

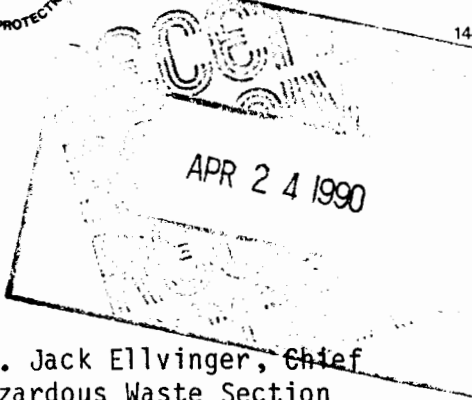


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

April 20, 1990



Mr. Jack Ellvinger, Chief
Hazardous Waste Section
Groundwater and Hazardous Waste Bureau
Environmental Improvement Division
New Mexico Health and Environment Department
P. O. Box 968
Santa Fe, New Mexico 87504-0968

Dear Mr. Ellvinger:

Enclosed you will find a copy of the following RCRA Facility
Assessment (RFA) report:

° Facility Name: Safety Kleen Corp.

° EPA ID Number: NMD000804294

Additional information will be forwarded to you as it becomes
available. If you have any questions, please contact me or have your
staff contact Bill Gallagher at (214) 655-6775.

Sincerely yours,

William K. Honker
William K. Honker
Chief
RCRA Permits Branch

Enclosure

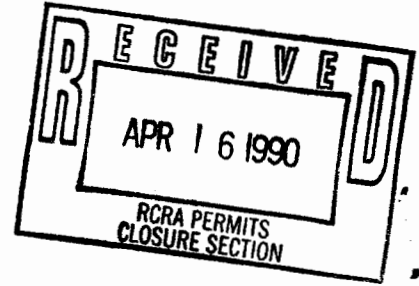
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prc

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**SAFETY-KLEEN CORPORATION
NMD 000804294
ALBUQUERQUE, NEW MEXICO**

RCRA FACILITY ASSESSMENT REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue
Dallas, Texas 75202**

Prepared By:

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EPA Contract No. 68-W9-0041

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DISCLAIMER

This report was prepared for the U.S. Environmental Protection Agency (EPA), Region 6, by PRC Environmental Management, Inc., in fulfillment of Contract No. 68-W9-0041, Work Assignment No. R260304. The opinions, findings, and conclusions expressed herein are those of the contractor and not necessarily those of the EPA or other cooperating agencies. Mention of company or product names is not to be construed as an endorsement by the EPA.

This document is intended to assist EPA and State personnel in developing requirements for an owner or operator of a facility regulated by the Resource Conservation and Recovery Act (RCRA) to conduct a RCRA Facility Investigation (RFI) pursuant to 40 CFR 264. EPA will not necessarily limit the RFI or other requirements to those that correspond with the recommendations set forth herein. EPA and State personnel must exercise their technical judgment in using the RCRA Facility Assessment report as well as other relevant information in determining what RFI or other requirements to include in a permit or order.

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) conducted a RCRA Facility Assessment (RFA) of Safety-Kleen Corporation's Albuquerque Service Center. The RFA had two components: a preliminary review (PR), followed by a visual site inspection (VSI). The RFA is conducted to determine the current facility operating status, identify existing solid waste management units (SWMU), assess the regulatory compliance of those units, and assess potential releases to the environment from those units.

Safety-Kleen Corporation is an international company which provides solvent and cleaning products to its customers and reclaims those products for reuse by the same customers. The company transports the products to its customers and picks up the spent materials from them. Safety-Kleen supplies solvents to automobile repair and industrial maintenance businesses for parts cleaning, and to dry cleaners. The Albuquerque Service Center is currently operating under interim status as a transporter and storage facility. Spent solvent wastes are stored at the Albuquerque Service Center prior to shipping them to Safety-Kleen Corporation's solvent reclamation facility in Denton, Texas.

The Albuquerque Service Center began operating at its current location on March 1, 1977. Hazardous wastes received at the Albuquerque Service Center include: (1) spent petroleum naphtha or mineral spirits (D001), (2) spent immersion cleaner containing chlorinated solvents and cresylic acid (F002, F004), (3) dry-cleaning wastes containing perchloroethylene, mineral spirits, and trichloro-trifluoroethane (F002), and (4) dumpster sediments which exhibit the same characteristics as the mineral spirits (D001) and contain varying quantities of lead and cadmium (D006, D008).

PRC identified four SWMUs, three active and one inactive, during the PR and VSI. The three active SWMUs consist of (1) a 12,000-gallon underground storage tank (UST) for spent mineral spirits, (2) a solvent return-and-fill station where spent mineral spirits are emptied from 16- and 30-gallon drums into a wet dumpster which drains into the UST, and (3) a container storage area where 16- and 30-gallon drums of dumpster sediments and dry cleaning wastes are accumulated. The inactive SWMU consists of a 1,500-gallon UST. This SWMU was used as a sedimentation basin for accumulation of bottom sediments from March 1, 1977 until February 1, 1983. PRC obtained conflicting information during the PR and VSI concerning the status of this SWMU. File correspondence and verbal communication with the Albuquerque Service Center Branch Manager, Mr. David Rockwell, indicate that the tank was removed in 1983. However, the New Mexico Environmental Improvement Division UST registration records indicate that the tank was filled with sand and left in place in 1983. PRC bases the conclusions and

recommendations made in this report on the assumption that the UST is filled with sand and left in place.

PRC recommends a RCRA Facility Investigation (RFI) for the 1,500-gallon underground storage tank for spent solvent sludge. The RFI should be designed to determine whether this unit was clean-closed. If the 1,500-gallon UST was removed in 1983, as claimed by the Albuquerque Service Center Branch Manager, proof of its removal and disposal should be provided. PRC also recommends that the Albuquerque Service Center furnish documentation on the proposed removal and replacement of the two existing USTs. The documentation should certify that no subsurface contamination has resulted from their operation. PRC recommends no further action for the solvent return-and-fill station or for the container storage area.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. 26, Project No. 39 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0041. This work assignment is to provide technical support on a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) of Safety-Kleen Corporation's facility in Albuquerque, New Mexico (Albuquerque Service Center).

1.1 PURPOSE OF THE RCRA FACILITY ASSESSMENT

The RFA is designed to identify environmental releases or potential releases from solid waste management units (SWMUs) that may require corrective action. The RFA is the first step in a process for implementing the corrective action provisions in the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA. Specifically, Sections 3004(u), 3004(v), and 3008(h) grant to the EPA authority to take initiate corrective action for releases of hazardous wastes and constituents from SWMUs at RCRA-regulated facilities. An RFA generally consists of three steps: preliminary review (PR), visual site inspection (VSI), and sampling visit (SV). A sampling visit is conducted only when available information is insufficient to support a recommendation for an RFI. The RFA at the Albuquerque Service Center did not include an SV.

The PR and VSI are intended to

- Evaluate existing information on hazardous waste releases or potential releases.
- Identify all SWMUs and potential release pathways.
- Screen from further investigation those SWMUs that pose no threat to human health or the environment.
- Determine the need for further action, such as an RFI.

An RFA is required for facilities that manage hazardous wastes. The RFA was performed at the Albuquerque Service Center to determine whether there have been, or are likely to be, releases of hazardous wastes or hazardous constituents that will require further investigation.

Both clean and spent solvents are transported between the warehouse and the customer's business in either 16- or 30-gallon covered drums. Spent mineral spirits are emptied from the drums into an underground storage tank (UST); spent chlorinated solvents are kept in a container storage area within the warehouse. Safety-Kleen Corporation transports all the spent solvents to its regeneration facility in Denton, Texas. The spent mineral spirits are transported in bulk tank trucks, and the spent chlorinated solvents are transported in covered drums.

2.1 SITE LOCATION

The Albuquerque Service Center is located at 35° 06' 44" north latitude and 106° 36' 46" west longitude in the City of Albuquerque, Bernalillo County, New Mexico. The site is bordered on the east by the Albuquerque Metropolitan Arroyo Flood Control Authority (AMAFCA) North Diversion Channel, on the west by Girard Boulevard, and on the north and south by commercial and light industrial development. Figure 1 is an area location map. General facility data are provided below.

Facility Address:	Safety-Kleen Corporation 2720 Girard N.E. Albuquerque, New Mexico 87107
Facility Contact:	Mr. Jay Lanahan Regional Environmental Engineer Safety-Kleen Corporation 1580 Industrial Drive Missouri City, Texas 77459
Telephone:	(713) 261-0429
EPA I.D. Number:	NMD000804294

2.2 FACILITY OPERATIONS AND HAZARDOUS WASTE MANAGEMENT

The Albuquerque Service Center operates as a RCRA-regulated generator, accumulation point, and transporter of recyclable hazardous wastes. The Albuquerque Service Center offers two services to its customers: (1) supply of clean solvent for parts cleaning and collection, with recycling of spent solvents, and (2) dry-cleaning waste collection and recycling. Four types of hazardous wastes are generated from servicing customers and maintenance of the service center. Table 1 provides a list of the waste types managed at Albuquerque Service Center. The remainder of this subsection describes the on-site waste management practices for each waste type.



SITE LOCATION MAP

Source: City of Albuquerque Public Works Department

SAFETY-KLEEN CORPORATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

FIGURE 1

TABLE 1

HAZARDOUS WASTES MANAGED AT THE ALBUQUERQUE SERVICE CENTER

<u>Storage Unit</u>	<u>Waste Material</u>	<u>U.S. EPA Hazardous Waste Code</u>
Underground Storage Tank	Spent mineral spirits (petroleum naphtha)	D001
Underground Storage Tank	Bottom sediments containing lead, cadmium, and spent mineral spirits	D001, D006, D008
Container Storage Area	Dumpster sediments Spent immersion cleaner Dry cleaning wastes	D001, D006, D008 F002, F004 F002

Spent mineral spirits are collected from the customer's facility in 16- and 30-gallon drums. Due to the customer's cleaning processes, the spent mineral spirits accumulate varying quantities of suspended sediments that contain lead and cadmium (D006 and D008). The drums are transported to the Albuquerque Service Center and emptied into a dumpster at the solvent return-and-fill station. The dumpster then empties into a 12,000-gallon spent mineral spirits solvent UST. This waste handling generates three types of wastes: (1) spent mineral spirits solvent, (2) dumpster sediment, and (3) bottom sediment in the UST.

Spent immersion cleaner is collected from the customer's facility in gray 16-gallon drums, then transported to the Albuquerque Service Center. The spent immersion cleaner contains chlorinated solvents and cresylic acid. Each 16-gallon drum contains about 4.5-gallons of spent solvent (about 1/4 full); the drums are stored in the drum storage area of the warehouse.

Dry-cleaning wastes are packaged on the customer's premises in gray 16-gallon drums and lined boxes. The dry-cleaning wastes are in the form of (1) spent filter cartridges, (2) powder residue from diatomaceous or other powder filter systems, and (3) still bottoms. They contain perchloroethylene, mineral spirits, and trichloro-trifluoroethane. The drums and lined boxes are

transported to the Albuquerque Service Center and are stored in the container storage area of the warehouse.

All accumulated wastes are shipped periodically from the Albuquerque Service Center to Safety-Kleen Corporation's recycling center in Denton, Texas.

2.3 REGULATORY STATUS

This subsection summarizes the regulatory history of the Albuquerque Service Center and its current status under RCRA.

The Albuquerque Service Center submitted a Notification of Hazardous Waste Activity to the EPA on August 18, 1980. On November 18, 1980, the facility submitted a RCRA Part A permit application to the EPA. The Part A permit application stated that the Albuquerque Service Center was a Treatment, Storage, and Disposal facility (TSD) and a Transporter. On April 6, 1981, the Albuquerque Service Center submitted a "Petition for Clarification or Modification of Regulation" to the EPA. In its petition, the Albuquerque Service Center asserted that its solvents were not solid wastes, since they were being beneficially reused. The EPA issued a letter on July 2, 1981, stating that non-listed hazardous wastes are not subject to RCRA-regulation if they are being beneficially recycled or stored for recycling. On August 9, 1982, EPA granted interim status to the Albuquerque Service Center for container storage of spent solvents. On August 11, 1982, the Albuquerque Service Center submitted an amended Notification of Hazardous Waste Activity and a Part A application from which transportation, treatment, storage and disposal had been deleted.

On June 28, 1982, the EPA submitted a Notice of Violation (NOV) to the Albuquerque Service Center. The EPA listed 14 RCRA violations that were identified during a February 8, 1982, inspection by EPA personnel. One violation cited the need for remedial action to clean-up an area of soil contamination next to the solvent return-and-fill station. The Albuquerque Service Center responded to EPA's NOV by excavating approximately 12 cubic yards of contaminated soil and constructing a concrete catchment to contain future spills. The EPA accepted the remediation, and no further regulatory actions were taken.

On January 4, 1985, the Final Rule redefining solid waste was published in the Federal Register. The new definition subjected hazardous wastes intended for beneficial use, re-use, or recycling to 40 Code of Federal Regulations (CFR), Parts 262, 263, 264, 265, and 270, if the waste is a mixture containing a listed hazardous waste. In response to the revised definition of solid waste, the Albuquerque Service Center submitted an amended Notification of Hazardous

Waste Activity to the EPA on April 3, 1985. The notification included treatment, storage, disposal, generation, and transportation.

On May 6, 1985, the NMEID requested the Albuquerque Service Center to submit a RCRA Part A application. On July 2, 1985, the Albuquerque Service Center submitted a revised RCRA Part A permit application to the EPA and the NMEID. The waste management units listed in the permit application included a 12,000-gallon UST and a container storage area for accumulation of up to 2,592 gallons. Table 1 shows the types of hazardous wastes managed by the Albuquerque Service Center and listed in the RCRA Part A permit. On September 22, 1987, the Albuquerque Service Center submitted a RCRA Part B permit application to the NMEID (Safety-Kleen Corporation, 1988). In response to comments made by the NMEID on October 12, 1989, the Albuquerque Service Center submitted revisions to its RCRA Part B permit application on November 7, 1989 (Safety-Kleen Corporation, 1989b).

The Albuquerque Service Center is currently seeking EPA and NMEID approval for the RCRA Part B permit application. The RCRA Part B permit application includes the following proposed modifications to the facility.

1. Construction of a new solvent fill and return station
2. Replacement of existing USTs (both product and spent solvent tanks) with double wall tanks
3. Additional container storage areas for existing and proposed waste streams
 - a. spent immersion cleaner (F002, F004)
 - b. dry cleaning waste (F002)
 - c. dumpster sediment (D001, D006, D008)
 - d. paint waste (D001, D006, D007, D008, F003, F005)

3.0 ENVIRONMENTAL SETTING

This section describes the environmental setting of the Albuquerque Service Center. This information provides a basis for evaluating potential impacts on human health and the environment resulting from existing or potential releases of hazardous materials from SWMUs identified at the Albuquerque Service Center. The following subsections describe the surface water, geology and soils, and hydrogeology of the site.

3.1 SURFACE WATER

There are no permanent surface water features within or adjacent to the site. The site is bordered on the east by the concrete-lined AMAFCA North Diversion Channel, which conveys storm-water runoff from watersheds on the west face of the Sandia Mountains and developed areas within the Albuquerque metropolitan area. The North Diversion Channel discharges into the Rio Grande north of Albuquerque. Storm-water runoff from the Albuquerque Service Center first flows south on Girard Boulevard, then west on Phoenix Street, where it enters a storm-drain. The storm-drain ultimately discharges into the North Diversion Channel (City of Albuquerque, 1989).

The Albuquerque Service Center is not located in a 100-year flood plain. The adjacent 100-year flood plain is confined within the AMAFCA North Diversion Channel, which is immediately east of the Albuquerque Service Center.

3.2 GEOLOGY AND SOILS

The Albuquerque Service Center lies within the Albuquerque Basin, an extensive north-south structural depression bordered to the east and west by large uplifted fault blocks. The basin was infilled with thick accumulations of sediment during Tertiary and Quaternary times. The valley fill within the Albuquerque Basin consists of the Santa Fe Group, along with recent alluvium (Kelley, 1977). The Santa Fe Group comprises debris shed from the surrounding highlands. The total thickness of the Santa Fe Group exceeds 10,000 feet in some places (Kelley, 1977). Included within the Santa Fe Group are alluvial fan, playa, eolian, and stream facies (Kelley, 1977).

The soil in the vicinity of the Albuquerque Service Center is the Wink Series. This consists of deep, well-drained soils formed in old unconsolidated alluvium and modified by wind erosion. The soil is a moderately alkaline, calcareous sandy loam, with permeabilities ranging from 2.0 to 6.0 inches per hour (USDA SCS, 1977).

3.3 HYDROGEOLOGY

The principal aquifer in the Albuquerque Basin is the Santa Fe Group, in which ground water occurs under unconfined conditions. The Santa Fe Group aquifer produces water for agricultural, industrial, and domestic purposes and is the most important source of ground water in the Albuquerque area. The total saturated thickness of the Santa Fe Group aquifer is

estimated to exceed 4,000 feet in the Albuquerque area. The transmissivity of the Santa Fe Group aquifer ranges from 35,000 to 114,000 gallons per day per foot (Bjorklund and Maxwell, 1961).

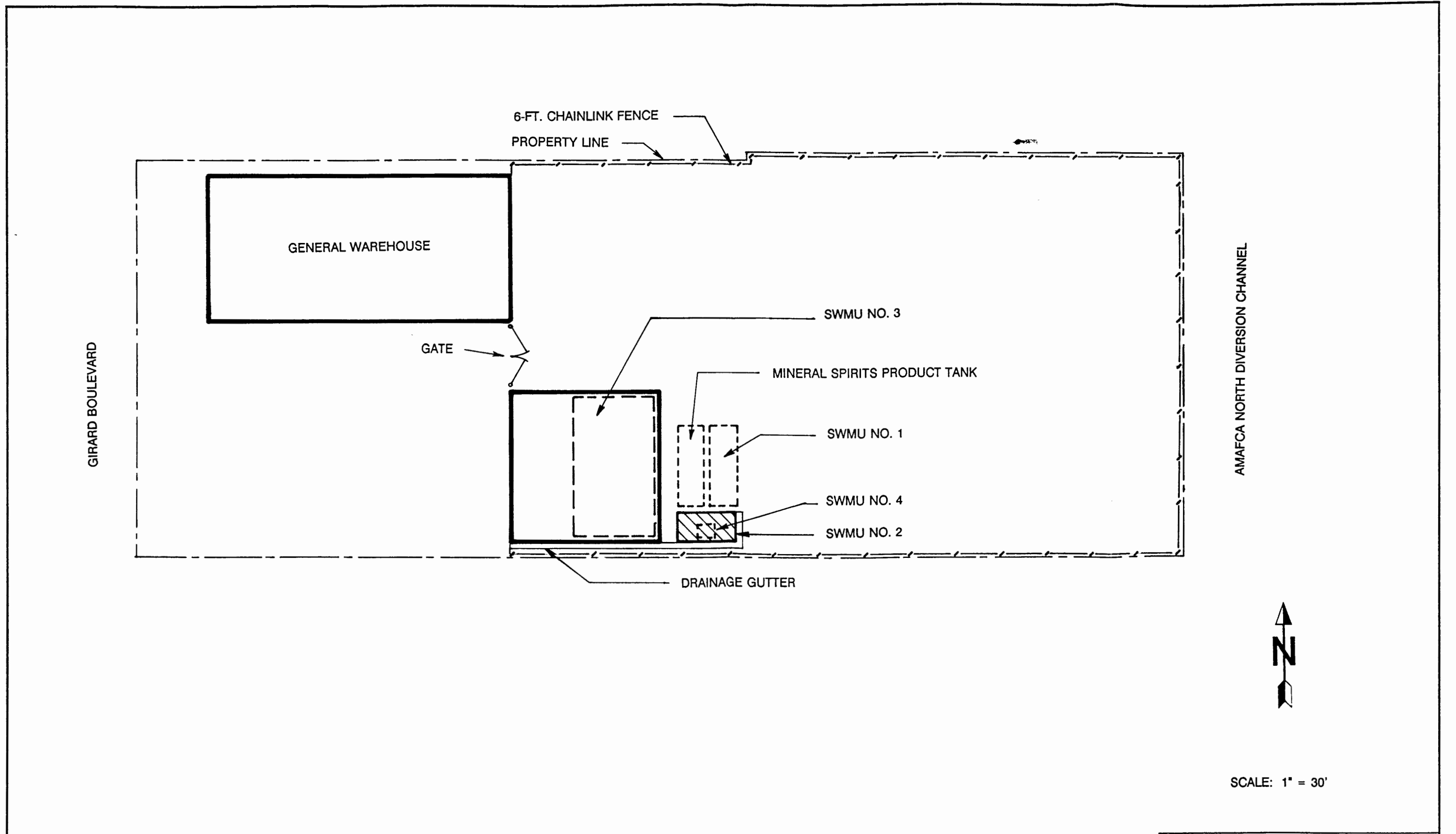
The regional ground-water movement within the Albuquerque Basin is generally toward the south, parallel to the Rio Grande (U.S. Army Corps of Engineers, 1979). The movement of ground water within the Albuquerque metropolitan area is influenced by recharge from the Sandia Mountains and withdrawal by municipal well fields. The City of Albuquerque's Vol Andia and Main Plant well fields are located within a 1-mile radius of the Albuquerque Service Center (U.S. Army Corps of Engineers, 1979). The depth to ground water at the Albuquerque Service Center is estimated to exceed 250 feet. No ground-water monitoring wells have been installed at the Albuquerque Service Center.

4.0 SOLID WASTE MANAGEMENT UNITS

This section discusses the SWMUs at the Albuquerque Service Center and evaluates actual or potential releases from those units. PRC identified four SWMUs as a result of the PR and VSI. Solid waste management units are defined in EPA's RCRA Facility Assessment Guidance (October 1986) as

- Containers, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells, including those units defined as regulated units under RCRA
- Recycling units, wastewater treatment units, and other units which EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by "routine, systematic, and deliberate discharges" from process areas

Figure 2 shows the SWMU locations. Photographs of the SWMUs are provided in Appendix A.



SOLID WASTE MANAGEMENT UNIT LOCATION MAP

SAFETY-KLEEN CORPORATION
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