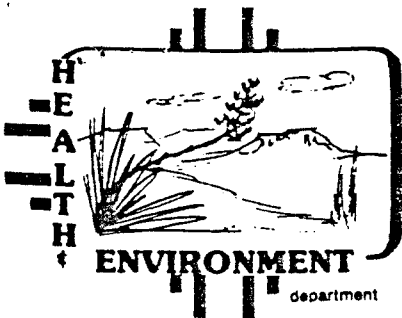


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MEMORANDUM

TO: RAYMOND R. SISNEROS, HEALTH PROGRAM MANAGER, PEM SECTION
FROM: JACK ELLVINGER, ENVIRONMENTAL SCIENTIST, HAZARDOUS WASTE UNIT
RE: PLATEAU REFINING
DATE: APRIL 1, 1983

Plateau Inc., Bloomfield Refinery (NM089416416) located east of Highway 44 on Sullivan Road has recently violated several of the New Mexico Hazardous Waste Regulations according to data received from the Utah Dept. of Health, Division of Environmental Health (see attached letter).

Plateau Refinery has notified as a generator of hazardous waste. In that notification (see attached) they indentified K049 (stop oil emulsion solids), K050 (heat exchange bundle cleaning sludge), K051 (API separator sludge) and K052 (tank bottoms [leaded]) on a periodic basis, as their generated wastes.

A document on file at EID from Plateau Inc. states that four ponds down stream of the API separator are used for evaporation and biological degradation. It goes on to say "sludge is present in the first pond downstream of the API separator." While at Plateau with EPA for the last two inspections I observed that the API separator was not functioning properly and a good deal of material was passing on to the ponds. It is the Hazardous Waste staff's contention that this pit contained K051 wastes.

These items being so, places Plateau in violation of Section 204 (Generators of Hazardous Waste) of the hazardous waste regulations. They are in violation of the very basic regulations, identification and manifesting of hazardous wastes, which constitutes the "cradel to grave" philosophy of the regulations. They are in violation of their notification. The pits receiving wastes from the API separator place Plateau into the TSDF category, for which they do not have interim status. In turn, they are in violation of Section 202 (Notification of Hazardous Waste Activities) and Section 206 (Standards for TSDF.)

This matter is being forwarded to you for presentation to the Legal staff for enforcement action.

JE/ps