GW - 164

INSPECTION

(Drain-lines, Sump, BGT, Site, etc.)

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, November 24, 2009 9:22 AM
To: 'Schornick, Mike'
Cc: 'Michelle Green'
Subject: GW-164. Retrofit

Mr. Schornick,

The OCD has reviewed the following submitted report from Larson and Associates Environmental on behalf of Wood Group ESP group, Inc.

Sump integrity Test Results and Retrofit plan, Dated November 16, 2009

Via our phone conversation this morning, Tuesday, November 24, 2009, the OCD approves retrofit design.

OCD will wait on the As-built report with photographs once all retrofit work is completed.

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
Website: http://www.emnrd.state.nm.us/ocd/

Wood Group ESP Inc.

RECEIVED

2009 NOV 18 PM 1 58

November 16, 2009

VIA EMAIL: Leonard.Lowe@state.nm.us

Mr. Leonard Lowe
Environmental Engineer
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 88505

RE: Sump Integrity Test Results and Retrofit Plan
Wood Group ESP, Inc., Hobbs Test Facility (GW-164)
8426 North Dal Paso, Hobbs, New Mexico 88240

Dear Mr. Lowe:

This letter report was prepared with the assistance of Larson and Associates, Inc. (LAI) on behalf of Wood Group ESP, Inc. (WGESP) and is submitted to the New Mexico Oil Conservation Division (OCD). This letter report presents the hydrostatic test results and retrofit plan for two (2) sumps located at the Hobbs Test Facility (GW-164) in Unit D (NW/4, NW/4), Section 35, Township 17 South and Range 38 East, Lea County, New Mexico. The facility physical address is 8426 North Dal Paso, Hobbs, New Mexico. The global positioning system coordinates are north 32° 47' 51.0" and west 103° 7' 38.5". Figure 1 presents a location map.

Background

On August 27, 2009, during a compliance inspection of the facility, the OCD requested WGESP to conduct hydrostatic testing of five (5) sumps to ensure integrity. The OCD also notified WGESP that the sumps will require upgrading to comply with its existing rules (NMAC 19.15.17.11). The upgrade would require retrofitting the sumps, following the integrity demonstration, with fiberglass liners designed to allow monitoring of leakage in the space between the fiberglass liner and concrete containment.

On September 4, 2009, during a conference call with the OCD, WGESP expressed a desire to retrofit two (2) sumps, located at the drain near the south side of the building (South Drain Sump) and pump cleaning area (Wash Bay Sump) inside the test building. WGESP proposed to close three (3) sumps located in the covered drum storage area, southeast storage area and east covered storage area. The OCD was in agreement with the proposal and WGESP requested a list of procedures from the OCD for demonstrating sump integrity.

On September 14, 2008, OCD provided the following procedures for WGESP to use in hydrostatic testing and verification of sump integrity, including:

- Clean out the sumps: bottoms and walls;
- Photograph sumps once clean;
- Fill sumps with clean or fresh water and allow them to sit over 24 hours;
- Take photographs of sumps full of water;

- Take photographs of sumps when 24 hour period is over; and
- Properly dispose of used hydrostatic water.

Appendix A presents the hydrostatic testing procedures.

The hydrostatic test results for the three (3) sumps were submitted to the OCD in a letter report dated October 13, 2009. The OCD approved the closure plan and the sumps were closed on November 3, 2009.

The south drain sump and wash bay sump were hydrostatically tested on September 14, 2009 and September 18, 2009, respectively. The fiberglass liner in the south drain sump was damaged during removal from concrete containment and could not be tested, therefore, only the concrete containment of the south drain sump was tested. The wash bay sump was hydrostatically tested with the fiberglass liner intact. Figure 2 presents a facility drawing and sump locations.

South Drain Sump
The south drain sump was constructed of concrete with a fiberglass liner. The fiberglass liner was approximately the same dimension as the concrete containment which measures 36 x 47 ¾ x 47 ½ inches. The fiberglass liner was recessed into the concrete containment and sealed with silicon calking. The bottom of the fiberglass liner was flush with the concrete floor. The fiberglass liner was equipped with leak detection to allow monitoring of the space between the fiberglass liner and concrete containment. However, the fiberglass liner was not in compliance with existing OCD rules due to the bottom of the liner being flush with concrete floor. Figure 2 presents the sump location. Figure 3 presents the sump dimensions.

The fiberglass liner was damaged during recent efforts to remove the line and miscommunication of OCD procedural hydrostatic test requirement. Facility personnel cleaned and photographed the concrete containment before hydrostatic testing. On September 14, 2009, facility personnel filled the concrete containment, near full, with fresh water to begin the hydrostatic test. The test began at 11:21 am on September 14, 2009 and was concluded at 11:22 am on September 15, 2009.

The concrete containment was marked prior to filling and the fluid level remained substantially unchanged during the test. The hydrostatic test results confirm that the integrity of the concrete containment was not compromised. Photographs 1 through 3, presented in Appendix B, represent the south drain sump testing.

Wash Bay Sump
The wash bay sump was constructed of concrete with a fiberglass liner. The fiberglass liner measured approximately 16 3/8 x 16 3/8 x 26 ½ inches and recessed into the concrete containment and sealed with silicon calking. The bottom of the fiberglass liner was flush with the concrete floor. The fiberglass liner is not equipped with leak detection to allow monitoring of the space between the fiberglass liner and concrete containment. The fiberglass liner is not

in compliance with existing OCD rules due to the lack of leak detection and the bottom of the liner being flush with concrete floor.

Facility personnel cleaned and photographed the fiberglass-lines sump prior to conducting the hydrostatic test. The fiberglass liner was visually inspected for cracks and holes and none were found. On September 18, 2009, facility personnel filled, near full, the fiberglass liner with fresh water to begin the hydrostatic test. The test began at 10:29 am on September 18, 2009 and was concluded at 10:31 am on September 19, 2009. The fiberglass liner was marked prior to filling and the fluid level remained substantially unchanged during the test. This concludes that the integrity of the fiberglass liner was not compromised. Figure 2 presents the sump location. Figure 4 presents the sump dimensions. Photographs 4, 5 and 6, presented in Appendix B, represent the wash bay sump.

Hydrostatic Test Conclusion
Based on the results of the hydrostatic testing, observations of the sump conditions, and concurrence by our consultant LAI, WGESP concludes there was no potential for any significant release and the integrity of the south drain and wash bay sumps was not compromised.

Retrofit Plan
WGESP proposes to retrofit the south drain and wash bays sumps to comply with OCD rules (NMAC 19.15.17.11). WGESP will install a 1-inch thick ~~steel grate~~ * in the bottom of the concrete containment to provide space to monitor leakage from the fiberglass liner. An inspection tube will be built into the new fiberglass liner for monitoring leakage between the liner and concrete containment. The upper surface between the fiberglass liner and concrete will be sealed with silicon calking. WGESP will submit a report, including photographs, to the OCD once the retrofit work is completed. Figure 3 and Figure 4 present the proposed retrofit schematics for the south drain and wash bay sumps, respectively.

Your concurrence with the hydrostatic testing conclusion and approval of the retrofit plan is requested. Please contact me at (405) 671-2145 if you have questions.

Sincerely,
Wood Group ESP, Inc.

Mike Schornick, P.E.
Environmental Engineer

Cc: Sam Baron – WGESP, Midland, TX
Rod Burrola – WGESP, Hobbs, NM
Mark J. Larson – Larson & Associates, Inc.

*FIBER GLASS WITH PORTS FOR LATERAL MOVEMENT OF FFUIDS.

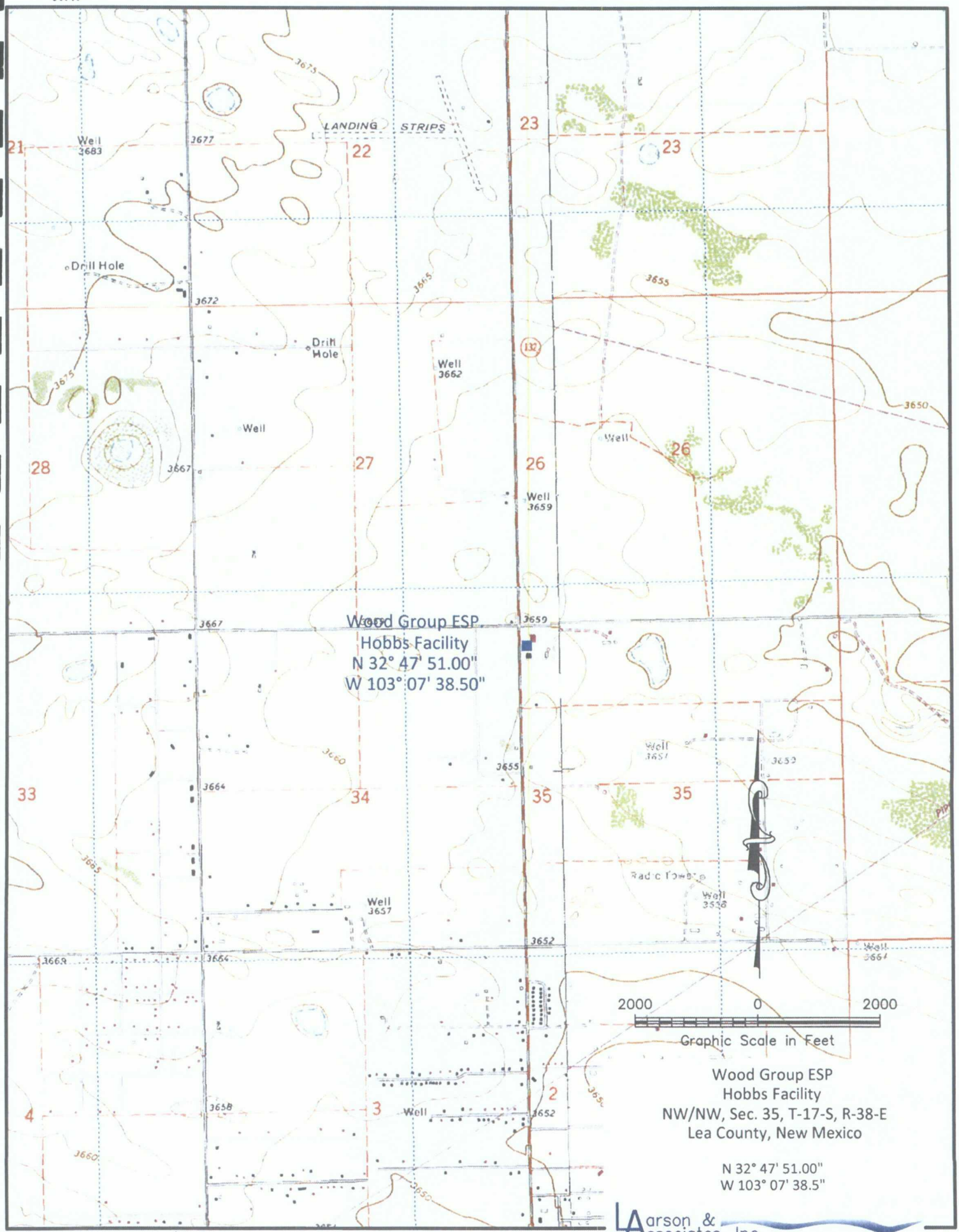
Lowe

11.24.09

Via M. Schornick. telephone

JWW

Y:\PROJECTS\WOODGROUP\HOBBS FACILITY\2009 Projects\8-0113-04\Hobbs Test Shop.dwg, 11/13/2009 4:43:57 PM



Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 1 - Topographic Map

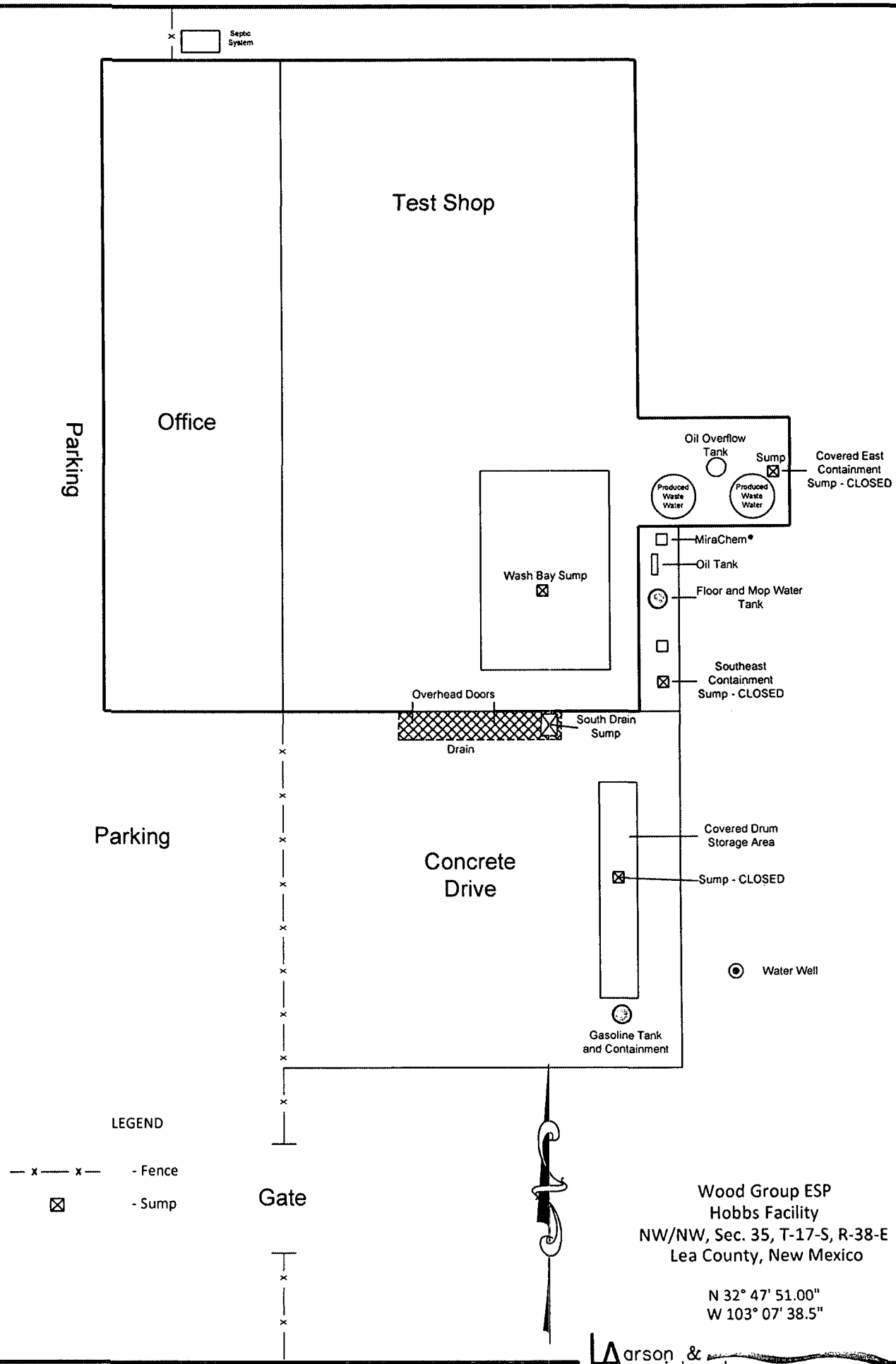
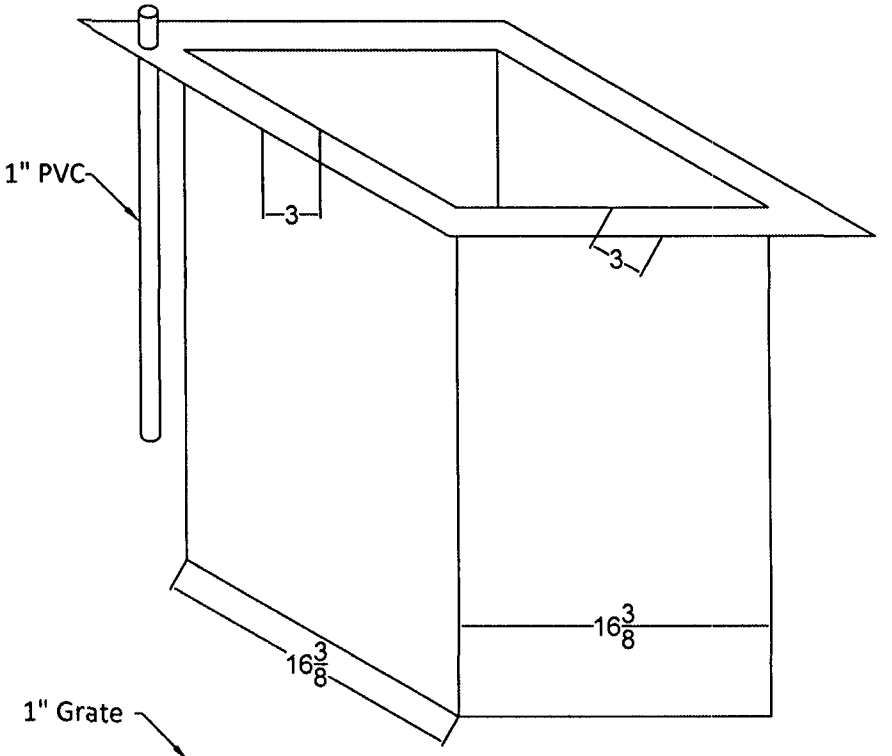
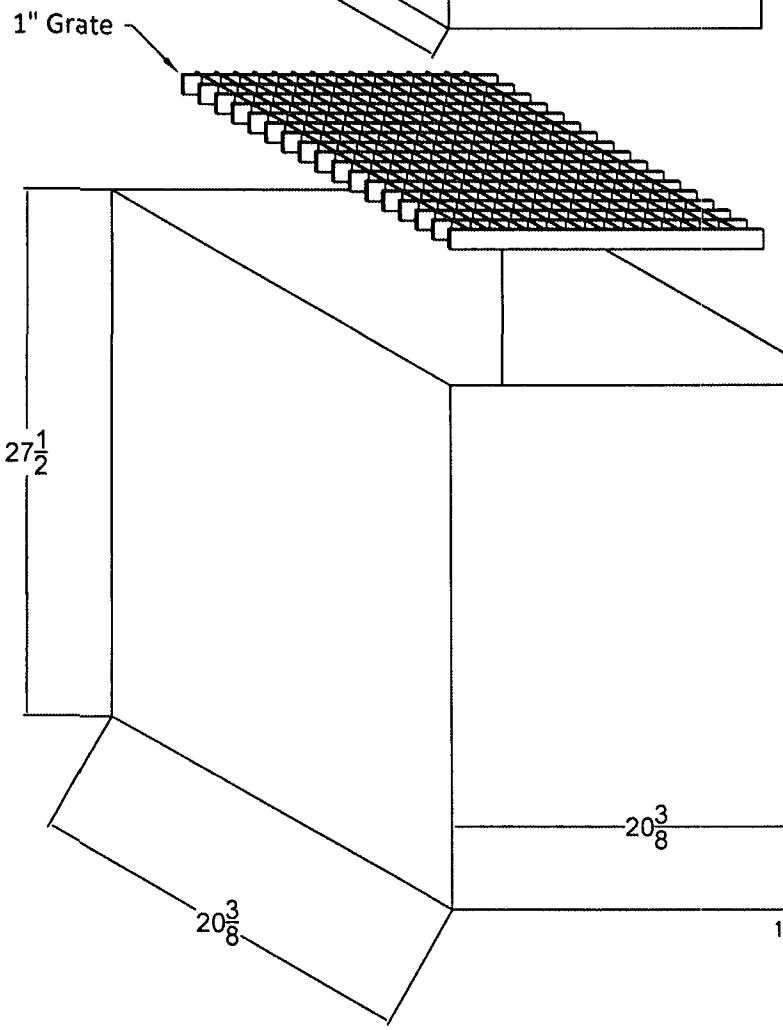


Figure 2 - Facility Drawing

Larson & Associates, Inc.
Environmental Consultants





10 0 10

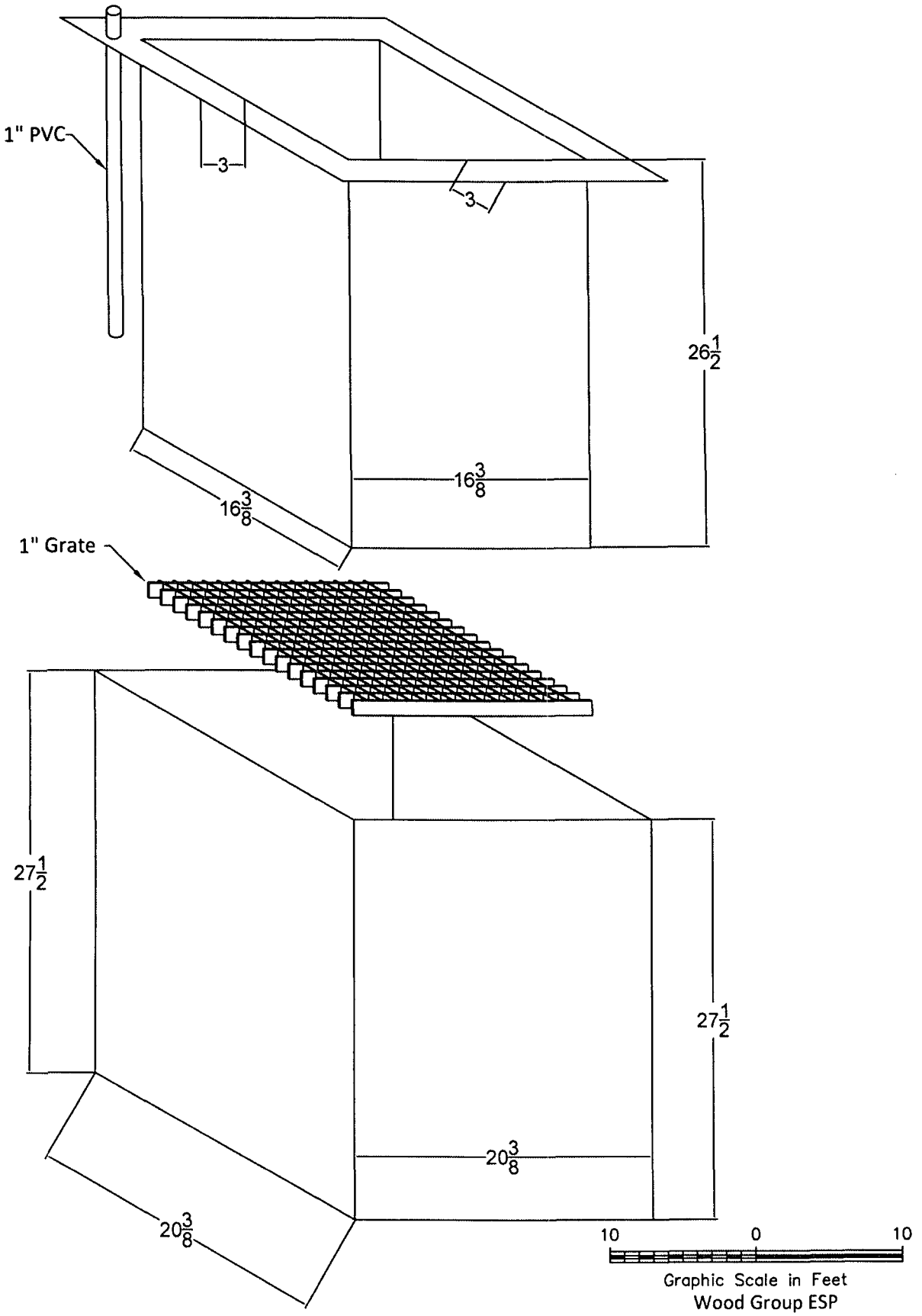
Graphic Scale in Feet

Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 3 - South Drain Sump (Near Overhead Door)



Graphic Scale in Feet
Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 4 - Wash Bay Sump

Wood Group ESP, Hobbs, Containment Sump Hydrostatic Test Procedures:

1. Prior to conducting the test, any accumulated trash, debris, or product present must be removed from the containment sump and properly disposed.

2. Damaged containment sumps should not be tested, but should instead be noted in the test log and reported to the OCD by Mike Schornick, the Environmental Engineer for WGESP NAO.

3. Any ancillary equipment present inside the sump should be inspected for product leaks, and repaired prior to testing.

4. Fill the containment sump to just below the grate level.

5. Draw a straight line at the top of the water line using a paint marker. Allow the water to "settle" in the containment sump and record the time in the test log.

6. Cover the containment sump, using its lid or an alternative cover, and allow the containment sump to sit undisturbed for 24 hours.

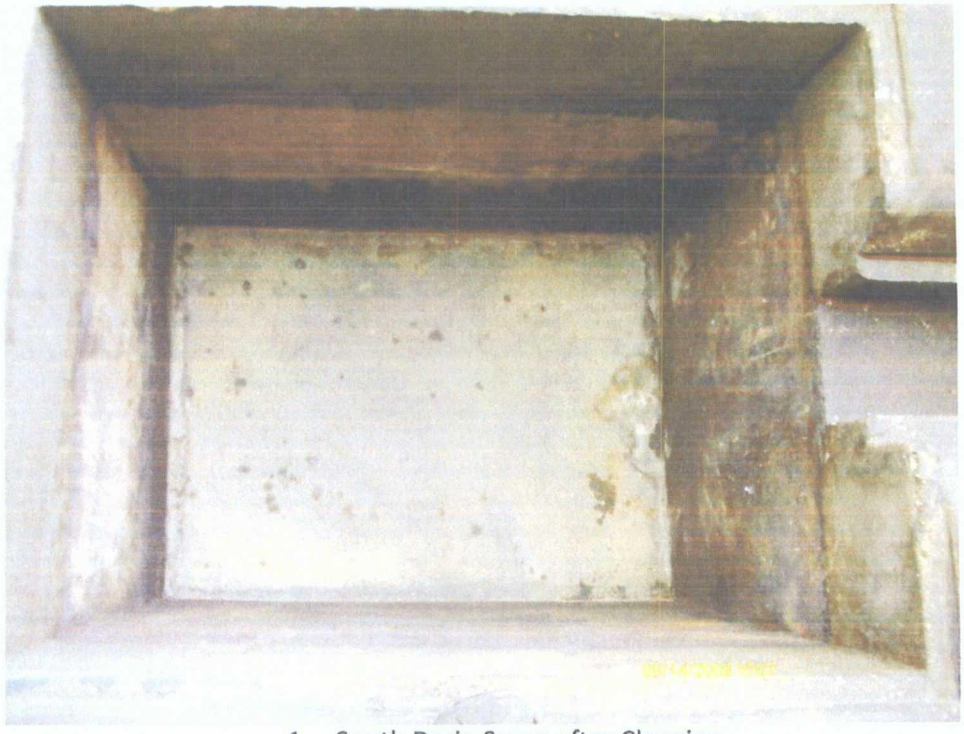
7. After the allotted time frame specified in #6 has elapsed, measure the height of the water level with a measuring device that is accurate to 1'16th of an inch. Measure from the water line to the line made in step #5. The test fails if the water level drops 1/8th of an inch or more.

8. Record the time, date, and test results in the test log.

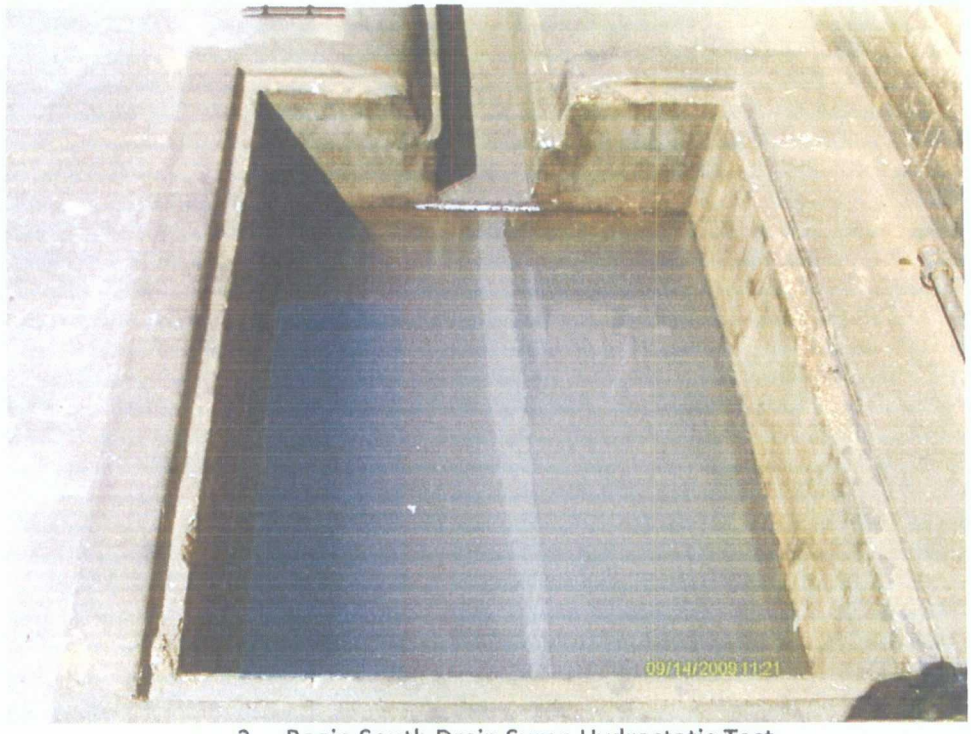
9. All water must be removed at the completion of the test. It may be re-used for testing purposes or must be properly disposed.

10. After fiberglass liners are removed, concrete containments will be hydro tested using this same procedure with the exception of allowing the water level to stabilize for 72-hours prior to starting the 24-hour timer. This will allow for saturation of the dry concrete in the outer sump.

Photo Documentation

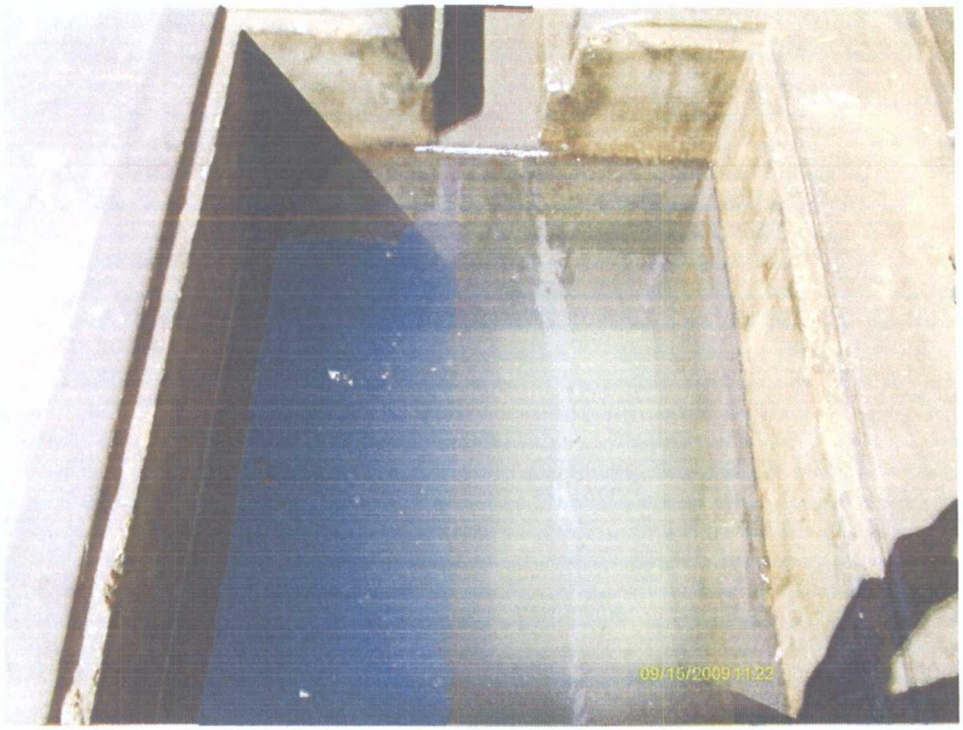


1. South Drain Sump after Cleaning

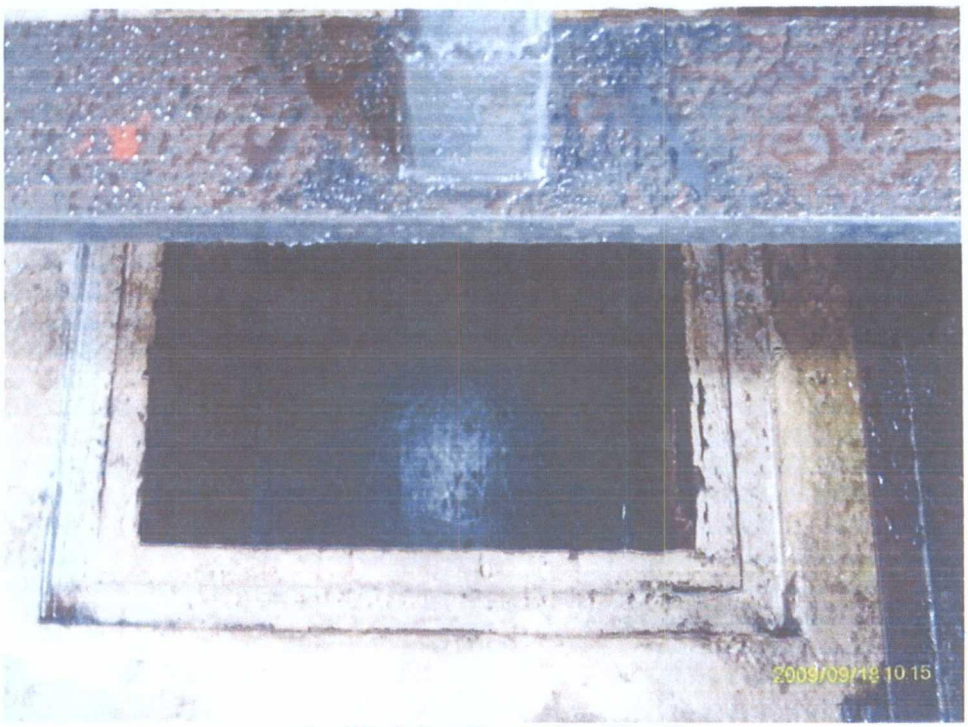


2. Begin South Drain Sump Hydrostatic Test.

Photo Documentation

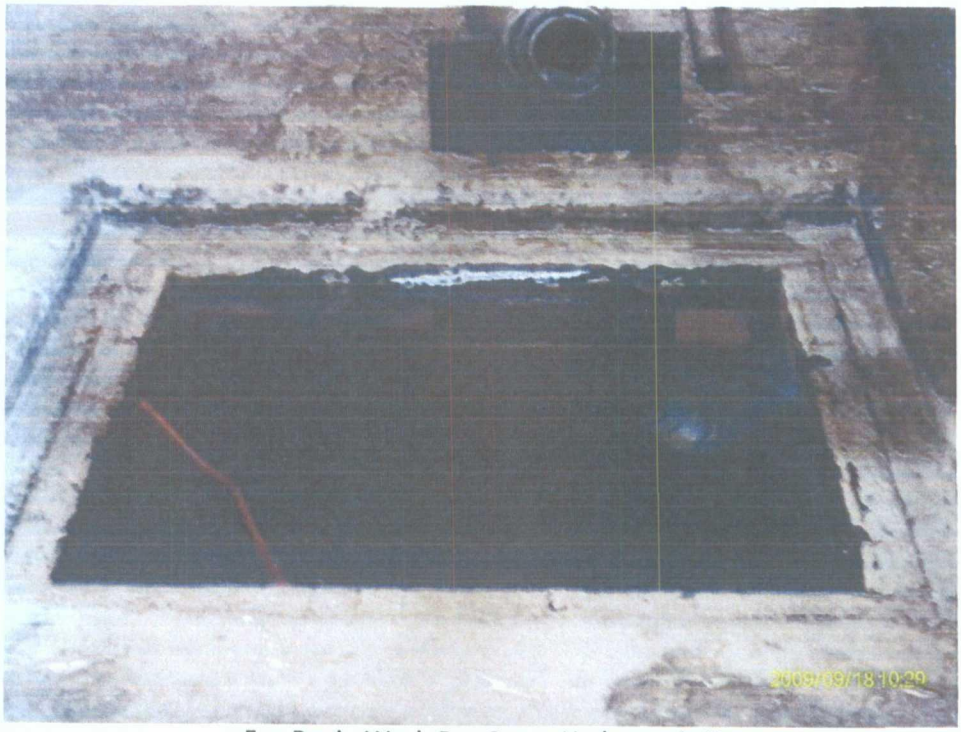


3. End South Drain Sump Hydrostatic Test.

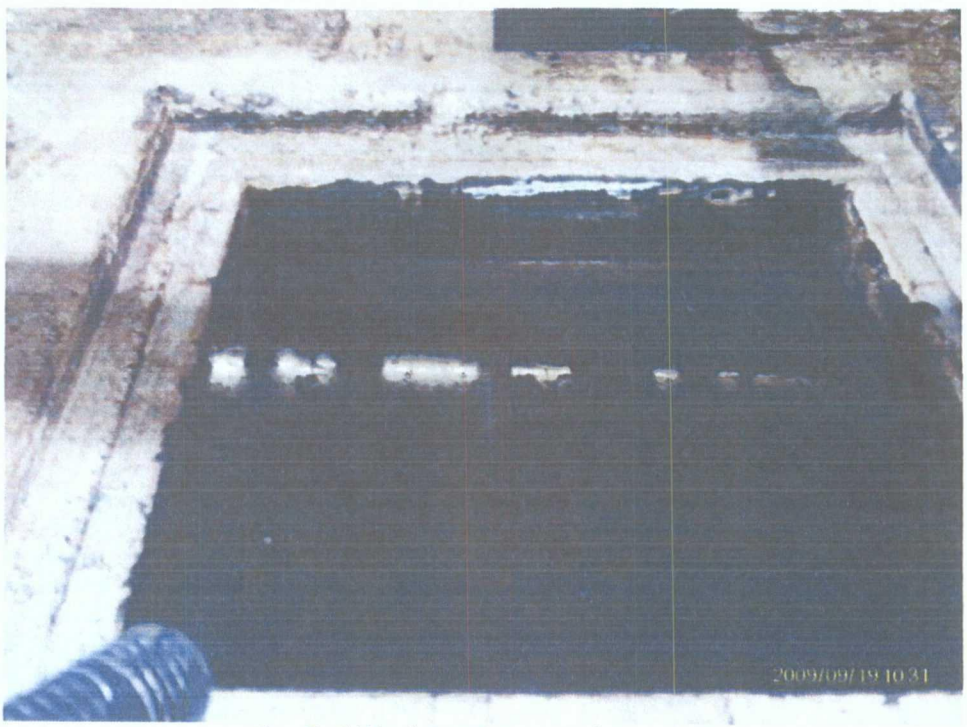


4. Wash Bay Sump after Cleaning.

Photo Documentation



5. Begin Wash Bay Sump Hydrostatic Test.



6. End Wash Bay Sump Hydrostatic Test.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, November 23, 2009 1:12 PM
To: 'Schornick, Mike'
Cc: 'Michelle Green'
Subject: Sump Closure for GW-164 Wood Group Hobbs

Mr. Schornick,

The OCD has reviewed the following submitted reports from Larson and Associates Environmental on behalf of Wood Group ESP group, Inc.

Sump Closure, dated November 12, 2009

OCD confirms that the three sumps are no considered CLOSED.

Ensure that upon the next renewal application that the updated schematic is included.

Thank you,

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
Website: http://www.emnrd.state.nm.us/ocd/

Wood Group ESP Inc.

November 12, 2009

VIA EMAIL: Leonard.Lowe@state.nm.us

Mr. Leonard Lowe
Environmental Engineer
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 88505

RE: Sump Closure
Wood Group ESP, Inc., Hobbs Test Facility (GW-164)
8426 North Dal Paso, Hobbs, New Mexico 88240

Dear Mr. Lowe:

This letter report was prepared with the assistance of Larson and Associates, Inc. (LAI) on behalf of Wood Group ESP, Inc. (WGESP) and is submitted to the New Mexico Oil Conservation Division (OCD). The report presents closure documentation for three sumps at the Hobbs Test Facility located in Unit D (NW/4, NW/4), Section 35, Township 17 South and Range 38 East, Lea County, New Mexico. The facility physical address is 8426 North Dal Paso, Hobbs, New Mexico. The geodetic location is north 32° 47' 51.0" and west 103° 7' 38.5". Figure 1 presents a location map.

Timeline of Events

August 27, 2009	OCD requested WGESP to conduct hydrostatic testing of the sumps to ensure integrity. The OCD also notified WGESP that the sumps will require upgrading to comply with its existing rules (NMAC 19.15.17.11). The upgrade would require retrofitting the sumps, following the integrity demonstration, with fiberglass liners designed to allow monitoring of leakage in the space between the fiberglass liner and concrete containment.
September 4, 2009	Conference call with the OCD, WGESP expressed a desire to retrofit two sumps, located at the drain near the south side of the building and pump cleaning area inside the test building, and close the remaining three sumps. The OCD was in agreement with the proposal and WGESP requested a list of procedures from the OCD for demonstrating sump integrity
September 14, 2009	OCD provided procedures to WGESP for hydrostatic testing and verification of sump integrity
October 15, 2009	*Sump Integrity Test Results and Closure Plan* Report was submitted to OCD for review and approval
October 21, 2009	OCD approved Sump Integrity and Closure Plan
November 3, 2009	Three sumps filled with concrete per Closure Plan

On November 3, 2009, LAI personnel, Michelle Green observed cementing of the Covered Drum Storage Area Sump, Covered East Containment Sump and the Southeast Containment Sump. Custom Mobile Concrete was contracted by Big Boys LLC to prepare the cement mixture onsite. The cement mixture was added to each sump. A pneumatically energized hand-held vibrating rod was placed in the freshly poured cement. The rod vibrated the cement mixture to remove any air pockets and push suspended gravel downward to provide a finished surface. The surface of the concrete was tamped, floated and made flush with the existing surface.

Photo documentation of the closed sumps is presented in Appendix A. An updated schematic showing the closed 'sumps' is presented in Figure 2.

Final Closure
WGESP requests closure on these concrete filled containments.

If you have any questions or require additional information I may be reached at (405) 671-2145.

Sincerely,
Wood Group ESP, Inc.

Mike Schornick, P.E.
Environmental Engineer

Cc: Sam Baron – WGESP, Midland, TX
Rod Burrola – WGESP, Hobbs, NM
Mark J. Larson – Larson & Associates, Inc.

JWW

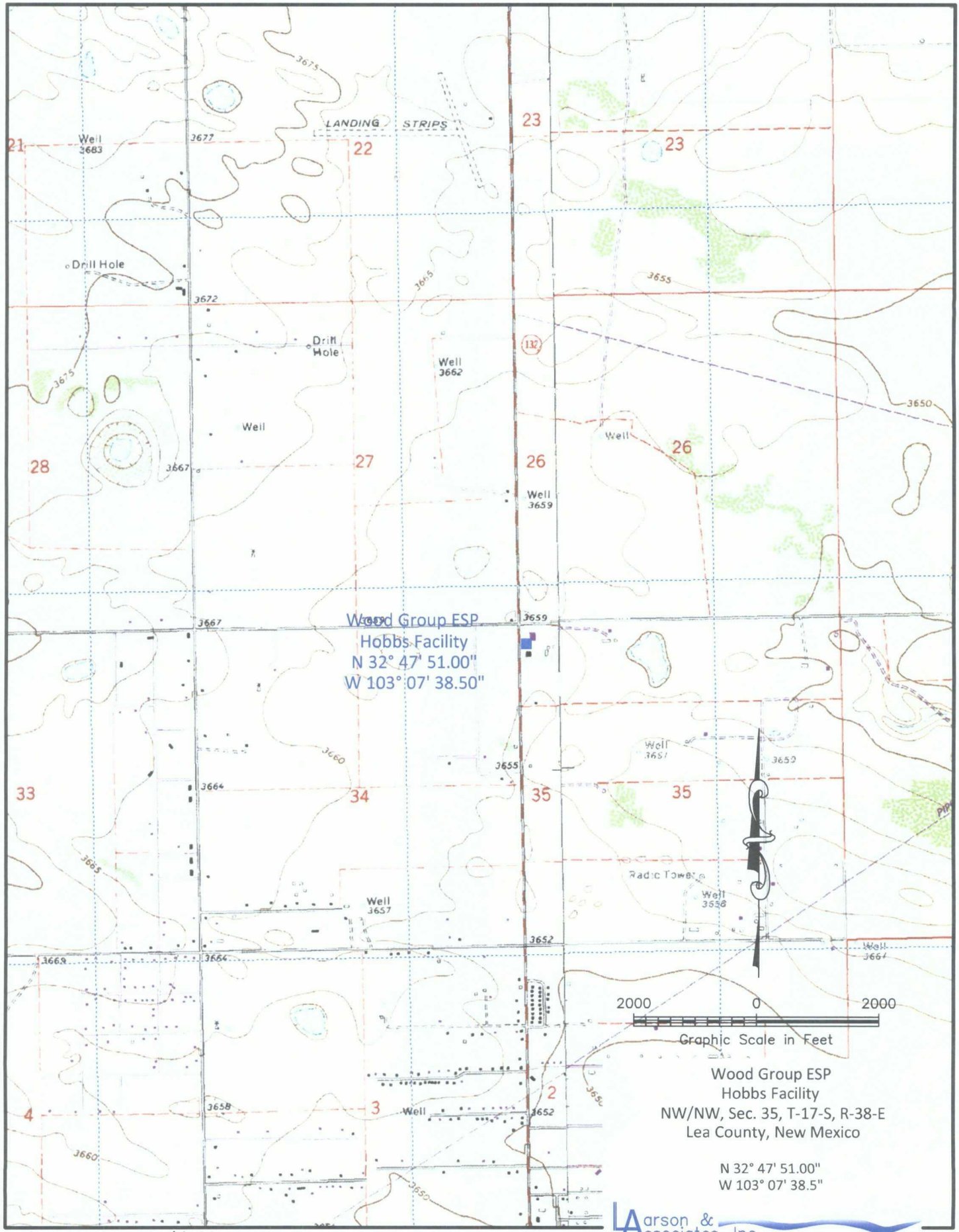


Figure 1 - Topographic Map

JWW

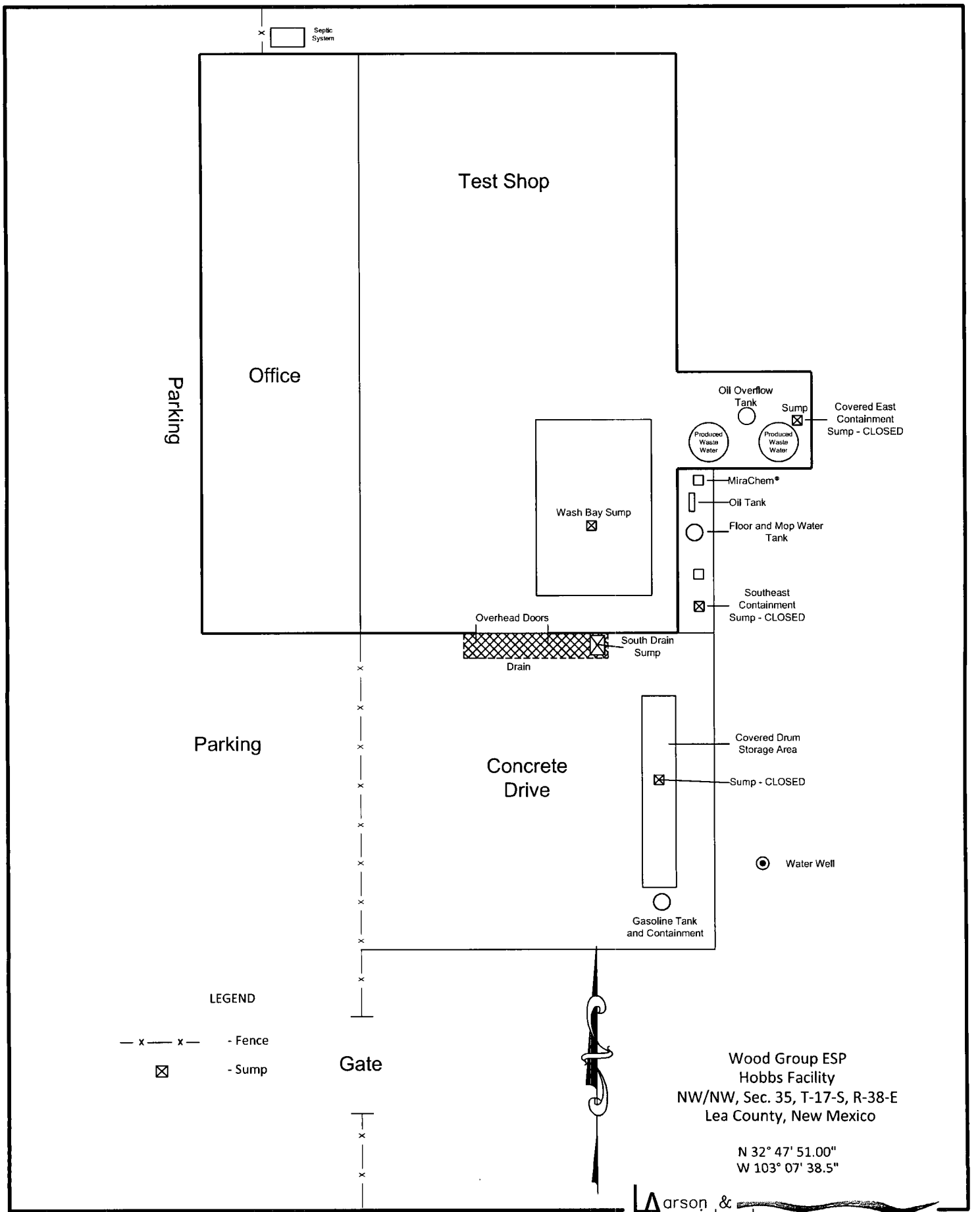
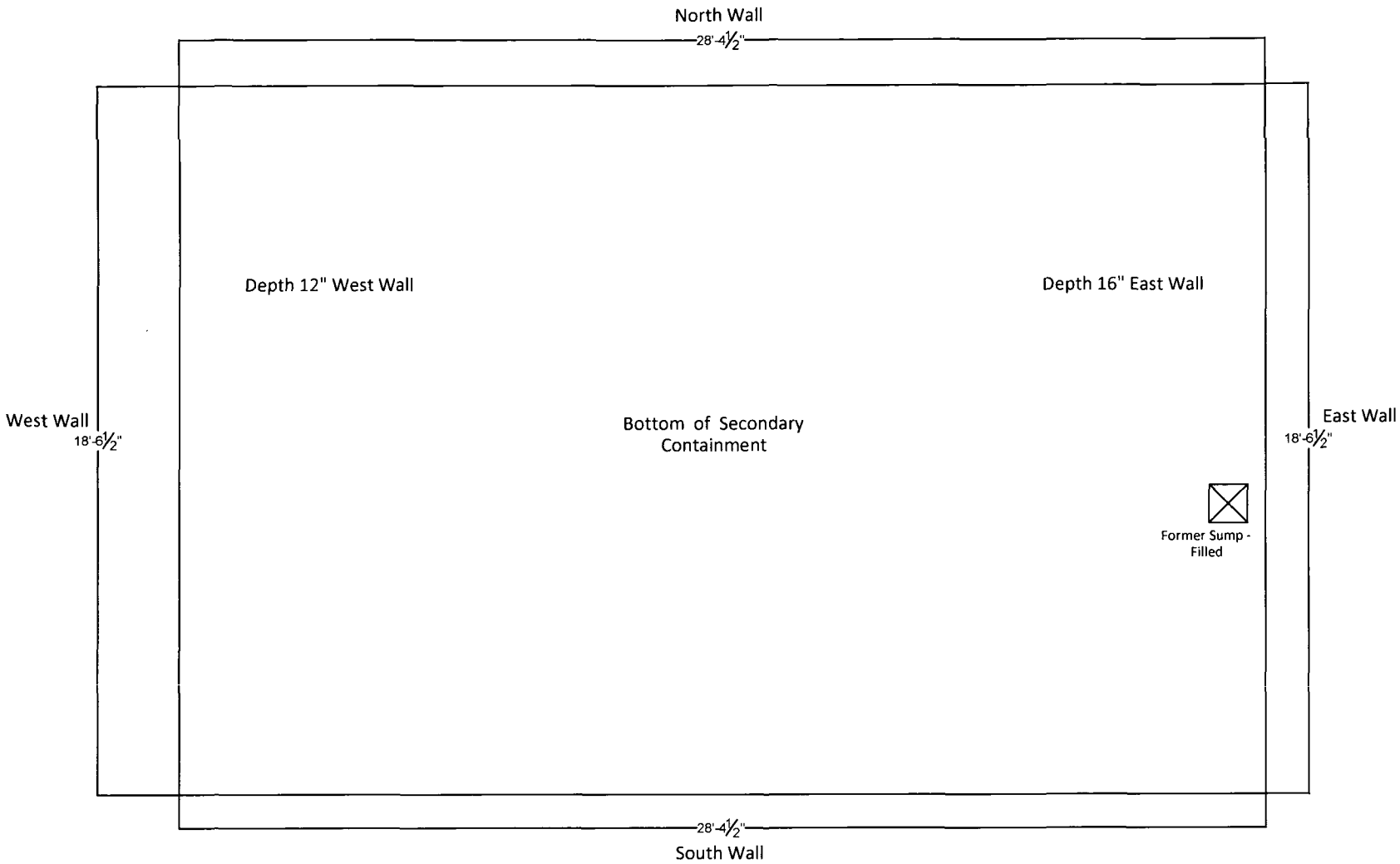


Figure 2 - Facility Drawing



Not To Scale

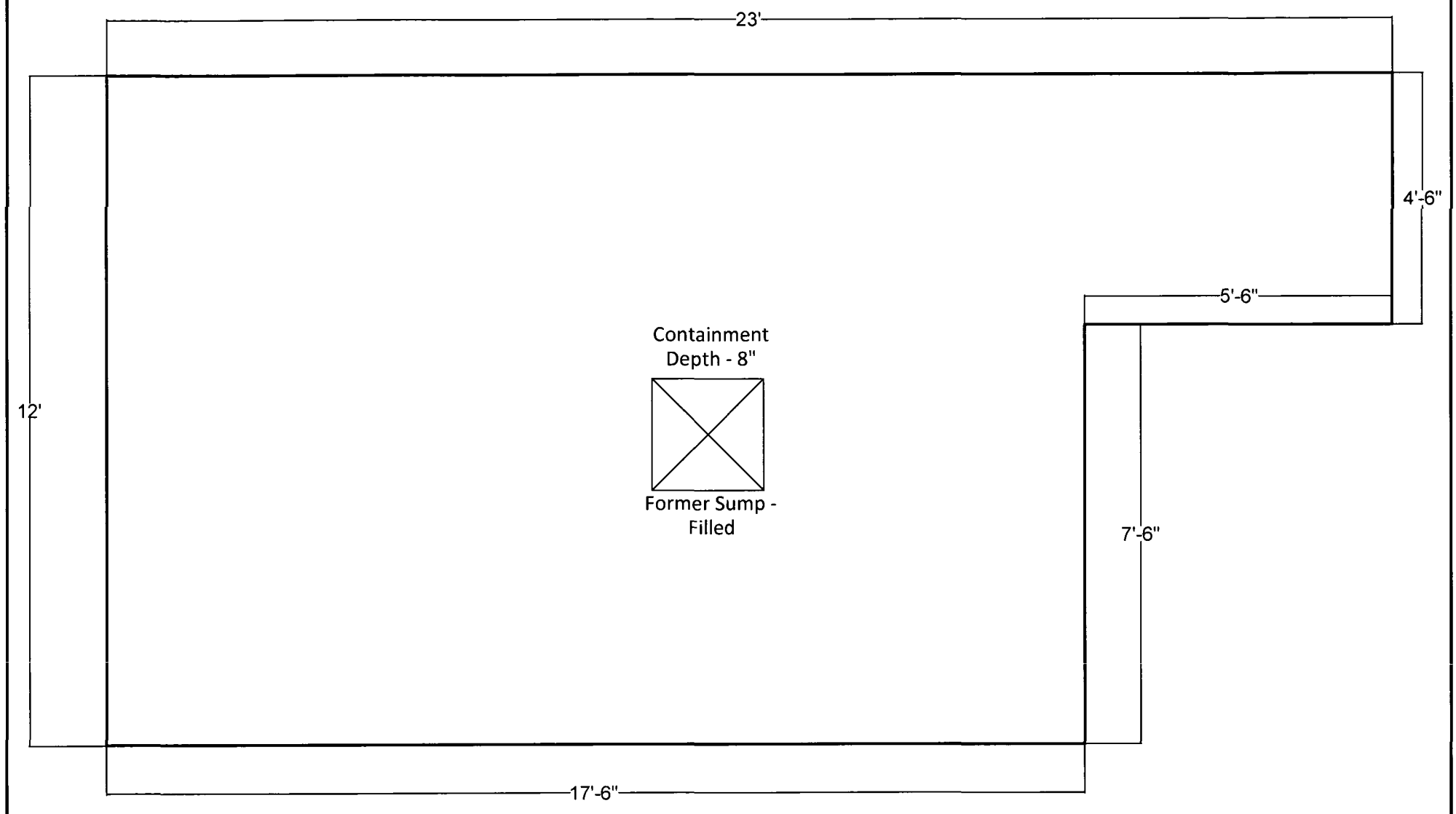
Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 3 - Covered East Containment

[redacted] JWW Y:\PROJECTS\WOODGROUP\HOBBS FACILITY\2009 Projects\8-0113-04\Hobbs Test Shop Containments.dwg, 11/12/2009 4:59:58 PM



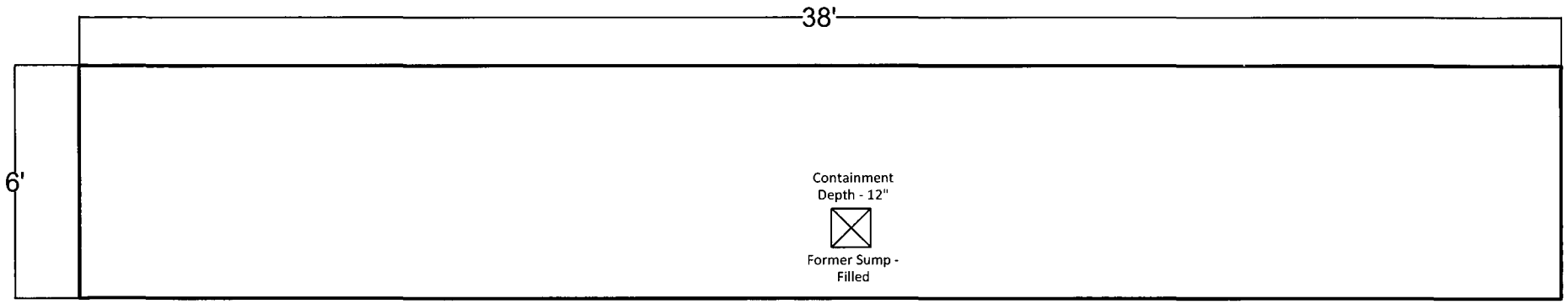
Not To Scale

Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 4 - East Containment - Uncovered



Not To Scale

Wood Group ESP
Hobbs Facility
NW/NW, Sec. 35, T-17-S, R-38-E
Lea County, New Mexico

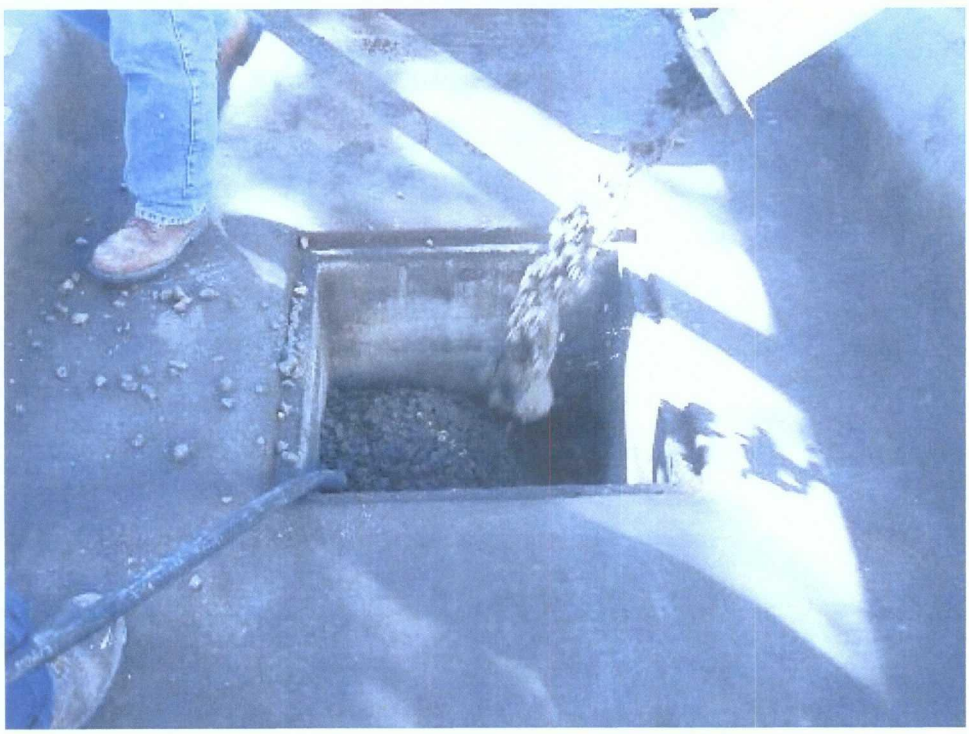
N 32° 47' 51.00"
W 103° 07' 38.5"

Larson & Associates, Inc.
Environmental Consultants

Figure 5 - Covered Drum Storage Area Sump

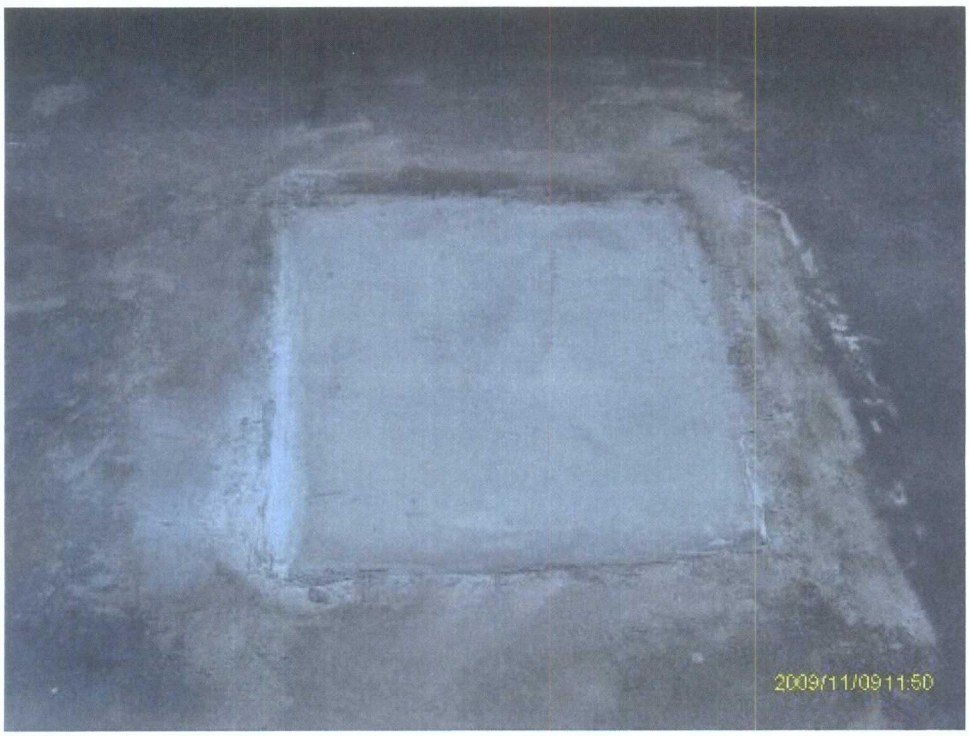
Photo Documentation

Viewing south Covered Drum Storage Containment with sump before closure.



View of the cementing the Covered Drum Storage Containment Sump.

Photo Documentation



View of former sump filled with cement in Covered Drum Storage Area.

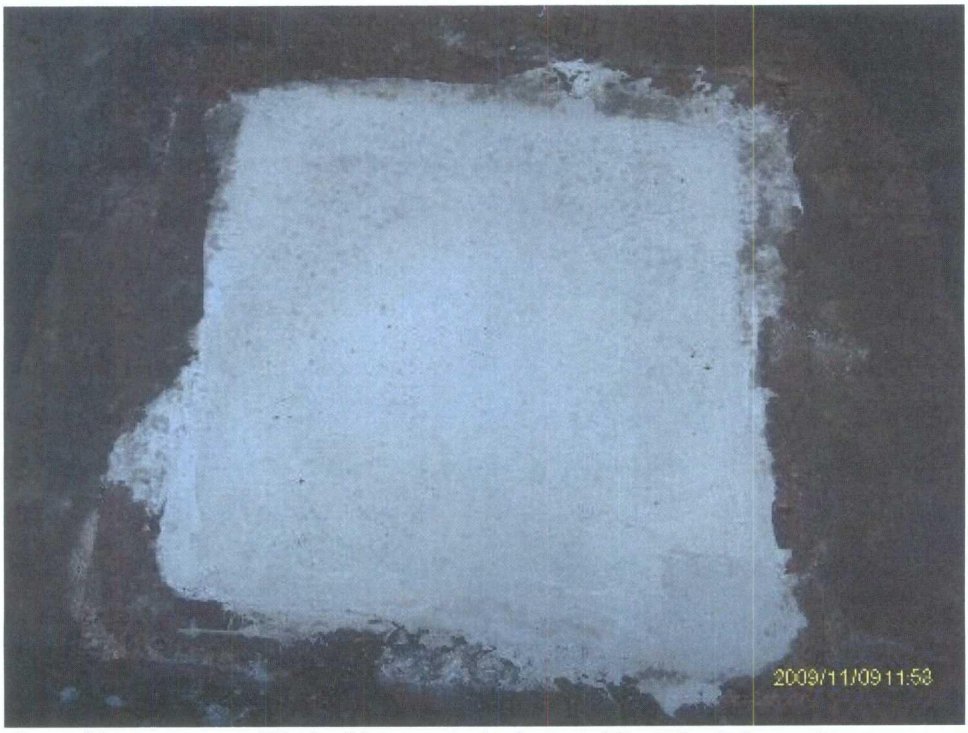
View of the Southeast Containment Sump being filled with cement.

Photo Documentation

View of former sump filled with cement in Southeast Containment.

View of the Covered East Containment Sump being filled with cement.

Photo Documentation



View of former sump filled with cement in Covered East Containment.

OCD INSPECTIONS NOTED IN CONDITION 16 OF RENEWED PERMIT GW-164

16. OCD Inspections: The OCD performed an inspection of this facility on August 27, 2009. All photographs referenced below are located in the attachment of this permit. As a result of the inspection, OCD concluded the following:

> **Photo 1 – 4:** Five sumps are being operated as below-grade tanks. OCD requires Owner/Operator to conduct an integrity test of these vessels. Owner/Operator shall submit a work plan detailing the retrofitting or removal of each vessel by **December 31, 2009**.

The overall facility is in good standing in accordance to their discharge permit conditions.

Environmental Facility Inspection

Facility Name: ESP - SERVICE FACILITY | Time Out: 10:30 | Time In: 12:00 | Hrs: 0:00

Inspector: Wayne Price | Dt Mod: 8/20/2004 | Purpose: Normal Routine Activity

Inspection Date: 01/19/2004 | Inspect No: eLWP0423351054 | Type: Field Inspection

Violations / Documentation

Addtional Violation Notes:

List Violations or Indicate Compliance:

Specific Violation
No Violations Identified - All O.K.

Documentation Acquired: ☐ Samples ☐ Statements ☐ Sketch ☐ Video ☐ Photos

Compliance Items (Checked Items Denote Non-Compliance)

Write Compliance Based on this Inspection

☐ Drums ☐ Process ☐ AG Tanks ☐ AG Saddle Tk ☐ Labeling ☐ Tanks/Sumps ☐ Permits

☐ UG Lines ☐ WD Practice ☐ Class V ☐ Housekeepin ☐ Spill Rpt ☑ Potential ENV ☐ Wtr Wells

Describe Remedial Action Required:

Main sump needs to be checked before discharge plan renewal

Use [SHIFT] + [F2] to Expand any Notes or Comment Field

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 1/27/2000 Time: 8:30 AM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☐ Brine St. ☐ OilField Service Co. ☑
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐ _____

Discharge Plan: No ☐ Yes ☑ DP# 164

FACILITY NAME: HOBBS FACILITY
PHYSICAL LOCATION: 8426 N DAL PASO HOBBS
Legal: QRT NE QRT NE Sec 35 TS 17 R 38 County LEA, NM

OWNER/OPERATOR (NAME) WOOD GROUP
Contact Person: LARRY MERWORTH Tele:#
MAILING
ADDRESS: P.O. Box 80130 MIDLAND State ~~NM~~ TX ZIP 79708
Owner/Operator Rep's: S.A.B.

OCD INSPECTORS: PRICE, FORD, ANDERSON, D WILLIAMS

1. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
DRUMS LOCATED OUTSIDE NEED PROPER CONTAINMENT
PICTURES 11, 12 & 13

2. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
VISIBLE CONTAMINATION NOTED IN SOUTH PAD AREA, DRUM STORAGE AREA EAST OF SHOP AND YARD AREA
PICTURES # 10, 13 & 14

3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

OK

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OK

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

OK

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

WILL BE A DISCHARGE PLAN REQUIREMENT

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

SAME AS # 6

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? _____ Yes _____ No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☑ NO ☐ IF NO DETAIL BELOW.

ESP USES OCD C-138 APPROVAL PROCESS

ESP USES XYLENE AND SPRAY TRICHLORETHLYENE, ESP SHOULD CHARACTERIZE TO DETERMINE IF THESE PRODUCTS WOULD CAUSE THE WASTE WATER TO BE A LISTED RCRA WASTE.

9. **Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☑ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. **Housekeeping:** All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD

11. **Spill Reporting:** All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

NO SPILLS NOTED OR OBSERVED, MINIMUS SPILLS FROM SHOP DRIVEWAY NOTED.

12. **Does the facility have any other potential environmental concerns/issues?**

OLD CONCRETE SUMP IN WASTE WATER TREATMENT AREA DO NOT HAVE SECONDARY CONTAINMENT.

13. **Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?**

- NO -

14. **ANY WATER WELLS ON SITE ?** NO ☐ YES ☑ **IF YES, HOW IS IT BEING USED ?**

OCD WILL REQUIRE WELL TO BE TESTED AS DISCHARGE PLAN CONDITION.

Miscellaneous Comments:

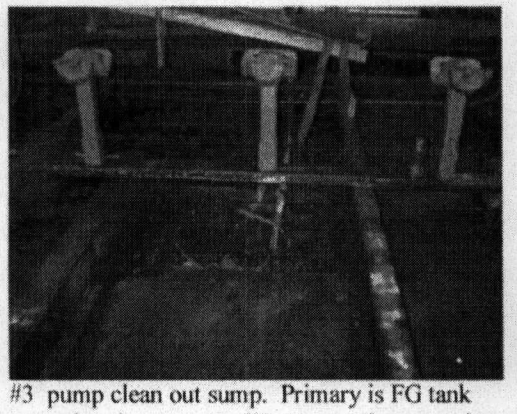
- ESP NEEDS TO RE-SUBMIT WASTE STREAM FLOW DIAGRAM
- INSTALL PAD & CURBS IN AREAS WHERE RUN-off IS OCCURING.
- ESP WILL BE REQUIRED TO SUBMIT SOIL CLEAN-UP PLAN

Number of Photos taken at this site: 14
attachments-

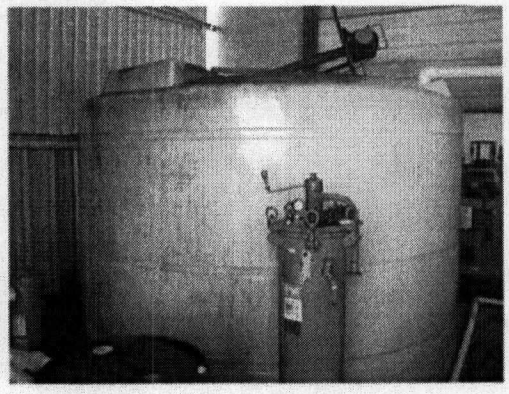
ESP-Hobbs GW-176 January 27, 2000
8:30 am-10 am By: Wayne Price

#1 ESP Sign looking NE

#2 Pump clean out area. HCL acid, & steam is used in the process.

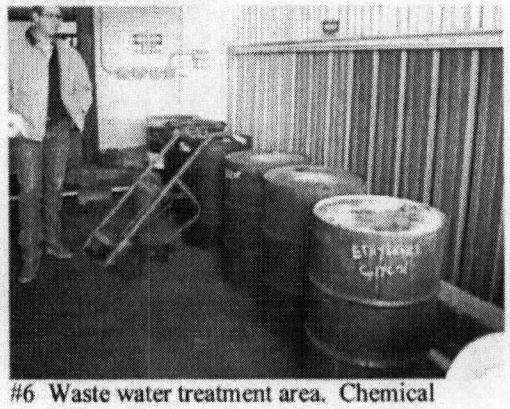


#3 pump clean out sump. Primary is FG tank secondary is concrete. Wastewater is pumped to waste water treatment area.



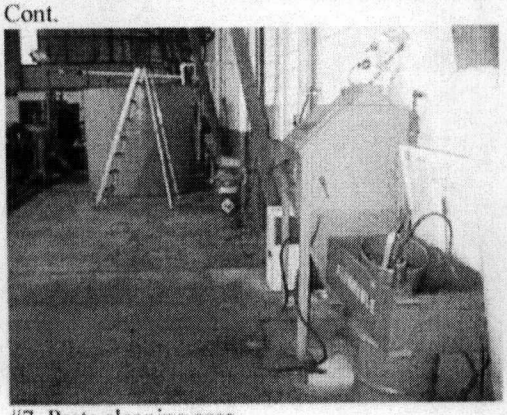
#4 Waste water treatment tank

#5 Wastewater treatment area sump is concrete construction, no secondary containment. Area is covered and bermed.

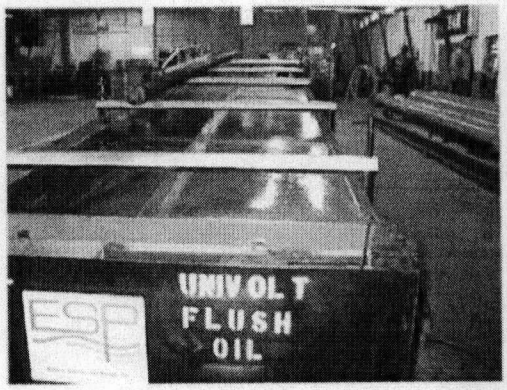


#6 Waste water treatment area. Chemical storage. Oils, Xylene, & Ethylene Glycol.

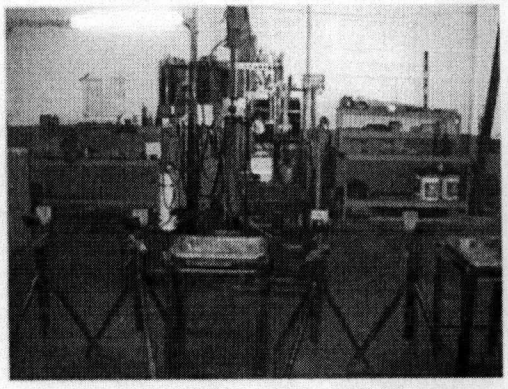
ESP-Hobbs GW-176 January 27, 2000
8:30 am-10 am By: Wayne Price
Cont.



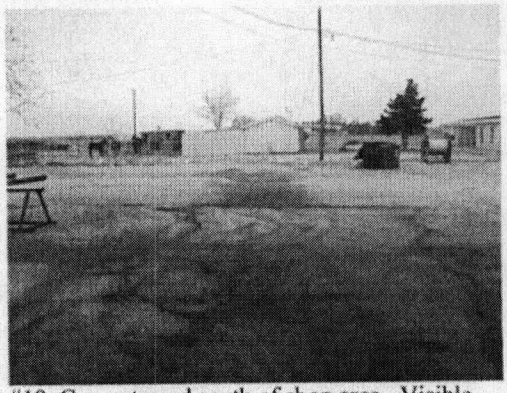
#7 Parts cleaning area.



#8 Submersible pump motor cleaning area.

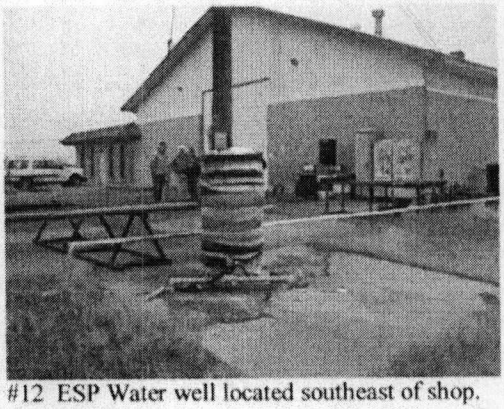


#9 Motor & Pump seal cleaning area.



#10 Concrete pad south of shop area. Visible contamination running off of pad. Picture looking south. Background shows nearby residence.

#11 Chemical drum storage.



#12 ESP Water well located southeast of shop.

ESP-Hobbs GW-176 January 27, 2000
8:30 am-10 am By: Wayne Price
Cont.

#13 Drum storage –no containment. Visible contamination on ground.

#14 ESP yard area, pump and motor storage area. Visible contamination on ground