NM1 - 7

INSPECTIONS & DATA

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

August 22, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-328

Mr. Morris D. Young
Envirotech, Inc.
5796 U.S. Highway 64-3014
Farmington, NM 87401

RE: Landfarm #1 Inspection (NM-01-0007)
Envirotech, Inc.
NE/4 SE/4, of Section 26, Township 27 North, Range 11 West, NMPM
San Juan County, New Mexico

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD), inspected Envirotech, Inc. Landfarm #1 (Envirotech #1) located in the NE/4 SE/4, of Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico on June 10, 1997.

Overall the OCD found Envirotech #1 to have a well maintained landfarm with good security. The OCD inspection and current file review of Envirotech #1 indicates some permit deficiencies. Attachment #1 lists the permit deficiencies found at Envirotech #1 during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. Envirotech #1 shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. A response is required by Envirotech #1 to these deficiencies by October 24, 1997.

Pursuant to Order R-10411-B the OCD General Rule 711 has been revised. The OCD is currently in the process of re-permitting all surface waste management facilities under the new Rule 711. Envirotech #1 landfarm is included under the new Rule 711. A copy of Order R-10411-B along with the new bond forms were given to you (Morris D. Young) during the OCD inspection on June 10, 1997. An additional set of these forms and the Order is included with this report. A permit application, Form C-137 (attachment 3), shall be filed with the OCD according to the instructions in Attachment 1, Section 14.

Please be advised that the bonding requirements have changed under the new Rule 711. Envirotech #1's current cash bond (bond No 868997) for $25,000 will need to be replaced. The bonded amount will be based upon the estimated closure costs that the State of New Mexico would incur

if a third party contractor were to remediate the facility (see Rule 711.B.1.i and 711.B.3). Envirotech #1 must have a new bond in place for the approved estimated closure amount prior to receiving a new waste management facility permit.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kieling
Environmental Geologist

Attachments
xc: Aztec OCD Office

ATTACHMENT 1
INSPECTION REPORT
June 10, 1997
ENVIROTECH, INC. LANDFARM #1
NE/4 SE/4, of Section 26, Township 27 North, Range 11 West, NMPM)
SAN JUAN COUNTY, NEW MEXICO

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

   Facility is secured with fence and locking gate and has a sign at the entrance. A section of the fence line has been moved (see pictures 3). The area remains part of the permitted facility and will have to be remediated as such.

2. Berming : An adequate berm will be constructed and maintained to prevent runoff and runon for that portion of the facility containing contaminated soils.

   Cell berms are in good shape and well maintained.

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within fifty (50) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

   All future cells constructed must follow the setback requirements.

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

   At the time of inspection, soils had been spread and disked accordingly (see picture 3, 4, 5, 6, and 7). Within those cells that have not been approved for discontinued maintenance status the biweekly disking program should be maintained until biodegradation of contaminants is complete and discontinued maintenance status is approved. This includes the area that is fenced off (see pictures 3).

The soil that was removed from the hazardous waste barrel area and is now fenced, east of the rubble pile, is considered a cell and must be remediated accordingly. The soil pile should be sampled and analytical results reviewed by the OCD prior to removal of pile.

5. Free Liquids : No free liquids or soils with free liquids will be accepted at the facility.

   NA There were no free liquids at the facility.

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

   Plastic within cells must be removed and properly disposed of. Most cells were free of plastic (see picture 3, 4, 5 and 6). However, the rubble pile that is near the remediated hazardous waste dump contained scrap iron, plastic, and other wastes. Trash within this rubble pile must be removed and properly disposed of prior to facility closure.

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

   N/A There are no above ground tanks located at this facility.

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

   N/A There are no drums located at this facility.

   All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

9. 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.

   N/A There are no saddle tanks located at this facility.

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

N/A There are no tanks, drums or container located at this facility.

11. Housekeeping: All systems designed for spill collection/prevention should be inspected frequently to ensure proper operation and to prevent overtopping or system failure.

NA

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

At the time of inspection, there were no spills evident at this facility.

13. Naturally Occurring Radioactive Material (NORM): All generators submitting waste to a New Mexico Oil Conservation Division Permitted Commercial or Centralized 711 Waste Management Facility must include a Naturally Occurring Radioactive Material status declaration. The generator must declare that the waste was tested for Naturally Occurring Radioactive Material (NORM) and does not contain NORM at regulated levels pursuant to 20 NMAC 3.1 Subpart 1403.C and D.

Under the new 711 Waste Management Facility Permit all waste must be accompanied with a signed NORM declaration from the waste generator.

14. Application Requirements for Permit Under the New Rule 711: An application, Form C-137, for a permit renewal shall be filed in DUPLICATE with the Santa Fe Office of the Division and ONE COPY with the Hobbs OCD district office. The application shall comply with Division guidelines and shall include:

(a) The names and addresses of the applicant and all principal officers of the business if different from the applicant;

Please submit with C-137 application.

(b) A plat and topographic map showing the location of the facility in relation to governmental surveys (1/4 1/4 section , township, and range), highways or roads giving access to the facility site, watercourses, water sources, and dwellings within one (1) mile of the site;

This is already on file with the OCD.

(c) The names and addresses of the surface owners of the real property on which the management facility is sited and surface owners of the real property of record within one mile of the site;

This is already on file with the OCD.

(d) A description of the facility with a diagram indicating location of fences and cattle guards, and detailed construction/installation diagrams of any pits, liner, dikes, piping, sprayers, and tanks on the facility;

Please submit an updated facility map that shows all current and discontinued status landfarm cells, the gravel pit (see picture 7), rubble piles, rock piles (see picture 6), the fenced soil pile, and area of remediated hazardous waste dump (see pictures 1 and 2).

(e) A plan for management of approved wastes;

Please submit with C-137 application.

(f) A contingency plan for reporting a cleanup of spills or releases;

Please submit with C-137 application.

(g) A routine inspection and maintenance plan to ensure permit compliance;

Please submit with C-137 application.

(h) A Hydrogen Sulfide (H_2S) Prevention and Contingency Plan to protect public health;

Please submit with C-137 application.

(i) A closure Plan including a cost estimate sufficient to close the facility to protect public health and the environment; said estimate to be based upon the use of equipment normally available to a third party contractor;

Please submit with C-137 application.

(j) Geological/hydrological evidence, including depth to and quality of groundwater beneath the site, demonstrating that disposal of oil field wastes will not adversely impact fresh water;

This is already on file with the OCD.

(l) Certification by an authorized representative of the applicant that information submitted in the application is true, accurate and complete to the best of the applicant's knowledge.

Please submit with C-137 application.

ENVIROTECH #1 711 FACILITY INSPECTION (PHOTOS BY OCD)

PHOTO NO. 1 DATE: 06/10/97

PHOTO NO. 2 DATE:06/10/97

ENVIROTECH #1 711 FACILITY INSPECTION (PHOTOS BY OCD)

PHOTO NO. 3 DATE:06/10/97

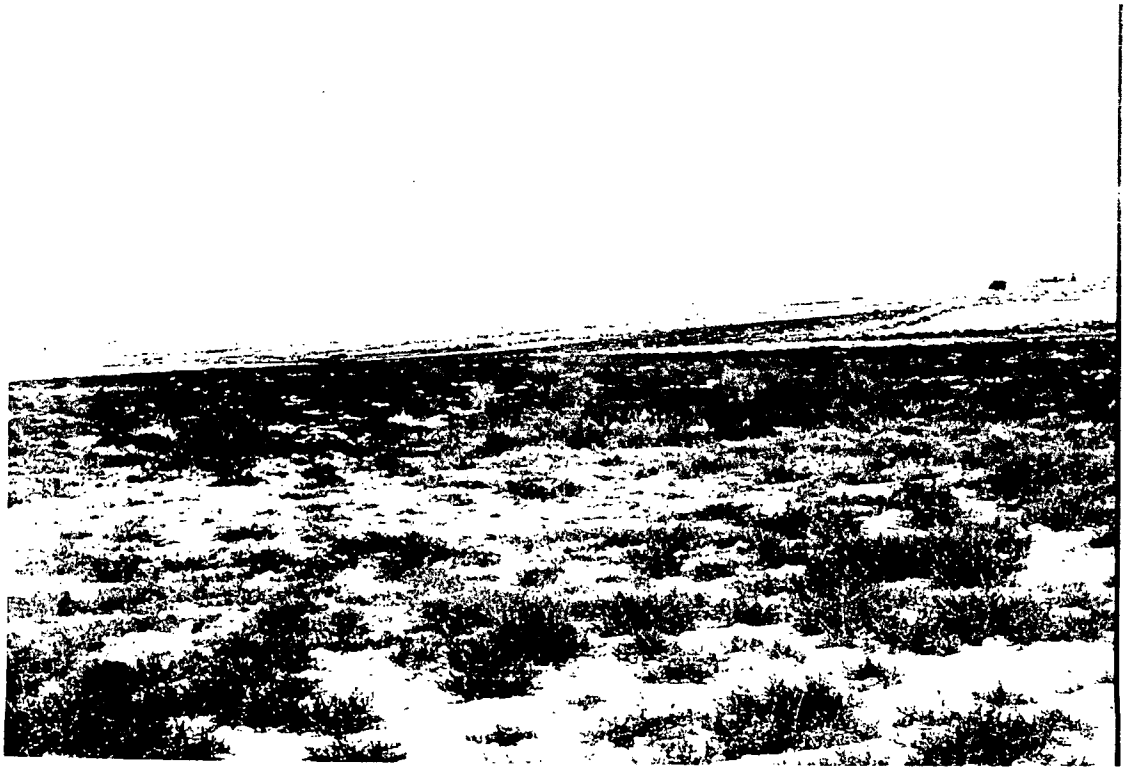


PHOTO NO. 4 DATE:06/10/97

ENVIROTECH #1 711 FACILITY INSPECTION (PHOTOS BY OCD)

PHOTO NO. 5 DATE:06/10/97

PHOTO NO. 6 DATE:06/10/97

ENVIROTECH #1 711 FACILITY INSPECTION (PHOTOS BY OCD)

PHOTO NO. 7 DATE:06/10/97

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 20, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO P-176-012-228

Mr Morris D. Young, President
Envirotech Inc.
5796 U.S. Highway 64 - 3014
Farmington, New Mexico 87401

Re: Landfarm No. 1
Envirotech Inc.
San Juan County, New Mexico

Dear Mr. Young:

Pursuant to Oil Conservation Division (OCD) Rule 711.A.(12), Envirotech Inc. is hereby ordered to cease operations at its Number 1 Landfarm located in the NE/4 SE/4 of Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico.

An investigation and accompanying excavation of an unpermitted landfill at the above-referenced location, which was initiated as a result of a citizen's complaint, revealed that unauthorized wastes were received and placed within the permitted facility. Below is a list of unauthorized wastes uncovered by Envirotech personnel at the permitted facility in the presence of an OCD inspector:

1	-drum with liquid hydrocarbon waste.
29	-drums with solid and semi-solid non-hydrocarbon waste.
Numerous	-gallon, quart and pint cans of apparently paint waste.
Numerous	-two ounce plastic touch-up paint vials.

Samples of the liquid and solid waste uncovered in the landfill were taken by both the OCD and the NM Environment Department in order to determine whether the waste will be classified as "hazardous waste".

The Envirotech Landfarm Number 1 will be closed and secured by the OCD. No person may enter the facility without the consent of the OCD and any person entering the facility may do so only in the presence of an OCD official. Envirotech will make arrangements with the OCD Aztec office to continue the required weekly disking of the soils on the landfarm.

Other requirements and conditions may be placed on Envirotech by the OCD based on the results of the laboratory analyses of the unauthorized wastes or due to other circumstances which require the protection of the public health and/or environment.

Please be advised that Envirotech Inc. may request a public hearing before the Oil Conservation Division to contest the closure of its Landfarm Number 1. In the event a public hearing is requested, this order will remain in effect pending a final ruling and order of the Division.

If you have any questions, please contact Roger Anderson at (505) 827-5812 or Rand Carroll, Division Counsel, at (505) 827-5805.

Sincerely:

William J. LeMay
Director

xc: Frank Chavez, OCD Aztec District Supervisor
Benito Garcia, Bureau Chief, NMED Hazardous & Radioactive Materials Bureau

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

M E M O R A N D U M :

TO: Envirotech file

THRU: Edward Horst, RCRA Insp./Enf. Program Manager
Coby Muckelroy, Insp./Enf. Supervisor

FROM: Michael Le Scouarnec, Haz. Waste Inspector

DATE: December 3, 1993

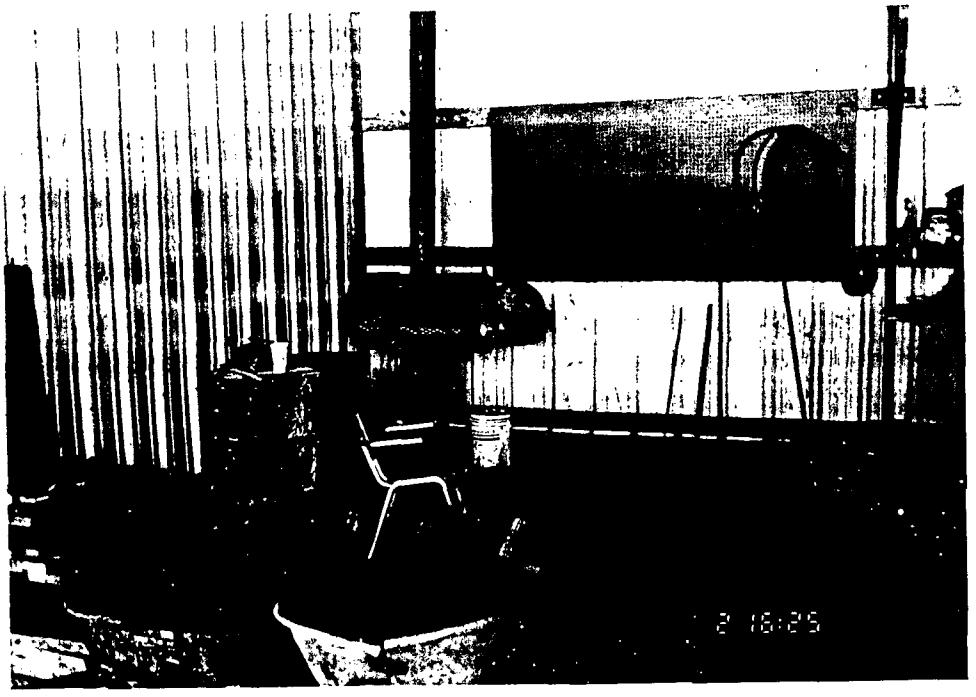
RE: Visit at Envirotech

On December 2, 1993, John Tymkowych and myself responded to a referral received by Ed Horst from the voluntary Fire Dept. regarding the burning of used oil filters at Envirotech. The incident involved the burning of the oil filters in as many as three 55 gallon drums. Mr. Morris Young stated that the burning happened once, and that he was not aware of that activity. Concerning a separate matter, Mr. Young showed us a wood burner where he burns used oil filters generated by his company and by his clients. Mr. Young stated that he collects used oil filters in the region. It is very likely that some of the filters are terne-plated (lead) due to the origin of the filters from heavy duty diesel equipment. The inspectors requested a TCLP for metals for the ashes.

In the yard, four 55 gallon drums storing saturated sorbent materials and kitty litter saturated with oil were found. According to the owner, the oil comes from the oil field. Mr. Young told us that he believes that the kitty litter can go in the landfill.

Also, four 55 gallon drums storing diesel contaminated dirt from a spill were in the yard. The spill did not occur in oil fields, Mr. Young stated that Roger Anderson from OCD did not and would not give an okay for disposal at the landfarm, and that the drums were under the jurisdiction of HRMB. On the other hand, Mr. Young stated that Ed Horst told Mr. Young to dispose of these drums in the landfarm.

HRMB PHOTO SHEET



FACILITY: Envirotech

PHOTO #: 1

DATE: 12/2/93

LOCATION: Maintenance Shop, North side of main building

DESCRIPTION: Wood stove burning oil filters

VIOLATION:

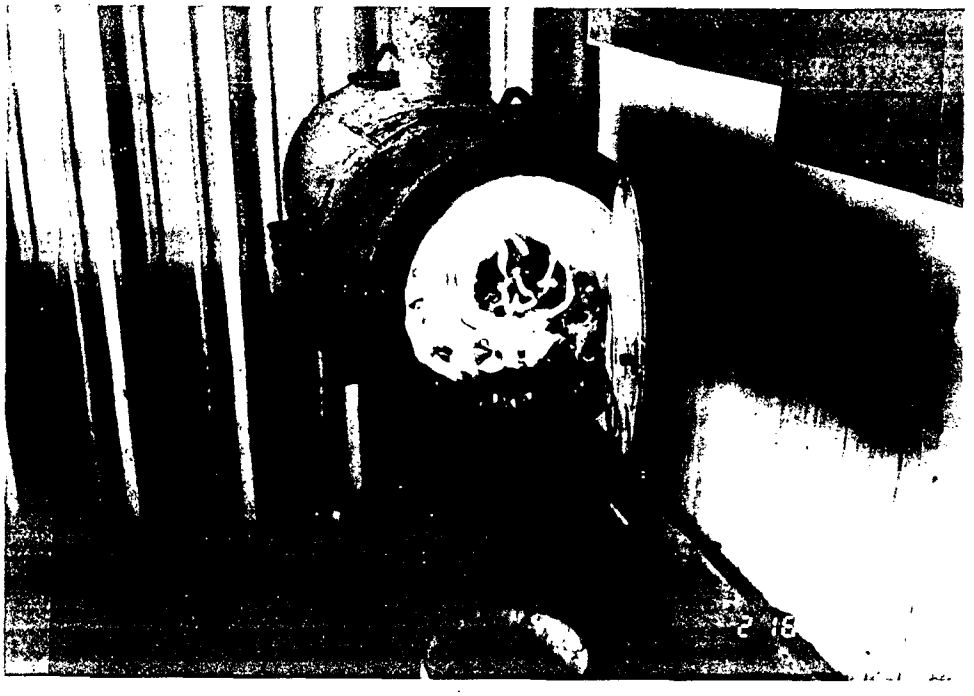


PHOTO #: 2

DATE: 12/2/93

LOCATION: Maintenance Shop, North side of main building

DESCRIPTION: Wood stove burning oil filters

VIOLATION:

HRMB PHOTO SHEET

FACILITY: Envirotech

PHOTO #: 3

DATE: 12/2/93

LOCATION: in Maintenance Shop, North side of Main building

DESCRIPTION: ashes w/water from stove.

VIOLATION:

PHOTO #: 4

DATE: 12/2/93

LOCATION: in yard center of yard North E of main building

DESCRIPTION: 2 x 55 gall. drum of burned oil filters.

VIOLATION:

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Bulding
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

M E M O R A N D U M:

TO: Roger Anderson, Oil Conservation Division Bureau Chief

THRU: Edward L. Horst, RCRA Program Manager
Coby G. Muckelroy, Insp. / Enf. Supervisor

FROM: Michael Le Scouarnec, Hazardous Waste Inspector

DATE: March 16, 1993

RE: Haz. Waste at Envirotech

On March 3, 1993, Coby Muckelroy and Michael Le Scouarnec from the HRMB accompanied by Kathy Brown from OCD visited land farm #1 at Envirotech located south of Bloomfield. The purpose of this memo is to provide OCD with duplicates of our pictures taken at the site.

HRMB PHOTO SHEET

FACILITY: Envivo tech

PHOTO #: 1

DATE: 3/3/93

LOCATION: Landfarm #1 South of Bloomfield

DESCRIPTION: Mr. Young & Mr. Glenn Riley inspecting 23X55gall. drm that carried the solid paint

VIOLATION:

PHOTO #: 2

DATE: 3/3/93

LOCATION: Landfarm #1 South of Bloomfield

DESCRIPTION: Mr. Youngesom, & Mr Glenn Riley

VIOLATION:

HRMB PHOTO SHEET

FACILITY: Envirotech

PHOTO #: 3

DATE: 3/3/93

LOCATION: Landfarm #1 South of Bloomfield

DESCRIPTION: Waste mixed with dirt (3 for 1). on plastic liner

VIOLATION:

PHOTO #: 4

DATE: 3/3/93

LOCATION: Landfarm #1 South of Bloomfield

DESCRIPTION: Mr. Glenn Riley taking picture of waste pile

VIOLATION:

HRMB PHOTO SHEET

FACILITY: EnVivoTech

PHOTO #: 5

DATE: 3/3/93

LOCATION: Land farm #1
South of Bloomfield

DESCRIPTION: Waste
pile & Mr. Young,
Kathy Brown & staff
Virgendert & waste
3 for 1

VIOLATION: _____

PHOTO #: _____

DATE: _____

LOCATION: _____

DESCRIPTION: _____

VIOLATION: _____

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

M E M O R A N D U M

TO: ROGER C. ANDERSON, Environmental Bureau Chief
Oil Conservation Division

FROM: KATHY M. BROWN, Geologist
Oil Conservation Division

SUBJECT: AUDIT OF ENVIROTECH LANDFARM

DATE: MARCH 12, 1993

On March 10 and 11, 1993, Kathy Brown and Chris Eustice of the Environmental Bureau of the New Mexico Oil Conservation Division (OCD) conducted an audit of Envirotech Landfarm No. 1 and No. 2. The audit consisted of a thorough review of every load of material received at the landfarms. The file for each job was retrieved and the following items were determined:

1. Was the material RCRA Subtitle C exempt or nonexempt?
2. If exempt was their a certification from the generator?
3. If nonexempt was a TCLP conducted?
4. If nonexempt was their OCD or NMED authorization?

After determining the above information, we went to the landfarms and physically walked each of the cells to correlate the contaminated soils with the file investigation.

The audit revealed no violations or unauthorized activities besides some minor misfiling or missing accessory paperwork.

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

MEMORANDUM

TO: ROGER C. ANDERSON, Environmental Bureau Chief
Oil Conservation Division

FROM: KATHY M. BROWN, Geologist KMB
Oil Conservation Division

SUBJECT: HAZARDOUS WASTE INSPECTION OF ENVIROTECH LANDFARM

DATE: MARCH 4, 1993

On March 3, 1993, I accompanied Coby Muchelroy and Mike LeScouarnec, hazardous waste inspectors with the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau, on a multimedia inspection of Envirotech Landfarm. The following report summarizes the significant facts uncovered during the site inspection:

10:00 a.m.: Coby Muchelroy questioned Morris Young, owner of Envirotech, on facts surrounding Envirotech's transportation and disposal of painting wastes from Riley Industrial Service located in Farmington, New Mexico. Morris said he had taken the wastes because he believed them to be non-hazardous. He said that he called them soils in the "request for authorization" because all solids accepted at Envirotech are mixed with soils prior to landfarming and has been standard operating procedure. Coby explained that the waste was hazardous because the benzene level exceeds the regulatory standard and because paint wastes are a listed "F" hazardous waste. Morris stated that he had overlooked the benzene level in the analysis, but as far as being a listed waste he had no idea that paint waste was listed and he doubted that Denny Foust did. Denny Foust is the OCD Aztec Environmental Geologist who authorized Envirotech to take the waste on January 6, 1993. Morris stated that he did not know about the high benzene

level until yesterday, March 2, 1993, when Frank Chavez (OCD Aztec District Supervisor) called Morris and asked him to check several analyses, Riley's being one of those. Frank then asked Morris if the levels were ppm or ppb and at that time Morris said he was first aware of the high level of benzene since the units were in ppm. Coby then called Glen Riley and asked him to come over to discuss proper disposal of the hazardous waste. Glen said he was bringing 2 Safety-Kleen personnel to discuss disposal.

1:30 p.m.: Glen Riley brought Greg Beall and Charlie Guyer with Safety-Kleen to discuss disposal. Greg said that they would transport the waste in accordance with hazardous waste manifesting and shipping requirements and that the wastes would probably go to their Denton Texas facility (a permitted "TSDF"). The quickest time that they could get the wastes there would be 2 weeks.

2:00 p.m.: All of the above people visited the landfarm to view the wastes. The landfarm supervisor was on site and said that originally there were 29 drums brought to the site on December 11, 1992. Today there were 23 empty drums in the receiving/holding area. The missing 6 drums had been removed to use as trash cans in various locations offsite. The 23 drums were empty and no residue was present. Coby said that for an "F" listed waste the drum that contained it is empty if it has less than 3% of the original contents or less than 1 inch of residue. If empty the drums can be disposed of in any manner (P wastes must have a triple rinse). Coby considered the 23 drums to be empty. The actual paint wastes were located in the holding area on plastic and had been mixed with clean overburden soil from the landfarm. The pile was mixed with 1 part paint waste to 3 parts soil. Morris stated that the paint waste had been emptied out of the drums maybe 2 to 3 weeks ago, but they were mixed with the soil and put on plastic only yesterday, March 2, 1992. Safety-Kleen took a sample of the waste. Coby said that the analysis they had of the liquid waste generated along with this solid waste was sufficient for NMED.

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

OIL CONSERVATION DIVISION
RECEIVED
'91 SEP 12 AM 9 16

September 9, 1991

Mr. Roger Anderson, Environmental Engineer
State of New Mexico
Oil Conservation Division
PO Box 2088
Santa Fe, New Mexico 87504

RE: Contaminated Soil Analysis
Envirotech Soil Remediation Site

Dear Mr. Anderson:

Envirotech has sampled the soil previously placed on the original Soil Remediation Site in October - November of 1990. This soil was from the Thriftway and Caribou 4-Corners Refinery Sites.

Grid C-11 was sampled as sample A, and Grid C-8 was sampled as sample B, as per the attached Chain of Custody.

Sample A is in the center-east-half of the proposed Bio-Remediation Test Cell area and sample B was from the center-west-half of the Bio-Remediation Test Cell area.

Both samples were non-detectable when tested by USEPA method 8015-modified.

We have started construction of the Bio-Remediation Test cell and should have it fully operation al within 30-45 days.

We appreciate your help and assistance.

Sincerely,

Morris D. Young

Morris D. Young
President

704.doc

Attachments

ENVIROTECH INC.
ENVIRONMENTAL SCIENTISTS

5796 U.S. HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS

Client: Envirotech Inc.
Project Name: Soil Remediation Site
Sample ID: BioRemediation Area
Laboratory Number: 081691006-a
Sample Matrix: Soil
Temperature: Received on Ice
Analysis Method: 8015 Modified

Report Date: 8-27-91
Date Sampled: 8-16-91
Date Received: 8-19-91
Date Extracted: 8-19-91
Date Analyzed: 8-19-91

Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Recoverable Petroleum Hydrocarbons	ND	1.0

Method: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA, 1978.Extraction by Method 3550, SW-846, USEPA, 1986.

Modified Method 8015, Petroleum Hydrocarbons, Total Recoverable, Gas Chromatography. Test methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, USEPA, 1990. Extraction by Method 3550, SW-846, USEPA, 1990.

ND - Analyte not detected at the stated detection limit.

Comments:

Analyst

Review

ENVIROTECH INC.
ENVIRONMENTAL SCIENTISTS

5796 U.S. HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS

Client: Envirotech Inc.
Project Name: Soil Remediation Site
Sample ID: BioRemediation Area
Laboratory Number: 081691006-b
Sample Matrix: Soil
Temperature: Received on Ice
Analysis Method: 8015 Modified

Report Date: 8-27-91
Date Sampled: 8-16-91
Date Received: 8-19-91
Date Extracted: 8-19-91
Date Analyzed: 8-19-91

Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Recoverable Petroleum Hydrocarbons	ND	1.0

Method: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA, 1978.Extraction by Method 3550, SW-846, USEPA, 1986.

Modified Method 8015, Petroleum Hydrocarbons, Total Recoverable, Gas Chromatography. Test methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, USEPA, 1990. Extraction by Method 3550, SW-846, USEPA, 1990.

ND - Analyte not detected at the stated detection limit.

Comments:

Michael L. Carr
Analyst

Review

ENVIROTECH INC.
ENVIRONMENTAL SCIENTISTS

5796 U.S. HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS

Client: Envirotech Inc.
Project Name: Soil Remediation Site
Sample ID: BioRemediation Area
Laboratory Number: 081691006-b Duplicate
Sample Matrix: Soil
Temperature: Received on Ice
Analysis Method: 8015 Modified

Report Date: 8-27-91
Date Sampled: 8-16-91
Date Received: 8-19-91
Date Extracted: 8-19-91
Date Analyzed: 8-19-91

Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Recoverable Petroleum Hydrocarbons	ND	1.0

Method: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA, 1978.Extraction by Method 3550, SW-846, USEPA, 1986.

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ND - Analyte not detected at the stated detection limit.

Comments:

Analyst

Review

CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location	ANAYLSIS/PARAMETERS
Envirotech Soil Remed. Sit	Bio Remediation area Hilltop New Mexico	
Sampler: (Signature) Mervin D. Young	Chain of Custody Tape No.	

Sample No/ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix	TPH Modified 8015							Remarks
Sample A	8/16/91	10:10 AM	081691006-a	grid C-11 Soil	✓							need TPH in PPM
Sample B-1	8/16/91	10:15 AM	081691006-b	grid C-8 Soil	✓							
Sample B-2	8/16/91	10:15 AM	081691006-b (duplicate)	grid C-8 Soil	✓							

MXP 8-19-91

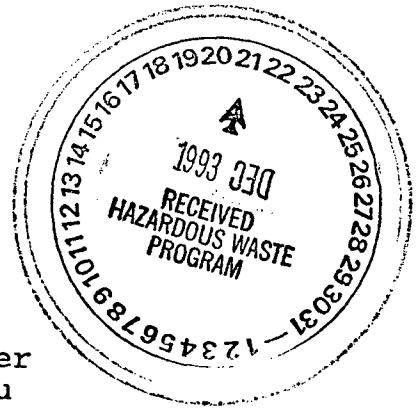
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Mervin D. Young	8/19/91	12:10 PM	Michael J. Eaves	8-19-91	1210
Relinquished by: (Signature)			Received by: (Signature)		
MXP					
Relinquished by: (Signature)	8-19-91		Received by: (Signature)		

ENVIROTECH Inc.
5796 US HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
(505) 632-0615

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615



December 16, 1993

Mr. Edward L. Hourst
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Hourst,

In the normal course of business Envirotech Inc. generates used oil and oil filters from our equipment and truck maintenance. As previously discussed with you, EPA regulations encourage recycling of this waste material rather than disposal at the county landfills.

We have purchased and installed a commercially designed used oil forced air heater for our maintenance shop area that works very well in heating the interior of the shop. This allows us to use most of our used oil. The excess oil is shipped to D & D Oil for recycling. We also have designed and constructed a forced draft heater that uses the oil filter elements for fuel. This provides heat for a maintenance area. The metal core and/or casing that remains from using the filter elements for fuel is then sent to Albuquerque Steel as steel scrap for recycling.

Attached please find laboratory analysis for the RCRA metals content of the filter ash. As per the analysis this ash is non-hazardous. We dispose of the ash at the San Juan County Landfill.

We feel this process exceeds the requirement of 40 CFR 261.4 Chapter 1, which requires only the draining of filter elements prior to disposal.

Subsequently several of our oilfield service clients have requested we assist them in recycling their used oil and oil filters so that they don't have to send this material to the San Juan County Landfill where there is a potential for future liability.

The purpose of this writing is to make sure that out understanding of the EPA guidelines coincides with the Hazardous and Radioactive Materials Bureau policy in handling this waste disposal problem in the best possible manner.

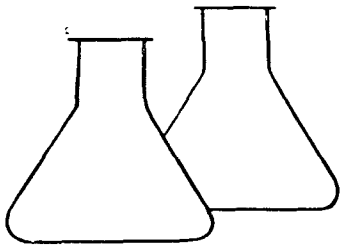
We realize that EPA is currently in the process of promulgating regulations for this disposal problem and look forward to having some definitive guidance in this area.

Your assistance is greatly appreciated.

Sincerely,

Morris D. Young

Morris D. Young
MDY/cj2071



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TRACE METAL ANALYSIS

Client:	Envirotech	Project #:	91005
Sample ID:	POI Filter Residue	Date Reported:	12-10-93
Laboratory Number:	6602	Date Sampled:	12-03-93
Sample Matrix:	Ash	Date Received:	12-03-93
Preservative:	Cool	Date Analyzed:	12-10-93
Condition:	Cool & Intact	Analysis Needed:	Trace metals

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
ARSENIC	ND	0.0001
BARIUM	45.5	0.01
CADMIUM	0.385	0.0001
CHROMIUM	4.59	0.0001
LEAD	3.18	0.0001
MERCURY	ND	0.0002
SELENIUM	ND	0.0001
SILVER	ND	0.0001

Method: Methods 3010A, 3020A, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA 1992

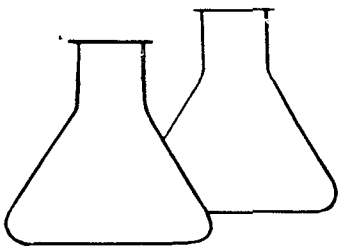
Methods 7060A, 7080, 7131, 7191, 7470, 7421, 7740, 7760A Analysis of Metals by GFAA and FLAA, SW-846, USEPA 1992

ND - Parameter not detected at the stated detection limit.

Comments:

Analyst

Review



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TRACE METAL ANALYSIS - BLANKS

Client:	NA	Project #:	NA
Sample ID:	Blanks	Date Reported:	12-10-93
Laboratory Number:	NA	Date Sampled:	NA
Sample Matrix:	Soil	Date Received:	NA
Preservative:	Cool	Date Analyzed:	12-10-93
Condition:	NA	Analysis Needed:	Trace Metals

Parameter	Instrument Blank (mg/Kg)	Method Blank (mg/Kg)	Det. Limit (mg/Kg)
ARSENIC	ND	ND	0.0001
BARIUM	ND	ND	0.01
CADMIUM	ND	ND	0.0001
CHROMIUM	ND	ND	0.0001
LEAD	ND	ND	0.0001
MERCURY	ND	ND	0.0002
SELENIUM	ND	ND	0.0001
SILVER	ND	ND	0.0001

Method: Methods 3010A, 3020A, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, Sept. 1992

Methods 7060A, 7080, 7131, 7191, 7470, 7421, 7740, 7760A Analysis of Metals by GFAA and FLAA, SW-846, USEPA, 1992

ND - Parameter not detected at the stated detection limit.

Comments:

Analyst

Review

ENVIROTECH LABS

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PHONE: (505) 632-0615 • FAX: (505) 632-1865

QUALITY ASSURANCE REPORT

TRACE METAL ANALYSIS - MATRIX SPIKE

Client:	NA	Project #:	NA
Sample ID:	NA	Date Reported:	12-10-93
Laboratory Number:	NA	Date Sampled:	NA
Sample Matrix:	Soil	Date Received:	NA
Analysis Requested:	Trace Metals	Date Analyzed:	12-10-93
Condition:	NA	Date Extracted:	NA

Parameter	Spike Added (mg/Kg)	Sample Result (mg/Kg)	Spiked Sample Result (mg/Kg)	Percent Recovery
ARSENIC	0.100	ND	0.0945	95
BARIUM	10.00	0.45	10.3	99
CADMIUM	0.100	0.0114	0.111	100
CHROMIUM	0.100	0.0010	0.0975	97
LEAD	0.100	0.0480	0.151	103
MERCURY	0.050	0.0015	0.0522	101
SELENIUM	0.100	ND	0.0967	97
SILVER	1.000	ND	0.979	98

QA ACCEPTANCE CRITERIA:

Parameter	Acceptance Range %
Trace Metals	80 - 120

Method: Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, July 1992.

Methods 7060, 7080, 7131, 7191, 7470, 7421, 7740, 7760A Analysis of Metals by GFAA and FLAA, SW-846, USEPA

ND - Parameter not detected at the stated detection limit.

Comments:

Analyst

Review

3235

CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location
Envirotech	Envirotech Yard

Sampler: (Signature)	Chain of Custody Tape No.
Allan Vaz	91005

Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix	No. of Containers	ANALYSIS/PARAMETERS: Total TCLP Metals						Remarks
P01 Filter Residue	12-3-93	0740	6602	Ash	1	✓						

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Allan Vaz	12-3-93	0745	Alan L. Adams	12-3-93	0745
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

ENVIROTECH INC.
5796 U.S. Highway 64-3014
Farmington, New Mexico 87401
(505) 632-0615

80918 - R2271 (RUN 03/26/93) PREQUALIFICATION EVALUATION - BRANCH INDUSTRIAL SERVICES PAGE 1
PROJECT: PREQUALIFICATION GENERATOR SURVEY COMPLETED: 03/26/93
BRANCH/TERRITORY: 700801 REVISED: 03/26/93
ALBUQUERQUE

A C C E P T

safety-kleen

A C C E P T

FLUID RECOVERY SERVICES
RILEY INDUSTRIAL SERVICES INC
PAINT WASTE/DIRT

CONTROL #: 0000171758-6
LAB #: 0000063296-4
SURVEY #: 0000278752

CUSTOMER INFORMATION: 7008-01-9110

FEDERAL EPA ID:
STATE EPA ID:

RILEY INDUSTRIAL
2615 SAN JUAN BLVD
FARMINGTON NM 87499

ATTN: GLEN RILEY

BRANCH: 700801 - ALBUQUERQUE

GENERATOR: RILEY INDUSTRIAL SERVICES INC
NATURE OF BUSINESS: INDUSTRIAL S.I.C. NO:
FEDERAL EPA ID: NMD161754296 IL: MO: ST: ID: STATUS: SQG
FACILITY ADDRESS: FOR MANIFEST BILLING: FOR MANIFEST
2615 SAN JUAN BLVD PO BOX 2014
FARMINGTON NM 87401 FARMINGTON NM 87499
GENERAL DESCRIPTION: PAINT WASTE/DIRT
PROCESS DESCRIPTION: PAINT GUN CLEANR WASTE
GENERATION AMOUNT: 150 DRUMS FOR ONE TIME ONLY
AMOUNT ON HAND: 150 IN DRUMS
SHIPPING FREQUENCY: ONE TIME ONLY IN DRUMS
COLOR: GREEN & BROWN PCT SOLIDS NOT SAMPLED: PH RANGE: 4-10
LAYERS OR PHASES: TWO PHYSICAL STATE: SOLID VISCOSITY: LOW

MATERIAL COMPOSITION: VOL%	CODE	MAX	TYPICAL
DIRT	D		90.00
(PAINT WASTE MEK)			10.00
TRACE AMOUNTS OF XYLENE			

ATTACHMENTS: NONE
RESTRICTED SUBSTANCES: NONE
HAZARD CLASS: NUMBER: NEED ASSISTANCE
EPA WASTE DESCRIPTION AND TREATMENT STANDARDS: RCRA HAZARDOUS WASTE: YES

LISTED EPA WASTE CODES: F005
TECHNOLOGY BASED LDR STANDARD: YES INCIN
P.O. NO: TYPE OF SAMPLE: COMPOSITE # OF DRUMS SAMPLED: 1 TAKEN BY: SK REP
NAME: GLEN RILEY TITLE: VP 03/03/1993 (505) 327-4947

CORPORATE REVIEWS:	DISPOSITION	REVIEWER	DATE
TECHNICAL:	ACCEPT	AAD	03/25/93
REGULATORY:	ACCEPT	JHP	03/25/93
OPERATING:	ACCEPT	JWH	03/25/93

POSSIBLE FACILITIES: 658 654 618 000161 TS209H
PRICING CODE:
PART NUMBER: 82108
WASTE,UNPROCESSABLE

APPROVED FACILITIES:

SAFETY-KLEEN CORP	SAFETY-KLEEN CORP	SAFETY-KLEEN CORP
STATE HWY 146	633 EAST 138TH ST	1722 COOPER CREEK ROAD
NEW CASTLE KY 40050	DOLTON IL 60419	DENTON TX 76208
FED EPA#: KYD053348108	ILD980613913	TXD077603371
STATE EPA#:	0310690006	65124
TELEPHONE: 502/845-2453	708/849-4850	817/383-2611
STATE CODE:	000161	OUTS209H

EPA WASTE CODES
F005 D035 F003
D007 D008

APPROVD 0001154 DRUM OR BULK
DOT-EPA RQ WASTE PAINT RELATED MATERIAL
DESC. 3 UN1263 PG III
(F005)(ERG#26)
COMMENTS: TWC IS OUTS209H. MUST BE INCINERATED DUE TO NEW BIF REGS.

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

MATERIAL ANALYSIS

BRANCH/SUBMITTER: 700801
RALPH ONDATJE

COMPLETED: 03/26/93
REVISED: 03/26/93

A C C E P T
FLUID RECOVERY SERVICES
RILEY INDUSTRIAL SERVICES IN
PAINT WASTE/DIRT

A C C E P T

CONTROL #: 0171758-6
SURVEY #: 278752

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR	: BROWN LT GREEN
NON-VOLATILE RESIDUE:	95.7 WT% DESCRIPTION: SOLID
FLAMMABILITY	: NO FLASH AT 142 F BY SETAFLASH
FLAMMABILITY	: NO FLASH AT 75 F BY SETAFLASH
PH	: EXTRACT BY METER 8.1
RADIOACTIVITY	: NONE DETECTED

COMMENTS: CHUNKS POWDER BULK DENSITY

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT:		1500 BTU/LB	ASH UPON COMBUSTION:		80.2 WT%
TOTAL FLUORINE	F :	1.0 WT%	TOTAL SULFUR	S :	0.2 WT%
TOTAL BROMINE	BR: <	0.1 WT%	TOTAL CHLORINE	CL: <	0.1 WT%

METALS CONTENT OF TOTAL SAMPLE (PPM): DIGEST BY: ICP

BARIUM (D005)	BA:	1816	CHROMIUM (D007)	CR:	450	COPPER		CU:	48
IRON	FE:	22076	MAGNESIUM	MG:	7313	NICKEL		NI:	54
PHOSPHORUS	P :	247	LEAD (D008)	PB:	143	TITANIUM		TI:	9438
ZINC	ZN:	692	SILVER (D011)	AG: <	1	ARSENIC	(D004)	AS: <	10
BERYLLIUM	BE: <	2	CADMIUM (D006)	CD: <	3	MERCURY	(D009)	HG: <	10
SELENIUM (D010)	SE: <	20	THALLIUM	TL: <	30				

COMMENTS: HIGH BA,FE,MG,TI

GENERAL COMPOSITION:

	SPECIFIC GRAVITY	VISCOSITY (CENTIPOISE)	GENERAL COMPOSITION BY: APPEARANCE (VOL%)	TOTAL (WT %)
AQUEOUS PHASE (FREE WATER)			0.0	0.0
ORGANIC PHASE (FEEDSTOCK)			0.0	0.0
BOTTOM SLUDGE (SEMISOLIDS)			0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)			100.0	100.0
TOTAL	.900	> 50000 CPS	100.0	100.0

SPECIFIC COMPOSITION OF TOTAL SAMPLE

	COMPOSITION OF: TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT	0.0	0.0
NON-VOLATILE RESIDUE DESCRIPTION: SOLID	95.7	95.7
VOLATILE ORGANICS BY DIFFERENCE	4.3	4.3
TOTAL	100.0	100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT
DETECTION METHODS : FID, FID

COMPOUND NAME	CODE	CAS NUMBER	COMPOSITION OF: VOLATILE ORGANICS (WT%)	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
NO VOLATILE ORGANICS DETECTED (<0.1% EACH)	NONE	0-62-4	100.0	100.0	4.3
TOTAL			100.0	100.0	4.3

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%:

ALCOHOLS	ALIPHATIC HYDROCARBONS
AROMATIC HYDROCARBONS	CHLORINATED SOLVENTS
ESTERS	ETHERS
GLYCOL ETHERS	INHIBITORS
KETONES	NITROGEN COMPOUNDS

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: R
LEVEL: SEG CODE: RELEASED: 03/26/93
LAB REVIEWERS: JA JA ANALYZED: 03/25/93
LOW BTU, HIGH ASH. HIGH VISCOSITY.

TRACKING INFORMATION:

	DATE	FACILITY
SURVEY RECEIVED :	03/16/93	SK TECHNICAL CEN
SAMPLE RECEIVED :	03/12/93	
RESAMPLE SHIPPED :		
RESAMPLE RECEIVED:		

CONTINUED ON NEXT PAGE