

GW - 376

INSPECTION

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, June 18, 2009 4:55 PM
To: 'SchweigertStacee'; 'Campbell,Vaughn'
Cc: Powell, Brandon, EMNRD
Subject: OCD Inspection on 06.12.09 of GW=376
Attachments: GW-376, Inspection Photos.pdf

Ms. Stacee Schweigert,

I have reviewed your June 16, 2009 letter in reference to the OCD discharge permit.

The OCD commends Champion Technologies efforts in adhering to its discharge permit for the Aztec facility, GW-376.

On June 12, 2009 I meet with Mr. Vaughn Campbell on an unannounced visit to the Aztec facility.

Over the facility is in good condition. As always there is room for improvement and I would like Champion Technologies to keep a good facility.

Here are some areas to work on, see photos in the attached Inspection Photo sheet.

1. **Photos 1 & 2:** Sumps should be kept dry at all times when possible. Sump fluids are to be removed within 72 hours.
2. **Photo 3:** All containers are properly kept except for the black barrels sitting on the bermed containment area. Keep an eye on such practices.
3. **Photo 4 – 6:** The location for parked trucks appear to have several oil staining. Before this gets out of hand I would suggest that Champion Technologies ensure that all trucks are properly maintained so that continuation of discharges cease from vehicles.

See the discharge permit for complete details.

Champion Technologies are made aware of these concerns and should be properly addressed.

No response on these concerns is needed at this time, but they will be noted on the next inspection and verified then.

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/oed/>

OCD Inspection: Aztec Champion Technologies GW - 376

Inspector(s): Leonard Lowe

Company Rep:

Date: 06.12.09

Time: 10:40 – 11:00

Page 1

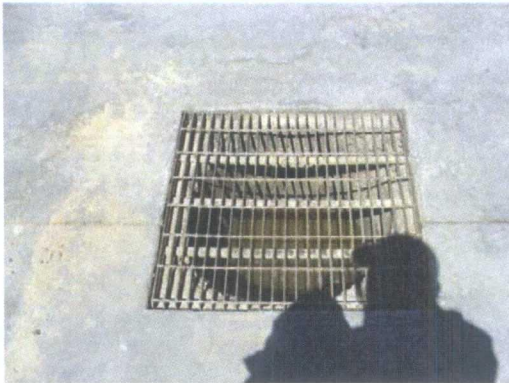


Photo 1: A wet sump.



Photo 2: Another wet sump.



Photo 3: Barrels on impermeable area.



Photo 4: Spotty soil around parked trucks.



Photo 5: Contamination in truck area.



Photo 6: Contaminated soils in truck parking area. Facing west.



RECEIVED

June 16, 2009

2009 JUN 18 PM 1 08

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505

GW - 376

RE:

Dear Mr. Lowe:

Enclosed per your request is a hardcopy of the attachments to the email dated April 9, 2009. Below is a copy of the body of the email dated April 9, 2009 for your reference.

"Thank you for taking the time to talk with me yesterday. As discussed, all three concerns identified in Condition 16 have been addressed. The three concerns were:

1. Photo One: Empty barrels need to be placed in secondary containment.
Champion purchased secondary containment structures for the empty drums in June 2008. Attached is a picture of the containment structure.
2. Photo Two – Sump Property managed – see attached email from you stating sump meets definition of "small."
3. Photo Three – Large tanks appear empty need secondary containment.
At time of site visit, tanks had not been installed. Please see attached photos from May showing the facility in operations."

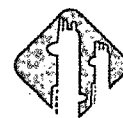
If you have any questions, please call me at 713-423-7905.

Sincerely,

Stacey Schweigert

Enclosures: Photo: Empty Barrels
Email Chain – sump
Photo: Facility

cc: Clint Johnson, ABU QHSSE Manager
Harlan Giles, ABU Rocky Mountain Regional Representative
Vaughn Campbell, Aztec Operations Manager





Empty drum storage area –secondary containment; April 2009 (containments purchased in June 2008)



Empty drum storage area –secondary containment; April 2009 (containments purchased in June 2008)

Schweigert,Stacee

From: Lowe, Leonard, EMNRD [Leonard.Lowe@state.nm.us]
Sent: Friday, May 23, 2008 12:08 PM
To: Schweigert,Stacee
Subject: RE: Response, GW-376 Champion Tech, Aztec Facility

Stacee,

Yes, that is considered a small sump ~ 50 gallons according to your dimensions.

llowe

From: Schweigert,Stacee [mailto:Stacee.Schweigert@CHAMP-TECH.com]
Sent: Friday, May 23, 2008 10:18 AM
To: Lowe, Leonard, EMNRD
Cc: Powell, Brandon, EMNRD; Johnson,Clint; Campbell,Vaughn
Subject: RE: Response, GW-376 Champion Tech, Aztec Facility

Leonard,

Does the sump at Aztec qualify as a small sump as defined by the permit condition #11- Below-Grad 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 monthly inspection if 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.

We believe the sump falls into the category of a small sump since its dimensions are 2ft x 2ft x 1.67 ft. The purpose of the sump is to facilitate fluid removal. Without the grade to the sump or a depression, fluids cannot be removed without the use of squeegees since pumps require a certain amount of fluid to be present in order to work. One of my mentors used the analogy of tilting a glass of soda to get that last drop of soda using a straw. If the glass is not tilted the result is a loud slurping sound.

As long as the Aztec facility consistently removes the fluids within 72 hours would the sump qualify as a small sump? Please call me with any questions.

Hope you have a great long weekend!

Stacee Schweigert
Environmental Specialist
Champion Technologies
3200 Southwest Freeway, Suite 2700
Houston, Texas 77027
Office: 713-423-7905
Mobile: 713-705-6502
Fax: 713-423-7981

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, May 19, 2008 12:30 PM
To: Schweigert,Stacee

Cc: Powell, Brandon, EMNRD

Subject: Response, GW-376 Champion Tech, Aztec Facility

Ms. Stacey Schweigert,

In response to your last remaining inquiry about storage of empty drum barrels: Yes, they need to be properly placed on an impermeable pad with curbing.

For sump testing notification, read and understand the conditions stated within the permit. Give notice to the Santa Fe office and the local OCD field office, Aztec prior to testing. The Aztec representative is Mr. Brandon Powell, Environmental Specialist, 1000 Rio Brazo Road, Aztec, N.M. 87410 Office: 505-334-6178, Ext. 15 Cell: 505-320-0200.

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer

Oil Conservation Division/EMNRD

1220 S. St. Francis Drive

Santa Fe, N.M. 87505

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General Facility – tank storage area



General Facility – drum storage area (curbed)

Lowe, Leonard, EMNRD

From: Schweigert,Stacee [Stacee.Schweigert@CHAMP-TECH.com]
Sent: Tuesday, June 16, 2009 5:29 PM
To: Lowe, Leonard, EMNRD
Cc: Johnson,Clint; Giles,Harlan; Campbell,Vaughn
Subject: RE: GW-376, PERMIT CONDITION 16

Leonard,

I missed today's FedEx delivery, but you should receive the Hard Copy of the emailed attachments Thursday. If you have any questions, please call me at 713-423-7905. Thanks,

Stacee Schweigert
Environmental Specialist

-----Original Message-----

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Tuesday, June 16, 2009 3:52 PM
To: Schweigert,Stacee
Subject: RE: GW-376, PERMIT CONDITION 16

Stacie,

Can you send me a HARD COPY of the items attached within this last e-mail.

Our IT system would not allow us to open these items.

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/>

-----Original Message-----

From: Schweigert,Stacee [mailto:Stacee.Schweigert@CHAMP-TECH.com]
Sent: Thursday, April 09, 2009 8:31 AM
To: Lowe, Leonard, EMNRD
Subject: FW: GW-376, PERMIT CONDITION 16

You have been sent a secure delivery from Champion Technologies.

To access the delivery, click on the following link or copy and paste the link into any browser.

Sender : Schweigert,Stacee
Link : <https://bdsftp.champ-tech.com/bds/Login.do?id=A041341884&p1=z9j24kmsbfcefcjjflcjfhei20>

Sent To : leonard.lowe@state.nm.us
Cc : Johnson, Clint, Giles, Harlan, Campbell, Vaughn
Expires : 5/9/09 9:30:33 AM CDT

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