

US EPA ARCHIVE DOCUMENT

Base Program 10/1/84

CAPABILITY ASSESSMENT  
NEW MEXICO ENVIRONMENTAL  
IMPROVEMENT DIVISION (EID)

A. INTRODUCTION

This Capability Assessment has been developed as required by the guidance from Lee M. Thomas, Assistant Administrator for Solid Waste and Emergency Response, dated June 26, 1984. Its purpose is to ensure national consistency in the implementation of RCRA programs in all the States. Performance in accordance with the full set of the Interim National Criteria for a Quality RCRA Program in Authorized States issued May 25, 1984, is the ultimate goal for states with Final Authorization. The Capability Assessment is designed for both the State and the Environmental Protection Agency (EPA) to evaluate the present status of the State's hazardous waste management program against the national criteria for a quality State program. Based on the Capability Assessment, the State and EPA will jointly develop a Letter of Intent which will serve as the multi-year strategy to address specific areas to meet the national quality criteria.

Information contained in the Capability Assessment is drawn from the FY 83 End-of-Year RCRA Review, the FY 84 Midyear RCRA Review and FY 84 accomplishments through September 1984. Other information is drawn from material available in EPA files and visits with the State.

The checklist accompanying this Narrative has been completed to assist in summarizing the assessment of the State's capability. A point-by-point discussion of the elements on the checklist follows.

B. CHECKLIST ELEMENTS

Compliance and Enforcement

- I. Element: State has a multi-year compliance monitoring and enforcement strategy or commits to developing one?

Discussion: The State was not required to have a multi-year compliance monitoring and enforcement strategy in FY 84. The State will submit a draft strategy to Region VI by November 1, 1984. EPA will review the strategy for compliance with guidelines and requirements of a quality program and will provide comments on the draft strategy by December 1, 1984. The State will submit a final strategy by December 31, 1984. The submittal and approval of the strategy will be reflected as grant commitments in the FY 85 RCRA Workplan.

The State will review EPA's Enforcement Response Policy once it is finalized, and if needed, will make changes to the strategy to provide an adequate enforcement program in the State of New Mexico as required for Authorization.

Assessment: Satisfactory

II. Element: State has met grant commitments.

Discussion: The State met its commitments in FY 83 and FY 84. (See Table 1). The following highlights the percentage of accomplishments.

Table I  
Inspections/Record Reviews

| ACTIVITY      | FISCAL YEAR 1983           |                            |                                 | FISCAL YEAR 1984 |                            |                            |                                                                         |                                |                            |                                                                         |
|---------------|----------------------------|----------------------------|---------------------------------|------------------|----------------------------|----------------------------|-------------------------------------------------------------------------|--------------------------------|----------------------------|-------------------------------------------------------------------------|
|               | T<br>A<br>R<br>G<br>E<br>T | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T | ANNUAL<br>TARGET | MIDYEAR                    |                            |                                                                         | End-of-Year 1984<br>Cumulative |                            |                                                                         |
|               |                            |                            |                                 |                  | T<br>A<br>R<br>G<br>E<br>T | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T<br>O<br>F<br>A<br>N<br>N<br>U<br>A<br>L | T<br>A<br>R<br>G<br>E<br>T     | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T<br>O<br>F<br>A<br>N<br>N<br>U<br>A<br>L |
| Inspections   | 25                         | 25                         | 100                             |                  |                            |                            |                                                                         |                                |                            |                                                                         |
| Major         |                            |                            |                                 | 21               | 9                          | 6                          | 26                                                                      | 21                             | 21                         | 100                                                                     |
| Non-Major     |                            |                            |                                 | 16               | 7                          | 10                         | 63                                                                      | 16                             | 22                         | 138                                                                     |
| Record Review |                            |                            |                                 |                  |                            |                            |                                                                         |                                |                            |                                                                         |
| Closure       | -                          |                            |                                 | 23               | 9                          | 2                          | 9                                                                       | 23                             | 23                         | 100                                                                     |
| Financial     | -                          |                            |                                 | 13               | 5                          | 1                          | 8                                                                       | 13                             | 13                         | 100                                                                     |
| Groundwater   | -                          |                            |                                 | 16               | 7                          | 1                          | 6                                                                       | 16                             | 16                         | 100                                                                     |

\*Record review commitments were on an annual basis in FY 84. Midyear and End-of-Year targets are straightline projections for six months and twelve months, respectively.

°In FY 83, EPA required 25 handlers inspected. The State accomplished 25 inspections. Percentage of accomplishment = 100%

In FY 84, EPA required 21 major and 16 non-major handlers to be inspected. The State accomplished 21 major and 22 non-major inspections through the end of September 1984. Percentage of accomplishment 100% and 138% respectively.

°In FY 83, EPA did not require record reviews.

In FY 84, EPA required 23 closure/post-closure record reviews. The State accomplished 23 closure/post-closure record reviews. Percentage of Accomplishment = 100 %.

In FY 84, EPA required 13 record reviews. The State accomplished 13 financial reviews. Percentage of Accomplishment = 100 %.

In FY 84, EPA required 16 groundwater monitoring record reviews. The State accomplished 16 groundwater monitoring record reviews. Percentage of Accomplishment = 100 %.

Although the State met all commitments, a large proportion of work had to be done during the second half of the year (see midyear statistics on Table I). Regarding future commitments, EID should develop an internal tracking system to track grant commitments. State management should review commitments versus actual accomplishments at least quarterly, and should make plans to resolve or compensate for any problems as they occur, instead of waiting until the discrepancy between actual and targeted accomplishments is difficult to manage. EPA will also be reviewing accomplishments quarterly and will meet with the State if there are short-falls. Again, if commitments are missed, EPA may withhold funds, reprogram dollars into the National Contract, or EPA may take the lead on the missed commitments. However, if missed outputs are unavoidable and cannot be made up, EPA will consider renegotiating the grant commitments. State management should plan at the beginning of the year how grant commitments will be addressed, and how resources should be distributed over the course of the year to meet their goals.

Assessment: Satisfactory

III. Element: Inspections and record reviews are comprehensive and properly documented.

Discussion: Since EID did not have Interim Authorization during FY 83, the State did not have responsibility for lead inspections. However, the following deficiencies were noted during the FY 84 Midyear Review when 17 inspection files were reviewed: Fifteen reports contained blanks and scratch-throughs; four reports of those reports contained ambiguities such as question marks, conflicting checkmarks, and conflicting statements.

Due to the problems noted for the inspection checklist, documentation of violations can be unclear. This is particularly true when the letter to the facility, which usually clarifies these points, appears inconsistent with the inspection checklist. However, the letters themselves document the violations, clearly citing regulatory references and detailing required enforcement action.

During the one sampling overview inspection conducted by EPA, it was noted that adequate sampling, decontamination, quality assurance and chain of custody procedures were followed. Field blanks and duplicates were collected and sent to the laboratory for analysis.

No problems were noted with the record reviews that have been completed.

In summary, EID's inspection checklists are not consistent or of satisfactory quality.

Assessment: Inspection checklist - Needs Improvement; Sampling QA procedures - Satisfactory

Resolution: Since midyear, the inspectors have been told how to correct the deficiencies noted at midyear. If, at the End-of-Year Review, file reviews still show problems with the inspection checklist, (1) a peer review system among EID inspectors will be implemented, (2) inspection checklists completed for any joint inspections will be forwarded to EPA upon completion. EPA, in oversight inspections, will place special emphasis on the quality of inspections and checklist completion. If problems are identified in the FY 85 midyear review, EPA will provide additional training to State staff and will increase the level of oversight.

IV. Elements: State properly classifies violations?

Discussion: Out of fourteen EPA file reviews at midyear, no problems were found in EID's classification of violations; i.e, violations were classified as EPA would have classified them.

The State will review EPA's Enforcement Response Policy once it is finalized, and if needed, will make changes to the strategy to provide an adequate enforcement program in the State of New Mexico as required for Authorization.

Assessment: Satisfactory

V. Element: Enforcement Process

Discussion: Based on midyear file reviews, first level enforcement action was taken in an average of 30 days. The average time out of compliance was 65 days. At midyear, no facilities had been out of compliance longer than 180 days. The fourteen facility files reviewed at midyear showed that seven facilities had Class I violations for a violation rate of 50%.

Through the end of July, EID had made good progress towards bringing facilities with violations back into compliance. A status of facilities follows:

|                            |                      |
|----------------------------|----------------------|
| Brought into compliance    | - 18                 |
| Referred to EPA            | - 4                  |
| Waiting on Lab Results     | - 2                  |
| Facility response not due  | - 3                  |
| Facility response received | -                    |
| not evaluated              | - 1                  |
| Facility Response overdue  | - 1 (1 week overdue) |

A comparison of EID responses to violations where EPA has also been involved shows that EID has made a similar type of response to the type EPA would have made.

Although no second level enforcement actions have been used by EID in FY 84, EID has been achieving a timely and effective response through first level actions and conscientious follow-up. EID has also asserted that it will take second level enforcement action when first level action does not evoke an adequate response. An Enforcement Memorandum of Understanding (MOU) between the State and EPA will contain details and specifications of appropriate enforcement actions. This Enforcement MOU must be signed by September 30, 1984.

File reviews show that enforcement actions taken are well documented.

Although EID has been successful in returning violators back to compliance with first level enforcement actions, EPA is concerned that this type of enforcement actions will not be an effective deterrent to future violations. During FY 85, EPA will compare the FY 84 violation rate of 50% to the FY 85 quarterly violation rate to determine if progress is being made to decrease the violation rate. If it is shown that Class I violators are undeterred by first level enforcement actions and continue to violate, EPA will ask the State to seek legislative approval for administrative civil penalties. Administrative civil penalties that can be issued directly by EID would be timely and effective enforcement actions that would generate more attention and avoidance of repeat violators than a mere warning letter or notice of violation. Administrative penalties are preferable to civil referrals because they are much more timely, and the State agency has tight control over the process of negotiation and settlement. EPA will offer assistance to EID in developing legislative language or in preparing justification for such a course of action.

Assessment: Satisfactory

#### Permitting

##### I. Element: Permit Strategy

Discussion: New Mexico was not required to have a formal permitting strategy in place in FY 84. EID will submit a draft permitting strategy by November 1, 1984. EPA will review the strategy for compliance with guidelines and requirements of a quality program, and will provide comments by December 1, 1984. The State will submit a final Strategy by December 31, 1984. The submittal and approval of the strategy will be reflected as grant commitments in the FY 85 RCRA Workplan. EID has indicated it will call-in all remaining land disposal facilities in FY 85 (no incinerators in N.M.). Since EID only has Phase II, Components A & B, Interim Authorization, until it receives Final Authorization, EPA will also be involved in the call-in and processing of land disposal applications at least during the first quarter of FY 85. Permit final determinations should be processed by the time frames in Interim Quality Criteria, as illustrated by New Mexico's permit decision schedule (see attachment 1).

Assessment: Satisfactory

## II. Element: Permit Processing

Discussion: Permit call-in commitments were met. As mentioned above, EID does not yet have Phase II C Interim Authorization. To insure a smooth transition when EID receives Final Authorization, EID is calling-in land disposal applications under State regulations at the same time EPA is calling-in these facilities. This will allow for joint processing and issuance of permits before Final Authorization is achieved. If a permit is issued by the State that is similar to EPA's permit (before Final Authorization), that permit can become a RCRA permit after the State receives Final Authorization. Consequently, EID has called-in an additional five land disposal Part B applications in FY 84.

EID has not had the opportunity to process many permit applications. The first permit for which EID has responsibility from Part B receipt to issuance is taking an excessive amount of time to process. EPA reviewed and prepared a draft Notice of Deficiency (NOD) on a voluntary Part B submission. The draft NOD was sent to the State to review, make changes as necessary, and then send to the facility. It took EID four months to issue the NOD. However, during this time, EID made revisions to the draft NOD developed by EPA. The four-month period must be reduced for future NODs so that permits can be processed according to the dates in the permit decision schedule.

EID met final determination and call-in commitments, but not the draft permit commitment. Two final determinations had been made by the end of September 1984, one closure and one storage permit. EID committed to two draft permits in FY 84, and only achieved one; one of the facilities closed for which they anticipated developing a draft permit. However, if they had processed the voluntary submission discussed previously in a timely manner, EID could have made its commitment of two draft permits.

An issue unique to New Mexico is the fact that a large percentage of the major facilities in the State are Department of Defense (DOD) or Department of Energy (DOE) related. Although this has not hampered FY 84 permit activities, it may in the future since there are still policy issues to be resolved nationally regarding DOD/DOE facilities.

EID has the skills mix available to make these accomplishments. In addition to the environmental scientists and geologists on staff, EID is contracting with a soil scientist in FY 85. Although the skills mix is satisfactory, the amount of resources needed to process the call-ins from FY 84, as well as the new facilities called in FY 85, may be inadequate. According to a resource analysis by EPA, EID will need nine workyears for permitting in FY 85 and six workyears in FY 86. The State committed to 2.5 workyears in FY 84 and is planning to commit four workyears in FY 85. EID has requested EPA assistance. The State could use an Intergovernmental Personnel Act (IPA) assignee familiar with the RCRA permit process, particularly the land disposal/groundwater regulations, to help expedite the permitting process and insure a smooth transition of permit activity after authorization. Therefore, EPA will provide technical assistance to EID, especially in the area of land disposal permits.

TABLE 2 - PERMITTING

| ACTIVITY                                  | FISCAL YEAR *<br>1983      |                            |                                 | FISCAL YEAR 1984 ** |                            |                            |                                                                    |                                |                            |                                                                    |
|-------------------------------------------|----------------------------|----------------------------|---------------------------------|---------------------|----------------------------|----------------------------|--------------------------------------------------------------------|--------------------------------|----------------------------|--------------------------------------------------------------------|
|                                           | T<br>A<br>R<br>G<br>E<br>T | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T | ANNUAL<br>TARGET    | MIDYEAR                    |                            |                                                                    | End-of-Year 1984<br>Cumulative |                            |                                                                    |
|                                           |                            |                            |                                 |                     | T<br>A<br>R<br>G<br>E<br>T | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T<br>F<br>A<br>C<br>T<br>U<br>A<br>L | T<br>A<br>R<br>G<br>E<br>T     | A<br>C<br>T<br>U<br>A<br>L | P<br>E<br>R<br>C<br>E<br>N<br>T<br>F<br>A<br>C<br>T<br>U<br>A<br>L |
| Call-ins<br>Storage<br>Land Dis-<br>posal | -                          |                            |                                 | 4<br>0              | 2<br>0                     | 2<br>0                     | 50<br>-                                                            | 4<br>0                         | 4<br>5                     | 100                                                                |
| Draft Permits<br>Storage                  | -                          |                            |                                 | 2                   | 1                          | 1                          | 50                                                                 | 2                              | 1***                       | 50                                                                 |
| Final Deter-<br>minations<br>Storage      | -                          |                            |                                 | 2                   | 1                          | 0                          | 0                                                                  | 2                              | 2                          | 100                                                                |

\* EID did not have Interim Authorization and therefore did not have permitting commitments in FY 83.

\*\* State made annual commitments, not quarterly, in FY 84. Thus, targets are based on straight-line projections for six months and twelve months, respectively.  
\*\*\* One of the two facilities for which EID committed to drafting a permit closed.

In summary, EID is taking an excessive time to process permits.

Assessment: Satisfactory, with EPA technical assistance. Needs improvement on permit processing times.

Resolution: Permitting is a very high national priority in the next few years. EID management should focus in the future on meeting permit commitments. Permitting commitments are equally as important as inspection and record review commitments, and should be allocated resources accordingly. Notices of Deficiency should be issued in a timely manner as agreed to in the Enforcement MOU. EPA will evaluate progress in meeting commitments quarterly. Also, EPA will provide technical assistance on land disposal applications. However, if permit processing times fall behind the schedule in Attachment 1 (i.e. if quarterly commitments aren't met), EPA will meet with the State to consider: 1) schedule changes; 2) increasing EPA technical assistance; 3) reprogramming grant funds into EPA's National Contract; 4) turning over responsibility for certain permits entirely to EPA; and 5) sending an Intergovernmental Personnel Act (IPA) assignee to New Mexico.

#### Management/Reporting

##### I. Element: Management

##### Discussion:

##### A. Allocation of Resources

EID requested a variation from the FY 84 grant guidance, as follows:

| <u>Category</u>             | <u>FY 84<br/>Guidance</u> | <u>New Mexico<br/>Actual</u> |
|-----------------------------|---------------------------|------------------------------|
| Authorization<br>remainder: | 10-20%                    | 12.2%                        |
| Compliance                  | 30-40%                    | 48%                          |
| Permitting                  | 50-60%                    | 30.3%                        |
| Administration              | 10-20%                    | 10.8%                        |
| Emergency Response          |                           | 10.8%                        |

However, through August, New Mexico has not utilized resources as outlined in the grant (See Table 3). A preponderance of resources has been devoted to the compliance monitoring/enforcement effort. The disproportionate share of resources to permitting was due to the fact that only two permit applications were in-house during the first part of the FY 84. These applications both had legal obstacles that prevented staff from devoting a lot of time to them. One had a question of legal ownership which was being researched by EID's legal staff. The other had a pending EPA compliance order which EID was waiting to be resolved. Although these circumstances explain why workyear utilization was low in permitting, they may also indicate that vacancies in the program, such as the attorney, could have alleviated these problems, and allowed additional progress in meeting commitments (e.g. draft permits).

TABLE 3  
Workyear Utilization

| <u>Category</u>                        | <u>Commitment</u> | <u>Actual</u> | <u>Percent</u> |
|----------------------------------------|-------------------|---------------|----------------|
| Program Administration/<br>Development | 3.2               | 1.83          | 57%            |
| Compliance                             | 3.7               | 3.89          | 105%           |
| Permitting                             | 2.3               | .73           | 32%            |
| Emergency<br>Response                  | .92               | .63           | 68%            |
| Total                                  | 10.1              | 7.08          | 70%            |

In FY 85, the State plans to follow RCRA Implementation Plan guidance regarding the distribution of resources as much as possible. But New Mexico has a small number of land disposal facilities (no incinerators), and may not need 50% of its resources devoted to permitting.

#### B. Staff and Training

At midyear, EID had ten positions in its RCRA program, three of which were vacant - the program manager, a secretary and an attorney. Since midyear, the program manager position has been filled, but from within the RCRA ranks, still leaving a vacancy. Also, the Attorney position has been filled. There is a freeze on hiring the secretary. Three more positions became available for hire on July 1, 1984 - two Environmental Scientists III and a Water Resource Specialist II. The Water Resource Specialist position is already filled, and one of the Environmental Scientist positions has been advertised and is close to being filled.

State personnel do not receive an annual update on personnel safety training nor do they have any requirements for annual biomedical monitoring or physicals. New employees have been sent into the field without any personnel safety training. Since midyear, the new employees have received safety training. In the future, new employees should receive such training before beginning field work.

#### C. Institutional Constraints

The major institutional constraint that has caused problems (but not program problems) has been the sister division of EID, the Administrative Services Division (ASD). Recently, the Governor of New Mexico, elevated EID to department status, so that EID and ASD are not even in the same department any more. ASD has been very late in submitting financial reports in violation of federal regulations, making it hard for both EPA and the State to assess EID's financial position. (For example, the FY 83 Final Financial Status Report was due December 31, 1983, but was submitted June 22, 1984.)

#### D. Data System

The State has ordered equipment to utilize the HWDMS systems, but it has not yet been received. Reports are manual, and forms are now being completed accurately. In the past, EID submitted incomplete logs for sampling inspections when they were still waiting for laboratory results. EPA consulted with EID and asked that the logs be held until results were completed.

In summary, EID needs to fill vacancies, make sure resources go where most needed, and improve financial reporting.

Assessment: Needs Improvement

Resolution:

1) EID management must insure that priority activities are given adequate resources to meet grant commitments. If it appears that resources aren't adequate, EID should contact EPA early in the fiscal year so that EID and EPA can make adjustments to resolve the problem.

2) All vacancies should be filled as soon as possible to lend needed support to the existing State resources. Management should also consider alternative solutions, such as overhiring, filling positions on a temporary basis, and hiring consultants.

3) EPA's grants management branch has written to ASD concerning some of the financial reporting problems. If not appropriately addressed, EPA will then contact the Secretary of Health and Environment Department of which ASD is a part. This problem can ultimately jeopardize all program grants to EID.

## II. Element: Reporting

Discussion: EID has established good lines of communication with EPA, notifying EPA of any program, organizational, political or regulatory/statutory changes. Routine monthly reporting is not as satisfactory. Although Compliance Monitoring and Enforcement logs are submitted as completed during the month, the Permit Status Sheets and Major Facility Status Sheets are not submitted each month. The Major Facility Status Sheets were submitted on September 20, 1984, but many of the reports required clarification or correction.

Assessment: Needs Improvement

Resolution: If no changes are necessary to the Permit Status or Major Facility Status Sheets, EID will so inform EPA. If EID needs training/assistance in completing sheets, EPA will be notified. Otherwise, EID must submit reports as required in the grant workplan.

Region VI  
Capability Assessment Checklist  
State of NEW MEXICO

COMPLIANCE & ENFORCEMENT

State has multi-year compliance monitoring and enforcement strategy or commits to developing one?

\*\*\*\*\*

State has met grant commitments for:

- ° inspection of major handlers,
- ° inspection of non-major handlers,
- ° evaluation and verification of closure/post-closure plans and withdrawal requests,
- ° record reviews.

\*\*\*\*\*

Inspections and record reviews are comprehensive and properly documented.

- ° Inspection checklists completed accurately.
- ° Violations well documented.
- ° Sampling quality assurance/quality control procedures followed.

\*\*\*\*\*

State properly classifies violations?

\*\*\*\*\*

Enforcement Process

- ° Compliance/enforcement efforts concentrate on critical programmatic areas.
- ° All enforcement tools used to full advantage.
- ° Timely enforcement actions taken in response to detected violations.
- ° State follows-up informal and formal enforcement actions to ensure violators are returned to compliance.
- ° Enforcement actions well documented.

| Satisfactory         | Needs Improvement |
|----------------------|-------------------|
| X                    |                   |
| //////////////////// |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| //////////////////// |                   |
|                      | X                 |
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| X                    |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |

## PERMITS

Permit Strategy

- Permit strategy in accordance with Agency guidance including:
  - time frames for requesting permits (land disposal and incineration-FY85; storage - FY 87),
  - time frames for final determinations (land disposal-FY 83-88, incinerators-FY 82-88, storage and treatment-FY 82-89),
  - addresses priorities for processing individual facilities.

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Permit Processing

- Requests made in accordance with strategy or grant commitments.
- Applications processed in timely manner in accordance with strategy or grant commitments.
- State responds properly to late or deficient Part B's.
- Closure/post-closure plans reviewed and final determinations made in accordance with regulatory requirements.
- Permits processed in accordance with EPA-approved State administrative procedures.
- Permit conditions are consistent with EPA-approved State requirements.
- Permit conditions are enforceable and properly documented.

| Satisfactory         | Needs Improvement |
|----------------------|-------------------|
| //////////////////// |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| //////////////////// |                   |
| X                    |                   |
|                      | X                 |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |
| X                    |                   |

MANAGEMENT/REPORTING

## Management

- Resources allocated in accordance with grant.
- Staff adequately trained; appropriate skill mix.
- Institutional constraints do not hamper program effectiveness (organization, salaries, etc.).
- State effectively utilizes information/data system in support of their program; system provides timely and accurate permit and enforcement status information.

\*\*\*\*\*

## Reporting

- State informs EPA of program changes.
- State meets MOA commitments for reporting, program coordination, etc.

| Satisfactory | Needs Improvement |
|--------------|-------------------|
| //////////   |                   |
|              | X                 |
|              | X                 |
|              | X                 |
| X            |                   |
| //////////   |                   |
| X            |                   |
|              | X                 |

# ATTACHMENT 1

## NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION FACILITY DECISION SCHEDULE

CATEGORY: Storage, p. 1 of 1

| <u>FACILITY ID #</u> | <u>FACILITY NAME</u>           | <u>PART B CALLED</u> | <u>PART B--TO<br/>BE CALLED</u> | <u>PART B<br/>RECEIVED</u> | <u>COMPL<br/>DETER</u> |
|----------------------|--------------------------------|----------------------|---------------------------------|----------------------------|------------------------|
| NM075088252          | New Mexico State<br>University | 1/27/82              | —                               | 7/28/83                    | 2/                     |
| NMD080370786         | McKesson Chemical<br>Company   | —                    | —                               | 2/29/84                    | (                      |
| NM9570024423         | U.S.A.F. Kirkland              | 11/16/83             | —                               | 7/1/84                     |                        |
| NMD000709782         | Signetics Corp.                | 2/15/84              | —                               | 8/9/84                     |                        |
| NMD052684578         | General Electric               | 1/27/82              | —                               | 7/31/82                    | —                      |
| NMD083212332         | Sparton                        | 8/15/84              | —                               | 2/85                       |                        |