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**PRO-KEM
INSPECTION REPORT**

Date of Report: December 8, 1992
Date of Inspection: November 18, 1992
Facility: Pro-Kem
EPA ID Number: Non-Notifier
Ownership: Private
Location: 2400 South Main, Lovington N.M.
Mailing Address: P.O. Box 1506, Lovington N.M. 88260
Facility Contact: Gerald Phillips, Owner
Enforcement to: Gerald Phillips, Owner
Notification Status: Non-Notifier
Current Operating Status: Non-Handler
Type of Inspection: Complaint Investigation
Participants: Pro-Kem: Gerald Phillips, Mngr.
NMED: Coby Muckelroy
Michael Le Scouarnec
Weather: Cloudy, light rain, 60's
Time of Entry: 11:45 a.m.
Time of Exit: 2:30 p.m.

INTRODUCTION

This inspection was conducted as a Compliance Evaluation Inspection (CEI) in response to a complaint. The complainer is the owner of a property that Pro-Kem is actually leasing from. The nature of the complaint is related to a Pro-Kem's chemical leak and its remediation, that happened on the leased property. This inspection was conducted in addition to the FY 93 grant agreement. Mr. Muckelroy, accompanied by Mr. Le Scouarnec, lead the inspection. Based on a file review, this facility has never been inspected by the Hazardous Waste Program.

HISTORY AND NATURE OF BUSINESS

This facility retails oilfield chemical sales and service. The company exists since 1986. Pro-Kem used to be located at the adjacent estate, 2330 South Main, for a total of 6 years. The facility moved to 2400 South Main in July, '92; and is still leasing the property at 2330 South Main until December 31, 1992. Pro-Kem's manager, Mr. Phillips found out that an underground chemical leak occurred prior to July '92.

A 10,000 gallon tank containing naphtha leaked thru underground pipes connecting the tank to the building, (see map & pictures 1 to 7). The leak does not totalize the tank capacity. The leak remained unnoticed for a certain period of time. When Pro-Kem purchased the present location (2400 South Main) and moved everything in July '92, Mr. Phillips contracted Jerry Barnard of Bio Remediation to bioremediate small spills and spots.

According to Mr. Phillips: (see letter in appendix), none of the leaks amounted to more than 3 or 4 gallons and most were smaller than that. The reason for the bioremediation was the clean up of small spills and spots that occurred during a period of time of 6 years, including a place where the diesel fuel tank had leaked, and the place where the treating trucks had leaked corrosion inhibitor. The remediation started in August '92, the contractor removed 1 to 2 inches of the contaminated surfaces; then the material was stored in a drum for analysis. The yard included one 10,000 gallon tank of naphtha, one 2000 gallon tank of methanol, and one 800 gallon tank plus four 400 gallon tanks of chemical products. Additionally some drums containing products sat on pallets along the fence. Once all these tanks and containers were moved out; Mr. Phillips contracted Ray Hardy of Pinion Water Well Service to remove the underground pipes connecting the former tanks to the building.

As the latest contractor dug the trench, he noticed a strong odor coming out of the ditch, and informed Mr. Phillips of that. Two days later, Mr. Phillips went back to inspect the backfilled ditch and detected the odor of naphtha. A leak definitively occurred at about 60 feet from the building. The cause of the leak is attributed to thread damages. Jerry Barnard of Bioremediation came back to test the area; as well as Ray Hardy to reopen the ditch, and to dig out a plastic line that was deeper than the steel line. On August 20th, the ditch was opened from end to end, and the City of Lovington came on site to inspect the situation. Mr. Phillips and the city delegate removed a small sample of the most contaminated soil, and put a flame to it to see if it would burn. It would not burn.

On August 26, Lovington's City Manager, Mr. Bob Carter contacted Mr. Phillips that the city will have the ditch sample by Cardinal Laboratories for BTEX.

According to Mr. Barnard: Two samples were taken from the top of piles of soil beside the ditch, and a composite sample was also taken at various intervals in a span of 60 feet. Cardinal Laboratories conducted analysis method # 8020. During the split session, Mr. Barnard has been instructed by the Cardinal representative on how to take samples.

According to Mr. Phillips: Based on the quantity of contaminated soil removed, the naphtha leak did not exceed more than 30 gallons. On September 18, Jerry Barnard took a composite sample taken at 3 points along the backfilled ditch. The splits were sent immediately to Cardinal Laboratories. Meanwhile, Mr. Phillips scraped the dried material on surface of the yard; his concerns regarding the hazardous nature of the contaminated soil, made him call HRMB.

Following the yard inspection, we inspected the building. No violations were noted in the building. After our inspection at 2330 South Main, the inspectors went next door, at 2400 South Main, where Pro-Kem Inc. moved their installations. There are 8 employees working at Pro-Kem, one blender Mixer, two truck drivers, three salesmen, and two secretaries.

WASTE STREAMS GENERATED AND HAZARDOUS WASTE MANAGEMENT AREAS

The facility basically generates any hazardous waste. The only waste is the wash-part solvent. The 20 gallon naphtha unit is picked up every other month by Safety-Kleen. Expired chemicals are blended into batches. A contractor takes care of the empty drums that are no longer usable (pinhole leaks, and bent ones).

Solid waste generation consists of Safety-Kleen absorbent (3391) to clean spottage, trashed wood pallets, and office trash.

RESULTS OF INSPECTION

Coby Muckelroy and Michael Le Scouarnec conducted an inbrief with Mr. Gerald Phillips, Pro-Kem's manager. We conducted the physical inspection followed by a documentation review and the outbrief conference.

The physical started in the yard of Pro-Kem's former location, (2330 South Main). The ground exhibited signs of contamination along the trench in which the pipelines were contained, and signs of possible contamination in the area where the tanks were located, (see pict. 1 to 7, and maps in appendix). Mr. Phillips told us that the water table is about 120 feet below surface. Also, that bioremediation consisted of tilling the soil and applying bacteria and fertilizer for about 2 months. The building formerly used for blending did not show signs of contamination. The drain system is self contained, it does not discharge. Mr. Phillips accompanied by the inspectors went back to the facility's present location, (2400 South Main).

The facility mixes different chemicals products with naphtha with the help of 3 vats, (see pict. 8) to form emulsion breakers, paraffin dispersants, surfactants (hydroxy acetic acid), scale inhibitors (salt of phosphoric acid), corrosion inhibitors, and other chemical used in blends such as methanol (winterizing), alcohols, potassium hydroxide, and amine bases. Oxygen scavenger is bought and sold as it is. The expired chemicals are blended into batches, as well rinses from vat blendings. The 20 gallon Safety-Kleen wash-part unit is recycled every 2 months. In the yard, one can see the tanks of product in the bermed area, (see pict. 9,10,11). We then inspected the former washbay for trucks and mobile equipments. This area is presently used to store cleaned drums. No violations were noted during the physical inspection.

Sample analysis of the contaminated area were the only documents available for review during the inspection.

The outbrief conference was conducted by Mr. Muckelroy; Mr. Le Scouarnec and Mr. Phillips were also present. No violations were found at that time. Therefore, Mr. Muckelroy informed Mr. Phillips that a remediation report should be sent as per Mr. Horst's request delineating the locations where the samples were taken, and an estimate of the quantity spilled. The soil analysis results submitted by Cardinal Laboratories reveal no contamination by RCRA wastes.

However, an in-depth analysis for total petroleum hydrocarbon (TPH) contamination will be conducted by Oil Conservation Division (OCD).