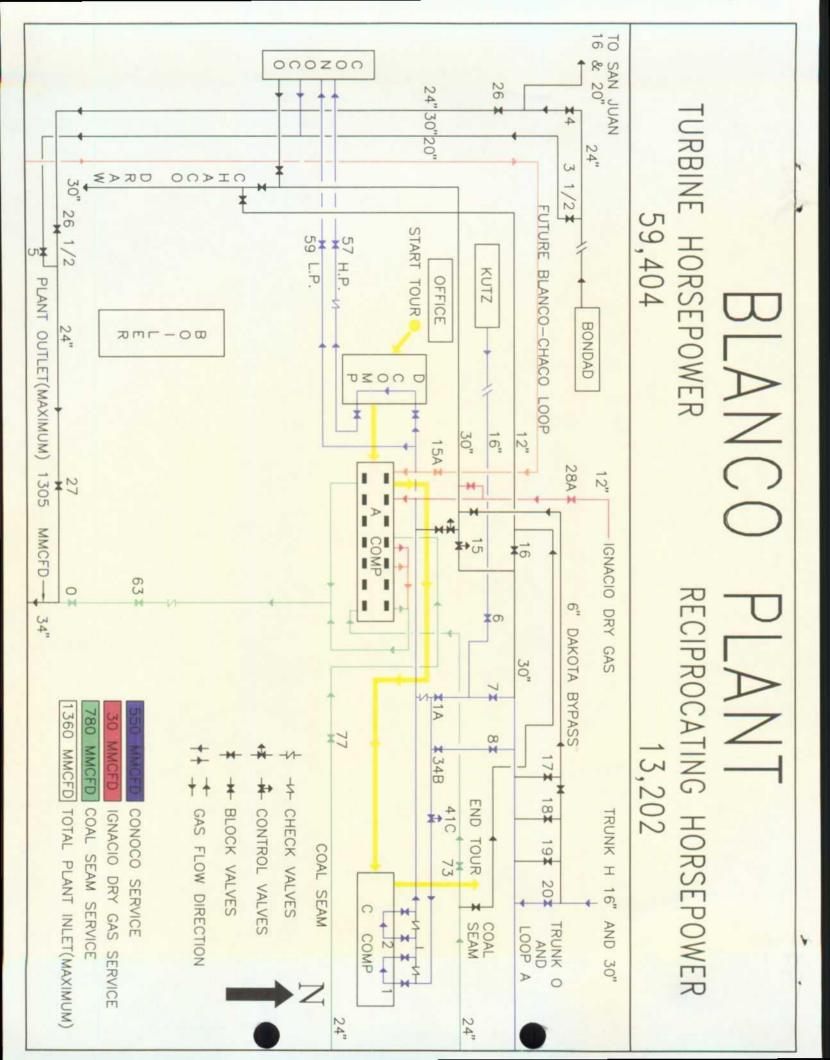
EPNG Blanco "Refinery". View is from the gate in above picture looking West toward EPNG Blanco Plant.



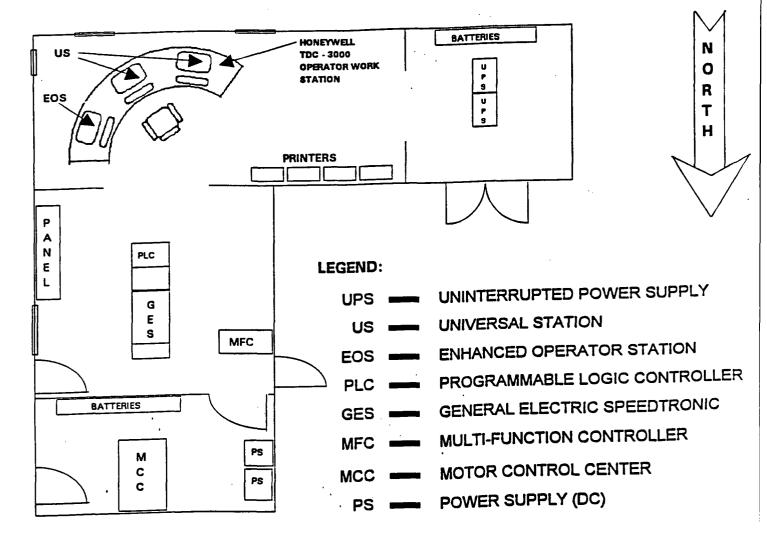
EPNG Blanco "Refinery". View in this photo is same as one in photograph included with Earthjustice letter.



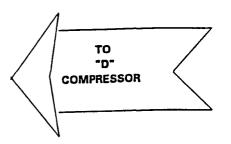
EPNG Blanco "Refinery". View is from the gate in above picture looking West toward EPNG Blanco Plant.



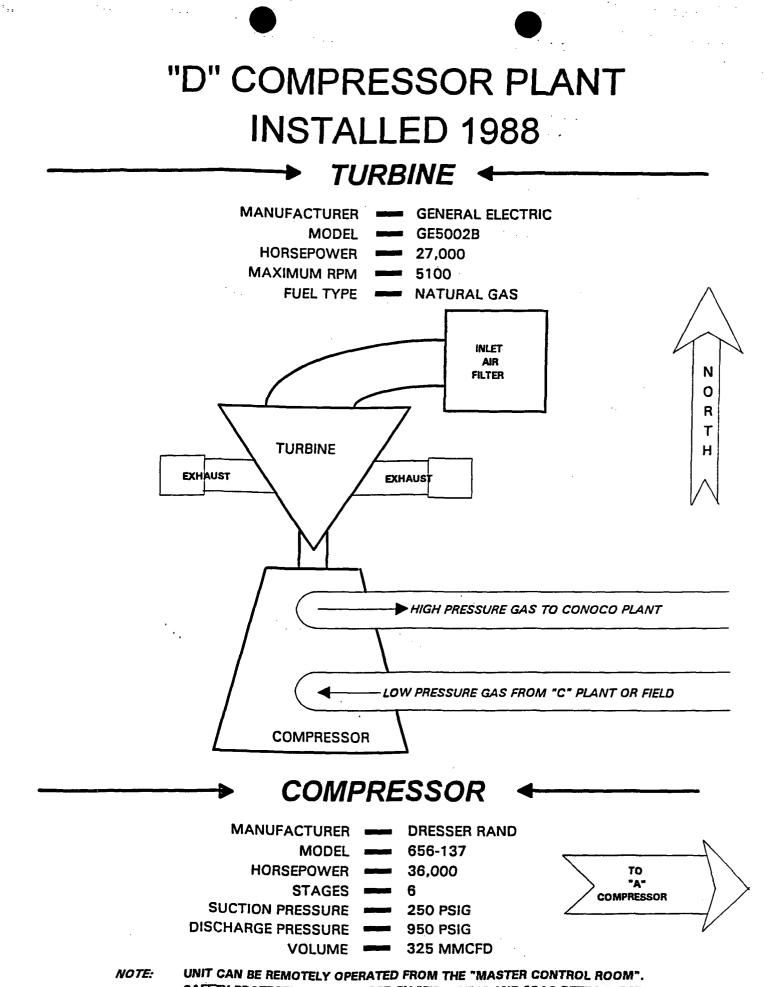
MASTER CONTROL ROOM INSTALLED 1988



NOTE:

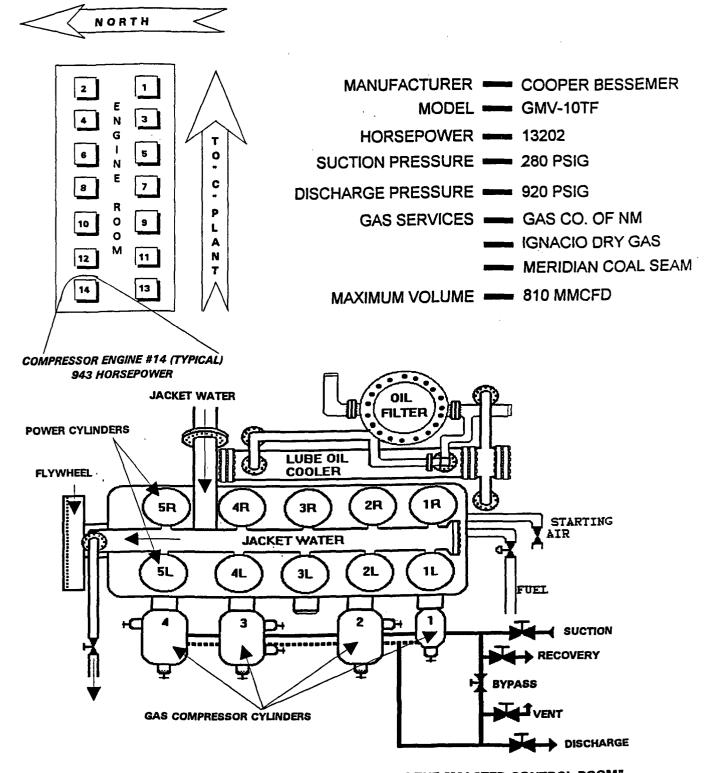


THE OPERATOR STATION IS CONNECTED TO MULTIPLE PLC'S LOCATED IN EACH AREA OF THE PLANT. THESE PLC'S ARE CONNECTED TO THE VARIOUS PRESSURE, TEMPERATURE AND OTHER SIGNAL TRANSMITTERS. THIS ALLOWS THE CONTROL ROOM OPERATOR TO "SEE" AND CONTROL THE PLANT EQUIPMENT.



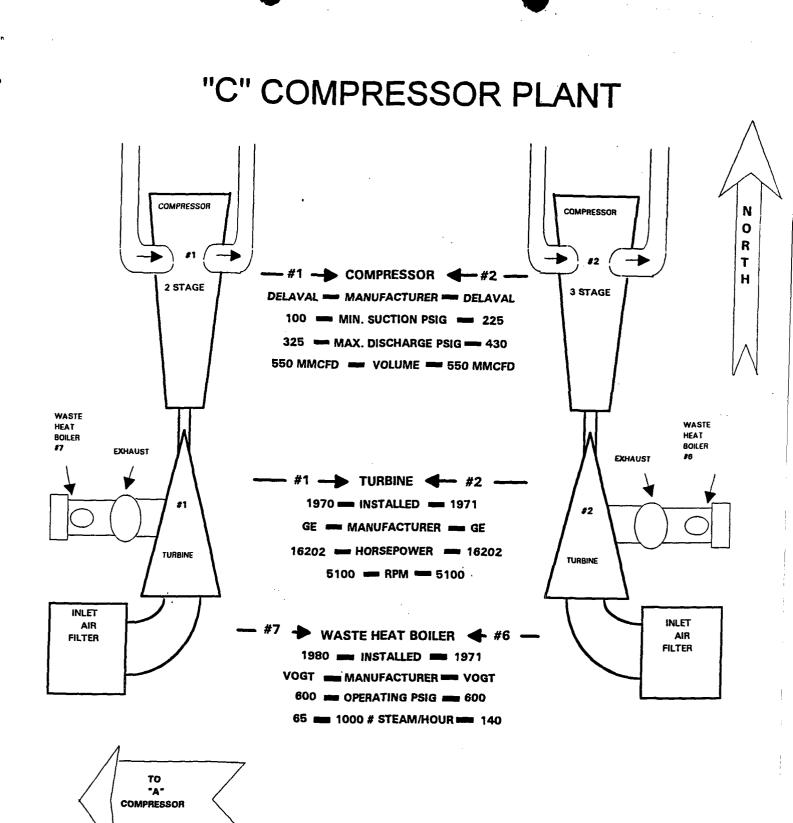
SAFETY PROTECTION IS PROVIDED BY "FIRE EYES" AND "GAS DETECTORS".

"A" COMPRESSOR PLANT INSTALLED 1953



NOTE:

UNITS CAN BE REMOTELY OPERATED FROM THE "MASTER CONTROL ROOM". SAFETY PROTECTION IS PROVIDED BY "FIRE EYES" AND "GAS DETECTORS".



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OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: <u>3-9-00</u> Time: <u>1 PM</u>
Type of Facility: Refinery 🗅 Gas Plant 🗇 Compressor St. 🖉 Brine St. 🗇 OilField Service Co. 🗆
Surface Waste Mgt. Facility
Other □
Discharge Plan: No D Yes & DP# G-W-049
FACILITY NAME: PLANCO PLANE
PHYSICAL LOCATION: Legal: QRT_NE_ORT_NE_SEC23 TS27WR_13_M County SAN_JURN
N/1 14 29N 11W
OWNER/OPERATOR (NAME) EL PASO MATURAL GAS
Contact Person: <u>RICHARA DUAR EE</u> Tele:# <u>505-831-7763</u>
MAILING
ADDRESS: 38°1 AtRISCO BLUG NW ALBR State NM ZIP 87120 Owner/Operator Rep's: RUSS PYEREE, DALE CREWSHAW, R. DURATE
Owner/Operator Rep's: RUSS PYEATE, DALE CHENSHAW, R. DUANTE
- A lashad
Manufact
OCD INSPECTORS: 21 PRICE, E MARTIN, D FOUST
1. <u>Drum Storage</u> : All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
BONE YARD EMPLY AREA NEED TO HAVE DRUMS STORED PROPERLY
2. <u>Process Areas</u> : All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
OK
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3. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

OCD Inspection Sheet Page ____ of ____

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1. PLANT VEHICLE FUEL AREA - HOLE IN CONCRETE PAD. LEAKING OIL etc. WASSE DUAASTER CONTANAEN DECIA THE DIL / ANTEI FREEZE (PROPERLYCASE GLYCOL) BERN-BESCHARGE ARAINA - CONCRETE SEALS NEED ATTENTION. REPLACING NEENS 4. <u>Above Ground Saddle Tanks</u>: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure. Óŕ 5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency FUSER ORAIN notification information. 1. BONE YARD EMPTY DRUM OIL ORUMS NEED LABELS 2. COOLING TOWER CHEMICAL BRUR "C" PLANT NEED NEW LABEL Ato PLANT SE LUBE OIL TANKS NEED LADGER LADELS 3 6. <u>Below Grade Tanks/Sumps</u>: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. CODIES ATTACTED CØ 1-11 SEA WATER - EPNG WILL CHECK HAD 7. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. WILL BE TESTED BY SEPTEMBER 2001 8. <u>Onsite/Offsite Waste Disposal and Storage Practices:</u> Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? <u>Yes</u> No ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES 🔄 NO 🗇 IF NO DETAIL BELOW. OCD Inspection Sheet

Page ____ of ____

9. <u>Class V Wells:</u> Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO & YES I IF YES DESCRIBE BELOW ! Undetermined I

10. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD

11. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

<u>ØK</u>

12. Does the facility have any other potential environmental concerns/issues?

1. OLD CHROMATE Pit MONITORING WELLS/AREA - FOUND YELLOW STAIN SOIL 3. D. TURBINE SUMP MONITOR WELL COOLING POND - EVAPORA ton BLOW DUN - CLOSED C PLANE SUMP 4. 13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.? SPEC-VES STORMWATER-NO

14. ANY WATER WELLS ON SITE ? NO & YES □ IF YES, HOW IS IT BEING USED ? <u>FRESH WATER CITY OF BLOOMFIBLA</u> PROCESS WATER CITIZER AIBEH

Miscellaneous Comments:

VELLOW STRAN ISOLATE 2 FLAME STACK 10 175 AREA SAMALES collect OCP

going to GIAUE REFINERY. SEND MANIFEST FOR LIQUID WASTE UT1K

Number of Photos taken at this site: _______ attachments-

OCD Inspection Sheet Page ____ of ____

EL PASO NATURAL GAS-BLANCO PLANT COMPRESSOR STATION GW-049 MARCH 09,2000 PICTURES BY WAYNE PRICE -OCD



Main entrance-looking south



plant vehicle fuel pad



Special waste dumpster-leaking oil



Stormwater drain south side of plant along boiler room building.



Boiler evaporator blow-down pit



SAB leak detector

EL PASO NATURAL GAS-BLANCO PLANT COMPRESSOR STATION GW-049 MARCH 09,2000 PICTURES BY WAYNE PRICE -OCD



Plant wastewater treater & collection pond before POTW







Old Chromate monitor well area FORMER SOUTH-FLARE Pit



Old flare pit area.



Yellow stain soil found near old chromate monitor well area 75 feet east of flare stack.



SAB



Bone yard used oil filter drain drums



Plant drainage area looking southwest. Flare stack in background.



C Plant area. old sump area and new tank area.



C plant lube & antifreeze storage-



Stormwater draining area between C and old B plant area.

EL PASO NATURAL GAS- BLANCO PLANT COMPRESSOR STATION GW-049 MARCH 09,2000 PICTURES BY WAYNE PRICE -OCD

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pyramid sump for used lube oil

EL PASO NATURAL GAS CO.

BLANCO PLANT

AERIAL PHOTOGRAPHS

FROM



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1958,1965,1970,1972,1976 1979,1981,1982,1984,1987

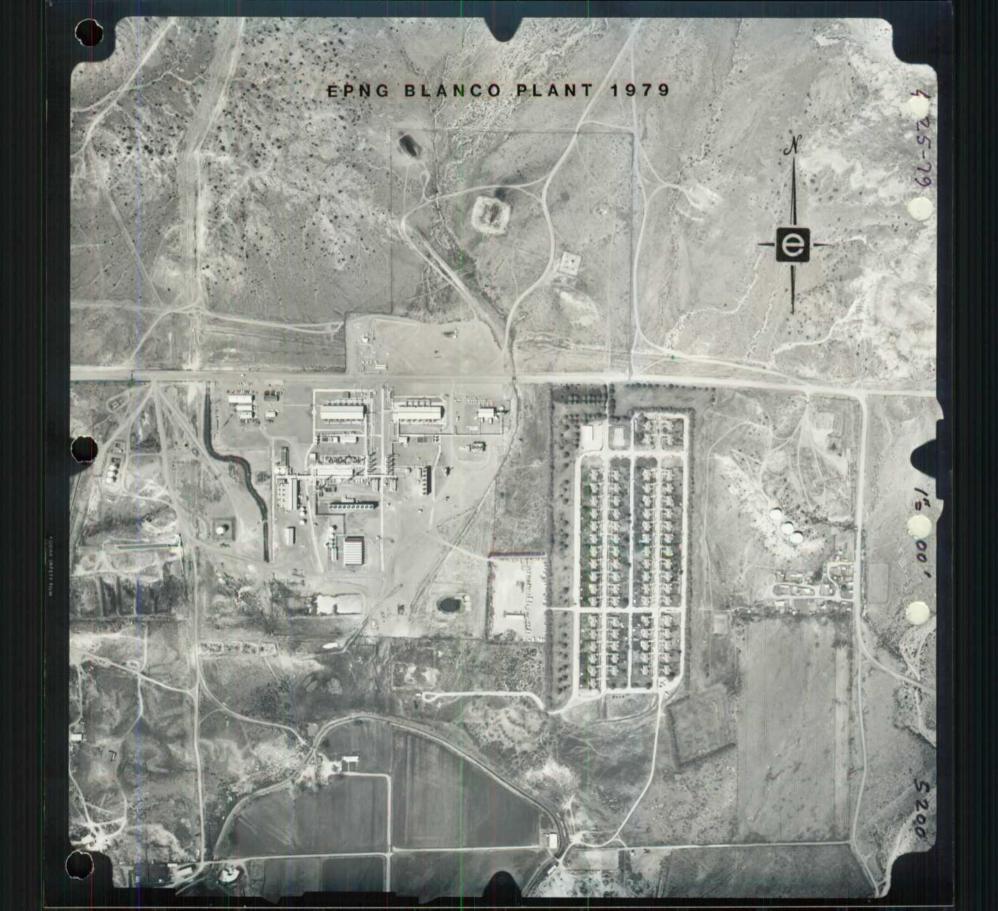
Submitted to NMEID on November 1988











· C - / COLOR NEG. "H" PAPER



