

PRC Environmental Management, Inc.



Planning Research Corporation

January 15, 1990

Mr. Jon Rinehart
U.S. EPA Region VI
1445 Ross Avenue
Suite 1200
Dallas, TX 75202

Re: RCRA Work Assignment 041-R260304
List of Potential Solid Waste Management Units
Safety Kleen Corporation NMD000804294

Dear Mr. Rinehart:

The preliminary list of potential solid waste management units and general facility questions is enclosed for the Safety Kleen Corporation of Albuquerque, New Mexico to be inspected in the week of February 12, 1990.

A draft transmittal letter to notify the facility about the planned visual site inspection has also been included for your reference. If you have any questions or comments, please contact me at (214) 754-8765.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel T. Chow". The signature is stylized and cursive, written over a horizontal line.

Daniel T. Chow

DTC/

enclosure

cc: Tom Clark, U.S. EPA Region VI (letter only)
Barry Sims, PRC

Plant Manager

Re: RCRA Facility Assessment Visual Site Inspection
Safety Kleen Corporation (NMD000804294)

Dear XXXXX:

In preparation for the visual site inspection (VSI) to be conducted at the Safety Kleen Corporation facility in the week of February 12, 1990, please find the enclosed list of potential solid waste management units (SWMUs) to be inspected by PRC Environmental Management, Inc. (Attachment I).

The purpose of the VSI is:

- (1) to identify SWMUs;
- (2) to assess the potential for release of hazardous constituents from SWMUs and other areas of concern; and
- (3) to evaluate the need for further action.

A review of file materials at EPA Region VI and at the New Mexico Environmental Improvement Division (NMEID), was conducted prior to developing the enclosed attachments. The file review included RCRA and CERCLA permit documents. The principal source of information used in this preliminary list was EPA Part B Permit Applications and subsequent revisions. General correspondence was also relied upon to identify potential SWMUs and any areas of concern.

The inspection team will need to see the potential SWMUs and any areas of concern identified in Attachment I during the site visit. Because the list of SWMUs is based upon review of file information which may not be complete, it would be beneficial for Safety Kleen Corporation to address the prepared request for general information (Attachment II) prior to the site investigation. The team will revise the list of SWMUs based on your responses and the site inspection. A fact sheet will be prepared for each SWMU as shown in Attachment III. Your cooperation and assistance in compiling this information will help expedite the inspection process.

Members of the inspection team will be:

PRC Environmental Management, Inc. - Barry Sims
PRC Environmental Management, Inc. - Jeff Forbes
U.S. EPA Region VI

If you have any questions, please contact me at (214) 655-6790.

Sincerely,

ATTACHMENT I

**SAFETY KLEEN CORPORATION
ALBUQUERQUE, NEW MEXICO
(NMD000804294)**

POTENTIAL SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	Identification of Potential SWMUs
1	12,000 Gallon Underground Storage Tank for Spent Solvent
2	Container Storage Area
3	Return and Fill Station
4	Paint Waste Shelter
5	1,500 Gallon Underground Storage Tank for Sludge (inactive)

Sources: Part B Permit Application, Safety Kleen Corp., November 7, 1989.
Notification of Underground Storage Tanks, May 1, 1986.
Hazardous Waste Tank Integrity Assessment, TERA, Inc., April 1988.

ATTACHMENT II
SAFETY KLEEN
ALBUQUERQUE, NEW MEXICO
(NMD000804294)

REQUEST FOR ADDITIONAL FACILITY INFORMATION
PRIOR TO THE VISUAL SITE INSPECTION

Please review your files and provide the following information requests prior to the Visual Site Inspection (VSI) scheduled for the week of February 12, 1990.

- 1) Please provide any available current and/or historic aerial photographs of the facility.
- 2) Please provide a full size site plan of the facility that shows the following: (a) the location of all existing, inactive, and all listed potential SWMUs, including the abandoned 1500 gallon sludge tank; (b) the location and type of all underground utilities including piping associated with the underground storage tanks; (c) topographic and surface drainage features; and (d) location of all structures at the facility.
- 3) Please provide information on the depth to ground water, direction of ground-water flow, and the location of all municipal and private water wells within a one-mile radius of the facility.
- 4) The file documents reviewed at the New Mexico Environmental Improvement Division (NMEID) Ground Water and Hazardous Waste Bureau contained a report titled "Hazardous Waste Tank Integrity Assessment," dated April, 1988. Appendix B of the report includes a cost proposal for installation of the existing 12,000 gallon storage tanks at the current facility location. The proposal also includes a bid item for the removal of two 10,000 gallon tanks at a former facility location on 3209 "C" Matthew N.E. Please provide a detailed account of past history including installation date, tank type, type of waste or product stored, last date of use by Safety Kleen Corporation, date of decommissioning or removal, current ownership and status (if tanks still exist) for these two underground tanks.
- 5) What was the reason for removing the 1500 gallon sludge tank from service? Please furnish any available documentation, such as analytical results from soil sampling or photographs of excavation and tank, that might indicate that no discharge into the environment occurred from this SWMU.
- 6) Provide information concerning any on-site spills or leaks which have occurred at the facility throughout the company's history. This should include any equipment and areas used to handle raw materials, products and waste media.
- 7) What are the maximum number of drums allowed in the container storage areas?
- 8) Please provide any other additional information that might assist in the timely completion of this assessment.

ATTACHMENT III

**SAFETY KLEEN CORPORATION
ALBUQUERQUE, NEW MEXICO
(NM000804294)**

POTENTIAL SOLID WASTE MANAGEMENT UNITS (SWMUs)

Number: (SWMU No. _____)

Name: (Identification of SWMU)

Unit Characteristics: (General description including location, dimensions, SWMU components, construction material, secondary containment, etc.)

Operational History: (Dates of operation and any operational permits or permit applications.)

Current Status: (Active, inactive, physically closed, approved closed, or certified closed.)

Waste Characteristics: (Description of types, volumes, and hazardous or non-hazardous characteristics of waste media.)

Waste Management: (Description of handling treatment, storage, and disposal practices. Include names and addresses of disposal facilities used.)

Release History: (Visual evidence or reports of releases of hazardous material. Include associated dates and any regulatory actions taken.)

Potential Pathways: (Potential migration pathways such as air, surface, water, ground water, soil or subsurface gas.)

Exposure Potential: (Location and use of nearby water wells, surface water, etc., that are potential human and environmental receptors of releases.)

Remedial Action: (Description of any remedial action undertaken as a result of past releases. Include dates and types of remediation performed and waste media disposition.)