

**GW - 158**

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**INSPECTIONS &  
DATA**

## **Lowe, Leonard, EMNRD**

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**From:** Clay Courville EDI [clay.c@edienvrionmental.com]  
**Sent:** Wednesday, June 13, 2012 10:31 AM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Randy Eitel; Mickey Broussard  
**Subject:** Re: GW-158, Knight Oil Tools - Farmington  
**Attachments:** Manifest Profile.pdf; 060612 Cont Area.jpg; 060612 New Compressors.jpg; 060612 Outside Wash Bay.jpg

Mr. Lowe,

Please find each of the explanations which follow your highlighted items from a previous email. I will send a hard copy on letterhead ASAP.

**16. OCD Inspections:** The OCD performed an inspected this facility on November 20, 2008. Randy Eitel and Brandon Powell were in attendance. All photographs referenced below are located in the attachment of this permit. The OCD concluded the following:

1. **Photo 1:** Does this identified below grade tank in the wash bay area have a secondary containment? i.e. a tank within a tank? How often is this tank full of fluids?

**The sump in the wash rack area measures 30" deep x 40" x 40" = 155 gallons. It is kept dry by a sump pump which transfers to water to the recycling system.**

2. **Photo 2:** the saddle tank needs to be reconfigured so that the outlet portion of the tank (hose) is within a containment area. If the valve were to fail there would be a direct discharge on to the ground. Knight shall reconfigure tank.

**The tank was pushed back within the containment area.**

3. **Photo 3:** Bung missing on barrel. See condition 7 for details on barrel/drum storage.

**Bungs replaced and observed secure during all site walkthrough inspections.**

4. **Photo 4 - 6:** The agency has observed several containers holding what is believed to be containment soil and "waste". Waste should not be kept onsite no longer than 180 days unless approved by the OCD. See condition 6. B, for details. Properly remove and dispose of waste within the prescribe time frame.

**Misc. stains area remediated throughout the yard periodically. The drums in question were disposed of (manifest and profile attached). An active profile is kept up to date for future disposal events. Nothing is kept beyond the 180 day limit.**

5. **Photo 7:** All barrels should be properly stored. See condition 7. Reconfigure all barrels.

**Drums are properly stored.**

6. **Photo 8:** There appears to be some staining directly outside the wash bay building. Knight shall investigate this staining and report any findings to the OCD.

**The staining has been remediated and the block wall within the wash bay resealed to prevent future fluids from escaping.**

7. **Photo 9– 10:** the secondary containment for this trailer has idle fluids and appears to have breached its integrity. Knight shall ensure that all containments are able to be suitable containers. As soon as a breached it identified immediate action is needed to resolve the situation and stop the discharge on to the ground. **This unaddressed leaking containment is a violation of the discharge permit.** Knight shall remove these fluids within a 72-hour period (see condition 11.A) and clean up the contaminated soil.

**The stains were remediated, the compressor and drip pan configuration was replaced by new compressor systems with built in containment.**

8. **Photo 11:** The agency strongly encourages Knight Oil Tooling to ensure that all waste containers or containers in general are properly disposed of.

**All waste streams are properly disposed and tracked by manifest and/or bills of lading.**

Please let me know if you have any questions.

Thanks,

Clay

eDi Environmental Services, Inc.  
148-C Easy St., Lafayette, LA 70506  
(o) 337/264-9810  
(f) 337/264-9816  
(m) 337/962-5895





# Bill of Lading

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

MANIFEST # 56056

DATE 7-9-10 JOB# 09151-0002

| LOAD NO. | COMPLETE DESCRIPTION OF SHIPMENT   |             |                |      |     |      | TRANSPORTING COMPANY |      |      |                  |
|----------|------------------------------------|-------------|----------------|------|-----|------|----------------------|------|------|------------------|
|          | POINT OF ORIGIN                    | DESTINATION | MATERIAL       | GRID | YDS | BBLs | COMPANY              | TRK# | TIME | DRIVER SIGNATURE |
| 1        | Robinson Fueler<br>night oil tools | LFTI-5      | CON. &<br>SOIL | K-16 | -   | 12   | E-tech               | 937  | 1236 | Bob Carter       |
|          |                                    | Robinson    |                |      |     | (12) |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |
|          |                                    |             |                |      |     |      |                      |      |      |                  |

|          |                   |   |
|----------|-------------------|---|
| RESULTS: |                   |   |
| 1294     | CHLORIDE TEST     | 1 |
|          | PAINT FILTER TEST | 1 |

LANDFARM EMPLOYEE: Gary Robinson  
*GYP*

NOTES: ENTERED JUL 14 2010

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Bob Carter COMPANY Envirotech SIGNATURE Bob Carter  
 COMPANY CONTACT Envirotech Inc PHONE 505-320-2885 DATE 7-9-10



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

Form C-138  
Revised March 12, 2007

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

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

**REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE**

|   |
|---|
| <b>1. Generator Name and Address:</b><br>Knight Oil Tools 5790 U.S. Hwy 64, Farmington NM 87401   |
| <b>2. Originating Site:</b><br>Knight Oil Tools 5790 U.S. Hwy 64, Farmington NM 87401   |
| <b>3. Location of Material (Street Address, City, State or ULSTR):</b><br>Knight Oil Tools 5790 U.S. Hwy 64, Farmington NM 87401  |
| <b>4. Source and Description of Waste:</b><br>Soil contaminated with various hydrocarbons from doing general yard cleanup. Materials include hydraulic oil and various used fluids from vehicles and equipment. TPH, TCLP level for lead were performed in addition to RCRA 8 testing.<br><br>Envirotech Inc is authorized to sign the Generator Waste Testing Certification.<br>Estimated Volume 27 yd <sup>3</sup> / bbls Known Volume (to be entered by the operator at the end of the haul) _____ yd <sup>3</sup> / bbls  |
| <b>5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS</b><br>I, <u>Randy Eitel</u> representative or authorized agent for <u>Knight Oil Tools</u> 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)<br><br><input type="checkbox"/> RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. <del>Operator Use Only Waste Acceptance Frequency</del> <input type="checkbox"/> Monthly <input type="checkbox"/> Weekly <input type="checkbox"/> Per load<br><input checked="" type="checkbox"/> 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)<br><input type="checkbox"/> MSDS Information <input checked="" type="checkbox"/> RCRA Hazardous Waste Analysis <input type="checkbox"/> Process Knowledge <input checked="" type="checkbox"/> Other (Provide description in Box 4) |
| <b>GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS</b><br>I, _____, representative for <u>Envirotech Inc</u> 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.  |
| <b>5. Transporter: Envirotech Inc.</b>  |

**OCD Permitted Surface Waste Management Facility**

Name and Facility Permit #: Envirotech Inc. Soil Remediation Facility Permit # NM-01-0011

Address of Facility: Hilltop, New Mexico

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: April E Pohl TITLE: Land Farm Administrator DATE: 12-16-09

SIGNATURE: \_\_\_\_\_ TELEPHONE NO.: 505-632-0615

Surface Waste Management Facility Authorized Agent





E-mail Attachment 060612 New Compressors



Email Attachment 060612 outside Wash bay



RECEIVED  
2009 OCT -5 P 1:48  
148-C Easy Street, Lafayette, Louisiana 70506  
Post Office Box 60726, Lafayette, Louisiana 70596-0726  
Phone: (337) 264-9810 Fax: (337) 264-9816

September 28, 2009

Mr. Leonard Lowe  
State of New Mexico  
Energy Minerals and Natural Resources  
OCD – Environmental Bureau  
1220 South St. Francis Dr.  
Sante Fe, NM 87505

**Re:** Knight Oil Tools (GW-158)  
Farmington, San Juan County, NM  
Discharge Permit – Renewal Conditions

Dear Mr. Lowe:

EDI Environmental Services, Inc. (EDI) on behalf of Knight Oil Tools (Knight) is pleased to provide the following responses to the *Discharge Plan Renewal Conditions*, which were noted in the May 4<sup>th</sup>, 2009 correspondence received.

EDI was on-site Friday September 25<sup>th</sup>, 2009 to document the below noted site conditions versus the findings of your inspection. Please review the following comparative Photo Log and explanation.

**NMOCD May 4<sup>th</sup>, 2009 letter Section 16. #1: Photo 1 - Wash Bay**



Photo Date: 09/25/09

**Response:**

As apparent the Wash Bay remains in the same configuration as before. It does not possess secondary containment. It does not remain full of fluids at any given time as wash waters which enter the sump are conveyed to a closed-loop recycling system.



**Wash Bay system at the Knight Oil Tools OK City Facility**

**Response to Sec. 16. #1 continued:**

As depicted in the above photo, Knight intends to utilize this system type at the Farmington facility thereby eliminating the "Below Grade Tank". Wash waters in the above system simply drain through the false floor and are conveyed to the same closed loop system as before.

EDI will provide a schematic of the system upon receipt. A "Closure Plan" for the sump / below grade tank will be submitted for prior approval.

**Section 16 #2: Photo 2 – Saddle Tank placement**



**Fuel Tank in Secondary Containment 09/25/09**

As shown in the above photo the saddle tank was repositioned as to contain the valve and nozzle fittings so possible leaks or failures would remain within containment.

**Section 16 #3: Photo 3 – Missing Bung**



**Drums within Containment 09/25/09**

All drums inspected on the noted date possessed secured bungs. Open drums were observed but were actively in use. Upon activity completion the drums all secured with tops and rings and / or bungs.

**Section 16. #4: Photo 4 – 6: Soil Drums on-site**

As discussed the soil drums were generated from misc. yard remediations of hydrocarbon stains behind the wash bay building and under the former compressor containment pan. A composite sample of the waste material is currently under profile analysis. Once completed EDI will provide manifest of disposal for the noted soil drums.

**Section 16. #5: Photo 7 – Drum storage / waste containers on pallet**

All empty waste containers and drums have been properly disposed.

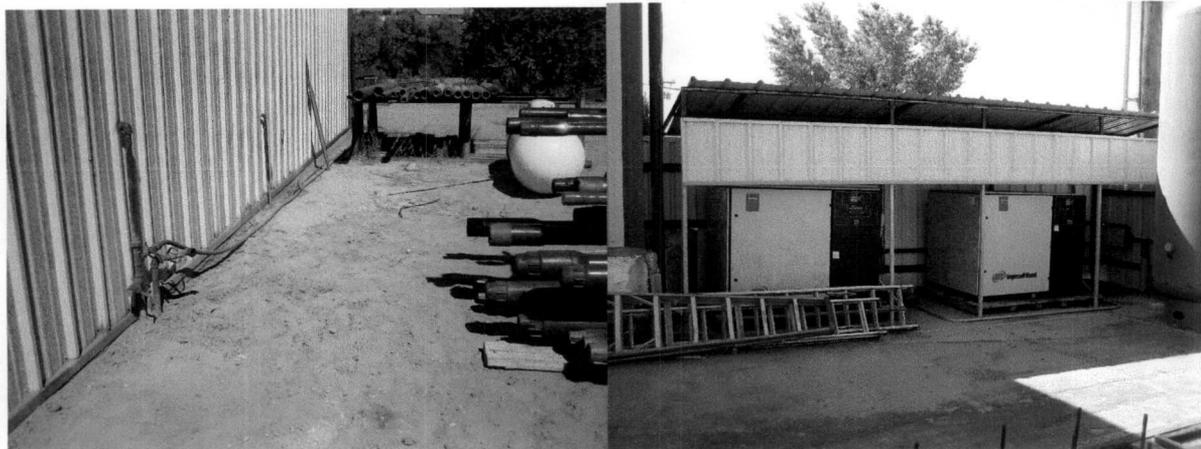
**Section 16 #6: Photo 8 – Staining outside wash bay building**



**Area behind wash bay building; 09/25/09**

As noted in the photo, the stained soils have been removed and replaced with clean fills. Removed soils were placed in drums and are awaiting profile approval.

**Section 16. #7: Photo 9 - 10 – Former compressor containment**



**Former Compressor area; 09/25/09**

**New compressors; 09/25/09**

The above photos provide visual confirmation that the former compressor area was remediated and the soils drummed for disposal. The new compressor area lay adjacent to the main shop building on a cement slab. Each unit possesses its own internal secondary containment.

**Section 16 #8: Photo 11 – Debris**

Housekeeping throughout the yard on the inspection date, 09/25/09, appeared in order. The noted debris from the NMOCD inspection has been disposed and / or recycled.

Please note the Knight will make every effort to comply with Discharge Permit GW-158. EDI will provide follow-up documentation including waste manifests and wash bay schematics as they become available.

If you have any questions or require amendments, please contact our office at (337) 264-9810.

Sincerely,  
**EDI Environmental Services, Inc.**

A handwritten signature in black ink, appearing to read 'Clayton Courville'.

Clayton Courville, RSO  
President

cc: Mr. Randy Eitel, Knight - Farmington  
Mr. Mickey Broussard, Knight Corporate – Sr. Vice President Operations

148-C Easy Street, Lafayette, Louisiana 70506  
Post Office Box 60726, Lafayette, Louisiana 70596-0726  
Phone: (337) 264-9810 Fax: (337) 264-9816

September 28, 2009

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State of New Mexico  
Energy Minerals and Natural Resources  
OCD – Environmental Bureau  
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Sante Fe, NM 87505

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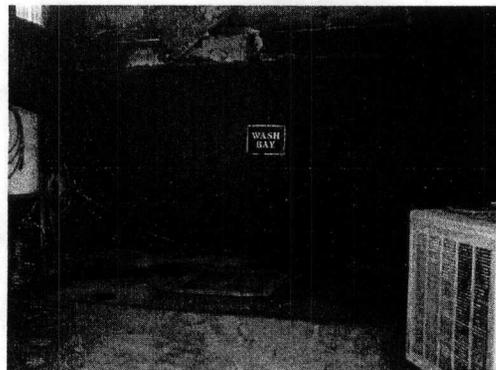


Photo Date: 09/25/09

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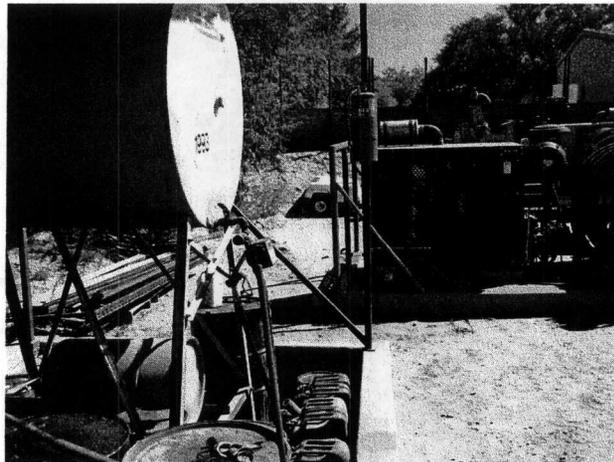
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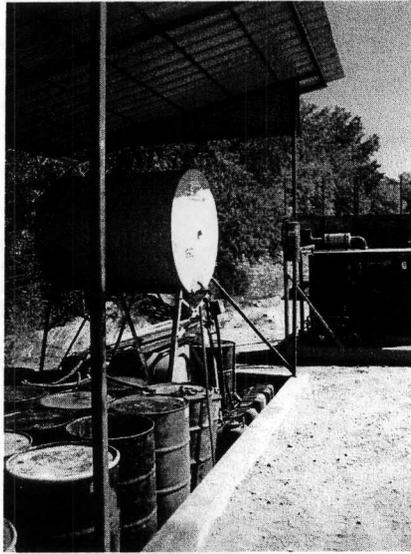
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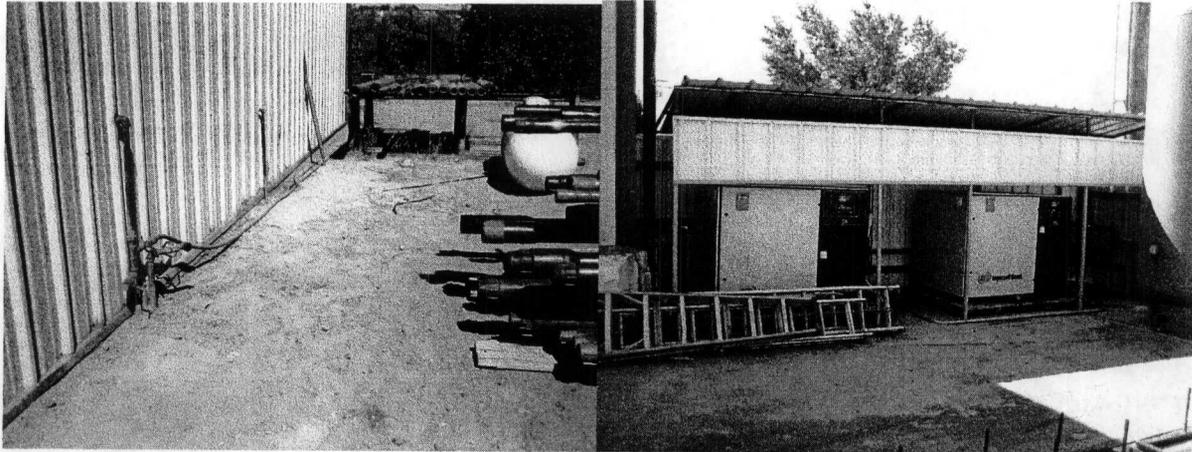
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Please note the Knight will make every effort to comply with Discharge Permit GW-158. EDI will provide follow-up documentation including waste manifests and wash bay schematics as they become available.

If you have any questions or require amendments, please contact our office at (337) 264-9810.

Sincerely,  
**EDI Environmental Services, Inc.**



Clayton Courville, RSO  
President

cc: Mr. Randy Eitel, Knight - Farmington  
Mr. Mickey Broussard, Knight Corporate – Sr. Vice President Operations

Inspection was conducted during renewal period and noted in Condition 16. Photographs are attached to the Permit under the Permit Thumbnail.

**16. OCD Inspections:** The OCD performed an inspected this facility on November 20, 2008. Randy Eitel and Brandon Powell were in attendance. All photographs referenced below are located in the attachment of this permit. The OCD concluded the following:

1. **Photo 1:** Does this identified below grade tank in the wash bay area have a secondary containment? i.e. a tank within a tank? How often is this tank full of fluids? Respond with details.
2. **Photo 2:** the saddle tank needs to be reconfigured so that the outlet portion of the tank (hose) is within a containment area. If the valve were to fail there would be a direct discharge on to the ground. Knight shall reconfigure tank.
3. **Photo 3:** Bung missing on barrel. See condition 7 for details on barrel/drum storage.
4. **Photo 4 - 6:** The agency has observed several containers holding what is believed to be containment soil and "waste". Waste should not be kept onsite no longer than 180 days unless approved by the OCD. See condition 6. B, for details. Properly remove and dispose of waste within the prescribe time frame.
5. **Photo 7:** All barrels should be properly stored. See condition 7. Reconfigure all barrels.
6. **Photo 8:** There appears to be some staining directly outside the wash bay building. Knight shall investigate this staining and report any findings to the OCD.
7. **Photo 9 - 10:** the secondary containment for this trailer has idle fluids and appears to have breached its integrity. Knight shall ensure that all containments are able to be suitable containers. As soon as a breached it identified immediate action is needed to resolve the situation and stop the discharge on to the ground. **This unaddressed leaking containment is a violation of the discharge permit.** Knight shall remove these fluids within a 72 hour period (see condition 11.A) and clean up the contaminated soil.
8. **Photo 11:** The agency strongly encourages Knight Oil Tooling to ensure that all waste containers or containers in general are properly disposed of.

The OCD Environmental Bureau concludes that the Knight Farmington facility is in overall good condition. The above stated concerns shall be addressed within a report and submitted to the OCD within **30 days, by June 5, 2009**. The report shall include resolutions and answers to the above list. The probability of contaminating ground and surface waters in this area is of great concern with a wetland adjacent and directly north of the facility and with ground water within 3 feet.

Knight Oil Tool's management shall inform its employees of the permit conditions **within 30 days** of signed permit. A copy of the permit shall be kept onsite at all times.

# OCD ENVIRONMENTAL BUREAU

## SITE INSPECTION SHEET

DATE: 6/28/01 Time: 3:40 PM

Type of Facility: Refinery  Gas Plant  Compressor St.  Brine St.  Oilfield Service Co.   
Surface Waste Mgt. Facility  E&P Site  Crude Oil Pump Station   
Other  \_\_\_\_\_

Discharge Plan: No  Yes  DP# 158

FACILITY NAME: FARMINGTON YARD

PHYSICAL LOCATION: 5970 Hwy 64 - FARMINGTON

Legal: QTR  QTR  Sec  TS  R  County SAN JUAN

OWNER/OPERATOR (NAME) KNIGHT OIL TOOLS

Contact Person: DON ROGERS Tele:# 505-632-6666

### MAILING

ADDRESS: \_\_\_\_\_ State NM ZIP 87401

Owner/Operator Rep's: \_\_\_\_\_

OCD INSPECTORS: W PRICE, E MARTIN

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

\_\_\_\_\_

2. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

Pic # 3 YARD - LOOKING EAST

Pic # 4 YARD - " SW

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

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

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

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

PIC # 2 WASH BAY SUMP - OIL FIELD TOOLS (SINGLE WALL SUMP)

TOTAL RE-CYCLE SYSTEM

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

ONE LINE BETWEEN SUMP & RE-CYCLE SYSTEM

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

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

SUMP WASTE SLOUSE → SAFETY CLEAN - ALBA.

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

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

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

GOOD

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

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

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

NONE

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

Miscellaneous Comments:

Number of Photos taken at this site: 4  
attachments-



Pic #1 Sign



Pic #4 East side of yard looking west.



Pic #2 Tool wash bay area with single wall sump connected to water re-cycle system. Sump waste is disposed of by Safety Clean (Albq).



Pic #3 Far West side of yard looking east