



Certified Mail - Return Receipt Requested

November 7, 1989  
RO 89-244

Mr. Boyd Hamilton  
New Mexico Health and Environment Department  
1190 St. Frances Dr.  
Santa Fe, New Mexico 89503

Subject: Albuquerque Service Center  
NMD 000804294

Dear Mr. Hamilton,

This has been prepared in response to your letter of October 12, 1989. Please find enclosed responses to your comments, revised pages for the text and revised exhibits.

If you have any questions or require further information, please contact me on extension 2550.

Sincerely,

*Rob Omiecinski*

Rob Omiecinski  
Environmental Permit Writer

RO/dfs

cc: W. Johnson, Denver Reg. Mgr.  
Br. Mgr. (7-008-01)  
J. Lanahan

**SAFETY-KLEEN CORP  
ALBUQUERQUE, NEW MEXICO SERVICE CENTER  
RESPONSES TO COMMENTS DATED 10/12/89**

**Comment:**

1) Land Disposal Restrictions

According to information provided by Mr. Dave Rockwell, branch manager of the Albuquerque service center, the spent mineral spirits and associated sludge may be subject to land disposal restrictions due to presence of heavy metals and halogenated organic compounds. The application should be revised to reflect the appropriate certification/notification requirements. In addition, Mr. Rockwell indicated that there are additional packaging-related waste streams associated with the mineral spirits cleaner that are now sent to the recycle center. The application must identify the source, handling procedures and ultimate disposal for all waste streams.

**Response:**

This information has been added to section 2.5.

**Comment:**

2) Security

The security section must identify the message and visibility range (minimum 25 feet) of the warning signs.

**Response:**

This information is included in section 3.1.

**Comment:**

3) Inspections

The inspection section must address inspection procedures for the tank and paint waste shelter. Also, be sure to identify the frequency of inspection for all items.

**Response:**

Revised facility inspection records are enclosed and should be inserted into Appendix E.

**Comment:**

4) Personnel training

The plan must contain a brief description of how training will be designed to meet actual job tasks in accordance with the requirements of HWMR-5, as amended, Part V, 40 CFR sec. 264.16(a)(3).

**Response:**

This information is included in section 5.1 and Appendix G, Training Plan Outline For Branch Employees.

**Comment:**

5) Location standards

Seismic data meeting the requirements of Pt. V, sec. 264.18(a) and Pt. IX, sec. 270.14(b)(11)(ii)

**Response:**

This information has been requested and will be forwarded to your office upon receipt.

**Comment:**

6) Map

The map submitted is missing the following items required by Pt. IX, sec. 270.14(b)(19):

- a) date map was prepared (not date of photographs on which map is based);
- b) surrounding land uses;
- c) legal boundaries of the facility;
- d) access control
- e) injection and withdrawal wells, both on and off-site;
- f) all items required by Pt. IX, sec. 270.14(b)(19)(x).

**Response:**

The above information is included in the enclosed map.

**Comment:**

7) Preparedness and prevention

The application must demonstrate the availability of water at adequate volume and pressure to supply water hose streams, as required by Pt. V,

sec. 264.32(d). Also, provisions for testing of equipment must be provided, as required by Pt. V, sec. 264.33.

**Response:**

This information has been requested of the Albuquerque Water Department and will be forwarded to your office upon receipt. Also, the frequency of testing the safety equipment is included in Section 3.2.e.

**Comment:**

8) Contingency plan

- a) Demonstrate how the emergency coordinator will be available or on call at all times, as required by Pt. V, sec. 264.55. A home phone number is not acceptable as the sole means of contacting the coordinator.

**Response:**

The emergency coordinator will be available at all times by phone or pager.

**Comment:**

- b) A list of emergency equipment must be provided in the plan, as required by Pt. V, sec. 264.52(e).

**Response:**

An emergency equipment list is enclosed and should be inserted into Appendix F.

**Comment:**

- c) The plan must describe the arrangements agreed to by local authorities in the event of an emergency, as required by Pt. V, sec. 264.52(c). The letters provided do not meet this requirement.

**Response:**

A copy of the letter that acknowledges receipt of the Contingency Plan for the fire and police departments is enclosed. Also, certified mail receipts proving receipt of the Contingency Plan by the local authorities are enclosed.

**Comment:**

- d) The plan must contain an evacuation plan meeting the requirements of Pt. V, sec. 264.52(f).

**Response:**

An evacuation diagram is enclosed.

**Comment:**

9) Closure plan

The closure plan must contain an estimate of the maximum inventory of waste ever on-site during the life of the facility, as required by Pt. V, sec. 264.112(b)(3).

**Response:**

All waste units to undergo closure and their maximum capacities are listed in the Closure Plan Abstract.

**Comment:**

10) Financial assurance for facility closure

The financial assurance documentation must be updated. The cost estimate for closure is nearly \$35,000, but the financial assurance section contained in the original application is based on a cost of \$20,000 per service center.

**Response:**

The financial assurance documentation has been updated and should be inserted into Appendix H. A cost estimate for closure is now estimated at \$50,000 per service center.

**Comment:**

11) Container storage

- a) The application must show that ignitable wastes in containers are stored at least 50 feet from the facility property line, as required by Pt. V, sec. 264.176.

**Response:**

This information has been added to section 3.3.2.

**Comment:**

**12) Tank Storage**

- a) The application must demonstrate compliance with Pt. V, sec. 264.198(b) for maintenance of protective distances from streets, alleyways, etc.

**Response:**

This information has been added to section 3.3.1.

**Comment:**

- b) The application identifies the spent mineral spirits tank as a double-walled tank. According to Mr. Rockwell, the tank is single walled, without secondary containment. Therefore, a contingent closure plan, post-closure care plan, and cost estimate for contingent closure are required (Pt. V, sec. 264.197(c)). We hope that an error of this gravity is not indicative of the overall accuracy of the information in the application. Please review your submission to be sure that Safety-Kleen's "generic application" approach has not resulted in additional errors.

**Response:**

The application was amended to reflect the tanks which are to be installed. The contingent closure plan, post-closure care plan, and cost estimate for contingent closure documentation for the current single-walled tank is enclosed.

**Comment:**

- c) According to Mr. Rockwell, a 1200-gallon mineral spirits sludge tank was removed in 1982. Please provide all available documentation on the previous location of this tank, the removal procedures employed and any sampling results.

**Response:**

According to Mr. Ray Karass, the project engineer at that time, the sludge tank was thoroughly cleaned and the sludge was placed into drums. These drums were shipped to our Denton Recycle Center for proper disposal. The tank itself was also scrapped.