

GW - 319

**INSPECTIONS &
DATA**

Environmental Facility Inspection

Facility Name **R&R SERVICE CO.** Time Out **10:00** Time In **10:30** Hrs
Inspector **Wayne Price** DT Mod **8/25/2004** Purpose **Status Check**
Inspection Date **08/19/2004** Inspect No. **6LWP0423829390** Type **Field Inspection**

Violations / Documentation

List Violations or Indicate Compliance

Specific Violation
Contamination observed on ground surface

Additional Violation Notes

R&R had comitted to a clean-up action. Action has not been performed.

Documentation Acquired: Samples Statements Sketch Video Photos

Compliance Items (Checked Items Denote Non-Compliance)

Write Compliance Based on this Inspection

- Drums Process AG Tanks AG Saddle Tk Labeling Tanks/Sumps Permits
 UG Lines WD Practice Class V Housekeepin Spill Rpt Potential ENV Wtr Wells

Describe Remedial Action Required

unlined pit with oil

Use [SHIFT] + [F2] to Expand any Notes or Comment Field



OCD ENVIRONMENTAL BUREAU
SITE INSPECTION SHEET

DATE: 6/18/99 Time: 2 10 AM

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# _____

FACILITY NAME: R+R SERVICES CO. (SAND BLAST + COATING)

PHYSICAL LOCATION: 1500 W. BROADWAY PL -

Legal: QRT QRT Sec TS R _____ County LEA HOBBS NM

OWNER/OPERATOR (NAME) BOB STRASNER

Contact Person: SAB Tele:# 505-393-5661

MAILING ADDRESS: SAB State NM ZIP 88240

Owner/Operator Rep's: BOB STRASNER

OCD INSPECTORS: W PRICE, J FORD, D WILLIAMS

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.

FULL + EMPTY DRUMS BEING STORED WITHOUT PAD + CURB.

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.

SANDBLAST AREA HAS NO CONTAINMENT.

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

PAINT WASTE TANK DOES NOT HAVE CONTAINMENT. PAINT WASTE

WAS OBSERVED TO BE LEAKING ONTO GROUND AROUND TANK.

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

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

WASTE TANKS DO NOT HAVE LABELS.

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.

NONE OBSERVED AT THIS TIME. - SHOP LOCKED COULD NOT INSPECT.

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.

SAME AS #6.

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.

- SANDBLAST WASTE DISPOSED OF ON-SITE NO CONTAINMENT.
- SOLID WASTE FROM SANDBLASTING & PAINTING OPERATIONS STORED WITH NO CONTAINMENT.

WASTE STREAMS HAVE NOT BEEN IDENTIFIED AND CHARACTERIZED TO DETERMINE IF EPA RCRA HAZARDOUS WASTE.

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!

UNKNOWN

DID NOT INSPECT PAINT SHOP - LOCKED

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.

THERE APPEARS TO BE NO EFFORT MADE IN HOUSEKEEPING. - NO RECORDS

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

OILFIELD WASTE HAS BEEN DISPOSED OF ON-SITE, LEAKS & SPILLS WERE OBSERVED - R&R HAS NOT NOTIFIED OCD - VIOLATION OF OCD RULE 116.

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

YES - OPEN UNLINED DISPOSAL PIT CONTAINING RCRA NON-EXEMPT WASTE, I.E. EMPTY DRUMS, OLD DRUMS, OIL, BUCKETS, TRASH, ETC.

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

UNKNOWN

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

UNKNOWN

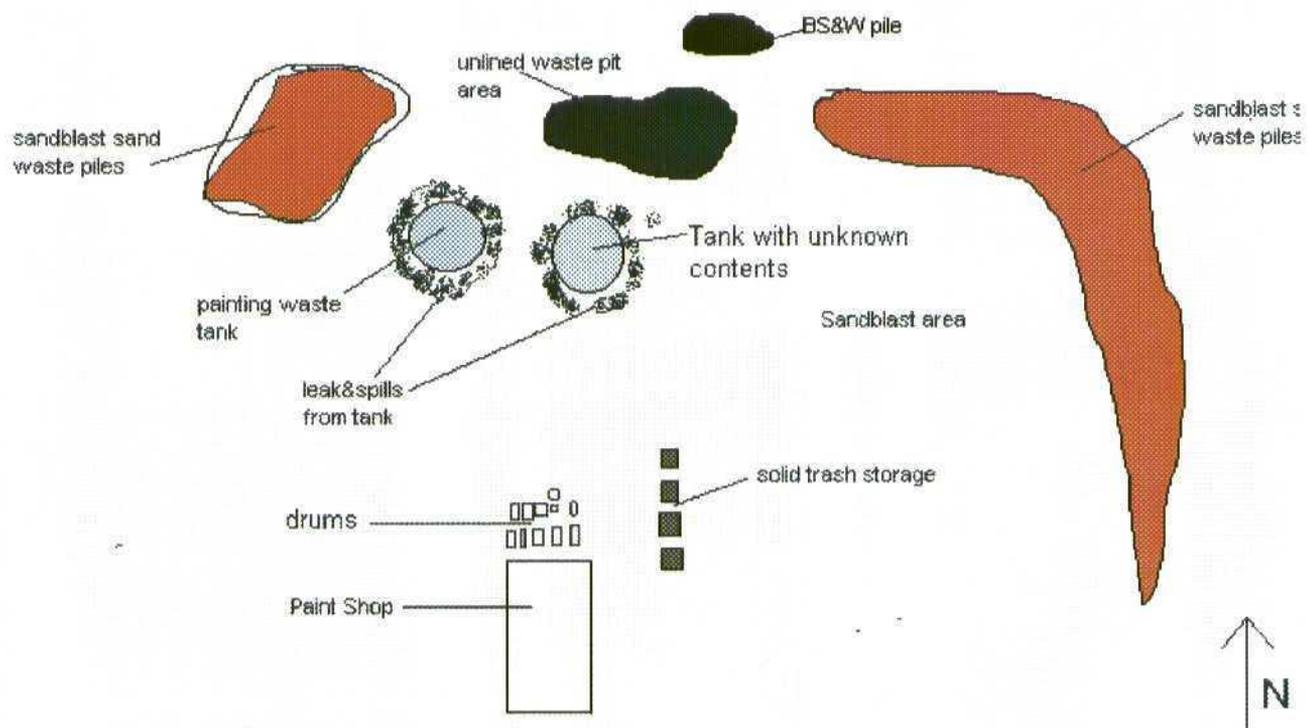
Miscellaneous Comments:

MR STRASNER (R&R) HAS BEEN GIVING NOTICE BY OCD INSPECTORS NOT TO DISPOSE OF ANY WASTE WITHOUT OCD APPROVAL.

Number of Photos taken at this site: SEE FILE PICTURES TAKEN ON 6-3-99

attachments-

PAGE 4 SKETCH



Broadway place st.

<p>R&R Service CO. 1500 w. Broadway pl Hobbs, NM</p>	<p>Site Inspection 6/18/99 DRWG. BY Wprice</p>
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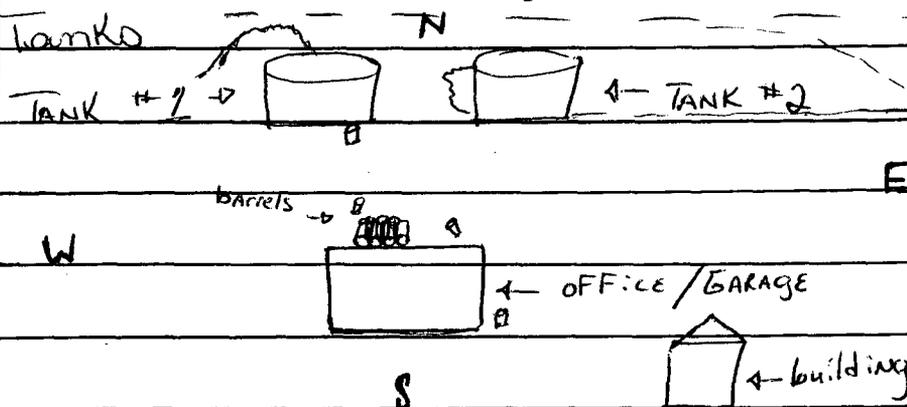
NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

Name Donna Williams Date 6-3-99 Miles _____ District I
Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Donna Williams

Inspected R/R yard, the owner/operator is Bob Strasser; inside of yard to the north are 2 tanks



*AREA is NOT fenced to keep out public/kids. Oil standing north of tank #2, inside of oil is barrels, filters, paint cans, etc... just east of standing oil are some shingles - possible asbestos, sand covering entire yard from sandblasting - possible lead trace paint. barrels standing, laying around and stacked w/ UN # 1816 on them - Resin Sol'n - later a 3 in flammable

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

OVER ->

TYPE INSPECTION PERFORMED

INSPECTION CLASSIFICATION

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

- H = Housekeeping
- P = Plugging
- C = Plugging Cleanup
- T = Well Test
- R = Repair/Workover
- F = Waterflow
- M = Mishap or Spill
- W = Water Contamination
- O = Other

- U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
- R = Inspections relating to Reclamation Fund Activity
- O = Other - Inspections not related to injection or The Reclamation Fund
- E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

- D = Drilling
- P = Production
- I = Injection
- C = Combined prod. inj. operations
- S = SWD
- U = Underground Storage
- G = General Operation
- F = Facility or location
- M = Meeting
- O = Other

empty barrels stack \approx 6 rows high, stacked on side
barrels were not rinsed before stored.

Tank #1 appears to be used as a "Catch-All" where
excess solⁿ has been disposed of, also barrels/buckets
(possible - paint buckets) inside tank. Pictures have
been taken and are included. Visited w/ Bob Strasen,
informed Bob that Santa Fe would be in contact
w/him. Bob states they do not have a
discharge plan. Bob Strasen's phone # is 393-5661
Address is 1500 W. Broadway Place, Hobbs NM 88240.



R&R SERVICES 6-3-99
Bucket full of oil setting on S.E. side
of Tank #1
by Donna Williams



R&R SERVICES 6-3-99
Picture of Tank#1/facing north
pile of sandblasting sand
by Donna Williams

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R&R SERVICES 6-3-99
facing South: Tank#1 has excess
Resin Sol'n and buckets, trash inside
Tank #2 old harden oil
by Donna Williams



R&R SERVICES 6-3-99
facing East: Trash, oily dirt
evidence of old oil contamination
by Donna Williams

PHOTO COURTESY OF R&R SERVICES



R&R SERVICES 6-3-99
view of buckets, bbls, and
notice oil filter on top of barrel
by Donna Williams



R&R SERVICES 6-3-99
facing South: oil with buckets/bbls
trash in standing oil
by Donna Williams

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R&R SERVICES 6-3-99
oil standing w/barrels, trash etc...
facing North
by Donna Williams



R&R SERVICES 6-3-99
behind & beside Tank #1
sandblasting sand
by Donna Williams



R&R SERVICES 6-3-99
behind Tank #2 oil, trash,
shingles (possible-asbestos)
by Donna Williams



R&R SERVICES 6-3-99
behind Tank#2: facing North EAST
oil standing, bbls, shingles, trash
by Donna Williams



R&R SERVICES 6-3-99
empty buckets stacked on N. side
of garage/sandblasting sand on grd.
by Donna Williams

2025 RELEASE UNDER E.O. 14176