4R - 002

GENERAL CORRESPONDENCE

YEAR(S):
1993-1991

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

January 22, 1993

Roger

Ms. Donna Mullins
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Ms. Mullins:

This responds to your letter dated December 19, 1992, requesting the U.S. Fish and Wildlife Service (Service) comments on the U.S. Environmental Protection Agency's (EPA) intent to terminate the Consent Decree between the Transwestern Pipeline Company (TPC) and EPA for PCB contamination at four TPC compressor stations and ancillary sites in New Mexico. The Consent Decree will be terminated because the company has met the terms and conditions of the document. The company has cleaned up PCB soil contamination at their Mountainair, Corona, Thoreau, and Laguna stations. Groundwater monitoring has also been conducted at these four compressor stations in accordance with the Consent Decree.

PCB's and BTEX were found in the groundwater at the Thoreau and Laguna stations. New Mexico Oil Conservation Division (OCD) has agreed to oversee TPC's groundwater remedial efforts at these two stations to ensure that groundwaters are remediated to State standards. OCD is in the process of working with TPC to define the extent of petroleum contaminants at these sites and to determine options for remediation of contaminated groundwater.

The Service has no comment on the termination of the Consent Decree for PCB remedial activities at the TPC sites. In a conversation with Mr. William Olsen of OCD, groundwater remediation plans at the Thoreau and Laguna stations at this time are based on a closed loop plan. However, if at anytime these plans change and involve open ponding, which may create a potential risk to the Department of Interior Trust Resources, the Service recommends steps be taken to ensure migratory birds cannot gain access to the ponds.

DANIEL B. STEPHENS & ASSOCIATES, INC.
ENVIRONMENTAL SCIENTISTS AND ENGINEERS

OIL CONSERVATION DIVISION
RECEIVED
'93 JAN 13 AM 8 50

January 11, 1993

0026-9039-93

Mr. Bill Olson
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Olson:

We have completed monitoring activities at the Belen Compressor Station, and at this time would like to discharge all purge water from the site. The water was monitored for benzene, toluene, ethylbenzene, and xylene (BTEX) and polychlorinated biphenyls (PCBs). None of these constituents were detected at concentrations above New Mexico Water Quality Control Commission (NMWQCC) ground-water standards. Results of all water quality analyses from the site are enclosed.

There are approximately 300 gallons of purge water on-site stored in seven 55-gallon drums. We would like to discharge this water as soon as possible.

Please call me at 822-9400 if you have any questions.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

Joanne Hilton

Joanne Hilton
Project Manager

cc: George Robinson

Verbal OK
1/15/93 0845 hrs.

9039\OLSON.111

SUMMARY OF ANALYTICAL RESULTS
BELEN MONITOR WELLS

MONITOR WELL NO.	DATE M/D/Y	LAB	CONCENTRATION (µg/l) PCB*	Benzene	Toluene	Ethyl-benzene	Xylene
Reporting Limit			0.5/1.0**	0.5	0.5	0.5	0.5
BMW-L1	08/19/92	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	ND
	06/17/92[R]	ATI	ND	ND	ND	ND	ND
	04/21/92	ATI	ND	ND	ND	ND	ND
	04/21/92[R]	ATI	ND	ND	ND	ND	ND
	02/03/92	RMAL	ND	ND	ND	ND	ND
	12/03/91	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	2.4	ND	ND
BMW-L2	08/19/92	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	ND
	04/21/92	ATI	ND	ND	ND	ND	ND
	02/03/92	RMAL	ND	ND	ND	ND	ND
	12/03/91	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	ND	ND	ND
BMW-L3	08/19/92	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	ND
	04/21/92	ATI	ND	ND	ND	ND	ND
	02/03/92	RMAL	ND	ND	ND	ND	ND
	02/03/92[FR]	RMAL	ND	ND	ND	ND	ND
	12/03/91	RMAL	ND	ND	ND	ND	ND
	12/03/91[FR]	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	1.2	ND	ND

* Total PCB includes Aroclors 1016, 1221, 1242, 1248, 1254, and 1260
** Reporting Limit is either 0.5 µg/l or 1.0 µg/l, depending on the Aroclor and date of analysis.
ND Not detected at the reporting limit indicated
R Replicate sample
FR Fictitious replicate sample (all fictitious replicate samples are labeled BMW-99 in Appendix C)
ATI Analytical Technologies, Inc.
RMAL Enseco Rocky Mountain Analytical Laboratory

SUMMARY OF ANALYTICAL RESULTS
BELEN MONITOR WELLS

MONITOR WELL NO.	DATE M/D/Y	LAB	CONCENTRATION (µg/l) PCB*	Benzene	Toluene	Ethyl-benzene	Xylene
Reporting Limit			0.5/1.0**	0.5	0.5	0.5	0.5
BMW-R4	08/19/92	ATI	ND	ND	ND	ND	ND
	08/19/92[FR]	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	3.9
	04/21/92	ATI	ND	ND	ND	ND	ND
	02/03/92	RMAL	ND	ND	ND	ND	ND
	12/03/91	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	ND	ND	ND
BMW-R5	08/19/92	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	ND
	04/21/92	ATI	ND	ND	ND	ND	ND
	02/04/92	RMAL	ND	ND	ND	ND	ND
	12/04/91	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	ND	ND	ND
BMW-R6	08/19/92	ATI	ND	ND	ND	ND	ND
	06/17/92	ATI	ND	ND	ND	ND	ND
	04/21/92	ATI	ND	ND	ND	ND	ND
	02/04/92	RMAL	ND	ND	ND	ND	ND
	12/04/91	RMAL	ND	ND	ND	ND	ND
	10/07/91	RMAL	ND	ND	ND	ND	ND
	10/07/91[R]	RMAL	ND	ND	ND	ND	ND

* Total PCB includes Aroclors 1016, 1221, 1242, 1248, 1254, and 1260
** Reporting Limit is either 0.5 µg/l or 1.0 µg/l, depending on the Aroclor and date of analysis.
ND Not detected at the reporting limit indicated
R Replicate sample
FR Fictitious replicate sample (all fictitious replicate samples are labeled BMW-99 in Appendix C)
ATI Analytical Technologies, Inc.
RMAL Enseco Rocky Mountain Analytical Laboratory

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

December 29, 1992

Donna S. Mullins
U.S. Environmental Protection Agency
Region 6
1445 Ross Ave, Suite 1200
Dallas, Texas 75202-2733

RE: TRANSWESTERN PIPELINE COMPANY PCB CONTAMINANT CLEANUP

Dear Ms. Mullins:

The New Mexico Oil Conservation Division (OCD) is in receipt of your December 17, 1992 correspondence requesting comment on the U.S. Environmental Protection Agency's (EPA) intent to terminate the Consent Decree between the Transwestern Pipeline Company (TPC) and EPA for PCB contamination at various TPC compressor stations and ancillary sites in New Mexico. Your correspondence states that the required cleanup of PCB's at these sites has been completed to the satisfaction of EPA and that petroleum related contaminants identified during ground water monitoring at the Thoreau and Laguna compressor stations are being addressed by the appropriate state and tribal regulatory agencies.

The OCD has no comment on the termination of the Consent Decree for PCB remedial activities at the TPC sites. However, according to New Mexico Water Quality Control Commission (WQCC) Regulations, remaining petroleum contaminated ground water at the Thoreau and Laguna compressor stations is required to be remediated to ground water standards promulgated by the WQCC. The OCD is the constituent agency responsible for enforcement of WQCC regulations at these stations. As you know, the OCD and has been working with TPC to define the extent of petroleum contaminants at these sites and to determine options for remediation of contaminated ground water. The OCD will continue to oversee TPC's ground water remedial efforts to ensure that ground waters are remediated to state standards.

The OCD thanks EPA for keeping us apprised of the results of EPA's PCB contaminant investigations and remedial efforts at TPC's New Mexico sites.

In the future, if you have any questions regarding OCD required remedial actions at TPC's Thoreau and Laguna compressor stations, please contact William C. Olson of my staff at (505) 827-5885.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: William J. LeMay, OCD Director
Frank Chavez, OCD Aztec District Supervisor

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DEC 17 1992

William J. LeMay
Director
Oil Conservation Division
State of New Mexico
Energy, Minerals and Natural Resources Department
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. LeMay:

As you are aware, the EPA PCB Program has been working with Transwestern Pipeline, under the auspices of a Consent Decree, for the cleanup of PCB contamination at four compressor stations and ancillary sites in New Mexico. As of this date, cleanup has been completed at the four compressor stations and ancillary sites according to the terms of the Consent Decree. Groundwater monitoring has also been conducted at the four compressor stations in accordance with the Consent Decree. PCB, in addition to Benzene, Toluene and Xylene (BTEX), contamination has been identified at the Thoreau and Laguna Compressor Stations. According to the terms of the Consent Decree, the company has submitted Groundwater Assessment Reports for both sites that have been approved by the EPA PCB Program. The Company has proposed and is conducting on-going groundwater monitoring at both of these sites.

The company has also conducted groundwater monitoring at the Belen Rio Grande River Crossing for a one year period. No PCBs or BTEX were detected at this site.

The purpose of this letter is two-fold. First, current on-going groundwater monitoring and/or remediation is not covered under the Consent Decree. Currently, the company is working with your Agency and the Navajo Tribe on on-going groundwater monitoring at the Thoreau Compressor Station. They are also conducting a pilot bioremediation program for hydrocarbon contamination, that has been approved by your Agency, at the site. The company is working with your Agency and the Laguna Tribe concerning on-going groundwater monitoring at the Laguna Compressor Station. Therefore, based on the lack of resources and the priority of other projects, the EPA PCB Program will no longer formally conduct oversight of on-going groundwater monitoring, as it pertains to PCB contamination. The EPA PCB Program reserves the right to enter into a formal oversight role, but this would have to be through the civil referral process or civil administrative complaint process.

Second, the EPA PCB Program will soon terminate the Consent Decree because the Company has met the terms and conditions of the Consent Decree. Before we terminate the Consent Decree, we want to give

interested parties a period of 30 days in which to comment or ask questions about the outcome of the cleanup. Please send in writing or call about any questions or comments that you might have by January 25, 1993.

Finally, we want to thank you for your assistance in this project. Your interest and assistance contributed to a project which resulted in the overall cleanup of the environment.

If you have any questions or comments concerning this letter or the Consent Decree, please call me at (214) 655-7576.

Sincerely,

Donna S. Mullins

Donna S. Mullins
EPA Project Contact

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

October 27, 1992

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Belen Rio Grande River Crossing

Dear Ms. Mullins,

I have enclosed a copy of the final report on ground water monitoring at the Belen Rio Grande River Crossing. This information completes all documentation requested by your office.

If additional information would assist and expedite a written certification that all requirements of the Consent Decree have been met, please call me at (713) 646-7327.

Sincerely,

George C. Robinson, P.E.
Environmental Affairs

cc: Mr. James C. Alexander
Mr. Thomas H McGraw, New Mexico EID
Mr. Roger Anderson, New Mexico OCD
Ms. Jennifer Fowler-Propst, Fish and Wildlife Service

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

October 21, 1991

Ms. Jennifer Fowler-Propst
Field Supervisor
Ecological Services
Fish and Wildlife Service
U.S. Department of the Interior
3530 Pan American Highway, N.E., Suite D,
Albuquerque, New Mexico 87107

Re: Ground Water Monitoring, Rio Grande Pipeline Crossing, U.S. District Court, New Mexico District Consent Decree, U.S.EPA & Transwestern Pipeline

Dear Ms. Fowler-Propst:

This letter is in response to your letter of September 19, 1991 and confirms much of my discussions with Ms. Shomo referred to in your letter. We have offered to meet with you and other interested parties in the Fish and Wildlife Service to provide you with information on the history, condition and operation of the sites and our plans for the future. It is our hope that we may yet have the opportunity of meeting with you to discuss this matter which is of significant concern to us. In the meantime, this letter provides summary information and indicates our position on ground water monitoring at the sites.

Your letter discusses several points: (1) characterization of the sites; (2) Transwestern's proposed remedial action under the Consent Decree; (3) the hazard risk imposed by the sites; (4) a description of the requirements, prohibitions and interpretations of the Endangered Species Act and The Migratory Bird Treaty Act; and (5) your request for additional ground water monitoring. We are pleased to provide the following information about our operations and to respond to these points in order.

Background

During operation, gas pipelines accumulate material (scale) on inner pipe surfaces and condensed liquids (condensate) in the line. They are predominantly composed of materials from vaporized natural liquids within the

gas when it is produced from the ground and small amounts of lubricants from crank case seal "blowby" (a necessity to safe pipeline operation). Water, benzene, toluene, ethylbenzene, and xylenes are the predominant constituents of natural produced condensate while PCBs, along with small amounts of other constituents of lubricating oils, were resultant from crank case seal blowby. PCBs and most parts of the crank case lubricants are relatively insoluble in water but are soluble in BTEX and, therefore, become a solute in the condensate.

Scale is controlled and condensate is removed through periodically passing a solid, cylindrical object (called a pig) through the line. This process is called pigging. During pigging operations, it is necessary to remove the pig before compressors or processing equipment and at other critical points, such as overhead river crossings, and replace it in the line "downstream" of these facilities. This results in the existence of the facilities at the Rio Grande river down river from the city of Belen.

Since the gas flows from East to West, the pigs are received and removed at the site on the east side of the river (the Receiver Site) and carried to the site on the west side of the river (the Launcher Site) where they are launched. Any site contamination would result from spillage of the condensate during pigging operations. Any contamination at the launcher site would have to be from drips off the pig or pig truck (both of which are now washed before removing from the Receiver Site) or tracked in by the truck tires or thew boots of the pigging crew. This occurance is discussed more fully in our letter of September 3, 1991, to Ms. Donna Mullins, a copy of which is included as Attachment A to this letter.

At the Receiver Site, small quantities of condensate do result from pigging operations. However, both the Receiver Site equipment and operations are designed to reduce the quantity and contain the residual. Through a series of pipes and operations the condensate is passed through a liquid separator (demister) and into a secure storage tank until the pig is quite close to the receiver door. After the door is opened the small remaining amount is spilled onto a containment slab, which drains it into a sump, from which it is then pumped to the secure storage tank. The procedure is described in more detail in the attached page from the "Operating Procedures", which we submitted to EPA on September 11, 1990. This page is included in this letter as Attachment B. Prior to installation of the present system, it is possible that spillage may have been larger although pigging was less frequent and condensate was always valued as "natural gasoline". In answering some questions for EPA, a description of past operations and changes in operations along with a measure of quantities and concentration was provided in our letter of August 27, 1991. A copy of this letter is included herein as Attachment C to this letter.

Site Characterization

In characterizing the sites in your letter, you write that both sites, ".... are contaminated with polychlorinated biphenyls (PCBs) and that recent analyses indicate some areas with PCB levels of 25 parts per million (ppm) at the surface and 7.3 ppm at a depth of 4 feet". This is an excellent example of why we would like to meet with you and present to you all of the available information on the site. There are no recent tests at 25 ppm or even 20 ppm at either of the sites. One of the early characterization tests at the Receiver Site showed over 25 ppm but two field tests at that location (one on the same sample) dispute this result and tests in two later investigations near this test indicated less than 1 ppm. At the Receiver Site, out of 274 tests, 270 tests indicated less than 10 ppm and over 200 tests did not detect any PCBs.

The sample result of 7.3 ppm at four feet which you referred to in your letter was at the Receiver Site and was the only one out of 45 tests below two and one half feet at the Receiver site which indicated any detectable PCBs, including eight others at four feet and nine below four feet (four in the saturated zone) which showed nothing.

At the Launcher site, 64 tests were performed for PCBs. Sixty tests did not detect any PCBs and only three indicated over 1 ppm. All three were located adjacent to the northern launcher pad. Two were taken at the same location in two different investigations and the other was only about 12 feet away. This pattern tends to confirm the conclusion drawn from operating procedures that any spills at this site would be the result of drips or tracking from handling the pigs.

Proposed Remedial Action

Although holding to its position that the sites pose no unreasonable risk to the environment, Transwestern has proposed an additional remedial action in consideration of EPA's expressed concern for transport of PCBs to and by the ground water. The site will be paved using Portland Cement Concrete except in areas of piping or other subsurface conditions which might require quick access. At those locations the site will be covered with asphaltic paving. This will eliminate the percolation of liquids and, thereby, eliminate any medium for transport of any material adsorbed or otherwise contained in the soils at the site. The pavement will, of course, also prevent the pathway of direct ingestion or aeolian transport.

Although the samples of soil in the saturated zone failed to indicate PCBs and the lack of apparent penetration below a maximum of four feet tends to indicate no contamination in the ground water, Transwestern has proposed to install monitor wells in accordance with the requirements of the Consent Decree. With the potential for future transport removed, it is anticipated that the installation of monitor wells will confirm that there is no existing ground water contamination.

Site Risk

We have been unable, so far, to locate the two references, which you cited, through a search of our library, the Houston Public Library, the libraries of the University of Houston or Rice University, or the libraries of two of our major consultants. However, although there are continuing questions as to the health hazard from PCBs, we believe that the real issue is not so much the toxicity or mutagenicity of the cited contaminants but, rather, the risk which is posed by these sites. A summary of our position on this issue, without any remedial action, was contained in our letter to EPA on August 23, 1991. A copy of that letter is included herein as Attachment D to this letter. With the addition of the cap (paving) to stop carrier transport and the monitoring to confirm that PCBs are not being transported in the ground water, we believe the site poses minimal risk.

Relative to PCBs, the comparison of this site with the allowable application of sludge containing 10 ppm PCBs on agricultural land by 40 CFR 257 would indicate that the potential risk posed by this site is significantly below that of the surrounding crop lands.

Relative to BTEX and PAHs, considering the procedures for control now being followed (since the early 1980s) and with the cap in place, the risk posed by the site appears very low, certainly below that of upstream fuel spills such as diesel and effluent from sewage treatment plants which likely contain residuals from many human products such as shampoos containing coal tars (a common source of PAHs).

Cited Laws

In your letter you cited sections of the Endangered Species Act of 1973 and the Migratory Bird Treaty Act and discussed the interpretations and actions of courts in enforcing penalties under these. Transwestern has no intention of knowingly contributing to any degradation of any Endangered Species or Migratory Birds; in fact we spend considerable sums in our construction procedures to mitigate or avoid impacts. Further we are active through our parent company in supporting private organizations who work to protect these flora and fauna. In addition, we have reviewed these acts and our activities with our attorneys and find no reason to believe that we have unknowingly committed any violations; in fact many of our major expenditures for some time and continuing are for activities to clean up the environment to make it safer for all.

Request For Additional Monitoring

In your letter you requested that we include monitoring for BTEX and PAHs as well as for PCBs. For our own purpose, we had planned to test for BTEX prior to closing the wells for PCB monitoring. BTEX is the major constituent

(other than water) in condensate. It is also the most mobile in soils and would be expected to be the best indicator of any transport of condensate. Therefore, we propose to add BTEX tests to the scheduled PCB monitoring already agreed to with EPA. If BTEX is found in the ground water, an assessment will be made of what further steps are necessary, including the possibility of additional monitoring and/or remediation. We believe that this will satisfy your expressed concerns and request.

We still think that it would be of value to meet with you and discuss our mutual concerns. To this end, we will be happy to come to Santa Fe for this meeting at a mutually convenient time. Please let me know when this would be convenient for you and others in The Service who might share your concerns. Meanwhile, should you have any questions, please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

Yours very truly,

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

cc: Ms. Donna Mullins, USEPA, Region VI
Mr. Thomas H. McGraw, New Mexico EID
Mr. John Pittenger, New Mexico Dept. of Game and Fish
Regional Director, U. S. Fish and Wildlife Service,
Mr. Dave Boyer, New Mexico OCD
Mr. Ed Wise, Entrix

ATTACHMENT A

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

September 3, 1991

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Reference: Rio Grande Pig Launcher Site

Dear Donna:

The purpose of this letter is to provide you with information on the operation procedures at the launcher site, to review data resultant from investigations at the site , and, based on these, characterize the site and assess risk. The intent is that, based on this new information, you will conclude,as we have, that this site poses no unreasonable risk and, therefore, needs no further remediation

No liquids are received at the launcher site. The procedures related to site use include the launching of pigs only. The pigs are received at the receiver site across the river. Both the pigs and the pig hauling truck are washed at the receiver site and then transported to the launcher site. Prior to establishing the present system in 1982, although the pigs and truck may not have been washed at the receiver site, no liquid was carried to the launcher site. Any condensate accidentally leaving the receiver site adhering to the pig or truck had significant time to evaporate between the receiver site and the launcher site.

With this type of operation (including that before 1982), any spillage at the launcher site would be no more than an occasional drip or material tracked from shoes or tires. This conclusion is supported by the extent and level of contamination measured in the explorations at the site. Other than one test at the back of the site at less than one half ppm, PCBs were detected in only three samples at two locations both immediately adjacent to the northern launcher site with the highest concentration of 16 ppm. A more detailed description of the condition is described in the subsequent paragraph.

In the initial investigation, the site was sampled on a grid pattern with spacings of 20 to 22 feet, which represents a closer spacing than many verification grids. The results of this investigation is shown in Attachment A, "Results of Initial Investigation" on the drawing, "Rio Grande Launcher Site, Surface (A) Sampling Sites And PCB Assay Values". Of the 24 tests taken, only two show any detection and only the one adjacent to the northern launcher shows greater than 1ppm (14.5 ppm).

In a subsequent request, you asked for two borings adjacent to each launcher at locations selected or agreed to by your Oversite Contractor. Samples were taken and tests performed at the surface, and at each two foot depth below, to a total depth of six feet. The results of these investigations are shown in Attachment B, "Results of Requested Follow Up Investigation" on the drawings titled "Rio Grande Launcher" where each drawing is subtitled with the depth of the test results shown. Of the 16 samples tested, only two detected any PCBs. These two, located at or within 10 feet of the only positive test result in the previous investigation, indicated only 16 ppm at the surface and 8.2 ppm at two feet.

In Summary:

- o No liquids were ever received at the site; therefore any contamination was limited to a very small quantity such as that resulting from a drip, or tracked from a shoe or a tire.
- o Pigs from receivers are now washed before entering the launcher site to further avoid contaminants entering site.
- o Test data is compatible with history of use and indicates levels less than two thirds of EPA standards for clean up of controlled access sites.

With the very low levels and small quantities of PCBs (with great affinity for fine grained soils), no indication of contamination at or near the groundwater, and no future receipt of condensate or PCBs at the site, we believe that the site does not pose an unreasonable risk. In the light of the information presented above, we request that EPA return the site to the standard requirements of the consent decree by rescinding its extraordinary cleanup requirements for this site.

Copies of this letter have been forwarded directly to Mr. Thomas H. McGraw at the New Mexico EID and to Mr. Ed Wise of ENTRIX.

Should you have any questions please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

Yours very truly

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

Enclosure

cc: Mr. Thomas H. McGraw, New Mexico EID
Mr. Ed Wise, ENTRIX
Mr. Dave Boyer, New Mexico OCD

ATTACHMENT B

There are two basic configurations of pig receiver facilities within the subject area; one at the Stations and at the Belen river crossing, and one at the end of the line loop about twenty miles downstream from each station. A description of the operating procedures and the configuration (to the degree that it affects operation) for each is provided in subsequent paragraphs.

Station and River Crossing Pig Receivers

As the pig approaches the receiver, the gas (along with any contained liquids) is being routed back to the mainline by a crossover a few feet upstream of the receiver. Up to this point there is no discharge of gas or liquids from the line.

When the pig passes this crossover point a valve is opened near the closed receiver port to allow the gas trapped between the receiver and the crossover to discharge to the nearby "de-mister" unit, where liquids are allowed to collect and gases are vented. This blowdown allows the pig to move forward to the crossover point quite close to the pig receiver door. The remaining liquid then moves through a drain at the bottom of the receiver to a sump located next to the receiver. Meanwhile the remaining small amount of gas is vented to the atmosphere by a vent at the top of the receiver.

The pig is then removed from the receiver and along with it a small quantity of liquid exits onto a concrete containment slab. The slab has a minimum six inch curb around it and is sloped to drain to a low point and thence to the previously mentioned sump. At the close of operations any remaining liquid is cleaned up and placed in the sump. A discussion of the operation of the sump and de-mister (sump tank) has been provided previously.

Loop End Pig Receivers

At the pig receivers at the end of the loop downstream from each station the configuration and, therefore, the procedure is somewhat different. At these locations the blowdown and drain (which go to the de-mister and sump at the station receivers) are connected through a closed piping system and a venturi device back into the mainline downstream. Therefore, in this receiver configuration there is no discharge line to a de-mister or sump and, therefore, no de-mister or sump.

As with the other configuration, when the port is opened to remove the pig, a small amount of liquid is discharged out the opening and onto the concrete containment slab. However, in this configuration with the drain rerouted back to the line there is no need for a sump. Instead a depressed area in the containment slab accumulates the liquid which is then cleaned up by hand, placed in sealed drums, labelled, and stored at the site. The waste is then picked up for transport to a permitted disposal facility along with the condensate from the storage tanks at the stations on a ninety day frequency.

ATTACHMENT C

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 27, 1991

Ms. Donna Mullins
USEPA, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75203

RE: REQUESTED HISTORIC DATA ON BELEN RECEIVER SITE OPERATION

Dear Donna:

In our meeting on August 26, 1991, you asked for information on the extent of the clean up of the condensate spill, which occurred in January of 1990. You also asked whether any fill had ever been placed at the site. In addition, you indicated that much of your concern was based on the unknown fate of condensate during the period from 1969 (beginning use of PCB lubricant in turbine at Corona) to 1981 (installation of the 500 barrel condensate tank at the receiver site) especially considering the quantity of condensate (7,935 gallons) measured during the period from November 1985 to February 1987. In connection with this you asked what was done with condensate from this site prior to installation of the present condensate storage tank. In subsequent paragraphs, this letter provides further information and answers to your questions.

In the clean up of the spill in January 1990, approximately 24 cubic yards of soil was removed from the site. This is calculated from the fact that the soil was removed in eighty-five 55 gallon drums. The area from which the material was removed is shown in the data which we have furnished you in the past on the sketch entitled "Surface Sample Location Sketch...", with the notation "GROUP 1" indicated in the top left corner. The area which was excavated was the "footprint" shaped area noted on the sketch as "Spill Area". The size of the excavation was determined visually since the condensate was still visible in the soil at the time of the cleanup. The area was excavated to a horizontal distance of 2 feet outside of any visual indication of condensate. The results of the testing for confirmation of depth of clean up was provided in the information previously furnished you.

During the time of this spill valve cleaning, as described in the operating procedures previously submitted to you, was underway. This provided the opportunity for tests to show significant variations in concentrations as small formerly "trapped" particles were broken loose and

passed through the line. However, it is noted that the tests on condensate from the receiver in January of 1990 show concentrations of 2 to 4 ppm. Therefore, the quantity of PCBs spilled in 100 gallons is well below the notification level for a spill.

The refilling of this excavation was one of only two times recollected by operations that fill was brought into the site; in this case to refill the excavation and in the other to construct a berm around the 500 barrel tank. Other than these, there has apparently been no other filling at the site.

In looking at operational history, it became obvious that the 7,935 gallons of "condensate" gathered from November 1985 to February 1987 should not be extrapolated to other times. The bases for this and several other significant pieces of information were collected in researching the history of condensate handling and pigging at the site.

The first and most significant item is the fact that, since sometime in 1982, the receiver site was used for pig truck washing and pig washing The water from this washing goes to the sump and is pumped to the 500 barrel tank. Operations estimates that over 95% of the volume in the tank is from equipment washing. Less than 5% of the materials collected in the tank are pipeline condensate.

Second, prior to 1982, pigging was scheduled for every two months but sometimes was not conducted since there were no dedicated pigging crews. In 1982, in order to expedite clean up in the line, personnel were assigned full time to pigging and the frequency was increased to once a month. Starting in 1985, the cleanup effort in the line was increased with continuous pigging being implemented. In addition valve cleaning, as described in the operating procedures, was being conducted. All these measures, which were implemented after the tank was in place, resulted in an increase in the liquids removed at this receiver.

Recent pigging, with increased liquids as described above, appears to result in volumes of from 1 to 15 gallons with an average of around 6, based on data collected in the field. Operations estimates that prior to the additional washing etc., normal pigging operations produced less than 5 gallons. With pigging frequency at once every two months in the period before the installation of the tank, the quantities collected would then have amounted to less than 30 gallons per year.

Finally, we have investigated the handling procedures and fate of the condensate prior to the existance of the tank. Operations indicates that the condensate was drained into a concrete sump and periodically pumped into drums for transport to the nearest station for handling with the condensate collected there.

We believe that the procedures and information disclosed in this investigation are compatible with the lack of existence of contamination beneath the receiver slags and the low level of contamination and very limited migration indicated by investigations at the site and that it supports the conclusion that the site does not pose an unusual threat to the environment.

We hope that this provides the information that you need immediately. We are searching our files for aerial photographs as you requested. Meanwhile, should you have any questions, please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634. Although we are both out of the office this week, we will check our messages frequently and get back to you expeditiously.

Yours very truly,

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

JCA:sb

cc: Mr. Thomas C. McGraw, New Mexico EID
Mr. Ed Wise, Entrix
Mr. Dave Boyer, New Mexico OCD

ALEXANDE:JCA7

ATTACHMENT D

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 23, 1991

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Reference: Dispute Resolution Under Consent Decree - Outline of Position, Clean up Levels at Rio Grande Pig Launcher and Receiver.

Dear Donna:

In a recent phone message you indicated that you were unsure of Transwestern Pipeline Company's (Transwestern's) position relative to the cleanup levels at the Belen Rio Grande River Crossing Pig Receiver and Launcher sites. The purpose of this letter is to provide further detail on Transwestern's position as stated in letter invoking dispute resolution on August 16, 1991.

As stated in the letter of August 16, Transwestern's position is that the more stringent criteria which you identified in your letter of July 23, 1991 constitute an unreasonably conservative requirement and that the site in its present condition does not represent "an unreasonable risk". In order to better define this position an outline of some of its bases is provided in the next paragraph. During the informal negotiations prior to litigation, it is our plan to review with you the details of these bases in the hope that your concerns may be dispelled.

The following points form a significant part of Transwestern's Position:

- o Changes in procedures and addition of equipment have removed the source of PCBs at the sites.
  The lubricant which contained the PCBs is no longer used. Present operating procedures and equipment, as described in our previous submittal to you, provide for containment and storage of all pipeline fluid which might contain PCBs.

- o Significant testing in five previous investigations has indicated that existing concentrations are small and migration, even before removal of the source, has been minimal.
  These data, which were provided to you previously, indicate that out of 74 tests of soils below 2 feet in depth, only two indicate any PCBs (0.13 ppm at 2.2 feet and 7.3ppm at 4 feet).

- o Tests of the soils at the apparent water level beneath the site do not indicate PCBs.
  Four samples were taken at 5 feet with water at 6 feet and later 4 samples were taken at 6 feet with none of them indicating the presence of PCBs.

- o The receiver site is not within the 100 year flood plain and river stages are controlled by drainage structures.

- o Site Access is controlled.
  The sites are fenced and locked. Their mechanical security is equal to the compressor stations.

- o The cited soil clean up level is below that which the US FDA allows in fillets of fish for human consumption.

- o The cited cleanup level, although indicted to be based on protection of surrounding agricultural lands, is significantly more stringent than the level which EPA has allowed in sludges for beneficial reuse on agricultural lands.

As previously mentioned, we look forward to discussing the above factors and others in greater detail during the informal negotiations. It is Transwestern's hope that the litigation step in the resolution procedure can be avoided.

We look forward to seeing you on Monday. Meanwhile, should you have any questions please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

Yours very truly

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

cc: Mr. Thomas H. McGraw, New Mexico EID
Mr. Ed Wise, ENTRIX
Mr. Dave Boyer, New Mexico OCD

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

September 17, 1991

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Reference: Dispute Resolution Under Consent Decree - Statement of Position and Offer of Alternate for Resolution Of Dispute

Dear Donna:

This letter confirms our verbal statement of position and offer of dispute settlement which we made in the meeting with you on yesterday.

As stated in our letter invoking dispute resolution, "Transwestern's position is that the cited more stringent criteria constitutes an unreasonably conservative requirement and that the site in its present condition does not represent "an unreasonable risk". In support of that position we have provided you with the following:

1. the results of five investigations at the receiver site;
2. a discussion of operating procedures at the receiver site;
3. a history of operations at the receiver site;
4. the results of two investigations at the launcher site;
5. a discussion of present and historic operations at the launcher site; and
6. a more detailed description of some of the bases of our position.

Additionally, valve and line cleaning procedures which we have implemented have resulted in decreasing the concentration of PCBs in the condensate in this section of the line significantly. In 21 tests of condensate since June, only one test result was 5ppm or greater (6.8 ppm) and the average is 3.3 ppm. We believe that all these data and information support our position that the sites do not provide an unreasonable risk and that no more stringent cleanup criteria is required than at other sites under the Consent Decree.

Our technical position in this matter remains unchanged. Additionally, Transwestern would like to accomplish timely completion of its activities under the Consent Decree. In the spirit of compromise and negotiated settlement, we have pursued a suggestion made by your oversight contractor during our last meeting; that of finding an alternative to a negotiated clean up level which would still satisfy your concerns.

As an alternative to negotiating a clean up standard and without prejudicing either of our positions, Transwestern proposes the following alternative solution:

1. Three monitor wells will be installed at the receiver site; one near the north-south center of the east end of the site and one west of each of the launchers along west side of the site;

2. Three monitor wells will be installed at the launcher site; one near the north-south center of the west end of the site and one east of each of the launchers along the east side of the site;

3. The wells will be monitored at monthly intervals with the first monitoring event being conducted immediately following well installation and developement. Monitoring and subsequent required activities will be in accord with the Consent Decree. However, since the Consent Decree allows monitoring to cease on completion of remediation activities (which are now complete), monitoring will be discontinued after six monitoring events provided no PCBs are found;

4. The receiver site will be paved over its entire surface area using Portland cement concrete in all areas except where future emergency or maintenance access to buried facilities is required. Those areas will be surfaced with asphaltic paving. The coverage of the pavement is shown on the attached drawing, "Operating Layout, ..., Pig Receivers".

5. The present earthen retainment dike around the condensate tank will be relaced by concrete retaining walls tied into the concrete slab.

6. Based on the recent information provided to you combined with previous test results, no further remediation or investigation other than the ground water monitoring (as described in 2. and 3., above) will be undertaken at the launcher site.

The monitor wells will allow evaluation of whether groundwater contamination exists. Although no evidence suggests the existence of secondary sources in the subsurface, the paved surface of the site will cut off any fluid driving force for movement through the vadose zone. Although very unlikely with present operating procedures, any spilled condensate would be below standards of concern and would be prevented from percolation through any unlikely sources in the subsurface below the site.

As discussed with you in the meeting, we believe that this alternative satisfies your concerns and, although expensive, is acceptable to Transwestern if it can result in a mutually satisfactory negotiated settlement of this problem.

Copies of this letter have been forwarded directly to Mr. Tom McGraw of the New Mexico EID and Mr. Ed Wise of Entrix.

We look forward to your early response to our offer so that we may implement activities to complete our responsibilities under the Consent Decree. In the meantime, should you have any questions please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

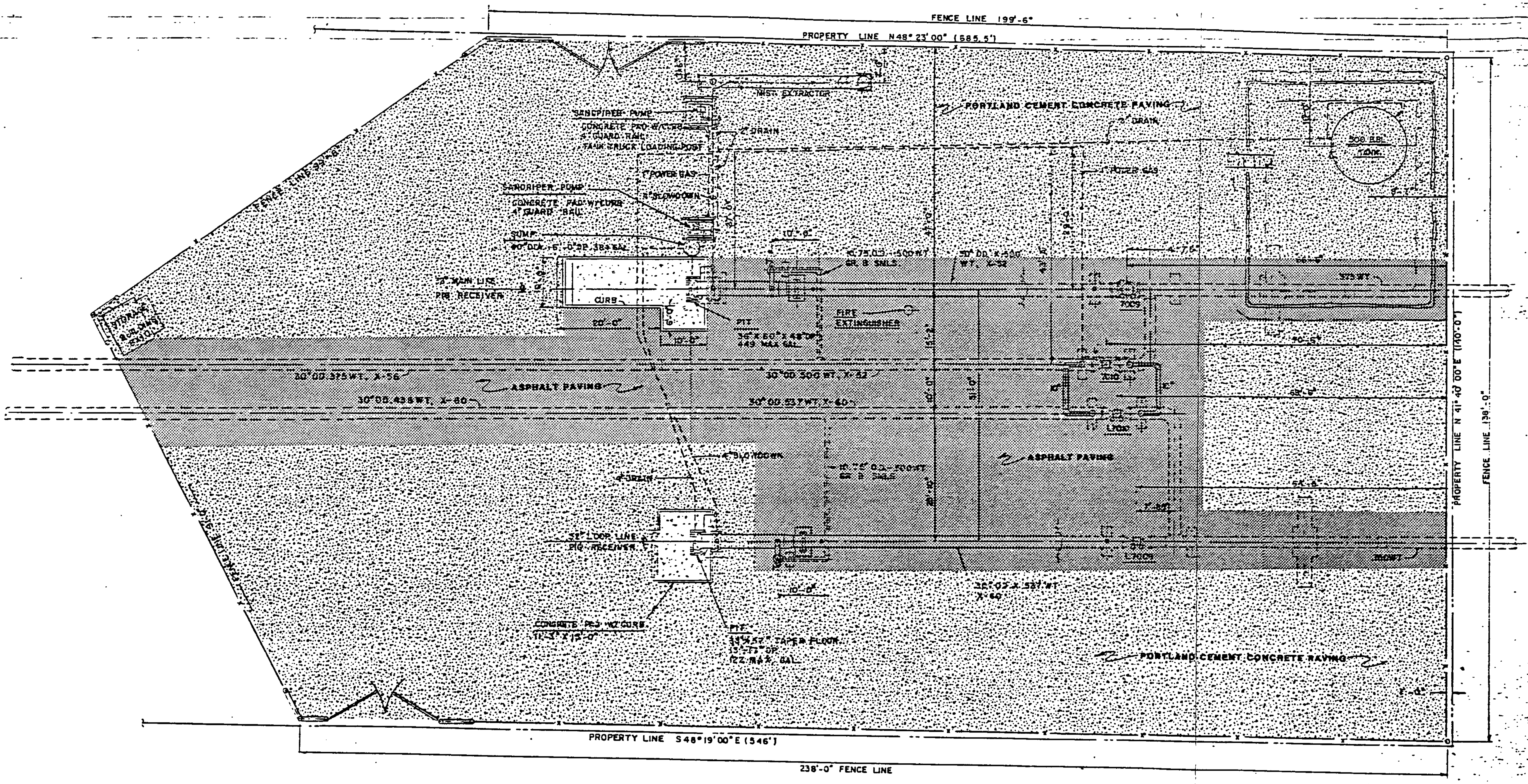
Yours very truly,

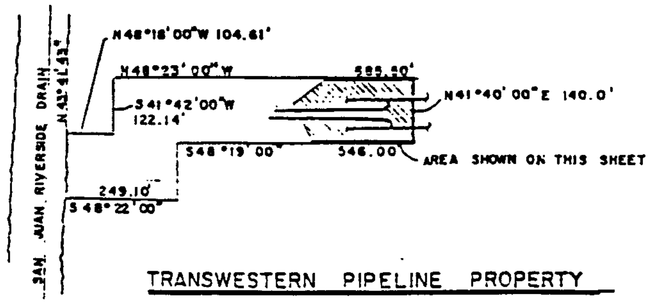
James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

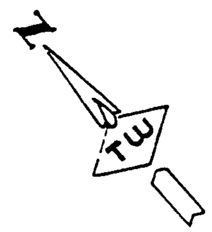
Attachment

cc: Mr. Thomas C. McGraw, New Mexico EID
Mr. Ed Wise, Entrix
Mr. Dave Boyer, New Mexico OCD





TRANSWESTERN PIPELINE PROPERTY



"NOT TO SCALE"

REV.	DATE	DESCRIPTION	DR. / CK.	APP
2	9-12-91	ADDITION OF PAVED AREAS W.O. 30002		
1	7-26-91	AS BUILT TO INCLUDE 1989 ADDITION		

DWG. NO.	DESCRIPTION
	REFERENCE DRAWINGS

TRANSWESTERN PIPELINE COMPANY

OPERATING LAYOUT
EAST SIDE RIO GRANDE RIVER CROSSING
PAVED AREAS

VALENCIA CO. NEW MEXICO

SCALE 1" = 10'-0"

DRAWN LEE 3-23-81

CHECKED

APPROVED

APPROVED

DRAWING NO. 25-L-8A

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 27, 1991

Ms. Donna Mullins
USEPA, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75203

RE: REQUESTED HISTORIC DATA ON BELEN RECEIVER SITE OPERATION

Dear Donna:

In our meeting on August 26, 1991, you asked for information on the extent of the clean up of the condensate spill, which occurred in January of 1990. You also asked whether any fill had ever been placed at the site. In addition, you indicated that much of your concern was based on the unknown fate of condensate during the period from 1969 (beginning use of PCB lubricant in turbine at Corona) to 1981 (installation of the 500 barrel condensate tank at the receiver site) especially considering the quantity of condensate (7,935 gallons) measured during the period from November 1985 to February 1987. In connection with this you asked what was done with condensate from this site prior to installation of the present condensate storage tank. In subsequent paragraphs, this letter provides further information and answers to your questions.

In the clean up of the spill in January 1990, approximately 24 cubic yards of soil was removed from the site. This is calculated from the fact that the soil was removed in eighty-five 55 gallon drums. The area from which the material was removed is shown in the data which we have furnished you in the past on the sketch entitled "Surface Sample Location Sketch...", with the notation "GROUP 1" indicated in the top left corner. The area which was excavated was the "footprint" shaped area noted on the sketch as "Spill Area". The size of the excavation was determined visually since the condensate was still visible in the soil at the time of the cleanup. The area was excavated to a horizontal distance of 2 feet outside of any visual indication of condensate. The results of the testing for confirmation of depth of clean up was provided in the information previously furnished you.

During the time of this spill valve cleaning, as described in the operating procedures previously submitted to you, was underway. This provided the opportunity for tests to show significant variations in concentrations as small formerly "trapped" particles were broken loose and

passed through the line. However, it is noted that the tests on condensate from the receiver in January of 1990 show concentrations of 2 to 4 ppm. Therefore, the quantity of PCBs spilled in 100 gallons is well below the notification level for a spill.

The refilling of this excavation was one of only two times recollected by operations that fill was brought into the site; in this case to refill the excavation and in the other to construct a berm around the 500 barrel tank. Other than these, there has apparently been no other filling at the site.

In looking at operational history, it became obvious that the 7,935 gallons of "condensate" gathered from November 1985 to February 1987 should not be extrapolated to other times. The bases for this and several other significant pieces of information were collected in researching the history of condensate handling and pigging at the site.

The first and most significant item is the fact that, since sometime in 1982, the receiver site was used for pig truck washing and pig washing The water from this washing goes to the sump and is pumped to the 500 barrel tank. Operations estimates that over 95% of the volume in the tank is from equipment washing. Less than 5% of the materials collected in the tank are pipeline condensate.

Second, prior to 1982, pigging was scheduled for every two months but sometimes was not conducted since there were no dedicated pigging crews. In 1982, in order to expedite clean up in the line, personnel were assigned full time to pigging and the frequency was increased to once a month. Starting in 1985, the cleanup effort in the line was increased with continuous pigging being implemented. In addition valve cleaning, as described in the operating procedures, was being conducted. All these measures, which were implemented after the tank was in place, resulted in an increase in the liquids removed at this receiver.

Recent pigging, with increased liquids as described above, appears to result in volumes of from 1 to 15 gallons with an average of around 6, based on data collected in the field. Operations estimates that prior to the additional washing etc., normal pigging operations produced less than 5 gallons. With pigging frequency at once every two months in the period before the installation of the tank, the quantities collected would then have amounted to less than 30 gallons per year.

Finally, we have investigated the handling procedures and fate of the condensate prior to the existance of the tank. Operations indicates that the condensate was drained into a concrete sump and periodically pumped into drums for transport to the nearest station for handling with the condensate collected there.

We believe that the procedures and information disclosed in this investigation are compatible with the lack of existence of contamination beneath the receiver slags and the low level of contamination and very limited migration indicated by investigations at the site and that it supports the conclusion that the site does not pose an unusual threat to the environment.

We hope that this provides the information that you need immediately. We are searching our files for aerial photographs as you requested. Meanwhile, should you have any questions, please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634. Although we are both out of the office this week, we will check our messages frequently and get back to you expeditiously.

Yours very truly,

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

JCA:sb

cc: Mr. Thomas C. McGraw, New Mexico EID
Mr. Ed Wise, Entrix
Mr. Dave Boyer, New Mexico OCD

ALEXANDE:JCA7

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 23, 1991

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Reference: Dispute Resolution Under Consent Decree - Outline of Position, Clean up Levels at Rio Grande Pig Launcher and Receiver.

Dear Donna:

In a recent phone message you indicated that you were unsure of Transwestern Pipeline Company's (Transwestern's) position relative to the cleanup levels at the Belen Rio Grande River Crossing Pig Receiver and Launcher sites. The purpose of this letter is to provide further detail on Transwestern's position as stated in letter invoking dispute resolution on August 16, 1991.

As stated in the letter of August 16, Transwestern's position is that the more stringent criteria which you identified in your letter of July 23, 1991 constitute an unreasonably conservative requirement and that the site in its present condition does not represent "an unreasonable risk". In order to better define this position an outline of some of its bases is provided in the next paragraph. During the informal negotiations prior to litigation, it is our plan to review with you the details of these bases in the hope that your concerns may be dispelled.

The following points form a significant part of Transwestern's Position:

- Changes in procedures and addition of equipment have removed the source of PCBs at the sites.
  The lubricant which contained the PCBs is no longer used. Present operating procedures and equipment, as described in our previous submittal to you, provide for containment and storage of all pipeline fluid which might contain PCBs.

- Significant testing in five previous investigations has indicated that existing concentrations are small and migration, even before removal of the source, has been minimal.
  These data, which were provided to you previously, indicate that out of 74 tests of soils below 2 feet in depth, only two indicate any PCBs (0.13 ppm at 2.2 feet and 7.3ppm at 4 feet).

- o Tests of the soils at the apparent water level beneath the site do not indicate PCBs.
  Four samples were taken at 5 feet with water at 6 feet and later 4 samples were taken at 6 feet with none of them indicating the presence of PCBs.

- o The receiver site is not within the 100 year flood plain and river stages are controlled by drainage structures.

- o Site Access is controlled.
  The sites are fenced and locked. Their mechanical security is equal to the compressor stations.

- o The cited soil clean up level is below that which the US FDA allows in fillets of fish for human consumption.

- o The cited cleanup level, although indicted to be based on protection of surrounding agricultural lands, is significantly more stringent than the level which EPA has allowed in sludges for beneficial reuse on agricultural lands.

As previously mentioned, we look forward to discussing the above factors and others in greater detail during the informal negotiations. It is Transwestern's hope that the litigation step in the resolution procedure can be avoided.

We look forward to seeing you on Monday. Meanwhile, should you have any questions please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

Yours very truly

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

cc: Mr. Thomas H. McGraw, New Mexico EID
Mr. Ed Wise, ENTRIX
Mr. Dave Boyer, New Mexico OCD

INTERNAL DISTRIBUTION:

Walker Sanders
Christie Patrick
Larry Campbell
Kevin McGlynn
Ted Ryther
EA File

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 16, 1991

Ms. Donna Mullins
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Reference: Invocation of Dispute Resolution Under Consent Decree

Dear Donna:

In your letter of July 23, 1991, you indicated that EPA has chosen to promulgate more stringent soil clean up criteria of 1 part per million at the pig receiver and launcher sites at the Rio Grande River crossing near Belen, New Mexico. This letter provides written notice in respect to this standard that Transwestern Pipeline Company (Transwestern) elects to invoke the dispute resolution procedures of the Consent Decree in accordance with Section XV., Dispute Resolution.

Transwestern's position is that the cited more stringent criteria constitutes an unreasonably conservative requirement and that the site in its present condition does not represent "an unreasonable risk". We look forward to discussing our position in detail during the informal negotiations. It is Transwestern's hope that the litigation step in the resolution procedure can be avoided.

Should you have any questions please call me at (713) 853-3219 or Ted Ryther at (713) 853-5634.

Yours very truly

James C. Alexander

James C. Alexander
Manager of Projects
Environmental Affairs

cc: Mr. Thomas H. McGraw, New Mexico EID
Mr. Ed Wise, ENTRIX
Mr. Dave Boyer, New Mexico OCD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

July 23, 1991

Mr. Jim Alexander
Project Manager
Enron Gas Pipeline Group
P.O. Box 1188
Houston, Texas 77254-1188

Re: Transwestern Pipeline Consent Decree
Cleanup Levels for Rio Grande Receiver and Launcher Sites

Dear Jim:

This letter is in response to our meetings on June 17, 1991, and June 24, 1991, at which time we discussed the appropriate cleanup levels for the Rio Grande River Pig Receiver and Pig Launcher sites. According to the Consent Decree, page 40, paragraph B, part 2, "EPA reserves the right to require more stringent cleanup standards based on site specific conditions, including but not limited to shallow depth to groundwater, proximity to grazing lands or vegetable gardens. If upon review of the Site Remediation Work Plan the EPA Project Contact determines that a particular site requires more stringent cleanup levels, the EPA Project Contact will make a written finding based upon the specific facts of the site, to support its conclusion that a more stringent cleanup level is necessary to prevent unreasonable risk."

Based upon the site-specific factors for the two sites in question, EPA has determined that 1 ppm PCB should be the appropriate cleanup level for soils at the two sites. In addition, according to the Consent Decree, page 34, Section IV., groundwater sampling and monitoring shall be conducted at any other sites so determined by the EPA Project Contact. This determination is based upon several factors, which will be expanded upon in this letter.

The sites in question are small ancillary sites, located along the Transwestern Pipeline "right of way". The Rio Grande Pig Receiver is located at the Nicolas de Duran Chaves Grant, 6 miles south of Rio Communities, Valencia County.

1. The site is 200 yards from the Rio Grande River, located in the eastern floodplain of the Rio Grande River.

2. The site is restricted by a fence and it is surrounded by croplands.

groundwater appears to have been reached in split-spoon sample RGC-3-004. Sample RGC-3-004 was collected from a depth of 5.0 feet to 5 feet 6 inches. This indicates that PCBs greater than 1.0 ppm have potentially been detected at less than 1 foot above the water. It appears that from other photos submitted from drill hole sampling at the site, that groundwater is at a depth of approximately 5 to 6 feet across the site.

The Rio Grande Pig Launcher is located at the Nicolas de Churan Chaves Grant, 6 miles south of Rio Communities, west side of the Rio Grande River, Valencia County.

1. The site is 200 yards from the Rio Grande River, located within the western floodplain of the River.

2. The area adjacent to the site is utilized for cattle and horse grazing and agricultural purposes.

3. Several residences are within close proximity to the site.

4. The primary function of this site is to launch a pigging device into the pipeline.

At the time of the soil sampling mission in December, 1990, the concrete slabs beneath the pig launchers were heavily stained and provided no containment for liquids. At the time of the wipe sampling mission in April, 1991, the pad had been resurfaced with fresh concrete and containment capacity had been added. In addition, from pictures taken during the April, 1991, wipe sampling mission, it appears that the area directly adjacent to the site was flooded for purposes of irrigation.

At the Rio Grande River Crossing Launcher, groundwater at the site appears to be at a depth of approximately four to six feet in depth. In drill hole #2 at the site, PCBs were detected at a concentration of 8.2 ppm in sample RGCL-2-002 which was collected from a depth of 2.0 feet to 2 feet 6 inches. Based on a photo of split-spoon sample RGCL-2-003 which was collected from a depth of 3 feet 9 inches to 4 feet 3 inches, it appears that the soil material is moist to damp at that depth. This could indicate that PCBs greater than 1.0 ppm have potentially been detected at less than 2 feet above water. It appears that from other photos submitted from drill hole sampling at the site that groundwater was found at a depth of approximately 4 to 6 feet at the site. A photo of sample RGCL-1-003 which was collected at a depth of 4.0 feet to 4 feet 6 inches from drill hole #1 at the site appears to be quite saturated. Drill hole #1 is approximately 12.5 feet from drill hole #2.

3. The site is also within the boundaries of a protected area for migratory birds.

4. The primary function of this site is the receipt of pig launchers and PCB-contaminated condensate from within the pipeline.

At this time, the PCB-contaminated condensate is removed from the pipeline and stored in a 500 bbl. tank on-site. However, from 1968-1972, PCB lubricating oil was used in the gas turbine at Transwestern Pipeline's Corona, New Mexico compressor station. Seal failures led to the entry of PCB lubricating oil into the pipeline, contaminating downstream facilities. Up until as late as 1984, condensate from the pigging operations was placed into open pits or sumps at the compressor stations and pig receivers. The tank that is presently at the receiver site was not placed there until 1981. Based on past condensate storage records from the Rio Grande Pig Receiver tank from November, 1985 to February, 1987, 7935 gallons of PCB-contaminated condensate was collected during that time period. Before the tank was placed on-site, condensate was collected in a sump. The maximum amount of condensate that the sump could have contained would have been 10 bbls., or 420 gallons. The disposition of the PCB-contaminated condensate, before placement of the 500 bbl tank, is not known by EPA. Furthermore, the integrity of the catch basins underneath the two pig receivers, the piping to the sump and the sump itself (i.e. whether the sump bottom is cracked) is not known. Condensate sampling at the Rio Grande Pig Receiver and downstream at the Laguna Compressor Station indicates that PCBs at a maximum concentration of 3481 ppm PCB, as of January 26, 1984, were still being encountered. A spill cleanup was conducted at the Receiver site during January, 1990, after a 100-gallon spill of pipeline condensate. The area cleaned up was northwest of the northernmost pig receiver, between the pig receiver and the demister. This is the only cleanup at the site that EPA is aware of. It is not known whether any historical cleanup or hauling and filling at the site has occurred.

Selected core sampling was conducted at these sites during December, 1990. Samples were collected from four core holes per site and samples were obtained and analyzed at surface, two, four and six foot depth intervals. At the Rio Grande River Crossing Receiver, groundwater appears to be at a depth of approximately five to six feet in depth. In drill hole #3 at the site, PCBs were detected at a concentration of 7.3 ppm in sample RGC-3-003 which was collected at depth of 4.0 feet to 4 feet 6 inches. Based on another photo of a split-spoon sample from this drill hole,

Groundwater flow conditions have not been studied at either site, and data has not been presented documenting the direction of groundwater flow, hydraulic conductivity and/or transmissivity of the shallow aquifer material, and water quality data has not been presented to EPA Region 6. In addition, lithologic descriptions have not been documented for either site. Additional sampling or groundwater characterization may be necessary to study the potential presence of BTEX and its potential for increasing the presence and solubility of PCBs in groundwater below the site. In addition, documentation has not been provided detailing how the Rio Grande River affects hydraulic or groundwater flow conditions in the area.

To date no sampling for the presence of other constituents, such as Benzene, Toluene and Xylene (BTEX), has been conducted at either site. From circumstances encountered at the four compressor stations remediated under this Consent Decree, BTEX has been encountered at all these sites and it has increased the solubility and the mobility in the soil of the PCBs.

Therefore, based on the shallow depth to groundwater, the predominant agricultural use within the area at both sites, the lack of characterization of groundwater conditions and potential BTEX contamination and EPA's lack of knowledge of past waste handling practices at these sites, a cleanup level of 1 ppm PCB will be required to prevent unreasonable risk to human health and/or the environment.

If you have any questions concerning this response, please call me at (214) 655-7244.

Sincerely,

Donna S. Mullins
EPA Project Contact

cc: Tom McGraw, NMEID
David Boyer, NMOCD
Ed Wise, Entrix