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SAFETY-KLEEN CORPORATION INSPECTION REPORT

Date of Report: November 14, 1989
Date of Inspection: November 7, 1989
Facility: Safety-Kleen Corp. - Albuquerque
Service Center
EPA ID Number: NMD000804294
Location: 2720 Girard NE, Albuquerque
Facility Contact: Dave Rockwell, Branch Manager
Notification Status: Generator/TSD Facility and Transporter
Type of Inspection: Compliance Evaluation Inspection (CEI)
Participants: Coby Muckelroy, Pat Ringgenberg, and
Nick Van Kleeck, NMEID
Dave Rockwell, Safety-Kleen
Weather: Sunny 40's-60's
Time In: 8:10 a.m.
Time Out: 5:40 p.m.

*See files for complete
review of inspection*

INTRODUCTION

This inspection was conducted as a routine Compliance Evaluation Inspection (CEI). CEI's are generally done annually at TSD facilities. The last such inspection of this facility occurred on January 5, 1988. Several violations were discovered during the current inspection and are discussed below.

NATURE OF BUSINESS AND WASTES GENERATED

Safety-Kleen Corporation is an international company which provides solvent and cleaning products to its customers and reclaims those products for re-use by the same customers. The company transports the products to its customers and picks up the wastes from them. Solvents are supplied to auto repair and industrial maintenance clients for parts cleaning, and to drycleaners for drycleaning. Safety-Kleen's Albuquerque Service Center stores the hazardous wastes prior to shipping them to one of the company's reclamation facilities located in Denton, Texas.

The Albuquerque Service Center has been operating at its current location since 1977, and services a large portion of the state. The facility employs seven people, including four sales representatives, one warehouseman, one secretary, and the branch manager. An annual average of about 200,000 gallons of solvent are stored at the Albuquerque Service Center in route to the Denton reclamation facility. The Albuquerque facility is approximately a one million dollar per year business.

Hazardous wastes received at the Albuquerque facility include waste petroleum naphtha (D001) which is used as a parts washing and degreasing agent, methylene chloride and cresylic acid compound (F002, F004) which is used as a carburetor cleaner, and perchloroethylene (F002) which is used as a cleaning solvent by drycleaners. The waste naphtha also contains varying quantities of lead and cadmium (D006 and D008) through contamination during the cleaning processes of customers.

Hazardous waste management areas include a 12,000 gallon underground storage tank (installed in 1977) for storing waste naphtha, a drain and fill station next to the tank, and a container storage area in the warehouse for storage of drycleaning wastes and spent carburetor cleaner. The drain and fill station consists of a wet dumpster with metal pails on the bottom to collect sludge and solids from the naphtha. The liquid portion flows over the pails and into a drainage pipe

connected to the tank. The sludges and solids from the pails and the tank bottoms primarily contain the lead and cadmium contaminants. The drain and fill station is also used to fill containers with product naphtha from an underground product tank next to the waste tank.

The container storage area inside the warehouse used to store the drycleaning and carburetor cleaning wastes contains sixteen and thirty gallon drums. The drycleaning wastes, which include filter cartridges, filter powder, and still residues, and the carburetor cleaner waste are usually stored and then shipped to the Denton facility in the same containers that they are received. The waste naphtha is received in drums, then it is dumped into the wet dumpster leading to the tank. Drum liners, which are caught by a grate, and the sludge and sediments caught in the pails are drummed as needed and sent to Denton. A tank truck periodically pumps out the naphtha and tank bottoms from the storage tank for shipment to Denton.

RESULTS OF INSPECTION

The inspection consisted of a brief entrance conference, a facility tour of the entire property with an emphasis on the hazardous waste management areas, a records review of manifests and required documentation and plans, and a brief exit conference concerning the preliminary findings.

The following violations were noted:

1. The facility personnel training program is directed by a person who has insufficient documentation of his formal training in hazardous waste management procedures. This trainer apparently has not had any formal training since 1985. Failure to demonstrate that the trainer is adequately trained in hazardous waste management procedures is a violation of HWMR-5, Part VI, 40 CFR section 265.16(a)(2).
2. One employee has not had training within six months of being hired. This is a violation of HWMR-5, Pt. VI, sec. 265.16(b).
3. The apparent refusal by the local police and hospital to enter into arrangements as provided in HWMR-5, Part VI, sec. 265.37 has not been documented in the facility's operating record. This is a violation of HWMR-5, Part VI, sec. 265.37(b).

4. Two drums containing a small amount of liquid waste naphtha and sludge were being stored open next to the drain and fill station. This is a violation of HWMR-5, Part VI, sec. 265.173(a).

5. Containers holding ignitable waste (naphtha) are located within fifty feet of the facility property line. This is a violation of HWMR-5, Part VI, sec. 265.176.

6. The facility closure plan does not contain an estimate of the expected year of closure as required by HWMR-5, Part VI, sec. 265.112(b)(7).

In addition to the above violations, two deficiencies regarding the land disposal restriction requirements were noted. The facility's waste analysis plan has not been revised in accordance with 265.13(b)(6) to reflect requirements under 268.7. Also, several of the manifests for shipments of restricted waste from the Albuquerque facility to the Denton facility had no notifications with the manifests. Since the authorized state program does not include the land disposal regulations, these deficiencies will have to be referred to EPA.

RECOMMENDED ACTION

Safety-Kleen should be sent a Notice of Violation (NOV) letter informing it of the violations cited as a result of the inspection. A date of compliance is to be required of Safety-Kleen. The land disposal restriction violations must be referred to EPA.

On

INSPECTION CHECKLIST SYSTEM

Inspection Date: 11/07/89
 Name of Facility: SAFETY-KLEEN CORP.-ALBUQUERQUE
 Mailing Address: 2720 GIRARD NE
 State: NM ZIP: 87107

Inspector's Initials: CGM

EPA ID: NMD000804294

Facility Address: SAME
 State: ZIP:

Facility Owner: SAFETY-KLEEN CORP.

Phone Number: (505)884-2277

Description of Facility: INTERIM STATUS STORAGE FACILITY

Type of Ownership: Federal State County Municipal Private X

Did facility request a copy of the report? YES

HW Activities: Generator X Transporter X Treatment
 Disposal Storage X

Type of Inspection: Lead Overview SPMS Commitment
 CEI X CME Land Ban LOIS Sampling
 Case Development RFA Operation and Maintenance

Inspection Participants: (name and phone number)

EPA Inspector(s):

State Inspector(s): COBY MUCKELROY, PAT RINGGENBERG

Facility Representative(s): DAVE ROCKWELL

Checklists Completed:

X Generator	Waste Piles	Thermal Treatment
X TSD	X Closure	Chemical, Physical and
X Tanks	Post Closure	Biological Treatment
X Containers	Incinerator	Surface Impoundments
Landfill	Land Treatment	Generator Supplement
X Transporter	Groundwater	Attachments
X Land Ban	CME	Photographs
LOIS	O and M	Other

Apparent violations noted during outbriefing:

INADEQUATE PERSONNEL TRAINING, LOCAL AUTHORITIES REFUSAL NOT DOCUMENTED IN OPERATING RECORD, OPEN CONTAINERS, IGNITABLE WASTE STORED WITHIN 50 FT. OF PROPERTY LINE.