

GW - 190

**GENERAL
CORRESPONDENCE**

YEAR(S):

1996 - 1995

APPLICATIONS
3 OF 4

SECTION VII & VIII

CURRENT WASTE STREAM AND TREATMENT PROCEDURE

VII - WASTE STREAMS
VIII - PROCEDURES

1. Truck wash

The truck wash wastewater generated at the truck wash bay as a result of washing the truck exterior is made of three components; water, inert solids and oil. When the water is separated, approximately 5,000 gallons per month, is discharged to the septic system.

The sand and dirt commingled in a sludge is collected at the sump of the truck wash bay. Approximately 2 cubic yards per month is picked up by Hughes Services/Steve Carter, P O Box 68, Loco Hills NM 88255, Permit No. R-6811A, (505/397-9315) for disposal.

The oil, approximately 20 gallons per month, collected at the oil/water separator is stored in a 300 gallon fiberglass reinforced plastic underground storage tank; PVC piping, until it is picked up by Hughes Services/Steve Carter, P O Box 68, Loco Hills NM 88255, Permit No. R-6811A, (505/397-9315), for recycling.

2. Cement

Approximately 45,000 pounds per month of excess off-spec cement from well servicing activity is collected and stored in an upright silo until it is picked up by various people for personal use.

3. Empty drums

Empty drums, approximately 2,000 per year, generated from Western chemicals are stored on the cement pad next to the acid dock until they are picked up by West Texas Drum, 11107 County Rd. 127 W, Odessa TX 79765, TXD 000 095 232, (915/563-5751) for recycling or disposal.

4. Domestic trash

Domestic trash generated by normal operations from the office and site buildings is placed in large receptacles that are picked by the trash trucks; the contents are dumped into the trucks and taken for disposal by the City of Artesia Waste Management, Artesia NM 88240 (800/634-8760) in the city landfill.

5. Domestic sanitary wastewater

This wastewater generated from sinks, showers and restrooms is piped through the pretreatment tanks, located north of the Maintenance Shop and east of the washbay, into the septic system.

6. Field wastewater

The wastewater generated as a result of draining the manifolds of pump trucks, blenders and transport trucks is run through an oil/water separator and stored in a 10,000 gallon fiberglass aboveground storage tanks; epoxy resins lined; PVC piping. Approximately 50 barrels per month is picked up by Hughes Services/Steve Carter, P O Box 68, Loco Hills NM 88255, Permit No. R-6811A, (505/397-9315) and disposed in the Loco Hills Water Disposal, SW corner 4, Sec. 16, Township 17S, Range 30E (505/677-2118), Permit No. 3221.

7. Acidic wastewater

Overfill from truck loading and minor chemical spillage from truck tanks is collected in the same 10,000 gallon fiberglass reinforced plastic aboveground storage tank indicated in No. 6; epoxy resins lined; PVC piping, and treated by elementary neutralization at the truck loading facility. After the pH is checked and verified to be between 6 and 8 this waste, approximately 2,000 gallons per month, is picked up by Hughes Services/Steve Carter, P O Box 68, Loco Hills NM 88255, Permit R-6811A, (505/397-9315) for disposal at Loco Hills Water Disposal, SW Corner 4, Sec. 16, Township 17S, Range 30E, (505/677-2118), Permit No. 3221.

8. Used motor oil

Used motor oil from truck oil changes generated in the Maintenance Shop is stored in a 500 gallon underground tank until it is picked up by E & E Enterprises, P O Box 683, Brownfield TX 79316, TNRCC No. 43198, EPA No. TXD 982 756 868, (806/637-9336), for recycling.

9. Spent solvent

Spent shop solvent used for truck maintenance and parts cleaning is stored in Safety Kleen units located in the Maintenance Shop. Safety Kleen, 10607 WCR 127, Midland TX 79711, TNRCC No. 72078, EPA No. TXD 981 056 690, (915/563-2305), handles the delivery and recycle activities of the 50 gallons of spent solvent on a monthly routine.

10. Used tires

Worn tires replaced from the trucks are stored in the tire rack until picked up for recycling by Jack Hamilton, 401 W Main, Brownfield TX 79316, (806/637-3547). Approximately 120 tires are recycled yearly.

11. Used batteries

Used batteries are stored in a non-flammable cabinet until traded in for new batteries. Interstate Battery, 2400 W County Road, Hobbs NM 77249, (505/397-9315) picks up about 120 batteries per year for recycling. Interstate Battery sends these batteries to Midland Odessa Metals, 1605 Garden City Highway, Midland TX 79701 (915/570-4006), TNRCC No. 20082, for metal recovery.

12. Used filters

Used filters generated from oil changes and truck maintenance are drained and drummed for pickup and recycling. E & E Enterprises, P O Box 683, Brownfield TX 79316, TNRCC No. 43198, EPA No. TXD 982 756 868, (806/637-9336), picks up approximately 24 drums each year.

13. Used antifreeze

Antifreeze generated during truck maintenance is stored in drums in the Maintenance Shop and is restrengthened and reused. No used antifreeze is disposed.

14. Scrap metal

Scrap metal generated from miscellaneous truck repair and well maintenance/servicing is collected in a scrap metal bin. Approximately 2,000 pounds per year is picked up by Artesia Metal and Supply, 2001 E Main, Artesia NM 88210, (505/746-2412), for recycling.

15. Slurry polymer waste

Approximately 4,000 gallons per year, generated by overfill from truck loading or excess that is not reusable, of slurry polymer waste is picked up by Hughes Services/Steve Carter, P O Box 68, Loco Hills NM 88255, Permit No. R-3221, (505/397-9315), for recycling.

16. Truck maintenance area

The truck maintenance area floor drain collects waste into an oil/water separator and the waste oil is piped to the waste oil underground storage tank. About 50 gallons per month is picked up by E & E Enterprises, P O Box 683, Brownfield TX 79316, (806/637-9336), for recycling. The water is piped to the septic tank

SECTION IX
PROPOSED MODIFICATION

MEETING

On January 23, 1995, a meeting was held regarding The Western Company of North America-Artesia District's application for a Discharge Plan. At the meeting was Mark Ashley, Environmental Geologist for the State of New Mexico; Phillip Box, Manager, Real Estate & Environmental Compliance; Rex Glenn, Operations Supervisor No. 1; Daniel Ramsey, Maintenance Supervisor, and Angela Hardy, Environmental Coordinator, with Western. A letter dated January 26, 1995, was received from William J LeMay, Director of Energy, Minerals and Natural Resources Department of the State of New Mexico, requesting that Western prepare a Discharge Plan for Artesia within 120 days of receipt of his letter.

SECTION IXPROPOSED MODIFICATION

The following items require action to be taken at the Artesia District, and have been agreed upon by Mark Ashley of the State of New Mexico.

1. TRUCK MAINTENANCE BUILDING

- A. Sample oil from the sump collection tank. Make hazardous or non-hazardous determination. Insure proper disposal.

Time Frame: July, 1995

- B. Annually test this sump for leaks, using a hydrostatic test.

Time Frame: September, 1995; annually, thereafter

- C. Relocate packing oil and motor oil tanks from beside the maintenance shop to the old fuel island.

Time Frame: By December, 1996

- D. Remove any contaminated or oil soaked soils after the tanks have been relocated. The soils will be tested for BTEX, TPH and RIC. Disposal will be appropriate for the type of contaminate determined.

Time Frame: By December, 1996

2. FUEL ISLAND AREA

- A. Test old soil inside the concrete containment area using BTEX, TPH and RIC analysis. Dispose of soils accordingly.

Time Frame: By December, 1997

3. DRUM STORAGE AREA

- A. Place a curb around the drum storage area and finish pouring concrete to provide for storage of all drums on a concrete pad with containment.

Time Frame: By December, 1996

4. TRUCK LOADING DOCK

- A. Pour a concrete curb around the dock such that chemicals cannot run off or be spilled onto the ground.

Time Frame: By December, 1996

5. ACID DOCK AND DRIVE RAMP

- A. Replace and rebuild the acid drive.

Time Frame: By December, 1996

- B. Take appropriate action to clean any contaminated soils, if discovered. A 72-hour notice to the State will be required prior to any construction or excavation work being done.

Time Frame: By December, 1996

- C. Install an acid containment wall adequate to hold 1-1/3 times the volume of acid stored.

Time Frame: By December, 1996

6. OIL FIELD WASTE COLLECTION SYSTEM

- A. Have a closure plan prepared, based on State guidelines, to remove or close in-place three tanks.

Time Frame: By December, 1997

7. OLD BRINE STEEL TANKS

- A. Arrange for proper disposal of the residual crystalline salt and rusty metal.

Time Frame: By December, 1996

8. TRUCK WASH BAY - OIL AND WATER SEPARATOR

- A. Take samples of oil and make hazardous or non-hazardous determination.

Time Frame: By July, 1995

1

X

SECTION X
INSPECTION PLAN

INSPECTION PLAN

The Western Company of North America's (Western-Artesia) District is inspected monthly (to be performed during the calendar month) by the designated Environmental Coordinator on site using an inspection check list. The facility is also inspected yearly by the Environmental Supervisor sent from The Western-Houston Corporate Office (form included). Corrective action will be taken whenever deficiency is found. The actions taken are documented, dated and signed by the Environmental Coordinator on site.

Three of the four small underground storage tanks for oil storage have been registered with the state and are currently up to date on the registration requirements. The fourth, a 300 gallon used oil tank, was dropped from the registration list by the State of New Mexico.

THE WESTERN COMPANY OF NORTH AMERICA
Site Facility Environmental Inspection Report

Location Inspected	Date of Inspection	Inspected By	Dist Mgr Approval		
TOTAL SITE			Yes	No	Action
1. Does the site look clean?	W				
2. Are spills visible or unusual vapors detectable?	D				
3. Are there signs of surface run-on or run-off?	D				
4. Are the drainage ditches clean with no oil sheen on the standing water?	D				
FUEL ISLAND			Yes	No	Action
5. Is the fuel island slab clean?	D				
6. Are there signs of spills?	D				
7. Are all warning signs in place?	D				
8. Have tank levels been monitored and recorded?	D				
9. Are tank valves in working order?	D				
10. Do tanks show signs of leaks?	D				
MAINTENANCE SHOP/WASH RACK			Yes	No	Action
11. Is oily trash stored in clearly marked containers? ("OILY TRASH")	D				
12. Are shop drains and grease traps free and clear and operating?	D				
13. Are there any signs of spills?	D				
14. Are used oil containers clearly labeled? ("USED MOTOR OIL")	W				
Are waste oil containers clearly labeled? ("WASTE (RECOVERED) OIL")	W				
15. Are all containers leak free and sound?	D				
16. Are all containers stored closed and upright?	D				
17. Are accumulation dates noted on waste containers?	M				
18. Are liquid levels approaching container capacity?	W				
19. Is tool wash and Safety Kleen equipment leak free and clean?	W				
20. Is all used antifreeze being stored in clearly labeled containers? ("USED ANTIFREEZE")	W				
DRUM STORAGE			Yes	No	Action
21. Are all containers rust free and sound?	W				
22. Are all empty drums stored closed, horizontal on pallets or in a contained area?	W				
23. Are all contents removed from empty drums?	W				
24. Is there any sign of spills?	D				
OIL/WATER/SOLIDS SEPARATORS			Yes	No	Action
25. Are inlet/outlet pipes clear?	D				
26. Are pumps operating smoothly?	D				
27. Are solids pipes clear?	D				
28. Are there signs of spills or overflow?	D				
29. Is discharge to POTW or drainage field monitored?	W				
WASTE OIL TANKS			Yes	No	Action
30. Have tank levels been monitored and recorded?	D				
31. Are liquid levels near tank capacity?	D				
32. Do tanks show signs of leaks?	D				
33. Are tank valves in working order?	W				

ACID DOCKS/TANKS		Yes	No	Action
34. Is acid dock area and adjacent areas clean of spills?	W			
35. Are dock drains clear and operating?	W			
36. Are warning signs in place?	D			
37. Are tank lines, valves, and connections in working order?	W			
38. Is vent system working properly?	W			
39. Are liquid levels in product and waste tanks monitored and recorded?	W			
40. Is pH of waste tank checked and recorded?	W			
41. Do tanks or containment show signs of corrosion or leakage?	W			
CHEMICAL STORAGE/BULK PLANT		Yes	No	Action
42. Are containers in good condition, properly labeled and stored upright?	W			
43. Are there signs of spills?	D			
44. Is the bulk plant floor clean?	W			
45. Is waste cement tank approaching capacity?	W			
FIELD WASTE DUMP STATION/TANK		Yes	No	Action
46. Are there signs of spills on adjacent soils or asphalt?	D			
47. Are tank levels monitored and recorded?	D			
48. Are liquid levels above 80% capacity?	D			
49. Are tank valves working properly?	D			
50. Does tank show signs of corrosion or leaks?	D			
SPC AREA		Yes	No	Action
51. Is the area clean and free of stains?	D			
52. Are all spills cleaned?	D			

GENERAL		Yes	No	Action
53. Have all surface impoundments been removed?				
54. Has follow-up action been taken as noted on previous inspection forms?				
RECORDS		Yes	No	Action
55. Is the Environmental Files system in good order? (See List of Files at location).				
56. Have the disposal records been filed?				
57. Have the daily tank gauging records been filed?				
58. Have the environmental inspection records been filed?				
59. Have permits and registrations been filed?				

W=weekly D=daily M=monthly

Remarks/Action: _____

5

IX

SECTION XI

CONTINGENCY PLAN/EMERGENCY RESPONSE PLAN

CONTINGENCY/EMERGENCY RESPONSE PLAN

This Emergency Response Plan is necessary for the District and its personnel to minimize personal injury, property damage and business interruptions caused by any catastrophe; such as, fire, flood, storm, tornado, etc.

In the event of an emergency, all employees will proceed to The Western Company's sign on the front lawn in a safe and orderly fashion. At this time a head count will be taken by the Team Coordinators to determine if any employee is missing. The Dispatcher will notify all Team Leaders of employees that may be on jobs or days off. Two Team Coordinators and two Team Leaders will make a sweep of the facility by means of the Buddy System to locate any missing persons or vendors that may be on the yard.

1. Chemical Spill/Release Reporting and Containment

EmTech Environmental Services, Inc. - 1-800/336-0909

This is a 24 hour emergency response service for spills/releases that is contracted to assist Western with any emergencies. Every District has been provided with this information to assist them in handling emergencies. This company has been provided a site plan, MSDSs for chemicals handled at each District and the contact people at each District.

Emergency Telephone Numbers

- A. Emergency Number - 911
- B. Electrical Utility - 746-3571
- C. Gas Utility - 746-3545
- D. Water Utility - 746-2122
- E. Telephone - 800/954-1211
- F. Poison Control Center - 800/432-6866
- G. District Manager - 808/798-8680

Equipment for Containment

- A. Foutz & Bursom Co. - 325-3712
After hours:
Greg Swapp - 632-9569
Larry Sanders - 334-2348
Steve Foutz - 334-2656

II. Action Team Members

- A. Action Team make-up and duties - All operations concerning evacuation, rescue, spill containment, fire fighting procedures, securing utilities, medical (First Aid), public relations, clean-up and all clear to re-enter areas, will be handled by the district action team. This team will be made up of the district manager, operations supervisors, assistant operations supervisors and maintenance supervisor.

Names of team members:

John Bendure, District Manager
806/798-8680

Rex Glenn, Operations Supervisor
505/622-5126

Daniel Ramsey, Maintenance Supervisor
505/365-5922

Joe Greenwood, Facilities Supervisor
505/746-2059

Mike Hill, District Engineer
505/746-3215

John Bendure, Environmental Coordinator
808/798-8680

Team Coordinators

John Bendure

Rex Glenn

Joe Greenwood

Team Leaders

Daniel Ramsey

Gene Yates

Jim Hardiman

Terry Doshier

Mike Hill

TEAMS

ALL DISTRICT EMPLOYEES

Teams will be set up to handle any type situation that may require removal of equipment or a spill on the facility. At **NO** time will a team or teams be ordered into an area that is unsafe.

The "All Clear" signal to re-enter areas will come from Western management. The Team members will assign their standbys in the event of absence.

- B. In the event the Emergency Preparedness Plan is implemented, the Dispatch Office will serve as a command center. If this is unsafe, the secondary command post will be The Western Company sign on the front lawn.

III. Fire Fighting Procedures

- A. Hazardous Materials Handling - If a fire cannot be put out immediately with hand held portable fire extinguishers, the area will be evacuated and the Fire Department will be summoned by dialing 911. Material Safety Data Sheet books should be consulted and made available to the Fire Department in order to ascertain what, if any, hazards might be encountered in the fire. These books are kept in the following places:

1. Dispatch Office
2. District Lab
3. Training Office
4. Maintenance Supervisor's Office
5. Chemical Warehouse

- B. Fire Extinguisher Locations - Fire extinguishers in the main office are located at the entrance of the Dispatch Office; at the entrance of the lounge; outside the Conference Room; at the door near the storage room next to the sales office and just outside the District Manager's office.

- C. Securing Utilities - The master shutoff points are at the **SOUTHEAST CORNER** of the **MAINTENANCE BUILDING**. The **RED VALVE** is the gas, the **YELLOW ARROW** on the electric box points to the **main breaker** for all **ELECTRICAL POWER**. This will shutdown all gas and electricity on the facility.

In case of an uncontrolled **acid spill** or fire where the acid tank is involved, turning the **fluorescent orange** valve on the acid tank will stop all flow.

- D. Fire Fighting Water Available - The main water shut-off valve, a **red-handled valve**, is located at the **southeast corner** of the facility in a concrete lined pit with a metal cover.

IV. Evacuation of Personnel and Equipment

- A. Personnel - All personnel on the District facility will meet at The Western Company sign on the front lawn. From that point, all personnel will go to the nearest safe point near the District to receive information on rescue, recovery and control measures to be taken.
- B. Equipment - Only equipment that is to be used in control and containment will be removed from the facility. Also any equipment that could be in immediate danger that can be removed without risking any personal harm or injury to personnel in the area should be removed. Equipment used to contain hazardous material spills will be moved to a safe place on the facility until ready for use.

In the event any emergency makes it necessary to evacuate a specific work area or the entire premises, the following guidelines should be followed, in addition to those already set forth. As an area is evacuated and it is safe to do so:

Maintenance Shop Area and Wash Bay:

Turn off all operating equipment such as diesel, gasoline or electric motors and engines, welders-gas and electric, grinders, saws, parts washers, sprayers, compressors and anything that might be or become a hazard if left unattended.

Fuel Island:

Turn off all operating equipment such as diesel, gasoline or electric motors and engines, fuel and oil dispensers and anything that might be or become a hazard if left unattended.

Sand Plant and Test Tank Area:

Turn off all operating equipment such as diesel, gasoline or electric motors and engines, tank discharge valves and anything that might be or become a hazard if left unattended.

SPC, Chemical Warehouse, Acid, and Propane Docks:

Turn off all operating equipment such as diesel, gasoline, electric or propane motors and engines, tank discharge valves and anything else that might be or could become a hazard if left unattended.

Front Office, Lab, Training and Locker Room Areas:

Turn off anything that might be or could become a hazard if left unattended.

ALL AREAS

Evacuate using the safest and most direct route possible!

V. Security

All outside persons, except fire fighting personnel, will be kept off the facility until the "All Clear" has been given. The District Manager will assign all those in charge of this duty. All outsiders must be kept out of the dangerous areas. The possibility of explosion, fumes, radioactive materials, etc., may be present and complete measures must be taken to control its confinement.

VI. Radioactive Material Handling

In the event there is an emergency that involves a densitometer containing radioactive materials; the Radiation Safety Officer (John Bendure) and the Radiation Safety Supervisor (Mike Hill) will be immediately notified.

No one will be permitted into the area until the RSO and the RSS have determined that it is safe to do so.

VII. Public Relations

The district policy is to cooperate fully with members of the press and representatives of the public. District policy is to provide all possible factual information as quickly as possible within the normal limits of safety and security. The District Manager will designate the person or persons responsible for this activity.

VIII. Serious Injuries and Fatalities

A personal visit by the District Manager and any other personnel assigned is recommended when informing the family of the circumstances. This should be done as soon as possible and in a manner in line with Western philosophy and procedure.

IX. Medical

- A. In the event of a serious accident or injury, a person qualified in American Red Cross Standard First Aid is on duty during all hours of operation. Using the procedures set by the American Red Cross, first aid will be initiated and followed until the Emergency Medical Services arrive.
- B. In case of chemical poisoning, a call should be placed to the nearest poison control center available. Consult the Material Safety Data Sheets manual to find information on first aid measures to be taken until qualified help can be reached.

X. Spill Control and Containment

- A. Acid Tank Failure - First, clear the area of all personnel and give first aid to the injured. Establish security measures and keep all personnel clear of the area. An action team comprised of the District Manager, facilities manager and safety & training supervisor will select personnel to start clean-up and containment procedures. A forklift will be activated and utilized to move soda ash and lime to the lowest point in the facilities to dam up fluid flow and neutralize strong acid on the surface. Construction companies in the area will be contacted to bring in materials to strengthen the dam so as to contain all fluid within the facilities. Next will be the ordering of clean-up equipment, ie; front loader, dump trucks, fill material, vacuum trucks, etc. Western (District) transports will be positioned on the lowest part of the yard area. There the vacuum trucks will meet with the transports to begin pulling fluid off the ground and washing down with fresh water to force the strong fluid to the low point in the yard where all fluid on the ground will be pulled into the vacuum trucks and moved to a disposal well or area.

After all fluid has been removed from the ground, clean-up and repair operations will commence using all district personnel available. The action team will coordinate all operations.

- B. Hazardous Material Leakage - When there is a leak or suspected leakage at a hazardous materials storage facility, efforts must be made to stop the leakage as soon as possible without endangering personnel safety. Containment dikes will be built to contain the spillage; the spill picked up by absorbent material and placed inside containers or containment area before disposal by a qualified disposal company. The incident will be reported to the National Response Center, the local authority and Western's corporate environmental office.

