GW - 199

PERMITS, RENEWALS, & MODS Application

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

FEBRUARY 9, 2012

Ms. Stacee Schweigeit
Champion Technologies
3200 Southwest Freeway
Suite 2700
Houston, TX 77042

Dear Ms. Schweigeit:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit is not required to operate under a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for GW-199 (Hobbs Facility) is hereby rescinded and you are not required to proceed with the renewal of this expired WQCC Discharge Permit. OCD will close this discharge permit in its database.

Previously, Champion has conducted abatement of ground water contamination at this facility under the authority of its WQCC Discharge Permits, pursuant to 20.6.2.4000 NMAC (PREVENTION AND ABATEMENT OF WATER POLLUTION). OCD has determined that Champion does not intentionally discharge at this facility; therefore, no WQCC Discharge Permit is required. However, because of existing ground water contamination at this facility, OCD is requiring Champion to continue to abate pollution of ground water pursuant to 19.15.30 NMAC (REMEDIATION). The new Abatement Plan case number for the former GW-199 site is **AP-108**. Please use this Abatement Plan case number in all future correspondence. Please contact Glenn von Gonten at 505-476-3488 to discuss how Champion may complete its abatement of the remaining ground water contamination at this facility.

Because this WQCC Discharge Permit will now longer be in effect, you may be required to obtain separate OCD permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit.

If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

Jami Bailey
Director

JB/gvg

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Oilfield Chemical Distribution Site GW-199 R

2. Operator Champion Technologies

Address: 4001 South Highway 18, Hobbs, New Mexico, 88240

Contact Person: James Hamilton Phone: (432) 563-0142

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3. Location: NE/4 Section 15 Township 19S Range 38E
Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

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

Name: Jayson Ussery Title: operations manager

Signature: Date: 4-20-11

E-mail Address: Jayson.Ussery@champtech.com

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

Champion Technologies owns the property.

Facility Contact
4001 South Highway 18
Hobbs, New Mexico, 88240

Jayson Ussery (District Operations Manager):
(575)393-7726
James Hamilton (Regional HSE Manager)
(432) 563-0142

Corporate Contact
3200 Southwest Freeway, Suite 2700
Houston, Texas 77027

Reecie LoPiccolo (Paralegal): (713)590-7039

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

A general facility site map is provided in Figure 3 and a tank farm map is provided in Figure 4.

The Champion Technologies Hobbs, New Mexico facility is a bulk distribution center for water-based and oil-based chemicals used for down-hole treatment of oil and gas wells in western Texas and New Mexico. The facility is located approximately 1.7 miles south of Hobbs and encompasses an area of approximately 7 acres on the east side of Highway 18. The facility is bordered by Highway 18 on the east side, undeveloped land on the west side, a residence and undeveloped land used for cattle ranching on the south side, and another oilfield service company on the north side. The facility is completely enclosed by a chain link fence with an entrance through a gate facing the highway or through the office building and is equipped with outdoor lighting to illuminate the facility at night.

The Hobbs facility is located on a topographic high compared to the surrounding area. The facility grounds exhibit little topographic relief with a slight slope from east to west. Storm water flow is towards the west side of the facility where it travels approximately ¼ miles before it follows the surface counters to the southeast where it intersects with Monument Draw, approximately four miles southeast of the facility.

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

As a bulk distribution center for water-based and oil-based chemicals used for down-hole treatment of oil and gas wells, the Hobbs facility stores a large range of products to meet clients' needs. Products generally fall into one of fourteen groups which are described in Table 1. The facility has a chemical bulk storage capacity of 120,000 gallons, based upon the AST shell capacity. A list of the tanks, contents, and size is provided in Table 2. The facility on average stores between 40,000 – 60,000 gallons of portable containers (drum/totes). Drums/totes are stored within secondary containment in the Drum/Tote Storage Area #1 and Drum/Tote Storage Area #2. The warehouse is used to store equipment (ie. forklifts) only. While the drum/tote inventory varies based upon clients' needs and seasonally, contents for drums/totes at the facility will be one of the fourteen groups described in Table 1. Chemical storage locations are shown on the Facility Site Map provided in Figure 3.

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

Effluent
The office and warehouse generates paper waste, food, and general wastes associated with day to day office activities which are picked up weekly by Waste Management. Waste Management hauls the office trash to Lea County Landfill.

Domestic sewage is generated from the office and warehouse areas. Sewage from these two building flows into an underground septic tank system and then is dispersed onto the leachfield. The septic system was installed in October, 1993 and was issued a liquid waste permit from the New Mexico Environment Department Community Service Bureau HO930060. Since its issuance in 1993, the Hobbs facility has upgraded/performed maintenance on the septic system and has been issued a new permit for each. The current permit number is HO020063 and is in good standing with no variances.

Per 20.7.3 New Mexico Administrative Code Table 20.1 the design flow rate requirements for a commercial facility with an office is 20 gallons per person per day with an average working day of 8 hours. The Hobbs septic system is designed for 240 gallons or for twelve full time employees. The Hobbs facility has five people who are stationed at the facility throughout the day (eight hours per day). There are twenty-four salespersons or truck drivers that operate out of Hobbs, however, these people average being onsite less than one hour per day which is equivalent to 3 people per day. The average daily load to the septic system is 8 people or approximately 175 gallons per day.

The facility does not have an onsite wastewater treatment system. Vehicles are washed offsite at a local vendor's location and not at the facility. Vehicle maintenance is also performed by an offsite vendor at their location.

Waste Solids

The Hobbs, New Mexico facility is a registered conditionally exempt small quantity generator (CESQG) with a facility Resource Conservation and Recovery Act (RCRA) identification number of NMD986674869. All media that may come in contact with chemicals is evaluated to determine if it is hazardous or non-hazardous. Below is a listing of anticipated waste streams at the Hobbs facility.

When the facility has accumulated three drums of hazardous waste, Champion personnel contact Univar, a hazardous waste broker, to assist with the characterization and disposal of this waste. The goal is to not have more than 3 drums of hazardous waste onsite at any given time.

A. Accumulated Storm Water/Snow Melt Within Secondary Containment
Storage Location –Bulk Storage Tank Area, Drum/Tote Storage Area #1, and Drum/Tote Storage Area #2
Storage Container – Drum or Tote

Hobbs, New Mexico is located in an arid climate with an average annual precipitation of 16.49 inches according to the National Weather Service (http://www.srh.noaa.gov/maf/Coop_Climate/annhobbs.html). Hobbs, New Mexico is located in the Southeast Plains region with an estimated 25 year, 24 hours storm event of 2.0 to 4.5 inches for the region (http://pubs.usgs.gov/fs/fs-055-00/).

Due to the arid climate, storm events generally have a limited amount of accumulation and accumulated storm water and/or snowmelt quickly evaporates. The three containment areas, Bulk Storage Tank Area, Drum/Tote Storage Area #1 and Drum/Tote Storage Area # 2 do not have drains and require that accumulated storm water and/or snowmelt be pumped out manually. If accumulated precipitation needs to be pumped out, the facility follow the procedure listed in Section 13 and completes the dike drainage discharge form in Table 3.

B. Site Investigation/Remediation Derived Wastes
Storage Location – Drum/Tote Storage Area #1 or #2
Storage Container - Drum

The Hobbs location is currently working with the New Mexico Oil Conservation Division (NMOCD) regarding chromium in groundwater (AP-14). As part of this project, site investigation and remediation derived wastes are generated. These wastes are characterized and then picked for disposal by a licensed transporter to an ODC

approved landfill depending on its characterization. To date, all site investigation/remediation derived waste has been non-hazardous. The quantity generated varies depending on site investigation/remediation activities.

C. Absorbents
Storage Location – Drum/Tote Storage Area #1 or #2
Storage Container – Drum
If a spills or a leak occurs, it may be cleaned up with the use of absorbents. Several absorbents are stored onsite in the Spill Kit as a contingency measure. Once the absorbents are used, they are stored on-site in a closed, labeled container (designated 55-gallon drum). Once the container is full, the absorbents are characterized and transported by Univar to an approved ODC location. The quantity of absorbents averages less than one drum per year. Spills are managed in accordance to procedures described in the Spill Prevention, Control and Countermeasure (SPCC) Plan. A copy of the SPCC Plan is included as Appendix A.

D. Empty Drums
Storage Location – Drum/Tote Storage Area #1

During facility operations, drums are used to transport products to several clients in the surrounding area. When drums are empty, they are returned to the facility. If necessary, the facility may suck out remaining product into another drum (see waste stream F) to achieve the empty container requirement of less than one inch remaining in a drum, per Resource Conservation and Recover Act (RCRA). These drums are then picked up by West Texas Drums for recycling.

NOTE: empty drums are not considered to be hazardous material

E. Residual Products
Storage Location – Drum/Tote Storage Area #2
Storage Container – Drum or Tote

Residual products may be generated when empty drums return from the field and do not meet the requirements set forth by RCRA for an empty drum (see waste stream E – empty drums). These drums are pumped out manually and the residual products are placed within a labeled 55-gallon drum. Generally the quantity removed is less than ½ gallon. Based upon product knowledge, the residuals from Champion Products are compatible and are combined.

The Hobbs facility generates less than 2 drums on average per year of this material. The residual product drum is labeled as hazardous waste and is stored at the Drum/Tote Storage Area #2 within secondary containment.

F. Off Specification and Obsolete Products
Storage Location – Drum/Tote Storage Area #2
Storage Container – Drum or Tote

Occasionally some products may be off-specification or become obsolete. These products are evaluated to determine if they can be reused at another facility or as part of another finished product. The Hobbs facility generates less than 2 drums on average per year of this material. The residual product drum is labeled as hazardous waste and is stored at the Drum/Tote Storage Area #2 within secondary containment.

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

A – Summary Information: See response from question #7, Table 2, and Figures 3, 4, and 5 for facility maps

B – Collection and Storage Systems

The Hobbs facility has twenty-four aboveground storage tanks (ASTs), two tanks used as blenders, two drum/tote storage area, warehouse, and office. The storage tank area has sufficient secondary containment to exceed the requirements in the Spill Prevention, Control, and Countermeasure (SPCC) Rule and the New Mexico Discharge Plan requirement of 133% containment of the largest tank.

	Width (ft)	X	*Length (ft)*	=	*Area (ft2)*
Containment Area Dimensions:	105		60		6300

Dike Height (ft): 1.42 **Tank Footprint/Displacement (ft2):** 1206

Largest Tank within Containment: 6000 **gal or** 802.13 **ft3**

Net Volume: Dike Height X (Containment Area ft2 - Tank Displacement ft2)

= 1.42 ft X (6300 ft2 - 1206 ft2)

= 7234 ft3 or 54109 gal

Freeboard Calculation:

New Mexico: 133% Capacity of Largest Tank

Min. Berm Height for 133% Largest Tank:

= **133% Tank Volume (ft3) / (Area ft2 - Tank Displacement ft2)**

= 1067 ft3 / (6300 ft2 - 1206 ft2)

= 0.21 ft

The Bulk Tank Storage Area contains twenty-four ASTs and two blend tanks with secondary containment consisting of a concrete floor with a 1.42 foot concrete dike wall. This tank farm was installed in August 2006.

Drums and totes are stored within Drum/Tote Storage Area #1 and Drum/Tote Storage Area #2. Drum/Tote Storage Area #1 has a concrete floor and a 2 foot dike wall. The Drum/Tote Storage Area #2 has a concrete pad with 6 inch curbing.

All tanks and lines are aboveground.

C – Existing Effluent and Solids Disposal

Hobbs, New Mexico facility does not dispose of any waste on-site. Hobbs does not have an onsite wastewater treatment facility, surface impoundments, oil skimmer pits, emergency pits, shop floor drains, sumps, etc. A full discussion on domestic sewage and the septic system at Hobbs is provided in Section 7. Champion Technologies has contracted Univar, a waste broker, to assist with characterization, transport, and disposal of all non-hazardous and hazardous material. Based upon the materials characterization, Univar will arrange for disposal at an approved disposal location.

The contact information for Univar is provided below.
Univar USA
311 S Lark Avenue
Odessa, Texas 79762

(432) 366-3243

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

The bulk storage tank area and the drum/tote storage area have sufficient secondary containment to exceed the requirements of the SPCC Rule and the New Mexico Discharge Plan requirement of 133% containment of the largest container (calculation provided on Figure 4 and 5). The facility does not have surface impoundments, pits, etc.

A full discussion on domestic sewage and the septic system at Hobbs is provided in Section 7. No modifications to the septic system are anticipated at this time.

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

Daily Inspection
All Champion Technology personnel are trained on spill prevention measures. During their daily activities, prior to starting work for the day and prior to leaving, a visual inspection of their area is performed. If leaks or spills are identified these inspections they are reported and cleaned up immediately as part of good housekeeping practices.

Weekly, Annual, and Periodic Inspections
A written inspection form is completed weekly with a more detailed annual inspection performed per SPCC requirements.

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

See attached SPCC Plan

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

The Hobbs, New Mexico facility is working with the New Mexico Oil Conservation Division as part of an ongoing site investigation. The facility identification number is AP-14. A site map showing the location of monitoring wells in relation to the facility buildings is shown in Figure 5. For site specific geology and hydrology, please refer to the submitted Site Investigation Report dated September 12, 2000 for the Champion Technologies, Inc. at Hobbs, New Mexico. Hydrology section is presented in Appendix B. Additional subsequent reports providing updates and closure on specific chemical of concern (COCs) are also on file with the New Mexico OCD.

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

Water Well
Two non-potable water wells have been drilled at the Hobbs facility. The first well was located on the northwest side of the property and has been plugged and abandoned. A second water well was drilled and provides non-potable water to the facility (i.e. bathrooms). An outside vendor provides drinking water to the facility.

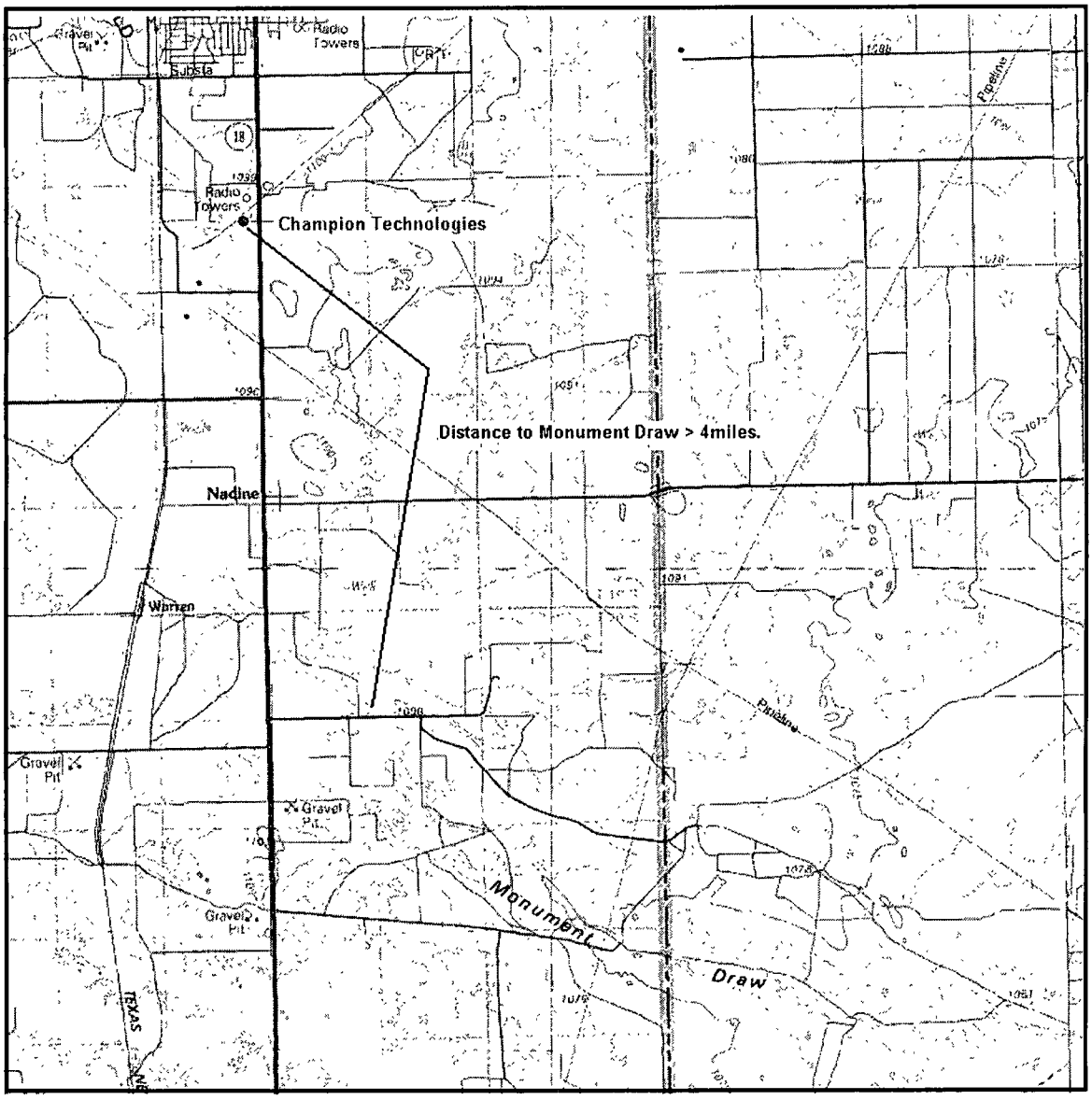
Storm Water Plan

A. All production chemicals are to be kept in secondary containment.
B. Drums/totes are stored on the concrete pad with a six inch curb and speed bump entrance to maintain containment may be stored directly on the ground.
C. The storage areas are visually inspected daily (Monday through Friday) with a written inspection performed weekly and annually.

D. Any leaking pumps, valves, liens, and/or containers are to be repaired immediately. The contaminated secondary containment area must be cleaned [no change].
E. Any transferring of chemicals must be performed inside secondary containment area, if possible [no change].
F. The entire facility to be inspected weekly for leaks or possible leaks.
G. Following a 0.1 inch or greater storm event, secondary containment structures will be inspected to for any visible contamination such as oil sheen or discoloring. If storm water/snow melt accumulation within secondary containment is greater than 2 inches, the water will be pumped out. If there is no visible sign of contamination, the operator will fill out the storm water discharge form (see Table 3) and release the water. If there is any visual sign of contamination including sheen, floating solids, etc. the accumulated storm water/snow melt will be pumped out into a drum or other container. The storm water/snowmelt will be characterized and then sent off-site for disposal based upon its characterization.

Figures

Figure 1 – Site Vicinity Map

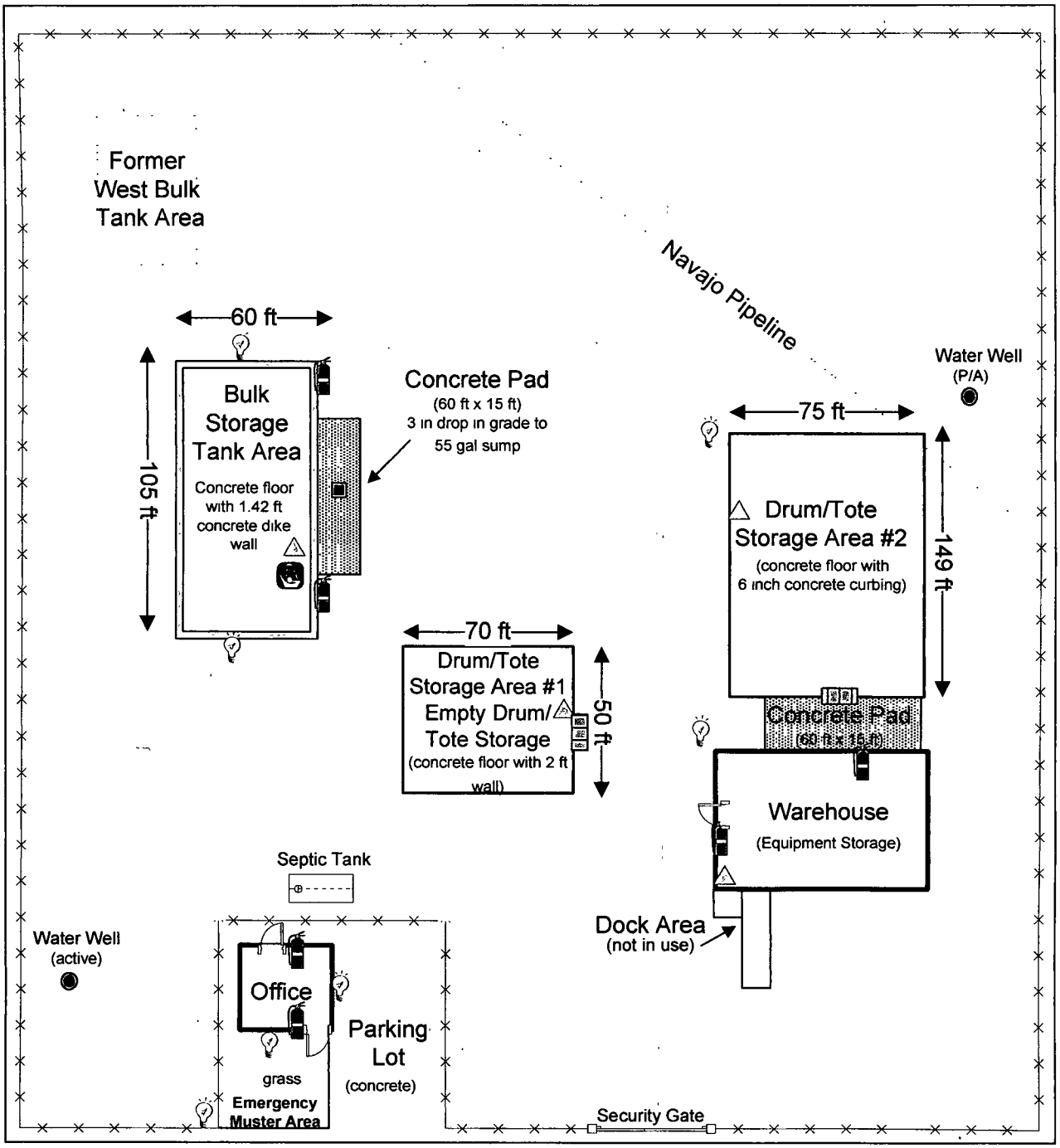


Source: USGS Topographic Map – Hobbs, New Mexico Hobbs, 7/1/1973
(Approx. scale: 1 inch = 8,333 ft).

Figure 2 – Site Aerial Map

Source: Google Earth: Image 2006 Digital Globe

Figure 3 – Site Map
HOBBS, NEW MEXICO



LEGEND

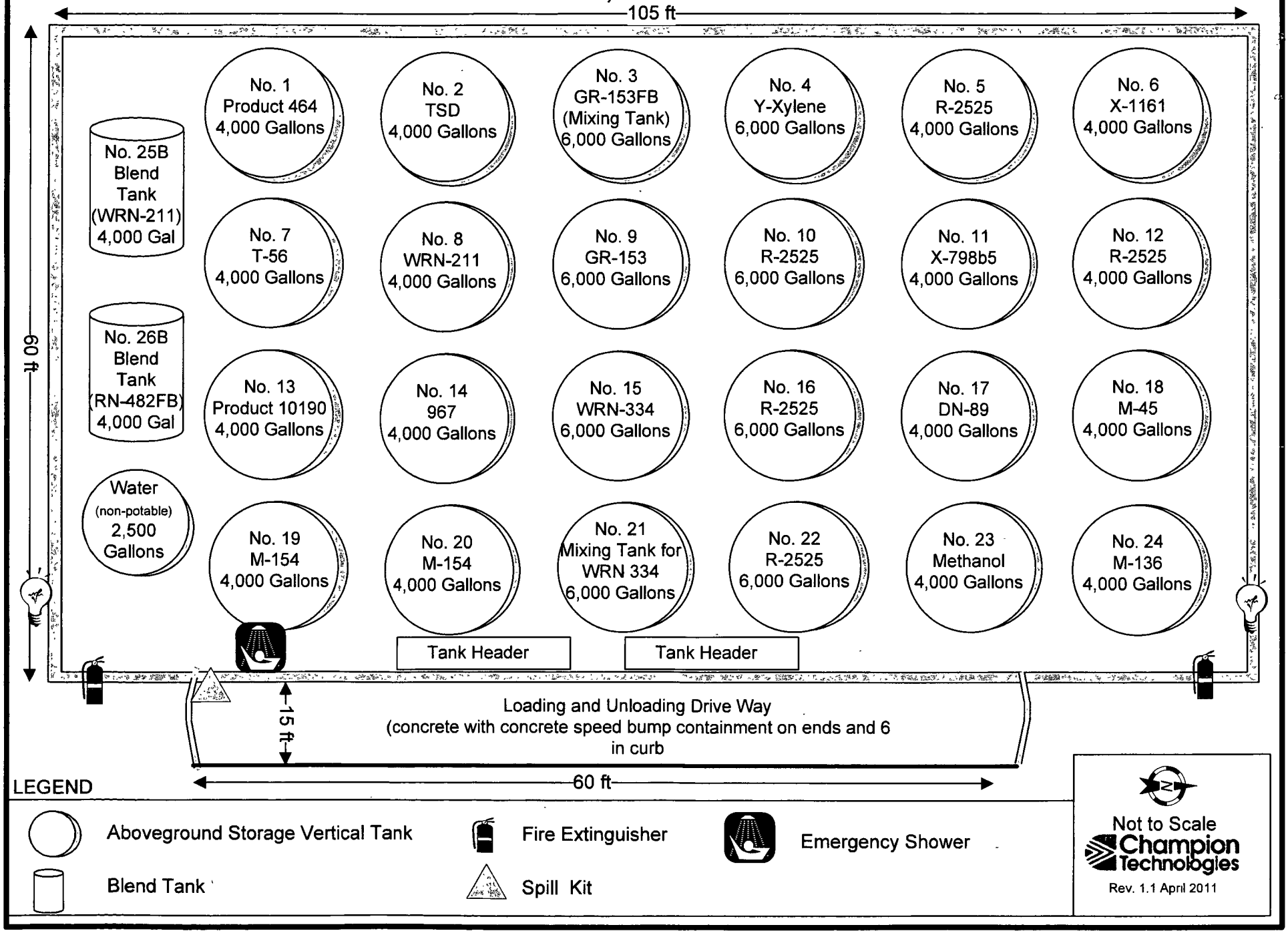
- Emergency Shower
- Property Boundary
- Fence – chain link
- Transfer Area
- Spill Kit
- Pipeline
- Ramp to Containment
- Storm Water Flow Direction
- Lights
- Fire Extinguisher
- Septic Tank
- Water Well
  P/A – Plugged and Abandoned
  Active – In use

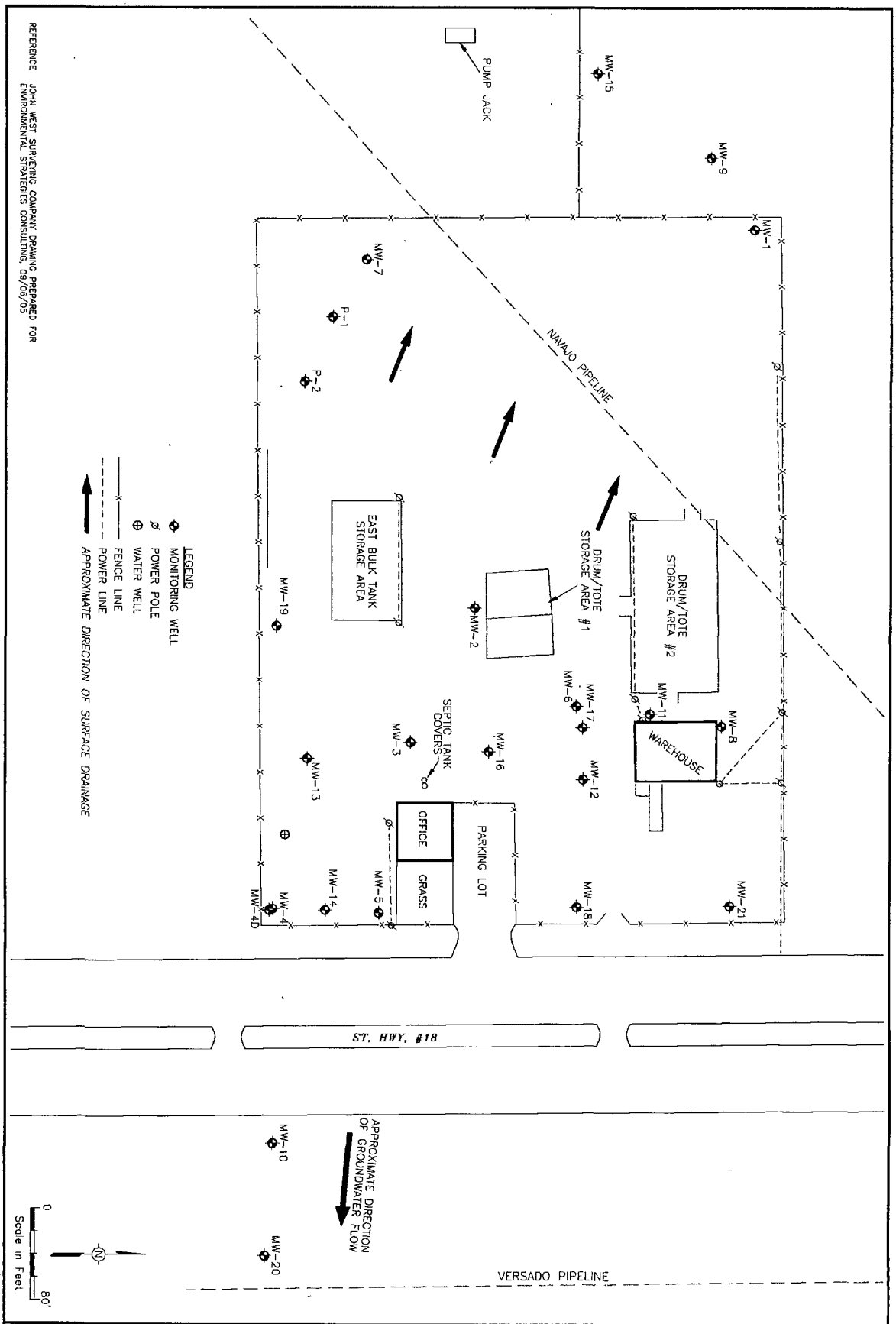
Not to Scale

Champion Technologies

Rev 1 1 April 2011

Figure 4 – Bulk Storage Tank Map
HOBBS, NEW MEXICO





WSP ENVIRONMENTAL STRATEGIES

4600 South Ulster Street Suite 930
Denver, Colorado 80237
(303) 850-9200

Figure 5
Site Plan
Champion Technologies Inc.
Hobbs, New Mexico

1310422LDWG

Tables

Table 1: Product Type and Description

Product Type	Product Description
Cortrons	Corrosion inhibitors for the oilfield that normally consist of imadazolines, amines, fatty acids, and various organic solvents. Sometimes the solvent is water. The organic solvents are usually mixed alcohols or heavy aromatic naphtha's.
Scortrons	Combination scale and corrosion inhibitors that normally consist of the same things found in corrosion with the addition of phosphonates, amides, and bisulfites.
Gyptrons	Scale treating compounds for the oilfield that are used either to prevent scale from forming or removing scale. This line normally consists of products based on water soluble phosphonates either in the neutralized or un-neutralized form.
Elulsotrons	Chemicals for treating oilfield oil and water emulsions. This product line normally consists of surfactants in an organic solvent such as heavy aromatic naphtha.
Flexoils	Paraffin treating for the oilfield. Normally consists of high molecular weight polymers in an organic solvent such as xylenes, toluene or heavy aromatic naphtha.
Flotrons	Paraffin treating compounds for the oilfield that generally consist of surfactants in either aqueous or organic solvents. Solvents for organic blends are heavy aromatic naphtha, xylenes, etc. Aqueous blends consist of water, methanol, and isopropanol as the solvent.
Gas Treat	Amine based chemicals for treating sour gas.
Surfatron	A blend of two or more surfactants that enhance wetting and emulsify or disperse oil, water and solids.
Foamatrons	Blends are similar to the Surfatron chemicals.
Defoamers	Organic solvent based chemicals for preventing or removing foam problems in the oilfield.
Bactrons	Bactericides for treating oilfield corrosion problems. These normally consist of aldehyde or quaternary amines.
Cleartrons	Used for water clarification in the oilfield to remove residual amounts of oil from water. These chemicals normally consist of polymers in aqueous solvents
Xylenes and Han	Oil based hydrocarbons used as solvents in the oilfield chemical treatment mixtures.
Methanol and IPA	Alcohol used as solvents in oilfield treatment mixtures.

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	F	R	Reportable Quantity Driver	Gal	Tank Properties Size (gal)	Material	Orient	Cradle	Radius (ft)
East														
01	Product 464	Corrosion Inhibitor	Water	Methanol - 10-30%	2	3	0	Methanol	2,064	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 60-80%										
02	TSD	Gyptron	Water	Trisodium nitrilotriacetate - 0.1 - 1%	2	3	0	Methanol	2,637	4000	Polytank	Vertical	None	4
				Trisodium EDTA - 1 - 5%										
				Tetrasodium EDTA - 1 - 5%										
				Sodium Hydroxide - 0.1 - 1%										
				Methanol - 10 - 30%										
03	GR-153FB	Scortron	Water	Ammonium Chloride - 1-5%	2	2	0		5,138	6000	Polytank	Vertical	None	4
				2-Butoxyethanol - 1-5%										
				Aromatic amines carboxylate - 1-5%										
				Aromatic amines, acetates - 1-5%										
				Alkyl amine surfactant, phosphate ester salt - 1-5%										
				Alkyl amine surafactant, acetate salt - 1-5%										
				Nonphenol ethoxylate - 1-5%										
				Fatty Amino Compound, Acetic Acid Salt - 1-5%										
				Amine phosphonate 7 - 5-10%										
				Ethylene Glycol - 5-10%										
				Methanol - 10-30%										
04	Xylenes	Raw Material	Oil	Xylenes - 60-80%	2	3	0	Xylenes	13	6000	Polytank	Vertical	None	4
				Ethylbenzene - 10-30%										
05	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
06	X-1161M	Emulsotron	Oil	Naphthalene - 0.1-1.0%	2	3	0	Xylenes		4000	Polytank	Vertical	None	4
				Ethylbenzene - 1-5%										
				Heavy aromatic solvent naphtha - 5-10%										
				Methanol - 30-60%										
				Xylenes - 10-30%										
07	T-56	Gyptron	Water	Methanol - 5 - 10%	1	2	0	Methanol	6,005	4000	Polytank	Vertical	None	4
				Ammonium Chloride - 1 - 5%										
08	WRN-211	Cortron	Water	Methanol - 10 - 30%	3	3	0	Methanol	2,637	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 10 - 30%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Size (gal)	Tank Properties Material	Tank Properties Orient	Cradle	Radius (ft)
East														
09	GR-153FB	Scortron	Water	Ammonium Chloride - 1-5%	2	2	0		5,138	6000	Polytank	Vertical	None	4
				2-Butoxyethanol - 1-5%										
				Aromatic amines carboxylate - 1-5%										
				Aromatic amines, acetates - 1-5%										
				Alkyl amine surfactant, phosphate ester salt - 1-5%										
				Alkyl amine surafactant, acetate salt - 1-5%										
				Nonphenol ethoxylate - 1-5%										
				Fatty Amino Compound, Acetic Acid Salt - 1-5%										
				Amine phosphonate 7 - 5-10%										
				Ethylene Glycol - 5-10%										
				Methanol - 10-30%										
10	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
11	X-798B05	Emulsotron	Oil	Xylene - 5 - 10%	2	3	0	Xylene	237	4000	Polytank	Vertical	None	4
				Toluene - 10 - 30%										
				Petroleum naphtha - 30 - 60%										
				Naphthalene - 0 1 - 1%										
				Naphtha (petroleum), heavy aromatic - 5 - 10%										
				Light aliphatic solvent naphtha - 10 - 30%										
				Ethylbenzene - 1 - 5%										
				Cumene - 1 - 5%										
				1,2,4-Trimethylbenzene - 5 - 10%										
12	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	F	R	Reportable Quantity Driver	Gal	Size (gal)	Tank Properties Material	Orient	Cradle	Radius (ft)
East														
13	Product 10190	Corrosion Inhibitor		Acetic Acid - 1-5%	3	2	0	Methanol	8,710	4000	Polytank	Vertical	None	4
				2-Mercaptoethanol - 1-5%										
				Methanol - 5-10%										
				Ionic Surfactants - 10-30%										
				Fatty Amino Compound Acetate - 10-30%										
14	967	Corrosion Inhibitor	Water	Distillates (petroleum), solvent-dewaxed heavy paraffinic - 0 1 - 1%	2	1	0	Acetic Acid	12,009	4000	Polytank	Vertical	None	4
				Cationic Condensate - 0 1 - 1%										
				Alkyl Amine Surfactant, Phosphate Ester Salt - 10 - 30%										
				Alkyl amine surfactant, acetate salt - 10 - 30%										
				Alkyl Amine Surfactant - 1 - 5%										
				2-Butoxyethanol - 5 - 10%										
15	WRN-334	Cortron	Water	Alkyl Amine Surfactant - 1 - 5%	1	1	0	Naphthalene	4,515	6000	Polytank	Vertical	None	4
				Acetic acid - 0 1 - 1%										
				2-Butoxyethanol - 1 - 5%										
16	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
17	DN-89	Surfatron	Oil	Xylene - 0 1 - 1%	2	3	0	Toluene	291	4000	Polytank	Vertical	None	4
				Toluene - 30 - 60%										
				Petroleum naphtha - 10 - 30%										
				Light aromatic solvent naphtha - 10 - 30%										
				Light aliphatic solvent naphtha - 30 - 60%										
				Diethylbenzene - 0 1 - 1%										
				Cumene - 0 1 - 1%										
				Benzenesulfonic acid, dodecyl-, branched, compd. with ethanolamine - 5 - 10%										
				2-Propanol - 1 - 5%										
				1,3,5-Trimethylbenzene - 1 - 5%										
				1,2,4-Trimethylbenzene - 5 - 10%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Size (gal)	Tank Properties Material	Tank Properties Orient	Cradle	Radius (ft)
East														
18	M-45	Flotron	Oil	Toluene - 30 - 60% Light aliphatic solvent naphtha - 30 - 60%	2	3	0	Toluene	218	4000	Polytank	Vertical	None	4
19	M-154	Flotron	Oil	Toluene - 60 - 80% Sulfunc acid - 0 1 - 1% Light aliphatic solvent naphtha - 10 - 30% Benzenesulfonic acid, dodecyl-, branched - 1 - 5% Alkylbenzene sulfonic acid - 5 - 10%	3	3	1	Toluene	185	4000	Polytank	Vertical	None	4
20	M-154	Flotron	Oil	Toluene - 60 - 80% Sulfuric acid - 0.1 - 1% Light aliphatic solvent naphtha - 10 - 30% Benzenesulfonic acid, dodecyl-, branched - 1 - 5% Alkylbenzene sulfonic acid - 5 - 10%	3	3	1	Toluene	185	4000	Polytank	Vertical	None	4
21	WRN-334	Cortron	Water	Alkyl Amine Surfactant - 1 - 5% Acetic acid - 0 1 - 1% 2-Butoxyethanol - 1 - 5%	1	1	0	Naphthalene	4,515	6000	Polytank	Vertical	None	4
22	R-2525	Cortron	Oil	Methanol - 10 - 30% Ionic Surfactants - 1 - 5% High Boiling Distillation Residue - 60 - 80% Fatty Amino Compound - 1 - 5%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
23	Methanol	Raw Material	Water	Methanol - 80 - 100%	1	3	0	Methanol	750	4000	Polytank	Vertical	None	4
24	M-136	Flotron	Oil	Xylene - 30 - 60% Toluene - 10 - 30% Light aliphatic solvent naphtha - 30 - 60% Ethylbenzene - 5 - 10%	2	3	0	Xylene	35	4000	Polytank	Vertical	None	4
25B	Blend Tank	Blend Tank		Process Tank - See Blend Sheet - %						4000	Fiberglass	Vertical	None	10
26B	Blend Tank	Blend Tank		Process Tank - See Blend Sheet - %						4000	Fiberglass	Vertical	None	10

Table 3: Dike Drainage Discharge Form

Hobbs, New Mexico

Fill out a separate form for each sample collected and prior to water release. This is performed to ensure no water is released that has the potential to cause harm to persons, property, and the environment.

Fill out or Circle Each That Apply		
Person Collecting/Examining Sample:		
Discharge Location:		
Date and Time Collected and Examined:		
Rainfall Amount:		
Parameter	Parameter Description	Parameter Characteristics
Color	Is the water colored? **Yes No**	Describe If Necessary:
Clarity	Is the water clear or transparent? Can you see through it? **Yes No**	Which of the following best describes the water clarity? **Clear Milky Opaque**
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? **Yes No**	Which of the following best describes the water sheen? **Oily Silver Iridescent**
Odor	Does the sample have an odor? **Yes No**	Describe If Necessary:
Floating Solids	Is there something floating on the surface of the sample? **Yes No**	Describe If Necessary:
Suspended Solids	Is anything suspended in the sample? **Yes No**	Describe If Necessary:
Settled Solids	Is there something settled at the bottom of the sample? **Yes No**	Describe If Necessary:
Foam	Is there foam or material forming on top of the water **Yes No**	Describe If Necessary:
Detail any concerns or if any corrective actions were taken:		
Collector's Signature and Date:		

Appendix A

CHAMPION TECHNOLOGIES™

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN

WESTERN REGION
HOBBS DISTRICT
HOBBS DISTRIBUTION FACILITY

Prepared by:

HSE Department
Champion Technologies, Inc.
Suite 2700
3200 Southwest Freeway
Houston, Texas 77027

April 18, 2011

Executive Summary

- The Hobbs facility is a bulk distribution center for oil-based chemicals and oils used for down-hole treatment of oil and gas wells in New Mexico (see Figures 1 & 2). Total oil storage on the site is anticipated to be less than 80,000 gallons at any given time; (see Table 2 and Appendix I). A schematic diagram of the site layout is given in Figure 3 and 4.

- The oil-based chemicals and oils stored at this facility are generally hazardous in nature. Consult Champion's MSDS sheets (maintained in the facility office) and safe product handling procedures (referenced in Appendix B of this document) for critical information necessary for the protection of worker health and safety.

- Key operational components of this SPCC Plan include the following:
    - **Employees are to be trained in the proper and safe handling of the oils and oil-based chemicals handled and stored at this facility.** This training is to occur prior to facility entry for new employees and on an annual basis for existing employees. Records of this training are to be kept onsite.
    - Site security is facilitated through access control (fencing and gates) and lighting. These measures are to be inspected on an on-going basis as part of routine work procedures.
    - Facilities and tanks are to be visually inspected on a weekly basis with a more detailed inspection performed annually. Records of these inspections are kept on file at the facility's filing area for a minimum of three years.
    - Hobbs only stores oil soluble product in portable containers which are approved for transport under DOT requirements. As a result no other mechanical and/or material integrity testing is required.
    - Polytanks of 500 gallon capacity or greater will be tested via hydro testing, dye-penetration, or hammer test by a qualified professional on at least a 10 year frequency. A general procedure for hydro testing is provided in Appendix J.
    - Uncontaminated rainwater which has accumulated within secondary containment structures (berms) may be drained from the facilities. Records of these drainage events will be recorded on the form provided in this SPCC plan provided in Appendix H. The records will be maintained onsite for a minimum of three years.
    - **Spills and contaminated rainwater are to be treated with the utmost regard for human health and safety**, following the spill response procedures given in Appendix F.

SPCC Plan Outline

Figures

Tables

1.0 Purpose and Scope of SPCC Plan

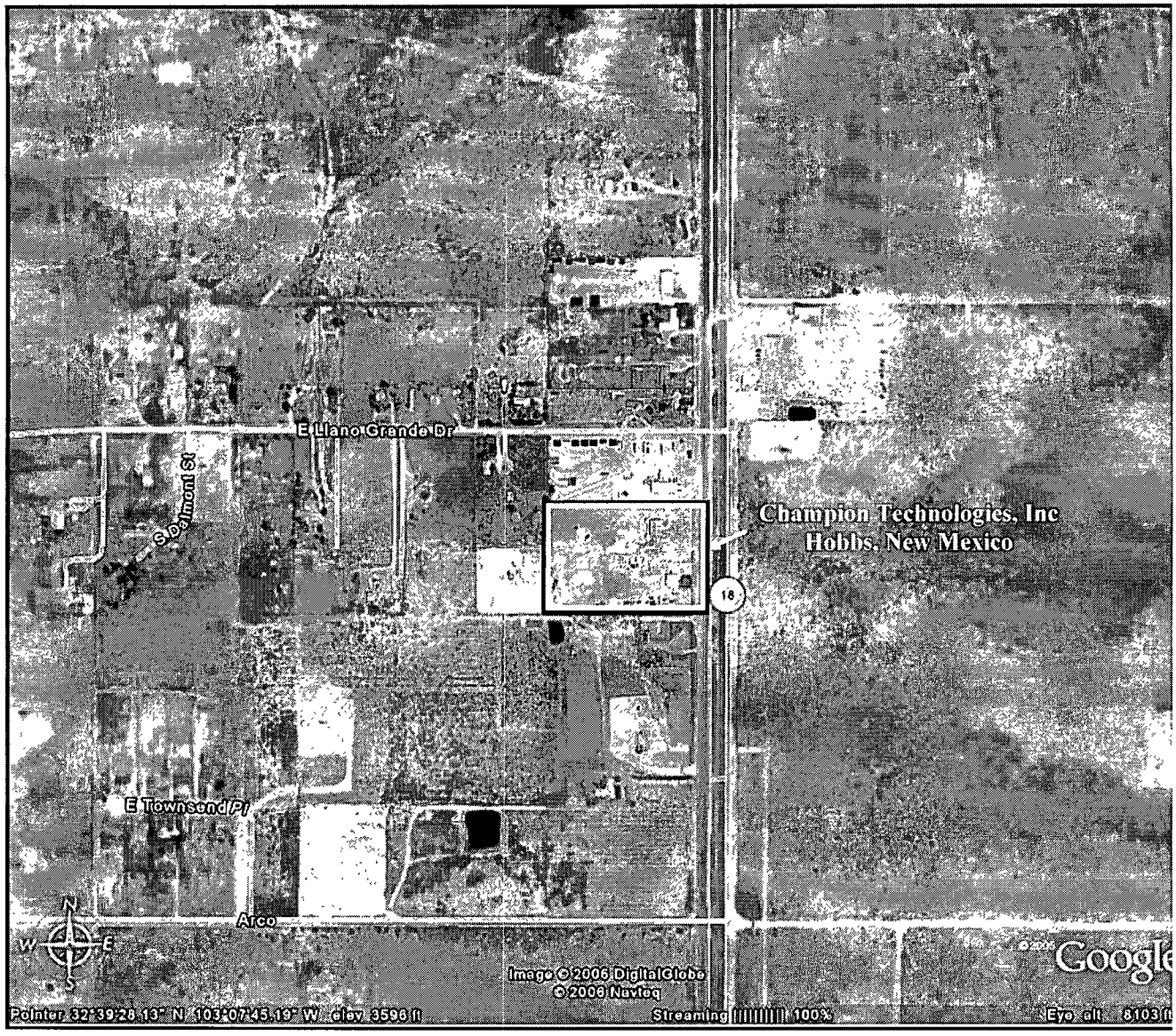
The purpose of an SPCC plan is to protect "navigable waters of the United States" from oil spills per U.S. Environmental Protection Agency rules (40 CFR 112) under the "Clean Water Act". These rules establish requirements for contingency planning, implementation of operating procedures, and best management practices to prevent and control the discharge of oil to these surface waters. It is generally understood that SPCC regulations apply to "surface" water contamination, where the movement of spilled oil to the receiving body of water is typically rapid. A central feature of SPCC plans is to provide sufficient "secondary containment" to contain and to prevent spills from reaching navigable waters before effective response actions can be taken.

In contrast, the spillage of oil and the resulting potential contamination of groundwater is typically a slow process. The protection of groundwater resources is generally covered under a separate authority such as the Resource Conservation and Recovery Act (RCRA) or The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and is not addressed in this plan.

The scope of an SPCC plan will therefore address the potential for spilled oil to reach navigable (surface) waters of the United States. Measures intended to protect soils and groundwater are not the subject of SPCC regulations (excepting, perhaps, where the pathway of travel from the surface, through the groundwater to the navigable water is short and the rate of oil movement is rapid). Thus, some flexibility is afforded as to the means of secondary containment specified in an SPCC plan.

2.0 Facility Description and Operations Summary

This facility is a bulk distribution center for oils and oil-based chemicals (subsequently referred to as "oil" or "oils") used for down-hole treatment of oil and gas wells in New Mexico. The Hobbs Facility is located at 4001 South Highway 18, Hobbs, New Mexico, 88240. This facility receives, stores, and distributes blended water and oil-based chemicals for servicing oil and gas wells. The Hobbs facility opened in 1970. Champion Technologies' headquarters is located at 3200 Southwest Freeway, Suite 2700, Houston, Texas 77027.



Source: Google Earth: Image 2006 Digital Globe
Figure 1: Site Vicinity Map

3.0 SPCC Applicability Determination

Based on requirements specified in 40 CFR 112.1, a facility is subject to the SPCC rule if it meets the following three criteria:

1. is non-transportation related;
2. has an aggregate aboveground oil storage capacity greater than 1,320 gallons or a completely buried oil storage capacity greater than 42,000 gallons; and

3. there must be a reasonable expectation of a discharge into or upon navigable waters of the United States or adjoining shorelines.

Champion's Hobbs distribution facility meets the first two criteria. However, as this facility is over four (4) miles from the nearest ephemeral drainageway (Monument Draw, which is not itself a navigable water), it almost certainly does not meet the third criterion; (see Figure 3). While there is a small man-made pond used to provide water to cattle is located approximately 40 feet southwest of the facility property line, the facility grounds does not slope towards this pond (slope is to the west) and thus it is unlikely that a release from the facility would impact the pond. However, Champion has decided to prepare and to implement an SPCC plan at its own discretion, to protect its own and adjacent properties from oil spillage.

Closest Surface Water: Monument Draw
Direction: South-southwest
Distance: > 4 miles

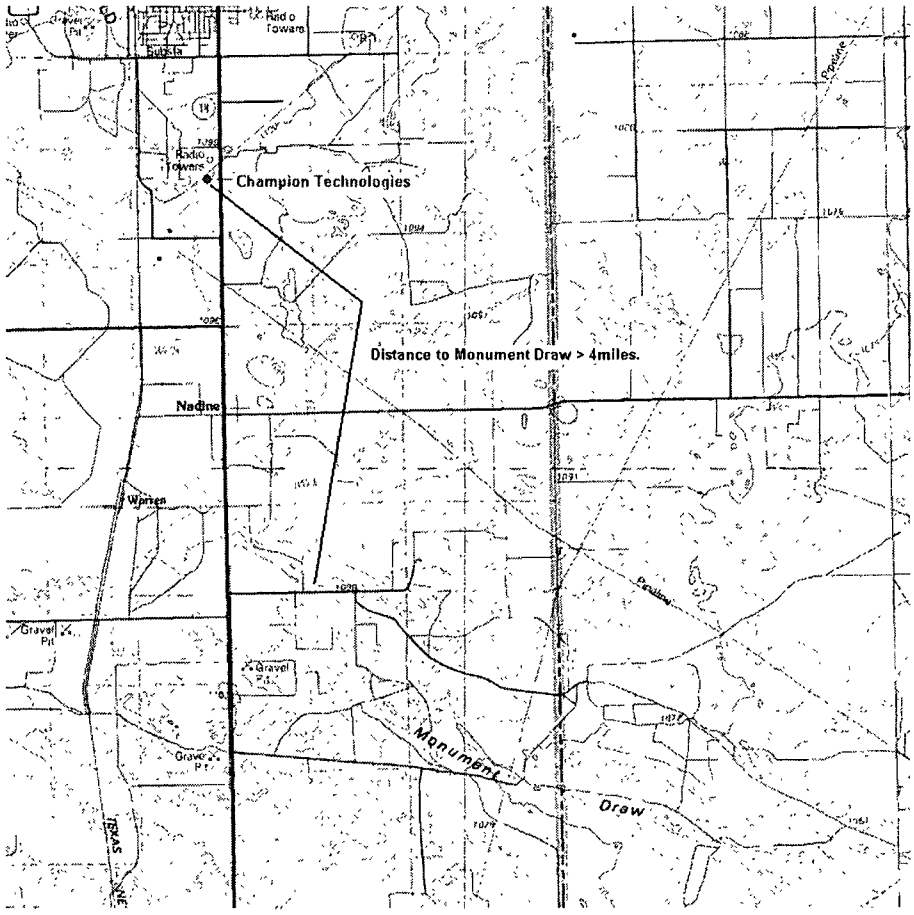


Figure 2: Off-Site Water Drainage

4.0 Oil Storage Facilities

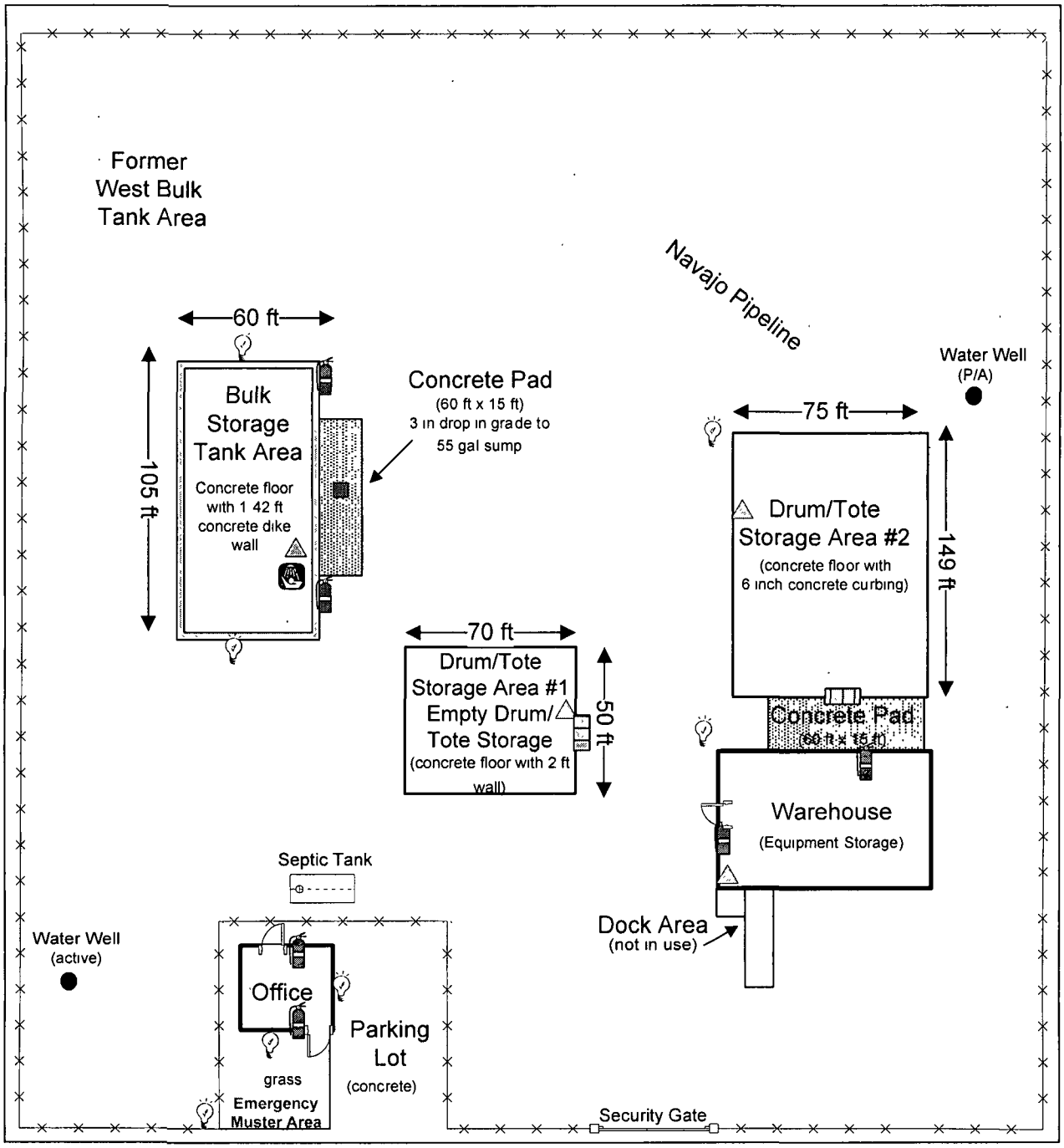
The SPCC Rule applies to facilities with the potential to discharge "oil" in quantities that may be harmful to navigable waters and/or adjoining shorelines. Oil is defined by the SPCC Rule, 40 CFR §112.2 as:

> Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

A list of substances which are considered to meet the definition of oil according to the U.S. Coast Guard is available at https://homeport.uscg.mil/mycg/portal/ep/contentDetailViewPopup.do?BV_SessionID=@@@@0790744388.1299174386@@@@&BV_EngineID=ccccademmejjmggcfjgcfgfdffhdghm.0&fromSearch=yes&contentType=EDITORIAL&contentId=120944. Per EPA guidance, Champion Technologies has chosen to classify products that are oil soluble as an oil in addition to those oils listed specifically in 40 CFR §112.2 and on the Coast Guard's list.

The SPCC Rule applies to a facility that has more than 1,320 gallons of aggregate aboveground oil storage capacity or more than 42,000 gallons of completely buried oil storage capacity. When determining oil storage capacity, all containers of oil with a capacity of 55 gallons or greater will be included in the calculation. A list of all tanks with their contents, storage capacity, and applicability to the SPCC Rule is provided in Table 2. A general description of the type of products stored onsite is provided in Table 1 and a list of the portable container storage is provided in Appendix I.

Figure 3 – Site Map
HOBBS, NEW MEXICO



LEGEND

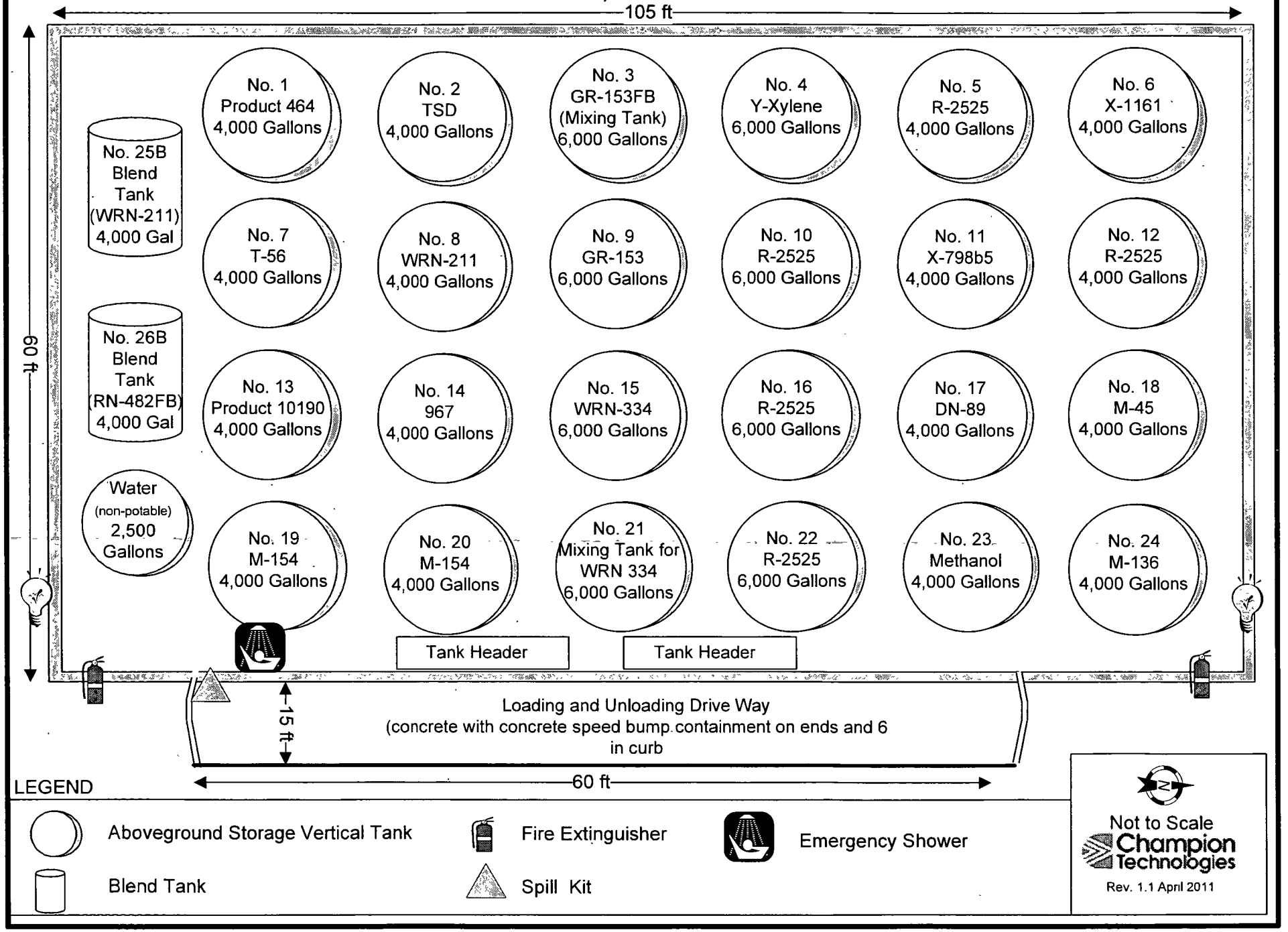
Emergency Shower	Spill Kit	Lights	
Property Boundary	Pipeline	Fire Extinguisher	
Fence – chain link	Ramp to Containment	Septic Tank	
Transfer Area	Storm Water Flow Direction	Water Well P/A – Plugged and Abandoned Active – In use	

Not to Scale

Champion Technologies

Rev 1.1 April 2011

Figure 4 – Bulk Storage Tank Map
HOBBS, NEW MEXICO



5.0 Potential for Spillage and Secondary Containment

The Hobbs facility encompasses an area of approximately 7 acres. The Hobbs facility consists of one office building, one warehouse, one bulk storage tank area, one loading/unloading area, and two portable container areas. Below is a discussion on each of these areas with respect to SPCC Rule and secondary containment.

The Hobbs facility stores both water soluble and oil soluble products in aboveground storage tanks and portable containers (totes/drums). There are two blend vessels that are dedicated to blending water soluble products. Below is a summary of chemical storage at the Hobbs facility (see Table 2 and Appendix I): and a description of Champion Technologies' fourteen product lines is included in Table 1:

	Water Soluble Chemical (gal)	Oil Storage (gal)
Bulk Storage Tanks[1]	52,000	60,000
Drums / Totes (average)	43,000	8,000
Total	95,000	68,000

[1] Bulk storage tanks are shell capacity.

5.1 Bulk Storage Tanks

The Hobbs facility has 13 oil storage tanks ranging in capacity from 4,000 – 6,000 gallons. All 13 tanks are polytanks. The secondary containment structure has a concrete floor and concrete diked walls. The floor and walls of the containment dike are constructed of poured concrete reinforced with steel. The storage tank area has sufficient secondary containment to exceed the requirements in the Spill Prevention, Control, and Countermeasure (SPCC) Rule and the New Mexico Discharge Plan requirement of 133% containment of the largest tank. The calculation for the secondary containment is provided below:

	Width (ft)	X	Length (ft)	=	Area (ft2)
Containment Area Dimensions:	105		60		6300

Dike Height (ft): 1.42 Tank Footprint/Displacement (ft2): 1206

Largest Tank within Containment: 6000 gal or 802.13 ft3

Net Volume: Dike Height X (Containment Area ft2 - Tank Displacement ft2)

= 1.42 ft X (6300 ft2 - 1206 ft2)

= 7234 ft3 or 54109 gal

Freeboard Calculation:

New Mexico: 133% Capacity of Largest Tank

Min. Berm Height for 133% Largest Tank:

= 133% Tank Volume (ft3) / (Area ft2 - Tank Displacement ft2)

= 1067 ft3 / (6300 ft2 - 1206 ft2)

= 0.21 ft

Table 1 Product Type and Description

Product Type	Oil	Product Description
Cortrons	Approx. 1/3 are Oil-Based.	Corrosion inhibitors for the oilfield that normally consist of imadazolines, amines, fatty acids, and various organic solvents. Sometimes the solvent is water. The organic solvents are usually mixed alcohols or heavy aromatic naphthas.
Scortrons	Predominately Water-Based	Combination scale and corrosion inhibitors that normally consist of the same things found in corrosion with the addition of phosphonates, amides, and bisulfites.
Gyptrons	Predominately Water-Based	Scale treating compounds for the oilfield that are used either to prevent scale from forming or removing scale. This line normally consists of products based on water-soluble phosphonates either in the neutralized or un-neutralized form.
Elulsotrons	Predominately Oil-Based	Chemicals for treating oilfield oil and water emulsions. This product line normally consists of surfactants in an organic solvent such as heavy aromatic naphtha.
Flexoils	Predominately Oil-Based	Paraffin treating for the oilfield. Normally consists of high molecular weight polymers in an organic solvent such as xylenes, toluene or heavy aromatic naphtha.
Flotrons	Predominately Water-Based	Paraffin treating compounds for the oilfield that generally consist of surfactants in either aqueous or organic solvents. Solvents for organic blends are heavy aromatic naphtha, xylenes, etc. Aqueous blends consist of water, methanol, and isopropanol as the solvent.
Gas Treat	Predominately Water-Based	Amine based chemicals for treating sour gas.
Surfatron	50/50 Water/Oil-Based	A blend of two or more surfactants that enhance wetting and emulsify or disperse oil, water and solids.
Foamatrons	Predominately Water-Based	Blends are similar to the Surfatron chemicals.
Defoamers	Approx. ¼ are Oil-Based	Organic solvent-based chemicals for preventing or removing foam problems in the oilfield.
Bactrons	Predominately Water-Based	Bactericides for treating oilfield corrosion problems. These normally consist of aldehyde or quaternary amines.
Cleartrons	Predominately Water-Based	Used for water clarification in the oilfield to remove residual amounts of oil from water. These chemicals normally consist of polymers in aqueous solvents.
Xylenes and Han	Predominately Oil-Based	Oil-based hydrocarbons used as solvents in the oilfield chemical treatment mixtures.
Methanol and IPA	Predominately Water-Based	Alcohol used as solvents in oilfield treatment mixtures.

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Tank Properties Size (gal)	Tank Properties Material	Tank Properties Orient	Tank Properties Cradle	Tank Properties Radius (ft)
East														
01	Product 464	Corrosion Inhibitor	Water	Methanol - 10-30%	2	3	0	Methanol	2,064	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 60-80%										
02	TSD	Gyptron	Water	Trisodium nitrilotriacetate - 0.1 - 1%	2	3	0	Methanol	2,637	4000	Polytank	Vertical	None	4
				Trisodium EDTA - 1 - 5%										
				Tetrasodium EDTA - 1 - 5%										
				Sodium Hydroxide - 0.1 - 1%										
				Methanol - 10 - 30%										
03	GR-153FB	Scortron	Water	Ammonium Chloride - 1-5%	2	2	0		5,138	6000	Polytank	Vertical	None	4
				2-Butoxyethanol - 1-5%										
				Aromatic amines carboxylate - 1-5%										
				Aromatic amines, acetates - 1-5%										
				Alkyl amine surfactant, phosphate ester salt - 1-5%										
				Alkyl amine surafactant, acetate salt - 1-5%										
				Nonphenol ethoxylate - 1-5%										
				Fatty Amino Compound, Acetic Acid Salt - 1-5%										
				Amine phosphonate 7 - 5-10%										
				Ethylene Glycol - 5-10%										
				Methanol - 10-30%										
04	Xylenes	Raw Material	Oil	Xylenes - 60-80%	2	3	0	Xylenes	13	6000	Polytank	Vertical	None	4
				Ethylbenzene - 10-30%										
05	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
06	X-1161M	Emulsotron	Oil	Naphthalene - 0.1-1.0%	2	3	0	Xylenes		4000	Polytank	Vertical	None	4
				Ethylbenzene - 1-5%										
				Heavy aromatic solvent naphtha - 5-10%										
				Methanol - 30-60%										
				Xylenes - 10-30%										
07	T-56	Gyptron	Water	Methanol - 5 - 10%	1	2	0	Methanol	6,005	4000	Polytank	Vertical	None	4
				Ammonium Chloride - 1 - 5%										
08	WRN-211	Cortron	Water	Methanol - 10 - 30%	3	3	0	Methanol	2,637	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 10 - 30%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Tank Properties Size (gal)	Tank Properties Material	Tank Properties Orient	Tank Properties Cradle	Tank Properties Radius (ft)
East														
09	GR-153FB	Scortron	Water	Ammonium Chloride - 1-5%	2	2	0		5,138	6000	Polytank	Vertical	None	4
				2-Butoxyethanol - 1-5%										
				Aromatic amines carboxylate - 1-5%										
				Aromatic amines, acetates - 1-5%										
				Alkyl amine surfactant, phosphate ester salt - 1-5%										
				Alkyl amine surafactant, acetate salt - 1-5%										
				Nonphenol ethoxylate - 1-5%										
				Fatty Amino Compound, Acetic Acid Salt - 1-5%										
				Amine phosphonate 7 - 5-10%										
				Ethylene Glycol - 5-10%										
				Methanol - 10-30%										
10	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
11	X-798B05	Emulsotron	Oil	Xylene - 5 - 10%	2	3	0	Xylene	237	4000	Polytank	Vertical	None	4
				Toluene - 10 - 30%										
				Petroleum naphtha - 30 - 60%										
				Naphthalene - 0.1 - 1%										
				Naphtha (petroleum), heavy aromatic - 5 - 10%										
				Light aliphatic solvent naphtha - 10 - 30%										
				Ethylbenzene - 1 - 5%										
				Cumene - 1 - 5%										
				1,2,4-Trimethylbenzene - 5 - 10%										
12	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	4000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Tank Properties Size (gal)	Tank Properties Material	Tank Properties Orient	Tank Properties Cradle	Tank Properties Radius (ft)
East														
13	Product 10190	Corrosion Inhibitor		Acetic Acid - 1-5%	3	2	0	Methanol	8,710	4000	Polytank	Vertical	None	4
				2-Mercaptoethanol - 1-5%										
				Methanol - 5-10%										
				Ionic Surfactants - 10-30%										
				Fatty Amino Compound Acetate - 10-30%										
14	967	Corrosion Inhibitor	Water	Distillates (petroleum), solvent-dewaxed heavy paraffinic - 0.1 - 1%	2	1	0	Acetic Acid	12,009	4000	Polytank	Vertical	None	4
				Cationic Condensate - 0.1 - 1%										
				Alkyl Amine Surfactant, Phosphate Ester Salt - 10 - 30%										
				Alkyl amine surfactant, acetate salt - 10 - 30%										
				Alkyl Amine Surfactant - 1 - 5%										
				2-Butoxyethanol - 5 - 10%										
15	WRN-334	Cortron	Water	Alkyl Amine Surfactant - 1 - 5%	1	1	0	Naphthalene	4,515	6000	Polytank	Vertical	None	4
				Acetic acid - 0.1 - 1%										
				2-Butoxyethanol - 1 - 5%										
16	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
17	DN-89	Surfatron	Oil	Xylene - 0.1 - 1%	2	3	0	Toluene	291	4000	Polytank	Vertical	None	4
				Toluene - 30 - 60%										
				Petroleum naphtha - 10 - 30%										
				Light aromatic solvent naphtha - 10 - 30%										
				Light aliphatic solvent naphtha - 30 - 60%										
				Diethylbenzene - 0.1 - 1%										
				Cumene - 0.1 - 1%										
				Benzenesulfonic acid, dodecyl-, branched, compd. with ethanolamine - 5 - 10%										
				2-Propanol - 1 - 5%										
				1,3,5-Trimethylbenzene - 1 - 5%										
				1,2,4-Trimethylbenzene - 5 - 10%										

Table 2: Aboveground Storage Tank Summary for Hobbs

Tank ID	Product	Type	Oil	Hazardous Constituent	Hazard Rating H	Hazard Rating F	Hazard Rating R	Reportable Quantity Driver	Reportable Quantity Gal	Tank Properties Size (gal)	Tank Properties Material	Tank Properties Orient	Tank Properties Cradle	Tank Properties Radius (ft)
East														
18	M-45	Flotron	Oil	Toluene - 30 - 60%	2	3	0	Toluene	218	4000	Polytank	Vertical	None	4
				Light aliphatic solvent naphtha - 30 - 60%										
19	M-154	Flotron	Oil	Toluene - 60 - 80%	3	3	1	Toluene	185	4000	Polytank	Vertical	None	4
				Sulfuric acid - 0.1 - 1%										
				Light aliphatic solvent naphtha - 10 - 30%										
				Benzenesulfonic acid, dodecyl-, branched - 1 - 5%										
				Alkylbenzene sulfonic acid - 5 - 10%										
20	M-154	Flotron	Oil	Toluene - 60 - 80%	3	3	1	Toluene	185	4000	Polytank	Vertical	None	4
				Sulfuric acid - 0.1 - 1%										
				Light aliphatic solvent naphtha - 10 - 30%										
				Benzenesulfonic acid, dodecyl-, branched - 1 - 5%										
				Alkylbenzene sulfonic acid - 5 - 10%										
21	WRN-334	Cortron	Water	Alkyl Amine Surfactant - 1 - 5%	1	1	0	Naphthalene	4,515	6000	Polytank	Vertical	None	4
				Acetic acid - 0.1 - 1%										
				2-Butoxyethanol - 1 - 5%										
22	R-2525	Cortron	Oil	Methanol - 10 - 30%	2	3	0	Methanol	5,923	6000	Polytank	Vertical	None	4
				Ionic Surfactants - 1 - 5%										
				High Boiling Distillation Residue - 60 - 80%										
				Fatty Amino Compound - 1 - 5%										
23	Methanol	Raw Material	Water	Methanol - 80 - 100%	1	3	0	Methanol	750	4000	Polytank	Vertical	None	4
24	M-136	Flotron	Oil	Xylene - 30 - 60%	2	3	0	Xylene	35	4000	Polytank	Vertical	None	4
				Toluene - 10 - 30%										
				Light aliphatic solvent naphtha - 30 - 60%										
				Ethylbenzene - 5 - 10%										
25B	Blend Tank	Blend Tank		Process Tank - See Blend Sheet - %						4000	Fiberglass	Vertical	None	10
26B	Blend Tank	Blend Tank		Process Tank - See Blend Sheet - %						4000	Fiberglass	Vertical	None	10

5.2 Bulk Storage Tanks – Loading Area

The Hobbs facility has a 60 ft x 15 ft bulk chemical transfer area which is sloped towards the center of the pad which has one 2 ft x 2ft x 2ft sump (55 gallons). The drop in grade to the sump is 3 inches.

Volume of transfer area = volume of a pyramid
= 1/3 x length x height x base
= 1/3 x 60 ft x 15 ft x 0.25 ft
= 74 ft3 or 555 gallons (1 ft3 = 7.48 gal)
= volume plus 55 gallon sump = 605 gallons

During the loading/unloading process an attendant is present at the transfer area throughout the operation as described in Appendix B. Below is a summary of the loading/unloading operation:

- The bulk chemical truck loads or unloads at a rate of 150 gallons per minute
- The bulk chemical truck is a bottom loader.
- The most likely discharge scenario would be a ruptured hose connection at either the pump (manifold) or at the truck/hose connection.
- All chemical trucks are equipped with a shutoff valve that is accessible to the attendant.
- The assumption is that the discharge will not impede the attendant's access to the shutoff valve (located on the side of the truck) and that the attendant can successfully close the valve within 30 seconds of the hose connection. Based upon training, it is likely that the valve could be turned off within 15 seconds. The 30 seconds is based upon a conservative estimate of the response time.

The maximum reasonably expected discharge would be 75 gallons
[(150 gallons per minute) x (1 min/60 sec) x (30 sec)]

Based upon the calculation above, 75 gallons could easily be contained within the loading area. A spill kit is located adjacent to the transfer area in the event of a release.

The Bulk Chemical Transfer Area is equipped with two header systems which are equipped with a trough system to capture minor drips and leaks. All tank connecting pipelines are aboveground and are located within the concrete secondary containment dike on a concrete floor. The header system does not meet the EPA definition of a loading rack.

5.3 Portable Container Storage

Drums and totes are stored within Drum/Tote Storage Area #1 and Drum/Tote Storage Area #2. Drum/Tote Storage Area #1 has a 70 ft x 50 ft concrete pad with a 2 foot dike wall. The Drum/Tote Storage Area #2 has a 149 ft x 75 ft concrete pad with 6 inch

curbing. Both areas are more than sufficient to contain a release from the largest portable container, 550 gallons.

5.4 Treater Truck Container Storage

Champion's Hobbs facility operates 4-6 treater trucks which are filled on-site in the early morning and then leave in the early morning for delivery. Chemical stored in the compartments (maximum compartment size is 55 gallons) is generally pumped out during the day's delivery. The compartments on the treater trucks are empty overnight. Oils are loaded in the morning. As a result, treater trucks are not covered by the SPCC Rule.

Prior to leaving and upon return from the field, per DOT regulations, the operator of the treater truck performs a visual inspection to verify that all valves are closed and that the vehicle is in good working order. This inspection minimizes the potential for a spill. Treater trucks are loaded in the morning prior to performing deliveries.

5.5 Accumulated Storm Water

Accumulated precipitation in the secondary containment structures must meet all criteria identified on the Dike Drainage Form and as described in Section 6.4 Drainage of Uncontaminated Rainwater in order to be discharged from the site. Contaminated storm water (does not meet criteria) must be pumped out by an outside vendor for disposal. Prior to discharging water or pumping out accumulated precipitation, the dike drainage form must be filled out and the original maintained onsite for 3 years (applies to both contaminated and uncontaminated accumulated precipitation).

5.6 Security

Site Access Control

The perimeter of the Hobbs facility is completely fenced, and access is controlled by two locked gates that provides access to the facility.

Facility Lighting

Hobbs operates from 6 a.m. to 6 p.m. Monday through Friday and therefore the facility is equipped with adequate outdoor lighting to allow for the discovery of discharges occurring during hours of darkness, both by operating personnel and by non-operating personnel (general public).

The facility is equipped with lights in both the yard and tank farms as shown on Figure 3. This lighting is sufficient for all areas where oil is stored, loaded, or unloaded and is adequate to detect spills at night. Flashlights are available for response actions and inspections in dimly lit storage areas to supplement the outdoor lighting.

Responsible Product Transfer and Handling Procedures

Proper oil handling and transfer procedures are described in Appendix B.

6.0 Facility and Tank Inspection

Champion will train all oil handling personnel such that they will be conscious of the conditions that could cause spills. This awareness will allow personnel to identify and rectify those conditions during the course of their day-to-day operations. Any visual leaks identified will be repaired promptly and/or reported to the area supervisor and any oil accumulation removed.

As a Best Management Practice and internal Champion policy, inspection of all storage tanks and material storage areas, piping, valves and appurtenances, and related equipment will be conducted by facility personnel to detect any leaks, cracks or deterioration of equipment that could cause a spill. The following inspection procedures shall be instituted at the specified frequency.

6.1 Weekly – Tanks and Secondary Containment Structures

The facility conducts weekly inspections per Champion Technologies' internal policy. These inspections cover all applicable oil product tanks and associated piping connections for evidence of leakage and deterioration. The inspection procedures include:

(1) an inspection of all secondary containment structures for the presence of water or oil;
(2) a visual inspection of tank exteriors for leaking, damage and/or corrosion; and
(3) an inspection of the tank supports/foundations for signs of deterioration.

In addition, the weekly inspections verify that spill control equipment is available at the facility. The weekly SPCC plan inspection checklist is provided in Appendix C. The weekly inspection records will be maintained on site for a minimum of three (3) years.

6.2 Annually – Inspection of Valves, Piping, and Appurtenances

Regular visual inspections of tanks, tank containment areas, valves, piping, and appurtenances will be performed by the Facility on an annual basis (once every 12 months). Records of these inspections must be kept with the Plan for a minimum of three years.

The facility does not contain underground piping carrying oil or liquids subject to the SPCC rules and therefore integrity and leak testing of buried piping is not applicable to this Facility.

6.3 Periodic Tank Integrity Inspection

Polytanks were purchased and installed in 2006. At the time this SPCC Plan was developed, an API standard specifying the frequency for testing polytanks has not been established. The closest industry standard that references polytanks is API 653 which provides a range of testing based upon the tank's service history of five to twenty years. Due to the age of the tanks and the weekly inspections of the tanks, a hydrostatic test will

be performed no more than 10 years after the tank construction. A procedure for hydro-testing is provided in Appendix J.

6.4 Drainage of Uncontaminated Rainwater

Secondary containment structures at the facility are designed to prevent the uncontrolled release of oil into the environment in the event of a container failure, system component failure or human error. Uncontaminated accumulated rainwater may be drained from the containment structures. In order to minimize the risk of discharging pollutants, these structures will be drained according to the following procedures:

- The decision to discharge uncontaminated rainwater from secondary containment areas will be made by a qualified company professional, who will visually inspect the water for sheen, film or other sign that pollutants are present. When the inspection indicates that the accumulated water has not been visually impacted, rainwater will be allowed to be discharged.

- If a sheen or another indicator (olfactory) of contamination is observed during the initial inspection, the rainwater will be collected and properly disposed of.

- All discharges from diked areas and secondary containment structures will be documented using the form given in Appendix F. Copies of these records will be kept for a minimum period of three years.

Any visually evident leaks or discharges from facilities which result in a minor (non-reportable volume) loss of oil will be promptly repaired and corrected. Any incidental accumulations of spilled or contaminated water will be collected and disposed of properly.

If the qualified company professional identifies a sheen, film, or other sign that pollutants are present, the rainwater will not be discharged. The local HSE representative will be contacted within 24 hours of visual inspection when potentially contaminated rainwater is identified. The HSE representative will provide assistance with waste characterization of the rainwater (hazardous or non-hazardous waste) and disposal options. At no time will impacted rainwater be discharged. See Section 6.6 , Waste Disposal for additional information on disposal of recovered materials and other waste products.

6.5 Spill Response

It is to be emphasized that the first priority in any spill response effort must be on personnel safety. The response, reporting and clean-up procedures to be followed following the discovery of an oil spill are given in Appendix F. A critical element of every spill response is to follow a Job Safety Analysis (JSA), developed in consultation with Champion's HSE Department.

No spill above the Reportable Quantity has occurred at the facility since opening in 2011.

6.6 Waste Disposal

The disposal of all recovered material, contaminated soil, used absorbent materials, and other spill materials will be coordinated by qualified Champion personnel (designated as the "Spill Coordinator"). If facility personnel contained the spill, immediate contact with the area supervisor will be made so that proper and timely disposal can occur. After spill response is complete, all spill equipment that cannot be reused and which has been contaminated will be managed for proper disposal.

Clean-up materials will be removed from temporary staging areas within a timely manner following clean-up completion, to be managed with the facility's normal waste disposal activities. The Facility will use a licensed waste transporter and disposal facility for all generated wastes. The Spill Coordinator will ensure that the waste is properly labeled, transported, and disposed of properly. All waste generated during the clean up of any spill will be removed from the facility and disposed of in a timely manner (within 60 days of generation). All waste will be disposed off-site at a facility approved by the appropriate federal or state agency to accept the waste.

7.0 Training and Recordkeeping

7.1 Personnel Training

Champion Technologies' SPCC Training will consist of a classroom presentation and "on the job" training will be used to train all Champion Technologies facility representatives (upon initial hire) who handle oil products at the facility. This training will cover the following topics as required under 40 CFR 112.7(f):

- Overview of general facility operations
- Safe procedures for handling oil products
- Operation and maintenance of equipment used to prevent oil discharges
- Procedures and requirements for reporting an oil discharge
- Overview of applicable pollution control laws, rules, and regulations
- Review of the content of the SPCC Plan for the facility

In addition, Champion Technologies representatives who handle oil products at the facility will receive oil discharge prevention briefings annually (or more frequently if a spill or discharge occurs) that describe any oil discharges, and any equipment failures or malfunctions that led or could have led to an oil spill or discharge. These oil discharge prevention briefings will also include an overview of any recent prevention or control measures that have been implemented.

7.2 Recordkeeping

Records described in the SPCC will be retained on-site and available for review by New Mexico Environment Department and/or EPA for three years beyond the date of the record or sample, measurement, report, application, or certification.

8.0 Management Approval

This Spill Prevention, Control and Countermeasure (SPCC) Plan has the full approval of management with the authority to commit the necessary resources. The programs and procedures outlined in this Plan will be implemented and periodically reviewed and updated in accordance with 40 CFR Part 112, as amended, and with applicable state and local requirements. The management approval also designates the person who is accountable for overall discharge prevention at the facility.

_____

Name of Management Representative:

_____

Title:

_____

Signature:

_____

Date:

9.0 SPCC Plan Review and Amendment

A complete review and evaluation of the SPCC Plan will be conducted at least every five (5) years in accordance with 40 CFR 112.5.

If the review indicates changes are necessary, then the plan will be amended as appropriately. The management signatory, above, agrees not to implement any technical amendments to this Plan without the review and certification of a professional engineer, as may be noted in a technical amendment to the Plan. Technical amendments may include, but are not limited to the following:

- commissioning of containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures; or
- changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Any amendments to the SPCC Plan will be implemented as soon as possible, but no later than six (6) months after preparation of the - amendment.

Scheduled five-year reviews and Plan amendments are recorded in the table below. This table will be completed even if no amendment is made to the Plan. Unless a technical or administrative change prompts an earlier review, the next scheduled review of this Plan will occur by April 18, 2016.

Date	Authorized Individual/Title	Review Type	PE Certification Required?	Summary of Changes

10.0 PE Certification

In accordance with 40 CFR 112.3(d), I hereby certify that:

I am familiar with the provisions of 40 CFR Part 112 – Oil Pollution Prevention; I, or my agent (Champion Technologies personnel), have visited and examined the facility described herein;

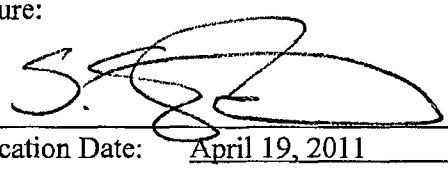
This SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of 40 CFR Part 112;

Procedures for required inspections and testing have been established; and

This SPCC Plan is adequate for the facility:

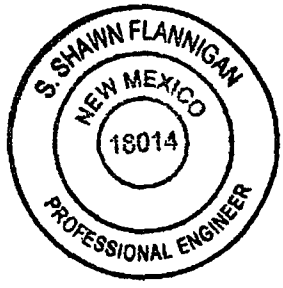
Champion Technologies at 4001South Highway 18, Hobbs, New Mexico, 88240

Name/Title: S. Shawn Flannigan, P.E. / Principal
Company: Alliant Environmental, LLC.
Alliant Environmental, LLC is a registered engineering firm (Registration Number 9845) with the New Mexico Board of Professional Engineers.
Signature:



Certification Date: April 19, 2011

PE Registration Number: 18014
PE Registration State: New Mexico
PE Engineering Seal:



Appendix A: Certification of the Applicability of the Substantial Harm Criteria

Facility Name: **Champion Technologies**

Facility Address: 4001South Highway 18, Hobbs, New Mexico, 88240

1) Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallon?

No

2) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and does the facility lack secondary containment that is sufficiently large enough to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

No

3) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

No

4) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

No

5) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

No

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information I believe that the submitted information is true, accurate, and complete.

Signature:_____ Title: _____

Name: _____ Date: _____

Appendix B: Transfer and Product Handling Procedures

Champion Technologies *Committed to Improvement*	Tier 2 – ABU Procedure
TITLE: LOADING / UNLOADING TANKER TRUCKS	
Please see the Sharepoint site for most recent version.	

1.0 PURPOSE

1.1 To provide a standard procedure for filling fixed bulk storage tanks from tanker trucks.

1.2 To provide the PPE required when filling fixed bulk tanks from tanker trucks.

1.3 To provide the job hazards and the recommended actions to eliminate or minimize the hazards when filling fixed bulk storage tanks.

2.0 SCOPE

2.1 Product loading and unloading of tanker trucks at a Champion Technologies facility.

3.0 RESPONSIBILITY

Location managers are responsible for procedure implementation.

All location managers are responsible for ensuring that their employees follow this procedure as applicable.

4.0 PROCEDURE

4.1 Tanker truck arrives with chemical.

4.2 Facility employee reviews and receives the driver's bill of lading. Verify product storage availability to ensure an overfilling condition does not exist.

4.3 Review MSDS of each chemical before the filling process commences.

4.4 Visually check the tank's visual tank gauge to ensure that the tank has the capability to receive the volume from the tanker truck. Do not continue unless there is sufficient capacity. If sufficient capacity is not available, contents may be loaded into a tote tank.

4.5 Ground tanker before transfer commences. Follow the Champion Bonding and Grounding Procedure.

4.6 Ensure all hoses and pumps are in good working condition. Hook up hose from the truck to the pump and then from pump to the appropriate bulk storage header valve. Ensure the tanker vent valve is open.

4.7 Open the header and bulk tank valve.

4.8 Open the tanker truck valve and turn on the pump. Look for any leaks on connections or hoses. Stay within arm's length of the pump and shut down if leaks exist.

4.9 Monitor volume availability of the storage tank while pumping to ensure overfilling does not occur.

4.10 Upon completion, close tanker truck valve and break the hose connection at the tanker.

4.11 Allow pump to run to remove residual product from the hoses.

4.12 Turn the pump off. Close header valve. Close bulk storage tank valve. Break down, cap and secure hoses.

4.13 Ensure the tanker vent valve is shut.

4.14 Release the truck.

5.0 SAFETY

PERSONAL PROTECTIVE EQUIPMENT

PPE	When Required
Safety Glasses	To be used when impact from flying objects or debris is expected.
Chemical Goggles	Chemical goggles are required to be worn when chemical splashes may be anticipated.
Hard Hat	Should meet Class E (formerly Class B) requirements, which meet impact and low voltage requirements. To be worn in the warehouse, yard, on the forklift, and customer locations.
Gloves	o Non-slip chemical resistant o Chemically resistant (Includes nitrile, butyl, or other gloves compatible with the chemicals used.)
Hard-toed Shoes	o Steel-toed or o Safety Cap

TITLE: LOADING / UNLOADING TANKER TRUCKS

6.0 HAZARDS

JOB HAZARD/A.O.C.	ELIMNINATING/MINIMIZING THE HAZARD
Chemical Vapors/Splashes	o Work upwind and keep head away. o Wear respirator when required. o Keep bungs closed when possible. o Wear chemical goggles and chemical resistant gloves.
Hose Rupture or Disconnect	o Inspect hoses before use. o Ensure hose connections are secure before pumping. o Wear proper PPE.
Tank Overfilling	o Ensure product space availability before pumping. o Monitor volume continuously while filling.
Broken Glass	o Wear chemical goggles and chemical resistant gloves.

Champion Technologies

Committed to Improvement

Tier 2 – ABU Procedure

TITLE: DRUM AND TOTE TANK FILLING OPS

Please see the Sharepoint site for most recent version.

1.0 PURPOSE

The purpose of this procedure is to provide written instructions to properly and safely operate equipment when packaging materials and to prevent pollution to the environment.

2.0 SCOPE

The scope of this procedure is limited to the following Champion Technologies on-site operations:

- Product drum, tote tank and pail filling

3.0 RESPONSIBILITY

3.1 Location managers are responsible for procedure implementation.

3.2 All location managers are responsible for ensuring that their employees follow this procedure as applicable.

4.0 REQUIRED EQUIPMENT

- Empty tote tanks, drums, or pails
- Pump
- Hose
- Grounding wire
- Filling gauge

Champion Technologies

Committed to Improvement

Tier 2 – ABU Procedure

TITLE: **DRUM AND TOTE TANK FILLING OPS**

5.0 SAFETY

PERSONAL PROTECTIVE EQUIPMENT

PPE	COMMENTS
Safety Glasses	Used as a minimum for eye protection.
Chemical Goggles	Chemical goggles are required to be worn when chemical splashes may be anticipated.
Hard Hat	Should meet Class E (formerly Class B) requirements, which meet impact and low voltage requirements. To be worn in the warehouse, yard, on the forklift, and customer locations.
Gloves	o Non-slip chemical resistant o Chemically resistant (Includes nitrile, butyl, or other gloves compatible with the chemicals used.)
Hard-toed Shoes	o Steel-toed or o Safety Cap
Respiratory Protection	Wear air purifying respirator with acid gas, organic vapor, or other appropriate cartridges when PEL is exceeded, contaminants are below IDLH levels, and breathing air is between 19.5% and 23.5%.

6.0 HAZARDS

JOB HAZARD	*ELIMINATING / MINIMIZING THE HAZARD*
Chemical Vapors	o Work upwind and keep head away. o Wear respirator when required. o Keep bungs closed when possible.
Hose Rupture or Disconnect	Inspect hoses before use. Ensure hose connections are secure before pumping. Wear proper PPE.

Champion Technologies

Tier 2 – ABU Procedure

Committed to Improvement

TITLE: DRUM AND TOTE TANK FILLING OPS

7.0 PROCEDURE

7.1 A work order is generated.

7.2 Select an empty pail, drum or tote tank that meets all D.O.T. requirements.

7.3 Perform a visual inspection of each pail, drum or tote tank. Inspect externally for cracks, warping, corrosion, dents, leaks, other structural damage, and chemical residue around all threaded connections. NOTE: Tote tanks that do not pass the visual inspection are to be placed out of service, triple rinsed, fixed if required, and retested using the Champion Portable Tank Testing Procedure.

7.4 Review MSDS of each chemical before the filling process commences.

7.5 Remove all old labels and replace with new labels corresponding to the material in the work order.

7.6 Set up pump and hoses and ensure they are in good working condition.

7.7 DEEPWATER ONLY: All Deep Water (DW) products must be filtered while filling.

7.8 Connect hose to the manifold and to the pump and ensure camlock security pin is inserted to prevent connection failure.

7.9 Connect hose to the drum filling stinger and ensure the stinger reaches the bottom.

7.10 Open the valve at the manifold system.

7.11 Ensure no residual pressure is in the lines by slowing turning the stinger valve ¼ open.

7.12 Turn the pump on and slowly open the stinger valve to the full open position.

7.13 Monitor the filling gauge to ensure no overflow of the drum or tote tank.

7.14 When the drum or tote tank is full, turn the stringer valve to the closed position.

7.15 The stinger is removed slowly from the drum to allow for drainage of excess chemical.

7.16 The stinger is placed into the next drum or tote tank and the valve is slowly turned to the fully open position and the filling process is repeated.

7.17 After all tanks / drums are filled, close the manifold valve to allow displacement of the pumps and hoses.

7.18 The pump is switched into the "OFF" position

7.19 The discharge hose is disconnected from the discharge outlet of the pump, and held high enough to ensure chemical is not spilled.

7.20 Disconnect the hose at the manifold and ensure the ends of the hose are locked together to prevent any spills from occurring.

7.21 Disconnect the hose from the discharge of the pump to the stinger and ensure the ends are held up to prevent chemical spill.

7.22 Pull the stinger out and allow excess to drain into the drum or tote tank.

7.23 The stinger is swiped clean and stored properly.

7.24 Ensure all hoses are properly stored to prevent chemical pollution.

7.25 Seal the drum or tote tank and ensure the proper label is on the container.

7.26 Place in inventory or stage from delivery.

Appendix C: Weekly Inspection Checklist

This appendix includes an example of the weekly inspection checklist. This inspection record will be completed weekly. During the inspection if any item receives "no" as an answer, it will be described and addressed immediately.

Periodically the weekly inspection checklist is updated. The updated checklist is available on the QHSE Sharepoint Site under forms.

CHAMPION TECHNOLOGIES
REGULATORY/COMPLIANCE WEEKLY INSPECTION REPORT

FACILITY: HOBBS, TX **DATE:**_____

WAREHOUSE AREA	YES	NO	N/A
1. CLEAN AND ORDERLY			
2. DRUMS NEATLY STACKED/STORED			
3. FREE FROM LEAKS AND SPILLS			
4. NO SMOKING SIGNS POSTED			
5. FIRE EXTINGUISHERS MOUNTED AND CHARGED			
6. FIRST AID KIT			
7. ABSORBENT MATERIAL TO CONTAIN LEAKS OR SPILLS			
8. ALL CONTAINERS PROPERLY LABELED AND CLOSED			
9. ALL PORTABLE AND FIXED LADDERS STRUCTURALLY SOUND			
REMARKS:			
PRODUCT TRANSFER AREA	YES	NO	N/A
1. LINES AND VALVES FREE FROM LEAKS			
2. ELECTRICAL EQUIPMENT CHECKED FOR HAZARDS			
3. WIRING IN GOOD CONDITION			
4. FLOOR/WORK AREA CLEAN			
5. NO SMOKING SIGNS POSTED			
6. FIRE EXTINGUISHER MOUNTED AND CHARGED			
7. ALL CONTAINERS PROPERLY LABELED AND CLOSED			
8. SHOP RAGS STORED IN SELF-CLOSING METAL STORAGE CONTAINER			
REMARKS:			
FUEL TANK AREA	YES	NO	N/A
1. FREE FROM SPILLS OR LEAKS			
2. TANK PROPERLY GROUNDED			
3. AREA CLEAN			
REMARKS:			
BULK STORAGE TANKS (ABOVEGROUND STORAGE TANKS)	YES	NO	N/A
1. TANK SURFACES SHOW NO SIGN OF LEAKAGE (IE. STAINS, RUST, ETC.)			
2. CONNECTIONS, PIPINGS, AND VALVES FREE FROM LEAKS (NO SIGNS OF STAINS ON CONCRETE BENEATH CONNECTIONS, PIPING, AND VALVES)			
3. BOLTS, RIVETS, AND SEAMS ARE IN GOOD CONDITION			
4. MANIFOLDS FREE FROM LEAKS			
5. SUMP(S) ADEQUATELY PUMPED DOWN			
6. TANK HATCHES CLOSED AND SECURE			
7. TANKS PROPERLY GROUNDED			
8. TANKS PROPERLY LABELED			
9. EYEWASH/SAFETY SHOWER ACCESSIBLE, TESTED & WORKING PROPERLY			
10. TANK LEVEL GAUGES/SITE GLASS OR ALARMS ARE OPERATIVE			
11. VENTS ON TANKS ARE CLEAR			
12. NO WATER/PRODUCT IN INTERSTICE OF DOUBLE-WALLED TANK			
13. HOUSEKEEPING MAINTAINED IN AREA			
REMARKS:			

SECONDARY CONTAINMENT – ABOVEGROUND STORAGE TANKS	YES	NO	N/A
1. NO STORMWATER, PRODUCT, OR OTHER LIQUID STANDING WITHIN SECONDARY CONTAINMENT			
2. DIKE CONTAINMENT AREA FREE FROM DRUMS, CONTAINERS, OR OTHER MATERIALS			
3. DIKE DRAINAGE VALVE IS CLOSED AND LOCKED			
4. NO NEW STAINS OR CRACKS (WIDTH GREATER THAN VERTICAL DIME) VISIBLE ON SECONDARY CONTAINMENT WALLS AND FLOORS			
SECONDARY CONTAINMENT – DRUM AND TOTE STORAGE AREA	YES	NO	N/A
1. NO STORMWATER, PRODUCT, OR OTHER LIQUID STANDING WITHIN SECONDARY CONTAINMENT			
2. DIKE CONTAINMENT AREA FREE FROM DRUMS, CONTAINERS, OR OTHER MATERIALS			
3. DIKE DRAINAGE VALVE IS CLOSED AND LOCKED			
4. SECONDARY CONTAINMENT WALLS AND FLOORS ARE IN GOOD CONDITION – NO NEW STAINS OR CRACKS (WIDTH GREATER THAN VERTICAL DIME) IN WALL OR FLOOR VISISBLE.			
REMARKS:			
LOADING/UNLOADING AREA – MANIFOLD SYSTEM	YES	NO	N/A
1. LOADING/UNLOADING MANIFOLD IS IN GOOD CONDITION (NO VISIBLE DAMAGE OR DETERIORATION)			
2. ALL CONNECTIONS ARE CAPPED OR BLANK-FLANGED			
3. NO STANDING PRODUCT/LIQUID IN SPILL TROUGH			
REMARKS:			
YARD AREA	YES	NO	N/A
1. FENCE AND GATE SECURE			
2. FREE FROM SPILLS OR LEAKS			
3. DRUM STORAGE AREA ORDERLY			
4. DRUM STORAGE AREA FREE FROM LEAKS			
5. DRUMS AND CONTAINERS PROPERLY LABELED AND CLOSED			
REMARKS:			
EMPTY DRUM STORAGE AREA	YES	NO	N/A
1. FREE FROM SPILLS OR LEAKS			
2. STACKED IN ORDERLY MANNER			
3. BUNGS INSTALLED ON ALL DRUMS			
4. BUNGS ARE SEALED			
REMARKS:			

WASTE ACCUMULATION AREA & SATELLITE ACCUMULATON AREA	YES	NO	N/A
1. HAZARDOUS AND NONHAZARDOUS WASTE CONTAINERS IN GOOD CONDITION AND ARE CLOSED/SEALED			
2. HAZARDOUS WASTE CONTAINERS LABELED WITH THE ACCUMULATION START DATE (WASTE AREA), HAZARDOUS PROPERTIES (IE. FLAMMABLE, CORROSIVE, ETC.), CONTENTS, AND PHYSICAL PROPERTY			
3. HAZARDOUS WASTE IN CONTAINMENT			
4. NON-HAZARDOUS WASTE (LIQUID ONLY) IN CONTAINMENT			
5. NO SPILLS OR OTHER LEAKS FROM WASTE CONTAINERS VISIBLE			
6. NO STORM WATER OR OTHER LIQUID STANDING WITHIN SECONDARY CONTAINMENT			
7. SHOW NUMBER OF HAZARDOUS WASTE CONTAINERS (ENTER NUMBER OF DRUMS/CONTAINERS IN YES COLUMN)			
8. SHOW NUMBER OF NON- HAZARDOUS WASTE CONTAINERS (ENTER NUMBER OF DRUMS/CONTAINERS IN YES COLUMN)			
REMARKS:			
SECURITY AND EMERGENCY RESPONSE	YES	NO	N/A
1. ALL PROPERTY & EQUI PMENT KEPT IN WAREHOUSE/FENCED LOCATIONS			
2. WAREHOUSES/FENCES EQUIPPED WITH A LOCKING DOOR OR GATE			
3. VEHICLES LOCKED DURING STORAGE			
4. KEYS TO VEHICLES PLACED IN A CONTROLLED ACCESS LOCATION			
5. FENCE/ WAREHOUSE ADEQUATE TO MINIMIZE UNAUTHORIZED ACCESS			
6. FACILITY GATES AND DOORS CLOSED AND LOCKED WHEN NO PERSONNEL ARE AT THE FACILITY			
7. EMERGENCY CONTACT LIST POSTED			
8. EMERGENCY/AUBIBLE ALARM TESTED (AT LEAST MONTHLY)			
9. WIND DIRECTION INDICATORS AVAILABLE AND IN GOOD CONDITION			
10. SPILL KITS AND SUPPL IES AVAILABLE			
REMARKS/ACTION ITEMS:			

INSPECTED BY:_____ SIC CODE: 5169

NUMBER OF PERSONNEL AT FACILITY:_____ MANAGER'S INITIALS:_____

Appendix D: Annual Inspection Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. **Any item that receives "yes" as an answer must be described and addressed immediately. Actions taken and date performed must be attached to this Checklist. Periodically this checklist is updated. The updated form is available on QHSE Sharepoint under forms.**

TANK AREA –
(Copy form as necessary to complete for each tank containment area)

	Y	N	NA	Comments
Concrete floor and dike				
Secondary containment is stained				
Dike drainage valve is open or is not locked				
Dike walls or floors are cracked or are separating				
Dike does not retain water following large rainfall				
Piping – aboveground				
Valve seals or gaskets are leaking				
Pipelines or supports are damaged/deteriorated				
Joints, valves & other appurtenances are leaking				
Buried piping is exposed				
Out-of-service pipes are not capped				

Sketch Tank Area: identify any yes responses:

Tanks
For each tank within containment, complete the following (attach copies of sheet if more than 6 tanks in containment)

	Tank #	Y	N	NA	**Tank #**	Y	N	NA	**Tank #**	Y	N	NA
	Tank surfaces show signs of leakage				*Tank surfaces show signs of leakage*				*Tank surfaces show signs of leakage*			
	Tank is damaged, rusted or deteriorated				*Tank is damaged, rusted or deteriorated*				*Tank is damaged, rusted or deteriorated*			
	Bolts, rivets, or seams are damaged				*Bolts, rivets, or seams are damaged*				*Bolts, rivets, or seams are damaged*			
	Tank supports are deteriorated or buckled				*Tank supports are deteriorated or buckled*				*Tank supports are deteriorated or buckled*			
	Tank foundations have eroded or settled				*Tank foundations have eroded or settled*				*Tank foundations have eroded or settled*			
	Overflow gauges or alarms are inoperative				*Overflow gauges or alarms are inoperative*				*Overflow gauges or alarms are inoperative*			
	Vents are obstructed				*Vents are obstructed*				*Vents are obstructed*			
	Comments:				Comments:				Comments:			
	Tank #	Y	N	NA	**Tank #**	Y	N	NA	**Tank #**	Y	N	NA
	Tank surfaces show signs of leakage				*Tank surfaces show signs of leakage*				*Tank surfaces show signs of leakage*			
	Tank is damaged, rusted or deteriorated				*Tank is damaged, rusted or deteriorated*				*Tank is damaged, rusted or deteriorated*			
	Bolts, rivets, or seams are damaged				*Bolts, rivets, or seams are damaged*				*Bolts, rivets, or seams are damaged*			
	Tank supports are deteriorated or buckled				*Tank supports are deteriorated or buckled*				*Tank supports are deteriorated or buckled*			
	Tank foundations have eroded or settled				*Tank foundations have eroded or settled*				*Tank foundations have eroded or settled*			
	Overflow gauges or alarms are inoperative				*Overflow gauges or alarms are inoperative*				*Overflow gauges or alarms are inoperative*			
	Vents are obstructed				*Vents are obstructed*				*Vents are obstructed*			
	Comments:				Comments:				Comments:			

LOADING/UNLOADING AREAS					
	Y	N	NA	Comments	Sketch Loading/Unloading Area: identify any yes responses:
Manifold					
Manifold is damaged or deteriorated					
Connections are not capped or blank-flanged					
Loading area drainage valve is open					
Catch buckets not kept closed or have residue on outside of bucket					
Containment (speed bumps/berms, floors, curbing, etc.)					
Dike walls or floors are cracked or are separating					
Curbed/contained area does not retain water following large rainfall					
Floor is stained					
SECURITY					
Fencing, gates, or lighting is non-functional					
Pumps and valves not in use are not locked					
RESPONSE EQUIPMENT					
Response equipment inventory is incomplete					

Signature: _____ **Date:** _____ **Manager's Signature:** _____ **Date:** _____

The following items were identified during annual inspection. Describe action taken to remedy the identified item and the date performed.

Identified Issue:	Action Taken to Remedy	Signature	Date Performed

Appendix E: Annual SPCC Refresher Training

Date of Training: _____

Training Instructor: _____

Covered Topics:

1.
2.
3.
4.
5.

Name (printed)	Name (signature)

Appendix F: Spill Response and Spill Notification/Reporting Procedure

Minor/Incidental Spills (<=55 gallons)

NOTE: Contact QHSE Representative if spill leaves secondary containment structures.

- Prevent the source of the spill from continuing to discharge oil if possible (e.g., place the container upright, stop the pump).
- Apply the absorbent material in a sufficient amount to absorb the oil. If the spill occurs in an area where the floor/ground is sloped, then place temporary drain covers over the floor drains and catch basins in the area, if applicable. Apply the absorbent in front of the leading edge of the spill; covering the entire spill area. If appropriate for the spill scenario, prevent the oil from reaching the storm water catch basin by applying additional absorbent around (not in) the catch basin.
- Place the oil/absorbent residue in a plastic bag within a plastic bag (i.e., double bagged). Use a broom and dustpan to thoroughly clean the area where the spill occurred.
- Properly dispose of the oil/absorbent residue consistent with federal, state and/or local requirements.
- The Facility Manager will inspect the location of the spill to ensure the clean up was performed correctly and that no recoverable residue remains.

Large Spills (> 55 gallons)

- Prevent the source of the spill from continuing to discharge oil, if possible (e.g., place the container upright, stop the pump, turn off a valve, etc.).
- Dike far ahead of the liquid spill pathway using on-site boom, absorbents, or soil. The purpose is to contain the liquid or limit the area to which it travels –not to begin clean-up.
- If spill is beyond capability of Champion to properly handle, contact Garner Environmental at 1-800-424-1716. **Approximate response time is 2 hours from contact.**
- You will need to provide the following information:
    - Directions to facility
    - Type and amount of released material
    - Health and safety information from MSDS (PPE requirement)
- Contact the Regional QHSE representative to report the spill.
    - Regional QHSE representative will assist with calculating RQ for spilled material using a combination of the Material Safety Data Sheet (MSDS), 40 Code of Federal Regulations (CFR) §302.4 Designation of Hazardous Substances, and the Mixture Rule.
    - Regional QHSE Representative will assist with contacting agencies as described below.

Spill Equipment

Hobbs will maintain at least one spill kit onsite to clean up and dispose of releases. At a minimum the spill kit will include

- 25 pounds "kitty litter" or loose absorbent
- One boxes 2 ft x 3 ft absorbent pads
- One box nitrile gloves
- Large plastic bags
- Broom
- Spark-free shovel
- Dustpan

Health and Safety Consideration

In the event of an incidental (minor) spill, the distribution center representative will contact the Facility Manager and Champion's HSE department regarding the spill. Prior to initiating a cleanup, a Job Safety Analysis (JSA) is to be developed which takes into account the nature of the spilled fluids, making reference to the respective MSDS sheet(s). The JSA may provide guidance which is in addition to, or supersedes, the general response procedures summarized above.

Spill Notification/Reporting Procedure

Regulations for liquid releases from tanks, totes, drums, and hoses depend in part as to whether the release occurred within secondary containment (concrete wall and floor) or if the release discharged to land or water. There are two triggers for reporting to the TCEQ or the EPA: (1) the released amount is above the Reportable Quantity or (2) if an oil release, the release creates a sheen on water.

When released to the environment, the majority of raw materials and Champion Technologies products are regulated by the Comprehensive Emergency Response Compensation Liability Act (CERCLA). CERCLA is also referred to as Superfund. A list of hazardous materials and its reportable quantity (RQ) in pounds is provided in the CERCLA regulation, 40 CFR 302.4. The RQ for Champion Technologies' product varies depending on its hazardous constituents, percentage of the hazardous constituent found in the product, and the toxicity of the hazardous constituent. **Contact your QHSE Representative to calculate the RQ.**

Release Location	**Regulatory Trigger**
Within Secondary Containment (concrete wall/floor) – no impact to soil or water	If the release is contained entirely within secondary containment (concrete wall and floor) with no potential for impact to soil or water, the release **must be pumped out within 24 hours as either:** • **Product** – pump into a container (ie. tank or drum) if the released material remains a viable product (containment is clean and no storm water) or • **Waste** – if the secondary containment contains storm water or is not clean, the released product no longer meets the specifications of the Material Safety Data Sheet (MSDS) and is considered a waste. The waste must be pumped out to the wastewater treatment area (see Waste Management Plan for characterization and procedure).
Surface	For oils or oil soluble products (see MSDS for solubility), the EPA has

Release Location	Regulatory Trigger
Water	determined that the Reportable Quantity (RQ) is exceeded when one of the following occurs: • Film or "sheen" (discoloration) on the surface of the water Note: Generally, it does not take a large amount (less than 1 gallon) to form a film or sheen on a water's surface. The "rainbow" effect commonly seen in parking lots is the best example of this. • Violates applicable water quality standards, or • Sludge or emulsion is deposited beneath the surface of the water. For water-soluble products the regulation is based upon changes to the surface water that may result in a danger to human health or the environment. **As a BMP, any release/spill to surface water MUST be reported at a minimum to the applicable state agency.**
Land	**For releases or spills to land, reporting is based upon the RQ Calculation. Contact your QHSE Representative to calculate the RQ and/or check the MSDS**

Discharge Discovery and Reporting [112.7(a)(3)]

Several individuals and organizations must be contacted in the event of an oil discharge. The EPA and the New Mexico Environment Department require notification in a timely manner depending on the material and quantity released to the environment. The timeline starts when someone at the facility becomes aware of a release that exceeded the RQ. However, **all spill, discharges and releases regardless of whether they are reportable to an Agency MUST be documented using Champion Spill/Discharge Form (Sharepoint) and be entered into the Accident/Incident Tracking System.**

The Facility Manager is responsible for ensuring that all required discharge notifications have been made. All discharges should be reported to the QHSE Regional Representative.

Verbal Notification Requirements (Local, State, and Federal (40 CFR Part 110)

- **Local** - Any unauthorized discharge into air, land, or water must be reported immediately to the State, Police, and the Local Emergency Planning Committee (LEPC) as soon as the discharge is detected.

- **State** – New Mexico Department of Environment requires notification if:
  Any amount of any material in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or may unreasonably interfere with the public welfare or the use of property. This includes chemical, biohazardous, petroleum-product, and sewage spills and incidents. In addition to recent spills, the discovery of evidence of previous unauthorized discharges, such as contaminated soil or ground water, also must be reported.

Verbal notification must be provided as soon as possible after learning of a discharge, but in no event more than twenty-four (24) hours thereafter. Contact the NMED's hotline at 505-827-9329.

- **Federal** - For any discharge that reaches navigable waters, or threatens to reach navigable waters, immediate notification must be made to the National Response Center (NRC) Hotline and EPA.

When making a verbal report, be prepared to answer the following questions:

  - Reporter's name and phone number
  - Name and mailing address of facility
  - County where incident occurred
  - Incident date
  - Time and location
  - Extent of injuries (if applicable)
  - Name and quantity of hazardous materials involved
  - Type of incident (ie. release from tank, tanker truck overturned, etc.)
  - Nature of hazardous materials involved – it's recommend to have the MSDS available to refer to
  - Media affected
  - Description of how the release occurred

- **Federal** - A written notification must be made to the EPA for any single discharge of oil to navigable waters or adjoining shoreline waterway of more than 1,000 gallons or for two discharges of 42 gallons of oil to a waterway in any 12-month period.

Appendix G: Emergency and Agency Contact Numbers

For emergencies, call 911.

Champion Technologies Contact and Phone Numbers

Name	Title	Office Number	Mobile Number
Mike Athey	Regional Manager	(432) 683-4217	(432) 664-4587
Larry Hodnett	District Manager	(575) 393-7726	(575) 631-3639
Bob Parham	Regional Operations Manager	(432) 563-0008	(432) 557-7198
Jayson Ussery	Operations Supervisor	(575) 393-7726	(575) 631-4903
James Hamilton	Regional QHSSE Manager	(432) 683-4217	(432) 425-9021
Kris Mabry	District QHSSE Rep	(432) 563-0008	(432) 661-2209

New Mexico

Hospital – Lea Regional Medical Center 5419 Lovington Highway	575-492-5000
Fire Department (HazMat)	911
Police Department	911
LEPC Lea County 100 North main Lovington, NM 88260 Contact: Lorenzo Velazquez	575-393-2870 575-396-6328 (fax)
National Response Center	(800) 424-8802
Chemtrec	(800) 424-9300
New Mexico Environmental Department	575-827-9329 (emergency) 866-428-6535 (voice mail – non emergency – expect return call – if no returned call contact NMED) For non-emergencies, and to reach an on-duty NMED staff member during normal business hours, call 575-476-6000.
If any quantity of spilled materials reaches or is likely to reach navigable waters, contact EPA to report and to ask for guidance - USEPA Region VI	(214) 665-6489

Spill Response Contractor - Garner Environmental 1-800-424-1716

Appendix H: Record of Drainage of Non-Contaminated Water from Secondary Containment

Note: periodically this form is updated and is included for reference purpose only. The most recent copy of the form is available on SharePoint.

Dike Drainage Discharge Form

Fill out a separate form for each sample collected and prior to water release. This is performed to ensure no water is released that has the potential to cause harm to persons, property, and the environment.

Fill out or Circle Each That Apply		
Person Collecting/Examining Sample:		
Discharge Location:		
Date and Time Collected and Examined:		
Rainfall Amount:		
Parameter	Parameter Description	Parameter Characteristics
Color	Is the water colored? **Yes No**	Describe If Necessary:
Clarity	Is the water clear or transparent? Can you see through it? **Yes No**	Which of the following best describes the water clarity? **Clear Milky Opaque**
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? **Yes No**	Which of the following best describes the water sheen? **Oily Silver Iridescent**
Odor	Does the sample have an odor? **Yes No**	Describe If Necessary:
Floating Solids	Is there something floating on the surface of the sample? **Yes No**	Describe If Necessary:
Suspended Solids	Is anything suspended in the sample? **Yes No**	Describe If Necessary:
Settled Solids	Is there something settled at the bottom of the sample? **Yes No**	Describe If Necessary:
Foam	Is there foam or material forming on top of the water? **Yes No**	Describe If Necessary:
Detail any concerns or if any corrective actions were taken:		
Collector's Signature and Date:		

Appendix I: Regulatory Cross-Reference Table

SPCC Rule	Description of Section	Plan Section
112.7	Management Approval	Section 8
112.5	SPCC Plan Review and Amendment	Section 9
112.3(d)	Engineer Certification	Section 10
112.7	General Requirements	Section 1
112.7(a)(1) and (a)(2)	Conformance with Applicable Requirements; Deviations from Plan Requirements – Equivalent Environmental Protection	N/A
112.7(a)(3)	Facility Description and Site Layout	Section 4 and Figures
112.7(a)(3)(i)	Type of Oil and Storage Capacity	Section 4
112.7(a)(3)(ii)	Discharge Prevention Measures	Section 4 & 5
112.7(a)(3)(iii)	Discharge Drainage Controls as Secondary Containment	Section 6
112.7(a)(3)(iv)	Countermeasures for Discharge Discovery, Response, and Cleanup	Section 6.5
112.7(a)(3)(v)	Methods of Disposal of Recovered Materials	Section 6.6
112.7(a)(3)(vi)	Contact List and Phone Numbers	Appendix G
112.7(a)(4)	Discharge Reporting Information	Appendix G
112.7(a)(5)	Organization of Response Procedures	Appendix F
112.7(b)	Potential Spill Prediction Information	Section 5
112.7(c)	Containment and Diversion Structures or Equipment	Section 5
112.7 (d)	Oil Spill Contingency Plan	N/A
112.7(e)	Inspections, Integrity Testing and Recordkeeping Practices	Section 6 and 7
112.7(f)	Personnel Training, and Discharge Prevention Procedures	Section 7.1
112.7(g)	Security	Section 5.4

SPCC Rule	Description of Section	Plan Section
112.7(h)	Facility Tank Car and Truck Loading/Unloading	Section 5.2 and Appendix B
112.7(i)	Field-constructed Aboveground Container Repair	NA
112.7(j)	Applicable State Rules and Regulations	Appendix F
112.8(a)	General Requirements	Section 6
112.8(b)(1)	Drainage from Diked Storage Areas	Section 6 and Appendix H
112.8(b)(2)	Valves to Control Drainage in Diked Storage Areas	Section 5
112.8(b)(3)	Drainage from Undiked Areas	Section 5, 6, and Appendix C/D
112.8(b)(4)	Discharge from Ditches	NA
112.8(b)(5)	Drainage from Treatment Systems	NA
112.8(c)(1)	Bulk Storage Container Material of Construction	Section 5
112.8(c)(2)	Bulk Storage Container Secondary Containment	Section 5
112.8(c)(3)	Bulk Storage Container Area Drainage	Section 5 and 6, App. H
112.8(c)(4)	Completely Buried Metallic Tank Cathodic Protection	NA
112.8(c)(5)	Partially Buried Metallic Tank Cathodic Protection	NA
112.8(c)(6)	Integrity Test Aboveground Containers	Section 6.3
112.8(c)(7)	Leak Control of Heating Coils	NA
112.8(c) (8)	Discharge Prevention Devices	Section 6
112.8(c)(9)	Inspection of Effluent Treatment Systems	NA
112.8(c)(10)	Visible Discharges/Accumulation of Oil	Section 6 and Appendix H
112.8(c)(11)	Mobile or Portable Storage Containers	Section 5
112.8 (d) (1)	Transfer System Buried Piping	NA
112.8(d)(2)	Transfer System Terminal Connection	NA
112.8(d)(3)	Transfer System Pipe Supports	NA

SPCC Rule	Description of Section	Plan Section
112.8(d)(4)	Transfer System Inspection of Aboveground Piping	Section 6 and Appendix D and E
112.8(d)(5)	Transfer System Security	Section 6 and Appendix D and E
112.12(a)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – General Requirements	NA
112.12(b)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Facility Drainage	NA
112.12(c)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Bulk Storage Containers	NA
112.12 (d)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Facility Transfer Operations, Pumping, and Facility	NA
112.20	Facility Response Plans – General Requirements	NA
112.20(e)	Facility Response Plans – Certification of the Applicability of the Substantial Harm Criteria	Appendix A

Appendix J: Hydro Testing Procedure

Per 40 CFR § 112.8(c)(6) and 112.12(c)(6) each aboveground container must undergo a test for structural integrity on a regular schedule and whenever material repairs are performed. Integrity testing must combine regular visual inspections (weekly facility inspection) with another non-destructive shell testing method. Records of inspections and tests must be retained for three years.

The hydrostatic head test (hydro) demonstrates the ability of the tank and its fittings to perform under hydrostatic pressure. The following test procedure only applies to tanks that are at atmospheric pressure. This procedure is developed using the guidelines and specifications from the American Society for Testing and Materials (ASTM) D 1998-97 Standard Specification for Polyethylene Upright Storage Tanks, American Petroleum Institute (API) Standard 650 Welded Steel Tanks for Oil Storage, and API Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction.

A copy of the Hydrostatic Test procedure for ABU locations is provided on Sharepoint. This section only includes the (checklist and form. **Please see the Sharepoint site for most recent version of the hydrostatic test.**

THIS PROCEDURE TESTS THE STRUCTURAL INTEGRITY OF THE TANK – DO NOT PROCEED IF TANK SHOWNS EVIDENCE OF ANY CRACKS, BULGES, OR DISCOLORATION OR IF TANK NOT LOCATED WITHIN SECONDARY CONTAINMENT

Facility Name: _____

Reason for Test ___ 5 Year Integrity Check ___ Increase in Severity of Service
___ New Tank ___ Major Repair (type): _____

--- TANK INFORMATION ---

Tank Identification: _____ Capacity (gal): _____

Tank Shell Material (circle): Bare Steel Coated Steel Lined – Date Installed _____
Fiberglass Double Wall Polyethylene Other: _____

Date Installed (approx.): _____ Last Repair/Change in Service Date: _____

Design Specification (circle): API 650 ASTM D 1998-97 Unknown Other: _____

Manufacturer: _____ Vendor Purchased from: _____

Dimensions: Height_____ (ft) Diameter:_____ (ft) or Circumference: _____ (ft)

Check if present: ___ Overfill Protection ___ Contents Label ___ NFPA Label
___ Cathodic Protection ___ High Level Alarm ___ Sight Glass/Gauge
___ Emergency Vents ___ Other _____

Contents (product): _____

Tank Used for Blending? Yes No If yes, list final products:

Product: _____ NFPA: ___ Product: _____ NFPA: ___
Product: _____ NFPA: ___ Product: _____ NFPA: ___
Product: _____ NFPA: ___ Product: _____ NFPA: ___

Containment (circle): Earthen Dike Concrete Synthetic Liner Other: _____

STEP 1: VISUALLY INSPECT TANK	YES	NO
1. Hairline or larger cracks in shell surface visible		
2. Shell surface shows signs of pitting or indentations.		
3. Tank is not uniform in color. Some areas appear "brighter" or discolored from the rest of the tank.		
4. Tank shell is not uniform – appears to bulge in areas.		
5. Seams are ragged or are not smooth to the touch.		
6. Seal on valve is rusted or area below valve shows signs of staining.		
IF YOU ANSWERED YES TO ANY OF THE ABOVE – STOP THE TEST CONTACT QHSE REPRESENTATIVE		
STEP 2: VISUALLY INSPECT SECONDARY CONTAINMENT		
1. Dirt, leaves, or other debris is present within secondary containment.		
2. Spills or other liquid is present within the secondary containment.		
3. Hairline cracks on the dike walls are present.		
4. Seams are not sealed on dike wall.		
IF YOU ANSWERED YES TO ANY OF THE ABOVE – STOP THE TEST CONTACT QHSE REPRESENTATIVE		

Step 3: Fill Tank to a Minimum of 75% Total Capacity
Tank Capacity: _____ x 0.75 = _____ gallons

WARNING: Tank will be OUT OF SERVICE for duration of test – 24 Hours
NOTE: Tank may be filled with either water or product except for new tanks. New must be tested using water prior to putting into service.

DO NOT LEAVE TANK UNATTENDED FOR MORE THAN 6 HOURS - MUST CHECK TANK VISUALLY AT LEAST ONCE EVERY 6 HOURS

1. Check weather forecast – if more than 20% chance of precipitation do not perform test.
2. Review MSDS if using Product.
3. Based upon MSDS – verify proper Personal Protective Equipment (PPE) including respirator is present and ready for use.
4. Verify sufficient empty drums or other containers are present to pump tank contents into in the event the tank fails.
5. Ensure equipment including pump and hoses that may be needed to pump contents into another container have been inspected and are ready.
6. Fill tank to 75% capacity. Immediately check for leaks (first entry in table).
7. Visually inspect tank once every two hours for a minimum of twelve hours then at a minimum of once every six hours.

Facility Name: Start Time/Date (tank at 75% capacity) End Time/Date

Time	Leaks from Valve	Change in Shell Color	Leaks from Seams	Sides Bulging	Comments
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	
	Y N	Y N	Y N	Y N	

Circle: TANK MAINTAINED INTEGRITY (NO LOSS OF PRODUCT/WATER) – PASS
TANK FAILED – PRODUCT/WATER LOSS (SHELL OR VALVE) – CONTACT QHSE REPRESENTATAIVE

Inspector Name	Inspector Signature	Date	Facility Manager Name	Facility Manager Signature	Date

Appendix K: Onsite Portable Container Storage

Product Full Name	Common name	Product Type	Solubility	Onsite Storage (gal)
Acetic Acid, 80%	Acetic Acid	Raw Material	Water	108
Ethylene Glycol, MEG	Ethylene Glycol	Raw Material	Water	2171
EGMBE	EGMBE	Raw Material	Water	74
Cortron RN-482FB	RN-482FB	Cortron	Water	1612
Gyptron T-423	T-423	Gyptron	Water	110
Bactron K-103 Ind. Antimicrobial	K-103	Bactron	Water	16
Bactron K-31 Antimicrobial	K-31	Bactron	Water	1044
Bactron K-77 Antimicrobial	K-77	Bactron	Water	1108
Captron 75	Captron 75	Captron	Water	220
Cortron R-2264	R-2264	Cortron	Water	1030
Cortron R-2340	R-2340	Cortron	Water	660
Cortron R-2378	R-2378	Cortron	Oil	660
Cortron R-2479	R-2479	Cortron	Oil	880
Cortron RH-67	RH-67	Cortron	Water	55
Cortron RN-178	RN-178	Cortron	Water	1414
Cortron RN-234	RN-234	Cortron	Water	1282
Cortron RN-234FB	RN-234FB	Cortron	Water	660
Cortron RN-249	RN-249	Cortron	Water	550
Cortron RU-160	RU-160	Cortron	Water	842
Cortron RU-206	RU-206	Cortron	Water	295
Defoamer V-106	V-106	Defoamer	Oil	55
D-Tron S-27	D-Tron S-27	D-Tron	Oil	262
Emulsotron X-1021	X-1021	Emulsotron	Oil	55
Emulsotron X-1083	X-1083	Emulsotron	Oil	330
Emulsotron X-1329	X-1329	Emulsotron	Oil	220
Emulsotron X-1439	X-1439	Emulsotron	Water	715
Emulsotron X-435	X-435	Emulsotron	Oil	625
Emulsotron X-606	X-606	Emulsotron	Oil	275
Emulsotron X-711	X-711	Emulsotron	Oil	370
Emulsotron X-798b5	X-798b05	Emulsotron	Oil	391
Flexoil FM-114	FM-114	Flexoil	Oil	330
Flexoil FM-150	FM-150	Flexoil	Oil	440
Flotron M-152	M-152	Flotron	Water	495
Flotron M-153	M-153	Flotron	Water	448
Flotron M-202	M-202	Flotron	Oil	385
Flotron M-45	M-45	Flotron	Oil	275
Foamatron EFP-1601	EFP-1601	Foamatron	Water	425
Foamatron EFP-1602	EFP-1602	Foamatron	Water	55
Foamatron V-74	V-74	Foamatron	Water	17
Foamatron VDF-127	VDF-127	Foamatron	Water	580
Gas Treat 136	GT-136	Gas Treat	Water	440
Gyptron T-144	T-144	Gyptron	Water	330
Gyptron T-164	T-164	Gyptron	Water	495
Gyptron T-167	T-167	Gyptron	Water	275
Gyptron T-249	T-249	Gyptron	Water	7095
Gyptron T-356	T-356	Gyptron	Water	1100

Appendix K: Onsite Portable Container Storage

Product Full Name	Common name	Product Type	Solubility	Onsite Storage (gal)
Gyptron T-94	T-94	Gyptron	Water	580
Gyptron TA-13	TA-13	Gyptron	Water	165
Gyptron TC-30	TC-30	Gyptron	Water	376
RPA-305	RPA-305	RPA	Oil	1354
Scortron GR-123B	GR-123B	Scortron	Water	1500
Scortron GR-153	GR-153	Scortron	Water	373
Scortron GR-99B	GR-99B	Scortron	Water	1491
Surfatron 613	613	Surfatron	Water	26
Surfatron DN-98	DN-98	Surfatron	Oil	731
Surfatron DP-61	DP-61	Surfatron	Water	242
Surfatron DP-69	DP-69	Surfatron	Water	845
Surfatron DQ-86	DQ-86	Surfatron	Water	770
Surfatron DT-45	DT-45	Surfatron	Oil	330
Surfatron DT-78	DT-78	Surfatron	Oil	58
Surfatron DT-80	DT-80	Surfatron	Water	2694
				42809

Total Oil Storage	8,026 Gallons
Total Chemical Storage	42,809 Gallons

Champion Technologies
Hobbs, NM
GW-199

Public Notice – Proposed Language

Champion Technologies
Hobbs, NM
GW-199

Proposed Newspaper Public Notice

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

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Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

Champion Technologies

James Hamilton
Champion Technologies
415 West Wall Suite 105
Midland, TX 79701

April XX, 2011

Recipient Name
Company Name
Street Address
[City, ST ZIP Code]

Dear [Recipient Name]:

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Sincerely,

Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

James Hamilton
Western Region HSE Manager

Champion Technologies
Hobbs, NM
GW-199

Proposed Signs - Public Notice

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION (OCD)

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Champion Technologies
Hobbs, NM
GW-199

Public Notice – Proposed Language

Champion Technologies
Hobbs, NM
GW-199

Proposed Newspaper Public Notice

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

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Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

Champion Technologies

James Hamilton
Champion Technologies
415 West Wall Suite 105
Midland, TX 79701

April XX, 2011

Recipient Name
Company Name
Street Address
[City, ST ZIP Code]

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Sincerely,

Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

James Harriton
Western Region HSE Manager

Champion Technologies
Hobbs, NM
GW-199

Proposed Signs - Public Notice

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION (OCD)

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Champion Technologies
Hobbs, NM
GW-199

Public Notice – Proposed Language

Champion Technologies
Hobbs, NM
GW-199

Proposed Newspaper Public Notice

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

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Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

James Hamilton
Champion Technologies
415 West Wall Suite 105
Midland, TX 79701

April XX, 2011

Recipient Name
Company Name
Street Address
[City, ST ZIP Code]

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Sincerely,

Champion Technologies
Hobbs, NM
GW-199

Proposed Letter - Public Notice

James Hamilton
Western Region HSE Manager

Champion Technologies
Hobbs, NM
GW-199

Proposed Signs - Public Notice

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION (OCD)

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ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No _____ dated 4/18/11

or cash received on _____ in the amount of $ 100.00

from Champion Technologies

for GW-199

Submitted by Lawrence Romero Date 7/28/11

Submitted to ASD by Karen Romero Date 7/28/11

Received in ASD by _____ Date _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

August 09, 2007

Mr. Monty Bohanan
District Manager
Champion Technologies
4001 S. Highway 18
Hobbs, NM 88240

Re: Discharge Permit GW-199
Hobbs Yard

Dear Mr. Bohanan:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Champion Technologies (owner/operator) Hobbs Yard GW-199 located in the NE/4 SE/4 of Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

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

If you have any questions, please contact Wayne Price me at (505-476-349o) or E-mail Wayne.price@state.nm.us On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
CHAMPION TECHNOLOGIES, HOBBS YARD (GW-199)
DISCHARGE PERMIT APPROVAL CONDITIONS
August 09, 2007

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the owner/operator still owes the required $1700.00 renewal permit fee for an oilfield service company.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on May 01, 2011** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

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

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its January 01, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

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

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

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

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

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

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

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

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

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

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

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

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

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

12. Underground Process/Wastewater Lines:

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

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

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

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

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

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

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

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

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

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

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

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

CHAMPION TECHNOLOGIES
Company Name-print name above

MONTY BOHANAN
Company Representative- print name

Monty Boha
Company Representative-signature

Title District MANAGER

Date: 9-5-07

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 3/1/07

or cash received on _____ in the amount of $ 1700.00

from Chamfron Technologies

for GW-199

Submitted by: Lawrence Romero Date: 4/9/07

Submitted to ASD by: Lawrence Romero Date: 4/9/07

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT: 7000 0600 0023 3737 3447

October 10, 2001

Wayne Price
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan FW-199
Champion Technologies Hobb's, New Mexico Facility

Dear Mr. Price:

Find enclosed a signed copy of the Discharge Plan approval conditions by a company officer. If there are any questions, please contact me at 281-431-2561

Sincerely,

Ralph Corry

Ralph Corry
Environmental Specialist

RC/tb

Cc: Mel Davis
Nick Grahmann
Tommy Morrison

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 13, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 3771 7255

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: Renewal of Discharge Plan GW-199
Champion's Hobbs, NM Facility

Dear Mr. Corry:

The groundwater discharge plan GW-199 for the Champion Technologies, Inc. Corp., Hobbs Facility, located in the NE/4 SE/4, Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan application was submitted on May 19, 1995 and approved on May 01, 1996 with an expiration date of May 01, 2001. The discharge plan renewal application dated December 18, 2000 and subsequent submittals dated May 01, 2001, May 17, 2001and July 20, 2001 including attachments, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Champion Technologies, Inc. Corp. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Champion Technologies, Inc. Corp. of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Champion Technologies, Inc. Corp. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire May 01, 2006** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the Champion Technologies, Inc. Corp., Hobbs Facility, is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $100.00 ($50.00 if filed before January 15, 2001) plus a flat fee of $1700.00 for oilfield service companies. The OCD has not received the $1700.00 flat fee. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval and subsequent installments due on this date of each calendar year.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-1
Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-199 APPROVAL
Champion Technologies, Inc. Corp., Hobbs Facility
DISCHARGE PLAN APPROVAL CONDITIONS
September 13, 2001

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee of $1700.00 for oilfield service companies. The flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.

2. Commitments: Champion Technologies, Inc. Corp. will abide by all commitments submitted in the discharge plan renewal application dated December 18, 2000 and subsequent submittals dated May 01, 2001, May 17, 2001 and July 20, 2001 including attachments, and these conditions for approval.

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

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

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

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

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every year from tested date, thereafter. Permittees may propose various methods for testing such as 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. The test results will be submitted to OCD by December 31, 2001.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by December 31, 2001.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspections will be retained on site for a period of five years.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. And WQCC 1203. to the OCD Hobbs District Office.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

    Rule 712 Waste: Disposal of Certain Non-Domestic Waste At Solid Waste Facilities permitted by the New Mexico Environmental Department.

    A. Waste Listed in Subsection D, Paragraph (1) of Section 19.15.9.712. Waste listed in Subsection D, Paragraph (1) of Section 19.15.9.712 may be disposed of at a solid waste facility without prior written authorization of the Division.

    B. Waste Listed in Subsection D, Paragraph (2) of Section 19.15.9.712. Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 may be disposed of at a solid waste facility after testing and prior written authorization of the Division. Before authorization is granted, copies of test results must be provided to the Division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the Division. In appropriate cases and so long as a representative sample is tested, the Division may authorize disposal of a waste stream listed in Subsection D, Paragraph (2) of Section 19.15.9.712 without individual testing of each delivery.

    C. Waste Listed in Subsection D, Paragraph (3) of Section 19.15.9.712. Waste listed in Subsection D, Paragraph (3) of Section 19.15.9.712 may be disposed of at a solid waste facility on a case-by-case basis after testing required at the discretion of the Division and after prior written authorization of the Division. Before authorization is granted, copies of test results must be provided to the Division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water Plan: Champion Technologies, Inc. Corp. (CT) shall maintain stormwater runoff controls as submitted in the discharge plan Section XIII "Stormwater Plan". As a result of CT's operations if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off then CT shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. CT shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Vadose Zone and Water Pollution: The existing vadose zone and water pollution shall be abated pursuant to the Abatement Plan (AP-14) required by OCD on April 26, 1999.

17. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

19. Certification: **Champion Technologies, Inc. Corp.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Champion Technologies, Inc. Corp.** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Champion Technologies, Inc. Corp.**

ROBERT K. HONEA
Company Representative- print name

Robert K Honea Date 9/20/01
Company Representative- Sign

Title VICE PRESIDENT

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

September 13, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3771 7255

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: Renewal of Discharge Plan GW-199
Champion's Hobbs, NM Facility

Dear Mr. Corry:

The groundwater discharge plan GW-199 for the Champion Technologies, Inc. Corp., Hobbs Facility, located in the NE/4 SE/4, Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

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Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

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Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-1
Xc: OCD Hobbs Office

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Champion Technologies, Inc. Corp., Hobbs Facility
DISCHARGE PLAN APPROVAL CONDITIONS
September 13, 2001

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    C. Waste Listed in Subsection D, Paragraph (3) of Section 19.15.9.712. Waste listed in Subsection D, Paragraph (3) of Section 19.15.9.712 may be disposed of at a solid waste facility on a case-by-case basis after testing required at the discretion of the Division and after prior written authorization of the Division. Before authorization is granted, copies of test results must be provided to the Division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the Division.

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Conditions accepted by: **Champion Technologies, Inc. Corp.**

_____
Company Representative- print name

_____Date____
Company Representative- Sign

Title_____

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Oilfield Chemical Distribution Site

2. Operator

	Corporate Headquarters	Facility Location
Address:	3200 Southwest Freeway, Suite 2700 Houston, Texas 77027	4001 South Highway 18 Hobbs, New Mexico, 88240
Contact Person/Phone:	Juan Alvarado: (713) 590-3556	Monty Bohanan: (505) 393-7726 James Hamilton: (432) 563-0142

3. Location: NE/4 SE/4 Section 15 Township 19S Range 38E
Submit large scale topographic map showing exact location – see attached Figure 1 and 2

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

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

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

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

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

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

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

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

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

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

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

Name: MONTY BOHANAN Title: DIST. MGR

Signature: Monty Bohanan Date: 1-25-07

E-mail Address: MONTY.BOHANAN@champ-tech.com

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

Champion Technologies owns the property.

4001 South Highway 18
Hobbs, New Mexico, 88240
Monty Bohanan (District Manager) - (505) 393-7726
James Hamilton (Regional QHSE Representative) - (432) 563-0142

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

A general Facility Site Map is provided in Figure 3 with detail East and West Bulk Tank Area Maps provided in Figure 4 and 5, respectively.

The Champion Technologies Hobbs, New Mexico facility is a bulk distribution center for water-based and oil-based chemicals used for down-hole treatment of oil and gas wells in western Texas and New Mexico. The facility is located approximately 1.7 miles south of Hobbs and encompasses an area of approximately 7 acres on the east side of Highway 18. The facility is bordered by Highway 18 on the east side, undeveloped land on the west side, a residence and undeveloped land used for cattle ranching on the south side, and another oilfield service company on the north side. The facility is completely enclosed by a chain link fence with an entrance through a gate facing the highway or through the office building and is equipped with outdoor lighting to illuminate the facility at night.

The Hobbs facility is located on a topographic high compared to the surrounding area. The facility grounds exhibit little topographic relief with a slight slope from east to west. Storm water flow is towards the west side of the facility where it travels approximately ¼ miles before it follows the surface counters to the southeast where it intersects with Monument Draw, approximately four miles southeast of the facility.

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

As a bulk distribution center for water-based and oil-based chemicals used for down-hole treatment of oil and gas wells, the Hobbs facility stores a large range of products to meet clients' needs. Products generally fall into one of fourteen groups which are described in Table 1. The facility has a chemical bulk storage capacity of 160,500 gallons, based upon the AST capacity. A list of the tanks, contents, and size is provided in Table 2. The facility on average stores four hundred 55-gallon drums and two hundred 375-gallon totes. Drums/totes are stored within secondary containment in the Drum/Tote Storage Area #1, Drum/Tote Storage Area #2, or the warehouse. While the drum/tote inventory varies based upon clients' needs and seasonally, contents for drums/totes at the facility will be one of the fourteen groups described in Table 1. Chemical storage locations are shown on the Facility Site Map provided in Figure 3 with detail East and West Bulk Tank Area Maps provided in Figure 4 and 5, respectively.

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

Effluent

The office and warehouse generates paper waste, food, and general wastes associated with day to day office activities which are picked up weekly by Waste Management. Waste Management hauls the office trash to Lea County Landfill.

Domestic sewage is generated from the office and warehouse areas. Sewage from these two building flows into an underground septic tank system and then is dispersed onto the leachfield. The septic system was installed in October, 1993 and was issued a liquid waste permit from the New Mexico Environment Department Community Service

Bureau HO930060. Since its issuance in 1993, the Hobbs facility has upgraded/performed maintenance on the septic system and has been issued a new permit for each. The current permit number is HO020063 and is in good standing with no variances.

Per 20.7.3 New Mexico Administrative Code Table 20.1 the design flow rate requirements for a commercial facility with an office is 20 gallons per person per day with an average working day of 8 hours. The Hobbs septic system is designed for 240 gallons or for twelve full time employees. The Hobbs facility has five people who are stationed at the facility throughout the day (eight hours per day). There are twenty salespersons or truck drivers that operate out of Hobbs, however, these people average being onsite less than one hour per day which is equivalent to 2.5 people per day. The average daily load to the septic system is 7.5 people or approximately 150 gallons per day.

The facility does not have an onsite wastewater treatment system. Vehicles are washed offsite at a local vendor's location and not at the facility. Vehicle maintenance is also performed by an offsite vendor at their location.

Waste Solids

The Hobbs, New Mexico facility is a registered conditionally exempt small quantity generator (CESQG) with a facility Resource Conservation and Recovery Act (RCRA) identification number of NMD986674869. All media that may come in contact with chemicals is evaluated to determine if it is hazardous or non-hazardous. Below is a listing of anticipated waste streams at the Hobbs facility.

A. Accumulated Storm Water/Snow Melt Within Secondary Containment
Storage Location – East Bulk Tank Area, Drum/Tote Storage Area #1, and Drum/Tote Storage Area #2
Storage Container – Drum or Tote

Hobbs, New Mexico is located in an arid climate with an average annual precipitation of 16.49 inches according to the National Weather Service (http://www.srh.noaa.gov/maf/Coop_Climate/annhobbs.html). Hobbs, New Mexico is located in the Southeast Plains region with an estimated 25 year, 24 hours storm event of 2.0 to 4.5 inches for the region (http://pubs.usgs.gov/fs/fs-055-00/).

Due to the arid climate, storm events generally have a limited amount of accumulation and accumulated storm water and/or snowmelt quickly evaporates. The West Bulk Tank Storage Area, Drum/Tote Storage Area #1, and Drum/Tote Storage Area # 2 do not have drains and require that accumulated storm water and/or snowmelt be pumped out manually. If accumulated precipitation would need to be pumped out, the facility would follow the procedure listed in Section 13 – Storm water and fill out the drainage discharge form in Table 3.

The East Bulk Tank Farm has an earthen floor and accumulated stormwater/snowmelt infiltrates into the ground. In addition to general facility good housekeeping and inspections, portable drip pans are used at both valve openings associated with the single hose during loading/unloading operations to catch drips/leaks. The East Bulk Tank Storage Area was described in the 2001 Discharge Plan (existing facility). The West Bulk Tank Farm is scheduled to be phased out/removed by January 1, 2008.

B. Site Investigation/Remediation Derived Wastes
Storage Location – Drum/Tote Storage Area (concrete pad with curbing)
Storage Container - Drum

The Hobbs location is currently working with the New Mexico Oil Conservation Division (NMOCD) regarding chromium in groundwater (AP-14). As part of this project, site investigation and remediation derived wastes are generated. These wastes are characterized and then picked for disposal by a licensed transporter to an ODC approved landfill depending on its characterization. To date, all site investigation/remediation derived waste has been non-hazardous. The quantity generated varies depending on site investigation/remediation activities.

C. Absorbents
Storage Location – Drum/Tote Storage Area (concrete pad with curbing)
Storage Container – Drum
If a spills or a leak occurs, it may be cleaned up with the use of absorbents. Several absorbents are stored onsite in the Spill Kit as a contingency measure. Once the absorbents are used, they are stored on-site in a closed, labeled container (designated 55-gallon drum). Once the container is full, the absorbents are characterized and transported by Univar to an approved ODC location. The quantity of absorbents averages less than one drum per year. Spills are managed in accordance to procedures described in the Spill Prevention, Control and Countermeasure (SPCC) Plan. A copy of the SPCC Plan is included as Appendix A.

D. Empty Drums
Storage Location – South of both of the Bulk Storage Tank areas

During facility operations, drums are used to transport products to several clients in the surrounding area. When drums are empty, they are returned to the facility. If necessary, the facility may suck out remaining product into another drum (see waste stream F) to achieve the empty container requirement of less than one inch remaining in a drum, per Resource Conservation and Recover Act (RCRA). These drums are then picked up by West Texas Drums for recycling.

NOTE: empty drums are not considered to be hazardous material

E. Residual Products
Storage Location – Drum/Tote Storage Area (concrete pad with curbing)
Storage Container – Drum or Tote

Residual products may be generated when empty drums return from the field and do not meet the requirements set forth by RCRA for an empty drum (see waste stream E – empty drums). These drums are pumped out manually and the residual products are placed within a labeled 55-gallon drum. Generally the quantity removed is less than ½ gallon. Based upon product knowledge, the residuals from Champion Products are compatible and are combined.

The Hobbs facility generates less than 2 drums on average per year of this material. When the facility has accumulated one drum, Champion personnel contact Univar, a hazardous waste broker, to assist with the characterization and disposal of this waste. The residual product drum is labeled as hazardous waste and is stored at the Drum/Tote Storage Area #2 within secondary containment.

Up until January 2007, Hobbs was a conditionally exempt small quantity generator. Due to a change in how the facility manages residual products, Hobbs will become a large quantity generator for the month of January, 2007. In January 2007, the Hobbs facility submitted the RCRA Subtitle C Site Identification Form to update the generator status for the facility. Based upon the operations at Hobbs, it is anticipated that this form will be resubmitted following completion of these activities and the facility will operate for the remainder of 2007 and subsequent years as a CESQG.

F. Off Specification and Obsolete Products
Storage Location – Drum/Tote Storage Area (concrete pad with curbing)
Storage Container – Drum or Tote

Occasionally some products may be off-specification or become obsolete. These products are evaluated to determine if they can be reused at another facility or as part of another finished product. The Hobbs facility generates less than 2 drums on average per year of this material. When the facility has accumulated one drum, Champion personnel contact Univar, a hazardous waste broker, to assist with the characterization and disposal of

this waste. The residual product drum is labeled as hazardous waste and is stored at the Drum/Tote Storage Area #2 within secondary containment.

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

A – Summary Information: See response from question #7, Table 2, and Figures 3, 4, and 5 for facility maps

B – Collection and Storage Systems

The Hobbs facility has twenty-eight aboveground storage tanks (ASTs), one drum/tote storage area, warehouse, and office. There are two bulk storage tank areas: East and West. Both storage tank areas have sufficient secondary containment to exceed the requirements in the Spill Prevention, Control, and Countermeasure (SPCC) Rule and the New Mexico Discharge Plan requirement of 133% containment of the largest tank (calculation provided on Figure 4 and 5).

The East Bulk Tank Storage Area contains twenty-four ASTs with secondary containment consisting of a concrete floor with a 1.42 foot concrete dike wall. This tank farm was installed in August 2006. The remaining four ASTs are located within the West Bulk Tank Storage Area, were described in the 2001 Discharge Plan, and are stored within secondary containment consisting of an earthen floor and 0.5 foot wood walls. At the time this Discharge Plan was developed, one of the ASTs in the West Bulk Tank Storage Area is empty. The remaining three ASTs are in the process of being phased out and will be phased out/removed by January 1, 2008.

Drums and totes are stored within either Drum/Tote Storage Area #1 or #2. Drum/Tote Storage Area #1 has a concrete floor and a 2 foot dike wall. The Drum/Tote Storage Area #2 has a concrete pad with 6 inch curbing. Drums and totes are also stored within the warehouse. There are no shop floor drains located within the warehouse.

All tanks and lines are aboveground.

C – Existing Effluent and Solids Disposal

Hobbs, New Mexico facility does not dispose of any waste on-site. Hobbs does not have an onsite wastewater treatment facility, surface impoundments, oil skimmer pits, emergency pits, shop floor drains, sumps, etc. A full discussion on domestic sewage and the septic system at Hobbs is provided in Section 7. Champion Technologies has contracted Univar, a waste broker, to assist with characterization, transport, and disposal of all non-hazardous and hazardous material. Based upon the materials characterization, Univar will arrange for disposal at an approved disposal location.

The contact information for Univar is provided below.
Univar USA
311 S Lark Avenue
Odessa, Texas 79762
(432) 366-3243

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

Both storage tank areas and the drum/tote storage area have sufficient secondary containment to exceed the requirements of the SPCC Rule and the New Mexico Discharge Plan requirement of 133% containment of the largest container (calculation provided on Figure 4 and 5). The facility does not have surface impoundments, pits, etc.

A full discussion on domestic sewage and the septic system at Hobbs is provided in Section 7. No modifications to the septic system are anticipated at this time.

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

Daily Inspection
All Champion Technology personnel are trained on spill prevention measures. During their daily activities, prior to starting work for the day and prior to leaving, a visual inspection of their area is performed. If leaks or spills are identified these inspections they are reported and cleaned up immediately as part of good housekeeping practices.

Weekly, Annual, and Periodic Inspections
A description and copy of the blank forms associated with the weekly, annual, and periodic inspections and annual inspections are included in the attached SPCC Plan.

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

See attached SPCC Plan

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

The Hobbs, New Mexico facility is working with the New Mexico Oil Conservation Division as part of an ongoing site investigation. The facility identification number is AP-14. A site map showing the location of monitoring wells in relation to the facility buildings is shown in Figure 6. For site specific geology and hydrology, please refer to the submitted Site Investigation Report dated September 12, 2000 for the Champion Technologies, Inc. at Hobbs, New Mexico. Hydrology section is presented in Appendix B. Additional subsequent reports providing updates and closure on specific chemical of concern (COCs) are also on file with the New Mexico OCD.

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

Water Well
Two water wells have been drilled at the Hobbs facility. The first well was located on the northwest side of the property and has been plugged and abandoned. Within 3 months of the date of the plan, the driller's log which indicates the methodology utilized to plug and abandon the well in place will be submitted to the New Mexico's Office of the State Engineer. A second water well was drilled and provides non-potable water to the facility (i.e. bathrooms). An outside vendor provides drinking water to the facility.

Storm Water Plan

The 2001 OCD Plan previously submitted provided the following procedures that would be followed at the Hobbs Facility.

A. All production chemicals are to be kept in secondary containment.
B. All containers of materials must be stored on pallets so that leaks can be detected immediately.
C. The storage areas are to be inspected twice weekly.
D. Any leaking pumps, valves, liens, and/or containers are to be repaired immediately. The contaminated secondary containment area must be cleaned.
E. Any transferring of chemicals must be performed inside secondary containment area, if possible.
F. The entire facility to be inspected twice weekly for leaks or possible leaks.
G. All drainage valves on secondary containment areas should be inspected for any visible contamination such as an oil sheen or discoloration. If no visible sign of contamination is observed, then the drainage valve can be

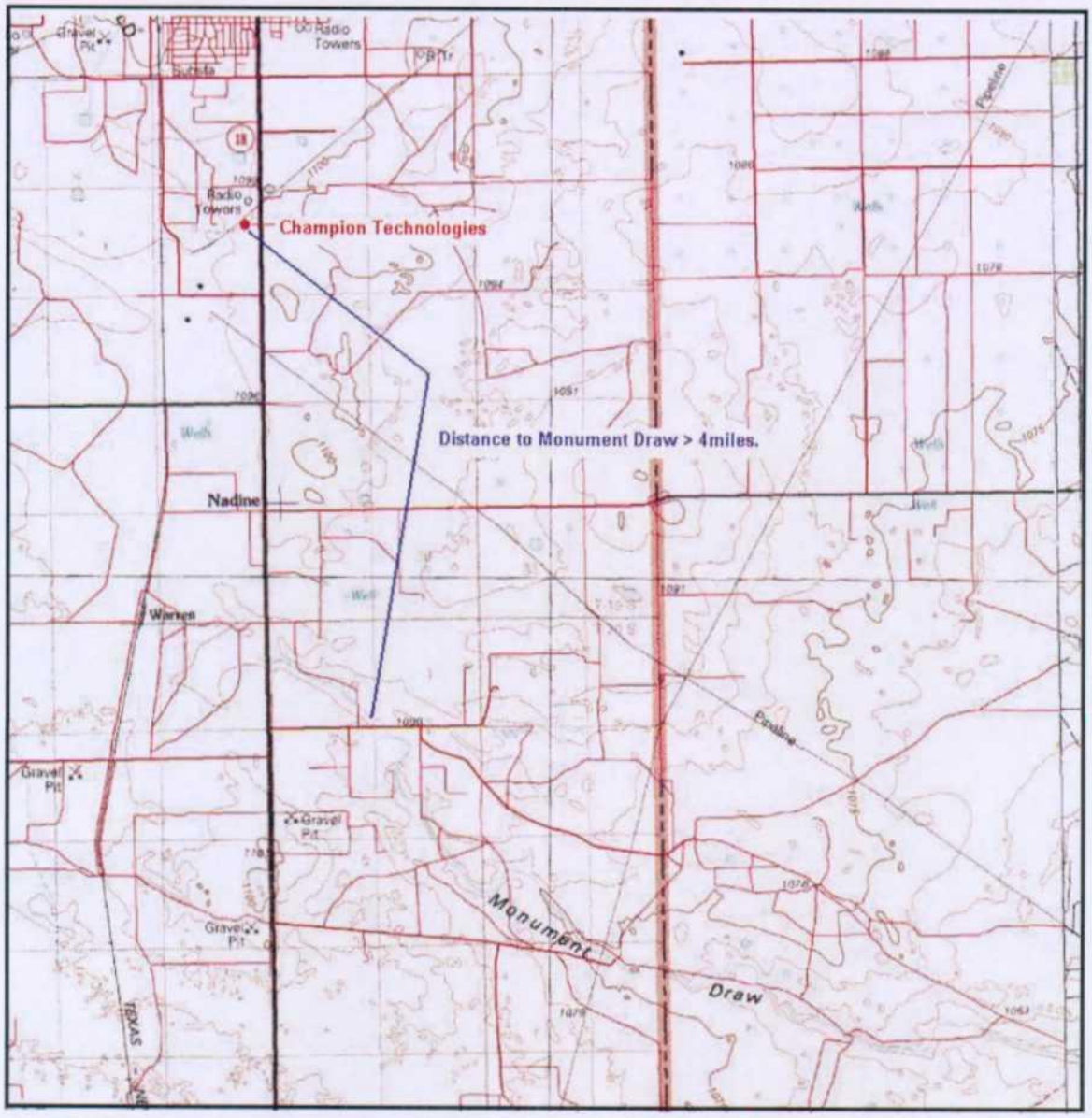
opened and the water discharged. If there is contamination, then a determination will need to be made of what type contamination and how to dispose of it at a permitted disposal facility.

The OCD Approval letter requires compliance with the above stated plan. Champion Technologies would like to amend the plan to the following.

A. All production chemicals are to be kept in secondary containment.
B. All containers of materials must be stored on pallets within the warehouse so that leaks can be detected immediately. Drums/totes stored on the concrete pad with a six inch curb and speed bump entrance to maintain containment may be stored directly on the ground.
C. The storage areas are visually inspected daily (Monday through Friday) with a written inspection performed weekly and annually.
D. Any leaking pumps, valves, liens, and/or containers are to be repaired immediately. The contaminated secondary containment area must be cleaned [no change].
E. Any transferring of chemicals must be performed inside secondary containment area, if possible [no change].
F. The entire facility to be inspected weekly for leaks or possible leaks.
G. Following a 0.1 inch or greater storm event, secondary containment structures will be inspected to for any visible contamination such as oil sheen or discoloring. If storm water/snow melt accumulation within secondary containment is greater than 2 inches, the water will be pumped out. If there is no visible sign of contamination, the operator will fill out the storm water discharge form (see Table 3) and release the water. If there is any visual sign of contamination including sheen, floating solids, etc. the accumulated storm water/snow melt will be pumped out into a drum or other container. The storm water/snowmelt will be characterized and then sent off-site for disposal based upon its characterization. [Note: revision required since none of the secondary containment areas have drainage valves].

Figures

Figure 1 – Site Vicinity Map

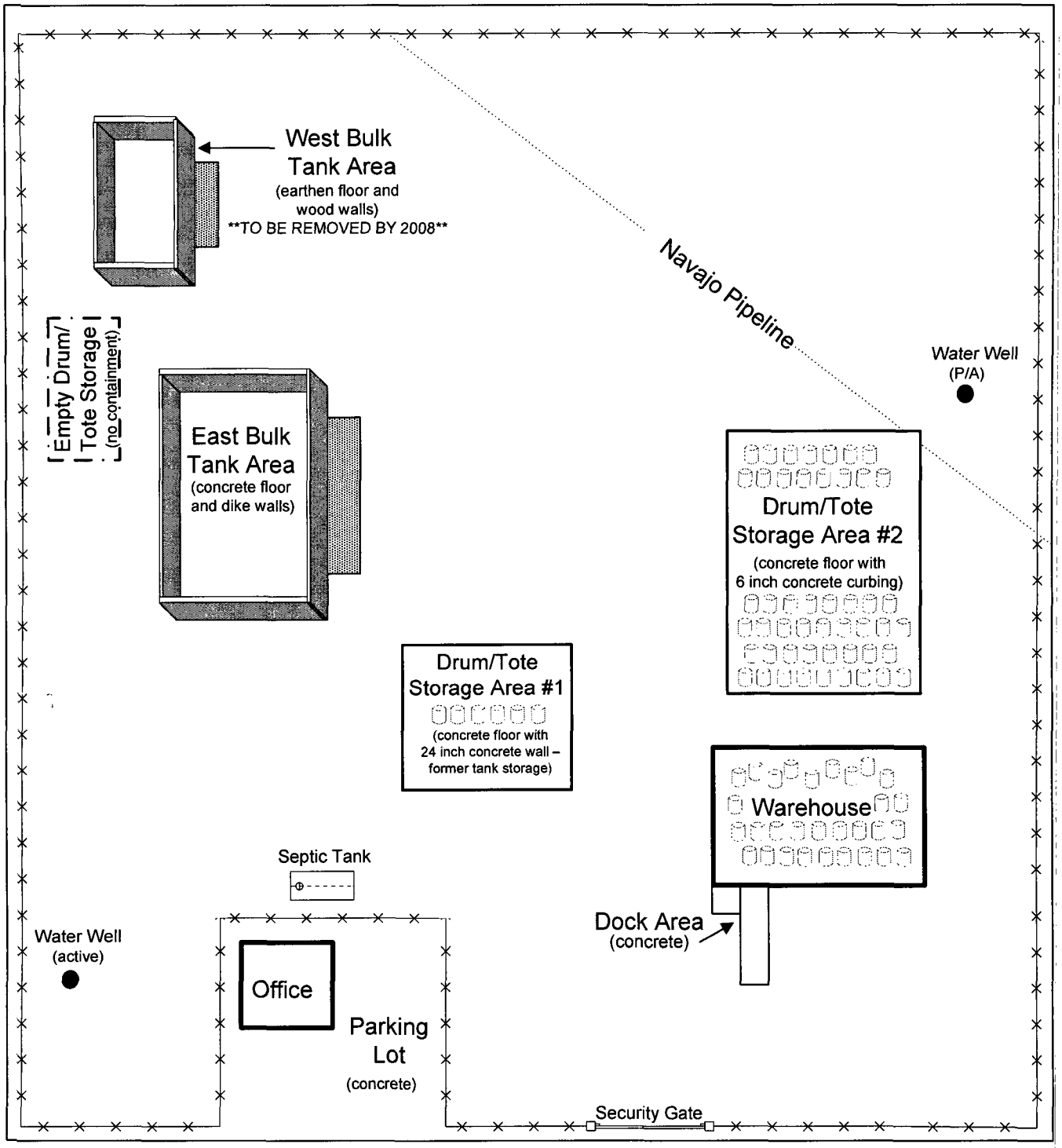


Source: USGS Topographic Map – Hobbs, New Mexico Hobbs, 7/1/1973
(approx. scale: 1 inch = 8,333 ft).

Figure 2 – Site Aerial Map

Source: GoogleEarth: Image 2006 DigitalGlobe

Figure 3 – Site Map
HOBBS, NEW MEXICO



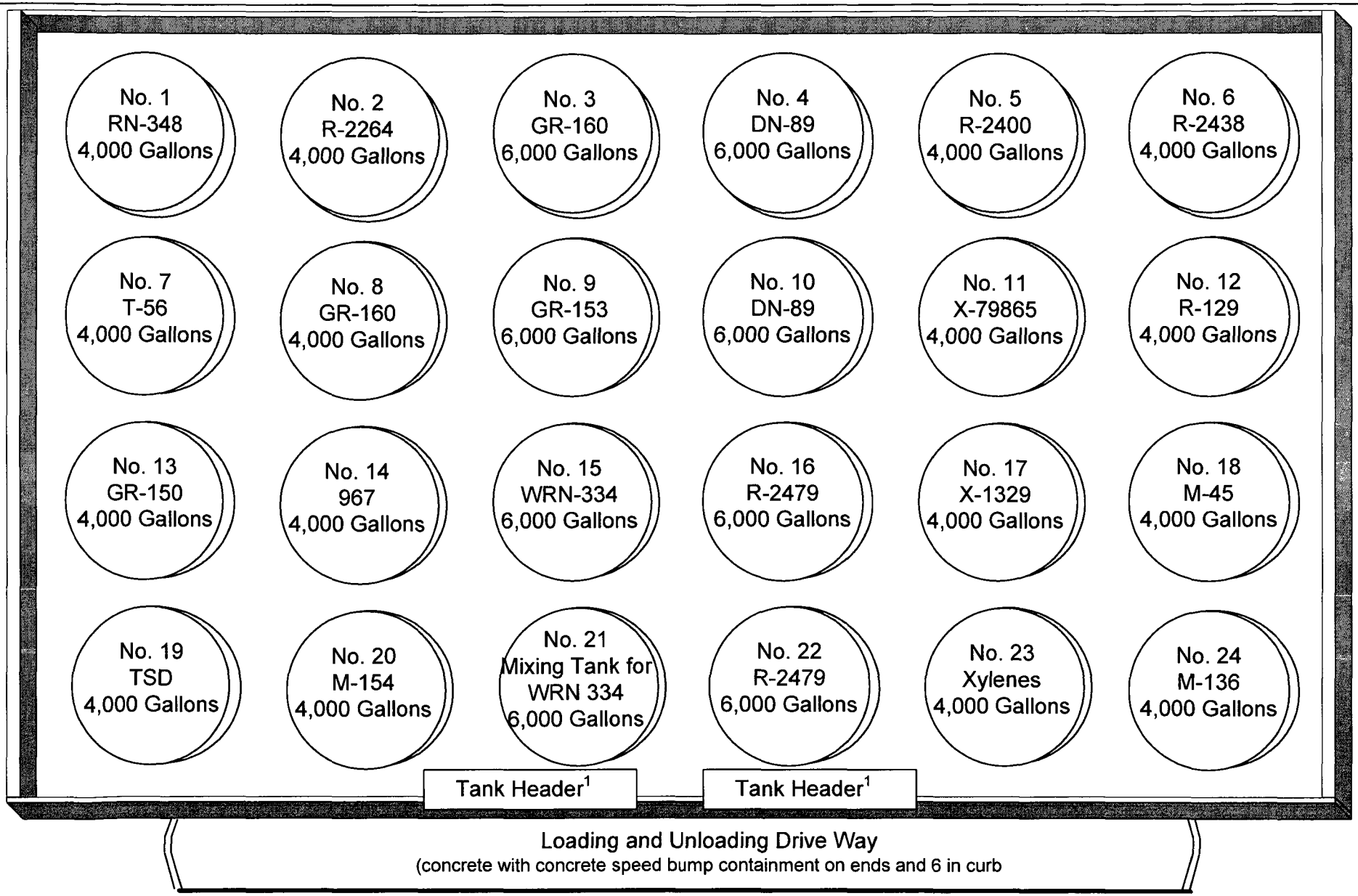
LEGEND

- Property Boundary
- Fence – chain link
- No Containment
- Pipeline
- Drums and Totes
- Transfer Area
- Septic Tank
- Water Well
  P/A – Plugged and Abandoned
  Active – In use

Not to Scale

Champion Technologies

Figure 4 – East Bulk Tank Area
HOBBS, NEW MEXICO



LEGEND

Secondary Containment Summary:

Required: 6,000 gal X 1.33 = 7,980 gal

Calculated: 66,759 gallons – 51,108 gal (displacement) = 15,651 gal

[1] All lines connecting tanks to header system are above ground. Header system has drip pan.

Dike/Berm Wall (concrete)
105 ft X 60 ft with 1.42 ft walls x 7.48 gal/ft3
= 66,759 gallons

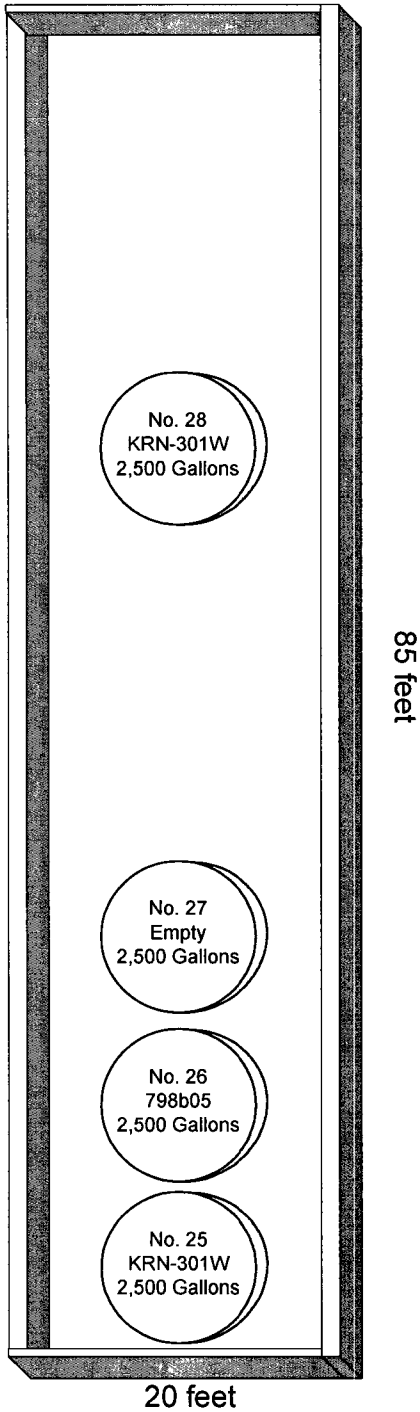
Vertical Tank

Not to Scale

Champion Technologies

Figure 5 – West Bulk Tank Area
HOBBS, NEW MEXICO

NOTE: The West Bulk Tank Area is in the process of being phased out. It is anticipated that all tanks in the West Bulk Tank Area will be removed by January 1, 2008.



LEGEND

Secondary Containment Summary:

Required: 2,500 gal X 1.33 = 3,325 gal

Calculated: 6,358 gallons (85 ft x 20 ft x 0.5 ft x 7.48 gal/ft^3) – 2,642 gallons (displacement) = 3,716 gal

Dike/Berm (earthen floor with 0.5 feet high wood walls

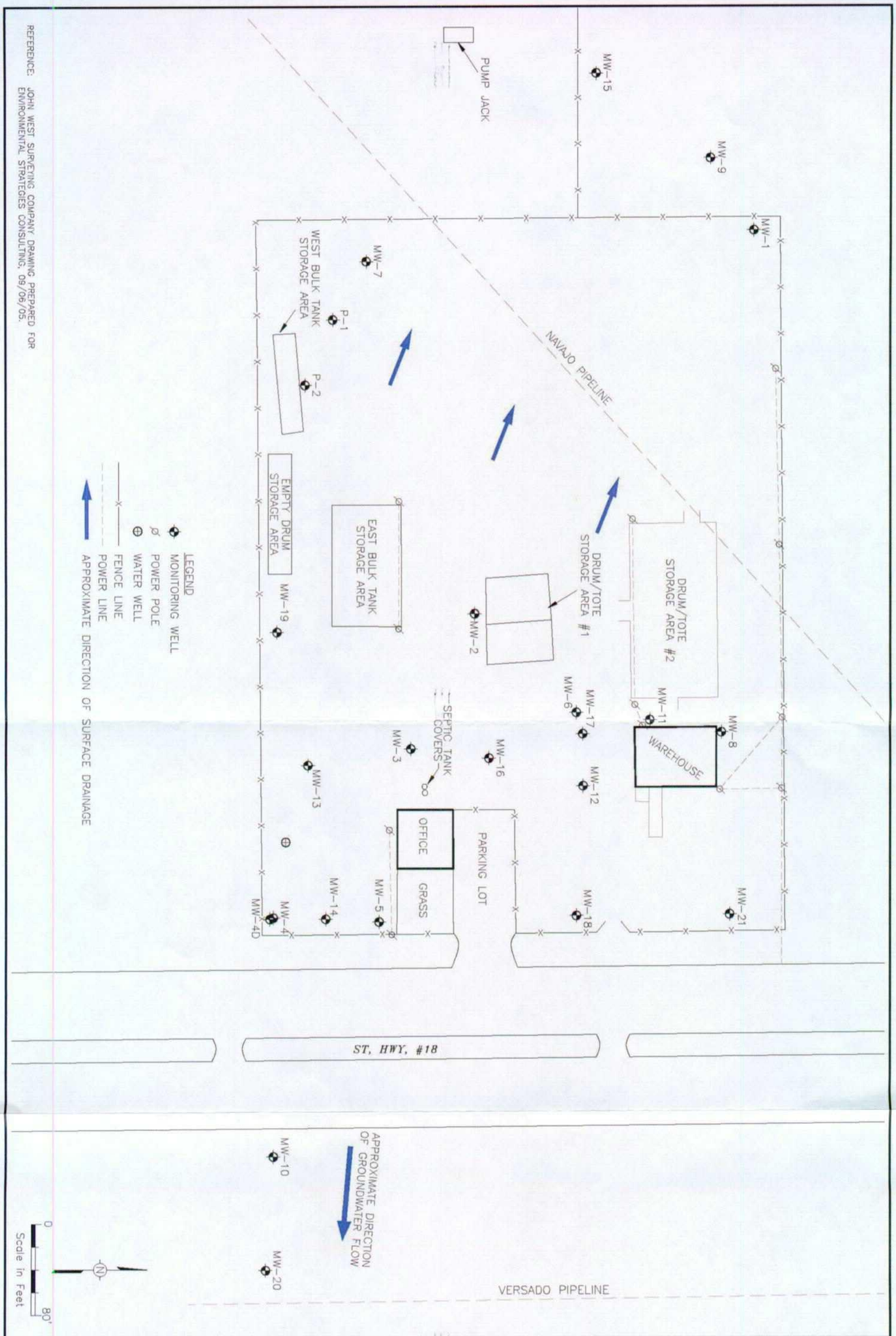
Vertical Tank

Tanks are loaded/unloaded using a single hose line. A drip pan is used to catch spills/drips from the hoses.

N

Not to Scale

Champion Technologies



REFERENCE: JOHN WEST SURVEYING COMPANY DRAWING PREPARED FOR ENVIRONMENTAL STRATEGIES CONSULTING, 09/06/05.

WSP
ENVIRONMENTAL STRATEGIES
4600 South Ulster Street Suite 930
Denver, Colorado 80237
(303) 850-9200

Figure 6
Site Plan
Champion Technologies Inc.
Hobbs, New Mexico

1310422I.DWG

Tables

Table 1: Product Type and Description

Product Type	Product Description
Cortrons	Corrosion inhibitors for the oilfield that normally consist of imadazolines, amines, fatty acids, and various organic solvents. Sometimes the solvent is water. The organic solvents are usually mixed alcohols or heavy aromatic naphtha's.
Scortrons	Combination scale and corrosion inhibitors that normally consist of the same things found in corrosion with the addition of phosphonates, amides, and bisulfites.
Gyptrons	Scale treating compounds for the oilfield that are used either to prevent scale from forming or removing scale. This line normally consists of products based on water soluble phosphonates either in the neutralized or un-neutralized form.
Elulsotrons	Chemicals for treating oilfield oil and water emulsions. This product line normally consists of surfactants in an organic solvent such as heavy aromatic naphtha.
Flexoils	Paraffin treating for the oilfield. Normally consists of high molecular weight polymers in an organic solvent such as xylenes, toluene or heavy aromatic naphtha.
Flotrons	Paraffin treating compounds for the oilfield that generally consist of surfactants in either aqueous or organic solvents. Solvents for organic blends are heavy aromatic naphtha, xylenes, etc. Aqueous blends consist of water, methanol, and isopropanol as the solvent.
Gas Treat	Amine based chemicals for treating sour gas.
Surfatron	A blend of two or more surfactants that enhance wetting and emulsify or disperse oil, water and solids.
Foamatrons	Blends are similar to the Surfatron chemicals.
Defoamers	Organic solvent based chemicals for preventing or removing foam problems in the oilfield.
Bactrons	Bactericides for treating oilfield corrosion problems. These normally consist of aldehyde or quaternary amines.
Cleartrons	Used for water clarification in the oilfield to remove residual amounts of oil from water. These chemicals normally consist of polymers in aqueous solvents
Xylenes and Han	Oil based hydrocarbons used as solvents in the oilfield chemical treatment mixtures.
Methanol and IPA	Alcohol used as solvents in oilfield treatment mixtures.

Table 2 – Bulk Tank Summary

Tank ID	Contents	Product Type	Hazard Rating			Reportable Quantity		Size (gallons)
			H	F	R	Gallons	Chemical Driver	
East Bulk Tank Farm								
1	RN-348	Cortron	1	3	0	2,144	Methanol	4,000
2	R-2264	Cortron	1	3	0	3,143	Methanol	4,000
3	GR-160	Scortron	2	2	0	4,531	Methanol	6,000
4	DN-89	Surfatron	2	3	0	346	Toluene	6,000
5	R-2400	Cortron	3	3	0	622	Xylenes	4,000
6	R-2438	Cortron	2	3	0	25	Diesel	4,000
7	T-56	Gyptron	1	2	0	5,280	Methanol	4,000
8	GR-160	Scortron	2	2	0	4,531	Methanol	4,000
9	GR-153	Scortron	1	2	0	3,896	Methanol	6,000
10	DN-89	Surfatron	2	3	0	346	Toluene	6,000
11	X-798b05	Emulsotron	2	3	0	276	Xylenes	4,000
12	R-129	Cortron	2	3	0	446	Xylenes	4,000
13	GR-150	Scortron	2	2	0	5,848	Methanol	4,000
14	Product 967	Corrosion Inhibitor	3	1	0	11,473	Acetic Acid	4,000
15	WRN-334	Cortron	1	1	0	200,134	Naphthalene	6,000
16	R-2479	Cortron	2	3	0	181	Xylenes	6,000
17	X-1329	Emulsotron	1	2	0	161	Xylenes	4,000
18	M-45	Flotron	2	3	0	270	Toluene	4,000
19	TSD	Gyptron	2	3	0	2,665	Methanol	4,000
20	M-154	Flotron	2	3	2	216	Toluene	4,000
21	Mixing Tank for WRN-334	Cortron	1	1	0	200,134	Naphthalene	6,000
22	R-2479	Cortron	2	3	0	181	Xylenes	6,000
23	Xylenes	Raw Chemical	2	3	0	17	Xylenes	4,000
24	M-136	Flotron	2	3	0	44	Xylenes	4,000
Bulk Tank Farm - West (to be removed by 2008)								
25	KRN-301W	Cortron	2	3	0	1,315	Methanol	2,500
26	798b05	Emulsotron	2	3	0	276	Xylenes	2,500
27	Empty	--	--	--	--	--	--	2,500
29	KRN-301W	Cortron	2	3	0	1,315	Methanol	2,500

Table 3: Dike Drainage Discharge Form

Hobbs, New Mexico

Fill out a separate form for each sample collected and prior to water release. This is performed to ensure no water is released that has the potential to cause harm to persons, property, and the environment.

Fill out or Circle Each That Apply		
Person Collecting/Examining Sample:		
Discharge Location:		
Date and Time Collected and Examined:		
Rainfall Amount:		
Parameter	Parameter Description	Parameter Characteristics
Color	Is the water colored? **Yes No**	Describe If Necessary:
Clarity	Is the water clear or transparent? Can you see through it? **Yes No**	Which of the following best describes the water clarity? **Clear Milky Opaque**
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? **Yes No**	Which of the following best describes the water sheen? **Oily Silver Iridescent**
Odor	Does the sample have an odor? **Yes No**	Describe If Necessary:
Floating Solids	Is there something floating on the surface of the sample? **Yes No**	Describe If Necessary:
Suspended Solids	Is anything suspended in the sample? **Yes No**	Describe If Necessary:
Settled Solids	Is there something settled at the bottom of the sample? **Yes No**	Describe If Necessary:
Foam	Is there foam or material forming on top of the water **Yes No**	Describe If Necessary:
Detail any concerns or if any corrective actions were taken:		
Collector's Signature and Date:		

Appendix A

CHAMPION TECHNOLOGIES™

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN

HOBBS DISTRICT
HOBBS, NEW MEXICO
DISTRIBUTION FACILITY

Prepared for:

Champion Technologies, Inc.

Suite 2700
3200 Southwest Freeway
Houston, Texas 77027

Prepared by:

Texerra
L. Peter Galusky, Jr. P.E.
Principal Environmental Engineer
505 N. Big Spring, No. 404
Midland, Texas 79701

August 7th, 2006

Executive Summary

- This facility is a bulk distribution center for oil-based chemicals and oils used for down-hole treatment of oil and gas wells in the Permian Basin; (see Figures 1 & 2). Total oil storage on the site is anticipated to be less than 200,000 gallons at any given time; (see Table 1). A schematic diagram of the site layout is given in Figure 4.

- The oil-based chemicals and oils stored in this facility are generally hazardous in nature. Consult Champion's MSDS sheets (maintained in the facility office) and safe product handling procedures (referenced in Appendix B of this document) for critical information necessary for the protection of worker health and safety.

- Key operational components of this SPCC Plan include the following:

    - **Employees are to be trained in the proper and safe handling of the oils and oil-based chemicals handled and stored at this facility.** This training is to occur prior to facility entry for new employees, and on an annual basis for existing employees. Records of this training are to be kept on file at the facility as an amendment to this plan.
    - **Employees are to receive training with respect to this SPCC plan**. This training is to occur prior to facility entry for new employees, and on an annual basis for existing employees. Records of this training are to be kept on file at the facility as an amendment to this plan.
    - Site security is facilitated through access control (fencing and gates) and lighting. These measures are to be inspected on an on-going basis as part of routing work procedures.
    - Facilities and tanks are to be visually inspected on a weekly and annual basis, and records of these inpections kept as an attachment to this plan for a minimum of three years.
    - Tanks of 500 gallons capacity or larger are to be subjected to mechanical and/or material integrity testing by a qualified professional on at least a 10 year frequency. Records of these tests are to be kept as an attachment to this plan from one testing period to the next.
    - Uncontaminated rainwater which has accumulated within secondary containment structures (berms) may be drained from the facilities. Records of these drainage events must be recorded on the form provided in this SPCC plan.
    - **Spills and contaminated rainwater are to be treated with the utmost regard for human health and safety**, following the spill response procedures given in Appendix D.

Schedule of Construction Activities:

During the development of this SPCC Plan, the following area of improvement was identified. As a Best Management Practice (BMP), Champion Technologies has committed to complete the following activity by January 1, 2008.

- Remove from service all tanks containing Champion Products or chemicals within the west bulk tank storage area (shown on Figure 4 as Area B). One or more tanks may remain in service to store non-potable water for use as flush water.

This improvement has the full approval of management with the authority to commit the necessary resources.

Monty Bohannan
Name of Management Representative:

District Manager
Title:

Monty Bohannan
Signature:

8-1-2006
Date:

SPCC Plan Outline

Body of Plan

Appendices

Figures and Tables

Champion Technologies Hobbs Facility – SPCC Plan

I. Purpose and Scope of SPCC Plan

The purpose of an SPCC plan is to protect "navigable waters of the United States" from oil spills per U.S. Environmental Protection Agency rules (40 CFR 112) under the "Clean Water Act". It is generally understood that SPCC regulations apply to "surface" water contamination, where the movement of spilled oil to the receiving body of water is typically rapid. A central feature of SPCC plans is thus to provide sufficient "secondary containment" to contain and to prevent spills from reaching navigable waters before effective response actions can be taken. SPCC regulations are administered by the U.S. Environmental Protection Agency.

In contrast, the spillage of oil and the resulting potential contamination of groundwater is typically a slow process. The protection of groundwater resources is not through SPCC regulations, but is covered under the federal Resource Conservation and Recovery Act (RCRA), and is generally administered by state agencies. An SPCC plan does not address soil and groundwater protection requirements administered by the states.

The scope of an SPCC plan must therefore address the potential for spilled oil to reach navigable (surface) waters of the U.S. Measures intended to protect soils and groundwater are not the subject of SPCC regulations (excepting, perhaps, where the pathway of travel from the surface, through the groundwater to the navigable water is short and the rate of oil movement is rapid). Thus, some flexibility is afforded as to the means of secondary containment specified in an SPCC plan.

II. Facility Description and Operations Summary

This facility is a bulk distribution center for oils and oil-based chemicals (subsequently referred to as "oil" or "oils") used for down-hole treatment of oil and gas wells in the Permian Basin, and is located at 4001 S. Eunice Highway (at milepost 47 on NM 18), in Hobbs, New Mexico (Zip Code 88240; See Figures 1 & 2, below). Champion Technologies' headquarters is located at 3200 Southwest Freeway Suite 2700 Houston, Texas 77027. This facility receives, stores and distributes blended oil-based chemicals for servicing oil and gas wells.

Figure 1 – View of Champion's Hobbs Distribution Facility, looking southwest from NM 18. (Photo taken in April of 2006).

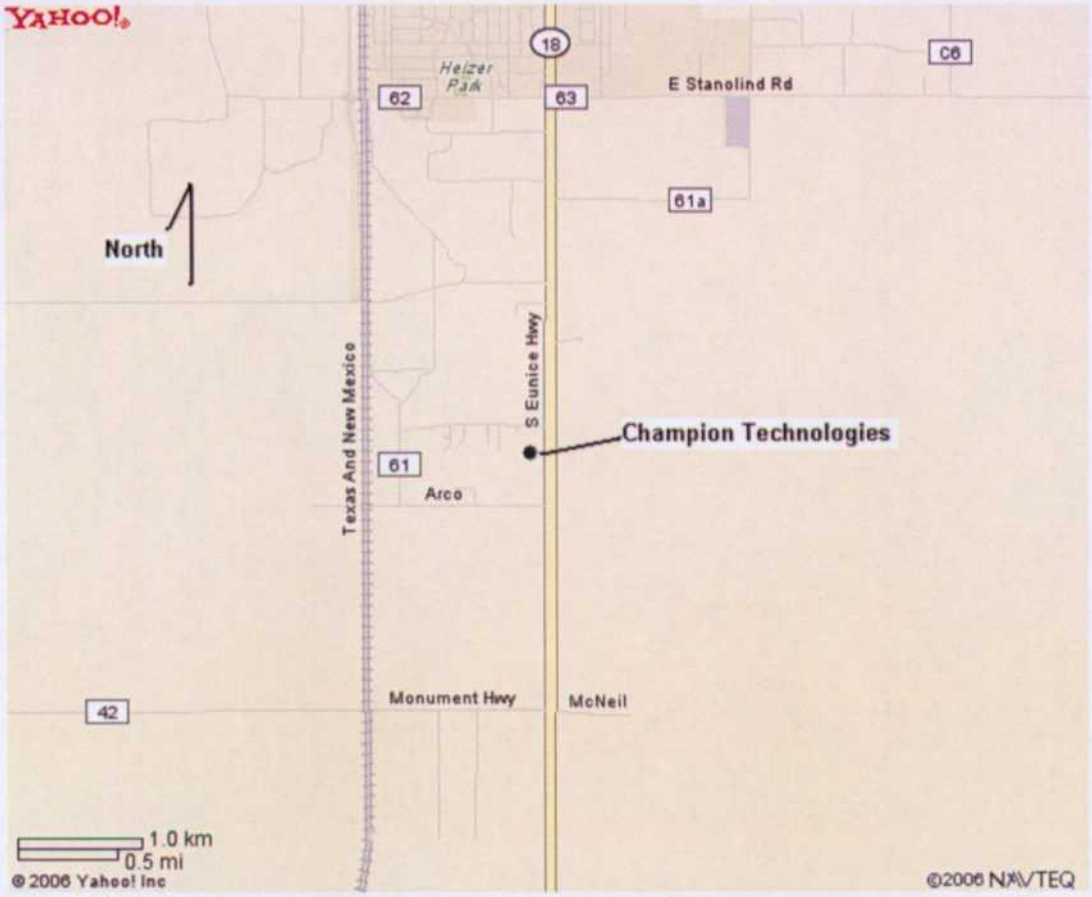


Figure 2 – Location map of Champion's Hobbs Facility

III. SPCC Applicability Determination

Quoting from the regulation,

"Before a facility is subject to the SPCC rule, it must meet three criteria:

1. it must be non-transportation-related;
2. it must have an aggregate aboveground storage capacity greater than 1,320 gallons or a completely buried storage capacity greater than 42,000 gallons; and
3. there must be a reasonable expectation of a discharge into or upon navigable waters of the United States or ad-joining shorelines".

Champion's Hobbs distribution facility meets the first two criteria. However, as this facility is over four (4) miles from the nearest ephemeral drainageway (Monument Draw, which is not itself a navigable water), it almost certainly does not meet the third criterion; (see Figure 3). While there is a small man-made pond used to provide water to cattle is located approximately 40 feet southwest of the facility property line, the facility grounds does not slope towards this pond (slope is to the west) and thus it is unlikely that a release

from the facility would impact the pond. However, Champion has decided to prepare and to implement an SPCC plan at its own discretion, to protect its own and adjacent properties from oil spillage.

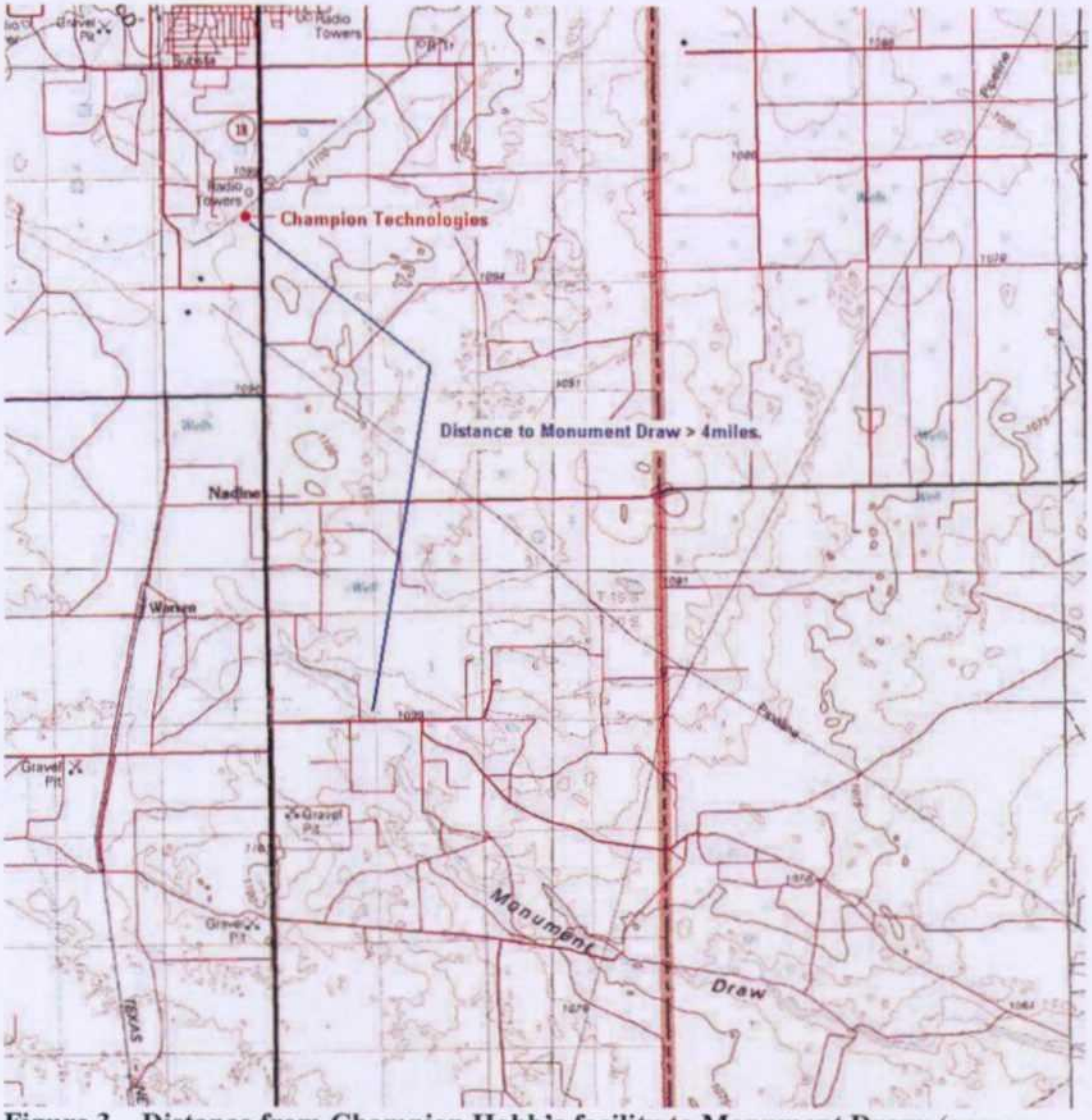
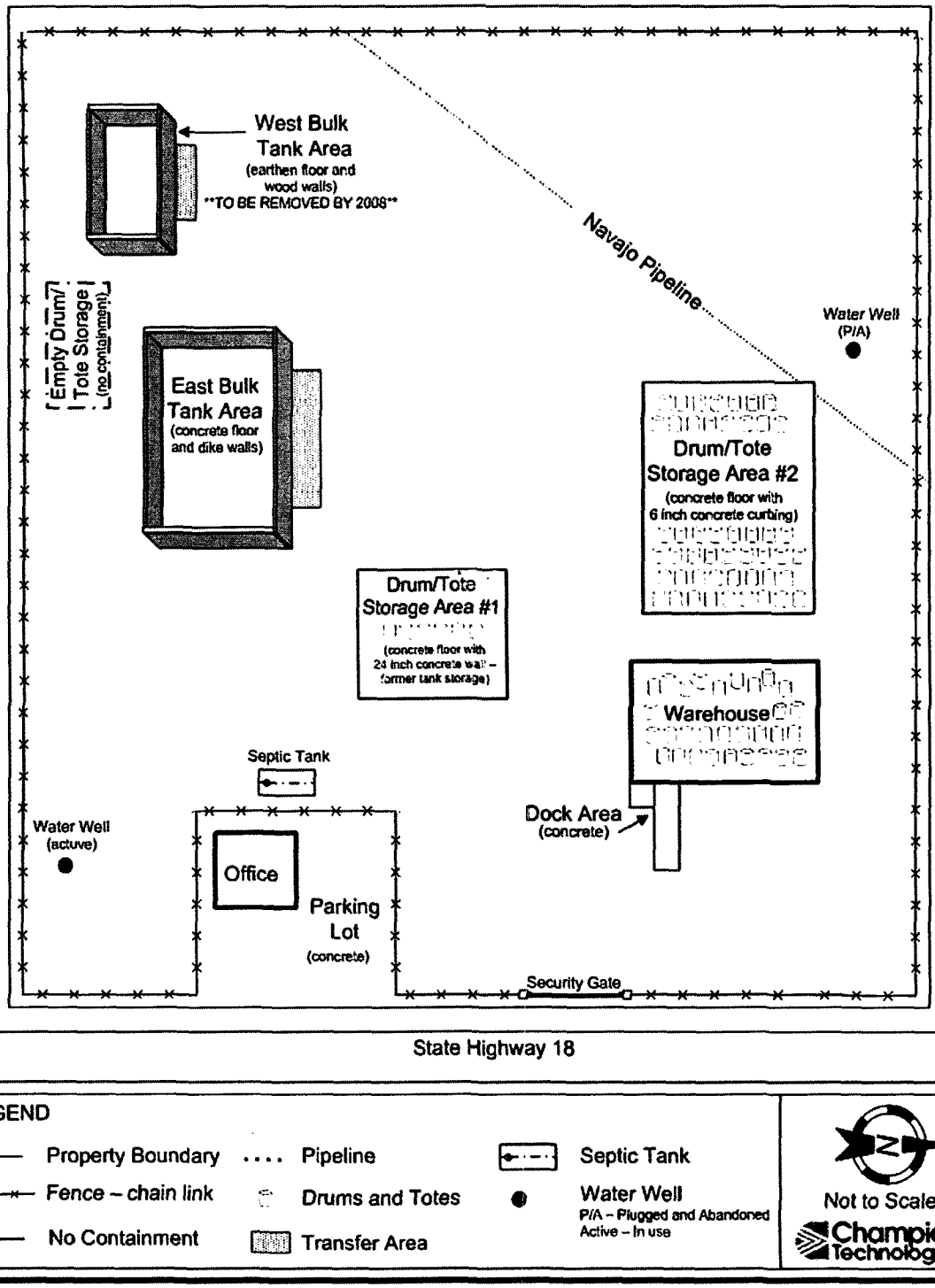


Figure 3 – Distance from Champion Hobb's facility to Monument Draw; (approx. scale: 1 inch = 8,333 ft).

IV. Oil Storage Facilities

A schematic depiction of the facility layout and a summary of oils stored on the facility are given below in Figure 4 and Table 1.

Figure 4 – Site Map
HOBBS, NEW MEXICO



Oil Storage Capacities by Area

Area	Tank Material	Tank Size (gal)	Number of Tanks	Storage (gal)	Notes
East Bulk Storage	fiberglass	6,000	8	48,000	larger tanks
		4,000	16	64,000	smaller tanks
			total	112,000	
West Bulk Storage	plastic & fiberglass	2,500	4	10,000	smaller tanks
Drum Storage #1	plastic	55	200	11,000	estimated max capacity
Drum Storage #2	plastic	55	500	27,500	estimated
Total Facility Oil Storage (gal)				**160,500**	

Table 1 – Summary of oil storage facilities. (Refer to Figure 4 for the relative locations of the respective storage/transfer areas).

V. Potential for Spillage and Secondary Containment

The potential for oil spillage exists in each of the storage and transfer areas noted above. The largest spill likely to occur is that of a complete, instantaneous release of the single, largest container. Secondary containment sufficient to hold such a spill until response activities can be undertaken provides at least 133% of the capacity of the largest container within a designated storage area. This is to allow for the possibility of such a spill occurring during or following a major rainfall event. The dimensions and design of secondary containment structures for each storage/transfer area are summarized below in Table 2. It will be left to the discretion of Champion as to the materials used for secondary containment, which may consist of well constructed and compacted earthen berms, metal or fiberglass, concrete, asphalt or other materials as are compatible with the respective tank contents.

Table 2A– Secondary Containment Summary

Area	Largest Tank Size (gal)	Secondary Containment Required (gal)	**Secondary Containment Provided (gal)**	Berm Length (ft)	Berm Width (ft)	Berm Height (ft)	Gross Containment Capacity (gal)	Capacity Displaced by Tanks	**Net Secondary Containment (gal)**
East Bulk Storage	6,000	7,980	**15,651**	105	60	1.42	66,759	51,108	**15,651**
West Bulk Storage	2,500	3,325	**3,716**	85	20	0.50	6,358	2,642	**3,716**
Drum Storage Area #1	55	73	**>> 1,000**	70	50	0.50	13,090	6,545	**6,545**
Drum Storage Area #2	55	73	**>> 1,000**	149	75	0.50	41,795	20,897	**20,897**

Table 2B - Estimation of Displaced Volumes in Secondary Containment Areas

Area	tank description	tank diameter (ft)	berm height (ft)	no tanks	**displaced volume (gal)**
East Bulk Storage Area	large tanks	8	1.42	8	17,036
	small tanks	8	1.42	16	34,072
				tank area total	51,108
West Bulk Storage Area	small tanks	7.5	0.50	4	2,642
Drum Storage Area #1	drum storage	Displaced volume visually estimated at 50% of containment capacity			6545
Drum Storage Area #2	drum storage	Displaced volume visually estimated at 50% of containment capacity			20,897

VI. Prevention Measures

Security

Site Access Control

The perimeter of the Facility is completely fenced, and access is controlled by a locking gate through the main entrance on NM 18. The gate is open and unlocked only when Champion personnel are present on the facility.

Facility Lighting

The Facility is in operation under normal business hours and therefore the Facility must be equipped with adequate outdoor lighting to allow for the discovery of discharges occurring during hours of darkness, both by operating personnel and by non-operating personnel (general public). The outdoor lighting that illuminates the facility at night will prevent and deters acts of vandalism. The facility will provide adequate lighting in all areas where oil is stored, loaded, or unloaded. The lighting must be adequate to detect spills at night. Flashlights will be made available for response actions and inspections in dimly lit storage areas as supplemental the outdoor lighting.

Responsible Product Transfer and Handling Procedures

Proper oil handling and transfer procedures are described in Appendix B.

Facility and Tank Inspection

It is the Company's intention to train all oil handling personnel such that they will be conscious of the conditions that could cause spills. This awareness will allow personnel to identify and rectify those conditions during the course of their day-to-day operations. Any visual leaks identified should be repaired promptly and/or reported to their area supervisor and any oil accumulation removed.

Inspection of all storage tanks and material storage areas, piping, valves and appurtenances, and related equipment will be conducted by Facility personnel to detect any leaks, cracks or deterioration of equipment that could cause a spill. The following inspection procedures shall be instituted at the specified frequency.

Weekly

The facility conducts weekly inspections to confirm the SPCC Plan is being properly implemented and maintained. These inspections cover all applicable oil product tanks and associated piping connections for evidence of leakage and deterioration. The inspection procedures include:

(1) an inspection of all secondary containment structures for the presence of water or oil;

(2) a visual inspection of tank exteriors for leaking, damage and/or corrosion; and
(3) an inspection of the tank supports/foundations for signs of deterioration.

In addition, the inspections will verify that spill control equipment is available at the facility. The weekly SPCC plan inspection checklist is provided in Appendix D. The weekly inspection records will be maintained on site for a minimum of three (3) years.

Annually

Inspection of Valves, Piping, and Appurtenances

Regular visual inspections of valves, piping, and appurtenances will be performed by the Facility on an annual basis (once every 12 months). Records of these inspections must be kept with the Plan for a minimum of three years. This inspection should include a review and assessment of the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking valves, and metal surfaces.

The facility does not contain underground piping carrying oil or liquids subject to the SPCC rules and therefore integrity and leak testing of buried piping is not applicable to this Facility.

Periodic Tank Integrity Inspection

Large Tanks (500 gallons or greater). The facility will conduct tank integrity testing consistent with good engineering practice, as developed in the American Petroleum Institute Standard 653 or a similar, industry-accepted standard. This standard combines visual inspections (i.e., the weekly inspection procedure noted above) with hydrostatic and/or non-destructive tank material analysis. Champion will conduct such testing by a qualified tank-integrity professional. In addition to the above schedule, any tanks that undergo material repairs to its shell or containment wall/floor will be integrity tested prior to bringing them back into service.

Small Tanks (Less than 500 gallons). Tanks smaller than 500 gallon capacity will be subjected to weekly and annual visual inspection.

Drainage of Uncontaminated Rainwater

Secondary containment structures at the facility are designed to prevent the uncontrolled release of oil into the environment in the event of a container failure, system component failure or human error. Uncontaminated accumulated rainwater can be drained from the containment structures. In order to minimize the risk of discharging pollutants, these structures must be drained according to the following procedures:

- The decision to discharge uncontaminated rainwater from secondary containment areas must be made by a qualified company professional, who will visually inspect the water for sheen, film or other sign that pollutants are present. When the inspection indicates that the accumulated water has not been visually impacted, the discharge of the rainwater will be allowed to be discharged.

- If a sheen or another indicator (olfactory) of contamination is observed during the initial inspection, the rainwater will be collected and properly disposed of.

- All discharges from diked areas and secondary containment structures will be documented using the form given in Appendix F. Copies of these records must be kept for a minimum period of three years.

Any visually evident leaks or discharges from facilities which result in a minor (drips and drabs, not gallons) loss of oil will be promptly repaired and corrected. Any incidental accumulations of spilled or contaminated water will be collected and disposed of properly.

Spill Response

It is to be emphasized that the first priority in any spill response effort must be on personnel safety. The response, reporting and clean-up procedures to be followed following the discovery of an oil spill are given in Appendix D. A critical element of every spill response is to follow a Job Safety Analysis (JSA), developed in consultation with Champion's HSE Department.

Waste Disposal

The disposal of all recovered material, contaminated soil, used absorbent materials, and other spill materials will be coordinated by qualified Champion personnel (designated as the "Spill Coordinator") according to New Mexico regulations. If Facility personnel contained the spill, immediate contact with the area supervisor must be made so that proper and timely disposal can occur. After spill response is complete, all spill equipment that cannot be reused and which has been contaminated will be managed for proper disposal.

Clean-up materials will be removed from temporary staging areas within a timely manner following cleanup completion, to be managed with the Facility's normal waste disposal activities. The Facility will use a licensed waste transporter and disposal facility for all generated wastes. The Spill Coordinator must ensure that the waste is labeled, transported, and disposed of properly. All waste generated during the clean up of any spill will be removed from the Facility and disposed of as soon as possible. All waste should be disposed off-site at a Facility approved by the appropriate federal or state agency to accept the waste.

VII. Training and Recordkeeping

Personnel Training

Champion Technologies SPCC Training will consist of a classroom presentation and "on the job" training will be used to train all Champion Technologies facility representatives (upon initial hire) who handle oil products at the facility. This training will cover the following topics as required under 40 CFR 112.7(f):

- Overview of general facility operations
- **Safe procedures for handling oil products**
- Operation and maintenance of equipment used to prevent oil discharges
- Procedures and requirements for reporting an oil discharge
- Overview of applicable pollution control laws, rules, and regulations
- Review of the content of the SPCC Plan for the facility

In addition, Champion Technologies representatives who handle oil products at the facility will receive oil discharge prevention briefings annually (or more frequently if a spill or discharge occurs) that describe any oil discharges, and any equipment failures or malfunctions that led or could have led to an oil spill or discharge. These oil discharge prevention briefings will also include an overview of any recent prevention or control measures that have been implemented.

Recordkeeping

All record associated with the SPCC Plan must be kept and made available for at least 3 years. Records should be maintained within the same binder the Plan is kept.

VIII. Management Approval

This Spill Prevention, Control and Countermeasure (SPCC) Plan has the full approval of management with the authority to commit the necessary resources. The programs and procedures outlined in this Plan will be implemented and periodically reviewed and updated in accordance with 40 CFR Part 112, as amended, and with applicable state and local requirements.

Monty Bohannon
Name of Management Representative:

District Manager
Title:

Monty Bohannon
Signature:

8-1-2006
Date:

IX. SPCC Plan Review and Amendment

A complete review and evaluation of the SPCC Plan will be conducted at least every five (5) years in accordance with 40 CFR 112.5

All technical amendments to the SPCC Plan must be reviewed and certified by a professional engineer (PE). The management signatory, above, agrees not to implement any technical amendments to this Plan without the review and certification of a professional engineer, as may be noted in a technical amendment to the Plan.

Any amendments to the SPCC Plan will be implemented as soon as possible, but no later than six (6) months after preparation of the - amendment.

X. Professional Engineer Certification

In accordance with 40 CFR 112.3(d), I hereby certify that:

I am familiar with the provisions of 40 CFR Part 112 – Oil Pollution Prevention;
I, or my agent, have visited and examined the facility described herein;

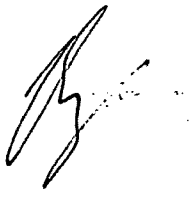
This SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of 40 CFR Part 112;

Procedures for required inspections and testing have been established; and

This SPCC Plan is adequate for the facility:

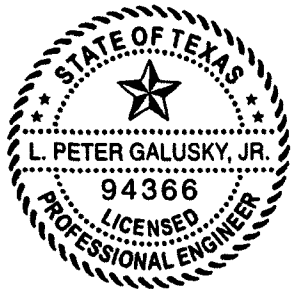
Champion Technologies @ 4001 S. Eunice Highway Hobbs, New Mexico 88240.

Name/Title: L. Peter Galusky, Jr., P.E. / Principal Environmental Engineer
Company: **Texerra**
Signature:



Certification Date: August 7th, 2006

PE Registration Number: 94366
PE Registration State: Texas
PE Engineering Seal



APPENDIX A – Certification of the Applicability of the Substantial Harm Criteria

Facility Name: **Champion Technologies**

Facility Address: 4001 S. Eunice Highway Hobbs, New Mexico 88240

1) Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallon?

No

2) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

No

3) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

No

4) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

No

5) Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

No

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information I believe that the submitted information is true, accurate, and complete.

Signature

Title: Principal Environmental Engineer

Name: **L. Peter Galusky, Jr. P.E.**

Date: **August 7th, 2006**

Appendix B: Transfer and Product Handling Procedures

Champion Technologies *Committed to Improvement*	Tier 3 – Hobbs, New Mexico SITE SPECIFIC GLOBAL QHSE PROCEDURE
TITLE: LOADING / UNLOADING TANKER TRUCKS	
Global Document Effective Date: 01-Mar-2005	**Tier 3 Document Effective Date: Aug. 2006**
Global Author: C. LeBlanc	**Tier 3 Author: J. Hamilton and S. Schweigert**

1.0 PURPOSE

1.1 To provide a standard procedure for filling fixed bulk storage tanks from tanker trucks.

1.2 To provide the PPE required when filling fixed bulk tanks from tanker trucks.

1.3 To provide the job hazards and the recommended actions to eliminate or minimize the hazards when filling fixed bulk storage tanks.

2.0 SCOPE

2.1 Product loading and unloading of tanker trucks at a Champion Technologies facility.

3.0 RESPONSIBILITY

- Location managers are responsible for procedure implementation.
- All location managers are responsible for ensuring that their employees follow this procedure as applicable.

4.0 PROCEDURE

4.1 Tanker truck arrives with chemical.

4.2 Facility employee reviews and receives the driver's bill of lading. Verify product storage availability to ensure an overfilling condition does not exist.

4.3 Review MSDS of each chemical before the filling process commences.

4.4 Ground tanker before transfer commences. Follow the Champion Bonding and Grounding Procedure.

4.5 Ensure all hoses and pumps are in good working condition. Hook up hose from the truck to the pump and then from pump to the appropriate bulk storage header valve. Ensure the tanker vent valve is open.

Champion Technologies

Committed to Improvement

Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: LOADING / UNLOADING TANKER TRUCKS

4.6 Open the header and bulk tank valve.

4.7 Open the tanker truck valve and turn on the pump. Look for any leaks on connections or hoses. Stay within arm's length of the pump and shut down if leaks exist.

4.8 Monitor volume availability of the storage tank while pumping to ensure overfilling does not occur.

4.9 Upon completion, close tanker truck valve and break the hose connection at the tanker.

4.10 Allow pump to run to remove residual product from the hoses.

4.11 Turn the pump off. Close header valve. Close bulk storage tank valve. Break down, cap and secure hoses.

4.12 Ensure the tanker vent valve is shut.

4.13 Release the truck.

5.0 SAFETY

PERSONAL PROTECTIVE EQUIPMENT

PPE	When Required
Safety Glasses	To be used when impact from flying objects or debris is expected.
Chemical Goggles	Chemical goggles are required to be worn when chemical splashes may be anticipated.
Hard Hat	Should meet Class E (formerly Class B) requirements, which meet impact and low voltage requirements. To be worn in the warehouse, yard, on the forklift, and customer locations.
Gloves	o Non-slip chemical resistant o Chemically resistant (Includes nitrile, butyl, or other gloves compatible with the chemicals used.)
Hard-toed Shoes	o Steel-toed or o Safety Cap

Champion Technologies

Committed to Improvement

Tier 3 - Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: LOADING / UNLOADING TANKER TRUCKS

6.0 HAZARDS

JOB HAZARD/A.O.C.	ELIMNINATING/MINIMIZING THE HAZARD
Chemical vapors/splashes	o Work upwind and keep head away. o Wear respirator when required. o Keep bungs closed when possible. o Wear chemical goggles and chemical resistant gloves.
Hose rupture or disconnect	o Inspect hoses before use. o Ensure hose connections are secure before pumping. o Wear proper PPE.
Tank Overfilling	o Ensure product space availability before pumping. o Monitor volume continuously while filling.
Broken Glass	o Wear chemical goggles and chemical resistant gloves.

Champion Technologies *Committed to Improvement*	Tier 3 – Hobbs, New Mexico SITE SPECIFIC GLOBAL QHSE PROCEDURE
TITLE: DRUM AND TOTE TANK FILLING OPS	
Global Document Effective Date: 01-Mar-2005	**Tier 3 Document Effective Date: Aug. 2006**
Global Author: C. LeBlanc	**Tier 3 Author: J. Hamilton and S. Schweigert**

1.0 PURPOSE

The purpose of this procedure is to provide written instructions to properly and safely operate equipment when packaging materials and to prevent pollution to the environment.

2.0 SCOPE

The scope of this procedure is limited to the following Champion Technologies on-site operations:

- Produet drum, tote tank and pail filling

3.0 RESPONSIBILITY

3.1 Location managers are responsible for procedure implementation.

3.2 All location managers are responsible for ensuring that their employees follow this procedure as applicable.

4.0 REQUIRED EQUIPMENT

- Empty tote tanks, drums, or pails
- Pump
- Hose
- Grounding Wire
- Filling gauge

Champion Technologies

Committed to Improvement

Tier 3 - Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: DRUM AND TOTE TANK FILLING OPS

5.0 SAFETY

PERSONAL PROTECTIVE EQUIPMENT

PPE	COMMENTS
Safety Glasses	Used as a minimum for eye protection.
Chemical Goggles	Chemical goggles are required to be worn when chemical splashes may be anticipated.
Hard Hat	Should meet Class E (formerly Class B) requirements, which meet impact and low voltage requirements. To be worn in the warehouse, yard, on the forklift, and customer locations.
Gloves	o Non-slip chemical resistant o Chemically resistant (Includes nitrile, butyl, or other gloves compatible with the chemicals used.)
Hard-toed Shoes	o Steel-toed or o Safety Cap
Respiratory Protection	Wear air purifying respirator with acid gas, organic vapor, or other appropriate cartridges when PEL is exceeded, contaminants are below IDLH levels, and breathing air is between 19.5% and 23.5%.

6.0 HAZARDS

JOB HAZARD	*ELIMINATING / MINIMIZING THE HAZARD*
Chemical vapors	o Work upwind and keep head away. o Wear respirator when required. o Keep bungs closed when possible.
Hose rupture or disconnect	Inspect hoses before use. Ensure hose connections are secure before pumping. Wear proper PPE.

Champion Technologies

Committed to Improvement

Tier 3 – Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: DRUM AND TOTE TANK FILLING OPS

7.0 PROCEDURE

7.1 A work order is generated

7.2 Select an empty pail, drum or tote tank that meets all D.O.T. requirements.

7.3 Perform a visual inspection of each pail, drum or tote tank. Inspect externally for cracks, warping, corrosion, dents, leaks, other structural damage, and chemical residue around all threaded connections. NOTE: Tote tanks that do not pass the visual inspection are to be placed out of service, triple rinsed, fixed if required, and retested using the Champion Portable Tank Testing Procedure.

7.4 Review MSDS of each chemical before the filling process commences.

7.5 Remove all old labels and replace with new labels corresponding to the material in the work order.

7.6 Set up pump and hoses and ensure they are in good working condition.

7.7 DEEPWATER ONLY: All Deep Water (DW) products must be filtered while filling.

7.8 Connect hose to the manifold and to the pump and ensure camlock security pin is inserted to prevent connection failure.

7.9 Connect hose to the drum filling stinger and ensure the stinger reaches the bottom.

7.10 Open the valve at the manifold system.

7.11 Ensure no residual pressure is in the lines by slowing turning the stinger valve ¼ open.

7.12 Turn the pump on and slowly open the stinger valve to the full open position.

7.13 Monitor the filling gauge to ensure no overflow of the drum or tote tank.

7.14 When the drum or tote tank is full, turn the stringer valve to the closed position.

7.15 The stinger is removed slowly from the drum to allow for drainage of excess chemical.

7.16 The stinger is placed into the next drum or tote tank and the valve is slowly turned to the fully open position and the filling process is repeated.

Champion Technologies

Committed to Improvement

Tier 3 – Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: DRUM AND TOTE TANK FILLING OPS

7.17 After all tanks / drums are filled close the manifold valve to allow displacement of the pumps and hoses.

7.18 The pump is switched into the "OFF" position

7.19 The discharge hose is disconnected from the discharge outlet of the pump, and held high enough to ensure chemical is not spilled.

7.20 Disconnect the hose at the manifold and ensure the ends of the hose are locked together to prevent any spills from occurring.

7.21 Disconnect the hose from the discharge of the pump to the stinger and ensure the ends are held up to prevent chemical spill.

7.22 Pull the stinger out and allow excess to drain into the drum or tote tank.

7.23 The stinger is swiped clean and stored properly.

7.24 Ensure all hoses are properly stored to prevent chemical pollution.

7.25 Seal the drum or tote tank and ensure the proper label is on the container.

7.26 Place in inventory or stage from delivery.

Champion Technologies *Committed to Improvement*	Tier 3 – Hobbs, New Mexico SITE SPECIFIC GLOBAL QHSE PROCEDURE
TITLE: FILLING TREATER TRUCKS	
Global Document Effective Date: 24-Apr-2005	**Tier 3 Document Effective Date: Aug. 2006**
Global Author: C. LeBlanc	**Tier 3 Author: J. Hamilton and S. Schweigert**

1.0 PURPOSE

The purpose of this procedure is to provide written instructions to properly and safely fill treater trucks at the facility and to prevent pollution to the environment.

2.0 SCOPE

The scope of this procedure is limited to the following Champion Technologies on-site operations:

- Filling treater trucks from drums, totes, or fixed tanks

3.0 RESPONSIBILITY

3.1 Location managers are responsible for procedure implementation.

3.2 All location managers are responsible for ensuring that their employees follow this procedure as applicable.

4.0 REQUIRED EQUIPMENT

- Tote, drum, or fixed tank
- Pump
- Hose
- Grounding Wire
- Treater Truck

Champion Technologies

Committed to Improvement

Tier 3 – Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: FILLING TREATER TRUCKS

5.0 SAFETY

The following is a list of minimum Personal Protective Equipment (PPE) required for this operation:

PPE	COMMENTS
Safety Glasses	Used as a minimum for eye protection.
Chemical Goggles	Chemical goggles are required to be worn when chemical splashes may be anticipated.
Hard Hat	Should meet Class E (formerly Class B) requirements, which meet impact and low voltage requirements. To be worn in the warehouse, yard, on the forklift, and customer locations.
Gloves	o Non-slip (Cotton or leather) o Chemically resistant (Includes nitrile, butyl, or other gloves compatible with the chemicals used.)
Hard-toed Shoes	o Steel-toed or o Safety Cap
Respiratory Protection	Wear air purifying respirator with acid gas, organic vapor, or other appropriate cartridges when PEL is exceeded, contaminants are below IDLH levels, and breathing air is between 19.5% and 23.5%.

6.0 HAZARDS

JOB HAZARD	ELIMINATING / MINIMIZING THE HAZARD
Chemical vapors	o Work upwind and keep head away. o Wear respirator when required. o Keep bungs closed when possible.
Hose rupture or disconnect	o Inspect hoses before use. o Ensure hose connections are secure before pumping. o Wear proper PPE.
Strains from lifting/moving drums	o Avoid twisting when lifting or moving empty drums. o Do not throw drums. o Use legs as much as possible. o Use mechanical assistance-forklift, manual drum lifters.

Champion Technologies

Committed to Improvement

Tier 3 – Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: FILLING TREATER TRUCKS

6.0 PROCEDURE- FILLING FROM DRUMS AND TOTES

6.1 A work order is generated. Fill out JSA and/or other appropriate safety and environmental paperwork.

6.2 Put on appropriate PPE.

6.3 Perform pre-trip inspection on truck.

6.4 Drive the treater truck to the appropriate loading area. Apply the parking brake.

6.5 Locate and position the drum or tote products for loading.

6.6 Review MSDS of each chemical before the filling process commences.

6.7 Insert stinger into drum or tote.

6.8 Open load line valve and appropriate chemical tank valve.

6.9 Disengage truck clutch, put P.T.O. in load position, and engage clutch. Product will flow from the drum or tote to the chemical tank. Visually watch sight glass to ensure overfilling does not occur.

6.10 When chemical tanks on truck are full, disengage clutch.

6.11 Pull the stinger out and allow excess to drain into the drum or tote tank.

6.12 The stinger is swiped clean and stored properly.

6.13 Shut tank valve and load line valve.

6.14 Disengage P.T.O.

6.15 Seal all bungs and lids on drums and totes used. Place empty drums on their sides with their bungs horizontal to the ground to prevent spills and leaks.

6.16 Generate bill of lading corresponding to the products loaded on the truck. Ensure correct placards are placed on the truck in reference to the D.O.T. hazard class and identification number on the bill of lading prior to departure.

Champion Technologies

Committed to Improvement

Tier 3 – Hobbs, New Mexico

SITE SPECIFIC GLOBAL QHSE PROCEDURE

TITLE: FILLING TREATER TRUCKS

7.0 PROCEDURE- FILLING FIXED BULK TANKS

7.1 A work order is generated. Fill out JSA and/or other appropriate safety and environmental paperwork.

7.2 Put on appropriate PPE.

7.3 Perform pre-trip inspection on truck.

7.4 Drive the treater truck to the appropriate loading area. Apply the parking brake.

7.5 Review MSDS of each chemical before the filling process commences.

7.6 Using the 2-inch hose, connect the hose to the appropriate valve at the fixed tank header system. Ensure the appropriate chemical has been selected.

7.7 Connect the opposite end of the hose to the load line connection on the truck.

7.8 Place an open-top bucket under the truck connection to ensure leaks are captured.

7.9 Open the header valve, load line valve, and appropriate chemical tank valve.

7.10 Disengage truck clutch, put P.T.O. in load position, and engage clutch. Product will flow from the fixed tank to the truck chemical tank. Visually watch sight glass to ensure overfilling does not occur.

7.11 When chemical tank(s) on truck are within about 5 gallons of being full, shut off valve at the header to prevent overfilling.

7.12 If available, open the T-connection at the header to allow air in to suck remaining fluid from the hose into the truck.

7.13 Disengage truck pump.

7.14 Close load line valve and chemical tank valve.

7.15 Disengage hose keeping the hose ends up and cap the hose ends together.

7.16 Hang or place hose in out-of-the way location.

7.17 Generate bill of lading corresponding to the products loaded on the truck. Ensure correct placards are placed on the truck in reference to the D.O.T. hazard class and identification number on the bill of lading prior to departure.

Appendix C: Weekly and Annual Inspection Checklists

This appendix includes copies of the weekly and annual inspection checklists that are to be performed by a qualified individual. The weekly inspection record must be completed except for the week in which an annual inspection is performed. During the inspection if any item receives "yes" as an answer, it must be described and addressed immediately.

CHAMPION TECHNOLOGIES
REGULATORY/COMPLIANCE WEEKLY INSPECTION REPORT

FACILITY:_____ DATE:_____

OFFICE AREA	YES	NO	N/A
1. CLEAN AND ORDERLY			
2. AISLES OPEN AND CLEAR			
3. EMERGENCY TELEPHONE NUMBERS POSTED			
4. FIRE EXTINGUISHER MOUNTED AND CHARGED			
5. EXIT SIGNS POSTED			
6. EMERGENCY LIGHTING TESTED AND WORKING PROPERLY			
7. FEDERAL 5-IN-1 POSTER IN CENTRAL LOCATION			
REMARKS:			
LABORATORY AREA	YES	NO	N/A
1. CLEAN AND ORDERLY			
2. NO SMOKING SIGNS POSTED			
3. FIRE EXTINGUISHERS MOUNTED AND CHARGED			
4. FIRST AID KIT			
5. EYEWASH/SAFETY SHOWERS ACCESSIBLE, TESTED & WORKING PROPERLY			
6. ALL CONTAINERS PROPERLY LABELED AND CLOSED			
REMARKS:			
WAREHOUSE AREA	YES	NO	N/A
1. CLEAN AND ORDERLY			
2. DRUMS NEATLY STACKED/STORED			
3. FREE FROM LEAKS AND SPILLS			
4. NO SMOKING SIGNS POSTED			
5. FIRE EXTINGUISHERS MOUNTED AND CHARGED			
6. FIRST AID KIT			
7. ABSORBENT MATERIAL TO CONTAIN LEAKS OR SPILLS			
8. EYEWASH/SAFETY SHOWERS ACCESSIBLE, TESTED & WORKING PROPERLY			
9. ALL CONTAINERS PROPERLY LABELED AND CLOSED			
10. ALL PORTABLE AND FIXED LADDERS STRUCTURALLY SOUND			
REMARKS:			
BLEND AREA	YES	NO	N/A
1. LINES AND VALVES FREE FROM LEAKS			
2. ELECTRICAL EQUIPMENT CHECKED FOR HAZARDS			
3. WIRING IN GOOD CONDITION			
4. FLOOR/WORK AREA CLEAN			
5. NO SMOKING SIGNS POSTED			
6. FIRE EXTINGUISHER MOUNTED AND CHARGED			
7. ALL CONTAINERS PROPERLY LABELED AND CLOSED			
REMARKS:			
FUEL TANK AREA	YES	NO	N/A
1. FREE FROM SPILLS OR LEAKS			
2. ELECTRICAL HOOKUP PROPERLY GROUNDED			
REMARKS:			

BULK STORAGE TANKS (ABOVEGROUND STORAGE TANKS)	YES	NO	N/A
1. TANK SURFACES SHOW NO SIGN OF LEAKAGE (IE. STAINS, RUST, ETC.)			
2. CONNECTIONS, PIPINGS, AND VALVES FREE FROM LEAKS (NO SIGNS OF STAINS ON CONCRETE BENEATH CONNECTIONS, PIPING, AND VALVES)			
3. BOLTS, RIVETS, AND SEAMS ARE IN GOOD CONDITION			
4. MANIFOLDS FREE FROM LEAKS			
4. SUMP(S) ADEQUATELY PUMPED DOWN			
5. TANK HATCHES CLOSED AND SECURE			
6. TANKS PROPERLY GROUNDED			
7. TANKS PROPERLY LABELED			
8. EYEWASH/SAFETY SHOWER ACCESSIBLE, TESTED & WORKING PROPERLY			
9. TANK LEVEL GAUGES OR ALARMS ARE OPERATIVE			
10. VENTS ON TANKS ARE CLEAR			
11. NO WATER/PRODUCT IN INTERSTICE OF DOUBLE-WALLED TANK			
SECONDARY CONTAINMENT – ABOVEGROUND STORAGE TANKS	YES	NO	N/A
1. NO STORMWATER, PRODUCT, OR OTHER LIQUID STANDING WITHIN SECONDARY CONTAINMENT			
2. DIKE CONTAINMENT AREA FREE FROM DRUMS, CONTAINERS, OR OTHER MATERIALS			
3. DIKE DRAINAGE VALVE IS CLOSED AND LOCKED			
4. NO NEW STAINS OR CRACKS (WIDTH GREATER THAN VERTICAL DIME) VISIBLE ON SECONDARY CONTAINMENT WALLS AND FLOORS			
SECONDARY CONTAINMENT – DRUM AND TOTE STORAGE AREA	YES	NO	N/A
1. NO STORMWATER, PRODUCT, OR OTHER LIQUID STANDING WITHIN SECONDARY CONTAINMENT			
2. DIKE CONTAINMENT AREA FREE FROM DRUMS, CONTAINERS, OR OTHER MATERIALS			
3. DIKE DRAINAGE VALVE IS CLOSED AND LOCKED			
4. SECONDARY CONTAINMENT WALLS AND FLOORS ARE IN GOOD CONDITION – NO NEW STAINS OR CRACKS (WIDTH GREATER THAN VERTICAL DIME) IN WALL OR FLOOR VISISBLE.			
REMARKS:			
LOADING/UNLOADING AREA – MANIFOLD SYSTEM	YES	NO	N/A
1. LOADING/UNLOADING MANIFOLD IS IN GOOD CONDITION (NO VISIBLE DAMAGE OR DETERIORATION)			
2. ALL CONNECTIONS ARE CAPPED OR BLANK-FLANGED			
3. NO STANDING PRODUCT/LIQUID IN SPILL TROUGH			
REMARKS:			
YARD AREA	YES	NO	N/A
1. FENCE AND GATE SECURE			
2. FREE FROM SPILLS OR LEAKS			
3. DRUM STORAGE AREA ORDERLY			
4. DRUM STORAGE AREA FREE FROM LEAKS			
5. DRUMS AND CONTAINERS PROPERLY LABELED AND CLOSED			
REMARKS:			

EMPTY DRUM STORAGE AREA	YES	NO	N/A
1. FREE FROM SPILLS OR LEAKS			
2. STACKED IN ORDERLY MANNER			
3. BUNGS INSTALLED ON ALL DRUMS			
4. BUNGS ARE SEALED			
REMARKS:			
WASTE MANAGEMENT	YES	NO	N/A
1. HAZARDOUS WASTE CONTAINERS LABELED AND CLOSED			
2. HAZARDOUS WASTE IN CONTAINMENT			
3. NON-HAZARDOUS WASTE IN CONTAINMENT			
4. ARE WASTE DRUMS SEALED			
5. SHOW NUMBER OF HAZARDOUS WASTE CONTAINERS			
6. SHOW NUMBER OF NON- HAZARDOUS WASTE CONTAINERS			
7. AREA FREE OF OLD BATTERIES, ENGINE OIL, AND OIL FILTERS			
REMARKS:			
SECURITY	YES	NO	N/A
1. ALL PROPERTY & EQUIPMENT KEPT IN WAREHOUSE/FENCED LOCATIONS			
2. WAREHOUSES/FENCES EQUIPPED WITH A LOCKING DOOR OR GATE			
3. VEHICLES LOCKED DURING STORAGE			
4. KEYS TO VEHICLES PLACED IN A CONTROLLED ACCESS LOCATION			
5. FENCE/ WAREHOUSE ADEQUATE TO MINIMIZE UNAUTHORIZED ACCESS			
6. FACILITY GATES AND DOORS CLOSED AND LOCKED WHEN NO PERSONNEL ARE AT THE FACILITY			
REMARKS:			

INSPECTED BY:_____ SIC CODE: 5169

NUMBER OF PERSONNEL AT FACILITY:_____ MANAGER'S INITIALS:_____

This inspection record must be completed *each year.* If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. **Any item that receives "yes" as an answer must be described and addressed immediately. Actions taken and date performed must be attached to this Checklist.**

TANK AREA –
(Copy form as necessary to complete for each tank containment area)

	Y	N	NA	Comments
Concrete floor and dike				
Secondary containment is stained				
Dike drainage valve is open or is not locked				
Dike walls or floors are cracked or are separating				
Dike does not retain water following large rainfall				
Dike drainage valve is open or not locked				
Piping – aboveground				
Valve seals or gaskets are leaking				
Pipelines or supports are damaged/deteriorated				
Joints, valves & other appurtenances are leaking				
Buried piping is exposed				
Out-of-service pipes are not capped				

Sketch Tank Area: identify any yes responses:

Tanks
For each tank within containment, complete the following (attach copies of sheet if more than 6 tanks in containment)

Tank #	Y	N	NA	**Tank #**	Y	N	NA	**Tank #**	Y	N	NA
Tank surfaces show signs of leakage				*Tank surfaces show signs of leakage*				*Tank surfaces show signs of leakage*			
Tanks are damaged, rusted or deteriorated				*Tanks are damaged, rusted or deteriorated*				*Tanks are damaged, rusted or deteriorated*			
Bolts, rivets, or seams are damaged				*Bolts, rivets, or seams are damaged*				*Bolts, rivets, or seams are damaged*			
Tank supports are deteriorated or buckled				*Tank supports are deteriorated or buckled*				*Tank supports are deteriorated or buckled*			
Tank foundations have eroded or settled				*Tank foundations have eroded or settled*				*Tank foundations have eroded or settled*			
Overflow gauges or alarms are inoperative				*Overflow gauges or alarms are inoperative*				*Overflow gauges or alarms are inoperative*			
Vents are obstructed				*Vents are obstructed*				*Vents are obstructed*			
Comments:				Comments:				Comments:			
Tank #	Y	N	NA	**Tank #**	Y	N	NA	**Tank #**	Y	N	NA
Tank surfaces show signs of leakage				*Tank surfaces show signs of leakage*				*Tank surfaces show signs of leakage*			
Tanks are damaged, rusted or deteriorated				*Tanks are damaged, rusted or deteriorated*				*Tanks are damaged, rusted or deteriorated*			
Bolts, rivets, or seams are damaged				*Bolts, rivets, or seams are damaged*				*Bolts, rivets, or seams are damaged*			
Tank supports are deteriorated or buckled				*Tank supports are deteriorated or buckled*				*Tank supports are deteriorated or buckled*			
Tank foundations have eroded or settled				*Tank foundations have eroded or settled*				*Tank foundations have eroded or settled*			
Overflow gauges or alarms are inoperative				*Overflow gauges or alarms are inoperative*				*Overflow gauges or alarms are inoperative*			
Vents are obstructed				*Vents are obstructed*				*Vents are obstructed*			
Comments:				Comments:				Comments:			

LOADING/UNLOADING AREAS					
	Y	N	NA	Comments	Sketch Loading/Unloading Area: identify any yes responses:
Manifold					
Manifold is damaged or deteriorated					
Connections are not capped or blank-flanged					
Loading area drainage valve is open					
Catch buckets not kept closed or have residue on outside of bucket					
Containment (speed bumps/berms, floors, curbing, etc.)					
Dike walls or floors are cracked or are separating					
Curbed/contained area does not retain water following large rainfall					
Floor is stained					
SECURITY					
Fencing, gates, or lighting is non-functional					
Pumps and valves not in use are not locked					
RESPONSE EQUIPMENT					
Response equipment inventory is incomplete					

Signature: _____ **Date:** _____ **Manager's Signature:** _____ **Date:** _____

Following items were identified during annual inspection. Describe action taken to remedy identified item and date performed.

Identified Issue:	Action Taken to Remedy	Signature	Date Performed

APPENDIX D – Spill Response, Clean-up and Reporting Procedures

Incidental Spill Response, Cleanup and Reporting

In the event of an incidental (minor) spill, the distribution center representative will contact the facility Manager and Champion's HSE department regarding the spill. Prior to initiating a cleanup, a Job Safety Analysis (JSA) is to be developed which takes into account the nature of the spilled fluids, making reference to the respective MSDS sheet(s). The JSA may provide guidance which is in addition to, or supercedes, the general response procedures summarized below.

The Champion Technologies representative will use the spill cleanup equipment (see below – must be available on site) to properly clean up and dispose of the spill residue. The standard spill response equipment (i.e., spill kit) at the distribution center will include:

- Oil absorbent material (socks, booms, granular absorbent, etc.)
- Large plastic bags
- Broom
- Spark-free shovel
- Dustpan

Minor/Incidental Spills (<=55 gallons)

- Prevent the source of the spill from continuing to discharge oil if possible (e.g., place the container upright, stop the pump).
- Apply the absorbent material in a sufficient amount to absorb the oil. If the spill occurs in an area where the floor/ground is sloped, then place temporary drain covers over the floor drains and catch basins in the area, if applicable. Apply the absorbent in front of the leading edge of the spill; covering the entire spill area. If appropriate for the spill scenario, prevent the oil from reaching the storm water catch basin by applying additional absorbent around (not in) the catch basin.
- Place the oil/absorbent residue in a plastic bag within a plastic bag (i.e., double bagged). Use a broom and dustpan to thoroughly clean the area where the spill occurred.
- Properly dispose of the oil/absorbent residue consistent with federal, state and/or local requirements.
- The facility Manager will inspect the location of the spill to ensure the clean up was performed correctly and that no recoverable residue remains.

Large Spills (> 55 gallons)

In the event of a spill that is beyond the ability of the Champion Technologies facility employees and available equipment to properly handle, the local Champion will contact their emergency responders, and make reports to the respective federal and/or state agencies as listed in Appendix E.

Appendix E- Emergency and Agency Contact Numbers

Hobbs Fire Department

For emergencies, call 911.
For non-emergencies, call 505 397-9308.

Champion Technologies Contact and Phone Numbers

Name, Title	Office Number	Mobile Number
Monty Bohanan, Facility Manager	505-393-7726	432-631-5492
Mabry Thomas, Regional Mgr	432-683-4217	432-413-7982
James Hamilton, Regional HSE Mgr	432-563-0142	432-425-9021
Richard Campbell, Regional Ops Mgr	432-563-0142	432-556-1252
Stan Moore, Regional Tech Mgr	432-563-0142	432-528-0680

New Mexico Department of the Environment

Must report if:

Any amount of any material in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or may unreasonably interfere with the public welfare or the use of property. This includes chemical, biohazardous, petroleum-product, and sewage spills and incidents. In addition to recent spills, the discovery of evidence of previous unauthorized discharges, such as contaminated soil or ground water, also must be reported.

Judgment is involved here. Contact James Hamilton (number given above), for guidance.

Verbal notification must be provided as soon as possible after learning of a discharge, but in no event more than twenty-four (24) hours thereafter.

For emergencies, call 505-827-9329 twenty-four hours a day.

For non-emergencies, call 866-428-6535 (voice mail, twenty-four hours a day).

For non-emergencies, call 505-428-2500 (staff member during normal business hours,.

U.S. Environmental Protection Agency

If any quantity of spilled materials reaches or is likely to reach Monument Draw, call EPA to report this and to ask for guidance.

USEPA Region VI	(214) 665-6489 (call this number)
National Response Center	(800) 424-8802 (provided for reference)

APPENDIX F – Record of Drainage of Non-Contaminated Water from Secondary Containment

Dike Drainage Discharge Form

Hobbs, New Mexico

Fill out a separate form for each sample collected and prior to water release. This is performed to ensure no water is released that has the potential to cause harm to persons, property, and the environment.

Fill out or Circle Each That Apply		
Person Collecting/Examining Sample:		
Discharge Location:		
Date and Time Collected and Examined:		
Rainfall Amount:		
Parameter	Parameter Description	Parameter Characteristics
Color	Is the water colored? **Yes No**	Describe If Necessary:
Clarity	Is the water clear or transparent? Can you see through it? **Yes No**	Which of the following best describes the water clarity? **Clear Milky Opaque**
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? **Yes No**	Which of the following best describes the water sheen? **Oily Shiny Iridescent**
Odor	Does the sample have an odor? **Yes No**	Describe If Necessary:
Floating Solids	Is there something floating on the surface of the sample? **Yes No**	Describe If Necessary:
Suspended Solids	Is anything suspended in the sample? **Yes No**	Describe If Necessary:
Settled Solids	Is there something settled at the bottom of the sample? **Yes No**	Describe If Necessary:
Foam	Is there foam or material forming on top of the water **Yes No**	Describe If Necessary:
Detail any concerns or if any corrective actions were taken:		
Collector's Signature and Date:		

APPENDIX G – Regulatory Cross-Reference Table

SPCC Rule	Description of Section	Plan Section
112.7	Management Approval	VIII
112.5	SPCC Plan Review and Amendment	IX
112.3(d)	Engineer Certification	X
112.7	General Requirements	I
112.7(a)(1) and (a)(2)	Conformance with Applicable Requirements; Deviations from Plan Requirements – Equivalent Environmental Protection	N/A
112.7(a)(3)	Facility Description and Site Layout	IV
112.7(a)(3)(i)	Type of Oil and Storage Capacity	IV
112.7(a)(3)(ii)	Discharge Prevention Measures	VI
112.7(a)(3)(iii)	Discharge Drainage Controls as Secondary Containment	VI
112.7(a)(3)(iv)	Countermeasures for Discharge Discovery, Response, and Cleanup	VI
112.7(a)(3)(v)	Methods of Disposal of Recovered Materials	VI
112.7(a)(3)(vi)	Contact List and Phone Numbers	App. E
112.7(a)(4)	Discharge Reporting Information	App. E
112.7(a)(5)	Organization of Response Procedures	App. D
112.7(b)	Potential Spill Prediction Information	V
112.7(c)	Containment and Diversion Structures or Equipment	V
112.7 (d)	Oil Spill Contingency Plan	N/A
112.7(e)	Inspections, Integrity Testing and Recordkeeping Practices	VI, VII
112.7(f)	Personnel Training, and Discharge Prevention Procedures	VII, VI
112.7(g)	Security	VI

SPCC Rule	Description of Section	Plan Section
112.7(h)	Facility Tank Car and Truck Loading/Unloading	IV, App. B
112.7(i)	Field-constructed Aboveground Container Repair	NA
112.7(j)	Applicable State Rules and Regulations	App. E.
112.8(a)	General Requirements	VI
112.8(b)(1)	Drainage from Diked Storage Areas	VI., App. F
112.8(b)(2)	Valves to Control Drainage in Diked Storage Areas	VI
112.8(b)(3)	Drainage from Undiked Areas	VI, App. D
112.8(b)(4)	Discharge from Ditches	NA
112.8(b)(5)	Drainage from Treatment Systems	NA
112.8(c)(1)	Bulk Storage Container Material of Construction	IV
112.8(c)(2)	Bulk Storage Container Secondary Containment	V
112.8(c)(3)	Bulk Storage Container Area Drainage	VI, App. F
112.8(c)(4)	Completely Buried Metallic Tank Cathodic Protection	NA
112.8(c)(5)	Partially Buried Metallic Tank Cathodic Protection	NA
112.8(c)(6)	Integrity Test Aboveground Containers	VI
112.8(c)(7)	Leak Control of Heating Coils	NA
112.8(c) (8)	Discharge Prevention Devices	VI
112.8(c)(9)	Inspection of Effluent Treatment Systems	NA
112.8(c)(10)	Visible Discharges/Accumulation of Oil	VI, App. F
112.8(c)(11)	Mobile or Portable Storage Containers	IV
112.8 (d) (1)	Transfer System Buried Piping	NA
112.8(d)(2)	Transfer System Terminal Connection	NA
112.8(d)(3)	Transfer System Pipe Supports	NA
112.8(d)(4)	Transfer System Inspection of Aboveground Piping	VI, App. F

SPCC Rule	Description of Section	Plan Section
112.8(d)(5)	Transfer System Security	VI, App. F
112.12(a)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – General Requirements	NA
112.12(b)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Facility Drainage	NA
112.12(c)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Bulk Storage Containers	NA
112.12 (d)	SPCC Requirements for Animal Fats and Oils and Greases, and Vegetable Oils – Facility Transfer Operations, Pumping, and Facility	NA
112.20	Facility Response Plans – General Requirements	NA
112.20(e)	Facility Response Plans – Certification of the Applicability of the Substantial Harm Criteria	App. A