HIP - 43

PERMITS, RENEWALS, & MODS

OIL CONSERVATION DIVISION
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8/8/83

MEMO

To: File

From: Kms

Subject EPA - General permit - Natural Gas Transmission Lines - Pipeline Hydrostatic Test Discharges (PHTD)

I spoke to Oscar Cabra EPA concerning the status of EPA's General permit re PHTD. EID and OCD has submitted negative comments on the permit. Cabra says based on N.M.'s comments, EPA has decided not to include NM in this general permit. The person at EPA/Washington handling general permits is: Michelle Hiller
202-426-4793

Date 3/23/95

To Roger Anderson

Building/Room NM OCD

☐ For Your Attention	☐ For Your Recommendation
☒ For Your Information	☐ For Your Approval
☐ Please Comment	☐ Please Return
☐ Please See Me	☐ Please File
☐ Please Handle	☐ Please Mail
☐ Approved	☐ As Requested

☐ **Telephone Call:** Number _____ Time Called _____

MESSAGE After our phone conversation on the hydrostatic test discharge permit being considered by EPA I looked up our file on the previous proposal in 1988 I'm sure so many things have changed since then but I thought you might like a copy of some of what I found.

From Glenn Spamer

Building/Room NMED - SWQB

ADM 030 Issued 7/93

[redacted] EPA

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

May 13, 1983

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Attention: Mr. Robert Honneschlorger
Chief, Permits Branch, GW-P

Dear Sir:

Enclosed with this cover letter are the Oil Conservation Division's (OCD) and the Environmental Improvement Division (EID) Water Pollution Bureau technical comments and concerns on the National Pollutant Discharge Elimination System (NPDES) draft general permit for Natural Gas Transmission Pipeline Hydrostatic Test Discharges (PHTD).

The OCD strongly recommends that EPA not proceed with the issuing of a general NPDES permit for Natural Gas Transmission Pipeline Hydrostatic Test Discharges. Site specific conditions cannot be taken into account under this system and New Mexico's surface and ground waters could be affected.

If you have any questions regarding this matter please contact me at (505) 827-5800 or Oscar Simpson, Water Resource Specialist, at (505) 827-5822.

Sincerely,

JOE D. RAMEY
Director

JDR/OS/fd
enc.

Oil Conservation Division
Comments on the Draft General Permit for Natural Gas
Transmission Pipeline Hydrostatic Test Discharge (PHTD)

I. The letter of April 5, 1983 from Robert E. Honneschlorger of EPA to Charles Nylander, EID, states that..."A review of the nature of effluents from these facilities indicates that they may be more appropriately controlled by a general permit because they involve the same types of wastewater, etc."

The information which the Oil Conservation Division has accumulated on PHTD's contradicts EPA's statement that all PHT discharges involve the same type of wastewater characteristics. The characteristics of PHTD wastewater are dependent upon:

1. The age of the segment of pipeline being tested. New segments of pipelines being tested that have not been in service will have entirely different wastewater characteristics than segments of pipelines that have been in service.

   New pipelines generally have wastewater characteristics that are controlled by factors such as, source water being used to provide the hydrostatic test, means of emptying the pipeline (driving force) of the water (natural gas or compressed air), type of pigs used and function of the pigging operations, the methodology each operator uses to conduct and perform the hydrostatic test, and successive use of hydrostatic test water.

   Common pollution sources associated with wastewater from new pipelines are high total suspended and/or settleable solids content, high iron content, and possible high chemical oxygen demand. Old pipelines have all the characteristics of new pipeline tests except old lines could have high concentrations of complex hydrocarbon mixtures.

2. The type of pigs used and the function of the pigging operation (cleaning, pushing, absorbing).

3. The composition or nature of the pipeline being tested (coated or uncoated pipe, welding material and its associated welding slag, other extraneous residual debris such as dirt and hydrocarbon residue from manufacturing processes.

4. Chemical composition of the natural gas

   New Mexico has generally two types of gas, sweet and sour. Each type of gas has varying amounts of condensates and liquids produced at the wellhead which may or may not be removed prior to transmission thereof.

5. Dehydration methods used for each particular test. Removal of residual test water from the pipeline tested may be done by a special pigging system combined with heated air or the use of methanol or glycol to absorb residual water.

6. Cleaning operations for pipelines (corrosion inhibitors and pickling acids)

   Cleaning is performed to remove debris, scale buildup, and residual liquids (hydrocarbon and/or water) which might interfere with the efficiency of transferring the natural gas.

7. Chemical quality of the water used to perform the hydrostatic tests.

The OCD's experience with PHTD indicates that the general NPDES draft permit for natural gas transmission PHTD would not effectively control wastewater discharges.

The OCD would like to review your data on these tests and the sources thereof which evidently indicated such a system would effectively work. In turn the OCD would gladly share its data with you or your technical staff.

The Oil Conservation Division currently has the following permit system for PHTD's of new pipelines only (pipelines which have not been placed in service):

1. a permit is issued for a period of one year from the date of issuance.

2. hydrostatic discharges are allowed up to the limit of 100,000 gallons for each site to be tested.

3. discharges over 100,000 gallons must have prior approval from the Division and dependent upon the specifics of the test, the discharger may be asked to submit a written program description of the intended sequence of events for testing and dewatering the pipeline, perform chemical analyses on their discharges and supply water used for the test, and make an impact statement as a result of their discharges. A 60-day or longer advance notice is suggested for these discharges.

4. Other conditions of the yearly permit are:

   1) A monthly report summarizing each month's activity of Hydrostatic Discharge as required by the preceding reporting requirements must be received within 45 days following the preceding month.

2) No discharges of hydrostatic test water will be made into any lake, perennial stream, or river or their respective immediate tributaries that may be seasonal.

3) Discharges of hydrostatic test water shall be from only newly constructed pipelines.

4) Only fresh water (10,000 ppm Total Dissolved Solids or better) shall be used for hydrostatic test water.

The yearly permit requests the following information to be submitted in a monthly report:

1) Type of Test

2) Location of Test - Section, Township, Range and County

3) Date of Test

4) Volume of Discharge

5) Source of Water used for testing. (Owner's name and location of the water source, Section, Township and Range)

The OCD's current policy on hydrostatic discharges from old or in-service pipelines is as follows:

1. Discharges are not allowed from old or in-service pipelines without prior approval.

2. Once discharge approval has been given all discharges shall be contained in impermeable storage where analytical evaluation can dictate treatment schemes and method and location of disposal.

3. A 60-day advance written notice is suggested that describes the sequence for testing, dewatering, impermeable storage facilities to be used, and methodology for analytical testing and treatment of the discharged hydrostatic waters.

The OCD is currently evaluating the potential adverse effects that might result from discharges of old or in-service natural gas transmission hydrostatic test discharges.

The evaluation is scheduled to occur over the next two years as follows:

1. Request industry to reply to a questionnaire on the

frequency, quantity, and quality of in-service hydrostatic test discharges over the last five years. (3 months)

2. Obtain representative samples of current in-service hydrostatic tests and analyze or characterize these samples. (1 year)

3. Based on the results of the first two steps, summarize results for:

   a) Summarize results and make recommendations for engineering solutions as to possible pretreatment and/or treatment schemes that would allow rapid non-degrading discharges near the test site. (1 year)

   b) Develop rapid inexpensive analytical methods for field use which will aid in characterizing these fluids so that disposal criteria and treatment methods can be implemented as rapidly as possible.

HEALTH ENVIRONMENT department

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Russell F. Rhoades, MPH, Director

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ROBERT L. LOVATO, A.P.A.
DEPUTY SECRETARY

JOSEPH F. JOHNSON
DEPUTY SECRETARY

May 12, 1983

Mr. Joe Ramey, Director
Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87503

Attention: Oscar Simpson

Dear Mr. Ramey,

Attached are the Water Pollution Control Bureau, Surface Water Section's comments on the National Pollutant Discharge Elimination System (NPDES) draft general permit for Natural Gas Transmission Pipeline Hydrostatic Test (PHT) Discharges. Review and comment on the draft permit was requested by EPA's Region VI office in Dallas. On April 13, 1983 Charles Nylander requested your Division take the "lead role" in reviewing this general type permit because of its relationship to natural gas transmission lines.

In general, the Surface Water Section has serious reservations with the concept of issuing a general NPDES permit for Natural Gas Transmission PHT Discharges for the following reasons:

1. A general permit does not take into consideration receiving water characteristics (ie., high quality coldwater fishery and domestic water supply designation).

2. The State would be required to certify a general permit before the permit can be issued to sources located in this state and would, therefore, have no "voice" if a source decides to discharge to a stream reach with a designated use of high-quality coldwater fishery. In addition, as the current draft permit is written, the new discharge would not even be required to notify the State under a general NPDES permit of its plans to conduct a PHT discharge.

3. The general permit does not adequately address the discharge effluent characteristics (contains no specific limitations - ie., page 2 of 13; Section A. 3 - oil sheen).

4. Self-monitoring records are submitted on a once per year basis. Site specific NPDES permits require submittal of quarterly monitoring reports. If the reports are submitted on a once per year basis, it may be a full thirteen months before the State or EPA is notified of noncompliance and the nature of that non-compliance.

5. The permit requires only fourteen (14) days notification (to EPA) of commencement of operations by operators who initiate discharge after the effective date of the permit.

6. The permit allows bypassing if the combined discharges do not exceed the effluent limitations. However, the draft permit contains no effluent limitations.

7. Based on discussions with technical staff of our Ground Water Section, it appears EPA's assumption that PHT discharges "involve the same types of wastewater, etc." is incorrect.

8. A review of the data and information which the Ground Water Section has available in their files concerning PHT discharges indicates that these discharges may adversely impact ground water.

Again, the Surface Water Section recommends cautious consideration be given to this draft general permit. In certifying NPDES permits, the State attests to the fact that the conditions of the "permit will be conducted in a manner which will not violate applicable water quality standards" and will comply with "appropriate requirements of State law;" therefore, the impacts of these discharges on the receiving surface water as well as on ground water should be given the utmost priority.

Please fell free to contact me if you have any questions.

Sincerely,

Kathleen M. Sisneros
Environmental Scientist
Surface Water Section

KMS:gl

xc: Devon Jercinovic, EID Ground Water
Charles Nylander, WPCB, Chief