

Larry Wilson
Maintenance Mechanic Supervisor

Bandelier National Monument
HCR 1 Box 1 Suite 15
Los Alamos, NM 87544

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State of New Mexico
ENVIRONMENTAL DEPARTMENT

Hazardous Waste Bureau
1000 Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us

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RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

Inspection Report

Facility: Bandelier National Monument Location: 12 miles from Los Alamos NM & 8 miles from White Rock NM
EPA ID #: NM1141799923 Mailing Address: HCR 1 Box 1 Suite 15
Ownership: _____ Los Alamos, NM 87544
Authorized Agent: _____ Facility Contact: LARRY WILSON
Maintenance Mechanic Supervisor

Time of Entry 10:20 AM Date 6/29/05 Access Granted / Denied _____
Facility Representative _____ Title _____
Reason(s) for Denial of Access (if applicable) _____

Larry Wilson
Facility Representative Signature

Inspector Signature

Entry Conference:

- Present Credentials to Facility Representative
- Cite Statutory Authority to Enter Site (NMSA § 74-4-4.3)
- Cite Statutory Authority to Conduct Inspection, Obtain Samples and Take Photographs (NMSA § 74-4-4.3)
- Specify Reasons for, and Nature of the Inspection
- Specify Objectives and Procedures for Inspection
- Schedule Exit Conference

Participants:

Name	Signature	Title	Phone #
Robert Atencio	<u>Robert Atencio</u>	Environmental Inspector	(505) 428-2523
JANA Maestas	<u>JANA Maestas</u>	ENU. Spv.	(505) 428-2507
LARRY Wilson	<u>Larry Wilson</u>	Facilities Maintenance Supervisor	

This Compliance Evaluation Inspection (CEI)
was conducted based on:

EPA ID NM1141799923
Facility Name Bandelier Natl. Monument
Date _____

FY: 05 Grant Requirements Yes
Follow up to Previous CEI NO
Facility was Last Inspected on: N/A
Checklists Completed: CESQG, SQG, <90 Day, Transporter, LDR, Tanks, and Containers.

Citizen Complaint NO
Observation by Inspector ADJ

History, Size, and Nature of Business: The U.S. Forest Service initially administered Bandelier Monument from 1916 through 1932. The National Park Service assumed management of Bandelier National Monument in 1932. The size of Bandelier is 33,667 acres and the Park Service employs 30 people. The Mission of the Park Service is to preserve and perform archeological research and the nature of business of the Park Service is tourism.

Waste Streams Generated:

Waste Code	Description of Process	Location
—	<p>Used oil is generated from small equipment usage ~ 6 gallons/month. The used oil is recycled by Satty Klean. Park Service personnel service their vehicle fleet via G.S.A. which subcontract their vehicles @ Los Alamos repair shops.</p>	<p>Located @ the Oil house</p>

metCo @ Ply

Results of Inspection:

Performed an in-brief, physical inspection and phys-out-brief during this inspection. Inspectors reviewed their process of solid & hazardous waste generation and determined that their generating status is CESQG (Categorically Exempt Small Quantity Generator <220 lbs). The following potential violations were noted below:

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
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<p>1) Failure to properly ^{MANAGE} store ^{VOID} Universal Waste Fluorescent Lamps in a way that prevents releases into the Environment.</p>	<p>273.13(c)</p>
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<p>2) Failure to label or mark clearly with the words "Universal Waste Lamps," or "Waste Lamps," or "Used Lamps." for 7X 8 foot bulbs; 8X 6 foot bulbs and 4X 2 foot bulbs located ⁱⁿ at the Power House, (North end of the Maintenance) Building. Bulb also located @ the electrical Storage shed approximately 50X6 foot bulbs.</p>	<p>273.14(e)</p>
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EPA ID NM114799923
Facility Name Brudette Wall Park
Date 6/22/05

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
3) Failure to mark accumulation	Start date on containers, located at the power house high voltage building and at the electrical supply storage shed.	273.15(c)(1)
4) Failure to maintain an inventory system on-site that identifies the date each Universal Waste became a waste or was received	received	273.15(c)(3)
5) Failure to inform and train all employees who handled or have responsibility for managing Universal Waste (i.e., the information must describe proper handling & emergency procedures appropriate to the types of Universal Waste).		273.16

EPA ID NM 141799923
 Facility Name Sandwich Natl. Monument.
 Date 6/29/05

Waste Streams Generated:

Waste Code	Description of Process	Location
D008 & D002	Lead Acid batteries are recycled at Alamos Landfill recycling center. Approximately 4-5 batteries/year.	L.A. Landfill
—	Acrosol cans (i.e. Enamel Spray Color Spray cans) are disposed when empty, then disposed into dumpster. 12 dozen are disposed into trash on a yearly basis.	Ronch's tool shop.
	Three lined sewage lagoons receive waste water which is regulated by NMED Ground Water Bureau. The lagoons were installed w/ new lining last year.	South of Bone yard
—	Latex paint & cleaning solution & caulking are used for building maintenance.	Carpenter Shop
—	Ni-cad Batteries are recycled by _____ and approximately _____ are recycled.	Cant Newman Office

EPA ID NM1141799923
 Facility Name BANDEREA NHT MON.
 Date 6/29/05

Waste Streams Generated:

Waste Code	Description of Process	Location
—	<p>Welding Gas cylinders containing Oxygen & acetylene acetylene used for maintenance and tanks Cylinders are serviced by Glover from Los Alamos.</p>	Welding Shop
D009	<p>Used Fluorescent bulbs are stored & shipped out for recycling ^(via) which the recycling program ^{is} started.</p>	Bone Yard & Power house Building.
	<p>^{WERE} Herbicides utilized to control unwanted plant growth, however usage was terminated last year.</p>	White Rock Storage Area.
—	<p>Park Service generates Scrap Metal (i.e. ~ 100 lbs per year). Metal is recycled @ Los Alamos Land fill.</p>	Bone Yard

Compliance Evaluation Inspection, Better Business Practices

Facility Bandelier Natl. Monument EPA # NM114179923 DATE 6/29/05

Pollution Prevention & Waste Minimization Suggestions

- 7) Know the types of hazardous materials used and waste generated from your operations
- 8) Understand how you manage your waste, and how much it costs you.
- 9) Be aware of regulations that apply to you.
 - assign an employee to keep track
 - maintain all records for 3 yrs.
- 10) Train all your employees in
 - Health and Safety Protection
 - proper waste management methods
 - Pollution Prevention Methods

Questions, Concerns, Comments

Best Management Practices

- 1) Designate a central location for collection of Fluorescent Bulbs and Batteries
- 2) Label all 55-gallon drums ^{and other containers} whether it's product or waste with content information
- 3) Do not mix solvents with waste oils or coolant.
- 4) Keep containers covered and make sure they don't leak
- 5) Avoid spillage when filling containers.
- 6) Keep different waste types in different containers

Exit Conference:

EPA ID NM141799923
Facility Name Bandelier Natl. Monument
Date 6/29/05

Time of Exit: 5:00 pm.

Discussion/Explanation of Potential Violations

Explain Review Process by NMED/HWB Management

NMED Anticipated Timetable for Notice of Violation Letter

Explain Enforcement Policy and Procedures (incl. pos. penalties)

Explain Availability of On Site Technical Assistance

Participants:

Name	Signature	Title	Phone #
<u>Anna Maestas</u>	<u>[Signature]</u>	<u>Env. Spv.</u>	<u>428-2507</u>
<u>Robert Atencio</u>	<u>[Signature]</u>	<u>Env. Spec.</u>	<u>428-2523</u>
<u>LARRY WILSON</u>	<u>[Signature]</u>	<u>Facilities Maintenance Supervisor</u>	

I have been advised that at the time of inspection, no potential violations of 20 NMAC 4.1 were identified. I also understand that I remain obligated to comply with all applicable laws and regulations.

I have been advised of the potential violations identified during the inspection. I understand that in accordance with §74-4-10 NMSA 1978 (Repl. Pamp. 2000), NMED may: (1) issue a notice of violation requesting voluntary compliance within a specified time period; (2) issue a compliance order requiring compliance immediately or within a specified time period or assessing a civil penalty for any past or current violations of up to \$10,000 per day of noncompliance with each violation or both; or (3) commence a civil action in district court for appropriate relief, including a temporary or permanent injunction. Any such order issued may include a suspension or revocation of any permit issued by NMED.

[Signature]
Facility Representative

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
Bandelier National Monument
HCR 1 Box 1 Suite 15
Los Alamos, New Mexico 87544-9701

RECIPIENT: Robert Atencio

OFFICE: Hazard Waste Bureau

SENDER: LARRY WILSON

DATE: 7/11/05 # PAGES INCLUDING COVER SHEET: 1

TELEPHONE: (505) 672 - 3861 EXTENSION 520

FAX: (505) 672-4018

COMMENTS:

Requested Training INFO on Fluorescent Lights

**Group Training Record
Bandelier National Monument**

Title of training: **Used Fluorescent Lamp Handling and Storage**

Date(s) of training: 6/30/05 Number of hrs. .5

Instructor's name and title or company: **Larry Wilson --- National Park Service**

Brief description of what topics were included in the training (an agenda may be attached to provide a summary): **After Removing used fluorescent lamps from light fixture record date on lamp place in carton and re-seal, each carton will be numbered and dated on the out side, record carton number and date on each lamp in log book which will be in same central storage location as lamps (Mesa electrical storage building) and insure that the lamps are processed within 1 year of recorded Dates.**

Participants who completed the training

Shawn Baker Ken Short Richard Gibbs Tori Iverson Stan Meyer
Renado Almanzar Darryl Martinez Vito Spina Lauryl Mack
Dale Leslie

Please submit completed form to Bandelier Human Resources Office.

Form completed by: Maintenance Supervisor [Signature]