GW - 228

WORK PLANS

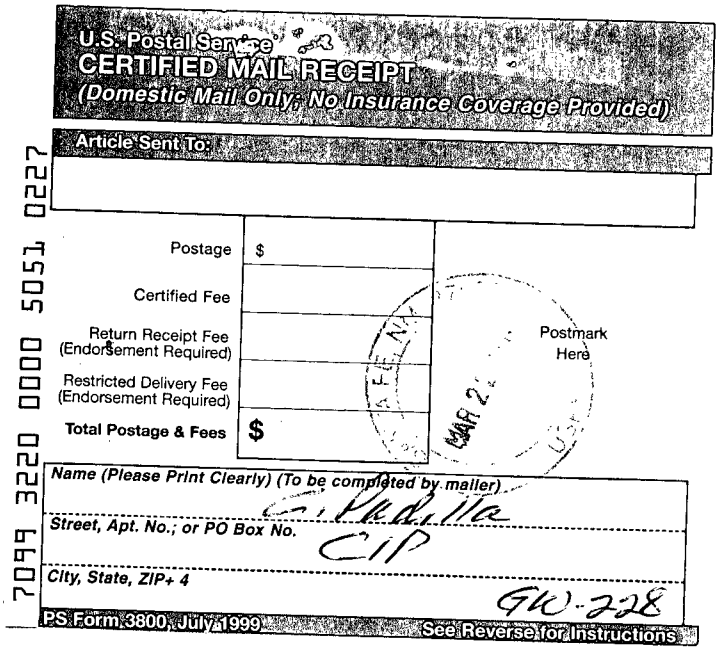
NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

March 22, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0227



Mr. Carl Padilla
CIP Inc.
#51 CR 5570
Farmington, New Mexico 87401

RE: Discharge Plan GW-228
Workplan
CIP Inc., Farmingon facility
San Juan County, New Mexico

Dear Mr. Padilla:

The NMOCD has received the CIP Inc. workplan submitted by your consultant Envirotech, Inc. for remedial work of the Farmington facility located in S1/2 SE/4, Section 10, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico.

After a review of the workplan and based on the data and site investigation report submitted by the NMED at the Farmington facility (GW-228) **the work plan is approved with the proposed schedule for work to be completed.**

Note, that OCD approval does not relieve CIP Inc. of responsibility for compliance with any other Federal, State, or other local laws and/or regulations. The terms and conditions of the discharge plan approved May, 9, 1996 must be adhered to until the renewal of this discharge plan is approved.

Sincerely,

W. Jack Ford, C.P.G.
OCD Environmental Bureau

xc: Mr. Denny Foust-OCD Aztec District Office

CARL PADILLA — Pres.
BARBARA PADILLA — Sec./Treas.

REMANUFACTURER & SERVICE OF OILFIELD EQUIPMENT
GENERAL & MECHANICAL CONTRACTORS
NMLIC. # 033501
CIP .INC.
505-632-0977
FARMINGTON, NM

#51 Road 5570
Farmington, NM 87401
505/632-0977
FAX / 632-9120

March 20, 2001

RECEIVED
MAR 21 2001
Environmental Bureau
Oil Conservation Division

O.C.D.
Attention: Mr. Jack Ford

CIP Inc. has engaged the services of Envirotech Inc. in assisting, supervising and providing proper direction. Please review the attached revised (as per Debbie Brinkerhoff) documents and advise.

Sincerely,

Carl Padilla

Carl Padilla

ENVIROTECH INC.
PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 20, 2001

CIP Inc.
Attn: Carl Padilla
#51 Road 5570
Farmington, New Mexico 87401

505-632-0977
Fax 505-632-9120

Re: Schedule for CIP yard cleanup

Dear Carl:

We recommend a staged or scheduled cleanup of various waste streams at CIP's yard located on County Road 5570. It is important that the cleanup be conducted in an orderly manner so that all of the issues detailed by the NMED HWB are addressed. We recommend a site map be prepared before work starts that identifies areas on the site that require attention (ie. paint cans, drums with different kinds of materials, damaged empty drums, soil staining related to spills, and leaks, and soil staining related to equipment cleaning). Once the scope of work has been reduced to paper we recommend that sufficient manpower be dedicated to completing the work in an orderly fashion. One or two laborers, one operator and a backhoe will be needed when soil issues are being addressed. When barrels, drums and paint cans are being addressed, the backhoe (for handling) and two additional laborers will be needed to sort and stage various containerized wastes.

Work on the project can initiated immediately upon approval by the NMED HMB. The following schedule is recommended:

1) At least one day to prepare a plat // site sketch of work areas.
2) Using the backhoe and laborers, gather misc. spills and stains from the yard area to two (2) staging areas; 1) exempt - spills near tanks and production equipment and 2) non-exempt - spills from unknown sources.
3) Allow one-to-two days to excavate the larger stained areas near the wash rack. This material should be staged separate from the "exempt oilfield waste". A composite sample from the stockpile will be analyzed for "Total" RCRA 8 Metals. Once the results are received paperwork for remediation of hydrocarbon components can be submitted to the NMOCD (7-10 days for approval).
4) We will need to check petroleum hydrocarbon scale and sludge at the pile in the center of the yard for NORMs contamination. Submit paperwork (Certificate of Waste Status, Lab results for Metals, NORMs screening results, and a list of equipment serviced to generate the material) for remediation of this material to the NMOCD for approval (7-10 days).
5) Based on the site inventory, sort and over pack empty, partial, and full paint cans for disposal. The paint will be sorted by hazard class (flammable liquid, flammable solid, non-hazardous liquid, etc.).
6) When materials have been properly packaged obtain a quote for disposal from an EPA permitted Treatment, Storage, and Disposal Facility (TSDF). Make arrangements for disposal. (Allow two weeks)

7) Sort drums by type of material. Sample as needed for each type of waste. Used oil may be picked up by Mesa Recycling or Safety Kleen. The drivers for these companies typically check the products for water content and chlorinated solvents before they accept the oil for recycling.
8) Drums containing oily debris will have to have filters, cans and other refuse removed. Soil will be placed with either the exempt or non-exempt piles for analysis and remediation. (Note oilfield related garbage generated as a result of this cleanup will need to go to Montezuma County Landfill near Cortez, Colorado because current New Mexico state laws prohibit debris from oilfield production and service companies from going to regular solid waste companies.)
9) Damaged drums and paint "skulls" (empty cans) will be crushed and sent to a local recycler.
10) When profiling is complete for each waste stream, ship materials to appropriate facilities for disposal, recycling, or remediation.

With a crew of 3-4 men supported by a backhoe we estimate cleanup to take approximately 4-10 days. The crew demands will vary depending on the tasks scheduled for each day. Completion of the work, including disposal of the waste streams generated, will require approximately 21-28 days.

If you have further questions or comments regarding this work plan or if we can be of service implementing this work please feel free to contact us at 505-632-0615.

Sincerely,

Envirotech Inc.

Harlan M Brown
Geologist / Hydrogeologist
New Mexico Certified Scientist #083

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 20, 2001

CIP Inc.
Attn: Carl Padilla
#51 Road 5570
Farmington, New Mexico 87401

505-632-0977
Fax 505-632-9120

Re: Revised - Workplan for mitigation of miscellaneous spills and leaks at the CIP yard

Dear Carl:

Envirotech Inc. is pleased to provide a proposal to mitigation spills and leaks at the CIP yard located on County Road 5570. "Housekeeping" appears to be the major issue with regard a recent citizen complaint filed with the New Mexico Environment Department's Hazardous Materials Bureau. We strongly recommend that this work plan be approved by the bureau before work begins. We also recommend that a representative of the bureau be invited to observe cleanup activities and be allowed the opportunity to sign off on completed work. We also recommend that the NMOCD be invited to observe the cleanup since the site has a discharge plan under their jurisdiction. The following is a summary of actions that should be completed to address issues identified by NMED HMB inspectors.

1) For purposes of an initial cleanup all surface oil stains, misc. paraffin leaks, and stained soil need to be excavated and placed with your sludge pile at the center of the yard. The soil pile will then need to screened for Naturally Occurring Radioactive Materials (NORMs). (NMED HMB has already sampled several stained areas for BTEX and RCRA 8 Metals). With completion of appropriate paperwork this soil can then be sent to Envirotech or Tierra for remediation.

   We recommend that removal of stains be documented by a third party. Cleanup to visual standards is typical. RCRA 8 Metals and USEPA 8021 (BTEX) analyses have already been conducted at most of the stained areas. Documentation of the spill cleanup could be an environmental consultant or the NMOCD field inspector. Documentation by an independent party will lend credibility to your cleanup program.

   Soil staining in the vicinity of the sumps is the result of overflows from the washing facilities. Sludges derived from washing the internal components of oilfield production equipment are exempt by definition. External oils and sludges are may not be exempt especially if they involve lube oils. We recommend that TCLP metals be run on this soil before it is commingled with other on-site soils. To verify that oily soil has been removed the NMOCD normally accepts USEPA 8015 as a closure sampling method. We recommend that a five point composite sample be collected from each of the large spill cleanup areas.

   The large pile of oily waste at the center of the yard is reported to be oily material removed from production equipment including production equipment such as storage tanks, dehydrators, and separators. For purposes of profiling, the waste is exempt by USEPA definition as long as hazardous materials have not been mixed with the pile (paint wastes or used motor oils for example). The material will have to be screened for NORMs prior to landfarming. Note that this

material is likely to exceed Maximum Allowable Concentrations for Benzene due to the presence of "live oil" and condensate associated with natural gas and crude oil production.

2) Drums, five gallon cans, one gallon cans, and other unlabeled containers of various sizes will need attention. The contents will need to be identified for proper disposal. We recommend that a complete inventory be conducted for two reasons. First, product that is useable will be identified for use by CIP personnel. Second, waste materials will be identified by type /source for disposal. It is critical during this process that products not be mixed or commingled. (If "hazardous"paint waste gets mixed in with otherwise exempt or non-hazardous materials the whole mix becomes hazardous, by EPA definition.) When this phase of the project is complete there should be no container on CIP property without a label or properly stored as an empty vessel.

We anticipate that inventory and profiling various sizes of containers will generate the following general categories of waste; 1) flammable liquids, 2) flammable solids, 3) oily oilfield waste from unknown sources (requiring a minimum of RCRA RCI and RCRA Metals analysis) and 4) used oil products. It may be that other characteristic materials will be found during the inventory and profile process.

We strongly recommend that CIP eliminate as many drums as possible. We recommend that any drums with holes, dents, damaged rings, or that are otherwise in poor condition be crushed and sent to a local vendor for recycling. Recognizing that CIP frequently uses drums for a variety of tasks, we recommend that good empties be properly cleaned and stored. Drums should have functional lids (to prevent rain water from getting inside) and should be sealed and stored on their sides so that they are not in contact with the ground. When a drum is placed in service for storing **any** material it should have a watertight lid properly secured between uses. When a drum is placed in service it should be labeled with a paint pen. The label should identify the date that accumulation of the contents began and the product or waste stream. If the material is hazardous waste such as xylene contaminated paint bottoms the drums should have a hazardous label identifying the contents.

3) When the inventory has been completed similar products will be bulked for profiling. It is critical at this stage of the project that hazardous and non-hazardous materials be carefully segregated. Analysis should be conducted as necessary to characterize the waste streams for disposal. Oil products may be recycled, oil contaminated soil in drums may go to Envirotech or Tierra for remediation, and paint related wastes will need to shipped to an EPA permitted facility for disposal.

Note that manifests / records should be kept for every waste stream leaving the facility.

4) We recommend that a report be prepared to document the whole process. The report should include photographs taken before, during, and after the cleanup. Bills of Lading or manifests should be included to document the disposition of all materials leaving the site (including a receipt for recycled steel from empty buckets and drums).

Envirotech recommends that CIP develop a Standard Operations Procedure for receiving oilfield and natural gas production equipment, cleaning and handling waste generated during the refurbishing process, disposal of the waste stream, and documentation of used equipment handled at CIP's facility. The following are some guidelines that are currently in use by other contractors providing similar services as that provided by CIP.

1) Request that NORMs analysis be conducted in the field for each piece of equipment received and that a NORMs certificate be provided for the unit. Not all operators have the capability to conduct NORMs Surveys and the interior of some vessels are not accessible for screening. It may be necessary to have someone on your staff become certified to calibrate and operate a survey instrument.

2) Document all information related to the origin of each unit received including; Unit Serial Number, Block Number, Section, Township, Range, County, well name, and operator.

3) Units that have been NORMs surveyed should be labeled with a parts paint pen, weather proof tag, or label to indicate results, who, when, and where the NORMs survey was conducted.

4) As units are reconditioned solids, sludges and other debris will be developed as the units are dismantled. All water and sludge should be contained on a "wash- pad" or similar area to prevent run-off from the cleaning area. Water can be recycled for washing purposes and other deleterious materials such as oils, glycols, amines, scale, and other waste associated with the refurbishing operations separated and containerized for disposal. This waste is typically "Exempt Oilfield" waste and can be disposed of at an NMOCD approved facility. To obtain NMOCD approval for the disposal event you will need an NMOCD Certificate of Waste Status, records of where the waste material came from (attach a list that includes data developed when the equipment was received), and a NORMs Survey.

We have the following general recommendations intended to improve "Housekeeping" issues that tend attract unwanted attention.

1) Encourage all personnel to dispose of rubbish (lunch bags, pop cans, empty paint cans, and other trash) in trash cans. Trash cans should be placed for convenient access and regularly emptied. Stress that rubbish and trash are not to be mixed into hazardous or oilfield waste streams.

2) Empty paint cans should be allowed to dry prior to disposal. Empty cans be recycled or sent to Waste Management for disposal. Lids should be left off. Empty is defined as "all wastes (product) removed that can be removed using practices commonly employed to remove materials from that type of container" *40 CFR 261.7(b)(1)(i)*.

3) When any product (oil, paint, soapy water) is removed from its original container for use at a work station one of the following should occur:

   a) If the smaller vessel is to remain in service at the work station it should have a lid in place when not in use and be clearly labeled.

b) If the material is for a short term or occasional use, unused product should be returned to the original container and the temporary container placed upside down on a tray or rack to allow residual product to gather in a drip container.

4) Spills and leaks in the yard and around the shop should treated immediately.

5) Oily waste should never be placed on the ground (unless it is at a predetermined secure lined holding area pending appropriate disposal).

6) Cleaning activities should be well away from the natural wash that crosses the property to prevent any contamination to soil in the wash that would be impacted by storm water.

7) Sort through the drums currently on-site. Keep drums that are in good condition. Empty drums that are kept on-site should be stored on their sides with lids and bungs in place. (Oily soil should never be stored in an open top drum without a lid. Rain water will accumulate under a layer of water and eventually float the oil out of the drum and contaminate soil around the drum.) Recycle or dispose of damaged drums or drums without lids.

8) Drums that are in use should be stored with lids in place and on a surface that allows the bottoms to stay dry (on pallets, on slats when on concrete, or under roof).

9) Paint and xylene products should be used completely when possible. If paint waste is developed such as xylene bottoms, or unuseable paint they should be disposed of through an EPA permitted hazardous materials Treatment, Storage, and Disposal Facility (TSDF).

10) Inventory every product held on CIP's property. If the product is something that is in good condition and you use it, put it where it will be used appropriately. If you find unknown products, products that are not serviceable, or are no longer used in you operation make arrangements for their proper disposal.

If you have further questions or comments regarding this work plan or if we can be of service implementing this work please feel free to contact us at 505-632-0615.

Sincerely,

Envirotech Inc.

Harlan M Brown
Geologist / Hydrogeologist
New Mexico Certified Scientist #083

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

Inspection Report

Facility: CIP, Inc. Location: 51 Road 5570
Carl I. Padilla Farmington, NM 87401

EPA ID #: — Mailing Address: Same
Ownership: Carl Padilla
Authorized Agent: _____ Facility Contact: Carl Padilla

Time of Entry 10:30 Date 2/15/01 Access: Granted / Denied _____
Facility Representative Carl Padilla Title _____
Reason(s) for Denial of Access (if applicable) _____

Carl Padilla
Facility Representative Signature

Debby Bruinsma
Inspectors Signature

Entry Conference:

Present Credentials to Facility Representative	✓
Cite Statutory Authority to Enter Site (HWA § 74-4-4.3)	✓
Cite Statutory Authority to Conduct Inspection, Obtain Samples and Take Photographs (HWA § 74-4-4.3) .	✓
Specify Reason for, and Nature of the Inspection	✓
Specify Objectives and Procedures for Inspection	✓
Schedule Exit Conference	✓

Participants:

Name	Signature	Title	Phone #
Carl Padilla	Carl Padilla	President	505-632-0977
Robert Atencio	Robert Atencio	Senior Spec D	505-827-1558 X1060
Ron Trujillo	Ron Trujillo	RCRA INSPECTOR	505-827-1558
Brian Salem	Brian Salem	" "	827-1557 x1010
Debby Bruinsma	Debby Bruinsma	Prg Mgr.	827-1558 ext 1007

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID —
Facility Name CIP, Inc.
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI no
Facility was Last Inspected on: —
Citizen Complaint yes
Observation by Inspector SB, RT, BS, BA,
Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business: Using 25 to 28 acres
60-70 employees - operating at this location
6 years.
5631 Highway 64 - next to Four Corners Drilling
was previous address.
Manufacturing & remanufacturing of oil field equipment, separators, dehydrators tanks. Service equipment out in the field
5 Big Trucks - 10 pickups
General contracting and plumbing.

Waste Streams Generated:

Waste Code	Description of Process	Location
?	Welding Shop - soak open equipment in paint thinner, soap, gasoline. Pressure testing equipment - antifreeze put kitty litter to dumpster	Welding Shop
?	unknowns - green hard plastic 5-1 gal.	
?	- Antifreeze container - w oil - says antifreeze - hydraulic oil	
	2 sheds next to Welder Op. - Parts	
?	2 - 55 gal drums - 1 full, 1/4 - 1 full	
?	1 - paint thinner (1/4) open	
?	1 - antifreeze/coolant	
?	5 gal container by East gate - oil sludge open	
	5 fire extinguishers on sides next to welding shops	
?	West of Welding shops - Sump	Sump tank
?	pump out by the quarter	
?	1/2 55 gal drum - water/oil sweepings sludge. → dumpster	
?	SW Corner outside weld shop 3-5gal buckets - unknowns.	
	On [illegible] - where	4-5 gal

This Compliance Evaluation Inspection was Conducted Based on: CIP 2-15-01

FY 01 Grant Requirements — Citizen Complaint yes

Follow up to Previous CEI no Observation by Inspector DB, BS, RT, BK

Facility was Last Inspected on: —.

Checklists Completed: CESQG, SQG, < 90 Day, Transporter, LDR, Tanks, and Containers.

History and Nature of Business: _____

Waste Streams Generated:

Waste Code	Description and Process	Location of Management
	5 gals antifreeze open bucket next to power wash unit, 2-55 gal drums antifreeze 1 open Oily dirt - spilled out to powerwasher South of weld shop - rusted oily dirt pile South of Weld shop 4-55gal drums - 1 open 1 - ethylene glycol - clear open 55 gall drum	Weld Shop
BTEX F005 F003 D018	SW corner - dirt work + into the arroyo. Don Trucking, Sinco Oil Field Service Co. Only facility that will take non exempt - picarilla	- sample
	1-55 gallons - oily dirt w/ welding rods - west of sump tank - takes to Sierra - Sump tank - very oily dirt Welding Pad west of Weld shop - very stained soil	- sample west of sump up on hill west of welding shops
Xylene F003 D001 (Naptha) (Stoddard)	Paint area - N of W. Shop reuse paint / thinner into spray operation.	10-15 gallons / week paint used 1-5 gal 1-5 gal xylene / week

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID _____
Facility Name CIP, Inc
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI —
Facility was Last Inspected on: —

Citizen Complaint yes
Observation by Inspector DB, BS, BA, RT

Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business: _____

Waste Streams Generated:

Waste Code	Description of Process	Location
	1- open 5 gal green paint w/ skin on top drying → to landfill	N. of weld shop
	Parts building North of Paint area — hydraulic fluid on ground	
	Crude ~~used~~ Oil Tank - oil from pipe of equipment - taken back to producer	West of Parts Bldg, Grind & Weld
	Tank bottoms - Open on top 4-5 gal buckets full of oil	—
BTEX D018 F005 F003	Paint storage shed - open containers for paint brushers	South of Parts Bldg Grind & Weld
	Open thinner - 5 gals	SE of parts bldg
	Grind & Weld shops - cuttings to Scrap recycler, N - parts building - 2-5 gal containers open oily sludge	
—	2 - open tanks - 500 gals each	directly north of paint area
—	oily - open	" " "
—	square open tank - oily dirt at bottom of tank → Sierra Landfarm	
—	2 - Remanufactured tanks - 100 barrel had a little oil & sludge 110 barrel	

8 - 5 gal

(4.)

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID —
Facility Name CIP, Inc.
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI —
Facility was Last Inspected on: —

Citizen Complaint yes
Observation by Inspector SB BA BS RT

Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business:

Waste Streams Generated: R003, D018, F005

Waste Code	Description of Process	Location
	Open - clear heavy liquid 55gals (glycol uncolored ?)	
	Tank WFS - Rosen 219 - ½ full? - ground top - east by roof water, oil, ? open at bottom not flowing out	
	N of Weld Shop - equip. boneyard separators taken apart - oil on ground,	N. of Weld Shop Boneyard
	3 places - ½ way from arroyo to other tank area next to dehydrator - pile of oily dirt separation sludge	
	2nd tank area - open 55 gallon ½ full - Carl says water	
	Paint sludge - 5 gallon open w/water on top - near N. paint area	
	Barrel upside down to drain on ground - North end	
	10-55 gal barrels - 1 - ½ full oily sludge - 5 full of ? probably crude oil	
	1 - Battery old - left on ground - upright	
	Used Oil from equipment	13-55 gal

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID —
Facility Name C.I.P., Inc.
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI —
Facility was Last Inspected on: —
Citizen Complaint _____
Observation by Inspector _____
Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business: _____

Waste Streams Generated: D018, F003, F005

Waste Code	Description of Process	Location
	2 - Large green tank - sludge - open drying - Sierra will test - Norm + AC + haul off. 140 barrels from Nat. Gas Condensate from Meridian Oil. Cas nr. 64741-47-5	
	Semi - body - diesel tank spill	— North
	Meridian - Burlington Oil Staining beside tanks	6865 - Nat Gas Condensa
	2 - 80 barrel tanks - oil sludge spill dried between them - running into arroyo. #2322 -	
	S/N 124 Tank Jot #2620 - 0 - 7 1/2 #884	
	1 - Tank - #73	
	Huerfano 157 - #1098	
	13 - 55 drums unknowns abandoned open - dried	— middle North Boundary
	13 - 5 gal barrels	
	10 - paint - 5 gal full - open	
	16 - 5 gals 22 - 1 gals	1 - 55 gal 3/4 full black

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID _____
Facility Name CIP, Inc
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI —
Facility was Last Inspected on: —
Citizen Complaint _____
Observation by Inspector _____
Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business: _____

Waste Streams Generated: F003, F005, D018

Waste Code	Description of Process	Location
	1 - barrel on its side behind pond Truck fuel fiberglass tank burned - oily film inside Between dehy's + tanks 5 gals - 80 / oil, paint, antifreeze 3-55 gals - full - 3-5 gals full unknown - antifreeze or crude oil out of equipment + Carl said Stained soil - took sample	North End
	~~Dehydrator / Seperator Area~~ next to arroyo 1 - leaking oil ~~still~~ leaking $CaCl_2$ - Carl Said	Dehyd / Separator area
	Badly stained soil - oily black West side 200 ft south of fence	
	middle section dehy's - oily leak dirt going to middle of road.	
	2-5 gal middle of yd. - UST's - barrel graveyard 10-55 by road - open leaking unknown	4-5 13

(7.

This Compliance Evaluation Inspection (CEI) was conducted based on:

EPA ID _____
Facility Name CIP, Inc
Date 2-15-01

FY: 01 Grant Requirements —
Follow up to Previous CEI —
Facility was Last Inspected on: —
Citizen Complaint yes
Observation by Inspector ~~BS~~, BS, BA, RT
Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

History, Size, and Nature of Business:

Waste Streams Generated: F003,5 D018

Waste Code	Description of Process	Location
?	Middle of yd by UST + empty 55gal white crystallized – down the slope	
	8-55 middle of dry area	
BTEX Metals	Soil pile - oil - stained pile - probably 8ft high x 35ft x 20ft + tank bottoms	
	3 full drums NW of pile unknown Closed.	
BTEX Metals	Large square open tank on skid on concrete pad 2/3 full oily sludge/water 21-55 barrels	North half of property
	Steam pad - water line to tank has leaked oil on ground underneath.	
BTEX Metals	3 tanks to steam pad - overflowed oily dirt - pad contamination 2 - 100 bbl + 70 bl all full oily water sludge.	

Results of Inspection: C/P has many unknown barrels + containers in poor condition, leaking just sitting all over the place.
C/P must determine if these are hazardous + dispose of it as such.
C/P has apparently cleaned out many oil + gas condensate tank bottoms with unknown disposal. Some has been put in the arroyo.

The Following Apparent Violations Were Noted:

Violative Condition	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
Failure to determine if Hazardous Waste		262.11
- Welding Shop		
- antifreeze on ground from pressure testing		
- 3 - 55 gal drums - East to Weld, near shed		
- 4 - 5 gal containers		
- sand trap - sump - tank oily water		
- 15 - 55 gallon ~~tank~~ drums unknown - some open		
- 1 - 5 gal		
Grind + Weld area		
8 - 5 gallon containers unknown closed		
North of Grind Shop		
13 - 55 gal unknown, open		
3 - 5 gal unknown, open paint or oily sludge		
Large Tank Farm - 5 - 80-110 bbl		tanks 262.11
- tank bottom sludge		
- 15 - 55 gal drums unknown some open, some leaking in bad condition		
- 61 - 5 gal containers		
- 4 - 5 gallon		
- 13 - 55 gallon drums unknown, full, some open		

EPA ID —
Facility Name CIP, Inc
Date 2-15-01

Results of Inspection: Some has been put in Sierra or Tierra Land Farm. Some is sitting in soil piles some has been poured on dirt. Ground water may have been contaminated Ground Water Bureau will be notified.

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
Failure to Determine If hazardous	Tank bottom sludge scraped out + put on arroyo	262.11
Failure to clean up Spills	Oily dirt - spills in many places. Oily dirt around sump near Weld shops + Oily spill all around the upper sumps on North half. Tanks overflowed	264.193 (b)(1)
Failure to dispose of Tank bottoms as hazardous waste.	Appeared to be dumping dried tank bottom sludge on side of arroyo. Also stored in large pile in center of property.	262.10(g)
Failure to dispose of oily soil as hazardous waste.	Only hauled off oily waste 1x in 5 years to Tierra or Sierra landfarm.	262.10(g)

EPA ID —
Facility Name CIP, Inc
Date 2-15-01

Results of Inspection: CIP is probably a Small Quantity Generator - which means he produces between 220-2,200 lbs of hazwaste per month. But at present he is storing Large Quantity amounts + for long periods. Once every waste just sitting around is cleaned up - will probably be able to stay in Small Quantity Generator status.

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
Exceeded the Small Quantity Generator Storage Limit of 6,000 Kg or 13,228 lbs	(are considered a Treatment, storage + disposal facility if the time frame is exceeded and must have a permit for that (40 CFR 270)	40CFR 262.34(d)(1
Exceeded 180 day storage limit (or 270 days if the waste must be transported over 200 miles) for a Small Quantity Generator		40 CFR 262.34(f)
Containers were not kept in good condition, closed - ~~not~~ were leaking.	58-55g. drums = 3,195 gals. x 8 lbs/gal = 25,560 lbs	40 CFR 262.34(d)(2) → 40 CFR 265.170-.178
Tanks were allowed to leak onto the ground without secondary containment.	81-5g pails = 405 gals x 8 lbs/gal = 3,240 lbs	40 CFR 262.34(d)(3) → 40 CFR 265.191(a)
Tanks did not have secondary containment to prevent leaks to the environment, a leak detection system, and did not clean up the spills within 24 hours of leak.	25,560 lbs + 3,240 lbs = 28,800 lbs probable haz waste stored at a minimum	40 CFR 262.34 (d)(3) → 40 CFR 265.193

xylene
Paint/thinner
Oily Sludge

EPA ID —
Facility Name CIP, Inc.
Date 2-15-01

Results of Inspection: No waste may be removed until a Waste analysis Plan is drawn up by CIP and approved by NMED. This plan should be sent to the Hazardous Waste Bureau within 15 days of this inspection.

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
Tanks & containers of used oily sludge did not have hazardous waste labels or start accumulation dates on those labels.		40 CFR 262.34 (d)(4) → 262.34 (a)(2 + 3)
Tank bottoms are being treated by being dried + spread on the land. No waste analysis plan was in effect.		40 CFR 262.34 (d)(4) → 268.7(a) →(5)
No emergency coordinator was available at all times. This ec name + phone number must be posted next to all telephones onsite. The location of fire extinguishers and spill control material + fire alarm (if there is one), or the telephone number of the fire department needs to be posted next to the phone.		40 CFR 262.34 (d)(5)
This generator does not have an EPA ID number.		40 CFR 262.12
Hazardous waste fees to state are owed for 2001, 2000 if you are Small or Large Quantity Generator.		20 NMAC 4.3.

Exit Conference:

EPA ID _____
Facility Name C.I.P., Inc
Date 2-16-01

Time of Exit: 8:00 am 2/16/01

Discussion/Explanation of Potential Violations yes

yes
Explain Review Process by NMED/HWB Management

30 days
NMED Anticipated Timetable for Notice of Violation Letter

yes
Explain Enforcement Policy and Procedures (incl. pos. penalties)

yes
Explain Availability of On Site Technical Assistance

Participants:

Name	Signature	Title	Phone #
Debby Burkhart		Prog. Mgr.	~~827-1558~~ ext 10
Ron Thurston		RCRA INSP.	827-1558 X2061

_____ I have been advised that at the time of inspection, no potential violations of 20 NMAC 4.1 were identified. I also understand that I remain obligated to comply with all applicable laws and regulations.

CP I have been advised of the potential violations identified during the inspection. I understand that in accordance with §74-4-10 NMSA 1978 (Repl. Pamp. 2000), NMED may: (1) issue a notice of violation requesting voluntary compliance within a specified time period; (2) issue a compliance order requiring compliance immediately or within a specified time period or assessing a civil penalty for any past or current violations of up to $10,000 per day of noncompliance with each violation or both; or (3) commence a civil action in district court for appropriate relief, including a temporary or permanent injunction. Any such order issued may include a suspension or revocation of any permit issued by NMED.

Carl Padilla
Facility Representative

CARL PADILLA — Pres.
BARBARA PADILLA — Sec./Treas.

REMANUFACTURER & SERVICE OF OILFIELD EQUIPMENT
GENERAL & MECHANICAL CONTRACTORS
NMLIC. # 033501
CIP .INC.
505-632-0977
FARMINGTON, NM

#51 Road 5570
Farmington, NM 87401
505/632-0977
FAX / 632-9120

March 7, 2001

O.C.D.
Attention: Mr. Jack Ford

CIP Inc. has engaged the services of Envirotech Inc. in assisting, supervising and providing proper direction. Please review the attached documents and advise.

Sincerely,

Carl Padilla

Carl Padilla

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

February 27, 2001

CIP Inc.
Attn: Carl Padilla
#51 Road 5570
Farmington, New Mexico 87401

505-632-0977
Fax 505-632-9120

Re: Workplan for mitigation of miscellaneous spills and leaks at the CIP yard

Dear Carl:

Envirotech Inc. is pleased to provide a proposal to mitigation spills and leaks at the CIP yard located on County Road 5570. "Housekeeping" appears to be the major issue with regard a recent citizen complaint filed with the New Mexico Environment Department's Hazardous Materials Bureau. We strongly recommend that this work plan be approved by the bureau before work begins. We also recommend that a representative of the bureau be invited to observe cleanup activities and be allowed the opportunity to sign off on completed work. We also recommend that the NMOCD be invited to observe the cleanup since the site has a discharge plan under their jurisdiction. The following is a summary of actions that should be completed to address issues identified by NMED HMB inspectors.

1) For purposes of an initial cleanup all surface oil stains, misc. paraffin leaks, and stained soil needs to be excavated and placed with your sludge pile at the center of the yard. The soil pile will then need to screened for Naturally Occurring Radioactive Materials (NORMs). (NMED HMB has already sampled for BTEX and RCRA 8 Metals). With completion of appropriate paperwork this soil can then be sent to Envirotech or Tierra for remediation.

   We recommend that removal of stains be documented by a third party. Cleanup to visual standards is typical. RCRA 8 Metals and USEPA 8021 (BTEX) analyses have already been conducted at most of the stained areas. Documentation of the spill cleanup could be an environmental consultant or the NMOCD field inspector. Documentation by an independent party will lend credibility to your cleanup program.

2) Drums, five gallon cans, one gallon cans, and other unlabeled containers of various sizes will need attention. The contents will need to be identified for proper disposal. We recommend that a complete inventory be conducted for two reasons. First, product that is useable will be identified for use by CIP personnel. Second, waste materials will be identified by type /source for disposal. It is critical during this process that products not be mixed or commingled. (If "hazardous"paint waste gets mixed in with otherwise exempt or non-hazardous materials the whole mix becomes hazardous, by EPA definition.) When this phase of the project is complete there should be no container on CIP property without a label or properly stored as an empty vessel.

   We anticipate that inventory and profiling various sizes of containers will generate the following general categories of waste; 1) flammable liquids, 2) flammable solids, 3) oily oilfield waste from

unknown sources (requiring a minimum of RCRA RCI and RCRA Metals analysis) and 4) used oil products. It may be that other characteristic materials will be found during the inventory and profile process.

We strongly recommend that CIP eliminate as many drums as possible. We recommend that any drums with holes, dents, damaged rings, or that are otherwise in poor condition be crushed and sent to a local vendor for recycling. Recognizing that CIP frequently uses drums for a variety of tasks, we recommend that good empties be properly cleaned and stored. Drums should have functional lids (to prevent rain water from getting inside) and should be sealed and stored on their sides so that they are not in contact with the ground. When a drum is placed in service for storing **any** material it should have a watertight lid properly secured between uses. When a drum is placed in service it should be labeled with a paint pen. The label should identify the date that accumulation of the contents began and the product or waste stream. If the material is hazardous waste such as xylene contaminated paint bottoms the drums should have a hazardous label identifying the contents.

3) When the inventory has been completed similar products will be bulked for profiling. It is critical at this stage of the project that hazardous and non-hazardous materials be carefully segregated. Analysis should be conducted as necessary to characterize the waste streams for disposal. Oil products may be recycled, oil contaminated soil in drums may go to Envirotech or Tierra for remediation, and paint related wastes will need to shipped to an EPA permitted facility for disposal.

Note that manifests / records should be kept for every waste stream leaving the facility.

4) We recommend that a report be prepared to document the whole process. The report should include photographs taken before, during, and after the cleanup. Bills of Lading or manifests should be included to document the disposition of all materials leaving the site (including a receipt for recycled steel from empty buckets and drums).

Envirotech recommends that CIP develop a Standard Operations Procedure for receiving oilfield and natural gas production equipment, cleaning and handling waste generated during the refurbishing process, disposal of the waste stream, and documentation of used equipment handled at CIP's facility. The following are some guidelines that are currently in use by other contractors providing similar services as that provided by CIP.

1) Request that NORMs analysis be conducted in the field for each piece of equipment received and that a NORMs certificate be provided for the unit. Not all operators have the capability to conduct NORMs Surveys and the interior of some vessels are not accessible for screening. It may be necessary to have someone on your staff become certified to calibrate and operate a survey instrument.

2) Document all information related to the origin of each unit received including: Unit Serial Number, Block Number, Section, Township, Range, County, well name, and operator.

3) Units that have been NORMs surveyed should be labeled with a parts paint pen, weather proof tag, or label to indicate results, who, when, and where the NORMs survey was conducted.

4) As units are reconditioned solids, sludges and other debris will be developed as the units are dismantled. All water and sludge should be contained on a "wash- pad" or similar area to prevent run-off from the cleaning area. Water can be recycled for washing purposes and other deleterious materials such as oils, glycols, amines, scale, and other waste associated with the refurbishing operations separated and containerized for disposal. This waste is typically "Exempt Oilfield" waste and can be disposed of at an NMOCD approved facility. To obtain NMOCD approval for the disposal event you will need an NMOCD Certificate of Waste Status, records of where the waste material came from (attach a list that includes data developed when the equipment was received), and a NORMs Survey.

We have the following general recommendations intended to improve "Housekeeping" issues that tend attract unwanted attention.

1) Encourage all personnel to dispose of rubbish (lunch bags, pop cans, empty paint cans, and other trash) in trash cans. Trash cans should be placed for convenient access and regularly emptied. Stress that rubbish and trash are not to be mixed into hazardous or oilfield waste streams.

2) Empty paint cans should be allowed to dry prior to disposal. Empty cans be recycled or sent to Waste Management for disposal. Lids should be left off. Empty is defined as "all wastes (product) removed that can be removed using practices commonly employed to remove materials from that type of container" *40 CFR 261.7(b)(1)(i)*.

3) When any product (oil, paint, soapy water) is removed from its original container for use at a work station one of the following should occur:

   a) If the smaller vessel is to remain in service at the work station it should have a lid in place when not in use and be clearly labeled.
   b) If the material is for a short term or occasional use, unused product should be returned to the original container and the temporary container placed upside down on a tray or rack to allow residual product to gather in a drip container.

4) Spills and leaks in the yard and around the shop should treated immediately.

5) Oily waste should never be placed on the ground (unless it is at a predetermined secure lined holding area pending appropriate disposal).

6) Cleaning activities should be well away from the natural wash that crosses the property to prevent any contamination to soil in the wash that would be impacted by storm water.

7) Sort through the drums currently on-site. Keep drums that are in good condition. Empty drums that are kept on-site should be stored on their sides with lids and bungs in place. (Oily soil should never be stored in an open top drum without a lid. Rain water will accumulate under a layer of water and eventually float the oil out of the drum and contaminate soil around the drum.) Recycle or dispose of damaged drums or drums without lids.

8) Drums that are in use should be stored with lids in place and on a surface that allows the bottoms to stay dry (on pallets, on slats when on concrete, or under roof).

9) Paint and xylene products should be used completely when possible. If paint waste is developed such as xylene bottoms, or unuseable paint they should be disposed of through an EPA permitted hazardous materials Treatment, Storage, and Disposal Facility (TSDF).

10) Inventory every product held on CIP's property. If the product is something that is in good condition and you use it, put it where it will be used appropriately. If you find unknown products, products that are not serviceable, or are no longer used in you operation make arrangements for their proper disposal.

If you have further questions or comments regarding this work plan or if we can be of service implementing this work please feel free to contact us at 505-632-0615.

Sincerely,

Envirotech Inc.

Harlan M Brown
Geologist / Hydrogeologist
New Mexico Certified Scientist #083

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC, NEW MEXICO 87410
(505) 334-6178 Fax (505)334-6170

GARY E. JOHNSON
GOVERNOR

JENNIFER A. SALISBURY
CABINET SECRETARY

CERTIFICATE OF WASTE STATUS

1. Generator Name and Address:	2. Destination Name: Envirotech Soil Remediation Facility Landarm #2 Hilltop, New Mexico
3. Originating Site (name): Attach list of originating sites as appropriate	Location of the Waste (Street address &/or ULSTR):
4. Source and Description of Waste	

I, _____ representative for:
(Print Name)

_____ do hereby certify that, according to the Resource Conservation and Recovery Act (RCRA) and Environmental Protection Agency's July, 1988, regulatory determination, the above described waste is: (Check appropriate classification)

___ **EXEMPT** oilfield waste

___ **NON-EXEMPT** oilfield waste which is non-hazardous by characteristic analysis or by product identification

and that nothing has been added to the exempt or non-exempt non-hazardous waste defined above.

For **NON-EXEMPT** waste the following documentation is attached (check appropriate items):

___ MSDS Information
___ RCRA Hazardous Waste Analysis
___ Chain of Custody
___ Other (description):

This waste is in compliance with Regulated Levels of Naturally Occurring Radioactive Material **(NORM)** pursuant to 20 NMAC 3.1 subpart 1403.C and D.

Name (Original Signature): _____

Title: _____

Date: _____

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	CIP	Project #:	92245-001
Sample ID:	CIP 10 B 2	Date Reported:	02-21-01
Lab ID#:	19228	Date Sampled:	02-16-01
Sample Matrix:	Soil	Date Received:	02-16-01
Preservative:	Cool	Date Analyzed:	02-19-01
Condition:	Cool and Intact	Chain of Custody:	8511

Parameter	Result	
IGNITABILITY:	**Negative**	
CORROSIVITY:	**Negative**	**pH = 8.16**
REACTIVITY:	**Negative**	

RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
IGNITABILITY:	Characteristic of Ignitability as defined by 40 CFR, Subpart C, Sec. 261.21. *(i.e. Sample ignition upon direct contact with flame or flash point < 60° C.)*
CORROSIVITY:	Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22. *(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)*
REACTIVITY:	Characteristic of Reactivity as defined by 40 CFR, Subpart C, Sec. 261.23. *(i.e. Violent reaction with water, strong base, strong acid, or the generation of Sulfide or Cyanide gases at STP with pH between 2.0 and 12.5)*

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: **#51 CR. 5570 South of Drums, West of Wash - Alkali.**

Analyst

Review

5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505 • 632 • 0615 • Fax 505 • 632 • 1865

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHODS 8010/8020
AROMATIC / HALOGENATED VOLATILE ORGANICS

Client:	CIP	Project #:	92245-001
Sample ID:	CIP 10 B 2	Date Reported:	02-21-01
Laboratory Number:	19228	Date Sampled:	02-16-01
Chain of Custody:	8511	Date Received:	02-16-01
Sample Matrix:	TCLP Extract	Date Extracted:	02-19-01
Preservative:	Cool	Date Analyzed:	02-20-01
Condition:	Cool & Intact	Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limits (mg/L)
Vinyl Chloride	**ND**	**0.0001**	**0.2**
1,1-Dichloroethene	**ND**	**0.0001**	**0.7**
2-Butanone (MEK)	**ND**	**0.0001**	**200**
Chloroform	**ND**	**0.0001**	**6.0**
Carbon Tetrachloride	**ND**	**0.0001**	**0.5**
Benzene	**ND**	**0.0001**	**0.5**
1,2-Dichloroethane	**ND**	**0.0001**	**0.5**
Trichloroethene	**ND**	**0.0003**	**0.5**
Tetrachloroethene	**ND**	**0.0005**	**0.7**
Chlorobenzene	**ND**	**0.0003**	**100**
1,4-Dichlorobenzene	**ND**	**0.0002**	**7.5**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	Trifluorotoluene	**98%**
	Bromofluorobenzene	**99%**

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 5030, Purge-and-Trap, SW-846, USEPA, July 1992.
Method 8010, Halogenated Volatile Organic, SW-846, USEPA, Sept. 1994.
Method 8020, Aromatic Volatile Organics, SW-846, USEPA, Sept. 1994.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **#51 CR. 5570 South of Drums, West of Wash - Alkali.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8040
PHENOLS

Client:	CIP	Project #:	92245-001
Sample ID:	CIP 10 B 2	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	02-16-01
Chain of Custody:	8511	Date Received:	02-16-01
Sample Matrix:	TCLP Extract	Date Extracted:	02-19-01
Preservative:	Cool	Date Analyzed:	02-22-01
Condition:	Cool & Intact	Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limit (mg/L)
o-Cresol	**ND**	**0.020**	**200**
p,m-Cresol	**ND**	**0.040**	**200**
2,4,6-Trichlorophenol	**ND**	**0.020**	**2.0**
2,4,5-Trichlorophenol	**ND**	**0.020**	**400**
Pentachlorophenol	**ND**	**0.020**	**100**

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	2-Fluorophenol	**98%**
	2,4,6-Tribromophenol	**99%**

References: Method 1311, Toxicity Characteristic Leaching Procedure Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8040, Phenols, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, July 1, 1992.

Comments: **#51 CR. 5570 South of Drums, West of Wash - Alkali.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8090
Nitroaromatics and Cyclic Ketones
TCLP Base/Neutral Organics

Client:	CIP	Project #:	92245-001
Sample ID:	CIP 10 B 2	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	02-16-01
Chain of Custody:	8511	Date Received:	02-16-01
Sample Matrix:	TCLP Extract	Date Extracted:	02-19-01
Preservative:	Cool	Date Analyzed:	02-22-01
Condition:	Cool and Intact	Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Limit (mg/L)
Pyridine	**ND**	**0.020**	**5.0**
Hexachloroethane	**ND**	**0.020**	**3.0**
Nitrobenzene	**ND**	**0.020**	**2.0**
Hexachlorobutadiene	**ND**	**0.020**	**0.5**
2,4-Dinitrotoluene	**ND**	**0.020**	**0.13**
HexachloroBenzene	**ND**	**0.020**	**0.13**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	2-fluorobiphenyl	**99%**

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 3510, Separatory Funnel Liquid-Liquid Extraction, SW-846, USEPA, July 1992.
Method 8090, Nitroaromatics and Cyclic Ketones, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **#51 CR. 5570 South of Drums, West of Wash - Alkali.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 1311
TOXICITY CHARACTERISTIC LEACHING PROCEDURE
TRACE METAL ANALYSIS

Client:	CIP	Project #:	92245-001
Sample ID:	CIP 10 B 2	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	02-16-01
Chain of Custody:	8511	Date Received:	02-16-01
Sample Matrix:	TCLP Extract	Date Analyzed:	02-22-01
Preservative:	Cool	Date Extracted:	02-19-01
Condition:	Cool & Intact	Analysis Needed:	TCLP metals

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Level (mg/L)
Arsenic	**0.008**	**0.001**	**5.0**
Barium	**0.105**	**0.001**	**100**
Cadmium	**0.011**	**0.001**	**1.0**
Chromium	**0.008**	**0.001**	**5.0**
Lead	**0.023**	**0.001**	**5.0**
Mercury	**ND**	**0.001**	**0.2**
Selenium	**0.002**	**0.001**	**1.0**
Silver	**0.004**	**0.001**	**5.0**

ND - Parameter not detected at the stated detection limit.

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, December 1996.

Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, December 1996.

Methods 6010B Analysis of Metals by Inductively Coupled Plasma-Atomic Emission SW-846, USEPA. December 1996.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, August 24, 1998.

Comments: **#51 CR. 5570 South of Drums, West of Wash - Alkali.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

QUALITY ASSURANCE / QUALITY CONTROL

DOCUMENTATION

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHODS 8010/8020
AROMATIC / HALOGENATED VOLATILE ORGANICS
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	02-21-01
Laboratory Number:	02-20-TCV	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-20-01
Condition:	N/A	Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limits (mg/L)
Vinyl Chloride	ND	0.0001	0.2
1,1-Dichloroethene	ND	0.0001	0.7
2-Butanone (MEK)	ND	0.0001	200
Chloroform	ND	0.0001	6.0
Carbon Tetrachloride	ND	0.0001	0.5
Benzene	ND	0.0001	0.5
1,2-Dichloroethane	ND	0.0001	0.5
Trichloroethene	ND	0.0003	0.5
Tetrachloroethene	ND	0.0005	0.7
Chlorobenzene	ND	0.0003	100
1,4-Dichlorobenzene	ND	0.0002	7.5

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	Trifluorotoluene	100%
	Bromofluorobenzene	100%

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 5030, Purge-and-Trap, SW-846, USEPA, July 1992.
Method 8010, Halogenated Volatile Organic, SW-846, USEPA, Sept. 1994.
Method 8020, Aromatic Volatile Organics, SW-846, USEPA, Sept. 1994.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for sample 19228.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHODS 8010/8020
AROMATIC / HALOGENATED VOLATILE ORGANICS
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Method Blank	Date Reported:	02-21-01
Laboratory Number:	02-19-TCV	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-20-01
Condition:	N/A	Date Extracted:	02-19-01
		Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limits (mg/L)
Vinyl Chloride	ND	0.0001	0.2
1,1-Dichloroethene	ND	0.0001	0.7
2-Butanone (MEK)	ND	0.0001	200
Chloroform	ND	0.0001	6.0
Carbon Tetrachloride	ND	0.0001	0.5
Benzene	ND	0.0001	0.5
1,2-Dichloroethane	ND	0.0001	0.5
Trichloroethene	ND	0.0003	0.5
Tetrachloroethene	ND	0.0005	0.7
Chlorobenzene	ND	0.0003	100
1,4-Dichlorobenzene	ND	0.0002	7.5

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	Trifluorotoluene	99%
	Bromofluorobenzene	98%

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 5030, Purge-and-Trap, SW-846, USEPA, July 1992.
Method 8010, Halogenated Volatile Organic, SW-846, USEPA, Sept. 1994.
Method 8020, Aromatic Volatile Organics, SW-846, USEPA, Sept. 1994.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for sample 19228.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHODS 8010/8020 AROMATIC / HALOGENATED VOLATILE ORGANICS QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	02-21-01
Laboratory Number:	19228	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Analysis Requested:	TCLP	Date Analyzed:	02-20-01
Condition:	N/A	Date Extracted:	N/A

Parameter	Sample Result (mg/L)	Duplicate Sample Result (mg/L)	Detection Limits (mg/L)	Percent Difference
Vinyl Chloride	**ND**	**ND**	**0.0001**	**0.0%**
1,1-Dichloroethene	**ND**	**ND**	**0.0001**	**0.0%**
2-Butanone (MEK)	**ND**	**ND**	**0.0001**	**0.0%**
Chloroform	**ND**	**ND**	**0.0001**	**0.0%**
Carbon Tetrachloride	**ND**	**ND**	**0.0001**	**0.0%**
Benzene	**ND**	**ND**	**0.0001**	**0.0%**
1,2-Dichloroethane	**ND**	**ND**	**0.0001**	**0.0%**
Trichloroethene	**ND**	**ND**	**0.0003**	**0.0%**
Tetrachloroethene	**ND**	**ND**	**0.0005**	**0.0%**
Chlorobenzene	**ND**	**ND**	**0.0003**	**0.0%**
1,4-Dichlorobenzene	**ND**	**ND**	**0.0002**	**0.0%**

ND - Parameter not detected at the stated detection limit.

References:
Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 5030, Purge-and-Trap, SW-846, USEPA, July 1992.
Method 8010, Halogenated Volatile Organic, SW-846, USEPA, Sept. 1994.
Method 8020, Aromatic Volatile Organics, SW-846, USEPA, Sept. 1994.

Comments: **QA/QC for sample 19228.**

Analyst

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHODS 8010/8020 AROMATIC / HALOGENATED VOLATILE ORGANICS QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Spike	Date Reported:	02-21-01
Laboratory Number:	19228	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Analysis Requested:	TCLP	Date Analyzed:	02-20-01
Condition:	N/A	Date Extracted:	N/A

Parameter	Sample Result (mg/L)	Spike Added (mg/L)	Spiked Sample Result (mg/L)	Det. Limit (mg/L)	Percent Recovery	SW-846 % Rec. Accept. Range
Vinyl Chloride	ND	0.050	0.0495	0.0001	99%	28-163
1,1-Dichloroethene	ND	0.050	0.0494	0.0001	99%	43-143
2-Butanone (MEK)	ND	0.050	0.0490	0.0001	98%	47-132
Chloroform	ND	0.050	0.0500	0.0001	100%	49-133
Carbon Tetrachloride	ND	0.050	0.0490	0.0001	98%	43-143
Benzene	ND	0.050	0.0495	0.0001	99%	39-150
1,2-Dichloroethane	ND	0.050	0.0490	0.0001	98%	51-147
Trichloroethene	ND	0.050	0.0495	0.0003	99%	35-146
Tetrachloroethene	ND	0.050	0.0495	0.0005	99%	26-162
Chlorobenzene	ND	0.050	0.0495	0.0003	99%	38-150
1,4-Dichlorobenzene	ND	0.050	0.0495	0.0002	99%	42-143

ND - Parameter not detected at the stated detection limit.

References:
Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 5030, Purge-and-Trap, SW-846, USEPA, July 1992.
Method 8010, Halogenated Volatile Organic, SW-846, USEPA, Sept. 1994.
Method 8020, Aromatic Volatile Organics, SW-846, USEPA, Sept. 1994.

Comments: **QA/QC for sample 19228.**

Analyst

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8040
PHENOLS
Quality Assurance Report
Laboratory Blank

Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	02-22-01
Laboratory Number:	02-22-TCA	Date Sampled:	N/A
Sample Matrix:	2-Propanol	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-22-01
Condition:	N/A	Analysis Requested:	TCLP

Analytical Results Parameter	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limit (mg/L)
o-Cresol	ND	0.020	200
p,m-Cresol	ND	0.040	200
2,4,6-Trichlorophenol	ND	0.020	2.0
2,4,5-Trichlorophenol	ND	0.020	400
Pentachlorophenol	ND	0.020	100

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	2-fluorophenol	98 %
	2,4,6-tribromophenol	99 %

References: Method 1311, Toxicity Characteristic Leaching Procedure Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8040, Phenols, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8040
PHENOLS
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Method Blank	Date Reported:	02-22-01
Laboratory Number:	02-19-TCA	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	Cool	Date Extracted:	02-19-01
Condition:	Cool & Intact	Date Analyzed:	02-22-01
		Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Limit (mg/L)
o-Cresol	ND	0.020	200
p,m-Cresol	ND	0.040	200
2,4,6-Trichlorophenol	ND	0.020	2.0
2,4,5-Trichlorophenol	ND	0.020	400
Pentachlorophenol	ND	0.020	100

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	2-Fluorophenol	98%
	2,4,6-Tribromophenol	99%

References: Method 1311, Toxicity Characteristic Leaching Procedure Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8040, Phenols, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8040
PHENOLS
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	Cool	Date Extracted:	02-19-01
Condition:	Cool & Intact	Date Analyzed:	02-22-01
		Analysis Requested:	TCLP

Parameter	Sample Result (mg/L)	Duplicate Result (mg/L)	Detection Limit (mg/L)	Percent Difference
o-Cresol	**ND**	**ND**	**0.020**	**0.0%**
p,m-Cresol	**ND**	**ND**	**0.040**	**0.0%**
2,4,6-Trichlorophenol	**ND**	**ND**	**0.020**	**0.0%**
2,4,5-Trichlorophenol	**ND**	**ND**	**0.020**	**0.0%**
Pentachlorophenol	**ND**	**ND**	**0.020**	**0.0%**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Maximum Difference
	8040 Compounds	**30.0%**

References: Method 1311, Toxicity Characteristic Leaching Procedure Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8040, Phenols, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8090
Nitroaromatics and Cyclic Ketones
TCLP Base/Neutral Organics
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	02-22-01
Laboratory Number:	02-22-TBN	Date Sampled:	N/A
Sample Matrix:	Hexane	Date Received:	N/A
Preservative:	N/A	Date Extracted:	N/A
Condition:	N/A	Date Analyzed:	02-22-01
		Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Limit (mg/L)
Pyridine	**ND**	**0.020**	**5.0**
Hexachloroethane	**ND**	**0.020**	**3.0**
Nitrobenzene	**ND**	**0.020**	**2.0**
Hexachlorobutadiene	**ND**	**0.020**	**0.5**
2,4-Dinitrotoluene	**ND**	**0.020**	**0.13**
HexachloroBenzene	**ND**	**0.020**	**0.13**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	2-fluorobiphenyl	**96%**

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 3510, Separatory Funnel Liquid-Liquid Extraction, SW-846, USEPA, July 1992.
Method 8090, Nitroaromatics and Cyclic Ketones, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8090
Nitroaromatics and Cyclic Ketones
TCLP Base/Neutral Organics
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	Method Blank	Date Reported:	02-22-01
Laboratory Number:	02-19-TBN	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	Cool	Date Extracted:	02-19-01
Condition:	Cool and Intact	Date Analyzed:	02-22-01
		Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Limit (mg/L)
Pyridine	**ND**	**0.020**	**5.0**
Hexachloroethane	**ND**	**0.020**	**3.0**
Nitrobenzene	**ND**	**0.020**	**2.0**
Hexachlorobutadiene	**ND**	**0.020**	**0.5**
2,4-Dinitrotoluene	**ND**	**0.020**	**0.13**
HexachloroBenzene	**ND**	**0.020**	**0.13**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Percent Recovery
	2-fluorobiphenyl	**96%**

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 3510, Separatory Funnel Liquid-Liquid Extraction, SW-846, USEPA, July 1992.
Method 8090, Nitroaromatics and Cyclic Ketones, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8090
Nitroaromatics and Cyclic Ketones
TCLP Base/Neutral Organics
QA/QC Matrix Duplicate Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Preservative:	N/A	Date Extracted:	02-19-01
Condition:	N/A	Date Analyzed:	02-22-01
		Analysis Requested:	TCLP

Parameter	Sample Result (mg/L)	Duplicate Result (mg/L)	Percent Difference	Det. Limit (mg/L)
Pyridine	**ND**	**ND**	**0.0%**	**0.020**
Hexachloroethane	**ND**	**ND**	**0.0%**	**0.020**
Nitrobenzene	**ND**	**ND**	**0.0%**	**0.020**
Hexachlorobutadiene	**ND**	**ND**	**0.0%**	**0.020**
2,4-Dinitrotoluene	**ND**	**ND**	**0.0%**	**0.020**
HexachloroBenzene	**ND**	**ND**	**0.0%**	**0.020**

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria	Parameter	Maximum Difference
	8090 Compounds	**30%**

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, July 1992.
Method 3510, Separatory Funnel Liquid-Liquid Extraction, SW-846, USEPA, July 1992.
Method 8090, Nitroaromatics and Cyclic Ketones, SW-846, USEPA, Sept. 1986.

Note: Regulatory Limits based on 40 CFR part 261 Subpart C section 261.24, July 1, 1992.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 1311
TOXICITY CHARACTERISTIC LEACHING PROCEDURE
TRACE METAL ANALYSIS
Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	02-22-TCM QA/QC	Date Reported:	02-22-01
Laboratory Number:	19228	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Analysis Requested:	TCLP Metals	Date Analyzed:	02-22-01
Condition:	N/A	Date Extracted:	N/A

Blank & Duplicate Conc. (mg/L)	Instrument Blank	Method Blank	Detection Limit	Sample	Duplicate	% 0.105	Acceptance 0.107
Arsenic	**ND**	**ND**	**0.001**	**0.008**	**0.008**	**0.0%**	**0% - 30%**
Barium	**ND**	**ND**	**0.001**	**0.105**	**0.107**	**1.9%**	**0% - 30%**
Cadmium	**ND**	**ND**	**0.001**	**0.011**	**0.011**	**0.0%**	**0% - 30%**
Chromium	**ND**	**ND**	**0.001**	**0.008**	**0.008**	**0.0%**	**0% - 30%**
Lead	**ND**	**ND**	**0.001**	**0.023**	**0.023**	**0.0%**	**0% - 30%**
Mercury	**ND**	**ND**	**0.001**	**ND**	**ND**	**0.0%**	**0% - 30%**
Selenium	**ND**	**ND**	**0.001**	**0.002**	**0.002**	**0.0%**	**0% - 30%**
Silver	**ND**	**ND**	**0.001**	**0.004**	**0.004**	**0.0%**	**0% - 30%**

Spike Conc. (mg/L)	Spike Added	Sample	Spiked Sample	Percent Recovery	Acceptance Range
Arsenic	**0.500**	**0.008**	**0.508**	**100.0%**	**80% - 120%**
Barium	**0.500**	**0.105**	**0.605**	**100.0%**	**80% - 120%**
Cadmium	**0.500**	**0.011**	**0.510**	**99.8%**	**80% - 120%**
Chromium	**0.500**	**0.008**	**0.507**	**99.8%**	**80% - 120%**
Lead	**0.500**	**0.023**	**0.521**	**99.6%**	**80% - 120%**
Mercury	**0.050**	**ND**	**0.049**	**98.0%**	**80% - 120%**
Selenium	**0.500**	**0.002**	**0.501**	**99.8%**	**80% - 120%**
Silver	**0.500**	**0.004**	**0.503**	**99.8%**	**80% - 120%**

ND - Parameter not detected at the stated detection limit.

References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, Dec. 1996

Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, December 1996.

Methods 6010B Analysis of Metals by Inductively Coupled Plasma-Atomic Emission, SW-846, USEPA, December 1996.

Comments: **QA/QC for samples 19228 and 19233.**

Analyst

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CHAIN OF CUSTODY RECORD

08511

Client / Project Name	Project Location	ANALYSIS / PARAMETERS
CIP	#51 CR. 5570	

Sampler:	Client No.
HARLAN M. BROWN	92245-001

Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix	No. of Containers	TCLP w/o Hg						Remarks
CIP 10B2	2.16.01	11:30	19228	Soil	1	✓						South of Drums west of WASH-Alkali

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Harlan M Brown	2.16.01	12:20	Christine Waltz	2/16/01	12:20
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

ENVIROTECH INC.

5796 U.S. Highway 64
Farmington, New Mexico 87401
(505) 632-0615

Sample Receipt	Y	N	N/A
Received Intact	✓		
Cool - Ice/Blue Ice	✓		

June 15, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 0494

Mr. Carl Padilla
CIP, Inc.
#51 County Road 5570.
Farmington, NM 87401

RE: NOTICE OF VIOLATION
CIP, Inc.
Farmington Service Facility
San Juan County, New Mexico

Dear Mr. Padilla:

On May 23, 2001 personnel from the New Mexico Oil Conservation Division (OCD) together with Mr. Carl Padilla, of CIP, Inc. and Mr. Harlan Brown, Envirotech, Inc., CIP's consultant firm conducted an inspection of the above captioned facility at #51 County Road 5570, Farmington, New Mexico. This facility is covered by an approved discharge plan, GW-228, issued May 9, 1996. The inspection of the facility by the OCD indicated a number of violations of terms and conditions of the discharge plan together with violations of statues of the Water Quality Act and the Oil and Gas Act.

CIP, Inc.'s failure to report spills and/or leaks of exempt crude oil, tank bottoms and/or BS&W from tanks at your site which were delivered from E & P locations for repair and reconditioning is a violation of requirements set forth in the approved discharge plan and attached stipulations, and Water Quality Control Commission (WQCC) rules and regulations, specifically Section 1203.A. and OCD Rule 19.15.5.313 and Rule 116.

CIP, Inc.'s failure to inventory, label, and characterize fluids and solids in stored drums, store drums on an impermeable pad and curb type containment is a violation of the requirements specified in the discharge plan stipulation number 3.

CIP, Inc.'s failure to consolidate and store empty drums in a manner specified in stipulation number 3 of the discharge plan is a violation of the terms and conditions of the discharge plan.

CIP, Inc.'s failure to inventory and provide proper documentation of surveys for Natural Occurring Radioactive Materials (NORMS) on used oil and gas field equipment delivered to CIP, Inc.'s site is a violation of OCD Rule 115.

CIP, Inc.'s poor housekeeping methods which allow the dumping of open containers, tires, and other used oil and gas field equipment and parts into known natural drainage paths (water course) is a violation of the requirements of the discharge plan and WQCC rules and regulations, specifically Section 1201 and OCD Rule 13.B.

CIP, Inc.'s failure to comply with the approved workplan schedule and proceed in a timely and prudent manner to complete the required remediation is a violation of OCD Rule 116.D.

CIP, Inc. may be subject to the civil penalties provided in Section 74-6-10.1 NMSA 1978 of the New Mexico Water Quality Act for failure to comply. To avoid further enforcement action, you must commence the required remediation no later than July 1, 2001. If you have any questions please contact Mr. W. Jack Ford at (505) 827-7156.

Sincerely,

Lori Wrotenbery, Director
Oil Conservation Division

LW/wjf

cc: Aztec OCD District Office