

**GW - 385**

**INSPECTION**

**Lowe, Leonard, EMNRD**

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, October 23, 2008 9:06 AM  
**To:** 'Savoie, Tony'  
**Cc:** Price, Wayne, EMNRD  
**Subject:** GW-385, House Compressor Station

Mr. Tony Savoie,

The OCD appreciates Southern Union Gas's effort to resolve these inspection concerns.

After review of your submittal to our office for the GW-385, A-14 Compressor Station we have concluded.

All findings during the inspection are considered "CLOSED" except for the following concerns that are being addressed by SUG. The OCD will consider them, "in work" and not yet closed until SUG notifies the agency of final resolution as stated within the response.

**I. SUG: Air compressor leaking fuel**

OCD: Please keep the OCD informed of this remediation work, once concluded submit a final report on this work.

**II. SUG: "stained areas around the compressor skid"**

OCD: Keep the OCD informed on this remediation work, once concluded submit a final report on this work.

**III. SUG: "area under the leaking tank valve and catch basin"**

OCD: Keep the OCD informed on this remediation work, once concluded submit a final report on this work.

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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

**Southern Union Gas Services**  
**A-14 Compressor Station**  
GW-385

2008 OCT 22 AM 9 55

RECEIVED

2008 OCT 22 AM 9 55

**16. OCD inspections:**

**Response:**

**Photo 1-2: Air compressor leaking fuel.**

The air compressor was being used at the facility until purchase power could be tied into the new electric compressor that was on-site during the inspection.

Since the inspection of 7/14/08 the temporary air compressor and the diesel fuel tank have been removed from the facility.

Since the fluid that was released was not exempt under RCRA Subtitle C, a waste determination sample was collected from the surface of the release area and approximately 9" below the surface in an attempt to demonstrate vertical extent.

The surface sample will be analyzed for TCLP metals, TCLP BTEX, RCI, and 8015M.

The sample collected at 9" below the surface will be analyzed for 8015M only.

If the samples collected demonstrate that the stained soil is non-hazardous it will be transported to the Southern Union Gas Services landfarm for remediation.

The excavated area will be sampled for TPH using EPA method 8015M, if the excavated area meets the NMOCD guidelines from the remediation of leaks and spills, clean soil and caliche will be brought to the site for backfill. *Still open*

**Photo3-5: Station Sump. Monthly inspection of leak detection.**

The purpose of placing the 320 gal tank inside the double wall tank was to prevent any accidental overflows of the sump, pumping equipment and piping from hitting the ground. On rare occasions the diaphragm pump that transfers the fluid from the sump to the waste water tank fails allowing some fluid to accumulate inside the double wall tank. This system is checked daily, if fluid is discovered inside the containment area it is pumped into the waste water tank using the same pump that controls the sump fluids.

A line will be added to the daily inspection sheet to document that the containment is empty and a monthly check for the leak integrity system for the double wall tank will be added. *closed!*

**Photo 6-11: Surface contamination and catch basin failure.**

The Compressor skid is designed to catch lubricating fluids and wash down fluids and drain them to the station sump. Some of the piping appears to be stressed due to the vibration of the compressor and engine which allowed some of the fluids to drip onto the soil. All of the connections were re-tightened and will be observed closely to assure they are not leaking. Future installations will not incorporate threaded pipe connections. If necessary absorbent material will be used to prevent lube oil from hitting the ground. These absorbents will be placed in the used oil filter containment and disposed of properly. The leaking valve that caused the overflow of the catch basin at the tank containment has been repaired and is currently not leaking.

All containment BMP's will be checked daily and documented. *closed!*

**Remediation of soils:**

The stained areas around the compressor skid was a result of leaking piping and skid containment failures which allowed lube oil to leak onto the soil.

Since the fluid that was released was not exempt under RCRA Subtitle C, a waste determination sample was collected from the surface of the release area and approximately 1 ft. below the surface in an attempt to demonstrate vertical extent.

The surface sample will be analyzed for TCLP metals, TCLP BTEX, RCI, and 8015M extended.

The sample collected at 1 ft. below the surface will be analyzed for 8015M extended only.

If the samples collected demonstrate that the stained soil is non-hazardous it will be transported to the Southern Union Gas Services landfarm for remediation.

The excavated area will be sampled for TPH using EPA method 8015M, if the excavated area meets the NMOCD guidelines from the remediation of leaks and spills, clean soil and caliche will be brought to the site for backfill.

The area under the leaking tank valve and catch basin was sampled at the surface and approximately 1 ft. below the surface. These samples will be analyzed for TPH EPA Method 8015M, BTEX, and Chlorides. The sample collected at 1ft. below the surface did not appear to demonstrate vertical extent. The impacted soil will be excavated and placed on plastic sheeting until a complete analysis of the excavated soil and the excavated area can be done.

Soil chloride concentrations greater than 1000 mg/kg will be disposed in and NMOCD approved facility.

All of the soil will be remediated using the NMOCD recommended guidelines.

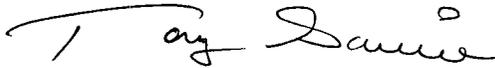
A site Ranking Analysis Sheet is attached.

As of 10/9/08 the only sample analysis that has been received is for the samples taken under the truck loading catch basin.

A copy of the analytical is attached.

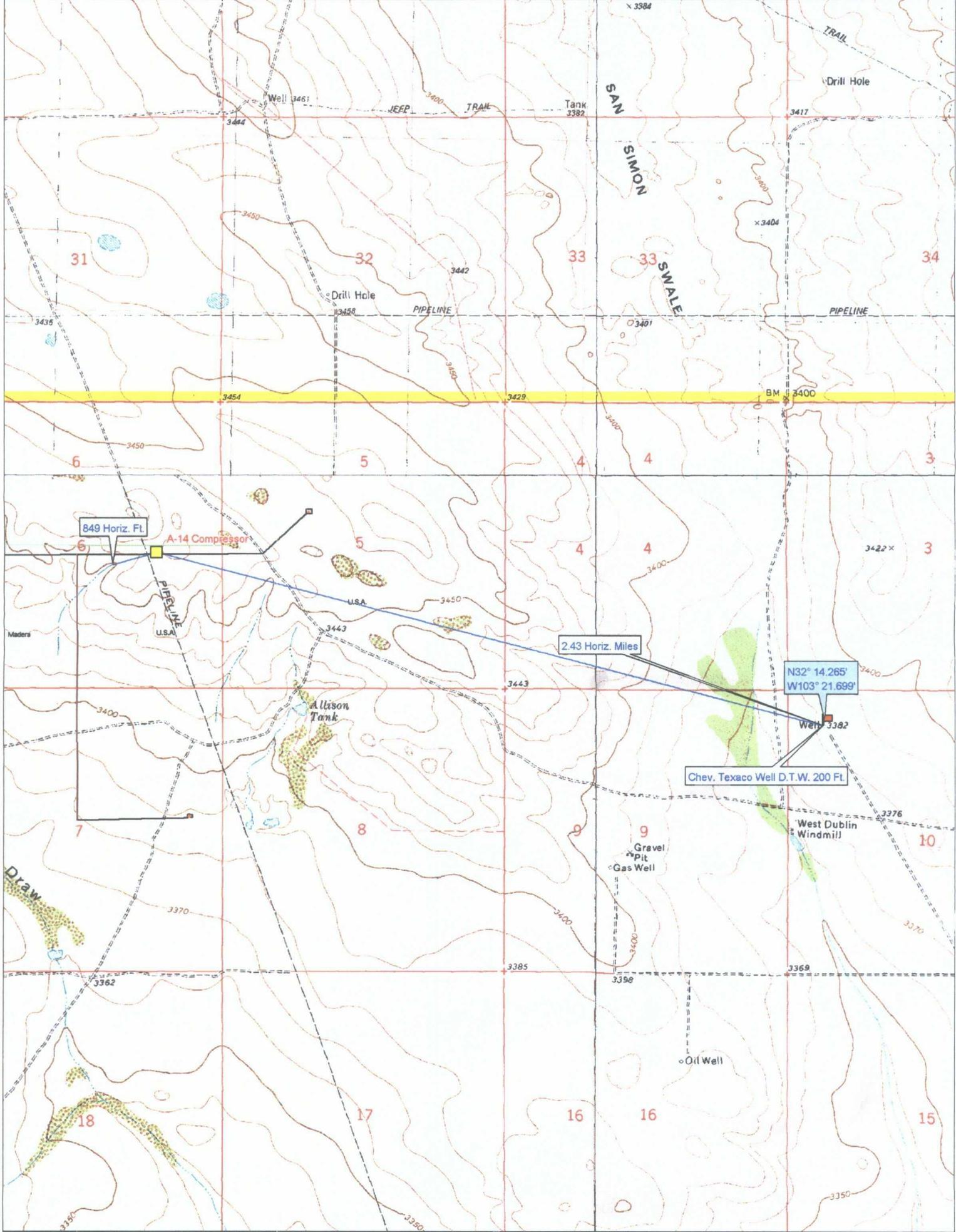
A closure report documenting all of the remediation activities and closure levels will be submitted to the NMOCD by 11/30/08

Tony Savoie



Waste Management and Remediation Specialist

Southern Union Gas Services



849 Horiz. Ft.

A-14 Compressor

2.43 Horiz. Miles

N32° 14.265'  
W103° 21.699'

Well 3382

Chev. Texaco Well D.T.W. 200 Ft.

West Dublin Windmill

Gravel Pit  
Gas Well

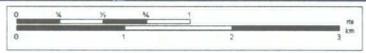
Oil Well

Allison Tank

Draw



© 2002 DeLorme, 3-D TopoQuads®. Data copyright of content owner.  
www.delorme.com



# A-14 Compressor Station GW-385 Ranking Analysis

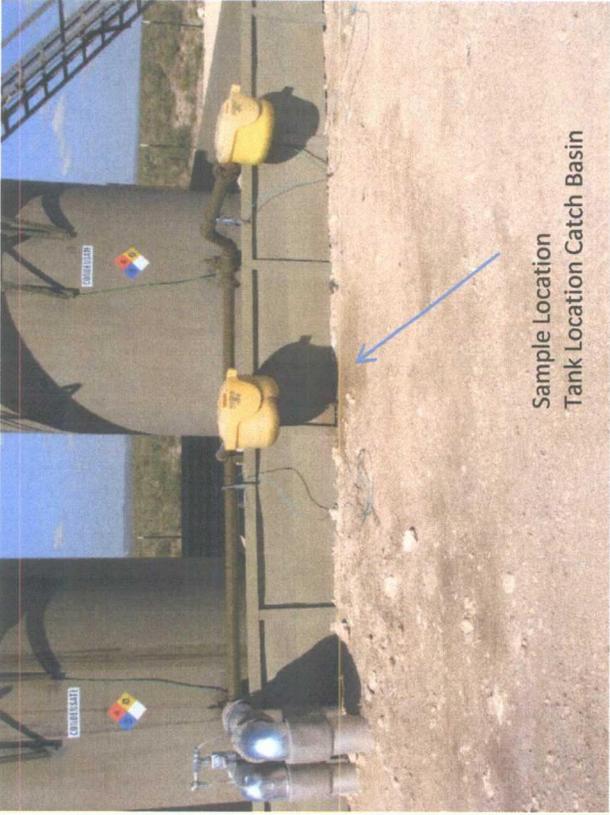
NMOCD Standards			Points
Depth to Ground Water	Greater than 100 ft.		0
Depth to Ground Water	Less than 100 ft. but greater than 50 ft.		10
Depth to Ground Water	Less than 50 ft.		20
Well Head Protection	Less than 1000 ft. from a water source, or;	Yes	20
	Less than 200 ft. from private domestic water source	No	0
Distance to Surface water body	Less than 200 Horizontal. ft.		20
Distance to Surface water body	200 to 1000 Horizontal ft.		10
Distance to Surface water body	Greater than 1000 Horizontal ft.		0
<b>Action levels</b>	<b>&gt;19</b>	<b>10-19</b>	<b>0-9</b>
Benzene (mg/kg)	10	10	10
BTEX (mg/kg)	50	50	50
TPH (mg/kg)	100	1000	5000

Site Ranking			Points
Depth to Ground Water	200 ft.		0
Well Head Protection	2.43 Horiz. Miles		0
Surface Water Body	843 Horiz. Ft.		10
<b>Total Ranking Score</b>			<b>10</b>

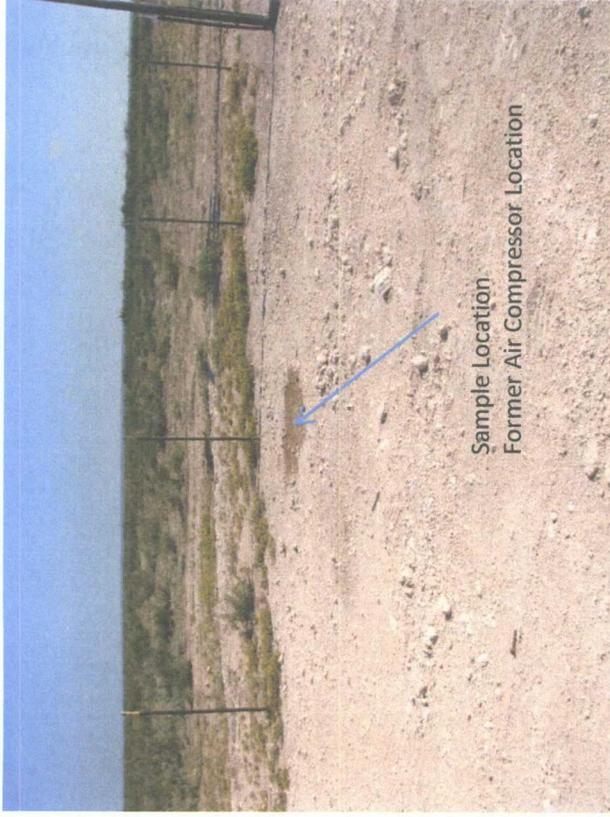
Site Closure Objective	
Benzene (mg/kg)	10
BTEX (mg/kg)	50
TPH (mg/kg) "Surface"	1000
Chloride (mg/kg)	1000

### Remediation Plan:

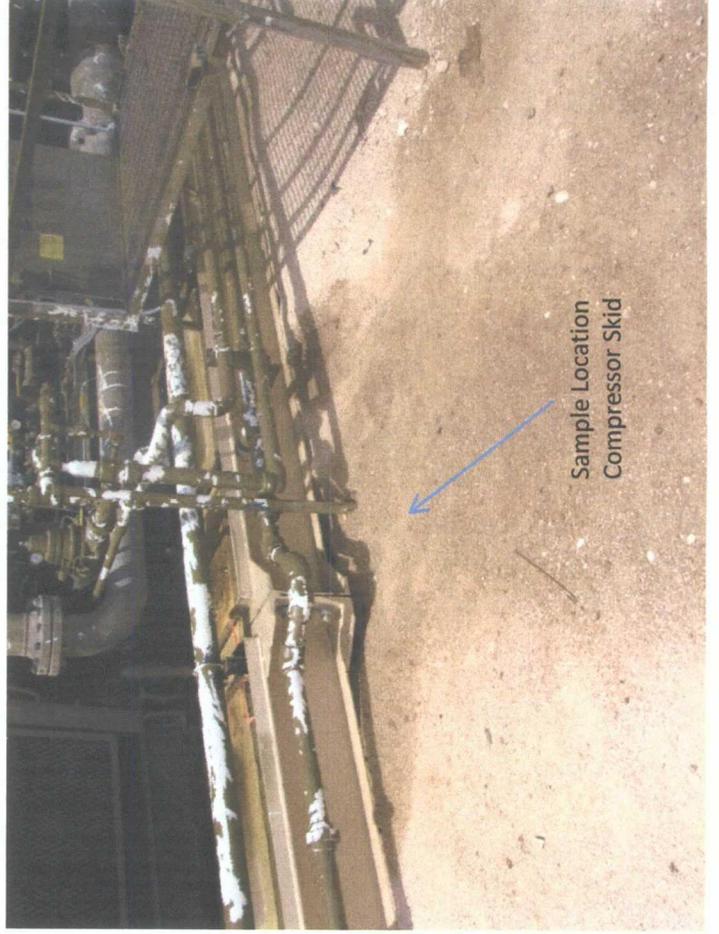
The area under the truck load catch basin will be excavated to approximately 4 ft. in depth, since the soil/chloride levels exceed 1000 mg/kg all of this material will be transported to a facility permitted to receive chloride contaminated soil. Samples will be collected from the bottom and sides of the excavation and analyzed for TPH Method 8015 m, BTEX, and Chlorides. The excavation will continue until the site closures levels have been obtained.
The area under the former air compressor will be excavated and placed on plastic until a complete analysis of the soil has been done. If the material demonstrates to be non- hazardous it will be transported to the SUGS Landfarm for remediation. Samples will be collected from the excavated area and analyzed for TPH Method 8015 Extended to include lube oil and diesel ranges. If the area meets the closure levels it will be backfilled with clean soil and caliche.
The areas around the gas compressor will be excavated and placed on plastic until a complete analysis of the soil has been done. If the material demonstrates to be non- hazardous it will be transported to the SUGS Landfarm for remediation. Samples will be collected from the excavated area and analyzed for TPH Method 8015 Extended to include lube oil and diesel ranges. If the area meets the closure levels it will be backfilled with clean soil and caliche.



Sample Location  
Tank Location Catch Basin



Sample Location  
Former Air Compressor Location



Sample Location  
Compressor Skid

Samples Collected  
10/3/08

## GW-385, Permit Conditions Inspections

Permit signed by Mr. Bruce Williams on September 24, 2008.

**16. OCD Inspections:** The OCD performed an inspection of this facility on July 14, 2008. Tony Savoie provided guidance in the inspection. All photos are in the attached inspection sheet.

**Photo 1 - 2:** An air compressor appeared to have been leaking diesel fuel. Southern Union Gas shall prevent any unwarranted discharges on to the ground. Southern Union Gas shall remediate and prevent any more discharges.

**Photo 3 - 5:** The below grade tank is triple walled. Southern Union Gas shall closely monitor the secondary, primary area to prevent overflow. A monthly record and inspection of the double walled tank shall be maintained by SUG.

**Photo 6 - 11:** Several areas of surface contamination were noted during the inspection. Southern Union Gas shall remediate all soils and prevent any future discharges on to the ground. Doing so is a clear violation of the discharge permit.

**Photo 11,** has an overflowing catch tank that was over looked. The OCD requests that Southern Union Gas formally present their field hands with the conditions of this discharge permit and what they are adhered to. This facility is a clear disregard for best management practices, BMPs for being a new facility.

Southern Union Gas has **30 days, by October 10 2008**, from the date of this permit to submit resolutions to these findings of the inspection conducted.