

L3025 (SWR-REC)

CERTIFIED-RETURN RECEIPT REQUESTED

SEP 16 1994

Mr. Mike Grimm
Environmental Safety and Regulatory Affairs
Amoco Production Company
501 Westlake Park Boulevard
Houston, Texas 77253-3092

Dear Mr. Grimm:

The National Park Service has reviewed the Work Plan and preliminary data submitted by Amoco Production Company for site characterization at the South Sprint Facility located at Padre Island National Seashore, submitted on May 27, 1994. We commend Amoco for proceeding in accordance with the site characterization guidance that was provided to them by the National Park Service. Please proceed to determine the zero edge of the dissolved hydrocarbon plume, with consideration of the following comments.

MONITORING NETWORK

BTEX (benzene, toluene, ethylbenzene and xylene) concentrations using hydropunch/field gas chromatograph and lab results during well installation indicate that the areal extent of contamination has not been defined to the north, northwest and south of the site. A complete round of water quality sampling was scheduled for May 1994, but those results are not in this packet of information. These results should help confirm the extent of the contamination. We note that the scope of work is proposing to begin to define the horizontal extent of the contamination by using a hydropunch. However, the scope of work is silent with regard to the identification of vertical contamination. Also, all of the monitoring wells are shallow, about 15 feet; however, the description could be interpreted two ways. Construction diagrams would be useful to confirm it.

CONTAMINANTS OF CONCERN

We note that Amoco has selected two wells (OW-15 and OW-16) in the tank farm area to analyze for volatiles and semivolatiles. This is to confirm that BTEX is adequate for monitoring this site. Since two "hot spots" have been identified, the tank farm and the old pit area, we recommend that the constituents or contaminants of concern be confirmed by obtaining a sample from the pit area also.

It appears that standard procedures are being followed with regard to sample chain-of-custody, holding times, and lab quality assurance (spikes and duplicates). However, the actual procedures are not covered in the Quality Assurance Project Plan (QAPP). We would prefer to see a more detailed QAPP that describes how samples are collected in the field, what decontamination procedures are followed, and how accuracy is assured in the laboratory. For instance, it appears that the duplicate samples that have been collected by Amoco have been submitted under the same site name. We recommend that duplicate samples be coded so that the lab's performance can be checked without the lab knowing what site the duplicate came from.

Should you have any questions, please feel free to contact Linda Dansby, of my staff, at 505-988-6711. We look forward to continue working with you on this issue.

Sincerely,

/s/ John E. Cook

Regional Director,
Southwest Region

cc:
Superintendent, Padre Island

✓ Superintendent, Padre Island
Attention: Paul Eubank

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