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GENERAL CORRESPONDENCE

YEAR(S):

Atto BILL OLSON NMOCD

SERVE ON DIVISION RECEITED 103 88 MM 8 52

STATE OF NEW MEXICO NMOCD District I

INTER-OFFICE MEMO

To file: Mobil Pipe Line Co.

August 24, 1995 Date: Time: 9:00 am

Meeting: Telephone call:

Other: X On Site

Person called or attending:

David Ince - Mobil Pipeline Rob Elam-Contractor Wayne Price-NMOCD Buddy Hill-NMOCD Harrison Drilling Co.

- **REFERENCE:** Mobil Pipeline Co. Leak 1 mile due west of Buckeye NM store. sec 26-Ts17s-R34e MPL 4" crude line crosses over the top of GPM's 12" A8 line.
- Soil Boring to determine vertical extent of Subject: contamination.

Comments:

Started drilling soil boring using hollow stem auger, hit hard caliche rock, determined that hole was at south edge of where leak occurred. Moved rig over and drilled thur backfill to 40 feet. Took soil sample with split spoon, dry light brown fine sand with traces of caliche. Ran field tests for TPH = 10 ppm, BTEX PID = 50 ppm. Drilled down to 45 feet and sampled, same matrix as found at 40', ran field test for TPH = 8 ppm, BTEX = 38 ppm. (see sketch attached for location of bore hole.

Called Bill Olson NMOCD Santa Fe, discussed eliminating installing the proposed vapor recovery well and closing hole. Hole is to be filled from bottom to top with Type I-II cement with 3-5 % bentonite.

Discussed issue of road spreading, Texaco had made complaint to NMOCD Jerry Sexton District supervisor, Buddy Hill NMOCD field inspector relayed message to Mobil's David Ince and Wayne Price.

David Ince to discuss road spreading issue with NM State Land Office and Texaco.

Mobil will make sure any soil placed on roads will be remediated per NMOCD guidelines levels and all plastic and large rocks will be removed, roads to be watered, blade and contoured for drainage. Also Mobil will make sure they have permission of area operators. If necessary Mobil is willing to remove soil from roads. Mobil is to call NMOCD for permission if they move any soil off lease roads and when they add water.

Mobil to submit final report to Bill Olson and copies to the NMOCD Hobbs office on all activities of this project. Mobil's report will contain the following information at a minimum.

- 1. A map showing where the soil was placed and sufficient analytical results to verify the soil is below NMOCD guideline limits.
- The results of the soil boring and closure report per Mobil's "Plan of Intent of Remediation" work plan submitted on June 12, 1995.
- 3. Mobil to sample water in buffalo wallow for TPH and BTEX using EPA methods.

2:45 pm Meeting with Jerry Sexton NMOCD Supervisor.

Mobil should not put any more soil on Texaco's roads and if the material placed on the lease roads causes problems during rains etc, then Mobil will be asked to correct.

8/25/55 Wayne Price NMOCD Environmental Engineer-District I

CC: Jerry Sexton-District I Supervisor Gary Wink-NMOCD Field Rep. II Bit-1-001son-NMOCD Santa Fe David Ince-Mobil Pipe Line Co. Eric Nelson-NM State Land Office(Hobbs)



Mobil OII Corporation

P O BOX 900 DALLAS, TEXAS 75221-0000

To: Bill Olson

Date: August 9, 1995

Re: Mobil Oil/Buckeye Spill/ Lab Analysis

Please find attached portions of the 1993 U.S.EPA Memorandum #36 which addresses "Notes on RCRA Methods and QA Activities."

This will provide backup documentation for our determination that the soil sample results submitted to you by David Ince fall below the regulatory concentration.

The "divide by 20" concept is stated briefly in the memo:

"...the maximum theoretical leachate concentration can be calculated by dividing the total concentration of the constituent by 20. The dilution factor of 20 reflects the liquid to solid ratio employed in the extraction procedure. This value can be compared to the appropriate regulatory concentration. If the value is below the regulatory concentration, the TCLP need not be performed."

When this is applied to the total concentration benzene results submitted to you, the levels

Please feel free to call me with any further questions.

Norvels. Norvels. STY195 1400 hrs. Vorbal 900 hrs. Vorbal 900 val to Dave The Work with Work Thank you, Bill Klontz **Environmental Compliance Advisor** (214) 658-5887



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

> OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

PACE

NEMORANDUM & 34

- DATE: January 12, 1993
- SUBJECT: Notes on RCRA Methods and QA Activities
- Prom: Gail Nansen, Chief Lad American Methods Section (08-331)

This memo addresses the following topics:

- 0 1992 Symposium on Waste Testing and Quality Assurance
- Issue Discussion Groups
- Inorganic Methods Workgroup Meeting
- o Organic Methods Workgroup Meeting
- 0 QA Workgroup Meeting
- Miscellaneous Methods Workgroup Meeting
- ICP Discussion Group
- MPLC Methods Discussion Group
- SPA Methods Discussion Group
- SFE Nethods Discussion Group
- SW-846 Update and TCLP Spike Recovery Correction Removal Notice Update

P Total Analysis Versus TCLP.

AUG-08-95 08:16 FROM: EHS/GA-ENVIR. COMPLIANCE

ID: 7038465740

The instrument manufacturers are working with the Agency to determine the optimum SFE conditions for the major classes of semivolatile analytes. This input will help expedite development of a broader scope for Method 3860.

For further information on SFE topics, please contact Barry Lesnik at (203) 260-7459.

SW-246 and TCLP Spike Recovery Corraction Removal Notice

The final SW-846 Update I rule and the proposed Update II rule packages are both currently at the Office of Management and Budget (OMB) review step in the regulatory process. It is not known how long this raview step will take. Once the review by OMB is complete, it is expected that the promulgation of Update I and the proposal of Update II will take at least 2 months.

The rule to delate the matrix spike correction requirement from the TCLP which was finalized on June 29, 1990, has been published (57 FR 55114-56117, November 24, 1992). This rule withdraws the spike recovery correction requirements from the TCLP and, except for a few technical and format changes made in the June 29, 1990 rule revising the TCLP, returns the QA provisions of the TCLP to those promulgated on March 29, 1990 (55 FR 11796). Specifically, this rule requires the method of standard additions as the quantitation method for metallic contaminants when appropriate as specified in the method.

For further information on SW-846 updates or the TCLP rule, please give Kim Kirkland a call at (202) 260-6722.

Totala Analysis Versus TCLP

Over the past year, the Agency has received a number of questions concerning the issue of total constituent analysis with respect to the TCLP. Section 1.2 of the TCLP allows for a compositional (total) analysis in lieu of the TCLP when the constituent of concern is absent from the waste, or if present, is at such a low concentration that the appropriate regulatory level could not be axceeded. A number of persons have contacted the NICE Service and have requested clarification on this issue with respect to a number of waste testing scenarios.

Wastes that contain less than 0.5% dry solids do not require extraction. The waste, after filtration, is defined as the TCLP extract. The filtered extract is then analysed and the resulting concentrations are compared directly to the appropriate regulatory concentration.

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PACE 8

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For wastes that are 100% solid as defined by the TCLF, the maximum theoretical leachate concentration can be calculated by dividing the total concentration of the constituent by 20. The dilution factor of 20 reflects the liquid to solid ratio employed in the extraction procedure. This value then can be compared to the appropriate regulatory concentration. If this value is below the regulatory concentration. If this value is below the regulatory concentration, the TCLP need not be performed. If the value is above the regulatory concentration, the waste may then be subjected to the TCLP to determine its regulatory status.

The same principal applies to wastes that are less than 100% solid (i.e., wastes that have filterable liquid). In this case however, both the liquid and solid portion of the waste are analyzed for total constituency and the results are combined to determine the maximum leachable concentration of the waste. The following equation may be used to calculate this value.

$$\frac{[A \times B] + [C \times D]}{B + [20 \frac{L}{kq} \times D]} = \overline{B}$$

where:

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 $\lambda \approx \text{concentration of the analyte in liquid portion of the sample (mg/L)$

B = Volume of the liquid portion of the sample (L)

C = Concentration of analyte in the solid portion of the sample (sg/kg)

D = Weight of the solid portion of the sample (kg)

E = Maximum theoretical concentration in leachate (mg/L)

To illustrate this point, the following example is provided:

An analyst wishes to determine if a lead processing sludge could fail the TC for load. The sludge is reported to have a low concentration of load, and the analyst decides to perform a compositional analysis of the waste instead of a full TCLP evaluation. A representative sample of waste is subjected to a preliminary percent solids determination as described in the TCLP. The percent solids is found to be 75%. Thus, for each 100 grams of this waste filtered, 25 grams of liquid and 75 grams of solid are obtained. It is assumed for the purpose of this calculation that the density of the filterable liquid is equal to one. The liquid and solid portion of the sample are then analyzed for total lead. The following data are generated:

PAGE 10

AUG-09-95 00:17 FROM: EH8/GA-ENVIR, COMPLIANCE

ID: 7038485740

Percent solids = 75% Concentration of lead in the liquid phase = 0.023 mg/l Volume of filtered liquid = 0.025 L Concentration of lead in the solid phase = 95 mg/kg (wot weight) Weight of the solid phase = 0.075 kg.

The calculated concentration is as follows:

 $\frac{[0.023 \frac{mg}{L} \times 0.025L] + [05 \frac{mg}{kg} \times 0.075kg]}{0.025 L + [20 \frac{L}{kg} \times 0.075kg]} = 4.18 \frac{mg}{L}$

In this case, the maximum leachable concentration is below the 5 mg/l regulatory concentration for lead, and the TCLP need not be performed.

Non-aqueous based wastes (i.e., oily wastes) may be calculated in the same manner as described above, except the concentration of constituents from the liquid portion of the waste (A in the above formula) are expressed in mg/kg units. Volumes also would be converted to weight units (kg). The final leachate concentration is expressed in mg/kg units.



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STATE OF NEW MELICO OL CONSERVITION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

Time Date Telephone 10:25 Personal Originating Party Other Parties Envir. Shree hee - 2346 8 S Subject Discussion 5 Bunkeye 20 hee Rn D/ 0 6eme 10r mo Conclusions or Agreements H' ゎ 9 50 56 815 Distribution File. Jerry Sexten - OCD Hobbs Way to Price - OCD Hobbs Signed

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Originating Party	Other Parties
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6-12-95

PLAN OF INTENT OF REMEDIATION MOBIL USM&R

MOBIL PIPELINE LEAK NUMBER 315-95-15, DATED 3-9-95, IN VACUUM GATHERING SYSTEM, BUCKEYE NEW MEXICO. SOUTHEAST QUARTER/SEC. 26/T17/R35E OF LEA COUNTY.

REMEDIATION WORK PERFORMED: The contaminated soil has been removed to a depth of 30 feet and placed on plastic. A composite sample of the contaminated soil has been tested for benzene and ignitability. A copy of the result is attached, the result being within acceptable limits.

The large hole has been backfilled with fresh dirt, for safety, with the approval from New Mexico Oil Commission.

PLAN OF CONTINUED REMEDIATION : We plan to drill a test hole to determine maximun depth of contamination. Documentation will be made of location and concentration of all non removed contamination. A perforated pipe with a vent on top will be installed in the test hole to continually vent sub contamination.

All remaining contaminated soil will then be blended to meet the .5% New Mexico guidelines and spread on adjacent roads. The land owner, which is the State of New Mexico Land Commission, agreed to this procedure.

TESTING : All testing will be done by independent contractor.

WORK PERFORMED: All work and testing will be done by Mid Tex Construction Company, out of Odessa, Texas, 915-381-2710 Once started, remediation will be taken to closure within two weeks.

The sub vent will be monitored and closed when appropriate.

Sincerely,

D.C. Ince

David C. Ince Construction Tech.



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PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

		BTE	XANA	ALYSI	S RE	PORT			
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QC Recovery	0.960
QC Spike	0.878
Accuracy	109.3%
Air Blank	<0.001

Methods - GAS CHROMOTOGRAPHY - EPA SW-846; 8020

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STATE OF NEW MEXICO NMOCD District I

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INTER-OFFICE MEMO

To file: Mobil US M&R (Pipeline)

Date: May 12, 1995 Time: 2:15 pm

Telephone call: ____ Meeting: ____ Other: _X___

Site Visits

Person called or attending:

see below

REFERENCE: Mobil Pipeline Leak (MPL)-see attached spill report.

Subject: Field reports

Comments:

- 1. 3/9/95 2:55pm MPL notified NMOCD (B. Prichard) of leak.
- 2. 3/13/95 MPL notified NMOCD correction on spill quantity from 400 bbls. to 700 bbls. per David Ince.
- 3. 3/13/95 3:00pm Wayne Price NMOCD visited site. MPL personnel; Jack Murrey, Robert Eckols Mid-Tex Const. Hole dug out 16' deep below line leak, contaminated soil on plastic. Bottom hole TPH 4480 ppm, dirt pile 8.8% TPH per contractor. MPL 4" crude line located in sec 26, t17s, R34e just west (140) steps from Marathon well #5 located in (sw/4 sw/4 sec 25, t17s, R34 e). Line is located on the east side of a buffalo wallow. Leaked occurred where MPL 4" crude line crosses over the top of GPM's 12" A8 line.

MPL contractor requested a copy of Leak and spill guidelines. Gave them a set of guidelines.

- 4. 3/15/95 7:15 am telephone call (Price & Ince) progress report and set up meeting at site.
- 5. 3/15/95 approx. 11:00 am site visit. Personnel; Wayne Price NMOCD; MPL personnel David Day, Robert Echols. Hole 25 ' deep, bottom of hole shows signs of gross contamination. Took soil sample from bottom hole strong hydrocarbon smell, cream colored, bottom hole TPH 35,000 ppm, BTEX (PID) >2500 ppm. Took pictures.
- 6. 3/16/95 9:00 am site visit Wayne Price, Bill OLSON NMOCD; MPL personal David Day, David Ince, Terry Lowe, Robert Eckols (MPL contractor). Hole is approx. 30' deep. Bottom of hole sample taken from most recent dirt pile read 2.8 % TPH, BTEX >2500 ppm (PID).

Discussed procedures on clean-up with MPL. Mobil will bring in clean caliche to fill in hole. They will submit a work plan to address the remaining contaminates in the hole and the dirt pile. They will sample the dirt pile to determine if it is hazardous waste.

Gave MPL NM State Engr. office telephone #.

Called NMSE, depth of ground water in nearby windmill is 117'. Also depth of ground water at buckeye is approximately 90-110'.

- 7. 3/21/95 8:45 am took pictures.
- 8. 3/21/95 9:00 am MPL David Ince, Wayne Price NMOCD, Eric Nelson and Leon Anderson NM State Land office; on site.

MPL and NMSLO discussed different land use issues concerning the area. This is NM State Land. They also discussed where caliche could be purchased.

5/13/95 dine Wayne Price NMOCD Environmental Engineer-District

cc: Jerry Sexton-District I Supervisor (Billi Olson=Hydrogeologist NMOCD Santa Feroffice

attached- pictures, sketch of area.