

ENTERED

Subject: Roswell Hazardous Waste Generators**Date:** Tue, 17 Jul 2001 13:18:03 -0600**From:** Anna Maestas <Anna_Maestas@nmenv.state.nm.us>**To:** James Bearzi <james_bearzi@nmenv.state.nm.us>

James,

Here's the count of all generator's that are listed for Roswell on the New Mexico Notifiers list:

CESQG's = 20
 SQG's = 29
 LQG's = 8

- An additional 10 Technical Assistance Inspections have been performed within the last few years. These TA's do not appear on the notifiers list.
- Inspectors indicate there may be approximately 20 more mom & pop shops that need to be inspected.
- There may very well be close to 90 generators in Roswell.
- The only true LQG in Roswell is NOVA Bus who generated 64 tons of waste in 1999. LQG's, TSD's and Permitted facilities are required to report Biennially. These facilities report the quantities, nature, and disposition of generated hazardous waste.
- Other LQG's listed are pipelines and compressor stations who have cleanouts every few years which make them an LQG for that certain year. The rest of the time they remain CESQG's. All others listed have notified incorrectly and need to re-notify.
- I estimate that half of the SQG's are really CESQG's and have notified incorrectly. It's just a matter of time before we can inspect everyone in Roswell to determine their status. And you still have to remember that these facilities can fluctuate between CESQG and SQG.

The total number of generators for New Mexico are listed below:

Generator Universes:

- Large Quantity Generator = 106
- Small Quantity Generator = 1002
- Conditionally Exempt Small Quantity Generator = 634

Transporter Universes:

- Transporters = 152

TSDF Universes

- TSDF = 22

Total facilities listed = 2,296

I believe this count is inaccurate. Although the facility total may be slightly higher, the Universes are off somewhat and for a few reasons.

1. Facilities have applied incorrectly. Many sites feel that if they have their waste transported by a hauler, they become a transporter. The transporter count is way off. If we're lucky we have

approximately 8 to 10 real H.W. Transporters. This includes used oil transporters.

2. I'm not sure where they pulled the TSD Facilities from, but New Mexico has only about 4 TSD's, unless they're pulling in the Federal Facilities into the count which is still way under 22.

3. As we inspect facilities we are finding more and more that the SQG's listed are really CESQG's and have notified incorrectly.

The total waste generation in 1999 for New Mexico is 238,558 Tons. I'm sending you a hard copy of this report. It lists the top 39 Large Quantity Generators and total generated by tons, type of waste generated, and how the waste was managed.

Hope this helps. I know you still don't have exactly what you need, but in order to do that, your going to have to create a reporting method for CESQG's and SQG's. Maybe you should start tracking all H.W. manifests in a database. It'll give you what type of waste a facility ships out, the amount, and where it's going.

Anna