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GENERAL CORRESPONDENCE

YEAR(S): 1994-1993

TRICO INDUSTRIES, INC.

KOBE HYDRAULIC PUMPS

OIL CONSERVATION DIVISION
P.O. Box 2909 • 3040 East Slauson Avenue, Huntington Park, California 90255
(213) 586-8800 • Telex: 683-1574 • FAX: (213) 586-8808/8809

94 JU 25 AM 8 50

July 22, 1994

Mr. William C. Olson
Oil Conservation Division
Environmental Bureau
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Olson:

After our conversation of July 22, 1994 I'm not sure the consulting firm contracted to work on the Artesia, New Mexico site had responded to your letter requiring additional information before final review and approval to remediate this location.

Enclosed is a revised proposal addressing those issues. If I can be of further help please contact me at (213) 586-8941

Sincerely,

James H. Dunavant

James H. Dunavant
Environmental/Manufacturing Engineer
Trico Industries, Inc.

ERM EnviroClean
Rocky Mountain, Inc.

5950 South Willow Drive
Suite 206
Greenwood Village,
Colorado 80111-5144
(303) 694-7390
(303) 694-7392 (Fax)

October 8, 1993

Mr. Jim Dunavant
Trico Industries
3040 East Slauson Avenue
Huntington Park, CA 90255

ERM

RE: Revised Proposal and Cost Estimate for Remediation and Closure of the old Artesia Site, Artesia, New Mexico

Dear Mr. Dunavant:

Pursuant to our recent conversations, ERM EnviroClean-Rocky Mountain, Inc. and ERM-Rocky Mountain, Inc. (ERM) are pleased to provide this revised proposal and cost estimate as an addendum to our original proposal dated August 26, 1993, for site remediation and clean-up at the Trico Industries' old Artesia Site, in Artesia New Mexico. To address the New Mexico Oil Conservation Division (OCD) requirements outlined in a letter dated August 27, 1993, (see attached) ERM is submitting new Tasks 1, 2 and 3, and a revised Task 4 for your review and approval. Original Tasks 1, 2, 5, and 6 remain as originally proposed.

New Task 1 - Hazardous Waste Characterization of Liquid Wastes

Pursuant to discussions with Mr. William Olson of the OCD, ERM will collect a representative composite sample of all the liquids contained in the 40-gallon and 55-gallon drums, and the 5-gallon buckets (estimated to be 314 gallons of used oil and 65 gallons of other liquids, primarily mixtures of water, antifreeze, gasoline and kerosene) and submit the sample to an analytical laboratory for

determination of hazardous waste characteristics. Based on our knowledge of the materials remaining at the site, we anticipate that no more than two liquid samples will have to be collected. These samples will be analyzed for hazardous characteristics in accordance with the Toxicity Characteristics Leaching Procedure (TCLP EPA Method 1311) for metals, volatile, and semivolatile organic compounds, for ignitability by EPA Method 1010, for corrosivity by EPA Method 1110/150.1, and for reactivity by EPA Method Section 7.3. Process knowledge should allow for the removal of pesticide and herbicide portions of the TCLP analytical procedure.

ERM

New Task 2 - Hazardous Waste Characterization of Stained Soils

This task will consist of the collection of composite soil samples (0 to 24 inches below ground surface) from the 13 areas which were identified in our July 1, 1993 report ("Preliminary Site Investigation of the Old Artesia Site, Artesia, New Mexico") as being visibly impacted. The actual number of composite soil samples to be collected will be based on our assessment of the similarity of potential contaminant sources that have impacted the soils. Based on our knowledge of the site, we anticipate that no more than two soil samples will have to be submitted for laboratory analyses. We will assess the potential contaminant sources that may have impacted the soils, collect discreet samples from each area we determine to have been impacted by the respective contaminant source for compositing purposes, and then collect a composited soil sample for submission to the laboratory. Results of the preliminary site investigation conducted in June 1993 indicate that the soil staining appears to be the result of used oil release and disposal. Pursuant to the OCD request, ERM will also collect a soil sample from the inactive cesspool located in the southwest corner of the property. All samples will be analyzed for hazardous characteristics in accordance with the TCLP (EPA Method 1311) for metals,

volatile, and semivolatile organic compounds, for reactivity by EPA Method Section 7.3, for corrosivity by EPA Method 1110/9045, and for ignitability by EPA Method 1010. Process knowledge should allow for the exclusion of the pesticide and herbicide portions of the TCLP analytical procedure.

ERM

New Task 3 - Inspection of Facility Buildings

This task will consist of performing an inspection of the two facility buildings to identify the presence or absence of any waste materials. The inspection will also include any interior drains located in the buildings, any unused commercial chemical products or manufacturing supplies, and industrial equipment which may be located in either building. These buildings were not included in the scope of work for the preliminary site investigation conducted on June 10, 1993; however, the interior of both buildings appeared to be mostly empty based on observations made through available windows. If suspect hazardous materials are identified during this inspection, Trico representatives will be contacted to determine if samples should be collected and submitted for laboratory analyses to determine whether the material is a regulated hazardous waste. Specific analytical methods and associated costs will be discussed at that time.

An optional part of the New Task 3 is a Preliminary Asbestos Screening of the two facility buildings. The U.S. Environmental Protection Agency (EPA) banned in the U.S. the manufacturing and use of most asbestos-containing building materials by 1978. Prior to the ban, asbestos was a common element in many construction materials. Although less likely, asbestos-containing building materials may also be present in buildings constructed and/or renovated after 1978. Upon your request, ERM can perform a limited asbestos screening of buildings at the site. A limited survey can be useful in identifying the presence of asbestos-containing materials but does not confirm the absence of these

materials and does not evaluate the extent of asbestos-containing materials which may be present. The number of samples to be taken will not likely meet the Asbestos Hazardous Emergency Response Act (AHERA) standards which require a statistically significant sampling scheme. If renovation or demolition of any part of the buildings is anticipated, a comprehensive asbestos inspection and removal may be necessary. The tasks included in a limited survey are described below.

ERM

- Review previously prepared documents, reports, and blueprints and sample analysis results (if available) of asbestos inquiries conducted to date.

- Visually inspect readily accessible areas of all buildings on the property that may contain asbestos materials. Typically, this will include hallways, restrooms, offices, work/living spaces, storage areas, and mechanical rooms. Air plenums, crawl spaces, pipe chases, and roofs are not typically inspected unless requested by you and reasonable access is provided.

- Assess the current physical condition of the identified potential asbestos-containing materials.

- Sample materials in readily accessible areas which may contain asbestos.

No more than ten samples of potential asbestos-containing materials will be taken from each buildings and submitted for analysis. Sampling may include boiler wrap, pipe and duct insulation, thermal insulation, spray-on acoustic and fire-proofing material, vinyl floor tiles and associated mastics/adhesives, surfacing materials and other materials in reasonably accessible areas. The

samples will be analyzed at a U.S. EPA accredited laboratory using the EPA-approved analytical method for bulk samples, polarized light microscopy (PLM).

Revised Task 4 - Remediation Verification Sampling and Analysis

Upon receipt of analytical results from contaminated soils and prior to completion of contaminated soil removal, ERM will prepare a site specific plan for determining the final soil contaminant levels to assess the cleanup success of each remediated area. This plan will be prepared in accordance with OCD's "Guidelines for the Remediation of Leaks, Spills and Releases," and will be submitted to Trico for review and approval prior to submittal to the OCD for approval.

REVISED PROJECT COSTS

This project will be completed on a time and materials basis and our costs will reflect the actual time and expenses required to accomplish this project within the required time frame. Our **REVISED ESTIMATED PROBABLE COST** to complete the tasks described our proposal dated August 26, 1993, adding new Tasks 1, 2, and 3 and revising Task 4 as described above is **$49,081** and is detailed in Table 1. This project cost includes a $500 charge for sample collection, analysis and interpretation of ten potential asbestos-containing materials. This **REVISED ESTIMATED PROBABLE COST** represents our best estimate of the level of effort required to complete the project, based upon information currently available to us. We will not exceed the **REVISED ESTIMATED PROBABLE COSTS** without your approval. If conditions differ substantially from those assumed in preparing this estimate, we will notify you promptly of the situation. All work will be conducted in accordance with ERM

EnviroClean-Rocky Mountain's General Terms and Conditions a copy of which was provided in our original proposal.

PROJECT STAFF AND SCHEDULE

The project staff identified in the original proposal will remain as the project team. ERM is prepared to initiate work on new Tasks 1, 2, 3 and revised Task 4 of this project within one week upon receipt of authorization to proceed. The remaining field tasks outlined in the original proposal will be completed within three to four weeks of receipt of the analytical results and verification plan approval. A standard laboratory analytical turnaround time of two weeks is included in this schedule.

If this proposal is acceptable to you, please attach this addendum to the original proposal dated August 26, 1993, and indicate your agreement by having an authorized officer of Trico Industries, Inc. sign in the space provided in the original proposal and this addendum and return a signed set of copies to us. Upon receipt of your approval, ERM will commence the performance of the services described in this addendum and the original proposal. Thank you for the opportunity to address your concerns with this revised proposal.

Sincerely,

ERM EnviroClean-Rocky Mountain, Inc.

Jana W. Dawson for

Robert A. Arnott, Ph.D.
President

Agreed and Accepted By: Gary Brink

Title: Controller

Date: 10/13/93

EnviroClean-Rocky Mountain's General Terms and Conditions a copy of which was provided in our original proposal.

PROJECT STAFF AND SCHEDULE

ERM

The project staff identified in the original proposal will remain as the project team. ERM is prepared to initiate work on new Tasks 1, 2, 3 and revised Task 4 of this project within one week upon receipt of authorization to proceed. The remaining field tasks outlined in the original proposal will be completed within three to four weeks of receipt of the analytical results and verification plan approval. A standard laboratory analytical turnaround time of two weeks is included in this schedule.

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Sincerely,

ERM EnviroClean-Rocky Mountain, Inc.

James W. Dawson for

Robert A. Arnott, Ph.D.
President

Agreed and Accepted By: _____

Title: _____

Date: _____

TRICO INDUSTRIES, INC.
KOBE HYDRAULIC PUMPS

P.O. Box 2909 • 3040 East Slauson Avenue, Huntington Park, California 90255
(213) 586-8800 • Telex: 683-1574 • FAX: (213) 586-8808/8809

August 16, 1993

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
P.O. Box 2088
Santa Fe, New Mexico 87504-0288

Dear Bill,

In response to our telephone conversation of 8-16-93 I am sending you a copy of the Preliminary Site Investigation ERM has performed on the Trico Artesia facility. As you informed me this will meet the New Mexico state requirement for a written report.

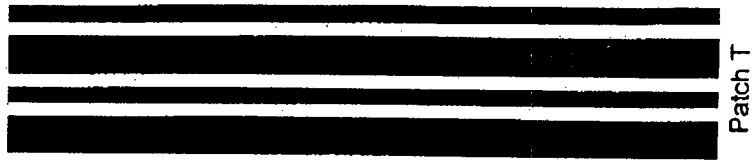
Based on the concentration of TPH found in some of the soil samples we have requested ERM to submit a proposed work plan to define the extent of contamination and recommendations for remediation options. As discussed, any work at this site will be in close coordination with your department and in accordance with New Mexico regulations.

If you have any questions or I can be of further assistance please contact me at (213) 586-8941.

Sincerely,

Jim Dunavant

Jim Dunavant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REPORTS

DATE:

JULY 1991

TRICO INDUSTRIES, INC.
P.O. Box 2909 • 3040 East Slauson Avenue, Huntington Park, California 90255
(213) 586-8800 • Telex: 683-1574 • FAX: (213) 586-8808/8809
KOBE HYDRAULIC PUMPS

July 22, 1994

Mr. William C. Olson
Oil Conservation Division
Environmental Bureau
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Olson:

According to the consulting firm, ERM EnviroClean, submission of the final Remediation and Closure Report for the work performed at the Trico "Old Artesia Site", Artesia, New Mexico, to your department was not accomplished. Therefore, I am sending you a copy of the Final Remediation and Closure Report for your review.

Trico, currently negotiating to sell this property to a third party, would appreciate any efforts by your department to expedite the review and approval for closure of the Artesia remediation project, if the report meets with state clean up regulations.

If you have any questions please contact me at (213) 586-8941.

Sincerely,

James H. Dunavant
Environmental/Manufacturing Engineer
Trico Industries, Inc.

A MEMBER OF THE ENVIRONMENTAL RESOURCES MANAGEMENT GROUP

REMEDIATION AND CLOSURE REPORT
TRICO INDUSTRIES
OLD ARTESIA SITE
ARTESIA, NEW MEXICO

Prepared for:

Trico Industries
3040 East Slauson Avenue
Huntington Park, CA 90255

Prepared by:

ERM EnviroClean-Rocky Mountain, Inc.
5950 South Willow Drive, Suite 206
Greenwood Village, CO 80111-5144

David E. Colburn
Project Superintendent

Paula Bertino
Project Manager

Daniel S. Hinds
General Manager

January 31, 1994

ERM

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TABLES

1.0 INTRODUCTION

Trico Industries, Inc. (Trico) contracted ERM EnviroClean-Rocky Mountain, Inc. (ERM) to remediate the Old Artesia Site located on U.S. Highway 82, approximately 6 miles east of Artesia, New Mexico. The site was the former location of a well field services company that provided maintenance and repair services for well field services equipment. The fenced yard at the site contained old equipment, wheels and tires, wire rope, drums, buckets, and other miscellaneous trash and debris. Many of the drums and buckets contained used motor oil and mixtures of other liquids, including hydraulic oil, antifreeze, gasoline, kerosine and water. Large patches of stained soil were located predominantly on the north half of the property.

2.0 SCOPE OF WORK

ERM conducted a preliminary site investigation of the Old Artesia Site in June 1993. This preliminary investigation included a visual inspection of the site, with the exception of the two buildings; collection of surface soil samples to determine the nature of any contamination; and field screened and sampled the unknown contents of the drums and other containers at the Site to determine the nature of the substances. These efforts were detailed in the ERM report entitled "Preliminary Site Investigation of the Old Artesia Site, Artesia, New Mexico," dated July 1, 1993. Based on the results of this preliminary investigation, ERM proposed a remediation and closure approach to Trico on August 26, 1993, and subsequently revised the proposal on October 8, 1993 to address New Mexico Oil Conservation Division (OCD) concerns outlined in a letter dated August 27, 1993.

Based on these two proposals, the Scope of Work for the remediation and closure of the Old Artesia Site included the following activities:

- environmental inspection of the two buildings present at the site, including identification and sampling of potential asbestos-containing materials and suspect hazardous materials;
- hazardous waste characterization of stained soils;
- hazardous waste characterization of liquid wastes;
- removal and proper disposal of liquids and contaminated soils present at the site;
- removal and proper disposal/recycling of trash and metal debris present at the site;
- verification soil sampling from remediated areas;
- backfilling of excavated areas with clean soil; and
- preparation of a closure report for the site.

3.0 RECONNAISSANCE SITE VISIT

A senior geologist with ERM conducted a reconnaissance visit to the Trico Industries Old Artesia Site, located approximately 6 miles east of Artesia, New Mexico on U.S. Highway 82 on October 21, 1993. The purpose of the visit was to collect composite samples of stained soils and waste liquids identified in the preliminary site inspection performed on June 10, 1993. Additionally, the two buildings located at the site were inspected to assess the presence of any hazardous materials that may be of an environmental concern for potential future sale or lease of the property. The results of these field activities are presented below.

3.1 Soil and Liquid Composite Sampling and Analysis

OCD's letter of August 27, 1993, required stained soils to be analyzed for hazardous waste characteristics to determine disposal options. The number of soil samples collected was dependent upon the similarities of liquids that may have been spilled at the site. Visual inspection of the soil staining at the site on October 21, 1993, indicated that all staining was the result of spillage of used motor oil as it was transferred to 55-gallon drums, or from drips and leaks from vehicles present in the parking lot. Consequently, discrete soil samples (4 ounce volume) were collected from 14 locations, representing the drum storage and soil stained areas indicated in ERM's report of July 1, 1993. These samples were composited and the environmental sample was taken from this composite. Additionally, a soil sample was collected from the former cesspool, located directly below the discharge pipe into the cesspool.

Liquids at the site were comprised of two types: apparent used motor oil; and mixtures of kerosene, gasoline, antifreeze, and water. The used motor oil was present in 55-gallon drums, 5-gallon buckets, and 2-gallon open-top containers. The liquid mixtures were contained in 5-gallon buckets, one 30-gallon drum, and one 55-gallon drum. Discrete samples from the two different types of liquids were collected and composited, and then the environmental sample was collected from this composite. ERM noted that the liquid mixture was bi-phase; only the lighter liquid (i.e., that floating on the water) was to be analyzed by the laboratory.

All soil and liquid samples were managed under Chain-of-Custody protocol and delivered to Assaigai Analytical Laboratories in Albuquerque, New Mexico, on October 22, 1993. The samples were analyzed for (Toxicity Characteristic Leaching Procedure) TCLP volatiles, TCLP semi-volatiles, TCLP metals, corrosivity, reactivity, and ignitability. The following sample identification numbers were used:

TICSS 1 - Composite soil sample from all stained areas at the site;

TICSS 2 - Soil sample collected from directly beneath the discharge pipe into the former cesspool;

TICLS 1 - Composite liquid sample of apparent used oil contained in 55-gallon drums, 5-gallon buckets and other miscellaneous containers; and

TICLS 2 - Composite liquid sample of other liquids (i.e., gasoline, kerosene, antifreeze, water, etc.) contained in 5-gallon buckets, 30-gallon drum, and other containers.

Analytical results indicated that neither the waste liquids or stained soils present at the site were considered hazardous waste. Copies of the original laboratory results are provided in Attachment A. The liquid wastes were subsequently approved for recycling with Mesa Oil, Inc. of Albuquerque, New Mexico, and the hydrocarbon-contaminated soils were approved for treatment/disposal at the Controlled Recovery, Inc. landfarm located in Hobbs, New Mexico.

4.0 BUILDING INSPECTIONS

The two buildings present at the site were also inspected on October 21, 1993, and are shown in detail in Figure 1, the Site Plan. The building located on the west side of the site was used as an office and workshop, and the second building located on the east side of the site was apparently used for materials storage.

4.1 Office Building/Workshop

The office building/workshop is approximately 40 feet by 96 feet, and is constructed of steel structural frame members, with corrugated metal sides and roof, and a concrete slab floor. The building appears to be in generally good condition. The south end of the building consists of a reception/secretarial area, two offices, two restrooms, and a storage room (see Figure 1). The reception area has a ceramic tile floor, while the secretarial area and front office is carpeted. Interior office walls consist of paneling. The ceiling in the reception/secretarial area is textured sheetrock, with the ceiling in the second office consisting of spray-on acoustic texture. Lighting in this area and throughout the rest of the building is provided by fluorescent ceiling lights.

Immediately behind the office/reception area, are the workshop areas. The southern-most workshop area ([Workshop Area #2) contained a large battery, and miscellaneous parts, bolts, tools, and other debris/materials. The concrete floor was in good condition, with only occasional staining noted. Acoustic ceiling tiles are present in this area and wall insulation appears to be fiberglass.

The second workshop area contains miscellaneous tools and machine parts, with a workbench against the south wall. The workbench appeared to be very greasy and heavy staining was noted on the floor around the bench and on the west wall. Three empty paint cans and a motorcycle battery were observed in this area.

The third workshop area had several shelves with miscellaneous machine parts, an old transmission, a large truck universal joint, and other trash/debris laying about. An apparent floor drain, or floor hole for a hydraulic lift was observed. One 5-gallon can of STA-Power oil condition, one 5-gallon bucket of an unknown liquid, and one 1-gallon paint can were noted. A metal plate (6 ft. by 12 ft.) was noted on the floor, with staining around it and some concrete corrosion present near the plate.

The floor in the fourth workshop area was heavily stained with oil several places. One 5-gallon bucket of Barrier Coat Primer (partially full), one 5-gallon bucket of Chevron transmission fluid (full), one 5-gallon bucket of oily rags, one 5-gallon bucket of an unknown liquid, and two 1-gallon paint cans (partially full) were observed. Also observed were two batteries, brake pads, air compressor, two oil filters (used), in addition to three shelves and three workbenches where miscellaneous machine parts were stored.

There is an upstairs storage area above the reception/office area. This area is accessed from the first workshop area, and contained miscellaneous debris/materials, including one 1-gallon can of Chlorothene NU (empty), one case of SAE 30 motor oil, one 1-gallon paint can (partially full), and three 1 quart paint cans (partially full), in addition to file boxes and other miscellaneous debris and equipment. The ceiling insulation for the workshop areas was observed to be fiberglass blankets for approximately one-half of the workshop area and blown-in insulation for the northern half.

Electrical service to the building appears to be standard industrial rating (200 amp), with no transformers or capacitors noted during the inspection. Heating in the reception/office area consists of natural gas-fired wall heaters, while heating in the workshop area consists of natural gas-fired, ceiling mounted space heaters.

4.2 Storage Building

The storage building is approximately 20 feet by 40 feet, with wood timber structural members, and corrugated metal sides and roof. One-half of the building is a three-sided, open front storage area, while the other half has a concrete floor and is fully enclosed. The open-front storage area had several cases of empty 1-gallon Peak Antifreeze containers. Severe soil staining was noted along the southern wall of this area. The concrete-floored part of the building contained miscellaneous tools and machine parts, including one 5-gallon bucket (partially full) of Base Component (Corotar), one 5-gallon bucket of Thinning Spirits (empty), one 5-gallon bucket of hydraulic oil (partially full), two 5-gallon buckets that were very greasy, and three 5-gallon buckets (mostly empty) with some hydraulic oil and used motor oil in them. Several areas of the concrete floor were heavily stained with oil.

5.0 PRELIMINARY ASBESTOS SCREENING SURVEY

ERM conducted a visual inspection of the property buildings for evidence of asbestos-containing building materials on October 21, 1993. The investigation is a preliminary identification of potential asbestos-containing materials (ACMs) and should not be interpreted as a comprehensive asbestos assessment. In addition, the screening is not intended to evaluate the extent of ACMs nor does ERM warrant that all potential ACMs at the subject property have been identified.

5.1 Background Information

Construction materials are uniform throughout each building and typically consist of corrugated metal walls and roofs with timber frames; concrete floors; drywall materials for interior walls; vinyl floor tiles in the office building bathrooms; fiberglass insulation; suspended ceiling with drop-in tiles in Work Area #1; textured sheetrock for the ceiling in the reception/secretarial area; blown-in insulation over Work Areas #3 and #4; and spray-on acoustic texture on the ceiling in the second office.

5.2 Potential Asbestos-Containing Materials

ERM identified and sampled several building materials in the both structures which have historically contained asbestos. No building plans, material specifications, or previous analytical results are available to otherwise determine if the materials in the site buildings do or do not contain asbestos.

Upon receipt of approval from Trico representatives, ERM subsequently sampled the identified potential ACMs on December 21, 1993. The sampled materials identified include: spray-on ceiling texture; vinyl floor tiles and mastic, drop-in ceiling panels, blown-in insulation, and drywall materials on some interior walls and ceilings.

Samples of roofing were not obtained due to roof inaccessibility and the relatively low hazard associated with non-friable materials. In addition, sampling would result in the destruction of sampled materials. The limited sampling program is directed at potentially asbestos-containing friable materials most likely to have a significant monetary impact if they have to be remediated. Friable ACMs also pose a high potential for release of asbestos fibers if disturbed or damaged.

The samples were submitted to Assaigai Analytical Laboratories in Albuquerque, New Mexico for analysis. EPA method 600/M4-82-020 for polarized light microscopy (PLM) analysis was the analytical method utilized. This PLM method is the EPA accepted analytical method for the determination of asbestos content in bulk samples.

5.3 Analytical Results

Based on analytical results received from Assaigai Analytical Laboratories, only the backing on the vinyl floor tile located in the two office building bathrooms contains between 50 to 70 percent asbestos. The entire floor area of these bathrooms is approximately 4 feet X 10 feet and the floor tile is non-friable and appeared to be in good condition during the site inspection. Results may or may not be representative of similar materials located throughout the building.

According to EPA regulations, any sample containing more than one percent asbestos is considered to be an asbestos-containing material. Table 1 presents a detailed location and description of each sample long with the analytical results and Attachment B includes

copies of the original laboratory reports for the asbestos analyses. Asbestos sample locations are also shown in Figure 2.

6.0 SITE CLEANUP AND REMEDIATION

On November 30, and December 1, 1993, ERM assisted with and supervised the cleanup and remediation of the Trico Old Artesia Site. A photograph log of the site cleanup and remediation activities is included in Appendix A.

6.1 Liquids Removal and Disposal

Mesa Oil, Inc. out of Albuquerque, New Mexico collected 355 gallons of non-hazardous liquids consisting of used oil and oily water from the steam cleaning of containers previously holding the used oil. A copy of the Mesa Oil, Inc. shipping manifest is provided in Attachment C.

Contaminated soils where loaded into end-dump trailers for transportation to the Controlled Recovery, Inc. disposal facility. Approximately 164 cubic yards of petroleum contaminated soils were removed from the Trico Industries facility. Copies of the waste manifests and Controlled Recovery, Inc. gate weight tickets are provided in Attachment D.

The contents of four additional containers located in the small storage building could not be collected by Mesa Oil due to the physical condition and potential hazardous waste classification. The containers included one 5-gallon bucket of grease, one 5-gallon bucket containing epoxy base component (Corotar), one 5-gallon bucket of solidified brown paint, and one 30-gallon drum containing approximately 10 gallons of a neopentyl glycol polyester resin. ERM collected a sample of the resin sludge and profiled the contents of all four containers with the Chemical Waste Management facility in Commerce City, Colorado on December 21, 1993. Following receipt of approval, ERM transported the four containers to the Chemical Waste Management facility on January 11, 1994. Copies of the waste profile and shipping manifest are provided in Attachment E.

6.2 Scrap Metal and Trash Segregation and Disposal

The scrap metal and trash at the site were subsequently segregated, and the scrap metal was transported by Trico Industries to the Marsh Pipe & Supply Company facility in Artesia, New Mexico and the trash was taken to the local landfill.

6.3 Excavation and Disposal of Petroleum-Contaminated Soils

Following the segregation and removal of scrap metal and trash, the areas of petroleum-contaminated soil previously identified were excavated and transported to the Controlled Recovery, Inc. landfarm located on the Carlsbad - Hobbs Highway, approximately 45 miles southeast of the site. Approximately 164 cubic yards of soil was excavated with a front-end loader and transported to the landfarm by TAD Trucking out of Hobbs, New

Mexico. Depths of excavation ranged from 18 inches to 4 feet. Field screening using visual observation for determination of petroleum hydrocarbons presence by soil discoloring was used to confirm the depth of each excavation.

6.4 Soil Verification Sampling

Upon completion of contaminated soil excavation and removal, a total of six soil verification samples were collected from random locations and submitted for analysis of Total Petroleum Hydrocarbons (TPH) in accordance with EPA Method 418.1. Results indicate that all but two locations have TPH levels of well below 100 ppm, with the other two locations (TIVS 2 and TIVS 3) having TPH concentrations of 149 ppm and 253 ppm, respectively. The verification soil sample locations are shown in Figure 3 and are described in Table 2. Copies of the original laboratory analytical results are provided in Attachment F.

According to the New Mexico OCD "Guidelines for Remediation of Leaks, Spills and Releases," dated August 13, 1993, the petroleum-contaminated soils at the site were considered unsaturated contaminated soils. Soils which are contaminated with petroleum constituents must be scored according to the ranking criteria listed in Section IV.A.2.a. to determine their relative threat to public health, fresh waters and the environment. The total ranking score determines the degree of remediation that may be required. According to the ground-water report entitled "Geology and Ground-Water Resources of Eddy County, New Mexico, the depth to ground water in the vicinity of the Trico Old Artesia Site is approximately 180 feet which yields a ranking score of 0 for the ground-water criterion. The nearest water well to the site is approximately three miles to the northeast yielding a ranking score of 0 for the wellhead protection criterion. The site is located approximately 1.8 miles east of the Pecos River yielding a ranking score of 0 for the distance to surface water body criterion. The total ranking score for the site is 0. The remediation action level required for a site with a ranking score of 0 is up to 5,000 ppm TPH. Verification sample results for the Old Artesia Site are well below this action level and would be adequate for a site with a total ranking score of up to 20.

6.5 Backfilling of Excavated Areas with Clean Soil

The excavated areas were backfilled with clean soil obtained from a local borrow pit following the collection of the verification soil samples. Two samples of the borrow material (samples TIBS 1 and TIBS 2) were collected and analyzed for total petroleum hydrocarbons in accordance with EPA Method 418.1, to ensure the integrity of the backfill material. Results show no TPH contamination present in the backfill and are presented in Table 2. A copy of the original analytical results is provided in Attachment F. The backfill material was spread with the front-end loader. No compaction, other than that provided by the heavy equipment used to spread the material was undertaken.

7.0 CONCLUSIONS

Based upon the observations recorded during site remediation activities and the analytical results obtained from the analysis, the scope of work described above has been completed. Contaminated soils removal and disposal from the Trico Industries Old Artesia Site was performed and has met the New Mexico old requirements for site remediation of petroleum products soil contamination.

Sources (stored paint, epoxies, petroleum products, etc.) of additional potential site contamination have been removed from the facility and disposed of at an appropriate permitted disposal and/or treatment facility. With the removal of miscellaneous petroleum product materials, waste paint products, and epoxy systems, the risks of environmental impact from current on-site sources have been minimized.

The evaluation of building materials that may be asbestos-containing has indicated that current site use and non-use is not impacted by suspect asbestos-containing materials. In fact only the floor tile backing was determined to contain asbestos and in its present condition is not by definition a friable material. Therefore, only during demolition or extensive remodeling of the facility would worker and public health protection be deemed necessary with the appropriate permits, procedural controls and asbestos abatement procedures implemented.

ATTACHMENT A

Laboratory Results from Hazardous Waste Determination

Assaigai Analytical Labs
7300 Jefferson NE
Albuquerque, NM 87109

Attn: MARLEAH M. MARTIN
Phone: (505)345-8964

ERM ROCKY MOUNTAIN, INC.
2201 BUENA VISTA SE
SUITE 205
ABQ., NM 87106
Attn: JIM DAWSON
Invoice Number:

Order #: 93-10-162
Date: 11/04/93 13:29
Work ID: TRICO INDUSTRIES
Date Received: 10/22/93
Date Completed: 11/03/93
Client Code: ERM01

SAMPLE IDENTIFICATION

Sample Number	Sample Description	Sample Number	Sample Description
01	TICSS1	03	TICLS1
02	TICPS1	04	TICLS2

ND = None Detected D_F = Dilution Factor NT = Not Tested
B = Analyte was present in the blank J = Estimated value
E = Estimated Value, Concentration exceeds calibration range
MULTIPLY THE LIMIT BY THE DILUTION FACTOR.

Certified By
for Marleah Martin

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 • so, Texas 79925

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results By Test

TEST CODE default units	Sample 01 (entered units)	Sample 02 (entered units)	Sample 03 (entered units)	Sample 04 (entered units)
PRCTSX % (Percent)	**N/A**	**N/A**	**N/A**	**N/A**
T8270X N/A	**N/A**	**N/A**	**N/A**	**N/A**
TCLPXX N/A	**N/A**	**N/A**	**N/A**	**N/A**
	N/A	**N/A**	**N/A**	**N/A**
TCLPZX N/A	**N/A**	**N/A**	**N/A**	**N/A**
TCVHGX N/A	**N/A**	**N/A**	**N/A**	**N/A**
TFAAX N/A	**N/A**	**N/A**	**N/A**	**N/A**
TGFAAX N/A	**N/A**	**N/A**	**N/A**	**N/A**

Received: 10/22/93

REPORT
Results by Sample

Work Order # 93-10-162

SAMPLE ID TICSS1

FRACTION 01E   TEST CODE SCORR   NAME CORROSIV(NACE)/SW846 1110
Date & Time Collected 10/21/93 10:25:00   Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Corrosivity (NACE)	ND	6.0	1.0	11/01/93

Notes and Definitions for this Report:

EXTRACTED 10/31/93
ANALYST JCB
UNITS mmpy
BATCH_ID SNACE-003
COMMENTS N/A

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 REPORT Work Order # 93-10-162

Received: 10/22/93 Results by Sample

SAMPLE ID TICSS1 FRACTION 01D TEST CODE SFLASH NAME FLASH POINT/SW846 1010
Date & Time Collected 10/21/93 10:25:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Flash Point	>100	20	1.0	10/29/93

Notes and Definitions for this Report:

EXTRACTED
ANALYST JCB
UNITS Deg Centigrade
BATCH_ID SFLASH-37
PRCNT_MOIST

Received: 10/22/93

Results by Sample

SAMPLE ID **TICSS1** FRACTION **01E** TEST CODE **SPH** NAME **pH/SW846 9045**

Date & Time Collected **10/21/93 10:25:00** Category **SOIL**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
pH	7.2	0.10	1.0	10/28/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS pH Units

BATCH_ID SPH-039

COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 ... 3332 Wedgewood, Suite ... Texas 79...

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICSS1 FRACTION 01D TEST CODE SREACT NAME REACTIVITY/SW846 7-3

Date & Time Collected 10/21/93 10:25:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	NON-REACT	500	1.0	11/02/93
Cyanide	NON-REACT	250	1.0	11/02/93

Notes and Definitions for this Report:

EXTRACTED 11/02/93
ANALYST JCB
UNITS mg/Kg of Waste
BATCH_ID SREACT-23
COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 ... 3332 Wedgewood, Suite E-5 • ...o, Texas 79925

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICSS1 FRACTION 01B TEST CODE T8270 NAME TCLP SVOA/METHOD 1311/8270

Date & Time Collected 10/21/93 10:25:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
2-Methylphenol / O-Cresol	ND	0.0010	2.4	10/28/93
3/4-Methylphenol / M/P-Cresol	ND	0.0020	2.4	10/28/93
Hexachloroethane	ND	0.0010	2.4	10/28/93
Nitrobenzene	ND	0.0010	2.4	10/28/93
Hexachlorobutadiene	ND	0.0010	2.4	10/28/93
2,4,6-Trichlorophenol	ND	0.0010	2.4	10/28/93
2,4,5-Trichlorophenol	ND	0.0010	2.4	10/28/93
2,4-Dinitrotoluene	ND	0.0010	2.4	10/28/93
Hexachlorobenzene	ND	0.0010	2.4	10/28/93
Pentachlorophenol	ND	0.0010	2.4	10/28/93
Pyridine	ND	0.0010	2.4	10/28/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JS

FILE ID S1801.D

UNITS mg/L

BATCH_ID TSVOA-46

TCLP_XT_DATE

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REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICSS1 FRACTION 01C TEST CODE TMETAL NAME TCLP METALS/1311/SW846 AA

Date & Time Collected 10/21/93 10:25:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	0.010	0.0050	1.0	10/27/93	11/01/93
Barium, Ba	1.1	0.50	1.0	10/27/93	10/29/93
Cadmium, Cd	0.037	0.0030	1.0	10/27/93	10/29/93
Chromium, Cr	ND	0.020	1.0	10/27/93	10/29/93
Lead, Pb	0.2	0.10	1.0	10/27/93	10/29/93
Mercury, Hg	0.0004	0.00020	1.0	10/26/93	10/27/93
Selenium, Se	ND	0.0050	1.0	10/27/93	11/01/93
Silver, Ag	ND	0.010	1.0	10/27/93	10/29/93

Notes and Definitions for this Report:

ANALYST KH
UNITS mg/L
BATCH_ID WGFAA-278, WFAA-258, WCVAA-91
TCLP_XT_DATE 10/25/93

REPORT **Work Order # 93-10-162**

Received: 10/22/93 **Results by Sample**

SAMPLE ID **TICSS1** FRACTION **01A** TEST CODE **Z8240** NAME **ZHE/VOA/METHOD 1311/8240**

Date & Time Collected **10/21/93 10:25:00** Category **SOIL**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Vinyl Chloride	ND	0.0010	1.0	10/28/93
1,1-Dichloroethene	ND	0.0010	1.0	10/28/93
Chloroform	ND	0.0050	1.0	10/28/93
1,2-Dichloroethane	ND	0.0010	1.0	10/28/93
2-Butanone (MEK)	0.014	0.0050	1.0	10/28/93
Carbon Tetrachloride	ND	0.0010	1.0	10/28/93
Trichloroethene	ND	0.0010	1.0	10/28/93
Benzene	ND	0.0010	1.0	10/28/93
Tetrachloroethene	ND	0.0010	1.0	10/28/93
Chlorobenzene	ND	0.0010	1.0	10/28/93
1,4-Dichlorobenzene	ND	0.0010	1.0	10/28/93

Notes and Definitions for this Report:

EXTRACTED 10/27/93
ANALYST JS
FILE ID V3407
UNITS mg/L
BATCH_ID TVOA-65
TCLP_XT_DATE ______

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 REPORT Work Order # 93-10-162

Received: 10/22/93 Results by Sample

SAMPLE ID TICPS1 FRACTION 02E TEST CODE SCORR NAME CORROSIV(NACE)/SW846 1110
Date & Time Collected 10/21/93 11:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Corrosivity (NACE)	ND	6.0	1.0	11/01/93

Notes and Definitions for this Report:

EXTRACTED 10/31/93
ANALYST JCB
UNITS mmpy
BATCH_ID SNACE-003
COMMENTS N/A

Received: 10/22/93

REPORT
Results by Sample

Work Order # 93-10-162

SAMPLE ID TICPS1

FRACTION 02D TEST CODE SFLASH NAME FLASH POINT/SW846 1010
Date & Time Collected 10/21/93 11:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Flash Point	>100	20	1.0	10/29/93

Notes and Definitions for this Report:

EXTRACTED ____
ANALYST JCB
UNITS Deg Centigrade
BATCH_ID SFLASH-37
PRCNT_MOIST ___

Page 11 REPORT Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID **TICPS1** FRACTION **02E** TEST CODE **SPH** NAME **pH/SW846 9045**

Date & Time Collected **10/21/93 11:00:00** Category **SOIL**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
pH	7.4	0.10	1.0	10/28/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS pH Units

BATCH_ID SPH-039

COMMENTS N/A

SAMPLE ID TICPS1 FRACTION 02D TEST CODE SREACT NAME REACTIVITY/SW846 7-3

Date & Time Collected 10/21/93 11:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	NON-REACT	500	1.0	11/02/93
Cyanide	NON-REACT	250	1.0	11/02/93

Notes and Definitions for this Report:

EXTRACTED 11/02/93
ANALYST JCB
UNITS mg/Kg of Waste
BATCH_ID SREACT-23
COMMENTS N/A

SAMPLE ID TICPS1 FRACTION 02B TEST CODE T8270 NAME TCLP SVOA/METHOD 1311/8270

Date & Time Collected 10/21/93 11:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
2-Methylphenol / O-Cresol	ND	0.0010	2.6	10/28/93
3/4-Methylphenol / M/P-Cresol	ND	0.0020	2.6	10/28/93
Hexachloroethane	ND	0.0010	2.6	10/28/93
Nitrobenzene	ND	0.0010	2.6	10/28/93
Hexachlorobutadiene	ND	0.0010	2.6	10/28/93
2,4,6-Trichlorophenol	ND	0.0010	2.6	10/28/93
2,4,5-Trichlorophenol	ND	0.0010	2.6	10/28/93
2,4-Dinitrotoluene	ND	0.0010	2.6	10/28/93
Hexachlorobenzene	ND	0.0010	2.6	10/28/93
Pentachlorophenol	ND	0.0010	2.6	10/28/93
Pyridine	ND	0.0010	2.6	10/28/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JS

FILE ID S1802.D

UNITS mg/L

BATCH_ID TSVOA-46

TCLP_XT_DATE

SAMPLE ID **TICPS1** FRACTION **02C** TEST CODE **TMETAL** NAME **TCLP METALS/1311/SW846 AA**
Date & Time Collected **10/21/93 11:00:00** Category **SOIL**

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	0.006	0.0050	1.0	10/27/93	11/01/93
Barium, Ba	1.0	0.50	1.0	10/27/93	10/29/93
Cadmium, Cd	ND	0.0030	1.0	10/27/93	10/29/93
Chromium, Cr	ND	0.020	1.0	10/27/93	10/29/93
Lead, Pb	ND	0.10	1.0	10/27/93	10/29/93
Mercury, Hg	ND	0.00020	1.0	10/26/93	10/27/93
Selenium, Se	ND	0.0050	1.0	10/27/93	11/01/93
Silver, Ag	ND	0.010	1.0	10/27/93	10/29/93

Notes and Definitions for this Report:

ANALYST KH
UNITS mg/L
BATCH_ID WGFAA-278, WFAA-258, WCVAA-91
TCLP_XT_DATE 10/25/93

SAMPLE ID TICPS1 FRACTION 02A TEST CODE Z8240 NAME ZHE/VOA/METHOD 1311/8240

Date & Time Collected 10/21/93 11:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Vinyl Chloride	ND	0.0010	1.0	10/26/93
1,1-Dichloroethene	ND	0.0010	1.0	10/26/93
Chloroform	ND	0.0050	1.0	10/26/93
1,2-Dichloroethane	ND	0.0010	1.0	10/26/93
2-Butanone (MEK)	ND	0.0050	1.0	10/26/93
Carbon Tetrachloride	ND	0.0010	1.0	10/26/93
Trichloroethene	ND	0.0010	1.0	10/26/93
Benzene	ND	0.0010	1.0	10/26/93
Tetrachloroethene	ND	0.0010	1.0	10/26/93
Chlorobenzene	ND	0.0010	1.0	10/26/93
1,4-Dichlorobenzene	ND	0.0010	1.0	10/26/93

Notes and Definitions for this Report:

EXTRACTED 10/25/93
ANALYST JS
FILE ID V3379
UNITS mg/L
BATCH_ID TVOA-65
TCLP_XT_DATE

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REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS1 FRACTION 03B TEST CODE T8270 NAME TCLP SVOA/METHOD 1311/8270

Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
2-Methylphenol / O-Cresol	0.014	0.0010	4.0	10/28/93
3/4-Methylphenol / M/P-Cresol	ND	0.0020	4.0	10/28/93
Hexachloroethane	ND	0.0010	4.0	10/28/93
Nitrobenzene	ND	0.0010	4.0	10/28/93
Hexachlorobutadiene	ND	0.0010	4.0	10/28/93
2,4,6-Trichlorophenol	ND	0.0010	4.0	10/28/93
2,4,5-Trichlorophenol	ND	0.0010	4.0	10/28/93
2,4-Dinitrotoluene	ND	0.0010	4.0	10/28/93
Hexachlorobenzene	ND	0.0010	4.0	10/28/93
Pentachlorophenol	ND	0.0010	4.0	10/28/93
Pyridine	ND	0.0010	4.0	10/28/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JS

FILE ID S1803.D

UNITS mg/L

BATCH_ID TSVOA-46

TCLP_XT_DATE

Received: 10/22/93

REPORT
Results by Sample

Work Order # 93-10-162

SAMPLE ID TICLS1   FRACTION 03C   TEST CODE TMETAL   NAME TCLP METALS/1311/SW846 AA
Date & Time Collected 10/21/93 11:45:00   Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	ND	0.0050	1.0	10/27/93	11/01/93
Barium, Ba	0.7	0.50	1.0	10/27/93	10/29/93
Cadmium, Cd	ND	0.0030	1.0	10/27/93	10/29/93
Chromium, Cr	ND	0.020	1.0	10/27/93	10/29/93
Lead, Pb	ND	0.10	1.0	10/27/93	10/29/93
Mercury, Hg	ND	0.00020	1.0	10/26/93	10/27/93
Selenium, Se	ND	0.0050	1.0	10/27/93	11/01/93
Silver, Ag	ND	0.010	1.0	10/27/93	10/29/93

Notes and Definitions for this Report:

ANALYST KH
UNITS mg/L
BATCH_ID WGFAA-278, WFAA-258, WCVAA-91
TCLP_XT_DATE 10/25/93

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 W...ood, ... 5 • ... Texas 7...

REPORT
Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS1

FRACTION 03F TEST CODE WCORR NAME CORROS(NACE)/SW846 1110
Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Corrosivity (NACE)	ND	6.0	1.0	11/01/93

Notes and Definitions for this Report:

EXTRACTED
ANALYST JCB
UNITS mmpy
BATCH_ID WNACE-001
COMMENTS N/A

ANALYTICAL L RATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 • ...o, Texas 79925

REPORT
Results by Sample

Work Order # 93-10-162

Received: 10/22/93

SAMPLE ID TICLS1

FRACTION 03D TEST CODE WFLASH NAME FLASH POINT/SW846 1010
Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Flash Point	>100	20	1.0	10/29/93

Notes and Definitions for this Report:

EXTRACTED ______
ANALYST JCB
UNITS Deg Centigrade
BATCH_ID WFLASH-049
COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Westgrewood, Suite E-5 so, Texas 79925

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS1 FRACTION 03G TEST CODE WPH NAME pH/EPA 150.1

Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
pH	6.0	0.10	1.0	10/22/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JB

UNITS pH Units

BATCH_ID WPH-146

COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 • so, Texas 79925

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS1 FRACTION 03H TEST CODE WREACT NAME REACTIVITY/SW846 7-3

Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	NON-REACT	500	1.0	11/02/93
Cyanide	NON-REACT	250	1.0	11/02/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS mg/Kg of Waste

BATCH_ID WREACT-13

COMMENTS N/A

SAMPLE ID TICLS1 FRACTION 03A TEST CODE Z8240 NAME ZHE/VOA/METHOD 1311/8240
Date & Time Collected 10/21/93 11:45:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Vinyl Chloride	ND	0.0010	10	10/28/93
1,1-Dichloroethene	ND	0.0010	10	10/28/93
Chloroform	ND	0.0050	10	10/28/93
1,2-Dichloroethane	ND	0.0010	10	10/28/93
2-Butanone (MEK)	ND	0.0050	10	10/28/93
Carbon Tetrachloride	ND	0.0010	10	10/28/93
Trichloroethene	ND	0.0010	10	10/28/93
Benzene	ND	0.0010	10	10/28/93
Tetrachloroethene	ND	0.0010	10	10/28/93
Chlorobenzene	ND	0.0010	10	10/28/93
1,4-Dichlorobenzene	ND	0.0010	10	10/28/93

Notes and Definitions for this Report:

EXTRACTED 10/27/93
ANALYST JS
FILE ID V3408
UNITS mg/L
BATCH_ID TVOA-65
TCLP_XT_DATE

SAMPLE ID TICLS2 FRACTION 04B TEST CODE T8270 NAME TCLP SVOA/METHOD 1311/8270

Date & Time Collected 10/21/93 12:20:00 Category BIPHASIC_LIQ

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
2-Methylphenol / O-Cresol	ND	0.0010	3,400	10/29/93
3/4-Methylphenol / M/P-Cresol	ND	0.0020	3,400	10/29/93
Hexachloroethane	ND	0.0010	3,400	10/29/93
Nitrobenzene	ND	0.0010	3,400	10/29/93
Hexachlorobutadiene	ND	0.0010	3,400	10/29/93
2,4,6-Trichlorophenol	ND	0.0010	3,400	10/29/93
2,4,5-Trichlorophenol	ND	0.0010	3,400	10/29/93
2,4-Dinitrotoluene	ND	0.0010	3,400	10/29/93
Hexachlorobenzene	ND	0.0010	3,400	10/29/93
Pentachlorophenol	ND	0.0010	3,400	10/29/93
Pyridine	ND	0.0010	3,400	10/29/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JS

FILE ID S1815.D

UNITS mg/L

BATCH_ID TSVOA-46

TCLP_XT_DATE

SAMPLE ID **TICLS2** FRACTION **04C** TEST CODE **TMETAL** NAME **TCLP METALS/1311/SW846 AA**
Date & Time Collected **10/21/93 12:20:00** Category **BIPHASIC_LIQ**

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	ND	0.0050	1.0	10/27/93	11/01/93
Barium, Ba	0.4	0.50	1.0	10/27/93	10/29/93
Cadmium, Cd	ND	0.0030	1.0	10/27/93	10/28/93
Chromium, Cr	ND	0.020	1.0	10/27/93	10/29/93
Lead, Pb	ND	0.10	1.0	10/27/93	10/29/93
Mercury, Hg	0.0004	0.00020	1.0	10/26/93	10/27/93
Selenium, Se	ND	0.0050	1.0	10/27/93	11/01/93
Silver, Ag	ND	0.010	1.0	10/27/93	10/29/93

Notes and Definitions for this Report:

ANALYST KH
UNITS mg/L
BATCH_ID WGFAA-278, WFAA-258, WCVAA-91
TCLP_XT_DATE 10/25/93

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REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS2 FRACTION 04F TEST CODE WCORR NAME CORROS(NACE)/SW846 1110

Date & Time Collected 10/21/93 12:20:00 Category BIPHASIC_LIQ

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Corrosivity (NACE)	ND	6.0	1.0	11/01/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS mmpy

BATCH_ID WNACE-001

COMMENTS N/A

Received: 10/22/93

REPORT

Results by Sample

Work Order # 93-10-162

SAMPLE ID **TICLS2**

FRACTION **04D** TEST CODE **WFLASH** NAME **FLASH POINT/SW846 1010**

Date & Time Collected **10/21/93 12:20:00** Category **BIPHASIC LIQ**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Flash Point	>100	20	1.0	10/29/93

Notes and Definitions for this Report:

EXTRACTED ______
ANALYST JCB
UNITS Deg Centigrade
BATCH_ID WFLASH-049
COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 • so, Texas 79925

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS2 FRACTION 04G TEST CODE WPH NAME pH/EPA 150.1

Date & Time Collected 10/21/93 12:20:00 Category BIPHASIC_LIQ

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
pH	6.0	0.10	1.0	10/22/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JB

UNITS pH Units

BATCH_ID WPH-146

COMMENTS

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 ... Texas 79925

 REPORT Work Order # 93-10-162

Received: 10/22/93 Results by Sample

SAMPLE ID **TICLS2** FRACTION **04E** TEST CODE **WREACT** NAME **REACTIVITY/SW846 7-3**

Date & Time Collected **10/21/93 12:20:00** Category **BIPHASIC_LIQ**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	NON-REACT	500	1.0	11/02/93
Cyanide	NON-REACT	250	1.0	11/02/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS mg/Kg of Waste

BATCH_ID WREACT-13

COMMENTS N/A

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3332 Wedgewood, Suite E-5 • [illegible], Texas 7[illegible]

REPORT

Work Order # 93-10-162

Received: 10/22/93

Results by Sample

SAMPLE ID TICLS2 FRACTION 04H TEST CODE WREACT NAME REACTIVITY/SW846 7-3

Date & Time Collected 10/21/93 12:20:00 Category BIPHASIC_LIQ

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	NON-REACT	500	1.0	11/02/93
Cyanide	NON-REACT	250	1.0	11/02/93

Notes and Definitions for this Report:

EXTRACTED

ANALYST JCB

UNITS mg/Kg of Waste

BATCH_ID WREACT-13

COMMENTS N/A

SAMPLE ID **TICLS2** FRACTION **04A** TEST CODE **Z8240** NAME **ZHE/VOA/METHOD 1311/8240**

Date & Time Collected **10/21/93 12:20:00** Category **BIPHASIC_LIQ**

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Vinyl Chloride	ND	0.0010	10	10/28/93
1,1-Dichloroethene	ND	0.0010	10	10/28/93
Chloroform	ND	0.0050	10	10/28/93
1,2-Dichloroethane	ND	0.0010	10	10/28/93
2-Butanone (MEK)	ND	0.0050	10	10/28/93
Carbon Tetrachloride	ND	0.0010	10	10/28/93
Trichloroethene	ND	0.0010	10	10/28/93
Benzene	ND	0.0010	10	10/28/93
Tetrachloroethene	ND	0.0010	10	10/28/93
Chlorobenzene	ND	0.0010	10	10/28/93
1,4-Dichlorobenzene	ND	0.0010	10	10/28/93

Notes and Definitions for this Report:

EXTRACTED 10/27/93
ANALYST JS
FILE ID V3409
UNITS mg/L
BATCH_ID TVOA-65
TCLP_XT_DATE

ATTACHMENT B

Laboratory Results for Asbestos Analyses

ANALYTICAL L/ ATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 5332 Wedgewood, Suite E • F , Texas

To: ERM - Rocky Mountain, Inc.
Attn: Paula Bertino
2201 Buena Vista SE, Suite 205
Albuquerque, NM 87106

Date: 22 December 1993
Work Order No. BB11802
Bulk Asbestos Analysis
No. of Analyses: 08
No. of Samples: 07

Method: Each sample has been analyzed following the EPA Interim Method of the Determination of Asbestos in Bulk Insulation Samples (EPA-600/M4-82-020) and as cited in 40 CFR Part 763, Subp. F, Appendix A, Section 1, comparing the quantity of non-asbestos material to asbestos fibers. Detection Limit: 1 % of the portion of the sample examined.

Sampling Site: **Trico Industries**

SAMPLE ID.	DESCRIPTION	ASBESTOS TYPE	% ASBESTOS	OTHER FIBERS	% CONTENT	MATRIX
ASB-1	Brown Insulation	NAD	-----	Glass	> 75	None
ASB-2	White Ceiling Texture	NAD	-----	None	-----	Mica, Calcite Clay
ASB-3	Light Gray Linoleum (50%)	NAD	-----	None	-----	Plastic, Sponge
	Gray Backing (50%)	Chrysotile	50 - 75	Plant	10 - 30	Clay
	Total Asbestos		10 - 30			
ASB-4	Brown-White Sheetrock	NAD	-----	Plant	10 - 30	Gypsum
ASB-5	Brown Ceiling Tile	NAD	-----	Plant Glass	50 - 75 10 - 30	Perlite
ASB-6	Brown-White Sheetrock	NAD	-----	Plant	10 - 30	Gypsum
ASB-7	White Paint/Texture/Sheetrock	NAD	-----	Plant	5 - 10	Calcite Clay, Gypsum

NAD = NO ASBESTOS DETECTED

Analyst - George W. Hazlett GW Hazlett

These results relate only to the above samples as submitted unless otherwise noted. We appreciate the opportunity to perform analytical work for you. If you have any questions, please call.

Respectfully submitted,

Marian C. Wrage
Asbestos Laboratory Manager

ATTACHMENT C

Mesa Oil Shipping Manifest

MESA OIL, Inc.

RECYCLING MANIFEST / RECEIPT

53621

DATE 12-1-93 SERVICE CALL #: 040979

GENERATOR

Generator Name TRICO INDUSTRIES Contact JIM DAWSON

Pickup Address U.S. HIGHWAY 82 EAST Phone 505-243-3330

City ARTESIA State NM Zip

Mailing Address c/o ERM, 2201 BUENA VISTA, S.E., SUITE 205

City ALBUQUERQUE State NM Zip 87106

RECYCLING SERVICE	QUANTITY/UNIT	PRICE/UNIT	TOTAL
USED OIL REMOVAL			
OILY WATER REMOVAL	355	.72 per GAL	$255.60
USED ANTI FREEZE REMOVAL			
USED FILTER REMOVAL			
Fright Charge	Start 038023 End 038305	564 miles 1.00	564.00

SALES TAX 44.05

TOTAL DUE MESA OIL $ 819.60

FORM OF PAYMENT
CASH:
CHECK #:
CHARGE
P.O. #
CUST. #
CREDIT APPLICATION NO. 03530
TERMS: NET 30 DAYS
INVOICE TO FOLLOW

TESTED FOR HALOGENS BY: Victor Vigil

SPECIAL INSTRUCTIONS Fright charge $1.00 per miles starting mileage 038023 Ending mileage 038305

GENERATORS CERTIFICATION:
This material is described to the best of my ability. This material has not been mixed with PCB's or hazardous waste listed in 40 C.F.R. part 262.

JAMES W. DAWSON — James W. Dawson — 12/1/93
Printed / Typed Name — Signature — Date

TRANSPORTER, STORER AND RECYCLER

MESA OIL, INC.
4701 Broadway SE
Albuquerque, NM 87105
(505) 877-8855
EPA # NMD 007109085
TEXAS TWC ID# 40849

MESA OIL, INC.
7300 HWY 72
Golden, CO 80403
(303) 940-0652
EPA #COD 983772955

IN CASE OF SPILL CONTACT: MESA OIL, INC. 1-800-USED OIL

D.O.T. REQUIREMENT — MAXIMUM LOAD 7000 GALLONS
OIL N.O.S. COMBUSTIBLE LIQUID

TRANSPORTER ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS

Victor Vigil — Victor Vigil — 12-1-93
Printed / Typed Name — Signature — Date

TREATMENT FACILITY OPERATOR
The described materials were handled by me, the treatment facility named above, and were accepted.

M. Andrews — Michael Andrews — 12-6-93
Printed / Typed Name — Signature — Date

White - Return to Generator Green - Office Yellow - Collection Pink - Plant Goldenrod - Generator Copy

BPS FORM 3065

MESA OIL, Inc.

RECYCLING MANIFEST / RECEIP

53621

12-1-93 SERVICE CALL #: 040979

GENERATOR

Generator Name TRICO INDUSTRIES Contact JIM DAWSON

Pickup Address U.S HIGHWAY 82 EAST Phone 505 748-3330

City ARTESIA State NM Zip

Mailing Address C/O ERM, 2301 RIENA VISTA, S.E., SUITE 205

City ALBUQUERQUE State NM Zip 87106

RECYCLING SERVICE	QUANTITY/UNIT	PRICE/UNIT	TOTAL
USED OIL REMOVAL			
OILY WATER REMOVAL	355	.72 per GAL	$255.60
USED ANTI FREEZE REMOVAL			
USED FILTER REMOVAL			
		SALES TAX	
		TOTAL DUE MESA OIL	$

FORM OF PAYMENT
CASH:
CHECK #:
CHARGE
P.O. #
CUST. #
CREDIT APPLICATION NO. 03530
TERMS: NET 30 DAYS
INVOICE TO FOLLOW

TED FOR HALOGENS BY: Victor Vigil

SPECIAL INSTRUCTIONS Freight charge $1.00 per Mile Starting mileage 038023 Ending mileage 038305

GENERATORS CERTIFICATION:
his material is described to the best of my ability. This material has not been mixed with PCB's or hazardous waste listed in 40 C.F.R. part 262.

Printed / Typed Name Signature Date 12/1/93

TRANSPORTER, STORER AND RECYCLER

MESA OIL, INC. EPA # NMD 007109085
1701 Broadway SE TEXAS TWC ID# 40849
Albuquerque, NM 87105
(505) 877-8855

MESA OIL, INC. EPA #COD 983772955
17300 HWY 72
Golden, CO 80403
(303) 940-0652

IN CASE OF SPILL CONTACT: MESA OIL, INC. 1-800-USED OIL

D.O.T. REQUIREMENT — MAXIMUM LOAD 7000 GALLONS
OIL N.O.S. COMBUSTIBLE LIQUID

TRANSPORTER ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS

Victor Vigil Victor Vigil 12-1-93
Printed / Typed Name Signature Date

TREATMENT FACILITY OPERATOR
The described materials were handled by me, the treatment facility named above, and were accepted.

Printed / Typed Name Signature Date

White - Return to Generator Green - Office Yellow - Collection Pink - Plant Goldenrod - Generator Copy

BPS FORM 3065

ATTACHMENT D

TAD Trucking Shipping Manifests
and
Weight Tickets to Controlled Recovery, Inc. for Waste Disposal

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 01

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil		1 Truck

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
	James W. Dawson 12/1/93

Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	W. L. Pair 12-1-93

Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	12193

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 02

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil		1 Truck

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
	James W. Adams 12/1/93

Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	Kelly Stewart 12-1-93

Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	John Allgaier 12/1/93

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 03

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil		1 Truck

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative) — Signature: mo/dy/yr — James A. Dawson

Name of Transporter: (Driver) — Signature: mo/dy/yr

TAD Trucking Company — Wm L Porter — 12-1-93

Disposal Site: — Signature: mo/dy/yr

Controlled Recovery, Inc. — 12/9

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 04

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil	1 Truck	

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
	James W. Darrow 12/1/93
Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	Kelly Stewart 12-1-93
Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	John Gillis 12/1/93

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 05

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil		1 Truck

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
Dave Colborn	Dave Colborn 12-1-93
Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	W.M. Powell 12-1-93
Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	12/9

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 06

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil	1 Truck	

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
Dave Colburn	Dave Colburn 12-1-93
Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	Kelly Stewart 12-1-93
Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	12 1 93

TAD TRUCKING COMPANY
HOBBS, N.M.

MANIFEST 07

Shipping Facility Name & Address:	Disposal Site:
Trico Industries U.S. Hwy #82 E Artesia, N.M.	Controlled Recovery, Inc. Carlsbad Highway Halfway, New Mexico

Transporter Name & Address:	Transporter US EPA#
TAD Trucking Company P.O. Box 584 Hobbs, NM 88240 (505) 393-1010	EPA NMD 175551621 Transporter State ID# NMSCC33789 Transmitter Permit # MC 202629 Texas Water Comm# 41492

Full Description of Waste:	Container No. Type	Total Quantity
A) Hydrocarbon Contaminated Soil		1 Truck

Special handling instructions and additional information: Should a spill occur, please notify TAD Trucking Company(505) 393-1010. Contanin Hydrocarbon Contaminated Soils.

TAD Trucking Company is providing transportation "only". TAD did not advise or recommend any designated disposal site or method.

Name: ERM/Rocky Mtn. (Representative)	Signature: mo/dy/yr
DAVE COLBURN	Dave Colburn 12-2-93
Name of Transporter: (Driver)	Signature: mo/dy/yr
TAD Trucking Company	Kelly Stewart 12-2-93
Disposal Site:	Signature: mo/dy/yr
Controlled Recovery, Inc.	12 2 93

NO. 212220

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. 01

TRAILER NO. 8810

CARRIER TAD

WEIGHER NAVAJO

TRICO - ARTESIA N.M.

79940 LB 09:08 AM 12/01/93

GROSS

TARE

NET

NO. 272223

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. 02

TRAILER NO. 8848

CARRIER TAD 301

WEIGHER Fully NAVAJO

LOADED

79620 LB 09:12 AM 12/01/93

GROSS

TARE

NET

NO. 272229

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. 03

TRAILER NO. 307-8810

CARRIER TAD

WEIGHER NAVAJO

TRICO - Artesia N.M.

77340 LB 12:15 PM 12/01/93

GROSS

TARE

NET

NO. 272230

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. 04

TRAILER NO. 8848

CARRIER TAD 301

WEIGHER NAVAJO

70880 L9 12:17 PM 12/01/93

GROSS

TARE

NET

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. Light Weight

TRAILER NO. 8848

CARRIER JAD 301

WEIGHER NAVAJO

32960 LB 11:30 AM 12/01/93

GROSS

TARE

NET

NO. 272228

WEIGHT TICKET

DATE SHIPPED 12-1-93

MANIFEST NO. _____

TRAILER NO. 307-8210

CARRIER TAI

WEIGHER NAVAJO

TRICO - ARTESIA

Light Weight

31940 LB 11:31 AM 12/01/93

GROSS

TARE

NET

ATTACHMENT E

Waste Profile and Shipping Manifest from Chemical Waste Management

CONFIRMATION LETTER

December 30, 1993

CUSTOMER NAME & MAILING ADDRESS
Trico Industries
Highway 82, 6 Miles East
Artesia, New Mexico 88210

CUSTOMER BILLING ADDRESS
ERM-Rocky Mountain
5950 South Willow Drive, Suite 200
Englewood, Colorado 80110

Re: Profile Number BJ4057

Dear Dan:

We are pleased to confirm CWM's approval of your waste materials as described below. The profile was prepared based upon information provided by you and CWM. This information is necessary for CWM to safely manage your waste in accordance with applicable local, state and Federal laws and regulations. It is important that no changes be made to the profile without the consent of CWM. You may signify your acceptance of CWM's services and prices by calling and scheduling your order request to (303) 289-4827.

Waste Name: Neopentyl Glycol Polyester Sludge

Disposal Method: Supplemental Fuels and/or Destructive Incineration

Storage/Transfer Facility: N/A

Disposal Price: See disposal notes

Transportation Pricing: See disposal notes

Demurrage: See disposal notes

Waste Approval Expiration Date: December 30, 1993

Payment Terms: Net 30 days upon receipt of invoices

Special Conditions: A SIGNED AND COMPLETED "LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM" MUST ACCOMPANY EACH LOAD.

Applicable state and local taxes are not included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. All terms are governed by the Service Agreement between our companies. The prices quoted above are subject to change by CWM upon thirty (30) days prior written notice to you or per the terms of our Agreement.

If you have any questions, please contact Cindy L. Elliott, Customer Service Representative (303) 289-4827. Thank you for this opportunity to be of service to you.

DISPOSAL NOTES

WASTE MINIMIZATION 55 Gal. Drums, liquid		WASTE MINIMIZATION 55 Gal. Drums, solids
1 - 3	$190.00/drum	$630.00/drum
4 - 9	$145.00/drum	$590.00/drum
10 - 24	$125.00/drum	$580.00/drum
25+	$108.00/drum	$565.00/drum

Supplemental Fuels Surcharge:

BTU's	Halogenated	Drums
>10,000	<3%	No Charge
> 8,000	<5%	$ 45.00/drum
> 6,000	<8%	$120.00/drum

Solid Surcharges:
Nonpumpable solids in liquid drums will be charged at Waste Minimization ($12.00/gal of Solids) or Destructive Incineration ($17.00/gal solids) rated depending upon the characteristics.

DESTRUCTIVE INCINERATION 55 Gal. Solid Drums	
1 - 3	$945.00/drum
4 - 9	$910.00/drum
10 - 24	$890.00/drum
25+	$880.00/drum

DISPOSAL NOTES (CONT.)

Oil & Solvent Process Company

A. TRANSPORTATION: These prices do not include any transportation cost. See following schedule for transportation rates. Please note that these charges only apply to OSCO transportation. If common carriers of Chemical Waste Management, Inc. transportation is used pricing will be given on a case by case basis:

AREA	PER DRUM	PER BULK PICK-UP
Metro Denver, CO	$ 7.00/drum	$ 125.00
50 - 100 miles from Denver	$12.00/drum	$ 375.00
100 - 150 miles from Denver	$17.00/drum	$ 625.00
Metro Salt Lake City, UT or		
Metro Albuquerque, NM	$18.00/drum	$1,050.00
50 - 100 miles from metro area	$23.00/drum	$1,100.00
100 - 150 miles from metro area	$28.00/drum	$1,150.00

Contact your local Sales Representative or Customer Service Representative for surcharges in areas other than those listed above.

B. APPROVAL FEES: $300

C. REJECTED LOADS: A return charge of $500.00 (plus applicable transportation zone charges) will be assessed for wastes that do not fall within compliance of the declared composition on the approved Waste Profile Sheet.

D. DEMURRAGE: Allowed loading or unloading time is 1½ hours. Excess time is charged at $65.00/hour.

E. OVERPACK DRUMS: Handling fee - $50.00/overpack drum. Transfer of damaged containers to overpack - $90.00/drum.

F. TAXES: Any taxes associated with the ultimate disposal of wastes will be charges at cost.

G. CREDITS: Liquid wastes are discounted 10% if like volume of product is purchased at the time of waste pick-up.

H. BURNABLE CONTAINERS: Special pricing is available for wastes shipped in burnable containers. Contact you local Sales Representative or Customer Service Representative for quotes.

I. SCHEDULING: Please call our Service Center Scheduling Department at (303) 289-4827 to schedule all shipments before the shipment is made.

.ed 12/30/93 Chemical Waste Management, Inc. DEC 30 93 10:50 NO.011 P.15

WA PROFILE Profile #

..ok here if this is a Recertification LOCATION OF ORIGINAL O.S.C.O - COLORADO

ERA.. ..RMATION

Gene.. .r Name: TRICO INDUSTRIES

Generator USEPA ID: NMD108381559

Ge.. ..ator Address: HWY 82 6 MILES EAST

Billing Address: (_) Same

ERM-ROCKY MOUNTAIN

5950 SOUTH WILLOW DRIVE

AR...IA NM 88210

SUITE 200

Te.. ..ical

Co.. ..ct/Phone: DAN HINDS 303/694-7390

ENGLEWOOD CO 80111-0000

Alternate

Contact/Phone:

Billing

Contact/Phone: DAN HINDS 303/694-7390

..PE...ES AND COMPOSITION

Process Generating Waste: OFF SPEC FIBERGLASS RESIN

Wa.. .. Name: NEOPENTYL GLYCOL POLYESTER SLUDGE

..s this a USEPA hazardous waste (40 CFR Part 261)? Yes (X) No (_)

Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U): D001

State Waste Codes:

Physical State @ 70F: A. Solid(_) Liquid(_) Both(X) Gas(_) B. Single Layer (_) Multilayer (X) C. Free liq. range 0 to 15%

p.. Range 3.0 to 11.0 or Not applicable (_) B. Strong Odor (_);describe

Li..id Flash Point: < 73F (X) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (_) Closed Cup (X) Open Cup (_)

CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

C..stituents	Range			Unit Description
NEOPENTYL GLYCOL POLYESTER RESIN	99	to	100	%
		to		
		to		
		to		
		to		
		to		

TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):

..ER: PCBs if yes, concentration ______ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_)
Radioactive (_) Benzene if yes, concentration ______ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_)
Carcinogen (_) Infectious (_) Other

..waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

..PPING INFORMATION

..KAGING: Bulk Solid (_) Bulk Liquid (_) Drum (X) Type/Size: 55 GALLON DRUM Other

..ICIPATED ANNUAL VOLUME: 1 Units: 55 GALLON DRUM Shipping Frequency: ONE TIME

..G INFORMATION

..mple source (drum, lagoon, pond, tank, vat, etc.):

Date Sampled: Sampler's Name/Company:

..nerator's Agent Supervising Sampling: 17. (_) No sample required (See instructions.)

..ERATOR'S CERTIFICATION

..by certify that all information submitted in this and all attached documents contains true and accurate descriptions of ..ste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All ..formation regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize ..in a sample from any waste shipment for purposes of recertification.

..re on original profile BJ4057 Daniel Hinds for TRICO Industries 1/4/94

Signature Name and Title Date

P nted 12/30/93 -

DEN BJ4057

Profile #

his is a Nonwastewater.

his waste is subject to any California list restrictions enter the letter from below (either A, B.1 or B.2) next to triction that is applicable:

___ HOCs, ___ PCBs, ___ Acid, ___ Metals, ___ Cyanides

tify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste er, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and ..43).

US EPA HAZARDOUS WASTE CODE(S)	B. SUBCATEGORY Enter the subcategory description. If not applicable, simply check none	C. APPLICABLE TREATMENT STANDARDS			D. HOW MUST THE WASTE BE MANAGED? Enter letter from below
		PERFORMANCE-BASED: Check as applicable		SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s)	
	DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42	
D001	IGNITIBLE LIQ, TOC >= 10%				INCIN FSUBS ORGS	A

Management under the land disposal restrictions:

RESTRICTED WASTE REQUIRES TREATMENT

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

RESTRICTED WASTE SUBJECT TO A VARIANCE

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

E. NOT CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

this waste a soil and/or debris? No: X Yes, Soil: _ Yes, Debris: _ Yes, Both: _

Specific Gravity Range: .700 to 1.300

dicate the range of each: Units

Cyanides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

anides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

des: _ None to _____ _____ Type _____

nal enolics: _ 0 to 10000 PPM

ntify the waste color VARIES , DOT physical state _____ ,

physical appearance _____

25. COMPLETE ONLY FOR WASTES INTENDED FOR UELS OR INCINERATION

TOTAL

Ber lium as Be ______ ppm

Potassium as K ______ ppm

Sc m as Na ______ ppm

Bromine as Br ______ %

Chl--ine as Cl ______ %

Fl ine as F ______ %

Sulfur as S ______ %

26. RECLAMATION, FUELS or INCINERATION PARAMETERS (Provide if information is available)

RANGE

A. Heat Value (Btu/lb): ____-____

B. Water: ______

C. Viscosity (cps): ____@____F _ 100 F _ 150 F

D. Ash: _____ %

E. Settleable solids: _____ %

F. Vapor Pressure @ STP (mm/Hg): ____

G. Is this waste a pumpable liquid? Yes _ No _

H. Can this waste be heated to improve flow? Yes _ No _

I. Is this waste soluble in water? Yes _ No _

J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _

TRANSPORTATION INFORMATION

A. s this a DOT Hazardous Material? Yes X No _

B. Proper Shipping Name. . . . .: RQ, WASTE RESIN SOLUTION (D001)

and Additional Description if required: ______

C. DOT Regulations: United Nations Hazard Class: 3 Flammable liquid I.D. UN1866 Packing Group: II

D. CERCLA Reportable Quantity (RQ) and units (lb, Kg): 10 lb

E. on-Bulk code ___ Bulk code ___

F. Special Provisions ___ ___ ___ ___ ___ ___

G. abels Required ______ ______ ______

SPECIAL HANDLING INFORMATION

S! B10, B11, B12, C60.

_ Material Safety Data Sheets Attached

HER INFORMATION

I HEREBY AUTHORIZE CWM TO OBTAIN A REPRESENTATIVE SAMPLE FROM MY SHIPMENT FOR THE PURPOSE OF P FILE APPROVAL FINALIZATION.

CH AL WASTE MANAGEMENT CERTIFICATION

C ical Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

nted 12/30/93

DEN BJ4057

Profile #

...ER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

	TCLP Information: Check only ONE for each constituent. Use units: ppm, mg/l				TCLP Data	TCA or TOTAL Use units: ppm, mg/l, mg/kg or percent			
						California List			
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual	Less Than	Regulated Level	Equal or More	Actual
...c as As	X	5.0 mg/l		D004			500 mg/l		
...ium as Ba	X	100.0 mg/l		D005					
...m as Cd	X	1.0 mg/l		D006			100 mg/l		
...ium tot Cr	X	5.0 mg/l		D007					
...ad as Pb	X	5.0 mg/l		D008			500 mg/l		
...y as Hg	X	.2 mg/l		D009			20 mg/l		
...enium as Se	X	1.0 mg/l		D010			100 mg/l		
...r as Ag	X	5.0 mg/l		D011					
...ium as Ni							[illegible]		
...ium as Tl							130 mg/l		
...ium Hex							500 mg/l		
...ntimony									
...lium									
...opper									
...)									
...ad									

(ER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

RG.	TCLP Information: Check only ONE for each constituent: Less Than	Regulated Level	Equal or More	Waste No.	TCLP Data: TCLP Analytical Test Results Use units: ppm or mg/l	TCA or TOTAL Use units: ppm, mg/l or %
Benzene	X	0.5 mg/l		D018		
rbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0.03 mg/l		D020		
lorobenzene	X	100.0 mg/l		D021		
loroform	X	6.0 mg/l		D022		
m-Cresol	X	200 mg/l		D024		
-Cresol	X	200.0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
resol	X	200.0 mg/l		D026		
2,4-D	X	10.0 mg/l		D016		
1,4 Dichlorobenzene	X	7.5 mg/l		D027		
1,2-Dichloroethane	X	0.5 mg/l		D028		
1,1-Dichloroethylene	X	0.7 mg/l		D029		
2,4-Dinitrotoluene	X	0.13 mg/l		D030		
Endrin	X	.02 mg/l		D012		
achlor, & Hydroxide	X	0.008 mg/l		D031		
Hexachloro-1,3 Butadiene	X	0.5 mg/l		D033		
Hexachlorobenzene	X	0.13 mg/l		D032		
Hexachloroethane	X	3.0 mg/l		D034		
Lindane	X	0.4 mg/l		D013		
Methoxychlor	X	10.0 mg/l		D014		
Methyl Ethyl Ketone		200.0 mg/l	X	D035		
Nitrobenzene	X	2.0 mg/l		D036		
Pentachlorophenol	X	100.0 mg/l		D037		
Pyridine	X	5.0 mg/l		D038		
Tetrachloroethylene	X	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2,4,5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		D040		
2,4,5-Trichlorophenol	X	400.0 mg/l		D041		
2,4,6-Trichlorophenol	X	2.0 mg/l		D042		
Vinyl Chloride	X	0.2 mg/l		D043		
)						

DEN BJ4057

Profile #

rinted 12/30/93

LLANEOUS PROFILE FIELDS

Region Lab: ___
rofile No.: DEN11
es Office. . . : DEN
Location Orig.: DEN
ile Expires . : 12/30/95
Approved. . . . . : 12/30/93
Signed Profile Present: Y Change Pending: _ Waste Status: A
Site (DCS) Status: A WPS RECEIVED, NO SAMPLE
P . Tracking No: _____

Flash Approval.: _
Pumpable Liquid Exact: ___ % OR Range: ___ - ___ %
Type of Pump. .: _____
Additional Anticipated Vol: _____ Per: _ Unit Code/Des: ___ _____

Handling Codes: __ _____ __ _____
__ _____ __ _____
__ _____ __ _____

Data: Status Code: C Tax Code. .: _
Permit No: _____ Expr. Date.: _____ Volume. . .: _____
Certificate of Destruction or Disposal Required ? _ Project # : ____
Properties: Inhalation: _ Dermal: _ Oral: _ Flammable: _ Health: _

Percent Taxable: ____ No. of Labels. . .: __
Transship Dest .: ___ Download Generator: 1190240
Material Class.: _ DCS Generator #...: 9999999999
Treatment Codes: S01 T03 T47 __ ___ ___
Process Codes .: ___ ___ ___ ___ ___ ___ ___ ___ ___ ___
Schedule Category : ___
Schedule Interval : _____
Listed Solvent Waste: _ Hal. Org. Compounds.: _ RCRA Reactive. . . .: _
Ecologic. . . . . .: _ Water Reactive . . .: _ Pesticide Mfg. Waste: _
Ignition Screen : ___ Gas Evolution : ___ Wet Zone . . . . . .: _
Self-heating cube sz ____ Vapor Concentration _____ Boiling Point F ___
Is Gas Ignitable? _ Corrosive to Steel or Aluminum _ Organic Peroxide _
Chemical Family Name _____

GENERATOR FROM PAGE 1

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
CO INDUSTRIES	NMD108381559	G	-	___	_____	-

ITIONAL BUSINESSES

Business Name	USEPA ID	Rltn	Contract in Place	at	Expires on	Evergreen Contract
M-ROCKY MOUNTAIN	N/A	I	-	___	_____	-

ITIONAL PROFILE COMMENTS

Cat	Comment	Cat	Comment
SC	Contains Ozone Depleting Substance,	PSC	container must be properly marked
	to comply with 40CFR 82.106		

PLEMENTAL FIELDS

Field	Value

Date Printed 12/30/93

Profile Change History

DEN BJ4057

Profile #

This section lists comments describing changes made to the profile.

Profile Change Comments	Date	User
This profile has no recorded changes.		

ATTACHMENT F

Laboratory Results from Verification and Backfill Samples

REPORT — Work Order # 93-12-024

Received: 12/02/93

Results by Sample

SAMPLE ID TIVS1 FRACTION 02A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 08:40:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	5.4	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST ___

Received: 12/02/93 Results by Sample

SAMPLE ID TIVS3 FRACTION 03A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 08:45:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	253	5.0	2.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 ... 3332 Wedgewood, Suite E-5 • F ..., Texas 79925

 REPORT Work Order # 93-12-024

Received: 12/02/93 Results by Sample

SAMPLE ID TIVS4 FRACTION 04A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 08:50:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	49.2	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

Received: 12/02/93 Results by Sample

SAMPLE ID TIVS5 FRACTION 05A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 08:55:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	8.7	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

Received: 12/02/93 Results by Sample

SAMPLE ID TIBS1 FRACTION 06A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 09:00:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	7.6	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

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REPORT

Work Order # 93-12-024

Received: 12/02/93

Results by Sample

SAMPLE ID TIBS2 FRACTION 07A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 12:15:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	5.9	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

Received: 12/02/93 Results by Sample

SAMPLE ID TIVS6 FRACTION 08A TEST CODE STRPH NAME TRPH/EPA 418.1

Date & Time Collected 12/01/93 13:55:00 Category SOIL

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	6.4	5.0	1.0	12/10/93

Notes and Definitions for this Report:

EXTRACTED 12/09/93
ANALYST DS
UNITS mg/Kg
BATCH_ID STRPH-135
PRCNT_MOIST

APPENDIX A

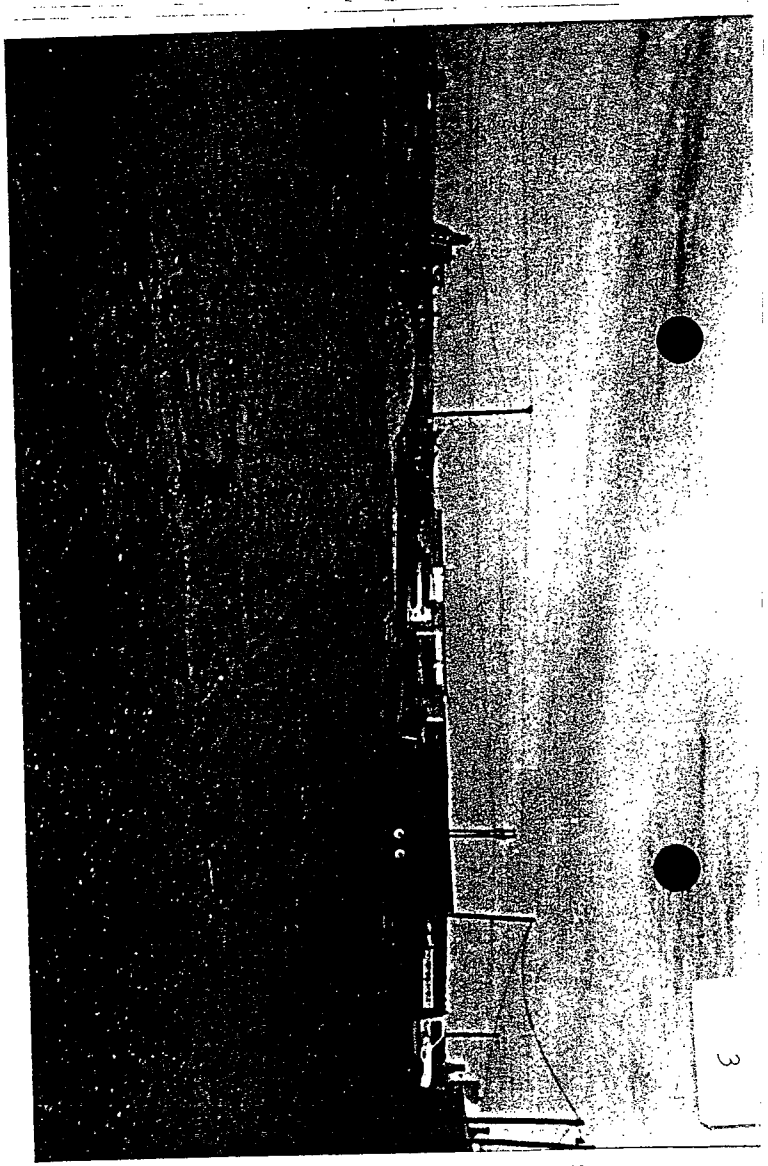
Photograph Log

SITE PHOTOGRAPH LOG

PHOTO NO.	DESCRIPTION
1	Looking ENE at scrap metal roll-off bin and building.
2	Looking NE, panorama of yard.
3	Looking N, panorama of yard.
4	Looking NW, panorama of yard; backhoe going to soil-stained areas at NE area of main building.
5	Drum Area 5, affected soil removed.
6	Excavation of Drum Area 5; total depth of 3 feet below ground surface (bgs).
7	Looking NE at debris pile.
8	Excavation at Drum Area 3; total depth of 4 feet bgs.
9	Trico crew loading scrap metal.
10	Looking ESE at large soil-stained area; excavation at Drum Area 3 in foreground.
11	Excavation at Drum Area 1.
12	Looking west at Drum Area 2.
13	Loading affected soil into TAD Trucking trailers for transport to Controlled Recovery, Inc. facility.
14	Loading affected soil into TAB Trucking trailers for transport to Controlled Recovery, Inc. facility.
15	Loading affected soil with backhoe.
16	Loading debris pile in NE corner of property.
17	Loading trash pile into end dumps for transportation to landfill.
18	View of debris pile while loading with backhoe.

1

2



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4

5
NASA

9

7

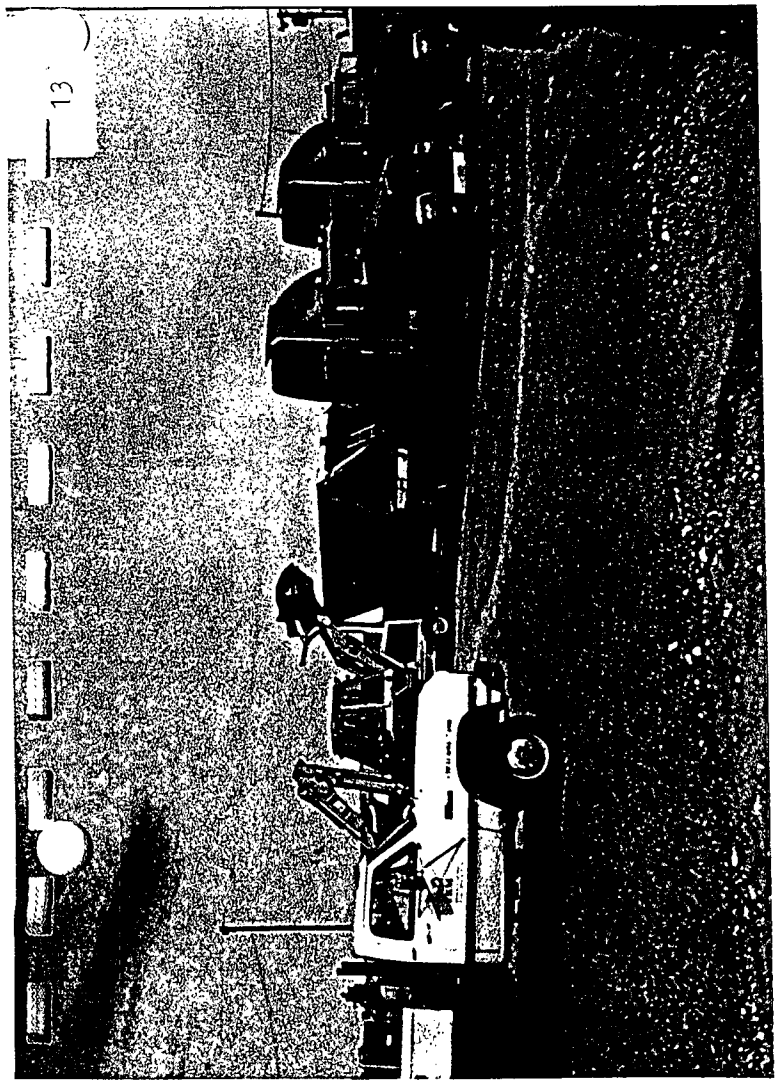
8

12

10

11

15



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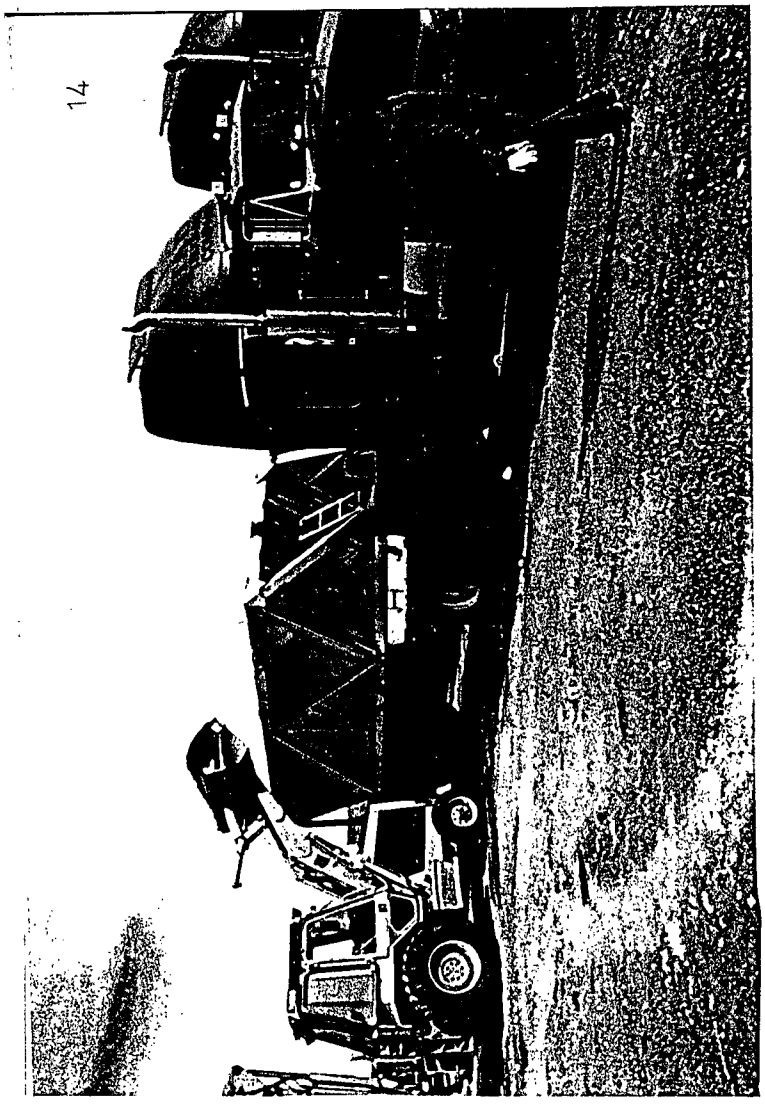

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16


17

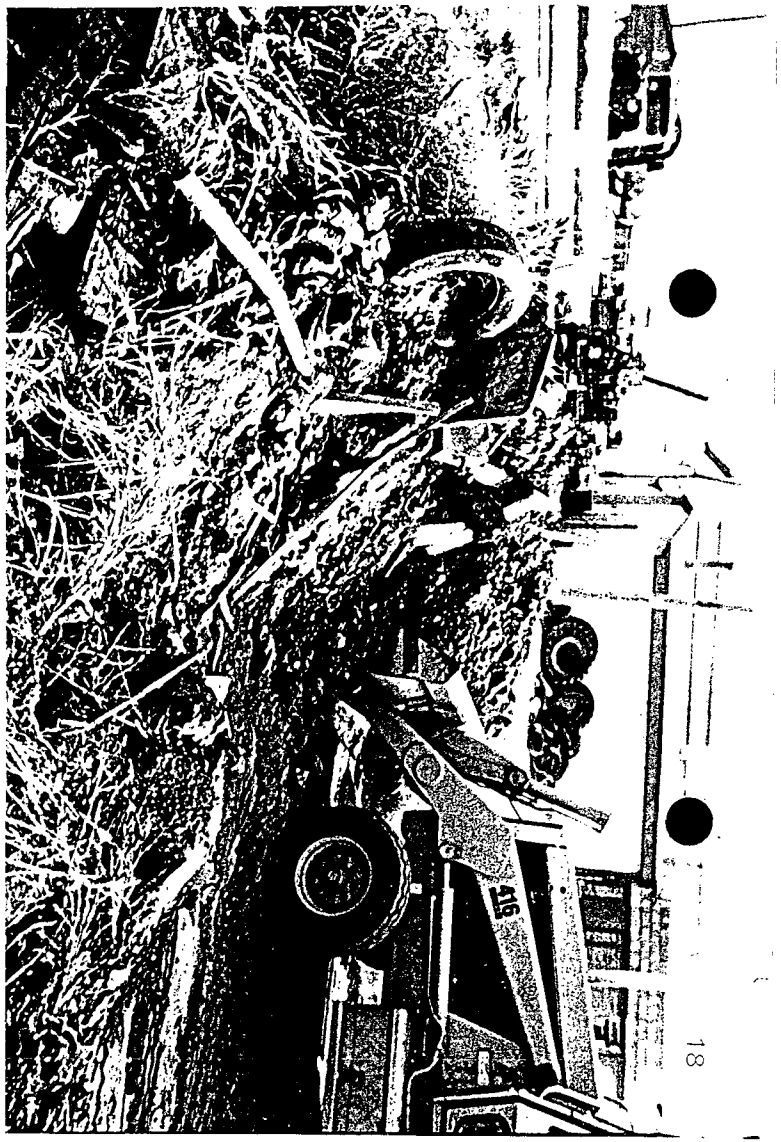
416
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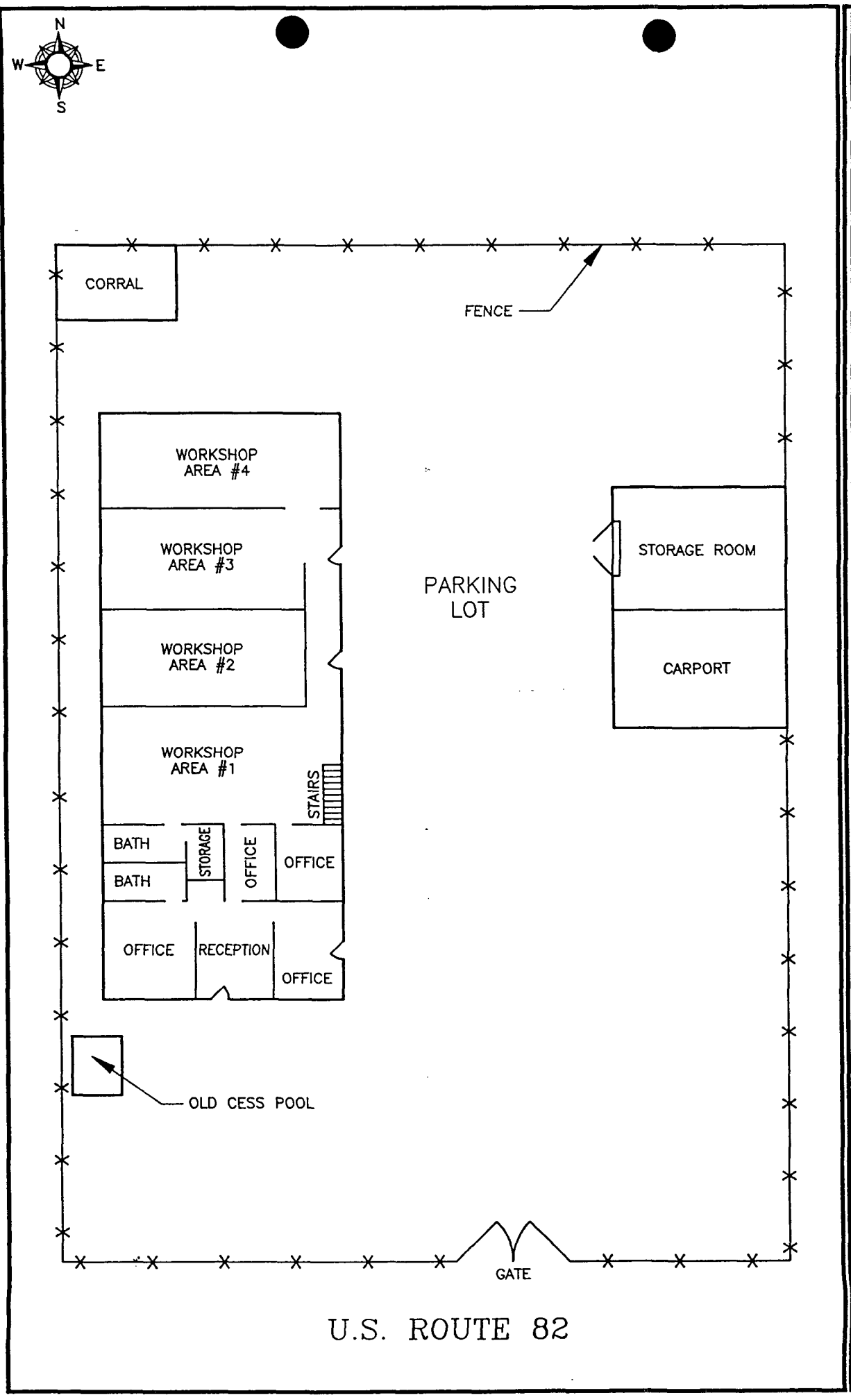
FIGURE 1

Site Plan



ERM EnviroClean–Rocky Mountain, Inc.
5950 South Willow Drive
Suite 206
Greenwood Village, Colorado 80111
(303) 694-7390
ERM

TRICO INDUSTRIES, INC. / 11376 LOVINGTON HIGHWAY
ARTESIA, NEW MEXICO

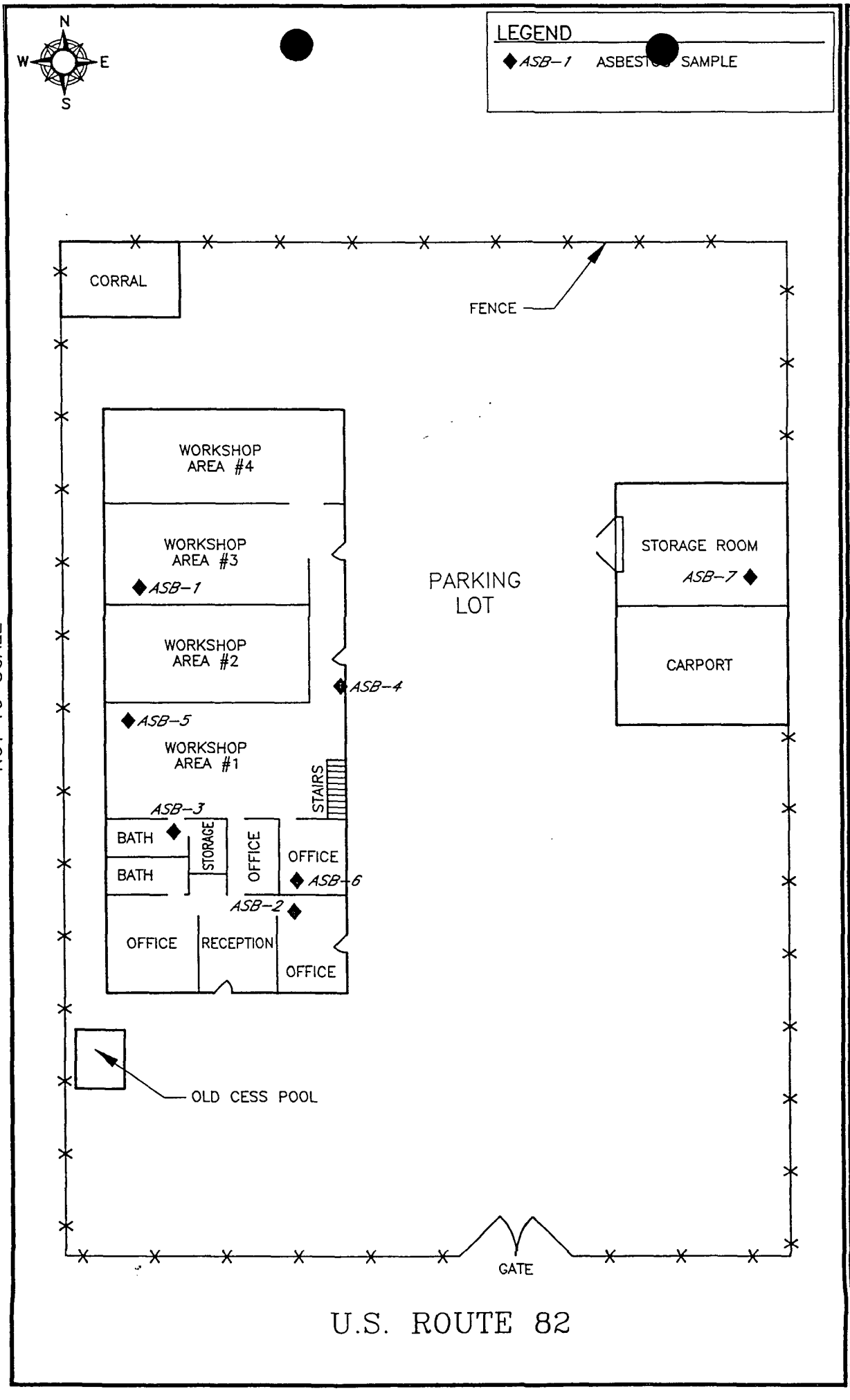
SITE PLAN

DESIGNED	PMB
DRAWN	KAS
CHECKED	
DATE	01/18/94
JOB NO	ENMR930017.0
FILENAME	FIG-1

FIGURE 1

FIGURE 2

Asbestos Sample Locations



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Greenwood Village, Colorado 80111
(303) 694–7390

ERM

TRICO INDUSTRIES, INC. / 11376 LOVINGTON HIGHWAY
ARTESIA, NEW MEXICO

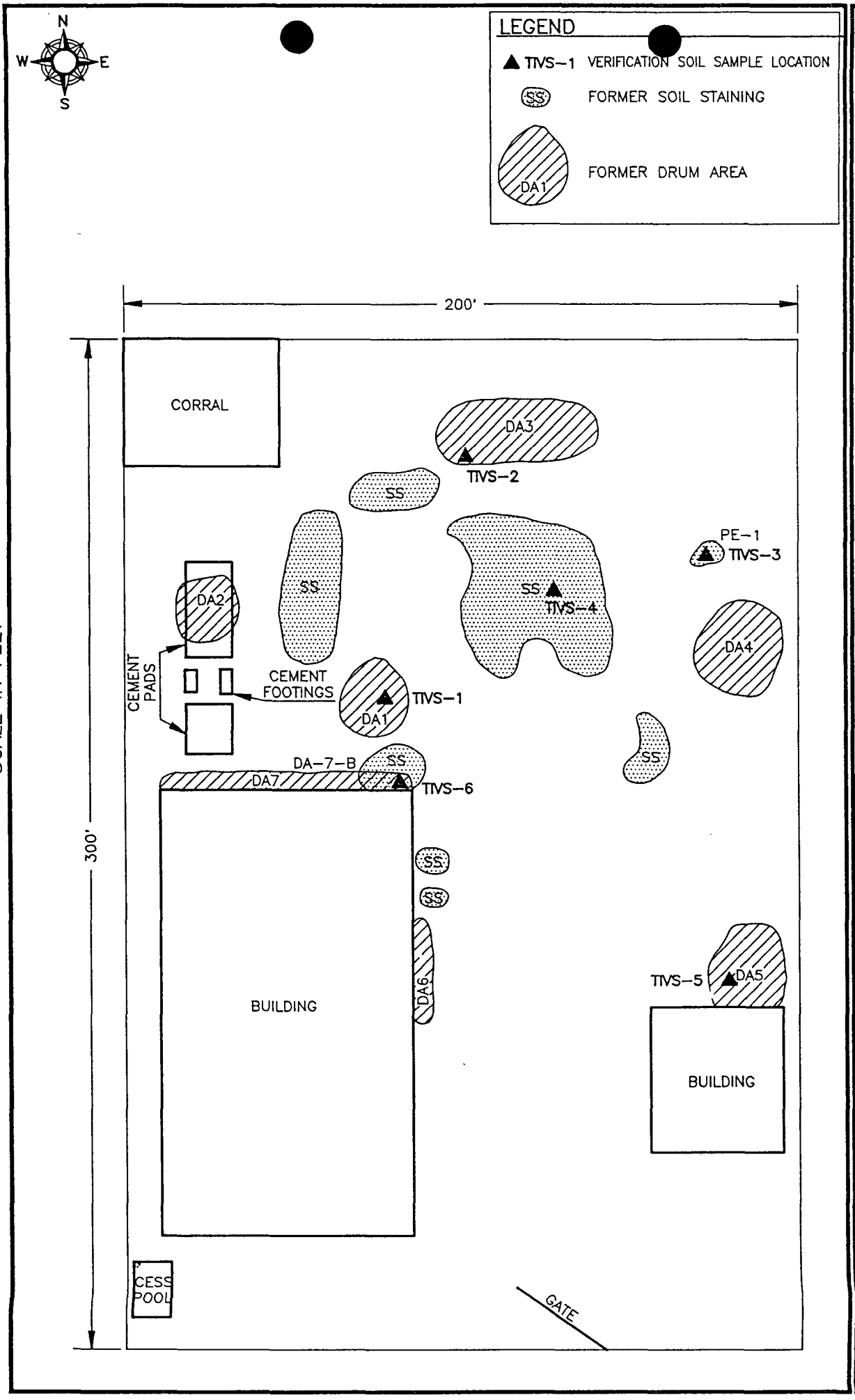
ASBESTOS SAMPLE LOCATIONS

DESIGNED	PMB
DRAWN	KAS
CHECKED	
DATE	01/18/94
JOB NO	ENMR930017.0
FILENAME	FIG–2

FIGURE 2

FIGURE 3

Verification Sample Locations



SCALE IN FEET

0 40 80

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Suite 206
Greenwood Village, Colorado 80111
(303) 694-7390

ERM

TRICO INDUSTRIES, INC / 11376 LOVINGTON HIGHWAY
ARTESIA, NEW MEXICO

SITE LAYOUT DIAGRAM & VERIFICATION SAMPLING LOCATIONS

DESIGNED	PMB
DRAWN	SRL
CHECKED	
DATE	01/18/94
JOB NO	ENMR930017.0
FILENAME	FIG-3

FIGURE 3

TABLE 1

Asbestos Sample Results

TABLE 1

ASBESTOS SAMPLE RESULTS

Sample ID	Sample Location	Sample Description	Analytical Results
ASB 1	Hole present in ceiling of workshop Area #3.	Blown-in Insulation	0%
ASB 2	Ceiling of office in SE corner of Bldg.	Spray-on Acoustic Ceiling Texture	0%
ASB 3	Bathroom off Workshop Area #1.	Floor Tile and Mastic	10-30% Chrysotile
ASB 4	Inside wall adjacent to door on east end of Workshop Area #3.	Interior Wallboard/Sheetrock	0%
ASB 5	Ceiling in NW corner of Workshop Area #1.	Drop-in Acoustic Ceiling Tile	0%
ASB 6	Office adjacent to Workshop Area #1.	Ceiling/Material/ Sheetrock	0%
ASB 7	Ceiling in storage area at north end of the small building.	Ceiling/Wallboard	0%

TABLE 2

Verification and Backfill Sample Results

TABLE 2

VERIFICATION SAMPLE RESULTS

Sample ID	Sample Location and Description - Refer to Figure 3	Analytical Results TPH in PPM
TIVS 1	Soil sample collected from Drum Area 1 at a depth of 18 inches.	5.4 ppm
TIVS 2	Composite soil sample collected from Drum Area 3 at a depth of 4 feet.	149 ppm
TIVS 3	Soil sample collected from area previously identified as PE-1, at a depth of 4 feet.	253 ppm
TIVS 4	Composite soil sample from large area of soil staining in center of the north portion of the yard. At a depth of 1 foot.	49.2 ppm
TIVS 5	Soil sample from Drum Area 5 at a depth of 3 feet.	8.7 ppm
TIVS 6	Soil sample collected from stained soil area adjacent to NW corner of main site building.	6.4 ppm
TIBS 1	Soil sample of caliche backfill.	7.6 ppm
TIBS 2	Soil sample of caliche backfill.	5.9 ppm