

GW - 52

WORK PLANS

1997

**CORRECTIVE ACTION PLAN FOR
ROSWELL COMPRESSOR STATION NO. 9
SURFACE IMPOUNDMENTS**

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LIST OF ACRONYMS AND ABBREVIATIONS

AST	Aboveground storage tank
B&C	Brown and Caldwell
B&R	Brown & Root Environmental
bgs	Below ground surface
BTEX	Benzene, toluene, ethylbenzene, and xylenes
CAP	Corrective Action Plan
CES	Cypress Engineering Services
DBS&A	Daniel B. Stephens & Associates, Inc.
DO	Dissolved oxygen
DQOs	Data quality objectives
EDAC	Earth Data Analysis Center
FID	Flame ionization detector
Halliburton	Halliburton NUS Environmental Corporation
HLA	Harding Lawson Associates
HRMB	Hazardous and Radioactive Materials Bureau (NMED)
MS/MSD	Matrix spike/matrix spike duplicate
NMED	New Mexico Environment Department
NMSHTD	New Mexico State Highway and Transportation Department
OCD	Oil Conservation Division
OVA	Organic vapor analyzer
PARCC	Precision, accuracy, representativeness, completeness, and comparability
PID	Photoionization detector
QA	Quality assurance
QAPP	Quality assurance project plan
QC	Quality control
PPE	Personal protective equipment
PSH	Phase-separated hydrocarbons
RPD	Relative percent difference
SEO	State Engineer Office
SVE	Soil vapor extraction
TCLP	Toxicity characteristic leaching procedure
TDS	Total dissolved solids
TNRCC	Texas Natural Resources Conservation Commission
TPH	Total petroleum hydrocarbons
USGS	United States Geological Survey
VOCs	Volatile organic compounds
SVOCs	Semi-volatile organic compounds

1. CORRECTIVE ACTION PLAN OBJECTIVES AND ORGANIZATION

The overall objective of this Corrective Action Plan (CAP) is to provide the basis for performing further assessment and remediation at the former surface impoundments at the Transwestern Pipeline Company (Transwestern) Roswell, New Mexico, Compressor Station No. 9. Transwestern intends to remediate soil and ground water affected by a release from the former impoundments in such a manner whereby any hazardous constituents that may be present are removed to the extent that future threats to human health and the environment attributable to the facility no longer exist.

A phased approach has been and will continue to be used to achieve the corrective action objectives. In general, the objective of Phase I, which was completed in August, 1995, was to characterize the nature of affected soil immediately beneath the former impoundments. The objective of Phase II of investigation, which was completed in September, 1996, was to evaluate two additional potential source areas and to further assess the lateral and vertical extent of affected soil and ground water. The objective of Phase III of investigation will be to complete the assessment of the lateral and vertical extent of affected soil and ground water. This phase will include the installation of a deeper ground water monitor well into the regional aquifer. Subsequent phases may be required to complete assessment activities and to address corrective actions that may be required to meet soil and ground water cleanup criteria. Scopes of work for phases not included within this document will be prepared and submitted to the NMED.

This CAP is organized in the following manner. The site background is described in Section 2 to provide a basis for the proposed corrective action activities. The results of all previous subsurface environmental investigations, including the Phase I and Phase II assessment results, are summarized in Section 3. The proposed Phase III soil assessment and ground water assessment plans are outlined in Sections 4 and 5, respectively. A quality assurance project plan is included in Section 6 to ensure that the data generated are of sufficient quality to support subsequent decisions. Remediation objectives and a preliminary remediation strategy are included in Section 7. The anticipated project schedule and reporting requirements are included in Section 8.

2. SITE BACKGROUND

The Roswell compressor station is located approximately 9 miles north of the city center of Roswell, New Mexico along the east side of U.S. Highway 285 (Figure 1-1). Sections 2.1 through 2.5 provide background information regarding the facility layout and operation, history of the former surface impoundments that are the subject of this CAP, as well as the regional geographic, geologic, and hydrologic setting.

2.1 Facility Description

The Roswell compressor station is situated on approximately 80 acres of land in Sections 21 and 28 (T. 9S. R. 24E.), Chaves County, New Mexico (Figure 1-1). The property is privately owned by Transwestern Pipeline Company, while the remainder of Sections 21 and Section 28 are State Trust Land (Glenn, 1993). Site access is via U.S. Highway 285, and the entire property is secured by a chain link fence. The following is a list of pertinent information regarding the facility:

<i>Facility name</i>	Transwestern Pipeline Company Compressor Station No. 9
<i>Facility address</i>	Transwestern Pipeline Company 6381 North Main Street P.O. Box 1717 Roswell, New Mexico 88202-1717
<i>Telephone number</i>	(505) 625-8022
<i>EPA I.D. number</i>	NMD 986676955
<i>County and state</i>	Chaves County, New Mexico
<i>Property legal description</i>	SW $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 21, T. 9S. R. 24E. NW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 28, T. 9S. R. 24E.
<i>Latitude/longitude of former impoundments</i>	Pit 1: N33°30'54" / W104°30'55" Pit 2: N33°30'55" / W104°30'55"
<i>Site elevation</i>	Approximately 3610 feet above sea level

The Roswell compressor station is located along the Transwestern natural gas pipeline that

extends from Texas to California. Natural gas is received from the east through two 24-inch pipelines, the West Texas Lateral and the Panhandle Lateral, and leaves to the northwest through two 30-inch pipelines. The primary function of the compressor station is to boost the pressure of the natural gas stream by means of compressors powered by natural gas internal combustion engines. The facility also includes the district offices for Transwestern's New Mexico operations, along with other ancillary buildings including a warehouse and a repair shop (Figure 2-1). The compressor station has been in operation at this location since August 9, 1960.

The only environmental permit currently in force is Discharge Plan GW-52 with the New Mexico Oil Conservation Division (OCD).

2.2 History and Operation of Former Surface Impoundments

The primary function of the former impoundments was to contain pipeline condensate, a mixture of hydrocarbon liquid and water that accumulates during the periodic cleaning of the natural gas pipelines. Natural gas is composed mostly of alkane compounds, with methane being the most abundant (Eiceman, 1986). In addition, natural gas contains variable concentrations of heavier molecular weight hydrocarbons (C4+), which may condense due to changes in temperature and pressure within the pipelines. Besides the higher molecular weight hydrocarbons derived from the natural gas itself, pipeline condensate may also contain lube oil blow-by derived from upstream gas compressors. The lube oil blow-by consists of lubricating oil that bypasses the compressor and enters the natural gas pipeline.

Pipeline condensate is periodically removed from the pipeline through "pigging" operations, which make use of a cylindrical piston-like device known as a "pig." The pig cleans the condensate from the interior pipeline wall by scraping and brushing as it is pushed through the pipeline by the pressurized gas stream. The pig and the accumulated liquid condensate are removed from the pipeline at the "pig receiver" (Figure 2-1). Currently, all condensate is collected and stored in an aboveground tank. The condensate is then sold for use as fuel. Formerly, the condensate was stored in one or more unlined surface impoundments that are the

subject of this CAP. The impoundments have been variously referred to as the "disposal pit" or the "burn pit." The latter term refers to the reported practice of periodically burning the hydrocarbon liquids in the impoundment to reduce their volume (Campbell, 1993).

The first reported use of a surface impoundment at this location was in August of 1960, shortly following construction of the compressor station in 1960 (Campbell, 1993). However, no records are currently available showing the exact location or size of this surface impoundment or others that may have been used subsequently until the last remaining surface impoundment was backfilled in 1986. Correspondence among Transwestern, NMED, and OCD has generally referred to a single impoundment as "the disposal pit" (Campbell, 1992) or "the burn pit." However, the General Plan map for the Roswell compressor station (Transwestern, 1959) showed two surface impoundments located in the northeast corner of the facility, in the NE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 21, T. 9S. R. 24E. The locations of the two former burn pits as previously shown on the General Plan were found to be incorrect, as discussed below.

A report prepared by Metric Corporation (1991) indicated the possibility that three pits had existed in the northeast corner of the facility. The three pits are designated in the Metric report (1991) as Pit 1 (southernmost), Pit 2 (northeast), and Pit 3 (northwest). For the sake of consistency, these designations will be retained throughout this CAP. However, it should be noted that the existence of Pit 3 is less certain than Pits 1 and 2, as described below.

Prior to the preparation of this CAP, the location and number of former surface impoundments was not known precisely. In order to clarify the number and exact locations of the former impoundments, DBS&A obtained historical aerial photographs showing the compressor station. The following sources were contacted during this effort: the Earth Data Analysis Center (EDAC, Albuquerque), the Bureau of Land Management (BLM, Albuquerque), the New Mexico State Highway and Transportation Department (NMSHTD, Santa Fe), IntraSearch (Denver), the Soil Conservation Service (SCS, Albuquerque), and the United States Geological Survey (USGS) Earth Science Information Center (Denver). Several aerial photographs showing the compressor station were located, and contact prints were obtained for six different photographs taken on the

following dates:

Date Flown	Approximate Scale	Source
07/28/61	1:23,000	EDAC-Albuquerque
10/10/72	1:25,000	NMSHTD-Santa Fe
06/21/73	1:32,000	BLM-Albuquerque
02/23/77	1:40,000	SCS-Albuquerque
04/19/81	1:26,000	BLM-Albuquerque
08/05/82	1:19,000	NMSHTD-Santa Fe

The 1961 aerial photograph shows a single feature that appears to be a surface impoundment in the extreme northeast corner of the property. This impoundment corresponds to Pit 2 on Figure 2-1. This appears to be the first surface impoundment constructed at the compressor station.

The 1972 and 1973 photographs reveal two features that appear to be surface impoundments. In order to more clearly see these features, enlargements were made of the 1973 and 1981 BLM photographs to scales of 1:5340 and 1:4330, respectively. Examination of the 1973 photograph shows two surface impoundments (Pit 1 and Pit 2 on Figure 2-1), with a third feature that may represent a backfilled impoundment (Pit 3 on Figure 2-1). However, the existence of Pit 3 could not be confirmed in the course of the Phase II subsurface investigation activities as described in Section 3.

In the 1977, 1981, and 1982 photographs, only Pit 1 remains visible (Figure 2-1). Pit 2 appears to have been backfilled prior to the February 23, 1977, flight, and the feature labeled as Pit 3 is no longer visible.

Pit 1 was taken out of service no later than November 1983 and backfilled in June of 1986 (Virtue, 1995). No wastes of any type were received after the out of service date. This information is supported by examination of facility drawings and work order completion reports which indicate that considerable facility piping and AST upgrades and installations were made

during 1982 and 1983. Based on the aerial photographs, the dimensions and approximate periods of operation of the two confirmed former surface impoundments were as follows:

Impoundment	Approximate Dimensions	Date Constructed	Date Backfilled
Pit 1	40' x 70' (rectangular)	After 7/61, before 10/72	6/86
Pit 2	70' diameter (circular)	Before 7/61	Before 2/77

It is estimated that the impoundments were at most 10 feet deep. Therefore, the maximum volumes of Pits 1 and 2 during their operational lifetimes were approximately 1000 and 1400 cubic yards, respectively.

In addition to the pipeline condensate, trace quantities of chlorinated solvent wastes were inadvertently released into the impoundments. Solvents were used at the facility primarily as degreasers to remove oily deposits on engine parts during maintenance of the compressor engines. The quantity of solvents and the exact type of solvents used is unknown as no purchase records of such materials exist for the site. However, based upon all information that is available, the solvent products which were used at the facility could not have generated a RCRA F-listed waste (Virtue, 1995).

2.3 Geographic Setting

The Roswell compressor station is located approximately 6 miles west of the Pecos River within the Pecos Valley drainage basin. The entire area west of the Pecos River is generally referred to as the west Pecos slope (Kelley, 1971), which rises westward from elevations of about 3,300 feet at the Pecos River to over 10,000 feet in the Capitan Mountains some 50 miles to the west. Tributary surface streams drain west to east toward the Pecos River. Local topography is generally of low relief. The mean annual precipitation as measured at the Roswell Municipal Airport for a 23-year period was 9.82 inches. The majority of the precipitation occurs in July and August during frequent summer thunderstorms.

2.4 Regional Hydrogeology

The Roswell compressor station lies within the northernmost portion of the Roswell hydrologic basin. The basin is structurally controlled by eastward-dipping carbonate and evaporite sequences of Permian age which were uplifted during the Tertiary period during the development of the Sacramento and Guadalupe Mountains along the western margin of the basin (Kelley, 1971). Eastward flowing tributaries originating in the western highlands have deposited Quaternary alluvium over the Permian age rocks west of the Pecos River.

Because the average dip of the Permian rocks is greater than the slope of the land surface, progressively younger units are encountered eastward toward the Pecos River. Several prominent northeast trending ridges and hills interrupt the gently sloping plains near the site. These structures are narrow fault zones referred to as the Border Hills, Six-Mile Hill, and the Y-O faulted anticlines.

The stratigraphic units of importance with regard to water resources are, in ascending order, the San Andres Formation (Permian), the Artesia Group (Permian), and the undifferentiated Quaternary valley fill alluvium. Figure 2-2 shows the generalized stratigraphy in the vicinity of the site. Ground water is produced from both a shallow water-table aquifer (alluvium) and a deeper artesian aquifer that includes the two bedrock units (Welder, 1983). The deep bedrock aquifer is commonly known as the Roswell artesian aquifer. According to the State Engineer Office (SEO), approximately 400,000 acre-feet of water are pumped annually from the two aquifers of the Roswell hydrologic basin (DBS&A, 1992). The two aquifers are separated by a semi-confining layer, but are connected where the carbonate aquifer rises structurally to meet the shallow aquifer. Both aquifers are recharged along surface exposures on the slopes to the west and are believed to discharge to the Pecos River at the eastern margin of the basin.

The following subsections describe each of the hydrostratigraphic units in the Roswell basin in detail.

2.4.1 San Andres Formation

The San Andres Formation consists primarily of a thick sequence of limestones, dolomitic limestones, and dolomites, with increasing quantities of interbedded anhydrite and gypsum to the north (Kelley, 1971). The formation is divided into three members, in ascending order: the Rio Bonito, the Bonney Canyon, and the Fourmile Draw members (Figure 2-2; Kelley, 1971). The average thickness of the formation is about 1,000 feet in the Roswell basin (Bean, 1949).

The Fourmile Draw member is the principal water-bearing unit within the San Andres Formation. High permeability has resulted from an irregular network of collapsed breccias, cavities, caves, and other interconnected open structures which were formed by dissolution of evaporite and carbonate beds. Gypsum beds become much more abundant in the Fourmile Draw member from Roswell northward (Kelley, 1971), and a well-developed karst surface is exposed where the unit is not covered by alluvium. In the northern portion of the basin the water-bearing zones of the San Andres Formation are approximately 400 to 600 feet thick and ground water flow is primarily to the east-southeast toward the Pecos River.

In general, the lower boundary of the Roswell artesian aquifer, in general, is defined by low permeability zones that commonly occur within the Bonney Canyon member, which lies approximately 450 feet below the surface in the vicinity of the Roswell compressor station (Figure 2-2). SEO well records for wells near the site indicate that the upper boundary of the San Andres is approximately 92 feet below ground surface (bgs) in this area.

2.4.2 Artesia Group

The Artesia Group includes the following formations, in ascending order: the Grayburg, Queen, Seven Rivers, Yates, and Tansill Formations. In the vicinity of the Roswell compressor station, only the first three formations are present. The Artesia Group consists primarily of dolomite, sandstone, and gypsum units of Permian age. The sedimentary sequence represents a rapid lateral

change in depositional environments from the southern massive reef complexes near Carlsbad to the northern clastic and evaporitic sequences representative of back reef and shelf environments (Kelley, 1971).

The Grayburg Formation unconformably overlies the San Andres Formation and ranges in thickness from 140 to 360 feet. The bottom of the Grayburg Formation provides a leaky confining bed that allows artesian ground water to move upward through the Artesia Group into the shallow alluvial aquifer. The thickness of this confining bed varies from 0 to 1,000 feet across the basin.

Drillers' logs in the Roswell area indicate that discontinuous permeable units in the upper Artesia Group act as water-bearing zones (Welder, 1983). Fractures and cracks between fragments of collapsed breccia and solution-enlarged bedding planes and joints constitute the principal sources of permeability. These water-bearing zones generally occur in the upper quarter of the confining unit and may yield water to wells that tap both the upper Artesia Group and the shallow alluvium.

In most areas the Artesia Group is covered by a veneer of Quaternary alluvium west of the Pecos River. In the northwest portion of the basin, the bedrock confining unit is thin or absent, and the clay beds within the valley fill act as the confining bed for the lower confined carbonate aquifer. Historically, the lower carbonate aquifer discharged upward into the alluvium, but within the past 50 years, the vertical gradient across the confining bed has reversed because of ground water pumping from the deep aquifer. This reversal has resulted in a downward gradient, causing ground water in the shallow aquifer to discharge to the deeper carbonate aquifer in some areas (DBS&A, 1992).

2.4.3 Quaternary Valley Fill

The Quaternary valley fill in the Roswell area was deposited by shifting streams flowing from the west toward the Pecos River. The valley fill consists of poorly to moderately consolidated

deposits of gravel, sand, and clay which mantle the underlying Permian rocks. The thickness of alluvial sediments varies considerably from one locality to another because of the irregular bedrock erosional surface upon which the alluvium was deposited. In some areas the alluvial fill is moderately well cemented.

The thickness of the shallow alluvial aquifer is shown on Figure 2-3 for the northern portion of the Roswell Basin. Lyford (1973) developed the thickness (isopach) map after examination of drill cuttings from 225 wells penetrating the valley fill. Lyford's map indicates that the alluvium near the site is generally less than 50 feet thick. In other areas, however, the thickness can exceed 250 feet thick where the alluvium fills depressions in the underlying bedrock surface. Recent SEO well records indicate that the alluvium near the site is approximately 70 feet thick (DBS&A, 1992).

Lyford (1973) described three distinct units in the valley fill of the Roswell Basin. These units were termed the quartzose, clay, and carbonate gravels. The quartzose unit consists of sandstone, quartzite, quartz, chert, and igneous and carbonate fragments with varying degrees of calcium carbonate cementation. The quartzose unit in the vicinity of the Pecos River consists primarily of medium to coarse, uncemented quartz grains (Welder, 1983). Silt and clay deposits occur as lenses overlying the quartzose unit. These lenses were deposited in small ponds and lakes that resulted from the dissolution and collapse of the underlying carbonate rocks. The carbonate-gravel unit overlies the other valley fill deposits and generally consists of coarse carbonate gravel with intermixed silts and caliche.

The alluvial sediments underlying the compressor station, as observed in borings drilled during several investigations (Section 3), consist predominantly of interbedded cobbles, gravel, sand, silt, and clay. The finer-grained zones form lenticular beds which appear to be discontinuous across the site. Some of the alluvial deposits are firmly cemented in some places. These lithologic descriptions are consistent with Lyford's descriptions of the valley fill.

The principal water-bearing zones of sands and gravels are separated by less permeable lenses of

silt and clay. According to Welder (1983), one to five water-bearing zones exist within the valley fill, and in many areas the alluvium is hydraulically connected to the upper bedrock units of the Artesia Group. The perimeter of the shallow alluvial aquifer is generally bounded by a margin of less permeable alluvium.

Figure 2-4 shows the approximate elevation of the water table in the shallow alluvium, as determined from measurements of water levels in wells completed in the alluvium (DBS&A, 1992). The map indicates that the station lies slightly outside the mapped extent of the shallow alluvial aquifer and that ground water flow is toward the Pecos River. Although a thin layer of saturated alluvium exists as far north as Arroyo del Macho, Welder (1983) did not include this area within the extent of the shallow alluvial aquifer as defined by him, primarily because the ground water quality in this area is too poor to be used for water supply purposes (DBS&A, 1992). The poor water quality in the shallow alluvial aquifer from slightly south of the Roswell compressor station northward is due to the presence of gypsum beds of the Fourmile Draw member at the base of the alluvium.

Because of the poor water quality and the low yields, most wells completed in the shallow alluvium are used primarily as livestock water supplies. In general, the chloride content of water in the shallow aquifer increases from west to east and ranges from 20 mg/L to 3700 mg/L (Welder, 1983). The presence of gypsum beds results in objectionably high calcium and sulfate concentrations in the shallow alluvial aquifer in the vicinity of the Roswell compressor station and northward. Sulfate concentrations are typically in the range of 2,000 to 3,000 mg/L, which is approximately equal to the equilibrium saturation concentration for ground water in direct contact with gypsum ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$). Thus, background sulfate concentrations in this area are four to five times above the New Mexico Water Quality Control Commission ground water standard for sulfate of 600 mg/L. The poor water quality in the alluvium is consistent with the high total dissolved solids concentrations reported for ground water from the on-site monitor wells, as discussed further in Section 3.

2.5 Water Well Inventory

A survey was conducted to locate water supply wells within 2 miles of the Roswell compressor station. This survey was accomplished by searching a water well database created by DBS&A that is based on the USGS Ground Water Sites Inventory database. The database contains the locations of all known water wells plus additional information regarding well construction, well use, and aquifer penetrated. The water well database was compiled by DBS&A for a ground water modeling project conducted for the SEO.

A review of the database revealed that there are 18 wells (including active and inactive wells) within about 2 miles of the compressor station. Table 2-1 details the location, total depth, depth to water, use, and completion aquifer for each of these 18 wells, along with their distance from the compressor station, and Figure 2-5 shows the locations of the wells relative to the site.

On December 2 and 3, 1994 a field reconnaissance of the off-site wells was conducted, and the wells were accurately located using a Magellan GPS satellite navigator. In addition, the condition and current use of each well was noted. The results of the well inventory and field reconnaissance are described below.

The closest off-site well to the former surface impoundments is a shallow livestock well completed in alluvium to a depth of 58 feet (well 3 on Figure 2-5). This well, which is no longer in use, is located about a half mile due east of the impoundments in the direction that would presumably be downgradient. The well is completed with 8⁵/₈-inch casing, and the depth to water measured in 1937 reportedly was 15 feet. The well is presently plugged and abandoned, and may have gone dry because of declining water levels in the Roswell area.

The next nearest well is a 352-foot-deep well (TW-1) located in the southwestern portion of the compressor station property (well 2 on Figure 2-5). This well was reportedly drilled in 1969 for use as a water supply well for the compressor station (Campbell, 1994). Following connection of the facility to the City of Roswell water distribution system, however, use of the well was turned

over to the Pecos Valley Artesian Conservancy District for monitoring water levels in the Roswell bedrock aquifer. Based on comparison of the drillers' log with the local stratigraphy, the well is completed in limestone of the San Andres Formation. The well is cased with 9⁵/₈-inch steel casing from the surface to a depth of 240 feet, and is open from 240 feet to the total depth of 352 feet. The depth to water as measured in December 1994 was 65 feet.

Several active and inactive irrigation and livestock wells are located between 1 and 2 miles east of the site (Figure 2-5). All of these wells are completed in the San Andres limestone aquifer. Given the distance to the downgradient wells and the presence of the aquitard between the alluvium and the bedrock aquifer, it is very unlikely that ground water from the compressor station could impact any of the active water supply wells.

3. PREVIOUS ENVIRONMENTAL INVESTIGATIONS

Several hydrogeologic investigations have been completed at the Roswell compressor station to characterize the extent of subsurface impacts near the former surface impoundments. The investigations have included:

- (1) a comprehensive soil vapor survey and soil coring program by HLA [1990],
- (2) a drilling and soil sampling program by Metric Corporation [1991],
- (3) installation of a monitor well by Halliburton NUS Environmental Corporation (Halliburton) [07/92],
- (4) installation of a hydrocarbon liquid recovery pump in monitor well MW-1 by Cypress Engineering Services (CES) [05/93],
- (5) a drilling and soil sampling program by Brown & Root Environmental (B&R) [06/93],
- (6) installation of an upgradient monitor well and sampling of the two nearest regional aquifer wells by Daniel B. Stephens & Associates (DBS&A) [12/94],
- (7) the completion of the "Phase I Soil and Ground Water Assessment" program which included the characterization of affected soil immediately beneath two former surface impoundments and the installation of three downgradient monitor wells by DBS&A [08/95], and
- (8) the completion of the "Phase II Soil and Ground Water Assessment" program which included the characterization of affected soil immediately beneath two additional potential source areas, the installation of several monitor wells, and the performance of an SVE pilot test by DBS&A [09/96].

The above listed investigations and the interim corrective action program have been undertaken in phases beginning in the spring of 1990 and continuing to the present. During this period extensive data have been collected regarding subsurface soils and ground water conditions at the site.

Sections 3.1 through 3.8 provide an accounting of each of the field investigations conducted to date, and Section 3.9 summarizes the extent of subsurface impacts resulting from past surface

impoundment operations. Table 3-1 provides a summary of all abandoned soil borings drilled at the site. Table 3-2 provides a summary of all soil borings completed as wells in the course of assessment activities. Summaries of analytical results obtained in the course of assessment activities are provided in Tables 3-3 through 3-11.

3.1 Harding Lawson Associates Shallow Subsurface Investigation (1990)

During the spring of 1990, a soil investigation was performed by HLA to investigate the presence of VOCs in the shallow subsurface in the vicinity of the former surface impoundments (HLA, 1991a). The HLA investigation included an extensive soil gas survey and a soil coring and sampling program.

During the soil gas survey, HLA collected a total of 812 soil vapor samples from the locations shown on Figure 3-1. Soil gas samples were collected from depths ranging from 2 feet to 36 feet by driving a soil vapor probe several feet ahead of the hollow-stem auger bit. Soil vapor samples were analyzed in a mobile laboratory by subcontractor Fahrenthold & Associates using a gas chromatograph equipped with an electron capture detector. Five target purgeable halocarbons were quantified, including 1,1,1-TCA, trichloroethene, perchloroethene, chloroform, and carbon tetrachloride.

The highest VOC concentrations were measured near the surface impoundments located in the northeast portion of the facility. The most frequently detected compound was 1,1,1-TCA, which was also detected at the highest concentrations (up to 372 ppmv). The areal distribution of 1,1,1-TCA at the 10-foot depth, as determined by HLA, is illustrated in Figure 3-2. The mass of vapor phase 1,1,1-TCA within the plume is estimated to be approximately 18 kg, assuming that the concentrations at the 10 foot depth apply to all soils from the surface to the water table at a depth of about 60 feet. This is equivalent to a volume of liquid 1,1,1-TCA of only about 3.5 gallons.

Following completion of the soil gas survey, HLA undertook a program of continuous coring and

soil sampling in order to validate the soil vapor survey results. A total of 11 borings were drilled to depths of up to 65 feet. Continuous 5-foot-long soil cores were collected using a hollow-stem auger drill rig. Figure 3-3 shows the location of each boring drilled by HLA. The soil samples were analyzed in the laboratory for a suite of selected VOCs, semivolatile organic compounds, total petroleum hydrocarbons (TPH), and toxicity characteristic leaching procedure (TCLP) metals. The results of these analyses are summarized in Tables 3-3 and 3-4.

Only a few of the HLA soil samples contained detectable concentrations of the target purgeable halocarbons. A soil sample collected from 35 to 37 feet deep in boring SB-9-07 near the surface impoundments contained the highest concentration of 1,1,1-TCA (2 mg/kg). This boring also contained somewhat higher concentrations of Freon-113, ethylbenzene, xylenes, and TPH.

In 4 of the 11 borings, HLA encountered perched water on top of a clay lens at approximately 30 feet bgs. The boreholes that contained water were near the utility garage and engine room (Figure 2-1). HLA postulated that the clay formed an aquitard with an undulating surface, thus allowing the water to pond within depressions in the upper surface of the clay.

3.2 Metric Corporation Shallow Subsurface Investigation (1991)

During July and November 1991, Metric Corporation drilled 20 additional soil borings to delineate the areal and vertical extent of the VOCs identified by HLA near the surface impoundments (Metric, 1991). The locations of borings drilled by Metric are shown on Figure 3-4. Soil borings were generally advanced to approximately 30 to 40 feet bgs in order to characterize soil type and to determine if VOCs were present above the uppermost clay unit. Only four soil borings were drilled to depths greater than 50 feet bgs (Table 3-1).

Metric collected soil samples using a continuous tube sampler, and each core was screened for the presence of VOCs using an organic vapor analyzer (OVA). Within a given soil core, the material with the highest concentration of organic vapors was submitted to the laboratory for analysis of the following constituents: TPH, benzene, toluene, ethylbenzene, and xylenes

(BTEX); and purgeable halocarbons by EPA Methods 418.1, 8020, and 8010, respectively. The results of these laboratory analyses are summarized in Table 3-3. Several of the borings contained TPH concentrations above the soil cleanup guidelines enforced by NMOCD.

Based on the analytical results, Metric estimated that the areal and vertical extent of VOC impacts extended approximately 240 feet east and approximately 100 feet north of the northeast property corner. The investigation further established that purgeable halocarbons are present to depths of at least 30 feet bgs near surface impoundments 1 and 2 (soil borings "Pit 1" and "Pit 2") and along the eastern fence line (soil boring SG86). In addition, some soil samples contained TPH concentrations of 100 mg/kg, or greater, to depths exceeding 27 feet in soil borings "Pit 1," "Pit 2," SG86, and OS BH-9.

Most borings drilled previously by HLA and Metric had penetrated a clay layer at approximately 30 feet bgs. However, clay was not encountered in soil boring "Pit 2" above about 68 feet bgs. This prompted Metric to conclude that a natural clay basin existed beneath the surface impoundments, with the sides sloping from the 30 to 40 foot depth around the perimeter, to approximately 70 feet bgs near the basin bottom.

However, subsequent drilling programs verified that the upper clay is, in fact, present at the 35 to 40 foot depth near the "Pit 2" soil boring, but is thinner and contains coarser sediments. The upper clay unit appears to grade laterally into a coarser zone of sandy clays near soil boring "Pit 2." Further, the clay unit identified at 67.9 feet bgs by Metric is actually part of the lower clay unit that underlies the entire site. This lower clay may lie near the contact between the valley-fill alluvium and the underlying Artesia Group Permian bedrock units (see Figure 2-2, Section 2.4).

Ground water was encountered at depths ranging from 37 to 57 feet bgs in 6 of the 20 borings drilled by Metric. Soil borings "Pit 2" and SG361 (Figure 3-4) contained thin perched water zones (1 to 6 feet thick) above fine-grained sandy clays which correspond to the upper clay unit. Approximately 1-foot of water was measured at the bottom of soil borings OS BH-8 and OS BH-

9 (Figure 3-4) at approximately 49 feet bgs. The water measured at the 49-foot depth may have migrated down the boreholes from the top of the upper clay unit. Finally, the ground water encountered at depths of about 55 feet bgs likely represents the water table of the uppermost aquifer, as these depths to water were generally reported in borings drilled to depths of approximately 70 feet bgs.

3.3 Halliburton NUS Corporation Monitor Well Installation (1992)

During July 1992, Halliburton installed one monitor well within the natural clay basin determined by Metric (Section 3.2) (Halliburton, 1992). The boring was drilled to a depth of 60 feet prior to sampling, at which point continuous samples were collected with a split-spoon sampler until a red clay layer containing very hard sulfate lenses was encountered at 68 feet bgs. Monitor well MW-1 was installed at the location depicted on Figure 3-5.

Following installation of MW-1, the well was developed by bailing and subsequently sampled for 8240 volatile and 8270 semivolatile organics, TPH, and total metals. The analytical results indicated that the ground water within monitor well MW-1 contained aromatic and halogenated hydrocarbons, as well as several semivolatile organic compounds. These results are summarized in Table 3-9 and Table 3-10.

3.4 Brown & Root Environmental Ground Water Assessment (1993)

In April 1993, B&R, a division of Halliburton, completed a limited assessment of ground water impacts resulting from disposal activities at the former surface impoundments (B&R, 1993). The investigation was undertaken to determine if two separate saturated zones existed within the alluvium and to establish ground water quality beneath the former impoundments.

As part of their investigation, seven soil borings were drilled, and four of these were completed as monitor wells. Figure 3-5 shows the locations of soil borings and monitor wells installed by B&R. Soil samples were collected from each boring using a split-spoon sampler or continuous

core barrel. The samples were screened for the presence of VOCs using an OVA. Unfortunately, the OVA was not functioning during the drilling of soil borings SB-4, SB-5, and SB-1C. Soil samples were collected above the two saturated zones and analyzed for TPH using EPA Method 418.1; the results are summarized in Table 3-3.

Perched water was not encountered above the upper clay unit during drilling of soil borings SB-1B, SB-2, SB-3, and SB-5 (Figure 3-5). However, phase-separated hydrocarbons (PSH) and water were encountered in soil boring SB-1A immediately above the upper clay layer at approximately 40 feet bgs. This boring was subsequently plugged and abandoned by B&R. Soil boring SB-4 encountered a small saturated zone in fractured limestone at approximately 47 feet bgs. This boring is located approximately 250 feet east of the property boundary, and the limestone probably corresponds to the top of the Artesia Group (Section 2.4).

B&R installed four monitor wells in the uppermost aquifer within soil borings SB-1B, SB-2, SB-3, and SB-5. The monitor wells, identified as MW-1B, MW-2, MW-3, and MW-5, were set at total depths ranging from 65 to 70 feet bgs (Table 3-2). The newly installed wells were then checked for the presence of PSH, developed, and sampled.

Approximately 4 feet of PSH was present on top of the water table in monitor wells MW-1B and MW-2. Ground water samples were collected from the two monitor wells without PSH (MW-3 and MW-5) and analyzed for TPH (EPA Method 418.1), volatile organics (EPA Method 624 and 8240), and total dissolved solids (EPA Method 160.1). The results of these analyses are summarized in Tables 3-9, 3-10, and 3-11.

B&R concluded that two water bearing zones were present in the alluvium and that both were impacted by VOCs. The two zones included (1) the upper thin zone of perched water on the upper clay unit (approximately 40 feet bgs) and (2) a deeper zone of saturated silty sand and sand at depths ranging from 55 to 65 feet bgs.

In June, 1993, B&R returned to the site to install PSH recovery wells in the upper water-bearing

zone above the upper clay unit. An additional seven borings were drilled near the surface impoundments, designated RB-1 through RB-7 (Figure 3-5). Only one of the seven additional borings contained perched liquids. The one boring which contained liquid (RB-7) was completed as recovery well RW-1 near monitor well MW-1 (Figure 3-5). Approximately 1.4 feet of PSH was measured in recovery well RW-1 following its construction.

3.5 Interim PSH Removal Program

On May 21, 1993, a recovery pump was installed in monitor well MW-1 by CES. During July, 1993, B&R installed recovery pumps in monitor wells MW-1B, MW-2, and RW-1. PSH and water are pumped from the recovery wells and routed to an aboveground storage tank pending final disposition.

During the fall of 1993, Brown and Caldwell (B&C) installed skimmers on each recovery pump to reduce the volume of water recovered. Prior to the installation of the skimmers, B&C measured PSH levels and ground water levels of approximately 58.5 and 62 feet bgs in monitor wells MW-1B and MW-2, respectively. The depth to water was approximately 38.6 feet bgs in recovery well RW-1, which contained approximately 0.06 feet of PSH at the time of measurement.

On March 23, 1994, CES removed an inoperative recovery pump from MW-1 and collected ground water samples from monitor wells MW-3 and MW-5. On April 15, 1994, B&R installed a pneumatic product recovery pump and skimmer in monitor well MW-1. At that time B&R measured the following depths to PSH and to ground water in the four wells containing PSH:

Well	Date	Total Depth of Well (feet)	Depth to PSH ¹ (feet)	Depth to Water ¹ (feet)	PSH Thickness (feet)
MW-1	04-15-94	68.0	53.30	61.54	8.24
MW-1B	04-15-94	65.5	58.42	61.30	2.88
MW-2	04-15-94	65.0	58.68	61.50	2.82
RW-1 ²	04-15-94	42.5	38.70	39.00	0.30

¹ Depth in feet below top of casing.

² Recovery well RW-1 is completed in the perched water zone.

More recent measurements of PSH levels and ground water levels were obtained in May, 1996.

These measurements are summarized below:

Well	Date	Total Depth of Well (feet)	Depth to PSH ¹ (feet)	Depth to Water ¹ (feet)	PSH Thickness (feet)
MW-1	05-31-96	68.0	no PSH	63.75	0
MW-1B	05-31-96	65.5	59.03	59.10	0.07
MW-2	05-31-96	65.0	no PSH	59.15	0
RW-1 ²	05-31-96	42.5	39.20	39.25	0.05

¹ Depth in feet below top of casing.

² Recovery well RW-1 is completed in the perched water zone.

Note that these measurements were obtained immediately after the recovery pumps were turned off and therefore do not represent static conditions. Additional information regarding the depth to water and thickness of PSH measured in the four recovery wells is summarized in Table 3-8.

3.6 Daniel B. Stephens & Associates, Inc. Subsurface Investigation (1994)

Following correspondence and discussions between NMED and Transwestern, DBS&A performed a limited field investigation during November and December 1994. Upgradient monitor well MW-6 was installed approximately 500 feet southwest of the location of the former surface impoundments (Figure 2-1). The MW-6 boring was drilled using a hollow-stem auger to

a depth of 80 feet, and the well is screened from 60 to 75 feet bgs. Soil samples were collected at 5-foot intervals during drilling, and field headspace measurements using a PID did not detect the presence of VOCs in any of the soil samples.

The alluvial sediments penetrated during drilling of MW-6 were generally consistent with those observed in previous borings; that is, they consisted predominantly of sandy gravel and sand from the surface to a depth of 60 feet and silty clay and clayey sand from 60 to 75 feet. A gravelly sand of unknown thickness was penetrated at the 79-foot depth in this boring; however, the red plastic clay reported in previous borings was not encountered.

A ground water sample from MW-6 and a soil sample from the same boring collected from a depth corresponding to the water table were submitted for laboratory analysis of VOCs and TPH. Both the soil and the ground water sample exhibited no detectable concentrations of 8010/8020 VOCs or TPH determined by method 418.1.

In order to allow a better estimate of the ground water flow direction and gradient within the shallow alluvium, the elevations and coordinates of all on-site monitor wells were resurveyed on December 1, 1994. The well locations and elevations based on this survey are provided in Table 3-2.

Depths to water were measured in on-site monitor wells MW-3, MW-5, and MW-6 on December 4, 1994 and again on December 22, 1994. Ground water flow directions calculated for the two dates of measurement were approximately N34E and N32E, respectively, indicating that ground water in the shallow alluvium flows to the north-northeast in the vicinity of the former impoundments.

In addition to the sampling and analysis of MW-6, ground water samples were also collected from on-site deep well TW-1 (Figure 2-1) and off-site deep well #5 (Figure 2-5). Well #5 was selected as representative of background upgradient water quality within the San Andres bedrock aquifer. The ground water samples from these two wells were analyzed for a modified Appendix

IX suite of constituents.

These results indicate that both deep wells yield very hard ground water of relatively high salinity. Well #5 contains high concentrations of sulfate (768 mg/L), chloride (750 mg/L), and TDS (2420 mg/L). These values significantly exceed the New Mexico ground water standards for sulfate (600 mg/L), chloride (250 mg/L), and TDS (1000 mg/L). The ground water sample collected from Transwestern well TW-1, although of somewhat lower salinity, still exceeds the New Mexico standards for chloride and TDS, with reported concentrations of 631 mg/L and 1290 mg/L, respectively. In addition, deep well TW-1 also contained elevated concentrations of iron (4.22 mg/L) and manganese (0.39 mg/L), which exceed the New Mexico ground water standards for these elements of 1.0 mg/L and 0.2 mg/L, respectively.

The high salinity of the ground water from TW-1 and Well #5 is almost certainly natural and probably results from dissolution of soluble evaporite minerals within the upper Fourmile Draw Member of the San Andres Formation, as discussed in Section 2.4. The high salinity of the ground water in the bedrock aquifer in this vicinity may also account for the fact that many of the production wells are no longer in use.

Appendix IX VOC analyses of the ground water samples collected from the two deep wells revealed no detectable concentrations of any of these compounds. In addition, the sample from TW-1 was analyzed for Appendix IX SVOCs, and the only compound detected was bis(2-ethylhexyl)phthalate (0.018 mg/L). The phthalate esters are well-known laboratory contaminants used as plasticizers in most flexible plastic products, such as the plastic beakers and tubing used in many laboratory applications. EPA has acknowledged this compound as a common laboratory contaminant (EPA 1988, 1991). Therefore, the reported detection of this compound is probably the result of laboratory handling of the sample; it is almost certainly not present in the ground water, as no other organic compounds were detected in the sample.

3.7 Daniel B. Stephens & Associates, Inc. Subsurface Investigation (1995)

In August, 1995, Daniel B. Stephens & Associates (DBS&A) completed a "Phase I" soil and ground water assessment program. The primary objectives of this program were to characterize affected soil immediately beneath the two confirmed former surface impoundments, Pit 1 and Pit 2, and to characterize affected ground water downgradient of the former impoundments. During the course of this program, eight soil borings were drilled, monitor wells were installed in three of the borings, hydraulic tests were conducted, fluid levels were measured, and samples were collected for laboratory analysis.

Since the location of Pits 1 and 2 are known with relative certainty from examination of aerial photographs, two soil borings were drilled within each of these two areas at the locations shown on Figure 3-6. The most highly affected soil was selected from each boring for laboratory analysis. These samples were selected based on visual examination and field headspace screening with a PID. Native soils were encountered at approximately 12 to 14 feet below ground surface within the former surface impoundments. In general, this depth also corresponded with the depth of the most highly affected soils for which soil samples were collected for analysis.

The Pit 1 and Pit 2 area soil samples were analyzed by Core Laboratories for TPH, VOCs, SVOCs, PCBs, metals, cyanide, and sulfide. A summary of detected constituents is presented in Tables 3-5, 3-6, and 3-7. As indicated, the soil samples from immediately beneath the former surface impoundments contain primarily petroleum hydrocarbons and small quantities of VOCs and SVOCs. TPH concentrations ranged from less than 50 mg/kg up to 26,000 mg/kg. Based on proposed soil screening levels (U.S. EPA, 1994), the primary organic compounds at issue are benzene, toluene, 1,1-DCE, PCE, and 1,1,1-TCA. In addition, EPA Region III has developed toxicological and risk-based concentrations for soil ingestion (U.S. EPA, 1995), of which none of the Pit 1 and Pit 2 soil samples exceed the concentration for VOCs, SVOCs, PCBs, or metals.

During the off-site portion of the investigation, DBS&A collected 13 additional soil samples for analyses from four soil borings which were drilled at locations in the downgradient direction from the former impoundments (Figure 3-6). Core Laboratories analyzed off-site soil samples for VOCs, and a selected list of metals. A summary of detected compounds and metal concentrations

is presented in Tables 3-5, 3-6 and 3-7. VOC concentrations were below the detection limit for each soil sample with the exception of methylene chloride, which was also present in the laboratory method blank.

Ground water monitor wells were installed in three of the four off-site soil borings (Figure 3-6). A monitor well was not installed in the northernmost soil boring (labeled MW-7ABD on Figure 3-6) because ground water was not encountered at this location at the depth of the uppermost aquifer.

Depths to water were measured in on-site monitor wells MW-3, MW-5, and MW-6 and in off-site monitor wells MW-7, MW-8, and MW-9 on September 15, 1995. These measurements indicated that ground water in the shallow alluvium flows to the northeast in the vicinity of the former impoundments. The dimensionless ground water gradient calculated using the September 15, 1995, data is 0.015.

Ground water samples were collected from the three new downgradient monitor wells (MW-7, MW-8, & MW-9) and from three existing monitor wells (MW-3, MW-5, & MW-6). Samples were analyzed by Core Laboratories for VOCs, SVOCs, organochlorine pesticides/PCBs, metals, cyanide, sulfide, and major ions. A summary of detected constituents is presented in Tables 3-9, 3-10, and 3-11. The only detected organic compounds were benzene at 0.006 mg/L in monitor well MW-8 and methyl ethyl ketone and methyl methacrylate at 0.900 and 0.005 mg/L, respectively, in monitor well MW-7. The inorganic chemical analyses indicate that ground water samples from each well, including upgradient monitor well MW-6, exceed the NMWQCC ground water standards for total dissolved solids, chloride, and sulfate. The generally poor water quality of the uppermost aquifer in the vicinity of the site is natural and is likely due primarily to the presence of gypsum beds within the alluvium and underlying Artesia Group.

During well development, DBS&A conducted bail-recovery tests on newly installed wells MW-7, MW-8, and MW-9 and redeveloped wells MW-3 and MW-5. The five tests were conducted to obtain estimates of the in-situ hydraulic conductivity of the uppermost aquifer. The estimated

values for hydraulic conductivity ranged from 0.03 to 0.85 ft/day with a geometric mean of 0.1 ft/day.

3.8 Daniel B. Stephens & Associates, Inc. Subsurface Investigation (1996)

In September, 1996, Daniel B. Stephens & Associates (DBS&A) completed a "Phase II" soil and ground water assessment program. The objectives of the Phase II investigation were to (1) evaluate two additional potential source areas, (2) further delineate the lateral and vertical extent of affected soil and ground water, and (3) assess whether soil vapor extraction (SVE) is a viable remedial technology for the site. During the course of this program, the following activities were completed:

- Five borings (SG86-1 through SG86-4 and MW-13 in Figure 3-6) were advanced, one of which was converted to a monitor well, near a suspected source area referred to as SG86.
- Five borings (Pit 3-1 through Pit 3-5 in Figure 3-6) were advanced near a suspected source area referred to as Pit 3.
- Nine borings (MW-10 through MW-19 in Figure 3-6, excluding MW-13) were advanced below the water table of the uppermost aquifer, and monitor wells were constructed and developed in each of these borings.
- Five soil borings (SVE prefix in Figure 3-6) were advanced and three of the borings were converted to SVE wells near the periphery of former surface impoundment Pit 1.
- Soil samples were collected from each of the above borings for field and laboratory analyses.
- Fluid levels were measured in all existing and newly installed wells to evaluate ground-water flow directions.

- Fourteen monitor wells were sampled and analyzed for inorganic and organic constituents.
- Six SVE performance tests of various durations were conducted.

Assessment of soils in the SG86 and Pit 3 areas indicates that these two areas are not likely sources of ground-water contamination. The elevated levels of TPH and VOCs reported by Metric at the former SG86 soil boring location are most likely present due to the lateral migration of liquids from the former Pit 1 surface impoundment. In general, the soil impacts in these areas are minimal.

Phase II assessment activities confirmed that ground water beneath the site is generally present near the base of the alluvium at approximately 50 to 65 feet bgs. The base of the alluvium is characterized by abundant gypsum beds. Ground-water flow directions are complex with variable hydraulic gradients and discontinuous water-bearing zones as shown by the anomalous water level elevations in Figure 3-10.

Ground water samples were collected from six of the previously installed monitor wells and eight of the ten additional monitor wells. Monitor well MW-16 was not sampled due to the presence of PSH and monitor well MW-18 was not sampled due to the absence of water. The analyses of ground water samples indicates that BTEX constituents are the primary constituents of concern. Summaries of analytical results for ground water samples are included in Tables 3-9, 3-10, and 3-11. Based on benzene concentrations, the estimated extent of ground-water impacts covers an area of approximately 600 feet by 350 feet (Figure 3-18). At this point, the extent of actionable ground-water impacts north of monitor well MW-12 and south of MW-16 have not been fully defined. This will be addressed by the proposed Phase III assessment activities described in Section 5.

The SVE borings advanced along the periphery of Pit 1 indicate that soil impacts are limited primarily to the area above the clays present at approximately 30 feet bgs.

The SVE performance test determined that an SVE remedial system can be used to remove hydrocarbon contamination from the soils present at the site. Tests were conducted at air flow rates ranging from approximately 15 to 40 cfm and vacuums of 25 to 160 inches of water. The estimated effective radii of influence ranged from 80 feet to 90 feet in both the lower clayey soils and in the upper zone.

The laboratory detected low concentrations of PCBs in five soil samples collected in the course of the Phase II activities. Laboratory identification of PCBs is based on a "best fit" analysis of chromatographic peak patterns and retention times. Due to chemical weathering and matrix interferences, the identification process can be rather subjective. Prior to the Phase II investigation, PCBs had not been detected in the residual waste or soils surrounding Pits 1 and 2. However, during this investigation the PCB Aroclor 1254 was detected in five otherwise clean samples. A mechanism for transport of PCBs to depths of 60 feet bgs has not been determined and would not reasonably be anticipated in the absence of an identified source or carrier medium (that is, PCBs in the absence of elevated levels of TPH). Additional analysis will be completed in the future to confirm the absence of PCBs.

3.9 Extent of Soil and Ground Water Contamination

The investigations completed to date and described in Sections 3.1 through 3.8 have been conducted to characterize the subsurface hydrogeology and the distribution of VOCs in the soils and ground water beneath the former surface impoundments. Figure 3-7 shows the locations of all borings and monitor wells installed to date. The contaminants detected consist primarily of petroleum hydrocarbons that are typical components of pipeline condensate, which was formerly held in the surface impoundments. Tables 3-3 through 3-11 provide summaries of the organic and inorganic constituents detected in soils and ground water during each of the previous investigations.

Sections 3.9.1 through 3.9.3 summarize the findings of the investigations discussed above.

3.9.1 Site Hydrogeology

The Quaternary sediments beneath the impoundments consist of interbedded cobbles, gravel, sand, silt, and clay to depths of approximately 70 feet bgs. The lithology of the alluvium is consistent with the descriptions provided by Lyford (1973). Generalized hydrogeologic cross sections of the sediments underlying the impoundments constructed along an east-west line (A-A' in Figure 3-6) and a north-south line (B-B' in Figure 3-6) are provided in Figure 3-8 and Figure 3-9, respectively. Soil types in Figure 3-8 and Figure 3-9 are defined using the Unified Soil Classification System. The hydrogeology underlying the site is as follows:

- From the ground surface to depths of approximately 30 to 35 feet bgs, brown gravelly sands and clays are present. Perched water has occasionally been encountered within the bottom few feet of this interval.
- At depths of approximately 35 to 60 feet, light brown to reddish-colored interbedded silts, sands, and clays are encountered. The fine-grained clay lenses serve as perching layers for the downward moving fluids and likely represent interfingering deposits of limited lateral extent.
- At depths of approximately 60 to 70 feet, saturated silty sands and sands are present. This zone is referred to as the uppermost aquifer.
- At approximately 70 feet, a red plastic clay of unknown thickness is present. This unit probably represents the transition from the Quaternary alluvium to the Permian-age bedrock of the Artesia Group.
- As discussed in Section 2.5, the background water quality in the shallow alluvial aquifer

is very poor in the vicinity of the site due to the presence of gypsum beds beneath the alluvium. TDS concentrations exceed 3000 mg/L in on-site monitor wells MW-3 and MW-5 (Table 3-11). These two wells do not appear to be impacted by site activities; rather, the elevated TDS concentrations in these wells simply reflect the poor background quality of ground water in the region.

The determination of ground water flow direction in the alluvium underlying the former impoundments is complex as shown by the anomalous water level elevations in Figure 3-10, variable hydraulic gradients, and discontinuous water-bearing zones.

3.9.2 Soil Impacts

Based on field OVA measurements and analytical chemistry results, elevated VOC concentrations in soil appear to encompass an area of approximately 600 feet by 400 feet centered between the two former surface impoundments. Figure 3-12 shows the estimated areal extent of impacted soil in excess of 100 mg/kg TPH. Similar figures are shown for the estimated areal extent of soil containing detectable concentrations of benzene, 1,1,1-TCA, 1,1-DCA, and PCE in Figures 3-13 through 3-16, respectively.

Near the former surface impoundments, the vertical extent of impacted soils extends from approximately land surface to the uppermost aquifer at approximately 60 feet. The vertical extent of impacted soil decreases as one moves laterally away from the surface impoundments. Due to local soil heterogeneities, it appears that VOCs have spread out along preferential pathways on top of the clay lenses at the 30- to 40-foot depth, prior to continued downward migration to the uppermost aquifer.

A generalized cross-sectional profile of impacted soils is shown in Figure 3-11; Figure 3-7 shows the location of the cross section. The estimated distribution of impacted soils is based both on field organic vapor analyzer readings and soil TPH concentrations as determined in the laboratory.

3.9.3 Ground Water Impacts

The following VOCs have been detected in monitor well MW-2: benzene (6500 ppb), toluene (15000 ppb), ethyl-benzene (2100 ppb), and total xylene (13000 ppb). However, it is important to note that this monitor well also contained phase separated hydrocarbon at the time the sample was collected and therefore the results for this sample may overstate the actual concentration of dissolved phase BTEX constituents in affected ground water.

Ground water analysis results from monitor well MW-1 detected the following organic constituents: benzene (370 ppb), toluene (61 ppb), ethyl-benzene (110 ppb), o-xylene (120 ppb), p-m xylene (820 ppb), 1,1,1, TCA (180 ppb), 1,1, DCA (560 ppb), 2-butanone (MEK) (220 ppb), naphthalene (34 ppb), 2-methyl-naphthalene (51 ppb), and 4-methyl-phenol (250 ppb). This monitor well also contained phase separated hydrocarbon at the time the sample was collected.

The lateral extent of VOCs appears to be bounded on-site by monitor wells MW-3, MW-5, and MW-10. The ground water plume extends off-site to the north beyond the location of monitor well MW-12 and is bounded off-site to the northeast and east by monitor wells MW-7, MW-14, MW-15, and MW-17. A summary of the analytical results from water sampling events can be found in Tables 3-9, 3-10, & 3-11. The lateral distribution of benzene detected in ground water samples collected in the course of the Phase II assessment activities is shown in Figure 3-18. In addition, the lateral distribution of 1,1,1-TCA detected in ground water samples collected in the course of the Phase II assessment activities is shown in Figure 3-19. It is important to note that halogenated constituents (such as 1,1,1-TCA and 1,1-DCA) have not been detected in any ground water samples with the exception of the initial ground water sample collected from monitor well MW-1.

The measurable thickness of PSH present in four wells indicates that the estimated extent of PSH covers roughly a 550-foot by 150-foot area (roughly 2 acres) as indicated in Figure 3-17.

4. SOIL ASSESSMENT PLAN

A phased approach has been and will continue to be used to assess the nature and extent of soil contamination resulting from past usage of the former surface impoundments.

4.1 Phase I Characterization of Affected Soil

Contaminant source area characterization, Phase I, was completed during the August, 1995, assessment activities and consisted of precisely locating the former impoundments identified as Pit 1 and Pit 2 and characterizing affected soil through laboratory analyses. A Phase I Soil and Ground Water Assessment Report (DBS&A, 1995) was subsequently prepared and submitted to the NMED. Constituents identified from the contaminant source area characterization have been used to develop a soil and ground water sample analysis plan for the Phase III assessment activities.

4.2 Phase II Characterization of Affected Soil

A Phase II Soil and Ground Water Assessment Plan (DBS&A, 1995) was completed in September, 1996. The primary objective of this plan, as it relates to the characterization of affected soil, was to characterize potentially affected soil beneath the location of a suspected former impoundment identified as Pit 3 and potentially affected soil located near the previous soil boring location SG-86. A second objective was to more closely define the lateral extent of affected soil in the vicinity of the former surface impoundments. A third objective was to evaluate the effectiveness of soil vapor extraction (SVE) as a potential remediation method for affected soil.

4.3 Phase III Characterization of Affected Soil

The primary objective of this plan is to complete characterization of potentially affected soil.

4.3.1 Characterization of Affected Soil for Remedial Measures Study

One or more samples of the most highly affected soil from within the former Pit 1 area will be obtained for bench scale tests. The bench scale tests will be performed by selected remediation contractors, such as, contractors that provide soil washing, solvent extraction, and soil stabilization services.

The sample size required has not yet been fully defined, however, Transwestern anticipates that the sample size will be on the order of one 55-gallon drum or less. These samples will be collected using conventional excavation equipment such as a backhoe.

4.3.2 Determination of Site-Specific Background Metals Concentrations in Soil

Several of the metal constituents detected in soil samples collected in the course of prior assessments are also known to occur naturally in soil. Therefore, in order to objectively evaluate laboratory analyses for metal constituents in potentially affected soil samples, Transwestern will collect soil samples in the course of the Phase III assessment program for the determination of site specific background concentrations of selected metal constituents. The background sampling program has been developed with guidance from two sources: 1) *EPA Soil Screening Guidance: Fact Sheet* (U.S. EPA, 1996); and 2) *Texas Risk Reduction Program Appendix IV: Draft Guidance on Background Sampling for Soils and Determining Sample Size* (TNRCC, 1996).

4.3.2.1 Excluded constituents

Generally, at sites where contaminant concentrations fall below performance levels, no further action or study is warranted (U.S. EPA, 1996). Laboratory analyses performed on soil samples collected from the most highly affected areas of the site indicate that the metal constituents Ni, Ag, Sn, V, and Zn have not been detected above the proposed performance standards for these constituents (Table 7-1). In addition, based on Transwestern's knowledge of the types of materials stored in the former surface impoundments, there is no reasonable expectation that any

of these five metal constituents might be present as significant contaminants. Therefore, no further analyses of soil samples will be performed for these constituents and no attempt will be made to determine background concentrations.

4.3.2.2 Constituents subject to evaluation

The background soil concentration will be determined for each metal constituent: 1) for which at least one sample has been observed in excess of the proposed performance standard; and 2) for each potential metal constituent of concern for which no observation has yet been made. Therefore, background soil concentrations will be determined for the following metal constituents: Al, Sb, As, Ba, Be, Cd, Cr (total), Cr (VI), Co, Cu, Pb, Hg, Se, and Tl.

4.3.2.3 Soil sampling program

Number/frequency of samples

Transwestern will obtain 16 soil samples from 8 locations (two samples from each location) which are presumed to be uncontaminated by facility operations. Each sample will be delivered to a laboratory for analysis for each of the 14 metal constituents subject to evaluation. Analytical methods will follow those prescribed in Table 6-1.

Location/depths of samples

The proposed surface locations and sampling depths were selected based on the following guidance: 1) The background sampling domain (the area to be sampled) should be as close as possible to the same size as the area that is impacted; 2) Sample points for background samples should be selected in at least two rows around the contaminated site; and 3) Typically, sample locations should be at least 25 ft. apart and spaced evenly around the site (TNRCC, 1996).

The eight surface locations selected are indicated in Figure 4-1 as proposed soil borings BS-1 through BS-8. Two samples will be collected from each boring from the interval of 10-14 feet below ground surface. This sampling depth was chosen to correspond with the depth of the most highly affected soil in the immediate vicinity of the former impoundments.

Strong consideration was given to the selection of surface sample locations farther removed from the former impoundment area. However, prior soil assessment activities have clearly indicated that the near surface alluvial sediments in the vicinity of the site vary considerably within relatively short distances, laterally as well as vertically. As a result, although samples collected from locations farther removed from the former impoundment area would more assuredly produce "clean" samples, these samples would much more likely not be representative of affected soil in their elemental makeup. Therefore, Transwestern has chosen to propose background sample locations at a relatively close distance to the former impoundments and to impose certain criteria on the use of sample data as discussed below.

In order to better assure only "clean" samples are utilized in the determination of background concentrations, Transwestern also proposes to collect a sample from each location which will be submitted to a laboratory for determination of TPH by method 418.1. Prior soil assessment activities have indicated that near surface soils (that is, < 15 ft. bgs) outside the immediate vicinity of the former impoundments have been relatively free of organic contaminants. Furthermore, inorganic contaminants would not reasonably be expected to be present at this site in the absence of organic contaminants. Therefore, any samples collected from a location which also contain a reported TPH concentration > 50 mg/kg will be excluded from the dataset for determination of background concentrations. In addition, precautions will be exercised in the course of the field activities to avoid surface sample locations in potential storm water drainage areas and areas where facility operations were suspected to have taken place.

Sample collection methods

Soil sampling will be performed by hollow stem auger drilling techniques and a split-barrel sampler as described in Section 4.5 of this document.

4.3.2.4 Determination of Mean and Variance

The mean and variance will be determined for each of the 14 metal constituents using the analytical data obtained from the 16 background samples (excluding those which might exceed

the TPH criteria for use). For data evaluation purposes, below detection limit (BDL) results will be represented with a value equal to 50% of the detection limit.

4.3.3 Further Delineation of Affected Soil

No additional soil borings with the primary objective of delineation of affected soil are proposed to be included with the Phase III activities. However, four soil borings will be advanced and subsequently completed as ground water monitor wells in the course of the Phase III ground water assessment activities designed to delineate the extent of affected ground water. Soil sampling procedures for these activities are outlined in Section 5.3.1.

4.4 Subsequent Phases of Soil Assessment

Subsequent phases of soil assessment beyond Phase III activities are not anticipated. However, if necessary, subsequent phases will be completed in order to fully delineate the lateral and vertical extent of affected soil which may require corrective action. Prior to any additional assessment activity, Transwestern will develop and submit an assessment plan to the NMED for review and comment. Subsequent assessment plans will be similar in form and scope to the Phase II and Phase III assessment plans and, in general, will include:

- a clear statement of the objectives
- a description of the assessment strategy and methods to be employed
- a diagram indicating the locations of additional soil borings
- a sample collection and analysis plan
- a schedule for implementation and completion of the assessment activities.

4.5 Soil Sampling Procedures

4.5.1 Soil Sampling Procedures During Phase III Assessment

During the Phase III soil assessment activities, soil sampling will be performed by hollow stem auger drilling techniques and a split-barrel sampler (with the exception that the sample collected for treatability study will be collected using a backhoe in order to obtain sufficient volume). The split-barrel sampler will be driven into the soil using the rig-mounted drive hammer with uniform drive-pressure/drop-height. Blow counts will be recorded for all split-barrel drives. Following retrieval from the borehole, the split-barrel sampler will be opened and the soil material described according to SOP 13.3.2. A subsample of the material will be placed in a ziplock plastic bag for field headspace screening for VOCs using a PID.

4.5.2 Soil Sampling Procedures During Subsequent Assessment Activities

Soil sampling procedures employed during subsequent assessment activities will be detailed within the assessment plan for those activities.

4.5.3 General Procedures for Sample Container Labeling and Shipping

All sample containers will be labeled using waterproof ink. Label information will include the sampling location, depth interval, sampling date and time, type of analysis requested, project number, and the initials of the sampler. The containers will be sealed and placed in clear plastic bags. The sealed containers will be put into coolers on bags of ice or frozen ice packs. Plastic bubble pack or other suitable packing material will be used to protect the samples during shipping. Chain-of-custody forms will be completed for each sample shipment as described in Section 6.5.

Field personnel will ship the sample coolers to the laboratory using an overnight courier service. The fastest possible shipping method will be used, and all sample shipments will be carefully

tracked to ensure that samples arrive intact and that all holding times are met.

4.6 Borehole Abandonment Procedures

All soil borings which are not completed as a ground water monitor well will be abandoned in accordance with SOP 13.4.4, Well and Boring Abandonment.

4.7 Decontamination Procedures

All non-disposable field equipment that may potentially come in contact with any soil sample will be decontaminated in accordance with SOP 13.5.2, Decontamination of Field Equipment, in order to minimize the potential for cross-contamination between sampling locations. Clean latex or plastic gloves will be worn during all decontamination operations. The following sequence of decontamination procedures will be followed prior to each sampling event:

1. Wash all down-hole equipment in a solution of non-phosphate detergent (Liquinox[®]) and distilled/deionized water. All surfaces that may come into direct contact with the soil sample will be washed. Use a clean Nalgene[®] tub to contain the wash solution and a scrub brush to mechanically remove loose particles.
2. Rinse the equipment twice with distilled/deionized water.
3. Allow the equipment to air dry prior to the next use.

The drill rig and all down-hole equipment will be steam-cleaned and allowed to air dry between borings.

4.8 Management of Investigation-Derived Wastes

All contaminated media (soil and ground water) which are managed at the site, including

investigation derived waste (IDW), which contain hazardous constituents at a concentration above the performance standards set forth in Sections 7.2 and 7.3 of this CAP, yet which do not exceed any Toxicity Characteristic Leaching Procedure (TCLP) constituent concentration levels under the Hazardous Waste Management Regulations (20 NMAC 4.1) may either: 1) be treated on-site to reduce the concentration of hazardous constituents within the media to the levels set forth as performance standards within this CAP; or 2) be disposed of off-site as non-hazardous wastes in accordance with all other applicable laws and regulations.

Liquid wastes generated and contained during decontamination of drilling and sampling equipment will be drummed and labeled to identify the contents, date of generation, and amount of material generated. All waste containers generated during assessment activities will be stored in a designated drum storage area within the facility. If the water is determined to be hazardous, it will be filtered through an activated carbon filtration system. A verification sample of each potential waste stream that has been filtered will be analyzed by the appropriate analytical method to test for the characteristics by which the water was determined to be hazardous. Upon verification that the water is clean, it will be released to the ground surface on-site. If the water after verification sampling shows concentrations of constituents above any applicable federal, state, and or local regulations then the remaining waste will be disposed of according to applicable regulations. Used carbon filters will be disposed of properly pending analytical results.

Hydrocarbon contaminated soils, as determined by field headspace screening (PID headspace measurement > 100 ppmv), will be segregated from soils determined by field screening not to be contaminated (PID headspace measurement < 100 ppmv). Soils segregated by field screening techniques will await analytical results before a hazardous waste determination is made. Clean soil will be disposed of on-site by spreading soil cuttings on the ground surface. Soil determined to be characteristically hazardous will be shipped for off-site disposal at a permitted RCRA disposal facility.

PPE and dry waste associated with these activities will be disposed of in a sanitary landfill.

4.9 Reporting Requirements

Following completion of the Phase III soil assessment, and all subsequent soil assessments, the results of the assessment activities will be summarized in a report submitted to the NMED along with copies of the laboratory results for the soil samples analyzed.

The report submitted after each assessment will include the following information, as applicable:

- a descriptive summary of work conducted and general conclusions
- soil boring logs, including:
 - 1) boring number
 - 2) dates drilling began and finished
 - 3) driller's name and company
 - 4) drill rig type
 - 5) bit/auger size
 - 6) borehole diameter
 - 7) total depth drilled
 - 8) depths sampled
 - 9) lithologic logs
- field screening results, including:
 - 1) boring number
 - 2) sample depth - interval
 - 3) sample date
 - 4) instrument type & detection limit
 - 5) any pertinent field notes
 - 6) sample results
- soil sampling information, including:
 - 1) boring number
 - 2) sample depth - interval
 - 3) sample date

- 4) any pertinent field observations
 - 5) sample parameters/methods
 - 6) sample container types
 - 7) sample handling procedures
 - 8) copy of chain of custody
 - 9) sample results & detection limits
 - 10) any pertinent QA/QC information
- comparison of constituents detected with action levels and/or background levels and any QA/QC concerns
 - cross-sections shall be constructed throughout source areas from both N-S and E-W directions using definable stratigraphic units which can be correlated according to:
 - 1) particle size
 - 2) mineral composition
 - 3) and/or overall texture
 - map(s) showing the concentrations and horizontal extent of contamination for key hazardous constituents identified from laboratory analysis
 - a summary of the nature, rate, and extent of soil contamination at the site.

5. GROUND WATER ASSESSMENT PLAN

Concurrent with the ongoing soil assessment, a phased approach has been and will continue to be used to assess ground water contamination resulting from releases from the former impoundments. The objectives of the ground water assessment plan are as follows:

- Determine if additional interim stabilization measures (ISM) are required
- Establish the extent of contamination within the uppermost aquifer
- Confirm that deeper aquifers have not been affected by the release from the former surface impoundments
- Continue to refine the current understanding of ground water flow direction(s), vertical and horizontal hydraulic gradient, and velocity(ies)
- Determine aquifer hydraulic parameters for ground water flow and contaminant transport calculations.

The current ground water monitoring network consists of nineteen wells completed within the uppermost aquifer and one well completed within a perched zone (Figure 3-6). Information collected from additional monitor wells will help to refine the current picture of ground water flow direction, and the nature, rate, and extent of ground water contamination in the uppermost aquifer.

A deeper monitor well will be needed to determine the vertical extent of contamination. The installation of a deeper monitor well will follow the same investigative approach as the shallower ground water monitor well installation and assessment activities.

5.1 Phase I Ground Water Assessment

The Phase I ground water assessment was completed during the August, 1995, assessment activities. This assessment included the following tasks related to ground water assessment:

- installation and development of three ground water monitoring wells downgradient of the former impoundments (Figure 3-6)
- redevelopment of existing monitor wells MW-3, MW-5, and MW-6
- installation of dedicated sampling pumps in existing monitor wells MW-3, MW-5, and MW-6 and in the new monitor wells MW-7, MW-8, and MW-9
- sampling of all new and existing monitor wells
- aquifer tests to estimate hydraulic conductivity
- water level measurements were obtained in the new and existing monitor wells in order to establish the ground water flow direction and gradient.

A Phase I Soil and Ground Water Assessment Report (DBS&A, 1995) was subsequently prepared and submitted to the NMED.

The three additional downgradient ground water monitor wells appeared to indicate that the lateral extent of affected ground water is very limited.

5.2 Phase II Ground Water Assessment

The Phase II ground water assessment was completed during the September, 1996, assessment activities. This assessment included the following tasks related to ground water assessment:

- installation and development of ten ground water monitoring wells (Figure 3-6)
- installation of dedicated sampling pumps in six of the new monitor wells
- sampling of all new and existing monitor wells
- water level measurements were obtained in the new and existing monitor wells in order to establish the ground water flow direction and gradient.

A Phase II Soil and Ground Water Assessment Report (DBS&A, 1996) was subsequently prepared and submitted to the NMED.

The ten additional ground water monitor wells appear to confirm that the lateral extent of PSH and affected ground water is very limited. Transwestern will further confirm this by completing the scope of the Phase III assessment.

5.3 Phase III Ground Water Assessment

The primary objective of this plan, as it relates to the characterization of affected ground water, is to complete the delineation of the lateral extent of affected ground water in the uppermost aquifer. In addition, a second objective of this plan is to install a deeper ground water monitor well into the regional aquifer in order to confirm that this aquifer has not been affected by the release from the former impoundments.

5.3.1 Further Delineation of Affected Ground Water in the Uppermost Aquifer

Three ground water monitor wells will be installed in the uppermost aquifer to further delineate the extent of the dissolved-phase plume near the former impoundments. The proposed location of these three wells is indicated in Figure 4-1. In addition to the three wells indicated in Figure 4-1,

as many as three additional monitor wells may be installed if warranted based on field observations.

Prior to well installation, soil borings will be drilled to the total depth, approximately 10 feet below the water table, at each location with minimum 6-inch-O.D. augers. Soil samples will be collected at 10-foot intervals during the drilling of the pilot hole and field headspace screening will be performed using a PID, as described in Section 4.5.1. Two samples from each boring will be collected for laboratory analyses; the sample collected from a depth nearest to the capillary fringe of the uppermost aquifer (or at total depth if water is not present in the soil boring) and the sample which indicates the greatest field headspace screening measurement. These samples will be submitted for analyses for TPH, VOCs, SVOCs, and selected metals (those metals listed in Section 4.3.2.2). Soil grab samples will also be collected periodically during drilling to better define the geologic conditions at the site. All soil samples will be collected in accordance with SOP 13.3.2, Soils Logging, Sampling, Handling, and Shipping for Geotechnical and Chemical Analyses.

The monitor wells will be installed within the hollow-stem augers following the completion of the soil boring. Immediately prior to well construction, the total depth of the borehole will be determined using a clean, weighted steel tape or tag line.

The monitor wells will be constructed of 2-inch diameter schedule 40 PVC pipe and will include, in ascending order, a flush-threaded silt trap (sump) at the bottom, 10 to 25 feet of flush-threaded 0.01-inch machine-slotted PVC screen, and blank casing from the top of the screen to ground surface. No more than 15 feet of screen will be installed below the water table.

Once the well casing has been lowered to the bottom of the borehole, a sandpack consisting of 12-20 silica sand will be poured down the annulus of the auger in 3-foot lifts. After each 3-foot interval is filled, the augers will be pulled up approximately the same distance. This procedure will be repeated until the sand pack level is approximately 2 feet above the top of the screened section. The annular space above the sand pack will then be filled with a minimum 2-foot-thick

pelletized bentonite seal, which will be hydrated with distilled water. The remaining annular space will be filled with a cement/bentonite slurry grout consisting of approximately 3 percent bentonite by weight. The top of the well casing will be protected by a PVC cap, and the exposed casing will be protected by a locking steel shroud. A 6-inch-thick concrete pad will then be constructed around the shroud. Generalized monitor well construction details are shown in Figure 5-1.

Immediately following well installation, the new monitor wells will be developed following the procedures outlined in Section 5.5.

Ground water samples will be collected from all the existing and newly installed monitor wells. Ground water samples will be collected following the procedures outlined in Section 5.6. Ground water samples will be analyzed for VOCs, PAHs, major ions, TDS, and those metals regulated under WQCC 82-1 Part 3-103 A. & B. Note that this list of metal constituents includes all metals regulated under the Federal Safe Drinking Water Act (SDWA) with the exception of aluminum.

5.3.2 Installation of a Monitor Well into the Bedrock Aquifer

In addition to the installation of additional monitor wells in the uppermost aquifer, one downgradient deep monitor well will be installed into the deeper bedrock aquifer. The purpose of the deep well is to determine whether the bedrock aquifer has been impacted by the release from the former impoundments. The location of the deep bedrock monitor well is indicated in Figure 4-1.

The deep monitor well will be constructed with a 20-foot screened interval spanning an anticipated interval of 100 to 120 feet bgs. In order to avoid potential cross-contamination during well installation, a surface conductor casing will be installed to isolate the uppermost aquifer from the next underlying water-bearing unit. The deep monitor well will be constructed as follows:

1. A large diameter borehole will be advanced to a depth of approximately 90 feet bgs using air- or mud-rotary methods.
2. An 8-inch surface casing will be lowered into the borehole and the annulus will be grouted with a cement-bentonite grout from the bottom up.
3. The grout will be allowed to cure for at least 24 hours; drilling will then proceed inside the surface casing to a total depth of 120 feet bgs (or deeper if necessary to reach saturated soil).
4. A 2-inch diameter monitor well will be constructed within the borehole. From bottom to top, the monitor well will consist of:
 - 20 feet of slotted 0.010 inch schedule 40 PVC screen
 - Flush-threaded schedule 40 PVC blank casing to surface
 - 22 feet of 10-20 silica sand extending from the total depth to 2 feet above the screen
 - A 4.5 foot bentonite seal above the silica sand
 - Cement-bentonite grout to surface
 - PVC cap to protect the well casing
 - A flush-grade locking steel shroud set within a 6-inch thick concrete pad.

Immediately following well installation, the new monitor well will be developed following the procedures outlined in Section 5.5.

Ground water samples will be collected following the procedures outlined in Section 5.6. Ground water samples will be analyzed for VOCs, PAHs, major ions, TDS, and those metals regulated under WQCC 82-1 Part 3-103 A. & B. Note that this list of metal constituents includes all metals regulated under the Federal Safe Drinking Water Act (SDWA) with the exception of aluminum.

5.4 Subsequent Phases of Ground Water Assessment

5.4.1 Subsequent Phases to Complete Delineation of the Contaminant Plume

Subsequent phases of ground water assessment (beyond Phase III activities and routine ground

water monitoring) are not anticipated, however, subsequent phases will be completed if necessary to fully meet the previously stated objectives of this CAP. Prior to any additional assessment activity, Transwestern will develop and submit an assessment plan to the NMED for review and comment. Subsequent assessment plans will be similar in form and scope to the Phase II and Phase III assessment plans and, in general, will include:

- a clear statement of the objectives
- a description of the assessment strategy and methods to be employed
- a diagram indicating the locations of additional ground water monitor wells
- a sample collection and analysis plan
- a schedule for implementation and completion of the assessment activities.

5.4.2 Routine Ground Water Quality Monitoring

Beginning with the completion of the Phase III assessment activities, Transwestern will implement a routine ground water quality monitoring program.

Currently, there are fifteen monitor wells (excluding the five which currently contain accumulated PSH) in the uppermost aquifer. In addition, there will be a minimum of three additional wells that will be installed during the Phase III plan implementation and at least one additional well to be installed to evaluate ground water quality in the deeper bedrock aquifer. In total, Transwestern anticipates there will be a minimum of 19 ground water monitor wells installed at the site and possibly as many as 22 monitor wells installed by the time the Phase III assessment activities are complete.

Ground water samples will be collected from all monitor wells on a quarterly basis during 1997.

Samples will not be collected from wells which contain PSH or from wells which do not contain a sufficient volume of water to collect a sample. Subsequent sample events will be on a semi-annual basis. An exception to the above sampling frequency is that monitor well MW-6 will be sampled on an annual basis. Monitor well MW-6 will be sampled less frequently due to its distance upgradient of the release area and due to the availability of monitor well MW-10 which is located between MW-6 and the release area.

Ground water samples collected during the quarterly sampling events in 1997 will be delivered to a qualified laboratory for analysis for VOCs, PAHs, major ions, TDS, and those metals regulated under WQCC 82-1 Part 3-103 A. & B.

Ground water samples collected during the first semi-annual sampling event in 1998 and subsequent years will be delivered to a qualified laboratory for analysis for VOCs only. Ground water samples collected during the second semi-annual sampling event of each year will be delivered to a qualified laboratory for analysis for VOCs, PAHs, major ions, TDS, and those metals regulated under WQCC 82-1 Part 3-103 A. & B.

In the event analyses indicate a metal constituent is non-detect in all monitor well samples for two consecutive sample events, then these constituents will be eliminated from the sample analysis plan for subsequent sample events. In addition, in the event Transwestern can demonstrate that analyses indicate a metal constituent is within the range of background concentrations in all monitor well samples for two consecutive sample events, then these constituents will be eliminated from the sample analysis plan for subsequent sample events.

Ground water sampling procedures will follow those outlined in Section 5.6. The management of purge water and other ground water sampling related waste generated will be managed as outlined in Section 5.9.

The reporting of routine ground water sampling results will be included in the annual progress report as described in Section 8.3. The information included in the annual report will include the

pertinent information outlined in Section 5.10.

5.5 Monitor Well Development Procedures

The newly installed monitor wells will be developed by a sequence of surging and pumping and/or bailing in accordance with SOP 13.4.3, Well Development. Initially, the wells will be surged to dislodge any smeared material on the borehole wall that would otherwise inhibit ground water flow and to remove fine particles from the formation surrounding the borehole. The suspended sediments will be removed by bailing, pumping, or air lifting. During well development, pH, temperature, specific conductance, and turbidity will be monitored periodically to determine when the wells have been sufficiently developed. Development will be considered complete when the water becomes relatively clear and water quality parameters have stabilized to within ± 5 percent over three consecutive measurements.

5.6 Ground Water Sampling Procedures

Prior to ground water sample collection, the following preparations will be made:

1. The area around the wellhead will be inspected for integrity, cleanliness, and signs of possible contamination.
2. The cap on the wellhead will be removed and a flame ionization detector (FID) or photoionization detector (PID) will be used to determine if VOC vapors are present. Any obvious odors will be noted in the field logbook.
3. The static water level will be measured to the nearest 0.01 foot using an electrical water level sounder. The presence of any obvious contamination on the water level sounder will be noted in the field logbook. The sounder will be decontaminated between wells, as described in Section 5.8, in order to prevent cross contamination.

4. Prior to purging the wells, a clear bailer, hydrocarbon indicating paste, or an interface probe will be used to check for the presence of PSH. The presence or absence of PSH will be recorded in the field logbook, as well as the thickness of PSH, if any.
5. The well will then be purged to remove standing/stagnant water in order to ensure the collection of representative ground water samples. Monitor wells with dedicated bladder pumps will be purged at a rate equal to or greater than the anticipated sample collection flow rate. Monitor wells without dedicated bladder pumps will be purged by hand bailing with dedicated, disposable polyethylene bailers. The field parameters pH, electric conductivity, dissolved oxygen, and temperature will be measured throughout the purging process at a frequency of at least once per casing volume. Purging will continue for a minimum of three casing volumes and until the field parameters remain stable to within ± 5 percent over at least one casing volume, except if the well is a very poor producer. In this case, the well will be purged dry once prior to sample collection. All fluids produced during purging will be contained for later disposal as described in Section 5.9.

Following purging, unfiltered ground water samples will be collected as soon as possible using either a dedicated bladder pump or a dedicated disposable polyethylene bailer. Under no circumstances will the well be allowed to stand for more than three hours after well purging before collecting samples. The only exception is for very low-yield wells that are pumped dry under normal purging and sampling rates. In this case, the well will be pumped dry and allowed to recover until sufficient water is present in the well to allow a sample to be collected.

In the event that a sample is turbid (i.e., > 5 NTU), a note will be placed on the sample COC that instructs the laboratory to filter the sample prior to analyses for inorganic constituents.

The samples will be collected in order of decreasing volatility, with samples for VOC analysis being collected first. The pumping rate during sample collection of VOC samples at monitor wells with a dedicated bladder pump will be maintained at 100 milliliters (mL) per minute or less to minimize volatilization. All samples will be collected in precooled, acidified, certified-clean

40-mL glass vials with septum caps supplied by the laboratory. Following collection of the VOC samples, the SVOC, metals, and other samples will be collected in appropriate containers, as described in greater detail in Section 6.

Sample labeling, packaging, and chain-of custody procedures will be performed as described in Section 6.5. The sample coolers with the associated chain-of-custody forms will be shipped to the laboratory using an overnight commercial carrier. The fastest possible shipping method will be used, and all sample shipments will be carefully tracked to ensure that samples arrive intact and that all holding times are met.

5.7 Aquifer Testing

Aquifer slug tests were performed on each of the monitor well installed during the Phase I assessment activities. Additional aquifer testing is not anticipated, however, additional testing will be performed if warranted to refine the estimate of hydraulic conductivity of the uppermost aquifer. Any additional slug tests will be performed in accordance with the procedures described in SOP 13.6.2, Slug Testing.

Slug tests are performed by causing a sudden change in the water level in the well and then measuring the water level recovery rate. Slug tests will be accomplished by either rapidly removing water from the water column or immersing a solid cylinder (slug) into the water column and measuring the resulting water level recovery. If the slug removal method is used (rising head), water will be removed from the well using a bailer. If the slug immersion method is used (falling head), water will be displaced in the well using a clean, solid PVC cylinder. Whichever method is used, the slug will be of sufficient size to achieve an instantaneous water level change of at least 2 feet.

Water levels will be measured immediately prior to the aquifer test and throughout the recovery period until water levels have recovered to within approximately 95 percent of the static water level.

Standard aquifer testing equations will be used to estimate the hydraulic conductivity of both the uppermost aquifer and deep bedrock aquifer. Appropriate analytical procedures are presented in *Groundwater and Wells* (Driscoll, 1986) and *Analysis and Evaluation of Pumping Test Data* (Kruseman and de Ridder, 1992).

5.8 Decontamination Procedures

All non-disposable field equipment that may potentially come in contact with contaminated ground water or soils will be decontaminated in accordance with SOP 13.5.2, Decontamination of Field Equipment, in order to minimize the potential for cross-contamination between sampling locations. Clean latex or plastic gloves will be worn during all decontamination operations. The following sequence of decontamination procedures will be followed prior to each sampling and/or testing event:

1. Wash the equipment in a solution of non-phosphate detergent (Liquinox[®]) and distilled/deionized water. Use a clean Nalgene[®] tub to contain the wash solution and a scrub brush to mechanically remove loose particles.
2. Rinse the equipment twice with distilled/deionized water.
3. Allow the equipment to air dry before the next use.

5.9 Management of Investigation-Derived Wastes

A variety of wastes will be generated during the implementation of the ground water assessment plan. These wastes include soil cuttings, decontamination fluids, used PPE, and ground water produced during well development and purging.

All contaminated media (soil and ground water) which are managed at the site, including IDW,

which contain hazardous constituents at a concentration above the performance standards set forth in Sections 7.2 and 7.3 of this CAP, yet which do not exceed any Toxicity Characteristic Leaching Procedure (TCLP) constituent concentration levels under the Hazardous Waste Management Regulations (20 NMAC 4.1) may either: 1) be treated on-site to reduce the concentration of hazardous constituents within the media to the levels set forth as performance standards within this CAP; or 2) be disposed of off-site as non-hazardous wastes in accordance with all other applicable laws and regulations.

All liquid wastes which are collected will be drummed and labeled to identify the contents, date of generation, and amount of material generated. All waste containers generated during the ground water assessment will be stored in a designated drum storage area within the facility. If the water is determined to be hazardous, it will be filtered through an activated carbon filtration system. A verification sample of each potential waste stream that has been filtered will be analyzed by the appropriate analytical method to test for the characteristics by which the water was determined to be hazardous. Upon verification that the water is clean, it will be released to the ground surface on-site. If the water after verification sampling shows concentrations of constituents above any applicable federal, state, and or local regulations then the remaining waste will be disposed of according to applicable regulations. Used carbon filters will be disposed of properly pending analytical results.

Hydrocarbon contaminated soils, as determined by field headspace screening (PID headspace measurement > 100 ppmv), will be segregated from soils determined by field screening not to be contaminated (PID headspace measurement < 100 ppmv). Soils segregated by field screening techniques will await analytical results before a hazardous waste determination is made. Clean soil will be disposed of on-site by spreading soil cuttings on the ground surface. Soil determined to be characteristically hazardous will be shipped for off-site disposal at a permitted RCRA disposal facility.

PPE and dry waste associated with these activities will be disposed of in a sanitary landfill.

5.10 Reporting Requirements

Following completion of the Phase III ground water assessment, and all subsequent ground water assessments, the results of the assessment activities will be summarized in a report submitted to the NMED along with copies of the laboratory results for the ground water samples analyzed.

The report submitted after each assessment will include the same information, if relevant, as described in Section 4.9 for the soil assessment reporting. In addition, the report will include the following information, as applicable:

- ground water sampling information
 - 1) monitor well ID
 - 2) sample date - time
 - 3) field observations (i.e., presence of PSH, turbidity, odor, etc.)
 - 4) sample parameters/methods
 - 5) sample container types
 - 6) sample handling procedures
 - 7) copy of chain of custody
 - 8) sample results & detection limits
 - 9) any pertinent QA/QC information
- comparison of constituents detected with previous sample results, action levels, and/or background levels and any QA/QC concerns
- water table elevation map indicating hydraulic gradient and ground water flow direction
- PSH distribution map indicating the lateral estimated extent of PSH at the water table
- contaminant distribution map(s) showing the concentrations and horizontal extent of contamination for key hazardous constituents identified from laboratory analysis

- discussion and results from any aquifer testing.

6. QUALITY ASSURANCE PROJECT PLAN

This section describes the procedures that will be followed to ensure that the data obtained during this investigation will be adequate for the project objectives. The Quality Assurance Project Plan (QAPP) presented herein describes the laboratory analyses to be performed, data quality objectives, and quality assurance/quality control (QA/QC) procedures to be used to ensure that project objectives are met. Sections 6.1 through 6.12 have been prepared in accordance with the *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans* (U.S. EPA, 1983), and are those elements required for consideration in any QAPP, according to EPA.

6.1 Analytical Parameters and Methods

Based on previous investigations, petroleum hydrocarbons, SVOCs, and the chlorinated solvent 1,1,1-TCA are recognized as the principal constituents of concern in soil and ground water at the site. However, in order to ensure that other constituents are not present, initial characterization included nearly all of the Appendix IX constituents. Accordingly, soil and ground water samples collected as described in Section 3.6, 3.7, and 3.8 of this CAP were analyzed for the suite of target analytes listed in Table 6-1.

In addition, ground water samples will be analyzed for major cations and anions and total dissolved solids in order to characterize the overall water quality. Total petroleum hydrocarbons (TPH) will also be determined for soil samples. Analytical methods for all parameters will follow standard RCRA procedures specified in *Test Methods for Evaluating Solid Waste* (SW-846) (EPA, Third Editin, Update II).

6.2 Data Quality Objectives

Data quality objectives (DQOs) are the qualitative and quantitative objectives established to ensure that the data generated meet the needs of the project. Therefore DQOs are project- specific

and depend largely on the ultimate use for which the data are intended. DQOs have been established for this project in accordance with EPA guidance documents, particularly *Data Quality Objectives for Remedial Response Activities* (U.S. EPA, 1987a), and *RCRA Ground Water Monitoring: Draft Technical Guidance* (U.S. EPA, 1992). The parameters used to quantify data quality include precision, accuracy, representativeness, completeness, and comparability (PARCC).

Objectives or goals for the so-called PARCC parameters (U.S. EPA, 1987a) constitute the project-specific DQOs for a particular investigation. Each PARCC parameter is described below, along with the proposed DQO for this closure plan, where applicable. The proposed DQOs for this investigation are summarized in Table 6-1.

- **Precision** is a quantitative measure of the reproducibility (or variability) of the analytical results. Precision will be calculated by determining the relative percent difference (RPD) between the concentrations reported for field duplicate samples collected from the same location. Methods for collecting duplicate field samples are discussed in Section 5.3. The proposed RPD precision objective is 20 or less.
- **Accuracy** is defined as the degree to which the reported analytical result approaches the "true" value. Accuracy will be estimated through the analysis of matrix spikes (MS). The percent recovery (%R) of the "true" spike concentration will be calculated for each MS. The accuracy objective is within the range of 80 to 120 percent recovery of the matrix spike.
- **Representativeness** refers to how well the analytical data reflect subsurface contaminant concentrations. Due to numerous site-specific factors, such as the degree of heterogeneity in the subsurface, representativeness is difficult to define and even more difficult to quantify. For this project, representative data will be attained through the use of consistent and approved sampling and analytical procedures and through a well defined sampling plan that specifies adequate investigation of all areas of concern.

- **Completeness** is the percentage of samples collected that meet or exceed the DQOs for precision, accuracy, and representativeness, as estimated from the analysis of QA/QC samples described above. The completeness objective for this project is 90%.
- **Comparability** is an assessment of the relative consistency of the data. No quantitative method exists for evaluating comparability; hence, professional judgment must be relied upon. Internal comparability of the soil and ground water data set will be achieved by the use of consistent sampling and analysis procedures throughout the project. Likewise, by using identical analytical methods to those employed during previous investigations, the data generated during this investigation will be comparable with existing data.

6.3 Quality Assurance/Quality Control Samples

QA/QC samples include matrix spikes/matrix spike duplicates (MS/MSD), field duplicates, trip blanks, and equipment blanks. EPA guidance recommends that QA/QC samples be collected at a minimum 5-percent frequency (U.S. EPA, 1987). For this project, both soil and ground water QA/QC samples will be analyzed at this frequency.

Equipment blank samples are collected in order to determine if any of the analytes detected in environmental samples may be attributable to improper and/or incomplete decontamination of field sampling equipment. Equipment blanks will be collected in the following manner. After the sampling device has been decontaminated in accordance with SOP 13.5.2, Decontamination of Field Equipment, it will be rinsed with deionized water. The rinsate will be collected and sent to the laboratory as an equipment blank.

Field duplicate samples will be collected to provide a measure of precision for the analytical results. VOC soil duplicates will be collected by submitting two adjacent brass liner rings from the same split-barrel sample. The ground water duplicate samples will be collected by filling sample containers in an alternating manner following the sampling protocol described in

Section 5.6 of this closure plan.

One VOC trip blank will accompany each shipment to the laboratory. VOC trip blanks are prepared as a check on possible contamination originating from container preparation methods, shipment, handling, storage, or other site-specific conditions. VOC trip blanks will consist of deionized, organic-free water added to a clean 40-mL glass septum vial.

In addition to the above QA/QC samples, MS/MSD analyses will be performed in the laboratory by spiking the soil or water samples with a known quantity of the analyte of interest. MS/MSD analyses are performed to determine laboratory accuracy and precision and to determine if any matrix interferences exist. MS/MSD analysis will be specified on the chain-of custody form for at least 5 percent of the samples collected.

6.4 Sampling Procedures

The soil and ground water sampling procedures described in Sections 4 and 5 will be performed in accordance with SOPs 13.3.2 and 13.5, respectively. A summary of the analytical methods, required sample volumes, containers, and sample preservation is provided in Table 6-2. All sample containers will be acquired from the laboratory and will be certified clean.

Adhesive labels will be applied to the sample containers, and a waterproof marking pen will be used to complete the labels. Information will include the date and time of sample collection, type of analysis to be performed, preservative used (if any), depth of sample (for soils), and the initials of sampling personnel. The containers will be sealed and placed in clear plastic bags. The sealed containers will be put in coolers on bags of ice or frozen ice packs. Plastic bubble pack or other suitable packing material will be used to prevent breakage.

The field personnel will ship the sample coolers to the laboratory using an overnight courier service. The fastest possible shipping method will be used, and all sample shipments will be carefully tracked to ensure that samples arrive intact and that all holding times are met.

6.5 Chain of Custody Procedures

For analytical data to be valid, samples must be traceable from the time of collection through chemical analysis and final disposition. Chain-of-custody forms have been developed for this purpose. The necessary blank documents will be obtained from the laboratory, including chain-of-custody forms and seals.

Chain-of-custody forms will be completed in triplicate. The original form and one copy will be placed inside each cooler, and one copy will be retained by field personnel. The chain-of-custody forms accompanying each cooler will be sealed in a plastic bag and taped to the inside of the cooler lid. Each cooler will have a clearly visible return address. The cooler lids will be secured with shipping tape that encircles the cooler ends. A chain-of-custody seal will be placed at the front left and rear right sides of the cooler so that opening the lid will break the chain-of-custody seals.

Field activities and sample collection will be documented in a bound logbook dedicated to the project. For each sample, the location, time, monitor well/boring number, sample depth, sample volumes and preservation, and other pertinent field observations will be recorded. Each page of the logbook will be dated, numbered, and signed by those individuals making entries.

6.6 Equipment Calibration Procedures and Frequency

Numerous instruments will be used in the field and the laboratory during investigation. In order for reliable data to be generated, it is important that these instruments be routinely calibrated. Calibration of analytical instruments within the laboratory will be the responsibility of the contracted laboratory. Although the details of the laboratory calibration procedures are beyond the scope of this QAPP, the frequency of initial and continuing calibrations will adhere to established EPA protocols, as described in the analytical method (U.S. EPA, 1986). In addition, the laboratory's QA manual will be available for review upon request.

During field investigation, use of the following field equipment is anticipated:

- PID (Thermo Environmental 580B or equivalent)
- FID type OVA (Foxboro 108 or equivalent)
- Salinity-conductivity-temperature (SCT) meter (YSI Model 33 or equivalent)
- pH meter (Orion Model 250A or equivalent)
- Dissolved oxygen (DO) meter (YSI Model 57 or equivalent)
- Water level indicator (Solinst or equivalent)
- PSH interface meter (Solinst or equivalent)

Calibration and maintenance procedures for each of these instruments are described in the following paragraphs. Documentation of daily calibration for each of these instruments will be recorded in the field logbook, along with any required maintenance procedures performed.

A PID and/or FID will be used to screen soil samples for volatile organic compounds using the headspace method. The PID or FID will also serve for health and safety monitoring of the work area for organic vapors. Background VOC concentrations will be recorded daily in the logbook. The PID and/or FID will be calibrated daily with standard isobutylene (PID) or standard methane (FID). Recalibration of the PID and/or FID can occur during the work day at the discretion of the site health and safety officer in the event of suspect readings. Care will be taken to ensure that the PID and/or FID remains free of sand and dirt. The battery will be charged on a daily basis.

The SCT meter calibration will be checked initially with a standard potassium chloride solution and mercury thermometer, and a battery check will be performed daily prior to beginning field work. In the event of erratic measurements, the instrument calibration will be checked in the field. When not in use, the electrode will be kept immersed in deionized water to keep the platinum black surfaces fully hydrated, in accordance with manufacturers' instructions.

Prior to use each day, the pH meter will be calibrated using two pH buffers. The buffer solutions

will be chosen to bracket the expected ground water pH range. Calibration of the instrument will be periodically checked throughout the day using the pH buffers to ensure accurate readings. In the event of instrument drift, the pH meter will be recalibrated. The electrode will be rinsed with deionized water following each measurement and placed in the appropriate potassium chloride storage solution.

The DO meter will be calibrated in air by adjusting the calibration control until the oxygen concentration reads the correct value for the elevation and temperature at the site. The DO meter calibration will be checked periodically during the day and recalibrated if necessary.

The water level indicator will be initially calibrated against a steel tape, prior to commencement of field activities. The battery and electrical connections will be periodically checked to ensure proper functioning of the instrument. The indicator probe and tape will be rinsed clean following each measurement. The PSH interface meter will be calibrated in a similar manner following manufacturer's instructions.

6.7 Data Reduction and Reporting

Data reduction will be performed by the laboratory in accordance with EPA protocols for the respective analytical method. Data from the analytical laboratory will be reviewed following the laboratory's internal QA/QC plan. All EPA required elements will be provided with the data package. If the analytical data do not meet the minimum data quality objectives, the laboratory will implement the corrective actions described in Section 6.10. All data falling outside the quality control limits defined in this QAPP will be flagged by the laboratory, as required by EPA protocol. Any discrepancies noted in the laboratory QA review will be noted in the case summaries included with the data packages.

Following each investigation phase of the project, the degree to which the data quality objectives have been met will be examined by comparing the actual results for the QA/QC samples with the objectives listed in Table 6-1. The results of this comparison will be tabulated in the final report,

along with detailed descriptions of any deviations from the protocols proposed in this CAP.

6.8 Internal Quality Control Checks

The specific quality control checks to be used are included with the individual analytical methods specified for each parameter. The quality control criteria for VOCs and TPH (gasoline) are described in *Test Methods for Evaluating Solid Wastes - SW-846*, (U.S. EPA, 1986).

6.9 Performance and System Audits

Performance and system audits are the practices followed by analytical laboratories to evaluate quality control procedures and laboratory performance (U.S. EPA, 1983). System audits are performed in order to assess whether a new analytical system is functioning properly. Performance audits rate the ongoing performance of the laboratory in terms of the accuracy and precision of the analytical data generated. Examples of performance audits include the analysis of performance evaluation samples, such as standard reference materials obtained from the National Institute of Standards and Technology or EPA, or participation in interlaboratory performance evaluation studies using "round-robin" samples. Each participating laboratory is graded and ranked based on the results. The performance and system audits of the laboratory contracted for this CAP will be provided and available for review.

6.10 Corrective Actions

If QA activities reveal apparent problems or deficiencies with the analytical data, corrective actions must be applied. The type of corrective action depends on the specific problem that occurs, but a general sequence of corrective actions will be followed. If the data do not fall within the prescribed data quality objectives, the affected samples will be re-analyzed by the laboratory until the objectives are met. Any data falling outside QC limits will be flagged and qualified to explain the nature of the data quality problem.

6.11 Routine Data Assessment Procedures

Routine procedures to assess the precision, accuracy, and completeness of the analyses include RPD for field duplicates and MS/MSD samples, as well as percent recovery (%R) for MS samples. The specific statistical techniques to be used are described with the appropriate analytical method (U.S. EPA, 1986). Any problems or deficiencies will be reported to the NMED in the progress reports, or by telephone, if warranted by the nature and urgency of the problem.

6.12 Quality Assurance Reports to Management

Periodic assessment of data accuracy, precision, and completeness will be performed by the QA manager of the contracted laboratory. The results of these assessments, as well as the results of laboratory performance and system audits, will be available upon request. The laboratory QA manager will also review the case narratives and accompanying analytical data package to ensure that all data quality objectives are met. In the event that objectives are not met, the QA manager will consult with the laboratory manager to correct the problem.

7. REMEDIATION OBJECTIVES AND PRELIMINARY STRATEGY

7.1 Statement of Remediation Objective

Transwestern intends to remediate affected soil and ground water which resulted from a release from the former impoundments in such a manner whereby any hazardous constituents that may be present are removed to the extent that future threats to human health and the environment attributable to the facility no longer exist.

7.2 Performance Standards for Soil

The numerical performance standards for both organic and inorganic constituents in soil are included in Table 7-1.

7.2.1 Total Petroleum Hydrocarbons and BTEX Constituents in Soil

In regard to remediation of soils affected by elevated levels of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) constituents, Transwestern will adopt the guidelines of the OCD as specified in the guidance document "Guidelines for Remediation of Leaks, Spills and Releases" which was issued by the OCD on August 13, 1993. A copy of this reference is included in Appendix A.

Based on these guidelines, the performance standard for benzene in soil is 10 mg/kg and the performance standard for Total BTEX (the sum of the four BTEX constituent concentrations) is 50 mg/kg. The performance standard for TPH in soil will be either 100 mg/kg, 1000 mg/kg or 5000 mg/kg, dependent upon several factors, most significantly, the depth to ground water of "present or foreseeable beneficial use". This depth will be determined in the course of the assessment of the deeper bedrock aquifer.

In order to achieve this performance standard, the measured concentration of TPH, benzene, and Total BTEX in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a TPH concentration greater than 5 times the performance standard or a benzene or Total BTEX concentration greater than 2.5 times the performance standard. For the purpose of this determination, EPA Method 418.1 will be used to evaluate soil samples for TPH and EPA Method 8020 or EPA Method 8240 will be used to evaluate soil samples for BTEX constituents.

7.2.2 Other Organic Constituents in Soil

In the absence of performance standards for soil remediation of other organic constituents established by State of New Mexico EIB or OCD regulations, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. A copy of this reference is included in Appendix C.

For those organic constituents for which a TNRCC Risk Reduction Standard 2 criteria is not available, Transwestern will adopt by reference the soil screening levels (SSLs) for transfers from soil to ground water listed in the USEPA Region III risk-based concentration table, "Risk-Based Concentration Table, January - June 1996". A copy of this reference is included in Appendix D.

In order to achieve this performance standard, the measured concentration of each organic constituent in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a concentration greater than 2.5 times the performance standard. For the purpose of this determination, EPA Method 8010/8020 or EPA Method 8240 will be used to evaluate soil samples for VOCs and EPA Method 8100 or EPA Method 8270 will be used to evaluate soil samples for PAHs.

7.2.3 Inorganic Constituents in Soil

In the absence of performance standards for soil remediation of inorganic constituents established by State of New Mexico EIB or OCD regulations, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. For those inorganic constituents for which a TNRCC Risk Reduction Standard 2 criteria is not available, Transwestern will adopt by reference the soil screening levels (SSLs) for transfers from soil to ground water listed in the USEPA Region III risk-based concentration table, "Risk-Based Concentration Table, January - June 1996". For those inorganic constituents for which neither a TNRCC Risk Reduction Standard 2 criteria or an SSL is available, the performance standard will be established at 100 times the risk-based concentration level for tap water as listed in the USEPA Region III risk-based concentration table document (i.e., 100 times the risk-based concentration for tap water in mg/L would become the performance standard for soil in mg/kg).

Because many metal constituents are naturally occurring in soil, the performance standard for each inorganic constituent will be subject to a floor established at 3 standard deviations above the mean background concentration. For the purpose of this plan, a measured concentration of an inorganic constituent which falls within 3 standard deviations (99.7 percent range) of the mean concentration will be considered within the range of background concentrations. The mean background concentration and standard deviation will be established for each metal constituent in soil representative of the most highly affected soil at the site (the soil immediately beneath the former Pit 1 area) in the course of the Phase III assessment activities.

In order to achieve this performance standard, the measured concentration of each inorganic constituent in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a concentration greater than 2.5 times the performance standard. For the purpose of this determination, the analytical methods listed in Table 6-1 will be used to evaluate soil samples for inorganic constituents.

7.3 Performance Standards for Ground Water

The numerical performance standards for both organic and inorganic constituents in ground water are included in Table 7-2.

7.3.1 Organic Constituents in Ground Water

In regard to remediation of ground water affected by elevated levels organic constituents, Transwestern will adopt the current NMWQCC standards as specified in Appendix B. However, for any organic constituent for which a Safe Drinking Water Act Maximum Contaminant Level (MCL) has been established, the lower numerical standard of the NMWQCC standard and the current MCL will be adopted as the performance standard. For those organic constituents for which a NMWQCC or a MCL standard is not available, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. For those organic constituents for which neither a NMWQCC standard or a TNRCC Risk Reduction Standard 2 criteria is available, the performance standard will be established at the risk-based concentration level for tap water as listed in the USEPA Region III risk-based concentration table, "Risk-Based Concentration Table, January - June 1996".

In order to achieve these performance standards, the concentration of each organic constituent of concern must be measured below the established performance standard at all monitor well locations for a minimum of four consecutive semi-annual ground water monitoring events. For the purpose of this determination, EPA Method 8010/8020 or EPA Method 8240 will be used to evaluate ground water samples for VOCs and EPA Method 8100 or EPA Method 8270 will be used to evaluate ground water samples for PAHs.

7.3.2 Inorganic Constituents in Ground Water

In regard to remediation of ground water affected by elevated levels of inorganic constituents,

Transwestern will adopt the current NMWQCC standards as specified in Appendix B. However, for any inorganic constituent for which a Safe Drinking Water Act Maximum Contaminant Level (MCL) has been established, the lower numerical standard of the NMWQCC standard and the current MCL will be adopted as the performance standard. For those inorganic constituents for which a NMWQCC or a MCL standard is not available, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993].

Because many inorganic constituents are naturally occurring in ground water, a two phased approach will be used to evaluate ground water potentially affected by inorganic constituents. First, a determination will be made whether the measured concentration of inorganic constituents in ground water samples are within the criteria established for performance standards in Table 7.2. If so, no further consideration is necessary. However, if the measured concentration of an inorganic constituent is above the established performance standard, then a statistical comparison must be made to determine whether or not the measured concentration is within the acceptable range of background concentrations. The acceptable range of background concentrations will be based on site specific information available from unaffected monitor wells.

In order to achieve the performance standards, the concentration of each inorganic constituent of concern must be measured either: 1) below the established performance standard, or 2) within the range of background concentrations, at all monitor well locations for a minimum of four consecutive semi-annual ground water monitoring events. For the purpose of this determination, the analytical methods listed in Table 6-1 will be used to evaluate ground water samples for inorganic constituents.

7.4 Provision for Technical Impracticability & Alternative Remedial Strategies

In the event it becomes apparent that the chosen remedial strategy is technically incapable or technically impracticable to achieve the abatement standards set out in Sections 7.2 and 7.3 above, Transwestern will either:

- a. evaluate and propose an alternative remedial strategy which could achieve the established abatement standards; or
- b. propose that abatement standards compliance is technically infeasible as set out below in this section and Section 7.5.

If Transwestern is unable to fully meet the abatement standards set forth in Sections 7.2 and 7.3 above using commercially accepted abatement technology pursuant to this CAP, Transwestern may propose that abatement standards compliance is technically infeasible. [Note: the provisions included in this section, Section 7.4 of the CAP, were adopted (with minor modification for clarity) from the State of New Mexico abatement regulations set out in NMR Title 20/Chapter 6/Part 2/Subpart IV/4103.] Technical infeasibility proposals involving the use of experimental abatement technology shall be considered at the discretion of the Secretary of the NMED. Technical infeasibility may be demonstrated by a statistically valid extrapolation of the decrease in concentration(s) of any water contaminant(s) over the remainder of a twenty (20) year period, such that projected future reductions during that time would be less than 20% of the concentration(s) at the time technical infeasibility is proposed. A statistically valid decrease cannot be demonstrated by fewer than eight (8) consecutive sampling events. The technical infeasibility proposal shall include a substitute abatement standard(s) for those contaminants that is/are technically feasible. Abatement standards for all other water contaminants not demonstrated to be technically infeasible shall be met.

In no event shall a proposed technical infeasibility demonstration be approved by the Secretary for any contaminant if its concentration is greater than 200% of the abatement standard for that contaminant.

If the Secretary cannot approve any or all portions of a proposed technical infeasibility demonstration because the contaminant concentration(s) is/are greater than 200% of the abatement standard(s) for each contaminant, Transwestern may further pursue the issue of technical infeasibility by filing a petition with the Secretary seeking:

- a. approval of alternate abatement standard(s) pursuant to Section 7.5 below; or

- b. granting of a variance to the abatement standard.

7.5 Provision for Setting Risk Assessment Based Performance Standards

Transwestern realizes that it may not be technically practicable or from a risk-based perspective necessary to remediate soil and ground water to the generically derived and overly conservative abatement standards set out in Sections 7.2 and 7.3. Therefore, if warranted, Transwestern may file a petition seeking approval of alternative abatement standard(s) for the standards set forth in Sections 7.2 and 7.3 above. [Note: the provisions included in this section, Section 7.5 of the CAP, were adopted (with minor modification for clarity) from the State of New Mexico abatement regulations set out in NMR Title 20/Chapter 6/Part 2/Subpart IV/4103.] The NMED may approve alternative abatement standard(s) if Transwestern demonstrates that:

- a. (1) compliance with the abatement standard(s) is/are not feasible, by the maximum use of technology within the economic capability of Transwestern; or
(2) there is no reasonable relationship between the economic and social costs and benefits (including attainment of the standard(s)) to be obtained;
- b. the proposed alternative abatement standard(s) is/are technically achievable and cost-benefit justifiable; and
- c. compliance with the proposed alternative abatement standard(s) will not create a present or future hazard to public health or undue damage to property.

The petition shall be in writing, filed with the Secretary of the NMED. The petition shall specify, the soil and/or water contaminant(s) for which alternative standard(s) is/are proposed, the alternative standard(s) proposed, the specific volume of soil and water for which approval is sought, and the extent to which the abatement standard(s) set forth in Sections 7.2 and 7.3 is/are now, and will in the future be, violated. The petition may include a transport, fate and risk assessment in accordance with accepted methods, and other information as the petitioner deems necessary to support the petition.

The Secretary of the NMED shall review the petition and, within sixty (60) days after receiving

the petition, shall submit a written approval, approval subject to conditions, or disapproval of any or all of the proposed alternative abatement standard(s). The written notice shall include the reasons for the Secretary's decision. The Secretary shall submit a copy of the written notice to Transwestern by certified mail.

7.6 Anticipated Remediation Technology to Address Affected Near-Surface Soils

In the course of the Phase I assessment activities, soil samples were collected from the most highly affected soils located within the former Pit 1 and Pit 2 areas at depths ranging from 4 to 12 feet bgs. These soils contained a high concentration of petroleum hydrocarbon as indicated by the lab results for TPH, particularly the soils located immediately beneath the former Pit 1 area. As a result of the heavy content of petroleum hydrocarbon in the soil matrix, in-situ methods for remediation are not likely to be effective, primarily because there is very little pore space available for the introduction or extraction of treatment fluids or soil vapors. In light of this situation, ex-situ remediation techniques are anticipated for the most highly affected near surface soils.

Four remediation techniques/methods, or some combination of the four techniques, will be employed for the remediation of near surface soils: off-site removal, on-site treatment by soil washing, on-site treatment by stabilization, and on-site treatment in constructed bio-treatment piles. Each of these methods would by necessity be preceded by excavation of the highly affected soil.

It should be noted that ex-situ remediation techniques will only be implemented so long as excavated contaminated media is characterized as non-hazardous. Based on the results for soil samples collected in the course of the Phase I assessment activities, Transwestern anticipates that excavated contaminated media will not be characteristically hazardous.

During excavation of the highly affected near surface soils, the excavated media will be segregated on-site by the relative content of petroleum hydrocarbon contained in the media.

More specifically, media will be segregated into that which can reasonably be treated on-site in bio-treatment piles and that which is so heavily affected that bio-treatment would be difficult. The more heavily affected near surface soil would then either be removed to an appropriate and permitted facility for disposal, or treated on-site by soil washing or soil stabilization techniques if the volume is sufficiently large enough to make on-site treatment economically feasible.

The contaminated media segregated for on-site treatment in bio-treatment piles will be processed through soil screening/crushing equipment (such as a Kolberg soil screening plant commonly used in the construction industry) and placed back into the excavated area to create one large treatment cell or into piles to create several smaller and separate treatment cells. Whether one large treatment cell or several smaller treatment cells are created will depend upon the actual volume of soil to be treated, the anticipated post-processing TPH concentration, and the performance standard for TPH (i.e., 100, 1000, or 5000 mg/kg) which will be determined during the course of subsequent assessment activities as discussed in Section 7.2.1. During the course of soil processing, amendments will be added to the soil to enhance the biological destruction of the petroleum hydrocarbon compounds. In addition, a conveyance system for the continued addition of air and moisture may be incorporated into the construction of the treatment cell(s).

The bio-treatment cells will be actively managed, if necessary, until which time all applicable performance standards are met and have been confirmed by the collection and analysis of confirmation samples.

7.7 Anticipated Remediation Technology to Address Affected Deeper Soils

The affected deeper soils (greater than 14 feet bgs) beneath and adjacent to the former Pit 1 and Pit 2 areas will be remediated primarily by soil vapor extraction (SVE) and bioventing technologies. These technologies would be implemented sequentially (i.e., SVE then bioventing).

The affected deeper soils are primarily affected by lighter end petroleum hydrocarbon compounds typically found in pipeline condensate and are readily amenable to SVE and

bioventing. Transwestern anticipates that this will be accomplished utilizing a grid of SVE wells constructed such that soil vapor could be extracted from two distinctly separate horizons; one between approximately 14 feet bgs and the perching clay layer found at a depth of about 30 feet bgs, and the other between the lower boundary of the perching clay layer and the water table of the uppermost aquifer.

The grid spacing for SVE wells will be determined based on the results of the SVE pilot test which was conducted during the Phase II activities. At this time, it is anticipated that the spacing will be on the order of 60-75 feet from one well center to the next. The total number of SVE wells required within each horizon will be dependent upon the lateral extent of affected soil at each horizon. Although this will be determined to some extent during subsequent assessment activities, the lateral extent will be even more closely defined as soil samples are collected and evaluated in the course of drilling soil borings to install SVE wells. That is, the SVE well grid will be extended by additional wells until the lateral extent of affected soil has been defined by an outer boundary of SVE well borings that will produce soil samples below the performance standards for soils.

Each SVE well will be connected to a manifold via a vapor conveyance system. The vapor conveyance system will be constructed such that vapor can be extracted (or introduced during subsequent bioventing operation) and vapor samples can be collected from each SVE well independently.

The manifold will convey the extracted vapor to a vapor treatment system. At this time, Transwestern anticipates that the vapor treatment system will consist of a prepackaged, combination blower/thermal oxidizer unit such as one manufactured by Baker Furnace. Due to the concentration of VOCs anticipated to be contained in the pre-treatment vapor stream, an air permit will be required from the NMED Air Pollution Control Bureau for the vapor treatment system prior to startup of the system.

As operation of the SVE system progresses, VOC concentrations in extracted vapor will decline.

When VOC concentrations have declined to the point at which a determination is made that bioventing will more cost effectively continue the remediation of affected deeper soil, then the SVE conveyance system will be utilized for the introduction of air into the SVE wells. This will facilitate the destruction of remaining petroleum hydrocarbons by in-situ biological activity.

The SVE system and the subsequent bioventing system will be operated and maintained until which time all applicable performance standards are met and have been confirmed by the collection and analysis of confirmation samples.

7.8 Anticipated Remediation Technology to Address Phase Separated Hydrocarbon

The removal of phase separated hydrocarbon (PSH) will be accomplished primarily by the same SVE system installed for remediation of the affected deeper soils. In addition to SVE as a method for removing PSH, SVE wells located in the area (or areas) containing PSH at the water table may be modified such that dual phase extraction can be implemented.

In the event it is determined that a significant mass of residual phase hydrocarbon remains in the soil matrix below the water table, Transwestern will consider partially dewatering the uppermost aquifer in the area containing residual phase hydrocarbon so that the contaminants can more effectively be removed by the SVE system.

7.9 Anticipated Remediation Technology to Address Affected Ground Water

The anticipated technology for remediation of affected ground water is by in-situ enhancement of aerobic biodegradation.

Two technologies will be employed to accomplish the in-situ enhancement of aerobic biodegradation: 1) direct injection of oxygen as a component of air below the water table (i.e. air sparging); and 2) replacement of oxygen depleted soil vapor with oxygen rich soil vapor in the unsaturated zone above the water table (i.e. soil vapor extraction). These two technologies are

commonly employed together as a system. In this arrangement, the primary objective of air sparging is to increase the concentration of dissolved oxygen in ground water thereby enhancing aerobic biodegradation of dissolved phase hydrocarbon compounds; and the primary objective of SVE is to control the potential migration of volatile organic compounds away from the impacted area and to enhance the aerobic biodegradation of hydrocarbon compounds trapped above the ground water table.

The air sparging process involves the injection of air under pressure at an air sparge well screened below the water table. The air migrates upward through the soil column creating air filled channels in the saturated zone. As a result, sparged air increases the oxygen concentration in both the saturated and unsaturated zones, which enhances aerobic biodegradation. Furthermore, volatile organic compounds (VOCs) that are exposed to this sparged air environment volatilize into the gas phase and are carried into the vadose zone where they may be biodegraded or removed by soil vapor extraction. Air sparging combined with soil vapor extraction, provides the following benefits:

- Removes VOCs in the saturated and capillary fringe zones where the mass is greatest;
- Enhances aerobic biodegradation of VOCs due to an increase in dissolved oxygen levels;
- Reduces clean-up times and cost savings over pump and treat and/or SVE alone;
- Minimizes ground water extraction and associated treatment and disposal costs;
- Removes any potential source of continuing dissolved phase contamination in the ground water; and
- Reduces the mass of potential dissolved phase contaminants.

The air sparge system and the associated SVE system will be operated and maintained until which time either the performance standards for ground water have been achieved or until it can be demonstrated that natural attenuation processes can continue the remediation of affected ground water without the assistance of the air sparging/SVE system.

7.10 Management of Contaminated Media

In the course of remediation activities, significant quantities of contaminated media (soil and ground water) will be managed at the site including IDW, excavated soil, and recovered ground water.

All contaminated media (soil and ground water) which are managed at the site, including IDW, which contain hazardous constituents at a concentration above the performance standards set forth in Sections 7.2 and 7.3 of this CAP, yet which do not exceed any Toxicity Characteristic Leaching Procedure (TCLP) constituent concentration levels under the Hazardous Waste Management Regulations (20 NMAC 4.1) may either: 1) be treated on-site to reduce the concentration of hazardous constituents within the media to the levels set forth as performance standards within this CAP; or 2) be disposed of off-site as non-hazardous wastes in accordance with all other applicable laws and regulations.

All contaminated soil which is managed at the site which contains hazardous constituents at a concentration below the performance standards set forth in Sections 7.2 and 7.3 of this CAP and all uncontaminated soil managed at the site will remain at the site and will either: 1) be used as backfill material at the site; or 2) spread out on the ground surface at the site.

All contaminated ground water which is managed at the site which contains hazardous constituents at a concentration below the performance standards set forth in Sections 7.2 and 7.3 of this CAP and all uncontaminated ground water managed at the site will remain at the site and will be released to the ground surface at the site.

8. PROJECT SCHEDULE & ROUTINE REPORTING REQUIREMENTS

8.1 Anticipated Project Schedule

The anticipated project schedule outlines key tasks which are either planned or anticipated to occur. It should be noted that this is an “**anticipated**” schedule and is likely to require modification as the assessment and remediation activities proceed.

Task #	Task & Description	Start	Complete
1.	<i>Phase III Assessment Plan</i> Collect soil samples for corrective measures study; Collect soil samples to determine background metal concentrations; Install additional monitor wells into the uppermost aquifer; Install one monitor well into the deeper bedrock aquifer.	12/96	2/97
2.	<i>Phase III Assessment Field Activities</i>	3/97	6/97
3.	<i>Phase III Assessment Report</i> In addition to presenting the results of Phase III activities, this report will also serve as a summation of all soil and ground water assessment activities.	6/97	9/97
4.	<i>Corrective Action Plan</i> Finalize corrective action plan for: affected near surface soils; affected deeper soils; removal of PSH; and affected ground water.	6/97	12/97
5.	<i>Implement CAP for Affected Near Surface Soils</i> Excavation and ex-situ treatment of highly affected soils.	8/97	12/97
6.	<i>Implement CAP for Affected Deeper Soils</i> Installation of SVE wells and vapor extraction and emission control equipment.	4/98	8/98

7.	<i>Implement CAP for Removal of PSH</i> Installation of PSH recovery wells and dual phase extraction equipment.	4/98	8/98
8.	<i>O&M of CAP for Tasks #8 & #9</i> Operation and maintenance of the SVE and dual phase extraction systems.	6/98	6/00
9.	<i>Implement CAP for Affected Ground Water</i> Installation of air sparge points and associated equipment; O&M of ground water remediation system until closure requirements are met.	6/00	6/05
10.	<i>Confirmation Soil and Ground Water Sampling</i>	6/05	12/05
11.	<i>Final Completion Report</i>	12/05	6/06

Not included in the schedule above are the annual progress reports described in Section 8.2.

Additional tasks may also be included in the schedule as they become necessary. One such task would be a proposal to modify performance standards for affected soil and/or ground water based upon a site specific risk assessment. A second potential task would be a proposal for the evaluation of alternative remedial strategies due to technical impracticability of the selected remediation technologies.

8.2 Notification Requirements

To the maximum extent possible, Transwestern will provide at least fifteen (15) working days advance notice of any sample collection events conducted in the course of soil and ground water assessment activities and for all routine ground water monitoring activities. When it is not possible to provide the full 15-day notice, Transwestern will provide as much advance notice as possible, but in no event less than forty-eight (48) hours telephonic or facsimile transmission notice prior to the field activities.

8.3 Routine Reporting Requirements

Annual progress reports will be prepared and submitted to the NMED for review from the time field work begins until corrective action is complete. The annual progress reports will be submitted by the 31st day of March for the preceding year with the first report submitted by March 31, 1997. The progress reports will provide a means of tracking the schedule for investigative and corrective action activities and explain the need for any modifications to the proposed project schedule. The reports will document work performed during the preceding period and will include the following information:

- copies of the results of all laboratory analyses and a summary of results
- discussion of all hydrogeologic data collected
- discussion of the performance and efficiency of each aspect of the remediation program
- discussion of maintenance procedures performed
- discussion of progress of remediation toward closure
- discussion of activities anticipated during the next reporting period.

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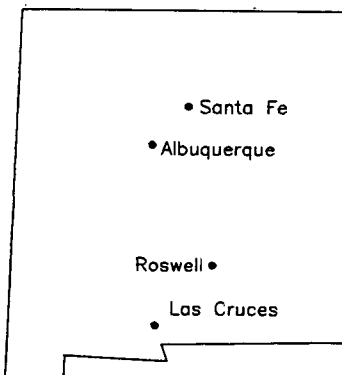
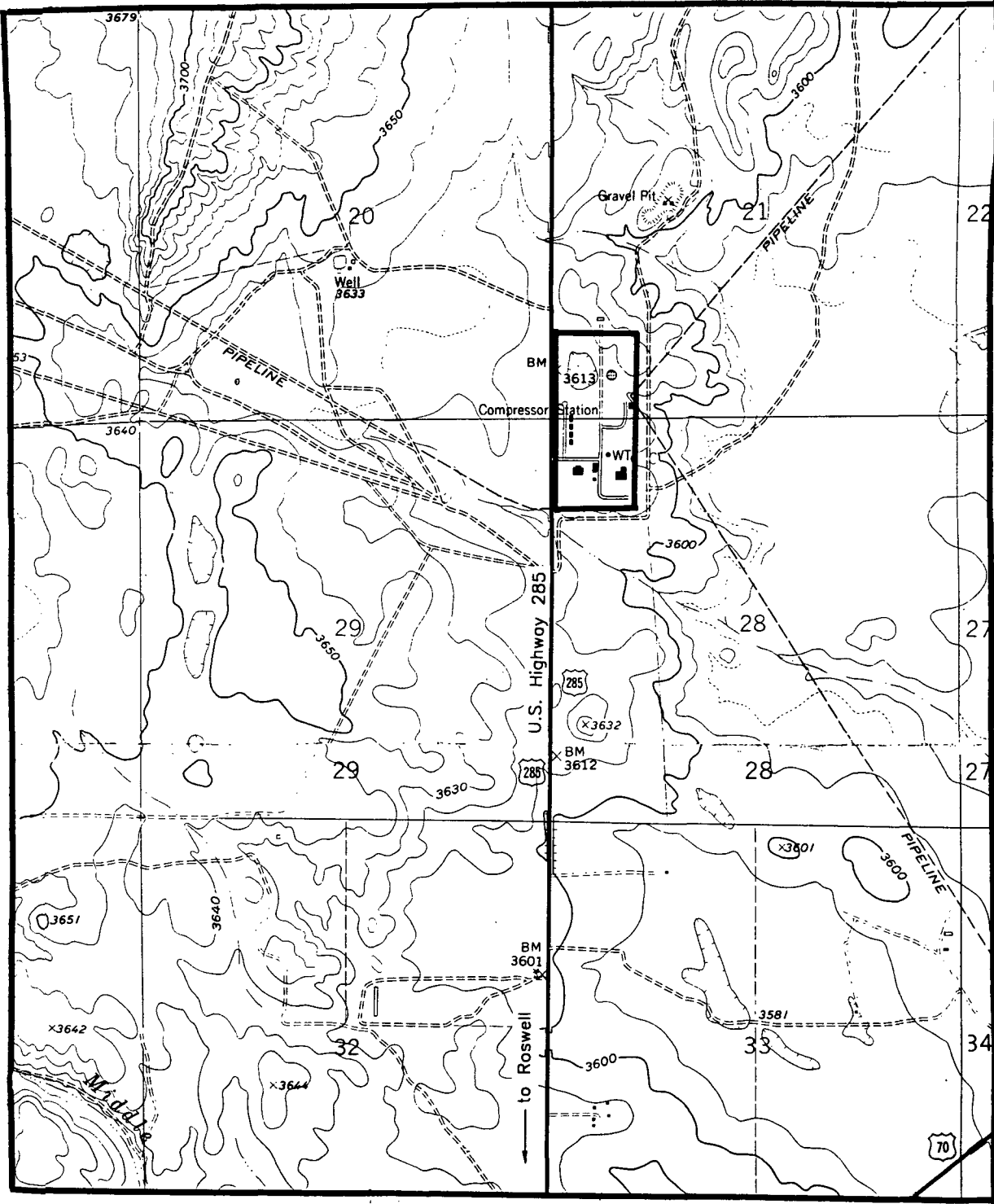
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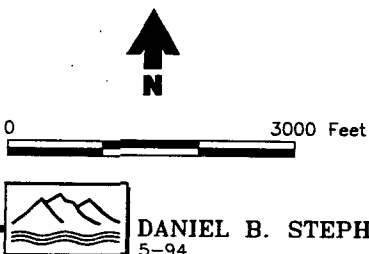
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Source: U.S. Geological Survey, 1982
Panther Hill, Roswell North
7 1/2 Minute Topographic
Quadrangle Map.

ROSWELL COMPRESSOR STATION Location Map



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5-94 JN 4115

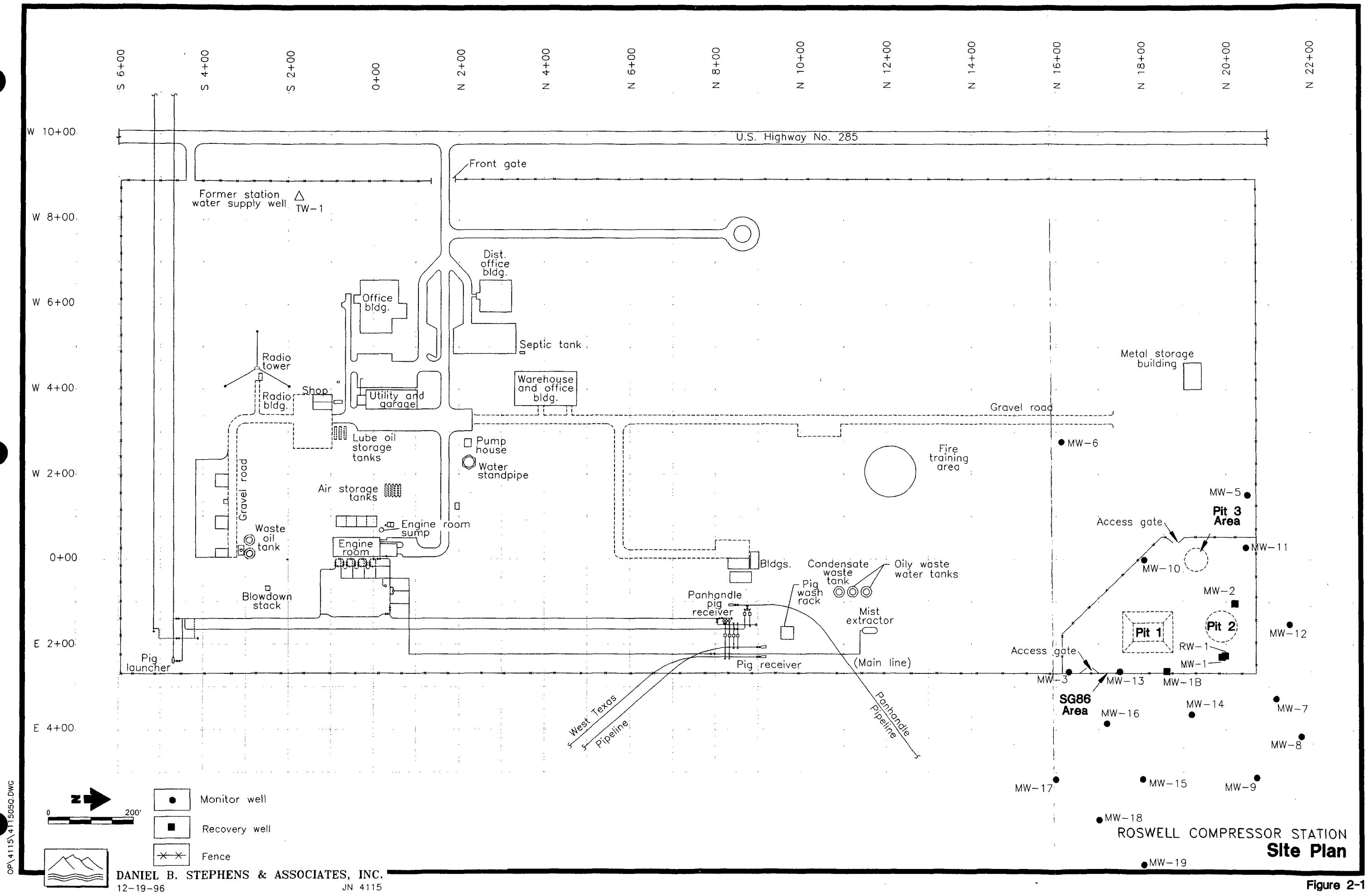
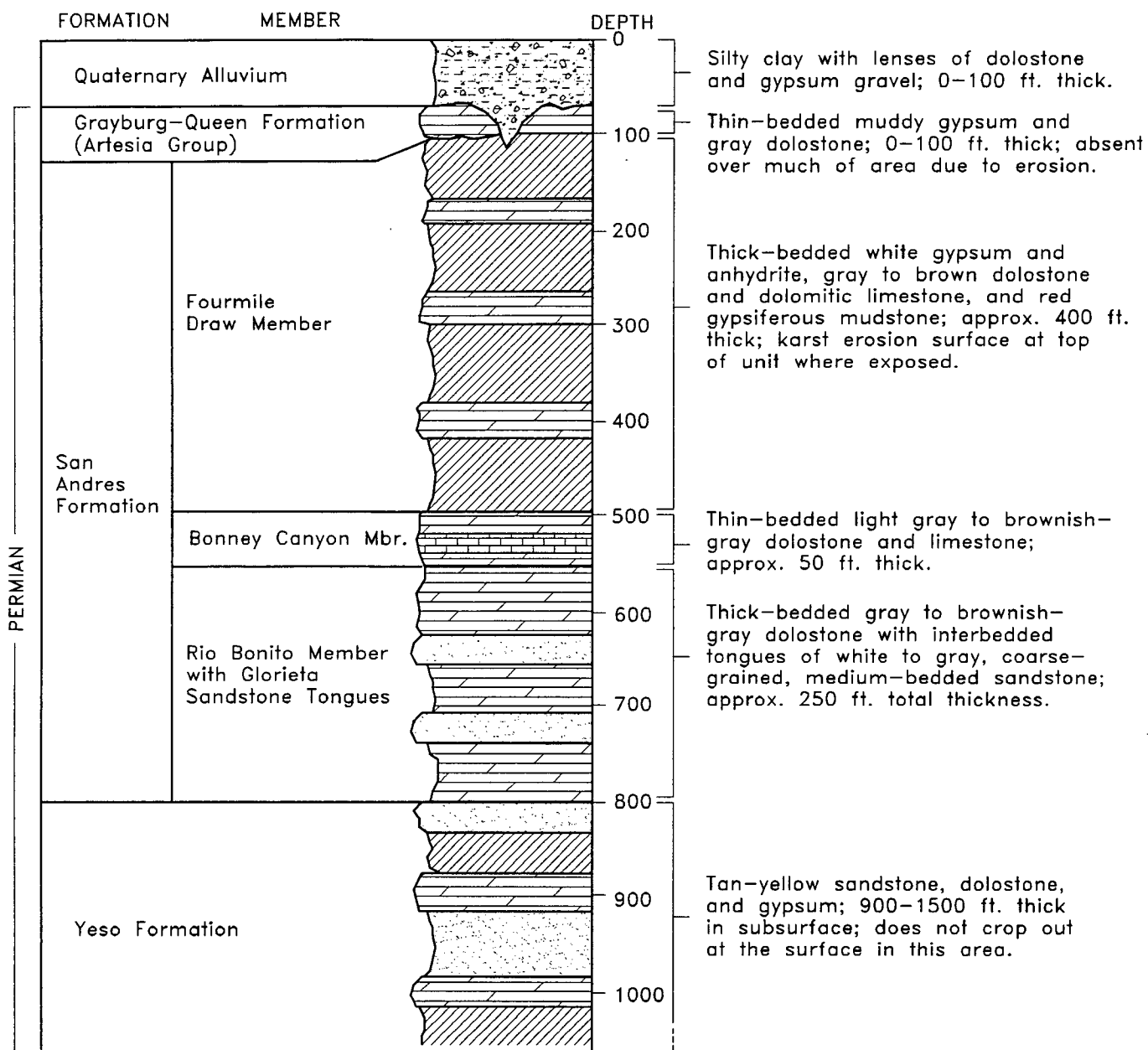







Figure 2-1



Information Source: Kelley, 1971

Explanation

	Unconsolidated Alluvium		Dolomite
	Sandstone		Gypsum
	Limestone		

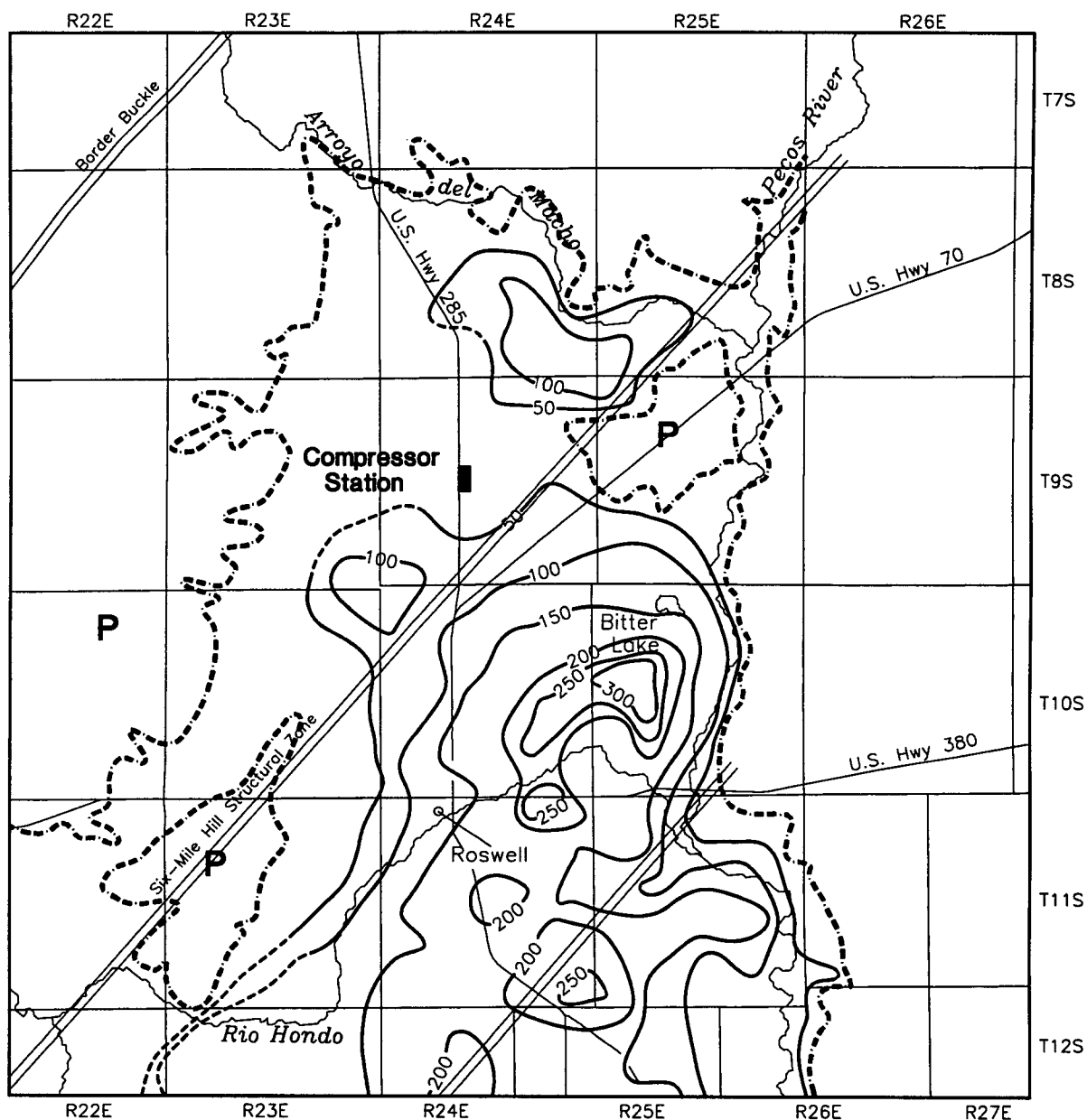


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ROSWELL COMPRESSOR STATION Generalized Stratigraphic Section Near Roswell Compressor Station

Figure 2-2

D/4115/2-2655 G



Sources: Kelley, 1971; Lyford, 1973



0 5 miles

Explanation

- Thickness of valley fill alluvium (ft)
- Approx. surface contact between Permian rocks and valley fill alluvium
- Outcrop area of Permian rocks

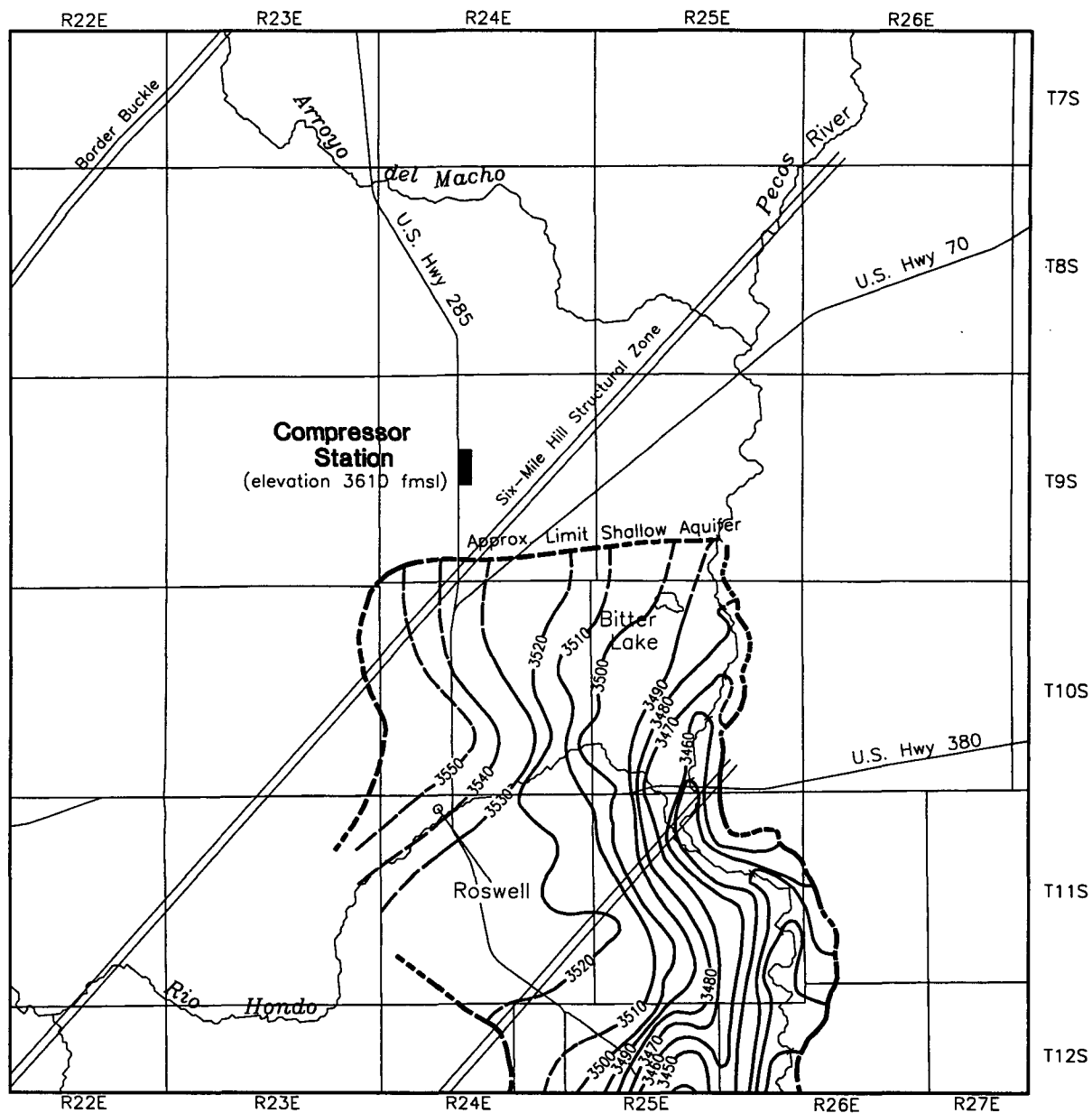


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ROSWELL COMPRESSOR STATION Approximate Thickness of Shallow Alluvial Aquifer

Figure 2-3

OP\6033\60337W.DWG



Source: Welder, 1983



0 5 miles

Explanation

- Water level contour (feet above mean sea level [fmsl])
- Approximate extent of shallow alluvial aquifer
- Structural zone (Maddox, 1968; Kelley, 1971)

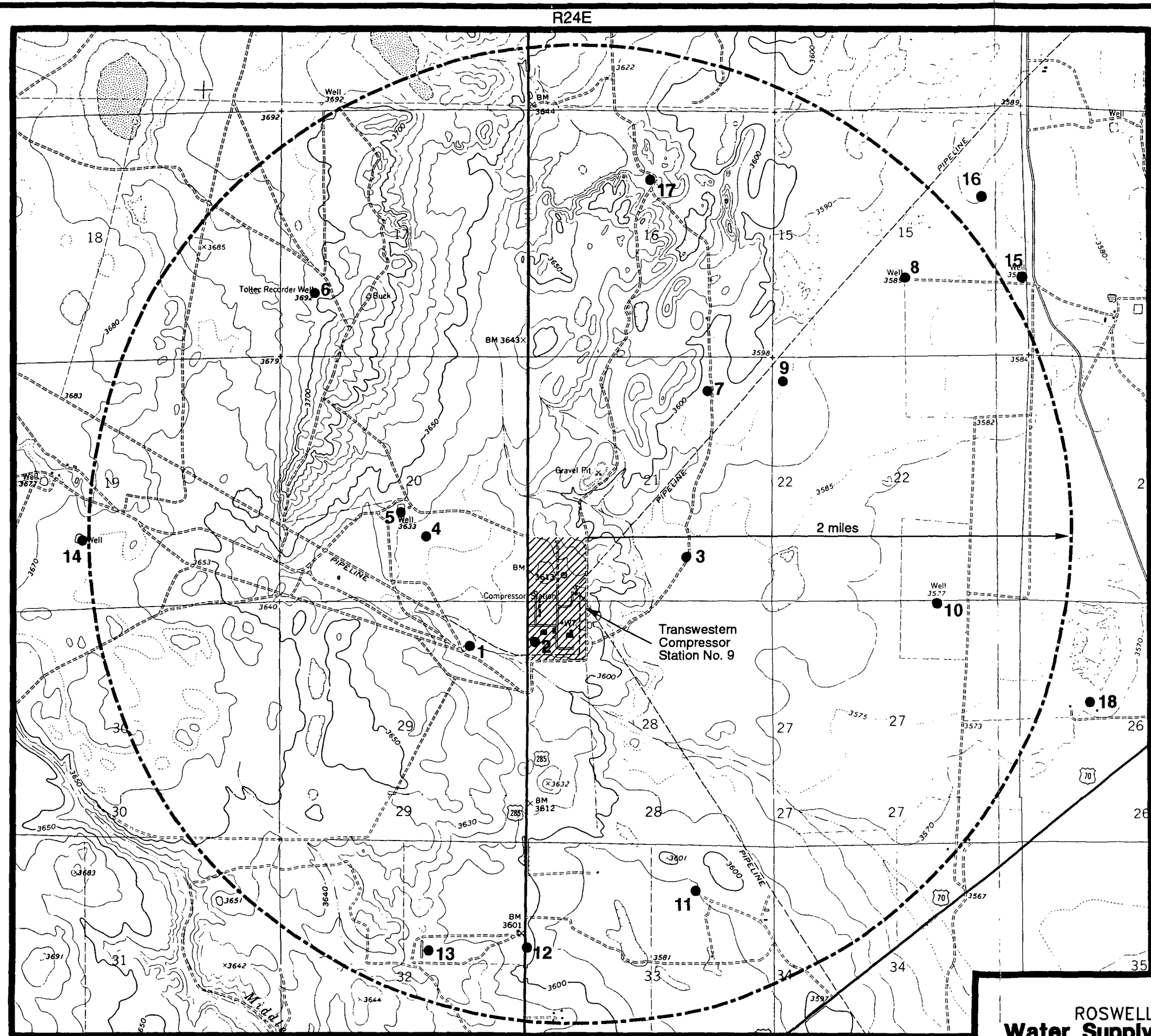


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ROSWELL COMPRESSOR STATION Water Levels In Shallow Alluvial Aquifer January 1984

Figure 2-4

OP\6033\603336W.DWG



Note: Well numbers refer to wells listed on Table 2-1.



0 2000'

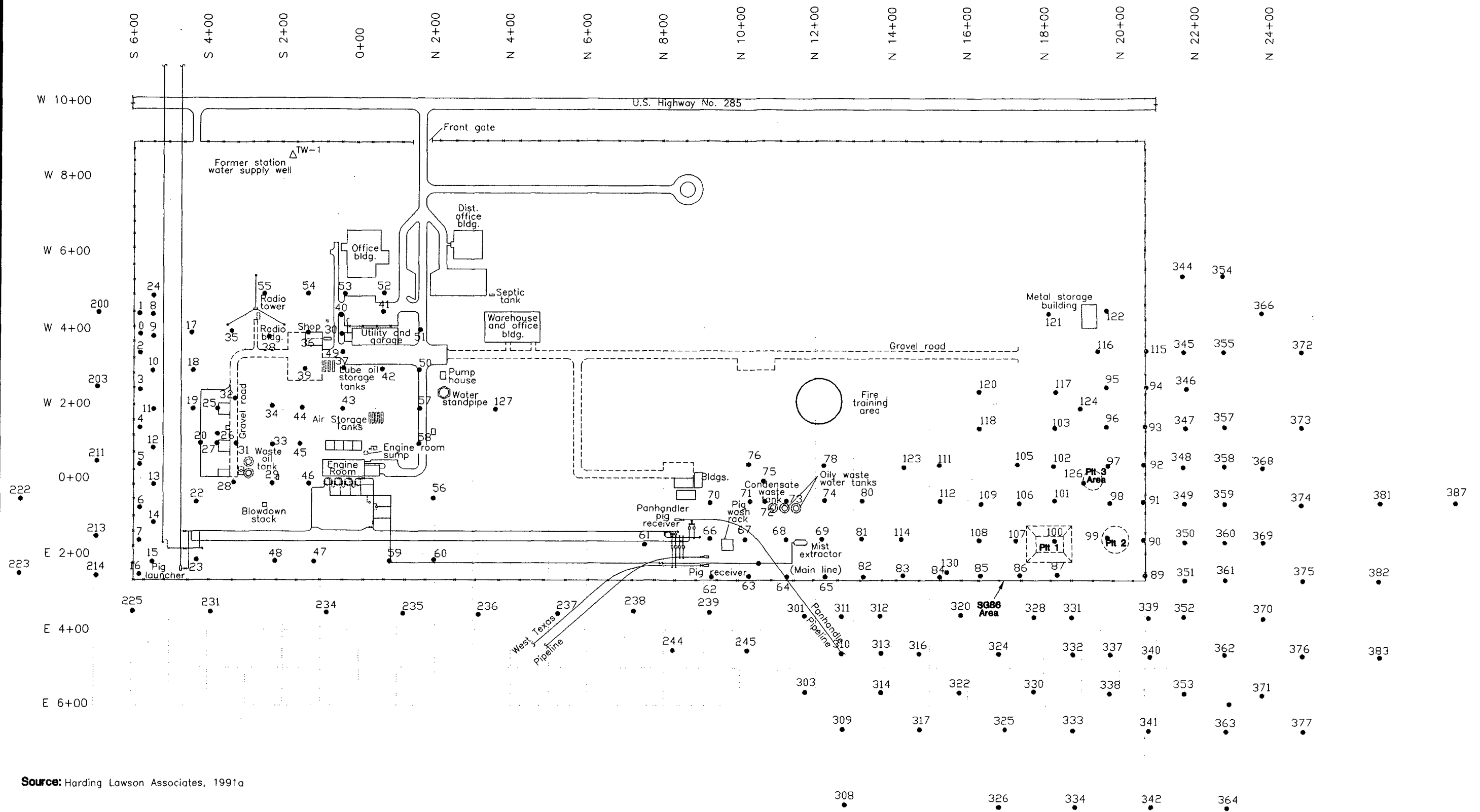


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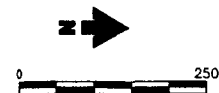
ROSWELL COMPRESSOR STATION Water Supply Well Location Map

Figure 2-5

D:\4115\2-3\SW.DWG



Source: Harding Lawson Associates, 1991a



Explanation
 • Soil vapor sample location



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ROSWELL COMPRESSOR STATION
Harding Lawson Associates
Soil Vapor Sample Locations

Figure 3-1

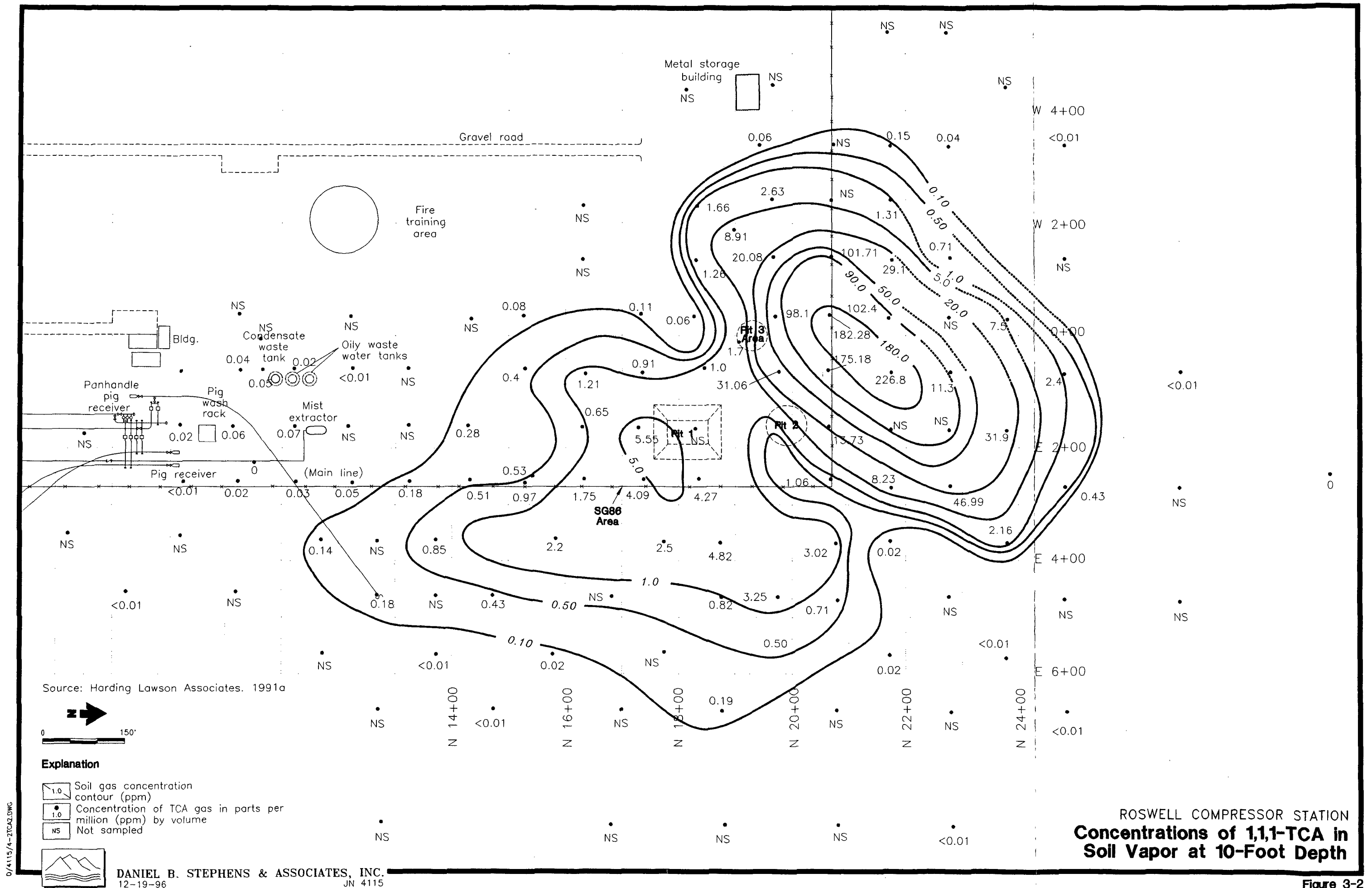
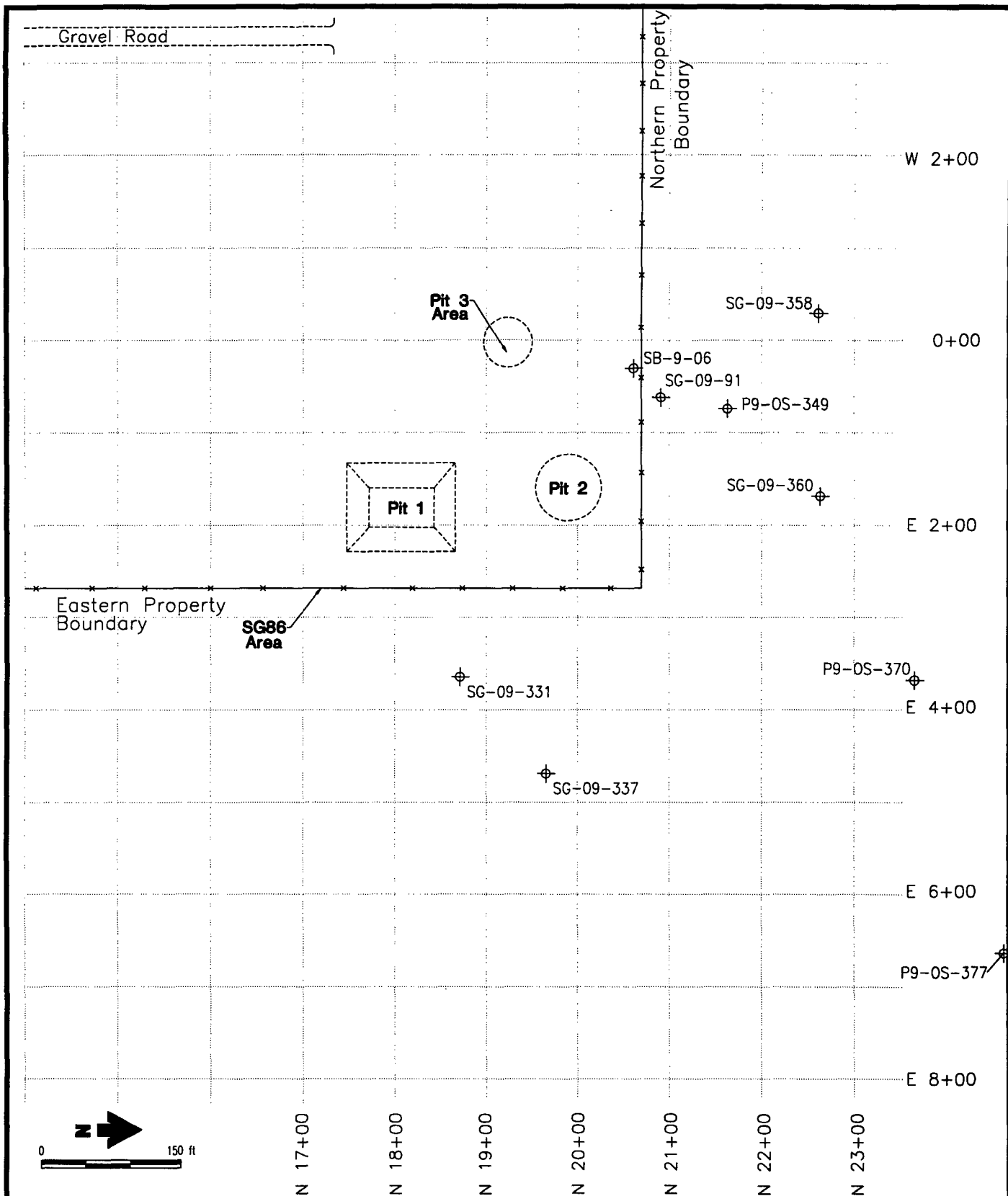




Figure 3-2



Explanation

-  Soil boring
-  Fence

Source: Harding Lawson Associates, 1991b



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12-12-96 JN 6033

ROSWELL COMPRESSOR STATION Locations of Harding Lawson Associates Soil Borings

Figure 3-3

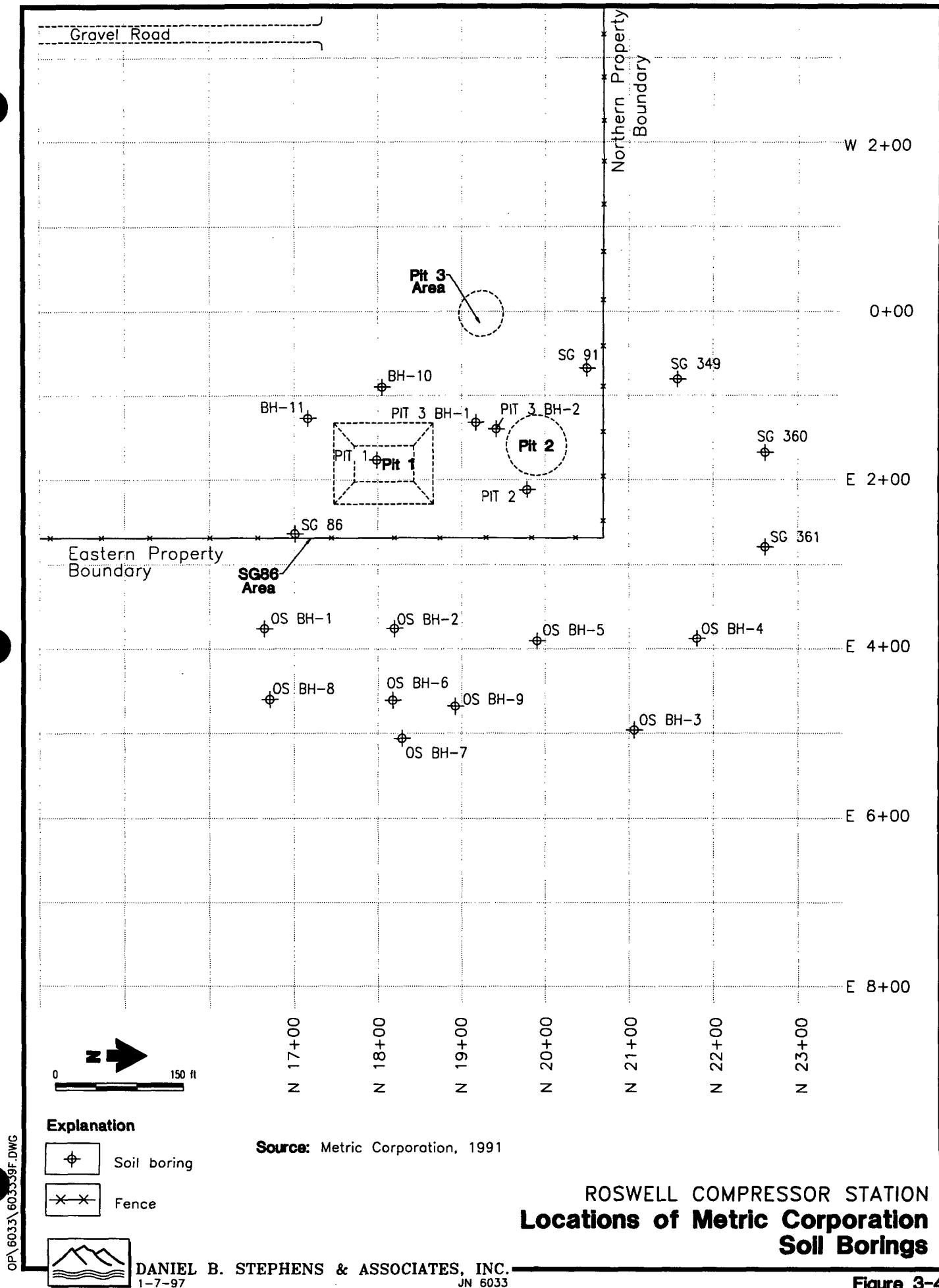
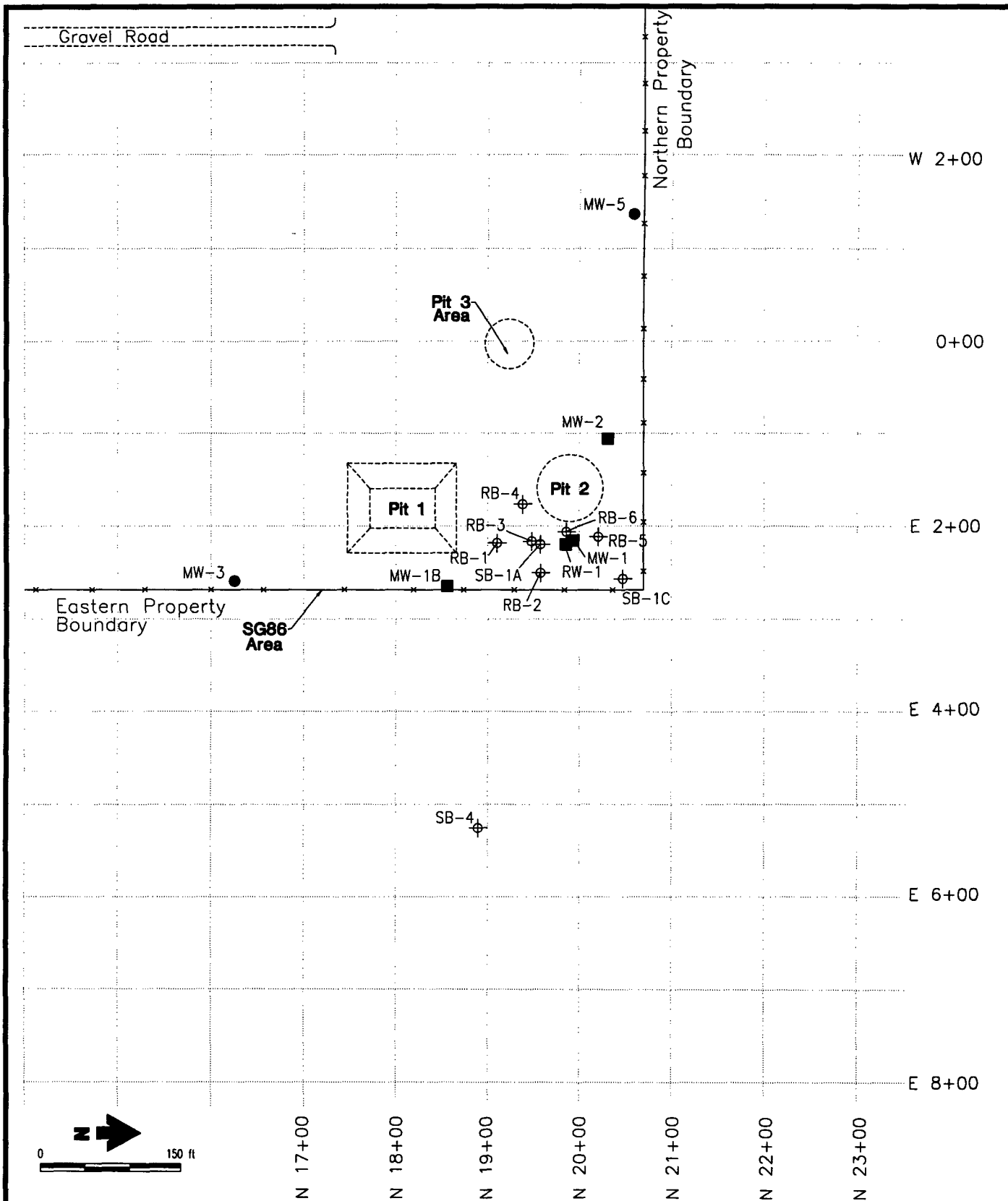


Figure 3-4



Explanation



Soil boring



Monitor well



Fence



Recovery well



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Source: Brown & Root Environmental, 1993;
Halliburton-NUS Environmental Corp., 1992

**ROSWELL COMPRESSOR STATION
Locations of Halliburton and Brown & Root
Soil Borings and Wells**

Figure 3-5

OP\6033\603341F.DWG

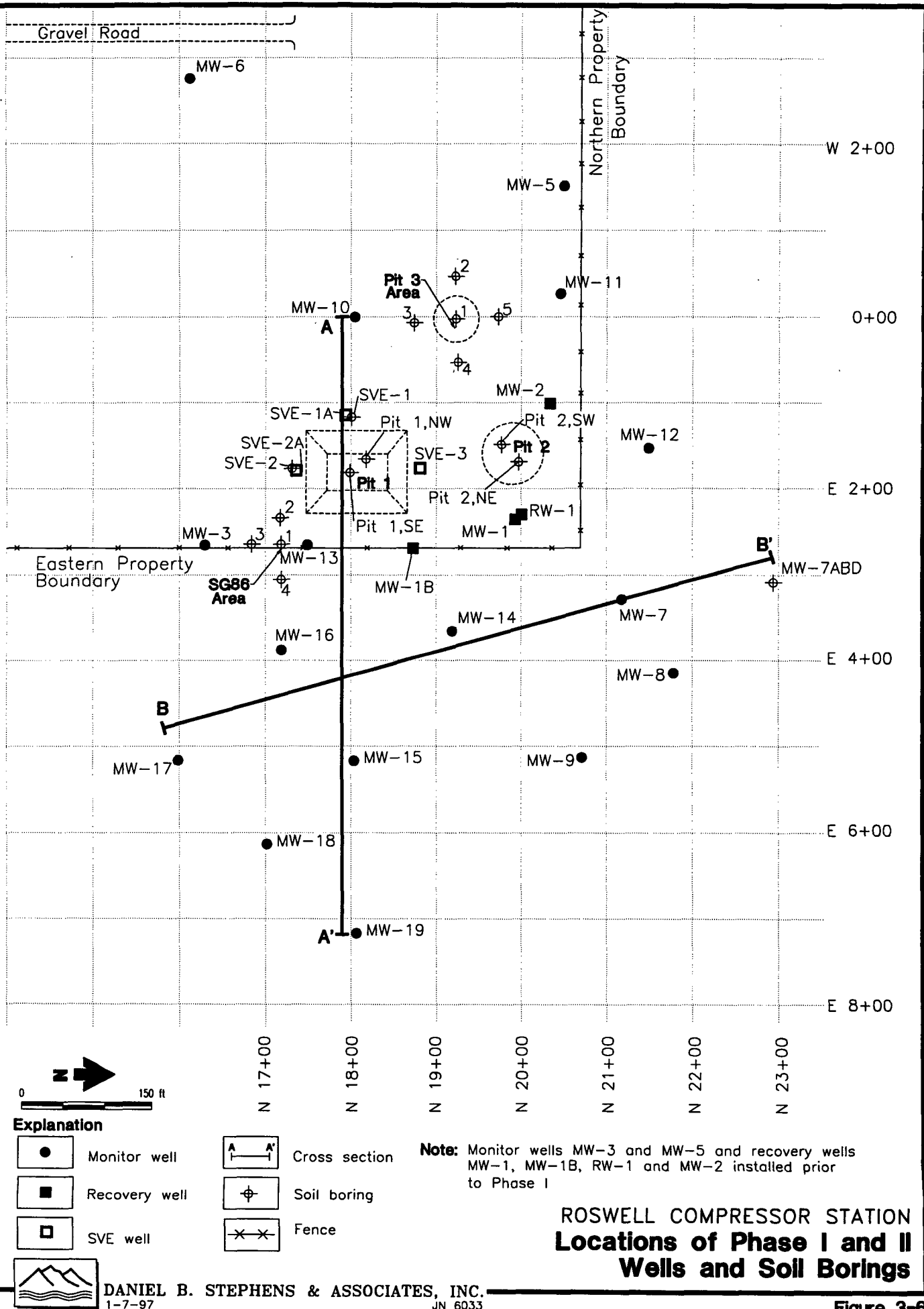
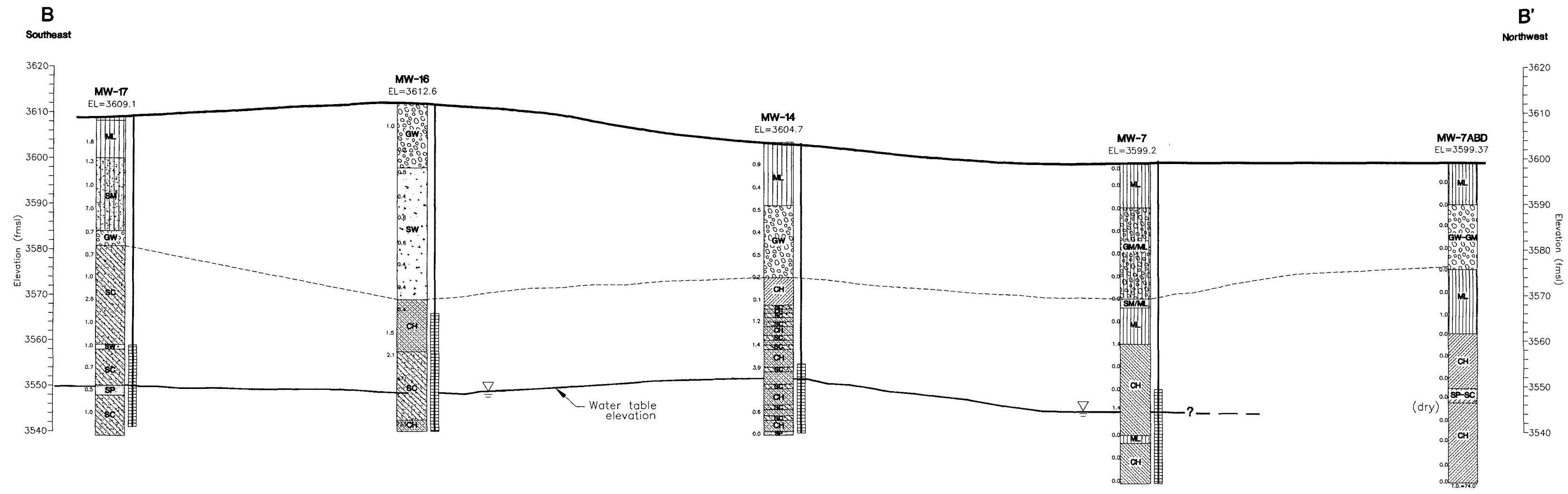


Figure 3-6



Horizontal Scale: 1" = 50'
Vertical Scale: 1" = 20'

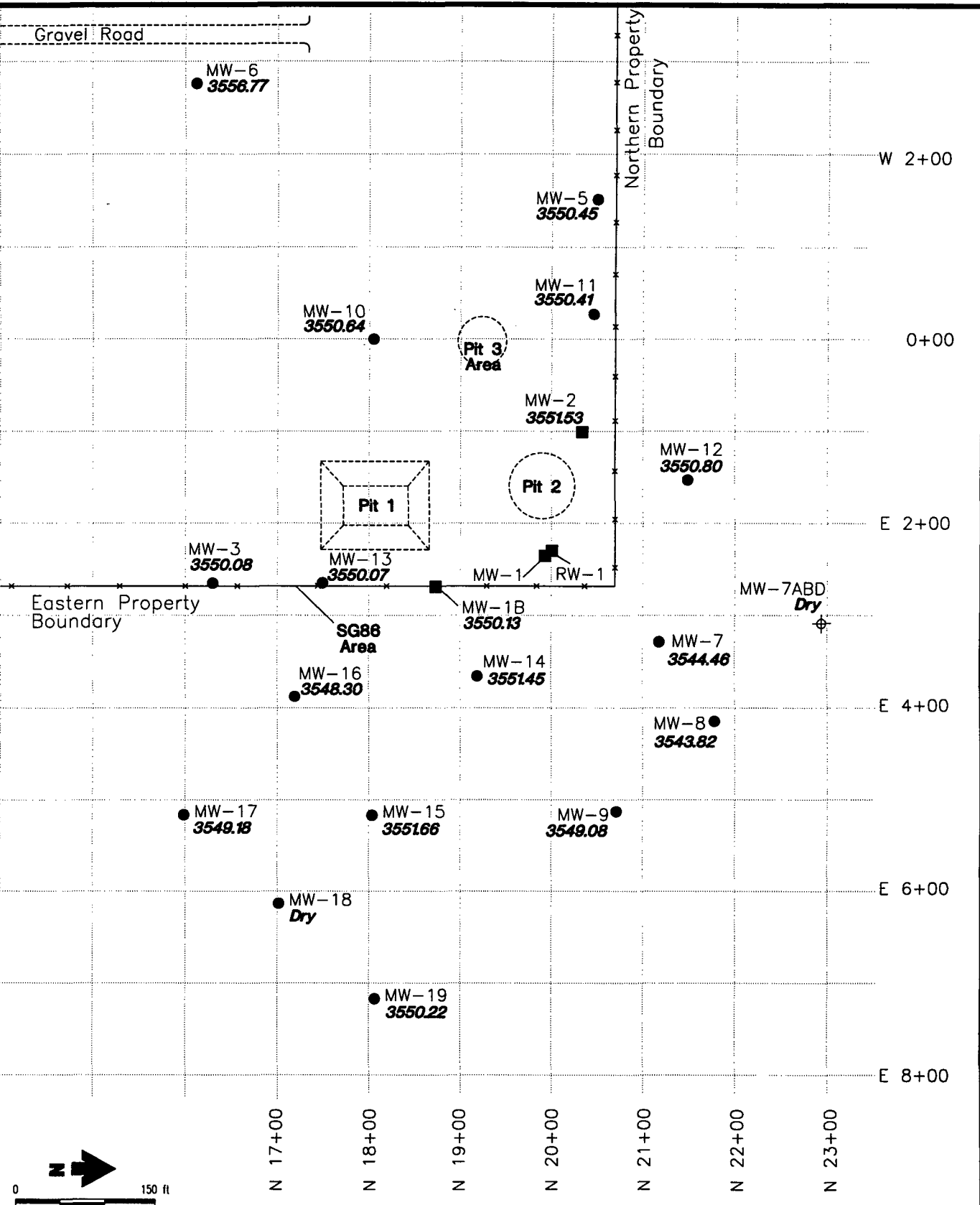
- | | | | | | |
|--|------------------------------------|--|---|--|---|
| | Ground surface | | Gypsum | | SM - Silty sands, sand-silt mixtures |
| | Well screen | | GW - Gravel, well graded, gravel-sand mixture, little or no fines | | SC - Clayey sands, sand-clay mixtures |
| | Water table elevation (fmsl) | | GM - Silty gravels, gravel-sand-silt mixtures | | ML - Inorganic silts and very fine sands, rock flour, silty or clayey fine sands, or clayey silt with slight plasticity |
| | Organic vapor meter reading (ppmv) | | SW - Well graded sands, gravelly sand, little or no fines | | CH - Inorganic clays of high plasticity |
| | Top of clay | | SP - Poorly graded sands, gravelly sands, little or no fines | | |

ROSWELL COMPRESSOR STATION
Hydrogeologic Cross Section B-B'

Figure 3-9

OP:\6033\603350R.DWG

OP\6033\6033T2W.DWG



Explanation



Monitor well



Recovery well



Water table elevation (fmsl)

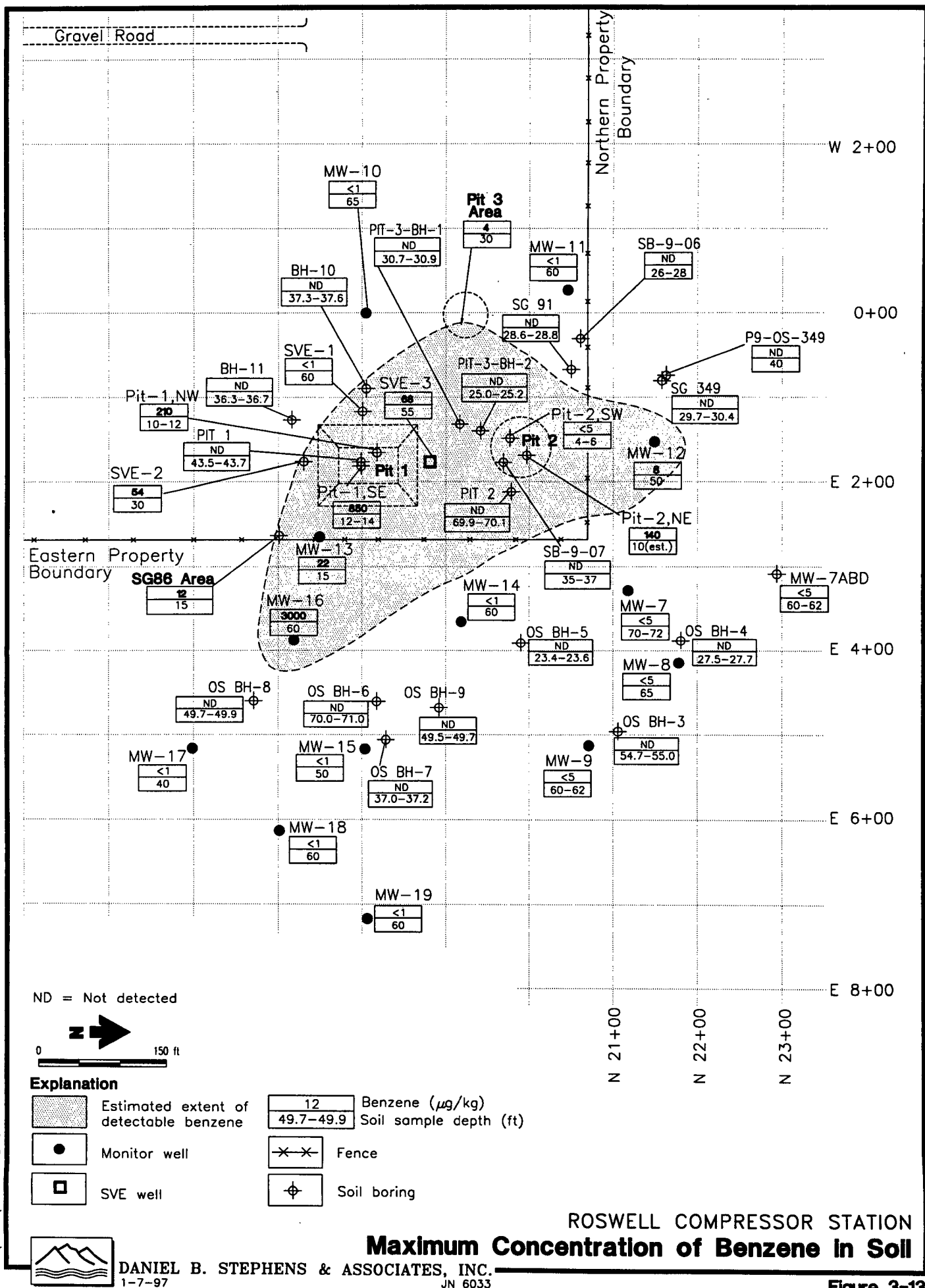


Fence

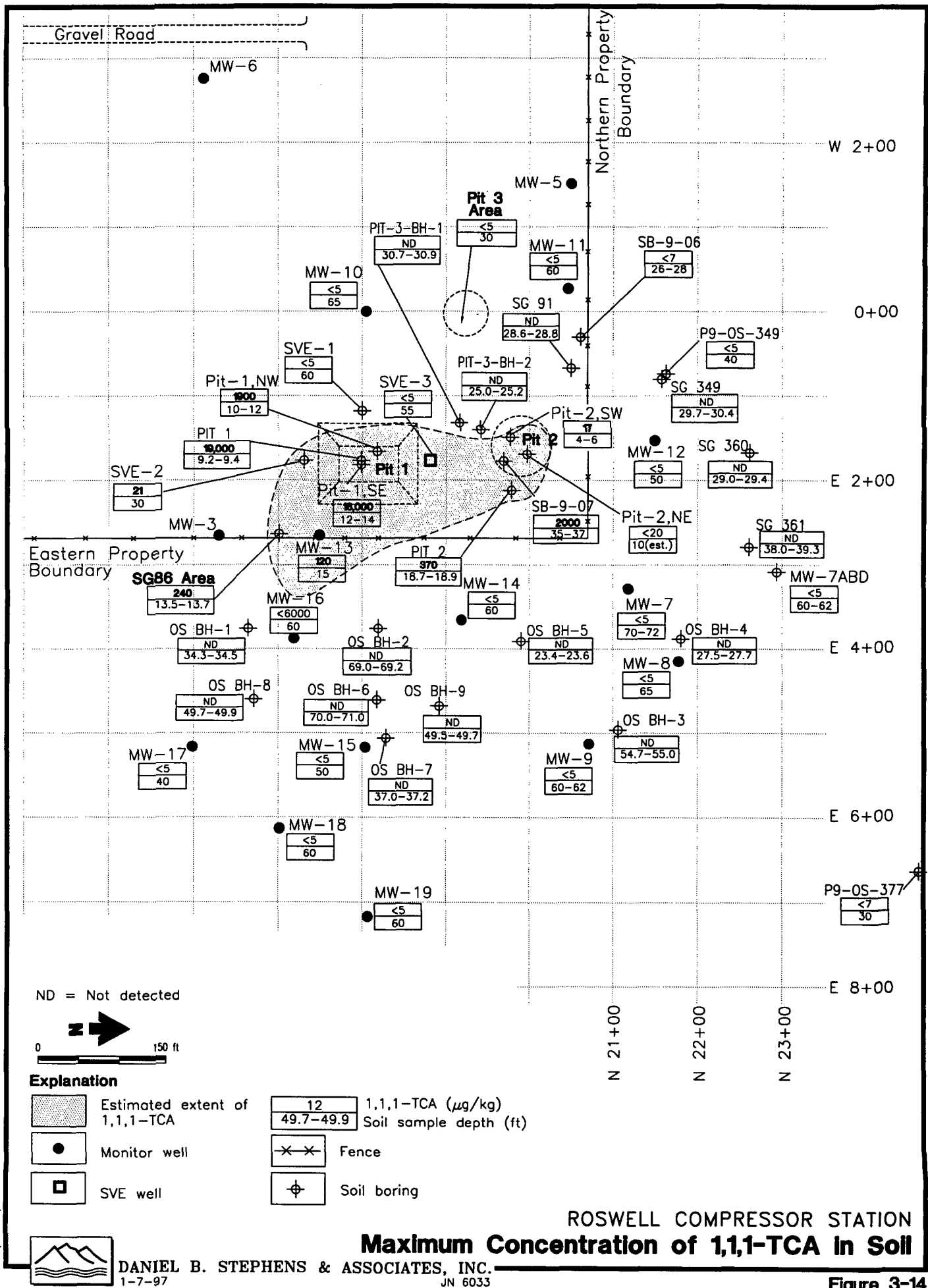
ROSWELL COMPRESSOR STATION
Water Table
Elevations for the Uppermost Aquifer
September 27, 1996

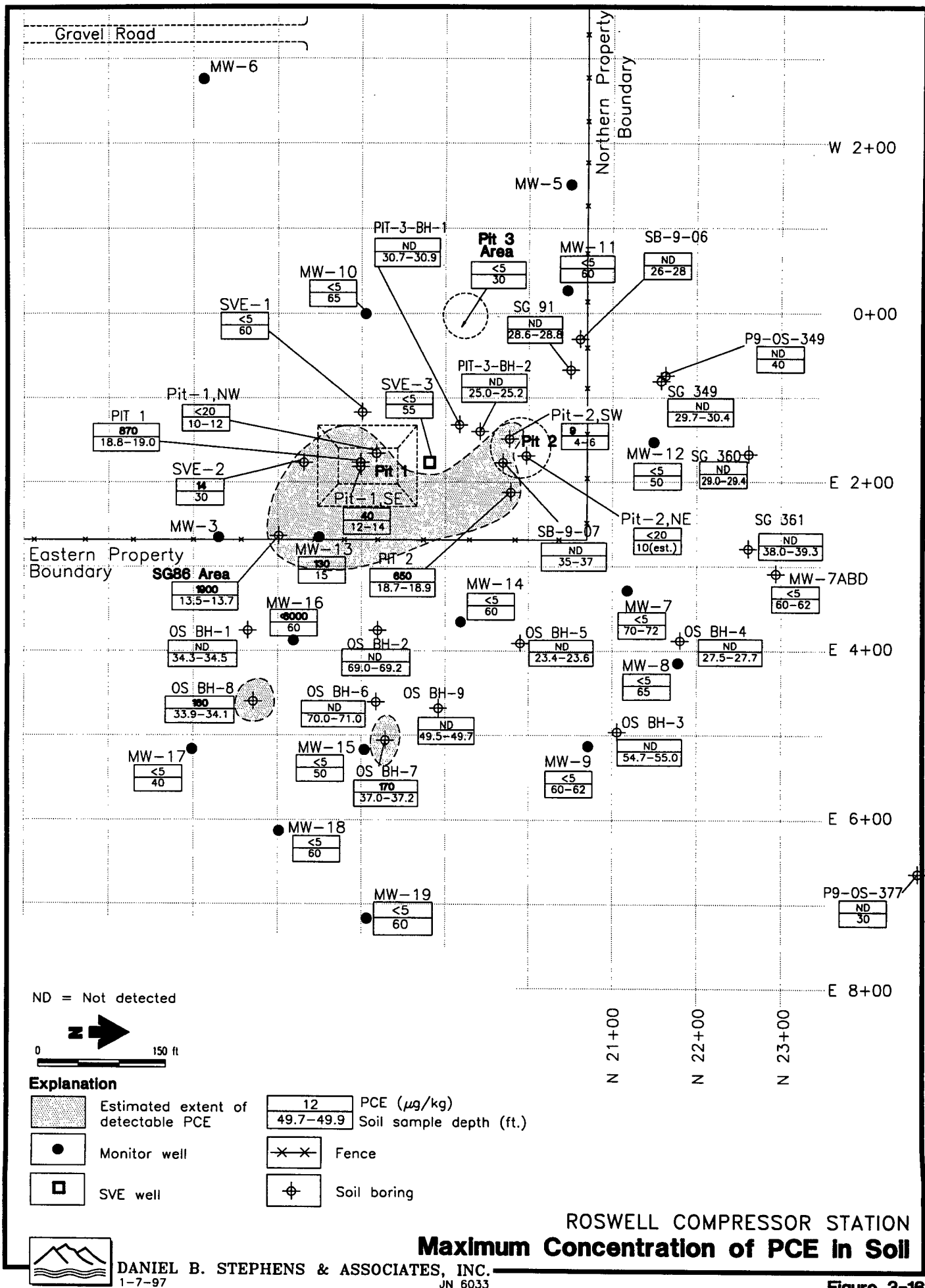
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 12-19-96 JN 6033

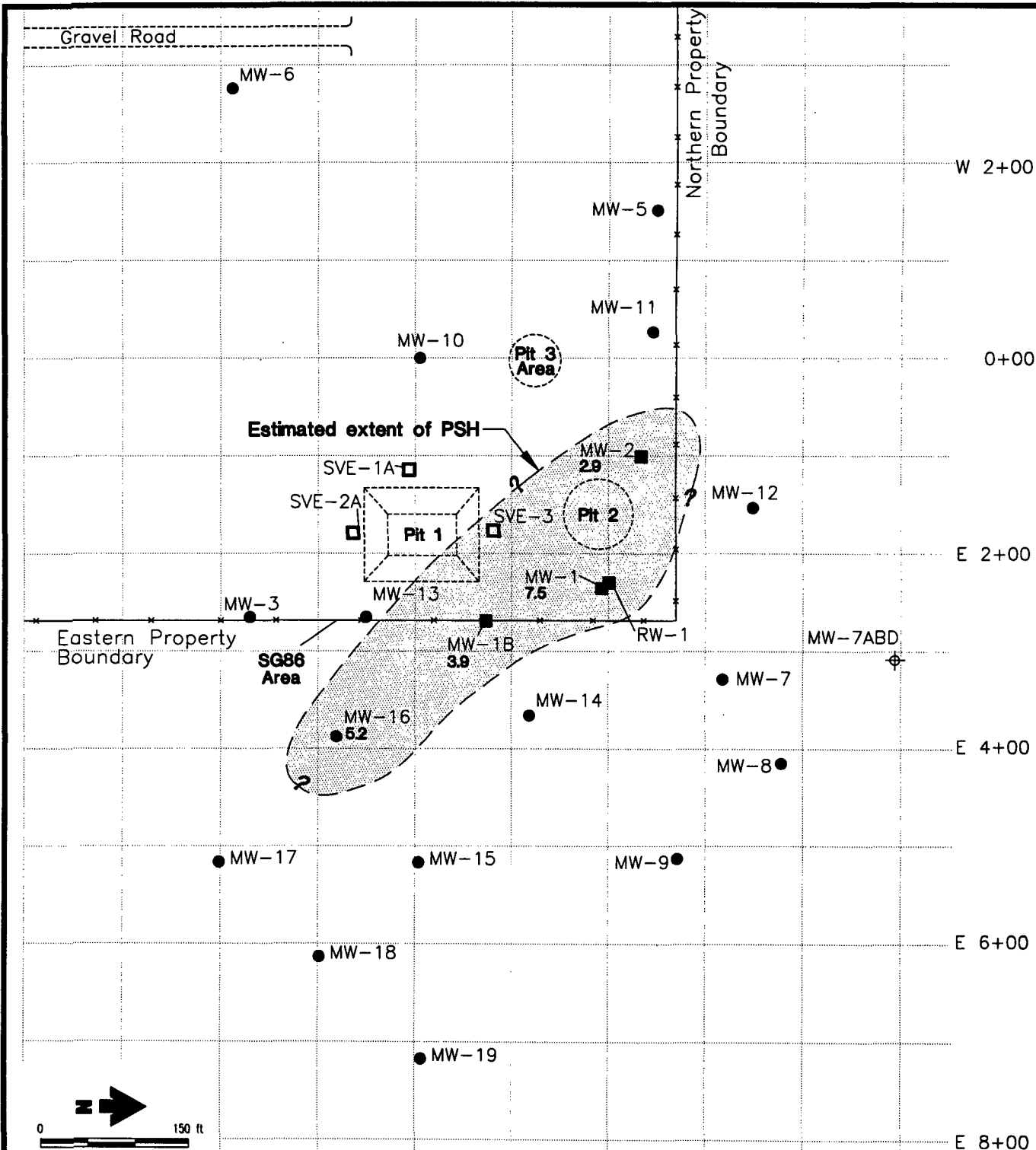
Figure 3-10



OP\6033\603346W.DWG







Explanation

- | | | | | | | | | |
|--|--|---------|---------|---------|---------|---------|---------|---------|
| | Monitor well | N 17+00 | N 18+00 | N 19+00 | N 20+00 | N 21+00 | N 22+00 | N 23+00 |
| | Recovery well | | | | | | | |
| | SVE well | | | | | | | |
| | Soil boring | | | | | | | |
| | Fence | | | | | | | |
| | Estimated extent of PSH | | | | | | | |
| | 3.9 Phase-separated hydrocarbon (PSH) thickness (ft) | | | | | | | |

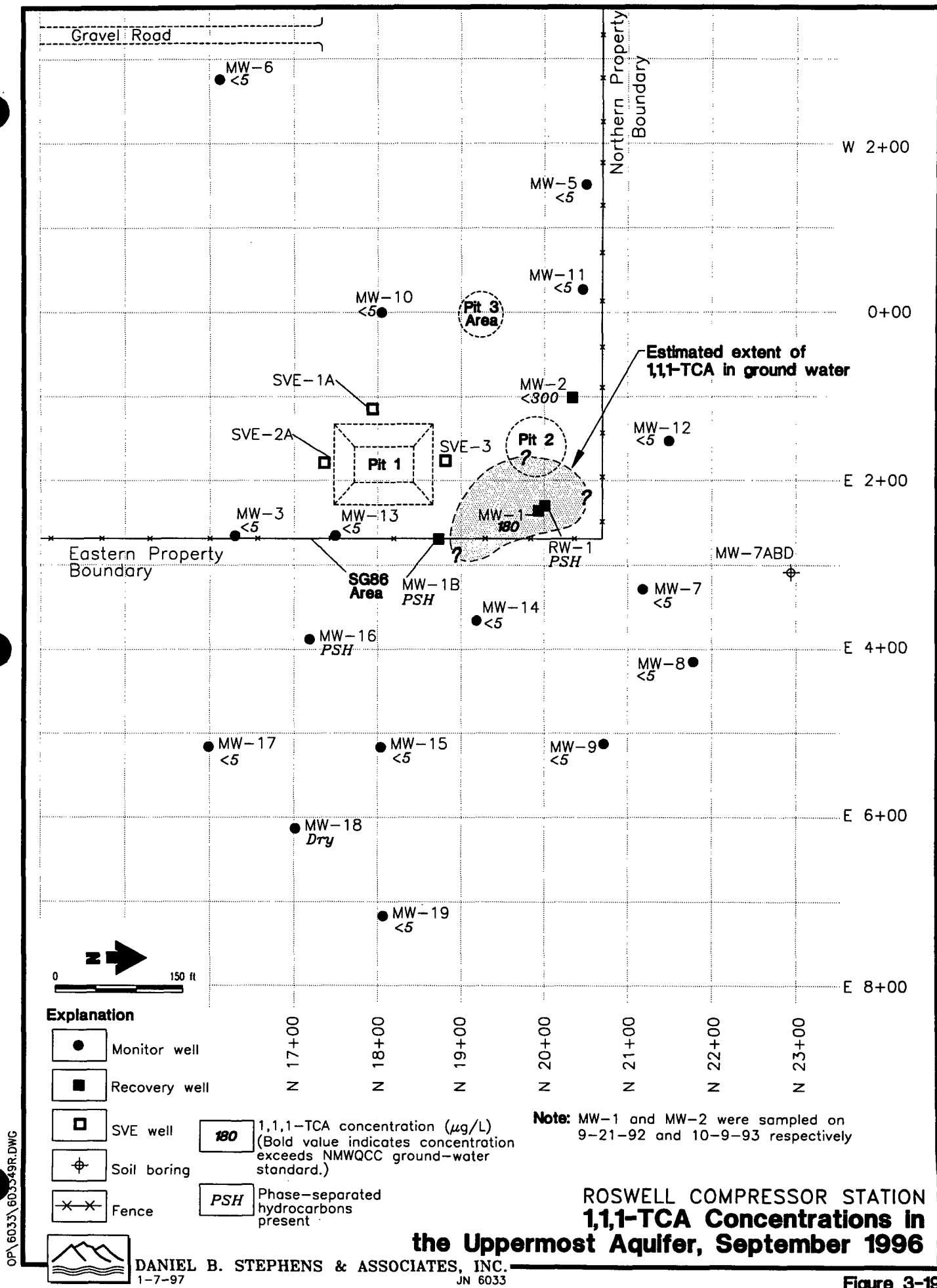
ROSWELL COMPRESSOR STATION
Distribution of Phase-Separated Hydrocarbons
on the Uppermost Aquifer, September 23, 1996

OP\6033\60332W.DWG



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 1-7-97 JN 6033

Figure 3-17



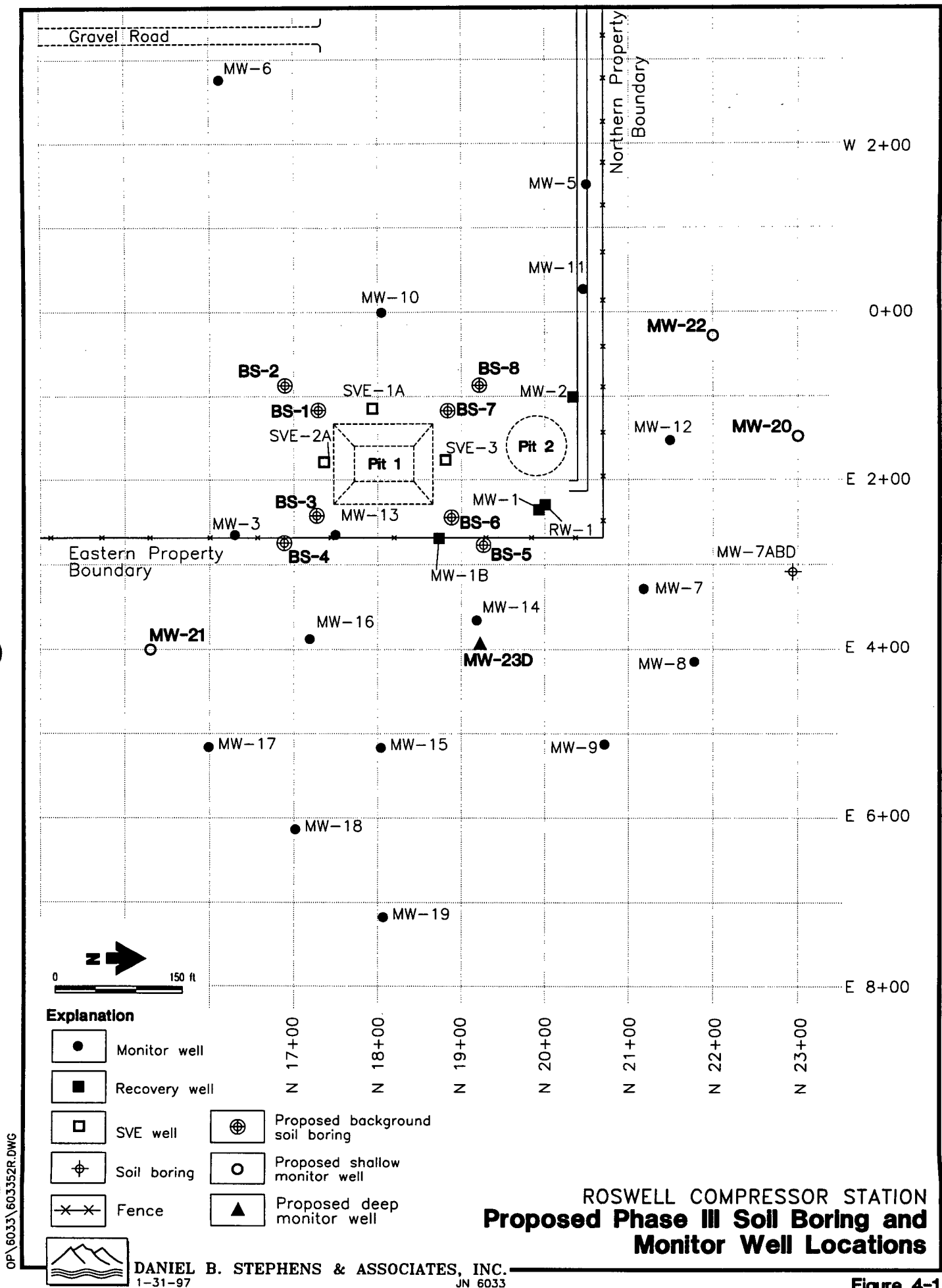
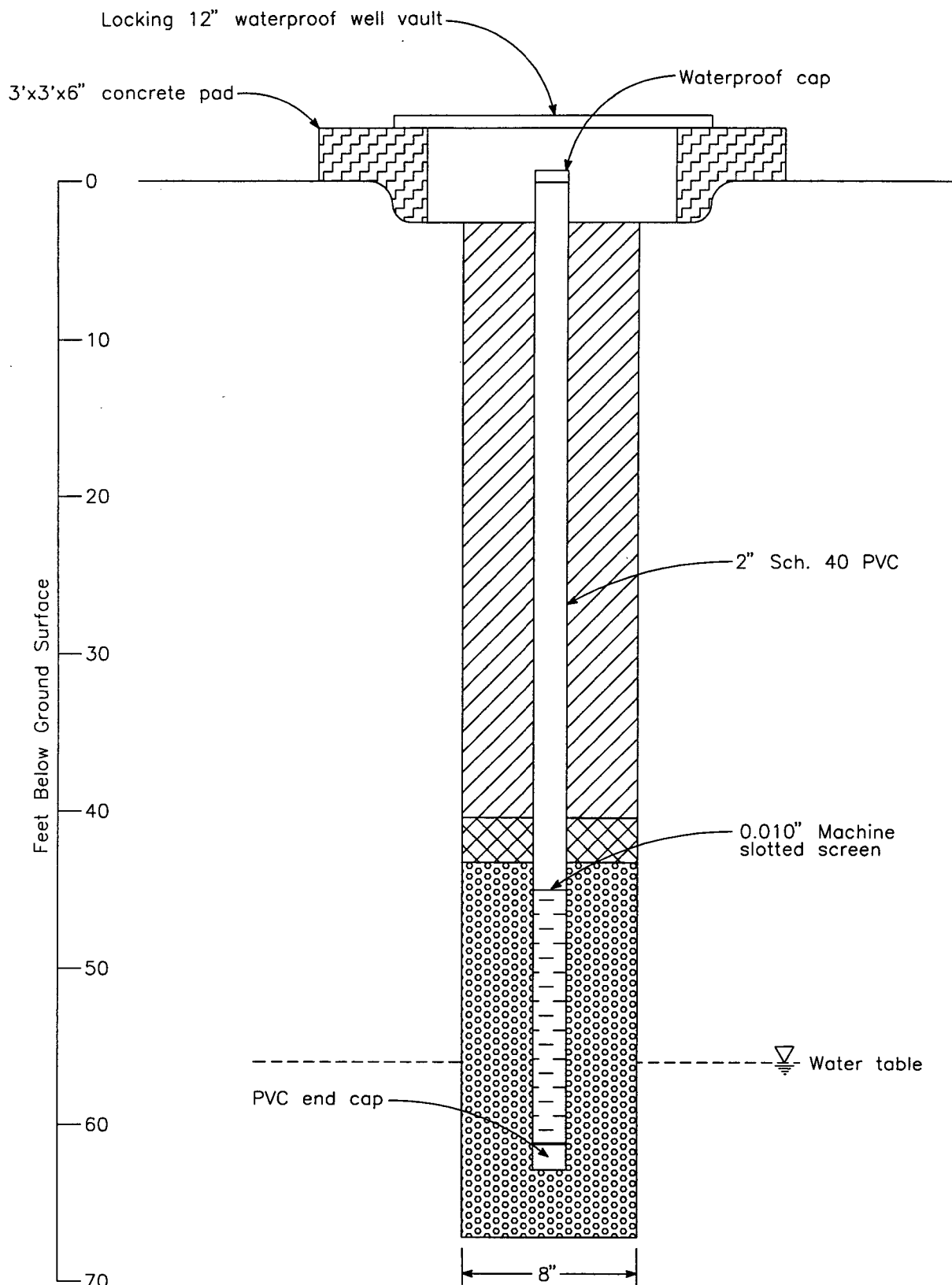





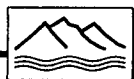
Figure 4-1



Note: Actual depths and screened intervals will be determined following initiation of ground-water assessment plan.

-  Cement/bentonite grout
-  Hydrated bentonite plug
-  20/40 Silica sand pack

Not to Scale



DANIEL B. STEPHENS & ASSOCIATES, INC.
12-19-96 4115

ROSWELL COMPRESSOR STATION Monitor Well Schematic

Figure 5-1



DANIEL B. STEPHENS & ASSOCIATES, INC.

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Table 2-1. Water Supply Wells Located Within 2 Miles of Roswell Compressor Station No. 9

Well Number ^a	Latitude	Longitude	Well ID	Well Depth (ft)	Depth to Water (ft) / Year	Aquifer	Distance From Site (miles)	Date Drilled	Use	Status
1	333028	1043119	09S.24E.29.223313	NA	63 / 1961	San Andres Fm	0.66	NA	Livestock	Abandoned; plugged
2	333031	1043103	09S.24E.28.113132	352	65 / 1994	San Andres Fm	0.49	09/17/69	Observation	Abandoned; open
3	333050	1043025	09S.24E.21.43213	58	15 / 1937	Alluvial Fill	0.45	NA	Livestock	Abandoned; plugged
4	333053	1043134	09S.24E.20.413	NA	NA	San Andres Fm	0.63	NA	NA	Abandoned; not found
5	333059	1043135	09S.24E.20.32422	370	63 / 1948	San Andres Fm	0.73	NA	Industrial	In use
6	333145	1043159	09S.24E.17.331222	208	119 / 1948	Artesia Group	1.54	NA	Observation	NA
7	333128	1043022	09S.24E.21.2124	NA	NA	NA	0.83	NA	Livestock	Abandoned; plugged
8	333149	1042931	09S.24E.15.41313	425	47 / 1961	San Andres Fm	1.72	03/18/59	Irrigation	In use
9	333128	1043004	09S.24E.22.1113	386	281 / 1968	San Andres Fm	1.06	NA	Livestock	Abandoned; open
10	333041	1042924	09S.24E.27.21212	NA	NA	NA	1.50	NA	Irrigation	Not in use
11	332934	1043021	09S.24E.33.21443	510	53 / 1965	San Andres Fm	1.60	NA	Irrigation	NA
12	332927	1043106	09S.24E.32.242443	NA	43 / 1961	Artesia Group	1.66	NA	Livestock	Abandoned
13	332921	1043134	09S.24E.32.233324	116	72 / 1960	San Andres Fm	1.86	NA	Livestock	NA
14	333055	1043236	09S.24E.19.41331	550	126 / 1962	San Andres Fm	2.01	NA	Irrigation	NA
15	333151	1042903	09S.24E.15.42442	375	55 / 1959	San Andres Fm	2.08	12/15/58	Domestic	Abandoned; open
16	333207	1042914	09S.24E.15.24321	365	66 / 1966	San Andres Fm	2.12	11/15/65	Irrigation	Abandoned; has pump
17	333211	1043037	09S.24E.16.1422	NA	NA	NA	1.53	NA	Irrig/Stock	In use
18	333021	1042845	09S.24E.26.1431	NA	NA	NA	2.15	NA	Domestic	In use

Sources: USGS Ground-Water Site Inventory; field verification by Transwestern using GPS.

^a Well numbers correspond to well locations shown on Figure 2-5.

NA = Not available



Table 3-1. Summary of Abandoned Soil Borings
Roswell Compressor Station No. 9
Page 1 of 3

Boring No.	Source ^a	Date of Completion	Location		Measuring Point ^b Elevation (fmsl)	Total Depth (ft bgs)
			North	East		
SB-9-06	HLA	04/03/90	NA	NA	NA	29.0
SB-9-07	HLA	04/03/90	NA	NA	NA	38.5
P9-OS-349	HLA	05/02/90	NA	NA	NA	40.0
P9-OS-377	HLA	05/02/90	NA	NA	NA	30.0
SG-09-91	HLA	05/15/90	NA	NA	NA	33.0
SG-09-331	HLA	05/16/90	NA	NA	NA	43.0
SG-09-337	HLA	05/17/90	NA	NA	NA	33.0
SG-09-358	HLA	05/17/90	NA	NA	NA	30.0
SG-09-360	HLA	05/16/90	NA	NA	NA	34.5
SG-09-370	HLA	05/16/90	NA	NA	NA	24.0
Pit 1	Metric	07/16/91	1798	176.6	3615.72	47.8
Pit 2	Metric	07/17/91	1995	216.6	3615.72	71.6
Pit 3 (BH-1)	Metric	07/18/91	1918	131.5	3615.71	32.8
Pit 3 (BH-2)	Metric	07/18/91	1948	138.5	3615.68	29.5
SG 86	Metric	07/22/91	1710	268.2	3613.52	40.7
SG 91	Metric	07/22/91	2053.2	66.5	3612.28	33.0
SG 349	Metric	07/25/91	2160.2	79.0	3615.56	30.4
SG 360	Metric	07/25/91	2261.5	166.8	3610.83	29.4
SG 361	Metric	07/25/91	2261.5	277.8	3610.15	41.3
OS BH-1	Metric	07/22/91	1664.9	375.9	3622.30	35.7
OS BH-2	Metric	07/24/91	1826.0	379.0	3618.39	70.6
OS BH-3	Metric	07/26/91	2108.7	495.1	3607.04	55.0
OS BH-4	Metric	07/29/91	2181.6	386.6	3604.95	31.0
OS BH-5	Metric	07/30/91	1992.0	389.5	3611.12	24.8
OS BH-6	Metric	07/30/91	1817.5	460.9	3619.15	72.6

^a HLA = Harding Lawson Associates, 1991
Metric = Metric Corporation, 1991
HB = Halliburton NUS, 1992
B&R = Brown & Root Environmental, 1993
DBS&A = Daniel B. Stephens & Associates, Inc., 1994, 1995
^b Measuring point is top of cement plug

fmsl = Feet above mean sea level
ft bgs = Feet below ground surface
NA = Not available



Table 3-1. Summary of Abandoned Soil Borings
Roswell Compressor Station No. 9
Page 2 of 3

Boring No.	Source ^a	Date of Completion	Location		Measuring Point ^b Elevation (fmsl)	Total Depth (ft bgs)
			North	East		
OS BH-7	Metric	07/31/91	1827.6	505.7	3616.69	40.3
OS BH-8	Metric	07/31/91	1671.9	460.8	3620.04	49.9
OS BH-9	Metric	08/01/91	1891.6	467.2	3614.77	49.7
BH-10	Metric	11/15/91	NA	NA	3617.33	37.8
BH-11	Metric	11/15/91	NA	NA	3617.60	37.8
SB-1A	B&R	04/20/93	NA	NA	3613.48 ^c	41.5
SB-1C	B&R	04/29/93	NA	NA	3606.08 ^c	36.0
SB-4	B&R	04/25/93	NA	NA	3604.78 ^c	75
RB-1	B&R	06/13/93	1914	222	3613.22 ^c	36.3
RB-2	B&R	06/12/93	1962	254	3611.11 ^c	34.5
RB-3	B&R	06/12/93	1953	220	3612.76 ^c	42
RB-4	B&R	06/13/93	1943	175	3614.41 ^c	39
RB-5	B&R	06/13/93	2027	213	3608.61 ^c	32
RB-6	B&R	NA	1989	206	3613.36 ^c	38.5
Pit 1, NW	DBS&A	08/18/95	1812.3	172.9	3615.68	12.0
Pit 1, SE	DBS&A	08/18/95	1798.2	181.5	3615.61	14.0
Pit 2, NE	DBS&A	08/17/95	1990.3	174.7	3614.81	20.0
Pit 2, SW	DBS&A	08/18/95	1970.1	150.2	3616.05	6.0
MW-7ABD	DBS&A	08/15/95	2289.6	306.6	3599.37	74.0
SVE-1	DBS&A	09/21/96	1800.63	117.01	3617.0	60.0
SVE-2	DBS&A	09/21/96	1730.93	176.77	3616.2	30.0
SG86-1	DBS&A	09/24/96	1718.39	264.18	3613.6	32.0
SG86-2	DBS&A	09/24/96	1717.00	233.69	3614.8	31.0
SG86-3	DBS&A	09/24/96	NA	NA	NA	31.0
SG86-4	DBS&A	09/24/96	1718.47	304.81	3613.1	30.0

^a HLA = Harding Lawson Associates, 1991
Metric = Metric Corporation, 1991
HB = Halliburton NUS, 1992
B&R = Brown & Root Environmental, 1993
DBS&A = Daniel B. Stephens & Associates, Inc., 1994, 1995
^b Measuring point is top of cement plug

^c Original survey to arbitrary datum corrected to elevations above sea level by referencing boring elevations to the surveyed elevation of MW-3 (3614.88 fmsl).

fmsl = Feet above mean sea level
ft bgs = Feet below ground surface
NA = Not available



**Table 3-1. Summary of Abandoned Soil Borings
Roswell Compressor Station No. 9
Page 3 of 3**

Boring No.	Source ^a	Date of Completion	Location		Measuring Point ^b Elevation (fmsl)	Total Depth (ft bgs)
			North	East		
Pit 3-1	DBS&A	09/18/96	1923.65	2.52	3616.7	30.0
Pit 3-2	DBS&A	09/18/96	1922.92	-46.86	3616.7	30.0
Pit 3-3	DBS&A	09/18/96	1874.31	6.83	3617.7	30.0
Pit 3-4	DBS&A	09/18/96	1925.90	52.88	3616.7	30.0
Pit 3-5	DBS&A	09/18/96	1973.38	-0.24	3616.2	30.0

^a HLA = Harding Lawson Associates, 1991

Metric = Metric Corporation, 1991

HB = Halliburton NUS, 1992

B&R = Brown & Root Environmental, 1993

DBS&A = Daniel B. Stephens & Associates, Inc., 1994, 1995

^b Measuring point is top of cement plug

fmsl = Feet above mean sea level

ft bgs = Feet below ground surface

NA = Not available



**Table 3-2. Summary of Soil Borings Completed as Wells
Roswell Compressor Station No. 9
Page 1 of 2**

Well No.	Source ^a	Date of Completion	Location ^b (ft)		Measuring Point Elevation ^c (fmsl)	Total Depth of Boring (ft bgs)	Casing Diameter (in.)	Screen Interval (ft bgs)	Top of Sand Pack (ft bgs)	Depth to Water from Measuring Point ^d (ft)	Water Table Elevation (fmsl)
			North	East							
SVE-1A	DBS&A	09/21/96	1,793.7	114.4	3616.50	30.0	2	20-30	19.0	NA	NA
SVE-2A	DBS&A	09/20/96	1735.9	178.9	3615.70	30.0	2	20-30	17.5	NA	NA
SVE-3	DBS&A	09/16/96	1881.0	176.6	3614.51	62.3	2	32.0-62.3	29.5	NA	NA
MW-1	HB	07/21/92	2,001.4	217.6	NA	68.0	4	28-68	25.2	45.08	NA
MW-1B	B&R	04/21/93	1,854.0	265.5	3,609.96	65.5	2	55-65	53	61.60	3,550.13 ^e
MW-2	B&R	04/21/93	2,034.3	102.4	3,611.76	65.0	2	55-65	53	62.00	3,551.53 ^e
MW-3	B&R	04/26/93	1,629.77	265.23	3,614.87	72.5	2	60-70	58	64.79	3,550.08
MW-5	B&R	04/28/93	2,049.70	-150.96	3,612.77	70.0	2	60-70	58	62.32	3,550.45
MW-6	DBS&A	12/01/94	1,607.4	-266.2	3,618.62	79.0	2	59.9-74.9	57.1	61.85	3,556.77
MW-7	DBS&A	08/22/95	2,118.0	328.4	3,599.20	70.5	2	50-70	48.1	54.74	3,544.46
MW-8	DBS&A	08/16/95	2,178.0	414.7	3,595.80	76.8	2	59-74	57.2	51.98	3,543.82
MW-9	DBS&A	08/18/95	2,071.4	512.9	3,599.35	70.0	2	50-70	47.9	50.27	3,549.08
MW-10	DBS&A	09/10/96	1,804.76	00.14	3,617.85	74.5	2	57-72	55.3	67.21	3,550.64
MW-11	DBS&A	09/16/96	2,046.04	-27.10	3,613.31	72.0	2	54-69	51.5	62.90	3,550.41
MW-12	DBS&A	09/11/96	2,149.13	152.94	3,606.38	64.0	2	44-64	42.0	55.58	3,550.80

^a DBS&A = Daniel B. Stephens & Associates, Inc., 1996

HB = Halliburton NUS, 1992

B&R = Brown & Root Environmental, 1993

^b Coordinates are relative to facility grid

^c Measuring point is top of PVC casing.

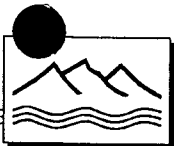
^d Depth to water measurements were made on September 27, 1996.

^e Water table elevation corrected for phase-separated hydrocarbon (PSH) thickness: measured ground-water elevation + 0.76 (PSH thickness).

fmsl = Feet above mean sea level

ft bgs = Feet below ground surface

NA = Not available



DANIEL B. STEPHENS & ASSOCIATES, INC.

ENVIRONMENTAL SCIENTISTS AND ENGINEERS

**Table 3-2. Summary of Soil Borings Completed as Wells
Roswell Compressor Station No. 9
Page 2 of 2**

Well No.	Source ^a	Date of Completion	Location ^b (ft)		Measuring Point Elevation ^c (fmsl)	Total Depth of Boring (ft bgs)	Casing Diameter (in.)	Screen Interval (ft bgs)	Top of Sand Pack (ft bgs)	Depth to Water from Measuring Point ^d (ft)	Water Table Elevation (fmsl)
			North	East							
MW-13	DBS&A	09/13/96	1,749.33	265.05	3,612.46	72.0	2	57-72	55.0	62.39	3,550.07
MW-14	DBS&A	09/10/96	1,918.87	365.40	3,604.83	64.5	2	49.5-64.5	48.0	53.38	3,551.45
MW-15	DBS&A	09/20/96	1,803.83	516.97	3,610.43	68.5	2	38.5-68.5	37.0	58.77	3551.66
MW-16	DBS&A	09/19/96	1,718.88	387.35	3,612.41	71.4	2	46.4-71.4	45.5	67.16	3,548.30 ^e
MW-17	DBS&A	09/21/96	1,598.72	516.35	3,608.48	70.0	2	53-68	50.9	59.30	3,549.18
MW-18	DBS&A	09/25/96	1,701.47	613.38	3,609.73	71.0	2	54-69	51.6	Dry	---
MW-19	DBS&A	09/26/96	1,806.45	717.41	3,608.17	69.5	2	54.5-69.5	51.0	57.95	3,550.22

^a DBS&A = Daniel B. Stephens & Associates, Inc., 1996

HB = Halliburton NUS, 1992

B&R = Brown & Root Environmental, 1993

^b Coordinates are relative to facility grid

^c Measuring point is top of PVC casing.

^d Depth to water measurements were made on September 27, 1996.

^e Water table elevation corrected for phase-separated hydrocarbon (PSH) thickness: measured ground-water elevation + 0.76 (PSH thickness).

fmsl = Feet above mean sea level

ft bgs = Feet below ground surface

NA = Not available



Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
Page 1 of 7

Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)													
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE	
Screening Criterion ^b		100 ^d	50,000 ^c					365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
SB9-6 @ 8-11'	HLA	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-6 @ 18-20'	HLA	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-6 @ 20-23'	HLA	120	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-6 @ 26-28'	HLA	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-6 @ 26-28' Tube #5	HLA	<20	ND	ND	<5	<5	ND	<5	<10	<5	ND	6	16	<5	ND	
SB9-6 @ 26-28' Tube #6	HLA	<20	ND	ND	<7	<7	ND	<7	<14	<7	ND	23 °	9 °	<7	ND	
SB9-7 @ 9-12'	HLA	1100	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-7 @ 21.5-24'	HLA	2000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-7 @ 25.5-28'	HLA	2500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-7 @ 29-32'	HLA	11000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-7 @ 29-32' Tube #7	HLA	5000	ND	ND	720	1800	ND	<1300	<2600	<1300	ND	5100	<1300	<1300	ND	
SB9-7 @ 35-37'	HLA	4600	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB9-7 @ 35-37' Tube #8	HLA	13000	ND	ND	1800	4200	ND	<640	<1300	<640	ND	<640	<640	<640	ND	
SB9-7 @ 35-37' Tube #9	HLA	30000	ND	ND	2800	6500	ND	2000	<1300	<670	ND	<670	<670	2100	ND	
P9-OS-349 @ 5'	HLA	<20	ND	ND	<5	<5	ND	<5	<11	<5	ND	26 °	6 °	<5	ND	

^a HLA = Harding Lawson Associates, 1991a

Metric = Metric Corporation, 1991

B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
Page 2 of 7

Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)													
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE	
Screening Criterion ^b		100 ^d	50,000 ^c					365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
P9-OS-349 @ 10'	HLA	100	ND	ND	<6	<6	ND	<6	<11	<6	ND	18	9	<6	ND	
P9-OS-349 @ 20'	HLA	<20	ND	ND	<5	<5	ND	<5	<11	<5	ND	45 °	<5 °	<5	ND	
P9-OS-349 @ 25'	HLA	100	ND	ND	<5	<5	ND	<5	<11	<5	ND	21	10	<5	ND	
P9-OS-349 @ 30'	HLA	<20	ND	ND	<7	<7	ND	<7	<14	<7	ND	45 °	<7	<7	ND	
P9-OS-349 @ 35'	HLA	<20	ND	ND	<7	<7	ND	<7	<14	<7	ND	39	15	<7	ND	
P9-OS-349 @ 40'	HLA	<20	ND	ND	<5	<5	ND	<5	<10	<5	ND	40	8	<5	ND	
P9-OS-377 @ 5'	HLA	200	ND	ND	<6	<6	ND	<6	34 °	<6	ND	<6	<6	<6	ND	
P9-OS-377 @ 10'	HLA	<20	ND	ND	<6	<6	ND	<6	27 °	<6	ND	<6	<6	<6	ND	
P9-OS-377 @ 15'	HLA	<20	ND	ND	<6	<6	ND	<6	27 °	<6	ND	<6	11	<6	ND	
P9-OS-377 @ 20'	HLA	<20	ND	ND	<7	<7	ND	<7	37 °	<7	ND	<7	7	<7	ND	
P9-OS-377 @ 25'	HLA	<20	ND	ND	<6	<6	ND	<6	<12	<6	ND	46	36	<6	ND	
P9-OS-377 @ 30'	HLA	<20	ND	ND	<7	<7	ND	<7	<13	<7	ND	69	23	<7	ND	
Pit 1 @ 2.8-3.0'	Metric	25000	NA	NA	NA	NA	ND	3200	NA	ND	ND	NA	ND	ND	ND	
Pit 1 @ 9.2-9.4'	Metric	39000	NA	NA	NA	NA	ND	19000	NA	ND	ND	NA	ND	ND	260	
Pit 1 @ 13.5-13.7'	Metric	55000	NA	NA	NA	NA	590	18000	NA	ND	200	NA	ND	ND	330	

^a HLA = Harding Lawson Associates, 1991a

Metric = Metric Corporation, 1991

B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern^c Total BTEX^d NMOC has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits

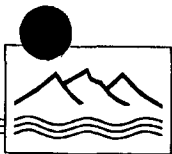


Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
Page 3 of 7

Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)												
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE
Screening Criterion ^b		100 ^d	50,000 ^c				365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
Pit 1 @ 18.8-19.0'	Metric	20000	NA	NA	NA	NA	ND	330	NA	ND	ND	NA	ND	ND	870
Pit 1 @ 26.8-27.0'	Metric	11000	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	160
Pit 1 @ 30.6-30.8'	Metric	16	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 1 @ 41.6-41.8'	Metric	16	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 1 @ 43.5-43.7'	Metric	56	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 #1 @ 18.7-18.9'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 #2 @ 18.7-18.9'	Metric	13000	NA	NA	NA	NA	ND	370	NA	ND	ND	NA	ND	ND	650
Pit 2 @ 26.0-26.2'	Metric	170	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 @ 29.1-29.3'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 @ 39.8-39.9'	Metric	2600	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 @ 44.1-44.3'	Metric	44	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 @ 57.5-57.8'	Metric	250	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 2 @ 69.9-70.1'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 3 BH-1 @ 30.7-30.9'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
Pit 3 BH-2 @ 25.0-25.2'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND

^a HLA = Harding Lawson Associates, 1991a
Metric = Metric Corporation, 1991
B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



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Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
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Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)													
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE	
Screening Criterion ^b		100 ^d	50,000 ^c					365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
SG 86 @ 13.5-13.7'	Metric	18000	NA	NA	NA	NA	ND	240	NA	ND	ND	NA	ND	ND	1900	
SG 86 @ 18.7-18.9'	Metric	5200	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	230	
SG 86 @ 24.9-25.1'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 86 @ 35.0-35.2'	Metric	8.0	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 86 @ 40.5-40.7'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 91 @ 28.6-28.8'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 0.0-1.8'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 2.9-4.6'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 9.0-10.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 14.0-14.8'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 20.3-21.3'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 5.3-26.3'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 349 @ 29.7-30.4'	Metric	8.0	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 360 @ 0.0-2.5'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	
SG 360 @ 4.0-5.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	

^a HLA = Harding Lawson Associates, 1991a

Metric = Metric Corporation, 1991

B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
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Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)													
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE	
Screening Criterion ^b		100 ^d	50,000 ^c					365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
SG 360 @ 9.0-9.9'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 360 @ 14.0-14.7'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 360 @ 19.0-20.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 360 @ 24.0-25.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 360 @ 29.0-29.4'	Metric	2.0	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 0.0-2.5'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 4.0-5.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 9.0-10.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 16.0-16.4'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 19.5-19.8'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 24.0-25.0'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
SG 361 @ 38.0-39.3'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
OS BH-1 @ 18.9-19.1'	Metric	12	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
OS BH-1 @ 34.3-34.5'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND
OS BH-2 @ 9.9-10.1'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND	ND

^a HLA = Harding Lawson Associates, 1991a
Metric = Metric Corporation, 1991
B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
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Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)												
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE
Screening Criterion ^b		100 ^d	50,000 ^c				365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
OS BH-2 @ 22.5-22.6'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-2 @ 31.1-31.3'	Metric	68	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-2 @ 41.8-42.0'	Metric	24	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-2 @ 55.2-55.4'	Metric	16	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-2 @ 69.0-69.2'	Metric	16	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-3 @ 21.0-21.2'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-3 @ 44.1-44.3'	Metric	16	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-3 @ 54.8-55.0'	Metric	16	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-4 @ 27.5-27.7'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-5 @ 14.0-14.2'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-5 @ 19.6-19.9'	Metric	16	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-5 @ 23.4-23.6'	Metric	12	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-6 @ 13.6-13.8'	Metric	12	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-6 @ 47.0-47.2'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-6 @ 52.6-52.8'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND

^a HLA = Harding Lawson Associates, 1991a
Metric = Metric Corporation, 1991
B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



Table 3-3. Organic Compounds Detected in Soil Samples (Pre-1994)
Roswell Compressor Station No. 9
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Sample ID	Source ^a	TPH (mg/kg)	Concentration (µg/kg)												
			Benzene	Toluene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1,1-TCA	Acetone	Chloro- benzene	Chloro- form	Freon- 113	Methylene chloride	PCA	PCE
Screening Criterion ^b		100 ^d	50,000 ^c				365,000	20,000	385,000	10,000	10,000	NS	500	3,280	500
OS BH-6 @ 70.0-71.0'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-7 @ 22.1-22.3'	Metric	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-7 @ 33.5-33.7'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-7 @ 37.0-37.2'	Metric	12	ND	ND	190	440	ND	ND	NA	ND	ND	NA	ND	ND	170
OS BH-8 @ 4.6-4.9'	Metric	12	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-8 @ 33.9-34.1'	Metric	ND	NA	NA	NA	NA	ND	ND	NA	120	ND	NA	ND	ND	160
OS BH-8 @ 49.7-49.9'	Metric	12	ND	ND	140	300	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-9 @ 4.5-4.9'	Metric	8	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-9 @ 32.0-32.5'	Metric	150	NA	NA	NA	NA	ND	ND	NA	ND	ND	NA	ND	ND	ND
OS BH-9 @ 49.5-49.7'	Metric	8	ND	ND	ND	ND	ND	ND	NA	ND	ND	NA	ND	ND	ND
BH-10 @ 37.3-37.6'	Metric	ND	ND	ND	ND	ND	NA	NA	NA	ND	NA	NA	NA	NA	NA
BH-11 @ 36.3-36.7'	Metric	8	ND	ND	ND	ND	NA	NA	NA	ND	NA	NA	NA	NA	NA
SB-1C @ 25-26'	B&R	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB-5 @ 19-21'	B&R	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SB-5 @ 64-66'	B&R	<20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

^a HLA = Harding Lawson Associates, 1991a

Metric = Metric Corporation, 1991

B&R = Brown and Root Environmental, 1993

^b Screening criteria based on performance standard proposed by Transwestern

^c Total BTEX

^d NMOCD has established TPH standards of 100, 1,000, and 5,000 mg/kg for soils depending on potential impacts to public health

^e Compound was also detected in the QC blanks.

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NS = No standard established

NA = Not analyzed

ND = Not detected

Bold values highlight concentrations above reporting limits



Table 3-4. Inorganic Constituents Detected in TCLP Extracts from Soil Samples (Pre-1995)
Roswell Compressor Station No. 9
Page 1 of 2

Sample ID	Source ^a	Concentration (mg/L)							
		Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
TCLP Limit		5.0	100.0	1.0	5.0	5.0	0.2	1.0	5.0
SB9-6 @ 8-11'	HLA	0.004	0.63	0.0010	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 18-20'	HLA	<0.003	1.21	<0.0005	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 20-23'	HLA	<0.003	0.7	<0.0005	0.011	<0.002	<0.0002	<0.003	0.0026
SB9-6 @ 26-28'	HLA	<0.003	1.22	0.0006	0.006	0.008	<0.0002	<0.003	<0.0005
SB9-6 @ 26-28' Tube #5	HLA	<0.003	1.3	0.0012	0.007	0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 26-28' Tube #6	HLA	0.009	0.010	0.0008	0.011	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 9-12'	HLA	<0.003	0.75	0.0005	0.007	0.003	<0.0002	<0.003	<0.0005
SB9-7 @ 21.5-24'	HLA	0.004	2.22	0.0010	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 25.5-28'	HLA	<0.003	1.81	<0.0005	0.009	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 29-32'	HLA	0.008	3.59	0.0011	0.009	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 29-32' Tube #7	HLA	0.008	1.81	0.0012	0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37'	HLA	0.008	1.72	0.0007	0.007	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37' Tube #8	HLA	0.005	1.84	0.0006	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37' Tube #9	HLA	0.004	3.12	0.0006	0.01	<0.002	<0.0002	<0.003	<0.0005
P9-OS-349 @ 5'	HLA	0.007	1.21	0.0009	0.012	0.012	<0.0002	<0.003	<0.0006
P9-OS-349 @ 10'	HLA	0.005	0.4	<0.0006	0.013	0.011	<0.0002	<0.01	<0.0006
P9-OS-349 @ 20'	HLA	<0.003	0.77	<0.0006	0.009	0.004	<0.0002	<0.003	<0.0006

^a HLA = Harding Lawson Associates (1991a)



Table 3-4. Inorganic Constituents Detected in TCLP Extracts from Soil Samples (Pre-1995)
Roswell Compressor Station No. 9
Page 2 of 2

Sample ID	Source ^a	Concentration (mg/L)							
		Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
<i>TCLP Limit</i>		<i>5.0</i>	<i>100.0</i>	<i>1.0</i>	<i>5.0</i>	<i>5.0</i>	<i>0.2</i>	<i>1.0</i>	<i>5.0</i>
P9-OS-349 @ 30'	HLA	<0.003	1.48	<0.0006	0.009	0.007	<0.0002	<0.003	<0.0006
P9-OS-349 @ 35'	HLA	<0.003	1.36	<0.0006	0.011	0.005	<0.0002	<0.003	<0.0006
P9-OS-349 @ 40'	HLA	0.005	0.23	0.0013	<0.007	<0.002	<0.0002	<0.003	<0.0006
P9-OS-377 @ 5'	HLA	0.004	1.05	<0.0006	0.009	0.003	<0.0002	<0.003	<0.0006
P9-OS-377 @ 10'	HLA	0.01	0.19	0.0018	0.007	0.004	<0.0002	<0.01	<0.0006
P9-OS-377 @ 15'	HLA	<0.003	0.15	0.003	0.011	0.009	<0.0002	<0.003	<0.0006
P9-OS-377 @ 20'	HLA	0.003	0.16	0.0010	0.011	0.003	<0.0002	<0.01	<0.0006
P9-OS-377 @ 25'	HLA	0.006	0.06	0.0009	<0.007	<0.002	<0.0002	<0.02	<0.0006
P9-OS-377 @ 30'	HLA	0.011	0.32	<0.0006	<0.007	<0.002	<0.0002	<0.003	<0.0006

^a HLA = Harding Lawson Associates, 1991a



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**Table 3-5. Volatile Organic Compounds Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 1 of 3**

Sample ID	TPH (mg/kg)	Concentration (µg/kg)												
		Benzene	Toulene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1-DCE	1,1,1-TCA	2-Hexanone	Acetone	Carbon Disulfide	Methylene Chloride	PCE	Vinyl Acetate
Screening criterion ^a	100/1,000/ 5,000	50,000 ^b				1,020,000	700	20,000	NS	1,020,000	385,000	500	500	365,000
Pit 1, NW Boring	4,700	210	500	40	270	1,000	40	1,900	<20	1,400	<20	<20	<20	200
Pit 1, SE Boring	26,000	850	9,100	370	2,400	1,200	40	16,000	460	<500	60	160	40	7,000
Pit 2, NE Boring	5,300	140	1,900	900	16,000	<20	<20	<20	<20	<500	<20	<20	<20	<6,000
Pit 2, SW Boring	<50	<5	<5	<5	<5	<5	<5	17	<5	<100	<5	<5	9	<50
MW-7ABD @ 5-10'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-7ABD @ 40-42'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-7ABD @ 60-62'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-7 @ 10-12'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	6 B	<5	<50
MW-7 @ 30-32'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	7 B	<5	<50
MW-7 @ 40-42'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	8 B	<5	<50
MW-7 @ 50-52'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	8 B	<5	<50
MW-7 @ 70-72'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	9 B	<5	<50
MW-8 @ 10'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-8 @ 65'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-9 @ 10'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-9 @ 40-42'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	<5	<5	<50
MW-9 @ 60-62'	NA	<5	<5	<5	<5	<5	<5	<5	<5	<100	<5	10 B	<5	<50
SVE-1 @ 5'	58	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	6	<5	<50

^a Screening criteria based on performance standard proposed by Transwestern

^b Total BTEX

Bold values highlight concentrations above reporting limits

1,1-DCA = 1,1-Dichloroethane
1,1-DCE = 1,1-Dichloroethylene
PCE = Tetrachloroethene
1,1,1-TCA = 1,1,1-Trichloroethane

NS = No standard established

B = Analyte detected in method blank

NA = Not analyzed



**Table 3-5. Volatile Organic Compounds Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 2 of 3**

Sample ID	TPH (mg/kg)	Concentration (µg/kg)												
		Benzene	Toulene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1-DCE	1,1,1-TCA	2-Hexanone	Acetone	Carbon Disulfide	Methylene Chloride	PCE	Vinyl Acetate
<i>Screening criterion^a</i>	<i>100/1,000/ 5,000</i>	<i>50,000^b</i>				<i>1,020,000</i>	<i>700</i>	<i>20,000</i>	<i>NS</i>	<i>1,020,000</i>	<i>385,000</i>	<i>500</i>	<i>500</i>	<i>365,000</i>
SVE-1 @ 60'	28	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	6	<5	<50
SVE-2 @ 30'	3,700	54	86	11	150	73	<5	21	<50	1,500	<5	9	14	<50
SVE-2 @ 60'	56	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
SVE-3 @ 35'	21	2	<5	<5	<5	15	<5	<5	<50	<100	<5	<5	<5	<50
SVE-3 @ 55'	24	68	<5	<5	6	<5	<5	<5	<50	<100	<5	<5	<5	<50
SG86-1 @ 15'	16,000	12	140	18	190	8	<5	89	<50	620	<5	<5	750	<50
SG86-1 @ 30'	74	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
SG86-2 @ 5'	160	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
SG86-2 @ 30'	54	<1	<5	<5	<5	<5	<5	<5	<50	230	<5	<5	<5	<50
SG86-3 @ 25'	27	<1	<5	<5	<5	<5	<5	<5	<50	1,100	<5	6	<5	<50
SG86-3 @ 31'	28	<1	<5	<5	<5	<5	<5	<5	<50	1,000	<5	5	<5	<50
SG86-4 @ 30'	65	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
MW-13 @ 15'	17,000	22	180	20	200	16	<5	120	<50	330	<5	<5	130	<50
MW-13 @ 60'	42	13	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
Pit3-1 @ 30'	36	4	<5	<5	12	<5	<5	<5	<50	<100	<5	5	<5	<50
Pit3-2 @ 5'	89	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
Pit3-2 @ 30'	200	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
Pit3-3 @ 30'	27	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	8	<5	<50

^a Screening criteria based on performance standard proposed by Transwestern

^b Total BTEX

Bold values highlight concentrations above reporting limits

1,1-DCA = 1,1-Dichloroethane
1,1-DCE = 1,1-Dichloroethylene
PCE = Tetrachloroethene
1,1,1-TCA = 1,1,1-Trichloroethane

NS = No standard established

B = Analyte detected in method blank

NA = Not analyzed



**Table 3-5. Volatile Organic Compounds Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 3 of 3**

Sample ID	TPH (mg/kg)	Concentration (µg/kg)												
		Benzene	Toulene	Ethyl- benzene	Total Xylenes	1,1-DCA	1,1-DCE	1,1,1-TCA	2-Hexanone	Acetone	Carbon Disulfide	Methylene Chloride	PCE	Vinyl Acetate
<i>Screening criterion ^a</i>	<i>100/1,000/ 5,000</i>	<i>50,000 ^b</i>				<i>1,020,000</i>	<i>700</i>	<i>20,000</i>	<i>NS</i>	<i>1,020,000</i>	<i>385,000</i>	<i>500</i>	<i>500</i>	<i>365,000</i>
Pit3-4 @ 5'	31	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	6	<5	<50
Pit3-4 @ 30'	43	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	8	<5	<50
Pit3-5 @ 30'	88	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	7	<5	<50
MW-10 @ 60'	84	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-10 @ 65'	NA	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
MW-11 @ 60'	<10	<1	<5	<5	<5	<5	<5	<5	<50	<100	<5	<5	<5	<50
MW-12 @ 50'	46	8	<5	<5	<5	<5	<5	<5	<50	<100	<100	<5	<5	<50
MW-14 @ 60'	80	<1	<5	<5	<5	<5	<5	<5	<50	<100	<100	<5	<5	<50
MW-15 @ 50'	34	<1	<5	<5	<5	<5	<5	<5	<50	<100	<100	8	<5	<50
MW-16 @ 60'	7,200	3,000	68,000	17,000	140,000	<6,000	<6,000	<6,000	<62,000	<125,000	<125,000	<6,000	<6,000	<62,000
MW-17 @ 40'	28	<1	<5	<5	<5	<5	<5	<5	<50	<100	<100	6	<5	<50
MW-18 @ 60'	57	<1	<5	<5	<5	<5	<5	<5	<50	<100	<100	<5	<5	<50
MW-19 @ 60'	54	<1	<5	<5	<5	<5	<5	<5	<50	<100	<100	<5	<5	<50

^a Screening criteria based on performance standard proposed by Transwestern

^b Total BTEX

Bold values highlight concentrations above reporting limits

1,1-DCA = 1,1-Dichloroethane

1,1-DCE = 1,1-Dichloroethylene

PCE = Tetrachloroethene

1,1,1-TCA = 1,1,1-Trichloroethane

NS = No standard established

B = Analyte detected in method blank

NA = Not analyzed



**Table 3-6. Semivolatile Organic Compounds and Polychlorinated Biphenyls Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 1 of 3**

Sample ID	Concentration (µg/kg)										
	Benzo(j) fluoranthene	Bis(2-ethyl hexyl)phthalate	Chrysene	Di-n-butyl phthalate	Fluoranthene	2-Methyl Naphthalene	Naphthalene	Phenanthrene	Phenol (carbolic acid)	Pyrene	PCB 1254
Screening criterion ^a	NS	608	1,000	NS	146,000	NS	30,000	NS	2,190,000	110,000	50
Pit 1, NW Boring	<3,300	4,800	<3,300	<3,300	<3,300	4,800	<3,300	5,600	30,000	<3,300	<1,700
Pit 1, SE Boring	<3,300	<3,300	<3,300	<3,300	<3,300	<3,300	<3,300	5,000	200,000	<3,300	<1,700
Pit 2, NE Boring	<330	<330	<330	<330	<330	460	<330	<330	<330	<330	<1,700
Pit 2, SW Boring	330	<330	330	<330	760	<330	<330	450	<330	890	<17
SVE-1 @ 5'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
SVE-1 @ 60'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
SVE-2 @ 30'	NA	<1,600	<1,600	<1,600	<1,600	<1,600	<1,600	<1,600	<1,600	<1,600	<17
SVE-2 @ 60'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	320
SVE-3 @ 35'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
SVE-3 @ 55'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
SG86-1 @ 15'	NA	<3,300	<3,300	<3,300 B	<3,300	<3,300	<3,300	<3,300	<3,300	<3,300	<17
SG86-1 @ 30'	NA	<330	<330	410 B	<330	<330	<330	<330	<330	<330	<17
SG86-2 @ 5'	NA	<330	<330	820 B	<330	<330	<330	<330	<330	<330	<17
SG86-2 @ 30'	NA	<330	<330	710 B	<330	<330	<330	<330	<330	<330	<17
SG86-3 @ 25'	NA	<330	<330	1,000	<330	<330	<330	<330	<330	<330	<17

^a Screening criteria based on performance standard proposed by Transwestern

PCB 1254 = Polychlorinated biphenyl, Aroclor 1254
B = Analyte detected in method blank

NS = No standard established
NA = Not analyzed

Bold values highlight concentrations above reporting limits



**Table 3-6. Semivolatile Organic Compounds and Polychlorinated Biphenyls Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 2 of 3**

Sample ID	Concentration (µg/kg)										
	Benzo(j) fluoranthene	Bis(2-ethyl hexyl)phthalate	Chrysene	Di-n-butyl phthalate	Fluoranthene	2-Methyl Naphthalene	Naphthalene	Phenanthrene	Phenol (carbolic acid)	Pyrene	PCB 1254
<i>Screening criterion^a</i>	<i>NS</i>	<i>608</i>	<i>1,000</i>	<i>NS</i>	<i>146,000</i>	<i>NS</i>	<i>30,000</i>	<i>NS</i>	<i>2,190,000</i>	<i>110,000</i>	<i>50</i>
SG86-3 @ 31'	NA	<330	<330	330	<330	<330	<330	<330	<330	<330	<17
SG86-4 @ 30'	NA	<330	<330	1,300 B	<330	<330	<330	<330	<330	<330	<17
MW-13 @ 15'	NA	<3300	<3,300	<3300	<3,300	<3300	<3300	<3,300	<3,300	<3,300	<17
MW-13 @ 60'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
Pit 3-1 @ 30'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
Pit 3-2 @ 5'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	30
Pit 3-2 @ 30'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	41
Pit 3-3 @ 30'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
Pit 3-4 @ 5'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
Pit 3-4 @ 30'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
Pit 3-5 @ 30'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	26
MW-10 @ 60'	NA	<330	<330	1,200	<330	<330	<330	<1,650	<330	<330	<17
MW-10 @ 65'	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-11 @ 60'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
MW-12 @ 50'	NA	<330	<330	1,400	<330	<330	<330	<330	<330	<330	<17

^a Screening criteria based on performance standard proposed by Transwestern

PCB 1254 = Polychlorinated biphenyl, Aroclor 1254
B = Analyte detected in method blank

NS = No standard established
NA = Not analyzed

Bold values highlight concentrations above reporting limits



**Table 3-6. Semivolatile Organic Compounds and Polychlorinated Biphenyls Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Concentration (µg/kg)										
	Benzo(j) fluoranthene	Bis(2-ethyl hexyl)phthalate	Chrysene	Di-n-butyl phthalate	Fluoranthene	2-Methyl Naphthalene	Naphthalene	Phenanthrene	Phenol (carbolic acid)	Pyrene	PCB 1254
Screening criterion ^a	NS	608	1,000	NS	146,000	NS	30,000	NS	2,190,000	110,000	50
MW-14 @ 60'	NA	<330	<330	1,200	<330	<330	<330	<330	<330	<330	<17
MW-15 @ 50'	NA	<330	<330	<330	<330	<330	<330	<330	<330	<330	<17
MW-16 @ 60'	NA	<330	<330	<330	<330	1,700	920	<330	<330	<330	21
MW-17 @ 40'	NA	<330	<330	710	<330	<330	<330	<330	<330	<330	<17
MW-18 @ 60'	NA	<330	<330	1,500 B	<330	<330	<330	<330	<330	<330	<17
MW-19 @ 60'	NA	<330	<330	2,200 B	<330	<330	<330	<330	<330	<330	<17

^a Screening criteria based on performance standard proposed by Transwestern

PCB 1254 = Polychlorinated biphenyl, Aroclor 1254
B = Analyte detected in method blank

NS = No standard established
NA = Not analyzed

Bold values highlight concentrations above reporting limits



**Table 3-7. Inorganic Constituents Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
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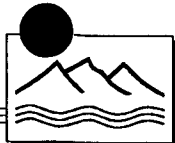
Sample ID	Concentration (mg/kg)																	
	Aluminum (Al)	Antimony (Sb)	Arsenic (As)	Barium (Ba)	Beryllium (Be)	Cadmium (Cd)	Chromium (Cr)	Copper (Cu)	Lead (Pb)	Mercury (Hg)	Nickel (Ni)	Selenium (Se)	Silver (Ag)	Tin (Sn)	Vanadium (V)	Zinc (Zn)	Total Cyanide	Total Sulfide
Screening Criterion ^a	3,700	0.6	5	200	0.4	0.5	10	150	1.5	0.2	10	5	18.3	2,200	26.0	42,000	20	NS
Pit 1 @ NW Boring	5,950	10	9	415	<0.5	<0.5	9	144	<5	0.59	9	<10	<1	<5	14	97	1.1	1,800
Pit 1 @ SE Boring	1,690	<10	17	171	<0.5	<0.5	9	337	11	1.36	5	<10	<1	6	10	282	1.4	940
Pit 2 @ NE Boring	1,430	<10	6	233	0.5	<0.5	8	56	<5	<0.10	5	<10	<1	5	21	45	<0.4	530
Pit 2 @ SW Boring	1,630	<10	<5	734	<0.5	<0.5	7	18	<5	<0.10	<4	10	<1	<5	11	34	<0.4	370
MW-7ABD @ 5-10'	NA	NA	<5	319	NA	NA	7	NA	<5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7ABD @ 40-42'	NA	NA	8	210	NA	NA	16	NA	18	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7ABD @ 60-62'	NA	NA	5	165	NA	NA	14	NA	8	0.42	NA	NA	NA	NA	NA	NA	NA	NA
MW-7 @ 10-12'	NA	NA	<5	301	NA	NA	6	NA	<5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7 @ 30-32'	NA	NA	<5	48	NA	NA	11	NA	6	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7 @ 40-42'	NA	NA	<5	30	NA	NA	9	NA	5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7 @ 50-52'	NA	NA	7	157	NA	NA	19	NA	6	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-7 @ 70-72'	NA	NA	12	102	NA	NA	16	NA	11	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-8 @ 10'	NA	NA	<5	95	NA	NA	8	NA	<5	0.12	NA	NA	NA	NA	NA	NA	NA	NA
MW-8 @ 65'	NA	NA	<5	8	NA	NA	5	NA	<5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-9 @ 10'	NA	NA	8	151	NA	NA	7	NA	<5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-9 @ 40-42'	NA	NA	12	176	NA	NA	13	NA	5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
MW-9 @ 60-62'	NA	NA	14	76	NA	NA	15	NA	5	<0.10	NA	NA	NA	NA	NA	NA	NA	NA
SVE-1 @ 5'	NA	NA	<5	284	NA	<0.5	4	4	<5	<0.10	NA	<10	<1	NA	NA	16	NA	NA

^a Screening criteria based on performance standard proposed by Transwestern

Bold values highlight concentrations above reporting limit.

NS = No standard established

NA = Not analyzed



**Table 3-7. Inorganic Constituents Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 2 of 3**

Sample ID	Concentration (mg/kg)																	
	Aluminum (Al)	Antimony (Sb)	Arsenic (As)	Barium (Ba)	Beryllium (Be)	Cadmium (Cd)	Chromium (Cr)	Copper (Cu)	Lead (Pb)	Mercury (Hg)	Nickel (Ni)	Selenium (Se)	Silver (Ag)	Tin (Sn)	Vanadium (V)	Zinc (Zn)	Total Cyanide	Total Sulfide
Screening Criterion^a	3,700	0.6	5	200	0.4	0.5	10	150	1.5	0.2	10	5	18.3	2,200	26.0	42,000	20	NS
SVE-1 @ 60'	NA	NA	6	197	NA	0.6	28	17	11	0.13	NA	<10	<1	NA	NA	58	NA	NA
SVE-2 @ 30'	NA	NA	5	250	NA	<0.5	9	10	7	<0.10	NA	<10	<1	NA	NA	34	NA	NA
SVE-2 @ 60'	NA	NA	6	203	NA	0.6	19	16	11	<0.10	NA	<10	<1	NA	NA	51	NA	NA
SVE-3 @ 35'	NA	NA	<5	185	NA	<0.5	7	7	5	<0.10	NA	<10	<1	NA	NA	25	NA	NA
SVE-3 @ 55'	NA	NA	6	216	NA	<0.5	12	12	10	<0.10	NA	<10	<1	NA	NA	46	NA	NA
SG86-1 @ 15'	NA	NA	13	113	NA	<0.5	8	NA	10	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
SG86-1 @ 30'	NA	NA	6	550	NA	<0.5	8	NA	<5	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
SG86-2 @ 5'	NA	NA	6	387	NA	<0.5	3	NA	<5	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
SG86-2 @ 30'	NA	NA	6	871	NA	<0.5	17	NA	<5	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
SG86-3 @ 25'	NA	NA	6	311	NA	<0.5	4	5	<5	<0.10	NA	<10	<1	NA	NA	18	NA	NA
SG86-3 @ 31'	NA	NA	6	680	NA	<0.5	5	6	<5	<0.10	NA	<10	<1	NA	NA	17	NA	NA
SG86-4 @ 30'	NA	NA	5	501	NA	<0.5	11	NA	<5	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
Pit 3-1 @ 30'	NA	NA	<5	116	NA	0.5	15	11	11	<0.10	NA	<10	<1	NA	NA	41	NA	NA
Pit 3-2 @ 5'	NA	NA	<5	209	NA	<0.5	2	12	<5	<0.10	NA	<10	<1	NA	NA	6	NA	NA
Pit 3-2 @ 30'	NA	NA	<5	17	NA	<0.5	2	3	<5	<0.10	NA	<10	<1	NA	NA	8	NA	NA
Pit 3-3 @ 30'	NA	NA	6	60	NA	0.5	17	12	11	<0.10	NA	<10	<1	NA	NA	47	NA	NA
Pit 3-4 @ 5'	NA	NA	5	589	NA	<0.5	3	3	<5	<0.10	NA	<10	<1	NA	NA	12	NA	NA
Pit 3-4 @ 30'	NA	NA	<5	50	NA	<0.5	10	10	10	<0.10	NA	<10	<1	NA	NA	34	NA	NA

^a Screening criteria based on performance standard proposed by Transwestern

Bold values highlight concentrations above reporting limit.

NS = No standard established

NA = Not analyzed



**Table 3-7. Inorganic Constituents Detected in Phase I and II Soil Samples
Roswell Compressor Station No. 9
Page 3 of 3**

Sample ID	Concentration (mg/kg)																	
	Aluminum (Al)	Antimony (Sb)	Arsenic (As)	Barium (Ba)	Beryllium (Be)	Cadmium (Cd)	Chromium (Cr)	Copper (Cu)	Lead (Pb)	Mercury (Hg)	Nickel (Ni)	Selenium (Se)	Silver (Ag)	Tin (Sn)	Vanadium (V)	Zinc (Zn)	Total Cyanide	Total Sulfide
Screening Criterion^a	3,700	0.6	5	200	0.4	0.5	10	150	1.5	0.2	10	5	18.3	2,200	26.0	42,000	20	NS
Pit 3-5 @ 30'	NA	NA	6	279	NA	<0.5	10	6	7	<0.10	NA	<10	<1	NA	NA	17	NA	NA
MW-10 @ 60'	NA	NA	<5	85	NA	<0.5	5	4	<5	<0.10	NA	<10	<1	NA	NA	18	NA	NA
MW-10 @ 65'	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-11 @ 60'	NA	NA	6	59	NA	0.5	14	14	16	<0.10	NA	<10	<1	NA	NA	50	NA	NA
MW-12 @ 50'	NA	NA	<5	111	NA	<0.5	5	4	<5	<0.10	NA	<10	<1	NA	NA	19	NA	NA
MW-13 @ 15'	NA	NA	9	230	NA	<0.5	7	8	14	<0.10	NA	<10	<1	NA	NA	33	NA	NA
MW-13 @ 60'	NA	NA	<5	159	NA	<0.5	8	7	6	<0.10	NA	<10	<1	NA	NA	25	NA	NA
MW-14 @ 60'	NA	NA	<5	120	NA	<0.5	5	5	5	<0.10	NA	<10	<1	NA	NA	21	NA	NA
MW-15 @ 50'	NA	NA	<5	96	NA	<0.5	7	4	5	<0.10	NA	<10	<1	NA	NA	22	NA	NA
MW-16 @ 60'	NA	NA	<5	87	NA	<0.5	3	3	<5	<0.10	NA	<10	<1	NA	NA	13	NA	NA
MW-17 @ 40'	NA	NA	<5	168	NA	<0.5	7	5	5	<0.10	NA	<10	<1	NA	NA	21	NA	NA
MW-18 @ 60'	NA	NA	8	91	NA	<0.5	27	NA	7	<0.10	NA	<10	<1	NA	NA	NA	NA	NA
MW-19 @ 60'	NA	NA	<5	29	NA	<0.5	3	5	<5	<0.10	NA	<10	4	NA	NA	6	NA	NA

^a Screening criteria based on performance standard proposed by Transwestern

Bold values highlight concentrations above reporting limit.

NS = No standard established

NA = Not analyzed



**Table 3-8. Depth to Water and Ground-Water Elevations for Existing Monitor Wells
Roswell Compressor Station No. 9**

Monitor Well	Measuring Point Elevation (fmsl)	Date Measured	Depth to Water (ft)	PSH Thickness (ft)	Ground-Water Elevation ^a (fmsl)
MW-1	NA	09/23/96	45.08	7.50	NA
MW-1B	3609.96	09/23/96	63.00	3.90	3549.92
MW-2	3611.76	09/23/96	61.85	2.85	3552.08
		09/27/96	62.00	2.33	3551.53
MW-3	3614.87	04/30/93	64.66	0.00	3550.21
		12/04/94	64.60	0.00	3550.27
		09/15/95	64.58	0.00	3550.29
		09/27/96	64.79	0.00	3550.08
MW-5	3612.77	04/30/93	63.14	0.00	3549.63
		12/04/94	62.55	0.00	3550.22
		09/15/95	62.46	0.00	3550.31
		09/27/96	62.32	0.00	3550.45
MW-6	3618.62	12/04/96	65.50	0.00	3553.12
		09/15/95	61.52	0.00	3557.10
		09/27/96	61.85	0.00	3556.77
MW-7	3599.20	09/15/95	55.60	0.00	3543.60
		09/27/96	54.74	0.00	3544.46
MW-8	3595.80	09/15/95	52.82	0.00	3542.98
		09/27/96	51.98	0.00	3543.82
MW-9	3599.35	09/15/95	50.48	0.00	3548.87
		09/27/96	50.27	0.00	3549.08
MW-10	3617.85	09/27/96	67.21	0.00	3550.64
MW-11	3613.31	09/27/96	62.90	0.00	3550.41
MW-12	3606.38	09/27/96	55.58	0.00	3550.80
MW-13	3612.46	09/27/96	62.39	0.00	3550.07
MW-14	3604.83	09/27/96	53.38	0.00	3551.45
MW-15	3610.43	09/27/96	58.77	0.00	3551.66
MW-16	3612.41	09/23/96	68.15	5.15	3548.17
		09/27/96	67.16	4.01	3548.30
MW-17	3608.48	09/27/96	59.30	0.00	3549.18
MW-18	3609.73	09/27/96	Dry	Dry	Dry
MW-19	3608.17	09/27/96	57.95	0.00	3550.22

fmsl = Feet above mean sea level
 PSH = Phase-separated hydrocarbons
 NA = Not available^a

Ground-water elevations are corrected by the following equation:
 Ground-water elevation = (Measuring point elevation - (Depth to water - PSH thickness x 0.76))



**Table 3-9. Organic Compounds Detected in Ground-Water Samples
Roswell Compressor Station No. 9
Page 1 of 2**

Monitor Well	Source ^a	Date	Concentration (µg/L)									
			Benzene	Toluene	Ethyl-benzene	Total Xylene	1,1,1-TCA	1,1-DCA	2-Butanone (MEK)	Methyl Methacrylate	4-Methyl-phenol	Total Naphthalene
Screening Criterion ^b			5 ^c	750	750	620	60	NS	NS	NS	NS	30
MW-1	HB	09/21/92	370	61	110	940	180	560	220	NA	250	85
MW-2	B&R	10/09/93	6,500	15,000	2,100	13,000	<300	<300	NA	NA	NA	NA
MW-3	B&R	04/30/93	<5	<5	<5	NA	<5	<5	NA	NA	NA	NA
	DBS&A	08/22/95	<5	<5	<5	<5	<5	<5	<100	<5	<10	<10
		09/10/96	<1	<5	<5	<5	<5	<5	<5	<100	NA	<10
MW-5	B&R	04/30/93	<5	<5	<5	NA	<5	<5	NA	NA	NA	NA
	DBS&A	08/22/95	<5	<5	<5	<5	<5	<5	<100	<5	<10	<10
		09/10/96	<1	<5	<5	<5	<5	<5	<5	<100	NA	<10
MW-6	DBS&A	12/02/94	<0.5	<0.5	<0.5	<0.5	<0.2	<0.2	NA	NA	NA	NA
		08/22/95	<5	<5	<5	<5	<5	<5	<100	<5	<10	<10
		09/10/96	<1	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-7	DBS&A	08/23/95	<5	<5	<5	<5	<5	<5	900	5	<10	<10
		09/17/96	<1	<5	<5	<5	<5	<5	<100	NA	<10	<10

Note: Only constituents detected in one or more ground-water samples are shown in this table.

^a HB = Halliburton NUS Environmental Corporation, 1992
B&R = Brown & Root Environmental, 1993
DBS&A = Daniel B. Stephens & Associates, Inc., 1995 and 1996

^b Screening criteria based on performance standard proposed by Transwestern

^c U.S. EPA maximum contaminant level

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane

B = Analyte present in method blank
NA = Not analyzed
NS = No standard established

Bold values highlight concentrations above reporting limits



**Table 3-9. Organic Compounds Detected in Ground-Water Samples
Roswell Compressor Station No. 9
Page 2 of 2**

Monitor Well	Source ^a	Date	Concentration (µg/L)									
			Benzene	Toluene	Ethyl- benzene	Total Xylene	1,1,1-TCA	1,1-DCA	2-Butanone (MEK)	Methyl Methacrylate	4-Methyl- phenol	Total Naphthalene
Screening Criterion ^b			5 ^c	750	750	620	60	NS	NS	NS	NS	30
MW-8	DBS&A	08/22/95	6	<5	<5	<5	<5	<5	<100	<5	<10	<10
		09/11/96	<1	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-9	DBS&A	08/23/95	<5	<5	<5	<5	<5	<5	<100	<5	<10	<10
		09/11/96	<1	<5	<5	<5	<5	<5	<100	<5	<10	<10
MW-10	DBS&A	09/19/96	2	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-11	DBS&A	09/19/96	<1	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-12	DBS&A	09/17/96	760	<5	<5	52	<5	<5	<100	NA	<10	<10
MW-13	DBS&A	09/19/96	4,600	9	<5	170	<5	<5	<100	NA	<10	<10
MW-14	DBS&A	09/24/96	2 B	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-15	DBS&A	09/25/96	4 B	6	<5	6	<5	<5	<100	NA	<10	<10
MW-17	DBS&A	09/24/96	2 B	<5	<5	<5	<5	<5	<100	NA	<10	<10
MW-19	DBS&A	09/27/96	2	<5	<5	<5	<5	<5	<100	NA	<10	<10

Note: Only constituents detected in one or more ground-water samples are shown in this table.

^a HB = Halliburton NUS Environmental Corporation, 1992
B&R = Brown & Root Environmental, 1993
DBS&A = Daniel B. Stephens & Associates, Inc., 1995 and 1996

^b Screening criteria based on performance standard proposed by Transwestern

^c U.S. EPA maximum contaminant level

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane

B = Analyte present in method blank
NA = Not analyzed
NS = No standard established

Bold values highlight concentrations above reporting limits



**Table 3-10. Selected Metals Detected in Ground-Water Samples
Roswell Compressor Station No. 9
Page 1 of 2**

Monitor Well	Source ^a	Date	Concentration (µg/L)										
			Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver	Aluminum	Copper	Zinc
Screening Criterion ^b			100	1,000	10	50	50	2	50	50	5,000	1,000	10,000
MW-1	HB	09/21/92	190	4,400	<5	10	<50	<0.2	<3	<10	NA	NA	NA
MW-3	CES	03/23/94	<30	90	<10	<10	40	<0.2	<40	<10	NA	NA	NA
		03/23/94 ^b	<30	20	<10	<10	<30	<0.2	<40	<10	NA	NA	NA
	DBS&A	08/22/95	<50	<10	<5	<10	<50	0.2	<100	<10	240	<10	30
		09/10/96	<50	20	<5	<10	<3	<0.2	<10	<10	NA	<10	<10
MW-5	CES	03/23/94	<30	380	<10	30	40	<0.2	<40	<10	NA	NA	NA
		03/23/94 ^b	<30	10	<10	<10	<30	<0.2	<40	<10	NA	NA	NA
	DBS&A	08/22/95	<50	<10	<5	<10	<50	<0.2	<100	<10	380	<10	10
		09/10/96	<50	10	<5	<10	<3	<0.2	20	<10	NA	<10	20
MW-6	DBS&A	08/22/95	<50	<10	<5	<10	<50	0.5	<100	<10	690	<10	30
		09/10/96	<50	10	<5	<10	4	<0.2	<10	<10	NA	<10	<10
MW-7	DBS&A	08/23/95	<50	20	<5	<10	<50	0.4	<100	<10	1,390	<10	20
		09/17/96	<50	20	<5	<10	<3	<0.2	<100	<10	NA	<10	20

Notes: 1. Unless otherwise noted, all analyses represent total metal concentrations.

2. Bold values highlight concentrations above reporting limits.

NA = Not analyzed

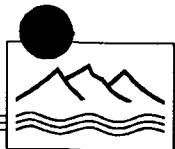
^a HB = Halliburton NUS Environmental Corporation, 1992

CES = Cypress Engineering Services

DBS&A = Daniel B. Stephens & Associates, Inc., 1996

^b Screening criteria based on performance standard proposed by Transwestern

^c Dissolved metal concentrations determined on samples filtered in the laboratory prior to analysis.



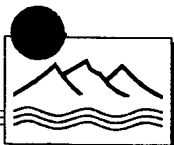
**Table 3-10. Selected Metals Detected in Ground-Water Samples
Roswell Compressor Station No. 9
Page 2 of 2**

Monitor Well	Source ^a	Date	Concentration (µg/L)										
			Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver	Aluminum	Copper	Zinc
Screening Criterion ^b			100	1,000	10	50	50	2	50	50	5,000	1,000	10,000
MW-8	DBS&A	08/22/95	<50	<10	<5	<10	<50	0.3	<100	<10	330	<10	10
		09/11/96	<50	10	<5	<10	<3	<0.2	<10	<10	NA	<10	<10
MW-9	DBS&A	08/23/95	<50	40	<5	<10	<50	0.5	<100	<10	3,130	10	30
		09/11/96	<50	50	<5	10	4	<0.2	<10	<10	NA	<10	20
MW-10	DBS&A	09/19/96	<50	<10	<5	<10	<3	<0.2	<10	<10	NA	<10	20
MW-11	DBS&A	09/19/96	<50	<10	<5	<10	4	<0.2	<10	<10	NA	<10	40
MW-12	DBS&A	09/17/96	<50	20	<5	<10	<3	<0.2	<10	<10	NA	<10	10
MW-13	DBS&A	09/19/96	<50	<10	<5	<10	<3	<0.2	<10	<10	NA	<10	10
MW-14	DBS&A	09/24/96	<50	30	<5	<10	<3	<0.2	<10	<10	NA	<10	10
MW-15	DBS&A	09/25/96	<50	30	<5	<10	<3	<0.2	<10	<10	NA	<10	80
MW-17	DBS&A	09/24/96	<50	<10	<5	<10	<3	<0.2	<10	<10	NA	<10	10
MW-19	DBS&A	09/27/96	<50	10	<5	<10	4	<0.2	<10	<10	NA	<10	40

Notes: 1. Unless otherwise noted, all analyses represent total metal concentrations.
2. Bold values highlight concentrations above reporting limits.
NA = Not analyzed

^a HB = Halliburton NUS Environmental Corporation, 1992
CES = Cypress Engineering Services
DBS&A = Daniel B. Stephens & Associates, Inc., 1996

^b Screening criteria based on performance standard proposed by Transwestern



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**Table 3-11. Major Ions Detected in Ground-Water Samples
Roswell Compressor Station No. 9**

Monitor Well	Date	Concentration (mg/L)								
		Calcium	Chloride	Magnesium	Nitrate/ Nitrite as N	Potassium	Sodium	Sulfate	Total Alkalinity	Total Dissolved Solids
NWMQCC Ground-Water Standard		NS	250	NS	10	NS	NS	600	NS	1,000
MW-3	08/22/95	587	405	136	0.80	3.2	215	1,800	116	3,650
	09/10/96	635	385	144	0.96	20	229	1,800	115	3,530
MW-5	08/22/95	623	574	145	3.10	3.8	204	1,800	122	3,440
	09/10/96	631	578	158	297	19	218	1,690	114	3,550
MW-6	08/22/95	458	344	148	1.00	3.9	124	1,600	110	2,800
	09/10/96	488	333	154	0.98	19	182	1,490	99	3,040
MW-7	08/23/95	668	284	235	0.12	8.2	149	2,000	136	3,640
	09/17/96	648	273	198	0.07	20	145	2,140	110	3,760
MW-8	08/22/95	587	362	193	0.10	3.7	117	2,000	134	3,640
	09/11/96	630	331	222	0.06	21	206	2,120	141	3,780
MW-9	08/23/96	896	391	232	0.38	17	230	2,200	124	4,060
	09/11/96	673	439	210	0.56	24	287	1,990	114	3,810
MW-10	09/19/96	634	367	153	0.75	6	179	3,360	133	3,390
MW-11	09/19/96	642	400	144	0.71	<5	202	2,480	116	3,480
MW-12	09/17/96	688	431	127	0.36	16	247	1,810	110	3,670
MW-13	09/19/96	496	438	123	0.13	5	136	2,910	136	2,810
MW-14	09/24/96	668	364	154	0.31	6	149	2,000	98	3,580
MW-15	09/25/96	1,130	438	180	0.58	7	210	3,940	138	3,860
MW-17	09/24/96	626	437	170	0.71	<5	218	2,000	138	3,660
MW-19	09/27/96	981	459	226	0.82	5	240	2,100	196	3,850

NS = No standard established



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Table 3-12. SVE Pilot Test Soil Gas Analyses

Sample ID	Date	Concentration				
		(mole %)			(ppmv)	
		Oxygen	Nitrogen	Carbon Dioxide	Methane	Non-Methane Hydrocarbon
SVE-3	09/24/96	3.15	80.21	14.60	7,600	12,800
MW-1 SVE/AI	09/24/96	1.46	85.01	12.02	800	14,300

ppmv = Part per million volume

All analyses performed by Core Laboratories, Houston, Texas

**Table 6-1. Analytical Parameters, Methods, and Data Quality Objectives**

Analyte Class	EPA Method ^a	Precision Objective (RPD) ^b	Accuracy Objective (%R) ^c	Completeness Objective (%)
VOCs	8010/8020/8240	20	80–120	90
SVOCs	8100/8270	30	60–140	90
PCBs	8080	30	60–140	90
Appendix IX total metals ^d	6010/7000	20	80–120	90
Total cyanide	9012	20	80–120	90
Total sulfide	9030	20	80–120	90
Total petroleum hydrocarbons	418.1	20	NA	90
Major cations ^e	6010	20	NA	90
Total alkalinity	310.1	20	NA	90
Chloride	9250	20	NA	90
Sulfate	9038	20	NA	90
Nitrate and nitrite	9200	20	NA	90
TDS	160.1	20	NA	90

^a U.S. EPA, 1986^b Relative percent difference between duplicate^c Percent recovery of matrix spike^d Includes Ag, As, Ba, Be, Cd, Co, Cr, Cu, Hg, Ni, Pb, Sb, Se, Sn, Tl, V, Zn^e Includes Ca, K, Mg, Na, Fe, Mn

Note: The proposed analysis for each sample is described in the Phase II work plan.



Table 6-2. Sample Collection Protocol

Analyte	EPA Method ^a	Sample Volume/Container	Sample Preservation	Holding Time
<i>Soil Matrix</i>				
VOCs	8010/8020/ 8240	6" brass ring/250 mL glass jars	Chill to 4°C	14 days
SVOCs	8100/8270	6" brass ring/250 mL glass jars	Chill to 4°C	14/40 days
PCBs	8080	6" brass ring/250 mL glass jars	Chill to 4°C	14/40 days
Appendix IX metals ^b	6010/7000	6" brass ring/250 mL glass jars	Chill to 4°C	6 months
Total cyanide	9010	6" brass ring/250 mL glass jars	Chill to 4°C	14 days
Total sulfide	9030	6" brass ring/250 mL glass jars	Chill to 4°C	7 days
TPH (gasoline)	418.1	6" brass ring/250 mL glass jars	Chill to 4°C	28 days
<i>Ground-Water Matrix</i>				
VOCs	8010/8020 8240	Two 40-mL septum vials	HCl to pH<2; chill to 4°C	14 days
SVOCs	8100/8270	1 L glass	Chill to 4°C	7/40 days
PCBs	8080	1 L glass	Chill to 4°C	7/40 days
Appendix IX metals ^b	6010/7000	1 L glass	Chill to 4°C	6 months
Total cyanide	9010	1 L glass	NaOH to pH>12	14 days
Total sulfide	9030	1 L glass	ZnAc + NaOH to pH>12	7 days
TPH (gasoline)	418.1	Two 40-mL septum vials	HCl to pH<2; chill to 4°C	28 days
Major cations ^c	3010/6010	500-mL plastic	HNO ₃ to pH<2	6 months
Bicarbonate (total)	310.1	500-mL plastic	Chill to 4°C	14 days
Chloride (total)	9250	500-mL plastic	Chill to 4°C	28 days
Nitrate (total)	9200	500-mL plastic	H ₂ SO ₄ to pH<2; chill to 4°C	28 days
Sulfate (total)	9038	500-mL plastic	Chill to 4°C	28 days
TDS	160.1	500-mL plastic	Chill to 4°C	7 days

Note: All laboratory analyses to be performed on unfiltered ground-water samples except for samples with a measured turbidity of 5 NTU or greater, in which case the laboratory will be instructed to filter the sample prior to analysis.

^a U.S. EPA, 1986

^b Includes Ag, As, Ba, Be, Cd, Co, Cr, Cu, Hg, Ni, Pb, Sb, Se, Sn, Ti, V, Zn

^c Includes Ca, K, Mg, Na, Fe, Mn

VOCs = Volatile organic compounds
SVOCs = Semivolatile organic compounds
PCBs = Polychlorinated biphenyls
TPH = Total petroleum hydrocarbons
TDS = Total dissolved solids

Table 7.1: Performance Standards for Soil

		Max. conc. detected in any sample (mg/kg)	Performance Standard (mg/kg)	Source of standard
MAHs	Total BTEX	228	50	NM OCD
	benzene	3.00	0.5	TX RRR
	toluene	68.00	100	TX RRR
	ethyl benzene	17.00	70	TX RRR
	xylene (total)	140.00	1,000	TX RRR
Other VOCs	acetone	1.5	365	TX RRR
	2-butanone (MEK)		183	TX RRR
	carbon disulfide	0.06	365	TX RRR
	carbon tetrachloride		0.5	TX RRR
	chlorobenzene	0.12	10	TX RRR
	chloroethane		73	TX RRR
	chloroform	0.2	10	TX RRR
	1,1-dichloroethane	1.2	365	TX RRR
	1,2-dichloroethane		0.5	TX RRR
	1,1,2-dichloroethane	0.04	0.7	TX RRR
	c-1,2-dichloroethane		7	TX RRR
	t-1,2-dichloroethane		10	TX RRR
	2-hexanone (MNBK)	0.46		(no standard)
	MIBK		183	TX RRR
	methyl methacrylate		292	TX RRR
	methylene chloride	0.16	0.5	TX RRR
	1,1,1,2-tetrachloroethane	2.1	3.28	TX RRR
	1,1,2,2-tetrachloroethane		0.426	TX RRR
	tetrachloroethene	1.9	0.5	TX RRR
	1,1,1-trichloroethane	19	20	TX RRR
	1,1,2-trichloroethane		0.5	TX RRR
	trichloroethene		0.5	TX RRR
	Freon-113	5.1	3,100	EPA Reg. III SSLs
	vinyl acetate	7	365	TX RRR
	vinyl chloride		0.2	TX RRR
PAHs	acenaphthene		219	TX RRR
	benzo(b)fluoranthene		4	EPA Reg. III SSLs
	benzo(k)fluoranthene		4	EPA Reg. III SSLs
	benzo(j)fluoranthene	0.33		(no standard)
	benzo(a)pyrene		4	EPA Reg. III SSLs
	chrysene	0.33	1	EPA Reg. III SSLs
	fluoranthene	0.76	146	TX RRR
	fluorene		146	TX RRR
	1-methylnaphthalene			(no standard)
	2-methylnaphthalene	4.8		(no standard)
	naphthalene	0.92	146	TX RRR
	phenanthrene	5.6		(no standard)
	pyrene	0.89	110	TX RRR
Other SVOCs	bis(2-ethylhexyl)phthalate	4.8	0.608	TX RRR
	di-n-butyl-phthalate	2.2	365	TX RRR
	m-cresol (3-methylphenol)		183	TX RRR
	o-cresol (2-methylphenol)		183	TX RRR
	p-cresol (4-methylphenol)		183	TX RRR
	m-dichlorobenzene (1,3)		60	TX RRR
	o-dichlorobenzene (1,2)		60	TX RRR
	p-dichlorobenzene (1,4)		7.5	TX RRR
	phenol	200	2,190	TX RRR
Other	PCBs	0.32	0.05	TX RRR
	cyanide	1.4	20	TX RRR
	sulfide	1,800		(no standard)
	TPH	55,000	100/1,000/5,000	NM OCD
Metals	aluminum	5,950	3,700	EPA Reg. III (TWx100)
	antimony	10	0.6	TX RRR
	arsenic	17	5	TX RRR
	barium	734	200	TX RRR
	beryllium	0.5	0.4	TX RRR
	cadmium	0.6	0.5	TX RRR
	chromium (total)	28	10	TX RRR
	chromium (VI)		10	TX RRR
	cobalt		220	EPA Reg. III (TWx100)
	copper	337	150	EPA Reg. III (TWx100)
	lead	18	1.5	TX RRR
	mercury	1.36	0.2	TX RRR
	nickel	9	10	TX RRR
	selenium	10	5	TX RRR
	silver	4	18.3	TX RRR
	thallium		0.4	EPA Reg. III SSLs
	tin	6	2,200	EPA Reg. III (TWx100)
	vanadium	21	26.0	EPA Reg. III (TWx100)
	zinc	282	42,000	EPA Reg. III

NM OCD - New Mexico Oil Conservation Division, Guidelines for Remediation of Leaks, Spills, and Releases

TX RRR - Texas Risk Reduction Rules Media Specific Concentrations for Standard No. 2 (GWP-Res.)

EPA Reg. III SSLs - EPA Region III Risk-Based Concentration Table Soil Screening Levels

EPA Reg. III (TWx100) - EPA Region III Risk-Based Concentration Table (Tap Water Standard x 100)

Table 7.2: Performance Standards for Ground Water

		Note (1)	Max. conc. detected in any sample (µg/L)	Performance Standard (µg/L)	Source of standard
MAHs	benzene	x	6,500	5	SDWA MCL
	toluene	x	15,000	750	NMWQCC
	ethyl benzene	x	2,100	700	SDWA MCL
	xylene (total)	x	13,000	620	NMWQCC
Other VOCs	acetone			3,650	TX RRR
	2-butanone (MEK)		900	1,830	TX RRR
	carbon disulfide			3,650	TX RRR
	carbon tetrachloride	x		5	SDWA MCL
	chlorobenzene	x		100	SDWA MCL
	chloroethane	x		730	TX RRR
	chloroform	x		100	NMWQCC
	1,1-dichloroethane	x	560	25	NMWQCC
	1,2-dichloroethane	x		5	SDWA MCL
	1,1-dichloroethene	x		5	NMWQCC
	c-1,2-dichloroethene	x		70	SDWA MCL
	t-1,2-dichloroethene	x		100	SDWA MCL
	2-hexanone (MNBK)				(no standard)
	MIBK			1,830	TX RRR
	methyl methacrylate		5	2,920	TX RRR
	methylene chloride	x		100	NMWQCC
	1,1,1,2-tetrachloroethane	x		32.8	TX RRR
	1,1,2,2-tetrachloroethane	x		10	NMWQCC
	tetrachloroethene	x		5	SDWA MCL
	1,1,1-trichloroethane	x	180	60	NMWQCC
	1,1,2-trichloroethane	x		10	NMWQCC
	trichloroethene	x		5	SDWA MCL
	Freon-113			59,000	EPA Reg. III
	vinyl acetate			36,500	TX RRR
	vinyl chloride	x		1	NMWQCC
PAHs	Total naphthalene plus monomethylnaphthalenes		85	30	NMWQCC
	acenaphthene	x		2,190	TX RRR
	benzo(b)fluoranthene	x		0.092	EPA Reg. III
	benzo(k)fluoranthene	x		0.92	EPA Reg. III
	benzo(j)fluoranthene	x			(no standard)
	benzo(a)pyrene	x		0.7	NMWQCC
	chrysene	x		9.2	EPA Reg. III
	fluoranthene	x		1,460	TX RRR
	fluorene	x		1,460	TX RRR
	1-methylnaphthalene	x			(no standard)
	2-methylnaphthalene	x	51		(no standard)
	naphthalene	x	34	1,460	TX RRR
	phenanthrene	x			(no standard)
	pyrene	x		1100	TX RRR
Other SVOCs	bis(2-ethylhexyl)phthalate	x		6.08	TX RRR
	di-n-butyl-phthalate	x		3,650	TX RRR
	m-cresol (3-methylphenol)			1,830	TX RRR
	o-cresol (2-methylphenol)			1,830	TX RRR
	p-cresol (4-methylphenol)		250	1,830	TX RRR
	m-dichlorobenzene (1,3)	x		600	TX RRR
	o-dichlorobenzene (1,2)	x		600	TX RRR
	p-dichlorobenzene (1,4)	x		75	TX RRR
	phenol	x		5	NMWQCC
Other	PCBs	x		0.5	SDWA MCL
	cyanide			200	NMWQCC
	sulfide		100		(no standard)
	TPH		37		(no standard)
Metals	aluminum		3,130	5,000	NMWQCC
	antimony			6	TX RRR
	arsenic		190	50	SDWA MCL
	barium		4,400	1,000	NMWQCC
	beryllium			4	TX RRR
	cadmium			5	SDWA MCL
	chromium (total)		30	50	NMWQCC
	chromium (VI)			100	TX RRR
	cobalt			50	NMWQCC
	copper		10	1,000	NMWQCC
	lead		40	15	SDWA MCL
	mercury		0.5	2	NMWQCC
	nickel			200	NMWQCC
	selenium		20	50	NMWQCC
	silver			50	NMWQCC
	thallium				(no standard)
	tin			22,000	EPA Reg. III
	vanadium			260	EPA Reg. III
	zinc		80	10,000	NMWQCC

Note (1) - "x" indicates those constituents listed as "toxic pollutants" under NMR Title 20/Chapter 6/Part 2/ Subpart I/1101

SDWA MCL - Federal Safe Drinking Water Act Maximum Contaminant Level

NMWQCC - New Mexico Water Quality Control Commission Ground Water Standards; August 18, 1991

TX RRR - Texas Risk Reduction Rules Media Specific Concentrations for Standard No. 2

EPA Reg. III - EPA Region III Risk-Based Concentration Table

GUIDELINES

FOR

REMEDIATION

OF

LEAKS, SPILLS AND RELEASES

(AUGUST 13, 1993)

New Mexico Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088



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INTRODUCTION

The following document is to be used as a guide on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

****** Note:** Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.

I. NOTIFICATION OF LEAK, SPILL OR RELEASE

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

A. RESPONSIBLE PARTY AND LOCAL CONTACT

The name, address and telephone number of the person/persons in charge of the facility/operation as well as the owner and/or operator of the facility/operation and a local contact.

B. FACILITY

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

C. TIME OF INCIDENT

The date, time and duration of the incident.

D. DISCHARGE EVENT

A description of the source and cause of the incident.

E. TYPE OF DISCHARGE

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

F. QUANTITY

The known or estimated volume of the discharge.

G. SITE CHARACTERISTICS

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

H. IMMEDIATE CORRECTIVE ACTIONS

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

II. INITIAL RESPONSE ACTIONS

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

A. SOURCE ELIMINATION AND SITE SECURITY

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

B. CONTAINMENT

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

C. SITE STABILIZATION

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

III. SITE ASSESSMENT

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

A. GENERAL SITE CHARACTERISTICS

1. Depth To Ground Water

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowermost contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

2. Wellhead Protection Area

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

3. Distance To Nearest Surface Water Body

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

B. SOIL/WASTE CHARACTERISTICS

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

1. Highly Contaminated/Saturated Soils

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA Subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA Subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)

C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

IV. SOIL AND WATER REMEDIATION ACTION LEVELS

A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. Unsaturated Contaminated Soils

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

<u>Depth To Ground Water</u>	<u>Ranking Score</u>
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source, or;	
<200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	<u>Total Ranking Score</u>		
	<u>>19</u>	<u>10 - 19</u>	<u>0 - 9</u>
<u>Benzene(ppm)*</u>	10	10	10
<u>BTEX(ppm)*</u>	50	50	50
<u>TPH(ppm)**</u>	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents may be required based upon the nature of the contaminant which was leaked, spilled or released.

A. HIGHLY CONTAMINATED OR SATURATED SOILS

The following method is used to determine if soils are highly contaminated or saturated:

1. Physical Observations

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

B. UNSATURATED CONTAMINATED SOILS

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

1. Soil Sampling Procedures for Headspace Analysis

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (i.e. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedure! Accepted OCD procedures are as follows:

- a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.
- b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).
- c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.
- d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

2. Soil Sampling Procedures For Laboratory Analysis

a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

- i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.
- ii) Label the samples with a unique code for each sample.
- iii) Cool and store samples with cold packs or on ice.
- iv) Promptly ship sample to the lab for analysis following chain of custody procedures.
- v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

- i) Benzene, toluene, ethylbenzene and xylene
 - EPA Method 602/8020
- ii) Total Petroleum Hydrocarbons
 - EPA Method 418.1, or;
 - EPA Method Modified 8015

c. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

1. Monitor Well Installation/Location

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

2. Monitor Well Construction

- a) Monitor well construction materials should be:
 - i) selected according to industry standards;
 - ii) chemically resistant to the contaminants to be monitored; and
 - iii) installed without the use of glues/adhesives.
- b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

3. Monitor Well Development

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

4. Sampling Procedures

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

- a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.
- b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.
- c) Label the sample containers with a unique code for each sample.
- d) Cool and store samples with cold packs or on ice.
- e) Promptly ship sample to the lab for analysis following chain of custody procedures.
- f) All samples must be analyzed within the Holding times for the laboratory analytical method specified by EPA.

5. Ground Water Laboratory Analysis

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

a. Analytical Methods

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;
- Various EPA 7000 series methods

VI. REMEDIATION

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

A. SOIL REMEDIATION

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

1. Contaminated Soils

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

- a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;
- b) Excavated to the maximum depth and horizontal extent practicable. Upon reaching this limit a sample should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants, or;
- c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;
- d) Managed according to an approved alternate method.

2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

a. Disposal

Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

b. Soil Treatment and Remediation Techniques

i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

B. GROUND WATER REMEDIATION

1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

VII. TERMINATION OF REMEDIAL ACTION

Remedial action may be terminated when the criteria described below have been met:

A. SOIL

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

B. GROUND WATER

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

VIII. FINAL CLOSURE

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

IX. FINAL REPORT

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

APPENDIX A

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

APPENDIX B

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge;
and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agency, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.

APPENDIX C

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
SECRETARY

OIL CONSERVATION COMMISSION

LAND COMMISSIONER
DESIGNEE, MEMBER

STATE PETROLEUM ENGINEER
WILLIAM J. LEMAY, CHAIRMAN

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NOTE: The following excerpt of the Water Quality Control Commission Regulations, WQCC 82-1 Part 3, was obtained from the BNA Environment Library (revision date: 11/14/96)

3-103. Standards for Ground Water of 10,000 mg/l TDS Concentration or Less.

The following standards are the allowable pH range and the maximum allowable concentration in ground water for the contaminants specified unless the existing condition exceeds the standard or unless otherwise provided in 3-109.D. or Section 3-110. Regardless of whether there is one contaminant or more than one contaminant present in ground water, when an existing pH or concentration of any water contaminant exceeds the standard specified in Subsection A, B, or C, the existing pH or concentration shall be the allowable limit, provided that the discharge at such concentrations will not result in concentrations at any place of withdrawal for present or reasonably foreseeable future use in excess of the standards of this section.

These standards shall apply to the dissolved portion of the contaminants specified with a definition of dissolved being that given in the publication "Methods for Chemical Analysis of Water and Waste of the U.S. Environmental Protection Agency," with the exception that standards for mercury and the organic compounds shall apply to the total unfiltered concentrations of the contaminants.

A. Human Health Standards-Ground water shall meet the standards of Section A and B unless otherwise provided. If more than one water contaminant affecting human health is present, the toxic pollutant criteria of Section 1-101.UU. for the combination of contaminants, or the Human Health Standard of Section 3-103.A. for each contaminant shall apply, whichever is more stringent.

Arsenic (As)	0.1 mg/l
Barium (Ba)	1.0 mg/l
Cadmium (Cd)	0.01 mg/l
Chromium (Cr)	0.05 mg/l
Cyanide (CN)	0.2 mg/l
Fluoride (F)	1.6 mg/l
Lead (Pb)	0.05 mg/l
Total Mercury (Hg)	0.002 mg/l
Nitrate (NO ₃ as N)	10.0 mg/l
Selenium (Se)	0.05 mg/l
Silver (Ag)	0.05 mg/l
Uranium (U)	5.0 mg/l
Radioactivity: Combined	
Radium-226 and Radium-228	30.0 pCi/l
Benzene	0.01 mg/l
Polychlorinated biphenyls (PCB's)	0.001 mg/l
Toluene	0.75 mg/l
Carbon Tetrachloride	0.01 mg/l
1,2-dichloroethane (EDC)	0.01 mg/l
1,1-dichloroethylene (1, 1-DCE)	0.005 mg/l

1,1,2,2-tetrachloroethylene (PCE)	0.02 mg/l
1,1,2-trichloroethylene (TCE)	0.1 mg/l
ethylbenzene	0.75 mg/l
total xylenes	0.62 mg/l
methylene chloride	0.1 mg/l
chloroform	0.1 mg/l
1,1-dichloroethane	0.025 mg/l
ethylene dibromide (EDB)	0.0001 mg/l
1,1,1-trichloroethane	0.06 mg/l
1,1,2-trichloroethane	0.01 mg/l
1,1,2,2-tetrachloroethane	0.01 mg/l
vinyl chloride	0.001 mg/l
PAHs: total naphthalene plus	0.03 mg/l
monomethylnaphthalenes	
benzo-a-pyrene	0.0007 mg/l

B. Other Standards for Domestic Water Supply

Chloride (Cl)	250. mg/l
Copper (Cu)	1.0 mg/l
Iron (Fe)	1.0 mg/l
Manganese (Mn)	0.2 mg/l
Phenols	0.005 mg/l
Sulfate (SO ₄)	600. mg/l
Total Dissolved Solids (TDS)	1000. mg/l
Zinc (Zn)	10.0 mg/l
pH	between 6 and 9

C. Standards for Irrigation Use - Ground water shall meet the standards of subsections A, B, and C unless otherwise provided.

Aluminum (Al)	5.0 mg/l
Boron (B)	0.75 mg/l
Cobalt (Co)	0.05 mg/l
Molybdenum (Mo)	1.0 mg/l
Nickel (Ni)	0.2 mg/l

SUBCHAPTER S : RISK REDUCTION STANDARDS

- §335.551. Purpose, Scope, and Applicability.
- §335.552. Definitions.
- §335.553. Required Information.
- §335.554. Attainment of Risk Reduction Standard Number 1: Closure/Remediation to Background.
- §335.555. Attainment of Risk Reduction Standard Number 2: Closure/Remediation to Health-Based Standards and Criteria.
- §335.556. Determination of Cleanup Levels for Risk Reduction Standard Number 2.
- §335.557. Criteria for Selection of Non-Residential Solid Requirements for Risk Reduction Standard Number 2.
- §335.558. Medium Specific Concentrations for Risk Reduction Standard Number 2.
- §335.559. Medium Specific Requirements and Adjustments for Risk Reduction Standard Number 2.
- §335.560. Post Closure Care and Deed Certification for Risk Reduction Standard Number 2.
- §335.561. Attainment of Risk Reduction Standard Number 3: Closure/Remediation With Controls.
- §335.562. Remedy Evaluation Factors for Risk Reduction Standard Number 3.
- §335.563. Media Cleanup Requirements for Risk Reduction Standard Number 3.
- §335.564. Post Closure Care not Required for Risk Reduction Standard Number 3.
- §335.565. Post Closure Care Required for Risk Reduction Standard Number 3.
- §335.566. Deed Recordation for Risk Reduction Standard Number 3.
- §335.567. Appendix I.
- §335.568. Appendix II.
- §335.569. Appendix III.

SUBCHAPTER S : RISK REDUCTION STANDARDS

§335.551. Purpose, Scope and Applicability.

(a) Purpose. This subchapter specifies the information and procedures necessary to demonstrate compliance with the three risk reduction standards of §335.8 of this title (relating to Closure and Remediation).

(b) Scope. The requirements of this subchapter will, when adequately carried out, assure adequate protection of human health and the environment from potential exposure to contaminants associated with releases from solid waste management facilities or other areas. Cleanup levels are specified for different types of contaminated media such as air, surface water, ground water, and soil, and for cross-media contamination pathways such as soil to ground water and soil to air. General procedures based on scientific principles are provided or referenced by these regulations so that specific numeric cleanup levels can be generated. The commission will periodically review the general procedures and revise these regulations as necessary.

(c) Applicability. The requirements of this subchapter apply to persons who undertake a closure or remediation in accordance with §335.8 of this title.

§335.552. Definitions.

The following words and terms when used in this subchapter shall have the following meanings, unless the context clearly indicates otherwise:

Carcinogen - Substances which have been classified for human carcinogenic risk based on the United States Environmental Protection Agency's Weight of Evidence System of Carcinogenicity as Group A - Human Carcinogen; Group B - Probable Human Carcinogen; or Group C - Possible Human Carcinogen.

Carcinogen classification - The basis by which substances are classified for human carcinogenic risk based on the United States Environmental Protection Agency's Weight of Evidence System for Carcinogenicity: Group A - Human Carcinogen; Group B - Probable Human Carcinogen; Group C - Possible Human Carcinogen; Group D - Not Classifiable as to Human Carcinogenicity; and Group E - Evidence of Non-Carcinogenicity for Humans.

Long-term effectiveness - The ability of a remediation or corrective action to maintain over time the required level of protection of human health and the environment.

Non-residential property - Any real property or portion of a property not currently being used for human habitation or for other purposes with a similar potential for human exposure, at which activities have been or are being conducted, having the primary Standard Industrial

Classification (SIC) major group numbers 01 - 48 inclusive, 49 except 4941, 50 - 67 inclusive, 72 - 79 inclusive, 80 except 8051, 8059, 8062, 8063, 8069, 81 and 82 except 8211, 8221, 8222, 83 except 8351, 8361, 84 - 86 except 8661, 87 - 91 inclusive, 92 except 9223, and 93 - 97 inclusive. Non-residential property includes all of the block(s) and lot(s) controlled by the same owner or operator that are vacant land, or that are used in conjunction with such business. For leased properties, non-residential property includes the leasehold and any external tank, surface impoundment, septic system, or any other structure, vessel, contrivance, or unit that provides, or are utilized, for the management of contaminants to or from the leasehold.

Permanence/permanent/permanently - The property of achieving the maximum degree of long-term effectiveness and of enduring indefinitely without posing the threat of any future release that would increase the risk above levels established for the facility or area.

Point of exposure - A location where human or environmental receptors can come into contact with contaminants; also, a location which can be arbitrarily determined for purposes of estimating or measuring the concentration of contaminants available for exposure.

Practical quantitation limit/PQL - The lowest concentration of an analyte which can be reliably quantified within specified limits of precision and accuracy during routine laboratory operating conditions. The PQL minimizes to the extent possible the effects of instrument and operator variability and the influences of the sample matrix and other contaminants or substances upon the quantitation of the analyte. "Specified limits of precision and accuracy" are the criteria which have been included in applicable regulations or which are listed in the quality control sections of the analytical method. The PQL may be directly obtained or derived from the following sources with preference given to the most recent, scientifically valid method: federal regulations; EPA guidance documents; calculation from interlaboratory studies; and experimentally determined analytical methods not available from other existing sources.

Residential property - Any property that does not exclusively meet the definition of non-residential property. Also, a portion of non-residential property that is used in part for residential activities, such as a day care center, is defined as residential.

Systemic toxicant - Substances shown either through epidemiological studies or through laboratory studies to cause adverse health effects other than cancer.

§335.553. Required Information.

(a) For risk reduction standard Number 1 or 2, the person shall provide a final report that documents attainment of the risk reduction standard in accordance with §335.554 or §335.555 (relating to Attainment of Risk Reduction Standard Number 1 and Attainment of Risk Reduction Standard Number 2). The report shall include but is not limited to descriptions of procedures and conclusions of the investigation to characterize the nature, extent, direction, rate of movement, volume, composition and concentration of contaminants in environmental media; basis for selecting environmental media of

concern; documentation supporting selection of exposure factors; descriptions of removal or decontamination procedures performed in closure or remediation; summaries of sampling methodology and analytical results which demonstrate that contaminants have been removed or decontaminated to applicable levels; and a document that the person proposes to use to fulfill the requirements of §335.560(b) of this title (relating to Post Closure Care and Deed Certification), as applicable.

(b) For risk reduction standard Number 3, the person shall conduct the activities set forth in paragraphs (1) - (4) of this subsection. The results of activities required by paragraphs (1) - (3) of this subsection may be combined to address a portion of a facility or one or more facilities of a similar nature or close proximity. The submittal shall be subject to review and approval by the executive director prior to carrying out the closure or remediation. Upon completion of the approved activity, the person shall submit the final report required by paragraph (4) of this subsection.

(1) The person shall prepare a remedial investigation report which contains sufficient documentation such as but not limited to descriptions of procedures and conclusions of the investigation to characterize the nature, extent, direction, rate of movement, volume, composition and concentration of contaminants in environmental media of concern, including summaries of sampling methodology and analytical results. Information obtained from attempts to attain Risk Reduction Standard Numbers 1 or 2 may be submitted for this purpose.

(2) The person shall prepare a baseline risk assessment report which describes the potential adverse effects under both current and future conditions caused by the release of contaminants in the absence of any actions to control or mitigate the release. The report shall also discuss the degree of uncertainty associated with the baseline risk assessment. Residential land use with on-site exposure shall be assumed to evaluate the future use condition unless the person demonstrates to the satisfaction of the executive director that a different land use assumption such as industrial use is more appropriate. The standard exposure factors set forth in Table 1 (located following paragraph (4) of this subsection) shall be used unless the person documents to the executive director's satisfaction that site-specific exposure data should be used instead.

(3) The person shall evaluate the relative abilities and effectiveness of potential remedies to achieve the requirements for remedies described in §335.561 of this title (relating to Attainment of Risk Reduction Standard Number 3) when considering the evaluation factors described in §335.562 of this title (relating to Remedy Evaluation Factors). Using this information, the person shall prepare a corrective measure study which recommends the remedy which best achieves the requirements for remedies described in §335.561 of this title. Persons may seek to satisfy the requirements of §335.564 of this title (relating to Post Closure Care not required for Risk Reduction Standard Number 3) by demonstrating in the corrective measure study using the procedures of §335.563 of this title (relating to Media Cleanup Requirements for Risk Reduction Standard Number 3) that no remedy needs to be performed since the existing conditions of the facility or area conform to the media cleanup requirements without the use of removal, decontamination or control measures. Persons may also seek to satisfy the requirements of §335.564 by demonstrating in the corrective measure study that following completion of their recommended removal and/or decontamination activities the conditions of the facility or area will conform to the media cleanup requirements of §335.563 without

the use of control measures. Upon review of the corrective measure study, the executive director may require the person to further evaluate the proposed remedy or to evaluate one or more additional remedies.

(4) The person shall submit to the executive director, for review and acceptance, a final report containing sufficient documentation which demonstrates that the remedy has been completed in accordance with the approved plan and also a document that the person proposes to use to fulfill the requirements of §335.566 of this title (relating to Deed Recordation for Risk Reduction Standard Number 3).

Table 1

Standard Exposure Factors (for use with §335.553(b)(2) and §335.563(e)).

Land Use	Exposure Pathway	Daily Intake Rate	Exposure Frequency	Exposure Duration	Body Weight
Residential	Ingestion of Potable Water	2 liters	350 days/yr	30 years	70 kg
	Ingestion of Soil and Dust ⁺	200 mg-child, age 1 - 6 100 mg-adult, age 7 - 31	350 days/yr	6 years* 24 years** (* = child, ** = adult)	15.1 kg* 70 kg**
	+ These factors yield the age-adjusted soil ingestion factor of 114 mg-yr/kg-day				
	Inhalation of Contaminants	20 cu.m.-total 15 cu.m.-indoor	350 days/yr	30 years	70 kg
Commercial/ Industrial	Ingestion of Potable Water	1 liter	250 days/yr	25 years	70 kg
	Ingestion of Soil and Dust	50 mg	250 days/yr	25 years	70 kg
	Inhalation of Volatiles	20 cu.m./workday	250 days/yr	25 years	70 kg
Agricultural Consumption of		42 g-fruit	350 days/yr	30 years	70 kg
	Homegrown Produce	80 g-vegetables			
	Factors for ingestion of potable water, soil and dust, and inhalation of volatiles: Use the Residential Land Use factors.				
Recreational Consumption of		10 g-freshwater	350 days/yr	30 years	70 kg
	Locally Caught Fish	15 g-saltwater			

(c) For risk reduction standards Numbers 1, 2, and 3, in order for a treatment process to achieve decontamination in contrast to being a control measure, the person must demonstrate to the satisfaction of the executive director that the treatment process permanently alters all contaminants to levels that will not pose a substantial present or future threat to human health and the environment, and must further demonstrate that any residue remaining in place from the treatment will not pose the threat of any future release that would increase the concentrations of contaminants in environmental media above the cleanup levels determined for that particular risk reduction standard.

(d) For risk reduction standards Numbers 1, 2, and 3, attainment of cleanup levels shall be demonstrated by collection and analysis of samples from the media of concern. Persons shall utilize techniques described in SW 846, Test Methods for Evaluating Solid Waste, United States Environmental Protection Agency, or other available guidance in developing a sampling and analysis plan appropriate for the distribution, composition and heterogeneity of contaminants and environmental media. A sufficient number of samples shall be collected and analyzed for individual compounds to both accurately assess the risk to human health and the environment posed by the facility or area and to demonstrate the attainment of cleanup levels. Non compound-specific analytical techniques (e.g., Total Petroleum Hydrocarbons, Total Organic Carbon, etc.) may, where appropriate for the nature of the wastes or contaminants, be used to aid in the determination of the lateral and vertical extent and volume of contaminated media; however, such non compound-specific analyses will serve only as indicator measures and must be appropriately supported by compound-specific analyses. Comparisons may be based on the following methods:

(1) Direct comparison of the results of analysis of discrete samples of the medium of concern with the cleanup level;

(2) For a data set of ten (10) or more samples, statistical comparison of the results of analysis utilizing the 95% confidence limit of the mean concentration of the contaminant as determined by the following expression: Cleanup Level $\leq \bar{x} + ts/\sqrt{n}$, where \bar{x} is the mean concentration, s is the standard deviation and t is a value from Table 2 (located following paragraph (3) of this subsection) based on the number of samples, and \sqrt{n} is the square root of the sample size; or

(3) Other statistical methods appropriate for the distribution of the data, subject to prior approval by the executive director.

Table 2

Values for "t" (for use with §335.553(d)).

n	t	n	t	n	t
10	1.812	20	1.725	50	1.676
11	1.796	21	1.721	60	1.671
12	1.782	22	1.717	70	1.667
13	1.771	23	1.714	80	1.664
14	1.761	24	1.711	90	1.662
15	1.753	25	1.708	100	1.661
16	1.746	30	1.697	120	1.658
17	1.740	35	1.690	145	1.656
18	1.734	40	1.684		
19	1.729	45	1.680		

(e) For risk reduction standards Numbers 2 and 3, in determining toxicity information for contaminants (e.g., Environmental Protection Agency carcinogen classification, type of toxicant, reference doses, carcinogenic slope factors, etc.), persons shall utilize values from the following sources in the order indicated. For risk reduction standard Number 2, persons may utilize data from these sources that are more current than those used to derive the unadjusted MSCs listed in §335.568 of this title (relating to Appendix II), provided that substantiating information is furnished to the executive director in the report required by §335.555(f) of this title (relating to Attainment of Risk Reduction Standard Number 2).

- (1) Integrated Risk Information System (IRIS);
- (2) Health Effects Assessment Summary Table (HEAST);
- (3) United States Environmental Protection Agency Criteria Documents;
- (4) Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profiles; and
- (5) Other scientifically valid published sources.

(f) For risk reduction standards Numbers 2 and 3, persons determining cleanup levels for contaminated media characterized by non compound-specific analytical techniques (e.g., Total Petroleum Hydrocarbons, Total Organic Carbon, etc.) and for which individual compounds such as hazardous constituents are not present as contaminants, must at a minimum consider other scientifically valid published numeric criteria to address: adverse impacts on environmental quality; adverse impacts on the public welfare and safety; conditions that present objectionable characteristics (e.g., taste, odor, etc.); or conditions that make a natural resource unfit for use.

§335.554. Attainment of Risk Reduction Standard Number 1: Closure/Remediation to Background.

(a) Compliance with this standard is attained when the criteria set forth in subsections (b) - (g) of this section are met.

(b) For closure of hazardous waste management units and response to unauthorized discharges of hazardous waste, all hazardous waste and hazardous waste residues and contaminated design and operating system components such as liners, leachate collection systems and dikes must be removed from the unit or area of the unauthorized discharge. For remediation of media that have become contaminated by releases from a hazardous waste management unit or by other unauthorized discharge of hazardous waste, the contaminated media must be removed or decontaminated to cleanup levels specified in this section.

(c) For closure of non-hazardous industrial solid waste management units, response to unauthorized discharges of non-hazardous industrial solid waste, and the remediation of media that have become contaminated by discharges of non-hazardous industrial solid waste or other contaminants, all waste and waste residues, contaminated design and operating system components such as liners, leachate collection systems and dikes, and contaminated media must be removed or decontaminated to cleanup levels specified in this section.

(d) Background as represented by results of analyses of samples taken from media that are unaffected by waste management or industrial activities shall be used to determine compliance with the requirements of this section. If the Practical Quantitation Limit (PQL) is greater than background, then the PQL rather than background shall be used as the cleanup level provided that the person satisfactorily demonstrates to the executive director that lower levels of quantitation of a contaminant are not possible.

(e) Attainment of cleanup levels shall be demonstrated by collection and analysis of samples from the media of concern using the procedures of §335.553(d) of this title (relating to Required Information).

(f) The person must submit a report to the executive director in accordance with §335.553(a) of this title (relating to Required Information) that documents compliance with the requirements of this section.

(g) Provided that attainment of this risk reduction standard for the facility or area can be demonstrated to the executive director pursuant to this section, the person is released from deed recordation requirements of §335.5 of this title (relating to Deed Recordation of Waste Disposal) and post-closure care responsibilities.

§335.555. Attainment of Risk Reduction Standard Number 2: Closure/Remediation to Health-Based Standards and Criteria.

(a) Compliance with this standard is attained when the criteria set forth in subsections (b) - (f) of this section are met.

(b) For closure of hazardous waste management units and response to unauthorized discharges of hazardous waste, all hazardous waste and hazardous waste residues must be removed from the unit or area of the unauthorized discharge. Contaminated design and operating system components such as liners, leachate collection systems and dikes must be removed from the unit or area of the unauthorized discharge. For remediation of media that have become contaminated by releases from a hazardous waste management unit or by other unauthorized discharge of hazardous waste, the contaminated media must be removed or decontaminated to cleanup levels specified in this section or such other lower levels necessary to be in conformance with current hazardous waste regulations.

(c) For closure of non-hazardous industrial solid waste management units, response to unauthorized discharges of non-hazardous industrial solid waste, and the remediation of media that have become contaminated by discharges of non-hazardous industrial solid waste or other contaminants, all waste and waste residues, contaminated design and operating system components such as liners, leachate collection systems and dikes, and contaminated media must be removed or decontaminated to cleanup levels specified in this section.

(d) The concentration of a contaminant in contaminated media of concern such as ground water, surface water, air or soil shall not exceed cleanup levels as defined in §335.556 of this title (relating to Determination of Cleanup Levels for Risk Reduction Standard Number 2).

(1) If the Practical Quantitation Limit (PQL) and/or the background concentration, determined in a manner consistent with §335.554 of this title (relating to Attainment of Risk Reduction Standard Number 1) for a contaminant is greater than the cleanup level, the greater of the PQL or background shall be used for determining compliance with the requirements of this section.

(2) Attainment of cleanup levels shall be demonstrated by collection and analysis of samples from the contaminated media of concern using the procedures of §335.553(d) of this title (relating to Required Information).

(e) The person must prepare a document that he intends to use to fulfill the deed certification requirements of §335.560 of this title (relating to Post Closure Care and Deed Certification for Risk

Reduction Standard Number 2) and include this document as part of the report of subsection (f) of this section.

(f) The person must submit a report to the executive director in accordance with §335.553(a) of this title (relating to Required Information) that documents compliance with the requirements of this section. The executive director may require additional information or analysis, such as but not limited to consideration of cumulative health effects and cross-media contamination, prior to accepting a certification of closure or remediation under this performance standard. Upon approval of the report by the executive director, the person shall comply with the requirements of §335.560 of this title (relating to Post Closure Care and Deed Certification for Risk Reduction Standard Number 2).

§335.556. Determination of Cleanup Levels for Risk Reduction Standard Number 2.

(a) For purposes of this risk reduction standard, cleanup levels for individual contaminants are represented by Texas or federal promulgated health-based standards, or, when these are not available or do not provide appropriate protection for human health or the environment, persons must develop cleanup levels based on procedures specified or referenced in this section for determining other numeric criteria, referred to as Medium Specific Concentrations (MSCs), and are required to perform any necessary adjustments to these numeric criteria. The MSCs address a single contaminant in a medium and consider one or more exposure pathways, specifically, water ingestion (Water MSC) and soil ingestion with inhalation of volatiles and particulates (Soil MSC). Where a contaminant in one medium has the potential to contaminate another medium, defined as cross-media contamination, additional numeric criteria are developed as cleanup levels (e.g., the soil-to-ground water contaminant pathway). To determine cleanup levels for contaminated media of concern, persons must perform the evaluations of subsections (b) - (e) of this section.

(b) In addition to the exposure pathways defined or referenced in this section, the person must evaluate other exposure pathways at or near the facility (e.g., dermal absorption, ingestion of contaminated fish, etc.) by which human populations (including sensitive subgroups) or environmental receptors (e.g., aquatic organisms, food-chain crops, etc.) are likely to be exposed to contaminants. If such evaluation indicates the need for additional remediation at the facility to adequately protect human health or environmental receptors, then the person shall develop numeric criteria by utilizing available guidance or scientific literature to serve in place of, or in addition to, cleanup levels determined pursuant to this section.

(c) The person must determine the appropriate exposure factors from §335.557 of this title (relating to Criteria for Selection of Non-Residential Soil Requirements for Risk Reduction Standard Number 2); and

(d) The person must calculate MSCs in accordance with §335.558 of this title (relating to Medium Specific Concentrations for Risk Reduction Standard Number 2); and

(e) The person must determine any cross-media requirements and modifications to cleanup levels in accordance with §335.559 of this title (relating to Medium Specific Requirements and Adjustments for Risk Reduction Standard Number 2).

§335.557. Criteria for Selection of Non-Residential Soil Requirements for Risk Reduction Standard Number 2.

All facilities or areas shall be subject to the residential soil requirements unless one of the conditions of paragraphs (1) - (3) of this section is satisfied for use of the non-residential soil requirements.

(1) For property located within the jurisdictional area of a zoning authority, persons may provide documentation that the property is zoned for commercial or industrial use.

(2) For property not located within the jurisdictional area of a zoning authority, persons may provide documentation that the activities being conducted on the property satisfy the definition for non-residential property (§335.553 of this title (relating to Definitions)).

(3) For government-owned (local, state or federal) property which does not satisfy either of the conditions of subsections (a) or (b) of this section but does have non-residential activities occurring on all or portions of the property, the person may provide documentation that access will be restricted such that the exposure assumptions remain valid for the duration of government control.

§335.558. Medium Specific Concentrations for Risk Reduction Standard Number 2.

(a) Medium specific concentrations (MSCs) for ingestion of surface water and ground water, and soil ingestion along with inhalation of volatiles and particulates are calculated according to the procedures specified in subsections (b) - (d) of this section based on residential exposure factors. MSCs are subject to additional numeric criteria and adjustments of §335.559 of this title (relating to Medium Specific Requirements and Adjustments for Risk Reduction Standard Number 2). The derivation of all equations is presented in §335.567 of this title (relating to Appendix I).

(b) For a contaminant which is a carcinogen, the MSC is the concentration which represents an excess upper bound lifetime cancer Target Risk (TR) of 0.000001 (also expressed as one (1) in one million (1,000,000)) for Class A and B carcinogens, or 0.00001 (also expressed as one (1) in one hundred thousand (100,000)) for Class C carcinogens due to continuous lifetime exposure as calculated using the equations and factors listed in paragraphs (1) and (2) of this subsection.

(1) Water MSC for Ingestion, in units of milligrams per liter (mg/L):

$$MSC = \frac{85.16 (TR)}{Sf_o}$$

Equation 1

where

Sf_o is the chemical-specific oral cancer slope factor.

(2) Soil MSC for Ingestion with Inhalation of volatiles and particulates, in units of milligram per kilogram (mg/kg):

$$MSC = \frac{5110 (TR)}{[(7.98 \times 10^{-3}) \times Sf_o] + (Sf_i \times [(450/VF) + (9.72 \times 10^{-8})])}] \quad \text{Equation 2}$$

where

VF is the chemical-specific soil-to-air volatilization factor.

(c) For a contaminant which is a systemic toxicant, the MSC is the concentration to which human populations (including sensitive subgroups) could be exposed by direct ingestion or inhalation on a daily basis without appreciable risk of deleterious effects during a lifetime. The MSC is calculated using the equations and factors listed in paragraphs (1) and (2) of this subsection.

(1) Water MSC for Ingestion in units of milligram per liter (mg/L):

$$MSC = 36.5 RfD_o \text{ mg/L} \quad \text{Equation 3}$$

where

RfD_o is the chemical-specific oral reference dose.

(2) Soil MSC for Ingestion with Inhalation of volatiles and particulates, in units of milligram per kilogram (mg/kg):

$$MSC = \frac{2190 \text{ mg/kg}}{[(7.98 \times 10^{-3}/RfD_o) + ((1/RfD_i) \times [(450/VF) + (9.72 \times 10^{-8})])}] \quad \text{Equation 4}$$

where

VF is the chemical-specific soil-to-air volatilization factor.

(d) Examples of unadjusted MSCs, standards and criteria are listed in §335.568 of this title (relating to Appendix II: "Examples of Medium Specific Concentrations, Standards and Criteria for Health-Based Closure/Remediation (31 TAC §335.558)". The commission will revise Appendix II on an annual basis to reflect newly promulgated standards and MSCs based on current toxicological data.

§335.559. Medium Specific Requirements and Adjustments for Risk Reduction Standard Number 2.

(a) Numeric cleanup levels. The subsections (b) - (h) of this section specify requirements that can define or modify numeric cleanup levels such as MSCs or require non-health based criteria to be addressed.

(b) Surface water. In determining the necessity for remediation at the facility, persons shall utilize Chapter 307 of this title (relating to Texas Surface Water Quality Standards) or, if those values are not available, Maximum Contaminant Levels (MCLs) promulgated under the Safe Drinking Water Act, or if MCLs are not available or appropriate, MSCs based upon human ingestion of the water. Any discharge or release into or adjacent to surface water, including storm water runoff, occurring during or after attainment of Risk Reduction Standard Number 2, shall be compliant with the Texas Surface Water Quality Standards of Chapter 307 of this title and may be subject to the permitting requirements of Chapter 305 of this title (relating to Consolidated Permits) or other authorization from the commission.

(c) Air. In determining the necessity for remediation at the facility, persons shall observe limitations established by the National Ambient Air Quality Standards (NAAQS) and the National Emission Standards for Hazardous Air Pollutants (NESHAPS) as found in the 40 Code of Federal Regulations Parts 50 and 61, respectively, and other applicable federal standards and guidelines of the United States Environmental Protection Agency. Also, limitations established by the Texas Air Control Board (TACB) under the Texas Clean Air Act, the State Implementation Plan or other federal requirements must be observed. Permit requirements, limitations established by Standard Exemptions, or other requirements of the TACB relative to atmospheric emissions and/or air quality may also apply.

(d) Ground water. The ground-water cleanup levels shall be determined by a consideration of the following:

(1) For residential exposure, the concentration of a contaminant dissolved in ground water must not exceed the Maximum Contaminant Level (MCL), if promulgated pursuant the Federal Safe Drinking Water Act, §141, otherwise the water MSC for ingestion determined pursuant to §335.556 of this title (relating to Determination of Cleanup Levels for Risk Reduction Standard Number 2). Phase-separated non-aqueous liquids released from the unit that is undergoing closure or remediation must be removed or decontaminated.

(2) For non-residential exposure, the concentration of a contaminant dissolved in ground water must not exceed the Maximum Contaminant Level (MCL) if promulgated pursuant to the Federal Safe Drinking Water Act, §141. If no MCL has been promulgated, the ground water concentration shall not exceed the water MSC for ingestion determined pursuant to §335.556 of this title (relating to Determination of Cleanup Levels for Risk Reduction Standard Number 2), which has been multiplied by a factor of 3.36 for carcinogens or 2.8 for systemic toxicants to account for lower ingestion rates associated with non-residential worker exposure. Persons must be able to demonstrate that the quality of ground water at the facility property boundary will be protective for residential

exposure. Phase-separated non-aqueous liquids released from the unit that is undergoing closure or remediation must be removed or decontaminated to the extent practicable.

(3) For residential and non-residential exposure, if the ground water at the facility or area has a naturally occurring background Total Dissolved Solids concentration greater than ten thousand (10,000) milligrams per liter, the cleanup level for a contaminant dissolved in this ground water determined pursuant to paragraph (1) or (2) of this subsection, as appropriate, may be adjusted by multiplying by one hundred (100). The resulting value becomes the maximum concentration for ground water for residential and non-residential exposure, respectively.

(4) The executive director may require the evaluation of additional exposure pathways or environmental receptors as part of the adjustment of paragraph (3) of this subsection.

(e) Soil. For all situations, concentrations of contaminants in soils must be protective of surface water, air and ground water as specified in subsections (b), (c) and (d) of this section. No soil remaining in place shall exhibit the hazardous waste characteristics of ignitability, corrosivity or reactivity as defined in 40 Code of Federal Regulations Part 261 Subpart C. The sum of concentrations of the volatile organic compounds in vapor phase in soil shall not exceed one thousand (1000) parts per million by weight or volume, as measured by EPA Test Method 8015 or calculated by using soil concentrations and Henry's Law constants.

(f) Residential soil requirements. In addition to the requirements of subsection (e) of this section, the concentration of a contaminant throughout the soil column (i.e., surface and subsurface soils) shall not exceed the lower of the Soil MSC, based upon residential human ingestion of soil and inhalation of particulates and volatiles (as defined in the preceeding section), and the Residential Soil-to-Ground Water Cross-Media Protection Concentration, a numeric value which is determined as follows:

(1) a value which is one hundred times the residential ground water cleanup level determined by the procedures of paragraph (1) of subsection (d) of this section. Examples of such values are listed in Appendix II; or

(2) a concentration in soil that does not produce a leachate in excess of MCLs or MSCs for ground water when subjected to the Synthetic Precipitation Leaching Procedure, Method 1312 of SW 846, Test Methods for Evaluating Solid Waste, United States Environmental Protection Agency. Other test methods that more accurately simulate conditions at the facility may be used in the demonstration in place of this method, subject to prior approval of the executive director.

(g) Non-residential soil requirements. Non-residential soils shall conform to the requirements of subsection (e) of this section. The concentration of a contaminant in near-surface soils (i.e., within two feet of the land surface) shall not exceed the lower of the Non-Residential Soil MSC defined in paragraph (1) of this subsection, based upon worker ingestion of soil and inhalation of particulates and volatiles, and the Non-Residential Soil-to-Ground Water Cross-Media Protection Concentration defined in paragraph (2) of this subsection. In no event shall compliance be achieved with the surface

soil criteria by applying two feet of clean soil onto the surface of a facility or area without prior approval from the executive director. The concentration of a contaminant in subsurface soils (i.e., greater than two feet in depth from the land surface) shall not exceed the Non-Residential Soil-to-Ground Water Cross-Media Protection Concentration.

(1) Non-residential soil MSC. The MSC is calculated using the equations and factors listed in subparagraphs (A) and (B) of this paragraph. The chemical-specific factors SF_o , SF_i , RfD_o , RfD_i , and VF are the same as for the soil MSCs of the preceding section. The derivation of all equations is presented in Appendix I.

(A) Carcinogenic Effects Equation, in units of milligram per kilogram
(mg/kg):

$$MSC = \frac{286.16 (TR) \text{ mg/kg}}{[(5 \times 10^{-5}) \times SF_o] + (SF_i \times [(20/VF) + (4.3 \times 10^{-9})])}] \quad \text{Equation 5}$$

(B) Systemic Toxicant Effects Equation, in units of milligram per kilogram
(mg/kg):

$$MSC = \frac{102.2 \text{ mg/kg}}{[(5 \times 10^{-5}/RfD_o) + ((1/RfD_i) \times [(20/VF) + (4.3 \times 10^{-9})])}] \quad \text{Equation 6}$$

(2) Non-residential soil-to-ground water cross-media protection concentration. Persons must demonstrate that a contaminant in soil does not pose the potential for a future release of leachate in excess of the ground-water concentration considered to be protective for non-residential worker exposure. Persons may make this demonstration by showing that a contaminant occurs in soil at less than the concentration described in either subparagraph (A) or (B) of this paragraph.

(A) a concentration which is one hundred (100) times the non-residential ground-water cleanup level determined by the procedures of paragraphs (2) or (3), as applicable, of subsection (d) of this section.

(B) a concentration in soil that does not produce a leachate in excess of the ground-water concentration of this paragraph when subjected to the Synthetic Precipitation Leaching Procedure, Method 1312 of SW 846, Test Methods for Evaluating Solid Waste, U. S. Environmental Protection Agency. Other test methods that more accurately simulate conditions at the facility may be used in the demonstration in place of this method, subject to prior approval by the executive director.

(h) Other criteria. For contaminants that do not exceed standards or criteria protective of human health and environmental receptors as determined by the procedures of this section but otherwise adversely impact environmental quality, or the public welfare and safety, or present objectionable characteristics (e.g., taste, odor, etc.), or make a natural resource unfit for use, other scientifically valid published criteria may be utilized such as but not limited to Threshold Limit Values for air and secondary maximum contaminant levels for water.

§335.560. Post Closure Care and Deed Certification for Risk Reduction Standard Number 2.

(a) Provided that attainment of this risk reduction standard for the facility can be demonstrated to the executive director pursuant to §335.555 of this title (relating to Attainment of Risk Reduction Standard Number 2), the conditions of subsections (b) and (c) of this section apply.

(b) The person is required to place in the county deed records of the county or counties in which such activities take place the information specified in paragraphs (1) - (4) of this subsection. The statements should be worded such that a lay person can easily understand them. An example format is provided in §335.569 of this title (relating to Appendix III). Proof of deed certification of the required information shall be provided to the executive director in writing no later than 90 days after acceptance of the report required by §335.555(f) of this title (relating to Attainment of Risk Reduction Standard Number 2).

(1) A certification signed by the person, showing the person's full name and title, and stating that closure or remediation of the facility or area was carried out in accordance with a plan designed to meet §335.555 of this title (relating to Risk Reduction Standard Number 2), which mandates that the remedy be designed to eliminate substantial present and future risk, such that no post-closure care or engineering or institutional control measures are required to protect human health and the environment.

(2) A metes and bounds description of the portion or portions of the tract of land on which closure or remediation of industrial solid waste, municipal hazardous waste or contaminants was achieved.

(3) For a facility that satisfies the conditions of §335.557 of this title (relating to Criteria for Selection of Non-Residential Soil Requirements for Risk Reduction Standard Number 2) for use of non-residential soil requirements, a statement that current or future owners of the facility must undertake actions as necessary to protect human health and the environment in accordance with the rules of the commission.

(4) A statement that information and documents concerning the closure or remediation of the facility or area are available for inspection upon request at the Texas Water Commission. The statement shall further describe the jurisdiction of the Texas Water Commission to review the establishment of the final cleanup criteria.

(c) The person is released from post-closure care responsibilities upon acceptance by the executive director of the proof of deed certification required by subsection (b) of this section.

§335.561. Attainment of Risk Reduction Standard Number 3: Closure/Remediation With Controls.

(a) Compliance with this standard is attained when, in the evaluation of the executive director, the person recommends the remedy which best achieves the requirements of subsections (b) - (d) of this section taking into consideration the evaluation factors of §335.562 of this title (relating to Remedy Evaluation Factors) and then following approval subsequently completes the remedy, submits the final report required by §335.553(b)(4) of this title (relating to Required Information), initiates any post-closure care required by §335.565 of this title (relating to Post closure care required for Risk Reduction Standard Number 3) and completes the deed recordation requirements of §335.566 of this title (relating to Deed Recordation for Risk Reduction Standard Number 3).

(b) A remedy must be permanent or, if that is not practicable, achieve the highest degree of long-term effectiveness possible;

(c) A remedy must be cost-effective in that it achieves the best balance between long-term effectiveness and cost for alternative remedies which meet the cleanup objectives for a facility; and

(d) A remedy must achieve media cleanup requirements as specified pursuant to §335.563 of this title (relating to Media Cleanup Requirements for Risk Reduction Standard Number 3).

§335.562. Remedy Evaluation Factors for Risk Reduction Standard Number 3.

(a) General. For closure/remediation in accordance with Risk Reduction Standard Number 3, persons shall consider the evaluation factors set forth in subsections (b) - (g) of this section when evaluating the relative abilities and effectiveness of potential remedies to achieve the requirements for remedies described in §335.561 of this title (relating to Attainment of Risk Reduction Standard Number 3). A description of the evaluation for these factors for the proposed remedy shall be included in the corrective measure study prepared pursuant to §335.553 (b) (3) of this title (relating to Required Information). Persons performing these evaluations shall submit to the executive director upon request such additional information as may reasonably be required to enable the executive director to determine whether such evaluation has been conducted in a manner compliant with this section.

(b) Compliance with other laws and regulations. Remedies shall be evaluated to determine attainment of cleanup requirements for other Texas or federal environmental laws which are either legally applicable to the facility or that address problems or situations that are sufficiently similar to those encountered at the facility that their use is well suited to the facility.

(c) Long-term effectiveness and permanence. Remedies shall be evaluated for long-term effectiveness. Factors that shall be considered in this evaluation include:

- (1) Magnitude of risks remaining after completion of the closure or remedial action;

(2) The type, degree and duration of post-closure care required including but not limited to operation and maintenance, monitoring, inspections and reports and their frequencies, or other activities which will be necessary to protect human health and the environment;

(3) Potential for exposure of humans and environmental receptors to contaminants remaining at the facility;

(4) Long-term reliability of any engineering and voluntary institutional controls; and

(5) Potential need for replacement of components of the remedy.

(d) Reduction of toxicity, mobility, or volume. Remedies shall be evaluated to determine the degree to which treatment could be used to significantly and irreversibly reduce the toxicity, mobility or volume of contaminants. Factors to be considered in this evaluation include:

(1) The amount of contaminants that will be treated or destroyed;

(2) The degree of expected reduction in toxicity, mobility, or volume;

(3) The type, quantity, toxicity, and mobility of contaminants remaining after treatment; and

(4) The degree to which the treatment is irreversible.

(e) Short-term effectiveness. The short-term effects of remedies shall be evaluated considering the following:

(1) Short-term risks that might be posed to the community, workers, or the environment during implementation of the remedy and the effectiveness and reliability of protective measures; and

(2) Time until protection is achieved.

(f) Implementability. The ease or difficulty of implementing the remedies shall be evaluated by considering the following types of factors:

(1) Degree of difficulty associated with constructing the remedy;

(2) Expected operational reliability of the remedy;

(3) Availability of necessary equipment and specialists;

(4) Available capacity and location of needed treatment, storage, and disposal services.

(g) Cost. The types of costs that shall be evaluated include the following:

- (1) Capital costs;
- (2) Operation and maintenance costs; and
- (3) Net present value of capital and operation and maintenance costs.

§335.563. Media Cleanup Requirements for Risk Reduction Standard Number 3.

(a) General. For closure/remediation in accordance with Risk Reduction Standard Number 3, persons shall propose media cleanup levels in accordance with the conditions set forth in subsections (b) - (j) of this section.

(b) Carcinogens. For known or suspected carcinogens, media cleanup levels shall be established at concentrations which represent an excess upperbound lifetime risk of between one in 10,000 and one in one million. The executive director will use one in one million as a goal in establishing such concentration limits. The cumulative excess risk to exposed populations (including sensitive subgroups) shall not be greater than one in 10,000.

(c) Systemic toxicants. For systemic toxicants, media cleanup levels shall represent concentrations to which the human population (including sensitive subgroups) could be exposed on a daily basis without appreciable risk of deleterious effect during a lifetime or part of a lifetime and where:

(1) The hazard quotient, which is the ratio of a single systemic toxicant exposure level for a specified time period to a reference dose for that systemic toxicant derived from the same time period, shall not exceed one; and

(2) The hazard index shall not exceed one. The hazard index is the sum of the hazard quotients for a single or multiple systemic toxicants which affect the same target organ or act by the same method of toxicity and act through a single or multiple media exposure pathways.

(d) Additional considerations. In establishing media cleanup levels pursuant to subsections (b) and (c) of this section, the executive director may consider and may direct persons who submit plans or reports in accordance with §335.553(b) of this title (relating to Required Information) to address the following:

- (1) Multiple contaminants in a medium;
- (2) Exposure to multiple contaminated media;
- (3) Reasonable expected future exposure conditions at the facility; and

(4) The technical limitations, effectiveness, practicability, or other relevant features of available remedies.

(e) Standard exposure factors. In determining media cleanup levels pursuant to subsections (b) and (c) of this section, persons shall use the standard exposure factors for residential use of the facility as set forward in Table 1 (located following §335.553) unless the person documents to the satisfaction of the executive director that:

(1) Site-specific data warrant deviation from the standard exposure factors; or

(2) A land use other than residential is more appropriate based on:

(A) historical, current, and probable future land use; and

(B) effectiveness of institutional or legal controls placed on the future use of the land.

(f) Air. Media cleanup levels for air will be established to meet the lowest of the values determined by the requirements of paragraphs (1) - (3) of this subsection.

(1) Concentrations of contaminants in air that emanate from a facility, area of soil contamination, or plume of contaminated ground water shall not exceed:

(A) National Ambient Air Quality Standards (NAAQS), National Emission Standards for Hazardous Air Pollutants (NESHAPAS) (as found in 40 Code of Federal Regulation Parts 50 and 61 respectively) and other applicable federal standards and guidelines of the Environmental Protection Agency; and

(B) concentrations established by the Texas Air Control Board (TACB) under the Texas Clean Air Act, the State Implementation Plan or other federal requirements. Permit requirements, limitations established by Standard Exemptions, or other requirements of the TACB relative to atmospheric emissions and/or air quality may also apply.

(2) For residential exposure conditions, concentrations of contaminants in air that emanate from a facility, area of soil contamination, or plume of contaminated ground water shall not exceed concentrations that satisfy subsections (b) - (e) of this section at exposure points located both within the contaminated area and at the property boundary.

(3) For nonresidential exposure conditions, concentrations of contaminants in air that emanate from a facility, area of soil contamination, or plume of contaminated ground water shall not exceed either OSHA permissible exposure limits, threshold limit values or other criteria applicable to an industrial exposure setting within the facility boundaries or concentrations that satisfy subsections (b) - (e) of this section at the property boundary.

(g) Surface water. In determining the necessity for remediation at the facility, persons shall utilize Chapter 307 of this title (relating to Texas Surface Water Quality Standards) or, if those values are not available, Maximum Contaminant Levels (MCLs) promulgated under the Safe Drinking Water Act or, if MCLs are not available or appropriate, values calculated pursuant to subsections (b) - (e) of this section based upon human ingestion of the water or other site-specific exposure pathway. Any discharge or release into or adjacent to surface water, including storm water runoff, occurring during or after attainment of Risk Reduction Standard Number 3, shall be compliant with Chapter 307 of this title and may be subject to the permitting requirements of Chapter 305 of this title (relating to Consolidated Permits) or other authorization from the commission.

(h) Ground water. Media cleanup levels for ground water that is a current or potential source of drinking water as defined in paragraph (1) of this subsection shall not exceed Maximum Contaminant Levels (MCLs) promulgated under the Safe Drinking Water Act or, if MCLs are not available, values calculated according to subsections (b) - (e) of this section based upon human ingestion of the water. Cleanup levels for ground water may be subject to the modifications of paragraphs (2) - (4) of this subsection.

(1) Ground water that has a background Total Dissolved Solids (TDS) content less than or equal to 10,000 milligrams per liter (mg/L) and that occurs within a geologic zone that is sufficiently permeable to transmit water to a pumping well in usable quantities shall be considered a current or potential source of drinking water for the purpose of determining cleanup levels.

(2) The cleanup levels shall be achieved throughout the plume of contaminated ground water, with the exception of the circumstances described in subparagraphs (A) - (C) of this paragraph.

(A) when Alternate Concentration Limits of §335.160(b) of this title (relating to Alternate Concentration Limits) have been approved in a permit issued by the commission for a hazardous waste management facility.

(B) when the selected remedy calls for waste to be left in place and when appropriate control measures are installed or operated, the executive director may authorize the zone underlying the area encompassing the original source(s) of release to be excluded from this requirement.

(C) when the person documents to the executive director's satisfaction pursuant to subsection (e) of this section that a future land use other than residential is appropriate for the facility or area and further demonstrates that institutional or legal controls will effectively prevent use of the contaminated ground water, the extent of plume remediation may be determined in a manner consistent with §335.160(b) of this title (relating to Alternate Concentration Limits).

(3) The executive director may determine that remediation of ground water to the extent required in paragraphs (1) or (2) of this subsection is not necessary if the person demonstrates to the executive director's satisfaction that:

(A) the contaminant is present in ground water that is not a current or potential source of drinking water and the contaminated ground water is not hydraulically connected with and is not likely to migrate to either surface water or to ground water that is a current or potential source of drinking water; or

(B) restoration of the ground water to these levels is technically impracticable.

(4) If a determination is made pursuant to paragraph (3) of this subsection, the executive director may require any alternative measures or cleanup levels that are necessary to protect human health and the environment. At a minimum, for all cases described in this subsection, phase-separated non-aqueous liquids shall be removed from ground water zones to the extent practicable.

(i) Soil. Concentrations of contaminants in soil shall not exceed the following values:

(1) The values calculated pursuant to subsections (b) - (d) of this section based upon human ingestion of the soils at all points where direct contact exposure to the soils may occur, and

(2) Values which will allow the air, surface water, and ground-water cleanup levels specified in subsections (f), (g), and (h) of this section, respectively, to be maintained over time taking into account the effects of engineering controls.

(A) such determinations shall be based on sound scientific principles including fate and transport evaluation of contaminant migration. Procedures and conclusions shall be documented to the satisfaction of the executive director.

(B) the executive director may require the evaluation of additional migration pathways beyond those listed in this section if determined necessary. Such additional pathways may include but are not limited to food chain contamination, impairment of soil for agricultural purposes, phytotoxicity, accumulations of contaminants in sediment of surface water bodies, or other impairments of natural resources, land, or water use.

(j) Other adjustments. Cleanup levels may be adjusted according to paragraphs (1) - (3) of this subsection.

(1) If the Practical Quantitation Limit (PQL) or the background concentration (represented by results of analyses of samples taken from media that are not affected by waste management or industrial activities) for a contaminant is greater than the cleanup level determined by procedures of this section, then the greater of the PQL or background shall become the cleanup level.

(2) Other scientifically valid published criteria, such as but not limited to Threshold Limit Values for air and secondary maximum contaminant levels for water, shall be utilized as cleanup levels for contaminants for which the procedures of this section are not appropriate (e.g., mixtures or substances that do not have toxicological data) or that do not exceed standards or criteria protective of human health as determined by the procedures of this section but otherwise adversely impact

environmental quality, or the public welfare and safety, or present objectionable characteristics (e.g., taste, odor, etc.), or make a natural resource unfit for use.

(3) More stringent cleanup levels may be established for a facility than are specified in this section if, by utilizing available guidance or scientific literature, the executive director determines that it is necessary to protect environmental receptors.

§335.564. Post Closure Care not required for Risk Reduction Standard Number 3.

In cases under Risk Reduction Standard Number 3 where the executive director determines that neither engineering nor institutional control measures are required to protect human health and the environment, the person is released from post closure care responsibilities but is required to deed record the facility in accordance with §335.566 of this title (relating to Deed Recordation for Risk Reduction Standard Number 3).

§335.565. Post closure care required for Risk Reduction Standard Number 3.

In cases under Risk Reduction Standard Number 3 where the executive director determines that either engineering or institutional control measures are required to protect human health and the environment, the person shall comply with the requirements of paragraphs (1) and (2) below, as applicable, and deed record the facility in accordance with §335.566 of this title (relating to Deed Recordation for Risk Reduction Standard Number 3).

(1) Carry out the post-closure requirements as evaluated and approved by the remedy evaluation process described in §335.562 of this title (relating to Remedy Evaluation Factors).

(2) For hazardous waste storage, processing or disposal facilities, the person must also satisfy the applicable requirements of Subchapters E and F of this chapter (relating to Interim Standards for Hazardous Waste Storage, Processing, or Disposal Facilities; and Permitting Standards for Owners and Operators of Hazardous Waste Storage, Processing, or Disposal Facilities, respectively).

§335.566. Deed Recordation for Risk Reduction Standard Number 3.

(a) Within 90 days after acceptance by the executive director of the final report referenced in §335.561(a) of this title (relating to Attainment of Risk Reduction Standard Number 3), the person must record in the county deed records of the county or counties in which such activities take place the information specified in subsections (b) - (e) of this section and submit written proof of such recordation to the executive director. The statements should be worded such that a lay person can easily understand them. An example format is provided in §335.569 of this title (relating to Appendix III).

(b) A certification, signed by the person, showing the person's full name and title, and stating: that remediation of the facility or area was carried out in accordance with a plan designed to meet §335.561 of this title (relating to Risk Reduction Standard Number 3), which mandates that the remedy be designed to eliminate or reduce to the maximum extent practicable, substantial present and future risk; and whether continued post-closure care or engineering or institutional control measures ("Post-Closure Measures") are required to protect human health and the environment together with a description of any required Post-Closure Measures;

(c) A description of any institutional or legal controls placed by the person on the future use of the property. The notice shall indicate that the current or future owner must undertake actions as necessary to protect human health and the environment in accordance with the rules of the commission.

(d) A metes and bounds description of the portion or portions of the tract of land on which closure or remediation of industrial solid waste, municipal hazardous waste or contaminants was achieved; and

(e) A statement that information and documents concerning the closure or remediation of the facility or area are available for inspection upon request at the Texas Water Commission. The statement shall further describe the jurisdiction of the Texas Water Commission to review the establishment of the final cleanup criteria.

§335.567. Appendix I.

Derivation of Reduced Equations for Calculation of Medium Specific Concentrations of Risk Reduction Standard Number 2.

Equation 1 - MSC for Ingestion of Water; Carcinogenic Effects:

$$MSC = \frac{85.16 \text{ TR}}{Sf_o}$$

is derived from the following expression:

$$MSC = \frac{TR \times BW \times AT_c \times 365 \text{ days/yr}}{Sf_o \times IR_w \times EF \times ED \times A}$$

Equation 2 - MSC for Ingestion of Soils and Inhalation of Volatiles
and Particulates; Residential Scenario; Carcinogenic Effects:

$$MSC = \frac{5110 \text{ TR}}{[(7.98 \times 10^{-3}) \times Sf_o] + (Sf_i \times [(450/VF) + (9.72 \times 10^{-8})])}$$

is derived from the following expression:

$$MSC = \frac{TR \times BW \times AT_c \times 365 \text{ days/yr}}{EF [(BW \times Sf_o \times 10^{-6} \text{ Kg/mg} \times IF_{\text{soil/adj.}}) + (Sf_i \times ED \times IR_{\text{air}} \times [1/VF + 1/PEF])]}$$

Equation 3 - MSC for Ingestion of Water; Systemic Toxicant Effects:

$$MSC = 36.5 \text{ RfD}_o$$

is derived from the following expression:

$$MSC = \frac{THI \times RfD_o \times BW \times AT_c \times 365 \text{ days/yr}}{Ir_w \times EF \times ED \times A}$$

Equation 4 - MSC for Ingestion of Soils and Inhalation of Volatiles and
Particulates; Residential Scenario; Systemic Toxicant Effects:

$$\text{MSC} = \frac{2190}{[(7.98 \times 10^{-3}/\text{RfD}_o) + ((1/\text{RfD}_i) \times [(450/\text{VF}) + (9.72 \times 10^{-8})])]$$

is derived from the following expression:

$$\text{MSC} = \frac{\text{THI} \times \text{BW} \times \text{AT}_c \times 365 \text{ days/yr}}{\text{EF} [((1/\text{RfD}_o) \times \text{BW} \times 10^{-6} \text{ Kg/mg} \times \text{IR}_{\text{soil/adj}}) + ((1/\text{RfD}_i) \times \text{ED} \times \text{IR}_{\text{air}} [1/\text{VF} + 1/\text{PEF}])]$$

Equation 5 - MSC for Worker Ingestion of Soils and Inhalation of
Volatiles and Particulates; Carcinogenic Effects:

$$\text{MSC} = \frac{286.16 \text{ TR}}{[(5 \times 10^{-5}) \times \text{SF}_o) + (\text{SF}_i \times [(20/\text{VF}) + (4.3 \times 10^{-9})])]$$

is derived from the following expression:

$$\text{MSC} = \frac{\text{TR} \times \text{BW} \times \text{AT}_c \times 365 \text{ days/yr}}{\text{EF} \times \text{ED} \times [(\text{SF}_o \times 10^{-6} \text{ Kg/mg} \times \text{IR}_{\text{soil}}) + (\text{SF}_i \times \text{IR}_{\text{air}} \times [1/\text{VF} + 1/\text{PEF}])]$$

Equation 6 - MSC for Worker Ingestion of Soils and Inhalation of
Volatiles and Particulates; Systemic Toxicant Effects:

$$\text{MSC} = \frac{102.2}{[(5 \times 10^{-5}/\text{RfD}_o) + ((1/\text{RfD}_i) \times [(20/\text{VF}) + (4.3 \times 10^{-9})])]$$

is derived from the following expression:

$$\text{MSC} = \frac{\text{THI} \times \text{BW} \times \text{AT}_c \times 365 \text{ days/yr}}{\text{EF} \times \text{ED} \times [((1/\text{RfD}_o) \times 10^{-6} \text{ Kg/mg} \times \text{IR}_{\text{soil}}) + ((1/\text{RfD}_i) \times \text{IR}_{\text{air}} \times (1/\text{VF} + 1/\text{PEF}))]$$

VF: Parameters, Definitions and Values for the Soil to
Air Volatilization Factor

$$VF(m^3/kg) = \frac{(LS \times V \times DH)}{A} \times \frac{(3.14 \times p \times T)^{1/2}}{(2 \times D_{ei} \times E \times K_{as} \times 10^{-3} \text{ kg/g})}$$

SITE DATA/DEFAULT FACTORS:

LS	Length of contaminated area (m)	=	45
E	true soil porosity (unitless)	=	0.35
V	wind speed in mixing zone (m/s)	=	2.25
ps	true soil density (g/cm ³)	=	2.65
DH	diffusion height (m)	=	2
T	exposure interval (s)	=	7.90e+08
A	area of contamination (cm ²)	=	2.03e+07
OC	organic carbon content, soil fraction (unitless)	=	0.02

CHEMICAL SPECIFIC DATA:

D _i	Molecular Diffusivity (cm ² /s).
H	Henry's Law Constant (atm-m ³ /mol).
K _{oc}	Organic Carbon Partition Coefficient (cm ³ /g).
D _{ei}	Effective Diffusivity (cm ² /sec), calculated from D _i X E ^{0.33} .
K _d	Soil-water partition coefficient (cm ³ /g), calculated from K _{oc} X OC.
p	Alpha, (cm ² /s) = $\frac{(D_{ei} \times E)}{E + (p_s)(1-E)/K_{as}}$

K_{as} Soil/air partition coefficient (g soil/cm³ air). Calculated from K_{as} = (H/K_d) X 41.

Parameters, Definitions and Values used in Equations 1 - 6 are displayed in the following table:

Parameters	Definitions (Units)	Values
MSC	Medium Specific Concentration (mg/Kg)	chemical-specific
TR	Target excess individual lifetime cancer risk (unitless)	10^{-6} for Class A and B carcinogens; 10^{-5} for Class C carcinogens
	Target hazard index (unitless)	1
THI	Oral cancer slope factor ((mg/Kg-day) ⁻¹)	chemical-specific
SF _o	Inhalation cancer slope factor ((mg/Kg-day) ⁻¹)	chemical-specific
SF _i	Oral chronic reference dose (mg/Kg-day)	chemical-specific
	Inhalation chronic reference dose (mg/Kg-day)	chemical-specific
RfD _o	Adult body weight (Kg)	70 Kg
	Averaging time for carcinogens (yr)	chemical-specific
RfD _i	Averaging time for systemic toxicants (yr)	70 yr
BW	Exposure frequency (days/yr)	70 yr
AT _c	Exposure duration (yr)	
AT _s	Daily water ingestion rate (liter/day)	30 yr residential 25 yr worker
EF	Workday soil ingestion rate (mg/day)	350 residential 250 worker
ED	Age-adjusted ingestion factor (mg-yr/Kg-day)	30 yr residential 25 yr worker
IR _w	Daily indoor inhalation rate (m ³ /day)	2 l/day residential 1 l/day worker
	Particulate emission factor (m ³ /Kg)	50 mg/day
IR _{soil}	Soil-to-air volatilization factor	114 mg-yr/Kg-day
IF _{soil/adj}	Absorption factor	
IR _{air}		15 m ³ /day residential 20 m ³ /8 hr day worker
PEF		4.63×10^9 m ³ /Kg
VF		chemical-specific
A		1

Reference: U.S. EPA, OSWER Directive 9285.7-01B, Dec. 13, 1991, Human Health Evaluation Manual, Part B: "Development of Risk-based Preliminary Remediation Goals"

§335.568. Appendix II.

Examples of Medium-Specific Concentrations, Standards and Criteria for Health-Based Closure/Remediation (See §335.558 of this title (relating to Medium Specific Concentration of Risk Reduction Standards Number 2.))

CAS #	=	Chemical Abstracts Service Number for the Specific Compound.
GW	=	Ground Water. Maximum Concentration in Ground Water (mg/L) for residential exposure conditions.
GWP-Res	=	Ground-Water Protection Standard for Residential Use. Concentration in Residential Soil Assumed Protective of Ground Water Considering Cross-media Contamination of Ground Water from Contaminated Soil (mg/kg).
GWP-Ind	=	Ground-Water Protection Standard for Industrial Use. Concentration in Industrial Soil Assumed Protective of Ground Water Considering Cross-media Contamination of Ground Water from Contaminated Soil (mg/kg).
SAI-Res	=	Soil/Air and Ingestion Standard for Residential Use. Maximum Concentration in Residential Soil Considering Cross-media Contamination of Air and the Human Ingestion and Inhalation Pathways (mg/kg).
SAI-Ind	=	Soil/Air and Ingestion Standard for Industrial Use. Maximum Concentration in Industrial Soil Considering Cross-media Contamination of Air and the Human Ingestion and Inhalation Pathways (mg/kg).

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CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Acenaphthene	83-32-9	2.19e+00	2.19e+02	6.13e+02	1.34e+04 (13)	4.43e+04 (13)
Acetone	67-64-1	3.65e+00	3.65e+02	1.02e+03	3.82e+03 (13)	4.16e+03 (13)
Acetonitrile	75-05-8	2.19e-01	2.19e+01	6.13e+01	1.65e+03	1.23e+04
Acetophenone	98-86-2	3.65e+00	3.65e+02	1.02e+03	2.26e+04	8.15e+04
Acrolein	107-02-8	7.30e-01 (12)	7.30e+01	2.04e+02	1.56e+03 (12)	2.04e+04 (12)
Acrylamide	79-06-1	1.89e-05	1.89e-03	6.36e-03	1.42e-01	1.27e+00
Acrylonitrile	107-13-1	1.58e-04	1.58e-02	5.30e-02	1.15e-01 (13)	1.44e-01 (13)
Alachlor	15972-60-8	2.00e-03 (9)	2.00e-01	2.00e-01	7.95e+00	7.10e+01
Aldicarb	116-06-3	3.00e-03 (9)	3.00e-01	3.00e-01	5.49e+01	4.09e+02
Aldicarb Sulfone	1646-88-4	2.00e-03 (9)	2.00e-01	2.00e-01	8.23e+01	6.13e+02
Aldicarb Sulfoxide	1646-88-3	4.00e-03 (9)	4.00e-01	4.00e-01	5.49e+01	4.09e+02
Aldrin	309-00-2	5.01e-06	5.01e-04	1.68e-03	3.77e-02	3.36e-01
Aluminum Phosphide	20859-73-8	1.46e-02	1.46e+00	4.09e+00	1.10e+02	8.18e+02
Aniline	62-53-3	1.49e-02	1.49e+00	5.02e+00	4.18e-02 (13)	4.80e-02 (13)
Anthracene	120-12-7	1.10e+01	1.10e+03	3.07e+03	5.91e+04 (13)	1.51e+05 (13)
Antimony	7440-36-0	6.00e-03 (9)	6.00e-01	6.00e-01	1.10e+02	8.18e+02
Arsenic	7440-38-2	5.00e-02 (9)	5.00e+00	5.00e+00	3.66e-01	3.27e+00
Atrazine	1912-24-9	3.00e-03 (9)	3.00e-01	3.00e-01	2.88e+01	2.58e+02
Barium (ionic)	7440-39-3	2.00e+00 (9)	2.00e+02	2.00e+02	1.91e+04	1.37e+05
Benzene	71-43-2	5.00e-03 (9)	5.00e-01	5.00e-01	1.33e+00 (13)	1.62e+00 (13)
Benzidine	92-87-5	3.70e-07	3.70e-05	1.24e-04	2.78e-03	2.49e-02
Beryllium	7440-41-7	4.00e-03 (9)	4.00e-01	4.00e-01	1.49e-01	1.33e+00
Biphenyl	92-52-4	1.83e+00	1.83e+02	5.11e+02	6.68e+03 (13)	1.11e+04 (13)

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CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Bis (2-chloro-ethyl) ether	111-44-4	7.74e-05	7.74e-03	2.60e-02	2.20e-01 (13)	3.77e-01 (13)
Bis (2-chloroisopropyl) ether	39638-32-9	1.22e-02	1.22e+00	4.09e+00	4.50e+01 (13)	9.05e+01 (13)
Bis (2-ethyl-hexyl) phthalate	117-81-7	6.08e-03	6.08e-01	2.04e+00	4.57e+01	4.09e+02
Bromodichloromethane	75-27-4	1.00e-01 (9)	1.00e+01	1.00e+01	7.19e-01 (13)	9.46e-01 (13)
Bromoform	75-25-2	1.00e-01 (9)	1.00e+01	1.00e+01	8.11e+01	7.24e+02
Bromomethane	74-83-9	5.11e-02	5.11e+00	1.43e+01	2.44e+01 (13)	2.47e+01 (13)
Butyl-4,6-dinitrophenol, 2-sec-	88-85-7	3.65e-02	3.65e+00	1.02e+01	2.74e+02	2.04e+03
Cadmium	7440-43-9	5.00e-03 (9)	5.00e-01	5.00e-01	1.37e+02	1.02e+03
Carbofuran	1563-66-2	4.00e-02 (9)	4.00e+00	4.00e+00	1.37e+03	1.02e+04
Carbon Disulfide	75-15-0	3.65e+00	3.65e+02	1.02e+03	2.45e+01 (13)	2.34e+01 (13)
CarbonTetrachloride	56-23-5	5.00e-03 (9)	5.00e-01	5.00e-01	4.14e-01 (13)	5.13e-01 (13)
Chlordane	57-74-9	2.00e-03 (9)	2.00e-01	2.00e-01	4.93e-01	4.40e+00
Chloroaniline, p-	106-47-8	1.46e-01	1.46e+01	4.09e+01	1.10e+03	8.18e+03
Chlorobenzene	108-90-7	1.00e-01 (9)	1.00e+01	1.00e+01	2.56e+02 (13)	2.56e+02 (13)
Chlorobenzilate	510-15-6	7.30e-01	7.30e+01	2.04e+02	5.49e+03	4.09e+04
Chloroethane (Ethylchloride)	75-00-3	7.30e-01	7.30e+01	2.04e+02	4.99e+03 (13)	2.30e+04 (13)
Chloroform	67-66-3	1.00e-01 (9)	1.00e+01	1.00e+01	4.37e-01 (13)	5.04e-01 (13)
Chloronaphthalene, 2-	91-58-7	2.92e+00	2.92e+02	8.18e+02	2.20e+04	1.64e+05
2-chlorophenol	95-57-8	1.83e-01	1.83e+01	5.11e+01	1.37e+03	1.02e+04
Chromium (total)	7440-47-3	1.00e-01 (9)	1.00e+01	1.00e+01	3.91e+02 (12)	5.11e+03 (12)
Chromium (VI)	7440-47-3	1.00e-01 (9)	1.00e+01	1.00e+01	3.91e+02 (12)	5.11e+03 (12)
Cresol, m-	108-39-4	1.83e+00 (12)	1.83e+02	5.11e+02	3.91e+03 (12)	5.11e+04 (12)
Cresol, o-	95-48-7	1.83e+00 (12)	1.83e+02	5.11e+02	3.91e+03 (12)	5.11e+04 (12)

CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Cresol, p-	106-44-5	1.83e+00 (12)	1.83e+02	5.11e+02	3.91e+03 (12)	5.11e+04 (12)
Cyanide	57-12-5	2.00e-01 (9)	2.00e+01	2.00e+01	5.49e+03	4.09e+04
DDD	72-54-8	3.55e-04	3.55e-02	1.19e-01	2.67e+00	2.38e+01
DDE	72-55-9	2.50e-04	2.50e-02	8.41e-02	1.88e+00	1.68e+01
DDT	50-29-3	2.50e-04	2.50e-02	8.41e-02	1.88e+00	1.68e+01
Di-n-butyl phthalate	84-74-2	3.65e+00	3.65e+02	1.02e+03	2.74e+04	2.04e+05
Di-n-octyl phthalate	117-81-7	7.30e-01	7.30e+01	2.04e+02	5.49e+03	4.09e+04
Dibromo-3-chloropropane, 1,2-	96-12-8	2.00e-04 (9)	2.00e-02	2.00e-02	4.57e-01	4.09e+00
Dibromochloromethane	124-48-1	1.00e-01 (9)	1.00e+01	1.00e+01	7.62e+01	6.81e+02
Dichlorobenzene (1,2)	95-50-1	6.00e-01 (9)	6.00e+01	6.00e+01	6.69e+03 (13)	8.39e+03 (13)
Dichlorobenzene (1,3)	541-73-1	6.00e-01 (9)	6.00e+01	6.00e+01	7.61e+03 (13)	9.99e+03 (13)
Dichlorobenzene (1,4)	106-46-7	7.50e-02 (9)	7.50e+00	7.50e+00	8.64e+01 (13)	1.38e+02 (13)
Dichlorodifluoromethane	75-71-8	7.30e+00	7.30e+02	2.04e+03	5.00e+01 (13)	4.79e+01 (13)
Dichloroethane (1,1)	75-34-3	3.65e+00	3.65e+02	1.02e+03	7.30e+03 (13)	2.04e+04 (13)
Dichloroethane (1,2)	107-06-2	5.00e-03 (9)	5.00e-01	5.00e-01	4.17e-01 (13)	5.05e-01 (13)
Dichloroethylene (1,1)	75-35-4	7.00e-03 (9)	7.00e-01	7.00e-01	7.15e-01 (13)	8.72e-01 (13)
Dichloroethylene, cis-(1,2)	156-59-2	7.00e-02 (9)	7.00e+00	7.00e+00	1.08e+02 (13)	1.08e+02 (13)
Dichloroethylene, trans-(1,2)	156-60-5	1.00e-01 (9)	1.00e+01	1.00e+01	2.56e+02 (13)	2.56e+02 (13)
Dichlorophenol, 2,4-	120-83-2	1.10e-01	1.10e+01	3.07e+01	8.23e+02	6.13e+03
Dichlorophenoxyacetic acid, 2,4-	94-75-7	7.00e-02 (9)	7.00e+00	7.00e+00	2.74e+03	2.04e+04
Dichloropropane (1,2)	78-87-5	5.00e-03 (9)	5.00e-01	5.00e-01	6.88e-01 (13)	8.43e-01 (13)
Dieldrin	60-57-1	5.32e-06	5.32e-04	1.79e-03	4.00e-02	3.57e-01
Diethyl phthalate	84-66-2	2.92e+01	2.92e+03	8.18e+03	2.20e+05	NHHB (16)

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CONSTITUENT	CAS #	GW (1,4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Diethylhexyl adipate	103-23-1	5.00e-01 (9)	5.00e+01	5.00e+01	5.34e+03	4.77e+04
Dimethoate	60-51-5	7.30e-03	7.30e-01	2.04e+00	5.49e+01	4.09e+02
Dimethyl phenol, 2,4-	105-67-9	7.30e-01	7.30e+01	2.04e+02	5.49e+03	4.09e+04
Dinitrobenzene, 1,3-	99-65-0	3.65e-03	3.65e-01	1.02e+00	2.74e+01	2.04e+02
Dinitrophenol, 2,4-	51-28-5	7.30e-02	7.30e+00	2.04e+01	5.49e+02	4.09e+03
Dioxane (1,4)	123-91-1	7.74e-03	7.74e-01	2.60e+00	1.55e+01 (13)	2.31e+01 (13)
Diphenylamine	122-39-4	9.13e-01	9.13e+01	2.56e+02	6.86e+03	5.11e+04
Diphenylhydrazine, 1,2-	122-66-7	1.06e-04	1.06e-02	3.58e-02	8.00e-01	7.15e+00
Disulfoton	298-04-4	1.46e-03	1.46e-01	4.09e-01	1.10e+01	8.18e+01
Endosulfan	115-29-7	1.83e-03	1.83e-01	5.11e-01	1.37e+01	1.02e+02
Endothall	145-73-3	1.00e-01 (9)	1.00e+01	1.00e+01	5.49e+03	4.09e+04
Endrin	72-20-8	2.00e-03 (9)	2.00e-01	2.00e-01	8.23e+01	6.13e+02
Ethoxy ethanol, 2-	110-80-5	1.46e+01	1.46e+03	4.09e+03	1.10e+05	8.17e+05
Ethoxyethanol acetate, 2-	111-15-9	1.10e+01	1.10e+03	3.07e+03	8.23e+04	6.13e+05
Ethyl benzene	100-41-4	7.00e-01 (9)	7.00e+01	7.00e+01	1.14e+04 (13)	1.70e+04 (13)
Ethylene dibromide	106-93-4	5.00e-05 (9)	5.00e-03	5.00e-03	7.09e-03 (13)	4.53e-02 (13)
Ethylene glycol	107-21-1	7.30e+01	7.30e+03	2.04e+04	5.49e+05	NHHB (16)
Ethylene oxide	75-21-8	8.35e-05	8.35e-03	2.80e-02	1.11e-01 (13)	1.51e-01 (13)
Fluoranthene	206-44-0	1.46e+00	1.46e+02	4.09e+02	1.10e+04	8.18e+04
Fluorene	86-73-7	1.46e+00	1.46e+02	4.09e+02	9.60e+03 (13)	3.87e+04 (13)
Fluorides	7782-41-4	4.00e+00 (9)	4.00e+02	4.00e+02	1.65e+04	1.23e+05
Formaldehyde	50-00-0	7.30e+00 (12)	7.30e+02	2.04e+03	1.56e+04 (12)	2.04e+05 (12)
Heptachlor	76-44-8	4.00e-04 (9)	4.00e-02	4.00e-02	1.42e-01	1.27e+00
Heptachlor epoxide	1024-57-3	2.00e-04 (9)	2.00e-02	2.00e-02	7.04e-02	6.29e-01

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CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Hexachlorobenzene	118-74-1	1.00e-03 (9)	1.00e-01	1.00e-01	4.00e-01	3.57e+00
Hexachlorobutadiene	87-68-3	1.09e-02	1.09e+00	3.67e+00	8.21e+01	7.33e+02
Hexachlorocyclohexane, alpha	319-84-6	1.35e-05	1.35e-03	4.54e-03	1.02e-01	9.08e-01
Hexachlorocyclohexane, beta	319-85-7	4.73e-04	4.73e-02	1.59e-01	3.56e+00	3.18e+01
Hexachlorocyclohexane, gama	58-89-9	2.00e-04 (9)	2.00e-02	2.00e-02	8.23e+01	6.13e+02
Hexachloroethane	67-72-1	6.08e-02	6.08e+00	2.04e+01	4.57e+02	4.09e+03
Isobutyl alcohol	78-83-13	1.10e+01	1.10e+03	3.07e+03	8.23e+04	6.13e+05
Lead (inorganic)	7439-92-1	1.50e-02 (9)	1.50e+00	1.50e+00	5.00e+02 (14)	1.00e+03 (14)
Mercury	7439-97-6	2.00e-03 (9)	2.00e-01	2.00e-01	8.23e+01	6.13e+02
Methomyl	16752-77-5	9.13e-01	9.13e+01	2.56e+02	6.86e+03	5.11e+04
Methoxy ethanol	109-86-4	1.46e-01	1.46e+01	4.09e+01	1.10e+03	8.18e+03
Methoxychlor	72-43-5	4.00e-02 (9)	4.00e+00	4.00e+00	1.37e+03	1.02e+04
Methoxyethanol acetate	110-49-6	7.30e-02	7.30e+00	2.04e+01	5.49e+02	4.09e+03
Methyl Ethyl Ketone	78-93-3	1.83e+00	1.83e+02	5.11e+02	7.58e+03 (13)	1.40e+04 (13)
Methyl isobutyl ketone	108-10-1	1.83e+00	1.83e+02	5.11e+02	1.37e+04	1.02e+05
Methyl methacrylate	80-62-6	2.92e+00	2.92e+02	8.18e+02	6.74e+02 (13)	6.63e+02 (13)
Methylene Chloride	75-09-2	5.00e-03 (9)	5.00e-01	5.00e-01	1.07e+01 (13)	1.38e+01 (13)
Naphthalene	91-20-3	1.46e+00	1.46e+02	4.09e+02	4.91e+03 (13)	7.72e+03 (13)
Nickel	7440-02-0	1.00e-01 (9)	1.00e+01	1.00e+01	1.56e+03 (12)	2.04e+04 (12)
Nitrate	14797-55-8	1.00e+01 (9)	1.00e+03	1.00e+03	4.39e+05	NHHB (16)
Nitrite	14797-65-0	1.00e+00 (9)	1.00e+02	1.00e+02	2.74e+04	2.04e+05
Nitrobenzene	98-95-3	1.83e-02	1.83e+00	5.11e+00	6.48e+01 (13)	1.06e+02 (13)
Nitroso-methyl-ethyl-amine, n-	10595-95-6	3.87e-06	3.87e-04	1.30e-03	2.91e-02	2.60e-01

CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
Nitrosodi-n-propylamine, n-	621-64-7	1.22e-05	1.22e-03	4.09e-03	9.15e-02	8.17e-01
Nitrosodiethylamine, n-	55-18-5	5.68e-07	5.68e-05	1.91e-04	4.27e-03	3.81e-02
Nitrosodimethylamine, n-	62-75-9	1.67e-06	1.67e-04	5.61e-04	1.26e-02	1.12e-01
Nitrosopryolidine, n-	930-55-2	4.06e-05	4.06e-03	1.36e-02	3.05e-01	2.72e+00
Pentachloronitrobenzene	82-68-8	3.28e-03	3.28e-01	1.10e+00	2.46e+01	2.20e+02
Pentachlorophenol	87-86-5	1.00e-03 (9)	1.00e-01	1.00e-01	5.34e+00	4.77e+01
Phenol	108-95-2	2.19e+01	2.19e+03	6.13e+03	1.65e+05	NHHB (16)
Phthalic anhydride	85-44-9	7.30e+01	7.30e+03	2.04e+04	5.49e+05	NHHB (16)
Polychlorinated biphenyls	1336-36-3	5.00e-04 (9)	5.00e-02	5.00e-02	1.00e+01 (15)	2.50e+01 (15)
Pronamide	23950-58-5	2.74e+00	2.74e+02	7.67e+02	2.06e+04	1.53e+05
Pyrene	129-00-0	1.10e+00	1.10e+02	3.10e+02	8.20e+03	6.10e+04
Pyridine	110-86-1	3.65e-02	3.65e+00	1.02e+01	2.74e+02	2.04e+03
Selenium	7782-49-2	5.00e-02 (9)	5.00e+00	5.00e+00	1.37e+03	1.02e+04
Silver	7440-22-4	1.83e-01	1.83e+01	5.11e+01	1.37e+03	1.02e+04
Strychnine	57-24-9	1.10e-02	1.10e+00	3.07e+00	8.23e+01	6.13e+02
Styrene	100-42-5	1.00e-01 (9)	1.00e+01	1.00e+01	2.13e+01	1.91e+02
Tetrachlorobenzene, 1,2,4,5-	95-94-3	1.10e-02	1.10e+00	3.07e+00	8.23e+01	6.13e+02
Tetrachloroethane (1,1,1,2)	630-20-6	3.28e-02	3.28e+00	1.10e+01	4.59e+01 (13)	6.29e+01 (13)
Tetrachloroethane (1,1,2,2)	79-34-5	4.26e-03	4.26e-01	1.43e+00	8.00e+00 (13)	1.17e+01 (13)
Tetrachloroethylene	127-18-4	5.00e-03 (9)	5.00e-01	5.00e-01	7.93e+01 (13)	2.07e+02 (13)
Tetrachlorophenol, 2,3,4,6-	58-90-2	1.10e+00	1.10e+02	3.07e+02	8.23e+03	6.13e+04
Tetraethyl dithiopyrophosphate	3689-24-5	1.83e-02	1.83e+00	5.11e+00	1.37e+02	1.02e+03
Toluene	108-88-3	1.00e+00 (9)	1.00e+02	1.00e+02	3.58e+03 (13)	3.63e+03 (13)
Toxaphene	8001-35-2	3.00e-03 (9)	3.00e-01	3.00e-01	5.82e-01	5.20e+00

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CONSTITUENT	CAS #	GW (1-4)	GWP-Res (1,5)	GWP-Ind (1,6)	SAI-Res (1,7,10,11)	SAI-Ind (1,8,10,11)
TP Silvex, 2,4,5-	93-72-1	5.00e-02 (9)	5.00e+00	5.00e+00	2.20e+03	1.64e+04
Trichlorobenzene (1,2,4)	120-82-1	7.00e-02 (9)	7.00e+00	7.00e+00	6.78e+02 (13)	8.28e+02 (13)
Trichloroethane (1,1,1)	71-55-6	2.00e-01 (9)	2.00e+01	2.00e+01	9.63e+03 (13)	1.40e+04 (13)
Trichloroethane (1,1,2)	79-00-5	5.00e-03 (9)	5.00e-01	5.00e-01	1.27e+01 (13)	1.62e+01 (13)
Trichloroethylene	79-01-6	5.00e-03 (9)	5.00e-01	5.00e-01	2.40e+00 (13)	2.85e+00 (13)
Trichlorofluoromethane	75-69-4	1.10e+01	1.10e+03	3.07e+03	8.73e+00 (13)	8.36e+00 (13)
Trichlorophenol (2,4,5)	95-95-4	3.65e+00	3.65e+02	1.02e+03	8.08e+03 (13)	1.04e+04 (13)
Trichlorophenol, 2,4,6-	88-06-2	7.74e-03	7.74e-01	2.60e+00	5.82e+01	5.20e+02
Trichlorophenoxyacetic acid, 2,4,5-	93-76-5	3.65e-01	3.65e+01	1.02e+02	2.74e+03	2.04e+04
Trichloropropane, 1,1,2-	598-77-6	1.83e-01	1.83e+01	5.11e+01	1.37e+03	1.02e+04
Trichloropropane, 1,2,3-	96-18-4	2.19e-01	2.19e+01	6.13e+01	1.65e+03	1.23e+04
Trinitrobenzene, 1,3,5-	99-35-4	1.83e-03	1.83e-01	5.11e-01	1.37e+01	1.02e+02
Vinyl acetate	108-05-4	3.65e+01	3.65e+03	1.02e+04	2.74e+05	2.04e+06
Vinyl Chloride	75-01-4	2.00e-03 (9)	2.00e-01	2.00e-01	1.99e-02 (13)	2.41e-02 (13)
Xylene	1330-20-7	1.00e+01 (9)	1.00e+03	1.00e+03	5.47e+03 (13)	5.80e+03 (13)

(1) Concentrations for constituents are expressed in scientific notation. Examples $2.20\text{E}-00 = 2.2$; $2.20\text{E}+02 = 220$; and $2.20\text{E}-01 = 0.22$.

(2) The development of final cleanup levels may involve other factors as described in this subchapter, such as cumulative health effects, that are not considered in this chapter.

(3) Ground-water concentrations are based on Maximum Contaminant Levels (MCLs) or the formula and parameters for residential use of ground water which are contained in 31 TAC §335.567 (relating to Appendix I). For non-residential exposure conditions, the ground water concentrations are calculated using the procedures of §335.559(d)(2) or (3).

(4) For some constituents, the Practical Quantitation Limit (PQL) may be the appropriate Ground Water MSC as described in 31 TAC 335.555(d)(1) of this rule. See 40 Code of Federal Regulations Part 264 (Appendix IX) for a list of ground-water PQLs.

(5) Residential soil ground-water protection concentrations are based on a multiplication factor of 100 times the ground-water MSC.

(6) Industrial soil ground-water protection concentrations are based on a multiplication factor of 100 times the MCL or, when an MCL is not available, a factor of 100 times the ground-water concentration calculated using the formula and parameters which are contained in 31 TAC §335.559(d)(2) or (3) of this title.

(7) Residential soil concentrations (maximum) are calculated using the formula and parameters for residential land use which are contained in §335.567 of this title (relating to Appendix I). The person must also demonstrate that ground water is protected and that no nuisance conditions exist (31 TAC §335.559(a)-(h) of this title).

(8) Industrial soil concentrations (maximum) are calculated using the formula and parameters for industrial land use which are contained in 31 TAC §335.567 of this title (relating to Appendix I). The person must also demonstrate that ground water is protected and that no nuisance conditions exist (31 TAC §335.559(a)-(h) of this title).

(9) The final, proposed or listed Maximum Contaminant Level (MCL), from Section 141 of the Federal Safe Drinking Water Act. For lead, the Action Level for lead in drinking water is used as the MSC.

(10) All concentrations were calculated using data from the Integrated Risk Information System (IRIS) Chemical Files, or data from the Health Effects Assessment Summary Tables (HEAST), developed by the United States Environmental Protection Agency, Office of Research and Development and Office of Health and Environmental Assessment, Washington, D.C. 20460. The toxicity information, and the MSCs, will be updated as new information becomes available.

(11) In some cases, an oral Reference Dose (RFD) or an oral Slope Factor (SF) was substituted for the inhalation RFD or inhalation SF in calculating MSC. This MSC will be updated when this information becomes available.

(12) The MSCs calculated for this compound are based on noncarcinogenic effects. The following formula was used for calculating the soil MSCs: $MSC = [(oral\ RFD)(Body\ Weight)(ED)(365\ days/yr)] / [(EF)(ED)(IR)(CF)]$. For residential soils, the following exposure factors were used: BW = 15 Kg; ED = 5 years; EF = 350 days/year; IR = 200 mg/day. For industrial soils, the following exposure factors were used: BW = 70 Kg; ED = 25 years; EF = 250 days/year; IR = 100 mg/day. In both cases, the CF is 0.000001 kg/mg. When oral slope factors become available, these MSCs will be revised.

(13) As described in 31 TAC §335.559(e) of this title, the sum of concentrations of the volatile organic compounds in vapor phase in soil shall not exceed 1,000 ppm by weight or volume.

(14) The MSC for lead in soil is based on values calculated by the United States EPA using the Lead Uptake/Biokinetic Model, Version 0.4, which has been developed by the United States EPA Office of Health & Environmental Assessment.

(15) Soil MSCs for polychlorinated biphenyls are based upon the 4/2/87 TSCA regulations, 40 Code of Federal Regulation 761.125 (see 52 FR 10688).

(16) NHHB = Not Human Health Based. The SAI-Ind MSC for this compound exceeds $10e+6$ ppm, which means it is not toxic to humans when exposed to soils under these assumptions. Persons must consider other criteria of 31 TAC §335.559 of this title (relating to Medium Specific Requirements and Adjustments for Risk Reduction Standards Number 2.) to develop numeric cleanup values.

§335.569. Appendix III.

MODEL DEED CERTIFICATION LANGUAGE

STATE OF TEXAS
(_____) COUNTY

INDUSTRIAL SOLID WASTE
CERTIFICATION OF REMEDIATION

KNOW ALL MEN BY THESE PRESENTS THAT:

Pursuant to the Rules of the Texas Water Commission pertaining to Industrial Solid Waste Management, this document is hereby filed in the Deed Records of _____ County, Texas in compliance with the recordation requirements of said rules:

I

(Company Name) has performed a remediation of the land described herein. A copy of the Notice of Registration (No.), including a description of the facility, is attached hereto and is made part of this filing. A list of the known waste constituents, including known concentrations (i.e., soil and ground water, if applicable), which have been left in place is attached hereto and is made part of this filing. Further information concerning this matter may be found by an examination of company records or in the Notice of Registration (No.) files, which are available for inspection upon request at the central office of the Texas Water Commission in Austin, Texas.

The Texas Water Commission derives its authority to review the remediation of this tract of land from the Texas Solid Waste Disposal Act, §361.002, Texas Health and Safety Code, Chapter 361, which enables the Texas Water Commission to promulgate closure and remediation standards to safeguard the health, welfare and physical property of the people of the State and to protect the environment by controlling the management of solid waste. In addition, pursuant to the Texas Water Code, §5.012 and §5.013, Texas Water Code, Annotated, Chapter 5, the Texas Water Commission is given primary responsibility for implementing the laws of the State of Texas relating to water and shall adopt any rules necessary to carry out its powers and duties under the Texas Water Code. In accordance with this authority, the Texas Water Commission requires certain persons to provide certification and/or recordation in the real property records to notify the public of the conditions of the land and/or the occurrence of remediation. This deed certification is not a representation or warranty by the Texas Water Commission of the suitability of this land for any purpose, nor does it constitute any guarantee by the Texas Water Commission that the remediation standards specified in this certification have been met by (Company name).

II

Being a ____ acre tract, more or less, out of the (Company Name)'s ____ acre tract in the (Name) League (No.), Abstract (No.), recorded in Volume (No.), Page (No.) of the Deed of Records _____ County, Texas, said ____ acre tract being more particularly described as follows:

(Insert metes and bounds description here)

For Standard 2 cleanups: (Contaminants/contaminants and waste) deposited hereon have been remediated (to meet residential soil criteria/ to meet non-residential (i.e., industrial/commercial) soil criteria)), in accordance with a plan designed to meet the Texas Water Commission's requirements in 31 Texas Administrative Code, §335.555), which mandates that the remedy be designed to eliminate substantial present and future risk such that no post-closure care or engineering or institutional control measures are required to protect human health and the environment. Future land use is considered suitable for (residential, non-residential (i.e., industrial/commercial)) purposes in accordance with risk reduction standards applicable at the time of this filing. Future land use is intended to be (residential, non-residential).

For Standard 3 cleanups: (Contaminants/contaminants and waste) deposited hereon have been remediated (to meet residential soil criteria/to meet non-residential (i.e., industrial/commercial) soil criteria) in accordance with a plan designed to meet the requirements of 31 Texas Administrative Code, §335.561 (Risk Reduction Standard Number 3), which mandates that the remedy be designed to eliminate or reduce to the maximum extent practicable, substantial present or future risk. The remediation plan (does/ does not) require continued post-closure care or engineering or institutional control measures. Future use of the property is considered appropriate for (describe) in accordance with risk reduction standards applicable at the time of this filing. Institutional or legal controls placed on the property to ensure appropriate future use include (describe).

For both Standard 2 and 3 cleanups where the remedy is based upon non-residential soil criteria: The current or future owner must undertake actions as necessary to protect human health or the environment in accordance with the rules of the Texas Water Commission.

III

The owner of the site is (Company Name), a Texas corporation, and its address is (P.O. Box or Street), (City), Texas (Zip Code), where more specific information may be obtained from the (plant manager, owner).

EXECUTED this the ____ day of _____, 19__.

(Company Name)
a Texas corporation

(Name)
Plant Manager

STATE OF TEXAS
(_____) COUNTY

BEFORE ME, on this the ____ day of _____, personally appeared (Name), (Plant Manager, Owner) of (Company Name), a Texas corporation, known to me to be the person and agent of said corporation whose name is subscribed to the foregoing instrument, and he acknowledged to me that he executed the same for the purposes and in the capacity therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this the ____ day of _____, 19__.

Notary Public in and
for the State of Texas,
County of

My Commission Expires

(END OF APPENDIX III)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
841 Chestnut Street
Philadelphia, Pennsylvania 19107

SUBJECT: Risk-Based Concentration Table, January-June 1996

FROM: Roy L. Smith, Ph.D.
Office of RCRA
Technical & Program Support Branch (3HW70)

TO: RBC Table mailing list

Attached is the EPA Region III risk-based concentration (RBC) table, which we distribute semiannually to all interested parties.

IMPORTANT MESSAGE

EPA Region III's Internet website now includes two versions of the RBC Table. (These can be found at <http://www.epa.gov/reg3hwmd/riskmenu.htm?=&Risk+Guidance>. Once there, I suggest you set a bookmark to ease future access.) One version can be browsed on-line, and a second (identical) version in .ZIP format can be quickly downloaded. The cover memo and background information are also included in both formats.

We strongly encourage all RBC table users having Internet access to obtain the table electronically rather than on paper. In this way, users can access the most current RBC table immediately in a form that can be used directly for comparisons with data or risk estimates. This distribution method will also save hundreds of pounds of paper per year and cost substantially less.

CONTENTS, USES, AND LIMITATIONS OF THE RBC TABLE

The table contains reference doses and carcinogenic potency slopes (obtained from IRIS through April 1, 1996, HEAST through May 1995, the EPA-NCEA Superfund Health Risk Technical Support Center, and other EPA sources) for nearly 600 chemicals. These toxicity constants have been combined with "standard" exposure scenarios to calculate RBCs--chemical concentrations corresponding to fixed levels of risk (i.e., a hazard quotient of one, or lifetime cancer risk of 10^{-6} , whichever occurs at a lower concentration) in water, air, fish tissue, and soil.

The RBC table also includes soil screening levels (SSLs) for protection of groundwater and air. Most SSLs were obtained directly from EPA/OSWER's proposed SSL guidance document, to which we have added some additional SSLs based on the same methodology. Sources of SSLs are noted in the table. SSLs incorporate the same exposure assumptions as RBCs, plus additional

assumptions needed for inter-media extrapolation. SSLs are therefore distinct from RBCs, and should be used only in the framework proposed in the OSWER document (available from NTIS as document numbers 9355.4-1, PB95-965530, or EPA540/R-94/105).

The Region III toxicologists use RBCs to screen sites not yet on the NPL, respond rapidly to citizen inquiries, and spot-check formal baseline risk assessments. The background materials provide the complete basis for all the calculations, with the intent of showing users exactly how the RBCs were developed. Simply put, RBCs are risk assessments run in reverse. For a single contaminant in a single medium, under standard default exposure assumptions, the RBC corresponds to the target risk or hazard quotient.

RBCs also have several important limitations. Specifically excluded from consideration are (1) transfers from soil to air and groundwater, and (2) cumulative risk from multiple contaminants or media. Also, the toxicity information in the table has been assembled by hand, and (despite extensive checking and years of use) may contain errors. It's advisable to cross-check before relying on any RfDs or CPSs in the table. If you find any errors, please send me a note.

Many users want to know if the risk-based concentrations can be used as valid no-action levels or cleanup levels, especially for soils. The answer is a bit complex. First, it is important to realize that the RBC table does not constitute regulation or guidance, and should not be viewed as a substitute for a site-specific risk assessment. For sites where:

1. A single medium is contaminated;
2. A single contaminant contributes nearly all of the health risk;
3. Volatilization or leaching of that contaminant from soil is expected not to be significant;
4. The exposure scenarios used in the RBC table are appropriate for the site;
5. The fixed risk levels used in the RBC table are appropriate for the site; and
6. Risk to ecological receptors is expected not to be significant;

the risk-based concentrations would probably be protective as no-action levels or cleanup goals. However, to the extent that a site deviates from this description, as most do, the RBCs would not necessarily be appropriate.

To summarize, the table should generally not be used to (1) set cleanup or no-action levels at CERCLA sites or RCRA Corrective Action sites, (2) substitute for EPA guidance for preparing baseline risk assessments, or (3) determine if a waste is hazardous under RCRA.

ANSWERS TO FREQUENTLY ASKED QUESTIONS

To help you better understand the RBC table, here are answers to our most often-asked questions:

1. How can the age-adjusted inhalation factor (11.66) be less than the inhalation rate for either a child (12) or an adult (20)?

Age-adjusted factors are not intake rates, but rather partial calculations which have different units than intake rates do. The fact that these partial calculations have values similar to intake rates is really coincidental, an artifact of the similar magnitude of years of exposure and time-averaged body weight.

2. Why does arsenic appear in the RBC table separately as a carcinogen and a non-carcinogen, while other contaminants do not?

Arsenic is double-entered to ensure that the risk assessor realizes that non-carcinogenic concerns are significant for arsenic. Otherwise, one might be tempted to accept a $1e-4$ risk (43 ppm in residential soil), when the oral reference dose would be exceeded at 23 ppm.

Also, EPA has a little-known risk management policy for arsenic (dating from 1988) that suggests that arsenic-related cancer risks of up to $1e-3$ can be accepted because the cancers are squamous cell carcinomas with a low mortality rate. Thus, non-carcinogenic RBCs represent an important limitation on acceptable arsenic concentrations.

3. Many contaminants have no inhaled reference dose or carcinogenic potency slope in IRIS, yet these numbers appear in the RBC table with IRIS given as the source. Where did the numbers come from?

Most inhaled reference doses and potency slopes in the RBC table are converted from reference concentrations and unit risk values which do appear in IRIS. These conversions assume 70-kg persons inhaling $20 \text{ m}^3/\text{d}$. For example, the inhalation unit risk for arsenic ($4.3e-3$ risk per $\mu\text{g}/\text{m}^3$) is divided by $20 \text{ m}^3/\text{d}$ and multiplied by 70 kg times 1000 $\mu\text{g}/\text{mg}$, yielding a CPSi of 15.1 risk per $\text{mg}/\text{kg}/\text{d}$.

4. Why does the RBC table base soil RBCs for cadmium and manganese on reference doses that apply only to drinking water?

The RBC table's use of the drinking water RfDs for cadmium and manganese reflects (1) the limited space available in the already-crowded table, and (2) the intended use of the table as a screening tool rather than a source of cleanup levels (thereby making false positives acceptable). For a formal risk assessment, Region III would use the food RfDs for soil ingestion.

At this time, only two substances (as far as we know) have distinct oral RfDs for water and food--cadmium and manganese. Adding the two food RfDs to the table would require an entire column, which would be about 99.9% blank. The table has become so crowded that it

would be difficult to accommodate another column. Also, we've given this problem a relatively low priority because the table's primary purpose is to identify environmental problems needing further study. RBCs were never intended for uncritical use as cleanup levels, merely to identify potential problems which need a closer look.

5. *What is the source of the child's inhalation rate of 12 m3/d?*

The calculation comes from basic physiology. It's a scaling of the mass-specific 20 m3/d rate for adults from a body mass of 70 kg to 15 kg, using the two-thirds power of mass, as follows:

$$\begin{array}{lll} \text{Let: } \text{IRcm} & = & \text{mass-specific child inhalation rate (m3/kg/d)} \\ \text{IRc} & = & \text{child inhalation rate (m3/d)} \end{array}$$

$$20 \text{ m3/d} \div 70\text{kg} = 0.286 \text{ m3/kg/d (mass-specific adult inhalation rate)}$$

$$0.286 \text{ m3/kg/d} \times (70^{.67}) = (\text{IRcm}) \times (15^{.67})$$

$$\text{IRcm} = (0.286) \times (70^{.67}) \div (15^{.67}) = 0.286 \times 2.807 = 0.803 \text{ m3/kg/d}$$

$$\text{IRc} = \text{IRcm} \times 15\text{kg} = 0.803 \text{ m3/kg/d} \times 15\text{kg} = 12.04 \text{ m3/d}$$

A short (but algebraically equivalent) way to do the conversion:

$$20 \times (15 \div 70)^{.333} = 11.97 \text{ (different from, but actually more correct than, 12.04 because of rounding error in calculating by the long form).}$$

6. *Can the oral RfDs in the RBC table be applied to dermal exposure?*

Not directly. EPA's Office of Research and Development is working on dermal RfDs for some substances, but has not yet produced any final values. When dermal RfDs do appear, they will undoubtedly be based on absorbed dose rather than administered dose. Oral RfDs are (usually) based on administered dose and therefore tacitly include a GI absorption factor. Thus, any use of oral RfDs in dermal risk calculations would have to involve removing this absorption factor.

7. *The exposure variables table in the RBC background document lists the averaging time for non-carcinogens as "ED*365". What does that mean?*

ED is exposure duration, in years, and '*' is the computer-ese symbol for multiplication. Multiplying ED by 365 simply converts the duration to days. In fact, the ED term is included in both the numerator and denominator of the RBC algorithms for non-cancer risk, canceling it altogether. We expressed the algorithm this way to allow users to realize this. The total exposure is really adjusted only by EF (days exposed per year) divided by 365. (Note that this explanation applies to non-carcinogenic risk only; for carcinogens, exposure is pro-rated over the number of days in a 70-year life span.)

8. *Why is inorganic lead not included in the RBC table?*

The reason that lead is missing from the RBC table is simple, and fundamental: EPA has no reference dose or potency slope for inorganic lead, so it wasn't possible to calculate risk-based concentrations. EPA considers lead a special case because:

- (1) Lead is ubiquitous in all media, so human exposure comes from multiple sources. Comparing single-medium exposures with a reference dose would be misleading.
- (2) If EPA did develop a reference dose for lead by the same methods other reference doses, we would probably find that most people already exceed it. Since EPA already knows this and is moving aggressively to lower lead releases nationally, such findings at individual sites would be irrelevant and unduly alarming.
- (3) EPA decided to take a new approach to distinguish important lead exposures from trivial ones. EPA developed a computer model (the IEUBK model) which predicts children's blood lead concentrations using lead levels in various media as inputs. The idea is to evaluate a child's entire environment, and reduce lead exposures in the most cost-effective way.

On the practical side, there are several EPA policies on lead which effectively substitute for RBCs. The EPA Office of Solid Waste has released a detailed directive on risk assessment and cleanup of residential soil lead. The directive recommends that soil lead levels less than 400 ppm be considered safe for residential use. Above that level, the document suggests collecting certain types of data and modeling children's blood lead with the IEUBK model. For the purpose of the RBC table, the *de facto* residential soil number would be 400 mg/kg. For water, we suggest 15 ppb (from the national EPA Action Level), and for air, the National Ambient Air Quality Standard.

9. *Where did the potency slopes for carcinogenic PAHs come from?*

The source of the potency slopes for PAHs is "Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons," Final Draft, EPA Environmental Criteria and Assessment Office, Cincinnati, OH. It's available from NTIS as document number ECAO-CIN-842 (March, 1993). The slopes are expressed in terms of order-of-magnitude equivalence factors relating the compounds to benzo[a]pyrene; we have converted these TEQs to potency slopes to fit the format of the table.

10. *May I please have a copy of the January 1991 RBC table?*

We're sorry, but no. The RBC table doesn't represent regulation or guidance, so past issues have no legal importance. Each time we update the table we destroy all obsolete copies, electronic and paper. We do this to ensure that only one set of RBCs, the one based on current information, exists at any time.

11. *I've noticed that some soil RBCs are one million parts per million. Since some of these*

substances are liquids, that's obviously ridiculous. What is that basis for these calculations?

A soil RBC of one million parts per million means that no amount of the contaminant in soil will cause a receptor to exceed the oral reference dose by incidental ingestion of soil. In fact, some contaminants would have RBCs of more than one million ppm, but the algorithms cap concentrations at 100%. The reason we retain these admittedly impossible numbers is to let users see that the contaminant is not a threat via soil ingestion.

However, it's important to realize that the RBC calculations do not consider the potential of soil contaminants to leach to groundwater or escape to air by volatilization or dust entrainment. To consider these inter-media transfers, it's necessary to either monitor air and groundwater, or to use a mathematical model. Measured or modeled air and groundwater concentrations should then be compared to the RBCs for air and tap water.

We have begun to incorporate inter-media transfers into the RBC table in the form of soil screening levels (SSLs). However, EPA Headquarters has proposed only about a hundred SSLs so far, so the list is still rather short.

12. Please elaborate on the meaning of the 'W' source code in the table.

The "W" code means that a reference dose or potency slope for a contaminant is currently not present on either IRIS or HEAST, but that it once was present on either IRIS or HEAST and was removed. Such withdrawal usually indicates that consensus on the number no longer exists among EPA scientists, but not that EPA believes the contaminant to be unimportant. Older versions of the RBC table had separate codes for IRIS and HEAST withdrawals, but we changed to a single code for both because, after all, it hardly matters.

We retain withdrawn numbers in the table because we still need to deal with these contaminants during the sometimes very long delays before replacement numbers are ready. We take the position that for the purpose of screening an obsolete RBC is better than none at all. The 'W' code should serve as a clear warning that before making any serious decision involving that contaminant you will need to develop an interim value based on current scientific understanding.

If you are assessing risks at a site where a major contaminant is coded "W," consider working with your Regional EPA risk assessor to develop a current toxicity constant. If the site is being studied under CERCLA, the EPA-NCEA Regional Technical Support group may be able to assist.

13. Can I get copies of supporting documents for interim toxicity constants which are coded "E" in the RBC table?

Unfortunately, Region 3 does not have a complete set of supporting documents. The EPA-NCEA Superfund Health Risk Technical Support Center prepares these interim toxicity constants in response to site-specific requests from Regional risk assessors, and sends the documentation only to the requestor. The RBC tables contain only the interim values (those with "E" codes) that we've either requested ourselves or otherwise obtained copies of. There may be many more

interim values of which we are unaware. Also, we don't receive automatic updates when NCEA revisits a contaminant, so it's likely that some interim values in the RBC table are obsolete.

It has been NCEA's policy to deny requests for documentation of interim toxicity constants. Although Region 3 has sometimes provided this documentation on request, for the above-stated reasons we have no assurance that the assessments, or even the interim numbers, are current. We've decided to discontinue distributing information that may be misleading. If an "E"-coded contaminant is a major risk contributor at your site, we strongly suggest that you work with EPA to develop an up-to-date reference dose or slope factor.

CHANGES IN THIS ISSUE OF THE RBC TABLE

New or revised EPA toxicity constants are now marked with "***" before the contaminant name. This is to help users quickly pick out substances with new RBCs. Formerly these contaminants were printed in underlined boldface type that copied badly. A new basis code, "M" for MCL, has been added to the upper right corner of each page. This code denotes soil screening levels for groundwater protection that are based on EPA Maximum Contaminant Levels.

If you want to raise issues or get answers to questions about the RBC table, please call the Technical Support Help Line at 215-597-1116. The line has a voice mail system to take your calls if we're not available. We'll return your call as soon as we can. Please limit calls to RBC issues; if you have a question about applying RBCs to a site, please call the EPA Regional office handling the project. Thanks for your help and cooperation, and we hope the RBC table continues to be a useful resource.

Attachment

EPA Region III Risk-Based Concentration Table

Background Information

Roy L. Smith, Ph.D.
Toxicologist

Development of Risk-Based Concentrations

General

Separate carcinogenic and non-carcinogenic risk-based concentrations were calculated for each compound for each pathway. The concentration in the table is the lower of the two, rounded to two significant figures. The following terms and values were used in the calculations:

Exposure variables	Value	Symbol
<i>General:</i>		
Carcinogenic potency slope oral (risk per mg/kg/d):	*	CPSo
Carcinogenic potency slope inhaled (risk per mg/kg/d):	*	CPSi
Reference dose oral (mg/kg/d):	*	RfDo
Reference dose inhaled (mg/kg/d):	*	RfDi
Target cancer risk:	1e-06	TR
Target hazard quotient:	1	THQ
Body weight, adult (kg):	70	BWa
Body weight, age 1-6 (kg):	15	BWc
Averaging time carcinogens (d):	25550	ATc
Averaging time non-carcinogens (d):	ED*365	ATn
Inhalation, adult (m3/d):	20	IRAA
Inhalation, child (m3/d):	12	IRAc
Inhalation factor, age-adjusted (m3-y/kg-d):	11.66	IFAadj
Tap water ingestion, adult (L/d):	2	IRWa
Tap water ingestion, age 1-6 (L/d):	1	IRWc
Tap water ingestion factor, age-adjusted (L-y/kg-d):	1.09	IFWadj
Fish ingestion (g/d):	54	IRF
Soil ingestion, adult (mg/d):	100	IRSa
Soil ingestion, age 1-6 (mg/d):	200	IRSc
Soil ingestion factor, age adjusted (mg-y/kg-d):	114.29	IFSadj
<i>Residential:</i>		
Exposure frequency (d/y):	350	EFr
Exposure duration, total (y):	30	EDtot
Exposure duration, age 1-6 (y):	6	EDc
Volatilization factor (L/m3):	0.5	K

Exposure variables	Value	Symbol
<i>Occupational:</i>		
Exposure frequency (d/y):	250	EFo
Exposure duration (y):	25	EDo
Fraction of contaminated soil ingested (unitless)	0.5	FC

*: Contaminant-specific toxicological constants. The priority among sources of toxicological constants was as follows: (1) IRIS, (2) HEAST, (3) HEAST alternative method, (4) EPA-NCEA Superfund Health Risk Technical Support Center, (5) withdrawn from IRIS or HEAST, and (6) other EPA documents. Each source was used only if numbers from higher-priority sources were unavailable. The EPA Superfund Health Risk Technical Support Center, part of the EPA National Center for Environmental Assessment in Cincinnati, develops provisional RfDs and CPSS on request for contaminants not in IRIS or HEAST. These provisional values are labeled "E = EPA-NCEA provisional" in the table. It is possible they may be obsolete. If one of the "E" constants is important to a Superfund risk assessment, consider requesting, through a Regional risk assessor, a new provisional value.

Age-adjusted factors

Because contact rates with tap water, ambient air, and residential soil are different for children and adults, carcinogenic risks during the first 30 years of life were calculated using age-adjusted factors. These factors approximated the integrated exposure from birth until age 30 by combining contact rates, body weights, and exposure durations for two age groups - small children and adults. The age-adjusted factor for soil was obtained from RAGS IB; the others were developed by analogy.

Air inhalation

$$IFAadj \frac{m^3}{kg \cdot d} = \frac{EDC}{BWC} \frac{IRAc}{(ED_{tot} EDC)} \frac{IRa_a}{BW_a}$$

Tap water ingestion

$$IFWadj \frac{L}{kg \cdot d} = \frac{EDC}{BWC} \frac{IRWc}{(ED_{tot} EDC)} \frac{IRWa}{BW_a}$$

Soil ingestion

$$IFSadj \frac{mg}{kg \cdot d} = \frac{EDC}{BWC} \frac{IRSc}{(ED_{tot} EDC)} \frac{IRSa}{BW_a}$$

Residential water

Volatilization terms were calculated only for compounds with a mark in the "VOC" column. Compounds having a Henry's Law constant greater than 10^{-5} were considered volatile. The list may be incomplete, but is unlikely to include false positives. The equations and the volatilization factor (K, above) were obtained from RAGS IB. Oral potency slopes and reference doses were used for both oral and inhaled exposures for volatile compounds lacking inhalation values. Inhaled potency slopes were substituted for unavailable oral potency slopes only for volatile

compounds; inhaled RfDs were substituted for unavailable oral RfDs for both volatile and non-volatile compounds. RBCs for carcinogens were based on combined childhood and adult exposure; for non-carcinogens RBCs were based on adult exposure.

Carcinogens

$$RBC \frac{\mu g}{L} = \frac{TR \quad ATc \quad 1000 \frac{\mu g}{mg}}{EFr \quad ([K \quad IFAadj \quad CPSi] \quad [IFWadj \quad CPSo])}$$

Non-carcinogens

$$RBC \frac{\mu g}{L} = \frac{THQ \quad BWa \quad ATn \quad 1000 \frac{\mu g}{mg}}{EFr \quad EDtot \quad \left(\frac{K \quad IRAa}{RfDi} \quad \frac{IRWa}{RfDo} \right)}$$

Ambient air

Oral potency slopes and references were used where inhalation values were not available. RBCs for carcinogens were based on combined childhood and adult exposure; for non-carcinogens RBCs were based on adult exposure.

Carcinogens

$$RBC \frac{\mu g}{m^3} = \frac{TR \quad ATc \quad 1000 \frac{\mu g}{mg}}{EFr \quad IFAadj \quad CPSi}$$

Non-carcinogens

$$RBC \frac{\mu g}{m^3} = \frac{THQ \quad RfDi \quad BWa \quad ATn \quad 1000 \frac{\mu g}{mg}}{EFr \quad EDtot \quad IRAa}$$

Edible fish

All RBCs were based on adult exposure.

Carcinogens

$$RBC \frac{mg}{kg} = \frac{TR \quad BWa \quad ATc}{EFr \quad EDtot \quad \frac{IRF}{1000 \frac{g}{kg}} \quad CPSo}$$

Non-carcinogens

$$RBC \frac{mg}{kg} = \frac{THQ \quad RfDo \quad BWa \quad ATn}{EFr \quad EDtot \quad \frac{IRF}{1000 \frac{g}{kg}}}$$

Commercial/industrial soil ingestion

RBCs were based on adult occupational exposure, including an assumption that only 50% of total soil ingestion is work-related.

Carcinogens

$$RBC \frac{mg}{kg} = \frac{TR}{EFO} \frac{BWa}{EDo} \frac{ATc}{\frac{IRSa}{10^6 \frac{mg}{kg}}} FC CPSO$$

Non-carcinogens

$$RBC \frac{mg}{kg} = \frac{THQ}{EFO} \frac{RfDo}{EDo} \frac{BWa}{\frac{IRSa}{10^6 \frac{mg}{kg}}} ATn FC$$

Residential soil ingestion

RBCs for carcinogens were based on combined childhood and adult exposure; RBCs for non-carcinogens were based on childhood exposure only.

Carcinogens

$$RBC \frac{mg}{kg} = \frac{TR}{EFr} \frac{ATc}{\frac{IFSadj}{10^6 \frac{mg}{kg}}} CPSO$$

Non-carcinogens

$$RBC \frac{mg}{kg} = \frac{THQ}{EFr} \frac{RfDo}{EDc} \frac{BWc}{\frac{IRSc}{10^6 \frac{mg}{kg}}} ATn$$

Development of Soil Screening Levels**General**

In December 1994 the EPA Office of Solid Waste and Emergency Response proposed Soil Screening Guidance (Document 9355.4-1, PB95-963530, EPA540/R-94/101, available through NTIS at 703-487-4650). This draft document provides (1) a framework in which soil screening levels are to be used, (2) a detailed methodology for calculating soil screening levels, and (3) soil screening levels for 107 substances. (Note: EPA released an updated draft of this document in early 1996. We have decided to wait until the SSL guidance is final before changing the RBC table.)

Consistent with this new guidance, the risk-based concentration table now includes two columns of generic soil screening levels (SSLs). OSWER's 107 proposed soil screening levels have been added verbatim. In addition, the proposed SSL methodology has been used to calculate soil screening levels for more substances, which are also included in the new table. The table clearly distinguishes the OSWER SSLs from the "unofficial" ones.

These SSLs provide reasonable maximum estimates of transfers of contaminants from soil to other media. One column contains soil concentrations protective of groundwater quality; the other contains soil concentrations protective of air quality. "Protective" is defined in the same terms as the risk-based concentrations for tap water and air -- that residential contact scenarios will yield a fixed upper bound risk of 10^{-6} or a fixed hazard quotient of 1 (whichever occurs at the lower concentration).

OSWER's SSLs should be used only within the framework proposed in the guidance document. The additional SSLs included in the RBC table are intended for the same uses (although they obviously carry less weight than the formally proposed numbers).

The SSLs are based on the following assumptions:

Input variables	Value	Symbol*
Surface soil moisture content (g/g)	0.1	W_s
Vadose zone soil moisture content (kg/kg)	0.2	W_v
Surface soil bulk density (g/cm ³)	1.5	ρ_{bs}
Vadose zone soil bulk density (kg/L)	1.5	ρ_{bv}
Surface soil particle density (g/cm ³)	2.65	ρ_{ss}
Vadose zone soil particle density (g/cm ³)	2.65	ρ_{sv}
Total surface soil porosity (L pore /L soil)	0.43	N_s
Total vadose zone soil porosity (L pore/L soil)	0.43	N_v
Air-filled surface soil porosity (L air/L soil)	0.28	ρ_{as}
Water-filled surface soil porosity (L water/L soil)	0.15	ρ_{ws}
Air-filled vadose zone soil porosity (L air/L soil)	0.13	ρ_{av}
Water-filled vadose zone soil porosity (L water/L soil)	0.30	ρ_{wv}
Organic carbon fraction of surface soil (g/g)	0.006	FOC_s
Organic carbon fraction of vadose zone soil (g/g)	0.002	FOC_v
Dispersion factor for 0.5 acres (g/m ² s per kg/m ³)	35.1	Q/C
Particulate emission factor (m ³ /kg)	6.79e+08	PEF
Exposure interval (s)	9.50e+08	T
Dilution-attenuation factor (unitless)	10	DAF

*: Symbols were adjusted, variables were rearranged, and derived and chemical-specific variables were omitted for simplicity and clarity. Presentation of the input variables in a single table using the same terms as in the OSWER SSL document would have been confusing. The terms used here are generally similar to OSWER's, and can easily be compared with the SSL guidance document.

With two exceptions described in the following section, SSL calculations were based on the same algorithms presented in the OSWER draft SSL guidance document. For details of the calculations (and for general background information on SSLs), I strongly recommend consulting that document. The "unofficial" SSLs were developed under the following conditions:

Soil Screening Levels for Inhalation

Inhaled reference doses and potency slopes were used if available. If inhalation values were not available, oral RfDs and potency slopes were substituted. SSLs were calculated only for substances for which aqueous solubility, Koc, Henry's Law constant, and diffusivity in air were available. SSLs were calculated only for substances for which a volatilization factor could be calculated. This was done because OSWER's large proposed particulate emission factor rendered it pointless to estimate SSLs for particulate emissions alone. The final calculated SSL shown in the RBC table is the smaller of the risk-based SSL and the soil saturation concentration. All calculated SSLs were rounded to 2 significant figures.

The OSWER risk algorithms for inhalation were revised in order to be consistent with the rest of the RBC table. Only calculated SSLs were affected by this; SSLs proposed by OSWER are presented verbatim. Calculated SSLs for inhalation of carcinogens were based on an integrated lifetime exposure rather than adult exposure. SSLs for inhalation of noncarcinogens were based on adult exposure for 350 days per year rather than 365 days per year. The following algorithms were used to calculate inhalation SSLs:

Carcinogens

$$SSL \frac{mg}{kg} = \frac{TR}{EFr} \frac{ATc}{IFAadj} \left(\frac{1}{VF} \frac{1}{PEF} \right) CPSi$$

Non-carcinogens

$$SSL \frac{mg}{kg} = \frac{THQ}{EFr} \frac{BWa}{EDtot} \frac{ATn}{IRAa} \frac{RfDi}{\left(\frac{1}{VF} \frac{1}{PEF} \right)}$$

Soil Screening Levels for Groundwater Use

All algorithms were as proposed by OSWER. MCLs were used as target groundwater concentrations if available. If MCLs were unavailable the risk-based concentration in the "tap water" column of the RBC table was used as the target groundwater concentration. All SSLs for groundwater are based on a dilution-attenuation factor (DAF) of 10. Since these SSLs scale linearly with DAF, the SSLs for DAF=1 would be ten times lower. They were omitted to conserve space. All groundwater SSLs were rounded to 2 significant figures and capped at unity.

Sources: I=IRIS H=HEAST A=HEAST alternate W=Withdrawn from IRIS or HEAST E=EPA-NCEA Regional Support provisional value O=Other EPA documents.										Basis: C=carcinogenic effects S=soil saturation concentration E=EPA draft Soil Screening Level				N=noncarcinogenic effects M=EPA MCL.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
Contaminant	CAS	Risk-Based Concentrations										Soil Screening Levels- Transfers from Soil to:																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
		RfDo	I	RfDi	A	CPSo	I	CPSi	I	V	Tap	Ambient	Fish	Soil Ingestion			Air	Groundwater																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
		mg/kg/d		mg/kg/d		kg-d/mg		kg-d/mg		O	Water	Air		mg/kg	Industrial	Residential			mg/kg	mg/kg	mg/kg																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
										C	µg/L	µg/m3	mg/kg	mg/kg	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C

Bayleton	43121433	3.00E-02	I							1100	N	110	N	41	N	61000	N	2300	N	0	0			
Baythroid	68359375	2.50E-02	I							910	N	91	N	34	N	51000	N	2000	N	0	0			
Benefin	1861401	3.00E-01	I							11000	N	1100	N	410	N	610000	N	23000	N	0	0			
Benomyl	17804352	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	0	0			
Bentazon	25057890	2.50E-03	I							91	N	9.1	N	3.4	N	5100	N	200	N	0	0			
Benzaldehyde	100527	1.00E-01	I					x		610	N	370	N	140	N	200000	N	7800	N	0	0			
Benzene	71432			1.71E-03	E	2.90E-02	I	2.90E-02	I	x	0.36	C	0.22	C	0.11	C	200	C	0.5	E	0.02	E		
Benzenethiol	108985	1.00E-05	H							0.37	N	0.037	N	0.014	N	20	N	0.78	N	0	0			
Benzidine	92875	3.00E-03	I			2.30E+02	I	2.35E+02	I		0.00029	C	0.000027	C	0.000014	C	0.025	C	0.0028	C	1.3	C	0.0000011	C
Benzoic acid	65850	4.00E+00	I							150000	N	15000	N	5400	N	1000000	N	310000	N	320	S	280	E	
Benzotrichloride	98077					1.30E+01	I				0.0052	C	0.00048	C	0.00024	C	0.44	C	0.049	C	0.012	C	0.000073	C
Benzyl alcohol	100516	3.00E-01	H							11000	N	1100	N	410	N	610000	N	23000	N	0	0	0	0	
Benzyl chloride	100447					1.70E-01	I		x		0.062	C	0.037	C	0.019	C	34	C	3.8	C	0.5	C	0.00036	C
Beryllium and compounds	7440417	5.00E-03	I			4.30E+00	I	8.40E+00	I		0.016	C	0.00075	C	0.00073	C	1.3	C	0.15	C	690	E	180	E
Bidrin	141662	1.00E-04	I							3.7	N	0.37	N	0.14	N	200	N	7.8	N	0	0	0	0	
Biphenethrin (Talstar)	82657043	1.50E-02	I							550	N	55	N	20	N	31000	N	1200	N	0	0	0	0	
1,1-Biphenyl	92524	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	9000	S	110	N	
Bis(2-chloroethyl)ether	111444					1.10E+00	I	1.16E+00	I	x	0.0092	C	0.0054	C	0.0029	C	5.2	C	0.58	C	0.3	E	0.0003	E
Bis(2-chloroisopropyl)ether	39638329	4.00E-02	I			7.00E-02	H	3.50E-02	H	x	0.26	C	0.18	C	0.045	C	82	C	9.1	C	0	0	0	0
Bis(chloromethyl)ether	542881					2.20E+02	I	2.17E+02	I	x	0.000049	C	0.000029	C	0.000014	C	0.026	C	0.0029	C	0.000037	C	0.0000001	C
Bis(2-chloro-1-methylethyl)ether	0					7.00E-02	W	7.00E-02	W		0.96	C	0.089	C	0.045	C	82	C	9.1	C	0	0	0	0
Bis(2-ethylhexyl)phthalate (DEHP)	117817	2.00E-02	I			1.40E-02	I				4.8	C	0.45	C	0.23	C	410	C	46	C	210	E	11	E
Bisphenol A	80057	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	0	0	0	0	
Boron (and borates)	7440428	9.00E-02	I	5.71E-03	H					3300	N	21	N	120	N	180000	N	7000	N	0	0	0	0	
Boron trifluoride	7637072			2.00E-04	H					7.3	N	0.73	N	0		0		0		0	0	0	0	
Bromodichloromethane	75274	2.00E-02	I			6.20E-02	I		x		0.17	C	0.1	C	0.051	C	92	C	10	C	1800	E	0.3	E
Bromoethene	593602							1.10E-01	H	x	0.096	C	0.057	C	0		0		0		0	0	0	0
Bromoform (tribromomethane)	75252	2.00E-02	I			7.90E-03	I	3.85E-03	I	x	2.4	C	1.6	C	0.4	C	720	C	81	C	46	E	0.5	E
Bromomethane	74839	1.40E-03	I	1.43E-03	I				x		8.7	N	5.2	N	1.9	N	2900	N	110	N	2	E	0.1	E
4-Bromophenyl phenyl ether	101553	5.80E-02	O							2100	N	210	N	78	N	120000	N	4500	N	0	0	0	0	0
Bromophos	2104963	5.00E-03	H							180	N	18	N	6.8	N	10000	N	390	N	0	0	0	0	0
Bromoxynil	1689845	2.00E-02	I							730	N	73	N	27	N	41000	N	1600	N	0	0	0	0	0
Bromoxynil octanoate	1689992	2.00E-02	I							730	N	73	N	27	N	41000	N	1600	N	0	0	0	0	0
1,3-Butadiene	106990					9.80E-01	I	x		0.011	C	0.0064	C	0		0		0	0.0013	C		0.000072	C	
1-Butanol	71363	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	9700	E	8	E	
Butyl benzyl phthalate	85687	2.00E-01	I							7300	N	730	N	270	N	410000	N	16000	N	530	E	68	E	
Butylate	2008415	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	0	0	0	0	
sec-Butylbenzene	135988	1.00E-02	E					x		61	N	37	N	14	N	20000	N	780	N	80	S	0.27	M	
tert-Butylbenzene	104518	1.00E-02	E					x		61	N	37	N	14	N	20000	N	780	N	0	0	0.27	M	
Butylphthalyl butylglycolate	85701	1.00E+00	I							37000	N	3700	N	1400	N	1000000	N	78000	N	0	0	0	0	
Cacodylic acid	75605	3.00E-03	H							110	N	11	N	4.1	N	6100	N	230	N	0	0	0	0	
Cadmium and compounds	7440439	5.00E-04	I	5.71E-05	W					18	N	0.00099	C	0.68	N	1000	N	39	N	920	E	6	E	
Caprolactam	105602	5.00E-01	I							18000	N	1800	N	680	N	1000000	N	39000	N	0	0	0	0	
Captafol	2425061	2.00E-03	I			8.60E-03	H			7.8	C	0.73	C	0.37	C	670	C	74	C	0	0	0	0	
Captan	133062	1.30E-01	I			3.50E-03	H			19	C	1.8	C	0.9	C	1600	C	180	C	0	0	0	0	
Carbaryl	63252	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0.34	S	23	N	
Carbofuran	1563662	5.00E-03	I							180	N	18	N	6.8	N	10000	N	390	N	0	0	0	0	
Carbon disulfide	75150	1.00E-01	I	2.00E-01	I			x		1000	N	730	N	140	N	200000	N	7800	N	11	E	14	E	
Carbon tetrachloride	56235	7.00E-04	I	5.71E-04	E	1.30E-01	I	5.25E-02	I	x	0.16	C	0.12	C	0.024	C	44	C	4.9	C	0.2	E	0.03	E
Carbosulfan	55285148	1.00E-02	I							370	N	37	N	14	N	20000	N	780	N	0	0	0	0	
Carboxin	5234684	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0	0	0	0	
Chloral	75876	2.00E-03	I							73	N	7.3	N	2.7	N	4100	N	160	N	0	0	0	0	
Chloramben	133904	1.50E-02	I							550	N	55	N	20	N	31000	N	1200	N	0	0	0	0	
Chloranil	118752			4.03E-01	H					0.17	C	0.016	C	0.0078	C	14	C	1.6	C	0	0	0	0	

Chlordane	57749	6.00E-05	I		1.30E+00	I	1.29E+00	I	0.052	C	0.0049	C	0.0024	C	4.4	C	0.49	C	10	E	2	E
Chlorimuron-ethyl	90982324	2.00E-02	I						730	N	73	N	27	N	41000	N	1600	N	0		0	
Chlorine	7782505	1.00E-01	I						3700	N	370	N	140	N	200000	N	7800	N	0		0	
Chlorine dioxide	10049044			5.71E-05	I				2.1	N	0.21	N	0		0		0		0		0	
Chloroacetaldehyde	107200	6.90E-03	O						250	N	25	N	9.3	N	14000	N	540	N	0		0	
Chloroacetic acid	79118	2.00E-03	H						73	N	7.3	N	2.7	N	4100	N	160	N	0		0	
2-Chloroacetophenone	532274			8.57E-06	I				0.31	N	0.031	N	0		0		0		0		0	
4-Chloroaniline	106478	4.00E-03	I						150	N	15	N	5.4	N	8200	N	310	N	1200	S	0.3	E
Chlorobenzene	108907	2.00E-02	I	5.71E-03	A			x	39	N	21	N	27	N	41000	N	1600	N	94	E	0.6	E
Chlorobenzilate	510156	2.00E-02	I			2.70E-01	H	2.70E-01	H	0.25	C	0.023	C	0.012	C	21	C	0		0		
p-Chlorobenzoic acid	74113	2.00E-01	H						7300	N	730	N	270	N	410000	N	16000	N	0		0	
4-Chlorobenzotrifluoride	98566	2.00E-02	H						730	N	73	N	27	N	41000	N	1600	N	86	N	7.5	N
2-Chloro-1,3-butadiene	126998	2.00E-02	A	2.00E-03	H			x	14	N	7.3	N	27	N	41000	N	1600	N	0		0	
1-Chlorobutane	109693	4.00E-01	H					x	2400	N	1500	N	540	N	820000	N	31000	N	0		0	
Chlorodibromomethane	124481	2.00E-02	I			8.40E-02	I	x	0.13	C	0.075	C	0.038	C	68	C	7.6	C	1900	E	0.2	E
1-Chloro-1,1-difluoroethane	75683			1.43E+01	I			x	87000	N	52000	N	0		0		0		0		0	
Chlorodifluoromethane	75456			1.43E+01	I			x	87000	N	52000	N	0		0		0		0		0	
Chloroethane	75003	4.00E-01	E	2.86E+00	I			x	8600	N	10000	N	540	N	820000	N	31000	N	2600	S	33	N
2-Chloroethyl vinyl ether	110758	2.50E-02	O					x	150	N	91	N	34	N	51000	N	2000	N	0		0	
Chloroform	67663	1.00E-02	I			6.10E-03	I	8.05E-02	I	x	0.15	C	0.078	C	0.52	C	940	C	100	C	0.2	E
Chloromethane	74873					1.30E-02	H	6.30E-03	H	x	1.4	C	0.99	C	0.24	C	440	C	49	C	0.063	C
4-Chloro-2,2-methylaniline hydrochlorid	3165933					4.60E-01	H		0.15	C	0.014	C	0.0069	C	12	C	1.4	C	0		0	
4-Chloro-2-methylaniline	95692					5.80E-01	H		0.12	C	0.011	C	0.0054	C	9.9	C	1.1	C	0		0	
beta-Chloronaphthalene	91587	8.00E-02	I						2900	N	290	N	110	N	160000	N	6300	N	2.8	S	140	N
o-Chloronitrobenzene	88733					2.50E-02	H	x	0.42	C	0.25	C	0.13	C	230	C	26	C	0		0	
p-Chloronitrobenzene	100005					1.80E-02	H	x	0.59	C	0.35	C	0.18	C	320	C	35	C	0		0	
2-Chlorophenol	95578	5.00E-03	I						180	N	18	N	6.8	N	10000	N	390	N	53000	E	2	E
2-Chloropropane	75296			2.86E-02	H			x	170	N	100	N	0		0		0		22	N	0.64	N
Chlorothalonil	1897456	1.50E-02	I			1.10E-02	H		6.1	C	0.57	C	0.29	C	520	C	58	C	0		0	
o-Chlorotoluene	95498	2.00E-02	I					x	120	N	73	N	27	N	41000	N	1600	N	1200	N	5.6	N
Chlorpropham	101213	2.00E-01	I						7300	N	730	N	270	N	410000	N	16000	N	0		0	
Chlorpyrifos	2921882	3.00E-03	I						110	N	11	N	4.1	N	6100	N	230	N	0		0	
Chlorpyrifos-methyl	5598130	1.00E-02	H						370	N	37	N	14	N	20000	N	780	N	0		0	
Chlorsulfuron	64902723	5.00E-02	I						1800	N	180	N	68	N	100000	N	3900	N	0		0	
Chlorthiophos	60238564	8.00E-04	H						29	N	2.9	N	1.1	N	1600	N	63	N	0		0	
Chromium III and compounds	16065831	1.00E+00	I	5.71E-07	W				37000	N	0.0021	N	1400	N	1000000	N	78000	N	0		0	
Chromium VI and compounds	18540299	5.00E-03	I				4.20E+01	I	180	N	0.00015	C	6.8	N	10000	N	390	N	140	E	19	E
Coal tar	8001589						2.20E+00	W	0		0.0028	C	0		0		0		0		0	
Cobalt	7440484	6.00E-02	E						2200	N	220	N	81	N	120000	N	4700	N	0		0	
Coke Oven Emissions	8007452						2.17E+00	I	0		0.0029	C	0		0		0		0		0	
Copper and compounds	7440508	4.00E-02	E						1500	N	150	N	54	N	82000	N	3100	N	0		0	
Crotonaldehyde	123739	1.00E-02	W			1.90E+00	H	1.90E+00	W	0.035	C	0.0033	C	0.0017	C	3	C	0.34	C	0		0
Cumene	98828	4.00E-02	I	2.57E-03	H				1500	N	9.4	N	54	N	82000	N	3100	N	81	N	65	N
Cyanides:	0								0		0		0		0		0		0		0	
Barium cyanide	542621	1.00E-01	W						3700	N	370	N	140	N	200000	N	7800	N	0		0	
Calcium cyanide	592018	4.00E-02	I						1500	N	150	N	54	N	82000	N	3100	N	0		0	
**Chlorine cyanide	506774	5.00E-02	I						1800	N	180	N	68	N	100000	N	3900	N	0		0	
Copper cyanide	544923	5.00E-03	I						180	N	18	N	6.8	N	10000	N	390	N	0		0	
Cyanazine	21725462	2.00E-03	H			8.40E-01	H		0.08	C	0.0075	C	0.0038	C	6.8	C	0.76	C	0		0	
Cyanogen	460195	4.00E-02	I						1500	N	150	N	54	N	82000	N	3100	N	0		0	
Cyanogen bromide	506683	9.00E-02	I						3300	N	330	N	120	N	180000	N	7000	N	0		0	
Cyanogen chloride	506774	5.00E-02	I						1800	N	180	N	68	N	100000	N	3900	N	0		0	
Free cyanide	57125	2.00E-02	I						730	N	73	N	27	N	41000	N	1600	N	0		0	
Hydrogen cyanide	74908	2.00E-02	I	8.57E-04	I				730	N	3.1	N	27	N	41000	N	1600	N	0		0	

Potassium cyanide	151508	5.00E-02	I						1800 N	180 N	68 N	100000 N	3900 N	0	0		
Potassium silver cyanide	506616	2.00E-01	I						7300 N	730 N	270 N	410000 N	16000 N	0	0		
Silver cyanide	506649	1.00E-01	I						3700 N	370 N	140 N	200000 N	7800 N	0	0		
Sodium cyanide	143339	4.00E-02	I						1500 N	150 N	54 N	82000 N	3100 N	0	0		
Thiocyanate	0	2.00E-02	E						730 N	73 N	27 N	41000 N	1600 N	0	0		
Zinc cyanide	557211	5.00E-02	I						1800 N	180 N	68 N	100000 N	3900 N	0	0		
Cyclohexanone	108941	5.00E+00	I				x		30000 N	18000 N	6800 N	1000000 N	390000 N	0	0		
Cyclohexamine	108918	2.00E-01	I						7300 N	730 N	270 N	410000 N	16000 N	0	0		
Cyhalothrin/Karate	68085858	5.00E-03	I						180 N	18 N	6.8 N	10000 N	390 N	0	0		
Cypermethrin	52315078	1.00E-02	I						370 N	37 N	14 N	20000 N	780 N	0	0		
Cyromazine	66215278	7.50E-03	I						270 N	27 N	10 N	15000 N	590 N	0	0		
Dacthal	1861321	1.00E-02	I						370 N	37 N	14 N	20000 N	780 N	0	0		
Dalapon	75990	3.00E-02	I						1100 N	110 N	41 N	61000 N	2300 N	0	0		
Danitol	39515418	2.50E-02	I						910 N	91 N	34 N	51000 N	2000 N	0	0		
DDD	72548				2.40E-01	I			0.28 C	0.026 C	0.013 C	24 C	2.7 C	37 S	0.7 E		
DDE	72559				3.40E-01	I			0.2 C	0.018 C	0.0093 C	17 C	1.9 C	10 S	0.5 E		
DDT	50293	5.00E-04	I		3.40E-01	I	3.40E-01	I	0.2 C	0.018 C	0.0093 C	17 C	1.9 C	80 E	1 E		
Decabromodiphenyl ether	1163195	1.00E-02	I				x		61 N	37 N	14 N	20000 N	780 N	0	0		
Demeton	8065483	4.00E-05	I						1.5 N	0.15 N	0.054 N	82 N	3.1 N	0	0		
Diallate	2303164				6.10E-02	H		x	0.17 C	0.1 C	0.052 C	94 C	10 C	0	0		
Diazinon	333415	9.00E-04	H						33 N	3.3 N	1.2 N	1800 N	70 N	5400 S	2.8 N		
Dibenzofuran	132649	4.00E-03	E						150 N	15 N	5.4 N	8200 N	310 N	120 S	120 N		
1,4-Dibromobenzene	106376	1.00E-02	I				x		61 N	37 N	14 N	20000 N	780 N	0	0		
1,2-Dibromo-3-chloropropane	96128			5.71E-05	I	1.40E+00	H	2.42E-03	H	x	0.048 C	0.21 N	0.0023 C	4.1 C	0.46 C	1.9 N	0.00061 M
1,2-Dibromoethane	106934			5.71E-05	H	8.50E+01	I	7.70E-01	I	x	0.00075 C	0.0081 C	0.000037 C	0.067 C	0.0075 C	0.0058 C	0.00018 M
Dibutyl phthalate	84742	1.00E-01	I						3700 N	370 N	140 N	200000 N	7800 N	100 E	120 E		
Dicamba	1918009	3.00E-02	I						1100 N	110 N	41 N	61000 N	2300 N	0	0		
1,2-Dichlorobenzene	95501	9.00E-02	I	4.00E-02	A			x	270 N	150 N	120 N	180000 N	7000 N	300 E	6 E		
1,3-Dichlorobenzene	541731	8.90E-02	O					x	540 N	320 N	120 N	180000 N	7000 N	0	0		
1,4-Dichlorobenzene	108467			2.29E-01	I	2.40E-02	H	x	0.44 C	0.26 C	0.13 C	240 C	27 C	7700 E	1 E		
3,3'-Dichlorobenzidine	91941					4.50E-01	I		0.15 C	0.014 C	0.007 C	13 C	1.4 C	52 S	0.01 E		
1,4-Dichloro-2-butene	764410							9.30E+00	H	x	0.0011 C	0.00067 C	0	0	0	0	
Dichlorodifluoromethane	75718	2.00E-01	I	5.71E-02	A			x	390 N	210 N	270 N	410000 N	16000 N	37 N	7.5 N		
1,1-Dichloroethane	75343	1.00E-01	H	1.43E-01	A			x	810 N	520 N	140 N	200000 N	7800 N	980 E	11 E		
1,2-Dichloroethane (EDC)	107062			2.86E-03	E	9.10E-02	I	9.10E-02	I	x	0.12 C	0.069 C	0.035 C	63 C	7 C	0.3 E	0.01 E
1,1-Dichloroethylene	75354	9.00E-03	I			6.00E-01	I	1.75E-01	I	x	0.044 C	0.036 C	0.0053 C	9.5 C	1.1 C	0.04 E	0.03 E
1,2-Dichloroethylene (cis)	156592	1.00E-02	H					x	61 N	37 N	14 N	20000 N	780 N	1500 E	0.2 E		
1,2-Dichloroethylene (trans)	156605	2.00E-02	I					x	120 N	73 N	27 N	41000 N	1600 N	3600 E	0.3 E		
1,2-Dichloroethylene (mixture)	540590	9.00E-03	H					x	55 N	33 N	12 N	18000 N	700 N	0	0		
2,4-Dichlorophenol	120832	3.00E-03	I						110 N	11 N	4.1 N	6100 N	230 N	4800 S	0.5 E		
2,4-Dichlorophenoxyacetic Acid (2,4-D)	94757	1.00E-02	I					x	61 N	37 N	14 N	20000 N	780 N	7000 S	1.7 M		
4-(2,4-Dichlorophenoxy)butyric Acid	94826	8.00E-03	I						290 N	29 N	11 N	16000 N	630 N	0	0		
1,2-Dichloropropane	78875			1.14E-03	I	6.80E-02	H		0.16 C	0.092 C	0.046 C	84 C	9.4 C	11 E	0.02 E		
2,3-Dichloropropanol	616239	3.00E-03	I						110 N	11 N	4.1 N	6100 N	230 N	0	0		
1,3-Dichloropropene	542756	3.00E-04	I	5.71E-03	I	1.75E-01	H	1.30E-01	H	x	0.077 C	0.048 C	0.018 C	33 C	3.7 C	0.1 E	0.001 E
Dichlorvos	62737	5.00E-04	I	1.43E-04	I	2.90E-01	I		0.23 C	0.022 C	0.011 C	20 C	2.2 C	3.5 C	0.00072 C		
Dicofol	115322					4.40E-01	W		0.15 C	0.014 C	0.0072 C	13 C	1.5 C	0	0		
Dicyclopentadiene	77736	3.00E-02	H	5.71E-05	A			x	0.42 N	0.21 N	41 N	61000 N	2300 N	0	0		
Dieldrin	60571	5.00E-05	I			1.60E+01	I	1.61E+01	I		0.0042 C	0.00039 C	0.0002 C	0.36 C	0.04 C	2 E	0.001 E
Diesel emissions	0			1.43E-03	I				52 N	5.2 N	0	0	0	0	0	0	
Diethyl phthalate	84662	8.00E-01	I						29000 N	2900 N	1100 N	1000000 N	63000 N	520 E	110 E		
Diethylene glycol, monobutyl ether	112345			5.71E-03	H				210 N	21 N	0	0	0	0	0	0	
Diethylene glycol, monoethyl ether	111900	2.00E+00	H						73000 N	7300 N	2700 N	1000000 N	160000 N	0	0		
Diethylformamide	617845	1.10E-02	H						400 N	40 N	15 N	22000 N	860 N	0	0		

Di(2-ethylhexyl)adipate	103231	6.00E-01	I		1.20E-03	I		56	C	5.2	C	2.6	C	4800	C	530	C	0	0
Diethylstilbestrol	56531				4.70E+03	H		0.000014	C	1.3E-06	C	7E-07	C	0.0012	C	0.00014	C	0	0
Difenzoquat (Avenge)	43222486	8.00E-02	I					2900	N	290	N	110	N	160000	N	6300	N	0	0
Diflubenzuron	35367385	2.00E-02	I					730	N	73	N	27	N	41000	N	1600	N	0	0
1,1-Difluoroethane	75376			1.14E+01	I			x	69000	N	42000	N	0	0	0	0	0	0	0
Diisopropyl methylphosphonate (DIMP)	1445756	8.00E-02	I					2900	N	290	N	110	N	160000	N	6300	N	0	0
Dimethipin	55290647	2.00E-02	I					730	N	73	N	27	N	41000	N	1600	N	0	0
Dimethoate	60515	2.00E-04	I					7.3	N	0.73	N	0.27	N	410	N	16	N	0	0
3,3'-Dimethoxybenzidine	119904							4.8	C	0.45	C	0.23	C	410	C	46	C	0	0
Dimethylamine	124403			5.71E-06	W			0.21	N	0.021	N	0	0	0	0	0	0	0	0
2,4-Dimethylaniline hydrochloride	21436964							0.12	C	0.011	C	0.0054	C	9.9	C	1.1	C	0	0
2,4-Dimethylaniline	95681							0.09	C	0.0083	C	0.0042	C	7.6	C	0.85	C	0	0
N,N-Dimethylaniline	121697	2.00E-03	I					73	N	7.3	N	2.7	N	4100	N	160	N	0	0
3,3'-Dimethylbenzidine	119937							0.0073	C	0.00068	C	0.00034	C	0.62	C	0.069	C	29	C
N,N-Dimethylformamide	68122	1.00E-01	H	8.57E-03	I			3700	N	31	N	140	N	200000	N	7800	N	0	0
1,1-Dimethylhydrazine	57147							0.026	C	0.0018	C	0.0012	C	2.2	C	0.25	C	0	0
1,2-Dimethylhydrazine	540738							0.0018	C	0.00017	C	0.000085	C	0.15	C	0.017	C	0	0
2,4-Dimethylphenol	105679	2.00E-02	I					730	N	73	N	27	N	41000	N	1600	N	5400	S
2,6-Dimethylphenol	576261	6.00E-04	I					22	N	2.2	N	0.81	N	1200	N	47	N	0	0
3,4-Dimethylphenol	95658	1.00E-03	I					37	N	3.7	N	1.4	N	2000	N	78	N	0	0
Dimethyl phthalate	131113	1.00E+01	H					370000	N	37000	N	14000	N	1000000	N	780000	N	1600	E
Dimethyl terephthalate	120616	1.00E-01	I					3700	N	370	N	140	N	200000	N	7800	N	0	0
1,2-Dinitrobenzene	528290	4.00E-04	H					15	N	1.5	N	0.54	N	820	N	31	N	0	0
1,3-Dinitrobenzene	99850	1.00E-04	I					3.7	N	0.37	N	0.14	N	200	N	7.8	N	0	0
1,4-Dinitrobenzene	100254	4.00E-04	H					15	N	1.5	N	0.54	N	820	N	31	N	0	0
4,6-Dinitro-o-cyclohexyl phenol	131895	2.00E-03	I					73	N	7.3	N	2.7	N	4100	N	160	N	0	0
2,4-Dinitrophenol	51285	2.00E-03	I					73	N	7.3	N	2.7	N	4100	N	160	N	360	N
Dinitrotoluene mixture	0				6.80E-01	I		0.099	C	0.0092	C	0.0046	C	8.4	C	0.94	C	0	0
2,4-Dinitrotoluene	121142	2.00E-03	I					73	N	7.3	N	2.7	N	4100	N	160	N	120	S
2,6-Dinitrotoluene	606202	1.00E-03	H					37	N	3.7	N	1.4	N	2000	N	78	N	370	S
Dinoseb	88857	1.00E-03	I					37	N	3.7	N	1.4	N	2000	N	78	N	0	0
di-n-Octyl phthalate	117840	2.00E-02	H					730	N	73	N	27	N	41000	N	1600	N	1000000	S
1,4-Dioxane	123911				1.10E-02	I		6.1	C	0.57	C	0.29	C	520	C	58	C	0	0
Diphenamid	957517	3.00E-02	I					1100	N	110	N	41	N	61000	N	2300	N	0	0
Diphenylamine	122394	2.50E-02	I					910	N	91	N	34	N	51000	N	2000	N	0	0
1,2-Diphenylhydrazine	122667				8.00E-01	I	7.70E-01	I	0.084	C	0.0081	C	0.0039	C	7.2	C	0.8	C	0
Diquat	85007	2.20E-03	I					80	N	8	N	3	N	4500	N	170	N	0	0
Direct black 38	1937377				8.60E+00	H		0.0078	C	0.00073	C	0.00037	C	0.67	C	0.074	C	0	0
Direct blue 6	2602462				8.10E+00	H		0.0083	C	0.00077	C	0.00039	C	0.71	C	0.079	C	0	0
Direct brown 95	16071866				9.30E+00	H		0.0072	C	0.00067	C	0.00034	C	0.62	C	0.069	C	0	0
Disulfoton	298044	4.00E-05	I					1.5	N	0.15	N	0.054	N	82	N	3.1	N	0	0
1,4-Dithiane	505293	1.00E-02	I					370	N	37	N	14	N	20000	N	780	N	0	0
Diuron	330541	2.00E-03	I					73	N	7.3	N	2.7	N	4100	N	160	N	0	0
Dodine	2439103	4.00E-03	I					150	N	15	N	5.4	N	8200	N	310	N	0	0
Endosulfan	115297	6.00E-03	I					220	N	22	N	8.1	N	12000	N	470	N	1	S
Endothall	145733	2.00E-02	I					730	N	73	N	27	N	41000	N	1600	N	0	0
Endrin	72208	3.00E-04	I					11	N	1.1	N	0.41	N	610	N	23	N	16	S
Epichlorohydrin	106898	2.00E-03	H	2.86E-04	I	9.90E-03	I	4.20E-03	I	6.8	C	1	N	0.32	C	580	C	65	C
1,2-Epoxybutane	106887			5.71E-03	I			210	N	21	N	0	0	0	0	0	0	0	0
Ethephon (2-chloroethyl phosphonic aci	16672870	5.00E-03	I					180	N	18	N	6.8	N	10000	N	390	N	0	0
Ethion	563122	5.00E-04	I					18	N	1.8	N	0.68	N	1000	N	39	N	0	0
2-Ethoxyethanol acetate	111159	3.00E-01	A					11000	N	1100	N	410	N	610000	N	23000	N	0	0
2-Ethoxyethanol	110805	4.00E-01	H	5.71E-02	I			15000	N	210	N	540	N	820000	N	31000	N	0	0
Ethyl acrylate	140885				4.80E-02	H		1.4	C	0.13	C	0.066	C	120	C	13	C	0	0

EPTC (S-Ethyl dipropylthiocarbamate)	759944	2.50E-02	I							910	N	91	N	34	N	51000	N	2000	N	0	0	
Ethyl acetate	141786	9.00E-01	I							33000	N	3300	N	1200	N	1000000	N	70000	N	0	0	
Ethylbenzene	100414	1.00E-01	I	2.86E-01	I			x		1300	N	1000	N	140	N	200000	N	7800	N	260	E	
Ethylene cyanohydrin	109784	3.00E-01	H							11000	N	1100	N	410	N	610000	N	23000	N	0	0	
Ethylene diamine	107153	2.00E-02	H							730	N	73	N	27	N	41000	N	1600	N	0	0	
Ethylene glycol	107211	2.00E+00	I							73000	N	7300	N	2700	N	1000000	N	160000	N	0	0	
Ethylene glycol, monobutyl ether	111762			5.71E-03	H					210	N	21	N	0		0		0		0	0	
Ethylene oxide	75218					1.02E+00	H	3.50E-01	H	0.066	C	0.018	C	0.0031	C	5.6	C	0.63	C	0	0	
Ethylene thiourea (ETU)	96457	8.00E-05	I			1.19E-01	H			0.57	C	0.053	C	0.027	C	48	C	5.4	C	0	0	
Ethyl ether	60297	2.00E-01	I					x		1200	N	730	N	270	N	410000	N	16000	N	0	0	
Ethyl methacrylate	97632	9.00E-02	H							3300	N	330	N	120	N	180000	N	7000	N	0	0	
Ethyl p-nitrophenyl phenylphosphorothio	2104645	1.00E-05	I							0.37	N	0.037	N	0.014	N	20	N	0.78	N	0	0	
Ethynitrosourea	759739					1.40E+02	W			0.00048	C	0.000045	C	0.000023	C	0.041	C	0.0046	C	0	0	
Ethylphthalyl ethyl glycolate	84720	3.00E+00	I							110000	N	11000	N	4100	N	1000000	N	230000	N	0	0	
Express	10120	8.00E-03	I							290	N	29	N	11	N	16000	N	630	N	0	0	
Fenamiphos	22224926	2.50E-04	I							9.1	N	0.91	N	0.34	N	510	N	20	N	0	0	
Fluometuron	2164172	1.30E-02	I							470	N	47	N	18	N	27000	N	1000	N	0	0	
Fluoride	7782414	6.00E-02	I							2200	N	220	N	81	N	120000	N	4700	N	0	0	
Fluoridone	59756604	8.00E-02	I							2900	N	290	N	110	N	160000	N	6300	N	0	0	
Flurprimidol	56425913	2.00E-02	I							730	N	73	N	27	N	41000	N	1600	N	0	0	
Flutolanil	66332965	6.00E-02	I							2200	N	220	N	81	N	120000	N	4700	N	0	0	
Fluvalinate	69409945	1.00E-02	I							370	N	37	N	14	N	20000	N	780	N	0	0	
Folpet	133073	1.00E-01	I			3.50E-03	I			19	C	1.8	C	0.9	C	1600	C	180	C	0	0	
Fomesafen	72178020					1.90E-01	I			0.35	C	0.033	C	0.017	C	30	C	3.4	C	0	0	
Fonofos	944229	2.00E-03	I							73	N	7.3	N	2.7	N	4100	N	160	N	0	0	
Formaldehyde	50000	2.00E-01	I			4.55E-02	I			7300	N	0.14	C	270	N	410000	N	16000	N	0	0	
Formic Acid	64186	2.00E+00	H							73000	N	7300	N	2700	N	1000000	N	160000	N	0	0	
Fosetyl-al	39148248	3.00E+00	I							110000	N	11000	N	4100	N	1000000	N	230000	N	0	0	
Furan	110009	1.00E-03	I							37	N	3.7	N	1.4	N	2000	N	78	N	0	0	
Furazolidone	67458					3.80E+00	H			0.018	C	0.0016	C	0.00083	C	1.5	C	0.17	C	0	0	
Furfural	98011	3.00E-03	I	1.43E-02	A					110	N	52	N	4.1	N	6100	N	230	N	0	0	
Furium	531828					5.00E+01	H			0.0013	C	0.00013	C	0.000063	C	0.11	C	0.013	C	0	0	
Furmecycloz	60568050					3.00E-02	I			2.2	C	0.21	C	0.11	C	190	C	21	C	0	0	
Glufosinate-ammonium	77182822	4.00E-04	I							15	N	1.5	N	0.54	N	820	N	31	N	0	0	
Glycidaldehyde	765344	4.00E-04	I	2.86E-04	H					15	N	1	N	0.54	N	820	N	31	N	0	0	
Glyphosate	1071836	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0	0	
Haloxypop-methyl	69806402	5.00E-05	I							1.8	N	0.18	N	0.068	N	100	N	3.9	N	0	0	
Harmony	79277273	1.30E-02	I							470	N	47	N	18	N	27000	N	1000	N	0	0	
HCH (alpha)	319846					6.30E+00	I	6.30E+00	I	0.011	C	0.00099	C	0.0005	C	0.91	C	0.1	C	0.9	E	
HCH (beta)	319857					1.80E+00	I	1.80E+00	I	0.037	C	0.0035	C	0.0018	C	3.2	C	0.35	C	16	E	
HCH (gamma) Lindane	58899	3.00E-04	I			1.30E+00	H			0.052	C	0.0048	C	0.0024	C	4.4	C	0.49	C	4.2	C	
HCH-technical	608731					1.80E+00	I	1.79E+00	I	0.037	C	0.0035	C	0.0018	C	3.2	C	0.35	C	0	0	
Heptachlor	76448	5.00E-04	I			4.50E+00	I	4.55E+00	I	x	0.0023	C	0.0014	C	0.0007	C	1.3	C	0.14	C	0.3	E
Heptachlor epoxide	1024573	1.30E-05	I			9.10E+00	I	9.10E+00	I	x	0.0012	C	0.00069	C	0.00035	C	0.63	C	0.07	C	1	E
Hexabromobenzene	87821	2.00E-03	I					x		12	N	7.3	N	2.7	N	4100	N	160	N	0	0	
Hexachlorobenzene	118741	8.00E-04	I			1.60E+00	I	1.61E+00	I	x	0.0066	C	0.0039	C	0.002	C	3.6	C	0.4	C	1	E
Hexachlorobutadiene	87683	2.00E-04	H			7.80E-02	I	7.70E-02	I	x	0.14	C	0.081	C	0.04	C	73	C	8.2	C	1	E
Hexachlorocyclopentadiene	77474	7.00E-03	I	2.00E-05	H			x		0.15	N	0.073	N	9.5	N	14000	N	550	N	2	E	
Hexachlorodibenzo-p-dioxin mixture	19408743					6.20E+03	I	4.55E+03	I	0.000011	C	1.4E-06	C	5E-07	C	0.00092	C	0.0001	C	0	0	
Hexachloroethane	67721	1.00E-03	I			1.40E-02	I	1.40E-02	I	x	0.75	C	0.45	C	0.23	C	410	C	46	C	49	E
Hexachlorophene	70304	3.00E-04	I							11	N	1.1	N	0.41	N	610	N	23	N	0	0	
Hexahydro-1,3,5-trinitro-1,3,5-triazine	121824	3.00E-03	I			1.10E-01	I			0.61	C	0.057	C	0.029	C	52	C	5.8	C	0	0	
1,6-Hexamethylene diisocyanate	822060			2.86E-06	I					0.1	N	0.01	N	0		0		0		0	0	
n-Hexane	110543	6.00E-02	H	5.71E-02	I			x		350	N	210	N	81	N	120000	N	4700	N	32	N	

Hexazinone	51235042	3.30E-02	I					1200 N	120 N	45 N	67000 N	2800 N	0	0			
Hydrazine, hydrazine sulfate	302012				3.00E+00	I	1.71E+01	I	0.022 C	0.00037 C	0.0011 C	1.9 C	0.21 C	0	0		
Hydrogen chloride	7647010			5.71E-03	I			210 N	21 N	0	0	0	0	0	0		
Hydrogen sulfide	7783064	3.00E-03	I	2.85E-04	I			110 N	1 N	4.1 N	6100 N	230 N	0	0	0		
Hydroquinone	123319	4.00E-02	H					1500 N	150 N	54 N	82000 N	3100 N	0	0	0		
Imazalil	35554440	1.30E-02	I					470 N	47 N	18 N	27000 N	1000 N	0	0	0		
Imazaquin	81335377	2.50E-01	I					9100 N	910 N	340 N	510000 N	20000 N	0	0	0		
Iprodione	36734197	4.00E-02	I					1500 N	150 N	54 N	82000 N	3100 N	0	0	0		
Iron	7439896	3.00E-01	E					11000 N	1100 N	410 N	610000 N	23000 N	0	0	0		
Isobutanol	78831	3.00E-01	I				x	1800 N	1100 N	410 N	610000 N	23000 N	0	0	0		
Isophorone	78591	2.00E-01	I		9.50E-04	I		71 C	6.6 C	3.3 C	6000 C	670 C	3400 E	0.2 E	0		
Isopropalin	33820530	1.50E-02	I					550 N	55 N	20 N	31000 N	1200 N	0	0	0		
Isopropyl methyl phosphonic acid	1832548	1.00E-01	I					3700 N	370 N	140 N	200000 N	7800 N	0	0	0		
Isoxaben	82558507	5.00E-02	I					1800 N	180 N	68 N	100000 N	3900 N	0	0	0		
Kepone	143500				1.80E+01	E		0.0037 C	0.00035 C	0.00018 C	0.32 C	0.035 C	0	0	0		
Lactofen	77501634	2.00E-03	I					73 N	7.3 N	2.7 N	4100 N	160 N	0	0	0		
Linuron	330552	2.00E-03	I					73 N	7.3 N	2.7 N	4100 N	160 N	0	0	0		
Lithium	7439932	2.00E-02	E					730 N	73 N	27 N	41000 N	1600 N	0	0	0		
Londax	83056996	2.00E-01	I					7300 N	730 N	270 N	410000 N	16000 N	0	0	0		
Malathion	121755	2.00E-02	I					730 N	73 N	27 N	41000 N	1600 N	0	0	0		
Maleic anhydride	108316	1.00E-01	I					3700 N	370 N	140 N	200000 N	7800 N	0	0	0		
Maleic hydrazide	123331	5.00E-01	I					18000 N	1800 N	680 N	1000000 N	39000 N	0	0	0		
Malononitrile	109773	2.00E-05	H					0.73 N	0.073 N	0.027 N	41 N	1.6 N	0	0	0		
Mancozeb	8018017	3.00E-02	H					1100 N	110 N	41 N	61000 N	2300 N	0	0	0		
Maneb	12427382	5.00E-03	I					180 N	18 N	6.8 N	10000 N	390 N	0	0	0		
**Manganese and compounds	7439965	2.30E-02	I	1.43E-05	I			840 N	0.052 N	31 N	47000 N	1800 N	0	0	0		
Mephosfolan	950107	9.00E-05	H					3.3 N	0.33 N	0.12 N	180 N	7 N	0	0	0		
Mepiquat chloride	24307264	3.00E-02	I					1100 N	110 N	41 N	61000 N	2300 N	0	0	0		
Mercuric chloride	7487947	3.00E-04	I					11 N	1.1 N	0.41 N	610 N	23 N	0	0	0		
Mercury (inorganic)	7439976	3.00E-04	H	8.57E-05	H			11 N	0.31 N	0.41 N	610 N	23 N	7 E	3 E	0		
Mercury (methyl)	22967926	1.00E-04	I					3.7 N	0.37 N	0.14 N	200 N	7.8 N	0	0	0		
Merphos	150505	3.00E-05	I					1.1 N	0.11 N	0.041 N	61 N	2.3 N	0	0	0		
Merphos oxide	78488	3.00E-05	I					1.1 N	0.11 N	0.041 N	61 N	2.3 N	0	0	0		
Metalaxyl	57837191	6.00E-02	I					2200 N	220 N	81 N	120000 N	4700 N	0	0	0		
Methacrylonitrile	126987	1.00E-04	I	2.00E-04	A			3.7 N	0.73 N	0.14 N	200 N	7.8 N	0	0	0		
Methamidophos	10265926	5.00E-05	I					1.8 N	0.18 N	0.068 N	100 N	3.9 N	0	0	0		
Methanol	67561	5.00E-01	I					18000 N	1800 N	680 N	1000000 N	39000 N	0	0	0		
Methidathion	950378	1.00E-03	I					37 N	3.7 N	1.4 N	2000 N	78 N	0	0	0		
Methomyl	16752775	2.50E-02	I					910 N	91 N	34 N	51000 N	2000 N	0	0	0		
Methoxychlor	72435	5.00E-03	I					180 N	18 N	6.8 N	10000 N	390 N	41 S	62 E	0		
2-Methoxyethanol acetate	110496	2.00E-03	A					73 N	7.3 N	2.7 N	4100 N	160 N	0	0	0		
2-Methoxyethanol	109864	1.00E-03	H	5.71E-03	I			37 N	21 N	1.4 N	2000 N	78 N	0	0	0		
2-Methoxy-5-nitroaniline	99592				4.60E-02	H		1.5 C	0.14 C	0.069 C	120 C	14 C	0	0	0		
Methyl acetate	79209	1.00E+00	H					37000 N	3700 N	1400 N	1000000 N	78000 N	0	0	0		
Methyl acrylate	96333	3.00E-02	A					1100 N	110 N	41 N	61000 N	2300 N	0	0	0		
2-Methylaniline hydrochloride	636215				1.80E-01	H		0.37 C	0.035 C	0.018 C	32 C	3.5 C	0	0	0		
2-Methylaniline	95534				2.40E-01	H		0.28 C	0.026 C	0.013 C	24 C	2.7 C	0	0	0		
Methyl chlorocarbonate	79221	1.00E+00	W					37000 N	3700 N	1400 N	1000000 N	78000 N	0	0	0		
4-(2-Methyl-4-chlorophenoxy) butyric ac	94815	1.00E-02	I					370 N	37 N	14 N	20000 N	780 N	0	0	0		
2-Methyl-4-chlorophenoxyacetic acid	94746	5.00E-04	I					18 N	1.8 N	0.68 N	1000 N	39 N	0	0	0		
2-(2-Methyl-14-chlorophenoxy)propionic	93652	1.00E-03	I					37 N	3.7 N	1.4 N	2000 N	78 N	0	0	0		
Methylcyclohexane	108872			8.57E-01	H			31000 N	3100 N	0	0	0	60 S	1500 N	0		
Methylene bromide	74953	1.00E-02	A				x	61 N	37 N	14 N	20000 N	780 N	0	0	0		
Methylene chloride	75092	6.00E-02	I	8.57E-01	H	7.50E-03	I	1.64E-03	I	x	4.1 C	3.8 C	0.42 C	760 C	85 C	7 E	0.01 E

4,4'-Methylene bis(2-chloroaniline)	101144	7.00E-04	H			1.30E-01	H			0.52	C	0.048	C	0.024	C	44	C	4.9	C	0		0	
4,4'-Methylenebisbenzeneamine	101779					2.50E-01	W			0.27	C	0.025	C	0.013	C	23	C	2.6	C	0		0	
4,4'-Methylene bis(N,N'-dimethyl)aniline	101611					4.60E-02	I			1.5	C	0.14	C	0.069	C	120	C	14	C	0		0	
4,4'-Methylenediphenyl isocyanate	101688			5.71E-06	I			x		0.035	N	0.021	N	0		0		0		0		0	
Methyl ethyl ketone	78933	6.00E-01	I	2.86E-01	I			x		1900	N	1000	N	810	N	1000000	N	47000	N	0		0	
Methyl hydrazine	60344					1.10E+00	W			0.061	C	0.0057	C	0.0029	C	5.2	C	0.58	C	0		0	
Methyl isobutyl ketone	108101	8.00E-02	H	2.29E-02	A					2900	N	84	N	110	N	160000	N	6300	N	0		0	
Methyl methacrylate	80626	8.00E-02	H							2900	N	290	N	110	N	160000	N	6300	N	0		0	
2-Methyl-5-nitroaniline	99558					3.30E-02	H			2	C	0.19	C	0.096	C	170	C	19	C	0		0	
Methyl parathion	298000	2.50E-04	I							9.1	N	0.91	N	0.34	N	510	N	20	N	28	S	0.041	N
2-Methylphenol (o-cresol)	95487	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	12000	S	6	E
3-Methylphenol (m-cresol)	103394	5.00E-02	I							1800	N	180	N	68	N	100000	N	3900	N	0		0	
4-Methylphenol (p-cresol)	106445	5.00E-03	H							180	N	18	N	6.8	N	10000	N	390	N	0		0	
Methyl styrene (mixture)	25013154	6.00E-03	A	1.14E-02	A			x		60	N	42	N	8.1	N	12000	N	470	N	100	N	1	N
Methyl styrene (alpha)	98839	7.00E-02	A					x		430	N	260	N	95	N	140000	N	5500	N	8.8	S	7.5	N
Methyl tertbutyl ether (MTBE)	1634044	5.00E-03	E	8.57E-01	I			x		180	N	3100	N	6.8	N	10000	N	390	N	0		0	
Metolacolor (Dual)	51218452	1.50E-01	H							5500	N	550	N	200	N	310000	N	12000	N	0		0	
Metribuzin	21087649	2.50E-02	I							910	N	91	N	34	N	51000	N	2000	N	0		0	
Mirex	2385855	2.00E-04	I			1.80E+00	W			0.037	C	0.0035	C	0.0018	C	3.2	C	0.35	C	0		0	
Molinate	2212671	2.00E-03	I							73	N	7.3	N	2.7	N	4100	N	160	N	0		0	
Molybdenum	7439987	5.00E-03	I							180	N	18	N	6.8	N	10000	N	390	N	0		0	
Monochloramine	10599903	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0		0	
Naled	300765	2.00E-03	I							73	N	7.3	N	2.7	N	4100	N	160	N	0		0	
2-Naphthylamine	91598					1.30E+02	E			0.00052	C	0.000048	C	0.000024	C	0.044	C	0.0049	C	0		0	
Napropamide	15299997	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0		0	
Nickel refinery dust	0					8.40E-01	I			0		0.0075	C	0		0		0		0		0	
Nickel and compounds	7440020	2.00E-02	I							730	N	73	N	27	N	41000	N	1600	N	6900	E	21	E
Nickel subsulfide	12035722					1.70E+00	I			0		0.0037	C	0		0		0		0		0	
Nitrapyrin	1929824	1.50E-03	W							55	N	5.5	N	2	N	3100	N	120	N	0		0	
Nitrate	14797558	1.60E+00	I							58000	N	5800	N	2200	N	1000000	N	130000	N	0		0	
Nitric oxide	10102439	1.00E-01	W							3700	N	370	N	140	N	200000	N	7800	N	0		0	
Nitrite	14797650	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0		0	
2-Nitroaniline	88744	6.00E-05	W	5.71E-05	H					2.2	N	0.21	N	0.081	N	120	N	4.7	N	0		0	
3-Nitroaniline	99092	3.00E-03	O							110	N	11	N	4.1	N	6100	N	230	N	0		0	
4-Nitroaniline	100018	3.00E-03	O							110	N	11	N	4.1	N	6100	N	230	N	0		0	
Nitrobenzene	98953	5.00E-04	I	5.71E-04	A			x		3.4	N	2.1	N	0.68	N	1000	N	39	N	110	E	0.09	E
Nitrofurantoin	67209	7.00E-02	H							2600	N	260	N	95	N	140000	N	5500	N	0		0	
Nitrofurazone	59870					1.50E+00	H	9.40E+00	H	0.045	C	0.00067	C	0.0021	C	3.8	C	0.43	C	0		0	
Nitrogen dioxide	10102440	1.00E+00	W							37000	N	3700	N	1400	N	1000000	N	78000	N	0		0	
Nitroguanidine	556887	1.00E-01	I							3700	N	370	N	140	N	200000	N	7800	N	0		0	
4-Nitrophenol	100027	6.20E-02	O							2300	N	230	N	84	N	130000	N	4800	N	0		0	
2-Nitropropane	79469			5.71E-03	I					210	N	0.00067	C	0		0		0		0		0	
N-Nitrosodi-n-butylamine	924163					5.40E+00	I	5.60E+00	I	0.012	C	0.0011	C	0.00058	C	1.1	C	0.12	C	0		0	
N-Nitrosodiethanolamine	1116547					2.80E+00	I			0.024	C	0.0022	C	0.0011	C	2	C	0.23	C	0		0	
N-Nitrosodiethylamine	55185					1.50E+02	I	1.51E+02	I	0.00045	C	0.000041	C	0.000021	C	0.038	C	0.0043	C	0		0	
N-Nitrosodimethylamine	62759					5.10E+01	I	4.90E+01	I	0.0013	C	0.00013	C	0.000062	C	0.11	C	0.013	C	0		0	
N-Nitrosodiphenylamine	86306					4.90E-03	I			14	C	1.3	C	0.64	C	1200	C	130	C	29	C	0.2	E
N-Nitroso di-n-propylamine	621647					7.00E+00	I			0.0096	C	0.00089	C	0.00045	C	0.82	C	0.091	C	0.014	C	0.00002	E
N-Nitroso-N-methylethylamine	10595956					2.20E+01	I			0.0031	C	0.00028	C	0.00014	C	0.26	C	0.029	C	0		0	
N-Nitrosopyrrolidine	930552					2.10E+00	I	2.13E+00	I	0.032	C	0.0029	C	0.0015	C	2.7	C	0.3	C	0		0	
m-Nitrotoluene	99081	1.00E-02	H					x		61	N	37	N	14	N	20000	N	780	N	460	S	0.42	N
o-Nitrotoluene	88722	1.00E-02	H					x		61	N	37	N	14	N	20000	N	780	N	460	S	0.42	N
p-Nitrotoluene	99990	1.00E-02	H					x		61	N	37	N	14	N	20000	N	780	N	460	S	0.42	N
Norflurazon	27314132	4.00E-02	I							1500	N	150	N	54	N	82000	N	3100	N	0		0	

NuStar	85509199	7.00E-04	I					26 N	2.6 N	0.95 N	1400 N	55 N	0	0
Octabromodiphenyl ether	32536520	3.00E-03	I					110 N	11 N	4.1 N	6100 N	230 N	0	0
Octahydro-1357-tetranitro-1357-tetrazo	2691410	5.00E-02	I					1800 N	180 N	68 N	100000 N	3900 N	0	0
Octamethylpyrophosphoramidate	152169	2.00E-03	H					73 N	7.3 N	2.7 N	4100 N	160 N	0	0
Oryzalin	19044883	5.00E-02	I					1800 N	180 N	68 N	100000 N	3900 N	0	0
Oxadiazon	19666309	5.00E-03	I					180 N	18 N	6.8 N	10000 N	390 N	0	0
Oxamyl	23135220	2.50E-02	I					910 N	91 N	34 N	51000 N	2000 N	0	0
Oxyfluorfen	42874033	3.00E-03	I					110 N	11 N	4.1 N	6100 N	230 N	0	0
Paclobutrazol	76738620	1.30E-02	I					470 N	47 N	18 N	27000 N	1000 N	0	0
Paraquat	1910425	4.50E-03	I					160 N	16 N	6.1 N	9200 N	350 N	0	0
Parathion	56382	6.00E-03	H					220 N	22 N	8.1 N	12000 N	470 N	110 S	3.9 N
Pebulate	1114712	5.00E-02	H					1800 N	180 N	68 N	100000 N	3900 N	0	0
Pendimethalin	40487421	4.00E-02	I					1500 N	150 N	54 N	82000 N	3100 N	0	0
Pentabromo-6-chloro cyclohexane	87843			2.30E-02	H			2.9 C	0.27 C	0.14 C	250 C	28 C	0	0
Pentabromodiphenyl ether	32534819	2.00E-03	I					73 N	7.3 N	2.7 N	4100 N	160 N	0	0
Pentachlorobenzene	608935	8.00E-04	I			x		4.9 N	2.9 N	1.1 N	1600 N	63 N	570 N	48 N
Pentachloronitrobenzene	82688	3.00E-03	I		2.60E-01	H	x	0.041 C	0.024 C	0.012 C	22 C	2.5 C	0	0
Pentachlorophenol	87865	3.00E-02	I		1.20E-01	I		0.56 C	0.052 C	0.026 C	48 C	5.3 C	7.9 C	0.2 E
Permethrin	52645531	5.00E-02	I					1800 N	180 N	68 N	100000 N	3900 N	0	0
Phenmedipham	13684634	2.50E-01	I					9100 N	910 N	340 N	510000 N	20000 N	0	0
Phenol	108952	6.00E-01	I					22000 N	2200 N	810 N	1000000 N	47000 N	21000 S	49 E
m-Phenylenediamine	108452	6.00E-03	I					220 N	22 N	8.1 N	12000 N	470 N	0	0
p-Phenylenediamine	106503	1.90E-01	H					6900 N	690 N	260 N	390000 N	15000 N	0	0
Phenylmercuric acetate	62384	8.00E-05	I					2.9 N	0.29 N	0.11 N	160 N	6.3 N	0	0
2-Phenylphenol	90437			1.94E-03	H			35 C	3.2 C	1.6 C	3000 C	330 C	0	0
Phorate	298022	2.00E-04	H					7.3 N	0.73 N	0.27 N	410 N	16 N	0	0
Phosmet	732116	2.00E-02	I					730 N	73 N	27 N	41000 N	1600 N	0	0
Phosphine	7803512	3.00E-04	I	8.57E-05	I			11 N	0.31 N	0.41 N	610 N	23 N	0	0
Phosphoric acid	7664382			2.86E-03	I			100 N	10 N	0	0	0	0	0
Phosphorus (white)	7723140	2.00E-05	I					0.73 N	0.073 N	0.027 N	41 N	1.8 N	0	0
p-Phthalic acid	100210	1.00E+00	H					37000 N	3700 N	1400 N	1000000 N	78000 N	0	0
Phthalic anhydride	85449	2.00E+00	I	3.43E-02	H			73000 N	130 N	2700 N	1000000 N	160000 N	0	0
Picloram	1918021	7.00E-02	I					2600 N	260 N	95 N	140000 N	5500 N	0	0
Pirimiphos-methyl	29232937	1.00E-02	I					370 N	37 N	14 N	20000 N	780 N	0	0
Polybrominated biphenyls	0	7.00E+06	H	0.00E+00	H			0.0076 C	0.0007 C	0.00035 C	0.84 C	0.012 C	0	0
Polychlorinated biphenyls (PCBs)	1338363			7.70E+00	I			0.0087 C	0.00081 C	0.00041 C	0.74 C	0.083 C	0	0
Aroclor 1016	12674112	7.00E-05	I					2.6 N	0.26 N	0.095 N	140 N	5.5 N	0	0
Aroclor 1254	11097691	2.00E-05	I					0.73 N	0.073 N	0.027 N	41 N	1.8 N	0	0
Polychlorinated terphenyls (PCTs)	0			4.50E+00	E			0.015 C	0.0014 C	0.0007 C	1.3 C	0.14 C	0	0
Polynuclear aromatic hydrocarbons	0							0	0	0	0	0	110000 S	0
Acenaphthene	83329	6.00E-02	I					2200 N	220 N	81 N	120000 N	4700 N	120 S	200 E
Anthracene	120127	3.00E-01	I					11000 N	1100 N	410 N	610000 N	23000 N	6.8 S	4300 E
Benz[a]anthracene	56553			7.30E-01	E	6.10E-01	E	0.092 C	0.01 C	0.0043 C	7.8 C	0.88 C	27 S	0.7 E
Benzo[b]fluoranthene	205992			7.30E-01	E	6.10E-01	E	0.092 C	0.01 C	0.0043 C	7.8 C	0.88 C	23 S	4 E
Benzo[k]fluoranthene	207089			7.30E-02	E	6.10E-02	E	0.92 C	0.1 C	0.043 C	78 C	8.8 C	0	4 E
Benzo[a]pyrene	50328			7.30E+00	I	6.10E+00	W	0.0092 C	0.001 C	0.00043 C	0.78 C	0.088 C	11 S	4 E
Carbazole	86748			2.00E-02	H			3.4 C	0.31 C	0.16 C	290 C	32 C	11 S	0.5 E
Chrysene	218019			7.30E-03	E	6.10E-03	E	9.2 C	1 C	0.43 C	780 C	88 C	3.6 S	1 E
Dibenz[ah]anthracene	53703			7.30E+00	E	6.10E+00	E	0.0092 C	0.001 C	0.00043 C	0.78 C	0.088 C	7.2 S	11 E
Fluoranthene	206440	4.00E-02	I					1500 N	150 N	54 N	82000 N	3100 N	68 S	980 E
Fluorene	86737	4.00E-02	I					1500 N	150 N	54 N	82000 N	3100 N	89 S	160 E
Indeno[1,2,3-cd]pyrene	193395			7.30E-01	E	6.10E-01	E	0.092 C	0.01 C	0.0043 C	7.8 C	0.88 C	280 S	35 E
Naphthalene	91203	4.00E-02	W					1500 N	150 N	54 N	82000 N	3100 N	180 S	30 E
Pyrene	129000	3.00E-02	I					1100 N	110 N	41 N	61000 N	2300 N	56 S	1400 E

Prochloraz	67747095	9.00E-03	I	1.50E-01	I	0.45	C	0.042	C	0.021	C	38	C	4.3	C	0	0
Profluralin	26399360	6.00E-03	H			220	N	22	N	8.1	N	12000	N	470	N	0	0
Prometon	1610180	1.50E-02	I			550	N	55	N	20	N	31000	N	1200	N	0	0
Prometryn	7287196	4.00E-03	I			150	N	15	N	5.4	N	8200	N	310	N	0	0
Pronamide	23950585	7.50E-02	I			2700	N	270	N	100	N	150000	N	5900	N	0	0
Propachlor	1918167	1.30E-02	I			470	N	47	N	18	N	27000	N	1000	N	0	0
Propanil	709988	5.00E-03	I			180	N	18	N	6.8	N	10000	N	390	N	0	0
Propargite	2312358	2.00E-02	I			730	N	73	N	27	N	41000	N	1600	N	0	0
Propargyl alcohol	107197	2.00E-03	I			73	N	7.3	N	2.7	N	4100	N	160	N	0	0
Propazine	139402	2.00E-02	I			730	N	73	N	27	N	41000	N	1600	N	0	0
Propham	122429	2.00E-02	I			730	N	73	N	27	N	41000	N	1600	N	0	0
Propiconazole	60207901	1.30E-02	I			470	N	47	N	18	N	27000	N	1000	N	0	0
Propylene glycol	57556	2.00E+01	H			730000	N	73000	N	27000	N	1000000	N	1000000	N	0	0
Propylene glycol, monoethyl ether	52125538	7.00E-01	H			26000	N	2600	N	950	N	1000000	N	55000	N	0	0
Propylene glycol, monomethyl ether	107982	7.00E-01	H	5.71E-01	I	26000	N	2100	N	950	N	1000000	N	55000	N	0	0
Propylene oxide	75569			8.57E-03	I	0.28	C	0.49	C	0.013	C	24	C	2.7	C	0	0
Pursuit	81335775	2.50E-01	I			9100	N	910	N	340	N	510000	N	20000	N	0	0
Pydrin	51630581	2.50E-02	I			910	N	91	N	34	N	51000	N	2000	N	0	0
Pyridine	110861	1.00E-03	I			37	N	3.7	N	1.4	N	2000	N	78	N	0	0
Quinalphos	13593038	5.00E-04	I			18	N	1.8	N	0.68	N	1000	N	39	N	0	0
Quinoline	91225			1.20E+01	H	0.0056	C	0.00052	C	0.00026	C	0.48	C	0.053	C	0	0
Resmethrin	10463868	3.00E-02	I			1100	N	110	N	41	N	61000	N	2300	N	0	0
Ronnel	299843	5.00E-02	H			1800	N	180	N	68	N	100000	N	3900	N	0	0
Rotenone	83794	4.00E-03	I			150	N	15	N	5.4	N	8200	N	310	N	0	0
Savey	78587050	2.50E-02	I			910	N	91	N	34	N	51000	N	2000	N	0	0
Selenious Acid	7783008	5.00E-03	I			180	N	18	N	6.8	N	10000	N	390	N	0	0
Selenium	7782492	5.00E-03	I			180	N	18	N	6.8	N	10000	N	390	N	0	3 E
Selenourea	630104	5.00E-03	H			180	N	18	N	6.8	N	10000	N	390	N	0	0
Sethoxydim	74051802	9.00E-02	I			3300	N	330	N	120	N	180000	N	7000	N	0	0
Silver and compounds	7440224	5.00E-03	I			180	N	18	N	6.8	N	10000	N	390	N	0	0
Simazine	122349	5.00E-03	I			0.56	C	0.052	C	0.026	C	48	C	5.3	C	0	0
Sodium azide	26628228	4.00E-03	I			150	N	15	N	5.4	N	8200	N	310	N	0	0
Sodium diethyldithiocarbamate	148185	3.00E-02	I			0.25	C	0.023	C	0.012	C	21	C	2.4	C	0	0
Sodium fluoroacetate	62748	2.00E-05	I			0.73	N	0.073	N	0.027	N	41	N	1.6	N	0	0
Sodium metavanadate	13718268	1.00E-03	H			37	N	3.7	N	1.4	N	2000	N	78	N	0	0
Strontium, stable	7440246	6.00E-01	I			22000	N	2200	N	810	N	1000000	N	47000	N	0	0
Strychnine	57249	3.00E-04	I			11	N	1.1	N	0.41	N	610	N	23	N	0	0
Styrene	100425	2.00E-01	I	2.86E-01	I	1600	N	1000	N	270	N	410000	N	16000	N	1400 E	2 E
Systhane	88671890	2.50E-02	I			910	N	91	N	34	N	51000	N	2000	N	0	0
2,3,7,8-TCDD (dioxin)	1746016			1.56E+05	H	4.3E-07	C	5.4E-08	C	0	C	0.000037	C	4.1E-06	C	0	0
Tebuthiuron	34014181	7.00E-02	I			2600	N	260	N	95	N	140000	N	5500	N	0	0
Temephos	3383968	2.00E-02	H			730	N	73	N	27	N	41000	N	1600	N	0	0
Terbacil	5902512	1.30E-02	I			470	N	47	N	18	N	27000	N	1000	N	0	0
Terbufos	13071799	2.50E-05	H			0.91	N	0.091	N	0.034	N	51	N	2	N	0	0
Terbutryn	886500	1.00E-03	I			37	N	3.7	N	1.4	N	2000	N	78	N	0	0
1,2,4,5-Tetrachlorobenzene	95943	3.00E-04	I			1.8	N	1.1	N	0.41	N	610	N	23	N	91 N	0.69 N
1,1,1,2-Tetrachloroethane	630206	3.00E-02	I			0.41	C	0.24	C	0.12	C	220	C	25	C	0	0
1,1,2,2-Tetrachloroethane	79345			2.00E-01	I	0.052	C	0.031	C	0.016	C	29	C	3.2	C	0.4 E	0.001 E
Tetrachloroethylene (PCE)	127184	1.00E-02	I			1.1	C	3.1	C	0.061	C	110	C	12	C	11 E	0.04 E
2,3,4,6-Tetrachlorophenol	58902	3.00E-02	I			1100	N	110	N	41	N	61000	N	2300	N	0	0
p,a,a,a-Tetrachlorotoluene	5216251			2.00E+01	H	0.00053	C	0.00031	C	0.00016	C	0.29	C	0.032	C	0	0
Tetrachlorovinphos	961115	3.00E-02	I			2.8	C	0.26	C	0.13	C	240	C	27	C	0	0
Tetraethyldithiopyrophosphate	3689245	5.00E-04	I			18	N	1.8	N	0.68	N	1000	N	39	N	0	0
Tetraethyl lead	78002	1.00E-07	I			0.0037	N	0.00037	N	0.00014	N	0.2	N	0.0078	N	0.00068 N	0.000034 N

1,1,1,2-Tetrafluoroethane	811972	I	2.29E+01			x	140000	N	84000	N	0	0	0	0	0	0
Thallic oxide	1314325	7.00E-05	W				2.6	N	0.26	N	0.095	N	140	N	5.5	N
Thallium	0						0		0		0		0		0	0.4 E
Thallium acetate	563688	9.00E-05	I				3.3	N	0.33	N	0.12	N	180	N	7	N
Thallium carbonate	6533739	8.00E-05	I				2.9	N	0.29	N	0.11	N	160	N	6.3	N
Thallium chloride	7791120	8.00E-05	I				2.9	N	0.29	N	0.11	N	160	N	6.3	N
Thallium nitrate	10102451	9.00E-05	I				3.3	N	0.33	N	0.12	N	180	N	7	N
Thallium selenite	12039520	9.00E-05	W				3.3	N	0.33	N	0.12	N	180	N	7	N
Thallium sulfate	7446186	8.00E-05	I				2.9	N	0.29	N	0.11	N	160	N	6.3	N
Thiobencarb	28249776	1.00E-02	I				370	N	37	N	14	N	20000	N	780	N
2-(Thiocyanomethylthio)-benzothiazole	21564170	3.00E-02	H				1100	N	110	N	41	N	61000	N	2300	N
Thiofanox	39196184	3.00E-04	H				11	N	1.1	N	0.41	N	610	N	23	N
Thiophanate-methyl	23564058	8.00E-02	I				2900	N	290	N	110	N	160000	N	6300	N
Thiram	137268	5.00E-03	I				180	N	18	N	6.8	N	10000	N	390	N
Tin and compounds	0	6.00E-01	H				22000	N	2200	N	810	N	1000000	N	47000	N
Toluene	108883	2.00E-01	I	1.14E-01	I	x	750	N	420	N	270	N	410000	N	16000	N
Toluene-2,4-diamine	95807				3.20E+00	H	0.021	C	0.002	C	0.00099	C	1.8	C	0.2	C
Toluene-2,5-diamine	95705	6.00E-01	H				22000	N	2200	N	810	N	1000000	N	47000	N
Toluene-2,6-diamine	823405	2.00E-01	H				7300	N	730	N	270	N	410000	N	16000	N
p-Toluidine	106490				1.90E-01	H	0.35	C	0.033	C	0.017	C	30	C	3.4	C
Toxaphene	8001352				1.10E+00	I	0.061	C	0.0056	C	0.0029	C	5.2	C	0.58	C
Tralomehrin	66841256	7.50E-03	I				270	N	27	N	10	N	15000	N	590	N
Triallate	2303175	1.30E-02	I				470	N	47	N	18	N	27000	N	1000	N
Triasulfuron	82097505	1.00E-02	I				370	N	37	N	14	N	20000	N	780	N
1,2,4-Tribromobenzene	615543	5.00E-03	I			x	30	N	18	N	6.8	N	10000	N	390	N
Tributyltin oxide (TBTO)	56359	3.00E-05	I				1.1	N	0.11	N	0.041	N	61	N	2.3	N
2,4,6-Trichloroaniline hydrochloride	33663502				2.90E-02	H	2.3	C	0.22	C	0.11	C	200	C	22	C
2,4,6-Trichloroaniline	634935				3.40E-02	H	2	C	0.18	C	0.093	C	170	C	19	C
1,2,4-Trichlorobenzene	120821	1.00E-02	I	5.71E-02	H	x	190	N	210	N	14	N	20000	N	780	N
**1,1,1-Trichloroethane	71556	3.50E-02	E	2.86E-01	W	x	790	N	1000	N	47	N	72000	N	2700	N
1,1,2-Trichloroethane	79005	4.00E-03	I			x	0.19	C	0.11	C	0.055	C	100	C	11	C
Trichloroethylene (TCE)	79016	6.00E-03	E			x	1.6	C	1	C	0.29	C	520	C	58	C
Trichlorofluoromethane	75694	3.00E-01	I	2.00E-01	A	x	1300	N	730	N	410	N	610000	N	23000	N
2,4,5-Trichlorophenol	95954	1.00E-01	I			x	3700	N	370	N	140	N	200000	N	7800	N
2,4,6-Trichlorophenol	88062				1.10E-02	I	6.1	C	0.57	C	0.29	C	520	C	58	C
2,4,5-Trichlorophenoxyacetic acid	93765	1.00E-02	I				370	N	37	N	14	N	20000	N	780	N
2-(2,4,5-Trichlorophenoxy)propionic aci	93721	8.00E-03	I				290	N	29	N	11	N	16000	N	630	N
1,1,2-Trichloropropane	598776	5.00E-03	I			x	30	N	18	N	6.8	N	10000	N	390	N
1,2,3-Trichloropropane	96184	6.00E-03	I			x	0.0015	C	0.00089	C	0.00045	C	0.82	C	0.091	C
1,2,3-Trichloropropene	96195	5.00E-03	H			x	30	N	18	N	6.8	N	10000	N	390	N
1,1,2-Trichloro-1,2,2-trifluoroethane	76131	3.00E+01	I	8.57E+00	H	x	59000	N	31000	N	41000	N	1000000	N	1000000	N
Tridiphane	58138082	3.00E-03	I				110	N	11	N	4.1	N	6100	N	230	N
Triethylamine	121448			2.00E-03	I		73	N	7.3	N	0		0		0	
Trifluralin	1582098	7.50E-03	I				8.7	C	0.81	C	0.41	C	740	C	83	C
1,2,4-Trimethylbenzene	95636	5.00E-02	E			x	300	N	180	N	68	N	100000	N	3900	N
1,3,5-Trimethylbenzene	108678	5.00E-02	E			x	300	N	180	N	68	N	100000	N	3900	N
Trimethyl phosphate	512561				3.70E-02	H	1.8	C	0.17	C	0.085	C	150	C	17	C
1,3,5-Trinitrobenzene	99354	5.00E-05	I				1.8	N	0.18	N	0.068	N	100	N	3.9	N
Trinitrophenylmethylnitramine	479458	1.00E-02	H				370	N	37	N	14	N	20000	N	780	N
2,4,6-Trinitrotoluene	118967	5.00E-04	I				2.2	C	0.21	C	0.11	C	190	C	21	C
Uranium (soluble salts)	7440611	3.00E-03	I				110	N	11	N	4.1	N	6100	N	230	N
Vanadium	7440622	7.00E-03	H				260	N	26	N	9.5	N	14000	N	550	N
Vanadium pentoxide	1314621	9.00E-03	I				330	N	33	N	12	N	18000	N	700	N
Vanadium sulfate	36907423	2.00E-02	H				730	N	73	N	27	N	41000	N	1600	N

Vernam	1929777	1.00E-03	I					37	N	3.7	N	1.4	N	2000	N	78	N	0	0	
Vinclozolin	50471448	2.50E-02	I					910	N	91	N	34	N	51000	N	2000	N	0	0	
Vinyl acetate	108054	1.00E+00	H	5.71E-02	I			37000	N	210	N	1400	N	1000000	N	78000	N	370	E	
Vinyl bromide	593602			8.57E-04	I			5.2	N	3.1	N	0		0		0		2	N	
Vinyl chloride	75014					1.90E+00	H	3.00E-01	H	x	0.019	C	0.021	C	0.0017	C	3	C	0.002	E
Warfarin	81812	3.00E-04	I					11	N	1.1	N	0.41	N	610	N	23	N	0.046	N	
m-Xylene	1.08E+05	2.00E+00	H	2.00E-01	W			x	1400	N	730	N	2700	N	1000000	N	160000	N	950	S
o-Xylene	9.55E+04	2.00E+00	H	2.00E-01	W			x	1400	N	730	N	2700	N	1000000	N	160000	N	730	S
p-Xylene	1.06E+05			8.57E-02	W			x	520	N	310	N	0		0		0		1000	S
Xylene (mixed)	1.33E+06	2.00E+00	I					x	12000	N	7300	N	2700	N	1000000	N	160000	N	320	E
Zinc	7.44E+06	3.00E-01	I					11000	N	1100	N	410	N	610000	N	23000	N	0		
Zinc phosphide	1.31E+06	3.00E-04	I					11	N	1.1	N	0.41	N	610	N	23	N	0		
Zineb	1.21E+07	5.00E-02	I					1800	N	180	N	68	N	100000	N	3900	N	0		

Corrective Action Plan for Roswell Compressor Station Surface Impoundments

Appendix E: DBS&A Standard Operating Procedures

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Section 13.3.1

Drilling Operations



1. PURPOSE

The following provides standard operating guidelines (SOGs) for drilling programs.

2. SCOPE

The SOGs included in this section are applicable to all DBS&A employees and its contractors and subcontractors for the conduct of all drilling activities described in this section. The scope of the guidelines described in this section includes the following topics:

- Drilling Methods
- Drilling Fluids
- Drilling Equipment
- Procedures to Follow During Drilling Programs

Standards for drilling methods and fluids are described in ASTM D 5092-90 ("Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers"). Refer to Driscoll (1986), EPA (September 1986) or Aller et al. (1989) for more detailed guidelines about the above subjects as they relate to the drilling of monitor and extraction wells and borings. Site-specific work plans or sampling plans should identify any special needs or circumstances beyond those described in this SOG.

3. GUIDELINES

3.1 Drilling Methods (ASTM D 5092-90)

The drilling method required to create a stable, open, vertical borehole for drilling a borehole or installation of a monitor or extraction well shall be selected according to the site geology, the site hydrology, and the intended use of the data. Tables 13.3.1-1 and 13.3.1-2 list common drilling methods and will aid in the selection of an appropriate drilling method. Table 13.3.1-1 lists the advantages and disadvantages of the different types of drilling methods. Table 13.3.1-2 assesses the performance of different drilling methods in various types of geologic formations.

3.2 Drilling Fluids (ASTM D 5092-90)

Whenever feasible, drilling procedures should be used that do not require the introduction of water or drilling fluids into the borehole and that optimize cuttings control at ground surface. Where the use of drilling fluids is unavoidable, the selected fluid should have as little impact as possible on the water samples for the constituents of interest. In addition, care should be taken to remove as much drilling fluid as possible from the well and the aquifer during the well development process (see Section 13.4.3). If an air compressor is used, it should be equipped with an oil air filter or oil trap.

Water-based drilling fluids are preferred if drilling fluids are needed for the drilling of monitor and extraction wells and borings. Water-based drilling fluids have the least influence on the ground-



water quality in the area of drilling. However, potential problems created by the use of water-based drilling fluids need to be kept in mind. These problems include: (1) fluid infiltration/flushing of the intended monitoring zone; (2) well development difficulties (particularly where an artificial filter pack has been installed); (3) chemical, biological and physical reactivity of the drilling fluid with indigenous fluids in the ground; and (4) introduction of halomethanes into the ground water.

3.2.1 Drilling Fluid Properties

The drilling subcontractor is responsible for checking and adjusting the properties (weight and viscosity) of the drilling fluid. The proper weight of the drilling fluid is needed to maintain stability of the borehole, and the proper viscosity controls the ability of the drilling fluid to remove cuttings from the borehole. However, the DBS&A Technical Representative should always make sure that the drilling contractor periodically checks the properties of the drilling fluid.

One simple and common way to measure the viscosity of the drilling fluid is a Marsh Funnel. With the use of a Marsh Funnel, a known volume of drilling fluid is allowed to drain from a special funnel into a cup; the flow time is recorded and calibrated against the time required for an equal volume of water to drain from the funnel [approx. 26 seconds @ 70° F (21.1° C)].

Table 13.3.1-3 describes typical additive concentrations, resulting viscosities, and required uphole velocities for major types of drilling fluids used in various aquifer materials. Table 13.3.1-4 charts drilling fluid weight adjustments with barite or water.

3.2.2 Guidelines for Solving Specific Drilling Fluid Problems (Driscoll, 1986)

The drilling subcontractor is responsible for any drilling fluid problems. However, the DBS&A Technical Representative and Field Representative should be aware of and recognize the problems that may arise. Below are some guidelines for solving specific drilling fluid problems which may be helpful to the DBS&A Technical Representative:

PROBLEM: Inadequate cuttings have been removed from the borehole.

RECOMMENDED ACTION:

1. Clays and polymeric solids in potable water
 - a. Increase uphole velocity of the drilling fluid.
 - b. Increase viscosity of the drilling fluid by adding more colloidal material.
 - c. Increase density of the drilling fluid by adding weighting material (Tables 13.3.1-3 and 13.3.1-4).
 - d. Reduce penetration rate to limit cuttings load.
2. Air
 - a. Increase uphole velocity of fluid system by adding air or water.
 - b. Add surfactant to produce foam or to increase concentration of surfactant.
 - c. Decrease air injection rate if air is breaking through the foam mix and preventing formation of stable foam.



- d. Decrease water content of the foam system.

PROBLEM: The rate at which cuttings will drop out is too low because the inadvertent addition of native clays during drilling has produced excessive viscosity in the drilling fluid.

RECOMMENDED ACTION:

1. Add potable water to dilute the drilling fluid (Table 13.3.1-4).
2. Add commercial thinner to reduce the attractive forces between clay colloids.
3. If using clay additives, convert to a polymeric system.
4. Separate the solids from a clay-additive system with a shale shaker or shale shakers and desanders connected in series. A shale shaker or desander may be unnecessary when a polymeric system is being used.
5. Redesign or clean the pit system to increase rate of cuttings settlement.

PROBLEM: Gel strength becomes too great because of strong flocculation, high concentration of solids, or contamination from evaporite deposits or cement. (Excessive gel-strength problems do not occur with polymeric colloids.)

RECOMMENDED ACTION:

1. Add potable water to dilute the drilling fluid.
2. Add polyphosphate or commercial thinner to reduce electrical charges between clay colloids.
3. Use desander or shale shaker to remove solids from a clay-additive system.
4. Lower the pH.

PROBLEM: Excessive fluid loss into the formation causes thick filter cakes that can produce tight places in the hole, development problems, formation (clay) sloughing, and misinterpretation of electric or gamma-ray logs.

RECOMMENDED ACTION:

1. Increase viscosity by adding bentonite or polymeric colloids to any water-based system.
2. Add commercial viscosifiers such as CMC or HEC.
3. Reduce density of the drilling fluid.
4. Prevent drastic changes in downhole pressures and maintain downhole pressures at a minimum. Suggestions include (Bariod):
 - a. Raise and lower the drill string slowly.
 - b. Drill through any tight section; do not spud.
 - c. Begin rotation of the drill pipe, and then start the pump at a low rate and gradually increase the rate.
 - d. Operate the pump at the lowest rate that will assure adequate cooling of the bit and removal of cuttings from the bit face.



- e. Prevent balling at the bit; do not drill soft formations so fast that the annulus becomes overloaded and pressure builds up.

PROBLEM: Lost circulation in permeable formations, faulted and jointed rock, solution cavities in dolomite and limestone, or fractures created by excessive borehole pressures in semiconsolidated or well consolidated rock can all create problems.

RECOMMENDED ACTION:

1. Reduce the density of the drilling fluid system.
2. Switch from a clay-additive drilling fluid system to an air-foam fluid, or add surfactant to a dry-air system.
3. Gel natural polymeric fluids at the point of fluid loss.
4. Use commercial sealing materials.
5. Drill remainder of the hole with a cable tool rig.
6. Case off, then resume rotary drilling.
7. Fill the borehole with clean sand to the point above lost circulation. Let the material stand in borehole overnight. Resume drilling, using low pump pressure.

PROBLEM: Confined pressures in the formation can contribute to a problem.

RECOMMENDED ACTION:

1. Increase density by adding heavy mineral additives such as barite to drilling fluid systems made with clay additives (Table 13.3.1-4). To suspend barite, the minimum Marsh funnel viscosity must equal four times the final (desired) drilling fluid weight (in lb/gal).
2. Increase density by adding a salt solution to polymeric drilling fluid systems.

PROBLEM: Hydration (swelling and dispersion), pore pressures, and overburden pressure can cause shale sloughing.

RECOMMENDED ACTION:

1. Use polymeric additive to isolate water from shale.
2. Maintain constant fluid pressures in the borehole.
3. Minimize uphole velocities.
4. Avoid pressure surges caused by raising or lowering drill rods rapidly.
5. Add 3 to 4 percent potassium chloride (KCl) to water-based systems.
6. Raise the pH of the drilling fluid to stiffen the clay.

PROBLEM: Contaminants are present. Contaminants usually consist of cement, soluble salts, and gases (hydrogen sulfide and carbon dioxide). Cement in the hole can cause polymeric drilling fluids to break down, thereby increasing fluid losses. Salts may cause drilling fluids with



clay additives to separate into liquid and solid fractions. Gases in water may affect the physical condition of the drilling fluid.

RECOMMENDED ACTION:

1. For cement problems:
 - a. Maintain the pH for natural polymeric drilling fluids at 7 or lower.
 - b. Add commercial chemicals such as sodium acid pyrophosphate to drilling fluids with clay additives to restore original viscosity.
2. For salt problems:
 - a. Change the clay additive from montmorillonite to attapulgite.
 - b. Change to a natural polymeric drilling fluid additive.
3. For gas problems:
 - a. Add a corrosion inhibitor.

PROBLEM: Drilling at air temperatures significantly below freezing, causing freeze-up of the recirculation system.

RECOMMENDED ACTION:

1. Add sodium chloride (NaCl) or calcium chloride (CaCl_2) to a natural polymeric drilling fluid. Salt must not be added to a drilling fluid made with bentonite.

3.3 Drilling Equipment

DBS&A Form Nos. 116 6/93 and 117 6/93, attached to this SOG, are checklists used for the preparation of drilling programs. These two checklists should be used as communication guides between DBS&A and the drilling subcontractor. They should be completed and checked prior to the field stage of the drilling program by both DBS&A and the drilling subcontractor. Form No. 116 6/93 summarizes important phone contacts, length of job, type of rig, underground utility survey, geologic material, sampling, disposal of cuttings, wells and soil borings, grouting, and health and safety issues. Form No. 117 6/93 identifies the drilling equipment and support vehicles that are needed for the drilling program.

3.4 Guidelines to Follow During Drilling Activities

1. A drilling method should be selected that will cause minimal disturbance to the subsurface materials and will not contaminate the subsurface and ground water (40 CFR 265.91(c)).
2. The drilling contractor is responsible for decontaminating the drilling equipment before it is transported onto the project site (ASTM D 5088-90).
3. A decontamination procedure should be followed before use and between borehole locations to prevent cross contamination of wells where contamination has been detected



or is suspected from the site characterization work that precedes the drilling activities (ASTM D 5088-90).

4. The drilling contractor shall be responsible for securing any and all boring or well drilling permits required by state or local authorities and for complying with any and all state or local regulations with regard to the submission of well logs, samples, etc.
5. The drilling contractor shall be responsible for complying with any and all (to include placement) regulations with regard to drilling safety and underground utility detection.
6. Air systems shall not be used for drilling, well installation, well development, or sampling without prior approval by the Project Manager. When used, air systems shall include an air line oil filter, frequently replaced, to remove essentially all oil residue from the air compressor. The use of any air system shall be fully described in the drillers log to include equipment description, manufacturer(s), model(s), air pressures used, frequency of oil filter change and evaluation of air line filtering.
7. When air is used as the drilling fluid, shrouds, canopies, blowby lines, or directional pipes should be used to contain and direct the drill cuttings away from the drill crew.
8. Any water that is used during the drilling and installation of a well should be of a known chemical source and verified not to alter or impact the chemistry of the ground water of the operation of the well.
9. When using commercially available mud or additives for the drilling fluid, DBS&A Technical Representatives and Field Representative should make sure that the mud or additives do not alter or affect the chemistry of the ground water or the operation of the well.
10. During rotary drilling, the use of portable recirculation tanks is required. No dug sumps (lined or unlined) are allowed without prior approval by the Project Manager.
11. No dyes, tracers, or other substances shall be used or otherwise introduced into borings, wells, lysimeters, grout, backfill, ground water, or surface water unless specifically approved by the Technical Project Manager.
12. For wells over 100-feet deep, plumbness and alignment should be checked at preselected intervals during the drilling of the boreholes by the driller and verified by the DBS&A Field Representative.
13. Any contaminated materials (soil and/or water) should be collected and disposed of in an approved waste disposal container or facility.
14. Soil descriptions, collection of samples, field monitoring, and other pertinent information shall be recorded on the Boring Log Form during drilling operations. The Boring Log



Form, soil logging procedures, and instructions for completing the Boring Log Form are included in Section 13.3.2 of the Operations Manual

4. ATTACHMENTS

- Table 13.3.1-1, Drilling Methods for Monitor Wells
- Table 13.3.1-2, Relative Performance of Different Drilling Methods in Various Types of Geologic Formations
- Table 13.3.1-3, Typical Additive Concentrations, Resulting Viscosities, and Required Uphole Velocities for Major Types of Drilling Fluids Used in Various Aquifer Materials
- Table 13.3.1-4, Drilling Fluid Weight Adjustment with Barite or Water
- Drilling Information Checklist (DBS&A Form No. 116)
- Drilling Equipment and Support Vehicle Checklist (DBS&A Form No. 117)

5. REFERENCES

Aller, L., T.W. Bennett, G. Hackett, R.J. Petty, J.H. Lehr, H. Sedoris, D.M. Nielson, and J.E. Denne. 1989. Handbook of Suggested Practices for the Design and Installation of Ground-Water Monitoring Well Design and Installation. National Well Water Association. Dublin, OH. 398 p.

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**Table 13.3.1-1 Drilling Methods for Monitor Wells**

Type	Advantages	Disadvantages
Hollow-stem auger	<ul style="list-style-type: none">• No drilling fluid is used, eliminating contamination by drilling fluid additives• Formation waters can be sampled during drilling by using a screened auger or advancing a well point ahead of the augers• Formation samples taken by split-spoon or core-barrel methods are highly accurate• Natural gamma-ray logging can be done inside the augers• Hole caving can be overcome by setting the screen and casing before the augers are removed• Fast• Rigs are highly mobile and can reach most drilling sites• Usually less expensive than rotary or cable tool drilling	<ul style="list-style-type: none">• Can be used only in unconsolidated materials• Limited to depths of 100 to 150 ft (30.5 to 45.7 m)• Possible problems in controlling heaving sands• May not be able to run a complete suite of geophysical logs
Direct rotary	<ul style="list-style-type: none">• Can be used in both unconsolidated and consolidated formations• Capable of drilling to any depth• Core samples can be collected• A complete suite of geophysical logs can be obtained in the open hole• Casing is not required during drilling• Many options for well construction• Fast• Smaller rigs can reach most drilling sites• Relatively inexpensive	<ul style="list-style-type: none">• Drilling fluid is required and contaminants are circulated with the fluid• Drilling fluid mixes with the formation water and invades the formation and is sometimes difficult to remove• Bentonitic fluids may absorb metals and may interfere with other parameters• Organic fluids may interfere with bacterial analyses and/or organic-related parameters• During drilling, no information can be obtained on the location of the water table and only limited information on water-producing zones• Formation samples may not be accurate



Table 13.3.1-1 Drilling Methods for Monitor Wells (continued)

Type	Advantages	Disadvantages
Air rotary	<ul style="list-style-type: none">• No water-based drilling fluid is used, eliminating contamination by additives• Can be used in both unconsolidated and consolidated formations• Capable of drilling to any depth• Formation sampling is excellent in hard, dry formations• Formation water blown out of the hole makes it possible to determine when the first water-bearing zone is encountered• Field analysis of water blown from the hole can provide information regarding changes for some basic water-quality parameters such as chlorides• Fast	<ul style="list-style-type: none">• Casing is required to keep the hole open when drilling in soft, caving formations below the water table• When more than one water-bearing zone is encountered and hydrostatic pressures are different, flow between zones occurs during the time drilling is being completed and before the borehole can be cased and grouted properly• Relatively more expensive than other methods• May not be economical for small jobs
Cable Tool	<ul style="list-style-type: none">• Only small amounts of drilling fluid are required (generally water with no additives)• Can be used in both unconsolidated and consolidated formations; well suited for extremely permeable formations• Can drill to depths required for most monitoring wells• Highly representative formation samples can be obtained by an experienced driller• Changes in water level can be observed• Relative permeabilities for different zones can be determined by skilled drillers• A good seal between casing and formation is virtually assured if flush-jointed casing is used• Rigs can reach most drilling sites• Relatively inexpensive	<ul style="list-style-type: none">• Minimum casing size is 4 in (102 mm)• Steel casing must be used• Cannot run a complete suite of geophysical logs• Usually a screen must be set before a water sample can be taken• Slow

(After Driscoll, 1987)

**Table 13.3.1-2 Relative Performance of Different Drilling Methods in Various Types of Geologic Formations**

Type of Formation	Cable Tool	Direct Rotary (with fluids)	Direct Rotary (with air)	Direct Rotary (Down-the-hole air hammer)	Direct Rotary (Drill-through casing hammer)	Reverse Rotary (with fluids)	Reverse Rotary (Dual Wall)	Hydraulic Percussion	Jetting	Driven	Auger
Dune sand	2	5	NR	NR	6	5*	6	5	5	3	1
Loose sand and gravel	2	5	NR	NR	6	5*	6	5	5	3	1
Quicksand	2	5	NR	NR	6	5*	6	5	5	NR	1
Loose boulders in alluvial fans or glacial drift	3-2	2-1	NR	NR	5	2-1	4	1	1	NR	1
Clay and silt	3	5	NR	NR	5	5	5	3	3	NR	3
Firm shale	5	5	NR	NR	5	5	5	3	NR	NR	2
Sticky shale	3	5	NR	NR	5	3	5	3	NR	NR	2
Brittle shale	5	5	NR	NR	5	5	5	3	NR	NR	NA
Sandstone-poorly cemented	3	4	NR	NR	NA	4	5	4	NR	NR	NA

*Assuming sufficient hydrostatic pressure is available to contain active sand (under high confining pressures)

NR = Not recommended

NA = Not applicable

Rate of Penetration:

1 Impossible	4 Medium
2 Difficult	5 Rapid
3 Slow	6 Very rapid

(After Driscoll, 1987)



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Table 13.3.1-2 Relative Performance of Different Drilling Methods in Various Types of Geologic Formations (continued)

Type of Formation	Cable Tool	Direct Rotary (with fluids)	Direct Rotary (with air)	Direct Rotary (Down-the-hole air hammer)	Direct Rotary (Drill-through casing hammer)	Reverse Rotary (with fluids)	Reverse Rotary (Dual Wall)	Hydraulic Percussion	Jetting	Driven	Auger
Sandstone-well cemented	3	3	5	NR	NA	3	5	3	NR	NR	NA
Chert nodules	5	3	3	NR	NA	3	3	5	NR	NR	NA
Limestone	5	5	5	6	NA	5	5	5	NR	NR	NA
Limestone with chert nodules	5	3	5	6	NA	3	3	5	NR	NR	NA
Limestone with small cracks or fractures	5	3	5	6	NA	2	5	5	NR	NR	NA
Limestone, cavernous	5	3-1	2	5	NA	1	5	1	NR	NR	NA
Dolomite	5	5	5	6	NA	5	5	5	NR	NR	NA

*Assuming sufficient hydrostatic pressure is available to contain active sand (under high confining pressures)

NR = Not recommended
NA = Not applicable

Rate of Penetration:

- | | |
|--------------|--------------|
| 1 Impossible | 4 Medium |
| 2 Difficult | 5 Rapid |
| 3 Slow | 6 Very rapid |

(After Driscoll, 1987)



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Table 13.3.1-2 Relative Performance of Different Drilling Methods in Various Types of Geologic Formations (continued)

Type of Formation	Cable Tool	Direct Rotary (with fluids)	Direct Rotary (with air)	Direct Rotary (Down-the-hole air hammer)	Direct Rotary (Drill-through casing hammer)	Reverse Rotary (with fluids)	Reverse Rotary (Dual Wall)	Hydraulic Percussion	Jetting	Driven	Auger
Basalts, thin layers in sedimentary rocks	5	3	5	6	NA	3	5	5	NR	NR	NA
Basalts-thick layers	3	3	4	5	NA	3	4	3	NR	NR	NA
Basalts-highly fractured (lost circulation zones)	3	1	3	3	NA	1	4	1	NR	NR	NA
Metamorphic rocks	3	3	4	5	NA	3	4	3	NR	NR	NA
Granite	3	3	5	5	NA	3	4	3	NR	NR	NA

*Assuming sufficient hydrostatic pressure is available to contain active sand (under high confining pressures)

NR = Not recommended
NA = Not applicable

Rate of Penetration:
1 Impossible
2 Difficult
3 Slow
4 Medium
5 Rapid
6 Very rapid

(After Driscoll, 1987)

**Table 13.3.1-3 Typical Additive Concentrations, Resulting Viscosities, and Required Uphole Velocities for Major Types of Drilling Fluids Used in Various Aquifer Materials**

Base Fluid	Additive/Concentration	Marsh Funnel Viscosity (seconds)	Annular Uphole Velocity (ft/min)	Observations
Water	None	26 ± 0.5	100 - 120	For normal drilling (sand, silt, and clay)
Water	Clay (High-Grade Bentonite)			Increases viscosity (lifting capacity) of water significantly
	15-25 lb/100 gal	35 - 55	80 - 120	For normal drilling conditions (sand, silt, and clay)
	25-40 lb/100 gal	55 - 70	80 - 120	For gravel and other coarse-grained, poorly consolidated formations
	35-45 lb/100 gal	65 - 75	80 - 120	For excessive fluid losses
Water	Polymer (Natural)			Increases viscosity (lifting capacity) of water significantly
	4.0 lb/100 gal	35 - 55	80 - 120	For normal drilling conditions (sand, silt, and clay)
	6.1 lb/100 gal	65 - 75	80 - 120	For gravel and other coarse-grained, poorly consolidated formations
	6.5 lb/100 gal	75 - 85	80 - 120	For excessive fluid losses Cuttings should be removed from the annulus before the pump is shut down, because polymeric drilling fluids have very little gel strength
Air	None	N/A	3,000-5,000	Fast drilling and adequate cleaning of medium to fine cuttings, but may be dust problems at the surface
			4,500-6,000	This range of annular uphole velocities is required for the dual-wall method of drilling
Air	Water (Air Mist) 0.25-2 gpm	N/A	3,000-5,000	Controls dust at the surface and is suitable for formations that have limited entry of water

**Table 13.3.1-3 Typical Additive Concentrations, Resulting Viscosities, and Required Uphole Velocities for Major Types of Drilling Fluids Used in Various Aquifer Materials (continued)**

Base Fluid	Additive/ Concentration	Marsh Funnel Viscosity (seconds)	Annular Uphole Velocity (ft/min)	Observations
Air	Surfactant/Water (Air-Foam)	N/A	50-1,000	Extends the lifting capacity of the compressor
	1-2 qt/100 gal (0.25-0.5% surfactant)			For light drilling; small water inflow; also for sticky clay, wet sand, fine gravel, hard rock; few drilling problems
	2-3 qt/100 gal (0.5-0.75% surfactant)			For average drilling conditions; larger diameter, deeper holes; large cuttings; increasing volumes of water inflow; excellent hole cleaning
Air	3-4 qt/100 gal (0.75-1% surfactant)	N/A	50-100	For difficult drilling; deep, large-diameter holes; large, heavy cuttings; sticky and incompetent formations; large water inflows
				Injection rates of surfactant/water mixture: Unconsolidated formations 3-10 gpm Fractured rock 3-7 gpm Solid rock 3-5 gpm
	Surfactant/Colloids/Water (Stiff Foam)			Greatly extends lifting capacity of the compressor
Air	3-5 qt/100 gal (0.75-1% surfactant) plus 3-6 lb polymer/100 gal or 30-50 lb bentonite/100 gal	N/A	50-100	For difficult drilling; deep, large-diameter holes; large, heavy cuttings; sticky and incompetent formations; large water inflows
	4-8 qt/100 gal (1-2% surfactant) plus 3-6 lb polymer/100 gal or 30-50 lb bentonite/100 gal			For extremely difficult drilling; large, deep holes; lost circulation; incompetent formations; excessive water inflows

(Compiled by Driscoll, 1984)



Table 13.3.1-4 Drilling Fluid Weight Adjustment with Barite or Water

Initial drilling fluid weight, lb/gal	Desired drilling fluid weight, lb/gal														
	9.5	10.0	10.5	11.0	11.5	12.0	12.5	13.0	13.5	1.0	14.5	15.0			
9.0	69	140	214	293	371	457	545	638	733	833	940	1050			
9.5		69	143	219	298	381	467	557	650	750	855	964			
10.0	43		71	145	221	305	390	479	569	667	769	876			
10.5	85	30		74	148	229	312	398	488	583	683	788			
11.0	128	60	23		74	152	233	319	407	500	598	700			
11.5	171	90	46	19		76	157	240	326	417	512	614			
12.0	214	120	69	37	16		79	160	245	333	426	526			
12.5	256	150	92	56	32	14		81	162	250	343	438			
13.0	299	180	115	75	48	27	12		81	167	257	350			
13.5	342	210	138	94	63	41	24	11		83	171	264			
14.0	385	240	161	112	78	54	36	21	10		86	176			
14.5	427	270	185	131	95	68	48	32	19	9		88			
15.0	470	300	208	150	110	82	60	43	29	18	8				

The lower left half of this table shows the number of gallons of water which must be added to 100 gal of drilling fluid to produce desired weight reductions. To use this portion of the table, locate the initial drilling fluid weight in the vertical column at the left, then locate the desired drilling fluid weight in the upper horizontal row. The number of gal of water to be added per 100 gal of drilling fluid is read directly across from the initial weight and directly below the desired weight. For example, to reduce an 11 lb/gal drilling fluid to a 9.5 lb/gal drilling fluid, 128 gal of water must be added for every 100 gal of drilling fluid in the system.

The upper right half of this table shows the number of pounds of barite which must be added to 100 gal of drilling fluid to produce desired weight increases. To use this portion of the table, locate the initial drilling fluid weight in the vertical column to the left, then locate the desired drilling fluid weight in the upper horizontal row. The number of pounds of barite to be added per 100 gal of drilling fluid is read directly across from the initial weight and directly below the desired weight. For example, to raise a 9 lb/gal drilling fluid to 10 lb/gal, 140 lb of barite must be added per 100 gal of drilling fluid in the system.

(After Petroleum Extension Service, 1969)



DANIEL B. STEPHENS & ASSOCIATES, INC.

Drilling Information Checklist

Project No. _____ DBS&A Project Manager _____

DBS&A Technical Representative _____ DBS&A Field Representative(s) _____

Drilling Company _____

Drilling Company Contact _____ Phone No. _____

Date and Time for Work to Begin _____

Estimated Work Days to Complete Job _____ Access Agreements _____

Drilling Rig _____ Driller and Assistant(s) _____

☐ Hollow Stem Auger ☐ Air/Mud Rotary ☐ Cable Tool ☐ Dual-Tube Air Percussion ☐ Coring Rig

Blu-Stake (NM call 1-800-321-2537 for most utilities) Contacted By _____

One Week Authorization No. _____ Date. _____

Underdetection Services (Private Co.) _____

Client Contact _____ Phone No. _____

Job Site _____ Phone No. _____

Location _____

Surface ☐ Asphalt ☐ Concrete ☐ Dirt ☐ In Roadway

Geologic Material _____

Sampling Device ☐ Splitspoon ☐ Thin-walled Tube ☐ 140 lb. Hammer (SPT) ☐ Coring

Sampling Length ☐ 12" ☐ 18" ☐ 24" With Rings ☐ 3" ☐ 6"

Sampling Interval(s) _____

Disposal of Cuttings ☐ Drummed ☐ Leave On-site

Contain Decontamination Water _____

Hole Diameter	No. of Borings	Total Footage	Maximum Depth	
Well Diameter	No. of Wells	Total Footage	Depth to Water	Screen Length/Slot Size

Grouting ☐ Place Bentonite Seal ☐ Grout to Surface ☐ Backfill

Mixed On-site by Drilling Co. _____ Cement Truck Delivers Grout _____

Poured from Surface Through Drill Pipe _____

Pumped Through Tremie Pipe _____

Water On-site ☐ Yes ☐ No Electricity ☐ Yes ☐ No

Level of Protection ☐ A ☐ B ☐ C ☐ D Health & Safety Plan By _____

Potential Contaminants _____ Other Hazards _____



DANIEL B. STEPHENS & ASSOCIATES, INC.

Drilling Equipment and Support Vehicle Checklist

Project No. _____ DBS&A Project Manager _____

DBS&A Technical Representative _____ DBS&A Field Representative(s) _____

Drilling Company _____

Drilling Company Contact _____ Phone No. _____

Date and Time for Work to Begin _____

Material	Size	Quantity	Equipment Supplier*
Drill Bit			
Rotary Drilling Pipe			
Hollow Stem Auger (O.D. x I.D: 10"x6.25" or 8"x4.25" + Total Footage)			
Dual-Tube Pipe (O.D. / I.D)			
Water Tank			
Steam Cleaner			
Decontamination Trailer to Contain Water from Steam Cleaning			
Drums			
Tank to Mix Grout			
Tremie Pipe			
Grout Pump			
Wooden Plugs (Flowing Sand)			
Welder			
Concrete Saw (Other Subcontractor)			
Development Rig (Bailers, Surge Block, Pump)			
Plastic Sheeting			
Sampler (Length and Type)			
Core Catchers			
Rings - Brass			
Rings - Stainless Steel			
Endcaps			
Teflon Liners			
Tagline (Length and Type)			

Section 13.3.2

Soils Logging, Sampling, Handling, and Shipping for Geotechnical and Chemical Analyses



Procedure
**Soils Logging, Sampling, Handling, and Shipping
for Geotechnical and Chemical Analyses**

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1. PURPOSE

The following SOP describes the appropriate procedures for the logging, sampling, handling, and shipping of soil during soil boring investigations. Sampling methodologies and shipping requirements are provided for collection of geotechnical, physical, and chemical soil samples.

2. SCOPE

This procedure is applicable to all DBS&A employees and subcontractors who are engaged in soil boring activities. It provides the minimum logging requirements, sampling protocols, and shipping requirements for soil boring investigations. The appropriate form for logging soil is included in this SOP as Attachment 1, Soil Boring Log (DBS&A Form No. 080). A soils classification chart is included as Attachment 2. Tables 13.3.2-1 and 13.3.2-2 provide handling and transport, and volume requirements for soil physical analysis samples, respectively.

3. PROCEDURES

3.1 Soils Logging

Soil descriptions and other pertinent information will be recorded on the Soil Boring Log form during boring operations. The Soil Boring Form contains a header for recording the boring specifics and a log for describing and classifying soil and tracking soil sampling. Soils will be identified and described in accordance with ASTM D 2488, Standard Practice for Description and Identification of Soil (Visual-Manual Practice). Table 13.3.2-3 provides a list of equipment that may be required for soils logging, sampling, handling, and shipping.

3.1.1 Completing the Header

Most of the header is self-explanatory. On the first page of the log, it is important to complete the entire header. If subsequent forms are necessary, complete the page number, the site, the client, the person logging the soil, the boring number, and the date. On the first page, sketch a location map for the boring, referencing it to known features or landmarks. When specifying the drilling method and drill rig, note the diameter of the drill bit or augers.

3.1.2 Completing the Boring Log

PID/FID - record head space measurements made with the PID/FID in this column in the appropriate depth interval from which the sample was collected.

Blow Counts - if driving a split-barrel sampling device with a hammer, record the number of hammer "blows" per 6 inches of penetration. Ensure that the driller marks the 6 inch intervals on the drill stem prior to hammering the split-barrel.



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Sampling Device - specify the sampling device (i.e., split-barrel, split-barrel with brass or stainless steel rings, Shelby tube); specify the inside diameter of the sampling device.

Sample Interval - specify the sampling interval (starting and finishing) by placing an "X" across the appropriate depth interval in this column.

Sample Recovery - state, in tenths of feet, the amount of sample which is recovered.

Sample Number - record the designated sample number in this column.

Depth (Feet) - complete this column in 5-foot intervals to keep a running tally of the depth of the borehole.

USCS Symbol - provide the USCS symbol for the soil to be described; draw a solid contact line at the appropriate depth to signify changes in soil type.

Soil Description - describe the soil in the format listed on the boring log; for non-cohesive soils, estimate the grain distribution, gradation, and grain shape; for cohesive soils, note the plasticity and clay consistency; if possible, a soil classification and geotechnical gauge and a color chart should be used to aid in describing soil.

3.2 Soil Sampling

Soil samples will typically be collected for geotechnical, physical, or chemical analysis. Geotechnical samples will be collected with a split-barrel sampler lined with brass rings or in the case of cohesive soils to be analyzed for compressive strength, a thin-walled tube sampler. Chemical samples will be collected with an unlined split-barrel sampler or a ring-lined split-barrel sampler. Regardless of which sampling device is employed, care should be taken to minimize slough in the borehole. Slow withdrawal of the drill bit prior to sampling will minimize slough. When drilling below the water table, ensure that the water level in the borehole (or within driven casing) is maintained at or above the water table elevation.

3.2.1 Geotechnical/Physical Properties Samples

Geotechnical and/or physical properties samples will be collected with either a ring-lined split-barrel sampler or a thin-walled Shelby tube. If possible, use a ring-lined sampler for physical properties analysis. For triaxial and unconfined compression tests, either a ring-lined sampler or a thin-walled tube sampler may be employed. For cohesive soils, the thin-walled tube sampler should be used for obtaining the least disturbed samples. In non-cohesive soils, a ring-lined sampler is required because of poor sample recovery experienced with a thin-walled sampler.

3.2.1.1 Ring-lined Split-Barrel Sampler (ASTM D 3350)

1. Assemble the sampler with the specified rings. For physical properties analysis, the typical ring is 3 inches in length and constructed of brass. Ring requirements will be specified in the Field Sampling Plan (FSP).



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***Soils Logging, Sampling, Handling, and Shipping
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2. Attach the sampler to the drill stem and carefully lower it to the bottom of the borehole.
3. Hydraulically push the sampler into the soil in a rapid, continuous manner to a length not to exceed that of the sampler. In dense, non-cohesive soils, the sampler may have to be driven. If so, record the blow counts.
4. Carefully disassemble the sampler to minimize soil disturbance. Trim the individual rings flush with a clean knife, and place plastic caps over the ring ends. Use the soil in one of the rings for field classification. Secure the caps with tape and label the ring, including the vertical orientation.
5. The samples can be shipped in a dry cooler. If the possibility exists the samples will be handled roughly, pack them with shipping material in the cooler.

3.2.1.2 Thin-Walled Tube Sampler (ASTM D 1587)

1. Attach the sampling tube to the drill stem and carefully lower to the bottom of the borehole.
2. Rapidly and continuously hydraulically push the Shelby tube a distance of 5 to 10 times the tube diameter in non-cohesive soils and 10 to 15 times the diameter in cohesive soils. In dense, non-cohesive soils it is permissible to drive the sampler. Record the blow counts. It is permissible to "twist" the drill stem to shear the sample bottom prior to retrieval.
3. Carefully withdraw the sampler from the formation to minimize disturbance.
4. The sample can be shipped either unextruded or after extrusion at the site.

Unextruded - Measure the length of the sample in the tube. Remove any slough from the top of the tube. Remove at least 1 inch of soil from the bottom of the tube for field classification. Seal the top and bottom of the tube with plastic caps and secure with tape.

Extruded - Following extrusion, select a 12- to 15-inch segment of the sample which appears least disturbed. Carefully cut the ends with a clean knife, and immediately wrap the sample in cellophane wrap, then aluminum foil. Place the sample in a plastic tube, and cap the ends. Describe the soil with the remainder of the sample. Describe the prepared interval to the extent practicable. **DO NOT** cut or disturb the interval to be submitted to the laboratory.

5. The samples can be shipped in a similar manner as described in 3.2.1.1(5) above.

3.2.2 Soil Chemistry Samples

Soil chemistry samples can be collected with either the split-barrel sampler or with the ring-lined split-barrel sampler. The primary difference in the two methods is the preparation of the samples. In the case of samples obtained from the split-barrel, the soil must be transferred to soil containers (typically glass jars). In the case of the ring-lined sampler, the rings will be either stainless steel or brass which are capped with



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**Soils Logging, Sampling, Handling, and Shipping
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Teflon-lined caps. The rings are labeled, secured with toluene-free tape, and submitted directly for analysis. Exact sample methods, volumes, containers, preservation, and chain of custody procedures will be outlined in the FSP. In general, for soil matrix samples, EPA SW-846 (EPA, 1986) methods will be specified. Both the split barrel sampler and the ring-lined sampler are hydraulically pushed or driven in the same manner described in 3.2.1.1(2-3) above.

3.2.2.1 Split-Barrel Samples (ASTM D 1586)

1. Upon retrieval of the sample, carefully open the split-barrel. Trim the sample with a decontaminated, sharp stainless-steel knife. Note the general soil type.
2. As quickly as possible, collect samples for volatile organic and semi-volatile organic analysis. Be sure that headspace is minimized in the volatile organic analysis samples. Collect field duplicates and specify that the laboratory perform matrix spike/matrix spike duplicates from the same interval as the sample. Place the samples in certified clean glass jars with Teflon-lined caps.
3. Collect samples for other required analyses. If the FSP specifies mixing the split barrel sample prior to filling additional sample containers, do so in a stainless-steel mixing bowl. Sample volumes and containers will be specified in the FSP.
4. Label the samples in accordance with the FSP. At a minimum, this will include: (1) the sample number; (2) boring number and interval (if different from the sample number); (3) time and date; and (4) required analysis. If chain of custody seals are required, secure them across the container lid.
5. Place the sample containers in "ziplock" bags and place on ice. Prior to shipment, the sample containers must be wrapped in bubble-pack, or other suitable packing material.
6. Fully describe the soil sample.
7. Log the sample information in the field log book for later transfer to the Chain-of-Custody Form (DBS&A Form No. 095), which is included as Attachment 3 in this SOP.

3.2.2.2 Ring-Lined Split-Barrel Samples (ASTM D 3350)

1. Upon retrieval of the sampler, carefully open the split-barrel. Trim the ends of the rings with a clean stainless-steel knife. Cap the rings with Teflon-lined caps and seal with toluene-free tape.
2. Using one or more of the rings (if possible), and soil trimmed from the ring ends, describe and log the soil.
3. Follow the steps described in 3.2.2.1(5-7) above. Packing material is optional for the ring samples.



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***Soils Logging, Sampling, Handling, and Shipping
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3.3 Sample Shipment

Proper shipment of samples is critical for ensuring that reliable analytical results are obtained. In the case of geotechnical or physical properties analysis samples, this involves protecting the samples against excessive impacts which may disturb the samples. For soil chemical analyses, it is important to protect the samples from breakage if they were collected in glass jars. In addition, most chemical methods call for the samples being maintained at a constant 4°C.

3.3.1 Geotechnical and Physical Properties Samples

Shipping requirements for geotechnical and physical properties samples are listed in Table 13.3.2-2. In general, samples should be shipped in a dry cooler. If the cooler is not being hand-carried to the laboratory (i.e., shipped by overnight carrier) the samples should be protected with packing material to prevent sample disturbance. Plastic bubble-wrap, shredded paper, foam "peanuts", and vermiculite provide adequate sample protection when properly used. It is important to provide packing materials between all samples, such that samples do not come in contact. When shipping samples, it is important to enclose a chain-of-custody form in the cooler as specified in the FSP.

3.3.2 Soil Chemistry Samples

Soil chemistry samples collected in glass containers must be protected from breakage. Individually wrapping the sample containers in plastic bubble-wrap provides excellent protection. After wrapping the samples in bubble-wrap, they should be placed in sealed "zip-lock" bags. Brass or stainless-steel ring samples need only be placed in sealed "zip-lock" bags. If the FSP calls for chain-of-custody seals to be placed on individual samples, place them across the jar lid or plastic ring cap. Chain-of-custody forms should be filled out in accordance with the FSP, placed in a "ziplock" bag, and taped to the inside of the cooler lid. It is important to use an ample volume of ice in order to maintain the required temperature of 4°C. Chain of custody seals will be placed across the front and back of the cooler lid such that they will be broken in the event of tampering. The cooler lid should be firmly taped shut with several layers of shipping tape encircling the ends of the cooler. Finally, for chemical analyses, *always* ship the samples by overnight carrier.

4.0 REFERENCES

ASTM D 1586-84 Standard Method for Penetration Test and Split-Barrel Sampling of Soils

ASTM D 1587-83 Standard Practice for Thin-Walled Tube Sampling of Soils

ASTM D 2488-90 Practice for Description and Identification of Soils (Visual-Manual)

ASTM D 3350-84 Standard Practice for Ring-Lined Barrel Sampling of Soils

U.S. EPA, 1986, Test Methods for Evaluation of Solid Wastes, SW-846, 3rd Ed.



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**Soils Logging, Sampling, Handling, and Shipping
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5.0 ATTACHMENTS

1. Boring Log (DBS&A Form No. 080 3/92)
2. Unified Soil Classification System Chart (DBS&A Form No. 049)
 - Table 13.3.2-1, Soil Physical Sample Handling and Transport
 - Table 13.3.2-2, Soil Physical Sample Volume Requirements
 - Table 13.3.2-3, Soil Sampling Field Equipment List
3. Chain-of-Custody Form (DBS&A Form No. 95)

Prepared by:

Approved by:

Daniel B. Stephens

Reviewed by:

Quality Assurance Manager

Reviewed by:

Systems Operations Manager



Page ____ of ____

DBS&A Form No. 080 3/92

USCS GROUP SYMBOLS

MAJOR DIVISIONS			GRAPH SYMBOL	LETTER SYMBOL	TYPICAL DESCRIPTIONS
Course Grained Soils More than 50% of Material is Larger than Silt (No. 200 Sieve Size)	Gravel and Gravelly Soils More than 50% of Course Fraction Retained on No. 4 Sieve	Clean Gravels (little or no fines <5%)		GW	Well-graded gravels, gravel-sand mixtures. Little or no fines.
				GP	Poorly-graded gravels, Gravel-sand mixtures. Little or no fines.
		Gravels with Fines (appreciable amount of fines >15%)		GM	Silty gravels. Gravel-sand-silt mixtures.
				GC	Clayey gravels. Gravel-sand-clay mixtures.
	Sand and Sandy Soils More than 50% of Course Fraction Passing No. 4 Sieve	Clean Sand (little or no fines <5%)		SW	Well-graded sands. Gravelly sands. Little or no fines.
				SP	Poorly-graded sands. Gravelly sands. Little or no fines.
		Sands with Fines (appreciable amount of fines >15%)		SM	Silty sands. Sand-silt mixtures.
				SC	Clayey sands. Sand-clay mixtures.
Fine Grained Soils More than 50% of Material is Smaller than Silt (No. 200 Sieve Size)	Silts and Clays Liquid Limit Less than 50			ML	Inorganic silts and very fine sands. Rock flour. Silty or clayey fine sands or clayey silts with slight plasticity.
				CL	Inorganic clays of low to medium plasticity. Gravelly clays. Sandy clays, silty clays, lean clays.
				OL	Organic silts and organic silty clays or low plasticity.
	Silts and Clays Liquid Limit Greater than 50			MH	Inorganic silts. Micaceous or diatomaceous fine sand or silty soils.
				CH	Inorganic clays of high plasticity. Fat clays.
				OH	Organic clays of medium to high plasticity. Organic silts.
Highly Organic				PT	Peat, humus, swamp soils with high organic content.



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TABLE 13.3.2-1. SOIL PHYSICAL ANALYSIS SAMPLE REQUIREMENTS AND TRANSPORT

PHYSICAL PROPERTY TEST	SAMPLE REQUIREMENT	SHIPPING REQUIREMENT
Soil Moisture	2.5" O.D. x 3" long ring or in double plastic bag with air removed	Dry cooler
Hydraulic Conductivity	2.5" O.D. x 3" sealed ring	Dry cooler
Moisture Retention (Ψ - Θ)	2.5" O.D. x 3" sealed ring	Dry cooler with packing material
Air Permeability	2.5" O.D. x 3" sealed ring	Dry cooler with packing material
Bulk Density	2.5" O.D. x 3" sealed or waxed ring	Dry cooler with packing material
Porosity	2.5" O.D. x 3" sealed ring	Dry cooler with packing material
Specific Gravity	2.5" O.D. x 3" sealed ring or plastic bag for bulk sample	Dry cooler
Particle Size	2.5" O.D. x 3" sealed ring; plastic bag for gravelly soil	Dry cooler
Atterberg Limits	2.5" O.D. x 3" sealed ring or plastic bag	Dry cooler preferred
Proctor Tests	5 gallon plastic bucket or large plastic bags	No shipping requirements
Compression Tests	Unextruded in thin-walled tube; extruded wrapped in cellophane wrap and placed in plastic tube; or 2.5" O.D. x 6" sealed ring	Dry cooler with packing material

TABLE 13.3.2-2. SOIL PHYSICAL SAMPLE VOLUME REQUIREMENTS

PRIMARY TEST REQUESTED													
SAMPLE REQUIREMENTS FOR ADDITIONAL TESTS		Moisture Content (volumetric)	Hydraulic Conductivity K_{sat}	Hydraulic Conductivity K_{unsat}	Moisture Retention $\Psi - \Theta$	Air Permeability K_{air}	Bulk Density	Porosity (Calculated)	Porosity (Air Pycnometer)	Particle Density	Particle Size Analysis	Atterberg Limits	Compaction (Proctor) Test
	Moisture Content (Volumetric)		Same Sample	(3) Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Hydraulic Conductivity	Same Sample		(3) Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Hydraulic Conductivity	(3) Same Sample	Same Sample		Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Moisture Retention	Same Sample	Same Sample	(3) Same Sample		Same Sample	Same Sample	Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Air Permeability	Same Sample	Same Sample	(4) Same Sample	Same Sample		Same Sample	Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Bulk Density	Same Sample	Same Sample	(4) Same Sample	Same Sample	Same Sample		(5) Same Sample	Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Porosity (Calculated)	Same Sample	Same Sample	(4) Same Sample	Same Sample	Same Sample	Same Sample		Same Sample	(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Porosity (Air)	Same Sample	Same Sample	(4) Same Sample	Same Sample	Same Sample	Same Sample	Same Sample		(1) Same Sample	(1) Same Sample	Extra Sample	Extra Sample
	Particle Density	Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	Same Sample	(6) Same Sample	Same Sample		Same Sample	Same Sample	Extra Sample
	Particle Size Analysis	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample	(2) Extra Sample		Extra Sample	Extra Sample
	Atterberg Limits	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Same Sample	Extra Sample		Extra Sample
	Compaction (Proctor)	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	Extra Sample	

- (1) Same sample may be run for this additional test provided sample is in a sample ring and meets the sample size requirements for the additional test.
- (2) Same sample may be used if sample meets sample size requirements for additional test (is there sufficient sample; usually only fine-grained samples will meet this requirement).
- (3) Required for all unsaturated hydraulic conductivity calculations except column imbibition method.
- (4) Same sample may be used except for column imbibition test.
- (5) Additional test required to perform calculations of primary test.
- (6) Additional test preferred for best results of primary test.

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TABLE 13.3.2-3. SOIL SAMPLING FIELD EQUIPMENT LIST

ITEM	DESCRIPTION
1. Soil Kit	Geologic hammer Electrical and solvent-free tape Flagging tape Assorted sharpies Munsel Soil Color Chart Grain size chart USCS Soil Classification Guide Carpenter's rule (6 feet marked in tenths) Spatulas Dilute Hydrochloride acid
2. Boring Log forms and clip board	
3. Field book	
4. Meters:	Photoionization Detector MX25 explosivity meter Water level meter Flame Ionization Detector or methane meter Geiger-Mueller radiation meter
5. Tagline:	Fiberglass with weight taped OR Steel tape with steel weight and no tape to attach weight
6. 300-foot fiberglass tape	
7. Latex gloves (2 or more boxes)	
8. Health and Safety kits:	Earplugs Hard hat Steel-toed boots Safety glasses Tyvek, Respirator
9. Coolers:	One for food only 3 or more for samples



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TABLE 13.3.2-3. SOILS SAMPLING FIELD EQUIPMENT LIST (CONTINUED)

ITEM	DESCRIPTION
10. Decontamination:	3 plastic tubs Plastic brushes Liquinox Distilled water, 10-15 gallons minimum Paper towels Garbage bags (large/small)
11. Soil sample containers:	Brass rings (for soil physical properties) Stainless steel rings (for organic chem analyses) Teflon liners (for organic chem analyses) Plastic endcaps Sealing tape and/or purifier wax Glass jars (4 or 8 oz for chemical analyses) Quart and gallon ziplock bags



DANIEL B. STEPHENS & ASSOCIATES, INC.

Chain of Custody

To:

_____ Date _____ Project No. _____

_____ Client _____

_____ Relinquished by _____

Sent by: ☐ Fed Ex ☐ DHL ☐ Other _____

Purpose of Shipment _____

Possible Contaminants _____

Item No.	Sample No.	Analysis to be Done	Sample Container	Comments

Date Received _____ by _____

Company Representative

Received the above articles in good condition

Except as noted _____

Section 13.4

Well Design, Installation, and Abandonment

**Well Design, Installation, and Abandonment**

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SECTION 13.4

1. PURPOSE

This section provides standard operating procedures (SOPs) and standard operating guidelines (SOGs) for the design, installation, and abandonment of wells.

2. SCOPE

The SOPs and SOGs included in this section are applicable to all DBS&A employees, and its contractors and subcontractors, for the conduct of all activities listed in this section. **All SOPs and SOGs described in this section are proprietary in nature and shall not be copied or reproduced, or distributed to any person or organization not employed by DBS&A, without the expressed written approval of the Systems Operations Manager or President of DBS&A.** The scope of the procedures described in this section include the following:

- 13.4.1 Monitor Well Design and Installation
- 13.4.2 Extraction Well Design and Installation
- 13.4.3 Well Development
- 13.4.4 Well and Boring Abandonment
- 13.4.5 Well Grouting

3. PROCEDURES

These SOPs and SOGs shall be reviewed and updated at least once annually by the Systems Operations Manager (SOM), or person(s) designated by the SOM. Revisions and additions to these SOPs and SOGs shall be made as needed to assure consistency with industry standards and the collection of high quality data in the field. Requests for revisions shall be made on Form No. 127 in accordance with the procedure described in Section 0.2 of the DBS&A Operations Manual. Form No. 043 of Section 2.2 shall be used in requesting, authorizing, and documenting any SOP/SOG, or part of any SOP/SOG, copied or distributed for uses described in Section 13.4 of the Operations Manual. All or parts of the SOPs/SOGs described in this section may be reproduced and used in DBS&A reports, proposals, and work plans with the verbal consent of either the SOM or President of DBS&A. The SOM shall be responsible for filing and maintaining requests made on Form Nos. 127 and 043.

Prepared by:

Approved by:

Daniel B. Stephens

Reviewed by:

Quality Assurance Manager

Reviewed by:

Systems Operations Manager

Section 13.4.1

Monitor Well Design and Installation



1. PURPOSE

This section provides standard operating guidelines (SOGs) for monitor well design and installation.

2. SCOPE

The SOGs included in this section are applicable to all DBS&A employees, and its contractors and subcontractors, for the conduct of all activities listed in this section. This procedure is applicable to all DBS&A employees and subcontractors who are engaged in monitor well design and installation activities. Tables 13.4.1-1 and 13.4.1-2 will aid in the selection of casing, screen and riser materials and bentonite or cement grouting materials. Figures 13.4.1-1 and 13.4.1-2 are respectively diagrams for typical shallow zone (single-cased) and deep zone (multi-cased) wells used at DBS&A. Attachment 1 to this SOG is a material supply list (Form No. 118, 6/93) and should be used in the preparation of monitor well design and installation activities. Also, a well completion record (Form No. 048) included as Attachment 2, which will be used to record well design and installation information in the field. The scope of the procedures described in this section include the following:

- Initial Site Characterization
- Monitor Well Design
- Monitor Well Installation

Standards for monitor well design and installation are described in ASTM D 5092-90 ("Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers"). Also, DBS&A technical representatives are required to follow all applicable state regulations pertaining to monitor well design and installation. Refer to Driscoll (1986), EPA (September 1986) or Aller et. al. (1989) for more detailed guidelines about the above subjects as they relate to the design and installation of monitor wells.

3. GUIDELINES

3.1 Initial Site Characterization (ASTM D 5092-90)

A conceptual hydrogeologic model that identifies potential flow paths and the target monitoring zone(s) should be developed prior to monitor well design and installation. The following steps for initial site characterization are recommended:

1. Conduct an initial visit to identify and locate aquifers and zones with the greatest potential to contain and transmit ground water and contaminants from the project area and study exposed soil and rocks within or near the project area for soil color and textural changes, landslides, faults, seeps, and springs.
2. Collect and review literature from previous investigations of the project area (i.e. topographic maps, aerial imagery, site ownership and utilization records, geologic and hydrogeologic maps



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and reports, mineral resource surveys, water well logs, and personal information from local well drillers).

3. Develop a preliminary conceptual model of the project area using the information gathered during the initial site visit and literature search. Target specific aquifers and/or ground-water zones for additional characterization based on the known hydrogeology and potential contaminant characteristics (e.g., screen across water table for LNAPLs; include a sump for DNAPLs).

3.2 Monitor Well Materials and Design (ASTM D 5092-90)

The following materials and design are for typical shallow zone (single-cased) and deep zone (multi-cased) wells. Figure 13.4.1-1 is a diagram showing a typical design for a shallow zone (single-cased) well used at DBS&A. Figure 13.4.1-2 is a diagram showing a typical design for a deep zone (multi-cased) well used at DBS&A. Attachment 1 to this SOG is a material supply list (Form No. 118) for monitor well installation and should be completed and checked prior to the field stage of the drilling program by both DBS&A and the drilling subcontractor. Attachment 1 to this SOG should be used in conjunction with the "Drilling Information Checklist" and the "Drilling Equipment and Support Vehicles Checklist" (Form Nos. 116 and 117, Section 13.3.1 of the Operations Manual).

3.2.1 Water

Water used in the drilling process, to prepare grout mixtures and to decontaminate the well screen, riser, and annular sealant injection equipment, should be obtained from a source of known chemistry or should be characterized. The chemical analysis should confirm that the added water does not contain constituents that could compromise the integrity of the well installation or that may be potential contaminants.

3.2.2 Filter Pack

1. The grain-size distribution curve for the filter pack is selected by multiplying the 70% retained size of the finest formation sample by 3 or 4. Typically 10/20 silica sand is usually appropriate for the filter pack.
2. Do not select too fine a filter pack because this will reduce the yield of the well, causing longer sampling times.
3. Uniformity coefficients for filter pack materials should range from 1 to 3.
4. All filter pack material should be purchased from reputable suppliers who have properly cleaned and bagged the material.
5. To prevent downward migration of the bentonite or cement into the screen, the filter pack is extended at least 2 to 15 feet above the top of the screen.



6. The filter pack should not extend into an overlying water-bearing formation because this could permit downward vertical seepage in the pack and either dilute or add to the contamination of the water being monitored.

3.2.3 Well Screen

1. The well screen should be new, machine-slotted or continuous wrapped wire-wound, and composed of materials that are inert to the subsurface water being tested. Table 13.4.1-1 lists the advantages and disadvantages of several common screen materials.
2. The well screen material should be certified by the manufacturer as clean.
3. If not certified by the manufacturer as clean, the well screen should be steam cleaned or high-pressure water cleaned (if appropriate for the selected well screen materials) with water from a source of known chemistry immediately prior to installation.
4. The screen should be plugged at the bottom with the same material as the well screen.
5. The minimum nominal internal diameter of the well screen should be chosen based on the criteria that it will permit effective development and rapid sample recovery. In most instances, a minimal diameter of 2 inches (50 mm) is needed to allow for the introduction and withdrawal of sampling devices.
6. The slot size of the well screen should retain filter pack or natural formation along with permitting efficient development of the wells.

3.2.4 Riser

1. The riser should be new and composed of materials that are inert to the subsurface water being tested. Table 13.4.1-1 lists the advantages and disadvantages of riser materials.
2. The riser material should be certified by the manufacturer as clean.
3. If not certified by the manufacturer as clean, each section of the riser should be steam cleaned or high-pressure water cleaned (if appropriate for the selected material) using water from a source of known chemistry immediately prior to installation.
4. The minimal nominal internal diameter of the riser should be chosen based on the criteria that it will permit effective development and rapid sample recovery. In most instances, a minimum of 2 inches (50 mm) is needed to accommodate sampling devices.
5. Threaded joints are recommended. Alternatively, O-rings composed of materials that would not affect the subsurface water being sampled may be selected for use on flush joint threads.



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3.2.5 Casing

1. The casing material should be new and composed of materials that are inert to the subsurface water being tested. Table 13.4.1-1 lists the advantages and disadvantages of casing materials. The exterior casing (temporary or permanent multi-cased wells) is generally constructed of steel although other appropriate materials may be used.
2. Where conditions warrant, the use of permanent casing installed to prevent communication between water-bearing zones is encouraged.
3. The casing material should be certified by the manufacturer as clean.
4. If not certified by the manufacturer as clean, the casing material should be steam cleaned or high-pressure water cleaned (if appropriate for the selected material) using water from a source of known chemistry immediately prior to installation.
5. The material type and minimum wall thickness of the casing should be adequate to withstand forces of installation.
6. All casing that is to remain as a permanent part of the installation (that is, multi-cased wells) should be new and cleaned of interior and exterior protective coatings.
7. The minimal nominal internal diameter of the riser should be chosen based on the criteria that it will permit effective development and rapid sample recovery. In most instances, a minimum of 2 inches (50 mm) is needed to accommodate sampling devices.
8. The diameter of the casing for filter packed wells should be selected so that a minimum annular space of 2 inches (50 mm) is maintained between the inside diameter of the casing and the outside diameter of the riser. In addition, the diameter of the casings in multi-cased wells should be selected so that a minimum annular space of 2 inches is maintained between the casing and the borehole (that is, a 2-inch diameter screen will require first setting a 6-inch (152-mm) diameter casing in a 10-inch (254-mm) diameter boring).
9. The ends of each casing section should be either flush-threaded or bevelled for welding.

3.2.6 Annular Sealants

The materials used to seal the annulus may be prepared as a slurry or used unmixed in a dry pellet, granular, or chip form. Sealants should be selected to be compatible with ambient geologic, hydrogeologic, and climatic conditions and any man-induced conditions anticipated to occur during the life of the well. Table 13.4.1-2 lists the advantages and disadvantages of using bentonite or cement as grouting material for monitor wells. The following guidelines for the bentonite seal and grout backfill should be considered:



1. A bentonite seal of at least 2 feet is placed above the filter pack. Bentonite should be powdered, granular, pelletized, or chipped sodium montmorillonite furnished in sacks or buckets from a commercial source and free of impurities which adversely impact the water quality in the well. The diameter of pellets or chips selected for monitoring well construction should be less than one fifth the width of the annular space into which they are placed to reduce the potential for bridging.
2. The grout backfill that is placed above the bentonite seal is ordinarily a liquid slurry consisting of either a bentonite (powder or granules, or both) base and water or a Portland cement base and water. A mixture of bentonite and Portland cement can be used for the grout backfill. Refer to ASTM D 5092-90 for standards in mixing and placing the grout backfill.

3.2.7 Annular Seal Equipment

Prior to use, the equipment used to inject the annular seals and filter pack should be steam cleaned or high-pressure water cleaned (if appropriate for the selected material) using water from a known chemical source. This procedure is performed to prevent the introduction of materials that may ultimately alter the water sample quality.

3.3 Monitor Well Installation (ASTM D 5092-90)

A well completion diagram (DBS&A Form No. 048, Attachment 2) should be completed as an on-going process during the installation of the monitor well. General steps for monitor well installation are as follows:

1. A stable borehole must be constructed prior to installing the monitor well casing, screen and riser (refer to Section 13.3.1 of the Operations Manual for drilling guidelines).
2. The well casing, screen, riser, and bottom plug materials should either be certified by the manufacturer as clean or cleaned with a steam cleaner or high-pressure water combined with a low-sudsing soap or detergent.
3. Working components of the drilling rig (drill pipe, subs, collars, belly, and all parts of the rig chasis near the borehole) should be cleaned as described in step no. 2.
4. All plastic screens and casing should be joined by threads and couplings or flush threads to prevent contamination from solvent glues.
5. The well screen and riser assembly can be lowered to the predetermined level and held into position by a ballast or hydraulic arms on the drilling rig. The assembly must be installed straight with the appropriate centralizers to allow for the introduction and withdrawal of sampling devices.
6. The riser should extend above grade and be capped temporarily to deter entrance of foreign materials during completion operations.



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7. The volume of filter pack (gravel and/or silica sand) required to fill the annular space between the well screen and borehole should be estimated, measured during installation, and recorded on the well completion diagram during installation.
8. The filter pack is placed in the annulus from the bottom of the borehole up to 2 to 5 feet above the well screen.
9. If used, the temporary casing or hollow stem auger is withdrawn, usually in stipulated increments. Care should be taken to minimize lifting the riser with the withdrawal of the temporary casing/augers. To limit borehole collapse, the temporary casing or hollow stem auger is usually withdrawn until the lower most point on the temporary casing or hollow stem auger is at least 2 feet, but no more than 5 feet, above the filter pack for unconsolidated materials or at least 5 feet, but no more than 10 feet, for consolidated materials.
10. A bentonite pellet or a slurry seal is placed in the annulus between the borehole and the riser pipe on top of the filter pack. To be effective, the bentonite seal should extend above the filter pack a minimum of 2 feet, depending on local conditions.
11. Sufficient time should be allowed for the bentonite pellet seal to hydrate or the slurry annular seal to expand prior to grouting the remaining annulus. The volume and elevation of the bentonite seal material should be measured and recorded on the well completion diagram.
12. The volume and location of grout used to backfill the remaining annular space is recorded on the well completion diagram. An ample volume of grout should be premixed on site to compensate for unexpected losses.
13. Grout is introduced in one continuous operation until full strength grout flows out at the ground surface without evidence of drill cuttings or fluid.
14. The riser or casing or both should not be disturbed until the grout sets and cures for the amount of time necessary to prevent a break in the seal between the grout and riser, or grout and casing, or both.
15. Specific grouting procedures for single- and multi-cased wells are included in ASTM D 5092-90.
16. Well protection refers specifically to installations made at the ground surface to deter unauthorized entry to the monitor well and to prevent surface water from entering the annulus. Typically a concrete pad, protective shroud with a lock, and vented cap are placed on monitor wells constructed for DBS&A projects.
17. In areas where there is a high probability of damaging the well (high traffic, heavy equipment, poor visibility), it may be necessary to enhance the normal protection of the monitor well through the use of posts, markers, signs, etc.



18. Once the monitor well installation is complete, the well should be developed according to standards outlined in Section 13.4.3 of the Operations Manual.
19. The drilling subcontractor is required to file a well record with the State Engineer within 10 days after completion of the well.

4. ATTACHMENTS

- Table 13.4.1-1
 - Table 13.4.1.2
 - Figure 13.4.1-1
 - Figure 13.4.1.2
1. Monitor Well Installation Supply List (DBS&A Form No. 118, 6/93)
 2. Well Completion Record (DBS&A Form No. 048)

5. REFERENCES

- Aller, L., T.W. Bennett, G. Hackett, R.J. Petty, J.H. Lehr, H. Sedoris, D.M. Nielson, and J.E. Denne. 1989. Handbook of Suggested Practices for the Design and Installation of Ground-Water Monitoring Well Design and Installation. National Well Water Association. Dublin, OH. 398 p.
- Arizona Department of Water Resources. Undated. Well Construction and Licensing of Well Drillers, Handbook.
- ASTM. 1990. Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers. Standard D 5092-90. Philadelphia, PA.
- Driscoll, F.G. 1986. Groundwater and Wells. Johnson Division. St. Paul, MN. 1089 p.
- EPA. 1986. RCRA Ground-Water Monitoring Technical Enforcement Guidance Document. U.S. EPA. Washington, D.C. September. 208 p. and 3 Appendices.

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Table 13.4.1-1 Well Casing, Screen, and Riser Materials

Type	Advantages	Disadvantages
Stainless steel	<ul style="list-style-type: none">• Least absorption of halogenated and aromatic hydrocarbons• High strength at a great range of temperatures• Excellent resistance to corrosion and oxidation• Readily available in all diameters and slot sizes	<ul style="list-style-type: none">• Heavier than plastics• May corrode and leach some chromium in highly acidic waters• May act as a catalyst in some organic reactions• Screens are higher priced than plastic screens
PVC (Polyvinyl-chloride)	<ul style="list-style-type: none">• Lightweight• Excellent chemical resistance to weak alkalis, alcohols, aliphatic hydrocarbons, and oils• Good chemical resistance to strong mineral acids, concentrated oxidizing acids, and strong alkalis• Readily available• Low priced compared to a stainless steel and Teflon	<ul style="list-style-type: none">• Weaker, less rigid, and more temperature sensitive than metallic materials• May adsorb some constituents from ground water• May react with and leach some constituents from ground water• Poor chemical resistance to ketones, esters, and aromatic hydrocarbons
Teflon	<ul style="list-style-type: none">• Good resistance to attack by most chemicals• Lightweight• High impact strength	<ul style="list-style-type: none">• Screen slot openings may decrease in size over time• Tensile strength and wear resistance low compared to other engineering plastics• Expensive relative to other plastics and stainless steel
Mild steel	<ul style="list-style-type: none">• Strong, rigid; temperature sensitivity not a problem• Readily available• Low priced relative to stainless steel and Teflon	<ul style="list-style-type: none">• Heavier than plastics• May react with and leach some constituents into ground water• Not as chemically resistant as stainless steel

**Table 13.4.1-1 Well Casing, Screen, and Riser Materials (Continued)**

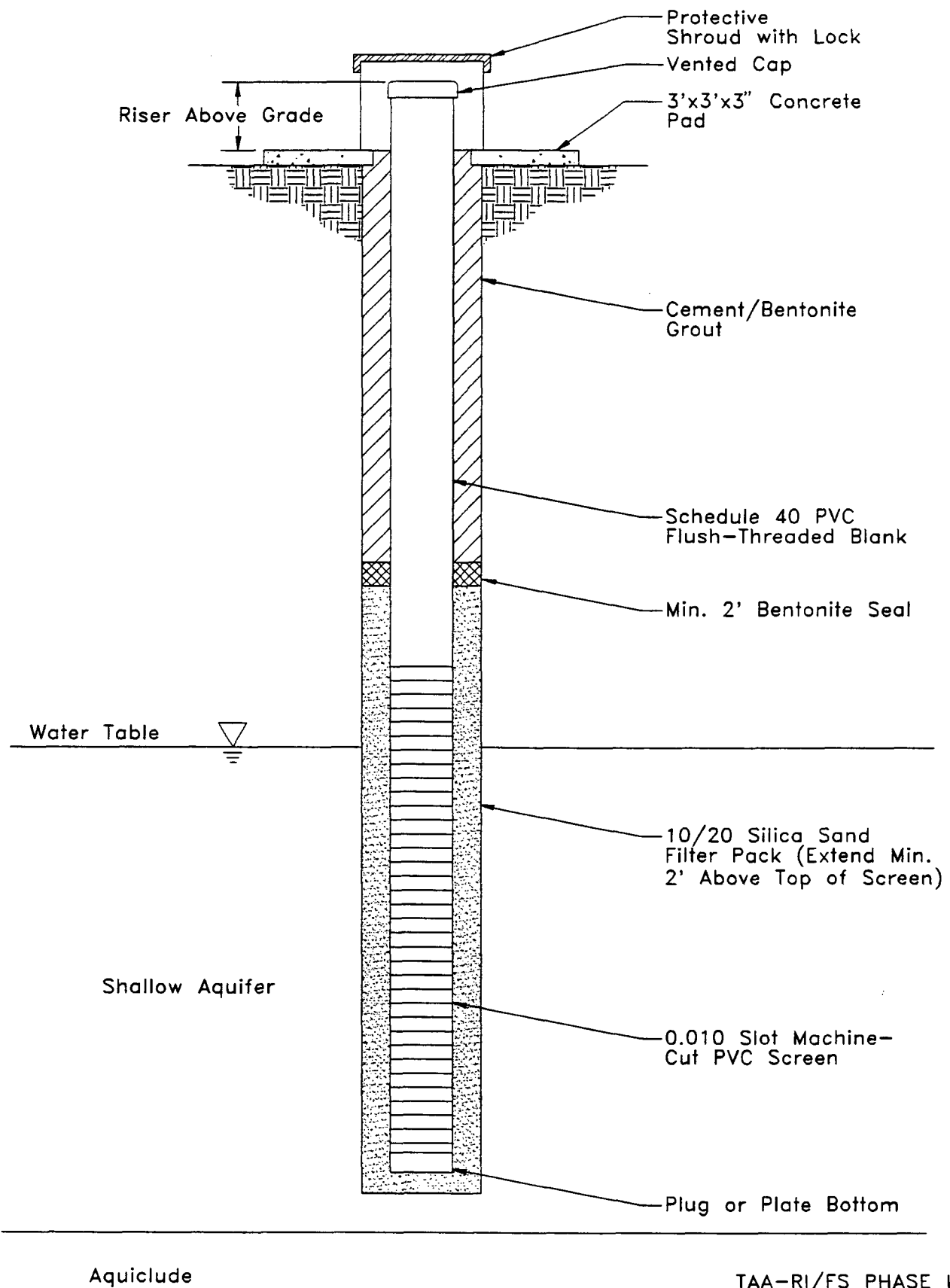
Type	Advantages	Disadvantages
Polypropylene	<ul style="list-style-type: none">• Lightweight• Excellent chemical resistance to mineral acids• Good to excellent chemical resistance to alkalies, alcohols, ketones, and esters• Fair chemical resistance to concentrated oxidizing acids, aliphatic hydrocarbons, and aromatic hydrocarbons• Low priced compared to stainless steel and Teflon	<ul style="list-style-type: none">• Weaker, less rigid, and more temperature sensitive than metallic materials• May react with and leach some constituents into ground water• Poor machinability--it cannot be slotted because it melts rather than cuts
Kynar	<ul style="list-style-type: none">• Greater strength and water resistance than Teflon• Resistant to most chemicals and solvents• Lower priced than Teflon	<ul style="list-style-type: none">• Not readily available• Poor chemical resistance to ketones, acetone

(After Driscoll, 1986)

**Table 13.4.1-2. Grouting Materials for Monitoring Wells**

Type	Advantages	Disadvantages
Bentonite	<ul style="list-style-type: none">• Readily available• Inexpensive	<ul style="list-style-type: none">• May produce chemical interference with water-quality analysis• May not provide a complete seal because:<ul style="list-style-type: none">--There is a limit (14 percent) to the amount of solids that can be pumped in a slurry. Thus, there are few solids in the seal; should wait for liquid to bleed off so solids will settle--During installation, bentonite pellets may hydrate before reaching proper depth, thereby sticking to formation or casing and causing bridging--Cannot determine how effectively material has been placed--Cannot assure complete bond to casing
Cement	<ul style="list-style-type: none">• Readily available• Inexpensive• Can use sand/or gravel filter• Possible to determine how well the cement has been placed by temperature logs or acoustic bond logs	<ul style="list-style-type: none">• May cause chemical interferences with water-quality analysis• Requires mixer, pump, and tremie line; generally more cleanup than with bentonite• Shrinks when it sets; complete bond to formation and casing not assured

(After Driscoll, 1986)



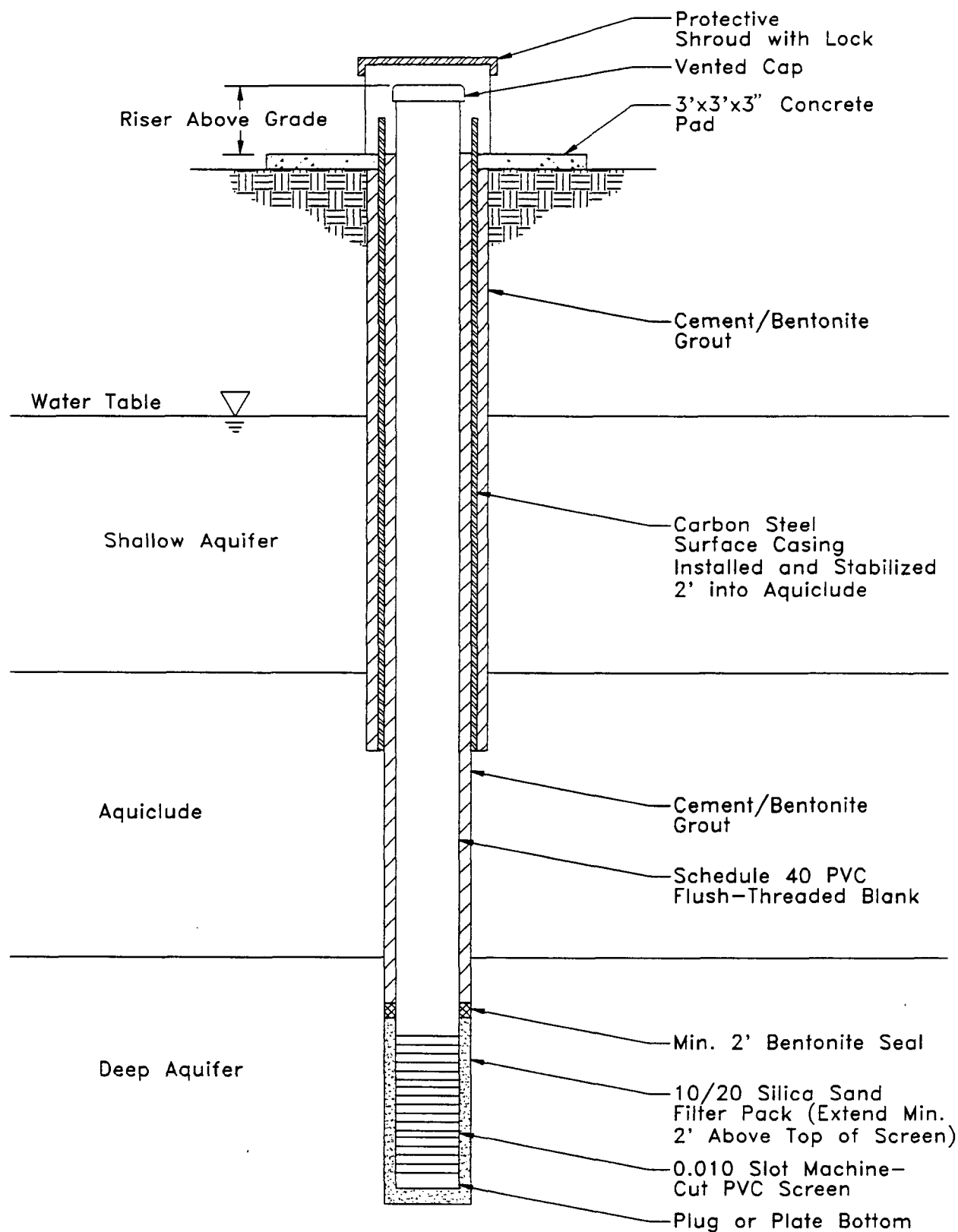
TAA-RI/FS PHASE II
Typical Shallow Zone Monitor Well Design
Single-Cased Well

Not to Scale



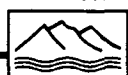
DANIEL B. STEPHENS & ASSOCIATES, INC.
 10-93 3230

Figure 13.4.1-1



TAA-RI/FS PHASE II
Typical Deep Zone Monitor Well Design
Multi-Cased Well

Not to Scale



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Figure 13.4.1-2



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Monitor Well Installation Supply List

Project No. _____ DBS&A Project Manager _____

DBS&A Technical Representative _____ DBS&A Field Representative(s) _____

Drilling Company _____

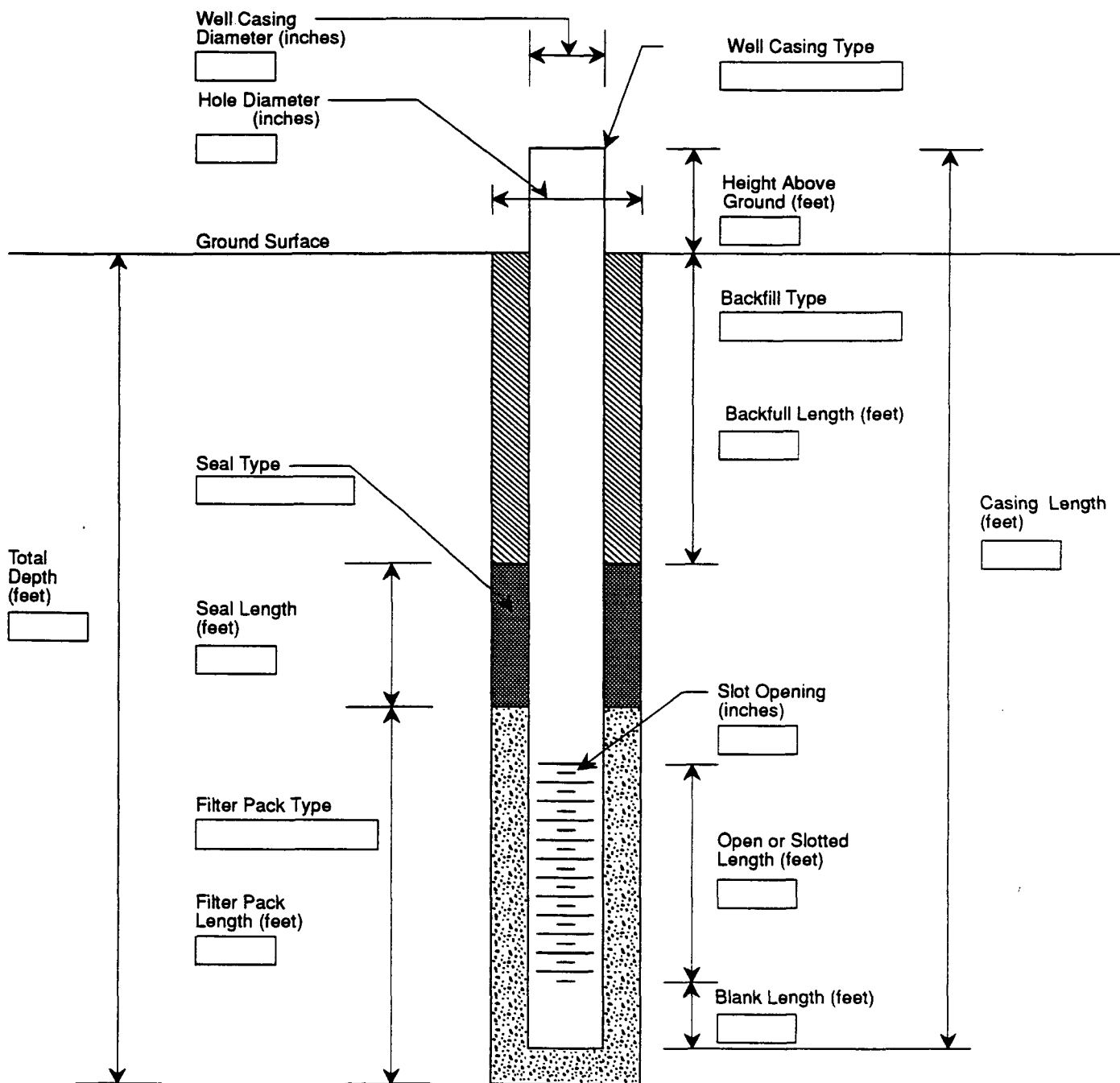
Drilling Company Contact _____ Phone No. _____

Date and Time for Work to Begin _____

Material	Size	Quantity	Equipment Supplier*
Sand			
Sand			
Pea Gravel			
Bentonite Powder			
Bentonite Pellets			
Bentonite Chips (Ca-montmorill. Slow, NA-montmorill. Fast Hydration)			
PVC (Flush-Threaded Schedule 40)			
PVC (Flush-Threaded Schedule 40)			
PVC (Flush-Threaded Schedule 40)			
PCV Screen Schedule 40 with Slot _____			
PCV Screen Schedule 40 with Slot _____			
PCV Screen Schedule 40 with Slot _____			
Stainless Steel Channel Pack			
Steel Conductor Casing			
Slip Caps			
Slip Caps			
Threaded Endcaps			
Threaded Endcaps			
Locking Caps			
Concrete			
Portland Cement			
Locking Well Vault			



Client _____ Project No. _____
Well No. _____ Site _____ Date Installed _____
Formation of Completion _____
DBS&A Personnel _____ Driller _____



Comments _____

Section 13.4.3

Well Development



1. PURPOSE

This section provides standard operating guidelines (SOGs) for well development.

2. SCOPE

This procedure is applicable to all DBS&A employees and subcontractors who are engaged in well development activities. Table 13.4.3-1 summarizes disadvantages and advantages for different well development methods. The scope of the procedures described in this section includes the following:

- Development Methods
- Duration of Well Development
- Well Recovery Test

Standards for well development are described in ASTM D 5092-90 ("Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers"). Refer to Driscoll (1986), EPA (September 1986) or Aller et al. (1989) for more detailed guidelines about well development.

3. GUIDELINES

Proper well development serves to 1) remove some finer grained material from the well screen and filter pack that may otherwise interfere with water quality analyses, 2) restore the ground-water properties disturbed during the drilling process, and 3) improve the hydraulic characteristics of the filter pack and hydraulic communication between the well and the hydrologic unit adjacent to the screened interval.

3.1 Development Methods (ASTM D 5092-90)

Methods of development most often used include mechanical surging and bailing or pumping, over-pumping, air-lift pumping, and well jetting. An important factor in any method is that the development work be started slowly and gently and be increased in vigor as the well is developed. Most methods of well development require the application of sufficient energy to disturb the filter pack, thereby freeing the fines and allowing them to be drawn into the well. The coarser fractions then settle around and stabilize the screen. The well development method chosen should be documented in the field notebook. Table 13.4.3-1 summarizes the opinions of several references on well development methods and can be helpful in selecting an approximate method for development wells screened in varying hydrologic units.

3.1.1 Mechanical Surging

In this method, water is forced to flow into and out of the well screen by operating a plunger (or surge block) or bailer up and down in the riser. A pump or bailer should then be used to remove the dislodged sediments following surging.



3.1.2 Over Pumping and Backwashing

The easiest, least expensive and most commonly employed technique of well development is some form of pumping. With over pumping, the well is pumped at a rate considerably higher than it would be during normal operation. The fine-grain materials would be dislodged from the filter pack and surrounding strata influenced by the higher pumping rate. This method is usually conducted in conjunction with mechanical surging.

In the case where there is no backflow prevention valve installed, the pump can be alternately started and stopped. This is called backwashing. This starting and stopping allows the column of water that is initially picked up by the pump to be alternately dropped and raised up in a surging action. Each time the water column falls back into the well, an outward surge of water flows into the formation. This surge tends to loosen the bridging of the fine particles into and out of the well.

3.1.3 Air Lift Pumping

In this method, an air lift pump is operated by cycling the air pressure on and off for short periods of time. This operation will provide a surging action that will dislodge fine-grained particles. Applying a steady, low pressure will remove the fines that have been drawn into the well by the surging action. Efforts should be made (that is, through the use of a foot valve) to avoid pumping air into the filter pack and adjacent hydrologic unit because the air may lodge there and inhibit future sampling efforts and may alter ambient water chemistry. Furthermore, application of high air pressures should be avoided to prevent damage to small diameter PVC risers, screens, and filter packs.

3.1.4 Well Jetting

Another method of development involves jetting the well screen area with water while simultaneously air-lift pumping the well. However, the water added during this development procedure will alter the natural, ambient water quality and may be difficult to remove. Therefore, the water added should be obtained from a source with known chemistry. Water from the monitor well being developed may also be used if the suspended sediments are first removed.

3.2 Duration of Well Development (ASTM D 5092-90)

Well development should begin no sooner than 48 hours after the monitor well is completely installed and prior to water sampling. Development should be continued until representative water, free of the drilling fluids, cuttings, or other materials introduced during well construction is obtained. Representative water is assumed to have been obtained when pH, temperature, and specific conductivity readings stabilize and the water is visually clear of suspended solids. The minimum duration of well development will vary according to the method used to develop the well. The duration of well development and the pH, temperature, and specific conductivity readings should be recorded in the field notebook.



3.3 Well Recovery Test (ASTM D 5092-90)

A well recovery test can be performed immediately after and in conjunction with well development. The well recovery test not only provides an indication of well performance but it may also provide data for determining the transmissivity of the screened hydrologic unit. Estimates of the hydraulic conductivity of the unit can then be determined. Readings should be taken at intervals suggested in Table 13.4.3-2 until the well has recovered to 90 percent of its static water level and recorded in the field notebook. Section 13.6 of the DBS&A Operations Manual describes methods for aquifer hydraulic testing specifically for establishing aquifer hydraulic parameters in greater detail.

Table 13.4.3-2 Suggested Recording Intervals for Well Recovery Tests

TIME SINCE STARTING TEST	TIME INTERVAL
0 to 15 min	1 min
15 to 50 min	5 min
50 to 100 min	10 min
100 to 300 min (5 hours)	30 min
300 to 1,440 min (24 hours)	60 min

4. ATTACHMENTS

- Table 13.4.3-1

5. REFERENCES

- Aller, L., T.W. Bennett, G. Hackett, R.J. Petty, J.H. Lehr, H. Sedoris, D.M. Nielson, and J.E. Denne. 1989. Handbook of Suggested Practices for the Design and Installation of Ground-Water Monitoring Well Design and Installation. National Well Water Association. Dublin, OH. 398 p.
- ASTM. 1990. Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers. Standard D 5092-90. Philadelphia, PA.
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- EPA. 1986. RCRA Ground-Water Monitoring Technical Enforcement Guidance Document. U.S. EPA. Washington, D.C. September. 208 p. and 3 Appendices.



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Table 13.4.3-1. Summary of Well Development Methods

Reference	Over-pumping	Backwashing	Mechanical Surging		Well Jetting	Air-lift Pumping
			Surge Block	Bailer		
Gass (1986)	Works best in clean coarse formations and some consolidated rock; problems of water disposal and bridging	Breaks up bridging, low cost & simple; preferentially develops	Can be effective; size made for $\geq 2"$ well; preferential development where screen $>5'$; surge inside screen		Consolidated and unconsolidated application; opens fractures, develops discrete zones; disadvantage is external water needed	Replaces air surging; filter air
United States Environmental Protection Agency (1986)	Effective development requires flow reversal or surges to avoid bridges	Indirectly indicates method applicable; formation water should be used	Applicable; formation water should be used; in low-yield formation, outside water source can be used if analyzed to evaluate impact	Applicable		Air should not be used
Barcelona et al.** (1983)	Productive wells; surging by alternating pumping and allowing to equilibrate; hard to create sufficient entrance velocities; often used with airlift		Productive wells; use care to avoid casing and screen damage	Productive wells; more common than surge blocks but not as effective		
Scalf et al. (1981)		Suitable; periodic removal of lines	Suitable; common with cable-tool; not easily used on other rigs	Suitable; use sufficiently heavy bailer; advantage of removing fines; may be custom made for small diameters		Suitable



Table 13.4.3-1. Summary of Well Development Methods (Continued)

Reference	Over-pumping	Backwashing	Mechanical Surging		Well Jetting	Air-lift Pumping
			Surge Block	Bailer		
National Council of the Paper Industry for Air and Stream Improvement (1981)	Applicable; drawback of flow in one direction; smaller wells hard to pump if water level below suction		Applicable; caution against collapse of intake or plugging screen with clay		Methods introducing foreign materials should be avoided (i.e., compressed air or water jets)	
Everett (1980)	Development operation must cause flow reversal to avoid bridging; can alternate pump off and on		Suitable; periodic bailing to remove fines		High velocity jets of water generally most effective; discrete zones of development	
Keely and Boateng (1987 a and b)	Probably most desirable when surged; second series of evacuation/recovery cycles is recommended after resting the well for 24 hours; settlement and loosening of fines occurs after the first development attempt; not as vigorous as backwashing	Vigorous surging action may not be desirable due to disturbance of gravel pack	Method quite effective in loosening fines but may be inadvisable in that filter pack and fluids may be displaced to degree that damages value as a filtering media		Popular but less desirable; method different from water wells; water displaced by short downward bursts of high pressure injection; important not to jet air or water across screen because fines driven into screen cause irreversible blockage; may substantially displace native fluids	Air can become entrained behind screen and reduce permeability

* Schalia and Landick (1986) report on special 2' valved block

** For low hydraulic conductivity wells, flush water up annulus prior to sealing; afterwards pump
(Compiled by Aller et al, 1989)

Section 13.4.4

Well and Boring Abandonment



1. PURPOSE

This section provides standard operating guidelines (SOGs) for well and boring abandonment.

2. SCOPE

This procedure is applicable to all DBS&A employees and subcontractors who are engaged in well and boring abandonment activities. The scope of the procedures described in this section includes the following:

- Need for Sealing Wells and Restoration of Geological Conditions
- Sealing Requirements
- Records of Abandonment Procedures

Abandonment activities conducted by DBS&A personnel will follow all applicable state regulations pertaining to well and boring abandonment.

3. GUIDELINES

Abandoned wells need to be sealed carefully to prevent pollution of the ground water source, eliminate any physical hazard, conserve aquifer yield, maintain confined head conditions, and prevent poor-quality water of one aquifer from entering another. The purpose of sealing an abandoned well is to prevent any further disturbance to the pre-existing hydrogeologic conditions that exist within the subsurface. The plug should prevent vertical movement within the borehole and confine the water to the original zone of occurrence. Driscoll (1986), EPA (September 1986) or Aller et al. (1989) provide more detailed procedures and guidelines for abandonment of wells. The following subsections outline general procedures and guidelines for abandonment of test holes, partially completed wells, and completed wells.

3.1 Need for Sealing Wells and Restoration of Geological Conditions

Abandoned test holes, including test wells, uncompleted wells, and completed wells shall be sealed for the following reasons:

1. Eliminate physical hazard.
2. Prevent contamination of ground water.
3. Conserve yield and hydrostatic head of aquifers.
4. Prevent intermingling of desirable and undesirable waters.

The guiding principle to be followed by the contractor in the sealing of abandoned wells is the restoration, as far as feasible, of the controlling geological conditions that existed before the well was drilled or constructed.



3.2 Sealing Requirements

Sealing requirements are as follows:

1. A well shall be measured for depth before it is sealed to ensure freedom from obstructions that may interfere with effective sealing operations.
2. Removal of liner pipe from some wells may be necessary to ensure placement of an effective seal.
3. If the liner pipe cannot be readily removed, it shall be perforated to ensure the proper sealing required.
4. Concrete, cement grout, or neat cement shall be used as primary sealing materials and shall be placed from the bottom upward by methods that will avoid segregation or dilution of material.

3.3 Records of Abandonment Procedures

Complete, accurate information shall be recorded in the field notebook of the entire abandonment procedure to provide detailed records for possible future reference and to demonstrate to the government state or local agency that the hole was properly sealed. Particularly, the following should be recorded accurately:

1. The depth of each layer of all sealing and backfilling materials shall be recorded.
2. The quantity of sealing materials used shall be recorded. Measurements of static water levels and depths shall be recorded.
3. Any changes in the well made during the plugging, such as perforating casing, shall be recorded in detail.

The owner or well permit holder should notify the appropriate state or local agency of the abandonment.

4. REFERENCES

Aller, L., T.W. Bennett, G. Hackett, R.J. Petty, J.H. Lehr, H. Sedoris, D.M. Nielson, and J.E. Denne. 1989. Handbook of Suggested Practices for the Design and Installation of Ground-Water Monitoring Well Design and Installation. National Well Water Association. Dublin, OH. 398 p.

ASTM. 1990. Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers. Standard D 5092-90. Philadelphia, PA.

Driscoll, F.G. 1986. Groundwater and Wells. Johnson Division. St. Paul, MN. 1089 p.



Guideline

Well and Boring Abandonment

SECTION 13.4.4

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Section 13.5

Water Sampling



1. PURPOSE

The purpose of this standard operating procedure (SOP) is to present guidelines and procedures for collection, preservation, and shipment of water samples for laboratory chemical analysis. This SOP also outlines procedures for measurement of field water quality parameters during sample collection activities.

2. SCOPE

The SOPs included in this section are applicable to all DBS&A employees, and its contractors and subcontractors, for the conduct of all activities listed in this section. **All SOPs described in this section are proprietary in nature and shall not be copied or reproduced, or distributed to any person or organization not employed by DBS&A, without the expressed written approval of the Systems Operations Manager (SOM) or President of DBS&A.** The scope of the procedure described in this section includes the following:

- 13.5.1 Preparation for Water Sampling
- 13.5.2 Decontamination of Field Equipment
- 13.5.3 Measurement of Field Parameters
- 13.5.4 Collection of Ground-Water Samples
- 13.5.5 Collection of Surface Water Samples
- 13.5.6 Sample Preservation
- 13.5.7 Sample Filtration
- 13.5.8 Quality Assurance/Quality Control (QA/QC) Samples

This SOP includes guidelines for preparation for water sampling, collection of surface- and ground-water samples, sample preservation, chain of custody procedures, and quality assurance/quality control procedures. This SOP is applicable to the collection of surface- and ground-water samples to be analyzed for organic, inorganic and radionuclide constituents and for measurement of field parameters including temperature, conductivity, pH, alkalinity, oxidation/reduction potential (Eh), and dissolved oxygen.

3. PROCEDURES

These SOPs shall be reviewed and updated at least once annually by the Systems Operations Manager (SOM), or person(s) designated by the SOM. Revisions and additions to these SOPs shall be made as needed to assure consistency with industry standards and the collection of high quality data in the field. Requests for revisions shall be made on Form No. 127 in accordance with the procedure described in Section 0.2 of the DBS&A Operations Manual. The Proprietary Copy Request and Authorization Form (DBS&A Form No. 043) shall be used in requesting, authorizing, and documenting any SOP, or part of any SOP, copied or distributed for uses described in Section 13.5 of the Operations Manual. All or parts of the SOPs described in this section may be reproduced and used in DBS&A reports, proposals, and work plans with the verbal consent of either the SOM or President of DBS&A. The SOM shall be responsible for filing and maintaining requests made on Form Nos. 127 and 043.



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Procedure
Water Sampling
SECTION 13.5

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Section 13.5.1

Preparation for Water Sampling



1. PURPOSE

The following SOP defines activities to be completed prior to each sampling event. A checklist/summary of water sampling preparation activities is included as Attachment 1 to this SOP.

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors when preparing to sample water.

3. PROCEDURES

3.1 DBS&A Warehouse

Prior to any water sampling event, the water sampler shall requisition all necessary equipment and supplies by completing a DBS&A Field Equipment and Materials Load-Up Sheet (see Section 13.1.1 of the DBS&A Operations Manual) and giving it to the warehouse manager. The load-up sheet should be provided to the warehouse manager as much in advance as is possible, so that equipment and supply requisitions can be made.

All equipment to be used, with the exception of rental equipment, shall be calibrated and tested in the DBS&A warehouse by the warehouse manager prior to being sent to the field per the guidance prescribed in Section 13.1.1 of the DBS&A Operations Manual. Meter calibration shall be conducted in accordance with standard manufacturer recommended procedures using clean, fresh reagents. The warehouse manager shall ensure that all equipment is clean and in working order prior to leaving the DBS&A warehouse.

3.2 Analytical Laboratory

Prior to a water sampling event, the number and type of samples to be collected (field and quality assurance samples) shall be determined by the Project Manager (PM) or designated project Technical Representative (TR). The PM or project TR shall order appropriate sample containers (Section 13.1.1) from the analytical laboratory and shall inform the analytical laboratory of the expected arrival date of the samples, the analytes to be determined for each sample, and the required turnaround time. It is the water sampler's (Field Representative; FR) responsibility to confirm that all sample bottles have been received and are loaded for sampling. The duties and responsibilities of TRs and FRs are described in Section 13.2 of the DBS&A Operations Manual.

3.3 Site-Specific Instructions

The first time that a site is sampled, or the first time that any new location is sampled, the designated sample identification number shall be determined by the PM or TR prior to field sampling.

Prior to each water sampling event, the PM or TR shall compile a list of samples (including quality assurance samples) to be collected. The order in which the samples should be collected shall also be listed. In general, locations with the lowest concentrations of select analytes shall be sampled before wells with higher



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concentrations, so the potential for cross-contamination can be minimized. The PM or TR will also list any special procedures that are unique to the site or to the sampling event.

Before each sampling round, the PM or TR shall make all access arrangements with the client and/or property owners. The FR(s) will confirm that access arrangements have been made and should determine if additional on-site access procedures are required.

Prior to leaving for the field, FR(s) shall assemble and be familiar with materials that describe the general conditions of the site, the hydrogeology, well completion information, and objectives of the sampling program. The project health and safety plan shall also be consulted before initiation of the field program.

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Section 13.5.2

Decontamination of Field Equipment



1. PURPOSE

The following SOP defines activities required to decontaminate water sampling equipment in order to prevent cross-contamination of samples from different sampling locations.

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors involved in water sampling activities.

3. PROCEDURES

All non-disposable field equipment that may potentially come in contact with any water sample shall be decontaminated in order to minimize the potential for cross-contamination between sampling locations. Thorough decontamination of all sampling equipment shall be conducted in the warehouse before each sampling event. In addition, the FR shall decontaminate all equipment in the field as required to prevent cross-contamination of water samples (see Section 13.1.1 of the DBS&A Operations Manual). The procedures described in this section are specifically for field decontamination of sampling equipment.

For wells or surface waters to be sampled for inorganics and/or metals, or for locations outside of the area of known contamination, the following procedures shall be used:

1. Wash the equipment in a solution of non-phosphate detergent (Liquinox) and distilled/deionized water. All surfaces that may come in direct contact with the samples shall be washed. Use a clean Nalgene tub to contain the wash solution and a scrub brush to mechanically remove loose particles. Wear clean latex or plastic gloves during all washing and rinsing operations.
2. Rinse twice with distilled/deionized water.
3. Dry the equipment before use, to the extent practical.

If the sample is collected from a highly contaminated area or is to be analyzed for organics, follow steps 1 and 2, then rinse once more with organic-free water obtained from the laboratory or other supplier. Contain all wash solutions for proper disposal.

4. REFERENCES

- American Petroleum Institute. 1987. Manual of Sampling and Analytical Methods for Petroleum Hydrocarbons in Groundwater and Soil. API Publication No. 4449. American Petroleum Institute, Washington. DBS&A #3600/API.



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Procedure
Decontamination of Field Equipment
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Section 13.5.3

Measurement of Field Parameters



1. PURPOSE

This section outlines procedures for field measurement of electrical conductivity, temperature, pH, alkalinity, oxidation/reduction potential (Eh), and dissolved oxygen (DO).

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors involved in water sampling activities. These parameters should be measured during monitor well purging prior to sampling. Surface water samples should also be characterized when they are collected.

3. PROCEDURES

3.1 Conductivity and Temperature

This SOP describes the procedure for determining the specific conductance (conductivity) and temperature of a water sample using the YSI Model 33 SCT Meter. Conductance, or conductivity, is a measure of the ease of flow of electric current, and is the inverse (reciprocal) of resistivity. The term specific conductance (SpC), sometimes referred to simply as "conductivity," is defined as the electrical conductance that would occur through the water between the faces of a 1-cm cube of the water. SpC is usually reported in units of $\mu\text{hos/cm}$, which has recently been renamed microsiemens per centimeter ($\mu\text{S/cm}$). By measuring the specific conductance of a water sample in the field, one can estimate the total dissolved solids (TDS) concentration of the water using the approximate conversion $\text{TDS} = 0.6 \times \text{SpC}$. Because the SpC of a water allows rapid determination of TDS (salinity), SpC is probably the single most useful water quality parameter.

The conductance of water containing dissolved ions increases with increasing temperature of the water. The temperature dependence varies for different waters and is dependent on the type and concentrations of dissolved ions, but an approximate rule of thumb is that SpC increases 2% per $^{\circ}\text{C}$ temperature increase. For quantitative comparison of SpC values measured on different water samples at different field temperatures, it is necessary to correct all values to the SpC at 25°C . For most qualitative work, however, this is unnecessary. Whether or not temperature corrections are to be applied, the SpC value as measured at field temperature should always be recorded in the field logbook (see Section 13.2.6 of the DBS&A Operations Manual), along with the temperature of the water sample at the time the measurement was made.

The following equipment is needed to measure SpC in the field:

- YSI Model 33 SCT Meter & probe
- Spare D-cell batteries
- Beaker for water sample
- Deionized water in squirt bottle
- KCl conductivity standard solution



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The following procedure shall be used to measure SpC in the field:

1. Verify that the meter needle rests on zero prior to turning on the meter. If not, adjust it to zero using the set screw on the face of the meter movement.
2. Calibrate the meter by turning the *MODE* switch to *REDLINE* and adjusting the *REDLINE* control knob until the needle lines up with the small red line on the meter scale. (If unable to calibrate meter, replace the batteries.)
3. Plug in probe cable, and insert gray plastic probe into water sample. Allow at least one minute for temperature equilibration of probe.
4. Set *MODE* control to *TEMPERATURE* and record the temperature of the water sample in the field logbook. (Note that the temperature scale is at the bottom of the meter face and that the values decrease to the right)
5. Switch the *MODE* control to the conductivity setting that gives the maximum needle deflection without going offscale (X100, X10, or X1). Do not allow the probe to touch the sides or bottom of the beaker when making a measurement because this can result in a low reading.
6. Record the SpC value, remembering to multiply the meter reading by the appropriate factor if using the X10 or X100 settings.
7. Rinse the probe with deionized water prior to making another measurement or putting the instrument away.

Other information about the YSI Model 33 SCT Meter may be needed occasionally:

- The probe preferably should be stored in deionized water between uses during each day of field work. If the probe has been stored dry, it is recommended that it be soaked in deionized water at the start of the day prior to making any measurements. This is not absolutely essential, however.
- The *SALINITY* mode will not ordinarily be used unless dealing with brines or other samples with salinity of seawater or above. The *TEMPERATURE* potentiometer only functions in *SALINITY* mode; it does nothing when operating in SpC mode and cannot be used to correct SpC values to 25°C.
- To test probe operation, press the *CELL TEST* button while measuring the SpC of a water sample on the X10 or X100 scales. If the probe is functioning properly, the meter reading should not fall more than 2% when depressed. If the meter reading falls more than 2%, notify the equipment technician that the probe needs attention.
- The meter and probe should be periodically checked against a standard potassium chloride (KCl) solution to verify proper internal calibration. To do so, immerse the (clean) probe in the KCl standard, and record the temperature and SpC values as described above. Check that the SpC value is within



± 5% of the nominal SpC value for that particular KCl solution at that temperature. Record the observed value and the nominal value (from label on bottle) in the field logbook.

3.2 pH

This section describes the procedure for determining the pH of a water sample using the Orion Model 250A pH/mV meter with automatic temperature compensation. Calibration of the meter is performed at least daily using two buffer solutions that bracket the sample pH. A temperature sensor is included on the pH probe to make the minor correction from the sample temperature to 25°C. For information on manual temperature correction, refer to meter instruction manual. The Orion 250A can also be used in millivolt mode with a variety of ion selective electrodes (refer to ISE SOPs).

The following equipment is needed to measure pH in the field:

- Orion Model 250A pH meter
- Buffer solutions (pH 4.01, 7.00, 10.00)
- Spare 9-volt battery
- Beaker for water sample
- Deionized water in squirt bottle

The following procedure shall be used to measure pH in the field:

1. Plug the pH probe and thermistor (ATC) into the appropriate jacks of the meter.
2. Insert battery (if necessary), and press the power button to turn on the meter.
3. If the meter is not already in pH mode as indicated by the caret at the bottom of the display, press the mode button to select pH mode.
4. Rinse the probe with deionized water to remove any dried KCl salts, and slide the silicone rubber sleeve down to expose the electrolyte fill hole. Leave the hole uncovered during measurement, but do not allow the hole to be submerged in the sample.
5. Remove the plastic end cap on the probe, rinse the tip of the probe in deionized water, and insert the probe in the pH 7.0 buffer.
6. Press "2nd," then "Cal" to put the meter in calibration mode. The word "calibrate" should appear on the display, and the designation "P1" indicates that the meter is ready for the first buffer calibration.
7. Stir the probe gently in the pH 7.0 buffer solution. When the reading has stabilized, the meter will beep and the word "ready" will appear. Press "yes" to accept the reading and set the pH 7.0 calibration. "P2" will be displayed, indicating that the meter is ready for the second buffer solution.



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8. Rinse the probe with deionized water, and insert it in the pH 4.0 buffer. (If the pH of the water sample is anticipated to be >7, then substitute the pH 10.0 buffer.)
9. When the meter indicates "ready," press "measure" to accept the pH 4.0 calibration. The slope of the calibration curve will be displayed briefly. Record the slope in the field logbook. The slope value should be within the range of 90 to 110. If not, repeat the calibration procedure. The meter will automatically exit the calibration mode, and the word "measure" will be displayed.
10. Rinse the probe and insert it into the water sample to be measured. Stir gently while waiting for the word "ready" to appear. Record the pH value in the field logbook.
11. If more measurements are to be made, rinse the probe and store temporarily in a beaker of deionized water. If finished for the day, turn the meter off, rinse the probe, disconnect the plugs, and store the probe with a few milliliters of the KCl electrode storage solution inside the black plastic end cap.

3.3 Alkalinity

This section describes the procedures for determining the total alkalinity in near-neutral pH, high-alkalinity water samples (most ground waters) using the Hach Test Kit. For information on the procedure for low-alkalinity samples or high pH samples (pH>8), refer to the Hach instruction sheet.

The following equipment is needed to determine total alkalinity in the field:

- Hach Alkalinity Test Kit

The following procedure shall be used to determine total alkalinity in the field:

1. Fill the small plastic test tube with the water to be tested.
2. Pour the contents of the test tube into the square glass bottle.
3. Add the contents of one foil packet containing the *Bromcresol Green/Methyl Red* color indicator. The water will turn a dark green.
4. Carefully begin adding the standard sulfuric acid titrant dropwise using the eye dropper, counting the number of drops added and swirling to mix the solution. Keep the eye dropper nearly vertical to maintain a constant drop volume.
5. When the solution begins to change from green to red, slow down. The titration is complete when the solution is a bright pink color.
6. Record the total number of drops added. Multiply the number of drops by 20 to obtain the total alkalinity, reported as mg/L of CaCO_3 .



3.4 Oxidation-Reduction Potential (Eh)

This section describes the procedure for determining oxidation reduction potential of water in the field using an electrode.

The following equipment is needed to measure Eh in the field:

- Yellow Oxidation-Reduction Potential (ORP) Electrode
- Orion Model 250A pH/mV meter or YSI Model 3500 flow-thru cell meter
- Standard Zobell solution

The following procedure should be used to measure Eh in the field:

1. Plug the BNC connector into an Orion 250A pH/mV meter (or YSI 3500 meter).
2. Turn on the meter. If using the Orion 250A, use *MODE* key to set meter to "mV" mode (not *rel mV*). If using the YSI 3500, turn the black knob to "mV".
3. Check probe operation by immersing it in a disposable beaker with Zobell Solution. The reading should be ± 10 mV of that listed on the table with the Zobell Solution at the temperature of the solution (e.g., 231 mV at 25° C).
4. Rinse the probe and immerse it in the ground-water sample. Following stabilization, record the mV value, along with a \pm estimate to indicate the stability of the meter. Also record the sample temperature.

3.5 Dissolved Oxygen (DO)

This section describes the procedure for determining the dissolved oxygen (DO) concentration using the YSI Model 57 DO meter. The meter is calibrated using the air calibration procedure, with corrections for ambient temperature and altitude/barometric pressure. Refer to the instruction manual for details of meter operation and replacement of the probe membrane.

The following equipment is needed to measure dissolved oxygen in the field:

- YSI Model 57 Dissolved Oxygen Meter
- Beaker for water sample
- Deionized water in squirt bottle
- Means of determining the approximate altitude of the site (topo map, altimeter, etc.)

The following procedure shall be used to measure dissolved oxygen in the field:

1. Turn the meter on approximately 15 minutes before measuring samples to allow the probe to polarize. The probe shall be kept in the clear plastic cover. Add a few drops of deionized water



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to the small sponge inside the cover to maintain 100% relative humidity around the tip of the probe during storage.

2. Set the salinity knob to "fresh" for normal ground waters, or adjust to the appropriate salinity if brackish or saline waters are to be measured (as determined by specific conductance or previous laboratory analysis).
3. Set the zero on the meter by turning the switch to *ZERO* and adjusting the zero potentiometer until the needle falls on zero.
4. Set the red line on the meter by turning the switch to *RED LINE* and adjusting the appropriate potentiometer.
5. With the probe still in its cover, set the switch to *TEMPERATURE* and note the ambient air temperature displayed on the meter.
6. Determine the maximum (sea level) dissolved oxygen concentration (mg/L) possible for that temperature by referring to the table on the back of the DO meter (also in the instruction manual). Note this value in the field logbook.
7. Determine the approximate altitude of the site, and find the appropriate altitude correction factor on the table on the back of the meter (also in the instruction manual).
8. Multiply the saturated DO concentration determined in Step 5 by the altitude correction factor determined in Step 6. Note the value in the field logbook. This is the corrected saturated DO concentration (corrected for both temperature and altitude). Calibration should be periodically checked during the day as the temperature changes, and adjusted if necessary.
9. Switch the meter to the appropriate measurement scale for the corrected DO concentration determined in Step 7 (e.g., 0-10 mg/L scale), and use the *CALIBRATE* knob to air calibrate the meter by adjusting until the needle falls on the value determined in step 8. The meter is now ready to measure water samples.
10. Rinse the probe with deionized water, and insert it in the water sample and stir gently. Set the switch to *TEMPERATURE*, and record the reading in the field logbook.
11. Set the switch to the appropriate DO scale (e.g., 0-5 mg/L) to keep the needle on scale, and stir gently until a stable reading is obtained. It is important to be stirring the sample when the actual reading is taken. Record the value in the field logbook.
12. The probe may be stored temporarily in deionized water between measurements. When finished for the day, rinse the probe, and store with the dampened sponge in the plastic cap.



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Section 13.5.4

Collection of Ground-Water Samples



1. PURPOSE

The following SOP defines activities to be completed for the collection of ground-water samples.

2. SCOPE

This procedure is applicable to all DBS&A employees, its contractors and subcontractors, when collecting ground-water samples.

3. PROCEDURES

3.1 Wellhead Preparation

Prior to ground-water sample collection, the following wellhead protection activities shall be conducted:

1. Inspect the area around the well for wellhead integrity, cleanliness, and signs of possible contamination.
2. Spread a clean plastic sheet over the ground around the wellhead, where required.
3. Remove the cap on the wellhead. Note any obvious odors within the wellbore in the field logbook.
4. If possible, measure the static water level (see Section 13.6.1 of the DBS&A Operations Manual) prior to initiation of water sampling. Clean the steel tape or electrical sounder used for water level measurement after each use, as described in Section 13.5.2 of the Operations Manual, to avoid cross contamination.
5. If floating product (e.g., gasoline) is suspected at the site, conduct the following procedures:
 - Use a bailer to extract a sample from the surface of the water within the well, if possible.
 - After an initial visual inspection, slowly pour the fluid from the bailer into a small tub or container in order to check for a sheen or any other sign of free product. Note any obvious odors in the field logbook.
 - If free product is detected, use the bailer to remove as much free product as is possible from the wellbore. Lower the bailer into the water slowly in order to prevent mixing and volatilization. Contain all recovered product for proper disposal and note the quantity of product removed in the field logbook.
 - If the site has not been previously sampled, a sample of the free product may be desired. Consequently, place some of the product in an unpreserved 40-mL glass VOA vial, and store it away from the other samples. Confirm sample analysis with the project manager.



- After any free product has been removed from the wellbore, spread a fresh plastic sheet around the wellhead, and clean all contaminated equipment, or segregate it from the other equipment.

3.2 Well Purging

The purpose of purging the well prior to sampling is to remove stagnant water from the well bore so that a representative ground-water sample can be collected. The method of purging can have a pronounced effect on the quality of the ground-water sample. For example, rapid purging may increase sample turbidity and is, therefore, not recommended.

In general, positive displacement (bladder) pumps are preferred for most sampling situations. However, depending on the hydraulic conductivity of the aquifer to be sampled and the project objectives, wells may either be equipped with dedicated pumps or may need to be purged with bailers. Consequently, purging techniques may vary depending on the aquifer conditions, the presence or absence of a dedicated pump, and the proposed sample analytes.

The optimum amount of water to be purged from each well also varies between sites. According to Barcelona et al., 1985, pg. 47, "The number of well volumes to be pumped from a monitoring well prior to the collection of a water sample must be tailored to the hydraulic properties of the geologic materials being monitored, the well construction parameters, the desired pumping rate, and the sampling methodology to be employed."

Site-specific purging procedures shall be prepared for each site. The following purging procedure can be used as a general guideline:

1. Calculate the volume of water standing in the casing by using the formula:

$$V = \pi r^2 L$$

where

r = the radius of the casing (remember to convert inches to feet)

L = the length of the water column (total depth of well minus the static water level)

2. Purge the well at a rate equal to or greater than the sampling rate.
3. Measure applicable field parameters (see Section 13.5.3 of the Operations Manual) at the pump outlet at a minimum after each 0.5 casing volume is pumped. Purging is generally considered complete when the above parameters are approximately stable over at least one casing volume. Wherever possible, purge a minimum of three (3) casing volumes from each well.
4. In low permeability formations, it may not be possible to purge three casing volumes before the well goes dry. When the formation permeability is too low to allow for continuous purging, remove all of the standing water in the well by pumping or bailing. As soon as the well has recharged sufficiently, collect a sample so as to minimize volatilization in the wellbore.



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5. Contain all fluid from obviously contaminated or potentially contaminated wells for later disposal. Anomalous values for the above field parameters, odor, visible sheen, or the presence of free product may be taken as signs of contamination. Results of previous water sampling events will be consulted when available.
6. Take careful notes in order to document all purging procedures. The notes shall include: date, time, name(s) of sampler(s), weather, purge rate, purge method, field parameters (at each time measured, with corresponding purge volume), visual observations, odor, and any other relevant information.

The following guidelines as outlined in pertinent references on water sampling can be used when developing site-specific purging procedures:

- Pg. 103 of the EPA RCRA Technical Enforcement Guidance Document (TEGD) states, "in low yield formations, water should be purged so that it is removed from the bottom of the well." (NWWA, 1986).
- Pg. 103 of the TEGD also states "Whenever a well is purged to dryness, a sample for field parameters should be collected as soon as the well has recovered sufficiently. A second measurement of field parameters should be made immediately after sampling. Do not pump a well to dryness if it causes formation water to cascade down the well." (Ibid).
- The inlet line of the sampling pump or the submersible pump should be placed near the bottom of the screen section, and pump approximately one well volume of water at the well's recovery rate, and then collect the sample from the discharge line (EPA 1977, pg. 211).
- According to Wehrmann (1984), "For high yielding monitoring wells which cannot be pumped to dryness, bailing without pre-pumping the well is not recommended; there is no absolute safeguard against contaminating the sample with stagnant water." The following procedures should be used:

Place the inlet line of the sampling pump just below the surface of the well water, and pump three to five volumes of water at a rate equal to the well's recovery rate. This provides reasonable assurance that all stagnant water has been evacuated and that the sample will be representative of the groundwater body at that time.

- Wehrmann (1984) further states, "The rate at which wells are purged should be kept to a minimum. Purging rates should be lower than development rates so that well damage does not occur. Pumping at very low rates in effect, isolates the column of stagnant water in the well bore and negates the need for its removal, if the pump intake is placed at the top of, or in, the well screen. This approach can be very useful when disposal of purge water is a problem."
- If a well completed in a highly permeable formation is being purged, it may be useful to periodically move the intake of the purge pump during purging so that stagnant water does not remain in the well bore while fresh water comes in at only one level (Scalf et al., 1981, pg. 44).



3.3 Ground Water Sample Collection

The following procedure shall be used to collect ground-water samples:

1. If the well is not equipped with a sampling pump, use only teflon or stainless steel bailers for sampling. In order to minimize agitation and volatilization, bailers shall be equipped with bottom emptying devices when VOA samples are collected.
2. Whenever possible, collect ground-water samples first from wells that have the lowest potential concentrations of analytes of interest, and last from the wells with the highest suspected concentrations (i.e., clean → dirty). The specific sampling order will be detailed in the site-specific sampling plan.
3. Pumps equipped with Teflon tubing or disposable teflon bailers are generally recommended for collection of samples to be analyzed for volatile organics.
4. Select the appropriate sample container and preservative as described in Section 13.5.6.
5. After the well has been purged, collect water samples as soon as possible in order to reduce the possibility of volatilization within the wellbore. If a pump has been used for purging, lower the pump rate so that the sampling rate is lower than the purge rate. If volatile organic samples are to be collected, set the pump at the lowest possible setting. If possible, the sampling rate should be less than 100 ml per minute, or the minimum setting on the pump.
6. Collect samples in decreasing order of volatility, i.e. collect samples to be analyzed for volatile organic compounds (VOCs) first, followed by semi-volatile organic compounds, PCBs and pesticides, and inorganics. The preferred order of sampling according to the TEGD is VOCs, SVOCs, purgeable organic halogens (POX), total organic halogens (TOX), total organic carbon (TOC), extractable organics, total metals, dissolved metals, phenols, cyanide, sulfate and chloride, turbidity, nitrate and ammonia, and radionuclides.
7. Do not allow the outlet of the sampling pump discharge tubing to come into direct contact with the sample vial or the water within the vial.
8. Make sure that no air is entrapped in the sample vials to be analyzed for volatile organics. Take the sample by holding the vial at an angle so that aeration is minimized. Avoid touching the lip of the vial or the Teflon liner. If the sample cannot be transferred directly to the vial, (i.e. high production well) use a clean stainless steel cup to pour the water into the vial. Direct the water stream against the inside surface of the vial. Allow a convex meniscus to form across the mouth of the filled vial. Carefully cap the vial, then invert and tap the vial to insure that no entrapped air is present. If entrapped air is present, recollect the sample.
9. If filtering of any samples is required by the site specific sampling plan, use the filtering procedure described in Section 13.5.7.



10. Preserve the sample as indicated in Section 13.5.6. Whenever possible, use pre-preserved containers supplied by the analytical laboratory rather than adding preservatives in the field.
11. Measure field parameters as described in Section 13.5.3. Temperature, electrical conductivity, and pH generally will be measured at all locations. Alkalinity, dissolved oxygen, and Eh will be measured only as required by the site specific sampling plan.
12. If the sample is to be collected from a domestic well or location other than a monitoring well, it may be necessary to clean the sampling port prior to sample collection (e.g., an outside hose bib or an inside water facet). Flush the faucet/line by allowing it to run for a minimum of five minutes.
13. Collect samples from domestic wells downstream of water softeners or chlorinators or in-home filters that modify water quality. However, if the objective of the domestic sampling is to evaluate the ground water prior to treatment, the samples may be taken upstream of such devices.
14. Record all pertinent information in the field notebook. Data to be recorded include the date and time of sample collection, climatic conditions at the time of sampling, well sampling sequence, types of sample containers used, sample identification numbers, field parameter data, name(s) of collector(s), deviations from established sampling protocol (e.g., equipment malfunctions), purpose of sampling (e.g., surveillance, compliance), and collection of quality control samples.

4. REFERENCES

- Barcelona, Michael J., James P. Gibb, John A. Helfrich and Edward E. Garske. 1985. Practical Guide for Ground-Water Sampling. Prepared in cooperation with RSKERL, Ada, Oklahoma. SWS Contract Report 374. DBS&A #560/BAR/1985.
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Procedure
Collection of Ground-Water Samples
SECTION 13.5.4

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Section 13.5.5

Collection of Surface Water Samples



1. PURPOSE

The following SOP defines activities to be completed for the collection of surface water samples.

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors when collecting surface water samples.

3. PROCEDURES

A site-specific water sampling plan shall be prepared to define surface water sampling locations and procedures that are unique to each site. The following general procedure shall be followed for collection of surface water samples:

1. Select the water sampling location. Collect spring samples as close to the source as possible. Do not collect spring or stream samples from stagnant pools; collect these samples from free running locations if possible. The selection of the optimum sampling locations should be based on the objectives of the site-specific sampling plan.
2. Whenever possible, make a discharge measurement at the time of water sampling. If it is not possible to gauge the surface water discharge (see Section 13.9 of the DBS&A Operations Manual), make an estimate, and describe the procedure used to estimate the discharge in the field logbook.
3. Collect surface water samples as "grab" samples unless a depth integrated sampler or other procedure is required in the site specific sampling plan.
4. If the surface water is frozen, ice samples should not be taken in lieu of water samples.
5. Select the appropriate container as described in Section 13.5.6 of the Operations Manual.
6. For non-volatile analytes, dip a clean unpreserved container directly into the surface water, and partially fill the container. Swirl and rinse the container, and then discard the water.
7. Rinse the container two more times.
8. Fill the container with surface water.
9. Collect samples in decreasing order of volatility, i.e. collect samples to be analyzed for volatile organic compounds (VOCs) first, followed by semi-volatile organic compounds (SVOC), PCBs and pesticides, and inorganics. The preferred order of sampling according to the TEGD is VOCs, SVOCs, purgeable organic halogens (POX), total organic halogens (TOX), total organic carbon (TOC), extractable organics, total metals, dissolved metals, phenols, cyanide, sulfate and chloride, turbidity, nitrate and ammonia, and radionuclides.



Procedure
Collection of Surface Water Samples

SECTION 13.5.5

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10. Make sure that no air is entrapped in the sample vials to be analyzed for volatile organics. Take the sample by holding the vial at an angle so that aeration is minimized. Avoid touching the lip of the vial or the Teflon liner. If the sample cannot be collected directly from the water source, use a clean stainless steel cup. Direct the water stream against the inside surface of the vial. Allow a convex meniscus to form across the mouth of the filled vial. Carefully cap the vial, then invert and tap the vial to insure that no entrapped air is present. If entrapped air is present, recollect the sample.
11. If filtering of any samples is required by the site specific sampling plan, use the filtering procedure described in Section 13.5.7 of the Operations Manual.
12. Either add preservatives directly to the container as described in Section 13.5.6 of the Operations Manual, or transfer the sample to a pre-preserved container. If transferring the sample between containers, pour the water slowly from the glass bottle or cubitainer to the sample container.
13. Fill a clean beaker or other appropriate container with surface water for field parameter measurement as discussed in Section 13.5.3 of the Operations Manual. Temperature, electrical conductivity, and pH generally will be measured at all locations. Alkalinity, dissolved oxygen, and Eh will be measured only as required by the site-specific sampling plan.
14. Carefully document the surface water sampling location. Photographs of the sampling location should be taken from several locations if possible. Describe each photograph along with the photo number in the log book (e.g., photo #5-Upstream (south) view of location # SPG-014, taken from the west bank). Also include the time, date, and the name of the photographer in the log book, and transfer this information to the back of photograph when it is received. In addition, provide a detailed written description of the sample location in the log book.
15. Record all pertinent information in the field notebook. Data to be recorded include the date and time of collection, climatic conditions at the time of sampling, well sampling sequence, types of sample containers used, sample identification numbers, field parameter data, name(s) of collector(s), deviations from established sampling protocol (e.g., equipment malfunctions), purpose of sampling (e.g., surveillance, compliance), and collection of quality control samples. Also note any obvious stress to vegetation, which may be a result of contamination.

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Section 13.5.6

Sample Preservation



1. PURPOSE

The following SOP defines activities to be completed to properly preserve a water sample for shipment to an analytical laboratory for analysis.

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors when preserving water samples in the field.

3. PROCEDURES

Table 13.5.6-1 of this SOP lists recommended containers, preservatives, and holding times for individual analytes or analytical methods. The suggestions for sample storage and preservation presented are intended to serve as general guidelines. The analytical laboratories shall be consulted for the proper preservation and storage procedure for the analytical methods that will be used (e.g., this guideline recommends preservation of volatile organic samples with hydrochloric acid (HCl), but some laboratories require preservation with mercuric chloride).

Samples for volatile organics analysis (EPA 602, 624 or 8020) shall be collected in pre-cooled, pre-acidified, certified-clean 40 ml borosilicate vials with teflon septum caps supplied by the analytical laboratory. Samples to be analyzed for other constituents should be collected in appropriate containers as listed in Attachment 1 to this SOP.

4 ATTACHMENTS

- Table 13.5.6-1, Container/Preservative Reference Chart (5 sheets)

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TABLE 13.5.6-1. CONTAINER/PRESERVATIVE REFERENCE CHART
General/Inorganic Chemistry

Analysis	Container	Preservative (Chill to 40°C)	Holding Time (From Sampling Date)		
			Container	Water	Soil
	Water	Water	Soil	Water	Soil
Alkalinity	4 oz. Plastic	Unpreserved	N/A	14 days	N/A
Ammonia (NH ₃)	4 oz. Plastic	.25 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
BOD	16 oz. Plastic ^B	Unpreserved	N/A	48 hr.	N/A
Boron	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Bromide	16 oz. Plastic	Unpreserved	8 oz. jar	28 days	28 days
Chloride	4 oz. Plastic	Unpreserved	8 oz. jar	28 days	28 days
COD	4 oz. Plastic	.25 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
Color	4 oz. Plastic	Unpreserved	N/A	48 hr.	N/A
Cyanide (total and/ or amenable)	4 oz. Plastic	2 ml 1.5N NaOH ^B	4 oz. jar	14 days	No Specified Time
Electrical Conductivity	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Flashpoint	8 oz. Amber Glass w/Septum ^B	Unpreserved	8 oz. jar	28 days	28 days
Fluoride	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Formaldehyde	1 L Glass	1% Methanol	4 oz. jar	28 days-Pres. 7 days-Unp.	28 days
General Minerals • General Minerals • NO ₃ • Metals	1 L Plastic 4 oz. Plastic 16 oz. Plastic	Unpreserved .25 ml H ₂ SO ₄ ^A 1 ml HNO ₃ ^A	16 oz. jar	28 days	28 days
Gross Alpha/Beta	1 L Plastic	2 ml HNO ₃ ^A	4 oz. jar	6 mo.	6 mo.
Hardness	4 oz. Plastic	Unpreserved	N/A	28 days	N/A
Hexavalent Chromium (CR ⁺⁶)	16 oz. Plastic	Unpreserved	4 oz. jar	24 hr.	28 days

A - Typical volume needed to bring the pH to <2

B - Headspace free

C - Typical volume needed to bring the pH to >12

D - Typical volume needed to bring the pH to >9



TABLE 13.5.6-1. CONTAINER/PRESERVATIVE REFERENCE CHART (CONTINUED)
General/Inorganic Chemistry

Analysis	Container	Preservative (Chill to 40°C)	Container	Holding Time (From Sampling Date)	
	Water	Water	Soil	Water	Soil
Iodide	4 oz. Plastic	Unpreserved	4 oz. jar	24 hr.	28 days
Nitrate/Nitrite (NO ₃ /NO ₂) • NO ₃	4 oz. Plastic	.25 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
	4 oz. Plastic	Unpreserved	4 oz. jar	48 hr.	28 days
Odor	4 oz. Glass	Unpreserved	N/A	48 hr.	N/A
Oil & Grease	1 L Glass	2 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
418.1 (TPH by IR)	1 L Glass	2 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
pH	4 oz. Plastic	Unpreserved	4 oz. jar	immediately	14 days
Phenolics	4 oz. Amber Glass	.25 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
Phosphorus • Total (P)	4 oz./8 oz. Plastic	.25 ml/.5 ml H ₂ SO ₄ ^A	4 oz. jar	28 days	28 days
Phosphorus • Ortho (PO ₄)	4 oz./8 oz. Plastic (Filtered)	Unpreserved	4 oz. jar	48 hr.	28 days
Silica	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Solids (Residue) • Total dissolved • Total suspended • Total settleable • Total solids	16 oz. Plastic	Unpreserved	N/A	7 days	N/A
	16 oz. Plastic	Unpreserved	N/A	7 days	N/A
	1 L Plastic	Unpreserved	N/A	48 hr.	N/A
	16 oz. Plastic	Unpreserved	N/A	7 days	N/A
Specific Gravity	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Sulfate	4 oz. Plastic	Unpreserved	4 oz. jar	28 days	28 days
Sulfide	4 oz. Plastic	6 drops-2N Zn acetate & 8 drops 6N NaOH ^D	N/A	7 days	N/A
Sulfite	4 oz. Plastic	1 ml EDTA	N/A	28 days-Pres. 6 hr.-Unp.	N/A

A - Typical volume needed to bring the pH to <2

B - Headspace free

C - Typical volume needed to bring the pH to >12

D - Typical volume needed to bring the pH to >9

TABLE 13.5.6-1. CONTAINER/PRESERVATIVE REFERENCE CHART (CONTINUED)
General/Inorganic Chemistry

Analysis	Container	Preservative (Chill to 40°C)	Container	Holding Time (From Sampling Date)	
				Water	Soil
Surfactants (MBAS)	1 L Plastic	Unpreserved	N/A	48 hr.	N/A
Total Coliform	8 oz. Glass or Polypropylene (Sterilized)	0.008% $\text{Na}_2\text{S}_2\text{O}_3$	N/A	6-8 hr.	N/A
TKN (Kjeldahl Nitrogen)	4 oz. Plastic	.25 ml H_2SO_4^A	4 oz. jar	28 days	28 days
Total Organic Carbon (TOC)	4 oz. Amber Glass w/Septum ^B	.25 ml H_2SO_4^A	4 oz. jar	28 days	28 days
Total Organic Halide (TOX)	8 oz. Amber Glass w/Septum ^B	.5 ml H_2SO_4^A	4 oz. jar	7 days	No Specified Time
Total Radium	1 L Plastic	2 ml $\text{HNO}_3^{A,C}$	4 oz. jar	6 mo.	6 mo.
Turbidity	4 oz. Plastic	Unpreserved	N/A	48 hr.	N/A

A - Typical volume needed to bring the pH to <2

B - Headspace free

C - Typical volume needed to bring the pH to >12

D - Typical volume needed to bring the pH to >9



TABLE 13.5.6-1. CONTAINER/PRESERVATIVE REFERENCE CHART (CONTINUED)
Organic Chemistry

Analysis	Container (Glass- and Teflon-lined caps only)	Preservative (Chill to 40°C)	Container (Glass- and Teflon-lined caps only - Chill to 40°C)	Holding Time (From sampling date)	
	Water	Water	Soil	Water	Soil
8010/8020 • 8010 • 8020 • BTXE	3X VOA ^A 3X VOA ^A 3X VOA ^A 3X VOA ^A	3 drops HCl ^B 3 drops HCl ^B 3 drops HCl ^B 3 drops HCl ^B	4 oz. jar 4 oz. jar 4 oz. jar 4 oz. jar	14 days-Pres., 7 days-Unp. 14 days 14 days-Pres., 7 days-Unp. 14 days-Pres., 7 days-Unp.	14 days until Analysis 14 days until Analysis 14 days until Analysis 14 days until Analysis
Modified 8015 (TPH) • Gasoline Range • Diesel Range	4 oz. Amber Glass w/Septum ^A 2X VOA 4 oz. Amber Glass w/Septum ^A	.25 ml HCl ^B 3 drops HCl ^B .25 ml HCl ^B	4 oz. jar 4 oz. jar 4 oz. jar	14 days until Analysis 14 days until Analysis 14 days until Extraction 40 days after Extraction until Analysis	14 days until Analysis 14 days until Analysis 14 days until Extraction 40 days after Extraction until Analysis
8240	2X VOA	3 drops HCl ^B	4 oz. jar	14 days-Pres., 7 days-Unp.	14 days until Analysis
EDB	1 L Glass	Unp.	8 oz. jar	28 days until Analysis	28 days until Analysis
8040	1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
8080	2 x 1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
8100/8310	1 L Amber Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
8140	1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
8150	1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
Modified 619	1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
8270	2 x 1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
Modified 632	1 L Glass	Unp.	4 oz. jar	7 days until Extraction 40 days after Extraction until Analysis	14 days until Extraction 40 days after Extraction until Analysis
TCLP • Volatiles (zero headspace extraction) • Non-Volatiles	N/A N/A	N/A N/A	4 oz. jar 16 oz. jar	N/A N/A	14 days until Extraction 14 days after Extraction until Analysis 14 days until TCLP Leaching

A - Headspace free

B - Typical amount to bring the pH to <2

TABLE 13.5.6-1. CONTAINER/PRESERVATIVE REFERENCE CHART (CONTINUED)
Metals

Analysis	Container	Preservative	Holding Time (From Sampling Date)
WATER			
Metals (1 or more metals)			
• Total	16 oz. Plastic	1-ml HNO ₃ ^A	6 mo. (28 days-Hg)
• Dissolved • Filtered in Field	16 oz. Plastic	1-ml HNO ₃ ^A	6 mo. (28 days-Hg)
• Not Filtered	16 oz. Plastic (Specify "To be lab filtered")	Unpreserved	6 mo. (28 days-Hg)
• Organic Lead	8 oz. Amber Glass (Glass Only) w/Septum (Headspace Free)	Unpreserved Chill to 4°C	14 days until Analysis (laboratory recommended)
• Hexavalent Chromium (Cr ⁶)	16 oz. Plastic	Unpreserved	24 hr.
SOIL			
Metals (1 or more metals)			
• Total	4 oz. jar		6 mo.
• Soluble			
• EP Toxicity	8 oz. jar		6 mo.
• WET	8 oz. jar		6 mo.
• TCLP (see also Organic Chemistry)	8 oz. jar		6 mo.
• Hexavalent Chromium (Cr ⁶)	4 oz. jar		28 days
• Organic Lead	4 oz. jar	Chill to 4°C	14 days until Analysis (laboratory recommended)

A - Typical amount to bring the pH to <2.

Section 13.5.7

Sample Filtration



1. PURPOSE

The following SOP defines activities to be completed to properly filter water samples in preparation for analysis by an analytical laboratory.

2. SCOPE

This procedure is applicable to all DBS&A employees and its contractors and subcontractors when filtering water samples.

3. PROCEDURES

Recent research indicates that if samples are obtained correctly, field filtration for metals may not be necessary (Puls and Powell, 1992). However, filtration of samples to be analyzed for dissolved metals may be required in some cases. If filtration is required, it shall be outlined in the site specific sampling plan.

If filtration is required, filter the samples in the field if possible. If field filtering is not possible, preserve the sample by chilling to 4°C (i.e. do not add acid), and immediately ship the sample via overnight delivery to the laboratory. Indicate on the chain of custody that laboratory filtration and preservation are required.

Vacuum filtration of ground water samples is not recommended (Barcelona et al., 1985, pg. 65). Samples to be analyzed for TOC, VOCs or other organic compounds should not be filtered. Filtration may be performed on samples collected for analysis of dissolved metals, however.

The following procedure shall be followed to filter samples in the field with the GeoPump:

1. Connect the GeoPump to an automobile cigarette lighter or outlet if electricity is available.
2. Replace the tubing for the GeoPump at the beginning of each sampling round. If the samples are collected in any order other than most contaminated to least contaminated, or if very high levels of contamination are suspected or observed, then replace the tubing between each sample or as necessary.
3. If the tubing is not replaced between each sample, flush the lines with Liquinox followed by at least three flushes with distilled water.
4. Collect an unfiltered water sample as discussed in Sections 13.5.4 and 13.5.5 of the DBS&A Operations Manual.
5. Place the intake line in the unfiltered sample.
6. Pump at least a few hundred milliliters of the sample through the GeoPump prior to sample collection in order to flush the line. Set the GeoPump at the lowest rate possible in order to minimize aeration. Dispose of this water appropriately.



7. Place a disposable 45 micron filter on the output line. Direct the output stream below the filter into the pre-acidified sample container, as outlined in Section 13.5.6 of the DBS&A Operations Manual

4. REFERENCES

- Barcelona, Michael J., James P. Gibb, John A. Helfrich and Edward E. Garske. 1985. Practical Guide for Ground-Water Sampling. Prepared in cooperation with RSKERL, Ada, Oklahoma. SWS Contract Report 374. DBS&A #560/BAR/1985.
- Puls, Robert W. and Robert M. Powell, R.S. Kerr Environmental Research Laboratory (RSKERL). 1992. Acquisition of Representative Ground Water Quality Samples for Metals. *Ground Water Monitoring Review, Summer 1992.*

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Section 13.5.8

Quality Assurance/ Quality Control (QA/QC)

Section 13.5.8

**Quality Assurance/
Quality Control (QA/QC)**

Refer to Section 6.0 of the CAP for QA/QC procedures.

Section 13.6.1

Ground-Water Level Measurement



1. PURPOSE

The purpose of this procedure is to provide DBS&A personnel with the information necessary to collect accurate water-level data from ground-water wells. Water level measurements provide the fundamental data needed to determine aquifer characteristics; therefore, it is crucial that the appropriate methods are used to meet the data requirements of an aquifer investigation.

2. SCOPE

The following procedures are applicable to all DBS&A employees and subcontractors engaged in the measurement of ground-water levels in wells. Several methods are available for determining the depth to water (DTW); this SOP briefly describes methods used to measure water levels manually, and automatically with the help of data recorders. This information is intended to help DBS&A personnel determine the appropriate equipment to collect water levels for background trend analysis and aquifer tests.

3. PROCEDURES

Immediately following well construction (see Section 13.4.1 of the DBS&A Operations Manual), a measuring point shall be clearly labeled "MP" with a permanent marker at the top of the casing. The designated MP shall be located at a point which is unlikely to change in elevation during the life of the well. This will prevent repeated surveys to determine the reference elevation of the measuring point. If the MP does change, it shall be clearly re-marked and referenced to the original elevation or a new survey will be necessary. Water levels will be measured in accordance with ASTM D 4750, Standard Test Method for Determining Subsurface Liquid Levels in a Borehole or Monitoring Well (Observation Well).

The water level measurement (depth to water; DTW) shall be recorded on the Water Level Measurement Form included as Attachment 1 to this SOP (DBS&A Form No. 120). In addition, the following information shall be recorded on the form: the person making the measurement, the measuring device, the surveyed point from which the measurement is made, the time of day (military time), the date, the wellhead condition, and any measuring point (MP) changes.

Ground-water level data may also be recorded in the field log and on other applicable DBS&A forms including but not limited to those used for water sampling and drilling/soils logging.

The following subsections will describe the most commonly used techniques for obtaining water-level data in the field.

3.1 Steel Tape

Graduated steel tapes provide accurate measurements to within approximately 0.01 foot of the actual DTW for depths of 100 feet or less. The rigidity of the tape allows it to hang straight in the well. Steel tapes should generally not be used when many measurements must be made in rapid succession, such as during an aquifer test. Measurements with a steel tape are relatively time consuming.



When using a steel tape the lower 2 to 3 feet is wiped dry and coated with carpenters chalk or water finding paste before being lowered down the well. The tape is then lowered into the well to the estimated DTW. The tape should be held on a foot marker at the well-head measuring or reference point (MP). After removing the tape, the wetted end is read and subtracted from the previous reading; the difference is the actual DTW. If tape graduations are greater than 0.1 foot apart, a separate engineering tape or scale shall be used to accurately determine the wetted end measurement.

The steel tape should not stretch more than 0.05% under normal use and should not cause more than an 0.05-foot perceived rise in water level during measurement. If more than a 0.05-foot rise in water level occurs during measurement, a correction shall be made for the displacement. Steel tapes shall be calibrated against a surveyor's reference tape annually by the DBS&A Environmental Equipment Coordinator. Information from these calibrations shall be kept on hand at the DBS&A equipment supply facility.

The main disadvantage of the steel tape method is that the approximate depth to water must be known prior to the measurement. In addition, interferences such as cascading water, smearing, and/or evaporation may compromise the accuracy of the wetted-end measurement. However, steel tapes are relatively inexpensive and generally more durable than electrical instruments for measuring water levels.

3.2 Electrical Sounders

Electrical sounders operate by completing a circuit when the probe contacts the water level. Upon completion of the circuit a light, buzzer, or ammeter needle indicates that the probe is in contact with the water table. The probe is connected to a graduated tape, usually made from plastic and fiberglass. Batteries supply the necessary current through electrical wires contained in the graduated tape. Measurements are commonly made to within 0.01 foot with electrical sounders.

Electrical sounders are the most commonly used ground-water level measuring device on DBS&A projects. The major advantage of electrical sounders is that many measurements can be made rapidly and accurately without removing the probe from the well. Field personnel should position themselves near the MP so the DTW can be read at eye level. A second check reading should be taken before withdrawing the electric tape from the well. Most DBS&A sounders are marked every 0.02 foot.

The length of the electric line shall be calibrated annually with an engineers tape by the DBS&A Environmental Equipment Coordinator. Information from these calibrations shall be kept on hand at the DBS&A equipment supply facility.

Potential disadvantages of the electrical sounder devices include: the expense of an accurate sounder; inaccurate measurements that may be made due to stretching or kinking of the tape; electrical shorts that may be caused by broken or corroded wires; false readings due to cascading water; snagging of the sounder tip on pump columns and cables; or incomplete circuits due to low concentrations of total dissolved solids in the water.



3.3 Automated Water Level Measurements

To determine background water level trends, the most economic approach is to set up a continuous data recorder capable of making many measurements automatically. Driscoll (1986) discusses the application and installation of such systems in detail. The most common recorders produce a graphical chart or store the data electronically for future retrieval. Continuous water level records are quite useful for determining daily and seasonal fluctuations resulting from recharge and discharge periods, evapotranspiration and tidal stress, and during aquifer tests when there are not enough field personnel to collect all the necessary data. The following paragraphs briefly review equipment used with continuous recorders to measure water levels.

Automated pressure transducers are useful for collecting large quantities of water-level data rapidly during labor intensive aquifer tests. DBS&A owns an electronic data logging system consisting of a Campbell Scientific 21X data logger and DRUK pressure transducers which can be calibrated to output feet of water above the transducer. Refer to Section 13.6.4 of the Operations Manual for detailed information on using the system. The system can be programmed to collect data on arithmetic and logarithmic time scales. Measurements are accurate to approximately 0.01 foot providing there is no turbulence in the well.

Airline bubblers are commonly used by the U.S. Geological Survey for measuring stream stage and water levels in wells over periods of several years. Airline bubblers usually operate on nitrogen gas. The device works on the principal that the gas pressure required to push all the water out of the submerged portion of the tube equals the water pressure of a column of water equal to that height. Measurements are accurate to within 0.01 foot.

Float sensors can also be used to determine long term variation in background water levels. Float sensors consist of a tape or cable passing over a pulley with a float attached to one end and a counterweight attached to the other. The float follows the rise and fall of the water level. A graphic or electronic recorder is attached to the calibrated pulley to store the water level data. Float sensors work best in large diameter wells (4 inches or greater). The greatest disadvantage of this method is the potential for the float to stick on the side of the casing or jump the pulley resulting in a "stair stepping" record or no record at all. Measurements are accurate to 0.1 foot or greater depending on the precision of the recorder and pulley calibration.

4. ATTACHMENTS

1. Water Level Measurements (DBS&A Form No. 120)

5. REFERENCES

ASTM. 1990. Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers. Standard D 5092-90. Philadelphia, PA.

Driscoll, F.G. 1986. Groundwater and Wells. Johnson Division. St. Paul, MN. 1089 p.



DANIEL B. STEPHENS & ASSOCIATES, INC.

ENVIRONMENTAL SCIENTISTS AND ENGINEERS

Procedure
Ground-Water Level Measurement
SECTION 13.6.1

Effective 06/01/93 • Supersedes n/a • Page 4 of 5

Prepared by: Bob Marley

Reviewed by: Frank M. L...
Quality Assurance Manager

Approved by: D.B. Stephens
Daniel B. Stephens

Reviewed by: Frank M. L...
Systems Operations Manager



Project Name _____ Measurement Date _____

Project Number _____ Field Staff _____

Measuring Points and Datum Used _____

Observations _____

[illegible]

Signature _____ Date _____

Section 13.6.2

Slug Testing



1. PURPOSE

The following SOP describes procedures for performing various types of aquifer slug tests in the field.

2. SCOPE

The procedures listed below are applicable to all DBS&A employees, its contractors and subcontractors, for performing aquifer slug tests. The procedures for obtaining the necessary data in the field are described herein; the procedures for analyzing the data to calculate aquifer hydraulic properties are described in Section 14 of the DBS&A Operations Manual.

3. PROCEDURES

The procedures described below for performing slug tests are applicable to all aquifer types. Where a variation in methodology occurs with a particular aquifer type, it will be noted. These procedures are in accordance with ASTM D 4044-91, Standard Test Method (Field Procedure) for Instantaneous Change in Head (Slug Tests) for Determining Hydraulic Properties of Aquifers. Additional references which may be helpful in planning and performing slug tests are Groundwater and Wells (Driscoll, 1986), and Analysis and Evaluation of Pumping Test Data (Kruseman and de Ridder, 1992).

3.1 Slug Testing

The slug test method involves creating a sudden change in head in a well and measuring the resulting water level response. Head changes are induced by suddenly removing or adding a known quantity of water in the well. This can be accomplished by removing a bailer full of water from the water column, placing a mechanical slug into the water column, or increasing/decreasing the air pressure in the well casing. From these measurements, the aquifer's transmissivity or hydraulic conductivity can be determined. Various analytical techniques allow for the estimation of coefficient of storage but should be considered less reliable than the estimate of transmissivity.

Slug tests are an inexpensive and rapid method of obtaining estimates of aquifer properties. No pumping is required in the slug test and no piezometers are required to be monitored. The main limitation of this test is that this method is only capable of determining the characteristics of a small volume of aquifer material surrounding the well. This material may have been disturbed during well drilling and construction and, as a result, may have a large impact on the results of the test. Additionally, only slug withdrawal test methods should be used for unconfined aquifers.

3.1.1 Required Preliminary Hydrogeologic Information

All available information pertinent to the slug test should be reviewed prior to the start of the test. This information will aid in preparing design specifications for the test. This information includes aquifer properties, such as aquifer type (confined, unconfined, etc.), aquifer thickness, aquifer boundaries, and any previous estimates of hydraulic properties, if available. Information on well construction details are also



needed prior to the test. This includes geologic logs, well construction logs, screen interval and size, sand pack interval and size, borehole diameter, and casing diameter.

3.1.2 Water Level Measurements

Water levels should be measured immediately prior to the test, and throughout the test until water levels in the test well reach approximately 95% of the pre-test level. Water level response during the slug test will be measured as described in Section 13.6.1 of the DBS&A Operations Manual. Because water levels are dropping fast immediately after slug emplacement, measurements should be taken at brief intervals during this time. As recovery continues, the intervals can be gradually lengthened. Readings collected during the slug test should be recorded on Form No. 124, Slug Test Measurements.

3.1.3 Slug Test by Water Withdrawal

Water can be rapidly removed from a test well with the use of a bailer. In this method, a bailer of known volume is lowered below the water level in the test well. After it has been determined that the water level in the control well has recovered to within 95% of static, the bailer is rapidly removed from the water column. Water level recovery within the well is then measured and recorded until the water level has recovered to 95% of the background level. The bailer should be of sufficient size to ensure a proper water level response during removal from the water column.

A submersible pump can also be used to rapidly withdraw water from the test well. The pump will need to remove a sufficient volume of water from the test well in a matter of seconds. Care should be taken to ensure that water does not backflow into the well when the pump is shut off.

3.1.4 Slug Test by Mechanical Slug Injection

A mechanical slug constructed of nonporous material with a density greater than water can be rapidly lowered into the water column of the test well creating a nearly instantaneous rise in water level. The resulting water level recovery is then measured and recorded in the test well until the water level reaches approximately 95% of the background level.

3.1.5 Slug Test by Air Injection

Slug withdrawal can be simulated by injecting air into a well which has an airtight cap. This is accomplished with the use of an air pressure pump and regulator. In this method, the well is pressurized by the injection of air into the airtight test well. The injection of air into the well causes the water level in the test well to drop. Once the water level has stabilized, the pressure is released creating a sudden change in head. Water level recovery will need to be measured with the use of a pressure transducer connected to a data logger. This method requires that the test well be screened in the saturated portion of the aquifer.



3.1.6 Slug Test by Vacuum Withdrawal

The injection of a slug can be simulated by applying a vacuum to an airtight test well. This method requires the use of a vacuum pump and regulator. In this method, a steady vacuum is applied to the test well which creates a rise in water level. After the water level in the test well has stabilized, the vacuum is released which creates a sudden change in head. The water level recovery is then measured with the use of a pressure transducer connected to a data logger. This method requires that the test well be screened entirely in the saturated portion of the aquifer.

4. ATTACHMENTS

1. Slug Test Measurements (DBS&A Form No. 124)

5. REFERENCES

Driscoll, F.G. 1986. Groundwater and Wells, Second Edition. Johnson Filtration Systems, Inc., St. Paul, Minnesota.

Kruseman, G.P. and N.A. de Ridder. 1992. Analysis and Evaluation of Pumping Test Data, Second Edition. International Institute of Land Reclamation and Improvement.

Prepared by:

Reviewed by:

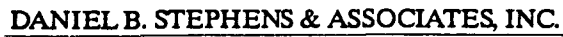
Quality Assurance Manager

Approved by:

Daniel B. Stephens

Reviewed by:

Systems Operations Manager



Project Name _____ Test Date _____

Project Number _____ **Field Staff** _____

Well Number and Datum Used _____

Slug Type (material, volume, etc.) _____

Observations _____

[illegible]

Signature _____ Date _____

Transwestern Pipeline Company

J. A. "Joe" Hulscher
Vice President
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June 28, 1996

VIA HAND DELIVERY

Honorable Mark E. Weidler, Secretary
New Mexico Environment Department
Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico

Re: Transwestern Pipeline Company Roswell Compressor Station

Dear Mr. Secretary:

On behalf of Transwestern Pipeline Company (Transwestern) please find enclosed a copy of a proposed settlement agreement between Transwestern and the State of New Mexico Environment Department (NMED) which covers former surface impoundments at the Roswell Compressor Station. As promised, the settlement agreement includes a detailed alternative closure plan for the former surface impoundments. The plan is similar to the prior plan but it is both simpler and more comprehensive.

The original plan devoted considerable discussion to a description of the compressor station and the numerous investigations voluntarily conducted both prior to and subsequent to the time when Transwestern brought conditions at the station to the attention of the State of New Mexico. The descriptive and historical material has essentially been left unchanged. Further, much of the QA/QC section has remained unchanged.

The present plan has been updated to include the results of the 1995 Phase I assessment and proposed Phase II assessment at the former surface impoundments. The plan has been expanded by including: a proposed remedial technology to remove contaminants from the soil and groundwater at the former impoundments, target cleanup levels for the contaminants in the soil and the groundwater and a proposed schedule.

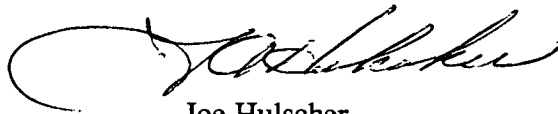
The cleanup levels are derived from several sources. First, soil cleanup standards for the majority of compounds other than petroleum hydrocarbons are based upon cleanup standards developed by the State of Texas for both RCRA and non-RCRA sites. These standards, known as Tier II standards, are based upon a conservative generic risk assessment and are considerably more conservative than the EPA proposed RCRA Subpart S standards for cleanup of the soil. Second, the groundwater cleanup standards are primarily based upon New Mexico Water Quality Control Commission standards. Finally, the hydrocarbon related compounds, Total Petroleum Hydrocarbons (TPH), Benzene, Toluene, Ethyl benzene, and Xylene (BTEX) concentrations are based upon New Mexico Oil Conservation Division (OCD) guidance. These standards are fully protective of human health and the environment and are based upon a combination of existing New Mexico standards and conservative risk based standards developed for similar RCRA programs. Transwestern proposes these standards despite the naturally poor quality of the groundwater at the station. In light of the conditions at the site and the conservative nature of the target cleanup levels Transwestern has included the opportunity to demonstrate by acceptable risk assessment methods that less conservative standards may be appropriate.

In recent correspondence provided by the NMED it appears that there may still be some confusion over exactly why Transwestern has taken the position that no hazardous waste was ever disposed of in the surface impoundments. It is Transwestern's understanding that the only issue in dispute is whether any 100% concentration chlorinated solvents were disposed of in the surface impoundments. Transwestern's position is based upon the fact there is no evidence that any chlorinated solvents in 100% concentrations were ever disposed of in the former surface impoundments. During the period that the former impoundments were in operation, no later than November 1983, there is no evidence that any 100% concentration chlorinated solvents were placed in the impoundments. The only information that is available is that during this time frame such compounds were used in less than 100% solutions. Under the regulations in effect at the time such compounds were considered non-hazardous. Solvent mixtures were defined by the EPA as hazardous effective January 30, 1986, many years after the use of the surface impoundments had ceased. For the purposes of this analysis, Transwestern is not relying on the oil and gas exclusion found under 40 C.F.R. §261.4(b)(5).

The enclosed plan is consistent with our discussion at the March 3rd meeting and subsequent discussions by counsel. The intent of the settlement and the plan is to minimize the transactional time for both parties to finish the assessments and implement full remediation. Under the agreement the NMED will be kept fully apprised of all Transwestern actions and have full opportunity to observe field activities. The plan and the settlement agreement provide a reasonable, balanced approach to resolving the disputed issues between the NMED and Transwestern in the hopes of avoiding further delay and legal proceedings. Transwestern's proposal preserves both the NMED's statutory responsibilities and Transwestern's position. Most importantly, the settlement agreement and alternative closure plan provide a sensible, efficient and effective approach to conducting the remaining assessments and remediation both on and off the station in a timely manner.

Once you and your staff have had a chance to review the enclosed materials, please contact us. In the event there are any questions, I would suggest counsel for the NMED contact their counterparts for Transwestern, either Richard Virtue (505/983-6101) or Lou Soldano (713/853-7237) and technical issues be directed to either Bill Kendrick (713/646-7644) or Larry Campbell (505/625-8022). Transwestern looks forward to hearing from you soon and resolving this matter in an expeditious and mutually cooperative fashion.

Sincerely,



Joe Hulscher

cc: Benito Garcia - NMED
Susan McMichael, Esq. - NMED
Louis P. Soldano, Esq.
Richard L. C. Virtue, Esq.
Bill Kendrick
Larry Campbell

cc: w/out attachments
Roger Anderson - OCD

soldano\ltrs\weidler.doc

SETTLEMENT AGREEMENT

SETTLEMENT AGREEMENT

This settlement agreement ("Settlement Agreement" or "Agreement") is made between the New Mexico Environment Department ("NMED") and Transwestern Pipeline Company, a wholly owned subsidiary of ENRON Operations Corp ("Company").

In consideration of the mutual covenants set forth in this Settlement Agreement, the parties agree:

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1. Statement of Dispute.

a. Background. The Company owns and operates a natural gas compressor station located nine (9) miles north of the city center of Roswell, County of Chaves, State of New Mexico, along the east side of U.S. Highway 285 (the "Compressor Station" or "Facility").

The primary function of the Facility is to compress natural gas for transportation through a pipeline. A secondary function of the Facility is to remove pipeline liquids from the pipeline. These liquids collect in low spots in the pipeline or in flow-through vessels designed to knock out the liquids ("scrubbers"). Liquids are also periodically removed from the pipeline during "pigging" operations. During pigging operations, plugs or "pigs" are shoved through the pipeline to push out the liquids. The liquids collected at a compressor station from "pigging" operations and the scrubbers are called pipeline liquids or "condensate".

The Compressor Station has been in operation since 1960. The only environmental permit currently applicable to the Facility is Discharge Plan GW-52 issued by the Oil Conservation Division of the New Mexico Energy and Minerals Department ("OCD"). The Company filed with NMED a Part A application under the Federal Conservation Recovery Act 82 USC §6991 et seq. ("RCRA") in January, 1993, at the request of NMED, for the purpose

of gathering information concerning closure of former surface impoundments at the Facility. Two surface impoundments were used at the Facility from 1960 through 1983 and have been replaced by above-ground storage facilities. The two former surface impoundments and the areas impacted by contamination from the impoundments are the sole subject of this Agreement and are defined for purposes of this Agreement as the "Site".

b. Description of Contaminants Used in the Past at the Compressor Station.

The primary function of the former surface impoundments was to contain pipeline condensate removed from the pipeline through pigging operations. Pipeline condensate is a mixture of hydrocarbon liquid and water that accumulates during periodic cleaning of the pipeline. Pipeline condensate may also contain lubrication oil blow-by from up stream compressors. Lube oil blow-by is crank case lubricating oil that bypasses a compressor and enters the pipeline.

Hydrocarbon liquid and soil sampling conducted at the Facility in June, 1995 show that greater than 99.9% of the contaminants present at the former surface impoundments at the Compressor Station are petroleum hydrocarbons. The results further show chlorinated compounds to be present in concentrations that total less than 20 mg/kg (ppm). The Company believes that these contaminants were inadvertently released into soil and groundwater as a result of past waste management practices which were common at the time. The contaminants which have given rise to the issue of regulatory oversight at the Facility are likely components of cleaning solutions (chlorinated solvent compounds) which were once used during engine

maintenance activities but are no longer used at the Compressor Station. These compounds represent a small fraction of the contaminants present in soil and groundwater.

On December 31, 1985, EPA adopted a solvent rule effective January 30, 1986, that defined certain solvents that have been mixed with wastes not subject to RCRA as "hazardous" wastes under RCRA. 50 Fed. Reg. 53315. Prior to the adoption of the present EPA solvent rule, the waste generated by chlorinated solvent products containing less than 100% of a specific listed solvent were not "hazardous" within the meaning of RCRA. Id. Solutions containing 100% solvent concentrations were not used at the Facility prior to the adoption of the solvent rule. After the adoption of the present solvent rule, there were no releases to the surface impoundments.

During prior investigation activities conducted at the Site, the highest concentration measured of 1,1,1-trichloroethane, the most prevalent solvent detected at the site, was 19.0 mg/kg (or ppm). This concentration is well below the RCRA 40 C.F.R 264 proposed Subpart S action level of 7000 mg/kg. 55 Fed. Reg. 30867.

c. Dispute Concerning Applicability of RCRA to Remediation of Releases From Former Surface Impoundments at Company's Compressor Station. In connection with preparation of a closure plan requested by NMED, the Company assumed that wastes listed as hazardous under 40 C.F.R. §§261.24 and 261.31(a) ("F-listed" and "D-listed" wastes) were placed in the surface impoundments. Subsequent investigation by the Company has resulted in the conclusion by the Company that no F-listed or D-listed wastes were placed in the surface impoundments.

Information submitted with the Part A RCRA application submitted by the Company indicated that only a single surface impoundment was in use from August 1960 through June 1986. Information obtained from historical air photos and facility diagrams indicates that two impoundments were used at the facility between mid-1960 and December 1983. From a closer review of the information, the Company concluded that the first impoundment at the facility was replaced by the second impoundment sometime prior to October 1972. Therefore, only the second impoundment was operated after the adoption of RCRA. The Company believes that wastes were not received by this impoundment after November 1983 when the final above ground storage tanks ("ASTs") were placed in service to collect the Facility's waste streams. Completion reports dated June 25, 1982, November 18, 1983 and January 25, 1984 show that the final storage tank was installed and operational by November 11, 1983. Aerial photos dated June 19, 1983 show surface impoundments and in-place storage tanks.

The Company believes that all of the wastes listed on Company's RCRA Part A application should never have been listed for the following reasons: they were insufficient amounts or concentrations (e.g. arsenic, barium), the solvent products used were in diluted solutions of much less than the required 100% concentration, (e.g. F001 and F005 wastes), the waste category did not exist at the time the wastes were released, or they were not classified as wastes under RCRA at the time they were released (e.g. Benzene).

The Company believes that any wastes that were not defined as hazardous when released do not fall under RCRA, unless characteristically hazardous and actively managed after the date the rule changed to classifying the waste as hazardous.

The Company relies on several authorities in support of its position that RCRA does not apply to past releases of waste to the surface impoundments. The Company cites the solvent rule as expressing EPA's intent that the rule applies only to waste being "managed" on the effective date of the rule. 50 Fed. Reg. 53315. The Company relies in part on EPA's rule on the mining waste exclusion 54 Fed. Reg. 36592. The EPA stated, in narrowing the exemption for mineral processing wastes, at 54 Fed. Reg. 36597, that the new, narrower, definition would "not impose Subtitle C requirements on . . . wastes that were released prior to the effective date of today's rule, unless they are actively managed after the effective date". The EPA also stated in adopting the mining exclusion rule that it has a "longstanding policy of not regulating wastes under RCRA that were released prior to the effective date of the rule governing those wastes". *Id.* The Company also relies on the fact that EPA took the same position in 1992 when it added new wastes to the hazardous list. 57 Fed. Reg. 37284.

On October 11, 1995, the Company submitted the results of its additional investigation and analysis to NMED. After further correspondence and discussions with NMED, the Company withdrew its Part A RCRA Application and Closure Plan on January 19, 1996.

Notwithstanding the Company's additional investigation and analysis, NMED believes RCRA applies to the remediation of the Site.

2. Compromise and Settlement. This Agreement is executed by the parties for the sole purpose of compromising and settling all disputes concerning contamination at the Site. Nothing in this Agreement shall be construed as an admission by either party of the validity of the position of the other party.

In consideration of signing this Agreement, the parties will be obligated to and bound by all terms and conditions of this Agreement, including the assumption by Company of all costs for the implementation and execution of remedial proposals and actions required of Company by this Agreement. NMED agrees not to pursue any other relief, civil, criminal or administrative, including NMED's right to seek and recover penalties for past violations against Company, its successors, assigns and employees, that NMED might have obtained against Company under the factual allegations to the effective date of this Agreement set forth in the above Statement of Dispute; except that NMED retains the right to seek enforcement of this Agreement pursuant to paragraph 16, to seek and collect penalties as provided by paragraph 19, and to pursue civil, criminal or administrative relief for future violations.

The parties agree that they will act reasonably and in good faith at all times to accomplish the purpose of this Agreement, and will perform all evaluations required by this Agreement using sound scientific judgment.

3. Agreement Binding on Successors in Interest. The provisions of this Agreement shall apply to and be binding upon NMED, its successor agencies of government, their employees, administrators, contractors, consultants and agents, and upon Company, its officers, directors, agents, employees, receivers, successors, trustees, assigns, heirs, executors and contractors. This Agreement is not binding upon any other state or federal regulatory agency.

4. Alternative Closure Plan. Company will immediately upon signing this Agreement undertake the steps set forth in the Alternative Closure Plan attached to this

Settlement Agreement and incorporated into this Settlement Agreement as if fully set forth herein.

a. Implementation In Accordance With Phase II Assessment Plan. The Company has prepared and submitted to NMED a Phase II Assessment Plan, and will continue its assessment in accordance with the findings of or resulting from such assessment plan.

b. Documentation of Final Disposition of Removed Waste. When performing all containment and remediation activities, Company shall document the amounts of waste removed from the soil and groundwater by Company or its contractors. Such documentation shall be specific as to dates and quantities, including a description in gallons of soil, water, and commingle removed, and the subsequent method(s) of disposal. All soil and liquid waste generated from containment and remediation activities will be evaluated for hazardous characteristics. A verification sample of each potential waste stream will be analyzed by the appropriate analytical method. If the waste after verification sampling shows that a waste is characteristically hazardous, the waste will be treated, stored or disposed of under applicable hazardous waste regulations. All waste which is not characteristically hazardous will be handled under applicable nonhazardous waste regulations.

c. Annual Progress Reports. Company shall submit annual reports as described in the Alternative Closure Plan to NMED until its obligations under this Agreement are terminated under paragraph 21 of this Agreement. These reports shall document any and all work performed during the previous twelve months. Information supplied in these annual

reports shall include information set forth in Sections 4.8 (soil assessment), 5.9 (groundwater assessment) and 8.2 (routine reporting) of the Alternative Closure Plan.

d. Review and Alternate Remediation Proposal. Company and NMED shall review the progress of remediation through study of technical information or performance assessment provided in the reports required in the Alternative Closure Plan, from time to time as requested by the Company. The review shall include the prospects of meeting the remediation criteria in the Alternative Closure Plan. If the Company determines upon review that the remediation criteria is technically incapable or technically impracticable to achieve as provided in Section 7.5 of the Alternative Closure Plan, Company shall submit, within one hundred and eighty (180) days of that review decision, a proposal for alternative remediation containing alternate remediation technology. The proposal shall be reviewed, and commented upon in writing by NMED.

5. Monitoring, Sampling and Analysis Procedure. All sampling performed and analyses submitted pursuant to this Agreement shall be in accordance with the Quality Assurance Project Plan set forth in Section 6 of the Alternative Closure Plan.

The following information shall be submitted to NMED prior to construction for all wells installed under this Agreement:

- (1) type of drilling, drilling procedure and well-construction methods;
- (2) dimensions and types of well casing and screen material;
- (3) backfill material and procedures;

(4) sampling procedures, including collection, preservation, shipment and storage;

(5) water level measuring equipment and practice;

(6) analytical instruments, methods and laboratories;

The following information shall be submitted immediately after construction of all wells installed under this Agreement:

(7) all fluid-level, water-quality and stratigraphic data, including depths to petroleum products and/or water encountered both during drilling and after well construction;

(8) all raw data from pumping or injection tests in the aquifer;

(9) all field observations of odors;

(10) results of all chemical, physical or biological analyses of water, petroleum products or soils; and

(11) type of earth material encountered during drilling.

6. Report Compliance and Noncompliance. All studies, reports, schedules, and attachments required by the terms of this Agreement shall be submitted to NMED for review and comment. If comments from NMED are not received by the Company within thirty (30) days of the date submitted to NMED the Company may proceed as if NMED has no comments. Any noncompliance with such studies, reports, schedules, or attachments shall be deemed a violation of this Agreement.

7. NMED Assistance in Gaining Access. To the extent that it is necessary for Company to gain access to any areas controlled by third parties, Company shall attempt to make such agreements with third parties as are necessary. In the event Company is unable to gain access to selected sites and no other suitable substitute sites are available, NMED shall assist Company in gaining access to sites controlled by third parties provided such assistance is consistent with NMED's statutory authority. NMED will assist Company in obtaining municipal, county, or other administrative approval for access when so requested by Company provided such assistance is consistent with NMED's statutory authority. Further, NMED will encourage off-site land owners to grant access to Company to accomplish the purposes of this Agreement.

8. Company to Provide Access to NMED. Company shall provide access to the Site and any other areas upon which remediation occurs to NMED employees and to NMED's contractors and consultants at all reasonable times. NMED shall give twenty-four (24) hours notice by facsimile transmission prior to entering the Site for sampling monitoring wells. Company shall permit such persons to be present and move freely in the area at all times during which work is being conducted pursuant to this Agreement. Upon twenty-four (24) hours by facsimile transmission notice by NMED, an authorized representative of Company will be available to accompany NMED's employees, contractors, and consultants while on Site. NMED's employees, contractors, and consultants will abide by Company's safety requirements and procedures while on Site or at the Facility. In the event of an emergency,

NMED need not give notice of entry, but may act in accordance with the breadth of its statutory authority.

9. NMED Assistance in Obtaining Permits, Authorization. Assistance by NMED in obtaining permits, releases, or other types of permission or authorization from governmental agencies and political subdivisions, shall be limited to a formal statement of its approval of Company's reclamation proposal and a statement that such proposal is required by or is consistent with the terms and obligations of this Agreement. NMED agrees not to hinder, or interfere with, any negotiations by or between Company and the State Engineer, the County of Chaves, or any federal, state, local or private entity or agency, which are consistent with the object and terms of this Agreement.

10. Split Samples. Prior to the taking of samples, Company shall give NMED forty-eight (48) hours notice of sampling and thus provide NMED the opportunity to split samples.

11. Notice. Whenever under the terms of this Agreement, notice or information is required to be forwarded by one party to another, it shall be directed to the individuals at the addresses specified below, unless those individuals or their successors give notice in writing to the other parties of another individual designated to receive such communications. Notice or the supplying of information required under this Agreement more than seven (7) days in advance shall be perfected upon the mailing of such information or notice by first class mail. Notice or the supplying of information required under this Agreement less than seven (7) days in advance shall be perfected upon the facsimile transmission of such information or notice.

FOR NMED

Benito Garcia
Hazardous Materials &
Remediation Bureau
Environmental Improvement
Division
1190 St. Francis Drive
Santa Fe, New Mexico 87503
Phone: (505) 827-
Fax: (505) 827-1628

and

Susan McMichael
Office of General Counsel
Health & Environment Department
1190 St. Francis Drive
Santa Fe, New Mexico 87503
Phone: (505) 827-0127
Fax: (505) 827-2836

and a copy to

Roger Anderson
Oil Conservation Division
New Mexico Energy and
Minerals Department
2040 South Pacheco
Santa Fe, NM 87505
Phone: (505) 827-
Fax: (505) 827-

FOR COMPANY

Name _____
Title _____

Address _____

Phone _____
Fax _____

and

Name _____
Title _____

Address _____

Phone _____
Fax _____

12. Exchange of Information. Routine communications may be exchanged between the parties and their consultants to facilitate the orderly conduct of work contemplated by this Agreement, but no such communication shall alter or waive any rights and/or obligations of

the parties under this Agreement. The parties agree to routinely exchange technical data developed pursuant to this Agreement, or which is in possession of the parties upon execution of this Agreement, upon request by one party to the other, unless such data is privileged from disclosure. Company may confer with NMED at any time prior to the submittal of any proposals, reports or other documents required by this Agreement.

13. Amendments by Company. At the request of Company, any proposal or schedule may be amended or extended according to the following procedure. Within thirty (30) days of the presentation by Company of its proposed amendment or extension, NMED shall review it and notify Company in writing of any comments. Company may modify the proposal to eliminate the deficiencies specified by NMED and submit a revised, amended proposal to NMED for review and comment.

14. Compliance with Applicable Law. All actions required by this Agreement shall be undertaken in compliance with the requirements of all applicable federal, state, and local laws and regulations.

15. Resolution of Disputes Under the Agreement. If Company has any objections to the decision by NMED regarding termination under paragraph 21 of this Agreement, or any other decision required of NMED under the Alternative Closure Plan, Company shall notify NMED in writing of its objections within thirty (30) days of such decision. The parties shall then have an additional thirty (30) days from the receipt by NMED of the notification of objection to reach agreement. If agreement cannot be reached within this period of time, NMED will issue its final decision, including a statement of the reasons for its approval or

disapproval. Final action by NMED shall be binding upon the parties unless Company files a request for mediation of the dispute. If the Company files a request for a mediation, the parties shall jointly designate a mediator for purposes of this Agreement. If the parties cannot agree on a mediator, a mediator shall be designated by the chief judge of the state district court for Chaves County. If after sixty (60) days from selection of a mediator the dispute has not been resolved, the NMED decision shall be a "final action" for purposes of this Agreement. The Company may file an action for the modification or setting aside of such final action of NMED.

16. Court Jurisdiction and Venue. The parties agree that Company may seek judicial review of NMED final action by filing an action in the district court for Chaves County, New Mexico, within thirty (30) days of the date of the NMED final action, to modify or set aside the action. Judicial review of NMED final actions shall be in accord with applicable standards for judicial review of administrative decisions. Additionally, the parties agree that this Agreement shall be enforceable by either party by the filing of a civil action in the district court for Chaves County. In the event of such civil action, the parties agree that such court has jurisdiction over the subject matter of this Agreement and the parties hereto waive their right to challenge such jurisdiction either in the district court for Chaves County or any other forum. Any penalties which accrue pursuant to paragraph 19 herein shall be tolled during the time Company is judicially appealing the final action.

17. Third Party Actions. Nothing contained in this agreement shall affect any right, claim, cause of action or defense of any party hereto with respect to third parties.

18. Notice to Successors by Company. Company shall give notice of this Agreement to any successor in interest prior to transfer of any rights held by Company in the site, and shall simultaneously verify to NMED that such notice has been given. Company shall be relieved of its obligation to give notice to successors in interest upon termination of its obligations under this Agreement pursuant to paragraph 21.

19. Stipulated Penalties for Noncompliance. If Company fails to comply with any of the requirements of this Agreement, Company shall pay a penalty of two thousand five hundred dollars (\$2,500.00) for each day of each violation of such requirements. Payment for any violation shall be made by certified check payable to the State of New Mexico, c/o NMED, and shall be mailed to the New Mexico Environment Department, Office of General Counsel, at the address in paragraph 11 above.

20. Computation of Time. In computing any period of time prescribed in this Agreement, the day of the act, event, requirement or default for which the designated period of time begins to run shall not be included. The last day of the period so computed shall be included, unless it is a Saturday, Sunday or legal holiday, in which event the period runs until the end of the next day which is not a Saturday, Sunday or legal holiday.

21. Termination. Company's obligations under this Settlement Agreement shall terminate upon the Company's certification to NMED in writing that all programs required in paragraph 4 have been completed by Company and that the standards and criteria of the Alternative Closure Plan have been met.

Upon termination of Company's obligations under this Settlement Agreement, NMED shall provide Company with a release of liability. NMED shall, thereafter be forever barred from pursuing any judicial, administrative, or other action against Company arising out of or relating in any way to the subject matter of this Settlement Agreement.

22. Suspension of Obligations. The obligations of Company under this Agreement shall be suspended if and while delayed or interrupted by storm, flood or other act of God, by fire, vandalism, by insurrection, rebellion, riots, strikes or governmental actions including but not limited to actions by agencies of the state of New Mexico. In such instance, Company shall immediately notify NMED in writing, identifying in detail the cause excusing its noncompliance, all steps Company has taken to mitigate the cause and its effect on Company's ability to comply, and the expected duration of the suspension. The duration of such delay or interruption shall not be considered as a period of non-compliance with this Agreement; provided, however, that Company acts at all times in good faith to avoid the occurrence of any of these events and has no responsibility for their occurrence. Company agrees that neither failure to timely order equipment nor failure to apply in a timely fashion for required permits shall be considered justification for suspension of obligations within the meaning of this paragraph.

23. Merger. This Settlement Agreement contains all the terms of the settlement agreement between the parties, there being no oral agreements not contained herein.

This Agreement is effective when signed by all parties to this Agreement.

FOR COMPANY

Name _____

Title _____

Address _____

DATE: _____

Name _____

Title _____

Address _____

DATE: _____

**FOR THE NEW MEXICO
ENVIRONMENT DEPARTMENT**

By _____

1190 St. Francis Drive
Santa Fe, New Mexico 87503

DATE: _____

Office of General Counsel
New Mexico Environment
Department
1190 St. Francis Drive
Santa Fe, New Mexico 87503

DATE: _____

settlemt.doc

This Agreement is effective when signed by all parties to this Agreement.

FOR COMPANY

Name _____
Title _____
Address _____

DATE: _____

Name _____
Title _____
Address _____

DATE: _____

**FOR THE NEW MEXICO
ENVIRONMENT DEPARTMENT**

By _____

1190 St. Francis Drive
Santa Fe, New Mexico 87503

DATE: _____

Office of General Counsel
New Mexico Environment
Department
1190 St. Francis Drive
Santa Fe, New Mexico 87503

DATE: _____

settlemt.doc

ALTERNATIVE CLOSURE PLAN

**ALTERNATIVE CLOSURE PLAN FOR
ROSWELL COMPRESSOR STATION NO. 9
SURFACE IMPOUNDMENTS**

Prepared by:

**Transwestern Pipeline Company
Houston, Texas**

June 27, 1996

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LIST OF ACRONYMS AND ABBREVIATIONS

ACL	Alternative concentration limit
B&C	Brown and Caldwell
B&R	Brown & Root Environmental
bgs	Below ground surface
BLM	Bureau of Land Management
BTEX	Benzene, toluene, ethylbenzene, and xylenes
CES	Cypress Engineering Services
DBS&A	Daniel B. Stephens & Associates, Inc.
DO	Dissolved oxygen
DQOs	Data quality objectives
EDAC	Earth Data Analysis Center
EPA	Environmental Protection Agency
FID	Flame ionization detector
Halliburton	Halliburton NUS Environmental Corporation
HLA	Harding Lawson Associates
HRMB	Hazardous and Radioactive Materials Bureau (NMED)
mL	Milliliter
MS/MSD	Matrix spike/matrix spike duplicate
NMED	New Mexico Environment Department
NMSHTD	New Mexico State Highway and Transportation Department
OCD	Oil Conservation Division
OVA	Organic vapor analyzer
PARCC	Precision, accuracy, representativeness, completeness, and comparability
PID	Photoionization detector
QA	Quality assurance
QAPP	Quality assurance project plan
QC	Quality control
PPE	Personal protective equipment
PSH	Phase-separated hydrocarbons
PVC	Polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RPD	Relative percent difference
SCT	Salinity-conductivity-temperature meter
SEO	State Engineer Office
SVE	Soil vapor extraction
TCLP	Toxicity characteristic leaching procedure
TDS	Total dissolved solids
TNRCC	Texas Natural Resources Conservation Commission
TPH	Total petroleum hydrocarbons
Transwestern	Transwestern Pipeline Company
USGS	United States Geological Survey
VOCs	Volatile organic compounds

1. CLOSURE PLAN OBJECTIVES AND ORGANIZATION

The overall objective of this plan is to provide the basis for performing final closure of the former surface impoundments at the Transwestern Pipeline Company (Transwestern) Roswell, New Mexico, Compressor Station No. 9. Transwestern intends to close the former impoundments in such a manner whereby any hazardous constituents that may be present are removed to the extent that future threats to human health and the environment attributable to the facility no longer exist.

A phased approach has been and will continue to be used to achieve the closure objectives. In general, the objective of Phase I, which was completed in August, 1995, was to characterize the nature of affected soil immediately beneath the former impoundments. Phase II of investigation will be conducted to evaluate two additional potential source areas and to further assess the lateral and vertical extent of affected soil and ground water. Subsequent phases will be required to complete assessment activities and will address corrective actions that may be required to meet soil and ground water cleanup criteria. Scopes of work for phases not yet complete will be prepared and submitted to the NMED.

This alternative closure plan is organized in the following manner. The site background is described in Section 2 to provide a basis for the proposed closure activities. The results of all previous subsurface environmental investigations, including the Phase I assessment results, are summarized in Section 3. The proposed Phase II soil assessment and Phase II ground water assessment plans are outlined in Sections 4 and 5, respectively. A quality assurance project plan is included in Section 6 to ensure that the data generated are of sufficient quality to support subsequent decisions. Remediation objectives and a preliminary remediation strategy are included in Section 7. The anticipated project schedule and progress reporting requirements are included in Section 8.

2. SITE BACKGROUND

The Roswell compressor station is located approximately 9 miles north of the city center of Roswell, New Mexico along the east side of U.S. Highway 285 (Figure 1-1). Sections 2.1 through 2.5 provide background information regarding the facility layout and operation, history of the former surface impoundments that are the subject of closure under this plan, as well as the regional geographic, geologic, and hydrologic setting.

2.1 Facility Description

The Roswell compressor station is situated on approximately 80 acres of land in Sections 21 and 28, Chaves County, New Mexico (Figure 1-1). The property is privately owned by Transwestern Pipeline Company, while the remainder of Sections 21 and Section 28 are State Trust Land (Glenn, 1993). Site access is via U.S. Highway 285, and the entire property is secured by a chain link fence. The following is a list of pertinent information regarding the facility:

<i>Facility name</i>	Transwestern Pipeline Company Compressor Station No. 9
<i>Facility address</i>	Transwestern Pipeline Company 6381 North Main Street P.O. Box 1717 Roswell, New Mexico 88202-1717
<i>Telephone number</i>	(505) 625-8022
<i>EPA I.D. number</i>	NMD 986676955
<i>County and state</i>	Chaves County, New Mexico
<i>Property legal description</i>	SW¼ of the SW¼ of Section 21, T. 9S. R. 24E. NW¼ of the NW¼ of Section 28, T. 9S. R. 24E.
<i>Latitude/longitude of former impoundments</i>	Pit 1: N33°30'54" / W104°30'55" Pit 2: N33°30'55" / W104°30'55" Pit 3: N33°30'55" / W104°30'56"
<i>Site elevation</i>	Approximately 3610 feet above sea level

The Roswell compressor station is located along the Transwestern natural gas pipeline that extends from Texas to California. Natural gas is received from the east through two 24-inch pipelines, the West Texas Lateral and the Panhandle Lateral, and leaves to the northwest through two 30-inch pipelines. The primary function of the compressor station is to boost the pressure of the natural gas stream by means of compressors powered by natural gas internal combustion engines. The facility also includes the district offices for Transwestern's New Mexico operations, along with other ancillary buildings including a warehouse and a repair shop (Figure 2-1). The compressor station has been in operation at this location since August 9, 1960.

The only environmental permit currently in force is Discharge Plan GW-52 with the New Mexico Oil Conservation Division (OCD).

2.2 History and Operation of Former Surface Impoundments

The primary function of the former impoundments was to contain pipeline condensate, a mixture of hydrocarbon liquid and water that accumulates during the periodic cleaning of the natural gas pipelines. Natural gas is composed mostly of alkane compounds, with methane being the most abundant (Eiceman, 1986). In addition, natural gas contains variable concentrations of heavier molecular weight hydrocarbons (C4+), which may condense due to changes in temperature and pressure within the pipelines. Besides the higher molecular weight hydrocarbons derived from the natural gas itself, pipeline condensate may also contain lube oil blow-by derived from upstream gas compressors. The lube oil blow-by consists of crankcase lubricating oil that bypasses the compressor and enters the natural gas pipeline.

Pipeline condensate is periodically removed from the pipeline through "pigging" operations, which make use of a cylindrical piston-like device known as a "pig." The pig cleans the condensate from the interior pipeline wall by scraping and brushing as it is pushed through the pipeline by the pressurized gas stream. The pig and the accumulated liquid condensate are removed from the pipeline at the "pig receiver" (Figure 2-1). Currently, all condensate is collected and stored in aboveground tanks. The condensate is then sold for use as fuel. Formerly,

the condensate was stored in one or more unlined surface impoundments that are the subject of this closure plan. The impoundments have been variously referred to as the "disposal pit" or the "burn pits." The latter term refers to the reported practice of periodically burning the hydrocarbon liquids in the impoundment to reduce their volume (Campbell, 1993).

The first reported use of a surface impoundment at this location was in August of 1960, shortly following construction of the compressor station in 1960 (Campbell, 1993). However, no records are currently available showing the exact location or size of this surface impoundment or others that may have been used subsequently until the last remaining surface impoundment was backfilled in 1986. Correspondence among Transwestern, NMED, and OCD has generally referred to a single impoundment as "the disposal pit" (Campbell, 1992) or "the burn pit." However, the General Plan map for the Roswell compressor station (Transwestern, 1959) showed two surface impoundments located in the northeast corner of the facility, in the NE¼ of the SW¼ of the SW¼ of Section 21, T. 9S. R. 24E. The locations of the two former burn pits as previously shown on the General Plan were found to be incorrect, as discussed below.

A report prepared by Metric Corporation (1991) indicated the possibility that three pits had existed in the northeast corner of the facility. The three pits are designated in the Metric report (1991) as Pit 1 (southernmost), Pit 2 (northeast), and Pit 3 (northwest). For the sake of consistency, these designations will be retained through this closure plan. However, it should be noted that the existence of Pit 3 is less certain than Pits 1 and 2, as described below.

Prior to the preparation of this closure plan, the location and number of former surface impoundments was not known precisely. In order to clarify the number and exact locations of the former impoundments, DBS&A obtained historical aerial photographs showing the compressor station. The following sources were contacted during this effort: the Earth Data Analysis Center (EDAC, Albuquerque), the Bureau of Land Management (BLM, Albuquerque), the New Mexico State Highway and Transportation Department (NMSHTD, Santa Fe), IntraSearch (Denver), the Soil Conservation Service (SCS, Albuquerque), and the United States Geological Survey (USGS) Earth Science Information Center (Denver). Several aerial photographs showing the

compressor station were located, and contact prints were obtained for six different photographs taken on the following dates:

Date Flown	Approximate Scale	Source
07/28/61	1:23,000	EDAC-Albuquerque
10/10/72	1:25,000	NMSHTD-Santa Fe
06/21/73	1:32,000	BLM-Albuquerque
02/23/77	1:40,000	SCS-Albuquerque
04/19/81	1:26,000	BLM-Albuquerque
08/05/82	1:19,000	NMSHTD-Santa Fe

The 1961 aerial photograph shows a single feature that appears to be a surface impoundment in the extreme northeast corner of the property. This impoundment corresponds to Pit 2 on Figure 2-1. This appears to be the first surface impoundment constructed at the compressor station.

The 1972 and 1973 photographs reveal two features that appear to be surface impoundments. In order to more clearly see these features, enlargements were made of the 1973 and 1981 BLM photographs to scales of 1:5340 and 1:4330, respectively. Examination of the 1973 photograph shows two surface impoundments (Pit 1 and Pit 2 on Figure 2-1), with a third feature that may represent a backfilled impoundment (Pit 3 on Figure 2-1). However, the existence of Pit 3 is by no means certain, and it is quite possible that no impoundment ever existed at this location.

In the 1977, 1981, and 1982 photographs, only Pit 1 remains visible (Figure 2-1). Pit 2 appears to have been backfilled prior to the February 23, 1977, flight, and the feature labeled as Pit 3 is no longer visible.

Pit 1 was taken out of service no later than November 1983 and backfilled in June of 1986 (Virtue, 1995). No wastes of any type were received after the out of service date. This information is supported by examination of facility drawings and work order completion reports which indicate that considerable facility piping and AST upgrades and installations were made

during 1982 and 1983. Based on the aerial photographs, the dimensions and approximate periods of operation of the two confirmed former surface impoundments were as follows:

Impoundment	Approximate Dimensions	Date Constructed	Date Backfilled
Pit 1	40' x 70' (rectangular)	After 7/61, before 10/72	6/86
Pit 2	70' diameter (circular)	Before 7/61	Before 2/77

It is estimated that the impoundments were at most 10 feet deep. Therefore, the maximum volumes of Pits 1 and 2 during their operational lifetimes were approximately 1000 and 1400 cubic yards, respectively.

In addition to the pipeline condensate, trace quantities of chlorinated solvent wastes were inadvertently released into the impoundments. Solvents were used at the facility primarily as degreasers to remove oily deposits on engine parts during maintenance of the compressor engines. The quantity of solvents and the exact type of solvents used is unknown as no records that might indicate the quantity or type of solvent materials purchased are known to exist for the site. However, based upon all information that is available, the solvent products which were used at the facility could not have generated a RCRA F-listed waste (Virtue, 1995).

2.3 Geographic Setting

The Roswell compressor station is located approximately 6 miles west of the Pecos River within the Pecos Valley drainage basin. The entire area west of the Pecos River is generally referred to as the west Pecos slope (Kelley, 1971), which rises westward from elevations of about 3,300 feet at the Pecos River to over 10,000 feet in the Capitan Mountains some 50 miles to the west. Tributary surface streams drain west to east toward the Pecos River. Local topography is generally of low relief. The mean annual precipitation as measured at the Roswell Municipal Airport for a 23-year period was 9.82 inches. The majority of the precipitation occurs in July and

August during frequent summer thunderstorms.

2.4 Regional Hydrogeology

The Roswell compressor station lies within the northernmost portion of the Roswell hydrologic basin. The basin is structurally controlled by eastward-dipping carbonate and evaporite sequences of Permian age which were uplifted during the Tertiary period during the development of the Sacramento and Guadalupe Mountains along the western margin of the basin (Kelley, 1971). Eastward flowing tributaries originating in the western highlands have deposited Quaternary alluvium over the Permian age rocks west of the Pecos River.

Because the average dip of the Permian rocks is greater than the slope of the land surface, progressively younger units are encountered eastward toward the Pecos River. Several prominent northeast trending ridges and hills interrupt the gently sloping plains near the site. These structures are narrow fault zones referred to as the Border Hills, Six-Mile Hill, and the Y-O faulted anticlines.

The stratigraphic units of importance with regard to water resources are, in ascending order, the San Andres Formation (Permian), the Artesia Group (Permian), and the undifferentiated Quaternary valley fill alluvium. Figure 2-2 shows the generalized stratigraphy in the vicinity of the site. Ground water is produced from both a shallow water-table aquifer (alluvium) and a deeper artesian aquifer that includes the two bedrock units (Welder, 1983). The deep bedrock aquifer is commonly known as the Roswell artesian aquifer. According to the State Engineer Office (SEO), approximately 400,000 acre-feet of water are pumped annually from the two aquifers of the Roswell hydrologic basin (DBS&A, 1992). The two aquifers are separated by a semi-confining layer, but are connected where the carbonate aquifer rises structurally to meet the shallow aquifer. Both aquifers are recharged along surface exposures on the slopes to the west and are believed to discharge to the Pecos River at the eastern margin of the basin.

The following subsections describe each of the hydrostratigraphic units in the Roswell basin in

detail.

2.4.1 San Andres Formation

The San Andres Formation consists primarily of a thick sequence of limestones, dolomitic limestones, and dolomites, with increasing quantities of interbedded anhydrite and gypsum to the north (Kelley, 1971). The formation is divided into three members, in ascending order: the Rio Bonito, the Bonney Canyon, and the Fourmile Draw members (Figure 2-2; Kelley, 1971). The average thickness of the formation is about 1,000 feet in the Roswell basin (Bean, 1949).

The Fourmile Draw member is the principal water-bearing unit within the San Andres Formation. High permeability has resulted from an irregular network of collapsed breccias, cavities, caves, and other interconnected open structures which were formed by dissolution of evaporite and carbonate beds. Gypsum beds become much more abundant in the Fourmile Draw member from Roswell northward (Kelley, 1971), and a well-developed karst surface is exposed where the unit is not covered by alluvium. In the northern portion of the basin the water-bearing zones of the San Andres Formation are approximately 400 to 600 feet thick and ground water flow is primarily to the east-southeast toward the Pecos River.

In general, the lower boundary of the Roswell artesian aquifer, in general, is defined by low permeability zones that commonly occur within the Bonney Canyon member, which lies approximately 450 feet below the surface in the vicinity of the Roswell compressor station (Figure 2-2). SEO well records for wells near the site indicate that the upper boundary of the San Andres is approximately 92 feet below ground surface (bgs) in this area.

2.4.2 Artesia Group

The Artesia Group includes the following formations, in ascending order: the Grayburg, Queen, Seven Rivers, Yates, and Tansill Formations. In the vicinity of the Roswell compressor station, only the first three formations are present. The Artesia Group consists primarily of dolomite,

sandstone, and gypsum units of Permian age. The sedimentary sequence represents a rapid lateral change in depositional environments from the southern massive reef complexes near Carlsbad to the northern clastic and evaporitic sequences representative of back reef and shelf environments (Kelley, 1971).

The Grayburg Formation unconformably overlies the San Andres Formation and ranges in thickness from 140 to 360 feet. The bottom of the Grayburg Formation provides a leaky confining bed that allows artesian ground water to move upward through the Artesia Group into the shallow alluvial aquifer. The thickness of this confining bed varies from 0 to 1,000 feet across the basin.

Drillers' logs in the Roswell area indicate that discontinuous permeable units in the upper Artesia Group act as water-bearing zones (Welder, 1983). Fractures and cracks between fragments of collapsed breccia and solution-enlarged bedding planes and joints constitute the principal sources of permeability. These water-bearing zones generally occur in the upper quarter of the confining unit and may yield water to wells that tap both the upper Artesia Group and the shallow alluvium.

In most areas the Artesia Group is covered by a veneer of Quaternary alluvium west of the Pecos River. In the northwest portion of the basin, the bedrock confining unit is thin or absent, and the clay beds within the valley fill act as the confining bed for the lower confined carbonate aquifer. Historically, the lower carbonate aquifer discharged upward into the alluvium, but within the past 50 years, the vertical gradient across the confining bed has reversed because of ground water pumping from the deep aquifer. This reversal has resulted in a downward gradient, causing ground water in the shallow aquifer to discharge to the deeper carbonate aquifer in some areas (DBS&A, 1992).

2.4.3 Quaternary Valley Fill

The Quaternary valley fill in the Roswell area was deposited by shifting streams flowing from

the west toward the Pecos River. The valley fill consists of poorly to moderately consolidated deposits of gravel, sand, and clay which mantle the underlying Permian rocks. The thickness of alluvial sediments varies considerably from one locality to another because of the irregular bedrock erosional surface upon which the alluvium was deposited. In some areas the alluvial fill is moderately well cemented.

The thickness of the shallow alluvial aquifer is shown on Figure 2-3 for the northern portion of the Roswell Basin. Lyford (1973) developed the thickness (isopach) map after examination of drill cuttings from 225 wells penetrating the valley fill. Lyford's map indicates that the alluvium near the site is generally less than 50 feet thick. In other areas, however, the thickness can exceed 250 feet thick where the alluvium fills depressions in the underlying bedrock surface. Recent SEO well records indicate that the alluvium near the site is approximately 70 feet thick (DBS&A, 1992).

Lyford (1973) described three distinct units in the valley fill of the Roswell Basin. These units were termed the quartzose, clay, and carbonate gravels. The quartzose unit consists of sandstone, quartzite, quartz, chert, and igneous and carbonate fragments with varying degrees of calcium carbonate cementation. The quartzose unit in the vicinity of the Pecos River consists primarily of medium to coarse, uncemented quartz grains (Welder, 1983). Silt and clay deposits occur as lenses overlying the quartzose unit. These lenses were deposited in small ponds and lakes that resulted from the dissolution and collapse of the underlying carbonate rocks. The carbonate-gravel unit overlies the other valley fill deposits and generally consists of coarse carbonate gravel with intermixed silts and caliche.

The alluvial sediments underlying the compressor station, as observed in borings drilled during several investigations (Section 3), consist predominantly of interbedded cobbles, gravel, sand, silt, and clay. The finer-grained zones form lenticular beds which appear to be discontinuous across the site. Some of the alluvial deposits are firmly cemented in some places. These lithologic descriptions are consistent with Lyford's descriptions of the valley fill.

The principal water-bearing zones of sands and gravels are separated by less permeable lenses of silt and clay. According to Welder (1983), one to five water-bearing zones exist within the valley fill, and in many areas the alluvium is hydraulically connected to the upper bedrock units of the Artesia Group. The perimeter of the shallow alluvial aquifer is generally bounded by a margin of less permeable alluvium.

Figure 2-4 shows the approximate elevation of the water table in the shallow alluvium, as determined from measurements of water levels in wells completed in the alluvium (DBS&A, 1992). The map indicates that the station lies slightly outside the mapped extent of the shallow alluvial aquifer and that ground water flow is toward the Pecos River. Although a thin layer of saturated alluvium exists as far north as Arroyo del Macho, Welder (1983) did not include this area within the extent of the shallow alluvial aquifer as defined by him, primarily because the ground water quality in this area is too poor to be used for water supply purposes (DBS&A, 1992). The poor water quality in the shallow alluvial aquifer from slightly south of the Roswell compressor station northward is due to the presence of gypsum beds of the Fourmile Draw member at the base of the alluvium.

Because of the poor water quality and the low yields, most wells completed in the shallow alluvium are used primarily as livestock water supplies. In general, the chloride content of water in the shallow aquifer increases from west to east and ranges from 20 mg/L to 3700 mg/L (Welder, 1983). The presence of gypsum beds results in objectionably high calcium and sulfate concentrations in the shallow alluvial aquifer in the vicinity of the Roswell compressor station and northward. Sulfate concentrations are typically in the range of 2,000 to 3,000 mg/L, which is approximately equal to the equilibrium saturation concentration for ground water in direct contact with gypsum ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$). Thus, background sulfate concentrations in this area are four to five times above the New Mexico Water Quality Control Commission ground water standard for sulfate of 600 mg/L. The poor water quality in the alluvium is consistent with the high total dissolved solids concentrations reported for ground water from the on-site monitor wells, as discussed further in Section 3.

2.5 Water Well Inventory

A survey was conducted to locate water supply wells within 2 miles of the Roswell compressor station. This survey was accomplished by searching a water well database created by DBS&A that is based on the USGS Ground Water Sites Inventory database. The database contains the locations of all known water wells plus additional information regarding well construction, well use, and aquifer penetrated. The water well database was compiled by DBS&A for a ground water modeling project conducted for the SEO.

A review of the database revealed that there are 18 wells within about 2 miles of the compressor station. Table 2-1 details the location, total depth, depth to water, use, and completion aquifer for each of these 18 wells, along with their distance from the compressor station, and Figure 2-5 shows the locations of the wells relative to the site.

On December 2 and 3, 1994 a field reconnaissance of the off-site wells was conducted, and the wells were accurately located using a Magellan GPS satellite navigator. In addition, the condition and current use of each well was noted. The results of the well inventory and field reconnaissance are described below.

The closest off-site well to the former surface impoundments is a shallow livestock well completed in alluvium to a depth of 58 feet (well 3 on Figure 2-5). This well, which is no longer in use, is located about a half mile due east of the impoundments in the direction that would presumably be downgradient. The well is completed with 8⁵/₈-inch casing, and the depth to water measured in 1937 reportedly was 15 feet. The well is presently plugged and abandoned, and may have gone dry because of declining water levels in the Roswell area.

The next nearest well is a 352-foot-deep well (TW-1) located in the southwestern portion of the compressor station property (well 2 on Figure 2-5). This well was reportedly drilled in 1969 for use as a water supply well for the compressor station (Campbell, 1994). Following connection of

the facility to the City of Roswell water distribution system, however, use of the well was turned over to the Pecos Valley Artesian Conservancy District for monitoring water levels in the Roswell bedrock aquifer. Based on comparison of the drillers' log with the local stratigraphy, the well is completed in limestone of the San Andres Formation. The well is cased with 9⁵/₈-inch steel casing from the surface to a depth of 240 feet, and is open from 240 feet to the total depth of 352 feet. The depth to water as measured in December 1994 was 65 feet.

Several active and inactive irrigation and livestock wells are located between 1 and 2 miles east of the site (Figure 2-5). All of these wells are completed in the San Andres limestone aquifer. Given the distance to the downgradient wells and the presence of the aquitard between the alluvium and the bedrock aquifer, it is very unlikely that ground water from the compressor station could impact any of the active water supply wells.

3. PREVIOUS ENVIRONMENTAL INVESTIGATIONS

Several hydrogeologic investigations have been completed at the Roswell compressor station to characterize the extent of subsurface impacts near the former surface impoundments. The investigations have included:

- (1) a comprehensive soil vapor survey and soil coring program by HLA [1990],
- (2) a drilling and soil sampling program by Metric Corporation [1991],
- (3) installation of a monitor well by Halliburton NUS Environmental Corporation (Halliburton) [07/92],
- (4) installation of a hydrocarbon liquid recovery pump in monitor well MW-1 by Cypress Engineering Services (CES) [05/93],
- (5) a drilling and soil sampling program by Brown & Root Environmental (B&R) [06/93],
- (6) installation of an upgradient monitor well and sampling of the two nearest regional aquifer wells by Daniel B. Stephens & Associates (DBS&A) [12/94], and
- (7) the completion of the "Phase I Soil and Ground Water Assessment" program which included the characterization of affected soil immediately beneath two former surface impoundments and the installation of three downgradient monitor wells by DBS&A [08/95].

The above listed investigations and the interim corrective action program have been undertaken in phases beginning in the spring of 1990 and continuing to the present. During this period extensive data have been collected regarding subsurface soils and ground water conditions at the site.

Sections 3.1 through 3.7 provide an accounting of each of the field investigations conducted to date, and Section 3.8 summarizes the extent of subsurface impacts resulting from past surface impoundment operations. Table 3-1 provides a summary of the soil borings and monitor wells installed during each investigation. Analytical summaries of hydrocarbon compounds detected in soil and ground water are provided in Tables 3-2 through 3-8.

3.1 Harding Lawson Associates Shallow Subsurface Investigation (1990)

During the spring of 1990, a soil investigation was performed by HLA to investigate the presence of VOCs in the shallow subsurface in the vicinity of the former surface impoundments (HLA, 1991a). The HLA investigation included an extensive soil gas survey and a soil coring and sampling program.

During the soil gas survey, HLA collected a total of 812 soil vapor samples from the locations shown on Figure 3-1. Soil gas samples were collected from depths ranging from 2 feet to 36 feet by driving a soil vapor probe several feet ahead of the hollow-stem auger bit. Soil vapor samples were analyzed in a mobile laboratory by subcontractor Fahrenthold & Associates using a gas chromatograph equipped with an electron capture detector. Five target purgeable halocarbons were quantified, including 1,1,1-TCA, trichloroethene, perchloroethene, chloroform, and carbon tetrachloride.

The highest VOC concentrations were measured near the surface impoundments located in the northeast portion of the facility. The most frequently detected compound was 1,1,1-TCA, which was also detected at the highest concentrations (up to 372 ppmv). The areal distribution of 1,1,1-TCA at the 10-foot depth, as determined by HLA, is illustrated in Figure 3-2. The mass of vapor phase 1,1,1-TCA within the plume is estimated to be approximately 18 kg, assuming that the concentrations at the 10 foot depth apply to all soils from the surface to the water table at a depth of about 60 feet. This is equivalent to a volume of liquid 1,1,1-TCA of only about 3.5 gallons.

Following completion of the soil gas survey, HLA undertook a program of continuous coring and soil sampling in order to validate the soil vapor survey results. A total of 11 borings were drilled to depths of up to 65 feet. Continuous 5-foot-long soil cores were collected using a hollow-stem auger drill rig. Figure 3-3 shows the location of each boring drilled by HLA. The soil samples were analyzed in the laboratory for a suite of selected VOCs, semivolatile organic compounds,

total petroleum hydrocarbons (TPH), and toxicity characteristic leaching procedure (TCLP) metals. The results of these analyses are summarized in Tables 3-2 and 3-3.

Only a few of the HLA soil samples contained detectable concentrations of the target purgeable halocarbons. A soil sample collected from 35 to 37 feet deep in boring SB-9-07 near the surface impoundments contained the highest concentration of 1,1,1-TCA (2 mg/kg). This boring also contained somewhat higher concentrations of Freon-113, ethylbenzene, xylenes, and TPH.

In 4 of the 11 borings, HLA encountered perched water on top of a clay lens at approximately 30 feet bgs. The boreholes that contained water were near the utility garage and engine room (Figure 2-1). HLA postulated that the clay formed an aquitard with an undulating surface, thus allowing the water to pond within depressions in the upper surface of the clay.

3.2 Metric Corporation Shallow Subsurface Investigation (1991)

During July and November 1991, Metric Corporation drilled 20 additional soil borings to delineate the areal and vertical extent of the VOCs identified by HLA near the surface impoundments (Metric, 1991). The locations of borings drilled by Metric are shown on Figure 3-4. Soil borings were generally advanced to approximately 30 to 40 feet bgs in order to characterize soil type and to determine if VOCs were present above the uppermost clay unit. Only four soil borings were drilled to depths greater than 50 feet bgs (Table 3-1).

Metric collected soil samples using a continuous tube sampler, and each core was screened for the presence of VOCs using an organic vapor analyzer (OVA). Within a given soil core, the material with the highest concentration of organic vapors was submitted to the laboratory for analysis of the following constituents: TPH, benzene, toluene, ethylbenzene, and xylenes (BTEX); and purgeable halocarbons by EPA Methods 418.1, 8010, and 8020, respectively. The results of these laboratory analyses are summarized in Tables 3-2 and 3-4. Several of the borings contained VOC concentrations above the soil cleanup guidelines enforced by NMOCD.

Based on the analytical results, Metric estimated that the areal and vertical extent of VOC impacts extended approximately 240 feet east and approximately 100 feet north of the northeast property corner. The investigation further established that purgeable halocarbons are present to depths of at least 30 feet bgs near surface impoundments 1 and 2 (soil borings "Pit 1" and "Pit 2") and along the eastern fence line (soil boring SG86). In addition, some soil samples contained TPH concentrations of 100 mg/kg, or greater, to depths exceeding 27 feet in soil borings "Pit 1," "Pit 2," SG86, and OS BH-9.

Most borings drilled previously by HLA and Metric had penetrated a clay layer at approximately 30 feet bgs. However, clay was not encountered in soil boring "Pit 2" above about 68 feet bgs. This prompted Metric to conclude that a natural clay basin existed beneath the surface impoundments, with the sides sloping from the 30 to 40 foot depth around the perimeter, to approximately 70 feet bgs near the basin bottom.

However, subsequent drilling programs verified that the upper clay is, in fact, present at the 35 to 40 foot depth near the "Pit 2" soil boring, but is thinner and contains coarser sediments. The upper clay unit appears to grade laterally into a coarser zone of sandy clays near soil boring "Pit 2." Further, the clay unit identified at 67.9 feet bgs by Metric is actually part of the lower clay unit that underlies the entire site. This lower clay may lie near the contact between the valley-fill alluvium and the underlying Artesia Group Permian bedrock units (see Figure 2-2, Section 2.5).

Ground water was encountered at depths ranging from 37 to 57 feet bgs in 6 of the 20 borings drilled by Metric. Soil borings "Pit 2" and SG361 (Figure 3-4) contained thin perched water zones (1 to 6 feet thick) above fine-grained sandy clays which correspond to the upper clay unit. Approximately 1-foot of water was measured at the bottom of soil borings OS BH-8 and OS BH-9 (Figure 3-4) at approximately 49 feet bgs. The water measured at the 49-foot depth may have migrated down the boreholes from the top of the upper clay unit. Finally, the ground water encountered at depths of about 55 feet bgs likely represents the water table of the uppermost aquifer, as these depths to water were generally reported in borings drilled to depths of

approximately 70 feet bgs.

3.3 Halliburton NUS Corporation Monitor Well Installation (1992)

During July 1992, Halliburton installed one monitor well within the natural clay basin determined by Metric (Section 3.2) (Halliburton, 1992). The boring was drilled to a depth of 60 feet prior to sampling, at which point continuous samples were collected with a split-spoon sampler until a red clay layer containing very hard sulfate lenses was encountered at 68 feet bgs. Monitor well MW-1 was installed at the location depicted on Figure 3-5.

Following installation of MW-1, the well was developed by bailing and subsequently sampled for 8240 volatile and 8270 semivolatile organics, TPH, and total metals. The analytical results indicated that the ground water within monitor well MW-1 contained aromatic and halogenated hydrocarbons, as well as several semivolatile organic compounds. These results are summarized in Table 3-4.

3.4 Brown & Root Environmental Ground Water Assessment (1993)

In April 1993, B&R, a division of Halliburton, completed a limited assessment of ground water impacts resulting from disposal activities at the former surface impoundments (B&R, 1993). The investigation was undertaken to determine if two separate saturated zones existed within the alluvium and to establish ground water quality beneath the former impoundments.

As part of their investigation, seven soil borings were drilled, and four of these were completed as monitor wells. Figure 3-5 shows the locations of soil borings and monitor wells installed by B&R. Soil samples were collected from each boring using a split-spoon sampler or continuous core barrel. The samples were screened for the presence of VOCs using an OVA. Unfortunately, the OVA was not functioning during the drilling of soil borings SB-4, SB-5, and SB-1C. Soil samples were collected above the two saturated zones and analyzed for TPH using EPA Method 418.1; the results are summarized in Table 3-4.

Perched water was not encountered above the upper clay unit during drilling of soil borings SB-1B, SB-2, SB-3, and SB-5 (Figure 3-5). However, phase-separated hydrocarbons (PSH) and water were encountered in soil boring SB-1A immediately above the upper clay layer at approximately 40 feet bgs. This boring was subsequently plugged and abandoned by B&R. Soil boring SB-4 encountered a small saturated zone in fractured limestone at approximately 47 feet bgs. This boring is located approximately 250 feet east of the property boundary, and the limestone probably corresponds to the top of the Artesia Group (Section 2.5).

B&R installed four monitor wells in the uppermost aquifer within soil borings SB-1B, SB-2, SB-3, and SB-5. The monitor wells, identified as MW-1B, MW-2, MW-3, and MW-5, were set at total depths ranging from 65 to 70 feet bgs (Table 3-1). The newly installed wells were then checked for the presence of PSH, developed, and sampled.

Approximately 4 feet of PSH was present on top of the water table in monitor wells MW-1B and MW-2. Ground water samples were collected from the two monitor wells without PSH (MW-3 and MW-5) and analyzed for TPH (EPA Method 418.1), volatile organics (EPA Method 624 and 8240), and total dissolved solids (EPA Method 160.1). The results of these analyses are summarized in Tables 3-4 and 3-5.

B&R concluded that two water bearing zones were present in the alluvium and that both were impacted by VOCs. The two zones included (1) the upper thin zone of perched water on the upper clay unit (approximately 40 feet bgs) and (2) a deeper zone of saturated silty sand and sand at depths ranging from 55 to 65 feet bgs. During the drilling of soil borings SB-1B and SB-2, B&R identified zones of residual saturation and PSH above the upper clay unit. Following construction of monitor wells MW-1B and MW-2 in the uppermost aquifer, approximately 4 feet of PSH was measured in each well.

In June 1993 B&R returned to the site to install PSH recovery wells in the upper water-bearing zone above the upper clay unit. An additional seven borings were drilled near the surface

impoundments, designated RB-1 through RB-7 (Figure 3-5). Only one of the seven additional borings contained perched liquids. The one boring which contained liquid (RB-7) was completed as recovery well RW-1 near monitor well MW-1 (Figure 3-5). Approximately 1.4 feet of PSH was measured in recovery well RW-1 following its construction.

On March 23, 1994, CES removed an inoperative recovery pump from MW-1 and collected ground water samples from monitor wells MW-3 and MW-5. On April 15, 1994, B&R installed a pneumatic product recovery pump and skimmer in monitor well MW-1. At that time B&R measured the following depths to PSH and to ground water in the four wells containing free hydrocarbon product:

Well	Date	Total Depth of Well (feet)	Depth to PSH ¹ (feet)	Depth to Water ¹ (feet)	PSH Thickness (feet)
MW-1	04-15-94	68.0	53.30	61.54	8.24
MW-1B	04-15-94	65.5	58.42	61.30	2.88
MW-2	04-15-94	65.0	58.68	61.50	2.82
RW-1 ²	04-15-94	42.5	38.70	39.00	0.30

¹ Depth in feet below top of casing.

² Recovery well RW-1 is completed in the perched water zone.

3.5 Interim PSH Removal Program

On May 21, 1993, a recovery pump was installed in MW-1 by CES. During July, 1993, B&R installed PSH recovery pumps in monitor wells MW-1B, MW-2, and RW-1. Since that time, PSH and water have been pumped from these wells and routed to an aboveground storage tank. Rollins Environmental Services then periodically transports the nonhazardous waste hydrocarbon liquid to Deer Park, Texas for incineration.

During the fall of 1993, Brown and Caldwell (B&C) installed skimmers on each recovery pump to reduce the volume of water recovered. Prior to the installation of the skimmers, B&C

measured PSH levels and ground water levels of approximately 58.5 and 62 feet bgs in monitor wells MW-1B and MW-2, respectively. The depth to water was approximately 38.6 feet bgs in recovery well RW-1, which contained approximately 0.06 feet of PSH at the time of measurement.

The most recent measurements of PSH levels and ground water levels were obtained in May, 1996. These measurements are summarized below:

Well	Date	Total Depth of Well (feet)	Depth to PSH ¹ (feet)	Depth to Water ¹ (feet)	PSH Thickness (feet)
MW-1	05-31-96	68.0	no PSH	63.75	0
MW-1B	05-31-96	65.5	59.03	59.10	0.07
MW-2	05-31-96	65.0	no PSH	59.15	0
RW-1 ²	05-31-96	42.5	39.20	39.25	0.05

¹ Depth in feet below top of casing.

² Recovery well RW-1 is completed in the perched water zone.

3.6 Daniel B. Stephens & Associates, Inc. Subsurface Investigation (1994)

Following correspondence and discussions between NMED and Transwestern, DBS&A performed a limited field investigation during November and December 1994. Upgradient monitor well MW-6 was installed approximately 500 feet southwest of the location of the former surface impoundments (Figure 2-1). The MW-6 boring was drilled using a hollow-stem auger to a depth of 80 feet, and the well is screened from 60 to 75 feet bgs. Soil samples were collected at 5-foot intervals during drilling, and field headspace measurements using a PID did not detect the presence of VOCs in any of the soil samples.

The alluvial sediments penetrated during drilling of MW-6 were generally consistent with those observed in previous borings; that is, they consisted predominantly of sandy gravel and sand from the surface to a depth of 60 feet and silty clay and clayey sand from 60 to 75 feet. A

gravelly sand of unknown thickness was penetrated at the 79-foot depth in this boring; however, the red plastic clay reported in previous borings was not encountered.

A ground water sample from MW-6 and a soil sample from the same boring collected from a depth corresponding to the water table were submitted for laboratory analysis of VOCs and TPH. Both the soil and the ground water sample exhibited no detectable concentrations of 8010/8020 VOCs or TPH determined by method 418.1.

In order to allow a better estimate of the ground water flow direction and gradient within the shallow alluvium, the elevations and coordinates of all on-site monitor wells were resurveyed on December 1, 1994. The well locations and elevations based on this survey are provided in Table 3-9.

Depths to water were measured in on-site monitor wells MW-3, MW-5, and MW-6 on December 4, 1994 and again on December 22, 1994. Ground water flow directions calculated for the two dates of measurement are approximately N34E and N32E, respectively, indicating that ground water in the shallow alluvium flows to the north-northeast in the vicinity of the former impoundments. Depths to water were again measured in on-site monitor wells MW-3, MW-5, and MW-6 and in off-site monitor wells MW-7, MW-8, and MW-9 on September 15, 1995. The flow direction from these most recent measurements is shown graphically on Figure 3-9. The dimensionless ground water gradient calculated using the September 15, 1995, data is 0.015.

In addition to the sampling and analysis of MW-6, ground water samples were also collected from on-site deep well TW-1 (Figure 2-1) and off-site deep well #5 (Figure 2-5). Well #5 was selected as representative of background upgradient water quality within the San Andres bedrock aquifer. The ground water samples from these two wells were analyzed for a modified Appendix IX suite of constituents.

These results indicate that both deep wells yield very hard ground water of relatively high salinity. Well #5 contains high concentrations of sulfate (768 mg/L), chloride (750 mg/L), and

TDS (2420 mg/L). These values significantly exceed the New Mexico ground water standards for sulfate (600 mg/L), chloride (250 mg/L), and TDS (1000 mg/L). The ground water sample collected from Transwestern well TW-1, although of somewhat lower salinity, still exceeds the New Mexico standards for chloride and TDS, with reported concentrations of 631 mg/L and 1290 mg/L, respectively. In addition, deep well TW-1 also contained elevated concentrations of iron (4.22 mg/L) and manganese (0.39 mg/L), which exceed the New Mexico ground water standards for these elements of 1.0 mg/L and 0.2 mg/L, respectively.

The high salinity of the ground water from TW-1 and Well #5 is almost certainly natural and probably results from dissolution of soluble evaporite minerals within the upper Fourmile Draw Member of the San Andres Formation, as discussed in Section 2.4. The high salinity of the ground water in the bedrock aquifer in this vicinity may also account for the fact that many of the production wells are no longer in use.

Appendix IX VOC analyses of the ground water samples collected from the two deep wells revealed no detectable concentrations of any of these compounds. In addition, the sample from TW-1 was analyzed for Appendix IX SVOCs, and the only compound detected was bis(2-ethylhexyl)phthalate (18 mg/L). The phthalate esters are well-known laboratory contaminants used as plasticizers in most flexible plastic products, such as the plastic beakers and tubing used in many laboratory applications. EPA has acknowledged this compound as a common laboratory contaminant (EPA 1988, 1991). Therefore, the reported detection of this compound is probably the result of laboratory handling of the sample; it is almost certainly not present in the ground water, as no other organic compounds were detected in the sample.

3.7 Daniel B. Stephens & Associates, Inc. Subsurface Investigation (1995)

In August, 1995, Daniel B. Stephens & Associates (DBS&A) completed a "Phase I" soil and ground water assessment program. The primary objectives of this program were to characterize affected soil immediately beneath the two confirmed former surface impoundments, Pit 1 and Pit 2, and to characterize affected ground water downgradient of the former impoundments. During

the course of this program, eight soil borings were drilled, monitor wells were installed in three of the borings, hydraulic tests were conducted, fluid levels were measured, and samples were collected for laboratory analysis.

Since the location of Pits 1 and 2 are known with relative certainty from examination of aerial photographs, two soil borings were drilled within each of these two areas at the locations shown on Figure 3-6. The most highly affected soil was selected from each boring for laboratory analysis. These samples were selected based on visual examination and field headspace screening with a PID. Native soils were encountered at approximately 12 to 14 feet below ground surface within the former surface impoundments. In general, this depth also corresponded with the depth of the most highly affected soils for which soil samples were collected for analysis.

The Pit 1 and Pit 2 area soil samples were analyzed by Core Laboratories for TPH, VOCs, SVOCs, PCBs, metals, cyanide, and sulfide. A summary of detected compounds is presented in Table 3-6. As indicated, the soil samples from immediately beneath the former surface impoundments contain primarily petroleum hydrocarbons and small quantities of VOCs and SVOCs. TPH concentrations ranged from less than 50 mg/kg up to 26,000 mg/kg. Based on proposed soil screening levels (U.S. EPA, 1994), the primary organic compounds at issue are benzene, toluene, 1,1-DCE, PCE, and 1,1,1-TCA. In addition, EPA Region III has developed toxicological and risk-based concentrations for soil ingestion (U.S. EPA, 1995), of which none of the Pit 1 and Pit 2 soil samples exceed the concentration for VOCs, SVOCs, PCBs, or metals (Table 3-6).

During the off-site portion of the investigation, DBS&A collected 13 additional soil samples for analyses from four soil borings which were drilled at locations in the downgradient direction from the former impoundments (Figure 3-6). Core Laboratories analyzed off-site soil samples for VOCs, and a selected list of metals in order to establish background metal concentrations in soil. Background metal concentrations were desired for comparison with metal concentrations within the former impoundments. A summary of detected compounds and metal concentrations is presented in Table 3-7. VOC concentrations were below the detection limit for each soil sample

with the exception of methylene chloride, which was also present in the laboratory method blank.

Ground water monitor wells were installed in three of the four off-site soil borings (Figure 3-6). A monitor well was not installed in the northernmost soil boring (labeled MW-7ABD on Figure 3-6) because ground water was not encountered at this location at the depth of the uppermost aquifer.

Ground water samples were collected from the three new downgradient monitor wells (MW-7, MW-8, & MW-9) and from three existing monitor wells (MW-3, MW-5, & MW-6). Samples were analyzed by Core Laboratories for VOCs, SVOCs, organochlorine pesticides/PCBs, metals, cyanide, sulfide, and major ions. A summary of detected constituents is presented in Table 3-8. The only detected organic compounds were benzene at 6 µg/L in monitor well MW-8 and methyl ethyl ketone and methyl methacrylate at 900 and 5 µg/L, respectively, in monitor well MW-7. The inorganic chemical analyses indicate that ground water samples from each well, including upgradient monitor well MW-6, exceed the NMWQCC ground water standards for total dissolved solids, chloride, and sulfate. The generally poor water quality of the uppermost aquifer in the vicinity of the site is natural and is likely due primarily to the presence of gypsum beds within the alluvium and underlying Artesia Group.

During well development, DBS&A conducted bail-recovery tests on newly installed wells MW-7, MW-8, and MW-9 and redeveloped wells MW-3 and MW-5. The five tests were conducted to obtain preliminary estimates of the in-situ hydraulic conductivity of the uppermost aquifer. The estimated values for hydraulic conductivity ranged from 0.03 to 0.85 ft/day with a geometric mean of 0.1 ft/day.

3.8 Extent of Soil and Ground Water Contamination

The investigations completed to date and described in Sections 3.1 through 3.7 have been conducted to characterize the subsurface hydrogeology and the distribution of VOCs in the soils

and ground water beneath the former surface impoundments. Figure 3-7 shows the locations of all borings and monitor wells installed to date. The contaminants detected consist primarily of petroleum hydrocarbons that are typical components of pipeline condensate, which was formerly held in the surface impoundments. Tables 3-2 through 3-8 provide summaries of the organic and inorganic constituents detected in soils and ground water during each of the previous investigations.

Sections 3.8.1 through 3.8.3 summarize the findings of the investigations discussed above.

3.8.1 Site Hydrogeology

The Quaternary sediments beneath the impoundments consist of interbedded cobbles, gravel, sand, silt, and clay to depths of approximately 70 feet bgs. The lithology of the alluvium is consistent with the descriptions provided by Lyford (1973). A generalized hydrogeologic cross section of the sediments underlying the impoundments constructed along a north-south line (Figure 3-7) is provided in Figure 3-8. Soil types in Figure 3-8 are defined using the Unified Soil Classification System. The hydrogeology underlying the site is as follows:

- From the ground surface to depths of approximately 30 to 35 feet bgs, brown gravelly sands and clays are present. Perched water is often encountered within the bottom few feet of this interval.
- At depths of approximately 35 to 60 feet, light brown to reddish-colored interbedded silts, sands, and clays are encountered. The fine-grained clay lenses serve as perching layers for the downward moving fluids and likely represent interfingering deposits of limited lateral extent.
- At depths of approximately 60 to 70 feet, saturated silty sands and sands are present. This zone is referred to as the uppermost aquifer.

- At approximately 70 feet, a red plastic clay of unknown thickness is present. This unit probably represents the transition from the Quaternary alluvium to the Permian-age bedrock of the Artesia Group.
- As discussed in Section 2.5, the background water quality in the shallow alluvial aquifer is very poor in the vicinity of the site due to the presence of gypsum beds beneath the alluvium. TDS concentrations exceed 3000 mg/L in on-site monitor wells MW-3 and MW-5 (Table 3-5). These two wells do not appear to be impacted by site activities; rather, the elevated TDS concentrations in these wells simply reflect the poor background quality of ground water in the region.
- The ground water flow direction in the alluvium underlying the former impoundments is north-northeast, and the dimensionless head gradient is approximately 0.015.

3.8.2 Soil Impacts

Based on field OVA measurements and analytical chemistry results, elevated VOC concentrations in soil appear to encompass an area of approximately 600 feet by 400 feet centered between the two former surface impoundments. Figure 3-10 shows the estimated areal extent of impacted soil, in excess of 100 mg/kg TPH.

Near the former surface impoundments, the vertical extent of impacted soils extends from approximately land surface to the uppermost aquifer at approximately 60 feet. The vertical extent of impacted soil decreases as one moves laterally away from the surface impoundments. Due to local soil heterogeneities, it appears that VOCs have spread out along preferential pathways on top of the clay lenses at the 30- to 40-foot depth, prior to continued downward migration to the uppermost aquifer.

A generalized cross-sectional profile of impacted soils is shown in Figure 3-11; Figure 3-7 shows the location of the cross section. The estimated distribution of impacted soils is based both on

field organic vapor analyzer readings and soil TPH concentrations as determined in the laboratory.

The extent of 1,1,1,-TCA detected in soil samples is limited to the area immediately below the former surface impoundments.

3.8.3 Ground Water Impacts

The estimated extent of actionable VOCs in ground water is difficult to ascertain due to the limited number of existing monitor wells. However, the lateral extent of VOCs appears to be bounded on-site by monitor wells MW-3, MW-5, and MW-6. The ground water plume most likely extends downgradient beyond the estimated extent of actionable soil contamination. However, the downgradient extent appears to be very limited as indicated by ground water samples collected from MW-7, MW-8, and MW-9. A summary of the analytical results from water sampling events can be found in Tables 3-4, 3-5, & 3-8.

The following VOCs have been detected in monitor well MW-2: benzene (6500 ppb), toluene (15000 ppb), ethyl-benzene (2100 ppb), and total xylene (13000 ppb). However, it is important to note that this monitor well also contained phase separated hydrocarbon at the time the sample was collected and therefore the results for this sample most likely overstate the actual concentration of BTEX constituents in affected ground water. Ground water analysis results from MW-1 detected the following organic constituents: benzene (370 ppb), toluene (61 ppb), ethyl-benzene (110 ppb), o-xylene (120 ppb), p-m xylene (820 ppb), 1,1,1, TCA (180 ppb), 1,1, DCA (560 ppb), 2-butanone (MEK) (220 ppb), naphthalene (34 ppb), 2-methyl-naphthalene (51 ppb), and 4-methyl-phenol (250 ppb), and petroleum hydrocarbons (37 ppm).

PSH is present in on-site monitor wells MW-1, MW-2, and MW-1B completed in the uppermost aquifer at 55 to 70 feet bgs, and in recovery well RW-1, completed in the limited perched zone from 35 to 42 feet bgs. The extent of PSH off-site, if any, remains to be fully defined.

4. SOIL ASSESSMENT PLAN

A phased approach has been and will continue to be used to assess the nature and extent of soil contamination resulting from past usage of the former surface impoundments.

4.1 Phase I Characterization of Affected Soil

Contaminant source area characterization, Phase I, was completed during the August 1995 assessment activities and consisted of precisely locating the former impoundments identified as Pit 1 and Pit 2 and characterizing affected soil through laboratory analyses. A Phase I Soil and Ground Water Assessment Report (DBS&A, 1995) was subsequently prepared and submitted to the NMED. Constituents identified from the contaminant source area characterization have been used to develop a soil and ground water sample analysis plan for the Phase II assessment activities.

4.2 Phase II Characterization of Affected Soil

A Phase II Soil and Ground Water Assessment Plan (DBS&A, 1995) was prepared and submitted to the NMED in December, 1995. The primary objective of this plan, as it relates to the characterization of affected soil, is to characterize potentially affected soil beneath the location of a suspected former impoundment identified as Pit 3 and potentially affected soil located near the previous soil boring location SG86. A second objective is to more closely define the lateral extent of affected soil in the vicinity of the former surface impoundment identified as Pit 1. A third objective is to evaluate the effectiveness of soil vapor extraction (SVE) as a potential remediation method for affected soil.

4.2.1 Characterization of Affected Soil at the Pit 3 and SG86 Locations

The soil sampling rationale for the Pit 3 and SG86 areas differs from that completed for Pit 1 and

Pit 2 because the former locations of Pit 1 and Pit 2 (Figure 2-1) are known with relative certainty from examination of aerial photographs. The location of Pit 3, if indeed it ever existed, is not known with any degree of certainty. Likewise, the location of a possible hydrocarbon source area in the vicinity of Metric Corporation boring SG86 is not known (Figure 3-4). Therefore, in order to determine whether affected soil exists at these two suspect areas, an exploratory soil sampling program will be undertaken at these locations.

The approach will be to begin by collecting a continuous soil core at the center of each suspected location (Figure 4-1) to a maximum depth of 30 feet bgs. If hydrocarbon-impacted soils are not found by screening methods, up to four additional soil borings will then be drilled at 50-foot centers on a grid centered at the initial soil boring location, as shown in Figure 4-1. Subsequent to collection of soil samples, each boring will then be plugged as described in Section 4.4, to prevent any potential downward migration of fluids.

The presence of any hydrocarbon affected soil at these sites is expected to be obvious, based upon visual examination of soil cores and field headspace screening of soil samples using a PID. If hydrocarbon affected soil is present at the Pit 3 and SG86 locations, a single soil sample from the most highly affected boring at each of the two potential source locations will be selected for characterization. These soil samples will be analyzed for TPH, VOCs, SVOCs, PCBs, metals, cyanide, and sulfide as described in the Phase II plan (DBS&A, 1995). If no evidence of affected soil is noted in any of the five borings at Pit 3 or SG86, as determined by field screening with the PID, a single soil sample from the center boring will be submitted for the aforementioned laboratory analyses. In addition, one sample from the remaining borings will be collected and submitted for analysis of VOCs and TPH. All borings, with the exception of a monitor well to be constructed near SG86, will be plugged and abandoned following sample collection.

4.2.2 Delineation of Affected Soil and Installation of SVE Wells in the Former Pit 1 Area

Three soil borings will be drilled at the perimeter of the former Pit 1 area as shown in Figure 4-1. The primary objective of these three borings is to delineate the lateral and vertical extent of

affected soil beneath and adjacent to the former Pit 1 area. A second objective is to establish a total of three soil vapor extraction (SVE) wells, one within each of the three soil borings, which could be used for completion of an SVE pilot test during the course of the Phase II assessment activities.

As the soil borings are advanced using hollow stem auger drilling techniques, split-spoon samples will be collected on 5-foot intervals to an approximate depth of 60 feet bgs. Samples will be described and analyzed for VOCs by field headspace methods using an organic vapor analyzer equipped with a PID.

At a minimum, a single sample of the most highly affected soils will be selected from each boring based on visual examination and PID readings. Soil samples collected for analysis will be contained in 250-mL glass jars or 6-inch brass liner rings and placed in an ice-filled cooler for shipment to a qualified laboratory for analysis. Samples will be analyzed for VOCs, PAHs, and TPH as described in the Phase II plan (DBS&A, 1995).

Upon reaching the total depth of each boring, an SVE well will be constructed in the borehole so that remedial design parameters can be evaluated. Wells SVE-1 and SVE-2 will consist of 30 feet of 2-inch diameter, 0.020-inch machine slotted PVC screen, Approximately 30 feet of flush-thread 2-inch PVC blank casing, and 32 feet of 12-20 silica sand filter pack. A bentonite seal will be emplaced on top of the filter pack, followed by cement-bentonite grout to the ground surface.

Well SVE-3 will be completed with two separate intervals. The SVE well cluster will be designated SVE-3A and SVE-3B for the shallow (screened from 10-30 feet bgs) and deep (screened from 40-60 feet bgs) zones, respectively. The annulus will be completed with 12-20 silica sand pack and a bentonite seal between the two screened zones. The upper bentonite seal will be followed by cement-bentonite grout to the ground surface.

4.3 Subsequent Phases of Soil Assessment

Subsequent phases of soil assessment are anticipated and will be completed in order to fully delineate the lateral and vertical extent of affected soil which may require corrective action. Prior to any additional assessment activity, Transwestern will develop and submit an assessment plan to the NMED for review and comment. Subsequent assessment plans will be similar in form and scope to the recently submitted Phase II assessment plan and, in general, will include:

- a clear statement of the objectives
- a description of the assessment strategy and methods to be employed
- a diagram indicating the locations of additional soil borings
- a sample collection and analysis plan
- a schedule for implementation and completion of the assessment activities.

The sample analysis plan for subsequent soil assessments will be determined based upon the results of prior assessments. In regard to organic constituents, the sample analysis plan for subsequent soil assessments will include all constituents previously detected and present at a significant concentration in Phase I and Phase II source area soil samples. For this purpose, a significant concentration will be defined as a detection above the soil performance standard included in Table 7-1. Constituents may be eliminated from the sample analysis plan if it can be reasonably shown that a constituent was included because of an isolated detection anomaly and/or a laboratory introduced contaminant.

In regard to metal constituents, the sample analysis plan for subsequent soil assessments will be based on statistical comparison of the observed concentrations of each element with its expected background concentration in soils, as reported in existing literature. Statistical techniques for determining whether a particular constituent is present above background levels will follow EPA guidance (EPA, 1989a, 1989b).

4.4 Soil Sampling Procedures

4.4.1 Soil Sampling Procedures During Phase II Source Area Assessment

During the Phase II soil assessment activities for characterization of potentially affected soil at the Pit 3 and SG86 locations, soil sampling will be performed by continuous drive sampling and hollow stem auger drilling techniques through the clean soil backfill (or native soil if not in a backfilled location) and into the underlying potentially impacted subsoil below. By retrieving successive continuous soil samples, the maximum stratigraphic information will be obtained from each boring, with a minimum of soil cuttings that require disposal being generated. Based on reasonable assumptions regarding the depths of the former impoundments, it is estimated that the depth to the most highly affected soil in these areas will be between 10 and 15 feet below grade.

Drive samples will be obtained using a 24-inch-long split-barrel sampler in accordance with DBS&A SOP 13.3.2 (Appendix D). The split-barrel sampler will be driven into the soil using the rig-mounted drive hammer with uniform drive-pressure/drop-height. Blow counts will be recorded for all split-barrel drives. Following retrieval from the borehole, the split-barrel sampler will be opened and the soil material described according to DBS&A SOP 13.3.2. A subsample of the material will be placed in a ziplock plastic bag for field headspace screening for VOCs using a PID.

4.4.2 Soil Sampling Procedures During Subsequent Assessment Activities

Soil sampling procedures employed during the remainder of the Phase II assessment activities and during subsequent assessment activities will be detailed within the assessment plan for those activities.

4.4.3 General Procedures for Sample Container Labeling and Shipping

All sample containers will be labeled using waterproof ink. Label information will include the sampling location, depth interval, sampling date and time, type of analysis requested, project number, and the initials of the sampler. The containers will be sealed and placed in clear plastic bags. The sealed containers will be put into coolers on bags of ice or frozen ice packs. Plastic bubble pack or other suitable packing material will be used to protect the samples during shipping. Chain-of-custody forms will be completed in triplicate for each sample shipment as described in Section 6.5.

Field personnel will ship the sample coolers to the laboratory using an overnight courier service. The fastest possible shipping method will be used, and all sample shipments will be carefully tracked to ensure that samples arrive intact and that all holding times are met.

4.5 Borehole Abandonment Procedures

All soil borings which are not completed as a ground water monitor well will be abandoned in accordance with DBS & A SOP 13.4.4, Well and Boring Abandonment (Appendix D).

4.6 Decontamination Procedures

All non-disposable field equipment that may potentially come in contact with any soil sample will be decontaminated in accordance with DBS&A SOP 13.5.2, Decontamination of Field Equipment (Appendix D), in order to minimize the potential for cross-contamination between sampling locations. Clean latex or plastic gloves will be worn during all decontamination operations. The following sequence of decontamination procedures will be followed prior to each sampling event:

1. Wash all down-hole equipment in a solution of non-phosphate detergent (Liquinox[®]) and distilled/deionized water. All surfaces that may come into direct contact with the soil

sample will be washed. Use a clean Nalgene[®] tub to contain the wash solution and a scrub brush to mechanically remove loose particles.

2. Rinse the equipment twice with distilled/deionized water.
3. Allow the equipment to air dry prior to the next use.

The drill rig and all down-hole equipment will be steam-cleaned and allowed to air dry between borings. A decontamination area lined with plastic sheeting will be set up to contain all wash water associated with the steam-cleaning operation. Liquid wastes produced during equipment decontamination will be contained in 55-gallon drums at a designated on-site drum storage area. Pending the results of laboratory analyses, all liquids will be handled as potentially hazardous wastes, as described in Section 4.7.

4.7 Management of Investigation-Derived Wastes

Only wastes determined to be characteristically hazardous will be managed as RCRA hazardous wastes.

Liquid wastes generated during decontamination of drilling and sampling equipment will be stored pending results of associated soil sample and equipment blank laboratory results. For example, the disposition of wash water associated with a particular boring will be determined from the analytical results of soil samples collected from that particular boring. If the water is determined to be hazardous, it will be filtered through an activated carbon filtration system as described in Section 5.7. A verification sample of each potential waste stream that has been filtered will be analyzed by the appropriate analytical method to test for the characteristics by which the water was determined to be hazardous. If the water after verification sampling shows concentrations of constituents above any applicable federal, state, and or local regulations then the remaining waste will be disposed of according to applicable regulations.

Hydrocarbon contaminated soils, as determined by field headspace screening, will be segregated from soils determined by field screening not to be contaminated. Soils segregated by field screening techniques will await analytical results before a hazardous waste determination is made. Clean soil will be disposed of on-site by spreading soil cuttings on the ground surface. Soil determined to be characteristically hazardous will be shipped for off-site disposal at a permitted RCRA disposal facility. PPE and dry waste associated with these materials will be disposed of accordingly in a sanitary landfill pending analytical results.

4.8 Reporting Requirements

Following completion of the Phase II soil assessment, and all subsequent soil assessments, the results of the assessment activities will be summarized in a report submitted to the NMED along with copies of the laboratory results for the soil samples analyzed.

The report submitted after each assessment will include the following information, as applicable:

- a descriptive summary of work conducted and general conclusions
- soil boring logs, including:
 - 1) boring number
 - 2) dates drilling began and finished
 - 3) driller's name and company
 - 4) drill rig type
 - 5) bit/auger size
 - 6) borehole diameter
 - 7) total depth drilled
 - 8) depths sampled
 - 9) lithologic logs
- field screening results, including:

- 1) boring number
- 2) sample depth - interval
- 3) sample date
- 4) instrument type & detection limit
- 5) any pertinent field notes
- 6) sample results

- soil sampling information, including:

- 1) boring number
- 2) sample depth - interval
- 3) sample date
- 4) any pertinent field observations
- 5) sample parameters/methods
- 6) sample container types
- 7) sample handling procedures
- 8) copy of chain of custody
- 9) sample results & detection limits
- 10) any pertinent QA/QC information

- comparison of constituents detected with action levels and/or background levels and any QA/QC concerns

- cross-sections shall be constructed throughout source areas from both N-S and E-W directions using definable stratigraphic units which can be correlated according to:

- 1) particle size
- 2) mineral composition
- 3) and/or overall texture

- contour map(s) showing the concentrations and horizontal extent of contamination for key hazardous constituents identified from laboratory analysis
- a summary of the nature, rate, and extent of soil contamination at the site.

5. GROUND WATER ASSESSMENT PLAN

Concurrent with the ongoing soil assessment, a phased approach has been and will continue to be used to assess ground water contamination resulting from releases from the former impoundments. The objectives of the ground water assessment plan are as follows:

- Determine if additional interim stabilization measures (ISM) are required
- Establish the extent of contamination within the uppermost aquifer
- Confirm that deeper aquifers have not been affected by the release from the former surface impoundments
- Continue to refine the current understanding of ground water flow direction(s), vertical and horizontal hydraulic gradient, and velocity(ies)
- Determine aquifer hydraulic parameters for ground water flow and contaminant transport calculations.

The current ground water monitoring network consists of nine wells completed within the uppermost aquifer and one well completed within a perched zone (Figure 3-6). Information collected from additional monitor wells will help to refine the current picture of ground water flow direction, background ground water quality, and the nature, rate, and extent of ground water contamination in the uppermost aquifer.

Deeper monitor wells may be needed to determine the vertical extent of contamination. The installation of deeper monitor wells will follow the same investigative approach as the shallower ground water monitor well installation and assessment activities.

5.1 Phase I Ground Water Assessment

The Phase I ground water assessment was completed during the August 1995 assessment activities. This assessment included the following tasks related to ground water assessment:

- installation and development of three ground water monitoring wells downgradient of the former impoundments (Figure 3-6)
- redevelopment of existing monitor wells MW-3, MW-5, and MW-6
- installation of dedicated sampling pumps in existing monitor wells MW-3, MW-5, and MW-6 and in the new monitor wells MW-7, MW-8, and MW-9
- sampling of all new and existing monitor wells
- aquifer tests to estimate hydraulic conductivity
- water level measurements were obtained in the new and existing monitor wells in order to establish the ground water flow direction and gradient.

A Phase I Soil and Ground Water Assessment Report (DBS&A, 1995) was subsequently prepared and submitted to the NMED.

The three additional downgradient ground water monitor wells appear to indicate that the lateral extent of affected ground water is very limited. Transwestern will attempt to confirm this by completing the scope of the Phase II assessment.

5.2 Phase II Ground Water Assessment

A Phase II Soil and Ground Water Assessment Plan (DBS&A, 1995) was prepared and

submitted to the NMED in December, 1995. The primary objective of this plan, as it relates to the characterization of affected ground water, is to delineate the lateral extent of affected ground water in the uppermost aquifer.

Six additional ground water monitor wells will be installed in the uppermost aquifer to delineate the extent of the dissolved-phase plume near the former impoundments (Figure 4-1). In addition, as many as three additional monitor wells (in addition to the six indicated in Figure 4-1) may be installed in the off-site area downgradient of the former impoundments if warranted based on field observations.

Prior to well installation, soil borings will be drilled to the total depth, approximately 10 feet below the water table, at each location with minimum 6-inch-O.D. augers. Soil samples will be collected at 10-foot intervals during the drilling of the pilot hole using the procedures described in Section 4, and field headspace screening will be performed using a PID, as described in Section 4. Soil grab samples will also be collected periodically during drilling to better define the geologic conditions at the site. All soil samples will be collected in accordance with DBS&A SOP 13.3.2, Soils Logging, Sampling, Handling, and Shipping for Geotechnical and Chemical Analyses (Appendix D).

The monitor wells will be installed within the hollow-stem augers following the completion of the soil boring. Immediately prior to well construction, the total depth of the borehole will be determined using a clean, weighted steel tape or tag line.

The monitor wells will be constructed of 2-inch diameter schedule 40 PVC pipe and will include, in ascending order, a flush-threaded silt trap (sump) at the bottom, 10 to 25 feet of flush-threaded 0.01-inch machine-slotted PVC screen, and blank casing from the top of the screen to ground surface. No more than 15 feet of screen will be installed below the water table.

Once the well casing has been lowered to the bottom of the borehole, a sandpack consisting of 12-20 silica sand will be poured down the annulus of the auger in 3-foot lifts. After each 3-foot

interval is filled, the augers will be pulled up approximately the same distance. This procedure will be repeated until the sand pack level is approximately 2 feet above the top of the screened section. The annular space above the sand pack will then be filled with a minimum 2-foot-thick pelletized bentonite seal, which will be hydrated with distilled water. The remaining annular space will be filled with a cement/bentonite slurry grout consisting of approximately 3 percent bentonite by weight. The top of the well casing will be protected by a PVC cap, and the exposed casing will be protected by a locking steel shroud. A 6-inch-thick concrete pad will then be constructed around the shroud. Generalized monitor well construction details are shown in Figure 5-1.

Immediately following well installation, the new monitor wells will be developed following the procedures outlined in Section 5.4.

Ground water samples will be collected from the six existing monitor wells MW-3, MW-5, MW-6, MW-7, MW-8, and MW-9 and from all newly installed monitor wells. Ground water samples will be collected following the procedures outlined in Section 5.5. Ground water samples will be analyzed as described in the Phase II plan (DBS&A, 1995) for VOCs, PAHs, major ions, TDS, and metals regulated by the NMWQCC.

5.3 Subsequent Phases of Ground Water Assessment

5.3.1 Subsequent Phases to Complete Delineation of the Contaminant Plume

Subsequent phases of ground water assessment are anticipated and will be completed in order to fully meet the previously stated objectives of this plan. Prior to any additional assessment activity, Transwestern will develop and submit an assessment plan to the NMED for review and comment. Subsequent assessment plans will be similar in form and scope to the recently submitted Phase II assessment plan and, in general, will include:

- a clear statement of the objectives

- a description of the assessment strategy and methods to be employed
- a diagram indicating the locations of additional ground water monitor wells
- a sample collection and analysis plan
- a schedule for implementation and completion of the assessment activities.

The sample analysis plan for subsequent ground water assessments will be determined based upon the results of prior assessments. In regard to organic constituents, the sample analysis plan for subsequent ground water assessments will include all constituents previously detected and present at a significant concentration in Phase I and Phase II source area soil samples and Phase I and Phase II ground water samples. For this purpose, a significant concentration will be defined as a detection above the performance standards listed in Table 7-1 (for soil samples) and Table 7-2 (for ground water samples). Constituents may be eliminated from the sample analysis plan if it can be reasonably shown that a constituent was included because of an isolated detection anomaly and/or a laboratory introduced contaminant.

In regard to metal constituents, the sample analysis plan for subsequent ground water assessments will be based on statistical comparison of the observed concentrations of each element with its expected background concentration in ground water. Statistical techniques for determining whether a particular constituent is present above background levels will follow EPA guidance (EPA, 1989a, 1989b).

In addition to the installation of additional monitor wells in the uppermost aquifer, one (or more) downgradient deep monitor well will be installed into the deeper San Andres bedrock aquifer. The purpose of the deep well is to determine whether the bedrock aquifer has been impacted by the release from the former impoundments. The location of the deep bedrock monitor well will be determined based on the results of the Phase II ground water assessment. Drilling and well

installation procedures will be provided in a subsequent assessment plan.

5.3.2 Routine Ground Water Quality Monitoring

Upon completion of subsequent phases of ground water assessment to delineate the vertical and lateral extent of the contaminant plume, Transwestern will implement a routine ground water quality monitoring program.

Currently, there are six monitor wells (excluding the four currently in service as recovery wells) in the uppermost aquifer. In addition, there will be a minimum of five additional wells that will be installed during the Phase II plan implementation and at least one additional well to be installed to evaluate ground water quality in the deeper San Andres bedrock aquifer. In total, Transwestern anticipates there will be a minimum of 12 ground water monitor wells installed at the site and likely as many as 20 monitor wells installed by the time assessment is complete.

Ground water samples will be collected from all monitor wells during semi-annual sample events. The only wells which will not be sampled are those which contain PSH and MW-6. Monitor well MW-6 is excluded based on the presumption that the proposed monitor well MW-10 is confirmed to be a clean upgradient well. Monitor well MW-6, the current upgradient well, is located well beyond (and upgradient) the proposed location of MW-10. Monitor well MW-6, however, will continue to be used for ground water level measurements.

Ground water samples collected during the first semi-annual sampling event of each year will be delivered to a qualified laboratory for analysis for VOCs (EPA Method 8010/8020) only. Ground water samples collected during the second semi-annual sampling event of each year will be delivered to a qualified laboratory for analysis for VOCs (EPA Method 8010/8020) PAHs (EPA Method 8100), major ions, TDS, and metals regulated by the NMWQCC. In the event analyses indicate a metal constituent is non-detect in all monitor well samples for two consecutive sample events, then these constituents will be eliminated from the sample analysis plan for subsequent sample events. In addition, in the event Transwestern can demonstrate that analyses indicate a

metal constituent is within the range of background concentrations in all monitor well samples for two consecutive sample events, then these constituents will be eliminated from the sample analysis plan for subsequent sample events.

Ground water sampling procedures will follow those outlined in Section 5.5. The management of purge water and other ground water sampling related waste generated will be managed as outlined in Section 5.8.

The reporting of routine ground water sampling results will be included in the annual progress report as described in Section 8.2. The information included in the annual report will include the pertinent information outlined in Section 5.9.

5.4 Monitor Well Development Procedures

The newly installed monitor wells will be developed by a sequence of surging and pumping and/or bailing in accordance with DBS&A SOP 13.4.3, Well Development (Appendix D). Initially, the wells will be surged to dislodge any smeared material on the borehole wall that would otherwise inhibit ground water flow and to remove fine particles from the formation surrounding the borehole. The suspended sediments will be removed by bailing, pumping, or air lifting. During well development, pH, temperature, specific conductance, and turbidity (visual determination) will be monitored periodically to determine when the wells have been sufficiently developed. Development will be considered complete when the water becomes relatively clear and water quality parameters have stabilized to within ± 5 percent over three consecutive measurements.

5.5 Ground Water Sampling Procedures

Prior to ground water sample collection, the following preparations will be made:

1. The area around the wellhead will be inspected for integrity, cleanliness, and signs of possible contamination.
2. The cap on the wellhead will be removed and a flame ionization detector (FID) or photoionization detector (PID) will be used to determine if VOC vapors are present. Any obvious odors will be noted in the field logbook.
3. The static water level will be measured to the nearest 0.01 foot using an electrical water level sounder. The presence of any obvious contamination on the water level sounder will be noted in the field logbook. The sounder will be decontaminated between wells, as described in Section 5.6, in order to prevent cross contamination.
4. Prior to purging the wells, a clear bailer, hydrocarbon indicating paste, or an interface probe will be used to check for the presence of PSH. The presence or absence of PSH will be recorded in the field logbook, as well as the thickness of PSH, if any.
5. The well will then be purged to remove standing/stagnant water in order to ensure the collection of representative ground water samples. Monitor wells with dedicated bladder pumps will be purged at a rate equal to or greater than the anticipated sample collection flow rate. Monitor wells without dedicated bladder pumps will be purged by hand bailing with dedicated, disposable polyethylene bailers. The field parameters pH, electric conductivity, dissolved oxygen, and temperature will be measured throughout the purging process at a frequency of at least once per casing volume. Purging will continue for a minimum of three casing volumes and until the field parameters remain stable to within ± 5 percent over at least one casing volume, except if the well is a very poor producer. In this case, the well will be purged dry once prior to sample collection. All fluids produced during purging will be contained for later disposal as described in Section 5.7.

Following purging, unfiltered ground water samples will be collected as soon as possible using either a dedicated bladder pump or a dedicated disposable polyethylene bailer. Under no

circumstances will the well be allowed to stand for more than three hours after well purging before collecting samples. The only exception is for very low-yield wells that are pumped dry under normal purging and sampling rates. In this case, the well will be pumped dry and allowed to recover until sufficient water is present in the well to allow a sample to be collected.

The samples will be collected in order of decreasing volatility, with samples for VOC analysis being collected first. The pumping rate during sample collection of VOC samples at monitor wells with a dedicated bladder pump will be maintained at 100 milliliters (mL) per minute or less to minimize volatilization. All samples will be collected in precooled, acidified, certified-clean 40-mL glass vials with septum caps supplied by the laboratory. Following collection of the VOC samples, the SVOC, metals, and other samples will be collected in appropriate containers, as described in greater detail in Section 6.

Sample labeling, packaging, and chain-of custody procedures will be performed as described in Section 6.5. The sample coolers with the associated chain-of-custody forms will be shipped to the laboratory using an overnight commercial carrier. The fastest possible shipping method will be used, and all sample shipments will be carefully tracked to ensure that samples arrive intact and that all holding times are met.

5.6 Aquifer Testing

Aquifer slug tests will be performed on each of the monitor wells installed during the Phase II assessment activities. Data collected from the individual slug tests will be used to refine the estimate of hydraulic conductivity of the uppermost aquifer. All slug tests will be performed in accordance with the procedures described in DBS&A SOP 13.6.2, Slug Testing (Appendix D).

Slug tests are performed by causing a sudden change in the water level in the well and then measuring the water level recovery rate. Slug tests will be accomplished by either rapidly removing water from the water column or immersing a solid cylinder (slug) into the water column and measuring the resulting water level recovery. If the slug removal method is used

(rising head), water will be removed from the well using a bailer. If the slug immersion method is used (falling head), water will be displaced in the well using a clean, solid PVC cylinder. Whichever method is used, the slug will be of sufficient size to achieve an instantaneous water level change of at least 2 feet.

Water levels will be measured immediately prior to the aquifer test and throughout the recovery period until water levels have recovered to within approximately 95 percent of the static water level.

Standard aquifer testing equations will be used to estimate the hydraulic conductivity of both the uppermost aquifer and deep bedrock aquifer. Appropriate analytical procedures are presented in *Groundwater and Wells* (Driscoll, 1986) and *Analysis and Evaluation of Pumping Test Data* (Kruseman and de Ridder, 1992).

5.7 Decontamination Procedures

All non-disposable field equipment that may potentially come in contact with contaminated ground water or soils will be decontaminated in accordance with DBS&A SOP 13.5.2, Decontamination of Field Equipment (Appendix D), in order to minimize the potential for cross-contamination between sampling locations. Clean latex or plastic gloves will be worn during all decontamination operations. The following sequence of decontamination procedures will be followed prior to each sampling and/or testing event:

1. Wash the equipment in a solution of non-phosphate detergent (Liquinox[®]) and distilled/deionized water. Use a clean Nalgene[®] tub to contain the wash solution and a scrub brush to mechanically remove loose particles.
2. Rinse the equipment twice with distilled/deionized water.
3. Allow the equipment to air dry before the next use.

All wash water generated during equipment decontamination will be contained in 55-gallon drums for proper disposal. All liquids will be assumed to be contaminated and properly labeled as described in Section 5.8. Decontamination water will remain on-site pending the results of laboratory analysis of the associated ground water samples. The laboratory results for the ground water samples will be used to determine the method of disposal for the drummed wash water, as described in Section 4.7. All drilling equipment will be decontaminated as described in Section 4.6.

5.8 Management of Investigation-Derived Wastes

A variety of wastes will be generated during the implementation of the ground water assessment plan. These wastes include soil cuttings, decontamination fluids, used PPE, and ground water produced during well development and purging. Only wastes determined to be characteristically hazardous will be managed as RCRA hazardous wastes.

All liquid wastes will be drummed and labeled to identify the contents, date of generation, and amount of material generated. All waste containers generated during the ground water assessment will be stored in a designated drum storage area within the facility. If the water is determined to be hazardous, it will be filtered through an activated carbon filtration system as described in Section 5.7. A verification sample of each potential waste stream that has been filtered will be analyzed by the appropriate analytical method to test for the characteristics by which the water was determined to be hazardous. If the water after verification sampling shows concentrations of constituents above any applicable federal, state, and or local regulations then the remaining waste will be disposed of according to applicable regulations.

Hydrocarbon contaminated soils, as determined by field headspace screening, will be segregated from soils determined by field screening not to be contaminated. Soils segregated by field screening techniques will await analytical results before a hazardous waste determination is made. Clean soil will be disposed of on-site by spreading soil cuttings on the ground surface.

Soil determined to be characteristically hazardous will be shipped for off-site disposal at a permitted RCRA disposal facility. PPE and dry waste associated with these materials will be disposed of accordingly in a sanitary landfill pending analytical results.

All contaminated water and water that is potentially contaminated but cannot be associated with a particular sample or set of samples will be passed through an activated carbon filtration system to remove all organic constituents. A sample of the clean filtered water will then be collected for laboratory analysis of VOCs. A verification sample of each potential waste stream that has been filtered will be analyzed by the appropriate analytical method to test for the constituents by which the water was determined to be characteristically hazardous. If the water after verification sampling shows concentrations of constituents above any applicable federal, state, and or local regulations then the remaining waste will be disposed of according to applicable regulations.

Upon verification that the water is clean, it will be released to the ground surface on-site. The carbon filter, PPE, and dry refuse associated with these materials will be disposed of properly pending analytical results.

5.9 Reporting Requirements

Following completion of the Phase II ground water assessment, and all subsequent ground water assessments, the results of the assessment activities will be summarized in a report submitted to the NMED along with copies of the laboratory results for the ground water samples analyzed.

The report submitted after each assessment will include the same information, if relevant, as described in Section 4.8 for the soil assessment reporting. In addition, the report will include the following information, as applicable:

- ground water sampling information
 - 1) monitor well ID
 - 2) sample date - time

- 3) field observations (i.e., presence of PSH, turbidity, odor, etc.)
 - 4) sample parameters/methods
 - 5) sample container types
 - 6) sample handling procedures
 - 7) copy of chain of custody
 - 8) sample results & detection limits
 - 9) any pertinent QA/QC information
- comparison of constituents detected with previous sample results, action levels, and/or background levels and any QA/QC concerns
 - water table elevation map indicating hydraulic gradient and ground water flow direction
 - PSH distribution map indicating the lateral estimated extent of PSH at the water table
 - contaminant distribution map(s) showing the concentrations and horizontal extent of contamination for key hazardous constituents identified from laboratory analysis
 - discussion and results from any aquifer testing.

6. QUALITY ASSURANCE PROJECT PLAN

This section describes the procedures that will be followed to ensure that the data obtained during this investigation will be adequate for the project objectives. The Quality Assurance Project Plan (QAPP) presented herein describes the laboratory analyses to be performed, data quality objectives, and quality assurance/quality control (QA/QC) procedures to be used to ensure that project objectives are met. Sections 6.1 through 6.12 have been prepared in accordance with the *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans* (U.S. EPA, 1983), and are those elements required for consideration in any QAPP, according to EPA.

6.1 Analytical Parameters and Methods

Based on previous investigations, petroleum hydrocarbons, SVOCs, and the chlorinated solvent 1,1,1-TCA are recognized as the principal constituents of concern in soil and ground water at the site. However, in order to ensure that other constituents are not present, initial characterization included nearly all of the Appendix IX constituents. Accordingly, soil and ground water samples collected as described in Sections 4.1 and 5.1 of this closure plan were analyzed for the suite of target analytes listed in Table 6-1.

In addition, ground water samples will be analyzed for major cations and anions and total dissolved solids in order to characterize the overall water quality. Total petroleum hydrocarbons (TPH) will also be determined for soil samples. Analytical methods for all parameters will follow standard RCRA procedures specified in *Test Methods for Evaluating Solid Waste* (SW-846) (EPA, Third Editin, Update II).

6.2 Data Quality Objectives

Data quality objectives (DQOs) are the qualitative and quantitative objectives established to

ensure that the data generated meet the needs of the project. Therefore DQOs are project- specific and depend largely on the ultimate use for which the data are intended. DQOs have been established for this project in accordance with EPA guidance documents, particularly *Data Quality Objectives for Remedial Response Activities* (U.S. EPA, 1987a), and *RCRA Ground Water Monitoring: Draft Technical Guidance* (U.S. EPA, 1992). The parameters used to quantify data quality include precision, accuracy, representativeness, completeness, and comparability (PARCC).

Objectives or goals for the so-called PARCC parameters (U.S. EPA, 1987a) constitute the project-specific DQOs for a particular investigation. Each PARCC parameter is described below, along with the proposed DQO for this closure plan, where applicable. The proposed DQOs for this investigation are summarized in Table 6-1.

- **Precision** is a quantitative measure of the reproducibility (or variability) of the analytical results. Precision will be calculated by determining the relative percent difference (RPD) between the concentrations reported for field duplicate samples collected from the same location. Methods for collecting duplicate field samples are discussed in Section 5.3. The proposed RPD precision objective is 20 or less.
- **Accuracy** is defined as the degree to which the reported analytical result approaches the "true" value. Accuracy will be estimated through the analysis of matrix spikes (MS). The percent recovery (%R) of the "true" spike concentration will be calculated for each MS. The accuracy objective is within the range of 80 to 120 percent recovery of the matrix spike.
- **Representativeness** refers to how well the analytical data reflect subsurface contaminant concentrations. Due to numerous site-specific factors, such as the degree of heterogeneity in the subsurface, representativeness is difficult to define and even more difficult to quantify. For this project, representative data will be attained through the use of

consistent and approved sampling and analytical procedures and through a well defined sampling plan that specifies adequate investigation of all areas of concern.

- **Completeness** is the percentage of samples collected that meet or exceed the DQOs for precision, accuracy, and representativeness, as estimated from the analysis of QA/QC samples described above. The completeness objective for this project is 90%.
- **Comparability** is an assessment of the relative consistency of the data. No quantitative method exists for evaluating comparability; hence, professional judgment must be relied upon. Internal comparability of the soil and ground water data set will be achieved by the use of consistent sampling and analysis procedures throughout the project. Likewise, by using identical analytical methods to those employed during previous investigations, the data generated during this investigation will be comparable with existing data.

6.3 Quality Assurance/Quality Control Samples

QA/QC samples include matrix spikes/matrix spike duplicates (MS/MSD), field duplicates, trip blanks, and equipment blanks. EPA guidance recommends that QA/QC samples be collected at a minimum 5-percent frequency (U.S. EPA, 1987). For this project, both soil and ground water QA/QC samples will be analyzed at this frequency.

Equipment blank samples are collected in order to determine if any of the analytes detected in environmental samples may be attributable to improper and/or incomplete decontamination of field sampling equipment. Equipment blanks will be collected in the following manner. After the sampling device has been decontaminated in accordance with DBS&A SOP 13.5.2, Decontamination of Field Equipment (Appendix D), it will be rinsed with deionized water. The rinsate will be collected and sent to the laboratory as an equipment blank.

Field duplicate samples will be collected to provide a measure of precision for the analytical results. VOC soil duplicates will be collected by submitting two adjacent brass liner rings from

the same split-barrel sample. The ground water duplicate samples will be collected by filling sample containers in an alternating manner following the sampling protocol described in Section 5.3 of this closure plan.

One VOC trip blank will accompany each shipment to the laboratory. VOC trip blanks are prepared as a check on possible contamination originating from container preparation methods, shipment, handling, storage, or other site-specific conditions. VOC trip blanks will consist of deionized, organic-free water added to a clean 40-mL glass septum vial.

In addition to the above QA/QC samples, MS/MSD analyses will be performed in the laboratory by spiking the soil or water samples with a known quantity of the analyte of interest. MS/MSD analyses are performed to determine laboratory accuracy and precision and to determine if any matrix interferences exist. MS/MSD analysis will be specified on the chain-of custody form for at least 5 percent of the samples collected.

6.4 Sampling Procedures

The soil and ground water sampling procedures described in Sections 4 and 5 will be performed in accordance with DBS&A SOPs 13.3.2 and 13.5, respectively (Appendix D). A summary of the analytical methods, required sample volumes, containers, and sample preservation is provided in Table 6-2. All sample containers will be acquired from the laboratory and will be certified clean.

Adhesive labels will be applied to the sample containers, and a waterproof marking pen will be used to complete the labels. Information will include the date and time of sample collection, type of analysis to be performed, preservative used (if any), depth of sample (for soils), and the initials of sampling personnel. The containers will be sealed and placed in clear plastic bags. The sealed containers will be put in coolers on bags of ice or frozen ice packs. Plastic bubble pack or other suitable packing material will be used to prevent breakage.

The field personnel will ship the sample coolers to the laboratory using an overnight courier service. The fastest possible shipping method will be used, and all sample shipments will be carefully tracked to ensure that samples arrive intact and that all holding times are met.

6.5 Chain of Custody Procedures

For analytical data to be valid, samples must be traceable from the time of collection through chemical analysis and final disposition. Chain-of-custody forms have been developed for this purpose. The necessary blank documents will be obtained from the laboratory, including chain-of-custody forms and seals.

Chain-of-custody forms will be completed in triplicate. The original form and one copy will be placed inside each cooler, and one copy will be retained by field personnel. The chain-of-custody forms accompanying each cooler will be sealed in a plastic bag and taped to the inside of the cooler lid. Each cooler will have a clearly visible return address. The cooler lids will be secured with shipping tape that encircles the cooler ends. A chain-of-custody seal will be placed at the front left and rear right sides of the cooler so that opening the lid will break the chain-of-custody seals.

Field activities and sample collection will be documented in a bound logbook dedicated to the project. For each sample, the location, time, monitor well/boring number, sample depth, sample volumes and preservation, and other pertinent field observations will be recorded. Each page of the logbook will be dated, numbered, and signed by those individuals making entries.

6.6 Equipment Calibration Procedures and Frequency

Numerous instruments will be used in the field and the laboratory during this investigation. In order for reliable data to be generated, it is important that these instruments be routinely calibrated. Calibration of analytical instruments within the laboratory will be the responsibility of the contracted laboratory. Although the details of the laboratory calibration procedures are

beyond the scope of this QAPP, the frequency of initial and continuing calibrations will adhere to established EPA protocols, as described in the analytical method (U.S. EPA, 1986). In addition, the laboratory's QA manual will be available for review upon request.

During this investigation, DBS&A anticipates using the following field equipment:

- PID (Thermo Environmental 580B or equivalent)
- FID type OVA (Foxboro 108 or equivalent)
- Salinity-conductivity-temperature (SCT) meter (YSI Model 33 or equivalent)
- pH meter (Orion Model 250A or equivalent)
- Dissolved oxygen (DO) meter (YSI Model 57 or equivalent)
- Water level indicator (Solinst or equivalent)
- PSH interface meter (Solinst or equivalent)

Calibration and maintenance procedures for each of these instruments are described in the following paragraphs. Documentation of daily calibration for each of these instruments will be recorded in the field logbook, along with any required maintenance procedures performed.

A PID and/or FID will be used to screen soil samples for volatile organic compounds using the headspace method. The PID or FID will also serve for health and safety monitoring of the work area for organic vapors. Background VOC concentrations will be recorded daily in the logbook. The PID and/or FID will be calibrated daily with standard isobutylene (PID) or standard methane (FID). Recalibration of the PID and/or FID can occur during the work day at the discretion of the site health and safety officer in the event of suspect readings. Care will be taken to ensure that the PID and/or FID remains free of sand and dirt. The battery will be charged on a daily basis.

The SCT meter calibration will be checked initially with a standard potassium chloride solution and mercury thermometer, and a battery check will be performed daily prior to beginning field work. In the event of erratic measurements, the instrument calibration will be checked in the field. When not in use, the electrode will be kept immersed in deionized water to keep the

platinum black surfaces fully hydrated, in accordance with manufacturers' instructions.

Prior to use each day, the pH meter will be calibrated using two pH buffers. The buffer solutions will be chosen to bracket the expected ground water pH range. Calibration of the instrument will be periodically checked throughout the day using the pH buffers to ensure accurate readings. In the event of instrument drift, the pH meter will be recalibrated. The electrode will be rinsed with deionized water following each measurement and placed in the appropriate potassium chloride storage solution.

The DO meter will be calibrated in air by adjusting the calibration control until the oxygen concentration reads the correct value for the elevation and temperature at the site. The DO meter calibration will be checked periodically during the day and recalibrated if necessary.

The water level indicator will be initially calibrated against a steel tape, prior to commencement of field activities. The battery and electrical connections will be periodically checked to ensure proper functioning of the instrument. The indicator probe and tape will be rinsed clean following each measurement. The PSH interface meter will be calibrated in a similar manner following manufacturer's instructions.

6.7 Data Reduction and Reporting

Data reduction will be performed by the laboratory in accordance with EPA protocols for the respective analytical method. Data from the analytical laboratory will be reviewed following the laboratory's internal QA/QC plan. All EPA required elements will be provided with the data package. If the analytical data do not meet the minimum data quality objectives, the laboratory will implement the corrective actions described in Section 6.10. All data falling outside the quality control limits defined in this QAPP will be flagged by the laboratory, as required by EPA protocol. Any discrepancies noted in the laboratory QA review will be noted in the case summaries included with the data packages.

Following the field investigation phase of the project, the degree to which the data quality objectives have been met will be examined by comparing the actual results for the QA/QC samples with the objectives listed in Table 6-1. The results of this comparison will be tabulated in the final report, along with detailed descriptions of any deviations from the protocols proposed in this closure plan.

6.8 Internal Quality Control Checks

The specific quality control checks to be used are included with the individual analytical methods specified for each parameter. The quality control criteria for VOCs and TPH (gasoline) are described in *Test Methods for Evaluating Solid Wastes - SW-846*, (U.S. EPA, 1986).

6.9 Performance and System Audits

Performance and system audits are the practices followed by analytical laboratories to evaluate quality control procedures and laboratory performance (U.S. EPA, 1983). System audits are performed in order to assess whether a new analytical system is functioning properly. Performance audits rate the ongoing performance of the laboratory in terms of the accuracy and precision of the analytical data generated. Examples of performance audits include the analysis of performance evaluation samples, such as standard reference materials obtained from the National Institute of Standards and Technology or EPA, or participation in interlaboratory performance evaluation studies using "round-robin" samples. Each participating laboratory is graded and ranked based on the results. The performance and system audits of the laboratory contracted for this closure plan will be provided and available for review.

6.10 Corrective Actions

If QA activities reveal apparent problems or deficiencies with the analytical data, corrective actions must be applied. The type of corrective action depends on the specific problem that occurs, but a general sequence of corrective actions will be followed. If the data do not fall

within the prescribed data quality objectives, the affected samples will be re-analyzed by the laboratory until the objectives are met. Any data falling outside QC limits will be flagged and qualified to explain the nature of the data quality problem.

6.11 Routine Data Assessment Procedures

Routine procedures to assess the precision, accuracy, and completeness of the analyses include RPD for field duplicates and MS/MSD samples, as well as percent recovery (%R) for MS samples. The specific statistical techniques to be used are described with the appropriate analytical method (U.S. EPA, 1986). Any problems or deficiencies will be reported to the NMED in the quarterly progress reports, or by telephone, if warranted by the nature and urgency of the problem.

6.12 Quality Assurance Reports to Management

Periodic assessment of data accuracy, precision, and completeness will be performed by the QA manager of the contracted laboratory. The results of these assessments, as well as the results of laboratory performance and system audits, will be available upon request. The laboratory QA manager will also review the case narratives and accompanying analytical data package to ensure that all data quality objectives are met. In the event that objectives are not met, the QA manager will consult with the laboratory manager to correct the problem.

7. REMEDIATION OBJECTIVES AND PRELIMINARY STRATEGY

7.1 Statement of Remediation Objective

Transwestern intends to close the former impoundments and remediate affected soil and ground water which resulted from a release from the former impoundments in such a manner whereby any hazardous constituents that may be present are removed to the extent that future threats to human health and the environment attributable to the facility no longer exist.

7.2 Performance Standards for Soil

The numerical performance standards for both organic and inorganic constituents in soil are included in Table 7-1.

7.2.1 Total Petroleum Hydrocarbons and BTEX Constituents in Soil

In regard to remediation of soils affected by elevated levels of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) constituents, Transwestern will adopt the guidelines of the OCD as specified in the guidance document "Guidelines for Remediation of Leaks, Spills and Releases" which was issued by the OCD on August 13, 1993. A copy of this reference is included in Appendix A.

Based on these guidelines, the performance standard for benzene in soil is 10 mg/kg and the performance standard for Total BTEX (the sum of the four BTEX constituent concentrations) is 50 mg/kg. The performance standard for TPH in soil will be either 1000 mg/kg or 5000 mg/kg, dependent upon the depth to ground water of "present or foreseeable beneficial use". This depth will be determined in the course of the assessment of the deeper San Andres aquifer.

In order to achieve this performance standard, the measured concentration of TPH, benzene, and

Total BTEX in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a TPH concentration greater than 5 times the performance standard or a benzene or Total BTEX concentration greater than 2.5 times the performance standard. For the purpose of this determination, EPA Method 418.1 will be used to evaluate soil samples for TPH and EPA Method 8020 or EPA Method 8240 will be used to evaluate soil samples for BTEX constituents.

7.2.2 Other Organic Constituents in Soil

In the absence of performance standards for soil remediation of other organic constituents established by State of New Mexico regulations, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. For those organic constituents for which a TNRCC Risk Reduction Standard 2 criteria is not available, Transwestern will adopt by reference the soil screening levels (SSLs) for transfers from soil to ground water listed in the USEPA Region III risk-based concentration table issued on October 20, 1995, "Risk-Based Concentration Table, July - December 1995". A copy of this reference is included in Appendix C.

In order to achieve this performance standard, the measured concentration of each organic constituent in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a concentration greater than 2.5 times the performance standard. For the purpose of this determination, EPA Method 8010/8020 or EPA Method 8240 will be used to evaluate soil samples for VOCs and EPA Method 8100 or EPA Method 8270 will be used to evaluate soil samples for PAHs.

7.2.3 Inorganic Constituents in Soil

Because many metal constituents are naturally occurring in soil, a two phased approach will be used to evaluate soil potentially affected by inorganic constituents. First, a determination will be

made whether the measured concentration of inorganic constituents in a soil sample is within the range of background concentrations. If so, no further consideration is necessary, if not, the measured concentration for those inorganic constituents outside the range of background concentrations will be subject to a performance standard.

For the purpose of this plan, a measured concentration of an inorganic constituent which falls within 3 standard deviations (99.7 percent range) of the mean concentration will be considered within the range of background concentrations. Mean background concentrations will be established from published literature and/or site specific information if available. In addition, the upper limit of the range of background concentrations (i.e., 3 standard deviations above the mean concentration) for each inorganic constituent will establish a floor for the performance standard for that constituent.

In the absence of performance standards for soil remediation of inorganic constituents established by State of New Mexico regulations, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. For those inorganic constituents for which a TNRCC Risk Reduction Standard 2 criteria is not available, Transwestern will adopt by reference the soil screening levels (SSLs) for transfers from soil to ground water listed in the USEPA Region III risk-based concentration table issued on October 20, 1995, "Risk-Based Concentration Table, July - December 1995". A copy of this reference is included in Appendix C. For those inorganic constituents for which neither a TNRCC Risk Reduction Standard 2 criteria or an SSL is available, the performance standard will be established at 100 times the risk-based concentration level for tap water as listed in the USEPA Region III risk-based concentration table document (i.e., 100 times the risk-based concentration for tap water in mg/L would become the performance standard for soil in mg/kg). Finally, as previously discussed, the performance standard will be subject to a floor established at the upper limit of the range of background concentrations.

In order to achieve this performance standard, the measured concentration of each inorganic

constituent in 90 % of all confirmation soil samples must be below the established performance standard and no single soil sample may contain a concentration greater than 2.5 times the performance standard. For the purpose of this determination, the analytical methods listed in Table 6-1 will be used to evaluate soil samples for inorganic constituents

7.3 Performance Standards for Ground Water

The numerical performance standards for both organic and inorganic constituents in ground water are included in Table 7-2.

7.3.1 Organic Constituents in Ground Water

In regard to remediation of ground water affected by elevated levels organic constituents, Transwestern will adopt the current NMWQCC standards as specified in Appendix B. For those organic constituents for which a NMWQCC standard is not available, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. For those organic constituents for which neither a NMWQCC standard or a TNRCC Risk Reduction Standard 2 criteria is available, the performance standard will be established at the risk-based concentration level for tap water as listed in the USEPA Region III risk-based concentration table issued on October 20, 1995, "Risk-Based Concentration Table, July - December 1995". A copy of this reference is included in Appendix C.

In order to achieve these performance standards, the concentration of each organic constituent of concern must be measured below the established performance standard at all monitor well locations for a minimum of four consecutive semi-annual ground water monitoring events. For the purpose of this determination, EPA Method 8010/8020 or EPA Method 8240 will be used to evaluate ground water samples for VOCs and EPA Method 8100 or EPA Method 8270 will be used to evaluate ground water samples for PAHs.

7.3.2 Inorganic Constituents in Ground Water

Because many metal constituents are naturally occurring in ground water, a two phased approach will be used to evaluate ground water potentially affected by inorganic constituents. First, a determination will be made whether the measured concentration of inorganic constituents in a ground water sample is within the range of background concentrations. If so, no further consideration is necessary; if not, the measured concentration for those inorganic constituents outside the range of background concentrations will be subject to a performance standard.

For the purpose of this plan, a measured concentration of an inorganic constituent which falls within 3 standard deviations (99.7 percent range) of the mean concentration will be considered within the range of background concentrations. Mean background concentrations will be established from site specific information available from unaffected monitor wells. In addition, the upper limit of the range of background concentrations (i.e., 3 standard deviations above the mean concentration) for each inorganic constituent will establish a floor for the performance standard for that constituent.

In regard to remediation of ground water affected by elevated levels inorganic constituents, Transwestern will adopt the current NMWQCC standards as specified in Appendix B. For those organic constituents for which a NMWQCC standard is not available, Transwestern will adopt by reference the Risk Reduction Standard 2 criteria established by the Texas Natural Resource Conservation Commission (TNRCC) [18 TexReg 3814 June 15, 1993]. Finally, as previously discussed, the performance standard will be subject to a floor established at the upper limit of the range of background concentrations.

In order to achieve these performance standards, the concentration of each inorganic constituent of concern must be measured below the established performance standard at all monitor well locations for a minimum of four consecutive semi-annual ground water monitoring events. For the purpose of this determination, the analytical methods listed in Table 6-1 will be used to evaluate ground water samples for inorganic constituents.

7.4 Provision for Setting Risk Assessment Based Performance Standards

Transwestern realizes that it may not be technically practicable or from a risk-based perspective necessary to remediate soil and ground water to the generically derived and overly conservative performance standards set out in Sections 7.2 and 7.3. Therefore, if warranted, Transwestern will propose alternate performance standards based on a site specific risk assessment. Because risk assessment methodology has been advancing at a rapid pace in recent years, Transwestern will defer on committing to an existing reference or methodology but will commit to utilized the most appropriate at the time a proposal may be prepared.

7.5 Provision for Technical Impracticability & Alternative Remedial Strategies

In the event it becomes apparent that the chosen remedial strategy is technically incapable or technically impracticable to achieve the remediation objectives, Transwestern will evaluate and propose an alternative remedial strategy which would provide long-term protection of human health and the environment.

7.6 Anticipated Remediation Technology to Address Affected Near-Surface Soils

In the course of the Phase I assessment activities, soil samples were collected from the most highly affected soils located within the former Pit 1 and Pit 2 areas at depths ranging from 4 to 12 feet bgs. These soils contained a high concentration of petroleum hydrocarbon as indicated by the lab results for TPH, particularly the soils located immediately beneath the former Pit 1 area. As a result of the heavy content of petroleum hydrocarbon in the soil matrix, in-situ methods for remediation are not likely to be effective, primarily because there is very little pore space available for the introduction or extraction of treatment fluids or soil vapors. In light of this situation, ex-situ remediation techniques are anticipated for the most highly affected near surface soils.

Three remediation techniques/methods, or some combination of the three techniques, will be employed for the remediation of near surface soils: off-site removal, on-site treatment by soil washing, and on-site treatment in constructed bio-treatment piles. Each of these methods would by necessity be preceded by excavation of the highly affected soil.

It should be noted that ex-situ remediation techniques can only be implemented so long as excavated contaminated media is characterized as non-hazardous. Based on the results for soil samples collected in the course of the Phase I assessment activities, Transwestern anticipates that excavated contaminated media will not be characteristically hazardous.

During excavation of the highly affected near surface soils, the excavated media will be segregated on-site by the relative content of petroleum hydrocarbon contained in the media. More specifically, media will be segregated into that which can reasonably be treated on-site in bio-treatment piles and that which is so heavily affected that bio-treatment would be difficult. The more heavily affected near surface soil would then either be removed to an appropriate and permitted facility for disposal, or treated on-site by soil washing techniques if the volume is sufficiently large enough to make on-site treatment by soil washing economically feasible.

The contaminated media segregated for on-site treatment in bio-treatment piles will be processed through soil screening/crushing equipment (such as a Kolberg soil screening plant commonly used in the construction industry) and placed back into the excavated area to create one large treatment cell or into piles to create several smaller and separate treatment cells. Whether one large treatment cell or several smaller treatment cells are created will depend upon the actual volume of soil to be treated, the anticipated post-processing TPH concentration, and the performance standard for TPH (i.e., 1000 or 5000 mg/kg) which will be determined during the course of subsequent assessment activities as discussed in Section 7.2.1. During the course of soil processing, amendments will be added to the soil to enhance the biological destruction of the petroleum hydrocarbon compounds. In addition, a conveyance system for the continued addition of air and moisture may be incorporated into the construction of the treatment cell(s).

The bio-treatment cells will be actively managed, if necessary, until which time all applicable performance standards are met and have been confirmed by the collection and analysis of confirmation samples.

7.7 Anticipated Remediation Technology to Address Affected Deeper Soils

The affected deeper soils (greater than 14 feet bgs) beneath and adjacent to the former Pit 1 and Pit 2 areas (and any other potential source areas which are determined to contain constituents of concern above performance standards) will be remediated primarily by soil vapor extraction (SVE) and bioventing technologies. These technologies would be implemented sequentially (i.e., SVE then bioventing).

The affected deeper soils are primarily affected by lighter end petroleum hydrocarbon compounds typically found in pipeline condensate and are readily amenable to SVE and bioventing. Transwestern anticipates that this will be accomplished utilizing a grid of SVE wells constructed such that soil vapor could be extracted from two distinctly separate horizons; one between approximately 14 feet bgs and the perching clay layer found at a depth of about 30 feet bgs, and the other between the lower boundary of the perching clay layer and the water table of the uppermost aquifer.

The grid spacing for SVE wells will be determined in the course of the SVE pilot test which will be conducted during the Phase II activities. At this time, it is anticipated that the spacing will be on the order of 60 feet from one well center to the next. The total number of SVE wells required within each horizon will be dependent upon the lateral extent of affected soil at each horizon. Although this will be determined to some extent during subsequent assessment activities, the lateral extent will be even more closely defined as soil samples are collected and evaluated in the course of drilling soil borings to install SVE wells. That is, the SVE well grid will be extended by additional wells until the lateral extent of affected soil has been defined by an outer boundary of SVE well borings that will produce soil samples below the performance standards for soils.

Each SVE well will be connected to a manifold via a vapor conveyance system. The vapor conveyance system will be constructed such that vapor can be extracted (or introduced during subsequent bioventing operation) and vapor samples can be collected from each SVE well independently.

The manifold will convey the extracted vapor to a vapor treatment system. At this time, Transwestern anticipates that the vapor treatment system will consist of a prepackaged, combination blower/incinerator unit such as one manufactured by Baker Furnace. Due to the concentration of VOCs anticipated to be contained in the pre-treatment vapor stream, an air permit will be required from the NMED Air Pollution Control Bureau for the vapor treatment system prior to startup of the system.

As operation of the SVE system progresses, VOC concentrations in extracted vapor will decline. When VOC concentrations have declined to the point at which a determination is made that bioventing will more cost effectively continue the remediation of affected deeper soil, then the SVE conveyance system will be utilized for the introduction of air into the SVE wells. This will facilitate the destruction of remaining petroleum hydrocarbons by in-situ biological activity.

The SVE system and the subsequent bioventing system will be operated and maintained until which time all applicable performance standards are met and have been confirmed by the collection and analysis of confirmation samples.

7.8 Anticipated Remediation Technology to Address Phase Separated Hydrocarbon

The removal of phase separated hydrocarbon (PSH) will be accomplished primarily by the same SVE system installed for remediation of the affected deeper soils. In addition to SVE as a method for removing PSH, SVE wells located in the area (or areas) containing PSH at the water table may be modified such that dual phase extraction can be implemented.

In order to implement dual phase extraction, a small diameter (about 0.75" diameter) tube is set

inside the SVE well to just below the depth of PSH in the well casing and a vacuum is applied to the tube such that both vapor and liquid phases are removed from the well. This removal method has an advantage over SVE alone for removing less volatile liquid hydrocarbons.

In the event it is determined that a significant mass of residual phase hydrocarbon remains in the soil matrix below the water table, Transwestern will consider partially dewatering the uppermost aquifer in the area containing residual phase hydrocarbon so that the contaminants can more effectively be removed by the SVE system.

7.9 Anticipated Remediation Technology to Address Affected Ground Water

The anticipated technology for remediation of affected ground water is by in-situ enhancement of aerobic biodegradation.

Two technologies will be employed to accomplish the in-situ enhancement of aerobic biodegradation: 1) direct injection of oxygen as a component of air below the water table (i.e. air sparging); and 2) replacement of oxygen depleted soil vapor with oxygen rich soil vapor in the unsaturated zone above the water table (i.e. soil vapor extraction). These two technologies are commonly employed together as a system. In this arrangement, the primary objective of air sparging is to increase the concentration of dissolved oxygen in ground water thereby enhancing aerobic biodegradation of dissolved phase hydrocarbon compounds; and the primary objective of SVE is to control the potential migration of volatile organic compounds away from the impacted area and to enhance the aerobic biodegradation of hydrocarbon compounds trapped above the ground water table.

The air sparging process involves the injection of air under pressure at an air sparge well screened below the water table. The air migrates upward through the soil column creating air filled channels in the saturated zone. As a result, sparged air increases the oxygen concentration in both the saturated and unsaturated zones, which enhances aerobic biodegradation. Furthermore, volatile organic compounds (VOCs) that are exposed to this sparged air

environment volatilize into the gas phase and are carried into the vadose zone where they may be biodegraded or removed by soil vapor extraction. Air sparging combined with soil vapor extraction, provides the following benefits:

- Removes VOCs in the saturated and capillary fringe zones where the mass is greatest;
- Enhances aerobic biodegradation of VOCs due to an increase in dissolved oxygen levels;
- Reduces clean-up times and cost savings over pump and treat and/or SVE alone;
- Minimizes ground water extraction and associated treatment and disposal costs;
- Removes any potential source of continuing dissolved phase contamination in the ground water; and
- Reduces the mass of potential dissolved phase contaminants.

The air sparge system and the associated SVE system will be operated and maintained until which time either the performance standards for ground water have been achieved or until it can be demonstrated that natural attenuation processes can continue the remediation of affected ground water without the assistance of the air sparging/SVE system.

8. PROJECT SCHEDULE & ROUTINE REPORTING REQUIREMENTS

8.1 Anticipated Project Schedule

The anticipated project schedule outlines key tasks which are either planned or anticipated to occur. The timeframe for the start and completion of each task is based on months from the start of the Phase II assessment activities currently scheduled to begin in August, 1996. In the event that the Phase II assessment activities are not initiated in August, 1996, all dates for all activities described below will shift by a period corresponding to the actual start of the Phase II activities. It should be noted that this is an “**anticipated**” schedule and is likely to require modification as the assessment and remediation activities proceed.

Task #	Task & Description	Start	Complete
1.	<i>Phase II Assessment Field Activities</i> Drill and sample four soil borings in the two known source areas for characterization of affected soil; install five additional monitor wells into the uppermost aquifer; install three SVE wells and complete an SVE pilot test; sample all existing and new monitor wells.	8/96	9/96
2.	<i>Phase II Assessment Report</i>	9/96	11/96
3.	<i>Phase III Assessment Plan</i> Install one or more monitor wells into the deeper San Andres aquifer; if necessary, install additional monitor wells into the uppermost aquifer; if necessary, advance additional soil borings to complete delineation of affected soil.	11/96	2/97
4.	<i>Phase III Assessment Field Activities</i>	3/97	4/97
5.	<i>Phase III Assessment Report</i> In addition to presenting the results of Phase III activities,	4/97	6/97

	this report will also serve as a summation of all soil and ground water assessment activities.		
6.	<i>Corrective Action Plan</i> Finalize corrective action plan for: affected near surface soils; affected deeper soils; removal of PSH; and affected ground water.	6/97	12/97
7.	<i>Implement CAP for Affected Near Surface Soils</i> Excavation and ex-situ treatment of highly affected soils.	8/97	12/97
8.	<i>Implement CAP for Affected Deeper Soils</i> Installation of SVE wells and vapor extraction and emission control equipment.	2/98	6/98
9.	<i>Implement CAP for Removal of PSH</i> Installation of PSH recovery wells and dual phase extraction equipment.	2/98	6/98
10.	<i>O&M of CAP for Tasks #8 & #9</i> Operation and maintenance of the SVE and dual phase extraction systems.	6/98	6/00
11.	<i>Implement CAP for Affected Ground Water</i> Installation of air sparge points and associated equipment; O&M of ground water remediation system until closure requirements are met.	6/00	6/05
12.	<i>Confirmation Soil and Ground Water Sampling</i>	6/05	12/05
13.	<i>Final Closure Report</i>	12/05	6/06

Not included in the schedule above are the annual progress reports described in Section 8.2.

Additional tasks may also be included in the schedule as they become necessary. One such task would be a proposal to modify performance standards for affected soil and/or ground water based upon a site specific risk assessment. A second potential task would be a proposal for the

evaluation of alternative remedial strategies due to technical impracticability of the selected remediation technologies.

8.2 Routine Reporting Requirements

Annual progress reports will be prepared and submitted to the NMED for review from the time field work begins until closure is achieved. The annual progress reports will be submitted by the 31st day of March for the preceding year with the first report submitted by March 31, 1997. The progress reports will provide a means of tracking the schedule for investigative and corrective action activities and explain the need for any modifications to the proposed project schedule. The reports will document work performed during the preceding period and will include the following information:

- copies of the results of all laboratory analyses and a summary of results
- discussion of all hydrogeologic data collected
- discussion of the performance and efficiency of each aspect of the remediation program
- discussion of maintenance procedures performed
- discussion of progress of remediation toward closure

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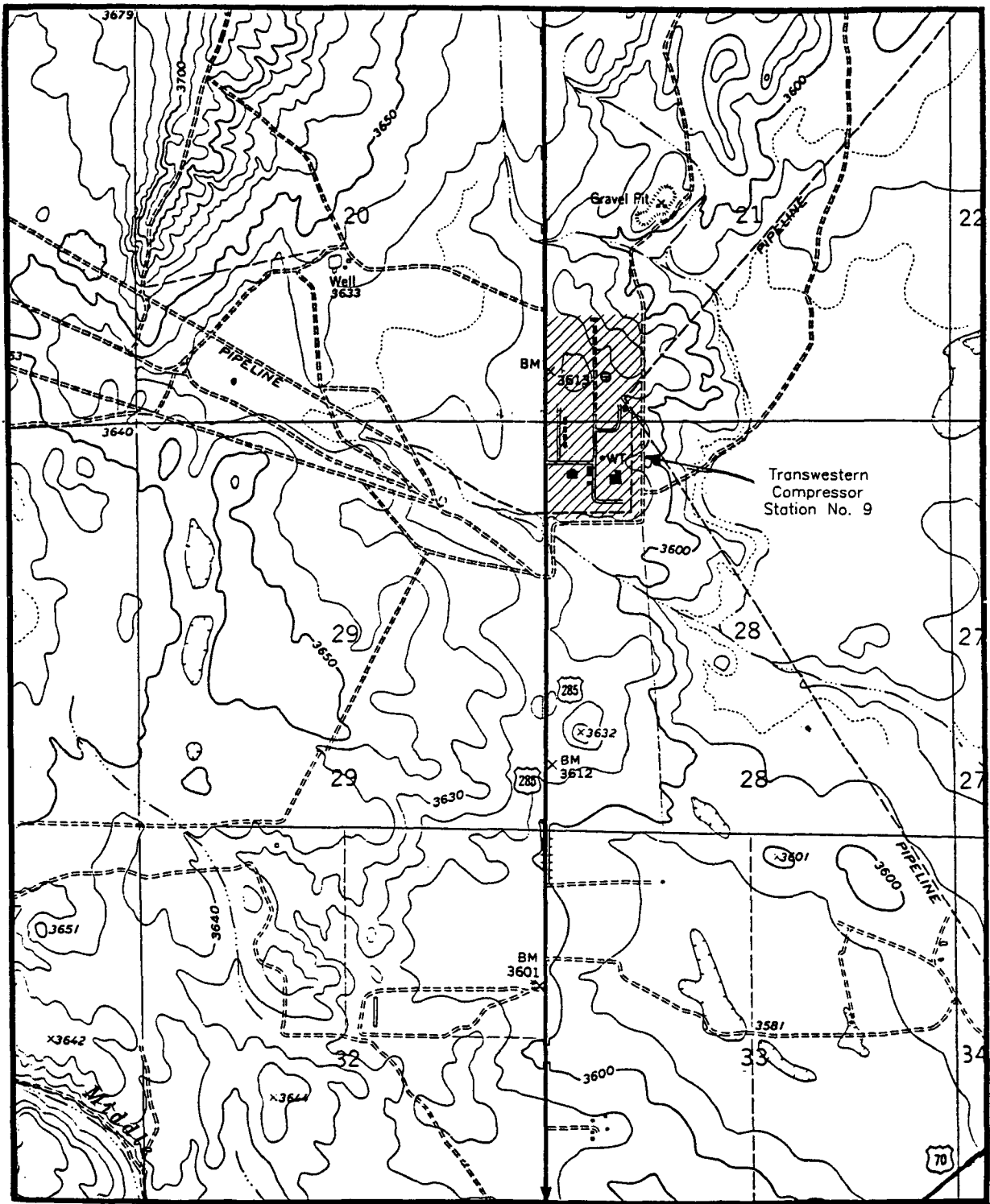
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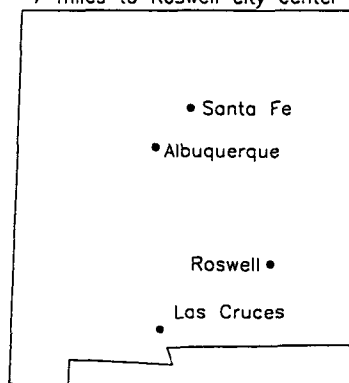
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FIGURES

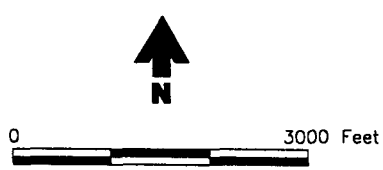


7 miles to Roswell city center



Source: U.S. Geological Survey, 1982
Panther Hill, Roswell North
7 1/2 Minute Topographic
Quadrangle Map.

ROSWELL COMPRESSOR STATION Location Map



DANIEL B. STEPHENS & ASSOCIATES, INC.
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Figure 1-1

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