



TRAILER SERVICE, INC.

SEMI-TRAILER REPAIR
P.O. BOX 16722
2033 E. 58TH AVENUE
DENVER, CO 80216

303-295-7556
FAX 303-292-3856
trlsr@idcomm.com

2009 SEP 29 PM 3:22

FILED
EPA REGION VIII
HEARING CLERK

September 28, 2009

Ms. Britta Copt (Mail Code 8ENF-UFO)
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202

RE: Trailer Services, Inc.
Docket No. SDWA-0802009-0072
Order Granting Extension of Time to File Answer

Dear Ms. Copt,

We are providing our response to the Order Granting Extension of Time to File Answer, dated September 1, 2009 in the matter of the Proposed Compliance Order ("the Order") Docket No. SDWA-0802009-0072 for the Trailer Services Inc. property ("the Property").

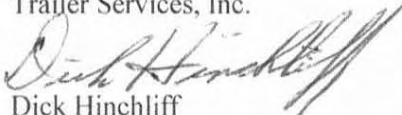
Appropriate inquiries and investigations have been performed and verification made that the structure referenced under the General Allegations of the Order as a Class V Injection Well is in fact a "sand trap" or sediment trap, with in-line connection to the sanitary sewer system. The sand trap is constructed of pre-formed concrete with total fluids capacity of app. 475 gallons. The structure was installed at the Property as part of the original facility construction to capture solids and oil and grease that may be entrained in the influent. Influent flow is directed from the facility to the sand trap through dedicated piping and is contained within the structure until fluid capacity is attained at which point accumulated fluids are discharged through a fixed connection to the sanitary sewer line. Sediments and oil and grease that may have accumulated in the structure are removed and managed off-site in accordance with applicable requirements. No release to ground water or the environment occurs from the structure.

Verification of the structure installation and function was performed using original facility design drawings, inspection by licensed sewer cleaning entity and observation by environmental professional. Samples of the material accumulated in the sand trap were collected and analyzed for metals and organics. Sample results indicated this material is non-hazardous and suitable for discharge to the sanitary sewer or otherwise managed off-site as a non-hazardous material. Photographs of the structure were also taken to document the structure configuration and condition. The following are provided as part of the evidence record for the determination that the referenced structure is not a Class V Injection Well.

- Exhibit A: facility construction drawing showing approximate sand trap location
- Exhibit B: photographs & DVD on shop internal & main line connections
- Exhibit C: certification statement by environmental professional
- Exhibit D: lab test of the initial tank material/solution
- Exhibit E: Colorado Sewer System test & DVD's

Submittal of our initial response in this matter on August 21, 2009 and this follow-up response satisfies all conditions contained in the Proposed Compliance Order and subsequent extension and we are requesting dismissal of all claims made in the Order and settlement of this case with no further action. Please call me at phone 303-295-7556 if you require any additional information in this matter.

Respectfully,
Trailer Services, Inc.



Dick Hinchliff
President

w/enclosures

**cc: Ms. Tina Artemis
&Ms. Brenda Morris**

WASH BAY

PIT AREA

MAINTENANCE

OFFICE

OFFICE

OFFICE

RECEPT.

RECEPT.

RECEPT.

This line is NOT there changed to run thru the building
48'-0"
2" VCT

Stand rear location sand on diagram NOTHS on plan 3/4"

4'-0" dia. sand trap

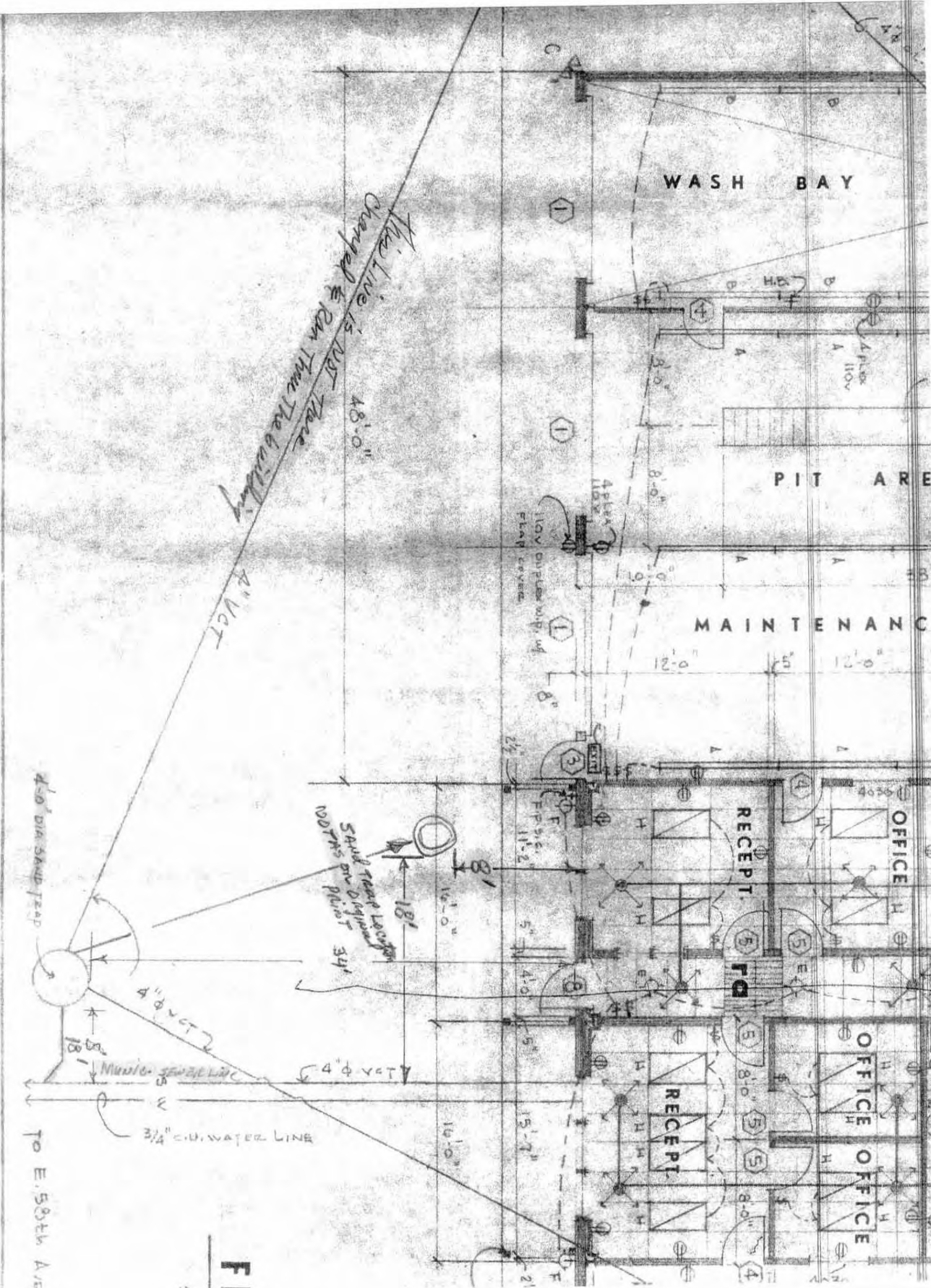
4" VCT

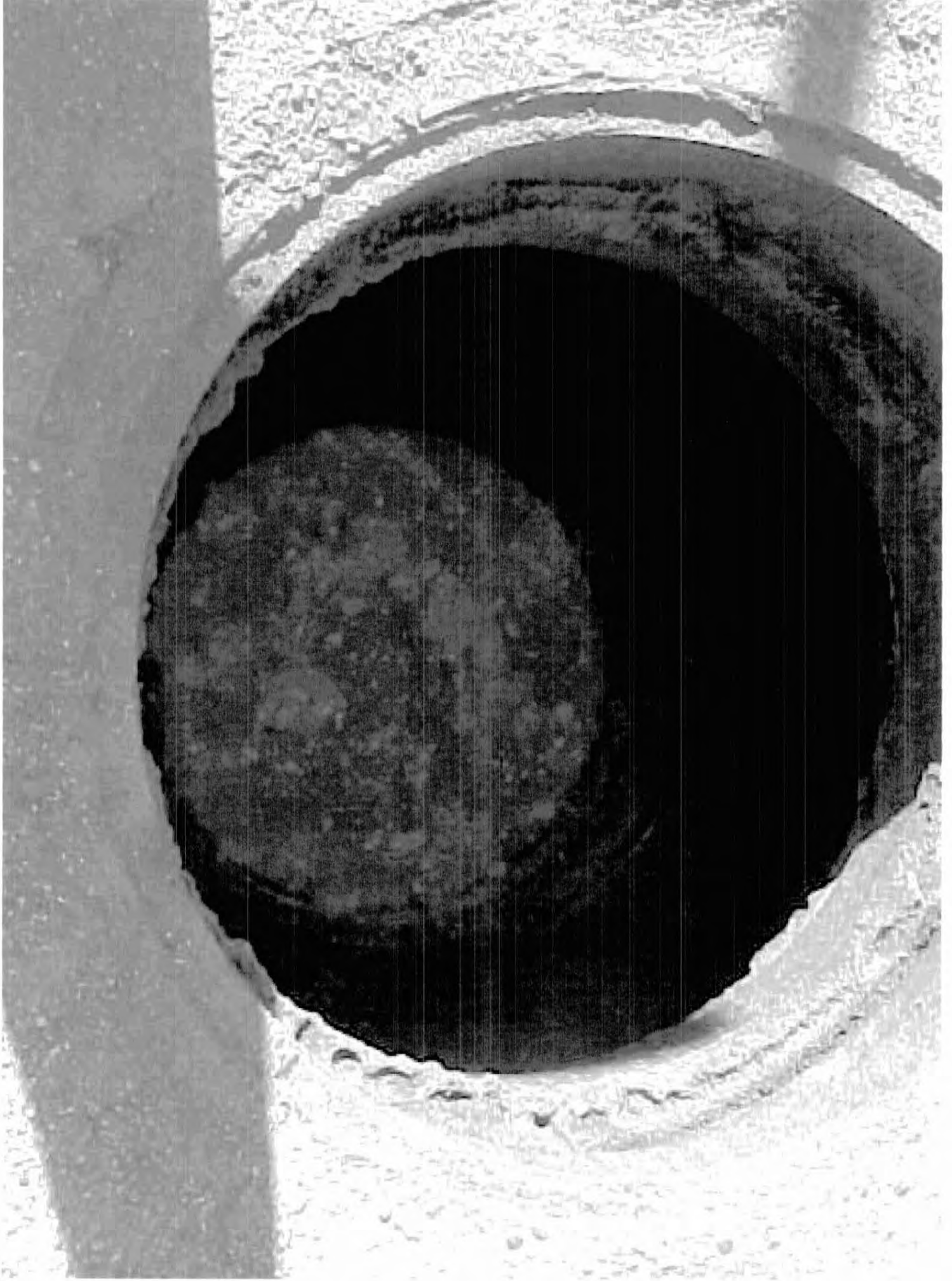
MINOR SEWER LINE

3/4" C.D. WATER LINE

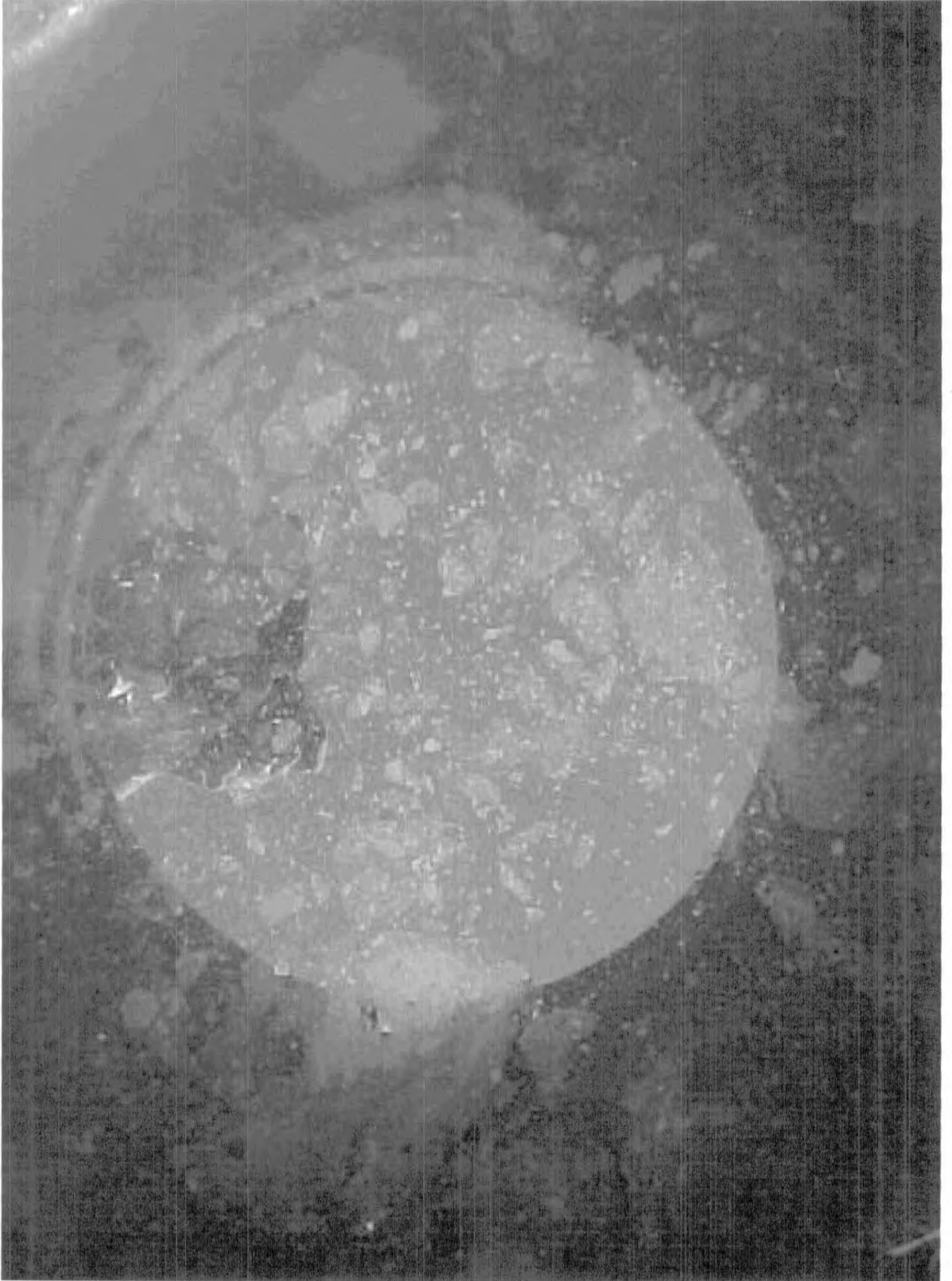
TO E. 58th Ave

F1

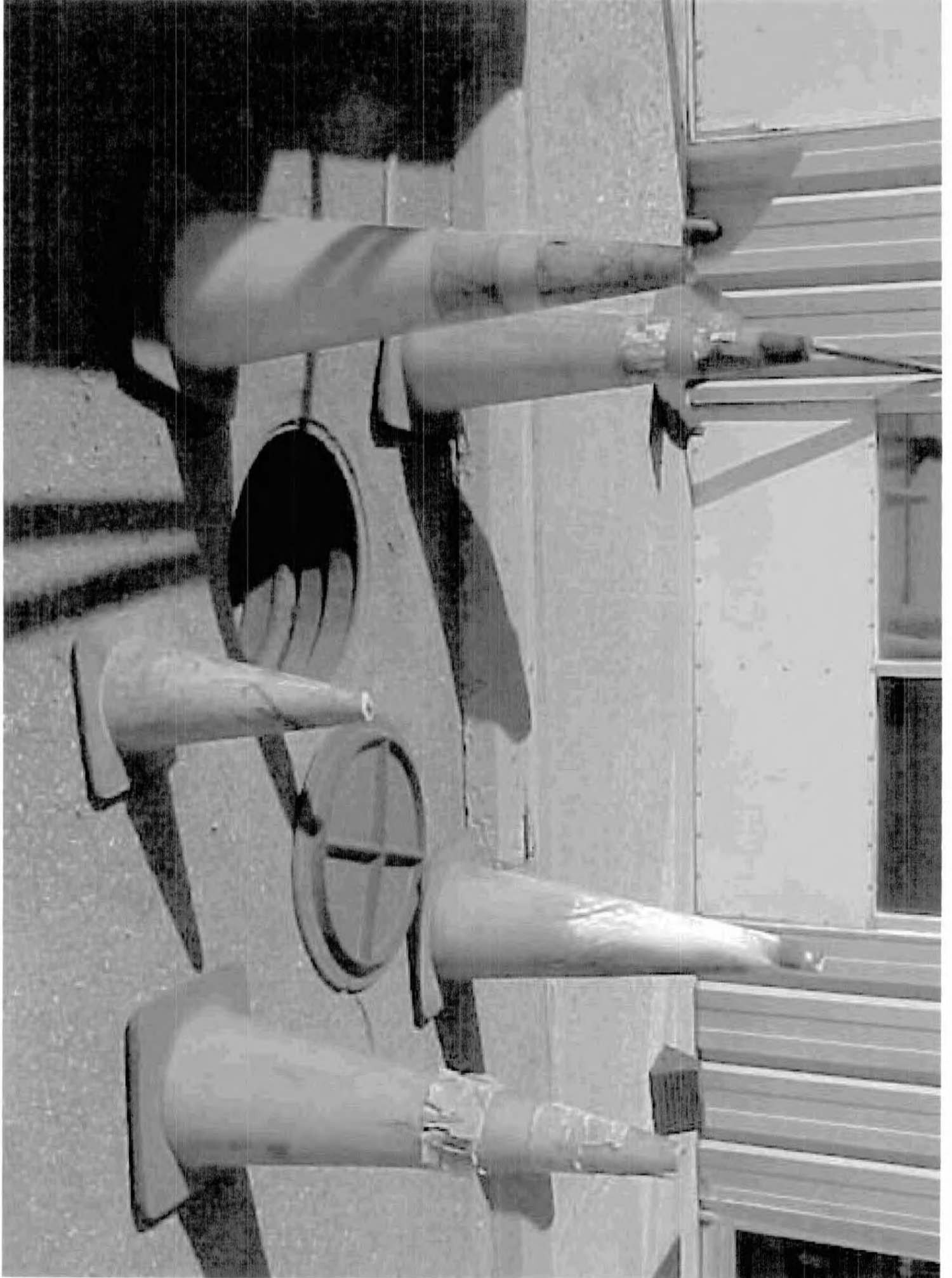




CP







**TRAILER
SERVICE!**
20333 + 2995
E. 58TH. + 7556

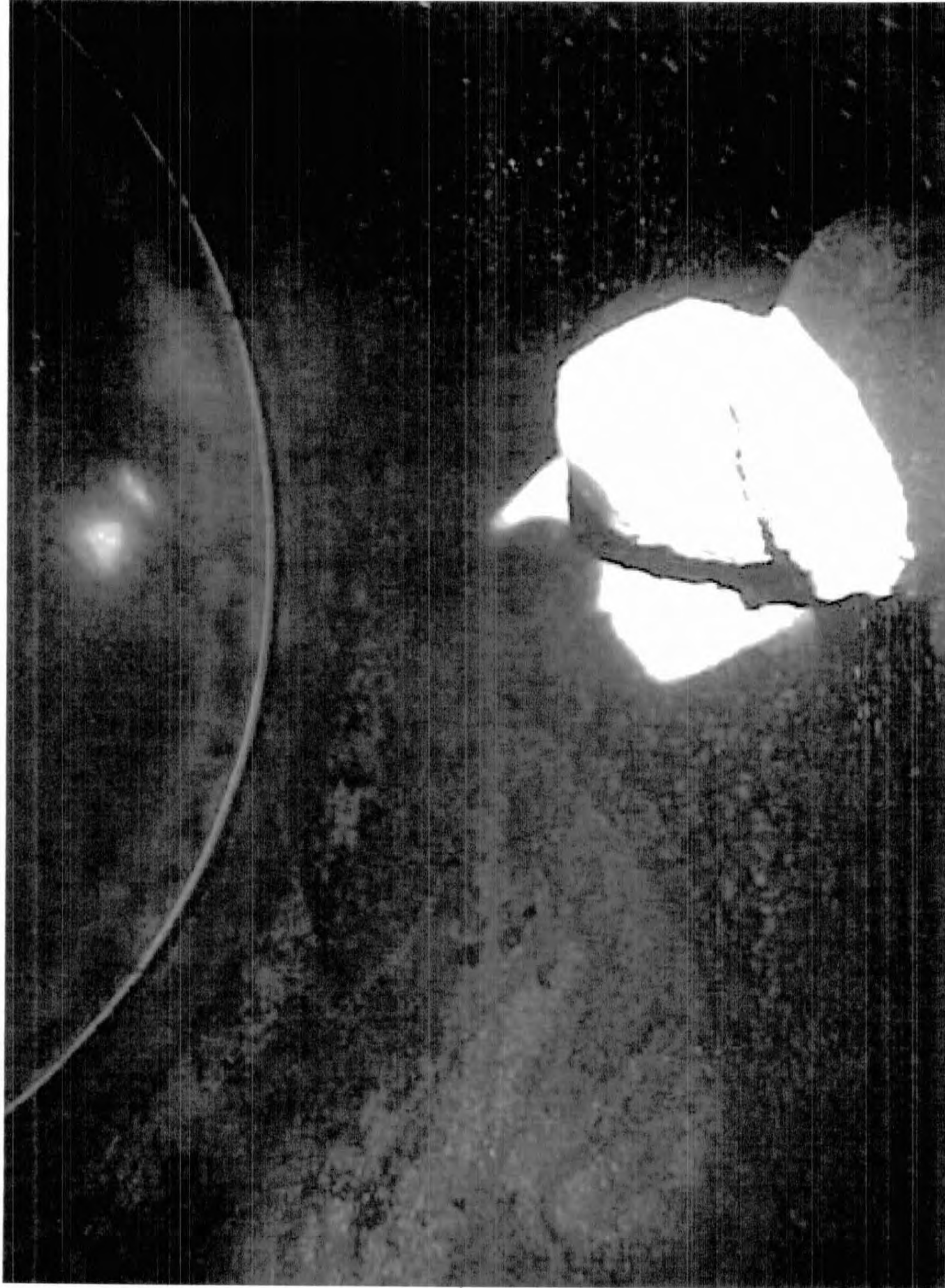
20333
E. 58TH

→ **OFFICE**

EXTRA

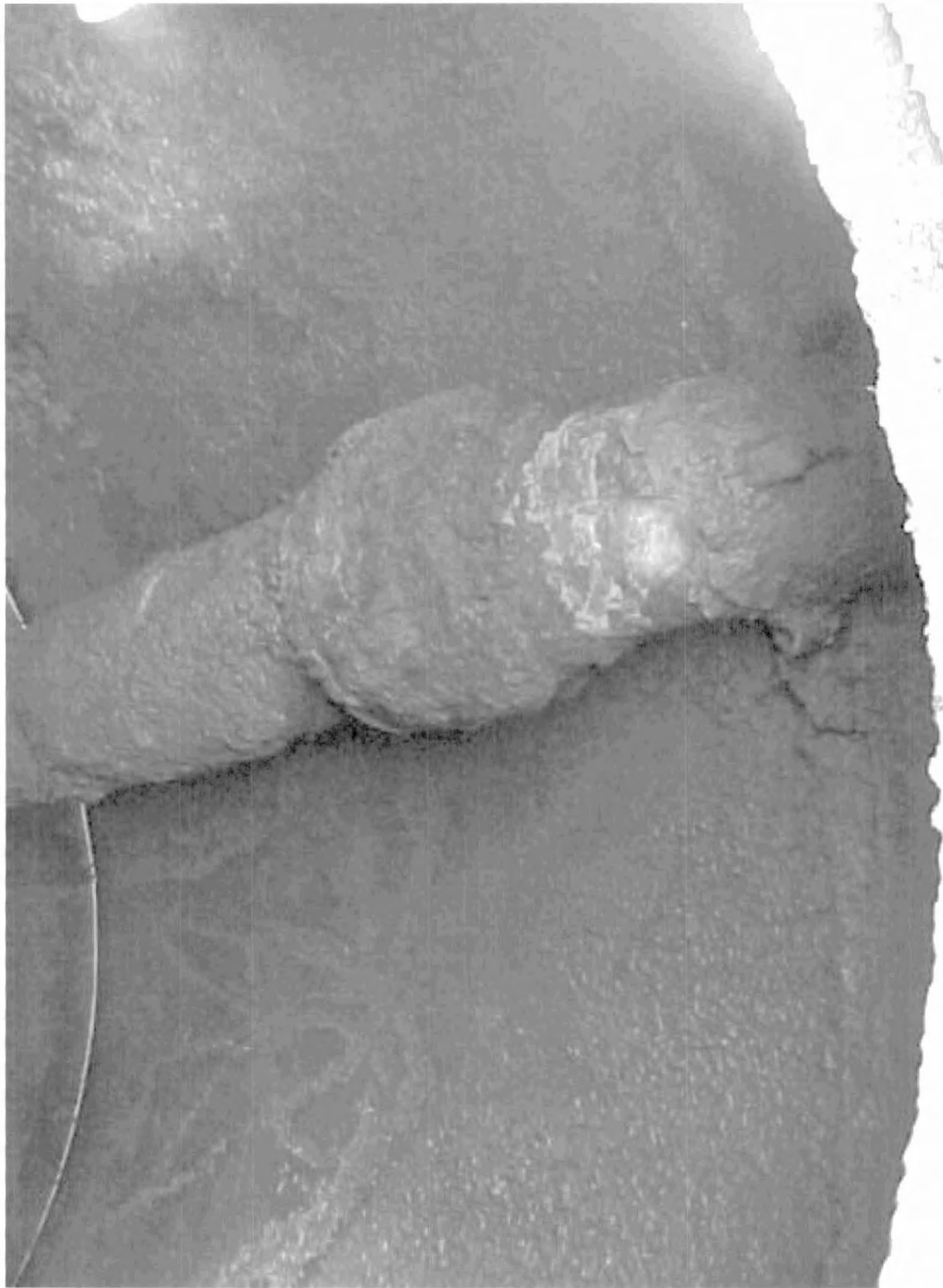


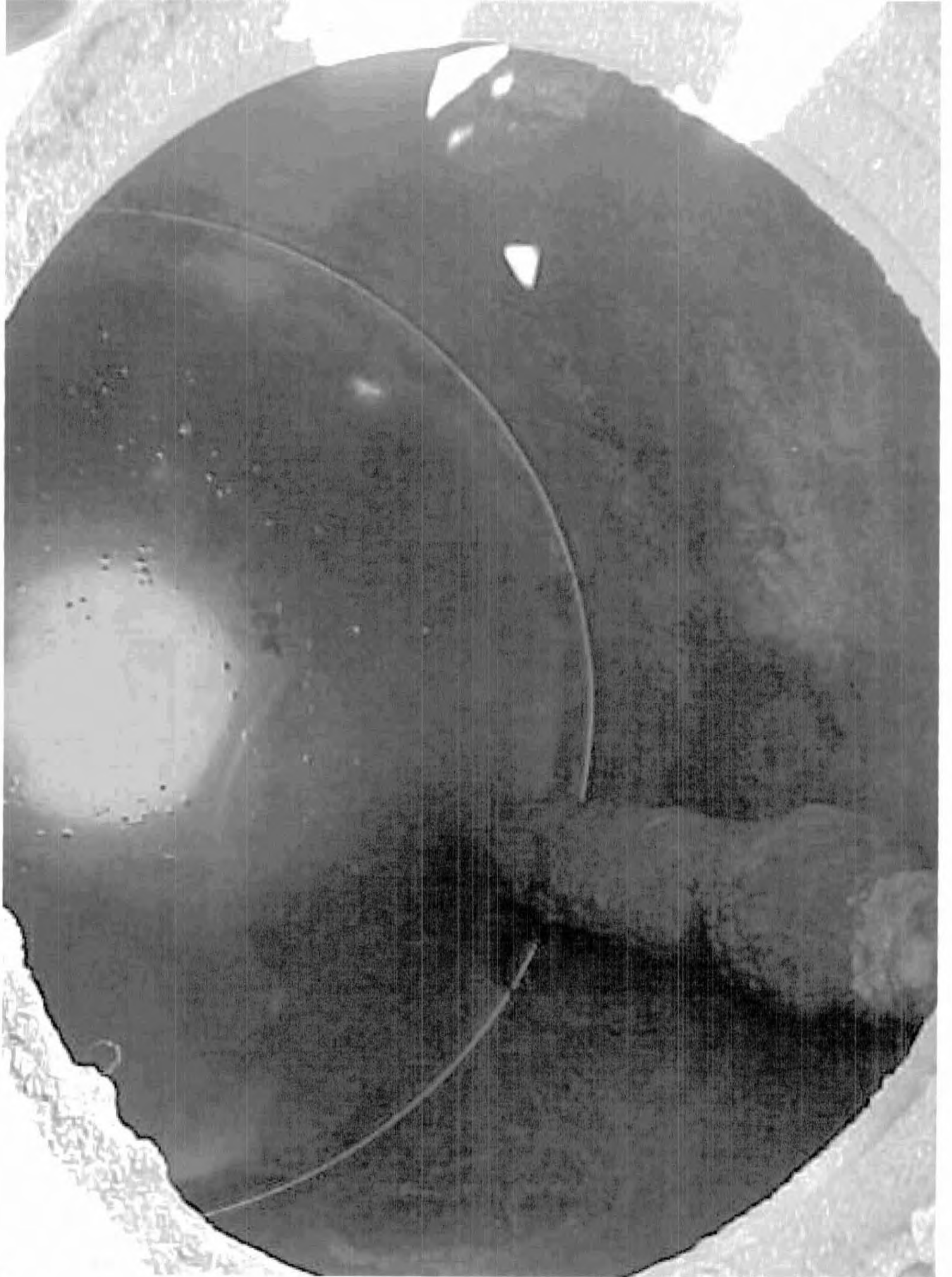
03



25

nt





2



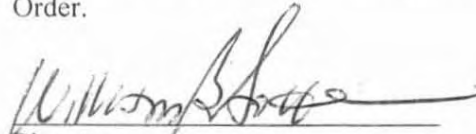
Docket No.: USEPA SDWA-08-2009-0072

Location: Trailer Services, Inc.
2033 E. 58th Avenue
Denver, Colorado 80216

Re: Order Granting Extension of Time to File Answer

Certification

The person below has performed appropriate inquiries and investigations and affirms that the structure referenced in the US EPA Proposed Compliance Order ref: SDWA-08-2009-0072, dated July 28, 2009 is in fact a sand trap also termed a sediment trap with direct connection to the municipal sewer system and is not a Class V Injection Well known as a Motor Vehicle Waste Disposal Well as represented in the General Allegations of the Proposed Compliance Order.



Signature
William B. Dotterweich

Printed Name

Env. Eng.

Title

9/25/09

Date

Docket No.: USEPA SDWA-08-2009-0072

Location: Trailer Services, Inc.
2033 E. 58th Avenue
Denver, Colorado 80216

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1763450

James C. Jamray
Signature
JAMES C. JAMRAY
Printed Name
District Manager
Title

9-28-09
Date

Docket No.: USEPA SDWA-08-2009-0072

Location: Trailer Services, Inc.
2033 E. 58th Avenue
Denver, Colorado 80216

Re: Order Granting Extension of Time to File Answer

Certification

The person below has performed appropriate inquiries and investigations and affirms that the structure referenced in the US EPA Proposed Compliance Order ref: SDWA-08-2009-0072, dated July 28, 2009 is in fact a sand trap also termed a sediment trap with direct connection to the municipal sewer system and is not a Class V Injection Well known as a Motor Vehicle Waste Disposal Well as represented in the General Allegations of the Proposed Compliance Order.

Columbia Sanitary Service
Dennis Nessler
Signature
DENNIS NESSLER
Printed Name
Vice Pres.
Title

9-28-09
Date

TESTAMERICA LABORATORIES, INC.
PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: D9H200333 **Nationwide Environmental Services** PAGE 1
 Stormwater Date Reported: 8/28/09
 Project Number: Trailer Services

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: ST-1-01

Sample #: 001 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	REMARKS
Inductively Coupled Plasma (ICP) Metals					Reviewed
Silver	ND	10	ug/L	SW846 6010B	
Arsenic	5.4 B	15	ug/L	SW846 6010B	
Barium	200	10	ug/L	SW846 6010B	
Cadmium	5.0	5.0	ug/L	SW846 6010B	
Chromium	16	10	ug/L	SW846 6010B	
Lead	220	9.0	ug/L	SW846 6010B	
Selenium	ND	15	ug/L	SW846 6010B	

Mercury in Liquid Waste (Manual Cold-Vapor)					Reviewed
Mercury	ND	0.20	ug/L	SW846 7470A	

B Estimated result. Result is less than RL.

Client Sample ID: ST-1-02

Sample #: 002 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Semivolatile Organic Compounds by GC/MS In Review
IN PROGRESS

Client Sample ID: ST-1-03

Sample #: 003 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Inorganic Analysis					Reviewed
N-Hexane Extractable Material (1664A)	21	5.0	mg/L	CFR136A 1664A HEM	

TESTAMERICA LABORATORIES, INC.
PRELIMINARY DATA SUMMARY

 The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: D9H200333
 Nationwide Environmental Services Stormwater
 Project Number: Trailer Services
 Date Reported: 8/31/09

PAGE 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: ST-1-01

Sample #: 001 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Inductively Coupled Plasma (ICP) Metals				Reviewed
Silver	ND	10	ug/L	SW846 6010B
Arsenic	5.4 B	15	ug/L	SW846 6010B
Barium	200	10	ug/L	SW846 6010B
Cadmium	5.0	5.0	ug/L	SW846 6010B
Chromium	16	10	ug/L	SW846 6010B
Lead	220	9.0	ug/L	SW846 6010B
Selenium	ND	15	ug/L	SW846 6010B

Mercury in Liquid Waste (Manual Cold-Vapor)				Reviewed
Mercury	ND	0.20	ug/L	SW846 7470A

B Estimated result. Result is less than RL.

Client Sample ID: ST-1-02

Sample #: 002 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Semivolatile Organic Compounds by GC/MS				In Review
Benzidine	ND	1000	ug/L	SW846 8270C
Acenaphthene	ND	40	ug/L	SW846 8270C
Acenaphthylene	ND	40	ug/L	SW846 8270C
Acetophenone	ND	100	ug/L	SW846 8270C
Anthracene	ND	40	ug/L	SW846 8270C
Benzo (a) anthracene	ND	40	ug/L	SW846 8270C
Benzo (b) fluoranthene	ND	40	ug/L	SW846 8270C
Benzo (k) fluoranthene	ND	40	ug/L	SW846 8270C
Benzo (ghi) perylene	ND	40	ug/L	SW846 8270C
Benzo (a) pyrene	ND	40	ug/L	SW846 8270C
bis (2-Chloroethoxy) methane	ND	100	ug/L	SW846 8270C
bis (2-Chloroethyl) ether	ND	100	ug/L	SW846 8270C
bis (2-Ethylhexyl) phthalate	77 J	100	ug/L	SW846 8270C
4-Bromophenyl phenyl ether	ND	100	ug/L	SW846 8270C

(Continued on next page)

TESTAMERICA LABORATORIES, INC.
PRELIMINARY DATA SUMMARY

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Lot #: D9X200333
 Nationwide Environmental Services Stormwater Date Reported: 8/31/09
 Project Number: Trailer Services

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Client Sample ID: ST-1-02				
Sample #: 002 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER				
Semivolatile Organic Compounds by GC/MS				In Review
Butyl benzyl phthalate	ND	40	ug/L	SW846 8270C
4-Chloroaniline	ND	100	ug/L	SW846 8270C
4-Chloro-3-methylphenol	ND	100	ug/L	SW846 8270C
2-Chloronaphthalene	ND	40	ug/L	SW846 8270C
2-Chlorophenol	ND	100	ug/L	SW846 8270C
4-Chlorophenyl phenyl ether	ND	100	ug/L	SW846 8270C
Chrysene	6.6 J	40	ug/L	SW846 8270C
Dibenz(a,h)anthracene	ND	40	ug/L	SW846 8270C
Dibenzofuran	ND	40	ug/L	SW846 8270C
Di-n-butyl phthalate	ND	40	ug/L	SW846 8270C
3,3'-Dichlorobenzidine	ND	500	ug/L	SW846 8270C
2,4-Dichlorophenol	ND	100	ug/L	SW846 8270C
Diethyl phthalate	ND	40	ug/L	SW846 8270C
2,4-Dimethylphenol	ND	100	ug/L	SW846 8270C
Dimethyl phthalate	ND	40	ug/L	SW846 8270C
4,6-Dinitro-2-methylphenol	ND	500	ug/L	SW846 8270C
2,4-Dinitrophenol	ND	300	ug/L	SW846 8270C
2,4-Dinitrotoluene	ND	100	ug/L	SW846 8270C
2,6-Dinitrotoluene	ND	100	ug/L	SW846 8270C
Di-n-octyl phthalate	32 J	40	ug/L	SW846 8270C
Fluoranthene	ND	40	ug/L	SW846 8270C
Fluorene	ND	40	ug/L	SW846 8270C
Hexachlorobenzene	ND	100	ug/L	SW846 8270C
Hexachlorocyclopentadiene	ND	500	ug/L	SW846 8270C
Hexachloroethane	ND	100	ug/L	SW846 8270C
Indeno(1,2,3-cd)pyrene	ND	40	ug/L	SW846 8270C
2-Methylnaphthalene	5.7 J	40	ug/L	SW846 8270C
2-Methylphenol	ND	100	ug/L	SW846 8270C
Naphthalene	3.0 J	40	ug/L	SW846 8270C
2-Nitroaniline	ND	100	ug/L	SW846 8270C
3-Nitroaniline	ND	100	ug/L	SW846 8270C
4-Nitroaniline	ND	100	ug/L	SW846 8270C
Nitrobenzene	ND	100	ug/L	SW846 8270C
2-Nitrophenol	ND	100	ug/L	SW846 8270C

(Continued on next page)

TESTAMERICA LABORATORIES, INC.
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Lot #: D9H200333
 Nationwide Environmental Services
 Stormwater
 Project Number: Trailer Services
 Date Reported: 8/31/09
 PAGE 3

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
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Client Sample ID: ST-1-02

Sample #: 002 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Semivolatile Organic Compounds by GC/MS				In Review
4-Nitrophenol	ND	100	ug/L	SW846 8270C
N-Nitrosodiphenylamine	ND	100	ug/L	SW846 8270C
N-Nitrosodi-n-propyl-amine	ND	100	ug/L	SW846 8270C
Pentachlorophenol	ND	500	ug/L	SW846 8270C
Phenanthrene	3.4 J	40	ug/L	SW846 8270C
Phenol	ND	100	ug/L	SW846 8270C
Pyrene	ND	100	ug/L	SW846 8270C
2,4,5-Trichloro-phenol	ND	100	ug/L	SW846 8270C
2,4,6-Trichloro-phenol	ND	100	ug/L	SW846 8270C
bis(2-Chloroisopropyl) ether	ND	100	ug/L	SW846 8270C
4-Methylphenol	ND	100	ug/L	SW846 8270C
Hexachlorobutadiene	ND	100	ug/L	SW846 8270C
Caprolactam	ND	100	ug/L	SW846 8270C
Atrazine	ND	100	ug/L	SW846 8270C
Carbazole	ND	40	ug/L	SW846 8270C

J Estimated result. Result is less than RL.

Client Sample ID: ST-1-03

Sample #: 003 Date Sampled: 08/20/09 16:00 Date Received: 08/20/09 Matrix: WATER

Inorganic Analysis				Reviewed
N-Hexane Extractable Material (1664A)	21	5.0	mg/L	CFR136A 1664A HEM

Colorado SEWER SERVICE, INC.

303-424-0448 • FAX 303-424-3775
6000 WEST 13TH AVENUE • LAKEWOOD, COLORADO 80214-2109
VIDEO INSPECTION REPORT

362⁵⁰

Service Tech: Richard R.

Customer Name: TRAILER SERVICE INC

Address: 2033 E. 58th Ave. Date: 9.25.09

Service For Address: _____

Phone Number: 303-295-7556

Pipe Access: 2- 4" Inlet + outlet
Sand trap Type of Pipe: cast
front of office

Pipe Length: only get 14' inlet 18' to main line from outlet

Offsets: _____

Roots: _____

Cracks: _____

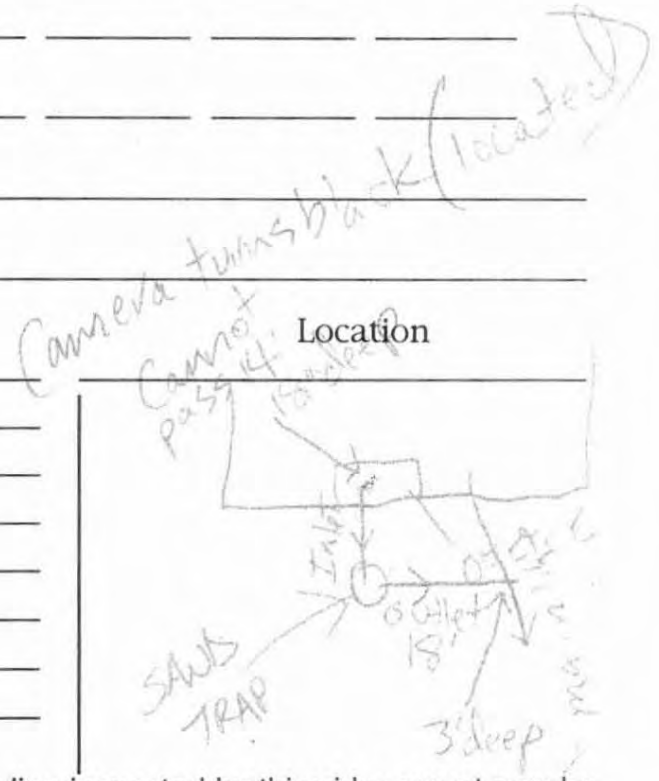
Damage: _____

Low Spots: _____

Overall Condition of Pipe: Inlet plugged
Outlet fine

Repairs Needed: _____

Notes:



Any further questions regarding the condition of the sewer line inspected by this video report may be forwarded to your local city sewer and sanitation department for a second opinion and assessment.

Do Not Write Above This Line

Work Order/Invoice

No 532145



SEWER SERVICE, INC.

6000 WEST 13TH AVENUE • LAKEWOOD, COLORADO 80214-2109 • 303-424-0448 • FAX 303-424-3775

Serviceman Henry / Jeremy D Date 1/26/09

Name Trailer Service Inc.

Address _____ Zip _____

Service For 2033 E 58th Ave

Account Number _____

Mgmt. Co. _____

Time In: 8:50 Time Out: 11:05

P.O. # _____ Second Opinion:

CASH CHECK # _____ ACCOUNT RE-OPEN N/C

C/C NO. _____ Exp. _____ Zip _____

Cause of Stoppage	Cleaned From	Line opened @ Approx	Footage	Is 2nd Opinion Needed
<u>Sand Drains</u>	<u>Manhole 4" Drain</u>	<u>14ft UOT</u>	<u>365'</u>	

Jelled man hole 360 00

line

Jelled 4" Drains in Front shop 100 00

Camera and back lines 150 00

45° @ 125' from manhole / open

Balance due upon receipt of invoice. Surcharge 5 00

Total 610 00

\$20.00 per month charge on overdue invoices.

\$25.00 charge on all returned checks

WARRANTY: 7 Days 30 Days 90 Days No Warranty: Abuse Damage

P 7 Day Warranty Only on Toilet Stoppages. Other _____

C *All other warranties valid providing there is no abuse or damage to a line.

R *Only one free cleaning on original warranty, on back-up, same line.

Colorado Sewer Service, Inc. is not responsible for damage due to pre-existing and unforeseen conditions such as broken pipe, plumbing code violations or lead piping, or problems encountered due to objects left in line or use of any method necessary to access problem lines. We also are not responsible for lack of communication between servicemen and customer, owner, or tenant. In addition, this serves as a Hold Harmless clause for any water damage done due to flooding before, during and after our services are rendered. In case of suit or collections be commenced to enforce payment of any sum, purchaser agrees to pay collections cost and/or attorney fees.

CUSTOMER SIGNATURE [Signature]

Phone#
Contact

PREVENTIVE MAINTENANCE NOW DUE ON:

Do Not Write Above This Line

Work Order/Invoice

No 532339



SEWER SERVICE, INC.

6000 WEST 13TH AVENUE • LAKEWOOD, COLORADO 80214-2109 • 303-424-0448 • FAX 303-424-3775

Serviceman Richard Rucker Date 9-25-08

Name Trailer Service Inc.

Address 2033 E. 58th Ave. Zip 80216

Service For _____

Account Number 3-295-7556

Mgmt. Co. _____

Time In: 12:30pm Time Out: 2:40pm

P.O. # _____ Second Opinion:

CASH CHECK # 01873 ACCOUNT RE-OPEN N/C

C/C NO. _____ Exp. _____ Zip _____

Cause of Stoppage	Cleaned From	Line opened @ Approx	Footage	Is 2nd Opinion Needed
<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>

CAMERA + LOCATE 275 00

EXIT LINE SAND

TRAP LOCATE 82 50

ENTER LINE WHERE

PLUGGED (SEE REPORT)

Balance due upon receipt of invoice. Surcharge 5 00

Total 367 50

\$20.00 per month charge on overdue invoices.

\$25.00 charge on all returned checks

WARRANTY: 7 Days 30 Days 90 Days No Warranty: Abuse Damage

P 7 Day Warranty Only on Toilet Stoppages. Other _____

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CUSTOMER SIGNATURE [Signature]

Phone#
Contact

PREVENTIVE MAINTENANCE NOW DUE ON: