NM1 - ___30_____

DAF
Waste

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

February 28, 2008

Mr. Jim Wilson
Artesia Aeration, LLC
PO Box 310
Hobbs, New Mexico 88240

RE: February 7, 2008 – Complaint Investigation of Acceptance of Navajo Refinery Dissolved Air Flotation (DAF) Material
Artesia Aeration Landfarm: Permit NM-01-0030
Location: Section7, Township 17 South, Range 32 East, NMPM
Eddy County, New Mexico

Dear Mr. Wilson:

The New Mexico Oil Conservation Division (OCD) received a complaint against Artesia Aeration, LLC (Artesia Aeration) surface waste management facility operations in regard to the acceptance and disposal of DAF material generated by Navajo Refining Company, LP (Navajo) Navajo Refinery of Artesia. OCD's initial concerns were the RCRA classification and listing (K048) of the DAF material and the possible disposal of such waste material at a permitted surface waste management facility restricted to the operation of landfarming. OCD initiated an investigation into the complaint during a pre-planned February 7, 2008 site visit to Artesia Aeration. The investigation included the inspection and review of documents provided by Navajo.

During the February 7, 2008 site visit, Mr. Brad Jones, an OCD representative, observed the DAF material placed in a landfarm cell dedicated for waste from Navajo. At the time, Mr. Jones recommended that the DAF material be isolated and berm be placed around the material until further instructions were provided. Mr. Jones obtained copies of available delivery manifest from the landfarm office and traveled to Artesia Aeration's Hobbs office to inspect and obtain copies of any additional records regarding this matter. According to the available copies obtained during the February 7, 2008 visit and copies provided by Navajo, approximately 15 ten-cubic yards of DAF material were delivered to the Artesia Aeration landfarm – an approximate total of 150- cubic yards of DAF material. Artesia Aeration was unable to produce or provide Mr. Jones a signed C-138 form approving the acceptance of the DAF material.

The OCD wishes to take this opportunity to remind Artesia Aeration that the following regulatory requirements apply to the landfarm operations and the permit:

In accordance with Paragraph (3) of Subsection A of Section 7 of 19.15.36 NMAC, a landfarm is defined as

"a discrete area of land designated and used for the remediation of petroleum hydrocarbon-contaminated soils and drill cuttings."

Pursuit to Subsection A of Section 20 of 19.15.36 NMAC, the transitional provisions of the new surface waste management facility regulations,

"existing surface waste management facilities *shall comply with the operational, waste acceptance and closure requirements provided in 19.15.36 NMAC*, except as otherwise specifically provided in the applicable permit or order, or in a specific waiver, exception or agreement that the division has granted in writing to the particular surface waste management facility."

Pursuit to Subsection F of Section 13 of 19.15.36 NMAC, operational requirements applicable to all permitted surface waste management facilities,

"Surface waste management facilities shall accept only exempt or non-hazardous waste, except as provided in Paragraph (3) of Subsection F of 19.15.36.13 NMAC. *The operator shall not accept hazardous waste at a surface waste management facility*. The operator shall not accept wastes containing regulated naturally occurring radioactive material (NORM) at a surface waste management facility except as provided in Subsection C of 19.15.9.714 NMAC. *The operator shall require the following documentation for accepting oil field wastes, and both the operator and the generator shall maintain and make the documentation available for division inspection.*

(1) Exempt oil field wastes. The operator shall require a certification on form C-138, signed by the generator or the generator's authorized agent, that represents and warrants that the oil field wastes are generated from oil and gas exploration and production operations, are exempt waste and are not mixed with non-exempt waste. The operator shall have the option to accept such certifications on a monthly, weekly or per load basis. The operator shall maintain and shall make the certificates available for the division's inspection.

(2) *Non-exempt, non-hazardous, oil field wastes. The operator shall require a form C-138, oil field waste document, signed by the generator or its authorized agent. This form shall be accompanied by acceptable documentation to determine that the oil field waste is non-hazardous.*"

In accordance with Subsection A of Section 15 of 19.15.36 NMAC, operational requirements for landfarms,

"The person tendering oil field waste for treatment at a landfarm *shall certify, on form C-138*, that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content, and that the samples have been found to conform to these requirements. The landfarm's operator shall not accept oil field waste for landfarm treatment unless accompanied by this certification."

In order to close this complaint, OCD requires the removal of the DAF and submittal of a DAF removal report within 15 days of receipt of this letter. The report shall include the protocols,

procedures and methods implemented and applied to adequately remove the DAF material from the landfarm facility and supporting documentation that demonstrates the proper disposal of the DAF material.

To ensure and prevent any future issues in regards to this matter, please submit an operational and waste acceptance plan to the OCD for review and approval within 15 days of receipt of this letter. The operational and waste acceptance plan shall propose protocols, procedures and methods that Artesia Aeration will implement to prevent the acceptance of prohibited material at the landfarm facility. In accordance with the provisions of Subsections C and D of Section 12 of 19.15.36 NMAC, the OCD may impose additional conditions to the existing surface waste management facility permit based upon the approved operational and waste acceptance plan.

OCD anticipates the submittal of the DAF removal report and the operational and waste acceptance plan. If you have any questions regarding this matter, please do not hesitate to contact Brad A. Jones of my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/baj

Cc: OCD District I Office, Hobbs

Jones, Brad A., EMNRD

From: Moore, Darrell [Darrell.Moore@hollycorp.com]
Sent: Friday, February 08, 2008 2:29 PM
To: Price, Wayne, EMNRD; Jim Wilson
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Possible improper waste disposal
Attachments: DAF Application Profile.pdf; DAF Disposal Final.pdf; 2 DAF Disposal Final.pdf

Wayne,

Navajo stopped the shipment of Dissolved Air Flotation (DAF) to Artesia Aeration as soon as you called me Wednesday. It is my understanding after discussions with Jim Wilson at Artesia Aeration that the material has been isolated and we will send trucks to the landfarm to pick it up and dispose of it at Controlled Recovery, Inc. We will complete that next week.

Attached to this email are the following:

1) Paperwork, non-hazardous waste manifests, and sample analysis that we sent to Artesia Aeration to get this material approved. We were given a verbal approval from Artesia Aeration to send the waste.

2) Approved C-138 from Controlled Recovery, Inc. dated August 20, 2007 to dispose of DAF.

As I mentioned on the phone, we have only sent this waste to Artesia Aeration since January 14, 2008 a total of 8 loads to our knowledge. The reason I say that is that our secretary is out recovering from surgery and we searched the files and found 8 manifests. I don't believe there are any more. If we find any new manifests we will forward those to you.

If there are any further questions concerning this matter, please don't hesitate to call me at 575-746-5281.

From: Price, Wayne, EMNRD [mailto:wayne.price@state.nm.us]
Sent: Wednesday, February 06, 2008 11:36 AM
To: Jim Wilson; Moore, Darrell
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: Possible improper waste disposal

Dear Mr. Wilson:

It has come to OCD's attention that possible RCRA listed DAF (dissolved air floatation waste normally know as K-048) waste generated at the Navajo Artesia Refinery has been disposed of at the Artesia Aeration land farm OCD permit # NM1-30. Please be aware your permit or the regulations do not allow such waste to be disposed of at your facility. You are hereby ordered to stop receiving such waste and perform the following actions:

1. Provide all paperwork, manifest, sample analysis concerning the waste in question to Mr. Brad Jones who will be on site tomorrow morning.
2. Also make arrangements so Mr. Jones may inspect all records during his inspection.
3. Isolate the waste in question until a final determination has been made by this agency for proper disposal.

Dear Mr. Moore:

Pursuant to our telephone conversation this morning you are hereby directed to stop disposing of the DAF waste generated at the Navajo Artesia Refinery at the Artesia Aeration landfarm OCD permit #NM1-30. You indicated this material is predominately dirt, scale, rust and is virtually oil free after it has gone thru the treatment process. You also indicated it is has been deemed non-hazardous. Please note landfarms are for remediating soils that have been contaminated with oilfield hydrocarbons. Since you indicated this material has already gone thru treatment it cannot be disposed of in the landfarm but must go to an OCD permitted landfill or another approved facility. You are hereby ordered to stop sending such waste to Artesia Aeration and perform the following actions today:

1. Provide a copy to this office of all of the paperwork, manifests, sample analysis, waste determinations concerning the waste in question.
2. Provide a copy or point out in your current discharge plan where this waste is approved to be disposed of.
3. Provide this agency a plan for approval to pick-up and properly dispose of the waste in question.

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462

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

Form C-138
Revised March 12, 2007

*Surface Waste Management Facility Operator and Generator shall maintain and make this documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. **Generator Name and Address:**
NAVAJO REFINERY

2. **Originating Site:**
ARTESIA FACILITY

3. **Location of Material (Street Address, City, State or ULSTR):**
501 E. MAIN, ARTESIA NM 88211

4. **Source and Description of Waste: 08-20-07 (RENEWAL OF PREVIOUS C-138 07-25-06B)**
DISSOLVED AIR FLOATATION (DAF) FLOAT.
ENCLOSED PREVIOUS C-138, NON-EXEMPT WASTE CERTIFICATE, ANALYTICAL, CHAIN OF CUSTODY AND LETTER STATING PROCESS HAS NOT CHANGED.

Estimated Volume 60 yd / unknown yd^3 / bbls Known Volume (to be entered by the operator at the end of the haul) _____ yd^3 / bbls

5. **GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS**

I, DARRELL MOORE, representative or authorized agent for NAVAJO REFINERY do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☐ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. *Operator Use Only: Waste Acceptance Frequency* ☐ *Monthly* ☐ *Weekly* ☐ *Per Load*

XX RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

☐ MSDS Information xx☐x RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description in Box 4)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

I, _____, representative for _____ do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

5. **Transporter: S BROTHERS**

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: CONTROLLED RECOVERY, INC. R-9166

Address of Facility: P.O. BOX 388, HOBBS, NM 88241

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☐ Landfarm ☒ Landfill ☐ Other

Waste Acceptance Status:

☒ **APPROVED** ☐ **DENIED** (Must Be Maintained As Permanent Record)

PRINT NAME: John Q. Barnidge TITLE: REP. CEO + PRES DATE: 08-20-07

SIGNATURE: JOHN Q. BARNIDGE TELEPHONE NO.: 505-393-1079

Surface Waste Management Facility Authorized Agent

NAVAJO REFINING COMPANY, L.P.

FAX
(505) 746-5283 DIV. ORDERS
(505) 746-5481 TRUCKING
(505) 746-5458 PERSONNEL

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159
TELEPHONE (505) 748-3311

FAX
(505) 746-5419 ACCOUNTING
(505) 746-5451 EXEC/MKTG
(505) 746-5421 ENGINEERING
(505) 746-5480 PIPELINE

August 30, 2007

Mr. Jim Wilson
Artesia Aeration, Inc

RE: Approval of DAF for Disposal at Artesia Aeration

Dear Jim,

Navajo recently sent you a TCLP analysis of our DAF waste stream. Also included in that analysis were readings for chlorides and paint filter. Based on the analysis from this grab sample, I certify by my signature below that this waste stream is non-hazardous and can be landfarmed under the limits set by the New Mexico Oil Conservation Division in NMAC 19.15.36.15.

Sincerely,
NAVAJO REFINING COMPANY

Darrell Moore

Darrell Moore
Environmental Manager for Water and Waste

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

Form C-138
Revised June 10, 2003

Submit Original
Plus 1 Copy
to Appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining C. 5. Originating Site Artesia NM
2. Management Facility Destination Artesia Aeration	6. Transporter S Brothers
3. Address of Facility Operator	8. State NM
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL: Dissolved Air Float from petroleum refining.

Estimated Volume 80 cy/week Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE _____ TITLE: _____ DATE: _____
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: _____ TELEPHONE NO. _____

E-MAIL ADDRESS _____

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	
	[illegible]			

GENERATOR

3. Generator s Name and Mailing Address
[illegible]
PO Box 159
Artesia, NM 88211-0159
4. Generator s Phone (575) 365-3311

NM 8723

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
[illegible]		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address **ARTESIA AERATION, L.L.C.** **MALJAMAR, NM**	10. US EPA ID Number	C. Facility s Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. [illegible]			10 yds	
b.				
c.				
d.				

Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[illegible]	7	2	[illegible]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of	

3. Generator s Name and Mailing Address

NO 8757

4. Generator s Phone ( )

5. Transporter 1 Company Name: S Brothers

6. US EPA ID Number

A. Transporter s Phone

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter s Phone

9. Designated Facility Name and Site Address

ARTESIA AERATION, L.L.C.
MALJAMAR, NM

10. US EPA ID Number

C. Facility s Phone

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF				
b.				
c.				
d.				

Additional Descriptions for Materials listed Above

E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Chris Mireles		01	19	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	
	NMD986018617			

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159
4. Generator s Phone (575) 746-3311

NO. 8713

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Contaminated Soil DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Robin Hearnsberger		1	25	13

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
D. Brown & Hearn		1	25	13

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159
4. Generator s Phone (575) 748-3311

NE 8711

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. **MALJAMAR, NM**		

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.			20 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
		1	25	

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	
	[illegible]			

GENERATOR

3. Generator s Name and Mailing Address
[illegible]
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3321

NM 8780

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
D Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address **ARTESIA AERATION, L.L.C.** **MALJAMAR, NM**	10. US EPA ID Number	C. Facility s Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. [illegible]			15 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez	4	4	05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		4	4	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 3	
	[illegible]			

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

NM 8778

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address **ARTESIA AERATION, L.L.C.** **MALJAMAR, NM**	10. US EPA ID Number	C. Facility s Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez	10	9	13

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	
NMD042912017			

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

NM 8779

4. Generator s Phone (575) 748-3311

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. **MALJAMAR, NM**		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b. CELL 4				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Fernandez	Carrie Fernandez	4	4	14

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		4	4	14

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
NMD048910817		

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co., LLC
PO Box 159
Artesia, NM 88211-0159

NO 8777

4. Generator s Phone (575) 748-3311

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. **MALJAMAR, NM**		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DNF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez			

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

e-Lab Analytical, Inc.

10450 Stancliff Rd, Suite 210 Houston, Texas 77099-4338 (281) 530-5656 Fax (281) 530-5887

August 24, 2007

Jeff Byrd
Navajo Refining Company
PO Box 159
Artesia, NM 88211

Tel: (505) 746-5468
Fax: (505) 746-5421

Re: DAF Disposal

Work Order : **0708424**

Dear Jeff Byrd,

e-Lab Analytical, Inc. received 1 sample on 8/14/2007 09:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by e-Lab Analytical, Inc. and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by e-Lab Analytical, Inc. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 8.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Jeffrey L Croston

Electronically approved by: Rebecca L. Hunt

Jeffrey L Croston
Project Manager

Certificate No: T104704231-06-TX

e-Lab Analytical, Inc.

Date: *August 24, 2007*

CLIENT: Navajo Refining Company
Project: DAF Disposal
Work Order: **0708424**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
0708424-01	DAF	Solid		8/13/2007 15:00	8/14/2007 09:00	☐

e-Lab Analytical, Inc.

Date: *August 24, 2007*

CLIENT:	Navajo Refining Company	**Client Sample ID:**	DAF
Work Order:	0708424	**Collection Date:**	8/13/2007 3:00:00 PM
Project:	DAF Disposal		
Lab ID:	0708424-01	**Matrix:**	SOLID

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
ANIONS BY ION CHROMATOGRAPHY - SOIL			**E300**		Prep Date: **8/23/2007**	Analyst: **LMD**
Chloride	**280**		**4.74**	**mg/Kg**	1	8/23/2007 8:20:00 PM
Surr: Selenate (surr)	*96.3*		*85-115*	*%REC*	1	8/23/2007 8:20:00 PM
PAINT FILTER TEST			**SW9095A**			Analyst: **LMD**
Free Liquid	**No Free Liquid**			**Pos/Neg**	1	8/20/2007

Qualifiers:

- ND - Not Detected at the Reporting Limit
- J - Analyte detected below quantitation limits
- B - Analyte detected in the associated Method Blank
- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc.

CLIENT: Navajo Refining Company
Work Order: 0708424
Project: DAF Disposal

Date: *Aug 24 2007*

QC BATCH REPORT

Batch ID: **25205** Instrument ID **ICS3000** Method: **E300**

MBLK Sample ID: **WBLKS1-082307** Units: **mg/Kg** Analysis Date: **08/23/07 19:26**
Client ID: Run ID: **ICS3000_070823A** SeqNo: **1195750** Prep Date: **8/23/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	ND	5.0	0	0	0	0-0	0			
Surr: Selenate (surr)	*48.66*	1.0	*50*	0	*97.3*	*85-115*	0			

LCS Sample ID: **WLCSS1-082307** Units: **mg/Kg** Analysis Date: **08/23/07 19:48**
Client ID: Run ID: **ICS3000_070823A** SeqNo: **1195751** Prep Date: **8/23/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	202.4	5.0	200	0	101	90-110	0			
Surr: Selenate (surr)	*50.53*	1.0	*50*	0	*101*	*85-115*	0			

MS Sample ID: **0708365-01AMS** Units: **mg/Kg** Analysis Date: **08/24/07 13:40**
Client ID: Run ID: **ICS3000_070823A** SeqNo: **1196296** Prep Date: **8/23/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	104.8	4.8	97.07	8.62	99	75-125	0			
Surr: Selenate (surr)	*47.03*	0.97	*48.54*	0	*96.9*	*80-120*	0			

MSD Sample ID: **0708365-01AMSD** Units: **mg/Kg** Analysis Date: **08/24/07 14:05**
Client ID: Run ID: **ICS3000_070823A** SeqNo: **1196297** Prep Date: **8/23/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	104.7	4.8	97.07	8.62	99	75-125	104.8	0.0742	20	
Surr: Selenate (surr)	*47.02*	0.97	*48.54*	0	*96.9*	*80-120*	47.03	*0.0206*	*20*	

DUP Sample ID: **0708365-01ADUP** Units: **mg/Kg** Analysis Date: **08/23/07 23:10**
Client ID: Run ID: **ICS3000_070823A** SeqNo: **1196293** Prep Date: **8/23/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	8.64	4.8	0	0	0	0-0	8.62	0.225	20	
Surr: Selenate (surr)	*47.23*	0.97	*48.54*	0	*97.3*	*85-115*	47.13	*0.206*	*20*	

The following samples were analyzed in this batch: 0708424-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708424
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53543** Instrument ID **WetChem** Method: **SW9095A** **(Dissolve)**

DUP Sample ID: **0708424-01ADUP** Units: **Pos/Neg** Analysis Date: **08/20/07 0:00**

Client ID: **DAF** Run ID: **WETCHEM_070820I** SeqNo: **1192730** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Free Liquid	ND	0	0	0	0		0	0	100	

The following samples were analyzed in this batch: 0708424-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

e-Lab Analytical
QUALITY • INTEGRITY • SERVICE

☐ e-Lab Analytical, Inc.
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page ____ of ____

The Chain of Custody is a Legal Document. All information must be completed accurately.

☐ e-Lab Analytical, Inc.
3352 128th Avenue
Holland, Michigan 49424
(Tel) 616.399.6070
(Fax) 616.399.6185

e-Lab Project Manager: | e-Lab Work Order #: D108282

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	DAF Disposal	A	TCLP VOA
Work Order		Project Number		B	" Semi VOA
Company Name	Navajo	Bill To Company		C	" Metals
Send Report To	J. Byrd	Invoice Attn		D	RCI
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	DAF	8/13/07	1500	S	9	1	X	X	X	X							
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: J. Byrd

Shipment Method: Fed Ex

Required Turnaround Time: (Check Box) ☐ STD 10 Wk Days ☒ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour ☒ Other

Results Due Date: 9/16/07

Relinquished by: J. Byrd	Date: 8/13/07	Time: 1615	Received by:	Notes: Need Complete Report	
Relinquished by:	Date:	Time:	Received by (Laboratory): 8-14-07/0900	e-Lab Analytical Cooler ID	Trip Blank Number
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):		

QC Package: (Check One Box Below)
☐ Level II Std QC ☐ TRRP Checklist
☐ Level III Std QC/Raw Data ☐ TRRP Level IV
☐ Level IV SW846/CLP
☐ Other _____

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to e-Lab Analytical, Inc.
2. Unless otherwise agreed in a formal contract, services provided by e-Lab Analytical, Inc. are expressly limited to the terms and conditions stated on the reverse.

e-Lab Analytical, Inc.

Sample Receipt Checklist

Client Name: **NAVAJO REFINING** Date/Time Received: **8/14/2007 9:00:00 AM**

Work Order Number **0708282** Received by: **RSZ**

Checklist completed by [signature] 8/14/07 (Signature / Date) Reviewed by [initials] 8/14/07 (Initials / Date)

Matrix: S Carrier name: FedEx

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s):	4.2c	002	
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑

Adjusted? _____ Checked by _____

Login Notes:

Client contacted: _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

0168282

e-Lab Analytical, Inc.
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. 281.530.5656
Fax. 218.530.5887

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CUSTODY SEAL

Date: 8/15/07 Time: 1610

Name: JEFF Byrd

Company: Nabors

Seal Broken By:

Date: 9-14-07

e-Lab Analytical, Inc.

10450 Stancliff Rd, Suite 210 Houston, Texas 77099-4338 (281) 530-5656 Fax (281) 530-5887

August 16, 2007

Jeff Byrd
Navajo Refining Company
PO Box 159
Artesia, NM 88211

Tel: (505) 746-5468
Fax: (505) 746-5421

Re: DAF Disposal

Work Order : **0708282**

Dear Jeff Byrd,

e-Lab Analytical, Inc. received 1 sample on 8/14/2007 09:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by e-Lab Analytical, Inc. and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by e-Lab Analytical, Inc. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 26.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Jeffrey L Croston

Electronically approved by: Rebecca L. Hunt

Jeffrey L Croston
Project Manager

ACCREDITED IN ACCORDANCE WITH nelac
Certificate No: T104704231-06-TX

e-Lab Analytical, Inc.

Date: *August 16, 2007*

CLIENT: Navajo Refining Company
Project: DAF Disposal
Work Order: **0708282**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
0708282-01	DAF	Soil		8/13/2007 15:00	8/14/2007 09:00	☐

e-Lab Analytical, Inc.

Date: *August 16, 2007*

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal
Lab ID: 0708282-01

Client Sample ID: DAF
Collection Date: 8/13/2007 3:00:00 PM
Matrix: SOIL

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
TCLP MERCURY			**SW7470**		Prep Date: **8/15/2007**	Analyst: **JCJ**
Mercury	ND		0.000200	mg/L	1	8/15/2007 1:47:46 PM
TCLP METALS, ICP			**SW1311/6020**		Prep Date: **8/15/2007**	Analyst: **ALR**
Arsenic	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Barium	**0.183**		**0.0500**	**mg/L**	10	8/15/2007 5:47:00 PM
Cadmium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Chromium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Lead	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Selenium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Silver	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
TCLP SEMIVOLATILES			**SW1311/8270**		Prep Date: **8/15/2007**	Analyst: **ACN**
2,4,5-Trichlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
2,4,6-Trichlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
2,4-Dinitrotoluene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Cresols, Total	**61**		**30**	**µg/L**	1	8/16/2007 3:16:00 PM
Hexachlorobenzene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Hexachlorobutadiene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Hexachloroethane	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Nitrobenzene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Pentachlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Pyridine	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Surr: 2,4,6-Tribromophenol	*64.0*		*42-124*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 2-Fluorobiphenyl	*67.0*		*48-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 2-Fluorophenol	*58.7*		*20-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 4-Terphenyl-d14	*65.6*		*51-135*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: Nitrobenzene-d5	*68.7*		*41-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: Phenol-d6	*63.0*		*20-120*	*%REC*	1	8/16/2007 3:16:00 PM
TCLP VOLATILES			**SW1311/8260B**		Prep Date: **8/14/2007**	Analyst: **PC**
1,1-Dichloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
1,2-Dichloroethane	ND		100	µg/L	20	8/15/2007 1:40:00 PM
1,4-Dichlorobenzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
2-Butanone	ND		200	µg/L	20	8/15/2007 1:40:00 PM
Benzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Carbon tetrachloride	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Chlorobenzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Chloroform	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Tetrachloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Trichloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Vinyl chloride	ND		100	µg/L	20	8/15/2007 1:40:00 PM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc.

Date: *August 16, 2007*

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal
Lab ID: 0708282-01

Client Sample ID: DAF
Collection Date: 8/13/2007 3:00:00 PM
Matrix: SOIL

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
Surr: 1,2-Dichloroethane-d4	*102*		*70-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: 4-Bromofluorobenzene	*105*		*72-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: Dibromofluoromethane	*103*		*71-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: Toluene-d8	*106*		*75-125*	*%REC*	20	8/15/2007 1:40:00 PM
CYANIDE, REACTIVE			**SW-846**			Analyst: **MAG**
Reactive Cyanide	ND		40.0	mg/Kg	1	8/13/2007
SULFIDE, REACTIVE			**SW-846**			Analyst: **MAG**
Reactive Sulfide	ND		40.0	mg/Kg	1	8/13/2007
IGNITABILITY FOR SOLIDS			**SW846, CHPT. 7.1.2**			Analyst: **RPM**
Burns vigorously and persistently	**No**				1	8/15/2007
Ignites spontaneously	**No**				1	8/15/2007
Ignites through friction	**No**				1	8/15/2007
Ignites under std. temp and pressure	**No**				1	8/15/2007
Ignites with moisture	**No**				1	8/15/2007
PH IN SOLID			**SW9045B**			Analyst: **TH**
pH	**7.19**		**0.100**	**pH Units**	1	8/15/2007

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc.

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

Date: *Aug 16 2007*

QC BATCH REPORT

Batch ID: **25068** Instrument ID **Mercury** Method: **SW7470**

MBLK Sample ID: **GBLKT1-081507** Units: **mg/L** Analysis Date: **08/15/07 13:14**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189823** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	ND	0.00020								

MBLK Sample ID: **GBLKW1-081507** Units: **mg/L** Analysis Date: **08/15/07 12:55**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189834** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	ND	0.00020								

LCS Sample ID: **GLCSW1-081507** Units: **mg/L** Analysis Date: **08/15/07 12:57**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189835** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	0.00516	0.00020	0.005	0	103	80-120	0			

LCSD Sample ID: **GLCSDW1-081507** Units: **mg/L** Analysis Date: **08/15/07 12:59**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189836** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	0.00492	0.00020	0.005	0	98.4	80-120	0.00516	4.76	25	

MS Sample ID: **0708254-01BMS** Units: **mg/L** Analysis Date: **08/15/07 13:06**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189816** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	0.00493	0.00020	0.005	-0.000016	98.9	75-125	0			

MSD Sample ID: **0708254-01BMSD** Units: **mg/L** Analysis Date: **08/15/07 13:08**
Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189819** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	0.00482	0.00020	0.005	-0.000016	96.7	75-125	0.00493	2.26	20	

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **25068** Instrument ID **Mercury** Method: **SW7470**

DUP Sample ID: **0708254-01BDUP** Units: **mg/L** Analysis Date: **08/15/07 13:03**

Client ID: Run ID: **MERCURY_070815A** SeqNo: **1189815** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	ND	0.00020	0	0	0	0-0	-0.000016	0	20	

The following samples were analyzed in this batch: 0708282-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **25074** Instrument ID **ICPMS02** Method: **SW1311/6020**

MBLK Sample ID: **MBLKT1-081407** Units: **mg/L** Analysis Date: **08/15/07 17:15**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190263** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	ND	0.050								
Barium	ND	0.050								
Cadmium	ND	0.050								
Chromium	ND	0.050								
Lead	ND	0.050								
Selenium	ND	0.050								
Silver	ND	0.050								

MBLK Sample ID: **MBLKW3-081507** Units: **mg/L** Analysis Date: **08/15/07 17:21**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190264** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	ND	0.050								
Barium	ND	0.050								
Cadmium	ND	0.050								
Chromium	ND	0.050								
Lead	ND	0.050								
Selenium	ND	0.050								
Silver	ND	0.050								

LCS Sample ID: **MLCSW3-081507** Units: **mg/L** Analysis Date: **08/15/07 17:28**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190265** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	0.1807	0.050	0.2	0	90.4	80-120	0			
Barium	0.1939	0.050	0.2	0	97	80-120	0			
Cadmium	0.1976	0.050	0.2	0	98.8	80-120	0			
Chromium	0.1906	0.050	0.2	0	95.3	80-120	0			
Lead	0.2057	0.050	0.2	0	103	80-120	0			
Selenium	0.2032	0.050	0.2	0	102	80-120	0			
Silver	0.1866	0.050	0.2	0	93.3	80-120	0			

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J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **25074** Instrument ID **ICPMS02** Method: **SW1311/6020**

MS Sample ID: **0708293-01AMS** Units: **mg/L** Analysis Date: **08/15/07 18:43**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190276** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	0.193	0.050	0.2	0.0004601	96.3	75-125	0			
Barium	0.9508	0.050	0.2	0.7502	100	75-125	0			
Cadmium	0.197	0.050	0.2	0.001594	97.7	75-125	0			
Chromium	0.2012	0.050	0.2	0.01973	90.7	75-125	0			
Lead	0.2013	0.050	0.2	0.005644	97.8	75-125	0			
Selenium	0.2181	0.050	0.2	0.009863	104	75-125	0			
Silver	0.1717	0.050	0.2	-0.002527	87.1	75-125	0			

MSD Sample ID: **0708293-01AMSD** Units: **mg/L** Analysis Date: **08/15/07 18:49**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190277** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	0.1918	0.050	0.2	0.0004601	95.7	75-125	0.193	0.624	25	
Barium	0.9347	0.050	0.2	0.7502	92.2	75-125	0.9508	1.71	25	
Cadmium	0.1959	0.050	0.2	0.001594	97.2	75-125	0.197	0.56	25	
Chromium	0.1957	0.050	0.2	0.01973	88	75-125	0.2012	2.77	25	
Lead	0.2006	0.050	0.2	0.005644	97.5	75-125	0.2013	0.348	25	
Selenium	0.2191	0.050	0.2	0.009863	105	75-125	0.2181	0.457	25	
Silver	0.1644	0.050	0.2	-0.002527	83.5	75-125	0.1717	4.34	25	

DUP Sample ID: **0708293-01ADUP** Units: **mg/L** Analysis Date: **08/15/07 18:31**
Client ID: Run ID: **ICPMS02_070815A** SeqNo: **1190274** Prep Date: **8/15/2007** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	ND	0.050	0	0	0	0-0	0.0004601	0	25	
Barium	0.7598	0.050	0	0	0	0-0	0.7502	1.27	25	
Cadmium	ND	0.050	0	0	0	0-0	0.001594	0	25	
Chromium	0.01939	0.050	0	0	0	0-0	0.01973	0	25	J
Lead	0.004559	0.050	0	0	0	0-0	0.005644	0	25	J
Selenium	ND	0.050	0	0	0	0-0	0.009863	0	25	
Silver	ND	0.050	0	0	0	0-0	-0.002527	0	25	

The following samples were analyzed in this batch: 0708282-01A

ND - Not Detected at the Reporting Limit
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S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
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U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **25077** Instrument ID **SV-3** Method: **SW8270**

MBLK Sample ID: **SBLKT1-070815** Units: **µg/L** Analysis Date: **08/16/07 13:54**
Client ID: Run ID: **SV-3_070816A** SeqNo: **1190903** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
2,4,5-Trichlorophenol	ND	5.0								
2,4,6-Trichlorophenol	ND	5.0								
2,4-Dinitrotoluene	ND	5.0								
Cresols, Total	ND	5.0								
Hexachlorobenzene	ND	5.0								
Hexachlorobutadiene	ND	5.0								
Hexachloroethane	ND	5.0								
Nitrobenzene	ND	5.0								
Pentachlorophenol	ND	5.0								
Pyridine	ND	5.0								
Surr: 2,4,6-Tribromophenol	*70.22*	0	*100*	0	*70.2*	*42-124*	0			
Surr: 2-Fluorobiphenyl	*75.53*	0	*100*	0	*75.5*	*48-120*	0			
Surr: 2-Fluorophenol	*68.54*	0	*100*	0	*68.5*	*20-120*	0			
Surr: 4-Terphenyl-d14	*79.46*	0	*100*	0	*79.5*	*51-135*	0			
Surr: Nitrobenzene-d5	*80.11*	0	*100*	0	*80.1*	*41-120*	0			
Surr: Phenol-d6	*73.01*	0	*100*	0	*73*	*20-120*	0			

LCS Sample ID: **SLCST1-070815** Units: **µg/L** Analysis Date: **08/16/07 14:22**
Client ID: Run ID: **SV-3_070816A** SeqNo: **1190904** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
2,4,5-Trichlorophenol	87.64	5.0	100	0	87.6	52-115	0			
2,4,6-Trichlorophenol	81.31	5.0	100	0	81.3	56-115	0			
2,4-Dinitrotoluene	41.25	5.0	50	0	82.5	56-115	0			
Cresols, Total	202.3	5.0	200	0	101	48-115	0			
Hexachlorobenzene	44.78	5.0	50	0	89.6	54-115	0			
Hexachlorobutadiene	45.31	5.0	50	0	90.6	51-115	0			
Hexachloroethane	42.5	5.0	50	0	85	54-115	0			
Nitrobenzene	44.78	5.0	50	0	89.6	40-124	0			
Pentachlorophenol	83.93	5.0	100	0	83.9	45-125	0			
Pyridine	31.65	5.0	50	0	63.3	34-115	0			
Surr: 2,4,6-Tribromophenol	*80.57*	0	*100*	0	*80.6*	*42-124*	0			
Surr: 2-Fluorobiphenyl	*78.86*	0	*100*	0	*78.9*	*48-120*	0			
Surr: 2-Fluorophenol	*73.94*	0	*100*	0	*73.9*	*20-120*	0			
Surr: 4-Terphenyl-d14	*80.66*	0	*100*	0	*80.7*	*51-135*	0			
Surr: Nitrobenzene-d5	*84.11*	0	*100*	0	*84.1*	*41-120*	0			
Surr: Phenol-d6	*76.29*	0	*100*	0	*76.3*	*20-120*	0			

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CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **25077** Instrument ID **SV-3** Method: **SW8270**

LCSD Sample ID: **SLCSDT1-070815** Units: **µg/L** Analysis Date: **08/16/07 14:49**

Client ID: Run ID: **SV-3_070816A** SeqNo: **1190905** Prep Date: **8/15/2007** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
2,4,5-Trichlorophenol	83.3	5.0	100	0	83.3	52-115	87.64	5.08	30	
2,4,6-Trichlorophenol	81.91	5.0	100	0	81.9	56-115	81.31	0.731	30	
2,4-Dinitrotoluene	38.28	5.0	50	0	76.6	56-115	41.25	7.48	30	
Cresols, Total	193.9	5.0	200	0	97	48-115	202.3	4.22	30	
Hexachlorobenzene	44.33	5.0	50	0	88.7	54-115	44.78	1.02	30	
Hexachlorobutadiene	41.47	5.0	50	0	82.9	51-115	45.31	8.84	30	
Hexachloroethane	41.33	5.0	50	0	82.7	54-115	42.5	2.77	30	
Nitrobenzene	43.72	5.0	50	0	87.4	40-124	44.78	2.39	30	
Pentachlorophenol	83.14	5.0	100	0	83.1	45-125	83.93	0.951	30	
Pyridine	30.15	5.0	50	0	60.3	34-115	31.65	4.83	30	
Surr: 2,4,6-Tribromophenol	*79.29*	0	*100*	0	*79.3*	*42-124*	80.57	*1.61*	*30*	
Surr: 2-Fluorobiphenyl	*78.23*	0	*100*	0	*78.2*	*48-120*	78.86	*0.806*	*30*	
Surr: 2-Fluorophenol	*72.85*	0	*100*	0	*72.8*	*20-120*	73.94	*1.49*	*30*	
Surr: 4-Terphenyl-d14	*80.29*	0	*100*	0	*80.3*	*51-135*	80.66	*0.465*	*30*	
Surr: Nitrobenzene-d5	*82.54*	0	*100*	0	*82.5*	*41-120*	84.11	*1.89*	*30*	
Surr: Phenol-d6	*74.73*	0	*100*	0	*74.7*	*20-120*	76.29	*2.07*	*30*	

The following samples were analyzed in this batch: 0708282-01A

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CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53443** Instrument ID **VOA1** Method: **SW1311/8260**

MBLK Sample ID: **VBLKW-081507** Units: **µg/L** Analysis Date: **08/15/07 11:31**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190701** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	ND	5.0								
1,2-Dichloroethane	ND	5.0								
1,4-Dichlorobenzene	ND	5.0								
2-Butanone	ND	10								
Benzene	ND	5.0								
Carbon tetrachloride	ND	5.0								
Chlorobenzene	ND	5.0								
Chloroform	ND	5.0								
Tetrachloroethene	ND	5.0								
Trichloroethene	ND	5.0								
Vinyl chloride	ND	5.0								
Surr: 1,2-Dichloroethane-d4	*49.44*	5.0	*50*	0	*98.9*	*70-125*		0		
Surr: 4-Bromofluorobenzene	*51.61*	5.0	*50*	0	*103*	*72.4-125*		0		
Surr: Dibromofluoromethane	*51.92*	5.0	*50*	0	*104*	*71.2-125*		0		
Surr: Toluene-d8	*50.51*	5.0	*50*	0	*101*	*75-125*		0		

MBLK Sample ID: **VBLKTK1-081007** Units: **µg/L** Analysis Date: **08/15/07 11:57**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190702** Prep Date: **8/10/2007** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	ND	100								
1,2-Dichloroethane	ND	100								
1,4-Dichlorobenzene	ND	100								
2-Butanone	ND	200								
Benzene	ND	100								
Carbon tetrachloride	ND	100								
Chlorobenzene	ND	100								
Chloroform	ND	100								
Tetrachloroethene	ND	100								
Trichloroethene	ND	100								
Vinyl chloride	ND	100								
Surr: 1,2-Dichloroethane-d4	*970.1*	100	*1000*	0	*97*	*70-125*		0		
Surr: 4-Bromofluorobenzene	*1055*	100	*1000*	0	*106*	*72.4-125*		0		
Surr: Dibromofluoromethane	*993.4*	100	*1000*	0	*99.3*	*71.2-125*		0		
Surr: Toluene-d8	*1032*	100	*1000*	0	*103*	*75-125*		0		

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R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53443** Instrument ID **VOA1** Method: **SW1311/8260**

MBLK Sample ID: **VBLKTK2-081407** Units: **µg/L** Analysis Date: **08/15/07 12:23**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190703** Prep Date: **8/14/2007** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	ND	100								
1,2-Dichloroethane	ND	100								
1,4-Dichlorobenzene	ND	100								
2-Butanone	ND	200								
Benzene	ND	100								
Carbon tetrachloride	ND	100								
Chlorobenzene	ND	100								
Chloroform	ND	100								
Tetrachloroethene	ND	100								
Trichloroethene	ND	100								
Vinyl chloride	ND	100								
Surr: 1,2-Dichloroethane-d4	*1015*	100	*1000*	0	*102*	*70-125*	0			
Surr: 4-Bromofluorobenzene	*1020*	100	*1000*	0	*102*	*72.4-125*	0			
Surr: Dibromofluoromethane	*1023*	100	*1000*	0	*102*	*71.2-125*	0			
Surr: Toluene-d8	*1037*	100	*1000*	0	*104*	*75-125*	0			

LCS Sample ID: **VLCSW-081507** Units: **µg/L** Analysis Date: **08/15/07 10:40**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190700** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	49.96	5.0	50	0	99.9	73-124	0			
1,2-Dichloroethane	52.01	5.0	50	0	104	76-120	0			
1,4-Dichlorobenzene	48.57	5.0	50	0	97.1	70-130	0			
2-Butanone	102.8	10	100	0	103	70-130	0			
Benzene	49.68	5.0	50	0	99.4	70-128	0			
Carbon tetrachloride	54.52	5.0	50	0	109	70-130	0			
Chlorobenzene	48.42	5.0	50	0	96.8	72-127	0			
Chloroform	50.28	5.0	50	0	101	70-130	0			
Tetrachloroethene	50.24	5.0	50	0	100	70-130	0			
Trichloroethene	48.39	5.0	50	0	96.8	72-129	0			
Vinyl chloride	45.21	5.0	50	0	90.4	70-130	0			
Surr: 1,2-Dichloroethane-d4	*51.8*	5.0	*50*	0	*104*	*70-125*	0			
Surr: 4-Bromofluorobenzene	*52.18*	5.0	*50*	0	*104*	*72-125*	0			
Surr: Dibromofluoromethane	*52.53*	5.0	*50*	0	*105*	*71-125*	0			
Surr: Toluene-d8	*53.15*	5.0	*50*	0	*106*	*75-125*	0			

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R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
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E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53443** Instrument ID **VOA1** Method: **SW1311/8260**

MS Sample ID: **0708206-01AMS** Units: **µg/L** Analysis Date: **08/15/07 14:05**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190707** Prep Date: **8/14/2007** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	856	100	1000	0	85.6	73-124	0			
1,2-Dichloroethane	1078	100	1000	0	108	76-120	0			
1,4-Dichlorobenzene	930.3	100	1000	0	93	70-130	0			
2-Butanone	2232	200	2000	0	112	70-130	0			
Benzene	965.4	100	1000	0	96.5	70-128	0			
Carbon tetrachloride	951.3	100	1000	0	95.1	70-130	0			
Chlorobenzene	910.5	100	1000	0	91	72-127	0			
Chloroform	955.1	100	1000	0	95.5	70-130	0			
Tetrachloroethene	875.4	100	1000	0	87.5	70-130	0			
Trichloroethene	905	100	1000	0	90.5	72-129	0			
Vinyl chloride	744.7	100	1000	0	74.5	70-130	0			
Surr: 1,2-Dichloroethane-d4	*1049*	100	*1000*	0	*105*	*70-125*	0			
Surr: 4-Bromofluorobenzene	*1027*	100	*1000*	0	*103*	*72-125*	0			
Surr: Dibromofluoromethane	*1049*	100	*1000*	0	*105*	*71-125*	0			
Surr: Toluene-d8	*1012*	100	*1000*	0	*101*	*75-125*	0			

MSD Sample ID: **0708206-01AMSD** Units: **µg/L** Analysis Date: **08/15/07 14:31**

Client ID: Run ID: **VOA1_070815B** SeqNo: **1190709** Prep Date: **8/14/2007** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
1,1-Dichloroethene	872.4	100	1000	0	87.2	73-124	856	1.9	20	
1,2-Dichloroethane	1060	100	1000	0	106	76-120	1078	1.66	20	
1,4-Dichlorobenzene	933.3	100	1000	0	93.3	70-130	930.3	0.327	20	
2-Butanone	2197	200	2000	0	110	70-130	2232	1.57	20	
Benzene	*960.9*	*100*	*1000*	*0*	*96.1*	*70-128*	*965.4*	*0.465*	*20*	
Carbon tetrachloride	921.8	100	1000	0	92.2	70-130	951.3	3.15	20	
Chlorobenzene	952.6	100	1000	0	95.3	72-127	910.5	4.52	20	
Chloroform	970.2	100	1000	0	97	70-130	955.1	1.56	20	
Tetrachloroethene	*880.1*	*100*	*1000*	*0*	*88*	*70-130*	*875.4*	*0.541*	*20*	
Trichloroethene	906	100	1000	0	90.6	72-129	905	0.112	20	
Vinyl chloride	804.4	100	1000	0	80.4	70-130	744.7	7.71	20	
Surr: 1,2-Dichloroethane-d4	*1060*	100	*1000*	0	*106*	*70-125*	1049	*1.1*	*20*	
Surr: 4-Bromofluorobenzene	*1022*	100	*1000*	0	*102*	*72-125*	1027	*0.482*	*20*	
Surr: Dibromofluoromethane	*1049*	100	*1000*	0	*105*	*71-125*	1049	*0.038*	*20*	
Surr: Toluene-d8	*1053*	100	*1000*	0	*105*	*75-125*	1012	*3.99*	*20*	

The following samples were analyzed in this batch: 0708282-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53385** Instrument ID **WetChem** Method: **SW846, Chpt.**

DUP Sample ID: **0708311-02D DUP** Units: Analysis Date: **08/15/07 0:00**

Client ID: Run ID: **WETCHEM_070815E** SeqNo: **1189790** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Burns vigorously and persistently	ND	0	0	0	0	0-0	0	0	0	
Ignites spontaneously	ND	0	0	0	0	0-0	0	0	0	
Ignites through friction	ND	0	0	0	0	0-0	0	0	0	
Ignites under std. temp and pressur	ND	0	0	0	0	0-0	0	0	0	
Ignites with moisture	ND	0	0	0	0	0-0	0	0	0	

The following samples were analyzed in this batch: 0708282-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal

QC BATCH REPORT

Batch ID: **R53395** Instrument ID **WetChem** Method: **SW9045B**

LCS Sample ID: **WLCSS-081507** Units: **pH Units** Analysis Date: **08/15/07 0:00**

Client ID: Run ID: **WETCHEM_070815H** SeqNo: **1189915** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	6.03	0.10	6	0	100	90-110	0			

DUP Sample ID: **0708282-01ADUP** Units: **pH Units** Analysis Date: **08/15/07 0:00**

Client ID: **DAF** Run ID: **WETCHEM_070815H** SeqNo: **1189928** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	7.22	0.10	0	0	0	0-0	7.19	0.416	20	

The following samples were analyzed in this batch: 0708282-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

e-Lab Analytical
QUALITY • INTEGRITY • SERVICE

☐ e-Lab Analytical, Inc.
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page ____ of ____

The Chain of Custody is a Legal Document. All information must be completed accurately.

☐ e-Lab Analytical, Inc.
3352 128th Avenue
Holland, Michigan 49424
(Tel) 616.399.6070
(Fax) 616.399.6185

e-Lab Project Manager: | e-Lab Work Order #: 0708282

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	DAF Disposal	A	TCLP VOA
Work Order		Project Number		B	" Semi VOA
Company Name	Navajo	Bill To Company		C	" Metals
Send Report To	J. Byrd	Invoice Attn		D	RCI
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	DAF	8/13/07	1500	S	4	1	X	X	X	X							
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: J. Byrd

Shipment Method: FedEx

Required Turnaround Time: (Check Box) ☐ STD-10 Wk Days ☐ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour ☒ Other

Results Due Date: 9/16/07

Relinquished by: J. Byrd — Date: 8/13/07 — Time: 1615

Received by: Rw

Notes: Need Complete Report

Relinquished by: — Date: — Time:

Received by (Laboratory): 8/14/07 0900

Logged by (Laboratory): — Date: — Time:

Checked by (Laboratory):

e-Lab Analytical Cooler ID | Trip Blank Number

QC Package: (Check One Box Below)
☐ Level II Std QC ☐ TRRP Checklist
☐ Level III Std QC/Raw Data ☐ TRRP Level IV
☐ Level IV SW846/CLP
☐ Other

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to e-Lab Analytical, Inc.
2. Unless otherwise agreed in a formal contract, services provided by e-Lab Analytical, Inc. are expressly limited to the terms and conditions stated on the reverse.

e-Lab Analytical, Inc.

Sample Receipt Checklist

Client Name: **NAVAJO REFINING** Date/Time Received: **8/14/2007 9:00:00 AM**

Work Order Number **0708282** Received by: **RSZ**

Checklist completed by [signature] 8/14/07 (Signature / Date) Reviewed by [signature] 8/14/07 (Initials / Date)

Matrix: S Carrier name: FedEx

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s):	4.2c	002	
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑

Adjusted? _____ Checked by _____

Login Notes:

Client contacted: _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

0168A&L

e-Lab Analytical, Inc.
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. 281.530.5656
Fax. 218.530.5887

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CUSTODY SEAL

Date: 8/16/07 Time: 1610
Name: JEFF Byrd
Company: Navajo

Seal Broken By:
Date: 9-14-07

e-Lab Analytical, Inc

Date: *August 16, 2007*

CLIENT: e-Lab Analytical, Inc
Project: 0708282
Work Order: **0708365**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
0708365-01	0708282-01B	Soil		8/13/2007 15:00	8/15/2007 09:50	☐

CLIENT: e-Lab Analytical, Inc
Project: 0708282
Work Order: 0708365

Case Narrative

Batch R51624 Reactive Cyanide LCS/LCSD and MS/MSD RPDs were above control limits. The individual recoveries were in control.

e-Lab Analytical, Inc

Date: *August 16, 2007*

CLIENT: e-Lab Analytical, Inc
Work Order: 0708365
Project: 0708282
Lab ID: 0708365-01

Client Sample ID: 0708282-01B
Collection Date: 8/13/2007 3:00:00 PM
Matrix: SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
CYANIDE, REACTIVE			**EPA 7.3.3.2**			Analyst: **ED**
Cyanide, Reactive	ND	40.0		mg/Kg	1	8/13/2007
SULFIDE, REACTIVE			**EPA 7.3.4.2**			Analyst: **ED**
Sulfide, Reactive	ND	40.0		mg/Kg	1	8/13/2007

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

CLIENT: e-Lab Analytical, Inc
Work Order: 0708365
Project: 0708282

Date: *Aug 16 2007*

QC BATCH REPORT

Batch ID: **R51623** Instrument ID **WETCHEM** Method: **EPA 7.3.4.2**

MBLK Sample ID **MB-R51623** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**

Client ID: Run ID: **WETCHEM_070813M** SeqNo: **839935** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfide, Reactive	ND	40								

The following samples were analyzed in this batch: 0708365-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: e-Lab Analytical, Inc
Work Order: 0708365
Project: 0708282

QC BATCH REPORT

Batch ID: **R51624** Instrument ID **WETCHEM** Method: **EPA 7.3.3.2**

MBLK Sample ID **WBLKW1081307** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**
Client ID: Run ID: **WETCHEM_070813N** SeqNo: **839943** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Cyanide, Reactive	ND	40								

LCS Sample ID **WLCSW1081307** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**
Client ID: Run ID: **WETCHEM_070813N** SeqNo: **839944** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Cyanide, Reactive	352.3	40	620	0	56.8	2.8-70	0			

LCSD Sample ID **WLCSDW1081307** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**
Client ID: Run ID: **WETCHEM_070813N** SeqNo: **839954** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Cyanide, Reactive	146.8	40	620	0	23.7	2.8-70	352.3	82.4	35	R

MS Sample ID **0708253-02A MS** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**
Client ID: Run ID: **WETCHEM_070813N** SeqNo: **839952** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Cyanide, Reactive	411	40	620	0	66.3	2.8-70	0			

MSD Sample ID **0708253-02A MSD** Units: **mg/Kg** Analysis Date: **08/13/07 0:00**
Client ID: Run ID: **WETCHEM_070813N** SeqNo: **839953** Prep Date: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Cyanide, Reactive	146.8	40	620	0	23.7	2.8-70	411	94.7	35	R

The following samples were analyzed in this batch: 0708365-01A

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc. Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

0708365

Subcontractor:
e-Lab Analytical, Inc.
3352 128th Ave.
Holland, MI 49424

TEL: (616) 399-6070
FAX: (616) 399-6185
Acct #:

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CHAIN-OF-CUSTODY RECORD

Date: Aug 14, 200
COC ID: 5412
Due Date 8/16/2007

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	0708282	A	Cyanide, Reactive (SW-846)
Work Order		Project Number		B	Sulfide, Reactive (SW-846)
Company Name	e-Lab Analytical, Inc.	Bill To Company	e-Lab Analytical, Inc.	C	
Send Report To	Jeffrey L Croston	Inv Attn	Accounts Payable	D	
Address	10450 Stancliff Rd, Suite 210	Address	10450 Stancliff Rd, Suite 210	E	
				F	
City/State/Zip	Houston, Texas 77099-4338	City/State/Zip	Houston, Texas 77099-4338	G	
Phone	(281) 530-5656	Phone	(281) 530-5656	H	
Fax	(281) 530-5887	Fax	(281) 530-5887	I	
eMail Address	jcroston@elabi.com	eMail CC	oelliston@elabi.com	J	

Sample ID	Matrix	Collection Date	Bottle	A	B	C	D	E	F	G	H	I	J
0708282-01B (DAF)	Soil	8/13/2007 15:00	(1) 2OZGNEAT	X	X								

Comments:

Please analyze for Reactive Cyanide & Reactive Sulfide.

Relinquished by:	Date/Time	Received by:	Date/Time	Cooler IDs	Report/QC Level
					Std
Relinquished by:	Date/Time	Received by:	Date/Time		
UPS	8/14/07 UPS 8/15/07 0950	UPS	8/14/07 8/15/07 0950		

e-Lab Analytical, Inc

Sample Receipt Checklist

Client Name ELAB-HOU

Date/Time Received: 8/15/2007 9:50:00 AM

Work Order Number 0708365

Received by: AJK

Checklist completed by _____ Signature 8/15/07 Date

Reviewed by _____ Initials 8/15/07 Date

Matrix: Soil

Carrier name: UPS

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s):	1.6°C		
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑

Adjusted? _____ Checked by _____

Login Notes:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

1500

UPS Saver® Shipping Document

SHIPMENT FROM

UPS ACCOUNT NO 698174

REFERENCE NUMBER SUB

RICHARD SANCHEZ TELEPHONE 281-530-5656

E-LAB, INC.

1450 STANCLIFF RD STE #210

HOUSTON TX 77099

DELIVERY TO

RECEIVING TELEPHONE 616-399-6070

E-LAB, INC.

3352 128TH AVE Residential ☐

HOLLAND MI 49424

(URC v.48.0A 10/2005)
0201952542609 1/05 S

United Parcel Service, Louisville, KY

WEIGHT	WEIGHT	DIMENSIONAL WEIGHT	LARGE AIR PACKAGE	SHIPPER RELEASE
	1		☐	☐

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1/A

DWS ID Label

1Z6981742310029625

e-Lab Analytical, Inc.
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. 281.530.5656
Fax. 218.530.5887

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CUSTOD

Date: 8/15/07
Name: RACHEL SANCHEZ
Company: eAB

By:
Date: 8/15/07

07083651

Jones, Brad A., EMNRD

From: Moore, Darrell [Darrell.Moore@hollycorp.com]
Sent: Wednesday, February 06, 2008 2:38 PM
To: Price, Wayne, EMNRD; Jim Wilson; Lackey, Johnny
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Possible improper waste disposal

This waste is NOT a listed RCRA waste at Navajo Refining-Artesia Plant.
The issue went thru a listing determination and was signed off on by NMED in a letter from Dave Cobrain to Darrell Moore dated July 19, 2000.
This letter was Cc'ed to Wayne Price, among others. The legal issue is that at Navajo Refining our DAF Unit is DOWNSTREAM of ABT (Agressive Bilogical Treatment) in our wastewater tanks. Therefore , by rule, it is non-hazardous. As an added precaution, we have sampled this waste numerous times and it has always passed the TCLP. The last test was done in the last quarter of 2007. The waste is NON-HAZARDOUS!

-----Original Message-----
From: Price, Wayne, EMNRD [mailto:wayne.price@state.nm.us]
Sent: Wednesday, February 06, 2008 11:36 AM
To: Jim Wilson; Moore, Darrell
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: Possible improper waste disposal

Dear Mr. Wilson:

It has come to OCD's attention that possible RCRA listed DAF (dissolved air floatation waste normally know as K-048) waste generated at the Navajo Artesia Refinery has been disposed of at the Artesia Aeration land farm OCD permit # NM1-30. Please be aware your permit or the regulations do not allow such waste to be disposed of at your facility.
You are hereby ordered to stop receiving such waste and perform the following actions:

1. Provide all paperwork, manifest, sample analysis concerning the waste in question to Mr. Brad Jones who will be on site tomorrow morning.

2. Also make arrangements so Mr. Jones may inspect all records during his inspection.

3. Isolate the waste in question until a final determination has been made by this agency for proper disposal.

Dear Mr. Moore:

Pursuant to our telephone conversation this morning you are hereby directed to stop disposing of the DAF waste generated at the Navajo Artesia Refinery at the Artesia Aeration landfarm OCD permit #NM1-30.
You indicated this material is predominately dirt, scale, rust and is virtually oil free after it has gone thru the treatment process. You
also indicated it is has been deemed non-hazardous. Please note
landfarms are for remediating soils that have been contaminated with oilfield hydrocarbons. Since you indicated this material has already gone thru treatment it cannot be disposed of in the landfarm but must go to an OCD permitted landfill or another approved facility. You are hereby ordered to stop sending such waste to Artesia Aeration and perform the following actions today:

1. Provide a copy to this office of all of the
paperwork, manifests, sample analysis, waste determinations concerning the waste in question.

2. Provide a copy or point out in your current
discharge plan where this waste is approved to be disposed of.

3. Provide this agency a plan for approval to pick-up
and properly dispose of the waste in question.

Wayne Price-Environmental Bureau Chief

Oil Conservation Division

1220 S. Saint Francis

Santa Fe, NM 87505

E-mail wayne.price@state.nm.us <mailto:wayne.price@state.nm.us>

Tele: 505-476-3490

Fax: 505-476-3462

Jones, Brad A., EMNRD

From: Price, Wayne, EMNRD

Sent: Wednesday, February 06, 2008 11:36 AM

To: Jim Wilson; darrell.moore@navajo-refining.com

Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD

Subject: Possible improper waste disposal

Contacts: Jim Wilson

Dear Mr. Wilson:

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3. Isolate the waste in question until a final determination has been made by this agency for proper disposal.

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1. Provide a copy to this office of all of the paperwork, manifests, sample analysis, waste determinations concerning the waste in question.
2. Provide a copy or point out in your current discharge plan where this waste is approved to be disposed of.
3. Provide this agency a plan for approval to pick-up and properly dispose of the waste in question.

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462

Navajo REFINING COMPANY, L.P.

FAX
(505) 746-5283 DIV. ORDERS
(505) 746-5481 TRUCKING
(505) 746-5458 PERSONNEL

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159
TELEPHONE (505) 748-3311

FAX
(505) 746-5419 ACCOUNTING
(505) 746-5451 EXEC/MKTG
(505) 746-5421 ENGINEERING
(505) 746-5480 PIPELINE

August 30, 2007

Mr. Jim Wilson
Artesia Aeration, Inc

RE: Approval of DAF for Disposal at Artesia Aeration

Dear Jim,

Navajo recently sent you a TCLP analysis of our DAF waste stream. Also included in that analysis were readings for chlorides and paint filter. Based on the analysis from this grab sample, I certify by my signature below that this waste stream is non-hazardous and can be landfarmed under the limits set by the New Mexico Oil Conservation Division in NMAC 19.15.36.15.

Sincerely,
NAVAJO REFINING COMPANY

Darrell Moore

Darrell Moore
Environmental Manager for Water and Waste

Dear Jim
Attached DAF
Data

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

Form C-138
Revised June 10, 2003

Submit Original
Plus 1 Copy
to Appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining C 5. Originating Site Artesia NM
2. Management Facility Destination Artesia Aeration	6. Transporter S Brothers
3. Address of Facility Operator	8. State NM
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL: Dissolved Air Float from petroleum refining.

Estimated Volume 80 cy/week Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE _____ TITLE: _____ DATE: _____
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: _____ TELEPHONE NO. _____

E-MAIL ADDRESS _____

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

e-Lab Analytical, Inc.

Date: *August 16, 2007*

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal
Lab ID: 0708282-01

Client Sample ID: DAF
Collection Date: 8/13/2007 3:00:00 PM
Matrix: SOIL

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
TCLP MERCURY			**SW7470**		Prep Date: **8/15/2007**	Analyst: **JCJ**
Mercury	ND		0.000200	mg/L	1	8/15/2007 1:47:46 PM
TCLP METALS, ICP			**SW1311/6020**		Prep Date: **8/15/2007**	Analyst: **ALR**
Arsenic	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Barium	0.183		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Cadmium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Chromium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Lead	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Selenium	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
Silver	ND		0.0500	mg/L	10	8/15/2007 5:47:00 PM
TCLP SEMIVOLATILES			**SW1311/8270**		Prep Date: **8/15/2007**	Analyst: **ACN**
2,4,5-Trichlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
2,4,6-Trichlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
2,4-Dinitrotoluene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Cresols, Total	61		30	µg/L	1	8/16/2007 3:16:00 PM
Hexachlorobenzene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Hexachlorobutadiene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Hexachloroethane	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Nitrobenzene	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Pentachlorophenol	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Pyridine	ND		5.0	µg/L	1	8/16/2007 3:16:00 PM
Surr: 2,4,6-Tribromophenol	*64.0*		*42-124*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 2-Fluorobiphenyl	*67.0*		*48-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 2-Fluorophenol	*58.7*		*20-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: 4-Terphenyl-d14	*65.6*		*51-135*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: Nitrobenzene-d5	*68.7*		*41-120*	*%REC*	1	8/16/2007 3:16:00 PM
Surr: Phenol-d6	*63.0*		*20-120*	*%REC*	1	8/16/2007 3:16:00 PM
TCLP VOLATILES			**SW1311/8260B**		Prep Date: **8/14/2007**	Analyst: **PC**
1,1-Dichloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
1,2-Dichloroethane	ND		100	µg/L	20	8/15/2007 1:40:00 PM
1,4-Dichlorobenzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
2-Butanone	ND		200	µg/L	20	8/15/2007 1:40:00 PM
Benzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Carbon tetrachloride	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Chlorobenzene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Chloroform	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Tetrachloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Trichloroethene	ND		100	µg/L	20	8/15/2007 1:40:00 PM
Vinyl chloride	ND		100	µg/L	20	8/15/2007 1:40:00 PM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc.

Date: *August 16, 2007*

CLIENT: Navajo Refining Company
Work Order: 0708282
Project: DAF Disposal
Lab ID: 0708282-01

Client Sample ID: DAF
Collection Date: 8/13/2007 3:00:00 PM
Matrix: SOIL

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
Surr: 1,2-Dichloroethane-d4	*102*		*70-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: 4-Bromofluorobenzene	*105*		*72-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: Dibromofluoromethane	*103*		*71-125*	*%REC*	20	8/15/2007 1:40:00 PM
Surr: Toluene-d8	*106*		*75-125*	*%REC*	20	8/15/2007 1:40:00 PM
CYANIDE, REACTIVE			**SW-846**			Analyst: **MAG**
Reactive Cyanide	ND		40.0	mg/Kg	1	8/13/2007
SULFIDE, REACTIVE			**SW-846**			Analyst: **MAG**
Reactive Sulfide	ND		40.0	mg/Kg	1	8/13/2007
IGNITABILITY FOR SOLIDS			**SW846, CHPT. 7.1.2**			Analyst: **RPM**
Burns vigorously and persistently	No				1	8/15/2007
Ignites spontaneously	No				1	8/15/2007
Ignites through friction	No				1	8/15/2007
Ignites under std. temp and pressure	No				1	8/15/2007
Ignites with moisture	No				1	8/15/2007
PH IN SOLID			**SW9045B**			Analyst: **TH**
pH	7.19		0.100	pH Units	1	8/15/2007

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc.
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page ____ of ____

The Chain of Custody is a Legal Document. All information must be completed accurately.

e-Lab Analytical, Inc.
3352 128th Avenue
Holland, Michigan 49424
(Tel) 616.399.6070
(Fax) 616.399.6185

e-Lab Project Manager: e-Lab Work Order #: 0708282

Customer Information		Project Information		Parameter/Method Request for Analysis	
A Purchase Order		Project Name	DAF Disposal	A	TCLP VOA
B Work Order		Project Number		B	" Semi VOA
C Company Name	Navajo	Bill To Company		C	" Metals
D Send Report To	J. Byrd	Invoice Attn		D	RCI
E Address		Address		E	
F City/State/Zip		City/State/Zip		F	
G Phone		Phone		G	
H Fax		Fax		H	
I e-Mail Address		e-Mail Address		I	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	DAF	8/13/07	1500	S	9	1	X	X	X	X							
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: [signature]

Shipment Method: Fed Ex

Required Turnaround Time: (Check Box) ☐ STD-10 Wk Days ☐ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour ☐ Other

Results Due Date: 8/16/07

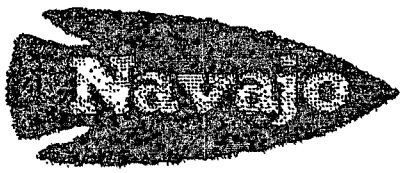
Relinquished by: [signature]	Date: 8/13/07	Time: 1615	Received by:	Notes: Need Complete Report	
Relinquished by:	Date:	Time:	Received by (Laboratory): [signature] 8/14/07 0900	e-Lab Analytical Cooler ID	Trip Blank Number
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):		

QC Package: (Check One Box Below)
☐ Level II Std QC ☐ TRRP Checklist
☐ Level III Std QC/Raw Data ☐ TRRP Level IV
☐ Level IV SW846/CLP
☐ Other

Preservative Key: 1-HCl 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to e-Lab Analytical, Inc.
2. Unless otherwise agreed in a formal contract, services provided by e-Lab Analytical, Inc. are expressly limited to the terms and conditions stated on the reverse.

ENVIRONMENTAL DEPARTMENT
PHONE: (505) 748-6733
FAX: (505) 746-5451



NAVAJO REFINING COMPANY
P.O. BOX 159
501 E. MAIN STREET
ARTESIA, NEW MEXICO 88210

SENDING TO: **NAME: Jim Wilson**

COMPANY NAME: Artesia Aeration

FAX: 505-3923085

SENDING FROM: **NAME: Darrell Moore**

DATE: 8/17/07

NO. OF PAGES: 6
(Including cover page)

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL CARRIE AT THE NUMBER ABOVE.
Waste Status non-exempt waste material.

COMMENTS:

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL

COMPANY / GENERATOR: Navajo Refining

ADDRESS: 501 E Main Artesia NM 88211

GENERATING SITE: Artesia Plant

COUNTY Eddy STATE NM

TYPE OF WASTE: Dissolved Air Float

ESTIMATED VOLUME: 80 cy/week

GENERATING PROCESS: Petroleum Refining

REMARKS:

NMOCD FACILITY: Artesia Aeration

TRUCKING COMPANY: S Brothers

As a condition of acceptance for disposal, I hereby certify that this waste is A non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Sections 2613.

AGENT: Darrell Moore
SIGNATURE

NAME: Darrell Moore
PRINTED

ADDRESS: P.O. Box 159 Artesia NM 88211

DATE: 8/17/07

NON-HAZARDOUS WASTE MANIFEST	1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of	

GENERATOR

3. Generator s Name and Mailing Address

Nº 8757

4. Generator s Phone ( ) Navajo

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
5 Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. **MALJAMAR, NM**		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF				
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Chris Murray		01	19	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

Non HAZ

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1	
NMD048918817			

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refinigg Co. LLC
PO Box 159
Artesia, NM 88211-0159

№ 8722

4. Generator s Phone (575) 748-3311

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez			

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Chris Murray		01	21	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.: NMD048918817
Manifest Doc. No.:
2. Page 1 of 1

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

No 8723

4. Generator s Phone (575) 748-3311

5. Transporter 1 Company Name: S Brothers
6. US EPA ID Number:
A. Transporter s Phone:

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter s Phone:

9. Designated Facility Name and Site Address
ARTESIA AERATION, L.L.C.
MALJAMAR, NM
10. US EPA ID Number:
C. Facility s Phone:

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b. CELL 4				
c.				
d.				

D. Additional Descriptions for Materials listed Above

E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** *I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.*

Printed/Typed Name: Carrie Hernandez
Signature: Carrie Hernandez
Month: 1 Day: 21 Year: 08

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: RAYMOND GIBSON
Signature:
Month: 1 Day: 21 Year: 08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name:
Signature:
Month: Day: Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name:
Signature:
Month: Day: Year:

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
NMD048918817		

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575 748-3311)

№ 8724

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez			

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Chris Murray		01	22	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
NMD048918817		

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

No 8733

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Carrie Hernandez	Carrie Hernandez			

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Chris Murray		10	22	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.: NMD048918817
Manifest Doc. No.:
2. Page 1 of 1

No 8732

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

5. Transporter 1 Company Name: S Brothers
6. US EPA ID Number:
A. Transporter s Phone:

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter s Phone:

9. Designated Facility Name and Site Address
ARTESIA AERATION, L.L.C.
MALJAMAR, NM
10. US EPA ID Number:
C. Facility s Phone:

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above

E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Carrie Hernandez
Signature: Carrie Hernandez
Month / Day / Year:

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Chris Murray
Signature:
Month / Day / Year: 01 / 23 / 08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name:
Signature:
Month / Day / Year:

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name:
Signature:
Month / Day / Year:

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.: NMD048918817
Manifest Doc. No.:
2. Page 1 of 1

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

№ 8731

5. Transporter 1 Company Name: S Brothers
6. US EPA ID Number:
A. Transporter s Phone:

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter s Phone:

9. Designated Facility Name and Site Address
ARTESIA AERATION, L.L.C.
MALJAMAR, NM
10. US EPA ID Number:
C. Facility s Phone:

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above:

E. Handling Codes For Wastes Listed Above:

15. Special Handling Instructions and Additional Information:

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Carrie Hernandez
Signature: Carrie Hernandez
Month: Day: Year:

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Chris Murray
Signature:
Month: 01 Day: 23 Year: 08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name:
Signature:
Month: Day: Year:

19. Discrepancy Indication Space:

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name:
Signature:
Month: Day: Year:

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
NMD048918817		

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

№ 8713

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Contaminated Soil DAF			10 yds	
b.				
c.				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions,and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
CARRIE HERNANDEZ	Carrie Hernandez	1	28	08

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
RAYMOND WILSON		1	28	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
NMD048918817		

GENERATOR

3. Generator s Name and Mailing Address
Navajo Refining Co. LLC
PO Box 159
Artesia, NM 88211-0159

4. Generator s Phone (575) 748-3311

No 8711

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter s Phone
S Brothers		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter s Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility s Phone
ARTESIA AERATION, L.L.C. MALJAMAR, NM		

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. ~~Non-Hazardous Solid~~ DAF			10 yds	
b. CELL #4				
c. NPFL				
d.				

D. Additional Descriptions for Materials listed Above	E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
CARRIE HERNANDEZ	Carrie Hernandez	1	28	08

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
DAYMON WBOX	David W Box	1	28	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

NON-HAZARDOUS WASTE MANIFEST

1. Generator s US EPA ID No. | Manifest Doc. No. | 2. Page 1 of

GENERATOR

3. Generator s Name and Mailing Address
NAVAJO
ARTESIA NEW MEXICO PO BOX 159

№ 8798

4. Generator s Phone (575) 748 - 3311

5. Transporter 1 Company Name
SIBROTA-FRS

6. US EPA ID Number

A. Transporter s Phone

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter s Phone

9. Designated Facility Name and Site Address
ARTESIA AERATION, L.L.C.
MALJAMAR, NM

10. US EPA ID Number

C. Facility s Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. DAF CAP			10 YDS	
b. NPFL				
c. CELL 4				
d.				

D. Additional Descriptions for Materials listed Above

E. Handling Codes For Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
		1	30	08

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
DARMAN 1304		1	30	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of wasted material covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

Jones, Brad A., EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, February 08, 2008 2:54 PM
To: Moore, Darrell; Jim Wilson
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Possible improper waste disposal

Thank you Darrell.

From: Moore, Darrell [mailto:Darrell.Moore@hollycorp.com]
Sent: Friday, February 08, 2008 2:29 PM
To: Price, Wayne, EMNRD; Jim Wilson
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Possible improper waste disposal

Wayne,

Navajo stopped the shipment of Dissolved Air Flotation (DAF) to Artesia Aeration as soon as you called me Wednesday. It is my understanding after discussions with Jim Wilson at Artesia Aeration that the material has been isolated and we will send trucks to the landfarm to pick it up and dispose of it at Controlled Recovery, Inc. We will complete that next week.

Attached to this email are the following:

1) Paperwork, non-hazardous waste manifests, and sample analysis that we sent to Artesia Aeration to get this material approved. We were given a verbal approval from Artesia Aeration to send the waste.

2) Approved C-138 from Controlled Recovery, Inc. dated August 20, 2007 to dispose of DAF.

As I mentioned on the phone, we have only sent this waste to Artesia Aeration since January 14, 2008 a total of 8 loads to our knowledge. The reason I say that is that our secretary is out recovering from surgery and we searched the files and found 8 manifests. I don't believe there are any more. If we find any new manifests we will forward those to you.

If there are any further questions concerning this matter, please don't hesitate to call me at 575-746-5281.

From: Price, Wayne, EMNRD [mailto:wayne.price@state.nm.us]
Sent: Wednesday, February 06, 2008 11:36 AM
To: Jim Wilson; Moore, Darrell
Cc: Jones, Brad A., EMNRD; Williams, Chris, EMNRD; Gum, Tim, EMNRD; Cobrain, Dave, NMENV; Chavez, Carl J, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: Possible improper waste disposal

Dear Mr. Wilson:

It has come to OCD's attention that possible RCRA listed DAF (dissolved air floatation waste normally know as K-048) waste

generated at the Navajo Artesia Refinery has been disposed of at the Artesia Aeration land farm OCD permit # NM1-30. Please be aware your permit or the regulations do not allow such waste to be disposed of at your facility. You are hereby ordered to stop receiving such waste and perform the following actions:

1. Provide all paperwork, manifest, sample analysis concerning the waste in question to Mr. Brad Jones who will be on site tomorrow morning.
2. Also make arrangements so Mr. Jones may inspect all records during his inspection.
3. Isolate the waste in question until a final determination has been made by this agency for proper disposal.

Dear Mr. Moore:

Pursuant to our telephone conversation this morning you are hereby directed to stop disposing of the DAF waste generated at the Navajo Artesia Refinery at the Artesia Aeration landfarm OCD permit #NM1-30. You indicated this material is predominately dirt, scale, rust and is virtually oil free after it has gone thru the treatment process. You also indicated it is has been deemed non-hazardous. Please note landfarms are for remediating soils that have been contaminated with oilfield hydrocarbons. Since you indicated this material has already gone thru treatment it cannot be disposed of in the landfarm but must go to an OCD permitted landfill or another approved facility. You are hereby ordered to stop sending such waste to Artesia Aeration and perform the following actions today:

1. Provide a copy to this office of all of the paperwork, manifests, sample analysis, waste determinations concerning the waste in question.
2. Provide a copy or point out in your current discharge plan where this waste is approved to be disposed of.
3. Provide this agency a plan for approval to pick-up and properly dispose of the waste in question.

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462