

GW - 303

INSPECTION

(Drain-lines, Sump, BGT, Site, etc.)

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 14, 2009 11:09 AM
To: 'bhebert@eprod.com'
Cc: Seale, Runell; 'Fernald, Donald'; Powell, Brandon, EMNRD
Subject: GW-303, Inspection Response (Navajo City CS)

Ms. Hebert,

The OCD appreciates Enterprises efforts in resolving these inspections findings at the Navajo City Compressor Station.

These findings are still considered OPEN until integrity tests are completed and resolved on the two Below-Grade tanks.

Enterprise shall provide a status update of integrity test by **September 25, 2009**. Unless all final results are completed and submitted to the OCD.

Thank you for your attention.

llowe

Leonard Lowe

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



Enterprise Products™

August 6, 2009

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLP GP, INC., SOLE MANAGER

Certified Mail
7008 3230 0002 4472 9461

Mr. Glenn von Gonten, Acting Environmental Bureau Chief
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 St. Frances Drive
Santa Fe, NM 87505

RECEIVED OGD
2009 AUG 12 A 11:25

**Re: Enterprise Field Services, LLC
Navajo City Compressor Station -GW-303
SW/4, NW/4, Section 33, Township 30 North, Range 7 West, NMPM
San Juan County, NM**

Dear Mr. von Gonten:

Enterprise Field Services, LLC (Enterprise) is submitting this letter in response to the site inspection conducted at the Navajo City Compressor Station on June 10, 2009, and items listed in Number 16 of the Discharge Permit approval conditions.

1. Below Grade Tanks (BGTs) are currently being inspected on a monthly basis. A copy of the latest inspection is included in attachment A.
2. Samples of fluids from the secondary containment leak detection systems were obtained on July 23, 2009, results are included in attachment B. Analysis indicates the presence of hydrocarbons. Enterprise is making plans to remove these liquids and conduct integrity testing of both tanks. The results of the testing will be submitted to the NMOCD.

If you have questions or require additional information, please contact Don Fernald, Environmental Scientist at (505) 599-2141 or me directly at (713) 381-6518.

Yours truly,

Mary E. Hebert
Director, Environmental Compliance

/sjn
attachments

cc: Joe Velasquez, Enterprise
Ralph Morris, Enterprise
Runell Seale, Enterprise
Bennie Armenta, Enterprise
Randy Baysinger, Enterprise
Leo Francisco, Enterprise

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.epplp.com

Attachment A
Monthly SPCC Inspection / Discharge Plan Inspection

Navajo City Compressor Station

2025 Haysak City Park Inspection Report Pg 26

Attachment B
Analytical Data from Testing Liquids in BGT inspection ports



COVER LETTER

Wednesday, August 05, 2009

Tami Ross
Souder, Miller and Associates
612 E Murray Dr.
Farmington, NM 87401
TEL: (505) 325-5667
FAX (505) 327-1496

RE: EPCO/ Navajo City CS

Order No.: 0907501

Dear Tami Ross:

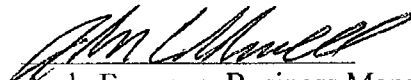
Hall Environmental Analysis Laboratory, Inc. received 2 sample(s) on 7/28/2009 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,


Andy Freeman, Business Manager
for Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX



Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-09

CLIENT: Souder, Miller and Associates
Lab Order: 0907501
Project: EPCO/ Navajo City CS
Lab ID: 0907501-01

Client Sample ID: T-307 Interstitial
Collection Date: 7/23/2009 3:35:00 PM
Date Received: 7/28/2009
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260: VOLATILES SHORT LIST						Analyst: HL
Benzene	64000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Toluene	490000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Ethylbenzene	61000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Xylenes, Total	700000	100000		µg/L	50000	8/3/2009 3:13:02 PM
Surr: 1,2-Dichloroethane-d4	107	59.3-133		%REC	50000	8/3/2009 3:13:02 PM
Surr: 4-Bromofluorobenzene	96.7	80.4-119		%REC	50000	8/3/2009 3:13:02 PM
Surr: Dibromofluoromethane	104	59.5-134		%REC	50000	8/3/2009 3:13:02 PM
Surr: Toluene-d8	109	53.5-136		%REC	50000	8/3/2009 3:13:02 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: MMS
Total Dissolved Solids	5900	400		mg/L	1	7/31/2009

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-09

CLIENT: Souder, Miller and Associates
Lab Order: 0907501
Project: EPCO/ Navajo City CS
Lab ID: 0907501-02

Client Sample ID: T-307 Inner Tank
Collection Date: 7/23/2009 3:35:00 PM
Date Received: 7/28/2009
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260: VOLATILES SHORT LIST						Analyst: HL
Benzene	11000	1000		µg/L	1000	8/3/2009 2:13:37 PM
Toluene	140000	20000		µg/L	20000	8/3/2009 1:44:39 PM
Ethylbenzene	94000	1000		µg/L	1000	8/3/2009 2:13:37 PM
Xylenes, Total	2100000	40000		µg/L	20000	8/3/2009 1:44:39 PM
Surr: 1,2-Dichloroethane-d4	110	59.3-133		%REC	1000	8/3/2009 2:13:37 PM
Surr: 4-Bromofluorobenzene	92.5	80.4-119		%REC	20000	8/3/2009 1:44:39 PM
Surr: Dibromofluoromethane	115	59.5-134		%REC	1000	8/3/2009 2:13:37 PM
Surr: Toluene-d8	105	53.5-136		%REC	1000	8/3/2009 2:13:37 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: MMS
Total Dissolved Solids	1980	400		mg/L	1	7/31/2009

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

QA/QC SUMMARY REPORT

Client: Souder, Miller and Associates

Project: EPCO/ Navajo City CS

Work Order: 0907501

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260: Volatiles Short List									
Sample ID: 5ml rb		MBLK							
					Batch ID: R34729		Analysis Date:		7/30/2009 9:09:14 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: b6		MBLK							
					Batch ID: R34729		Analysis Date:		7/30/2009 10:08:27 PM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 5ml rb		MBLK							
					Batch ID: R34748		Analysis Date:		7/31/2009 10:52:41 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 5ml rb		MBLK							
					Batch ID: R34755		Analysis Date:		8/3/2009 8:51:09 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 100ng lcs		LCS							
					Batch ID: R34729		Analysis Date:		7/30/2009 10:06:58 AM
Benzene	20.49	µg/L	1.0	102	86.8	120			
Toluene	19.55	µg/L	1.0	97.7	64.1	127			
Sample ID: 100ng lcs_b		LCS							
					Batch ID: R34729		Analysis Date:		7/30/2009 11:06:02 PM
Benzene	20.04	µg/L	1.0	100	86.8	120			
Toluene	18.41	µg/L	1.0	91.0	64.1	127			
Sample ID: 100ng lcs_b		LCS							
					Batch ID: R34748		Analysis Date:		7/31/2009 1:26:36 PM
Benzene	19.44	µg/L	1.0	97.2	86.8	120			
Toluene	18.75	µg/L	1.0	92.9	64.1	127			
Sample ID: 100ng lcs		LCS							
					Batch ID: R34755		Analysis Date:		8/3/2009 10:17:53 AM
Benzene	21.68	µg/L	1.0	108	86.8	120			
Toluene	18.51	µg/L	1.0	92.6	64.1	127			

Method: SM2540C MOD: Total Dissolved Solids

Sample ID: MB-19754 MBLK

Batch ID: 19754 Analysis Date: 7/31/2009

Total Dissolved Solids ND mg/L 20.0

Sample ID: LCS-19754 LCS

Batch ID: 19754 Analysis Date: 7/31/2009

Total Dissolved Solids 1002 mg/L 20.0 100 80 120

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
R	RPD outside accepted recovery limits	S	Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name **SMA-FARM**

Date Received:

7/28/2009

Work Order Number **0907501**

Received by: **ARS**

Checklist completed by:

Signature

Sample ID labels checked by:

Initials

7/28/09
Date

Matrix:

Carrier name: Greyhound

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on shipping container/cooler?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/> Not Shipped <input type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Water - VOA vials have zero headspace?	No VOA vials submitted <input type="checkbox"/>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Water - Preservation labels on bottle and cap match?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Water - pH acceptable upon receipt?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

Number of preserved bottles checked for pH:

<2 >12 unless noted below.

3.1°

<6° C Acceptable

If given sufficient time to cool.

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

1

Received by:

Bill To E.P.CO.

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Inspection noted in latest permit.

16. OCD Inspections: The OCD performed an inspection of this facility on June 9, 2009. Mr. Clay Roesler and Ms. Runell Seale witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following: *SEE "PERMITS" FOR PHOTOGRAPHS*

1. **Photo 1:** BGT (T302) had no fluids within the leak detection system. Owner/Operator is reminded that all leak detection systems shall be monitored and recorded on a monthly basis. See Condition 11 for details.
2. **Photo 2 & 3:** Both BGT (T306) and BGT (T307) indicated fluids within its leak detection system. Owner/Operator shall investigate the reason for fluids in the leak detection system and if need be verify tank integrity. The owner/operator shall monitor and keep record of these leak detection systems on a monthly basis. See Condition 11 for details.

The Owner/operator shall resolve **item 2 by August 10, 2009**, and submit their findings to the OCD for review.