



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Mr. Art Wright
Carlsbad Motor Company
P.O. Box 1509
Carlsbad, NM 88220

Dear Mr. Wright,

Thank you for the opportunity to walk through your facility, assess your compliance with the regulations and be able to provide pollution prevention ideas.

Enclosed is a survey that I would like filled out, and a stamped return address envelope. Please take a minute to complete this so that we may take whatever means necessary to give businesses the information and help they need.

Once again I appreciate being allowed to serve you. Should you have any questions you may contact me at my new telephone number 1-505-827-1512.

Sincerely,

A handwritten signature in cursive script that reads "Debby Brinkerhoff".

Debby Brinkerhoff
Environmental Specialist



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Hazardous Waste Consultation Report

I have read the explanation of the on-site technical assistance program and agree to participate in the program. I also agree to correct any and all violations of the Hazardous Waste Regulations (20NMAC 4.1) identified by the Hazardous and Radioactive Materials Bureau (HRMB), within the time period(s) agreed for each violation. I also certify that I am a responsible party (owner or manager) to the facility listed below.

A. J. Wright
 Signature

Service Manager
 Title

6-9-98
 Date

Facility _____

Facility Name: Carlsbad Motor Co. EPA #: NM0035717438

Facility Contact(s): _____

Title(s) Art Wright - Service Manager

Phone: 505-885-9101 Phone: _____

Address: 2802 W. Pierre

Mailing Address: PO Box 1509

City: Carlsbad Co.: _____ Zip: 88220

Notification Status (circle) CESQG (SQG) LQG TSD
 Transporter Recycler Other _____

NMED/HRMB
 Lead Contact: Dulley Bunkerhoff

Other Representatives: _____

Time On Site: 10:00 AM/PM Time Off Site: _____ AM/PM

Facility History & Nature _____

History & Nature of Business: Repair Vehicles

Facility Carlebad Motor Co. EPA# NMD 035717438

Conditions Not in Compliance

Condition	Location	Recommended Corrective Action	Due Date
1. Hazardous Waste Generator has have not been paid - figure out back account	Entire Facility	Review waste disposal records only appropriate fees	8/9 1998
2. Used Oil tank is not labeled - used oil	Behind facility	Label tank used or waste oil	8/9 1998
3. Waste antifrize barrels - open & not labeled Open antifrize containers	Behind facility in ground	Label antifrize barrels w/ hazardous waste labels & start accumulation date	8/9 1998
4. Waste paint cans being put in dumpster.	Inside Shop	Waste paint cans w/ more than 1/2 inch paint in can must be disposed as haz waste	8/9 1998
5.			

Pollution Prevention & Waste Minimization Suggestions, Technical Assistance Referrals

- Solvent Parts Washers lids open - pumps running - should have lids down - pumps off when not using - reduced evaporation keeps solvent clean longer & reduces your cost.

- Carlebad Motors is a Small Quantity Generator - between 220-2,200 lbs per month haz waste generated. By reducing # of parts washers & replacement with the aqueous hot water & soap parts washer & filtered solvent parts washers - should be easy to become a Conditionally Exempt Small Quantity generator - less than 220 lbs haz waste generated per month. No fees are owed by CECQG's.

- Aerosol brake cleaner cans must be completely empty before being put in dumpster. If top becomes clogged or broken return to vendor for product reclamation. Brake cleaner is a hazardous waste.

Questions, Concerns, Comments

- Lead solder drips must be collected & disposed as hazardous waste.

- If Carlebad Motors remains a Small Quantity Generator - antifrize storage area must be upgraded to conform with hazardous waste storage requirements - restricted access, fire extinguishers, emergency communications device, containment area - etc - see EPA booklet.

Facility Carlsbad Motor Co. EPA# NMD 035717438

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Parts Washing <i>manifest + LORLs - yes</i>		<u>5</u> Solvent units, <u>no</u> Lids Closed, Collected by <u>Safety Kleen</u> <u> </u> Solvent filtering, filter disposed by <u>buying aqueous Parts Washer</u>	<u>D008, D039</u> <u>D006, D018</u> <u>D057, D049</u>	<u>27.83 g/month</u> <u>(219.86 lbs/month)</u> <u>will reduce solvent</u>
Used Oil		<u>no</u> UST(registered), Used oil Barrels labeled <u>no</u> & closed <u>yes</u> Collected by <u>Safety Kleen</u> Oil Filters Drained <u>yes</u> Crushed <u>no</u> to dumpster		<u>167 gal every</u> <u>2 month.</u>
Antifreeze <i>open container on ground</i>		<u>yes</u> recycled, <u> </u> disposed by who <u>Safety Kleen</u> 3 barrels <u> </u> Tested for TCLP, results <u> </u> <i>open - not labeled</i>		<u>15.83 g/month</u> <u>(112.47 lbs/mo)</u>
Refrigerant		<u>4</u> licensed to manage refrigerant <u>X</u> recycling R12, <u>X</u> recycling R-134		<u> </u>
Batteries		<u>yes</u> Recycled, <u>yes</u> stored properly (not stacked, no leaks) <i>motorcraft interstate</i>		<u>30/month</u>
Paint & Lacquer Thinner		<u>yes</u> waste paint stored & labeled, waste paint collected <i>deposited in dumpster</i> <u> </u> <i>closed metal container</i> by <u> </u> , solvent bearing rags managed as haz waste <u>G K Services</u>		<u> </u>
Brakes		<u> </u> Dry fully encapsulated or <u>X</u> Wet method <u>aqueous Parts Washer</u> <u> </u> Solvent is caught in drip pan and managed properly <u>Serviced by Safety Kleen</u>		<u> </u>
Radiators <i>Do some electrical lead soldering</i>		<u> </u> Lead /zinc solder waste managed properly. <u> </u> Sludge from tanks managed properly (dewatered first)		<u> </u>
Aerosol Cans & Carburator Cleaner <u>5 gal. can - (1)</u>	<u>Aerosol Brake Clean</u>	Aerosol and/or carburator cleaner with more than 10% by weight of any of the following: <u> </u> Carbon Tetrachloride <u> </u> Chlorobenzene <u> </u> Methyl ethyl ketone <u> </u> Trichloroethylene <u> </u> zylene <u> </u> CFC's <u> </u> methylene chloride <u> </u> Tetrachloroethylene (perc) <u>X</u> toluene <u> </u> 1,1,1-trichloroethane - Managed as hazardous waste <u>Safety Kleen</u>		<u> </u>
Wastewater, Sludge & Waste Fuel		<i>purchase using</i> <u>Hot soap washer</u> <u>NO</u> Sand Trap(s), cleaned by <u>water degreaser</u> <u> </u> Oil water separator, cleaned by <u>use floor absorbent</u>		<u> </u>
Tires & Scrap Parts		<u>no</u> over 500 ²⁵⁰ waste tires stored on site (need to follow tire regs) <u>yes</u> scrap metal sold, <u>yes</u> aluminum cans recycled, <u> </u> paper recycled, other: <u> </u>		<u> </u>

Car Wash - wash exterior of vehicles only

B3

Facility CARLSBAD MOTOR Co.

EPA# NMDC03571738



Corrective Actions Notification

Corrective action or a plan of corrective action must be submitted within thirty (30) days from the date of this on-site visit. Please describe the actions taken to correct the conditions identified. Sign and return the original, include all documentation and photos necessary to support correction within the delineated times noted.

From the initial site visit date, the participant will receive amnesty from regularly scheduled compliance inspections for the period of six months. This amnesty does not include complaint investigation, on-going enforcement action, immediate or imminent threat to human health or the environment, or failure to take corrective action on the conditions by the agreed deadline.

Condition Number	Corrective Action Taken By Facility	Date Completed
1	REVIEWED WASTE DISPOSAL RECORDS & MAILED COMPLETED NOTIFICATION FORM & FEE SCHEDULE ALONG W/APPROPRIATE FEES	7/98
2	PAINTED "USED OIL" ON TANK IN LARGE BLACK LETTERS & INSTALLED YELLOW & BLACK USED OIL LABELS	7/98
3	REPLACED BARRELS W/ SINGLE 165 GAL POLY CONTAINER W/ SAFETY KLEEN LABELING ATTACHED. ORDERED & ATTACHED HAZARDOUS WASTE LABELS ALSO	8-12-98
4	INSTRUCTED DETAIL TECHNICIAN THAT USED PAINT MUST BE MIXED & USED AS TOUCHUP PAINT. DO NOT DISPOSE OF PAINT CANS IN DUMPSTER. ARRANGE TO HAVE PAINT CANS REMOVED & DISPOSED OF BY SAFETY KLEEN IF NECESSARY TO DISPOSE PAINT CANS.	7/98

A.J. Wright
Signature
File:forms\consultf.ora

SERVICE MANAGER
Title

8-21-98
Date



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EDGAR T. THORNTON, III
DEPUTY SECRETARY

June 25, 1998

Loran Creech
Carlsbad Motor Company
2802 W. Pierce
Carlsbad, New Mexico 88220

Dear Mr. Creech:

Thank you for returning your Annual Generator Hazardous Waste Fee Schedule. According to our records, your EPA Notification of Regulated Waste Activity Form (8700-12), indicates your files has not been updated since 1989. Therefore, we are requesting a subsequent notification for our records. New data has been added to this form which may affect the status of your current facility.

You should call this office and request an 8700-12 form any time you have any major changes within your facility, and it will help us in keeping current records on file.

Enclosed you will find a copy of the EPA Notification (8700-12) form for you to complete and return. Should you desire to obtain the EPA Notification of Regulated Waste Activity Booklet, please contact me. Also, please remember to keep a copy for your files and return the original to this office for processing.

Should you have any questions or concerns, please contact this office at (505) 827-1558.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Cardenas".

Barbara Cardenas
Management Analyst
Administration & Special Projects