GW - 221

PERMITS, RENEWALS, & MODS Application

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 8/27/10

or cash received on _____ in the amount of $ 100.00

from Enviroteck Inc

for GW-221

Submitted by: Lawrence Romero Date: 1/5/11

Submitted to ASD by: Karen Torres Date: 1/5/11

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, December 29, 2010 3:28 PM
To: 'myoung@envirotech-inc.com'
Cc: VonGonten, Glenn, EMNRD
Subject: GW-221, Envirotech Inc. D.P.

Mr. Young,

Good afternoon,

OCD has received your $100 filing fee for your renewal of GW-221 which expired on 11.16.10. OCD received your renewal application 08.16.10.

OCD has yet to review your application due to current litigation of all our discharge plan permits state wide. Therefore Envirotech shall operate on their previously approved permit until OCD initiate processing of renewal applications.

If you have any questions please feel free to contact me.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

envirotech

December 28, 2010

RECEIVED OCD

2010 DEC 29 P 12:48

Mr. Leonard Lowe, Environmental Engineer
Oil Conservation Division/EMNRD
1220 South Saint Francis Drive
Santa Fe, NM 87505

Phone (505) 476-3492
Fax (505) 476-3462

RE: Application fee payment.
Discharge Permit Application Public Notice
Envirotech, Inc.

Dear Mr. Lowe:

Sorry for the delay in sending this. The letter was misplaced and found just today.

Enclosed please find a check for the $100.00 application fee.

Enclosed please find the Public Notice for Envirotech, Inc. for renewal of Discharge Permit GW221, in both English and Spanish as requested.

After you have approved this Public Notice it will be placed in the Farmington Daily Times of Farmington, New Mexico. The Daily Times is the primary newspaper in our Four Corners area with a circulation of 25,000 as of January 1, 2010. We will also place a notice in the local Post Office in Bloomfield, New Mexico.

Please feel free to contact me if you have further questions. We anticipate receiving your approval.

Thank you,
Envirotech, Inc.

Morris D. Young
President
myoung@envirotech-inc.com

Attachment

MDY/aep/LF/GW221 /publicnotice122810.doc

PUBLIC NOTICE

Envirotech, Inc. Morris D. Young, President, 5796 U.S. Hwy 64, Farmington, NM 87401, has submitted a renewal application for the previously approved discharge plan (GW-221) for the office and shop facilities located in the NE/4 of the NW/4 of Section 27, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately .5 miles east of the intersection of County Road 550 and Highway 64, Farmington, NM.

Envirotech Lab Facility: On-site disposal does not occur, with the exception of domestic sewage to a septic system and leach field. Distance to ground water is more than 100 feet. Approximately 825 gallons of non-hazardous liquid and solid lab waste is generated annually. Non-hazardous wastes are tested by RCRA approved analysis prior to appropriate disposal. Wastes shown by analysis to be hazardous are shipped off-site to a licensed hazardous waste disposal facility for disposal. All materials are stored in 55 gallon containers in lined containment.

Envirotech Maintenance Yard: Onsite disposal of wastes does not occur at this site with the exception of domestic sewage to a septic system and leach field. Distance to ground water is more than 100 feet. Approximately 1,000 gallons of used oil are generated at this site. The used oil is collected for recycling. Approximately 165 used oil filters are generated annually; these are collected and temporarily stored in containment vessels. Used oil filters are drained and stored in containment vessels until they are collected by a waste management service for disposal in a local landfill.

All other waste stream materials are stored in drums and tanks within bermed containment. Spills from these containers are not expected to impact surface or ground water. Soils contaminated from oil/fuel leaks on equipment are collected, subject to TCLP and RCRA characterization annually. Collected, sampled soils are placed on Envirotech's Soil Remediation Facility, Landfarm #2.

The discharge plan addresses how lab and maintenance product wastes will be properly handled, stored and disposed of, including how spills, leaks and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information; submit comments or request to be placed on a facility specific mailing list for future notices by contacting Leonard Lowe at the Oil Conservation Division/EMNRD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

NOTA PUBLICA

Envirotech Inc. Morris D Young, Presidente, 5796 US Hwy 64, Farmington, NM 87401, se ha sometido una applicación de la renovación para el plan previamente aprobado de la descarga (GW-221) par las facilidades de la oficina y la tienda localizo en el NE/4 del NW/4 de la Seccion 27, Municipio 29 al norte, la Gama 12 al oeste, NMPM, San Candado de Juan, Neuvo México, aproximadamente .5 millas al este del cruce del Camino de Condado 550 y la Carretera 64, Farmington, NM.

Envirotech Facilidad del Laboratorio:
En la disposición del sitio no occure, a excepcion del agua residual domestico a un sistema séptica y lixivia campo. La distancia para moler agua es mas de 100 pies. Aproximadamente 825 gallones de liquido no peligroso y desecho solido de laboratorio son engendrados anualmente. Los desechos no peligroso son probados por RCRA aprobo, en análisis antes de la disposición apropiada. Los desechos mostrados por el análisis para ser peligrosos son mandados el sitio semestralmente a un facilidad de la disposición para la disposición de basura peligroso licenciado del desccho. Todas materias son almacenadas en 55 contenedores de galones en forro la contención.

Envirotech Yarda de la Conservación:
En la disposición del sitio de deschos no occure ein este sitio a excepcion del agua residual domestico a un sistema séptica y lixivia campo. La distancia para moler agua es mas de 100 pies. Aproximadamente 1000 gallones del petroleo utilizado es engendrados en este sitio. El petroleo utilizado es reunido para reciclar. Aproximadamente 165 filtros de aceite utilizados son engendrados anualmente, estos son reunido y es almacenado temporalmente en naves de contención. Los filtros de aceite utilizados son desaguados y son almacenados en naves de contención hasta que ellos sean reunidos por un servicio del tratamiento de desechos para la disposición en un vertedero local. Todas las otras materias de la corriente del desechos son almacenados en tambores y tanques dentro de la contención de bermed. Rocia do estos contenedores no son esperados impresionar agua de superficie ni suelo. Las tierras contaminaron del petroleo/escapes do anualmente. Completo, probo tierras son colcados en la Facilidad del Refuerzo de Tierra de Envirotech, Landfarm #2. El plan de la descarga dirige como laboratorio y desechos de producto de conservación seran manejados apropriadamente, seran almacenados y seran desechos de, inclusive como rocia los comentarios o el pedido para ser colcado en una facilidad lista de envio especifica para notas futures contactando a Leonard Lowe en el Neuvo México OCD en 1220 S. del sur. Francis Maneja, Santa Fe, Neuvo México 87505, el telefono (505) 476-3492. El OCD aceptara los comentarios y las declaraciones del interes con respecto a la renovación y creara un facilidad lista de envio specifica para personas que desea recibir notas futures.

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

RECEIVED OCD
2010 AUG 16 A 11: 08

☐ New ☒ Renewal ☐ Modification

1. Type: Oilfield Service Company GW-221 4

2. Operator: Envirotech, Inc.

   Address: 5796 U.S. Hwy 64, Farmington, NM 87401

   Contact Person: Morris D. Young Phone: (505) 632-0615

3. Location: NE /4 NW /4 Section 27 Township 29N Range 12W
   Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

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

Name: Morris D. Young Title: President

Signature: Morris D. Young Date: August 12, 2010

E-mail Address: myoung@envirotech-inc.com

envirotech

August 12, 2010

Mr. Edward J. Hansen, Hydrologist
State of New Mexico Oil Conservation Bureau
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Phone (505) 476-3489
Fax (505) 476-3462

RE: Discharge Permit GW221 Renewal Application August, 2010
Envirotech, Inc.

Dear Mr. Hansen:

Attached please find a Discharge Permit GW221 Renewal Application for Oilfield Service Facilities that has been completed for Envirotech, Inc.

As the two (2) facilities are close in location, both are covered under the same application. However, each location will be submitting information individually. The main office is located at 5796 U.S. Highway 64 and the shop yard is located at 5726 U.S. Highway 64, both in Farmington, New Mexico.

ENVIROTECH MAIN OFFICE:

1. Oilfield Service Company

2. Envirotech, Inc.
5796 U.S. Highway 64, Farmington, New Mexico 87413
Contact person: Morris D. Young; Phone (505) 632-0615

3. NE/4 NW/4 Section 27, Township 29 North, Range 12 West. A 7.5 minute topographic map is attached.

4. Desert Sun Investment, Inc. is the land owner. Desert Sun Investment Inc. is wholly owned by Morris and Vicki Young. Desert Sun's address is 24 CR 5150, Bloomfield, New Mexico 87413. Phone (505) 632-2658.

5. Site is located approximately 1500 yards east of the intersection of U.S. Highway 64 and County Road 350 in Farmington, New Mexico.

   An updated plat map showing property purchased in addition to the subject property is attached. All new buildings and storage areas are designated.

   Solid and liquid waste generated from our laboratory is currently stored in two (2) lidded roll top drum storage units at the western property boundary. When the waste fills the two (2) 55-gallon drums in use for storage, it is transferred to a

storage area north of the main office while awaiting disposal. The storage building, referred to as the "Decon Barn", is contained within the Envirotech, Inc. yard. A six (6) foot high, razor wire topped chain link fence completely encloses the yard. The decontamination area is also used for storing unused drums, which are kept separate from drums containing contaminated material.

The facility is fenced with six (6) foot high, razor wire topped chain link fence and has no pits. All access to the yard is controlled by the use of both automatic and manual gates opened with coded keypads and padlocks.

6. Description of all materials used or stored at the facility:
Hand soap
Paint and paint supplies. Various containers less than 20 gallons.
Sulfuric acid liquid. Stored in original plastic, estimated 3.5 liters in lab
Hydrochloric acid liquid. Original glass, estimated 2.5 liters in lab
Nitric acid liquid. Original glass, estimated 2.5 liters in lab
Acetic acid liquid. Original glass, estimated 12.5 liters in lab
Sodium hydroxide liquid. Original plastic, estimated 1 liter in lab
Alconox solid. Original container, estimated 20 lb in lab
Micro-90 liquid. Original plastic, estimated 1 quart in lab
No-Chromix liquid. Original glass, estimated .5 quart in lab
Freon 113 liquid. Original glass, estimated 4 liters in lab
Methylene Chloride liquid. Original glass, estimated 4 liters in lab
Hexane liquid. Original glass, estimated 8 liters in lab
Ispropanol liquid. Original glass, estimated 8 liters in lab
Methanol liquid. Original glass, estimated 16 liters in lab
n-propanol liquid. Original glass, estimated 4 liters in lab
Cyclohexane liquid. Original glass, estimated 4 liters in lab
Toluene liquid. Original glass, estimated 500 ml in lab

7. Lab waste, solid and liquid. Stored in drums with lid, less than a total of 100 gallons in lab containment area.

Soil/water samples containing Methylene Chloride, Freon or Methanol as solvent extraction residue. Various acids used in extraction and analysis from lab samples.

Oilfield waste, including possible mercury from decontaminating oilfield line drips, is stored in a locked building north of the main office in Envirotech's fenced yard. Testing is done to ascertain if the material is hazardous. Less than ten (10) pounds of mercury may be stored onsite until sent for recycling in appropriate containers. All stored materials are in DOT approved drums with lids that fasten securely. The drums are stored on secondary containment pans inside the Decon Barn which is constructed on a cement slab foundation.

There are no acids, caustics, detergents or soaps stored in this area.

8. All storage on site is in drums or smaller containers. On-site storage is in either original containers (unused products) or in other appropriate containers (used products). Unused laboratory products are stored in the lab in the original containers. Most products are stored in segregated fire-resistant cabinets (not vented) with built-in secondary containment. Lab waste is collected at point of use and stored in containers compatible with waste being stored. When full, lab containers are transferred into the roll top drum storage located in the yard, until such time as two (2) drums accumulate, then the marked drums are moved to the Decon Barn while awaiting to be transferred for disposal.

   There are no surface impoundments located on-site. There is no underground process piping. Facility is less than 30 years old. On-site disposal does not occur at this site, with the exception of domestic sewage to septic system and leach field.

   Lab solids and liquids are segregated into hazardous and non-hazardous (by listing). Non-hazardous wastes will go for disposal at an appropriate out-of-state landfill. Hazardous wastes, if any, are shipped off-site biannually to a licensed, permitted hazardous waste facility. Different facilities are used depending on price, availability and the disposition of the material being shipped. Approval from receiving facility is received prior to shipment.

9. The site has been modified to include additional property purchased adjacent to the previous site. The existing buildings and surrounding land were purchased by Desert Sun Investments, Inc. Desert Sun Investment Inc. is wholly owned by Morris and Vicki Young. A plat map of the entire property and added buildings is included.

10. Routine inspection: Lab supplies and waste are tracked closely on a daily basis. Decontamination material is tracked on a daily basis.

11. Contingency plan for reporting and cleanup of spills: All materials are stored in 55-gallon containers and spills from these containers are not expected to impact surface or ground water. Storage area is bermed and lined. Containers are inspected on a regular basis to prevent leaks related to corrosion.

    Spillage will be collected and placed into a container for continued storage. NMOCD will not be notified of spills less than reportable quantities. Any reportable quantities will be reported to the NMOCD pursuant to Rule 116 and WQCC Section 1203.

12. The San Juan River is located approximately 3900 feet south of the site. An unnamed dry wash is located approximately 1900 feet west of the site with a dry wash drainage ditch located approximately 75 feet east of the site. All streams in the vicinity flow to the San Juan River.

Water well locations are noted on the attached map. There are 61 wells located within a one (1) mile radius of the site. These wells are located according to "Records of Water Wells and Springs prior to 1978", "Records of Water Wells in San Juan County 1978-1983", and "Listings of Point of Diversion for the San Juan Basin in New Mexico 2/7/92". There are no active water wells on any adjoining properties as the area is on City of Farmington water system.

Soil types are typically cobble filled sandy loams ranging from silty to clayey sands. Soils are typically moist, loose, non-cohesive, and have high permeability.

The aquifer below site is not named and is typically poorly graded medium sand with varying amounts of cobble and silt. Depth to ground water is estimated at greater than 100 feet below the ground surface. Depth to bedrock is anticipated in excess of 100 feet below the site. Flooding potential and run-off potential is very minimal; therefore, flood protection measures are not required. Due to thorough tracking of lab wastes, impact to either ground water or surface water is not probable.

13. Facility closure plan: Lab testing will cease and waste will not be generated. Any material in containers will be taken to an out-of-state landfill. Decontamination waste from oilfield equipment will cease and all material will be properly tested and disposed of in an appropriate manner. Spills above the reportable quantity will be reported pursuant to NMOCD rule 116 and WQCC section 1203. Envirotech's Soil Remediation Facility currently has an existing Discharge permit, and is not included in this application.

ENVIROTECH MAINTENANCE YARD:

1. Oilfield Service Company

2. Envirotech, Inc.
5796 U.S. Highway 64, Farmington, New Mexico 87413
Contact person: Morris D. Young; Phone (505) 632-0615

3. NE/4 NW/4 Section 28, Township 29 North, Range 12 West. A 7.5 minute topographic map is attached.

4. Mr. Ray Padilla is the land owner. Mr. Padilla's address is 1809 East Main, Farmington, New Mexico 87401. Phone (505) 325-0046.

5. Site is located approximately 100 yards west of the intersection of U.S. Highway 64 and County Road 5500 in Farmington, New Mexico.

A plat map of the subject property is attached, including location of the current tank and barrels at the facility.

The facility is fenced with four (4) strand barbed wire and there is one (1) bermed area enclosing a 4,000 gallon double walled convault fuel tank for red dyed diesel. The tank is encapsulated in a cement containment. Beyond the cement encapsulation the area is surrounded by an earthen berm capable of holding 1.33 times the volume of the tank.

6. Description of material used or stored at the facility:
Paint and paint supplies. Various containers less than 20 gallons stored in shop area.
Hand soap. Four (4) sixty-four (64) ounce pump containers.
Diesel, contained in double walled convault, 4000 gallon, cement containment.
Motor oil (new), up to 220 gallons in enclosed poly tote container.
Hydraulic fluids, up to 220 gallons in enclosed poly tote container.
Antifreeze, up to 220 gallons in enclosed poly tote container.
Solid grease for lubrication. Two (2) 15-gallon drums, two (2) 55-gallon drums and two (2) cases of grease cartridges at twelve (12) per case.
Anti-seize lubricant. Two (2) four (4) ounce cans.
Black RTV silicone. Two (2) four (4) ounce tubes.
Windex. Two (2) sixteen (16) ounce manual spray bottles.
Unleaded gasoline. Less than five (5) gallons in fuel container.
Brake cleaner. Up to six (6) cases of six (6) sixteen (16) ounce cans.
WD-40 aerosol. Three (3) sixteen (16) ounce cans.

7. Waste solids and effluent:
Used motor oil, up to 300 gallons. Used as fuel, excess is recycled.
Used filters, less than six (6).

8. Collection and Disposal:
Primarily storage on site is in 55-gallon drums or smaller containers. The exception is the storage of used oil, contained within an above-ground tank holding up to 300 gallons. The used oil tank area is contained in a lined containment capable of holding 1.33 times the volume of the tank. On-site storage is in either original containers (unused products) or in other appropriate containers (used products). Spent acid is stored in original battery until entire battery is picked up by a recycler, no formal approval needed. Filters are drained while hot, liquid goes into waste drum. Sixteen (16) filters per month are permitted at the landfill.

Soils contaminated from oil/fuel leaks on equipment are subject to TCLP and RCRA characterization annually. Collected, sampled soils are placed at Envirotech's Soil Remediation Facility, Landfarm #2, upon approval by NMOCD.

Most storage is inside of the building on the cement floor. There are no floor drains in the work area or storage area.

This facility is less than 30 years old and there is no underground process.

On-site disposal does not occur at this site, with the exception of domestic sewage to a septic system and leach field.

Off-site disposal is performed through recyclers. Used motor oil (in excess of four (4) drums) is picked up by D&D Oil of 115 Michigan Ave, Bloomfield, New Mexico. Used lead-acid batteries are turned in to Fleetpride at 1410 Murray Drive, Farmington, New Mexico, or Inland Kenworth at 3924 Bloomfield Hwy, Farmington, New Mexico when new batteries are delivered to the site. Both facilities dispatch their own trucks and personnel to collect material from the Maintenance Yard.

The trash is collected weekly by Waste Management of Four Corners, located at 101 Spruce Street, Farmington, New Mexico, for placement at the San Juan County Landfill. A maximum of four (4) oil filters per week are permitted for disposal through this method.

9. There are no proposed modifications to the site at this time.

10. The facility will be inspected monthly by management for leaks and spillage. A record of each inspection will be kept at the main office. Any reportable quantities will be reported to the NMOCD pursuant to Rule 116 and WQCC Section 1203.

Monitor wells are not located at this site.

Secondary containment for the used oil tank is provided by a 60 mil HDPE lined basin capable of holding 1.33 times the volume of the tank. This secondary containment has a hog wire fence around it.

11. Whereas all material is stored in secondary containment (as a minimum), spillage will be into contained areas. There is not any anticipated threat to surface or groundwater.

Spillage will be collected from its containment and placed into its container (or equivalent) for continued storage. NMOCD will not be notified of spills less than reportable quantities.

All containment is visually inspected from all sides, which makes a leak of quantity easily detectable. A monthly inspection by management and frequent use of the facility by employees ensures leaks are repaired with only minor spillage.

There is not an injection well at this site.

12. The San Juan River is located approximately 3900 feet south of the site. An unnamed dry wash is located approximately 1900 feet east of the site. All drainages in the vicinity flow to the San Juan River.

Water well locations are noted on the attached map. There are 61 wells located with in a one (1) mile radius of the site. These wells are located according to "Records of Water Wells and Springs prior to 1978", "Records of Water Wells in San Juan County 1978-1983", and "Listings of Point of Diversion for the San Juan Basin in New Mexico 2/7/92". There are no active water wells on any adjoining properties as the area is on City of Farmington water system.

Soil types are typically cobble filled sandy loams ranging from silty to clayey sands. Soils are typically moist, loose, non-cohesive, and have high permeability.

The aquifer below the site is not named and is typically poorly graded medium sand with varying amounts of cobble and silt. Depth to ground water is estimated at greater than 100 feet below the ground surface. Depth to bedrock is anticipated in excess of 100 feet below the site. Flooding potential and run-off potential is very minimal; therefore, flood protection measures are not needed. Due to thorough tracking of shop wastes, impact to either ground water or surface water is not probable.

13. Facility closure plan: Shop use will cease and waste will not be generated. All existing waste will be disposed of as specified previously. Spills above the reportable quantity will be reported pursuant to NMOCD rule 116 and WQCC section 1203. Envirotech Soil Remediation Facility has a currently existing Discharge permit, and is not included in this application.

Should you need any clarification of our responses, or have any comments, please contact me at (505) 632-0615.

Respectfully Submitted,
ENVIROTECH, INC.

Morris D. Young
President

PRE-DISPOSAL PROTOCOL

ENVIROTECH LABORATORY

Most of the analysis at Envirotech's Laboratory is performed on oil-field related wastes. These wastes include chlorides, metals, glycols and hydrocarbons. Oilfield samples are both exempt and non-exempt. A fraction of the samples tested are non-oilfield related hydrocarbon contaminated soils and fluids. Some soils and fluids may contain other industrial chemicals. All of these samples are tested for hazardous levels of contamination, before disposal. A TCLP excluding herbicides and pesticides is run on the waste to test for hazardous constituents.

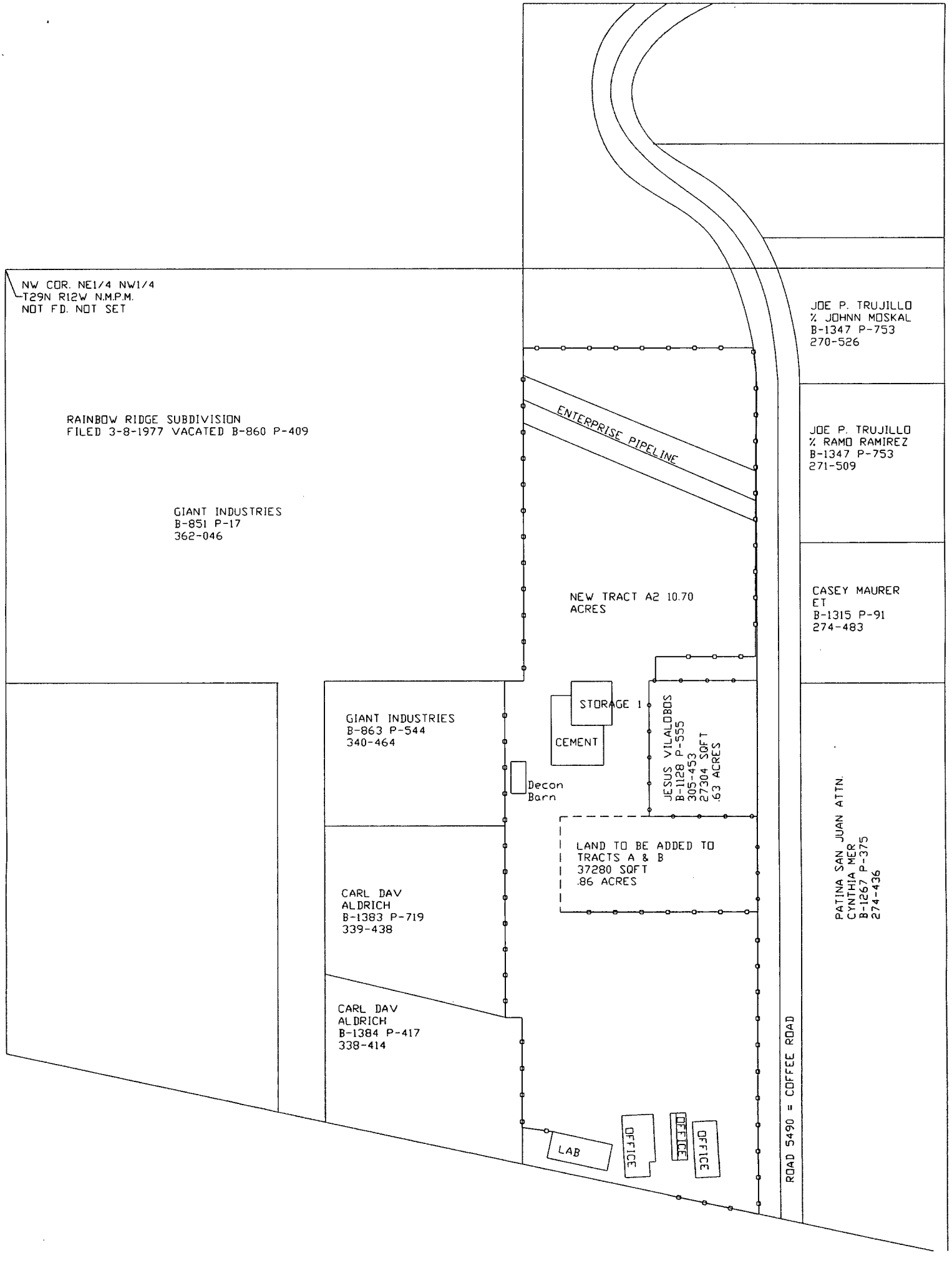
Protocol: The waste stream from the laboratory containing primarily hydrocarbon contaminated soils and sludges is stored in 55-gallon drums in a bermed, lined containment area. Approximately fifteen (15) barrels of waste are normal for an annual accumulation. When four (4) barrels are accumulated, these barrels are composite sampled for a TCLP excluding herbicides and pesticides prior to disposal at Bondad Landfill in Bondad, CO.

DECONTAMINATION BARN

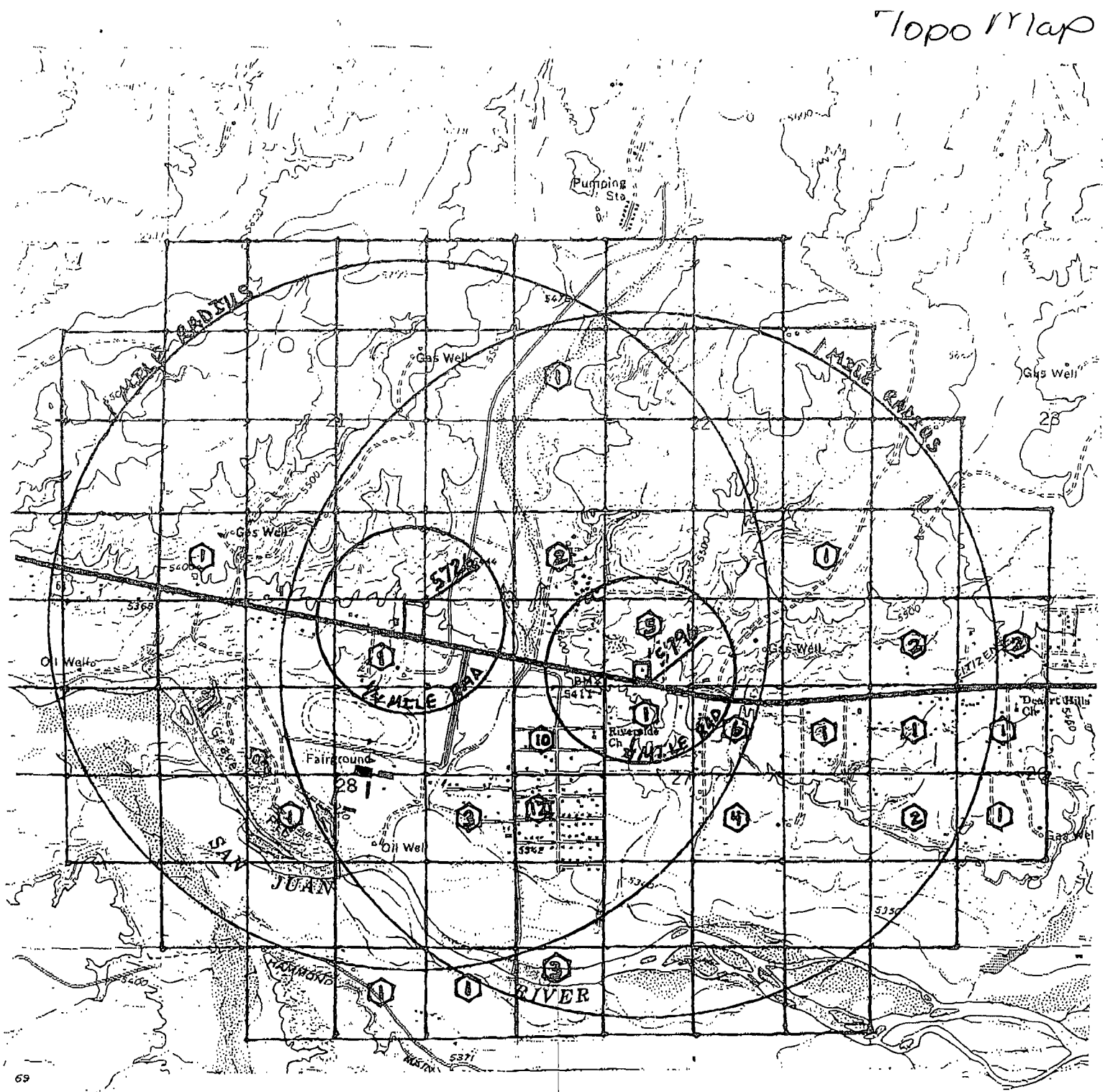
The decontamination done at the Decon Barn is performed on oil-field line drip equipment. The waste generated may have possible mercury contamination. This waste is considered to be non-exempt and is tested for hazardous levels of contamination prior to disposal. A RCRA 8 or TCLP metal is performed to determine waste constituents.

Protocol: If the waste is below standards the material is properly disposed of at Envirotech's Spill Remediation Facility, Landfarm #2, under NMOCD permit #NM-01-0011 with appropriate documentation. In the event the material is deemed to be non-acceptable, the appropriate disposal is set up and the material is promptly sent off-site to a licensed hazardous facility. Different facilities are used depending on price, availability and disposition of waste. Approval from the receiving facility is received prior to shipment.

If free mercury is present the material is immediately sent for recycling in appropriate containers provided by Waste Management Mercury Tracker.


NW COR. NE1/4 NW1/4
T29N R12W N.M.P.M.
NOT F.D. NOT SET
RAINBOW RIDGE SUBDIVISION
FILED 3-8-1977 VACATED B-860 P-409
GIANT INDUSTRIES
B-851 P-17
362-046
JOE P. TRUJILLO
% JOHNN MOSKAL
B-1347 P-753
270-526
JOE P. TRUJILLO
% RAMO RAMIREZ
B-1347 P-753
271-509
ENTERPRISE PIPELINE
NEW TRACT A2 10.70
ACRES
CASEY MAURER
ET
B-1315 P-91
274-483
GIANT INDUSTRIES
B-863 P-544
340-464
STORAGE 1
CEMENT
Decon
Barn
JESUS VILALOBOS
B-1128 P-555
305-453
27304 SQFT
.63 ACRES
LAND TO BE ADDED TO
TRACTS A & B
37280 SQFT
.86 ACRES
CARL DAV
ALDRICH
B-1383 P-719
339-438
CARL DAV
ALDRICH
B-1384 P-417
338-414
LAB
OFFICE
OFFICE
OFFICE
ROAD 5490 = COFFEE ROAD
PATINA SAN JUAN ATTN.
CYNTHIA MER
B-1267 P-375
274-436

Topo Map



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET
DOTTED LINES REPRESENT 10-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

NEW MEXICO
QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy-duty — Light-duty

Medium-duty — Unimproved dirt

State Route

U. S. Route

HORN CANYON, N. MEX.

N3637.5—W10800/7.5

1965
PHOTOREVISED 1979
DMA 4357 II NE—SERIES V881

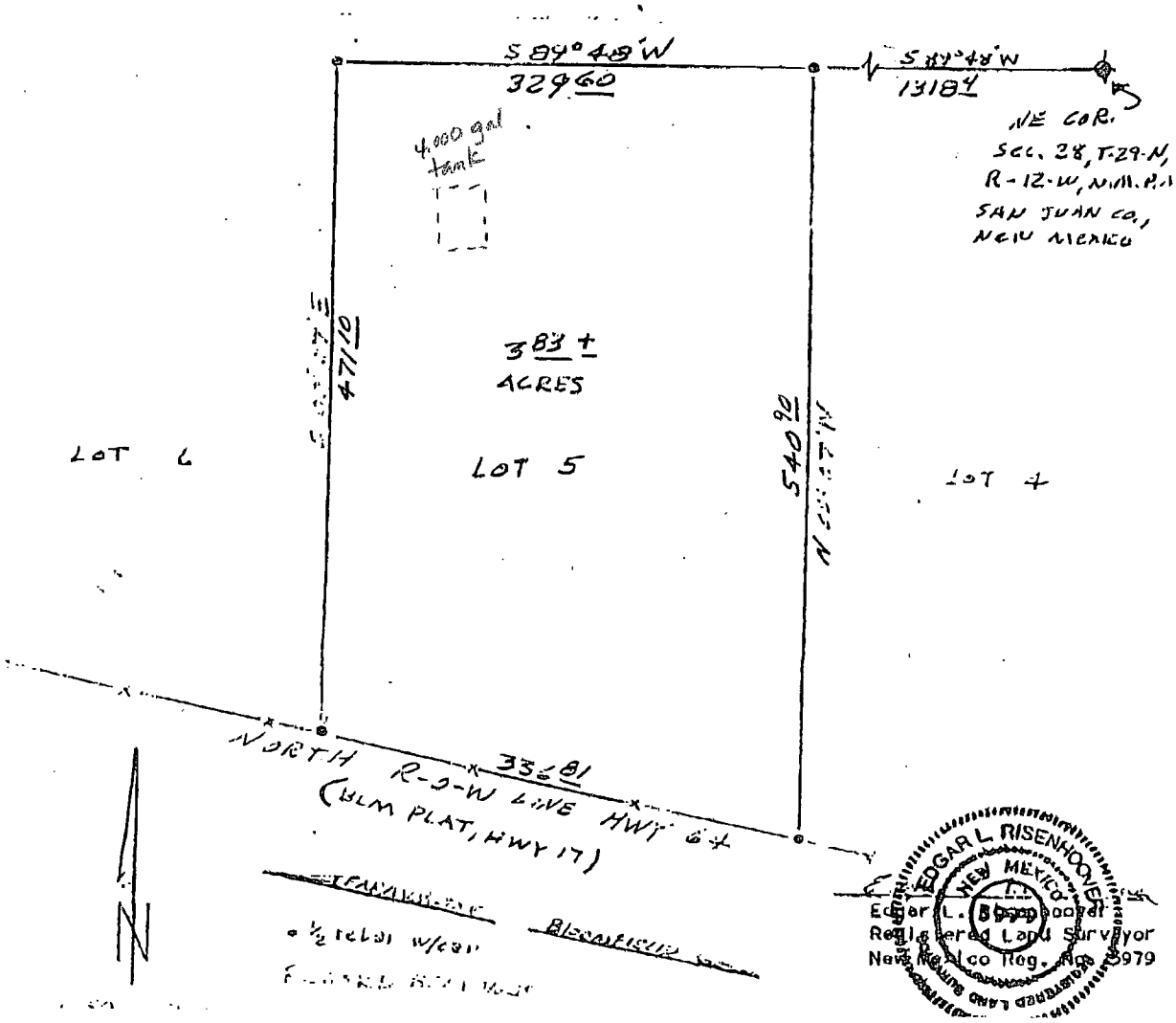
Envirotech Inc
Shop Area

Edgar L. Risenhoover

Registered Land Surveyor
New Mexico • Colorado • Arizona
Route 3, Box 105 A - 665 County Road 1191
Farmington, New Mexico 87401
Phone (505) 325-3904

PRAX TRUJILLO

Lot 5 of Section 28 in T-29-N, R-12-W, N.M.P.M., San Juan County, New Mexico, same being situated in the NW¼NE¼ of said Section 28, containing 3.83 acres, more or less, and subject to all right-of-ways, easements, restrictions and reservations of record or in existence.



envirotech

REVISED 2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401

SUBMITTED TO:

MR. BRAD JONES
NEW MEXICO OIL CONSERVATION DIVISION
1220 SOUTH SAINT FRANCIS DRIVE
SANTA FE, NEW MEXICO
(505) 476-3487

SUBMITTED BY:

ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401
(505) 632-0615

NOVEMBER 2009
PROJECT NO. 03143-0027

REVISED 2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401

TABLE OF CONTENTS

INTRODUCTION

Envirotech, Inc. proposes a minor modification to Discharge Permit GW221, based on the procedures presented below. Envirotech, Inc. owns and operates a New Mexico Oil Conservation Division (NMOCD) permitted oilfield service facility is located at 5796 U.S. Highway 64, Farmington, New Mexico; see ***Figure 1, Vicinity Map***. This workplan details procedures used to decontaminate oilfield equipment, specifically, meter-runs and line-drips, and procedures for remediating, recycling, disposing, and managing waste as a result of these activities; see ***Appendix A, Facility and Process Photography***.

LINE-DRIP/METER-RUN DECONTAMINATION AND WASTE MANAGEMENT PROCEDURES

The following procedures are used for decontamination of meter-runs, line-drips, and piping at Envirotech's NMOCD permitted oilfield service facility, and for analyzing, handling, storing, recycling, remediating, and disposing of waste.

NOTE: Free product is removed from line-drips and meter-runs, and returned to the production stream, prior to transport to Envirotech's facility. Additionally, the line-drips and meter-runs are plugged, and/or wrapped, as appropriate, prior to transport, to prevent releases.

1. Upon arrival at Envirotech's NMOCD permitted oilfield service facility, inspect line-drips and meter-runs to ensure any openings are plugged and/or wrapped, as appropriate, prior to unloading.

2. Unload the equipment into Envirotech's containment area, consisting of a 100' x 100' bermed area lined with durable thick poly liner. Once the line-drips/meter runs are unloaded, stabilize the equipment to ensure they remain in a stub-up position.

3. Inspect the meter-runs/line-drips for suspect asbestos containing material (ACM) and abate any suspect ACM in accordance with USEPA regulatory standards. Collect a sample of the suspect ACM for laboratory analysis. If a sample returns positive results for ACM, dispose of the ACM at a permitted disposal facility.

4. After removal of all suspect ACM, transport the line-drip/meter-run to the decontamination area. Place the equipment onto racks and secure using chains.

5. Prior to decontamination activities, complete a Job Safety Analysis (JSA) to identify potential hazards and to determine appropriate PPE.

6. Inspect the decontamination area to ensure the area is clean and free from unnecessary hazards. Construct a barrier to secure the area and to control traffic.

7. Don proper PPE including but not limited to, a respirator, a hard hat, steel toe shoes, gloves, and Tyvek suits.

8. Disassemble and/or cut the piping, as necessary.

9. Capture any free elemental mercury present in the equipment by either draining the mercury from the equipment, or by aspirating the mercury into a container. Log-in and store the free elemental mercury in the mercury storage facility.

10. An Environmental Scientist will then process the mercury for reclamation and recycling using Waste Management Lamp Tracker. The free elemental mercury is then ultimately transported to Mercury Waste Solution's retort facility to be purified and sold.

11. Apply the vapor suppressor to the inside of the meter-run/line drip to absorb hydrocarbons and to amalgamate any remaining free elemental mercury that cannot be recovered.

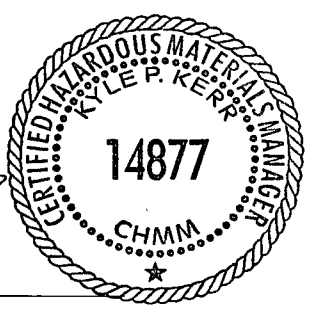
12. Clean out the line-drip/meter-run and piping using a squeegee, a wire brush, a scrubbing pad, and compressed air, as appropriate; see ***Appendix A, Facility and Process Photography***. When the soil and sludge have been removed, collect a sample and submit the sample to Envirotech's laboratory to be analyzed for TCLP Mercury.

13. Upon completion of decontamination activities, inspect all cleaning equipment and remove any traces of free elemental mercury using an aspirator and combine with any free elemental mercury recovered in Step 9.

14. When soil/sludge sample results are received, an Environmental Scientist will then process the waste for remediation at an NMOCD permitted remediation facility or disposal at a RCRA permitted retort facility, as appropriate, based on analytical results.

Submitted by:
ENVIROTECH, INC.

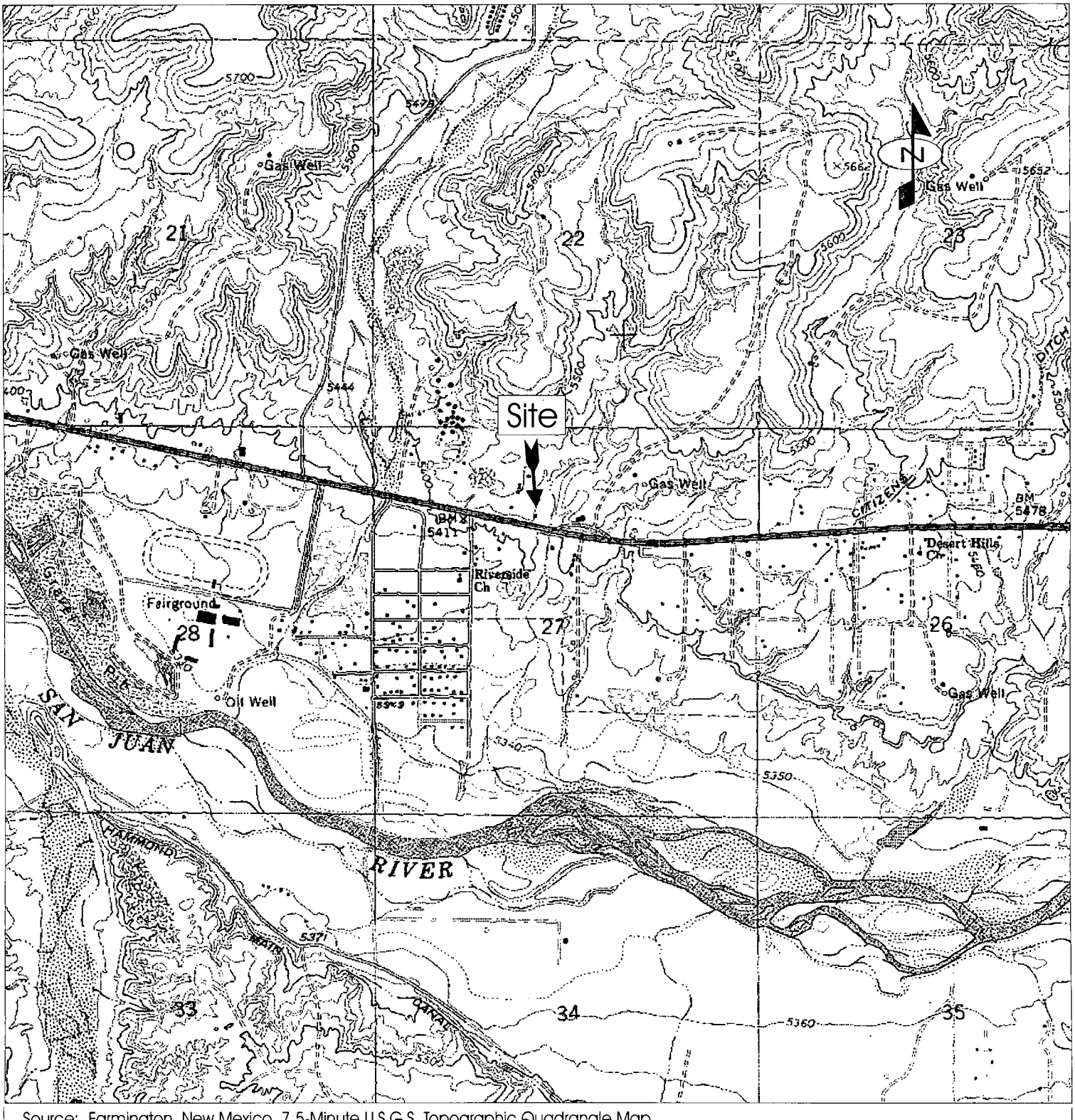
Reviewed by:



Sherry Auckland
Environmental Scientist
sauckland@envirotech-inc.com

Kyle P. Kerr, CHMM
Principal Scientist/Vice President
kpkerr@envirotech-inc.com

FIGURES



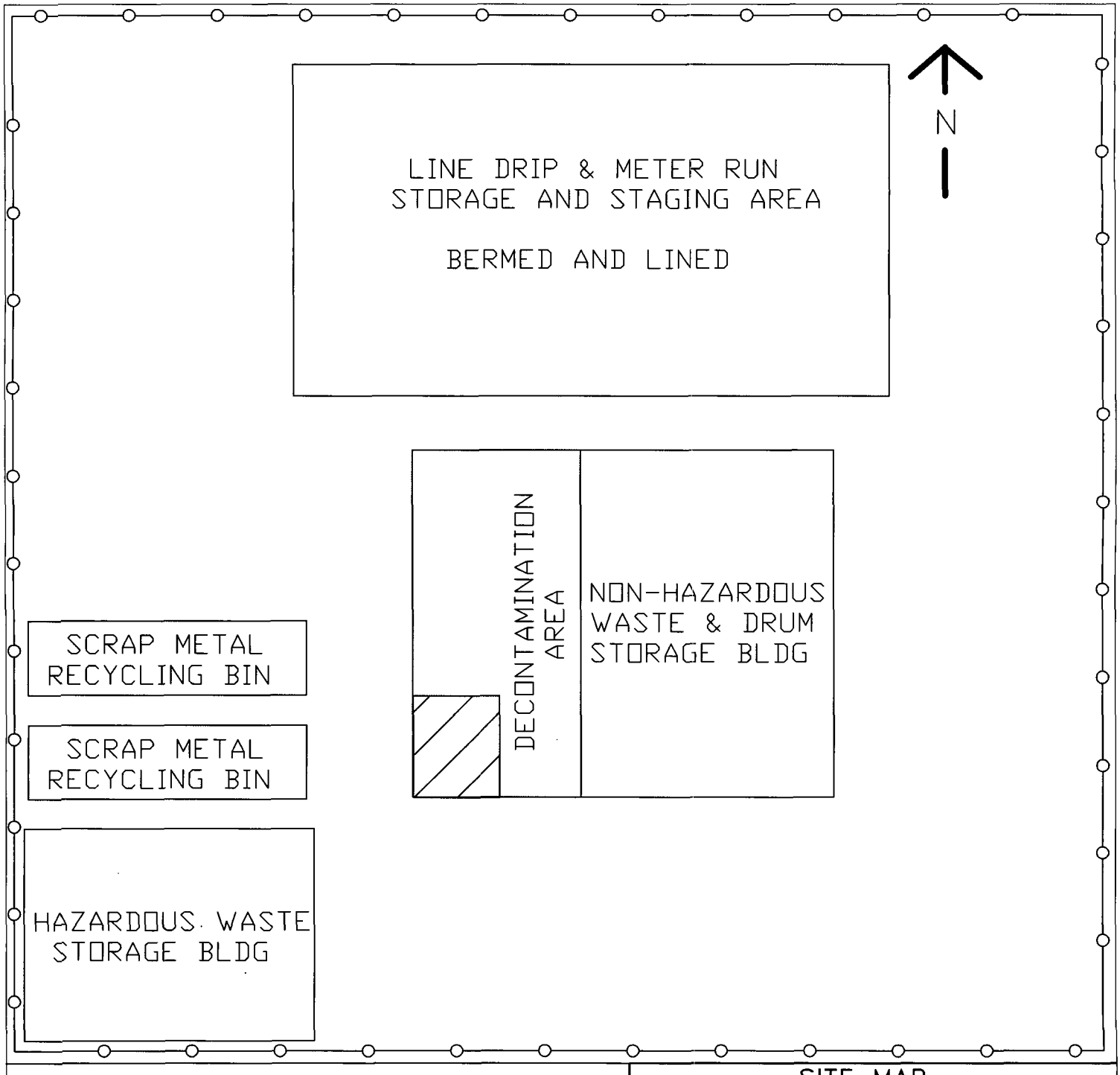
Source: Farmington, New Mexico, 7.5-Minute U.S.G.S. Topographic Quadrangle Map
Scale: 1:24,000 1" = 2000'

Envirotech, Inc.
5796 U.S. Highway 64
Farmington, New Mexico

Vicinity Map

Figure 1

Date Drawn: 08/07/09



LEGEND

PROPOSED FENCE LINE

CONTAINMENT AREA

SITE MAP
ENVIROTECH, INC.
DECONTAMINATION FACILITY
5796 HWY 516
FARMINGTON, NEW MEXICO

SCALE: NTS	FIGURE NO. 2	REV
PROJECT NO.		

REVISIONS

NO.	DATE	BY	DESCRIPTION

MAP DRWN	SLA	10/20/09	BASE DRWN		

ENVIRONMENTAL SCIENTISTS & ENGINEERS
ENVIROTECH
5796 U.S. HIGHWAY 64, FARMINGTON, NM 87401 505-632-0615

APPENDIX A

FACILITY AND PROCESS PHOTOGRAPHY

REVISED 2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
FACILITY AND PROCESS PHOTOGRAPHY

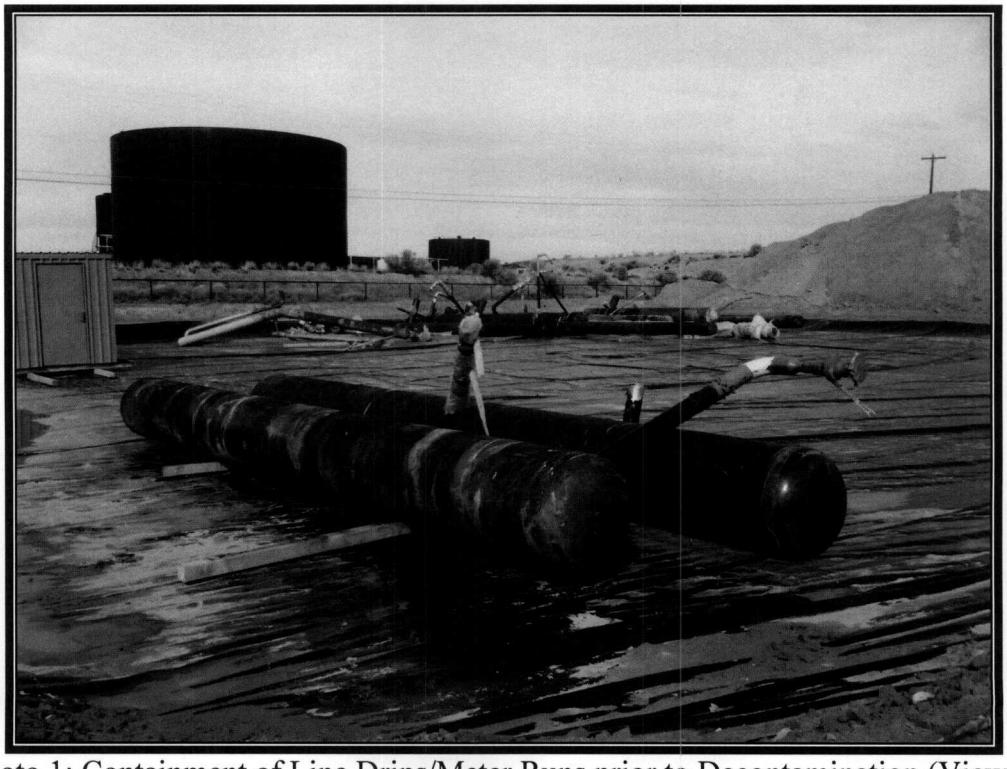


Photo 1: Containment of Line Drips/Meter Runs prior to Decontamination (View 1)

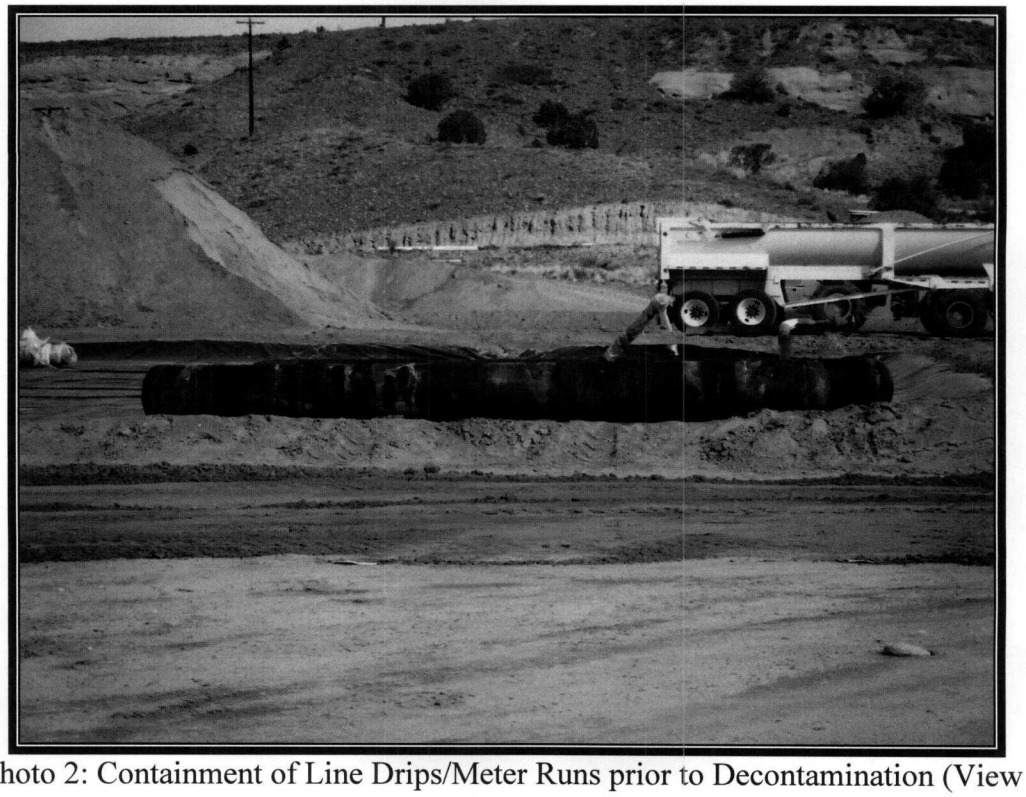


Photo 2: Containment of Line Drips/Meter Runs prior to Decontamination (View 2)

Photo 3: Envirotech, Inc. Employees Preparing to Cut Line Drip (View 1)

Photo 4: Envirotech, Inc. Employees Preparing to Cut Line Drip (View 2)

REVISED 2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
FACILITY AND PROCESS PHOTOGRAPHY

Photo 5: Line Drip Cutting Process

Photo 6: End Caps of Line Drip on Containment after Cutting

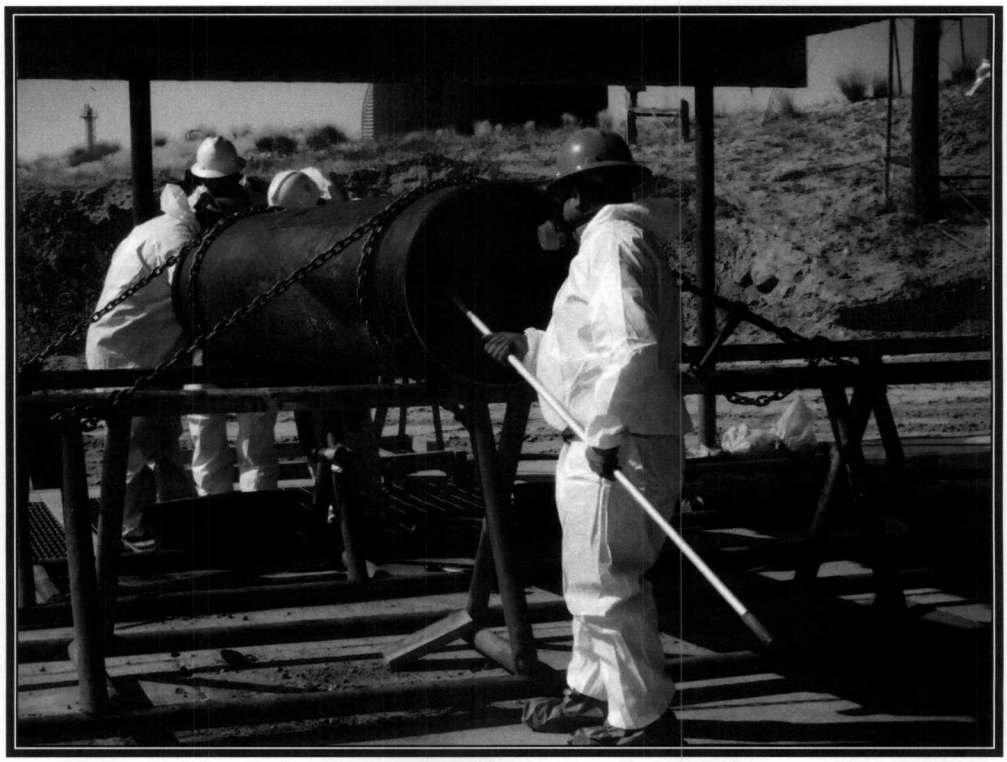


Photo 7: Line Drip Cleaning and Decontamination Process (View 1)

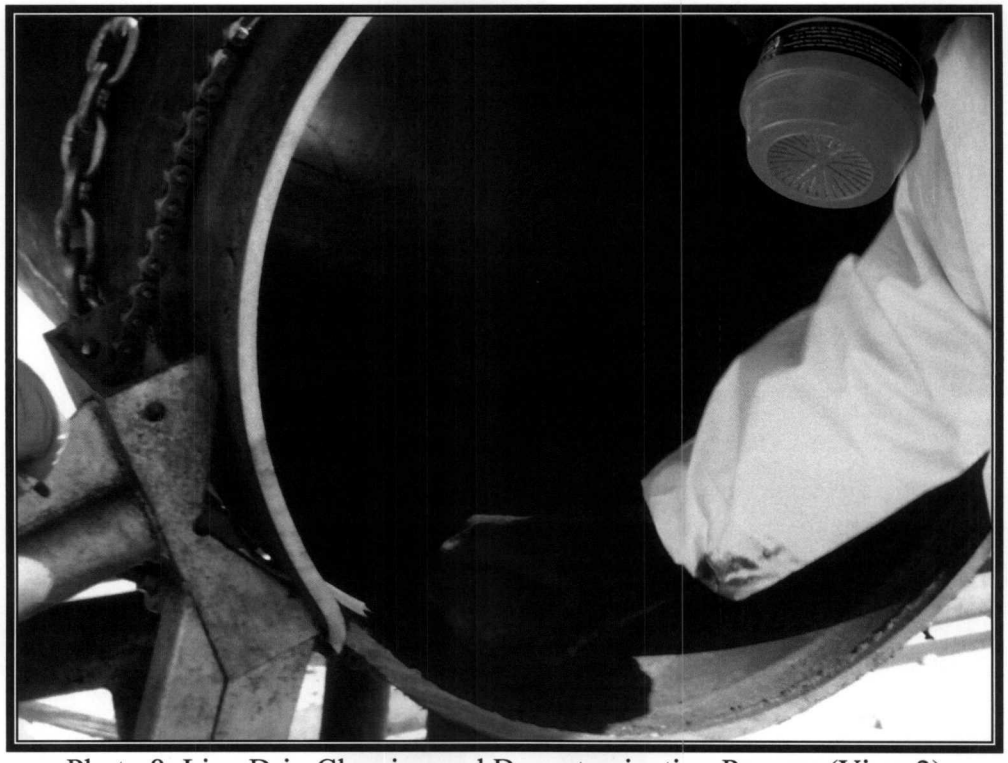


Photo 8: Line Drip Cleaning and Decontamination Process (View 2)

REVISED 2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
FACILITY AND PROCESS PHOTOGRAPHY

Photo 9: Scrap Metal Recycling Bins for Decontaminated Line Drips/Meter Runs

Photo 9: View of Waste Generated During Decontamination Process

Photo 10: View of Containment Area for Waste Generated During Decontamination

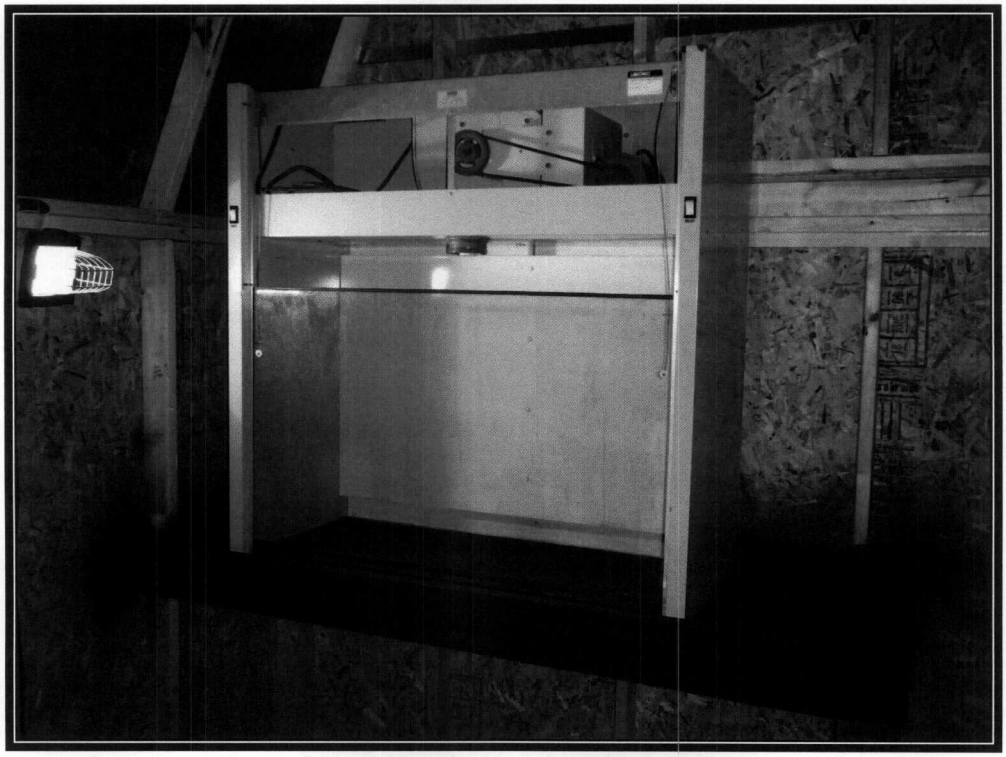


Photo 11: View of Vent Hood being installed for Mercury Filtering

envirotech

2009 WORKPLAN
MINOR MODIFICATION TO
DISCHARGE PERMIT GW221

STILL IN REVIEW AS
OF 09.09.09
HLOWE

FOR

ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401

PROJECT NO. 03143-0027

AUGUST 2009

5796 U.S. Highway 64, Farmington, NM 87401 Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 envirotech-inc.com

envirotech

August 12, 2009 Project No. 03143-0027

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505 Phone: (505) 476-3487

RE: 2009 WORK PLAN, MINOR MODIFICATION TO DISCHARGE PERMIT GW221, ENVIROTECH, INC.

Dear Mr. Jones,

Please find enclosed for your review and approval, *2009 Work Plan, Minor Modification to Discharge Permit GW221*, for Envirotech, Inc. located at 5796 U.S. Highway 64, Farmington, New Mexico.

If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted,
ENVIROTECH, INC.

Kyle P. Kerr, CHMM
Principal Scientist/VP

Enclosure: 2009 Work Plan

Cc: Project File No. 03143

2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221

SITE NAME:

ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401
(505) 632-0615

SUBMITTED TO:

MR. BRAD JONES
NEW MEXICO OIL CONSERVATION DIVISION
1220 SOUTH SAINT FRANCIS DRIVE
SANTA FE, NEW MEXICO
(505) 476-3487

SUBMITTED BY:

ENVIROTECH INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401
(505) 632-0615

AUGUST 2009

PROJECT NO. 03143-0027

2009 Workplan
Minor Modification To Discharge Permit GW221
Envirotech, Inc.
5796 U.S. Highway 64
Farmington, New Mexico 87401

Table of Contents

2009 WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
5796 U.S. HIGHWAY 64
FARMINGTON, NEW MEXICO 87401

INTRODUCTION

Envirotech, Inc. proposes a minor modification to Discharge Permit GW221. The facility is located at 5796 U.S. Highway 64, Farmington, New Mexico; see ***Figure 1, Vicinity Map***. This workplan details proposed activities specific to separation activities for mercury contaminated water generated as a result of line-drip decontamination activities, and proposed procedures for future decontamination activities.

BACKGROUND

Envirotech, Inc. owns and operates a New Mexico Oil Conservation Division (NMOCD) permitted oilfield service facility, where equipment cleanout activities, including asbestos abatement, are performed. This facility is located at 5796 U.S. Highway 64, Farmington, New Mexico. Recent decontamination activities involved the use of a high-pressure water sprayer to decontaminate line-drips and meter-runs. As a result of these activities, contaminated water has been generated and is stored on-site at the address above. Envirotech, Inc. plans to use a "reverse emulsion breaker" as a method to capture and recycle the free elemental mercury recovered.

Envirotech, Inc. no longer uses water for the decontamination of line-drips and meter-runs and proposes the methods described below. Envirotech, Inc. also plans to use the reverse emulsion breaker as a method to reclaim free product in the line-drip/meter-run prior to transport to Envirotech's decontamination facility. See ***Appendix A, Process Photography***, to view photographs of the procedures with captions explaining the actions taking place.

LINE-DRIP/METER-RUN DECONTAMINATION AND WASTE MANAGEMENT PROCEDURES

EXISTING MATERIAL

The following tasks describe the proposed procedures for reclamation of mercury, in the existing drums of mercury contaminated water, by aiding in the gravitation separation of emulsified water and oil using a reverse emulsion breaker.

1. The reverse emulsion breaker will be added to the water in accordance with the manufacturers' suggested application.

2. When separation has been achieved, the water and oil will be returned to the production process.

3. Free elemental mercury will be reclaimed and recycled using appropriate methods in accordance with applicable regulatory requirements.

4. Any remaining particulate matter or sludge will be sampled for TCLP Mercury. When sample results are received, the particulate matter or sludge will be disposed of or remediated in accordance with regulatory requirements.

FUTURE MATERIALS

The following tasks describe the proposed field procedures for field assessment and meter-run/line-drip disassembly, suspect asbestos containing material (ACM) abatement if necessary, and the methods for reclamation of mercury in the product remaining in line-drips and meter-runs prior to transport to Envirotech's NMOCD permitted oilfield service facility, and the proposed procedures for analyzing and managing waste.

1. Once the line-drip/meter-run piping is disconnected, Envirotech, Inc. will assess the line-drip/meter-run for the presence of free product and suspect ACM.

2. If any free product is present in the line-drip/meter-run, the reverse emulsion breaker will be added to the product in accordance with the manufacturers' suggested application. If suspect ACM is present, the suspect ACM will be sampled, abated, and disposed of in accordance with USEPA regulatory standards.

3. When separation has been achieved using the reverse emulsion breaker, the free product will then be pumped out of the line-drip or drained out of the meter run and returned to the production process.

4. After the removal of all free product, the line-drip/meter-run and piping will be transported to Envirotech's NMOCD permitted oilfield service facility, in accordance with New Mexico Department of Transportation regulatory guidelines.

5. During decontamination activities, free elemental mercury will be reclaimed and recycled using appropriate methods in accordance with applicable regulatory requirements.

6. The soil and/or sludge in the line-drip/meter-run and piping will be treated by applying absorbent material which will absorb hydrocarbons and aid in reclaiming any remaining free elemental mercury for recycling.

7. The line-drip/meter-run and piping will then be cleaned using a squeegee and compressed air. When the soil and sludge have been removed, a sample will be collected and analyzed in Envirotech's laboratory for TCLP Mercury.

8. When sample results are received, the soil will be disposed of or remediated in accordance with regulatory requirements.

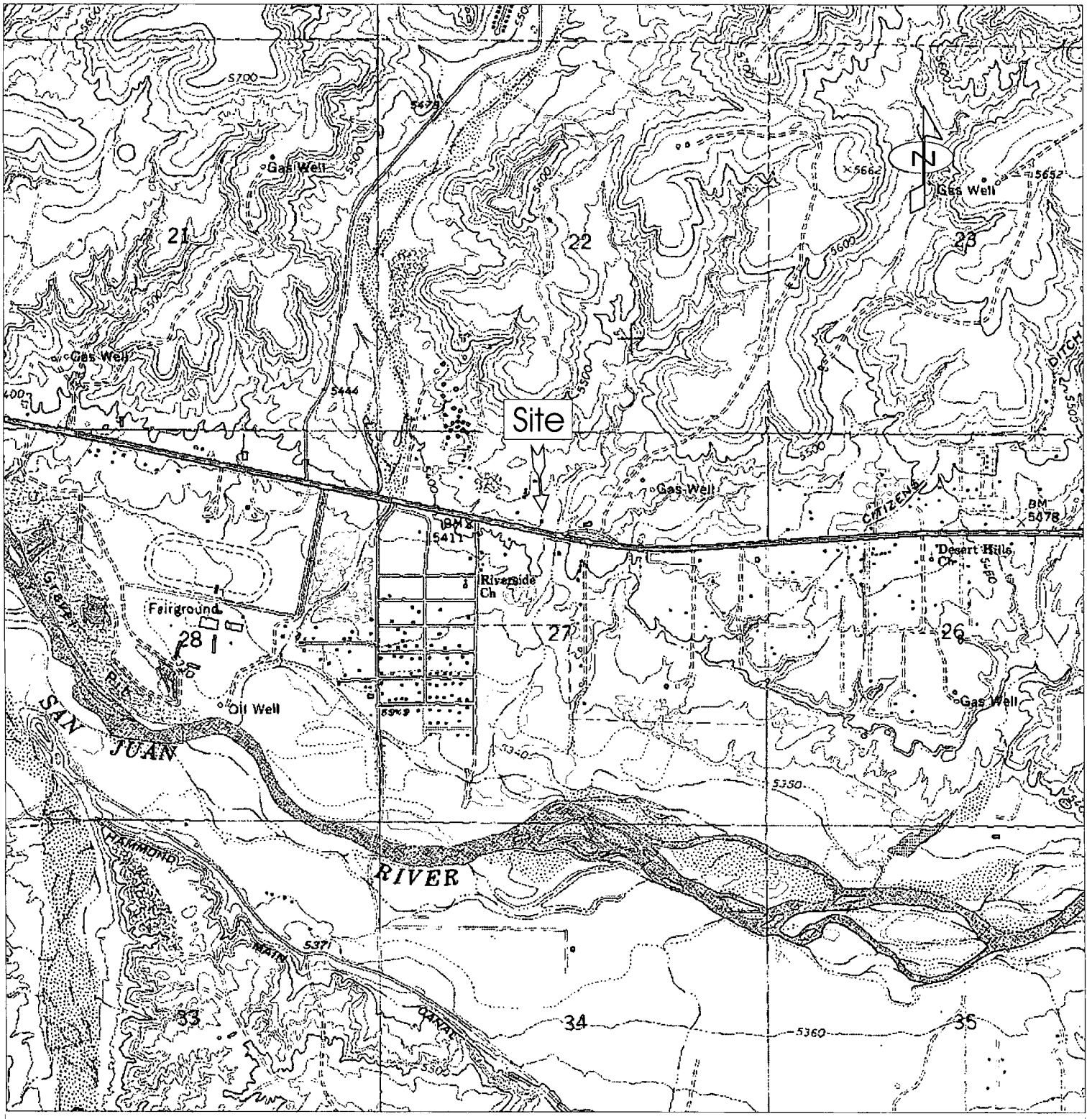
Submitted by:
ENVIROTECH, INC.

Reviewed by:

Sherry Auckland
Environmental Scientist
sauckland@envirotech-inc.com

Kyle P. Kerr, CHMM
Principal Scientist/VP
kpkerr@envirotech-inc.com

FIGURES



Source: Farmington, New Mexico, 7.5-Minute U.S.G.S. Topographic Quadrangle Map
Scale: 1:24,000 1" = 2000'

Envirotech, Inc.
5796 U.S. Highway 64
Farmington, New Mexico

Vicinity Map

Figure 1

Date Drawn: 08/07/09

APPENDIX A

PROCESS PHOTOGRAPHY

2009WORKPLAN
MINOR MODIFICATION TO DISCHARGE PERMIT GW221
ENVIROTECH, INC.
METER RUN/LINE DRIP FIELD PROCESSES

Photo 1: View of Meter-Run and Meter-House

Photo 2: Meter Run Disassembly (View 1)

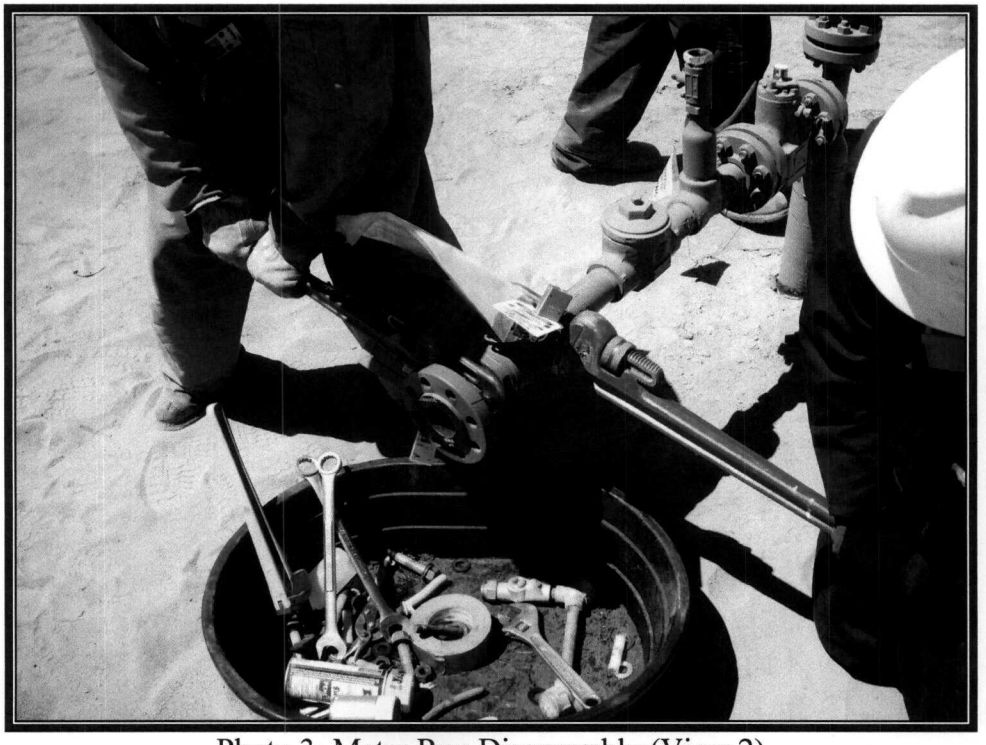


Photo 3: Meter Run Disassembly (View 2)

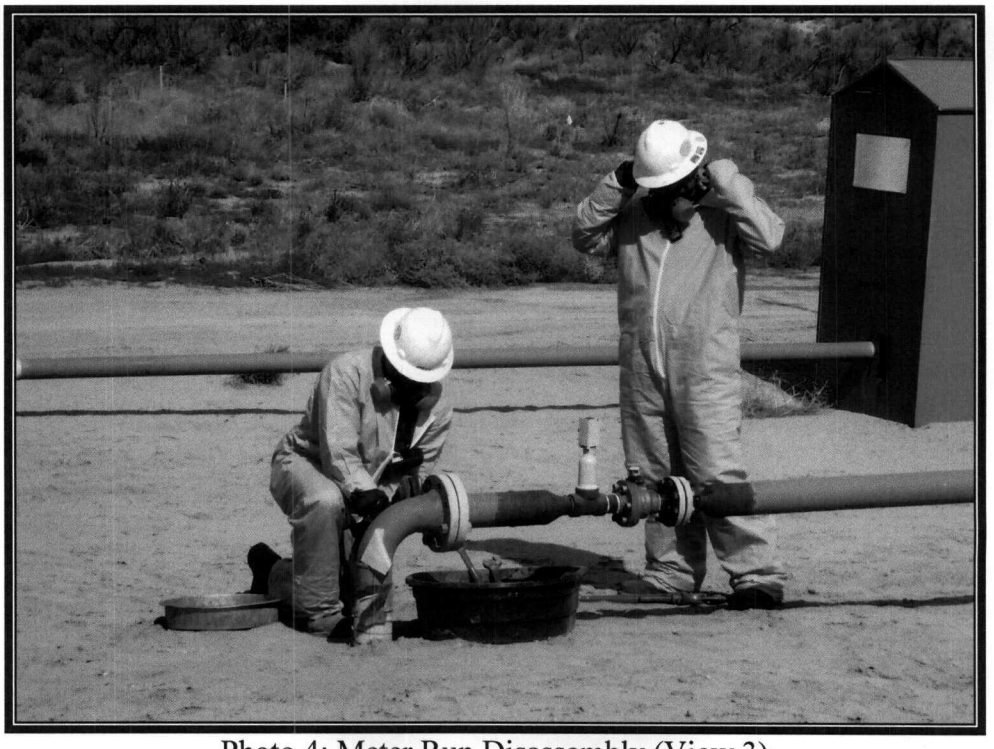


Photo 4: Meter Run Disassembly (View 3)

Photo 5: Preparing Meter-Run and Tubing for Transportation

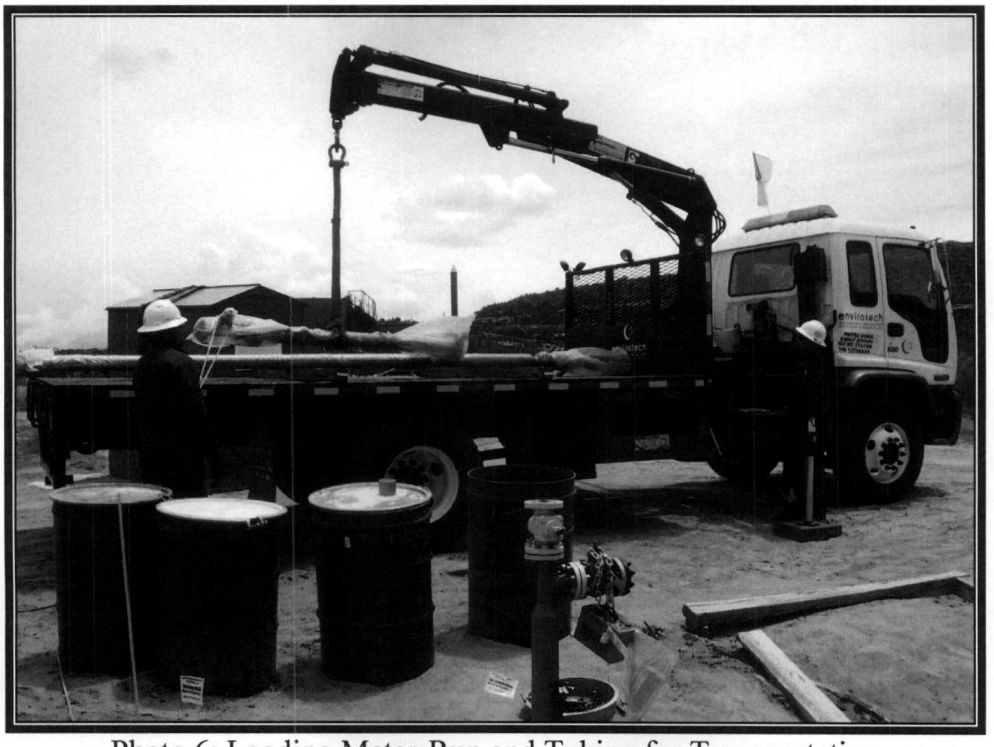


Photo 6: Loading Meter-Run and Tubing for Transportation

Photo 7: View of Line Drip after Excavation

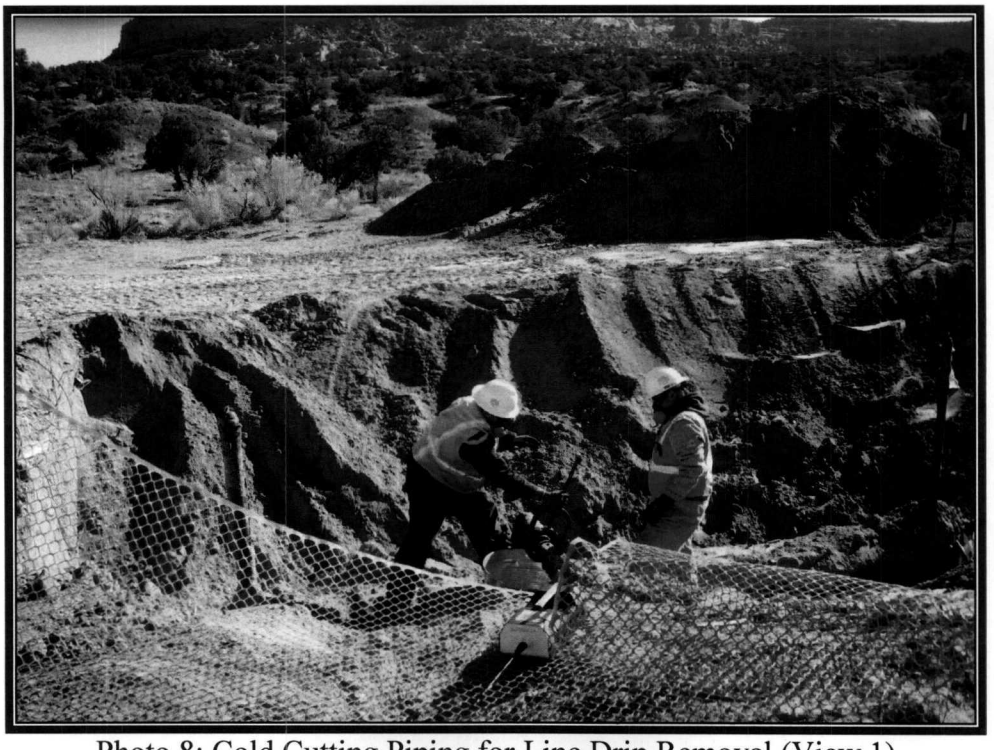


Photo 8: Cold Cutting Piping for Line Drip Removal (View 1)

Photo 9: Cold Cutting Piping for Line Drip Removal (View 2)

Photo 10: Loading Line Drip for Transportation

2007 APR 18 PM 1 08

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL
Envirotech, Inc. Main Office and Maintenance Yard (GW221)
DISCHARGE PERMIT APPROVAL CONDITIONS
April 9, 2007

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

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

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

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on November 16, 2010** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

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

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its January 5, 2007, discharge permit renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Underground Process/Wastewater Lines:

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

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

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

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

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

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

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

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

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

20. Additional Site Specific Conditions: N/A

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

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

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

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

ENVIROTECH, INC
Company Name-print name above

MORRIS D. YOUNG
Company Representative- print name

Morris D. Young
Company Representative- signature

Title PRESIDENT

Date: 04-16-07

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 4/16/07

or cash received on _____ in the amount of $ 1700.00

from Envirotech Inc

for GW-221

Submitted by: Lawrence Romero Date: 4/23/07

Submitted to ASD by: Lawrence Romero Date: 4/23/07

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

January 22, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0029

Mr. Morris Young
Envirotech, Inc.
5796 US Highway 64
Farmington, New Mexico 87401

RE: Discharge Plan Renewal GW-221
Envirotech, Inc.
Farmington Service Facility
San Juan County, New Mexico

Dear Mr. Young

The ground water discharge plan renewal GW-221 the Envirotech, Inc. Farmington Service Facility located in the NE/4 NW/4 of Section 27, Township 29 North, Range12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy of the Discharge Plan Approval Conditions to the New Mexico Oil Conservation Division (OCD) Santa Fe office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on August 21, 1995 and approved November 16, 1995. The discharge plan renewal application letter, dated October 16, 2000, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Envirotech, Inc. of liability should operations result in pollution of surface water, ground water or the environment.

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

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."

Pursuant to Section 3107.C, Envirotech, Inc. is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on **November 16, 2005**, and Envirotech, Inc. should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the Envirotech, Inc. Farmington Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of $50.00. There is a renewal flat fee assessed for oil and gas service companies equal to one-half of the original flat fee or $690.00. The OCD has received the filing fee.

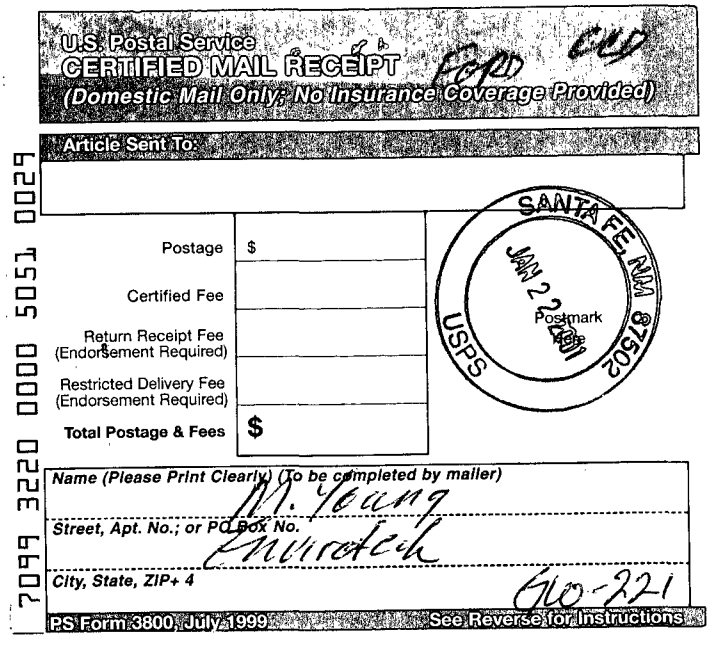
On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

Xc: OCD Aztec Office


U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
Article Sent To:
Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $
SANTA FE, NM 87502 JAN 22 2001 Postmark Here USPS
7099 3220 0000 5051 0029
Name (Please Print Clearly) (To be completed by mailer)
M. Young
Street, Apt. No.; or PO Box No.
Envirotech
City, State, ZIP+ 4
Gb-221
PS Form 3800, July 1999 See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-221
ENVIROTECH, INC.
FARMINGTON SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
January 22, 2001

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for oil and gas service companies. The renewal flat fee required for this facility is $690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   1220 South St. Francis Drive
   Santa Fe, New Mexico 87504

2. Commitments: Envirotech, Inc. will abide by all commitments submitted in the discharge plan renewal application letter dated October 16, 2000 and these conditions for approval.

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

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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, if present, must demonstrate integrity no later than June 1, 2001 and every year from tested date thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by June 1, 2001.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 1, 2001 and every five (5) years thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by June 1, 2001.

11. Class V Wells: No 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. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. 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.

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

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

15. Storm Water Plan: The facility will have an approved storm water run-off plan by June 1, 2001

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

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

ENVIROTECH, INC.

Print Name: _____

Signature: _____

Title: _____

Date: _____

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-221) - Mr. Morris D. Young, ENVIROTECH, INC., 5796 US Highway 64, Farmington, New Mexico 87401 has submitted an application for their FARMINGTON OILFIELD SERVICE CENTER located in the NE/4 NW/4 of Section 27, Township 29 North, Range 12 West, San Juan County, New Mexico. All effluents generated at this facility are collected in a closed top tank prior to transport off-site to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of May, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

for LORI WROTENBERY, Director

SEAL

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, NM 87505

November 16, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-974

Mr. Robert Young
ENVIROTECH INC.
5796 US HWY 64 - 3014
Farmington, NM 87401

RE: Approval of Discharge Plan GW-221
ENVIROTECH INC., Farmington Facility
San Juan County, New Mexico

Dear Mr. Young:

The **discharge plan GW-221 for the ENVIROTECH INC. Facilities** located in NE/4 NW/4 Section 27, and NW/4 NE/4 Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** subject to the conditions contained in the enclosed attachment. The discharge plan consists of the application and its contents dated August 21, 1995 and subsequent letters of clarification dated October 26, 1995 from ENVIROTECH INC.

The discharge plan application was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve ENVIROTECH INC. of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

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

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire November 16, 2000, and you should submit an application for renewal in six (6) months before this date.

The discharge plan application for the ENVIROTECH INC. is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars ($50) plus the flat fee of one thousand three-hundred and eighty dollars ($1380.00) for Service company facilities.

The $50 filing fee has been received by the OCD. The flat fee for an approved discharge plan has not been received by the OCD. The flat fee check should be submitted to the **NMED - Water Quality Management** through the NMOCD office in Santa Fe, New Mexico.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/pws

Attachment

xc: Mr. Denny Foust - Environmental Geologist
Mr. Coby Muckelroy - NMED, Hazardous Waste and Radioactive Materials Bureau.

ATTACHMENT TO DISCHARGE PLAN GW-221 APPROVAL
ENVIROTECH INC. - Farmington
DISCHARGE PLAN REQUIREMENTS

November 16, 1995

1. Payment of Discharge Plan Fees: The one thousand three hundred and eighty dollar ($1380) flat fee shall be submitted upon receipt of this approval. The flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the five (5) year duration of the plan, with the first payment due upon receipt of this approval.

2. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain 1 1/3 times the capacity of the tank or 1 1/3 times the volume of all interconnected tanks.

3. Drum Storage: All drums will be stored on pad and curb type containment.

4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116. (Phone: 334-6178)

5. Modifications: All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.

6. Waste Disposal:

   A. All wastes shall be disposed of at an NMOCD approved facility.
   B. Only oilfield exempt wastes can be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an NMOCD approved facility.
   C. All hazardous waste issues will be addressed by NMED Hazardous and Radioactive Materials Bureau.(Phone: (505)-827-1558)

OIL CONSERVATION DIVISION

September 29, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-963-071

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

RE: Glycol filter disposal
Farmington Facilities
San Juan County, New Mexico

Dear Mr. Young:

The NMOCD has NOT RECEIVED a response from ENVIROTECH INC. regarding the May 19, 1995 letter submitted to you regarding the March 27, 1995 letter that was sent to Mr. Roger Anderson regarding the above captioned item. With the winter months approaching it is the NMOCD's concern that this method of "Waste Management" will not be submitted by ENVIROTECH INC. in such a manner as the NMOCD can approve this process.

If you have any questions regarding this matter please feel free to call me at (505)-827-7156 or Roger Anderson at (505)-827-7152.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer

xc: Denny Foust

Z 765 963 071

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Morris.	
Street and No.	
P.O., State and ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, March 1993

OFFICE OF THE SECRETARY - P. O. BOX 6429 - SANTA FE, NM
ADMINISTRATIVE SERVICES DIVISION - P. O. BOX 6429 - SANTA F
ENERGY CONSERVATION AND MANAGEMENT DIVISION - P. O. BOX 6429 -
FORESTRY AND RESOURCES CONSERVATION DIVISION - P. O. BOX 1948 -
MINING AND MINERALS DIVISION - P. O. BOX 6429 - SANTA FE,
OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FE, N
PARK AND RECREATION DIVISION - P. O. BOX 1147 - SANTA FE,

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 19, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-962-684

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

RE: Glycol filter disposal
Farmington Facilities
San Juan County, New Mexico

Dear Mr. Young:

The NMOCD has received the March 27, 1995 letter from Envirotech regarding the use of a heater to incinerate glycol filters. Envirotech is correct in its statement that NMOCD has jurisdiction over oilfield exempt waste such as glycol filters. However, upon review of the letter dated March 27, 1995 from Envirotech the NMOCD requests that the following additional information be provided:

I. What EPA design parameters were used in the specification and construction of this heater? (Supply design blueprints)

II. What types of fluids (glycols) have been used in the filters? Please provide MSDS sheets on the glycol.

III. Would any other types of RCRA exempt filters be burned at the facility - i.e Amine filters, etc.? Please provide MSDS sheets on these fluids as well.

IV. Please provide a calculation that would show an estimate on the BTU/hr. that this heater would generate?

V. How long has this heater been in operation, and has it only burned RCRA exempt waste?

VI. Will this heater be operated in the summer? If not how will filters be stored?

If you have any questions regarding this matter please feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer

xc: Denny Foust

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

OIL CONSERVATION DIVISION
RECEIVED

'95 MAR 30 PM 8 52

March 27, 1995

Mr. Roger Anderson, Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Glycol Filter Disposal

Dear Mr. Anderson:

Natural gas dehydration wastes, including glycol filters and filter media, are specifically exempted by USEPA from consideration as hazardous waste. Disposal of exempt oilfield exploration and production waste falls under the authority of the New Mexico Oil Conservation Division.

As per our recent conversation, Envirotech Inc. has received requests from several of our oilfield service clients to assist them in recycling their used dehydrator and gas plant glycol filter elements.

These used filter elements have a heat value and a metal core that qualify them for recycling as recommended by the USEPA.

Envirotech has constructed a used filter forced air heater for our maintenance shop area that works very well in heating the interior of the shop area. This allows us to recover the heat value from the filter element. The metal core and/or casing that remains from using the filter media as 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 that remains. As per the analysis, this ash is non-hazardous. We dispose of the ash at the San Juan County Landfill. If Non-Haz why Not Land farm?

The purpose of this writing is to make sure that our understanding of NMOCD regulations and USEPA guidelines coincide with NMOCD in extending this disposal service to our oilfield clients. We feel that recycling this material not only meets the national objections of recycling, but also precludes the potential retained liability that landfilling these filter elements creates for our clients.

5796 U.S. Highway 64-3014 • Farmington, NM 87401 • Tel 505 • 632 • 0615 • Fax 505 • 632 • 1865

Specifically we request the NMOCD evaluate this disposal method and provide directions on the appropriateness of this method to handle the gycol filter waste disposal problem. Your cooperation and help in this matter is greatly appreciated.

Sincerely,

Morris D. Young
President

Attachments

MDY:vh\glyfil

ENVIROTECH LABS

5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615 • FAX: (505) 632-1865

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

ENVIROTECH LABS

5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615 • FAX: (505) 632-1865

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

5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401
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	ANALYSIS/PARAMETERS
Envirotech	Envirotech Yard	
Sampler: (Signature)	Chain of Custody Tape No.	
[signature]	91005	

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

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
[signature]	12-3-93	0745	[signature]	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

san juan repro Form 578-81