



Certified Mail - Return Receipt Requested

September 28, 1990
EJJ 90-377



Ms. Kathy Sisneros
New Mexico Health and Environment Department
1190 St. Frances Drive
Santa Fe, New Mexico 89503

Subject: Albuquerque Service Center
NMD 000804294

Dear Ms. Sisneros:

This has been prepared in response to your letter of August 21, 1990. Please find enclosed responses to your comments, a revised text and revised exhibits.

If you have any questions or require information, please contact me on extension 2246.

Sincerely,



Ellen J. Jurczak
Environmental Permits Manager

EJJ/dfh

cc: W. Johnson, Denver Reg. Mgr.
D. Rockwell, Br. Mgr. (7-008-01)
R. Wachsmuth
J. Jendras (letter only)

**SAFETY-KLEEN CORPORATION
ALBUQUERQUE, NEW MEXICO SERVICE CENTER
RESPONSES TO COMMENTS DATED AUGUST 21, 1990**

REQUIRED SIGNATURES

Comment 1:

Pt. IX, sec. 270.11 requires that a responsible official sign all permit applications and reports required by permits. They must also include the certification described in Pt. IX, sec. 270.11 (c).

Provide the necessary signatures and statements as described above.

Response:

A certification statement which has been signed by two corporate officers is enclosed.

Comment 2:

Pt. IX, sec. 270.13 (h) requires the following: (1) a scaled drawing of the facility showing the location of all present, past and future treatment, storage, and disposal areas, and (2) photographs of the facility showing existing structures; existing storage areas; and sites of future storage areas.

Delineate on the site plan the 1500-gallon sump closed in 1983.
Provide photographs delineating the above-referenced items.

Response:

A revised site plan is enclosed and photographs have been requested. The photographs will be sent to your office upon receipt. ✓

Comment 3:

Pt. IX, sec. 270.13 (i) requires design capacity information for the processes used to treat, store or dispose of wastes.

Provide an updated version of the Part A. The process design capacity for the container storage units from Part A is listed as 3,684 gallons. Safety-Kleen's Part B permit application lists three units with capacities of 2,592 gallons, 3,456 gallons and 1,092 gallons, totaling 7,140 gallons. Please provide calculations used to determine the separate unit capacities. ✓

Response:

The Part A permit application has been revised as requested.

Comment 4:

Pt. IX, sec. 270.13 (j) requires a specification of the hazardous wastes to be treated, stored, or disposed annually, and an estimate of the quantity of such wastes.

- a. The Part B of the permit application has listed waste codes for Ignitability (D001), Cadmium (D006), Chromium (D007), and Lead (D008) in the paint waste stream. Please include these in the waste streams listed in the Part A. All wastes that have the ignitable characteristic must be stored in the "Paint Waste Storage Unit" to comply with Pt. V, sec. 264.176 (provide a 50-foot buffer for ignitable waste) and must be included in that waste code determination and its annual quantity estimations.
- b. Please provide the estimated annual quantity and the calculations used to determine that quantity for each waste stream listed in the Part A.

Response:

- a. The Part A permit application has been revised as requested. ✓
- b. Calculations for the annual quantities are based on past quantities of waste generated, multiplied by an anticipated 150% growth factor over the life of the permit. In addition, any waste stream anticipated to be a "TCLP waste" (e.g., the new IC formula and spent antifreeze) were added to these quantities.

Comment 5:

Pt. IX, sec. 270.14 (b)(2) requires Safety-Kleen to obtain detailed chemical and physical analyses of a representative sample of each waste stream managed at Safety-Kleen's facility.

- a. Elements are missing from Safety-Kleen's chemical and physical characterization of its waste streams that are needed to provide adequate information to treat, store or dispose of the wastes properly. A waste characterization of the new Immersion Cleaner provided by your office April 4, 1990 is preferred. Individual analyses from the service center are not necessary; however, records of analyses from the Albuquerque service center provided from the Denton Recycling Center and used to characterize the waste streams are required. ✓
- b. It is not definite that the Immersion Cleaner and the Dry Cleaning Waste are not ignitable. Please provide documentation to determine whether or not they are ignitable. If the documentation shows that this waste stream could demonstrate the ignitable characteristic then provide for regular monitoring of this waste. *Describe or document that Dry Cleaning waste are not ignitable if so, stored in pt. waste shelter.*
- c. Likewise, it is not clear which toxic characteristics the used Immersion Cleaner, Paint Waste, and Mineral Spirit waste streams may demonstrate. What is known regarding the lead, chromium, cadmium content, and the content of the newly listed volatiles for the toxic characteristic for each waste stream? If a possibility exists that any waste not listing those characteristics, might exceed the Toxic Characterization levels, provide for regular analysis of those characteristics. The Toxic Characteristic Leaching Process method for characterizing waste will become effective September 25, 1990 and should be used. ✓ *listed everything will be required to list everything upon closure.*
- d. Safety-Kleen maintains some degree of responsibility for its products that have been delivered to its clients. Please describe the training or information provided to Safety-Kleen clients that addresses notification requirements when processes change as required by Pt. V, sec. 264.13 (a)(3)(i) General Waste Analysis.

Response:

- a. Updated analyses of each waste stream are enclosed. *Use these as example of analysis provided by recycling center*
- b. The Material Safety Data Sheets for the immersion cleaner and perchloroethylene for dry cleaning state these materials are not ignitable. As a result the wastes which result from their use are not ignitable. This information has been added to section 4.3.3. *Show that only perch type received*

c. Safety-Kleen is in the process of having TCLP analyses performed on each waste stream. The results will be sent to your office upon receipt. You should note that all wastes are being listed on the revised Part A permit application as being TCLP wastes for all codes except those applicable to pesticides.

would go a long way in satisfying my concerns

d. This information has been added to section 2.2. *nothing added, would you describe the hazards, spill prevention, clean-up methods, to clients health & environment*

Comment 6:

Pt. V, sec. 264.16 (a)(3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems.

- a. A general training outline is provided in the text and Appendices. Please specifically describe the training program as it applies to the minimum requirements set forth in Pt. V, sec. 264.16 (a)(3). Show that responsible individuals are checked out on emergency equipment for fire and spills and will be able to effectively respond to emergencies.
- b. Provide information on training provided to drivers of the bulk delivery trucks relevant to loading and unloading procedures. Please describe any particular procedures or equipment used to prevent spills or other emergencies.

Response:

- a. The requested information has been added to the training plan outline. *nothing added?*
- b. The bulk tanker drivers are not considered employees at this facility. Their training is done in accordance with DOT and internal corporate standards. Secondary containment is placed around the fill pipes and high level alarms will be in place to prevent spills during loading and unloading operations. This information is in section 3.3.1. The drums of paint waste are kept closed at all times and the shelter was built in accordance with local and NFPA standards to minimize the potential for fires and explosions.

if this question can't be answered then provide more detailed description of tank systems, including shut off valves, traffic patterns inside fac, etc. (see tank reqs)

Comment 7:

Pt. V, sec. 264.17 (b)(1) The owner or operator must document precautions taken to prevent generation of extreme heat or pressure, fire or explosion, or violent reaction.

- a. Describe air monitoring procedures taken to prevent vapor concentrations of waste from becoming explosive. At what levels or conditions do the vapors become explosive? Describe for both the warehouse and the paint storage building, what pressures might build up inside the containers during the summer months in Albuquerque and the precautions taken to prevent hazardous conditions from developing.
- b. EID recognizes that Safety-Kleen wastes are segregated for product control but since spills or other unplanned events occur, please document compatibility of wastes with scientific or other engineering literature. (see also Pt. V, sec. 264, Appendix V.)

Response:

- a. Information on the prevention of explosive situations has been added to section 3.4.3.
- b. Compatibility information has been added to section 3.4.3.

see pg 39-41

Comment 8:

Pt. V, sec. 264.17 (b)(2) The owner or operator must document precautions taken to prevent generation of toxic fumes or gases in sufficient quantities to threaten human health.

Describe air monitoring procedures and other precautions to prevent vapor concentration of wastes from becoming hazardous to human health. At what levels or conditions do the vapors become asphyxiant or hazardous to human health? EID recognizes that a ventilation fan has been installed in the warehouse, but please describe how the fan is operated to prevent the accumulation of vapors.

ok

Response:

The requested information has been added to section 3.4.3.

Comment 9:

Pt. V, sec. 264.15 (b)(1) The owner or operator must develop and follow a written schedule for inspecting monitoring equipment, safety, and emergency equipment that are important to preventing, detecting, or responding to environmental or human health hazards.

- a. Additional information is needed on the leak detection system and the high level alarm system for the underground storage tank system. What monitors are activated by the leak detection system and how will both systems be inspected and tested. At what frequencies will these units be inspected and tested? Include this information on the inspection log sheets.
- b. Include the inspection details and inspection sheets for the paint waste storage unit.
- c. Determine the appropriate number of items to be inspected under each listing on the inspection sheets and include this information on the inspection sheets (i.e. number of fire extinguishers, number of valves or fittings.)

Response:

- a. The requested information has been added to section 3.2.a. *pg 31 nothing*
- b. This information has been added to section 3.2.c. *pg 31 nothing*
- c. This information has been added to each subsection in section 3.2. *added word hour*

Comment 10:

Pt. V, sec. 264.32 This section details the safety equipment a facility must maintain in order to minimize the possibility of fire and explosion, or unplanned release of hazardous constituents to the environment.

The list of required equipment appears to be adequate. However, determining and inspecting the appropriate locations of the emergency equipment could be facilitated if they were shown on the site plan and inspection forms. The legend on the site plan (drawn November 1989) includes many of these items, yet none are located on the site plan drawing. Please include the spill response and personnel safety equipment listed in the emergency equipment list on the site plan or other location listing.

Response:

A site plan showing the locations of emergency response and spill cleanup equipment is enclosed.

Comment 11:

Pt. V, sec. 264.32 (d) requires an adequate volumen of water at adequate pressures to supply fire fighting and emergency equipment.

Safety-Kleen has requested certification from the city utility companies of adequate water volumes and pressure for emergency actions. Have the necessary tests and communications been completed?

Response:

The necessary tests and communications have not been completed. The results will be sent to your office upon completion.

Comment 12:

Pt. V, sec. 264.35 The owner or operator must maintain adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operations.

Is this how they want it described?

Written descriptions of the storage areas indicate that a required aisle space of two feet will be maintained, to provide unobstructed movement. Please provide a floor plan drawing of the warehouse storage area delineating those aisle spaces, height and number of stacked containers, and type wastes to be stored, similar to the plan provided for the paint waste storage area.

Response:

The pallet layout and other requested information has been added to the enclosed floor plan.

Comment 13:

Pt. V, sec. 264.37 The owner or operator must make arrangements with the local authorities to familiarize them with the layout of the facility, properties or hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to, and roads inside the facility, and possible evacuation routes.

- a. Arrangements with local authorities familiarizing them with pertinent operations at Safety-Kleen have not been adequately addressed.
- b. Please include your agreements which designate primary emergency authority to sepcific police and fire department, and agreements with other agencies agreeing to provide support.

Response:

Copies of revised letters to the local authorities are enclosed. These agencies were sent copies of pages 1 and 2 of the Facility Description, chapter 4 and Appendix F.

Comment 14:

Pt. V, sec. 264.52 The content of the contingency plan must include an up-to-date list of the emergency coordinator and the actions facility personnel must take during emergencies.

- a. Update the "Emergency Information" and the "Employees' Functions During Emergency" lists. The existing lists contain Barbara Rockewell's name as the alternate emergency coordintaor and the Warehouseman name is blank. OK
- b. Please update the "Emergency Information" list to include the Albuquerque Office of Emergency Preparedness under "C. Emergency Team To Be Notified". NO
- c. Please designate the individual who determines when fires or spills have become uncontrollable and describe how the evacuation warning is to be delivered. OK

Response:

The requested information has been revised or added to APpendix F and section 4.4., as requested.

Comment 15:

Pt. V, sec. 264.73 (b) Requires Safety-Kleen to maintain a written operating record and record the following information as it becomes available:

- (1) A description and the quantity of each hazardous waste received, and the method and date of its storage as required by Pt. V, sec. 264, Appendix I;
- (2) The location of each hazardous waste within the facility and the quantity;
- (3) Records and results of waste analyses performed;

- (4) Summary reports and details of all incidents that require implementing the contingency plan;
- (5) Records and results of inspections;
- (6) Monitoring, testing or analytical data, and corrective action where required;
- (7) For off-site facilities, notices to generators as specified in 264.12(b);
- (8) All closure and post-closure cost estimates;
- (9) A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste;
- (10) The land ban notices and requirements.

Please indicate that an operating record containing the above information will be maintained, and where it will be maintained.

Response:

This information has been added as section 2.6.

copied in the PLB

Comment 16:

Pt. V, sec. 264.110 (a) describes the applicability of Pt. V, sections 264.111 through 264.115 (which concerns closure) for all hazardous waste facilities.

- a. Additional sampling will be required to determine clean closure for the double-walled tank system. Samples will be taken at the bottom and side walls of the over-excavation pit and analyzed for all waste constituents that had been stored during the use of the tank. Please describe sampling procedures, parameters, and analytical methods expected to be used.
- b. Wastes generated during closure may have to be treated as hazardous waste. Please indicate that Safety-Kleen is prepared to submit documentation on the disposal of any sludge, rinse water, and cut-up tank pieces. Documentation should include any analyses, quantities, and disposal locations of the wastes.

*See Pt. A § 7CLP
analysis of MS 109 →
determine constituents →
corrective action may
require additional
perm it mod.*

Response:

- a. This information has been added to section 6.2.3.d.
- b. This information has been added as section 6.2.3.f.

Comment 17:

Pt. V, sec. 264.175 (b)(2) All containers are to be elevated to be protected from contact with accumulated liquids resulting from leaks, spills or precipitation.

Most of the waste containers have been described as being stored on pallets. It is not clear that all containers will be maintained on pallets, particularly the Immersion Cleaner wastes. Please describe procedures to ensure that all containers are stored such that they do not have contact with any spilled accumulated liquids.

Response:

This information has been added to section 3.3.2.

Comment 18:

Pt. V, sec. 264.192 and 264.193 Addresses the design and installation of new tank system, and the containment and detection of releases.

- a. An assessment certified by an independent engineer of the proposed underground hazardous waste tank system design and installation was received April 5, 1990. Please include an update of the tank storage section 3.3.1., and indicate when the single-walled tank will be replaced by the tank described in the assessment.
- b. The tank assessment indicated that the leak detection system used a liquid sensing device. Please provide additional information on the type of device and its ability to detect liquids within the secondary container. Describe what methods and frequencies that the system can be tested for continued safe operation.
- c. The plans submitted in the Part B permit application indicate that four specification sheets for Safety-Kleen's Double Walled Tanks were to be included. Only the last three were received, please include sheet number one, particularly if it showed piping details.

Response:

- a. This information has been added to section 3.3.1.
- b. Information on the proposed system, including the leak detection system, is enclosed.
- c. The requested drawing is not available and the drawings have been renumbered.

Comment 19:

Pt. V, sec. 264.192 (a)(3)(ii) Requires the owner or operator to provide external corrosion protection to insure integrity of the tank during its use.

Safety-Kleen has planned to install a system in which no metal is exposed and the tank is isolated from stray electrical currents. Please show how the tank will be isolated from stray electrical currents.

Response:

This information has been added to section 3.3.1.

Comment 20:

Pt. V, sec. 264.195(a)(1) Aboveground portions of the tank system are to be inspected to detect corrosion or releases of waste.

Underground piping and joints were indicated to be "secondary containment piping" and Aboveground piping inspections have been provided for in the inspection check lists, but it is unclear whether all piping is visible from the return and fill drains to the point piping becomes double lined. Please provide piping plans for the return and fill station, flow diagrams and inspection procedures for the aboveground piping not double lined.

Response:

All piping is aboveground and all joints are welded so that secondary containment is not required. this information has been added to section 3.3.1.

Comment 21:

Pt. V, sec. 264.196 (d) and (f) Any release to the environment must be reported to the Regional Administrator within 24 hours of its detection, and certification of major repairs is required.

Please update section 3.4.4 regarding the tank evaluation and repair plan.

Response:

This section has been revised as requested.