



Certified Mail - Return Receipt Requested

March 15, 1990
RO 90-161

Dr. Elizabeth Gordon
New Mexico Health and Environment Department
1190 St. Francis Drive
Santa Fe, New Mexico 89503

Subject: Albuquerque Service Center
NMD 000804294



Dear Dr. Gordon,

During a recent inspection by your department at the subject facility, it was noted that Safety-Kleen must demonstrate that changes made to an interim status hazardous waste management facility do not exceed fifty percent of the capital cost of a comparable, entirely new facility.

According to the code of federal regulations 270.72(b) as amended on March 7, 1989, changes made solely for the purpose of complying with the requirements of 40 CFR 265.193 for tanks and ancillary equipment may be made even if the changes amount to a reconstruction. Safety-Kleen believes that a new return and fill station (ancillary equipment) and double-walled tanks are necessary to (1) prevent a threat to human health or the environment and (2) comply with 40 CFR 265.193. The total cost of installation of the new return and fill station and the 12,000 gallon underground double-walled tank is \$85,000.

An additional container storage area located within the warehouse will be used to store spent immersion cleaner (F002, F004) and dry cleaning waste (F002). This increase in capacity is directly related to the increase in the number of customers serviced. As the land ban and small quantity generator regulations have come into effect, the number of customers serviced by Safety-Kleen has increased substantially and the amounts of wastes received have likewise increased. The total cost of improvement is \$20,000.

Safety-Kleen will also utilize a flammable storage shelter for the storage of paint waste (D001, D006, D007, D008, F003 and F005) and dumpster sediment (D001, D006 and D008). The location of this unit is depicted on the site plan. Safety-Kleen purchased additional property to satisfy the fifty foot buffer zone requirement for the storage of ignitable wastes. The cost of installation of this unit is \$25,000.

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The total cost improvement for this facility amounts to \$130,000, which is considerably less than fifty percent of a comparable, entirely new facility (\$470,000).

Safety-Kleen believes there is a lack of available treatment, storage and disposal facilities in the Albuquerque area for the wastes it intends to store. The vast majority of Safety-Kleen's customers are small quantity generators for whom economical treatment, storage and disposal methods are limited. These generators produce approximately ten gallons of waste per month, an amount that is cumulatively substantial but, for the individual, is difficult and expensive to dispose of.

For the above reasons, Safety-Kleen believes it should be allowed to operate the flammable storage shelter, additional drum storage area, proposed return and fill station and double-walled underground storage tanks and the increase in design capacity should be approved. A revised Part A Application indicating the proposed changes was sent to your office September 11, 1989. Your attention to this matter is greatly appreciated. If you have any questions, please contact me on extension 2550.

Sincerely,



Rob Omiecinski
Environmental Permit Writer

RO/dfs

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