GW - 212

INSPECTIONS & DATA

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

1034.04

HP 6200
Rec: 7/5/95
App: 8/24/95
EXP: 8/24/05

DATE: 10-12-00 Time: 4:00 pm

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

Discharge Plan: No ☐ Yes ☑ DP# GW-212

FACILITY NAME: BALLARD C.S.

PHYSICAL LOCATION: _____

Legal: QTR SE QTR NE Sec 26 TS 26N R 9W County SAN JUAN

OWNER/OPERATOR (NAME) EPFS

Contact Person: DAVID BAYS Tele:# [redacted] 599-2256

MAILING
ADDRESS: 614 REILLY AV. FARMINGTON State NM ZIP 87401

Owner/Operator Rep's: _____

OCD INSPECTORS: DENNY FOUST AND ED MARTIN

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

EMPTY DRUMS STORED UPRIGHT IN METHANOL/UNLEADED GASOLINE CONTAINMENT AREA.

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

OIL LEAKS FROM COMPRESSOR NOT BEING CONTAINED. FLOWING ONTO GROUND.

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

OK

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

OK

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

OK

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

N/A

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

N/A

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

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

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

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

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

SEE ITEM #2

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

OK

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

No

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

No

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

Miscellaneous Comments:

Number of Photos taken at this site: 0

BALLARD

GW-212

Same as the rest.

Leaks from skids onto ground

EMPTY DRUMS STORED IMPROPERLY IN METHANOL/LNL GAS STORAGE AREA.

NMOCD INSPECTION REPORT

SITE: El Paso Natural Gas (EPNG) Ballard Plant

INSPECTED BY: Bill Olson and Ed Martin

INSPECTION DATE: January 28, 2003, 10:00 am – 11:00 am

COMPANY REPS. David Bays, EPNG

ALLEGATIONS:
"While it is no longer operating...EPNG buried mercury-filled meters and barrels of oil field waste near the Kutz Wash..." (EarthJustice Legal Defense Fund 1/6/03 Petition to EPA)."

INSPECTION FINDINGS:
This site is not located near the Kutz Wash. It is located on open range land on the mesa approximately several hundred feet above and approximately 1 mile laterally from the ephemeral Blanco Wash. Blanco Wash does eventually drain into the San Juan River approximately 15 miles north of the site.

This plant is still operating although the original Ballard Plant was demolished and a new one was erected in its place. There is a small building on site that is currently being used as an office. According to EPNG during the mercury meter remediation project meter tubes were cleaned of mercury in above-ground drain troughs and the mercury was sent to Bechtel Corp. in New York for recycling. The cleaned meters were sold for scrap. According to EPNG personnel, no mercury or meters were buried on site. Some construction waste from the demolition of the old plant was buried on site legally and EPNG stated that they have the documentation for this on-site disposal.

The photograph in the petition shows the surface area east of the wastewater tanks where tires were dumped on the surface. The tires had been removed at the time of inspection. There is evidence of an old release just to the east of this area. The above-ground tank showed evidence of an overflow at some time in the past. In this area, one can see small amounts of highly weathered hydrocarbon staining in the soil. This area contains approximately 4 feet of soil and is underlain by approximately 50 feet of sandstone which outcrops just east of the hydrocarbon staining.

RECOMMENDATIONS
None at this time. This facility is currently permitted under discharge permit GW-212.

EPNG Ballard Plant area, looking North. This is the area where the old tires were located in the Earthjustice photograph.

EPNG Ballard Plant area. View of office building previously used for mercury recovery from meter tubes.

EPNG Ballard Plant area, looking East. In the distance is the Blanco Wash.

EPNG Ballard Plant area. View of office building previously used for mercury recovery from meter tubes.