



GARY E. JOHNSON
GOVERNOR
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Report
State of New Mexico

ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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Mrs. Cathy Carter, Chief
RCRA Information Management Sec.
U.S. EPA - Region VI (6PD-1)
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Cathy,

This letter is to verify that the State of New Mexico has completed the 1995 Hazardous Waste Report advanced edits. You will find that on the Advanced Edit Report, there are facilities that continually come up as errors. Listed below are the facilities with explanations on errors that are not valid. This is due to the BRS system not being able to accommodate special situations.

1. EPA ID # NMD035677244 - Brothers Plating Co., Inc.. Site Lvl Edit Error Number 3350 mass balance difference. The total amount generated for 94&95 was 14,400lbs, this does not equal the amount shipped out in 95. The total amount shipped out in 95 was 11,200lbs. A carryover of 3,200 lbs. was shipped out in 96'. Also, Perma-Fix stabilized this waste and disposed it as Non-RCRA regulated. The system does not accommodate this situation that allows a Mobile Treatment Unit to treat waste on-site and remove the waste as Non-RCRA regulated. Also, there are no allowable fields for any hazardous waste carryovers for the following year.
2. EPA ID #NMD052684578 - GE Aircraft Engines. Site Lvl Edit Error Number 3350 mass balance difference. The total amount generated in 95' GM pg. 42 Section II-B is 471Lbs. This waste was shipped off in 96'.
3. EPA ID #NMD014584296 - General Technology Corporation. Site Lvl Edit Error Number 3350 mass balance difference. This facility looks OK
4. EPA ID #NMD000333211 - Giant Refining Company. Site Lvl Edit Error Number 3350 mass balance difference. The total amount generated in 95' GM pg. 3 Section II-B is 441,660 Lbs. This waste was shipped off in 96'.
5. EPA ID #NM0890010515 - U.S. DOE Los Alamos National Laboratory. Error Number 3340 and 3390, calculate the absolute value of the difference between the sum of the quantity of waste generated on form GM Section II, subsection B in tons across all GM forms with origin code 5 and the same Origin System Type; and the RCRA Liquid Effluent Quantity, etc.,; and



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calculate the absolute value of the difference between; the sum of the quantity of waste generated on Form GM Section II, subsection B in tons across all GM forms with origin code 5 and the same origin system type and the RCRA Solid/Sludge residual quantity etc. This error is not valid. The PS Form on page 12 correlates back to the GM Form on page 436. The quantity specified in Section II-A on the PS Form (72600 kg) matches Section II-B of the GM Form on page 436. The Solid/Sludge residual quantity specified in Section II.D on page 12 of the PS Form, correlates back to the GM Form on page 814. Note that this GM Form indicates two separate system types in the comments section (i.e., filtration and carbon absorption and open burning) therefore, and additional PS form (page 9 of 13) was submitted for open burning.

6. EPA ID #NM048918817 - Navajo Refining Company. Site Lvl Edit Error Number 3350 Mass balance difference and error 3390 calculating the absolute value of the difference between GM forms and PS forms. Navajo Refining switched in October, 1995 to a cement kiln fuel blending operation that recovers hydrocarbons and recycles them within the refinery. The fuel blending process also involves recycling of the waste residue into a cement kiln fuel. To turn this material into a fuel that a cement kiln can use, they had to add non-hazardous slurry oil to the mix to raise the BTU value to 10,000. This is over and above the hazardous waste that was actually generated by the plant. However, the solids (which are generated by the plant and include DAF Sludge, Slop Oil Emulsion Solids, Heat Exchanger Bundle Cleaning Sludge, API Separator Sludge, and Petroleum Refining Primary Oil/Water Separator sludge) and the slurry oil that is added are manifested out together as hazardous waste. The net effect of this being that the totals on the forms GM Sec.III box E will never add up to forms GM Sec. II Box B or form PS Sec.II-Box D. Further, the 1995 report only covered two months of this operation, so while the numbers will not add up, they are at least comparable. However, when the next Hazardous Waste Report is due, they will have two years of data on this process and the numbers will be nowhere near each other, again as a result of this added oil.

Navajo has spent considerable sums of money and time implementing a Waste Minimization Program. If they went by just manifested totals, as in Sec.II of form GM, it would seem that their hazardous waste generation is increasing. In fact, the opposite is true. Navajo feels the forms are adequate as they are. They have explained there situation fully in the comment sections. Therefore these errors are not valid.

7. EPA ID #NMD982552945 - Pharmacia Inc. Oncology Div. Site Lvl Edit Error Number 3350 mass balance difference, quantity generated in 95' GM pg. 6 Sec. II Box B: and Sec. III - total quantity shipped same amount in 95' equals 55 gals that was shipped off site for recycling. Error is invalid.

8. EPA ID #NMD980698849 - Safety Kleen Corp.- Farmington. Error Number 3260 EPA ID of off-site installation or transporter must pass EPA ID check digit routine. Error is not valid, Conditionally Exempt Generators are not required to obtain an EPA ID number. Other 3260 errors from out-of-state Colorado, Arizona and Utah should not have been reported in New Mexico's reports, please ignore them. Also the few provisional numbers starting with NMP assigned were for a one time pick-up.

9. EPA ID #NMD000804294 - Safety Kleen Corp.- Albuquerque. Error Number 3260 EPA ID of off-site installation or transporter must pass EPA ID check digit routine. Error is not valid, Conditionally Exempt Generators are not required to obtain and EPA ID Number.

10. EPA ID #NMD083212332 - Sparton Technology, Inc. Error Number 3310, for every system type in which waste was managed on Form GM Section II there must be at least one Form PS that has the same system type in Section I, subsection B. Perma-Fix of NM treated this waste on site and rendered it non-hazardous. PS form is not required for this page. Error is invalid.

Error Number 3311, the sum of the quantity (in tons) managed for a single system type in Form GM, and across all GM forms filed by the same EPA ID must be less than or equal to the sum (in tons) of the RCRA Influent Quantity on Form PS. This error is invalid, please refer to the 1995 Hazardous Waste Report Booklet page 46 - Groundwater contaminated by leachate. #1. Do Not report generation quantities for contaminated groundwater. Enter "NA" in Form GM, Section II, Boxes A and B. Explain in comment section. The system does not recognize the comment section.

11. EPA ID #NMP360050437 - Transwestern Pipeline Company, Atoka No.1 Compressor Sta. Error Number 3350 Site mass balance difference. This error is invalid, on GM pg. 2 the total quantity generated in 95' was 1300 lbs. The total amount shipped off-site in 1995 was 850 lbs. The rest of this waste 450 lbs. was sent to a Norm treatment facility for Radium holding and has not been disposed of.

This is the conclusion of the Advanced Edits. If you find any further data discrepancies that need to be resolved please call me at (505) 827-1558.

Sincerely,



Anna Walker
Management Analyst
NMED/HRMB
Administration and Special Projects

cc: Norma Silva, Program Manager
NMED/HRMB
Administration and Special Projects