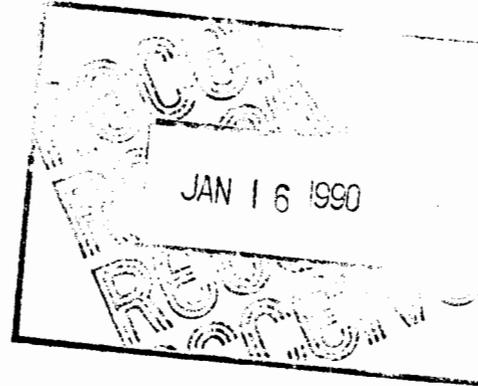




January 08, 1990  
JL90-08

Mr. Coby Muckelroy  
Environmental Improvement Division  
N.M. Health and Environment Department  
Harold Runnels Building  
1190 St. Francis Dr.  
Santa Fe, NM 87503



RE: Safety-Kleen - Albuquerque, NMD000804294

In my letter to you of December 4, 1989 I outlined our responses to alleged deficiencies noted in your letter of November 17, 1989. Our follow-up telephone conversation revealed that you were in need of further information regarding a few of those responses. It is my intention that this letter provides that information.

1. The facility's personnel training director has insufficient documentation of his own training -

My earlier letter outlined our facility manager's qualifications for the work he does. Enclosed with this letter is a standard outline of the information to which he is exposed on a quarterly basis. We will begin to use this outline as a training documentation format.

2. Two drums containing small amounts of liquid were standing unsealed at the time of inspection -

As explained previously, this is not a routine occurrence, and is directly in violation of Safety-Kleen Corporate policy. The contents of those drums were flushed through the facility's wet dumpster system to the waste storage tank. The drums were rinsed and reused as per normal facility procedure.

*see file*

## BRANCH MANAGER TRAINING

Program for Regional Engineer branch visit -

Review of Environmental Notebook/Part B Permit

- Part A Application
- Waste Analysis Plan
- Contingency Plan
- Financial Requirements
- Training Plan
- Transportation Licensing

Review of Environmental Compliance Guidance and Corporate Policy Manual

- Tranship Labels
- Land Ban Notifications
- Spill Reporting
- Preparation for Agency Inspections

Conduct Detailed Facility Inspection with Branch Manager

- Identify deficiencies requiring branch attention
- Identify problems requiring Technical Services assistance
- Review actual vs. permitted waste storage capacities

File Review

- Manifests and Land Ban Notices
- Training Files
- Spill Report File
- Community Right-to-Know Files
- Inspection Records

Contingency Plan Training Session with Branch Manager and All Alternate Emergency Coordinators

- Include Spill Simulation and Response
- Update the Emergency Information and Local Authority Notifications

Health and Safety

- OSHA 200 Reporting
- Hazard Communication Program

Review Branch Specific Manifesting Procedures and Customer ID # Compliance