

**Monzeglio, Hope, NMENV**

**From:** Monzeglio, Hope, NMENV  
**Sent:** Monday, April 10, 2006 1:50 PM  
**To:** 'Randy Schmaltz'; 'Ed Riege'  
**Cc:** Cobrain, Dave, NMENV; Pullen, Steve, NMENV  
**Subject:** 40 CFR 268.4

Randy

After further discussion internally, NMED came up with other issues concerning the surface impoundments that were not addressed in our April 5, 2006 meeting, concerning 40 CFR 268.4. Please consider the following when deciding whether to permit the surface impoundment:

It has been suggested that GRCB might not permit the surface impoundments because the F037 and F038 listed wastes are addressed by the aggressive biological treatment language in the listing definition, and the D018 benzene characteristic can be addressed through the benzene stripper being required by EPA. The need to address underlying hazardous constituents associated with the D018 remains an issue and was not addressed during the April 5 meeting.

40 CFR § 268.4 allows prohibited wastes (waste that don't meet all applicable treatment standards) into a surface impoundment provided:

- Treatment residuals are sampled and tested with regard to the Universal Treatment Standards,
- If the residual do not attain their standard(s) they must be removed from the surface impoundment on a regular basis, and
- Other listed requirements.

A review of GRCB wastewater characterization taken primarily from analyses performed in association with the injection well, reveal the presence of the following constituents, which would need consideration;

- |                      |               |                  |
|----------------------|---------------|------------------|
| • acetone            | chloromethane | carbon disulfide |
| • chloroform *       | benzene       | toluene          |
| • total Xylenes      | naphthalene   | ethylbenzene     |
| • 2,4-dimethylphenol | fluorene      | phenol           |
| • chrysene           | pyrene        | o-cresol *       |
| • aniline            | phenanthrene  | nitrobenzene *   |
| • arsenic*           | barium *      | mercury *        |
| • silver *           | zinc          | selenium *       |
| • chromium *         | lead *        |                  |

The list of constituents may not be complete because of analytical or reporting limitations and the chemical basis for petroleum listings include significantly more hazardous chemical constituents. GRCB must also determine whether the constituents listed above with an asterisk (\*) could cause the wastewater stream to be characteristically hazardous at its point of generation.

GRCB should discuss the chemical variability of its wastewater stream. Specifically, what changes occur when the plant shuts down for maintenance or when there are changes to crude and product streams?

Let NMED know if you have any questions. Please pass this onto the appropriate parties.

Hope

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