

MEMORANDUM

TO: FILE

FROM: Teri Davis, Technical Compliance Program

THROUGH: Ron Kern, Program Manager
Barbara Hoditschek, Program Manager

DATE: November 8, 1994

SUBJECT: November 1, 1994 Meeting Notes between HRMB and Transwestern Pipeline Company (TW) to Discuss Notice of Deficiency (NOD) for Roswell Compressor Station Surface Impoundments Closure Plan.

Meeting list:

Ron Kern, HRMB
Barbara Hoditschek, HRMB
Cornelius Amindyas, HRMB
Teri Davis, HRMB
George Robinson, ENRON (TW)
Bill Kendrick, ENRON (TW)

Hazardous and Radioactive Materials Bureau (HRMB) staff met with TW representatives, on November 1, 1994, to discuss the September 28, 1994 NOD on TW's Roswell Compressor Station Surface Impoundments Closure Plan. TW requested this meeting through written request dated October 12, 1994. In the October, 1994 letter, an extension of time to respond to the NOD was requested for December 15, 1994. The following are the major issues discussed in the meeting.

Barbara Hoditschek stated at the beginning of the meeting that the Closure should follow 40 CFR Part 265 standards. It was also stated that this will be the last modification to the current Closure Plan HRMB will accept before enforcement action will be taken.

Waste characterization requirements were discussed with the facility (NOD Comments #8 and #12). The facility agreed to modify the closure plan to reflect the comments in the NOD. All pits would have at least 2 continuous split-spoon boreholes drilled to at least 10 feet below the bottom of each pit. All samples will be analyzed for Appendix VIII constituents. NMED reiterated that a sub-set of Appendix VIII constituents, at a minimum Appendix IX, will constitute the sampling list for the soil and ground-water assessment phases depending on the results of the waste characterization. Due to the uncertainties of the location of Pit 3, TW stated that numerous borings may be needed to adequately locate and characterize the pit.

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TW reiterated from the previous TW cover letter, May 31, 1994, that TW is considering other regulatory options for this site. Other regulatory avenues TW is considering include: 1) OCD jurisdiction, 2) contained-in issue, and 3) CAMU consideration.

TW stated that the information pertaining to the quantities of waste estimated in the Part A permit are incorrect. The quantities reported are greatly larger than actual quantities. Barbara requested that TW resubmit their Part A in lieu of this information.

TW mentioned they are working towards gaining off-site access for sampling locations. The land is State owned and TW indicated that this should not pose a problem.

The investigative approach to soil and ground water assessment was discussed at length (NOD Comments 10, 12, 16, 17, and 19). NMED stated that for each new RCRA-intended monitoring well to be installed and developed, a complete Appendix IX sampling is required. The hazardous constituent list for this site may be inclusive of all, in part of , or in addition to, Appendix IX sampling. Quarterly sampling frequency and reporting requirements were discussed as requirements during the assessment phase as reiterated from the NOD.

NMED stated that once nature, rate, and extent were determined, a baseline-risk assessment will be required to help establish media clean-up standards. A corrective measures proposal report will consider the results of the baseline-risk assessment and propose suitable remediation options at that time. It appeared that TW was under the impression that remedial options needed to be included in the closure plan. NMED reiterated that the steps to investigation should be as follows:

- 1) Resubmit the modified Closure Plan to HRMB by December 15, 1994. If approved proceed to step two (2).
- 2) Waste characterization of all pits with respect to Appendix VIII hazardous constituents.
- 3) The results of the waste characterization should be submitted to HRMB in report form. NMED will develop a hazardous constituent list for sampling of soil and ground water during the assessment phase.
- 4) Phase reports should be submitted during each assessment phase when decision points are needed in the investigations.
- 5) Summary reports should be submitted at the completion of each assessment (soil and ground-water).

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6) HRMB will conclude when the nature, rate, and extent have been determined based on the results of the assessment summary report.

7) A baseline-risk assessment should be developed to help establish media clean-up standards. A corrective measures study can include the risk-assessment (RA) or these documents can be submitted separately, with the RA submitted first.

8) Additional requirements and steps can be found in the 40 CFR Parts 264, 265, and Subpart S.

HRMB requested that quarterly reports be submitted on the interim measures ongoing at TW. TW agreed to submit these quarterly reports starting with the most current information.

HRMB requested that the current interim measures continue at TW with the exception of using MW-1 as a recovery well. HRMB requested in the previous NOD that MW-1 be plugged and abandoned to prevent cross-contamination between perched zones. TW stated in the meeting that they do not wish to plug well MW-1. HRMB requested that TW submit a written request within 75 days stating the reasons why well MW-1 should not be plugged.

HRMB requested that TW submit a sampling plan to HRMB for the sampling of all down-gradient wells within a two-mile radius of the site and the on-site production well. The feasibility of gaining access to these wells (6 in total) should be explained in the sampling plan. Sampling parameters, procedures and time-frames should be included in the proposal.

HRMB requested that TW include in the modified closure plan a schedule for closure. TW stated that a letter will be written asking for a 75-day extension and the reasons for the extension, including additional work to be conducted by TW aside from the previous NOD.