GW - 192

INSPECTIONS & DATA

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, October 14, 2008 4:41 PM
To: 'st.mci@plateautel.net'
Cc: Jones, Brad A., EMNRD; Johnson, Larry, EMNRD
Subject: GW-192 MCI Hobbs, Inspection Letter
Attachments: GW-192, Inspection Letter.pdf; GW-192 , Inspection Photo Sheet.pdf

Mr. Steve Tigert,

Please address the items noted in the attached inspection letter pertaining to your MCI Hobbs facility.

Mr. Brad Jones, of the Santa Fe, Environmental Bureau office is the current permit holder.

If you have any questions please feel free to contact me.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

New Mexico Energy, Minerals and Natural Resources Department

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

Mark Fesmire
Division Director
Oil Conservation Division

October 14, 2008

Mr. Steve Tigert
P.O. Box 298
Artesia, New Mexico 88211-0298

Re: Inspection Report, GW-192
MCI Miller Chemicals Inc.
Lea County, New Mexico

The Oil Conservation Division (OCD) performed an onsite inspection of MCI Chemical and Consulting located in Section 21, Township 18 South, Range 38 East, NMPM, Lea County, Hobbs New Mexico on May 15 2008. Mr. U.J. Garcia Jr. provided access and tour of the facility.

The facility was previously inspected by OCD on June 17, 1999. MCI's current permit expires on June 29, 2010.

MCI shall address the following concerns (reference photos in attached inspection photo sheet). **The majority of the containers and barrels onsite are not properly placed and located**. The permit conditions noted below were not followed.

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

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

Please reconfigure all tanks and containers accordingly. OCD request that MCI review their current discharge plan permit to ensure that all conditions are adhered to. As of this inspection the OCD Environmental Bureau has noted MCI to be in violation of their discharge permit. **MCI shall submit a report, with photos, to the OCD Environmental Bureau office within 60 days from this inspection letter date, by December 13, 2008 to correct these violations.**

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe
Environmental Engineer

xc: OCD District I Office, Hobbs

OCD Inspection: MCI GW - 192

Inspectors: Leonard Lowe

Company Rep: Mr. U.L. Garcia Jr., Hobbs Area Manager

Date: 05.15.08 Time: 9:50 – 10:30

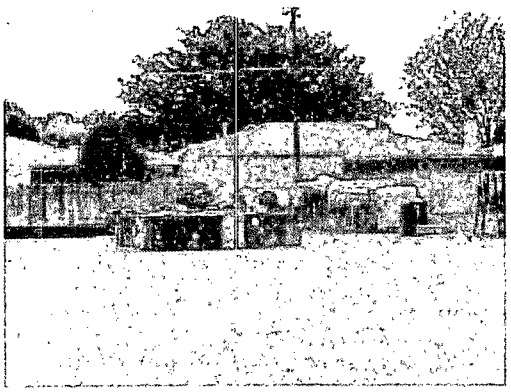


Photo 1: Full barrels located on ground in yard.

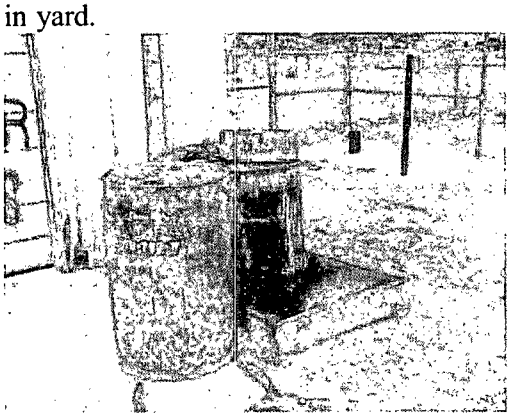


Photo 2: Used oil bin area.

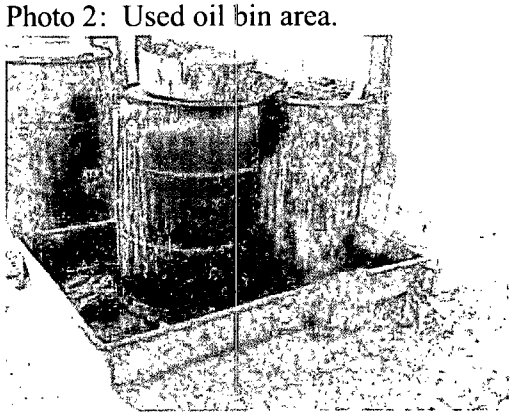


Photo 3: Used oil bin area. Over flow and fluids discharged on to ground.

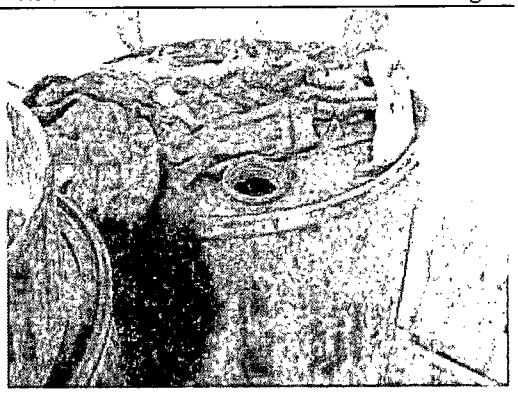


Photo 4: No bung in barrel in used oil area.

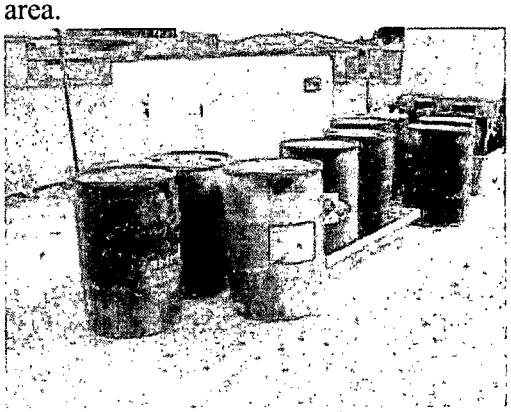


Photo 5: A few barrels located on the ground.

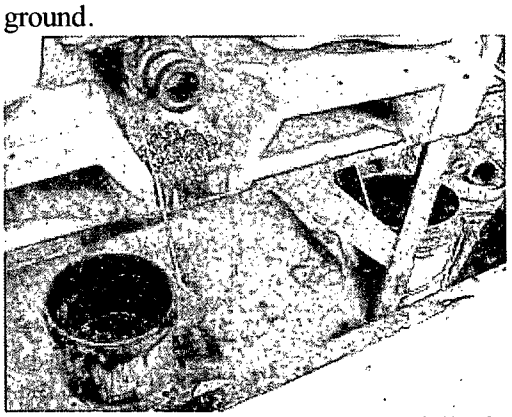


Photo 6: Secondary containment full of liquids and debris.

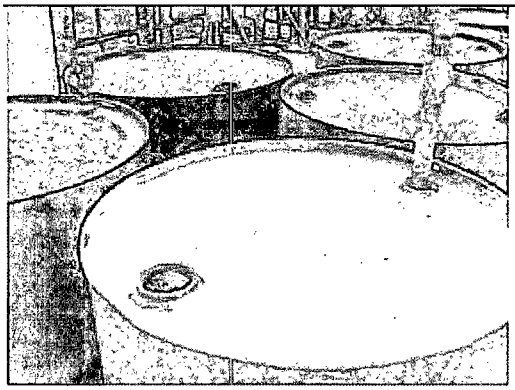


Photo 7: Bung missing on barrel.

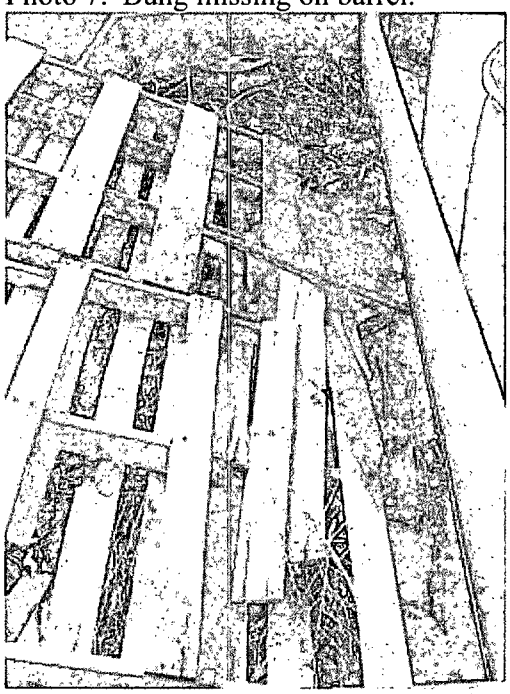


Photo 8: Secondary containment, not in use, full of debris and fluids.

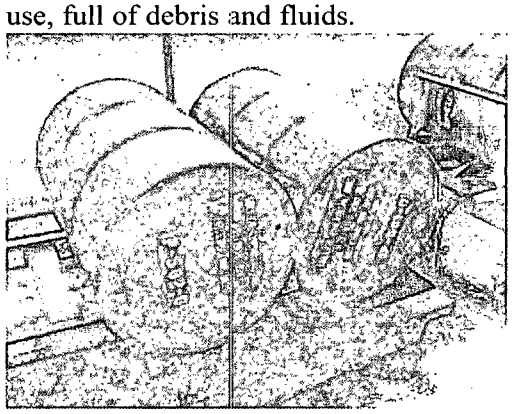


Photo 9: Empty barrel with missing bung.

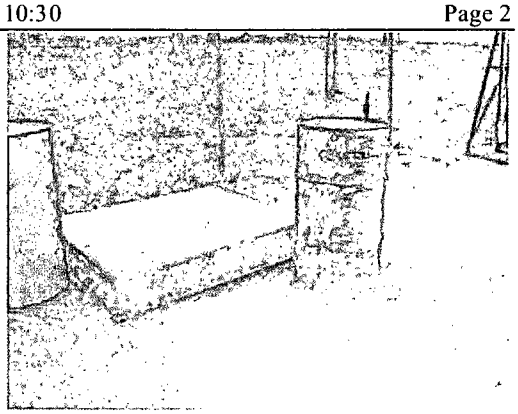


Photo 10: Barrel with leak discharge on to the ground.

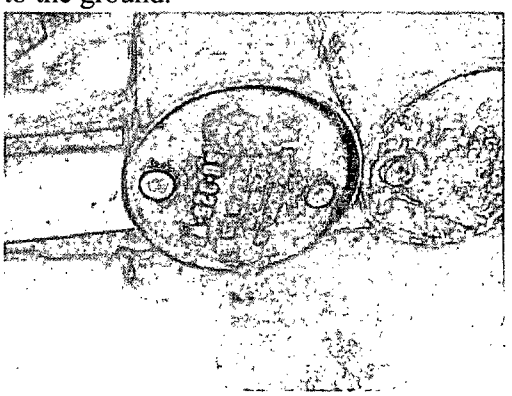


Photo 11: Empty barrel location with contaminated soil.

DISCHARGE PLAN SITE INSPECTION

FACILITY NAME: Enviro-Chem (MCI) LOCATION: Hobbs

Ken Bromley - owner Noble Mud

(Tretolite)

DATE: 6-17-99 OWNER: Ken Bromley - Andy Miller - 746-1919 365-4881 (Cell.)

OCD INSPECTORS: Wayne Price, Donna Williams, J.F.

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.

(Pic) - Storage on Steel Containment

Mixed drums - if waste dispose of - if unable label drums & have in inventory

Containment vessels need rainwater emptied

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.

Lab - drains into tank - disposal offsite unknown - need to find out

water lab - drum storage in warehouse neat + orderly (Pic)

(Pic) Blending done in vats contained in concrete containment

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.

N/A

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.

either in containment or empty

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

MSD - filed in office + drivers keep in truck

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.

Pit filled ~~Con~~ and covered with Concrete

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.

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

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.?

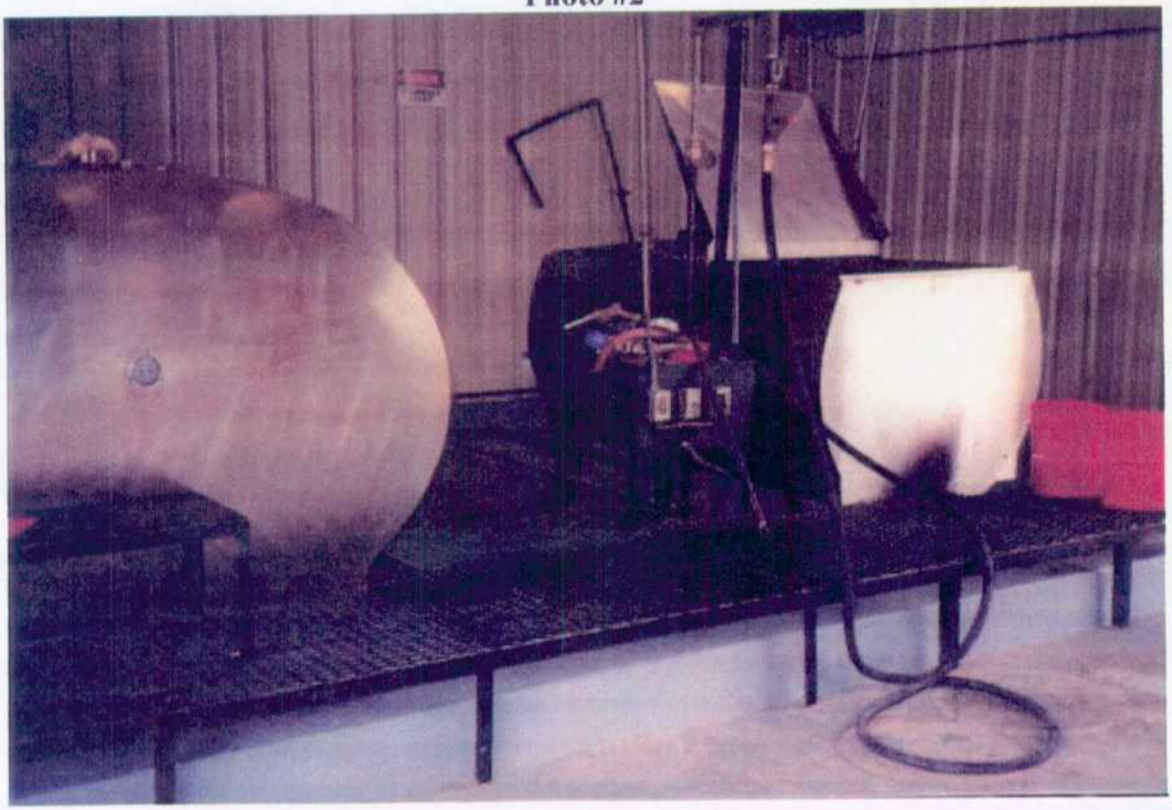
Number of Photos taken at this site: _____

Miscellaneous Comments: _____

Photo #1

GW-192 MCI HOBBS FACILITY
Building identifying sign

Photo #2



GW-192 MCI HOBBS FACILITY
Mixing vat

Photo #3

GW-192 MCI HOBBS FACILITY
Warehouse drum storage

Photo #4

GW-192 MCI HOBBS FACILITY
Outside drum storage within steel containment

Photo #5

GW-192 MCI HOBBS FACILITY
Racked and secured empty drum storage along west side of yard.

Photo #6

GW-192 MCI HOBBS FACILITY
Bulk chemical storage within concrete containment.


MCI
393-2893


MCI
393-2893


MCI
CHEMICALS and CONSULTING
393-2893


MCI
393-2893

CASE DEVELOPMENT INSPECTION

ENVIRO-CHEM
HOBBS, NEW MEXICO

INSPECTION REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Solid Waste
Washington, DC 20460

Work Assignment No.	:	R06032
EPA Region	:	6
Date Prepared	:	June 30, 1995
Contract No.	:	68-W4-0007
Prepared by	:	PRC Environmental Management, Inc.
Telephone No.	:	214/754-8765
EPA Work Assignment Manager	:	Mr. Greg Pashia
Telephone No.	:	214/665-2287

CONTENTS

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R06032 from the U.S. Environmental Protection Agency (EPA) under Resource Conservation and Recovery Act (RCRA) Enforcement, Permitting, and Assistance (REPA) Contract No. 68-W4-0007. Under this work assignment, PRC is assisting EPA in conducting unannounced compliance evaluation inspections and case development inspections (CDI) at various facilities in New Mexico. To accomplish this task, PRC (1) performed file reviews, (2) provided technical assistance to EPA in conducting unannounced on-site inspections, (3) collected samples of waste streams, if necessary, and (4) generated inspection reports to document inspection activities. The inspections were conducted in conjunction with the EPA Region 6 RCRA Enforcement Branch Pesticide Toxicity Characteristic Leaching Procedure (TCLP) Enforcement Initiative.

This report summarizes the CDI of the Enviro-Chem facility in Hobbs, Lea County, New Mexico. Section 2.0 provides background facility data; Section 3.0 describes inspection activities and waste management units; and Section 4.0 is a summary. Appendices A through F contain information compiled by PRC, and Attachments A and B contain PRC and Enviro-Chem analytical data summary sheets, respectively. All material referenced in this report is included in the appendices or attachments.

2.0 BACKGROUND

Enviro-Chem is located less than one block south of the intersection of West Marland Boulevard and Burk Street in Hobbs, New Mexico (Appendix A, Figure A-1). The facility blends and sells oil field production chemicals. The facility consists of an office complex located along the west side of Burk Street, and a chemical blending and storage facility located along the east side (Appendix B, Figure B-1). The company began operating about 4 years ago.

Following are the facility data:

- Facility Address—827 West Marland Boulevard
  Hobbs, NM 88240

- Telephone—(505) 393-1917
- EPA Identification Number—None

3.0 INSPECTION ACTIVITIES

On April 25, 1995, at 1410, EPA and PRC personnel arrived at the Enviro-Chem facility, unannounced, to conduct a CDI. The inspection focused on the chemical blending and storage facility along the east side of Burk Street. The purpose of the CDI was to (1) inspect the facility's waste management practices, (2) identify whether the facility was potentially managing hazardous waste, and, if necessary, (3) collect samples from specific waste streams to support potential enforcement actions.

Mr. Greg Pashia, the EPA enforcement officer, began the inspection by explaining the purpose of the visit and introducing the team members. The following personnel participated in the CDI:

- Gregory Pashia EPA
- Mark Butler PRC
- Jeff Ayers PRC
- Luis Vega PRC
- Lynette Collins PRC
- Ken Bromley Enviro-Chem
- Joe Lee Smith Enviro-Chem
- Jim Bullick Enviro-Chem

After the initial meeting, EPA and PRC personnel began the inspection by conducting a site reconnaissance. Appendices C and D contain photographs and inspection notes, respectively. The following subsections present specific information regarding facility processes and waste management units (and associated sampling activities, where applicable) identified during the inspection.

3.1 CHEMICAL STORAGE AND BLENDING WAREHOUSE

EPA and PRC personnel began the site reconnaissance at the chemical storage and blending warehouse (Appendix B, Figure B-1) (Appendix C, Photograph No. 2). Inside the warehouse, Enviro-Chem stored 55-gallon drums of various product chemicals, and blended chemicals in tanks for use in the drilling and production of oil wells. The chemical blending tanks were located at the southern end of the warehouse in an area that had secondary containment. A steel blending tank was used for solvent-based products, and a polyethylene tank was used for water-based products.

Spills from the product blending process were directed to a sump in the containment area (warehouse sump). The sump also collected wash-out from the blending tanks. Based on its current configuration, the blending tanks and lines must be washed out when the facility switches from a water-based product to a solvent-based product. Based on conversations with facility personnel, the sump mainly contained chemicals that were washed out of the blending tanks—such as (1) naphtha-based solvents, and (2) liquid wastes containing toluene, xylene, methanol, and isopropyl alcohol. The warehouse sump ultimately discharges to a larger sump (shop sump) located south of the warehouse. During the inspection, facility personnel stated that they planned to make physical changes to the blending process to (1) prevent the generation of wastes, and (2) enable them to reuse any material that was used to clean the tanks and lines.

3.2 ABOVEGROUND PRODUCT STORAGE TANKS

Enviro-Chem uses eight vertical aboveground storage tanks to store product chemicals that are used for blending (Appendix B, Figure B-1). Based on the tank markings, the eight tanks contained (1) naphtha, (2) isopropyl alcohol, (3) methanol, (4) lactol (contains toluene and xylene), (5) methanol, (6) ethylene glycol, (7) surfactant, and (8) a corrosion inhibitor. The tanks are located on a concrete pad having a drain sump and a concrete curb that is about 6 inches high. Rainwater and spillage accumulate in the drain sump and ultimately discharge to the shop sump.

3.3 SHOP SUMP

The shop sump is located south of the aboveground product storage tanks along the east fenceline (Appendix B, Figure B-1; Appendix C, Photograph No. 3). The concrete sump is 8 feet long, 8 feet wide, and 10 feet deep. Based on interviews with facility personnel, the warehouse sump in the chemical blending warehouse, and the drain sump next to the aboveground product storage tanks, discharge to the shop sump. Also, when Enviro-Chem brought product drums to the facility from the oil field, Enviro-Chem occasionally emptied the 2 to 3 gallons of residual product into the shop sump.

During the inspection, facility personnel stated that the chemical blending process would be physically modified to prevent the generation of waste. The liquid wastes from the blending process ultimately accumulate in the shop sump. During the inspection, the shop sump contained a dark liquid waste and had about 1 foot of freeboard. One 840-gallon tote tank was also filled with liquid wastes that were formerly stored in the shop sump. During the inspection, facility personnel stated that, to dispose of the liquid wastes in the shop sump and 840-gallon tote tank, they had contacted the New Mexico Environment Department a few days earlier to obtain an EPA identification number. Waste liquids have been accumulating in the sump for over 2 years. To date, none of the liquid wastes from the shop sump had been shipped off site.

During the CDI, PRC collected two grab samples of liquid waste (designated ENVIROCH-SUMP-01 and -02 [duplicate]) from the shop sump for the following analyses (Appendix C, Photograph No. 3): (1) total volatile organic compounds (VOC) (EPA Method 8240), (2) TCLP VOCs (EPA Methods 1311 and 8240), and (3) flash point (EPA Method 1010). During sampling, PRC did not observe a sludge phase at the base of the sump.

The analysis of sample ENVIROCH-SUMP-01 for total VOCs detected toluene, ethylbenzene, and xylene at concentrations of 329,500 (estimated); 480,500 (estimated); and 5 million micrograms per liter, respectively. The concentrations of these constituents in duplicate sample ENVIROCH-SUMP-02 were slightly less.

The analysis for TCLP VOCs detected only 2-butanone at a concentration that is less than the regulatory limit of 200 milligrams per liter. Toluene, ethylbenzene, and xylene—the constituents detected in the analysis for total VOAs—are not included in the analysis for TCLP VOCs.

The analysis of sample ENVIROCH-SUMP-01 for flash point indicated that the contents of the sump had a flash point of 100°F. Title 40 Code of Federal Regulations (40 CFR) Section 261.21 states that a solid waste exhibits the characteristic of ignitability if a representative sample of the waste has a flash point of less than 140°F.

Appendix E contains a copy of the chain-of-custody forms. Appendix F contains an estimate of the volume and weight of the liquid waste in the shop sump. Attachment A contains the PRC analytical data summary sheets. PRC delivered a complete analytical data package to EPA in June 1995 for data validation. Attachment B contains Enviro-Chem analytical data summary sheets for samples collected before the CDI.

3.4 DRUM AND TANK STORAGE AREA

The storage area south of the warehouse was used to manage containers of various sizes. Most of the containers in the storage area were 55-gallon drums (Appendix B, Figure B-1). The product drum storage area contained drums that were ready for sale to the oil industry. After they were brought to the facility from the oil field, partially-filled drums were stored in the northwest corner of the storage area. Facility personnel stated that partially-filled drums with similar contents were combined on site. However, before the management change, some partially-filled drums were emptied directly into the shop sump. Empty drums were stored along the east fence. Lone Star Drum of Odessa, Texas, refurbishes Enviro-Chem's empty drums.

Other storage containers are also located in the storage area. One 840-gallon tote tank located along the east fenceline near the southeast corner of the storage area contains liquid wastes that were formerly stored in the shop sump (Appendix C, Photograph No. 5). Appendix F contains an estimate of the weight of the liquid waste managed in the 840-gallon tote tank.

4.0 SUMMARY

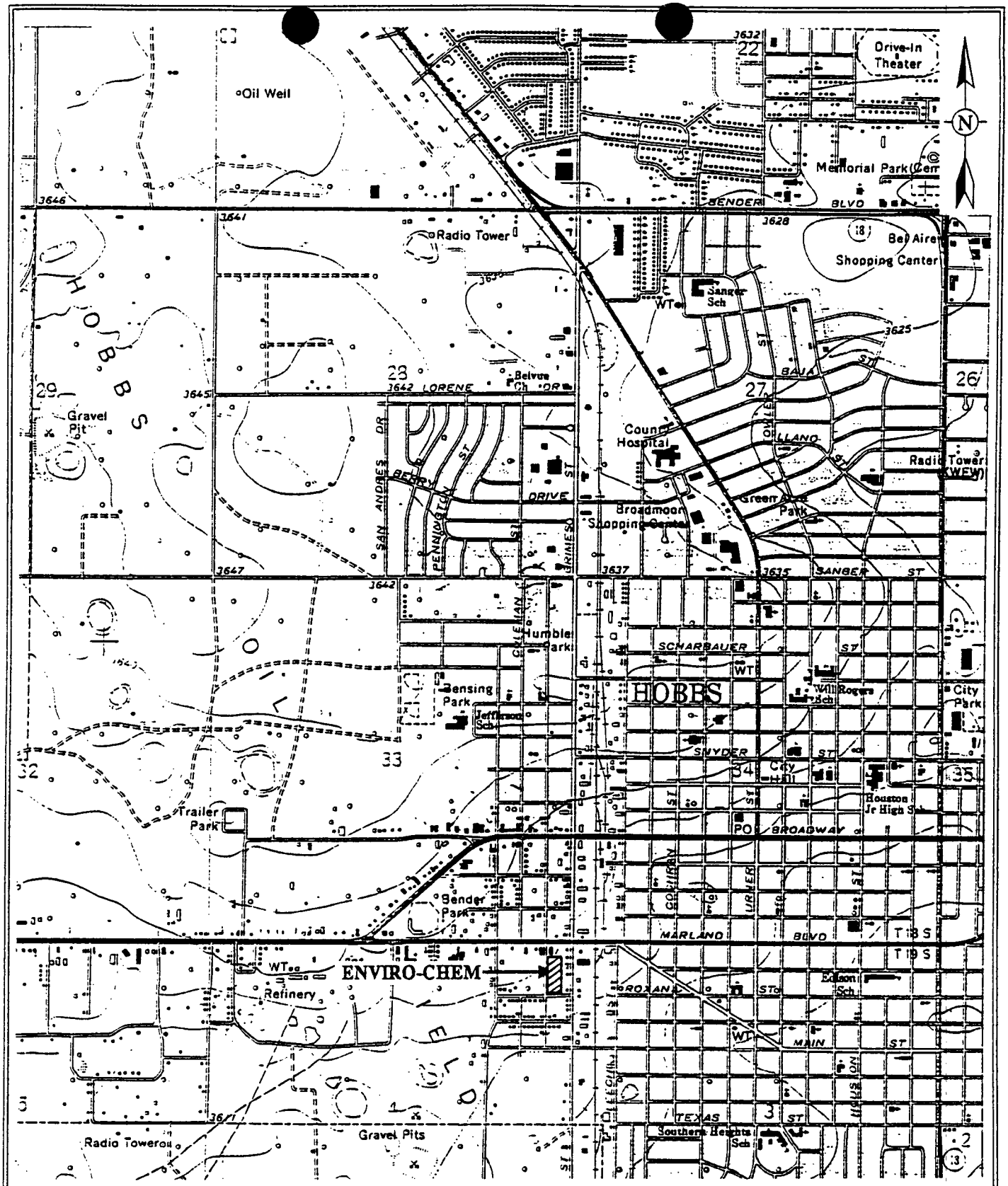
PRC provided technical assistance to EPA Region 6 in conducting a CDI of the Enviro-Chem facility in Hobbs, New Mexico. Enviro-Chem blends and sells oil field production chemicals and has been operating for about 4 years. Enviro-Chem personnel indicated that the facility does not have an EPA identification number.

Analysis of the liquid waste in the shop sump—which is one of the waste management units—indicated that the liquid waste exhibits the characteristic of ignitability. The open-topped sump is located along the eastern fenceline next to a public alley. Liquid waste from the shop sump is also stored in an 840-gallon tote tank located less than 50 feet from fenceline near the southeast corner of the facility. The facility has been accumulating liquid wastes in the sump for over 2 years, and plans to dispose of the waste after it receives an EPA identification number. Appendix F documents that the shop sump and the 840-gallon tote tank may be storing over 19,000 kilograms of hazardous waste. Attachment A contains the analytical data summary sheets. PRC delivered a complete analytical data package to EPA in June 1995 for data validation.

APPENDIX A

FACILITY LOCATION MAP

(One Sheet)



SOURCE: MODIFIED FROM USGS, HOBBS WEST, NEW MEXICO, QUADRANGLE, 1979

ENVIRO-CHEM
HOBBS, NEW MEXICO

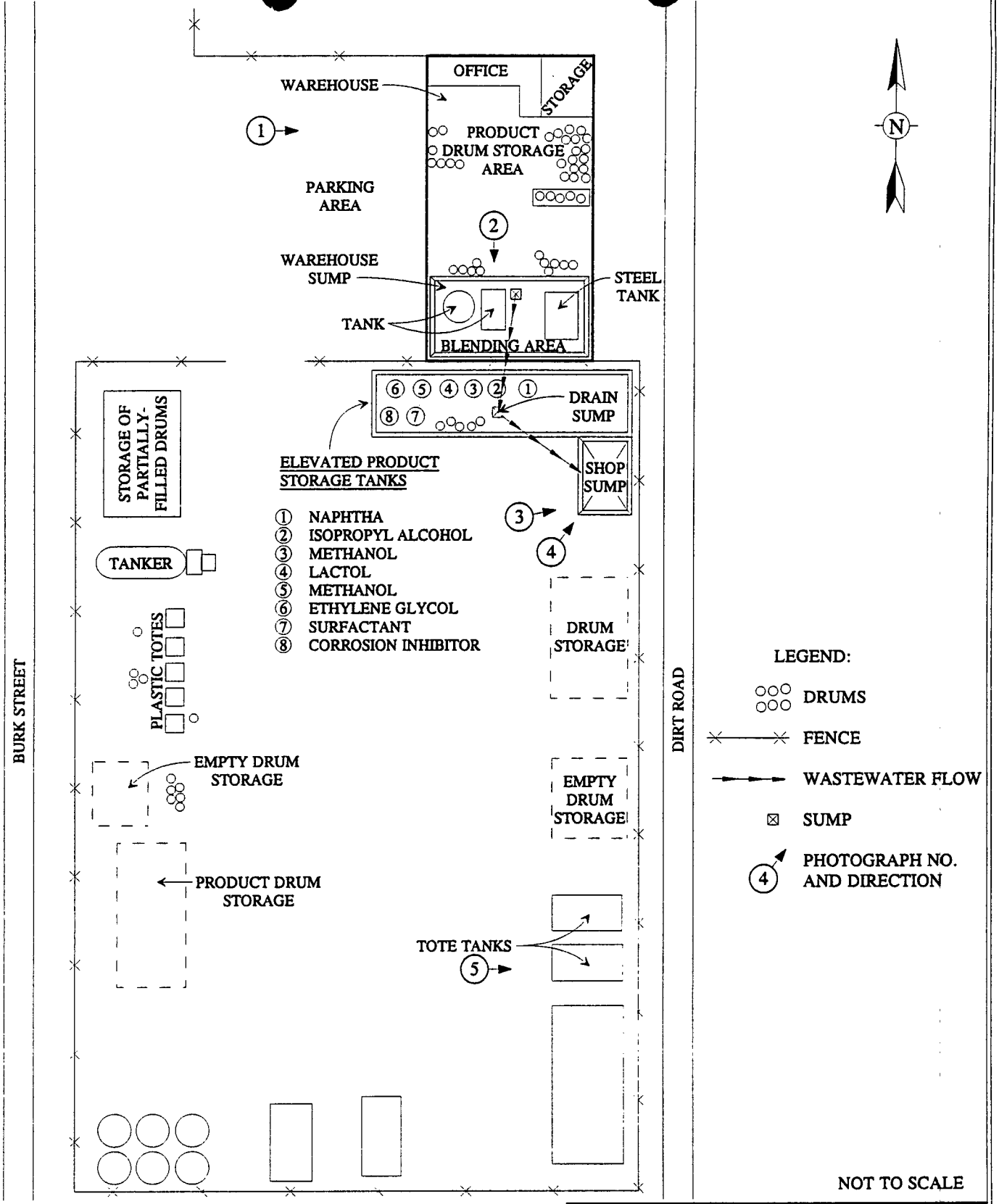
FIGURE A-1
FACILITY LOCATION MAP

PRC Environmental Management, Inc.

APPENDIX B

FACILITY LAYOUT MAP

(One Sheet)



ENVIRO-CHEM
HOBBS, NEW MEXICO

FIGURE B-1
FACILITY LAYOUT MAP

SOURCE: PRC, APRIL 1995

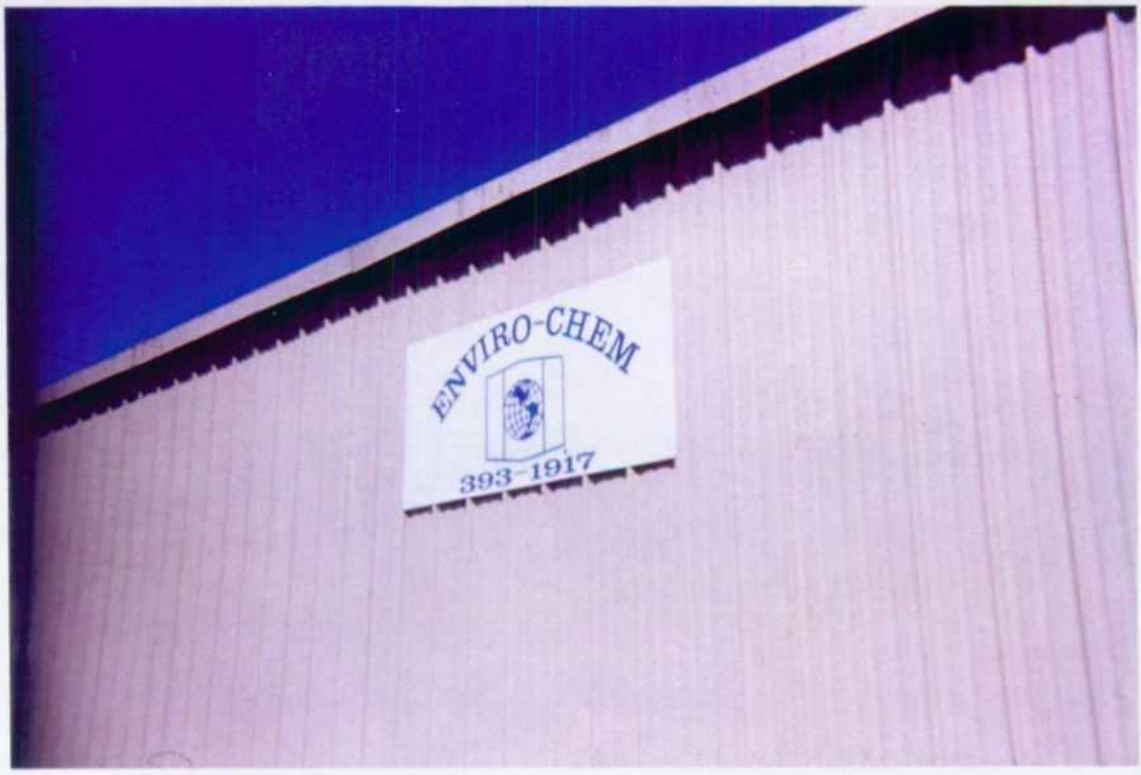
PRC Environmental Management, Inc.

APPENDIX C

PHOTOGRAPHS

(Three Sheets)

PHOTOGRAPH NO. 1



Date: 04/25/95 Picture Taken by: Lynette Collins, PRC Direction Facing: E
Picture Description: Enviro-Chem facility sign

PHOTOGRAPH NO. 2

Date: 04/25/95 Picture Taken by: Lynette Collins, PRC Direction Facing: S
Picture Description: Blending tanks

PHOTOGRAPH NO. 3

Date: 04/25/95 Picture Taken by: Lynette Collins, PRC Direction Facing: E
Picture Description: Shop sump

PHOTOGRAPH NO. 4

Date: 04/25/95 Picture Taken by: Mark Butler, PRC Direction Facing: NE
Picture Description: PRC collecting liquid waste samples from the shop sump

PHOTOGRAPH NO. 5

Date: 04/25/95 Picture Taken by: Lynette Collins, PRC Direction Facing: E

Picture Description: Tote tank that also stores liquid wastes from the shop sump

APPENDIX D

INSPECTION NOTES

(Three Sheets)

(38)

M. Buttle 4-25-95

ENVIRO-CHEM 4-25-95 (39)

Mark Buttle (?) (70x060)21? Jim Bulletti

1410 JOE SMITH, Ken Brumley

- corrosion chemical
- scale inhibitors
- emulsifier

Blending Area
- Steel tank - solvent-based products
- poly tank - water-based products
- Mr. Price of OCD has inspected the oil field end of it
- Primary customers are related to oil business - drilling and production. 4th year of operation.

Blending process
- water ⇒ in prod, toluene, xylenes, oil, water ⇒ waste stored in the back in the sump or drums in the back.
- Joe Smith became a manager in 11/94 and stopped the discharge to the sump.
- No waste have been hauled off-site. About 20 drums of waste materials are stored in the back.
- Naptha-based solvents - iso propyl alcohol. Tiff taped the discussion of the sump process.
- Dimension of the sump is 8×8×10 ft.(?) almost full.

(40)

M. Bittler 4-25-95

ENVIRO-CHEM 4-25-95 (41)

Mark Bittler 170R0603213

- toluene, methanol, xylene -) &
  intermediate chemicals could
  contain toluene and xylene.
- Acid surfactants are also ~~put~~
  generated.
- Some acid surfactant drums
  w/ about 2 to 3 gallons in
  it are emptied into the sump
- Some partial drums of scale
  inhibitor, corrosion inhibitor,
  & oxygen scavenger.
- Partial drums are combined
  on-site and reused.
- Partial drums are stored along
  the ~~east~~ west fence.
- Empty drums are scattered
  around the facility. Mostly along east.
- Lone Star drum from Odessa
  refurbishes drums (poly & steel).
- Lone Star's policy for accepting
  drums is < 1 inch of material.
  If > 1 inch, may have put
  into the sump (20 mo.).
- Before the last 20 mo, all
  material > 1 inch in drums
  were combined and ~~drummed~~ PORTOPAKS.
- (Stored in southeast corner of
  site). Portopaks stored about [illegible]

(42)

[illegible]

M. Butler 4/25/95

ENVIROCHEM 4-25-95 (43)
Mark Butler 170606032[illegible]

- all other drums ⓒ of finished and intermediate products are stored throughout the facility
- Repackage material in the
- Empty drums along west fence.
- 840 gallon tote tanks
- EPA INSTRUCTS PRC TO COLLECT TOTAL VOA, AND TCLP VOAs OF THE AQUEOUS PHASE. TCLP METALS OF THE SLUDGE.

1535 START SAMPLING OUTSIDE SUMP. ID IS (MB) ENVIROCH ~~SAMPLE~~ - SUMP-01 FOR TOTAL VOAs AND TCLP VOAs. ~~SAMPLE~~ (MB)

1540 FINISHED SAMPLING samples 01 and 02. SAMPLE 02 IS CALLED ENVIROCH-SUMP-02 AND IS A DUPLICATE OF ENVIROCHEM-SUMP-01. ANALYSES INCLUDE TOTAL VOAs AND TCLP VOAs. LYNETTE AND JEFF COLLECTED THE samples.

M. Butler

APPENDIX E

CHAIN-OF-CUSTODY FORMS

(Two Sheets)

Chain of Custody Record

PDP Analytical Services
1680 Lake Front Circle, Suite B ▪ The Woodlands, Texas 77380 ▪ Phone (713) 363-2233 ▪ Fax (713) 298-5784

Client Name / Address: PRC
350 N. ST. PAUL ST., SUITE 2600
DALLAS, TX 75201 (214) 754-8765

Send Report to: MARK BUTLER
C/O PRC

Project Number: 176RCC0321BLA

Project Name: ENVIRO-CHEM HOBBS, NM

Samplers (Signature): [illegible]

P.O. Number:

Sta. No.	Date	Time	Comp.	Grab	Station Location	Number of Containers	Matrix	TOTAL VOA	TCLP VOA	IGNITABILITY				Remarks
01	4/25/05	1535		X	ENVIROCH-SUMP-01	9	LIQUID WASTE	X	X	X				MS/MSD
02	4/25/05	1540		X	ENVIROCH-SUMP-02	4	LIQUID WASTE	X	X					

	Date / Time		Date / Time	
Relinquished by (Signature): [illegible]	4/25/05 1700	Received by (Signature): FEDEX		Remarks: FEDEX AIRBILL NO. 391176312 2 COOLER 3 OF 3
Relinquished by (Signature)	Date / Time	Received by (Signature)	Date / Time	
Relinquished by (Signature)	Date / Time	Received for Laboratory by (Signature)	Date / Time	
Method of Shipment:				PDP Quote Number:

Distribution: Original accompanies shipment; Copy to coordinator and field files

FedEx Federal Express

USE THIS AIRBILL FOR SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO AND ALL NON U.S. LOCATIONS.
QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER 3911763122

3911763122

SENDER'S COPY

1 SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER: 1307-8937-4 | Date: 4/25/95

From (Your Name) Please Print: MACK BUTLER | Your Phone Number (Very Important): 214-754-8768

Company: P R L | Department/Floor No.

Street Address: 250 E ST PAUL STE 2600

City: DALLAS | State: TX | ZIP Required: 75201

2 To (Recipient's Name) Please Print | Recipient's Phone Number (Very Important): (713)

Company: EDP ANALYTICAL SERVICES | Department/Floor No.

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): 1660 LAKE FRONT CIRCLE STE

City: THE WOODLANDS | State: TX | ZIP Required

YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)

H IF HOLD AT FEDEX LOCATION, Print FEDEX Address Here
Street Address
City | State | ZIP Required

3 PAYMENT 1 Bill Sender 2 Bill Recipient's FedEx Acct. No. 3 [X] Bill 3rd Party FedEx Acct. No. 4 Bill Credit Card
5 Cash/Check Acct./Credit Card No. Exp. Date

4 SERVICES (Check only one box)

Priority Overnight (Delivery by next business morning†)
11 [X] OTHER PACKAGING
16 FEDEX LETTER*
12 FEDEX PAK*
13 FEDEX BOX
14 FEDEX TUBE

Standard Overnight (Delivery by next business afternoon† No Saturday delivery†)
51 OTHER PACKAGING
66 FEDEX LETTER*
52 FEDEX PAK*
53 FEDEX BOX
54 FEDEX TUBE

Economy Two-Day (Delivery by second business day †)
30 ECONOMY*
* Economy Letter Rate not available. Minimum charge: One pound Economy rate.

Government Overnight (Restricted for authorized users only)
46 GOVT LETTER
41 GOVT PACKAGE

Freight Service (for packages over 150 lbs.)
70 OVERNIGHT FREIGHT**
80 TWO-DAY FREIGHT**
(Confirmed reservation required)
† Delivery commitment may be later in some areas.
*Declared Value Limit $500
**Call for delivery schedule.

5 DELIVERY AND SPECIAL HANDLING (Check services required)

Weekday Service
1 HOLD AT FEDEX LOCATION WEEKDAY (Fill in Section H)
2 [X] DELIVER WEEKDAY

Saturday Service
31 HOLD AT FEDEX LOCATION SATURDAY (Fill in Section H)
3 DELIVER SATURDAY (Extra charge) (Not available to all locations)
9 SATURDAY PICK-UP (Extra charge)

Special Handling
4 DANGEROUS GOODS (Extra charge)
6 DRY ICE Dangerous Goods Shipper's Declaration not required
Dry Ice, 9, UN 1845 ___ x ___ kg. 904 III
12 HOLIDAY DELIVERY (If offered) (Extra charge)

6 PACKAGES | WEIGHT In Pounds Only | YOUR DECLARED VALUE (See right)
1 | |
1 | |
1 | |
Total | Total | Total

DIM SHIPMENT (Chargeable Weight) ___ lbs
___ x ___ x ___

SERVICE CONDITIONS, DECLARED VALUE AND LIMIT OF LIABILITY

Use of this airbill constitutes your agreement to the service conditions in our current Service Guide, available upon request. See back of sender's copy of this airbill for information. Service conditions may vary for Government Overnight Service. See U.S. Government Service Guide for details.

We will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and document your actual loss for a timely claim. Limitations found in the current Federal Express Service Guide apply. Your right to recover from Federal Express for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of $100 or the declared value specified to the left. Recovery cannot exceed actual documented loss. The maximum Declared Value for FedEx Letter and FedEx Pak packages is $500.

In the event of untimely delivery, Federal Express will at your request and with some limitations refund all transportation charges paid. See Service Guide for further information.

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

7 Release Signature:

Base Charge
Declared Value Charge
Other 1
Other 2
Total Charges

REVISION DATE 4/94
FORMAT #160
160

APPENDIX F

CALCULATIONS OF WASTE VOLUME AND WEIGHT

(One Sheet)

APPENDIX F

CALCULATIONS OF WASTE VOLUME AND WEIGHT

SHOP SUMP

Waste Volume (8 feet square by 10 feet deep [less 1 foot freeboard]) = 576 cubic feet (ft^3)

Density (used the density of water as an estimate) = 8.34 pounds/gallon (lb/gal.)

Total weight of liquid waste in sump = 576 ft^3 x 7.48 gal./ft^3 x 8.34 lb/gal. x 0.454 kilogram (kg)/lb

= 16,313 kilograms

TOTE TANK

Waste Volume (based on capacity provided by facility personnel) = 840 gallons

Density (used the density of water as an estimate) = 8.34 lb/gal.

Total weight of liquid waste in the tote tank = 840 gal. x 8.34 lb/gal. x 0.454 kg/lb

= 3,180 kilograms

ATTACHMENT A

PRC ANALYTICAL DATA SUMMARY SHEETS

(14 Sheets)

PDP ANALYTICAL SERVICES
1680 Lake Front[redacted]rcle, The Woodlands, Tx 77380 • P[redacted]e (713)363-2233

Client: PRC ENVIRONMENTAL Episode No.: 2922	Project Name: ENVIRO-CHEM Project No.: 170R0603213LA

CASE NARRATIVE

Two liquid samples were received for analysis on 04/26/95. Results for liquid samples are reported on a wet weight basis.

All batch quality control (QC) results (Duplicates, Matrix Spikes, Matrix Spike Duplicates) are included in this data package. Batch QC may or may not have been performed on your samples.

LAB ID:	CLIENT ID:	SAMPLE MATRIX:	DATE SAMPLED:
2922.01	ENVIROCH-SUMP-01	LIQUID	04/25/95
2922.02	ENVIROCH-SUMP-02	LIQUID	04/25/95

SAMPLE RECEIPT AND LOG-IN:

No problems were encountered.

TCLP VOLATILES:

TOTAL VOLATILES:

GENERAL CHEMISTRY:

2. CHAIN-OF-CUSTODY

Chain of Custody Record

PDP Analytical Services
1680 Lake Front Circle, Suite B ▪ The Woodlands, Texas 77380 ▪ Phone (713) 363-2233 ▪ Fax (713) 298-5784

SHEET 1 OF 1

Client Name / Address: PRC
350 N. ST. PAUL ST., SUITE 2600
DALLAS, TX 75201 (214) 754-8765

Send Report to: MARK BUTLER
C/O PRC

Project Number: 170R06032131.A

Project Name: ENVIRO-CHEM HOBBS, NM

Samplers (Signature): Lynette Collins

P.O. Number:

Sta. No.	Date	Time	Comp.	Grab	Station Location	Number of Containers	Matrix	TOTAL VOA	TCLP VOA	IGNITABILITY				Remarks
1922 01	01	4/25/95	1535		X	ENVIROCH-SUMP-01	9	LIQUID WASTE	X	X	X				MS/MSD
02	02	4/25/95	1540		X	ENVIROCH-SUMP-02	4	LIQUID WASTE	X	X					

Relinquished by (Signature)	Date / Time	Received by (Signature)	Date / Time	Remarks:
[signature]	4/25/95 1700	FEDEX		FEDEX AIRBILL NO. 391176312 2
Relinquished by (Signature)	Date / Time	Received by (Signature)	Date / Time	
				COOLER 3 OF 3
Relinquished by (Signature)	Date / Time	Received for Laboratory by (Signature)	Date / Time	
		Jennifer Cushman		
Method of Shipment:				PDP Quote Number:

Distribution: Original accompanies shipment; Copy to coordinator and field files

00004

PDP ANALYTICAL SERVICES
SAMPLE LOG-IN SHEET

LOGGED BY: JENNIFER CUSHMAN DATE OF PHYSICAL LOG-IN: 4/26/95

Episode #: 2922
Client ID: PRC ENVIRONMENTAL
Project ID: ENVIRO-CHEM
Project #: 170R0603213LA
PO Number:
Courier/No.: FED-EX/3911763122

DATE OF COMPUTER LOG-IN: 27-Apr-95
COMPUTER LOG-IN BY: JC
COMPUTER ID: ME

Lab ID	Client ID	Testing Required	No. Cont.	Sample Matrix	Date Sampled	Date Received	Date Due	Remarks
2922.01	ENVIROCH-SUMP-01	TOTAL 70A TCLP 70A IGNITABILITY	9	LIQUID	4/25/95	4/26/95	5/10/95	**MS/MSD
2922.02	ENVIROCH-SUMP-02	TOTAL 70A TCLP 70A	4	LIQUID	4/25/95	4/26/95		

**MS/MSD REQUESTED BY CLIENT

Weight basis: _X_ wet ___ dry

Deliverables: ___ norm _X_ CLP-like ___ CLP

___ raw data ___ electronic

APPROVED BY/DATE: 4/26/95

SEND REPORT TO: MARK BUTLER

TCLP VOLATILES

POP ANALYTICAL SERVICES

1680 Lake Front Circle, Ste. B; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client:	PRC ENVIRONMENTAL	Client Sample ID:	ENVIROCH-SUMP-01	Date Sampled:	04/25/95
Project Name:	ENVIRO-CHEM	POP Sample ID:	2922.01	Date Received:	04/26/95
Project No.:	170R0603213LA	Report No.:	E3226	Date Reported:	05/26/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix:	LIQUID	Dilution:	5.0	Method Ref.:	SW846-3240
Multiplying Factor:	5.0	Date TCLP Extracted:	05/09/95	GC/MS File ID:	E3226
Sample Volume:	5.0 ml	Date Analyzed:	05/23/95	Analyst:	LI

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	5102 J
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	6000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	96
Toluene-d8	50	(88-110)	62 *
Bromofluorobenzene	50	(86-115)	62 *

Method Blank ID:2922V.MBLK3 LCS ID: NA MS ID: NA MSD ID: NA DUP ID: NA

TCLP Blank ID: 2922V.FBLK1 TCLP LCS ID: 2922V.WLCS3 TCLP MS ID:2922.01MS TCLP MSD ID:NA TCLP DUP ID:NA

* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

000015

PDP ANALYTICAL SERVICES
1680 Lake Front Circle, Ste. 8; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client:	PRC ENIVRONMENTAL	Client Sample ID:	ENVIROCH-SUMP-01	Date Sampled:	04/25/95
Project Name:	ENVIRO-CHEM	PDP Sample ID:	2922.01DL	Date Received:	04/26/95
Project No.:	170R0603213LA	Report No.:	E5233	Date Reported:	05/26/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix:	LIQUID	Dilution:	25.0	Method Ref.:	SW846-8240
Multiplying Factor:	25.0	Date TCLP Extracted:	05/09/95	GC/MS File ID:	E5233
Sample Volume:	5.0 ml	Date Analyzed:	05/24/95	Analyst:	LZ

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	125	ND
1,2-Dichloroethane	500	125	ND
2-Butanone	200000	250	3300
Benzene	500	125	ND
Carbon tetrachloride	500	125	ND
Chlorobenzene	100000	125	ND
Chloroform	6000	125	ND
Tetrachloroethene	700	125	ND
Trichloroethene	500	125	ND
Vinylchloride	200	250	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	108
Toluene-d8	50	(88-110)	104
Bromofluorobenzene	50	(86-115)	107

Method Blank ID:2922V.WBLK1 LCS ID: NA MS ID: NA MSD ID: NA DUP ID: NA

TCLP Blank ID: 2922V.FBLK1 TCLP LCS ID: 2922V.WLCS1 TCLP MS ID:2922.01MS TCLP MSD ID:NA TCLP DUP ID:NA

* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

0000022

PDP ANALYTICAL SERVICES
1680 Lake Front Circle, Ste. 8; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client:	PRC ENIVRONMENTAL	Client Sample ID:	ENVIROCH-SUMP-02	Date Sampled:	04/25/95
Project Name:	ENVIRO-CHEM	PDP Sample ID:	2922.02	Date Received:	04/26/95
Project No.:	170R0603213LA	Report No.:	E3224	Date Reported:	05/26/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix:	LIQUID	Dilution:	5.0	Method Ref.:	SW846-8240
Multiplying Factor:	5.0	Date TCLP Extracted:	05/09/95	GC/MS File ID:	E3224
Sample Volume:	5.0 ml	Date Analyzed:	05/23/95	Analyst:	LI

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	1610 E
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	6000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	94
Toluene-d8	50	(88-110)	99
Bromofluorobenzene	50	(86-115)	93

Method Blank ID: 2922V.MBLK3 LCS ID: NA MS ID: NA MSD ID: NA DUP ID: NA

TCLP Blank ID: 2922V.FBLK1 TCLP LCS ID: 2922V.MLCS3 TCLP MS ID: 2922.01MS TCLP MSD ID: NA TCLP DUP ID: NA

* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

000029

PDP ANALYTICAL SERVICES

1660 Lake Front Circle, Ste. 8; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client:	PRC ENVIRONMENTAL	Client Sample ID:	ENVIROCH-SUMP-02	Date Sampled:	04/25/95
Project Name:	ENVIRO-CHEM	PDP Sample ID:	2922.02DL	Date Received:	04/26/95
Project No.:	170R0603213LA	Report No.:	E3232	Date Reported:	05/26/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix:	LIQUID	Dilution:	10.0	Method Ref.:	SW846-8240
Multiplying Factor:	10.0	Date TCLP Extracted:	05/09/95	GC/MS File ID:	E3232
Sample Volume:	5.0 ml	Date Analyzed:	05/24/95	Analyst:	LI

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	50	ND
1,2-Dichloroethane	500	50	ND
2-Butanone	200000	100	1700
Benzene	500	50	ND
Carbon tetrachloride	500	50	ND
Chlorobenzene	100000	50	ND
Chloroform	6000	50	ND
Tetrachloroethene	700	50	ND
Trichloroethene	500	50	ND
Vinylchloride	200	100	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	101
Toluene-d8	50	(88-110)	91
Bromofluorobenzene	50	(86-115)	94

Method Blank ID:2922V.MBLK3 LCS ID: NA MS ID: NA MSD ID: NA DUP ID: NA

TCLP Blank ID: 2922V.FBLK1 TCLP LCS ID: 2922V.MLCS3 TCLP MS ID:2922.01MS TCLP MSD ID:NA TCLP DUP ID:NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

TOTAL VOLATILES

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

SUMP-01

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603213LA Site: ENVIRO-C Location: Group:

Matrix: (soil/water) WATER Lab Sample ID: V292201

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B5148.D

Level: (low/med) Date Received:

% Moisture: not dec. 0 Date Analyzed: 5/24/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 50000.0

Soil Extract Volume: (uL) Soil Aliquot Volume: (uL)

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/L	Q
74-87-3	Chloromethane	500000	UD
74-83-9	Bromomethane	500000	UD
75-01-4	Vinyl Chloride	500000	UD
75-00-3	Chloroethane	500000	UD
75-09-2	Methylene Chloride	500000	UD
67-64-1	Acetone	500000	UD
75-15-0	Carbon Disulfide	500000	UD
75-35-4	1,1-Dichloroethene	500000	UD
75-34-4	1,1-Dichloroethane	500000	UD
540-59-0	1,2-Dichloroethene (total)	500000	UD
67-66-3	Chloroform	500000	UD
107-06-2	1,2-Dichloroethane	500000	UD
78-93-3	2-Butanone	500000	UD
71-55-6	1,1,1-Trichloroethane	500000	UD
56-23-5	Carbon Tetrachloride	500000	UD
75-27-4	Bromodichloromethane	500000	UD
78-87-5	1,2-Dichloropropane	500000	UD
10061-01-5	cis-1,3-Dichloropropene	500000	UD
79-01-6	Trichloroethene	500000	UD
124-48-1	Dibromochloromethane	500000	UD
79-00-5	1,1,2-Trichloroethane	500000	UD
71-43-2	Benzene	500000	UD
10061-02-6	trans-1,3-Dichloropropene	500000	UD
75-25-2	Bromoform	500000	UD
108-10-1	4-Methyl-2-Pentanone	500000	UD
591-78-6	2-Hexanone	500000	UD
127-18-4	Tetrachloroethene	500000	UD
79-34-5	1,1,2,2-Tetrachloroethane	500000	UD
108-88-3	Toluene	329500	JD
108-90-7	Chlorobenzene	500000	UD
100-41-4	Ethylbenzene	480500	JD
100-42-5	Styrene	500000	UD
1330-20-7	Xylene (total)	5E+06	D

VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

SUMP-02

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603213LA Site: ENVIRO-C Location: Group:

Matrix: (soil/water) WATER Lab Sample ID: V292202

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B5150.D

Level: (low/med) Date Received:

% Moisture: not dec. 0 Date Analyzed: 5/24/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 50000.0

Soil Extract Volume: (uL) Soil Aliquot Volume: (uL)

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/L	Q
74-87-3	Chloromethane	500000	UD
74-83-9	Bromomethane	500000	UD
75-01-4	Vinyl Chloride	500000	UD
75-00-3	Chloroethane	500000	UD
75-09-2	Methylene Chloride	500000	UD
67-64-1	Acetone	500000	UD
75-15-0	Carbon Disulfide	500000	UD
75-35-4	1,1-Dichloroethene	500000	UD
75-34-4	1,1-Dichloroethane	500000	UD
540-59-0	1,2-Dichloroethene (total)	500000	UD
67-66-3	Chloroform	500000	UD
107-06-2	1,2-Dichloroethane	500000	UD
78-93-3	2-Butanone	500000	UD
71-55-6	1,1,1-Trichloroethane	500000	UD
56-23-5	Carbon Tetrachloride	500000	UD
75-27-4	Bromodichloromethane	500000	UD
78-87-5	1,2-Dichloropropane	500000	UD
10061-01-5	cis-1,3-Dichloropropene	500000	UD
79-01-6	Trichloroethene	500000	UD
124-48-1	Dibromochloromethane	500000	UD
79-00-5	1,1,2-Trichloroethane	500000	UD
71-43-2	Benzene	500000	UD
10061-02-6	trans-1,3-Dichloropropene	500000	UD
75-25-2	Bromoform	500000	UD
108-10-1	4-Methyl-2-Pentanone	500000	UD
591-78-6	2-Hexanone	500000	UD
127-18-4	Tetrachloroethene	500000	UD
79-34-5	1,1,2,2-Tetrachloroethane	500000	UD
108-88-3	Toluene	251000	JD
108-90-7	Chlorobenzene	500000	UD
100-41-4	Ethylbenzene	388000	JD
100-42-5	Styrene	500000	UD
1330-20-7	Xylene (total)	3E+06	D

GENERAL CHEMISTRY

PDP ANALYTICAL SERVICES
1680 Lake Front Circle, Ste.8; Woodlands TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL
Project Name: ENVIRO-CHEM
Project No: 170R0603213LA

Date Reported: 05-26-95
Report No: I922IGNT
Analyst: KM

WET CHEMISTRY PARAMETER: Ignitability

Method Reference: SW-846 1010

UNITS: Degrees F

PDP LABORATORY ID	CLIENT ID	MATRIX	DATE SAMPLED	DATE RECEIVED	DATE PREPARED	DATE ANALYZED	QUANT LIMIT	RESULT	SPIKE ADDED OR TRUE VALUE	RELATIVE PERCENT DIFF(20)	PERCENT RECOVERY (75-125)
2922.01	ENVIROCH-SUP-01	LIQUID	04-25-95	04-26-95	NA	05-22-95	NA	100			
					QUALITY ASSURANCE/QUALITY CONTROL						
2922.LCS1	LAB CONTROL STD	NA	NA	NA	NA	05-22-95	NA	85	84		101
2922.LCS2	LAB CONTROL STD	NA	NA	NA	NA	05-22-95	NA	84	84	1.2	100
2922.01D	DUPLICATE	NA	NA	NA	NA	05-22-95	NA	98		2.0	

ATTACHMENT B

ENVIRO-CHEM ANALYTICAL DATA SUMMARY SHEETS

(Two Sheets)

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

Company: Envirochem
Address: P.O. Box 668
City, State: Hobbs, NM 88240

Date: 4/11/95
Lab #: H2004

Project Name: not given
Location: not given
Sampled by: JS Date: not given Time: not given
Analyzed by: HM Date: 4/7-10/95 Time: various
Sample Type: Water Sample Condition: Intact Units: mg/L

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	Shop-Sump Pit	385.6	19.137	1.906	1.592	2.162	5.947	6.240
	QC Recovery	41.9	0.943	0.830	0.897	0.879	0.863	0.910
	QC Spike	40.6	0.878	0.873	0.867	0.862	0.853	0.867
	Accuracy	103.2%	107.4%	95.1%	103.5%	102.0%	101.2%	105.0%
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - GAS CHROMOTOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540 OR 3510

Michael R. Fowler

4/11/95
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

CHEMICAL ANALYSIS OF WATER

Company : Envirochem
City, St.: P.O. Box 668, Hobbs, NM
Proj.Name: not given
Location : not given

Lab #: H2004
Date Received: 4/6/95
Date Analyzed: 4/7/95
4/10/95

Sample 1 : Shop - Sump Pit

Units: mg/L

PARAMETER	RESULT 1
pH	4.16
Hardness ($CaCO_3$)	4,050
Calcium ($CaCO_3$)	2,250
Magnesium ($CaCO_3$)	1,800
Sulfate (SO_4^-)	3,500
Chloride (Cl^-)	9,400
Total Dissolved Solids	1,242
Total Alkalinity	nil
Bicarbonate	nil
Carbonate	nil
Conductivity (umhos/Cm)	25,100

4074 gallons

Michael R. Fowler

4/10/95
Date