GW - 27

PERMITS, RENEWALS, & MODS

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

AUGUST 22, 2011

Mr. Cal Wrangham
Targa Midstream Services, L.P.
6 Desta Drive
Midland, Texas 79705

Mr. Wrangham:

In its August 16, 2011 letter, the Oil Conservation Division (OCD) mistakenly referred to several facilities that Targa does not operate. We apologize for the confusion.

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit," the Oil Conservation Division (OCD) has determined that several of your facilities with an expired permit do not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permits for GW-005 (Eunice GP), GW-025 (Monument GP), GW-026 (Saunders GP), GW-27 (Vada CS, GW-29 (Buckeye CS), GW-344 (South Eunice CS), and GW-345 (North Eunice CS) are hereby rescinded and you are not required to proceed with the renewal of these expired WQCC Discharge Permits. OCD will close these permits in its database.

Because your WQCC Discharge Permits are no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage, and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit.

If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488. Thank you for your cooperation.

Jami Bailey
Director

TARGA

Targa Midstream Services Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
432.688.0555
www.targaresources.com

Certified Mail: 7005 1160 0003 2566 4088

October 10, 2010

Leonard Lowe
Environmental Engineer
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Dear Sir:

Targa Midstream Services, L. P. would like to renew the Vada Compressor Station Discharge Plan as required by WQCC Sec. 3106.

Please find the attached renewal form and the entire Vada Compressor Station Discharge Plan per your request. A check in the amount of $100.00 was submitted previously on November 11, 2009, which constitutes the filing fee for the Discharge Plan renewal.

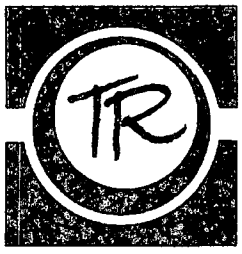
There are no changes from existing Discharge Plan.

Please call me with any questions, Office (575) 396-3221 ext. 238 or Cell (575) 631-7093.

Sincerely,

Cindy Klein

Cindy Klein
ES&H Specialist



TARGA

VADA COMPRESSOR STATION
DISCHARGE PLAN

PERMIT # GW-027

SPILL PREVENTION CONTROL
AND COUNTERMEASURE PLAN

WASTE MANAGEMENT PLAN

TARGA MIDSTREAM SERVICES
LIMITED PARTNERSHIP

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, AND CRUDE OIL PUMP STATIONS

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

☐ New ☒ Renewal ☐ Modification

1. Type: Vada Compressor Station

2. Operator: Targa Midstream Services, L. P.

   Address: PO Box 1689 Lovington, NM (15 miles West of Tatum on Hwy 380, turn North on 9 Mile Ranch Road, turn right where pavement ends on 9 Ranch Road and go 3.3 miles to Vada)

   Contact Person: Cal Wrangham Phone: (432) 688-0542

3. Location: NW /4 /4 Section 23 Township 10 South Range 33 East
   Submit large-scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site. **Section I, General Information**

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **Section V, Tab labeled #5**

6. Attach a description of all materials stored or used at the facility. **Section V, Tab labeled #6 for a list of tanks/contents**

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included. **Section VII, Vada Waste Streams**

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **Section VII, Vada Waste Streams**

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **No proposed modifications**

10. Attach a routine inspection and maintenance plan to ensure permit compliance. **Section V, Tab labeled #10, Inspections and Records**

11. Attach a contingency plan for reporting and clean-up of spills or releases. **Section V, Tab labeled #10**

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **Section I, General Information**

12. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **Section IX, Closure Plan**

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: Cindy Klein Title: ES&H Specialist

Signature: Cindy Klein Date: February 10, 2010

E-mail Address: cwwr@targaresources.com

TARGA MIDSTREAM SERVICES LIMITED PARTNERSHIP

DISCHARGE PLAN GW-027

VADA COMPRESSOR STATION

TABLE OF CONTENTS

SECTION 1

GENERAL INFORMATION

SECTION 1 - GENERAL INFORMATION

The Following is the Vada Compressor Station Discharge Plan and is in accordance with part 3100 of the State of New Mexico Water Quality Control Commission Regulations. The facility is a compressor station operating approximetly 7,110 horsepower.

This Plan provides information regarding any potential discharges onto or below the surface of the ground.

NAME OF OPERATOR

Targa Midstream Services Limited Partnership operates the facility. The main office is located at 1000 Louisiana St. Ste. 4700 Houston, TX 77002
The local Saunders Plant address and phone number is :
P.O. Box 1689
Lovington, NM 88260
505.396.3221

The local contact is the Area Manager.

LOCATION OF DISCHARGE PLAN FACILITY

From Tatum, NM take US 380 west approximetly 15 miles to NM 457. Turn right (north) to Epperson Road (where pavement ends). Turn right and proceed approximetly 3.3 miles.

FACILITY DISCRIPTION

The Vada Compressor Station simply compresses raw field inlet gas (green gas) utilizing natural gas fueled engines driving compressors. The compressed gas is transported via pipeline to the Saunders Gas Processing Plant.

SOURCES OF EFFLUENT AND WASTE SOLIDS GENERATED AT THE FACILITY

The stages of compression use scrubbers to capture liquids that fall from the gas stream. A portion of these liquids is produced water which goes to sump system. The remainder of the liquids are

hydrocarbons. These hydrocarbons are pipelined or trucked from the facility.

Depth of Ground Water

The depth to ground water is approximately 35'.

SECTION 2

LAST RENEWAL INFORMATION

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
Phone 432-688-0555
Fax 432-688-0552
www.dynegy.com

Sandoval

DYNEGY

Certified Mail: 7004 1160 0000 4500 3298

November 1, 2005
Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Dear Sir:

Please find attached the signed copy of the conditions of approval and the check for the renewal flat fee for a compressor station in the amount of $1700.00.

Please call me with any questions, Office (432) 688-0542 Cell (432) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Mr. Chris Williams, Hobbs District 1 Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

September 29, 2005

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan Renewal GW-027
Dynegy Midstream Services, L.P.
Vada Gas Compressor Station
Lea County, New Mexico

Dear Mr. Wrangham:

The groundwater discharge plan renewal application GW-027 for the Dynegy Midstream Services, L.P. Vada Gas Compressor Station located in of Section 23, Township 10 South, Range 33 East, NMPM, Lea 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 to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan application was submitted on July 27, 1981 and approved on July 31, 1985 with an expiration date of July 31, 1990. The discharge plan renewal application dated June 13, 2005 submitted pursuant to Section 3106 and 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 permit is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve Dynegy Midstream Services, L.P. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Dynegy Midstream Services, L.P. of its responsibility to comply with any other governmental authority's rules and regulations. Please be advised that all exposed pits, including lined pits and open top 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 requires that "when a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to Section 3107.C., the OCD Director shall be notified 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 approval is for a period of five years. **This approval will expire July 31, 2010** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, 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.

The discharge permit application is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge permit will be assessed a fee equal to the filing fee of $100 plus a renewal flat fee of $1700 for a Gas Compressor Station greater than 1001 horsepower.

Please make all checks payable to: **Water Quality Management Fund**
C/o: Oil Conservation Division
1220 S. Saint Francis
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail wayne.price@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
Dynegy Midstream Services, L.P., Vada Gas Compressor Station (GW-027)
DISCHARGE PERMIT APPROVAL CONDITIONS
September 29, 2005

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received. The $1700.00 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Commitments: The permit holder will abide by all commitments submitted in the discharge permit renewal application and these conditions for approval.

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

4. 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.

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

6. 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.

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

8. Below Grade Tanks/Sumps/Pits/Ponds: All below grade tanks, sumps, pits and ponds must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design, unless approved otherwise. All below grade tanks, sumps and pits must be tested annually or as specified herein, except systems that have secondary containment with leak detection. These systems with leak detection shall have a monthly inspection of the

leak detection to determine if the primary containment is leaking. Results of tests and inspections shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Any system found to be leaking shall be reported to OCD within 15 days. Permit holders 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Permit holders 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. Any system found to be leaking shall be reported to OCD within 15 days. The OCD will be notified at least 72 hours prior to all testing.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation 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.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203.

13. 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 permit will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water: Stormwater runoff plans and controls shall be maintained to prevent water contaminants, that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 or Toxic Pollutants as defined in 20 NMAC 6.2.7.VV from being discharged in any stormwater run-off.

16. Vadose Zone and Water Pollution: Any vadose zone or water pollution including future discoveries will be addressed through the discharge permit. Dynegy shall be responsible for reporting, investigating, remediating and/or abating all water contaminates. A permit modification may be required upon notification from OCD to prevent water pollution or abate contamination. Failure to properly report, investigate, remediate or abate vadose zone or groundwater contaminates will be considered a violation of the permit.

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

18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

19. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** 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.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

Clark White
Company Representative- print name

Clark White Date 10/4/05
Company Representative- Sign

Title V.P. & Region Manager

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877) 672-1449

BANK ONE, NA - 710
CHICAGO, IL
Payable Through First USA Bank, NA

62-28
311
0934623

PAY One Thousand Seven Hundred and NO/100 Dollars

CHECK NO [redacted]

CHECK DATE
10/ 12/ 05

PAY EXACTLY
$******1,700.00
Void After 90 Days

TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

VICE PRESIDENT
AUTHORIZED SIGNATURE

[redacted]

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO SEE THE MARK WHEN CHECKING THE ENDORSEMENTS.

000003 PAYEE	PAYEE NO.	CHECK NO.	DATE
WATER QUALITY MANAGEMENT FUND	26062	[redacted]	10/12/05

VOUCHER	VENDOR INVOICE #	INVOICE DATE	TOTAL AMOUNT	PRIOR PAYMENTS	NET AMOUNT
00091923	GW027 Vada Pet	20050929	RTN X75064 - J. CLIFTON	$	1,700.00

DYN-6005 (9/00)

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Dynegy Midstream Services, L.P., Vada Gas Compressor Station (GW-027)
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September 29, 2005

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Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water: Stormwater runoff plans and controls shall be maintained to prevent water contaminants, that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 or Toxic Pollutants as defined in 20 NMAC 6.2.7.VV from being discharged in any stormwater run-off.

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18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

19. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** 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.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

_____
Company Representative- print name

_____ Date_____
Company Representative- Sign

Title_____

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 permit application(s) has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

NOTICE OF PUBLICATION

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-26) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-27) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Vada Compressor Station located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 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 permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site http://www.emnrd.state.nm.us/ocd/. Prior to ruling on any proposed discharge permit 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 and a public hearing may be requested by any interested person. Requests for a 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 permit based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877)672-1449

BANK ONE, NA - 710
CHICAGO, IL
Payable Through First USA Bank, NA

62-28
311
0934623

PAY Three Hundred and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	06/ 20/ 05	$*********300.00

Void After 90 Days

TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

VICE PRESIDENT
AUTHORIZED SIGNATURE

[redacted]

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO SEE THE MARK WHEN CHECKING THE ENDORSEMENTS.

000006 PAYEE	PAYEE NO.	CHECK NO.	DATE
WATER QUALITY MANAGEMENT FUND	26062	[redacted]	06/20/05

VOUCHER	VENDOR INVOICE #	INVOICE DATE	TOTAL AMOUNT	PRIOR PAYMENTS	NET AMOUNT
00087566	061705	20050617 RTN X75064 JO CLIFTON		$	300.00

DYN-6005 (9/00)

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
Phone 432-688-0555
Fax 432-688-0552
www.dynegy.com

DYNEGY

June 13, 2005

Wayne Price
Environmental Engineer
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Dear Sir:

Dynegy Midstream Services, L. P. would like to renew the Vada Compressor Station Discharge Plan as required by WQCC Sec. 3106.

Please find the attached the renewal form and a check in the amount of $100.00, which constitutes the filing fee for the Discharge Plan renewal.

Please call me with any questions, Office (432) 688-0542 Cell (432) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Mr. Chris Williams, Hobbs District 1 Office

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, AND CRUDE OIL PUMP STATIONS

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

☐ New ☒ Renewal ☐ Modification

1. Type: Vada Compressor Station

2. Operator: Dynegy Midstream Services, L. P.

   Address: PO Box 1689 Lovington, NM (15 miles West of Tatum on Hwy 380, turn North on 9 Mile Ranch Road, turn right where pavement ends on 9 Ranch Road and go 3.3 miles to Vada)

   Contact Person: Cal Wrangham Phone: (432) 688-0542

3. Location: NW /4 /4 Section 23 Township 10 South Range 33 East
   Submit large-scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site. **See on file at OCD**

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **See on file at OCD**

6. Attach a description of all materials stored or used at the facility. **See on file at OCD**

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included. **See on file at OCD**

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See on file at OCD**

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See on file at OCD**

10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See on file at OCD**

11. Attach a contingency plan for reporting and clean-up of spills or releases. **See on file at OCD**

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **See on file at OCD**

12. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See on file at OCD**

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

Name: Cal Wrangham Title: ES&H Specialist

Signature: Date: June 13, 2005

E-mail Address: cwwr@dynegy.com

SECTION 3

TOPOGRAPHIC

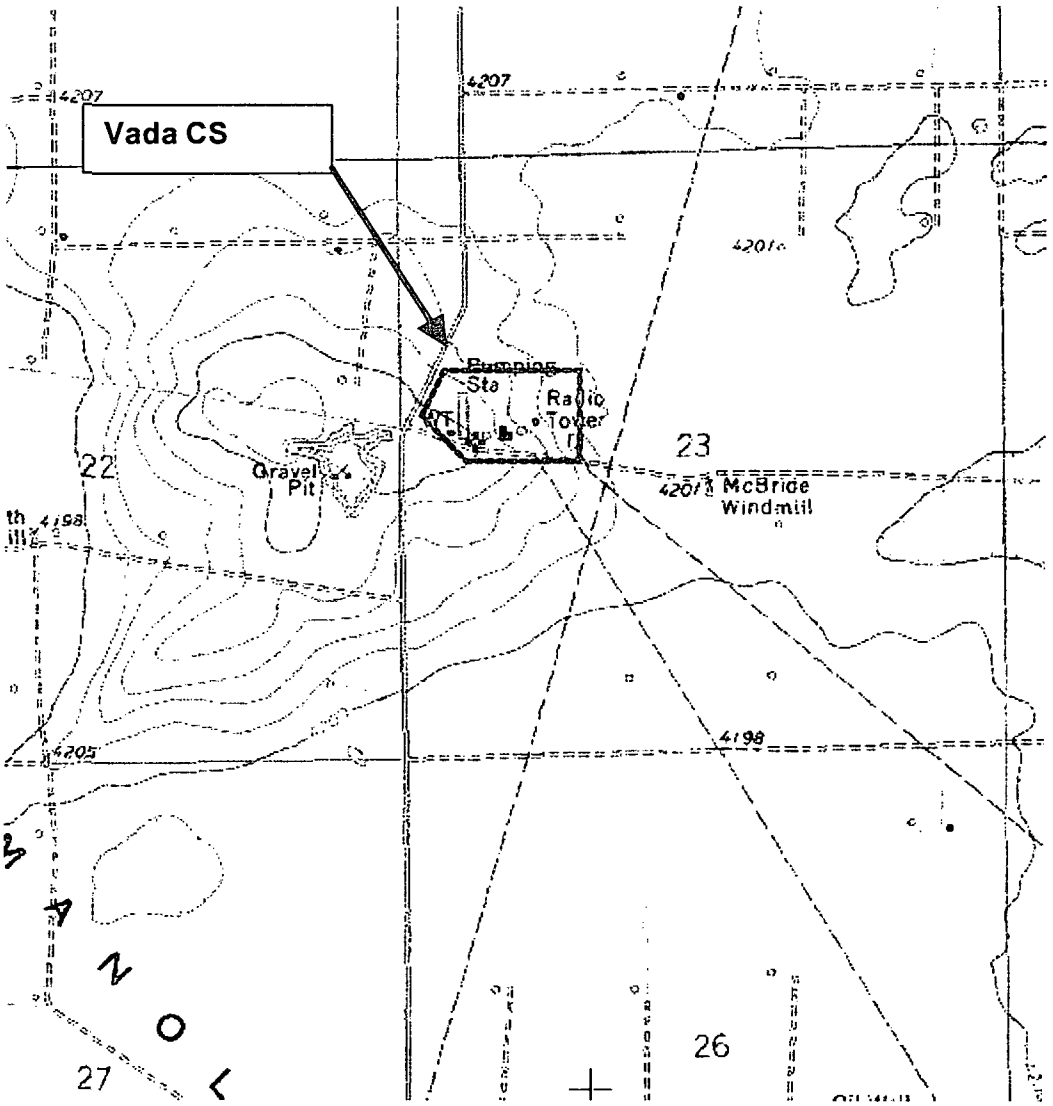


FIGURE 1

Vada Compressor Station
Location Map

(USGS *Lane Salt Lake*, NM Quad (1982))
Scale: 1:24,000

SECTION 4

UNDERGROUND DRAIN SYSTEM

Targa Midstream Services
Limited Partnership

6 Desta Dr., Suite 3300
Midland, Texas 79705
432-688-0555
www.targaresources.com

December 20, 2005
Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: GW-027
Vada Compressor Station
Discharge Plan Renewal

Dear Sir:

This letter is to notify the agency as per Condition 8 and 9 of the Renewal Conditions for the Vada Compressor Station, dated September 29, 2005. The drain system integrity tests will begin on December 28, 2005. The sump will be drained, cleaned, and visually inspected for cracks and the drain lines to the sump will be pressure tested to 3-5 psi with an air/water mixture for a 15 minute period to ensure integrity.
Please call with any questions or concerns. (432) 688-0542.

Sincerely,

Cal Wrangham
Targa Midstream Services
Environmental, Safety, and Health

Cc: Chris Williams/ OCD Hobbs
Wayne Price/ OCD Santa Fe
Tim Jordan/ Saunders Area Manager

Bill Little

02/10/2006 10:40 AM

To: Cal Wrangham/TRI@TRI, Tim Jordan/HOU/Dynegy@TRI
cc: Mario Corral/TRI@TRI
bcc:
Subject: Saunders, Vada drain test

Cal - Saunders and Vada drain systems testing is complete. Mario did an excellnt, thorough, and accurate job.

Thanks,
Bill

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART 1
GENERAL INFORMATION

1. Name of facility: **Versado Gas Processors - See attached Data Sheets**

2. Type of facility: **See attached data sheets**

3. Location of facility: **See attached Data Sheets**

4. Name and address of owner or operator:

Targa Midstream Services, Limited Partnership

1000 Louisiana Street
Suite 4300
Houston, Texas 77002

5. Designated person accountable for oil discharge prevention for Targa Midstream Services, Limited Partnership (40 CFR 112.5 (f)(2)):

Facility	Person Accountable for Discharge Prevention
Eunice Area	James Lingnau
Monument Area	Todd Young
Saunders Area	Tim Jordan

MANAGEMENT APPROVAL AND COMMITMENT OF MANPOWER

This SPCC Plan will be implemented as herein described. I hereby commit the necessary manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged. (40CFR112.3(d)(2) and 40 CFR112.7(d)(2))

Signature:

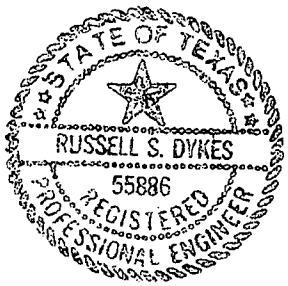
Name: Clark White

Title: Vice President, Targa Midstream Services, Limited Partnership

SPCC CERTIFICATION (40 CFR112.3(d))

I hereby certify that:

1. I am familiar with the provisions of 40 CFR, Part 112;
2. I have personally examined all facilities that are part of this plan;
3. The plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the minimum requirements of this part;
4. That procedures for required inspections and testing have been established; and
5. The plan is adequate for the facilities listed.



Russell S. Dykes, P.E.
Printed Name of Registered Professional

Signature of Registered Professional Engineer

Date: Jan. 20, 2006 Registration No.: 55886 State: TX

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Clark White
Vice President, Targa Midstream Services, Limited Partnership

Data Sheets attached (note: some North Versado facilities are located in Texas, all remaining Versado facilities are located in New Mexico)

Eunice Area (South Versado)	
Eunice Middle Plant (onshore facility)	
Eunice North CS	
Eunice South CS	
Monument Area (South Versado)	
Buckeye CS	
Monument Plant (onshore facility)	
Saunders Area (North Versado)	
457 CS	***Saunders Plant (onshore facility)***
Lehman CS (TX)	**Vada CS**
Plains CS (TX)	**West Seminole CS (TX)**

Note: all facilities in the above table are considered production facilities, unless otherwise noted.

Environmental Incidents / Spill Reporting

If an environmental incident occurs at a Targa facility (this could be a fire, an explosion, a release of regulated materials from a tank, etc.), refer to the Targa "Safety and Environmental Incident Reporting Procedures" Manual ("Orange Book"), Environmental Incident Reporting Procedures (relevant state-specific portions of this manual are attached – 40CFR112.7(a)(5)).

For materials spills and releases:

Federal and State regulations require agency reporting if a release in which more than the "reportable quantity" of a regulated material occurs during a 24-hour period. These regulations require reporting within a limited time period (usually less than 24 hours after the spill occurs). Reportable Quantities are listed in the "Orange Book". If you fill out a spill report that is to be sent to a state or federal agency, the report should be routed through your regional EHS Advisor before sending it to the applicable agency(s).

For additional information concerning environmental incidents, refer to the "Orange Book" or call your regional EHS advisor or the Targa Midstream Services Environmental, Safety and Health Team in Houston:

Name	Telephone
Jessica Keiser	(713) 584-1084
Melanie Roberts	(713) 584-1422
Susan Ninan	(713) 584-1420
Lee Salazar	(713) 584-1421
Darin Kennard	(713) 584-1082
Sara Feucht	(713) 584-1419

Use the Contact List and the state-specific guidance found on the following pages in the event of a release to notify all applicable regulatory agencies, cleanup contractors and TMS personnel of any release of oil to the environment.

Table A
Summary of Federal Hazardous Substance Reportable Quantities

Compound Name	Final RQ – lbs (kg)	Equivalents
Benzene	10 (4.54)	1.3 gallons; 180 gallons Natural Gasoline (1% Benzene)
Xylenes (mixed)	100 (45.4)	13.5 gallons
Butadiene	10 (4.54)	< 2.0 gallons liquid, 69 Cubic Feet of gas at 70 ° F
Chlorine	10 (4.54)	<1.0 gallon; 53 standard cubic feet gas
Diethylamine	100 (45.4)	11.0 gallons
Ethylene Glycol	5000 (2270)	650 gallons (80% Ethylene Glycol)
Hexane	5000	9600 gallons Natural Gasoline (9.4% Hexane)
Hydrogen sulfide	100 (45.4)	1116 Standard Cubic Feet 100MCF of 1% H 2S; 45MCF of 5%H2S 11.6MCF of 10% H2S; 5.6MCF of 20%
Isoprene	100 (45.4)	85 gallons liquid (Boils at 93 ° F)
Mercury	1 (0.454)	< 2 Fluid Ounces
Methanol	5000 (2270)	754 gallons
PCBs	1 (0.454)	0.75 gallons
Potassium hydroxide	1000 (454)	
Sodium hydroxide	1000 (454)	925 gallons of 10% Solution; 150 gallons of 50% Solution
Sulfuric acid	1000 (454)	65 gallons of 93% H2SO4

New Mexico

Reportable Release of Hazardous Substances or Spill of Oil
Page 1 of 2 See Next Page For Detailed Requirements

Form to Use: *Release of Hazardous Substances or Spills of Oil*

Comments: *A timely response is critical. Additional details can be submitted later. See the attached pages for specifics and forms.*

Incident	Report To:
Hazardous Materials or Waste-All Media Release of Reportable quantities of hazardous substances or hazardous waste.	***CALL IMMEDIATELY FOR MAJOR RELEASES*** **Oil & Hazardous Substance** 505-827-2918 - Days **Hazardous Waste** 505-827-1557 - Days 505-827-9329 24-Hour Number New Mexico Environmental Department Water and Waste Management Division Harold Runnels Bldg., 1190 St. Francis Dr. P.O. Box 26110 Santa Fe, NM 87502-6110
Major Unauthorized Release – All Media Unauthorized major release of any of these: • Crude oil • Natural gases • Produced waste • Condensate or oil field waste, including regulated NORM or oil-field-related chemicals, contaminants or Mixtures of these. **Definition of Major Release** • 25 barrels of liquid • 500 or more mcf of natural gases • Any release that does any of these: ➢ Results in a fire ➢ Will reach a water course ➢ Will probably endanger public health ➢ Results in substantial damage to property or the environment **Definition of Minor Release**	505-827-7131 – Days New Mexico Energy, Minerals, and Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505 **Major Releases: Immediately Call the Appropriate Number Below** **Major and Minor Releases** Submit completed Form c-141 to Division and District offices within 5 days: **Roosevelt & Lea County: 505-393-6161** New Mexico Oil Conservation Division, District 1 P.O. Box 1980 Hobbs, NM 88240 **Eddy County: 505-748-1283** **Chaves County: 505-622-2851** New Mexico Oil Conservation Division, District 2 811 S. First Street

• Greater than 5 barrels but less than 25 barrels of liquids. • Greater than 50 mcf but less than 500 mcf of natural gases.	Artesia, NM 88210
Pipeline Releases Report pipeline releases within 2 hours.	505-827-3549 – Days New Mexico Corporation Commission Santa Fe Pipeline Division
Excess Air Emissions Report excess emissions within 24 hours or no later than the next working day.	505-827-1494 – Days New Mexico Environmental Department Air Pollution Control Bureau, 2048 Galesteo Santa Fe, NM 87505

Back to Form C-141

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing, or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A **Major Release** shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

(b) an unauthorized release of any volume which:

(i) results in a fire;

(ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) results in substantial damage to property or the environment;

(c) an unauthorized release of natural gases in excess of 500 mcf; or

(d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A **Minor Release** shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) **Immediate verbal notification** required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73 ; 2-1-96; A, 3-15-97]

(2) **Timely written notification** is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A. 19). [3-15-97]

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form **SEE Rule 116**

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

Texas

Reportable Release of Hazardous Substances or Spill of Oil

Form to Use: *Release of Hazardous Substances or Spills of Oil*

Comments: *A timely response is critical. Additional details can be submitted later. See the attached pages for specifics and forms.*

Incident	Report To:
Oil Spill – Water Any crude oil, condensate, used oil or refined product spill to waters of the United States.	General Land Office (Coastal Zone Only) 800-832-8224 24-Hour Number In addition, report to TCEQ as described below:
Petroleum Spill - Land Petroleum Product or Used Oil: Report Spills of 25 gallons to land. **Hazardous Substance – All Media** Report release of reportable quantity of hazardous substance to air, water, or land. See the Federal page for reportable quantities of the most common hazardous substances found in the midstream business. **Excess Air Emissions** Report flare smoking more than 6 minutes in 2 hours or any other abnormal emission. follow up with FAX form as appropriate to the appropriate TNRCC Regional Office.	Texas Commission on Environmental Quality (TCEQ) Emergency Response Team **512-239-2507** 24-Hour Number Report also to the appropriate TCEQ Regional Office: Region 1 Amarillo 806-353-9251 Region 2 Lubbock 806-796-7092 Region 3 Abilene 325-698-9674 Region 4 Arlington 817-588-5800 Region 5 Tyler 903-535-5100 Region 6 El Paso 915-834-4949 Region 7 Midland 432-570-1359 Region 8 San Angelo 325-655-9479 Region 9 Waco 254-751-0335 Region 10 Beaumont 409-898-3838 Region 11 Austin 512-339-2929 Region 12 Houston 713-767-3500 Region 13 San Antonio 210-490-3096 Region 14 Corpus Christi 361-825-3100 Region 15 Harlingen 956-425-6010 Region 16 Laredo 956-791-6611
DOT Reportable Hazardous Liquid Release From **pipeline**, other than Crude Oil.	**Texas Railroad Commission Pipeline Safety Section** 512-463-6788
Crude Oil, Condensate, or Saltwater – Land Report by phone any crude oil or condensate spill to water and report any spill onto land of 210 gallons (5 barrels). Follow up by sending the H-8 form. Saltwater spills only require a courtesy phone call.	**Texas Railroad Commission District Office** District 1 & 2 San Antonio 210-227-1313 District 3 Houston 713-869-5001 District 4 Corpus Christi 361-242-3113 District 5 & 6 Kilgore 903-984-3026 District 7 B Abilene 325-667-3545

Fires, Leaks, etc – Tanks or Pipelines	District 7 C	San Angelo	325-657-7450
All fires, leaks, spills, or breaks in tanks or	District 8 & 8 A	Midland	432-684-5581
Pipelines where crude oil, condensate, or gas	District 9	Wichita Falls	940-723-2153
Including Hydrogen Sulfide.	District 10	Pampa	806-665-1653

Part I
General Information

Contact List
(40 CFR 112.7 (a)(3)(vi)

NAME	LOCATION	JOB TITLE	OFFICE/EXT.	CELL/Blackberry	HOME PHONE	FAX
Clark White	Midland, TX	V. P. & Region Manager	(432) 688-0550	(281) 850-9175	(432) 686-0903	(432) 688-0552
P B Region Office	**Midland, TX**					
Cal Wrangham		Manager, E,S&H	(432) 688-0542	(432) 425-7072	(432) 697-6580	(432) 688-0552
EUNICE	**Eunice, NM**					
James Lingnau		**Area Manager** Eunice Complex	(575) 394-2534 (226)	(575) 631-7095	(432) 523-3188	(575) 394-2714
Kem Miller		Administrator	(575) 394-2534 (222)		(575) 394-2431	(575) 394-2714
Frank Brainard		Oper. Supervisor	(575) 394-2534 (229)	(575) 631-0420		(575) 394-2714
Walter Burton		Maint. Supervisor	(575) 394-2534 (227)	(575) 631-9338		(575) 394-2714
Chuck Tolsma		Field Supervisor	(575) 394-2516 (327)	(575) 631-6026		(575) 394-1514
Rebecca Woodell		E,S&H Compliance	(575) 394-2534 (239)	(575) 631-7085	(575) 394-2280	(575) 394-2714
MONUMENT	**Monument, NM**					
Todd Young		**Area Manager** Monument	(575) 393-2823 (234)	(575) 441-1645	(432) 523-3770	(575) 393-4780
Kandi Johnson		Administrator	(575) 393-2823 (236)			(575) 393-4780
Joe Gray		Operations/I & E	(575) 393-2823 (229)	(575) 631-7069	(575) 392-7058	(575) 393-4780
Randy Duncan		Field/Maintenance	(575) 393-2823 (235)	(575) 631-7065		(575) 393-4780
Cindy Klein		E,S&H Compliance	(575) 396-3221 (238)	(575) 631-7093	(575) 398-6670	(575) 396-7702
SAUNDERS	**Lovington, NM**					
Tim Jordan		**Area Manager** Saunders/W. Seminole	(575) 396-3221 (231)	(575) 631-7091	(575) 396-0189	(575) 396-7702
Marisol Hinojos		Administrator	(575) 396-3221 (222)			(575) 396-7702
Bill Little		Plant Supervisor	(575) 396-3221 (227)	(575) 631-7099	(575) 396-2997	(575) 396-7702
Ralph England		Field Supervisor	(575) 396-3221 (224)	(575) 441-4653	(575) 760-3407	(575) 396-7702
Cindy Klein		E,S&H Compliance	(575) 396-3221 (238)	(575) 631-7093	(575) 398-6670	(575) 396-7702

Other Contacts	County	Phone		
Lea County Sheriff	Lea, NM	(575) 396-3611		
Roosevelt County Sheriff	Roosevelt, NM	(575) 356-4408		
Cochran County Sheriff	Cochran, TX	(806) 266-5211		
Oil Conservation Commission	NM	(575) 393-6161		
Texas Railroad Commission	TX	(915) 684-5581		
Targa Midstream Services, L.P. Houston Office		1-800-377-3145		

Oil Spill Cleanup:

Disposal of Waste Materials

(40 CFR 112.7(a)(3)(v))

Contractor Name	Telephone Number
B&H Construction - Eunice	575 394 2588
Gandy Corp – Lovington and Tatum	575 398 4960

Note: Targa Midstream Services does not perform oil spill cleanups. In the event of a spill, one of the above contractors is called and that contractor provides all labor, equipment, materials and disposal services. All Targa contractors are required to comply with all applicable federal and state environmental regulations in the course of their activities.

Countermeasures for Discharge Discovery, Response and Cleanup (40CFR112.7(a)(3)(iv)

Oil spill response sections come in here.

Amendment / Periodic Review of SPCC Plans

The owner/operator of a facility is required to review the SPCC Plan at least once every five years. The plan must be amended whenever a change in the facility "materially affects the facility's potential for discharge of oil...", or when new technology provides a more effective means of preventing oil discharge. If the plan is amended (not just reviewed), the amended plan must be recertified by a professional engineer.

The actual text of the regulation is as follows:

§112.5 Amendment of Spill Prevention, Control, and Countermeasure Plan by owners or operators.

If you are the owner or operator of a facility subject to this part, you must:

(a) Amend the SPCC Plan for your facility in accordance with the general requirements in §112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in §112.1(b). Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.

(b) Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or, if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in §112.1(b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation, and must sign a statement as to whether you will amend the Plan, either at

the beginning or end of the Plan or in a log or an appendix to the Plan. The following words will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."

(c) Have a Professional Engineer certify any technical amendment to your Plan in accordance with §112.3(d).

The attached form provides the facility with a means of recording the dates when the plan is reviewed, a space to describe periodic administrative (e.g., name changes, personnel changes, etc.) changes made to the plan and a signature line for the facility manager to attest that the review has been completed (or the administrative change made) and no significant changes were made in the plan. Use the attached form (or additional copies thereof) to record these periodic reviews and / or administrative changes to the plan.

Periodic Review / Administrative Change Record

Facility

Date	Review (✓)	Admin. Change (✓)	Description	Signature

By placing their signature on the form above, the person signing attests that the SPCC Plan review or administrative change described did not result in a change which materially affects the facility's potential for discharge of oil to waters of the United States. To enter a review that does not result in changes to the plan, enter "no change" under description and sign the sheet.

PART II
Design and Operating Information
Page 23

7. Potential Spills -- Prediction & Control

Source	Major Type of Failure	Total Quantity (bbls)	Rate (bbls/hr)	Direction of Flow*	Secondary Containment

See attached Data Sheets

***See maps on attached data sheets**

Discussion:

See attached Data Sheets

8. Containment or diversionary structures or equipment to prevent oil products from reaching navigable waters are practicable. (If NO, complete Attachment #2.)

   Yes, for tanks (40 CFR 112.7(d)).

9. Inspections and Records

   See attached data sheets for details on individual tank inspections.

   The following notes for determining inspection frequencies for metal tanks shall be used (from TMS Inspection Guidelines):

Table 2 shows a suggested inspection interval based on the Risk Assessment Classifications determined from Table 1 (for storage tanks, Table 1 lists the risk assessment classification as either 2 or 3). The first column gives a time period between the initial inspection and the second inspection. This is used to determine a corrosion rate during that time period. The corrosion rate is used to calculate the schedule for the next inspection. The second column gives the maximum recommended time between inspections. If sufficient data is developed over time, the maximum corrosion inspection frequency can be adjusted accordingly since you will have proof to justify setting the schedule.

TABLE 2
INSPECTION INTERVAL GUIDELINE

RISK ASSESSMENT CLASSIFICATION	INTERVAL FROM 1ST INSPECTION	MAXIMUM INTERVAL
1	2 Years	5 Years
2	5 Years	10 Years
3	No Minimum	10 Years
4	Visual Only	None

Table 3 is a guideline for setting Risk Assessment Classifications for some of the services we have in our facilities. These classifications are guidelines only, therefore, judgement and experience should be used in each facility to establish the classifications you will use. Some of the factors to consider include (1) toxicity, (2) volatility, (3) combustibility, (4) location of service with relation to personnel and other equipment, and (5) experience and history.

TABLE 3
RISK ASSESSMENT CLASSIFICATION BY SERVICE

PROCESS SERVICE	>3% H2S	<3% H2S	>3% H2S <15 PSI	CO2 Part. Press. >7 psia	CO2 Part. Press. <7 psia	DRY GAS/ PROD
Wet Gas – Inlet Gas, Treater Overhead	1	2	2	1	2	3
Dry Gas – Downstream of Dehydrators	2	2	3	3	3	3
Treating Liquids –Amine, Glycol, Sulfinol	1	2	2	1	2	3
Process Liquids – Absorption Oil, Etc.	1	2	2	1	2	3
Liquid Products – Propane, Butane, E/P	1	2	2	1	2	3

Special Inspection Considerations

The following situations require more frequent inspection due to potential for accelerated corrosion.

- Injection points where flow enters a line from a side branch or portions of the piping system immediately downstream of pump discharges or control valves are subject to accelerated corrosion or erosion. Injection points can be treated as a separate system with an inspection schedule different than the rest of the system.
- Soil-to-air interfaces where buried piping comes out of the ground should be visually inspected at least annually for coating damage, bare pipe, pitting, etc.
- Corrosion under insulation should be visually inspected annually wherever there is a possibility of the insulation becoming wet and holding moisture such as low points in piping systems, where ice or condensation is common, where exposed to cooling tower mist, etc. Carbon steel lines operating in the temperature range of 25°F to 300 °F are the most susceptible to corrosion under insulation.
- Piping deadlegs should be monitored where water or corrosive liquids can collect and be subject to accelerated corrosion or freezing damage.
- Services such as H2S or amine that did not have postweld heat treated welds are subject to stress corrosion cracking should have the welds inspected along with the corrosion inspection. Approximately 25% of the welds should be inspected at each interval. Visual inspection is adequate unless there is a history of cracking in that service. In this case, magnetic particle inspection of the welds is recommended.

Establishing Corrosion Rate

Corrosion rates can be calculated from the following formulas. Both the Long Term Corrosion Rate and the Short Term Corrosion Rate should be calculated when adequate data is available. The shortest rate should be used to establish remaining life and inspection schedules.

Long Term Corrosion Rate (LT) = $t_{initial} - t_{latest}$
---
time (yrs.) between initial and latest inspection
Short Term Corrosion Rate (ST) = $t_{previous} - t_{latest}$
---
time (yrs.) between latest and previous inspection
Where: t = measured wall thickness in inches

Establishing Remaining Life
Remaining life of a piping system can be calculated from the following formula. The next inspection should be no longer than one-half the remaining corrosion life.

Remaining Life (years) = $t_{actual} - t_{minimum}$

Corrosion rate (inches)
Where : t_{actual} = actual measured thickness at the time of the latest inspection
$t_{minimum}$ = minimum required thickness for system pressure
(calculated from applicable piping code)

10. Personnel, Training, and Spill Prevention Procedures (40 CFR 112.7(f))

A. Personnel are properly instructed in the following:

(1) operation and maintenance of equipment to prevent oil discharges, **Yes**

(2) and applicable pollution control laws, rules and regulations. **Yes**

Describe procedures employed for instruction:

All personnel potentially involved with the use of petroleum products are appropriately trained and know to comply with company incident reporting procedures in the event of a spill. Formal training is conducted once a year. New employees are trained by experienced operators prior to assuming duty.

Personnel training includes instruction concerning the proper operation and maintenance of equipment. In particular, this training ensures that all personnel have an adequate understanding of the intent and contents of the SPCC Plan and the spill prevention and response procedures. Employees who are responsible for containing and/or stopping spills have spill response training.

Each employee signs training documentation/sign-off sheets, and a training

file is maintained at the Area Office.

B. Scheduled prevention briefings for the operating personnel are conducted at least annually (40 CFR 112.7(f)(3)). **Yes**

Describe briefing program:

Training also continues on a regular basis through such means as on-the-job training, regularly scheduled operating and safety meetings, when regulations and/or procedures change, and with annual refresher training. A copy of the SPCC Plan is provided in the control room and the office for operator reference. Emergency phone numbers are provided for plant personnel (see Contact List above).

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage (40 CFR 112.8(b) and 112.9(b))

1. Drainage from secondary containment areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.). (Note: Flapper-type valves must not be used):

See attached Data Sheets

For dikes that have drains, accumulated storm water in the diked areas will be removed by opening a secured valve on a pipe through the dike if no oil is present. For dikes that do not have drains, the storm water will be allowed to evaporate, percolate into the soil or be pumped out and disposed of in a permitted facility by a contractor.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

See attached Data Sheets

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of: (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to

Attachment #3):

The presence of hydrocarbons will be identified by the presence of a sheen. Any oil, or water with a sheen of oil, that is collected within a dike, a berm or a low-lying area will be removed by means such as sorbent pads or vacuum trucks to one of the tanks on-site or to a company-approved, permitted disposal facility.

For those dikes or berms that have drains, the rain water drains are kept closed and secured except during drainage of storm water. A record of drainage is kept which shows the time of discharge, presence or absence of a sheen, and personnel performing the discharge. Any drainage of water from the dike or berm to the surrounding countryside is done by an SPCC-trained employee.

B. Bulk Storage Tanks (40 CFR 112.8(c) and 112.9(c))

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection:

See attached Data Sheets

All storage tanks are welded steel, meet API specifications and are surrounded by a containment dike. Each storage tank is equipped with vacuum pressure release valves to prevent collapsing of the tanks due to vacuum while removing liquids.

Tanks are primed and painted to inhibit rust and corrosion. All tank integrity and leak tests performed on tanks and associated piping are maintained at the Area Office.

2. Describe secondary containment design, construction materials, and volume:

See attached Data Sheets

Secondary containment is provided for all storage tanks by containment dikes. The dike dimensions are sufficient containment to impound the capacity of the largest tank plus rainfall, unless otherwise indicated on the site-specific Data Sheets. The SPCC tank dike calculations are attached to the site-specific

Data Sheets.

3. Describe tank inspection methods, procedures, and record keeping:

See Data Sheets, Inspections and Records, Item 9.

4. Internal heating coil leakage is controlled by one or more of the following control factors:

a. Monitoring the steam return or exhaust lines for oil: **N/A**

Describe the monitoring procedure. **N/A**

b. Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. **N/A**

c. Installing external heating systems. **N/A**

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. **N/A**

Describe method and frequency of observation: **N/A**

6. Container engineering to avoid discharges (40 CFR 112.7(c)(8)) – All bulk storage containers are monitored during filling by direct observation by SPCC-trained company personnel.

C. Operating Equipment

See attached **Data Sheets**.

D. Facility Transfer Operations and Pumping (40 CFR 112.8(d))

1. Corrosion protection for buried pipelines:

a. Pipelines are wrapped and coated to reduce corrosion. **See attached Data Sheets**

b. Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. **See attached Data Sheets**

c. When a pipeline section is exposed, it is examined and corrective action taken as necessary. **See attached Data Sheets**

40 CFR Part 280

(b) Piping. The piping that routinely contains regulated substances and is in contact with the ground must be properly designed, constructed, and protected from corrosion in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory as specified below:

(1) The piping is constructed of fiberglass-reinforced plastic; or

Note:

The following codes and standards may be used to comply with paragraph (b)(1) of this section:

(A) Underwriters Laboratories Subject 971, "UL Listed Non-Metal Pipe";

(B) Underwriters Laboratories Standard 567, "Pipe Connectors for Flammable and Combustible and LP Gas";

(C) Underwriters Laboratories of Canada Guide ULC-107, "Glass Fiber Reinforced Plastic Pipe and Fittings for Flammable Liquids"; and

(D) Underwriters Laboratories of Canada Standard CAN 4-S633-M81, "Flexible Underground Hose Connectors."

(2) The piping is constructed of steel and cathodically protected in the following manner:

(i) The piping is coated with a suitable dielectric material;

(ii) Field-installed cathodic protection systems are designed by a corrosion expert;

(iii) Impressed current systems are designed to allow determination of current operating status as required in §280.31(c); and

(iv) Cathodic protection systems are operated and maintained in accordance with §280.31 or guidelines established by the implementing agency; or

Note:

The following codes and standards may be used to comply with paragraph (b)(2) of this section:

(A) National Fire Protection Association Standard 30, "Flammable and Combustible Liquids Code";

(B) American Petroleum Institute Publication 1615, "Installation of Underground Petroleum Storage Systems";

(C) American Petroleum Institute Publication 1632, "Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems"; and

(D) National Association of Corrosion Engineers Standard RP-01-69, "Control of External Corrosion on Submerged Metallic Piping Systems."

(3) The piping is constructed of metal without additional corrosion protection measures provided that:

(i) The piping is installed at a site that is determined by a corrosion expert to not be corrosive enough to cause it to have a release due to corrosion during its operating life; and

(ii) Owners and operators maintain records that demonstrate compliance with the requirements of paragraph (b)(3)(i) of this section for the remaining life of the piping; or

Note:

National Fire Protection Association Standard 30, "Flammable and Combustible Liquids Code"; and National Association of Corrosion Engineers Standard RP-01-69, "Control of External Corrosion on Submerged Metallic Piping Systems," may be used to comply with paragraph (b)(3) of this section.

(4) The piping construction and corrosion protection are determined by the implementing agency to be designed to prevent the release or threatened release of any stored regulated substance in a manner that is no less protective of human health and the environment than the requirements in paragraphs (b) (1) through (3) of this section.

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. **See attached**

Data Sheets

Describe criteria for determining when to cap or blank-flange:
See attached Data Sheets

Product Pipelines are capped or blinded when purged and disconnected from the facility. Marking of in-service lines is done but marking of abandoned lines is not done.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. **See attached Data Sheets**

Describe pipe support design:

ANSI Code B31.3 design is utilized. Pipe supports and pipes are provided with guide shoes and guides to provide for expansion where applicable. Expansion loops are provided on lines where extraordinary expansion and contraction occur. Other piping is held in place by U-bolts or pipe clamps.

4. Describe procedures for regularly examining all above-ground valves and pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces):

Inspections of above-ground valves, flanges and pipelines are made by operating personnel as part of their operating procedure.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping:

Unauthorized access to the facility is limited. Unauthorized vehicles are not allowed in the Facility. Authorized vehicles are either accompanied by plant personnel or directed to drive in specific areas. Barricades are used to protect piping in high traffic areas.

D. Facility Tank Car & Tank Truck Loading/Unloading Rack
Tank car and tank truck unloading occurs at the facility. (If yes, complete 1 through 5 below.)

See attached Data Sheets

1. Unloading procedures meet the minimum requirements and regulations of the

Department of Transportation. **See attached Data Sheets**

2. The unloading area has a quick drainage system. **See attached Data Sheets**

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the plant. **See attached Data Sheets**

Describe containment system design, construction materials, and volume:

See attached Data Sheets

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. **See attached Data Sheets**

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

See attached Data Sheets

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure.

F. Security

1. Plants handling, processing, or storing oil products are fenced. **Yes**

2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. **Yes**

3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. **Yes**

4. Starter controls on all oil product pumps in non-operating or standby status are:

   a. locked in the off position; **No**

   b. located at site accessible only to authorized personnel. **Yes**

5. Discussion of items 1 through 4 as appropriate:

The Facility is remotely operated 24 hours per day. The entrance gate is locked unless personnel are working at the site. Likewise, all storage valves are considered operative 24 hours per day and are not locked.

6. Discussion of lighting around the facility:

The area is adequately lighted such that problems and intruders can easily be detected.

NOT APPLICABLE

SPCC PLAN, ATTACHMENT #1
SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974, into _____ navigable water.)

1. Date_____ Volume _____ Cause:

Corrective action taken:

_____Plans for preventing recurrence:

2. Date_____ Volume _____ Cause:

Corrective action taken:

Plans for preventing recurrence:

SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLANS AND
WRITTEN COMMITMENT OF MANPOWER

Secondary containment or diversionary structures are impracticable for the following reasons (attach additional pages if necessary):

A spill in the unloading areas would be caught immediately since the driver/gauger is in attendance during the entire loading procedure. Since the Facility has control over when unloading may occur, the Facility has adopted a policy that product won't be unloaded in a driving 25-year storm event, when the berm is standing full of rainwater.

The no-spills history of these sites supports the conclusion that safe operating practices are effective at these sites. Potential spills at the loading/unloading areas are addressed by a strong Spill Response Plan. Alleviation of a possible spill relies on experienced and capable operators to prevent premature vehicular departure before disconnection of transfer lines. Drains and outlets on tank trucks are checked for leakage before loading/unloading or departure. Equipment and hoses are inspected for deterioration, frays, leaks, breaks, etc., and qualified personnel are present during loading and unloading to respond to any spill of material. The qualified person ensures that the hand brake is set and that the wheels are chocked. He also ensures that no smoking or other ignition sources are present in the area.

Company personnel have vehicles equipped with two-way radio communication systems, which facilitates proper implementation of the SPCC plan by allowing immediate spill reporting. All Facilities are serviced by an all-weather road whereby ample manpower and equipment may be promptly dispatched to contain or divert any possible oil spill. Equipment and manpower is available within two hours' notice to effectively dam up, divert, and clean up spills that may occur. The names and telephone numbers of contractors with proper spill control equipment are listed on the Contact Sheet above.

A strong oil spill contingency plant is attached?

Spill Response Plan is at the Area Office.

A written commitment of manpower is attached?

Yes, See first page of General SPCC Plan.

EXAMPLE - ONLY

SPCC PLAN, ATTACHMENT #3
ONSHORE FACILITY BULK STORAGE TANKS
DRAINAGE SYSTEM

Inspection Procedure:

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of Drainage	Date of Bypassing		Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature
	Open	Closed			

Saunders - Vada Compressor Station
DATA SHEET

#10

PART I - GENERAL INFORMATION

1. Name of facility: **Saunders - Vada Compressor Station**

2. Type of facility: **Onshore facility – Production Facility**

3. Location of facility: **Approximately 15 miles west of Tatum, NM on U.S. Highway 380, turn north on Nine Mile Ranch Road (south extension is NM 457) to Epperson Road (where pavement ends). Turn right and proceed approximately 3.3 miles to Vada (east side of road). (33°25'57"N/103°32'40.5"W)**

7. Potential Spills -- Prediction & Control (40 CFR 112.7(a)(3)): **See Table 1.**

Discussion:
The map referred to in the Generic SPCC Plan is attached here as Figure 2. (40 CFR 112.7(a)(3)). The facility location map is Figure 1.

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable: **Yes, for tanks.**

9. Inspections and Records

   A. The required inspections follow written procedures. **Yes**

   B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached.

   Written procedures are discussed below. Records of inspections that are signed by the appropriate inspector are attached to this plan (see Table 3) and are contained within the electronic maintenance management system (Maximo).

   Discussion:

   In order to minimize the potential for spills, all areas used for storage of petroleum material will undergo inspection periodically. Periodic inspections are conducted for visual leaks and/or deficiencies and the results are recorded on an inspection log (See Table 3 in this data sheet). All above-ground equipment and facilities as listed are located in such a manner that routine visual checks and maintenance may be performed with little difficulty. All tank levels are gauged prior to pumping product into them. Tanks are visually

monitored as well. Conditions needing maintenance such as leaks or defective conditions are reported to the Asset Office. Applicable repairs are initiated promptly. The procedures are as follows:

A. Tank Inspections - Tank inspections include checks for leaks and spills. Sudden deviations in tank volumes will be investigated and their causes determined.

B. Material Dispensing Equipment Inspections - The dispensing hoses, connections, valves, pumps, pipes, and fittings are inspected for damage or wear, such as cracks or leaks, and proper functioning.

C. Secondary Containment Areas Inspections - Secondary containment areas are inspected for deterioration, cracks, leaks or failure.

In addition to the above, the following are inspected but not recorded on the annual inspection log:

D. Safety Equipment Inspections - Fire extinguishers are checked monthly to ensure that the units are charged and accessible.

Security Inspections - Gates, fences, lighting, and signs are inspected for damage and proper operation.

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage (40 CFR 112.9(b))

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

Drainage from undiked areas generally flows to the southwest. Any oil released to this area will be absorbed with booms or other similar equipment.

B. Bulk Storage Tanks (40CFR 112.9(c))

2. Describe secondary containment design, construction materials, and volume:

All tanks within the facility are located inside concrete, steel or earthen secondary containment structures. Containment structures are generally designed to hold the capacity of the largest tank within the structure plus excess capacity for

rainfall events. Dimensions of all containment structures are listed in Table 1. Capacities of these structures are calculated in Table 2.

All storage tanks that collect condensate from the gas stream are sized such that they will hold an amount great enough to avoid overflow should a pumper be delayed in making their rounds. Additionally, these tanks are regularly checked by Targa personnel who will take action should the tank be nearing capacity. Finally, the condensate (or slop oil) storage tanks at this facility are connected by piping such that all liquid flows into one tank and then overflows into the second, to avoid releases of oil. Other oil storage tanks at the facility are filled by vendors as the need arises. Filling operations are done in the presence of trained personnel who assure that releases will not occur.

C. Operating Equipment

Operating equipment that contains oil at the site consists of engines and gas compressors. These devices are generally located on skids or inside roofed buildings where leaks of oil are collected and routed to the facility drain system. Oil collected in the facility drain system is routed to one or more slop oil storage tanks for storage prior to pickup and removal from the site.

D. Facility Transfer Operations and Pumping (40 CFR 112.8(d))

1. Corrosion protection for buried pipelines:

a. Pipelines are wrapped and coated to reduce corrosion. **Yes**

b. Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. **Yes**

c. When a pipeline section is exposed, it is examined and corrective action taken as necessary. **Yes**

D. Facility Tank Car & Tank Truck Unloading Rack
Tank car and tank truck unloading occurs at the facility. **Yes**

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation **Yes**

2. The unloading area has a quick drainage system. **No**

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the Facility: **No**

Describe containment system design, construction materials, and volume:

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines (40CFR 112.7(h)). **Yes, signs are provided at each facility and contractors are required to follow the following procedure.**

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

- Contractors are responsible for wearing appropriate Personal Protective Equipment (PPE) required by facility (hard hat, safety glasses, fire retardant clothing, work boots, gloves). If driver is unfamiliar with the product being loaded, obtain a Material Safety Data Sheet (MSDS) from Targa.
- Truck driver to call local Targa personnel before beginning loading/unloading operation described below if applicable.
- With truck shut down unless utilizing PTO, driver will attach ground cable and chock wheels.
- Driver will visually inspect hoses for cracks or defects. If no defects are noted, driver will attach hoses and assure that connections are secure.
- Record beginning tank level prior to loading or unloading.
- Remove padlocks from valves where applicable.
- Open valves required to load or unload.
  After loading/unloading is complete record tank level and reverse the procedure above.
- Driver to fill out appropriate DOT paperwork and provide receipt ticket/copy of paperwork to Targa.
- If a spill occurs during the loading/unloading operation, call the local Targa representative immediately at the emergency number shown on the facility sign.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure. **Yes**

Attachments:
Location Map – Figure 1
Site Plan – Figure 2
Table 1 – Potential Spills – Prediction and Control
Figures 3 - 11 (Facility photographs)
Applicability of the Substantial Harm Criteria
Table 2 - Dike Calculations.
Table 3 - Bulk Storage Container Inspection Log

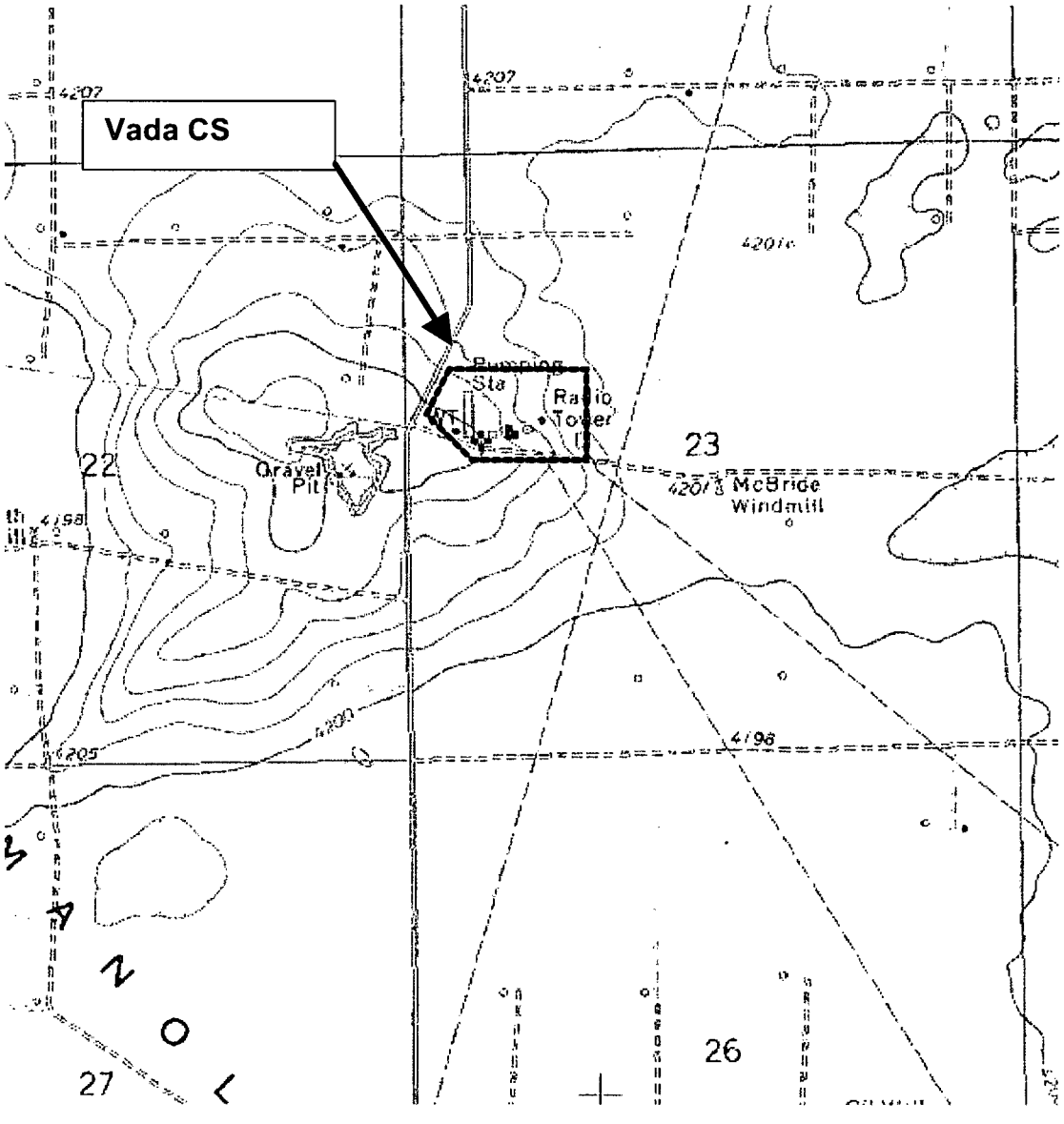


FIGURE 1

Vada Compressor Station
Location Map

(USGS *Lane Salt Lake*, NM Quad (1982))
Scale: 1:24,000

#5

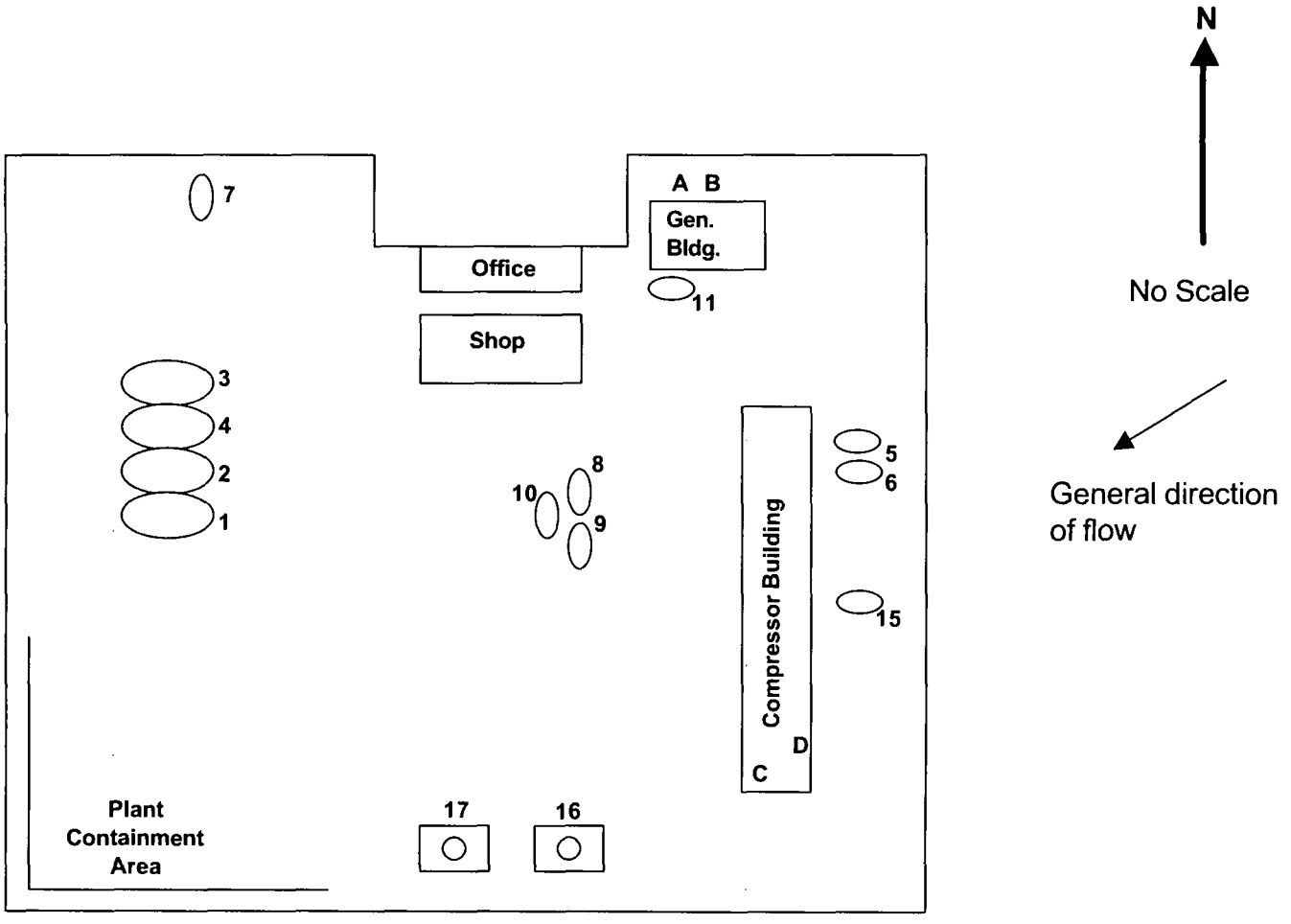


Figure 2
Saunders – Vada Compressor Station
Site Plan

Table 1
Potential Spills – Prediction and Control

Vessel Number	Contents	Major Type of Failure	Total Quantity (gal)	Maximum Flow Rate (gpm)	Direction of Flow	Secondary Containment	Figure No.
1	Condensate	Overfill / rupture	34,261		SW	Plant containment area 300' x 126' x 1'6"	3
2	Condensate	Overfill / rupture	34,261		SW	Plant containment area 300' x 126' x 1'6"	3
3	Condensate	Overfill / rupture	34,261		SW	Plant containment area 300' x 126' x 1'6"	3
4	Condensate	Overfill / rupture	34,261		SW	Plant containment area 300' x 126' x 1'6"	3
5	Engine oil	Overfill / rupture	8,200		SW	Plant containment area 300' x 126' x 1'6"	4
7	Gasoline	Overfill / rupture	2,100		SW	Plant containment area 300' x 126' x 1'6"	5
16	Slop oil	Overfill / rupture	8,820		SW	Earth berm 36' x 40' x 3'	6
17	Used lube oil	Overfill / rupture	6,300		SW	Earth berm 33' x 36' x 1'6"	7
A	Ingersoll Rand PVG	Pressure release	90		SW	Plant drain system	8
B	Ingersoll Rand PVG	Pressure release	90		SW	Plant drain system	9
C	Cooper Bessemer GMW8	Pressure release	250		SW	Plant drain system	10
D	Cooper Bessemer GMW8	Pressure release	250		SW	Plant drain system	11

9#

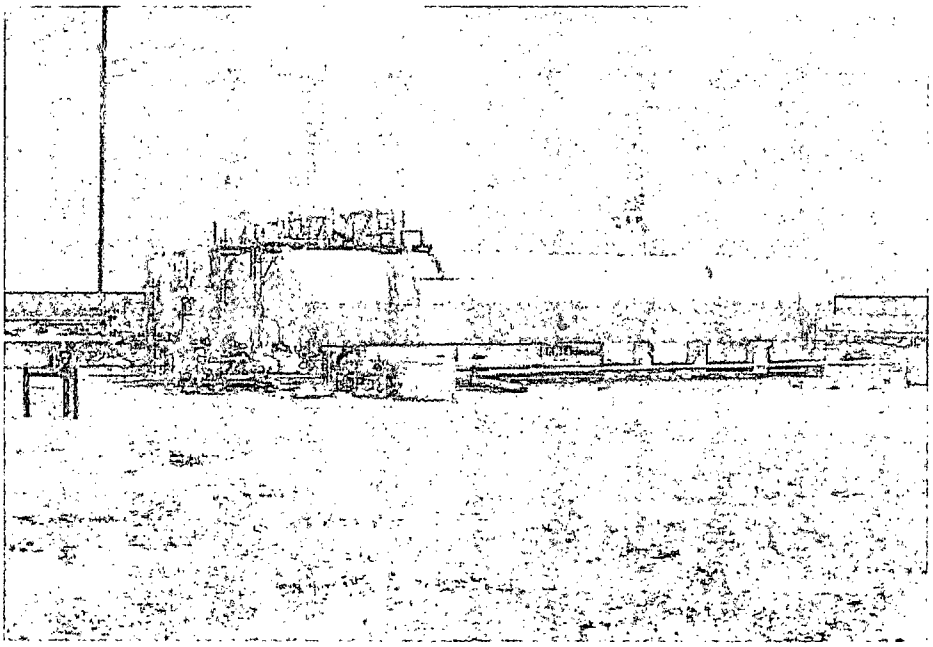


Figure 3 – Condensate tanks

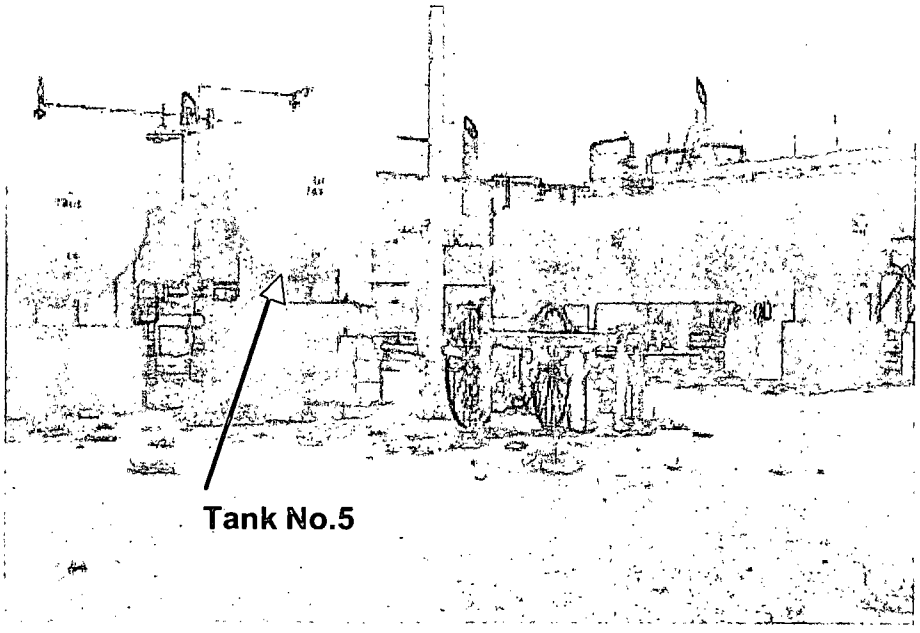


Figure 4 – Engine Oil (two left) and Cooling Water Tanks

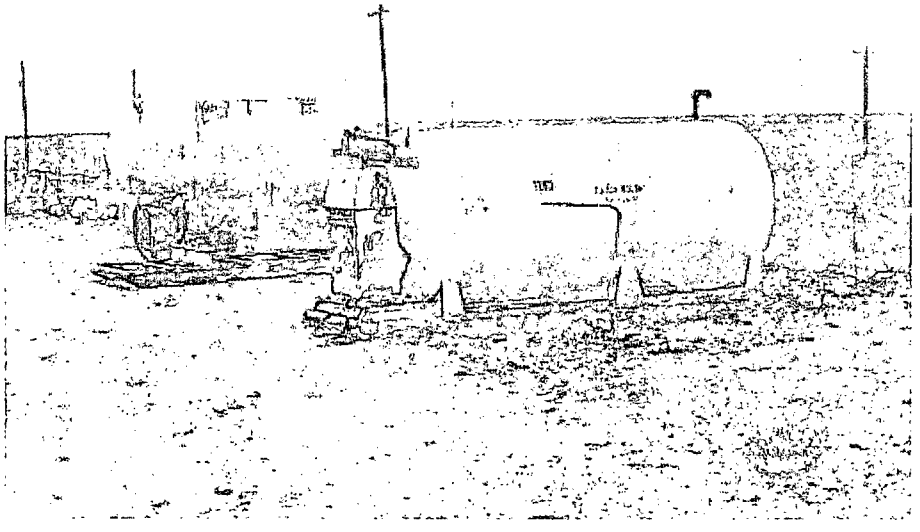


Figure 5 – Gasoline and Propane Tanks

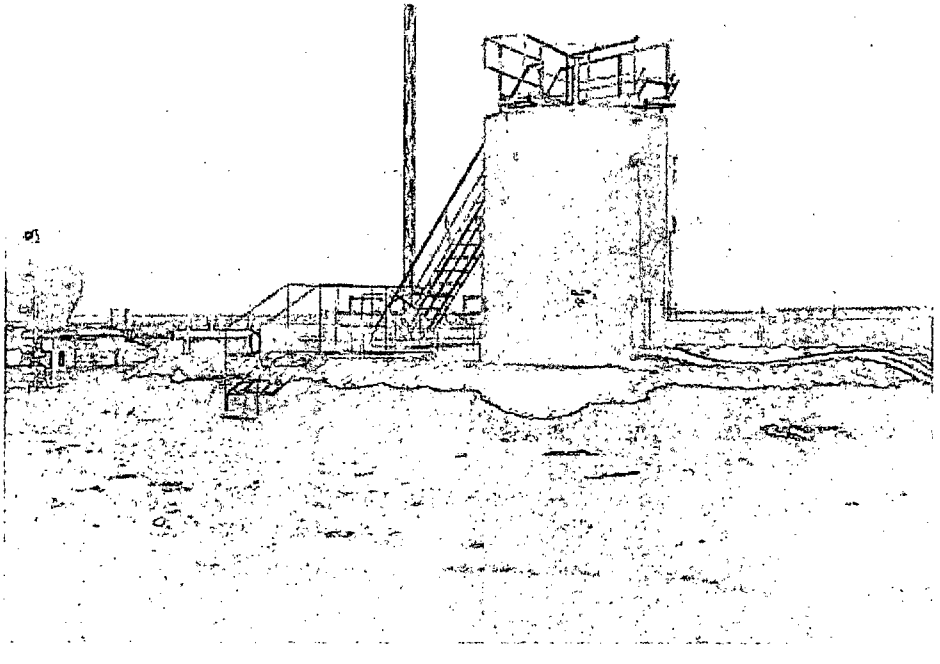


Figure 6 – Tank No. 16

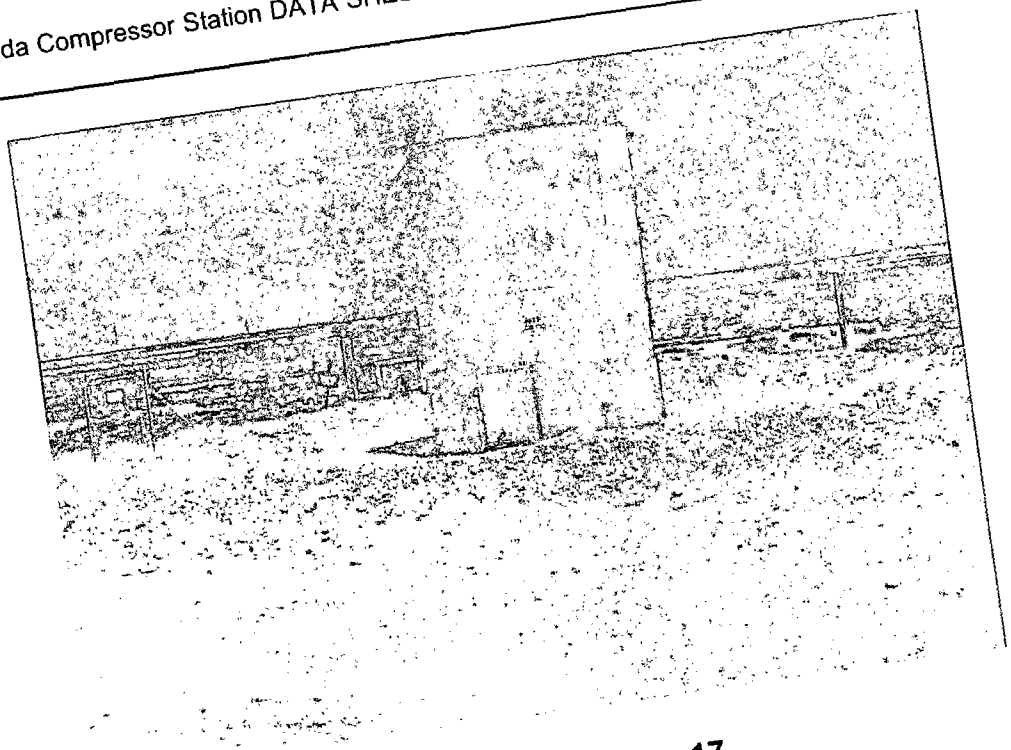


Figure 7 – Tank No. 17

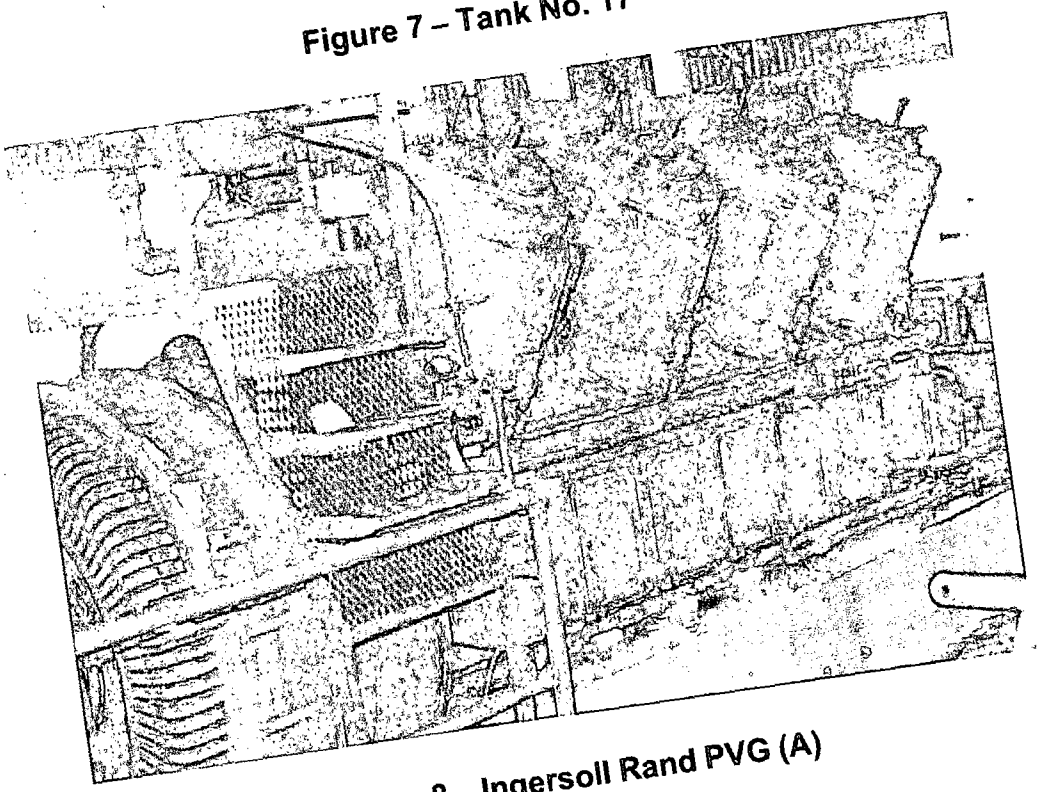


Figure 8 – Ingersoll Rand PVG (A)

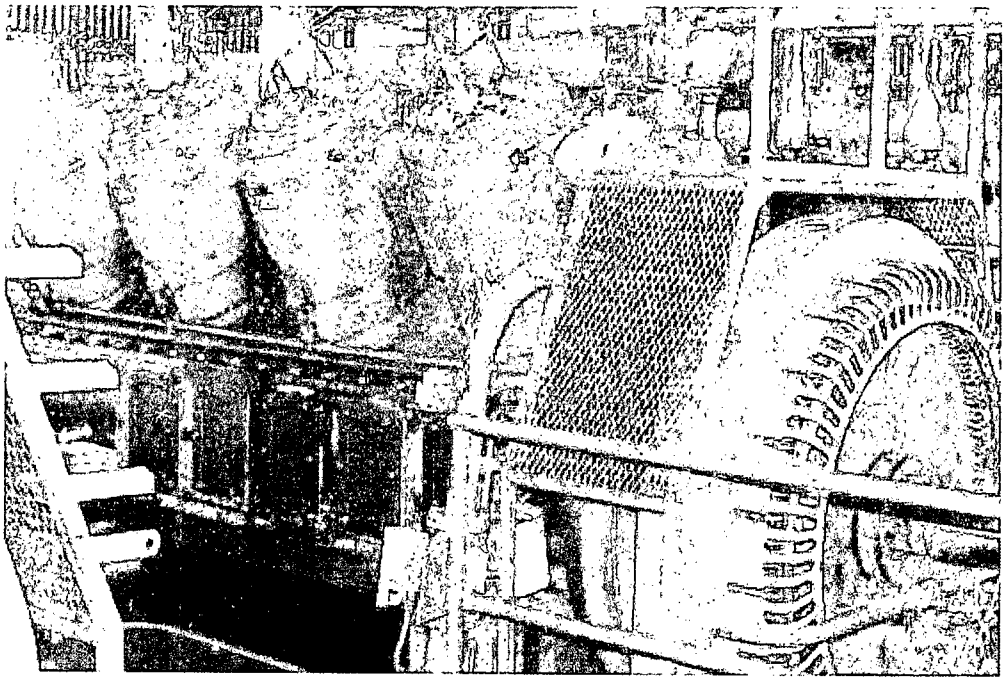


Figure 9 – Ingersoll Rand PVG (B)

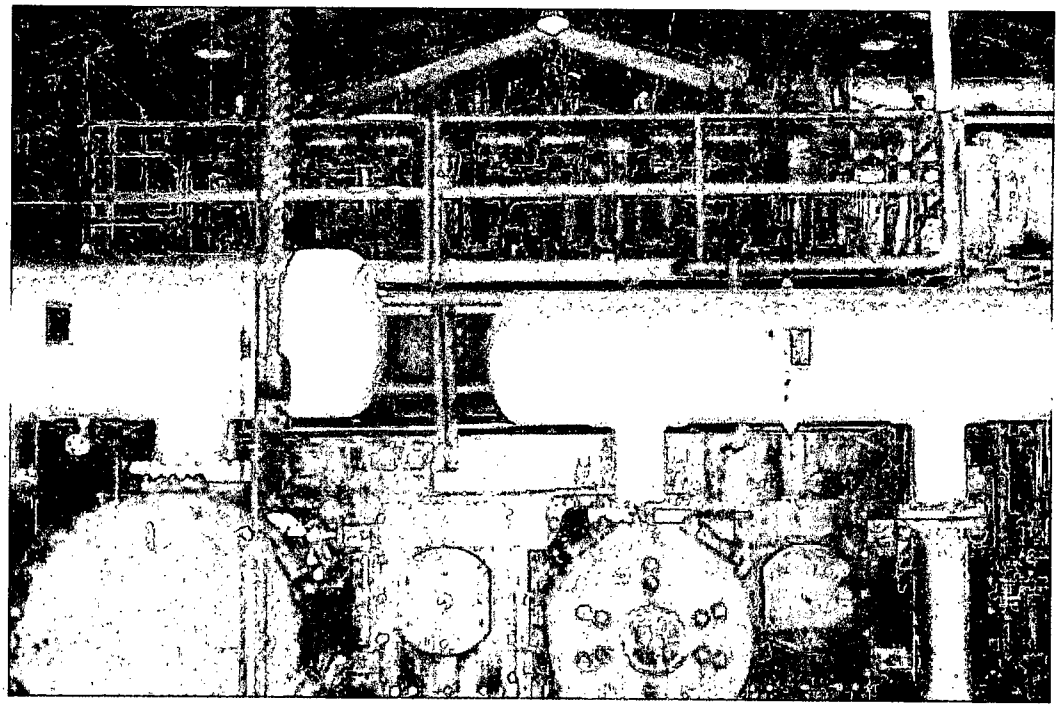


Figure 10 Coooper Bessemer GMW8 (C)

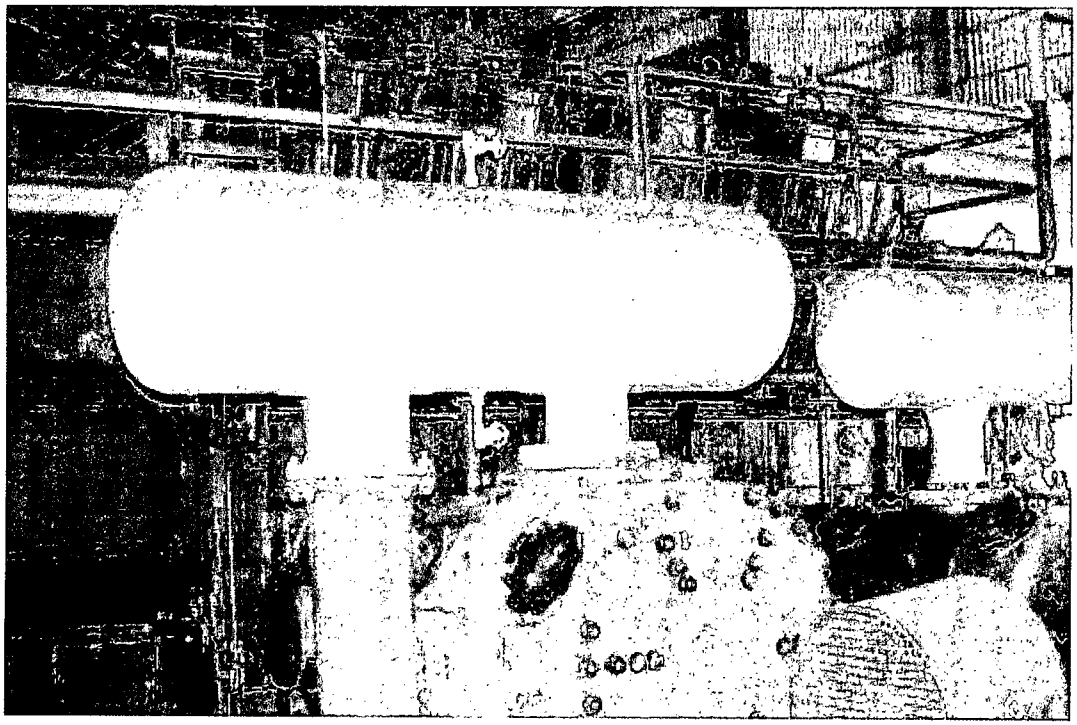


Figure 11 – Cooper Bessemer GMW8

Applicability of Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? **No**

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? **No**

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

Table 2
Dike Calculations
Saunders - Vada

Tank / Dike Combination	Dike Full Storage Volume (see Table 1 for dimensions), gal.	Largest Tank capacity (gal)	Available Dike Full Precipitation Storage (in.)
1-10	424,100	34,261	16.5
16	32,313	8,820	26.1
17	13,329	6,300	9.4

Table 3
Bulk Storage Container Inspection Log

Vessel and Containment	Contents	Inspection Date	Result	Inspector	Inspection Date	Result	Inspector
1	Condensate						
2	Condensate						
3	Condensate						
4	Condensate						
5	Engine oil						
7	Gasoline						
16	Slop oil						
17	Used lube oil						

Note: Reproduce this sheet as needed to keep a record of all visual inspections of the listed oil containers at the site. Retain the records with the hard copy of the plan. Keep the records with the plan for the past five years' inspections.

Visually inspect all listed tanks and their associated containment structures

SECTION 6

WASTE MANAGEMENT PLAN

TABLE OF CONTENTS

Targa Midstream Services LP

New Mexico Waste Management Plan

PURPOSE AND SCOPE

The management of wastes generated at gas processing facilities has become increasingly complex; new regulations are promulgated so quickly it is practically impossible to keep up with them. Waste handling and disposal techniques that were acceptable yesterday are no longer allowed today. Facility personnel must comply with a myriad of agency notifications, testing requirements and recordkeeping requirements. This waste management plan is designed to provide guidance in the management of wastes generated at the facility by ensuring their proper storage, transportation, and disposal. Specifically, this plan will provide the following information:

- Waste identification, classification, handling, and disposition.
- Waste minimization and elimination alternatives.
- Information on applicable shipping requirements under the Department of Transportation
- Examples of forms and letters necessary for disposal and reporting requirements.
- Data on how each facility is managing waste and the associated costs.

This information will make it possible to meet the following goals:

- Facilitate proper waste identification and management by plant personnel.
- Involve plant personnel in identifying ways to reduce waste generation.
- Comply with regulatory requirements for developing and implementing a plan to minimize waste generation.
- Increase awareness and provide training to plant personnel.
- Provide a means for inter-facility communication and transfer of technology.

The scope of this plan covers all wastes generated at the facility which meet the Resource Conservation and Recovery Act (RCRA) definition of a "solid waste" and does not include the following:

- Wastes which are discharged into and remain as part of the atmosphere (i.e., fired equipment exhaust, relief valve discharges, flare emissions, incinerator emissions, etc...).

- Wastes which are discharged through an effluent system which is covered under an NPDES or State permit (i.e., boiler and/or cooling tower blowdown, sewage treatment facility effluent, stormwater runoff, etc...).

WASTE MINIMIZATION

The primary emphasis of this Plan is on waste minimization; the reasons for this emphasis are:

1. A congressional mandate,
2. Savings to the company, and
3. Reduction in environmental liability.

Minimization is defined by the U. S. Environmental Protection Agency (EPA) as "the reduction, to the extent feasible, of waste generated prior to treatment." Congress established a national policy declaring the importance of reducing or eliminating the volume of hazardous waste generated as soon as possible. **As a result, industry is required by law to develop waste management plans and reduce the volume of waste generated each year (54 FR 25056-25057).** A second reason for emphasizing waste reduction is the savings to the company. By eliminating a waste stream, it is no longer necessary to

devote resources to the handling, storage, analysis, and disposal of that waste stream. Finally, the environmental liability that a company sustains is reduced each time a waste stream is eliminated.

Corporate policy on waste management options is, by order of preference,

1. reduction,
2. recycle/reuse,
3. treatment (including disposal).

Therefore, plant personnel should continually try to identify and evaluate possible waste management alternatives. Information can be obtained from a variety of sources including trade associations (such as the Gas Processors Association), published literature (from the American Petroleum Institute or industry publications), state and federal environmental agencies, and company personnel. Waste minimization may be something as simple as proper maintenance and operation of equipment to prevent generation of excessive volumes of waste, or using corrosion inhibitors in cooling tower water that do not contain chromium.

RECYCLING & REUSE

In situations where waste elimination or reduction may not be possible, recycling or reusing a material is the next alternative. If a material can be used more than once, the overall volume of material purchased and waste generated is reduced as well as disposal costs. Additionally, some states such as Louisiana require certain wastes be recycled instead of disposed. Finally, the following recyclable materials are excluded from hazardous waste regulation:

- Used oil that is recycled in some other way than burning for energy recovery.
- Scrap metal.
- Used batteries returned for regeneration.
- Materials used or reused as ingredients to make a product.
- Wastes used or reused as effective substitutes for chemical products.
- Wastes returned to the original process from which they were generated.

The latter three are excluded only if the wastes are not reclaimed or treated before reusing (such as distillation, ion exchange, dewatering). A complete guide on recycling can be found in Section 14, How to Recognize a Hazardous Waste.

WHAT IS A SOLID WASTE?

The Solid Waste Disposal Act (SWDA) was enacted in 1965 to regulate the disposal of solid waste primarily at municipal landfills. The SWDA was amended in 1976 by the Resource Conservation and Recovery Act (RCRA) to include more stringent regulations of solid waste and a "cradle to grave" regulation of hazardous waste. Hazardous waste is monitored from the point of generation, through storage, transportation, and final disposal. However, the fundamental principle behind RCRA, as indicated in its title, is to minimize the volume of hazardous waste generated through elimination, reduction, or recycling and reuse of solid and hazardous waste and to avoid land disposal of wastes whenever possible. In an effort to promote waste reduction, land disposal restrictions were authorized when RCRA was amended in 1984. In order to understand the solid and hazardous waste programs some critical definitions must be understood.

A solid waste includes *garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, air pollution control facility, and other* ***discarded*** *material including solid, liquid, semi-solid, or contained gaseous materials, resulting from industrial, commercial, mining and agriculture activities, and from community activities with the exception of domestic sewage, irrigation return flows, or industrial discharges permitted under the Clean Water Act (Title 40 of the Code of Federal Regulations Part 261.2 (40 CFR 261.2)).* A material must first be discarded to become a waste. **Discarded** is defined as "*any material which is disposed, abandoned, recycled or considered inherently waste-like (40 CFR 261.2(a)(2))*." Several categories of materials are exempt from regulation as solid waste. Two of these exemptions important to the gas processing industry include:

- Industrial wastewater discharges permitted under the Clean Water Act.
- Secondary materials that are reclaimed and returned to the original process from which they were generated.

WHAT IS A HAZARDOUS WASTE?

Hazardous waste is actually a subset of solid waste; discarded material cannot be a hazardous waste unless it first fits the definition of a solid waste. There are two types of hazardous waste as defined in RCRA (40 CFR 261.3), 1) characteristically hazardous, and 2) listed hazardous wastes. Wastes that are characteristically hazardous exhibit one of the following four characteristics: ignitability, corrosivity, reactivity, or toxicity. An ignitible waste is any solid, liquid or compressed gas with a flashpoint less than 140° F such as Varsol (40 CFR 261.21). A corrosive waste is any liquid that has a pH less than or equal to 2, or greater than or equal to 12.5 such as spent acid or spent caustic (40 CFR 261.22). Reactive wastes are those that are normally unstable, react violently with water (sometimes releasing hydrogen sulfide (H_2S) or cyanide (CN), if present in the waste, as gases), form potentially explosive mixtures with water, are capable of detonation or explosion reaction if subjected to a strong initiating source or heated under confinement, capable of detonation or explosive decomposition or reaction at standard temperature and pressure, or meets the DOT definition of forbidden explosive (40 CFR 261.23). Cooling tower sludge might be a reactive waste due to its potential to contain hydrogen sulfide. Toxic wastes contain concentrations of regulated metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), organic compounds (26 compounds including benzene and trichloroethylene), and insecticides/herbicides above allowable limits (40 CFR 261.24). For example, soil in meter sheds are sometimes toxic due to elevated concentrations of mercury.

Listed wastes are those which have been identified as "typically or frequently" hazardous because they exhibit a characteristic or they threaten human health or the environment. Listed wastes include material used in non-specific sources such as spent solvents (40 CFR 261.31), from specific processes such as API separator sludge from refining (40 CFR 261.32), commercial chemical products that are off-specification species, or are container or spill residues such as methanol (40 CFR 261.33).

As with the definition of a solid waste there are several exemptions to the definition of hazardous waste. Among the several categories of exempt waste are two that are particularly important, the exclusion of household waste, and the exclusion of drilling fluids, produced waters, and other wastes associated with the exploration, development, and production of crude oil, natural gas, or geothermal energy (known as the petroleum exclusion). The exemption is important because it explicitly states that certain wastes unique to the exploration and production of natural gas and oil are exempt from consideration as a hazardous waste. Therefore, the wastes do not have to be tested to determine if they are hazardous and they can be handled as a solid waste. Many states including Louisiana and Oklahoma have put some limits on the full interpretation of this exemption. In these states, the environmental agencies require these wastes to be tested before they can be disposed in a landfill permitted by that agency. The benefit of this exemption is evident in the disposal of aqueous wastes such as spent amine or cooling tower

blowdown in a Class II disposal well. Because of the complexities, it is important to review the exemption and state requirements (review the memorandum of understanding between the agencies). A copy of the book How to Recognize A Hazardous Waste (Even If Its Wearing Dark Sunglasses) has been included in Section 14 as an additional resource. The book provides an complete analysis of the hazardous waste regulations.

WHO IS A GENERATOR OF HAZARDOUS WASTE?

A generator is "any person, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation." There are three types of generators of hazardous waste; each category is defined by the quantity of waste generated and has specific requirements that must be met (40 CFR 262).

A large quantity generator (LQG) produces more than 1,000 kilograms per month (kg/mo), or 2200 pounds per month (lbs/mo), of hazardous waste. Large quantity generators must comply with the following requirements:

- Obtain an EPA Identification number.
- Store waste onsite for no more than 90 days.
- Manifest the transport and disposal of each waste shipment and comply with all Department of Transportation (DOT) shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide complete training for personnel handling wastes.
- Maintain a complete contingency plan.
- Comply with reporting and recordkeeping requirements.

A generator that produces more than 100 kg/mo, or 220 lbs/mo but less than 1,000 kg/mo of hazardous waste is defined as a small quantity generator (SQG). Generators in this category must comply with the following requirements:

- Obtain an EPA Identification number.
- Store no more than 6,000 kg (132,000 lbs) onsite at any time for up to 180 days or up to 270 days if the disposal site is more than 200 miles away.
- Manifest the transport and disposal of each waste shipment and comply with DOT shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide basic training for personnel.
- Maintain a basic contingency plan.

A conditionally exempt small quantity generator (CESQG) produces no more than 100 kg/mo (220 lbs/mo) of hazardous waste or no more than 1 kg/mo (2.2 lbs/mo) of acutely hazardous waste and accumulates no more than 1,000 kg of hazardous waste on site at one time. Conditionally exempt generator's hazardous wastes are not subject to many of the requirements that larger generators must meet. They do not have to obtain an EPA Identification number (although most transporters and disposers will not accept waste without a number), manifest waste shipments, provide training to personnel, maintain contingency plans, or comply with storage requirements. However, they must send their hazardous wastes to disposal facilities authorized to accept that waste (40 CFR 261.5). Generators producing less than 100 kg/mo in Louisiana are termed Small Quantity Generators and are required to

use shipping manifests, comply with recordkeeping and reporting requirements. Texas, Oklahoma, and New Mexico follow the federal program for CESQGs.

STORAGE PRACTICES

Facilities which store waste prior to disposal should follow a few simple best management practices to ensure wastes are stored in an appropriate manner. Following these practices can also reduce environmental liability caused by spills or leaks from storage containers. These practices include the following:

- Store wastes in containers or tanks that are in good condition.
- Containers should be compatible with the material being stored in them.
- Containers should be stored in covered areas and on impermeable surfaces whenever possible.
- Containers should be always be closed unless the contents are being transferred.
- Always label containers, identifying the contents and the start date of accumulation.
- Never allow accumulation of waste onsite longer than is absolutely necessary.
- Inspect storage areas and containers periodically (at least weekly for LQG and SQG) to ensure they are not leaking.
- Replace or repair immediately any container that is leaking.

RECORDKEEPING

Facilities that generate both hazardous and nonhazardous waste should always maintain records that document waste management practices at their facility. Maintaining copies of records serves four purposes. First, large and small quantity generators are required by regulation, for example, to keep copies of manifests for three years. Second, a generator, whether a CESQG or LQG, must maintain copies of records to document compliance with regulations such as waste analysis, classification, storage, transportation, and disposal practices. These records can be requested by a regulatory agency for review when conducting an inspection of the facility. Third, generators may be subject to monthly, quarterly, or annual reporting requirements including information such as type and volume of waste generated, the transporter, and treatment, storage, or disposal site must be provided to state or federal regulatory agencies. Fourth, maintenance of records can help to determine how effectively the goals of the waste management plan are met. The type of records that should be retained include the type and quantity of waste generated; waste manifests, bills of lading, or run tickets; names, addresses, and contact person for transporters and disposers; any results of waste analysis including how and where samples were collected. It is the responsibility of the generator to be sure that transporters and treatment storage and disposal facilities utilized are registered or certified with the appropriate state and/or federal agencies for those activities. This can minimize the possibility of illegal disposition of wastes generated from the facility.

WASTE SAMPLING AND ANALYTICAL PROCEDURES

The majority of states require that facilities sample and analyze some or all wastes generated at a facility. Different states have different requirements on the number and type of samples that must be collected as well as which specific analytical procedures should be used.

Before collecting samples it is important to ask a few basic questions. What parameters am I trying to analyze? What type and quantity of sample do I need? How and where do I collect the sample? What

type of analytical procedure will I use? The answers to these questions will determine how the samples are collected, preserved, and how quickly they must be analyzed. **It is important to coordinate sampling activities with a laboratory prior to sample collection.** Laboratory personnel can provide assistance with these questions and others. They can also provide the proper sample and shipping containers.

When collecting samples, the facility should always follow proper sampling procedures. Always clean and rinse the sampling equipment between sampling locations to prevent cross-contamination of one sample by another. Always place samples in a clean sample containers. Take great care when packing samples for shipment to the laboratory so that containers are not broken or punctured. Always document the sample locations in a field notebook, and be sure to label the sample containers with the sample identification, the time and date collected, and specify the analytical method to be used. Proper chain-of-custody procedures should be followed to be sure samples have not been tampered with while in transit from the plant to the laboratory. If samples are not handled properly, inaccurate analytical data can be the result.

The Environmental Protection Agency has outlined specific analytical procedures that should be performed when testing for specific compounds in SW-846 Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods. Each analytical test method has been assigned a test number which identifies the specific procedure to be used. In many cases, more than one test method can be used to analyze the same compound. For example, total petroleum hydrocarbons can be analyzed using Method 418.1 or Method 8015 Modified. Therefore, it is important to specify the correct analytical method. The specific test methods necessary for testing wastes are included on the Waste Identification Sheets (Section 5).

WASTE MANAGEMENT AND CLASSIFICATION

Waste Classification

The Hazardous Waste Management System was promulgated by the EPA in response to requirements levied by the Resource Conservation and Recovery Act (RCRA). This act, as codified in 40 CFR, lists those substances considered as hazardous. It provides lists of chemicals, pollutants, wastes and the like that are to be monitored, reported, controlled, or eliminated, if present in the workplace or the general environment. There is not an all encompassing list that can be used. The Environmental Department does monitor the lists published by the EPA and the hazardous materials as identified in Material Safety Data Sheets (MSDS) received from chemical manufacturers and distributors used by NGC Warren.

Before disposing of used chemicals, solvents, filters, drums, or other solid or liquid wastes, check to be certain that it is not a listed substance or that the MSDS received on the substance does not identify it as hazardous due to its characteristics. Contact the Environmental Department if you are unsure of the category of the waste or if you do not know what the substance is. If you do not recognize the term SQG, you are not alone in that regard. Many firms that generate hazardous waste are not familiar with this term. The law that gave rise to the term, or the multitude of requirements that the government imposes on generators of small quantities of hazardous waste.

Small Quantity Generators

SQG's generate between 100 and 1,000 kilograms (kg) of hazardous waste in any calendar month, which translates to between 220 and 2,200 pounds. That's roughly equivalent to between one-half and five 55-gallon drums, or between 25 and 300 gallons. That amount of hazardous waste monthly is the federal government's definition of a small quantity generator (SQG). Many states' definitions of the SQG are even more restrictive, which is why we have included as much state-specific regulatory information as is practically possible.

Defining a Hazardous Waste

It's likely that your facility uses hazardous chemicals of some kind often easily identified Hazardous as such because the vendors selling them also supply the chemicals' material safety data sheets (MSDSs).

Operations involving such chemicals often result in wastes such as spent chemicals, stained rags, or contaminated filters. When those wastes pose a potential danger to the environment or human health and life, they are considered hazardous wastes.

The regulations focus on four specific dangers. These are:

1. **Ignitability** - the property of being easily set aflame by nearby heat sources;

2. **Corrosiveness** - the capability to bum eyes or skin on contact;

3. **Reactivity** - the tendency for a substance to explode or otherwise react violently if exposed to air, water, or other common substances; and

4. **Toxicity** - meaning poisonous if taken into the body.

Wastes are considered hazardous if they exhibit any of these characteristics or if they appear on certain government lists.

Because they are hazardous, these wastes must be accounted for, constantly tracked and reported on, and handled with "kid gloves," from "cradle to grave" from the point of generation to the moment they are incinerated, treated, recycled, or landfilled.

The law that governs this "cradle-to-grave" tracking system and that imposes requirements on businesses, large and small alike, is called the Resource Conservation and Recovery Act (RCRA). This is also the law under which the category of "small-quantity generator" was created.

To find out if you are subject to the provisions of RCRA, you need to:

Start With The Right Question

Under RCRA, firms whose operations create hazardous waste are classified as one of three types of "generators"— based on the quantity of waste they generate.

The federal government's categories are:

1. Conditionally exempt generator,
2. Small-quantity generator, and
3. Large-quantity generator.

Again, some states have their own categories.

To determine which category of hazardous waste generator your facility falls into and what requirements you must meet you must answer two questions:

1. Is the waste you generate hazardous, under the law? and
2. Knowing the amount of hazardous waste you generate, which of the three compliance categories describes your business?

In determining the amount of hazardous waste generated, it is easy to become confused because the law defines quantity limits expressed in pounds or kilograms, while companies measure their waste in terms of gallons or gallon-rated containers, e.g., drums.The following chart helps you visualize how much waste we are talking about.

Conversion Chart

KILOGRAMS	POUNDS	GALLONS	55 GAL.
100 kilograms	220 pounds	30 gallons	one-half
1,000 kilograms	2,200 pounds	300 gallons	five
6,000 kilograms	13,200 pounds	1,800 gallons	thirty

If You're Unsure if Your Waste is Hazardous

The critical decision of whether your waste is hazardous is based on your special knowledge of the waste. Some wastes such as certain spent solvents are easily classified as hazardous. Yet, other wastes such as solvents that are not readily flammable, oils that may be contaminated with toxic metals, or chemical by-products may have to be tested to determine if they are hazardous.

Generator Responsibilities

It's important to note that under the law, you are presumed to know what your waste contains and are able to support any conclusions you reach. The generator category into which you fall is based on your adding up the weight of all the hazardous wastes your facility generates during the month. The compliance requirements vary markedly depending on how much waste you generate.

Note at this point, however, that the following *are federal* RCRA requirements. Some state requirements vary.

Conditionally Exempt Compliance Requirements (0- 100 kg/month)

The government recognizes that generators of very low quantities of hazardous waste are often smaller firms with limited resources. They have therefore allowed firms that generate between 0 and 100 kg (0 to 220 pounds) of hazardous waste per month to be "conditionally exempt" from certain federal regulations governing hazardous waste disposal, if they fulfill the following requirements:

- Fully identify all hazardous waste they generate;
- Send their waste to a waste facility approved by the state or RCRA-authorized facility; and
- Never accumulate more than 1,000 kg (2,200 pounds) of hazardous waste at any single time.

SQG Compliance Requirements (100-1,000 kg/month)

Those firms that generate between 100 and 1,000 kg (220 and 2,200 pounds) of hazardous waste, however, come under additional regulation by the EPA. Under the federal law, SQGs must:

- Fully identify all hazardous waste they generate;
- Obtain a U. S. EPA Identification Number,
- Send their waste to a hazardous waste facility, or other facility approved by the EPA or state to receive such waste;
- Use a hazardous waste manifest form when shipping waste off-site;
- Offer waste only to a hazardous waste transporter that has a U.S. EPA Transporter Identification Number,
- Comply with applicable Department of Transportation (DOT) requirements for shipping wastes off-site;

- Accumulate waste on-site for no more than 180 days, or 270 days if the waste is being shipped more than 200 miles—unless a hazardous waste storage permit is obtained;

- Never accumulate more than 13,200 lbs (expressed as 6,000 kg in the law) of hazardous waste at any single time; and

- Comply with emergency preparedness requirements.

Large-Quantity Generator Compliance Requirements

The requirements are most stringent if you are a "large-quantity" generator. For those facilities generating greater than 1,000 kg (2,200 pounds or 300 gallons) of hazardous waste per month, you must also:

- Certify on the manifest form that you have a program in place to minimize the volume and toxicity of your hazardous wastes;

- Accumulate waste on-site for no more than 90 days, unless a hazardous waste storage permit is obtained;

- File a biennial report with the EPA and an annual report with the state environmental agency, if applicable;

- Comply with annual RCRA training requirements; and

- Develop and maintain an emergency response "contingency plan."

Under the law any facility that produces or manages a waste must evaluate that waste to determine if It s hazardous.

Are your Wastes Hazardous?

The law's definition of the term "hazardous waste" is quite specific and can be boiled down to one key definition and four words:

A hazardous waste is a discarded substance that is either:

(1) ignitable, (2) corrosive, (3) reactive, or (4) *toxic.*

For example, a hazardous waste can be a solid, liquid, or containerized gas. "Discarded" may mean land-disposed, incinerated, burned, recycled, and even stored. The potential universe of hazardous wastes is limitless. Some substances are mentioned by chemical name. Most are not. Unnamed wastes, such as "spent solvents, "sludges," and "by-products," for example, that exhibit

one of the four hazard characteristics mentioned above, are regulated as hazardous.

First, though, you need to thoroughly understand the issues involved with hazardous waste determination.

Here's the logic you should follow in building that understanding:

- Are You a Typical SQG?
- Have You Conducted a Waste Inventory?
- Have You Assembled Raw Material Data?
- What Exemptions are Available?
- Is the Waste Listed?
- Does the Waste Exhibit a Hazardous Characteristic?
- Are You Obeying all the Rules?

Question 1: Have You Conducted a Waste Inventory?

For most SQGs, the easiest inventory approach is to ask production and maintenance personnel about wastes, tour your production and nonproduction areas, and inspect storage areas and dumpsters.

It is important to identify: (1) what wastes you generate, (2) the quantity you generate, and, ultimately, (3) how you discard the wastes.

To help you to inventory your wastes, use the form found in Section 8 of this manual and list your wastes by name and quantity:

You can then proceed to determine what wastes on the list are hazardous.

Question 2: Have You Assembled Data on Your Raw Materials?

Since wastes usually begin with the raw materials you use, information on those materials will greatly assist you in understanding whether your wastes are hazardous.

Often, the right phone call or a look at the appropriate information sheet may rule out the need to have your wastes analyzed by a laboratory. If the raw material was considered a hazardous substance, the waste it creates will likely be so as well. Hazardous waste characterization information may be available from your trade association, your chemical vendor, or your waste hauler.

Such information may also be available on the material safety data sheets that came with many of the materials. You should receive (or you must generate if you are a chemical manufacturer) and

keep on file an MSDS for every chemical product that you have on your premises for commercial use.

These sheets are invaluable in providing information about the physical, chemical, and toxic properties of the material.

An MSDS can greatly simplify the process of identifying the characteristics of your chemical waste. It can also save you money by eliminating the need for expensive first-time chemical analysis. Be forewarned, however, that you must always scrutinize any MSDS, making sure that the information it contains is accurate and sufficiently detailed. If there is any question, call the supplier listed on the sheet.

At a minimum, an MSDS will give you information on the hazards or risks associated with the hazardous substance. This includes: (a) the potential for, explosion, corrosivity, and reactivity; (b) the acute and chronic health effects resulting from exposure, including any medical conditions that might be aggravated by exposure; (c) the potential routes of exposure via skin, inhalation, ingestion, etc. and (d) the symptoms of overexposure.

The MSDS will also provide a description of the specific potential health risks posed by a hazardous substance. This includes, but is not limited to, carcinogenic (cancer-causing), mutagenic (mutationcausing), teratogenic (fetus-damaging), or neurotoxic (nerve-damaging) effects.

If your waste stream is relatively simple, an MSDS may provide you with all the information you need to determine whether your chemical waste is hazardous.

Some waste cannot be evaluated using MSDSs. Short of expensive laboratory analysis, there are additional ways to determine if your waste is hazardous.

Question 3: What Are the Eligible Exemptions?

First, you need to see if your waste stream may be among a group of substances that are totally excluded from the regulations. Although we have not listed all the exclusions here, those that may be pertinent to SQGs include:

- Household refuse;
- Unusable paper, cardboard, and plastic scrap;
- Air emissions;
- Certain wastes containing chromium;
- Demolition debris
- Wastes left in the bottom of product storage tanks, as long as that residue is not removed from the tank;

- Wastes discharged to surface waters under a National Pollutant Discharge Elimination System (NPDES) permit;
- Fly ash and related waste from burning fossil fuels;
- Scrap metal, used lead-acid batteries, and waste oil ***that will be sent offsite for reclamation;***
- Waste remaining in the bottom of containers emptied through conventional means (e.g., pumping or pouring). This residue must measure no more than one inch, or constitute no more, in the case of a 55-gallon drum, than 3 percent by weight of the total capacity (1.65 gallons in a 55 gallon drum).
- Wastes managed in an elementary neutralization unit, a totally enclosed treatment unit, or a wastewater treatment unit.
- Arsenic-treated wood or wood products used as intended.
- Waste materials that are reclaimed and returned for use to the original process in which they were generated, provided that certain "closed-loop" recycling criteria are met (essentially, the wastes never leave the production loop).

If you think, but are not sure, that your wastes fit this group, call the state environmental agency.

Question 4: Is The Waste Listed?

A waste is *automatically* considered hazardous if it appears on any one of four lists of hazardous wastes contained in the RCRA regulations. Comprised of more than 400 substances, the lists—found in Subpart D of the regulations—include chemicals that exhibit one of the four hazard characteristics.

A chemical waste does not make one of these lists by accident. EPA follows strict criteria in making the determination of whether a particular substance should be listed. EPA is authorized to list classes of hazardous wastes (e.g., electroplating sludges), as well as named substances (e.g., acetone).

The listed wastes are known by letter identification, as follows:

F wastes. This category refers to generic waste streams found in a variety of industrial processes. Many SQGs generate F wastes; the short list includes cleaners and strippers, dry-cleaning solvents, spent paint wastes, still residues, cleaning and stripping tank solutions, plating bath

solutions and sludges from electroplating operations, and sludges from pretreatment of wastewaters.

Examples
F002—Waste perchloroethylene

F005—Methyl ethyl ketone
F003—Acetone

K wastes. This category refers to specific industrial processes whose wastes are deemed hazardous, such as wastes from the manufacturing of certain chemicals, pigments, inks, explosives, and petroleum refining and steel finishing.

Examples
KOO 1—Bottom sediment sludge from the treatment of wastewaters from wood preserving, processes that use creosote and/or pentachlorophenol
K083—Distillation bottoms from aniline production

P wastes. This category refers to discarded chemical products or off-specification products containing certain acute toxic chemicals. This category includes many pesticides, toxic metals, and organic chemicals shown to be carcinogenic. Except for small chemical firms and pesticide formulators, few SQGs generate P wastes.

Examples
P05-Fluorine
P099—Potassium silver cyanide

U **wastes.** This category refers to discarded chemical products or off-specification products containing certain toxic chemicals. This list also contains many pesticides, toxic metals, and organic chemicals. As described above, few SQGs generate these wastes.

Examples
U037-chlorobenzene
U06 1—DDT

Special Note about Solvent Wastes

Many *solvents* are mixtures that contain one or more of the "listed" F-waste constituents. It is important to remember that only wastes derived from products containing 10 percent or more of listed solvents are hazardous wastes.

The 10 percent rule does not, however, apply to ignitable wastes (F003) because F003 solvent mixtures may be ignitable at concentrations below 10 percent.

F003 Mixtures should therefore be tested; if the wastes are no longer considered ignitable, they do not need to be classified as a RCRA hazardous waste.

Question 5: Does your Waste Exhibit a Hazardous Characteristic?

The "lists" are not exhaustive. Listing is only one of the ways in which regulated wastes are identified. In addition to all of the substances that are specifically listed in the regulations, any other wastes found to be ignitable, corrosive, reactive, or toxic are also hazardous wastes.

Let's look more closely at how the characteristics are defined (wastes identified as hazardous by characteristic carry the code "D"):

Ignitable. A waste is considered hazardous if it is easily combustible or flammable. Specifically, the wastes must have *a flash point of less than 140 F: A* solid waste is ignitable if it can burn spontaneously and burn persistently. Oxidizers are generally considered ignitable under this definition.

Examples
D00 1 -Spent mineral spirits
D001—Spent lacquers
D00 1—Spent Stoddard solvent

Corrosive. A waste is considered hazardous if it dissolves metals or other materials, or burns the skin. Specifically, the wastes must have a pH of 2 or less (acids) or a pH of 12.5 or more (bases or caustics).

Examples

D002—Spent sulfuric acid
D002—Spent naval jelly
D002—Spent strippers

Reactive. A waste is considered hazardous if it is unstable or undergoes rapid or violent chemical reaction, often explosion, with water or other materials. Reactive wastes also, under certain conditions, can release toxic vapors. Most SQGs will not encounter reactive wastes as often as those with other characteristics.

Examples
D003 - Waste hydrogen cyanide
D003 - Waste hydrogen sulfide

Toxic. A waste is considered toxically hazardous if it is poisonous or can cause cancer, mutations, illness, or death. This could include an enormous universe of chemicals, but it does not. The regulations currently contain a list of just 14 substances that, if present in an extract of the waste stream at threshold concentrations, render the entire waste stream subject to regulation as a hazardous waste.

Testing involves extracting the liquid portion of the waste in such a way that the procedure itself simulates landfill leaching. For this reason, the analytical method is often referred to as the

Toxicity Characteristic Leaching Procedure (TCLP or "T-Clip") extraction test. Currently, EPA has set thresholds for 25 toxic constituents, but the Agency should soon finalize standards for many additional toxic metals, and organic and inorganic chemicals.

Examples
D004 Spent arsenicals
DOO 7/DOO Most paints with toxic metals (chromium, lead)

D008—Lead dross/scrap from batteries
DO 11—Spent silverplating waste

Question 6: Are You Complying With Two Special Rules?

At this point, you may be starting to realize that all of the above determination methods are based on the idea that you have, and can isolate, a single specific waste from one process. What if, as is often the case, several kind of wastes are thrown together, as in a single barrel in the comer, waiting for pickup? This turns what may have started out as waste oil (not a regulated substance in most states) into a hazardous waste which can greatly increase the quantity of hazardous waste you generate.

There are two additional rules that SQGs must understand. The first is called the "mixture rule," and the second, the "derived-from rule." Both are relatively easy to understand.

"Mixture rule." Unless permitted to do so by the EPA or the state hazardous-waste management agency, intentionally mixing a hazardous waste with a nonhazardous waste brings *the entire mixture* under regulation as a hazardous waste. For example, when contaminated solvent is mixed with waste oil in the same drum.

A notable exception to this "treatment rule" is altering pH. Check with your hazardous-waste management agency or local treatment plant concerning pH adjustments.

"Derived-from rule." This rule is even more basic:

Any waste derived from a *listed* hazardous waste is a hazardous waste.

An obvious example of this is the incineration of contaminated solvent, a hazardous waste, which leaves a sludge. The sludge was derived from the original waste so it too is hazardous.

In the case of *characteristic* waste mixtures, if the residue continues to exhibit one or more of the characteristics of the original substance, the waste is **classified as hazardous. Thus, the sludge, ash, dust, or leachate from** hazardous **waste reclamation** (e.g., **distillation stills), incineration, or** treatment may be fully regulated as a hazardous waste.

To determine whether your wastes are regulated, ask yourself:

1. Are they in the exempted list above?

2. Are they named on the EPA's lists?

3. If unnamed, do the MSDSs or other information (labels, brochures, spec sheets, correspondence, shipping papers) concerning the raw materials that created the wastes indicate one of RCRA's four hazardous characteristics?

4. Is the waste listed in the Warren Waste Management Plans waste data sheets?

Other Waste' Issues to Address

First, you should be aware that there is a subcategory of listed wastes referred to as "acutely hazardous. " These wastes are so dangerous, even in small amounts, that if you generate more than 1 kg (approximately 2.2 pounds) of these wastes in a calendar month, you are subject to all of the "large-quantity" generator requirements.

These wastes are primarily pesticides and are neither typically generated nor stored by SQGs.

Second, other wastes, must also be addressed—but not under RCRA. For example, wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than 50 ppm are wastes whose disposal is regulated by the Toxic Substance Control Act (TSCA), and appropriate state regulations.

Brake pads and linings containing asbestos must also be disposed of properly. EPA regulations require that asbestos be disposed of in a doublewalled plastic bag marked "Asbestos." While some local landfills will accept these bags, it is increasingly common to have to pay for these wastes to be taken to a special commercial landfill.

Third, check the Warren Waste Management Plans data sheets to review additional wastes.

Summary Checklist

Learning to Identify Wastes as Hazardous

1. Assume that all wastes excluding household garbage and paper wastes are potential hazardous wastes.

2. Make a list of all discarded substances, including wastes that are burned, placed in the trash, or poured down the drain.

3. Ask for assistance. For general compliance and notification assistance, contact the Environmental Department

4. Determine which of your wastes are "listed" wastes by comparing your wastes to the lists found in Part 261.31-.33 of 40 CFR (RCRA).

5. Use MSDS information on the product label, lists in this document, and consultation with the Environmental Department, chemical vendors, or waste haulers to determine which wastes are probable "characteristic" wastes.

Other Hints

Once you have determined which wastes are "listed" and which wastes are probable "characteristic" wastes, your waste hauler or an independent EPA-licensed laboratory canperform a waste characterization on your wastes to answer any uncertainties.

Try to avoid unnecessary and expensive private laboratory analysis. Industry-specificwaste streams are generally similar and can easily be identified by a RCRA compliance expert.

Be sure to test any chemicals that could be contaminated with heavy metals.

Remember, ignorance of a waste's hazard characteristics is not a legal defense. Be sure to identify all hazardous waste streams.

Finally, no matter what the legal status of a waste, and even if it is "exempted" (e.g., lead-acid batteries destined for reclamation), remember that these remain substances dangerous to human health and the environment. Treat them as such.

Specific Help

In Section 5 of this manual, you will find charts of hazardous (and non-hazardous) wastes commonly generated by NGC natural gas and NGL facilities. The following paragraphs discuss wastes typically generated in the natural gas industry.

WASTES GENERATED IN EXPLORATION AND PRODUCTION OPERATIONS

GAS PLANTS

This section discusses the four primary operations associated with E&P activities: gas plants, production facilities, drilling and workovers It discusses operational and design aspects as well as wastes generated Companies may vary in their engineering design and operational practices, but they generally all utilize the technology and generate the wastes discussed in this section.

Natural gas plants provide centralized dehydration, compression and sweetening facilities necessary to place natural gas in marketable condition and to extract natural gas liquids such as ethane, propane and butane.

Natural gas streams entering gas processing plants vary in composition but methane usually is the predominant component, with smaller amounts of ethane, propane, butanes, pentanes, and heavier hydrocarbons. The raw gas may also contain compounds such as carbon dioxide, hydrogen sulfide, mercaptans, other sulfur compounds, water, and certain solid impurities. These compounds are removed in treating facilities. The treated raw gas then enters an extraction facility which produces residue gas and heavier natural gas liquids (NGLs) such as ethane, propane and butane.

Listed below are the five extraction and treating processes frequently performed in gas plants and the waste materials that may be generated from these processes.

INLET SEPARATION AND COMPRESSION

Gas is gathered from the field at the inlet of the gas plant. Here fluids such as produced water and liquid hydrocarbons are separated, and the gas, if necessary, is compressed to a sufficient pressure to allow the plant to operate. Wastes typically associated with inlet separation include produced water as well as pigging materials, inlet filter media, fluids from corrosion treatments, and small amounts of solid material (pipe scale, rust, and minor amounts of reservoir formation materials). Wastes generated from the operation of plant inlet compressors are the same as wastes generated from compressors used in field operations. These wastes include engine cooling water and used lubrication oil and filters.

Inlet separators should be designed to send the produced water and hydrocarbons into process vessels where hydrocarbons can be recovered for sale and produced water separated for disposal. Small amounts of pigging materials may be recovered at pig receiving traps andshould be disposed of properly.

For safety reasons, inlet separators are equipped with relief valves that vent to emergency containment. This occurs if a fluid slug reaches the plant that exceeds separation capacity or if gas pressure exceeds design capacity of plant facilities. Emergency pits are not disposal facilities and fluids vented should be recovered as soon as practical (generally within 48-72 hours) and disposed of properly.

The pits should be constructed in accordance with regulations. In the event natural gas is flared, these flare incidents may require reporting to air quality and oil and gas regulatory agencies depending on the composition and volume of the flare gas.

DEHYDRATION

All natural gas contains a certain amount of water vapor. Typically this water content must be reduced to meet sales pipeline specifications. Dehydration is the process of extracting water vapor to make the gas marketable. The processes used are identical to those used in field facilities where centralized dehydration at a gas plant does not occur.

Natural gas is dehydrated by contact with liquid or solid desiccants. Liquid desiccants such as ethylene, diethylene, or triethylene glycol absorb the water. Heat regeneration evaporates the water, and the glycol is recovered for reuse. With solid desiccant dehydration, natural gas flows through tower vessels filled with alumina, silica-gel, silica-alumina beads, or molecular sieve which absorb water vapor

Wastes generated during the dehydration process consists of glycol based fluids, glycol filters, condensed water, and solid desiccants. These fluids and solids may contain trace levels of hydrocarbons and treating chemicals.

SWEETENING & SULFUR RECOVERY

Some natural gas contains hydrogen sulfide, carbon dioxide, or other impurities that must be removed to meet specifications for sales pipeline and field fuel use. The process of sweetening may be conducted using units identical in operation to units used in field facilities where centralized sweetening facilities are unavailable or in dedicated sulfur recovery facilities where high hydrogen sulfide concentrations are present.

Sweetening primarily consists of lowering the hydrogen sulfide and carbon dioxide content in natural gas. Hydrogen sulfide is removed from natural gas by contact with amine, sulfinol, iron sponge, caustic solutions, and other sulfur converting chemicals. Heat regenerates amine or sulfinol for reuse. Iron sponge, caustic solutions, and other sulfur converting chemicals are spent in the process as hydrogen sulfide is converted to iron sulfide and other sulfur compounds.

Amine treating of natural gas for the removal of hydrogen sulfide and carbon dioxide is the process that is probably most widely used in industry.

This process is based on the reaction that aliphatic alkanolamines will react with acid gases at moderate temperatures, and that the acid gases are released at slightly higher temperatures.

The reactions for this process using aqueous monoethanolamine (MEA) and hydrogen sulfide are as follows:

$$2\,(HO\,CH_2 - CH_2 - NH_2) + H_2S \leftrightarrows (HO\,CH_2 - CH_2 - NH_3)\,2\,S + Heat$$

$$(HO - CH_2 - CH_2 - NH_3)\,2\,S + H_2S \leftrightarrows 2\,(HO - CH_2 - CH_2 - NH_2)\,HS + Heat$$

Wastes generated in amine sweetening include spent amine, used filter media, and acid gas which must be flared, incinerated or sent to a sulfur recovery facility.

In the iron sponge treating process, iron oxide reacts with hydrogen sulfide to form iron sulfide. Iron sponge is composed of finely divided iron oxide, coated on a carrier such as wood shavings.

The chemical reaction for the removal of hydrogen sulfide with the iron sponge treating process is as follows:

$3H_2S + Fe_2O_3 \rightarrow Fe_2S_3 + 3H_2O$

The iron sponge process is generally used for treating gas at pressures less than 50 psig with total hydrogen sulfide content under 100 grains per 100 standard cubic feet. There is no limit to treating pressure; however, due to inherent gas velocity limitations through the treating bed, most high pressure applications are limited due to the economics of bed size and bed life. Wastes generated in the iron sponge process are iron sulfide and wood shavings.

Small volumes of hydrogen sulfide may also be removed from natural gas and NGLs by contact with a caustic solution which is reused until spent. Most caustic treaters utilize a 15 to 20 percent by weight sodium hydroxide solution wherein the caustic consumption is approximately 2.4 pounds per pound of hydrogen sulfide removed and 1.9 pounds per pound of carbon dioxide removed. Most caustic treaters consist of a simple vessel holding the caustic solution through which gas is allowed to bubble.

The chemical reaction for removal of hydrogen sulfide with caustic is as follows:

$H_2S + NaOH \rightarrow Na_2S + 2H_2O$

The primary waste from caustic treating is spent caustic solution. Use of other sulfur converting compounds such as sulfa-check are employed in one-step processes for the removal of low levels of hydrogen sulfide. Here, a direct conversion occurs at ambient temperature that uses a single contact vessel. Natural gas bubbles through the vessel until the sulfur converting compound is spent. The spent material is a nonhazardous slurry of sulfur and salts.

Dedicated sulfur recovery facilities for high hydrogen sulfur content gas or high throughput facilities may use catalytic processes. Here, hydrogen sulfide is removed from sour natural gas using amine or sulfinol solutions.

As part of the regeneration process, hydrogen sulfide is driven out of solution. The hydrogen sulfide is then burned in the presence of oxygen to produce sulfur dioxide. A mixture of hydrogen sulfide and sulfur dioxide, when passed over a heated catalyst, forms elemental sulfur.

This process is known as the Claus process. It uses inert aluminum oxide, in pellet form, as a catalyst. The catalyst does not react in the sulfur making process. The aluminum oxide catalyst simply provides a greater surface area to speed and assist the process.

Molecular sieve absorbents are used to remove hydrogen sulfide, mercaptans, and heavier sulfur compounds from gases and NGLs. Simultaneous sweetening and dehydration may be accomplished in the same unit. Molecular sieve sweetening is a regenerable batch type operation which requires at least two beds for continuous processing. One bed is sweetening gas while the other is being regenerated.

Waste materials generated may include water vapor, which is vented, condensed or contained within the molecular sieve; regeneration gas which is used as a fuel source or recombined and sent to sales; and spent molecular sieve.

NGL RECOVERY

Gas plants provide centralized gas gathering services (such as compression, dehydration, and sweetening) and also recover NGLs which are hydrocarbons heavier than methane which exist as liquids at moderate pressures. NGL recovery is the process by which hydrocarbons such as butane or propane are extracted. NGL extraction may use either compression and/or cooling processes, absorption processes, or cryogenic processes. These processes either absorb heavier molecular compounds from the process stream with an absorption oil that is recycled or use temperature and pressure to separate fractions with different boiling points.

Wastes generated include lubrication oils, spent or degraded absorption oil, waste waters, cooling tower water, and boiler blowdown water.

Plant compression and utility systems (fuel, electrical generators, steam equipment, pump, and sump systems) are necessary to operate gas plants and to raise the pressure of plant residue gas to match sales gas pipeline pressure. Compressors are driven by electric motors, internal combustion or turbine engines. These engines, compressors and utility systems generate used lubrication oils, cooling waters, drips of lubrication and hydraulic oils, wastewaters, varsol used for cleaning equipment, and oily debris such as rags, sorbents and filters.

Liquid wastes should be disposed of via the plant sump system where wash waters, lubrication oils, cooling waters, etc., are typically collected via a series of sumps. Fluids are usually collected from the sumps into a central clarifier/classifier pit where waters are
separated for disposal via Class II injection wells, NPDES discharge, or evaporation pits.

Hydrocarbons are recycled by returning them to sales streams or, if sales streams are not available, to waste oil collection and reclamation facilities.

Other solid wastes include filters which should be disposed of in accordance with applicable regulations

SEPARATORS

Two phase separators isolate produced liquids from gases as they flow from the wells. Three phase separators, with additional float mechanisms, also separate produced water from liquid hydrocarbons and deliver gas, oil or condensate, and water to respective facilities for further processing or sale. The primary waste generated is bottoms, including sand and scale recovered during cleanout operations. A free-water knockout (F WKO) is a vessel which separates free water (water that is not linked to oil in an emulsion) from other produced fluids. Separated produced water then flows into a

disposal or injection system. FWKOs are occasionally drained to remove solids and bottom sludges.

HEATER TREATERS

Heater treaters and/or electrostatic treaters separate emulsified oil and water. Occasionally, emulsions which cannot be successfully treated in a single pass ("bad oil") must be placed in a standby oil tank for recycling and further treatment. Produced water which is separated in the treaters goes to a disposal or injection system. As with the FWKO, these vessels are occasionally drained to remove solids and bottom sludges. Vessels which use hay or excelsior sections to absorb minute amounts of oil must be periodically cleaned out and the absorption material replaced.

FILTERS

To improve fluid and water quality, filters are frequently used. Filter media must be replaced or, if permanent, backwashed. Replaceable filters include sock, cartridge, or canister units. Permanent filters may use diatomaceous earth or granular media such as sand or coal.

Permanent filters are periodically backwashed with fresh or produced water sometimes containing a small amount of surfactant. Backwash is circulated to a solids treatment and disposal system where the backwash liquid is then usually returned to the production facilities for reprocessing.

GAS FLOTATION VESSELS

Another type of treatment system utilizes gas flotation. These units are sometimes used to remove small concentrations of insoluble oil and grease from produced water. The units agitate the water by injecting a gas, usually natural gas or air, through the liquid stream. This action flocculates the suspended oil, grease, and dirt. The flocculated materials rise to the surface where they are skimmed off. Depending on the quality of this material, it may be discarded as waste or recovered as oil.

COMPRESSORS

Compressors are used to boost lower pressure gas to sales line pressure, for vapor recovery, or to allow flow into central facilities. Compressors may be electric motor driven or driven by internal combustion or turbine engines.

Wastes generated include engine cooling water and used lubrication oils and filters.

DEHYDRATION AND SWEETENING UNITS

Field dehydration and sweetening units perform the same function as described for gas plants. Wastes include iron sponge, spent glycol, spent amine, spent caustic and filter media.

Scrubbers are used where necessary to separate fluids from gas. After scrubbing, recovered fluids may include condensate, oil and/or produced waters which should be recycled by returning to process facilities.

METHANOL INJECTION AND LINE HEATERS

As gas is produced from a reservoir, its pressure and temperature drop. If sufficient water or water vapor exists in the gas stream hydrates (ice) may form and block flow lines. To prevent hydrate formation, methanol is sometimes injected in low concentrations (ppm) or line heaters are used.

The only waste generated from methanol injection is empty methanol containers. Wastes generated from line heaters include spent thermal fluids (such as glycol, oil or salt mixtures) used to transfer heat from heat sources to the gas stream.

EPA's List of Exempt Exploration and Production Wastes

The following wastes are listed as exempt in EPA's Regulatory Determination submitted to Congress in June 1988:

- Produced water
- Drilling Fluids
- Drill Cuttings
- Rigwash
- Drilling fluids and cuttings from offshore operations disposed of onshore
- Well completion, treatment, and stimulation fluids
- Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste
- Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves
- Gas plant sweetening wastes for sulfur removal, including amine, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge.
- Cooling tower blowdown.
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream
- Packing fluids
- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation
- Hydrocarbon-bearing soil
- Pigging wastes from gathering lines

- Wastes from subsurface gas storage and retrieval, except for the listed nonexempt wastes
- Constituents removed from produced water before it is injected or otherwise disposed of
- Liquid hydrocarbons removed from the production stream but not from oil refining
- Gases removed from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons
- Materials ejected from a producing well during the process known as blowdown
- Waste crude oil from primary field operations and production
- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment.

EPA's List of Nonexempt Exploration and Production Wastes

EPA's Regulatory Determination for exploration and production wastes lists the following wastes as nonexempt. It appears that the EPA concluded waste materials from maintenance of production equipment as well as transportation (pipeline and trucking) related wastes were nonexempt. While the following wastes are nonexempt, they are not necessarily hazardous.

- Unused fracturing fluids or acids
- Gas plant cooling tower cleaning wastes
- Painting wastes
- Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids
- Vacuum truck and drum rinsate from trucks and drums transporting or containing nonexempt waste
- Refinery wastes
- Liquid and solid wastes generated by crude oil and tank bottom reclaimers
- Used equipment lubrication oils
- Waste compressor oil, filters, and blowdown

- Used hydraulic fluids
- Waste solvents
- Waste in transportation pipeline-related pits
- Caustic or acid cleaners
- Boiler cleaning wastes
- Boiler refractor bricks
- Incinerator ash
- Laboratory wastes
- Sanitary wastes
- Pesticide wastes
- Radioactive tracer wastes
- Drums, insulation, and miscellaneous solids.

EPA did not specifically address in the Regulatory Determination the status of hydrocarbon-bearing material that is recycled or reclaimed by reinjection into a crude stream (used oils, hydraulic fluids, and solvents).

However, under existing EPA regulations, recycled oil, even if it were otherwise hazardous, could be reintroduced into the crude stream, if it is from normal operations and is to be refined along with normal process streams at a petroleum refinery facility [see 40 CFR§261.6 (a)(3)(vi)].

ADDITIONAL EXEMPT WASTES

It should be noted that EPA's lists of exempt and nonexempt wastes are not all-inclusive and that determinations will need to be made on a number of other incidental wastes. In deciding which wastes were exempt, it appears that EPA focused on wastes necessary to conduct so-called "primary field operations" (including centralized facilities and gas plants).

Using this approach, the following wastes, although not specifically listed as exempt, appear clearly exempt.

- Excess cement slumes and cement cuttings
- Sulfur contaminated soil or sulfur waste from sulfur recovery units
- Gas plant sweetening unit catalyst

- Produced water contaminated soil
- Wastes from the reclamation of tank bottoms and emulsions when generated at a production location
- Production facility sweetening and dehydration wastes
- Pigging wastes from producer operated gathering lines
- Production line hydrotest presenring fluids utilizing produced water
- Iron sulfide

This section does not address wastes exempt from Subtitle C under other provisions of RCRA (e.g., 40 CFR 261.4).

Requirements for Nonexempt Wastes

Operators should consider testing nonexempt wastes whenever there is reason to believe they may exhibit one of the hazardous waste characteristics.

Although there is no requirement that a nonexempt waste be tested to determine if it is hazardous, civil and criminal penalties may be imposed if the waste is not managed in a safe manner, and according to regulations.

It is also important to emphasize the prudence of segregating non-exempt waste from exempt waste. One possible implication is that knowingly commingling of a nonexempt waste with an exempt waste could result in the entire waste stream losing its exempt status and perhaps having to be handled as a hazardous waste.

If the nonexempt waste were a listed hazardous waste, EPA's mixture rule makes the entire commingled waste stream subject to stringent RCRA Subtitle C requirements, including the requirement that it be disposed at a hazardous waste facility. Therefore, it is usually in the best interest of an operator to routinely segregate nonexempt waste from exempt waste. When segregation is not practical, the nonexempt waste should be examined closely to ensure that it is not a hazardous waste.

Finally, there are a few states with hazardous waste regulations which differ from those the EPA has promulgated. These state rules are at least as stringent as the federal regulations (by law they must be at least equivalent to those set forth by the EPA).

LIST OF TYPICAL GAS PROCESSING WASTE STREAMS

ACID (SPENT)

WASTE CATEGORY:

Spent acid from gas processing plants may be a characterisitcally hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for hazardous characteristics (corrosivity) and TCLP metals.

DISPOSAL AT AN OCD-APPROVED FACILITY If **NOT HAZARDOUS**: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store acid in a properly labeled rigid-wall container prior to disposal. Handle in a manner that minimizes employee exposure.

FOR SHIPPING: if **nonhazardous** no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call ES&H in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If test indicates non-hazardous waste, it should be disposed of in a permitted injection/disposal well. If test indicates hazardous waste, it should be disposed of at a RCRA permitted TSD facility. Contact safety department.

ACTIVATED ALUMINA

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow alumina to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store alumina in a properly labeled container prior to disposal.

FOR OFFSITE SHIPPING, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-approved disposal facility. See Section 12 for a complete and current list of facilities.

AMINE - includes spent monoethanolamine, diethanolamine.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) **when used in gas sweetening processes**. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal in onsite or commercial disposal well.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III**. Shipping papers are **required**, the placard is **Corrosive**. For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD to **dispose of gas plant wastewaters**; OR, if specified in the permit, NPDES discharge.

AMINE RECLAIMER BOTTOMS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from vessels should be done in such a manner as to minimize spillage. Use drip pans or catchment vessels.

Mix solids with wastewaters for disposal via Class II disposal well.

For storage onsite prior to disposal, place in drums, tanks, or other closed/covered containers, or remove from site immediately upon removal of bottoms from vessels.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III**. Shipping papers are **required**, the placard is **Corrosive**. For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (on-site or off-site) permitted by the OCD to accept gas plant wastewaters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

ANTIFREEZE (USED)

WASTE CATEGORY:

Used antifreeze consists of a mixture of ethylene glycol and water that is used as a heat transfer medium in internal combustion gas compressor engines. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Used antifreeze should be recycled or reclaimed if possible.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove antifreeze from radiator/engine in a manner which prevents spillage. Drip pans or catchment vessels are recommended. If antifreeze is stored, leak-proof, rigid-walled containers are preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, state may allow disposal in a permitted injection well. Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BARRELS/DRUMS/CONTAINERS (NOT EMPTY)

WASTE CATEGORY:

Containers which held chemicals, paints, thinners, solvents, or other products but now are only partially full of the material. The exact contents of the material in the barrel/drum may be unknown. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

If the contents are known, return the barrel/drum/container to the vendor or use the contents. If the contents are unknown, see MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS section below.

TESTING:

Contact environmental staff.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If the contents of the barrel/drum/container are known, handle the material as indicated by the IVISDS. If the contents are unknown, contact your environmental staff. Store the barrel/drum/container so that leakage is prevented. Place bungs or covers securely on containers during storage.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BOILER WATER BLOWDOWN

WASTE CATEGORY:

Non-exempt solid waste (53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for ignitability, corrosivity, reactivity, and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds to characterize the waste. If the generator can prove by knowledge of process, that this waste is not hazardous, then no testing is required. The generator must provide information concerning the process and the chemicals used in that process.

FOR NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal.

FOR SHIPPING: if **nonhazardous** no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL, maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; OR, if specified in the permit, discharge per NPDES permit .

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well or if specified in the permit, NPDES discharge.

BRINE CONTAMINATED SOILS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

FOR ON-SITE TREATMENT/DISPOSAL: Contact environmental department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If necessary, brine contaminated soils should be stored in an area lined with impermeable material and bermed to prevent runoff or leaching.

When remediation is deemed necessary (usually per landowner's request) contaminated soils should be sampled and analyzed for chloride content and sodium absorption ratio. Soil restoration should begin promptly. In-place treatment is recommended. Depending on site hydrologic characteristics, land treatment may be acceptable. Gypsum or other soil treatments may be applied. (Such as LCA 11.) Soil rinsing may be appropriate with approved disposal of residue (see Brine Water).

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE TREATMENT/DISPOSAL: Contact environmental department.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Removal of the contaminated soil and disposal in a permitted off-site pit or landfill is acceptable. Contact safetydepartment.

BRINE WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with the testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Separate oil, condensate, water. Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted or covered in some manner to protect wildlife. Avoid contact with soil as much as possible. Collect hydrocarbons in storage vessel for sale.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; OR, if specified in the permit, NPDES discharge.

Off-site evaporation at a permitted facility.

CAUSTIC - spent.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank, or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING: The shipping description is **Sodium Hydroxide, Solution, 8, UN1824, II**. Shipping papers are **required**, the placard is **Corrosive**. If the shipment contains 1,000 lbs or more, the letters "**RQ**" must precede the shipping description.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

CHARCOAL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow charcoal to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store charcoal in a properly labeled and sealed container prior to disposal. Dust can be explosive.

FOR SHIPPING OFFSITE: The shipping description is **Charcoal, 4.2, NA1361, III**. Shipping papers are **required**. The placard is **Spontaneously Combustible**.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

COOLING TOWER BLOWDOWN

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

Operate cooling towers efficiently to minimize the generation of blowdown.

TESTING:

FOR DISPOSAL WELL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in wastewater storage vessel such as sump, storage tank or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; OR, if specified in the permit, NPDES discharge.

COOLING TOWER SLUDGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: The waste must be characterized. Test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, and reactivity. Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove by knowledge of process that a waste is not hazardous, then no testing is required. The generator must provide information regarding the process from which the waste is generated and the chemicals used in that process.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

(1) Remove all free liquids and incorporate into wastewater disposal system. (2) Store in drums, tanks, or other closeable containers.

FOR SHIPPING OFFSITE: if **nonhazardous** there are no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

DEBRIS, UNCONTAMINATED - includes wood, glass, concrete.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at facilities approved by the New Mexico Oil Conservation Division or at a municipal landfill. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if permitted in the facility discharge plan. Consult lease requirements and landowner for any additional requirements.

DEHYDRATOR - CONDENSED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be stored in leak-proof, rigid-walled containers.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge

DRUMS - Empty plastic or metal.

WASTE CATEGORY:

Non-exempt solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. Check the Material Safety Data Sheet (MSDS) and Hazardous Waste Booklet (Section 14) to confirm whether drum contained a pure product that is listed as acutely hazardous. If the product is acutely hazardous consult with HE&LP in Houston for specific cleaning instructions.

WASTE MINIMIZATION:

Return drums to vendor.

Use tanks to store chemicals in bulk and reduce or eliminate the use of drummed chemicals.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not allow empty drums to accumulate onsite. All drums must be empty; i.e., All materials or wastes have been removed using practices employed to handle drums such as pouring, pumping, or aspirating. No more than 2.5 centimeters (one inch) of residue remains on the bottom of the drum or inner liner. No more than 3% by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 110 gallons in size; no more than 0.3% by weight of the total capacity of the container or inner liner if the container is greater than 110 gallons in size. Mark the drums as "Empty" and use one of the following options prior to disposal. 1) Replace the lid or bungs tightly on empty drums to prevent the accumulation of rainwater or other materials. Rainwater or other materials that accumulate in empty drums may have to be handled and disposed as hazardous waste. 2) Cut the ends out of the drum so it cannot be used as a container.

FOR SHIPPING: Remove or paint over all DOT markings and labels on drums prior to shipping.

RECORDKEEPING/REPORTING REQUIREMENTS:

Track the empty drums using the Warren Petroleum Company Waste Drum/Container Log (Section 11). Keep Bill of Lading, run ticket, or other information that documents the generator, transporter, disposal site and volume when drums are disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle drums: Make arrangements with vendor to return on a deposit basis.

Replace drums with bulk storage units.

FILTERS, AIR

WASTE CATEGORY:

Inert nonhazardous solid waste. This waste can be disposed at a facility permitted by the New Mexico Oil Conservation Division or at a municipal landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store separately from oil, sock, glycol or other filters to avoid contamination, testing and permitting requirements.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary if disposed with other inert solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of filters disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, GLYCOL

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste

WASTE MINIMIZATION:

None at this time.

TESTING:

TCLP (not required if recycled).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Waste filters should be handled in a way to prevent spillage. Drip pans or catchment vessels should be used. All liquids should be drained from filters before disposal. Liquids should be returned to production facilities for reprocessing. Filters should be segregated from other filter types, placed in plastic garbage bags and into metal containers.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep following records: Disposal date, number of filters disposed of, haulers name, location and name of disposal facility. Results of analyses (TCLP) required for disposal into landfill. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle filters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, SOCK includes sock filters used as glycol, and amine filters.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: OCD does not require testing of this waste; however, each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect liquids. Allow filters to dry for 48 hours. Store in bin for process filters. Incorporate liquids into wastewater disposal system.

FOR SHIPPING OFFSITE, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, USED OIL - non-terne plated; terne is an alloy of tin and lead which is used to plate oil filters. These filters are from an internal combustion engine used to filter crankcase oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain more than 24 hours to remove all used oil by one of the following hot-draining methods: 1) Puncturing the filter anti-drain back valve or the filter dome end and hot-drain; OR 2) Hot-drain and crush; OR 3) Dismantle and hot-drain; OR 4) Flush the filter; OR 5) Any other equivalent method which will remove the free flowing oil.

After draining, allow filters to dry. Collect oil and reclaim or sell for refining. Store filters in covered enclosure or covered rainproof containers on an impermeable surface. Containers must be labeled "Used Oil Filters". **Do not keep storage units containing filters onsite more than 30 days**. Transport containers must be labeled with the date, the final destination, and the name and address of both the generator and the transporter.

FOR SHIPPING OFFSITE, if **nonhazardous** no shipping requirements. If **hazardous** contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Retain copies of the Bill of Lading, run ticket, or other billing information that documents the volume and type of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

OCD-permitted processor, disposer, or end user (someone who uses the oil filters or its components as feedstock for their processes).

GLYCOL - spent ethylene glycol, triethylene glycol, and diethylene glycol.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) **when used in dehydration processes** (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or tank, prior to disposal. Tanks that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, For **Ethylene Glycol only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains ethylene glycol), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; OR, if specified in the permit, NPDES discharge.

HYDROSTATIC TEST WATER

WASTE CATEGORY:

Hydrostatic test water is **exempt** from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b)) **when derived from the testing of gathering pipelines or pipelines used to transport raw or unrefined products**. Hydrostatic test water is **non-exempt** solid waste under RCRA **when derived from the testing of transmission pipelines or pipelines used to transport refined products**. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. See Section 12 (Guidelines for Hydrostatic Test Dewatering) for specific information regarding the requirements for disposal of this waste in New Mexico.

WASTE MINIMIZATION:

Conduct tests only when necessary.

TESTING:

FOR CLASS II DISPOSAL WELL: if exempt no testing is required. If non-exempt, test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, corrosivity and reactivity. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

FOR DISCHARGE PER NPDES PERMIT: meet testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: maintain records of type and volume of waste, generator, transporter, and disposal facility by retaining run tickets or other billing information. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF EXEMPT OR NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted **for disposal of gas plant wastewaters**; OR, If specified in the permit, NPDES discharge.

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; **OR**, if specified in the permit, NPDES discharge.

INHIBITORS (USED) / BIOCIDES

WASTE CATEGORY:

(Chemical inhibitors can be used for selected chemical treating programs to prevent scale. In most cases these chemicals will remain in the gas stream and do not become a waste management issue. This description addresses the case where inhibitors are recovered). Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: TCLP, RIC if recovered inhibitors cannot be reused.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

All spent inhibitors should be contained to prevent spills or leaching to the soil. Drums or containerized storage is preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Reuse/reclaim if possible.

If reuse/reclaim not possible, contact the safety and environmental department for case bycase evaluation.

IRON SPONGE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wash thoroughly with a soda ash and water solution by circulating it through the bed for several hours to prevent auto-ignition. Can also be regenerated using this method. Incorporate soda ash solution into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

LEAD ACID BATTERIES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wear protective equipment and handle in manner to prevent spillage of acid. Store in vented area. Do not store on ground or cement slab.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) DOT manifest for transport by vessel. 2) Retain copy at assigned locations. 3) Copy of MSDS.

Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor for exchange.

Local recycler.

LITHIUM BATTERIES

(Batteries used in Haliburton flow meters)

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wrap in shipping container provided by Haliburton. Store in a cool dry area.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) Mailing receipts. 2) Copy of MSDS.
Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor.

MERCURY

WASTE CATEGORY:

Mercury is a listed hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None if reclaimed or recycled, otherwise TCLP/Mercury and Total/Mercury.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contact Safety & Environmental Manager prior to any mercury handling. Should be stored in air-tight, properly labeled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Manifests or records of recycling. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details. No hazardous waste disposal is allowed in OCD-permitted facilities.

Contact safety department for recycling.

Dispose at an EPA permitted hazardous waste facility. Contact safety department.

MOLECULAR SIEVE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and incorporate them into the water disposal system. Allow molecular sieve to cool in a nonhydrocarbon inert atmosphere. Hydrate in ambient air for 24 hours.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Regenerate for reuse.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

NORM (Naturally Occurring Radioactive Material)

WASTE CATEGORY:

Special E&P Waste (Contact the Safety/Environmental Department). See Section 12 of the Manual for specific procedures for NORM handling and disposal in New Mexico.

WASTE MINIMIZATION:

None at this time.

TESTING:

Will be required for ground contamination and prior to disposal company acceptance. Check state rules.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Review company safety guidelines for handling NORM. Protect ground area with non-permeable material. NORM should be properly labeled and contained in an isolated area where there is restricted access to the public and employees. Area should be clearly marked.

RECORDKEEPING/REPORTING REQUIREMENTS:

Records generated for the disposal or storage of NORM should be maintained as active files.

DISPOSAL OPTIONS:

Do not dispose of NORM without approval of Safety/Environmental Department.

OILY RAGS - contaminated with lubricating oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use a contractor to supply clean rags and pick up used rags.

TESTING:

RECYCLING: The contractor may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in containers marked for oily rags only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, will need to review the shipping requirements. Contact EH&S, in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

RECYCLING: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Contract with a company to recycle used rags.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING WASTES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Paints should remain in their original metal containers with tight fitting lids.

RECORDKEEPING/REPORTING REQUIREMENTS:

If waste is hazardous, manifests, test data, and disposal records must be retained for three years and archived for fifteen years. No recordkeeping is necessary for non hazardous disposal.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Unused paint should be applied to equipment and buildings to prevent corrosion and water damage. Empty containers may be disposed of in permitted landfills.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING SOLVENT - used

WASTE CATEGORY:

Special - contact ES&H Deaprtment in Houston. Used painting solvent which is returned directly to condensate stream (hydrocarbon) without processing is not defined as a solid waste by the Resource Conservation and Recovery Act (RCRA).

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Painting solvent should not be filtered, accumulated, stored or otherwise processed prior to returning to condensate stream.

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping is necessary if painting solvent returned to condensate stream.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Do not process used painting solvent prior to returning to condensate stream. Processing creates a "solid waste" which may be subject to hazardous waste regulations.

PIGGING WASTE

WASTE CATEGORY:

Exempt waste under the Resource Conservation and Recovery Act (RCRA) if derived from gathering line; non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) if from distribution line. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If non-exempt, TCLP; RIC analysis may be required. Contact Safety & Environmental Department

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled to prevent spills or leakage. Should be stored in rigid-walled, leak-proof containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Maintain manifest or run ticket for a minimum of three years if off-site disposal is utilized and records archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If exempt, liquids can be disposed of at a Class II injection well. Solids need to go to an oil and gas permitted facility. If hazardous or non-exempt, contact the safety & environmental department.

PLANT TRASH - includes paper, cardboard, plastic containers, glass. Does not include items such as aerosol cans, paint cans, pesticides, batteries or flammables.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at a facility permitted by the New Mexico Oil Conservation Division or a permitted landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, other billing information that documents the generator, transporter, disposal site, and volume of material disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle paper, cardboard, glass, aluminum and plastics.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PROCESS WASTEWATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for ignitability, corrosivity, reactivity, Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds. If the generator can prove by knowledge of process that this waste is not hazardous then no testing is required. The generator must provide information concerning the process and the chemicals used in the process.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks, or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review the shipping requirements and possibly test. Contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS, Class II disposal well (on-site or off-site) permitted **for disposal of gas plant wastewaters**; OR, If specified in the permit, NPDES discharge.

IF THIS WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; OR, if specified in the permit, NPDES discharge.

PRODUCED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

None required

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner which prevents spillage onto ground or other surface and stored in rigid-walled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

State injection well regulations require that records be kept of volumes injected, annular pressures, origin of produced water. These records are required to be kept for a period of threeyears, and then should be archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Produced water can be injected into a state permitted Class II injection well.

SANDBLAST MEDIA

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Disposal of sandblast media used by a contractor remains the responsibility of that contractor.

TESTING:

Test for TCLP metals.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Enclose area to be blasted to collect media. Use proper personal protective equipment. Store in rigid-walled containers, or in 5000# polyurethane sacks.

RECORDKEEPING/REPORTING REQUIREMENTS:

All off-site disposal records should be maintained as active files for three years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal of sandblast media used by a contractor remains the responsibility of that contractor. If non-hazardous, recycle for reuse. Company generated sandblast media should be analyzed for TCLP metal content prior to disposal. Refer laboratory results to the Safety & Environmental Department.

SEWAGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). Local authorities typically have jurisdiction over sewage disposal (either in a sewer system or via septic tank). OCD has authority over sewage disposal when it is mixed with an oilfield waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner that minimizes exposure to workers. Adequate sanitary procedures should be implemented. For- long term operations, a septic system may be desirable. Septic systems must be permitted by state or local authorities.

RECORDKEEPING/REPORTING REQUIREMENTS:

Local authorities may have specific recordkeeping or reporting requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal in local sewer system (requires sewer connection).

Can be disposed of in an on-site septic system or by a commercially owned sanitation service.

SCRAP METAL - uncontaminated.

WASTE CATEGORY:

Nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Testing is not required unless contamination or scale is present. Review the Warren Petroleum Company policy on testing for Naturally Occurring Radioactive Material (NORM).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in areas designated for scrap metal. Do not mix with contaminated or hazardous material.

FOR SHIPPING: if not radioactive then no shipping requirements. If **radioactive**, call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, recycle site, and volume of scrap recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SILICA GEL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and allow silica gel to dry for 48 hours. Incorporate fluids into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH CRUDE OIL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Sectioon 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT AN OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by disposal plan.

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH LUBE OIL

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Section 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact Compliance for specific requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT A OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by the disposal plan

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOLVENT, HAZARDOUS - this material is either a listed hazardous waste according to 40 CFR 261.31 or is characteristically hazardous according to 40 CFR 261.21-24. The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use water-based solvents or detergents when possible.

TESTING:

If the waste is a listed hazardous waste per 40 CFR 261.31, then no testing is necessary. If the waste could be characteristically hazardous waste test for Ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, Reactivity and Corrosivity. The MSDS may have specific information regarding the solvents hazardous status. If the generator can prove by knowledge of process that the solvent is not hazardous then no testing is required. The generator must provide information about the chemical composition of the solvent and about the processes in which it was used.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not mix waste solvents with materials that are not hazardous. Nonhazardous waste mixed with a listed hazardous waste is automatically hazardous and increases the volume of hazardous waste that must be treated and disposed.

Store in containers for "Used Solvent" Only. Keep cover secure when not transferring material. Containers should be stored on an impervious surface and/or in a covered area. For conditionally exempt small quantity generators (CESQG) (generators producing less than 220 lbs per calendar month) do not accumulate more than 2200 lbs (1,000 kilograms) onsite at any one time. If the generator accumulates more than 2200 lbs onsite at any one time, then the generator must meet the requirements of a small quantity generator or large quantity generator depending on the volume of waste onsite.

FOR SHIPPING: the hazardous nature of this solvent will determine which shipping requirements to follow. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR CESQGs: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled or disposed. The generator may have to obtain an EPA identification number; many disposal facilities will not accept waste, regardless of generator status, without an EPA identification number. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Contract with a company to recycle waste solvents.
Dispose at a disposal facility permitted to accept waste solvent.

SOLVENT, NONHAZARDOUS - this material does not contain listed hazardous wastes (40 CFR 261.31) and is not characteristically hazardous (40 CFR 261.21-24). The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If the generator can prove by knowledge of process, including information on the MSDS, that the waste is not characteristically hazardous and has not been combined with a listed hazardous waste, no testing is required. If the waste could be characteristically hazardous, then test for ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, corrosivity, and reactivity.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store spent solvent in a sealable container or combine with slop oil or condensate. Do not mix with material that may be hazardous. Containers should be stored on an impervious surface and/or in a covered area.

FOR SHIPPING: the specific nature of the solvent will determine the applicable shipping requirements. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

IF COMBINED WITH SLOP OIL, CONDENSATE OR SENT TO A RECYCLER: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle by combining with slop oil or condensate for sale.

Contract with a company to recycle waste solvents.

SORBENT PADS - CONTAMINATED WITH CRUDE OIL.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

RECYCLE: each recycler may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove all free oil by washing to reduce the TPH concentration and return to oil storage tanks. Store pads in containers marked for sorbent pads only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY OR RECYCLER: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.
Recycle.

STORMWATER

WASTE CATEGORY:

Special E&P Waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for chlorides. Check for oil sheen.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Uncontaminated stormwater should be allowed to run-off the location as needed. Stormwater collected behind firewalls should not be discharged if it contains a "sheen". Stormwater should not be stored when it prohibits adequate storage volume within diked areas for spill prevention.

RECORDKEEPING/REPORTING REQUIREMENTS:

Diked areas refer to SPCC. If stormwater is taken to an injection well for disposal, a run ticket should be retained for a period of three years.

DISPOSAL OPTIONS:

Uncontaminated stormwater should be allowed to escape from location into natural drainage pathways.

Stormwaters containing a "sheen" should have the sheen removed and then be allowed to escape into natural drainage pathways.

SUMP SLUDGE - from all sumps onsite.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) and must be characterized to determine if hazardous. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL PITS: waste must be classified to determine if the waste is hazardous. Test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, reactivity and ignitability. Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove that the waste is not hazardous, then no testing is required. The generator must provide information on the chemical composition of the waste and the process from which it was produced.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of sludge from sumps should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove all free liquids. If nonhazardous, mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING: if **nonhazardous**, no shipping requirements. If **hazardous** contact EH&S in Houston for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, disposal site, and analytical results.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to accept gas plant wastewaters**.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

TANK BOTTOMS - from crude oil tanks.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

RECLAIMING: None required.

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR TRC-PERMITTED DISPOSAL PITS: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from tanks should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove and reclaim all free oil. Mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site. FOR ONSITE DISPOSAL WELLS, maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to accept gas plant wastewaters**.
OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

USED OIL - includes any oil refined from crude oil, or any synthetic oil, that has been used and as a result of such use if contaminated by physical or chemical impurities (40 CFR 279.1; 57 FR 41613).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Inspect tanks or containers on a regular basis for leaks or spills and to confirm that storage units are in good condition.

TESTING:

RECYCLING: each recycler may have specific testing requirements (such as total halogen) prior to accepting used oil. No testing required when combined with scrubber oil or condensate for sale.

DISPOSAL: used oil must be recycled in the State of Texas.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in tanks or containers marked "Used Oil". Tanks and containers must be in good condition (Generators storing used oil onsite must comply with applicable requirements of 40 CFR 112 Spill Control and Countermeasures plan for used oil storage units). Keep cover secure when not transferring material. Leaks or spills must be contained and repaired immediately; releases to the environment must be cleaned up.

Shipments of used oil of 55 gallons or less may be transported by the generator in their own vehicles and without obtaining an EPA identification number. An EPA registered transporter must be used for shipments of more than 55 gallons of used oil. Generators transporting more than 55 gallons must obtain an EPA identification number and comply with all requirements of 40 CFR 279 Subpart E.

Do not mix used oil with material that may be hazardous.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A PERMITTED RECYCLER: keep copies of Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil shipped as well as any analytical results and certification forms required by recycler.

WHEN COMBINED WITH SCRUBBER OIL OR CONDENSATE: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil sold.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

Combine with scrubber oil or condensate for sale.

WASH WATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA)(40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

For DISPOSAL WELL: this waste must be tested for corrosivity, reactivity, ignitability and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic to characterize the waste. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

For NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank or evaporation pit prior to disposal.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted to dispose of gas plant wastewaters; OR, If specified in the permit, discharge per NPDES permit.

IF THE WASTE IS HAZARDOUS, it can be disposed in a Class I Hazardous disposal well; OR, if specified in the permit, NPDES discharge

WOODEN PALLETS

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Return to vendor or sell.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

No special handling requirements..

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping required.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if allowed by the discharge plan. Consult lease requirements and landowner for any additional requirements.

Subpart 1

General Procedures For Sample Collection and Analysis

Contact and use an EPA certified laboratory for all sampling. State and Federal regulations set strict sampling requirements for various substances. Using a properly certified lab will save time and money in the long run. A good lab will usually furnish all the sample equipment, labels and forms necessary to do a good sampling job.

Samples should be collected by personnel wearing clean, unused latex gloves. During sample collection, particular care should be taken to prevent contamination of the sample and container. A sample collected for laboratory analysis should be placed directly into the appropriate container(s) that are properly labeled.

Samples should be placed into individual airtight plastic bags, and stored in an ice chest approximately 1/4 filled with bagged ice. The containers, labels, and empty ice chests should will be provided by the laboratory.

Exhibit I shows an example of a completed sample label that includes project name, number, and location, sample point and identification, person and company conducting the sampling, sample date and time, and required analyses. The laboratory forms may differ but should include the above listed information.

The sampler should keep a record of all samples collected and show the location of the samples on a sketch of the facility. These records (and sketch) should be kept in afield notebook which should be kept in the project file.

After all necessary containers have been filled, a chain-of-custody form (provided by the laboratory) should be completed. This document should include all the samples collected, with the parameters and analytical methods specified (discussed below). The chain-of-custody form should be signed and dated (along with time relinquished), and sent with the samples to the laboratory. Exhibit 2 shows an example of a completed chain-of-custody document.

The laboratory should be notified approximately two days prior to the sampling to allow time for delivery of the sampling equipment, and should be contacted during the day of the sampling in order to send a courier to pick up the samples or to ensure they know the samples are being delivered by company personnel.

Because of laboratory schedules and sample holding time limitations, sampling should be planned for the early part of the week.

Ensure the lab analyzes the sample and sends the report with the parameters set forth in the permit or regs. For example, if the permit limits are in ppm then the report should state the results in ppm.

Subpart 2

Types of Samples

Selection of the type of sample to take is usually directed by the specific permit or regulation. There are generally two different types of samples used in water or waste sampling.

Discrete or Grab Samples - These are samples collected at selected intervals, and each sample is retained separately for analysis. Usually, each sample is collected at a single point in the discharge or storage container.

Composite Samples - Simple composite samples are those made up of a series of smaller samples know as aliquots. These samples should be taken at regular time intervals or locations in the sampling stream or storage device. It is important they be similar in size and content.

Sampling Locations

The proper location for taking a sample is usually the actual discharge point and is very important in ensuring a representative and accurate analysis. It is also necessary to have awareness of the general character of water flows and knowledge of the variability of the pollutant concentration. Some of the considerations necessary in selecting a proper location are:

- Make sure to sample the proper point. For a combined process/stormwater outfall, make sure to sample below the confluence point.
- Be sure the sampling site provides the information desired. This includes familiarity with the water discharge system including inflow and outflow.
- Make sure there is no cross contamination of the sampling stream from other sources, such as fresh water in a stream or other pollutant discharge points.
- Locate the sample point in a straight length of pipe or discharge conveyance(ditch etc.).
- Make sure the sampling point is easily accessible and safe. Areas with turbulent water flows should be avoided.
- Finally. make sure the sample point is in compliance with any permit, regulation or guidance document that lists specific requirements.

Subpart 3

Water ımpling

Appropriate Sample

Sample should be collected during a dry period when no rainfall is expected for at least 24 hours

Do not sample within 24 hours prior to a weekend or holiday

General Sampling Guidelines

Use clean latex gloves prior to collection of each sample

Use clean sampling containers between grab sample and each composite sample at each location

Collect samples from the center of the discharge flow channel.

Record all pertinent sampling data on the chain-of-custody.

Use preprinted labels provided in the sampling kit to label each sample container.

Seal, label, bag, and ice down each sample immediately after collection

Make certain the laboratory preserves the samples within 24 hours of collection. Some laboratories ship sample containers already containing the required preservative. Call the lab to discuss any special handling requirements or precautions for preserved samples.

Sample Collection

Collect a grab sample for laboratory analysis of oil and grease and field analysis of temperature and pH.

An additional grab sample will be required for analysis of fecal coliform. After filling the appropriate sample containers for laboratory analysis of fecal coliform and oil and grease, immediately measure the temperature and pH of a portion of the sample, and record all pertinent data in the field notebook.

Collect a composite sample. This process involves collecting a minimum of 8 separate samples at periodic intervals during the operating hours of the facility over a 24 hour period, filling a complete set of sample containers for each sample (samples will be composited by the laboratory), and recording all pertinent sampling information upon completion of sampling.

Quality Assurance/Quality Control

Collect a single field blank from each sampling location at some point during a composite sampling event. This process involves pouring deionized water into a clean sampling device and then pouring this water into the two 40 ml glass vials, label and bag the field blank sample, and place the sample in an ice chest to accompany the samples to the laboratory. When collecting field blanks, the vials must be completely filled with fluids, allowing no headspace or air bubbles.

Trip blanks are provided by the laboratory with the sample containers. After all samples have been collected, label and bag the trip blank and place one trip blank into each ice chest to accompany the samples to the laboratory.

Sample Analysis

Each grab sample will be analyzed by the laboratory for oil and grease and a portion of the sample will be analyzed for temperature and pH in the field.

Each composite sample will be analyzed by the laboratory for the parameters required by the permit or regulation such as: BTEX, ammonia, total suspended solids, biological oxygen demand (5 day), chemical oxygen demand, and total organic carbon.

Table B-1 of the Sampling and Analysis Plan summarizes the analytical parameters and method numbers to be included on the chain-of-custody form.

Chain-of-Custody Form

For each sampling event, complete the chain-of-custody form (in ink) to include project name and numbers, transportation information and name of the laboratory. For each sample, the chain-of-custody will include: identity of sample, date and time collected, name and significant collector, number of containers, sample matrix, and analytical requirements.

Sample transfers will be evidenced on the chain-of-custody form by signature of the receiver and relinquisher until final delivery to the laboratory. Place the chain of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit B-3.

Place the chain-of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit A-3.

HAZARDOUS WASTE STORAGE

There are very few compliance requirements with respect to storing hazardous waste. You have only three principal compliance concerns under RCRA:

1. Time limits for storing hazardous waste

2. Quantity limits for storing wastes as an SQG

3. Container and area management standards.

The primary reason for the scarcity of hazardous waste storage requirements under RCRA is that *the storage of hazardous chemicals is regulated in most communities by fire prevention and building regulations.* Decisions concerning inside or outside storage of wastes and procedures for management of the wastes should therefore be made only after talking with your building inspector or fire chief.

Before we move on, let's illustrate the basics. The chart below summarizes the important compliance information with respect to storage time and quantity limits.

Now, let's discuss these important compliance requirements further.

The Basics

Generator Type	Federal Storage Limit	Federal On-Site Quantity Limit
Large-Quantity Generator	90 days	none
Small-Quantify Generator	180 days(or 20 days, if applicable)	>6,000 kg (13,200 lbs)
Very Small-Quantity Generator	No time limit until 1,000 kg, then 180/270 days	<1,000 kg (2,200 lbs)

*** State laws may vary; consult local authorities**

Time Limits

SQGs are permitted to store wastes for up to 180 days.

In most states, the accumulation date begins when the first drop of hazardous waste is placed in a hazardous waste drum or container.

However, some states may allow accumulation to begin on the date the SQG exclusion (100 kg) is first exceeded. Check your state agency to learn the requirements you need to follow.

The 180-day accumulation period may be extended to 270 days if the wastes must be transported over 200 miles to a licensed treatment, storage, or disposal facility (TSDF).

SQGs should *never* store wastes beyond the 180-day (or 270-day) limit because they become subject to burdensome requirements as a permitted storage facility. Inspectors will review manifests carefully to determine that you have not exceeded the time limit. If you have, expect hefty fines.

SQGs that enjoy a busy month and generate greater than 1000 kg of hazardous waste find themselves classified by EPA as a "large-quantity" generator for that month and therefore must: (1) ship wastes off-site within 90 days, (2) meet additional emergency planning standards, and (3) comply with the training requirements.

Plan ahead so that the profits of a "good month" don't disappear meeting additional environmental compliance requirements.

Quantity Limits

You also have another concern: you must keep track of how *much* waste you accumulate. If you exceed the on-site quantities listed in the third column of the previous chart, you trigger additional compliance requirements:

If you are a conditionally exempt generator and accumulate more than 1,000 kg of hazardous waste (five 55-gallon drums), you become classified as an SQG and must legally dispose of your hazardous wastes within 180 days

If you are an SQG and accumulate more than 6,000 kg of hazardous waste (thirty 55-gallon drums), you become a storage facility and must comply with much more-complex TSDF requirements.

Container Management Rules

In addition to time and quantity limits, you must also maintain the integrity of the containers holding your hazardous wastes. The majority of container management standards are *commonsense rules* enacted to protect you and the environment. Here's a list of the rules to follow:

1. Mark each container with the words "Hazardous Waste" and the date when accumulation began (it's also wise to include a clear description of the waste). Standard labels are available for this purpose;

2. Keep containers in good condition;

3. Keep wastes in containers designed to store these materials without rupturing, leaking, or corroding;

4. Handle containers carefully;

5. Immediately replace leaking containers or drums;

6. Keep containers closed except when transferring waste into or out of the container; and

7. Inspect containers for leaks or corrosion every week.

In addition, there are also "area" standards under RCRA. These include:

8. Maintain adequate aisle space between drums to ensure easy access and inspection;

9. Take particular precautions when storing ignitable or reactive wastes—keep such waste away from sources of ignition and store them at a safe distance from each other and from property lines; and

10. Place "No smoking" signs conspicuously wherever ignitable wastes or reactive wastes are stored.

Pay heed to these rules! One of the most frequent violations found by EPA inspectors is a failure of SQGs to meet the container management standards. The most prevalent violations are failure to place the "Hazardous Waste" label on each container, to maintain containers in good condition, to close lids and bungs on containers, and to separate incompatibles.

Some Special Cases

The rules described to this point apply to 100 percent of all SQGs. You must comply. Some generators must also meet additional special storage requirements.

Tanks

If you store hazardous waste in tanks, you must meet, among other standards, the following stringent and expensive requirements:

· Use double walls, external liners, or concrete vaults to provide secondary containment for the tank containing hazardous waste;

· Keep the tank covered or provide at least two feet of space at the top of the tank ("freeboard") in uncovered tanks;

· Utilize waste feed cutoff or bypass systems where waste flows into tanks continuously;

· Install leak detection equipment;

· Inspect the required monitoring or gauging system daily; and

· Comply with applicable National Fire Protection Association (NFPA) codes.

Satellite Accumulation Rule

The *satellite accumulation rule is* a handy exception to the storage requirements. This rule allows firms to collect hazardous waste in the workplace at the point of generation without having to immediately begin the "accumulation clock." To make use of this exception, the following requirements must be met:

· The container cannot exceed 55 gallons;

· The container must be located at or near the point of hazardous waste generation;

· Management of the container must be under the control of the operator of the process that generates hazardous waste; and the container must be labeled "Hazardous Waste" or must use a more descriptive term, such as "spent petroleum distillates."

This special rule may be particularly useful for certain small manufacturing operations and firms that continuously generate small amounts of hazardous waste.

For example, some small electronics firms using small amounts of solvents to clean soldered wafer boards often utilize the satellite accumulation rule. At regular intervals, these containerized wastes are transferred to the hazardous waste storage area.

And Don' Forget ...

Storing hazardous waste increases the risk of accidents, spills, and fires. Therefore, *storing hazardous waste triggers certain emergency planning and response requirements.*

- Identification of at least one employee on the premises or on call as the emergency coordinator

- Posting of emergency contact next to the telephone

- Familiarizing employees with emergency response

Outside Storage

Storage of Hazardous Waste Triggers

There are no EPA requirements that mandate either indoors or outdoors storage. Yet the decision is especially important for many small firms because of space and cost considerations.

Outdoor storage is often the choice for small firms, such as vehicle maintenance shops, because of a lack of space indoors and because commonly found solvent wastes may pose a fire threat indoors. If you store wastes outside, the following safeguards should be met:

. Access to the hazardous waste storage area should be restricted to employees

· The floor of the storage area should be impenetrable to the hazardous wastes

· Any ignitable or reactive wastes should be shaded from sunlight

· Drums and containers should be protected from precipitation

· Applicable flammable and combustible fire codes should be met.

Hazardous Waste Storage ... *at a Glance*

Storing hazardous wastes needn't be complicated if you follow this sequence:

· Store only in containers that are in good condition, and compatible with the waste they contain. Mark each container "Hazardous Waste" and note on the outside the date accumulation began and the nature of the waste contained.

· Inspect containers for leaks or corrosion at least weekly, more often if possible.

· Limit access to the storage area to authorized and trained personnel.

· If storing outdoors, consider that moisture can cause corrosion or react with certain wastes. Indoor storage is usually better.

· Indoor storage is preferred because public access, precipitation, and , heat are not a concern. However, building and fire codes can prove to be a problem. For SQGs that generate small

amounts of hazardous waste, such as the spent dry-cleaner filter cartridges, still residues, and powder residues, storage in a small isolated room or area within the facility may be the best choice.

· Under federal SQG law, store no longer than 180 days (or 270 days if shipping wastes beyond 200 miles). State laws may allow less time.

· As an SQG, never accumulate more than 6,000 kg (about thirty 55 gallon drums). Conditionally exempt SQG's can store only 1,000 kg. Again, state laws may allow less.

And keep storage records—*in a separate location of* what's been stored, how much, when, and by whom. If there's a problem with your stored wastes, this information can prove invaluable.

Drum Separation and Storage

Although it is not a regulatory requirement, it is important to separate empty or "spent" drums from "full" drums. Once a drum is completely empty, tip it over (first making sure that no residue remains), and leave it horizontal so that it will not collect rainwater at its lip. "Dead drums" should be classified as drums that will be (1) reconditioned, (2) returned to a chemical vendor, (3) sold for scrap to barrel refinishers, or (4) disposed of in a landfill (except those contaminated by wastes no longer accepted at landfills).

Empty-barrel management decisions should be made when you are purchasing chemicals. If you are returning drums to your supplier, you should have a purchase agreement that guarantees the use of returnable containers.

Although the use of returnable containers often requires deposits, this is often an SQG's preferred choice. If you are contracting with a barrel reconditioner, you should request that chemicals be supplied in drums of 18-20 gauge steel. Of your disposal choices, your least preferred should be disposing of the container in a landfill.

Dictated by EPA:

a. Mark each container with the words "Hazardous Waste."
b. Keep containers of hazardous waste stored on their sides so that they will not collect water on the top lip.
c. Keep containers closed except when transferring waste into or out of the container.
d. Inspect containers for leaks or corrosion daily.
e. Do not keep incompatible wastes side-by-side.
f. Keep wastes in DOT-specified containers designed to store these materials without rupturing, leaking, or corroding.

Thus far, we've covered the laws that control you as a generator of hazardous wastes, how to determine if you generate such waste, how to notify the government about it, and how to handle the material on-site. Most regulations covering these topics have their basis in RCRA or equivalent state law.

But when it comes to moving wastes off your property, RCRA is not the only set of regulations to be concerned with. The Department of Transportation's Hazardous Materials Regulations must be

complied with as well, before wastes can be shipped to a treatment, storage, or disposal facility (TSDF).

Too often, these regulations are overlooked because the transportation regulations are not spelled out in RCRA, but are, rather, adopted by cross-reference. This means that they are simply referred to, not expansively detailed.

Overview of the DOT Regulations

DOT's Hazardous Materials Regulations cover the transportation of more than 30,000 hazardous materials: hazardous wastes are included in this very large universe of chemicals. The transportation regulations were enacted to ensure that hazardous materials are packaged and contained adequately and that the hazards of the material in a package or container are communicated fully to those who have to handle it. The requirements are not difficult to understand or to comply with.

As in the section on waste determination, most smaller manufacturers will also have their wastes fall easily into DOT classifications. But some small manufacturers with potentially unique wastestreams may have to search the regulations or seek additional guidance.

Pretransport compliance information should be available from your chemical vendor, waste hauler, or state transportation agency.

Specific DOT Requirements

There are six items to address when preparing wastes for shipment. The sequence of decisions that you must make or information that you must obtain and supply is outlined below. Let's briefly explore each step in the process:

Hazardous Waste Determination
|
DOT Shipping Name
|
Hazard Class
|
UN/NA Number
|
Labels
|
Placards

Step 1: Hazardous Waste Determination

Your first step in meeting the pretransport requirements is to determine what manner of beast you are dealing with under RCRA. Is your waste a listed waste or a characteristic waste? What is its code? Is it an F or a D waste; perhaps, it's a K waste. And what is the specific code for that waste? Is it F002 or F004? D001 or D002. Once they've been made, you can move on to what the next government agency—the Department of Transportation—asks of you.

Hazardous Wastes under DOT

What they ask is correctly identifying the waste in DOT terms. You would need to go to the regulations to see if your waste is listed in the DOT Hazardous Materials Table (49 CFR 172).

We will not describe this table in detail, but it is important to know that the with accompanying regulations, is the source of the three most important items of pretransport compliance information:

1. The hazard class to which the material belongs,

2. The shipping name, and,

3. The packaging, labeling, and special requirements.

The DOT Hazard Class

· DOT lists all hazardous materials by hazard class—the general type of material which emergency services would have to handle in an accident. Typical SQG wastes fall into a few of these categories. The table below lists typical classes, into which many wastes fall. Some examples of SQG wastes include the following classes:

Flammable Liquid
Flammable Solid
Organic Peroxide
Flammable Gas
Irritating Material
Poison B
Blasting Agent

Combustible Liquid
Oxidizer
Corrosive
Nonflammable Gas
Poison A
Explosives (Class A-C)
Other Regulated Materials
(ORM: A through E)

As you compare these classes against the wastes you generate, don't become confused that DOT's categories don't necessarily match EPA's categories of characteristic wastes. For example, EPA's "ignitable" wastes may be either "flammable" or "combustible" under DOT, depending on the exact flash point.

Example: A vehicle maintenance shop that generates transmission fluid and parts-cleaner wastes might ship the transmission fluid wastes as a *DOT flammable* liquid while the spent parts-cleaner

solvent would be a DOT *combustible* liquid. This is the case, even though EPA views both as characteristic *ignitable* wastes.

DOT Shipping Name

Once you've identified a waste's hazard class, you now need its shipping name. If a material is in the DOT table, classification by shipping name is easy:

A proper DOT shipping name for a hazardous waste that is listed in the DOT table or that is classified in a DOT hazard class consists of the name of the hazardous material or class, preceded by the word "waste."

For example, the shipping name for spent acetone might be "waste acetone," or the shipping name for spent paint thinners, since no specific chemical name is given, might be "waste flammable liquid."

Many Wastes Are Not in the Table

A hazardous waste that is not identified in the DOT table, and that does not fall neatly into one of DOTs hazard classes, is called an *n.o.s. (not otherwise specified) waste* and is classified as an ORM-E (Other Regulated Material—E) waste by DOT. These "classless" wastes are subject only to DOT marking and general packaging requirements. Examples of ORM-E classified wastes are paint wastes with heavy metals and dry-cleaning waste.

Note: A *recent DOT rule—which has been challenged in the courts— requires a chemical's technical name, rather than n.o.s. entries or trade names, on all shipping papers. This change, as of June 1989, differs from the old way of doing things when the shipping name for these wastes would be "hazardous waste liquid n.o.s." Check with your waste hauler or state agency as to the latest status on this disputed rule change.*

You are advised to verify all DOT shipping names, hazard class determinations, and UN/NA Numbers with your waste hauler or an individual with regulatory expertise before completing the manifest, as other DOT descriptions and identification codes may be applicable in some specialized circumstances.

Dismantlers and recyclers may transport batteries to a scrap processor or recycle without complying with most hazardous waste transportation regulations, provided that no other hazardous materials are being shipped, the batteries are properly braced and properly protected from other material in the vehicle, and the entire shipment is the properly of the shipper.

Steps 2 to 6: Packaging, Marking, Labeling, Placarding

The correct classification of wastes under DOT specifications is the first pretransport requirement. The second task is to meet all packaging, labeling, marking, and placarding requirements. These are summarized below:

Packaging Must Be Compatible and Appropriate to Disposal Means

Wastes must be packaged properly, according to DOT regulations. For hazardous waste, the most important responsibility is choosing a container that is compatible with the waste. While the packaging

Meeting the Pretransport Requirements

Requirements are potentially quite diverse, most SQG waste will be placed in 55-gallon containers, 5-gallon containers, or lab packs. It is important to note that filters, still bags, and contaminated rags can be placed in an open-ended drum which has a lid that closes securely.

In addition to choosing a container that is compatible with the waste, it is important to keep in mind the ultimate fate of the waste. For example, plastic or fiber drums may be preferred for solvent wastes that will be incinerated.

Markings Must Be Complete

For shipping hazardous wastes, the EPA requires special package markings that:

1. Identify the cargo as hazardous waste,
2. Identify the shipper (generator),
3. Show the manifest document number, and
4. Indicate that federal law prohibits improper disposal of wastes. Here's an example of a correctly detailed marking:

Proper DOT
Shipping Name

FORM-A
HAZARDOUS WASTE

Federal law prohibits improper disposal
IF found contact the nearest police or
pubic safety authority or the
U.S. Environmental Protection Agency

Generator Information
Name
Address
City State ZIP
EPA ID No. EPA Waste No .
Accumulation Manifest
Start Date Drum No.

THIS CONTAINER HOLDS HAZARDOUS OR TOXIC WASTE

HANDLE WITH CARE

Meeting the Pretransport Requirement

This is a good place to note that the word "label," in DOT parlance, has a highly specific meaning, involving graphic representation of hazard class. This meaning is detailed below. So while the device shown here may look like a label, its correct term, as DOT defines things, is *marking*.

United Nations/North America (UN/NA) Number Needed

All packages with a capacity of 110 gallons or less—such as 55 gallon drums of hazardous waste—must be marked with not only the proper shipping name of the hazardous waste, but also its United Nations/North America (UN/NA) number. Many wastes will have a specific number or a "class" number, however, there is a single UN/NA number—NA 9189— for the entire "Hazardous Waste, n.o.s." category. The preceding table gives the UN/NA numbers for many common wastes.

This End Up'

Other Regulated Materials (ORMs) may have additional marking requirements. The most important to the SQG is the requirement to clearly mark "THIS SIDE UP" or "THIS END UP" on a container holding liquid hazardous waste.

There are, as you might expect, a multitude of other specific marking requirements for packages, freight containers, and transport vehicles. Rarely, however, do they apply to the typical SQG.

Labels

Markings, as shown above, are placed on hazardous material/waste shipments to identify the contents of the cargo, container, or package and to provide general information about handling. *Labels, as defined by DOT, are graphic representations of the hazard associated with a particular material.* The labels are diamond-shaped and typically communicate the hazard of the package

with an illustration (e.g., chemical spilling), while the hazard class (e.g., corrosive) is written boldly in English across the label.

The hazardous materials table indicates which materials require labels. The responsibility for placing labels on packages rests with the generator.

ORM-E hazardous wastes are exempt from labeling requirements, but other waste classes sent off-site by SQGs will require labels. The label must be printed on or affixed near the marked shipping name.

Placards

The generator is also responsible for providing the transporter with appropriate *placards* which are placed on the ends and sides of motor vehicles, railcars, or freight containers, to quickly and

clearly communicate the hazard of the cargo to emergency responders—or to hazardous materials inspectors.

Placed on the outside of a vehicle, placards are identical to labels in that they are graphic representations of the hazard associated with a particular material. We're sure you've seen these familiar devices. In most cases, the transporter already carries the appropriate placards. The generator should, however, have the placards available *and should ensure that placards are displayed appropriately on the transport vehicle before it leaves the facility grounds.*

Reportable Quantities

Finally, if you're shipping a quantity of a waste that exceeds its reportable quantity, the threshold amount for a substance to be regulated (often 100 pounds), a reportable container label should be affixed to thecontainer or package and the weight of the material, in ranges, marked on the label.

DOT hazardous materials tables give the reportable quantity for most commonly shipped hazardous wastes.

The Hazardous Waste Manifest

The hazardous waste manifest is the key document in keeping a record of the hazardous waste you ship. It's intended to maintain a permanent "paper trail" that shows the nature and quantity of the waste, where it goes, and how it is disposed.

By law, every time you ship any amount of hazardous waste, *(with one key exception involving reclamation, explained below), you* are required to complete a manifest. What's more, no legitimate hazardous waste transporter will accept your shipment without one!

This section includes step-by-step instructions on how to fill out a hazardous waste manifest correctly. But first, it's important to understand what a manifest is, what it does, and why it's so important.

Federal Regulations and the Manifest

In 1980, the federal government began to require manifests for all hazardous waste shipments. This requirement was in keeping with the government's "cradle-to-grave" system of tracking hazardous waste, which makes it possible to track all waste from the point of generation to its ultimate disposition.

The EPA developed the Uniform Hazardous Waste Manifest form to make it as simple as possible to record the required information and track the waste. *(Some states, however, have more-detailed requirements than those that are included on the federal form..)*

Your Never-Ending Liability

The manifest is especially important, as it enables you to keep track of the waste you generate and to make sure it reaches its intended destination. *Remember, your liability does not end just because a shipper takes a quantity of waste off your premises.* By law, you can be held responsible if the waste is mismanaged by a transporter or a treatment, storage, or disposal

facility (TSDF). If a company "twice removed" from you illegally deposits your waste in a landfill site, without your knowledge, you may be held responsible for cleaning up that site years later.

State Requirements Vary

As mentioned above, some states require more detailed information about hazardous waste shipments than the federal government does. Some states require:

- A state manifest document number;
- State-issued identification numbers for the generator, transporter, and receiving facility;
- Telephone numbers for transporters and receiving facilities;

· State or EPA waste identification numbers;

· Specific information about the nature of the wastes being shipped; and

· Special handling codes that indicate how to handle, treat, and dispose of the waste.

It is also important to know that, when out-of-state destinations are involved, there are both "right" and "wrong" manifests to use. While your hazardous waste hauler will hopefully provide you with or help you obtain the correct manifest, here's how the hierarchy works:

1. Generally, use the manifest of the state to which the waste will be *finally disposed;*

2. If the final-destination state does not have its own manifest, use your own state's manifest form;

3. If neither state has developed a manifest, use the Uniform Manifest.

For example, if your hazardous wastes are destined for a facility in Connecticut, you must use a Connecticut manifest, because that state has its own manifest. However, if your facility is located in Minnesota, and your wastes are sent to a recycling facility in South Dakota, you would use Minnesota's manifest because South Dakota does not have its own. However, if your facility is in

North Dakota and you are sending your wastes to South Dakota, you would use the Uniform Manifest because neither state has developed a manifest form.

What Happens to the Manifest

The manifest is used when a generator offers hazardous waste for shipment. The generator offers a sheaf of copies to the transporter when the shipment is accepted, keeping a copy. The rest of the copies go to hazardous waste agencies, other transporters, if any, and the receiving facility.

The entire process is designed so that the waste can be tracked as closely as possible by following it through every party that takes temporary possession.

An essential part of the tracking process occurs when the receiving facility returns a copy of the manifest to the original generator. You should receive this copy within a month or so after the shipment is accepted for transport. It should bear the signature of the operator of the facility.

If you fail to receive a copy of the manifest within 60 days, you must notify the EPA or appropriate state environmental agency of the problem and supply them with a copy of the signed and dated manifest. The agency may then proceed to investigate the whereabouts and disposition of the waste.

Remember, you can still be held liable if your hazardous waste is mismanaged by others, but your correct action in a problem situation will likely weigh in your favor in any ultimate judgment.

Note that, by law, you must keep copies of the manifest on file and available for inspection for a minimum of *three years.* Given the unlimited liability generators bear for mismanaged waste shipments, many firms **never** throw these valuable documents away!

Exception to the Manifest Requirement

SQGs are exempted from having to use a manifest if their waste shipments are reclaimed, under a written agreement, by the original provider of the materials comprising the waste. The agreement must specify the type and frequency of waste shipments. A second condition is that the vehicle(s) the reclaimer uses to transport the waste and then redeliver the regenerated material to the generator must be owned by the reclaimer.

To utilize this exemption, keep the agreement with the reclaimer on file for three years, in lieu of manifest documents.

Completing a Manifest

To guide you step-by-step through the manifest process, we've reproduced a copy of the federal government's Uniform Hazardous Waste Manifest in this section.

At first, this document may look complicated, and the task of completing it may appear to be tedious and time-consuming. In fact, completing it is relatively easy once you've done it a few times. The important concern is to be *complete* and *accurate;* as the EPA or state environmental agency eventually receives copies of every manifest you complete.

· For most generators (those shipping no more than four types of waste and using no more than two transporters), there are only 16 spaces to complete (plus spaces for information that may be required by the state government).

Spaces 17 through 20 are for transporters and the receiving facility to complete. The guide below will walk you through the first 16 questions, and then will describe the other information that needs to be shown.

Doing it by the Numbers

The first thing to notice is the shaded area. This is reserved for special information that your state may require. Remember to check with your state's hazardous waste agency for specific information about these requirements.

Now, let's look at the parts of the manifest required by federal regulation:

Question 1. Enter your EPA ID number, a 12-digit number that should fill the allotted space. If you're unsure about your number, check copies of previous manifests. In rare circumstances, the transporter may use its ID number in place of yours.

The Manifest Document Number in Question 1 is assigned by the generator, and often is already preprinted on the form.

Question 2. Enter the number of this page and the total number of pages in the form, including continuation sheets. If you're only using one page, then it would be "Page 1 of 1." Remember to enter this for every continuation sheet, if any. This information helps make sure that pages don't get lost.

Questions 3. Enter your firm's name, street address, and phone number. If your firm has more than one address, use the address where the firm will receive the return copy of the form.

Questions 5 and 6. Enter the name of your hazardous waste transporter (for example, Safety-Kleen) and its EPA ID number. Every licensed transporter has one.

Questions 7 and 8. If a second transporter will be used, enter its company name and EPA ID number here. A second transporter would be used when the waste is first hauled to a temporary storage facility for later shipment to its ultimate disposal site by another transporter.

Questions 9 and 10. Enter the company name, street address, and EPA ID number of the facility that will receive the waste listed on the Manifest. Your transporter can probably supply this information to you, but remember that it's your responsibility to know and keep records of where the waste is treated and disposed of.

Question 11. Here's where the questions become a little more difficult. To complete this section, you need to supply for each waste the following:

· U.S. DOT shipping name

· Hazard Class

· United Nations/North America (UN/NA) ID number.

Question 11 has spaces for four separate wastes. If you're shipping more than four different kinds, then you'll need to use continuation sheets.

Question 12. For each waste shown in Question 11, enter the number and type of container. Use the appropriate abbreviation for the type of container from the table below:

BA = Bags mace of burlap,DF= Drums, barrels, kegs
cloth, paper, or plasticmade of fiberboard or plastic

CF = Cartons, cases, boxes DM= Drums, barrels, kegs
(including roll-offs) made of metal made of fiber or plastic
DW= Drums, barrels, kegsCM = Cartons, cases, boxes made of wood
made of metal
TP = Tanks, portable
CW= Cartons, cases, boxes made of wood
CY = Cylinders
TT = Cargo tanks (tank trucks)

Question 13. Enter the total quantity, the number of units of measure, for each waste shown in Question 11.

Question 14. For each waste shown in Question 11, enter the appropriate unit of measure. Use the table below to find the right abbreviation for units of measure:

G = Gallons (liquids only) L = Liters (liquids only)

P = Pounds K = Kilograms 1

T = Tons (2,000 pounds) M = Metric tons (1,000 kilograms)

Y = Cubic yards N = Cubic meters

Question 15. Use this space for shipments *within the United States* if there is any special information about transportation, treatment, storage, or disposal, or specific information about the bill of lading.

If the shipment is going *outside* the United States, you must enter the city and state of departure for a foreign country (that is, the last place the waste is located in the U.S. before it is shipped out of the country).

Question 16. You must read, sign (by hand), and date the Generator's Certification, and type or print your name as well. If the waste is not being shipped by highway, cross out the word "highway" in the Certification and write the correct mode of transportation (e.g., rail, air, water). If more than one mode of transportation will be used, write in the additional information. If you're

shipping to a facility outside the U.S., you must also add the following words to the Certification: *"and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."*

Other Information

The first 16 questions really aren't that difficult—only Questions 11 through 14 get a little tricky, and you'll soon learn how to complete those quickly and accurately. But even though your task may end after Question 16, it's important to understand what information is supposed to go in the other spaces.

Questions 17 and 18. Each transporter must acknowledge receiving the waste by signing and dating the appropriate space. If a second transporter is involved, that firm will complete Question 18. If there are more than two transporters, then continuation sheets will be needed (see below).

Question 19. This space is for a representative of the receiving facility to note any discrepancies between the waste as described by you and the waste actually received at the facility. The operator of the receiving facility must note any such discrepancy—which shows why it's so important for you to answer Questions 11 through 14 accurately.

Question 20. The representative of the receiving facility should print or type his or her name, sign it by hand, and date the signature to acknowledge that the shipment was received.

Questions 21 through 23 apply to Form 8700-22A, which is the continuation sheet that must be used if there are more than two transporters or more than four different kinds of hazardous waste in your shipment. As with the first page of the Manifest, there are shaded spaces for state requirements that may apply.

Questions 21, 22, and 23. These are the same as Questions 1, 2, and 3 of the Manifest. Be sure they're completed, and that the page number is correct in Question 2.

Questions 24 through 27. These are for the names and ID numbers of additional transporters. For Question 24, you would write the number "3" in the blank space in "Transporter Company Name," because Transporters 1 and 2 were already listed on the first page of the Manifest.

Questions 28 through 32. These spaces correspond to Questions 11 through 15 of the first page of the Manifest, and apply to the types of waste you did not have room to list on the first page.

Questions 33 and 34. These spaces are to be completed by the transporters as with Questions 17 and 18 of the first page.

Question 35. This space will be completed by the receiving facility operator if any discrepancies are noted between your descriptions of the waste entered on this page and the condition in which the wastes are received.

How to Select a Hazardous Waste Transporter

Unless you choose to transport your hazardous waste yourself—a complex and usually expensive proposition, you'll need to find a qualified contractor to haul your waste to its final resting place.

There are several types of transporters and treatment, storage, and disposal facilities (TSDFs) from which you may choose:

· Transporters who pick up and haul wastes

· Transfer and storage facilities (also known as waste brokers) that collect wastes from several SQGs and combine them to make shipments large enough to take to disposal firms

· Treatment, storage, and disposal firms that ultimately dispose of the waste

· Firms that provide complete service, from pickup to disposal.

While the most important objective is to obtain the services of credible and certified firms, many SQGs prefer firms that provide full services. The reason is simple.

Complying with environmental regulations is not typically a full-time job at a smaller business. Those responsible for compliance need all the help they can get with respect to: the manifest, hazardous waste determinations and lab analysis, pickup scheduling, and waste minimization.

There's another reason small firms often prefer a full-service vendor. There's one less firm to audit.

Audit?

That's right. Before you send your hazardous wastes off-site, you need to *absolutely know* that the firm(s) transporting and disposing of your firm's wastes are credible and reliable. This chapter is a guide to the information you need to obtain about the Firms that you're thinking about hiring to manage your wastes off-site.

Audit Responsibility

The primary responsibility for conducting audits of these firms is the Corporate EH&S Department. An approved list of authorized firms will be maintained and distributed. If y0u have a firm that may be included on the list, contact EH&S and an audit will be scheduled.

The following information is a description of the audit process.

Why Audits Are Important

Before we address how to select a transporter and a disposal company, it's important for you to understand why it is so important that you choose the right firm. It's because *your liability as a generator does not end when the hazardous waste leaves your property.*

If a transporter or TSDF violates environmental laws and regulations, the EPA can hold you—the original generator of the waste—responsible for cleaning up the site. The entire site—despite the

fact that you fully complied with the law! In more than a few cases, small firms have been bankrupted by this liability system.

This is why you absolutely *must* diligently evaluate your contractors before a poor selection causes you major financial woes. At a minimum, you need answers to such questions as:

Has the firm secured all proper federal and state environmental permits?

· Is the firm in compliance with all of its permits?

· Is the company financially stable and properly insured?

· What past, current, or pending lawsuits or complaints, if any, have been filed against the firm?

· What types of treatment, disposal, and storage methods are used? (For example, dry cleaners would be interested in a firm's ability to recycle or incinerate F002 or D001 wastes.)

To make a wise selection, even the *smallest SQGs* need additional information about a waste handler's recordkeeping, standard operating procedures, value-added services, etc.

For example, will a transporter or TSDF be willing to give you the detailed information you need? Yes, he will—if he's the type of contractor who is knowledgeable, reliable and in compliance with the law.

If your prospective waste handler does object, or can't answer your questions, then chances are he also can't provide the safe and reliable services that you need and have a right to demand.

What if you already have a contract with a company that appears to be providing satisfactory service? Should you still perform a thorough audit? Again, the safest answer is "Yes." A reliable contractor should not object to providing the information, especially to an existing client.

Beginning the Audit

When beginning an audit of a hazardous waste contractor, you should quickly establish why the audit is required and what kind of information will be expected. The initial discussion should be held in the spirit of cooperation and might begin something like this:

"I know you understand what could happen to both of us if anything were to go wrong while you're handling our hazardous wastes. Because the stakes are so high, I'm required by my company to conduct an audit of your business, including the financial condition of your company. I need you to answer my questions, and want to assure you that the information you provide will be held in the strictest confidence. I also want you to understand that my company requires this information of any contractor considered to handle our hazardous wastes."

To make the process as smooth and efficient as possible, some firms develop a questionnaire (see end of section for a sample) for the contractor. If you and the contractor both understand what will be required from the very beginning, then the audit should proceed smoothly.

Getting Information Quickly and Easily

Even though audits should be as detailed as possible, most SQGs simply can't afford the time and money it takes to conduct exhaustive investigations. If time and money are a problem, then your

goal should be to collect as much information as possible as easily as you can, so long as you know that the information is reliable.

Federal, state, and local governmental agencies that regulate hazardous waste are usually excellent sources of reliable information. They know who their area hazardous waste contractors are, and how well they comply with regulations and permits.

Don't hesitate to contact the local offices of these agencies and ask for their help. Tell them that you're trying to make sure that your hazardous waste transporter or TSDF is fully qualified to do the job, and ask for any information they can provide, on or "off the record," on the companies you're auditing.

Other good sources of "reference" material are trade associations, professional organizations, or other businesses that generate similar wastes. If you have selected a firm to evaluate, they should provide you with reference firms similar to yours whom they service. Give these references a call.

Auditing Transporters

The lead federal agency in regulating hazardous waste transporters is the Department of Transportation. DOT has announced that it will audit all transporters, and give each of these firms ratings of Satisfactory, Conditional, and Unsatisfactory. (A "Conditional" rating will mean that the transporter needs to improve certain operations, but these problems are not serious enough to shut the firm down.)

You may not want to deal with any transporters who receive "Conditional" or "Unsatisfactory" ratings. But it's **important to remember that not all transporters rated "Satisfactory" will**

necessarily be right for you. Your specific wastes, their scope of services, and geographic location are all important factors in choosing a transporter.

What You Need to Know

Sample audit forms for hazardous waste transporters and TSDFs are included at the end of this chapter, along with rating forms you can use to tell whether or not the contractor will do a good job. (If the transporter and the TSDF are part of the same company, then much of the information can be repeated on both forms.)

Site Condition (TSDF's Only)

When auditing a TSDF, you should, if at all possible, personally visit the site of the company's hazardous waste operations. For many SQGs, wastes will be transported to a "transfer" station and then to a solvent recycler, incinerator, or landfill. If the ultimate disposal facility is in another

state, it may be impractical to visit this site. In this situation, be sure to visit the transfer facility and submit a questionnaire to the ultimate disposal facility.

At the site, first take a look to see if significant hazards or risks are apparent. Note the condition of buildings, piping systems, storage tanks, etc. Do any of these facilities appear to present

hazards? Determine the types of wastes normally handled and sorted by the facility on-site. How does this information compare with the activities allowed by the company's permits?

Note also what surrounds the site. Is it near bodies of water—where improperly handled waste can cause widespread contamination? What other businesses or other development could be impacted by an accident or incident? These are factors to consider.

When auditing a hazardous waste transporter, the condition of the vehicles is an indicator of the company's professionalism. Ask to see maintenance records to determine if they've been serviced on a regular schedule. Note if the vehicles are parked in a secure place when off the road;

determine how frequently vehicles are cleaned and whether cleaning complies with regulations governing disposal of waste residues.

Review the company's driver-training program, since hazardous waste transporters are required by law to provide very specific training to their drivers. Drivers should be familiar with regulations governing the transportation of hazardous materials, and be trained in emergency response procedures.

Make sure that proper emergency equipment is kept on the vehicles. This should include a spill boom, spill pads, neutralization materials, personal protective equipment, communication equipment, hazardous materials guidebooks, warning signs or devices, first-aid kits, and fire extinguishers.

Ask for a description of the company's safety program, and an accident history of the company, including both vehicle accidents and those relating to workplace safety. Find out if any corrective measures have been taken to reduce accidents.

Check to see that waste containers are in good condition and are properly labeled, and that the vehicles themselves bear placards that show what kind of hazardous materials are being transported.

At the TSDF, inquire about emergency procedures. If your container leaks, what steps are followed, what agencies are notified? Ask to see the company's first-aid and medical resources, and request inspection of the written emergency plan.

As a final observation, form an impression of the overall working atmosphere. If employees are friendly and professional in their manner and appearance, this usually indicates good management.

Financial Condition

Obtaining accurate financial information about the transporter or TSDF is very important. A company that is in poor financial condition may be tempted to save money by cutting corners in complying with environmental regulations. Review the financial strength of the company by

evaluating the firm's financial statements and/or Dun & Bradstreet (D & B) reports. These should be available from the company or they may be obtained through your local library.

Ask for copies of insurance certificates as proof of adequate coverage for the types of work the contractor does. Make sure that the policies are current, and that coverage complies with governmental requirements.

The company should be willing to tell you about any complaints or lawsuits that may have been filed against it in the past, or that are currently pending.

Evaluating the Contractor

If you have obtained as much information as possible about the contractor and recorded it on the audit form, you are now ready to evaluate the transporter or TSDF.

We have devised a rating system to assist you in evaluating firms. In this rating system, four points are assigned for each "Good" rating, two points are assigned for each "Fair" rating, and no points are given for "Poor" ratings or categories for which no information has been provided. An overall score of less than 90, or any category that receives a "Poor" rating, is a strong signal that potential problems may exist within a company.

Recordkeeping and Reporting Requirements

Good records are a must for meeting hazardous waste management requirements It's really no different than the fundamental rule governing you and the Internal Revenue Service; you must be able to demonstrate to the government that you complied with the law. A wise rule of thumb is the following:

Keep all records, reports, documentation, letters to you, and letters from you with respect to environmental compliance for a minimum of three years.
More specifically, SQGs must keep the following three types of RCRA records for at least three years:

1. **Manifests and signed copies from designated facilities.**
Be sure to also retain any reclamation contractual agreements for at least three years after the termination or expiration of the agreement. As we've said earlier, with the unlimited liability

generators live under for hazardous waste incidents, it's advisable to keep these records indefinitely.

2. **Exception reports .**
You are required to retain copies of "exception reports" sent to the EPA or a state environmental agency in the event that you did not receive a return copy of the manifest from the designated facility within 60 days. Never trust the EPA or state agency to keep track of your correspondence. It's your responsibility to keep accurate records.

3. **Test results**

Keep track of any laboratory results, including the type of sample, testing method, testing results, name and address of the testing lab, and the date of analysis. Additionally, file any compliance guidance materials—such as magazine articles, notes from EPA hotline conversations, EPA guidance manuals—used to make a hazardous waste determination. These supporting documents will not absolve you of guilt if you violate the law, but they should demonstrate that your violation was unintentional and that you made a good-faith effort to properly classify your wastes.

Additional reports may have to be filed under RCRA, depending on your business and activities at that business. If you own or operate an underground storage tank, you must retain records of notification and, if applicable, release reports, Corrective action, or closure plans.

In the future—if you do not already do so—you will also be required to keep records of: (1) release detection performance, (2) corrosion protection, (3) upgrades or repairs, and (4) closure.

Any reports of accidental releases of hazardous waste that were filed with the EPA or state should be kept on record for at least three years. And records of recycling activities, while not required, should be retained in order to demonstrate compliance with the law.

SQGs that store hazardous waste for longer than 270 days, treat hazardous wastes, or who operate a hazardous waste tank must keep more extensive records.

Track State Requirements

SQGs are exempt from the federal requirement to submit biennial reports. These reports—due every two years from generators of larger amounts of hazardous waste—provide the EPA with information about the amounts and types of wastes generated in this country and the manner in which these wastes are disposed.

SQGs in certain states, however, may be required to submit the same type of information to the state agency in **an *annual*** waste-generator report. The data for the report can easily be gleaned from copies of manifests, although information on waste reduction and minimization efforts, if required, may involve some additional thinking or documentation. Once again, see the state section of this book and/or obtain a copy of the state SQG regulations, or call your state environmental agency to determine if you should submit an annual report.

Some Helpful Hints

Keeping track of RCRA compliance should not be a considerable burden. Any successful business maintains an accurate record of transactions, letters, bills and correspondence. RCRA recordkeeping is just one more file.

However, the manifest, exception reporting, and test results files may be much smaller than comparable files you must keep for the Hazard Communication Standard (also known as the Right to Know law) or the Emergency Planning and Community Right to Know Act (commonly called SARA Title III).

To assist you in setting up an appropriate system for your smaller business, we have identified *possible* topic headings for file folders that are applicable to vehicle maintenance shops,

dry-cleaners, and light industry/small manufacturers. Choose only those files that are important to your business and compliance needs.

Correspondence with Environmental, Safety, and Health Agencies

- State hazardous waste management agency
- EPA

- OSHA
- Other state environmental agencies
- Other state employee safety agencies or boards.

Resource Conservation and Recovery Act

- Manifests and contractual reclamation agreements
- Exception reports
- Testing results
- Copy of an emergency or "Contingency Plan"
- Spill or release reports
- Underground storage tank compliance records
- Audits
- Agency inspections.

Other Key RCRA Records to File

- Records of on-site recycling activities, to document: (1) the amount of material, at the beginning of the year, (2) the amount purchased over the year, and (3) the amount remaining at the end of the year.
- Records of used-battery accumulation and recycling activities (you should be able to show that you recycled 75 percent of these materials in a calendar year)
- Records of used-oil accumulation and recycling activities
- Training documentation, if you conducted (formal or informal) employee hazardous waste training.

Occupational Safety and Health Act

- Accident reports
- Material safety data sheets
- Training documentation for Hazard Communication Standard
- Hazard Communication Plan.

Emergency Planning and Community Right to Know Act

· Emergency planning reporting (e.g., letter notifying the state that you have present one of the listed "extremely hazardous substances" in excess of its prescribed thresholds and any correspondence with the Local Emergency Planning Committee (LEPC)

· Spill or release notification reports (can be combined)
· Chemical inventory reporting
· Toxic chemical release reporting.

Clean Air or Clean Water Act

· Folder for each specific permit requirement (e.g., NPDES, pretreatment, NSPS, NESHAP).

City or State Environmental Laws

· Any additional requirements.

A few last thoughts on recordkeeping:

Common Sense

First, plan on retaining records for more than three years. It never hurts to have these records, and it may cost you dearly if you discard files and later discover that, for example, the town accuses you of, years ago, illegally disposing of hazardous wastes in the town dump.

Second, if you use a word processor, be sure to keep both a computer file and a "hard-copy" record of your correspondence.

Third, it may be helpful to photocopy correspondence with governmental agencies and to place one copy in the appropriate agency file (e.g., EPA) and the other copy in the appropriate "topic" file (e.g., manifests).

Fourth, an effective filing system will impress any inspector! Its converse: madly scurrying around an office to find an exception report or manifest will not! In even the smallest of offices, be sure that *someone*— yourself, a secretary, the environmental coordinator—is in charge of keeping the records.

Section7

Facility Waste Inventory

INSTRUCTIONS

General	This form is used to keep a listing of all the wastes generated at a facility. The name of the facility should be filled in at the top of the page.
Number	Use any numbering system you prefer. These numbers are not referenced anywhere else in the WMP.
Waste Name	If the waste name is listed in Section 5, use that name. If not, use a suitable name. The next update distribution will include the name in the table in Section 5.
Quantify / Frequency	This is an estimate of the amount of waste generated and the period of time it is generated in. For example, 1000 lbs per week or 4000 lbs once a year. The number should be revised when better estimates are available. Every effort should be made to keep these numbers in pounds to enable totals to be calculated for WPC.
Process	Give a brief description of how the waste is generated. Sometimes the way a waste is generated or the process producing the waste may effect the way the waste is classified

Name of Excel file containing form: Inventry.xls

Section 8

Facility Waste Management Summary

INSTRUCTIONS

General	This form is used to record how each waste is being managed. The name of the facility should be filled in at the top of the page.
Waste Name	If the waste name is listed in Section 5, use that name. If not, use a suitable name. The next update distribution will include the name in the table in Section 5.
Waste Classification	This space should be used to record the waste classification as indicated on the Waste Identification Sheets. If no Identification Sheet is available, contact the ES&H Coordinator of Corporate EH&S for help in getting the proper classification.
Responsible Person	This person will typically be the person generating the waste. For example, the maintenance supervisor may be responsible for shop waste, the operations supervisor for amine waste, etc.
Management Method	List how the waste is managed; landfill, recycled, disposal well, treated etc
TSDF Name, etc.	List the name and address of the treatment, storage, or disposal facility. Be sure to list the contact name and phone number.
Transporter Name, etc.	List the name and address of the transportation company. Be sure to list the contact name and phone number.

Name of Excel file containing form: Summary.xls

Section 9

Facility Shipment and Disposal Log

INSTRUCTIONS

General

This form will serve two purposes: (Fill in Facility name at the top).

1. This form is used to record waste that is treated or disposed of onsite or shipped offsite for treatment, storage or disposal. Each load or batch should be recorded. Wastes which are produced and disposed of continually should be recorded periodically but at least once a month.
2. This same format should be used to report waste activity to EH&S. The only difference will be that totals for each waste with the same management method will be listed. For example , a facility disposes of 200 drums of oil filters each weighing 250 lbs during the month in four shipments. Half the drums are sent for recycling, and half to a landfill. The monthly report would have two lines (1 for recycling & 1 for Landfill) for the filters each showing 25,000 lbs.

Date

Date waste is disposed or shipped. on the monthly report just list the month the report covers.

Waste Name

If the waste name is listed on the Waste Inventory sheet, use that name. If not, use a suitable name. It is important to be consistent in using the same name for a given waste.

Management Method

List whether the waste was recycled, landfilled, deep well injected, etc.

Quantity Disposed

List the quantity recycled, disposed, etc. in pounds. If the quantity is easily available in gallons, gallons may be used to log individual shipments. However, the total gallons for the month must be converted to pounds for the monthly report

Total Cost

List the total costs associated with the shipment. Include transportation, treatment, disposal, profile fees, acceptance fees, analytical fees, and any other costs. Do not include amounts for work completed by Warren employees

Name of Excel file containing form: Shipment.xls

Section 10

Facility Waste Drum / Container Log Sheet

INSTRUCTIONS

General Drums or containers are often used to collect and store wastes. This form provides a way to track these drums and containers. Drums or containers filled and shipped immediately do not need to be listed here, although they can be if desired. This form is intended for those drums or containers stored onsite. Put facility name at top of form.

Number Any numbering system may be selected as long as each number is unique. The number should be marked on the drum. For example, 98-06 could be the number assigned to the 6th drum used to store waste during the year 1998

Description Provide a description of the container contents. Include a physical description, particularly noting if any free liquids are present. The description should include the waste name as listed on the facility inventory. If a drum is empty, list it as empty and describe what the drum last contained

Location Where is the drum being stored.

Date Stored Date the drum is stored.

Date Shipped List the date the drum is shipped or disposed.

Comments List any additional comments.

Name of Excel file containing form: Drums.xls

SECTION 7

VADA WASTE STREAMS

Vada Compressor Station
Waste Streams

ITEM	TYPE	EXPECTED AMOUNT	SOURCE	DISPOSAL METHOD
Filter	Dust	600 Cartridges/yr	Oil, Gas filter	Waste Management
	Oil, Product		cases, Air intake	of SE New Mexico
	Air, TEG (sock)		cases, Gas Dehydration	
Plant	Paper, Wood,	5 tons/yr.	Office, Shop etc	Waste Management
Trash	Cardboard,			of SE New Mexico
	Household items,			
	etc.			
Oil/Scrubber	Oil sludge, Sand,	Infrequent, varied	Scrubbers, Oil	Gandy Marley, Inc.
Tank Bottoms	Dirt, Scrubber	amounts	Tanks	&
				CRI
Solvent	Naptha	100 gals/yr	Parts washing	Oil Recovery
	Cleaning Fluid			Tank (Recycled)
Steel Drums	Lube oil, Antifreeze,	Infrequent, varied	Outside vendors	Emptied and
	Chemicals	amounts		returned to
				vendor.
Concrete		Infrequent, varied	Various in-plant	Waste Management
		amounts		of SE New Mexico
Activated Alumina,	Solid Particles	Infrequent varied	Air Dehydrators	Waste Management
Silica Gel		amounts		of SE New Mexico
Soil contaminated	N/A	Infrequent varied	Pipeline Leaks	NMOCD Permitted
with hydrocarbons		amounts	NGL Liquids	Landfarm
Used Oil	Lub Oils	1500 bbls/yr.	Engines	Added to Scrubber
				Oil Sales
Scrap		Infrequent varied	Maintenance,	Sold to Scrap
Metals		amounts	Construction	Dealer (Recycled)
Produced	N/A	Infrequent varied	Gas	Trucked to
Waste Water		amounts	Compression	SWD

SECTION 8

STORMWATER RETENSION BERM

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555 • Fax 915.688.0552
www.dynegy.com

DYNEGY

December 27, 2000

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: GW-027
Vada Compressor Station
Discharge Plan Renewal Conditions

Dear Sir:
Please find attached responses to conditions for renewal as described in your letter dated October 2, 2000:
1) A clean-up plan and the plan to install containment around the wastewater disposal tank area as described in plan approval conditions 14 A and B.
2) The most recent water analysis for the on-site water well as requested in plan approval condition 14 C.
3) A stormwater run-off plan as requested in plan approval condition 15.

Dynegy is in the process of contracting the underground drain line pressure testing work and requests an extension of time to complete. Gandy Corp of Tatum, NM will perform this work. It will be scheduled to occur in January. The OCD will be notified at least 72 hours prior to testing as described in condition 9.

Please call with any questions or concerns. (915) 688-0542.

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs w/attachments
Vada Discharge Plan Manual w/attachments
Clark White w/o attachments
Tim Jordan w/o attachments

14 A.: Waste Water Disposal Tank Remediation Plan Dynegy Vada "GW 27"

1. Tank Removal
The existing tanks and all ancillary piping will be removed and used for other purposes.

2. Remediation
The contaminated soils located adjacent to the Waste Water Disposal Tank will be excavated to a depth sufficient to comply with the TPH and BTEX concentrations specified within the Oil Conservation Division *"Unlined Surface Impoundment Closure Guidelines"* dated February, 1993. Depth to groundwater is estimated to be between 50-100'; therefore the soils will be excavated to a TPH concentration of <1,000 ppm, a benzene concentration of <10 ppm and a total BTEX concentration of <50 ppm.

The soils may be sampled on-site using field instruments, however the results of a four side wall and bottom sampling will be collected for analysis in accordance with WEQP-77 and submitted to a laboratory for analysis. The Hobbs office of the NMOCD will be notified at least forty-eight hours in advance of the confirmation-sampling event. All excavated soils will be transported to the Gandy-Marley Landfarm for disposal. A signed manifest shall accompany each shipment and be included within the final closure report.

2. Replacement Soils
Clean soils will be used to replace the excavated material and the site re-contoured to match the existing slope.

3. Report
At the conclusion of the remediation project, the NMOCD Hobbs office will be provided a closure report containing the following minimum information:

- Photograph of the site prior to closure
- Photograph of the site at completion of the project
- Disposal manifests describing the volume of materials removed from the excavation
- Chain of custody and laboratory analytical analysis for TPH, BTEX and chlorides from soil samples taken from each side and bottom of the excavation.

14.1 B.: Waste Water Storage Tank Containment Plan Dynegy Vada "GW-27"

1. Berm

In accordance with NMOCD Rule 310A, Dynegy will construct a containment berm surrounding the 210 bbl. storage tank. The berm will be 25' X 25' X 3' and contain 1,875 cubic feet. Less the volume of the tank, (253.6 cu. ft.), this volume is sufficient to represent a capacity one third larger than the capacity of the enclosed tank.

M = minimum net storage area = ((1.33)(B*C)) + T
B = bbl oil = 5.61458 cu. ft.
C = storage capacity of tank
T = 15' dia. storage tank = 23.591 cu. ft. / ft.

2. Liner

A 20 mil polyethylene liner will be laid atop the area contained within the containment berm and be extended to cover the crest of the berm. The liner will be covered with pea gravel to resist UV degradation.

STATE OF NEW MEXICO
SCIENTIFIC LABORATORY DIVISION (HED)
700 Camino De Salud, NE P.O. Box 4700
Albuquerque, New Mexico 87196-4700
(505) 841-2537

MICROBIOLOGICAL WATER REPORT

Lab No. 1159
Date Received 6-7-94
Time Received 9:55A

SAMPLE IDENTIFICATION

Water Supply System Name: Warren Petroleum - Vada
SLD User Code No.: 6 2 0 0 0
County: Lea
WSS Code No.: 9 3 5 1 3

SAMPLE COLLECTION

Date Collected: Mo 6 Day 0 Year 6 9 4
Time Collected: 3:20 ☐ AM ☒ PM
Collected By: C. Klein
Collection Location: Kitchen

WATER SYSTEM

Check One:
☐ Community ☒ Non-Community ☐ Private Well
☐ Other - Specify _____
(999)
Disinfected? ☐ Yes ☐ No Residual: _____ mg/L

TYPE OF TEST

Check One:
☒ Total Coliforms - MF ☐ Fecal – MF
☐ Total Coliforms - P/A ☐ Fecal – MPN
☐ Other _____

TYPE OF SAMPLE

Check One:
☒ Routine Sample ☐ Special Sample
☐ Check Sample ☐ Monitoring Sample (EID use only)

Send Report to the following (Names and Address)

Warren Petroleum - Vada Plant
P.O. Box 1689
Lovington, NM 88260

LABORATORY RESULTS

Type of Test

Total Coliforms per 100 ml: MF ☒
Present ☐ Absent ☒ P/A ☐

Fecal Coliforms per 100 ml:
Present ☐ Absent ☒

Fecal Coliforms: _____ per 100 ml MF ☐
Fecal Coliforms: _____ per 100 ml MPN ☐
Other _____

UNSATISFACTORY SAMPLE

If one of the following is checked, please resample.

☐ Sample too old. Not received within _____ hours of collection.
☐ Temperature violation (above 10° C)
☐ Form incomplete. See circled item.
☐ Date discrepancy.
☐ Leaking sample.
☐ Quantity insufficient for testing.
☐ Quantity too great to permit agitation.
☐ Other _____

Analyst TO
Date reported 6-8-94

SLD 821 (Rev. 1/91)

Larson & Associates, Inc.
Environmental Consultants

December 18, 2000

Mr. Cal Wrangham
Regional Team Advisor
Dynegy Midstream Services, L.P.
6 Desta Drive, Suite 3300
Midland, Texas 79705

Re: Addendum to Groundwater Discharge Plan GW-027, Storm Water Management Plan, Dynegy Midstream Services, L.P., Vada Gas Plant, Lea County, New Mexico

Dear Mr. Wrangham:

Per your request, Larson and Associates, Inc. (LA) has prepared the attached addendum to Groundwater Discharge Plan GW-027 for the Dynegy Midstream Services, L.P. (Dynegy) Vada Gas Plant, located in Lea County, New Mexico. The addendum provides a storm water management plan that was required by the New Mexico Oil Conservation Division (NMOCD) following its review of the renewal application on October 2, 2000.

Larson and Associates, Inc. is pleased to provide these services to Dynegy. Please call me at (915) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.

Mark J. Larson, CPG, CGWP
President

Encl.

2501 Learmont Drive ◆ Midland, Texas 79705 ◆ Ph. (915) 687-0901 ◆ Fax (915) 687-0456

ADDENDUM TO GROUNDWATER DISCHARGE PLAN GW-027
STORM WATER MANAGEMENT PLAN
DYNEGY MIDSTREAM SERVICES, L.P.
VADA GAS PLANT

Dynegy Midstream Services, L.P. (Dynegy) has developed a comprehensive Spill Prevention Control and Countermeasure (SPCC) Plan for its Vada Gas Plant, located in Lea County, New Mexico. The SPCC Plan, included as an appendix to Groundwater Discharge Plan GW-027, presents mechanisms in place to prevent potential non-point source discharges of materials used or wastes generated at the facility, and storm water control. Secondary containment structures have been installed to prevent accidental discharge of materials used or wastes generated at the facility. An earthen containment area measuring approximately 300' x 126' has been constructed near the southwest (down slope) corner of the facility to prevent offsite migration of storm water or products (i.e., condensate, engine oil, gasoline and methanol) from the process area. An earthen dike approximately 18" high along the west and south sides of the containment area provide capacity for approximately 10,000 barrels (424,145 gallons). Attachment A presents photographs showing the containment area.

Secondary containment structures of earthen or concrete material are present at potential source areas to collect and store leaks, drips, spills and storm water. Secondary containment structures are present at the following potential sources:

- Solvent storage tank;
- Slop oil storage tanks;
- Soap and corrosion inhibitor storage tanks.

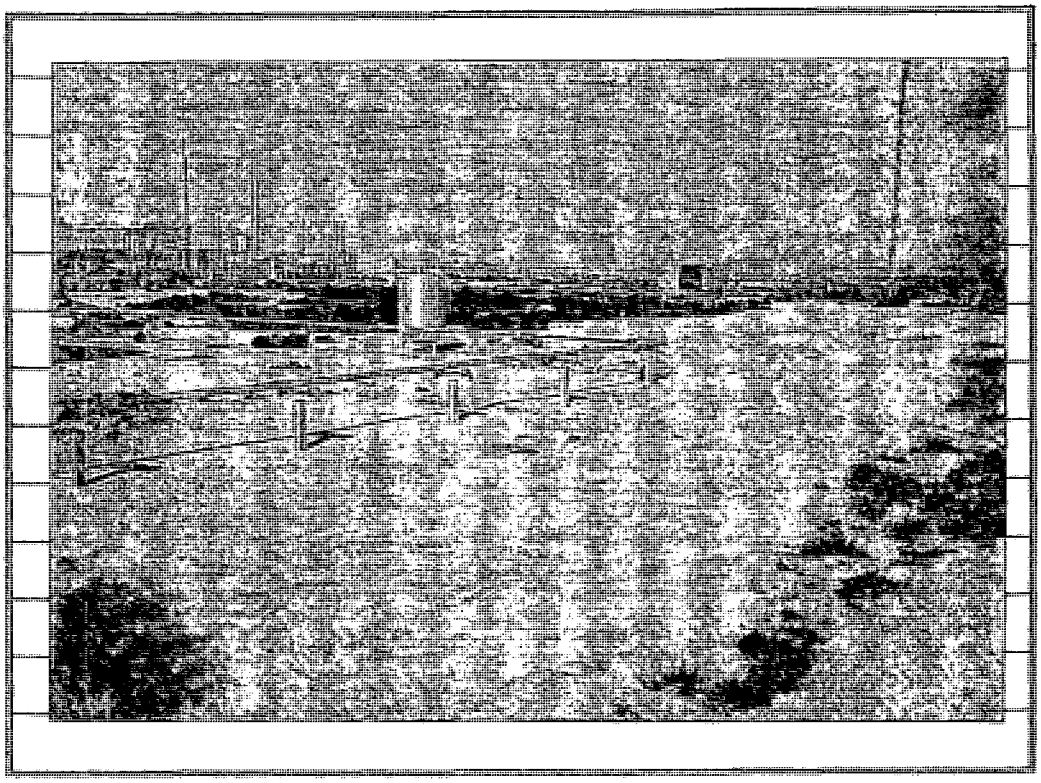
The secondary containment structures have the capacity to contain from 1.2 to 3.25 times the volume of tanks contained in the structures.

In accordance with the SPCC Plan, any oil or product collected in the containment area or secondary containment structures is absorbed with booms or other similar equipment, and returned to the facility. Storm water collected in containment area and secondary containment structures is allowed to evaporate or drained, unless hydrocarbons are present. Storm water containing hydrocarbons, based on visual identification of a sheen or floating layer, is picked up with a vacuum truck, and disposed in a permitted well.

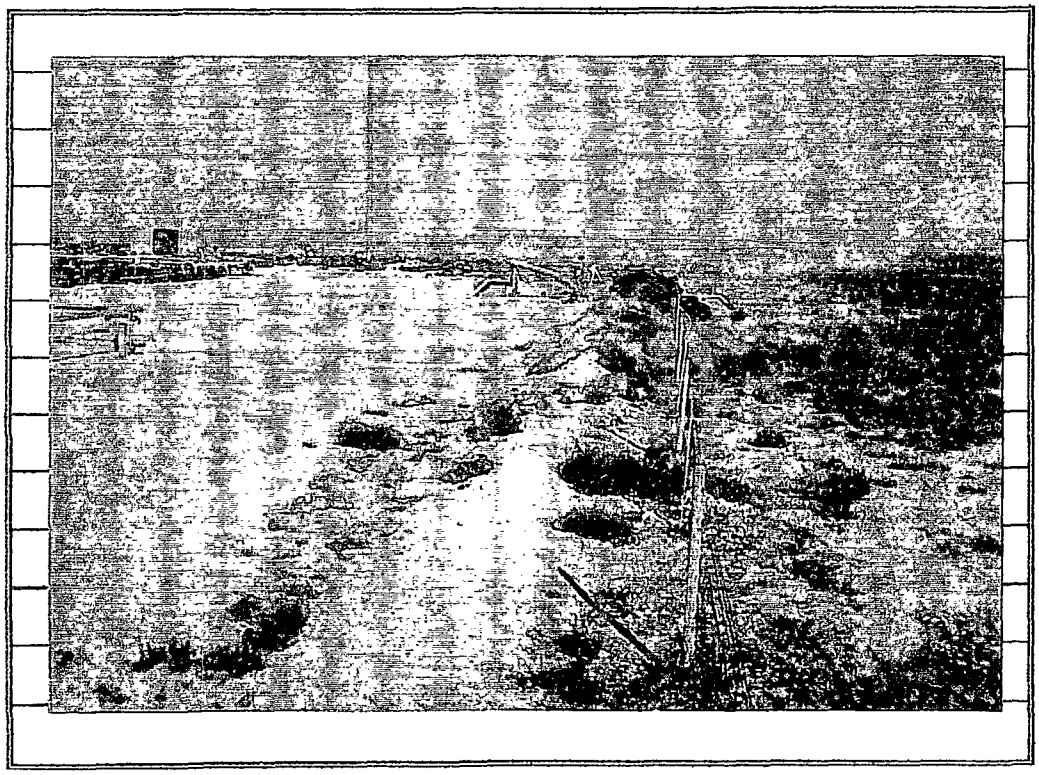
Attachment A

Photographs

PHOTOGRAPHS
DYNEGY MIDSTREAM SERVICES, L.P.
VADA GAS PLANT



1. Storm Water Containment – Southwest Corner of Facility



2. Storm Water Containment – Southwest Corner of Facility

SECTION 9

CLOSURE PLAN

CLOSURE PLAN-VADA COMPRESSOR STATION
AS PART OF THE
DISCHARGE PLAN

Pursuant to WQCC 3:107.A.11, Targa will take all reasonable and necessary measures to prevent the exceedance of WQCC Section 3103 quality standards should Targa choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 11/20/09

or cash received on _____ in the amount of $ 100 00

from Navajo Gas Processors LLC

for GW-27

Submitted by: Lawrence Romero Date: 12/1/09

Submitted to ASD by: [signature] Date: 12/1/09

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 _____

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
Phone 432-688-0555
Fax 432-688-0552
www.dynegy.com

DYNEGY

Certified Mail: 7004 1160 0000 4500 3298

November 1, 2005
Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Dear Sir:

Please find attached the signed copy of the conditions of approval and the check for the renewal flat fee for a compressor station in the amount of $1700.00.

Please call me with any questions, Office (432) 688-0542 Cell (432) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Mr. Chris Williams, Hobbs District 1 Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

September 29, 2005

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan Renewal GW-027
Dynegy Midstream Services, L.P.
Vada Gas Compressor Station
Lea County, New Mexico

Dear Mr. Wrangham:

The groundwater discharge plan renewal application GW-027 for the Dynegy Midstream Services, L.P. Vada Gas Compressor Station located in of Section 23, Township 10 South, Range 33 East, NMPM, Lea 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 to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan application was submitted on July 27, 1981 and approved on July 31, 1985 with an expiration date of July 31, 1990. The discharge plan renewal application dated June 13, 2005 submitted pursuant to Section 3106 and 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 permit is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve Dynegy Midstream Services, L.P. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Dynegy Midstream Services, L.P. of its responsibility to comply with any other governmental authority's rules and regulations. Please be advised that all exposed pits, including lined pits and open top 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 requires that "when a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to Section 3107.C., the OCD Director shall be notified 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 approval is for a period of five years. **This approval will expire July 31, 2010** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, 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.

The discharge permit application is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge permit will be assessed a fee equal to the filing fee of $100 plus a renewal flat fee of $1700 for a Gas Compressor Station greater than 1001 horsepower.

Please make all checks payable to: **Water Quality Management Fund**
C/o: Oil Conservation Division
1220 S. Saint Francis
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail wayne.price@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
Dynegy Midstream Services, L.P., Vada Gas Compressor Station (GW-027)
DISCHARGE PERMIT APPROVAL CONDITIONS
September 29, 2005

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received. The $1700.00 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Commitments: The permit holder will abide by all commitments submitted in the discharge permit renewal application and these conditions for approval.

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

4. 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.

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

6. 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.

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

8. Below Grade Tanks/Sumps/Pits/Ponds: All below grade tanks, sumps, pits and ponds must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design, unless approved otherwise. All below grade tanks, sumps and pits must be tested annually or as specified herein, except systems that have secondary containment with leak detection. These systems with leak detection shall have a monthly inspection of the

leak detection to determine if the primary containment is leaking. Results of tests and inspections shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Any system found to be leaking shall be reported to OCD within 15 days. Permit holders 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Permit holders 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. Any system found to be leaking shall be reported to OCD within 15 days. The OCD will be notified at least 72 hours prior to all testing.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation 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.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203.

13. 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 permit will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water: Stormwater runoff plans and controls shall be maintained to prevent water contaminants, that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 or Toxic Pollutants as defined in 20 NMAC 6.2.7.VV from being discharged in any stormwater run-off.

16. Vadose Zone and Water Pollution: Any vadose zone or water pollution including future discoveries will be addressed through the discharge permit. Dynegy shall be responsible for reporting, investigating, remediating and/or abating all water contaminates. A permit modification may be required upon notification from OCD to prevent water pollution or abate contamination. Failure to properly report, investigate, remediate or abate vadose zone or groundwater contaminates will be considered a violation of the permit.

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

18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

19. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** 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.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

Clark White
Company Representative- print name

Clark White Date 10/4/05
Company Representative- Sign

Title V.P. & Region Manager

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 10/12/05

or cash received on _____ in the amount of $ 1700 00

from VERSADO GAS PROCESSORS

for VADA COMP ST GW-027

Submitted by: (Facility Name) WAYNE PRICE Date: (DP No.) 11/30/05

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2005

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. ■ CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877) 672-1449

BANK ONE, NA - 710
CHICAGO, IL
Payable Through First USA Bank, NA

62-28
311
0934623

PAY One Thousand Seven Hundred and NO/100 Dollars

CHECK NO [redacted]

CHECK DATE 10/ 12/ 05

PAY EXACTLY $******1,700.00
Void After 90 Days

TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

VICE PRESIDENT
AUTHORIZED SIGNATURE

GW-027

[redacted]

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

September 29, 2005

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan Renewal GW-027
Dynegy Midstream Services, L.P.
Vada Gas Compressor Station
Lea County, New Mexico

Dear Mr. Wrangham:

The groundwater discharge plan renewal application GW-027 for the Dynegy Midstream Services, L.P. Vada Gas Compressor Station located in of Section 23, Township 10 South, Range 33 East, NMPM, Lea 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 to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan application was submitted on July 27, 1981 and approved on July 31, 1985 with an expiration date of July 31, 1990. The discharge plan renewal application dated June 13, 2005 submitted pursuant to Section 3106 and 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 permit is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve Dynegy Midstream Services, L.P. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Dynegy Midstream Services, L.P. of its responsibility to comply with any other governmental authority's rules and regulations. Please be advised that all exposed pits, including lined pits and open top 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 requires that "when a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to Section 3107.C., the OCD Director shall be notified 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 approval is for a period of five years. **This approval will expire July 31, 2010** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, 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.

The discharge permit application is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge permit will be assessed a fee equal to the filing fee of $100 plus a renewal flat fee of $1700 for a Gas Compressor Station greater than 1001 horsepower.

Please make all checks payable to: **Water Quality Management Fund**
C/o: Oil Conservation Division
1220 S. Saint Francis
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail wayne.price@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
Dynegy Midstream Services, L.P., Vada Gas Compressor Station (GW-027)
DISCHARGE PERMIT APPROVAL CONDITIONS
September 29, 2005

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received. The $1700.00 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Commitments: The permit holder will abide by all commitments submitted in the discharge permit renewal application and these conditions for approval.

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

4. 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.

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

6. 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.

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

8. Below Grade Tanks/Sumps/Pits/Ponds: All below grade tanks, sumps, pits and ponds must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design, unless approved otherwise. All below grade tanks, sumps and pits must be tested annually or as specified herein, except systems that have secondary containment with leak detection. These systems with leak detection shall have a monthly inspection of the

leak detection to determine if the primary containment is leaking. Results of tests and inspections shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Any system found to be leaking shall be reported to OCD within 15 days. Permit holders 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for OCD inspection. Permit holders 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. Any system found to be leaking shall be reported to OCD within 15 days. The OCD will be notified at least 72 hours prior to all testing.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation 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.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203.

13. 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 permit will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water: Stormwater runoff plans and controls shall be maintained to prevent water contaminants, that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 or Toxic Pollutants as defined in 20 NMAC 6.2.7.VV from being discharged in any stormwater run-off.

16. Vadose Zone and Water Pollution: Any vadose zone or water pollution including future discoveries will be addressed through the discharge permit. Dynegy shall be responsible for reporting, investigating, remediating and/or abating all water contaminates. A permit modification may be required upon notification from OCD to prevent water pollution or abate contamination. Failure to properly report, investigate, remediate or abate vadose zone or groundwater contaminates will be considered a violation of the permit.

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

18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

19. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** 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.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

_____
Company Representative- print name

_____Date_____
Company Representative- Sign

Title_____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

October 2, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 4850

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan Renewal GW-027
Dynegy Midstream Services, L.P.
Vada Gas Plant
Lea County, New Mexico

Dear Mr. Wrangham:

The groundwater discharge plan renewal application GW-027 for the Dynegy Midstream Services, L.P. Vada Gas Plant located in of Section 23, Township 10 South, Range 33 East, NMPM, Lea 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 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 July 27, 1981 and approved on July 31, 1985 with an expiration date of July 31, 1990. The discharge plan renewal application dated February 03, 2000 submitted pursuant to Section 3106 and 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 Dynegy Midstream Services, L.P. of liability should operations result in pollution of surface or ground waters, or the environment. Please be advised that all exposed pits, including lined pits and open top 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 requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Dynegy Midstream Services, L.P. 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 approval is for a period of five years. **This approval will expire July 31, 2005** and an application for renewal should be submitted in ample time before that date. Pursuant to 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 plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Dynegy Midstream Services, L.P.., Vada Gas Compressor Plant is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $50 plus a renewal flat fee of $690.00 for natural gas compressor plants. The OCD has not received the $690.00 flat fee. The flat fee of $690.00 may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval and subsequent installments due on this date of each calendar year.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). 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
Environmental Bureau Chief
RCA/lwp
Attachment-1 2
xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-027 APPROVAL
Dynegy Midstream Services, L.P., Vada Gas Compressor Plant
DISCHARGE PLAN APPROVAL CONDITIONS
October 2, 2000

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 natural gas compressor plants. 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.

2. Commitments: Dynegy Midstream Services, L.P. will abide by all commitments submitted in the discharge plan renewal letter dated February 03, 2000, and these conditions for approval.

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

4. 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.

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

6. 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.

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

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2000 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 December 31, 2000.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2000 and every 5 years, 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 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 December 31, 2000.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation 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.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Hobbs District Office.

13. 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.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections. As a result of the inspection conducted by OCD on May 10, 2000 (copy enclosed) the following action items shall be addressed:

    A. Provide to OCD for approval a clean-up plan for the area located around the Waste Water Disposal Tanks (see photo #5).
    B. Provide to OCD a plan to install proper containment for the Plant Waste Water Storage Tanks (see photo # 5).
    C. Provide the most recent water analysis for the on-site plant water well.

    Please provide the above requested plans and information by December 31, 2000.

15. Storm Water Plan: Dynegy Midstream Services, L.P. will submit a stormwater run-off plan for OCD by December 31, 2000.

16. 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.

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

18. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** 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.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

_____
Company Representative- print name

_____ Date_____
Company Representative- Sign

Title_____

ACKNOWLEDGEMENT OF RECEIPT OF CHECX/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/20/05

or cash received on _____ in the amount of $ 300

from VERSADO GAS - AYRBGY

for VADA COMP / MONUMENT GAS PLANT / SAUNDERS GAS PLANT / GW-027 GW-025; GW-026
(Facility Name) (OCD No.)

Submitted by: WAYNE PRICE Date: 6/28/05

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTO

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877)672-1449

BANK ONE, NA - 710
CHICAGO, IL
Payable Through First USA Bank, NA

62-28/719
311
0984623

PAY Three Hundred and NO/100 Dollars

CHECK NO. [redacted]

CHECK DATE 06/20/05

PAY EXACTLY $*********300.00
Void After 90 Days

TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

VICE PRESIDENT
AUTHORIZED SIGNATURE

[redacted]

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO SEE THE MARK WHEN CHECKING THE ENDORSEMENTS.

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

July 5, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-735

Mr. Ken Stinson
Environmental Specialist
Warren Petroleum Company
P.O. Box 67
Monument, NM 88265

RE: **Discharge Plan Renewal GW-27**
Vada Gas Processing Plant
Lea County, New Mexico

Dear Mr. Stinson:

The discharge plan renewal GW-27 for the Warren Petroleum Company Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The renewal application consists of the original discharge plan as approved July 31, 1985, the renewal dated October 29, 1990, and the renewal application dated April 26, 1995.

The discharge plan renewal was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open 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 require "When a facility 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 on July 31, 2000, and you should submit an application for renewal six months before this date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Warren Petroleum Company Vada Gas Processing Plant is subject to 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 (50) dollars plus one-half of the flat fee, or sixteen-hundred sixty-seven dollars and fifty cents ($1667.50) for gas plants. The New Mexico Oil Conservation Division (OCD) has not received your filing fee or flat fee. The fifty (50) dollar filing fee is due upon receipt of this approval. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: NMED-Water **Quality Management** and addressed to the OCD Santa Fe Office.

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,

by Ron Marrett Deputy Rivelis

William J. LeMay
Director

WJL/mwa
Attachment

xc: Jerry Sexton, OCD Hobbs Office
Wayne Price, OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-27 RENEWAL
WARREN PETROLEUM COMPANY
VADA GAS PROCESSING PLANT
DISCHARGE PLAN REQUIREMENTS
(July 5, 1995)

1. Payment of Discharge Plan Fees: The fifty (50) dollar filing fee and the sixteen-hundred sixty-seven dollars and fifty cents ($1,667.50) flat fee shall be submitted upon receipt of this approval. The flat fee of sixteen-hundred sixty-seven dollars and fifty cents ($1667.50) may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

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

3. Sump Inspection: All pre-existing single-lined sumps at this facility will be cleaned and visually inspected on an annual basis. The inspection will coincide with the annual scheduled plant shutdown.

   Any new or rebuilt sumps or below-grade tanks will incorporate leak detection in their designs and will be approved by the OCD prior to installation.

4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.

5. Above Grade Tanks: All above ground tanks (saddle tanks) will be on impermeable pad and curb type containment.

6. Pressure Testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.

7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and Hobbs District Offices pursuant to WQCC Rule 1-203 and OCD Rule 116.

8. Pads: All compressor pads will have lips or curb type containment installed to prevent contaminants from running onto the ground surface.

   All containment areas must remain free of any sediments and/or fluids. Routine inspections will be made of all such areas and any sediments and/or fluids found will be removed and disposed of at an approved facility.

9. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.