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# REPORTS

DATE:

1992 PHASE I

DRAFT

**Brown McCarroll & Oaks  
Hartline**

Austin, Texas

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OIL CONSERVATION DIV.  
SANTA FE

**ENSR**

Phase I Preliminary  
Assessment of Exxon  
Chemical Company  
1715 Dal Paso Street  
Hobbs, New Mexico

**ENSR Consulting and Engineering**

**June 1992**

**Document Number 1009-001**

**PRIVILEGED AND CONFIDENTIAL DRAFT**



June 19, 1992

Mr. R. Keith Hopson  
Brown McCarroll & Oaks Hartline  
1400 Franklin Plaza  
111 Congress Avenue  
Austin, Texas 78701

**PRIVILEGED AND CONFIDENTIAL**

RE: Phase I Preliminary Assessment of Exxon Chemical Company 1715 Dal Paso, Hobbs,  
New Mexico

Dear Mr. Hopson:

ENSR Consulting and Engineering (ENSR) is pleased to transmit its preliminary assessment of the above-referenced property. ENSR was retained as a consulting expert for the sole purpose of assisting Brown McCarroll & Oaks Hartline (Brown McCarroll) and Exxon Corporation (Exxon) in preparing for anticipated litigation against NL Industries, Inc. (NL). To assist Brown McCarroll and Exxon in preparing their claims, ENSR performed environmental assessments at former NL facilities acquired by Exxon, including an assessment of potential on-site contamination, off-site contamination, and regulatory compliance issues.

This report describes the results of ENSR's initial investigation to identify the potential presence of hazardous waste, petroleum hydrocarbon contamination, or other waste related problems involving or affecting the subject property. Unless specified to the contrary, this Phase I evaluation does not include consideration of asbestos materials, urea formaldehyde, or radon gas. Such materials, if present, normally cannot be identified without the use of special instruments, specially trained personnel, or special testing procedures.

ENSR has performed this preliminary assessment in a professional manner using that degree of skill and care exercised for similar conditions by reputable and competent environmental consultants. Nonetheless, several major qualifications are inherent in the conduct of this or any other environmental assessment.

- The distinct possibility always exists that major sources of future environmental liability have yet to manifest themselves to the point where they are reasonably identifiable through an external investigation, such as was conducted in this case.
- We note that the results of our investigation represent the application of a variety of engineering and technical disciplines to material facts and conditions associated with the subject property. Many of the facts and conditions are subject to change over time; accordingly, the assessment report must be viewed within this context.



Mr. R. Keith Hopson

June 19, 1992

Page 2

- ENSR shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time the evaluation was performed.

ENSR's investigative activities took place between August 27 and September 6, 1991 and the on-site inspection was performed on August 27, 1991.

This report and all field data, notes, and laboratory test data (hereinafter collectively "information") were prepared by ENSR solely for the benefit of ENSR's clients, Brown McCarroll and Exxon. The purpose of this report is to assist Brown McCarroll and Exxon in preparing for anticipated litigation against NL. ENSR's clients may release this report to third parties, who may use and rely upon the report at their discretion. However, any use of or reliance upon this report by a party other than the clients shall be solely at the risk at such third party and without legal recourse against ENSR or its subsidiaries and affiliates, or their respective employees, officers or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent or other negligence and strict liability of ENSR), statutes or otherwise. This report shall not be used or relied upon by any party who does not agree to be bound by the above statement.

If you have any questions regarding our report or its findings, please do not hesitate to call me at (713) 520-9900.

Sincerely,

ENSR Consulting and Engineering

A handwritten signature in cursive script that reads "Jay L. Swindle, P.E." with a stylized flourish at the end.

Jay L. Swindle, P.E.  
Project Manager

JLS/al:1009R001.10

Attachments

**Brown McCarroll & Oaks Hartline**  
Austin, Texas

Phase I Preliminary Assessment of  
Exxon Chemical Company  
1715 Dal Paso Street  
Hobbs, New Mexico

**ENSR Consulting and Engineering**

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**CONTENTS**

	<u>Page</u>
<b>PART I: SITE OWNERSHIP AND LOCATION .....</b>	<b>1</b>
<b>PART II: DESCRIPTION AND CHARACTERIZATION OF THE SITE .....</b>	<b>3</b>
<b>PART III: SITE HISTORY AND DESCRIPTION OF SURROUNDING LAND USES .....</b>	<b>13</b>
<b>PART IV: INVENTORY OF SENSITIVE RECEPTORS IN SITE VICINITY .....</b>	<b>15</b>
<b>PART V: DESCRIPTION OF KNOWN OR SUSPECTED RELEASES OF HAZARDOUS MATERIALS OR PETROLEUM HYDROCARBONS .....</b>	<b>16</b>
<b>PART VI: SELECTED REGULATORY ISSUES .....</b>	<b>19</b>
<b>PART VII: REFERENCES .....</b>	<b>33</b>

**ATTACHMENT**

- A RADIATION SURVEY**
- B SPILL REPORT**

<u>Figures</u>	<u>Page</u>
<b>1 Property Location .....</b>	<b>2</b>
<b>2 Property Boundaries .....</b>	<b>4</b>
<b>3 Property Details .....</b>	<b>5</b>

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**PART I: SITE OWNERSHIP AND LOCATION****1. Site Owner:**

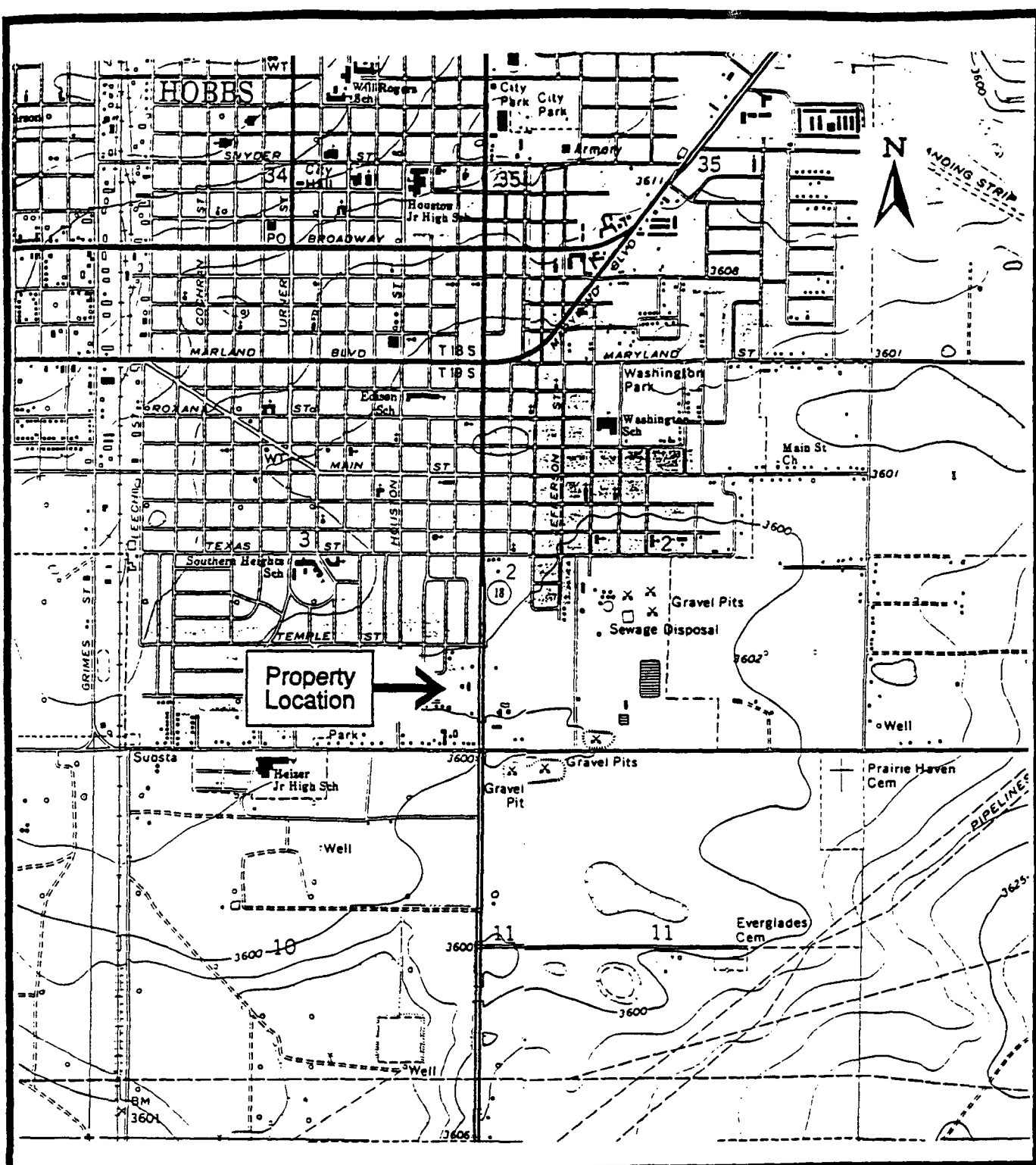
- (a) Name: Exxon Chemical Company
- (b) Address: 13501 Katy Freeway  
Houston, Texas 77079

**2. Site Operator:**

- (a) Name: Exxon Chemical Company
- (b) Address: 1715 Dal Paso,  
Hobbs, NM 88240

**3. Site Location References: (See Figure 1: Site Location Map)**

- (a) Address: 1715 Dal Paso,  
Hobbs, NM 88240
- (b) County: Lea County
- (c) U.S.G.S. Quad Map: Hobbs West, New Mexico (1969, photo revised 1979)



Source: USGS, Hobbs, West, N. Mex. quadrangle, 1969. Photo Revised 1979.



QUADRANGLE LOCATION

Scale

0

1 Mile

**ENSR**<sup>TM</sup>

Consulting and Engineering

Figure 1  
Property Location  
1715 Dal Paso  
Hobbs, NM

DRAWN: RBS

DATE: 9-5-91

PRJ. NO.: 2620-092-517



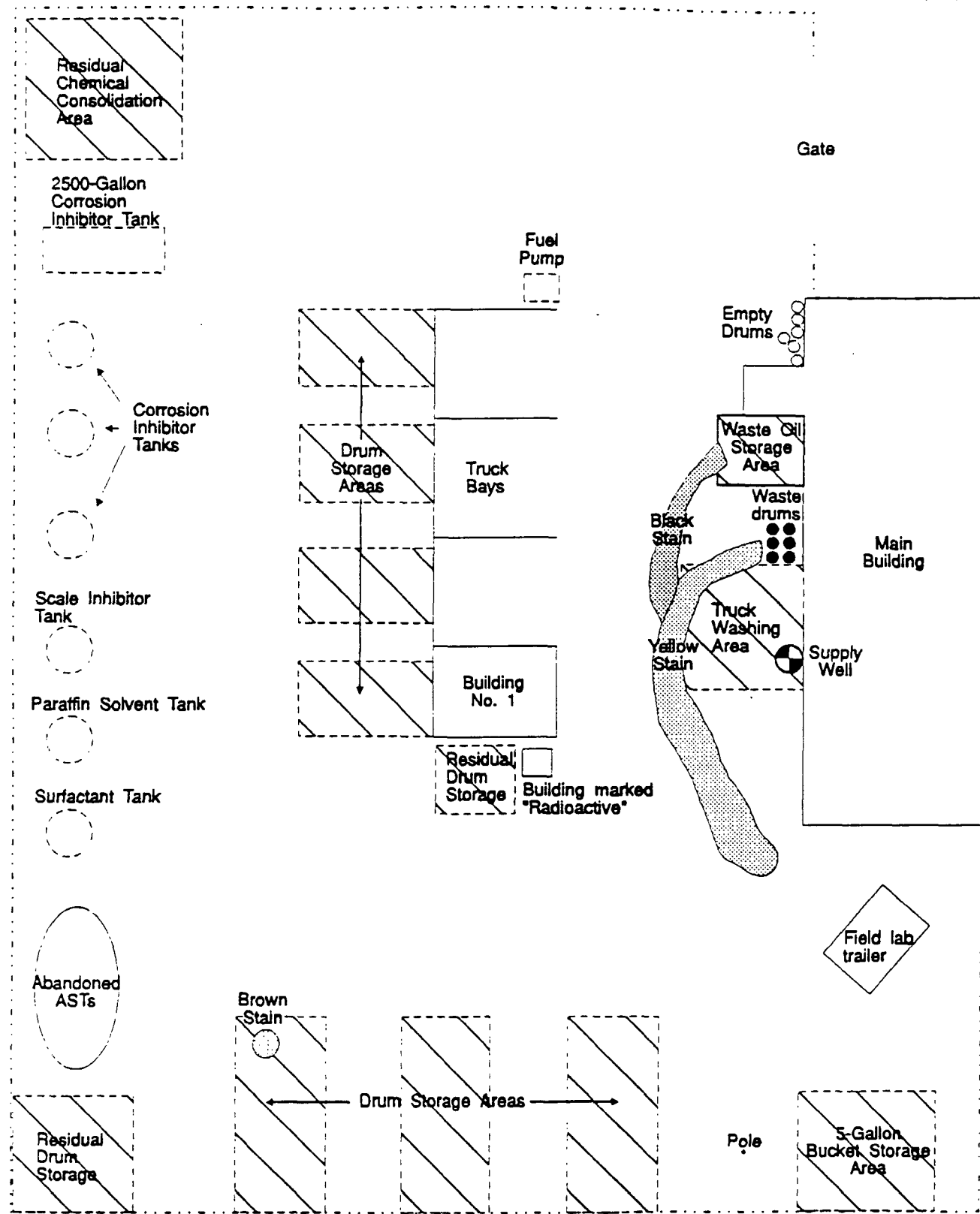
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**PART II: DESCRIPTION AND CHARACTERIZATION OF THE SITE****1. Physical Description of Site (See Figures 2 and 3, Property Boundaries and Property Details):**

- (a) **Site acreage:** Approximately 7 acres.
- (b) **Estimated % of site covered by buildings and pavement:** 20 percent.
- (c) **Site and building layout:** The subject property is divided into a fenced yard area within the property boundaries and a vacant field. The yard area encompasses several buildings and storage areas as well as pipe laydown areas and equipment as follows:
  - The Main Building (truck bay and office space) to the east;
  - Building No. 1 (garage bays and storage space) in the eastern half of the yard, but west of the Main Building;
  - Abandoned aboveground storage tank area along the west side of the yard;
  - Drum storage areas in the fenced yard area located along the west wall of Main Building, along south side of Building No. 1 and with a few drums located on the northwest and southwest corners of the fenced yard area.
  - An abandoned septic tank just north of the fence surrounding the yard area within the perimeter of the property; and
  - An exposed sump pit for washing trucks inside the Main Building.

The Main Building is a 4138-square-foot rectangular metal building which is currently vacant. NL Treating Chemicals Co. (NL) reportedly used the building for storage of office materials (boxes of documents were observed in one room). Occasionally, some dry chemicals products (sodium sulfide and caustic) were stored in the building. Oil staining was reported to have originated from previous truck washing operations from NL McCullough were visible in sump area.

Septic Tank (abandoned)



- Fence
- Existing structure
- - - Approximate location of structure
- /// Approximate area location

NOT TO SCALE

**ENSR** Consulting and Engineering

Figure 3  
Property Details  
1715 Dal Paso, Hobbs, New Mexico

DATE: 01

ISSUE: 07/01

PLN. NO.: 2420-077-517

Building No. 1 is a 1953 square-foot rectangular metal building currently vacant. NL used the truck bays for overnight parking and used the storage room for tire storage, and occasionally for storing dry chemical products in 5-gallon buckets. 55-gallon drums of well treating chemicals were occasionally stored in this room.

Building No. 2 is a small concrete building (approximately 6 by 6 feet) painted yellow with a metal roof, and is currently not used. It was reported that isotopes were stored by NL McCullough (former owner) in this building until 1980. NL stored motor oil in this building. The building was painted yellow and had radioactive labeled placards attached to the exterior walls. The placards were painted over prior to 1985; however, the paint has faded since that time and the radioactive labels are visible. According to Mr. John Nogelemeier, Sales Engineer for Exxon Chemical Company (Exxon), the placards were visible after 1987, and never repainted.

- (d) **Topography and slope:** The subject property is located on a relatively flat surface with a less than 1 percent slope. A low spot was observed in the northwest and southeast corner of the fenced yard area. Caliche fill material in the yard area appears to be slightly elevated above the open field to the west.
- (e) **Depth to groundwater/flow direction:**\* Mr. Johnny Hernandez, Lea County Basin Supervisor in the New Mexico State Engineering Office stated that the depth to the water table in this area ranges between 40 and 60 feet. He reported that in this particular area, shallow groundwater flow direction is generally toward the southeast.
- (f) **Surface water and wet areas (including streams, rivers, ponds, etc.):** Surface water bodies were not observed on the property. According to USGS quadrangle maps, the nearest water body is a very small pond located approximately 1/2 mile south southeast of the subject site.
- (g) **Ditches/Drainage Features:** No drainage ditches were noted on or near the subject property at the time of the reconnaissance. The overall surface water runoff pattern appears to be to the west within the yard area. However, the yard area has been filled

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\* Unless otherwise noted, the groundwater flow direction has been inferred from a review of regional topographic data. Site specific conditions may vary due to a variety of factors, including geologic anomalies, utilities, nearby pumping wells (if present), and other developments.

and represents an unnatural elevation over the entire site. Review of topographical contours of the entire site indicate that the drainage is toward the southeast.

- (h) **Other:** The subject property has been flooded by approximately 1 foot of water at least twice within the last 10 years, according to Mr. John Nogelemeier and Mr. Charlie Dye, both of Exxon.

**2. Brief Description of Current Use in Terms of Products Made; Processes Used; Raw Materials Employed; Chemicals and Fuels Used; and Wastes Generated, Including Waste Disposal Facilities/Locations Used:**

The property is currently used only for administrative purposes by Exxon. In 1991 Exxon established a trailer office on the east side of the property, adjacent to Dal Paso, and outside of the yard area. Exxon currently does not store chemicals at the subject property.

Although the subject property is currently vacant, except for the Exxon office trailer, the facility was formerly used by NL for a chemical storage yard. Chemicals, used for the maintenance of oil wells, included paraffin solvents, corrosion inhibitors, scale inhibitors, emulsion breakers (demulsifiers), desalting compounds, microbicides, surfactants, defoamers, water clarifiers, and several other miscellaneous chemicals.

Wastes generated during the former NL operations included solid waste, waste oil and oil filters from truck maintenance, and truck washing wastewater.

- Waste oil filters were transported to the Hobbs Landfill for disposal.
- Mr. Ken LaFavers and Mr. John Nogelmeier of Exxon reported that waste oil was consolidated in drums and reclaimed periodically by an independent contractor.
- Trucks were washed weekly with "Slick 5" (now called Corexit SL 578) mixed with diesel fuel and water. Wash water was dispersed to the ground surface.
- Chemical product residue returned in drums was consolidated (into drums) with other compatible materials and transferred to NL, Houston, Texas, via NL, Odessa, Texas. In addition, some residual common products were consolidated for reuse.

Although no wastes except domestic trash are currently generated on site, there are three 5-gallon buckets of waste oil and several 55-gallon drums of waste oil filters, rags and

cardboard along the west side of the main building generated from the previous truck maintenance activities conducted by NL periodically from 1969 to 1989.

**3. Selected Facility Information:**

- (a) **Septic tanks/leaching fields:** A concrete septic tank was located north of the fenced yard area. The tank was filled in with soil, and a cover was bolted on in 1984, when NL McCullough vacated the property, according to Mr. Robert Cudd, former NL District Manager. The top of the tank had a concrete surface with a steel cover as noted during the property reconnaissance on August 27, 1991.
- (b) **Sanitary sewers:** Mr. Larry Fulwider, former manager of NL/Exxon Chemicals Company, reported that the property was used only for storing chemicals between 1984 and 1989, and the sanitary facilities in the main building were not used. Only the main building has sanitary facilities. The septic tank was reportedly not utilized during this time period. No records of the tank being cleaned out or closed in place were available for review. According to Ms. Peggy Hopland, Assistant Office Manager of the Hobbs Water Department, records indicate the subject property was connected to the municipal sanitary sewer line in 1989. The sanitary sewer line to the subject property is located outside the north side of the yard.
- (c) **Process wastewater sewers:** According to Mr. Cudd, no blending or mixing operations were conducted at this facility during the NL and Exxon Chemical Co. occupancy of the subject property. However, truck washing operations and sanitary wastewater from the buildings were transferred to the septic tank outside the fenced area prior to 1984.
- (d) **Facility water supplies (potable and process):** The facility obtains its water supply from the municipal water supply. Ms. Peggy Hopland of Hobbs Water Department, reported that water service was available to the property from February 1984 through March 1989. Mr. Cudd reported that the facility connected to the city water service in 1982 when the on-site water well was no longer producing enough water for drinking water supply or wash water for the truck maintenance activities.
- (e) **Wells (active or abandoned monitoring, potable or process water supplies, injection, gas/oil):** Mr. Cudd stated that there is one well on the subject property near the main building. This well supplied potable water to the main building. Use of the well was discontinued in 1982 (by former owner NL McCullough) because it did not produce enough water for the facility's demand. The property was then hooked into the

city water service. Mr. Ira Kasky, a former NL employee, reported that the well is approximately 700 feet deep and was operational when NL McCullough left the property in 1984. No evidence of the well was visible during the site visit.

#### **4. Observations Concerning Waste Management Practices at Site**

(a) **Date of site/facility inspection:** August 27, 1991

(b) **Weather-related limitations:** None.

(c) **Access-related limitations:** None.

(d) **General condition of interior areas:**

(i) **Process areas:** None present.

(ii) **Raw material/chemical supply areas:** Dry chemicals were occasionally stored inside the Main Building and in Building No. 1, according to Mr. Cudd. Usually the materials included dry chemicals, such as sodium sulfide and caustic in 5-gallon buckets. Reportedly, drums (55-gallon) were rarely stored in buildings. No evidence of chemical spills was observed in the buildings during the property reconnaissance on August 27, 1991.

(iii) **Waste storage areas:** No hazardous or nonhazardous wastes were stored inside the buildings during the NL/Exxon operations.

(iv) **Floor drains, sumps:** No floor drains were noted in the buildings. Partial renovation of the main building made it difficult to determine whether any floor drains previously existed. According to Mr. Cudd, a concrete-lined sump in the main building collected wastewater from NL McCullough truck washing operations. The sump drained to the septic tank. The sump contained approximately 6 inches of tan sand. None of the facility's representatives knew why the sand was in the sump area. The sides of the sump appeared to be stained black.

(v) **Other:** The concrete floors of the truck bays (Building No. 1) were stained and crusted with dry chemical residues. Mr. Nogelmeier reported the crusted materials were probably chemicals such as sodium sulfide, caustic and other well treating chemicals which dripped from the NL trucks during truck washing operations.

(e) **General condition of exterior areas:**

- (i) **Process areas:** No processing, blending or mixing, was conducted at the subject property (only chemical storage and equipment washing was done in the past).
- (ii) **Waste storage areas:** Chemical residues were consolidated in the northwest and southwest corner within the fenced yard area of the property. Mr. Nogelmeier reported that their clients used only approximately 45 gallons of a 55-gallon drum of chemical at a time. Therefore, returned drums received at the site contained residual chemical. The remaining chemical was poured into a drum with other compatible materials. Mr. Nogelmeier reported that although unknown quantities of materials were lost during consolidation, no significant evidence of spillage was noted in the northwest corner from 1985 to 1989. Mr. Cudd reported that residual chemicals were also consolidated in the southwest corner of the yard (unbermed area) from at least 1977 to 1985. One brown stain 5 feet in diameter was observed in the southwest corner, with a possible source being water soluble corrosion inhibitor. No other significant stains were noted in this area. The new caliche layer covered the original surface over portions of the site and made distinguishing other potential stains difficult. In addition, piles of weeds, moved by flooding water, prevented a full view of the surface.

Waste oils from the NL trucks were stored in a corner west of the Main Building (see Figure 2). The concrete and soil in this area is heavily oil stained. Three 5-gallon buckets of liquid waste oil are currently still located in this area. Two were open and partially full and one bucket was closed but appeared to be full.

Nonhazardous solid waste such as trash from the trucks was often stored in a 55-gallon drums and periodically emptied at the City of Hobbs Lea County Landfill. Six of these 55-gallon drums containing this oily solid waste still remain along the west side of the Main Building adjacent to the waste oil storage area.

- (iii) **Loading/unloading docks:** No loading/unloading docks are located at the subject property.
- (iv) **Tank fill locations:** Aboveground storage tanks were formerly located in the middle of the western portion of the yard (Figure 3). Tanks were not placed inside of secondary containment for spill collection until 1986. According to Mr. Nogelmeier of Exxon, the area where the tanks may have been located was stained and crusted. However, because a large portion of this area was excavated and/or

covered with new caliche in 1986, the original stains or crusts were not visible or present during the site visit.

Mr. Ira Kasky, former NL employee, reported that an aboveground gasoline storage tank was located along the north side of Building No. 1 for NL McCullough's use. The tank was removed when NL McCullough moved off site in 1984. No surficial visual evidence of the former tank, including diking or stains, was observed during the property reconnaissance.

(v) **Catch basins:** No catch basins were noted during the property reconnaissance.

(vi) **Other:** Seven aboveground storage tanks were abandoned in the southwestern portion of the yard. These tanks were observed to be lying on their sides during the site visit. Four of the tanks were constructed of steel and three of fiberglass. One 360-gallon fiberglass tank contained approximately 4 inches (at the deepest point) of corrosion inhibitor (Coat 509). Another 180-gallon fiberglass tank contained approximately 4 inches (at the deepest point) of emulsion breaker sludge. The contents, if any, of the remaining tanks is unknown. No staining was observed on the ground during the site visit. Caliche had recently been placed in this area.

Two overpack drums each containing a 55-gallon drum were located in the northwestern corner of the yard. The drums felt empty and the overpack drums contained approximately 1 foot of water. No staining on the ground was noted in this area.

(f) **Other observations:**

(i) **Discolored soils:** Surface soil staining and crusting from dry chemical residue was observed in more than 20 areas throughout the yard area. Stains and crusts varied in size and shape. Three of the larger stained areas are:

- A black stain originating from the former waste oil storage area extends approximately 20 feet before joining a yellow stain, originating from six drums of oily refuse and other materials, to extend approximately another 30 feet. The staining disperses into the southeastern portion of the yard. Mr. LaFavers, currently of Exxon but a former NL employee, said that "chromates" were stored at the Dal Paso, Hobbs facility in 5-gallon buckets.



- A small (approximately 4-foot diameter) and lightly colored soil stain was observed in the area of former drum storage along the south side of the yard.
- A brown stain (approximately 5-foot diameter) was observed in the southwestern portion of the yard. Mr. Nogelmeier suspected the source to be water soluble corrosion inhibitor.

According to Mr. Nogelemeier, the former rectangular shaped 2500-gallon storage tank area, was crusted over with dry chemicals. After the original 2500-gallon tank was found to be leaking in the summer of 1986, contaminated soil was excavated and placed in a pile on site. After the soil was removed, a replacement 2500-gallon tank in a secondary containment basin was placed on top of what remained of the excavated soil. No reports addressed the soil removal or field procedures.

No stains or crusts were observed in the western portion of the subject property beyond the fenced yard area.

- (ii) **Discolored water:** Discolored water was not observed on the subject property.
- (iii) **Unusual odors:** Chemical odors were detected during the site visit. These odors were noted near the abandoned aboveground storage tanks in the southwestern portion of the yard. At least two of the tanks contained residues of chemicals (corrosion inhibitor and emulsion breaker sludge). All aboveground storage tanks are vented to the atmosphere.
- (iv) **Unusual vegetative conditions:** No unusual vegetative conditions were detected during the site visit.
- (v) **Other observations:** The subject property appears to be in an area that is influenced by heavy rainfall because it has been flooded at least twice within the last 10 years. The Flood Insurance Rate Map for the Hobbs area did not include the subject property which indicates the site is not in the 100-year floodplain. However, Mr. Fulwider of Exxon indicates drainage pattern in this area was recently modified in 1989 by the City and no longer floods.

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**PART III: SITE HISTORY AND DESCRIPTION OF  
SURROUNDING LAND USES**

**1. Description of Former Uses of Site, Including Dates Where Known, and Other Relevant Information Concerning Waste Generation, Disposal, and Underground Tanks:**

The site is currently occupied by Exxon, who purchased the property in 1987 from NL. NL operated on this site from 1969 to 1987. The NL operation involved chemical distribution, storage and truck maintenance from 1969-1984. In 1984 NL moved storage operations off site, but these operations were again begun on site in 1985. Mr. Cudd, former District Manager for the Hobbs, NM area, reported that NL shared the yard with NL McCullough from 1969 to 1984. He said that NL McCullough, an oil well (logging) service company, had owned and occupied the property since the 1940s.

The site could not be identified during a review of aerial photographs taken on February 7, 1949, October 10, 1959, and June 3, 1983. Photographs were taken at too high an altitude to observe surface details.

No underground storage tanks (USTs) are known to be on the property. Mr. Cudd also recalled that a fuel pump with an aboveground storage tank was located near the northeast corner of Building No. 1. Mr. Ira Kasky, former NL McCullough employee, reported that NL McCullough maintained a gasoline aboveground storage tank and fuel pump at the northeast corner of Building No. 1. He added that NL McCullough never had any underground storage tanks at the subject property.

NL McCullough, an oil well servicing company, stored radioactive (gamma) logging sources in Building No. 2 until 1980. NL McCullough checked the building and the fence line for ambient radioactivity on October 21, 1987. According to results, all readings were at normal background levels (less than 0.04 mR/hr). Attachment A provides documentation regarding this survey.

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**2. Description of Current and Former Uses of Properties Abutting or Adjacent to the Site, Including Relevant Information Concerning Potential Waste Generation and Underground Tanks:**

The subject site is bordered:

- on the south by Hobbs Wrecking Company;
- on the north by residences;
- on the east by Atlas Wireline Services, Liberty Pump Supply Co., and Industrial Salvage Co.; and
- on the west by an Amoco oil well location.

Aerial photos did not provide sufficient surficial detail to determine former uses of adjacent properties.

**3. Description of Other Potentially Significant Land Uses Currently Situated Within a Minimum of 250 Feet of Site:**

No other significant land uses were noted within 250 feet of the subject site.

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**PART IV: INVENTORY OF SENSITIVE RECEPTORS IN SITE VICINITY****1. Wells/Potable Drinking Water Supplies Within a Minimum of 1,000 Feet:**

Approximately 27 water supply wells are located within a 1,000-foot radius, according to Mr. Johnny Hernandez, New Mexico State Engineer.

**2. Residences Within a Minimum of 1,000 Feet:**

Residential areas are located adjacent to the northern boundary of the subject property.

**3. Significant Wet Areas/Surface Water Bodies Within a Minimum of 1,000 Feet:**

No significant wet areas or surface water bodies were observed.

**4. Other Sensitive, Off-Site Receptors Within a Minimum of 1,000 Feet:**

No churches, hospitals, schools, or other sensitive receptors are located within 1,000 feet of the subject property.

**PART V: DESCRIPTION OF KNOWN OR SUSPECTED RELEASES OF  
HAZARDOUS MATERIALS OR PETROLEUM HYDROCARBONS**

**1. Has the Subject Site Ever Been Listed on Any of the Following:**

	<u>Yes</u>	<u>No</u>
(a) National Priorities List (Superfund)	___	<u>X</u>
(b) CERCLIS Data Base (of Potential Problem Site)	___	<u>X</u>
(c) State List/Inventory of Problem Sites	___	<u>X</u>

If "Yes", describe the listing, including lead agency, reason for listing, and current status of the case:

The site is not listed on the NPL or CERCLIS databases. In addition, New Mexico Environment Department, Hobbs, NM office did not have any files indicating NL or Exxon had been listed on local databases.

**2. If the Facility or Site Has Not Been Listed in (1) Above, Has the Facility Ever Had a Release, Spill, or Leak of a Hazardous Substance or Petroleum Hydrocarbons or Has the Facility/Site Ever Been Investigated by a Governmental Agency for the Actual or Potential Presence of an On-Site Contamination Problem? If so, Describe the Circumstances Surrounding the Incident (Date, Source, Location), Including Any Notification Submitted or Received, the Agency Response and Current Status of the Matter:**

A report (Attachment B) of an alleged chemical spill at the subject property was found in the New Mexico Environment Department, Hobbs office, hazardous waste files. The report indicates a spill occurred at 1600 Dal Paso. Mr. Larry Fulwider, former District Manager, said that this was not a spill, but an odor from residues in drums found floating in water which occurred at 1715 Dal Paso facility. A Hobbs police report indicates that several empty drums were floating in the NL yard on July 7, 1988 after a locally heavy rainfall event. One officer noted a chemical odor said to be the result of chemical residues washed out of the

drums. According to Ms. Myra Meyers, New Mexico Environment Department, personnel later investigated the site on an unspecified date and "found no problem."

One 2500-gallon aboveground storage tank containing corrosion inhibitor was found to be leaking in summer 1986, according to Mr. Nogelmeier and Mr. Cudd. Mr. Nogelmeier reported that a backhoe excavated a hole approximately 100 feet by 50 feet by 3 feet. He estimated that 400 to 500 cubic yards of soil were removed and piled just north of the excavation. The hole was filled with red dirt and topped with caliche. Mr. Bruce Johnson, former NL Manager of Materials Management, reported that he had photographs of the excavation, but did not know where they were. Mr. Johnson said that contaminated soil was loaded into 7-cubic yard dump trucks. The trucks were driven to NL, Odessa, Texas, where more soil was added for disposal. All of the soil was reportedly ultimately disposed of at a facility in Robstown, Texas. Mr. Johnson added that the excavation (which he believed to be 25 to 30 feet long, 5 feet wide, and 3.5 feet deep) was filled with a mixture of loam and clay, and topped with caliche. No analytical results were available for review.

Other releases from the following activities or incidents were also mentioned by Mr. Nogelmeier and Mr. LaFavers:

- routine tank filling operations;
- residue consolidation activities;
- drums falling off fork lifts (approximately 2 to 3 per year, 1986-1989);
- leaking truck hoses;
- corrosive materials corroding drums; and
- build up of excess vapor pressure blowing off top of drum (at least once, 1986-1989).

Lieutenant John Michael Casey, Hobbs Fire Department, reported that no incidents (fires, explosions, spills) were found in their files for 1715 Dal Paso, Hobbs from 1971 to the present.

3. Are There Any Sites Located Within a Minimum of 1,000 Feet of the Subject Site that are Shown on Either the National Priorities List of Federally-Designated/Proposed Superfund Sites, the U.S. EPA's CERCLIS Data Base List of Potential Problem Sites, or Any Comparable State List: for Each Identified Site, Describe Source of Listing, Approximate Distance and Direction Relative to Subject Site, and Whether or Not the Listed Site Appears to be in an Upgradient, Downgradient, or Parallel Hydrogeological Gradient Relative to the Subject Property:

ENSR's review of the CERCLIS list (November 1990) did not identify any facilities within 1,000 feet of the subject site with documented problems or contamination.

**PART VI: SELECTED REGULATORY ISSUES**

**1. Solid and Hazardous Waste**

- (a) **Identify and describe principal wastes generated, including estimated annual quantities by waste type:** Only office waste is currently generated at this facility. Previous wastes are residual chemicals from the transfer of products and waste oil from vehicle maintenance operations.

Hazardous Wastes		Non-Hazardous Wastes	
Waste Type	Annual Vol.	Waste Type	Annual Vol.
residual chemicals	unknown	waste oil	approximately 280 gallons
		domestic waste	unknown

- (b) **Identify RCRA Status of Facility:** The site is currently used only for administrative purposes. Exxon does not claim generator status at this facility.

- (c) **What is the maximum quantity of hazardous waste the facility generates on a monthly basis?**

None currently; volume from past operations is unknown.

- (d) **What is the maximum quantity of hazardous waste the facility accumulates on-site at any one time?**

None currently. Volume from past operations is unknown.

- (e) **What is the maximum period of time the hazardous waste remains on-site (prior to on-site treatment, storage or disposal; or shipment off-site for treatment, storage or disposal)?**

Currently no hazardous waste is stored on site. Some residual chemicals were stored by NL from 1969 to 1989. These chemicals were stored in 55-gallon drums until full and



then were taken off site for recycling at the Odessa, Texas facility. The time period that these wastes were stored on site is not known by former NL employees. The period of time these residual chemicals were stored on site is unknown. No records were kept concerning waste chemicals. Details of past operations by NL McCullough (1940 to 1984) are not known.

**(f) Describe the condition(s) of the hazardous waste storage area(s).**

Residual chemicals, reportedly the only hazardous wastes stored on site, were stored in 55-gallon drums south of Building No. 1 and also in the north and southwest corners of the fenced yard area.

**(g) If the facility is a TSDF, describe each unit and its permit status below.**

The site is not a TSDF facility.

**(h) Has the facility ever held RCRA interim status, submitted a RCRA Part B permit application, or received a RCRA Part B permit at any time?**

☐ Yes ☒ No

**(i) Has the EPA imposed any RCRA Corrective Action requirements on the facility as part of either a Part B permit or an enforcement action?**

☐ Yes ☒ No

**(j) Have there been any governmental RCRA-related inspections or investigations during the past five years?**

☐ Yes ☒ No

**(k) Have there been any RCRA notices of violation or enforcement actions taken against the subject facility?**

☐ Yes ☒ No

- (l) What is done with waste generated (including solid wastes, recycled materials, and hazardous waste) relative to disposal? (check below)

☐ On-site recycling/disposal

☒ Off-site recycling/disposal

If off-site disposal, identify below disposal locations (name, city, state) by waste type and approximate years during which disposal location(s) used.

Waste Type	Disposal Facility (Name, City, State)	Estimated Period of Usage
Solid waste	Hobbs City Landfill, Hobbs, NM	1969 to present
Waste oil filters	Hobbs City Landfill, Hobbs, NM	1969 to 1989
Waste oil	Various oil reclaimers	unknown to 1989
Liquid hazardous waste chemicals	NL, Houston, TX NL, Exxon (Sale in 1989) Odessa, TX	1969 to 1989

Manifest documents for transport of wastes from previous operations were not available for review.

- (m) Has the facility or facility owner(s) ever been identified as a potentially responsible party (PRP) at any site?

☒ Yes ☐ No

However, not in association with this facility.

## 2. Above and Underground Storage Tanks

- (a) Are there any active or inactive (but not abandoned) above or underground storage tanks present on the subject site?

Above Ground

Underground

☒ Yes ☐ No

☐ Yes ☒ No

If "Yes", describe all above and underground storage tanks, including contents, capacity (gals), year installed, construction material, secondary containment, cathodic protection or leak detection devices installed, tank tightness test results. See Table 1.

- (b) Are there any known underground tanks that have been abandoned in-place or removed?

☐ Yes ☒ No

- (c) Are there any storage tanks (hydrocarbon, mineral oil, or vegetable oil) with a capacity of (i) 42,000 gallons or more of underground storage; or (ii) 1,320 gallons or more aggregate of above ground storage, with any single container having a capacity in excess of 660 gallons?

☒ Yes ☐ No

If "Yes", does the facility have a spill prevention control and countermeasure (SPCC) plan that reasonably reflects current conditions and that has been certified by a registered engineer within the past 3 years?

☐ Yes ☒ No

Tanks have been abandoned in the yard and are not used; however, at least two fiberglass tanks contained small quantities of residual chemicals.

- (d) Do any of the underground tank (USTs) require registration under federal or comparable state UST regulation?

☐ Yes ☐ No

No USTs are present.

- (e) Are there any USTs subject to federal or comparable state UST regulations that were installed before December 1988?

☐ Yes ☒ No

**TABLE 1**
**INVENTORY OF ABOVE AND UNDERGROUND STORAGE TANKS**

Tank Identification No. (e.g. 1,2,3...)	750-gallon ASTs	2500-gallon AST
<b>1. Status of Tank (Mark all that apply with an X)</b>		
Aboveground Tank	X	X
Underground Tank		
Currently in Use		
Temporarily Out of Use		
<b>2. Estimated Age (Years)</b>	unknown	unknown
<b>3. Estimated Total Capacity (Gallons)</b>	750	2500
<b>4. Material of Construction (Mark all that apply)</b>		
Steel	X	X
Concrete		
Fiberglass Reinforced Plastic	X	
Unknown		
Other (See Comments)	X	
<b>5. Internal Protection (Mark all that apply)</b>		
Cathodic Protection		
Interior Lining (e.g. epoxy resins)		
None	X	X
Unknown		
Other (See Comments)		

TABLE 1

INVENTORY OF ABOVE AND UNDERGROUND STORAGE TANKS

Tank Identification No. (e.g. 1,2,3...)	750-gallon ASTs	2500-gallon AST
<b>6. External Protection (Mark all that apply)</b>		
Cathodic Protection		
Painted (e.g. epoxy resins)		
Fiberglass Reinforced Plastic Coated		
None	X	X
Unknown		
Other (See Comments)		
<b>7. Piping (Mark all that apply)</b>		
Bare Steel		
Galvanized Steel		
Fiberglass Reinforced Plastic		
Cathodically Protected		
Unknown		
Other (See Comments)	none	none
<b>8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply)</b>		
a. Empty		

**TABLE 1**

**INVENTORY OF ABOVE AND UNDERGROUND STORAGE TANKS**

Tank Identification No. (e.g. 1,2,3...)	750-gallon ASTs	2500-gallon AST
<b>b. Petroleum</b>		
Diesel		
Kerosene		
Gasoline (including alcohol blends)		
Used Oil		
Other (See Comments)	X	
<b>c. Hazardous Substance</b>		
Indicate Name of Substance		corrosion inhibitor
<b>9. Leak Detection Method (Mark all that apply)</b>		
a. Aboveground Tank (none required)	X	X
b. Underground Tank		
Annual Tank Tightness & Monthly Inventory Control		
Monthly Detection Monitoring (Indicate Method)		
Unknown		
None		
Other (See Comments)		

TABLE 1

INVENTORY OF ABOVE AND UNDERGROUND STORAGE TANKS

Tank Identification No. (e.g. 1,2,3...)	750-gallon ASTs	2500-gallon AST
10. Spill/Overfill Protection (Mark all that apply)		
a. Aboveground Tank (none required)	X	X
b. Underground Tank		
Spill Prevention		
Overfill Prevention		
Unknown		
None		

**Comments:** Fiberglass spill containment basins were installed in 1986 under all ASTs. A dirt berm was constructed along the western fence after installing the containment basins in 1986. 750-Gallon ASTs varied in construction - some were fiberglass, some were steel.

**3. Wastewater Discharges**

- (a) Identify and describe wastewater streams from subject facility, including effluent type (sanitary, process, storm), estimated volumes (gallons per day), and discharge point (receiving stream, sewage system, septic field, etc.).

Current wastewater discharge from the facility is limited to sanitary wastes from the office trailer. Sanitary wastes from the main building were discharged to the septic tank between 1969 to 1984. The main building was not used after 1984.

Approximately 500 gallons of water were used each week for truck washing between 1969 and 1984 inside main building. Trucks were washed with a mixture of "Slick 5," a degreasing agent, and water. The wash water was discharged to the septic tank.

NL used the sanitary facilities at the site during the NL McCullough occupation of the property (until 1984). Mr. Nogelmeier and Mr. LaFavers did not recall having access to toilet facilities after 1984. The city sewer line was not connected until 1989.

- (b) Describe the pre-treatment of wastewater streams, if any. According to Mr. Nogelemeier, no pretreatment provided.
- (c) Describe whether or not the facility has received the necessary permits for each discharge point. For each permit, identify the name of issuing agency, date permit granted, expiration/renewal date, and key permit limitations/requirements: Permits for sanitary wastewater disposed into the municipal use not required.

- (d) Have there been any governmental wastewater-related inspections or investigations during the past five years?

☐ Yes ☒ No

None, according to Mr. Nogelmeier, Mr. LaFavers, and Mr. Cudd.

- (e) Have there been any wastewater-related notices of violations or enforcement actions taken against the facility?

☐ Yes ☒ No

None, according to Mr. Nogelemeier, Mr. LaFavers, and Mr. Cudd.



**4. Storm Water**

(a) Is the facility subject to NPDES storm water regulations?

  X   Yes             No

The facility has waste storage areas without containment, although they are not currently used.

If "Yes",

(i) Has the facility applied for and/or received a NPDES permit that covers their storm water discharges?

Received:        Yes   X   No

Applied        Yes   X   No  
Only:

(b) Have there been any governmental storm water related inspections or investigations during the past five years?

       Yes        X   No

(c) Have there been any storm water related notices of violation or enforcement actions taken against the facility?

       Yes        X   No

**5. Air Quality**

- (a) What is the attainment/non-attainment status for the air quality control region within which the facility is located relative to each of the designated criteria pollutants?

Criteria Pollutant	Attainment	Non-Attainment
Sulfur Dioxide	X	
Particulates		X (dust storms)
Carbon Monoxide	X	
Nitrogen Dioxide	X	
Ozone	X	
Lead	X	

- (b) Describe significant point emission sources, including when each source was installed or modified (year). No significant point emission sources are currently located on the subject property. When the facility operated as an active chemical storage yard, fumes vented from storage tanks may have been considered a "significant" source. However, these tanks were never inspected by New Mexico Environmental Department for air emissions.
- (c) Describe whether or not the facility has received the necessary permits for each identified emission source (includes emission registrations where required). Identify any major permit limitations/requirements and identify any permits/registration that have lapsed and require renewal. The facility is not known to have obtained permits.
- (d) Have there been any governmental air quality-related inspections or investigations during the past five years?

☐ Yes      ☒ No.

According to Mr. Nogelemeier.

- (e) Have there been any air quality-related notices or violation of enforcement actions taken against the facility?

☐ Yes ☒ No.

According to Mr. Nogelemeier.

**6. SARA Title III**

- (a) Is the facility required to prepare, or have available, material safety data sheets (MSDS) for any hazardous chemical under OSHA?

☐ Yes ☒ No

No chemicals are currently stored on site.

MSDS were reportedly made available to NL employees.

If "Yes", is the hazardous chemical present at the facility in quantities at or above the specified reporting threshold?

☐ Yes ☒ No

If "Yes" relative to threshold quantities, has the facility:

- (i) Submitted an MSDS for each hazardous chemical, or a list of hazardous chemicals, to the local emergency planning committee, the state emergency response commission, and the local fire department?

☒ Yes ☐ No

MSDS were provided to the Hobbs Fire Department by Mr. LaFavers.

- (ii) Annually submitted a Tier I (Tier II if required by the state) emergency and hazardous chemical inventory form to the local emergency planning committee, the state emergency response commission, and the local fire department?

Not applicable for current operations.

(b) Determine the following:

Yes

No

- (i) Does the facility appear in any of the following standard industrial classifications, 20-39?

Not known

Contacts did not know the SIC code.

- (ii) Does the facility have 10 or more employees?

—

X

- (iii) Does the facility manufacture or process a listed SARA toxic chemical above the applicable threshold?

—

X

- (iv) Does the facility otherwise use a listed SARA toxic chemical above 10,000 lb/yr?

—

X

- (c) Has the facility had a release or releases of a CERCLA hazardous substance or a designated extremely hazardous substance since 1987 above reportable quantities which resulted in exposure to persons beyond the boundary of the subject property?

— Yes

X No

7. PCB Containing Items/Equipment

- (a) List major PCB items (transformers, capacitors, heat transfer equipment, hydraulic equipment, etc.) and check concentration category of each item if known: No PCB-containing equipment is believed to be or have been located on subject property, according to Mr. LaFavers, Mr. Nogelmeier, and Mr. Cudd.

**8. Other Regulatory or Related Matters**

**(a) Has an asbestos survey ever been conducted at the facility?**

☐ Yes ☒ No

No asbestos surveys have been conducted at the subject property, according to Mr. Cudd, Mr. LaFavers, and Mr. Nogelmeier.

**(b) Has there ever been a prior environmental audit or due diligence evaluation performed at the subject site/facility?**

☒ Yes ☐ No

Pilko & Associates conducted a site assessment in January, 1988.

**(c) Has there ever been any prior monitoring or testing of site or facility air emissions, surface or groundwater, or soils (surface or subsurface)?**

☒ Yes ☐ No

If "Yes", summarize key findings: Identify who or what firm performed the work, identify when study performed, and describe reason for study: NL McCullough, an oil well servicing company, stored radioactive (gamma) logging sources in Building No. 2 until 1980. NL McCullough checked the building and the fence line for ambient radioactivity on October 21, 1987. All readings were at normal background levels (less than 0.04 mR/hr). Attachment A provides documentation regarding this survey.

**(d) Are there any active, pending, or potential legal suits being brought against the subject facility for alleged environmental health or safety problems by past or present employees, neighbors, or other parties and not previously discussed?**

☐ Yes ☒ No

No legal suits are active, pending or potential, according to Mr. Dye, Mr. LaFavers, and Mr. Nogelmeier.

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**PART VII: REFERENCES****1. Persons Performing the Site Investigation (name, title, responsibility):**

Diane Lazarus, Staff Environmental Scientist, ENSR, St. Louis Park, MN (612-924-0117).  
Property reconnaissance, background research, and report preparation.

Jan Culbertson, Staff Wetlands Biologist, ENSR, Houston, TX, (713) 520-9900. Background  
research, and report preparation.

**2. Persons Interviewed (name, title, address, phone number):**

John Nogelmeier, Sales Engineer  
Exxon Chemical Company  
1715 Dal Paso, Hobbs, NM  
(505) 392-1518  
(Started working for NL Treating as a driver in 1985.)

Ken LaFavers, District Operations Supervisor  
Exxon Chemical Company  
1715 Dal Paso, Hobbs, NM  
(505) 392-1518  
(Started working for NL Treating in 1980.)

Charles Dye, District Manager  
Exxon Chemical Company  
1500 North Main  
Andrews, TX 79714  
(915) 524-4154

Lt. John Michael Casey, Inspector  
City of Hobbs Fire Department  
301 East White  
Hobbs, NM 88240  
(505) 397-5250

Myra Meyers, Supervisor  
New Mexico Environment Department  
2120 North Alto  
Hobbs, NM 88240  
(505) 397-5250

Robert Cudd, Western Regional Manager  
Exxon Chemical Co.  
P.O. Box 1600  
Midland, TX 79702  
(915) 699-3415  
(NL Treating Chemical Co. District Manager at Hobbs, New Mexico, 1977 - 1985)

Larry Fulwider (former Manager of NL Treating/Exxon Chemical Co. 1985-1989)  
P.O. Box 1600  
Midland, Texas 79702  
(915) 699-3415

Ira Kasky  
Atlas Wireline  
Eunice Hwy  
Hobbs, NM  
(505) 393-4181  
(NL McCullough employee, 1960 through 1984)

Johnny Hernandez, Lea County Basin Supervisor  
New Mexico State Engineering Office  
1900 West 2nd Street  
Roswell, NM 88201  
(505) 622-6521

Bruce Johnson, Staff Transportation Specialist  
Exxon Chemical Americas  
13501 Katy Freeway  
Houston, TX 77079  
(713) 870-6000  
(Manager of Materials Management for NL Treating in 1986)

Robert Cameron, Engineering Specialist  
Texas Air Quality Control Board  
(512) 451-5711

Paul Reed, Environmental Coordinator, Exxon Chemical Co.  
8230 Stedman  
Houston, TX 77029  
(713) 671-8676

Gary Spicer, National Manager for Oil Field Sales  
Exxon Chemical Co.  
Houston, TX  
(713) 460-6815

### **3. Reports and Documents Reviewed:\*\***

Memorandum from Roelf Ruffner, Environmentalist Supervisor, New Mexico Health and Environment Department, Hobbs Field Office, to File, July 11, 1988. Subject: Hazardous Materials Spill in Hobbs. With Attachment, General Case Report. (Attachment A)

City of Hobbs Environmental Services, Warning No. 21027, June 10, 1987.

Application for Building Permit for remodeling, June 20, 1984.

Commercial Appraisal Report for Exxon Company, U.S.A., for property located at 1715 South Dal Paso, Hobbs, Lea County, NM. May 9, 1989.

Aerial photographs: February 7, 1949 (DHO-2F-78); October 18, 1954 (DHO-A-2A-113); June 3, 1983 (363-173).

Flood Insurance Rate Map, City of Hobbs, NM, Panel 15 of 15 (350029 0015 B), July 16, 1991.

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\*\* We have examined and relied upon the reports and documents listed above which are based on the professional expertise or knowledge of the authors thereof. We have not conducted an independent examination of facts contained in these reference materials and have assumed that the information set forth therein is true and accurate.



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Calibration Certificate, Tracer Laboratory of Midland, Midland, Texas. July 14, 1987.

Site plan and meter readings by Steve McCollum, NL McCullough. October 21, 1987.

CERCLIS Database, November 1990.

PRP Database, May 1990.

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**SIGNATURES AND QUALITY CONTROL REVIEW**

**BY:** Diane J. Lazarus

**DATE:** 9/5/91

**TITLE:** Staff Environmental Scientist

**QUALITY CONTROL REVIEW BY:** C. L. Overton

**TITLE:** Program Manager

**DATE:** 9/10/91

**ATTACHMENT A**  
**RADIATION SURVEY**

## **ATTACHMENT A**

### **Documentation of Radioactivity Check:**

- **Calibration Certificate, Tracer Laboratory of Midland, July 14, 1987**
- **Site plan and meter readings by Steve McCollum, District Manager, NL McCullough, October 21, 1987**



# TRACER LABORATORY of Midland

P. O. Box 1773 • (915) 694-5751  
5600 W. Industrial • Midland, Texas 79701

## Calibration Certificate

INSTRUMENT OWNER:

Mr. M. C. Cullough  
Hobbs, N.M.

This is to certify that your survey meter, Type VICTOREEN,  
Model 493, Serial Number 2343 has been [ ] repaired  
and / or ☒ calibrated as of 2-14-87. Next calibration 1-14-88.

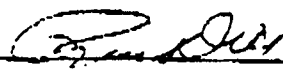
### CALIBRATION AND CERTIFICATION

#### CALIBRATOR OUTPUT

POS 1	<u>.25</u> mr/hr	<u>.25</u> mr/hr	POS 5	<u>5.8</u> mr/hr	<u>6.0</u> mr/hr
POS 2	<u>2.9</u> mr/hr	<u>3.0</u> mr/hr	POS 6	<u>9</u> mr/hr	<u>10</u> mr/hr
Pos 3	<u>4.0</u> mr/hr	<u>4.0</u> mr/hr	POS 7	<u>16</u> mr/hr	<u>16</u> mr/hr
POS 4	<u>4.8</u> mr/hr	<u>5.0</u> mr/hr	POS 8	<u>36</u> mr/hr	<u>36</u> mr/hr

Calibration Source Used: 125 mCi Cs-137 Traceable to NBS.

Thank You,

  
Tracer Laboratory of Midland, Inc.

NOTE: NO YR MATERIAL STORED AT  
THIS LOCATION SINCE 1980.

R/A  
SURVEY 10-21-89  
@ 9:20 AM MST

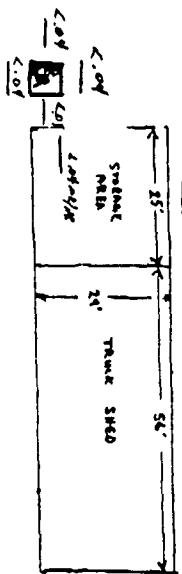
ALL READINGS ARE AT  
NORMAL BACKGROUND LEVELS.  
ALL READINGS WERE  
LESS THAN .04 MR/HOUR

SURVEY METER WAS  
CHECKED PRIOR TO SURVEY.  
SURVEY METER # 2343  
WAS USED.

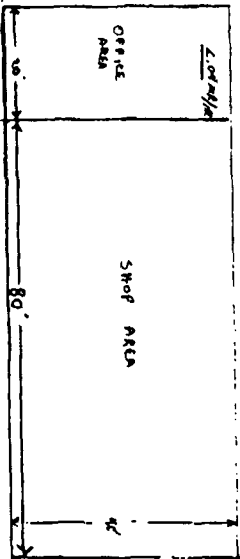
CALIBRATION CERTIFICATE IS  
ATTACHED.

*Steven F. McCallum*  
DIST MGR NLMC - HARRIS

SURVEY TAKEN BY  
STEVE McCallum  
DIST. MGR.  
(PAUL HOSICK)  
SR. ENGINEER



1.04 MR/H



FRONT



**ATTACHMENT B**

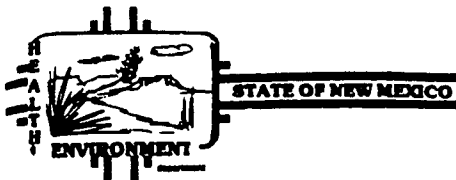
**SPILL REPORT**

## **ATTACHMENT B**

### **Documentation of a Reported Spill**

- **Memorandum to file from Roelf Ruffner, New Mexico Health and Environment Department, July 11, 1988.**
- **General Case Report, Matthew T. Rhoads, Hobbs Police Department, July 8, 1988.**





# MEMORANDUM

RR

DATE: July 11, 1988

TO: FILE - HAZARDOUS WASTE

FROM: Roelf Ruffner, Environmentalist Supervisor, Hobbs Field Office RR

SUBJECT: HAZARDOUS MATERIALS SPILL IN HOBBS

Our office received a report on a chemical spill at N.L. Treating Chemicals at 1600 S. Dal Paso in Hobbs. We contacted the local Police Department. (See attached report)

Bill Huber and I investigated the site and found no problem. Site was cleaned up.

/pdh

GENERAL CASE REPORT 01 2 13 DISTRICT OF OCCURRENCE 13 CHARGE TRACT M 07-08-88 2358 2358 2358 0035

88-410-2358

CASE TYPE  
☐ INCIDENT  
☐ FELONY  
☐ 10-75 APPROPRIATE  
☐ MISDEMEANOR  
☐ MISDEMEANOR

13 OFFENSE OR INCIDENT  
 POSSIBLE CHEMICAL SPILL

14 LOCATION OF OCCURRENCE  
 1600 S DAIPASO HOBBS

17 OCCURRENCE  
 07-08-88 2358 THUR 08-08-88 0035 FRI

21 VICTIM'S NAME (PRINT - LAST, FIRST, MIDDLE) / PHON NAME (ENTER AKA, IF KNOWN, IN PARENTHESES)  
 NL TREATING CHEMICALS

22 VICTIM'S EMPLOYER / SCHOOL (NAME & ADDRESS)  
 PO BOX 1692 HOBBS NM

23 VICTIM'S ADDRESS  
 LAFAUERS, KEN

24 REPORTING PERSON (PRINT - LAST, FIRST, MIDDLE)  
 509 E ASPEN HOBBS

25 DATE OF BIRTH / AGE / SEX / RACE / ETHNICITY / SOCIAL SECURITY NUMBER  
 9-13-41 / 46 / W / M / 458-52-564

26 HOME PHONE / WORK PHONE / REPORTING PERSON EMPLOYER'S / SCHOOL (NAME AND ADDRESS)  
 392-6850 / 392-1518 / NL TREATING CHEMICALS

27 EVENT INFORMATION (PLACE "X" IN ALL BOXES THAT APPLY)

DESCRIPTION OF PLACE AREA (2) TYPE OF STRUCTURE, VEHICLE (1) TARGET (10) ENTRY (2) SECURITY MEASURES (10) EQUIPMENT USED (4) VICTIM CHARACTERISTICS (4) EVIDENCE COLLECTED (14)

1. Description of Place Area (2):  
 1.1 Type of Structure: 1.2 Type of Vehicle: 1.3 Target: 1.4 Entry: 1.5 Security Measures: 1.6 Equipment Used: 1.7 Victim Characteristics: 1.8 Evidence Collected:

28 REPORT SYNOPSIS (RECAPITULATE BASIC ELEMENTS OF OFFENSE OR INCIDENT)

30 INVESTIGATIVE FACTORS YES NO UNKNOWN 31 INVESTIGATIVE STATUS 32 NAME OF DET. NOTIFIED 33 DATE 34 TIME 35 PREPARED BY 36 DATA ENTRY BY 37 PERSON SUBMITTING REPORT (PRINT - LAST, FIRST, MIDDLE, TITLE, JR, SR) 38 DATE/TIME APPROVED 39 SUPERVISOR APPROVED

30 INVESTIGATIVE FACTORS: 31 INVESTIGATIVE STATUS: 32 NAME OF DET. NOTIFIED: 33 DATE: 34 TIME: 35 PREPARED BY: 36 DATA ENTRY BY: 37 PERSON SUBMITTING REPORT: 38 DATE/TIME APPROVED: 39 SUPERVISOR APPROVED:

MISSING/RUNAWAY REPORT 1 TYPE OF REPORT 2 YEAR 3 NAME (PRINT - LAST, FIRST, MIDDLE) ENTER AKA IN PARENTHESES 4 DATE OF BIRTH 5 AGE/RACED SEX 6 SOC. SEC. NO. 7 HGT. 8 WGT. 9 HAIR 10 EYES 11 BUILD 12 COMPLEX 13 PUB FCN/BORN 14 ADDRESS 15 HOME PHONE 16 OCCUPATION (Employer/State) 17 PHYSICAL COND 18 MENTAL COND 19 ARREST NUMBER 20 INDICATION OF DRUGS: 21 JEWELRY WORN 22 MONEY CARRIED 23 PHOTO OBTAINED 24 CLOTHING DESCRIPTION 25 ITEMS MISSING 26 ADDRESS LAST SEEN 27 CITY 28 STATE 29 ZIP 30 DATE/TIME LAST SEEN 31 BY 32 POSSIBLE CAUSE OF ABSENCE 33 PROBABLE DESTINATION 34 PREVIOUS DISAPPEARANCES 35 WHERE LOCATED 36 CITY 37 STATE 38 ZIP 39 NO/DT/YR

NARRATIVE

AT 2358 HRS ON 07-07-88 I (RHoads) WAS DISPATCHED TO THE AREA OF 1600 S. DAIPASO IN REFERENCE TO A POSSIBLE CHEMICAL SPILL.

UPON ARRIVAL I OBSERVED SEVERAL 55 GAL DRUMS FLOATING IN THE YARD OF NL TREATING. I COULD ALSO SMELL A CHEMICAL ODOR.

I CONTACTED MANAGEMENT (LAFAUERS). HE ADVISED ME THAT ALL OF THE DRUMS THAT WERE FLOATING WERE EMPTY AND THAT THE SMELL WAS FROM THE RESIDUE THAT WAS WASHED OUT OF THE EMPTY DRUMS. LAFAUERS ADVISED THAT THE RESIDUE WAS FROM A NONCORROSIVE CHEMICAL THAT IS USED IN OIL WELLS. HE ALSO ADVISED THAT THIS CHEMICAL WOULD NOT BE HAZARDOUS IF IT ENTERED THE SEWER SYSTEM WHEN THE WATER DRAINED. LAFAUERS ADVISED THAT HE WOULD HAVE SOMEONE STACK THE DRUMS NEXT DATE.

DAVID HOOTEN WAS CONTACTED AND DID RESPOND TO THE SCENE.

7-6-88 DAVID HOOTEN ADVISED HE WAS UNABLE TO DETERMINE THE EXACT CHEMICALS INVOLVED BUT BELIEVES THEY WERE CORROSION INHIBITORS. TANUM.



## **ENSR Consulting and Engineering**

Alabama	Florence	(205) 740-8240
Alaska	Anchorage	(907) 276-4302
California	Los Angeles	
	Camarillo	(805) 388-3775
	Newport Beach	(714) 476-0321
	San Francisco	(415) 865-1888
Colorado	Fort Collins	(303) 493-8878
Connecticut	Hartford	(203) 657-8910
Illinois	Chicago	(708) 887-1700
Massachusetts	Boston	(508) 635-9500
Minnesota	Minneapolis	(612) 924-0117
New Jersey	Mahwah	(201) 818-0900
	New Brunswick	(908) 560-7323
Pennsylvania	Pittsburgh	(412) 261-2910
South Carolina	Rock Hill	(803) 329-9690
Texas	Dallas	(214) 960-6855
	Houston	(713) 520-9900
Washington	Seattle	(206) 881-7700
Puerto Rico	San Juan	(809) 769-9509