GW - 135

PERMITS, RENEWALS, & MODS Application

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. ____ dated 11/25/08

or cash received on _____ in the amount of $ 1700.00

from Baker Hughes

for GW-135

Submitted by: Lawrence Romero Date: 12/5/08

Submitted to ASD by: Lawrence Romero Date: 12/3/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

November 12, 2008

Lacy Rosson
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

Re: Discharge Permit Renewal (GW-135)
Baker Petrolite Corporation Oil and Gas Service Company
NW/4 Section 3, Township 29 North, Range 11 West, NMPM,
San Juan County, New Mexico

Dear Ms. Rosson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **Baker Petrolite Corporation**, (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Edward Hansen of my staff at (505-476-3489) or E-mail edwardj.hanesn@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

WP:ejh

Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. ***The flat fee for an oil and gas service company is $1700.00. Please submit this amount along with the signed certification item 23. Checks should be made out to the New Mexico Water Quality Management Fund.***

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on March 15, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 22, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit: Pursuant to 20.6.2.3111 NMAC, prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the

department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (**Owner/Operator**), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

AFFIDAVIT OF PUBLICATION

Ad No. 618816

COPY OF PUBLICATION

RECEIVED
2008 NOV 10 PM 3 10

STATE OF NEW MEXICO
County of San Juan:

BOB WALLER, being duly sworn says: That he is the CLASSIFIED MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

October 16,2008

And the cost of the publication is $456.89

ON 10/20/08 Bob Waller appeared before me, whom I know personally to be the person who signed the above document.

Kristine Dellett
My Commission Expires 11/05/11

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division, (NMOCD), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW135) - Baker Petrolite Corporation, Lacy Rosson, Environmental Program Manager, 12645 West Airport Blvd., Sugar Land, TX 77748, has submitted a renewal application for the previously approved discharge plan (GW135) for their Baker Petrolite Corp. Bloomfield Facility, 100 Montana Street, located in the NW/4 section 3, Township 29 North, Range 11 West, NMPM, San Juan County, Farmington, New Mexico. Approximately 200 empty barrels are generated on site annually, which are collected and temporarily stored on impermeable surface prior to transport and disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 180 feet, with a total dissolved solids concentration of approximately 2000 to 4000 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espanol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación de Petróleo), 1220 South St. Francis Drive, Santa Fe, And New México, Dorothy Phillips, (505) 476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 6 st day of October 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Director

AVISO DE LA PUBLICACIÓN

ESTADO DE NEW MÉXICO
ENERGÍA, MINERALES Y DEPARTAMENTO DE LOS RECURSOS NATURALES
DIVISIÓN DE LA CONSERVACIÓN DE ACEITE

El aviso se da por este medio eso conforme a las regulaciones de la Comisión del control de calidad del agua de New México (20.6.2.3106 NMAC), los usos siguientes del permiso de la descarga se ha sometido al director de la división de la conservación de aceite de New México, (NMOCD), 1220 impulsión de San Francisco del S. Santa Fe, New México 87505, teléfono (505) 476-3440:

(GW135) - Baker Petrolite Corporation, Rosson de encaje, program manager ambiental, 12645 bulevares del oeste del aeropuerto, la tierra del azúcar, TX 77748, ha presentado una solicitud de la renovación para el plan previamente aprobado de la descarga (GW135) para su facilidad de Baker Petrolite Corp. Bloomfield, calle de 100 Montana situada en NW/4 la sección 3, el municipio 29 del norte, se extiende 11 del oeste, NMPM, conjado de San Juan, Farmington, New México. Aproximadamente 200 barriles vacíos se generan en sitio anualmente, que se recogen y se almacenan temporalmente en superficie impermeable antes de transporte y la disposición en una facilidad aprobada NMOCD. El agua subterránea muy probablemente que se afectará por un derramamiento, un escape o una descarga accidental está en una profundidad de aproximadamente 180 pies, con una concentración total de los sólidos en suspensión de aproximadamente 2000 a 4000 mg/l. Las direcciones del plan de la descarga cómo los productos y la basura del campo petrolífero serán manejados correctamente, almacenado y dispuesto, incluyendo cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie serán manejados para proteger el agua dulce.

El NMOCD ha determinado que el uso es administrativo completo y ha preparado un permiso del bosquejo. El NMOCD aceptará comentarios y declaraciones del interés con respecto a este uso y creará una lista de personas a quienes se mandan propaganda específica de la facilidad para las personas que desean recibir los avisos futuros. Las personas interesadas en la obtención de la información adicional, someter comentarios o la petición para estar en una lista de personas a quienes se mandan propaganda específica de la facilidad para los avisos futuros pueden entrar en contacto con al jefe de oficina ambiental de la división de la conservación de aceite en la dirección dada arriba. El permiso administrativo de la determinación y del bosquejo de lo completo se puede ver en la dirección antedicha entre el 8:00 mañana y el 4:00 P.M., de lunes a viernes, o se puede también ver en el Web site http://www.emnrd.state.nm.us/ocd/ de NMOCD. Las personas interesadas en la obtención de una copia del uso y del permiso del bosquejo pueden entrar en contacto con el NMOCD en la dirección dada arriba. Antes de la decisión en cualquier permiso propuesto de la descarga o modificación importante, el director dará un plazo de un período por lo menos de treinta (30) días después de la fecha de la publicación de este aviso, durante la cual las personas interesadas pueden someter comentarios o pedir que asimiento de NMOCD una vista pública. Los pedidos una vista pública dispondrán las razones por las que una audiencia debe ser llevada a cabo. Una audiencia será llevada a cabo si el director determina que hay interés público significativo.

Si no se lleva a cabo ninguna vista pública, el director aprobará o desaprobará el permiso propuesto basado en la información disponible, incluyendo todos los comentarios recibidos. Si se lleva a cabo una vista pública, el director aprobará o desaprobará el permiso propuesto basado en la información en el uso del permiso y la información presentada en la audiencia.

del en del solicitud del esta del sol del información de los?Ol espan del más del obtener de Para, favor del del comunicarse del sirvase: Energía de New México, minerales y departamento de los recursos naturales (Depto. Del Energía, minerales y Recursos Naturales de Nuevo México), división de la conservación de aceite (Depto. Conservación Del Petróleo impulsión del sur) 1220 del St. Francisco, Santa y nuevo México, (Contacto: Dorothy Phillips, (505)-476-3461)

DADO bajo sello de la Comisión de conservación de aceite de New México en Santa Fe, New México, en esto día del st 6 del octubre de 2008.

ESTADO DE NEW MÉXICO
DIVISIÓN DE LA CONSERVACIÓN DE ACEITE Mark Fesmire, Director

THE DAILY TIMES
FARMINGTON, NEW MEXICO
THE FOUR CORNERS INFORMATION LEADER

PO Box 450 Farmington, NM 87499

Date: 10/15/08

NM ENERGY, MINERALS & NATURA

NM ENERGY, MINERALS & NA
1220 SOUTH ST. FRANCIS DR.
SANTA FE, NM 87505
(505) 476-3400

Ad#	Publication	Class	Start	Stop	Times	AS/400 Acct
1001088666	FARMINGTO	0152 - Legal Notices	10/10/2008	10/10/2008	1	780352
1001088666	FARMINGTO	0152 - Legal Notices	10/10/2008	10/10/2008	1	780352

Total Cost:	$164.34
Payment:	$0.00
Balance Due:	$164.34

TEXT:

NOTICE OF PUBLICATIONSTATE OF NEW MEXICOENERGY, MINERALS AND NAT

O.K. to pay
Edward J. Hansen
10-27-08

GW-135

Please include Ad number on your payment.

AFFIDAVIT OF PUBLICATION

Ad No. 60761

STATE OF NEW MEXICO
County of San Juan:

BOB WALLER, being duly sworn says: That he is the CLASSIFIED MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Friday October 10, 2008

And the cost of the publication is $164.34

ON 10/15/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

Christine Gallegos

My Commission expires November 05, 2011

COPY OF PUBLICATION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacion Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October

2008.STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
SEAL Mark Fesmire, Director

Legal No. 60761 published in The Daily Times, Farmington, New Mexico on Friday October 10, 2008

THE SANTA FE
NEW MEXICAN
Founded 1849

RECEIVED
2008 OCT 21 PM 2 30

NMEMNRD Oil Conservation
Edward Hansen
1220 S. St. Francis Drive
Santa Fe, NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00270323 ACCOUNT: 00002212
LEGAL NO: 86111 P.O. #: 52100-0000018
201 LINES 1 TIME(S) 174.72
AFFIDAVIT: 7.00
TAX: 14.42
TOTAL: 196.14

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 86111 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/10/2008 and 10/10/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 10th day of October, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

O.k. to pay
Edward J. Hansen
10-23-08

/S/ L. Paquin
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 13rd day of October, 2008

Notary Pamela Anne Beach

Commission Expires: May 31, 2011

OFFICIAL SEAL
Pamela Anne Beach
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 5-31-11

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espan_ol, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservácio n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461).

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L
Mark Fesmire,
Director
Pl No. 86111
Oct. 10, 2008.

Hansen, Edward J., EMNRD

From: Blackwater, Patricia [pblackwater@daily-times.com]
Sent: Tuesday, October 07, 2008 2:10 PM
To: Hansen, Edward J., EMNRD
Subject: RE: GW135 Discharge Permit Public Notice - Farmington Daily Times
Attachments: Blackwater, Patricia.vcf

Edward,

Good Afternoon, I have completed your request. I scheduled your legal to publish on Friday October 10, 2008. The net cost of your ad is $164.34

Thank you & have a wonderful evening.

Sign,
Patricia Blackwater
Legals/Classifieds Representative
The Farmington Daily Times
P.O. Box 450
Farmington, NM 87401
(505) 325-4545
1-800-395-6397
Direct: (505) 564-4564
Fax: (505) 564-4567
pblackwater@daily-times.com
legals@daily-times.com

From: FAR LEGALS
Sent: Tuesday, October 07, 2008 12:42 PM
To: Blackwater, Patricia
Subject: FW: GW135 Discharge Permit Public Notice - Farmington Daily Times

Patricia Blackwater
Legals/Classifieds Representative
The Farmington Daily Times
P.O. Box 450
Farmington, NM 87401
(505) 325-4545
1-800-395-6397
Direct: (505) 564-4564
Fax: (505) 564-4567
pblackwater@daily-times.com
legals@daily-times.com

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Monday, October 06, 2008 2:33 PM
To: FAR LEGALS
Subject: GW135 Discharge Permit Public Notice - Farmington Daily Times

Dear Sir or Madam:

Please publish the attached notice(s) once in the classified-legal notice section of the newspaper. The Oil Conservation Division (OCD) PO # is **52100-0000013760** and Account # 780352 (account # included for your use only). Please mail an affidavit of proof of publication for the notice. Please contact me if you have questions. Thank you.
The Oil Conservation Division appreciates the ad placement services that you provide to our agency. In order to streamline the review and approval process for newspaper ad invoices, the OCD requests that you send the original invoice with an original affidavit of proof of posting directly to the OCD requestor (contact info. usually at the bottom of e-mails or letters). This will help the proper OCD staff person responsible for the ad placement to promptly receive invoices from newspaper companies and quickly approve invoices for payment.

The OCD appreciates your cooperation and we look forward to working with you in the future. Please contact me if you have questions or need further assistance in this matter.

Edward J. Hansen
Oil Conservation Division
EMNRD
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

505-476-3489


Image © 2008 DigitalGlobe
Google
36°45'18.50" N 107°58'45.88" W elev 5712 ft Mar 26, 2007 Eye alt 6257 ft

Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
P: (505) 476-3440
F: (505) 476-3462

Applications, Draft Permits, Public Notices and Notification List

(NOTE: ALL DOCUMENTS POSTED IN PDF FORMAT)

Notification List

List of Rule 19 and WQCC Interested Parties (12/02/05)

Applications (Recently Filed and Deemed Administratively Complete.)

APPLICANT	PERMIT NUMBER (IF FOR RENEWAL)	FACILITY NAME	DATE FILED

Draft Permits and Public Notices

NOTE: FOR NEW APPLICATIONS, DRAFT PERMITS MAY NOT BE AVAILABLE UNTIL PUBLIC NOTICE PERIOD HAS EXPIRED.

SPANISH LANGUAGE PUBLIC NOTICE

BAKER PETROLITE CORPORATION (10/6/08) Bloomfield Oil and Gas Service Facility (GW-135) Draft Permit, Public Notice, Administrative Completeness

EL PASO NATURAL GAS COMPANY (9/30/08) EPNG Pipeline L30131 and EPNG Pipeline L30148 (HIP-113) Draft Permit, Public Notice, Administrative Completeness

WILLIAMS FOUR CORNERS (9/24/08) Martinez Draw Compressor Station (GW-308) Draft Permit, Public Notice, Administrative Completeness

WILLIAMS FOUR CORNERS (9/24/08) Quintana Mesa Compressor Station (GW-309) Draft Permit, Public Notice, Administrative Completeness

WILLIAMS FOUR CORNERS (9/24/08) North Crandell Compressor Station (GW-310) Draft Permit, Public Notice, Administrative Completeness

PUBLIC SERVICE COMPANY OF NEW MEXICO (9/18/08) Santa Fe Replacement Pipeline (HIP-110) Draft Permit, Public Notice, Administrative Completeness

EL PASO NATURAL GAS COMPANY (9/18/08) Deming Compressor Station (GW-147) Draft Permit, Public Notice, Administrative Completeness

KNIGHT FISHING SERVICES (9/10/08) Hobbs Service Facility (GW-381) Draft Permit, Public Notice, Administrative Completeness

CAPITAN CHEMICAL, LLC (9/4/08) Hobbs Service Facility (GW-384) Draft Permit, Public Notice, Administrative Completeness

SOUTHERN UNION GAS SERVICES , LTD. (9/4/08) Adobe Compressor Station (GW-377) Draft Permit, Public Notice, Administrative Completeness

HYDROSTATIC PIPE SERVICE, INC. (9/4/08) Hobbs Service Facility (GW-276) Draft Permit, Public Notice, Administrative Completeness

SCHLUMBERGER TECHNOLOGY CORPORATION (8/26/08) Farmington Service Facility (GW-100) Draft Permit, Public Notice, Administrative Completeness

HESS CORPORATION (8/21/08) West Bravo Dome Carbon Dioxide Transmission Line (HIP-112) Draft Permit, Public Notice, Administrative Completeness

BP AMERICA PRODUCTION COMPANY (8/13/08) Gallegos Canyon Compressor Station (GW-88)

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, October 06, 2008 2:33 PM
To: 'FAR LEGALS'
Subject: GW135 Discharge Permit Public Notice - Farmington Daily Times
Attachments: GW135 Public Notice 10-6-08.DOC

Dear Sir or Madam:

Please publish the attached notice(s) once in the classified-legal notice section of the newspaper. The Oil Conservation Division (OCD) PO # is **52100-0000013760** and Account # 780352 (account # included for your use only). Please mail an affidavit of proof of publication for the notice. Please contact me if you have questions. Thank you.
The Oil Conservation Division appreciates the ad placement services that you provide to our agency. In order to streamline the review and approval process for newspaper ad invoices, the OCD requests that you send the original invoice with an original affidavit of proof of posting directly to the OCD requestor (contact info. usually at the bottom of e-mails or letters). This will help the proper OCD staff person responsible for the ad placement to promptly receive invoices from newspaper companies and quickly approve invoices for payment.

The OCD appreciates your cooperation and we look forward to working with you in the future. Please contact me if you have questions or need further assistance in this matter.

Edward J. Hansen
Oil Conservation Division
EMNRD
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

505-476-3489

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, October 06, 2008 2:32 PM
To: 'Legals'
Subject: GW135 Discharge Permit Public Notice - SF New Mexican
Attachments: GW135 Public Notice 10-6-08.DOC

Dear Sir or Madam:

Please publish the attached notice(s) once in the classified-legal notice section of the newspaper. The Oil Conservation Division (OCD) PO # is **52100-0000013759** and Account # 56689 (account # included for your use only). Please mail an affidavit of proof of publication for the notice. Please contact me if you have questions. Thank you.
The Oil Conservation Division appreciates the ad placement services that you provide to our agency. In order to streamline the review and approval process for newspaper ad invoices, the OCD requests that you send the original invoice with an original affidavit of proof of posting directly to the OCD requestor (contact info. usually at the bottom of e-mails or letters). This will help the proper OCD staff person responsible for the ad placement to promptly receive invoices from newspaper companies and quickly approve invoices for payment.

The OCD appreciates your cooperation and we look forward to working with you in the future. Please contact me if you have questions or need further assistance in this matter.

Edward J. Hansen
Oil Conservation Division
EMNRD
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

505-476-3489

STATE OF NEW MEXICO
ENERGY MINERALS AND
NATURAL RESOURCES DEPARTMENT
1220 SOUTH SAINT FRANCIS DRIVE
SANTA FE, NEW MEXICO 87505

sent via U.S. Mail

RECEIVED
OCT - 6 2008
Environmental Bureau
Oil Conservation Division

4

Field Supervisor
US Fish & Wildlife Service
2105 Osuna Road, Northeast
Albuquerque, NM 87113-1001

STATE OF NEW MEXICO
ENERGY MINERALS AND
NATURAL RESOURCES DEPARTMENT
1220 SOUTH SAINT FRANCIS DRIVE
SANTA FE, NEW MEXICO 87505

State Historic Preservation Officer
228 East Palace Avenue
Villa Rivera Room 101
Santa Fe, NM 87503

STATE OF NEW MEXICO
ENERGY MINERALS AND
NATURAL RESOURCES DEPARTMENT
1220 SOUTH SAINT FRANCIS DRIVE
SANTA FE, NEW MEXICO 87505

Dr. Harry Bishara
P.O. Box 748
Cuba, NM 87013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD

Sent: Monday, October 06, 2008 2:31 PM

To: Thompson, Bruce C., DGF; Wunder, Matthew, DGF; Warren, Alvin, DIA; Kiger, Stephanie P, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda_Rundell@nm.blm.gov'; 'psisneros@nmag.gov'; 'lsouthard@nmag.gov'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'sreid@nmoga.org'; Fetner, William, NMENV; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; Kieling, John, NMENV; 'bsg@garbhall.com'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'staff@ipanm.org'; Johnson, Larry, EMNRD; Gum, Tim, EMNRD; Bratcher, Mike, EMNRD; Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD; Martin, Ed, EMNRD; 'dseawright@gmail.com'; 'jharris@rwdhc.com'

Subject: GW-135 Discharge Permit Renewal - Public Notice

Attachments: GW135 Public Notice 10-6-08.pdf

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, October 06, 2008 2:31 PM
To: 'Rosson, Lacy'
Subject: Discharge Permit (GW-135) Renewal Application Administratively Complete
Attachments: GW135_AdminCompLetter10-6-08.pdf; GW135 DRAFT PERMIT Renewal 10-6-08.pdf; GW135 Public Notice 10-6-08.pdf

Dear Ms. Rosson:

The submitted discharge permit (GW-135) application for the Baker Petrolite Corporation – Bloomfield Facility has been determined to be **administratively complete**.

I have attached the **Administratively Complete Letter**, **Draft Permit**, and **OCD Public Notice** for your records. The Administratively Complete Letter has also been sent to you via U.S. Mail.

Please see the Administratively Complete Letter for instructions for the public notice you are required to give.

Let me know if you have any questions regarding this matter.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 6, 2008

Lacy Rosson
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

RE: Discharge Permit (GW-135) Renewal
Baker Petrolite Corporation – Bloomfield Facility
San Juan County, New Mexico
Determination of Administratively Complete

Dear Ms. Rosson:

The New Mexico Oil Conservation Division (OCD) has received the Baker Petrolite Corporation application, dated February 22, 2008, to renew the discharge permit, GW-135, for the Baker Petrolite Corporation – Bloomfield Facility in the NW/4 of Section 3, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The application was received on February 22, 2008, and the filing fee was received on May 23, 2008. The application and a follow-up correspondence, which proposed the newspaper to publish the public notice, provided the required information in order to deem the application "administratively" complete.

Now that the submittal is deemed "administratively" complete, the New Mexico Water Quality Control Commission regulations (WQCC) public notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD hereby approves your submitted draft version of the public notice for translation into Spanish and publication in the specified newspaper in both English and Spanish.

The public notice must be given no later than November 5, 2008. Once the notice has been given, then please submit to the OCD within 15 days of public notice:

1) proof that the notice was published in the newspaper in both English and Spanish (affidavit of publication from the newspaper) (the notice must be published as a **display ad** and not in the legal or classified ad section) and
2) proof that the notice was sent via certified mail to each landowner [signed certified mail receipt (green card) by each landowner – *this is not required if you are the landowner*].

If you have any questions regarding this matter, please do not hesitate to contact me at (505) 476-3489 or edwardj.hansen@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit renewal review.

Sincerely,

Edward J. Hansen

Edward J. Hansen
Hydrologist
Environmental Bureau

EJH:ejh

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-135) – Baker Petrolite Corporation, Lacy Rosson, Environmental Program Manager, 12645 West Airport Blvd., Sugar Land, TX 77748, has submitted a renewal application for the previously approved discharge plan (GW-135) for their Baker Petrolite Corp. Bloomfield Facility, 100 Montana Street, located in the NW/4 section 3, Township 29 North, Range 11 West, NMPM, San Juan County, Farmington, New Mexico. Approximately 200 empty barrels are generated on site annually, which are collected and temporarily stored on impermeable surface prior to transport and disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 180 feet, with a total dissolved solids concentration of approximately 2000 to 4000 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 6, 2008

Lacy Rosson
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

Re: **DRAFT** Discharge Permit Renewal (GW-135)
Baker Petrolite Corporation Oil and Gas Service Company
NW/4 Section 3, Township 29 North, Range 11 West, NMPM
San Juan County, New Mexico

Dear Ms. Rosson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **Baker Petrolite Corporation**, (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

The final permit should be issued in approximately 45 days. If you have any questions, please contact Edward Hansen of my staff at (505-476-3489) or E-mail edwardj.hanesn@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. ***The flat fee for an oil and gas service company is $1700.00. Please submit this amount along with the signed certification item 23. Checks should be made out to the New Mexico Water Quality Management Fund.***

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on March 15, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 22, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-

approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in

secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that

inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit: Pursuant to 20.6.2.3111 NMAC, prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

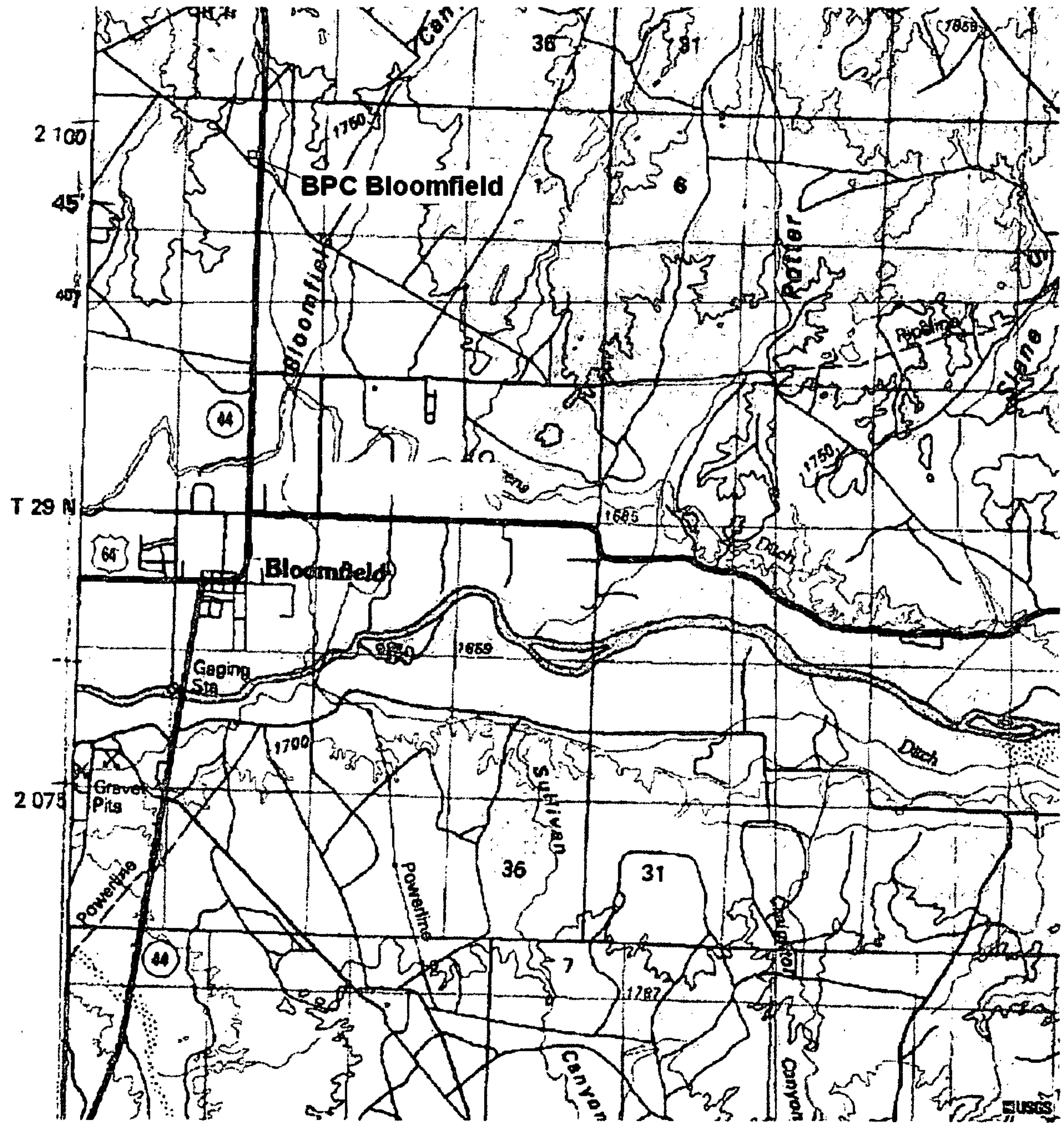
_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____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Hansen, Edward J., EMNRD

From: Henderson, Michael S [Michael.Henderson2@bakerpetrolite.com]
Sent: Wednesday, October 01, 2008 1:30 PM
To: Hansen, Edward J., EMNRD
Subject: RE: GW135 Additional Information

Attachments: Scan001.pdf

Scan001.pdf (264 KB)

Sorry about that. Here is the corrected one.

Michael S. Henderson
Baker Petrolite
Environmental Specialist, HSE Q&RA
Phone: (281) 276-5684

-----Original Message-----
From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Wednesday, October 01, 2008 2:18 PM
To: Henderson, Michael S
Subject: RE: GW135 Additional Information

Michael,
We are very close now - could you please edit your map to read "BPC Bloomfield" and then send back to me.
Thanks.

-----Original Message-----
From: Henderson, Michael S
[mailto:Michael.Henderson2@bakerpetrolite.com]
Sent: Wednesday, October 01, 2008 12:36 PM
To: Hansen, Edward J., EMNRD
Cc: Kaulen, Mark A; Rosson, Lacy
Subject: RE: GW135 Additional Information

Hope this is what you need.

Thanks,

Michael S. Henderson
Baker Petrolite
Environmental Specialist, HSE Q&RA
Phone: (281) 276-5684

-----Original Message-----
From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Wednesday, October 01, 2008 11:46 AM
To: Rosson, Lacy
Cc: Kaulen, Mark A; Henderson, Michael S
Subject: GW135 Additional Information

Lacy,
I have received the additional information that you sent last week. The information looks good. However, I still need a topo map with the correct location of the facility.
Attached is an example map with the correct location indicated.
Please submit a "new" topo map to me a.s.a.p.

I will deem the application complete once I have received the new map.

Let me know if you have any questions regarding this matter.
Thanks

Edward J. Hansen
Hydrologist
Environmental Bureau
Oil Conservation Division
505-476-3489

-----Original Message-----
From: Rosson, Lacy [mailto:Lacy.Rosson@bakerpetrolite.com]
Sent: Friday, September 19, 2008 1:02 PM
To: Hansen, Edward J., EMNRD
Cc: Kaulen, Mark A; Henderson, Michael S
Subject: FW: Scan from a Xerox WorkCentre Pro

Mr. Hansen, please accept this extension request on behalf of Baker Petrolite. Thank you.

Lacy Rosson, CHMM
Environmental Programs Manager
281-275-7354
-----Original Message-----
From: 104XEWC245@bakerhughes [mailto:104XEWC245@bakerhughes]
Sent: Friday, September 19, 2008 2:03 PM
To: Rosson, Lacy
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [104XEWC245@bakerhughes]
Number of Images: 1
Attachment File Type: PDF

WorkCentre Pro Location: machine location not set Device Name: XRX0000AA6ECC89

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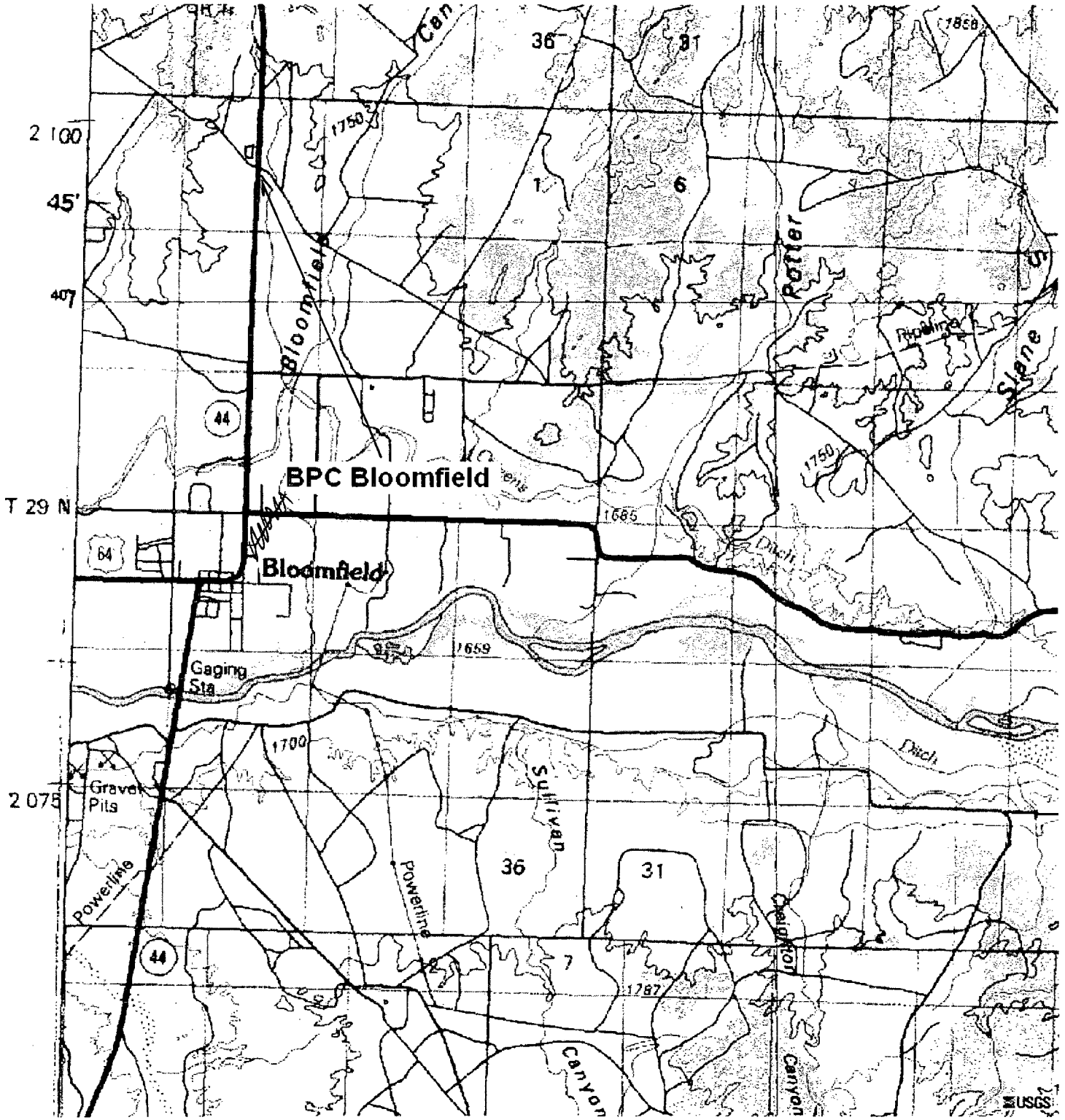
This inbound email has been scanned by the MessageLabs Email Security System.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Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Friday, September 19, 2008 1:22 PM
To: 'Rosson, Lacy'
Subject: GW-135 AI submittal extension

Dear Ms. Rosson:

The New Mexico Oil Conservation Division (NMOCD) has reviewed your request for extension of submittal of additional information for the renewal application for discharge permit GW-135. The OCD hereby approves the request for extension of the submittal of additional information until Thursday, September 25, 2008.

Also, please be advised that NMOCD approval of this extension for submittal does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

-----Original Message-----
From: Rosson, Lacy [mailto:Lacy.Rosson@bakerpetrolite.com]
Sent: Friday, September 19, 2008 1:02 PM
To: Hansen, Edward J., EMNRD
Cc: Kaulen, Mark A; Henderson, Michael S
Subject: FW: Scan from a Xerox WorkCentre Pro

Mr. Hansen, please accept this extension request on behalf of Baker Petrolite. Thank you.

Lacy Rosson, CHMM
Environmental Programs Manager
281-275-7354
-----Original Message-----
From: 104XEWC245@bakerhughes [mailto:104XEWC245@bakerhughes]
Sent: Friday, September 19, 2008 2:03 PM
To: Rosson, Lacy
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [104XEWC245@bakerhughes]
Number of Images: 1
Attachment File Type: PDF

WorkCentre Pro Location: machine location not set
Device Name: XRX0000AA6ECC89

For more information on Xerox products and solutions, please visit http://www.xerox.com

Baker Petrolite

12645 West Airport Blvd.
Sugar Land, Texas 77478
P.O. Box 5050
Sugar Land, Texas 77487-5050
Tel 281-276-5400
Fax 281-275-7385
www.bakerhughes.com

September 19, 2008

Edward Hansen
Oil Conservation Division
State of New Mexico

RE: Baker Petrolite Corporation Permit Number GW-135

Dear Mr. Hansen;

I would like to formally request an extension for the changes needed to Baker Petrolite Corporation's permit renewal GW-135. Please allow until September 25, 2008 to have these changes updated and resubmitted. If you have any questions, please feel free to contact me at 281-275-7354.

Thank you,
Baker Petrolite Corporation

Lacy Rosson
Environmental Programs Manager

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, September 17, 2008 5:00 PM
To: 'Rosson, Lacy'
Cc: Kaulen, Mark A; Henderson, Michael S
Subject: RE: New Mexico OCD Discharge Permit (GW-135)

Lacy,
Let's make this an official extension for submittal of additional information for the discharge permit (GW-135) renewal application until Thursday, September 25, 2008.

Edward J. Hansen
Hydrologist
Environmental Bureau
Oil Conservation Division
505-476-3489

P.S.: Hope things get back to normal soon.

From: Rosson, Lacy [mailto:Lacy.Rosson@bakerpetrolite.com]
Sent: Wednesday, September 17, 2008 6:00 AM
To: Hansen, Edward J., EMNRD
Cc: Kaulen, Mark A; Henderson, Michael S
Subject: New Mexico OCD

Mr. Hansen – I apologize for not getting this to you, but the Houston area has taken a pretty hard hit from Hurricane Ike. Many parts of the city are still without power, and our office has been closed since last Thursday. Mark, Mike and I will work this week on getting this info to you, but I highly doubt it will be tomorrow. please let me know if you have questions. Thanks

Thanks,

Lacy Rosson, CHMM

Baker Petrolite

Environmental Programs Manager

281-275-7354

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, September 08, 2008 4:33 PM
To: 'Rosson, Lacy'
Subject: RE: Baker Petrolite check (GW-135) Bloomfield Facility

Dear Lacy,

I spoke with Mark today – seems like there may have been some confusion about the applications for your discharge permits (Bloomfield and Hobbs facilities). Therefore, the New Mexico Oil Conservation Division hereby approves an extension for submittal of the additional information requested below until Thursday, September 18, 2008.

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Hansen, Edward J., EMNRD
Sent: Thursday, August 21, 2008 3:18 PM
To: 'Rosson, Lacy'
Subject: RE: Baker Petrolite check (GW-135)

Dear Lacy,

Thank you for submitting the application for renewal of your discharge permit (GW-135). I just need a few of items prior to deeming the application complete:

1) Attached is an example public notice. Please fill in the high-lighted portions as they pertain to your facility and return it to me for approval (prior to publication – I'll give you further publication details once the notice has been approved). The notice must include the depth to groundwater and the TDS concentration of the groundwater. The information submitted in the application in Appendix J may be use for your public notice.

2) In addition, please submit the name of the newspaper that you propose to publish the public notice.

3) The topographic map submitted in your application does not indicate the location of the facility. Please submit a map with the location of the facility clearly indicated (an 8.5" x 11" photocopy of that portion of the topographic map with the facility indicated would be acceptable).

4) Please append your application to include: all tanks shall be placed on impermeable pads and surrounded by lined berms or other impermeable secondary containment device having a capacity at least equal to one and one-third times the capacity of the largest tank, or, if the tanks are interconnected, of all interconnected tanks, which supersedes the "Stationary Hazardous Waste Tanks" on page 4 of 14 of the "Global HS&E Best Practices and Procedures". This is Condition #6 of your current permit.

5) Also, please append your application to include in Appendix J "Emergency Response Plan": that Baker Petrolite will contact the New Mexico Oil Conservation Division in accordance with Rule 116 (19.15.3.116 NMAC) regarding the reporting of a release to clarify Table 2-4.

Please submit the information requested above to the OCD Santa Fe Office within 10 days. If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

-----Original Message-----
From: Rosson, Lacy [mailto:Lacy.Rosson@bakerpetrolite.com]
Sent: Friday, May 30, 2008 10:41 AM
To: Hansen, Edward J., EMNRD
Subject: Baker Petrolite check

Attached is the check number that was mailed directly to the NM oil and gas division. I had requested it come to me first, but it didn't happen. It was mailed out on Tuesday of this week. Sorry for the delay.

Thanks,
Lacy Rosson, CHMM
Environmental Programs Manager
281-275-7354

-----Original Message-----
From: 104XEWC245@bakerhughes [mailto:104XEWC245@bakerhughes]
Sent: Friday, May 30, 2008 11:40 AM
To: Rosson, Lacy
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [104XEWC245@bakerhughes]
Number of Images: 1
Attachment File Type: PDF

WorkCentre Pro Location: machine location not set
Device Name: XRX0000AA6ECC89

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BAKER HUGHES

Baker Petrolite

12645 West Airport Blvd.
Sugar Land, Texas 77478
P.O. Box 5050
Sugar Land, Texas 77487-5050
Tel 281-276-5400
Fax 281-275-7385
www.bakerhughes.com

September 25, 2008

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St Frances Drive
Santa Fe, NM 87505

Re: Permit Number GW135 renewal

To Whom It May Concern:

Enclosed is the revisions to the Discharge Plan Application for the Baker Petrolite Corporation facility located at 100 Montana Street in Bloomfield, NM. The facility's emergency response and SPCC plans are currently under review.

If you have any questions or concerns, please feel free to contact me at 281-275-7354.

Sincerely,
BAKER PETROLITE CORPORATION

Lacy Rosson

Enclosure

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: Renewal Discharge Permit Number GW 135

2. Operator: Baker Petrolite Corporation

   Address: 100 Montana, Bloomfield, NM 87413

   Contact Person: Allan Mashburn Phone: 432-789-3351

3. Location: /4 NW /4 Section 3 Township 29 North Range 11 West
   Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

6. Attach a description of all materials stored or used at the facility.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

11. Attach a contingency plan for reporting and clean-up of spills or releases.

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Ann Barker Title: Interim Director HSEQ&RA

Signature: Ann R Barker Date: 2/22/08

E-mail
Address: LACY.ROSSON@BAKERPETROLITE.COM

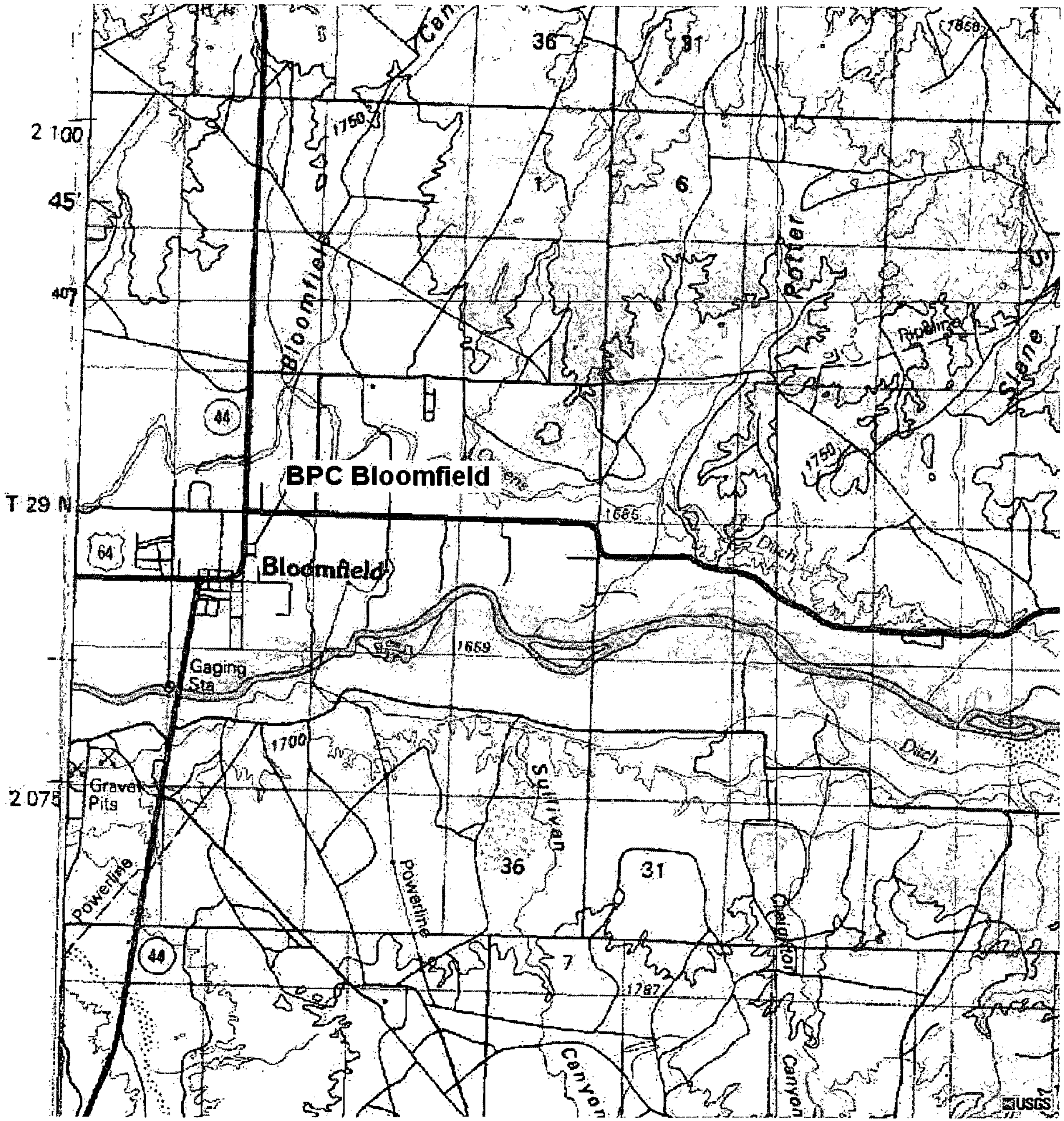
PUBLIC NOTICE

Baker Petrolite Corporation, Lacy Rosson, Environmental Program Manager, 12645 West Airport Blvd., Sugar Land, Texas 77478, has submitted a renewal application for the previously approved discharge plan (GW-135) for their BPC Bloomfield facility, 100 Montana Street, located in the NW/4 of Section 3, Township 29 North, Range 11 West, Bloomfield, San Juan County, New Mexico. Approximately 200 empty barrels are generated on site annually, which are collected and temporarily stored on impermeable surface prior to transport and disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 180 feet, with a total dissolved solids concentration of approximately 2000 to 4000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

{This public notice is proposed to be published in the *Farmington Daily Times*.}

Discharge Plan Application Information

APPENDIX A – TOPO MAP



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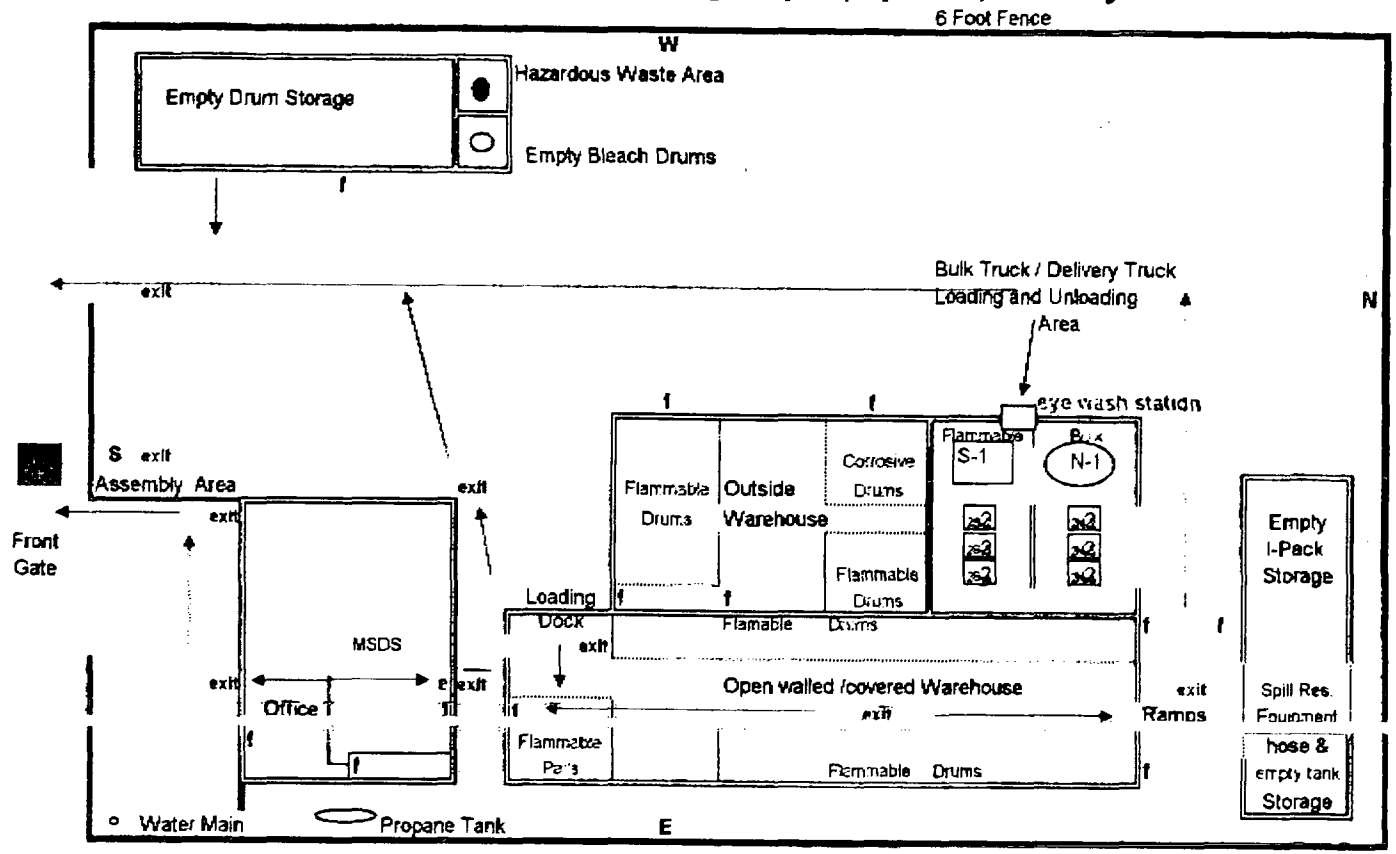
APPENDIX B – Owner

Baker Petrolite Corporation
12645 W Airport Blvd
Sugar Land, Texas 77478
281-276-5400

APPENDIX C – Facility Diagram

exit

Bloomfield, N. M. Warehouse, Emergency Equipment, Site Layout and Exits



f = Fire extinguishers
MSDS = Located in front Office

100
MONTANA

Hwy. 550

APPENDIX D – Product List

Material	SLoc	Material Description	Unrestr.-use stock	BUn	Total value (Unrestr.)	Crcy	Stock in transfer	Total value	Plnt Name 1	In quality insp.	Total value	Restricted-use	Total value	Blocked	Total value	Returns	Total value
BWAO2613-10	0001	WAO2613 WETTING AGENT	1.000	DRM	346.43	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWAO3012U-10	0001	WAO3012U WETTING AGENT	14.500	DRM	4,949.72	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWAW273-10	0001	WAW0273C WATERFLOOD/COMBIN	40.500	DRM	4,990.82	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWCW1610-10	0001	WCW1610 COMBINATION INHIBITOR	7.791	DRM	2,036.96	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWCW4488-60	0001	ENVIROSWEET WCW4488	2	TB	367.06	USD	0	0.00	1178 BPC, Bloomfield	0	0.00	0	0.00	0	0.00	0	0.00
BWCW4526-10	0001	WCW4526 COMBINATION INHIBITOR	63.303	DRM	13,381.67	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWCW5827-10	0001	WCW5827 WETTING AGENT	3.000	DRM	585.72	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWLC23-10	0001	WLC23 FOAMER	1.068	DRM	339.12	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWLC821-00	0001	WLC821 A-SOL P-38	45,822.840	LB	26,119.01	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BWLC821-10	0001	WLC821 A-SOL P-38	68.339	DRM	16,568.14	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BXC102W-00	0001	X-CIDE 102W INDUSTRIAL BACTER.	73.210	LB	63.97	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BXC102W-10	0001	X-CIDE 102W INDUSTRIAL BACTER.	99.052	DRM	42,219.99	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BXC107W-00	0001	X-CIDE 107W INDUSTRIAL BACTER.	26,449.230	LB	26,070.96	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BXC107W-10	0001	X-CIDE 107W INDUSTRIAL BACTER.	35.090	DRM	16,217.54	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00
BXC150-10	0001	X-CIDE (R) 150 IND BACTERICIDE	5.182	DRM	3,977.70	USD	0.000	0.00	1178 BPC, Bloomfield	0.000	0.00	0.000	0.00	0.000	0.00	0.000	0.00

Material SLoc SL	Material Description Unrestr.-use BUn Value Unrestr. Crcy	Stock in transfer Total Value	Plnt Name 1 In quality insp. Total Value	Restricted-use Total Value	Blocked Total Value	Returns Total Value
BAY80-10 0001	AY0080 KCI SUBSTITUTE 1.000 DRM 278.96 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCG0118-10 0001	CG0118 CORROSION INHIBITOR 10.500 DRM 4,378.19 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCG0200-10 0001	CG0200 CORROSION INHIBITOR 8.000 DRM 3,140.96 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCG049-10 0001	CG049 CORROSION INHIBITOR 25.211 DRM 7,386.07 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCG050-10 0001	CG050 CORROSION INHIBITOR 26.073 DRM 8,297.21 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCG061-10 0001	CG061 CORROSION INHIBITOR 21.545 DRM 5,263.44 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCGW437-10 0001	CGW437 CORROSION INHIBITOR 4.000 DRM 1,686.44 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCGW9107-10 0001	CGW9107 CORROSION INHIBITOR 35.927 DRM 5,999.44 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCLW3060-10 0001	SURFSWEEP (TM) CLW3060 10.456 DRM 1,900.07 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCLW3069-10 0001	CLW3069 CLEANER 1.000 DRM 89.04 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCLW9805-10 0001	CLW9805 CLEANER 1.000 DRM 94.05 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCLW9805-20 0001	CLW9805 CLEANER 4 PL1 27.32 USD	0 0.00	1178 BPC, Bloomfield 0 0.00	0 0.00	0 0.00	0 0.00
BCORRSTICKS-60 0001	CORROSION STICKS 1 TB 115.20 USD	0 0.00	1178 BPC, Bloomfield 0 0.00	0 0.00	0 0.00	0 0.00
BCR0195-10 0001	CR0195 CORROSION INHIBITOR 16.795 DRM 5,789.07 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BCR0381-10 0001	CR0381 CORROSION INHIBITOR 1.164 DRM 336.29 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00

Material Total Value	Material Description Total Value	Plnt Name 1 Total Value	Restricted Use Total Value	Blocked Total Value	Returns Total Value
BCRS935-10	CRS935 WATER TREATING PELLETS	1178 BPC, Bloomfield			
0001	2.000 DRM 0.000	0.000	0.000	0.000	0.000
	2,475.00 USD 0.00	0.00	0.00	0.00	0.00
BCRW100-10	CRW100 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	3.000 DRM 0.000	0.000	0.000	0.000	0.000
	1,141.56 USD 0.00	0.00	0.00	0.00	0.00
BCRW37-10	CRW37 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	19.000 DRM 0.000	0.000	0.000	0.000	0.000
	5,794.43 USD 0.00	0.00	0.00	0.00	0.00
BCRW9110-10	CRW9110 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	9.628 DRM 0.000	0.000	0.000	0.000	0.000
	2,402.73 USD 0.00	0.00	0.00	0.00	0.00
BCRW9133-10	CRW9133 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	63.161 DRM 0.000	0.000	0.000	0.000	0.000
	11,331.73 USD 0.00	0.00	0.00	0.00	0.00
BCRW9145-10	F.O.A.M. (TM) CRW9145 FOAMER	1178 BPC, Bloomfield			
0001	4.000 DRM 0.000	0.000	0.000	0.000	0.000
	1,180.76 USD 0.00	0.00	0.00	0.00	0.00
BCRW9150-10	CRW9150 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	19.000 DRM 0.000	0.000	0.000	0.000	0.000
	6,981.74 USD 0.00	0.00	0.00	0.00	0.00
BCRW9152-10	CRW9152 CORROSION INHIBITOR	1178 BPC, Bloomfield			
0001	4.000 DRM 0.000	0.000	0.000	0.000	0.000
	1,506.32 USD 0.00	0.00	0.00	0.00	0.00
BDFO119-10	DFO119 DEFOAMER	1178 BPC, Bloomfield			
0001	1.500 DRM 0.000	0.000	0.000	0.000	0.000
	622.40 USD 0.00	0.00	0.00	0.00	0.00
BDFO3009-10	DFO3009 DEFOAMER	1178 BPC, Bloomfield			
0001	1.000 DRM 0.000	0.000	0.000	0.000	0.000
	244.55 USD 0.00	0.00	0.00	0.00	0.00
BDFO3043U-10	DFO3043U	1178 BPC, Bloomfield			
0001	5.000 DRM 0.000	0.000	0.000	0.000	0.000
	1,802.15 USD 0.00	0.00	0.00	0.00	0.00
BDFO91-10	DFO91 DEFOAMER	1178 BPC, Bloomfield			
0001	6.000 DRM 0.000	0.000	0.000	0.000	0.000
	1,749.72 USD 0.00	0.00	0.00	0.00	0.00
BDMO146-10	DMO0146F DEMULSIFIER	1178 BPC, Bloomfield			
0001	5.634 DRM 0.000	0.000	0.000	0.000	0.000
	1,907.36 USD 0.00	0.00	0.00	0.00	0.00
BDMO295-10	DMO0295G DEMULSIFIER	1178 BPC, Bloomfield			
0001	49.510 DRM 0.000	0.000	0.000	0.000	0.000
	19,934.19 USD 0.00	0.00	0.00	0.00	0.00
BDMW2336-10	DMW2336D DEMULSIFIER	1178 BPC, Bloomfield			
0001	0.613 DRM 0.000	0.000	0.000	0.000	0.000
	186.00 USD 0.00	0.00	0.00	0.00	0.00

Material	Material Description		Stock in transfer	Plnt Name 1 / In quality insp.	Restricted-use	Blocked	Returns
SLoc SL Unrestr. use / Value of unr. stock			Total value	Total value	Total value	Total value	Total value
BFMS305-20	FMS305 WATER TREATMENT STICK			1178 BPC, Bloomfield			
0001	1	PL1	0	0	0	0	0
	216.00	USD	0.00	0.00	0.00	0.00	0.00
BFMS325-70	FMS325 FOAM STICK			1178 BPC, Bloomfield			
0001	4	AP	0	0	0	0	0
	540.00	USD	0.00	0.00	0.00	0.00	0.00
BFMS5391-20	FMS5391 FOAM STICK			1178 BPC, Bloomfield			
0001	2	PL1	0	0	0	0	0
	163.00	USD	0.00	0.00	0.00	0.00	0.00
BFMW2-10	F.O.A.M. (TM) FMW2 FOAMER			1178 BPC, Bloomfield			
0001	43.904	DRM	0.000	0.000	0.000	0.000	0.000
	17,508.04	USD	0.00	0.00	0.00	0.00	0.00
BFMW25-10	F.O.A.M. (TM) FMW25 FOAMER			1178 BPC, Bloomfield			
0001	5.000	DRM	0.000	0.000	0.000	0.000	0.000
	1,759.20	USD	0.00	0.00	0.00	0.00	0.00
BFMW3074-10	FMW3074			1178 BPC, Bloomfield			
0001	1.000	DRM	0.000	0.000	0.000	0.000	0.000
	94.72	USD	0.00	0.00	0.00	0.00	0.00
BFMW500-10	FMW500 FOAMER			1178 BPC, Bloomfield			
0001	22.291	DRM	0.000	0.000	0.000	0.000	0.000
	10,109.42	USD	0.00	0.00	0.00	0.00	0.00
BHSW4118-00	HSW4118 SULFIDE SCAVENGER			1178 BPC, Bloomfield			
0001	80,317.615	LB	0.000	0.000	0.000	0.000	0.000
	42,407.74	USD	0.00	0.00	0.00	0.00	0.00
BHSW4118-10	HSW4118 SULFIDE SCAVENGER			1178 BPC, Bloomfield			
0001	5.998	DRM	0.000	0.000	0.000	0.000	0.000
	1,687.12	USD	0.00	0.00	0.00	0.00	0.00
BHSW700-10	PETROSWEET HSW700 SCAVENGER			1178 BPC, Bloomfield			
0001	112.753	DRM	0.000	0.000	0.000	0.000	0.000
	28,845.63	USD	0.00	0.00	0.00	0.00	0.00
BMD2934-10	MD 2934 (CRO C 618B)			1178 BPC, Bloomfield			
0001	2.000	DRM	0.000	0.000	0.000	0.000	0.000
	1,546.36	USD	0.00	0.00	0.00	0.00	0.00
BOSW5200-10	OSW5200 OXYGEN SCAVENGER			1178 BPC, Bloomfield			
0001	16.018	DRM	0.000	0.000	0.000	0.000	0.000
	1,957.40	USD	0.00	0.00	0.00	0.00	0.00
BPAO100-10	PAO100 PARAFFIN SOLVENT			1178 BPC, Bloomfield			
0001	25.008	DRM	0.000	0.000	0.000	0.000	0.000
	5,636.56	USD	0.00	0.00	0.00	0.00	0.00
BPAO103-10	PAO0103F PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001	65.915	DRM	0.000	0.000	0.000	0.000	0.000
	17,141.19	USD	0.00	0.00	0.00	0.00	0.00
BPAO2000-10	PAO2000 PARAFFIN DISPERSANT			1178 BPC, Bloomfield			
0001	8.250	DRM	0.000	0.000	0.000	0.000	0.000
	2,482.10	USD	0.00	0.00	0.00	0.00	0.00

Material SLoc	Material Description Unrestricted-use stock Unit Total value	Stock in transfer Total value	Plnt Name 1 In quality insp. Total value	Restricted-use Total value	Blocked Total value	Returns Total value
BPAO31-10 0001	PAO31 PARAFFIN INHIBITOR 5.000 DRM 1,605.80 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPAO42-10 0001	PAO42 PARAFFIN INHIBITOR 11.000 DRM 3,256.33 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPAO480-10 0001	PAO480F PARAFFIN INHIBITOR 4.432 DRM 1,604.03 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPAO77-10 0001	PAO077F PARAFFIN INHIBITOR 17.227 DRM 4,933.65 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPFR23-00 0001	METHANOL 10,077.600 LB 1,813.97 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPFR549-10 0001	SODIUM HYPOCHLORITE,10% SOL. 4.000 DRM 399.76 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BPFR83-10 0001	PFR0083 XYLENE 0.018 DRM 4.23 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BRE4894HSS-20 0001	ENVIROSWEET (R) WCW4894 0.500 PL1 287.87 USD	0 0.00	1178 BPC, Bloomfield 0 0.00	0 0.00	0 0.00	0 0.00
BRE7629CRO-10 0001	RE7629CRO 83.000 DRM 39,315.44 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BSCW237-10 0001	SCW237 SCALE INHIBITOR 21.045 DRM 7,287.46 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BSCW2600-10 0001	SCW2600 SCALE INHIBITOR 2.846 DRM 826.28 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BSCW299-10 0001	SCW299 SCALE INHIBITOR 17.936 DRM 4,556.83 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BSCW4754-20 0001	SCW4754 SCALE INHIBITOR PELLET 45 PL1 15,750.00 USD	0 0.00	1178 BPC, Bloomfield 0 0.00	0 0.00	0 0.00	0 0.00
BSCW4863-10 0001	SCW4863 SCALE INHIBITOR 2.000 DRM 665.68 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00
BSRW6911-10 0001	SRW6911 SCALE REMOVER 38.000 DRM 14,983.02 USD	0.000 0.00	1178 BPC, Bloomfield 0.000 0.00	0.000 0.00	0.000 0.00	0.000 0.00

Material / SLoc	Material Description / Unrestr.-use stock / Total Value	Unit / Crcy	Stock in transfer / Total value	Plnt Name 1 / In quality insp. / Total value	Restricted-use / Total value	Blocked / Total value	Returns / Total value
BXC302-10	X-CIDE 302 INDTRL BACTERICIDE			1178 BPC, Bloomfield			
0001	35.802	DRM	0.000	0.000	0.000	0.000	0.000
	11,982.79	USD	0.00	0.00	0.00	0.00	0.00
BXC307-10	X-CIDE 307 INDTRL BACTERICIDE			1178 BPC, Bloomfield			
0001	18.424	DRM	0.000	0.000	0.000	0.000	0.000
	4,487.76	USD	0.00	0.00	0.00	0.00	0.00
BXC370-10	X-CIDE 370 INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	1.908	DRM	0.000	0.000	0.000	0.000	0.000
	745.32	USD	0.00	0.00	0.00	0.00	0.00
BXC408-10	X-CIDE 408			1178 BPC, Bloomfield			
0001	0.018	DRM	0.000	0.000	0.000	0.000	0.000
	5.94	USD	0.00	0.00	0.00	0.00	0.00
BXC535-10	X-CIDE (R) 535			1178 BPC, Bloomfield			
0001	1.809	DRM	0.000	0.000	0.000	0.000	0.000
	1,183.27	USD	0.00	0.00	0.00	0.00	0.00
BXC600-40	X-CIDE 600 INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	26.438	BOX	0	0	0	0	0
	8,074.17	USD	0.00	0.00	0.00	0.00	0.00
* Total							
	518,141.28	USD	0.00	0.00	0.00	0.00	0.00

APPENDIX E – Present Sources of Effluent and Solid Wastes

There are no sources of effluent waste water or other sanitary waste, from this facility. Inventory which is deemed unsuitable for sale is profiled and disposed of according to State and Federal regulation.

APPENDIX F – Procedure for Liquid and Solid Waste

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In accordance with this permit, all tanks shall be placed on impermeable pads and surrounded by lined berms or other impermeable secondary containment device having a capacity at least equal to one and one-third times the capacity of the larges tank, or, if the tanks are interconnected, of all interconnected tanks, which supersedes the "Stationary Hazardous Waste Tanks" on page 4 of 14 of the Global HS&E Best Practices and procedures.

SECTION TITLE: **Waste Management**	**SECTION:** 410 **PAGE:** 1 of 14
ISSUE DATE: 1 October 2006	**REVISION:** 2

PURPOSE:	This procedure provides guidance for handling, storing, and disposing of wastes. In all cases, compliance with applicable local regulatory requirements determined to be more stringent or not included in this procedure shall govern.
SCOPE:	This procedure applies to all BPC locations worldwide.
HS&E IMPACTS:	Failure to follow this procedure may result in non-compliance with both BPC procedure and applicable environmental regulations.
ADDITIONAL REFERENCES:	USEFM 9 - Waste Management USEFM 13 - Waste Minimization BHI HS7E MS Operational Control – Waste Management and Minimization
DEFINITIONS:	**Disposal** – The discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid or hazardous waste into or on land or water such that the waste may enter the environment or be emitted into the air or discharged into any body of water including ground waters. **Generator** – The entity generating the waste. **Process Knowledge** – Understanding process inputs and outputs to determine composition of a waste. **Recycling** – Using, reusing, or reclaiming materials/waste including processes that regenerate a material or recover a usable product and minimize waste generation. **Source Reduction** – Any practice that reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment prior to recycling, treatment, and disposal or reduces the hazards associated with the release of such substances, pollutants, or contaminants. **Treatment** – Any method designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste or to recover energy or material resources from the waste or to render such waste non-hazardous, or less-hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. **Waste** – Non-product outputs of processes and discarded products that have no economically viable use, must be managed responsibly and in accordance with applicable laws and regulations. **Waste Minimization** – The reduction, to the extent feasible, of waste that is subsequently treated, stored, and disposed. Waste minimization includes any source reduction or recycling activity, undertaken by a generator, resulting in the reduction of the total volume or quantity of waste, or the reduction of toxicity of waste; or both, so long as the reduction is consistent with the goal of minimizing the present and future threat to human health and the environment.
APPROVED BY:	Reggie Kennedy
POSITION:	Director, HSE/Q&RA Department

1.0 Responsibility

1.1 It is the responsibility of appropriate **Facility/Site/Area Managers (FSA)** to communicate these procedures, adhere to these requirements and provide training to all personnel under their supervision.

1.2 It is the responsibility of **BPC Personnel** to review, understand and adhere to the procedures outlined in this document for the management of wastes.

1.3 It is the responsibility of the **HSE/Q&RA Department** to develop waste management procedures and assist BPC personnel with implementation.

2.0 Waste Management Requirements

BPC facilities generate different types of wastes such as process, lab, paper and office trash, empty containers, and contaminated soil and debris. Some of these wastes may be considered hazardous depending on the respective local, regional or country regulations and may require special handling procedures. Specific countries may require registration of facilities that generate hazardous waste. In these cases, a hazardous waste generator identification number may be issued.

Local, regional and country requirements for disposal of wastes vary greatly throughout the world. For facilities implementing the BPC HS&E MS, compliance tasks to meet these requirements are included on each facility's Register of Legislation and the current List of Tasks and must be considered in the Waste Management Plan (Reference HS&E MS Level 2 Core Procedure 320). BPC procedure regarding proper disposal of hazardous wastes should be used as a baseline or minimum requirement in areas where local, regional or country regulations are nonexistent or not enforced. Contact the FSA HS&E representative if you have any questions regarding a specific local, regional or country regulation.

3.0 Hazardous Waste

BPC prefers not to operate any permitted disposal sites, and prohibits the disposal of hazardous waste on BPC property, as well as the transportation of hazardous waste using company vehicles. This section provides the minimum requirements that must be followed at all BPC facilities that generate hazardous waste.

3.1 Hazardous Waste Determination

Most local, regional or country regulations require the generator to determine if a generated waste is hazardous or non-hazardous. In many areas of the world, wastes are considered hazardous if they meet either of three criteria: (1) if they pose a fire hazard, 2) are corrosive or reactive, or (3) if they pose a danger (e.g., toxic) to human health or the environment. Hazardous waste may be determined by referring to the physical characteristics of the material on the MSDS, by conducting a laboratory analysis for flash point, pH, reactivity, and toxicity, or by applying process knowledge of the generator. If unable to classify the waste as hazardous by one of these methods, contact the HSE/Q&RA Department for assistance.

3.2 Storage Requirements

A hazardous waste storage area must be designated (e.g., posted signs on at least two sides) and be secured. This can be accomplished by fencing the waste storage area or the entire site. Access to these areas must be limited to authorized personnel only. Documented inspections shall be conducted periodically, on a monthly basis at a minimum, or in accordance with applicable laws and regulations. The inspection process must include evaluation for proper labeling, container integrity, and evidence of spills or leaks. Deficiencies shall be corrected in a timely fashion (usually within 24 hours).

3.2.1 Waste Drums or Totes must be:

- in good condition, and compatible with the waste contained therein
- closed while in storage
- labeled clearly with the words "Hazardous Waste" and the appropriate hazard classification (e.g., flammable, corrosive, etc.)
- marked with the accumulation date, type of waste and applicable waste codes
- grounded before filling flammable materials
- elevated above the storage base either by pallets or other devices for drums, where possible
- kept within secondary containment that is free of cracks and deterioration

3.2.2 Stationary Hazardous Waste Tanks must be:

- compatible with contents, and grounded, if the waste is flammable
- labeled "Hazardous Waste" with the appropriate hazard designation (e.g., flammable, corrosive, etc.)
- placed within secondary containment capable of containing 110% of the largest tank's volume

Note: The storage of hazardous waste in tanks may trigger additional regulatory requirements.

3.3 Waste Disposal Approval Process

BPC facilities that generate hazardous waste must insure the waste is being properly managed/disposed by the external treatment, storage or disposal facility (TSDF). Therefore, all TSDFs should be audited or evaluated prior to disposing of any BPC waste. Drum reconditioners/disposal firms must also be audited and approved. BPC HS&E representative may complete the audit and approval process, or an evaluation can be conducted by local Representatives. The minimum requirements for local evaluation are 1) a review of the final disposal (disposition) method of the waste, 2) regulatory compliance at the TSDF site, and 3) economic health of the TSDF company. Approved waste vendors and drum reconditioners are shown on the BPC Waste Vendor list posted on the HSE/Q&RA Intranet.

Note: Landfills and other onsite disposal is prohibited at Baker Petrolite.

After the TSDF has been evaluated and determined to be the best option, all required waste approval documentation should be completed for each waste type. Required documentation will vary throughout the world and will generally be determined by the TSDF. This documentation, often termed a waste profile or waste characterization, must include the following: 1) the process generating the waste, 2) identification of components and percentage composition, 3) physical characteristics, and 4) applicable waste codes. In many cases the TSDF will provide their own waste approval form; therefore, contact these firms well in advance of shipping hazardous waste off site. For those who do not, an example waste characterization form is provided as Appendix A. Waste approval documentation must be reviewed annually (signed and dated), and updated when necessary. Some firms may also request a sample of the waste to assist in the acceptance procedures.

The use of waste brokers is discouraged, since they often use a variety of disposal firms over which BPC may have little or no control. If a waste broker must be used because assistance is needed to properly handle and characterize waste, a written contract or agreement must be established with the broker. This agreement must stipulate that only disposal sites approved by BPC may be used (refer to the BPC Waste Vendor List for audited sites with an acceptable ranking).

3.4 Hazardous Waste Transportation

Hazardous Waste shall only be transported by authorized/registered waste transportation companies in accordance with local and regional regulatory requirements. Hazardous waste shipments shall be accompanied by required documentation, which may include a manifest, bill of lading, etc.

3.5 Empty Container Disposal

Local, regional or country regulations will define when a container is empty and can be disposed of as non-hazardous waste. In areas of the world where an empty container is not defined, BPC considers a container empty if:

- for drums or pails, no more than 1 inch (2.5 centimeters) of residue remains at the bottom
- for portable or stationary tanks, no more than 0.3 percent of the material by weight remains
- for containers that held a compressed gas, the pressure in the container should be near atmospheric

Documentation showing the proper disposal of empty containers (e.g., drums) must be maintained at the facility. This documentation may include Bills of Lading, recycling certificates, etc.

3.6 Accumulation Time

Local, regional or country rules may specify the time for which a waste may remain onsite. If a time is not specified by rule, then all waste must be removed from the site within 12 months of it being deemed unusable and therefore waste.

4.0 Non-Hazardous Waste

4.1 Waste Storage Procedures

All waste containers should remain closed and labeled as non-hazardous waste. Salvage and scrap piles should be well organized.

4.2 Non-Hazardous Chemical Wastes

Many liquid wastes (especially industrial or commercial chemicals) can damage landfills and contaminate the groundwater. Therefore, BPC prohibits liquid wastes (with the exception of food wastes) from being placed in the facility trash and later into a landfill, where other feasible disposal options exist. Appropriate handling includes:

- Liquids must be totally removed using acceptable methods such as stabilization (i.e., cement admixture or adsorbent) or drying. Once this is accomplished, the materials may be disposed of off-site in a landfill.
- Liquids may be drained into a drum, and treated, recycled or properly disposed.
- Biological wastes, such as materials contaminated with human blood and syringes, should be segregated from regular facility trash. These materials should be placed in approved containers and disposed according to local, regional or country requirements or by incineration.

4.3 Contaminated Soil and Debris

No absorbent, soil or debris that is heavily contaminated with chemicals can be placed in the facility trash unless the material is determined to be non-hazardous, per section 3.1. In order to place materials in the facility trash, the following must be true:

- Absorbent, soil or debris must be completely dry and liquid free. Stabilization may be required.
- Large quantities of contaminated absorbents, soils or debris should be placed in separate disposal bins. These bins should be completely enclosed and the interior underlain with a plastic liner. If bins are not available or feasible the contaminated material may be placed temporarily in storage piles. These piles must be completely covered and underlain by an impermeable (i.e., plastic) liner.

4.4 Non-Hazardous Wastewater

4.4.1 Wastewater may be treated in several ways including:

- On-site evaporation
- Collection and transfer to an on-site wastewater treatment plant (an authorization or permit may be required for this practice)
- On-site spray field application, where allowable and authorized
- Discharge to an off-site wastewater treatment plant via a sewer system.
- Recycle into facility processes where appropriate and in accordance with applicable local regulatory requirements
- Recycling into customer system (production well, tank battery, etc) provided the customer has been informed of, and has approved, the practice. A signed Customer Approval letter will also be kept on file at the facility for each waste recycled. A template for this letter is available as Appendix B.

4.4.2 Sanitary Wastewater

- Sanitary waste may be discharged to a septic system or local sewer system.
- No chemically contaminated fluids shall be discharged to an onsite or offsite septic system.

4.5 General Refuse

The local landfill or collection agency should be contacted to determine what materials can be accepted for disposal at the site. Paper, plastic, wood, food wastes and miscellaneous trash comprise a large portion of facility wastes on a day-to-day basis. Therefore, these wastes should be managed as follows:

- It is recommended that general refuse be placed in totally enclosed bins or containers to limit rodent infestation and control wind blown trash.
- Burning of trash is not recommended.
- Paper, aluminum, glass and cardboard should be separated for recycling whenever possible.
- Ensure aerosol cans are empty prior to placing in the trash.
- Grease and oil rags should be returned to the local cleaning service, whenever possible. Ensure that rags are dry prior to disposal in the trash.
- Paint wastes and brushes should be totally dry prior to placement in facility trash bins. Empty solvent cans/pails and lab waste containers should be completely aerated prior to disposal.

4.6 Other Wastes that Require Special Handling

4.6.1 Tires and Batteries

Should be used for their intended purpose only, and returned to the nearest recycler or service center at the end of their useful life, when possible. It is recommended that vehicle maintenance be performed off-site to ensure proper return of the used tires and batteries.

4.6.2 Scrap Metal

Should be clean and free of solvents or oil when in storage at the site.

4.6.3 Construction Debris

Should be clean and free of contamination. Whenever possible, this material should be crushed and used as road aggregate at the site.

4.6.4 Dead Vegetation

Should be removed on a regular basis and the use of pesticides, diesel, oil or other chemicals not intended for use as an herbicide is prohibited. The vegetation should be mulched at the site and used as plant bedding materials. Otherwise, this waste should be composted. Burning of vegetation is not recommended and is prohibited in areas where flammable or combustible materials are stored.

4.6.5 Asbestos Wastes

Asbestos materials must only be removed or encapsulated by experienced and qualified removal contractors when it first becomes friable.

4.6.6 Used Equipment

Electronic equipment such as computers, printers, monitors, etc. should not be placed in the trash bins. These items should be sent to a recycling/reclamation site or appropriate disposal facility.

4.6.7 Low-Level Radioactive Wastes

Low-level radioactive wastes, such as lithium batteries, should be returned to the nearest recycler whenever possible. When recycling opportunities do not exist, these materials shall be encapsulated in approved radioactive waste containers and disposed at an approved waste disposal facility. While onsite, all containers must be labeled as containing "Low-Level Radioactive Wastes." Naturally Occurring Radioactive Materials (NORM) must be handled and disposed in accordance with the appropriate local, regional or national requirements. NORM wastes shall not be handled by BPC personnel but only by qualified outside disposal contractors.

5.0 Used Oil

In some cases BPC facilities will generate used oil or used oil filters from process equipment. These facilities must comply with all local, regional or country used oil management standards.

5.1 Burning in Space Heaters

BPC sites may burn used oil in oil-fired space heaters provided that it is generated by the facility and the combustion gases from the heater are vented to the ambient air.

5.2 Used Oil Filters

Oil and oil filters shall be changed at a vehicle service center, by qualified contractor, or appropriate BPC maintenance personnel, in accordance with the provisions below. Used oil filters do not have to be treated as hazardous waste provided the oil is drained. Used oil can be removed from the filters by one of the following methods:

- Puncturing the filter anti-drain back valve or the filter dome end and hot-drain
- Hot-draining and crushing
- Dismantling and hot-draining
- Any other equivalent method that will remove used oil

5.3 Oil Discharge Prohibition

The intentional discharge of used oil into a sewer, drainage system, septic tank, surface water or groundwater, watercourse, or marine water is prohibited. Used oil must not be applied to roads or land for dust suppression, weed abatement, or other similar uses that introduce used oil into the environment.

6.0 Waste Tracking and Reporting

BPC facilities that generate 1000 kilograms or 2200 pounds of any type of waste per year are required to track and assess waste generation and disposal annually by compiling a waste summary chart. Waste tracking is recommended as a best practice for locations consisting only of offices; however, it is not required. Annual waste summaries may also be required by local regulations.

The waste summary information can be used to establish the priority for waste reduction goals. It may also be useful to document the basis for establishing priority of some waste streams for reduction. When identifying one or more "prioritized" waste streams, critical considerations should include the quantity of each waste generated, the waste handling method and associated environmental impact, feasibility of reduction, available technology, cost, and the views of interested stakeholders such as employees, the community, and regulatory agencies.

7.0 Waste Minimization & Waste Reduction Goals

Waste minimization can result in significant benefits for BPC and the environment. Therefore, BPC is committed to waste minimization whenever feasible. A waste minimization program will:

- Minimize quantities of regulated waste, thereby reducing waste management and compliance costs
- Improve product yields
- Improve production efficiency
- Reduce environmental impact from waste disposal

The preferred methods of waste minimization are source reduction and recycling. The initial step towards developing a minimization program is a review of the wastes generated and the amounts. After an inventory of waste is created, an individualized waste minimization plan should be developed. The format of the plan is the responsibility of the FSA. Each plan shall be reviewed annually and revised as needed to continually reduce waste. Refer to GPP 415 - Waste Minimization for a Waste Minimization Plan template.

Facilities shall establish annual waste reduction goals based on periodic assessment and critical consideration of the factors specified above and including regulatory requirements and BPC and BHI HS&E goals.

Waste reduction goals must include identification of one or more waste streams selected for reduction, the amount of reduction desired (e.g., percentage, etc.), measurement criteria, action plans, assigned responsibilities, target dates, and should be monitored and evaluated for success. The target dates must include a beginning date or baseline year, an end date when the goal will be achieved, and timelines for significant milestones. Action plans for waste reduction should be documented in the facility Waste Minimization Plan.

8.0 Training

Personnel handling hazardous waste must receive appropriate training (e.g., proper segregation, labeling, handling, transportation, disposal, etc.) prior to conducting any related work and annually thereafter. Awareness training is required for all operations personnel and any additional employees (e.g., administrative) with responsibility for hazardous waste within 6 months of hire and annually thereafter. Documentation of training must be kept on file at the facility.

9.0 Records

For record retention requirements, reference GPP 160 - Record Retention.

- Waste characterizations, profiles and/or analyses
- Waste Disposal records (manifests or equivalent)
- Waste Minimization Plan
- Customer Approval letters
- Evaluations of Waste Disposal (TSDFs) and Recycling firms
- Waste training documentation
- Empty Container Recycling or Disposal Documentation
- Register of Legislation
- Annual Waste Summary
- Annual Waste Reduction Goals

Appendix A - WASTE CHARACTERIZATION & ANALYSIS

(This document is only to be used as a general characterization of waste when there is no other waste characterization available).

I. WASTE MATERIAL CHARACTERIZATION & ANALYSIS:

Generator Name: _____

Address: _____

Technical Contact: _____

II. GENERAL INFORMATION:

Material Name: _____

A. Does the waste contain any radioactive materials? (i.e., NORM)_____

B. What is the physical state of the material? (liquid, sludge, etc.) and indicate the volume

_____

C. Detailed description of process gathering waste:
Bulk: ف Poly Tank: ف Drum: ف Other: ف

III. MATERIAL COMPOSITION

Chemical Component	Concentration or Range (Min % Max%)

IV. PHYSICAL CHARACTERISTICS

Physical State: ___Solid _____Semi-Solid ____Liquid
Free Liquid: ___Yes _____No
Odor: ___None _____Mild ____Strong
Flash Point: ___<73 °F _____ 73 °F –140 °F ____140 °F-200°F ____>200 °F
pH: _____<2 _____>12.5 ____Actual pH:
Specific Gravity/Density: _____

Appendix B - Customer Approval Letter for Samples

Date: include here

Customer Name and Address:
Include here

Re: Baker Petrolite Corporation
Waste Minimization Program

Dear Mr./Ms:

BPC, in accordance with sound environmental practices and the Total Quality Management System, has initiated a corporate-wide Waste Minimization Program. The purpose of this program is two-fold. First it reduces the disposal of byproducts from our service operations, therefore limiting their impact on the environment. Second, these practices enable BPC to provide affordable services to our customers without impacting the quality of our products. With these purposes in mind, BPC has identified the *(Insert Customer Name)* Operations at *(Insert Customer location)* as an acceptable candidate for the return of performance test samples from our operations.

These samples, which include production liquids from your operations, will consist primarily of field bottle test samples containing produced oil and/or water with parts per million (ppm) levels of treatment chemicals. Laboratory test samples consisting of crude oil and/or produced water may also be included. With your approval, this material will be returned to the *(note area of production system, i.e. wells, bad oil tank, sump, etc. here)* at your facility to be mixed with your normal production fluids, and ultimately refined. Please be advised that these materials have been, and will be annually evaluated to ensure that they are nonhazardous. By certifying this notification, you concur with our BPC Waste Minimization Program and agree to accept production test liquids into your operation. Thank you so much for your participation in this Waste Minimization plan, and our ISO 14001 *(remove if not applicable)* waste reduction objective.

Certified by: _____ Title: _____ Date: _____

Sincerely,

BPC Representative Name
Title

Appendix C- Customer Approval Letter – Wastewater

Date: include here

Customer Name and Address:

Include here

Re: Baker Petrolite Corporation
Waste Minimization Program

Dear Mr./Ms:

BPC, in accordance with sound environmental practices and the Total Quality Management System, has initiated a corporate-wide Waste Minimization Program. The purpose of this program is two-fold. First, it reduces the disposal of byproducts from our service operations, therefore limiting their impact on the environment. Second, these practices enable BPC to provide affordable services to our customers without impacting the quality of our products. With these purposes in mind, BPC has identified the *(Insert Customer Name)* Operations at *(Insert Customer location)* as a potential candidate for re-using recyclable from our operations.

This water will be used as a substitute for the product makeup and pretreatment solutions, and will consist primarily of freshwater with trace amounts of chemical residues from stormwater containment areas or from tank rinsates. Please be advised that these materials have been, and will be annually evaluated to ensure that they are nonhazardous. By certifying this notification, you concur with our BPC Waste Minimization Program and agree to accept production test liquids into your operation. Thank you so much for your participation in this Waste Minimization plan, and our ISO 14001 *(remove if not applicable)* waste reduction objective.

Certified by: _____ Title: _____ Date: _____

Sincerely,

BPC Representative Name
Title

APPENDIX G

No modifications are proposed to the existing collection/treatment/disposal system.

APPENDIX H – Inspection Logs

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

Housekeeping: aisles, walkways, floors, and workstations

1. Are aisles, walkways, floors, and workstations kept clean, dry and free of debris?
   (YES) NO N/A

2. Are drains and floor openings guarded by a cover?
   (YES) NO N/A

3. Are rags and other soiled materials disposed of properly?
   (YES) NO N/A

4. Are all toilets and washing facilities clean and sanitary?
   (YES) NO N/A

5. Are spilled materials cleaned up immediately?
   (YES) NO N/A

6. Are trip hazards (wires/ropes/tools, material on floor, or poor flooring condition) minimized?
   (YES) NO N/A

Housekeeping: storage pads

1. Are storage pads clean, with drums stacked in rows with access between each row?
   (YES) NO N/A

2. Are drums in good condition if in use, and cleaned and disposed of if empty?
   (YES) NO N/A

3. Are drums labeled as to contents, free from leaks, in good condition, and closed?
   (YES) NO N/A

4. Are hazardous waste storage areas segregated and identified?
   (YES) NO N/A

5. Are shelving and supports of adequate capacity, stable, and in good condition?
   (YES) NO N/A

Housekeeping: yards, parking

1. Are equipment storage yards maintained and dumpsters emptied frequently to prevent spillage?
   (YES) NO N/A
2. Are speed limits posted, parking spots indicated, and are these markings observed?
   (YES) NO N/A

Housekeeping: tools, equipment

1. Are tools and equipment (both company and employee-owned) inspected, repaired or replaced when necessary, maintained in good condition, and stored in appropriate areas?
   (YES) NO N/A
2. Are guards in place for tools and machines and are they properly adjusted?
   (YES) NO N/A
3. Is personal protective equipment available for use, maintained in a sanitary condition, and stored correctly in areas where it is required?
   (YES) NO N/A
4. Are cranes, forklifts, and other motorized equipment used appropriately, in good repair, and part of a periodic (minimum quarterly) inspection process?
   (YES) NO N/A
5. Have employees received training in the proper use of tools and personal protective equipment?
   (YES) NO N/A

Work Environment: Ergonomics

1. Are workstations arranged so that twisting, reaching, repetitive motion, bending, and lifting/pulling/pushing of material is minimized?
   (YES) NO N/A
2. Is furniture adjusted, positioned, and arranged to minimize strain on the body?
   (YES) NO N/A
3. Can the job task be performed without eyestrain or glare?
   (YES) NO N/A

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

Work Environment: lights, ventilation

1. Is lighting adequate for the tasks performed and work areas properly illuminated?
   YES (NO) N/A *Not all lights are working.*

2. Are lights shielded and clean?
   (YES) NO N/A

3. In hazardous locations, are lights, fans and fixtures appropriate for the potential hazards?
   (YES) NO N/A

4. Is ventilation adequate for the area?
   (YES) NO N/A

5. If a fan is less than 7 ft. off the ground, are rotating and moving parts adequately guarded?
   (YES) NO N/A

Work Environment: temperature, humidity

1. Where temperature extremes are present, are controls, job rotation, or personal protective equipment present and used to protect against those extremes?
   (YES) NO N/A

2. Where temperature extremes are present is an adequate amount of water supplied and available to employees?
   (YES) NO N/A

Work Practices

1. Were any violations of safety policies (lockout/tagout, wearing PPE, dress codes, food/drink consumption in designated locations, etc.) observed?
   YES (NO) N/A

2. Was horseplay, lack of personal protective wear, working unsafe observed?
   YES (NO) N/A

3. Were vehicles operated at posted safe speeds?
   (YES) NO N/A

4. When required, are trucks and rail cars properly chocked?
   (YES) NO N/A

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

5. Have documented PPE (Hazard Assessments been initiated and on file?
(YES) NO N/A

Office

1. Are trip hazards and spills addressed to minimize accidents?
(YES) NO N/A

2. Are file drawers closed, weight evenly distributed throughout the filing cabinet, and storage on top of files minimized?
YES NO N/A

3. Are electrical circuits installed to minimize overloading of outlets?
(YES) NO N/A

4. Are employees instructed in proper first aid and other emergency procedures?
YES (NO) N/A No first aid

5. Are hallways kept clear of materials to allow unhindered passage to exits?
(YES) NO N/A

6. Have emergency escape procedures and routes been developed and communicated to all employees?
(YES) NO N/A

7. Are building alarms, smoke detectors, and fire systems properly maintained and tested regularly?
(YES) NO N/A

Facilities

1. Are electrical cords in good condition, not spliced, defective, frayed and are plugs grounded?
(YES) NO N/A

2. Is any temporary wiring used to service permanently installed equipment?
YES (NO) N/A

3. Is there a clear space of at least 3 feet in front of all electrical boxes?
(YES) NO N/A

4. Are portable electrical tools and equipment grounded or double insulated?
(YES) NO N/A

5. Are bonding/grounding cables in place where required?
(YES) NO N/A

6. Are electrical enclosures such as switches, receptacles, junction boxes, etc. provided with tight fitting covers or plates?
(YES) NO N/A

7. Where required (i.e. hazardous areas, hot/cold extremes, elevated surfaces, loading capacities, confined spaces, low clearances, personal protective equipment required) are appropriate signs posted?
(YES) NO N/A

8. Are elevated working surfaces more than 30 inches above the floor or ground equipped with standard guardrails?
YES (NO) N/A

9. Are ladders regularly inspected and maintained in good condition with joints between steps and side rails tight and hardware and fittings securely attached? Are mobile ladder stands also inspected?
(YES) NO N/A

Chemical Safety

1. Has the Laboratory HS&E Program been published and distributed where laboratory operations exist?
YES NO (N/A)

2. Has an HS&E Laboratory Representative been appointed as part of the Laboratory HS&E Program?
YES NO (N/A)

3. If so, is that individual knowledgeable of responsibilities?
YES NO (N/A)

4. Are bulk storage containers of flammable liquids grounded and bonded?
(YES) NO N/A

5. Are compressed gas cylinders marked, secured and stored upright with caps (valve protectors) in place when not in use?
(YES) NO N/A

6. Have employees received Hazard Communication Training and do they know where the Material Safety Data Sheets are located?
   (YES) NO N/A

7. Is there a written Hazard Communication Program specific for the facility?
   (YES) NO N/A

8. Are laboratories clean, hoods inspected on a regular basis, and employees trained on the Chemical Hygiene Plan?
   (YES) NO N/A

9. Are NO SMOKING areas established in areas where flammable or combustible materials are used or stored?
   (YES) NO N/A

10. Are employees required to use personal protective clothing and equipment when handling chemicals (e.g., gloves, eye protection, and/or respirators)?
    (YES) NO N/A

11. Are written procedures available for the appropriate selection and use of PPE?
    (YES) NO N/A

Emergency Response, First Aid

1. Are first aid kits, spill kits, eyewashes, and safety showers readily accessible, inspected periodically (minimum monthly), and visible?
   (YES) NO N/A

2. Are evacuation routes posted (primary and secondary) and do employees know their routes/responsibilities during evacuation?
   (YES) NO N/A

3. Is there a written emergency action plan specific for this facility?
   (YES) NO N/A

4. Is the emergency action plan reviewed by employees and updated periodically?
   (YES) NO N/A

Records/paperwork

1. Are all injuries appropriately reported immediately?
   (YES) NO N/A

2. Are safety training and meetings documented?
(YES) NO N/A

3. Are records kept of inspections made to identify unsafe conditions and work practices with corrective measures identified?
YES NO N/A

Fire Protection

1. Are employees aware of the fire hazards of the material and processes to which they are exposed?
YES NO N/A

2. Is the local fire department familiar with your facility, location and specific hazards?
YES NO N/A

3. Are automatic sprinkler systems and their components inspected periodically (minimum quarterly) as required?
YES NO N/A

4. Are portable fire extinguishers provided in adequate number and type, mounted safely, periodically inspected, (minimum monthly) and annually certified?
YES NO N/A

5. Are fire extinguishers mounted in readily accessible locations?
YES NO N/A

6. Are employees instructed in the use of fire extinguishers and fire protection procedures?
YES NO N/A

APPENDIX I – Emergency Response Plan

BAKER HUGHES

Baker Petrolite

FIRE, OIL, AND HAZARDOUS SUBSTANCE

EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

LOCATION: BLOOMFIELD, NEW MEXICO

This Plan was developed to conform with the following applicable laws: Clean Water Act (CWA) (40 CFR § 112), Resource Conservation and Recovery Act (RCRA) (40 CFR § 265, Subpart D), Superfund Amendments and Reauthorization Act (SARA) (40 CFR § 300, Subpart C) and Occupational Safety and Health Act (OSHA § 1910.38). As such, it will replace previous SPCC and Emergency Response plans retained at the site.

ANNUAL REVIEW

Reviewed and Approved: Jimmy Johnson Date: 9/11/02

Reviewed and Approved: _____ Date: 8/14/03 9-9-03

Reviewed and Approved: _____ Date: 7/27/04 7-27-04

BAKER PETROLITE CORPORATION
FIRE, OIL AND HAZARDOUS SUBSTANCE
EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

TABLE OF CONTENTS

1.0 CERTIFICATION*

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR § 112, attest that this SPCC plan has been prepared in accordance with good engineering practices.

(Seal) Printed Name of Registered Professional Engineer

Date Signature of Registered Professional Engineer

Registration Number State Issued

*This certification is necessary when storing oil in excess of 660 gallons or 1,320 cumulative in a contiguous area at the site.

Johnson, James M.

From: Fisketjon, John R.
Sent: Wednesday, September 11, 2002 11:24 AM
To: Johnson, James M.
Subject: RE: Copy of the SPCC plan for editing

The ERP / ASMP covers this. Also you do not need to get an engineer to certify this plan.
John

-----Original Message-----
From: Johnson, James M.
Sent: Wednesday, September 11, 2002 11:09 AM
To: Fisketjon, John R.
Subject: FW: Copy of the SPCC plan for editing

John, I opened this SPCC document and it is the same as my ERP. Is there a different SPCC plan to be on file or does the ERP cover this?

-----Original Message-----
From: Pierre, Lizanna M
Sent: Monday, July 08, 2002 9:41 AM
To: Johnson, James
Cc: Fisketjon, John; Palacios, Nicholas
Subject: Copy of the SPCC plan for editing

James,

On 6/25/02, John Fisketjohn requested that I send you a Microsoft word copy of the Baker Petrolite Spill Control and Countermeasures Plan, so that you can edit the document to meet your facility's needs.

Enclosed is the plan that you requested. Let me know if I can be of further assistance.
<< File: Insert1.doc >>

P.S.
Nick, can you add a link to the document above (in Microsoft word) to the Environmental Field Manual, Section 4, Insert4-1. Thanks.

Liz Pierre
HSE Specialist
Baker Petrolite
281-276-5878
lizanna.pierre@bakerpetrolite.com

Johnson, James M.

From: Johnson, James M.
Sent: Tuesday, January 14, 2003 8:30 AM
To: Pierre, Lizanna M
Subject: RE: Is Bloomfield participating in the corporate tank integrity testing proposal?

warehouse.xls

Lizanna, I have attached a facility plan that shows our bulk tank locations. They have their own secondary containment. Description as follows: N-1 6000 gallon capacity CGO-49.....N-2 4000 gal. cap. DIESEL.....N-3 4000 gal. cap. XC-102W.....N-4 4000 gal. cap. XC-307.....S-1 6000 gal. cap. PFR-23.....S-2 4000 gal. cap. CRW-1500.....S-3 4000 gal. cap. CRO-195.....S-4 4000 gal. cap. XC-102W.
S-1 & N-1 Tanks are 10' in Height 12' in Diameter.
S-2, S-3, S-4, N-2, N-3 and N-4 are 10' in Height 10' in Diameter.
All tanks are double walled, white, vertical, above ground, 120 gallon max. fill rate, 32 gallon withdraw rate and have 2" open vent to atmosphere.
All tanks have a 1' from top of shell working height. Roofs are fixed.
Please let me know if you need more information. THANKS, JIMMY JOHNSON

-----Original Message-----
From: Pierre, Lizanna M
Sent: Monday, January 13, 2003 8:03 AM
To: Johnson, James M.
Subject: RE: Is Bloomfield participating in the corporate tank integrity testing proposal?

Jimmy,

As you may be aware, the Spill Prevention, Control, and Countermeasures (SPCC) regulations were revised in August 2002. Because of this, tank integrity testing will be required for certain vessels containing oils.

Please respond to the following questions no later than 1/14/03:

1. Is Bloomfield subject to the SPCC regulations revised in August, 2002?
   - If so, is Bloomfield participating in the corporate HSE/Q&RA tank integrity testing proposal (i.e. the corporate group will be sending out a consolidated RFP for tank integrity testing in hopes of getting a volume discount from the vendor for all Baker Hughes facilities that need this testing done.)?

2. In order to participate in the tank integrity testing proposal mentioned above, **I will need you to complete and return Table 2-1 of the document below no later than 1/14/03.** If this is not possible, then provide me with a total number of tanks and the size of each tank.

Thanks for your immediate attention to this matter.
<< File: SPCC Plan10_02.doc >>

-----Original Message-----
From: Pierre, Lizanna M
Sent: Friday, December 27, 2002 9:58 AM
To: Johnson, James M.
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

The EPA revised the SPCC regulations in August 2002. A synopsis of changes in the new regulations is attached .
<< File: SPCC changes summary.doc >>

One of the new changes requires onshore facilities to test each above ground container for integrity on a regular schedule or whenever material repairs are made. This requirement can be found online at <http://www.access.gpo.gov/nara/cfr/cfrhtml_00/Title_40/40cfr112_00.html> where it reads:

(6) Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

-----Original Message-----
From: Johnson, James M.
Sent: Friday, December 27, 2002 9:38 AM
To: Pierre, Lizanna M
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

My SPCC Plan was reviewed and approved September 11, 2002. This is the first I have heard about tank integrity testing. Please advise.

-----Original Message-----
From: Pierre, Lizanna M
Sent: Monday, December 23, 2002 9:53 AM
To: Pierre, Lizanna M; Bell, Doug M.; Ellis, Tanya C.; Rushing, Bill W.; Aprati, Gabe A; Sanchez, John A. (BPC); Harless, Michael L.; Hill, Gregg; Bigler, John M.; Wilson, Wayne K.; Reed, Curtis A.; Mashburn, Allan; Byford, Mark L.; Mullin, Mike L.; Johnson, Jimmy; Este, Fernando; Estep, Charles D.; Rosendale, Claud C.; Joseph, Janice E.; Matthies, Tom D.; Belcher, David W.; Lambert, Hal; Johnson, James M.; Geherty, Michael
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

REMINDER

For those of you who have not already done so and you plan on participating in the tank integrity testing that will be coordinated by the corporate EP group, please don't forget to submit Table 2-1 of the enclosed SPCC plan and return it to me or Joe Hofbauer no later than 12/31/02.

<< File: SPCC Plan1_02.doc >>

To date, I have received input from the following locations:
Bakersfield
Kilgore
Lake City
Santa Paula
Sand Springs

-----Original Message-----
From: Pierre, Lizanna M
Sent: Thursday, October 31, 2002 4:30 PM
To: Bell, Doug M.; Ellis, Tanya C.; Rushing, Bill W.; Aprati, Gabe A; Sanchez, John A. (BPC); Harless, Michael L.; Hill, Gregg; Bigler, John M.; Wilson, Wayne K.; Reed, Curtis A.; Mashburn, Allan; Byford, Mark L.; Mullin, Mike L.; Johnson, Jimmy; Este, Fernando; Estep, Charles D.; Rosendale, Claud C.; Joseph, Janice E.; Matthies, Tom D.; Belcher, David W.; Lambert, Hal; Johnson, James M.; Geherty, Michael
Subject: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

To all:

The Spill P evention, Control and Countermeasures (SPCC) rule was revised and published i the Federal Register on July 17, 2002. The rule became effective on August 17, 2002.

Enclosed i the updated template for the Baker Petrolite Corporation's (BPC) SPCC plan (also know as the Fire, Oil & Hazardous Substance Emergency Response & Contingenc y Plan) which should be completed by February 17, 2003 for those sites that are subject to this regulation.

<< File: SPCC Plan10_02.doc >>

In additio , a completed copy of Table 2-1 (page 8 of the enclosed document) and section 1. (page 2 of the document) should be submitted to me (Liz Pierre) or Joe Hofbauer a soon as possible, but no later than December 15, 2002, so that tank integrity t sting (a component of the revised rule) for BPC facilities can be arranged l y the corporate Environmental Programs group.

The revise SPCC regulation, in general, applies to:

- sites th at have a total aboveground storage capacity of more than 1,320 US gallons of oil
- sites th at have a total underground (completely buried) tank capacity of more than 42,000 US gallons and these tanks are NOT subject to Underground Storage Tank (UST) egulations (i.e. 40 CFR 280 or 40 CFR 281)

(For this ru e, there is a specific definition of oil and a few exemptions that are not listed here...so if ou have questions, or if you are unsure if this applies to you, please contact me (Liz Pie re) or Joe Hofbauer.

Attached b low is a summary of changes (filename: SPCC changes summary.doc) that are specific to Baker Petrolite facilities, or feel free to go to EPA's website at http://www. pa.gov/oilspill/spcc.htm for more details.

<< File: SPCC changes summary.doc >>

2.0 EMERGENCY RESPONSE AND CONTINGENCY PLAN

2.1 Site Description

BAKER PETROLITE CORPORATION (BPC) operates facilities for the manufacture of industrial and oil field chemicals. In addition, numerous district facilities blend chemicals to customer specifications and act as distribution points to local customers. At these facilities, petroleum products and hazardous materials may be stored in bulk quantities. This plan meets the requirements set forth in 29 CFR § 1910.38. The following BPC facility stores petroleum and/or hazardous materials in quantities which may require implementation of an emergency plan:

BLOOMFIELD FACILITY
Location

100 MONTANA
(Street or Post Office Box)

BLOOMFIELD
(City) (County)

NEW MEXICO, 87413
(State) (Zip Code)

(505) 632-1000
(Phone Number)

The driving directions to the location from the nearest metropolitan center are as follows:

From Farmington go 9 miles East on Hiway 64 to Bloomfield. Turn North (left) on Hiway 550. Go 3 miles to Montana. Facility is on the Northwest corner of Hiway 550 and Montana.

2.1.1 Material and Waste Inv ntory

Table 2-1 provides an i ventory of oils and hazardous materials stored on site in quantities which, when released, n ay pose a threat to human health or the environment. A map plan depicting their storage l cations is presented in Appendix A. Material Safety Data Sheets (MSDS) are stored on s te in the facility office on the wall between the two exit doors.

2.1.2 Maintenance and Inspe tions

Normal maintenance fo the material storage facilities will be performed by facility employees under the supervision o the District or Plant Manager. Routine maintenance will include, but not be limited to:

(1) remediation of minor spills resulting from normal site operations which pose no threat to site e ployees;

(2) replacement ar d repair of leaking fittings or valves as part of normal facility maintenance; a d

(3) discharging wa er from storage containment areas.

The Manager or Emerg ncy Coordinator (EC-refer to Section 2.4.2) will determine which activities can be perfor ed by facility operators and which need be contracted due to the potential hazards involv d.

Maintenance records (A ppendix B) which detail modifications or repairs made to hazardous material, oil, and waste nits or devices shall be held at the facility for a minimum of 3 years.

At a minimum, oil, chem ical, and waste storage facilities will be inspected routinely (in accordance to the BPC Environmental Field Manual and applicable environmental laws) for:

(1) leaks, corrosio or integrity problems,
(2) accumulated li uids in containment areas,
(3) improper label ng and storage practices, and
(4) open or deterio ated containers.

An inspection record (A ppendix C) will be maintained which details inspection dates, inspection results, and a y remedial actions taken as a result of these inspections.

TABLE 2-1

OIL AND HAZARDOUS SUBSTANCE FACILITIES

Facility Number*	Type**	Construction Materials	Material Stored	Capacity	NFPA Rating
PETROLEUM					
Bulk Tank N-2	K 1	Steel	Kerosene	4000 gal.	0-2-0
COMMERCIAL CHEMICALS					

TABLE 2-1
(CON'T)***
OIL AND HAZARDOUS SUBSTANCE FACILITIES

Facility Number*	Type**	Construction Materials	Material Stored	Capacity	NFPA Rating
N-1	TANK	STEEL	CGO-49	6000	2-3-0
N-2	TANK	STEEL	KEROSENE	4000	0-2-0
N-3	TANK	STEEL	XC-102W	4000	3-3-0
N-4	TANK	STEEL	XC-307	4000	3-3-0
S-1	TANK	STEEL	PFR-23	6000	1-3-0
S-2	TANK	STEEL	CRW-1500	4000	1-2-0
S-3	TANK	STEEL	CRO-195	4000	2-3-0
S-4	TANK	STEEL	XC-102W	4000	3-3-0
HAZARDOUS WASTES					DATE
Hazardous waste	Drum	steel	Not profiled	55	
area	Drum	plastic	Not profiled	55	
"	1 drum	plastic	PAS 2000	"	8/10/07
"	9 type	plastic 5 gal	Solid Hazardous	5 gal	7/10/07

Storage locations depicted in plot plan provided in Appendix A.

**Site Numbering System*
***Drum or Tank Storage*
****Make additional copies of this table as needed.*

Baker Petrolite

RCRA Waste Generation, Storage, Accumulation Log

Bloomfiled, NM Warehouse Year 2003 Page# 1

MONTH	DATE ADDED	AMOUNT ADDED	UNITS	LOGGED BY:	90 DAY STORAGE	DATE SENT TO TSDF
January			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
February			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
March			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
April			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
May			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
ıne			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
July			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
August			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
September	9/10/03	9	Drums, Pails, Other	BES		
	9/10/03	1	Drums, Pails, Other	-1		
			Drums, Pails, Other			
October			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
November			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
December			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			

2.1.3 Fire Prevention

The site operator shall address all major work place fire hazards (i.e., storage of flammable material, welding areas and electronic panels). Once identified, proper handling and storage procedures, potential ignition source/control procedures and type of fire protection equipment available must be specifically discussed. These are as follows:

Fire Hazard	Fire Controls and Procedures
FLAMMABLES, (drums, IPACS, pails)	SIGNS (no smoking or open flames)
STATIC CHARGE (bulk tanks load/unload valves)	SIGNS (no smoking or open flames) USE STATIC LINE when loading/unloading
FLAMMABLES, (drums, IPACS, pails, bulk tanks)	FIRE EXTINGUISHERS (A- B- C) rating 20lb
ELECTRICAL PANEL	FIRE EXTINGUISHERS (A- B- C)
ELECTRICAL RECEPTACLES (out side)	FIRE EXTINGUISHERS (A- B- C) rating 20lb

2.1.4 Housekeeping

The site will control the accumulation of combustible and flammable liquids in process areas as follows:

* see waste minimization plan

All minor spills will be remediated with a minimum of 24-hours of occurrence.

2.1.5 Maintenance of Fire Protection Equipment

The site shall maintain both internal and external inspection and service programs for fire protection devices. All extinguishers/deluge systems will be inspected monthly and serviced at least annually. All other emergency equipment will be inspected accordance with the applicable sections of the BPC Safety Manual.

2.1.6 Pollution Incident Repc ts

The site shall maintain , record of pollution incidents (Appendix D). At a minimum this record will describe:

(1) date of the inc dent;
(2) nature and ext nt of the incident;
(3) internal and ex ternal notifications made, including follow-up, written reports; and
(4) actions taken t) correct the problem.

2.1.7 Employee Training

Applicable facility pers nnel responsible for managing hazardous waste, hazardous materials and oil, are required to ttend corporate hazardous waste management (40 CFR § 265) and Hazmat training course (29 CFR § 1910.120). In addition, each facility will provide a minimum of "first resp(nder awareness level" training to employees during regularly scheduled safety meetin gs. This training, at a minimum, will include familiarizing employees with the emergency res onse procedures as outlined in this plan (29 CFR § 1910.120 (q)(1). This course shall be giv n to the employee within six-months of his/her date of hire and annually thereafter by a trained and qualified instructor. In addition, this training is necessary whenever this plan or th e employee duties change. No personnel shall handle any hazardous waste/material releases until this training is completed. At a minimum, the in-house training program will include re iewing this plan as it pertains to the following topics:

(1) hazardous was e and material management procedures;
(2) identification c f potential hazards in the work place;
(3) applicable pol ution control laws and regulations;
(4) Emergency Re sponse and Contingency Plan;
   a. initially, v hen plan is developed
   b. whenever employees responsibilities change
   c. if the plan is changed
(5) emergency res onse procedures and reporting;
(6) emergency res onse notification and communications;
(7) site evacuatio plan and routes; and
(8) proper use of ersonnel protection equipment.

Employee Emergency Response training records will be maintained at the facility for a minimum of thirty (30) years after the employee resigns from the company. A copy of this record is presented as Appendix E.

2.2 Facility Design

2.2.1 Facility Drainage

A topographic map dep icting surface water flow directions is presented as Figure 2-1. The following section discu ses drainage patterns across the site, including details on out falls of facility drainage ditche and connected water bodies. Any navigable waterways or those categorized as recreatic nal or potable within 1 mile of the site are also identified.

* see attached facility d rainage flow chart – next page Figure 2-1

Water which accumula s in containment areas, dikes or sumps will not be drained to grade if there is evidence of an o il sheen, if contaminated, or if a spill occurred in the these areas. The draining of hazardous n aterial storage areas will be done manually and only after the nature of the liquids has been a scertained (by visual or chemical examination). In any case, the employee is responsible for ensuring that no hazardous substances are released to any site drainage system.

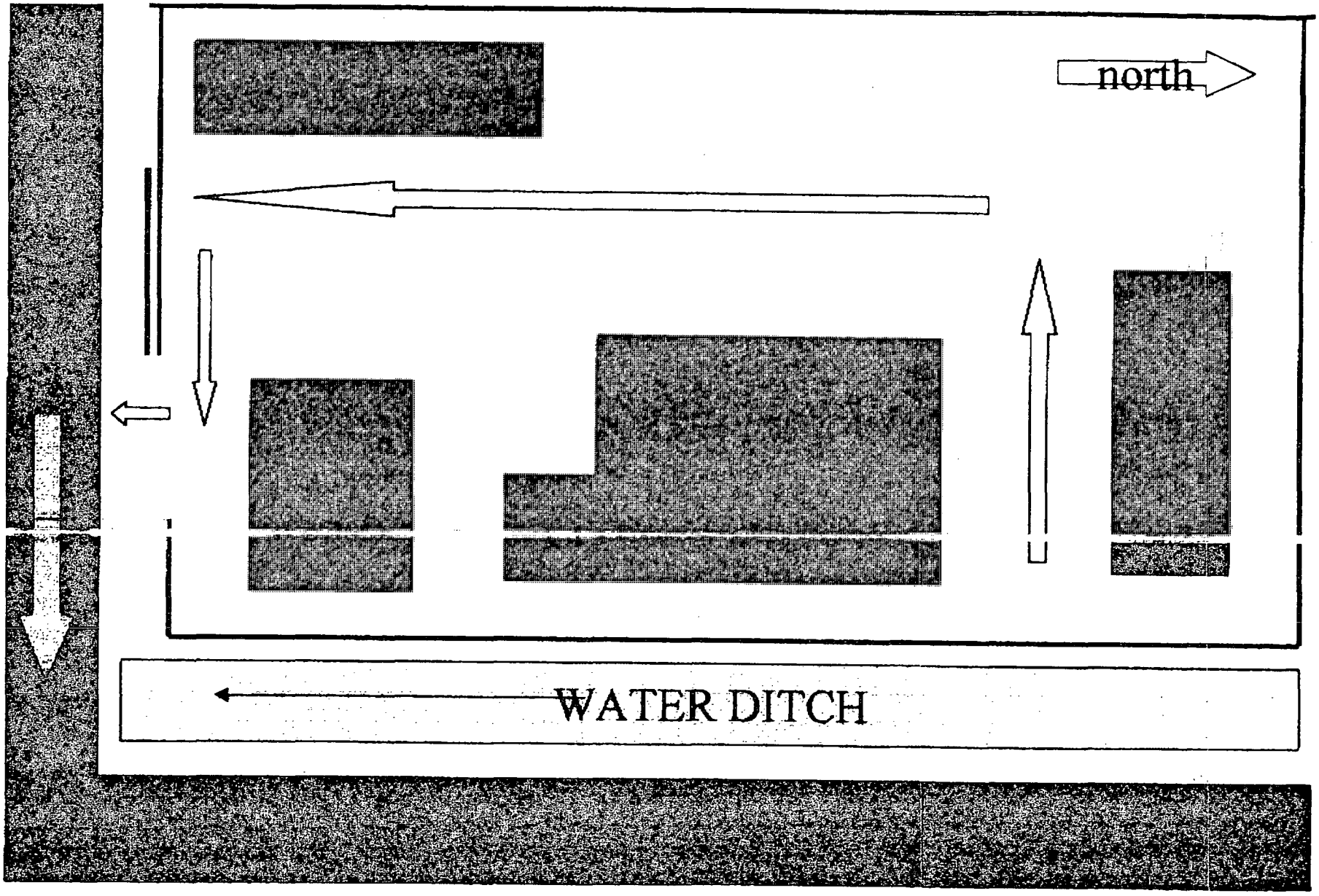
2.2.2 Spill Containment

a) Secondary Containm ent -

BPC has provided s condary containment in those areas which exhibit the potential for releases of harmful q uantities of materials. Currently, all storage tanks containing oil or hazardous substance s are bermed with concrete or earthen materials. Drum storage facilities are enclose and underlain by concrete. The drain valves from these unit containment systems remain closed.

* there are no drain v alves on any secondary containment's

Bloomfield Facility Drainage Flowchart



Should the capacity of any containment area be exceeded as the result of a catastrophic storm event or spill, these areas will be temporarily enlarged by diking with soil or sand bags until such time as remedial activities are completed. A discussion of these activities are presented in Section 2.4.4.

b) Tank Design -

All hazardous substance oil storage units are fabricated with materials compatible with their contents. No substances will be stored in any tank if not compatible with these materials. All tanks will be routinely inspected for leaks as part of normal operating procedures. In addition, each tank shall be inspected as required in accordance to standard tank manufacturing guidelines for internal corrosion or pitting. Remedial action will be taken to correct any flaws in the tank structure as soon as they become apparent.

Underground storage tanks and sumps containing oils or hazardous materials will be tested periodically to determine if a release has occurred. Any newly installed UST shall be double-lined with interstitial monitoring devices. Newly installed sumps shall be equipped with secondary containment.

c) Unloading/Loading Areas -

Tank contents unloading/loading will be restricted to paved locations or those which have secondary containment capable of holding a single hose volume. If containment is unavailable during unloading/loading operations (due to the location of the operation):

(1) nearby open drainage ditches shall be blocked off until such time as these activities are completed;

(2) temporary berms will be constructed for the unloading/loading of large quantities of hazardous liquids; and

(3) a site employee shall be present during transfer operation.

The area beneath tank trucks shall be inspected for spills before and after unloading/loading contents.

2.2.3 Site Security and Controls

Operational areas (i.e., blending and storage facilities) are enclosed by a fence or secured to prevent unauthorized entry onto the site. Unfenced areas are monitored daily to prevent vandalism to the site. Adequate lighting will be utilized to properly monitor the operational portions of the facility.

Warning signs are posted where necessary at storage facilities and operational areas. All facility gates are locked when unattended and tank valves are locked and tagged when these units are out-of-service.

2.3 Emergency Preparedness

This section provides a generic description of emergency response procedures to be performed to address hazardous material releases and fires at the site. Each response will vary depending upon the nature and extent of the incident. However, the general protocols outlined in this document will be followed.

2.3.1 Emergency Recognition and Spill Prevention

The first line of any emergency response involves prevention. As part of the routine inspections, site employees will attempt to identify potential problems before they develop into fires and/or environmental incidents. It is the employee's duty to examine each storage facility for bulging or leaking drums, tank or piping leaks, deterioration of containment dikes, stains, spills, etc. It is also the employee's responsibility to correct these problems wherever possible and communicate to the Emergency Coordinator (EC) the extent of these problems.

Should a spill or release be evident, the employee first detecting this condition will immediately adhere to the procedures outlined in this plan. If these spills occur in the employee's work area, he/she will immediately attempt to contain the spill to the smallest possible area. If the release is large or outside the work area, the facility Hazmat team will respond.

Should a fire occur, a trained employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher by an employee trained in its use or (2) the employee is a trained member of a BPC Fire Team.

2.3.2 Communication and Alarm Systems

Should the incident occur during normal working hours, the main office will act as the command post and, under the supervision of the EC, will direct the site response. Facility telephone extensions, listed in preferred order of reporting, are as follows:

NAME		TITLE
Allan Mashburn	(43:)789-3351	District Manager-EC
Jimmy Johnson	(50)632-1000	Driver ~~Warehouse Foreman~~-Alternate EC
Bryan Enns	(50:)632-1000	Area Manager-Alternate EC

Facility employees will be notified of any emergency situation and imminent hazards by the EC after the nature and extent of the problem has been determined. Notification will be completed by site alarm system, telephone, two-way radio, and/or other available means of communication.

The site evacuation and emergency communication signal is as follows (be specific):

The Bloomfield Facility utilizes a portable air horn that is in the office on the wall with the MSDS books between the two exit doors. A sign on the wall next to the air horn reads as follows: **EMERGENCY ALARM....TWO LONG BLASTS.**

Should the release occur after normal working hours, the EC coordinator or his alternate will be contacted at his residence. The name and phone numbers for the EC and alternates are provided in Section 2.4.1.

2.3.3 Physical Properties of Acrolein

Acrolein is typically a mixture of the following hazardous materials:

Acrolein	CAS 107-02-8	92 percent minimum.
Hydroquinone	CAS 123-31-9	0.35 percent Max.

The remainder of the mixture consists primarily of water. For simplicity sake, the mixture will be denoted as acrolein throughout this plan. Acrolein is a colorless to light yellow liquid with a strong odor characteristic of aldehydes. A brief overview of the physical properties of acrolein is presented below.

ACROLEIN, INHIBITED, UN 1092;

Flammable with a flash point of -13 degrees F;

Flammability limits 2.8 to 31.0 percent in air;

HIGHLY REACTIVE, If heated or contaminated with acids, alkalies, or amines, the tendency for acrolein to undergo rapid exothermic polymerization increases;

Vapor almost twice as dense as air, will collect in low areas of confined spaces;

TOXIC, Acutely toxic by inhalation and skin contact;

Vapor will cause extens ve and rapid eye tearing;

Reportable Quantity 0. 5 gallon (1 pound);

FIRE HAZARDS: Extr mely flammable. Vapors form explosive mixtures with air.

FIRE CONTROL PRO EDURES: Use foam, dry chemical, CO_2, water fog, or water spray.

Acrolein has special re uirements for transportation, handling and storage. Full containers of acrolein should be sto d in well-ventilated areas away from other chemicals, particularly alkalies or oxidizers. T e storage area should be remote and of non-combustible construction. All electrical equipme t should be Class 1, Division 2 and properly grounded. Empty containers must not be reused but returned to Baker Petrolite Corporation, Taft, California facility.

2.3.4 Physiological Effects of Acrolein

Acrolein affects the bod if it is inhaled, swallowed, or comes in contact with the eyes or skin. Acute overexposure to crolein may cause irritation of the eyes, nose, throat, lungs and skin. It may cause skin burn s. It may also cause a feeling of pressure in the chest, shortness of breath, headache, dizz ness, nausea, vomiting, pulmonary edema, and permanent lung damage. Effects may b delayed. Death may occur if high concentrations are inhaled.

Occasionally, skin aller ies such as hives or rashes may result from exposure with acrolein.

Acrolein exhibits excell nt detection qualities by virtue of its pungent odor. The following table reflects inhalation data and should not be confused with skin absorption or ingestion exposures. The table elow indicates that inhalation of acrolein will produce painful and nearly intolerable con itions quickly at vapor concentrations well below the accepted dangerous levels. Bec use of these excellent warning properties, it is highly unlikely that workers will inadverten y overexpose themselves to harmful vapor concentrations.

INHALATION DATA

Concentration	Exposure	Probable Response
.25 (ppm)	5 minutes	Moderate irritation
1.0 (ppm)	2-3 minutes	Eye/Nose irritation
1.0 (ppm)	5 minutes	Painful irritation
5.5 (ppm)	20 seconds	Painful irritation (eye & nose)
5.5 (ppm)	1 minute	Intolerable
153.0 (ppm)	10 minutes	May be fatal

Persons with asthma, allergies or other hypersensitivities may react strongly to low concentrations of acrol in that may be tolerable and innocuous to average sensitivities. Occupational exposure l mits for acrolein are presented in the following table.

OCCUPATIONAL EXPOSURE LIMITS (Parts per Million)							
Material		OSHA		ACGIH			
		EL	CEIL	TWA	STEL	Ceiling	IDLH
Acrolein		.1		0.1	0.1	0.1	2
Hydroquinone		75		.75	2		20
OSHA:	Occupa ional Health and Safety						
ACGIH:	Americ n Conference of Governmental Industrial Hygienists						
PEL	Permiss ble Exposure Limit						
CEIL.:	Maximu m instantaneous exposure ceiling						
TWA:	8-hour ime Weighted Average						
STEL:	Short T rm Exposure Limit						
IDLH:	Immedi tely Dangerous to Life and Health						

2.3.5 Acrolein Detection and Monitoring

As presented below, ac olein is readily detected by odor with a detection threshold typically below the permissible e xposure limits. Therefore, the following warning properties will be suitable acrolein detecti on: For quantitative analysis of acrolein concentrations in air, direct reading colorimetric de ector tubes may be used. Gastec acrolein tube # 93, detection range 3.3 - 800 ppm, or Drag r dimethyl sulfide 1/a tube # 6728451, detection range 0.1 - 10 ppm with determination scal located in attachment 2.

2.3.5.1 ODOR THR SHOLD

The odor th eshold will vary among humans, depending upon the olfactory sensitivity an acuteness. Detection threshold will vary between 0.05 and 0.4 ppm.

2.3.5.2 EYE IRRITA NT LEVEL

For humans, xposure of 5.5 ppm in air is intolerable in the first minute. Exposure to 1 ppm in uces tearing and will become intolerable in 4 to 5 minutes. The maximum al owable industrial exposure concentration (PEL and/or TLV) of acrolein will be sufficient to produce warning sensations and irritation. These warning prop rties can detect acrolein at or near occupational exposure limits. The 0.1 ppm exp sure limit is sufficiently low to minimize, but not entirely prevent irritation to ll exposed populations. For purposes of this plan, acrolein is considered a material with good warning properties.

2.3.6 Personnel Protection Eq ipment for Acrolein

All personnel who ma y be involved with the storage, transportation, use, disposal or emergency response of crolein must be trained in the safety and health aspects of acrolein. Personnel involved wit acrolein must have available for use, when necessary, impervious

clothing, gloves (butyl ubber or 4-H), goggles, and full-face respirators with organic vapor cartridges (refer to Res iratory Protection Guidelines Table, page 7) as necessary to prevent the possibility of cont ct. Clothing and leather shoes wet with liquid acrolein should be placed in closed contai ers for storage until proper disposal or decontamination procedures are followed. If the body is exposed to liquid acrolein, quick action must be taken to immediately wash the sk in thoroughly. A full-face respirator must be worn when a possibility of exposure to liquid a rolein is present. If the eyes are subject to possible liquid acrolein exposure, an eyewash, quick drench should be provided within the immediate work area for emergency use.

The following table wil provide respiratory protection guidelines for acrolein.

RESPIRATORY PRC TECTION GUIDELINES

CONDITI ON	MINIMUM RESPIRATORY PROTECTION
Precautionary use an For emergency escap	Full-face piece chemical respirator with organic vapor cartridges
Vapor 2.0 PPM or gre ater	Self-contained-breathing-apparatus SCBA, pressure demand type with full-face piece
Unknown concentratio ns	SCBA, pressure demand, full-face piece
Fire fighting	SCBA, pressure demand, full face piece

Only MSHA/NIOSH a proved equipment should be used. All personal protection equipment should be selected, used and maintained under the immediate supervision of trained personnel.

2.3.7 Acrolein Emergency Fi st Aid Procedures

2.3.7.1 Eye Contact

If acrolein ge s into the eyes, wash eyes immediately with large amounts of water for a minimu n of 15-20 minutes, lifting both lower and upper eye lids occasionally. Seek medica attention as soon as possible. Do not wear contact lenses when working near acrolein.

2.3.7.2 Skin Contact

If acrolein ge s on the skin, immediately flush the contaminated skin with water. If acrolein soak through clothing, remove all contaminated clothing immediately and flush the skir thoroughly with large amounts of water. Seek medical attention as soon as possi le.

2.3.7.3 Inhalation

If acrolein vapor is inhaled, move to fresh air at once. If breathing has stopped, start CPR. Keep affected person warm, dry, and at rest. Seek immediate medical attention. Administer medical oxygen.

2.3.7.3 Ingestion

If acrolein is swallowed, seek medical attention immediately. Water may be given by mouth to dilute concentration. Do not induce vomiting.

Note: All medical treatment facilities must be provided an acrolein MSDS to insure proper treatment.

Persons exposed to acrolein vapors may have a delayed reaction and experience sever irritation of the respiratory tract or other medical complications. Therefore, it is advisable to keep persons who have been exposed to high concentrations and/or persons experiencing signs and symptoms of acrolein exposure under observation for a period of 24 hours.

2.4 Personnel Responsibilities/Duties

2.4.1 Responsibilities of Employees

Actions taken by location employees during an emergency response will be limited to the those which pose no threat to their personal safety. The employee will not take any action which might be hazardous due to the nature of the release (i.e., gas, acids, etc.) without the EC's approval and appropriate personnel protection equipment (PPE).

The employee's response will vary upon the extent and nature of the incident. Small fires, minor leaks and spills (which might develop into larger environmental incidents if left un-addressed) will be remediated immediately without a formal emergency response. For larger incidents requiring outside assistance or the HazMat Team, the employee's duties will be restricted to:

(1) Limiting the magnitude of the incident (i.e., closing valves, placing adsorbent pads around spill) if possible.

(2) Contacting the EC. Remaining near the incident if not in imminent danger and providing immediate oversight until the EC arrives.

(3) Preventing the release from entering nearby surface waters, if possible.

(4) Providing security for the release area to insure that site or contract employees do not unknowingly enter this area.

(5) Sounding the alarm to nearby workers who could potentially be affected by the incident.

The responding employee should only take these actions if the release occurred in their work area.

The following critical plant activities or system shutdown will be performed by site employees prior to evacuation:

Employees working at the time of an alarm will shut off any engines / motors and close all valves applicable and proceed to muster area. The person sounding the alarm will also take the sign-in board from the wall out to the muster area with him / her.

Approved rescue and medical duties to be performed by site employees will include:

_____ _____

_____ _____

_____ _____

_____ _____

2.4.2 Emergency Coordinator and Chain-of-Command

Table 2-2 provides a list of the primary and alternate ECs for the location, including their duties, home addresses and phone numbers. They have been listed in order of preferred notification. In addition the table provides a list of the employees who may be called upon to address small and contained releases as part of a emergency response. Specific job descriptions are further outlined in Appendix F.

TABLE 2-2
LIST OF EMERGENCY RESPONSE PERSONNEL

	Name	Work Extension	Home Address	Home Phone
EMERGENCY	Allan Mashbu n	(435)789-3351	Vernal, UT	(435)789-4880
	Jimmy Johnso	(505)632-1000	Navajo Dam, N.M.	(505)632-8979
	Bryan Enns	(505)632-1000	Bayfield, CO.	(620)786-5732
ALTERNATE	Craig Smith	(505)632-1000	Farmington, N.M.	(505)324-0955
	Sean Higgins	(505)632-1000	Aztec, N.M.	(505)334-9185
EMPLOYEE RESPONSE TEAM				
HazMat Team	Jimmy Johnso	(505)632-1000	Navajo Dam, N.M.	(505)632-8979
	Donny Swearin gen	(505)632-1000	Aztec, N.M.	(505)334-8976
Rescue Team	San Juan Regio al	(505)325-5011	Farmington, N.M.	
Fire Brigade	Bloomfield Fire D ept	911 / (505)334-6622		
Security	Bloomfield Police D pt	911 / (505)334-6622		
Count Team				

2.4.3 Duties of Emergency Coordinator

The duties of the EC or his alternate are:

(1) Determine the source, character, amount, and extent of the release or incident.

(2) Assess the potential hazards to the site, environment, and neighboring community due to the incident, including possible toxic gases, hazardous runoff, etc.

(3) Sound the site alarm and/or evacuation command to alert employees, when required.

(4) Report release to the Regulatory Affairs (RA) Group in Houston in accordance with Section 2.5.

(5) Contact outside remediation services or local emergency response teams to assist with incident or injuries too serious to be addressed by site personnel.

(6) Contact Local Emergency Planning Committees (LEPC) and neighboring industries, if necessary, for assistance or to report off site releases.

(7) Commit manpower and equipment for minor incidents which can be reasonably corrected by the site personnel.

(8) Direct remediation efforts to contain and control the release in accordance to this plan.

(9) Document the remedial effort, including taking photographs if possible.

(10) Coordinate cleaning and disposal activities, including recovering usable products from the release.

(11) Ensure that all emergency equipment used during the incident is clean and fit for use prior to placing these devices back into service. Replace spent equipment where necessary.

(12) Generate follow-up incident report.

(13) As instructed, send after consulting RA, answer inquiries by the local media regarding the incident. Further information regarding media relations can be found in the Environmental Field Manual.

2.4.4 Emergency and Personal Protection Equipment

Table 2-3 provides a list of both Emergency Response and Personal Protection Equipment located on site which can be used in the event of a major spill or fire. This table also identifies storage locations of this equipment as shown in the site plot plan (Appendix A).

TABLE 2-3
LIS T OF EMERGENCY RESPONSE
AND PEI SONAL PROTECTION EQUIPMENT

EMERGENCY RESPONSE	QU ANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Fire Extinguishers	7	A – B – C rating	warehouse	20 lb. each
Hay Bales				
Oils Booms				
Chemical Absorbant (Pads/Socks/Pillows)	12	Pads, Socks & Particulate	Warehouse & Outside Response Area	100 Gallon Response
Shovels/Brooms	5	Shovels / brooms	warehouse	(3) brooms / (2) shovels
Open-Top 55-Gallon Drums	1	Steel/Seal Top	Empty IPAC Area	55 gal.
Salvage Drums	1	Overpack	Outside Response Area	65 gal.
Sump Pump				
HazMat Kit	9	Combination	Warehouse, LAB &trucks	Small response
Other (List)	100 lb.	Oil dry	warehouse	Small response
Heavy Equipment (List)				

TABLE 2-3 (CON'T)
LIS T OF EMERGENCY RESPONSE
AND PEI SONAL PROTECTION EQUIPMENT

PERSONNEL PROTECTION	QU ANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Chemical Resistant Coveralls	9	Tyvek	C/T & Delivery Trucks	Small response
Respirators:				
(Air Purifying)	4	Full face	Office file rm.	Organic
(SCBA)	3	30 minute	Lab / driver room	30 minute
(Cartridge)	1 ozen sets	Thread type	File room	Organic vapors
(Emergency Escape)	4	Bag type	Driver room	5 minute
Chemical Resistant Gloves	1 6 dozen	PVC 14"	File room	All chemicals excluding Acrolein
Boots, Acid Resistant				
Combustible Gas Indicators				
Goggles	16	chemical	All vehicles	Eye protection
/Face Shield	9	Full face	C/T & delivery trucks	Full face protection
Other (List)				

2.4.5 Equipment Cleaning/St: rage

Upon completing remod al response activities, the HazMat Team or hired contractor will be responsible for cleaning equipment and securing contaminated soils and/or water.

(1) Disposable cor taminated equipment, gloves, coveralls and respirator cartridges shall be placed in 55 gallon drums or 30-gallon fiberpacks until such time as their disposal can be schedul d;

(2) Shovels, broon s, hoses, pumps, and other portable equipment shall be thoroughly rinsed using ap propriate cleaning solutions in an area capable of containing all rinsates; and

(3) Larger excaval on and construction vehicles such as backhoes, trucks, or graders shall also be cl aned and decontaminated using appropriate cleansers and water. Care shall be t: ken to collect all rinse waters for further evaluation.

After cleaning, all equip nent shall be inspected by the EC to insure that it is in proper working condition.

Contaminated materials shall be stored in the following manner:

(1) Cleaning fluids or rinsates shall be collected and drummed at the site. These fluids shall be tested o determine if contaminated.

(2) Drums contain ng hazardous waste (including contaminated personal protection equipment and rinsate) shall be appropriately labeled and placed in the Waste Storage Area.

(3) Oil-contamina: d soils will be drummed and labeled as non-hazardous materials. Large amounts of oily soils may be stored upon and covered with plastic until such time as a roll-o f bin can be obtained for storage purposes.

(4) Soils contamin ted with hazardous substances will be properly tested and disposed as hazardous w aste, where necessary.

All materials sent off sit : for disposal shall be properly manifested in accordance with applicable regulatory re quirements. These procedures are further detailed in the Waste Management sections of the Environmental Field Manual.

2.5 Release Notification Procedures

2.5.1 Internal Notifications

Oil spills and hazardous substance releases must be immediately reported to the RA Group in Sugarland. Should RA be unavailable, releases will be reported to one of the following numbers: 281-276-5401. Information needed in this report includes:

(1) Name and address (including county and township) of the facility;

(2) Time of incident;

(3) Nature of incident, including type of substance released, estimated quantity released, and source/cause of release. Have the Material Safety Data Sheets available;

(4) Proposed actions to contain, clean up, and remove the substance and/or actions underway.

(5) Extent of any injuries and identification of any environmental/public/personnel hazards;

(6) Personnel presently on the scene, and the name and phone number of the individual coordinating the on-site response; and

(7) Names of any agencies, BPC employees, or others (i.e., media groups) notified of the incident.

An "Incident Report" will also be completed and forwarded to these parties as soon as technically feasible by the EC.

Table 2- 4 provides a list of common materials stored at BPC sites and their related Reportable Quantities (RQ). Additional RQs are presented in Appendix G. The RA Group will determine if the release constitutes a:

(1) Reportable Quantity under CERCLA;
(2) Reportable Release under the Clean Water Act or RCRA; or
(3) Reportable Threshold Quantity under SARA Title III.

This information will be helpful in making that determination.

The EC is responsible for determining the type and quantity of material released prior to reporting the incident. This information will be used by RA to determine if Agency reporting is necessary. RA will be responsible for immediately contacting the appropriate Federal and State Authorities, if necessary.

TABLE 2-4
REPORTABLE QUANTITY

MATERIAL	EPA WASTE CODE	REPORTABLE QUANTITY
Oil	----	42 gals or sheen on water
Varsol	D001	100 lbs
Methyl Ethyl Ketone	F005, U159	5000 lbs
Xylene (Xylol)	F003, U239	1000 lbs
Toulene (Toluol)	F005, U220	1000 lbs
1,1,-Trichloroethane	F001, U159	1000 lbs
HAN	D001	100 lbs
HAS	D001	100 lbs
Acrolein	P003	1 lb
Acetone	U002	5000 lbs
Methanol	F003, U154	5000 lbs
Sulfuric Acid	D002	1000 lbs
Isopropanol	D001	100 lbs
Fina Aromatic Solvent	---	42 gals or sheen on water

**Additional RQs are provided in Appendix G. Individual State requirements may be more stringent. Consultation with the applicable State Agency may be necessary.*

2.5.2 External Notifications

All off site releases of hazardous materials shall be reported verbally to the Local Emergency Planning committee by the EC. In making a determination whether an off site release has occurred, the EC will consider all resulting air emissions. Names, addresses and phone number of the appropriate parties are provided below:

Name	Organization	Number
Gary Johnson	Transportation and Industrial Services	303-833-1111
Don Cooper	LEPC	505-334-1180
CHEMTREC	EMERGENCY	800-424-9300
CANUTEC	EMERGENCY	613-996-6666

*supplemental attachment on next page

The RA Group is responsible for providing follow-up written notification to the LEPC. In addition, the RA Group shall be responsible for making written notification of releases involving reportable quantities (RQ) of hazardous substances or oils to the appropriate State and Federal Regulatory Agencies. For the State of New Mexico, this includes the Oil Conservation Division (505-476-3440) in accordance with Rule 116. For spills in excess of the hazardous substances RQ, the RA Group shall submit a written report to the EPA Administrator and/or the Oil Conservation division containing the following:

(a) Name, address, and number of the facility owner;
(b) Name, address, and number of the facility
(c) Date, time, and type of incident
(d) Name and quantity of substance released
(e) Extent of any injuries
(f) An assessment of the potential or realized hazards to human health or the environment; and
(g) An estimation of the quantity and disposition of recovered materials resulting from the incident.

For oil spills in excess of the State or Federal guidelines, within the required deadline, the RA Group shall submit a written report to the responsible Agency detailing:

(a) Name of facility owner
(b) Name and location of facility
(c) Date and year of initial facility operations
(d) Description of facility including maps, topos, and flow diagrams
(e) A copy of this plan

BAKER PETROLITE

Bloomfield Facility, N.M.

100 Montana

EMERGENCY TELEPHONE NUMBERS

In the event of an emergency please contact one the following numbers:

Bloomfield Fire Department	**911 Emergency**
And Police Department	**505-334-6622**
LEPC Don Cooper	**505-334-1180**
National Response Center	**800-424-8802**
(Immediate Notification Required)	
NM Oil Conservation Division	**505-334-6178 ext. 15**
(Immediate Notification Required)	
CHEMTREC	**800-424-9300**
Regional Safety Coordinator	**701-572-7764 off.**
John Fisketjon	**701-570-0823 cell**
	701-572-4363 hm.
District Manager	**435-789-3351 off.**
Allan Mashburn	**435-828-3351 cell**
	435-789-4880 hm.
Area Manager	**505-632-1000 office**
Bryan Enns	**505-330-3221 cell**
	970-563-4253
Canutec	**613-996-6666**
[redacted]	**505-632-1000 office**
Jimmy Johnson	**505-330-5685 cell.**
	505-632-8979 home
Regional Manager	**303-573-2272 off.**
Steve Ralston	**303-885-3867 cell**
	303-688-5151 hm.
(TIS) Local Emergency Response	**303-833-1111 off.**
Gary or Chris Johnson	**303-901-4909 cell**
Denver, CO. 888-745-9197 pgr.	**303-833-1119 fax**
Hospital-San Juan Regional	**505-599-6100**

(f) Cause of the spill;
(g) Corrective actions taken including any repairs; and
(h) Preventive measures taken to minimize the potential for similar releases.

2.6 Evacuation Plan

The EC shall inform site employees if evacuation of the facility is warranted. An evacuation plan has been developed and is attached as Appendix H. Evacuation of the facility shall be performed in the following manner:

(1) Facility employees and contractors shall walk quickly and orderly to the MUSTER AREA where a head count shall be taken;

(2) Employees should remember to remain up- or cross-wind of the release area at all times, if possible.

(3) Upon completing a head count, the EC will attempt to determine the status of missing shift workers. Should rescue operations appear necessary, the EC shall inform local emergency response teams.

(4) All non-essential personnel will then move outside the facility and will not be given access to the site until the EC has given the "all clear".

(5) The EC shall recommend the evacuation of local residences and industries to the appropriate officials, where necessary.

A map plan depicting the acceptable routes from the operating portions of the site is presented in Figure 2-2. This map depicts emergency rally points and will be prominently posted at each access point at the facility. The following individual, Jimmy Johnson, will be responsible for performing the necessary employee and visitor head count during evacuation. Visitors must log-in at each BPC facility when entering the premises and must also be informed of evacuation procedures in case of an emergency.

Figure 2-2

2.7 Arrangements with Emergency Response Contractors

The facility has made agreements with the following firms to assist the company with any required remedial actions for releases:

Firm	Phone Number
Transportation & Industrial Services, Inc. Gary Johnson / Chris Johnson	303-833-1111
Local Emergency Planning Commission Don Cooper	505-334-1180

2.8 Agreements With Local Emergency Response Teams/
Coordination With Neighboring Industries

The facility may also call on the following local emergency response teams should their assistance be required:

Police: 911 / 505-334-6622 Bloomfield
Fire Department: 911 505-334-6622 Bloomfield

Hospital: 505-325-5011 San Juan Regional Medical Center

Emergency Medical Services: 505-325-5011 San Juan Regional Medical Center

Records of response agreements made with the above teams are retained at the site and available for review.

The following industries are lo ated within 1 mile of the facility:

Industry	Address	Number
Basin Disposal	#6 CR 5046 Bloomfield	505-632-8936
B & H Construction	290 N. 1st St Bloomfield	505-634-0460
Dial Oil	330 N. 1st St Bloomfield	505-634-4777
Foutz & Bursum Construction	3201 N. 1st St Bloomfield	505-634-4000

Under the following conditions he EC shall inform these industries of an environmental incident:

(1) a hazardous substan e release occurs into a nearby water course;
(2) a release or fire occ rs, which due to its extent, may interfere with neighboring industry operations; and
(3) a release occurs, wh ch due to the toxicity or hazard involved, may endanger neighboring industry employe s.

2.9 Clean-Up Procedures

Techniques used to clean-up an contain spills shall conform with the Environmental Programs Manual and training received. he equipment present on site to address these type of releases are listed in Table 2-3. The primar purposes of any action taken when responding to a spill are:

(1) Restrict the spill to t e smallest possible area. Block off or close all area drains;
(2) Avoid contaminatin facility drains and ditches; and
(3) Use sandbags, adsor ents and fill dirt to construct temporary containment structures where necessary.

2.9.1 Petroleum Spills

(1) Restrict spill t containment area if possible by stopping or diverting flow to the tank.

(2) Small spills an leaks should be remediated as soon as feasible. Use adsorbent pads wherever possi le to reduce the amount of contaminated articles.

(3) If the release e ceeds the containment system capacity, immediately construct additional cont inment using sandbags or fill material. Never allow the oil to seep into soils or dr ins.

(4) After all recov rable oil has been collected and drummed, place contaminated soils and articles in ontainers.

(5) If a release oc urs into a facility drain or nearby stream, immediately pump any floating layer nto drums. For high velocity streams, place oil booms or hay bales between the rc ease area and the plant boundary. As soon as possible, excavate contaminated oils and sediments.

(6) For larger qua tity of soils, construct temporary waste piles using plastic liners and wood settings.

(7) Dispose of oil soils and contaminated articles in accordance with applicable State regulations.

(8) Decontaminat all equipment before storing.

(9) Document and report activities to RA Sugarland, as soon as feasible.

2.9.2 Hazardous Substance I eleases

(1) Identify the mi terial and quantity released.

(2) Block off drai s and containment areas to limit the extent of the spill. Water should never be used o disperse a spill unless absolutely necessary.

(3) Ensure that Pe sonnel Protection Equipment and containers are compatible with the material releas d.

(4) Collect and re laim, if possible, as much of the spill using a hand pump or similar device. Conta nerize contaminated soils. Never place incompatible materials in the same drum.

(5) Take a sample of the substance for analysis and waste profiling. Contact the Sugarland Off e for scheduling analytical work.

(6) Place a hazard us waste label with appropriate waste code on the drums containing contaminated r aterials. Move drums to the Hazardous Waste Storage Area.

(7) Decontaminat all equipment in a contained area. Collect and containerize decontaminati a fluids.

(8) Document and report activities to RA Sugarland.

In addition to these acti ities, surface water outfalls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations which appear affected by the release s all be impeded:

(1) with sand bag , adsorbent pads, or hay bales as necessary to prohibit the migration of contaminan s off site or

(2) with temporar earthen berms to impede large quantities of affected water.

2.9.3 Fires/Explosions

Should a fire occur, the employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher of which the employee has been trained or (2) the responder has completed the BPC Fire Training Course.

2.9.4 Immediate Release Res onse Procedures for Acrolein

Immediate response act ons for an acrolein release are:

1) Persons not wear ng personnel protective equipment must evacuate from the release area.

2) Evacuate personn l to an upwind area and determine medical treatment needs.

3) Don appropriate p rsonal protective equipment including SCBA. (Refer to MSDS)

4) Remove all ignitic n sources.

5) Ventilate release a ea.

6) Make all necessar notifications per section 10 of this document and activate emergency action plan.

7) For small quantity release (less than 1 pound):

Absorb with pape towel, dry sand, or absorbent; remove any contaminated gravel or soils; containerize and seal in secure drum; ventilate release area.

8) For large quantity release:

Vapor Suppressio

Blanket spill area with alcohol foam at 6% to reduce vapor concentration. Reapply as needed due to the ossible rapid breakdown of the foam blanket.

Note: Run off mu t not enter waterways and should be contained. Acrolein is toxic to fish at low concen ration.

Neutralization Methods

a) Cover release with sodium carbonate (Soda Ash) and mix into spill with water. The soda ash and acrolein should form a solid byproduct after addition of water.

Ratio of 20 pounds soda ash to 1 gallon of acrolein
Followed by 2 gallons of water to each gallon of acrolein

Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

b) Alternatively, a 10% solution of sodium bisulfite may be added resulting in the deactivation of the acrolein. Once stabilized, collect and store in lined overpack drums along with any contaminated gravel or soils.

CAUTION: Apply sodium bisulfite only in its liquid form. Acrolein will undergo a *rapid exothermic chemical reaction* when it comes in contact with sodium bisulfite.

2.9.5 Immediate Fire Response Procedures for Acrolein

Immediate response actions for an acrolein fire are:

1) Evacuate personnel to an upwind area and determine medical treatment needs.

2) Don appropriate personal protective equipment including SCBA.(Refer to MSDS)

3) Cool exposed container sides with water from a safe distance.

4) Let acrolein spills burn if it does not endanger personnel or property. Keep exposed acrolein containers cool.

5) Only extinguish burning acrolein if flow (release) can be stopped or safely contained. Keep exposed acrolein containers cool. Apply alcohol foam at 6% to blanket spill area to extinguish fire.

   Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

6) Water may be used to dilute acrolein pools to non-flammable concentrations.

   Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

7) Make all necessary notifications per section 2.5 of this document.

2.9.6 Containment Action for Acrolein

The following activities are presented for the handling of an acrolein release. A release will present two immediate hazards:

1) Toxicity
2) Flammability

The toxicity hazards of acrolein were previously addressed. Flammability hazards of acrolein result from the low flash point, wide flammability range, and relatively high vapor pressure at 68 degrees F.

In the event of spills, liquid acrolein should be contained within a diked area. This diked area should be pumped or drained into drums for transportation for neutralization and disposal. Residual acrolein will be neutralized with a sodium carbonate and water or sodium bisulfite solution.

The following are minimum steps mandatory when dealing with a major acrolein spill:

- Use full body chemical protective suit and boots
- Use 4-H or butyl rubber gloves
- Use full facepiece SCBA in pressure demand mode
- Evacuate the area and approach site from upwind side
- Keep acrolein containers cool
- Blanket spill area with 6% alcohol foam to reduce vapors
- Neutralize liquid acrolein with sodium carbonate and water or sodium bisulfite solution.

2.9.7 Recovery Actions for Acrolein

The premise for dealing with all releases of acrolein will be early containment and neutralization with sodium carbonate and water or sodium bisulfite solution. In this manner, recovery will proceed immediately following neutralization.

Recovery methods will depend upon the quantity of the release. The dike around the containers should be of sufficient volume to contain the contents and neutralization will occur directly in the diked area. For small releases, acrolein may be recovered with hand towels or absorbents. All contaminated materials will be neutralized with sodium carbonate and water or sodium bisulfite solution, and disposed of in accordance with all federal state and local requirements.

Major releases will require more sophisticated recovery techniques done by only qualified persons. The acrolein will be drained or pumped into drums for neutralization, transportation and disposal. Residual acrolein will be neutralized in the diked area with sodium carbonate and water or sodium bisulfite solution. Vapors will be vented to the atmosphere. No attempts will be made to recover vapors. All recovery operations will be conducted by trained, qualified personnel familiar with acrolein.

2.9.7.1 Water

In the event of an acrolein spill into water, there are few to no containment alternatives. Acrolein is water soluble, and toxic to both aquatic flora and fauna. Toxicity decreases with aqueous dilution. Acrolein degrades rapidly in water. At a minimum, a risk assessment should be conducted immediately following the spill to determine the extent of the environmental impacts.

2.9.8 Disposal Techniques for Acrolein

Spills of acrolein will require special disposal methods in accordance with local regulatory requirements. Acrolein waste will require manifesting and transport to a permitted hazardous waste disposal facility for final disposal.

Waste Acrolein, Inhibited
Waste Code - P001

Released acrolein will be secured in lined overpacked drums, sealed, and manifested in accordance with all local regulations. These drums will be placed in a designated area to await shipment to a permitted hazardous waste disposal facility. Field manifesting will be required to move the material from the facility to the designated storage area as shown in the manifest form. The waste must be disposed of within the designated regulatory time frame.

Neutralized acrolein will require proper collection and disposal. Although an "inert solid" is formed with sodium carbonate, the entire release area will require cleanup and removal of contaminated materials. The contaminated materials will be placed in lined overpacked drums, manifested, and transported to a permitted hazardous waste disposal site for incineration.

All absorbent equipment, disposable PPE, neutralized acrolein and any contaminated material will be packaged in lined overpacked steel drums and labeled with the appropriate DOT shipping notifications.

2.9.9 Acrolein Shipping Guidelines

1. Shipping Description

   Acrolein, inhibited, 6.1 (3), UN1092, PGI

2. Required Package Marks

   INHALATION HAZARD

3. Required Package Labels

   TOXIC INHALATION HAZARD (primary hazard)
   FLAMMABLE (subsidiary)

4. Required Placard

   TOXIC INHALATION HAZARD

5. Approved Packaging

   Non-Bulk

   Specification cylinders except 8, 8AL, and 39
   1A1, 1B1, 1H1, 1N1, or 6HA1 drums further packed in 1A2 or 1H2 drums

   Bulk

   Rail

   Class DOT 105,109,112,114, or 120 fusion-welded tank car tanks
   Class 106 or 110 multi-unit tank car tanks

   Cargo Tank

   Specification MC 312, MC 330, MC 331, MC 412 Cargo Tank Motor Vehicles

   Portable Tank

   DOT Specification 51 portable tank (no bottom outlet)

3.0 PLAN AVAILABILITY

One copy of this plan shall be r tained at the facility and presented for review to each regulatory agency upon request. In additio , one completed copy shall be maintained by the BPC RA Group in Sugarland. This plan shall also be submitted to any LEPC upon request.

Finally, if it is determined that a sistance may be required in the event of an emergency at the site from local police departments, h spitals, and state and local emergency response teams, a copy of the plan will be submitted to that or ganization by the facility after conferring with the RA in Sugarland. In addition, BPC invites these t ams to visit the facility to familiarize themselves with the site emergency response procedures and equipment.

4.0 PLAN IMPLEMENTATION

This plan shall be implemented pon any release of hazardous waste, hazardous substance, or petroleum products in quantities exceeding those listed in Table 2-4 and Appendix G. Depending upon the type and quantity of m terial released, the extent of remedial response will vary.

5.0 PLAN AMENDMENTS AND REVIEW

Amendments to the plan may be initiated by either BPC or the EPA Regional Administrator (or authorized State Agency). This plan shall be reviewed and revised on an annual basis, or as needed, by the Site Manager or designated representative. Changes may be made to the plan by removing inaccuracies and writing in the revised and corrected information. Every three years, this document shall be submitted to the Sugarland RA Group for corrections and re-issuance. In addition the plan will be revised:

(1) Whenever a change has occurred in facility design due to construction, operations or maintenance that materially affects the potential for an oil spill or increases the potential for fire, explosion or release of hazardous substances, or modifies the response necessary during an emergency.

(2) When required by the EPA after review or when applicable regulations change.

(3) The list of emergency coordinators or emergency equipment changes.

(4) The Plan fails during an emergency.

BPC will submit the Plan to the EPA Regional Administrator whenever one of the following occurs:

(1) Discharges of more than 1,000 gallons of oil into navigable waters in a single spill event;

(2) Discharge of oil in harmful quantities as defined by 40 CFR § 110 into navigable waters during two reportable spill events in a twelve-month period. A harmful quantity is defined as: (1) an oil spill which causes a film or sheen upon or discoloration of the surface of the water or adjoining shore lines or causes a sludge or emulsion to be

deposited beneath the surface of the water or upon adjoining shore lines, or (2) violates applicable water quality standards; or

(3) When requested to do so by the US EPA.

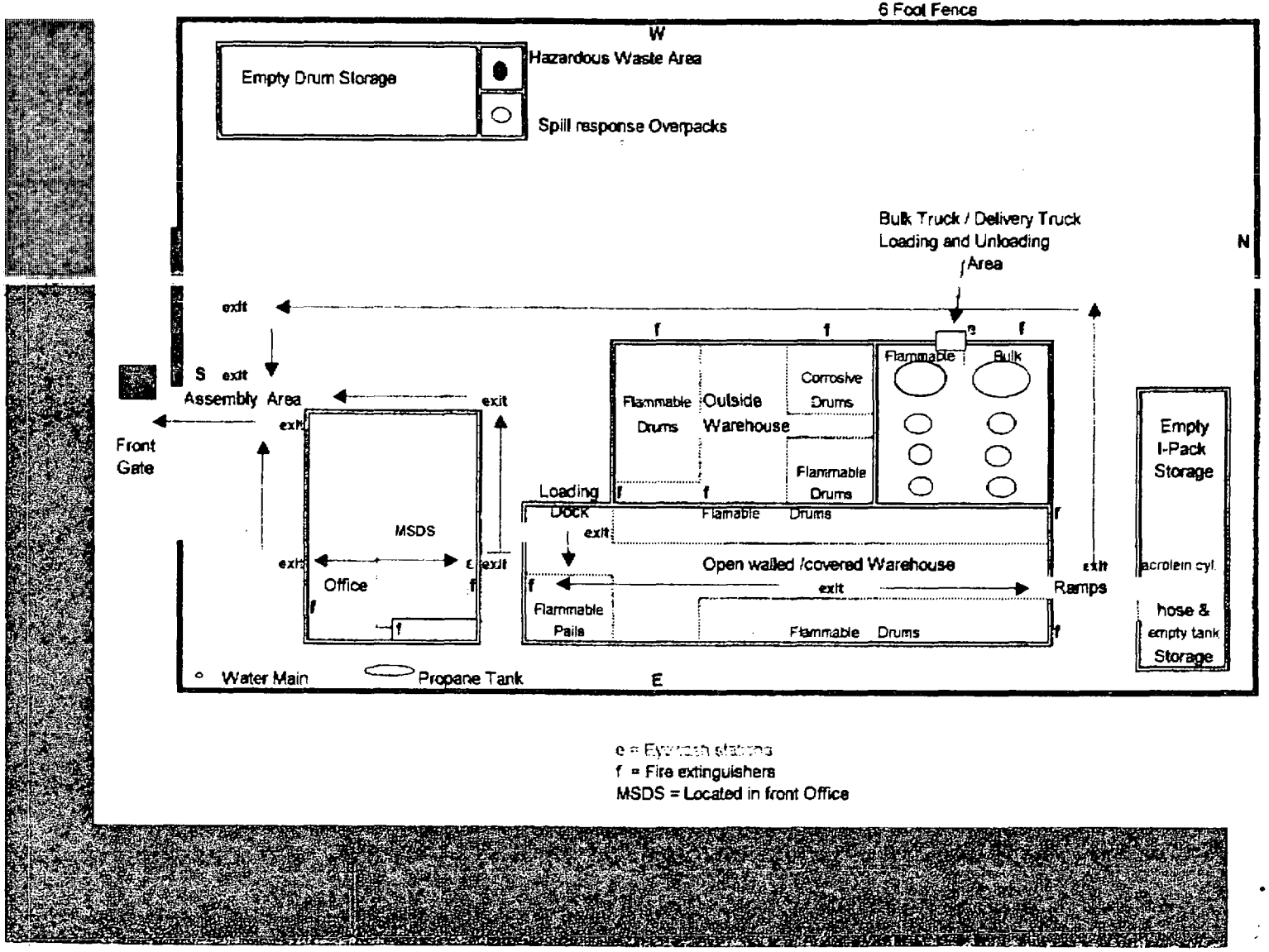
Any information made available to the EPA will also be sent to the Water Pollution Control Division of the appropriate State Agency.

APPENDIX A.
FACILITY PLOT

*** see attachment next page**

exit

Bloomfield, N. M. Warehouse, Emergency Equipment, Site Layout and Exits



APPENDIX B.
STORAGE FACILITY MAINTENANCE RECORDS

* see warehouse facility records file

APPENDIX C.
STORAGE AREA INSPECTION FORMS

* See warehouse facility records file

APPENDIX D.
POLLUTION INCIDENT LOG

*** see spill response files**

APPENDIX E.
EMPLOYEE TRAINING RECORDS

*** see training files**

APPENDIX F.
JOB TITLES AND DESCRIPTIONS

*** see safety files**

APPENDIX G.
REPORTABLE QUANTITIES

*** refer to table 2-4**

APPENDIX H.
EVACUATION PLAN

*** see appendix A facility plot attachment**

APPENDIX J – Depth to Groundwater Information

State of New Mexico Hydrologic Report 365. Depth to groundwater is approximately 180 feet with 2000-4000 mg/L of TDS. This information was obtained from previous renewal applications.

APPENDIX K – Facility Closure Plan

Baker Petrolite Corporation's (BPC) Bloomfield, NM facility consists of developed commercial real estate. The building and land are solely owned by BPC. Should BPC cease conducting business at this site, all chemicals, wastes, and other materials regulated by the OCD, OSHA, and the EPA will be removed form the site and disposed of according to regulation. The office, warehouses, and other permanent structures will be sold as part of the site improvements.

The Bloomfield, NM facility does not have any other water contaminant discharges to either the ground or below the surface of the ground. OCD guidelines will be followed in reporting and cleaning up any ground contamination in the event of a reportable accidental release from chemical handling and transportation activities during the operational life of the facility. OCD cleanup guidelines address soil and groundwater remediation from such occurrences. Further post-closure maintenance plans, monitoring plans, and financial assurance are not deemed necessary.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 5/23/08

or cash received on _____ in the amount of $ 100 00

from Baker Hughes

for GW-135

Submitted by: Lawrence Romero Date: 6/5/08

Submitted to ASD by: Lawrence Romero Date: 6/5/08

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

BAKER HUGHES BUSINESS SUPPORT SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
HOUSTON,TX 77267-4427
(281)209-7500

Check Information

Check No. / Date
001186789 / 05/23/2008
Your account with us
166889

Document	Your document	Date	Gross amount	Deductions	Net amount
Payment is made on behalf of Baker Petrolite Corp., .					
1900506632	522200802	05/22/2008	100.00	0.00	100.00
permit fee for bloomfield, nm discharge permit					
Sum total			100.00	0.00	100.00

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, May 20, 2008 1:38 PM
To: 'Rosson, Lacy'
Cc: Price, Wayne, EMNRD
Subject: RE: GW-135 Filing Fee

Dear Ms. Rosson:

Our Environmental Bureau Chief asked me to inform you that Baker Petrolite must submit the filing fee of $100 for your permit renewal application (GW-135) within 10 days (i.e., by Friday, May 30, 2008). The internal financial process within Baker Petrolite cannot be considered when assessing compliance with the New Mexico Oil Conservation Division (OCD) Rules. Failure to comply in a timely manner may result in enforcement action by the OCD against Baker Petrolite.

Please submit the filing fee to:

Edward J. Hansen
Oil Conservation Division
EMNRD
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Please make the check or money order payable to: **Water Quality Management Fund**

If you have any questions regarding this matter, please call me at 505-476-3489.

Thank you for your cooperation in the matter.

From: Rosson, Lacy [mailto:Lacy.Rosson@bakerpetrolite.com]
Sent: Wednesday, April 02, 2008 3:08 PM
To: Hansen, Edward J., EMNRD
Cc: Price, Wayne, EMNRD
Subject: RE: GW-135 Filing Fee

I'm really sorry for the delay. I still have not heard back from our accounting group after many attempts at contacting them if this vendor set up is complete. I'm still hoping to have a check cut by Monday. I'm very sorry for the delay. Thanks for your patience.

Lacy Rosson, CHMM
Environmental Programs Manager
281-275-7354

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Friday, March 21, 2008 4:26 PM
To: Rosson, Lacy
Cc: Price, Wayne, EMNRD
Subject: GW-135 Filing Fee

Lacy,

Our Bureau Chief (Wayne Price) said you called a couple weeks ago to let him know that you will be sending your filing fee of $100 for your Discharge Permit (GW-135) Renewal Application. We have received the Application, but not the filing fee. Please submit the filing fee a.s.a.p. to:

Edward J. Hansen
Oil Conservation Division
EMNRD
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Please make the check or money order payable to: **Water Quality Management Fund**

If you have any questions regarding this matter, please call me at 505-476-3489.

Thank you for your cooperation in the matter.

BAKER HUGHES

Baker Petrolite

12645 West Airport Blvd.
Sugar Land, Texas 77478
P.O. Box 5050
Sugar Land, Texas 77487-5050
Tel 281-276-5400
Fax 281-275-7385

February 22, 2008

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St Frances Drive
Santa Fe, NM 87505

Re: Permit Number GW135 renewal

To Whom It May Concern:

Enclosed is the Discharge Plan Application for the Baker Petrolite Corporation facility located at 100 Montana Street in Bloomfield, NM. The facility's emergency response and SPCC plans are currently under review. Each plan will be updated and certified within the next 90 days.

If you have any questions or concerns, please feel free to contact me at 281-275-7354.

Sincerely,
BAKER PETROLITE CORPORATION

Lacy Rosson

Enclosure

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: Renewal Discharge Permit Number GW 135

2. Operator: Baker Petrolite Corporation

   Address: 100 Montana, Bloomfield, NM 87413

   Contact Person: Allan Mashburn Phone: 432-789-3351

3. Location: /4 NW /4 Section 3 Township 29 North Range 11 West
   Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

6. Attach a description of all materials stored or used at the facility.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

11. Attach a contingency plan for reporting and clean-up of spills or releases.

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Ann Barker Title: Interim Director HSEQ&RA

Signature: Ann R Barker Date: 2/22/08

E-mail
Address: LACY.ROSSON@BAKERPETROLITE.COM

Discharge Plan Application Information

APPENDIX A – TOPO MAP

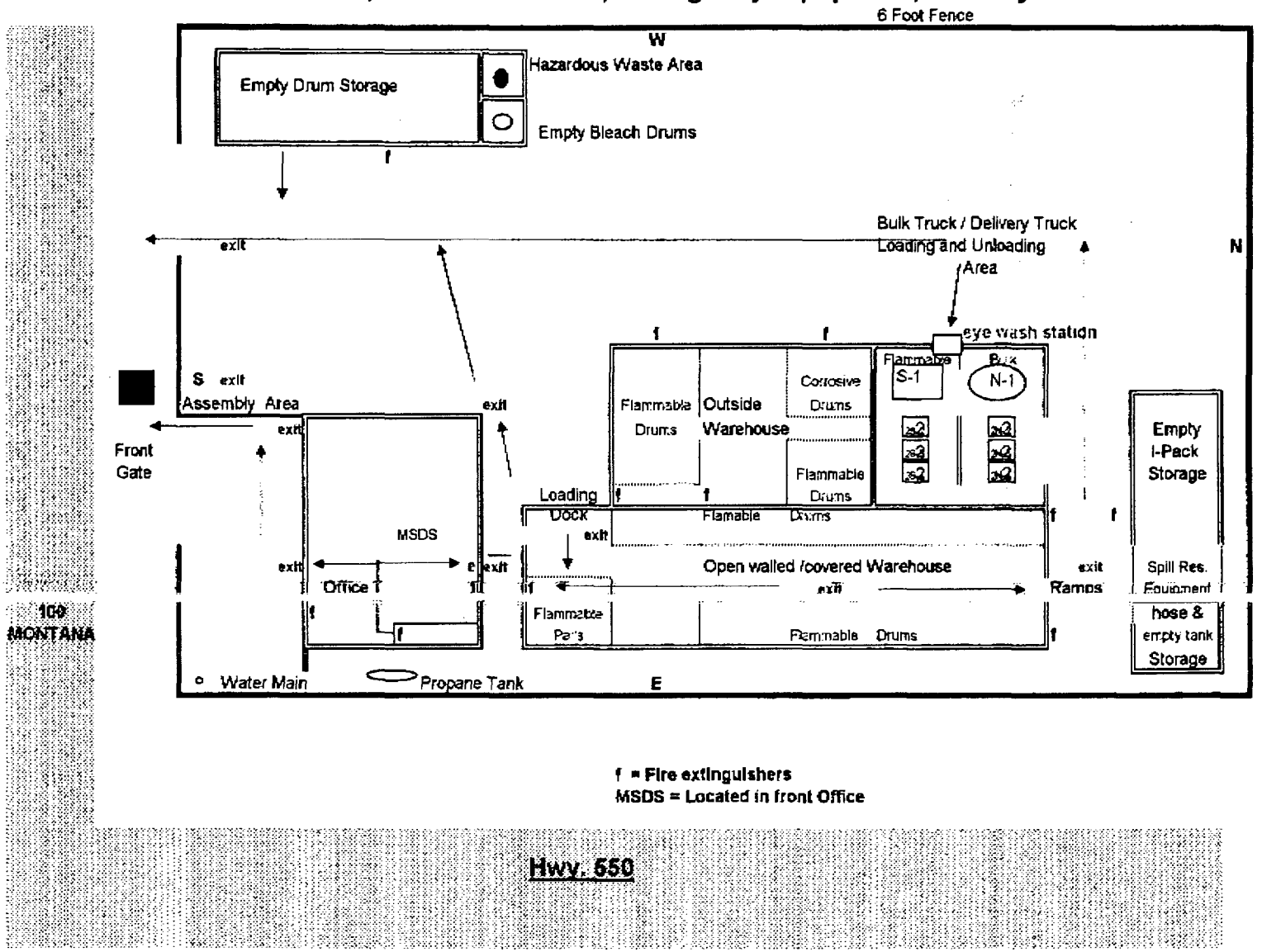
APPENDIX B – Owner

Baker Petrolite Corporation
12645 W Airport Blvd
Sugar Land, Texas 77478
281-276-5400

APPENDIX C – Facility Diagram

exit

Bloomfield, N. M. Warehouse, Emergency Equipment, Site Layout and Exits



f = Fire extinguishers
MSDS = Located in front Office

APPENDIX D – Product List

Material / SLoc	Material Description / Unrestr. use / Total value	Stock Unit / Curr	Stock in transfer / Total value	Plnt Name 1 / In quality insp. / Total value	Restricted-use / Total value	Blocked / Total value	Returns / Total value
BWA02613-10	WA02613 WETTING AGENT			1178 BPC, Bloomfield			
0001	1.000	DRM	0.000	0.000	0.000	0.000	0.000
	346.43	USD	0.00	0.00	0.00	0.00	0.00
BWA03012U-10	WA03012U WETTING AGENT			1178 BPC, Bloomfield			
0001	14.500	DRM	0.000	0.000	0.000	0.000	0.000
	4,949.72	USD	0.00	0.00	0.00	0.00	0.00
BWAW273-10	WAW0273C WATERFLOOD/COMBIN			1178 BPC, Bloomfield			
0001	40.500	DRM	0.000	0.000	0.000	0.000	0.000
	4,990.82	USD	0.00	0.00	0.00	0.00	0.00
BWCW1610-10	WCW1610 COMBINATION INHIBITOR			1178 BPC, Bloomfield			
0001	7.791	DRM	0.000	0.000	0.000	0.000	0.000
	2,036.96	USD	0.00	0.00	0.00	0.00	0.00
BWCW4488-60	ENVIROSWEET WCW4488			1178 BPC, Bloomfield			
0001	2	TB	0	0	0	0	0
	367.06	USD	0.00	0.00	0.00	0.00	0.00
BWCW4526-10	WCW4526 COMBINATION INHIBITOR			1178 BPC, Bloomfield			
0001	63.303	DRM	0.000	0.000	0.000	0.000	0.000
	13,381.67	USD	0.00	0.00	0.00	0.00	0.00
BWCW5827-10	WCW5827 WETTING AGENT			1178 BPC, Bloomfield			
0001	3.000	DRM	0.000	0.000	0.000	0.000	0.000
	585.72	USD	0.00	0.00	0.00	0.00	0.00
BWLC23-10	WLC23 FOAMER			1178 BPC, Bloomfield			
0001	1.068	DRM	0.000	0.000	0.000	0.000	0.000
	339.12	USD	0.00	0.00	0.00	0.00	0.00
BWLC821-00	WLC821 A-SOL P-38			1178 BPC, Bloomfield			
0001	45,822.840	LB	0.000	0.000	0.000	0.000	0.000
	26,119.01	USD	0.00	0.00	0.00	0.00	0.00
BWLC821-10	WLC821 A-SOL P-38			1178 BPC, Bloomfield			
0001	68.339	DRM	0.000	0.000	0.000	0.000	0.000
	16,568.14	USD	0.00	0.00	0.00	0.00	0.00
BXC102W-00	X-CIDE 102W INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	73.210	LB	0.000	0.000	0.000	0.000	0.000
	63.97	USD	0.00	0.00	0.00	0.00	0.00
BXC102W-10	X-CIDE 102W INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	99.052	DRM	0.000	0.000	0.000	0.000	0.000
	42,219.99	USD	0.00	0.00	0.00	0.00	0.00
BXC107W-00	X-CIDE 107W INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	26,449.230	LB	0.000	0.000	0.000	0.000	0.000
	26,070.96	USD	0.00	0.00	0.00	0.00	0.00
BXC107W-10	X-CIDE 107W INDUSTRIAL BACTER.			1178 BPC, Bloomfield			
0001	35.090	DRM	0.000	0.000	0.000	0.000	0.000
	16,217.54	USD	0.00	0.00	0.00	0.00	0.00
BXC150-10	X-CIDE (R) 150 IND BACTERICIDE			1178 BPC, Bloomfield			
0001	5.182	DRM	0.000	0.000	0.000	0.000	0.000
	3,977.70	USD	0.00	0.00	0.00	0.00	0.00

Material / SLoc SL	Material Description / Unrestr.-use Stock Unit / Total Value Crcy	Stock in transfer / Total value	Plnt Name 1 / In quality insp. / Total value	Restricted-use / Total value	Blocked / Total value	Returns / Total value
BAY80-10	AY0080 KCI SUBSTITUTE		1178 BPC, Bloomfield			
0001	1.000 DRM	0.000	0.000	0.000	0.000	0.000
	278.96 USD	0.00	0.00	0.00	0.00	0.00
BCGO118-10	CGO118 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	10.500 DRM	0.000	0.000	0.000	0.000	0.000
	4,378.19 USD	0.00	0.00	0.00	0.00	0.00
BCGO200-10	CGO200 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	8.000 DRM	0.000	0.000	0.000	0.000	0.000
	3,140.96 USD	0.00	0.00	0.00	0.00	0.00
BCGO49-10	CGO49 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	25.211 DRM	0.000	0.000	0.000	0.000	0.000
	7,386.07 USD	0.00	0.00	0.00	0.00	0.00
BCGO50-10	CGO50 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	26.073 DRM	0.000	0.000	0.000	0.000	0.000
	8,297.21 USD	0.00	0.00	0.00	0.00	0.00
BCGO61-10	CGO61 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	21.545 DRM	0.000	0.000	0.000	0.000	0.000
	5,263.44 USD	0.00	0.00	0.00	0.00	0.00
BCGW437-10	CGW437 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	4.000 DRM	0.000	0.000	0.000	0.000	0.000
	1,686.44 USD	0.00	0.00	0.00	0.00	0.00
BCGW9107-10	CGW9107 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	35.927 DRM	0.000	0.000	0.000	0.000	0.000
	5,999.44 USD	0.00	0.00	0.00	0.00	0.00
BCLW3060-10	SURFSWEEP (TM) CLW3060		1178 BPC, Bloomfield			
0001	10.456 DRM	0.000	0.000	0.000	0.000	0.000
	1,900.07 USD	0.00	0.00	0.00	0.00	0.00
BCLW3069-10	CLW3069 CLEANER		1178 BPC, Bloomfield			
0001	1.000 DRM	0.000	0.000	0.000	0.000	0.000
	89.04 USD	0.00	0.00	0.00	0.00	0.00
BCLW9805-10	CLW9805 CLEANER		1178 BPC, Bloomfield			
0001	1.000 DRM	0.000	0.000	0.000	0.000	0.000
	94.05 USD	0.00	0.00	0.00	0.00	0.00
BCLW9805-20	CLW9805 CLEANER		1178 BPC, Bloomfield			
0001	4 PL1	0	0	0	0	0
	27.32 USD	0.00	0.00	0.00	0.00	0.00
BCORRSTICKS-60	CORROSION STICKS		1178 BPC, Bloomfield			
0001	1 TB	0	0	0	0	0
	115.20 USD	0.00	0.00	0.00	0.00	0.00
BCRO195-10	CRO195 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	16.795 DRM	0.000	0.000	0.000	0.000	0.000
	5,789.07 USD	0.00	0.00	0.00	0.00	0.00
BCRO381-10	CRO381 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	1.164 DRM	0.000	0.000	0.000	0.000	0.000
	336.29 USD	0.00	0.00	0.00	0.00	0.00

Material	Material Description		Plnt Name 1			
BCRS935-10	CRS935 WATER TREATING PELLETS		1178 BPC, Bloomfield			
0001	2.000	DRM	0.000	0.000	0.000	0.000
	2,475.00	USD	0.00	0.00	0.00	0.00
BCRW100-10	CRW100 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	3.000	DRM	0.000	0.000	0.000	0.000
	1,141.56	USD	0.00	0.00	0.00	0.00
BCRW37-10	CRW37 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	19.000	DRM	0.000	0.000	0.000	0.000
	5,794.43	USD	0.00	0.00	0.00	0.00
BCRW9110-10	CRW9110 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	9.628	DRM	0.000	0.000	0.000	0.000
	2,402.73	USD	0.00	0.00	0.00	0.00
BCRW9133-10	CRW9133 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	63.161	DRM	0.000	0.000	0.000	0.000
	11,331.73	USD	0.00	0.00	0.00	0.00
BCRW9145-10	F.O.A.M. (TM) CRW9145 FOAMER		1178 BPC, Bloomfield			
0001	4.000	DRM	0.000	0.000	0.000	0.000
	1,180.76	USD	0.00	0.00	0.00	0.00
BCRW9150-10	CRW9150 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	19.000	DRM	0.000	0.000	0.000	0.000
	6,981.74	USD	0.00	0.00	0.00	0.00
BCRW9152-10	CRW9152 CORROSION INHIBITOR		1178 BPC, Bloomfield			
0001	4.000	DRM	0.000	0.000	0.000	0.000
	1,506.32	USD	0.00	0.00	0.00	0.00
BDFO119-10	DFO119 DEFOAMER		1178 BPC, Bloomfield			
0001	1.500	DRM	0.000	0.000	0.000	0.000
	622.40	USD	0.00	0.00	0.00	0.00
BDFO3009-10	DFO3009 DEFOAMER		1178 BPC, Bloomfield			
0001	1.000	DRM	0.000	0.000	0.000	0.000
	244.55	USD	0.00	0.00	0.00	0.00
BDFO3043U-10	DFO3043U		1178 BPC, Bloomfield			
0001	5.000	DRM	0.000	0.000	0.000	0.000
	1,802.15	USD	0.00	0.00	0.00	0.00
BDFO91-10	DFO91 DEFOAMER		1178 BPC, Bloomfield			
0001	6.000	DRM	0.000	0.000	0.000	0.000
	1,749.72	USD	0.00	0.00	0.00	0.00
BDMO146-10	DMO0146F DEMULSIFIER		1178 BPC, Bloomfield			
0001	5.634	DRM	0.000	0.000	0.000	0.000
	1,907.36	USD	0.00	0.00	0.00	0.00
BDMO295-10	DMO0295G DEMULSIFIER		1178 BPC, Bloomfield			
0001	49.510	DRM	0.000	0.000	0.000	0.000
	19,934.19	USD	0.00	0.00	0.00	0.00
BDMW2336-10	DMW2336D DEMULSIFIER		1178 BPC, Bloomfield			
0001	0.613	DRM	0.000	0.000	0.000	0.000
	186.00	USD	0.00	0.00	0.00	0.00

Material		Material Description			Plnt Name 1			
SLoc	SL	Unrestr.	Base Unit	Stock in transfer	In quality insp.	Restricted-use	Blocked	Returns
		Total Value	Crcy	Total Value	Total value	Total value	Total value	Total value
BFMS305-20		FMS305 WATER TREATMENT STICK			1178 BPC, Bloomfield			
0001		1	PL1	0	0	0	0	0
		216.00	USD	0.00	0.00	0.00	0.00	0.00
BFMS325-70		FMS325 FOAM STICK			1178 BPC, Bloomfield			
0001		4	AP	0	0	0	0	0
		540.00	USD	0.00	0.00	0.00	0.00	0.00
BFMS5391-20		FMS5391 FOAM STICK			1178 BPC, Bloomfield			
0001		2	PL1	0	0	0	0	0
		163.00	USD	0.00	0.00	0.00	0.00	0.00
BFMW2-10		F.O.A.M. (TM) FMW2 FOAMER			1178 BPC, Bloomfield			
0001		43.904	DRM	0.000	0.000	0.000	0.000	0.000
		17,508.04	USD	0.00	0.00	0.00	0.00	0.00
BFMW25-10		F.O.A.M. (TM) FMW25 FOAMER			1178 BPC, Bloomfield			
0001		5.000	DRM	0.000	0.000	0.000	0.000	0.000
		1,759.20	USD	0.00	0.00	0.00	0.00	0.00
BFMW3074-10		FMW3074			1178 BPC, Bloomfield			
0001		1.000	DRM	0.000	0.000	0.000	0.000	0.000
		94.72	USD	0.00	0.00	0.00	0.00	0.00
BFMW500-10		FMW500 FOAMER			1178 BPC, Bloomfield			
0001		22.291	DRM	0.000	0.000	0.000	0.000	0.000
		10,109.42	USD	0.00	0.00	0.00	0.00	0.00
BHSW4118-00		HSW4118 SULFIDE SCAVENGER			1178 BPC, Bloomfield			
0001		80,317.615	LB	0.000	0.000	0.000	0.000	0.000
		42,407.74	USD	0.00	0.00	0.00	0.00	0.00
BHSW4118-10		HSW4118 SULFIDE SCAVENGER			1178 BPC, Bloomfield			
0001		5.998	DRM	0.000	0.000	0.000	0.000	0.000
		1,687.12	USD	0.00	0.00	0.00	0.00	0.00
BHSW700-10		PETROSWEET HSW700 SCAVENGER			1178 BPC, Bloomfield			
0001		112.753	DRM	0.000	0.000	0.000	0.000	0.000
		28,845.63	USD	0.00	0.00	0.00	0.00	0.00
BMD2934-10		MD 2934 (CRO C 618B)			1178 BPC, Bloomfield			
0001		2.000	DRM	0.000	0.000	0.000	0.000	0.000
		1,546.36	USD	0.00	0.00	0.00	0.00	0.00
BOSW5200-10		OSW5200 OXYGEN SCAVENGER			1178 BPC, Bloomfield			
0001		16.018	DRM	0.000	0.000	0.000	0.000	0.000
		1,957.40	USD	0.00	0.00	0.00	0.00	0.00
BPAO100-10		PAO100 PARAFFIN SOLVENT			1178 BPC, Bloomfield			
0001		25.008	DRM	0.000	0.000	0.000	0.000	0.000
		5,636.56	USD	0.00	0.00	0.00	0.00	0.00
BPAO103-10		PAO0103F PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001		65.915	DRM	0.000	0.000	0.000	0.000	0.000
		17,141.19	USD	0.00	0.00	0.00	0.00	0.00
BPAO2000-10		PAO2000 PARAFFIN DISPERSANT			1178 BPC, Bloomfield			
0001		8.250	DRM	0.000	0.000	0.000	0.000	0.000
		2,482.10	USD	0.00	0.00	0.00	0.00	0.00

Material / SLoc	Material Description / Unrestr. / Total value	Base Unit / Curr.	Stock in transfer / Total value	Plnt Name 1 / In quality insp. / Total value	Restricted-use / Total value	Blocked / Total value	Returns / Total value
BPAO31-10	PAO31 PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001	5.000	DRM	0.000	0.000	0.000	0.000	0.000
	1,605.80	USD	0.00	0.00	0.00	0.00	0.00
BPAO42-10	PAO42 PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001	11.000	DRM	0.000	0.000	0.000	0.000	0.000
	3,256.33	USD	0.00	0.00	0.00	0.00	0.00
BPAO480-10	PAO480F PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001	4.432	DRM	0.000	0.000	0.000	0.000	0.000
	1,604.03	USD	0.00	0.00	0.00	0.00	0.00
BPAO77-10	PAO0077F PARAFFIN INHIBITOR			1178 BPC, Bloomfield			
0001	17.227	DRM	0.000	0.000	0.000	0.000	0.000
	4,933.65	USD	0.00	0.00	0.00	0.00	0.00
BPFR23-00	METHANOL			1178 BPC, Bloomfield			
0001	10,077.600	LB	0.000	0.000	0.000	0.000	0.000
	1,813.97	USD	0.00	0.00	0.00	0.00	0.00
BPFR549-10	SODIUM HYPOCHLORITE,10% SOL.			1178 BPC, Bloomfield			
0001	4.000	DRM	0.000	0.000	0.000	0.000	0.000
	399.76	USD	0.00	0.00	0.00	0.00	0.00
BPFR83-10	PFR0083 XYLENE			1178 BPC, Bloomfield			
0001	0.018	DRM	0.000	0.000	0.000	0.000	0.000
	4.23	USD	0.00	0.00	0.00	0.00	0.00
BRE4894HSS-20	ENVIROSWEET (R) WCW4894			1178 BPC, Bloomfield			
0001	0.500	PL1	0	0	0	0	0
	287.87	USD	0.00	0.00	0.00	0.00	0.00
BRE7629CRO-10	RE7629CRO			1178 BPC, Bloomfield			
0001	83.000	DRM	0.000	0.000	0.000	0.000	0.000
	39,315.44	USD	0.00	0.00	0.00	0.00	0.00
BSCW237-10	SCW237 SCALE INHIBITOR			1178 BPC, Bloomfield			
0001	21.045	DRM	0.000	0.000	0.000	0.000	0.000
	7,287.46	USD	0.00	0.00	0.00	0.00	0.00
BSCW2600-10	SCW2600 SCALE INHIBITOR			1178 BPC, Bloomfield			
0001	2.846	DRM	0.000	0.000	0.000	0.000	0.000
	826.28	USD	0.00	0.00	0.00	0.00	0.00
BSCW299-10	SCW299 SCALE INHIBITOR			1178 BPC, Bloomfield			
0001	17.936	DRM	0.000	0.000	0.000	0.000	0.000
	4,556.83	USD	0.00	0.00	0.00	0.00	0.00
BSCW4754-20	SCW4754 SCALE INHIBITOR PELLET			1178 BPC, Bloomfield			
0001	45	PL1	0	0	0	0	0
	15,750.00	USD	0.00	0.00	0.00	0.00	0.00
BSCW4863-10	SCW4863 SCALE INHIBITOR			1178 BPC, Bloomfield			
0001	2.000	DRM	0.000	0.000	0.000	0.000	0.000
	665.68	USD	0.00	0.00	0.00	0.00	0.00
BSRW6911-10	SRW6911 SCALE REMOVER			1178 BPC, Bloomfield			
0001	38.000	DRM	0.000	0.000	0.000	0.000	0.000
	14,983.02	USD	0.00	0.00	0.00	0.00	0.00

Material Plant SL	Material Description Unrestr. use stock Unit Total value Ccy	Stock in transfer Total value	Plnt Name 1 In quality insp. Total value	Restricted-use Total value	Blocked Total value	Returns Total value
BXC302-10	X-CIDE 302 INDTRL BACTERICIDE		1178 BPC, Bloomfield			
0001	35.802 DRM	0.000	0.000	0.000	0.000	0.000
	11,982.79 USD	0.00	0.00	0.00	0.00	0.00
BXC307-10	X-CIDE 307 INDTRL BACTERICIDE		1178 BPC, Bloomfield			
0001	18.424 DRM	0.000	0.000	0.000	0.000	0.000
	4,487.76 USD	0.00	0.00	0.00	0.00	0.00
BXC370-10	X-CIDE 370 INDUSTRIAL BACTER.		1178 BPC, Bloomfield			
0001	1.908 DRM	0.000	0.000	0.000	0.000	0.000
	745.32 USD	0.00	0.00	0.00	0.00	0.00
BXC408-10	X-CIDE 408		1178 BPC, Bloomfield			
0001	0.018 DRM	0.000	0.000	0.000	0.000	0.000
	5.94 USD	0.00	0.00	0.00	0.00	0.00
BXC535-10	X-CIDE (R) 535		1178 BPC, Bloomfield			
0001	1.809 DRM	0.000	0.000	0.000	0.000	0.000
	1,183.27 USD	0.00	0.00	0.00	0.00	0.00
BXC600-40	X-CIDE 600 INDUSTRIAL BACTER.		1178 BPC, Bloomfield			
0001	26.438 BOX	0	0	0	0	0
	8,074.17 USD	0.00	0.00	0.00	0.00	0.00
* Total						
	518,141.28 USD	0.00	0.00	0.00	0.00	0.00

APPENDIX E – Present Sources of Effluent and Solid Wastes

There are no sources of effluent waste water or other sanitary waste, from this facility. Inventory which is deemed unsuitable for sale is profiled and disposed of according to State and Federal regulation.

APPENDIX F – Procedure for Liquid and Solid Waste

GPP 410

SECTION TITLE: Waste Management	**SECTION:** 410 **PAGE:** 1 of 14
ISSUE DATE: 1 October 2006	**REVISION:** 2

PURPOSE:	This procedure provides guidance for handling, storing, and disposing of wastes. In all cases, compliance with applicable local regulatory requirements determined to be more stringent or not included in this procedure shall govern.
SCOPE:	This procedure applies to all BPC locations worldwide.
HS&E IMPACTS:	Failure to follow this procedure may result in non-compliance with both BPC procedure and applicable environmental regulations.
ADDITIONAL REFERENCES:	USEFM 9 - Waste Management USEFM 13 - Waste Minimization BHI HS7E MS Operational Control – Waste Management and Minimization
DEFINITIONS:	**Disposal** – The discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid or hazardous waste into or on land or water such that the waste may enter the environment or be emitted into the air or discharged into any body of water including ground waters. **Generator** – The entity generating the waste. **Process Knowledge** – Understanding process inputs and outputs to determine composition of a waste. **Recycling** – Using, reusing, or reclaiming materials/waste including processes that regenerate a material or recover a usable product and minimize waste generation. **Source Reduction** – Any practice that reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment prior to recycling, treatment, and disposal or reduces the hazards associated with the release of such substances, pollutants, or contaminants. **Treatment** – Any method designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste or to recover energy or material resources from the waste or to render such waste non-hazardous, or less-hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. **Waste** – Non-product outputs of processes and discarded products that have no economically viable use, must be managed responsibly and in accordance with applicable laws and regulations. **Waste Minimization** – The reduction, to the extent feasible, of waste that is subsequently treated, stored, and disposed. Waste minimization includes any source reduction or recycling activity, undertaken by a generator, resulting in the reduction of the total volume or quantity of waste, or the reduction of toxicity of waste; or both, so long as the reduction is consistent with the goal of minimizing the present and future threat to human health and the environment.
APPROVED BY:	Reggie Kennedy
POSITION:	Director, HSE/Q&RA Department

1.0 Responsibility

1.1 It is the responsibility of appropriate **Facility/Site/Area Managers (FSA)** to communicate these procedures, adhere to these requirements and provide training to all personnel under their supervision.

1.2 It is the responsibility of **BPC Personnel** to review, understand and adhere to the procedures outlined in this document for the management of wastes.

1.3 It is the responsibility of the **HSE/Q&RA Department** to develop waste management procedures and assist BPC personnel with implementation.

2.0 Waste Management Requirements

BPC facilities generate different types of wastes such as process, lab, paper and office trash, empty containers, and contaminated soil and debris. Some of these wastes may be considered hazardous depending on the respective local, regional or country regulations and may require special handling procedures. Specific countries may require registration of facilities that generate hazardous waste. In these cases, a hazardous waste generator identification number may be issued.

Local, regional and country requirements for disposal of wastes vary greatly throughout the world. For facilities implementing the BPC HS&E MS, compliance tasks to meet these requirements are included on each facility's Register of Legislation and the current List of Tasks and must be considered in the Waste Management Plan (Reference HS&E MS Level 2 Core Procedure 320). BPC procedure regarding proper disposal of hazardous wastes should be used as a baseline or minimum requirement in areas where local, regional or country regulations are nonexistent or not enforced. Contact the FSA HS&E representative if you have any questions regarding a specific local, regional or country regulation.

3.0 Hazardous Waste

BPC prefers not to operate any permitted disposal sites, and prohibits the disposal of hazardous waste on BPC property, as well as the transportation of hazardous waste using company vehicles. This section provides the minimum requirements that must be followed at all BPC facilities that generate hazardous waste.

3.1 Hazardous Waste Determination

Most local, regional or country regulations require the generator to determine if a generated waste is hazardous or non-hazardous. In many areas of the world, wastes are considered hazardous if they meet either of three criteria: (1) if they pose a fire hazard, 2) are corrosive or reactive, or (3) if they pose a danger (e.g., toxic) to human health or the environment. Hazardous waste may be determined by referring to the physical characteristics of the material on the MSDS, by conducting a laboratory analysis for flash point, pH, reactivity, and toxicity, or by applying process knowledge of the generator. If unable to classify the waste as hazardous by one of these methods, contact the HSE/Q&RA Department for assistance.

3.2 Storage Requirements

A hazardous waste storage area must be designated (e.g., posted signs on at least two sides) and be secured. This can be accomplished by fencing the waste storage area or the entire site. Access to these areas must be limited to authorized personnel only. Documented inspections shall be conducted periodically, on a monthly basis at a minimum, or in accordance with applicable laws and regulations. The inspection process must include evaluation for proper labeling, container integrity, and evidence of spills or leaks. Deficiencies shall be corrected in a timely fashion (usually within 24 hours).

3.2.1 Waste Drums or Totes must be:

- in good condition, and compatible with the waste contained therein
- closed while in storage
- labeled clearly with the words "Hazardous Waste" and the appropriate hazard classification (e.g., flammable, corrosive, etc.)
- marked with the accumulation date, type of waste and applicable waste codes
- grounded before filling flammable materials
- elevated above the storage base either by pallets or other devices for drums, where possible
- kept within secondary containment that is free of cracks and deterioration

3.2.2 Stationary Hazardous Waste Tanks must be:

- compatible with contents, and grounded, if the waste is flammable
- labeled "Hazardous Waste" with the appropriate hazard designation (e.g., flammable, corrosive, etc.)
- placed within secondary containment capable of containing 110% of the largest tank's volume

Note: The storage of hazardous waste in tanks may trigger additional regulatory requirements.

3.3 Waste Disposal Approval Process

BPC facilities that generate hazardous waste must insure the waste is being properly managed/disposed by the external treatment, storage or disposal facility (TSDF). Therefore, all TSDFs should be audited or evaluated prior to disposing of any BPC waste. Drum reconditioners/disposal firms must also be audited and approved. BPC HS&E representative may complete the audit and approval process, or an evaluation can be conducted by local Representatives. The minimum requirements for local evaluation are 1) a review of the final disposal (disposition) method of the waste, 2) regulatory compliance at the TSDF site, and 3) economic health of the TSDF company. Approved waste vendors and drum reconditioners are shown on the BPC Waste Vendor list posted on the HSE/Q&RA Intranet.

Note: Landfills and other onsite disposal is prohibited at Baker Petrolite.

After the TSDF has been evaluated and determined to be the best option, all required waste approval documentation should be completed for each waste type. Required documentation will vary throughout the world and will generally be determined by the TSDF. This documentation, often termed a waste profile or waste characterization, must include the following: 1) the process generating the waste, 2) identification of components and percentage composition, 3) physical characteristics, and 4) applicable waste codes. In many cases the TSDF will provide their own waste approval form; therefore, contact these firms well in advance of shipping hazardous waste off site. For those who do not, an example waste characterization form is provided as Appendix A. Waste approval documentation must be reviewed annually (signed and dated), and updated when necessary. Some firms may also request a sample of the waste to assist in the acceptance procedures.

The use of waste brokers is discouraged, since they often use a variety of disposal firms over which BPC may have little or no control. If a waste broker must be used because assistance is needed to properly handle and characterize waste, a written contract or agreement must be established with the broker. This agreement must stipulate that only disposal sites approved by BPC may be used (refer to the BPC Waste Vendor List for audited sites with an acceptable ranking).

3.4 Hazardous Waste Transportation

Hazardous Waste shall only be transported by authorized/registered waste transportation companies in accordance with local and regional regulatory requirements. Hazardous waste shipments shall be accompanied by required documentation, which may include a manifest, bill of lading, etc.

3.5 Empty Container Disposal

Local, regional or country regulations will define when a container is empty and can be disposed of as non-hazardous waste. In areas of the world where an empty container is not defined, BPC considers a container empty if:

- for drums or pails, no more than 1 inch (2.5 centimeters) of residue remains at the bottom
- for portable or stationary tanks, no more than 0.3 percent of the material by weight remains
- for containers that held a compressed gas, the pressure in the container should be near atmospheric

Documentation showing the proper disposal of empty containers (e.g., drums) must be maintained at the facility. This documentation may include Bills of Lading, recycling certificates, etc.

3.6 Accumulation Time

Local, regional or country rules may specify the time for which a waste may remain onsite. If a time is not specified by rule, then all waste must be removed from the site within 12 months of it being deemed unusable and therefore waste.

4.0 Non-Hazardous Waste

4.1 Waste Storage Procedures

All waste containers should remain closed and labeled as non-hazardous waste. Salvage and scrap piles should be well organized.

4.2 Non-Hazardous Chemical Wastes

Many liquid wastes (especially industrial or commercial chemicals) can damage landfills and contaminate the groundwater. Therefore, BPC prohibits liquid wastes (with the exception of food wastes) from being placed in the facility trash and later into a landfill, where other feasible disposal options exist. Appropriate handling includes:

- Liquids must be totally removed using acceptable methods such as stabilization (i.e., cement admixture or adsorbent) or drying. Once this is accomplished, the materials may be disposed of off-site in a landfill.
- Liquids may be drained into a drum, and treated, recycled or properly disposed.
- Biological wastes, such as materials contaminated with human blood and syringes, should be segregated from regular facility trash. These materials should be placed in approved containers and disposed according to local, regional or country requirements or by incineration.

4.3 Contaminated Soil and Debris

No absorbent, soil or debris that is heavily contaminated with chemicals can be placed in the facility trash unless the material is determined to be non-hazardous, per section 3.1. In order to place materials in the facility trash, the following must be true:

- Absorbent, soil or debris must be completely dry and liquid free. Stabilization may be required.
- Large quantities of contaminated absorbents, soils or debris should be placed in separate disposal bins. These bins should be completely enclosed and the interior underlain with a plastic liner. If bins are not available or feasible the contaminated material may be placed temporarily in storage piles. These piles must be completely covered and underlain by an impermeable (i.e., plastic) liner.

4.4 Non-Hazardous Wastewater

4.4.1 Wastewater may be treated in several ways including:

- On-site evaporation
- Collection and transfer to an on-site wastewater treatment plant (an authorization or permit may be required for this practice)
- On-site spray field application, where allowable and authorized
- Discharge to an off-site wastewater treatment plant via a sewer system.
- Recycle into facility processes where appropriate and in accordance with applicable local regulatory requirements
- Recycling into customer system (production well, tank battery, etc) provided the customer has been informed of, and has approved, the practice. A signed Customer Approval letter will also be kept on file at the facility for each waste recycled. A template for this letter is available as Appendix B.

4.4.2 Sanitary Wastewater

- Sanitary waste may be discharged to a septic system or local sewer system.
- No chemically contaminated fluids shall be discharged to an onsite or offsite septic system.

4.5 General Refuse

The local landfill or collection agency should be contacted to determine what materials can be accepted for disposal at the site. Paper, plastic, wood, food wastes and miscellaneous trash comprise a large portion of facility wastes on a day-to-day basis. Therefore, these wastes should be managed as follows:

- It is recommended that general refuse be placed in totally enclosed bins or containers to limit rodent infestation and control wind blown trash.
- Burning of trash is not recommended.
- Paper, aluminum, glass and cardboard should be separated for recycling whenever possible.
- Ensure aerosol cans are empty prior to placing in the trash.
- Grease and oil rags should be returned to the local cleaning service, whenever possible. Ensure that rags are dry prior to disposal in the trash.
- Paint wastes and brushes should be totally dry prior to placement in facility trash bins. Empty solvent cans/pails and lab waste containers should be completely aerated prior to disposal.

4.6 Other Wastes that Require Special Handling

4.6.1 Tires and Batteries

Should be used for their intended purpose only, and returned to the nearest recycler or service center at the end of their useful life, when possible. It is recommended that vehicle maintenance be performed off-site to ensure proper return of the used tires and batteries.

4.6.2 Scrap Metal

Should be clean and free of solvents or oil when in storage at the site.

4.6.3 Construction Debris

Should be clean and free of contamination. Whenever possible, this material should be crushed and used as road aggregate at the site.

4.6.4 Dead Vegetation

Should be removed on a regular basis and the use of pesticides, diesel, oil or other chemicals not intended for use as an herbicide is prohibited. The vegetation should be mulched at the site and used as plant bedding materials. Otherwise, this waste should be composted. Burning of vegetation is not recommended and is prohibited in areas where flammable or combustible materials are stored.

4.6.5 Asbestos Wastes

Asbestos materials must only be removed or encapsulated by experienced and qualified removal contractors when it first becomes friable.

4.6.6 Used Equipment

Electronic equipment such as computers, printers, monitors, etc. should not be placed in the trash bins. These items should be sent to a recycling/reclamation site or appropriate disposal facility.

4.6.7 Low-Level Radioactive Wastes

Low-level radioactive wastes, such as lithium batteries, should be returned to the nearest recycler whenever possible. When recycling opportunities do not exist, these materials shall be encapsulated in approved radioactive waste containers and disposed at an approved waste disposal facility. While onsite, all containers must be labeled as containing "Low-Level Radioactive Wastes." Naturally Occurring Radioactive Materials (NORM) must be handled and disposed in accordance with the appropriate local, regional or national requirements. NORM wastes shall not be handled by BPC personnel but only by qualified outside disposal contractors.

5.0 Used Oil

In some cases BPC facilities will generate used oil or used oil filters from process equipment. These facilities must comply with all local, regional or country used oil management standards.

5.1 Burning in Space Heaters

BPC sites may burn used oil in oil-fired space heaters provided that it is generated by the facility and the combustion gases from the heater are vented to the ambient air.

5.2 Used Oil Filters

Oil and oil filters shall be changed at a vehicle service center, by qualified contractor, or appropriate BPC maintenance personnel, in accordance with the provisions below. Used oil filters do not have to be treated as hazardous waste provided the oil is drained. Used oil can be removed from the filters by one of the following methods:

- Puncturing the filter anti-drain back valve or the filter dome end and hot-drain
- Hot-draining and crushing
- Dismantling and hot-draining
- Any other equivalent method that will remove used oil

5.3 Oil Discharge Prohibition

The intentional discharge of used oil into a sewer, drainage system, septic tank, surface water or groundwater, watercourse, or marine water is prohibited. Used oil must not be applied to roads or land for dust suppression, weed abatement, or other similar uses that introduce used oil into the environment.

6.0 Waste Tracking and Reporting

BPC facilities that generate 1000 kilograms or 2200 pounds of any type of waste per year are required to track and assess waste generation and disposal annually by compiling a waste summary chart. Waste tracking is recommended as a best practice for locations consisting only of offices; however, it is not required. Annual waste summaries may also be required by local regulations.

The waste summary information can be used to establish the priority for waste reduction goals. It may also be useful to document the basis for establishing priority of some waste streams for reduction. When identifying one or more "prioritized" waste streams, critical considerations should include the quantity of each waste generated, the waste handling method and associated environmental impact, feasibility of reduction, available technology, cost, and the views of interested stakeholders such as employees, the community, and regulatory agencies.

7.0 Waste Minimization & Waste Reduction Goals

Waste minimization can result in significant benefits for BPC and the environment. Therefore, BPC is committed to waste minimization whenever feasible. A waste minimization program will:

- Minimize quantities of regulated waste, thereby reducing waste management and compliance costs
- Improve product yields
- Improve production efficiency
- Reduce environmental impact from waste disposal

The preferred methods of waste minimization are source reduction and recycling. The initial step towards developing a minimization program is a review of the wastes generated and the amounts. After an inventory of waste is created, an individualized waste minimization plan should be developed. The format of the plan is the responsibility of the FSA. Each plan shall be reviewed annually and revised as needed to continually reduce waste. Refer to GPP 415 - Waste Minimization for a Waste Minimization Plan template.

Facilities shall establish annual waste reduction goals based on periodic assessment and critical consideration of the factors specified above and including regulatory requirements and BPC and BHI HS&E goals.

Waste reduction goals must include identification of one or more waste streams selected for reduction, the amount of reduction desired (e.g., percentage, etc.), measurement criteria, action plans, assigned responsibilities, target dates, and should be monitored and evaluated for success. The target dates must include a beginning date or baseline year, an end date when the goal will be achieved, and timelines for significant milestones. Action plans for waste reduction should be documented in the facility Waste Minimization Plan.

8.0 Training

Personnel handling hazardous waste must receive appropriate training (e.g., proper segregation, labeling, handling, transportation, disposal, etc.) prior to conducting any related work and annually thereafter. Awareness training is required for all operations personnel and any additional employees (e.g., administrative) with responsibility for hazardous waste within 6 months of hire and annually thereafter. Documentation of training must be kept on file at the facility.

9.0 Records

For record retention requirements, reference GPP 160 - Record Retention.

- Waste characterizations, profiles and/or analyses
- Waste Disposal records (manifests or equivalent)
- Waste Minimization Plan
- Customer Approval letters
- Evaluations of Waste Disposal (TSDFs) and Recycling firms
- Waste training documentation
- Empty Container Recycling or Disposal Documentation
- Register of Legislation
- Annual Waste Summary
- Annual Waste Reduction Goals

Appendix A - WASTE CHARACTERIZATION & ANALYSIS

(This document is only to be used as a general characterization of waste when there is no other waste characterization available).

I. WASTE MATERIAL CHARACTERIZATION & ANALYSIS:

Generator Name: _____

Address: _____

Technical Contact: _____

II. GENERAL INFORMATION:

Material Name: _____

A. Does the waste contain any radioactive materials? (i.e., NORM)_____

B. What is the physical state of the material? (liquid, sludge, etc.) and indicate the volume

_____

C. Detailed description of process gathering waste:
Bulk: ف Poly Tank: ف Drum: ف Other: ف

III. MATERIAL COMPOSITION

Chemical Component	Concentration or Range (Min % Max%)

IV. PHYSICAL CHARACTERISTICS

Physical State: ___Solid _____Semi-Solid ____Liquid
Free Liquid: ___Yes _____No
Odor: ___None _____Mild ____Strong
Flash Point: ___<73 °F _____ 73 °F –140 °F ____140 °F-200°F ____>200 °F
pH: _____<2 _____>12.5 ____Actual pH:
Specific Gravity/Density: _____

Appendix B - Customer Approval Letter for Samples

Date: include here

Customer Name and Address:
Include here

Re: Baker Petrolite Corporation
Waste Minimization Program

Dear Mr./Ms:

BPC, in accordance with sound environmental practices and the Total Quality Management System, has initiated a corporate-wide Waste Minimization Program. The purpose of this program is two-fold. First it reduces the disposal of byproducts from our service operations, therefore limiting their impact on the environment. Second, these practices enable BPC to provide affordable services to our customers without impacting the quality of our products. With these purposes in mind, BPC has identified the *(Insert Customer Name)* Operations at *(Insert Customer location)* as an acceptable candidate for the return of performance test samples from our operations.

These samples, which include production liquids from your operations, will consist primarily of field bottle test samples containing produced oil and/or water with parts per million (ppm) levels of treatment chemicals. Laboratory test samples consisting of crude oil and/or produced water may also be included. With your approval, this material will be returned to the *(note area of production system, i.e. wells, bad oil tank, sump, etc. here)* at your facility to be mixed with your normal production fluids, and ultimately refined. Please be advised that these materials have been, and will be annually evaluated to ensure that they are nonhazardous. By certifying this notification, you concur with our BPC Waste Minimization Program and agree to accept production test liquids into your operation. Thank you so much for your participation in this Waste Minimization plan, and our ISO 14001 *(remove if not applicable)* waste reduction objective.

Certified by: _____ Title: _____ Date: _____

Sincerely,

BPC Representative Name
Title

Appendix C- Customer Approval Letter – Wastewater

Date: include here

Customer Name and Address:

Include here

Re: Baker Petrolite Corporation
Waste Minimization Program

Dear Mr./Ms:

BPC, in accordance with sound environmental practices and the Total Quality Management System, has initiated a corporate-wide Waste Minimization Program. The purpose of this program is two-fold. First, it reduces the disposal of byproducts from our service operations, therefore limiting their impact on the environment. Second, these practices enable BPC to provide affordable services to our customers without impacting the quality of our products. With these purposes in mind, BPC has identified the *(Insert Customer Name)* Operations at *(Insert Customer location)* as a potential candidate for re-using recyclable from our operations.

This water will be used as a substitute for the product makeup and pretreatment solutions, and will consist primarily of freshwater with trace amounts of chemical residues from stormwater containment areas or from tank rinsates. Please be advised that these materials have been, and will be annually evaluated to ensure that they are nonhazardous. By certifying this notification, you concur with our BPC Waste Minimization Program and agree to accept production test liquids into your operation. Thank you so much for your participation in this Waste Minimization plan, and our ISO 14001 *(remove if not applicable)* waste reduction objective.

Certified by: _____ Title: _____ Date: _____

Sincerely,

BPC Representative Name
Title

APPENDIX G

No modifications are proposed to the existing collection/treatment/disposal system.

APPENDIX H – Inspection Logs

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

Housekeeping: aisles, walkways, floors, and workstations

1. Are aisles, walkways, floors, and workstations kept clean, dry and free of debris?
   (YES) NO N/A

2. Are drains and floor openings guarded by a cover?
   (YES) NO N/A

3. Are rags and other soiled materials disposed of properly?
   (YES) NO N/A

4. Are all toilets and washing facilities clean and sanitary?
   (YES) NO N/A

5. Are spilled materials cleaned up immediately?
   (YES) NO N/A

6. Are trip hazards (wires/ropes/tools, material on floor, or poor flooring condition) minimized?
   (YES) NO N/A

Housekeeping: storage pads

1. Are storage pads clean, with drums stacked in rows with access between each row?
   (YES) NO N/A

2. Are drums in good condition if in use, and cleaned and disposed of if empty?
   (YES) NO N/A

3. Are drums labeled as to content, free from leaks, in good condition, and closed?
   (YES) NO N/A

4. Are hazardous waste storage areas segregated and identified?
   (YES) NO N/A

5. Are shelving and supports of adequate capacity, stable, and in good condition?
   (YES) NO N/A

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

Housekeeping: yards, parking

1. Are equipment storage yards maintained and dumpsters emptied frequently to prevent spillage?
   (YES) NO N/A
2. Are speed limits posted, parking spots indicated, and are these markings observed?
   (YES) NO N/A

Housekeeping: tools, equipment

1. Are tools and equipment (both company and employee-owned) inspected, repaired or replaced when necessary, maintained in good condition, and stored in appropriate areas?
   (YES) NO N/A
2. Are guards in place for tools and machines and are they properly adjusted?
   (YES) NO N/A
3. Is personal protective equipment available for use, maintained in a sanitary condition, and stored correctly in areas where it is required?
   (YES) NO N/A
4. Are cranes, forklifts, and other motorized equipment used appropriately, in good repair, and part of a periodic (minimum quarterly) inspection process?
   (YES) NO N/A
5. Have employees received training in the proper use of tools and personal protective equipment?
   (YES) NO N/A

Work Environment: Ergonomics

1. Are workstations arranged so that twisting, reaching, repetitive motion, bending, and lifting/pulling/pushing of material is minimized?
   (YES) NO N/A
2. Is furniture adjusted, positioned, and arranged to minimize strain on the body?
   (YES) NO N/A
3. Can the job task be performed without eyestrain or glare?
   (YES) NO N/A

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

Work Environment: lights, ventilation

1. Is lighting adequate for the tasks performed and work areas properly illuminated?
   YES (NO) N/A *Not all lights are working.*

2. Are lights shielded and clean?
   (YES) NO N/A

3. In hazardous locations, are lights, fans and fixtures appropriate for the potential hazards?
   (YES) NO N/A

4. Is ventilation adequate for the area?
   (YES) NO N/A

5. If a fan is less than 7 ft. off the ground, are rotating and moving parts adequately guarded?
   (YES) NO N/A

Work Environment: temperature, humidity

1. Where temperature extremes are present, are controls, job rotation, or personal protective equipment present and used to protect against those extremes?
   (YES) NO N/A

2. Where temperature extremes are present is an adequate amount of water supplied and available to employees?
   (YES) NO N/A

Work Practices

1. Were any violations of safety policies (lockout/tagout, wearing PPE, dress codes, food/drink consumption in designated locations, etc.) observed?
   YES (NO) N/A

2. Was horseplay, lack of personal protective wear, working unsafe observed?
   YES (NO) N/A

3. Were vehicles operated at posted safe speeds?
   (YES) NO N/A

4. When required, are trucks and rail cars properly chocked?
   (YES) NO N/A

5. Have documented PPE (Hazard Assessments been initiated and on file?
(YES) NO N/A

Office

1. Are trip hazards and spills addressed to minimize accidents?
(YES) NO N/A

2. Are file drawers closed, weight evenly distributed throughout the filing cabinet, and storage on top of files minimized?
YES NO N/A

3. Are electrical circuits installed to minimize overloading of outlets?
(YES) NO N/A

4. Are employees instructed in proper first aid and other emergency procedures?
YES (NO) N/A No first aid

5. Are hallways kept clear of materials to allow unhindered passage to exits?
(YES) NO N/A

6. Have emergency escape procedures and routes been developed and communicated to all employees?
(YES) NO N/A

7. Are building alarms, smoke detectors, and fire systems properly maintained and tested regularly?
(YES) NO N/A

Facilities

1. Are electrical cords in good condition, not spliced, defective, frayed and are plugs grounded?
(YES) NO N/A

2. Is any temporary wiring used to service permanently installed equipment?
YES (NO) N/A

3. Is there a clear space of at least 3 feet in front of all electrical boxes?
(YES) NO N/A

4. Are portable electrical tools and equipment grounded or double insulated?
(YES) NO N/A

Baker Petrolite

Self Inspection Checklist Form

Use with Global HS&E Best Practices and Procedures GPP-315
Form Name: GPP-315_FRM A Revision 1

5. Are bonding/grounding cables in place where required?
(YES) NO N/A

6. Are electrical enclosures such as switches, receptacles, junction boxes, etc. provided with tight fitting covers or plates?
(YES) NO N/A

7. Where required (i.e. hazardous areas, hot/cold extremes, elevated surfaces, loading capacities, confined spaces, low clearances, personal protective equipment required) are appropriate signs posted?
(YES) NO N/A

8. Are elevated working surfaces more than 30 inches above the floor or ground equipped with standard guardrails?
YES (NO) N/A

9. Are ladders regularly inspected and maintained in good condition with joints between steps and side rails tight and hardware and fittings securely attached? Are mobile ladder stands also inspected?
(YES) NO N/A

Chemical Safety

1. Has the Laboratory HS&E Program been published and distributed where laboratory operations exist?
YES NO (N/A)

2. Has an HS&E Laboratory Representative been appointed as part of the Laboratory HS&E Program?
YES NO (N/A)

3. If so, is that individual knowledgeable of responsibilities?
YES NO (N/A)

4. Are bulk storage containers of flammable liquids grounded and bonded?
(YES) NO N/A

5. Are compressed gas cylinders marked, secured and stored upright with caps (valve protectors) in place when not in use?
(YES) NO N/A

6. Have employees received Hazard Communication Training and do they know where the Material Safety Data Sheets are located?
   (YES) NO N/A

7. Is there a written Hazard Communication Program specific for the facility?
   (YES) NO N/A

8. Are laboratories clean, hoods inspected on a regular basis, and employees trained on the Chemical Hygiene Plan?
   (YES) NO N/A

9. Are NO SMOKING areas established in areas where flammable or combustible materials are used or stored?
   (YES) NO N/A

10. Are employees required to use personal protective clothing and equipment when handling chemicals (e.g., gloves, eye protection, and/or respirators)?
    (YES) NO N/A

11. Are written procedures available for the appropriate selection and use of PPE?
    (YES) NO N/A

Emergency Response, First Aid

1. Are first aid kits, spill kits, eyewashes, and safety showers readily accessible, inspected periodically (minimum monthly), and visible?
   (YES) NO N/A

2. Are evacuation routes posted (primary and secondary) and do employees know their routes/responsibilities during evacuation?
   (YES) NO N/A

3. Is there a written emergency action plan specific for this facility?
   (YES) NO N/A

4. Is the emergency action plan reviewed by employees and updated periodically?
   (YES) NO N/A

Records/paperwork

1. Are all injuries appropriately reported immediately?
   (YES) NO N/A

2. Are safety training and meetings documented?
   (YES) NO N/A

3. Are records kept of inspections made to identify unsafe conditions and work practices with corrective measures identified?
   YES NO N/A

Fire Protection

1. Are employees aware of the fire hazards of the material and processes to which they are exposed?
   YES NO N/A

2. Is the local fire department familiar with your facility, location and specific hazards?
   YES NO N/A

3. Are automatic sprinkler systems and their components inspected periodically (minimum quarterly) as required?
   YES NO N/A

4. Are portable fire extinguishers provided in adequate number and type, mounted safely, periodically inspected, (minimum monthly) and annually certified?
   YES NO N/A

5. Are fire extinguishers mounted in readily accessible locations?
   YES NO N/A

6. Are employees instructed in the use of fire extinguishers and fire protection procedures?
   YES NO N/A

APPENDIX I – Emergency Response Plan

BAKER HUGHES

Baker Petrolite

FIRE, OIL, AND HAZARDOUS SUBSTANCE

EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

LOCATION: BLOOMFIELD, NEW MEXICO

This Plan was developed to conform with the following applicable laws: Clean Water Act (CWA) (40 CFR § 112), Resource Conservation and Recovery Act (RCRA) (40 CFR § 265, Subpart D), Superfund Amendments and Reauthorization Act (SARA) (40 CFR § 300, Subpart C) and Occupational Safety and Health Act (OSHA § 1910.38). As such, it will replace previous SPCC and Emergency Response plans retained at the site.

ANNUAL REVIEW

Reviewed and Approved: Jimmy Johnson Date: 9/11/02

Reviewed and Approved: _____ Date: 8/14/03 9.9.03

Reviewed and Approved: _____ Date: 7/27/04 1-27-04

BAKER PETROLITE CORPORATION
FIRE, OIL AND HAZARDOUS SUBSTANCE
EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

TABLE OF CONTENTS

1.0 CERTIFICATION*

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR § 112, attest that this SPCC plan has been prepared in accordance with good engineering practices.

(Seal) Printed Name of Registered Professional Engineer

Date Signature of Registered Professional Engineer

Registration Number State Issued

*This certification is necessary when storing oil in excess of 660 gallons or 1,320 cumulative in a contiguous area at the site.

Johnson, James M.

From: Fisketjon, John R.
Sent: Wednesday, September 11, 2002 11:24 AM
To: Johnson, James M.
Subject: RE: Copy of the SPCC plan for editing

The ERP / ASMP covers this. Also you do not need to get an engineer to certify this plan.
John

-----Original Message-----
From: Johnson, James M.
Sent: Wednesday, September 11, 2002 11:09 AM
To: Fisketjon, John R.
Subject: FW: Copy of the SPCC plan for editing

John, I opened this SPCC document and it is the same as my ERP. Is there a different SPCC plan to be on file or does the ERP cover this?

-----Original Message-----
From: Pierre, Lizanna M
Sent: Monday, July 08, 2002 9:41 AM
To: Johnson, James
Cc: Fisketjon, John; Palacios, Nicholas
Subject: Copy of the SPCC plan for editing

James,

On 6/25/02, John Fisketjohn requested that I send you a Microsoft word copy of the Baker Petrolite Spill Control and Countermeasures Plan, so that you can edit the document to meet your facility's needs.

Enclosed is the plan that you requested. Let me know if I can be of further assistance.
<< File: Insert1.doc >>

P.S.
Nick, can you add a link to the document above (in Microsoft word) to the Environmental Field Manual, Section 4, Insert4-1. Thanks.

Liz Pierre
HSE Specialist
Baker Petrolite
281-276-5878
lizanna.pierre@bakerpetrolite.com

Johnson, James M.

From: Johnson, James M.
Sent: Tuesday, January 14, 2003 8:30 AM
To: Pierre, Lizanna M
Subject: RE: Is Bloomfield participating in the corporate tank integrity testing proposal?

warehouse.xls

Lizanna, I have attached a facility plan that shows our bulk tank locations. They have their own secondary containment. Description as follows: N-1 6000 gallon capacity CGO-49.....N-2 4000 gal. cap. DIESEL.....N-3 4000 gal. cap. XC-102W.....N-4 4000 gal. cap. XC-307.....S-1 6000 gal. cap. PFR-23.....S-2 4000 gal. cap. CRW-1500.....S-3 4000 gal. cap. CRO-195.....S-4 4000 gal. cap. XC-102W.
S-1 & N-1 Tanks are 10' in Height 12' in Diameter.
S-2, S-3, S-4, N-2, N-3 and N-4 are 10' in Height 10' in Diameter.
All tanks are double walled, white, vertical, above ground, 120 gallon max. fill rate, 32 gallon withdraw rate and have 2" open vent to atmosphere.
All tanks have a 1' from top of shell working height. Roofs are fixed.
Please let me know if you need more information. THANKS, JIMMY JOHNSON

—Original Message—
From: Pierre, Lizanna M
Sent: Monday, January 13, 2003 8:03 AM
To: Johnson, James M.
Subject: RE: Is Bloomfield participating in the corporate tank integrity testing proposal?

Jimmy,

As you may be aware, the Spill Prevention, Control, and Countermeasures (SPCC) regulations were revised in August 2002. Because of this, tank integrity testing will be required for certain vessels containing oils.

Please respond to the following questions no later than 1/14/03:

1. Is Bloomfield subject to the SPCC regulations revised in August, 2002?
   - If so, is Bloomfield participating in the corporate HSE/Q&RA tank integrity testing proposal (i.e. the corporate group will be sending out a consolidated RFP for tank integrity testing in hopes of getting a volume discount from the vendor for all Baker Hughes facilities that need this testing done.)?

2. In order to participate in the tank integrity testing proposal mentioned above, **I will need you to complete and return Table 2-1 of the document below no later than 1/14/03.** If this is not possible, then provide me with a total number of tanks and the size of each tank.

Thanks for your immediate attention to this matter.
<< File: SPCC Plan10_02.doc >>

—Original Message—
From: Pierre, Lizanna M
Sent: Friday, December 27, 2002 9:58 AM
To: Johnson, James M.
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

The EPA revised the SPCC regulations in August 2002. A synopsis of changes in the new regulations is attached.
<< File: SPCC changes summary.doc >>

One of the new changes requires onshore facilities to test each above ground container for integrity on a regular schedule or whenever material repairs are made. This requirement can be found online at <http://www.access.gpo.gov/nara/cfr/cfrhtml_00/Title_40/40cfr112_00.html> where it reads:

(6) Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

-----Original Message-----
From: Johnson, James M.
Sent: Friday, December 27, 2002 9:38 AM
To: Pierre, Lizanna M
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

My SPCC Plan was reviewed and approved September 11, 2002. This is the first I have heard about tank integrity testing. Please advise.

-----Original Message-----
From: Pierre, Lizanna M
Sent: Monday, December 23, 2002 9:53 AM
To: Pierre, Lizanna M; Bell, Doug M.; Ellis, Tanya C.; Rushing, Bill W.; Aprati, Gabe A; Sanchez, John A. (BPC); Harless, Michael L.; Hill, Gregg; Bigler, John M.; Wilson, Wayne K.; Reed, Curtis A.; Mashburn, Allan; Byford, Mark L.; Mullin, Mike L.; Johnson, Jimmy; Este, Fernando; Estep, Charles D.; Rosendale, Claud C.; Joseph, Janice E.; Matthies, Tom D.; Belcher, David W.; Lambert, Hal; Johnson, James M.; Geherty, Michael
Subject: RE: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

REMINDER

For those of you who have not already done so and you plan on participating in the tank integrity testing that will be coordinated by the corporate EP group, please don't forget to submit Table 2-1 of the enclosed SPCC plan and return it to me or Joe Hofbauer no later than 12/31/02.

<< File: SPCC Plan1_02.doc >>

To date, I have received input from the following locations:
Bakersfield
Kilgore
Lake City
Santa Paula
Sand Springs

-----Original Message-----
From: Pierre, Lizanna M
Sent: Thursday, October 31, 2002 4:30 PM
To: Bell, Doug M.; Ellis, Tanya C.; Rushing, Bill W.; Aprati, Gabe A; Sanchez, John A. (BPC); Harless, Michael L.; Hill, Gregg; Bigler, John M.; Wilson, Wayne K.; Reed, Curtis A.; Mashburn, Allan; Byford, Mark L.; Mullin, Mike L.; Johnson, Jimmy; Este, Fernando; Estep, Charles D.; Rosendale, Claud C.; Joseph, Janice E.; Matthies, Tom D.; Belcher, David W.; Lambert, Hal; Johnson, James M.; Geherty, Michael
Subject: COMPLETE Enclosed SPCC Plan no later than FEBRUARY 17, 2003

To all:

The Spill P evention, Control and Countermeasures (SPCC) rule was revised and published i the Federal Register on July 17, 2002. The rule became effective on August 17, 2002.

Enclosed i the updated template for the Baker Petrolite Corporation's (BPC) SPCC plan (also know as the Fire, Oil & Hazardous Substance Emergency Response & Contingenc y Plan) which should be completed by February 17, 2003 for those sites that are subject to this regulation.

<< File: SPCC Plan10_02.doc >>

In additio , a completed copy of Table 2-1 (page 8 of the enclosed document) and section 1. (page 2 of the document) should be submitted to me (Liz Pierre) or Joe Hofbauer a soon as possible, but no later than December 15, 2002, so that tank integrity t sting (a component of the revised rule) for BPC facilities can be arranged b y the corporate Environmental Programs group.

The revise SPCC regulation, in general, applies to:

- sites th at have a total aboveground storage capacity of more than 1,320 US gallons of oil
- sites th at have a total underground (completely buried) tank capacity of more than 42,000 US gallons and these tanks are NOT subject to Underground Storage Tank (UST) egulations (i.e. 40 CFR 280 or 40 CFR 281)

(For this ru e, there is a specific definition of oil and a few exemptions that are not listed here...so if ou have questions, or if you are unsure if this applies to you, please contact me (Liz Pie re) or Joe Hofbauer.

Attached b low is a summary of changes (filename: SPCC changes summary.doc) that are specific to Baker Petrolite facilities, or feel free to go to EPA's website at http://www. pa.gov/oilspill/spcc.htm for more details.

<< File: SPCC changes summary.doc >>

2.0 EMERGENCY RESPONSE AND CONTINGENCY PLAN

2.1 Site Description

BAKER PETROLITE CORPORATION (BPC) operates facilities for the manufacture of industrial and oil field chemicals. In addition, numerous district facilities blend chemicals to customer specifications and act as distribution points to local customers. At these facilities, petroleum products and hazardous materials may be stored in bulk quantities. This plan meets the requirements set forth in 29 CFR § 1910.38. The following BPC facility stores petroleum and/or hazardous materials in quantities which may require implementation of an emergency plan:

BLOOMFIELD FACILITY
Location

100 MONTANA
(Street or Post Office Box)

BLOOMFIELD
(City) (County)

NEW MEXICO, 87413
(State) (Zip Code)

(505) 632-1000
(Phone Number)

The driving directions to the location from the nearest metropolitan center are as follows:

From Farmington go 9 miles East on Hiway 64 to Bloomfield. Turn North (left) on Hiway 550. Go 3 miles to Montana. Facility is on the Northwest corner of Hiway 550 and Montana.

2.1.1 Material and Waste Inventory

Table 2-1 provides an inventory of oils and hazardous materials stored on site in quantities which, when released, may pose a threat to human health or the environment. A map plan depicting their storage locations is presented in Appendix A. Material Safety Data Sheets (MSDS) are stored on site in the facility office on the wall between the two exit doors.

2.1.2 Maintenance and Inspections

Normal maintenance for the material storage facilities will be performed by facility employees under the supervision of the District or Plant Manager. Routine maintenance will include, but not be limited to:

(1) remediation of minor spills resulting from normal site operations which pose no threat to site employees;

(2) replacement and repair of leaking fittings or valves as part of normal facility maintenance; and

(3) discharging water from storage containment areas.

The Manager or Emergency Coordinator (EC-refer to Section 2.4.2) will determine which activities can be performed by facility operators and which need be contracted due to the potential hazards involved.

Maintenance records (Appendix B) which detail modifications or repairs made to hazardous material, oil, and waste units or devices shall be held at the facility for a minimum of 3 years.

At a minimum, oil, chemical, and waste storage facilities will be inspected routinely (in accordance to the BPC Environmental Field Manual and applicable environmental laws) for:

(1) leaks, corrosion or integrity problems,
(2) accumulated liquids in containment areas,
(3) improper labeling and storage practices, and
(4) open or deteriorated containers.

An inspection record (Appendix C) will be maintained which details inspection dates, inspection results, and any remedial actions taken as a result of these inspections.

TABLE 2-1

OIL AND HAZARDOUS SUBSTANCE FACILITIES

Facility Number*	Type**	Construction Materials	Material Stored	Capacity	NFPA Rating
PETROLEUM					
Bulk Tank N-2	K 1	Steel	Kerosene	4000 gal.	0-2-0
COMMERCIAL CHEMICALS					

TABLE 2-1
(CON'T)***
OIL AND HAZARDOUS SUBSTANCE FACILITIES

Facility Number*	Type**	Construction Materials	Material Stored	Capacity	NFPA Rating
N-1	TANK	STEEL	CGO-49	6000	2-3-0
N-2	TANK	STEEL	KEROSENE	4000	0-2-0
N-3	TANK	STEEL	XC-102W	4000	3-3-0
N-4	TANK	STEEL	XC-307	4000	3-3-0
S-1	TANK	STEEL	PFR-23	6000	1-3-0
S-2	TANK	STEEL	CRW-1500	4000	1-2-0
S-3	TANK	STEEL	CRO-195	4000	2-3-0
S-4	TANK	STEEL	XC-102W	4000	3-3-0
HAZARDOUS WASTES					DATE
Hazardous waste	Drum	steel	Not profiled	55	
area	Drum	plastic	Not profiled	55	
"	1 drum	plastic	PAO2000	"	8/10/02
"	9 [illegible]	plas 5 gal	Solid Flammable	5 gal	9/10/02

Storage locations depicted in plot plan provided in Appendix A.

**Site Numbering System*
***Drum or Tank Storage*
****Make additional copies of this table as needed.*

Baker Petrolite

RCRA Waste Generation, Storage, Accumulation Log

Bloomfiled, NM Warehouse Year 2003 Page# 1

MONTH	DATE ADDED	AMOUNT ADDED	UNITS	LOGGED BY:	90 DAY STORAGE	DATE SENT TO TSDF
January			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
February			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
March			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
April			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
May			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
June			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
July			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
August			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
September	9/10/03	9	Drums, Pails, Other	BES		
	9/10/03	1	Drums, Pails, Other	"		
			Drums, Pails, Other			
October			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
November			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			
December			Drums, Pails, Other			
			Drums, Pails, Other			
			Drums, Pails, Other			

2.1.3 Fire Prevention

The site operator shall address all major work place fire hazards (i.e., storage of flammable material, welding areas and electronic panels). Once identified, proper handling and storage procedures, potential ignition source/control procedures and type of fire protection equipment available must be specifically discussed. These are as follows:

Fire Hazard	Fire Controls and Procedures
FLAMMABLES, (drums, IPACS, pails)	SIGNS (no smoking or open flames)
STATIC CHARGE (bulk tanks load/unload valves)	SIGNS (no smoking or open flames) USE STATIC LINE when loading/unloading
FLAMMABLES, (drums, IPACS, pails, bulk tanks)	FIRE EXTINGUISHERS (A- B- C) rating 20lb
ELECTRICAL PANEL	FIRE EXTINGUISHERS (A- B- C)
ELECTRICAL RECEPTACLES (out side)	FIRE EXTINGUISHERS (A- B- C) rating 20lb

2.1.4 Housekeeping

The site will control the accumulation of combustible and flammable liquids in process areas as follows:

* see waste minimization plan

All minor spills will be remediated with a minimum of 24-hours of occurrence.

2.1.5 Maintenance of Fire Protection Equipment

The site shall maintain both internal and external inspection and service programs for fire protection devices. All extinguishers/deluge systems will be inspected monthly and serviced at least annually. All other emergency equipment will be inspected accordance with the applicable sections of the BPC Safety Manual.

2.1.6 Pollution Incident Repc ts

The site shall maintain | record of pollution incidents (Appendix D). At a minimum this record will describe:

(1) date of the inc dent;
(2) nature and ext nt of the incident;
(3) internal and e: ternal notifications made, including follow-up, written reports; and
(4) actions taken t > correct the problem.

2.1.7 Employee Training

Applicable facility pers nnel responsible for managing hazardous waste, hazardous materials and oil, are required to ttend corporate hazardous waste management (40 CFR § 265) and Hazmat training course (29 CFR § 1910.120). In addition, each facility will provide a minimum of "first resp nder awareness level" training to employees during regularly scheduled safety meetin gs. This training, at a minimum, will include familiarizing employees with the emergency res onse procedures as outlined in this plan (29 CFR § 1910.120 (q)(1). This course shall be giv n to the employee within six-months of his/her date of hire and annually thereafter by a trained and qualified instructor. In addition, this training is necessary whenever this plan or t e employee duties change. No personnel shall handle any hazardous waste/material releases until this training is completed. At a minimum, the in-house training program will include re iewing this plan as it pertains to the following topics:

(1) hazardous wa: e and material management procedures;
(2) identification c f potential hazards in the work place;
(3) applicable pol ution control laws and regulations;
(4) Emergency Re sponse and Contingency Plan;
   a. initially, v hen plan is developed
   b. whenever mployees responsibilities change
   c. if the plan is changed
(5) emergency res onse procedures and reporting;
(6) emergency res onse notification and communications;
(7) site evacuatior plan and routes; and
(8) proper use of ersonnel protection equipment.

Employee Emergency Response training records will be maintained at the facility for a minimum of thirty (30) years after the employee resigns from the company. A copy of this record is presented as Appendix E.

2.2 Facility Design

2.2.1 Facility Drainage

A topographic map depicting surface water flow directions is presented as Figure 2-1. The following section discusses drainage patterns across the site, including details on out falls of facility drainage ditches and connected water bodies. Any navigable waterways or those categorized as recreational or potable within 1 mile of the site are also identified.

* see attached facility drainage flow chart – next page Figure 2-1

Water which accumulates in containment areas, dikes or sumps will not be drained to grade if there is evidence of an oil sheen, if contaminated, or if a spill occurred in the these areas. The draining of hazardous material storage areas will be done manually and only after the nature of the liquids has been ascertained (by visual or chemical examination). In any case, the employee is responsible for ensuring that no hazardous substances are released to any site drainage system.

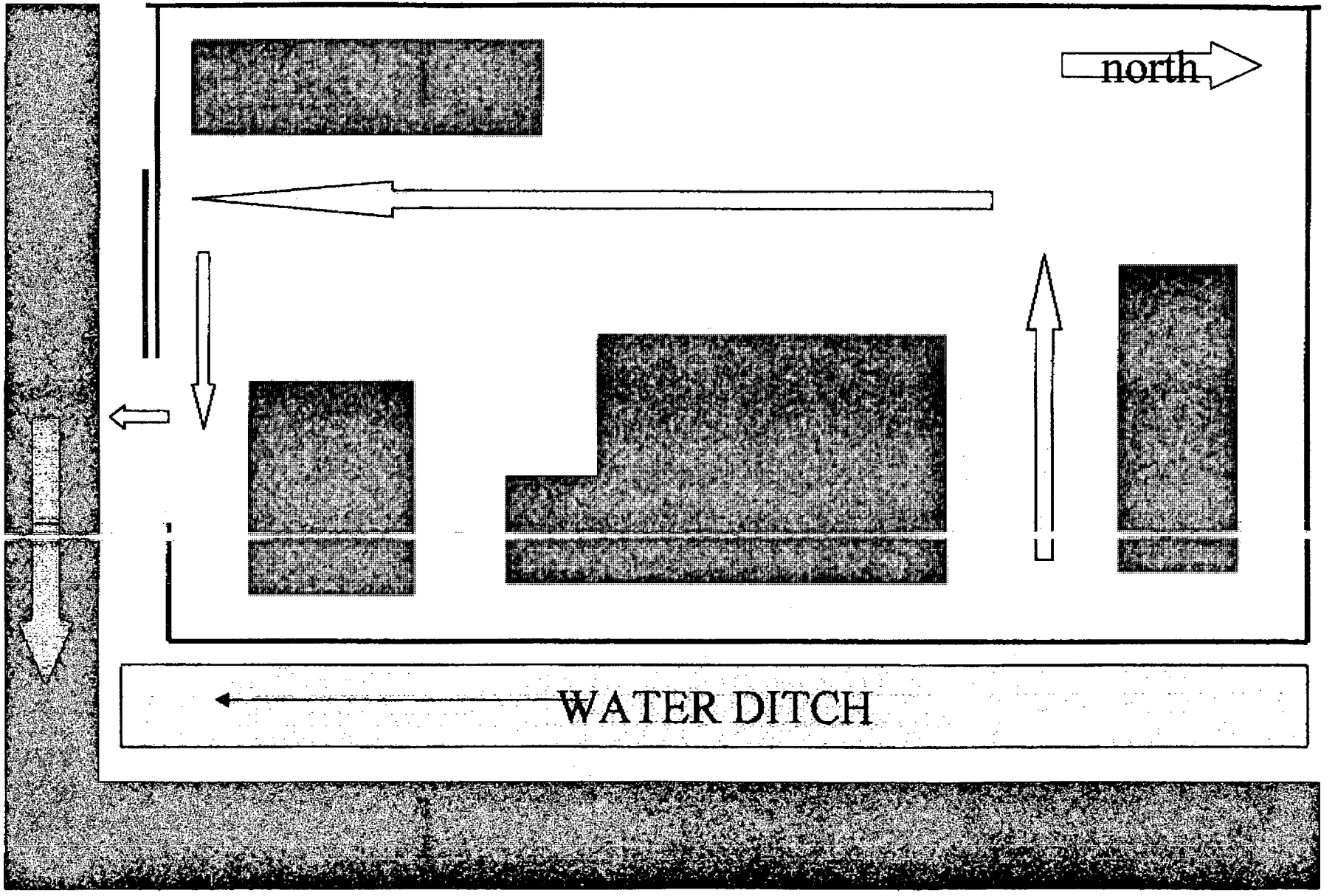
2.2.2 Spill Containment

a) Secondary Containment -

BPC has provided secondary containment in those areas which exhibit the potential for releases of harmful quantities of materials. Currently, all storage tanks containing oil or hazardous substances are bermed with concrete or earthen materials. Drum storage facilities are enclosed and underlain by concrete. The drain valves from these unit containment systems remain closed.

* there are no drain valves on any secondary containment's.

Bloomfield Facility Drainage Flowchart



Should the capacity of any containment area be exceeded as the result of a catastrophic storm event or spill, these areas will be temporarily enlarged by diking with soil or sand bags until such time as remedial activities are completed. A discussion of these activities are presented in Section 2.4.4.

b) Tank Design -

All hazardous substance oil storage units are fabricated with materials compatible with their contents. No substances will be stored in any tank if not compatible with these materials. All tanks will be routinely inspected for leaks as part of normal operating procedures. In addition, each tank shall be inspected as required in accordance to standard tank manufacturing guidelines for internal corrosion or pitting. Remedial action will be taken to correct any flaws in the tank structure as soon as they become apparent.

Underground storage tanks and sumps containing oils or hazardous materials will be tested periodically to determine if a release has occurred. Any newly installed UST shall be double-lined with interstitial monitoring devices. Newly installed sumps shall be equipped with secondary containment.

c) Unloading/Loading Areas -

Tank contents unloading/loading will be restricted to paved locations or those which have secondary containment capable of holding a single hose volume. If containment is unavailable during unloading/loading operations (due to the location of the operation):

(1) nearby open drainage ditches shall be blocked off until such time as these activities are completed;

(2) temporary berms will be constructed for the unloading/loading of large quantities of hazardous liquids; and

(3) a site employee shall be present during transfer operation.

The area beneath tank trucks shall be inspected for spills before and after unloading/loading contents.

2.2.3 Site Security and Controls

Operational areas (i.e., blending and storage facilities) are enclosed by a fence or secured to prevent unauthorized entry onto the site. Unfenced areas are monitored daily to prevent vandalism to the site. Adequate lighting will be utilized to properly monitor the operational portions of the facility.

Warning signs are posted where necessary at storage facilities and operational areas. All facility gates are locked when unattended and tank valves are locked and tagged when these units are out-of-service.

2.3 Emergency Preparedness

This section provides a generic description of emergency response procedures to be performed to address hazardous material releases and fires at the site. Each response will vary depending upon the nature and extent of the incident. However, the general protocols outlined in this document will be followed.

2.3.1 Emergency Recognition and Spill Prevention

The first line of any emergency response involves prevention. As part of the routine inspections, site employees will attempt to identify potential problems before they develop into fires and/or environmental incidents. It is the employee's duty to examine each storage facility for bulging or leaking drums, tank or piping leaks, deterioration of containment dikes, stains, spills, etc. It is also the employee's responsibility to correct these problems wherever possible and communicate to the Emergency Coordinator (EC) the extent of these problems.

Should a spill or release be evident, the employee first detecting this condition will immediately adhere to the procedures outlined in this plan. If these spills occur in the employee's work area, he/she will immediately attempt to contain the spill to the smallest possible area. If the release is large or outside the work area, the facility Hazmat team will respond.

Should a fire occur, a trained employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher by an employee trained in its use or (2) the employee is a trained member of a BPC Fire Team.

2.3.2 Communication and Alarm Systems

Should the incident occur during normal working hours, the main office will act as the command post and, under the supervision of the EC, will direct the site response. Facility telephone extensions, listed in preferred order of reporting, are as follows:

NAME	TITLE
Allan Mashburn (43[illegible])789-3351	District Manager-EC
Jimmy Johnson (50[illegible])632-1000	Driver [redacted]-Alternate EC
Bryan Enns (50[illegible])632-1000	Area Manager-Alternate EC

Facility employees will be notified of any emergency situation and imminent hazards by the EC after the nature and extent of the problem has been determined. Notification will be completed by site alarm system, telephone, two-way radio, and/or other available means of communication.

The site evacuation and emergency communication signal is as follows (be specific):

The Bloomfield Facility utilizes a portable air horn that is in the office on the wall with the MSDS books between the two exit doors. A sign on the wall next to the air horn reads as follows: **EMERGENCY ALARM....TWO LONG BLASTS.**

Should the release occur after normal working hours, the EC coordinator or his alternate will be contacted at his residence. The name and phone numbers for the EC and alternates are provided in Section 2.4.1.

2.3.3 Physical Properties of Acrolein

Acrolein is typically a mixture of the following hazardous materials:

Acrolein	CAS 107-02-8	92 percent minimum.
Hydroquinone	CAS 123-31-9	0.35 percent Max.

The remainder of the mixture consists primarily of water. For simplicity sake, the mixture will be denoted as acrolein throughout this plan. Acrolein is a colorless to light yellow liquid with a strong odor characteristic of aldehydes. A brief overview of the physical properties of acrolein is presented below.

ACROLEIN, INHIBITED, UN 1092;

Flammable with a flash point of -13 degrees F;

Flammability limits 2.8 to 31.0 percent in air;

HIGHLY REACTIVE, If heated or contaminated with acids, alkalies, or amines, the tendency for acrolein to undergo rapid exothermic polymerization increases;

Vapor almost twice as dense as air, will collect in low areas of confined spaces;

TOXIC, Acutely toxic by inhalation and skin contact;

Vapor will cause extensive and rapid eye tearing;

Reportable Quantity 0.5 gallon (1 pound);

FIRE HAZARDS: Extremely flammable. Vapors form explosive mixtures with air.

FIRE CONTROL PROCEDURES: Use foam, dry chemical, CO_2, water fog, or water spray.

Acrolein has special requirements for transportation, handling and storage. Full containers of acrolein should be stored in well-ventilated areas away from other chemicals, particularly alkalies or oxidizers. The storage area should be remote and of non-combustible construction. All electrical equipment should be Class 1, Division 2 and properly grounded. Empty containers must not be reused but returned to Baker Petrolite Corporation, Taft, California facility.

2.3.4 Physiological Effects of Acrolein

Acrolein affects the body if it is inhaled, swallowed, or comes in contact with the eyes or skin. Acute overexposure to acrolein may cause irritation of the eyes, nose, throat, lungs and skin. It may cause skin burns. It may also cause a feeling of pressure in the chest, shortness of breath, headache, dizziness, nausea, vomiting, pulmonary edema, and permanent lung damage. Effects may be delayed. Death may occur if high concentrations are inhaled.

Occasionally, skin allergies such as hives or rashes may result from exposure with acrolein.

Acrolein exhibits excellent detection qualities by virtue of its pungent odor. The following table reflects inhalation data and should not be confused with skin absorption or ingestion exposures. The table below indicates that inhalation of acrolein will produce painful and nearly intolerable conditions quickly at vapor concentrations well below the accepted dangerous levels. Because of these excellent warning properties, it is highly unlikely that workers will inadvertently overexpose themselves to harmful vapor concentrations.

INHALATION DATA

Concentration	Exposure	Probable Response
.25 (ppm)	5 minutes	Moderate irritation
1.0 (ppm)	2-3 minutes	Eye/Nose irritation
1.0 (ppm)	5 minutes	Painful irritation
5.5 (ppm)	20 seconds	Painful irritation (eye & nose)
5.5 (ppm)	1 minute	Intolerable
153.0 (ppm)	10 minutes	May be fatal

Persons with asthma, allergies or other hypersensitivities may react strongly to low concentrations of acrolein that may be tolerable and innocuous to average sensitivities. Occupational exposure limits for acrolein are presented in the following table.

OCCUPATIONAL EXPOSURE LIMITS (Parts per Million)							
Material		OSHA		ACGIH			
		PEL	CEIL	TWA	STEL	Ceiling	IDLH
Acrolein		0.1		0.1	0.1	0.1	2
Hydroquinone		2		2	2		20
OSHA:	Occupa ional Health and Safety						
ACGIH:	Americ n Conference of Governmental Industrial Hygienists						
PEL	Permiss ble Exposure Limit						
CEIL:	Maximu m instantaneous exposure ceiling						
TWA:	8-hour ime Weighted Average						
STEL:	Short T m Exposure Limit						
IDLH:	Immedi tely Dangerous to Life and Health						

2.3.5 Acrolein Detection and Monitoring

As presented below, ac olein is readily detected by odor with a detection threshold typically below the permissible e xposure limits. Therefore, the following warning properties will be suitable acrolein detecti on: For quantitative analysis of acrolein concentrations in air, direct reading colorimetric de tector tubes may be used. Gastec acrolein tube # 93, detection range 3.3 - 800 ppm, or Drag r dimethyl sulfide 1/a tube # 6728451, detection range 0.1 - 10 ppm with determination scal , located in attachment 2.

2.3.5.1 ODOR THR SHOLD

The odor th eshold will vary among humans, depending upon the olfactory sensitivity an acuteness. Detection threshold will vary between 0.05 and 0.4 ppm.

2.3.5.2 EYE IRRITA NT LEVEL

For humans, xposure of 5.5 ppm in air is intolerable in the first minute. Exposure to 1 ppm in uces tearing and will become intolerable in 4 to 5 minutes. The maximum al owable industrial exposure concentration (PEL and/or TLV) of acrolein will be sufficient to produce warning sensations and irritation. These warning prop rties can detect acrolein at or near occupational exposure limits. The 0.1 ppm exp sure limit is sufficiently low to minimize, but not entirely prevent irritation to ll exposed populations. For purposes of this plan, acrolein is considered a material with good warning properties.

2.3.6 Personnel Protection Eq ipment for Acrolein

All personnel who ma y be involved with the storage, transportation, use, disposal or emergency response of crolein must be trained in the safety and health aspects of acrolein. Personnel involved wit acrolein must have available for use, when necessary, impervious

clothing, gloves (butyl rubber or 4-H), goggles, and full-face respirators with organic vapor cartridges (refer to Respiratory Protection Guidelines Table, page 7) as necessary to prevent the possibility of contact. Clothing and leather shoes wet with liquid acrolein should be placed in closed containers for storage until proper disposal or decontamination procedures are followed. If the body is exposed to liquid acrolein, quick action must be taken to immediately wash the skin thoroughly. A full-face respirator must be worn when a possibility of exposure to liquid acrolein is present. If the eyes are subject to possible liquid acrolein exposure, an eyewash, quick drench should be provided within the immediate work area for emergency use.

The following table will provide respiratory protection guidelines for acrolein.

RESPIRATORY PROTECTION GUIDELINES

CONDITION	MINIMUM RESPIRATORY PROTECTION
Precautionary use and For emergency escape	Full-face piece chemical respirator with organic vapor cartridges
Vapor 2.0 PPM or greater	Self-contained-breathing-apparatus SCBA, pressure demand type with full-face piece
Unknown concentrations	SCBA, pressure demand, full-face piece
Fire fighting	SCBA, pressure demand, full face piece

Only MSHA/NIOSH approved equipment should be used. All personal protection equipment should be selected, used and maintained under the immediate supervision of trained personnel.

2.3.7 Acrolein Emergency First Aid Procedures

2.3.7.1 Eye Contact

If acrolein gets into the eyes, wash eyes immediately with large amounts of water for a minimum of 15-20 minutes, lifting both lower and upper eye lids occasionally. Seek medical attention as soon as possible. Do not wear contact lenses when working near acrolein.

2.3.7.2 Skin Contact

If acrolein gets on the skin, immediately flush the contaminated skin with water. If acrolein soaks through clothing, remove all contaminated clothing immediately and flush the skin thoroughly with large amounts of water. Seek medical attention as soon as possible.

2.3.7.3 Inhalation

If acrolein vapor is inhaled, move to fresh air at once. If breathing has stopped, start CPR. Keep affected person warm, dry, and at rest. Seek immediate medical attention. Administer medical oxygen.

2.3.7.3 Ingestion

If acrolein is swallowed, seek medical attention immediately. Water may be given by mouth to dilute concentration. Do not induce vomiting.

Note: All medical treatment facilities must be provided an acrolein MSDS to insure proper treatment.

Persons exposed to acrolein vapors may have a delayed reaction and experience sever irritation of the respiratory tract or other medical complications. Therefore, it is advisable to keep persons who have been exposed to high concentrations and/or persons experiencing signs and symptoms of acrolein exposure under observation for a period of 24 hours.

2.4 Personnel Responsibilities/Duties

2.4.1 Responsibilities of Employees

Actions taken by location employees during an emergency response will be limited to the those which pose no threat to their personal safety. The employee will not take any action which might be hazardous due to the nature of the release (i.e., gas, acids, etc.) without the EC's approval and appropriate personnel protection equipment (PPE).

The employee's response will vary upon the extent and nature of the incident. Small fires, minor leaks and spills (which might develop into larger environmental incidents if left un-addressed) will be remediated immediately without a formal emergency response. For larger incidents requiring outside assistance or the HazMat Team, the employee's duties will be restricted to:

(1) Limiting the magnitude of the incident (i.e., closing valves, placing adsorbent pads around spill) if possible.

(2) Contacting the EC. Remaining near the incident if not in imminent danger and providing immediate oversight until the EC arrives.

(3) Preventing the release from entering nearby surface waters, if possible.

(4) Providing security for the release area to insure that site or contract employees do not unknowingly enter this area.

(5) Sounding the alarm to nearby workers who could potentially be affected by the incident.

The responding employee should only take these actions if the release occurred in their work area.

The following critical plant activities or system shutdown will be performed by site employees prior to evacuation:

Employees working at the time of an alarm will shut off any engines / motors and close all valves applicable and proceed to muster area. The person sounding the alarm will also take the sign-in board from the wall out to the muster area with him / her.

Approved rescue and medical duties to be performed by site employees will include:

2.4.2 Emergency Coordinator and Chain-of-Command

Table 2-2 provides a list of the primary and alternate ECs for the location, including their duties, home addresses and phone numbers. They have been listed in order of preferred notification. In addition the table provides a list of the employees who may be called upon to address small and contained releases as part of a emergency response. Specific job descriptions are further outlined in Appendix F.

TABLE 2-2
LIST OF EMERGENCY RESPONSE PERSONNEL

	Name	Work Extension	Home Address	Home Phone
EMERGENCY	Allan Mashbu n	(435)789-3351	Vernal, UT	(435)789-4880
	Jimmy Johnso	(505)632-1000	Navajo Dam, N.M.	(505)632-8979
	Bryan Enns	(505)632-1000	Bayfield, CO.	(620)786-5732
ALTERNATE	Craig Smith	(505)632-1000	Farmington, N.M.	(505)324-0955
	Sean Higgins	(505)632-1000	Aztec, N.M.	(505)334-9185
EMPLOYEE RESPONSE TEAM				
HazMat Team	Jimmy Johnso	(505)632-1000	Navajo Dam, N.M.	(505)632-8979
	Donny Swearin gen	(505)632-1000	Aztec, N.M.	(505)334-8976
Rescue Team	San Juan Regio al	(505)325-5011	Farmington, N.M.	
Fire Brigade	Bloomfield Fire D ept	911 / (505)334-6622		
Security	Bloomfield Police D pt	911 / (505)334-6622		
Count Team				

2.4.3 Duties of Emergency Coordinator

The duties of the EC or his alternate are:

(1) Determine the source, character, amount, and extent of the release or incident.

(2) Assess the potential hazards to the site, environment, and neighboring community due to the incident, including possible toxic gases, hazardous runoff, etc.

(3) Sound the site alarm and/or evacuation command to alert employees, when required.

(4) Report release to the Regulatory Affairs (RA) Group in Houston in accordance with Section 2.5.

(5) Contact outside remediation services or local emergency response teams to assist with incident or injuries too serious to be addressed by site personnel.

(6) Contact Local Emergency Planning Committees (LEPC) and neighboring industries, if necessary, for assistance or to report off site releases.

(7) Commit manpower and equipment for minor incidents which can be reasonably corrected by the site personnel.

(8) Direct remediation efforts to contain and control the release in accordance to this plan.

(9) Document the remedial effort, including taking photographs if possible.

(10) Coordinate cleaning and disposal activities, including recovering usable products from the release.

(11) Ensure that all emergency equipment used during the incident is clean and fit for use prior to placing these devices back into service. Replace spent equipment where necessary.

(12) Generate follow-up incident report.

(13) As instructed, and after consulting RA, answer inquiries by the local media regarding the incident. Further information regarding media relations can be found in the Environmental Field Manual.

2.4.4 Emergency and Persona | Protection Equipment

Table 2-3 provides a lis of both Emergency Response and Personal Protection Equipment located on site which ca i be used in the event of a major spill or fire. This table also identifies storage locatic ns of this equipment as shown in the site plot plan (Appendix A).

TABLE 2-3
LIST OF EMERGENCY RESPONSE
AND PERSONAL PROTECTION EQUIPMENT

EMERGENCY RESPONSE	QUANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Fire Extinguishers	7	A – B – C rating	warehouse	20 lb. each
Hay Bales				
Oils Booms				
Chemical Absorbant (Pads/Socks/Pillows)	12	Pads, Socks & Particulate	Warehouse & Outside Response Area	100 Gallon Response
Shovels/Brooms	5	Shovels / brooms	warehouse	(3) brooms / (2) shovels
Open-Top 55-Gallon Drums	1	Steel/Seal Top	Empty IPAC Area	55 gal.
Salvage Drums	1	Overpack	Outside Response Area	65 gal.
Sump Pump				
HazMat Kit	9	Combination	Warehouse, LAB &trucks	Small response
Other (List)	100 lb.	Oil dry	warehouse	Small response
Heavy Equipment (List)				

TABLE 2-3 (CON'T)
LIST OF EMERGENCY RESPONSE
AND PERSONAL PROTECTION EQUIPMENT

PERSONNEL PROTECTION	QUANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Chemical Resistant Coveralls	9	Tyvek	C/T & Delivery Trucks	Small response
Respirators:				
(Air Purifying)	4	Full face	Office file rm.	Organic
(SCBA)	3	30 minute	Lab / driver room	30 minute
(Cartridge)	1 dozen sets	Thread type	File room	Organic vapors
(Emergency Escape)	4	Bag type	Driver room	5 minute
Chemical Resistant Gloves	1 6 dozen	PVC 14"	File room	All chemicals excluding Acrolein
Boots, Acid Resistant				
Combustible Gas Indicators				
Goggles	16	chemical	All vehicles	Eye protection
/Face Shield	9	Full face	C/T & delivery trucks	Full face protection
Other (List)				

2.4.5 Equipment Cleaning/Storage

Upon completing remedial response activities, the HazMat Team or hired contractor will be responsible for cleaning equipment and securing contaminated soils and/or water.

(1) Disposable contaminated equipment, gloves, coveralls and respirator cartridges shall be placed in 55-gallon drums or 30-gallon fiberpacks until such time as their disposal can be scheduled;

(2) Shovels, brooms, hoses, pumps, and other portable equipment shall be thoroughly rinsed using appropriate cleaning solutions in an area capable of containing all rinsates; and

(3) Larger excavation and construction vehicles such as backhoes, trucks, or graders shall also be cleaned and decontaminated using appropriate cleansers and water. Care shall be taken to collect all rinse waters for further evaluation.

After cleaning, all equipment shall be inspected by the EC to insure that it is in proper working condition.

Contaminated materials shall be stored in the following manner:

(1) Cleaning fluids or rinsates shall be collected and drummed at the site. These fluids shall be tested to determine if contaminated.

(2) Drums containing hazardous waste (including contaminated personal protection equipment and rinsate) shall be appropriately labeled and placed in the Waste Storage Area.

(3) Oil-contaminated soils will be drummed and labeled as non-hazardous materials. Large amounts of oily soils may be stored upon and covered with plastic until such time as a roll-off bin can be obtained for storage purposes.

(4) Soils contaminated with hazardous substances will be properly tested and disposed as hazardous waste, where necessary.

All materials sent off site for disposal shall be properly manifested in accordance with applicable regulatory requirements. These procedures are further detailed in the Waste Management sections of the Environmental Field Manual.

2.5 Release Notification Procedures

2.5.1 Internal Notifications

Oil spills and hazardous substance releases must be immediately reported to the RA Group in Sugarland. Should RA be unavailable, releases will be reported to one of the following numbers: 281-276-5401. Information needed in this report includes:

(1) Name and address (including county and township) of the facility;

(2) Time of incident;

(3) Nature of incident, including type of substance released, estimated quantity released, and source/cause of release. Have the Material Safety Data Sheets available;

(4) Proposed actions to contain, clean up, and remove the substance and/or actions underway.

(5) Extent of any injuries and identification of any environmental/public/personnel hazards;

(6) Personnel presently on the scene, and the name and phone number of the individual coordinating the on-site response; and

(7) Names of any agencies, BPC employees, or others (i.e., media groups) notified of the incident.

An "Incident Report" will also be completed and forwarded to these parties as soon as technically feasible by the EC.

Table 2- 4 provides a list of common materials stored at BPC sites and their related Reportable Quantities (RQ). Additional RQs are presented in Appendix G. The RA Group will determine if the release constitutes a:

(1) Reportable Quantity under CERCLA;
(2) Reportable Release under the Clean Water Act or RCRA; or
(3) Reportable Threshold Quantity under SARA Title III.

This information will be helpful in making that determination.

The EC is responsible for determining the type and quantity of material released prior to reporting the incident. This information will be used by RA to determine if Agency reporting is necessary. RA will be responsible for immediately contacting the appropriate Federal and State Authorities, if necessary.

TABLE 2-4
REPORTABLE QUANTITY

MATERIAL	EPA WASTE CODE	REPORTABLE QUANTITY
Oil	----	42 gals or sheen on water
Varsol	D001	100 lbs
Methyl Ethyl Ketone	F005, U159	5000 lbs
Xylene (Xylol)	F003, U239	1000 lbs
Toulene (Toluol)	F005, U220	1000 lbs
1,1,-Trichloroethane	F001, U159	1000 lbs
HAN	D001	100 lbs
HAS	D001	100 lbs
Acrolcin	P003	1 lb
Acetone	U002	5000 lbs
Methanol	F003, U154	5000 lbs
Sulfuric Acid	D002	1000 lbs
Isopropanol	D001	100 lbs
Fina Aromatic Solvent	---	42 gals or sheen on water

**Additional RQs are provided in Appendix G. Individual State requirements may be more stringent. Consultation with the applicable State Agency may be necessary.*

2.5.2 External Notifications

All off site releases of hazardous materials shall be reported verbally to the Local Emergency Planning Committee by the EC. In making a determination whether an off site release has occurred, the EC will consider all resulting air emissions. Names, addresses, and phone numbers of the appropriate parties are provided below:

Name	Organization	Number
Gary Johnson	Transportation & Industrial Services (TIS)	303-833-1111 (Denver, CO.)
Don Cooper	Local Emergency Planning Commission	505-334-1180 (Aztec, N.M.)
CHEMTREC	EMERGENCY	800-424-9300
CANUTEC	EMERGENCY	613-996-6666

* supplement attachment next page

The RA Group is responsible for providing follow-up written notifications to the LEPC. In addition, the RA Group shall be responsible for making written notification of releases involving Reportable Quantities (RQ) of hazardous substances or oils to the appropriate State and Federal Regulatory Agencies. For spills in excess of the hazardous substance RQ, the RA Group shall submit a written report to the EPA Administrator and/or State Agency containing the following:

(a) Name, address and number of the facility owner;
(b) Name, address and number of the facility;
(c) Date, time and type of incident;
(d) Name and quantity of substance released;
(e) Extent of any injuries;
(f) An assessment of the potential or realized hazards to human health or the environment; and
(g) An estimation of the quantity and disposition of recovered materials resulting from the incident.

For oil spills in excess of State or Federal guidelines; within the required deadline, RA Group shall submit a written report to the responsible Agency detailing:

(a) Name of facility owner;
(b) Name and location of facility;
(c) Date and year of initial facility operations;
(d) Description of facility including maps, topos, and flow diagrams;
(e) A copy of this plan;

BAKER PETROLITE

Bloomfield Facility, N.M.

100 Montana

EMERGENCY TELEPHONE NUMBERS

In the event of an emergency please contact one the following numbers:

Bloomfield Fire Department	911 Emergency
And Police Department	505-334-6622
LEPC Don Cooper	505-334-1180
National Response Center	800-424-8802
(Immediate Notification Required)	
NM Oil Conservation Division	505-334-6178 ext. 15
(Immediate Notification Required)	
CHEMTREC	800-424-9300
Regional Safety Coordinator	701-572-7764 off.
John Fisketjon	701-570-0823 cell
	701-572-4363 hm.
District Manager	435-789-3351 off.
Allan Mashburn	435-828-3351 cell
	435-789-4880 hm.
Area Manager	505-632-1000 office
Bryan Enns	505-330-3221 cell
	970-563-4253
Canutec	613-996-6666
[redacted]	505-632-1000 office
Jimmy Johnson	505-330-5685 cell.
	505-632-8979 home
Regional Manager	303-573-2272 off.
Steve Ralston	303-885-3867 cell
	303-688-5151 hm.
(TIS) Local Emergency Response	303-833-1111 off.
Gary or Chris Johnson	303-901-4909 cell
Denver, CO. 888-745-9197 pgr.	303-833-1119 fax
Hospital-San Juan Regional	505-599-6100

(f) Cause of the spill;
(g) Corrective actions taken including any repairs; and
(h) Preventive measures taken to minimize the potential for similar releases.

2.6 Evacuation Plan

The EC shall inform site employees if evacuation of the facility is warranted. An evacuation plan has been developed and is attached as Appendix H. Evacuation of the facility shall be performed in the following manner:

(1) Facility employees and contractors shall walk quickly and orderly to the MUSTER AREA where a head count shall be taken;

(2) Employees should remember to remain up- or cross-wind of the release area at all times, if possible.

(3) Upon completing a head count, the EC will attempt to determine the status of missing shift workers. Should rescue operations appear necessary, the EC shall inform local emergency response teams.

(4) All non-essential personnel will then move outside the facility and will not be given access to the site until the EC has given the "all clear".

(5) The EC shall recommend the evacuation of local residences and industries to the appropriate officials, where necessary.

A map plan depicting the acceptable routes from the operating portions of the site is presented in Figure 2-2. This map depicts emergency rally points and will be prominently posted at each access point at the facility. The following individual, Jimmy Johnson, will be responsible for performing the necessary employee and visitor head count during evacuation. Visitors must log-in at each BPC facility when entering the premises and must also be informed of evacuation procedures in case of an emergency.

Figure 2-2

2.7 Arrangements with Emergency Response Contractors

The facility has made agreements with the following firms to assist the company with any required remedial actions for releases:

Firm	Phone Number
Transportation & Industrial Services, Inc. Gary Johnson / Chris Johnson	303-833-1111
Local Emergency Planning Commission Don Cooper	505-334-1180

2.8 Agreements With Local Emergency Response Teams/
Coordination With Neighboring Industries

The facility may also call on the following local emergency response teams should their assistance be required:

Police: 911 / 505-334-6622 Bloomfield
Fire Department: 911 505-334-6622 Bloomfield

Hospital: 505-325-5011 San Juan Regional Medical Center

Emergency Medical Services: 505-325-5011 San Juan Regional Medical Center

Records of response agreements made with the above teams are retained at the site and available for review.

The following industries are lo ated within 1 mile of the facility:

Industry	Address	Number
Basin Disposal	#6 CR 5046 Bloomfield	505-632-8936
B & H Construction	290 N. 1st St Bloomfield	505-634-0460
Dial Oil	330 N. 1st St Bloomfield	505-634-4777
Foutz & Bursum Construction	3201 N. 1st St Bloomfield	505-634-4000

Under the following conditions he EC shall inform these industries of an environmental incident:

(1) a hazardous substan e release occurs into a nearby water course;
(2) a release or fire occ rs, which due to its extent, may interfere with neighboring industry operations; and
(3) a release occurs, wh ch due to the toxicity or hazard involved, may endanger neighboring industry employe s.

2.9 Clean-Up Procedures

Techniques used to clean-up an contain spills shall conform with the Environmental Programs Manual and training received. he equipment present on site to address these type of releases are listed in Table 2-3. The primar purposes of any action taken when responding to a spill are:

(1) Restrict the spill to t e smallest possible area. Block off or close all area drains;
(2) Avoid contaminating facility drains and ditches; and
(3) Use sandbags, adsor ents and fill dirt to construct temporary containment structures where necessary.

2.9.1 Petroleum Spills

(1) Restrict spill to containment area if possible by stopping or diverting flow to the tank.

(2) Small spills an leaks should be remediated as soon as feasible. Use adsorbent pads wherever possi le to reduce the amount of contaminated articles.

(3) If the release e: ceeds the containment system capacity, immediately construct additional cont inment using sandbags or fill material. Never allow the oil to seep into soils or dr: ins.

(4) After all recov rable oil has been collected and drummed, place contaminated soils and articles in ontainers.

(5) If a release occurs into a facility drain or nearby stream, immediately pump any floating layer into drums. For high velocity streams, place oil booms or hay bales between the release area and the plant boundary. As soon as possible, excavate contaminated soils and sediments.

(6) For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.

(7) Dispose of oily soils and contaminated articles in accordance with applicable State regulations.

(8) Decontaminate all equipment before storing.

(9) Document and report activities to RA Sugarland, as soon as feasible.

2.9.2 Hazardous Substance Releases

(1) Identify the material and quantity released.

(2) Block off drains and containment areas to limit the extent of the spill. Water should never be used to disperse a spill unless absolutely necessary.

(3) Ensure that Personnel Protection Equipment and containers are compatible with the material released.

(4) Collect and reclaim, if possible, as much of the spill using a hand pump or similar device. Containerize contaminated soils. Never place incompatible materials in the same drum.

(5) Take a sample of the substance for analysis and waste profiling. Contact the Sugarland Office for scheduling analytical work.

(6) Place a hazardous waste label with appropriate waste code on the drums containing contaminated materials. Move drums to the Hazardous Waste Storage Area.

(7) Decontaminate all equipment in a contained area. Collect and containerize decontamination fluids.

(8) Document and report activities to RA Sugarland.

In addition to these activities, surface water outfalls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations which appear affected by the release shall be impeded:

(1) with sand bags, adsorbent pads, or hay bales as necessary to prohibit the migration of contaminants off site or

(2) with temporary earthen berms to impede large quantities of affected water.

2.9.3 Fires/Explosions

Should a fire occur, the employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher of which the employee has been trained or (2) the responder has completed the BPC Fire Training Course.

2.9.4 Immediate Release Response Procedures for Acrolein

Immediate response actions for an acrolein release are:

1) Persons not wearing personnel protective equipment must evacuate from the release area.

2) Evacuate personnel to an upwind area and determine medical treatment needs.

3) Don appropriate personal protective equipment including SCBA. (Refer to MSDS)

4) Remove all ignition sources.

5) Ventilate release area.

6) Make all necessary notifications per section 10 of this document and activate emergency action plan.

7) For small quantity release (less than 1 pound):

Absorb with paper towel, dry sand, or absorbent; remove any contaminated gravel or soils; containerize and seal in secure drum; ventilate release area.

8) For large quantity release:

Vapor Suppression

Blanket spill area with alcohol foam at 6% to reduce vapor concentration. Reapply as needed due to the possible rapid breakdown of the foam blanket.

Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentration.

Neutralization Methods

a) Cover release with sodium carbonate (Soda Ash) and mix into spill with water. The soda ash and acrolein should form a solid byproduct after addition of water.

Ratio of 20 pounds soda ash to 1 gallon of acrolein
Followed by 2 gallons of water to each gallon of acrolein

Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

b) Alternatively, a 10% solution of sodium bisulfite may be added resulting in the deactivation of the acrolein. Once stabilized, collect and store in lined overpack drums along with any contaminated gravel or soils.

CAUTION: Apply sodium bisulfite only in its liquid form. Acrolein will undergo a *rapid exothermic chemical reaction* when it comes in contact with sodium bisulfite.

2.9.5 Immediate Fire Response Procedures for Acrolein

Immediate response actions for an acrolein fire are:

1) Evacuate personnel to an upwind area and determine medical treatment needs.

2) Don appropriate personal protective equipment including SCBA.(Refer to MSDS)

3) Cool exposed container sides with water from a safe distance.

4) Let acrolein spills burn if it does not endanger personnel or property. Keep exposed acrolein containers cool.

5) Only extinguish burning acrolein if flow (release) can be stopped or safely contained. Keep exposed acrolein containers cool. Apply alcohol foam at 6% to blanket spill area to extinguish fire.

   Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

6) Water may be used to dilute acrolein pools to non-flammable concentrations.

   Note: Run off must not enter waterways and should be contained. Acrolein is toxic to fish at low concentrations.

7) Make all necessary notifications per section 2.5 of this document.

2.9.6 Containment Action for Acrolein

The following activities are presented for the handling of an acrolein release. A release will present two immediate hazards:

1) Toxicity
2) Flammability

The toxicity hazards of acrolein were previously addressed. Flammability hazards of acrolein result from the low flash point, wide flammability range, and relatively high vapor pressure at 68 degrees F.

In the event of spills, liquid acrolein should be contained within a diked area. This diked area should be pumped or drained into drums for transportation for neutralization and disposal. Residual acrolein will be neutralized with a sodium carbonate and water or sodium bisulfite solution.

The following are minimum steps mandatory when dealing with a major acrolein spill:

- Use full body chemical protective suit and boots
- Use 4-H or butyl rubber gloves
- Use full facepiece SCBA in pressure demand mode
- Evacuate the area and approach site from upwind side
- Keep acrolein containers cool
- Blanket spill area with 6% alcohol foam to reduce vapors
- Neutralize liquid acrolein with sodium carbonate and water or sodium bisulfite solution.

2.9.7 Recovery Actions for Acrolein

The premise for dealing with all releases of acrolein will be early containment and neutralization with sodium carbonate and water or sodium bisulfite solution. In this manner, recovery will proceed immediately following neutralization.

Recovery methods will depend upon the quantity of the release. The dike around the containers should be of sufficient volume to contain the contents and neutralization will occur directly in the diked area. For small releases, acrolein may be recovered with hand towels or absorbents. All contaminated materials will be neutralized with sodium carbonate and water or sodium bisulfite solution, and disposed of in accordance with all federal state and local requirements.

Major releases will require more sophisticated recovery techniques done by only qualified persons. The acrolein will be drained or pumped into drums for neutralization, transportation and disposal. Residual acrolein will be neutralized in the diked area with sodium carbonate and water or sodium bisulfite solution. Vapors will be vented to the atmosphere. No attempts will be made to recover vapors. All recovery operations will be conducted by trained, qualified personnel familiar with acrolein.

2.9.7.1 Water

In the event of an acrolein spill into water, there are few to no containment alternatives. Acrolein is water soluble, and toxic to both aquatic flora and fauna. Toxicity decreases with aqueous dilution. Acrolein degrades rapidly in water. At a minimum, a risk assessment should be conducted immediately following the spill to determine the extent of the environmental impacts.

2.9.8 Disposal Techniques for Acrolein

Spills of acrolein will require special disposal methods in accordance with local regulatory requirements. Acrolein waste will require manifesting and transport to a permitted hazardous waste disposal facility for final disposal.

Waste Acrolein, Inhibited
Waste Code - P001

Released acrolein will be secured in lined overpacked drums, sealed, and manifested in accordance with all local regulations. These drums will be placed in a designated area to await shipment to a permitted hazardous waste disposal facility. Field manifesting will be required to move the material from the facility to the designated storage area as shown in the manifest form. The waste must be disposed of within the designated regulatory time frame.

Neutralized acrolein will require proper collection and disposal. Although an "inert solid" is formed with sodium carbonate, the entire release area will require cleanup and removal of contaminated materials. The contaminated materials will be placed in lined overpacked drums, manifested, and transported to a permitted hazardous waste disposal site for incineration.

All absorbent equipment, disposable PPE, neutralized acrolein and any contaminated material will be packaged in lined overpacked steel drums and labeled with the appropriate DOT shipping notifications.

2.9.9 Acrolein Shipping Guidelines

1. Shipping Description

   Acrolein, inhibited, 6.1 (3), UN1092, PGI

2. Required Package Marks

   INHALATION HAZARD

3. Required Package Labels

   TOXIC INHALATION HAZARD (primary hazard)
   FLAMMABLE (subsidiary)

4. Required Placard

   TOXIC INHALATION HAZARD

5. Approved Packaging

   Non-Bulk

   Specification cylinders except 8, 8AL, and 39
   1A1, 1B1, 1H1, 1N1, or 6HA1 drums further packed in 1A2 or 1H2 drums

   Bulk

   Rail

   Class DOT 105,109,112,114, or 120 fusion-welded tank car tanks
   Class 106 or 110 multi-unit tank car tanks

   Cargo Tank

   Specification MC 312, MC 330, MC 331, MC 412 Cargo Tank Motor Vehicles

   Portable Tank

   DOT Specification 51 portable tank (no bottom outlet)

3.0 PLAN AVAILABILITY

One copy of this plan shall be r tained at the facility and presented for review to each regulatory agency upon request. In additio , one completed copy shall be maintained by the BPC RA Group in Sugarland. This plan shall also be submitted to any LEPC upon request.

Finally, if it is determined that a sistance may be required in the event of an emergency at the site from local police departments, h spitals, and state and local emergency response teams, a copy of the plan will be submitted to that or ganization by the facility after conferring with the RA in Sugarland. In addition, BPC invites these t ams to visit the facility to familiarize themselves with the site emergency response procedures and equipment.

4.0 PLAN IMPLEMENTATION

This plan shall be implemented pon any release of hazardous waste, hazardous substance, or petroleum products in quantities exceeding those listed in Table 2-4 and Appendix G. Depending upon the type and quantity of m terial released, the extent of remedial response will vary.

5.0 PLAN AMENDMENTS AND REVIEW

Amendments to the plan may be initiated by either BPC or the EPA Regional Administrator (or authorized State Agency). This plan shall be reviewed and revised on an annual basis, or as needed, by the Site Manager or designated representative. Changes may be made to the plan by removing inaccuracies and writing in the revised and corrected information. Every three years, this document shall be submitted to the Sugarland RA Group for corrections and re-issuance. In addition the plan will be revised:

(1) Whenever a change has occurred in facility design due to construction, operations or maintenance that materially affects the potential for an oil spill or increases the potential for fire, explosion or release of hazardous substances, or modifies the response necessary during an emergency.

(2) When required by the EPA after review or when applicable regulations change.

(3) The list of emergency coordinators or emergency equipment changes.

(4) The Plan fails during an emergency.

BPC will submit the Plan to the EPA Regional Administrator whenever one of the following occurs:

(1) Discharges of more than 1,000 gallons of oil into navigable waters in a single spill event;

(2) Discharge of oil in harmful quantities as defined by 40 CFR § 110 into navigable waters during two reportable spill events in a twelve-month period. A harmful quantity is defined as: (1) an oil spill which causes a film or sheen upon or discoloration of the surface of the water or adjoining shore lines or causes a sludge or emulsion to be

deposited beneath the surface of the water or upon adjoining shore lines, or (2) violates applicable water quality standards; or

(3) When requested to do so by the US EPA.

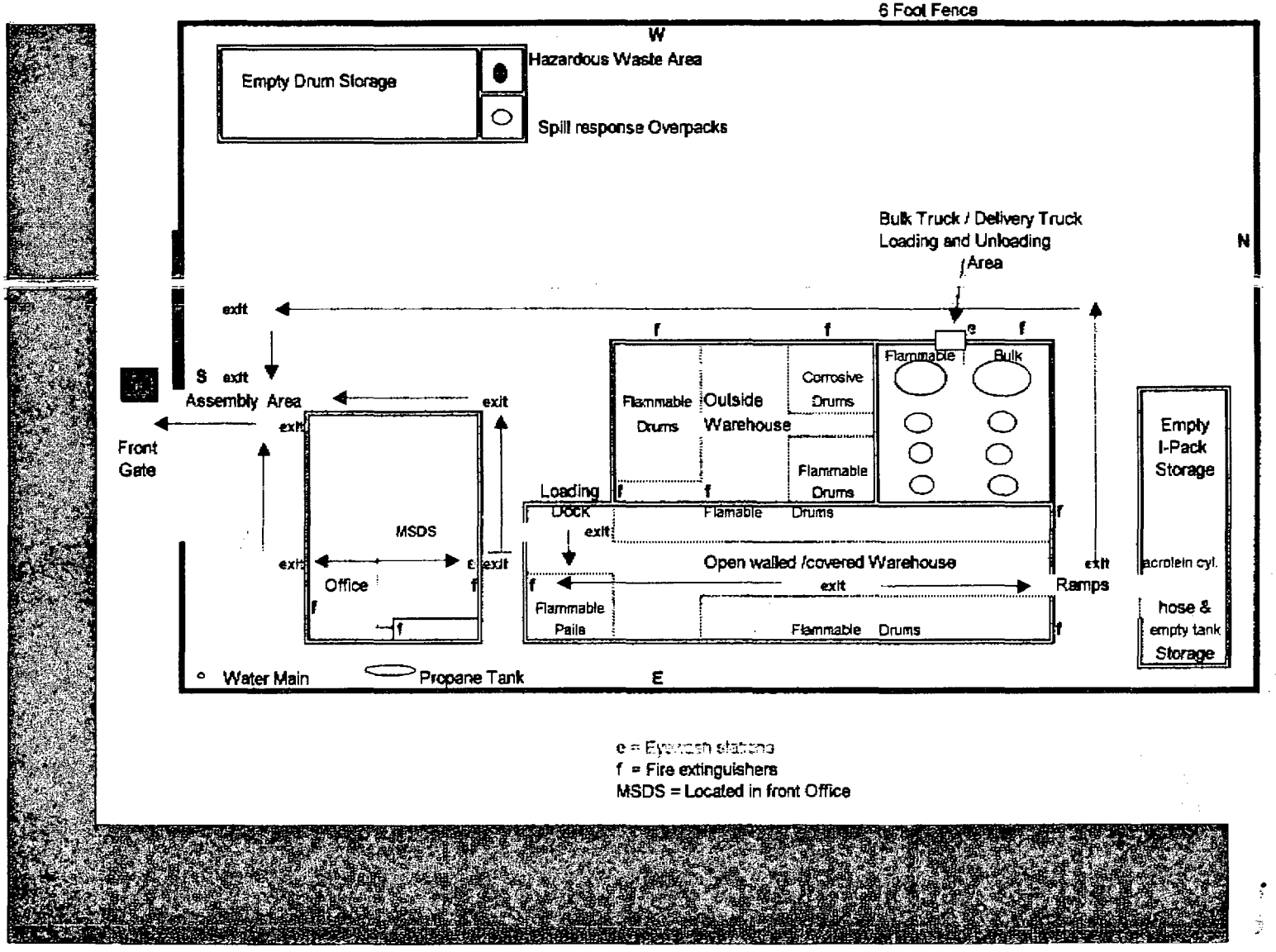
Any information made available to the EPA will also be sent to the Water Pollution Control Division of the appropriate State Agency.

APPENDIX A.
FACILITY PLOT

*** see attachment next page**

exit

Bloomfield, N. M. Warehouse, Emergency Equipment, Site Layout and Exits



APPENDIX B.
STORAGE FACILITY MAINTENANCE RECORDS

*** See warehouse facility records file**

APPENDIX C.
STORAGE AREA INSPECTION FORMS

* See warehouse facility records file

APPENDIX D.
POLLUTION INCIDENT LOG

*** see spill response files**

APPENDIX E.
EMPLOYEE TRAINING RECORDS

*** see training files**

APPENDIX F.
JOB TITLES AND DESCRIPTIONS

*** see safety files**

APPENDIX G.
REPORTABLE QUANTITIES

*** refer to table 2-4**

APPENDIX H.
EVACUATION PLAN

* see appendix A facility plot attachment

APPENDIX J – Depth to Groundwater Information

State of New Mexico Hydrologic Report 365. Depth to groundwater is approximately 180 feet with 2000-4000 mg/L of TDS. This information was obtained from previous renewal applications.

APPENDIX K – Facility Closure Plan

Baker Petrolite Corporation's (BPC) Bloomfield, NM facility consists of developed commercial real estate. The building and land are solely owned by BPC. Should BPC cease conducting business at this site, all chemicals, wastes, and other materials regulated by the OCD, OSHA, and the EPA will be removed form the site and disposed of according to regulation. The office, warehouses, and other permanent structures will be sold as part of the site improvements.

The Bloomfield, NM facility does not have any other water contaminant discharges to either the ground or below the surface of the ground. OCD guidelines will be followed in reporting and cleaning up any ground contamination in the event of a reportable accidental release from chemical handling and transportation activities during the operational life of the facility. OCD cleanup guidelines address soil and groundwater remediation from such occurrences. Further post-closure maintenance plans, monitoring plans, and financial assurance are not deemed necessary.

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-135
BAKER PETROLITE CORPORATION
BLOOMFIELD SERVICE FACILITY
DISCHARGE PERMIT APPROVAL CONDITIONS
(June 2, 2003)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil field service companies equal to $1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Baker Petrolite Corporation Commitments: Baker Petrolite Corporation will abide by all commitments submitted in the discharge permit renewal application dated December 18, 2002 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. 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.

11. Class V Wells: No 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. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a Baker Petrolite Corporation's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

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

14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Permit: Baker Petrolite Corporation, Inc. shall maintain storm water runoff controls. As a result of Baker Petrolite Corporation, Inc.'s operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Baker Petrolite Corporation, Inc. shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Baker Petrolite Corporation shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Bloomfield Service Facility are discontinued for a period in excess of six months. Prior to closure of the Bloomfield Service Facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: Baker Petrolite Corporation, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Baker Petrolite Corporation further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

BAKER PETROLITE CORPORATION.

by Allan Mayhew

Title District Manager

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8-5-03,

or cash received on _____ in the amount of $ 1700 —

from BAKER PETROLITE

for Bloomfield Service Facility GW-135

(Facility Name) (OCD No.)

Submitted by: _____ Date: 8-15-03

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal ✓

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

BAKER HUGHES

JP MORGAN CHASE BANK

32-115
1110

Check No. [redacted]

Date 08/05/2003

BAKER HUGHES BUSINESS SUPPORT SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
Houston TX 77267-4427
(281) 209-7500

CHECK AMOUNT

$*********1,700.00*

PAY *** ONE THOUSAND SEVEN HUNDRED USD***

TO THE ORDER OF

USD

NEW MEXICO OIL CONSERVATION DIVIS
1220 NORTH ST FRANCIS DRIVE
SANTA FE NM 87505

[redacted]

BAKER HUGHES BUSINESS SUPPORT SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
HOUSTON,TX 77267-4427
(281)209-7500

Check Information

Check No. / Date
[redacted] 08/05/2003
Your account with us
166889

Document	Your document	Date	Gross amount	Deductions	Net amount
Payment is made on behalf of Baker Petrolite Corp., .					
1900238622	062703	06/27/2003	1,700.00	0.00	1,700.00
Sum total			1,700.00	0.00	1,700.00

Bloomfield NM (No 2 co Rd 5046) - water
procen-permit - final

ATTACHMENT TO THE DISCHARGE PLAN GW-135
BAKER PETROLITE
BLOOMFIELD FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(May 28, 1998)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been submitted. The $690.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. Baker Petrolite Commitments: Baker Petrolite will abide by all commitments submitted in the discharge plan application approved March 15, 1993, the modification letter from Petrolite Corporation dated August 20, 1996, and this approval letter with conditions of approval from OCD dated May 28, 1998.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. 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. Permittees 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.

11. 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.

12. 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.

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

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Closure: The OCD will be notified when operations of the Bloomfield Facility are discontinued for a period in excess of six months. Prior to closure of the Bloomfield Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. Certification: Baker Petrolite, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Baker Petrolite further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

BAKER PETROLITE

by _____ Manager Environmental
Title

ATTACHMENT TO DISCHARGE PLAN GW-135
Petrolite Corporation - Bloomfield Facility
DISCHARGE PLAN REQUIREMENTS
(October 8, 1996)

1. **Payment of Discharge Plan Fees**: The $690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. **Petrolite Corporation Commitments:** Petrolite Corporation will abide by all commitments submitted by Petrolite Corporation as part of the approval from OCD dated March 15, 1993, the modification letter from Petrolite Corporation dated August 20, 1996, and this approval letter with conditions of approval from OCD dated October 8, 1996.

3. **Drum Storage**: All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

4. **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.

5. **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 facilities or modifications to existing facilities must place the tank on an impermeable type pad.

6. **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.

7. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. **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 that do not have secondary containment and leak detection 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 /or sumps.

9. **Underground Process/Wastewater Lines**: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

10. **Housekeeping**: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

12. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

13. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

14. **Certification:** Petrolite Corporation, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Petrolite Corporation., further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect groundwater, human health and the environment.

Accepted:
Petrolite Corporation

by R L Churchill

Title VP/GM Petrolite Div.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

March 15, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-952

Mr. Edwin E. Schooling
VP, Manufacturing & Distribution
Petrolite Corporation
369 Marshall Avenue
St. Louis, Missouri 63119-1897

RE: Discharge Plan GW-135 Approval
Petrolite Farmington Service Facility
San Juan County, New Mexico

Dear Mr. Schooling:

The **discharge plan GW-135** for the Petrolite Farmington Service Facility located in Section 3, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated January 8, 1993.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations (WQCC). It is approved renewed pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan.

Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan approval is for a period of five (5) years. This approval will expire March 15, 1998, and you should submit an application for renewal in ample time before this date.

The discharge plan application for the Petrolite Farmington Service Facility is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat fee of thirteen hundred and eighty (1380) dollars for service companies.

The OCD has received your check for fourteen hundred (1400) dollars. The total amount due for the approved discharge plan is the total of the $50 filing fee plus the $1380 flat fee or fourteen hundred and thirty (1430) dollars. The remainder of the fee that Petrolite owes is thirty (30) dollars.

Please make all checks out to: **NMED - Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/kmb
Attachment

xc: Denny Foust, OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-135 APPROVAL
PETROLITE FARMINGTON SERVICE FACILITY
DISCHARGE PLAN REQUIREMENTS
(March 15, 1993)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Construction: Any new sumps or below-grade tanks will be approved be the OCD prior to installation and will incorporate secondary containment and leak detection in their designs.

3. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain one and one-third times the capacity of the tank.

4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

5. Modifications: All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.